

2015

ANNUAL ENVIRONMENT REVIEW

**Genesis Xero Waste Recycling & Landfilling Facility
(Off Honeycomb Drive, Eastern Creek)**

Annual Environment Review prepared by:

Genesis Xero Waste Recycling & Landfill
Facility

Head Office Address:

84-88 Burrows Road, St Peters, NSW 2044

Proponent:

ThaQuarry Pty Ltd & ACN 114 842 453 Pty Ltd

In respect of:

Project Approval 06_0139 (as modified)

Project site & location:

Genesis Xero Waste Recycling and Landfill
Facility (off Honeycomb Drive, Eastern
Creek).

Lot & DP:

Lot1 in DP 1145808 and Lot 8 in DP 1200048

For and on behalf of ThaQuarry Pty Ltd and ACN 114 842 453 Pty Ltd, the undersigned certifies that the information contained within this report is neither false nor misleading.

First Draft

Approved:

Signed:

Date:

DRAFT

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Appendix A: Summary of 2015 Audit Findings

Report Scope

This consolidated Annual Environment Review (**AER**) has been prepared to satisfy the Project Approval Condition 3 (of Schedule 5) of MP 06_0139 (as modified) granted by the NSW Minister for Planning on 22 November 2009.

This will be the second Annual Environment Return prepared for the Genesis Facility.

Condition 3 of Schedule 5 states:

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:*
 - *the relevant statutory requirements, limits or performance measures/criteria;*
 - *the monitoring results of previous years; and*
 - *the relevant prediction in the EA;*
- 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.*

The following Environmental Plans and Strategies are currently addressed and accessible via the Genesis website at www.dadi.com.au/landfills

Fencing and Gates- Site security & Signage.
Amenity Berms
Operating Hours & Noise
Air Quality
Odour & Leachate Management Collection Treatment and Discharge
Stormwater Management
Landfill & Chute
Waste Management Procedures
Complaints
Compliance with Licence Conditions EPA

This review is conducted by reference to each subject matter and the criteria required by Planning Condition 3.

In summary, the following activities were approved under Part 3A of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*:

- capacity to receive up to two million tonnes of waste per annum, including inert and solid wastes from construction and demolition (C&D), commercial and industrial (C&I) waste streams complying with acceptable waste for general solid waste (non-putrescible) facilities, green waste clean ups, and metallurgical furnace slag and ash.
- on-site waste processing including sorting, screening, sieving, crushing, grinding, shredding and/or chipping, and composting of green waste;
- recycling of an estimated 76% of incoming waste

- 70-80% of incoming waste (1.4 to 1.6 million tonnes per annum (mtpa), based on maximum capacity intake) e.g. to produce road base, aggregate, landscaping soil, bedding sand, mulch, wood chip, green waste compost and asphalt derived products for land application;
- testing and on-site storage/stockpiling of finished products prior to resale from stockpiles, predominantly to the building, construction and landscaping sectors and potentially the domestic market;
- transport of an estimated 20-30% of incoming waste (0.4 to 0.6 mtpa, based on a maximum capacity intake) to the landfill proposed within the quarry void, comprising incoming materials which are unsuitable or uneconomical for recovery and recycling (for example contaminated soils, asbestos waste, metal gas cylinders, fire extinguishers and loads that cannot physically be sorted);
- quarantine and transfer of unacceptable wastes to an appropriate off-site facility for disposal;
- Segregated hardfill materials such as rock, sand soil, brick or concrete are also received at the Segregated Materials Area [SMA] within the Facility. These materials are crushed and screened for testing and sale for beneficial re-use;
- construction and operation of associated infrastructure, plant and equipment, including upgrade of the internal road network and reshaping of earthen amenity berms; and
- retention and conservation of a significant area on adjacent land beyond the north-west corner of the site, incorporating a remnant endangered ecological community (EEC) of Cumberland Plain Woodland (CPW).

Independent Environmental Audit

Schedule 5, Condition 7 of the Planning Approval Conditions is extracted below:

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:

- be conducted by a suitably qualified, experienced and independent team of experts (including an odour expert), whose appointment has been endorsed by the Director-General;*
 - include consultation with the relevant agencies;*
 - include a full odour audit of the project, taking into consideration the relevant technical guidelines and any odour complaints made since the previous audit;*
 - 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);*
 - review the adequacy of strategies, plans or programs required under these approvals; and, if appropriate; and*
 - recommend measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under these approvals.*
- Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Director-General.*

Cardno has been repeatedly engaged to undertake the Independent Environmental Audit to satisfy Schedule 5, Condition 7 of Project Approval 06_0139 (as modified). The initial audit was carried out on or about 7 December 2013

The second independent environmental audit was initiated on or around April 2015 and the audit report was dated 21 August 2015. The Audit report (including the requisite component on odour) was submitted to the DOP in or about September 2015, however the DOP then requested that the auditors undertake an audit of every individual condition of consent (including Environmental Protection Licences), as opposed to the normal sample of conditions ordinarily selected for audit. Cardno was commissioned to undertake the second phase of the 2015 audit. The findings and recommendations are contained in a report dated 12 April 2016 (already provided to the Department) and should be read in conjunction with those in the initial audit report.

The Environmental Audit was designed to assess compliance with Project Approval 06_0139 (as modified), Environmental Protection Licence (EPL) 20121 and 13426.

The audit included:

- ☐ Consultation with relevant agencies;
- ☐ Desktop review of appropriate supporting documentation;
- ☐ A site inspection incorporating an audit of compliance with the relevant project approval and Environmental Protection Licence documentation;
- ☐ Follow up review of supplementary documentation;
- ☐ Follow up meeting to discuss draft audit findings and corrective actions taken with DADI; and
- ☐ Revision and issue of the audit.

Audit Participants

The following people actively participated in the 2015 audit:

- ☐ Jolyon Peart (Cardno, Lead Auditor);
- ☐ James Pederick (Cardno, Auditor);
- ☐ Alicia Marix-Evans (former Legal Counsel, DADI);
- ☐ Rodney Johnson (DADI, Group Operations Manager);

By written agreement between DADI Legal and the Department, the initial audit excluded an odour audit until such time as the greenwaste operations were fully operational. Cardno undertook an *Independent Environmental Audit* at the Genesis Facility between June and August 2015. The findings of the audit are presented in an audit report dated 21 August 2015.

As the site is now fully operational, Cardno undertook a second round of environmental auditing for completeness.

Response to Audit Recommendations

Taking into account the initial and secondary phases of the 2015 Audit, the proponents Eastern Creek Waste Project was on average 94% compliant with all its Environmental Protection Licenses, Management Plans, Environmental Assessments, Statement of Commitments and Agency Consultation Requirements.

DADI will follow the recommendations made in the audit report to ensure the Projects continued high level of Environmental Performance. These include:

a) Exceedances of suspended solids concentration Limit in OSD basins - Condition L2 of Licenses 13426 and 20121

Review of monitoring results showed that exceedances of suspended solids concentration limit occurred in the south-west surface water detention basins on 31 January and 2 February 2013. Exceedances also occurred from the overflow of both the north-west OSD basins on 2 Feb 2013 and from the south west OSD on 31 Jan 2013 and 25 March 2015.

The exceedances referred to were caused by heavy rainfalls (historical rain data available), noting that Condition L2, 4 provides that 45ml of rain will not be taken as non-compliance. Further, independent

environmental consultants have confirmed that no exceedances or overflow have occurred for at least one year i.e since April 2015. Sediment control measures have been actively maintained including by way of monitoring every quarter and this will continue.

b) pH levels in OSD basins higher than the specified range – Condition L2.2 of License 20121

Review of monitoring results showed that pH levels in the south west OSD and north west OSD were higher than the specified range on 31 January and 30 January 2013 respectively. pH levels were also exceeded in the south west basin overflow in measurements taken on 23 February 2013.

The Proponent repeats its comments for Item A above. As far as it is aware, this matters referred to by the auditor related to historical (2013) data. Independent environmental consultants have confirmed no further incidents for at least the past year.

c) Wood stock piles – Condition L3.6 of License 20121

Condition L3.6 of EPL License 20121 states that each individual wood waste stockpile both processed and unprocessed will be limited in size to <2000 tonnes. Cardno found that the volumetric survey report sighted indicated stockpiles of wood were higher than the limit in December 2013.

Since December 2013 DADI has continuously maintained and monitored individual wood waste stockpiles and limited woodwaste stockpiles to <2000 tonnes in accordance with Condition L3.6 of License 20121. This practice will continue in the future under the direction of the Group Operations Manager.

d) Bund surrounding leachate collection tanks – Condition O7.2 of License 20121 and Condition 06.0139 3.20 of the Project Consent

It was deemed unclear whether the bund surrounding the leachate collection tanks has been specifically engineered and is capable of containing 110% volume of the tanks in the event of a failure. It is also unclear whether the bunding would contain any pressurised leaks.

The proponent was unable to provide evidence of the capacity of the tanks. In response, the Proponent proposes to re-seal the bunding and simultaneously engage an engineer or hydrologist to undertake a survey to demonstrate bunding capacity and determine containment of volume in tanks in event of failure or pressurised leaks within 3 months. The Group Operations Manager will be responsible to ensure completion.

e) Bund surrounding chemical and oil storage area in the workshop – Condition O7.2 of License 20121

The chemical and oil storage area in the workshop was observed within a concrete bunded area. However, it is unclear whether the bunds have been engineered to contain 110% of the largest vessel contained within the bund.

The Proponent repeats its comments from Item D and proposes to engage an engineer and/or hydrologist to illustrate compliance due to presence of secondary tank/free flowing oil and water separator.

f) Odour Management – Condition M7.2 of License 20121 and Condition M7.1 of License 13426

Condition M7.2 of License 20121 and condition M7.1 of License 13426 states that 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.

A new Field Odour Assessment was undertaken in March 2016. A new Odour Management Plan will be implemented within the next 6 months in accordance with EPL conditions and EPA guidelines.

g) Preventative measures undertaken to avoid potential pollution in an emergency – Condition E3.2 of License 13426

It has been suggested that it is unclear what preventative measures would be undertaken to avoid potential pollution in an emergency. Cardno has suggested that the proponent have a procedure to prepare the site in the event of an impending or ongoing emergency (e.g. earthquake, storm, fire, flood) to prevent pollution.

In March 2016, DADI revised its existing Pollution Incident Response Management Plan to reflect Cardno's recommendations, and has concurrently engaged with First 5 Emergency Consultants to revise the Emergency Evacuation Management Plan in accordance with Condition E3.2 of License 20121. This is anticipated to be finalised within the month.

h) Frequency of surface and groundwater sampling – Condition M2.1 and M2.2 of License 13426

Cardno has found that the sampling of onsite detention basins in 2014 was not scheduled as required in accordance with condition M2.1 and M2.2 of License 13426. In 2015, DADI engaged EnvironConsulting Services and has been compliant with sampling requirements since that time. EnvironConsulting Services have ensured all surface and groundwater samples are collected for each monitoring/discharge point at the specified frequency in accordance with M2.1 and M2.2 of License 13426. The results of which are available on the DADI website. This process will continue to occur.

i) Closure and rehabilitation plan – Condition 06 0139 4.2 of the Project Consent

The LEMP, Section 6.5 - Proposed Approach to Site Closure and Rehabilitation - sets out planning measures for site closure and rehabilitation. It has been deemed not clear if the LEMP has been submitted to the EPA or Council for consultation.

The Proponent has received an opinion on 16 February 2016 from an independent consultant to the effect that given the potential for legislative changes in the intervening period before closure of the landfill and that current and proposed EPA guidelines require a Closure Plan to be prepared close to or on actual completion of a landfill's waste receipt Operations it would be untimely and impracticable to prepare an adequate rehabilitation/Closure Plan for the site at the current time. A copy is available upon request.

j) Formalised weed monitoring – Condition 1.6 of Environmental Management Plans

Cardno has suggested that weed monitoring on site be formalised in accordance with condition 1.6 of Vegetation Management Plan. DADI continues to engage contractors, specialising in the removal of weeds to complete weeding as per the sites regular weeding schedule. Following each visit the Weed Monitoring Register is completed by DADI personnel and/or the relevant contractor. The completion of this register allows DADI to monitor, identify and respond to the occurrence of plant species which may pose a potential threat to natural areas.

In addition, DADI personnel continue to undertake photo audits of the Conservation Area and Riparian Zone from the monitoring points identified in the sites Vegetation Management Plan in accordance with monitoring requirements. The Group Operations Manager will ensure that the procedures in place are continuously maintained.

A summary of the Audit findings is at Appendix I

Environmental Performance

Senior management conduct regular environmental inspections of the Facility.


These inspections are needed to determine, in conjunction with the routine environmental monitoring and incident/complaint reporting procedures, whether there is on-site compliance with the approved EMS. Any non-conformances are recorded on inspection forms and the cause of any non-conformances are investigated by the site operations manager.

Site Security & Signage

Salient Matters	Nil
Works that were carried out in the past year	Continued maintenance and repair of the site's fencing and lockable security gates for security and public safety Installation of a sign to more clearly identify the phone number that is to be called to lodge a complaint.
Works that are proposed to be carried out over the next year,	Continued maintenance and repair of the site's fencing for security and public safety. Continued maintenance and repair of the locked gates around perimeter of the Conservation Area to prevent public access.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; • the monitoring results of previous years; • the relevant predictions in the EA;	No Monitoring Applicable Complaints Records Nil.
Any non-compliance over the last year	Nil
Describe what actions were (or are being) taken to ensure compliance;	Continuation of active inspection, maintenance and upkeep.
Identify any trends in the monitoring data over the life of the project;	Not Applicable
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Not Applicable
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Not Applicable

Amenity Berms

Salient Matters	Nil
Works that were carried out in the past year	Ongoing, inspections, maintenance and reshaping

	<p>of the amenity berms has been required to maintain the required height of the berms, ensure stability of the berms and prevent damage from erosion.</p>  <p><i>Aerial photo identifying amenity berms</i></p>
Works that are proposed to be carried out over the next year,	<p>Continuing maintenance and repair of amenity berms, with particular emphasis on reducing weeds and allowing native grasses and plants to grow, reducing erosion and increasing the stability of the berms, in line with the Landscape and Vegetation Management Plan.</p> <p>Also, Modification 5, which was submitted to the DOP and other relevant bodies for approval in 2015 and approved by the DOP in March 2016, requires additional reshaping of amenity berms to screen a pre-sort enclosure on the premises which will optimise recycling at the facility.</p>
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	<p>No Monitoring Applicable</p> <p>Complaints Records Nil. Given the lack of complaints from neighbouring premises, it can be assumed that all earthworks required to reshape the amenity berms on site have not impacted on adjoining landowners (Condition 55 OF Schedule 3).</p>
Any non-compliance over the last year	Nil
Describe what actions were (or are being) taken to ensure compliance;	Continuation of active inspection maintenance and upkeep of the berms ensuring height, shape and appropriate vegetation.
Identify any trends in the monitoring data over the life of the project;	Amenity berms continue to be effective providing a visual screen around the site, noise attenuation and a shield against airborne particulate generation.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Nil
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	To improve the environmental performance of the project, particular emphasis will be placed on increasing weeding activities and where applicable planting on amenity berms, in line with Landscaping and Vegetation and Amenity Berms Management Plans, to further increase the stability and soil health of the amenity berms.

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Odour Management

Salient Matters	Leachate Management Green Waste Management
Works that were carried out in the past year	Maintenance and Repair of the leachate tanks, wood stockpiles area and MPC to minimise odour generation. Implementation of the Air Quality, Odour and Greenhouse Gas Management Plan
Works that are proposed to be carried out over the next year,	Continued maintenance and repair of the leachate tanks, wood stockpiles area and MPC to minimise odour generation.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	<p>Monitoring Results The Odour Unit Pty Ltd conducted a Field Ambient Odour Assessment Survey downwind of the Genesis Facility on 10th June 2015 found minimal adverse odour impact beyond the Facility boundary.</p> <p>Complaints A telephone complaint was received by EPA after hours on 27 June 2015 in relation to alleged odour coming from Dial a Dump. On 28 June 2015 EPA officers were said to be "in the vicinity of the site" and expressed the view it may have been generated from the Genesis premises.</p> <p>On 27 and 28 June the Licensee-holder investigated practices at the site and confirmed to the EPA that the offensive odour in the area did not come from the Genesis facility. The Genesis facility was closed at the time of the complaint and no issues had occurred with the management of leachate on site.</p> <p>A detailed register of complaints and subsequent investigation and action taken is maintained on the website.</p>
Any non-compliance over the last year	Nil
Describe what actions were (or are being) taken to ensure compliance;	Continuation of existing work practices within the site and within the MPC, including daily covering of the active tipping face, ensuring all waste received at the MPC is unloaded inside the building and optimal operation of the leachate management system, to minimise odour generation.
Identify any trends in the monitoring data over the life of the project;	The review of the Odour Assessment, odour monitoring results and complaint records over the life of the project show that the Genesis Facility is complying with statutory requirements.
Any discrepancies between the predicted	The actual odour impact of the project has been

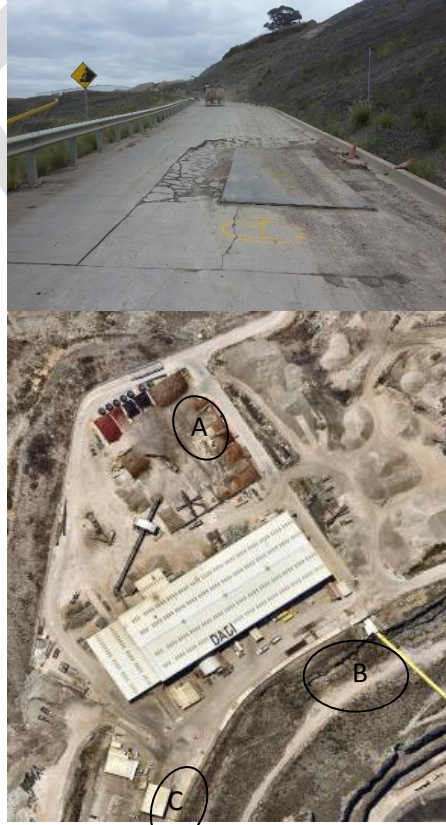
and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	less than predicted as Genesis does not receive and stockpile green waste (only wood waste). Approval was originally granted for this activity and It was predicted that this would cause significant odour, however as yet the proponent has decided not to undertake this activity onsite.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of all existing systems.

Operating Hours & Noise

Salient Matters	Nil
Works that were carried out in the past year	Implementation of the Noise Monitoring Program, repair and maintenance of plant and equipment and amenity berms onsite to minimise noise generation.
Works that are proposed to be carried out over the next year,	Continued implementation of the Noise Monitoring Program and maintenance and report of plant and equipment and amenity berms.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	<p>Monitoring Results</p> <p>Pacific Environment conducted noise compliance assessments for the Genesis Facility in June 2015 and found that the facility complies with specified EPL noise limits at the nearest residential receivers.</p> <p>Complaints Records</p> <p>Nil.</p>
Any non-compliance over the last year	Nil
Describe what actions were (or are being) taken to ensure compliance;	<p>Continuation of existing work practices including Noise Monitoring Programs carried out by a qualified Environmental Consultant.</p> <p>All on-site operating plant machinery is well maintained and noise muffled; no rock breaking to occur except at lower levels on the site or behind earthen bunds to act as noise baffles, monitoring and mitigating noisy behaviours of trucks entering the premises.</p>
Identify any trends in the monitoring data over the life of the project;	The review of noise monitoring results over the life of the project, and the lack of noise complaints since construction of the project concluded and partial operations commenced in 2012, show that the Genesis Facility continues to comply with statutory requirements and EPL noise limits.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	The predicted noise modelling undertaken in the Environmental Assessment by ERM showed that the cumulative industrial noise impacts were predicted to be negligible, with noise levels

	<p>remaining below the amenity noise goals during all modelled weather conditions.</p> <p>The NSW Department of Planning approved extended operating hours for the MPC in December 2013 and there have been no identified additional noise impacts from this change.</p>
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of all existing systems.

Air Quality

Salient Matters	<p>Dust Deposition</p> <p>Landfill gas</p>
Works that were carried out in the past year	<p>Dust Deposition</p> <p>Dust deposition monitoring gauges maintained at the positions shown in the Air Quality Management Plan. A Dustrak live realtime monitor is located at 93 Minchin Drive, Minchinbury. Both of these systems are monitored by Pacific Environment with remote warning systems in the case of exceedance recorded by the Dustrak monitor.</p> <p>Improvement, maintenance and repair to paved roads to ensure good quality surfaces which minimise airborne particulates.</p>  <p>Major repairs included the following: A – Concrete failure at primary intersection. Concrete removed and new subbase</p>

	<p>established, double mesh installed and concreting works completed.</p> <p>B – Concrete failure over culvert. Concrete removed, subbase removed to the depth of the culvert on both sides of the culvert, drainage medium installed, core holes installed in culvert, subbase reinstated, double meshed and concrete poured.</p> <p>C – Concrete failures at site entrance. Concrete removed and new subbase established, drainage medium installed, double mesh installed and concreting works completed.</p> <p>Maintenance and repair of water sprays and sprinklers throughout the facility and on facility paved roads to minimise airborne particulates.</p> <p>Landfill Gas An updated landfill gas monitoring program was implemented in 2015, with monthly surface and accumulated gas monitoring undertaken by EnvironConsulting Services and quarterly sub-surface landfill gas monitoring undertaken by Pacific Environment.</p>
Works that are proposed to be carried out over the next year,	<p>Continuous review of Dustrak monitoring technology to ensure optimum monitoring and compliance with relevant standards of air quality.</p> <p>Continued implementation of the Landfill Gas Monitoring program.</p>
<p>Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria;</p> <ul style="list-style-type: none"> • the monitoring results of previous years; • the relevant predictions in the EA; 	<p>Monitoring Results Dust Deposition Dust monitoring was undertaken monthly by Pacific Environment Pty Ltd and reported to DADI quarterly. Despite Genesis recording high deposited dust levels for two months in 2015, the EPL annual average limit of 4 g/m²/month was not exceeded, as mitigation measures were put in place and have continued to be effective. There were no occasions where the 24-hour average PM₁₀ concentration was above the impact assessment criteria of 50 µg/m³.</p> <p>Landfill Gas Landfill gas monitoring found that results did not exceed the thresholds specified in the Landfill Gas Monitoring Plan, during the monthly surface and accumulated gas monitoring and quarterly sub-surface landfill gas monitoring.</p> <p>Complaint Records Nil</p>
Any non-compliance over the last year	Nil
Describe what actions were (or are being) taken to ensure compliance;	<p>Maintenance of stockpile height within the SMA to remain below the height of the amenity berms.</p> <p>Continuous enhancement of automated water sprays and sprinklers in the SMA and on facility</p>

	<p>paved roads to minimise airborne particulates.</p> <p>Continuation of dust suppression measures including wetting down stock piles, ensuring trucks cover their loads, limiting the speed of vehicles on site and requiring all trucks leaving the site to pass through a truck wheel wash before returning to sealed roads within the Facility.</p> <p>Within the MPC there has been a continuous improvement program to enhance air quality within the building. This is a necessary requirement for optimum workplace health and safety. It has involved the identification of individual and specific dust generating points from the recycling plant with enclosure of same and extraction points before the airborne particulars become unmanageable within the building.</p>
Identify any trends in the monitoring data over the life of the project;	<p>Dust Deposition 24-hour averaging and annual averaging PM10 deposition monitored at a nearby residential receptor generally decreased in 2014 and have stabilised at ~15-16 µg/m3 in 2015.</p> <p>Dust deposition monitored at the gauges along the site boundary have also been relatively stable below the 4 g/m2/month limit across the life of the project, with the two spikes in 2015 not having a significant impact on the annual average.</p> <p>Landfill Gas Landfill gas monitoring completed in 2015 has found that methane concentration is below the target thresholds described in the Landfill Management Plan, with 0% v/v methane found in the sub-surface and accumulated gas monitoring locations. Tests undertaken by Pacific Environment Ltd found that no methane was recorded over the landfill area on either 4 June 2015 or 3 July 2015.</p>
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	The use of a chute from the MPC to the landfill has reduced the number of trucks using the partially unpaved road down to and up from the landfill, and continues to reduce predicted dust generation levels on site.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of all existing systems on site and air quality monitoring.

Salient Matters	Landfill fill rate
Works that were carried out in the past year	<p>Inspection, maintenance and repair of draining system, hardstand areas, roads and detention dams, to ensure continued segregation of 'clean' and 'dirty' water, sediment control and water quality.</p> <p>A new HDPE lined stormwater dam was also created within the landfill area with an increased capacity in conformity with the requirements set out in the EA. As this water has not come into contact with landfilled waste, the water is deemed 'cleaned' and reused onsite.</p> <p>Landfilling is continuing to take place in accordance with the Landfill Environment Management Plan. Because of the inverted conical shape of the quarry, progressively the same incoming quantity of landfill material could be expected to spread and filled over a larger and larger surface area. The result is that the fill rate per year slows for the same given quantity of waste. In turn this prolongs the useable life of the stormwater collection pond and the time required before each replacement becomes longer.</p>
Works that are proposed to be carried out over the next year,	<p>Continued inspection, maintenance and repair of drainage system, hardstand areas, roads and detention dams.</p> <p>Revision of the site water balance to align with increased water storage capacity and usage at the site.</p>
<p>Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria;</p> <ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	<p>Monitoring Results</p> <p>Water quality monitoring at the two stormwater retention dams on site (EPA monitoring points 2 & 3) was conducted quarterly by EnvironConsulting Services in 2015. A review of the monitoring results found that:</p> <ul style="list-style-type: none"> Ammonia levels decreased in 2015 from previous years. pH levels slightly increased from below 8.5 in previous years, to above 8.5 in Quarter 4 2015. Total suspended solids results greatly improved to below 10 mg/L in Quarter 4 2015. Heavy metal and Total Phosphorus concentrations have remained low in 2015. <p>The dams did not overflow in 2015, as the water was reused on site. Therefore there are no monitoring results for EPA monitoring points 5 & 6 in 2015 and no EPL limits were exceeded.</p> <p>Complaints records Nil</p>
Any non-compliance over the last year	Three samples collected from Monitoring Points 2 and 3 (onsite stormwater retention dams) instead of the four samples required. Additional

	samples are to be collected in the current monitoring year to mitigate any adverse effects of the non-compliance.
Describe what actions were (or are being) taken to ensure compliance;	<p>Site area separation and gradation to separate 'clean' and 'dirty' water</p> <p>Maintenance of site drainage gross pollutant sumps and traps to reduce sediment levels and pollution of stormwater.</p> <p>Maintenance of roads to reduce erosion and sedimentation</p> <p>Protection of stormwater drains</p> <p>Daily litter collection and sweeping of paved roads.</p> <p>Regular inspection of surface water infrastructure and during storm events.</p>
Identify any trends in the monitoring data over the life of the project;	<p>Water quality of stormwater in the retention dams has remained at a high enough level over the life of the project to be reused onsite.</p> <p>In extraordinary rain events, whilst the Suspended Solid rate of stormwater discharge tends to increase, the volume of water relative to the SS rate is generally considered acceptable. However, this was not an issue in 2015, as no stormwater was discharged/overflowed.</p>
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	<p>Increasing levels of water reuse onsite for dust suppression and other activities has reduced dam overflow events to 0 in 2015, minimising any potential impact on surrounding waterways.</p> <p>This indicates a need to revise the Site Water Balance to reflect the changing water storage capacity and uses on the site.</p>
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	<p>Continuation of all existing monitoring and safety systems.</p> <p>Revision of the site water balance to better reflect the current water usage of the site and identify additional measures for water capture and water use minimisation.</p>

Landfill and Chute

Salient Matters:

- Northern Slip stability works
- Groundwater monitoring
- Leachate Collection
- Chute Maintenance and reduction

Salient Matter	Northern Slip stability works
Works that were carried out in the past year	<p>The area that was subject to the 2013 landslip has undergone controlled blasting carried out by external contractors in accordance with WorkCover's approval. The area is monitored by appropriately trained staff on a weekly basis to ensure the area remains stable.</p> <p>JK Geotechnics inspected the slip during August</p>

	2015, confirming that the cracks and voids in the slip have remained similar or reduced in depth. DADI & JK Geotechnics have developed a potential methodology to fill under the landfill slip whilst maintain employee safety.
Works that are proposed to be carried out over the next year,	Continuation of daily inspections to identify the potential for any further slippages. No further works are anticipated at this stage, but it will be subject to the outcomes of the daily monitoring.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	No further slippages have so far been identified. Complaints Register Nil
Any non-compliance over the last year	Nil.
Describe what actions were (or are being) taken to ensure compliance;	Continuation of daily inspections and training of quarry staff to ensure safety awareness of potential slip area.
Identify any trends in the monitoring data over the life of the project;	No further slippages have so far been identified since stabilisation works were completed in 2013.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Not Applicable.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of all existing monitoring systems.

Salient Matter	Groundwater monitoring
Works that were carried out in the past year	Replacement of blocked groundwater monitoring bores 10d and 12d by drilling groundwater monitoring bores 25d and 26d.
Works that are proposed to be carried out over the next year,	In a letter dated 3 December 2015 (Annexure A), the EPA has approved the installation of the Stage 2 Groundwater Monitoring Network as required by under condition E5.1 of License No 13426. This variation of License No. 13426 allows for the installation of six (6) new groundwater bores. EnvironConsulting Services Pty Ltd have been engaged to supervise the installation of the groundwater bores in 2016.
review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria;	Monitoring Results Groundwater quality monitoring was conducted quarterly by EnvironConsulting Services in 2015 at EPA monitoring points 7-25. This excluded monitoring points 21 and 22 in the first half of 2015, as the boreholes are blocked and

<ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	<p>replacement bores were not drilled until Quarter 3 2015.</p> <p>Groundwater quality has been maintained in 2015, when comparing monitoring results to previous years.</p> <p>Complaints Records Nil</p>
Any non-compliance over the last year	<p>Boreholes 10d and 12d (EPA monitoring points 21 and 22 respectively) are blocked and groundwater was not able to be monitored at these points in the first half of 2015.</p> <p>Reduced number of samples were also collected from three other boreholes due to insufficient groundwater present and/or low yields during some or all of the monitoring rounds.</p> <p>Additional samples are to be collected in the current monitoring year to mitigate any adverse effects of the non-compliance.</p>
Describe what actions were (or are being) taken to ensure compliance;	Continuous monitoring will continue to assess if leachate is leaving the site regardless of the inwards flow of groundwater towards the quarry.
Identify any trends in the monitoring data over the life of the project;	Groundwater quality has been maintained over the life of the project.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Groundwater quality has been as predicted in the Soil, Water and Leachate Management Plan.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continuation of all existing monitoring systems.

Salient Matter	Leachate Collection
Works that were carried out in the past year	<p>Treatment of the leachate now takes place pursuant to arrangements entered into by the site operator with Sydney Water to ensure that the leachate achieves chemical parameters acceptable to Sydney Water before discharge.</p> <p>Works continued to regularly increase the height of the main leachate sump riser (Monitoring Point 26) as the level of filled waste rose.</p>
Works that are proposed to be carried out over the next year,	<p>A Leachate quality improvement program is expected to be carried out in 2016, with treatment levels to increase to the point of allowing the use of treated leachate as recycled water for dust suppression program.</p> <p>Sydney Water approved an increase to the treated leachate discharge rate, from 7L to 14L for 24 months, in early 2016.</p> <p>Drilling also took place in early 2016 to replace the leachate monitoring well for EPA monitoring point 27.</p>

	Works will continue to regularly increase the height of the main leachate sump riser (Monitoring Point 26) as the level of filled waste rose.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	<p>Monitoring Results</p> <p>Leachate quality monitoring was conducted quarterly by EnvironConsulting Services at EPA monitoring point 26. Leachate levels were also monitored by EnvironConsulting Services at Monitoring Point 27</p> <p>Leachate quality was maintained in 2015 from previous years and successfully treated.</p> <p>Complaints Records</p> <p>Nil</p>
Any non-compliance over the last year	No samples were collected from Monitoring Point 25 (temporary groundwater interception sump) as this was decommissioned in June 2013. Three samples were collected from Monitoring Point 26 (Leachate Sump) instead of the four samples required. Conductivity and pH could not be measured on one occasions due to equipment failure.
Describe what actions were (or are being) taken to ensure compliance;	<p>Automated monitoring and dosing of treatment chemicals have been implemented with remote alarm and telephone warning systems in the case of an exceedance of any parameters.</p> <p>Continuation of active inspection maintenance and upkeep of the leachate sequence batch reactor and nitrifying bacterial.</p> <p>Additional samples are to be collected in the current monitoring year to mitigate any adverse effects of the non-compliance.</p>
identify any trends in the monitoring data over the life of the project;	There have been no long term changes in leachate quality. Trade waste conditions are satisfactorily met.
any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	<p>It had been speculated that in the initial stages of landfilling there may be insufficient material upon which the nitrifying bacteria of the SBR could operate.</p> <p>Currently, there is always enough suitable material present in the waste mass which is evidenced in the ammonia content of the leachate for the nitrifying bacteria of the SBR to operate.</p>
describe what measure will be implemented over the next year to improve the environmental performance of the project.	Improvements to the leachate piping system will ensure leachate tanks are filled at an optimum rate.

Salient Matter	Chute Maintenance and reduction
Works that were carried out in the past year	<p>Reduction in chute length when required as the filled level of waste rises. Throughout 2015 1.5 segments were removed from the chute.</p> <p>The footings and structural integrity of the chute are inspected and monitored in the manner set out in the Chute Management and</p>

	Maintenance Plan approved by the Department.
Works that are proposed to be carried out over the next year,	Continued reduction in chute length as required. Continued inspection, maintenance and repair of the chute and conveyor system.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	No observations to suggest the occurrence of any adverse developments in the footing and structural integrity of the chute. Complaints Records Nil
Any non-compliance over the last year	Nil
Describe what actions were (or are being) taken to ensure compliance;	Regular maintenance of chute and the internal misting system. Visual inspections by appropriately trained staff.
Identify any trends in the monitoring data over the life of the project;	There have been no occurrences of any adverse developments in the footing and structural integrity of the chute since its construction.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies.	Nil.
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Continued maintenance and inspection of chute.

Waste Management Procedures.

Salient Matters	Material types accepted at the premises. Rejection of Loads Potential Asbestos Contaminated Loads
Works that were carried out in the past year	In August 2015, the EPA granted approval for the variation of License 13426. The following variations have been made to this license: Add condition 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: <ul style="list-style-type: none"> a. “2009/07 Metallurgical furnace slag or metallurgical furnace slag contaminated natural excavated materials” and b. “1995/05 Ash, ash-contaminated natural excavated materials or coal-contaminated natural excavated materials”
Works that are proposed to be carried out	A modification to the Project Approval (Mod 5) is

over the next year,	expected early 2016. This will allow for a "pre-sort enclosure" installed on the premises which will increase the optimum recycling output of the Project.
Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; <ul style="list-style-type: none"> the monitoring results of previous years; the relevant predictions in the EA; 	No Monitoring Applicable Complaints Records Nil
Any non-compliance over the last year	The EPA and WorkCover completed a joint inspection of the landfill in August 2015. During the inspection of the asbestos tipping area it was identified asbestos material was appearing on top of the cover material. It was suspected that this was due to excessive rainfall in proceeding days combined with the weight of the machine operating in the area. DADI instigated a voluntary closure of the asbestos and surrounding tipping areas and applied additional VENM cover. The EPA and WorkCover were notified upon completion of the works and the area reopened.
Describe what actions were (or are being) taken to ensure compliance;	Initial weighing and visual screening of waste entering site. MPC spotters employed to ensure recyclable waste is sorted correctly and no waste that is not permitted is allowed onsite. Tipping Face Spotter employed on site to ensure that vehicles are directed to the correct location to tip their waste and no waste that is not permitted is allowed on site. Rejected loads register is being continuously maintained by DADI.
Identify any trends in the monitoring data over the life of the project;	Not Applicable
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	Nil
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	Modification to the Project Approval will see a "pre-sort enclosure" installed on the premises which will increase the optimum recycling output of the Project.

Cultural Heritage

Salient Matters	Salvage of Aboriginal Cultural Material Integrity of archeologically sensitive areas
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Works that were carried out in the past year	<p>Inspection, maintenance and repair of fencing around the Conservation area to control access to classified archaeological sensitive land (Zone 1)</p> <p>Continued monitoring of Conservation Area.</p> <p>Continued consultation with Local Aboriginal Communities.</p> <p>Continued Cultural awareness training for all employees on site to meet the Projects cultural targets.</p>
Works that are proposed to be carried out over the next year,	<p>Construction of Mod 5 pre-sort centre in an area classified as Zone 3 (having little archaeological sensitivity).</p> <p>Continued maintenance of fencing around the Conservation area.</p>
<p>Review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria;</p> <ul style="list-style-type: none"> • the monitoring results of previous years; • the relevant predictions in the EA; 	<p>Monitoring Results</p> <p>Regular monitoring of culturally sensitive land is undertaken by employees through monthly photo audits. Since construction there has been no further discovery of any Aboriginal cultural materials. Cultural monitoring results are consistent with previous years and this is predicted to continue.</p> <p>Monitoring results correspond with the projects aim to restrict access and protect culturally sensitive areas of site, in accordance with the objectives set out in s 2A of the <i>National Parks and Wildlife Act 1974</i>.</p> <p>Complaints records Nil</p>
Any non-compliance over the last year	Nil
Describe what actions were (or are being) taken to ensure compliance;	<p>Fencing and regular surveillance of site to control access to archaeologically sensitive areas.</p> <p>Regular cultural awareness training of all personnel and contractors on site.</p> <p>Regular monitoring of culturally sensitive areas to maintain integrity of the environment.</p> <p>Continued implementation of Work Procedure in the event aboriginal materials are found.</p> <p>Updating of Aboriginal Materials Catalogue as required.</p>
Identify any trends in the monitoring data over the life of the project;	There has been little change to site since initial construction, monitoring data is consistent.
Any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;	N/A
Describe what measure will be implemented over the next year to improve the environmental performance of the project.	<p>Continuation of all existing monitoring and control systems.</p> <p>Ongoing consultation with Darug Custodian Aboriginal Corporation.</p>

Compliance

Relevant Statutory Monitoring Requirements

The monitoring requirements for dust and surface water are as set out in EPL 20121 conditions P1 and M1 to M7 inclusive. The monitoring requirements for groundwater, surface water and leachate are set out in EPL 13426 P1 and M1 to M7.

Additionally odour, landfill gas and noise assessments are regularly completed in line with the site's Air Quality, Odour and Greenhouse Gas Management Plan and Landfill Gas and Noise Monitoring Programs. The noise limits are set out in EPL 20121 condition L4 and EPL 13426 condition L4.

Environmental Protection Licence Non-compliances

Under EPL 13426 (Quarry) the following minor non-compliances were reported in the Annual Return for the EPA in 2015:

1. Three samples collected from Monitoring Points 2 and 3 (onsite stormwater retention dams) instead of the four samples required.
2. Reduced number of samples collected from 3 groundwater monitoring wells due to insufficient groundwater present and/or low yields during some or all of the monitoring rounds. No samples were collected from Monitoring Points 21 (BH10d) and 22 (BH12d) as these wells as these are inoperable due to blockages.
3. No samples were collected from Monitoring Point 25 (temporary groundwater interception sump) as this was decommissioned in June 2013. Three samples were collected from Monitoring Point 26 (Leachate Sump) instead of the four samples required. Conductivity and pH could not be measured on one occasions due to equipment failure.

Additional samples are to be collected in the current monitoring year were appropriate to mitigate any adverse effects of the non-compliance.

Under EPL 20121 (Recycling operations for MPC) nil non-compliances were reported in the Annual Return for the EPA for 2015.

Incidents and Complaints

Complaints Records

One complaint was made during 2015 concerning the project:

A telephone complaint was received by EPA after hours on 27 June 2015 in relation to alleged odour coming from Dial a Dump. On 28 June 2015 EPA officers were said to be "in the vicinity of the site and expressed the view it may have been generated from the Genesis premises.

On 27 and 28 June the Licensee-holder investigated practices at the site and confirmed to the EPA that the offensive odour in the area did not come from the Genesis facility. The Genesis facility was closed at the time of the complaint and no issues had occurred with the management of leachate on site.

A detailed register of complaints and subsequent investigation and action taken is maintained on the website and available for the public viewing at:

<http://www.dadi.com.au/assets/Genesis%20Complaints%20Register%20Published.pdf>

Information about how to make a complaint is available on the Genesis website at:
<http://www.dadi.com.au/landfills-and-recycling-centres.html>.

Reportable incidents

There have been no reportable incidents since the last Annual Review.

Additional Commitments

Public Safety

Since the Facility opened in mid-2012 a number of measures have been implemented to minimise the risks to the public and to ensure public safety:

- the site is fenced;
- speed signs and speed bumps erected at the end of DADI Drive entrance (approaching the Workshop);
- access points to the site are gated and locked after hours (with security patrols after hours);
- access points to the site have security and warning signs;
- all visitors (including consultants) must sign in & out of the visitors register located at the Administration Office;
- the site is under video surveillance; and
- restricted general access to potentially hazardous zones (e.g. inside the chute).

Changes to Development Approval and/or Environmental Protection Licences in 2015

In August 2015, the Licence-holder received an EPA grant for the variation of License 13426. The waste table in Condition L3.1 now includes Metallurgical furnace slag or metallurgical furnace slag contaminated natural excavated materials and Ash, ash-contaminated natural excavated materials or coal-contaminated natural excavated materials.

Waste classified as 'hazardous' in accordance with the Waste Classification Guidelines due to high levels of contaminant(s) is generally not suitable for disposal to landfill in NSW. However, if the contaminants are 'immobilised' so that they will not be released into the landfill leachate at levels of concern, then the EPA may grant an immobilisation approval to enable the waste to be landfilled.

Initiatives for the Next 12 Months

MOD 5 has been submitted to the DOP and other relevant bodies for approval. MOD 5 seeks to install a pre-sort enclosure on the premises which will optimise recycling on the facility and potentially increase the waste streams able to be recycled on the premises.

The Facility has a number of performance initiatives planned for the next 12 months including rolling out a detailed induction / training on-line program (with video footage and narration) to train all employees on key aspects of environmental compliance and work performance for the Genesis Facility.

Such modules for this program will include (to name a few), training in workplace policies, asbestos awareness & PPE, and tailored modules for the safe use of specialised equipment and tasks around the Facility. The Genesis induction training program is proposed to be rolled out in the first half of 2016, with preliminary preparation for the program already commenced.

Environmental initiatives for the Facility also include the continued implementation (and/or revision) of the requirements and commitments from the Genesis Recycling & Landfill Environmental Monitoring Plan and Programs. In particular, DADI has engaged Independent consultants, EnvironConsulting Services to revise the Site Water Balance as to align with current water usage at the site. Condition 22, Schedule 3 states 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 would be implemented to minimise water usage on site.

Strategic and Commercial Review

In concert with this operational environmental review the Corporate Group of the Licence holders has carried out a review against the commercial and policy imperatives which have occurred during the past twelve month period.

These include the phenomenon [now addressed by the NSW EPA] of the transportation of waste for landfilling interstate [notably Queensland] in order to advantage the lower levy.

The development and adoption by the NSW EPA of a Policy relating to the derivation of energy from waste.

The ongoing requirement to ensure that recycled products meet appropriate guidelines for safety and quality.

The Company has decided as a matter of policy to make these elements its core directives for the next following twelve month period.

These involve the following,

1. seeking an extension of operating hours for delivery to and within the MPC in order to facilitate ongoing maintenance and repairs to the Genesis Plant, prolonged hours for its use and extended pre-sort procedures to accommodate enhanced procedures for removal of potential asbestos (or asbestos appearing) materials.
2. Enhancing the timber sorting processes in order to maximise opportunities for beneficial re-use and thereby lowering the volumes of timber required to be stored on site.
3. Seeking construction approval for the construction on site of an additional under cover facility to allow for redirection of and enhancing retrieval procedures for the Commercial and Industrial Waste streams.
4. The progression of "The Next Generation" [TNG] Energy from waste planning application.
5. The progression and construction of the pre-sort enclosure for MOD 5.

Summary

SCHEDULE 5 TO CONSENT (06_0139 MOD 4)	
ENVIRONMENTAL MANAGEMENT, REPORTING & AUDITING	
ENVIRONMENTAL MANAGEMENT	
Environmental Management Strategy	
1. The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. The Strategy must:	Complies
a) be submitted to the Director-General for approval prior to the commencement of construction;	Complies
b) provide the strategic framework for environmental management of the project;	Complies
c) identify the statutory approvals that apply to the project;	Complies
d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;	Complies – Key Contact Personnel: Rodney Johnson (Group Operations Manager) – 0408 919 562 Graeme Cunningham (Site Manager) - 0429 293 909
e) describe the procedures that would be implemented to:	
<ul style="list-style-type: none"> keep the local community and relevant agencies informed about the operation and environmental performance of the project; 	Complies DADIs website contains links to up to date environmental performance of the project with monitoring results.
<ul style="list-style-type: none"> receive, handle, respond to, and record complaints; 	Complies
<ul style="list-style-type: none"> resolve any disputes that may arise during the course of the project; 	Complies
<ul style="list-style-type: none"> respond to any non-compliance; and 	Complies
<ul style="list-style-type: none"> respond to emergencies; 	Complies
f) include:	
<ul style="list-style-type: none"> copies of the various strategies, plans and programs that are required under the conditions of this approval once they have been approved; and 	Complies
<ul style="list-style-type: none"> a clear plan depicting all the monitoring currently being carried out within the project area. 	Complies
Management Plan Requirements	
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;	Complies
b) a description of:	Complies
<ul style="list-style-type: none"> the relevant statutory requirements (including any relevant approval, licence or lease conditions); 	Complies
<ul style="list-style-type: none"> any relevant limits or performance measures/criteria; 	Complies

	<ul style="list-style-type: none"> 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; 	Complies
c)	a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	Complies
d)	a program to monitor and report on the: <ul style="list-style-type: none"> impacts and environmental performance of the project; effectiveness of any management measures (see c above); 	Complies
e)	a contingency plan to manage any unpredicted impacts and their consequences;	Complies
f)	a program to investigate and implement ways to improve the environmental performance of the project over time;	Noted
g)	protocol for managing and reporting any: <ul style="list-style-type: none"> incidents; complaints; non-compliances with statutory requirements; and exceedances of the impact assessment criteria and/or performance criteria; and 	Complies
h)	a protocol for periodic review of the plan.	Complies
Annual Review		
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:	<p>According to the definitions of the Project Consent, the "project" is the development described in the EA. The EA describes the project as a resource recovery facility and landfill facility.</p> <p>The Recycling Environment Protection Licence commenced in June 2012 and the Landfill Environment Protection Licence commenced in December 2012. As such, the first annual review of the environmental performance of the project was undertaken in December 2013, being the anniversary of when the landfill operations commenced in accordance with the Environmental Protection Licences.</p> <p>This coincided with the commencement of the Independent Environmental Audit required by Condition 7.</p>
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;	Noted
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"> the relevant statutory requirements, limits or performance measures/criteria; the monitoring results of previous years; and the relevant predictions in the EA; 	Noted
c)	identify any non-compliance over the last year, and describe what actions were (or are	Noted

	being) taken to ensure compliance;	
d)	identify any trends in the monitoring data over the life of the project;	Noted
e)	identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and	Noted
f)	describe what measure will be implemented over the next year to improve the environmental performance of the project.	Noted
Revision of Strategies, Plans & Programs		
4.	Within 3 months of the submission of an:	
a)	audit under condition 7 of schedule 5;	The latest audit was initiated in or around April 2015 and submitted to DOP in September 2015. However, the DOP then asked for the audit to be revised to include all individual conditions. This reaudit was completed by the end of March 2016. Any revisions of the Project's Strategies Plans and Programs will be completed based on the results of the reaudit.
b)	incident report under condition 5 of schedule 5; and	Noted
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.	Noted
<i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</i>		
REPORTING		
Incident		
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.	Noted
Regular		
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.	Complies

INDEPENDENT ENVIRONMENTAL AUDIT		
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:	The Initial Environmental Audit was carried out in 2013 by Cardno. The second Environmental Audit was commenced in April 2015 and the reaudit requested by DOP was finalised on 12 April 2016 and provided to the Proponent.
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;	Noted
b)	include consultation with the relevant agencies;	Noted
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;	A full odour audit of the project was completed by Cardno in 2015.
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);	Noted
e)	review the adequacy of strategies, plans or programs required under these approvals; and, if appropriate; and	Noted
f)	recommend measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under these approvals.	Noted
<i>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Director-General.</i>		
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.	The latest audit was initiated in or around April 2015 and submitted to DOP in September 2015. However, the DOP then asked for the audit to be revised to include all individual conditions. The re audit was provided by the Proponent to the Department on 28 April 2016.
ACCESS TO INFORMATION		
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;	Complies
b)	a copy of the current environmental management strategy and associated plans and programs;	Complies
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;	Complies
d)	complaints register, which is to be updated on	Complies

	a monthly basis;	
e)	a copy of any Annual Reviews (over the last 5 years);	Complies
f)	a copy of any Independent Environmental Audit, and the Proponent's response to the recommendations in any audit; and	Complies
g)	any other matter required by the Director-General.	Noted

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2 Audit Findings

2.1 Environmental Performance

In Cardno's opinion, overall the project displayed a high level of compliance with respect to regulatory conditions contained within applicable EPL's and the project consent. Table 2-1 summarises the project's compliance / conformance status with respect to each of the sources of regulatory obligations.

The results of this secondary audit deemed compliance with 93% of EPL 20121 requirements, 96% of EPL 13426 requirements, 96% of the project consent conditions, 94% of the commitments made by the Environmental Assessment and 94% for the management plans. The findings of the combined initial and secondary phases showed comparable results and are also shown in the table below.

Table 2-1 Environmental Performance Summary

Source of Criteria	Compliance / Conformance Status of Secondary Audit	Overall (initial and secondary phases) Audit Compliance Status
Environment Protection Licences	The project was compliant with 91 out of a total of 98 criteria derived from EPL 20121 (93% compliance).	The project was compliant with 111 of 119 of all EPL 20121 licence conditions (93%).
	The project was compliant with 98 out of a total of 102 criteria derived from EPL 13426 (96% compliance).	The project was compliant with 114 of 120 of all EPL 13426 licence conditions (95%).
Project Consent	The project was compliant with 81 out of a total of 84 criteria (96% compliance).	The project was compliant with 96 out of a total of 100 criteria (96% compliance).
Environmental Assessment (ERM, 2008) Statement of Commitments	The project was conformant with 26 out of a total of 27 criteria (96% compliance).	The project was conformant with 35 out of a total of 37 criteria (94% compliance).
Management Plans	The project was conformant with 65 out of a total of 69 criteria (94% conformance).	The project was conformant with 87 out of a total of 98 criteria (88% conformance).
Assessments and Reports	The project was conformant with seven out of a total of seven criteria (100% conformance).	The project was conformant with ten out of a total of 11 criteria (91% conformance).
Agency Consultation	The project was compliant with four out of a total of four criteria (100% compliance).	The project was compliant with seven out of a total of seven criteria (100% compliance).

A detailed description of the compliance and conformance status with respect to each criterion is provided in **Appendix A**.