

## JJ RICHARDS AND SONS PTY LTD

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### **INDEPENDENT ENVIRONMENTAL AUDIT JUNE 2018**



### **GLENDENNING LIQUID WASTE TREATMENT FACILITY**

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**DEVELOPMENT CONSENT NO. SSD 6767**

Prepared for  
JJ Richards and Sons Pty Ltd

by  
Mark Rigby & Associates Pty Ltd

**June 2018**

## DOCUMENT CONTROL SHEET

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## **LIMITATIONS**

Mark Rigby & Associates Pty Ltd has prepared this Environmental Audit Report for JJ Richards and Sons Pty Ltd in relation to their operations at Glendenning Liquid Waste Treatment Facility, located on 14 Rayben Street, Glendenning, NSW.

We have performed our services for this project in accordance with our current professional standards. No other warranty, expressed or implied is made as to the professional advice included in this submission.

Opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal opinions. The report may also contain comments and information provided by others. Mark Rigby & Associates cannot take responsibility for advice provided by any third party.

This document has been prepared for the sole purpose of JJ Richards and Sons Pty Ltd as a Third Party Independent Environmental Audit as at May 2018 as required by the NSW Department of Planning and Environment Development Consent SSD6767 and may not contain sufficient information for the purposes of other parties, for other uses, other years or at other locations.

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## ATTACHMENTS

- ATTACHMENT A -** Mark Rigby & Associates Pty Ltd Company Capability Statement  
**ATTACHMENT B -** Mark Rigby & Associates Audit Report Certification  
**ATTACHMENT C -** Consultation Correspondence  
**ATTACHMENT D -** Photos from site audit

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## 1.0 INTRODUCTION

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On 11<sup>th</sup> January 2017, JJ Richards and Sons Pty Ltd (JJ Richards) was granted Development Consent (SSD 6767) for the Glendenning Liquid Waste Facility, comprising the construction and operation of a liquid waste treatment facility with the capacity to process up to 52,000 tonnes of liquid waste per annum.

The Glendenning Liquid Waste Facility is located at 14 Rayben Street Glendenning NSW on Lot 123 DP 870988 (formerly Lots 1-3 DP802117) and has an area of 7,214 m<sup>2</sup>. The site is located within an industrial area, with the nearest residential premises located approximately 420m to the north. JJ Richards also own and operate a maintenance workshop, truck holding yard and ancillary offices opposite the Glendenning Liquid Waste Facility at 7-11 Rayben Street.

The site is approved for the management of a range of liquid wastes including grease trap waste, food waste, used oil and industrial oily water; however at the time of the audit only the grease trap waste and food waste operations had been commissioned in accordance with the NSW EPA Licence No. 21053 issued on 4th April 2018. Subsequently, the scope of the Independent Environmental Audit extends only to the grease trap waste and food waste operations.

A general description of all proposed operations at the Glendenning Liquid Waste Facility is provided as follows:

- Storage and treatment of 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'). This treatment generally involves separating liquids from solids and discharging treated liquids as trade waste to Sydney Water's sewer system. 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 Treated Grease Trap Waste Resource Recovery Exemption 2014 under Part 9, Clauses 91 and 92 of the *Protection of the Environment Operations (Waste) Regulation 2014* ('the Regulation').
- Storage of 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 Exemption 2014 Resource Recovery Exemption under Part 9, Clauses 91 and 92 of the Regulation.
- Storage of used oil for resource recovery, aggregation and transport to re-refining and other appropriately licensed facilities for treatment;
- Storage and treatment of industrial oily water (J120 type waste - waste oil/hydrocarbons mixtures/emulsions in water). This treatment generally involves separating used oils, hydrocarbons and solids and discharging treated liquids as trade waste to Sydney Water's sewer system. The resultant used oil is stored for resource recovery, aggregation and transport to re-refining and other appropriately licensed facilities for treatment.

Liquid waste received at the site is collected in tankers from premises throughout the Sydney region and transported to the proposed facility for storage, resource recovery, aggregation and possibly treatment.

Loading and unloading areas have external bunding and in-ground sumps for adequate spill control. Equipment for unloading, treatment, storing and loading of liquid grease trap and food waste is located within the bunded Organic Waste Building. Equipment for unloading, treatment, storing and loading of used oil and J120 industrial oily water, is located within the Used Oil Roof Structure.

The following report presents an Independent Environmental Audit (IEA) which assesses the level of environmental performance of JJ Richards' current activities against the conditions within NSW DP&E Development Consent No. SSD 6767 and NSW EPA Licence Notice No: 21053.

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## 2.0 METHODOLOGY

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### 2.1 AUDIT OBJECTIVES

The main objective of the Independent Environmental Audit (IEA) was to assess the level of compliance of JJ Richards' operations at the Glendenning Liquid Waste Treatment Facility against the conditions within both the NSW DP&E Development Consent No. SSD 6767 and NSW EPA Licence Notice No: 21053.

During the audit process however, as matters arose in regard to general environmental performance and legislative compliance, these were discussed with management and included in the report with relevant comments/recommendations.

### 2.2 AUDIT SCOPE

The physical boundaries of the IEA were limited to JJ Richards' operations at 14 Rayben Street, Glendenning (Lot 123 DP 870988). Information and documentation considered within the IEA is from the date of issue of Development Consent No. SSD 6767 being the 11<sup>th</sup> January 2017 up until to 14<sup>th</sup> June 2018.

Please note that the Glendenning Liquid Waste Facility was not fully commissioned at the time of the IEA and the operational status of processes on the site at the time of the audit was as follows:

- Storage and treatment of grease trap waste that is liquid waste (recently commissioned);
- Storage of food waste that is liquid waste for aggregation and transport for beneficial reuse in the cultivation of feed crops (recently commissioned);
- Storage of used oil for resource recovery, aggregation and transport to re-refining and other appropriately licensed facilities for treatment (not commissioned as yet); and
- Storage and treatment of industrial oily water (not commissioned as yet).

On this basis, only the recently commissioned activities and processes associated with the storage and treatment of grease trap waste and storage of food waste were assessed within the scope of this IEA.

### 2.3 AUDIT CRITERIA

Condition C9 of Development Consent No. SSD 6767 requires JJ Richards to undertake an IEA to assess compliance with the conditions of the Development Consent within one (1) year of the date of the consent, and every three (3) years thereafter unless directed or agreed to otherwise by the Secretary.

Condition C9 of Development Consent No. SSD 6767 forms the basis of the audit criteria, and outlines that the IEA must:

- a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved 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 the 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/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/program required under the consents.

It is noted that Condition C9 subsection d) requires a full odour audit of the Development as part of the IEA process. However, Development Consent Condition B14 also requires an Odour Audit within 6 months of commencement of the operation on 4<sup>th</sup> April 2018. JJ Richards advised that they are in discussion with the Department and are in the process of engaging Air Noise Environment to undertake a Post Commissioning Odour Audit. The scope of works for the proposed Odour Audit includes reference to Condition B14 and also Condition E4.2 of the EPA Licence No. 21053. Taking this into account, a full odour audit was not undertaken as part of this IEA.

## 2.4 AUDIT TEAM

As required by Condition 9 of Development Consent No. SSD 6767, the IEA is to be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Secretary. Please refer to **Attachment A** which includes Secretary approval for Mark Rigby and Allison Reiser of Mark Rigby & Associates Pty Ltd (MRA Environmental) to undertake the audit.

A company Capability Statement has also been included in **Attachment A** and contains details of relevant works completed over the past twenty (20) years. MRA are also the proud recipients of the Gold Coast Business Excellence – Environment and Sustainability Award for Oct 2014 and Oct 2016. Mark and Allison conducted the site audit together for this project.



A summary of each project member is provided below.

Mark Rigby – Project Manager

Mark is director of MRA and has thirty-six (36) years of experience in the environmental management profession. He has extensive experience in environmental auditing (Registered Auditor 15303), environmental management and reporting across a variety of projects including resource extraction, manufacturing, Government sector and waste management.

Allison Reiser– Senior Environmental Consultant & Lead Auditor

Allison has over twenty (20) years of experience in the environmental management profession. She has past employment experience with Local Government, State Government (EPA) and the private sector. She is an Exemplar Global registered lead environmental auditor (Certificate No. 119876) and has extensive experience in environmental management system and ERA auditing.

## 2.4 ENVIRONMENTAL AUDIT PROCESS

The audit was undertaken at the Glendenning Liquid Waste Facility at 14 Rayben Street, Glendenning over a one (1) day period on 9th May 2018.

The audit involved a systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the operations comply with the conditions of Development Consent No. SSD 6767 and NSW EPA Licence Notice No: 21053.

The audit was undertaken in the presence of and with the assistance of JJ Richards' Management including:

- Kurt Whalan (National Manager – Environment & Regulatory Affairs);
- Amiee Hanna (Lawyer);
- Mick Nicholson (NSW/ACT General Manager); and
- Ben Martis (NSW Liquid Manager).

The audit was completed by undertaking the following key tasks:

***Task 1 – Desk-top Assessment of Documents*** including:

- Review of conditions within Development Consent No. SSD 6767 dated 11 January 2017;
- Review of development layout plans and drawings, management and mitigation measures referenced in the Development Consent;
- Review of Environmental Impact Statement documentation;
- Review of the Response to Submissions;
- Review of conditions within the NSW EPA Licence Notice No:21053;
- Review of available environmental monitoring data;
- Confirmation of scope and objectives of audit with client; and
- Preparation of pre-audit questionnaire and development of audit checklist.

**Task 2 – Site visit** including:

- Pre-audit meeting to confirm audit scope / objectives / schedule / audit participants;
- Review and analysis of relevant development and operations documentation and data;
- An inspection of site activities to verify compliance (or otherwise);
- Discussion with relevant site personnel;
- Assessment of compliance with each Development Consent No. SSD 6767 & NSW EPA Licence Notice No:21053 condition; and
- Post-audit meeting to review audit findings and discuss any corrective action recommendations.

**Task 3 – Preparation of Independent Environmental Audit report** including:

- Introduction;
- Audit Methodology including Objectives, Scope and Criteria;
- Audit Findings, Compliance Status for each condition, Risk Level and Recommendations; and
- Independent Audit Report Certification.

## 2.5 AUDIT REPORT FORMAT

An Audit Checklist was prepared based on all conditions within the above-referenced approvals. This checklist re-states each Development Consent/EPA Licence condition and includes columns for findings/comments, compliance status, risk level and recommendations (where appropriate) relating to each condition. Where applicable, a reference to the witnessed document has also been provided.

Based on this checklist, the Audit Findings are tabulated in the below format and are provided in full in **Section 4.0 Environmental Audit Findings**.

The Audit Findings have been presented in the following format:

CONDITION	Comment	Compliance Status	Observation of Recommendation
Re-statement of the condition	Summary of the general comment/ non-compliance/ opportunity for improvement identified on-site.	If non-compliant, the cell will be colour code to reflect the level of risk as per Section 2.5 criteria.	Recommendation to achieve compliance  Observation for continuous improvement consideration

The following compliance assessment criteria were applied to each Development Consent/ EPA Licence condition:

Assessment	Criteria
<b>Compliant</b>	Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit.
<b>Not verified</b>	Where the auditor has not been able to collect sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of sufficient verification the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. However, the auditor could note in the report that they have no reasons to believe that the operation is non-compliant with that requirement.
<b>Non-compliant</b>	Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent of one or more specific elements of the regulatory approval have not been complied with within the scope of the audit.
<b>Administrative non-compliance</b>	A technical non-compliance with a regulatory approval that would not impact on performance and that is considered minor in nature (e.g. report submitted but not on the due date, failed monitor or late monitoring session). This would not apply to performance-related aspects (e.g. noise management plan not prepared and submitted for approval).
<b>Not triggered</b>	A regulatory approval requirement has an activation or timing trigger that had not been met at the time of the audit inspection, therefore a determination of compliance could not be made.
<b>Observation</b>	Observations are recorded where the audit identified issues of concern which do not strictly relate to the scope of the audit or assessment of compliance. Further observations are considered to be indicators of potential non-compliances or areas where performance may be improved.
<b>Note</b>	A statement or fact, where no assessment of compliance is required.

The terms “partial compliance” or “partial non-compliance” or similar are not used.

Where conditions are assessed as Non-Compliant/Administrative Non-Compliance or there is a pertinent General Comment or Observation identified, these have been summarised in separate tables included in **Section 3.3 and Section 3.8** of this report for easy reference.

The following risk levels were applied to any non-compliance with a Development Consent/ EPA Licence condition:

Risk level	Colour code	Description
<b>High</b>		Non-compliance with potential for significant environmental consequence, regardless of the likelihood of occurrence.
<b>Medium</b>		Non-compliance with: <ul style="list-style-type: none"> <li>• Potential for serious environmental consequences, but is unlikely to occur; or</li> <li>• Potential for moderate environmental consequences, but is likely to occur</li> </ul>
<b>Low</b>		Non-compliance with: <ul style="list-style-type: none"> <li>• Potential for moderate environmental consequences, but is unlikely to occur; or</li> <li>• Potential for low environmental consequences, but is likely to occur</li> </ul>
<b>Administrative non-compliance</b>		Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions)

## 2.6 AUDIT REPORT CERTIFICATION

Mark Rigby & Associates Pty Ltd have certified the findings in this audit report by the provision of an Independent Audit Certification Form in **Attachment B**.

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## 3.0 SUMMARY OF AUDIT FINDINGS & RECOMMENDATIONS

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### 3.1 Agency and Community Consultation

Consultation with relevant agencies involved with the Development was initiated by email correspondence sent on 27<sup>th</sup> April 2018. Agencies were advised that an Independent Environmental Audit was underway and were invited to provide feedback and draw the auditor's attention to any key issues within the scope of the audit. A copy of this correspondence and the responses received is provided in **Attachment C**.

Agencies contacted during the consultation process included:

- Dept of Planning & Environment (EIS lodgement contact officer)
- Dept of Planning & Environment (Assessing Officer)
- NSW Environmental Protection Agency (contact officer as per current EPA Licence)
- Department of Primary Industries (Client Services Co-ordinator and Water Regulation Officer)
- Blacktown City Council (Development Services and Administration)
- Department of Transport Roads & Maritime Services (Officers involved in original SEARS and EIS)
- Sydney Water (Officers involved in original SEARS and Stakeholder Consultation)

The following two (2) responses were received during the consultation process:

1. Received 30<sup>th</sup> April 2018 from Sydney Water advising a conditional consent has been granted to discharge industrial trade wastewater to Sydney Waters' sewerage system; and
2. Received 17<sup>th</sup> May 2018 from Blacktown City Council advising that the IEA should assess compliance with the EPL, and conditions relating to: Operation of Plant and Equipment, Odour, Odour Management Plan, Noise Mitigation, Noise Compliance Measurement, and Bunding.

The "Consent to discharge industrial trade wastewater" documentation was observed during the audit and compliance with all conditions within the EPL was undertaken as part of the IEA.

There is no Community Consultative Committee required by the Development Consent, therefore no community consultation is required as part of the IEA.

### 3.2 Actions required from previous audit

This is the first IEA since the date of the Development Consent, therefore there are no actions from previous reviews.

### 3.3 Summary of Compliance Assessment

The Audit Checklist incorporating each condition, assessing compliance status, documenting evidence, providing risk level and recommendations for any non-compliance is provided in full in **Section 4.0 Environmental Audit Findings**.

The Glendenning Liquid Waste Facility is a modern, well-designed facility supported by a comprehensive integrated management system incorporating ISO14001 (EMS), ISO 9001(QMS) and AS/NZ 4801(Safety) components. The storage and treatment of grease trap waste and food waste was recently commissioned on 4 April 2018. Storage and treatment of used oil and industrial oily water had not yet been commissioned at the time of the audit. As such, in some instances, conditions had not been triggered due to not reaching nominated timeframes or relevant events simply had not occurred to date.

The facility achieved compliance with all triggered EPA Environmental Protection Licence conditions and the majority of triggered Development Consent conditions at the time of the IEA. No Low, Medium or High Risk Non-compliances were identified.

However, three (3) Administrative non-compliances against Development Consent conditions were identified in relation to regular reporting, the IEA and the Annual Review process. It is acknowledged that JJ Richards does not agree with the findings in relation to condition C8, and therefore clarification with the Department on interpretation of this condition may be beneficial for future reference. It is noted that the site was not operational within one (1) year of development consent (11 Jan 2017) which contributed to these Administrative non-compliance. As such, the Annual Environmental Management Review and Independent Environmental Audit were not conducted. The Secretary was made aware of the non-compliance by JJ Richards as confirmed in correspondence dated 22 February 2018.

The Administrative non-compliances and associated Recommendations are outlined below:

Condition	Comment	Compliance Status	Observation or Recommendation
<b>Regular Reporting</b>  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.	<p>The Operational Environmental Management Plan (OEMP) Version 1.3 dated November 2017 is an approved plan currently in place and Section 28 outlines Monitoring and Review processes. Section 28.5 indicates that details of the Annual Review of Environmental Performance will be made available to the public via JJR's website.</p> <p>The annual review of environmental performance was undertaken in February 2018 and documented in the 2018 Annual Environmental Management Report. However, no details of this annual review were found on the JJ Richards website as required by section 28.5 of the OEMP.</p>	<b>Administrative non-compliance</b>	<b>Recommendation 1</b>  It is recommended JJ Richards make details of the 2018 Annual Environmental Management Report public via JJ Richards website and/or consider review of Section 28.5 and/or consider the need for inclusion of this requirement.
<b>Independent Environmental Audit</b>  C9. 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;	<p>Following Development Consent approval on 11 January 2017, the facility was constructed between April 2017 and April 2018. The storage and treatment of grease trap waste and food waste was recently commissioned on 4 April 2018. This commencement date coincides with the issue of the EPA Licence 21053 on 4 April 2018.</p> <p>The site was not operational within 1 year of the consent, as such the Independent Environmental Audit (IEA) was not undertaken. Correspondence dated 22 February 2018 from the Secretary in relation to non-compliance with Conditions C9 was observed. It is noted the Department requested progress be made to undertake the IEA and that no further compliance action would be taken in this instance.</p> <p>The audit undertaken by Mark Rigby &amp; Associates (MRA) on 9th May 2018 represents the first IEA conducted on the Development, however it was not</p>	<b>Administrative non-compliance</b>	<b>Recommendation 2</b>  <i>It is recommended JJ Richards ensure that future IEA's are undertaken in timeframes nominated in Condition C9 and suggest the Annual Planner for the site be updated to include the IEA as task at 3 year intervals.</i>



Condition	Comment	Compliance Status	Observation or Recommendation
<p>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;</p> <p>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);</p> <p>f) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and</p> <p>g) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.</p>	<p>conducted within 1 year from the date of consent.</p> <p>Requirements of this condition are addressed as follows:</p> <p>a) MRA were approved by the Secretary as suitably qualified, experienced and independent persons on 19th February 2018;</p> <p>b) The MRA audit team consists of Exemplar certified Principal and Lead auditors with expertise in waste management industries;</p> <p>c) Nominated contacts within relevant agencies were consulted via an email sent on 27/04/2018 prior to the site inspection undertaken on 9/05/2018;</p> <p>d) A full odour audit was not undertaken as part of the IEA. This is being commissioned separately as outlined in Condition B14;</p> <p>e) The MRA IEA was conducted against conditions within Development Consent SSD 6767 and EPA Licence No. 21053;</p> <p>f) As per e);</p> <p>g) As per e). Recommendations have been provided throughout the IEA report as considered appropriate by MRA.</p>		
<p><b>Annual Review</b></p> <p>C11. 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> <p>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;</p> <p>b) include a report on the previous calendar year's water treatment and non-potable water use;</p>	<p>Following Development Consent approval on 11 January 2017, the facility was constructed between April 2017 and April 2018. The storage and treatment of grease trap waste and food waste was recently commissioned on 4 April 2018. This commencement date coincides with the issue of the EPA Licence 21053 on 4 April 2018.</p> <p>The site was not operational within 1 year of the Development Consent, as such the Annual Review was not undertaken. Correspondence dated 22 February 2018 from the Secretary in relation to non-compliance with Conditions C11 was observed. It is also noted that the Department acknowledged receipt of the Annual Environmental Management</p>	<b>Administrative non-compliance</b>	<p><b>Recommendation 3</b></p> <p><i>It is recommended JJ Richards ensure that future Annual Reviews are undertaken in timeframes nominated in Condition C11 and suggest the Annual Planner for the site be updated to include the Annual Review as task at 1 year intervals.</i></p>



Condition	Comment	Compliance Status	Observation or Recommendation
<p>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:</p> <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements, limits or performance measures/criteria;</li> <li>(ii) requirements of any plan or program required under this consent;</li> <li>(iii) the monitoring results of previous years; and</li> <li>(iv) the relevant predictions in the EIS;</li> </ul> <p>d) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>e) identify any trends in the monitoring data over the life of the Development;</p> <p>f) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and</p> <p>g) describe what measures will be implemented over the next year to improve the environmental performance of the Development.</p>	<p>Report on 16 February 2018.</p> <p>The 2018 Annual Environmental Management Report was undertaken by Duggan &amp; Hede and represents the first Annual Review, however it was not conducted within 1 year from the date of consent.</p> <p>The 2018 Annual Environmental Management Report was reviewed and addressed the requirements of items a) to g) taking into account that the facility was not operational in February 2018.</p>		

### 3.4 Management Plan Compliance

A number of Management Plans are required as a result of conditions within the Development Consent SSD 6767 and EPA Licence Notice No: 21053. This includes:

- Odour Management Plan;
- Construction Environmental Management Plan;
- Operational Environmental Management Plan;
- Pollution Incident Response Management Plan.

The Development was observed to be operating generally in accordance with the approved Odour Management Plan, however it is understood that odour sampling has not commenced as yet.

The facility was constructed between April 2017 and April 2018. The Final Occupation Certificate 170052 was issued by Greenfield Certifiers on 9th May 2018. The Development project managers Duggan & Hede Pty Ltd have provided written confirmation that they supervised construction of the facility and construction practices were in accordance with the site's Construction Environmental Management Plan.

An approved Operational Environmental Management Plan (OEMP) is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility. Based on documentation observed and observations during the site inspection, the Development is being carried out generally in accordance with the approved OEMP. It is also noted that continuous improvement processes are in place and a Table of Amendments – OEMP document was observed outlining proposed amendments for Secretary Approval. The recent commissioning of the Organics Building at the facility has resulted in some refinement of processes/forms within the approved OEMP. Suggested improvements to elements of the OEMP have also been made as a result of the IEA and are summarised in **Section 3.8**.

The EPA Licence conditions requires a Pollution Incident Response Management Plan (PRIMP) be developed within three (3) months from the issue of the EPA Licence. The IEA was undertaken within this three (3) month timeframe and as such the PRIMP was being prepared. JJ Richards advised the PRIMP will be submitted within the required timeframe. The Draft PRIMP Version 2 January 2018 addressing Glendenning Liquid Waste Facility, Seven Hills Liquid Treatment Facility & St Mary Recycling Facility was observed.

### **3.5 Commitments and Key Project Features**

Key attributes of the Development referred to in environmental assessment documentation include:

- All receipt, treatment and load out operations will be undertaken within buildings;
- Loading areas will have external bunding and in-ground sumps for adequate spill control;
- All storage tanks and treatment equipment will be within bunded tank farms;
- There are significant buffer distances from the proposed development to residences; and
- There is a low impact on the physical environment (land, soil and water) as demonstrated in this EIS and in the operation of similar Liquid Waste Facilities.

The Development was observed to have incorporated the above key attributes into the design and operation of the facility. The location of the development is within an industrial area, with the facility positioned on concrete hardstand which covers the majority of the site (excluding perimeter landscaping). Waste receipt, treatment and loading areas are within buildings/roofed structures. Loading areas were observed to have bunding and in-ground sumps for spill control.

Wastewater is discharged to the sewer system under Sydney Water consent. Rainwater is collected from roofed areas for reuse and stormwater is treated in stormwater quality improvement device prior to release from the site. The resultant sludge from grease trap waste and aggregated liquid food waste is transported for beneficial reuse in the cultivation of feed crops on farms in the Sydney region.

Odour was an issue of potential concern discussed during the Response to Submissions process raised by residents and the EPA. The nearest residents are approximately 420m to the north and there is a 900m buffer to residents to the east and west of the site. JJ Richards worked with the EPA to address these concerns, which resulted in modified conditions ensuring all food waste is stored in sealed tanks vented to the activated carbon filter and the Dissolved Air Flotation (DAF) Unit is contained in a sealed room vented to the activated carbon filter. Wastes are transferred via positive displacement pumps at all stages (which don't need venting) and discharges from the fully enclosed DAF unit were observed to be treated by an activated carbon filter odour control system. No offensive odour was experienced during the audit.

### **3.6 Incidents and Complaints**

There have been no complaints received or incidents reported to date.

### **3.7 Environmental Performance**

The IEA found broad compliance being achieved with Development Consent and EPA Licence conditions. An approved Operational Environmental Management Plan (OEMP) is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility.

The facility has only recently commissioned the storage and treatment of grease trap waste and food waste component of operations, therefore the next IEA will have greater capacity to assess overall environmental performance once the site is fully commissioned and has operated for three (3) years. JJ Richards have a comprehensive Integrated Management System in place, and it is anticipated refinement of processes and mitigation measures will occur as operational levels increase.

There has been no quantitative noise or air quality monitoring undertaken to date, however a Post Commissioning Odour Audit is in the process of being arranged.

### 3.8 Continual Improvement Opportunities

As noted previously, the Audit Checklist incorporating each condition, assessing compliance status, documenting evidence, providing risk level and recommendations for any non-compliance is provided in full in **Section 4.0 Environmental Audit Findings**.

Fifteen (15) Observations were made for consideration as continuous improvement opportunities. These are outlined below:

Condition	Comment	Compliance Status	Observation or Recommendation
<p><b>WASTE LIMITS</b></p> <p>A6. The Applicant shall not receive or process on Site more than 52,000 tonnes of liquid waste per calendar year comprising:</p> <ul style="list-style-type: none"> <li>a) 42,000 tonnes of liquid organic waste (K110 and K120 wastes); and</li> <li>b) 10,000 tonnes of used oil/industrial oily water (J110 and J120 wastes).</li> </ul>	<p>A Waste Inventory Spreadsheet (WIS) system is in place at the moment to record the amount of waste received. This will be automated with the weighbridge system within the month. Standard conversion rate used is 1T:1KL. The WIS was observed and showed that between 04/04/2018 and 08/05/2018 a total of 474,600 litres had been received which equates to 474.6 tonnes. No oil/industrial oily water has been received to date.</p> <p>A completed Daily Organic Waste Receival form dated 27/04/2018 was observed and recorded 6,700 litres of organic waste received on that day. This record corresponds with the WIS.</p> <p>The OEMP Section 29 Waste Monitoring Program outlines the process for monitoring the quantity, type and source of waste of waste received and outputs produced on site. Section 29.5 outlines what will be recorded on the Daily Organic Waste Receival form, and it is noted that there are minor discrepancies between the information the OEMP indicates will be recorded and the information actually completed on the form (e.g. transporter address, driver name are not requested). Also some text in the Organic Waste section refers</p>	Compliant	<p><i>Observation 1</i></p> <p><i>It is suggested the OEMP be reviewed to ensure content reflects operational practices that may have been refined since the organic waste storage and treatment facility was commissioned in April 2017.</i></p> <p><i>In particular, it is suggested Section 29 Waste Monitoring Program be reviewed to ensure consistency between OEMP content, current operational practices and information recorded on the Daily Organic Waste Receival form (Attachment 42).</i></p>

Condition	Comment	Compliance Status	Observation or Recommendation
	to waste oil.  It is noted that an updated Daily Organic Waste Receiving form was issued on 15/5/2018 which addresses some of these items.		
<b>OPERATION OF PLANT AND EQUIPMENT</b>  A16. The Applicant shall ensure that all plant and equipment used for the Development is: <ul style="list-style-type: none"> <li>a) maintained in a proper and efficient condition; and</li> <li>b) operated in a proper and efficient manner.</li> </ul>	<p>Section 17 of the OEMP outlines Plant and Equipment Maintenance and Repair procedures and checklists to ensure in-situ plant, mobile plant, equipment and vehicles are inspected and maintained. Checklists referred to include:</p> <ul style="list-style-type: none"> <li>• Weekly Maintenance Checklist (workshop);</li> <li>• Monthly Maintenance Checklist (workshop);</li> <li>• Daily Pre-Trip and End of Day Checklists;</li> <li>• Vehicle and Plant Spot Checklist;</li> <li>• Mobile Plant and Combustion Equipment; and</li> <li>• Pre-Start Check processes are in place.</li> </ul> <p>JJ Richards advised that not all of the above referenced checklists are relevant to the Glendenning Liquid Waste Facility and some relate more so to other aspects of JJ Richards operations. Amendments to Section 17 of the OEMP are currently being prepared for Secretary approval and include deletion of the Weekly and Monthly Checklists.</p> <p>The following checklists are currently being used in relation to the Glendenning Liquid Waste Facility and will be incorporated into a future amendment of the OEMP:</p> <ul style="list-style-type: none"> <li>• FRM-SYD-XXX Site Checklist –</li> </ul>	Compliant	<p><i>Observation 2</i></p> <p><i>It is suggested that JJ Richards review Section 17 of the OEMP and update to reflect relevant checklists. Consideration could also be given to updating terminology to reflect tasks in both the Organics Building and Used Oil Storage Building when both are operational to clearly identify what is required in each area.</i></p>

Condition	Comment	Compliance Status	Observation or Recommendation
	<p>Glendenning;</p> <ul style="list-style-type: none"> <li>Daily Odour Checklist.</li> </ul> <p>Completed examples of the above checklists were observed during the audit. (Site checklist dated 30/04/2018 and Daily Odour Checklist dated 23/04/2018). On review of the Site Checklist, it is presumed the checklist relates to the whole site, but the terminology used could be interpreted to relate only to the Organics Building.</p> <p>A Table of Amendments – OEMP document was provided and demonstrates proposed amendments including deletion of Weekly Maintenance Checklist (workshop) and Monthly Maintenance Checklist (workshop).</p> <p>JJ Richards also have a comprehensive training process in place and Training Records for three (3) staff were observed being Ben Martis (11-12/04/2018), Daniel Lownds (03/05/2018) and Marc Lequesne (03/05/2018).</p>		
<p><b>Dust Management</b></p> <p>B7. The premises shall be maintained in a condition which minimises or prevents the emission of dust from the premises.</p>	<p>A Construction EMP dated 14 February 2016 has been implemented during the construction phase. Section 4.3 of this document addresses dust control.</p> <p>An Operational EMP version 1.3 dated November 2017 is currently in place. Section 22 addresses air management which primarily focuses on odour. The site is completely sealed, as such dust is not likely to be an issue of concern. JJ Richards advised that a street sweeper contractor attends to the JJ Richards depot across the road fortnightly (or as required) and this service can be extended over to liquid waste site.</p>	Compliant	<p><i>Observation 3</i></p> <p><i>It is suggested the OEMP be reviewed to ensure content reflects operational practices that may have been refined since the organic waste storage and treatment facility was commissioned in April 2017.</i></p> <p><i>In particular, it is suggested Section 22 be reviewed to reflect dust management practices.</i></p>

Condition	Comment	Compliance Status	Observation or Recommendation
<p>B11. During operation, the Applicant shall ensure:</p> <p>a) the discharge from all vacuum pumps are sent to the odour control system for treatment before discharging to the atmosphere; and</p> <p>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.</p>	<p>a) JJ Richards advised that positive displacement pumps have replaced vacuum pumps as part of the EPA approved operational change referenced in condition B9. Positive displacement pumps do not need to be vented.</p> <p>b) It was observed during the site inspection that external doors were kept shut at all times, except for the ingress and egress of personnel. No vehicles attended the site during the site inspection.</p>	Compliant	<p>Observation 4</p> <p><i>As part of any proposed future modifications to the Development Consent, it is suggested Condition B11 subsection a) be deleted or amended as it is not relevant to the current approved operations.</i></p>
<p>B13. The Applicant shall carry out the Development in accordance with the Odour Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.</p>	<p>The Development was observed to be operating generally in accordance with the approved Odour Management Plan, however it is understood that odour sampling has not commenced as yet.</p> <p>JJ Richards advised that they are in the process of engaging Air Noise Environment to undertake a Post Commissioning Odour Audit (as per condition B14), which also includes VOC sampling at the inlet and outlet of the carbon filter unit (breakthrough indicator sampling) as outlined in Section 4.3.2 of the OMP.</p> <p>A completed copy of the Daily Odour Checklist (Appendix A from the OMP) dated 23/04/2018 was observed during the audit. JJ Richards advised that no complaints of any nature have been received to date.</p>	Compliant	<p>Observation 5</p> <p><i>As part of any proposed future updates to the OEMP and OMP, suggest consideration be given to the daily odour checklist being incorporated into the Site Checklist - Glendenning to avoid duplication.</i></p>
<p><b>Noise Criteria</b></p> <p>B20. The Applicant shall ensure noise from the operation does not exceed the limits in Table 2 Below</p> <p>Table 2: Operational Noise Limits</p>	<p>JJ Richards advised that their interpretation of this condition is that it is triggered if a complaint is received. No complaints of any nature have been received to date therefore noise monitoring has not occurred since commencement of operations.</p>	Not verified	<p>Observation 6</p> <p><i>As part of any proposed future environmental monitoring program once the site is fully operational, it is</i></p>



Condition			Comment	Compliance Status	Observation or Recommendation						
<table><tr><th>Receiver/location</th><th>Day/Evening/Night</th><th>Sleep disturbance</th></tr><tr><td>Receptor groups 1 and 2*</td><td>36</td><td>46</td></tr></table> <p>Refer to the plan in Appendix 4 for the location of residential receivers</p>			Receiver/location	Day/Evening/Night	Sleep disturbance	Receptor groups 1 and 2*	36	46	Whilst MRA have no reason to believe that the Glendenning Liquid Waste Facility is non-compliant with this requirement, sufficient verifiable evidence was not available at the time of the audit.		<i>suggested consideration be given to undertaking noise monitoring to assess compliance against this criteria.</i>
Receiver/location	Day/Evening/Night	Sleep disturbance									
Receptor groups 1 and 2*	36	46									
<b>SECURITY</b>  B38. The Applicant shall:  a) install and maintain a perimeter fence and security gates on the site; and  b) ensure that the security gates on site are locked whenever the site is unattended.			An Operational EMP version 1.3 dated November 2017 is currently in place. Section 26 outlines Site Security control measures including those required in a) and b). A perimeter fence and security gates were observed to be installed on the site at the time of inspection.	Compliant	<i>Observation 7</i>  <i>As part of any proposed future updates to the OEMP, suggest consideration be given to including perimeter fence and security gate checks into the Site Checklist - Glendenning.</i>						
<b>Operational Environmental Management Plan</b>  C1. The Applicant shall prepare an Operational Environmental Management Plan for the Development to the satisfaction of the Secretary. This strategy must:  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			Following Development Consent approval on 11 January 2017, the facility was constructed between April 2017 and April 2018. An Operational Environmental Management Plan (OEMP) Version 1.3 dated November 2017 is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility. Documentation from the Secretary approving the OEMP dated 22/11/2017 was observed. Requirements of this condition are addressed as follows: a) The OEMP was prepared by JJ Richards who are suitably qualified and experienced in waste	Compliant	<i>Observation 8</i>  <i>As part of any proposed future updates to the OEMP, suggest consideration be given to including dispute resolution procedures into Attachment 36 General Feedback or other relevant section of the OEMP.</i>						

Condition	Comment	Compliance Status	Observation or Recommendation
<p>accountability of all key personnel involved in the environmental management of the Development;</p> <p>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</p> <p>f) describe the procedures that would be implemented to:</p> <p>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development;</p> <p>(ii) receive, handle, respond to, and record complaints;</p> <p>(iii) resolve any disputes that may arise;</p> <p>(iv) respond to any non-compliance; and</p> <p>(v) respond to emergencies.</p>	<p>management;</p> <p>b) Entire OEMP, but in particular Section 1 Scope, Section 2 OEMP Context, Section 4 Integrated Management Systems and Section 6 Corporate Policies outline the strategic framework for environmental management of the Development;</p> <p>c) Section 3 outlines Relevant Statutory Requirements;</p> <p>d) Section 5 outlines Roles, Responsibilities and Organisational Chart;</p> <p>e) Section 11 outlines Performance Monitoring, Section 27 Traffic Management and Attachment 48 Parking Protocol addresses out of hours heavy vehicle parking;</p> <p>f) Section 7 outlines Consultation and Communication, Section 21 outlines Complaints Management and Attachment 36 General Feedback (although dispute resolution doesn't appear to be clearly addressed), Section 12 Corrective Action System, Section 19 Emergency Planning and Management.</p>		
<p><b>Revision of Strategies, Plans and Programs</b></p> <p>C12. Within 3 months of the submission of an:</p> <p>a) annual review under Condition C11 above;</p> <p>b) incident report under Condition C7 above;</p> <p>c) audit under Condition C9 above; or</p> <p>d) any modification to this consent, the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent.</p>	<p>Correspondence dated 22 February 2018 from the Secretary acknowledged receipt of the Annual Environmental Management Report on 16 February 2018. There are no proposed remedial actions required as a result of the annual review.</p>	Not triggered	<p><i>Observation 9</i></p> <p><i>As part of any proposed future updates to the OEMP, suggest consideration be given to inclusion in Section 28.6 to maintain a record of Applicant review prompted by items a) to d) even if the outcome is no proposed changes required.</i></p>

Condition	Comment	Compliance Status	Observation or Recommendation
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><b>A1 What the licence authorises and regulates</b></p> <p>A1.1 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p>	<p>The storage and treatment of grease trap waste and food waste was recently commissioned on 4 April 2018. This commencement date coincides with the issue of the EPA Licence No. 21053 on 4 April 2018. Storage and treatment of used oil and industrial oily water has not yet been commissioned.</p> <p>Condition L2.1 currently limits the site to acceptance of liquid food waste and grease trap waste. An amendment/variation to EPA Licence No. 21053 will be required prior to commencement of the Used Oil Storage Area at the Glendenning facility.</p> <p>Condition L2.2 currently limits the amount of waste that can be stored to 412 tonnes. A Waste Inventory Spreadsheet (WIS) system is in place at the moment to record the amount of waste received and stored. This will be automated with the weighbridge system within the month. The standard conversion rate used is 1T:1KL.</p> <p>The WIS was observed and showed that between 04/04/2018 and 08/05/2018 a total of 474,600 litres/474.6 tonnes of grease trap waste had been received. Taking into account sludge dispatch that has occurred during this same period, the WIS indicates less than 412 tonnes of waste has been stored on site. No used oil/industrial oily water has been received to date.</p>	Compliant	<p><i>Observation 10</i></p> <p><i>It is suggested JJ Richards seek amendment to EPA Licence No. 21053 prior to commencement of the Used Oil Storage Area. Condition L2.2 may also need review should more than 412 tonnes need to be stored.</i></p>

Condition	Comment	Compliance Status	Observation or Recommendation												
<p><b>P1 Location of monitoring/discharge points and areas</b></p> <p>P1.1 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"> <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 "R1456-90-08 (CF_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 "R1456-90-08 (CF_WS LOCATION)" DOC18/178813	<p>JJ Richards advised monitoring will be conducted in accordance with this condition and that they are in the process of engaging Air Noise Environment to undertake a Post Commissioning Odour Audit. The scope of works for the Odour Audit includes reference to Condition B14 of the Development Consent and also Condition E4.2 of the EPA Licence No. 21053.</p> <p>Drawing No. R1456-10-02 "Proposed Site Plan" was provided as the map referenced in the Location Description section of the Air table in Condition P1.1. Whilst the general location for sampling is clear, the exact location of the monitoring points is unclear from this figure.</p>	Compliant	<p><i>Observation 11</i></p> <p><i>As part of any proposed future updates to the OEMP and Odour Management Plan, suggest consideration be given to inclusion of a figure clearly identifying air emission monitoring/discharge points determined following the Post Commissioning Odour Audit to the undertaken in the near future.</i></p>
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 "R1456-90-08 (CF_WS LOCATION)" DOC18/178813												
<p><b>L2 Waste</b></p> <p>L2.1 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.</p> <p>This condition does not limit any other conditions in this licence.</p>	<p>As per Development Consent Condition A6, permitted wastes under DA SSD 6767 include grease trap waste (K110), Liquid food waste (K120), waste mineral oils (J100) and oil/hydrocarbons mixtures/emulsions in water (J120). At present the EPA Licence No. 21053 Condition L2.1 only allows acceptance of grease trap waste and liquid food waste at the facility. JJ Richards advised only grease trap waste is currently accepted and once that process is bedded down, pulped liquid food waste covered by K120 will start coming to the site within the next fortnight.</p> <p>The OEMP Section 29 Waste Monitoring Program outlines the process for monitoring the quantity, type and source of waste of waste received and outputs produced on site. The Waste Inventory Spreadsheet currently in place was observed and indicates only grease trap waste has been received to date.</p> <p>JJ Richards also have a comprehensive</p>	Compliant	<p><i>Observation 12</i></p> <p><i>It is suggested JJ Richards seek amendment to EPA Licence No. 21053 prior to commencement of the Used Oil Storage Area. Condition L2.2 may also need review should more than 412 tonnes need to be stored.</i></p>												

Condition	Comment	Compliance Status	Observation or Recommendation																									
<table><tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr><tr><td>K120</td><td>Liquid Food Waste</td><td></td><td>Waste processing (non-thermal treatment)</td><td></td></tr><tr><td>K110</td><td>Grease trap waste</td><td></td><td>Waste storage</td><td></td></tr><tr><td></td><td></td><td></td><td>Waste processing (non-thermal treatment)</td><td></td></tr><tr><td></td><td></td><td></td><td>Waste storage</td><td></td></tr></table>	Code	Waste	Description	Activity	Other Limits	K120	Liquid Food Waste		Waste processing (non-thermal treatment)		K110	Grease trap waste		Waste storage					Waste processing (non-thermal treatment)					Waste storage		training process in place and Training Records for three (3) staff were observed being Ben Martis (11-12/04/2018), Daniel Lownds (03/05/2018) and Marc Lequesne (03/05/2018). Topics covered as noted on these training forms included Waste Monitoring Program including waste acceptance, receipt and dispatch forms.		
Code	Waste	Description	Activity	Other Limits																								
K120	Liquid Food Waste		Waste processing (non-thermal treatment)																									
K110	Grease trap waste		Waste storage																									
			Waste processing (non-thermal treatment)																									
			Waste storage																									
<b>L2.2</b> The quantity of waste stored at any one time at the premises must not exceed 412 tonnes.	A Waste Inventory Spreadsheet (WIS) system is in place at the moment to record the amount of waste received and stored. This will be automated with the weighbridge system within the month. Standard conversion rate used is 1T:1KL. The WIS was observed and showed that between 04/04/2018 and 08/05/2018 a total of 474,600 litres/474.6 tonnes of grease trap waste had been received. Taking into account sludge dispatch that has occurred during this same period, the WIS indicates less than 412 tonnes of waste has been stored on site at any one time. No used oil/industrial oily water has been received to date. The WIS also has an in-built warning mechanism such that when the number is greater than 390,000 the cell turns red to warn they are close to the 412 tonne limit.	Compliant	<i>Observation 13</i>  <i>It is suggested JJ Richards seek amendment to EPA Licence No. 21053 prior to commencement of the Used Oil Storage Area. Condition L2.2 may also need review should more than 412 tonnes need to be stored.</i>																									
<b>O2 Maintenance of plant and equipment</b>  <b>O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:</b>  a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Section 17 of the OEMP outlines Plant and Equipment Maintenance and Repair procedures and checklists to ensure in-situ plant, mobile plant, equipment and vehicles are inspected and maintained. Checklists referred to include: <ul style="list-style-type: none"><li>Weekly Maintenance Checklist (workshop);</li><li>Monthly Maintenance Checklist (workshop);</li><li>Daily Pre-Trip and End of Day Checklists;</li><li>Vehicle and Plant Spot Checklist;</li></ul>	Compliant	<i>Observation 14</i>  <i>As per Observation 2, it is suggested that JJ Richards review Section 17 of the OEMP and update to reflect relevant checklists. Consideration could also be given to updating terminology to reflect tasks in both the Organics Building and Used Oil Storage Building when both are operational to clearly</i>																									

Condition	Comment	Compliance Status	Observation or Recommendation
	<ul style="list-style-type: none"> <li>Mobile Plant and Combustion Equipment; and</li> <li>Pre-Start Check processes are in place.</li> </ul> <p>JJ Richards advised that not all of the above referenced checklists are relevant to the Glendenning Liquid Waste Facility and some relate more so to other aspects of JJ Richards operations. Amendments to Section 17 of the OEMP are currently being prepared for Secretary approval and include deletion of the Weekly and Monthly Checklists.</p> <p>The following checklists are currently being used in relation to the Glendenning Liquid Waste Facility and will be incorporated into a future amendment of the OEMP:</p> <ul style="list-style-type: none"> <li>FRM-SYD-XXX Site Checklist – Glendenning;</li> <li>Daily Odour Checklist.</li> </ul> <p>Completed examples of the above checklists were observed during the audit. (Site checklist dated 30/04/2018 and Daily Odour Checklist dated 23/04/2018). On review of the Site Checklist, it is presumed the checklist relates to the whole site, but the terminology used could be interpreted to relate only to the Organics Building.</p> <p>A Table of Amendments – OEMP document was provided and demonstrates proposed amendments including deletion of Weekly Maintenance Checklist (workshop) and Monthly Maintenance Checklist (workshop).</p> <p>JJ Richards also have a comprehensive training process in place and Training Records for three (3) staff were observed being Ben Martis (11-12/04/2018), Daniel Lownds (03/05/2018) and Marc Lequesne (03/05/2018)</p>		<p><i>identify what is required in each area.</i></p>

Condition	Comment	Compliance Status	Observation or Recommendation
<b>M6.2</b> 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.	JJ Richards have a telephone Complaints Line listed on their website (Glendenning page).	Compliant	<i>Observation 15</i>  <i>Should JJ Richards require new signage for the facility entrance, consideration could be given to including the telephone complaints line information on this signage.</i>



## 4.0 ENVIRONMENTAL AUDIT FINDINGS

### DEVELOPMENT CONSENT - SCHEDULE B

Condition	Comment	Compliance Status	Observation or Recommendation
<b>PART A - ADMINISTRATIVE CONDITIONS</b>			
<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b>  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.	<p>Following Development Consent approval on 11 January 2017, the facility was constructed between April 2017 and April 2018. The storage and treatment of grease trap waste and food waste was recently commissioned on 4 April 2018. This commencement date coincides with the issue of the EPA Licence No. 21053 on 4 April 2018. Storage and treatment of used oil and industrial oily water has not yet been commissioned.</p> <p>A Construction EMP dated 14 February 2016 has been being implemented throughout the construction phase.</p> <p>An Operational EMP (OEMP) version 1.3 dated November 2017 is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility.</p> <p>Third party certifications (via Sustainable Certifications) are in place for an integrated management system incorporating ISO14001 (EMS), ISO 9001(QMS) and AS/NZ 4801(Safety).</p>	Compliant	
<b>TERMS OF CONSENT</b>  A2. The Applicant shall carry out the Development in accordance with the: <ul style="list-style-type: none"> <li>a) Development Application (SSD 6767);</li> </ul>	<p>A Construction EMP (CEMP) dated 14 February 2016 has been implemented throughout the construction phase.</p> <p>The Development project managers Duggan &amp; Hede Pty Ltd have provided written confirmation dated 14 May 2018 that they supervised construction of the</p>	Compliant	



Condition	Comment	Compliance Status	Observation or Recommendation
b) EIS; c) RTS; d) Conditions in Schedule B; e) The development layout plans and drawings listed at Appendix 1; and f) Management and mitigation measures as identified in Appendix 5.	<p>facility and construction practices were in accordance with the sites' CEMP.</p> <p>An Operational EMP (OEMP) version 1.3 dated November 2017 is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility.</p> <p>Both the CEMP and OEMP were prepared based on the reference criteria outlined in a) to f).</p> <p>Based on documentation observed and observations during the site inspection, the Development is being carried out generally in accordance with the reference criteria outlined in a) to f).</p>		
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.	Note. Condition for information purposes.	Note	
A4. The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: <ul style="list-style-type: none"> <li>(a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this consent; and</li> <li>(b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.</li> </ul>	<p>JJ Richards advised no requests of this nature have been received from the Secretary to date. During the DA approval process, the Department requested consultation be undertaken with the EPA in relation to the odour control system and building enclosure requirements. This consultation occurred as evidenced in EPA correspondence dated 3 April 2018.</p> <p>It was also advised that should further requests be received from the Secretary, the JJ Richards Legal Team will manage them via corporate system processes.</p>	Compliant	
<b>LIMITS OF CONSENT</b> A5. This consent lapses five years after the date from which it operates, unless the	Development Consent SSD 6767 was issued on 11 January 2017, the facility was constructed between April 2017 and April 2018. The storage and treatment of grease trap waste and food waste was recently	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
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.	commissioned on 4 April 2018. This commencement date coincides with the issue of the EPA Licence 21053 on 4 April 2018.		
<b>WASTE LIMITS</b>  A6. The Applicant shall not receive or process on Site more than 52,000 tonnes of liquid waste per calendar year comprising: <ul style="list-style-type: none"> <li>c) 42,000 tonnes of liquid organic waste (K110 and K120 wastes); and</li> <li>d) 10,000 tonnes of used oil/industrial oily water (J110 and J120 wastes).</li> </ul>	<p>A Waste Inventory Spreadsheet (WIS) system is in place at the moment to record the amount of waste received. This will be automated with the weighbridge system within the month. Standard conversion rate used is 1T:1KL. The WIS was observed and showed that between 04/04/2018 and 08/05/2018 a total of 474,600 litres had been received which equates to 474.6 tonnes. No oil/industrial oily water has been received to date.</p> <p>A completed <i>Daily Organic Waste Receival</i> form dated 27/04/2018 was observed and recorded 6,700 litres of organic waste received on that day. This record corresponds with the WIS.</p> <p>The OEMP Section 29 Waste Monitoring Program outlines the process for monitoring the quantity, type and source of waste of waste received and outputs produced on site. Section 29.5 outlines what will be recorded on the <i>Daily Organic Waste Receival</i> form, and it is noted that there are minor discrepancies between the information the OEMP indicates will be recorded and the information actually completed on the form (e.g. transporter address, driver name are not requested). Also some text in the Organic Waste section refers to waste oil.</p> <p>It is noted that an updated <i>Daily Organic Waste Receival</i> form was issued on 15/5/2018 which addresses some of these items.</p>	Compliant	<p><i>Observation 1</i></p> <p>It is suggested the OEMP be reviewed to ensure content reflects operational practices that may have been refined since the organic waste storage and treatment facility was commissioned in April 2017.</p> <p>In particular, it is suggested Section 29 Waste Monitoring Program be reviewed to ensure consistency between OEMP content, current operational practices and information recorded on the <i>Daily Organic Waste Receival</i> form (Attachment 42).</p>
<b>STATUTORY REQUIREMENTS</b>  A7. The Applicant shall ensure that all licences,	EPA Licence No. 21053 was issued on 4 April 2018 for the Glendenning Liquid Waste Facility. It is noted that the EPA Licence No.21053 currently only permits	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
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.	<p>acceptance of Liquid Food Waste and Grease trap waste (maximum 412 tonnes).</p> <p>Sydney Water Corporation advised during the audit consultation process (email dated 27/04/2018) that a consent to discharge industrial trade wastewater has been granted for the Glendenning Liquid Waste Facility. Sydney Waste Corporation Consent to Discharge Industrial Trade Wastewater 39115.1.A. (Activity Grease Trap Waste Disposal) dated 03/04/2018 was observed during the audit.</p> <p>JJ Richards advised that an Environment Licence Register is maintained by the Legal Team and includes all licences held the site and applicable renewal dates.</p>		
<b>BUILDING CODE OF AUSTRALIA</b>  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> .	<p>Construction Certificate Number 170052 issued by the Greenfield Certifiers dated 04/04/2017 was observed for the Building construction.</p> <p>The Final Occupation Certificate 170052 dated 09/05/2018 issued by Greenfield Certifiers was observed.</p>	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.	<p>The Final Inspection Report (for the Organics building only) issued by Greenfield Certifiers dated 13/02/2018 was observed.</p> <p>The final Occupation Certificate 170052 dated 09/05/2018 issued by Greenfield Certifiers was observed and addresses the requirements of this condition.</p>	Compliant	
<b>ENGINEERING WORKS</b>  A10. All engineering works must be designed and	<p>Engineering Construction Certificate Number CC-17-00214 issued by the Blacktown City Council dated</p>	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
<p>undertaken in accordance with the relevant aspects of:</p> <ul style="list-style-type: none"> <li>a) Council's Works Specification - Civil (Current Version);</li> <li>b) Council's Engineering Guide for Development (Current Version);</li> <li>c) Council's Development Control Plan (Current Version) including Part J — Water Sensitive Urban Design and Integrated Water Cycle Management;</li> <li>d) Council's Soil Erosion and Sediment Control Policy (Current Version);</li> <li>e) Council's On Site Detention General Guidelines and Checklist; and</li> <li>f) Upper Parramatta River Catchment Trust's On Site Stormwater Detention Handbook THIRD Edition December 1999.</li> </ul> <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>	<p>21/03/2017) was observed.</p> <p>The Blacktown City Council Final Site Inspection Report dated 16/02/2018 was observed with the comment "All works complete to Council satisfaction</p> <p>The final Occupation Certificate 170052 dated 09/05/2018 issued by Greenfield Certifiers was observed.</p>		
<p><b>DEMOLITION</b></p> <p>A11. 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>	<p>SafeWork NSW <i>Notice of intent to commence demolition work</i> Notification number 941R-00129939-01 dated 08/03/2017 was observed.</p> <p>The demolition contractor A.M.Y Excavation &amp; Demolition licence AD203497, insurances and project plan (including risk assessment) dated 17/03/2017 was observed.</p>	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
<b>SURRENDER OF CONSENT</b>  A12. 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.  <i>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&amp;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.</i>	Correspondence to Blacktown City Council dated 28/11/2017 providing 3 x completed Notices of Surrender of Development Consent related to 14 Rayben St, Glendenning was observed.  Consents surrendered were: 1. DA-93-263 – Truck maintenance workshop, truck holding yard and ancillary offices; 2. BA-93-4570 – Building permit; and 3. IA-97-3020 – Above ground diesel tank.	Compliant	
<b>STAGED SUBMISSION OF PLANS OR PROGRAMS</b>  A13. With the approval of the Secretary, the Applicant may: a) submit any strategy, plan or program required by this consent on a progressive basis; and/or b) combine any strategy, plan or program required by this consent.	JJ Richards advised no requests of this nature have been made to the Secretary to date.	Not triggered	
A14. 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.	Not triggered. Refer to A13.	Not triggered	

Condition	Comment	Compliance Status	Observation or Recommendation
<b>EVIDENCE OF CONSULTATION</b>  A15. Where consultation with any public authority is required by the conditions of this consent, the Applicant shall: <ul style="list-style-type: none"> <li>a) consult with the relevant public authority prior to submitting the required documentation to the Secretary or the PCA for approval, where required;</li> <li>b) submit evidence of this consultation as part of the relevant documentation required by the conditions of this consent; and</li> <li>c) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant or any person acting on this Development consent.</li> </ul>	Agency consultation has been conducted as follows: <ul style="list-style-type: none"> <li>a) Agencies involved in the original issue of the SEARS by the Dept of Planning &amp; Environment (4 December 2014);</li> <li>b) Stakeholder Consultation pre-lodgement and Referrals made to agencies at the time of lodgement of the EIS (8 April 2016);</li> <li>c) Agencies that provided comments on the EIS post lodgement (May / June 2016);</li> <li>d) Current EPA Contact for the issued Licence for the site;</li> <li>e) Independent Environmental Audit (IES) consultation email sent to relevant agencies on 27/04/2018 prior to the site inspection undertaken on 9/05/2018.</li> </ul> Consultation with key agencies involved with the Development was undertaken as part of the Independent Environmental Audit (IEA). An email seeking agency feedback was sent to key agencies on 27/04/2018. Responses were received from Sydney Water (dated 30/04/2018) and Blacktown City Council's Environmental Health Unit (dated 17/5/2018) and were considered in the IEA process.	Compliant	
<b>OPERATION OF PLANT AND EQUIPMENT</b>  A16. The Applicant shall ensure that all plant and equipment used for the Development is: <ul style="list-style-type: none"> <li>c) maintained in a proper and efficient condition; and</li> <li>d) operated in a proper and efficient manner.</li> </ul>	Section 17 of the OEMP outlines Plant and Equipment Maintenance and Repair procedures and checklists to ensure in-situ plant, mobile plant, equipment and vehicles are inspected and maintained. Checklists referred to include: <ul style="list-style-type: none"> <li>• Weekly Maintenance Checklist (workshop);</li> <li>• Monthly Maintenance Checklist (workshop);</li> <li>• Daily Pre-Trip and End of Day Checklists;</li> <li>• Vehicle and Plant Spot Checklist;</li> <li>• Mobile Plant and Combustion Equipment; and</li> <li>• Pre-Start Check processes are in place.</li> </ul> JJ Richards advised that not all of the above referenced checklists are relevant to the Glendenning	Compliant	<i>Observation 2</i>  It is suggested that JJ Richards review Section 17 of the OEMP and update to reflect relevant checklists. Consideration could also be given to updating terminology to reflect tasks in both the Organics Building and Used Oil Storage Building when both are operational to clearly identify what is required in each area.

Condition	Comment	Compliance Status	Observation or Recommendation
	<p>Liquid Waste Facility and some relate more so to other aspects of JJ Richards operations. Amendments to Section 17 of the OEMP are currently being prepared for Secretary approval and include deletion of the Weekly and Monthly Checklists.</p> <p>The following checklists are currently being used in relation to the Glendenning Liquid Waste Facility and will be incorporated into a future amendment of the OEMP:</p> <ul style="list-style-type: none"> <li>• FRM-SYD-XXX Site Checklist – Glendenning;</li> <li>• Daily Odour Checklist.</li> </ul> <p>Completed examples of the above checklists were observed during the audit. (Site checklist dated 30/04/2018 and Daily Odour Checklist dated 23/04/2018). On review of the Site Checklist, it is presumed the checklist relates to the whole site, but the terminology used could be interpreted to relate only to the Organics Building.</p> <p>A Table of Amendments – OEMP document was provided and demonstrates proposed amendments including deletion of Weekly Maintenance Checklist (workshop) and Monthly Maintenance Checklist (workshop).</p> <p>JJ Richards also have a comprehensive training process in place and Training Records for three (3) staff were observed being Ben Martis (11-12/04/2018), Daniel Lownds (03/05/2018) and Marc Lequesne (03/05/2018).</p>		
<b>PROTECTION OF PUBLIC INFRASTRUCTURE</b>  A17. The Applicant shall: <ul style="list-style-type: none"> <li>a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the</li> </ul>	JJ Richards advised that there has been no damage to public infrastructure to date.	Not triggered	



Condition	Comment	Compliance Status	Observation or Recommendation
Development; and  b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the Development.			
<b>PART B – ENVIRONMENTAL PERFORMANCE</b>			
<b>WASTE MANAGEMENT</b>  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 EPA.	<p>As per condition A6, permitted wastes under DA SSD 6767 include grease trap waste (K110), Liquid food waste (K120), waste mineral oils (J100) and oil/hydrocarbons mixtures/emulsions in water (J120). At present the EPA Licence No. 21053 only allows acceptance of grease trap waste and liquid food waste at the facility. JJ Richards advised only grease trap waste is currently accepted and once that process is bedded down, pulped liquid food waste covered by K120 will start coming to the site.</p> <p>Section 29 of the OEMP Waste Monitoring Program outlines the process for monitoring the quantity, type and source of waste of waste received and outputs produced on site. The Waste Inventory Spreadsheet currently in place was observed and indicates only grease trap waste has been received to date.</p> <p>JJ Richards also have a comprehensive training process in place and Training Records for three (3) staff were observed being Ben Martis (11-12/04/2018), Daniel Lownds (03/05/2018) and Marc Lequesne (03/05/2018). Topics covered as noted on these training forms included Waste Monitoring Program including waste acceptance, receipt and dispatch forms.</p>	Compliant	
B2. From the commencement of operation, the Applicant shall implement a Waste Monitoring Program for the Development. The Program	Section 29 of the OEMP documents the Waste Monitoring Program (WMP) for the Development. The includes training, waste acceptance criteria, volume	Compliant	



Condition	Comment	Compliance Status	Observation or Recommendation
<p>must:</p> <p>a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;</p> <p>b) include suitable provision to monitor the:</p> <p>(i) quantity, type and source of waste received on site; and</p> <p>(ii) quantity, type and quality of the outputs produced on site</p> <p>c) ensure that:</p> <p>(i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and</p> <p>(ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste.</p>	<p>restrictions, processes for waste receipt, dispatch, tracking and transport requirements.</p> <p>Requirements of this condition are addressed as follows:</p> <p>a) The WMP was prepared by JJ Richards who are suitably qualified and experienced in waste handling. OEMP Version 1.3 dated November 2017 confirms the WMP was prepared prior to the commencement of operation on 4 April 2018;</p> <p>b) (i) WMP Section 29.3 outlines the type of waste that can be received. WMP Section 29.4 outlines waste volume restrictions. WMP Section 29.5 outlines waste receipt processes for the different waste types. (ii) WMP Section 29.6 outlines waste dispatch processes including quantity, type and quality of outputs.</p> <p>c) (i) WMP Section 29.7 outlines waste tracking requirements. (ii) WMP Section 29.10 outlines hazardous waste and waste tracking training packages Training Records for three (3) staff were observed being Ben Martis (11-12/04/2018), Daniel Lownds (03/05/2018) and Marc Lequesne (03/05/2018). Topics covered as noted on these training forms included Waste Monitoring Program including site approvals, waste tracking guide NSW and hazardous waste and waste tracking training completed. JJ Richards also advised grease trap waste is managed through the Wastesafe Program implemented by Sydney Water. The Sydney Water website identifies JJ Richards as a Wastesafe transporter.</p>		
B3. The Applicant shall ensure the transportation	Section 29 of the OEMP documents the Waste Monitoring Program for the Development. The WMP	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
<p>of waste is:</p> <p>a) undertaken by a transporter authorised to transport such wastes; and</p> <p>b) to a place that can lawfully accept that waste.</p>	<p>addresses training, waste acceptance criteria, volume restrictions, and processes for waste receipt, dispatch, tracking and transport requirements.</p> <p>Section 9 of the OEMP outlines supplier and subcontractor management and Attachment 12 outlines the supplier/subcontractor approval processes.</p> <p>At present, there are approximately six (6) JJ Richards trucks coming the Glendenning Liquid Waste Facility. Veolia are expected to start bringing material to Glendenning in the future.</p> <p>Supplier Subcontractor Registration documentation was observed for Veolia Environmental Services including EPA approvals trackable waste transport, waste storage and processing at Port Botany Resource Recovery Facility and waste processing and disposal at Horsley Park Waste Management Facility.</p>		
<p><b>Limits on Outputs</b></p> <p>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:</p> <p>a) liquid food waste approved for application to land under the POEO Act and Waste Regulation; and</p> <p>b) treated grease trap waste approved for application to land under the POEO Act and Waste Regulation.</p>	<p>Sydney Waste Corporation Consent to Discharge Industrial Trade Wastewater 39115.1.A. (Activity Grease Trap Waste Disposal) dated 03/04/2018 was observed during the audit.</p> <p>NSW standard exemption is in place for land application of treated grease trap waste. (Resource Recovery Exemption under Part 9 of the PEOP Regulation 2014).</p> <p>JJ Richards advised that solid screening waste is the only other waste generated on-site and is sent to an approved putrescible landfill for disposal (e.g. Veolia).</p>	Compliant	
<p><b>AIR QUALITY</b></p> <p><b>Meteorological Monitoring</b></p> <p>B5. Prior to the commencement of operation, the</p>	<p>An installation and commissioning report from Thompson Environmental Systems dated 28/11/2017 was observed. This confirms installation of a Visual Master Pro meteorological station prior to</p>	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
Applicant shall ensure that there is a suitable meteorological station on the site that complies with the requirements in the latest version of the <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i> . The Applicant shall operate the meteorological station for the life of the Development.	<p>commencement of the operation on 4 April 2018.</p> <p>The data logging system is currently installed at Duggan &amp; Hede's office and JJ Richards are progressing towards having it installed within their corporate systems which will allow any nominated staff member to access the data.</p> <p>Screenshots of the weather station system and data recorded on 10/05/2018 were provided showing windspeed, direction and temperature.</p> <p>The meteorological station is positioned near the Rayben Street entrance gate in an area representative of the conditions in the area of interest in a position close to a power source, not prone to environmental impacts such as flooding or subsidence and not subject to damage by plant and equipment (fenced area). A detailed audit against the <i>Approved Methods for Sampling of Air Pollutants in NSW</i> was not undertaken during the site inspection.</p>		
<b>Construction Mitigation</b>  B6. During construction, the Applicant shall ensure that: <ul style="list-style-type: none"> <li>a) all vehicles on site do not exceed a speed of 30 kilometres per hour,</li> <li>b) all loaded construction vehicles entering or leaving the site have their loads covered; and</li> <li>c) all construction vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking the materials on public roads.</li> </ul>	<p>A Construction EMP dated 14 February 2016 has been implemented during the construction phase. Review of this document indicated:</p> <ul style="list-style-type: none"> <li>a) On site speed limit of 10km/hr;</li> <li>b) Cover the loads of all vehicles leaving the site with overburden or soil;</li> <li>c) A construction exit/vehicle shakedown device shall be installed near the construction area.</li> </ul> <p>The Development project managers Duggan &amp; Hede Pty Ltd have provided written confirmation dated 10 May 2018 that they supervised construction of the facility and construction practices were in accordance with the sites' CEMP.</p>	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
<b>Dust Management</b>  B7. The premises shall be maintained in a condition which minimises or prevents the emission of dust from the premises.	<p>A Construction EMP dated 14 February 2016 has been implemented during the construction phase. Section 4.3 of this document addresses dust control.</p> <p>An Operational EMP version 1.3 dated November 2017 is currently in place. Section 22 addresses air management which primarily focuses on odour. The site is completely sealed, as such dust is not likely to be an issue of concern. JJ Richards advised that a street sweeper contractor attends to the JJ Richards depot across the road fortnightly (or as required) and this service can be extended over to liquid waste site.</p>	Compliant	<p><i>Observation 3</i></p> <p>It is suggested the OEMP be reviewed to ensure content reflects operational practices that may have been refined since the organic waste storage and treatment facility was commissioned in April 2017.</p> <p>In particular, it is suggested Section 22 be reviewed to reflect dust management practices.</p>
<b>Odour</b>  B8. The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	<p>No offensive odour observed during the site inspection. JJ Richards advised that no complaints of any nature have been received to date.</p> <p>An Operational EMP version 1.3 dated November 2017 is currently in place. Section 22 addresses air management which primarily focuses on odour management procedures.</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.	<p>It was observed during the site inspection that the Organics Building was not completely sealed, with ventilation screening in the lower portion of the roller doors and minor gaps/voids in some external walls. JJ Richards advised that discussion had occurred with the EPA to permit this. Correspondence from the EPA dated 3 April 2018 was observed confirming approval of alternate operations and inclusion of additional conditions requiring all food wastes to be stored in sealed tanks vented to the activated carbon filter and the DAF unit to be contained in a sealed room which also vented to the activated carbon filter.</p>	Compliant	
B10. Prior to the commencement of operation, the activated carbon filters (or equivalent odour emission control system approved by the	<p>A Commissioning Report for the Odour Pro (activated carbon filter odour control unit) was observed indicating installation on 24/01/2018. This confirms</p>	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
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.	installation of the odour emission control system prior to commencement of the operation on 4 April 2018.		
<p>B11. During operation, the Applicant shall ensure:</p> <p>c) the discharge from all vacuum pumps are sent to the odour control system for treatment before discharging to the atmosphere; and</p> <p>d) 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.</p>	<p>c) JJ Richards advised that positive displacement pumps have replaced vacuum pumps as part of the EPA approved operational change referenced in condition B9. Positive displacement pumps do not need to be vented.</p> <p>d) It was observed during the site inspection that external doors were kept shut at all times, except for the ingress and egress of personnel. No vehicles attended the site during the site inspection.</p>	Compliant	<p><i>Observation 4</i></p> <p>As part of any proposed future modifications to the Development Consent, it is suggested Condition B11 subsection a) be deleted or amended as it is not relevant to the current approved operations.</p>
<p><b>Odour Management Plan</b></p> <p>B12. Prior to the commencement of construction, the Applicant shall prepare an Odour Management Plan to the satisfaction of the Secretary. The Plan must:</p> <p>a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA,</p> <p>b) describe the measures that would be implemented on site to ensure:</p> <p>(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;</p> <p>(ii) compliance with the</p>	<p>Section 22 of the OEMP documents Air Management processes and is supported by Attachment 37 provides a more detailed the Odour Management Plan (OMP). Requirements of this condition are addressed as follows:</p> <p>a) The OMP was prepared by Air Noise Environment who are suitably qualified and have considerable experience in air quality management. The OMP is dated 21 March 2017 and construction commenced in April 2017. Section 2.3 of the OMP references consultation with the EPA during preparation of this document;</p> <p>b) Section 4 of the OMP describes measures for the Management and Control of odour;</p> <p>(i) Section 4.3 of the OMP describes the Odour Control System;</p> <p>(ii) Section 3 of the OMP discusses legislation and criteria;</p> <p>(iii) Section 4.2 of the OMP describes Odour Management Measures including</p>	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
<p>relevant conditions of this consent; and</p> <p>(iii) contingency measures are deployed to minimise impacts should adverse odour emissions occur or appear likely to occur;</p> <p>c) include procedures for the monitoring of odour emissions in accordance with the requirements of the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> 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:</p> <p>(i) results of the complaints handling system; and</p> <p>(ii) system and performance review for continuous improvement;</p> <p>d) include well defined performance measures and triggers for the deployment of odour mitigation and contingency measures;</p> <p>e) include a protocol to determine the occurrence of an exceedance of any criteria in the EPL should an exceedance occur;</p> <p>f) include a protocol for detecting activated carbon breakthrough, and initiating active carbon filter change out (if activated carbon filters are the</p>	<p>response mechanisms and contingency measures;</p> <p>c) Section 4.4 of the OMP describes Odour Sampling;</p> <p>(i) Section 5.1 describes Complaint Handling processes;</p> <p>(ii) Section 6.2 describes processes for Updating the Management Plan;</p> <p>d) Section 4.2 of the OMP describes Odour Management Measures including response mechanisms and contingency measures;</p> <p>e) Section 5.2 of the OMP discusses Identifying Exceedances, whilst Section 5.2.2 specifically outlines the protocol for determining an exceedance;</p> <p>f) Section 4.3.2 of the OMP describes the procedure for detecting activate carbon breakthrough;</p> <p>g) Section 4.3.3 discusses Design/System Failure including contingency measures;</p> <p>h) Section 5.3 of the OMP outlines records to be kept of odourous loads and associated response mechanisms. Appendix B of the OMP outlined waste acceptance procedures and a template for recoding this information.</p>		

Condition	Comment	Compliance Status	Observation or Recommendation
<p>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>			
<p>B13. The Applicant shall carry out the Development in accordance with the Odour Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.</p>	<p>The Development was observed to be operating generally in accordance with the approved Odour Management Plan, however it is understood that odour sampling has not commenced as yet.</p> <p>JJ Richards advised that they are in the process of engaging Air Noise Environment to undertake a Post Commissioning Odour Audit (as per condition B14), which also includes VOC sampling at the inlet and outlet of the carbon filter unit (breakthrough indicator sampling) as outlined in Section 4.3.2 of the OMP. A completed copy of the Daily Odour Checklist (Appendix A from the OMP) dated 23/04/2018 was observed during the audit. JJ Richards advised that no complaints of any nature have been received to date.</p>	Compliant	<p><i>Observation 5</i></p> <p>As part of any proposed future updates to the OEMP and OMP, suggest consideration be given to the daily odour checklist being incorporated into the Site Checklist - Glendenning to avoid duplication.</p>
<p><b>Odour Audit</b></p> <p>B14. 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> <p>a) be carried out by a suitably qualified, experienced and independent expert(s) whose appointment has been endorsed by the Secretary;</p>	<p>The storage and treatment of grease trap waste and food waste was recently commissioned on 4 April 2018. This commencement date coincides with the issue of the EPA Licence No. 21053 on 4 April 2018.</p> <p>JJ Richards advised that they are in the process of engaging Air Noise Environment to undertake a Post Commissioning Odour Audit. The scope of works for the Odour Audit includes reference to the Condition B14 and also Condition E4.2 of the EPA Licence No. 21053.</p>	Not triggered	



Condition	Comment	Compliance Status	Observation or Recommendation
<p>b) audit the Development whilst in full operation and during receipt of organic waste;</p> <p>c) include sampling and analysis undertaken in accordance with an EPL;</p> <p>d) include a summary of air and odour emission related complaints and any actions that were carried out to address the complaints;</p> <p>e) if odour complaints are received, the audit team must review the meteorological data for the Site and the region to establish the likelihood that the source of odour originated from the development. If it is likely that odour originated from the development it must be reported in accordance with condition C7,</p> <p>f) validate the Development against the odour predictions in the EIS and RTS;</p> <p>g) review design and management practices of the Development against industry best practice for air emissions and odour management; and</p> <p>h) include an action plan that identified and priorities additional air and odour emission mitigation measures that may be necessary to reduce air emissions.</p> <p><i>Note: The odour audit must be prepared so it addresses the requirements of this consent and the EPL for the Development.</i></p>			

Condition	Comment	Compliance Status	Observation or Recommendation													
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.	JJ Richards advised that they intend to comply with this timeframe and that a task reminder is set in the Legal Team calendar to submit the audit report.	Not triggered														
B16. The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Air Emissions Audit.	JJ Richards advised no requests of this nature have been made by the Secretary to date. Following the Odour Audit, the Odour Management Plan will be reviewed and updated if required.	Not triggered														
<b>NOISE AND VIBRATION</b> <b>Construction and Operation Hours</b>  B17. The Applicant shall comply with the construction and operation hours in Table 1 unless otherwise agreed to in writing by the Secretary.  <b>Table 1: Hours of Construction and Operation</b> <table><tr><th>Activity</th><th>Day</th><th>Hours</th></tr><tr><td rowspan="3">Construction</td><td><b>Monday — Friday</b></td><td><b>7 am to 6 pm</b></td></tr><tr><td>Saturday</td><td>8 am to 1 pm</td></tr><tr><td>Sunday &amp; Public</td><td>Nil</td></tr><tr><td>Operation</td><td>Monday —</td><td>4 am to 9 pm</td></tr></table>	Activity	Day	Hours	Construction	<b>Monday — Friday</b>	<b>7 am to 6 pm</b>	Saturday	8 am to 1 pm	Sunday & Public	Nil	Operation	Monday —	4 am to 9 pm	JJ Richards advised that both the construction phase and operations have occurred during the nominated timeframes.  The Development project managers Duggan & Hede Pty Ltd have provided written confirmation dated 14 May 2018 that they supervised construction of the facility and construction practices were in accordance with the sites' CEMP which incorporates these construction hours.	Compliant	
Activity	Day	Hours														
Construction	<b>Monday — Friday</b>	<b>7 am to 6 pm</b>														
	Saturday	8 am to 1 pm														
	Sunday & Public	Nil														
Operation	Monday —	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	JJ Richards advised should a request be received, internal processes are in place such that the site manager will contact the Legal Team to formalize the request with relevant agencies.	Not triggered														

Condition	Comment	Compliance Status	Observation or Recommendation
affected residents as soon as possible, or within a reasonable period in the case of emergency.			
<b>Noise Mitigation</b> B19. The Applicant shall: <ul style="list-style-type: none"> <li>a) implement best practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the Development;</li> <li>b) minimise the noise impacts of the Development during adverse meteorological conditions;</li> <li>c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and</li> <li>d) regularly assess noise emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.</li> </ul>	Section 23 of the OEMP discusses Noise Management principles and processes and is supported by Attachment 38 which discusses Nuisance Noise Management including an Assessment process should a noise complaint be received. Section 27 of the OEMP addresses Traffic Management on-site.  A completed Site Checklist dated 30/4/2018 was observed and includes the task "Confirm there is not an unacceptable level of noise being emitted beyond the property boundary".  JJ Richards advised that no complaints of any nature have been received to date.	Compliant	
<b>Noise Criteria</b> B20. The Applicant shall ensure noise from the operation does not exceed the limits in Table 2 Below  <u><b>Table 2: Operational Noise Limits</b></u>	JJ Richards advised that their interpretation of this condition is that it is triggered if a complaint is received. No complaints of any nature have been received to date therefore noise monitoring has not occurred since commencement of operations.  Whilst MRA have no reason to believe that the Glendenning Liquid Waste Facility is non-compliant	Not verified	<i>Observation 6</i>  As part of any proposed future environmental monitoring program once the site is fully operational, it is suggested consideration be given to undertaking noise monitoring to

Condition			Comment	Compliance Status	Observation or Recommendation						
<table><tr><th>Receiver/location</th><th>Day/Evening/Night</th><th>Sleep disturb</th></tr><tr><td>Receptor groups 1 and 2*</td><td>36</td><td>46</td></tr></table> <p>*Refer to the plan in Appendix 4 for the location of residential receivers</p>			Receiver/location	Day/Evening/Night	Sleep disturb	Receptor groups 1 and 2*	36	46	with this requirement, sufficient verifiable evidence was not available at the time of the audit.		assess compliance against this criteria.
Receiver/location	Day/Evening/Night	Sleep disturb									
Receptor groups 1 and 2*	36	46									
<b>Noise Compliance Measurement</b>  B21. Noise monitoring shall be undertaken in response to valid complaints or at the request of the Secretary. Noise generated by the Development is to be measured in accordance with the relevant requirements and exemptions (including certain meteorological conditions) of the latest version of the NSW Industrial Noise Policy.			JJ Richards advised that no complaints of any nature have been received to date nor has the Secretary requested noise monitoring.	Not triggered							
<b>SOIL AND WATER Compliance</b>  B22. A Section 73 Compliance Certificate under the <i>Sydney Water Act 1994</i> must be obtained from Sydney Water prior to the commencement of operation.			A Section 73 Compliance Certificate under the <i>Sydney Water Act 1994</i> with approval date 31 May 2017 was observed.	Compliant							
B23. Prior to the discharge of any waste to sewer, the Applicant shall enter into a Trade Waste Agreement with Sydney Water.			Sydney Waste Corporation Consent to Discharge Industrial Trade Wastewater 39115.1.A. (Activity Grease Trap Waste Disposal) dated 03/04/2018 was observed.	Compliant							

Condition	Comment	Compliance Status	Observation or Recommendation
<b>Pollution of Waters</b>  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.	A Construction EMP dated 14 February 2016 has been implemented throughout the construction phase.  An Operational EMP (OEMP) version 1.3 dated November 2017 is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility. In particular, it is noted that Section 24 Spill Management and Section 25 Stormwater Management of the OEMP discuss control measures to minimise potential for the pollution of waters.	Compliant	
<b>Stormwater</b>  B25. The Applicant shall: <ul style="list-style-type: none"> <li>a) design, install and maintain the stormwater management system generally in accordance the EIS, RTS and as shown in Appendix 3, in consultation with Council;</li> <li>b) ensure that the system capacity has been designed in accordance with <i>Managing Urban Stormwater: Soils and Construction Vol. 1</i> (Landcom, 2004); and</li> <li>c) provide Council a maintenance schedule for the stormwater treatment measures prior to the commencement of construction; and</li> <li>d) provide Council a reuse hydraulic plan to manage all rainwater reuse on site</li> </ul>	<ul style="list-style-type: none"> <li>a) Stormwater on-site is managed generally in accordance with the Integrated Water Cycle Management Strategy (IWCMS) identified in the EIS and was observed to generally reflect the Stormwater Concept Plan in the Development Consent. An installation Certificate dated 30<sup>th</sup> November 2017 from Aabel Services Pty Ltd certifies stormwater drainage, sewer drainage and fire services works has been undertaken in accordance with relevant drawings, standards and codes.</li> <li>b) Section 11 of the IWCMS indicates the sediment and erosion control for the Development is addressed in accordance with the nominated reference;</li> <li>c) Attachment D within the IWCMS outlines the Inspection and Maintenance Manual for Water Quality Improvement Devices at the Glendenning facility. This document is dated February 2016 which is prior to the commencement of construction in April 2017;</li> <li>d) The following Reuse Hydraulic Plan Drawing No's. R1456-10-14, R1456-10-16, and R1456-10-17 were observed. Construction Certificate No. CC_17-00214 dated 21/3/17 issued by Blacktown City Council was also observed and included reference to the Reuse Hydraulic Plan Drawings listed above.</li> </ul>	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
B26. Prior to the issue of a final Occupation Certificate, the Applicant shall provide a Restriction to User and Positive Covenant under Section 88B of the <i>Conveyancing Act 1919</i> over the stormwater quality devices and rainwater tanks in accordance with the requirements of Council's <i>Engineering Guide for Development 2005</i> .	<p>The executed Positive Covenant document dated 16/10/2017 was observed.</p> <p>The executed Restriction on the Use of Land by a Prescribed Authority document dated 16/10/2017 was observed.</p> <p>The final Occupation Certificate 170052 dated 09/05/2018 issued by Greenfield Certifiers was observed and confirms the Positive Covenant/Restriction to User document were in place prior to this.</p>	Compliant	
<b>On-site Detention</b> B27. The Applicant shall design and construct any on-site stormwater detention system in accordance with condition A10, in consultation with Council.	<p>Engineering Construction Certificate Number CC-17-00214 issued by the Blacktown City Council dated 21/03/2017 was observed.</p> <p>The Blacktown City Council Final Site Inspection Report dated 16/02/2018 was observed with the comment "All works complete to Council satisfaction".</p>	Compliant	
B28. Prior to the issue of a final Occupation Certificate, the Applicant shall provide a Restriction to User and Positive Covenant under Section 88B of the <i>Conveyancing Act 1919</i> over the on-site detention system in accordance with the requirements of Council's <i>Engineering Guide for Development 2005</i> .	<p>The executed Positive Covenant document dated 16/10/2017 was observed.</p> <p>The executed Restriction on the Use of Land by a Prescribed Authority document dated 16/10/2017 was observed.</p> <p>The final Occupation Certificate 170052 dated 09/05/2018 issued by Greenfield Certifiers was observed and confirms the Positive Covenant/Restriction to User documents were in place prior to this.</p>	Compliant	
<b>Erosion and Sediment Control</b> B29. The Applicant shall implement erosion and sediment control measures on-site in accordance with <i>Managing Urban Storm</i>	A Construction EMP dated 14 February 2016 has been implemented during the construction phase. Section 4.2 of this document addresses erosion and sediment control.	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
<i>water: Soils and Construction Vol. 1 (Landcom, 2004).</i>	<p>An Operational EMP version 1.3 dated November 2017 is currently in place. Section 24 Spill Management and Section 25 Stormwater Management of the OEMP discuss control measures to minimise potential for the pollution of waters.</p> <p>The site is completely sealed (apart from landscaping around the perimeter) as such erosion and sediment release is not likely to be an issue of concern. SPEL stormwater quality improvement devices were observed on-site.</p> <p>Stormwater on-site is managed generally in accordance with the Integrated Water Cycle Management Strategy (IWCMS) identified in the EIS and was observed to reflect the Stormwater Concept Plan in the Development Consent.</p> <p>Section 11 of the IWCMS indicates the sediment and erosion control for the Development is addressed in accordance with the nominated reference.</p>		
<p><b>Bunding</b></p> <p>B30. The Applicant shall store all liquid wastes and materials including chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling Liquids: Environmental Protection Participant's Manual 2007</i>.</p>	<p>During the site inspection, all liquid wastes and materials were observed to be stored within bunded areas.</p> <p>The Used Oil Storage Area was still in the process of being commissioned at the time of the audit and, a portion of the bund wall around the used oil store was not completely sealed with an impervious product. JJ Richards advised this work will be complete prior to commissioning of the Used Oil Storage Area.</p> <p>Sealant products used include two (2) coats of epoxy coating Nitocote EP410 on both tank farms with Emerseal CR in the Organic Tank Farm and Thioflex 500 in the Used Oil Tank Farm saw joints.</p> <p>The Development project managers Duggan &amp; Hede Pty Ltd have provided written confirmation dated 10 May 2018 that the facility has been designed and</p>	Compliant	



Condition	Comment	Compliance Status	Observation or Recommendation
	constructed in accordance with the nominated references.		
<b>B31.</b> Prior to the commencement of operation, the Applicant shall ensure that: <ul style="list-style-type: none"> <li>a) the bunded areas are impervious to liquids handled or stored in the bunded area;</li> <li>b) the bund does not contain valves;</li> <li>c) all pipe work goes over the bund walls, not through them;</li> <li>d) house couplings for filling/ emptying containers/tanks are located in the bunded area; and</li> <li>e) the bund floor is graded to a blind sump located within the bunded area to facilitate the removal of liquids.</li> </ul>	<p>During the site inspection, all liquid wastes and materials were observed to be stored within bunded areas.</p> <p>The Development project managers Duggan &amp; Hede Pty Ltd have provided written confirmation dated 10 May 2018 that the facility has been designed and constructed in accordance with the nominated references.</p> <ul style="list-style-type: none"> <li>a) The Used Oil Storage Area was still in the process of being commissioned at the time of the audit and, a portion of the bund around the oil store was not completely sealed with an impervious product (2 coats of expoy coating Nitocote EP410 on both tank farms with Emerseal CR in the Organic Tank Farm and Thioflex 500 in the Used Oil Tank Farm saw joints);</li> <li>b) Bunds observed did not contain valves;</li> <li>c) Pipe work was observed to go over not through bund walls;</li> <li>d) House couplings were observed to be within bunded areas;</li> <li>e) A blind sump was observed within the bunded area.</li> </ul>	Compliant	
<b>TRAFFIC AND ACCESS</b>  <b>B32.</b> The Applicant shall ensure that: <ul style="list-style-type: none"> <li>a) a total of 26 car parking spaces, including one disabled car parking space are provided;</li> <li>b) a total of 14 truck parking spaces are</li> </ul>	<p>The final Occupation Certificate 170052 dated 09/05/2018 issued by Greenfield Certifiers was observed.</p> <p>An Operational EMP version 1.3 dated November 2017 is currently in place. Section 27 Traffic Management of the OEMP discusses driver and vehicle protocols, with further detail reflecting condition requirements outlined</p>	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
<p>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;</p> <p>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;</p> <p>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 <i>AUSTROADS Guide to Road Design</i>;</p> <p>e) the Development does not result in any vehicles parking or queuing on the public road network;</p> <p>f) all vehicles are wholly contained on site before being required to stop;</p> <p>g) all vehicles enter and leave the site in a forward direction;</p> <p>h) heavy vehicles do not leave the site via a right turn movement onto Power Street; and</p> <p>i) heavy vehicles access and egress the site between the hours of 4 am and 9 pm only, unless in accordance with Condition B20.</p>	in Attachment 47 Drivers Code of Conduct and Attachment 48 Parking Protocol.		
<b>Driver Code of Conduct</b> B33. Prior to the commencement of operation, the	An Operational EMP version 1.3 dated November 2017 is currently in place. Section 27 Traffic Management of the OEMP discusses driver and vehicle protocols, with	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
<p>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"> <li>a) minimise the impacts of the development on the local and regional road network;</li> <li>b) minimise conflicts with other road users; and</li> <li>c) ensure truck drivers use the specified routes.</li> </ul>	<p>further detail reflecting condition requirements outlined in Attachment 47 Drivers Code of Conduct.</p> <p>The Drivers Code of Conduct was prepared by JJ Richards and its inclusion in OEMP Version 1.3 dated November 2017 confirms the Code was prepared prior to the commencement of operation on 4 April 2018.</p> <p>JJ Richards advised site supervisors have been trained in the Drivers Code of Conduct) and will escort any drivers not trained to date. Training records for Daniel Lownds (03/05/2018) and Marc Lequesne (03/05/2018) were observed and included content on the Drivers Code of Conduct and the Heavy Vehicle Parking Protocol.</p> <p>JJ Richards advised that the training package will be updated and rolled out for all by the end of May 2018.</p>		
<p><b>FIRE MANAGEMENT</b></p> <p>B34. The Applicant shall:</p> <ul style="list-style-type: none"> <li>a) implement suitable measures to minimise the risk of fire on-site including but not limited to the recommendations in the EIS in consultation with Fire and Rescue NSW,</li> <li>b) extinguish any fires on-site promptly; and</li> <li>c) maintain adequate fire-fighting capacity on-site.</li> </ul>	<p>An Operational EMP version 1.3 dated November 2017 is currently in place. Section 14 Risk Management and associated Attachment 20 Risk Assessment identifies fire as a hazard and prevention/detection measures.</p> <p>Section 18 HSE Systems outlines procedures and equipment to maintain a safety of worked and/or the environment.</p> <p>Section 19 Emergency Planning and Management outlines emergency response processes including provision of an internal Fire and Emergency Training module for staff.</p> <p>Evidence of consultation with Fire and Rescue NSW in the form of emails and meeting minutes dated 28 February 2017.</p> <p>An installation Certificate dated 30<sup>th</sup> November 2017 from Aabel Services Pty Ltd certifies stormwater drainage, sewer drainage and fire services works has been undertaken in accordance with relevant drawings, standards and codes.</p>	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
<b>VISUAL AMENITY</b> <b>Landscaping</b> B35. 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.	JJ Richards advised that no changes were required by the Secretary and landscaping was implemented prior to commencement of operations as per the Landscape Concept Plan prepared by Jeremy Ferrier Architect dated June 2016.	Compliant	
<b>Lighting</b> B36. 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 <i>Australian Standard AS 4282 1997</i> .	Construction Certificate Number 170052 issued by the Greenfield Certifiers dated 04/04/2017 was observed and included reference to the Lighting Plan & Design Certificate SKE01 Rev C dated 07/02/2017.  The final Occupation Certificate 170052 dated 09/05/2018 issued by Greenfield Certifiers was observed.  JJ Richards advised that lighting is on timers to coincide with operating hours and have be positioned/directed downwards to minimise potential nuisance was observed.	Compliant	
<b>Signage</b> B37. 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.  <i>Note This condition does not apply to signage identified as exempt or complying Development in State Environmental Planning Policy (Exempt and Complying Development Codes) 2008.</i>	JJ Richards advised if new signage was required, processes would be put in place to consult with Council and comply with relevant standards.	Compliant	
<b>HERITAGE</b> B39. The Applicant shall cease all works on site in the event that any Aboriginal	JJ Richards advised that no items of cultural heritage items found during construction.	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
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> .			
<b>SECURITY</b> <b>B40.</b> The Applicant shall: <ul style="list-style-type: none"> <li>c) install and maintain a perimeter fence and security gates on the site; and</li> <li>d) ensure that the security gates on site are locked whenever the site is unattended.</li> </ul>	<p>An Operational EMP version 1.3 dated November 2017 is currently in place. Section 26 outlines Site Security control measures including those required in a) and b).</p> <p>A perimeter fence and security gates were observed to be installed on the site at the time of inspection.</p>	Compliant	<p><i>Observation 7</i></p> <p>As part of any proposed future updates to the OEMP, suggest consideration be given to including perimeter fence and security gate checks into the Site Checklist - Glendenning.</p>

Condition	Comment	Compliance Status	Observation or Recommendation
<b>PART C – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING</b>			
<b>ENVIRONMENTAL MANAGEMENT</b> <b>Construction Environmental Cons</b> C1. 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: <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced person(s);</li> <li>b) describe all activities to be undertaken on the site during construction, including a clear indication of construction stages;</li> <li>c) identify the statutory approvals that apply to the Development;</li> <li>d) outline all environmental management practices and procedures to be followed during construction (e.g. construction traffic management, dust management and construction noise and vibration management), including all reasonable and feasible mitigation measures to protect the amenity of the surrounding environment;</li> <li>e) detail how the environmental performance of construction will be monitored, and what actions will be taken to address identified adverse environmental impacts;</li> <li>f) describe the roles and responsibilities for all relevant</li> </ul>	Following Development Consent approval on 11 January 2017, the facility was constructed between April 2017 and April 2018. A Construction Environmental Management Plan (CEMP) dated 14 February 2016 has been implemented throughout the construction phase. JJ Richards advised the CEMP was approved by the EPA on 2 March 2017. Requirements of this condition are addressed as follows: <ul style="list-style-type: none"> <li>a) The CEMP was prepared by Duggan &amp; Hede Pty Ltd who are suitably qualified and experienced in waste management project development;</li> <li>b) Section 1.2 describes site activities and possible impacts and the construction phase;</li> <li>c) Section 1.3 outlines statutory obligations and approvals;</li> <li>d) Section 2 outlines environmental management responsibilities and overarching processes, Section 4 documents Management Plans for environmental matters;</li> <li>e) Section 3 outlines Checking processes and Corrective Action;</li> <li>f) Section 2 outlines environmental management responsibilities including the organisational structure for the head contractor for the development construction;</li> <li>g) Section 3.6 outlines Community Consultation. Section 3.3 outlines the process for Complaints Handling;</li> </ul>	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
<p>employees involved in construction,</p> <p>g) include arrangements for community consultation and complaints handling procedures during construction; and</p> <p>h) consolidate the construction related parts of any management plans and monitoring programs required in the conditions of this consent</p>	<p>h) Section 3 Checking and Corrective Actions and Section 4 Management Plans.</p>		
<p>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.</p>	<p>A Construction Environmental Management Plan (CEMP) dated 14 February 2016 has been implemented throughout the construction phase.</p> <p>The Development project managers Duggan &amp; Hede Pty Ltd have provided written confirmation dated 10 May 2018 that they supervised construction of the facility and construction practices were in accordance with the sites' CEMP.</p>	Compliant	
<p><b>Operational Environmental Management Plan</b></p> <p>C3. The Applicant shall prepare an Operational Environmental Management Plan for the Development to the satisfaction of the Secretary. This strategy must:</p> <p>g) be prepared by a suitably qualified and experienced person(s);</p> <p>h) provide a strategic framework for environmental management of the Development;</p> <p>i) identify the statutory approvals that apply to the Development;</p> <p>j) describe the role, responsibility,</p>	<p>Following Development Consent approval on 11 January 2017, the facility was constructed between April 2017 and April 2018.</p> <p>An Operational Environmental Management Plan (OEMP) Version 1.3 dated November 2017 is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility.</p> <p>Documentation from the Secretary approving the OEMP dated 22/11/2017 was observed.</p> <p>Requirements of this condition are addressed as follows:</p> <p>g) The OEMP was prepared by JJ Richards who are suitably qualified and experienced in waste management;</p>	Compliant	<p><i>Observation 8</i></p> <p>As part of any proposed future updates to the OEMP, suggest consideration be given to including dispute resolution procedures into Attachment 36 General Feedback or other relevant section of the OEMP.</p>



Condition	Comment	Compliance Status	Observation or Recommendation
<p>authority and accountability of all key personnel involved in the environmental management of the Development;</p> <p>k) 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</p> <p>l) describe the procedures that would be implemented to:</p> <p>(vi) keep the local community and relevant agencies informed about the operation and environmental performance of the Development;</p> <p>(vii) receive, handle, respond to, and record complaints;</p> <p>(viii) resolve any disputes that may arise;</p> <p>(ix) respond to any non-compliance; and</p> <p>(x) respond to emergencies.</p>	<p>h) Entire OEMP, but in particular Section 1 Scope, Section 2 OEMP Context, Section 4 Integrated Management Systems and Section 6 Corporate Policies outline the strategic framework for environmental management of the Development;</p> <p>i) Section 3 outlines Relevant Statutory Requirements;</p> <p>j) Section 5 outlines Roles, Responsibilities and Organisational Chart;</p> <p>k) Section 11 outlines Performance Monitoring, Section 27 Traffic Management and Attachment 48 Parking Protocol addresses out of hours heavy vehicle parking;</p> <p>l) Section 7 outlines Consultation and Communication, Section 21 outlines Complaints Management and Attachment 36 General Feedback (although dispute resolution doesn't appear to be clearly addressed), Section 12 Corrective Action System, Section 19 Emergency Planning and Management.</p>		
<p>C4. The Applicant shall carry out the Development in accordance with the Operational Environmental Management Plan approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary.</p>	<p>Based on documentation observed and observations during the site inspection, the Development is being carried out generally in accordance with the approved OEMP.</p> <p>It is noted that continuous improvement processes are in place and a <i>Table of Amendments – OEMP</i> document was observed outlining proposed amendments for Secretary Approval. The recent commissioning of the Organics Building at the facility has resulted in some refinement of processes/forms within the approved OEMP.</p>	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
<b>Management Plan Requirements</b>  C5. The Applicant shall ensure that the environmental management plans/ strategies required under this consent are prepared in accordance with any relevant guidelines and include: <ul style="list-style-type: none"> <li>a) detailed baseline data;</li> <li>b) a description of:               <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>(iii) any relevant limits or performance measures/criteria;</li> <li>(iv) 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</li> <li>(v) the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</li> </ul> </li> <li>c) a program to monitor and report on the:               <ul style="list-style-type: none"> <li>(i) impacts and environmental performance of the Development;</li> </ul> </li> </ul>	<p>An Operational Environmental Management Plan (OEMP) Version 1.3 dated November 2017 is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility. The OEMP contains more specific management plans as required (e.g. Odour Management Plan).</p> <p>Requirements of this condition are addressed as follows:</p> <ul style="list-style-type: none"> <li>a) JJ Richards has advised that the OEMP has been developed under the supervision of the JJR's National Management – Environment &amp; Regulatory Affairs and based on the baseline data and technical reports prepared to support the Development Application;</li> <li>b) Section 3 outlines relevant statutory requirements, limits or performance criteria and control measures are outlined where appropriate in issue specific sections of the OEMP;</li> <li>c) Section 11 Performance Monitoring, Section 12 Corrective Action System, Section 13 Documentation and Records Management, Section 14 Risk Management, Section 19 Emergency Planning and Management, Section 20 Incident Management, Section 28 Monitoring and Review;</li> <li>d) Section 20 Incident Management, Section 21 Complaints Management, Section 12 Corrective Action System, Section 28 Monitoring and Review.</li> </ul>	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
(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: (i) incidents; (ii) complaints; (iii) non-compliances with statutory requirements; (iv) exceedances of the impact assessment criteria and/or performance criteria; and (v) a protocol for periodic review of the plan.			
C10. The Secretary may waive some of the requirements in Condition C5 if they are unnecessary or unwarranted for particular management plans/strategies.	JJ Richards advised that there has been no waiving of any requirements in Condition C5 to date.	Not triggered	
<b>REPORTING AND AUDIT</b> <b>Incident Reporting</b> C11. The Applicant shall notify, at the earliest	JJ Richards advised that there have been no complaints received or incidents to date. An Operational Environmental Management Plan (OEMP) Version 1.3 dated November 2017 is currently	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
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.	in place and Section 20 outlines Incident Management processes. Review of Section 20 indicates internal reporting of all incidents to the Legal Team within 24 hours. The Legal Team are then responsible for notification to external authorities.		
<b>Regular Reporting</b>  C12. 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.	<p>The Operational Environmental Management Plan (OEMP) Version 1.3 dated November 2017 is an approved plan currently in place and Section 28 outlines Monitoring and Review processes. Section 28.5 indicates that details of the Annual Review of Environmental Performance will be made available to the public via JJR's website.</p> <p>The annual review of environmental performance was undertaken in February 2018 and documented in the 2018 Annual Environmental Management Report. However, no details of this annual review were found on the JJ Richards website as required by section 28.5 of the OEMP.</p>	Administrative non-compliance	<i>Recommendation 1</i>  It is recommended JJ Richards make details of the 2018 Annual Environmental Management Report public via JJ Richards website and/or consider review of Section 28.5 and the need for inclusion of this requirement.
<b>Independent Environmental Audit</b>  C13. 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: <ul style="list-style-type: none"> <li>a) be conducted by a suitably</li> </ul>	<p>Following Development Consent approval on 11 January 2017, the facility was constructed between April 2017 and April 2018. The storage and treatment of grease trap waste and food waste was recently commissioned on 4 April 2018. This commencement date coincides with the issue of the EPA Licence 21053 on 4 April 2018.</p> <p>The site was not operational within 1 year of the</p>	Administrative non-compliance	<i>Recommendation 2</i>  It is recommended JJ Richards ensure that future IEA's are undertaken in timeframes nominated in Condition C9 and suggest the Annual Planner for the site be updated to include the IEA as task at 3 year intervals.

Condition	Comment	Compliance Status	Observation or Recommendation
<p>qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>b) be led by a suitably qualified auditor, and include experts in fields specified by the Secretary;</p> <p>c) include consultation with the relevant agencies;</p> <p>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;</p> <p>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);</p> <p>f) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and</p> <p>g) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.</p>	<p>consent, as such the Independent Environmental Audit (IEA) was not undertaken. Correspondence dated 22 February 2018 from the Secretary in relation to non-compliance with Conditions C9 was observed. It is noted the Department requested progress be made to undertake the IEA and that no further compliance action would be taken in this instance.</p> <p>The audit undertaken by Mark Rigby &amp; Associates (MRA) on 9<sup>th</sup> May 2018 represents the first IEA conducted on the Development, however it was not conducted within 1 year from the date of consent.</p> <p>Requirements of this condition are addressed as follows:</p> <ul style="list-style-type: none"> <li>a) MRA were approved by the Secretary as suitably qualified, experienced and independent persons on 19<sup>th</sup> February 2018;</li> <li>b) The MRA audit team consists of Exemplar certified Principal and Lead auditors with expertise in waste management industries;</li> <li>c) Nominated contacts within relevant agencies were consulted via an email sent on 27/04/2018 prior to the site inspection undertaken on 9/05/2018;</li> <li>d) A full odour audit was not undertaken as part of the IEA. This is being commissioned separately as outlined in Condition B14;</li> <li>e) The MRA IEA was conducted against conditions within Development Consent SSD 6767 and EPA Licence No. 21053;</li> <li>f) As per e);</li> <li>g) As per e). Recommendations have been provided throughout the IEA report as considered appropriate by MRA.</li> </ul>		
C10. Within three months of commissioning this audit, or as otherwise agreed by the Secretary, the	JJ Richards advised their intention to submit the IEA report and response to any recommendations within	Not triggered	

Condition	Comment	Compliance Status	Observation or Recommendation
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 required timeframe. A task reminder has been created in the Legal Team calendar for the 9 <sup>th</sup> August 2018.		
<b>Annual Review</b> C11. 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: <ul style="list-style-type: none"> <li>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;</li> <li>b) include a report on the previous calendar year's water treatment and non-potable water use;</li> <li>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:               <ul style="list-style-type: none"> <li>(v) the relevant statutory requirements, limits or performance measures/criteria;</li> <li>(vi) requirements of any plan or program required under this consent;</li> <li>(vii) the monitoring results of previous years; and</li> <li>(viii) the relevant predictions in the EIS;</li> </ul> </li> <li>d) identify any non-compliance over the</li> </ul>	<p>Following Development Consent approval on 11 January 2017, the facility was constructed between April 2017 and April 2018. The storage and treatment of grease trap waste and food waste was recently commissioned on 4 April 2018. This commencement date coincides with the issue of the EPA Licence 21053 on 4 April 2018.</p> <p>The site was not operational within 1 year of the Development Consent, as such the Annual Review was not undertaken. Correspondence dated 22 February 2018 from the Secretary in relation to non-compliance with Conditions C11 was observed. It is also noted that the Department acknowledged receipt of the Annual Environmental Management Report on 16 February 2018.</p> <p>The 2018 Annual Environmental Management Report was undertaken by Duggan &amp; Hede and represents the first Annual Review, however it was not conducted within 1 year from the date of consent.</p> <p>The 2018 Annual Environmental Management Report was reviewed and addressed the requirements of items a) to g) taking into account that the facility was not operational in February 2018.</p>	Administrative non-compliance	<b>Recommendation 3</b> It is recommended JJ Richards ensure that future Annual Reviews are undertaken in timeframes nominated in Condition C11 and suggest the Annual Planner for the site be updated to include the Annual Review as task at 1 year intervals.

Condition	Comment	Compliance Status	Observation or Recommendation
<p>last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>e) identify any trends in the monitoring data over the life of the Development;</p> <p>f) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and</p> <p>g) describe what measures will be implemented over the next year to improve the environmental performance of the Development.</p>			
<p><b>Revision of Strategies, Plans and Programs</b></p> <p>C12. Within 3 months of the submission of an:</p> <p>e) annual review under Condition C11 above;</p> <p>f) incident report under Condition C7 above;</p> <p>g) audit under Condition C9 above; or</p> <p>h) any modification to this consent, the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent.</p> <p><i>Note. This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.</i></p>	<p>Correspondence dated 22 February 2018 from the Secretary acknowledged receipt of the Annual Environmental Management Report on 16 February 2018. There are no proposed remedial actions required as a result of the annual review.</p>	Not triggered	<p><i>Observation 9</i></p> <p>As part of any proposed future updates to the OEMP, suggest consideration be given to inclusion in Section 28.6 to maintain a record of Applicant review prompted by items a) to d) even if the outcome is no proposed changes required.</p>



Condition	Comment	Compliance Status	Observation or Recommendation
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.	<p>An Operational Environmental Management Plan (OEMP) Version 1.3 dated November 2017 is currently in place and Section 28 outlines Monitoring and Review of the OEMP as per Condition C11.</p> <p>Section 13 Documentation and Records Management and Attachment 18 Document and Record Management outline document review processes.</p> <p>JJ Richards also have a comprehensive training process in place which is outlined in Section 8 Induction, Competency and Training.</p>	Compliant	

## ENVIRONMENT PROTECTION LICENCE - 21053

Condition	Comment	Compliance Status	Observation or Recommendation												
PART 1 – ADMINISTRATIVE CONDITIONS															
<div><b>A1 What the licence authorises and regulates</b>  A1.1 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.  Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</div> <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><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>Resource recovery</td><td>Recovery of waste oil</td><td>&gt; 1000 - 20000 T annual recovery 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></table>	Scheduled Activity	Fee Based Activity	Scale	Waste processing (non-thermal treatment)	Non-thermal treatment of liquid waste	Any annual processing capacity	Resource recovery	Recovery of waste oil	> 1000 - 20000 T annual recovery capacity	Waste storage	Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	Any listed waste type stored	<div>The storage and treatment of grease trap waste and food waste was recently commissioned on 4 April 2018. This commencement date coincides with the issue of the EPA Licence No. 21053 on 4 April 2018. Storage and treatment of used oil and industrial oily water has not yet been commissioned.  Condition L2.1 currently limits the site to acceptance of liquid food waste and grease trap waste. An amendment/variation to EPA Licence No. 21053 will be required prior to commencement of the Used Oil Storage Area at the Glendenning facility.  Condition L2.2 currently limits the amount of waste that can be stored to 412 tonnes. A Waste Inventory Spreadsheet (WIS) system is in place at the moment to record the amount of waste received and stored. This will be automated with the weighbridge system within the month. The standard conversion rate used is 1T:1KL.  The WIS was observed and showed that between 04/04/2018 and 08/05/2018 a total of 474,600 litres/474.6 tonnes of grease trap waste had been received. Taking into account sludge dispatch that has occurred during this same period, the WIS indicates less than 412 tonnes of waste has been stored on site. No used oil/industrial oily water has been received to date.</div>	Compliant	<div>Observation 10  It is suggested JJ Richards seek amendment to EPA Licence No. 21053 prior to commencement of the Used Oil Storage Area. Condition L2.2 may also need review should more than 412 tonnes need to be stored.</div>
Scheduled Activity	Fee Based Activity	Scale													
Waste processing (non-thermal treatment)	Non-thermal treatment of liquid waste	Any annual processing capacity													
Resource recovery	Recovery of waste oil	> 1000 - 20000 T annual recovery capacity													
Waste storage	Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	Any listed waste type stored													
<b>A2 Premises or plant to which this licence applies</b>	The IEA was undertaken at 14 Rayben Street, Glendenning, being the premises to which EPA Licence No. 21053 applies.	Compliant													

Condition	Comment	Compliance Status	Observation or Recommendation					
<p>A2.1 The licence applies to the following premises:</p> <table><tr><td>Premises Details</td></tr><tr><td>J.J. RICHARDS &amp; SONS PTY LTD</td></tr><tr><td>14 RAYBEN STREET</td></tr><tr><td>GLENDENNING</td></tr><tr><td>NSW 2761</td></tr></table>	Premises Details	J.J. RICHARDS & SONS PTY LTD	14 RAYBEN STREET	GLENDENNING	NSW 2761			
Premises Details								
J.J. RICHARDS & SONS PTY LTD								
14 RAYBEN STREET								
GLENDENNING								
NSW 2761								
<p><b>A3 Information supplied to the EPA</b></p> <p>A3.1 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> <p>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</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	<p>A Construction EMP dated 14 February 2016 has been implemented throughout the construction phase.</p> <p>The Development project managers Duggan &amp; Hede Pty Ltd have provided written confirmation dated 10 May 2018 that they supervised construction of the facility and construction practices were in accordance with the sites' CEMP.</p> <p>An Operational EMP (OEMP) version 1.3 dated November 2017 is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility.</p> <p>Both the CEMP and OEMP were prepared based on the supporting information and technical reports prepared for Development Application SSD 6767 and EPA Licence No. 21053.</p> <p>Based on documentation observed and observations during the site inspection, the Development is being carried out generally in accordance with the proposal contained in the licence application.</p>	Compliant						
PART 2 – DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND								
<p><b>P1 Location of monitoring/discharge points and areas</b></p> <p>P1.1 The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or</p>	<p>JJ Richards advised monitoring will be conducted in accordance with this condition and that they are in the process of engaging Air Noise Environment to undertake a Post Commissioning Odour Audit. The scope of works for the Odour Audit includes reference to Condition B14 of the Development</p>	Compliant	<p><i>Observation 11</i></p> <p>As part of any proposed future updates to the OEMP and Odour</p>					

Condition	Comment	Compliance Status	Observation or Recommendation												
<p>the setting of limits for the emission of pollutants to the air from the point.</p> <table><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><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 'R1456-90-08 (CF_WS LOCATION)' DOC18/178813</td></tr></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 'R1456-90-08 (CF_WS LOCATION)' DOC18/178813	<p>Consent and also Condition E4.2 of the EPA Licence No. 21053.</p> <p>Drawing No. R1456-10-02 “Proposed Site Plan” was provided as the map referenced in the Location Description section of the Air table in Condition P1.1. Whilst the general location for sampling is clear, the exact location of the monitoring points is unclear from this figure.</p>		<p>Management Plan, suggest consideration be given to inclusion of a figure clearly identifying air emission monitoring/discharge points determined following the Post Commissioning Odour Audit to the undertaken in the near future.</p>
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 'R1456-90-08 (CF_WS LOCATION)' DOC18/178813												
<p>P1.2 The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.</p>	<p>Email correspondence dated 9 May 2018 from the EPA confirms there are no utilisation areas for this licence and hence no table. This is a standard condition that is on the licence.</p>	Note													
<p>P1.3 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><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><tr><td>2</td><td>Meteorological Station</td><td>Location as shown on site map in attachment to email titled 'R1456-90-08 (CF_WS LOCATION)' DOC18/178813</td></tr></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 'R1456-90-08 (CF_WS LOCATION)' DOC18/178813	<p>Drawing No. R1456-10-02 “Proposed Site Plan” was provided as the map referenced in the Location Description section of the Noise/Weather table in Condition P1.3.</p> <p>The meteorological station was observed to be positioned in the location identified on Drawing No. R1456-10-02.</p>	Compliant				
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 'R1456-90-08 (CF_WS LOCATION)' DOC18/178813													
PART 3 – LIMIT CONDITIONS															
<p><b>L1 Pollution of waters</b></p> <p>L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.</p>	<p>A Construction EMP dated 14 February 2016 has been implemented throughout the construction phase.</p> <p>An Operational EMP (OEMP) version 1.3 dated November 2017 is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility. In particular, it is noted that Section 24 Spill Management and Section 25 Stormwater Management of the OEMP discuss control measures to minimise potential for the pollution of waters.</p>	Compliant													

Condition	Comment	Compliance Status	Observation or Recommendation																									
<p><b>L2 Waste</b></p> <p>L2.1 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.</p> <p>This condition does not limit any other conditions in this licence.</p> <table><tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr><tr><td>K120</td><td>Liquid Food Waste</td><td></td><td>Waste processing (non-thermal treatment)</td><td></td></tr><tr><td></td><td></td><td></td><td>Waste storage</td><td></td></tr><tr><td>K110</td><td>Grease trap waste</td><td></td><td>Waste processing (non-thermal treatment)</td><td></td></tr><tr><td></td><td></td><td></td><td>Waste storage</td><td></td></tr></table>	Code	Waste	Description	Activity	Other Limits	K120	Liquid Food Waste		Waste processing (non-thermal treatment)					Waste storage		K110	Grease trap waste		Waste processing (non-thermal treatment)					Waste storage		<p>As per Development Consent Condition A6, permitted wastes under DA SSD 6767 include grease trap waste (K110), Liquid food waste (K120), waste mineral oils (J100) and oil/hydrocarbons mixtures/emulsions in water (J120). At present the EPA Licence No. 21053 Condition L2.1 only allows acceptance of grease trap waste and liquid food waste at the facility. JJ Richards advised only grease trap waste is currently accepted and once that process is bedded down, pulped liquid food waste covered by K120 will start coming to the site within the next fortnight.</p> <p>The OEMP Section 29 Waste Monitoring Program outlines the process for monitoring the quantity, type and source of waste of waste received and outputs produced on site. The Waste Inventory Spreadsheet currently in place was observed and indicates only grease trap waste has been received to date.</p> <p>JJ Richards also have a comprehensive training process in place and Training Records for three (3) staff were observed being Ben Martis (11-12/04/2018), Daniel Lownds (03/05/2018) and Marc Lequesne (03/05/2018). Topics covered as noted on these training forms included Waste Monitoring Program including waste acceptance, receipt and dispatch forms.</p>	Compliant	<p><i>Observation 12</i></p> <p>It is suggested JJ Richards seek amendment to EPA Licence No. 21053 prior to commencement of the Used Oil Storage Area. Condition L2.2 may also need review should more than 412 tonnes need to be stored.</p>
Code	Waste	Description	Activity	Other Limits																								
K120	Liquid Food Waste		Waste processing (non-thermal treatment)																									
			Waste storage																									
K110	Grease trap waste		Waste processing (non-thermal treatment)																									
			Waste storage																									
<p>L2.2 The quantity of waste stored at any one time at the premises must not exceed 412 tonnes.</p>	<p>A Waste Inventory Spreadsheet (WIS) system is in place at the moment to record the amount of waste received and stored. This will be automated with the weighbridge system within the month. Standard conversion rate used is 1T:1KL. The WIS was observed and showed that between 04/04/2018 and 08/05/2018 a total of 474,600 litres/474.6 tonnes of grease trap waste had been received. Taking into account sludge dispatch that has occurred during this same period, the WIS indicates less than 412 tonnes of waste has been stored on site at any one time. No used oil/industrial oily water has been received to date.</p> <p>The WIS also has an in-built warning mechanism such that when the number is greater than 390,000 the cell turns red to</p>	Compliant	<p><i>Observation 13</i></p> <p>It is suggested JJ Richards seek amendment to EPA Licence No. 21053 prior to commencement of the Used Oil Storage Area. Condition L2.2 may also need review should more than 412 tonnes need to be stored.</p>																									

Condition	Comment	Compliance Status	Observation or Recommendation
	warn they are close to the 412 tonne limit.		
<b>L3 Potentially Offensive Odour</b> L3.1 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> .  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.	No offensive odour observed during the site inspection. JJ Richards advised that no complaints of any nature have been received to date.  An Operational EMP version 1.3 dated November 2017 is currently in place. Section 22 addresses air management which primarily focuses on odour management procedures and is supported by Attachment 37 provides a more detailed Odour Management Plan (OMP). Odour monitoring requirements are captured within the OMP.  Section 28 of the OEMP Monitoring and Review also identifies the Odour Audit requirement.	Compliant	
<b>PART 4 – OPERATING CONDITIONS</b>			
<b>O1 Activities must be carried out in a competent manner</b> O1.1 Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	An Operational EMP (OEMP) version 1.3 dated November 2017 is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility.  Section 29 of the OEMP documents the Waste Monitoring Program for the Development. The WMP addresses training, waste acceptance criteria, volume restrictions, processes for waste receipt, dispatch, tracking and transport requirements.  Section 30 of the OEMP documents Operational Procedures outlining procedures for waste acceptance, waste oil handling, oily water receipt, grease trap waste handling, liquid food waste, non-compliant load procedures and a daily site checklist.  JJ Richards also have a comprehensive training process in place and Training Records for three (3) staff were observed being Ben Martis (11-12/04/2018), Daniel Lownds (03/05/2018) and Marc Lequesne (03/05/2018). Topics covered as noted on	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
	these training forms included Waste Monitoring Program including waste acceptance, receipt and dispatch forms.		
<b>O2 Maintenance of plant and equipment</b> O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity: <ul style="list-style-type: none"> <li>c) must be maintained in a proper and efficient condition; and</li> <li>d) must be operated in a proper and efficient manner.</li> </ul>	<p>Section 17 of the OEMP outlines Plant and Equipment Maintenance and Repair procedures and checklists to ensure in-situ plant, mobile plant, equipment and vehicles are inspected and maintained. Checklists referred to include:</p> <ul style="list-style-type: none"> <li>• Weekly Maintenance Checklist (workshop);</li> <li>• Monthly Maintenance Checklist (workshop);</li> <li>• Daily Pre-Trip and End of Day Checklists;</li> <li>• Vehicle and Plant Spot Checklist;</li> <li>• Mobile Plant and Combustion Equipment; and</li> <li>• Pre-Start Check processes are in place.</li> </ul> <p>JJ Richards advised that not all of the above referenced checklists are relevant to the Glendenning Liquid Waste Facility and some relate more so to other aspects of JJ Richards operations. Amendments to Section 17 of the OEMP are currently being prepared for Secretary approval and include deletion of the Weekly and Monthly Checklists.</p> <p>The following checklists are currently being used in relation to the Glendenning Liquid Waste Facility and will be incorporated into a future amendment of the OEMP:</p> <ul style="list-style-type: none"> <li>• FRM-SYD-XXX Site Checklist – Glendenning;</li> <li>• Daily Odour Checklist.</li> </ul> <p>Completed examples of the above checklists were observed during the audit. (Site checklist dated 30/04/2018 and Daily Odour Checklist dated 23/04/2018). On review of the Site Checklist, it is presumed the checklist relates to the whole site, but the terminology used could be interpreted to relate only to the Organics Building.</p> <p>A Table of Amendments – OEMP document was provided and demonstrates proposed amendments including deletion of Weekly Maintenance Checklist (workshop) and Monthly Maintenance Checklist (workshop).</p> <p>JJ Richards also have a comprehensive training process in place and Training Records for three (3) staff were observed</p>	Compliant	<p><i>Observation 14</i></p> <p>As per Observation 2, it is suggested that JJ Richards review Section 17 of the OEMP and update to reflect relevant checklists. Consideration could also be given to updating terminology to reflect tasks in both the Organics Building and Used Oil Storage Building when both are operational to clearly identify what is required in each area.</p>



Condition	Comment	Compliance Status	Observation or Recommendation
	being Ben Martis (11-12/04/2018), Daniel Lownds (03/05/2018) and Marc Lequesne (03/05/2018).		
<b>O3 Emergency response</b>  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 Protection of the Environment Operations (POEO) Act.	JJ Richards advised that a PIRMP is currently being prepared and will be submitted within the required timeframe. The Draft PRIMP Version 2 January 2018 addressing Glendenning Liquid Waste Facility, Seven Hills Liquid Treatment Facility & St Mary Recycling Facility was observed.	Not triggered	
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.	As per Condition O3.1, this condition is not triggered as yet.	Not triggered	
<b>O4 Processes and management</b>  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.	Section 30 of the OEMP Operational Procedures outlines procedures for waste acceptance, waste oil handling, oily water receipt, grease trap waste handling, liquid food waste, non-compliant load procedures and a daily site checklist. This includes the requirement for load handling to be carried out within bunded and covered areas only.	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.	No spillage of material was observed during the site inspection.  Section 24 of the OEMP Spill Management outlines the range of controls implemented to address the risk of spills. This section is supported by Attachment 39 Spill Management within the Site Based Management Plan framework. Attachment 40 Emergency Procedure Guide also provides a procedure flowchart for Spills (Liquid & Solid). Fire Emergency Management Module – Spill kit content.	Compliant	



Condition	Comment	Compliance Status	Observation or Recommendation
O4.3 All food wastes (waste code K110 and K120) on site must be stored in sealed tanks vented to the activated carbon filter.	Food waste tanks on-site were observed to be vented to the activated carbon filter.	Compliant	
O4.4 The Dissolved Air Flotation Unit must be contained in a sealed room vented to the activated carbon filter.	The Dissolved Air Flotation Unit was observed to be vented to the activated carbon filter.	Compliant	
<b>O5 Waste management</b> O5.1 The licensee must ensure that any liquid and/or non liquid waste generated and/or stored ad/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 Waste Classification Guidelines as in force from time to time.	Section 29 of the OEMP documents the Waste Monitoring Program for the Development. The WMP addresses training, waste acceptance criteria, volume restrictions, processes for waste receipt, dispatch, tracking and transport requirements. This section is supported by Attachment 44 Waste Transport Manual which outlines classification of waste. Attachment 42 Daily Organic Waste Receipt form is being updated to allow for delineation of waste types.	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"> <li>a) by a waste transporter authorised to transport such waste; and</li> <li>b) to a place that can lawfully accept that waste.</li> </ul>	Section 29 of the OEMP documents the Waste Monitoring Program for the Development. The WMP addresses training, waste acceptance criteria, volume restrictions, and processes for waste receipt, dispatch, tracking and transport requirements. Section 9 of the OEMP outlines supplier and subcontractor management and Attachment 12 outlines the supplier/subcontractor approval processes. At present, there are approximately six (6) JJ Richards trucks coming the Glendenning Liquid Waste Facility. Veolia are expected to start bringing material to Glendenning in the future. Supplier Subcontractor Registration documentation was observed for Veolia Environmental Services including EPA approvals trackable waste transport, waste storage and processing at Port Botany Resource Recovery Facility and waste processing and disposal at Horsley Park Waste Management Facility.	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
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.	JJ Richards Engineering Pty Ltd provided documentation dated 24/4/2018 confirming installation and function testing of high/low alarms and pumps for organics receipt tanks, treated waste tanks, the water balance tank and the lime tank. JJ Richards advised valves are operated manually at this point. All tanks are within bunded areas.	Compliant	
<b>PART 5 – MONITORING AND RECORDING CONDITIONS</b>			
<b>M1 Monitoring records</b>  M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	JJ Richards advised no monitoring has been conducted to date.  Section 28 of the OEMP outlines Monitoring and Review processes in place, including noise and odour monitoring. Section 13 of the OEMP outlines Documentation and Records Management processes which link with Attachment 18 which outlines the Corporate Document Management Process.	Compliant	
<b>M1.2 All records required to be kept by this licence must be:</b>  a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	JJ Richards advised that results of all monitoring requirements prescribed in this licence are recorded and kept in accordance with approval conditions.  Section 13 of the OEMP outlines Documentation and Records Management processes which link with Corporate Document G2 Records Management which prescribes processes for record retention. A copy of the SBMP 1.06-02 Form Retention, Archiving and Destruction Register was observed.	Compliant	
M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:  a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and	JJ Richards advised no monitoring has been conducted to date.  JJ Richards advised that results of all monitoring requirements prescribed in this licence are recorded and kept in accordance with approval conditions.  Section 13 of the OEMP outlines Documentation and Records Management processes which link with Corporate Document	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation																				
d) the name of the person who collected the sample.	G2 Records Management which prescribes processes for record retention.																						
<b>M2 Requirement To Monitor Concentration Of Pollutants Discharged</b>  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:	Section 22 of the OEMP outlines Air Management principles which are supported a more detailed the Odour Management Plan (OMP) in Attachment 37 provides. This OMP outlines odour sources and sampling methodology.  The storage and treatment of grease trap waste and food waste was recently commissioned on 4 April 2018. This commencement date coincides with the issue of the EPA Licence 21053 on 4 April 2018. A Post Commissioning Odour Audit is required by Condition E4.2 within six (6) months of the issue of the EPA Licence (i.e. not yet elapsed).  JJ Richards advised that they are in the process of engaging Air Noise Environment to undertake a post-commissioning Odour Audit. The scope of works for the Odour Audit includes reference to the Condition B14 and also Condition E4.2 of the EPA Licence.	Not triggered																					
M2.2 Air Monitoring Requirements  <b>Point 1</b>  <table border="1"> <thead> <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>	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	Note for information purposes.	Note	
Pollutant	Units of measure	Frequency	Sampling Method																				
Odour	odour units	Special Frequency 1	OM-7																				
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Volumetric flowrate	cubic metres per second	Special Frequency 1	TM-2																				
M2.3 Special Frequency 1 refers to once off Post Commissioning Monitoring.	Note for information purposes.	Note																					
M2.4 Selection of sampling position for Point 1 must comply with the sampling method TM-1.	Note for information purposes.	Note																					
<b>M3 Testing methods - concentration limits</b>  M3.1 Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done	Section 22 of the OEMP outlines Air Management principles which are supported a more detailed the Odour Management Plan (OMP) in Attachment 37 provides. This OMP outlines	Not triggered																					

Condition	Comment	Compliance Status	Observation or Recommendation																																								
<p>in accordance with:</p> <p>a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or</p> <p>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</p> <p>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> <p>Note: The <i>Protection of the Environment Operations (Clean Air) Regulation 2010</i> requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</p>	<p>odour sources and sampling methodology.</p> <p>The storage and treatment of grease trap waste and food waste was recently commissioned on 4 April 2018. This commencement date coincides with the issue of the EPA Licence 21053 on 4 April 2018. A Post Commissioning Odour Audit is required by Condition E4.2 within six (6) months of the issue of the EPA Licence (i.e. not yet elapsed).</p> <p>JJ Richards advised that they are in the process of engaging Air Noise Environment to undertake a post-commissioning Odour Audit. The scope of works for the Odour Audit includes reference to the Condition B14 and also Condition E4.2 of the EPA Licence.</p>																																										
<p><b>M4 Weather monitoring</b></p> <p>M4.1 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> <p><b>Point 2</b></p> <table><tr><th>Parameter</th><th>Sampling method</th><th>Units of measure</th><th>Averaging period</th><th>Frequency</th></tr><tr><td>Siting</td><td>AM-1</td><td>-</td><td>-</td><td>-</td></tr><tr><td>Siting</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 &amp; 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 &amp; AM-4</td><td>Degrees</td><td>10 minutes</td><td>Continuous</td></tr></table>	Parameter	Sampling method	Units of measure	Averaging period	Frequency	Siting	AM-1	-	-	-	Siting	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	<p>An installation and commissioning report from Thompson Environmental Systems dated 28/11/2017 was observed. This confirms installation of a Visual Master Pro meteorological station prior to commencement of the operation on 4 April 2018.</p> <p>The data logging system is currently installed at Duggan &amp; Hede's office and JJ Richards are progressing towards having it installed within their corporate systems which will allow any nominated staff member to access the data.</p> <p>Screenshots of the weather station system and data recorded on 10/05/2018 were provided showing rainfall, windspeed, direction and temperature. Documentation from Thomson Environmental Systems confirms the mast supplied for the project is 10metres high (10.35m to be exact) and is fitted with a Lufft all-in-one weather sensor for measurement of temperature, relative humidity, air pressure, wind direction and wind speed.</p>	Compliant	
Parameter	Sampling method	Units of measure	Averaging period	Frequency																																							
Siting	AM-1	-	-	-																																							
Siting	AM-2	-	-	-																																							
Rainfall	AM-4	millimetres per hour	1 hour	Continuous																																							
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Wind Direction at 10 metres	AM-2 & AM-4	Degrees	10 minutes	Continuous																																							

Condition	Comment	Compliance Status	Observation or Recommendation
<b>M5 Recording of pollution complaints</b> 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.	JJ Richards advised that there have been no complaints of any nature received to date. Section 21 of the OEMP outlines Complaints Management processes including recording of complaint details on Attachment 36 General Feedback form.	Compliant	
M5.2 The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	JJ Richards advised that there have been no complaints of any nature received to date. Attachment 36 General Feedback Form (SBMP No. 12.01-01) was observed and addresses items a) to f).	Compliant	
M5.3 The record of a complaint must be kept for at least 4 years after the complaint was made.	JJ Richards advised that there have been no complaints of any nature received to date. Section 21 of the OEMP outlines Complaints Management processes including recording of complaint details on Attachment 36 General Feedback form. Section 13 of the OEMP outlines Documentation and Records Management processes which link with Corporate Document G2 Records Management which prescribes processes for record retention. A copy of the SBMP 1.06-02 Form Retention, Archiving and Destruction Register was observed.	Compliant	
M5.4 The record must be produced to any authorised officer of the EPA who asks to see them.	JJ Richards advised records will be made available to any authorised officer of the EPA if requested.	Compliant	
<b>M6 Telephone complaints line</b>	JJ Richards have a telephone Complaints Line listed on their	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
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.	website (Glendenning page).  Section 21 of the OEMP Complaints Management outlines the processes for customer complaints to be recorded and actioned.		
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.	JJ Richards have a telephone Complaints Line listed on their website (Glendenning page).	Compliant	<i>Observation 15</i>  Should JJ Richards require new signage for the facility entrance, consideration could be given to including the telephone complaints line information on this signage.
M6.3 The preceding two conditions do not apply until 3 the date of the issue of this licence.	Typographical error noted in condition wording. It is presumed the intent is that the telephone complaints line be established within 30 days from the date of issue.  As per conditions M6.1/M6.2, this condition has been met since commencement of operations.	Compliant	
<b>PART 6 – REPORTING CONDITIONS</b>			
<b>R1 Annual return documents</b>  R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish	JJ Richards advised that all Annual Returns are handled by the Legal Team to process within relevant timeframes. An Environmental Licence Register is managed by the Legal Team who will prepare and submit all annual return documentation in accordance with this condition.  The first reporting period is 12 months after the issue of the EPA Licence No. 21053, being 4 <sup>th</sup> April 2018, therefore this condition has not been triggered as yet.	Not triggered	

Condition	Comment	Compliance Status	Observation or Recommendation
<p>Pollution Monitoring Data; and</p> <p>7. a Statement of Compliance - Environmental Management Systems and Practices.</p> <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>			
<p>R1.2 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>	Refer to R1.1. Condition not triggered as yet.	Not triggered	
<p>R1.3 Where this licence is transferred from the licensee to a new licensee:</p> <p>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</p> <p>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> <p>Note: An application to transfer a licence must be made in the approved form for this purpose.</p>	EPA Licence No. 21053 has not been transferred between parties. Condition is not applicable.	Not triggered	
<p>R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:</p> <p>a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</p> <p>b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.</p>	EPA Licence No. 21053 has not been surrendered or revoked. Condition is not applicable.	Not triggered	



Condition	Comment	Compliance Status	Observation or Recommendation
R1.5 The Annual Return for the reporting period must be supplied to the EPA via eConnect <i>EPA</i> 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>JJ Richards advised that all Annual Returns are handled by the Legal Team to process within relevant timeframes. An Environmental Licence Register is managed by the Legal Team who will prepare and submit all annual return documentation in accordance with this condition.</p> <p>The first reporting period is 12 months after the issue of the EPA Licence No. 21053, being 4<sup>th</sup> April 2018, therefore this condition has not been triggered as yet.</p>	Not triggered	
R1.6 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Section 13 of the OEMP outlines Documentation and Records Management processes which links with Corporate Document G2 Records Management which prescribes processes for record retention. JJ Richards advised Annual Returns are retained indefinitely.	Compliant	
<p>R1.7 Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:</p> <p>a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.</p>	<p>JJ Richards advised that all Annual Returns are handled by the Legal Team to process within relevant timeframes. An Environmental Licence Register is managed by the Legal Team who will prepare and submit all annual return documentation in accordance with this condition.</p> <p>The first reporting period is 12 months after the issue of the EPA Licence No. 21053, being 4<sup>th</sup> April 2018, therefore this condition has not been triggered as yet.</p>	Not triggered	
<p><b>R2 Notification of environmental harm</b></p> <p>R2.1 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>	<p>JJ Richards advised that no notifications of environmental harm have been required to date.</p> <p>An Operational Environmental Management Plan (OEMP) Version 1.3 dated November 2017 is currently in place and Section 20 outlines Incident Management processes. Review of Section 20 indicates internal reporting of all incidents to the Legal Team within 24 hours. The Legal Team are then responsible for notification to external authorities.</p>	Not triggered	
R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the	As per condition R2.1, JJ Richards advised that no notifications of environmental harm have been required to	Not triggered	



Condition	Comment	Compliance Status	Observation or Recommendation
incident occurred.	<p>date.</p> <p>An Operational Environmental Management Plan (OEMP) Version 1.3 dated November 2017 is currently in place and Section 20 outlines Incident Management processes. Review of Section 20 indicates internal reporting of all incidents to the Legal Team within 24 hours. The Legal Team are then responsible for notification to external authorities.</p>		
<p><b>R3 Written report</b></p> <p>R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <p>a) where this licence applies to premises, an event has occurred at the premises; or</p> <p>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.</p>	<p>JJ Richards advised that no requests of this nature have been received to date. Should such a request be received, the Legal Team will respond and manage the process.</p>	Not triggered	
<p>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.</p>	<p>As per condition R3.1, JJ Richards advised that no requests of this nature have been received to date.</p>	Not triggered	
<p>R3.3 The request may require a report which includes any or all of the following information:</p> <p>a) the cause, time and duration of the event;</p> <p>b) the type, volume and concentration of every pollutant discharged as a result of the event;</p> <p>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;</p> <p>d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who</p>	<p>As per condition R3.1, JJ Richards advised that no requests of this nature have been received to date.</p>	Not triggered	

Condition	Comment	Compliance Status	Observation or Recommendation
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.			
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.	As per condition R3.1, JJ Richards advised that no requests of this nature have been received to date.	Not triggered	
<b>PART 7 – GENERAL CONDITIONS</b>			
<b>G1 Copy of licence kept at the premises or plant</b> G1.1 A copy of this licence must be kept at the premises to which the licence applies.	JJ Richards advised that an electronic copy is available via the company's internal intranet. A hardcopy of the licence is also available in the site office and was observed on-site during the audit.	Compliant	
G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.	JJ Richards advised that the Legal Team would be contacted if the EPA arrive on site who would advise on action to take. JJ Richards advised the licence will be made available to any authorised officer of the EPA if requested.	Compliant	
G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.	JJ Richards advised that an electronic copy is available via the company's internal intranet. A hardcopy of the licence is also available in the site office and was observed on-site during the audit.  JJ Richards also have a comprehensive training process in place and Training Records for three (3) staff were observed being Ben Martis (11-12/04/2018), Daniel Lownds (03/05/2018) and Marc Lequesne (03/05/2018). Topics covered as noted on	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
	these training forms included Relevant Approvals including the Development Consent, EPA Licence and Trade Waste Approval.		
<b>PART 8 – SPECIAL CONDITIONS</b>			
<b>E1 Financial Assurance</b> E1.1 By 1 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.	JJ Richards advised financial assurance was provided to the EPA in accordance with this condition on 1 May 2018. Email correspondence from the EPA dated 2 May 2018 and confirming compliance with E1.1 was observed.	Compliant	
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.	Commonwealth Bank Guarantee Duplicate document G597956 was observed and addressed requirements of this condition.	Compliant	
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.	Commonwealth Bank Guarantee Duplicate document G597956 was observed and addressed requirements of this condition.	Compliant	
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.	JJ Richards advised no claims of the nature have been made to date.	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 program required to be carried out by the licence which has not been undertaken by the licence holder.	JJ Richards advised no claims of the nature have been made to date.	Not triggered	

Condition	Comment	Compliance Status	Observation or Recommendation
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.	JJ Richards advised document was hand delivered by Commonwealth Bank. Confirmation from Commonwealth Bank that they delivered and email from EPA to confirm receipt can be provided.  Commonwealth Bank Guarantee Duplicate document G597956 was observed.	Compliant	
<b>E2 Claims on Financial Assurances</b>  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.	JJ Richards advised no claims on financial assurance have been made to date.	Not triggered	
<b>E3 Environmental Obligations of the Licensee</b>  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.	a) An Operational EMP (OEMP) version 1.3 dated November 2017 is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility.  Section 24 of the OEMP Spill Management outlines the range of controls implemented to address the risk of spills. This section is supported by Attachment 39 Spill Management (addressing spill kit requirements, maintenance and training) and Attachment 40 Emergency Procedure Guide which provides a procedure flowchart for spill response (liquid & solid).  Section 25 Stormwater Management of the OEMP discusses control measures to minimise potential for the pollution of waters, including bunding and containment provisions on-site.  Section 20 of the OEMP Incident Management provides an overview of the reporting and management process for environmental incidents (including spills).  b) Section 30 of the OEMP Operational Procedures outlines the procedures for waste acceptance, waste oil handling, oily water receipt, grease trap waste handling, liquid food waste, non-compliant load procedures and a daily site checklist.	Compliant	

Condition	Comment	Compliance Status	Observation or Recommendation
	c) No monitoring has been undertaken to date. JJ Richards advised monitoring data will be provided in accordance with this condition.		
<p>E3.2 In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must:</p> <p>a) make all efforts to contain all firewater on the licensee's premises,</p> <p>b) make all efforts to control air pollution from the licensee's premises,</p> <p>c) make all efforts to contain any discharge, spill or run-off from the licensee's premises,</p> <p>d) make all efforts to prevent flood water entering the licensee's premises,</p> <p>e) remediate and rehabilitate any exposed areas of soil and/or waste,</p> <p>f) lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of,</p> <p>g) at the request of the EPA monitor groundwater beneath the licensee's premises and its potential to migrate from the licensee's premises,</p> <p>h) at the request of the EPA monitor surface water leaving the licensee's premises; and</p> <p>i) ensure the licensee's premises is secure.</p>	<p>JJ Richards advised that a Pollution Incident Response Management Plan (PIRPMP) is currently being prepared and will be submitted within the required timeframe. The Draft PRIMP Version 2 January 2018 was observed and includes a risk assessment for the Glendenning Liquid Waste Facility. This risk assessment identifies hazards associated with emergency situations including fire and natural disasters and associated control measures in place.</p> <p>An Operational EMP (OEMP) version 1.3 dated November 2017 is currently in place and forms the basis for management of environmental risk at the Glendenning Liquid Waste Facility.</p> <p>Section 19 of the OEMP Emergency Planning and Management outlines emergency response processes including provision of an internal Fire and Emergency Training module for staff.</p>	Compliant	
<p>E3.3 After the licensee's premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must:</p> <p>a) remove and lawfully dispose of all liquid and non-liquid</p>	The storage and treatment of grease trap waste and food waste was recently commissioned on 4 April 2018. This condition is not applicable at this point in time.	Not triggered	

Condition	Comment	Compliance Status	Observation or Recommendation
waste stored on the licensee's premises; and b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination.			
<b>E4 Post Commissioning Odour Audit</b> E4.1 The Licensee must engage a suitably qualified and experienced consultant to undertake a Post Commissioning Odour Audit of the premises.	JJ Richards advised monitoring will be conducted in accordance with this condition and that they are in the process of engaging Air Noise Environment to undertake a Post Commissioning Odour Audit.  Air Noise Environment are suitably qualified and have considerable experience in air quality management. The scope of works for the Odour Audit was observed and includes reference to the Condition B14 of the Development Consent and also Condition E4.2 of the EPA Licence.	Compliant	
E4.2 The Post Commissioning Odour Audit must include, but is not limited to:  a) Present the results (including test reports) of post commissioning sampling and analysis for the discharge from activated carbon filter(s) servicing the organic waste process area. The post commissioning sampling and analysis required under condition M2. The sampling methods are those contained in the <i>Approved Methods for Sampling and Analysis of Air Pollutants in NSW</i> (EPA, 2016). Detailed activity data and process description at the time of sampling must be included.  b) Compare results of post commissioning sampling with the emission estimation in the Air and Noise Assessment submitted as part of Development Application SSD6767.  c) Details and analysis of any odour complaints received and any actions taken to address verified complaints. Any analysis conducted should make reference to the data collected by the onsite meteorological station required under condition M4 and operational details at the time of receiving the complaint.  d) An evaluation of the performance of odour mitigation and management measures implemented at the premises,	JJ Richards advised monitoring will be conducted in accordance with this condition and that they are in the process of engaging Air Noise Environment to undertake a post-commissioning Odour Audit.  Air Noise Environment are suitably qualified and have considerable experience in air quality management. The scope of works for the Odour Audit was observed and includes reference to Condition B14 of the Development Consent and also Condition E4.2 of the EPA Licence.	Not triggered	

Condition	Comment	Compliance Status	Observation or Recommendation
<p>including the activated carbon filters(s).</p> <p>e) Where analysis undertaken in parts (b), (c), (d) indicates the potential for adverse odour beyond the site boundary investigation into additional reasonable and feasible mitigation measures must be conducted.</p> <p>f) The nomination of a timeframe to implement any additional measures identified in part (e).</p>			
<p>E4.3 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 orelectronically to <a href="mailto:hazardous.materials@epa.nsw.gov.au">hazardous.materials@epa.nsw.gov.au</a>.</p> <p>Note: Further conditions or Pollution Studies and Reduction Programs may be added onto the Licence pending on the outcomes of this Odour Audit.</p>	<p>JJ Richards stated they will comply with this timeframe.</p>	Not triggered	

**ATTACHMENT A:**

Mark Rigby & Associates Pty Ltd Company Capability Statement



JJ Richards & Sons Pty Ltd  
3 Grant Street  
Cleveland NSW 4163

Dear Mr Nicholson

**Glendenning Liquid Waste Facility (SSD 6767) endorsement of Independent Environmental Auditors**

I refer to your email dated of 28 February 2018 and 14 March 2018 requesting approval for Mr Mark Rigby and Ms Alison Reiser of Mark Rigby & Associates Pty Ltd to undertake the 2018 Independent Environmental Audit in accordance with condition C9, Schedule B of the Consent SSD 6767.

The Department has reviewed the nominated audit team and considers them suitably qualified and experienced to undertake the audit. Accordingly, the Secretary approves Mark Rigby (lead auditor) and Alison Reiser to undertake the audit, conditional upon the their independence from the project.

In preparing the IEA, you must ensure the audit:

- is conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing;
- includes a compliance table indicating the compliance status of each condition of approval (and any other statutory instrument required to be audited);
- avoids terms such as "partial compliance". An audit is to make findings of either "compliance" or "non-compliance";
- includes recommended actions in response to non-compliances; and
- identifies opportunities for improved environmental management and performance.

Finally, the Department requests that you:

1. review the IEA report to ensure it complies with the relevant conditions of consent, prior to submitting the report to the Secretary; and
2. submit an action plan with the audit report(s) detailing your response to the auditor's recommendations and timeframes to implement any adopted recommendations.

Should you have any further enquiries about this matter, please contact Alfarid Hussain on (02) 9274 6456 or [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).

Yours sincerely



Julia Pope  
Team Leader Compliance  
As the Secretary's nominee

19/3/18

## CAPABILITY OVERVIEW STATEMENT

Mark Rigby & Associates Pty Ltd (MRA) is a well respected and established multidisciplinary environmental consultancy firm based on the Gold Coast. We have provided professional Environmental Management and Environmental Health Services for over 18 years. Our Team is made up of highly motivated and experienced individuals capable of delivering quality service and cost effective environmental management solutions. The company's Directors, Mark Rigby, Natalie Hoskins and Allison Reiser have 36 years, 29 years and 20 years experience respectively, in environmental related areas, including Local and State Governments and the private industry. In Mark's last 7 years with Local Government he managed the Environment Protection Section for the Gold Coast City Council.

### Services

#### Environmental Management

- Environmental Permits, Approvals and TEP's
- Risk Assessment and Hazard Assessment
- Environmental Management Systems (AS/NZS ISO 14001) development, implementation and maintenance
- Environmental Documentation and Procedure development, including Site/Activity Based Management Plans
- Environmental Training
- Dangerous Goods Management, in particular Flammable & Combustible Liquids Storage
- Waste Management
- Environmental Health
- Environmental Management Plans (construction and operational phase)
- Contaminated Land
- Climate Change and Sustainability Reporting – NPI, NGERS, Carbon footprint assessment

#### Planning & Approvals

- All Development Applications, including MCU and OPW
- Applications for Environmentally Relevant Activities
- Operational Works Applications for Vegetation Clearing
- Assistance with Council and DES policy and code responses
- Landfill and Waste Transfer Station regulatory approvals
- Rehabilitation Plans
- Fauna Management Plans
- Open Space Management Plans
- Waste Management Plans
- Stormwater Management Plans
- EPBC Act approvals and referrals

## Impact Assessment & Monitoring

- Air Quality – Dust and Odour
- Noise
- Surface Water Quality and MUSIC Modelling
- Groundwater
- Acid Sulfate Soils investigations
- Vegetation and Ecology
- Monitoring program development, implementation and result interpretation reporting
- Annual Reports & Returns

## Vegetation and Ecological Assessment

- Flora Surveys
- Fauna Surveys
- Biodiversity Assessments
- Offsets
- Vegetation Management Plans
- Property maps of Assessable Vegetation (regional ecosystems)

## Auditing

- NSW Independent Environmental Audits
- Compliance with Regulatory Approvals and/or Codes
- Legislative Compliance audits (local, state and federal)
- EMS ISO 14001 & gap analysis audits
- Exemplar Global Certified Auditors
- Australian Dangerous Goods Code
- Due Diligence
- Waste audits
- Energy audits
- Site Contamination Assessment
- Environmental Report Verification

## Professional Memberships



## Specialties

Key areas of expertise that differentiate MRA from other companies:

- Multidisciplinary 'in house' team of experienced qualified experts and use of highly respected sub consultants.
- Extensive experience project managing the delivery of Environmentally Relevant Activity approvals, in particular for waste management operations, landfills, waste transfer stations and extractive industries.
- Thorough knowledge and experience with required methodologies for environmental impact assessment, particularly in flora and fauna survey for development assessment, EPBC matters, referrals and offsetting.
- Wide range of auditing experience across both public and private sector organisations ranging from food processing industries, food premises, waste industries, civil construction, general industry, ERA's, petroleum and mining operations.
- Extensive knowledge of practical implementation of planning and environmental legislative requirements including development applications.
- Established relationships with relevant regulatory authorities.
- Customer care skills and drive for customer satisfaction.

## Key Environmental Audit Projects

- Dunloe Park Sand Quarry – Independent Environmental Audit (2017) – This project involved undertaking an Independent Environmental Audit of the Dunloe Park Sand Project (Dunloe Sands) as required by the project approval issued under the *Environmental Planning and Assessment Act 1979*. This audit was undertaken in accordance with NSW Independent Audit Guidelines and involved assessing the level of compliance with the Project Approval conditions.
- Boral – Audits of Hard Rock and Sand Quarries – This project involved numerous environmental audits of Boral's hard rock and sand quarries (West Burleigh, Ormeau, Stapylton, Petrie, Narangba, Mooloolah, Coolum, Bundaberg). Specifically, Boral's environmental performance was assessed as determined by the level of compliance with the conditions of their Development Approvals. The project involved on-going liaison with State Government departments and Boral's management.
- Village Roadshow Theme Parks – EMS development including risk register preparation (2010 to present) – Review of relevant client environmental documentation, the conduct of environmental risk assessments and the preparation of a gap analysis that outlines the scope of works required to develop an Environmental Management System (EMS) consistent with the principles of AS/NZS ISO 14001:2004 - Environmental Management Systems. Following this, MRA has prepared an environmental aspects and impacts (risk) register to integrate with their existing Occupational Health & Safety Management System and associated EMS documentation to meet ISO 14001 elements.

- Sunshine Coast Council, Waste & Resources Management - Site Based Management Plan for Waste Facilities, System Development & Periodic Auditing of Waste Facilities (2010 to present)  
- This project has involved the development of a Site Based Management Plan based on ISO 14001 environmental management system standards and the Department of Environment and Heritage (formally EPA/DERM) guidelines. This has involved the conduct of environmental risk assessments, preparation of environmental aspects & impacts registers for thirteen (13) waste facilities (landfills and resource recovery centres), development of environmental objectives & targets, preparation of environmental procedures and environmental management plans to address operational risks and legislative requirements associated with these activities. We have subsequently undertaken periodic management system audits of the Site Based Management Plan and our ongoing relationship with this project has been due to our expertise in practical environmental management system design & implementation and a thorough knowledge of the operational and environmental requirements of our client.

## References

### Dunloe Sand Quarry

Sasha Peterson  
Ramtech Pty Ltd  
Director  
Phone: 02 667 28883 / 0401 805 446

### Sunshine Coast Council

Alex Patissier  
Coordinator - Recovery, Diversion & Disposal  
Waste & Resources Management Branch  
Sunshine Coast Council  
Phone: 07 5475 8708

### Boral

Paul West  
Regional Manager – Boral Property Group (Northern Region)  
0401 896115

### Village Roadshow Theme Parks

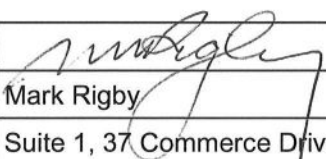
John Donaldson  
Group Manager OHS&E  
Village Roadshow Theme Parks  
Phone: 0414 373 145

For further detailed information please visit our website at [www.mraenvironmental.com.au](http://www.mraenvironmental.com.au) or please call our Robina office on 55787040.

**ATTACHMENT B:**

Mark Rigby & Associates Audit Report Certification

# Independent Audit Certification Form

Independent Audit Certification Form	
Development Name	Glendenning Liquid Waste Treatment Facility
Development Consent No.	SSD 6767
Description of Development	Construction and operation of a liquid waste treatment facility with the capacity to process up to 52,000 tonnes of liquid waste per annum
Development Address	14 Rayben Street, Glendenning NSW 2761 (Lot 123 DP870988)
Operator	JJ Richards and Sons Pty Ltd
Operator Address	PO Box 235, Cleveland, QLD 4163
Independent Audit	
Title of Audit	Independent Environmental Audit, June 2018 Glendenning Liquid Waste Treatment Facility
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> <li>• The audit has been undertaken in accordance with relevant approval condition(s) and in accordance with the auditing standard AS/NZS ISO 19011:2014 and Post Approval Guidelines — Independent Audits</li> <li>• The findings of the audit are reported truthfully, accurately and completely;</li> <li>• I have exercised due diligence and professional judgement in conducting the audit;</li> <li>• I have acted professionally, in an unbiased manner and did not allow undue influence to limit or override objectivity in conducting the audit;</li> <li>• I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</li> <li>• I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);</li> <li>• Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</li> <li>• I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</li> </ul> <p><i>Note.</i></p> <p>a) The Independent Audit is an 'environmental audit' for the purposes of section 1228(2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</p> <p>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</p>	
Signature	
Name of Lead / Principal Auditor	Mark Rigby
Address	Suite 1, 37 Commerce Drive, Robina, QLD 4226
Email Address	<a href="mailto:mrigby@mraenvironmental.com.au">mrigby@mraenvironmental.com.au</a>
Auditor Certification (if relevant)	Exemplar Global Auditor Certificate No. 15303
Date:	8 <sup>th</sup> August 2018

**ATTACHMENT C:**

Consultation Correspondence



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**From:** Allison Reiser [areiser@mraenvironmental.com.au]  
**Sent:** Friday, 27 April 2018 9:47 AM  
**To:** 'leanne.grove@planning.nsw.gov.au'; 'emma.barnet@planning.nsw.gov.au';  
'raelene.west@epa.nsw.gov.au'; 'rebecca.johnson@lands.nsw.gov.au';  
'janne.grose@dpi.nsw.gov.au'; 'hannah.gilvear@sydneywater.com.au';  
'john.zmijewski@sydneywater.com.au'  
**Cc:** 'mrigby@mraenvironmental.com.au'; 'Amiee Hanna'; 'Kurt Whalan'  
**Subject:** Consultation on Independent Environmental Audit - Glendenning Liquid Waste Facility

Good morning,

On behalf of JJ Richards and Sons Pty Ltd, we are in the process of undertaking an Independent Environmental Audit (IEA) which assesses the level of environmental performance of their Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning.

The IEA is a requirement of the site's Development Consent and will involve a site inspection and assessment against the conditions within the NSW Department of Planning and Environment Development Consent SSD 6767 dated 11 January 2017.

A requirement of the IEA process, is that prior to commencement of the site inspection, consultation with relevant agencies involved with the development be undertaken to obtain their feedback and allow the agency opportunity to draw the auditor's attention to any key issues within the scope of the audit. JJ Richards and Sons Pty Ltd have provided your contact details in this regard.

Please note that the Glendenning Liquid Waste Facility is not fully commissioned as yet and a summary of the current operational status is provided below:

- Stores and treats grease trap waste that is liquid waste (recently commissioned);
- Stores food waste that is liquid waste for aggregation and transport for beneficial reuse in the cultivation of feed crops (recently commissioned);
- Stores used oil for resource recovery, aggregation and transport to re-refining and other appropriately licensed facilities for treatment (not commissioned as yet); and
- Stores and treats industrial oily water (not commissioned as yet).

The site inspection is scheduled to take place on Wednesday 9<sup>th</sup> May 2018. If you would like to provide any comment for consideration during the IEA process, please feel free to contact me by email or phone to discuss.

Regards, Allison.

**Allison Reiser** *B. App. Sc. (Env Health), Env. Auditor*  
*Director & Senior Environmental Consultant*

MRA Environmental  
PO BOX 480, Robina Q 4226  
p 07 55787040  
f 07 55787313  
<http://www.mraenvironmental.com.au>



**MARK RIGBY & ASSOCIATES**  
*excellence in environmental management*



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**From:** Allison Reiser [areiser@mraenvironmental.com.au]  
**Sent:** Friday, 27 April 2018 9:52 AM  
**To:** 'council@blacktown.nsw.gov.au'  
**Cc:** 'mrigby@mraenvironmental.com.au'; 'Kurt Whalan'; 'Amiee Hanna'  
**Subject:** Consultation on Independent Environmental Audit - Glendenning Liquid Waste Facility - Attention: Judith Portelli

Good morning Judith,

On behalf of JJ Richards and Sons Pty Ltd, we are in the process of undertaking an Independent Environmental Audit (IEA) which assesses the level of environmental performance of their Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning.

The IEA is a requirement of the site's Development Consent and will involve a site inspection and assessment against the conditions within the NSW Department of Planning and Environment Development Consent SSD 6767 dated 11 January 2017.

A requirement of the IEA process, is that prior to commencement of the site inspection, consultation with relevant agencies involved with the development be undertaken to obtain their feedback and allow the agency opportunity to draw the auditor's attention to any key issues within the scope of the audit. JJ Richards and Sons Pty Ltd have provided your contact details in this regard.

Please note that the Glendenning Liquid Waste Facility is not fully commissioned as yet and a summary of the current operational status is provided below:

- Stores and treats grease trap waste that is liquid waste (recently commissioned);
- Stores food waste that is liquid waste for aggregation and transport for beneficial reuse in the cultivation of feed crops (recently commissioned);
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- Stores and treats industrial oily water (not commissioned as yet).

The site inspection is scheduled to take place on Wednesday 9<sup>th</sup> May 2018. If you would like to provide any comment for consideration during the IEA process, please feel free to contact me by email or phone to discuss.

Regards, Allison.

**Allison Reiser** *B. App. Sc. (Env Health), Env. Auditor*  
*Director & Senior Environmental Consultant*

MRA Environmental  
PO BOX 480, Robina Q 4226  
p 07 55787040  
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**From:** Allison Reiser [areiser@mraenvironmental.com.au]  
**Sent:** Friday, 27 April 2018 9:55 AM  
**To:** 'development.sydney@rms.nsw.gov.au'  
**Cc:** 'mrigby@mraenvironmental.com.au'; 'Kurt Whalan'; 'Amiee Hanna'  
**Subject:** Consultation on Independent Environmental Audit - Glendenning Liquid Waste Facility

Attention: Xi Lin  
Attention: Ahsanul Amin

Good morning,

On behalf of JJ Richards and Sons Pty Ltd, we are in the process of undertaking an Independent Environmental Audit (IEA) which assesses the level of environmental performance of their Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning.

The IEA is a requirement of the site's Development Consent and will involve a site inspection and assessment against the conditions within the NSW Department of Planning and Environment Development Consent SSD 6767 dated 11 January 2017.

A requirement of the IEA process, is that prior to commencement of the site inspection, consultation with relevant agencies involved with the development be undertaken to obtain their feedback and allow the agency opportunity to draw the auditor's attention to any key issues within the scope of the audit. JJ Richards and Sons Pty Ltd have provided your contact details in this regard.

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The site inspection is scheduled to take place on Wednesday 9<sup>th</sup> May 2018. If you would like to provide any comment for consideration during the IEA process, please feel free to contact me by email or phone to discuss.

Regards, Allison.

**Allison Reiser** *B. App. Sc. (Env Health), Env. Auditor*  
*Director & Senior Environmental Consultant*

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f 07 55787313  
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**From:** ZMIJEWSKI, JOHN [John.Zmijewski@sydneywater.com.au]  
**Sent:** Monday, 30 April 2018 9:26 AM  
**To:** 'areiser@mraenvironmental.com.au'  
**Subject:** RE: Consultation on Independent Environmental Audit - Glendenning Liquid Waste Facility

Hi Allison,

J.J.Richards and Sons Pty Ltd have applied for consent to discharge Industrial trade wastewater to Sydney Waters' sewerage system at 14 Rayben St. Glendenning. A conditional consent has been granted to the company.

For your information.

Regards

John Zmijewski  
Business Customer Representative, Major Customers  
Customer Delivery  
Sydney Water  
Gate 0, 33-73 Links Road, St Marys NSW 2760

P 8805 5548 / M 0419 273 159  
E [john.zmijewski@sydneywater.com.au](mailto:john.zmijewski@sydneywater.com.au)

---

**From:** Allison Reiser [mailto:areiser@mraenvironmental.com.au]  
**Sent:** Friday, 27 April 2018 9:47 AM



**To:** leanne.grove@planning.nsw.gov.au; emma.barnet@planning.nsw.gov.au;  
raelene.west@epa.nsw.gov.au; rebecca.johnson@lands.nsw.gov.au;  
janne.grose@dpi.nsw.gov.au; hannah.gilvear@sydneywatercom.au; ZMIJEWSKI,  
JOHN <John.Zmijewski@sydneywater.com.au>

**Cc:** mrigby@mraenvironmental.com.au; 'Amiee Hanna' <Amiee.Hanna@jjrichards.com.au>; 'Kurt Whalan' <Kurt.Whalan@jjrichards.com.au>

**Subject:** Consultation on Independent Environmental Audit - Glendenning Liquid Waste Facility

Good morning,

On behalf of JJ Richards and Sons Pty Ltd, we are in the process of undertaking an Independent Environmental Audit (IEA) which assesses the level of environmental performance of their Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning.

The IEA is a requirement of the site's Development Consent and will involve a site inspection and assessment against the conditions within the NSW Department of Planning and Environment Development Consent SSD 6767 dated 11 January 2017.

A requirement of the IEA process, is that prior to commencement of the site inspection, consultation with relevant agencies involved with the development be undertaken to obtain their feedback and allow the agency opportunity to draw the auditor's attention to any key issues within the scope of the audit. JJ Richards and Sons Pty Ltd have provided your contact details in this regard.

Please note that the Glendenning Liquid Waste Facility is not fully commissioned as yet and a summary of the current operational status is provided below:

- Stores and treats grease trap waste that is liquid waste (recently commissioned);
- Stores food waste that is liquid waste for aggregation and transport for beneficial reuse in the cultivation of feed crops (recently commissioned);
- Stores used oil for resource recovery, aggregation and transport to re-refining and other appropriately licensed facilities for treatment (not commissioned as yet); and
- Stores and treats industrial oily water (not commissioned as yet).

The site inspection is scheduled to take place on Wednesday 9<sup>th</sup> May 2018. If you would like to provide any comment for consideration during the IEA process, please feel free to contact me by email or phone to discuss.

Regards, Allison.

**Allison Reiser** B. App. Sc. (Env Health), Env. Auditor  
Director & Senior Environmental Consultant

MRA Environmental  
PO BOX 480, Robina Q 4226  
p 07 55787040  
f 07 55787313  
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**From:** Holly Palmer [Holly.Palmer@blacktown.nsw.gov.au]  
**Sent:** Thursday, 17 May 2018 10:02 AM  
**To:** areiser@mraenvironmental.com.au  
**Subject:** Consultation on Independent Environmental Audit - Glendenning Liquid Waste Facility - Attention: Judith Portelli - refer to EHU for advice

Hi Allison,

Thank you for your email.

Our Environmental Health Officer has reviewed this matter, and advises that the Independent Environmental Audit should assess compliance with the EPL, and conditions relating to: Operation of Plant and Equipment, Odour, Odour Management Plan, Noise Mitigation, Noise Compliance Measurement, and Bunding.

This is provided for your consideration and inclusion in your assessment.

Feel free to contact me with any questions.

Kind Regards,

**Holly Palmer**  
**Senior Project Planner**  
**Blacktown City Council**  
**P | 02 9839 6927**

---

**From:** Allison Reiser [<mailto:areiser@mraenvironmental.com.au>]  
**Sent:** Friday, 27 April 2018 9:52 AM  
**To:** Blacktown Council  
**Cc:** [mrigby@mraenvironmental.com.au](mailto:mrigby@mraenvironmental.com.au); 'Kurt Whalan'; 'Amiee Hanna'  
**Subject:** Consultation on Independent Environmental Audit - Glendenning Liquid Waste Facility - Attention: Judith Portelli

Good morning Judith,

On behalf of JJ Richards and Sons Pty Ltd, we are in the process of undertaking an Independent Environmental Audit (IEA) which assesses the level of environmental performance of their Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning.

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Regards, Allison.

**Allison Reiser** *B. App. Sc. (Env Health), Env. Auditor*  
*Director & Senior Environmental Consultant*

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## **ATTACHMENT D:**

Photos from site audit



Organics Building – Doors remain closed at all times other than when incoming vehicles gain access. Entry to Organics Building at present is by manual access permitted by site personnel. Ventilation perforations can be seen in the lower portion of the building's roller shutters.





Rear of Organics Building – Rainwater tanks and SPEL stormwater infrastructure observed to be in place.



Stormwater infrastructure located in the north-eastern corner of the site.





Incoming organic waste receival area within the Organics Building. Vehicles are unloaded within the imperviously sealed bunded area with in-ground sumps for spill containment.



Bunded incoming organic waste unloading area drive-over bunding and in-ground sumps for containment of waste material.



Incoming organic waste unloading bay monitoring system and emergency stop button.



Odour Control Unit located above the DAF unit enclosed room.



Dissolved Air Flotation (DAF) Unit within enclosed room.



Trade Waste connection within DAF Unit room.





Separation of organic waste into fat/grease, water & sludge layers.



Organic waste sludge



Sludge and aggregated Food Waste storage tanks and dispatch loading bay area.



Imperviously sealed floor with in-ground sump for spill containment.



Pipework going over bund walls



Caustic stored within the bunded tank farm area & used to adjust the pH within the DAF Unit





Organics Building – EPA permission granted for minor gaps in building walls observed above and below.







Weighbridge located along north-eastern boundary of property. Not operational at the time of the audit.



Used oil tank farm within roofed bunded area (not commissioned). Rainwater tank for collection of roof water.

Self-bunded Tank for storage of Non-Compliant Product (green container).



Used Oil Tank Farm bunding in place with impervious sealant still in the process of being applied.