


Genesis Landfill and Recycling  
Centre  
*Independent Environmental Audit*

Dial a Dump Industries

February 2018

0397513\_Final

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Independent Audit Certification Form	
Development Name	Genesis Landfill and Recycling Centre
Development Consent No.	06_0139
Description of Development	Landfill and Recycling Centre
Development Address	Honeycomb Drive, Eastern Creek, NSW
Operator	Dial a Dump Industries
Operator Address	76 Burrows Rd, Alexandria NSW 2015
Independent Audit	
Title of Audit	Independent Environmental Audit
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> <li><i>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</i></li> <li><i>The findings of the audit are reported truthfully, accurately and completely;</i></li> <li><i>I have exercised due diligence and professional judgement in conducting the audit;</i></li> <li><i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i></li> <li><i>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;</i></li> <li><i>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);</i></li> <li><i>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 (refer to the attached); and</i></li> <li><i>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.</i></li> </ul> <p><b>Note:</b></p> <p><i>a) The Independent Audit is an 'environmental audit' for the purposes of section 122B(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.</i></p> <p><i>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).</i></p>	
Signature	
Name of Lead/Principal Auditor	Jolyon Peart
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Auditor Certification (if relevant)	Exemplar Global #119930
Date	22 February 2018

### Provision of Consultancy Services during the Audit Period

The ERM audit team was approved by the Department of Planning and Environment on the 30<sup>th</sup> March 2017. At this time, ERM declared to the DP&E that ERM and the team met the independence requirements of the IEA guideline and the audit was subsequently initiated. On the 26<sup>th</sup> of June 2017 ERM announced that it had concluded the acquisition of the environmental consultancy *Pacific Environment*. The intent to acquire and the acquisition process had not been publicised within ERM or externally prior to this date and as such the audit team acted truthfully when declaring their independence. It is noted that two reports reviewed and used as audit documentary evidence in the course of this IEA were prepared by Pacific Environment.

These are:

- Genesis Eastern Creek Compliance Noise Assessment, Pacific Environment, 2015; and
- Genesis Eastern Creek Compliance Noise Assessment, Pacific Environment, 2016.

The acquisition of Pacific Environment by has not compromised the independence of the audit team and is therefore not considered to have affected the findings of this IEA. Further the reports in question were prepared prior to the acquisition, and the audit team have had no contact with any employee of Pacific Environment with respect to the IEA or the site in general.

Jolyon Peart  
Lead Auditor



22 February 2018

## CONTENTS

<b>1</b>	<b>INTRODUCTION</b>	<b>1</b>
<b>1.1</b>	<b>AUDIT OBJECTIVES</b>	<b>1</b>
<b>1.2</b>	<b>SCOPE AND CRITERIA</b>	<b>1</b>
<b>1.3</b>	<b>LIMITATIONS</b>	<b>3</b>
<b>2</b>	<b>METHODOLOGY</b>	<b>4</b>
<b>2.1</b>	<b>APPROACH</b>	<b>4</b>
<b>2.2</b>	<b>AUDIT TEAM</b>	<b>4</b>
<b>2.3</b>	<b>AGENCY AND STAKEHOLDER CONSULTATION</b>	<b>4</b>
<b>2.4</b>	<b>ACTIONS FROM THE PREVIOUS AUDIT</b>	<b>5</b>
<b>2.5</b>	<b>DOCUMENT REVIEW</b>	<b>5</b>
<b>2.6</b>	<b>INTERVIEWS</b>	<b>5</b>
<b>2.7</b>	<b>NOMENCLATURE AND RATIONALE</b>	<b>6</b>
<b>3</b>	<b>AUDIT FINDINGS</b>	<b>7</b>
<b>3.1</b>	<b>SUMMARY OF COMPLIANCE</b>	<b>7</b>
<b>3.1.1</b>	<b>ENVIRONMENTAL PROTECTION LICENCES</b>	<b>7</b>
<b>3.1.2</b>	<b>ENVIRONMENTAL ASSESSMENT REQUIREMENTS</b>	<b>8</b>
<b>3.1.3</b>	<b>ENVIRONMENTAL MANAGEMENT PLAN REQUIREMENTS</b>	<b>10</b>
<b>3.2</b>	<b>GOVERNMENT AGENCY AND STAKEHOLDER CONSULTATION</b>	<b>11</b>
<b>3.3</b>	<b>RECOMMENDATIONS FROM PREVIOUS AUDITS</b>	<b>14</b>
<b>3.4</b>	<b>ENVIRONMENTAL PERFORMANCE SUMMARY</b>	<b>15</b>
<b>3.5</b>	<b>ENVIRONMENTAL RISK</b>	<b>17</b>
<b>3.6</b>	<b>CONTINUAL IMPROVEMENT</b>	<b>17</b>
<b>3.7</b>	<b>ADEQUACY OF EXISTING PLANS AND PROCEDURES</b>	<b>18</b>
<b>4</b>	<b>CONCLUSIONS</b>	<b>19</b>

## ***LIST OF ANNEXES***

<b><i>ANNEX A</i></b>	<b><i>KMH AMBIENT FIELD ODOUR ASSESSMENT</i></b>
<b><i>ANNEX B</i></b>	<b><i>AUDIT TEAM ENDORSEMENT</i></b>
<b><i>ANNEX C</i></b>	<b><i>AGENCY CONSULTATION CORRESPONDENCE</i></b>
<b><i>ANNEX D</i></b>	<b><i>AUDIT CRITERIA AND FINDINGS</i></b>
<b><i>ANNEX E</i></b>	<b><i>LIST OF DOCUMENTS CONSULTED</i></b>
<b><i>ANNEX F</i></b>	<b><i>REGISTER OF CHANGES MADE TO THE IEA REPORT</i></b>

## ***LIST OF TABLES***

<b><i>TABLE 1</i></b>	<b><i>ENVIRONMENTAL PROTECTION LICENCE 20121</i></b>
<b><i>TABLE 2</i></b>	<b><i>ENVIRONMENTAL PROTECTION LICENCE 13426</i></b>
<b><i>TABLE 3</i></b>	<b><i>PROJECT APPROVAL 06_0139 (MOD 5)</i></b>
<b><i>TABLE 4</i></b>	<b><i>ENVIRONMENTAL ASSESSMENT (LIGHT HORSE BUSINESS CENTRE VOLUME 1)</i></b>
<b><i>TABLE 5</i></b>	<b><i>EA ASSESSMENTS AND REPORTS</i></b>
<b><i>TABLE 6</i></b>	<b><i>MANAGEMENT PLANS AND PROCEDURES</i></b>
<b><i>TABLE 7</i></b>	<b><i>AGENCY AND STAKEHOLDER CONSULTATION</i></b>
<b><i>TABLE 8</i></b>	<b><i>CRITERIA DERIVED FROM THE FINDINGS OF PREVIOUS AUDITS</i></b>

## INTRODUCTION

ERM Australia Pty Ltd (ERM) was engaged by Dial a Dump Industries ('DADI' or 'the Client') to undertake an Independent Environmental Audit (IEA, 'the audit') at the Genesis Landfill and Recycling Centre, located on Honeycomb Drive, Eastern Creek, NSW ('the Site' or 'the project').

Under the conditions of the project consent, an IEA is required to be undertaken on the Site every two years. This IEA follows an IEA undertaken by Cardno in June 2015 and therefore covers an audit period reflective of June 2015 to June 2017.

### 1.1

#### AUDIT OBJECTIVES

The project consent 06\_0139 defines the requirements for IEAs conducted on the Site. This IEA has been undertaken for the purpose of addressing Conditions 7(a), 7(b), 7(d), 7(e) and 7(f) within Schedule 5 of the project consent.

The objectives of the audit were therefore to:

- Consult with relevant government agencies and obtain feedback on their issues of particular interest and concern;
- Assess the environmental performance of the project and assess whether it is complying with the relevant statutory obligations including those detailed within the project approval, the project EPLs and those obligations generated by any assessment, plan or program required as a condition of approval under the project consent);
- Review the adequacy of strategies, plans or programs required as a condition of approval under the project consent; and
- Recommend measures or actions to improve the environmental performance of the project, and any assessment, plan or program required under the project consent.

### 1.2

#### SCOPE AND CRITERIA

The scope of this audit includes testing of the operation's compliance with applicable regulatory conditions and requirements. The audit seeks to broadly evaluate the adequacy of strategies, plans and programs required under the project approvals, and also considers the feedback received from regulatory agencies during the audit consultation period. This audit makes recommendations to improve the environmental performance of the operation where such are deemed to be required. The scope of this audit is limited spatially to the boundaries of the project approved under planning consent 06\_0139 mod 5, as depicted within Appendix 3 of the project approval. The audit is temporally limited to the period 10<sup>th</sup> June 2015 to 1<sup>st</sup> June 2017.

KMH Environmental were commissioned by DADI to undertake an odour audit for the purpose of satisfying Clause 7(c) within Schedule 5, of the project consent:

*c) include a full odour audit of the project, taking into consideration the relevant technical guidelines and any odour complaints made since the previous audit.*

As such ERM did not contribute to the scope or execution of the odour assessment. The field odour assessment prepared by KMH Environmental is appended to this report as Annex A.

Criteria tested by this audit are derived from the following sources:

- The project approval 06\_0139 mod 5:
  - Schedule 2: Administrative Conditions
  - Schedule 3 Specific Environmental Conditions;
  - Schedule 4: Rehabilitation and Closure
  - Schedule 5: Environmental Management, Reporting & Auditing
- Environment Protection Licence (EPL) 20121 (relating to the waste processing operations);
- EPL 13426 (relating to the landfill);
- The Light Horse Business Centre Volume 1: Environmental Assessment (ERM 2008), Draft Statement of Commitments;
- Environmental Management Plans, procedures and assessments, including:
  - Aboriginal Heritage Management Plan;
  - Air Quality, Odour and Greenhouse Gas Management Plan;
  - Conveyor and Chute System Maintenance and Management Plan;
  - Landscape and Vegetation Management Plan;
  - Soil, Water and Leachate Management Plan;
  - Interim Stormwater Management Plan for the pre-sort enclosure;
  - Emergency & Fire Response Plan;
  - Rehabilitation and Closure Plan;
  - Spoil Management Plan; and
  - Waste Monitoring Program;

- The recommendations of Independent Environmental Audit (IEA) reports prepared by Cardno and dated 21 August 2015 and 12 April 2016;
- Items of particular interest / concern to regulatory agencies, as determined during the agency consultation undertaken in the course of this audit with:
  - The Department of Planning and Environment (DP&E);
  - The NSW Environment Protection Agency (EPA); and
  - Department of Primary Industries Water (DPI Water).

### 1.3

#### LIMITATIONS

This report is based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed herein are based on the currently available facts and findings within the limits of the existing data and the scope of work. The report is based on documentation reviewed and circumstances prevailing at the time this audit was conducted. The report cannot, and makes no attempt to, anticipate all changes to those conditions and circumstances, which may occur after its date of issue.

ERM points out that the findings and conclusions by ERM are predominantly based on documents and written information provided by third parties, mainly by Dial a Dump Industries and their consultants, which ERM assumes to be accurate. ERM makes no warranties or representations with respect to such information. Nothing in the report shall be construed as representation or warranty as regards merchantability in general, the saleability of a specific object for a specific price or its fitness for a specific purpose. The information and statements provided in this report are not to be construed as legal recommendations or advice.

*This Report was prepared as an IEA Report for Dial a Dump Industries Limited by ERM. The quality of information and conclusions contained herein is consistent with the level of effort involved in ERM's services, based on: i) information available at the time of preparation, ii) data supplied by outside sources, and iii) the assumptions, conditions, and qualifications set forth in this Report. Any use of this Report by any third party is at that party's sole risk.*



*2.1**APPROACH*

In the course of the audit ERM completed the following key phases of work:

1. Review of all applicable sources of regulatory obligations, including the project approval, applicable EPLs (20121 and 13426), the project Light Horse Business Centre Environmental Assessment (ERM, 2008), management plans and the recommendations of previous audits to confirm the audit criteria / regulatory obligations that would require testing in the course of the audit;
2. Prepared and distributed agency consultation letters and undertake verbal and email communication with agencies to confirm the areas of environmental concern and items particular interest to the agencies. Agency feedback was subsequently included within the audit criteria;
3. Undertake logistical and Workplace Health and Safety (WHS) planning and preparations prior to the audit site visit;
4. Undertake a two day site visit, including auditee interviews, site inspection and data transfer; and
5. Preparation of this IEA report.

*2.2**AUDIT TEAM*

This audit was undertaken on the 31<sup>st</sup> of May and the 1<sup>st</sup> of June by Mr Jolyon Peart, a Senior Consultant with ERM and an Exemplar Global accredited auditor (membership #119930). Mr Peart was supported by project technical director Mr Martin Cory. Mr Peart and Mr Cory have 10 and 15 years' of respective experience as environmental professionals. The auditees for this audit were Ms Alicia Marix-Evans and Mr Rodney Johnson of Dial a Dump Industries. Ms Marix-Evans is a solicitor with DADI and Mr Johnson is the site manager of the Genesis landfill.

The letter of endorsement for the audit team, issued by the DP&E is presented as Annex B.

*2.3**AGENCY AND STAKEHOLDER CONSULTATION*

ERM consulted with key regulatory agencies (DPE, EPA, DPI Water, OEH and Blacktown City Council) prior to the commencement of the audit, such that any areas or issues of concern to these agencies could be addressed in the audit. Agency correspondence is appended as Annex C. It is noted that the OEH did not provide any feedback, despite all reasonable enquiries. Blacktown City Council declined to identify any issues of concern.

The requests and areas of concern to regulatory agencies have been reproduced as audit criteria within Table 7 of the 'audit criteria and findings' (Annex D).

## 2.4 *ACTIONS FROM THE PREVIOUS AUDIT*

ERM has reviewed the findings and recommendations of the two-part IEA prepared by Cardno ('Independent Environmental Audit Genesis Landfill and Recycling Centre') and dated 21 August 2015 and 12 April 2016, respectively. In total ERM identified 48 recommendations arising from the previous IEA; these are reproduced in Table 8 of Annex D. ERM has reviewed these recommendations and evaluated the extent to which they have been adopted and implemented within Section 4.3 and Annex D.

## 2.5 *DOCUMENT REVIEW*

In the course of the audit ERM reviewed over 118 documents to inform an evaluation of the compliance status of the project.

These documents include:

- Environmental monitoring results;
- Annual EPL returns;
- Reports of environmental consultancies in relation to monitoring programs and the compliance of the project with regulatory requirements;
- Invoices for services rendered by contractors;
- Volumetric surveys, job and weighbridge dockets in relation to waste management;
- Correspondence between the EPA and DADI; and
- Previous audit reports.

A complete list of the documents reviewed in the course of this IEA is provided as Annex E.

## 2.6 *INTERVIEWS*

In the course of the audit ERM interviewed the auditees (Ms Marix Evans and Mr Rodney Johnson) as well as the driver of a mobile refuelling vehicle with respect to spill management. ERM also discussed the Site's monitoring programme with Dial a Dump's consultant, Mr Pablo Garces of Environ Consulting Services.

In the course of all interviews, the auditee was asked to provide their opinion on the compliance status of each criterion, in order to identify any major divergence between the views of management those of the auditor in respect to environmental performance or compliance.

## 2.7

### *NOMENCLATURE AND RATIONALE*

This IEA has been undertaken in accordance with the guidance and principles detailed within the Independent Audit Guideline - Post-approval requirements for State significant developments (NSW Government, 2015). Accordingly, the following nomenclature has been adopted to describe compliance status:

- C - Compliant;
- NT - Not Triggered;
- NOTED;
- NV - Not Verified;
- OBS - Observation;
- ANC - Administrative non-compliance; and
- NC - Non-Compliant.

In addition to the above terms, ERM has used the term 'No Finding' to describe those criteria for which the auditee has directed ERM not to make a finding, conclusion or offer advice. ERM is advised that these criteria are subject to current or future legal proceedings, which the auditee does not wish to prejudice.

ERM has adopted the term 'applicable conditions' to refer to all conditions that should have elicited a management response during the audit period. These are all conditions other than those categorised as 'Not Triggered' and 'Noted'. For the purpose of this audit, and consistent with the IEA Guideline (NSW Government, 2015) the category 'Observation' has been interpreted as an indicator of potential non-compliance or an area where performance may be improved. Observations are not considered by this audit to be non-compliances but are situations where performance could be improved. Hence recommended actions are provided for each Observation. Recommendations made by this IEA are suggested actions that are considered likely to improve environmental performance or minimise the risk of future non-compliance.

ERM have qualitatively assessed the risk posed by each non-compliance in accordance with the guidance presented in the IEA Guideline (NSW Government, 2015). A risk level: High, Medium, Low or ANC (Administrative Non-compliance) has been assigned to each incidence of non-compliance.

### 3.1 SUMMARY OF COMPLIANCE

#### 3.1.1 Environmental Protection Licences

In the course of this IEA ERM assessed the compliance of the project with respect to a total of 123 and 124 regulatory obligations, derived from EPLs 20121 and 13426 respectively. While odour related audit criteria derived from the project EPL, consent and other sources were assessed, ERM did not seek to undertake a full odour audit in accordance with Clause 7(c) Schedule 5, of the project consent.

For the applicable conditions, audit findings are:

- Compliant - 83% of conditions for EPL 20121 and 89% of conditions for EPL 13426;
- Observation – 9% of conditions for EPL 20121 and 3% of conditions for EPL 13426;
- 2% of conditions for EPL 20121 and 3% of conditions for EPL 13426 were not verified.
- Administratively non-compliant with no conditions for EPL 20121 or EPL 13426;
- No finding was offered for 2% of conditions for EPL 20121 and none for EPL 13426; and
- Non-compliant with 6% of conditions for EPL 20121 and 6% of conditions for EPL 13426.

A summary of compliance with respect to the EPL obligations is presented in Table 3.1. A detailed breakdown and discussion of the compliance status with respect to each condition of the EPLs is provided in Tables 1 and 2 of Appendix D.

**Table 3.1 Compliance Summary - EPLs**

Compliance Performance	EPL 20121	EPL 13426
Compliant	68 of 123	64 of 124
Observation	7 of 123	2 of 124
Not Verified	2 of 123	2 of 124
Not Triggered	21 of 123	37 of 124
Noted	18 of 123	15 of 124
No Finding	2 of 123	0 of 124
Administrative Non Compliance	0 of 123	0 of 124
Not Compliant	5 of 123	4 of 124

### *Project Consent*

ERM assessed compliance with respect to a total of 113 regulatory obligations, contained within Schedules 2, 3, 4 and 5 of the Project Consent 06\_0139 (Mod 5).

For the applicable conditions, audit findings are:

- Compliant with 83% of consent conditions;
- Observation – 5% of consent conditions;
- Three percent of conditions were not able to be verified
- A finding was offered for all conditions of the project consent;
- Administratively non-compliant with 2% of consent conditions; and
- Not-compliant with 7% of consent conditions.

A summary of compliance with respect to the project consent obligations is presented in Table 3.2. A detailed breakdown and discussion of the compliance status of the project with respect to each condition of consent is provided in Table 3 of Appendix D.

**Table 3.2**      ***Compliance Summary – Project Consent***

<b>Compliance Performance</b>	<b>Project Consent 06_0139</b>
Compliant	50 of 113
Observation	3 of 113
Not Verified	2 of 113
Not Triggered	45 of 113
Noted	8 of 113
No Finding	0 of 113
Administrative Non Compliance	1 of 113
Not Compliant	4 of 113

#### **3.1.2**      ***Environmental Assessment Requirements***

ERM assessed compliance with respect to a total of 38 regulatory obligations, derived from the Environmental Assessment (EA) titled *Light Horse Business Centre Volume 1: Environmental Assessment Report*, prepared by ERM in 2008. Specifically the regulatory obligations are derived from the Statement of Commitments. ERM also assessed compliance with commitments and obligations made in the assessments and reports that were prepared in 2008 in support of the EA.

For the applicable conditions, audit findings are:

- Compliant with 81% of EA conditions;
- Observation – 6% of EA conditions;
- Three percent of EA conditions were not verified;
- A finding was offered for all conditions of the EA;
- Not administratively non-compliant with any conditions; and
- Non-compliant with 9% of EA conditions.

A summary of compliance with respect to the project EA obligations is presented in Table 3.3. A detailed breakdown and discussion of the compliance status of the project is provided in Table 4, Appendix D.

**Table 3.3**      *Compliance Summary – Environmental Assessment*

Compliance Performance	Environmental Assessment
Compliant	26 of 38
Observation	2 of 38
Not Verified	1 of 38
Not Triggered	6 of 38
Noted	0 of 38
No Finding	0 of 38
Administrative Non Compliance	0 of 38
Not Compliant	3 of 38

### **3.1.3**      *EA Supporting Assessments and Reports*

ERM assessed compliance with respect to five assessments and reports prepared to support the EA (ERM, 2008). These five assessments are the only approval phase assessments believed to contain triggers for management response.

For the applicable conditions, audit findings are:

- Compliant with 67% of the EA assessments and reports conditions;
- Observation – 0% of the EA assessments and reports conditions;
- 33% of conditions were not verified;
- A finding was offered for all EA assessments and reports conditions;
- No conditions were deemed administratively non-compliant; and
- No conditions were deemed non-compliant.

A summary of compliance with respect to the project EA assessments and reports obligations is presented in Table 3.4. A detailed breakdown and discussion of the compliance status of the project is provided in Table 5, Appendix D.

**Table 3.4** *Compliance Summary – EA Assessments and Reports*

Compliance Performance	Assessments and Reports
Compliant	6 of 12
Observation	0 of 12
Not Verified	3 of 12
Not Triggered	1 of 12
Noted	2 of 12
No Finding	0 of 38
Administrative Non Compliance	0 of 12
Not Compliant	0 of 12

### 3.1.4 *Environmental Management Plan Requirements*

ERM assessed compliance with respect to a total of 68 commitments, derived from the operational phase environmental management plans.

For the applicable conditions, audit findings are:

- Compliant with 80% of management plan conditions;
- Observation – 8% of the management plan conditions;
- 2% of management plan conditions were not verified.
- A finding was offered for all EA assessments and reports conditions;
- Administratively non-compliant with 2% management plan conditions; and
- Not-compliant with 9% of management plan conditions.

A summary of compliance with respect to the project management plan requirements is presented in Table 3.5. A detailed breakdown and discussion of the compliance status of the project is provided in Table 6, Appendix D.

**Table 3.5** *Compliance Summary – Management Plans*

Compliance Performance	Environmental Management Plans
Compliant	51 of 68
Observation	5 of 68
Not Verified	1 of 68
Not Triggered	2 of 68
Noted	2 of 68
No Finding	0 of 38
Administrative Non Compliance	1 of 68

Compliance Performance	Environmental Management Plans
Not Compliant	6 of 68

### 3.2

#### *GOVERNMENT AGENCY AND STAKEHOLDER CONSULTATION*

ERM consulted with key regulatory agencies (DPE, EPA, DPI Water, OEH and Blacktown City Council) prior to the commencement of the audit, such that any areas or issues of concern to these agencies could be addressed in the audit. Agency correspondence is appended as Annex C. Issues raised by the respective agencies are discussed in detail within Table 7 of Appendix D, and summarised below.

The key issues identified by the DPI Water include:

- The rehabilitation and management of the creek and riparian vegetation in the locality of the Ropes Creek Tributary;
- The status and adequacy of the Landscape and Vegetation Management Plan;
- Compliance with the relevant water licensing requirements; and
- Soil and water management including the diversion of clean water streams away the Site.

The majority of DPI Water's comments relate to the project's Environmental Management Strategy (EMS) and Landscape and Vegetation Management Plan. ERM has reviewed these plans and confirms that much of the information requested by the DPI is contained in the plans. ERM notes that DPI Water has made a range of recommendations in respect to the plans, however it is unclear whether all of these recommendations are regulatory requirements. ERM therefore recommends that DADI engages with DPI Water to confirm the specific requirements of the department (particularly in regards to any rehabilitation requirements), and promptly revises the Landscape and Vegetation Management Plan to the satisfaction of the Department. ERM has confirmed the project is compliant with water licencing requirements and has adequate arrangements in place to divert clean water streams away from the Site.

The DP&E advised the audit should consider the following:

- Management plan requirements;
- The requirements of relevant regulatory agencies;
- The status of the operation;
- The key regulatory risks, including past or future risks;



- The predictions of environmental impact assessments;
- The performance of the operation;
- Results from previous audits;
- Any incidents or community complaints;
- Feedback received from other regulatory agencies on the performance of the operation; and
- Feedback received from the community / community consultative committee on the performance of the operation.

ERM considers that the majority of issues identified by the DP&E have been considered and addressed in the course of the audit, and findings in relation to these items are presented in the relevant sections of this IEA report. With respect to the predictions of environmental impact assessments, ERM is of the opinion that the predictions of EA are broadly consistent with site conditions experienced during the audit period.

The OEHL did not provide a response to correspondence, including after follow up phone calls. Blacktown City Council declined to identify any issues of concern.

The issues raised by the EPA are discussed in the following sub-section.

### 3.2.1 *Incidents Citations and Complaints*

In response to agency consultation the NSW EPA, ERM were provided with a list of the correspondence, incidents and citations issued during the audit period.

These include:

- Clean up notice 1549945;
- Genesis Recycling Facility – Response to Draft clean-up notice no. 1549945 (6 March 2017);
- Response to proposed remediation methodology required by Clean-Up Notice 15499455 (EPA to DADI dated 6 April 2017);
- Response to proposed Remediation Methodology Required by Clean-Up Notice 15499455 (DADI to EPA dated 15 June 2017);
- Official Caution Notice No. 1536953 – EPL No. 20121 – Breach of Licence Condition (EPA to DADI dated 12th February 2016);
- Genesis Recycling Facility – Environmental Protection Licence 20121 – Official Caution (DADI to EPA dated 19th February 2016);

- Dust and Litter Management – Environment Protection Licence No. 20121 (Advisory Letter EPA to DADI dated 16th March 2016);
- Invitation to Show Cause (ref 1545864) (EPA to DADI dated 15<sup>th</sup> December 2016);
- Genesis Waste Facility – EPL 20121. Response to Invitation to Show Cause – Suspected ACM in recycling premises (DADI to EPA dated 31<sup>st</sup> January 2017);
- Official Caution Failure to comply with Licence Condition O1.1 (EPA to DADI dated 7<sup>th</sup> September 2016);
- Genesis Waste Facility – EPL 13426 - Response to Invitation to Show Cause – Cover of Asbestos Containing Material (DADI to EPA dated 8 December 2016);
- Initiation to show cause (ref 1546716) (EPA to DADI dated 25 November 2016);
- Genesis Waste Facility – EPL 13426 – Response to Invitation to Show Cause – Waste to Queensland (QLD) (DADI to EPA dated 8<sup>th</sup> December 2016);
- Invitation to Show Cause (ref 1545838) (EPA to DADI dated 25 November 2016); and
- Invitation to show cause (ref 1546749) (EPA to DADI dated 16 Dec 2016).

These documents are reproduced within Appendix C.

Following discussion with the auditee, ERM were advised that DADI refutes the accuracy and validity of each citation, and moreover indicates they believe a number of these matters have since been resolved in their favour. Given the passage of time and the lack of information available to ERM in relation to these matters, ERM cannot confirm or disprove the validity or accuracy of all matters raised by these citations. For the purpose of this audit, ERM has linked each issue raised by the citation to the relevant EPL condition(s) and has used the correspondence / citations and the auditor's professional judgement (along with other evidence) to ascertain project's likely compliance status. Where ERM has been directed not to render a finding this is also recorded in the Audit Findings Summary (Appendix D). As such the findings presented in Table 7 of Appendix D are representative of ERM's opinion of the likely compliance status of the project relative to the EPL conditions (to the extent permitted by the constraints of the audit scope).

In summary:

- Condition 01.1 - ERM finds that the project is generally managed in a competent manner, and was not able to identify any information directly

related to Clean Up Notice 1549945 / Show Cause Letter 1545864 sufficient to overturn this finding;

- Condition L3.3 - ERM finds that the project has measures in place and implemented to identify and prevent the acceptance of any waste not permitted by condition, and was not able to identify any information directly related to Clean Up Notice 1549945/ Show Cause Letter 1545864 sufficient to overturn this finding;
- ERM has been directed by the auditee to report 'no finding' in relation to EPL condition L3.1 as raised by Clean Up Notice 1549945 and Show Cause Letter 1545864 ; and
- In relation to other matters raised by the EPA, ERM was unable to obtain sufficient documentary evidence to support these findings.

### 3.3

#### *RECOMMENDATIONS FROM PREVIOUS AUDITS*

The previous IEA prepared in two parts (2015 and 2016) by Cardno contains a total of 44 recommendations. ERM has assessed the degree to which these recommendations have been addressed and implemented during the audit period.

The project is deemed to be compliant with 71% of recommendations and non-compliant with 20% of recommendations, the latter being incomplete or not actioned since the last audit. Observations (neither compliant nor non compliant findings) were made for 7% of recommendations. All applicable conditions were verified and one administrative non-compliance was observed.

A summary of compliance with respect to the previous IEA recommendations is presented in Table 3.6. A detailed breakdown and discussion of the compliance status of the project is provided in Table 8 of Appendix D.

**Table 3.6** *Compliance Summary – Previous Audit Recommendations*

<b>Compliance Performance</b>	<b>Previous Audit</b>
Compliant	29 of 41
Observation	3 of 41
Not Verified	0 of 41
Not Triggered	0 of 41
Noted	0 of 41
No Finding	0 of 38
Administrative Non Compliance	1 of 41
Not Compliant	8 of 41

Overall environmental compliance on the project has been assessed at 81% compliance with applicable conditions. The most relevant environmental considerations for the Site are as follows:

- Air quality / dust;
- Noise emissions;
- Odour emissions;
- Surface water management;
- Groundwater and leachate management;
- Waste and hazardous materials management; and
- Ecology, biodiversity and heritage management.

#### *Emissions Management*

Data and information reviewed by ERM in the course of this audit suggests that dust, noise, odour emissions and surface water discharges from the Site have been generally within regulatory limits during the audit period. Management of these environmental aspects is therefore considered to represent an acceptable level of environmental performance. Despite some adverse measurements during the audit period, groundwater quality appears to have stabilised to acceptable levels and is not considered to be an issue of concern during the audit period.

#### *Waste Management*

Waste management has been identified by the NSW EPA as a key issue of concern during the audit period. In particular, the transportation of waste from the Site to third party recycling and landfill facilities has the potential to pose a compliance risk where such facilities fail to recycle the waste and instead elect to divert it to landfill. While this practice has not been evidenced by ERM during the audit period, enhanced record keeping may be warranted in order to mitigate the risk of non-compliance in the future.

The potential for asbestos to bypass checking mechanisms and enter finished granular products (eg sand, gravel) continues to pose a risk for the site. While not attributable to deliberate actions of Client, the identification of asbestos in feedstock stockpiles by the NSW EPA is illustrative of this risk. It is noted that the project is taking steps to mitigate this risk. Specifically DADI have acquired a number of microPHAZIR™ AS Asbestos analyser tools, which are understood to be capable of in-field screening and identification of asbestos. ERM expects these tools to improve detection rates for asbestos in incoming materials and minimise the risk of asbestos being present in finished products.

Nevertheless, ongoing diligence will be required to ensure an unacceptable risk is not posed to end users of these products.

#### *Biodiversity and Heritage Management*

The project restricts access to the 'conservation area' in which ecological receptors and Sites of Aboriginal heritage significance are located and as such significant adverse impacts on these receptors are not believed to have occurred during the audit period. Historic access to the conservation area has left disturbance in the form of bicycle tracks which warrant rehabilitation. Similarly DPI Water has expressed interest in the status of land rehabilitation activities on the riparian land adjacent to the Ropes Creek tributary. ERM is unaware of any rehabilitation having being undertaken on the Site during the audit period.

Feral animal control is not undertaken on the Site and elevated populations of predators (principally foxes) continue to pose a risk to the ecology of the Site. While weed control has been undertaken within the conservation area during the audit period, these control efforts do not appear to have been informed by a weed monitoring programme. As such it cannot be demonstrated that the weed control activities currently undertaken have been effective.

#### *Environmental Management*

In respect to environmental management more generally the internal environmental plans, procedures and records reviewed by ERM do not always illustrate a clear pathway from the the identification of environmental issues through to their rectification and (if need be) reporting to the regulator. Furthermore a scarcity of reported environmental incidents on the internal incident register is such that ERM has been unable to evaluate the adequacy of management's response to environmental incidents generally.

Since the previous IEA (undertaken in 2015), the execution of the majority of the environmental monitoring activities has been consolidated. Specifically the groundwater, leachate, surface water and dust monitoring as well as miscellaneous environmental checking and inspections are now undertaken by the same environmental consulting firm. This is considered likely to improve the consistency of monitoring and reporting and also ensure that environmental professionals are present on site to provide coverage for environmental incidents and issues as they arise.

#### *Future Compliance Risks*

Environmental aspects that have presented a compliance risk at the Site during the audit period (and which are likely to continue to present a compliance risk) include:

- Surface water and erosion / sediment control, including prompt flocculation and dewatering of sediment basins following rainfall events;

- Environmental management and specifically the potential for a disconnect between environmental monitoring and the implementation of management actions to ameliorate environmental impacts or minimise the risk of future impacts; and
- Access by members of the public to the conservation area and the potential for land degradation from recreational activities in this area.

### 3.5

#### *ENVIRONMENTAL RISK*

ERM has qualitatively evaluated the risk posed by each of the non-compliances identified by this audit, consistent with the IEA Guidelines (NSW Government, 2015).

In general, risks identified in the course of this audit were low or administrative in nature. In total the following risk levels were assigned at a rate of:

- Administrative Non-Compliance risk level – 3 incidences;
- ‘Low’ risk level – 30 incidences;
- ‘Medium’ risk level – 4 incidences;
- ‘High’ risk level – one instance.

The medium risk levels were assigned to the identified presence of asbestos in finished product feedstock, and the potential for asbestos impacted products to be used for landscaping purposes in the public domain. The high risk was assigned to a lack of geotechnical slip monitoring on the site however it is noted that this is a safety risk not an environmental risk. This is a qualitative assessment which has not been made in accordance with the risk assessment methodology of the IEA guideline.

### 3.6

#### *CONTINUAL IMPROVEMENT*

The auditor has observed significant improvements in environmental performance on the project since 2013. The environmental management plans and procedures used on the Site are up to date and generally fit for purpose. In addition, a range of formalised checking and inspection programs have been implemented on the Site since the last IEA. These are expected to contribute to improved performance provided the information is promptly assessed and used to inform environmental management.

It is expected that the recent consolidation of environmental monitoring programs (eg groundwater, leachate, surface water and dust) under the management of one environmental consultancy will allow for more

consistency in monitoring, reporting and a more integrated approach to environmental management generally.

The implementation of new tools and procedures (such as the microPHAZIR™ AS asbestos analyser) are expected to deliver continued environmental improvement.

### 3.7 *ADEQUACY OF EXISTING PLANS AND PROCEDURES*

ERM has undertaken a high level review of all strategies, plans or programs required under approval 06\_0139. These strategies, plans and programs are the:

- Aboriginal Heritage Management Plan;
- Air Quality, Odour and Greenhouse Gas Management Plan;
- Conveyor and Chute System Maintenance and Management Plan;
- Landscape and Vegetation Management Plan;
- Soil, Water and Leachate Management Plan;
- Interim Stormwater Management Plan for the pre-sort enclosure;
- Emergency Management Manual;
- Rehabilitation and Closure Plan;
- Spoil Management Plan; and
- The Waste Monitoring Program.

ERM has evaluated the adequacy of these plans with respect to the Management Plan Requirements detailed in the Condition 2, Schedule 5 of the project consent. This is detailed within Table 6 of Annex D.

In summary ERM is of the opinion that in general the major components required of each plan were present and the plans were fit for purpose. The auditor notes that the Emergency Management Manual is not a management plan, and does not address the requirements of the consent 06\_0139 Schedule 5, Condition 2. Where relevant, opportunities for improvement are identified in Table 6 (Annex D).

## CONCLUSIONS

ERM undertook an Independent Environmental Audit at the Genesis Landfill and Recycling Centre on the 31<sup>st</sup> of May and the 1<sup>st</sup> of June 2017. ERM found the project to have variable levels of compliance against the varying and different sources of regulatory obligations:

- 83% and 89% compliance with EPL conditions for EPL20121 and 13426 respectively;
- 83% compliance with project consent conditions;
- 81% compliance with the Environmental Assessment conditions;
- 67% compliance with the obligations contained within the reports prepared to support the EA;
- 80% compliance with management plan requirements; and
- 71% adoption of previous IEA recommendations.

The audit covered the period between the 10<sup>th</sup> of June 2015 and the 1<sup>st</sup> June 2017. Consistent with the existing project consent a follow up IEA will be required for the Site in June 2019.



Annex A

# KMH Environmental Ambient Field Odour Assessment

20 March 2017

Pablo Garces  
Senior Environmental Engineer  
Environ Consulting Services  
On behalf of Dial-A-Dump-Industries (DADI)  
Honeycomb Drive, Eastern Creek NSW

Via email: [pablog@ecs.sydney](mailto:pablog@ecs.sydney)

Dear Pablo

## **RE: Genesis Xero Waste Facility Boundary Field Ambient Odour Assessment**

The Genesis Xero Waste Facility receives sorted and unsorted waste that is distributed to the specific waste streams for over 80% recovery and recycling. The residual waste is transferred to a deep void space as the end-of-pipe disposal option. The site is licensed to accept up to 2 million tonnes of waste per year. As per the Dial-A-Dump-Industries (DADI) website<sup>1</sup>, The following types of waste are accepted:

- General Rubbish (mixed waste)
- Concrete
- Brick
- Asphalt (No Coal Tar)
- Timber (must be clean & recyclable)
- Green Waste
- Tree Stumps
- Mattresses
- Tyres

It is specifically noted that no putrescible waste materials are processed at this site other than what may be contained within the general rubbish stream. The Environmental Protection Licence (EPL) 20121 (version dated Sept 2015) applies to the management of the site and an odour assessment is to be undertaken to comply with section M7.2 and M7.3 of the EPL during the month of February 2017. A boundary field ambient odour assessment (FAOA) is to be undertaken as per prescribed methods.

Section M7.2 of the EPL requires that an annual audit of the design, operation and odour management practices is undertaken with all audit recommendations implemented.

Section M7.3 of the EPL requires conducting assessments to identify the extent of any potentially offensive odour emissions beyond the boundary of the site.

The scope of this odour assessment project included review of, and any required revision to, air dispersion modelling based on site specific meteorological and terrain conditions (level 2) considering the site emissions data which is currently underway. This report describes an assessment of the site's odour potential, recommendations and the FAOA report.

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<sup>1</sup> <http://www.dadi.com.au/recycling-landfill/genesis-eastern-creek>

## FAOA Summary

KMH/**pitt&sherry** engaged Stephenson Environmental Management Australia (SEMA) to undertake the necessary field odour assessment as they have access to the relevant technology required by the EPL and as they have site familiarity from similar reporting in the past. Their report is attached to this letter.

The EPL requires well-designed field investigations as per the German Standard (in the absence of a specific Australian Standard, the German Standard VDI 3940 (1993) is generally adopted for determination of odour levels in ambient air by field inspections) and/or employment of a Nasal Ranger Field Olfactometer by a calibrated field operator. The Nasal Ranger Field Olfactometer is used to report odour levels as Dilution-to-Threshold (D/T) number, which is comparable in value to odour unit (OU) measurements or relatable to readings on VDI 3882.1 intensity scale.

As per NSW Department of Environment and Conservation (DEC) odour assessment guidelines, (EPA 2001<sup>2</sup>), impact criteria for complex mixtures of odour air pollutants for urban communities as ground level concentration (GLC) is to be 2OU (odour units per cubic metre at 99<sup>th</sup> percentile, nose response time average). The FAOA undertaken on the 17<sup>th</sup> February 2017 indicate that the boundary odour levels were within this range. The exceptions to this were noted inside the boundaries and at the bottom of the landfill void and at the timber yard where the readings were higher. It is noted that these odour levels were localized within the facility, especially at the timber yard, and were not detected downwind at the boundary, therefore the site was compliant at the time of the FAOA with the NSW EPA impact assessment criteria.

It is noted that the assessment findings are limited to the prevailing conditions as encountered on site on the day of the site visit. This would mean the findings pertain to normal site operations and may not represent changes in the site conditions such as major operational disturbances or highly inclement weather.

## Site Operations, Complaints Register and Odour Sources

The Genesis Xero site predominantly receives inert materials and general rubbish. While specific material stream quantities have not been assessed as part of this project, it is generally surmised that materials expected to generate extensive offensive odour such as Class 3 organics (putrescible) are not processed at this site. The receipt and processing of waste are undertaken in covered and semi-enclosed environments while some stockpiling is undertaken (large items, timber yard etc). The chute that transports the materials to the deep void is not expected to release odour or dust during the process.

KMH/**pitt&sherry** reviewed information in the publicly available complaints register (updated monthly and containing information from January 2010) and no odour-related complaints have been registered since September 2016. Considering no putrescible waste is handled at the Genesis site, the actions (including responses to EPA) and comments listed in the register for odour related complaints previously (24<sup>th</sup> August 2016, 27-28 June 2015, 2 July 2014 etc) are considered acceptable.

Weekly observational environmental monitoring checklists completed by ECS at the Genesis site were reviewed for January. The checklists have been completed on 6<sup>th</sup>, 9<sup>th</sup>, 20<sup>th</sup> and 29<sup>th</sup> January 2017. As per these site inspection reports, there have been no offensive odours being emitted from the site. An earthy odour has been reported at the admin building (not at the boundary) on the early hours of 6<sup>th</sup> January, assessed to originate from the timber yard and not reported as offensive. It is noted that heavy incidence of dust had been noted on the 18<sup>th</sup> January with possible reasons attributed to hot/dry and windy conditions. It is understood that this has not contributed to any odour complaints.

It is observed that the odour management practices by containment and regular observation/inspections have yielded positive outcomes and should be continued.

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<sup>2</sup> EPA 2001, *Technical Notes – Draft Policy: Assessment and Management of Odour from Stationary Sources in NSW*, NSW Environment Protection Authority, Sydney.

## Air Dispersion Model

KMH/pitt&sherry reviewed information contained in various assessments reports and the previous air dispersion model reports applicable to the site, as listed below:

- Pacific Env Ltd 2016 – odour report was for TNG EfW DA, not yet operational
- Pacific Env Ltd 2014 – odour monitoring report for Genesis site
- EMS Appendix odour and GHG management plan
- ERM – Light Horse BC DA 2008 – Air Quality Odour and Dust report
- Cardno / The Odour Unit – FAOA August 2015 – date of survey 10 June 2015
- Stephenson – FAOA report May 2016 – date of survey 29 February 2016

Based on this review, we conclude that there is no new information that would change the modeling inputs. Predictive modeling relies on representative data inputs. While the field surveys allow validation of the modeling predictions, they do not provide new modeling input data. Our understanding is that there have not been any significant changes to the plant, processes, site layout, or types of feed materials processed on site. There is no new management data that would improve or change the modelling assumptions about the location and geometry of the odour sources and the odour emissions rates, which is what the modeling relies on. Any repeat modeling would therefore generate the same predictions as before, and would incur unnecessary expenditure. We therefore recommend not redoing the modeling at this time. Should new odour source data become available or if process, equipment or feed stock changes are made at some later time, we would be happy to update the modeling then as a separate engagement, the cost of which would be of a similar order to what we offered this time.

## Odour Assessment and Recommendations

Based on the available information and field assessment, it is concluded that odour has not been / is not anticipated to be a matter of concern for the site. The current odour management systems appear to be satisfactory for the purpose under normal operations with no change in the waste streams received.

Yours sincerely,



**Dr Avanish Panikkar**  
**Senior Engineer and Project Manager**  
**KMH/pitt&sherry**



**Doug Ford**  
**Noise and Air Specialist**  
**pitt&sherry**

*Encl.* Field Ambient Odour Assessment – Site Boundary report by Stephenson Environmental Management Australia

Annex B

## Audit Team Endorsement

**Industry Assessments**

Contact: Kelly McNicol

Phone: (02) 9274 6236

Email: [kelly.mcnicol@planning.nsw.gov.au](mailto:kelly.mcnicol@planning.nsw.gov.au)

Mr Jolyon Peart  
Senior Environmental Consultant  
Environmental Resources Management Australia Pty Ltd  
Locked Bag 3012  
Australia Square NSW 1215

Your ref: 0397513 L01  
Genesis IEA DP&E  
Our ref: MP 06\_0139

[Jolyon.peart@erm.com](mailto:Jolyon.peart@erm.com)

Dear Mr Peart

**Genesis Waste Management Facility (MP 06\_0139)  
Independent Environmental Audit - Audit Team Endorsement**

I refer to your correspondence of 8 March 2017 seeking approval to appoint an audit team to undertake the independent environmental audit (IEA) in accordance with Condition 7 of Schedule 5 of Project Approval MP 06\_0139.

The Department has reviewed the details of the nominated audit team from Environmental Resources Management Australia Pty Ltd, comprising:

- Jolyon Peart, Senior Environmental Consultant (Lead Auditor);
- Martin Cory, Partner; and
- Wills Brassil, Environmental Consultant.

The Department is satisfied that the audit team is sufficiently qualified and experienced to conduct the audit and hereby endorses the team in accordance with Condition 7 of Schedule 5 of Project Approval MP 06\_0139. This endorsement is conditional upon the team's independence from the project.

Please ensure the IEA includes the following:

- a compliance table indicating the compliance status of each condition of project approval (and any other statutory instruments required to be audited);
- avoidance of terms such as 'partial compliance', and use 'compliance', 'non-compliance' or 'inability to be determined';
- recommended actions in response to any non-compliances; and
- opportunities for improved environmental management and performance.

Finally, the Department recommends that you:

- review the IEA report to ensure it complies with the relevant conditions of project approval, prior to submitting the report to the Secretary; and
- submit an action plan to the Department detailing your response to the recommendations and timeframes outlined in the audit report to implement any adopted recommendations.

Please note that this approval does not relate to the scope of the audit required by Condition 7 of Schedule 5 of Project Approval MP 06\_0139 as requested in the letter. This matter has been referred to the Department's Compliance section for further review.

Should you wish to discuss the above, please contact Mr Kelly McNicol, Team Leader, on the above details.

Yours sincerely



Chris Ritchie

**Director**

**Industry Assessments**

as delegate of the Secretary

30/3/17

## Annex C

# Agency Consultation Correspondence



Department of Planning and Environment  
Sydney Region West  
10 Valentine Ave, Parramatta NSW 2150  
via mail and email:  
GPO Box 39, Sydney NSW 2001  
[metroparra@planning.nsw.gov.au](mailto:metroparra@planning.nsw.gov.au)

*Our Reference: 0397513 L01 Genesis IEA DP&E*

**Attention: The Secretary, Department of Planning and Environment**

Dear Ms McNally,



**RE: GENESIS LANDFILL INDEPENDENT ENVIRONMENTAL AUDIT**

I write in relation to an Independent Environmental Audit (IEA) proposed for the Genesis Landfill and Recycling facility at Honeycomb Drive, Eastern Creek. The requirement for the audit is triggered by Condition 7 of development consent 06\_0139. The previous audit was undertaken by Cardno in 2015 and reported in the document 'Independent Environmental Audit Genesis Landfill and Recycling Centre', dated August 2015.

Specifically I write in order to:

- (a) seek endorsement by the Secretary for the proposed audit team;
- (b) outline the proposed audit scope; and
- (c) seek the input of the Department with respect to the audit scope.

#### Audit Team

ERM proposes the following team to undertake the audit:

- Project Technical Director – Mr Martin Cory;
- Lead Auditor – Mr Jolyon Peart (Mr Peart holds Exemplar Global accreditation and performed the previous IEA at this facility in an audit leadership role);
- Audit support – Mr Wills Brassil.

The audit team would draw upon the expertise of auditors within the wider ERM performance assurance team where required.

### Audit Scope

Consistent with Section 2.2 of the Independent Audit Guideline (NSW Government, October 2015), ERM propose to apply a risk based approach to determining the audit scope. We would focus our audit on compliance with ongoing regulatory requirements, and would exclude a number of conditions that have previously been assessed and deemed compliant, which have not changed since the previous audit.

Specifically, ERM would assess compliance with respect to:

- The project Conditions of Approval (Schedule 3 of consent 06\_0139);
  - Excluding Conditions 6 – 11, the reasoning for this being the landfill planning and leachate management are mature systems the details of which have previously been submitted the DP&E, and which have not been substantially altered since previous audits.
  - Excluding Condition 12 as no composting has been undertaken during the audit period.
  - Excluding Condition 21 through 25, as the Soil, Water and Leachate Management Plan, Erosion and Sediment Control Plan and Stormwater Management Scheme were prepared and approved by the Secretary prior to the commencement of construction on the site. Compliance with the monitoring requirements of Condition 25(i) would be tested by the audit.
  - Excluding the entirety of Traffic, Transport & Access section, these conditions being largely related to the planning and construction phases of the development, and have little bearing on the environmental performance of the facility.
  - Schedule 4, as this is yet to be triggered.
- Obligations contained within the Statement of Commitments of the Environmental Assessment titled Light Horse Business Centre Volume 1: Environmental Assessment Report (ERM, 2008);
- Conditions contained within EPL 20121;

- Excluding L4 Noise Limits, as there have been no noise complaints since operations began in 2012.
- Excluding Condition O6.14, O6.15 and O6.16, as no composting has been undertaken during the audit period.
- Conditions contained within EPL 13426;
  - Excluding L4 Noise Limits, as there have been no noise complaints since operations began in 2012.
  - Excluding Conditions O5.11, O5.12 E7.1 & E7.2, the reasoning for this being the landfill planning and leachate management are mature systems the details of which have previously been submitted to the DP&E (and/or the EPA), and which have not been altered since previous audits.
  - Excluding Conditions O5.19 through O5.21, the reasoning being that the landfill is not near the end of its lifespan and these conditions are as such not triggered at this time.
- Any items of particular interest to relevant agencies and organisations arising from consultation with:
  - NSW DP&E;
  - NSW Environment Protection Agency;
  - NSW DPI Water;
  - Office of Environment and Heritage; and
  - Blacktown City Council.
- Conditions within Environmental Management Plans, consisting of:
  - Soil, Water and Leachate Management Plan;
  - Stormwater Management Plan;
  - Spoil Management Plan;
  - Air Quality, Odour and Greenhouse Gas Management Plan;

- Landscape and Vegetation Management Plan;
- Aboriginal Heritage Management Plan.
- Conditions within assessments and other plans:
  - Bushfire Hazard Assessment (Holmes Fire And Safety, 31 July 2008);
  - Heritage Conservation Strategy For Aboriginal Sites;
  - Light Horse Business Centre Noise Impact Assessment (ERM, 2008); and
  - The Traffic Impact Assessment.

An odour assessment has recently been undertaken at the site by KMH Environmental in February 2017, and we would incorporate the findings of this assessment into the IEA.

#### Independence of the Audit Team

ERM can confirm that the audit team meet the independence criteria of Section 3.3 of the IEA Guideline.

#### Timing

ERM have scheduled the audit for the 22nd and 23rd of March 2017, and we appreciate your prompt response to this correspondence via post or email.

Email:

*Jolyon.peart@erm.com*

Post:

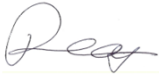
*Jolyon Peart*

*ERM*

*Locked Bag 3012*

*Australia Square NSW 1215 AUSTRALIA*

Yours,

A handwritten signature in black ink, appearing to read 'Jolyon Peart', written over a thin horizontal line.

Jolyon Peart  
for Environmental Resources Management Australia Pty Ltd

## Jolyon Peart

---

**From:** Chase Dingle <Chase.Dingle@planning.nsw.gov.au>  
**Sent:** Thursday, 25 May 2017 2:55 PM  
**To:** Jolyon Peart  
**Cc:** 'Alicia Marix-Evans'  
**Subject:** RE: Scope Review - Genesis Landfill IEA  
**Attachments:** L01 Genesis IEA Department of Planning and Environment.pdf

Hi Jolyon,

Apologies for the delay in getting you a response and I trust this finds you well.

I have considered your attached submission regarding the scope of the independent environmental audit for the Genesis Landfill, and can advise you that the Department expects that all conditions of Project Approval 06\_0139 relevant to the audit period be assessed. Additionally, the audit shall consider the following:

- management plan requirements;
- the requirements of relevant regulatory agencies;
- the status of the operation;
- the key regulatory risks, including past or future risks;
- the predictions of environmental impact assessments;
- the performance of the operation;
- results from previous audits;
- any incidents or community complaints;
- feedback received from other regulatory agencies on the performance of the operation; and
- feedback received from the community / community consultative committee on the performance of the operation.

With regards to the scope of the audit against any relevant EPL, the Department expects that you consult the EPA as the appropriate regulatory authority.

Many thanks,

Chase Dingle

### Chase Dingle

Team Leader – Compliance  
Department of Planning & Environment  
23 - 33 Bridge Street, Sydney NSW 2000  
T 02 9228 6403 | M 0467963379  
E [chase.dingle@planning.nsw.gov.au](mailto:chase.dingle@planning.nsw.gov.au)



---

**From:** Jolyon Peart [<mailto:jolyon.peart@erm.com>]  
**Sent:** Wednesday, 24 May 2017 9:46 AM  
**To:** Chase Dingle <[Chase.Dingle@planning.nsw.gov.au](mailto:Chase.Dingle@planning.nsw.gov.au)>  
**Cc:** Alicia Marix-Evans <[AliciaMarix-Evans@dadi.com.au](mailto:AliciaMarix-Evans@dadi.com.au)>  
**Subject:** Scope Review - Genesis Landfill IEA

Hi Chase,

Further to our conversation this morning, it would be most appreciated if you would provide comment / endorsement of the attached request to modify the scope of the proposed.

Kind regards

Jolyon Peart  
Senior Consultant

**ERM**

Level 15 | 309 Kent Street | Sydney, NSW 2000 |

**T** +61 02 8584 8815 | **M** 0478 179 657

**E** [Jolyon.Peart@erm.com](mailto:Jolyon.Peart@erm.com) | **W** [www.erm.com](http://www.erm.com)



**ERM** *The business of sustainability*

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Please visit ERM's web site: <http://www.erm.com>

Environment Protection Authority  
PO Box A290  
Sydney South NSW 1232  
Via post and email: [planning.matters@epa.nsw.gov.au](mailto:planning.matters@epa.nsw.gov.au)

*Our Reference: 0397513 L02 Genesis IEA EPA*

**Attention: The Chief Environmental Regulator**

Dear Mr Gifford,



**RE: GENESIS LANDFILL INDEPENDENT ENVIRONMENTAL AUDIT**

I write in relation to an impending Independent Environmental Audit (IEA) proposed for the Genesis Landfill and Recycling facility, Honeycomb Drive Eastern Creek. The audit is triggered by development consent 06\_0139, and is required on a two yearly basis. The previous audit was undertaken by Cardno in 2015 and reported in the document 'Independent Environmental Audit Genesis Landfill and Recycling Centre', dated August 2015.

I specifically invite the EPA to review the audit scope outlined below, and to nominate any issues, concerns or items of particular interest that they would like to see included within the scope.

### Audit Scope

Consistent with Section 2.2 of the Independent Audit Guideline (NSW Government, October 2015), ERM propose to apply a risk based approach to determining the audit scope. We would focus our audit on compliance with ongoing regulatory requirements, and would exclude a number of conditions that have previously been assessed and deemed compliant and which have not changed since the previous audit.

Specifically, ERM would assess compliance with respect to:

- The project Conditions of Approval (Schedule 3 of consent 06\_0139);
  - Excluding Conditions 6 – 11, the reasoning for this being the landfill planning and leachate management are mature systems the details of



which have previously been submitted the DP&E, and which have not been substantially altered since previous audits.

- Excluding Condition 12 as no composting has been undertaken during the audit period.
- Excluding Condition 21 through 25, as the Soil, Water and Leachate Management Plan, Erosion and Sediment Control Plan and Stormwater Management Scheme were prepared and approved by the Secretary prior to the commencement of construction on the site. Compliance with the monitoring requirements of Condition 25(i) would be tested by the audit.
- Excluding the entirety of Traffic, Transport & Access section, these conditions being largely related to the planning and construction phases of the development, and have little bearing on the environmental performance of the facility.
- Schedule 4, as this is yet to be triggered.
- Obligations contained within the Statement of Commitments of the Environmental Assessment titled Light Horse Business Centre Volume 1: Environmental Assessment Report (ERM, 2008);
- Conditions contained within EPL 20121;
  - Excluding L4 Noise Limits, as there have been no noise complaints since operations began in 2012.
  - Excluding Condition O6.14, O6.15 and O6.16, as no composting has been undertaken during the audit period.
- Conditions contained within EPL 13426;
  - Excluding L4 Noise Limits, as there have been no noise complaints since operations began in 2012.
  - Excluding Conditions O5.11, O5.12 E7.1 & E7.2, the reasoning for this being the landfill planning and leachate management are mature systems the details of which have previously been submitted to the DP&E (and/or the EPA), and which have not been altered since previous audits.

- Excluding Conditions O5.19 through O5.21, the reasoning being that the landfill is not near the end of its lifespan and these conditions are as such not triggered at this time.
- Any items of particular interest to relevant agencies and organisations arising from consultation with:
  - NSW DP&E;
  - NSW Environment Protection Agency;
  - NSW DPI Water;
  - Office of Environment and Heritage; and
  - Blacktown City Council.
- Conditions within Environmental Management Plans, consisting of:
  - Soil, Water and Leachate Management Plan;
  - Stormwater Management Plan;
  - Spoil Management Plan;
  - Air Quality, Odour and Greenhouse Gas Management Plan;
  - Landscape and Vegetation Management Plan;
  - Aboriginal Heritage Management Plan.
- Conditions within assessments and other plans:
  - Bushfire Hazard Assessment (Holmes Fire And Safety, 31 July 2008);
  - Heritage Conservation Strategy For Aboriginal Sites;
  - Light Horse Business Centre Noise Impact Assessment (ERM, 2008); and
  - The Traffic Impact Assessment.

An odour assessment has recently been undertaken at the site by KMH Environmental in February 2017, and we would incorporate the findings of this assessment into the IEA.

Timing

ERM have scheduled the audit for the 22<sup>nd</sup> and 23<sup>rd</sup> of March 2017, and we appreciate your prompt response to this correspondence via post or email.

Email:

*Jolyon.peart@erm.com*

Post:

*Jolyon Peart*

ERM

*Locked Bag 3012*

*Australia Square NSW 1215 AUSTRALIA*

Yours,

A handwritten signature in black ink, appearing to read 'Jolyon Peart', is written over a yellow horizontal line.

Jolyon Peart  
for Environmental Resources Management Australia Pty Ltd



Our reference : DOC17/157462-02  
EPA Contact : Louis Scipione

Mr Jolyon Peart  
ERM Australia Pty Ltd  
Locked Bag 3012  
Australia Square  
NSW 1215

**EMAIL AND STANDARD POST**  
**17 March 2017**

Dear Mr Peart

### **Genesis Xero Waste facility - Independent Environmental Audit**

I refer to your letter dated 8 March 2017 regarding an Independent Environmental Audit (IEA) proposed for the Genesis Landfill and Recycling Facility to satisfy Schedule 5, Condition 7 of Project Approval 06\_0139 (as modified).

The Environment Protection Authority (EPA) has reviewed your letter and provides you with the following response regarding a review of the audit scope and nomination of issues, concerns or items of particular interest for consideration to be included in the scope.

#### **Issues and Items of Concern**

##### **Recycling Facility (EPL 20121)**

In the course of site inspections and regulating the Genesis Recycling Facility at Eastern Creek, the EPA has concerns with the following issues during the current IEA period from 10 June 2015;

- During an inspection on 1 March 2017 asbestos sheeting was observed in the unprocessed stockpile in the Material Processing Centre (MPC). It was explained by the Licensee there is difficulty in determining what is and what isn't asbestos in incoming loads. Relates to conditions O1.1, L3.1 and L3.3.
- There have been two observations of dust emanating from within the MPC building and on a separate occasion dust migrating offsite from vehicle movements on internal roadways and from excavator use. Related to conditions O3.1 and 3.2.
- During a recent site inspection in March 2017 sediment and mud was being tracked on Honeycomb Drive. Dust was being created as trucks drove through the drying sediment. Related to conditions O3.1, O3.2 and O5.5.
- There have been observations of painted and engineered wood in the processed mulch stockpiles in the timber section of the recycling facility. Relating to clause 91 and 93 of the *Protection of the Environment Operations Act 1997* (the "POEO Act").

- Asbestos has been found in the unprocessed stockpile of brick and concrete wastes, this raises questions regarding the quality control and checking the loads as they arrive. This applies to all incoming building and demolition waste received at the site. Related to conditions O1.1, L3.1 and L3.3.
- Asbestos fragments have been found in processed 20mm aggregate material from crushing and sorting the brick and concrete feedstock stockpiles. Related to condition O1.1.
- There has been historical operational issues with dust being generated from internal traffic and no dust suppression measures or water carts working. Related to conditions O3.1, O3.2 and O3.4.

### **Landfill Facility (EPL 13426)**

In the course of site inspections and regulating the Genesis Landfill Facility (EPL 13426) at Honeycomb Drive at Eastern Creek, the EPA has concerns with the following issues since the previous IEA period from 10 June 2015;

- On two separate occasions asbestos contaminated soil has been observed being unloaded and compacted with no application of initial cover. Related to conditions O1.1 and O5.4
- Warning signage in the asbestos disposal area has been absent on two separate occasions. Related to condition O1.1
- The water cart was not operating in the landfill void when asbestos soils were being unloaded. The asbestos contaminated soil was being unloaded then moved by front end loader and again moved by excavator to a stockpile. Related to condition O1.1
- Asbestos fragments have been observed on numerous occasions at the surface in the General Solid Waste ("GSW") disposal area. Related to condition O1.1 and O5.6
- There have been concerns relating to not applying end of day cover appropriately. Related to condition O1.1
- EPA Officers have observed the suspected exhuming of waste from within the landfill and taking offsite. Related to conditions L3.3 and O5.3 and O5.9.
- There have been complaints and concerns of odours on the premises migrating offsite. Related to condition L7.1
- During a recent site inspection in March 2017 sediment and mud was being tracked along Honeycomb Drive and creating dust clouds as trucks drove through the drying sediment. Related to condition O4.4.
- Suspected land application of wood waste (not meeting the mulch exemptions) was observed in a vacant block directly to the north of the recycling facility but outside the Licence boundary. Related to condition O5.9

### **Scope of Work Review**

The EPA has reviewed the Scope of Works and has the following comments:

At the time of writing on 15 March 2017 the complaints register on the Genises' website was last updated on 30 November 2016. On the register it is said to be updated monthly. The EPA is unaware of any recent complaints since the register was last updated.

The EPA agrees with the proposed scope of works to cover all operational issues and Licence conditions contained with EPL 20121 and EPL13426.

If you have any further questions regarding this matter please contact Louis Scipione on 02 9995 5826.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. Sheehy', with a stylized flourish at the end.

**Greg Sheehy**  
**Director Waste Compliance**  
**Environment Protection Authority**



# Show Cause Letter

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Licence - 20121



Dial-A-Dump (EC) Pty Ltd  
ABN 76 115 345 769  
PO BOX 1040  
MASCOT NSW 2017

Our Reference      1545864  
File Number        SF13/4442  
Date                 15 December 2016

Dear Mr Malouf,

## Invitation to Show Cause

Dial-A-Dump (EC) Pty Ltd ("the Licensee") is the holder of Environment Protection Licence No. 20121 ("the Licence") issued under the *Protection of the Environment Operations Act 1997* (the "POEO Act"). The licence authorises the carrying out of activities at the Genesis Recycling Facility located at Honeycomb Drive, EASTERN CREEK, NSW, 2766 ("the Premises").

The NSW Environment Protection Authority (the "EPA") refers to an inspection undertaken at the Premises on Tuesday 18 October 2016. During the inspection, Authorised EPA Officers (the "Officers") identified a potential breach of section 64 of the POEO Act and non-compliances of Licence conditions O1.1, L3.3 and L3.4. The EPA now invites you to provide a written submission in relation to the alleged offences including but not limited to any defence and/or mitigating circumstances.

## BACKGROUND

On Tuesday 18 October 2016 the Officers conducted an inspection of the Premises. The Officers were on the Premises between approximately 10:00am to 12:50pm and were met by Mr Graham Cunningham (the "Site Manager").

During the inspection a piece of potential asbestos containing material was observed on the surface of the brick recycling feeder stockpile (Attachment A). This stockpile was to be fed into the crushing machine and processed to form saleable aggregate. The Officers collected one sample that was sent for further testing to a NATA accredited laboratory. The results of this sample were received on 9 November 2016 and were reported as containing chrysotile and amosite asbestos.

While undertaking the inspection a skip bin was dropped off in the brick feeder stockpile and the material unloaded was not inspected before the truck left the Premises. The processing plant was stopped while the Officers inspected the stockpiled material. No other visible pieces of fibrous cement material were observed.

# Show Cause Letter

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Licence - 20121



The EPA notes that correspondence dated 19 October 2016 was issued to the Licensee requiring actions to be taken in this area to restrict access until deemed safe with a clearance certificate from a suitably qualified environmental hygienist and to provide photographic and documentary evidence of these actions. The EPA notes that these requirements were met in the agreed time frame (correspondence dated 21 October 2016) and documentation was provided in evidence of this.

## LEGISLATIVE REQUIREMENTS

### 1. Section 64 (1) of the POEO Act states -

*"if any condition of a licence is contravened by any person, each holder of the licence is guilty of an offence."*

### 2. EPL Licence Condition O1.1 states -

*"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, re-processing, transport and disposal of waste generated by the activity."*

### 3. Condition L3.3 states -

*The applicant must have in place and implement procedures to identify and prevent the acceptance of any waste not permitted by condition L3.1 to be accepted at the premises.*

### 4. Condition L3.4 states -

*"No asbestos waste is to be accepted or stored at the premises".*

## INVITATION TO SHOW CAUSE

The EPA views the acceptance of asbestos containing material in the recycling area and lack of inspections of incoming loads as the Licensee failing to carry out these activities in a competent manner. The purpose of this letter is to invite the Licensee to explain, in writing, why the EPA should not take regulatory action in response to the potential breach of section 64 of the POEO Act in respect to Licence conditions O1.1, L3.3 and L3.4. Your letter should provide any information, fact, or circumstance that you would like the EPA to consider when deciding whether to take further action in relation to the potential breach.

Any submissions you wish to make must be provided to:



# Show Cause Letter

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Licence - 20121



Director Waste Compliance

EPA

PO Box A290

Sydney South NSW 1232

or electronically to [waste.compliance@epa.nsw.gov.au](mailto:waste.compliance@epa.nsw.gov.au)

and received no later than **5pm on Friday 13 January 2017.**

Further information on the EPA's approach to compliance and enforcement can be found in the EPA's Compliance Policy at <http://www.epa.nsw.gov.au/legislation/130251epacompl.htm>

Should you have any queries in relation to the above please contact Louis Scipione on 9995 5826.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ruth Owler'.

**Ruth Owler**

**Unit Head**

**Waste Compliance**

**Environment Protection Authority**

# Show Cause Letter

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Licence - 20121



## Attachment A- Photographs



**Photograph 1:** Location where asbestos containing material was found.



**Photograph 2:** Close up of where asbestos containing material was observed.

# Show Cause Letter

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Licence - 20121



Dial-A-Dump (EC) Pty Ltd  
ABN 76 115 345 769  
PO BOX 1040  
MASCOT NSW 1460

Our Reference      1546749  
File Number        EF13/4138  
Date                 16-Dec-2016

Dear Mr Malouf

## Invitation to show cause

Dial-A-Dump (EC) Pty Ltd ("the Licensee") is the holder of Environment Protection Licence No. 20121 ("the Licence") issued under the *Protection of the Environment Operations Act 1997* (the "POEO Act"). The Licence authorises the carrying out of activities at the Genesis Recycling Facility located at Honeycomb Drive, EASTERN CREEK, NSW, 2766 (the "Premises").

I am writing to inform you that the Environment Protection Authority (the "EPA") believes the Licensee has potentially breached section 64 (1) of the POEO Act and Licence conditions L3.1 and L3.3. The EPA now invites you to provide a written submission in relation to the alleged offences including but not limited to any defence and/or mitigating circumstances.

## BACKGROUND

On Monday 14 November 2016 EPA Authorised Officers (the "Officers") were informed by another licensed site that the company engages Dial-A-Dump (EC) Pty Ltd for processing their Recycled Asphalt Profiles (RAP). Asphalt is a separate category of waste as listed in the POEO Act and is not listed on the Licence at condition L3.1 as a waste category that is permitted to be received at the Premises for processing.

## LEGISLATIVE REQUIREMENTS

1. Section 64 (1) of the POEO Act states -

*"If any condition of a licence is contravened by any person, each holder of the licence is guilty of an offence. "*

2. Licence condition L3.1 states -

*"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. 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*

# Show Cause Letter

Licence - 20121



*below. Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below. This condition does not limit any other conditions in this licence".*

Code	Waste	Description	Activity	Other Limits.
NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time.	Resource recovery Waste storage	Limited to bricks, concrete, metal, glass, plastic and sandstone or a combination of the above.

Condition L3.3 States -

*"The applicant must have in place and implement procedures to identify and prevent the acceptance of any waste not permitted by condition L3.1 to be accepted at the premises".*

The EPA views the acceptance and processing of RAP as a potential breach of the POEO Act and Licence conditions L3.1 and L3.3.

## INVITATION TO SHOW CAUSE

The purpose of this letter is to invite Dial-A-Dump (EC) Pty Ltd to explain, in writing, why the EPA should not take regulatory action in response to the potential breach of section 64(1) of the POEO Act and Licence conditions L3.1 and L3.4 in relation to receiving and processing waste that is not permitted in the Licence. Your letter should provide any information, fact, or circumstance that you would like the EPA to consider when deciding whether to take further action in relation to the non-conformance of licence conditions.

Any submissions you wish to make must be provided to:

Director Waste Compliance  
EPA  
PO BOX A290  
South Sydney 1232

and received no later than **5pm on Friday 13 January 2017**

# Show Cause Letter

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Licence - 20121



Further information on the EPA's approach to compliance and enforcement can be found in the EPA's Compliance Policy at <http://www.epa.nsw.gov.au/legislation/130251epacompl.htm>

Should you have any queries in relation to the above please contact Louis Scipione on 9995 5826.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Ruth Owler', written in a cursive style.

**Ruth Owler**

**Unit Head**

**Waste Compliance**

**Environment Protection Authority**



# Official Caution

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Licence - 13426



Dial-A-Dump (EC) Pty Ltd  
ABN 76 115 345 769  
PO BOX 1040  
MASCOT NSW 1460

Attention: Mr Ian Malouf

Notice Number 1542460  
File Number EF13/4137  
Date 07-Sep-2016

Dear Mr Malouf

## OFFICIAL CAUTION

### Failure to comply with Licence Condition O1.1

DIAL-A-DUMP (EC) Pty Ltd (the "Licensee") hold Environment Protection Licence No. 13426 (the "Licence") under the *Protection of the Environment Operations Act 1997* (the "POEO Act"). The Licence authorises the carrying out of scheduled activities of Waste Disposal (application to land) including asbestos waste and Waste Storage at Honeycomb Drive Eastern Creek (the "Premises").

On Friday 28 August 2015, authorised officers (the "Officers") inspected the Premises to assess the management of asbestos disposal. During the inspection the Officers observed broken pieces of suspected Asbestos Containing Material ("ACM") spread across the asbestos disposal area ("ADA"). This included visible fragments under fresh tracks from a compactor used in the ADA. Fragments were sampled, analysed at a NATA accredited laboratory and has been confirmed to contain asbestos.

The Officers consider that the ACM was being disposed of and managed in an inappropriate manner that was unsafe, inappropriate and inconsistent with requirements laid out in the *Protection of the Environment Operations (Waste) Regulations 2014*, the Licence and the POEO Act.

The EPA issued the Licensee with a Show Cause letter on 7 December 2015, providing an opportunity to give reasons for the non-compliance with the legislation.

The Licensee provided information regarding the incident indicating procedures were in place, however explained that wet weather preceding the date of inspection and the use of the Tana compactor in the area may have contributed to the issues resulting to the uncovered asbestos in the ADA. The Licensee further noted that the compaction process itself often causes some fragments to become exposed and they believe the purpose of the additional end of day cover required by the regulation is precisely to address that issue.

PO Box A290 Sydney South NSW 1232  
59-61 Goulburn St Sydney NSW 2000  
Tel: (02) 9995 5700 Fax: (02) 9995 5922  
TTY (02) 9211 4723  
ABN 43 692 285 758  
[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)

# Official Caution

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Licence - 13426



## THE OFFENCE

The EPA has reasonable grounds to believe that the Licensee has contravened Section 64(1) of the POEO Act by breaching Licence Condition O1.1.

Condition O1.1 of the Licence states:

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

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

Section 64(1) states:

*"1) Offence*

*If any condition of a licence is contravened by any person, each holder of the licence is guilty of an offence."*

## EPA DECISION

The EPA has decided on this occasion to issue the Licensee with an Official Caution for an offence against s 64 (1) of the POEO Act.

The EPA has considered the Licensee's response and in this instance has decided not to initiate criminal proceedings. The EPA has reviewed the submission, and does not consider that the Licensee has given sufficient reasons for the non-compliance.

The EPA understands that the rainfall experienced from 23-26 August 2015, was not dissimilar from previous years. In fact similar rainfall occurs approximately on a monthly basis. The EPA would expect that the regular incidence of this type of rainfall should be accounted for in the Licensee's management plan.

Furthermore the EPA considers that the use of a compactor in an asbestos disposal area is not required to compact cover applied to asbestos waste as this may in fact cause asbestos to break into smaller fragments. This should be accounted for in Licensee's management plan. If the Licensee proposes to use a compactor and asbestos is exposed then they are still required to ensure that the exposed asbestos material has the required cover applied as per *clause 80 of the Protection of the Environment Operation (waste) Regulation 2014*.

The EPA views any breach of environment protection legislation as a serious matter. The maximum penalty for a breach of s64(1) in the case of a corporation is \$1,000,000 and in the case of a continuing offence a further \$120,00 for each day the offence continues.

In these circumstances, and having regard to the *Attorney General's Caution Guidelines under the Fines Act 1996*, the EPA considers it appropriate to issue Dial-A-Dump (EC) Pty Ltd with this Official Caution for the alleged offence.

# Official Caution

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Licence - 13426



Please note that EPA will retain a copy of this Official Caution on file. If Dial-A-Dump (EC) Pty Ltd commits an offence in future, EPA may take into account this Official Caution in determining the most appropriate enforcement action. Such action may involve the issue of a penalty notice or the commencement of a prosecution.

The issuing of this Official Caution does not prevent EPA from taking alternative enforcement action for the alleged offence, if it becomes apparent that an alternative response is more appropriate.

If you have any questions or wish to discuss this matter, please contact EPA officer Jennifer Rowe on (02) 9995 5883.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ruth Owler'.

**Ruth Owler**

**Unit Head**

**Waste & Resource Recovery**

**Environment Protection Authority**



## PHOTOGRAPHS



Photograph 1: An overview of the asbestos that was not adequately covered in the Asbestos Disposal Area. Note: Broken Asbestos fragments on the surface and evidence a compactor had driven over the area.



Photograph 2: An overview of the asbestos that was not adequately covered in the Asbestos Disposal Area. Note: Broken Asbestos fragments on the surface and evidence a compactor had driven over the area.





Photograph 3: An overview of more exposed asbestos located on the surface of the Asbestos Disposal Area that was not adequately covered.



Photograph 4: An overview of the asbestos disposal area.





DOC16/137616

Mr Ian Malouf  
Dial-A-Dump (EC) Pty Ltd  
PO Box 1040  
MASCOT NSW 1460

## STANDARD POST AND EMAIL

Dear Mr Malouf,

### **Dust and Litter Management – Environment Protection Licence No. 20121**

Dial-A-Dump (EC) Pty Ltd is the holder of Environment Protection Licence No.20121 ("the Licence") issued under the *Protection of the Environment Operations Act 1997* ("the Act") for a facility located at Honeycomb Drive, Eastern Creek NSW 2766 ("the Premises").

### **Compliance Program**

During November 2015, the NSW Environment Protection Authority ("EPA") commenced a compliance program to examine dust and litter management at licenced waste facilities. The purpose of this compliance program was to assess each licensee's compliance with operating conditions *O1 Activities must be carried out in a competent manner*, with respect to preventing dust emissions and windblown litter.

### **Site Inspection**

On 3 December 2015, EPA Authorised Officers inspected the Premises as part of the dust compliance program. Prior to arrival at the Premises, EPA Officers observed significant dust being generated from truck and excavator movements on unsealed roads on site. This appeared to be migrating off site. No dust suppression was observed in operation at this time.

During the site inspection, officers observed dust generated from vehicle movements on unsealed roads. In addition hard stand areas were covered in a fine sediment, and dust was observed to be generated from internal traffic on these surfaces.

EPA Officers were informed that the site's water cart was not in operation due to a blown tyre, an alternate water cart was available down in the landfill. The working water cart was not observed operating on the licenced Premises during the site inspection. No alternative control measures were being implemented to prevent or minimise the generation of dust from traffic on internal roads.

### **Licence Requirements**

Operating conditions of the Licence state:

*"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."

"O3. 1 The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises."

"O3.2 The licensee must ensure that all activities conducted at the premises are carried out in a manner which minimises or prevents the generation of dust."

### **Follow Up Action**

In this instance, the EPA is issuing an advisory letter to remind Dial-A-Dump (EC) Pty Ltd of its obligation to comply with Licence conditions and legislative requirements relating to dust and air pollution.

In addition, to ensure compliance with Conditions O1.1 of the Licence, the EPA requires that Dial-A-Dump (EC) Pty Ltd reviews its dust management procedures to ensure every effort is made to comply with the conditions of the Licence. This should include, but not be limited to, proactively control dust generation and emissions from internal traffic at the Premises and regular maintenance of plant and equipment.

The EPA will continue to undertake announced and unannounced inspections of the Premises to ensure compliance with Licence conditions. Should the issues identified above not have been addressed adequately, the EPA may consider taking regulatory action.

If you have any questions in relation to this matter please contact Melissa Ward on (02) 9995 5747.

Yours sincerely

 16/3/2016

**STEVEN JAMES**  
**Unit Head Waste Compliance**  
**NSW Environment Protection Authority**

Date of Complaint	Summary of Complaint Issues	Matter Investigated	Matter Resolved or Outstanding	Measures Taken	Date Measures Taken
30/11/2016	Nil	N/A	N/A	N/A	N/A
31/10/2016	Nil	N/A	N/A	N/A	N/A
30/09/2016	Nil	N/A	N/A	N/A	N/A
24/08/2016	<b>Odour</b> EPA received a call alleging that at approximately 10:30am there was a sewer like odour in Minchinbury.	Yes	Yes	The Licence-holder investigated practices at the site and confirmed (to the EPA) that the offensive odour in the area did not originate from the Genesis facility. Normal activities of recycling and landfilling non-putrescible waste, in accordance with EPL conditions were being undertaken but at a reduced volume due to the wet weather.	24/08/2016 to 25/08/2016
31/07/2016	Nil	N/A	N/A	N/A	N/A
30/06/2016	Nil	N/A	N/A	N/A	N/A
31/05/2016	Nil	N/A	N/A	N/A	N/A
30/04/2016	Nil	N/A	N/A	N/A	N/A
31/03/2016	Nil	N/A	N/A	N/A	N/A
29/02/2016	Nil	N/A	N/A	N/A	N/A
31/01/2016	Nil	N/A	N/A	N/A	N/A
31/12/2015	Nil	N/A	N/A	N/A	N/A
30/11/2015	Nil	N/A	N/A	N/A	N/A
31/10/2015	Nil	N/A	N/A	N/A	N/A
30/09/2015	Nil	N/A	N/A	N/A	N/A
31/08/2015	Nil	N/A	N/A	N/A	N/A
31/07/2015	Nil	N/A	N/A	N/A	N/A
27/06/2015	<b>Odour</b> After hours call to EPA @ 19h50 advising of	Yes	Yes	The Licence-holder investigated practices at the site on 27 and 28 June 2015 and	29/06/2015 to 09/07/2015

# GENESIS FACILITY, EASTERN CREEK COMPLAINTS REGISTER (updated monthly)



Date of Complaint	Summary of Complaint Issues	Matter Investigated	Matter Resolved or Outstanding	Measures Taken	Date Measures Taken
	<p>overpowering smell, making caller and family feel unwell. Caller alleged it appeared to be coming from Dial-A-Dump.</p> <p>EPA officer reported odour on 28/06/2015 @ 19h30 in the vicinity of Eastern Creek and expressed view it may have been generated from the Genesis premises.</p>			<p>confirmed (to the EPA) that the offensive odour in the area did not originate from the Genesis facility.</p> <p>The Genesis facility was closed at the time of the complaint to the EPA environment line and on 23 June 2015. However, as part of the investigation, onsite security guards and independent parties entering and exiting the site preceding and post those dates have been contacted and confirmed no evidence of odour at the Genesis premises. One of the transport companies highlighted the offensive odour at the intersection of Old Wallgrove Road and Wallgrove Road Eastern Creek.</p> <p>No issues have occurred with the management of leachate at the Genesis Facility.</p>	
31/05/2015	Nil	N/A	N/A	N/A	N/A
30/04/2015	Nil	N/A	N/A	N/A	N/A
31/03/2015	Nil	N/A	N/A	N/A	N/A
28/02/2015	Nil	N/A	N/A	N/A	N/A
31/01/2015	Nil	N/A	N/A	N/A	N/A
31/12/2104	Nil	N/A	N/A	N/A	N/A
30/11/2014	Nil	N/A	N/A	N/A	N/A
31/10/2014	Nil	N/A	N/A	N/A	N/A
30/09/2014	Nil	N/A	N/A	N/A	N/A
31/08/2014	Nil	N/A	N/A	N/A	N/A
02/07/2014	<p><b>Odour</b></p> <p>After hours call to EPA @ 22h00 advising of pungent smell like rotting food coming across the landfill site in Eastern Creek. The wind direction is South Easterly and</p>	Yes	Yes	<p>On 7 July 2014 when Licence-holder was advised of complaint an investigation was undertaken which confirmed there has been no odour arising from the landfill. All dams, leachate tanks and the mulch area are</p>	7/07/2014



Date of Complaint	Summary of Complaint Issues	Matter Investigated	Matter Resolved or Outstanding	Measures Taken	Date Measures Taken
	caller alleged it appears to be coming from Dial-A-Dump.			routinely inspected daily. South East of our site is another waste facility that accepts food however on this day there was no odour coming across our site.	
30/06/2014	Nil	N/A	N/A	N/A	N/A
31/05/2014	Nil	N/A	N/A	N/A	N/A
30/04/2014	Nil	N/A	N/A	N/A	N/A
31/03/2014	Nil	N/A	N/A	N/A	N/A
28/02/2014	Nil	N/A	N/A	N/A	N/A
31/01/2014	Nil	N/A	N/A	N/A	N/A
31/12/2013	Nil	N/A	N/A	N/A	NA/
30/11/2013	Nil	N/A	N/A	N/A	N/A
4/10/2013	<b>Shuddering</b> A Minchinbury Representative advised several residents in Barossa Drive, Minchin Drive and side streets off those roads had experienced shuddering in their homes the previous two nights between 9.30 pm and 10.30 pm.	Yes	Yes	Licence-holder investigated complaint and confirmed no major or extraordinary activity was undertaken on the site. Possibility of seismic activity in the area as reported in the media.	4/10/2013
30/09/2013	Nil	N/A	N/A	N/A	N/A
31/08/2013	Nil	N/A	N/A	N/A	N/A
31/07/2013	Nil	N/A	N/A	N/A	N/A
30/06/2013	Nil	N/A	N/A	N/A	N/A
31/05/2013	Nil	N/A	N/A	N/A	N/A
11-12/04/2013	<b>Odour</b> Local residents complain of a 'chemical-like' / 'garbage-like' odour in the St Clair and Erskine Park area on evening of 9 April 2013. EPA contact a number of facilities to	Yes	Yes	Licence-holder investigated complaint and confirmed (to EPA) that no odour of that description left the facility. Senior manager (local to the area) observed strong 'garbage-like' odours from another facility in the St	11-12/04/2013

**GENESIS FACILITY, EASTERN CREEK  
COMPLAINTS REGISTER (updated monthly)**

Date of Complaint	Summary of Complaint Issues	Matter Investigated	Matter Resolved or Outstanding	Measures Taken	Date Measures Taken
	ascertain cause.			Clair area on the evening of 9 April 2013 not in the vicinity of the licence-holder's facility.	
31/03/2013	Nil	N/A	N/A	N/A	N/A
18/02/2013	<b>Odour</b> A Minchinbury Resident advised they had noticed an odour from Sydney Water sewer vent pipes following a heavy rain event and had been advised that it may be sewage from Genesis.	Yes	Yes	Investigated incident and reviewed leachate treatment practices.	18/02/2013
31/01/2013	Nil	N/A	N/A	N/A	N/A
31/12/2012	Nil	N/A	N/A	N/A	N/A
30/11/2012	Nil	N/A	N/A	N/A	N/A
30/09/2012	Nil	N/A	N/A	N/A	N/A
31/08/2012	Nil	N/A	N/A	N/A	N/A
31/07/2012	Nil	N/A	N/A	N/A	N/A
30/06/2012	Nil	N/A	N/A	N/A	N/A
31/05/2012	Nil	N/A	N/A	N/A	N/A
30/04/2012	Nil	N/A	N/A	N/A	N/A
31/03/2012	Nil	N/A	N/A	N/A	N/A
29/02/2012	Nil	N/A	N/A	N/A	N/A
31/01/2012	Nil	N/A	N/A	N/A	N/A
31/12/2011	Nil	N/A	N/A	N/A	N/A
30/11/2011	Nil	N/A	N/A	N/A	N/A
31/10/2011	Nil	N/A	N/A	N/A	N/A
30/09/2011	Nil	N/A	N/A	N/A	N/A
31/08/2011	Nil	N/A	N/A	N/A	N/A
31/07/2011	Nil	N/A	N/A	N/A	N/A
30/06/2011	Nil	N/A	N/A	N/A	N/A
31/05/2011	Nil	N/A	N/A	N/A	N/A
30/04/2011	Nil	N/A	N/A	N/A	N/A

Date of Complaint	Summary of Complaint Issues	Matter Investigated	Matter Resolved or Outstanding	Measures Taken	Date Measures Taken
31/03/2011	Nil	N/A	N/A	N/A	N/A
09/02/2011	<b>Noise</b> Minchinbury Resident advised LHBC of single loud banging noise in the early morning, sounded like dump truck door banging.	Yes	Yes	Review of site daily reports regarding construction progress. <ul style="list-style-type: none"> <li>Premises best described as building site with concrete pouring of footings and laying of drain pipes. No construction work undertaken after 6.00pm each work day Monday to Friday.</li> <li>Site is locked and secured when Site personnel not present.</li> <li>No waste is being received at premises.</li> </ul>	10 February 2011 Email to Resident, as we were unable to reach them by telephone.
01/01/2011	Nil	N/A	N/A	N/A	N/A
31/12/2010	Nil	N/A	N/A	N/A	N/A
30/11/2010	Nil	N/A	N/A	N/A	N/A
31/10/2010	Nil	N/A	N/A	N/A	N/A
30/09/2010	Nil	N/A	N/A	N/A	N/A
31/08/2010	Nil	N/A	N/A	N/A	N/A
31/07/2010	Nil	N/A	N/A	N/A	N/A
30/06/2010	Nil	N/A	N/A	N/A	N/A
31/05/2010	Nil	N/A	N/A	N/A	N/A
30/04/2010	Nil	N/A	N/A	N/A	N/A
31/03/2010	<b>Noise</b> Minchinbury Resident advised Dept. of Planning this has been ongoing since Christmas.	Yes	Yes	Stage 1 works recommenced on LHBC site on or about 4 March 2010 with Contractors working strictly within approved operating hours; limited works undertaken prior to this date. Other site works in the neighbourhood have been ongoing since the New Year.	1 April 2010 Offer to Dept. of Planning for Site Manager to meet with complainant and facilitate site visit.
28/02/2010	Nil	N/A	N/A	N/A	N/A
31/01/2010	Nil	N/A	N/A	N/A	N/A



**GENESIS FACILITY, EASTERN CREEK  
COMPLAINTS REGISTER (updated monthly)**



# Show Cause Letter

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Licence - 13426



Dial-A-Dump (EC) Pty Ltd  
ABN 76 115 345 769  
PO BOX 1040  
MASCOT NSW 2017

Our Reference      1545838  
File Number        EF13/8238  
Date                 25-November-2016

Dear Mr Malouf,

## Invitation to Show Cause

The NSW Environment Protection Authority (the "EPA") refers to an inspection undertaken at Dial-A-Dump (EC) Pty Ltd ("the Licensee") referred to as Genesis Landfill at Honeycomb Drive, Eastern Creek NSW 2766 (the "Premises") on Tuesday 18 October 2016. During the inspection EPA Authorised Officers (the "Officers") identified suspected non-compliances of Environment Protection Licence No. 13426 (the "Licence") condition O1.1.

I am writing to inform you that the EPA believes the Licensee has breached section 64 (1) of the *Protection of the Environment Operations Act 1997* (the "POEO Act") for non compliance with Licence condition O1.1. The EPA now invites you to provide written submission in relation to the alleged offences including but not limited to any defence and/or mitigating circumstances.

## BACKGROUND

The EPA is responsible for the administration and enforcement of the POEO Act and is the appropriate regulatory authority in relation to the Licence and the Premises. The Licence authorises the carrying out of scheduled activities of "Waste Disposal (application to land)" at the Premises and is issued to the Licensee under the POEO Act.

On 18 October 2016, the Officers carried out an unannounced inspection of the Premises. The Officers arrived at the Premises at approximately 10:00am to inspect operational requirements at the landfill and finished onsite at approximately 12:50pm.

During the inspection the Officers were escorted around the Premises by Mr Graham Cunningham (the "site manager"). At the time of inspection the weather conditions were dry and windy.

The Officers made the following observations of the landfilling activities at the Premises:

- A. Activities at the landfill included numerous trucks unloading at the tip face in the eastern portion of the Premises. While observing activities the Officers observed numerous fragments of fibrous cement suspected to be asbestos containing material in a previously laid General Solid Waste ("GSW") area

# Show Cause Letter

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Licence - 13426



(Attachment A, photograph 1). Four samples were collected for testing at a NATA accredited laboratory. The fibrous cement material was found to be visible on the surface and had been compacted as evidenced by the roller tracks around the broken fragments. The samples were sent to a NATA accredited laboratory for further testing and all samples were reported as containing chrysotile and/or amosite asbestos.

- B. Trucks were unloading soil material at the tip face during the site inspection. The Officers undertook a visual inspection of material that was freshly laid and found numerous fragments of fibrous cement suspected of being asbestos containing material (Attachment A, photograph 2). Two samples were collected for testing at a NATA accredited laboratory and both samples were reported as containing chrysotile and/or amosite asbestos. This material was in the process of being compacted during the inspection.
- C. After the fibrous cement fragments were found the site manager explained that this location is possibly the hazardous materials area, although there were no visible signs in the vicinity. The material being compacted with observed asbestos containing material was not being inspected and appeared to be dry as there was no water cart wetting this area down while compaction activities were taking place.
- D. The dedicated asbestos disposal area was located approximately 50 meters to the north of this location and was adequately sign posted. There was no waste observed being dropped off in this area at the time of the inspection.
- E. The EPA notes that correspondence dated 19 October 2016 was issued to Dial-A-Dump (EC) Pty Ltd requiring actions to be taken in this area to restrict access to the areas where asbestos was observed until deemed safe with a clearance certificate from a suitably qualified environmental hygienist and to provide photographic and documentary evidence of these actions. The EPA notes that these requirements were met in the agreed time frame (correspondence dated 21 October 2016) and documentation was provided in evidence of this.

The EPA views the landfilling and compacting of uncovered and exposed asbestos containing material in the GSW tipping area and tipping face as a breach of section 64(1) of the POEO Act and section 80(4) of the POEO (waste) regulation. The EPA believes that landfilling and inspection activities are not being carried out in a competent manner and is a potential breach of Licence condition O1.1.

## LEGISLATIVE REQUIREMENTS

1. Section 64 (1) of the POEO Act states -

*"if any condition of a licence is contravened by any person, each holder of the licence is guilty of an offence."*

2. Section 80 (4) of the POEO (Waste) Regulation states -

*"The occupier of a landfill site must ensure that asbestos waste disposed of at the site is covered with virgin excavated natural material or (if expressly authorised by an environment protection licence held by the occupier) other material:*

*(a) initially (at the time of disposal), to a depth of at least 0.15 metres, and*

*(b) at the end of each day's operation, to a depth of at least 0.5 metres, and*

*(c) finally, to a depth of at least 1 metre (in the case of bonded asbestos material or*

# Show Cause Letter

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Licence - 13426



*asbestos-contaminated soils) or 3 metres (in the case of friable asbestos material) beneath the final land surface of the landfill site."*

3. Condition O1.1 states -

*"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, re-processing, transport and disposal of waste generated by the activity."*

## INVITATION TO SHOW CAUSE

The purpose of this letter is to invite Dial-A-Dump (EC) Pty Ltd to explain, in writing, why the EPA should not take regulatory action in response to the potential breach section 64(1) of the POEO Act for non compliance with Licence condition O1.1 in regards to the disposal of asbestos waste not being carried out in a competent manner and potential breach of section 80(4) of the POEO (waste) regulation in regards to inadequate covering of asbestos waste. Your letter should provide any information, fact, or circumstance that you would like the EPA to consider when deciding whether to take further action in relation to the breach.

Please send all correspondence to [waste.operations@epa.nsw.gov.au](mailto:waste.operations@epa.nsw.gov.au) or to the Director Waste Compliance, EPA, PO BOX A290, Sydney South, 1232 by no later than **5pm on Friday 9 December 2016**.

Further information on the EPA's approach to compliance and enforcement can be found in the EPA's Compliance Policy at <http://www.epa.nsw.gov.au/legislation/130251epacompl.htm>

Should you have any queries in relation to the above please contact Louis Scipione on 9995 5826.

Yours sincerely

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

**Ruth Owler**

**Unit Head**

**Waste Compliance**

**Environment Protection Authority**



# Show Cause Letter

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Licence - 13426



## Attachment A - Photographs



**Photograph 1:** Location of asbestos containing material in the general solid waste tipping area.



**Photograph 2:** Location of asbestos containing material at the tip face where waste was being compacted.



# Show Cause Letter

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Licence - 13426



Dial-A-Dump (EC) Pty Ltd  
ABN 76 115 345 769  
PO BOX 1040  
MASCOT NSW 1460

Our Reference      1546716  
File Number       EF13/4137  
Date                25-November-2016

Dear Mr Malouf,

## Invitation to show cause

The NSW Environment Protection Authority (the "EPA") refers to observations made at Dial-A-Dump (EC) Pty Ltd ("the Licensee") referred to as Genesis Landfill at Honeycomb Drive, Eastern Creek NSW 2766 (the "Premises"). On Monday 14 November 2016 EPA Authorised Officers and a Workcover Officer (the "Officers") observed suspected non-compliances of Environment Protection Licence No. 13426 (the Licence) conditions L3.3, O5.3 and O5.9.

I am writing to inform you that the EPA believes the Licensee has potentially breached section 64 (1) of the *Protection of the Environment Operations Act 1997* (the "POEO Act"). The EPA now invites you to provide a written submission in relation to the alleged offences including but not limited to any defence and/or mitigating circumstances.

## BACKGROUND

On 14 November 2016 at approximately 11:30am, the Officers observed numerous trucks being loaded with material from within the tip face area of the landfill. The Officers observed a front end loader moving waste material from the tip face to an excavator that was loading the trucks. The trucks were seen to be turning around and exiting the landfill and climbing the haul road to the top of the Premises. The Officers observed the actions from outside of the Premises at the southern boundary.

At Approximately 11:50am Mr Graham Cunningham (the "site manager") arrived at the location where the Officers were making observations on the southern boundary and inquired as to the intentions of the Officers. The Officers explained that they were in the vicinity of the Premises and decided to stop and look at the operations. The Officers then inquired about the loading of the trucks in the landfill void and the reasons for the waste material leaving the site. The site manager explained that the material was being sent for further processing at an alternative waste facility at W2R. The site manager explained the material was from the MPC and came to the landfill via the chute.

On 15 November 2016 at approximately 2:50pm EPA Officer Louis Scipione called the site manager to inquire about the possible breach of licence conditions. The site manager said that the material that was

# Show Cause Letter

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Licence - 13426



being loaded was from the MPC and was brought down by the chute. The material was said to be typical MPC waste material that could not be further processed. The site manager said that the waste material that is being loaded onto trucks is being transported to an alternate landfill facility called greenspot that is located in Queensland. The EPA views this as a potential breach of section 64(1) of the POEO Act as there is non compliance with Licence conditions L3.3, O5.3 and O5.9 and is considering taking regulatory action against Dial-A-Dump (EC) Pty Ltd.

## LEGISLATIVE REQUIREMENTS

### 1. Section 64 (1) of the POEO Act states -

"If any condition of a licence is contravened by any person, each holder of the licence is guilty of an offence."

### 2. Condition L3.3 states -

"Except for the following, the Proponent shall dispose of all outputs produced from the waste processing and/or resource recovery facility on site, subject to Environment Protection Licence 20121, to the Landfill:

- a) Recyclable's extracted and delivered off-site for resource recovery purposes;
- b) Hazardous wastes extracted from the input waste stream and lawfully disposed of off-site; and
- c) Output waste derived materials approved for use under the *Protection of the Environment Operations Act, 1997* and Regulations."

### 3. Condition O5.3 states -

"The licensee must not exhume any landfilled waste at the premises unless written approval is given by the EPA".

### 4. Condition O5.9 states -

"The licensee must only dispose of waste within the landfill void".

## INVITATION TO SHOW CAUSE

The purpose of this letter is to invite Dial-A-Dump (EC) Pty Ltd to explain, in writing, why the EPA should not take regulatory action in response to the potential breach of section 64(1) of the POEO Act and licence conditions L3.3, O5.3 and O5.9. Your letter should provide any information, fact, or circumstance that you would like the EPA to consider when deciding whether to take further action in relation to the possible breach.

Further, in its response, the Licensee should set out the steps it is taking to ensure future compliance.

Any submissions you wish to make must be provided to: The Director Waste Compliance, EPA, PO BOX A290, South Sydney, 1232 or electronically to [waste.operations@epa.nsw.gov.au](mailto:waste.operations@epa.nsw.gov.au)

and received no later than **5pm on 9 December 2016**.

# Show Cause Letter

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Licence - 13426



Further information on the EPA's approach to compliance and enforcement can be found in the EPA's Compliance Policy at <http://www.epa.nsw.gov.au/legislation/130251epacompl.htm>

Should you have any queries in relation to the above please contact Louis Scipione on 9995 5826.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Ruth Owler'.

**Ruth Owler**

**Unit Head**

**Waste Compliance**

**Environment Protection Authority**

Department of Primary Industries - Water  
Level 10, Macquarie Tower  
Locked Bag 5123  
Parramatta NSW 2124  
Via post and email: [water.enquiries@dpi.nsw.gov.au](mailto:water.enquiries@dpi.nsw.gov.au)

*Our Reference: 0397513 L03 Genesis IEA DPI Water*

**Attention: The Director General**

Dear Mr Hansen,



**RE: GENESIS LANDFILL INDEPENDENT ENVIRONMENTAL AUDIT**

I write in relation to an impending Independent Environmental Audit (IEA) proposed for the Genesis Landfill and Recycling facility, Honeycomb Drive Eastern Creek. The audit is triggered by development consent 06\_0139, and is required on a two yearly basis. The previous audit was undertaken by Cardno in 2015 and reported in the document 'Independent Environmental Audit Genesis Landfill and Recycling Centre', dated August 2015.

I specifically invite the DPI Water to review the audit scope outlined below, and to nominate any issues, concerns or items of particular interest that they would like to see included within the scope. I note that the operator of the facility does not hold any licences issued by DPI Water.

Audit Scope

Consistent with Section 2.2 of the Independent Audit Guideline (NSW Government, October 2015), ERM propose to apply a risk based approach to determining the audit scope. We would focus our audit on compliance with ongoing regulatory requirements, and would exclude a number of conditions that have previously been assessed and deemed compliant and which have not changed since the previous audit.

Specifically, ERM would assess compliance with respect to:

- The project Conditions of Approval (Schedule 3 of consent 06\_0139);
  - Excluding Conditions 6 - 11, the reasoning for this being the landfill planning and leachate management are mature systems the details of

which have previously been submitted the DP&E, and which have not been substantially altered since previous audits.

- Excluding Condition 12 as no composting has been undertaken during the audit period.
- Excluding Condition 21 through 25, as the Soil, Water and Leachate Management Plan, Erosion and Sediment Control Plan and Stormwater Management Scheme were prepared and approved by the Secretary prior to the commencement of construction on the site. Compliance with the monitoring requirements of Condition 25(i) would be tested by the audit.
- Excluding the entirety of Traffic, Transport & Access section, these conditions being largely related to the planning and construction phases of the development, and have little bearing on the environmental performance of the facility.
- Schedule 4, as this is yet to be triggered.
- Obligations contained within the Statement of Commitments of the Environmental Assessment titled Light Horse Business Centre Volume 1: Environmental Assessment Report (ERM, 2008);
- Conditions contained within EPL 20121;
  - Excluding L4 Noise Limits, as there have been no noise complaints since operations began in 2012.
  - Excluding Condition O6.14, O6.15 and O6.16, as no composting has been undertaken during the audit period.
- Conditions contained within EPL 13426;
  - Excluding L4 Noise Limits, as there have been no noise complaints since operations began in 2012.
  - Excluding Conditions O5.11, O5.12 E7.1 & E7.2, the reasoning for this being the landfill planning and leachate management are mature systems the details of which have previously been submitted to the DP&E (and/or the EPA), and which have not been altered since previous audits.

- Excluding Conditions O5.19 through O5.21, the reasoning being that the landfill is not near the end of its lifespan and these conditions are as such not triggered at this time;
- Any items of particular interest to relevant agencies and organisations arising from consultation with:
  - NSW DP&E;
  - NSW Environment Protection Agency;
  - NSW DPI Water;
  - Office of Environment and Heritage; and
  - Blacktown City Council.
- Conditions within Environmental Management Plans, consisting of:
  - Soil, Water and Leachate Management Plan;
  - Stormwater Management Plan;
  - Spoil Management Plan;
  - Air Quality, Odour and Greenhouse Gas Management Plan;
  - Landscape and Vegetation Management Plan;
  - Aboriginal Heritage Management Plan.
- Conditions within assessments and other plans:
  - Bushfire Hazard Assessment (Holmes Fire And Safety, 31 July 2008);
  - Heritage Conservation Strategy For Aboriginal Sites;
  - Light Horse Business Centre Noise Impact Assessment (ERM, 2008); and
  - The Traffic Impact Assessment.

An odour assessment has recently been undertaken at the site by KMH Environmental in February 2017, and we would incorporate the findings of this assessment into the IEA.

Timing

ERM have scheduled the audit for the 22<sup>nd</sup> and 23<sup>rd</sup> of March 2017, and we appreciate your prompt response to this correspondence via post or email.

Email:

*Jolyon.peart@erm.com*

Post:

*Jolyon Peart*

*ERM*

*Locked Bag 3012*

*Australia Square NSW 1215 AUSTRALIA*

Yours,

A handwritten signature in black ink, appearing to read 'Peart', is written over a thin yellow horizontal line.

Jolyon Peart  
for Environmental Resources Management Australia Pty Ltd



Contact: Janne Grose  
Phone: 02 8838 7505  
Email: [janne.grose@dpi.nsw.gov.au](mailto:janne.grose@dpi.nsw.gov.au)

Our ref: V15/416#53 OUT17/11948  
File No:  
Your Ref:

Ms Jolyon Peart  
ERM  
Locked Bag 3012  
**AUSTRALIA SQUARE NSW 1215**

21 March 2017

Email: [Jolyon.peart@erm.com](mailto:Jolyon.peart@erm.com)

Dear Ms Peart

**Independent Environmental Audit – Genesis Landfill and Recycling Facility –  
Honeysuckle Drive, Eastern Creek (MP06-0139)**

Thank you for your letter received on the 14 March 2017 in relation to an independent environmental audit on 22 and 23 March 2017 of the Genesis Landfill and Recycling Facility (MP06-0139).

The former Department of Water and Energy (DWE) previously provided a submission on the Environmental Assessment for MP06-0139 (dated 18 February 2009). A copy of DWE submission can be obtained from DP&E major projects register website link:  
[http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=89](http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=89).

The former Office of Water (NOW), now DPI Water, also provided submissions on the Modification 3 proposal and the management plans (dated 7 July 2011) and revised Modification 3 application (dated 22 November 2011). It is suggested a copy of the 22 November 2011 submission is obtained from DP&E. The NOW advised the following in its submission on the revised Modification 3 proposal:

- the management plans do not adequately address the rehabilitation of riparian land in accordance with Condition 60 of the project approval for MP06-0139 or Blacktown City Council's adopted *SEPP 59 – Central Western Sydney Economic and Employment Area - Employment Lands Precinct Plan - Eastern Creek Precinct Plan (Stage 3)*.
- Condition 60 of the project approval requires the proponent to prepare and implement a Landscape and Vegetation Management Plan. The condition outlines that this plan must include detailed plans and procedures "*to restore and maintain the waterways and riparian zones of the Ropes Creek tributary on the site*"
- the riparian widths should be in accordance with the adopted SEPP No. 59 Eastern Creek Precinct Plan (Stage 3).
- The Environmental Management Strategy (EMS) and Landscape and Vegetation Management Plan reflect the SEPP No. 59 Eastern Creek Precinct Plan (Stage 3) controls:



- 5.6.1 (e) Development adjoining riparian corridors and trunk drainage channels (including detention basins and wetlands) must include a **10 m buffer zone** consisting of a landscaped open space area that can tolerate occasional flooding; and
- 8.3.5 (b) When measured from the top of the bank on either side of the creek, development consent shall not be granted, except for development associated with the protection, enhancement and management of the riparian corridor, on land within the precinct that is within:
  - **40 m** of Ropes Creek Tributary or
  - **10 m** of Upper Angus Creek.
- The EMS/VMP should include (but not be limited to) details on the following:
  - location of bed and banks and the footprint of the riparian zone to be established either side of the creek (measured from top of bank);
  - vegetation species composition, planting layout and densities;
  - seed/plant sources should be identified;
  - planting program, rehabilitation methods and staging and other revegetation techniques such as hydro seeding, direct seeding or assisted natural regeneration;
  - maintenance requirements; and
  - processes for monitoring and review including a method for performance evaluation.

DPI Water recommends the audit confirms whether:

- a Landscape and Vegetation Management Plan has been prepared and implemented as required by Condition 60 of the consent;
- The VMP includes details on the revegetation of the riparian zone; and
- a **40 m** wide riparian corridor (measured from the top of the bank) on either side of the Ropes Creek Tributary plus a **10 m buffer zone** adjoining the riparian corridor has been established and revegetated at the site in accordance with SEPP No. 59 Eastern Creek Precinct Plan (*Stage 3*) controls 5.6.1 (e) and 8.3.5 (b). (Please refer to the relevant pages 1-8, 5-2,5-9, 5-11, 8-7 and 8-9 in the attached precinct plan.)

Your letter indicates the operator does not hold any licences issued by DPI Water. DPI Water requests that the audit considers compliance with the relevant water licensing requirements for the landfill and recycling facility, specifically:

- Assessment as to whether the project holds the required water entitlements and licences under the *Water Management Act 2000* or *Water Act 1912* (as applicable)
- Compliance with the conditions of any water licences/approvals held
- Identification of all water storages for the complex and identification of their licensing status being either exempt, subject to harvestable rights or regulated via a water access licence.
- Quantification of both active and passive take by the project from each relevant water source and a comparison against previous predictions.

The following questions may aid in assessing the water licensing requirements of the quarry operation:

- Does the proponent have enough licensed water entitlement to cater for active and passive take of water?

- Are adequate records kept to enable determination of the volume and source of surface and groundwater taken?
- Do any exemptions under the Water Management (General) Regulation 2011 or Harvestable Rights Order (gazetted 31 March 2006) apply to the capture of water?

The audit should check if clean water runoff from undisturbed areas is diverted away from the development to the downstream catchments. Note: the collection of dirty water in dams or sediment ponds for a water supply is exempt from requiring a licence under the Water Management (General Regulation) 2011. The collection of clean water in dams/sediment ponds to provide a water supply is not exempt and must be in accordance with an appropriate Water Access Licence and a nominated work.

I trust this information is of assistance. Please note for future reference, **advice of this nature normally has a 4 week turn-around from DPI Water**. For further information please contact Janne Grose, Water Regulation Officer on t: (02) 8838 7505; e:[janne.grose@dpi.nsw.gov.au](mailto:janne.grose@dpi.nsw.gov.au).

Yours sincerely



**Irene Zinger**  
A/Regional Manager - Metro  
Water Regulation Operations

The General Manager  
Blacktown City Council  
PO Box 63  
Blacktown NSW 2148  
Via post and email: [council@blacktown.nsw.gov.au](mailto:council@blacktown.nsw.gov.au)

*Our Reference: 0397513 L03 Genesis IEA BCC*

**Attention: The General Manager**

Dear Mr Sir / Madam,



**RE: GENESIS LANDFILL INDEPENDENT ENVIRONMENTAL AUDIT**

I write in relation to an impending Independent Environmental Audit (IEA) proposed for the Genesis Landfill and Recycling facility, Honeycomb Drive Eastern Creek. The audit is triggered by development consent 06\_0139, and is required on a two yearly basis. The previous audit was undertaken by Cardno in 2015 and reported in the document 'Independent Environmental Audit Genesis Landfill and Recycling Centre', dated August 2015.

I specifically invite Blacktown City Council to review the audit scope outlined below, and to nominate any issues, concerns or items of particular interest that they would like to see included within the scope.

**Audit Scope**

Consistent with Section 2.2 of the Independent Audit Guideline (NSW Government, October 2015), ERM propose to apply a risk based approach to determining the audit scope. We would focus our audit on compliance with ongoing regulatory requirements, and would exclude a number of conditions that have previously been assessed and deemed compliant and which have not changed since the previous audit.

Specifically, ERM would assess compliance with respect to:

- The project Conditions of Approval (Schedule 3 of consent 06\_0139);
  - Excluding Conditions 6 – 11, the reasoning for this being the landfill planning and leachate management are mature systems the details of

which have previously been submitted the DP&E, and which have not been substantially altered since previous audits.

- Excluding Condition 12 as no composting has been undertaken during the audit period.
- Excluding Condition 21 through 25, as the Soil, Water and Leachate Management Plan, Erosion and Sediment Control Plan and Stormwater Management Scheme were prepared and approved by the Secretary prior to the commencement of construction on the site. Compliance with the monitoring requirements of Condition 25(i) would be tested by the audit.
- Excluding the entirety of Traffic, Transport & Access section, these conditions being largely related to the planning and construction phases of the development, and have little bearing on the environmental performance of the facility.
- Schedule 4, as this is yet to be triggered.
- Obligations contained within the Statement of Commitments of the Environmental Assessment titled Light Horse Business Centre Volume 1: Environmental Assessment Report (ERM, 2008);
- Conditions contained within EPL 20121;
  - Excluding L4 Noise Limits, as there have been no noise complaints since operations began in 2012.
  - Excluding Condition O6.14, O6.15 and O6.16, as no composting has been undertaken during the audit period.
- Conditions contained within EPL 13426;
  - Excluding L4 Noise Limits, as there have been no noise complaints since operations began in 2012.
  - Excluding Conditions O5.11, O5.12 E7.1 & E7.2, the reasoning for this being the landfill planning and leachate management are mature systems the details of which have previously been submitted to the DP&E (and/or the EPA), and which have not been altered since previous audits.

- Excluding Conditions O5.19 through O5.21, the reasoning being that the landfill is not near the end of its lifespan and these conditions are as such not triggered at this time.
- Any items of particular interest to relevant agencies and organisations arising from consultation with:
  - NSW DP&E;
  - NSW Environment Protection Agency;
  - NSW DPI Water;
  - Office of Environment and Heritage; and
  - Blacktown City Council.
- Conditions within Environmental Management Plans, consisting of:
  - Soil, Water and Leachate Management Plan;
  - Stormwater Management Plan;
  - Spoil Management Plan;
  - Air Quality, Odour and Greenhouse Gas Management Plan;
  - Landscape and Vegetation Management Plan;
  - Aboriginal Heritage Management Plan.
- Conditions within assessments and other plans:
  - Bushfire Hazard Assessment (Holmes Fire And Safety, 31 July 2008);
  - Heritage Conservation Strategy For Aboriginal Sites;
  - Light Horse Business Centre Noise Impact Assessment (ERM, 2008); and
  - The Traffic Impact Assessment.

An odour assessment has recently been undertaken at the site by KMH Environmental in February 2017, and we would incorporate the findings of this assessment into the IEA.

Timing

ERM have scheduled the audit for the 22<sup>nd</sup> and 23<sup>rd</sup> of March 2017, and we appreciate your prompt response to this correspondence via post or email.

Email:

*Jolyon.peart@erm.com*

Post:

*Jolyon Peart*

*ERM*

*Locked Bag 3012*

*Australia Square NSW 1215 AUSTRALIA*

Yours,

A handwritten signature in blue ink, appearing to read 'Jolyon Peart', with a horizontal line underneath.

Jolyon Peart  
for Environmental Resources Management Australia Pty Ltd

## Jolyon Peart

---

**From:** Judith Portelli <Judith.Portelli@blacktown.nsw.gov.au>  
**Sent:** Friday, 10 March 2017 4:56 PM  
**To:** Jolyon Peart  
**Subject:** RE: Attention: The General Manager

Hello Jolyon,

Thankyou for your email . I have discussed this with our environmental health unit and I have checked the planning matters. We consider that your audit list which includes the development consent conditions imposed by DPE is covers the issues satisfactorily and that nothing further needs to be added

Thankyou

JUDITH PORTELLI

MANAGER DEVELOPMENT ASSESSMENT

98396228

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**From:** Jolyon Peart [<mailto:jolyon.peart@erm.com>]  
**Sent:** Wednesday, 8 March 2017 12:34 PM  
**To:** Blacktown Council  
**Subject:** Attention: The General Manager

Dear Mr Sir / Madam,

The attached document is a copy of a letter sent via post on the 7<sup>th</sup> of March in relation to an Independent Environmental Audit (IEA) proposed for the Genesis Landfill and Recycling facility at Honeycomb Drive, Eastern Creek. The purpose of this email is to provide advanced notice of the letter to Council.

Kind regards

Jolyon Peart  
Senior Environmental Scientist

### ERM

Level 15 | 309 Kent Street | Sydney, NSW 2000 |

T +61 02 8584 8815 | M 0478 179 657

E [Jolyon.Peart@erm.com](mailto:Jolyon.Peart@erm.com) | W [www.erm.com](http://www.erm.com)



**ERM** *The business of sustainability*

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\*\*\*\*\*



NSW Office of Environment and Heritage  
PO Box A290  
Sydney South, NSW 1232  
Via post and email: [planningmatters@environment.nsw.gov.au](mailto:planningmatters@environment.nsw.gov.au)

*Our Reference: 0397513 L03 Genesis IEA OEH*

**Attention: Senior Team Leader, Metropolitan Planning**

Dear Sir / Madam,



**RE: GENESIS LANDFILL INDEPENDENT ENVIRONMENTAL AUDIT**

I write in relation to an impending Independent Environmental Audit (IEA) proposed for the Genesis Landfill and Recycling facility, Honeycomb Drive Eastern Creek. The audit is triggered by development consent 06\_0139, and is required on a two yearly basis. The previous audit was undertaken by Cardno in 2015 and reported in the document 'Independent Environmental Audit Genesis Landfill and Recycling Centre', dated August 2015.

I specifically invite the OEH to review the audit scope outlined below, and to nominate any issues, concerns or items of particular interest that they would like to see included within the scope.

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- Conditions within Environmental Management Plans, consisting of:
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ERM have scheduled the audit for the 22<sup>nd</sup> and 23<sup>rd</sup> of March 2017, and we appreciate your prompt response to this correspondence via post or email.

Email:

*Jolyon.peart@erm.com*

Post:

*Jolyon Peart*

*ERM*

*Locked Bag 3012*

*Australia Square NSW 1215 AUSTRALIA*

Yours,

A handwritten signature in blue ink, appearing to read 'Jolyon Peart', is written over a yellow horizontal line.

Jolyon Peart  
for Environmental Resources Management Australia Pty Ltd

## Annex D

# Audit Criteria and Findings

Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
<b>Compliance Assessment Criteria:</b> C - Compliant NC - Non-Compliant ANC - Administrative non-compliance NV - Not Verified NT - Not Triggered OBS - Observation NOTED									
<b>I: Administrative Conditions</b>									
1	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.	Document review	Volumetric surveys of landfill for license No. 20121 dated 2015 – 2017 with photograph displaying numbered stockpiles.	a) In respect to 'Composting' the auditor understands no composting has been undertaken at the site during the audit period. b) the auditor understands no general waste is accepted by the facility, only GSW-non putrescible. c) the auditor is advised that no long term storage of waste occurs within the licenced facility. Temporary storage of recovered materials occurs until saleable quantities are reached.	C	C	-	-
2	A2.1	The licence applies to the following premises: Genesis Recycling Facility	-	-	-	NOTED	NOTED	-	-
3	A3.1	This licence applies to all other activities carried on at the premises, including: - resource recovery (recovery of waste tyres)	-	-	-	NOTED	NOTED	-	-
4	A4.1	Information supplied to the EPA: Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.	-	-	-	NOTED	NOTED	-	-
5	A4.2	Scheduled Development Works: The approval to carry out the scheduled activity of composting is subject to consent being obtained from the Department of Planning and Infrastructure and the installation of all infrastructure as required by Project Approval 06-0139 (as modified).	-	-	-	NOTED	NOTED	-	-
<b>2: Discharge to Air and Water Applications to Land</b>									
6	P1.1	Location of monitoring/ discharge points and areas 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.	-	-	-	NOTED	NOTED	-	-
7	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.	-	-	-	NOTED	NOTED	-	-
8	P1.3	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.	-	-	-	NOTED	NOTED	-	-

Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
<b>3: Limit Conditions</b>									
9	L1.1	Pollution of waters 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.  <i>Part 5.3 Water Pollution</i> <i>120 Prohibition of pollution of waters</i> <i>(1) A person who pollutes any water is guilty of an offence</i> <i>(2) In this section: pollute waters includes cause or permit any waters to be polluted.</i>	Document Review	Surface Water Quality Monitoring Records EPL 20121 and 13246	The Auditor reviewed surface water monitoring data for the site and reviewed the EPL annual returns with respect to potential surface and groundwater exceedances. Exceedances of licence limits in relation to discharges to surface water bodies (sediment basin overflows) were not observed within the data reviewed. While elevated TSS were identified within sediment basins in Q3 2015 the auditor has not identified any data to indicate an overflow of the basin occurred during the audit period (noting an overflow occurred in Q2 2015 - which is outside the audit assessment timeframe).	C	C	-	-
10	L1.2	The licensee must operate the premises in a manner that ensures that all stormwater from all areas of the premises which has the potential to mobilise sediments and other material is controlled and diverted through appropriate erosion and sediment control/pollution control measures and sedimentation ponds.	Document Review, visual inspection of sediment basins and depth indicators	Site Surface Water Management Plan (Storm Consulting, November 2008) Soil, Water and Leachate Management Plan (March 2017) Specification for Leachate Management System Rev 3 (Douglas Partners, April 2012)	It is understood clean water accumulating in the pit is captured within an internal sump which is used as a source of water on the site for dust suppression etc. Surface water captured on the western side of the amenity berms is understood to be diverted into one of two sediment basins prior to discharge into the environment.	C	C	-	-
11	L2.1	For each monitoring/discharge point or utilisation area specified in the table\ below- Points 5,6,7,8, the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Document review.	Surface Water Quality Monitoring for EPL 13426 and 20121 - data obtained from the DADI website.	Review of EPL monitoring data indicates the following exceedances of licence limits were observed: - Q3 2016/17 for TSS (south west dam); - Q4 2015 for pH (both dams); - Q3 2015 for pH (NW dam) and TSS (both dams). It is noted the TSS results for Q3 2015 were over eight times the limit. It is unclear from the evidence provided, whether water was in fact discharged from the sediment basins, and therefore gave rise to pollution. The risk rating reflects the auditees assertion that water was not discharged from the basins.	C	NC	LOW	-
12	L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Document review.	Surface Water Quality Monitoring for EPL 13426 and 20121 - data obtained from the DADI website.	Review of EPL monitoring data indicates the following exceedances of licence limits were observed: - Q4 2015 for pH (both dams); - Q3 2015 for pH (NW dam) and TSS (both dams).	C	NC	LOW	-
13	L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\s.			N/A	NOTED	NOTED	N/A	N/A
14	L2.4	Water and/or Land Concentration Limits		Site Surface Water Management Plan (Storm Consulting, November 2008) p 22-25	N/A	NOTED	NOTED	-	-



Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
15	L3.1	<i>Waste</i> 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 [EPL Page 9 of 26 - Wood waste, Garden waste, Building and demolition waste, Waste tyres, Soils meeting GSW].	Visual inspection Document review	DADI rejected loads register  Testing results for incoming soils (AAM)  Timber Certification Reports January 2016 - Resource Recovery Order  Timber Sales Report February and January 2016 - Resource Recovery Exemption	The Auditor understands the site operator implements a number of practices to control the types of waste received, including a system of visual checks and a requirement for a waste classification letter to accompany any waste soils. The Auditor reviewed the rejected loads register, and a sample of waste classification letters and is satisfied that the site operator has systems in place to ensure inappropriate waste materials are identified and prevented from entering the site.  It is noted that the EPA issued a Show Cause Letter (ref 1546749) in relation to the acceptance of Recycled Asphalt Profiles at the site and a Clean up notice (1549945) in relation to the alleged presence of asbestos in the unprocessed and processed products stockpiles during the audit period.  The auditor notes that asphalt is preclassified as general solid waste in the NSW Waste Classification definitions, and hence does not believe the acceptance of asphalt at the premises constitutes a non compliance with licence conditions.  With respect to Clean up notice 154994, the auditor has been requested by the auditee to refrain from offering a finding.	C	No Finding	Not Assessed	Following the conclusion of legal proceedings in respect to this matter, or no later than the conclusion of the following IEA, update the compliance status of this audit criterion in line with the findings of the court, and re-publish the redacted report on the DADI website. This may be achieved via an addendum to the report.
16	L3.2	No disposal or landfilling of waste may occur at the premises.	Visual inspection Document review	Dial A Dump Industries EMS Waste Monitoring Program [Facility Procedures] Issue 2 (5 November 2015)  EHS Work Instruction: Asbestos Removal and Hazardous Substances (Revised 31 March 2015)  EHS Work Instruction: Procedure for Handling Asbestos Waste (Revised 31 March 2015)	The Auditor has visually inspected the waste processing facilities and has not identified any evidence of landfilling at this location.	C	C	-	-
17	L3.3	The applicant must have in place and implement procedures to identify and prevent the acceptance of any waste not permitted by condition L3.1 to be accepted at the premises.	Document review	Genesis Spotters Training Manual  Rejected loads register	Procedures have been implemented to identify and exclude prohibited materials however evidence suggests these procedures have not been entirely effective.  The auditee indicates a new asbestos screening tool has been procured and is being implemented to improve detection rates for prohibited materials. The auditor suggests this is likely to improve the efficacy of the programme in the future.	C	C	-	-
18	L3.4	No asbestos waste is to be accepted or stored at the premises.	Visual inspection Document review	Genesis Spotters Training Manual	Review of site procedures and interviews with staff indicates the licensee endeavours to identify and exclude asbestos containing waste on entry, and during tipping. Furthermore the auditee indicates they have procured an asbestos testing instrument and they will utilising it to minimise the likelihood of asbestos being inadvertently accepted at the facility. Nevertheless the auditor notes that EPA show cause letter (ref 1545864) indicates that asbestos has been brought onto the facility on at least one occasion during the audit period.  The auditor is of the opinion that sufficient evidence exists to support a conclusion that asbestos (type 2 special waste) has been received at the facility, and therefore finds the operation to be non compliant with this condition.	C	No Finding	Not Assessed	Following the conclusion of legal proceedings in respect to this matter, or no later than the conclusion of the following IEA, update the compliance status of this audit criterion in line with the findings of the court, and re-publish the redacted report on the DADI website. This may be achieved via an addendum to the report.
19	L3.5	Garden waste stockpiled on the premises shall not exceed 20,000 tonnes at any one time.	Visual inspection, staff interviews.	Visual inspection  Staff interviews  Various volumetric surveys of landfill for license No. 20121 dated 2015 – 2017 with photograph displaying numbered stockpiles.	No garden waste is believed to be accepted by the facility.	C	C	-	It is recommended the Genesis Spotters Training Manual is updated to make it clear garden waste and in particular palm trees are not accepted.

Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
20	L3.6	Each individual wood waste stockpile both processed and unprocessed will be limited in size to < 2000 tonnes.	Document review (volumetric surveys)	Volumetric surveys of the site / 'Licence Survey Checklists' for the audit period.	Review of volumetric surveys from June 2016, December 2016 and December 2015 indicates wood stockpiles were below the licence limit.	C	C	-	-
21	L3.7	The authorised amount of waste permitted on the premises cannot exceed 667000 tonnes at any one time.	Document review (volumetric surveys)	Volumetric surveys of the site / 'Licence Survey Checklists' and 'Landfill Facility Information Certificates' for the audit period.	Review of the December 2016 volumetric survey indicates 128263 t of waste was recorded on site. This is below the licence limit.	C	C	-	-
22	L 4.1	Noise Limits Noise generated from the Landfill and Resource Recovery Facility must not exceed the noise limits presented in the table below. (Refer to table page 10 of EPL 20121).	Document review	Genesis Eastern Creek Compliance Noise Assessment (Pacific Environment, 2015, 2016)	A noise monitoring programme is implemented on site (on a six monthly basis). Results of the programme indicate noise from the facility was not audible within the ambient noise environment at monitoring locations.  The same reports describe the preparation of a noise model to better characterise noise impacts of the facility. The report concludes that the results of the calibrated model indicate the facility complies with specified EPL noise limits at the nearest residential receivers.	C	C	-	-
23	L 4.2	The noise limits set out in condition L4.1 apply under all meteorological conditions except for the following: The noise emission limits identified apply under meteorological conditions of: a) Wind speed up to 3m/s at 10 metres above ground level: or b) Temperature inversion conditions of up to 3°C/100m and wind speed of up to 2m/s at 10 metres	-	-	N/A	NOTED	NOTED	-	-
24	L 4.3	For the purposes of condition L4.2: a) Data recorded by the nearest Bureau of Meteorology station must be used to determine meteorological conditions; and b) Temperature inversion conditions (stability category) are to be determined by the sigmatheta method referred to in Part E4 of Appendix E to the NSW Industrial Noise Policy	-	-	N/A	NOTED	NOTED	-	-
25	L 4.4	To determine compliance: a) with the LAeq (15 minute) noise limits in condition L4.1, the noise measurement equipment must be located as follows: Noise from the operation is to be measured at the most affected point or within the residential boundary, or at the most affected point within 30 metres of a dwelling (rural situations) where the dwelling is more than 30 metres from the boundary, to determine compliance with the LAeq (15 minute) noise limits. Where it can be demonstrated that direct measurement of noise from the operation is impractical, the EPA may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy).	Document review	Genesis Eastern Creek Compliance Noise Assessments (Pacific Environment, 2015, 2016)	Review of the referenced noise reports suggests all monitoring was undertaken in accordance with licence limits.	C	C	-	-
26	L 4.5	A non-compliance of condition L4.1 will still occur where noise generated from the premises in excess of the appropriate limit is measured: • at a location other than an area prescribed by conditions L4.1(A) and L4.1(B); and/or • at a point other than the most affected point at a location		N/A	N/A	NOTED	NOTED	-	-
27	L 4.6	For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment. Note: NSW Industrial Noise Policy refers to the document entitled " New South Wales Industrial Noise Policy" published by the NSW Environment Protection Authority in January 2000."		Dial A Dump Industries EMS Noise Monitoring Program	N/A	NOTED	NOTED	-	-

Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
28	L 4.7	Noise monitoring must be conducted as per licence conditions with additional monitoring times to reflect the extended operating hours.		Genesis Eastern Creek Compliance Noise Assessment (Pacific Environment, 2015, 2016)	The auditor understands noise monitoring has been undertaken in compliance with licence conditions.	C	C	-	-
29	L5.1	Operating hours for all activities at the Premises must be limited to between 7:00am and 6:00pm Monday to Friday, and 8:00am to 4:00pm Saturday, Sunday and Public Holidays.	Document review	Employee clock on and off records	The auditor sighted the hours of operation stated on the front site entry and reviewed a sample of four employee clock on and off data sheets for four days within the audit period. No instances of staff clocking on before 6.00 am or after 6 pm were observed.	C	C	-	-
30	L5.2	Operating hours for the operation of the Main Processing Centre will be from 6:00am to 10:00pm Monday to Friday and 6:00am to 4:00pm Saturday, Sunday and public holidays.	Document review Interviews with staff.	Employee clock on and off records	The auditor sighted the hours of operation stated on the front site entry and reviewed a sample of four employee clock on and off data sheets for four days within the audit period. No instances of staff clocking on before 6.00 am or after 6 pm were observed.	C	C	-	-
31	L5.3	Operating hours of the conveyor and chute system are restricted to the premises operational hours as specified in Condition L5.1. i.e.: 7:00am and 6:00pm Monday to Friday, and 8:00am to 4:00pm Saturday, Sunday and Public Holidays.	Document review Interviews with staff.	Dial a Dump Industries EMS Conveyor and Chute Waste Handling Procedures (March 2017)  MPC Chute & Transfer Report - scales time logs		C	C	-	-
32	L6.1	No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.	-	-	-	NOTED	NOTED	-	-
33	L7.1	a. stockpiles of processed garden waste within the Green Waste/Timber Waste Area will not exceed the height of the existing surrounding concrete walls (2.5 metres).  b. stockpiles of unprocessed garden waste and processed and unprocessed wood waste will not exceed 2.5 metres above the height of the existing surrounding concrete walls (2.5 metres).	Visual inspection	-	The auditor did not observe any wood waste stockpile to be in excess of 2.5m above the height of the perimeter walls during the audit.	C	C	-	-
34	L7.2	No stockpile at the premises is to exceed the height of the Amenity Berms at 10 meters.	Visual inspection		The auditor did not observe any stockpile to be in excess of the height of the amenity berms during the audit.	C	C	-	-
4: Operating Conditions									
35	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.	Document review Visual inspection	Staff training records (Asbestos awareness workshop - 27 Apr 2017) and general skills and training matrix  A sample of the operators tickets to operate mobile plant.  EHS Procedures and Instructions including SWMS for operation of a range of mobile plant.	The issue of competence is raised in Show Cause Letters issued by the NSW EPA in relation to the presence of ACM in the aggregates processing area.  Competence, in the auditors opinion, is the demonstrated ability to implement skills and knowledge. The auditor has reviewed a range of evidence and is satisfied that employees on the site possess sufficient knowledge and skills to perform their roles. All operations reviewed during the site audit were being implemented in a competent manner, and the auditor is of the view that activities at the site are generally carried out in a competent manner.	C	C	-	-

Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
36	O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Document review Interviews with staff. Visual inspection	Plant and equipment maintenance records  Staff training records  MPC Maintenance Shift Reports	The auditor has reviewed a range of information and is of the opinion that plant and equipment at the site is maintained and operated in proper and efficient manner.	C	C	-	-
37	O3.1	Maintain the premises in a condition which minimises dust emissions	Document review Visual inspection	Dust suppression - water cart operating schedule/operator work records  Air Quality Monitoring Reports: - 2016 Q3 - 2016 Q2 - 2016 Q1 - 2015 Q4 - 2015 Q3	The site employs dust controls including sprinklers on outdoor stockpiles, fine mist sprays in the MPC building and a water cart for internal roads. The auditor did not observe excessive dust generation during the site visit.  Review of air quality monitoring reports indicate the site was generally compliant with dust related licence conditions during the audit period, suggesting the site is maintained in a condition which minimises dust.  It is noted that this condition is relevant to an Official Caution 1536953 lodged by the EPA. This matter is discussed further in Audit Criteria 460.	C	C	-	-
38	O3.2	The licensee must ensure that all activities conducted at the premises are carried out in a manner which minimises or prevents the generation of dust.	Document review Visual inspection	Dust suppression - water cart operating schedule/operator work records  Air Quality Monitoring Reports prepared by Pacific Environment and Thompson Environmental Systems for the periods: - 2016 Q3 - 2016 Q2 - 2016 Q1 - 2015 Q4 - 2015 Q3	The site employs dust controls including sprinklers on outdoor stockpiles, fine mist sprays in the MPC building and a water cart for internal roads. The auditor did not observe excessive dust generation during the site visit.  Review of air quality monitoring reports indicate the site was generally compliant with dust related licence conditions during the audit period, suggesting the site is maintained in a condition which minimises dust.	C	C	-	-
39	O3.3	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	Visual inspection	-	The auditor reviewed a sample of truck movements during the site audit (approximately 5 minutes watching trucks entering and leaving the site). No noncompliant trucks were observed.	C	C	-	-
40	O3.4	Ensure that stockpiles are kept wet during the transfer of waste to and from the stockpile and during processing	Visual inspection	Visual inspection	A series of misters are situated within the processing shed that are operated during waste receipt and processing. Sprayers are present within the coarse material stockpiling area. Sprayers were observed to be in operation on some finished product stockpiles at the time of the site audit in the aggregates area however sprayers were not observed on all stockpiles. The auditor understands sprayers are set on timers and do not operate continuously. The stockpiles in question were not observed to be giving off dust.	C	C	-	-
41	O4.1	The Licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The Licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, 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.	Document review	Site Emergency Management Manual (First Five Minutes, 6th June 2016)  Fire and Emergency Directions Plan DADI 2012	The auditor has reviewed a document titled 'Genesis MPC Plant – Fire and Emergency Directions' that was provided by the auditee following the audit. The auditor believes this document broadly addresses the requirements of this recommendation. It is noted however that the plan is limited in its scope (being focussed primarily on health and safety matters). Hence there is merit in revising this plan to better mitigate the risks of emergency events on the environment.	C	C	-	Update the Emergency Management Manual (First Five Minutes, 6th June 2016) to ensure it addresses a range of potential environmental emergencies.
42	O5.1	Ensure waste that has been recovered has been stockpiled separately.	Document review Visual inspection	Various volumetric surveys of landfill for license No. 20121 dated 2015 – 2017 with photograph displaying numbered stockpiles.	The auditor sighted various recovered aggregates and fines stockpiles during the audit site inspection. These were stockpiled discretely according to product. A volumetric survey was sighted which indicates the size of each discrete stockpile on the site.	C	C	-	-

# Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
43	O5.2a	The licensee must: a) Implement suitable measures to manage pests, vermin and declared noxious weeds on site;	Document review Visual inspection	Pests, Vermin Feral Animals and Declared Noxious Weeds Management Plan, Revised 16 March 2017  Dial a Dump Industries Eastern Creek Bushland Restoration Works Program 2017 Financial Year (Earth Repair and Restoration)  Weed Management Reporting (record of weed control activities) dated: - February 2017 - June 2016 - September 2016 - November 2016  Tax Invoices for vermin control (four invoices - Rentokil)	Active and regular weed control activities appear to have been undertaken at the site during the audit timeframe.  Some pest control is undertaken at the site, though this is limited to rodents and insects. The auditor observed fox prints in surface soils at two locations during the site inspection. The auditor notes that fox activity was observed during the Cardno audit of 2016, and that this was the trigger for recommendations in relation to feral animal control. Feral animal management therefore appears to be an ongoing issue at the site.	C	NC	LOW	Control populations of pests, vermin and declared noxious weeds on site. Control measures should extend to foxes and feral cats.
44	O5.2b	b) Inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area.	Document review	Pests, Vermin Feral Animals and Declared Noxious Weeds Management Plan, Revised 16 March 2017  Dial a Dump Industries Eastern Creek Bushland Restoration Works Program 2017 Financial Year (Earth Repair and Restoration)  Weed Management Reporting (record of weed control activities) dated: - February 2017 - June 2016 - September 2016 - November 2016  Tax Invoices for vermin control (four invoices - Rentokil)	An ongoing inspection programme is understood to have been started in April 2016 titled Landfill WVI Daily, Fortnightly and Monthly. One of the inspection parameters states: "2.1 There are no signs of noxious weeds or pests / vermin around the Landfill area in sufficient numbers to pose an environmental hazard or cause loss of amenity"  Notwithstanding the inspection checklist noted above, the auditor has not identified any evidence that weed and feral animal populations are effectively monitored on the site and that the location and scale of management activities are informed by the results of the monitoring undertaken.	C	OBS	-	Undertake monitoring for the presence, distribution and numbers / density of pests, vermin or noxious weeds and use this information to inform the control programmes implemented at the site.
45	O5.2	c) Perform ongoing monitoring of weed infestation on and adjoining the site.	Document review	<i>Refer to above</i>	Notwithstanding the inspection checklist noted in the preceding condition, the auditor has not sighted evidence that weed populations on the site are formally monitored. The auditor understands the weed management contractor undertakes weed control reactively in response to observations of weed prevalence across the site.	C	OBS	-	As above.
46	O5.3	Procedures in place to minimise the risk of fire at the premises	Visual inspection Document review	EHS System Procedure - 'Minimising the Risk of Fire' dated February 2016  Landfill Supervisor Compliance WVT's - Daily, Fortnightly and Monthly Checks	The auditor has reviewed the referenced document and undertaken opportunistic inspection for the presence of fuel across the site.  Noting that ERM does not provide fire safety advice, in the auditors opinion generally adequate procedures are in place to minimise the risk of fire at the premises. It is recommended however that checks for the maintenance of the asset protection zones are included within the monthly landfill supervisor checks to ensure compliance with the Bushfire Hazard Assessment (Holmes Fire and Safety, 2008).	C	C	-	It is recommended checks of the asset protection zones are included within the monthly landfill supervisor checks to ensure compliance with the Bushfire Hazard Assessment (Holmes Fire and Safety, 2008). It is further recommended, consistent with the recommendations of the 2015 IEA, that a Bushfire Management Plan be prepared to inform bushfire management on the site, including control of fuel loads, ignition management and the suppression / frequency regulation of fires.
47	O5.4	The licensee must take all practicable steps to control entry to the premises.	Visual inspection Document review	Visual Inspection  Security invoices.	A lockable gate is located at the boundary of the site. The auditor has sighted four invoices issued by Nycon Security which indicate an ongoing security management system at the site.	C	C	-	-
48	O5.5	The Licensee must not allow the tracking of waste and mud by vehicles leaving the premises.	Visual inspection	Visual inspection	Visible mud was not observed on surface roads in the course of the audit. The auditor observed trucks utilising the wheel wash.	C	C	-	-
49	O5.6	The Licensee must ensure that all waste stored or processed at the premises is assessed and classified in accordance with the EPA Waste Classification Guidelines as in force from time to time.	Document review	Sample of waste classification reports	The auditor reviewed a five waste classification reports for soil materials brought onto the site on a randomly selected date - 30th May 2017. These classification reports are understood to represent the only loads of soil received on that date. Information provided by the licensee also indicates four loads described as 'asbestos soil' and a number of loads of GSW (believed to be C&D waste) were received on that date also.  The auditor notes that soils received were appropriately classified, asbestos / soil mixtures were recorded as such and other waste was appropriately classified by visual means on arrival.	C	C	-	-

# Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
50	O5.7	All stormwater and stormwater treatment devices (including drainage systems, sumps and traps) must be regularly maintained.	Visual inspection Document review	Fortnightly OSD Pit Inspection records dated: - 5/12/2016 - 1/3/2017 - 27/3/2017 - 8/5/2017  Invoice from Davcol Pty Ltd for the "Service and cleaning of two storm water gross pollutant traps" including minor servicing every 3 months and one major service per year for the period 2015 - 2016.	Review of inspection records and a servicing invoice indicates stormwater and stormwater treatment devices have been maintained adequately.	C	C	-	-
51	O5.8	Sediment ponds must be maintained in a manner that ensures these retain an appropriate freeboard to minimise the potential for any turbid discharge. Depth indicators must be installed and maintained within these ponds that indicate the required freeboard to be maintained.	Visual inspection Document review	Invoice from Davcol Pty Ltd for the "Service and cleaning of two storm water gross pollutant traps" including minor servicing every 3 months and one major service per year for the period 2015 - 2016.	The auditor observed that the water levels in the sediment basins were below the depth indicators on the date of the audit. Maintenance records suggest sediment basins are maintained periodically (at least every 3 months).  The licensee indicates they monitor water levels to minimise the potential for discharge of turbid water and the auditor has sighted periodic (believed to be quarterly) monitoring data for water within the basins. Quarterly monitoring is not considered sufficiently frequent to mitigate the risk of discharges of turbid water from the basins. Furthermore the actions to be taken in response to high water levels or the presence of turbid water are not presently documented leaving the management response unclear.	C	OBS	-	It is recommended that the "Fortnightly OSD Pit Inspection" visual inspection programme (or other suitable inspection programme) be extended to cover the sediment basins. The level of water in the basins should be recorded, as well as the turbidity. On the basis of these parameters the basins should be flocculated and dewatered as required to reduce the likelihood of overflow. The frequency of monitoring and dewatering may be increased in response to forecast high rainfall events.
52	O6.1	The licensee must ensure that stockpiles of waste tyres are located in a clearly defined area.	Visual inspection Document review	Photos of tyre storage area	The auditor did not identify the presence of a dedicated tyre storage area during the audit, however the auditee indicates a temporary tyre storage area is present within the MPC. The auditor has since sighted photos of this area.	C	NV	-	-
53	O6.2	The licensee must ensure that stockpiles of waste tyres are managed so as not to cause or to be likely to cause the spread of disease by vermin.	Document review	Landfill Daily, Fortnightly and Monthly WVI inspection records	Review of the Landfill Daily, Fortnightly and Monthly WVI inspection records for the site indicates the licensee monitors the condition of incoming tyres. In particular the auditor understands that for loads of tyres it is a requirement that they arrive shredded or with the walls removed.	C	C	-	-
54	O6.3	The licensee must ensure that measures are taken to prevent stockpiles of waste tyres from catching on fire.	Document review	Environmental Management Strategy (EMS) Waste Monitoring Program  Tyre Waste Management Procedure (DADI, 2016)	The Tyre Waste Management Procedure contains measures to prevent stockpiles of tyres from catching on fire.	C	C	-	-
55	O6.4	Without limiting the above conditions, any area(s) used for the storage of waste tyres at the premises must:  a) be surrounded by a fire break of at least six (6) metres, which is kept clear of combustible material; and b) be fenced or otherwise secured to prevent any unauthorised access to the waste tyres and the fire break.	Visual inspection Document review	Photos of tyre storage area	The auditor did not identify the presence of a dedicated tyre storage area during the audit, however the auditee indicates a temporary tyre storage area is present within the MPC. The auditor has since sighted photos of this area.	C	NV	-	-



# Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
56	O6.5	Water which contacts waste in the garden waste area or the Materials Processing Centre, other than virgin excavated natural material, must be managed as leachate. Leachate must only be disposed of by: a) disposal to sewer via a trade waste agreement, b) disposal at a facility licensed to accept such waste.	Visual inspection of green waste area, interview	Dial a Dump Industries EMS Leachate Collection Conveyance and Management System (June 2011 and Revised 16 March 2017)  Trade Waste Agreement 2016 - 2018  Commercial and Industrial Customer Services Trade Waste Agreement/Consent Number: 35580 Routine Inspection 2016-09-27, 2017-05-19	The auditor inspected the wood waste storage area and notes leachate is captured in a sump and thereafter pumped into a storage tank prior to disposal via trade waste.	C	C	-	-
57	O6.6	Leachate must not be irrigated and/or used for dust control at the premises.	Visual inspection	Visual inspection of water cart filling standpipe	The auditor sighted photographs of the water cart filling standpipe and understands the water used to supply the standpipe is recovered from the 'clean water' dam within the landfill.	C	C	-	-
58	O6.7	The Licensee must not cause or permit any leachate to pool at the premises.	Visual inspection of drainage infrastructure.	Visual inspection  Appendix C: Martens Consulting Engineers (2011) Consolidated Stormwater Management Plan	Leachate was not observed pooling during the site inspection. Within the landfill void, leachate levels are maintained below the level of the waste surface.	C	C	-	-
59	O6.8	The Licensee must ensure that at no time is asbestos waste (as defined in the POEO Act) is permitted to be placed in the conveyor/chute system for conveyance to the base of the landfill.	Document review	SPOTTERS TRAINING MANUAL December 2016  Asbestos Management Plan (DADI, March 2017)  Work Direction Document Asbestos Guidelines  GENESIS LANDFILL DAILY PROCEDURES	The auditor has not sighted evidence of asbestos being placed in the chute, however in the absence of ongoing and regular inspection of site conditions such a condition is difficult to demonstrate conclusively. The auditor has reviewed a range of documentation in relation to the management of asbestos on the site and is satisfied that effort is being made to ensure no asbestos is received in the plant or placed into the chute.	C	C	-	-
60	O6.9	The licensee must have in place and operate a calibrated weighbridge to record the volume of all waste brought into the premises.	Document review	Weighbridge calibration records dated 20 September 2016	The auditor has reviewed weighbridge calibration certificates and confirms that these calibration certificates demonstrate the site has a calibrate weighbridge. A sample of jobs have been reviewed and tonnages are recorded.	C	C	-	-
61	O6.10	The licensee must continuously operate video surveillance cameras at all weighbridges associated with the conveyor belt transfer system.	Visual inspection	Visual inspection of surveillance cameras	The auditor sighted the continuously recording video surveillance system at the site weighbridge.	C	C	-	-
62	O6.11	All vehicles entering and exiting the premises must be recorded as they pass across the weighbridges or pass through a dedicated vehicle access point that has video monitoring and electronic recorded 'boom gates'.	Visual inspection of surveillance cameras	-	The auditor viewed the site's CCTV footage and observed footage of trucks vehicles entering and exiting the premises.	C	C	-	-

# Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
63	O6.12	There must be no incineration or burning of any waste at the premises	Visual inspection, staff interview	Interviews with staff WVI checklist (routine visual inspection checklist)	The auditor did not observe evidence of any burning of waste on the site.	C	C	-	-
64	O6.13	The licensee must submit to the EPA's Waste Operations every 6 months, a volumetric survey of the Premises carried out by a registered surveyor: a) During June each year and provided to the EPA in the approved form and manner by no later than 31 July in that year; and b) During December each year and provided to the EPA in the approved form and manner by no later than 31 January in that year.	Document review: volumetric surveys for the last two years	Various volumetric surveys of landfill for license No. 20121 dated Dec 2015, June 2016 and December 2016 with photograph displaying numbered stockpiles.	Volumetric surveys have been sighted.	C	C	-	-
65	O6.14	Composting The licensee shall manage windrow composting operations in accordance with AS 4454-2003: Composts, Soil Conditioners and Mulches, Appendix N, Best practice guidelines for Composting Systems, the EPA Environmental Guidelines for Composting & Related Organics Processing Facilities, or other practices approved by the EPA.			No composting is undertaken on site.	NT	NT	-	-
66	O6.15	Each garden waste windrow must have an individual cover and aerobic equipment fitted to reduce odour and the generation of leachate.			No garden waste is brought into the facility.	NT	NT	-	-
67	O6.16	The licensee will construct and maintain designated bays of approximately 5m x 15m separated by concrete walls in the Garden Waste/ Timber Waste area generally in accordance with the document "LHBC Environment Assessment Report " dated August 2010 before composting.			No composting is undertaken on site.	NT	NT	-	-
68	O7.1	Bunding must be maintained for the leachate storage tanks that: - is impervious to the fluids contained; and - has sufficient capacity to contain 110% of the of the largest vessel; and - will contain all pressurised leaks or spills.	Document review	Certification and Survey of Spill Containment Areas for Genesis Waste Facility Eastern Creek (Environ Consulting Services, 9 August 2016)	Review of the referenced document indicates bunding for the leachate storage tanks is adequate.	C	C	-	-
69	O7.2	The licensee shall store all chemicals, fuels and oils used on site in an appropriately designed impervious bunded area that contains 110 percent of the largest container contained within the bund. These bunds shall be designed and installed in accordance with the requirements of all relevant Australian standards, and/or EPA's Environment Protection Manual Technical Bulletin Bunding and Spill Management.	Document review	As above.	Three drums labelled as containing hydrocarbons (but empty at the time of the audit) and two lead acid batteries were observed to be stored on a self bunded pallet near the entrance to the MPC. Whilst the capacity of the sump exceeded the volume of the largest container + 10% the integrity of the bund had been compromised as it had been punctured by a forklift.  The auditor was advised that no bulk chemicals or hydrocarbons are stored on the site.	C	NC	LOW	Store all chemicals, fuels and oils used on site in an appropriately designed impervious bunded area that contains 110 percent of the largest container.  It is recommended the auditee consider AS1940 during the design of any bunded areas, and in particular the following note: "NOTE: Portable bunding units, e.g. bunded pallets, or flexible bunding units are not suitable for permanent storage as there are no uniform performance criteria for chemical resistance or fire resistance and they can be easily moved to an unsuitable location. They may be suitable for the short-term holding of damaged packages, or where goods are in transit or in manufacturing and handling areas."
70	O7.3	The licensee must: a) Implement suitable measures to prevent unnecessary proliferation of litter both on and off site; and b) Inspect and clear the site and surrounding area of litter on a daily basis.	Document review. Visual inspection.	WVI inspection (internal routine inspection records)	The auditor did not observe evidence of litter proliferation on the site. Review of inspection records indicates measures are implemented to identify and rectify litter issues.	C	C	-	-



Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
71	O7.4	The applicant must control pests and vermin at the premises.	<i>Refer to Condition 43</i>	<i>Refer to Condition 43</i>	Refer to Condition 43: 'Some pest control is undertaken at the site, though this is limited to rodents and insects. The auditor observed fox prints in surface soils at two locations during the site inspection. The auditor notes that fox activity was observed during the Cardno audit of 2016, and that this was the trigger for recommendations in relation to feral animal control. Feral animal management therefore appears to be an ongoing issue at the site.'	C	OBS	-	<i>Refer to Condition 43</i>
72	O7.5	The licensee must ensure that adequately trained staff are available at the premises in order to administer the requirements of this licence.	Document review Visual inspection	Training records (training matrices, training certificates for a sample of mobile plant operators.  Visual observation of site activities.	The auditor was informed that an environmental consulting firm (Environ) are contracted to undertake the monitoring requirements of this licence. The auditor observed representatives from this firm on site during the audit.	C	C	-	-
73	O7.6	All vehicles leaving the premises must be first put through an operating wheel wash except those that have not been in the material processing and storage areas.	Visual inspection	-	The auditor observed heavy vehicles driving through the wheel wash prior to leaving the site.	C	C	-	-
<b>5: Monitoring and Recording Conditions</b>									
74	M1.1	Monitoring records must be in a legible form, kept for at least 4 years and able to be produced in a legible form to any authorised officer of the EPA who asks to see them.	Document review	Surface water, groundwater and dust monitoring records for the audit period and corresponding consultants reports.  Field sampling notes dated: August 2016 February 2016 February 2017 July 2015 May 2016 November 2015 November 2016	The auditor has sighted noise, surface water, groundwater and dust monitoring records and notes that they are legible.	C	C	-	-
75	M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Document review	<i>refer to above</i>	<i>refer to above</i>	C	C	-	-
76	M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Document review	Field sampling notes dated: August 2016 February 2016 February 2017 July 2015 May 2016 November 2015 November 2016	Field notes contain the required information.	C	C	-	-
77	M1.4	The licensee must record the date, duration and volume of any leachate discharged to surface water.	-	-	The auditee indicates no leachate has been discharged to surface water during the audit period.	NT	NT	-	-

Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
78	M2.1	<u>Technical requirements for air monitoring:</u> For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Document review	Dust Deposition Monitoring Records for EPL 20121 and 13426  2015-16 and 2014/15 annual returns for EPL 20121  Air Quality Monitoring Reports prepared by Pacific Environment and Thompson Environmental Systems for the periods: - 2016 Q3 - 2016 Q2 - 2016 Q1 - 2015 Q4 - 2015 Q3	The auditor reviewed air quality monitoring reports / data from the referenced sources and did not observe any exceedances of the air quality licence limits on an annualised average basis.	C	C	-	-
79	M2.2	<u>Technical requirements for air monitoring:</u> 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.	Document review	Dust Deposition Monitoring Records for EPL 20121 and 13426  2015-16 and 2014/15 annual returns for EPL 20121  Air Quality Monitoring Reports prepared by Pacific Environment and Thompson Environmental Systems for the periods: - 2016 Q3 - 2016 Q2 - 2016 Q1 - 2015 Q4 - 2015 Q3	The auditor understands air quality sampling was undertaken at the site in accordance with the licence conditions. It is noted however that sample recovery rates from the high volume PM10 monitoring equipment were low in some sampling periods. The auditor understands that this issue has now been resolved.	C	OBS	-	-
80	M2.3	Air Monitoring Requirements <referred the table on Page 17 of the EPL>	Document review	Air Quality Monitoring Reports prepared by Pacific Environment and Thompson Environmental Systems for the periods: - 2016 Q3 - 2016 Q2 - 2016 Q1 - 2015 Q4 - 2015 Q3	Air monitoring is believed to have been undertaken in accordance with the method and at the frequency specified in the table.	C	C	-	-
81	M3.1	<u>Technical requirements for air monitoring:</u> Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	Document review	Air Quality Monitoring Reports prepared by Pacific Environment and Thompson Environmental Systems for the periods: - 2016 Q3 - 2016 Q2 - 2016 Q1 - 2015 Q4 - 2015 Q3	Air monitoring is believed to have been undertaken in accordance with the required methodologies.	C	C	-	-
82	M4.1	<u>Weather station:</u> Wind strength and wind direction at the premises must be measured and recorded in degrees and knots/kmh at least every 15 minutes.	Document review.	One week sample of weather data provided from onsite weather station	The auditor has sighted a sample of the data from the on-site weather station and notes wind speed is recorded in accordance with licence conditions.	C	C	-	-
83	M4.2	<u>Weather station:</u> Rainfall at the premises must be measured and recorded in millimetres per 24 hour period, at the same time each day.	Document review.	A sample of weather data from onsite weather station.	ERM has reviewed a revised sample of rainfall data provided by the weather station, depicting rainfall in mm.	C	C	-	-

# Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
84	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.	Document review.	Genesis Complaints Register, provided by NSW EPA April 2017	The auditor has reviewed the Genesis Complaints Register, provided by the NSW EPA and available on the DADI website	C	C	-	-
85	M5.2	The [complaint] 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.	Document review.	Genesis Complaints Register, provided by NSW EPA April 2017	The auditor has reviewed the complaints register and is of the opinion that the register substantially captures the information required, noting that all required information is not always provided by agencies that capture and pass on the complaint details.	C	C	-	The auditor recommends the auditee make every effort to collect and retain information pertinent to each complaint.
86	M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Document review.	Genesis Complaints Register, provided by NSW EPA April 2017	The complaint register contains complaints dating to project commencement.	C	C	-	-
87	M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Document review.	Available on the Genesis website.	While this condition is not believed to have been triggered during the audit period, the register is available on the DADI website in the event it is required by an EPA officer.	C	C	-	-
88	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.	Inspection. <i>(telephone complaints line)</i>	-	The auditor telephoned the complaint line to confirm it was a monitored telephone line.	C	C	-	-
89	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.	Document review.	Review of DADI Website	The complaints line was not advertised on the DADI website at the time of the audit as the auditee indicates the website had been the subject of recent technical issues. The auditee indicates that the complaints line had been advertised for the majority of the audit period (over 95%). The auditor is of the view that this condition may be viewed as substantially compliant.	C	C	-	-
90	M6.3	The preceding two conditions do not apply until either the date of the issue of this licence	-	-	-	NOTED	NOTED	-	-
91	M7.1	<u>Soil Classification Records</u>  The licensee must keep a record of each load of Soil, as referred to under Condition L3.1, that is received at the premises. The record must include, but not necessarily be limited to, the following: (a) a copy of the waste classification report in accordance with the Waste Classification Guidelines, including the classification and the limits specified in the L3.1 table; (b) the quantity (in tonnes) of the Soil received; (c) the date and time that the Soil were received; (d) the registration number of the vehicle transporting the Soil to the premises; (e) the source(s) and address from where the Soil were received; and (f) the name and contact details of the company or individual delivering the Soil to the premises. The record must be retained at the premises for at least 4 years after the receipt of the load of the soil. The record must be produced to any authorised officer of the EPA upon request.	Document review.	Records for incoming loads of waste soil for the sample date 30/5/2017, specifically Job Reports: Job # SCH009138 Job # SCH009135 Job # SCH009154 Job # SCH008583 Job # SCH009156  Waste classification reports prepared by Douglas Partners, EI Australia, Ground Technologies, Airsafe and Cardno for the above-listed jobs / loads.  Weighbridge dockets: GEN415732 GEN415454 GEN415394	The auditor understands that job numbers are assigned to every incoming load of waste delivered to site and that records are stored within an electronic tracking system. Soil waste classification reports are a required to be appended to each applicable job, along with weighbridge dockets.  Review of documentation indicates that the information required by (a) through (e) is captured within the job information. Information required under item (f) was not evident in the documentation provided however it is understood these loads were picked up by DADI rather than delivered by the customer or haulage contractor.  It is noted that the weighbridge dockets do not reference the job number or the waste classification report details (and vice versa) which renders audit of records problematic. Nevertheless the auditee has been able to retrieve required information upon request, which indicates the manner of storage within their electronic system permits traceability.	C	C	-	-

Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
92	M7.2	The proponent must provide an annual audit of the design, operation and odour management practices of the operation with the primary aim of identifying improvements that lead to attainment of best practice in regard to minimising odour emitted from the premises. The proponent must implement all reasonable audit recommendations. The scope of such an audit to be regularly reviewed in consultation with the EPA.	Document review.	KMH Odour Assessment dated 20 March 2017 and 2 May 2016	<p>The auditee provided the auditor with a copy of a field odour report prepared by KMH Environmental and Stephenson Environmental Management Australia dated 20 March 2017. The report also includes discussion of the design, operation and odour management practices at the site. The report does not make any recommendations as such were not believed to be necessary.</p> <p>The 2016 odour assessment presents the results of a field ambient odour assessment. The 2016 assessment identifies odour emissions of 4-7 od on the boundary of the landfill void, which exceed the adopted Impact Assessment Criteria. It is noted that the field odour assessment does not consider the 'design, operation and odour management practices of the operation with the primary aim of identifying improvements' and hence cannot be considered to meet all of the requirements of this EPL condition.</p> <p>Further, the scope of the odour assessments have not been reviewed in consultation with the EPA.</p>	C	NC	LOW	<p>Commission a suitably qualified consultant to undertake an annual audit of the design, operation and odour management practices of the operation with the primary aim of identifying improvements that lead to attainment of best practice in regard to minimising odour emitted from the premises. Ensure the scope of such an audit to be regularly reviewed in consultation with the EPA.</p> <p>Note: in the event EPL condition M7.2 is removed from any future variation of the licence, this recommendation shall be considered redundant.</p>
93	M7.3	The EPA may require the proponent to conduct assessments or investigations that identify the extent of any potentially offensive odour emissions beyond the boundary of the premises. The scope of such investigations to be agreed to by the EPA and may include revised air dispersion modelling based on actual site emissions data, well designed field investigations according to German standards, and/ or use of field olfactometers, and analysis of detailed complaints records and on-site meteorological data.	-	-	No such assessments or investigations are believed to have been requested during the audit period.	NT	NT	-	-
<b>6: Reporting Conditions</b>									
94	R1.1	<u>Annual return documents:</u> The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: a) a Statement of Compliance; and b) a Monitoring and Complaints Summary. 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.	Document review.	2015-16 and 2014/15 annual returns for EPL 20121	The reviewed annual returns include: a) a Statement of Compliance; and b) a Monitoring and Complaints Summary.	C	C	-	-
95	R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Document review.	2015-16 and 2014/15 annual returns for EPL 20121	The auditor sighted an annual return for each year of the audit timeframe.	C	C	-	-
96	R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.	-	-	-	NT	NT	-	-
97	R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	-	-	-	NT	NT	-	-
98	R1.5	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Document review.	2015-16 and 2014/15 annual returns for EPL 20121	The auditor reviewed the covering letter dates and delivery details on 2015-16 and 2014/15 annual returns for EPL 20121 and notes the returns were submitted within the 60 day period.	C	C	-	-
99	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.	Document review.	Past four years of annual returns	The auditor sighted copies of the past four years of annual returns	C	C	-	-

# Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
100	R1.7	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Document review.	2015-16 and 2014/15 annual returns for EPL 20121	The auditor is satisfied that this matter is not necessarily a non compliance, however it is a matter that should be further investigated prior to the next IEA.	C	OBS	-	Confirm the acceptability of signing annual returns by power of attorney prior to the next IEA.
101	R2.1	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.	Document review.	Genesis Incident Report Form and Register	Review of Genesis Incident Report Form and Register indicates material incidents were not reported for the audit period.	NT	NT	-	-
102	R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	-	-	Review of Genesis Incident Report Form and Register indicates material incidents were not reported for the audit period.	NT	NT	-	-
103	R2.3	If the results of surface water quality monitoring in the sediment pond(s) required by condition M2.2 indicate ammonia concentrations greater than 1mg/L the licensee must contact the EPA within 24 hours and advise of the results of that monitoring.	Document review.	Surface Water Quality Monitoring EPL 20121 data - published on the DADI website	The auditor reviewed the surface water monitoring data for the audit timeframe and did not observe any exceedances of licence limits for ammonia.	NT	NT	-	-
104	R2.4	If leachate is discharged to surface waters from the premises the licensee must notify the event to the EPA in accordance with condition R3.1.	-	-	The auditee advised the auditor that no leachate was discharged to surface waters during the audit period.	NT	NT	-	-
105	R2.5	The licensee must provide written details of any leachate discharge(s) referred to in Condition 2.3 to the EPA within 7 days of the date on which the incident occurred.	-	-	-	NT	NT	-	-
106	R2.6	In the event of a fire at the facility the licensee must record: a) the time and date when the fire was deliberately started or reported; b) whether the fire was authorised by the licensee, and, if not, the circumstances which ignited the fire; c) the time and date that the fire ceased and whether it burnt out or was extinguished; d) the location of fire; e) the prevailing weather conditions; f) any observations made in regard to smoke direction and dispersion; g) the amount of waste that was combusted by the fire; and h) the action taken to extinguish the fire.	-	-	The auditee advised the auditor that no fires occurred on the site during the audit period.	NT	NT	-	-
107	R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	-	-	-	NOTED	NOTED	-	-
108	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.	Document review	Review of correspondence with the EPA.	The auditee indicated to the auditor that the EPA have not requested any written reports in regards to an event during the audit period in relation to material environmental harm.  The auditor has reviewed the requirements of Clean-Up Notice 1549945 issued on 21-Mar-2017. The notice requires investigation on the part of the licensee and their environmental consultant and the provision of these findings to the EPA by a specified date. Review of the response by DADI indicates it was provided within the specified time period.	NT	C	-	-

Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
109	R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	-	-	-	NOTED	NOTED	-	-
110	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.	-	-	-	NT	NT	-	-
<b>7: General Conditions</b>									
111	G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Visual inspection	-	The auditor sighted a copy of the EPL in the site offices.	C	C	-	-
112	G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Visual inspection	-	The auditee indicates the EPA have visited the site a number of times during the audit period and indicate the EPA requested a copy of the licence in each instance and it was produced upon request.	C	C	-	-
113	G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Visual inspection.	-	The EPL is stored electronically in the DADI file system.	C	C	-	-
<b>8: Special Conditions</b>									
114	E1.1	(a) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA prior to the issue of an environment protection licence for the premises. The financial assurance must be in favour of the EPA in the amount of two hundred thousand dollars (\$200,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. (b) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the banking Act 1959 of the Commonwealth of Australia and supervised by APRA must be provided to the EPA by 31 May 2013. The financial assurance must be in favour of the EPA in the amount of two hundred thousand dollars (\$200,000). Note that this total financial assurance is inclusive of that required in E1.1a) and E1.1b). (c) The licensee must provide to the EPA, along with the original counterpart guarantee, confirmation in writing that the financial institution providing the guarantee is subject to supervision by APRA.	Document review	Bankers Undertaking (15 May 2012)	A copy of a bankers undertaking date 15 May 2012 was sighted by the auditor. The bankers undertaking was reflective of the necessary value.	C	C	-	-
115	E1.2	An adjustment to the financial assurance must be calculated, each licence review period, in line with the Consumer Price Index for the number of years since the financial assurance was last paid. The financial assurance must be replenished to the full amount plus CPI adjustments each licence review period.	-	-	No licence reviews have been undertaken in the audit period.	NT	NT	-	-



Table 1 - Environmental Protection Licence 20121



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
116	E1.3	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.	-	-	-	NT	NT	-	-
117	E1.4	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.	-	-	-	NT	NT	-	-
118	E1.5	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	-	-	-	NT	NT	-	-
119	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 being required by condition E1.1, or b) the adjusted financial assurance as required by condition E1.2 and E1.3.	-	-	-	NT	NT	-	-
120	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.	-	-	-	NOTED	NOTED	-	-
121	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.	Document review. Visual inspection Staff interviews	Incident register for the site.	The auditor did note observe any staining or evidence of spills during the audit site visit.  The auditor interviewed the driver of a mobile plant refuelling tanker and the driver indicated he was not aware of the procedure for the clean up of spills.  It is unclear from the incident register provided by the licensee, how many environmental incidents have occurred during the audit period and the nature of these incidents.	C	OBS	-	Ensure all relevant staff are trained in the clean up and reporting of spills.
122	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: a) make all efforts to contain all firewater on the licensee's premises, b) make all efforts to control air pollution from the licensee's premises, c) make all efforts to contain any discharge, spill or run-off from the licensee's premises, d) make all efforts to prevent flood water entering the licensee's premises, e) remediate and rehabilitate any exposed areas of soil and/or waste, f) lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of, g) at the request of the EPA monitor groundwater beneath the licensee's premises and its potential to migrate from the licensee's premises, h) at the request of the EPA monitor surface water leaving the licensee's premises; and i) ensure the licensee's premises is secure.	Document review.	Pollution Incident Response Management Plan MPC (DADI, JUNE 2016)	The auditee indicates that no such incidents have occurred during the incident period.	NT	NT	-	Review and revise the Pollution Incident Response Management Plan to improve the document, in particular further detail could be provided in respect to the specific steps that would be taken in response to a potential or actual environmental incidents such as fire, flood, surface water run-off or air pollution events. A key component of site preparation is proactive sediment basin management. As a general guide, sediment basins should be flocculated and dewatered within five days of a rainfall event that fills the basin to a level in excess of one quarter of the design capacity. Prompt flocculation and dewatering of basins after rain will minimise the likelihood of overflow in the event of follow up rainfall.
123	E3.3	After the licensee's premises ceases 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: a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises and; b) rehabilitate the premises, including conducting an assessment of and if required remediation of any site contamination.	-	-	-	NT	NT	-	-

Table 2 - Environmental Protection Licence 13426



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
<b>Compliance Assessment Criteria:</b> C - Compliant NC - Non-Compliant ANC - Administrative non-compliance NV - Not Verified NT - Not Triggered OBS - Observation NOTED									
<b>1: Administrative Conditions</b>									
124	A1.1	This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2. There are three stages to the scheduled development works of which the following stages are authorised by this licence: Stage 2B, Construction of Leachate System, Conveyor and Chute in accordance with A3.2.	-	-	-	NOTED	NOTED	-	-
125	A1.2	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.	-	-	-	NOTED	NOTED	-	-
126	A1.3	These licence conditions apply to all activities carried on at the premises, including: a) waste storage, disposal and processing; b) wastewater and/or leachate treatment systems.	-	-	-	NOTED	NOTED	-	-
127	A2.1	The licence applies to the following premises: Genesis Facility	-	-	-	NOTED	NOTED	-	-
128	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. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence	-	-	-	NOTED	NOTED	-	-
<b>2: Discharge to Air and Water and Applications to Land</b>									
129	P1.1	Location of monitoring/discharge points and areas P1.1 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.	-	-	-	NOTED	NOTED	-	-
130	P1.2	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.	-	-	-	NOTED	NOTED	-	-
131	P1.3	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or setting of limits for the emission of noise from the point.	-	-	-	NOTED	NOTED	-	-
<b>3: Limit Conditions</b>									
132	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.  <i>Section 120 Prohibition of pollution of waters reads</i> <i>(1) A person who pollutes any water is guilty of an offence</i> <i>(2) In this section:</i> <i>pollute waters includes cause or permit any waters to be polluted.</i>	-	Sample of results from Leachate Sump and Monitoring Well logger database 12/9/2013 – 19/6/2015  Surface Water Quality Monitoring Records EPL 20121 and 13246  Groundwater Quality	The auditor has reviewed surface and groundwater monitoring results reported in the EPL annual returns for the audit period. No exceedances of licence conditions were identified.	C	C	-	-
133	L1.2	The Licensee must operate the premises in a manner that ensures that all stormwater from all areas of the premises which has the potential to mobilise sediments and other material is controlled and diverted through appropriate erosion and sediment control/pollution control measures and sedimentation ponds.	Document Review	Soil, Water and Leachate Management Plan Contractors certification for the stormwater devices on the site (D&W Plumbing dated 17/11/2011)	The auditor reviewed the Soil, Water and Leachate Management Plan, and is satisfied surface water captured on the site is passed through erosion and sediment control/pollution control measures and sedimentation ponds (specifically the south west and north west sediment basins).  Documentary evidence reviewed indicates surface water management devices were installed on the site in accordance with the designs / plan.	C	C	-	-
134	L1.3	Sediment ponds must be maintained in a manner that ensures these retain an appropriate freeboard to minimise the potential for any turbid discharge. Depth indicators must be installed and maintained within these ponds that indicate the required freeboard to be maintained.	Visual inspection Document review	Invoice from Davcol Pty Ltd for the "Service and cleaning of two storm water gross pollutant traps" including minor servicing every 3 months and one major service per year for the period 2015 - 2016.	The auditor observed that the water levels in the sediment basins were below the depth indicators on the date of the audit. Maintenance records suggest sediment basins are maintained periodically (at least every 3 months).  The licensee indicates they monitor water levels to minimise the potential for discharge of turbid water and the auditor has sighted periodic (believed to be quarterly) monitoring data for water within the basins. Quarterly monitoring is not considered sufficiently frequent to mitigate the risk of discharges of turbid water from the basins. Furthermore the actions to be taken in response to high water levels or the presence of turbid water are not presently documented leaving the management response unclear.	C	OBS	-	Refer to the recommendations made for audit criteria #51.
135	L1.4	Surface water must be diverted away from any area where waste is being landfilled.	Document Review Visual Inspection	Soil, Water and Leachate Management Plan	The auditor sighted the surface water management system in the pit and notes that surface water draining into the pit via the walls is captured by a bund and diverted to a clean water dam from where it is recovered for re-use (dust suppression etc). Soil, Water and Leachate Management Plan describes this process.	C	C	-	-



Table 2 - Environmental Protection Licence 13426



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
136	L2.1	For each monitoring/ discharge point or utilisation area specified in the table\`s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Document review.	Surface Water Quality Monitoring for EPL 13426 and 20121 - data obtained from the DADI website.	Review of EPL monitoring data indicates no EPL surface water quality limits were breached in the audit period in relation to EPL 13426.	C	C	-	-
137	L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Document review.	Surface Water Quality Monitoring for EPL 13426 and 20121 - data obtained from the DADI website.	Review of EPL monitoring data indicates no EPL surface water quality limits were breached in the audit period in relation to EPL 13426.	C	C	-	-
138	L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\`s.	-	-	-	NOTED	NOTED	-	-
139	L2.4	The licensee is not taken to have exceeded a concentration limit specified in this licence, for monitoring points 5 and 6, if the discharge has occurred solely as a result of a rainfall event at the premises exceeding a total of 45 millimetres over any consecutive five day period and the licensee has taken all practical measures to avoid or minimise water pollution.	Document review.	Water quality monitoring data published on the DADI website.	Review of monitoring data indicates no data has been collected in relation to sediment basin overflow (points 5 and 6) during the audit period. The auditor is informed by the auditee that the basins did not overflow during the audit timeframe and concentration limits for monitoring points 5 and 6 were not exceeded during the monitoring period.	NT	NT	-	-
140	L2.5	Water and/or Land Concentration Limits (refer to table on page 11)	Document review.	Surface Water Quality Monitoring EPL 13426 and 20121	Review of monitoring data indicates no data has been collected in relation to sediment basin overflow (points 5 and 6) during the audit period. The auditor is informed by the auditee that the basins did not overflow during the audit timeframe and concentration limits for monitoring points 5 and 6 were not exceeded during the monitoring period.	C	C	-	-
141	L3.1	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. <refer to page 11 of the EPL>	Document review.	Genesis Spotters Training Manual Rejected loads register Waste classification records	The auditor has reviewed the systems utilised by DADI to identify and exclude non approved types of waste and notes systems are in place to identify and reject non approved wastes. No evidence has been sighted to the effect non approved wastes were permitted to be brought into the landfill.	C	C	-	-
142	L3.2	The Licensee must not landfill more than 700, 000 tonnes of non-putrescible waste per calendar year.	Document review.	Volumetric survey dated December 2016 (for the period 1 January to 30 June 2016)	Review of the volumetric surveys for the period 1 January to 30 June 2016 and 30 June to 31 December shows a discrepancy between waste in and waste out of 33,158t and 19,005t, suggesting a total of 52,163 t were landfilled in the calendar year.	C	C	-	-
143	L3.3	Except for the following, the Proponent shall dispose of all outputs produced from the waste processing and/or resource recovery facility on site, subject to Environment Protection Licence 20121, to the Landfill:  a) Recyclables extracted and delivered off-site for resource recovery purposes; b) Hazardous wastes extracted from the input waste stream and lawfully disposed of off-site; and c) Output waste derived materials approved for use under the Protection of the Environment Operations Act, 1997 and Regulations.	Document review.	Various Volumetric surveys of landfill for license No. 13426 dated 2013 - 2015 with photograph displaying numbered stockpiles  Waste Contribution Monthly Report December 2014, January 2014, September 2013	The auditor notes that the NSW EPA issued Show Cause Letter 1546716 to DADI in relation to 'Exhuming of Waste'.  The auditor is satisfied that while the waste was transported into the landfill void via the chute, it had yet to be landfilled (either compacted or buried) and as such exhumation is not believed to have occurred.  The auditee advised the auditor that the materials in question were being sent to an alternative facility for further processing. This facility is understood to be the 'Greenspot' landfill and recycling facility. The auditor has been unable to verify whether the material was indeed subject to resource recovery or whether it was landfilled at the greenspot facility.	C	NV	-	In order to demonstrate compliance with licence condition, it is recommended that for every consignment of material transported off site for resource recovery, DADI obtain written confirmation from the organisation accepting the waste that it was received for the purpose of recycling (noting that landfilling of such waste is inconsistent with licence condition L3.3).

Table 2 - Environmental Protection Licence 13426



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
144	L3.4	The applicant must have in place and implement procedures to identify and prevent the disposal of any waste not permitted by condition L3.1 to be disposed of at the premises.	Document review.	Genesis Spotters Training Manual  Records of rejected loads  Incoming product waste classification reports.	The auditor has reviewed the systems utilised by DADI to identify and exclude non approved types of waste and notes systems are in place to identify and reject non approved wastes. No evidence has been sighted to the effect non approved wastes were permitted to be brought into the landfill.	C	C	-	-
145	L3.5	The Licensee is only permitted to dispose of Immobilised waste which has been assessed as General Solid Waste (non-putrescible) and is subject to the general immobilisation approvals as set out in the following: a) "2009/07 Metallurgical furnace slag or metallurgical furnace slag contaminated natural excavated materials" b) "1999/05 Ash, ash-contaminated natural excavated materials or coal-contaminated natural excavated materials"	-	-	-	NOTED	NOTED	-	-
146	L4.1	Noise generated from the Landfill must not exceed the noise limits presented in the table below <refer to page 13 of the EPL>	Document review	Genesis Eastern Creek Compliance Noise Assessment (Pacific Environment, 2015, 2016)	A noise monitoring programme is implemented on site (on a six monthly basis). Results of the programme indicate noise from the facility was not audible within the ambient noise environment at monitoring locations.  The same reports describe the preparation of a noise model to better characterise noise impacts of the facility. The report concludes that the results of the calibrated model indicate the facility complies with specified EPL noise limits at the nearest residential receivers.	C	C	-	-
147	L4.2	Notes: a) Noise from the development is to be measured at the most affected point or within the residential boundary, or at the most affected point within 30 metres of a dwelling (rural situations) where the dwelling is more than 30 metres from the boundary, to determine compliance with the LAeq (15 minute) noise limits. Where it can be demonstrated that direct measurement of noise from the project is impractical, the DECC may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable. b) The noise emission limits identified apply under meteorological conditions of: · Wind speed up to 3m/s at 10 metres above ground level; or · Temperature inversion conditions of up to 3°C/100m and wind speed up to 2m/s at 10 metres above the ground.	Document review.	Genesis Eastern Creek Compliance Noise Assessment (Pacific Environment, 2015, 2016)	The auditor understands noise monitoring has been undertaken in compliance with licence conditions	C	C	-	-
148	L4.3	Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2. <refer to page 14 of the EPL>	Document review	Genesis Eastern Creek Compliance Noise Assessment (Pacific Environment, 2015, 2016)	A noise monitoring programme is implemented on site (on a six monthly basis). Results of the programme indicate noise from the facility was not audible within the ambient noise environment at monitoring locations.  The same reports describe the preparation of a noise model to better characterise noise impacts of the facility. The report concludes that the results of the calibrated model indicate the facility complies with specified EPL noise limits at the nearest residential receivers.	C	C	-	-
149	L5.1	Operating hours for all activities at the Premises must be limited to between 7:00am and 6:00pm Monday to Friday, and 8:00am to 4:00pm Saturday, Sunday and Public Holidays.	Document review	Employee clock on and off records	The auditor sighted the hours of operation stated on the front site entry and reviewed a sample of employee clock on and off data sheets for four days within the audit period. No instances of staff clocking on before 6.00 am or after 6 pm were observed.	C	C	-	-
150	L5.2	Operating hours of the conveyor and chute system are restricted to the facilities operational hours as specified in Condition L5.1.	Document review	Employee clock on and off records	The auditor sighted the hours of operation stated on the front site entry and reviewed a sample of employee clock on and off data sheets for four days within the audit period. No instances of staff clocking on or off outside of the operational hours were observed. It is noted that the conveyor and chute only operates when the plant is in operation.	C	C	-	-
151	L6.1	No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997. 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	-	Genesis Zero Waste Facility: Field Ambient Odour Assessment and Review Study (The Odour Unit, August 2015)  Genesis Complaints Register	-	NOTED	NOTED	-	-

4:Operating Conditions

Table 2 - Environmental Protection Licence 13426



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
152	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.	Document review Visual inspection	Staff training records (Asbestos awareness workshop - 27 Apr 2017) and general skills and training matrix  A sample of the operators tickets to operate mobile plant.  EHS Procedures and Instructions including SWMS for operation of a range of mobile plant.	Competence, in the auditors opinion, is the demonstrated ability to implement skills and knowledge. The auditor has reviewed a range of evidence and is satisfied that employees on the site possess sufficient knowledge and skills to perform their roles. All operations reviewed during the site audit were being implemented in a competent manner, and the auditor is of the view that activities at the site are generally carried out in a competent manner.	C	C	-	-
153	O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Document review Interviews with staff. Visual inspection	Plant and equipment maintenance records  Staff training records  MPC Maintenance Shift Reports	The auditor has reviewed a range of information and is of the opinion that plant and equipment at the site is maintained and operated in proper and efficient manner.	C	C	-	-
154	O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	Document review Visual inspection	Dust suppression - water cart operating schedule/operator work records  Air Quality Monitoring Reports: - 2016 Q3 - 2016 Q2 - 2016 Q1 - 2015 Q4 - 2015 Q3	The site employs dust controls including sprinklers on outdoor stockpiles, fine mist sprays in the MPC building and a water cart for internal roads. The auditor did not observe excessive dust generation during the site visit.  Review of air quality monitoring reports indicate the site was generally compliant with dust related licence conditions during the audit period, suggesting the site is maintained in a condition which minimises dust.	C	C	-	-
155	O3.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	Visual inspection	-	The auditor reviewed a sample of truck movements during the site audit (approximately 5 minutes watching trucks entering and leaving the site). No noncompliant trucks were observed.	C	C	-	-
156	O4.1	The licensee must take all practicable steps to control entry to the premises.	Visual inspection Document review	Visual Inspection  Invoices from Security contractor.	A lockable gate is located at the boundary of the site. The auditor has sighted four invoices issued by Nycon Security which indicate an ongoing security management system at the site.	C	C	-	-
157	O4.2	The Licensee shall: a) Implement suitable measures to manage pests, vermin and declared noxious weeds on site; b) Inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area; and c) Perform ongoing monitoring of weed infestation on and adjoining the site.	Visual inspection Document review	Pests, Vermin Feral Animals and Declared Noxious Weeds Management Plan, Revised 16 March 2017  Dial a Dump Industries Eastern Creek Bushland Restoration Works Program 2017 Financial Year (Earth Repair and Restoration)  Weed Management Reporting (record of weed control activities) dated: - February 2017 - June 2016 - September 2016 - November 2016	Active and regular weed control activities appear to have been undertaken at the site during the audit timeframe. The success of these activities cannot be verified due to a lack of weed monitoring.  Some pest control is undertaken at the site, though this is limited to rodents and insects. The auditor observed fox prints in surface soils at two locations during the site inspection. The auditor notes that fox activity was observed during the Cardno audit of 2016, and that this was the trigger for recommendations in relation to feral animal control. Feral animal management therefore appears to be an ongoing issue at the site.	C	NC	LOW	Refer to recommendation from Audit Criteria #43
158	O4.3	The Licensee must have in place and implement procedures to minimise the risk of fire at the premises.	Visual inspection Document review	EHS System Procedure - 'Minimising the Risk of Fire' dated February 2016  Landfill Supervisor Compliance WVT's - Daily, Fortnightly and Monthly Checks	The auditor has reviewed the referenced document and undertaken opportunistic inspection for the presence of fuel across the site.  Noting that ERM does not provide fire safety advice, in the auditors opinion generally adequate procedures are in place to minimise the risk of fire at the premises. It is recommended however that checks for the maintenance of the asset protection zones are included within the monthly landfill supervisor checks to ensure compliance with the Bushfire Hazard Assessment (Holmes Fire and Safety, 2008).	C	C	-	Refer to Audit Criteria 46

Table 2 - Environmental Protection Licence 13426



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
159	O4.4	The Licensee must minimise the tracking of waste and mud by vehicles leaving the premises.	Visual inspection	Visual inspection	Visible mud was not observed on surface roads in the course of the audit. The auditor observed trucks utilising the wheel wash.	C	C	-	-
160	O5.1	The licensee must have in place and operate a calibrated weighbridge to record the weight in tonnes of all waste brought into the premises and to determine the occupier's section 88 levy liability.	Document review	Weighbridge calibration records dated 20 September 2016 Green Star – Construction & Demolition Waste Reporting Criteria Compliance Verification Summary “Waste Processing Facilities”	The auditor has reviewed weighbridge calibration certificates and confirms that these calibration certificates demonstrate the site has a calibrate weighbridge. A sample of jobs have been reviewed and tonnages are recorded.	C	C	-	-
161	O5.2	There must be no incineration or burning of any waste at the premises.	Visual inspection, staff interview	Interviews with staff WVI checklist (routine visual inspection checklist)	The auditor did not observe evidence of any burning of waste on the site.	C	C	-	-
162	O5.3	The licensee must not exhum any landfilled waste at the premises unless written approval is given by the EPA.	Document review.	Various Volumetric surveys of landfill for license No. 13426 dated 2013 - 2015 with photograph displaying numbered stockpiles Waste Contribution Monthly Report December 2014, January 2014, September 2013	The auditor notes that the NSW EPA issued Show Cause Letter 1546716 to DADI in relation to 'Exhuming of Waste'.  The auditor is satisfied that while the waste was transported into the landfill void via the chute, it had yet to be landfilled (either compacted or buried). It is therefore the auditors opinion that insufficient evidence has been sighted to form the view that exhumation has occurred. This finding has been made based on the information provided by the licensee for the purpose of this audit and should not be taken as legal opinion.	C	C	-	-
163	O5.4	Cover material must be: a) Daily Cover  Daily Cover must be either: i) virgin excavated natural material, or ii) approved alternative daily cover. Cover material must be applied to a minimum depth of 15 centimetres over all exposed landfilled waste prior to ceasing operations at the end of each day. b) Intermediate Cover must be virgin excavated natural material. Cover material must be applied to a depth of 30 centimetres over surfaces of the landfilled waste at the premises which are to be exposed for more than 90 days. c) Cover material stockpile At least two weeks cover material must be available at the premises under all weather conditions. This material may be won on site, or alternatively a cover stockpile must be maintained adjacent to the tip face.	Document review.	Letter from DADI to EPA dated 19 December 2012 re proposed license variations (p 2) Assessment/Justification for a Trial Use of Concover (19 December 2012)	The auditee indicates that the landfill uses 'concover', a thin polymer coating used as an alternative to soil. This is applied in thin layers, hence the depths specified do not apply. Item B is not triggered during the audit period. Item C is compliant.	C	C	-	-
164	O5.5	The licensee shall ensure that at no time is asbestos waste (as defined in the POEO Act) permitted to be placed in the conveyor/chute system for conveyance to the base of the landfill.	Document review. Visual inspection.	Dial a Dump Industries EMS Conveyor and Chute Waste Handling Procedures (June 2011) Asbestos Management Plan (DADI, February 2014)	The operation implements a number of procedures to identify asbestos within incoming loads. Loads containing asbestos are deposited within designated skip bins or taken directly into the landfill void for disposal. The auditor understands the operation utilises an asbestos identification gun to screen potentially asbestos containing materials whereupon they can be transported into the pit by truck. On the balance of probabilities the auditor is of the opinion that it is unlikely asbestos is transported into the landfill void using the chute system.	C	C	-	-
165	O5.6	The licensee must not carry out any activity that exposes previously landfilled waste at the premises, except as expressly permitted by a condition of this licence.	Visual inspections and document review	landfill daily procedures	The auditor has not identified any evidence of such activity.	C	C	-	-
166	O5.7	Landfill leachate must not be irrigated except as expressly permitted by a condition of this licence.	Visual inspection of water cart filling, interview driver, inspect leachate connection to sewer, document review.	Trade waste disposal records for leachate disposal. The Leachate Collection, Conveyance and Management System (Crespi Projects, 2011)	While it is not possible to entirely exclude the possibility of irrigation containing leachate, the auditor is of the opinion that this is a relatively unlikely scenario, given the availability of clean harvested surface water on the site.	C	C	-	-
167	O5.8	Water which contacts waste, other than virgin excavated natural material, must be managed as leachate. Leachate must only be disposed of by: a) disposal to sewer via a trade waste agreement, b) disposal at a facility licensed to accept such waste.	Document review. Visual inspection.	Visual inspection The Leachate Collection, Conveyance and Management System (Crespi Projects, 2011). Trade Waste Discharge Monitoring Records	The auditor has reviewed a sample of trade waste disposal records, and has sighted the leachate recovery and storage system. The auditor understands leachate is disposed of via a trade waste agreement with Sydney Water, an organisation licenced to accept such waste.	C	C	-	-
168	O5.9	The licensee must only dispose of waste within the landfill void.	Document review.	Volumetric surveys of landfill for license No. 13426 dated 2015 - 2016	The auditor takes the view that this condition is unrelated to the off-site transport of waste for resource recovery, further processing or landfilling. The auditor has not sighted any evidence of landfilling elsewhere on the site (other than the landfill void).	C	C	-	-

Table 2 - Environmental Protection Licence 13426



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
169	O5.10	The licensee must submit and maintain a filling plan for the disposal of waste sequentially in each landfill cell(s). This Filling plan must be updated at intervals of no greater than 12 months.	Document review.	Document review.	The Auditor sighted the filling plans referenced. The auditor has not sighted evidence that the filling plans have been submitted to the EPA.	C	NC	LOW	Submit a copy of the revised filling plan to the EPA for comment annually.
170	O5.11	The Basal cell lining shall be constructed in accordance with the Douglas Partners June 2011 Report entitled "Environmental Management Strategy June 2011 - Leachate Collection and Conveyance System" and in compliance with the NSW EPA Solid Landfill Guidelines, 1996 Benchmark Techniques 1 and 2. This includes the QA/QC and testing program specified in that report.	-	-	This licence condition was not triggered during the audit period. The reader can find the relevant information in the document titled 'Construction Quality Assurance Report on Basal Liner and Leachate Collection System (Douglas Partners, October 2012)'	NT	NT	-	-
171	O5.12	Landfilling of waste and leachate levels must be managed to ensure the groundwater gradient directs groundwater flows inwards towards the landfill void.	Visual inspection Document review.	Leachate level monitoring data	Ongoing pit dewatering is understood to maintain the inward groundwater gradient.	C	C	-	-
172	O5.13	The licensee must ensure that the leachate levels within the landfill below RL 25m AHD are maintained at: (a) No more than RL minus 45m AHD at monitoring point 26; and (b) No more than RL minus 35m AHD at monitoring point 27; and (c) In any case at least 5m below the minimum elevation of the waste surface.	Document review.	Letter from Environ Consulting Services to Mr Rodney Johnson titled 'Management of Groundwater Interception System'	The report presents the data collected during the period of 29th April 2016 to 3rd February 2017 for leachate monitoring well number EPA 27. The data collected by ECS during the monitoring period indicates the site has been operating in compliance with the operating leachate level criterion for EPA 27. Data from EPA 26 has not been sighted and this condition has not therefore been verified in its entirety.	C	NV	-	It is recommended that when data from EPA 26 is obtained, the licensee satisfy themselves as to their compliance with this criteria. In the event any non compliance with this criteria is observed, it is recommended this is communicated to the EPA.
173	O5.14	Before the level of waste in the landfill reaches RL -20m AHD, the Licensee must submit to the EPA a technical report providing a detailed design and construction quality assurance program for the mid floor liner for the EPA's review and approval.	-	-	This condition was not triggered during the audit period	NT	NT	-	-
174	O5.15	No waste is to be emplaced in the landfill above RL -10m AHD until the Licensee has installed a liner in accordance with a design approved by the EPA and the EPA has provided the licensee with written approval to dispose of waste within the above RL -10m AHD.	Document review.	Correspondence with the EPA re PSM	Review of correspondence between the EPA and Pells Sullivan Meynink indicates approval has been granted by the EPA to continue filling past RL -10	C	C	-	-
175	O5.16	One month before the level of waste in the void reaches RL 25m AHD, the Licensee must submit to the EPA: a detailed technical report regarding the upper floor liner; permanent leachate collection system design and; quality assurance program.	-	-	This condition was not triggered during the audit period	NT	NT	-	-
176	O5.17	No waste is to be emplaced in the pit above RL 25m AHD until the licensee has installed a permanent leachate barrier and collection system in accordance with a design approved by the EPA and the EPA has provided the licensee with written approval to dispose of waste in the pit above RL 25m AHD.	-	-	This condition was not triggered during the audit period	NT	NT	-	-
177	O5.18	Prior to construction of the mid floor (-10m AHD) and upper floor liners (25 AHD) and permanent leachate collection systems, the licensee must submit to the EPA a detailed design report including a construction quality assurance (CQA) program. The report must contain: details of the engineered features of the liner and leachate collection and conveyance system, leachate storage and disposal infrastructure, stormwater management controls, gas management system, proposed daily and intermediate covering, proposed filling plan and groundwater and gas monitoring networks. This must include detailed plans and specifications and full "for construction" engineering drawings. The CQA program must contain sufficient details of the proposed installation methods, tests, inspections and other verifications to demonstrate that all materials and constructed features will conform to the required plans and specifications. The design report and CQA program must be submitted to the EPA at each stage for approval prior to commencing construction works.	Document review.	Report titled 'Proposed Variation of Licence 13426: Clauses 0.14 to 05.18 relating to mid and upper floor liners; 05.13 relating to leachate levels.' dated 15 January 2015 and prepared by Edison Environmental and Engineering.	The auditor understands the referenced report and a range of associated correspondence has been submitted to the EPA.	C	C	-	-

Table 2 - Environmental Protection Licence 13426



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
178	O5.19	Final capping must be installed in accordance with Benchmark Technique 28 of the EPA's Environmental Guidelines: Solid Waste Landfills (January 1996) or an equivalent cap approved by the EPA in writing.	-	-	This condition was not triggered during the audit period	NT	NT	-	-
179	O5.20	The licensee must submit to the EPA within twelve months prior to the last load of waste being landfilled a closure plan in accordance with Section 76 of the Protection of the Environment Operations Act 1997.	-	-	This condition was not triggered during the audit period	NT	NT	-	-
180	O5.21	The final contours of the landfill must be in accordance with the approved Closure Plan	-	-	This condition was not triggered during the audit period	NT	NT	-	-
181	O6.1	The licensee must manage any groundwater extracted from groundwater interception system in accordance with the report titled "Genesis Landfill Facility - Proposed Groundwater Sump" (Ref:BJ07/LT264 Rev B) by IGGC and dated 9 October 2012.	Document review.	Proposed Groundwater Sump" (Ref:BJ07/LT264 Rev B) by IGGC and dated 9 October 2012.  ENVIRONMENTAL MANAGEMENT STRATEGY (EMS) SOIL, WATER and LEACHATE MANAGEMENT PLAN REVISED MARCH 2017	The auditor understands groundwater that enters the pit through the pit walls becomes surface water whereupon it is captured and diverted to the clean water pond in the landfill. Review of the referenced document suggest groundwater extracted from the groundwater interception system is managed in accordance with the applicable requirements.	C	C	-	-
182	O6.2	The proponent shall: a) Implement suitable measures to prevent unnecessary proliferation of litter both on and off site; and b) Inspect and clear the site and surrounding area, of litter on a daily basis.	Document review. Visual inspection.	WVI inspection (internal routine inspection records)	The auditor did not observe evidence of litter proliferation on the site. Review of inspection records indicates measures are implemented to identify and rectify litter issues.	C	C	-	-
183	O6.3	The applicant must control pests and vermin at the premises.	Visual inspection Document review	Pests, Vermin Feral Animals and Declared Noxious Weeds Management Plan, Revised 16 March 2017  Dial a Dump Industries Eastern Creek Bushland Restoration Works Program 2017 Financial Year (Earth Repair and Restoration)  Weed Management Reporting (record of weed control activities) dated: - February 2017 - June 2016 - September 2016 - November 2016	The auditor is of the opinion that suitable measures to manage pests, vermin and declared noxious weeds are being implemented on the site.	C	C	-	-
184	O6.4	The Licensee must ensure that adequately trained staff are available at the premises in order to administer the requirements of this License.	Document review	Training records (training matrices, training certificates for a sample of mobile plant operators.	The auditor was informed that an environmental consulting firm (Environ) are contracted to undertake the monitoring requirements of this licence. The auditor observed representatives from this firm on site during the audit.  Other staff are deemed to be adequately trained by virtue of their qualifications and certificates of competency relevant to their role.	C	C	-	-
185	O6.5	Bunding must be maintained for the leachate storage tanks that: - is impervious to the fluids contained; and - has sufficient capacity to contain 110% of the volume of the largest vessel; and - will contain all pressurised leaks or spills.	Document review	Certification and Survey of Spill Containment Areas for Genesis Waste Facility Eastern Creek (Environ Consulting Services, 9 August 2016)	Review of the referenced document indicates bunding for the leachate storage tanks is adequate.	C	C	-	-
186	O6.6	The Proponent shall store all chemicals, fuels and oils used on site in an appropriately designed impervious bunded area that contains 110 percent of the largest container contained within the bund. These bunds shall be designed and installed in accordance with the requirements of all relevant Australian standards, and/or EPA's Environment Protection Manual Technical Bulletin Bunding and Spill Management.	-	-	The auditor is advised that chemicals and hydrocarbons are not stored within the portion of the site to which this EPL applies.	NT	NT	-	-

## 5: Monitoring and Recording Conditions

Table 2 - Environmental Protection Licence 13426



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
187	M1.1 - 1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Document review	Surface water, groundwater and dust monitoring records for the audit period and corresponding consultants reports.	The auditor has sighted noise, surface water, groundwater and dust monitoring records and notes that they are legible.	C	C	-	-
188	M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Document review.	Refer to above	Review of field sampling sheets indicates the required information is being recorded.	C	C	-	-
189	M1.4	The licensee must record the date, duration and volume of any leachate discharge to surface water.	-	-	This condition was not triggered during the audit period as no leachate is believed to have been discharged to surface water.	NT	NT	-	-
190	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 (refer to page 19 -21 of the EPL)	Document review.	Surface, groundwater water monitoring records for the site, published on the DADI website.	The auditor has reviewed surface and groundwater monitoring records for the site, published on the DADI website. The monitoring data for points 2, 3, 5 and 6 does not include results for metals, electrical conductivity or total organic carbon.  Review of the groundwater monitoring data published on the DADI website indicates that it does not include a variety of analytes, including metals (other than anions and cations), electrical conductivity and petroleum hydrocarbons / monocyclic aromatic hydrocarbons.	C	NC	LOW	-
191	M2.2	Water and/ or Land Monitoring Requirements	-	Refer to above	-	NOTED	NOTED	-	-
192	M2.3	For the purposes of the table above Special Frequency 1 means the collection of samples: a) on the first day of the authorised discharge that is compliant with Condition L2.1 and weekly thereafter if the discharge continues; and b) within three days of the first day of discharge that is occurring as a result of a rainfall event at the premises. Note: Surface water monitoring requirements and concentration limits for Points 2,3,5,6 will be reviewed by the EPA after one year of monitoring, with a view to reduce or remove these requirements where surface water quality at these Points is deemed not to be impacted by waste or leachate.	-	-	This condition was not triggered during the audit period	NT	NT	-	-
193	M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	-	Letter prepared by Environ Consulting Services titled 'Request for confirmation of compliance with Approved Methods Publication- Genesis Landfill Facility'.	The auditor has been unable to obtain interpretive surface water monitoring reports or other documentary evidence that describes how the surface water monitoring is undertaken. It is noted that surface water monitoring on the site is undertaken by Environ, an environmental consultancy.  The auditor has sighted a letter prepared by Environ Consulting Services titled 'Request for confirmation of compliance with Approved Methods Publication- Genesis Landfill Facility'. The letter states: "ECS can confirm that the groundwater and surface water monitoring conducted during the subject period have been performed in accordance with the sampling and analysis methods to be used when complying with a requirement by, or under, the environment protection legislation, or a license or notice under the legislation, to test for the presence or concentration of matter in water and the volume, depth and flow of water or waste water."	C	C	-	-
194	M4.1	Rainfall at the premises must be measured and recorded in millimetres per 24 hour period, at the same time each day.	Document review.	One week sample of weather data provided from onsite weather station	The auditor has sighted a sample of the data from the on-site weather station and notes wind speed is recorded in accordance with licence conditions.	C	C	-	-
195	M4.2	Wind strength and wind direction at the premises must be measured and recorded in degrees and knots/kmh at least every 15 minutes.	Document review.	A sample of weather data from onsite weather station.	The auditor observes that the on-site weather station data reviewed presents rainfall in inches rather than millimetres. Further the precision of the data displayed appears to be 1 inch, which may limit the ability to post process the data into mm.	C	C	-	-



Table 2 - Environmental Protection Licence 13426



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
196	M4.3	The groundwater monitoring network must be designed and installed in a manner that will achieve an equivalent environmental performance to that of Benchmark Technique 4 detailed in the EPA's Environmental Guidelines: Solid Waste Landfills (January 1996).	-	-	This condition was not triggered during the audit period	NT	NT	-	-
197	M4.4	The groundwater monitoring program must be designed and implemented in a manner that will achieve an equivalent performance to the of Benchmark Technique 5 detailed in the EPA's Environmental Guidelines: Solid Waste Landfills (January 1996).	-	-	The groundwater monitoring network was installed circa 2009, hence the condition is not triggered.	NT	NT	-	-
198	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.	Document review.	Genesis Complaints Register, provided by NSW EPA April 2017	The auditor has reviewed the Genesis Complaints Register, provided by the NSW EPA and available on the DADI website	C	C	-	-
199	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.	Document review.	Genesis Complaints Register, provided by NSW EPA April 2017	The auditor has reviewed the complaints register and is of the opinion that the register substantially captures the information required, noting that all required information is not always provided by agencies that capture and pass on the complaint details.	C	C	-	-
200	M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Document review.	Genesis Complaints Register, provided by NSW EPA April 2017	The complaint register contains complaints dating to project commencement.	C	C	-	-
201	M5.4	The record must be produced to any authorised officer of the EPA who asks to see them	Document review.	Available on the Genesis website.	While this condition is not believed to have been triggered during the audit period, the register is available on the DADI website in the event it is required by an EPA officer.	C	C	-	-
202	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.	Inspection. <i>(telephone complaints line)</i>	-	The auditor telephoned the complaint line to confirm it was a monitored telephone line.	C	C	-	-
203	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.	Document review.	Review of DADI Website	The complaints line was not advertised on the DADI website at the time of the audit as the auditee indicates the website had been the subject of recent technical issues. The auditee indicates that the complaints line had been advertised for the majority of the audit period (over 95%). The auditor is of the view that this condition may be viewed as substantially compliant.	C	C	-	-
204	M7.1	The proponent must provide an annual audit of the design, operation and odour management practices of the operation with the primary aim of identifying improvements that lead to attainment of best practice in regard to minimising odour emitted from the premises. The proponent must implement all reasonable audit recommendations. The scope of such an audit to be regularly reviewed in consultation with the EPA.	Document review.	KMH Odour Assessment dated 20 March 2017 and 2 May 2016	The auditee provided the auditor with a copy of a field odour report prepared by KMH Environmental and Stephenson Environmental Management Australia dated 20 March 2017. The report also includes discussion of the design, operation and odour management practices at the site. The report does not make any recommendations.  The 2016 odour assessment presents the results of a field ambient odour assessment. The 2016 assessment identifies odour emissions of 4-7 od on the boundary of the landfill void, which exceed the adopted Impact Assessment Criteria. It is noted that the field odour assessment does not consider the 'design, operation and odour management practices of the operation with the primary aim of identifying improvements' and hence cannot be considered an audit as such.  The scope of the odour assessments have not been reviewed in consultation with the EPA.	C	NC	LOW	Refer to recommendation from Audit Criteria #92
205	M7.2	The EPA may require the proponent to conduct assessments or investigations that identify the extent of any potentially offensive odour emissions beyond the boundary of the premises. The scope of such investigations to be agreed to by the EPA and may include revised air dispersion modelling based on actual site emissions data, well designed field investigations according to German standards, and/ or use of field olfactometers, and analysis of detailed complaints records and on-site meteorological data.	-	-	No such assessments or investigations are believed to have been requested during the audit period.	NT	NT	-	-
206	M7.3	Within one year after the Licence is varied to allow the disposal of waste at the Premises, the licensee must implement a landfill gas monitoring program designed to demonstrate whether landfill gas is migrating from the premises. This landfill gas monitoring program must meet the environmental goals detailed in Benchmark Technique 16 and 17 of the EPA Environmental Guidelines: Solid Waste Landfills (January 1996).	Document review.	Genesis Landfill Gas Monitoring Program (revised 27 February 2017)  'Former Quarry Site at Old Walgrove Road - Summary Of September 2016 Landfill Gas Monitoring Dial A Dump Industries', prepared by Pacific Environment 5 October 2016.	The report summarises results from landfill gas (LFG) monitoring at the Site undertaken on 23 September 2016 for subsurface gas and gas accumulation monitoring, and surface gas monitoring.	C	C	-	-



Table 2 - Environmental Protection Licence 13426



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
207	M7.4	The Licensee must monitor and record, weekly, the height of the leachate relative to the Australian Height Datum at EPA Points 26 and 27.	Document review.	Letter from Environ Consulting Services to Mr Rodney Johnson titled 'Management of Groundwater Interception System'	The referenced report presents the data collected during the period of 29th April 2016 to 3rd February 2017 for leachate monitoring well number EPA 27. The data collected by ECS during the aforementioned monitoring period shows that Genesis Landfill and Recycling Facility has been collecting leachate heights relative to AHD in monitoring EPA 27. The letter indicates data from EPA 26 has yet to be downloaded.	C	C	-	-
<b>6: Reporting Conditions</b>									
208	R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: a) a Statement of Compliance; and b) a Monitoring and Complaints Summary. 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.	Document review.	License No 13426 Annual Returns from 2015-16 and 2016-17	The two annual returns sighted contained a Statement of Compliance and a Monitoring and Complaints Summary.	C	C	-	-
209	R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	-	-		NOTED	NOTED	-	-
210	R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.	-	-	This condition was not triggered during the audit period	NT	NT	-	-
211	R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	-	-	This condition was not triggered during the audit period	NT	NT	-	-
212	R1.5	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	-	License No 13426 Annual Returns from 2015-16 and 2016-17	Review of correspondence attached to the annual review documents indicates the annual returns were submitted within the applicable period.	C	C	-	-
213	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.	-	License No 13426 Annual Returns from 2015-16 and 2016-17	The auditor sighted four years worth of historic EPLs.	C	C	-	-
214	R1.7	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	-	License No 13426 Annual Returns from 2015-16 and 2016-17	The EPLs have been signed by the company director.	C	C	-	-
215	R2.1	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.	Document review.	Genesis Incident Report Form and Register	Review of Genesis Incident Report Form and Register indicates material incidents were not reported for the audit period.	NT	NT	-	-
216	R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	-	-	Review of Genesis Incident Report Form and Register indicates material incidents were not reported for the audit period.	NT	NT	-	-
217	R2.3	If the results of surface water quality monitoring in the sediment pond(s) required by condition M2.2 indicate ammonia concentrations greater than 1mg/L the licensee must contact the EPA within 24 hours and advise of the results of that monitoring.	Document review.	Surface Water Quality Monitoring Records EPL 13246	Review of surface water quality monitoring data indicates no instances of elevated ammonia were identified.	NT	NT	-	-
218	R2.4	If leachate is discharged to surface waters from the premises the licensee must notify the event to the EPA in accordance with condition R3.1.	-	-	The auditee advised the auditor that no leachate was discharged to surface waters during the audit period.	NT	NT	-	-

## Table 2 - Environmental Protection Licence 13426

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Table 2 - Environmental Protection Licence 13426



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
229	E1.1	<p>Requirement to maintain financial assistance</p> <p>(a) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA prior to the issue of an environment protection licence allowing construction activities at the Premises. The financial assurance must be in favour of the EPA in the amount of two hundred thousand dollars (\$200,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.</p> <p>(b) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA prior to the Licence being varied to allow the receipt of waste at the Premises. The financial assurance must be in favour of the EPA for a total amount to be held by the EPA of four hundred thousand dollars (\$400,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. Note that this total financial assurance is inclusive of that required in E1.1(a)</p> <p>(c) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA one calendar year after the EPA varies the Licence to allow the receipt of waste at the Premises. The financial assurance must be in favour of the EPA for a total amount to be held by the EPA of eight hundred thousand dollars ( \$800,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.</p> <p>Note that this total financial assurance is inclusive of that required in E1.1a) and E1.1b).</p> <p>(d) The licensee must provide to the EPA, along with the original counterpart guarantee, confirmation in writing that the financial institution providing the guarantee is subject to supervision by the Australian Prudential Regulatory Authority (APRA).</p>	Document review	Bankers Undertaking (15 May 2012)	A copy of a bankers undertaking date 15 May 2012 was sighted by the auditor.	C	C	-	-
230	E1.2	An adjustment to the financial assurance must be calculated, each licence review period, in line with the Consumer Price Index for the number of years since the financial assurance was last paid. The financial assurance must be replenished to the full amount plus CPI adjustments each licence review period.	-	-	No licence reviews have been undertaken in the audit period.	NT	NT	-	-
231	E1.3	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.	-	-	-	NT	NT	-	-
232	E1.4	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.	-	-	-	NT	NT	-	-
233	E1.5	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	-	-	-	NT	NT	-	-
234	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, or b) the adjusted financial assurance as required by condition E1.2 and E1.3	-	-	-	NT	NT	-	-
235	E2.1	Claims on financial assurance 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.	-	-	-	NOTED	NOTED	-	-
236	E3.1	<p>While the licensee's premises are being used for the purpose to which the licence relates, the licensee must:</p> <p>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.</p> <p>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.</p> <p>c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.</p>	Document review. Visual inspection Staff interviews	Incident register for the site.	<p>The auditor did note observe any staining or evidence of spills during the audit site visit.</p> <p>The auditor interviewed the driver of a mobile plant refuelling tanker and the driver indicated he was not aware of the procedure for the clean up of spills.</p> <p>It is unclear from the incident register provided by the licensee, how many environmental incidents have occurred during the audit period and the nature of these incidents.</p>	C	OBS	-	Refer to the recommendation for audit criteria 121.
237	E3.2	<p>In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must:</p> <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>	Document review	<p>Site Surface Water Management Plan (Storm Consulting, November 2008)</p> <p>Pollution Incident Response Management Plan MPC (DADI, JUNE 2016)</p>	<p>The auditor notes that the licensee has procedures in place to manage pollution events in the event of adverse weather conditions. These are largely contained within the PIRP.</p> <p>The nature of the landfilling operation is such that there is little likelihood of surface water or leachate leaving the confinement of the pit in event of a rain or flood event. Groundwater dynamics are similarly not expected to be altered by such an event, provided leachate is promptly removed from the pit.</p>	C	C	-	-
238	E3.3	<p>After the licensee's premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must:</p> <p>a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; and</p> <p>b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination.</p>	-	-	-	NT	NT	-	-

Table 2 - Environmental Protection Licence 13426



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
239	E4	In accordance with condition O5.4 the Licensee may apply material as an alternative daily cover that meets the following criteria: [refer to page 28 of the EPL]	Document review	Letter from Environ Consulting to Mr Rodney Johnson of DADI titled ConCover Trial Report dated 24 March 2016	The auditor has reviewed a report summarising the results of a trial of an alternative daily cover material "ConCover". The review indicates the alternative material meetings the requirements of the EPL.	C	C	-	-
240	E5.1	Prior to the waste in the cell reaching the equivalent level of 30mAHD the six Stage 2 (two intermediate and four shallow) groundwater monitoring bores detailed in the report titled "Groundwater Monitoring Plan: Genesis Facility, Eastern Creek" dated March 2012 and prepared by IGGC ("the Report") and located approximately in accordance with 'Figure 3: Bore Locations (approximate)' contained within the Report must be installed. The bores must be installed and constructed in accordance with the Report and/or any new hydrological data.	-	-	This trigger height is not believed to have been reached.	NT	NT	-	-
241	E5.2	Prior to installation of the groundwater monitoring bores the EPA must be notified so conditions requiring the installation and monitoring of the groundwater bores can be added to the Licence.	-	-	This trigger height is not believed to have been reached.	NT	NT	-	-
242	E5.3	No waste may be disposed of in the cell once it reaches the equivalent level of 30 mAHD until the groundwater monitoring bores detailed in Condition E5.1 are installed to the satisfaction of the EPA, and the EPA provides approval in writing.	-	-	This trigger height is not believed to have been reached.	NT	NT	-	-
243	E6.1	The licensee may conduct a trial using the alternative daily cover ConCover for a twelve (12) month period. The alternative daily cover operational trial: a) shall commence from the first day alternative daily cover is utilised at the premises; b) may use polymer and fibre based product specifically developed to cover waste at the premises as specified in the report titled 'Genesis Landfill Facility - Assessment and Justification for a trial use of Concover' dated 19 December 2012 and prepared by Genesis; c) be undertaken in accordance with the report titled 'Genesis Landfill Facility - Assessment and Justification for a trial use of Concover' dated 19 December 2012 and prepared by Genesis; d) the trial does not include intermediate cover; and e) in accordance with clause 42 of the Protection of the Environment Waste Regulation, the trial does not permit use of concover on asbestos waste	Document review	Letter from Environ Consulting to Mr Rodney Johnson of DADI titled ConCover Trial Report dated 24 March 2016	The auditor has reviewed a report summarising the results of a trial of an alternative daily cover material "ConCover". The review indicates the alternative material meetings the requirements of the EPL.	C	C	-	-
244	E6.2	The licensee must provide a written report to Manager Waste Operations, Environment Protection Authority PO Box A290 Sydney South NSW 1232, within 30 days of the end of the alternative daily cover operational trial. The report must include, but not limited to: a) a qualitative assessment of the effectiveness of the alternative daily cover in meeting the objectives of Benchmark Techniques 33 of the EPA's Environmental Guidelines: Solid Waste Landfills (1996); and b) a qualitative assessment of the in-field practical effectiveness of using alternative daily cover.	Document review	Letter from Environ Consulting to Mr Rodney Johnson of DADI titled ConCover Trial Report dated 24 March 2016	The auditor has reviewed a report summarising the results of a trial of an alternative daily cover material "ConCover". The dates of the trial are not provided in the report however the auditee indicates the trial and notification period do not fall within the audit timeframe.	NT	NT	-	-
245	E7.1	A. The Licensee must submit the following information to the EPA by 31 December 2013: A structural Pipe Loading Analysis Report	Document review	Structural Pipe Loading Analysis Report (Cardno, December 2013)	The auditor understands that there has been correspondence with the EPA on this matter however not within the audit period.	NT	NT	-	-
246	E7.1	B. The Licensee must submit the following information to the EPA by 31 January 2014: An Odour Impact Assessment, undertaken by a suitably qualified expert in accordance with Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (DEC, 2005), that includes: i. An analysis of current odour emissions from the landfill and identification of potential odour sources at the premises based on current operations; ii. An analysis of the odour potential of leachate accumulated to a depth of 20m within the landfill, including analysis and characterisation of the leachate from odorous compounds; and iii. Predicted off-site odour emissions caused by 20m of accumulated leachate in the landfill.	-	-	The trigger date falls outside of the audit timeframe.	NT	NT	-	-
247	E7.2	The Licensee must provide to the EPA by 17 December 2013 design specifications for a leachate monitoring well within Lot 1 DP 1145808 that will be designed to be functional for the life of the landfill that includes; i. Material specifications; ii. Structural calculations; iii. Cross sectional drawings; iv. Schedule for construction; and v. Location plan.	-	-	The trigger date falls outside of the audit timeframe.	NT	NT	-	-

Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
<div>Compliance Assessment Criteria:</div> <div>C - Compliant</div> <div>NC - Non-Compliant</div> <div>ANC - Administrative non-compliance</div> <div>NV - Not Verified</div> <div>NT - Not Triggered</div> <div>OBS - Observation</div> <div>NOTED</div>									
Schedule 2: Administrative Conditions									
248	06_0139-2,1	The Proponent 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 project.	Review of overall audit findings.	A range of documents were reviewed in the course of this audit, which contributed to the overall assessment of environmental performance.	On balance, the auditor believes the project has implemented a range of measures that may be expected to prevent and/or minimise any harm to the environment (within the bounds of feasibility and reasonableness).  Opportunities for improvement have been identified and these are discussed in the respective sections of this report.	C	C	-	-
249	06_0139-2,2	The Proponent shall carry out the project generally in accordance with the: a) EA; b) Statement of Commitments; c) site plan and building elevation drawings at Appendix 1 and Appendix 6; d) Modification application 06_0139 Mod 1 with supporting document titled Light Horse Business Centre, Environmental Assessment Report: Project Modification prepared by Light Horse Business Centre, dated August 2010 and Additional Information, dated 6.9.2010 and 13.9.2010; e) Modification application 06_0139 Mod 2 dated 9.11.10; f) Modification application 06_0139 Mod 3 dated 10 May 2011 with supporting document titled Light Horse Business Centre, Environmental Assessment Report: Modification 3, September 2011 prepared by Light Horse Business Centre (which contains 'LandPartners' operational landform plan, 'Martens' report for stormwater management, and building elevations); g) Modification Application 06_0139 Mod 4 with supporting document titled the document titled S75W Modification 4, dated October 2013 and prepared by Urbis Pty Ltd; and h) Modification Application MP 06_0139 Mod 5 and supporting documents titled Section 75W Report, Modification 5, dated 18 March 2015, prepared by Urbis Pty Ltd; Response to Submissions, dated 19 May 2015, prepared by Urbis Pty Ltd; and Spoil Management Plan, dated September 2015, prepared by Genesis Xero Waste.	Review of overall audit findings.	A range of documents were reviewed in the course of this audit, which contributed to the overall assessment of environmental compliance.	The auditor is of the opinion that the project has demonstrated an overall compliance rate of 75% compliance with regulatory obligations during the audit period.	C	C	-	-
250	06_0139-2(a)	The construction of the buildings referred to in condition 8(a - c) are not approved, only the use of the buildings.	-	-	-	NOTED	NOTED	-	-
251	06_0139-2,3	If there is any inconsistency between the above, the conditions of this approval shall prevail to the extent of any inconsistency	-	-	-	NOTED	NOTED	-	-
252	06_0139-2,4	The Proponent shall comply with any reasonable requirement/s of the Director General arising from the Departments assessment of: a) any reports, plans, strategies, programs or correspondence that are submitted din accordance with this approval; and b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence	Interview with site representative.	-	The auditee indicates extensive consultation has been undertaken with the DP&E in regards to the precinct road and financial contributions. The auditor understands the proponent is proceeding with relevant planning and financial contributions for this project.	C	C	-	-
253	06_0139-2,5	The Proponent shall not receive more than 2 million tonnes of materials at the site per calendar year.	Document review.	Volumetric surveys from 2015 - 2017.	Review of volumetric surveys for June and December 2016 indicates198,066t and 223,954t of waste were received respectively, or a total of 422,020t for the 2016 calendar year.	C	C	-	-
254	06_0139-2,6	Nothing in this approval gives affect to or approves those works being undertaken, structures or buildings, on the site, in the area currently leased to Hanson (see Figure 1.2 in the EA).	-	-	-	NOTED	NOTED	-	-
255	06_0139-2,7	In the event that a dispute arises between the Proponent and Council or a public authority, other than the Department, in relation to the reasonableness of any requirements proposed by Council or a public authority arising from the conditions of this approval, the matter can be referred by either party to the Director-General for resolution. Note: If the dispute cannot be resolved in 28 days, the Director-General will refer the matter to an Independent Dispute Resolution Process (see Appendix 5).	-	-	-	NOTED	NOTED	-	-
256	06_0139-2,8	Prior to the commencement of operations the Proponent shall obtain and provide copies of all necessary building certificate(s) from Council to the Director-General, for the following works: a) The weighbridge and associated infrastructure. B) the amenities building adjacent to the MPC c) the new administration/office building adjacent to the car park area	-	-	This requirement does not fall within the audit period.	NT	NT	-	-

Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
257	06_0139-2,9	The Proponent shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structure are constructed in accordance with the relevant requirements of the BCA. Notes: • Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the project.	-	-	No new buildings or alterations were constructed / made during the audit period.	NT	NT	-	-
258	06_0139-2,9(a)	Construction works associated with the weighing silos, and conveyor and cute system shall be: a) the subject of appropriate b) in accordance with the relevant Australian Standards	-	-	No new buildings or alterations were constructed / made during the audit period.	NT	NT	-	-
259	06_0139-2,9(b)	No temporary structures such as demountable sheds or shipping containers are to be used as a substitute for any approved permanent structure. This does not prevent the use of demountable structures on site during construction.	-	-	It is noted that the current office buildings are demountable buildings however the auditor has been advised that the DP&E has approved the use of these buildings in the event currently outstanding modification 7 is approved.	NT	NT	-	-
260	06_0139-2,10	The Proponent shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.	-	-	No demolition occurred during the audit period.	NT	NT	-	-
261	06_0139-2,11	Prior to the construction of any utility works, the Proponent shall obtain the relevant approvals from service providers and Council, including, but not limited to a Section 73 Compliance Certificate from Sydney Water	-	-	No new utility works were undertaken during the audit period	NT	NT	-	-
262	06_0139-2,12	The Proponent shall: a) prepare a dilapidation report of the public infrastructure in the vicinity of the site (including roads, gutters, footpaths), in consultation with Council, and submit a copy of this report to the Department prior to the commencement of construction; b) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the project; and c) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the project.	-	Staff training records (Asbestos awareness workshop - 27 Apr 2017) and general skills and training matrix  A sample of the operators tickets to operate mobile plant.  EHS Procedures and Instructions including SWMS for operation of a range of mobile plant.	Construction phase condition	NT	NT	-	-
263	06_0139-2,13	The Proponent shall ensure that all plant and equipment used on the site is: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	Document review Visual inspection	Mobile and fixed plant (MPC) maintenance records  Sample of EHS Work Instructions  Sample of staff training records  Staff skills and training matrix  A sample of the operators tickets to operate mobile plant.  EHS Procedures and Instructions including SWMS for operation of a range of mobile plant.	The auditor has reviewed a sample of maintenance records for mobile and fixed plant at the site as well as training records and qualifications for a sample of machinery operators. The auditor is satisfied plant and equipment used on the site is: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	C	C	-	-
264	06_0139-2,14	With the approval of the Director-General, the Proponent may submit to the Director-General for approval any plan, strategy, study, or program required by this consent on a progressive basis.	-	-	-	NOTED	NOTED	-	-
266	06_0139-2,15	Where this approval requires the Proponent to prepare a plan, strategy, study or program in consultation with a specified agency, the Proponent shall a) provide a draft of this plan, strategy, study, or program to the relevant agency for comment/endorsement; and b) amend the draft to take account of the comments provided by the agency, if any.	Document review. Interview with site representatives	The Rehabilitation and Closure Plan	The auditee indicates a Rehabilitation and Closure Plan was prepared and submitted to the DP&E during the audit period. Additionally a number of management plans were revised and submitted to the DP&E for review.	C	C	-	-
267	06_0139-2,16	Where this approval requires the Proponent to prepare a plan, strategy, study or program to the agency for approval, the Proponent is required to obtain written approval from the agency.	Document review. Interview with site representatives	The Rehabilitation and Closure Plan	The auditee indicates a Rehabilitation and Closure Plan was prepared and submitted to the DP&E during the audit period. Additionally a number of management plans were revised and submitted to the DP&E for review.	C	C	-	-
Schedule 3: Specific Environmental Conditions									
268	06_0139-3,1	The Proponent shall not: a) landfill more than 700,000 tonnes of non-putrescible waste per calendar year; b) receive or landfill putrescible waste on site; c) stockpile more than 50 tonnes of tyres on site at any one time; d) stockpile more than 20,000 tonnes of green waste on site at any one time. e) receive waste on site that is contaminated by chemicals and/ or pathogens that will not be rendered harmless by the process or that may constitute a health or environmental risk, including clinical and related waste and diseased carcasses; and f) receive waste on site containing contaminants classified as hazardous waste, restricted waste (other than asbestos) or liquid waste under the POEO Act.	Document review.	Volumetric surveys from 2015, 2016, 2017.  Spotters Training Manual  Incoming product testing register  DADI rejected loads register	Review of volumetric survey data suggests the site is compliant with the numeric limits specified by this condition. Review of other documentary evidence suggests the site has procedures in place to identify and reject un-approved waste.	C	C	-	-

Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
269	06_0139-3,2a	Implement suitable procedures to: · ensure that the site does not accept wastes that are prohibited; and · screen incoming waste loads.	Document review.	Visual Inspection  Genesis Spotters Training Manual  Incoming product testing register  DADI rejected loads register	The auditor has reviewed the procedures used on site to identify and reject / divert prohibited wastes. In general the procedures are considered robust and generally adequate. In particular the recent implementation of an asbestos detection instrument is expected to increase the efficacy of the procedure.  Nevertheless the identification of asbestos or other contaminants within waste streams such as soil, brick, concrete etc is inherently problematic and recent site experience (refer to audit criteria 459) has shown that at times, asbestos waste does pass through the screening processes undetected.  The auditor understands a new screening tool has been recently implemented on the site to detect asbestos. This should reduce the likelihood of asbestos being inadvertently received at the site.	C	C	-	-
270	06_0139-3,2(b)	Install suitable signs at the entry to the site, indicating the types of waste that are permitted to be accepted and those wastes that are prohibited.	Visual inspection.	Visual inspection	The site entry sign displays a list of wastes accepted and waste types that are not accepted.	C	C	-	-
271	06_0139-2,2(c )	Ensure that: · all waste sludges and wastes that are controlled under a tracking system have all the appropriate documentation prior to acceptance at the site; · staff receive adequate training in order to be able to recognise and handle hazardous or other unapproved wastes; and · Procedures and training requirements are integrated into the Environmental Management Strategy for the Project (See schedule 5 condition 1).	Document review.	Genesis Spotters Training Manual  EHS System Procedure - Hazardous Substance  Hazard identification and risk assessment  Training Records - Asbestos Awareness - Nathan Shaw  Training Records - Spotters Training Register  A sample of incoming loads of waste and accompanying waste classification reports.	The auditor has reviewed the waste acceptance and tracking system for the site. In summary each load is assigned a job number for tracking purposes. Waste classification certificates are provided for bulk granular materials accepted at the site.  The auditor understands staff are trained in the identification and management of hazardous waste. The procedures and training are components of the ESM for the project.  Review of waste classification reports for the 30/5/17 (a randomly selected day of operation) indicates waste had been appropriately classified within these reports.	C	C	-	-
272	06_0139-3,3	The Proponent shall: a) implement procedures to identify and handle asbestos waste. These procedures should be in accordance with National Occupational Health and Commission (Safe Work Australia's) Code of Practice & Guidance Notes for the Management & Control of Asbestos in WorkPlaces, relative guidelines and legislation from WorkCover NSW and the POEO Regulation; and b) integrate these procedures into the Environmental Management Strategy for the Project	Document review.	Training Records - Asbestos Awareness  Training Records - Spotters Training Register  Asbestos Management Plan (DADI, March 2017)  EMS Waste Monitoring Program (November, 2015)  SWMS - Disposal of Asbestos Soil in Landfill  SWMS - Disposal of Wrapped Asbestos in Landfill  Rejected Loads Register and Reject Load Certificate  Employee site inductions  'Management of Asbestos in recycled Construction and Demolition Waste'	The auditor has reviewed a range of documentary evidence in relation to the identification and management of asbestos, and has viewed the incoming waste identification procedures at the site. The auditor cannot verify the compliance of such procedures with any particular health based guideline.	C	C	-	-
273	06_0139-3,3(a)	The Proponent shall ensure that at no time is asbestos waste (as defined in the POEO Act) permitted to be placed in the conveyor/chute system for conveyance to the base of the landfill.	Document review. Visual inspection.	Dial a Dump Industries EMS Conveyor and Chute Waste Handling Procedures (June 2011)  Asbestos Management Plan (DADI, February 2014)	The operation implements a number of procedures to identify asbestos within incoming loads. Loads containing asbestos are deposited within designated skip bins or taken directly into the landfill void for disposal. The auditor understands the operation utilises an asbestos identification gun to screen potentially asbestos containing materials whereupon they can be transported into the pit by truck. On the balance of probabilities the auditor is of the opinion that it is unlikely asbestos is transported into the landfill void using the chute system.	C	C	-	-



Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
274	06_0139-3,4	Except for the following, the Proponent shall dispose of all outputs produced from the waste processing and/or resource recovery facility on site to the landfill: a) Recyclables extracted and delivered off-site for resource recovery purposes; b) Putrescible waste extracted from the input waste stream and lawfully disposed of off-site; c) Restricted waste and hazardous waste extracted from the input waste stream and lawfully disposed of off-site; and d) Output waste derived materials approved for use under the Protection of the Environment Operations Act, 1997 and Regulation.	Document review.	Various Volumetric surveys of landfill for license No. 13426 dated 2013 - 2015 with photograph displaying numbered stockpiles  Waste Contribution Monthly Report December 2014, January 2014, September 2013	The auditor notes that the NSW EPA issued Show Cause Letter 1546716 to DADI in relation to 'Exhuming of Waste'.  The auditor is satisfied that while the waste was transported into the landfill void via the chute, it had yet to be landfilled (either compacted or buried) and as such exhumation is not believed to have occurred.  The auditee advised the auditor that the materials in question were being sent to an alternative facility for further processing. This facility is understood to be the 'Greenspot' landfill and recycling facility. The auditor has been unable to verify whether the material was indeed subject to resource recovery or whether it was landfilled at the greenspot facility.	C	NV	-	Refer to Audit Criteria #143
275	06_0139-3,5	Within 12 months of the commencement of operations, the Proponent shall prepare and implement a Waste Monitoring Program for the Project. This Program must: a) be prepared in consultation with DECCW; b) be prepared to the satisfaction of the Director-General; and c) include a suitable program to monitor the: · quantity, type and source of waste received on site; and · quantity, type and quality of the outputs produced by the site.	Document review.	Dial a Dump Industries EMS Waste Monitoring Program November 2016	The auditor has reviewed the Waste Monitoring Program. It appears the Program is broadly compliant with this audit criteria however it is noted that explicit approval of the program by the DP&E has not been confirmed.  Review of correspondence between the DP&E and DADI indicates the EMS (2011) was approved by the department. The auditee indicates that subsequent versions of management plans have been submitted to the DP&E for review however they have not received a response.	C	C	-	-
276	06_0139-3,6	Prior to the commencement of operations, the Proponent shall install a floor and wall landfill liner within the former quarry void (below the weathered zone) unless otherwise agreed to by the Director-General. The specifications of the landfill liner shall be developed in consultation with DECC and submitted to the Director-General for approval prior to construction commencing.	-	-	Not triggered during the audit period	NT	NT	-	-
277	06_0139-3,7	Prior to the commencement of operations the Proponent shall implement all slope stabilisation and risk control measures detailed in the 'Geotechnical Quarry Slope Stability Assessment' report prepared by Jeffery and Katauskas Pty Ltd dated 17 March 2008. The results from any survey monitoring or inclinometers installed at the north face landslip area should be included in the Annual Environmental Review requirements outlined in Schedule 5 condition 3.	-	-	Not triggered during the audit period	NT	NT	-	-
278	06_0139-3,8	The Proponent shall prepare and implement a Landfill Plan for the Project to manage the disposal of material into the void to ensure a suitable level of compaction occurs. The Plan must: a) be to the satisfaction of the Director-General; b) be submitted within 12 months of commencing operations; c) be submitted every 3 years during the life of the operation (coinciding with the independent environmental audit required at Schedule 4, condition 4); and d) be submitted 12 months prior to the closure of the landfill; e) be conducted by a suitably qualified, experienced, and independent engineer (or other relevant expert) whose appointment has been endorsed by the Director-General; f) detail the proposed disposal methodology to achieve a suitable level of compaction; g) include a criteria or level of compaction target for the landfill, with the view to types of uses post-land filling of the void; h) outline a process to monitor the performance of the disposal methodology, compaction and settling rates; and i) contingency measures should the rates not be achieved; and j) procedures for reporting the components of this Plan.	Document review.	Genesis Waste Facility Filling Plan dated 2 May 2016 and revised 2 May 2017  Letter from the DP&E to DADI dated 23rd December 2011	The auditor has sighted two landfill filling plans which are understood to have been submitted in the required timeframe. Review of correspondence between the DP&E and DADI indicates the EMS (2011) was approved by the department. The auditee indicates that subsequent versions of management plans have been submitted to the DP&E for review however they have not received a response.	C	C	-	-
279	06_0139-3,9	The Proponent shall: a) minimise the exposed or cleared areas at the landfill; b) fill the landfill cell in a systematic manner in accordance with the Landfill Plan in Schedule 3 condition 8, that maximises compaction rates; c) cover all exposed landfilled waste with at least 150mm of VENM (or a suitable alternative) at the end of daily waste disposal and compaction activities or with intermediate cover comprising at least a 300mm thick layer of VENM if the resultant covered surface is to be left exposed for more than 90 days.	Visual inspection. <note daily and intermediate cover is assessed elsewhere>  Document review	Genesis Waste Facility Filling Plan dated 2 May 2016 and revised 2 May 2017  ConCover Trial Report (Environ, 2016)	The auditor has reviewed the land filling plan and notes that the plan does not identify specific cells or areas for filling - it is largely around placement of the dam.  Discussions with the auditee indicates the site operator periodically applies and compacts intermediate cover to ensure overall landfill compaction is satisfactory. A polymer substance (Concover) is used for daily cover. Review of the ConCover trial report suggests this product is a suitable alternative to daily soil cover.	C	C	-	-



Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations	
280	06_0139-3,10	Leachate Management System: 10. Prior to the commencement of construction of the leachate management system, the Proponent must submit a report to the Director- General for approval that is prepared in consultation with DECCW and Sydney Water, providing design details of the proposed leachate collection, conveyance, extraction, storage, treatment and disposal systems for all aspects of the proposal's operations (landfill and materials processing centre / resource recovery facility), including but not limited to: a) a construction quality assurance (CQA) plan for the collection, conveyance and storage measures of leachate including details of the leachate barrier system proposed for any surface areas used for the direct impoundment of leachate; b) details of the proposed leachate pre-treatment system, including its capacity; c) a program for the installation and commissioning of the systems; and d) details of the Proponent's proposed trade waste agreement with Sydney Water Corporation.	-	-	Not triggered during the audit period	NT	NT	-	-	
281	06_0139-3,11	11. No waste may be received until the Proponent has constructed the proposed leachate collection system and the leachate treatment plant and has secured a trade waste agreement with Sydney Water Corporation for the disposal of treated leachate.	-	-	Not triggered during the audit period	NT	NT	-	-	
282	06_0139-3,12	Windrow Management 12. The Proponent shall manage windrow composting operations in accordance with: a) AS 4454-2003: Composts, Soil Conditioners and Mulches, Appendix N; b) Best practice guidelines for Composting Systems; c) the most protective level of measures set out in the Environmental Guidelines for Composting & Related Organics Processing Facilities; or d) other practices approved by the DECCW/EPA.	-	-	No composting has been undertaken at the site during the audit period.	NT	NT	-	-	
283	06_0139-3,13	The Proponent shall: a) Implement suitable measures to prevent the unnecessary proliferation of litter both on and off site; and b) Inspect and clear the site and surrounding area, of litter on a daily basis.	Document review. inspection.	Visual	WBI inspection (internal routine inspection records)	The auditor did not observe evidence of litter proliferation on the site. Review of inspection records indicates measures are implemented to identify and rectify litter issues.	C	C	-	-
284	06_0139-3,14	The Proponent shall: a) Implement suitable measures to manage pests, vermin, feral animals and declared noxious weeds on site and identify those measures in the Environmental Management Strategy for the Project (See Schedule 5 condition 1) b) Inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin, feral animals or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area; and c) Perform ongoing monitoring of weed infestation on and adjoining the site.	Visual inspection review	Document	Pests, Vermin Feral Animals and Declared Noxious Weeds Management Plan, Revised 16 March 2017  Dial a Dump Industries Eastern Creek Bushland Restoration Works Program 2017 Financial Year (Earth Repair and Restoration)  Weed Management Reporting (record of weed control activities) dated: - February 2017 - June 2016 - September 2016 - November 2016  Tax Invoices for vermin control (four invoices - Rentokil)	The auditor is of the opinion that appropriate measures to manage some pests and declared noxious weeds are being implemented on the site. In particular extensive weed control has been undertaken by a contractor during the audit period.  While basic checks for the presence of weeds and vermin is included on the weekly site inspections this does not demonstrate adequately the control activities are effective nor does it constitute a formal weed monitoring program. Indeed the auditor sighted extensive evidence of fox activity on the site during the site inspection and notes that this was an issue identified during previous audits. The current checks do not therefore appear to be effective in quantifying the issue and informing management responses.	C	NC	LOW	Refer to Audit Criteria #43
285	06_0139-3,15	The Proponent shall: a) prevent unauthorised entry to the site; and b) install and maintain a perimeter stock fence and lockable security gates on site.	Document review. inspection of fencing.	Visual	LHBC EMS Fencing and Security Plan (2016)  Security contractor invoices.	The auditor notes that perimeter fencing was observed on the site along with lockable gates on entry to the premises. A security system including alarms and CCTV is in operation.	C	C	-	-
286	06_0139-3,16	The Proponent shall: a) Prepare an Emergency & Fire Response Plan for the site to the satisfaction of NSW Fire Brigade, which should include but not be limited to mitigation measures, and include the number of days material can be stored on site, prior to construction commencing and the plan being implemented; b) implement suitable measures to minimise the risk of fire on site; c) extinguish any fires on site promptly; d) maintain adequate fire-fighting capacity on site; and e) detail emergency evacuation procedures	Document review.		Emergency Evacuation Manual (First Five Minutes, 16th March 2016)	The auditor has reviewed the Emergency & Fire Response Plan for the site and notes that the plan includes measures: b) to minimise the risk of fire on site; c) extinguish any fires on site promptly; d) maintain adequate fire-fighting capacity on site; e) detail emergency evacuation procedures  The auditee has been unable to provide evidence to suggest this Plan has been endorsed by the NSW Fire Brigade	C	NC	LOW	Ensure the Emergency & Fire Response Plan is endorsed by the NSW Fire Brigade.

Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
287	06_0139-3,16(a)	The Proponent shall prepare detailed design plans for the conveyor/chute system. These plans shall: a) be prepared by a suitably qualified engineer in consultation with the DECCW; b) be submitted to the Director-General for approval prior to the commencement of construction; c) include the dimensions and gradients of the conveyor and chute; d) include a fully enclosed conveyor/chute system; e) include a waste drop height of no more than 3 metres between the end of the sock and the base of the quarry; f) incorporate fine mist sprays at the discharge end of the chute to minimise dust; and g) incorporate maintenance access points.	-	-	Chute design plans were prepared and submitted to the DP&E prior to the commencement of landfilling activities at the site. As such this condition does not fall within the audit period.	NT	NT	-	-
288	06_0139-3,16(b)	The Proponent shall prepare a Conveyor and Chute System Maintenance and Management Plan. The Plan shall: a) be submitted to the Director-General for approval prior to the commencement of operation; b) include a maintenance schedule; c) detail contingency measures in the event that the system breaks down, or is not coping with the intended quantities of waste; and d) detail contingency measures to remove asbestos waste from the system should it be detected.	-	-	The chute maintenance management plan was prepared and submitted to the DP&E prior to the commencement of landfilling activities at the site. As such this condition does not fall within the audit period.	NT	NT	-	-
289	06_0139-3,17	SOIL, WATER AND LEACHATE MANAGEMENT Discharge Limits 17. Except as may be expressly provided in an EPL for the project, the Proponent shall comply with Section 120 of the POEO Act.	-	-	-	NOTED	NOTED	-	-
290	06_0139-3,18	Except as may be expressly provided in an EPL for the project, the Proponent shall discharge wastewater, including treated wastewater, to sewer, in accordance with a Trade Waste Agreement with Sydney Water.	Document review.	Consent No. 1-BSTVHV to Discharge Industrial Waste	The auditor has sighted the site's Trade Waste Agreement with Sydney Water	C	C	-	-
291	06_0139-3,19	19. The Proponent shall design and construct the sewer to the satisfaction of the Director-General, to a sufficient size and depth, so as to not preclude the orderly development of Lots 9 and 11 in DP241859, or the construction of the Precinct Plan Road that will eventually traverse Lot 10 DP241859.	-	-	Not triggered during the audit period	NT	NT	-	-
292	06_0139-3,20	The Proponent shall store all chemicals, fuels and oils used on site in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. These bunds shall be designed and installed in accordance with the requirements of all relevant Australian Standards, and/or DECCW's Storing and Handling Liquids; Environmental Protection manual.	Visual inspection.	-	Three drums containing hydrocarbons and two lead acid batteries were observed to be stored on a self bunded pallet near the entrance to the MPC. Whilst the capacity of the sump exceeded the volume of the largest container + 10% the integrity of the bund had been compromised as it had been punctured by a forklift.  The auditor was advised that no bulk chemicals or hydrocarbons are stored on the site.	C	NC	LOW	Ensure all chemicals, fuels and oils used on site in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container.
293	06_0139-3,21	The Proponent shall prepare and implement a Soil, Water and Leachate Management Plan for the site to the satisfaction of the Director-General. Must include; site water balance, erosion and sediment control plan, stormwater management scheme, a surface water, groundwater and leachate monitoring program and a surface water groundwater and leachate response plan.	Document review.	EMS Soil, Water and Leachate Management Plan (March 2017)	The auditor has reviewed the EMS Soil, Water and Leachate Management Plan. The plan contains a water balance, an Erosion and Sediment Control Plan, a stormwater management scheme, a surface water, groundwater and leachate monitoring program and a surface water groundwater and leachate response plan.	C	C	-	-
294	06_0139-3,22	The site water balance must: a) include details of all water extracted, transferred, used and/or discharged by the development; b) identify the source of all water collected or stored on the site, including rainfall, stormwater and groundwater; c) describe the measures that would be implemented to minimise water use on site.	Document review.	Soil, Water and Leachate Management Plan (March 2017)	Within SWLMP	C	C	-	-
295	06_0139-3,23	The erosion and sediment control plan must: a) be consistent with the requirements in the latest version of Managing Urban Stormwater: Soils and Construction (Landcom); b) identify the activities on site that could cause soil erosion and generate sediment; and c) describe what measures would be implemented to: · minimise soil erosion and the transport of sediment to downstream waters, including the location, function and capacity of any erosion and sediment control structures; and · maintain these structures over time.	Document review.	Soil, Water and Leachate Management Plan (March 2017)	Within SWLMP	C	C	-	-

Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
296	06_0139-3,24	The stormwater management scheme must: a) be consistent with the guidance in the latest version of Managing Urban Stormwater: Council Handbook (DEC); and b) include the detailed plans for the proposed surface water management system.	-	-	Construction phase condition	NT	NT	-	-
297	06_0139-3,25,a	25. a) A site stormwater management system shall be provided for the Total Operational Area prior to the final landform being established or filled to the lowest point of the rim of the quarry void area, whichever occurs sooner. The system shall be designed to attenuate post development flows to a maximum of the predevelopment flows over the range of storms from the critical 2 year ARI event up to and including the critical 100 year ARI event under all stages of development including final landform for each of the four catchments shown in the Precinct Plan (Quarry, Quarry North, Upper Angus Creek and Ropes Creek Tributary catchments). The site stormwater management system shall also comply with the stormwater quality management and Water Sensitive Urban Design (WSUD) criteria in the Precinct Plan.	-	-	Not triggered during the audit period	NT	NT	-	-
298	06_0139-3,25,b	b) For the purpose of calculating predevelopment flows, the predevelopment (rural) discharge rates are calculated from the catchment delineation shown in the Precinct Plan. The predevelopment catchment area for the Total Operational Area are summarised in Table 1below.	-	-	Not triggered during the audit period	NT	NT	-	-
299	06_0139-3,25,c	c) The predevelopment catchment flows for the Total Operational Area are calculated to be consistent with Council's proposed Precinct Plan stormwater infrastructure calculations. The predevelopment catchment flows are to be determined using the predevelopment catchment parameters listed in Table 1 below for use in the XP-RAFTS hydrologic software, Council will provide the predevelopment discharges for the Total Operational Area.	-	-	Not triggered during the audit period	NT	NT	-	-
300	06_0139-3,25,d	d) The design rainfall data used in the hydrologic calculations must be in accordance with Council's current Engineering Guide for Development.	-	-	Not triggered during the audit period	NT	NT	-	-
301	06_0139-3,25,e	e) The catchment parameters utilised in the design shall be in accordance with the Council's current Engineering Guide for Development and represents the actual developed catchment conditions including size, slope, impervious and pervious areas, time of concentration (if appropriate) and flow travel times.	-	-	Not triggered during the audit period	NT	NT	-	-
302	06_0139-3,25,f	f) The design of the site stormwater management system shall be consistent with the proposed Precinct Plan road system and downstream stormwater systems. Details of how the system will connect to and discharge into the downstream systems are to be provided with the detailed design of the system.	-	-	Not triggered during the audit period. It is noted that the Precinct Road design is yet to commence.	NT	NT	-	-
303	06_0139-3,25,g	g) The design of the site stormwater management system shall incorporate a contingency to meet a sensitive analysis of the system in relation to climate change in accordance with best practice at the time the design in prepared.	Document review.	Site Surface Water Management Plan (Storm Consulting, November 2008)	Not triggered during the audit period. The Site Surface Water Management Plan (Storm Consulting, November 2008) was prepared and submitted prior to the audit period.	NT	NT	-	-
304	06_0139-3,25,h	h) The design calculations, detailed design plans and inspection, operation, monitoring and maintenance plan for the site stormwater management system shall be prepared in consultation with OEH and Council and submitted to the Director-General for approval prior to implementation and shall include any staging requirements/ assumptions. Detailed design plans shall comply with Council's Engineering Guide for Development Engineering Drawings requirements and shall be provided to the Director General within 3 years of the Project Approval (i.e.. by 2 November 2012) or when a development proposal is lodged for the subject land, whichever is the sooner.	Document review.	Site Surface Water Management Plan (Storm Consulting, November 2008)	Not triggered during the audit period. The Site Surface Water Management Plan (Storm Consulting, November 2008) was prepared and submitted prior to commencement of landfilling on the site.	NT	NT	-	-
305	06_0139-3,25,i	Inspection, monitoring and maintenance reports are to be provided to Council annually after the system is established and include details of the inspection, monitoring/ testing (as required) and maintenance activities conducted to demonstrate that the system is operating in accordance with the approved design performance standard.	Document review.		The audiee indicates the annual review has been prepared for the stormwater management system however this has not been submitted to Council for review. Subsequent evidence provided by DADI suggests this review has in fact been submitted to Council.	NC	C	-	-
306	06_0139-3,25,j	j) Note: Should minor adjustments to the Total Operational Area be approved in future(typically less than 10% of the overall Operational Area), then the permissible pre-development discharges must be recalculated in accordance with the parameters listed in Table 1 and an amended site stormwater management system design prepared, submitted to, approved by the Director-General and implemented in conjunction with the adjustment.	-	-	Not triggered during the audit period	NT	NT	-	-

Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
307	06_0139-3,25,k	The approved Total Operational Area site stormwater management system shall be constructed, owned, maintained in proper and efficient condition and operated in a proper and efficient manner by the developer at no cost to Council. Suitable restrictions on use satisfactory to and approved by the Director-General, shall be created over the title of the Total Operational Area to effect these requirements.	Document review. inspection.  Visual	WVI inspection (internal routine inspection records)	The auditor notes that checks of the stormwater infrastructure are contained within the internal site inspection checklist. On the basis of opportunistic inspection the stormwater inlets and sediment basins were observed to be in good condition during the site audit.	C	C	-	-
308	06_0139-3,25a	The Proponent shall prepare an Interim Stormwater Management Plan for the pre-sort enclosure, to the satisfaction of the Secretary. The plan must: a) be prepared in consultation with Council; b) include details and specifications for the detention basins in Catchment G (as shown in Proposed Future Stormwater Management Plan, Drawing No. SKC077, Issue P6, dated 26 October 2015; and letter from Genesis Xero Waste to Blacktown City Council, dated 4 November 2015); and c) satisfy the requirements of Council's Engineering Guide for Development (2005) and Blacktown Development Control Plan 2015.	-	-	Not triggered during the audit period	NT	NT	-	-
309	06_0139-3,25b	The Proponent shall construct the pre-sort enclosure in accordance with the Interim Stormwater Management Plan approved by the Secretary (as revised and approved by the Secretary from time-to-time) unless otherwise agreed by the Secretary.	-	-	Not triggered during the audit period	NT	NT	-	-
310	06_0139-3,25c	Prior to the commencement of construction of the pre-sort enclosure, the Proponent shall provide a temporary washdown facility for construction concrete trucks, which is to be located and constructed to prevent concrete wash from entering the Ropes Creek catchment.	-	-	Not triggered during the audit period	NT	NT	-	-
311	06_0139-3,26	Within three years of this approval, or when a Section 94 Contributions Plan that covers the site is made, whichever is sooner, the Proponent shall contribute toward the acquisition, design and construction of the Precinct Plan Stormwater Scheme. If a Section 94 Contributions Plan does not exist, the Proponent shall enter into a Voluntary Planning Agreement and/or works in kind deed of agreement with Council for those development contributions at that time. If a Section 94 Contributions Plan is not in place, the development contribution amount shall: a) be calculated by Council, (by apportioning the cost of the Precinct Plan Stormwater Scheme amongst the Precinct Plan landowners in the relevant catchments), and be to the satisfaction of the Director General; b) be calculated in accordance with the Land Acquisition (Just Terms Compensation) Act 1991; and c) be independently verified by a quantity surveyor whose appointment has been approved by the Director-General. The development contribution toward the Precinct Plan Stormwater Scheme should be calculated in accordance with developable areas (52.41 ha) detailed in at Appendix 3 and exclude the quarry void itself initially. Development Contributions toward the Precinct Plan Stormwater Scheme are payable for the quarry void area (22.602 ha) at least 12 months prior to the completion of landfilling	Document review.	Correspondence in regards to contributions plan.	The auditee indicates that as a result of a Court case in 2012 no contribution required of us to the Precinct Plan stormwater scheme. Refer to s 34(3) Agreement.	NT	NT	-	-
312	06_0139-3,27	The surface water, groundwater, and leachate monitoring program must: a) be generally consistent with the guidance in benchmark techniques 4, 5, 6, 7 and 8 of Appendix A of the DECCW's Environmental Guidelines for Solid Waste Landfills (1996, or the relevant sections of the latest version of the guideline); and b) include: - baseline data; - details of the proposed monitoring network; and - the parameters for testing and respective trigger levels for action under the surface water, groundwater and leachate response plan (see below).	Document review.	Groundwater Monitoring Plan, Genesis Facility Eastern Creek (IGGC, March 2012)  Letter prepared by Environ Consulting Services titled 'Request for confirmation of compliance with Approved Methods Publication- Genesis Landfill Facility'.	The auditor has sighted the Groundwater Monitoring Program for the site however the auditor has not obtained copies of any surface water or leachate monitoring programs.  The auditor has sighted a letter prepared by Environ Consulting Services titled 'Request for confirmation of compliance with Approved Methods Publication- Genesis Landfill Facility'. The letter states: "ECS can confirm that the groundwater and surface water monitoring conducted during the subject period have been performed in accordance with the sampling and analysis methods to be used when complying with a requirement by, or under, the environment protection legislation, or a license or notice under the legislation, to test for the presence or concentration of matter in water and the volume, depth and flow of water or waste water."	C	C	-	-
313	06_0139-3,28	The surface water, groundwater and leachate response plan must: a) include a protocol for the investigation, notification and mitigation of any exceedances of the respective trigger levels; and b) describe the array of measures that could be implemented to respond to any surface or groundwater contamination that may be caused by the development.	Document review.	Soil Water and Leachate Management Plan dated March 2017.	The surface water, groundwater and leachate response plan is a component of the Soil, Water and Leachate Management Plan. The plan includes consideration of actions that would be undertaken in response to exceedances of the trigger values. The plan is silent on what the actual trigger values are, and could be improved in the following manner: - Include firm actions that would be initiated in the event specific trigger levels are breached; - Include surface water, groundwater and leachate monitoring details such as locations, timing, parameters and sampling methodologies.	C	OBS	-	Revise the surface water, groundwater and leachate response plan to ensure it contains all required information.
314	06_0139-3,28a	The Proponent shall carry out bulk earthworks approved by Modification Application MP 06_0139 Mod 5 in accordance with the Spoil Management Plan Reference SMP 010915 dated September 2015 prepared by Genesis Xero Waste (subject to any revisions to the Spoil Management Plan that may be approved by the Secretary from time to time).	Document review. Visual inspection	Spoil Management Plan dated September 2015  PSE Pre Development Reports dated: 6/5/2016 13/5/2016 20/5/2016 30/5/2016 3/6/2016 10/6/2016 17/6/2016 27/6/2016 25/7/2016	The auditor has reviewed a sample of site inspection reports for the construction of the Mod 5 / pre-sort enclosure works. These reports indicate works were carried out in general accordance with the requirements of the Spoil MP.	C	C	-	-

Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
315	06_0139-3,29	The Proponent shall ensure that dust generated by the development does not cause additional exceedances of the criteria listed in Tables 1 to 3 at any residence on, or on more than 25 percent of, any privately owned land.	Document review Visual inspection	Dust suppression - water cart operating schedule/operator work records  Air Quality Monitoring Reports: - 2016 Q3 - 2016 Q2 - 2016 Q1 - 2015 Q4 - 2015 Q3	The site employs dust controls including sprinklers on outdoor stockpiles, fine mist sprays in the MPC building and a water cart for internal roads. The auditor did not observe excessive dust generation during the site visit.  Review of air quality monitoring reports indicate the site was compliant with dust related criteria contained within the EPLs and Project Consent during the audit period.  It is noted that this condition is relevant to an Official Caution 1536953 lodged by the EPA. This matter is discussed further in Audit Criteria 460.	C	C	-	-
316	06_0139-3,30	The Proponent shall not cause or permit the emission of offensive odours from the site, as defined under Section 129 of the POEO Act.	Document review. Site inspection	KMH Odour Assessment dated 20 March 2017 and 2 May 2016	The auditee provided the auditor with a copy of a field odour assessments prepared by KMH Environmental and Stephenson Environmental Management Australia dated 20 March 2017 and 2nd May 2016. The reports do not identify offensive odours being emitted from the site (across site boundaries).  The auditor did not observe any offensive odours during the audit site visit.	C	C	-	-
317	06_0139-3,31	If the Independent Environmental Audit (see Condition 7 of Schedule 5) recommends that the green waste area (see plan in Appendix 1) be enclosed to reduce the odour impacts of the project, then the Proponent shall enclose the area to the satisfaction of the Director-General within the timeframe specified by the Director-General.	-	-	The odour assessment does not recommend the green waste area be enclosed.	NT	NT	-	-
318	06_0139-3,31(a)	The Proponent shall ensure that each green waste bay has an individual cover and aerobic equipment fitted to reduce odour and the generation of leachate.	-	-	No green waste is understood to be accepted on the site, only timber waste.	NT	NT	-	-
319	06_0139-3,32	The Proponent shall implement all reasonable and feasible measures to minimise the dust generated by the project.	Document review Visual inspection	Dust suppression - water cart operating schedule/operator work records  Air Quality Monitoring Reports: - 2016 Q3 - 2016 Q2 - 2016 Q1 - 2015 Q4 - 2015 Q3	The site employs dust controls including sprinklers on outdoor stockpiles, fine mist sprays in the MPC building and a water cart for internal roads. The auditor did not observe excessive dust generation during the site visit.  Review of air quality monitoring reports indicate the site was generally compliant with dust related licence conditions during the audit period, suggesting the site is maintained in a condition which minimises dust.	C	C	-	-
320	06_0139-3,33	The Proponent shall seal all internal haul roads within the operational area of the project (see Operational Area at Appendix 3), with the exception of haul roads within the quarry void itself.	Visual inspection.	Visual Inspection	The auditor inspected internal haul roads and indicates that they are sealed.	C	C	-	-
321	06_0139-3,34	Prior to the commencement of operations, the Proponent shall ensure that water sprays or appropriate dust suppression measures identified in the EA are implemented within the site to provide effective dust suppression to all dust generating activities, including but not limited to dust generated by: a) crushing, screening and/or sorting operations; b) vehicles moving on unpaved surfaces; and c) the unloading of dry waste material.	Visual inspection.	-	The auditor sighted water sprays in the aggregate stockpiling area, inside the MPC building and a water cart operating on surface roads.	C	C	-	-
322	06_0139-3,35	During construction, the Proponent shall ensure that: a) all trucks entering or leaving the site with loads have their loads covered; and b) the trucks associated with the project do not track dirt onto the public road network.	-	-	Construction phase condition	NT	NT	-	-
323	06_0139-3,36	The Proponent shall implement all reasonable and feasible measures to minimise: a) energy use on site; and b) the scope 1, 2 and 3 greenhouse gas emissions produced on site, to the satisfaction of the Director-General.	Document review.	GENESIS Electricity usage analysis for the period of January 2016 - April 2017  Strategy to Minimise Energy Use and Reduce Greenhouse Gas Emissions, DADI, March 2017	The auditor has sighted strategies implemented by the site to minimise energy usage. The site is tracking energy usage.	C	C	-	-

Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
324	06_0139-3,37	The Proponent shall prepare and implement an Air Quality, Odour and Green House Gas Management Plan for the project to the satisfaction of the Director-General. This plan must: a) be prepared in consultation with EPA by a suitably qualified, experienced and independent expert whose appointment has been endorsed by the Director-General, and submitted to the Director-General for approval within 3 months of the date of this approval; b) describe in detail the measures that would be implemented on site to control the odour and air quality impacts of the project, and to ensure that these controls remain effective over time; c) identify triggers for remedial action; d) include a program for monitoring the air quality and odour impacts of the project including a real-time dust monitor to measure dust emissions during operation; e) Identify the number and location of continuous monitoring points for fine particulates (PM10) during each stage of works, ensuring sufficient representation of the relevant sensitive receptors at each stage of the proposed works; f) Include development and identification of PM10 concentration trigger levels at which: - Dust management actions must be taken, and specification of the relevant actions; and - Works at the site must cease. g) Include a program for monitoring subsurface gas, surface gas emission, and gas accumulation in general accordance with the guidance in sections 15-18 of Appendix A of the DEC's Environmental Guidelines for Solid Waste Landfills; and h) Include a protocol for remediating uncontrolled landfill gas emissions.	Document review.	Dial a Dump Industries EMS Air Quality Odour and Greenhouse Gas Management Plan (16 March 2017)  Letter of Approval from DoP (5 December 2011)  Dial a Dump EMS Landfill Gas Monitoring Program (February 2016)	The auditor has sighted the Management Plan and notes a previous version of the plan was approved by the DP&E. The current plan is understood to have been submitted to the DP&E for review but the auditor understands no response has been received.	C	C	-	-
325	06_0139-3,38	The Proponent shall ensure that noise from the project does not exceed the noise limits in Table 4 (36dB(A))  Table 4: Noise Impact Assessment Criteria Location Day, LAeq(15 minute) dB(A) = 37 Evening, LAeq(15 minute) dB(A) = 36 Morning Shoulder, LAeq(15 minute) dB(A) = 36	Document review	Genesis Eastern Creek Compliance Noise Assessment (Pacific Environment, 2015, 2016)	A noise monitoring programme is implemented on site (on a six monthly basis). Results of the programme indicate noise from the facility was not audible within the ambient noise environment at monitoring locations.  The same reports describe the preparation of a noise model to better characterise noise impacts of the facility. The report concludes that the results of the calibrated model indicate the facility complies with specified noise limits at the nearest residential receivers.	C	C	-	-
326	06_0139-3,39	The Proponent shall comply with the restrictions in Table 5  e 5: Construction and Operation Hours for the Project Activity Day Time Construction Monday – Friday 7:00am to 6:00pm Saturday 8:00am to 4:00pm Sunday and Public Holidays Nil Operation Monday – Friday 7:00am to 6:00pm Saturday, Sunday and Public Holidays 8:00am to 4:00pm	Document review	Employee clock on and off records	The auditor sighted the hours of operation stated on the front site entry and reviewed a sample of employee clock on and off data sheets for four days within the audit period. No instances of staff clocking on or off significantly outside of permitted working hours were observed.	C	C	-	-
327	06_0139-3,39(a)	Operating hours of the conveyor and chute system are to be restricted to the facility's operational hours as defined in condition 39 of Schedule 3.	Document review	Employee clock on and off records	The auditor sighted the hours of operation stated on the front site entry and reviewed a sample of employee clock on and off data sheets for four days within the audit period. No instances of staff clocking on or off significantly outside of permitted working hours were observed. It is noted that the conveyor and chute only operates when the plant is in operation.	C	C	-	-
328	06_0139-3,39(b)	Waste deliveries shall be restricted to the facility's operational hours as defined in condition 39 of Schedule 3.	Document review	Employee clock on and off records	The auditor sighted the hours of operation stated on the front site entry and reviewed a sample of employee clock on and off data sheets for four days within the audit period. No instances of staff clocking on or off significantly outside of permitted working hours were observed.	C	C	-	-
329	06_0139-3,39(c)	Notwithstanding condition 39 of Schedule 3, the MPC may be operated during the extended hours of 6am to 10pm Monday to Friday, and 6am to 4pm Weekends and Public Holidays.	-	-	-	NOTED	NOTED	-	-
330	06_0139-3,39(d)	Prior to the commencement of earthworks for the pre-sort enclosure, the Proponent shall install a temporary, non-earthen noise barrier on top of the quarry spoil pile which is sufficient in height to shield engine, excavation and truck loading noise associated with excavating the spoil pile. The barrier shall remain in place until the spoil pile provides sufficient noise shielding to the west and it shall be removed prior to the issue of an Occupation Certificate for the pre-sort enclosure. The barrier must not be comprised of shipping containers.				NT	NT		
331	06_0139-3,40	The Proponent shall prepare and implement a Noise Monitoring Program for the development, in consultation with DECCW, and to the satisfaction of the Director-General. This program must be submitted to the Director-General for approval prior to commencement of operations, and include a noise monitoring protocol for evaluating compliance with the noise impact assessment criteria in this approval.	Document review.	Dial A Dump Industries EMS Noise Monitoring Program (March 2017)  Series of Genesis Eastern Creek Compliance Noise Assessments ranging from (Pacific Environment and Thompson Environmental)	The previous Noise Monitoring Program (2011) was approved by the DECCW. The auditor understands that the revised plan was submitted to the DP&E for review however no response was received.  Review of noise monitoring reports for the audit timeframe suggests this noise monitoring programme has been implemented.	C	C	-	-



Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
332	06_0139-3,41	For the life of the Project, the Proponent shall ensure that there is a suitable meteorological station in the vicinity of the site that complies with the requirements in the latest version of approved Methods for Sampling of Air Pollutants in New South Wales guideline.	Document review.	One week sample of weather data provided from onsite weather station  Letter from Davcol electrical and plumbing to DADI dated 4.9.17	The auditor has sighted a sample of the data from the on-site weather station and confirms that an air quality station is present on site. It has not been confirmed whether this station complies with the requirements in the latest version of approved Methods for Sampling of Air Pollutants in New South Wales guideline.  The contractor who installed and now maintains the Rain Bird anemometer system at the site confirms that the system has been installed in accordance with relevant standards in the previously referenced letter.  It is noted however that a range of other weather stations are available in the vicinity of the site. Noise monitoring at the site utilises both local data and data from a BoM station at Horsley Park.	C	NV	-	-
333	06_0139-3,42	Access to the Project from Archibold Road is not permitted	-	-	-	NOTED	NOTED	-	-
334	06_0139-3,43	Access to the Project shall be via Old Wallgrove Road or Wonderland Drive, via the public Precinct Plan Road network, wherever a public road is available.	Visual inspection		Access is via Wonderland Drive.	C	C	-	-
335	06_0139-3,44	To facilitate both the construction of the sewer that will service the Project and the Precinct Plan Road that will eventually traverse Lot 10 DP241859, the Proponent shall grant access in favour of the owners of Lots 9 and 11 in DP241859, across Lot 10 DP 241859.	-	-	Not triggered during the audit period	NT	NT	-	-
336	06_0139-3,45	Within five years from the date of this approval or when an adjoining land owner is building a precinct road to a common boundary (whichever is sooner), the Proponent shall design and construct, to the satisfaction of Council, those parts of the Precinct Plan Road network that ultimately fall within the operational area of the facility (See Appendix 3). These precinct roads shall be dedicated to council, at no charge, to form part of the public road network.	-	-	Not triggered during the audit period. The auditee indicates that DADI intends to contribute to their respective part of the precinct road when this project is initiated.	NT	NT	-	-
337	06_0139-3,46	When a Precinct Plan road is constructed, the Proponent shall design and construct any new vehicular connections to the Precinct Plan Road, to the satisfaction of Council.	-	-	Not triggered during the audit period	NT	NT	-	-
338	06_0139-3,47	The Proponent shall: a) ensure that all internal site paved, trafficable or parking areas on site complies with AS2890.1 and/or AS2890.2 or their latest versions; and b) construct at least 50 parking spaces for employees and visitors with at least 2% of those spaces provided for disabled drivers, clearly marked and signposted.	-	-	Construction phase condition	NT	NT	-	-
339	06_0139-3,47(a)	Prior to the issue of an Occupation Certificate for the pre-sort enclosure, the Proponent shall construct an additional 10 parking spaces for employees and visitors to the pre-sort enclosure with at least 2 of the spaces provided for disabled drivers, clearly marked and signposted.	-	-	Not triggered during the audit period	NT	NT	-	-
340	06_0139-3,48	The Proponent shall ensure that vehicles associated with the project do not park or queue on the public road network at any time.	-	-	This requirement is not an ongoing issue and no management response occurs in relation to this matter. The distance between the weighbridge and the public road is nearly 900m and the auditee indicates this has not previously occurred to their knowledge.	C	C	-	-
341	06_0139-3,49	Within three years of the date of this approval, or when a Section 94 Contributions Plan that covers the site is made, whichever is sooner, the Proponent shall contribute toward the acquisition, design and construction of the Precinct Plan Road known as the 'Quarry / Link Road' (between Old Wallgrove Road and Wonderland Drive).  Any contribution made by the Proponent under this condition shall be calculated by and made to Council and be to the satisfaction of the Director-General. The Director-General's consideration of an appropriate level of contribution shall consider: a) the level of contribution made by all other landowners within the Eastern Creek Precinct Plan landowners; b) the level of contribution against the Land Acquisition (Just Terms Compensation) Act 1991; c) any independent verification from a quantity surveyor on the cost of the works, whose appointment has been approved by the Director-General; and d) the level of contribution against the entire operational area of the project (see Appendix 3).	-	-	The auditor understands the Precinct Road is still under planning and discussion with other affected Landowners Hanson and Australand and Blacktown City Council.	C	NT		
342	06_0139-3,50	The Proponent must enter into a Planning Agreement in accordance with the terms of its offer dated 25 November 2011 within 1 month after public notification has been given in accordance with section 93G.	-	-	Not triggered during the audit period	NT	NT	-	-
343	06_0139-3,51	The Proponent shall prepare and implement a Transport Code of Conduct for the development to the satisfaction of the Director-General. This protocol must: a) be submitted to the Director-General for approval prior to the commencement of operations; b) be prepared in consultation with the RTA and Blacktown Council; and c) describe the measures that would be implemented to: • minimise the impacts of the development on the local and regional road network, including traffic noise.	Document review. Visual inspection	Transport Code of Conduct	The auditor has reviewed the Transport Code of Conduct. Key management measures in this Code consists of signage and management of overloading. Directional and speed signage was sighted on the site, and the auditor understands the site operator has controls in place to ensure overloading of outgoing trucks does not occur.	C	C	-	-

Table 3 - Project Approval 06\_0139 (Mod 5)

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344	06_0139-3,52	The Proponent shall ensure that the lighting associated with the project: NSW Government Department of Planning 16 a) complies with the latest version of AS 4282(INT) - Control of Obtrusive Effects of Outdoor Lighting; and b) is mounted, screened and directed in such a manner t	-	-	No changes to the lighting of the site have been made since the previous audit.	NT	NT	-	-
345	06_0139-3,53	The Proponent shall prepare design details for the visual screens, impervious barriers and amenity berms being implemented for the facility, having regard to adjoining landowners. This design detail must be submitted to the Director-General for approval prior to the commencement of construction or regrading of the amenity berms, visual screens or impervious barriers.	-	-	Not triggered during the audit period	NT	NT	-	-
346	06_0139-3,54	Prior to the commencement of operations, the Proponent shall: a) construct and maintain, for the duration of the operations, amenity berms, impervious barriers and visual screens around the perimeter of the operational area (as detailed in the EA , the sit plan at Appendix 1 and Schedule 3, Condition 53 above); b) retain the existing amenity berm to the north east of the quarry void at the perimeter; c) vegetate the berms in accordance with the Landscape and Vegetation Management Plan at Schedule 3, condition 59; d) maintain the height of the amenity berms at no less than 10 metres; and e) conduct all earth works require	Visual inspection	-	The auditor sighted the amenity berms and notes that they are vegetated with grasses. Earthworks appear to have been undertaken on the western side of the site (near the sediment basins). It is noted that this area will require re-vegetation following the earthworks or temporary revegetation / erosion control.	C	OBS	-	Review erosion and sediment control practices for works underway on the western amenity berm. Revegetate this area with native grasses following works.
347	06_0139-3,55	No stockpile on site should exceed the height of the berms, impervious barriers or visual screens.	Visual inspection.	-	No stockpile was observed to be higher than the amenity berms during the audit. The auditor further notes that the auditee indicates the stackers can not extend over 10 and hence cannot create stockpiles in excess of this height (noting the berms are in excess of 10m height)	C	C	-	-
348	06_0139-3,56	The Proponent shall not install any signage or fencing on site without the written approval of the Director-General. In seeking this approval the Proponent shall: f) submit detailed plans of the proposed signage or fencing, which have been prepared in consultation with Council; and g) demonstrate that the proposed signage or fencing is consistent with the relevant requirements from Council.	-	-	No new signage or fencing was installed on site during the audit period.	NT	NT	-	-
349	06_0139-3,57	The Proponent shall not disturb those areas identified as Conservation Areas in the Precinct Plan and identified and mapped in the EA.	Visual inspection Document Review	Landscape and Vegetation Management Plan, Fencing and Security Management Plan	The auditor inspected the Conservation Area and the area is fenced off. Whilst the area has not been disturbed by the proponent, the auditor saw evidence of illegal access and bicycle riding in this area.	C	OBS	-	Rehabilitate all areas of the conservation area degraded by illegal access / bike riding.
350	06_0139-3,58	FLORA AND FAUNA MANAGEMENT The Proponent shall not disturb those areas identified as Conservation Areas in the Precinct Plan and identified and mapped in the EA.	Refer to above	Refer to above	Refer to above	Refer to above	Refer to above	Refer to above	Refer to above
351	06_0139-3,59	The Proponent shall prepare and implement a Landscape and Vegetation Management Plan for the project to the satisfaction of the Director-General. This plan must: a) be prepared in consultation with NOW and Council and be submitted to the Director General for approval within 3 months of this approval; b) be prepared in accordance with NOW's Guidelines for Controlled Activities – Vegetation Management Plans; and c) include: • a Landscape Plan for the project, which identifies screen plantings to minimise visual impacts, particularly on the amenity berms; • detailed plans and procedures to: - restore and maintain the waterways and riparian zones of the Ropes Creek Tributary on the site; - manage weeds in the vicinity of the riparian zones; - integrate works into the proposed landscaping for the rest of the site; - manage impacts on fauna; and - monitor the performance of the proposed restoration works. d) Provide details on how those areas identified as Conservation Areas in the Precinct Plan shall be actively managed for conservation purposes including: - improving the quality of the vegetation in these areas - measure to control pests vermin,	Visual inspection Document Review	Dial a Dump Industries EMS Landscape and Vegetation Management Plan (June 2011, revised 5 November 2015)  DP&E Notice of Determination (endorsement letter) dated 5th December 2011.	The auditor notes that the 2011 LVMP was approved by the DP&E and subsequent revisions of the plan were submitted to the DP&E for approval, however no response was received. Feedback received from DPI Water in regards to this audit suggests there are elements within the Plan that the department recommends are revised.  Please refer to further consideration of this issue in Audit Criteria #479.	-	-	-	-
352	06_0139-3,60	The Proponent shall not disturb those areas identified as High Sensitivity in McDonald 2005.	Visual inspection	-	The auditor reviewed high sensitivity areas (within the conservation area) and notes that this area is fenced and has not been disturbed by the site operator during the audit period.	C	C	-	-




Table 3 - Project Approval 06_0139 (Mod 5)									
Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
353	06_0139-3,61	The Proponent shall prepare and implement an Aboriginal Heritage Management Plan, in consultation with the OEH, and to the satisfaction of the Director-General. The Plan must: a) be submitted to the Director-General for approval prior to the commencement of construction; b) be prepared by a suitably qualified archaeologist; c) be consistent with the management principles defined in McDonald 2005; d) include a strategy for the salvage and long term management of salvaged objects; e) include procedures for topsoil stripping and sub-surface excavation works in areas of moderate sensitivity and supervision by a qualified archaeologist; f) identify procedures to be followed should previously unidentified objects be uncovered or additional impacts to sites be identified; g) measures to protect Aboriginal heritage values of those areas marked high sensitivity in McDonald 2005; and h) include a procedure for continued consultation with Aboriginal stakeholders.	Visual inspection	-	The auditor reviewed high sensitivity areas (within the conservation area) and notes that this area is fenced and has not been disturbed by the site operator during the audit period.	C	C	-	-
Schedule 4: Rehabilitation and Closure									
354	06_0139-4,1	The final landform for the landfill shall generally be in accordance with the plan at Appendix 4. All earth works required to reach this final landform shall be conducted on site, without impacting on adjoining landowners.	-	-	Not triggered during the audit period	NT	NT	-	-
355	06_0139-4,2	Rehabilitation / Closure Plan Upon cessation of landfilling, the Proponent shall decommission the landfill and rehabilitate the site. The Proponent shall prepare and implement a Rehabilitation and Closure Plan. This plan must: a) Be prepared in consultation with DECCW, and Council b) Be prepared by a suitably qualified and experienced expert; c) Be submitted to the Director-General for approval within 3 years of commencement of operations; d) Define the objectives and criteria for rehabilitation and closure; e) Investigate options for the future use of the site; f) Describe the measures that would be implemented to achieve the specified objectives and criteria for the rehabilitation and closure; g) Calculate the cost of implementing these measures; and h) Describe how the performance of these measures would be monitored over time.	Document Review	Landfill Rehabilitation and Closure Plan, prepared by Consulting Earth Scientists 23 February 2017	The auditor has reviewed the LRCP. Evidence of compliance status with respect to the following requirements has not been identified: <i>This plan must:</i> <i>a) Be prepared in consultation with DECCW, and Council</i> <i>b) Be prepared by a suitably qualified and experienced expert;</i> <i>c) Be submitted to the Director-General for approval within 3 years of commencement of operations.</i>	C	NC	LOW	Update the Landfill Rehabilitation and Closure Plan consistent with the requirements of project consent 06_0139-4,2
Schedule 5: Environmental Management, Reporting & Auditing									
356	06_0139-5,1	Environmental Management Strategy The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. The Strategy must: a) be submitted to the Director-General for approval prior to the commencement of construction; b) provide the strategic framework for environmental management of the project; c) identify the statutory approvals that apply to the project; d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project; e) describe the procedures that would be implemented to: • keep the local community and relevant agencies informed about the operation and environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; and • respond to emergencies; f) include: • copies of the various strategies, plans and programs that are required under the conditions of this approval once they have been approved; and • a clear plan depicting all the monitoring currently being carried out within the project	Document Review	EMS Incorporating (November 2011) Dial a Dump Industries Aboriginal Heritage Management Plan (Revised 31 March 2015) Dial a Dump Industries EMS Traffic and Transport Code of Conduct Dial a Dump Industries EMS Green Waste Management Plan Issue 2.1 (5 November 2015) Dial a Dump Industries EMS Air Quality Odour and Greenhouse Gas Management Plan (31 March 2015) Dial a Dump Industries EMS Noise Monitoring Program (31 March 2015) Vegetation Management Plan for LHBC (Abel Ecology, 22 October 2009) Dial a Dump Industries EMS Amenity Berms Management Plan (July 2011) Dial A Dump Industries EMS Fencing and Security Plan (5 November 2015) Dial A Dump Industries EMS Pests, Vermin and Weeds Management Plan (June 2011 and Revised March 2015) The Leachate Collection, Conveyance and Management System (Crespi Projects, 2011) Dial a Dump Industries EMS Conveyor and Chute Waste Handling Procedures (Revised 31 March 2015)	The auditor has reviewed the site's EMS which was originally prepared as part of the project's Environmental Assessment. It is understood the EMS was reviewed and approved by the DP&E at this time. The site operator has revised a number of the management plans contained within the EMS to ensure currency with operations is maintained.	C	C	-	-
357	06_0139-5,2	The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include: a) detailed baseline data; b) a description of: · the relevant statutory requirements (including any relevant approval, licence or lease conditions); · any relevant limits or performance measures/criteria; · the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures; c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; d) a program to monitor and report on the: · impacts and environmental performance of the project; · effectiveness of any management measures (see c above); e) a contingency plan to manage any unpredicted impacts and their consequences; f) a program to investigate and implement ways to improve the environmental performance of the project over time; g) a protocol for managing and reporting any: · incidents; · complaints; · non-compliances with statutory requirements; and · exceedances of the impact assessment criteria and/or performance criteria; and h) a protocol for periodic review of the plan.	-	-	Assessed within the sections relating to those management plans - see 'ENVIRONMENTAL MANAGEMENT PLANS AND PROCEDURES' section of this report.	-	-	-	-

Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
358	06_0139-5,3	By the end of December 2010, and annually thereafter, the Proponent shall review the environmental performance of the project to the satisfaction of the Director-General. This review must: a) describe the works that were carried out in the past year, and the works that are proposed to be carried out over the next year; b) include a comprehensive review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the <ul style="list-style-type: none"><li>the relevant statutory requirements, limits or performance measures/criteria;</li><li>the monitoring results of previous years; and</li><li>the relevant predictions in the EA;</li></ul> c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; d) identify any trends in the monitoring data over the life of the project; e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and f) describe what measure will be implemented over the next year to improve the environmental performance of the project.	Document review.	2016 Annual Environment Review – Genesis Xero Waste Recycling & Landfilling Facility (DADI)  2015 Annual Environment Review – Genesis Xero Waste Recycling & Landfilling Facility (DADI)	The auditor has reviewed the 2015 and 2016 Annual Environment Reviews. The reviews capture the information required by this condition. It is unclear whether the Annual Review documents have been endorsed by the DP&E.	C	C	-	-
359	06_0139-5,4	Within 3 months of the submission of an: a) audit under condition 7 of schedule 5; b) incident report under condition 5 of schedule 5; and c) annual review under condition 3 of schedule 5, the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Director-General.	Document review.	Dial a Dump Industries Aboriginal Heritage Management Plan (Revised 31 March 2015) Dial a Dump Industries EMS Traffic and Transport Code of Conduct Dial a Dump Industries EMS Green Waste Management Plan Issue 2.1 (5 November 2015) Dial a Dump Industries EMS Air Quality Odour and Greenhouse Gas Management Plan (31 March 2015) Dial a Dump Industries EMS Noise Monitoring Program (31 March 2015) Vegetation Management Plan for LHBC (Abel Ecology, 22 October 2009) Dial a Dump Industries EMS Amenity Berms Management Plan (July 2011) Dial A Dump Industries EMS Fencing and Security Plan (5 November 2015) Dial A Dump Industries EMS Pests, Vermin and Weeds Management Plan (June 2011 and Revised March 2015) The Leachate Collection, Conveyance and Management System (Crespi Projects, 2011) Dial a Dump Industries EMS Conveyor and Chute Waste Handling Procedures (Revised 31 March 2015)	The auditor understands that the management plans for the site were reviewed in 2015 following the IEA undertaken at that time. The auditee indicated that the plans were submitted to the DP&E for review but they are yet to receive a response.	C	C	-	-
360	06_0139-5,4b	Within 3 months of any modification to this approval, the Proponent shall review, and if necessary, revise the strategies, plans, and programs required under this approval to the satisfaction of the Secretary.	As above						
361	06_0139-5,5	The Proponent shall notify the Director-General and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent shall provide the Director- General and any relevant agencies with a detailed report on the incident.	-	Genesis Incident Report Form and Register	The auditee indicates that no relevant incidents have occurred during the audit period.	NT	NT	-	-
362	06_0139-5,6	The Proponent shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval, and to the satisfaction of the Director-General.	Visual inspection of the DADI website	-	The auditor reviewed the surface water, groundwater and dust monitoring results which are available on the DADI website.	C	C	-	-
363	06_0139-5,7	Within 6 months of the commencement of operation, and every 2 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must: a) be conducted by suitably qualified, experienced and independent team of experts (including an odour expert), whose appointment has been endorsed by the Director General; b) include consultation with the relevant agencies; c) include a full odour audit of the project, taking into consideration the relevant technical guidelines and any odour complaints made since the previous audit; d) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL (including any assessment, plan or program required under these approvals); e) review the adequacy of strategies, plans or programs required under these approvals; and, if appropriate; and f) recommend measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under these approvals.	Document Review	Independent Environmental Audit (Cardno, 21 August 2015, 12th April 2016)	The auditor sighted the Independent Environmental Audit (Cardno, 21 August 2015, 12th April 2016)	C	C	-	-
364	06_0139-5,8	Within 6 weeks of the completing of this audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General, together with its response to any recommendations contained in the audit report.		Cover Letter from DADI to Mr Mooney of the DP&E 'Genesis Facility (Eastern Creek) – Response to Independent Environmental Audit Recommendations' dated 9th May 2016	The auditor sighted a cover letter which indicates the previous IEA was submitted to the DP&E within the 6 week timeframe.	C	C	-	-

Table 3 - Project Approval 06\_0139 (Mod 5)

Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
365	06_0139-5,9	From the end of 2009, the Proponent shall make the following information publicly available on its website: a) a copy of all current statutory approvals; b) a copy of the current environmental management strategy and associated plans and programs; c) a summary of the monitoring results of the project, which have been reported in accordance with the various plans and programs approved under the conditions of this approval; d) a complaints register, which is to be updated on a monthly basis; e) a copy of any Annual Reviews (over the last 5 years); f) a copy of any Independent Environmental Audit, and the Proponent's response to the recommendations in any audit; and g) any other matter required by the Director-General.	Visual inspection of the DADI website	Visual inspection of the DADI website	The auditor has reviewed the information on the DADI website and is of the opinion that all the required documents are present with the exception of: - The Mod 5 Approval - Proponent's response to the recommendations of previous audits; - Up to date Environmental Management Plans (noting one revised plan is available on the website).	C	ANC	ANC	Ensure all required information and documentation is available for public viewing via the DADI website, including: - The Mod 5 Approval - Proponent's response to the recommendations of previous audits; - Up to date Environmental Management Plans (noting one revised plan is available on the website).

Table 4 - Environmental Assessment (Light Horse Business Centre Volume 1: Environmental Assessment Report)									
									
Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
<b>Compliance Assessment Criteria:</b> C - Compliant NC - Non-Compliant ANC - Administrative non-compliance NV - Not Verified NT - Not Triggered OBS - Observation NOTED									
<b>3: Construction and Operation EMP</b>									
366	3	A Construction Environmental Management Plan (CEMP) and an Operational Environmental Management Plan (OEMP) will be developed and approved by the Director- General	-	-	The Operational Environmental Management Plan (OEMP) was previously endorsed by the Department of Planning, though not within the audit period.	NT	NT	-	-
<b>5. Operational Environmental Performance</b>									
367	5.1.1	A detailed stormwater management plan shall be developed and include the requirements set out in the Surface Water Report prepared by Storm Consulting dated April 2008, which will include management for spills from drainage lines, sediment traps, check dams, erosions control, bunds infiltration areas, sediment fences, filters and all other erosion and sediment control devices.	-	-	The Site Surface Water Management Plan was previously prepared and approved prior to the audit period.	NT	NT	-	-
368	5.1.2	Water sampling at the OSD basin and in pit stormwater pond to be conducted quarterly for the first 12 months of operations and six-monthly for following years to ensure re-used /released water is of the appropriate quality for end-use in accordance with ANZECC guidelines and relevant NSW guidance and the sites Environmental Protection Licence. Water sampling shall test for compliance with specified water quality standards for discharge. Sampling requirements will include TSS, turbidity, ammonia, Biochemical Oxygen Demand, TN and TP.	Document Review	Surface Water Quality Monitoring EPL 13426 and 20121 - quarterly monitoring 2015 - 2017	The auditor has sighted periodic (believed to be quarterly) surface water monitoring data for the sediment basins.  Interpretive reports have not been sighted in respect to this surface water data, and it is unclear whether the water in the basins was of sufficient quality for discharge, with respect to the guidelines referenced in the condition. Data for BOD, TN and TP have not been sighted by the auditor and it is unclear whether this data has been collected.	C	C	-	-
369	5.1.3	An OSD basin and Gross Pollutant Trap Cleaning Program to be implemented to provide more frequent monitoring as site settles from development. A maintenance and monitoring check-sheet shall be developed that allows for the data entry, location of stormwater management devices on-site (e.g. based on a map with numbered locations), type of monitoring (visual, water sampling, etc), outcome (e.g. all clear, device needs cleaning), actions taken, and any follow up required.	Document Review	OSD Inlet Monitoring Programme records	The existing OSD Inlet Monitoring Programme captures much of this information however it does not extend to the sediment basins.	C	NC	LOW	Refer to the recommendation for Audit Criteria #51.
370	5.1.4	Periodic removal of sediment and other materials from site storages and sediment traps and waste oil and sludge from the oil / water separators and wheel wash sediment separator, immediate stabilisation and disposal at an appropriate off-site facility. Storage dams will have markers that indicate when sediment is to be removed so that minimum storage requirements can be maintained.	Document Review	Invoice from Davcol Pty Ltd for the "Service and cleaning of two storm water gross pollutant traps" including minor servicing every 3 months and one major service per year for the period 2015 - 2016.	The auditor understands sediment basins are checked every three months and serviced annually. No oil - water separators are believed to exist on site. The two sediment basins on the site were observed to have depth markers.	C	C	-	-
371	5.1.5	Diesel fuel will be stored in bunded above ground double skin diesel fuel tanks located near the workshop. The tanks will be designed and manufactured in accordance with AS1940 and AS1692. Any refuelling facilities or fuel/ chemical (including oil and lubricant) storages, are to be located in covered, bunded areas or self bunded storage containers, designed to prevent the entry of stormwater and capable of containing the full storage volume of the container plus an additional 10%.	Visual inspection	-	No diesel storage tanks were located on site during the audit period. One (single skinned) IBC containing oil was observed near the MPC entry. This IBC was sitting on a self bunded pallet, which apart from being punctured, did not hold 110% of the volume of the container.	C	NC	LOW	Refer to audit criteria #59
372	5.1.6	Potential spills will be contained, in the first instance, by bunding and grading to sumps with backup containment created by the main storage basins. Spill kits will be available on-site and staff will be trained in their use to contain spills and prevent them from entering the stormwater drainage system. Runoff from areas where spills can occur will not be discharged off-site.	Document Review	DADI Oil Spill/Fuel/ AD-Blue Clean up Procedure  Training records in relation to the above -referenced procedure.	DADI Oil Spill/Fuel/ AD-Blue Clean up Procedure is considered adequate guidance for spill response.	C	C	-	-

## Table 4 - Environmental Assessment (Light Horse Business Centre Volume 1: Environmental Assessment Report)



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
373	5.2.1	A groundwater monitoring program is to be prepared to the satisfaction of DECC and the Environmental Protection Licence (EPL) issued for the Project to satisfy reporting requirements.	-	-	The groundwater monitoring plan was submitted prior to the audit period. This has not been updated during the audit period.	NT	NT		
374	5.3.1	The LEMP will set out leachate management to maintain the collection and treatment system. Visual inspections of the leachate collection system (sump and riser) shall be undertaken quarterly for the first 18 months of initial operations and if no adverse impacts of operations is observed, will be reduce to every 6 months throughout the life of the Landfill and RRF. Visual inspection shall also occur proceeding significant rainfall events. Submission of water quality monitoring results shall be submitted to the relevant authority as required by the EPL.	Document Review	Landfill Environmental Management Plan (LEMP) (Douglas Partners, December 2011)  Soil, Water and Leachate Management Plan (SWLMP) 2017  Site Project Officer Workplace Visual Inspection - Daily and Fortnightly Checks - various dates in 2016 and 2017	LEMP was prepared prior to the audit period and hence this aspect of the condition is NT.  The auditee has provided records of general site inspections titled WVI inspections which are undertaken weekly and fortnightly. While this checklist includes an item titled "The site including the leachate tank farm is free of offensive odours" it is unclear whether the system (sump and riser) are subject to inspection. Furthermore it is unclear whether inspections occur specifically prior to rain. Hence while some inspection of the system occurs, this is considered an area where opportunity for improvement exists.	C	<b>OBS</b>	-	Inspect the leachate collection system at minimum intervals of 6 months. Retain this information for environmental management and audit purposes.
375	5.3.2	The leachate collection system shall be monitored for clogging every year throughout the life of the landfill and RRF. The system shall be unclogged as required to maintain the level of leachate within the pit below the regional groundwater table.	Document Review	-	The auditee has provided ERM with eight Sydney water Routine Inspection forms for Trade Waste Agreement/Consent Number: 35580f. The auditee understands that by manner of deduction the auditee can confirm an absence of presence of clogging by comparing the information on these reports to other data collected from the leachate conveyance and monitoring system.	C	C	-	-
376	5.4.1	A real-time dust monitoring and reactive control system will be implemented to identify activities that may lead to off-site air quality impacts. The dust monitoring can be used to assess compliance with DECC ambient air quality criteria. A minimum of one real time monitor (e.g. DustTrak, TEOM, E-Bam, E-Sampler) will be used to identify real-time impacts and delineate short term particulate matter concentrations and thus trigger required maintenance/ repairs or development of engineering solutions.	Document review	Letter of conformance from Thomson Environmental Systems in respect to air monitoring equipment dated 27/7/17.	Review of a letter of conformance in respect to the air monitoring equipment used on the site indicates: "Thermo FH62 BAM used for monitoring of PM10 according to the manufacturer's specifications, and in general accordance to the relevant Australian standard (AS/NZS 3580.9.10:2017 Methods for sampling and analysis of ambient air - Determination of suspended particulate matter - PM10 beta attenuation monitors)"	C	C	-	-
377	5.4.2	Monitoring will be undertaken as per DECC (1996) Environment Guidelines: Solid Waste Landfills for the gas management system. Unless otherwise approved by DECC, monitoring will be conducted monthly for initial operations, and if no adverse impacts are observed, will be reduced to quarterly after six months of operations and to annually after 18 months of operation.	Document Review	Landfill gas monitoring reports prepared by Pacific Environment dated: December 2015 June 2016 March 2016 September 2016	The auditor has sighted quarterly landfill gas monitoring records for 2016.	C	C	-	-
378	5.4.2	Monitoring would include a walkover along chimneys with monitoring of landfill gas (methane and hydrogen sulfide) undertaken using a suitable LFG monitor e.g. GA 2000, capable of reading % gas and % LEL.	Document Review	Landfill gas monitoring reports prepared by Pacific Environment dated: December 2015 June 2016 March 2016 September 2016	The auditor has sighted quarterly landfill gas monitoring records for 2016.	C	C	-	-

# Table 4 - Environmental Assessment (Light Horse Business Centre Volume 1: Environmental Assessment Report)



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
379	5.4.2	Monitoring shall also include recording of odour observations including the monitoring of BioMagic key odour sources to minimise emissions.	Document Review	Landfill gas monitoring reports prepared by Pacific Environment dated: December 2015 June 2016 March 2016 September 2016	The auditor has sighted quarterly landfill gas monitoring records for 2016.	C	C	-	-
380	5.4.3	An Air Quality Management Plan (AQMP) shall be prepared which will be included in the LEMP and EWMP to be developed for the Project, with a focus on activities which generate the most significant emissions – in this instance those associated with haulage movements and transfer and loading activities.	-	-	Dial a Dump Industries EMS Air Quality Odour and Greenhouse Gas Management Plan was prepared in June 2011, which is prior to the audit period.	NT	NT	-	-
381	5.5.1	On-site plant and equipment are to be properly maintained to ensure rated noise emission levels are not exceeded.	Document Review	MPC Maintenance Reports dated: 3/5/2016 1/8/2016 21/10/2016 24/1/2017  Nine MPC Maintenance Shift Reports for 2016 and 2017	Review of maintenance records indicates plant and equipment on the site are maintained regularly.	C	C	-	-
382	5.5.2	With the application of reasonable and feasible mitigation, operational noise levels at residences will not exceed 55bB(A)Leq,15min.	Document Review	Genesis Eastern Creek Compliance Noise Assessment (Pacific Environment, 2015, 2016)	A noise monitoring programme is implemented on site (on a six monthly basis). Results of the programme indicate noise from the facility was not audible within the ambient noise environment at monitoring locations.  The same reports describe the preparation of a noise model to better characterise noise impacts of the facility. The report concludes that the results of the calibrated model indicate the facility complies with specified EPL noise limits at the nearest residential receivers.	C	C	-	-
383	5.5.3	A contact telephone number will be provided on a sign on the site fence for the public to seek information or make a noise complaint.	Visual inspection.	-	Emergency contact numbers are provided on the site entry signage. It is noted that the number of an environmental complaints line is provided on the DADI website.	C	C	-	-
384	5.5.4	A log of noise complaints will be maintained and actioned in a responsive manner.	Document Review	Complaints Register for the site, updated August 2017	Review of the complaints register indicates no noise complaints have been received during the audit timeframe.	C	C	-	-
385	5.5.5	Normal hours of operation between 6am to 10pm, with landfilling operations further restricted to the hours between 6am and 6pm (receivable material would only occur after 10pm on occasion). A public notice shall be posted on the site fence informing the public when waste will be received after normal hours of operation.	Document Review	Employee clock on and off records	The auditor sighted the hours of operation stated on the front site entry and reviewed a sample of employee clock on and off data sheets for four days within the audit period. No instances of staff clocking on or off significantly outside of permitted working hours were observed.	C	C	-	-
386	5.6.1	Regular monitoring of the road network is to be undertaken throughout the life of the landfill and the ongoing operation of the RRF. Any reported damage to the road network is to be recorded and repaired within a timely manner.	-	-	Road inspections are undertaken by Council for roads under their care and maintenance. No requests for repair have been received by Council.	NT	NT	-	-
387	5.7.1	Where possible, use of highly reflective external materials/ colours on the site will be avoided unless necessary for safety reasons.	Visual inspection.	-	No highly reflective external colours or building materials were observed during the site audit.	C	C	-	-
388	5.7.2	LHBC will operate outdoor lighting in accordance with Australian Standards AS4282-1977 'Control of Obtrusive Effects of Outdoor Lighting' and AS1158 'Lighting for Roads and Public Places'. The lighting will be kept to the minimum necessary to safety and efficiency purposes and will be directed away from residences and roads through the use of directional lighting equipment and shielding.	Visual inspection.	Letter from Robert Smith Electrical dated 29th March 2016	The auditor has sighted a letter of conformance from a licenced electrician confirming that lighting on the site is compliant with AS4282-1977.	C	C	-	-
389	5.7.3	LHBC will maintain building elements using muted colours which blend into the surrounding natural environment.	Visual inspection.	-	No highly reflective external colours or building materials were observed during the site audit.	C	C	-	-
390	5.7.4	The site is will be maintained in an orderly manner and the material stockpiles, waste, plant, equipment and vehicle parking will be kept to designated areas.	Visual inspection.	-	On the basis of a visual inspection of the site during the site audit, the auditor confirms that generally speaking the site is maintained in an orderly manner.	C	C	-	-
391	5.7.5	LHBC shall maintain landscaped areas on site throughout operations.	Visual inspection.	-	On the basis of a visual inspection of the site during the site audit, the auditor confirms that all landscaped areas (in particular the vegetated amenity berms along the driveway) were maintained.	C	C	-	-



# Table 4 - Environmental Assessment (Light Horse Business Centre Volume 1: Environmental Assessment Report)



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
392	5.8.1	The risk of soil contamination by spills will be minimised throughout the Project by implementation of appropriate procedures for safe handling and storage of fuel and chemicals and spill response procedures.	Document Review	DADI Oil Spill/Fuel/ AD-Blue Clean up Procedure  Training records in relation to the above -referenced procedure.	DADI Oil Spill/Fuel/ AD-Blue Clean up Procedure is considered adequate guidance for spill response is considered adequate guidance for spill response. The auditor did not sight any procedures in relation to the handling and storage of fuel and chemicals. It is noted that the Leachate Soil and Water Management Plan contains some guidance on chemical and hydrocarbon management.	C	OBS	-	Preparation of a stand-alone chemical and hydrocarbon storage and handling procedure would assist staff in the correct handling of such during refuelling and maintenance activities.
393	5.8.2	Provide and maintain Asset Protection Zones (APZs)	Document review Visual inspection.	Bushfire Hazard Assessment (Holmes Fire & Safety, 31 July 2008)  EHS System Procedure - Minimising the Risk of Fire at the Premises and outlining the implementation and maintenance of Bushfire Asset Protection Zones on site	No evidence has been sighted that asset protection zones have been maintained on the site however the auditor notes that a procedure has been prepared that identifies the APZs and provides guidance for their maintenance.	C	NV	-	Ensure all asset protection zones are maintained in accordance with the requirements of Homes (2008). Retain records of all bushfire asset protection zone maintenance activities.
394	5.8.3	Emergency Response Procedures including evacuation procedures shall be developed for the occurrence of a fire.	Document Review	"Fire Evacuation Diagrams"  Emergency Evacuation Manual (First Five Minutes, 16th March 2016)	The Emergency Evacuation Manual provides an evacuation procedure for the site.	C	C	-	-
395	5.8.4	Geotechnical inspections of the pit shall be undertaken every 6 months and any identified stability issues rectified as required. All geotechnical inspections shall be documented and reported as part of a management plan of the pit integrity.	Document Review	'Geotechnical Quarry Slope Stability Assessment' report prepared by Jeffery and Katauskas Pty Ltd dated 17 March 2008  "Slip Reports" prepared by DADI dated 16/1/2017, 13/2/2017, 10/4/2017, 8/5/2017 and 13/6/2017.	The geotechnical report referenced was prepared prior to the audit period and the auditor understands no further geotechnical investigations have been undertaken during the audit period.  The slip reports provided have not been undertaken at the required 6 monthly intervals through the audit period, and they do not consider the pit generally (only one part of the pit where a slip has been previously identified). Moreover it is unclear whether these inspections have been undertaken by a geotechnical engineer, and hence whether they can be considered 'geotechnical inspections'.	C	NC	High <sup>1</sup>	Ensure geotechnical inspections of the pit are undertaken at the required intervals. It is recommended that all geotechnical advice provided on the project is provided by a suitably qualified and experienced geotechnical engineer.
396	5.9.1	A Site Environmental Waste Management Plan (SEWMP) shall be produced to manage general waste streams produced during operations. The SEWMP shall be made available to all operational staff upon commencement of employment. The SEWMP shall ensure putrescible waste and recycling waste receptacles are provided within the RRF and associated buildings. The SEWMP will ensure that all putrescible waste shall be collected and disposed of off-site.	Document Review	Dial A Dump Industries EMS Waste Monitoring Program dated November 2015	The auditor has sighted the Waste Monitoring Program for the site.	C	C	-	-
397	5.10.1	Inventory of emissions will be prepared and maintained to monitor greenhouse gas throughout the life of the Project.	Document Review	Greenhouse Gases (GHG) Inventory prepared by Environ Consulting Services and dated 12 April , 2017  GENESIS Electricity usage analysis for the period of January 2016 - April 2017  Strategy to Minimise Energy Use and Reduce Greenhouse Gas Emissions, DADI, March 2017	The auditor has reviewed a document titled 'Greenhouse Gases (GHG) Inventory prepared by Environ Consulting Services and dated 12 April , 2017. The auditor believes this document adequately addresses the requirements of this condition.	C	C	-	-
398	5.10.2	Undertake an internal review annually to identify techniques to minimise energy use and assess if equipment is operating at optimum energy efficiency. Internal review to address inventory of emissions levels.	Document Review	Greenhouse Gases (GHG) Inventory prepared by Environ Consulting Services and dated 12 April , 2017  GENESIS Electricity usage analysis for the period of January 2016 - April 2017  Strategy to Minimise Energy Use and Reduce Greenhouse Gas Emissions, DADI, March 2017	The auditor has reviewed a document titled 'Greenhouse Gases (GHG) Inventory prepared by Environ Consulting Services and dated 12 April , 2017. The auditor believes this document adequately addresses the requirements of this condition.	C	C	-	-
399	5.10.3	Energy efficiency to be a priority for of all new mobile and fixed equipment during procurement for both diesel and electric powered equipment.	Document Review	Strategy to Minimise Energy Use and Reduce Greenhouse Gas Emissions, DADI, March 2017	The Strategy To Minimise Energy Use & Reduce Greenhouse Gas Emissions contains a number of measures to consider energy efficiency during procurement of plant, and practical examples of when this has been done.	C	C	-	-



Table 4 - Environmental Assessment (Light Horse Business Centre Volume 1: Environmental Assessment Report)									
Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
400	5.10.4	All greenhouse gas producing equipment will be maintained to retain high levels of energy efficiency.	Document Review	MPC Maintenance Reports dated: 3/5/2016 1/8/2016 21/10/2016 24/1/2017  Nine MPC Maintenance Shift Reports for 2016 and 2017	Review of maintenance records indicates plant and equipment on the site are maintained regularly.	C	C	-	-
401	5.11.1	LHBC will implement health, safety and risk management plans for the Project.	Document Review	DADI Workplace Health and Safety Booklet	The auditor has sighted the DADI Workplace Health and Safety Booklet for the site.	C	C	-	-
402	5.12.1	Where possible LHBC will locally source staff.	Interviews with staff, Auditee	-	DADI advertises vacancies on job boards and the like and engages employees on a range of criteria. A high proportion of staff are local staff.	C	C	-	-
403	5.12.2	Preparation of Local Communication Strategy for the dissemination of information regarding the Project to the local community.	Document Review	Ongoing Community Consultation and Communications Strategy For The Next Generation, Eastern Creek	The auditor has reviewed the document titled "Ongoing Community Consultation and Communications Strategy For The Next Generation, Eastern Creek" and notes that this relates to the proposed waste to energy project rather than the existing site activities.	C	NT	-	-

**Notes**  
 1 - This is a safety risk not an environmental risk hence this risk rating represents a departure from the methodology presented in the IEA Guideline.

Table 6 - Management Plans and Procedures



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
<b>Compliance Assessment Criteria:</b> <b>C - Compliant</b> <b>NC - Non-Compliant</b> <b>ANC - Administrative non-compliance</b> <b>NV - Not Verified</b> <b>NT - Not Triggered</b> <b>OBS - Observation</b> <b>NOTED</b>									
<b>Applicable Plans:</b> Aboriginal Heritage Management Plan Air Quality, Odour and Greenhouse Gas Management Plan Conveyor and Chute System Maintenance and Management Plan Landscape and Vegetation Management Plan Soil, Water and Leachate Management Plan Interim Stormwater Management Plan for the pre-sort enclosure Emergency Management Manual Rehabilitation and Closure Plan Spoil Management Plan Waste Monitoring Program									
<b>ABORIGINAL HERITAGE MANAGEMENT PLAN. Prepared by DADI, dated 16th March 2017</b>									
404	-	<p>In the event that previously unrecorded relics (Indigenous heritage items) are encountered during any future construction on site, works will cease immediately at that location and the NSW Heritage Office will be notified and advice sought as to the appropriate course of action. The Proponent will be guided on the salvage and long term management of salvaged object.</p> <p>The relevant areas of sensitivity are as follows (refer Figure 5 below):</p> <ul style="list-style-type: none"><li>• Zone 3 is the quarry pit and the MPC area – highly disturbed with no aboriginal heritage concerns.</li><li>• Zone 2 is the area where cut and fill operations took place – where no further archaeological investigation are warranted.</li><li>• Zone 1 is the Conservation Areas shown on the Plan and are deemed to be of 'high sensitivity'.</li></ul>	Document review, site inspection.	Review of site maps and plans, review of employee induction.	<p>No intrusive works are understood to have been undertaken in Zone 1 during the audit period, hence the operation is understood to be substantially compliant with the management plan.</p> <p>Adequate controls (stop work, undertake further assessment) are believed to be in place to manage risks to aboriginal sites from intrusive works in Zone 1.</p>	C	C	-	-
405	Section 3	All personnel and contractors at the DADI Waste Facility Site will undergo Cultural Induction Training before being allowed to commence work on site.	Document review	Employee site induction manual	The auditor has sighted a sample of the employee site induction manual with a sign off page.	C	C	-	-
406	Section 4	<p>Monitoring of high archaeological sensitivity areas is undertaken by DADI personnel in accordance with the Cultural Monitoring Program and individual Management plans and programs prepared in accordance with the Development Consent Conditions.</p> <p>Monthly photo audits are undertaken to ensure the integrity of areas of high archaeological sensitivity is maintained.</p>	Document review	Conservation Area Monthly Photo Audit dated: 14/3/2016 16/5/2016 18/10/2016	The auditor has reviewed a sample of photo monitoring reports from photographic monitoring undertaken within the conservation area in which the auditor understands areas of heritage significance are located.	C	C	-	-
Review of the adequacy of the AHMP, consistent with the requirements of consent 06_0139 Schedule 5, Condition 2		<p>management plan requirements:</p> <p>a) baseline data - Included within plan? - YES</p> <p>b) a description of:</p> <ul style="list-style-type: none"><li>· the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li><li>· any relevant limits or performance measures/criteria;</li><li>· the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;</li></ul> <p>Included within plan? - NO - the plan is silent on performance indicators.</p> <p>c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; - Included within plan? - YES</p> <p>d) a program to monitor and report on the:</p> <ul style="list-style-type: none"><li>· impacts and environmental performance of the project;</li><li>· effectiveness of any management measures (see c above);</li></ul> <p>Included within plan? - YES</p> <p>e) a contingency plan to manage any unpredicted impacts and their consequences; Included within plan? - YES</p> <p>f) a program to investigate and implement ways to improve the environmental performance of the project over time; Included within plan? - YES</p> <p>g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"><li>· incidents;</li><li>· complaints;</li><li>· non-compliances with statutory requirements; and</li><li>· exceedances of the impact assessment criteria and/or performance criteria; and</li></ul> <p>Included within plan? - YES</p> <p>h) a protocol for periodic review of the plan. Included within plan? - YES</p> <p>Adequacy of the Plan - the Auditor is of the opinion that the major components of the AHMP are present (notwithstanding comments made above)</p>							Confirm the ABORIGINAL HERITAGE MANAGEMENT PLAN contains all required components, including performance indicators.

Table 6 - Management Plans and Procedures



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
Air Quality, Odour and Greenhouse Gas Management Plan. Prepared by DADI, dated 16th March 2017									
407	2.2	An anemometer shall be maintained on the Site at all times and shall be installed and operated in accordance with its manufacturer's instructions.  The anemometer shall be maintained and checked regularly to ensure it is in good working order during the hours of operation of the Site.	Visual inspection. Document review.	Invoices for the maintenance of the weather station (Davcol Electrical Services, 31 May 2015, 1 July 2014, 31 July 2013, 28 May 2012)	A weather station is present on the site which incorporates an anemometer. The auditor has sighted invoices for the maintenance of the weather system.	C	C	-	-
408	2.2	The anemometer shall be linked to a device that issues a warning and which activates mist sprays along the perimeter escarpment of the Pit Area in the north and north east of the site and appropriate sprays in areas where processing is carried out in the open air when wind speeds exceed 30 km/h and it is not raining.	Document review	Letter from Davcol electrical and plumbing to DADI dated 4.9.17	The contractor who installed and now maintains the Rain Bird anemometer system at the site confirms that the system meets this requirement in the previously referenced letter.	C	C	-	-
409	2.2	When (a) the wind speed is measured above 30 kms per hour and, (b) when it is not raining Then in addition to those other mitigation measures referred to in this DMP those parts of the Site with a potential for dust generation must be continuously kept damp or high pressure mist sprays shall be activated along that perimeter of the Site Area opposite to the direction of wind or any area used for processing.  The installed suppression system shall be designed such that it will automatically operate to spray a sufficient amount of water to suppress dust and to prevent fugitive emissions whenever wind speeds as measured by the anemometer installed on the Site exceed 30 km/hour and when it is not raining, even when the Site is not open.	Document review	Letter from Davcol electrical and plumbing to DADI dated 4.9.17	The contractor who installed and now maintains the Rain Bird anemometer system at the site confirms that the system meets this requirement in the previously referenced letter.	C	C	-	-
410	2.2	Dust sprays and/or collection systems must be installed and operating on all crushing, grinding and screening equipment at the site	Visual inspection	-	Dust sprays were observed on screening plants conveyors.	C	C	-	-
411	2.2	Roads Paved site roads and unpaved areas will be watered regularly by the water cart spray to suppress dust. • Water sprays will be applied to all unsealed haul roads. • Sealed or gravel road must be constructed and maintained from the public roadway to the gatehouse (weighbridge) reception area of the landfill; • Dust suppression methods must be used as frequently as necessary for any unsealed on unvegetated areas at the landfill including the use of water sprays and water carts; and • A water cart must always be available on the site for the purpose of dust suppression. • The operator will also ensure that the access road is adequately drained or dewatered and ensure that the access roads, platforms and tipping face areas are maintained in a conditioned state to prevent or substantially reduce dust emissions. • Site roads and access roads must be maintained and be subjected to dust suppression measures in dry periods or in periods of windy conditions. • Paved site approach roads shall be swept once daily to remove dust and debris which may accumulate. • Litter pick up patrols will be mounted at least on alternate days or in the event of public complaints regarding the presence of litter. Litter will be picked up and taken to the site for disposal. • The operator shall make use of a water tanker with suitable spray bar to condition surfaces and roads to damp down dust and suppress emissions from the passage of vehicles.	Visual inspection. Document review	Water cart driver roster. Litter collection rosters.	The auditor observed a water cart wetting down roads on the site during the site audit. On the basis of a water cart driver roster sighted ERM understands the water cart is operated on the site. It appears that the driver typically finishes work at 3-4 pm, however it is noted that this time coincides with a reduction in deliveries / general vehicle movements around the site.  Litter was not observed to be an issue during the audit site visit and the auditor understands a checks for litter are undertaken and litter is picked up routinely.	C	C	-	
412	2.2	Site/Traffic Management  • Trucks must be immediately covered after being loaded with fines and aggregates and tailgates should be effectively sealed prior to leaving site. • All vehicles on site will be confined to designated roads with a speed limit of 15 km/h strictly enforced. • All trucks leaving the site should be required to pass through a truck wheel wash before returning to sealed roads within the Facility. • Pre-notification/booking of the arrival of dusty loads by the waste producer will be required by the operator and notices regarding procedures to be adopted will be displayed at prominent locations on the approaches to the tipping face and at the gatehouse/ weighbridge complex as well as distributed to all site staff and to waste transporters if required.. • Incoming Vehicles will be required to pass through an automated load wetting process before their loads are tipped.	Visual inspection	-	Trucks were observed to be covered on approach and when leaving site during the site audit. The auditee indicated those trucks that were not covered were empty.  Trucks were observed using the wheel wash during the site audit.  A check of the signage on approach to the site did not identify the presence of any advertised requirements around pre-notification for dusty loads. It is noted that not all signage on the site was checked for this requirement.	C	C	-	Confirm whether notices regarding procedures in respect to pre-notification / booking of the arrival of dusty loads are displayed at prominent locations on the approaches to the tipping face and at the gatehouse/ weighbridge complex.

## Table 6 - Management Plans and Procedures



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
413	2.2	Barriers <ul style="list-style-type: none"> <li>Impermeable landscaped earthen bunds will be constructed and maintained along the site boundary to protect neighbouring premises where appropriate.</li> <li>These walls or barriers would be supplemented by landscape plantings of mature screen trees probably cypresses Lleylandii (Leighton Green).</li> <li>These plantings would operate to screen and mask the operation from surrounding landholders. Tree heights of mature plants will rapidly achieve 5-6metres</li> </ul>	Visual inspection	-	Multi purpose amenity / dust / noise bunds were observed around the site. Bunds on entry to the site had been planted out with small conifers.	C	C	-	-
414	2.2	Stockpile management <ul style="list-style-type: none"> <li>Water sprays, or a suitable alternative dust control measure, will operate on any above ground uncovered or unsheltered stockpiles</li> <li>Wind erosion from stockpiles of fines (sands), with a higher potential for dust emissions, will be minimised by sheltering stockpiles using wind shields or breaks. During periods of high winds these stockpiles will be subject to water sprays to further reduce dust emissions.</li> <li>When critical wind speeds and directions are reached, fugitive dust emissions can be further reduced by increasing the frequency of water sprays.</li> <li>Wind speeds would be measured by an onsite anemometer.</li> <li>The number of work faces on stockpiles must be limited to one where practical.</li> <li>Wetting down of stockpiles should occur before transfer within or removal off site.</li> <li>Wetting down of raw materials stockpiles should occur before all crushing and screening.</li> </ul>	Visual inspection	-	Water sprays were observed to be operating on the finished product stockpiles during the site audit.	C	C	-	-
415	-	Tipping in Quarry <ul style="list-style-type: none"> <li>Prompt compaction of wastes will occur after dumping followed by covering with suitable material to sufficient depth.</li> <li>All earthmoving activities will occur within the reach of the water spray system.</li> <li>The working face shall be limited in dimension to prevent or substantially reduce nuisance from litter, dust and visual impact.</li> <li>The working area shall be large enough to facilitate manoeuvring and redistribution of material delivered by chute.</li> <li>The tipping face shall not be more than 500 mm in height and shall be oriented such that the placement of refuse is facilitated and such that compactors can move from the base upwards to facilitate maximum compaction of the wastes.</li> <li>Working at the tipping face will be controlled by tip face operative who will also direct traffic (if any) and ensure dust emissions are minimised.</li> <li>A water mist spray will be available at the tipping face to damp down any dusty wastes that are disposed. Drop heights should be minimised or dusty wastes rejected for disposal unless prior arrangement has been made.</li> <li>Operatives supervising receipt of materials will wear suitable face masks to prevent dust inhalation during the disposal of dusty wastes.</li> </ul>	Visual inspection	-	The auditor did not observe dust generated within the pit void during the site visit. The auditor suggests that the pit is likely to be a relatively minor contributor to overall dust generated on the site.	C	C	-	-
416	2.2	Drop Heights <ul style="list-style-type: none"> <li>Drop heights from conveyors should be kept to a minimum, and chutes socks and cowlings should be used.</li> <li>Fugitive dust emissions from the operation of the crusher will be achieved through a number of control measures such as windbreaks, water sprays, or hooding with fabric filters.</li> <li>Fine mist sprays will operate on all crushing and screening equipment to keep materials moist during processing.</li> <li>Fugitive dust emissions from the operation of the crusher will be reduced through a number of control measures such as windbreaks, water sprays, or hooding. The combination of using wind breaks and applying water sprays has been shown to result in an 80% reduction in dust emissions from crushing activities in mines.</li> <li>Dusty wastes must be wetted or arrive in sealed bags which will have been organised by prior arrangement.</li> <li>The dust suppression programme will be carried out in such a manner as to prevent excess water ponding or running over exposed surfaces. Vehicle speeds within the site must be restricted by the operator to 15 km/hour.</li> </ul>	Visual inspection	-	The auditor observed granular products being loaded onto a stockpile during the site visit. The stacker was observed to be positioned just above the stockpile and the material being transferred was observed to be damp.	C	C	-	-
417	3	Landfill Gas Emissions Quality and Distribution <p>In accordance with the Benchmark requirements (Benchmarks 15, 16, 17 and 18) annual gas monitoring survey of the landfilled surface will be conducted for LFG emissions.</p>	Document Review	Landfill gas monitoring reports prepared by Pacific Environment dated: December 2015 June 2016 March 2016 September 2016	The auditor has sighted quarterly landfill gas monitoring records for 2016.	C	C	-	

Table 6 - Management Plans and Procedures



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
418	4	<p>Greenhouse Gas Emissions</p> <p>The main control available in terms of minimising greenhouse gas emissions is to minimise the organic content of material to be landfilled and thereafter to reduce the rate of gas losses to the atmosphere by capping or the conversion of the gas to a less reactive form i.e. via combustion.</p>	Document review	Spotters training manual and training records. Waste Management Plan. Rejected loads register.	<p>The auditor has sighted documentary evidence which indicates the site actively attempts to identify and divert organic materials from the landfill.</p> <p>The auditor understands no other measures were implemented during the audit period as such measures were not triggered by gas concentrations measured.</p>	C	C	-	-
419	4.3	<p>Detection of Landfill Gas Emissions</p> <p>Quarterly surveys of landfill gas emissions will be undertaken in order to detect any future emissions through the cap and also at selected locations within the landfill i.e. at and beneath permanent structures (buildings) and enclosed spaces.</p>	Document Review	Landfill gas monitoring reports prepared by Pacific Environment dated: December 2015 June 2016 March 2016 September 2016	The auditor has sighted quarterly landfill gas monitoring records for 2016. The reports indicate monitoring of landfill gas emissions above the cap and within buildings was undertaken.	C	C	-	
420	4.4	<p>Remediating Landfill Gas</p> <p>Landfill gas emissions to the atmosphere are most likely to be associated with breaches in the cover caused by erosion or slippage on sloping surfaces, or by slumping or cavitation on platforms which cause stress cracks in the capping.</p> <p>Under such circumstances additional cover will be placed and compacted to rectify the problem and regular monitoring undertaken at an increased frequency to ensure that the gas hot spot has been rectified.</p> <p>Depending on the scale of the problem remediation may involve additional capping, the construction of a local cut-off on interceptor trench to enable venting to the atmosphere, installation of passive (or active) gas venting structures beneath buildings, installation of methane and carbon dioxide alarm systems, or the installation of positive gas abstraction in the area of the landfill considered to be causing the gas migration problem.</p>	-	-	Gas venting hot spots were not observed by those undertaking landfill gas monitoring during the audit period.	NT	NT	-	-
421	5	<p>Odour Management</p> <p>Odour management at the Site will be undertaken in the form of the following operational practices:-</p> <ul style="list-style-type: none"><li>• daily cover of the active tipping face;</li><li>• immediate burial of odorous or offensive wastes (normally an excluded waste);</li><li>• dust suppression by spraying and conditioning of wastes loads and haul roads;</li><li>• intermediate covering with 300 mm of VENM or other approved alternative cover;</li><li>• interim capping as agreed by OEI;</li><li>• banning of all waste burning on site;</li><li>• ensuring that emission controls on operational vehicles are acceptable;</li><li>• ensuring that waste loads are covered when vehicles enter the site;</li><li>• provision of vehicle wash down facilities;</li><li>• inspection of waste loads to ensure that unacceptable/excluded wastes do not enter the site, and that any special wastes have been pre-notified and that a trench has been prepared for disposal; and</li><li>• response to complaints from the general public regarding odour - resulting in attempts to identify the source of the odour and immediate removal, or undertaking air monitoring if the source of odour is not readily discernible.</li></ul>	Visual inspection. Document review	Landfilling plans. Spotters manuals and training documentation. Prohibitions on burning materials. Operation of a complaints line and review of complaints records.	<p>The auditor reviewed the odour management activities at the site and the findings and recommendations of two odour assessments (KMH, 2016 and 2017). The auditor is of the opinion that odour on the site is being adequately managed. It is nevertheless impossible to rule out the potential for temporary odour issues to have arisen during the audit timeframe.</p> <p>Odour complaints have been received during the audit timeframe, however the auditor notes that these complaints were not substantiated and there are a range of possible sources in the area.</p>	C	C	-	-


Table 6 - Management Plans and Procedures										
Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations	
422	-	Review of the adequacy of the Air Quality Landfill Gas and Odour Management Plan, consistent with the requirements of consent 06_0139 Schedule 5, Condition 2	<p>Management Plan Requirements:</p> <p>a) baseline data - Included within plan? - NO - the plan refers to data contained within the AQ assessment for the project.</p> <p>b) a description of:</p> <ul style="list-style-type: none"><li>· the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li><li>· any relevant limits or performance measures/criteria;</li><li>· the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;</li></ul> <p>Included within plan? - NO - the plan does not include performance indicators.</p> <p>c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; - Included within plan? - YES</p> <p>d) a program to monitor and report on the:</p> <ul style="list-style-type: none"><li>· impacts and environmental performance of the project;</li><li>· effectiveness of any management measures (see c above);</li></ul> <p>Included within plan? - YES</p> <p>e) a contingency plan to manage any unpredicted impacts and their consequences; Included within plan? - YES</p> <p>f) a program to investigate and implement ways to improve the environmental performance of the project over time; Included within plan? - YES</p> <p>g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"><li>· incidents;</li><li>· complaints;</li><li>· non-compliances with statutory requirements; and</li><li>· exceedances of the impact assessment criteria and/or performance criteria; and</li></ul> <p>Included within plan? - YES</p> <p>h) a protocol for periodic review of the plan. Included within plan? - YES</p> <p>Adequacy of the Plan - the Auditor is of the opinion that the Plan addresses all major content requirements, with the exception of those noted above. Review of the findings of the Odour Assessment (KMH, 2017), review of the complaints record and the auditors observations in respect to odour suggest that the odour is being adequately managed on the site. The Plan would benefit from the inclusion of mitigation measures for reducing or ameliorating greenhouse gas emissions with respect to emissions from plant and equipment.</p>							Confirm the Air Quality Odour and Greenhouse Gas Management Plan contains all required components.
Environmental Management Strategy (EMS) Conveyor and Chute Waste Handling Procedures, 16th March 2017.										
423	-	Asbestos wastes will be dealt with at the site through a series of measures as follows: Staff training in accordance with the Industry Asbestos Awareness Course and follow up course by trained in house staff or by external trainers to be undertaken on a regular basis at least once a year	Document Review	Sample of staff training records	The auditor sighted a sample of training records in respect to an external asbestos awareness training course to which a number of staff members had attended. A tool box talk on the safety handling of asbestos was also sighted. It is noted that the site induction includes a section on asbestos safety.	C	C	-		
424	-	Checking and inspection of incoming materials prior to stockpiling or processing to minimise the risk of asbestos wastes as follows: First inspection will be conducted when the load arrives at the facility, Second inspection at the checkpoint for traffic management and further load inspection, and Third inspection when materials are unloaded. Independent auditing of this system which minimises the risk of the presence of asbestos and other contaminants; Recording of non-complying generators illegally disposing of asbestos wastes; and Redirecting of asbestos wastes to other appropriate facilities or landfilled at the site in accordance with strict regulatory guidelines as set out below.	Visual inspection. Document review	Spotters Training Manual Asbestos Handling Flow Chart	The auditor observed the first and second waste checking process and reviewed guidance documents relevant to the management of asbestos on the site.	C	C	-		
Review of the adequacy of the Environmental Management Strategy (EMS) Conveyor and Chute Waste Handling Procedures, consistent with the requirements of consent 06_0139 Schedule 5, Condition 2			<p>Management Plan Requirements:</p> <p>a) baseline data - Included within plan? - NO, though such is not beloved to be required.</p> <p>b) a description of:</p> <ul style="list-style-type: none"><li>· the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li><li>· any relevant limits or performance measures/criteria;</li><li>· the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;</li></ul> <p>Included within plan? - NO</p> <p>c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; - Included within plan? - YES however these are not related back to the statutory requirements.</p> <p>d) a program to monitor and report on the:</p> <ul style="list-style-type: none"><li>· impacts and environmental performance of the project;</li><li>· effectiveness of any management measures (see c above);</li></ul> <p>Included within plan? - NO</p> <p>e) a contingency plan to manage any unpredicted impacts and their consequences; Included within plan? - PARTIAL COMPLIANCE</p> <p>f) a program to investigate and implement ways to improve the environmental performance of the project over time; Included within plan? - NO</p> <p>g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"><li>· incidents;</li><li>· complaints;</li><li>· non-compliances with statutory requirements; and</li><li>· exceedances of the impact assessment criteria and/or performance criteria; and</li></ul> <p>Included within plan? - NO</p> <p>h) a protocol for periodic review of the plan. Included within plan? - NO</p> <p>Adequacy of the Plan - The project consent requires the preparation of a 'Conveyor and Chute System Maintenance and Management Plan' the auditor notes that the document reviewed is a waste handling procedure not a management plan. The document does not address the requirements of the project consent 06_0139 Condition 7 (e).</p>							Prepare a Conveyor and Chute System Maintenance and Management Plan for the site.
Landscape and Vegetation Management Plan. Prepared by DADI November 2015										
425	-	Landscaping will be carried out to reduce the visual impacts of the Site, with all plantings referencing the Site's topography and using local species for rehabilitation / revegetation works, where possible. Exotic species will not be used.	Document review. Visual inspection	Dial a Dump Industries EMS Landscape and Vegetation Management Plan (June 2011)	It is noted that the amenity bunds on approach to the site have been vegetated with Leighton Green, an exotic conifer.	C	NC	LOW	Given the age of the conifer plantings removal and replacement of these trees is unlikely to provide any net environmental benefit. Consider revising the management plan such that it does not directly conflict with the existing landscaping. Ensure all future plantings are limited to native species.	

Table 6 - Management Plans and Procedures



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
426	-	All visual bunds or vegetation screens will utilise native species and weed control will be undertaken as necessary, in accordance with Abel.	Document review. Visual inspection	Visual Inspection  Weed Management Reporting (record of weed control activities) dated: - February 2017 - June 2016 - September 2016 - November 2016	It is noted that the amenity bunds on approach to the site have been vegetated with Leighton Green, an exotic conifer.	C	NC	LOW	As above
427	-	Ropes Creek tributary to have a 40m buffer zone from the top of the banks. Upper Angus Creek area to have a 10m buffer zone.	-	-	-	NOTED	NOTED	-	-
428	-	Weed Control and Vegetation Management will be carried out in accordance with the Schedule of Works in the Vegetation Management Plan (VMP).	Document review. Visual inspection	Weed Management Reporting (record of weed control activities) dated: - February 2017 - June 2016 - September 2016 - November 2016	The auditor understands weed control is undertaken in the conservation area. It is noted that the VMP contains a range of other requirements (eg checks for dumping, monitoring of transects etc), the timing of some of these actions falls outside of the audit timeframe and some date back to the construction phase. Hence there may be merit in critically reviewing the VMP to confirm ongoing compliance.	C	C	-	It is noted that the VMP contains a range of other requirements (eg checks for dumping, monitoring of transects etc), the timing of some of these actions falls outside of the audit timeframe and some date back to the construction phase. Hence there may be merit in critically reviewing the VMP to confirm ongoing compliance.
429	-	Weed Monitoring and reporting is to be carried out in accordance with the VMP in the areas and at the points specified using the forms and checklists in "Guidelines for Monitoring a Bushcare Project".	Document review.	Weed Management Reporting (record of weed control activities) dated: - February 2017 - June 2016 - September 2016 - November 2016	The auditor has not sighted any evidence that formal weed monitoring has been undertaken on the site, with the exception of periodic checks for weeds in the Landfill Supervisor Compliance WVI's - Daily, Fortnightly and Monthly Checks. This checking for the presence of weeds does not conform with the requirements of 'Guidelines for Monitoring a Bushcare Project'	C	NC	LOW	Refer to Audit Criteria #43
430	-	Requirement for Photo Monitoring:  'Monitoring shall take place at the places shown by the arrow markings on the Figures 13 and 14 above and within the VMP'	Document review.	Conservation Area Monthly Photo Audit dated: 14/3/2016 16/5/2016 18/10/2016	The auditor has reviewed a sample of photo monitoring reports from photographic monitoring undertaken within the conservation area in which the auditor understands areas of heritage significance are located.	C	C	-	-
431	-	Locked gates are to be installed at the perimeter of the Conservation Area to prevent public access.	Visual inspection	-	The auditor sighted locked gates at the conservation area.	C	C	-	-
432	-	Controlled access to be provided to the Conservation Area	Document review. Visual inspection	LHBC EMS Fencing and Security Plan (June 2011)  Unauthorised Entry/Security of the Site (Benchmark Technique Table BM 30)	The auditor sighted fencing around and locked gates at the conservation area. The auditor observed the presence of a bike trail within the conservation area, which indicates that historic and / or current unauthorised access to the conservation area has occurred.	C	OBS	-	Ensure access to the conservation area is controlled at all times, that any breaches of fencing are promptly repaired and that degradation caused by unauthorised access is rehabilitated.



Table 6 - Management Plans and Procedures



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
Review of the adequacy of the Landscape and Vegetation Management Plan, consistent with the requirements of consent 06_0139 Schedule 5, Condition 2			<p>Management Plan Requirements:</p> <p>a) baseline data - Included within plan? - YES</p> <p>b) a description of:</p> <ul style="list-style-type: none"><li>· the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li><li>· any relevant limits or performance measures/criteria;</li><li>· the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;</li></ul> <p>Included within plan? - YES</p> <p>c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; - Included within plan? - YES</p> <p>d) a program to monitor and report on the:</p> <ul style="list-style-type: none"><li>· impacts and environmental performance of the project;</li><li>· effectiveness of any management measures (see c above);</li></ul> <p>Included within plan? - NO - the plan is silent on oversight and monitoring of the efficacy of environmental management actions.</p> <p>e) a contingency plan to manage any unpredicted impacts and their consequences; Included within plan? - YES</p> <p>f) a program to investigate and implement ways to improve the environmental performance of the project over time; Included within plan? - YES</p> <p>g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"><li>- incidents;</li><li>· complaints;</li><li>· non-compliances with statutory requirements; and</li><li>· exceedances of the impact assessment criteria and/or performance criteria; and</li></ul> <p>Included within plan? - NO - a formal incident / non compliance notification and rectification procedure should be articulated in the Plan</p> <p>h) a protocol for periodic review of the plan. Included within plan? - YES</p> <p>Adequacy of the Plan - the Auditor is of the opinion that the Plan addresses all major content requirements, with the exception of those noted above.</p>						
Soil, Water and Leachate Management Plan. Prepared by DADI March 2017									
433	-	Undertake regular waste clearing and wetting down of exposed areas to limit sediment erosion and waste contamination of areas including but not limited to embankment and excavation areas, stockpile areas, site facility and storage areas and temporary work areas.	Visual inspection	-	<p>It wording of this statement is unclear however the intent appears to be the minimisation of erosion and export of sediment laded water. The auditor notes that erosion and sediment control on the site was observed to be generally adequate.</p> <p>Evidence of earthworks was observed on the western side of the amenity berm near the north western sediment basin. A sediment fence had been installed in this area but had subsequently fallen into disrepair.</p>	C	OBS	-	Ensure that where sediment and erosion controls are installed they are maintained for the duration of works, until the site has been rehabilitated.
434	-	Rehabilitate or revegetate areas where work is required, on completion or where prompt revegetation cannot be completed, implement erosion control measures including siltation fencing until revegetation is completed.	Visual inspection	-	<p>Evidence of earthworks was observed on the western side of the amenity berm near the north western sediment basin. A sediment fence had been installed in this area but had subsequently fallen into disrepair.</p>	C	NC	LOW	Rehabilitate disturbed areas as soon as possible following any soil disturbance.
435	-	Install silt fences and hay bales or sand bags where required downstream of disturbed areas, base of embankments, existing drainage lines, earthworks stockpiles otherwise implement measures in accordance with best practice.	Visual inspection	-	<p>Adequate sediment controls were observed in the vicinity of the Mod 5 earthworks.</p>	C	C	-	-
436	-	Limit flow velocities in drainage systems by implementing sediment and waste collection barriers in order to minimise possible scouring and to encourage precipitation of particulates in run off.	Visual inspection	-	<p>Rail ballast check dams were observed within the drainage line servicing the western sediment basins.</p>	C	C	-	-
437	-	Maintain vegetation in and adjacent to drainage lines.	Visual inspection	-	<p>Vegetation was observed along and within the drainage line servicing the western sediment basins.</p>	C	C	-	-
438	-	Remove silt build-up regularly, especially following large storm events.	Visual inspection	Fortnightly OSD Pit Inspections	<p>Silt build up was not observed within any sediment control device. Notwithstanding this, no evidence of systematic inspection and maintenance of construction phase sediment control infrastructure was observed. The auditor suggests that this inspection could be undertaken in conjunction with the 'Fortnightly OSD Pit Inspections'</p>	C	OBS	-	-
439	-	Provide an access track where practicable, along the toe of embankments to allow access for maintenance.	Visual inspection	-	<p>Access to sediment control infrastructure was available in active construction areas visited during the site audit.</p>	C	C	-	-




Table 6 - Management Plans and Procedures										
Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations	
444	-	Rehabilitation and Closure Plan			No requirements of the Plan are applicable at this time.	NT	NT			
Review of the adequacy of the Rehabilitation and Closure Plan, consistent with the requirements of consent 06_0139 Schedule 5, Condition 2			Management Plan Requirements: a) baseline data - Included within plan? - N/A b) a description of: · the relevant statutory requirements (including any relevant approval, licence or lease conditions); · any relevant limits or performance measures/criteria; · the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures; Included within plan? - YES c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; - Included within plan? - YES d) a program to monitor and report on the: · impacts and environmental performance of the project; · effectiveness of any management measures (see c above); Included within plan? - YES e) a contingency plan to manage any unpredicted impacts and their consequences ; Included within plan? - YES f) a program to investigate and implement ways to improve the environmental performance of the project over time; Included within plan? - YES g) a protocol for managing and reporting any: · incidents; · complaints; · non-compliances with statutory requirements; and · exceedances of the impact assessment criteria and/or performance criteria; and Included within plan? - YES h) a protocol for periodic review of the plan. Included within plan? - YES  Adequacy of the Plan - the Auditor is of the opinion that the Plan addresses all major content requirements.							
Spoil Management Plan, DADI September 2015										
445	10.3.4	Before bulk earthworks commence, the development area will be established by: - Removing all vegetation from the area to be excavated; - Installing silt fences and other erosion and sediment control measures;	Visual inspection	PSE Pre Development Reports (site inspection reports) dated: 6/5/2016 13/5/2016 20/5/2016 30/5/2016 3/6/2016 10/6/2016 17/6/2016 27/6/2016 25/7/2016	The auditor sighted sediment fencing around the eastern and southern sides of the work area during the audit site visit. Degraded sediment fencing was observed on the western side of the amenity berms. This fencing was tattered and would have provided no sediment retention functionality.  Review of PSE reports for the project indicate sediment control devices were generally maintained in a satisfactory fashion during the construction phase of the project.  No visible vegetation was observed in the work area.	C	C	-	Refer to Audit Criteria #434	
446	10.3.5	No mixing of overburden material with other material on site will occur due to the separation of the temporary stockpiles of surplus overburden material from other stockpiles on site.	Visual inspection	-	Visual inspection did not identify any stockpiles of waste in the vicinity of the work area.	C	C	-	-	
447	10.3.5	During the bulk earthworks phase, samples will be taken on a continuous monitoring basis to ensure the quality of the material is of a suitable nature for re-use on site.	Document review	PSE Pre Development Reports dated: 6/5/2016 13/5/2016 20/5/2016 30/5/2016 3/6/2016 10/6/2016 17/6/2016 27/6/2016 25/7/2016	Review of PSE reports for the project indicate samples were collected at the required frequencies.	C	C	-	-	
448	10.3.6	No overburden material will be stockpiled on the Site for longer than 12 weeks.	-	-	No information has been provided with which to verify this condition. The Mod 5 / presort enclosure earthworks are understood to be finished and no further compliance information is expected to be forthcoming.	C	NV	-	-	
449	10.4	The following erosion and sediment controls shall be implemented: [15 requirements listed]	Document review	PSE Pre Development Reports dated: 6/5/2016 13/5/2016 20/5/2016 30/5/2016 3/6/2016 10/6/2016 17/6/2016 27/6/2016 25/7/2016	Review of PSE reports for the project indicate sediment control devices were generally maintained in a satisfactory fashion during the construction phase of the project.	C	C	-	-	
Review of the adequacy of the Spoil Management Plan, consistent with the requirements of consent 06_0139 Schedule 5, Condition 2			The spoil management plan is considered generally fit for purpose. It is noted that the Mod 5 works the subject of the plan have now been cancelled and the plan is now redundant.							
Waste Monitoring Program, prepared by DADI dated 5 November 2015										

Table 6 - Management Plans and Procedures



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
450	2	Each vehicle entering the site will be logged into the site, the waste materials inventoried and recorded and then weighed in. The vehicles shall be weighed out over the (exit) weighbridge when exiting the Site.  The management reports shall detail the materials classified as non recyclable wastes which enter the site for the purposes of landfilling.	Document review	Records for incoming loads of waste soil for the sample date 30/5/2017, specifically Job Reports: Job # SCH009138 Job # SCH009135 Job # SCH009154 Job # SCH008583 Job # SCH009156  Waste classification reports prepared by Douglas Partners, EI Australia, Ground Technologies, Airsafe and Cardno for the above-listed jobs / loads.  Weighbridge dockets: GEN415732 GEN415454 GEN415394	The auditor understands that job numbers are assigned to every incoming load of waste delivered to site and that records are stored within an electronic tracking system. Weighbridge dockets capture entry and exit weights of vehicles and the job dockets refer to the waste type.	C	C	-	-
451	3.1	The utilisation of landfill space generally will be minimised by redirection of all re-usable, re-processable and recyclable wastes to the appropriate facility. In addition, all wastes arriving at the site will be screened at the weighbridge by the Site Owner staff, then at each unloading area and undergo a tertiary screening and inspection at the point of disposal.	Document review Visual inspection Interviews with staff	Genesis Spotters Training Manual	From review of policies, procedures and review of on site practices the auditor understands that the site operator seeks to maximise the proportion of waste recovered for sale, or re-directed for further processing / recycling.	C	C	-	-
452	3.1	Notices shall be posted to this effect and to specify the types and categories of wastes which will be accepted at the facility.	Visual inspection	-	The site entry sign states the types of waste permitted to be accepted at the facility.	C	C	-	-
453	4	The gate operative shall inspect appropriate documentation such as VENM certificates and waste classifications prepared in accordance with the NSW DECCW Environmental Guidelines: Assessment, Classification and Management of Liquid and Non Liquid Wastes, 1997.	Document review	Sample of waste classification reports for nominal date 30/5/2017.	The auditor understands waste classification documents are sent through ahead of time, and are subject to review by the facility operator.	C	C	-	-
454	5	A valid calibration record issued by the Department of Fair Trading certifying that the weighbridge has been properly calibrated will be available for inspection at all times in the site office.	Document review	Weighbridge calibration records dated 20 September 2016	The auditor has reviewed weighbridge calibration certificates and confirms that these calibration certificates demonstrate the site has a calibrate weighbridge.	C	C	-	-
455	6	All fuel and liquid storage areas planned to be built at the premises will provide for double skinned fuel tanks and comply with the requirements of SEPP 33. Routine inspection of all tanks and containment areas will be carried out on an monthly basis to ensure that their integrity is maintained.	Interviews with staff	-	The auditor understands that the fuel facility on the site is no longer in use and that no bulk fuel storage are present on the site.	C	C	-	-
456	7	All vehicles disposing of refuse on site must be advised via erection of signs that it is the vehicle operators' responsibility to ensure that any remnants of refuse or soil does not track out onto public roads.	Document review	Photographs of signage	ERM has sighted photographs of signage to the effect that "it is the vehicle operators' responsibility to ensure that any remnants of refuse or soil does not track out onto public roads".	C	C	-	-
457	8	Scavenging of wastes is prohibited at all times other than by the operator in the normal course of diverting, handling and redirecting wastes for recycling, reuse or reprocessing.  No other scavenging or totting will be allowed. Security fencing, gates and gatehouse facilities to prevent unauthorised entry are outlined in Section 6 of the EMS	Document review Visual inspection Interviews with staff	Invoices from Security contractor.	A lockable gate is located at the boundary of the site. The auditor has sighted four invoices issued by Nycon Security which indicate an ongoing security management system at the site.	C	C	-	-
458	9	The operator will establish and operate a facility for the segregation and salvage of goods and materials segregated at the MPC which may be resold or transported off site for resale.  The operator will maintain records of such quantities and sales to facilitate suitable record keeping of waste minimisation activities and to assist DECCW in their state-wide waste minimisation policy.	Visual inspection	-	The operator recovers and segregates a variety of materials for sale including recovered fines, aggregates, steel, non ferrous metals, timber products etc.	C	C	-	-
459	10	Recycling will include, but not be limited to, both hard fill materials (eg. sand soil concrete brick and tile) and also specified materials (eg. Metals (including steel), plastics, paper, timber, vegetation, carpet and mattresses etc).	-	-	-	NOTED	NOTED	-	-
460	11	Preliminary waste reception and visual screening (including questioning the waste transporter/ driver regarding load characteristics) will be undertaken at the weighbridge facility.  All incoming vehicles and wastes will be directed through the waste reception area and the loads inspected by the weighbridge (gatehouse) operator. Unacceptable (excluded) wastes shall be rejected, the DECCW shall be informed of the waste details, carrier and origin, and the carrier told to deliver the waste to an alternative appropriate licensed facility.	Document review Visual inspection	Rejected loads register	The auditor reviewed incoming loads and notes that incoming loads are inspected by the gatehouse operator using a CCTV system. The auditor sighted an excerpt of the rejected loads register (from the 2nd to the 8th of February 2016), which indicates a number of loads were rejected during this period.	C	C	-	-

Table 6 - Management Plans and Procedures



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
461	18	The MPC/WTF operator/licensee will ensure that only acceptable wastes are transported on to the site and for either landfilling or recycling purposes. Should the load contain chemicals or hazardous material the DECCW will be informed of the nature of the load and the carrier's details including registration of the vehicle and the proposed destination (if known).	Document review	Spotters training manual Rejected loads register	The auditee has been unable to provide any evidence of loads that have been reported to the EPA despite records of such loads being rejected on the 'rejected loads register'. Nevertheless the auditor notes that this is not currently a legal requirement, and the inclusion of this requirement in the management plan reflects a failure to update the plan.	C	ANC	ANC	-
462	22	Not more than 50 tonnes of Tyres may be stockpiled on site at any one time.		Volumetric surveys from June and December 2016.  Item 5 - Weigh bridge transaction - tyres	Review of volumetric surveys from June and December 2016 indicates no tyres were stockpiled at the time of the surveys.  Review of a document titled "Item 5 - Weigh bridge transaction - tyres" indicates 711 m3 of tyres were received on an undisclosed date. On the basis of bulk density information for tyres supplied by the Victorian EPA this equates to approximately 140 tonnes. It is unclear whether the tyres were stockpiled on site or immediately removed from site however it appears that this transaction poses a risk of non-conformance with the management plan.	C	OBS	-	Ensure vigilance is exercised in relation to large loads of tyres such that management plan requirements are met, including the limit of 50 tonnes of tyres stockpiled on site at any time.
463	23	Scheduled chemical wastes are controlled by the Scheduled Chemical Wastes Chemical Control Order, 2004 under the Environmentally Hazardous Chemicals Act, 1985. Scheduled Chemical Wastes will not be allowed into the MPC or the adjacent Landfill site.	Document review Visual inspection	Rejected loads register	The auditor reviewed incoming loads and notes that incoming loads are inspected by the gatehouse operator using a CCTV system. The auditor sighted an excerpt of the rejected loads register (from the 2nd to the 8th of February 2016), which indicates a number of loads were rejected during this period.  The auditor sighted signage upon entry to the site to the effect that prohibited chemical wastes are not permitted to be brought onto the site.	C	C	-	-
464	24	Drummed wastes must be in solid form. Any drummed waste that arrives at the waste delivery area in liquid form will be rejected and returned to the gatehouse/weighbridge.	Visual inspection	-	The auditor sighted signage upon entry to the site to the effect that liquid waste is not permitted to be brought onto the site.  The auditor notes that acceptance of liquid wastes at the MPC would likely give rise to management issues and there is consequently a meaningful disincentive to accept liquid waste.	C	C	-	-
465	26	Unacceptable wastes include any materials which do not fall into the above categories. These include but are not limited to:- • liquid wastes; • explosives; • poisons; • dangerous goods; • radioactive materials; • clinical, hospital and related wastes; • loose, uncovered (non-bonded) or friable asbestos; • scheduled pharmaceuticals; • scheduled wastes; and • putrescible wastes.  Screening of wastes at the gatehouse/weighbridge would normally eliminate these wastes from entry to the site.	Visual inspection	-	The auditor sighted signage upon entry to the site to the effect that liquid, medical, putrescible wastes and poisons are not permitted to be brought onto the site. The signage is silent on other types of prohibited wastes listed in the procedure.	C	OBS	-	It is recommended signage upon entry to the site / at the weighbridge is updated to include a full list of prohibited waste types.
466	27	Putrescible wastes include food or animal matter and unstable or untreated bio solids. This material will NOT be allowed into the MPC or the adjacent landfill.	Document review	Rejected loads register.	The auditor sighted signage upon entry to the site to the effect that putrescible wastes are not permitted to be brought onto the site.  Review of the rejected loads register does not identify any rejected putrescible materials. The auditee indicates putrescible materials are not received at the site as customers are aware it is a non putrescible landfill.	C	C	-	-
467	28	Vehicles attempting to leave unacceptable or excluded wastes at the MPC will be identified and directed to return to the weighbridge. The licensee (operator) will record details of the waste and carrier and communicate this information to the gatehouse and thence to the DECCW under the provisions of the POEO Act.	Document review	Rejected loads register. Correspondence between site operator and EPA	Review of the Rejected loads register indicates one load was rejected upon arrival at the MPC and was returned to the weighbridge.  The auditee has been unable to provide any evidence of loads that have been reported to the EPA.	C	NC	LOW	Refer to audit criteria #461.

Table 6 - Management Plans and Procedures



Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations	
468	29	Asbestos wastes will be dealt with at the site through a series of measures as follows: 1. Staff training in accordance with the Industry Asbestos Awareness Course and follow up course by trained in house staff or by external trainers to be undertaken on a regular basis at least once a year; 2. Checking and inspection of incoming materials prior to stockpiling or processing to minimise the risk of asbestos wastes as follows: 3. First inspection will be conducted when the load arrives at the facility 4. Independent auditing of this system which minimises the risk of the presence of asbestos and other contaminants; 5. Recording of non-complying generators illegally disposing of asbestos wastes; and 6. Redirecting of asbestos wastes to other appropriate facilities or landfilled at the site in accordance with strict regulatory guidelines as set out below.	Document review	Spotters training manual (December 2016) Staff training records Rejected loads register	The auditor notes that staff are trained in the process of asbestos identification, and the identification process has been recently improved by the implementation of asbestos detection equipment.  Review of the rejected loads register indicates asbestos waste is regularly identified and rejected from the facility.	C	C	-	-	
469	31, 32	Daily cover of 150 mm of VENM or other approved Cover Materials SHALL BE USED.  Cover materials must ordinarily comprise virgin excavated natural materials (VENM) or alternative daily cover (ADC) as defined in the Environmental Guidelines: Assessment, Classification, & Management of Liquid & Non- Liquid Wastes (DEC, 1999), or other materials (such as sealed container bases) approved by DEC.	Document review.	Letter from DADI to EPA dated 19 December 2012 re proposed license variations (p 2)  Assessment/Justification for a Trial Use of Concover (19 December 2012)	The auditee indicates that the landfill uses 'concover', a thin polymer coating used as an alternative to soil. This is applied in thin layers, hence the depths specified do not apply. Item B is not triggered during the audit period. Item C is compliant.	C	C	-	-	
470	35	The working face of the Landfill will be limited in dimension so far as possible to prevent, or substantially reduce, nuisance from litter, dust and any visual impact. All mixed loads of refuse liable to cause littering must be covered when they enter the site and may only be unloaded within the MPC building. Litter patrols will be undertaken both within the site and within a radius of 200 m of the site boundary. Any Litter found will be collected and appropriately disposed of.	Visual inspection	-	The auditor notes that the tipping face of the landfill inspected during the audit was not excessively large. Nevertheless significant areas of exposed waste were present, associated with the deposition of waste from the chute and the recovery and loading of this waste into trucks. Litter was not observed to be prevalent across the site.	C	C	-	-	
471	36	The operator ensures that vermin, birds and insects are controlled through maintaining the Landfill in a generally clean and tidy manner. Wastes are covered at the end of each daily shift, or in the case of odorous or offensive wastes immediately following disposal at the tipping face.  Wastes will be compacted continually during the days tipping operations to prevent access by vermin. If birds or rats are observed to be a problem then bird scares will be constructed and operated. If rats are observed rat bait will be laid as appropriate.	Visual inspection	-	The auditor understands waste is covered with approved alternative daily cover at the end of each day's operations. Birds were not observed within the landfill void during the site audit.	C	C	-	-	
472	36	Areas of standing water where mosquitoes may breed must be eliminated, unless the open areas of water constitutes an operational facility, such as a leachate collection facility, sediment basin, or clean water runoff holding facility.	Visual inspection	-	No areas of standing water (other than sediment basins) were observed on site.	C	C	-	-	
Review of the adequacy of the Waste Monitoring Program, consistent with the requirements of consent 06_0139 Schedule 5, Condition 2			The Auditor is of the opinion that the Waste Monitoring Program is adequate and fit for purpose.  The procedure states: "For logistic reasons co-disposal of asbestos materials if accepted with general refuse, will be practiced in preference to separate (monofill)/segregated asbestos burial at one (single) location in the Site". This statement appears to represent a deviation from previous practice at the site, whereby asbestos waste was buried in a designated area. It is recommended that the site operator undertake a review of this change to ensure that the new practice for asbestos disposal meets environmental regulatory obligations and complies with relevant health / hygiene legislation and standards.						It is recommended that the site operator undertake a review of the proposed policy of co-disposal of asbestos with other materials in the landfill to ensure that this practice meets environmental regulatory obligations and complies with relevant health / hygiene legislation and standards.	




Table 5 - EA Assessments and Reports									
									
Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations
<b>Compliance Assessment Criteria:</b> <b>C - Compliant</b> <b>NC - Non-Compliant</b> <b>ANC - Administrative non-compliance</b> <b>NV - Not Verified</b> <b>NT - Not Triggered</b> <b>OBS - Observation</b> <b>NOTED</b>									
BUSHFIRE HAZARD ASSESSMENT (HOLMES FIRE AND SAFETY, 31 July 2008)									
473	7 (a)	Asset Protection Zones should be implemented as specified within Section of the report	Document review Visual inspection.	EHS System Procedure - Minimising the Risk of Fire at the Premises and outlining the implementation and maintenance of Bushfire Asset Protection Zones on site	No evidence has been sighted that asset protection zones have been maintained on the site however the auditor notes that a procedure has been prepared that identifies the APZs and provides guidance on their maintenance. It is further noted that a contractor has been engaged to control weeds on the site.  A specific bushfire preparedness audit is outside the scope of this audit, and in the absence of documentary evidence that demonstrates the ongoing maintenance of asset protection zones the auditor has been unable to verify compliance with this condition.	C	NV	-	Refer to Audit Criteria #393
474	7 (b)	Asset Protection Zones are managed in accordance with the report.	Document review.	EHS System Procedure - Minimising the Risk of Fire at the Premises and outlining the implementation and maintenance of Bushfire Asset Protection Zones on site	No evidence has been sighted that asset protection zones have been maintained on the site however the auditor notes that a procedure has been prepared that identifies the APZs and provides guidance on their maintenance. It is further noted that a contractor has been engaged to control weeds on the site.  A specific bushfire preparedness audit is outside the scope of this audit, and in the absence of documentary evidence that demonstrates the ongoing maintenance of asset protection zones the auditor has been unable to verify compliance with this condition.	C	NV	-	Refer to Audit Criteria #393
475	7 (c)	The land owner / land manager is responsible for the implementation and ongoing management of all Asset Protection Zones	Document review.	EHS System Procedure - Minimising the Risk of Fire at the Premises and outlining the implementation and maintenance of Bushfire Asset Protection Zones on site	No evidence has been sighted that asset protection zones have been maintained on the site however the auditor notes that a procedure has been prepared that identifies the APZs and provides guidance on their maintenance. It is further noted that a contractor has been engaged to control weeds on the site.  A specific bushfire preparedness audit is outside the scope of this audit, and in the absence of documentary evidence that demonstrates the ongoing maintenance of asset protection zones the auditor has been unable to verify compliance with this condition.	C	NV	-	Refer to Audit Criteria #393
GROUNDWATER ASSESSMENT, LIGHT HORSE BUSINESS CENTRE, EASTERN CREEK, NSW, AUSTRALIA (ERM, 2008)									
476		The assessment contains no specific requirements or recommendations.	-	-		NOTED	NOTED	-	-
HERITAGE CONSERVATION STRATEGY FOR ABORIGINAL SITES IN THE LANDS OWNED BY VALAD FUNDS MANAGEMENT LTD AND SARGENTS P/L, IN THE EASTERN CREEK BUSINESS PARK (STAGE 3) PRECINCT PLAN BLACKTOWN, NSW. JULY 2015.									
477	3	A Plan of Management will be required to ensure the ongoing survival of high Aboriginal and archaeological (and flora and fauna) values in the designated conservation areas	-	-	Refer to the Aboriginal Heritage Management Plan	NOTED	NOTED	-	-




Table 5 - EA Assessments and Reports										
Audit Criteria #	Criteria Source	Audit Criteria	Approach	Documents Consulted	Auditors Observations / Notes	Auditee's Assertion	Auditor's Opinion	Risk level	Recommendations	
LIGHT HORSE BUSINESS CENTRE NOISE IMPACT ASSESSMENT (ERM, 2008)										
478	Section 8	Constructing impervious barriers at various positions around the facility, including 10 m high barriers to the north, north west, west and south of the main area of operations and retention of the existing earth mound to the north east of the quarry pit. These barriers are included in the noise modelling results presented in this report.	Visual inspection of amenity / noise berms		Amenity berms were sighted during the audit.	C	C	-	-	
479	Section 8	The following noise mitigation measures be included in a Noise Management Plan prepared for the site, potentially as part of the overall Waste Management Plan: • all on-site, fixed and mobile diesel powered plant, excluding road vehicles, are to be correctly fitted and maintained in accordance with the manufacturer's specifications. Particular attention is to be given to engine exhaust systems and the care and maintenance of mufflers and loaders during the last stages of this proposal where plant items are nearer to the surface	Document review.	Dial A Dump Industries EMS Noise Monitoring Program	The EMS Noise Monitoring Program (16 March 2017) contains the referenced mitigation measure.	C	C	-	-	
TRAFFIC IMPACT ASSESSMENT, PROPOSED RESOURCE RECOVERY AND LANDFILL FACILITIES QUARRY ROAD, EASTERN CREEK (TRANSPORT AND TRAFFIC PLANNING ASSOCIATES, 2008)										
480		Circulation Roadways: construct a sealed industrial standard road pavement (Council design standard)	-	-	Construction phase condition.	NT	NT	-	-	
481		Circulation Roadways: provide appropriate directional and regulatory signposting	Visual inspection.	-	The auditor sighted directional signage during the site inspection.	C	C	-	-	
482		Circulation Roadways: Provide appropriate lighting	Visual inspection.	-	The auditor sighted external lighting during the site inspection.	C	C	-	-	
483		Circulation Roadways: provide appropriate fencing and barriers to avoid any safety issues in relation to the quarry wall (vehicle and pedestrian)	Visual inspection.	-	The auditor sighted an earthen berm along the edge of the access roadway during the site inspection.	C	C	-	-	
484		Circulation Roadways: provide paved parking areas and linemarked parking areas	Visual inspection.	-	The auditor sighted an appropriately paved and marked parking area during the site inspection.	C	C	-	-	

Table 7 - Agency and Stakeholder Consultation						
Audit Criteria #	Audit Criteria / Agency Comment	Auditor's Observations / Notes	Auditee Assertion	Auditor's Conclusion	Risk level	Recommendations
Compliance Assessment Criteria: C - Compliant NC - Non-Compliant ANC - Administrative non-compliance NV - Not Verified NT - Not Triggered OBS - Observation NOTED						
EPA - Correspondence dated 17th of March 2017						
485	Recycling Facility (EPL 20121): During an inspection on 1 March 2017 asbestos sheeting was observed in the unprocessed stockpile in the Material Processing Centre (MPC). It was explained by the Licensee there is difficulty in determining what is and what isn't asbestos in incoming loads. Relates to conditions 01.1, L3.1 and L3.3.	<p>This matter relates to Clean Up Notice 1549945.</p> <p>While analytical results were not available for review the auditor has formed the view that the assertions of the NSW EPA in regards to this matter are sufficient to conclude that the incident occurred substantially as described. The auditor therefore takes the view that this incident represents a finding of non compliant with respect to EPL condition L3.1. The auditor has formed the view that while the procedures "to identify and prevent the acceptance of any waste not permitted by condition L3.1 to be accepted at the premises" were not effective in respect to the abovementioned incident, the procedures were nevertheless in place. The auditor therefore concludes the licensee is compliant with EPL condition L3.3.</p> <p>It is noted that the licensee has now purchased and is utilising a MicroPhazir asbestos identification tool to improve the waste classification process. The auditor suggests that going forward, this amendment to the procedure is likely to result in substantive improvement in respect to compliance with condition L3.1, and on this basis makes no recommendation in relation to this matter.</p>	The auditee refutes the incoming material contained asbestos and indicates that they have lodged legal proceedings in relation to obtaining analytical results in respect to the plaster cement sheeting testing.	No Finding	Not Assessed	Following the conclusion of legal proceedings in respect to this matter, or no later than the conclusion of the following IEA, update the compliance status of this audit criterion in line with the findings of the court, and re-publish the redacted report on the DADI website. This may be achieved via an addendum to the report.
486	Recycling Facility (EPL 20121): There have been two observations of dust emanating from within the MPC building and on a separate occasion dust migrating offsite from vehicle movements on internal roadways and from excavator use. Related to conditions 03.1 and 3.2.	<p>This matter relates to Official Caution 1536953, which was subsequently downgraded to an advisory letter.</p> <p>The auditor has reviewed the correspondence provided in relation to this matter and makes the following observations / conclusions:            - Dust is visible emanating from material handling activities in photographs provided by the NSW EPA;            - It is unclear whether visible dust is migrating beyond the site boundary;            - The site appeared to have relatively robust dust management practices in place during the audit site visit; and            - Complete elimination of dust generation is not always possible during handling of fine materials in outdoor environments.</p> <p>The auditor is therefore of the opinion that the auditee is substantially compliant with conditions 03.1 and 3.2. Nevertheless the visible dust evident in photographs provided by the EPA is undesirable, and should be the subject of additional controls / assessment such that dust emissions similar to those pictured do not occur in future.</p>	The auditee refutes that the matters raised in Official Caution 1536953 or the corresponding advisory letter constitute a non compliance with licence conditions.	C	-	Investigate dust controls in respect to outdoor material handling activities to confirm the adequacy of these controls. It is recommended enhanced dust control protocols are established and implemented during high dust risk conditions (hot, dry, windy weather) including but not limited to visual monitoring of dust generation and application of increased control measures where dust generation is observed.
487	Recycling Facility (EPL 20121): During a recent site inspection in March 2017 sediment and mud was being tracked on Honeycomb Drive. Dust was being created as trucks drove through the drying sediment. Related to conditions 03.1, 03.2 and 05.5.	The auditor has reviewed correspondence in relation to this matter and is of the opinion that the mud tracking referred to by the EPA is unassociated with the site in question. The auditor is of the opinion that this matter does not constitute non compliance with conditions 03.1, 03.2 and 05.5.	The auditee refutes that the mud in question derived from the site, rather it was from trucks utilising an adjacent nearby site.	C	-	-
488	Recycling Facility (EPL 20121): There have been observations of painted and engineered wood in the processed mulch stockpiles in the timber section of the recycling facility. Relating to clause 91 and 93 of the Protection of the Environment Operations Act 1997 (the "POEO Act").	The auditor sought to confirm the EPA's statement in relation to painted / engineered wood in the mulch stockpiles. The auditor closely inspected a number of mulch stockpiles and observed no evidence of such products in the mulch. The auditor has not therefore confirmed any breach of the of the POEO Act in relation to this matter.	The auditee refutes the EPA's assertion that painted and engineered wood is or was present in the processed mulch stockpiles.	C	-	-

Table 7 - Agency and Stakeholder Consultation

Audit Criteria #	Audit Criteria / Agency Comment	Auditor's Observations / Notes	Auditee Assertion	Auditor's Conclusion	Risk level	Recommendations
489	Recycling Facility (EPL 20121): Asbestos has been found in the unprocessed stockpile of brick and concrete wastes, this raises questions regarding the quality control and checking the loads as they arrive. This applies to all incoming building and demolition waste received at the site. Relates to conditions 01.1, L3.1 and L3.3.	<p>This matter relates to Show Cause Letter 1545864.</p> <p>The auditor makes the following observations / conclusions in relation to this matter:</p> <ul style="list-style-type: none"><li>- Asbestos containing material is understood to have been present in a stockpile of material destined for processing. A sample of this material was collected by the EPA and analysed for the presence of asbestos;</li><li>- The wording of EPL condition L3.1 is sufficiently broad such that it covers any potential avenue by which asbestos material could arrive at the site;</li><li>- Material containing asbestos is classifiable as Type 2 Special Waste;</li><li>- On the basis of the evidence available the auditor concludes that in all likelihood Type 2 Special Waste was received at the premises.</li></ul> <p>As above the licensee has procedures in place to identify and divert non licenced wastes from the site. Notwithstanding the abovementioned incident these procedures are believed to be generally effective. The auditor therefore believes an instance of non compliance has been demonstrated with respect to condition L3.1 though not in respect to condition L3.3.</p>	The auditee asserts that the operation is not in breach of conditions 01.1, L3.1 and L3.3.	No Finding	Not Assessed	Following the conclusion of legal proceedings in respect to this matter, or no later than the conclusion of the following IEA, update the compliance status of this audit criterion in line with the findings of the court, and re-publish the redacted report on the DADI website. This may be achieved via an addendum to the report.
490	Landfill Facility (EPL 13426) On two separate occasions asbestos contaminated soil has been observed being unloaded and compacted with no application of initial cover. Related to conditions 01.1 and 05.4	<p>This matter relates to Official caution 1542460 and Show Cause Letter 1545838.</p> <p>The auditee indicates that this matter is the subject of future legal proceedings. The auditor makes no finding in relation to this matter, and notes that the matter will be tested in court.</p>	The auditee asserts that it is not in breach of conditions 01.1 and 05.4	NV	-	It is recommended that in the course of the IEA due to be undertaken in 2019, the court's finding on this matter be reviewed. It is further recommended that the auditor make recommendations as he or she sees fit in relation to the finding.
491	Landfill Facility (EPL 13426): Warning signage in the asbestos disposal area has been absent on two separate occasions. Related to condition 01.1	As above				
492	Landfill Facility (EPL 13426): The water cart was not operating in the landfill void when asbestos soils were being unloaded. The asbestos contaminated soil was being unloaded then moved by front end loader and again moved by excavator to a stockpile. Related to condition 0 1.1	As above				
493	Landfill Facility (EPL 13426): Asbestos fragments have been observed on numerous occasions at the surface in the General Solid Waste ("GSW") disposal area. Related to condition 0 1.1 and 05.6	As above				
494	Landfill Facility (EPL 13426): There have been concerns relating to not applying end of day cover appropriately. Related to condition 01.1	The auditor has reviewed correspondence in relation to this matter and is of the opinion that on the balance of probabilities, the matter raised by the EPA is unlikely to constitute non compliance with the referenced licence condition.	The auditee asserts that it is not in breach of conditions 01.1	C	-	-
495	Landfill Facility (EPL 13426): EPA Officers have observed the suspected exhuming of waste from within the landfill and taking offsite. Related to conditions L3.3 and 05.3 and 05.9.	The auditor has reviewed correspondence and evidence in relation to this matter and is of the opinion that on the balance of probabilities, the matter raised by the EPA is unlikely to constitute non compliance with the referenced licence conditions. Refer also to comments made in relation to licence conditions L3.3 and 05.3 and 05.9 previously in this report.	The auditee asserts that it is not in breach of conditions L3.3 and 05.3 and 05.9.	C	-	-
496	Landfill Facility (EPL 13426): There have been complaints and concerns of odours on the premises migrating offsite. Related to condition L6.1	Review of the complaints register indicates two odour related complaints are recorded for the audit period: one on the 24/08/2016 and one on the 27/06/2015. The licensee undertook inspection for odours following each complaint but did not identify any odour issues. The auditor has been unable to establish the cause of the odour or determine whether it originated on the site. The auditor has minimal documentary evidence on which to base any conclusions in respect to these incidents. Based on the frequency of odour related complaints (two in two years) it can be concluded that odour is not a significant issue at this site.	The auditee asserts that it is not in breach of condition L6.1	NV	-	-
497	Landfill Facility (EPL 13426): During a recent site inspection in March 2017 sediment and mud was being tracked along Honeycomb Drive and creating dust clouds as trucks drove through the drying sediment. Related to condition 04.4.	Refer to audit criterion # 461				

Table 7 - Agency and Stakeholder Consultation						
Audit Criteria #	Audit Criteria / Agency Comment	Auditor's Observations / Notes	Auditee Assertion	Auditor's Conclusion	Risk level	Recommendations
498	Landfill Facility (EPL 13426): Suspected land application of wood waste (not meeting the mulch exemptions) was observed in a vacant block directly to the north of the recycling facility but outside the Licence boundary. Related to condition 05.9	The auditor has reviewed photographs of the wood material in question and did not observe any engineered or painted timber in the material. The auditor is not aware of any reason why the wood should not be classifiable as mulch under the mulch order.	The auditee asserts that it is not in breach of condition 05.9.	C	C	-
499	At the time of writing on 15 March 2017 the complaints register on the Genesis' website was last updated on 30 November 2016. On the register it is said to be updated monthly. The EPA is unaware of any recent complaints since the register was last updated.	The auditor notes that the register has since been updated.	NOTED	NOTED	-	-
DPI Water - Correspondence dated 21st of March 2017						
500	DPI Water advised the following in its submission on the revised Modification 3 proposal:  The management plans do not adequately address the rehabilitation of riparian land in accordance with Condition 60 of the project approval for MP06-0139 or Blacktown City Council's adopted SEPP 59 – Central Western Sydney Economic and Employment Area - Employment Lands Precinct Plan - Eastern Creek Precinct Plan (Stage 3).	-	NOTED	NOTED	-	It is recommended that DADI engages with NSW DPI Water to confirm the specific requirements of the department, and promptly revises the Landscape and Vegetation Management Plan to the satisfaction of the Department. It is recommended that all requirements contained within the plan are implemented in accordance with the timing indicated in the plan.
501	DPI Water advised the following in its submission on the revised Modification 3 proposal:  Condition 60 of the project approval requires the proponent to prepare and implement a Landscape and Vegetation Management Plan. The condition outlines that this plan must include detailed plans and procedures "to restore and maintain the waterways and riparian zones of the Ropes Creek tributary on the site"	-	NOTED	NOTED	-	As above.
502	DPI Water advised the following in its submission on the revised Modification 3 proposal:  The riparian widths should be in accordance with the adopted SEPP No. 59 Eastern Creek Precinct Plan (Stage 3).	The auditor notes that the riparian widths specified in the SEPP have been adopted by the Landscape and Vegetation Management Plan.	NOTED	NOTED	-	As above.
503	DPI Water advised the following in its submission on the revised Modification 3 proposal: The Environmental Management Strategy (EMS) and Landscape and Vegetation Management Plan reflect the SEPP No. 59 Eastern Creek Precinct Plan (Stage 3) controls: 5.6.1 (e) Development adjoining riparian corridors and trunk drainage channels (including detention basins and wetlands) must include a 10 m buffer zone consisting of a landscaped open space area that can tolerate occasional flooding; and 8.3.5 (b) When measured from the top of the bank on either side of the creek, development consent shall not be granted, except for development associated with the protection, enhancement and management of the riparian corridor, on land within the precinct that is within: · 40 m of Ropes Creek Tributary or · 10 m of Upper Angus Creek.	-	NOTED	NOTED	-	As above.
504	The EMS/VMP should include (but not be limited to) details on the following: o location of bed and banks and the footprint of the riparian zone to be established either side of the creek (measured from top of bank); o vegetation species composition, planting layout and densities; o seed/plant sources should be identified; o planting program, rehabilitation methods and staging and other revegetation techniques such as hydro seeding, direct seeding or assisted natural regeneration; o maintenance requirements; and o processes for monitoring and review including a method for performance evaluation.	-	NOTED	NOTED	-	As above.

Table 7 - Agency and Stakeholder Consultation						
Audit Criteria #	Audit Criteria / Agency Comment	Auditor's Observations / Notes	Auditee Assertion	Auditor's Conclusion	Risk level	Recommendations
505	DPI Water recommends the audit confirms whether: · a Landscape and Vegetation Management Plan has been prepared and implemented as required by Condition 60 of the consent; · The VMP includes details on the revegetation of the riparian zone; and · a 40 m wide riparian corridor (measured from the top of the bank) on either side of the Ropes Creek Tributary plus a 10 m buffer zone adjoining the riparian corridor has been established and revegetated at the site in accordance with SEPP No. 59 Eastern Creek Precinct Plan (Stage 3) controls 5.6.1 (e) and 8.3.5 (b). (Please refer to the relevant pages 1-8, 5-2,5-9, 5-11, 8-7 and 8-9 in the attached precinct plan.)	<p>The auditor can confirm that a Landscape and Vegetation Management Plan has been prepared as part of the site's Environmental Management Strategy (EMS).</p> <p>Review of the Management Plan indicates that the plan includes details on the revegetation of the riparian zone, however the details are relatively high level, and would benefit from specifications in regard to species, planting zones and planting densities.</p> <p>A 40 m wide riparian corridor is specified in the Plan.</p> <p>Review of invoices issued by a bush regeneration contractor suggests weed control activities are ongoing at the site. Revegetation activities do not appear to have been undertaken at the site.</p>	-	C	C	Revise the LVMP consistent with recommendations of DPI Water noting that a future road is proposed along and across Ropes Creek, commence progressive rehabilitation outside of the proposed road corridor.
506	DPI Water requests that the audit considers compliance with the relevant water licensing requirements for the landfill and recycling facility, specifically: · Assessment as to whether the project holds the required water entitlements and licences under the Water Management Act 2000 or Water Act 1912 (as applicable); · Compliance with the conditions of any water licences/approvals held · Identification of all water storages for the complex and identification of their licensing status being either exempt, subject to harvestable rights or regulated via a water access licence. · Quantification of both active and passive take by the project from each relevant water source and a comparison against previous predictions.	<p>The auditor has reviewed a document prepared by Consulting Earth Scientist titled Review of Water Licensing Requirements, Genesis Landfill and Recycling Facility, Eastern Creek, dated 7 April 2017.</p> <p>The report assesses the compliance status of the facility with relevant water licensing requirements. The report concludes the site is compliant with all water licencing requirements.</p>	C	C	-	-
507	The audit should check if clean water runoff from undisturbed areas is diverted away from the development to the downstream catchments. Note: the collection of dirty water in dams or sediment ponds for a water supply is exempt from requiring a licence under the Water Management (General Regulation) 2011. The collection of clean water in dams/sediment ponds to provide a water supply is not exempt and must be in accordance with an appropriate Water Access Licence and a nominated work.	<p>The auditor has reviewed the Site Surface Water Management Plan (Storm Consulting, 2008) and the Consolidated Stormwater Management Plan (Martens, 2011). Consistent with Figure 2-2: Catchment Areas of the Management Plan, clean water runoff on the site appears to generally drain away from undisturbed areas to the downstream catchments. The site is surrounded by amenity berms and rainfall on the inner side of these berms (predominantly dirty water) flows into the site and rain falling on the outside (predominantly clean water) flows away from the site. As a consequence of topography surface water in the southern laydown area flows into the site and thereafter into the sediment basins. Clean water flows captured by undisturbed areas to the west and south of this laydown area flow towards Ropes Creek. Rainfall and intercepted groundwater that flows down the pit walls is captured and thereafter used for dust suppression. It is reasonable to classify this as dirty water due to the highly disturbed nature of the pit walls, and the low degree of surface stabilisation.</p> <p>On-site sediment basins collect dirty water only.</p>	C	C	-	-
DP&E - Correspondence dated 25th of May 2017						
508	DP&E advised the audit shall consider the following: - management plan requirements.	Refer to the section titled 'Environmental Management Plans and Procedures'				
509	DP&E advised the audit shall consider the following: · the requirements of relevant regulatory agencies;	Refer to preceding parts of this Section.				
510	DP&E advised the audit shall consider the following: - the status of the operation;	The auditor has considered the status of the operation where applicable in respect to the audit criteria. The auditor notes in particular that the operation is now mature and environmental performance should reflect this.	NOTED	NOTED	-	-
511	DP&E advised the audit shall consider the following: - the key regulatory risks, including past or future risks;	Key regulatory risks have been considered by the auditee, these include non compliance with licence conditions in relation to dust, noise, odour and water quality. Review of compliance data for the applicable monitoring programs suggests these risks are being adequately managed.	NOTED	NOTED	-	-

Table 7 - Agency and Stakeholder Consultation						
Audit Criteria #	Audit Criteria / Agency Comment	Auditor's Observations / Notes	Auditee Assertion	Auditor's Conclusion	Risk level	Recommendations
512	DP&E advised the audit shall consider the following: - the predictions of environmental impact assessments;	<p>The project Environmental Assessment (Light Horse Business Centre Environmental Assessment Report, ERM 2008) concludes:</p> <p>The proposal is not expected to have an unacceptable impact on groundwater, surface water, air quality, odour, traffic, ecology, heritage and visual amenity. The project will also have positive impacts on Minchinbury and Eastern Creek and the wider Blacktown region in terms of socio-economic considerations.</p> <p>Consistent with the EA, the auditor has yet to identify any unacceptable impacts on the abovementioned environmental aspects. In addition noise modelling carried out as part of the EA is broadly validated by noise measurements made and an absence of noise complaints for the project (none received in the audit period).</p>	C	C	-	-
513	DP&E advised the audit shall consider the following: - the performance of the operation;	Review of overall audit findings suggests the operation has displayed an overall compliance rate of 75% over the audit period. A number of opportunities for improvement have been identified in both respect to weed and feral animal monitoring, hazardous materials management, the quality of environmental management plans and in respect to record keeping. These are discussed in the relevant sections of this report.	C	C	-	-
514	DP&E advised the audit shall consider the following: - results from previous audits;	Refer to the Section titled 'Criteria Derived From the Findings of Previous Audits'				
515	DP&E advised the audit shall consider the following: - any incidents or community complaints;	The auditor has reviewed the complaints log and notes that the only complaints recorded for the audit period are two odour related complaints. The complaint frequency does not support the view that the site is an offensive operation that provokes any significant public interest.	NOTED	NOTED	-	-
516	DP&E advised the audit shall consider the following: - feedback received from other regulatory agencies on the performance of the operation; and	Refer to preceding parts of this Section.				
517	DP&E advised the audit shall consider the following: - feedback received from the community / community consultative committee on the performance of the operation.	The auditee asserts that there has been no community feedback received during the audit period (other than two complaints - discussed above). The operation has a communication portal on the DADI website in which members of the community can provide feedback.	NT	NT	-	-

Table 8 - Criteria Derived from the Findings of Previous Audits						
Audit Criteria #	Previous Audit Recommendations	Auditor's Observations / Notes	Auditee Assertion	Auditor's Opinion	Risk level	Recommendations
Compliance Assessment Criteria: C - Compliant NC - Non-Compliant ANC - Administrative non-compliance NV - Not Verified NT - Not Triggered OBS - Observation NOTED						
Recommendations from the IEA dated August 2015, prepared by Cardno						
518	Undertake noise monitoring in accordance with regulatory requirements.	The auditor has sighted two noise assessments titled: Genesis Eastern Creek Compliance Noise Assessment (Pacific Environment, August 2015 and April 2016) and two assessments titled 'Noise Compliance Report: Genesis Eastern Creek Waste Management Facility' dated September 2016 and February 2017 and prepared by Consulting Earth Scientists. The auditor therefore concludes that noise monitoring has been undertaken at the required 6 monthly intervals through the audit period.	C	C	-	-
519	It is recommended that a procedure be established and documented for the immediate review of results and communication of the results to management followed by reporting to the EPA (if required).	The auditee was unable to produce a procedure prepared in response to this recommendation, however they indicated the Pollution Incident Response Plan performed this function. The auditor has reviewed the PIRP and notes that the PIRP defines pollution very narrowly and hence is not suitable for informing responses to sub-optimal monitoring results and the like.	C	NC	LOW	
520	Prepare, implement and maintain a procedure for evaluating the significance of environmental incidents and external reporting of such incidents. Clarify scenarios that would constitute material environmental harm and detail the reporting process that would be undertaken in response to such incidents.	The auditor has reviewed the Pollution Incident Response Plan and notes that it broadly contains the information required by this recommendation. It is noted that the plan could be improved by including actual scenarios, including sizes of spills that require reporting (for chemicals and hydrocarbons) or the volume and turbidity of sediment laden water that would constitute a pollution event.	C	OBS	-	
521	It is recommended that DADI keep records of all pre-emptive housekeeping activities that are undertaken in preparation for inclement weather events.	The auditee was unable to produce evidence of any activities undertaken in preparation for inclement weather events to minimise the likelihood of impacts upon the environment (noting that no actual impact is believed to have occurred). In particular elevated turbidity results for the on site sediment basins and review of weather data suggest a high rainfall event occurred in Q3 2015 (although water did not overflow the sediment basins). Records of actions taken (if any) in preparation for or in response to this rainfall event (e.g. flocculation and dewatering of the basins) were not able to be produced.	C	NC	LOW	
522	Undertake periodic Quality Assurance / Quality Control testing of the finished granular products to verify that fugitive asbestos is not present within the product(s).	The auditor has sighted a sample of four finished product QA testing reports dated 11/05/2016, 26/5/2016, 21/7/2016 (all for aggregate) and 21/7/2016 (aggregate and brick).	C	C	-	-
523	Initiate a pests, vermin and feral animal control program. Implement a robust monitoring program to (a) characterise the populations of weeds and vermin / feral animals on the site (and adjacent sites) and (b) verify that the control measures implemented are being successful in controlling these populations.	The auditor has not observed any evidence that a robust and effective weed and feral animal monitoring and control programme has been prepared and implemented on the site.	C	NC	LOW	Refer to Audit Criteria #43
524	During the Environmental Audit scheduled for 2017, provide certification that the weather station is compliant with the applicable guideline.	Review of a letter from Davcol electrical and plumbing to DADI dated 4.9.17 (the contractor who installed and now maintains the Rain Bird anemometer system) indicates the system has been installed as in accordance with applicable standards.	C	C	-	-



Table 8 - Criteria Derived from the Findings of Previous Audits

Audit Criteria #	Previous Audit Recommendations	Auditor's Observations / Notes	Auditee Assertion	Auditor's Opinion	Risk level	Recommendations
525	Undertake landfill gas survey in accordance with regulatory requirements.	The auditor sighted a report titled Former Quarry Site at Old Walgrove Road – Summary Of September 2016 Landfill Gas Monitoring Dial A Dump Industries, prepared by Pacific Environment 5 October 2016.  The report summarises results from landfill gas (LFG) monitoring at the Site undertaken on 23 September 2016 for subsurface gas and gas accumulation monitoring, and surface gas monitoring.	C	C	-	-
526	It is recommended that specific chemical and hydrocarbon handling procedures are prepared to guide staff undertake tasks that involve these substances (e.g. servicing, refuelling of plant and equipment).	The auditor has reviewed a document titled ‘SAFE WORK METHOD STATEMENT (SWMS) – Chemicals / Diesels’ (undated). The auditor believes this document adequately addresses the requirements of this recommendation.	C	C	-	-
527	Formalise the existing energy usage reviews to ensure records are kept in fulfilment of this condition.	The site operator has prepared the following document to formalise energy use monitoring: 'Strategy to Minimise Energy Use & Reduce Greenhouse Gas Emissions'	C	C	-	-
528	It is recommended that written confirmation be obtained from suitably qualified persons to the effect that the weather system has been installed in accordance with the manufacturers instructions.	Review of a letter from Davcol electrical and plumbing to DADI dated 4.9.17 (the contractor who installed and now maintains the Rain Bird anemometer system) indicates the system has been installed as in accordance with applicable standards.	C	C	-	-
529	Engage suitably qualified and competent persons to undertake erosion monitoring across the site on a regular basis. Rectify any incidences of erosion promptly.	The auditor has not observed any evidence that a erosion monitoring program has been undertaken on the site.	C	NC	-	Implement an erosion monitoring program until it can be demonstrated that site surfaces are stabilised, stable and non polluting. In particular monitoring should be undertaken in the Mod 5 earthworks area where rill erosion has been observed.
530	Regularly monitor the security of the site and promptly repair damaged fences.	The weekly landfill managers checks include a checklist item for 'entry gates to the landfill are locked at all times outside of licensed operating hours.'. Noting that unauthorised access to the site has previously occurred through breached fencing to the west of the site, it is recommended security / fencing checks include all perimeter fencing, with a focus on areas that have been subject to unauthorised access in the past.	C	C	-	Noting that unauthorised access to the site has previously occurred through breached fencing to the west of the site, it is recommended security / fencing checks include all perimeter fencing, with a focus on areas that have been subject to unauthorised access in the past.
531	Ensure groundwater monitoring is undertaken at the required frequencies and interpretative reports are prepared in response to unusual results.	The auditor reviewed a report titled '2016 Groundwater Monitoring Report Genesis Landfill and Recycling Facility' prepared by Environ Consulting. Review of the report indicates groundwater monitoring has been undertaken at the required frequencies during the audit period.	C	C	-	-
532	Review the Landscape and Vegetation Management Plan to ensure consistency with other plans.	The 2015 revision of the LVMP is not inconsistent with the Amenity Berms Management Plan.	C	C	-	-
533	Prepare a surface water management infrastructure / pollution control infrastructure maintenance checklist to ensure all sumps, drains and bunds on site are checked and maintained regularly.	Stormwater inlets are checked as part of the 'Fortnightly OSD Pit Inspection' programme however it appears the actual sumps/basins and drains are not captured by these regular checks.	C	NC	LOW	Refer to Audit Criteria #51
534	Manage the drop height from the sock in accordance with the relevant management plan. Should the existing requirements be impractical, it is recommended DADI applies to the Department of Planning for the removal or modification of the condition. Any such change should be reflected in a revised version of the Management Plan.	A specific sock height has been removed from the most recent version of the management plan.	C	C	-	-

## Table 8 - Criteria Derived from the Findings of Previous Audits

Audit Criteria #	Previous Audit Recommendations	Auditor's Observations / Notes	Auditee Assertion	Auditor's Opinion	Risk level	Recommendations
535	It is recommended that a Bushfire Management Plan be prepared to manage fire risk on the site, and that this plan be prepared in consideration of the ecological values of bushland on and around the site. It is recommended the Bushfire Management Plan supersede the Bushfire Hazard Assessment for the purposes of any future audits	A Bushfire Management Plan has not been sighted by the auditor however it is noted a new EHS System Procedure - 'Minimising the Risk of Fire' (dated February 2016) has been prepared for the site.	C	OBS	-	Refer to Audit Criteria #46
536	Ensure wood waste stockpiles are kept below 2000 tonnes in accordance with requirements	Review of volumetric surveys from June and December 2016 indicates no wood waste stockpiles were over 2000t.	C	C	-	-
537	Undertake review of odour management plans to consider recommendations of the Field Ambient Odour Assessment and Review Study, The Odour Unit, August 2015.	The Dial a Dump Industries EMS Air Quality Odour and Greenhouse Gas Management Plan was revised on the 16th of March 2017.	C	C	-	-
538	Undertake reporting of groundwater monitoring results in accordance with the Groundwater Monitoring Plan, March 2012.	Groundwater monitoring results are published on the DADI website.	C	C	-	-
539	Ensure an inventory of emissions is developed for the project to monitor greenhouse gas emissions.	The auditor has reviewed a document titled 'Greenhouse Gases (GHG) Inventory prepared by Environ Consulting Services and dated 12 April , 2017. The auditor believes this document adequately addresses the requirements of this recommendation.	C	C	-	-
540	Prepare an environmental incident reporting procedure that includes a process for evaluating the severity of incidents, and a clear and transparent process for assessing whether external reporting of incidents is required, and how this would be undertaken.	The auditor has reviewed the Pollution Incident Response Plan and notes that it broadly contains the information required by this recommendation.	C	C	-	-
541	Prepare a procedure to prepare the site in the event of an impending or ongoing emergency (e.g. earthquake, storm, fire, flood) to prevent pollution.	The auditor has reviewed a document titled 'Genesis MPC Plant – Fire and Emergency Directions' that was provided by the auditee following the audit. The auditor believes this document broadly addresses the requirements of this recommendation. It is noted however that the plan is limited in its addressing of environmental emergencies and is limited to one part of the site. Hence there is merit in revising this plan to better mitigate the risks of emergency events on the environment.	C	C	-	-
542	Develop a procurement process to include consideration of energy efficient plant.	The auditor has reviewed the site operators "Strategy to Minimise Energy Use & Reduce Greenhouse Gas Emissions" and notes the strategy contains a number of measures to consider energy efficiency during procurement of plant, and practical examples of when this has been done.	C	C	-	-

## Table 8 - Criteria Derived from the Findings of Previous Audits

Audit Criteria #	Previous Audit Recommendations	Auditor's Observations / Notes	Auditee Assertion	Auditor's Opinion	Risk level	Recommendations
Recommendations from the supplementary audit dated 12th April 2016, prepared by Cardno						
543	Ensure all sediment control measures or devices are actively maintained	The auditor has reviewed a number of 'PSE reports' associated with the Mod 5 earthworks, and a number of 'OSD Pit Inlet' inspection reports. These reports indicate erosion and sediment control devices the subject of these inspections have been maintained appropriately. The auditor observed a tattered and destroyed sediment fence on the western side of the amenity berm in a portion of the Mod 5 earthworks area (an area of unstabilised soil), and on this basis cannot conclude that sediment control measures are adequately maintained on the site.	C	NC	LOW	-
544	Continue to manage wood waste stockpiles to keep size below specified limit	Review of volumetric surveys from June and December 2016 indicates no wood waste stockpiles were over 2000t.	C	C	-	-
545	Engineering or 'as built' plans should be provided to clarify the suitable construction of the leachate bunds.	The size of bunding on the site was formally assessed.	C	C	-	-
546	Engineering or 'as built' plans should be provided to clarify the suitable construction of the workshop bunds	The size of bunding on the site was formally assessed.	C	C	-	-
547	Future surface water records should include the sampler name and time sampling undertaken	Review of field sampling sheets indicates this information has been captured.	C	C	-	-
548	Columns for quantity of soil received, time of receipt and vehicle registration should be included in the register.	This recommendation relates to the incoming load product testing register. It is not believed that the register is a regulator requirement, nor is it known whether this register is still maintained.	-	-	-	-
549	Consider recommendations of the Field Ambient Odour Assessment and Review Study, The Odour Unit, August 2015 to update the AQOGGMP.	The Dial a Dump Industries EMS Air Quality Odour and Greenhouse Gas Management Plan was revised on the 16th of March 2017.	C	C	-	-
552	Future ground water and surface water records should include the sampler name and time sampling undertaken.	Review of field sampling sheets indicates this information has been captured.	C	C	-	-
553	Continue to sample surface water at the specified frequency	It is believed surface water has been sampled at the correct frequency during the audit timeframe.	C	C	-	-
554	Engineering or 'as built' plans should be provided to clarify the suitable construction of the workshop bunds.	The size of bunding on the site was formally assessed.	C	C	-	-
555	SWLMP and GMP should include reporting to EPA requirements for any exceedances.	The revised SWLMP and Groundwater Action Plan state "NSW EPA will be informed within 24 hours of the exceedance and within 14 days in writing"	C	C	-	-
556	Submit LEMP to EPA and Council for comment.	The auditee has not been able to provide evidence that the LEMP was submitted to the EPA and Council for comment.	C	NC	LOW	Submit all plans and procedures to Council and / or the EPA for review as required.

Table 8 - Criteria Derived from the Findings of Previous Audits

Audit Criteria #	Previous Audit Recommendations	Auditor's Observations / Notes	Auditee Assertion	Auditor's Opinion	Risk level	Recommendations
557	It is suggested that appendices are added to the work instruction with a map of stormwater devices and a checklist to record any issues and actions taken.	<p>The auditor understands this recommendation relates to the requirement from the Project EA Statement of Commitments: "OSD basin and Gross Pollutant Trap Cleaning Program to be implemented".</p> <p>It is noted that the 'Landfill Daily &amp; Fortnightly WVI Inspection' program has been implemented since the 2016 audit, however this programme does not include the sediment basins themselves. Benefit would therefore be had in broadening this inspection program. This matter is discussed elsewhere in this audit report.</p>	C	OBS	-	-
558	Develop an inventory of emissions to monitor greenhouse gas emissions of the project.	The auditor has reviewed a document titled 'Greenhouse Gases (GHG) Inventory prepared by Environ Consulting Services and dated 12 April , 2017. The auditor believes this document adequately addresses the requirements of this condition.	C	C	-	-
559	Records for annual retraining of staff should be kept	Staff training records have been sighted.	C	C	-	-
560	Prepare a groundwater monitoring report for submission to the EPA	The auditor understands this recommendation relates to the requirement from the Groundwater Monitoring Plan "detailed review of the results of the groundwater monitoring program will be provided annually". The auditor has reviewed an annual review of the groundwater data from 2016 prepared by ECS Consulting.	C	C	-	-
561	Suggest formalise monitoring done during regular weeding schedule	No evidence of formal weed monitoring has been sighted by the auditor.	C	NC	LOW	Refer to Audit Criteria #43
562	Suggest including more detail of the changes made in the plan.(PIRP)	A record of changes is not contained within the version of the Pollution Incident Response Management Plan provided for review (version 5).	C	ANC	ANC	-
563	The SWLMP should be updated when the revised Trade Waste agreement is received and include updated landfill data.	The SWLMP was revised March 2017	C	C	-	-
564	Review groundwater monitoring data and determine monitoring program improvements to include in the groundwater monitoring report	The auditor has reviewed an annual review of the groundwater data from 2016 prepared by ECS Consulting. The report states no changes to the groundwater monitoring program are warranted at this time.	C	C	-	-

Annex E

## List Of Documents Consulted

Document List
Volumetric surveys of landfill for license No. 20121 dated 2015 – 2017 with photograph displaying numbered stockpiles.
Site Surface Water Management Plan (Storm Consulting, November 2008)
Soil, Water and Leachate Management Plan (March 2017)
Specification for Leachate Management System Rev 3 (Douglas Partners, April 2012)
Surface Water Quality Monitoring for EPL 13426 and 20121 - data obtained from the DADI website.
Surface Water Quality Monitoring for EPL 13426 and 20121 - data obtained from the DADI website.
DADI rejected loads register
Timber Certification Reports January 2016 - Resource Recovery Order
Timber Sales Report February and January 2016 - Resource Recovery Exemption
Dial A Dump Industries EMS Waste Monitoring Program [Facility Procedures] Issue 2 (5 November 2015)
EHS Work Instruction: Asbestos Removal and Hazardous Substances (Revised 31 March 2015)
EHS Work Instruction: Procedure for Handling Asbestos Waste (Revised 31 March 2015)
Genesis Spotters Training Manual
Volumetric surveys of landfill for license No. 20121 dated 2015 – 2017
Genesis Eastern Creek Compliance Noise Assessment (Pacific Environment, 2015, 2016)
Dial A Dump Industries EMS Noise Monitoring Program (June 2011)
Genesis Eastern Creek Compliance Noise Assessments (Pacific Environment, 2015, 2016)
Employee clock on and off records
Dial a Dump Industries EMS Conveyor and Chute Waste Handling Procedures (March 2017)
MPC Chute & Transfer Report - scales time logs
A sample of the operators tickets to operate mobile plant.
EHS Procedures and Instructions including SWMS for operation of a range of mobile plant.
Staff training records (Asbestos awareness workshop - 27 Apr 2017) and general skills and training matrix
MPC Maintenance Shift Reports
Dust suppression - water cart operating schedule/operator work records
Air Quality Monitoring Reports prepared by Pacific Environment and Thompson Environmental Systems for the periods: - 2016 Q3 - 2016 Q2 - 2016 Q1 - 2015 Q4 - 2015 Q3
Site Emergency Management Manual (First Five Minutes, 6th June 2016)

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**Document List**

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Pests, Vermin Feral Animals and Declared Noxious Weeds Management Plan, Revised 16 March 2017

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Dial a Dump Industries Eastern Creek Bushland Restoration Works Program 2017 Financial Year (Earth Repair and Restoration)

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Weed Management Reporting (record of weed control activities) dated:

- February 2017
  - June 2016
  - September 2016
  - November 2016
- 

Tax Invoices for vermin control (four invoices - Rentokil)

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EHS System Procedure - 'Minimising the Risk of Fire' dated February 2016

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Invoices for the provision of security services to the site.

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Landfill Supervisor Compliance WVT's - Daily,  
Fortnightly and Monthly Checks

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Waste classification reports prepared by Douglas Partners, EI Australia, Ground Technologies, Airsafe and Cardno

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Fortnightly OSD Pit Inspection records dated:

- 5/12/2016
  - 1/3/2017
  - 27/3/2017
  - 8/5/2017
- 

Invoice from Davcol Pty Ltd for the "Service and cleaning of two storm water gross pollutant traps" including minor servicing every 3 months and one major service per year for the period 2015 - 2016.

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Photos of tyre storage area

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Landfill Daily, Fortnightly and Monthly WVI inspection records

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Dial a Dump Industries EMS Leachate Collection Conveyance and Management System (June 2011 and Revised 16 March 2017)

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Trade Waste Agreement 2016 - 2018

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Commercial and Industrial Customer Services Trade Waste Agreement/ Consent Number: 35580  
Routine Inspection 2016-09-27, 2017-05-19

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Asbestos Management Plan (DADI, March 2017)

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Appendix C: Martens Consulting Engineers (2011) Consolidated Stormwater Management Plan

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Weighbridge calibration records dated 20 September 2016

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Green Star - Construction & Demolition  
Waste Reporting Criteria  
Compliance Verification Summary  
"Waste Processing Facilities"

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Certification and Survey of Spill Containment Areas for Genesis Waste Facility Eastern Creek (Environ Consulting Services, 9 August 2016)

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## Document List

Surface water, groundwater and dust monitoring records for the audit period and corresponding consultants reports.

Field sampling notes dated:

August 2016

February 2016

February 2017

July 2015

May 2016

November 2015

November 2016

2015-16 and 2014/15 annual returns for EPL 20121 -

Dust Deposition Monitoring Records for EPL 20121 and 13426

Air Quality Monitoring Reports prepared by Pacific Environment and Thompson Environmental Systems for the periods:

- 2016 Q3

- 2016 Q2

- 2016 Q1

- 2015 Q4

- 2015 Q3

One week sample of weather data provided from onsite weather station

Genesis Complaints Register, provided by NSW EPA April 2017

KMH Odour Assessment dated 20 March 2017 and 2 May 2016

Past four years of annual returns

Genesis Incident Report Form and Register

Bankers Undertaking (15 May 2012)

Pollution Incident Response Management Plan MPC (DADI, JUNE 2016)

ConCover Trial Report (Environ, 2016)

Correspondence in regards to contributions plan.

LHBC EMS Fencing and Security Plan (2016)

Training Records - Asbestos Awareness

Training Records - Spotters Training Register-

Asbestos Management Plan (DADI, March 2017)

The Rehabilitation and Closure Plan

SWMS - Disposal of Asbestos Soil in Landfill

SWMS - Disposal of Wrapped Asbestos in Landfill

Genesis Waste Facility Filling Plan dated 2 May 2016 and revised 2 May 2017

Letter from the DP&E to DADI dated 23rd December 2011

## Document List

PSE Pre Development Reports dated:

6/5/2016  
13/5/2016  
20/5/2016  
30/5/2016  
3/6/2016  
10/6/2016  
17/6/2016  
27/6/2016  
25/7/2016

KMH Odour Assessment dated 20 March 2017 and 2 May 2016

GENESIS Electricity usage analysis for the period of January 2016 - April 2017

Strategy to Minimise Energy Use and Reduce Greenhouse Gas Emissions, DADI, March 2017

DP&E Notice of Determination (endorsement letter) dated 5th December 2011.

Landfill Rehabilitation and Closure Plan, prepared by Consulting Earth Scientists 23 February 2017

Spoil Management Plan dated September 2015

Security contractor invoices.

Emergency Evacuation Manual (First Five Minutes, 16th March 2016)

Letter prepared by Environ Consulting Services titled 'Request for confirmation of compliance with Approved Methods Publication- Genesis Landfill Facility'.

Groundwater Monitoring Plan, Genesis Facility Eastern Creek (IGGC, March 2012)

Letter of Approval from DoP (5 December 2011)

Letter from Davcol electrical and plumbing to DADI dated 4.9.17

Landscape and Vegetation Management Plan, Fencing and Security Management Plan-

EMS Incorporating (November 2011)

Dial a Dump Industries Aboriginal Heritage Management Plan (Revised 31 March 2015)

Dial a Dump Industries EMS Traffic and Transport Code of Conduct

Dial a Dump Industries EMS Green Waste Management Plan Issue 2.1 (5 November 2015)

Dial a Dump Industries EMS Air Quality Odour and Greenhouse Gas Management Plan (31 March 2015)

Dial a Dump Industries EMS Noise Monitoring Program (31 March 2015)

Vegetation Management Plan for LHBC (Abel Ecology, 22 October 2009)

Dial a Dump Industries EMS Amenity Berms Management Plan (July 2011)

Dial A Dump Industries EMS Fencing and Security Plan (5 November 2015)

Dial A Dump Industries EMS Pests, Vermin and Weeds Management Plan (June 2011 and Revised March 2015)

The Leachate Collection, Conveyance and Management System (Crespi Projects, 2011)

Dial a Dump Industries EMS Conveyor and Chute Waste Handling Procedures (Revised 31 March 2015)

2016 Annual Environment Review – Genesis Xero Waste Recycling & Landfilling Facility (DADI)

2015 Annual Environment Review – Genesis Xero Waste Recycling & Landfilling Facility (DADI)

Independent Environmental Audit (Cardno, 21 August 2015, 12th April 2016)

Cover Letter from DADI to Mr Mooney of the DP&E 'Genesis Facility (Eastern Creek) – Response to Independent Environmental Audit Recommendations' dated 9th May 2016

Document List
OSD Inlet Monitoring Programme records
DADI Oil Spill/Fuel/AD-Blue Clean up Procedure
Letter of conformance from Thomson Environmental Systems in respect to air monitoring equipment dated 27/7/17.
Landfill gas monitoring reports prepared by Pacific Environment dated: December 2015 June 2016 March 2016 September 2016
MPC Maintenance Reports dated: 3/5/2016 1/8/2016 21/10/2016 24/1/2017
Complaints Register for the site, updated August 2017
Letter from Robert Smith Electrical dated 29th March 2016
EHS System Procedure - Minimising the Risk of Fire at the Premises and outlining the implementation and maintenance of Bushfire Asset Protection Zones on site
"Fire Evacuation Diagrams"
Emergency Evacuation Manual (First Five Minutes, 16th March 2016)
'Geotechnical Quarry Slope Stability Assessment' report prepared by Jeffery and Katauskas Pty Ltd dated 17 March 2008
"Slip Reports" prepared by DADI dated 16/1/2017, 13/2/2017, 10/4/2017, 8/5/2017 and 13/6/2017.
Strategy to Minimise Energy Use and Reduce Greenhouse Gas Emissions, DADI, March 2017
Ongoing Community Consultation and Communications Strategy For The Next Generation, Eastern Creek
EHS System Procedure - Minimising the Risk of Fire at the Premises and outlining the implementation and maintenance of Bushfire Asset Protection Zones on site
Letter from DADI to EPA dated 19 December 2012 re proposed license variations (p 2)
Assessment/Justification for a Trial Use of Concover (19 December 2012)
Response to proposed remediation methodology required by Clean-Up Notice 15499455 (EPA to DADI dated 6 April 2017);
Response to proposed Remediation Methodology Required by Clean-Up Notice 15499455 (DADI to EPA dated 15 June 2017);
Official Caution Notice No. 1536953 – EPL No. 20121 – Breach of Licence Condition (EPA to DADI dated 12th February 2016);
Genesis Recycling Facility – Environmental Protection Licence 20121 – Official Caution (DADI to EPA dated 19th February 2016);
Dust and Litter Management – Environment Protection Licence No. 20121 (Advisory Letter EPA to DADI dated 16th March 2016);
Invitation to Show Cause (ref 1545864) (EPA to DADI dated 15th December 2016);

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**Document List**

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Genesis Waste Facility – EPL 20121. Response to Invitation to Show Cause – Suspected ACM in recycling premises (DADI to EPA dated 31st January 2017);

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Official Caution Failure to comply with Licence Condition O1.1 (EPA to DADI dated 7th September 2016);

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Genesis Waste Facility – EPL 13426 - Response to Invitation to Show Cause – Cover of Asbestos Containing Material (DADI to EPA dated 8 December 2016);

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Initiation to show cause (ref 1546716) (EPA to DADI dated 25 November 2016);

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Genesis Waste Facility – EPL 13426 – Response to Invitation to Show Cause – Waste to Queensland (QLD) (DADI to EPA dated 8th December 2016);

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Invitation to Show Cause (ref 1545838) (EPA to DADI dated 25 November 2016);

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Invitation to show cause (ref 1546749) (EPA to DADI dated 16 Dec 2016).

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## Annex F

# Register of Changes made to the IEA Report

## Register of Changes

Summary of changes made to the IEA report between issue to the client for review and finalisation.

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
#11  EPL 20121 L2.1	Non-Compliant	<p>Please see further documentation attached.</p> <p>The TSS result came about due to heavy rainfall disturbing the sediment in the dam. The annual report does not indicate that any discharge took place. On the basis of the above we ask that the finding of be</p>	<p>The criteria exceeded in this instance are described in the EPL as the 'North-west onsite surface water detention basin' and the 'South-west onsite surface water detention basin', rather than the 'Overflow (weir) from' [the respective basins]. Hence the limit is understood to apply in the absence of any discharge. No additional documentary information has been provided that would lead the auditor to revise the compliance finding for this audit criteria. If a revision to this conclusion is sought, it is recommend the auditee clarify this matter with the EPA.</p>	Non-Compliant
#12  EPL 20121 L2.2	Non-Compliant	<p>We note the auditor's comment and finding in L2.1 above which deals with the same issues regarding PH and TSS. We don't believe that this element requires a further conclusion of Non-compliance and risk.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	Refer to the response for #11, above.	Non-Compliant
#15  EPL 20121 L3.1	Non-Compliant	<p>We ask that the auditor note the following:</p> <p>a. Clean-Up Notice 1549945 has not yet been determined</p> <p>b. A Clean Up Notice is indicative only of a reasonable suspicion of a potential for pollution.</p>	<p>The original finding for this audit criterion was changed to 'No finding' upon the request of the auditee. It understood this matter is subject to pending legal proceedings which may resolve the matter definitively.</p>	No Finding (pending the outcome of legal

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
		<p>c. The words in L 3.1 of cause, permit or allow imply a state of knowledge i.e. One can only cause permit or allow if one knows that the state of facts exists. It does not cover the unknowing receipt of a material.</p> <p>d. Provided that the licence holder has</p> <p>not knowingly caused permitted or allowed and has otherwise followed all of its procedures then there has been no breach</p> <p>e. A Clean Up Notice does not of itself connote the element of deliberate action</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>For the avoidance of doubt the auditor makes no assertion as to the compliance status of the project with respect to this audit criterion.</p>	<p>proceedings)</p>
<p>#18</p> <p>EPL 20121</p> <p>L3.4</p>	<p>Non-Compliant</p>	<p>We refer to the auditor to his rating in L3.1 and note that the audit criteria is substantially the same and therefore make the same comments and requests.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>The original finding for this audit criterion was changed to 'No finding' upon the request of the auditee. It understood this matter is subject to pending legal proceedings which may resolve the matter definitively. For the avoidance of doubt the auditor makes no assertion as to the compliance status of the project with respect to this audit criterion.</p>	<p>No Finding (pending the outcome of legal proceedings)</p>
<p>#41</p> <p>EPL 20121</p> <p>O4.1</p>	<p>Non-Compliant</p>	<p>Please find attached additional documents which we do not believe were brought to the auditor's attention:</p> <ol style="list-style-type: none"> <li>1. Oil/Fuel/ Ad blue procedures; and</li> <li>2. Fire and Emergency Directions Plan.</li> </ol>	<p>The auditor has reviewed a document titled 'Genesis MPC Plant – Fire and Emergency Directions' that was provided by the auditee following the audit. The auditor believes this document broadly addresses the requirements of this recommendation. It is noted</p>	<p>Compliant</p>



Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
		On the basis of the above we ask that the finding of be amended to compliant.	<p>however that the plan is limited in its scope (being focussed primarily on health and safety matters).</p> <p>Hence there is merit in revising this plan to better mitigate the risks of emergency events on the environment.</p>	
#43  EPL 20121 O5.2a	Non-Compliant	<p>We note the auditor's recommendation regarding inclusions of additional measures regarding foxes and feral cats.</p> <p>The Licensee notes that the fox prints were identified outside of the auditable area and we can therefore not be NC with this condition.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>Fox prints were observed in a number of locations along the road leading to the sediment basins (Lot 2 DP 1145808) during this audit and two foxes were observed during the Cardno audit of 2015. It is therefore clear that an issue with feral animals exists on the site. The auditor maintains that the location is within the approved project boundary, however this is of little consequence given the mobility of this species.</p> <p>No evidence has been presented to indicate any control activities for vertebrate pests have ever been undertaken on the site. This is despite control and monitoring activities being a recommendation of the Cardno (2015) audit.</p>	Non-Compliant
#54  EPL 20121  O6.3	Non-Compliant	<p>Please find attached Tyre Waste Management Procedure and examples of the WVI.</p> <p>Our business policy is that we don't accept loads of tyres but only tyres that are incidental to or included in another load.</p>	The auditor has reviewed the document provided titled 'Tyre Waste Management Procedure (DADI, 2016)' and confirms the procedure contains measures to prevent stockpiles of tyres from catching on fire.	Compliant

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
# 69  EPL 20121 O7.2	Non-Compliant	<p>The Licensee notes that the requirement is that a bund must 110% of the largest vessel. The Licensee maintains that the bund observed was indeed of sufficient size to meet the 110% requirement (<i>please see photo of the label located on the bund identified</i>)</p> <p>The auditee acknowledges that there was a punctured bund as per the auditor's notes. It is the auditee's recollection that the self-bunded pallet was not in operational use at the time and the container that was on the self-bunded pallet was empty.</p> <p>The self-bunded pallet has been replaced and has a capacity of 110% of the largest drum. On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>ERM has elected to retain the finding of non compliant, the wording of the Auditor comment has however been changed to reflect the fact that the drums were empty</p> <p>Three drums labelled as containing hydrocarbons (but empty at the time of the audit) and two lead acid batteries were observed to be stored on a self bunded pallet near the entrance to the MPC. Whilst the capacity of the sump exceeded the volume of the largest container + 10%, the integrity of the bund had been compromised as it had been punctured by the fork of a forklift. Hence the bunded pallet in use did not satisfy containment requirements at the time of the audit.</p>	Non-Compliant
#84  EPL 20121 M4.2	Administrative Non-Compliant	<p>The weather station provides the measurements in both inches and mm.</p> <p>The incorrect measurement format was provided however this has now been amended and is attached.</p> <p>We further provide confirmation from Davcol noting that the measurements are taken in mm. On the basis of the above we ask that the finding be amended to compliant.</p>	ERM has reviewed a revised sample of rainfall data provided by the weather station, depicting rainfall in mm.	Compliant
#92  EPL 20121 M7.2	Non-Compliant	<p>The licensee does commission suitably qualified consultants to undertake these annual audits.</p> <p>We further highlight that the 2016 Odour assessment did identify odour omissions but noted that the odour was emanating from a putrescible waste site. As the auditor is aware the Licensee site is a non-putrescible waste site. It is out of the Licensee control to manage this through any design,</p>	ERM is of the belief that the shortcomings in the odour assessment (or 'odour audit') prepared by KMH exceed the threshold of an administrative non compliance. A failure to adequately assess the design, operation and odour management practices of the operation with the primary aim of identifying improvements, together with	Non-Compliant

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
		<p>operation or management plan.</p> <p>This is an administrative non-compliance and represents no risk and in any event the 2017 has ensured this aspect of its scope is clearly identified.</p>	<p>a failure to consult with the regulator during the design of the assessment are material deficiencies.</p> <p>ERM agrees that the risk of odour emissions from the site is relatively low, however this has little bearing on the compliance status with this condition of the licence.</p>	
<p># 100</p> <p>EPL 20121 R1.7</p>	Administrative Non-Compliant	<p>The Licensee contends that this is not a non-compliance.</p> <p>The EPA website states that...</p> <p><i>"the annual return must be signed by the licence holder or a person authorised to sign on the licence holder's behalf where the licence holder is a company".</i></p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>Condition R1.7 states:</p> <p>'Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:</p> <p>a) the licence holder; or</p> <p>b) by a person approved in writing by the EPA to sign on behalf of the licence holder.'</p> <p>ERM is satisfied that this matter is not necessarily a non compliance, however it is a matter that should be further investigated prior to the next IEA.</p>	Observation
<p>#122</p> <p>EPL 20121 E3.2</p>	Non-Compliant	<p>The Licensee notes that the exceedances observed by the auditor have already been explained as heavy rainfall - NOT a catastrophic event or significant storm. There was no evidence of any impact from the event on the environment and heavy storms occur regularly. The Licensee does monitor the dams weekly and more frequently during period of heavy rainfall.</p>	<p>ERM agrees that such an event has not occurred during the audit period and has changed the finding to Not Triggered. A detailed recommendation has been retained in relation to this condition, in relation to proactive sediment basin management, to ensure basins are prepared adequately for flooding or high rainfall events.</p>	Not Triggered

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
# 157  EPL 13426  O4.2	Non-Compliant	<p>See previous observation on this point under Licence 20121 and our response is same.</p> <p>Note that active and regular weed control activities are undertaken.</p> <p>See attached example of invoices from <i>Earth Repair &amp; Restoration</i> who visit the site at least once a week.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>ERM maintains that a number of elements of this condition have not been complied with. Specifically, the auditee has been unable to produce any evidence in response to sub-condition (a) in respect to measures to manage pests, vermin..., with the exception of insects and rodents, despite a known feral animal problem that has been raised by previous audits.</p> <p>Further, no evidence has been provided to demonstrate compliance with sub-condition (c) 'Perform ongoing monitoring of weed infestation on and adjoining the site'.</p>	Non-Compliant
# 169  EPL 13426  O5.10	Non-Compliant	<p>Noted and we confirm that this is being sent to the EPA.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p> <p>The auditor subsequently requested this finding be changed to ANC.</p>	<p>Actions taken outside of (after) the audit timeframe cannot be assessed as part of the audit and the finding should stand.</p> <p>The auditee requested this finding be changed to ANC. ERM notes that the filling plans for the previous two years have not been submitted to the EPA and the significance of the plan along with the passage of time is such that this cannot merely be considered a 'late submission' of little consequence. Consistent with the examples provided on page 7 of the IEA guideline, ERM considers this more than a mere ANC.</p>	Non-Compliant
# 190  EPL 13426	Non-Compliant	<p>Noted. The Licensee has amended the records and uploaded them to the DADI website.</p> <p>The auditor subsequently requested this finding be</p>	Response: Actions taken outside of (after) the audit timeframe cannot be assessed as part of the audit.	Non-Compliant

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
M2.1		changed to ANC.	The auditee requested this finding be changed to ANC. ERM notes that the data has never been uploaded on the DADI website and hence cannot be merely considered to be a 'late submission'. It is clear the auditee was unaware of the requirement to upload the data, rather than this being an administrative error.	

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
# 195  EPL 13426  M4.2	Administrative Non-Compliant	This Criteria relates to wind speed and direction and not land fall. Data has been provided in the correct format. On the basis of the above we ask that the finding of be amended to compliant.	ERM agrees with the auditee's statement that this condition does not apply to rainfall.	Compliant
#204  EPL 13426  M7.1	Non-Compliant	See comments and request made in 20121 in relation to odour. On the basis of the above we ask that the finding of be amended to compliant.	ERM is of the belief that the shortcomings in the odour assessment (or 'odour audit') prepared by KMH exceed the threshold of an administrative non compliance. A failure to adequately assess the design, operation and odour management practices of the operation with the primary aim of identifying improvements, together with a failure to consult with the regulator during the design of the assessment are material deficiencies. ERM agrees that the risk of odour emissions from the site is relatively low, however this has little bearing on the compliance status with this condition of the licence.	Non-Compliant
# 220  EPL 13426  R2.6	Non-Compliant	BH25 is a replacement monitoring well for BH10d which is monitoring point 21 on the EPL which is a monitoring point for ground water. Ammonia is measured in ground water but there is no threshold imposed in the EPL.	Review of data presented in the previously referenced report indicates ammonia was not measured at concentrations of over 15 mg/kg in monitoring point 25.	Not Triggered

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
# 284  Project Approval 06_0139  - 3,14	Non-Compliant	<p>See Licensees notes above in relation to control measures.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>The auditor is of the opinion that appropriate measures to manage some pests and declared noxious weeds are being implemented on the site. In particular extensive weed control has been undertaken by a contractor during the audit period and hence part of sub condition (a) is deemed compliant.</p> <p>While basic checks for the presence of weeds and vermin is included on the weekly site inspections this does not demonstrate adequately the control activities are effective nor does it constitute a formal weed monitoring program. Hence the project is deemed non compliant with respect to sub condition (c).</p> <p>No evidence has been presented that the current checks have been effective in quantifying the issue and informing management responses. Hence the project is deemed non compliant with sub condition (b).</p>	Non-Compliant
#286  06_0139-3,16	Non-Compliant	<p>Noted.</p> <p>The Emergency &amp; Fire Response Plan is endorsed by the NSW Fire Brigade in 2011. See attached correspondence confirming the same.</p> <p>The Licensee will be also be providing the documents to the NSW Fire Brigade for endorsement under the proposed Modification 7 as MOD 7 provides for reconfiguration of the site the Emergency Evacuation Manual will need to be amended.</p>	<p>The endorsement of the Emergency &amp; Fire Response Plan by the Fire Brigade is for an earlier (and completely different) version of the Plan dated 2011. The current version prepared by First Five Minutes, 2016 has not been endorsed by the fire brigade.</p>	Non-Compliant





Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
			<p>DP&amp;E and Council in March 2017. Evidence of compliance status with respect to the following requirements of the condition has not been provided by the auditee:</p> <p>This plan must:</p> <p>(a) Be prepared in consultation with DECCW, and Council</p> <p>b) Be prepared by a suitably qualified and experienced expert;</p> <p>c) Be submitted to the Director-General for approval within 3 years of commencement of operations.</p>	
# 365 06_0139-5,9	Non-Compliant	<p>Noted. These documents have now been uploaded. On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>While ERM contends that actions taken outside of (after) the audit timeframe cannot be assessed as part of the audit, we have revised our finding to ANC. The majority of the required documents were on the DADI website, and the issue predominantly related to the currency of the documents rather than their complete absence from the website.</p>	ANC
# 368  Environmental Assessment 5.1.2	Non-Compliant	<p>We submit that we are compliant with the Licence which overrides the EA. License 13426 condition M2.2 does not require TP, BOD and TN to be monitored and this should be noted as an observation.</p>	<p>The auditee contends that that are compliant with the Licence which overrides the requirements of the EA. ERM remains unconvinced that the EPL requirements technically override those of the EA however we note that the EPL conditions are more recent and are generally speaking, more thorough. In this instance it is</p>	Compliant

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
			therefore reasonable to adopt the EPL monitoring requirements in isolation.	

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
# 369  Environmental Assessment 5.1.3	Non-Compliant	<p>Noted. The current OSD Pit Inspection report currently does include sediment basins however these are referred to as OSD basins. See attached. The Licensee has noted the auditor's recommendations and will now include water level and turbidity in its reporting and annually assess the amount of sediment in the OSD. On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>The OSD Inlet Monitoring Programme triggers visual checks of the inlets to the drainage system located across the site but not the basins or OSD's themselves. Hence it does not capture the information required by the condition. The auditee indicates the monitoring program has been updated to address these comments.</p> <p>Actions taken outside of (after) the audit timeframe cannot be assessed as part of the audit.</p>	Non-Compliant
# 371  Environmental Assessment 5.1.5	Non-Compliant	<p>We refer the Auditor to our comments above with regard to the Bund.</p>	<p>Three 205l drums containing hydrocarbons and two lead acid batteries were observed to be stored on a self bunded pallet near the entrance to the MPC. Whilst the capacity of the sump exceeded the volume of the largest container + 10%, the integrity of the bund had been compromised as it had been punctured by the fork of a forklift. Hence the bunded pallet in use did not satisfy containment requirements at the time of the audit.</p>	Non-Compliant
# 375  Environmental Assessment 5.3.2	Non-Compliant	<p>Sydney Water undertake quarterly inspections on the Leachate Collection System including reviewing the system for any clogging.</p> <p>See attached.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>The auditee has provided ERM with eight Sydney water Routine Inspection forms for Trade Waste Agreement/Consent Number: 35580f. The auditee understands that by manner of deduction the auditee can confirm an absence of presence of clogging by comparing the information on these reports to other data collected from the leachate conveyance and monitoring system.</p>	Compliant

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
# 395 Environmental Assessment 5.8.4	Non-Compliant	<p>The Licensee does not agree with the auditor's submission that geotechnical investigations are required by a geotechnical engineer.</p> <p>The requirement does not state that each investigation needs to be undertaken by an 'expert' and in any event we attach our 2015 report by JK Geotechnics which indicates that the Licensee should continue to report.</p> <p>The Licensee did continue to monitor and report and no geotechnical issues were highlighted during those investigations which would have/or may have warranted an expert review.</p> <p>Further on the basis set out above we don't believe a finding of noncompliance and high risk is warranted.</p> <p>We would accept administrative noncompliance in relation to the 6 monthly reports and low risk.</p>	<p>The geotechnical report referenced was prepared prior to the audit period and the auditor understands no further geotechnical investigations have been undertaken during the audit period.</p> <p>The slip reports provided have not been undertaken at the required 6 monthly intervals through the audit period, and they do not consider the pit generally (only one part of the pit where a slip has been previously identified). The broad wording of the condition "Geotechnical inspections of the pit" suggests any inspections should consider the entirety of the pit. Moreover it is unclear whether these inspections have been undertaken by a geotechnical engineer, and hence whether they can be considered 'geotechnical inspections'.</p> <p>ERM are of the view that a land slip on the site could pose a real risk to human life and hence we feel this is more than an administrative non compliance.</p>	Non-Compliant
# 397 Environmental Assessment 5.10.1	Non-Compliant	<p>The Licensee wishes to confirm that the auditor was provided with a document by ECS dated 12 April, 2017 Titled Greenhouse gases Inventory? <i>(attached)</i>.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>The auditor has reviewed a document titled 'Greenhouse Gases (GHG) Inventory prepared by Environ Consulting Services and dated 12 April , 2017. The auditor believes this document adequately addresses the requirements of this condition.</p>	Compliant

<b>Audit Criteria Ref</b>	<b>Initial Audit Finding</b>	<b>Auditee Comment</b>	<b>ERM Comment</b>	<b>Final Audit Finding</b>
#398 Environmental Assessment 5.10.2	Non-Compliant	<p>The Licensee reiterates its comments and request in 5.10.1 above.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>The auditor has reviewed a document titled 'Greenhouse Gases (GHG) Inventory prepared by Environ Consulting Services and dated 12 April , 2017. The auditor believes this document adequately addresses the requirements of this condition.</p>	Compliant
# 403 Environmental Assessment 5.12.2	Non-Compliant	<p>The Licensee contends that this communication strategy is not triggered. The 'project' is generally in operation. All information can be found on the website. Anything that does generally affect the community, in whole or in part is communicated (quite properly) through the DA process which has already a community consultation requirement.</p> <p>We therefore request this finding to be amended to not triggered.</p>	<p>ERM has re-reviewed Section 17.5.3 of the Environmental Assessment and concurs with the auditee that this is a construction and pre-operational phase requirement. The finding has therefore been updated to not triggered.</p>	Not Triggered

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
# 425 Landscape and Vegetation Management Plan. Prepared by DADI November 2015	Non-Compliant	<p>The conifer's wasn't used for revegetation/rehab works nor do they form any part of the landscaping that was carried out subsequent to approval of the site. These trees have been located on the site since the site was signed off by the DPE and at that time no issue was raised.</p> <p>However we acknowledge the comments made by the auditor and will amend the plan accordingly.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	Review of publically available historic aerial photos of the site indicates no amenity berm conifer plantings were present along the southern boundary when the project was approved in 2009, and the majority were planted between 2013 and 2014. Hence these plantings cannot be considered as pre existing.	Non-Compliant
#426  Landscape and Vegetation Management Plan. Prepared by DADI November 2015	Non-Compliant	<p>See our comments above with regard to this issue.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	Review of publically available historic aerial photos of the site indicates no amenity berm conifer plantings were present along the southern boundary when the project was approved in 2009, and the majority were planted between 2013 and 2014. Hence these plantings cannot be considered as pre existing.	Non-Compliant
# 429  Landscape and Vegetation Management Plan. Prepared by DADI November 2015	Non-Compliant	<p>The Licensee relies on the prior response to this criteria.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	The auditor has not sighted any evidence that formal weed monitoring has been undertaken on the site, with the exception of periodic checks for weeds in the Landfill Supervisor Compliance WVT's - Daily, Fortnightly and Monthly Checks. This checking for the presence of weeds does not conform with the requirements of 'Guidelines for Monitoring a Bushcare Project'	Non-Compliant

<b>Audit Criteria Ref</b>	<b>Initial Audit Finding</b>	<b>Auditee Comment</b>	<b>ERM Comment</b>	<b>Final Audit Finding</b>
# 434  Soil, Water and Leachate Management Plan. Prepared by DADI March 2017	Non-Compliant	The Licensee notes that the auditor is making an observation. The Licensee wishes to bring to the auditor's attention that the berm and sediment fence are outside the auditable area.  On the basis of the above we ask that the finding of be amended to compliant.	ERM notes that the project approval lists the following lots as comprising the project: Lots 1, 2, 3 and 4 in DP 1145808, Eastern Creek in the Blacktown local government area. The disturbed area in which failed erosion and sediment controls were observed was situated on Lot 2 DP 1145808 and hence is believed to be within the auditable area.	Non-Compliant
# 442  Soil, Water and Leachate Management Plan. Prepared by DADI March 2017	Non-Compliant	The Licensee refers and reiterates it position and request at 5.1.3 above. On the basis of the above we ask that the finding of be amended to compliant.	No evidence has been provided to date that Sediment Basins / OSDs etc have been inspected on a regular basis or after rain. It is reiterated that the 'Fortnightly OSD Pit Inspection' reports do not present the findings of any inspection of the basins themselves, only the pits that lead water to the basins, which are scattered across the site.	Non-Compliant
# 456  Waste Monitoring Program, prepared by DADI dated 5 November 2015	Non-Compliant	Photographic Evidence attached. On the basis of the above we ask that the finding of be amended to compliant.	ERM has sighted photographs of signage to the effect that "it is the vehicle operators' responsibility to ensure that any remnants of refuse or soil does not track out onto public roads".	Compliant

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
<p># 461</p> <p>Waste Monitoring Program, prepared by DADI dated 5 November 2015</p>	Non-Compliant	<p>The Licensee note that was an exemption under wastelocate (until 30 September) that did not require reporting of rejected loads of asbestos soils so this was not recorded in the audit period.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p> <p>The auditee made a subsequent request that this finding be updated to ANC.</p>	<p>ERM is of the opinion that the existence of other legislative arrangements in relation to reporting of rejected loads does not absolve the auditee of having to carry out their operations in accordance with their internal management plans. If an activity is not required to be undertaken, the requirement to undertake that activity should be removed from the applicable management plan.</p> <p>ERM updated this finding to ANC on the basis that while the management plan required this action to be undertaken it was not a legal requirement, and the management plan had yet to be updated to reflect this.</p>	ANC
<p>#467</p> <p>Waste Monitoring Program, prepared by DADI dated 5 November 2015</p>	Non-Compliant	<p>The Licensee submits that it has no requirement to notify the EPA and as such this cannot be considered a non-conformance.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>ERM is of the opinion that the existence of other legislative arrangements in relation to reporting of rejected loads does not absolve the auditee of having to carry out their operations in accordance with their internal management plans. If an activity is not required to be undertaken, the requirement to undertake that activity should be removed from the applicable management plan.</p>	Non-Compliant
<p># 485</p> <p>Agency and Stakeholder Consultation - EPA - Correspondence</p>	Non-Compliant	<p>The Licensee refers to its previous response regarding comments on the Clean UP Notice 1549945.</p>	<p>The original finding for this audit criterion was changed to 'No finding' upon the request of the auditee. It understood this matter is subject to pending legal proceedings which may resolve the matter definitively.</p>	No Finding



Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
dated 17th of March 2017. Recommendations from the IEA dated August 2015, prepared by Cardno		On the basis of the above we ask that the finding of be amended to compliant.	For the avoidance of doubt the auditor makes no assertion as to the compliance status of the project with respect to this audit criterion.	

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
<p>#489</p> <p>Agency and Stakeholder Consultation - EPA - Correspondence dated 17th of March 2017 - Recommendations from the IEA dated August 2015, prepared by Cardno</p>	Non-Compliant	<p>The Licensee refers to its previous responses on this issue.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>The original finding for this audit criterion was changed to 'No finding' upon the request of the auditee. It understood this matter is subject to pending legal proceedings which may resolve the matter definitively. For the avoidance of doubt the auditor makes no assertion as to the compliance status of the project with respect to this audit criterion.</p>	No Finding
<p># 519</p> <p>Criteria Derived from the Findings of Previous Audits - Recommendations from the IEA dated August 2015, prepared by Cardno</p>	Non-Compliant	<p>The Licensee notes that this was a recommendation only.</p> <p>The Licensee will write a procedure as recommended.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	<p>The auditee notes that it has not complied with this recommendation and hence the recommendation of non compliant must stand. The scope of this audit includes the results of previous audits, as required by the IEA Guideline. Where an 'Action Plan' prepared under Section 6 of the IEA Guideline explicitly states that a recommendation would not be fulfilled, this would be considered reasonable grounds for removing a recommendation from the scope of a future audit.</p>	Non-Compliant

<b>Audit Criteria Ref</b>	<b>Initial Audit Finding</b>	<b>Auditee Comment</b>	<b>ERM Comment</b>	<b>Final Audit Finding</b>
# 521  Recommendations from the IEA dated August 2015, prepared by Cardno	Non-Compliant	<p>This is taken into account In MOD 7.</p> <p>A 40ml OSD will be constructed following receipt of approval.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	The auditee was unable to produce evidence of any activities undertaken in preparation for inclement weather events to ameliorate impacts upon the environment (noting that no actual impact is believed to have occurred). In particular elevated turbidity results for the on site sediment basins and review of weather data suggest a high rainfall event occurred in Q3 2015 (although water did not overflow the sediment basins). Records of actions taken (if any) in preparation for or in response to this rainfall event (e.g. flocculation and dewatering of the basins) were not able to be produced.	Non-Compliant
# 523  Recommendations from the IEA dated August 2015, prepared by Cardno	Non-Compliant	<p>As per previous comments re pest and vermin</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	As per previous commentary (eg 06_0139 – 3,14 ) the auditor has not observed any evidence that a robust and effective weed and feral animal monitoring and control programme has been prepared and implemented on the site. Specifically while control activities for weeds and some pests may have been carried out no evidence has been provided to demonstrate any monitoring has occurred during the audit period.	Non-Compliant
# 526  Recommendations from the IEA dated August 2015, prepared by Cardno	Non-Compliant	<p>See attached Hazardous Substance SWMS attached.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	The auditor has reviewed a document titled ‘Safe Work Method Statement (SWMS) – Chemicals / Diesels’ (undated). The auditor believes this document adequately addresses the requirements of this recommendation.	Compliant

<b>Audit Criteria Ref</b>	<b>Initial Audit Finding</b>	<b>Auditee Comment</b>	<b>ERM Comment</b>	<b>Final Audit Finding</b>
#529  Recommendations from the IEA dated August 2015, prepared by Cardno	Non-Compliant	<p>The Licensee notes that we do under take a weekly visual inspection.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	The auditor has reviewed site inspection records titled 'Fortnightly OSD Pit Inspections', 'MPC Compliance WVI' and 'C & S WVI's Daily, Weekly & Monthly'. No reference is made to erosion monitoring in any of these documents, nor in any other documentary evidence provided by the auditee.	Non-Compliant
#533  Recommendations from the IEA dated August 2015, prepared by Cardno	Non-Compliant	<p>The Licensee refers to is earlier response and request for amendment of finding. On the basis of the above we ask that the finding of be amended to compliant.</p>	Refer to previous comments regarding checking of the OSD basins. The Fortnightly OSD Pit Inspection' checklists do not present the findings of any inspection of the basins themselves, only the pits that lead water to the basins, which are scattered across the site.	Non-Compliant
#539  Recommendations from the IEA dated August 2015, prepared by Cardno	Non-Compliant	<p>The Licensee refers to is earlier response and request for amendment of finding.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	The auditor has reviewed a document titled 'Greenhouse Gases (GHG) Inventory prepared by Environ Consulting Services and dated 12 April , 2017. The auditor believes this document adequately addresses the requirements of this recommendation.	Compliant
#541  Recommendations from the IEA dated August 2015, prepared by Cardno	Non-Compliant	<p>The Licensee refers to is earlier response and request for amendment of finding.</p> <p>On the basis of the above we ask that the finding of be amended to compliant.</p>	The auditor has reviewed a document titled 'Genesis MPC Plant - Fire and Emergency Directions' that was provided by the auditee following the audit. The auditor believes this document broadly addresses the requirements of this recommendation.	Compliant

Audit Criteria Ref	Initial Audit Finding	Auditee Comment	ERM Comment	Final Audit Finding
			It is noted however that the plan is limited in its addressing of environmental emergencies and is limited to one part of the site. Hence there is merit in revising this plan to better mitigate the risks of emergency events on the environment.	
#543  Recommendations from the supplementary audit dated 12th April 2016, prepared by Cardno.	Non-Compliant	The Licensee notes that this is outside of the auditable area and we request this be removed from the audit criteria.	ERM notes that the project approval lists the following lots as comprising the project: Lots 1, 2, 3 and 4 in DP 1145808, Eastern Creek in the Blacktown local government area. The disturbed area in which failed erosion and sediment controls were observed was situated on Lot 2 DP 1145808 and hence is believed to be within the auditable area.	Non-Compliant
# 556  Recommendations from the supplementary audit dated 12th April 2016, prepared by Cardno.	Non-Compliant	The LEMP have been or are in the process of being provided to the EPA/DPE under the current Modification's 6 and 7. On the basis of the above we ask that the finding of be amended to compliant.	The auditee has not been able to provide evidence that the LEMP was submitted to the EPA and Council for comment.	Non-Compliant

<b>Audit Criteria Ref</b>	<b>Initial Audit Finding</b>	<b>Auditee Comment</b>	<b>ERM Comment</b>	<b>Final Audit Finding</b>
#558  Recommendations from the supplementary audit dated 12th April 2016, prepared by Cardno.	Non-Compliant	The Licensee refers to is earlier response and request for amendment of finding.	The auditor has reviewed a document titled 'Greenhouse Gases (GHG) Inventory prepared by Environ Consulting Services and dated 12 April , 2017. The auditor believes this document adequately addresses the requirements of this condition.	Compliant
# 561  Recommendations from the supplementary audit dated 12th April 2016, prepared by Cardno.	Non-Compliant	The Licensee refers to is earlier response and request for amendment of finding.  On the basis of the above we ask that the finding of be amended to compliant.	No evidence of weed monitoring has been provided by the auditee.	Non-Compliant
# 562  Recommendations from the supplementary audit dated 12th April 2016, prepared by Cardno.	Non-Compliant	The Licensee refers to is earlier response and request for amendment of finding.  On the basis of the above we ask that the finding of be amended to compliant.	A record of changes is not contained within the version of the Pollution Incident Response Management Plan provided for review (version 5). This is of negligible significance.	ANC