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**2023 Independent Environmental Audit
J.J. Richards & Sons Pty Ltd
Glendenning Liquid Waste Facility
14 Rayben Street, Glendenning NSW**

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We declare that:

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

Report version	Authors	Date	Reviewer	Approved for issue	Date
Draft (V1)	R. Loemker	24/01/2024	Dr. M.Jackson, A. Parsons	A. Parsons	25/01/2024
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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 December 2023, as required under Condition C9 of the Development Consent of State Significant Development 6767. The scope of the Audit was limited to the period between 12th January 2021 and 11th January 2024.

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*:

- Modification 1 (Mod 1) – determined on 9 July 2019 for the 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) – determined on 25 August 2020 for the removal of processing limits for individual waste types.

The Audit included environmental performance requirements under the Environment Protection Licence (21053) for the same period.

The results of the audit are summarised below.

- SSD 6767 compliance conditions:
 - Six (6) non-compliances were identified during the Audit.
- EPL 21053 licence conditions:
 - Two (2) non-compliances were identified during the Audit.

Four of the six non-compliances under SSD6767 and all of the non-compliances under EPL 21053 relate to an off-site environmental incident that occurred when 21,000 Litres of Oily Water (J120) mixed with treated Grease Trap Waste (TGTW) was land applied. The Oily Water was collected from an underground car wash waste water pit instead of an underground grease trap waste pit. After the collected liquid waste was delivered to the Glendenning Liquid Waste Facility and processed through the normal grease trap waste treatment process, it was dispatched to JJ Richards' owned Marulan Farm for application to land. It is understood that approximately 21,000 Litres of the contaminated TGTW had already been injected into Paddock 3B before the injection process was ceased. Following identification of the issue, injection was immediately ceased and the remaining 34,000 Litres of contaminated TGTW was placed into an empty tank at the Marulan Farm and later lawfully disposed of at Enviro Waste Services Group Pty Ltd at 14-16 Kiora Crescent, Yennora NSW. The Auditors are satisfied with the actions that have been implemented by JJ Richards in preventing a re-occurrence of the incident.

The other two non-compliances are in relation to small odour proof enclosure that was built within the warehouse to house the KDS Separator for solid / liquid separation. The construction of the enclosure was approved by Blacktown City Council as Complying Development (certificate number CDC-22-00390) on 8 June 2022. The small odour proof enclosure is currently being used, however the Occupation Certificate for the development is yet to be obtained from Blacktown City Council.

The NSW Environment Protection Authority, Blacktown City Council, Transport for NSW, Sydney Water, NSW Department of Primary Industries and the NSW Department of Planning and Environment were consulted on the environmental performance of the development. All agencies with the exception of Sydney Water and Transport for NSW responded. The responses from each agency have been addressed in this report.

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 complaints were recorded during the Audit Period which is testament to the environmental controls implemented at the Site.

The 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.

The Audit team found that the Site is operated by JJ Richards to a good standard however, improvements / recommendations have been provided to ensure the risk of on or off-site environmental incidents remains low.

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1. Introduction

This report presents the findings of the Independent Environmental Audit (the Audit) conducted by Jackson Environment and Planning Pty Ltd (JEP) in December 2023.

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 (the Site) for the period between 12th January 2021 and 11th January 2024 (the Audit Period).

On 18th October 2023, the Department of Planning and Environment approved the Audit team to undertake the Audit (refer to Appendix B).

1.1. Background

Operating under State Significant Development 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).

On 28th November 2023, the NSW EPA amended Condition L2.2 to increase the quantity of waste stored at any one time at the premises and amend the units from tonnes to kilolitres to better align with how liquid waste is recorded at the Site. The site is now approved to store up to 1,385 kilolitres of waste at any one time (previous 1,212 tonnes where 1 tonne was equivalent to 1 kilolitre).

The Glendenning LWF has consent to operate between 4am and 9pm Monday to Saturday. The general processes at the Glendenning LWF 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 and processing 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;
- Storing used oil (J100 type waste) – including mineral oils unfit for their original intended use, oil filters, transformer fluids (excluding PCB's), waste hydrocarbons for resource recovery, aggregation and transport to re-refining and other facilities for treatment and reuse; and
- Storing industrial oily water (J120 type waste – waste oil / hydrocarbons mixtures / emulsions in water) that has separated from the stored used oil. This resulting waste was then transported to other lawful treatment facilities

Equipment for unloading, treatment, storing and loading liquid grease trap and food waste is located within the Organics Plant. The bunded tank farm within the Organics Plant 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 Hydrocarbon Plant. The bunded tank farm within this structure is provided with spill protection for the following equipment:

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

As required under Condition C9 and C10 of the Development Consent (SSD 6767), an Independent Environmental Audit is be carried out and submitted to the Department of Planning 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 the 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).

1.2. Audit team

The Audit team from JEP included Dr Mark Jackson (Technical Auditor); Rylan Loemker (Technical Auditor) and Alan Parsons (Lead Auditor).

Mark is a waste management specialist and has 29 years' experience in the field. Mark has supported the environmental planning, approvals and licensing of some of the largest waste and recycling infrastructure projects in NSW. He is also an experienced environmental auditor. Mark has been responsible for Annual Reports and Independent Audits for State Significant Development projects for sites operated by Veolia Environmental Services (Woodlawn, Camellia Resource Recovery Facility, Clyde Waste Transfer Terminal and Banksmeadow Waste Transfer Terminal), Cleanaway (Erskine Park Waste Transfer Station), J.J. Richards & Sons (Glendenning Liquid Waste Facility), Bingo Industries (Kembla Grange and Mortdale Resource Recovery Facilities), and regularly conducts planning and environmental compliance audits for owners and operators of waste and recycling facilities in NSW.

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

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

1.3. Audit objectives

The objectives of this the Audit are to:

- Assess the environmental performance of the Site operations between 12th January 2021 and 11th January 2024;
- Review any non-compliances identified in the previous audit, which covered the period between 15th June 2018 and 11th January 2021 and the actions that have been carried out to resolve these non-compliances; and
- Summarise the findings of the Audit and provide recommendations for improvement (if any).

1.4. Audit scope

The considerations relevant to the scope of the Audit include:

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

1.4.1. Site changes and upgrades

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

The modifications are summarised below:

- Modification 1 (Mod 1) – determined on 9 July 2019 for the 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) – determined on 25 August 2020 for the removal of processing limits for individual waste types.

In August 2023 a small odour proof enclosure was built within the warehouse to house the KDS Separator for solid / liquid separation. The construction of the enclosure was approved by Blacktown City Council as Complying Development (certificate number CDC-22-00390) on 8 June 2022. The small odour proof enclosure is currently being used however the Occupation Certificate for the development is yet to be obtained from Blacktown City Council (refer to Section 3.4.1).

1.4.2. Documentation

The scope of the Audit was limited to assessing the environmental performance of the Site in accordance the conditions of Development Consent SSD 6767 for the period between 12th January 2021 and 11th January 2024. The scope of the Audit included an assessment of the following matters:

- The conditions of all relevant approvals;
- Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.15 dated August 2023;
- Environment Protection Licence 21053;
- Facilities manual dated 24 February 2023;
- Waste receipt and dispatch forms
- Waste Inventory Spreadsheet;
- Sydney Waste Corporation Consent to Discharge Industrial Trade Wastewater 39115 (Activity Grease Trap Waste Disposal) dated 9th June 2023.
- Sydney Water Inspection Report dated 25 September 2023.
- Meteorological station data;
- Site checklist;
- Complaints register;
- Incident register;
- Annual Review 2021 (dated 11th January 2022);
- Annual Review 2022 dated 11th January 2023);
- Annual Review 2023 (dated 11th January 2024);
- Annual Return 2021;
- Annual Return 2022;
- Annual Return 2022;
- Pollution Incident Response Management Plan Version 10 dated October 2023;
- Odour Audit prepared by Trinity Consultants Australia Pty Ltd dated 8th April 2023;
- 2021 Independent Environmental Audit prepared by Jackson Environment and Planning Pty dated 9th April 2021; and
- Feedback received from other regulatory agencies on the performance of the operation.

The Audit included the development modifications (Mod 1 and Mod 2 inclusive) as listed above.

Records reviewed fell within this period; however, some observations made by the Auditors relate to the site inspection and audit conducted on 4th December 2023.

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

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 6767.

1.4.3. Spatial Scope

The Glendenning LWF as located at 14 Rayben Street, Glendenning NSW entirely within Lot 123, DP870988 which defines the spatial scope of the Audit. The spatial scope of the Audit is shown in Figure 1.1.

1.5. Audit period

This audit is required under Condition C9 of the Development Consent (SSD6767). 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...

JEP conducted the 3-year audit which covered the period between 12th January 2021 and 11th January 2024.

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



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
12/12/2023	Revision A	R. Loemker	14 Rayben Street, Glendenning NSW			Project	Glendenning LWF
						Title	Spatial Scope of audit
						Scale	As shown
						Source	Nearmap

2. Audit Methodology

2.1. Selection and endorsement of audit team

In accordance with Condition C9 of SSD 6767 and Section 3.1 of the *Independent Audit – Post Approval Requirements*, JJ Richards presented the Audit team to the Department of Planning and Environment for approval.

The Audit team from JEP included Mark Jackson (Technical Auditor); Rylan Loemker (Technical Auditor) and Alan Parsons (Lead Auditor).

The Department of Planning and Environment approved the Audit team on 18th October 2023 (refer to Appendix B).

The Independent Audit Certification is provided in Appendix C.

2.2. Independent Audit scope development

The Audit scope was developed with consideration to:

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

The scope of the Audit also considered the requirements of the conditions of consent and any previous audits undertaken. The Audit also included the requirements of the Environment Protection Licence (EPL) for the Site, which is not specifically required under Condition C9.

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

2.3. Compliance evaluation

The Independent Environmental Audit was conducted in accordance with the *Independent Audit – Post Approval Requirements* (Department of Planning and Environment, 2020) and ISO 19011:2018 *Guidelines for Auditing Management Systems*. The Audit involved the following stages:

- **Audit initiation** – Documents relating to the Audit period between 12th January 2021 and 11th January 2024 as well as the findings of previous audit were requested;
- **Document review** – Received documentation was reviewed for the purpose of developing the Audit plan of what will be audited;
- **Audit plan** – An audit plan was developed outlining what would be audited, who would do the Auditing, when it would happen and who would be audited;
- **Onsite audit** – The onsite audit began with an opening meeting to make introductions, confirm the scope and extent of the Audit and discuss the schedule. Following the meeting, documents immediately presented by Cleanaway were reviewed to gather relevant information that might not have been available beforehand. The Auditors then commenced the Audit by interviews and collecting the records / observations that demonstrated whether the processes meet the Development Consent conditions and EPL requirements. Audit findings and any audit conclusions were presented at the closing meeting; and
- **Audit Report (this report)** – The final findings will be formally written and distributed in an audit report.

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

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

2.4. Site interviews

The JJ Richards personnel, including names and position title, that were available to support the Audit and site inspection are documented in Table 2.1 below.

Table 2.1. JJ Richards representatives supporting the Audit.

Name	Position	Organisation
Monique Bachtis	Regional Manager NSW/ACT Liquid Infrastructure	JJ Richards and Sons Pty Ltd
Nathan Lakeman	Facilities Manager	JJ Richards and Sons Pty Ltd

2.5. Site inspections

The Auditors attended a site inspection on 4th December 2023. Photographs taken during the site inspection are provided in Appendix D.

2.6. Consultation

As part of the Audit process, JEP consulted the NSW EPA, Blacktown City Council, Transport for NSW, Sydney Water, NSW Department of Primary Industries and the Department of Planning and Environment on key environmental issues which need to be considered in the Independent Environmental Audit. Letters were sent to each agency providing an opportunity to provide feedback which was requested by 30th October 2023. The letters and responses are contained within Appendix E.

Feedback from the consultation process is summarised in Section 3.8.

2.7. Compliance status descriptors

The compliance assessment criteria as outlined in the *Independent Audit – Post Approval Requirements (DPE, 2020)* has been used in this Audit and has been documented in Table 2.2 below.

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

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

3. Audit Findings

This section provides the main findings of the Audit to address all the requirements of Condition C9 of SSD 6767 (as modified). The compliance checklists are provided in the Appendix A as follows:

- SSD 6767 compliance conditions - Table A1; and
- EPL 21053 licence conditions - Table A2.

3.1. Approval and document list

Key documents reviewed as part of the Audit include (but is not limited to) the following documents relevant to the Audit period. Specific items of evidence used to assess compliance to the conditions of consent under SSD 6767 (as modified) are outlined in the compliance audit tables in Appendix A.

- Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.15 (dated August 2023);
- Facilities manual (dated 24 February 2023);
- Waste receipt and dispatch forms;
- Waste Inventory Spreadsheet;
- Sydney Waste Corporation Consent to Discharge Industrial Trade Wastewater 39115 (Activity Grease Trap Waste Disposal) (dated 9th June 2023);
- Sydney Water Inspection Report (dated 25 September 2023);
- Meteorological station data;
- Site checklist;
- Complaints register;
- Incident register;
- Annual Review 2021 (dated 11th January 2022);
- Annual Review 2022 dated 11th January 2023);
- Annual Review 2023 (dated 11th January 2024);
- Annual Return 2021;
- Annual Return 2022;
- Annual Return 2022;
- Pollution Incident Response Management Plan Version 10 dated October 2023;
- Odour Audit prepared by Trinity Consultants Australia Pty Ltd dated 8 April 2023;
- 2021 Independent Environmental Audit prepared by Jackson Environment and Planning Pty (dated 9 April 2021); and
- Feedback received from other regulatory agencies on the performance of the operation.

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.

The Audit team found that the Site is operated by JJ Richards to a good standard however, improvements / recommendations have been provided to ensure the risk of on or off-site environmental incidents remains low

A summary of the non-compliances that were identified during the 2023 Audit is provided below:

- SSD 6767 compliance conditions:
 - Four (4) non-compliances were identified during the Audit.
- EPL 21053 licence conditions:
 - Two (2) non-compliances were identified during the Audit.

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

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

Notification of an off-site environmental incident was reported to the NSW EPA on 1st June 2023 in relation to approximately 21,000 Litres of Oily Water (J120) mixed with treated Grease Trap Waste (TGTW) being injected into land described as Plot 2 of Paddock 3B, at 152 Medway Road, Marulan Farm, NSW 2579 (Marulan Farm). Under *the JJ Richards Glendenning and Hume treated grease trap waste order 2022* (the Order), TGTW is permitted to be applied to land at the Marulan Farm. However, this does not include Oily Water.

A history of the off-site environmental incident is provided below.

On 25th of May 2023, a JJ's Waste & Recycling contracted collection driver attended a customer's premises to collect grease trap waste from an underground pit, however, the driver inadvertently collected car wash waste water from a different underground pit and delivered the collected liquid waste to the Glendenning LWF. The liquid waste was then processed through the normal grease trap waste treatment process.

On 1st June 2023, the Operations Manager informed the Glendenning Facilities Manager of the suspected delivery of Oily Water material on the 25th of May 2023. However, the batch of TGTW containing the contaminated load had already been dispatched to the Marulan Farm. The Facilities Manager contacted the Marulan Farm Supervisor who confirmed that approximately 21,000 Litres of the contaminated batch had already been injected in Paddock 3B. The Facilities Manager directed the Farm Supervisor to cease injection of the batch and to isolate the remaining material pending further instruction. On 1st June 2023, 34,000L of suspected contaminated TGTW had been placed in an empty tank at the Marulan Farm.

The NSW EPA was notified on 1st June 2023 via the Environment Line service and via email. A detailed Incident Report was prepared by JJ Richards and submitted to the NSW EPA on 16th June 2023.

On 6th June 2023, JJ Richards arranged for samples to be collected from the residual contaminated TGTW in the B-Double truck which transported the contaminated TGTW from the Premises to Marulan Farm, as well as from soils from the application area at Marulan Farm.

Laboratory results from SESL Australia Pty Ltd showed that¹:

- Copper levels in the contaminated TGTW in the B-Double truck was reported at the maximum allowable concentration under the Order; and
- Total Recoverable Hydrocarbon (TRH) F3 and F4 fractions were reported in shallow and deeper soils at the application area with concentrations highest at surface, whilst F2 and F3 petroleum concentrations were also detected within subsoils.

¹ JJ Richards has provided the following comment in response to this matter: *The above laboratory results demonstrate that the batch injected was in compliance with the maximum allowable concentrations of the various chemical attributes listed within the TGTW RRO.*

On 26th June 2023, the remainder of the contaminated TGTW was taken to Enviro Waste Services Group Pty Ltd at 14-16 Kiora Crescent, Yennora NSW 2161 for lawful disposal.

On 6th July 2023 the NSW EPA issued an advisory letter requesting additional information to assist with the investigation. This additional information was to be provided by 11th August 2023, and was to include:

- A copy of the waste disposal docket for the remainder of the contaminated TGTW that was taken to Enviro Waste Services Group Pty Ltd;
- A report outlining what precautions will be implemented by JJ Richard's to prevent the recurrence of an incident of a similar nature; and
- A copy of the sampling plan as required under the Order as well as the results of any sampling conducted in accordance with the Order and/or sampling plan, for the period from 25th May 2023 to 8th June 2023 (inclusive).

A response to the additional information was provided by JJ Richards 10th August 2023 and subsequently acknowledged as received by the NSW EPA on 11th August 2023. No further correspondence has been received from NSW EPA regarding the matter.

3.4. Non-compliances

3.4.1. State Significant Development 6767 Non-Compliances (Part A)

Under Part A, the site was non-compliant against three (3) conditions of consent. A summary of these non-compliances found for each condition is provided below.

Condition A1 requires JJ Richards to...

...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.

Due to the off-site environmental incident that occurred as documented in Section 3.3, the Audit team are of the opinion that JJ Richards failed to implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development.

Condition A2 requires JJ Richards to...

...carry out the Development in accordance with the:

- a) Development Application (SSD 6767);*
- b) EIS;*
- c) RTS;*
- d) in accordance with MOD 1 and MOD 2;*
- e) Conditions in Schedule B;*
- f) The development layout plans and drawings listed at Appendix 1; and*
- g) management and mitigation measures as identified in Appendix 5.*

Condition A10 requires ...

All engineering works must be designed and undertaken in accordance with the relevant aspects of:

- 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.*

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, Road Act 1993 or Local Government Act 1993 Approval.

The non-compliances against Conditions A2 and A10 relate to the small odour proof enclosure that was built within the warehouse to house the KDS Separator for solid / liquid separation. The construction of the enclosure was approved by Blacktown City Council as Complying Development (certificate number CDC-22-00390) on 8 June 2022. The small odour proof enclosure is currently being used, however the Occupation Certificate for the development is yet to be obtained from Blacktown City Council².

3.4.2. State Significant Development 6767 Non-Compliances (Part B)

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

Condition B3 requires JJ Richards to:

...ensure the transportation of waste is:

- a) *undertaken by a transporter authorised to transport such wastes; and*
- b) *to a place that can lawfully accept that waste.*

Condition B4 requires JJ Richards to:

...dispose of all outputs produced on site to a suitably licensed facility or to sewer as Trade Waste:

- 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.*

Due to the off-site environmental incident that occurred as documented in Section 3.3, the Audit team are of the opinion that waste was not taken to a place that could lawfully accept that waste and disposed of to a suitably licensed facility.

² JJ Richards has provided the following comment in response to this matter: *JJ's have provided all requested information to Blacktown City Council however have been notified by return email that the officer responsible for the matter has been on two (2) separate leaves from work. JJ's has requested another officer provide the completed Certificate as soon as possible.*

3.4.3. State Significant Development 6767 Non-Compliances (Part C)

Under Part C, the site was non-compliant against one (1) condition of consent. A summary of this non-compliance is provided below.

Condition C7 requires JJ Richards to:

...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.

Due to the off-site environmental incident that occurred as documented in Section 3.3, the Audit team are of the opinion that the Secretary was not notified³.

3.4.4. Environment Protection Licence Non-Compliances

The Site was found to be non-compliant with two (2) EPL conditions. A summary of these non-compliances found for each condition is provided below.

Condition O1.1 state:

Licensed activities must be carried out in a competent manner. This includes:

- a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and*
- b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.*

Condition O5.2 states:

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 above two (2) non-compliances are associated the off-site environmental incident that occurred as documented in Section 3.3. The Audit team are of the opinion that waste was not taken to a place that could lawfully accept that waste and disposed of to a suitably licensed facility.

³ JJ Richards has provided the following comment in response to this matter: *JJ's have advised that the non-compliance documented in Section 3.3 was noted on the Annual Review submitted to the Department on 11th January 2023 and consider that this demonstrates a misunderstanding of the conditions rather than a deliberate non-notification / breach of the conditions as they were forward with outlining the non-compliance in the review document. JJ's have advised that the conditions of the DA was reviewed to identify areas where the non-compliance may need to be notified, however did not consider it fit within the reporting conditions. As the definition refers to 'exceeding the limits or performance criteria', it was considered this referred to the limits set within the DA relating to the type and amount of waste the Site can received in a year, which JJ's noted was not breached. JJ's have advised that they have spoken with the Department following the submission of the Annual Review and discussed the misunderstanding surrounding the definition of 'Incident'.*

Table 3.1. Summary of the non-compliance against the SSD 6767 conditions of consent and EPL 21053 licence conditions.

Conditions of Consent / EPL Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
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 of this audit	Two (2) non-compliances were identified against Part B of the conditions of consent	Non-compliant
A2	The Applicant shall carry out the Development in accordance with the: <ul style="list-style-type: none"> a) Development Application (SSD 6767); b) EIS; c) RTS; d) in accordance with MOD 1 and MOD 2; e) Conditions in Schedule B; f) The development layout plans and drawings listed at Appendix 1; and g) management and mitigation measures as identified in Appendix 5. 	Refer to Section 3.3	Refer to Table 4.1	Non-compliant
A10	All engineering works must be designed and undertaken in accordance with the relevant aspects of: <ul style="list-style-type: none"> h) Council's Works Specification - Civil (Current Version); i) Council's Engineering Guide for Development (Current Version); j) Council's Development Control Plan (Current Version) including Part J - Water Sensitive Urban Design and Integrated Water Cycle Management; k) Council's Soil Erosion and Sediment Control Policy (Current Version); l) Council's on-Site Detention General Guidelines and Checklist; and m) Upper Parramatta River Catchment Trust's On-Site Stormwater Detention Handbook THIRD Edition December 1999. 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, Road Act 1993 or Local Government Act 1993 Approval.	Refer to Section 3.3	Refer to Table 4.1	Non-compliant

Conditions of Consent / EPL Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B3	The Applicant shall ensure the transportation of waste is: <ul style="list-style-type: none"> n) undertaken by a transporter authorised to transport such wastes; and o) to a place that can lawfully accept that waste. 	Refer to Section 3.3	Refer to Table 4.1	Non-compliant
B4	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: <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. 	Refer to Section 3.3	Refer to Table 4.1	Non-compliant
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.	Refer to Section 3.3	Refer to Table 4.1	Non-compliant
O1.1	Licensed activities must be carried out in a competent manner. This includes: <ul style="list-style-type: none"> a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. 	Refer to Section 3.3	Refer to Table 4.1	Non-compliant
O5.2	If waste is transported from the premises, the licensee must ensure that the waste is transported: <ul style="list-style-type: none"> a) by a waste transporter authorised to transport such waste; and b) to a place that can lawfully accept that waste. 	Refer to Section 3.3	Refer to Table 4.1	Non-compliant

3.4.5. Compliance with Operational Environmental Management Plan

The Audit also considered compliance against the sites Operational Environmental Management Plan (Version: 1.15 dated August 2023). The non-compliances are noted in Table 3.2.

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

Environmental Aspect	Compliance	Applicable Non-compliance Reference(s)
General / Administrative	Non-Compliant	<ul style="list-style-type: none"> SSD 6767 CoCs: A1, A2 and A10
Hazard Management	Compliant	
Incident Management	Non-Compliant	<ul style="list-style-type: none"> SSD 6767 CoCs: C7
Complaint Management	Compliant	
Air Management	Compliant	
Noise Management	Compliant	
Spill Management	Compliant	
Stormwater Management	Compliant	
Traffic Management	Compliant	
Waste Management	Non-Compliant	<ul style="list-style-type: none"> SSD 6767 CoCs: B3 and B4 EPL 21053 Condition: O1.1 and O5.2

3.5. Previous audit recommendations

The 2021 Independent Environmental Audit conducted by JEP (report dated 9th April 2021) found no non-compliances, no complaints and no environment incidents during the Audit Period. The Audit team found that the Site was operated by JJ Richards to a high standard. All procedures relating to the operation of the development are effectively implemented. Therefore, not further recommendations were made.

3.6. EMP, sub-plans and compliance documents

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 SSD6767 Conditions of Consent (CoCs).

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

- Hazards;
- Incidents;
- Complaints;
- Air;
- Noise;
- Spills;
- Stormwater;
- Traffic; and
- Waste.

The OEMP includes the following management plans:

- Odour Management Plan;
- The Waste Monitoring Program;
- Pollution Incident Response Management Plan.

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

The environmental management plans, sub-plans and compliance documents appear to be satisfactory in implementing the conditions of consent as approved under SSD 6767 (as modified).

The Audit has identified that the mitigation measures that are proposed in the OEMP and sub plans are well implemented at the Site.

3.7. 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 Hydrocarbon Plant 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 on-site environment incidents recorded during the Audit Period.

Grease trap waste that is liquid waste (K110 type waste) as defined in the POEO Act is treated at the facility. Treatment generally involves separating liquids from solids and discharging treated liquids as trade waste Sydney Waste Corporation's sewer system under Consent to Discharge Industrial Trade Wastewater 39115 (Activity Grease Trap Waste Disposal) dated 9th June 2023.

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 and Hume Treated Grease Trap Waste Order & Exemption 2022* which is issued under Part 9, Clauses 91 and 92 of the *Protection of the Environment Operations (Waste) Regulation 2014*.

Condition B3 and B4 of the Development Consent require JJ Richards to dispose of all outputs produced on site to a suitably licensed facility or to sewer as Trade Waste.

As documented in Section 3.3 an off-site environmental incident occurred when 21,000 Litres of Oily Water (J120) mixed with TGTW was injected into land at the Marulan Farm. The Oily Water was collected from an underground car wash waste water pit instead of an underground grease trap waste pit. After the collected liquid waste was delivered to the Glendenning LWF and processed through the normal grease trap waste treatment process, it was dispatched to the Marulan Farm for application to land. It is understood that approximately 21,000 Litres of the contaminated TGTW had already been injected in Paddock 3B before the injection process was ceased. The remaining 34,000 Litres of contaminated TGTW was then placed in an empty tank at the Marulan Farm and later lawfully disposed of at Enviro Waste Services Group Pty Ltd at 14-16 Kiora Crescent, Yennora NSW.

It is understood that this matter has yet to be closed out with the NSW EPA. It is the opinion of the Auditors that JJ Richards is non-compliant with Condition B3 and B4.

It is understood that, to prevent a reoccurrence of this issue, JJ Richards have carried out the following actions:

- Adjustments have been made to the Runsheet for the customer in question to clarify the nature of each pit on site to ensure it can be correctly identified;
- Provided additional refresher training to NSW Sales Representatives in regard to Grease Trap Pit locations and the correct details which need to be record during the customer sign up process to ensure pits are classified and identified correctly for the collection driver; and
- Provide additional refresher training to liquid collection drivers which covers the nature of this incident, how to correctly identify a grease trap waste pit and what action to take if they have concerns about the nature of a pit prior to collection.

The Auditors are satisfied with the actions that have been implemented by JJ Richards in preventing a re-occurrence of the incident.

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.

3.8. Consultation outcomes

As part of the Audit process, JEP consulted the NSW EPA, Blacktown City Council, Transport for NSW, Sydney Water, NSW Department of Primary Industries and the Department of Planning and Environment (including the Environment and Heritage Group) on key environmental issues which need to be considered in the Independent Environmental Audit.

Consultation letters were issued to all agencies on 30th October 2023.

The following sections summarise the feedback received from the agencies consulted. The individual agency responses are provided in Appendix E.

3.8.1. NSW EPA

The NSW EPA responded to the consultation letter in an email dated 4th December 2023. The NSW EPA did not specify any key environmental issues which needed to be considered in the Independent Environmental Audit. However the NSW EPA did highlight the off-site environmental incident which occurred in May 2023. This has been discussed and addressed in Section 3.3 and other sections throughout this report.

3.8.2. Blacktown City Council

Blacktown City Council (BCC) responded to the consultation letter in an email dated 24th November. BCC requested that several matters be considered in the Audit. These matters are set out in Table 3.3 along with a reference to where these comments have been addressed in the Audit report.

Table 3.3. Summary of consultation feedback from Blacktown City Council and how the comments have been addressed in the Audit.

Environmental Issue	Summary of BCC comment / request (from email dated 24 th November 2023)	Summary response	Section addressed
Surface water	We are committed to the preservation and protection of waterways. Ensuring the J.J. Richards Liquid Waste Facility at Glendenning is not impacting on the nearby drainage channels and waterways is our top priority.	This has been assessed in the Audit through a review of compliance with Conditions of Consent .	Section 3.11.6
Air Quality	We would like to confirm the facility is not impacting on the air quality of the local area. Ensuring that odour and aerosols are being contained within the facility.	This has been assessed in the Audit through a review of compliance with Conditions of Consent.	Section 3.11.3
Complaints	BCC confirm that no records of concerns or complaints being raised about the operations of the facility have been received	Noted. The Auditors identified that no complaints have been received during the Audit Period.	Section 3.9

3.8.3. Transport for NSW

Transport for NSW responded to the consultation letter in an email dated 10th November 2023 stating that Transport for NSW has no comment on the scope of the Independent Environmental Audit.

3.8.4. Sydney Water

No comments were received from Sydney Water. Should feedback be received in future, an addendum to this Audit Report will be prepared.

3.8.5. NSW Department of Primary Industries

No comments were received from the NSW Department of Primary Industries. Should feedback be received in future, an addendum to this Audit Report will be prepared.

3.8.6. NSW Department of Planning and Environment

The Department of Planning and Environment (DPE) responded to the consultation letter in an email dated 3rd November 2023. DPE has requested that the Independent Environmental Audit provide an assessment of the environmental performance of the project in accordance with the requirements of the consent and the *Independent Audit Post Approval Requirements* (Department of Planning and Environment, 2020) with a focus on air quality.

This has been assessed in the Audit through a review of compliance with Conditions of Consent.

3.8.7. The Department of Planning and Environment - Environment and Heritage Group

The Environment and Heritage Group of the Department of Planning and Environment responded to the consultation letter in an email dated 2nd November 2023 requesting to be removed from the contact list for the Independent Environmental Audit.

3.9. Complaints

No complaints were received during the Audit Period.

3.10. Incidents

There were no on-site environmental incidents recorded for the Audit Period.

An off-site environmental incident which is related to the operations of the Glendenning LWF has been discussed in Section 3.3.

3.11. Actual versus predicted environmental impacts

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

⁴ Environmental Impact Statement for Liquid Waste Facility and Depot at 14 Rayben Street, Glendenning prepared by Duggan & Hede Pty Ltd Version 1.0 dated March 2016.

3.11.1. Meteorological

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

3.11.2. Noise and Vibration

A Noise Quality Assessment was prepared for the EIS and predicted that the potential noise sources at the site would include truck movements, and pumps and motors inside the treatment building.

The results of the noise monitoring indicated compliance with the LA_{eq} criteria with the proposed LWF. Modelling of LA_{Max} noise levels from reversing alarms and truck movement (modelled) simultaneously) identifies a maximum noise level of 37 dB(A) at the nearest sensitive receptors, which is compliant with the 46 dB(A) criteria.

No noise or vibration monitoring was undertaken during the Audit Period as this is not required for the Site and therefore quantitative comparisons of actual versus predicted environmental impacts cannot be made.

However, noise and vibration were kept within reasonable levels at the site by implementing the mitigation measures documented in the OEMP. No noise or vibration complaints were received during the Audit Period and therefore no additional remedial actions/ mitigation measures were required to be implemented during the Audit period.

3.11.3. Air Quality

An Air Quality Assessment was prepared for the EIS and predicted that the potential air quality impacts could result from unloading, processing and discharging of liquid organic waste, used oil and industrial oily water; vehicle movements and road dust on trafficked areas.

The nearest sensitive receptors are located to the north, approximately 420 m from the Site. Air sampling at the existing Seven Hills site (which was replaced by the new Glendenning facility) indicated that the highest odour emission rates occur during the filling of liquid waste tanks. VOCs that were identified in the air samples include chloroform, tetrachloroethene and toluene.

The results of the air modelling, indicates compliance with the air quality criteria for all modelled pollutants by a significant margin.

An odour audit carried out on 18 February 2021 (Trinity Consultants Australia Pty Ltd report dated 8 April 2023) 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. The activated carbon drum that is provided for the unloading of waste oil to trucks in the waste oil area was considered to be an improvement in odour management measures adopted since commencement and since the previous odour audit carried out on 22 August 2018.

No odour or dust complaints were received during the Audit Period and therefore no remedial actions/additional mitigation measures were required to be implemented during the Audit period.

3.11.4. Biodiversity

The EIS predicted that there will be no changes to ecological values from the development as the development is located within a fully developed impervious site (all buildings and concrete pavement, except for perimeter landscaping) and all activities are undertaken within bunded areas within buildings. There are also adequate spill control mechanisms and no process water is discharged from the site other than to sewer.

No relevant predictions for pests, vermin nor noxious weeds are provided in the EIS.

No complaints related to biodiversity, vermin, pest and noxious weeds were received during the Audit period and therefore no additional remedial actions / mitigation measures were required to be implemented during the Audit period.

3.11.5. Traffic

A Traffic Impact Assessment was prepared for the EIS and predicted that the development would generate a car parking requirement of 20 parking spaces based on the parking rates provided within the Blacktown City Council's DCP. The Site provides a total of 28 passenger vehicle parking spaces on-site, including one (1) mobility parking space and an additional 14 commercial vehicle parking spaces for use by truck drivers. The parking layout was designed in accordance with the relevant Australian Standards and as determined during the Audit, operates safely and efficiently.

The development was predicted to generate 19 vehicle trips during the AM and PM peak hour periods. The predicted development traffic represents approximately 3.5% of existing traffic along Owen Street. Due to the low volume of traffic generated by the development, it was predicted that the function or safety of the road and associated intersections would not be compromised and as such mitigation measures were not recommended.

Swept path diagrams prepared for the site show safe site access and maneuverability for B-Doubles and semi-trailers whilst performing their necessary duties on-site.

All drivers must adhere to the Heavy Vehicle Parking Protocol (Attachment 30 of the OEMP), including the following which is encompassed within the site induction:

- All vehicles are required to enter and leave the Facility in a forward direction to ensure that there is no circumstance where a vehicle is required to reverse onto Rayben Street;
- The Facilities Manager is responsible for appropriate scheduling of waste deliveries to always ensure that there is no queuing traffic waiting to enter the Facility; and
- At no time are heavy vehicles instructed to park or queue on Rayben Street.

No complaints related to traffic were received during the Audit period and therefore no additional remedial actions / mitigation measures were required to be implemented during the Audit period.

3.11.6. Surface water

The EIS predicted that there will be no changes to surface water conditions from the development. The development is located within a fully developed impervious site (all buildings and concrete pavement, except for perimeter landscaping). All activities will be undertaken within bunded areas within buildings.

There are also adequate spill control mechanisms proposed and no process water will be discharged from the site other than to sewer.

Roof water is collected in a rainwater tank for reuse and any discharge from the tank will be treated prior to discharge to the Site's existing stormwater system.

3.11.7. Groundwater

The EIS predicted that there will be no changes to groundwater conditions from the development. The development is located within a fully developed impervious site (all buildings and concrete pavement, except for perimeter landscaping). All activities will be undertaken within bunded areas within buildings.

There are also adequate spill control mechanisms proposed and no process water will be discharged from the site other than to sewer.

3.11.8. Summary

The Audit evidence suggests that the Glendenning LWF operations are well managed, with good control of odour, noise and vibration, spill avoidance, traffic management and surface water management. This would suggest that the mitigation measures in the OEMP are effective in managing the predicted environmental impacts from the EIS.

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

As a result, the Site is generally operated in accordance with the Conditions of Consent for SSD 6767 and the conditions of EPL 21053.

3.12. Site inspection

A site inspection was conducted on 4th December 2023. This inspection was supported by JJ Richards staff. Photographs taken during the site inspection are provided in Appendix D.

3.13. Site interview

A summary of the evidence collected during the interview of JJ Richards staff on 4th December 2023 to support the compliance assessment is provided throughout this Audit Report and in particular in Appendix A.

3.14. Improvement opportunities

JJ Richards has indicated that there are continuous improvement opportunities for operator training and procedures which is an ongoing process.

There are no additional building works or site improvements scheduled for the Site.

3.15. Key strengths

JJ Richards has extensive management plans in place to assist in ensuring that the development is operated in accordance with the Conditions of Consent for SSD 6767 and the conditions of EPL 21053. JJ Richards implements all measures to prevent and/or minimise any harm to the environment that may result from the operation of the Glendenning LWF.

The Audit team found that the Site is operated by JJ Richards to a good standard. All procedures relating to the operation of the development are effectively implemented however improvements are required to ensure the risk of on or off-site environmental incidents remains low (refer to Section 4).

4. Recommendations

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

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

Item No.	Reference	Observation / Non-compliance	Recommended Action	Timeframe for completion / implementation	Date completed
SSD 6767 Conditions of Consent					
1	A2 and A10	Refer to Section 3.3 of the audit report.	Obtain Occupation Certificate from Blacktown City Council for the small enclosure that was approved under CDC-22-00390 built within the warehouse to house the KDS Separator for solid / liquid separation.	1 month	
2	B3	Refer to Section 3.3 of the audit report.	Ensure regular training is provided to liquid collection drivers (including contractors) as well as sales representatives in relation to the collection of grease trap waste and what actions to take where there is uncertainty being collected prior to collection.	Ongoing	
3	B4	Refer to Section 3.3 of the audit report.	Ensure regular training is provided to liquid collection drivers (including contractors) as well as sales representatives in relation to the collection of grease trap waste and what actions to take where there are concerns about the nature of a waste being collected prior to collection.	Ongoing	
4	C7	Refer to Section 3.3 of the audit report.	Provide training to management in relation to the reporting requirements under Condition C7 of SSD 6767.	Ongoing	
EPL 21053 licence conditions					
5	O1.1	Refer to Section 3.3 of the audit report.	Ensure regular training is provided to liquid collection drivers (including contractors) as well as sales representatives in relation to the collection of grease trap waste and what actions to take where there is uncertainty about the nature of a waste being collected prior to collection.	Ongoing	
6	O5.2	Refer to Section 3.3 of the audit report.	Ensure regular training is provided to liquid collection drivers (including contractors) as well as sales representatives in relation to the collection of grease trap waste and what actions to take where there is uncertainty about the nature of a waste being collected prior to collection.	Ongoing	

Appendix A – Independent Audit Tables

Table A.1. Audit table outlining compliance the conditions of consent under State Significant Development 6767 (including Mods 1-2).

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.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>An Operational Environmental Management Plan (OEMP) Version: 1.15 (dated August 2023) has been implemented for the management of environmental risk at the Glendenning Liquid Waste Facility.</p> <p>Two non-compliances were identified against Part B of the conditions of consent. Refer to Section 3.3 of the Audit report for information on the non-compliance</p>	Non-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. 	<ul style="list-style-type: none"> Stamped Plans issued 08/06/2022 Complying Development Certificate number CDC-22-00390 	In August 2023 a small odour proof enclosure was built within the warehouse to house the KDS Separator for solid / liquid separation. The construction of the enclosure was approved by Blacktown City Council as Complying Development (certificate number CDC-22-00390) on 8 June 2022. The small odour proof enclosure is currently being used however the Occupation Certificate for the development is yet to be obtained from Blacktown City Council.	Non-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.	<ul style="list-style-type: none"> The findings from this audit 	No inconsistency have been identified.	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. 	<ul style="list-style-type: none"> • The findings from this audit 	No requirements have been provided from the Secretary arising from the Department.	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.	<ul style="list-style-type: none"> • The findings from this audit 	Development Consent SSD 6767 was issued on 11/01/2017, 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).	<ul style="list-style-type: none"> • FRM-NSW-ACT-111 Daily Liquid Food Waste Dispatch; • FRM-NSW-ACT-112 Daily Oily Water Reveal; • FRM-NSW-ACT-113 Daily Organic Waste Reveal Form; • FRM-NSW-ACT-114 Daily Treated Grease Trap Sludge Dispatch Form; • FRM-NSW-ACT-115 Daily Waste Oil Dispatch Form; and • FRM-NSW-ACT-116 Daily Waste Oil Reveal Form. • Waste Inventory Spreadsheet • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>The Waste Monitoring Program is documented in Section 29 of the OEMP.</p> <p>The site processed the following quantities of liquid waste:</p> <ul style="list-style-type: none"> • 2021: 44,627.30 tonnes • 2022: 35,910.97 tonnes • 2023: 40,610.08 tonnes 	Compliant
STATUTORY REQUIREMENTS				

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
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.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023 Environment Protection Licence (EPL) 21053 Variation to EPL 21053 dated 4/12/2023 	On 28 th November 2023, The NSW EPA amended Condition L2.2 to increase the quantity of waste stored at any one time at the premises from 1,212 tonnes to 1,385 kilolitres (where 1 tonne is equivalent to 1 kilolitre).	Compliant
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).	<ul style="list-style-type: none"> Stamped Plans issued 08/06/2022. 	None	Compliant
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.	<ul style="list-style-type: none"> Fire safety Statement dated 13/9/2023. 	None	Compliant
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>	<ul style="list-style-type: none"> • Stamped Plans issued 08/06/2022 • Complying Development Certificate number CDC-22-00390 	<p>In August 2023 a small odour proof enclosure was built within the warehouse to house the KDS Separator for solid / liquid separation. The construction of the enclosure was approved by Blacktown City Council as Complying Development (certificate number CDC-22-00390) on 8 June 2022. The small odour proof enclosure is currently being used however the Occupation Certificate for the development is yet to be obtained from Blacktown City Council.</p>	Non-Compliant
	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>	<ul style="list-style-type: none"> • The findings from this audit 	<p>Consent condition is not within the scope of this Audit as it is related to the construction of the Development.</p>	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>	<ul style="list-style-type: none"> The findings from this audit 	<p>Notices of Surrender of Development Consent for the following consents were provided to Blacktown Council on 28/11/2017:</p> <ul style="list-style-type: none"> BA-93-4570; DA-93-263; and IA-97-3020. 	Compliant
STAGED SUBMISSION OF PLANS OR PROGRAMS				
A13	<p>With the approval of the Secretary, the Applicant may:</p> <ol style="list-style-type: none"> submit any strategy, plan or program required by this consent on a progressive basis; and/or combine any strategy, plan or program required by this consent. 	<ul style="list-style-type: none"> The findings from this audit 	Consent condition is not within the scope of this Audit.	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>	<ul style="list-style-type: none"> The findings from this audit 	Consent condition is not within the scope of this Audit.	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. 	<ul style="list-style-type: none"> The findings from this audit 	Consent condition is not within the scope of this Audit.	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. 	<ul style="list-style-type: none"> Facilities manual dated 24/02/2023 Hydrocarbon Aggregation – Weekly Site Checklist Daily Site Checklist Training records OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>Procedures for plant and equipment maintenance and repair are documented in Section 17 of the OEMP.</p> <p>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. Training records for relevant site personnel were sighted.</p>	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. 	<ul style="list-style-type: none"> The findings from this audit 	Consent condition is not within the scope of this Audit.	Not Triggered
PART B – ENVIRONMENTAL PERFORMANCE				

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	WASTE MANAGEMENT			
B1	The Applicant shall not cause, permit or allow any materials or waste (as defined by the POEO Act) generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by an EPL.	<ul style="list-style-type: none"> • FRM-NSW-ACT-111 Daily Liquid Food Waste Dispatch; • FRM-NSW-ACT-112 Daily Oily Water Reveal; • FRM-NSW-ACT-113 Daily Organic Waste Reveal Form; • FRM-NSW-ACT-114 Daily Treated Grease Trap Sludge Dispatch Form; • FRM-NSW-ACT-115 Daily Waste Oil Dispatch Form; and • FRM-NSW-ACT-116 Daily Waste Oil Reveal Form. • Waste Inventory Spreadsheet • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023.Waste 	<p>The Waste Monitoring Program is documented in Section 29 of the OEMP.</p> <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 1212⁵ tonnes. The total amount of waste received and processed at the Premises must not exceed 62,000 tonnes per annum.</p>	Compliant

⁵ On 28-Nov-2023, The NSW EPA amended Condition L2.2 to increase the quantity of waste stored at any one time at the premises from 1212 tonnes to 1385 kilolitres.

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. 	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>The Waste Monitoring Program is documented in Section 29 of the OEMP.</p> <p>The original Waste Monitoring Program implemented at the commencement of the plant was approved by DPE on 22 November 2017.</p>	Compliant
B3	<p>The Applicant shall ensure the transportation of waste is:</p> <ul style="list-style-type: none"> p) undertaken by a transporter authorised to transport such wastes; and q) to a place that can lawfully accept that waste. 	<ul style="list-style-type: none"> • Daily Treated GTW Dispatch Register • Waste Inventory Spreadsheet • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. • <i>The JJ Richards Glendenning and Hume treated grease trap waste order 2022.</i> 	<p>The Waste Monitoring Program is documented in Section 29 of the OEMP.</p> <p>Supplier and subcontractor management is documented in Section 9 of the OEMP.</p> <p>Treated Grease Trap Waste is applied to land at JJ Richards Marulan Farm under <i>The JJ Richards Glendenning and Hume treated grease trap waste order 2022.</i></p> <p>Refer to Section 3.3 of the Audit report for information on the non-compliance.</p>	Non-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. 	<ul style="list-style-type: none"> • Sydney Waste Corporation Consent to Discharge Industrial Trade Wastewater 39115 (Activity Grease Trap Waste Disposal) dated 09/06/2023. • Sydney Water Inspection Report dated 25/09/2023. 	<p>Waste is appropriately disposed of at suitably licensed facilities and/or to sewer as Trade Waste.</p> <p>Refer to Section 3.3 of the Audit report for information on the non-compliance.</p>	Non-Compliant
	AIR QUALITY			
	<i>Meteorological Monitoring</i>			
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>	<ul style="list-style-type: none"> • The findings from this audit and the site inspection carried out on 05/12/2023. • Meteorological station data • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>Meteorological monitoring is documented in Section 28.1 of the OEMP.</p> <p>Supporting meteorological station records for the period 19/09/2023-26/09/2023 were verified.</p>	Compliant
	<i>Construction Mitigation</i>			
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 	<ul style="list-style-type: none"> • The findings from this audit 	<p>Consent condition is not within the scope of this Audit.</p>	Not Triggered
	<i>Dust Management</i>			

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.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. Complaints Register OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>The site is sealed to mitigate the generation of dust from the premises and is regularly cleaned.</p> <p>Air quality management measures are documented in Section 22 of the OEMP.</p> <p>Traffic management measures are documented in Section 27 of the OEMP.</p> <p>No dust complaints have been received.</p>	Compliant
	<i>Odour</i>			

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)

Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B8	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. Complaints Register OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. Odour Management Plan – Attachment 37 OEMP. 	<p>Air quality management measures are documented in Section 22 of the OEMP.</p> <p>The wastes within the organics building are stored and processed in sealed tanks which are connected to the carbon filter via pipework within the building.</p> <p>The unloading, loading and transfer is undertaken by vacuum pump. The expressed air from the pump passes through an activated carbon filter prior to discharge into the atmosphere.</p> <p>The rollers doors to the organics building are kept closed at all times with the exception of the entry and exit of vehicles.</p> <p>The hydrocarbon tank farm is fitted with a vent pipe to manage any odorous loads received at the facility. Prior to unloading, any tankers with loads that are identified as being odorous connect to the vent pipe which passes through a carbon filter before being discharged to atmosphere. The vent pipe is directed through the roof of the hydrocarbon tank farm.</p> <p>No odour 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.	The findings from this audit	Consent condition is not within the scope of this Audit.	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
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.	The findings from this audit	Consent condition is not within the scope of this Audit.	Not Triggered
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. 	<ul style="list-style-type: none"> • The findings from this audit and the site inspection carried out on 05/12/2023. • Complaints Register • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. • Odour Management Plan – Attachment 37 OEMP. 	<p>Air quality management measures are documented in Section 22 of the OEMP.</p> <p>The wastes within the organics building are stored and processed in sealed tanks which are connected to the carbon filter via pipework within the building.</p> <p>The unloading, loading and transfer is undertaken by vacuum pump. The expressed air from the pump passes through an activated carbon filter prior to discharge into the atmosphere.</p> <p>The rollers doors to the organics building are kept closed at all times with the exception of the entry and exit of vehicles.</p>	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> <ol 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: <ol 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: <ol 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 	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. • Odour Management Plan – Attachment 37 OEMP. 	<p>The original Odour Management Plan approved by EPA NSW on 17 March 2017.</p> <p>The revised Odour Management Plan Version 3 dated September 2023 was approved by the Planning Secretary on 4 October 2023.</p>	<p>Compliant</p>
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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.	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. • Odour Management Plan – Attachment 37 OEMP. • The findings from this audit and the site inspection carried out on 05/12/2023. • Complaints Register 	Air quality management measures are documented in Section 22 of the OEMP.	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> <ol style="list-style-type: none"> be carried out by a suitably qualified, experienced and independent expert(s) whose appointment has been endorsed by the Secretary; audit the Development whilst in full operation and during receipt of organic waste; include sampling and analysis undertaken in accordance with an EPL; include a summary of air and odour emission related complaints and any actions that were carried out to address the complaints; 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; validate the Development against the odour predictions in the EIS and RTS; review design and management practices of the Development against industry best practice for air emissions and odour management; and 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>	<ul style="list-style-type: none"> Odour Audit prepared by Trinity Consultants Australia Pty Ltd dated 8 April 2023. 	<p>The odour audit carried out on 18/02/2021 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.</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.	<ul style="list-style-type: none"> Odour Audit prepared by Trinity Consultants Australia Pty Ltd dated 8 April 2023. 	None	Compliant													
B16	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Air Emissions Audit.	<ul style="list-style-type: none"> Odour Audit prepared by Trinity Consultants Australia Pty Ltd dated 8 April 2023. 	No requirements were made out of the Odour Audit.	Compliant													
	NOISE AND VIBRATION																
	Construction and Operation Hours																
B17	<p>The Applicant shall comply with the construction and operation hours in Table 1 unless otherwise agreed to in writing by the Secretary.</p> <table border="1"> <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 pm</td> </tr> <tr> <td>Saturday</td> <td>8 am to 1 pm</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 pm</td> </tr> </tbody> </table>	Activity	Day	Hours	Construction	Monday – Friday	7 am to 6 pm	Saturday	8 am to 1 pm	Sunday & Public Holidays	Nil	Operation	Monday – Saturday	4 am to 9 pm	<ul style="list-style-type: none"> The findings from this audit 	Receival and dispatch of waste occurs in accordance with the condition.	Compliant
Activity	Day	Hours															
Construction	Monday – Friday	7 am to 6 pm															
	Saturday	8 am to 1 pm															
	Sunday & Public Holidays	Nil															
Operation	Monday – Saturday	4 am to 9 pm															
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.	<ul style="list-style-type: none"> The findings from this audit 	No deliveries of material to the site occurred outside of approved operational hours.	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. 	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. • The findings from this audit and the site inspection carried out on 05/12/2023. • Complaints Register 	<p>Noise management measures are documented in Section 23 of the OEMP.</p> <p>Traffic management measures are documented in Section 27 of the OEMP.</p> <p>No noise complaints have been received.</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 1037"> <thead> <tr> <th colspan="2">Table 2: Operational Noise Limits</th> </tr> <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>	Table 2: Operational Noise Limits		Receiver/location	Day/Evening/Night L _{Aeq} (15 minutes)	Receptor groups 1 and 2*	36	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. • The findings from this audit and the site inspection carried out on 05/12/2023. • Complaints Register 	<p>Noise management measures are documented in Section 23 of the OEMP.</p> <p>Traffic management measures are documented in Section 27 of the OEMP.</p> <p>No noise complaints have been received.</p>	Compliant
Table 2: Operational Noise Limits										
Receiver/location	Day/Evening/Night L _{Aeq} (15 minutes)									
Receptor groups 1 and 2*	36									
	Noise Compliance Measurement									
B21	<p>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>	<ul style="list-style-type: none"> • The findings from this audit and the site inspection carried out on 05/12/2023. • Complaints Register 	<p>No noise complaints have been received</p>	Not Triggered						
	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.	<ul style="list-style-type: none"> Section 73 Compliance Certificate under the Sydney Water Act 1994 dated 31/05/2017. 	None	Compliant
B23	Prior to the discharge of any waste to sewer, the Applicant shall enter into a Trade Waste Agreement with Sydney Water.	<ul style="list-style-type: none"> Sydney Waste Corporation Consent to Discharge Industrial Trade Wastewater 39115 (Activity Grease Trap Waste Disposal) dated 09/06/2023. Sydney Water Inspection Report dated 25/09/2023. 	Waste is appropriately disposed of at suitably licensed facilities and/or to sewer as Trade Waste.	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.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. Incident Register. 	No on-site reportable incidents have occurred in relation to pollution of water.	Not Triggered
	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 	<ul style="list-style-type: none"> Site inspection carried out on 05/12/2023. Maintenance manual for water quality improvement devices. Inspection sheet for SPEL pit inserts dated 09/06/2023 sighted. 	The site inspection identified one stormwater pit was full of standing water. Recommendations were made for the pit to be cleaned. It is noted that this was completed.	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</i> 1919 over the stormwater quality devices and rainwater tanks in accordance with the requirements of Council's <i>Engineering Guide for Development</i> 2005.	<ul style="list-style-type: none"> The findings from this audit 	Consent condition is not within the scope of this Audit.	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.	<ul style="list-style-type: none"> The findings from this audit 	Consent condition is not within the scope of this Audit.	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</i> 1919 over the on-site detention system in accordance with the requirements of Council's <i>Engineering Guide for Development</i> 2005.	<ul style="list-style-type: none"> The findings from this audit 	Consent condition is not within the scope of this Audit.	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).	<ul style="list-style-type: none"> The findings from this audit 	Consent condition is not within the scope of this Audit.	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</i> 2007.	<ul style="list-style-type: none"> OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. The findings from this audit and the site inspection carried out on 05/12/2023. 	<p>Spill management control measures are documented in Section 24.1 of the OEMP</p> <p>All liquid wastes and materials including chemicals, fuels and oils used on-site in appropriately banded areas.</p> <p>The wastes within the organics building are stored and processed in sealed tanks.</p> <p>No spills were observed at the Site.</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
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. 	<ul style="list-style-type: none"> • The findings from this audit 	Consent condition is not within the scope of this Audit.	Not Triggered
	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. 	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. • The findings from this audit and the site inspection carried out on 05/12/2023. 	<p>Traffic management is documented in Section 27 of the OEMP.</p> <p>Attachment 30 of the OEMP documents the Heavy Vehicle 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. 	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>Traffic management is documented in Section 27 of the OEMP.</p> <p>A Drivers Code of Conduct is documented in the OEMP. Requirements of the Code are included in the Site Orientation document which all relevant persons must complete prior to loading/unloading waste at the site.</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. 	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. • Incident Register. 	<p>Emergency Planning and Management is documented in Section 19 of the OEMP.</p> <p>No reportable fire incidents have occurred.</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>	<ul style="list-style-type: none"> • The findings from this audit 	<p>Consent condition is not within the scope of this Audit.</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>	<ul style="list-style-type: none"> • The findings from this audit 	<p>Consent condition is not within the scope of this Audit.</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>	<ul style="list-style-type: none"> The findings from this audit 	Consent condition is not within the scope of this Audit.	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>	<ul style="list-style-type: none"> The findings from this audit 	Consent condition is not within the scope of this Audit.	Not Triggered
SECURITY				
B39	<p>The Applicant shall:</p> <ol style="list-style-type: none"> install and maintain a perimeter fence and security gates on the site; and ensure that the security gates on site are locked whenever the site is unattended. 	<ul style="list-style-type: none"> OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. The findings from this audit and the site inspection carried out on 05/12/2023. 	<p>Site Security is documented in Section 26 of the OEMP.</p> <p>Security fence installed around site with gates locked by last person on site daily.</p>	Compliant
PARTC – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
ENVIRONMENTAL MANAGEMENT				

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	Construction Environmental Management Plan			
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> <ol style="list-style-type: none"> be prepared by a suitably qualified and experienced person(s); describe all activities to be undertaken on the site during construction, including a clear indication of construction stages; identify the statutory approvals that apply to the Development; 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; detail how the environmental performance of construction will be monitored, and what actions will be taken to address identified adverse environmental impacts; describe the roles and responsibilities for all relevant employees involved in construction; include arrangements for community consultation and complaints handling procedures during construction; and consolidate the construction related parts of any management plans and monitoring programs required in the conditions of this consent 	<ul style="list-style-type: none"> The findings from this audit 	Consent condition is not within the scope of this Audit.	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
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.	<ul style="list-style-type: none"> The findings from this audit 	Consent condition is not within the scope of this Audit.	Not Triggered
	Operational Environmental Management Plan			

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C3	<p>The Applicant shall prepare an Operational Environmental Management Plan for the Development to the satisfaction of the Secretary. This strategy must:</p> <ol style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s); b) provide a strategic framework for environmental management of the Development; c) identify the statutory approvals that apply to the Development; d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development; e) describe in general how the environmental performance of the Development would be monitored and managed including the management of out of hours heavy vehicle parking; and f) describe the procedures that would be implemented to: <ol style="list-style-type: none"> i. keep the local community and relevant agencies informed about the operation and environmental performance of the Development; ii. receive, handle, respond to, and record complaints; iii. resolve any disputes that may arise; iv. respond to any non-compliance; and v. respond to emergencies 	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>The original OEMP was approved by the Secretary on 22/11/2017.</p> <p>The revised OEMP, Version 1.15 dated August 2023 was approved by the Planning Secretary on 4 October 2023.</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	<ul style="list-style-type: none"> OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>The Development is carried out in accordance with the Operational Environmental Management Plan approved by the Secretary. The original OEMP was approved by the Secretary on 22/11/2017.</p> <p>The revised OEMP, Version 1.15 dated August 2023 was approved by the Planning Secretary on 4 October 2023.</p>	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 	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>The Development is carried out in accordance with the Operational Environmental Management Plan approved by the Secretary. The original OEMP was approved by the Secretary on 22/11/2017.</p> <p>The revised OEMP, Version 1.15 dated August 2023 was approved by the Planning Secretary on 4 October 2023.</p> <p>The following sections of the OEMP document the relevant requirements under this condition:</p> <ul style="list-style-type: none"> • Section 3 - Relevant Statutory Requirements • Section 7 - Consultation and Communication • Section 12 - Corrective Action System • Section 20 - Incident Management • Section 21 - Complaints Management • Section 28 - Monitoring and Review 	<p>Compliant</p>
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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 C5 if they are unnecessary or unwarranted for particular management plans/strategies	The findings from this audit	This condition has not been triggered.	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.	<ul style="list-style-type: none"> OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. Incident Register. Email from Kurt Whalan to the NSW EPA dated 01/06/2023. Email from Kurt Whalan to the NSW EPA dated 10/08/2023. Incident Report prepared by JJ Richards dated 16/06/2023. Advisory Letter from the NSW EPA dated 06/07/2023. 	<p>JJ Richard’s notified the NSW EPA on 1/06/2023 by telephoning the Environment Line service and via email in relation to approximately 21,000 Litres of Oily Water (J120) mixed with treated Grease Trap Waste (TGTW) being injected into land described as Plot 2 of Paddock 3B, at 152 Medway Road Marulan Farm, NSW 2579.</p> <p>The Secretary was not notified of the incident.</p> <p>Refer to Section 3.3 of the Audit report for information on the non-compliance.</p>	Non-Compliant
	Regular Reporting		<p>The Incident Report prepared by JJ Richards dated 16/06/2023 was not provided within 7 days of the date on which the incident occurred.</p> <p>(Refer to Section 3.3 of the Audit report for information on the non-compliance).</p>	
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.	<ul style="list-style-type: none"> JJ’s public website: https://www.jjrichards.com.au/environment/. 	<p>The relevant annual review and Independent Environmental Audit is available on JJ Richard’s public website.</p> <p>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.</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
	<i>Independent Environmental Audit</i>			
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> <ol style="list-style-type: none"> be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Secretary; be led by a suitably qualified auditor, and include experts in fields specified by the Secretary; include consultation with the relevant agencies; include a full odour audit of the Development, taking into consideration the relevant technical guidelines and any odour complaints made since the previous audit; 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); review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents. 	<ul style="list-style-type: none"> 2021 Independent Environmental Audit prepared by Jackson Environment and Planning Pty dated 09/04/2021. 	<p>The 2021 Independent Environmental Audit was conducted by Jackson Environment and Planning Pty Ltd in March 2021. The Audit was limited to the period between 15th June 2018 and 11th January 2021.</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
C10	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.	<ul style="list-style-type: none"> Evidence of submission 	The 2021 Independent Environmental Audit was submitted to the Secretary on 09/04/2021.	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. 	<ul style="list-style-type: none"> • Annual Review 2021 dated 11/01/2022 • Annual Review 2022 dated 11/01/2023 • Annual Review 2023 dated 11/01/2024 			<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>	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	The review and revision of any strategies, plans and programs required under the consent is documented in Section 28.6 of the OEMP.	Compliant
C13	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.	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	Monitoring and Review is documented in Section 28 of the OEMP.	Compliant

Table A.2. Audit table outlining compliance the licence conditions under Environment Protection Licence 21053.

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> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Waste processing (non-thermal treatment)</td> <td>Non-thermal treatment of liquid waste</td> <td>Any annual processing capacity</td> </tr> <tr> <td>Waste storage</td> <td>Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste</td> <td>Any listed waste type stored</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Waste processing (non-thermal treatment)	Non-thermal treatment of liquid waste	Any annual processing capacity	Waste storage	Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	Any listed waste type stored	<ul style="list-style-type: none"> EPL 21053 	None.	Compliant
Scheduled Activity	Fee Based Activity	Scale											
Waste processing (non-thermal treatment)	Non-thermal treatment of liquid waste	Any annual processing capacity											
Waste storage	Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	Any listed waste type stored											
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>	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. EPL 21053 	JJ Richard’s website provides the address of the Site and was confirmed during the site inspection.	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. 	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	The Development is carried out in accordance with the Operational Environmental 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 853 1090"> <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>Location Description</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>Location as shown on site map in attachment to email titled 'R4656-90-08 (CP-WS LOCATION) DOC18/178813</td> </tr> </tbody> </table>	Air				EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Stack from odour control system in the Organic Waste Building	Stack from odour control system in the Organic Waste Building	Location as shown on site map in attachment to email titled 'R4656-90-08 (CP-WS LOCATION) DOC18/178813	<ul style="list-style-type: none"> • Post-commissioning odour testing was undertaken on 28 August 2018. • FRM-NSW-ACT-118 Daily Odour Checklist. 	<p>Monitoring point 1 requires a Special Frequency which refers to once off Post Commissioning Monitoring.</p> <p>An odour check of the carbon filter outlet is conducted daily and recorded via FRM-NSW-ACT-118 Daily Odour Checklist.</p> <p>The Post Commissioning Odour Audit was prepared by Air Noise Environment dated 27/09/2018.</p>	Compliant
Air																
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description													
1	Stack from odour control system in the Organic Waste Building	Stack from odour control system in the Organic Waste Building	Location as shown on site map in attachment to email titled 'R4656-90-08 (CP-WS LOCATION) DOC18/178813													

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 description</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>Meteorological Station</td> <td>Location as shown on site map in attachment to email titled "R4456-30-08 (CF_WS LOCATION) DOC1&178813"</td> </tr> </tbody> </table>	Noise/Weather			EPA identification no.	Type of monitoring point	Location description	2	Meteorological Station	Location as shown on site map in attachment to email titled "R4456-30-08 (CF_WS LOCATION) DOC1&178813"	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. Meteorological station data OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>Meteorological monitoring is documented in Section 28.1 of the OEMP.</p> <p>Supporting meteorological station records for the period 19/09/2023-26/09/2023 were verified.</p>	Compliant
Noise/Weather													
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2	Meteorological Station	Location as shown on site map in attachment to email titled "R4456-30-08 (CF_WS LOCATION) DOC1&178813"											
3	LIMIT CONDITIONS												
L1	Pollution of waters												
L1.1	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> .	OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023.	The Development is carried out in accordance with the Operational Environmental Management Plan.	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" data-bbox="297 778 842 1007"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> <th>Other Limits</th> </tr> </thead> <tbody> <tr> <td>J100</td> <td>Waste mineral oils unfit for their original intended use</td> <td></td> <td>Waste storage Waste processing (non-thermal treatment)</td> <td>Processing by gravity separation and filtering only</td> </tr> <tr> <td>J120</td> <td>Waste oil/hydrocarbons mixtures/emulsions in water</td> <td></td> <td>Waste processing (non-thermal treatment)</td> <td></td> </tr> <tr> <td>K120</td> <td>Liquid Food Waste</td> <td></td> <td>Waste storage Waste processing (non-thermal treatment)</td> <td></td> </tr> <tr> <td>K110</td> <td>Grease trap waste</td> <td></td> <td>Waste storage Waste processing (non-thermal treatment)</td> <td></td> </tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	J100	Waste mineral oils unfit for their original intended use		Waste storage Waste processing (non-thermal treatment)	Processing by gravity separation and filtering only	J120	Waste oil/hydrocarbons mixtures/emulsions in water		Waste processing (non-thermal treatment)		K120	Liquid Food Waste		Waste storage Waste processing (non-thermal treatment)		K110	Grease trap waste		Waste storage Waste processing (non-thermal treatment)		<ul style="list-style-type: none"> FRM-NSW-ACT-111 Daily Liquid Food Waste Dispatch; FRM-NSW-ACT-112 Daily Oily Water Receive; FRM-NSW-ACT-113 Daily Organic Waste Receive Form; FRM-NSW-ACT-114 Daily Treated Grease Trap Sludge Dispatch Form; FRM-NSW-ACT-115 Daily Waste Oil Dispatch Form; and FRM-NSW-ACT-116 Daily Waste Oil Receive Form. Waste Inventory Spreadsheet OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>The Waste Monitoring Program is documented in Section 29 of the OEMP.</p> <p>The site processed the following quantities of liquid waste:</p> <ul style="list-style-type: none"> 2021: 44,627.30 tonnes 2022: 35,910.97 tonnes 2023: 40,610.08 tonnes 	Compliant
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L2.2	<p>The quantity of waste stored at any one time at the premises must not exceed 1,212 tonnes.</p>	<ul style="list-style-type: none"> Waste Inventory Spreadsheet 	<p>On 28th November 2023, The NSW EPA amended Condition L2.2 to increase the quantity of waste stored at any one time at the premises from 1212 tonnes to 1385 kilolitres.</p> <p>The site cannot physically store more liquid waste than permitted due to limitations in storage capacity</p>	Compliant																									

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
L2.3	The total amount of waste received and processed at the Premises must not exceed 62,000 tonnes per annum.	<ul style="list-style-type: none"> FRM-NSW-ACT-111 Daily Liquid Food Waste Dispatch; FRM-NSW-ACT-112 Daily Oily Water Reveal; FRM-NSW-ACT-113 Daily Organic Waste Reveal Form; FRM-NSW-ACT-114 Daily Treated Grease Trap Sludge Dispatch Form; FRM-NSW-ACT-115 Daily Waste Oil Dispatch Form; and FRM-NSW-ACT-116 Daily Waste Oil Reveal Form. Waste Inventory Spreadsheet OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>The Waste Monitoring Program is documented in Section 29 of the OEMP.</p> <p>The site processed the following quantities of liquid waste:</p> <ul style="list-style-type: none"> 2021: 44,627.30 tonnes 2022: 35,910.97 tonnes 2023: 40,610.08 tonnes 	Compliant
L3	<i>Potentially offensive odour</i>			

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
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>	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. Complaints Register OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. Odour Management Plan – Attachment 37 OEMP. 	<p>Air quality management measures are documented in Section 22 of the OEMP.</p> <p>The wastes within the organics building are stored and processed in sealed tanks which are connected to the carbon filter via pipework within the building.</p> <p>The unloading, loading and transfer is undertaken by vacuum pump. The expressed air from the pump passes through an activated carbon filter prior to discharge into the atmosphere.</p> <p>The rollers doors to the organics building are kept closed at all times with the exception of the entry and exit of vehicles.</p> <p>The hydrocarbon tank farm is fitted with a vent pipe to manage any odorous loads received at the facility. Prior to unloading, any tankers with loads that are identified as being odorous connect to the vent pipe which passes through a carbon filter before being discharged to atmosphere. The vent pipe is directed through the roof of the hydrocarbon tank farm.</p> <p>No odour complaints have been received.</p>	Compliant
4	OPERATING CONDITIONS			
O1	<i>Activities must be carried out in a competent manner</i>			

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O1.1	Licensed activities must be carried out in a competent manner. This includes: c) the processing, handling, movement and storage of materials and substances used to carry out the activity; and d) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	<ul style="list-style-type: none"> OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	The Waste Monitoring Program is documented in Section 29 of the OEMP. Refer to Section 3.3 of the Audit report for information on the non-compliance.	Non-Compliant
O2	Maintenance of plant and equipment			
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	<ul style="list-style-type: none"> Facilities manual dated 24/02/2023 Hydrocarbon Aggregation – Weekly Site Checklist. Daily Site Checklist. Training records. OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	Procedures for plant and equipment maintenance and repair are documented in Section 17 of the OEMP. 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. Training records for relevant site personnel were sighted.	Compliant
O3	Emergency Response			
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> .	<ul style="list-style-type: none"> Pollution Incident Response Management Plan Version 10 dated October 2023. 	Pollution Incident Response Management Plan is current. The Pollution Incident Response Management Plan was last tested in April 2023.	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.	<ul style="list-style-type: none"> Pollution Incident Response Management Plan Version 10 dated October 2023. 	Pollution Incident Response Management Plan is current. The Pollution Incident Response Management Plan was last tested in April 2023.	Compliant
O4	Processes and management			

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
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.	<ul style="list-style-type: none"> OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. The findings from this audit and the site inspection carried out on 05/12/2023. 	<p>Spill management control measures are documented in Section 24.1 of the OEMP.</p> <p>All liquid wastes and materials including chemicals, fuels and oils used on-site are stored in appropriately bunded areas.</p> <p>The wastes within the organics building are stored and processed in sealed tanks.</p> <p>No spills were observed at the Site.</p>	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.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. 	<p>Spill management control measures are documented in Section 24.1 of the OEMP.</p> <p>No spills were observed at the Site.</p>	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.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>Air quality management measures are documented in Section 22 of the OEMP.</p> <p>The wastes within the organics building are stored and processed in sealed tanks which are connected to the carbon filter via pipework within the building.</p>	Compliant
O4.4	The Dissolved Air Floatation Unit must be contained in a sealed room vented to the activated carbon filter.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>The DAF is contained within a sealed room within the organics plant.</p>	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.	<ul style="list-style-type: none"> FRM-NSW-ACT-111 Daily Liquid Food Waste Dispatch; FRM-NSW-ACT-112 Daily Oily Water Reveal; FRM-NSW-ACT-113 Daily Organic Waste Reveal Form; FRM-NSW-ACT-114 Daily Treated Grease Trap Sludge Dispatch Form; FRM-NSW-ACT-115 Daily Waste Oil Dispatch Form; and FRM-NSW-ACT-116 Daily Waste Oil Reveal Form. Waste Inventory Spreadsheet OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	The Waste Monitoring Program is documented in Section 29 of the OEMP.	Compliant
O5.2	If waste is transported from the premises, the licensee must ensure that the waste is transported: <ol style="list-style-type: none"> by a waste transporter authorised to transport such waste; and to a place that can lawfully accept that waste. 		Refer to Section 3.3 of the Audit report for information on the non-compliance.	Non-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.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. 	Tanks, pipe and hoses are equipped with relevant control valves to prevent the spillage of waste. In addition, equipment is contained within appropriately banded areas in the event of a spillage.	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.	<ul style="list-style-type: none"> OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	Documentation and Records Management are documented in Section 13 of the OEMP.	Compliant

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility																												
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status																								
M1.2	All records required to be kept by this licence must be: <ol style="list-style-type: none"> in a legible form, or in a form that can readily be reduced to a legible form; kept for at least 4 years after the monitoring or event to which they relate took place; and produced in a legible form to any authorised officer of the EPA who asks to see them. 	<ul style="list-style-type: none"> OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	Documentation and Records Management are documented in Section 13 of the OEMP.	Compliant																								
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: <ol style="list-style-type: none"> the date(s) on which the sample was taken; the time(s) at which the sample was collected; the point at which the sample was taken; and the name of the person who collected the sample. 	<ul style="list-style-type: none"> OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	Documentation and Records Management are documented in Section 13 of the OEMP.	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:	<ul style="list-style-type: none"> The findings from this audit. 	No monitoring has been carried out during the Audit period. Monitoring point 1 requires a Special Frequency which refers to once off Post Commissioning Monitoring.	Compliant																								
M2.2	Air Monitoring Requirements <table border="1" data-bbox="297 1077 862 1200"> <thead> <tr> <th colspan="4">POINT 1</th> </tr> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Odour</td> <td>odour units</td> <td>Special Frequency 1</td> <td>OM-7</td> </tr> <tr> <td>Temperature</td> <td>degrees Celsius</td> <td>Special Frequency 1</td> <td>TM-2</td> </tr> <tr> <td>Velocity</td> <td>metres per second</td> <td>Special Frequency 1</td> <td>TM-2</td> </tr> <tr> <td>Volumetric flowrate</td> <td>cubic metres per second</td> <td>Special Frequency 1</td> <td>TM-2</td> </tr> </tbody> </table>	POINT 1				Pollutant	Units of measure	Frequency	Sampling Method	Odour	odour units	Special Frequency 1	OM-7	Temperature	degrees Celsius	Special Frequency 1	TM-2	Velocity	metres per second	Special Frequency 1	TM-2	Volumetric flowrate	cubic metres per second	Special Frequency 1	TM-2	<ul style="list-style-type: none"> Post-commissioning odour testing was undertaken on 28 August 2018. 	Monitoring point 1 requires a Special Frequency which refers to once off Post Commissioning Monitoring. The Post Commissioning Odour Audit was prepared by Air Noise Environment dated 27/09/2018.	Compliant
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M2.3	Special Frequency 1 refers to once off Post Commissioning Monitoring	<ul style="list-style-type: none"> None 	None	Not Triggered																								
M2.4	Selection of sampling position for Point 1 must comply with the sampling method TM-1.	<ul style="list-style-type: none"> None 	None	Not Triggered																								
M3	Testing methods - concentration limits																											

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility																																																	
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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>	<ul style="list-style-type: none"> • Post Commissioning Odour Audit was prepared by Air Noise Environment dated 27/09/2018. 	<p>Post-commissioning odour testing was undertaken on 28 August 2018 in accordance with the requirements under the EPL.</p>	Compliant																																													
M4	Weather monitoring																																																
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" data-bbox="297 1189 853 1385"> <thead> <tr> <th colspan="5">POINT 2</th> </tr> <tr> <th>Parameter</th> <th>Sampling method</th> <th>Units of measure</th> <th>Averaging period</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Sling</td> <td>AM-1</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Sling</td> <td>AM-2</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Rainfall</td> <td>AM-4</td> <td>millimetres per hour</td> <td>1 hour</td> <td>Continuous</td> </tr> <tr> <td>Temperature at 2 metres</td> <td>AM-4</td> <td>degrees Celsius</td> <td>10 minutes</td> <td>Continuous</td> </tr> <tr> <td>Temperature at 10 metres</td> <td>AM-4</td> <td>degrees Celsius</td> <td>10 minutes</td> <td>Continuous</td> </tr> <tr> <td>Wind Speed at 10 metres</td> <td>AM-2 & AM-4</td> <td>metres per second</td> <td>10 minutes</td> <td>Continuous</td> </tr> <tr> <td>Wind Direction at 10 metres</td> <td>AM-2 & AM-4</td> <td>Degrees</td> <td>10 minutes</td> <td>Continuous</td> </tr> </tbody> </table>	POINT 2					Parameter	Sampling method	Units of measure	Averaging period	Frequency	Sling	AM-1	-	-	-	Sling	AM-2	-	-	-	Rainfall	AM-4	millimetres per hour	1 hour	Continuous	Temperature at 2 metres	AM-4	degrees Celsius	10 minutes	Continuous	Temperature at 10 metres	AM-4	degrees Celsius	10 minutes	Continuous	Wind Speed at 10 metres	AM-2 & AM-4	metres per second	10 minutes	Continuous	Wind Direction at 10 metres	AM-2 & AM-4	Degrees	10 minutes	Continuous	<ul style="list-style-type: none"> • The findings from this audit and the site inspection carried out on 05/12/2023. • Meteorological station data • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>Meteorological monitoring is documented in Section 28.1 of the OEMP.</p> <p>Supporting meteorological station records for the period 19/09/2023-26/09/2023 were verified.</p>	Compliant
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Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
M5	<i>Recording of pollution complaints</i>			
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.	<ul style="list-style-type: none"> OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. Complaints Register 	<p>Complaints Management is documented in Section 21 of the OEMP.</p> <p>The site maintains a register for all complaints received in relation to the activities undertaken on site i.e. noise, odour complaints etc.</p> <p>No complaints have been received.</p>	Compliant
M5.2	The record must include details of the following: <ol style="list-style-type: none"> the date and time of the complaint; the method by which the complaint was made; any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; the nature of the complaint; the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and if no action was taken by the licensee, the reasons why no action was taken. 	<ul style="list-style-type: none"> OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. Complaints Register 	<p>Complaints Management is documented in Section 21 of the OEMP.</p> <p>The site maintains a register for all complaints received in relation to the activities undertaken on site i.e. noise, odour complaints etc.</p> <p>No complaints have been received.</p>	Compliant
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	<ul style="list-style-type: none"> Complaints Register 	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.	<ul style="list-style-type: none"> Complaints Register 	No complaints have been received.	Compliant
M6	<i>Telephone complaints line</i>			
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.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. 	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

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
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.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. 	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.	<ul style="list-style-type: none"> None. 	None.	Compliant
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"> a Statement of Compliance, a Monitoring and Complaints Summary, a Statement of Compliance - Licence Conditions, a Statement of Compliance - Load based Fee, a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 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>	<ul style="list-style-type: none"> Evidence of submission of the last 3 Annual Returns. 	<p>All annual returns were submitted at the end of each reporting period, as follows:</p> <ul style="list-style-type: none"> 2021 Annual Return – 31/05/2021 2022 Annual Return – 30/05/2022 2023 Annual Return – 22/05/2023 	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>	<ul style="list-style-type: none"> Evidence of submission of the last 3 Annual Returns. 	All annual returns were submitted at the end of each reporting period,	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>	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • 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>	<ul style="list-style-type: none"> • Evidence of submission of the last 3 Annual Returns. 	<p>All annual returns were submitted no later than 60 days after the end of each reporting period, as follows:</p> <ul style="list-style-type: none"> • 2021 Annual Return – 31/05/2021 • 2022 Annual Return – 30/05/2022 • 2023 Annual Return – 22/05/2023 	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>	<ul style="list-style-type: none"> • OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. 	<p>Documentation and Records Management are documented in Section 13 of the OEMP.</p>	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. 	<ul style="list-style-type: none"> • Evidence of submission of the last 3 Annual Returns. 	All annual returns were signed by Kurt Whalan (Group Manager – Land, Environment & Hazardous Facilities) on behalf of JJ Richards and Sons Pty Ltd.	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>	<ul style="list-style-type: none"> • Incident Report prepared by JJ Richards dated 16/06/2023. • Advisory Letter from the NSW EPA dated 06/07/2023. 	<p>JJ Richard’s notified the NSW EPA on 1/06/2023 by telephoning the Environment Line service in relation to approximately 21,000 Litres of Oily Water (J120) mixed with treated Grease Trap Waste (TGTW) being injected into land described as Plot 2 of Paddock 3B, at 152 Medway Road Marulan Farm, NSW 2579</p> <p>Refer to Section 3.3 of the Audit report for information on the non-compliance</p>	Compliant
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	<ul style="list-style-type: none"> • Email from Kurt Whalan to the NSW EPA dated 01/06/2023. • Email from Kurt Whalan to the NSW EPA dated 10/08/2023. • Incident Report prepared by JJ Richards dated 16/06/2023 	<p>The Incident Report prepared by JJ Richards dated 16/06/2023 was not provided within 7 days of the date on which the incident occurred.</p> <p>(Refer to Section 3.3 of the Audit report for information on the non-compliance).</p>	Compliant
R3	Written report			

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: <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. 	<ul style="list-style-type: none"> • Advisory Letter from the NSW EPA dated 06/07/2023. 	<p>The NSW EPA requested additional information to assist with the investigation including:</p> <ul style="list-style-type: none"> • A copy of the waste disposal docket for the remainder of the contaminated TGTW that was taken to Enviro Waste Services Group Pty Ltd; • a report outlining what precautions will be implemented by JJ Richard’s to prevent the recurrence of an incident of a similar nature; and • a copy of the sampling plan as required under the Order, as well as the results of any sampling conducted in accordance with the order and/or sampling plan, for the period from 25 May 2023 to 8 June 2023 (inclusive). 	Compliant
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	<ul style="list-style-type: none"> • Email from Kurt Whalan to the NSW EPA dated 01/06/2023. • Advisory Letter from the NSW EPA dated 06/07/2023. • Email from Kurt Whalan to the NSW EPA dated 10/08/2023. 	<p>The NSW EPA requested that the additional information was to be provided by 11/08/2023.</p> <p>A response to the additional information was provided on 10/08/2023</p>	Compliant

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.	<ul style="list-style-type: none"> Advisory Letter from the NSW EPA dated 06/07/2023. 	The NSW EPA requested that the additional information was to be provided by 11/08/2023.	Compliant
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.	The findings from this audit.	No additional requests for further details was requested by the NSW EPA.	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.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. 	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.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. 	A copy of the licence is displayed on site.	Compliant

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	<ul style="list-style-type: none"> The findings from this audit and the site inspection carried out on 05/12/2023. 	A copy of the licence is displayed on site.	Compliant
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.	The findings from this audit	Consent condition is not within the scope of this Audit.	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.	The findings from this audit	Consent condition is not within the scope of this Audit.	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.	The findings from this audit	Consent condition is not within the scope of this Audit.	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.	The findings from this audit	Consent condition is not within the scope of this Audit.	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	The findings from this audit	Consent condition is not within the scope of this Audit.	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	The findings from this audit	Consent condition is not within the scope of this Audit.	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.	The findings from this audit	Consent condition is not within the scope of this Audit.	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.	<ul style="list-style-type: none"> OEMP Glendenning Liquid Waste Facility Version: 1.15 dated August 2023. The findings from this audit and the site inspection carried out on 05/12/2023. 	Spill management control measures are documented in Section 24.1 of the OEMP All liquid wastes and materials including chemicals, fuels and oils used on-site in appropriately bundled areas. The wastes within the organics building are stored and processed in sealed tanks. No spills were observed at the Site.	Compliant

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E3.2	<p>In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must:</p> <ol style="list-style-type: none"> make all efforts to contain all firewater on the licensee’s premises, make all efforts to control air pollution from the licensee’s premises, make all efforts to contain any discharge, spill or run-off from the licensee’s premises, make all efforts to prevent flood water entering the licensee’s premises, remediate and rehabilitate any exposed areas of soil and/or waste, lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of, at the request of the EPA monitor groundwater beneath the licensee’s premises and its potential to migrate from the licensee’s premises, at the request of the EPA monitor surface water leaving the licensee’s premises; and ensure the licensee’s premises is secure. 	<ul style="list-style-type: none"> The findings from this audit 	None	Not Triggered
E3.3	<p>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:</p> <ol style="list-style-type: none"> remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee’s premises; and rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination. 	<ul style="list-style-type: none"> The findings from this audit 	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	<ul style="list-style-type: none"> Post Commissioning Odour Audit was prepared by Air Noise Environment dated 27/09/2018. 	Post-commissioning odour testing was undertaken on 28 August 2018 in accordance with the requirements under the EPL.	Compliant
E4.2	<p>The Post Commissioning Odour Audit must include, but is not limited to:</p> <ol style="list-style-type: none"> 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. Compare results of post commissioning sampling with the emission estimation in the Air and Noise Assessment submitted as part of Development Application SSD6767. 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. An evaluation of the performance of odour mitigation and management measures implemented at the premises, including the activated carbon filters(s). 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. The nomination of a timeframe to implement any additional measures identified in part (e). 	<ul style="list-style-type: none"> Post Commissioning Odour Audit was prepared by Air Noise Environment dated 27/09/2018. 	Post-commissioning odour testing was undertaken on 28 August 2018 in accordance with the requirements under the EPL.	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>	<ul style="list-style-type: none"> The findings from this audit 	<p>Consent condition is not within the scope of this Audit.</p>	Not Triggered

Appendix B – Audit Team Approval

Our ref: SSD-6767-PA-10

Monique Bachtis
J.J. RICHARDS & SONS PTY LTD
MORETON PLAZA 3 GRANT STREET
CLEVELAND 4163

18/10/2023

Sent via the Major Projects Portal only

Subject: Glendenning Waste Treatment Facility – Independent Auditor Endorsement

Dear Mrs Bachtis

Reference is made to your post approval matter, SSD-6767-PA-10, request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Audit of the Glendenning Waste Treatment Facility, submitted as required by Schedule B, Part C, Condition C9 of SSD-6767 as modified (the consent) to NSW Department of Planning and Environment (**NSW Planning**) on 16 October 2023.

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

Consequently, as nominee of the Planning Secretary, I endorse the appointment of the following independent audit team from Jackson Environment and Planning Pty Ltd, and technical specialist from Northstar Air Quality Pty Ltd:

- Alan Parsons as lead auditor;
- Rylan Loemker as auditor;
- Mark Jackson as auditor; and
- Martin Doyle as technical specialist.

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

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

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

Notwithstanding the endorsement for the above independent audit team for this independent audit, each subsequent independent audit for the project requires a request for the re-endorsement of the existing audit team, or a request for agreement to a revised audit team be submitted to NSW Planning, for consideration of the Planning Secretary. Each request is reviewed and depending on the complexity of the project, the suitability of the proposed team will be considered.

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


Yours sincerely

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

Julia Pope
Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary

Appendix C – Independent Audit Declaration Form

Project Name	Glendenning Liquid Waste Facility 2023 Independent Environmental Audit
Consent Number	State Significant Development Consent 6767
Description of Project	Glendenning Liquid Waste Facility 2023
Project Address	14 Rayben Street, Glendenning NSW
Proponent	J.J. Richards & Sons Pty Ltd
Title of Audit	2023 Independent Environmental Audit – Glendenning Liquid Waste Facility
Date	7 March 2024
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> <i>i. the Audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);</i> <i>ii. the findings of the Audit are reported truthfully, accurately and completely;</i> <i>iii. I have exercised due diligence and professional judgement in conducting the Audit;</i> <i>iv. I have acted professionally, objectively and in an unbiased manner;</i> <i>v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Audit, or by relationship as spouse, partner, sibling, parent, or child;</i> <i>vi. I do not have any pecuniary interest in the Audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;</i> <i>vii. neither I nor my employer have provided consultancy services for the Audited project that were subject to this audit except as otherwise declared to the Department prior to the Audit; and</i> <i>viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> <p>Note.</p> <ul style="list-style-type: none"> <i>a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and</i> <i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)</i> 	
Name of Auditor	Alan Parsons
Signature	
Qualification	Lead Auditor
Company	Jackson Environment and Planning Pty Ltd
Company Address	1 Power Place, Jindabyne NSW 2627

Appendix D – Site Visit Photographs

Figure D1. Photograph of the administration building (left) and the Organic Waste Building (right)



Figure D2. Photograph of the used oil banded tank farm and loading/unloading bays.



Figure D3. Grease trap and food waste unloading bay within the Organic Waste Building.



Figure D4. Treated sludge and food waste loading bay within the Organic Waste Building.



Figure D5. Photograph of floor area of the grease trap and food waste tank farm.



Figure D6. Photograph of the grease trap and food waste tank farm.



Figure D7. Photograph of the used oil loading and unloading bays.



Figure D8. Photograph of the used oil banded tank farm.



Figure D9. Photograph of the rear of the Site.



Appendix E – Consultation Letters and Feedback



30th October 2023

Mr Kerry Robinson
Chief Executive Officer
Blacktown City Council
PO Box 60
Penrith NSW 2751

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

The audit team for this project was approved by the Department of Planning and Environment on 18th October 2023.

The objective of the Independent Environmental Audit is to assess the environmental performance of the Site since the last Independent Environmental Audit completed by Jackson Environment and Planning in April 2021. The Audit will cover the period between 12th January 2021 and 11th January 2024 (consistent with Condition C9, with the audit being commissioned now every three years).

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

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 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), Certified Environmental Practitioner CEnvP (1542), Impact Assessment Specialist (IA11071), NSW Registered Environmental Assessment Practitioner REAP (R80020)

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



30th October 2023

Ms Maria Divis
Senior Compliance Officer
Planning & Assessment
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

By email to: Maria.Divis@planning.nsw.gov.au

Dear Ms Divis,

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

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Jackson Environment and Planning Pty Ltd would like to present NSW Department of Planning and Environment 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), Certified Environmental Practitioner CEnvP (1542), Impact Assessment Specialist (IA11071), NSW Registered Environmental Assessment Practitioner REAP (R80020)

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



30th October 2023

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

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

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 and Environment.

Jackson Environment and Planning Pty Ltd would like to present 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), Certified Environmental Practitioner CEnvP (1542), Impact Assessment Specialist (IA11071), NSW Registered Environmental Assessment Practitioner REAP (R80020)

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



30th October 2023

Mr Rob Hogan
Director Regulatory Operations Metro West
NSW Environment Protection Authority
Locked Bag 5022
Parramatta NSW 2124

By email to: RegOps.MetroRegulation@epa.nsw.gov.au

Dear Mr Hogan,

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

The audit team for this project was approved by the Department of Planning and Environment on 18th October 2023.

The objective of the Independent Environmental Audit is to assess the environmental performance of the Site since the last Independent Environmental Audit completed by Jackson Environment and Planning in April 2021. The Audit will cover the period between 12th January 2021 and 11th January 2024 (consistent with Condition C9, with the audit being commissioned now every three years).

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


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 and Environment.

Jackson Environment and Planning Pty Ltd would like to present NSW EPA with the opportunity to comment on the environmental performance of the 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), Certified Environmental Practitioner CEnvP (1542), Impact Assessment Specialist (IA11071), NSW Registered Environmental Assessment Practitioner REAP (R80020)

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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



30th October 2023

Mr Moses Ogunsola
Consultant - Industrial Trade Wastewater
Sydney Water
PO Box 399
Parramatta NSW 2124

By email to: moses.ogunsola@sydneywater.com.au

Dear Mr Ogunsola,

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

The audit team for this project was approved by the Department of Planning and Environment on 18th October 2023.

The objective of the Independent Environmental Audit is to assess the environmental performance of the Site since the last Independent Environmental Audit completed by Jackson Environment and Planning in April 2021. The Audit will cover the period between 12th January 2021 and 11th January 2024 (consistent with Condition C9, with the audit being commissioned now every three years).

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


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 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), Certified Environmental Practitioner CEnvP (1542), Impact Assessment Specialist (IA11071), NSW Registered Environmental Assessment Practitioner REAP (R80020)

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



30th October 2023

Mr Mark Ozinga
Manager Land Use Planning & Development
Transport for NSW
231 Elizabeth Street
Sydney NSW 2000

By email to: Mark.Ozinga@transport.nsw.gov.au

Dear Mr Ozinga,

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

The audit team for this project was approved by the Department of Planning and Environment on 18th October 2023.

The objective of the Independent Environmental Audit is to assess the environmental performance of the Site since the last Independent Environmental Audit completed by Jackson Environment and Planning in April 2021. The Audit will cover the period between 12th January 2021 and 11th January 2024 (consistent with Condition C9, with the audit being commissioned now every three years).

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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 and Environment.

Jackson Environment and Planning Pty Ltd would like to present 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), Certified Environmental Practitioner CEnvP (1542), Impact Assessment Specialist (IA11071), NSW Registered Environmental Assessment Practitioner REAP (R80020)

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

RE: Agency consultation - Independent Environmental Audit - J.J.Richards & Sons Glendenning Liquid Waste Facility

Joshua Vogelzang <Joshua.Vogelzang@blacktown.nsw.gov.au>

Fri 24/11/2023 11:15 AM

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

Hi Ryan,

Thank you for your email and providing the letter from Dr Jackson.

After review of the facility and its operations we would like to provide the below comments for the performance of the facility.

We are committed to the preservation and protection of waterways. Ensuring the J.J. Richards Liquid Waste Facility at Glendenning is not impacting on the nearby drainage channels and waterways is our top priority.

We would like to confirm the facility is not impacting on the air quality of the local area. Ensuring that odour and aerosols are being contained within the facility.

I would like to confirm that we have no records of concerns or complaints being raised about the operations of the facility.

Should you wish to discuss this further, please feel free to contact me on 9839 6379.

Yours faithfully,



Joshua Vogelzang
Acting Coordinator Development and Contaminated Land

9839 6379

PO Box 63 Blacktown NSW 2148

blacktown.nsw.gov.au

**We acknowledge the Darug as the
First People of the Blacktown City region**

We support a First Nations Voice to Parliament

Visit [voice.gov.au]voice.gov.au for information about the Voice, and the upcoming referendum

Follow us on social media

From: rylan.jacksonenvironment.com.au <rylan@jacksonenvironment.com.au>

Sent: Monday, 30 October 2023 10:32 PM

To: Blacktown Council <Blacktown.Council@blacktown.nsw.gov.au>

Subject: Agency consultation - Independent Environmental Audit - J.J.Richards & Sons Glendenning Liquid Waste Facility

Good afternoon Mr Robinson,

Please find attached a letter regarding agency consultation for the Independent Environmental Audit of J.J. Richards & Sons Glendenning Liquid Waste Facility. The audit is required under Condition C9 of the Development Consent SSD 6767.

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. Jackson Environment and Planning Pty Ltd, as the appointed Auditor, would like to present the 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.

Regards,

Rylan Loemker BEnvSc (Hons), GradDipBusTech
Senior Consultant
Jackson Environment and Planning Pty Ltd
Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060
T: 02 8056 1849 or M: 0427 835 607
E: rylan@jacksonenvironment.com.au
W: www.jacksonenvironment.com.au



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RE: Agency consultation - Independent Environmental Audit - J.J.Richards & Sons Glendenning Liquid Waste Facility

Maria Divis <Maria.Divis@planning.nsw.gov.au>

Fri 3/11/2023 10:23 AM

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

Good morning Rylan

Thank you for consulting with the Department of Planning and Environment (the **department**) in order to obtain input into the scope of the Independent Environmental Audit (**IEA**), in accordance with SSD 6767, as modified (the **consent**) and the Independent Audit Post Approval Requirements 2020 (**IAPARs**).

The department would like for the IEA to provide an assessment of the environmental performance of the project in accordance with the requirements of the consent and the IAPARs, with a focus on air quality.

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

Kind regards,

Maria Divis

Senior Compliance Officer

Planning & Assessment | Department of Planning and Environment

T 02 8275 1156 | E Maria.Divis@planning.nsw.gov.au

Locked Bag 5022 | PARRAMATTA NSW 2124

www.dpie.nsw.gov.au



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

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

From: rylan.jacksonenvironment.com.au <rylan@jacksonenvironment.com.au>

Sent: Monday, 30 October 2023 10:34 PM

To: Maria Divis <Maria.Divis@planning.nsw.gov.au>

Subject: Agency consultation - Independent Environmental Audit - J.J.Richards & Sons Glendenning Liquid Waste Facility

Good afternoon Ms Divis,

Please find attached a letter regarding agency consultation for the Independent Environmental Audit of J.J. Richards & Sons Glendenning Liquid Waste Facility. The audit is required under Condition C9 of the Development Consent SSD 6767.

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. Jackson Environment and Planning

Pty Ltd, as the appointed Auditor, 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.

Regards,

Rylan Loemker BEnvSc (Hons), GradDipBusTech

Senior Consultant

Jackson Environment and Planning Pty Ltd

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

T: 02 8056 1849 or M: 0427 835 607

E: rylan@jacksonenvironment.com.au

W: www.jacksonenvironment.com.au



RE: HPE CM: Agency consultation - Independent Environmental Audit - J.J.Richards & Sons Glendenning Liquid Waste Facility

Janne Grose <Janne.Grose@environment.nsw.gov.au>

Thu 2/11/2023 12:35 PM

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

Hi Rylan

Thanks you for your email below. I checked our records in relation to this SSD-6767 and it appears the former OEH (now EHG) advised the Department relating to the SEARs request for this SSD that OEH did not have an interest in this matter.

Condition of Consent C9 indicates the Independent Environmental Audit is meant to:

(d) include a full odour audit of the development

(e) assess the env 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

The conditions relating to odour refer to approval from the EPA and Condition B24 indicates the development shall comply with section 120 of the POEO Act which prohibits the pollution of waters except as expressly provided in an EPL - it would appear you should be contacting the EPA rather than EHG

EHG requests it is removed from the contact list for the Independent Environmental Audit for this SSD

Thanks Rylan

Kind regards from

Janne

2/11/23

Janne Grose

Senior Conservation Planning Officer

Greater Sydney

Biodiversity & Conservation | Environment and Heritage

Department of Planning and Environment

T 02 8837 6017 | E janne.grose@environment.nsw.gov.au

Level 6, 12 Darcy Street, 4 Parramatta Square, Parramatta NSW 2150 | Locked Bag 5022

www.dpie.nsw.gov.au

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

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

Sent: Monday, 30 October 2023 10:36 PM

To: Janne Grose <Janne.Grose@environment.nsw.gov.au>

Subject: HPE CM: Agency consultation - Independent Environmental Audit - J.J.Richards & Sons Glendenning Liquid Waste Facility

Good afternoon Ms Grose,

Please find attached a letter regarding agency consultation for the Independent Environmental Audit of J.J. Richards & Sons Glendenning Liquid Waste Facility. The audit is required under Condition C9 of the Development Consent SSD 6767.

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. Jackson Environment and Planning Pty Ltd, as the appointed Auditor, 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.

Regards,

Rylan Loemker BEnvSc (Hons), GradDipBusTech
Senior Consultant
Jackson Environment and Planning Pty Ltd
Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060
T: 02 8056 1849 or M: 0427 835 607
E: rylan@jacksonenvironment.com.au
W: www.jacksonenvironment.com.au



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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

Scope of Audit - JJ Richards Glendenning

Rhys Inez <rhys.inez@epa.nsw.gov.au>

Mon 4/12/2023 2:56 PM

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

Good morning Rylan.

With regard to the scope for the Independent Environmental Audit of J.J. Richards & Sons Glendenning Liquid Waste Facility, The EPA issued the licensee with an advisory letter regarding an incident where on 25 May 2023 JJ's collected car wash waste water instead of grease trap waste and on 1 June 2023 applied that car wash waste water to land at Marulan (collectively, the Incident).

The EPA understands that JJ's became aware of the Incident on 1 June 2023, and JJ's have taken actions as a response to the incorrect application of this waste to land. JJ's have advised the EPA that the Incident occurred due to a JJ's employee misinterpreting the instructions about which waste liquid pit the liquid waste was to be collected. The EPA understands that as a result of the incident, approximately 21,000 Litres of Oily Water (J120) mixed with treated Grease Trap Waste (TGTW) was injected into land described as Plot 2 of Paddock 3B, at 152 Medway Road Marulan Farm, NSW 2579 at coordinates -34.716, 150.022 (the application Site).

This land is owned by JJ's and is used for the application of TGTW to land in accordance with The JJ Richards Glendenning and Hume treated grease trap waste exemption 2022, for TGTW that has been treated at the Glendenning Premises in accordance with The JJ Richards Glendenning and Hume treated grease trap waste order 2022. The EPA understand that on 6 June 2023, JJ's arranged for samples to be collected from the residual contaminated TGTW in the B-Double truck which transported the contaminated TGTW from the Premises to the application Site, as well as from soils from the application site.

Is this issue part of the scope of your audit?

Sincerely,

Rhys Inez

Operations Officer

Regulatory Operations Metro West

NSW Environment Protection Authority

D 02 9995 6359

M 0428 209 138



I work on Burramattagal Country of the Dharug Nation.

NSW is banning certain single-use plastics from 1 November

- From 1 November**
Plastic straws, stirrers, cutlery
- From 1 November**
Plastic plates and bowls
- From 1 November**
Expanded polystyrene foodware
- From 1 November**
Cotton buds, microbeads in rinse-off products

The banner features a dark background with white text and icons. On the right side, there is a small version of the NSW EPA logo.

www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the Traditional Custodians of the land, waters and sky where we work.

As part of the world's oldest surviving cultures we pay our respect to Aboriginal Elders past, present and emerging.

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20231110 - TfNSW response : Agency consultation - Independent Environmental Audit - J.J.Richards & Sons Glendenning Liquid Waste Facility

Felix Liu (TRAFFIC PARKING) <Felix.Liu@transport.nsw.gov.au>

Fri 10/11/2023 1:23 PM

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

Hi Rylan

Reference is made to your email and letter in relation to the subject matter.

Transport for NSW has no comment on this matter.

Regards

Felix Liu

Land Use Planner
Planning & Programs
Greater Sydney
Transport for NSW

E felix.liu@transport.nsw.gov.au
transport.nsw.gov.au

Level 4, 4 Parramatta Square,
12 Darcy Street, Parramatta NSW 2150

OFFICIAL

OFFICIAL

From: rylan.jacksonenvironment.com.au <rylan@jacksonenvironment.com.au>

Sent: Monday, 30 October 2023 10:41 PM

To: Mark Ozinga <Mark.Ozinga@transport.nsw.gov.au>

Subject: Agency consultation - Independent Environmental Audit - J.J.Richards & Sons Glendenning Liquid Waste Facility

You don't often get email from rylan@jacksonenvironment.com.au. [Learn why this is important](#)

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Good afternoon Mr Ozinga,

Please find attached a letter regarding agency consultation for the Independent Environmental Audit of J.J. Richards & Sons Glendenning Liquid Waste Facility. The audit is required under Condition C9 of the Development Consent SSD 6767.

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. Jackson Environment and Planning Pty Ltd, as the appointed Auditor, would like to present TfNSW 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.

Regards,

Rylan Loemker BEnvSc (Hons), GradDipBusTech
Senior Consultant
Jackson Environment and Planning Pty Ltd
Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060
T: 02 8056 1849 or M: 0427 835 607
E: rylan@jacksonenvironment.com.au
W: www.jacksonenvironment.com.au



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Appendix F – 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: Monday 4 December 2023
Time: 10:30am – 2:30pm

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, located at 14 Rayben St, Glendenning (the Site). 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 April 2021. This Audit will cover the period between 12th January 2021 and 11th January 2024.

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

The audit team for this project was approved by the Department of Planning and Environment on 18th October 2023.

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.

Ms Monique Bachtis	Operations Supervisor – Liquid	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	Lead Auditor	Jackson Environment and Planning Pty Ltd

Audit plan

The audit process outlined in *ISO 19011 Guidelines for Auditing Management Systems (2018)* has been used to inform the development of the audit plan. The audit plan including the audit methodology is summarised in Table 1.

Audit activities to be performed on site on Monday 4 December 2023 are noted.

Audit Scope and Objectives

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

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

Project implementation phase

In relation to the 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 with the conditions of Development Consent SSD 6767 for the period between 12th January 2021 and 11th January 2024. Records reviewed will fall within 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 will be conducted in accordance with the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements (2020)*.

The Audit will also include 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> (2020), a letter was prepared seeking DPE approval for the audit team.
Completed (this document)	Develop the Audit Plan – An audit plan will 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 want 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, Blacktown City Council, Transport for NSW, Sydney Water, NSW Department of Primary Industries and the NSW Department of Planning and Environment in accordance with your consent and the <i>Independent Audit Post Approval Requirements</i> .
Scheduled for Monday 4 December 2023	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, Blacktown City Council, Transport for NSW, Sydney Water, NSW Department of Primary Industries and the NSW Department of Planning and Environment 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.
Approx. 2 weeks after site audit (Monday 18 December 2023)	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.
	Formalise audit findings in a report – The final findings will be formally written and distributed in an audit report. The report will be provided within two (2) weeks of the on-site audit.

An agenda for delivery of the on-site audit on Monday 4 December 2023 is given in Table 2.

Table 2. Agenda for the on-site audit scheduled for Monday 4 December 2023.

Agenda item	Item description
1.	1030 - 1045: Introductions (all) and confirm scope of the audit (Mark)
2.	1045 - 1215: 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 • Environmental 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
3.	1215 - 1220: Site inductions and familiarisation walk through (all)
4.	1220 - 1345: 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)
5.	1345 - 1415: Review of audit findings and additional evidence required to complete audit.
6.	1415 - 1430: Questions and close