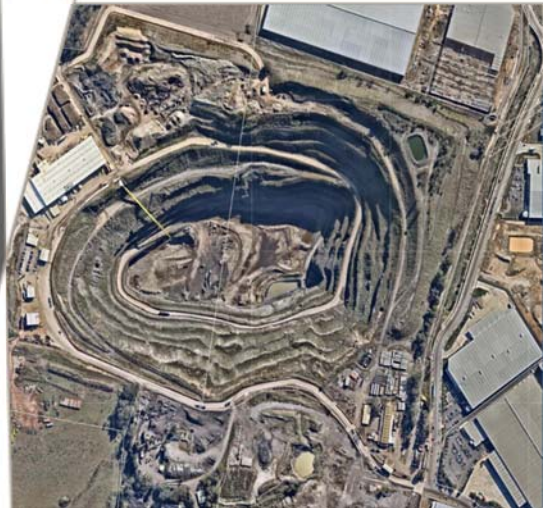


Independent Environmental Audit: Addendum 1

Genesis Landfill and Recycling
Centre

59916120



Prepared for
Dial a Dump Industries Pty Ltd

12 April 2016

Privileged and Confidential

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1 Introduction

1.1 Background

Cardno (NSW/ACT) Pty Ltd ('Cardno') was engaged by Dial a Dump Industries (DADI – 'The Client') to undertake an independent environmental audit of the Genesis Landfill and Recycling Centre. The audit purpose was to meet the requirements of Condition 7, Schedule 5 of the project consent 06_0139.

In fulfilling this condition, 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. This initial phase of audit evaluated the project against a portion of the relevant environmental requirements (approximately 25%). Following further consultation between DADI and the Department of Planning, it was deemed that the audit scope should include all existing environmental requirements.

Cardno undertook a second round of environmental auditing to evaluate compliance with respect to those regulatory requirements that were not assessed in the initial phase of the audit (the remaining 75%). This report has been prepared as an addendum to the initial audit report (*Independent Environmental Audit* of the Genesis facility, dated 21 August 2015).

The initial and secondary phases of audit are considered to be part of the same *Independent Environmental Audit*. Hence, the findings and recommendations made in this addendum should be read in conjunction with those of the initial audit report.

1.2 Audit Details

Key details pertaining to the audit are summarised in **Table 1-1**.

Table 1-1 Audit Details

Item	Details
Audit Team	Lead Auditor – James Pederick (Cardno) Auditor - Jolyon Peart (Cardno)
Audit Team Contact Details	C/O Cardno NSW ACT Pty Ltd Level 9 The Forum, 203 Pacific Highway St Leonards NSW 2065
Auditee	Alicia Marix-Evans (Dial a Dump Industries) Rodney Johnson (Dial a Dump Industries)
Auditee Contact Details	C/O Dial a Dump Industries 32 Burrows Road Alexandria NSW 2015
Audit Location	Genesis Landfill and Recycling Facility Honeycomb Drive Eastern Creek NSW 2766
Timeframe covered by the audit (the "audit timeframe")	9 th March 2012 - 12 th February 2016

1.3 Audit Program

The timing of key activities undertaken during this audit are summarised in **Table 1-2**.

Table 1-2 Audit Program

Task / Activity	Date
Review plans, procedures, develop audit criteria	1 February to 8 February 2016
Site familiarisation visit	9 February 2016
Audit site visit	9 February 2016
Audit de-brief meeting	12 February 2016
Draft report prepared	24 March 2016
Final report issued	12 April 2016

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**.

3 Conclusions and Recommendations

3.1 Recommendations

In order to improve the environmental performance of the project, a number of specific recommendations are made in relation to this audit. These are detailed within the 'Audit Findings and Recommendations' worksheet, presented as **Appendix A**.

Key recommendations are:

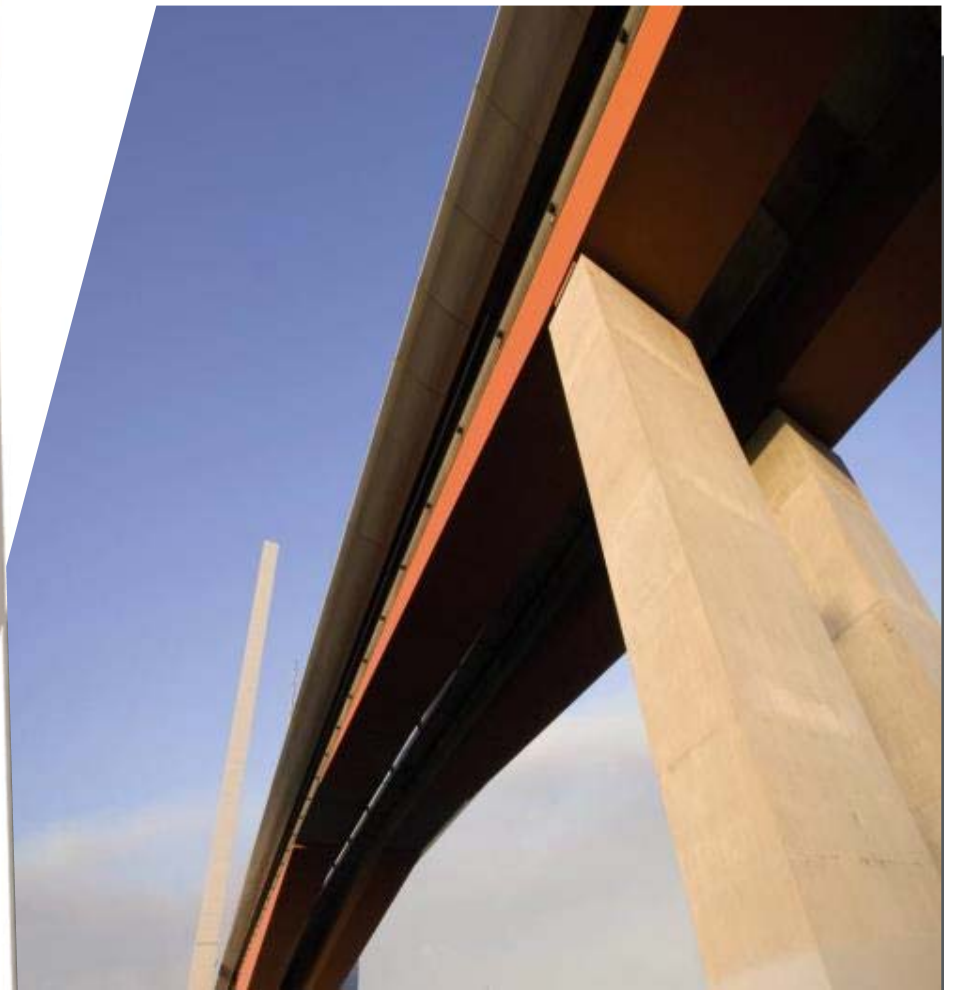
- > Ensure woodwaste stockpiles are kept below 2000 tonnes in accordance with requirements.
- > Undertake review of odour management plans to consider recommendations of the Field Ambient Odour Assessment and Review Study, The Odour Unit, August 2015.
- > Undertake reporting of groundwater monitoring results in accordance with the Groundwater Monitoring Plan, March 2012.
- > Ensure an inventory of emissions is developed for the project to monitor greenhouse gas emissions.
- > 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.
- > 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.
- > Develop a procurement process to include consideration of energy efficient plant.

Genesis Landfill and
Recycling Centre

APPENDIX

A

AUDIT FINDINGS AND
RECOMMENDATIONS



GENESIS FACILITY INDEPENDENT ENVIRONMENTAL AUDIT



C = Compliant NC = Non-Compliant N/A = Not Applicable

ENVIRONMENTAL PROTECTION LICENCE 20121 (RECYCLING / WASTE TRANSFER FACILITY, FORMALLY KNOWN AS THE MATERIALS PROCESSING FACILITY OR MPC) DATED 24 SEPTEMBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
1: Administrative Conditions								
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.	N/A	N/A	C	Noted.	C	
2	A2.1	The licence applies to the following premises: Genesis Recycling Facility	N/A	N/A	C	Noted.	C	
3	A3.1	This licence applies to all other activities carried on at the premises, including: - resource recovery (recovery of waste tyres)	N/A	N/A	C	Noted.	C	
4	A4.1	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.	N/A	N/A	C	Noted.	C	
5	A4.2	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).	N/A	N/A	C	Noted.	C	
2: Discharges to Air and Water and Applications to Land								
	P1	Location of monitoring/discharge points and areas						
6	P1.1	The following points referred to in the table below [EPL Page 7 of 26] 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.	Documentation review	Air Quality, Odour and Greenhouse Gas Management Plan, June 2015.	C	These monitoring points are documented in the AOC/GMP - Section 2.4 Monitoring and Compliance Reporting.	C	
7	P1.2	The following utilisation areas referred to in the table below [EPL Page 7 of 26] 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.	Documentation review	Soil, Water and Leachate MP, Dec 2011	C	The utilisation areas are included in the SWLMP - Section 6.3 Surface Water Monitoring Programme.	C	
8	P1.3	The following points referred to in the table [EPL Page 7 of 26] 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.	Documentation review	Soil, Water and Leachate MP, Dec 2011	C	The monitoring points are included in the SWLMP - Section 6.3 Surface Water Monitoring Programme.	C	
3: Limit Conditions								
	L1	Pollution of Waters						
9	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.	Visual inspection		C	There was no evidence to suggest that the project did not comply with Section 120 of the Act. No reportable environmental incidents have been reported to authorities.	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.	Visual inspection Document review	Soil, Water and Leachate MP, Dec 2011 (Hydraulic site plan) Site Water Infrastructure Management Work Instruction, June 2015 Invoices from Davcol Pty. Ltd. re cleaning of gross pollutant traps, 10 April 2014 & 30 April 2015	C	a) A Hydraulic Site Plan is included in the Soil, Water and Leachate management plan (last revised December 2011). b) The Onsite Stormwater Detention ponds were observed by the Auditor as well as stormwater treatment devices throughout the site covered by this EPL. The Auditor sighted invoices for the gross pollutant traps cleaning.	C	
	L2	Concentration Limits						
11	L2.1	For each monitoring/discharge point or utilisation area specified in the table below- Points 5,6,7,8 [EPL Page 8 of 26], 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 monitoring data	TBC	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.	NC	Ensure all sediment control measures or devices are actively maintained.

ENVIRONMENTAL PROTECTION LICENCE 20121 (RECYCLING / WASTE TRANSFER FACILITY, FORMALLY KNOWN AS THE MATERIALS PROCESSING FACILITY OR MPC) DATED 24 SEPTEMBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
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	EPL 20121 annual returns Surface water monitoring data	TBC	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.	NC	
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	N/A	C	Noted.	C	
14	L2.4	Water and/or Land Concentration Limits [Refer to table in EPL Page 8 of 26]	Document review	Surface water monitoring results	C	Limits are listed in the surface water monitoring results.	C	
	L3	Waste						
	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 [EPL Page 9 of 26 - Wood waste, Garden waste, Building and demolition waste, Waste tyres, Soils meeting GSW].				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
15	L3.1	Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below [EPL Page 9 of 26]	Visual inspection Document review	Timber Sales Report, February and January 2016 - Resource Recovery Exemption	C	The Auditor observed copies of customer invoices and separated product stockpiles on the site.	C	
	L3.2	No disposal or landfilling of waste may occur at the premises.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
16	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	Spotters Training Manual 2015 Rejected loads register (undated) Incoming products testing register	C	The Auditor did not identify wastes other than those permitted onsite during the inspection carried out on the 9 February 2016. Review of the spotters manual indicates systems are in place to identify and reject waste types that are not permitted. Incoming loads register indicates loads are tested regularly to ensure they are of suitable quality.	C	
17	L3.4	No asbestos waste is to be accepted or stored at the premises.	Visual inspection Document review	Spotters Training Manual 2015	C	Review of the spotters manual indicates systems are in place to identify and reject asbestos from the recycling facility.	C	
18	L3.5	Garden waste stockpiled on the premises shall not exceed 20,000 tonnes at any one time.	Visual inspection, staff interviews.	Volumetric surveys, through period 2013 to 2015	C	Garden waste was not observed on the site during the audit. The auditee advised the auditor that garden waste for composting is not currently accepted by the project.	C	
19	L3.6	Each individual wood waste stockpile both processed and unprocessed will be limited in size to < 2000 tonnes.	Visual inspection Document review (Periodic volumetric surveys.)	EPL 20121 - Volumetric surveys dated December 2013, June 2014, December 2014, June/July 2015	TBC	Volumetric survey report sighted indicated stockpiles of wood were higher than the limit of 2000 tonnes in December 2013 (ID no. SP3(5)).	NC	Continue to manage wood waste stockpiles to keep size below specified limit
20	L3.7	The authorised amount of waste permitted on the premises cannot exceed 667000 tonnes at any one time.	Document review	EPL 20121 - Volumetric surveys dated December 2013, June 2014, December 2014, June/July 2015	C	Review of biannual volumetric surveys showed total volumes of waste on site were below the limits.	C	
	L4	Noise Limits						
21	L4.1	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	Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes)	C	Compliance Noise Monitoring reports sighted for 2013 to 2015 indicate that noise levels did not exceed limits.	C	
22	L4.2	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	Document review	Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes)	C	Review of noise monitoring reports showed reference to these specifications.	C	
23	L4.3	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 sigma-theta method referred to in Part E4 of Appendix E to the NSW Industrial Noise Policy.	Document review	Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes)	C	a) Reports sighted for 2013 indicate that weather data from the Bureau of Meteorology Horsley Park site was used. b) Noise monitoring reports include reference to this method.	C	

ENVIRONMENTAL PROTECTION LICENCE 20121 (RECYCLING / WASTE TRANSFER FACILITY, FORMALLY KNOWN AS THE MATERIALS PROCESSING FACILITY OR MPC) DATED 24 SEPTEMBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
24	L4.4	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	Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes)	C	The reports were sighted and location of noise monitoring points were included in maps within the reports.	C	
25	L4.5	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.	Document review	Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes)	C	Noted - no exceedance reports were identified.	C	
26	L4.6	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.	Document review	Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes)	C	Review of noise monitoring reports showed reference to these specifications.	C	
	L 4.7	Noise monitoring must be conducted as per licence conditions with additional monitoring times to reflect the extended operating hours.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
	L5	Hours of Operation						
27	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	Weighbridge receipts (sample for one week).	C	A sample of weighbridge receipts indicates that waste loads were only received between the designated hours of operation.	C	
28	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 Visual inspection	Employee Timesheets (sample)	C	The hours of operation were observed by the Auditor on a sign at the front of the facility during the site inspection. A sample of employee timesheets in the period from August 2015 to February 2016 were also sighted showing hours completed within the timeframe.	C	
29	L5.3	Operating hours of the conveyor and chute system are restricted to the premises operational hours as specified in Condition L5.1.	Document review	Employee Timesheets (sample)	C	A sample of employee timesheets in the period from August 2015 to February 2016 were sighted showing hours completed within the timeframe.	C	
	L6	Potentially Offensive Odour						
30	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.	N/A	N/A	C	Noted.	C	
	L7	Other Limit Conditions						
31	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	-	C	a) Garden waste was not observed on the site. The auditee advised that garden waste is not currently accepted by the project. b) Observations of the timber yard on the 12 Feb 16 showed processed and unprocessed timber stockpiles were below the stipulated maximum height.	C	
32	L7.2	No stockpile at the premises is to exceed the height of the Amenity Berms at 10 meters.	Visual inspection	-	C	The auditor observed that the height of all stockpiles at the site were below the height of the amenity berms.	C	
4: Operating Conditions								
	O1	Activities must be carried out in a competent manner						
33	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	Staff training register / position descriptions (staff involved in the processing, handling, movement and storage of materials). Induction training manual	C	A site inspection was undertaken on 12 February 2016. All activities appeared to be carried out in a competent manner. The Site Induction Training Manual and staff training records were also sighted.	C	
	O2	Maintenance of plant and equipment						
	O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
	O3	Dust						

ENVIRONMENTAL PROTECTION LICENCE 20121 (RECYCLING / WASTE TRANSFER FACILITY, FORMALLY KNOWN AS THE MATERIALS PROCESSING FACILITY OR MPC) DATED 24 SEPTEMBER 2015								
Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
	O3.1	Maintain the premises in a condition which minimises dust emissions				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
34	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.	Visual inspection Document review	Air quality monitoring reports - quarterly (Pacific Environmental)	C	Minimal dust emissions were observed by the Auditor during the audit site visit of 12 February 2016; water sprinklers were present and functional where fine granular product was stockpiled. A water cart was observed wetting down surface roads. The auditor reviewed dust monitoring reports (Pacific Environmental Ltd, seven reports spanning 2013 to 2015. The reports did not indicate excessive dust was emitted from the site.	C	
35	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	N/A	C	Trucks entering the site were observed by the Auditor with covers during the site inspection on 12 February 2016.	C	
	O3.4	Ensure that stockpiles are kept wet during the transfer of waste to and from the stockpile and during processing				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
	O4	Emergency Response						
36	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	Emergency and Fire Response Plan, February 2011 Pollution incident response management plan, March 2015	C	The EFRP and PIRMP were sighted and a review indicates they contain provisions to reduce the likelihood of spills, dust and fire.	C	
	O5	Processes and management						
37	O5.1	Ensure waste that has been recovered has been stockpiled separately.	Visual inspection, identification and visual demarcation of separate product stockpiles	N/A	C	The Auditor observed separated stockpiles of product in the green waste and segregated materials areas.	C	
38	O5.2	The licensee must: 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.	Document review: verify the presence of an applicable MP	Pests, Vermin and Weeds MP, June 2011 Renotkil services invoice, 15 February 2016 Weeding schedule (Earth Repair Ecology, 9 June 2015) Weed invoices (Earth Repair and Restoration, June 2015 & Sydney Weed and Pest Management, 2013/14)	C	A review of the PVWMP indicates that suitable measures are in place to reduce the incidence of pests, vermin and weeds. The auditor sighted copies of past invoices for pest and weed control and a copy of the annual weeding schedule undertaken by weeding contractors.	C	
	O5.3	Procedures in place to minimise the risk of fire at the premises				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
	O5.4	The licensee must take all practicable steps to control entry to the premises.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
39	O5.5	The Licensee must not allow the tracking of waste and mud by vehicles leaving the premises.	Visual inspection	N/A	C	The auditor observed vehicles using the wheel wash prior to exiting the facility during the site visit on 12 Feb 16.	C	
40	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	Waste characterisation & classification report, DLA, 27 Oct 2015 Waste Classification Certificate, EIA, 29 Oct 2015	C	Waste certificates were sighted for waste entering the site.	C	
	O5.7	All stormwater and stormwater treatment devices (including drainage systems, sumps and traps) must be regularly maintained.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
	O6	Waste Management						
41	O6.1	The licensee must ensure that stockpiles of waste tyres are located in a clearly defined area.	Visual inspection Document review	Tyre management procedure, February 2016	C	Waste tyres were not observed on the site. A review of the tyre management procedure indicated that measures are in place to ensure tyre stockpiles are clearly defined.	C	
42	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.	Visual inspection Document review	Tyre management procedure, February 2016	C	Waste tyres were not observed on the site. A review of the tyre management procedure indicated that measures are in place to manage vermin.	C	

ENVIRONMENTAL PROTECTION LICENCE 20121 (RECYCLING / WASTE TRANSFER FACILITY, FORMALLY KNOWN AS THE MATERIALS PROCESSING FACILITY OR MPC) DATED 24 SEPTEMBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
43	O6.3	The licensee must ensure that measures are taken to prevent stockpiles of waste tyres from catching on fire.	Visual inspection Document review	Tyre management procedure, February 2016	C	Waste tyres were not observed on the site. A review of the tyre management procedure indicated that measures are in place to ensure tyre stockpiles do not catch fire.	C	
44	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	Tyre management procedure, February 2016	C	Waste tyres were not observed on the site. A review of the tyre management procedure found these requirements had been incorporated.	C	
45	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 Document review	Trade waste agreement, 1 April 2014 Leachate Collection Conveyance and Management System, June 2015 Green Waste Management Plan, June 2015	C	The landfill leachate holding tanks were observed during the site inspection. A copy of the Sydney Water trade waste agreement for disposal of leachate was sighted. A copy of the leachate management plan was sighted.	C	
46	O6.6	Leachate must not be irrigated and/or used for dust control at the premises.	Visual inspection of water cart filling, interview driver	N/A	C	The water cart was observed filling up from the filling station and wetting down road ways during the site inspection.	C	
47	O6.7	The Licensee must not cause or permit any leachate to pool at the premises.	Visual inspection of drainage infrastructure.	N/A	C	No pools of leachate were identified during the site inspection.	C	
48	O6.8	The Licensee must 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, interview staff in processing facility	Chute and Conveyor Management Procedure, June 2015	C	Review of procedures indicates that all asbestos waste is trucked down to the landfill facility. Interviews with facility staff confirmed that asbestos is not placed in the chute.	C	
49	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	Scale calibration certificates, Scale Calibration Pty Ltd. 23 January 2016	C	Valid scale calibration certificates were sighted for the weighbridge on site.	C	
	O6.10	The licensee must continuously operate video surveillance cameras at all weighbridges associated with the conveyor belt transfer system.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
50	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	N/A	C	The auditor observed four surveillance cameras in operation at the weighbridge. Photos from the surveillance footage were sighted.	C	
51	O6.12	There must be no incineration or burning of any waste at the premises	Visual inspection, staff interview	N/A	C	There was no evidence to suggest that any burning of waste at the premises has occurred.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
52	O6.14	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.	Visual inspection	N/A	C	Composting operations were not observed on the site. The auditee advised that garden waste for composting is not currently accepted by the project.	C	
53	O6.15	Each garden waste windrow must have an individual cover and aerobic equipment fitted to reduce odour and the generation of leachate.	Visual inspection	N/A	C	Garden waste was not observed on the site. The auditee advised that garden waste for composting is not currently accepted by the project.	C	
54	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.	Visual inspection	N/A	C	Concrete separation barriers were observed around the timber waste area.	C	
O7 Other Operating Conditions								
55	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 largest vessel; and - will contain all pressurised leaks or spills.	Visual Inspection	N/A	TBC	It is 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.	NC	Engineering or 'as built' plans should be provided to clarify the suitable construction of the leachate bunds.
56	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.	Visual Inspection	N/A	TBC	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.	NC	Engineering or 'as built' plans should be provided to clarify the suitable construction of the workshop bunds.
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
57	O7.4	The applicant must control pests and vermin at the premises.	Document review	Tax Invoices (Rentokil Pest Control February 2015 - February 2016)	C	The auditor sighted copies of pest control contractors invoices for control of mice.	C	
58	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	Training records Position description for Site Operations Manager Signed induction manual (sample)	C	The staff training register was sighted which includes asbestos training and spill response training. The induction manual includes environmental awareness components.	C	
59	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	N/A	C	The auditor observed vehicles using the wheel wash prior to exiting the facility during the site visit.	C	
5: Monitoring and Recording Conditions								
M1 Monitoring Records								
60	M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	N/A	N/A	C	Noted - see below.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
61	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	Surface water monitoring results, period 2012 to 2015 Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes) Air Quality Reports, multiple quarterly reports dated between 2013 to 2015 (Pacific Environment Ltd)	C	The noise monitoring reports were sighted and contained all required details of sampling undertaken. Surface water and ground water record details were mostly provided.	C	Future surface water records should include the sampler name and time sampling undertaken.
62	M1.4	The licensee must record the date, duration and volume of any leachate discharged to surface water.	Document review	N/A	C	The auditee advised that no leachate releases to surface water have occurred.	C	
M2 Requirement to Monitor Concentration of Pollutants Discharged								
63	M2.1	For each monitoring/discharge point or utilisation area specified in the tables 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. <a ir discharges>	Document review	Air Quality Reports, multiple quarterly reports dated between 2013 to 2015 (Pacific Environment Ltd)	C	Air quality monitoring reports sighted indicate that air pollutant levels did not exceed stipulated limits.	C	

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
64	M2.2	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	Air Quality Reports, quarterly reports dated between 2013 to 2015 (Pacific Environment Ltd)	C	Air quality monitoring reports sighted indicate that sampling has complied with the method, units and frequency of sampling.	C	
65	M2.3	Air Monitoring requirements [Refer to table in EPL Page 17 of 26]	Document review	As above	C	As above	C	
	M3	Testing Methods - Concentration Limits						
66	M3.1	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 Reports, multiple reports dated between 2013 to 2015 (Pacific Environment Ltd)	C	The reports refer to "Approved methods for the sampling and analysis of air pollutants in NSW" (DEC, 2005) which has been prepared under the POEO Act.	C	
	M4	Environmental Monitoring						
67	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	Weather station data (one week sample).	C	Weather station wind data at 15 minute intervals was sighted.	C	
	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.				See <i>Genesis Independent Environmental Audit, Appendix B - 21 August 2015.</i>		
	M5	Recording of Pollution Complaints						
68	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 Facility Complaints Register 2010 to 2015	C	The auditor sighted the complaints register with all recorded complaints updated monthly.	C	
69	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 Facility Complaints Register 2010 to 2015	C	The auditor sighted the complaints register with all specified details included in the most recent entries.	C	
	M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.				See <i>Genesis Independent Environmental Audit, Appendix B - 21 August 2015.</i>		
70	M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Document review	N/A	C	The auditee advised there has been no request for records to be produced to the EPA	C	
	M6	Telephone Complaints Line						
	M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.				See <i>Genesis Independent Environmental Audit, Appendix B - 21 August 2015.</i>		
71	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.	Website review	N/A	C	A complaints number is directly referenced on the DADI website.	C	
72	M6.3	The preceding two conditions do not apply until the date of the issue of this licence.	N/A	N/A	C	Noted	C	
	M7	Other Monitoring and Recording Conditions						

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
73	M7.1	<p><u>Soil Classification Records</u></p> <p>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:</p> <p>(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;</p> <p>(b) the quantity (in tonnes) of the Soil received;</p> <p>(c) the date and time that the Soil were received;</p> <p>(d) the registration number of the vehicle transporting the Soil to the premises;</p> <p>(e) the source(s) and address from where the Soil were received; and</p> <p>(f) the name and contact details of the company or individual delivering the Soil to the premises.</p> <p>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.</p>	Document review	Incoming load product testing register	C	The incoming load product testing register was sighted which included most of the required details.	C	Columns for quantity of soil received, time of receipt and vehicle registration should be included in the register.
74	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	Field Ambient Odour Assessment and Review Study, The Odour Unit, August 2015 Air Quality, Odour and Greenhouse Gas Management Plan, June 2015.	TBC	The FAOA study includes an assessment of AQOGGMP. However it is uncertain whether the recommendations for improvement have been considered or adopted. No other evidence of odour management audits or reviews for previous years was sighted.	NC	Consider recommendations of the Field Ambient Odour Assessment and Review Study, The Odour Unit, August 2015 to update the AQOGGMP.
6: Reporting Conditions								
	R1	Annual Return Documents						
75	R1.1	Annual return documents: 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	Annual Returns for 12/13, 13/14, 14/15	C	All annual returns have been submitted to the EPA for the reporting periods 12/13, 13/14 and 14/15. A statement of compliance monitoring and complaints summary were included.	C	
	R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
76	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").	Website review	EPA website	C	A review of the EPA's website indicated that the annual reports were received by the EPA within 2 months of the end of the reporting period.	C	
77	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	Annual Returns for 12/13, 13/14, 14/15	C	To date, the EPL has been active for 3 full years and copies of annual returns have been viewed for each year.	C	
78	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	EPL 20121: Annual Returns for 12/13, 13/14, 14/15	C	Statement of Compliance certified and signed by DADI Sole Director/ Secretary, Ian Makouf, as a person delegated to sign on behalf of the Company.	C	
	R2	Notification of Environmental Harm						
79	R2.1	Notifications must be made by telephoning the Environmental Line service on 131555. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Document review	N/A	C	The auditee advised there have been no incidents requiring notification to the EPA.	C	
80	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.	Document review	N/A	C	As above - no incidents	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
81	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.	Document review	N/A	C	As above - no incidents	C	
82	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.	Document review	N/A	C	As above - no incidents	C	
83	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.	Document review	N/A	C	The auditee advised there have been no fire events at the facility.	C	
	R3	Written Report						
84	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.	Document review	N/A	C	The auditee advised there have been no EPA requests for written report to date.	C	
85	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	N/A	C	As above - no request for written report to date.	C	
86	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.	Document review	N/A	C	As above - no request for written report to date.	C	
87	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.	Document review	N/A	C	As above - no request for written report to date.	C	

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
7: General Conditions								
	G1	General Conditions						
88	G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Document review	EPL 20121	C	A copy of the licence was sighted during the audit.	C	
89	G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Document review	N/A	C	There have been no requests for a copy of the licence	C	
	G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
8: Special Conditions								
	E1	Requirement to Maintain Financial Assurance						
90	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)	C	A copy of the Bankers undertaking was sighted.	C	
91	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.	Document review	Bankers Undertaking (15 May 2012)	C	The licence review has not yet been required	C	
92	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.	N/A	N/A	C	The auditee advised there have been no claims on the financial assurance	C	
93	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.	Document review	Bankers Undertaking (15 May 2012)	C	A copy of the Bankers undertaking was sighted.	C	
94	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.	N/A	N/A	C	The auditee advised there have been requests to increase the financial assurance	C	
95	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.	Document review	Bankers Undertaking (15 May 2012)	C	A copy of the Bankers undertaking was sighted by the auditor.	C	

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
	E2	Claims on Financial Assurance						
96	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.	N/A	N/A	C	The auditee advised there have been no claims on the financial assurance	C	
	E3	Environmental Obligations of Licensee (Works and Programs)						
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
97	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, March 2015 Emergency Evacuation Management Plan, February 2011	TBC	It is not clear what preventative measures would be undertaken to avoid potential pollution in an emergency.	NC	Suggest preparing a procedure to prepare the site in the event of an impending or ongoing emergency (e.g. earthquake, storm, fire, flood) to prevent pollution.
98	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.	N/A	N/A	C	Noted - future requirement	C	

GENESIS FACILITY INDEPENDENT ENVIRONMENTAL AUDIT



C = Compliant NC = Non-Compliant N/A = Not Applicable

ENVIRONMENTAL PROTECTION LICENCE 13426 (LANDFILLING OF GENERAL SOLID WASTE (NON-PUTRESCIBLE), TYRES AND ASBESTOS WASTE) DATED 6 OCTOBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
1: Administrative Conditions								
99	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.	N/A	N/A	C	Noted.	C	
100	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.	N/A	N/A	C	Noted.	C	
101	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.	N/A	N/A	C	Noted.	C	
102	A2.1	The licence applies to the following premises: Genesis Facility	N/A	N/A	C	Noted.	C	
103	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	N/A	N/A	C	Noted.	C	
2: Discharges to Air and Water and Applications to Land								
P1 Location of monitoring/discharge points and areas								
104	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.	Documentation review	Soil, Water and Leachate MP, Dec 2011	C	The utilisation areas are included in the SWLMP - Section 6.3 Surface Water Monitoring Programme and Appendix D.	C	
105	P1.2	The following points referred to in the table below [EPL Page 7 of 33] are identified in this licence for the purposes of monitoring and/or the setting of limits for discharges of pollutants to water from the point.	Documentation review	Soil, Water and Leachate MP, Dec 2011	C	The utilisation areas are included in the SWLMP - Section 6.3 Surface Water Monitoring Programme and Appendix D.	C	
106	P1.3	The following points referred to in the table below [EPL Page 10 of 33] are identified in this licence for the purposes of monitoring and/or the setting of limits for emission of noise from the point.	Documentation review	Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes)	C	These monitoring points are documented on maps in the noise monitoring reports.	C	
3: Limit Conditions								
L1 Pollution of Waters								
107	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.	Visual inspection Document review	-	C	There was no evidence to suggest that the project did not comply with Section 120 of the Act. No reportable environmental incidents have been reported to authorities.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
108	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	N/A	C	Depth indicators were observed in sediment ponds during the site audit.	C	
109	L1.4	Surface water must be diverted away from any area where waste is being landfilled.	Visual inspection	N/A	C	A lined stormwater containment pond was observed in the landfill site and which was partially full.	C	

ENVIRONMENTAL PROTECTION LICENCE 13426 (LANDFILLING OF GENERAL SOLID WASTE (NON-PUTRESCIBLE), TYRES AND ASBESTOS WASTE) DATED 6 OCTOBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
	L2	Concentration limits						
110	L2.1	For each monitoring/discharge point or utilisation area specified in the table 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 monitoring records / reports Ground water monitoring records / reports	TBC	Surface water monitoring results indicate that exceedances of the 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.	NC	Ensure all sediment control measures or devices are actively maintained.
	L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
111	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	N/A	C	Noted.	C	
112	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 millimeters over any consecutive five day period and the licensee has taken all practical measures to avoid or minimise water pollution.	N/A	N/A	C	Noted	C	
113	L2.5	Water and/or Land Concentration Limits [Refer to table in EPL Page 11 of 33]	Document review	Surface water monitoring results Ground water monitoring results	C	Limits were listed in the surface water monitoring and ground water monitoring results.	C	
	L3	Waste						
114	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 table in EPL page 12 of 33] Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.	Visual inspection Document review	Spotters Training Manual (May 2015). The Rejected Loads Register (undated). Incoming product testing register.	C	(a) The auditor did not identify wastes other than those permitted on the site during the site inspection (b) Review of the spotters manual indicates systems are in place to identify and reject waste types that are not permitted. (c) incoming loads are tested regularly to ensure incoming materials are of suitable quality.	C	
115	L3.2	The Licensee must not landfill more than 700, 000 tonnes of non-putrescible waste per calendar year.	Document review	Volumetric surveys June and Dec 2014, Dec 2015	C	Volumetric surveys to year ending Dec 2014 indicate less than stipulated amount of waste was sent to landfill.	C	
116	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	Spotters Training Manual (May 2015). The Rejected Loads Register (undated).	C	(a) The Auditor did not identify wastes other than those permitted on the site during the site inspection (b) Review of the spotters manual indicates systems are in place to identify and reject waste types that are not permitted.	C	
117	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	Spotters Training Manual (May 2015). The Rejected Loads Register (undated).	C	Review of the spotters manual and rejected loads register indicates systems are in place to identify and reject waste types that are not permitted.	C	
118	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"	Document review	The Rejected Loads Register (undated).	C	The rejected loads register with substance classification was sighted.	C	
	L4	Noise Limits						
119	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	Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes)	C	Compliance Noise Monitoring reports sighted concluded that noise levels did not exceed stipulated limits.	C	

ENVIRONMENTAL PROTECTION LICENCE 13426 (LANDFILLING OF GENERAL SOLID WASTE (NON-PUTRESCIBLE), TYRES AND ASBESTOS WASTE) DATED 6 OCTOBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
120	L4.2	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	Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes)	C	The reports were sighted and location of noise monitoring points were included in maps within the reports.	C	
121	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	Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes)	C	Compliance Noise Monitoring reports sighted for 2013 to 2015 indicate that noise levels did not exceed limits.	C	
	L5	Hours of Operation						
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
122	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 Visual inspection	Sample of employee timesheets through period August 2015 to February 2016	C	The facility hours of operation were observed by the Auditor on a sign at the front of the facility during the site inspection. A sample of employee timesheets were also sighted showing hours completed within the timeframe.	C	
	L6	Potentially offensive odour						
123	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	Document review	Field Ambient Odour Assessment and Review Study, The Odour Unit, August 2015	C	The Auditors review of the odour report findings indicated that minimal adverse odour impact was detected beyond the facility boundary.	C	
4: Operating Conditions								
	O1	Activities must be carried out in a competent manner						
124	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	Staff training register / position descriptions (staff involved in the processing, handling, movement and storage of materials). Induction training manual	C	A site inspection was undertaken on 12 February 2016. All activities appeared to be carried out in a competent manner. The Site Induction Training Manual and staff training records were also sighted.	C	
	O2	Maintenance of Plant and Equipment						
125	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.	Visual inspection Document review	Staff training records Plant and equipment maintenance records	C	Plant and equipment at the site was opportunistically observed by the Auditor to be in a good state of repair. Plant maintenance records were sighted by the Auditor.	C	
	O3	Dust						
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
126	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	N/A	C	Trucks entering the site were observed with covers during the site inspection on 12 February 2016.	C	
	O4	Processes and management						
127	O4.1	The licensee must take all practicable steps to control entry to the premises.	Visual inspection	N/A	C	The part of the site subject to this EPL was observed to be surrounded by a perimeter chain link fence and earthen bunds.	C	
128	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.	Document review: verify the presence of an applicable MP	Pests, Vermin and Weeds MP, June 2011 Rentokil services invoice, 15 February 2016 Weeding schedule (Earth Repair Ecology, 9 June 2015) Weed invoices (Earth Repair and Restoration, June 2015 & Sydney Weed and Pest Management, 2013/14)	C	A review of the plan (dated June 2011) indicates that suitable measures are in place to reduce the incidence of pests, vermin and weeds. The auditor sighted copies of past invoices for pest and weed control and a copy of the annual weeding schedule undertaken by weeding contractors.	C	

ENVIRONMENTAL PROTECTION LICENCE 13426 (LANDFILLING OF GENERAL SOLID WASTE (NON-PUTRESCIBLE), TYRES AND ASBESTOS WASTE) DATED 6 OCTOBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
129	O4.3	The Licensee must have in place and implement procedures to minimise the risk of fire at the premises.	Document review	Fire Safety Certificate (22 May 2012) Letter from Fire & Rescue NSW to DADI re compliance with project consent 16a (28 June 2011) Emergency Evacuation Management Plan, Feb 2011 EHS System Procedure - Minimising the Risk of Fire at the Premises and outlining the implementation and maintenance of Bushfire Asset Protection Zones on site	C	Review of the approved EEMP and EHS procedure indicates they contain provisions to reduce the likelihood of fires. A fire safety certificate for building fire safety measures at the site was also sighted.	C	
	O4.4	The Licensee must minimise the tracking of waste and mud by vehicles leaving the premises.				See Appendix B of Genesis Independent Environmental Audit - 21 August 2015.		
	O5	Waste management						
130	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 Interviews with staff.	Weighbridge receipts (sample for one week).	C	A sample of weighbridge receipts indicates that waste loads were only received between the designated hours of operation.	C	
	O5.2	There must be no incineration or burning of any waste at the premises.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
131	O5.3	The licensee must not exhume any landfilled waste at the premises unless written approval is given by the EPA.	Visual inspection	N/A	C	The auditee advised that no requests from the EPA have been submitted to DADI. Exhumed waste was not evident during the inspection.	C	
132	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	Photographs of virgin excavated natural material stockpiles in the landfill pit. Letter from EPA to DADI dated 23 December 2012 re proposed license variations	C	Photo evidence of VENM being applied to the face of the landfill was supplied by the auditee. A letter of approval for the use of an alternative daily cover from the EPA was also sighted.	C	
133	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, staff interview	Chute and Conveyor Management Procedure, June 2015	C	Review of procedures indicates that all asbestos waste is trucked down to the landfill facility. Interviews with facility staff confirmed that asbestos is not placed in the chute.	C	
134	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 inspection	N/A	C	Exposure of previously landfilled waste was not observed during the inspection.	C	
	O5.7	Landfill leachate must not be irrigated except as expressly permitted by a condition of this licence.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
135	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.	Visual inspection of green waste area	Trade waste agreement, 1 April 2014 Leachate Collection Conveyance and Management System, June 2015 Green Waste Management Plan, June 2015	C	The landfill leachate holding tanks were observed during the site inspection. A copy of the Sydney Water trade waste agreement for disposal of leachate was sighted. A copy of the leachate management system was also sighted	C	
136	O5.9	The licensee must only dispose of waste within the landfill void.	Visual inspection	N/A	C	No abandoned piles of waste were observed during the site inspection.	C	
137	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	Appendix J (Filling Plan) - Landfill Environmental Management Plan, 2 April 2015.	C	A copy of the filling plan dated within the past 12 months was sighted by the auditor.	C	
138	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.	Document review	Construction Quality Assurance Report on Basal Liner and Leachate Collection System (Douglas Partners, October 2012)	C	The Construction QA report for the basal lining was sighted.	C	
139	O5.12	Landfilling of waste and leachate levels must be managed to ensure the groundwater gradient directs groundwater flows inwards towards the landfill void.	Document review Visual inspection	Hydrogeological Investigation and Assessment (Douglas Partners, 2011)	C	Review of this report indicates suitable management measures for control of groundwater flows. Landfill leachate management equipment was observed during the site visit.	C	
140	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	Data logger records for leachate levels (sample 1 week)	C	Records sighted at 15 min intervals for monitoring points 26 and 27 indicate that groundwater levels are below the stipulated limits.	C	

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
141	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.	N/A	N/A	C	Noted. The landfill is currently below this level.	C	
142	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.	N/A	N/A	C	Noted. The landfill is currently below this level.	C	
143	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.	N/A	N/A	C	Noted. The landfill is currently below this level.	C	
144	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.	N/A	N/A	C	Noted. The landfill is currently below this level.	C	
145	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.	N/A	N/A	C	Noted. The landfill is currently below this level.	C	
146	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.	N/A	N/A	C	Noted.	C	
147	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.	N/A	N/A	C	Noted.	C	
148	O5.21	The final contours of the landfill must be in accordance with the approved Closure Plan.	N/A	N/A	C	Noted.	C	
	O6	Other operating conditions						
149	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.	Visual inspection	N/A	C	During site inspection the sequenced batch reactors and associated pipework for treatment of landfill leachate water was observed.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
	O6.3	The applicant must control pests and vermin at the premises.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
150	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 Position description for Site Operations Manager Signed induction manual (sample)	C	The staff training register was sighted which includes asbestos training and spill response training. The induction manual includes environmental awareness components.	C	
151	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.	Visual inspection	N/A	C	Compacted earthen bunds around the leachate tanks were observed during the site inspection.	C	
152	O6.6	The Proponent shall store all chemicals, fuels and oils used on site in an appropriately designed impervious banded 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.	Visual inspection Staff interviews	N/A	C	No chemicals, fuels or oils were observed on site during the inspection and interviews with staff indicate that no storage of these liquids occurs within the licence area.	C	
5: Monitoring and Recording Conditions								
	M1	Monitoring records						

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
153	M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Document review	EPL 13462 annual returns for 12/13, 13/14, 14/15	C	Annual returns were sighted for period from 2012 to 2015.	C	
154	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	Representative examples of air, surface water and groundwater monitoring records dating back up to four years from the audit date.	C	The Auditor sighted groundwater and surface water monitoring records dating from 2012 to 2016. The Auditor sighted a sample of air quality monitoring records dating back to 2013. All records were in a legible form. The auditee advised there has been no request for additional records to be produced to the EPA	C	
155	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	Surface water monitoring results, period 2012 to 2015 Ground water monitoring results, period 2012 to 2015 Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes) Air Quality Reports, multiple quarterly reports dated between 2013 to 2015 (Pacific Environment Ltd)	C	The noise monitoring reports were sighted and contained all required details of sampling undertaken. Surface water and ground water record details were mostly provided.	C	Future ground water and surface water records should include the sampler name and time sampling undertaken.
156	M1.4	The licensee must record the date, duration and volume of any leachate discharge to surface water.	-	-	C	Noted. The auditee advised that no leachate discharge events have been to recorded to date.	C	
M2 Requirement to monitor concentration of pollutants discharged								
157	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 EPL page 19 of 33]	Document review	Surface water monitoring records Ground water monitoring records	NC	Records indicate that the frequency of surface water sampling of the onsite detention basins in 2014 was not scheduled as required. It is noted that all sampling was undertaken as required since 2015.	NC	Continue to sample surface water at the specified frequency
158	M2.2	Water and/or Land Monitoring Requirements	Document review	As above	NC	As above	NC	As above
M3 Testing methods - concentration limits								
159	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.	Document review	Soil, Water and Leachate MP, 2011	C	Review of the MP indicates that relevant EPA guidelines are referenced in the monitoring programme.	C	
M4 Environmental monitoring								
	M4.1	Rainfall at the premises must be measured and recorded in millimetres per 24 hour period, at the same time each day.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
160	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	Weather station data (one week sample).	C	Weather station wind data at 15 minute intervals was sighted.	C	
161	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).	Document review	Soil, Water and Leachate MP, 2011	C	Review of the MP indicates that relevant EPA guidelines are referenced in the groundwater monitoring programme.	C	
162	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).	Document review	Soil, Water and Leachate MP, 2011	C	Review of the MP indicates that relevant EPA guidelines are referenced in the groundwater monitoring programme.	C	
M5 Recording of pollution complaints								
163	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 Facility Complaints Register 2010 to 2015	C	The auditor sighted the complaints register with all recorded complaints updated each calendar month.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
	M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		

ENVIRONMENTAL PROTECTION LICENCE 13426 (LANDFILLING OF GENERAL SOLID WASTE (NON-PUTRESCIBLE), TYRES AND ASBESTOS WASTE) DATED 6 OCTOBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
164	M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Document review	N/A	C	The auditee advised there has been no request for records to be produced to the EPA	C	
M6 Telephone complaints line								
165	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	N/A	C	J Peart telephoned complaints line 10/6/15 9.38am and spoke to a DADI staff member called Michael who requested details of the complaint.	C	
166	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.	Website review	N/A	C	A complaints number is directly referenced on the DADI website.	C	
167	M6.3	The preceding two conditions do not apply until either the date of the issue of this licence.	N/A	N/A	C	Noted.	C	
M7 Other monitoring and recording conditions								
168	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	Field Ambient Odour Assessment and Review Study, The Odour Unit, August 2015 Air Quality, Odour and Greenhouse Gas Management Plan, June 2015.	TBC	The FAQA study includes an assessment of AQOQGMP. However it is uncertain whether the recommendations for improvement have been considered or adopted. No other evidence of odour management audits or reviews for previous years was sighted.	NC	Consider recommendations of the Field Ambient Odour Assessment and Review Study, The Odour Unit, August 2015 to update the AQOQGMP.
169	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.	N/A	N/A	C	The auditee advised there has been no request for odour investigations by the EPA.	C	
170	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	Landfill Gas Monitoring Program, April 2015 Landfill Gas Monitoring Report, June 2015. Landfill Gas Monitoring Report, December 2015.	C	The LGMP makes reference to the relevant EPA guidelines. The LG Monitoring reports were sighted by the auditor.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
6: Reporting Conditions								
R1 Annual return documents								
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
171	R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Document review	EPL 13426 annual returns for 2012/13, 2013/14 and 2014/15	C	The Auditor sighted annual returns for 2012 - 2013, 2013 - 2014 and 2014 - 2015 for EPL 13426.	C	
172	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.	N/A	N/A	C	Noted. No licence transfer has occurred	C	
173	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.	N/A	N/A	C	Noted. The licence is still in force.	C	
174	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').	Website review	EPA website (epa.nsw.gov.au)	C	A review of the EPA's website indicated that the annual report for 2014/15 was received by the EPA within 2 months of the end of the reporting period.	C	
175	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	Annual Returns for 12/13, 13/14, 14/15	C	To date, the EPL has been active for 3 full years and copies of annual returns have been viewed for each year.	C	

ENVIRONMENTAL PROTECTION LICENCE 13426 (LANDFILLING OF GENERAL SOLID WASTE (NON-PUTRESCIBLE), TYRES AND ASBESTOS WASTE) DATED 6 OCTOBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
176	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	EPL 13426: Annual Returns for 12/13, 13/14, 14/15	C	Statement of Compliance certified and signed by DADI Sole Director/ Secretary, Ian Malouf as a person delegated to sign on behalf of the Company.	C	
	R2	Notification of environmental harm						
	R2.1	Notifications must be made by telephoning the Environmental Line service on 131555. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
177	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.	N/A	N/A	C	The auditee advised that no incidents requiring external reporting have occurred within the audit timeframe.	C	
178	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.	N/A	N/A	C	The auditee advised that no incidents requiring external reporting have occurred within the audit timeframe.	C	
179	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.	Document review	Letter from DADI to EPA re potential incident, 1 March 2013	C	A potential incident was reported to the EPA on 1 March 2013. The auditee advised that no other incidents have occurred.	C	
180	R2.5	The licensee must provide written details of any leachate discharge(s) referred to in Condition R2.4 to the EPA within 7 days of the date on which the incident occurred. The written details referred to in the above condition must be provided as a report. The report must include the following information: a) the volume of the leachate discharged and over what time period the discharge occurred; b) the date and time of the commencement of the overflow; c) the weather conditions at the time of the discharge, specifying the amount of rainfall on a daily basis that had fallen: - on the day(s) of the discharge; and - for the one week period prior to the discharge; d) the most recent monitoring results of the chemical composition of the leachate; e) an explanation as to why the discharge occurred; f) the location(s) of the discharge; and g) a plan of action to prevent a similar discharge in the future.	Document review	Letter from DADI to EPA re potential incident, 1 March 2013	C	As above - Letter to the EPA states that leachate was contained on the premises.	C	
181	R2.6	If the results of monitoring at Point 25 as required by Condition M2.2 indicate ammonia concentrations greater than 2mg/L and/or TOC exceeds 20mg/L, the licensee must contact the EPA within 24 hours and advise of the results of that monitoring.	Document review	Groundwater monitoring results	C	Noted. There have been no incidents requiring notification to the EPA.	C	

ENVIRONMENTAL PROTECTION LICENCE 13426 (LANDFILLING OF GENERAL SOLID WASTE (NON-PUTRESCIBLE), TYRES AND ASBESTOS WASTE) DATED 6 OCTOBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
182	R2.7	In the event of a fire at the facility the applicant must record: a) the time and date when the fire was deliberately started or reported; b) whether the fire was authorised by the applicant, 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 (eg. clean timber stockpile, putrescible garbage cell, etc.); 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.	Document review	None	C	The auditee advised there have been no fire events at the facility.	C	
7: General Conditions								
G1 Copy of licence kept at the premises or plant								
	G1.1	A copy of this licence must be kept at the premises to which the licence applies.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
183	G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Visual inspection	N/A	C	EPL 13426 is located in the site offices, sighted by the Auditor on 12th February 2016.	C	
8: Special Conditions								
	E1	Requirement to Maintain Financial Assurance						
184	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 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. (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. (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).	Document review	Acknowledgement of Receipt (21 August 2015) Banker's Undertaking (18th March 2012 and 29 October 2012)	C	A copy of the Bankers undertaking was sighted.	C	
185	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.	Document review	Banker's Undertaking (18th March 2012 and 29 October 2012)	C	A licence review period has not yet been required.	C	
186	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.	N/A	N/A	C	The auditee advised there have been no claims on the financial assurance.	C	
187	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.	Document review	Banker's Undertaking (18th March 2012 and 29 October 2012)	C	A copy of the Bankers undertaking was sighted.	C	

ENVIRONMENTAL PROTECTION LICENCE 13426 (LANDFILLING OF GENERAL SOLID WASTE (NON-PUTRESCIBLE), TYRES AND ASBESTOS WASTE) DATED 6 OCTOBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
188	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.	N/A	N/A	C	The auditee advised there have been requests to increase the financial assurance.	C	
189	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.	Document review	Acknowledgement of Receipt by Jennifer Rowe on behalf of EPA (21 August 2015)	C	The auditor sighted the acknowledgement of receipt of a bankers undertaking for \$400,000.	C	
	E2	Claims on Financial Assurance						
190	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.	N/A	N/A	C	The auditee advised there have been no claims on the financial assurance.	C	
	E3	Environmental Obligations of Licensee (Works and Programs)						
191	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	Pollution Incident Response Management Plan (DADI, March 2015) Oil spill clean-up procedure (undated) Incident reporting register	C	a) Review of the plan and procedure indicates that they contain measures to clean up oil spills. b&c) Noted. No direction issued by EPA for waste removal or request for data received.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
192	E3.3	After the licensee's premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must: a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; and b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination.	N/A	N/A	C	Noted - future requirement.	C	
	E4	Approved alternative daily cover specification - particulate waste materials						
193	E4.1	In accordance with condition O5.4 the Licensee may apply material as an alternative daily cover that meets the following criteria: a. The alternative daily cover must consist only of crushed concrete and/or crushed bricks and/or crushed clay tiles and/or crushed glass fines from domestic or commercial recycling collections, mixed with soil. The amount of soil in the mixture must be at least 25% (by mass). b. The alternative daily cover must be applied to a depth of at least 150mm at the close of each operational day. c. The alternative daily cover material must not contain contaminants at concentrations above those specified for General Solid Waste (Non-putrescible) in Tables 1 and 2 of the Waste Classification Guidelines, Part 1: Classifying Waste. d. The alternative daily cover material must not contain asbestos, food waste, animal waste, grease trap waste, biosolids, rubber, plastic, bitumen, asphalt, paper, cloth, paint, wood, other vegetable matter, plaster and metal. e. The maximum permissible dimension of particles is 50mm and 50% by mass of the material must be comprised of particles less than 1mm in diameter. Note: To meet all of the requirements in this approval, it is likely that the alternative daily cover will require processing into a fine particle size. f. The alternative daily cover material must have the ability to suppress odours from the landfilled waste and must not itself generate offensive odours. g. Rainwater which comes into contact with the alternative daily cover must be managed as landfill leachate.	Document review	Letter from EPA to DADI re approved alternate daily cover - concover (24 December 2012)	C	Cardno sighted a letter from EPA to DADI re approval of alternate daily cover material (concover).	C	
	E5	Installation of Stage 2 of Groundwater Monitoring Network						

ENVIRONMENTAL PROTECTION LICENCE 13426 (LANDFILLING OF GENERAL SOLID WASTE (NON-PUTRESCIBLE), TYRES AND ASBESTOS WASTE) DATED 6 OCTOBER 2015

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
194	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.	N/A	N/A	C	Noted. The landfill is currently below this level.	C	
195	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.	N/A	N/A	C	Noted. As above the landfill is currently below this level.	C	
196	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.	N/A	N/A	C	Noted. As above the landfill is currently below this level.	C	
E6 Alternative Daily Cover Trial								
197	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 EPA to DADI re approved alternate daily cover - concover (24 December 2012)	C	Cardno sighted a letter from EPA to DADI re approval of alternate daily cover material (concover).	C	
198	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	Concover Trial Report, ECS, 24 March 2016	C	The auditor sighted a copy of the concover report.	C	
199	E7.1	A. The Licensee must submit the following information to the EPA by 31 December 2013: A structural Pipe Loading Analysis Report that assesses the increased loading on pipework and leachate collection infrastructure, taking into account both landfilled waste and an additional 20m of leachate. The assessment must assess whether the following elements can withstand the additional downward pressures without their structural integrity or performance being compromised: i. the basal leachate collection pipework, and ii. the leachate extraction shaft. The report must include all supporting calculations and assessments and must be prepared by an engineer, such as a civil or geotechnical engineer, with qualifications acceptable to the Institution of Engineers Australia (or equivalent) and with experience in landfill design and construction.	Document review	Structural Pipe Loading Analysis Report 18 December 2013 (Cardno)	C	The report was sighted by Cardno and a review indicates it includes an assessment of the structural elements.	C	
200	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.	Document review	Genesis Zero Waste Facility: Field Ambient Odour Assessment and Review Study (The Odour Unit, August 2015)	C	The odour impact assessment was sighted by the auditor. It is noted that the report was completed after the required submission deadline.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		

GENESIS FACILITY INDEPENDENT ENVIRONMENTAL AUDIT



C = Compliant NC = Non-Compliant NA = Not Applicable

PROJECT APPROVAL 06_0139

Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
Schedule 2: Administrative Conditions								
201	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.	Opportunistic visual inspection	N/A	C	There was no evidence to suggest that the project was not minimising harm to the environment. No reportable environmental incidents have been reported to authorities.	C	
202	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; 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 'Land Partners' operational landform plan, 'Martens' report for stormwater management, and building elevations); and 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) conditions of this approval.	N/A	N/A	C	Requirement noted. These regulatory conditions are considered elsewhere.	C	
203	06_0139-2.2a	The construction of the buildings referred to in condition 8(a - c) are not approved, only the use of the buildings.	N/A	N/A	C	Noted.	C	
204	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.	N/A	N/A	C	Noted.	C	
205	06_0139-2.4	The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this approval; and b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.	N/A	N/A	C	Noted.	C	
	06_0139-2.5	The Proponent shall not receive more than 2 million tonnes of materials at the site per calendar year.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
206	06_0139-2.6	Nothing in this approval gives effect 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).	N/A	N/A	C	Noted.	C	
207	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.	N/A	N/A	C	Noted.	C	
208	06_0139-2.8	Prior to commencement of operations the Proponent shall obtain and provide copies of all necessary building certificates from Council to the Director-General, for the following works: a) the weighbridge and associated infrastructure; b) the amenities building adjacent to the MPC building; and c) the new administration/office building adjacent the car parking area.	Document review	Building Certificate No. 11-940 (28 May 2012) Compliance Certificates & Authority Signoffs - GMW Handover Manual Structural Construction Report - Conveyor Support Frame and Chute (Jones Nicholson, 3 April 2012) Structural Design and Construction Report - Existing Weighbridge (Jones Nicholson, 27 July 2011) Structural Design and Construction Report - existing open shed (Jones Nicholson, 27 July 2011) Compliance Report - Portable Office Buildings Development (Application Solutions, March 2012)	C	Building certificates and structural design reports were sighted for the required infrastructure and buildings	C	

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
209	06_0139-2.9	The Proponent shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the 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.	Document review	Construction certificate no. J090501 Construction certificate no. J090501A Construction Certificate No J090501A (MOD 3) Construction certificate no. J090501B Interim Occupation Certificate No J090501A	C	Required construction certificates were sighted.	C	
210	06_0139-2.9a	Construction works associated with the weighing silos, and conveyor and chute system shall be: a) the subject of appropriate certification from a qualified geotechnical and civil engineers; and b) in accordance with the relevant Australian Standards.	Document review	Letter from DoP to DADI re conveyor/chute system design plans and maintenance (Chris Ritchie, 13 December 2012) Interim Structural Construction Report - Conveyor Support Frame and Chute (Jones Nicholson, 12 December 2012) Structural Construction Report – Conveyor Support Frame and Chute (Jones Nicholson, 3 April 2012) Structural Design and Construction Report - Existing Weighbridge (Jones Nicholson, 27 July 2011)	C	Required construction reports were sighted.	C	
211	06_0139-2.9b	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.	Visual inspection.	N/A	C	Noted. No temporary structures observed on site.	C	
212	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.	Document review	DADI EHS Work Instruction dated March 2015: 1) Demolition by hand 2) Demolition by Machine	C	Demolition work instructions were sighted and included reference to the Australian Standards 2601.	C	
213	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.	Document review	Developer Compliance Certificate Case No. 119408 (1 June 2012) Section 73 Sydney Water Compliance Certificate Certificate of Compliance No. 1207383 - Electrical Work (3 September 2012)	C	Compliance certificate from Sydney Water and electrical compliance certificate were sighted.	C	
214	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.	Document review	Dilapidation Report, Old Wallgrove Road Eastern Creek for Dial a Dump Industries Pty Ltd Development Application No 06/0239 Part A (Global Projects, 6 October 2009) Dilapidation Report, Old Wallgrove Road Eastern Creek for Dial a Dump Industries Pty Ltd Development Application No 06/0239 Part B (Global Projects, 6 October 2009)	C	Dilapidation reports for public infrastructure were sighted.	C	
215	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.	Visual inspection Document review	Staff training records Plant and equipment maintenance records	C	Plant and equipment at the site was opportunistically observed by the Auditor to be in a good state of repair. Plant maintenance records were sighted by the Auditor.	C	
216	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.	N/A	N/A	C	Noted.	C	
217	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 the 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 Website review	Letter from DPI re approval of 12 management plans (5 December 2011) Letter from DPI re approval of EMS and SWLMP (23 December 2011). Letter of approval for post approval Traffic Management Plan and Code of Conduct by RTA (16 November 2010). DADI website (http://www.dadi.com.au/genesis-xero-waste-facility.html)	C	The auditor visited the DADI website - all documents displayed on the DADI website have been reviewed by relevant authorities prior to approval.	C	
218	06_0139-2.16	Where this approval requires the Proponent to submit a plan, strategy, study, or program to the Director-General or an agency for approval, the Proponent is required to obtain written approval from the Director-General or agency.	Document review	As above	C	As above	C	

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
Schedule 3: Specific Environmental Conditions								
WASTE								
219	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. Visual inspection	Volumetric surveys June and Dec 2014, Dec 2015 Spotters training manual, May 2015 Incoming loads register	C	Volumetric surveys to year ending Dec 2014 indicate less than stipulated amount of waste was sent to landfill. No tyre, putrescible or green waste was observed during the site inspection. Review of the spotters manual indicates systems are in place to identify and reject waste types that are not permitted. Incoming loads register indicates loads are tested regularly to ensure they are of suitable quality.	C	
	06_0139-3.2a	Implement suitable procedures to: - ensure that the site does not accept wastes that are prohibited; and - screen incoming waste loads.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
220	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.	N/A	C	Signs were observed at the entrance to the weighbridge station during the site inspection. The signs identified prohibited and accepted waste by the facility.	C	
221	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. <it is not anticipated that any trackable waste would be received>	Spotters training manual, May 2015 Incoming loads register	C	Review of the spotters manual indicates systems are in place to identify and reject waste types that are hazardous/ not permitted. Incoming loads register indicates loads are tested regularly to ensure they are of suitable quality.	C	
222	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.	Spotters training manual, May 2015 Training Records - Spotters Training Register Asbestos Management Plan, Feb 2014 Asbestos Guidelines (Genesis, 13 November 2013) EHS Work Instruction: Asbestos Removal and Hazardous Substances (Revised 31 March 2015) EHS Work Instruction: Procedure for Handling Asbestos Waste (Revised 31 March 2015) Dial A Dump Industries EMS Waste Monitoring Program [Facility Procedures] Issue 2 (5 November 2015) Page 10	C	Review of the spotters manual indicates systems are in place to identify and reject asbestos from the recycling facility. The Asbestos MP has been sighted includes reference to the NOHC Code of Practice for Asbestos in work places as well as the POEO regulations and Workcover NSW legislation.	C	
223	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, interview staff in processing facility	Chute and Conveyor Management Procedure, June 2015	C	Review of procedures indicates that all asbestos waste is trucked down to the landfill facility. Interviews with facility staff confirmed that asbestos is not placed in the chute.	C	
224	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	Spotters Training Manual (May 2015). The Rejected Loads Register (undated).	C	(a) The Auditor did not identify wastes other than those permitted on the site during the site inspection (b) Review of the spotters manual indicates systems are in place to identify and reject waste types that are not permitted.	C	
225	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.	EMS Waste Monitoring Program,[Facility Procedures] July, 2010	C	A Waste Monitoring Program was sighted by the Auditor.	C	
LANDFILL CONSTRUCTION AND OPERATION								
226	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 EPA and submitted to the Director-General for approval prior to construction commencing.	Document review.	Construction Quality Assurance Report on Basil Liner and Leachate Collection System (Douglas Partners, October 2012)	C	The Construction QA report was sighted by the Auditor.	C	

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
227	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.	Document review.	Geotechnical Quarry Slope Stability Assessment Report (Jeffery and Katauskas Pty Ltd, 17 March 2008) Email from Jeffery and Katauskas to DADI re Geotechnical Advice (4 April 2013) Email from Jeffery and Katauskas to DADI re Geotechnical Advice (6 May 2013)	C	The Auditor sighted the report and copies of emails with the contractor regarding ongoing management of landslip risks. Results and discussion of the landslip monitoring are included in the Environmental Review 2014.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
228	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. Document review	Photograph of VENM stockpiles in the landfill area.	C	Observations during the site visit indicated only relatively small areas of active landfill areas. VENM used for daily covering of landfill waste seen in photographs provided by the auditee.	C	
229	06_0139-3.10	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 EPA 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.	Document Review	EMS Leachate Collection, Conveyance and Management System - Former Quarry Site at Old Wallgrove road, Eastern Creek Materials Processing Centre (MPC) Waste Transfer Facility associated with an adjacent Proposed Solid Waste Landfill (DADI Group Pty Ltd, March 2015). Letter from DPI providing consent to Leachate MS (5 December 2011)	C	The Auditor sighted the EMS Leachate Management System prepared for the site and revised in March 2015. The approval letter from DPI re the LMS has also been sighted.	C	
230	06_0139-3.11	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.		Construction Quality Assurance Report on Basal Liner and Leachate Collection System (Douglas Partners, October 2012) Consent to Discharge Industrial Trade Wastewater Consent No. 35580 (1 April 2014) Consent to Discharge Industrial Trade Wastewater Consent No. 35580 (20 May 2013) Consent to Discharge Industrial Trade Wastewater Consent No. 35580 (3 July 2012) Consent to Discharge Industrial Trade Wastewater Consent No. 35580 (18 April 2009) M300 Flowmeter field verification certificate no. JTM070814 (7 August 2014) Commercial and Industrial Customer Services Trade Waste Inspection Compliance Report No. 19605 (8 July 2015) Business Customer Services Trade Waste Inspection Compliance	C	The Auditor has sighted the Construction Quality Assurance Report which indicates that the leachate collection system has been constructed. The leachate treatment storage tanks and associated pipework's were observed by the auditor during the site inspection. Previous and the current trade waste agreement consent between Sydney Water Corporation and DADI Pty Ltd were sighted by the Auditor.	C	
231	06_0139-3.12	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 EPA/EPA.	Visual inspection.	N/A	C	Composting operations were not observed on the site. The auditee advised that garden waste for composting is not currently accepted by the project.	C	

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
232	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.	Weekly Roster for the Eastern Creek Litter Pick up (Genesis, undated).	C	No litter along fence lines or on vegetation was observed during the site visit. The weekly litter roster for the site was sighted by the Auditor. All vehicles entering the site were observed to be covered and unloaded inside the MPC facility.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
233	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.	Visual inspection	N/A	C	The Auditor observed the perimeter fence in a good state of repair and gates were padlocked to prevent unauthorised site access.	C	
234	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.	Letter from Fire & Rescue NSW to DADI re compliance with 16a (28 June 2011) Emergency Evacuation Management Plan, First 5 Minutes, 2 February 2011	C	The Auditor sighted a copy of a letter from Fire & Rescue NSW that advised of the Emergency Evacuation MP's compliance with condition 16a. The Auditor observed fire extinguishers and fire hoses within the MPC facility and administration building. Review of the EEMP indicates it contains provisions for emergency evacuation.	C	
235	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.	Document review.	Letter from Planning and Infrastructure to DADI (Chris Ritchie, 13 December 2012)	C	The Auditor sighted a copy of a letter from Planning and Infrastructure to DADI advising of compliance with condition 16a & 16b	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
SOIL, WATER AND LEACHATE MANAGEMENT								
236	06_0139-3,17	Except as may be expressly provided in an EPL for the project, the Proponent shall comply with Section 120 of the POEO Act.	Visual inspection	N/A	C	There was no evidence to suggest that the project did not comply with Section 120 of the Act. No reportable environmental incidents have been reported to authorities.	C	
237	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. 35580 to Discharge Industrial Waste (Sydney Water, 1 April 2014) Consent No. 35580 to Discharge Industrial Waste (Sydney Water, 3 July 2012) Consent No. 35580 to Discharge Industrial Waste (Sydney Water, 3 July 2012) Consent No. 29304 to Discharge Industrial Waste (Sydney Water, 18 April 2009)	C	Previous and the current trade waste agreement consent between Sydney Water Corporation and DADI Pty Ltd were sighted by the Auditor.	C	

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
238	06_0139-3.19	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 DP 241859, or the construction of the Precinct Plan Road that will eventually traverse Lot 10 DP 241859.	Document review.	Deed dated 27 June 2011 between Sumy Pty Ltd and TheQuarry Pty Ltd and CAN 114 843 453 and Australand Holdings Ltd Permit Application for plumbing and drainage work (Blacktown Council, 16 April 2012) Licensee's Certificate of Compliance for Plumbing and Drainage Work (Blacktown Council, 16 April 2012) Developer Compliance Certificate Case No. 119408 (1 June 2012) Letter re Sewer Connection (11 May 2009) Letter of Approval of a Sydney Water Asset (21 May 2009)	C	Approval letter for extension of the sewer from Sydney Water was sighted by the auditor	C	
239	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.	N/A	TBC	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.	NC	Engineering or 'as built' plans should be provided to clarify the suitable construction of the workshop bunds.
240	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	Letter from DECCW to DADI re compliance with condition 21 – soil, water and leachate management plan (28 September 2010)	C	A letter from the DECCW re compliance with this condition was sighted by the Auditor.	C	
241	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 (last revised December 2011)	C	A Hydraulic Site Plan was sighted as an appendix to the Soil, Water and Leachate MP.	C	
242	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	Site Surface Water Management Plan, Storm Consulting, November 2008	C	The Auditor sighted a copy of the MP. A review of the adequacy of the MP content is outside the scope of this audit	C	
243	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.	Document review	Appendix C: Martens Consulting Engineers (2011) Consolidated Stormwater Management Plan Civil Stormwater Drainage Plan (Complete Urban, 12 August 2011)	C	The Auditor sighted a copy of the Stormwater MP which includes reference to the DEC handbook and includes a stormwater site plan in appendix A	C	
		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. 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 1 below. 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. d) The design rainfall data used in the hydrologic calculations must be in accordance with Council's current Engineering Guide for Development. 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.						

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Audites Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
244	06_0139-3,25	<p>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.</p> <p>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 is prepared.</p> <p>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.</p> <p>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.</p> <p>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 redevelopment 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.</p> <p>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.</p>	N/A	N/A	C	Noted. Future requirement.	C	
245	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.	N/A	N/A	C	Noted. Future requirement.	C	
	06_0139-3,26	Deleted.						
246	06_0139-3,27	<p>The surface water, groundwater, and leachate monitoring program must:</p> <p>a) be generally consistent with the guidance in benchmark techniques 4, 5, 6, 7 and 8 of Appendix A of the EPA's Environmental Guidelines for Solid Waste Landfills (1996, or the relevant sections of the latest version of the guideline); and</p> <p>b) include:</p> <ul style="list-style-type: none"> - 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	<p>Soil, Water and Leachate management plan (last revised December 2011)</p> <p>Groundwater Monitoring Plan (IGGC, March 2012)</p>	C	The Auditor sighted sections of the approved SWLMP and Groundwater Monitoring Plan where these requirements are referenced.	C	
247	06_0139-3,28	<p>The surface water, groundwater and leachate response plan must:</p> <p>a) include a protocol for the investigation, notification and mitigation of any exceedances of the respective trigger levels; and</p> <p>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.</p>	Document review	<p>Soil, Water and Leachate management plan (last revised December 2011)</p> <p>Groundwater Monitoring Plan (IGGC, March 2012)</p>	C	The Auditor sighted sections of the approved MP where these requirements are addressed.	C	SWLMP and GMP should include reporting to EPA requirements for any exceedances.

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations	
AIR ODOUR AND GREENHOUSE									
248	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	Genesis Recycling Facility Compliance Air Quality Monitoring (Pacific Environment Ltd, July-September 2015) Genesis Recycling Facility Compliance Air Quality Monitoring (Pacific Environment Ltd, April-June 2015) Genesis Recycling Facility Compliance Air Quality Monitoring (Pacific Environment Ltd, January-March 2015) Genesis Recycling Facility Compliance Air Quality Monitoring (Pacific Environment Ltd, October-December 2014) Genesis Recycling Facility Compliance Air Quality Monitoring (Pacific Environment Ltd, July-September 2014) Genesis Recycling Facility Compliance Air Quality Monitoring (Pacific Environment Ltd, December 2013-March 2014) Genesis Recycling Facility Compliance Air Quality Monitoring (Pacific Environment Ltd, March-November 2013) Genesis Recycling Facility Compliance Air Quality Monitoring (Pacific Environment Ltd, March-August 2013) Genesis Recycling Facility Compliance Air Quality Monitoring (Pacific	C	The Auditor sighted the air quality monitoring reports undertaken. The results indicated no exceedances of dust criteria have occurred up to the Q3 2015.	C		
249	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	Field Ambient Odour Assessment and Review Study, The Odour Unit, August 2015	C	The Auditors review of the odour report findings indicated that minimal adverse odour impact was detected beyond the facility boundary.	C		
250	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.	N/A	N/A	C	The auditee advised that no recommendation for enclosure of green waste area has been received by DADl	C		
251	06_0139-3.31a	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.	Visual inspection	N/A	C	Garden waste was not observed on the site. The auditee advised that garden waste for composting is not currently accepted by the project.	C		
	06_0139-3.32	The Proponent shall implement all reasonable and feasible measures to minimise the dust generated by the project.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.			
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.			
252	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	N/A	C	The Auditor observed water sprinklers and sprays in the product stockpile area during the site visit of 12 February 2016. Water sprinklers were observed in the screening plant and a water cart was also observed wetting down surface roads.	C		
253	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.	Visual inspection	N/A	C	Trucks entering the site were observed by the Auditor with covers during the site inspection on 12 February 2016. Vehicles were also observed using the wheel wash when exiting the facility.	C		
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.			
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.			
NOISE									
	06_0139-3.38	The Proponent shall ensure that noise from the project does not exceed the noise limits in Table 4 (36dB(A))				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.			
254	06_0139-3.39	The Proponent shall comply with the restrictions in Table 5	Document review Visual inspection	Sample of employee timesheets through period August 2015 to February 2016	C	The facility hours of operation were observed by the Auditor on a sign at the front of the facility during the site inspection. A sample of employee timesheets were also sighted showing hours completed within the timeframe.	C		

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
255	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 Visual inspection	Sample of employee timesheets through period August 2015 to February 2016	C	As above	C	
256	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 Visual inspection	Sample of employee timesheets through period August 2015 to February 2016	C	As above	C	
257	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.	Document review Visual inspection	Sample of employee timesheets through period August 2015 to February 2016	C	As above	C	
	06_0139-3.40	The Proponent shall prepare and implement a Noise Monitoring Program for the development, in consultation with EPA, 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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
METEOROLOGICAL MONITORING								
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
TRAFFIC, TRANSPORT & ACCESS								
258	06_0139-3.42	Access to the Project from Archbold Road is not permitted	Visual inspection	N/A	C	No access road to/from Archbold road was observed by the Auditor during the inspection.	C	
259	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	N/A	C	Access via Wonderland Drive was observed by the Auditor	C	
260	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.	Document review	Design Plan for Precinct Road, Draft (undated).	C	Noted. The Precinct Road is still under planning with other affected Landowners Hanson and Australand and Blacktown City Council.	C	
261	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.	Document review	Design Plan for Precinct Road, Draft (undated).	C	As above	C	
262	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.	Document review	Design Plan for Precinct Road, Draft (undated).	C	As above	C	
263	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.	Document review Visual inspection	DADI EMS Traffic and Transport Code of Conduct (31 March 2015)	C	Reference to AS2890 was noted during review of the Code of Conduct. The Auditor observed spaces for parking and disabled parking in accordance with the requirements.	C	
264	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.	Document review Visual inspection	DADI EMS Traffic and Transport Code of Conduct (31 March 2015)	C	The Auditor did not observe any traffic queuing on the public roads during the site inspection.	C	
265	06_0139-3.49	a) By 22 November 2014, the Proponent shall contribute toward the acquisition, design and construction of the Precinct Plan Road know as 'Quarry Link Road' between Old Wallgrove Road and Wonderland Drive and Bridge B1 forming part of the Quarry Link Road. b) The contribution shall be the amount set out in the Table below or as approved by the Director-General under paragraph c, whichever is the lesser. c) The final contribution payable by the Proponent under this Condition 49 shall be subject to approval of the Director-General. The Director-General's consideration of an appropriate level of contribution shall be on the basis of a costs base date of March 2010 and considers: i) the level of contribution made by all other landowners within the Eastern Creek Precinct Plan; ii) the level of contribution against the Land Acquisition (Just Terms Compensation) Act 1991; iii) a independent verification from a quantity surveyor on the cost of the works, whose appointment has been approved by the Director-General; iv) the level of contribution against the Total Operational Area of the project (See Appendix 3); v) any submissions made by the Proponent or Council in relation to the contribution. d) The contribution is to be indexed in accordance with the following formula: = \$C _c x CPI (at time of payment)	Document review	Design Plan for Precinct Road, Draft (undated).	C	Noted. The Precinct Road is still under planning and discussion with other affected Landowners Hanson and Australand and Blacktown City Council.	C	

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
266	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.	Document review	Proposal for Planning Agreement (24 June 2009) Planning Agreement (11 April 2012)	C	The Auditor sighted a copy of a Planning Agreement between Thaquarry Pty Ltd. and the Minister for Planning and Infrastructure.	C	
267	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	Letter from RTA to DPI re post approval management plan and traffic and transport code of conduct (Owen Hodgson, 16 November 2010) Letter from DPI providing consent to Traffic and Transport Code of Conduct (5 December 2011)	C	The Auditor sighted copies of correspondence with the RTA and DPI regarding consultation and final approval of the Transport Code of Conduct. A review of the Code of Conduct indicates it contains measures to address minimise traffic impacts.	C	
VISUAL AMENITY								
268	06_0139-3.52	The Proponent shall ensure that the lighting associated with the project: 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 that it does not create a nuisance to surrounding properties or the public road network.	Document review	Lighting Plan - Version 4, January 2011 Letter to DADI from Robert Smith - Electrical, 29 March 2016	C	Lighting Plan and letter from Robert Smith re compliance with AS 4282 were sighted by the auditor	C	
269	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.	Document review	Dial a Dump Industries EMS Amenity Berms Management Plan (July 2011 and Revised 31 March 2015) Letter from DPI providing consent to Amenity Berms Management Plan (5 December 2011)	C	The Auditor sighted copies of the MP and approval from the DPI.	C	
	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 site 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 required to reshape the amenity berms on site, without impacting on adjoining landowners.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
270	06_0139-3.55	No stockpile on site should exceed the height of the berms, impervious barriers or visual screens.	Document review Visual inspection	Dial a Dump Industries EMS Amenity Berms Management Plan (July 2011 and Revised 31 March 2015)	C	Stockpiles observed during the site inspection were in compliance with the height restrictions.	C	
271	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.	Document review	Dial A Dump Industries EMS Fencing and Security Plan (June 2011 and Revised 31 March 2015) Letter of Approval from DPI (5 December 2011)	C	The Auditor sighted copies of the Plan and approval from the DPI.	C	
272	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	N/A	C	The Auditor observed the perimeter fence adjacent to the conservation area was in good condition and gates were locked to prevent access. No evidence of disturbance was apparent.	C	
FLORA AND FAUNA ASSESSMENT								
273	06_0139-3.58	The Proponent must comply with Clean up notices issued by the Environment Protection Authority to the Proponent in relation to creek rehabilitation and reinstatement work within Lot 2 DP 262213.	N/A	N/A	C	Noted. A notice from the EPA has not been issued.	C	
274	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.	Document review	Dial a Dump Industries EMS Landscape and Vegetation Management Plan (June 2011) Letter of approval from DPI for Landscape and Vegetation Management Plan (5 December 2011)	C	The Auditor sighted copies of the Plan and approval from the DPI.	C	
HERITAGE								
275	06_0139-3.60	The Proponent shall not disturb those areas identified as High Sensitivity in McDonald 2005.	Visual inspection	N/A	C	The Auditor observed the perimeter fence adjacent to the conservation area was in good condition and gates were locked to prevent access. No evidence of disturbance was apparent.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
Schedule 4: Rehabilitation and Closure								
276	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.	N/A	N/A	C	Noted. Future requirement.	C	
277	06_0139-4.2	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 EPA, 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 Environmental Management Plan, March 2015.	NC	The LEMP, Section 6.5 - Proposed Approach to Site Closure and Rehabilitation - sets out planning measures for site closure and rehabilitation. It is not clear if the LEMP has been submitted to the EPA or Council for consultation.	NC	Submit LEMP to EPA and Council for comment.
Schedule 5: Environmental Management, Reporting & Auditing								
ENVIRONMENTAL MANAGEMENT								
278	06_0139-5.1	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 area.	Document review	EMS Incorporating CEMP Stage 2(B) and OEMP (November 2011) Letter of approval from DPI for Environmental Management Strategy (23 December 2011)	C	The Auditor sighted a copy of the EMS and DPI approval letter.	C	
279	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.	Document review	Letter of approval from DPI (5 December 2011) Letter of approval from DPI (23 December 2011)	C	All management plans and monitoring programs required in the Project Approval have been approved by the Director General. Approval was granted in letters dated 05/11/11 and 23/12/11	C	

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Item	Condition	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
280	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 • the relevant statutory requirements, limits or performance measures/criteria; • the monitoring results of previous years; and • the relevant predictions 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.	Document review	2014 Annual Environment Review – Genesis Xero Waste Recycling & Landfilling Facility 2015 Draft Annual Environment Review	C	Copy of the 2014 annual report and a draft 2015 report were sighted by the Auditor	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
REPORTING								
281	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.	Document review		C	The auditee advised that no notifiable incidents have occurred at the site.	C	
282	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.	Website review		C	The Auditor visited the DADI website www.dadi.com.au on the 3 March 2016 and viewed monitoring records for the environmental performance of the facility.	C	
INDEPENDENT ENVIRONMENTAL AUDIT								
	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.						
283	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.	Document review	Letter from DADI to DPI providing a copy of the Audit undertaken in 2012 (21 March 2013).	TBC	A copy of the letter from DADI to DPI was sighted by the Auditor. It is not clear if any response to the recommendations was provided.	NC	
ACCESS TO INFORMATION								
284	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.	Website review	DADI website (www.dadi.com.au)	C	The Auditor visited the DADI website on the 3 March 2016 and viewed the majority of the required documents.	C	Note: Copies of past independent audits with DADI's responses were not found on the website on 3 March 2016.

GENESIS FACILITY INDEPENDENT ENVIRONMENTAL AUDIT



*C = Compliant NC = Non-Compliant N/A = Not Applicable

LIGHT HORSE BUSINESS CENTRE VOLUME 1: ENVIRONMENTAL ASSESSMENT REPORT (ERM 2008), DRAFT STATEMENT OF COMMITMENTS

Item	Commitment	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
3: Construction and Operation EMP								
	3	A Construction Environmental Management Plan (CEMP) and an Operational Environmental Management Plan (OEMP) will be developed and approved by the Director - General				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
5. Operational Environmental Performance								
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
285	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 (Selection of tests ranging from January 2013 – November 2015)	C	Monitoring results for the OSD basins were sighted for the period from start of 2013 to end of 2015. Auditee advised that pit stormwater is reused for dust suppression on site and not discharged.	C	
286	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	Gross Pollutant Trap cleaning invoice (Davcol Pty. Ltd, 30 April 2015) Stormwater drainage maintenance work instruction (February 2016)	C	Invoices were sighted for cleaning of gross pollutant traps and a copy of the stormwater drainage maintenance work instruction (February 2016)	C	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.
287	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 Visual inspection	Gross Pollutant Trap cleaning invoice (Davcol Pty. Ltd, 30 April 2015) Stormwater drainage maintenance work instruction (February 2016)	C	Invoices were sighted for cleaning of gross pollutant traps and a copy of the stormwater drainage maintenance work instruction (February 2016). Depth indicators on storage dams were sighted during the audit inspection	C	
288	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	N/A	C	No diesel fuel tanks were observed near the workshop or in areas covered under this assessment.	C	
289	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.	Visual inspection (graded bunded areas, backup containment, spill kits). Document review - staff training.	DADI Oil Spill/Fuel/As-Blue Clean up Procedure (undated) Training records of spill clean up procedure (undated)	C	Bunding was observed under all chemicals stored on site. Spill kits were observed around chemical storage areas. Training records for spill clean up training was observed for staff trained on 26 July 2015.	C	
290	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.	Document Review	Letter from DECCW to DADI re compliance with condition 21 – soil, water and leachate management plan (Rob Hogan, 28 September 2010)	C	A copy of the DECCW approval letter for the Soil, Water and Leachate Management Plan was sighted during the Audit.	C	
291	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 reduced to every 6 months throughout the life of the Landfill and RRF. Visual inspection shall also occur preceding significant rainfall events. Submission of water quality monitoring results shall be submitted to the relevant authority as required by the EPL.	Document Review	Groundwater monitoring results Annual Return 2013/14 and 2014/15	C	Groundwater quality monitoring results for leachate monitoring points are included in the annual returns submitted under EPL 13426	C	
292	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	Letter from ECS dated 25 February 2016 re clogged monitoring point	C	A letter from a consultant advising DADI of a blocked leachate monitoring well was sighted during the audit	C	

LIGHT HORSE BUSINESS CENTRE VOLUME 1: ENVIRONMENTAL ASSESSMENT REPORT (ERM 2008), DRAFT STATEMENT OF COMMITMENTS

Item	Commitment	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
293	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 Visual inspection.	Monitoring reports - quarterly (Pacific Environmental)	C	The auditor reviewed dust monitoring reports (Pacific Environmental Ltd, seven reports spanning 2013 to 2015. The reports did not indicate excessive dust was emitted from the site.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
294	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	Dial A Dump Industries EMS Air Quality Odour and Greenhouse Gas Management Plan (June 2011)	C	The AQOGG MP was reviewed by the auditor and was found to include procedures for monitoring landfill gas.	C	
295	5.4.2	Monitoring shall also include recording of odour observations including the monitoring of BioMagic key odour sources to minimise emissions.	Document Review	Field Ambient Odour Assessment and Review Study, The Odour Unit, August 2015	C	Garden waste was not observed on the site during the audit. The auditee advised that garden waste for composting is not currently accepted by the project and therefore biomagic has not been utilised on site.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
296	5.5.1	On-site plant and equipment are to be properly maintained to ensure rated noise emission levels are not exceeded.	Document Review	Plant Inspection and Daily Report dated 10 February 2015, 21 October 2014 and 12 May 2014 Repairs Jobcard 2 dated 12 May 2014	C	Inspection reports and repair job cards were sighted by the auditor.	C	
297	5.5.2	With the application of reasonable and feasible mitigation, operational noise levels at residences will not exceed 55dB(A)Leq,15min.	Document Review	Dial A Dump Industries EMS Noise Monitoring Program (June 2011) Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes)	C	Compliance Noise Monitoring Assessments sighted for 2013 to 2015 indicate that noise levels did not exceed stipulated limits.	C	
298	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.	N/A	C	Signs with the telephone number were observed on the entry gate.	C	
	5.5.4	A log of noise complaints will be maintained and actioned in a responsive manner.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
299	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	Weighbridge receipts (sample for one week).	C	A sample of weighbridge receipts indicates that waste loads were only received between the designated hours of operation.	C	
300	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.	Visual inspection.	N/A	C	Observations from around the MPC and landfill indicated that internal roads were in a good state of repair.	C	
301	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.	N/A	C	The auditor did not observe any excessive reflective colours on the site.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
	5.7.3	LHBC will maintain building elements using muted colours which blend into the surrounding natural environment.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
302	5.7.4	The site 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. Document review	Various Volumetric surveys of landfill for license No. 13426 and 20121 dated 2013 - 2015 with photograph displaying numbered stockpiles Dial A Dump Industries EMS Traffic and Transport Code of Conduct (June 2011)	C	Observations from around the Materials Processing Facility and landfill indicate that the site is maintained in an orderly manner.	C	
303	5.7.5	LHBC shall maintain landscaped areas on site throughout operations.	Visual inspection.	N/A	C	Landscaping observed on site appeared to be well maintained.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
304	5.8.2	Provide and maintain Asset Protection Zones (APZs)	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	C	Emergency Response Procedures and EHS system procedure were sighted.	C	

LIGHT HORSE BUSINESS CENTRE VOLUME 1: ENVIRONMENTAL ASSESSMENT REPORT (ERM 2008), DRAFT STATEMENT OF COMMITMENTS

Item	Commitment	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
305	5.8.3	Emergency Response Procedures including evacuation procedures shall be developed for the occurrence of a fire.	Document Review	Genesis MPC Plant Fire and Emergency Directions (March 2012) Dial A Dump Industries Pty Ltd Emergency Evacuation Response Plan (2 February 2011)	C	The Emergency Response Procedures were sighted.	C	
306	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 Report to LHBC on Preliminary Geotechnical Assessment for Proposed Development (J&K, 18 May 2007) Geotechnical Quarry Slope Stability Assessment Ref. 18724ZR2let (Jeffery and Katauskas, 20 March 2008) Geotechnical Quarry Slope Stability Assessment Ref. 18724ZR2let (Jeffery and Katauskas, 19 March 2008) Email from JK Geotechnics to DADI re geotechnical advice (Bob Crotty, 4 April 2013) Eastern Creek Genesis Landfill Proposal for slope stabilisation (April 2013) Short term risks in quarry (Peter Sullivan Meynik Pty Ltd, 11 December 2008) Email from J&K to DADI re Geotechnical Advice (Paul Roberts, 6 May 2013) Report on Actions Relating to the Genesis Landfill Rock Slip (April 2013) Slope (landslip) remediation reports, invoices from contractors performing such work 6 monthly inspection reports undertaken by Ronan Dunlea between Oct 2013 and May 2015	C	6 monthly inspection reports of the pit stability were sighted by the Auditor.	C	
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
307	5.10.1	Inventory of emissions will be prepared and maintained to monitor greenhouse gas throughout the life of the Project.	Document Review	-	TBC	It is not clear whether an inventory of emissions has been developed.	NC	Develop an inventory of emissions to monitor greenhouse gas emissions of the project.
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
308	5.10.3	Energy efficiency to be a priority for all new mobile and fixed equipment during procurement for both diesel and electric powered equipment.	Document Review	GENESIS Electricity usage analysis for the period of February 2014 - December 2016 EHS Purchase Instruction - Purchase and Acquisition of Machinery and Electrical Equipment	C	The EHS Purchase Instruction includes the requirement to consider energy consumption of the equipment.	C	
309	5.10.4	All greenhouse gas producing equipment will be maintained to retain high levels of energy efficiency.	Document Review	Plant Inspection and Daily Report dated 10 February 2015, 21 October 2014 and 12 May 2014 Repairs Jobcard 2 dated 12 May 2014	C	Plant maintenance and training records were sighted by the Auditor.	C	
310	5.11.1	LHBC will implement health, safety and risk management plans for the Project.	Document Review	DADI Workplace Health and Safety Booklet, March 2015	C	The Auditor sighted the DADI Workplace Health and Safety Booklet.	C	
311	5.12.1	Where possible LHBC will locally source staff.	Document Review	Recruitment and Selection Policy	C	The DADI recruitment and selection policy was sighted and referred to sourcing of staff locally.	C	
312	5.12.2	Preparation of Local Communication Strategy for the dissemination of information regarding the Project to the local community.	Document Review	Community Information Sheet for The Eastern Creek Recycling Facility, May 2010 CEMP/OEMP, June 2015	C	The CEMP/OEMP was reviewed and includes strategy measures for local community engagement	C	

GENESIS FACILITY INDEPENDENT ENVIRONMENTAL AUDIT



*C = Compliant NC = Non-Compliant N/A = Not Applicable

ENVIRONMENTAL MANAGEMENT PLANS

Item	Section	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
AIR QUALITY, ODOUR AND GREENHOUSE GAS MANAGEMENT PLAN								
	2.2	An anemometer shall be maintained on the site at all times and shall be installed and operated in accordance with its manufacturers 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				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
313	2.2	Automated mist sprays are operational and connected to anemometer	Visual inspection Document review	Davcol receipt for rainbirds and anemometer maintenance, 31/5/2015	C	Automated mist sprays were sighted during the inspection. Copies of receipts for maintenance of both sprays and anemometer were sighted.	C	
314	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	N/A	C	Misting equipment was observed in operation inside the MPC facility during the site visit.	C	
315	2.2	Water cart must always be available on the site for the purpose of dust suppression	Visual inspection	N/A	C	The water cart was observed filling up from the filling station and wetting down road ways during the site inspection.	C	
316	2.2	All trucks leaving the site should be required to pass through a truck wheel wash before returning to sealed roads within the facility	Visual inspection	N/A	C	The auditor observed vehicles using the wheel wash prior to exiting the facility during the site visit.	C	
	2.2	Water sprays or a suitable alternative dust control measure will operate on any above ground uncovered or unsheltered stockpiles to reduce wind erosion				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
317	2.2	Sealed or gravel road must be constructed and maintained from the public roadway to the gatehouse (weighbridge) reception area of the landfill	Visual inspection	N/A	C	Sealed bitumen was observed along the roadway leading up to the weighbridge.	C	
318	2.4	Routine dust monitoring will continue on a monthly basis (4 locations)	Document review.	Dust monitoring records July 2012 to October 2015	C	Monthly dust monitoring records were sighted by the Auditor	C	
	3	In accordance with the benchmark requirements, annual gas monitoring survey of the landfilled sites will be conducted for LFG emissions				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
319	5	Odour management practices are operational including: Daily cover of the active tipping face immediate burial of odorous or offensive wastes; Dust suppression; Intermediate covering with 300mm of VENM; banning of waste burning; covered waste loads on vehicles entering site; Inspection of waste loads; Response to complaints from public regarding odour.	Document review. Visual inspection.	Genesis Landfill - Daily Procedures, June 2015 Complaints log (undated) Rejected loads register (undated)	C	A review of odour management practices in the Daily Procedures document found inclusion of the required measures and the waste refusal records indicate that inspection of waste loads has been undertaken. A review of the complaints log indicates that odour complaints were followed up and actioned.	C	
AMENITY BERMS MANAGEMENT PLAN								
320		Replace failed plants.	Visual inspection	N/A	C	Newly replaced trees were observed by the Auditor adjacent to the northern access road.	C	
		Where necessary to prevent soil erosion or soil movement, stabilise embankments. As a minimum this should be on slopes > 1 in 3. Stabilise embankments using a proprietary geotextile fabric suitable and fit for the purpose of embankment stabilisation. Plant after matting is installed.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
ASBESTOS HANDLING PROCEDURE EASTERN CREEK								
321		During operation of the Project all staff will be trained in accordance with the Industry Asbestos Awareness Course and will receive regular retraining (at least once per year).	Document review.	Spotters training register Individual training certificates	C	Asbestos Awareness Training for an employee and induction register for all employees including induction to the Asbestos Protocol Training Manual was sighted by the Auditor .	C	Records for annual retraining of staff should be kept.

ENVIRONMENTAL MANAGEMENT PLANS								
Item	Section	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
322		Asbestos waste sent to landfill will be placed to a depth of at least 0.5 m from the landfilled surface on the same day it is received. Loads which have some loose fibres or are friable will require separate burial and accordingly will be placed in pre-prepared trenches and immediately covered. They will be unloaded in such a manner as to avoid creation of dust. All asbestos waste processed at the site will be in accordance with the DECC asbestos waste requirements for a general solid waste (non putrescible) licensed landfill.	Document review.	Genesis Landfill - Daily Procedures, June 2015	C	The Landfill daily procedures document was reviewed and was found to include measures required for asbestos handling.	C	
		Checking and inspection of incoming materials prior to stockpiling or processing to minimise the risk of asbestos wastes as follows: a. First inspection will be conducted when the load arrives at the facility; and b. The second inspection will take place during or after the load is tipped on the ground prior to sorting				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
323		Asbestos waste will be stored in a secure area so as to prevent entry by unauthorised persons and to prevent the risk of environmental harm and where possible will be stored separately from other types of waste.	Document review.	Genesis Landfill - Daily Procedures, June 2015	C	No asbestos storage was observed on site. The Auditor was advised that all asbestos is sent directly to landfill, avoiding the need for storage.	C	
		Any asbestos accepted via bin waste is to be tipped into the bin allocated for this purpose. The bin is to be lined in plastic. This lining is to overlap the sides of the bin so that it can be pulled over the top of the bin and secured by adhesive tape.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
EMERGENCY FIRE AND RESPONSE PLAN (EMERGENCY EVACUATION MANAGEMENT PLAN)								
324	2	Fire extinguishers are installed in accordance with AS 2444 to provide occupants with equipment to attack a fire in its initial stages. Fire Hose Reels are installed to allow occupants to undertake fire extinguishment in the initial stages of the fire. The fire hose reel system must have fire hose reels provided so that the nozzle end of a fully extended fire hose fitted to the reel and laid to avoid any partitions or other physical barriers will reach every part of the floor of the storey and internally within 4 m of an exit. They are not to be used on fires with an associated electrical hazard.	Visual inspection	Fire Safety Certificate, 22 May 2012	C	A copy of a signed Fire Safety Certificate including AS 2444 was sighted.	C	
325	3	The site management 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. Visual inspection.	Weekly roster for the Eastern Creek litter pick up (undated)	C	The Auditor observed minimal litter on the site during the inspection of 12 February 2016. The Auditor sighted a document titled "Weekly roster for the Eastern Creek litter pick up".	C	
	3	Wood waste may be received at the site and may be stockpiled at the green waste/wood waste area which is concreted and surrounded by concrete walls. No wood waste is stockpiled for more than 12 months.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
326	4	The facility management must ensure that all employees are advised of the procedures to be followed in the event of an emergency within the site.	Document review	Emergency Evacuation Response Plan, First Five Minutes Pty Ltd, 11 February 2011 Site Induction Manual, Rev 2.1, 2015 Signed Employee and Contractor Site Induction Manuals (x4 Samples)	C	A review of the site induction manual found that it included measures to be taken by staff in an emergency. A sample of signed copies of the induction manual was sighted for both employees and contractors.	C	
FENCING AND SECURITY MANAGEMENT PLAN								
	1	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
327	1	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.	Visual inspection	Letters re written approval for signage (dated 9 April 2013, 26 March 2013 and 14 August 2013)	C	Copies of letters with approval of signage at the facility were sighted during the audit.	C	

ENVIRONMENTAL MANAGEMENT PLANS								
Item	Section	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
328	1	As per the Schedule 3 clause 55 parts a) b) and d), LHBC are required to construct and maintain amenity berms to a height of no less than 10 metres in locations as set out in appendix 1 (Site plan A 101/E) of the Development Consent. Gaps between the berms will be bridged by fences and gates which will be kept locked at all times when the facility is not operating (refer following drawings).	Visual inspection	N/A	C	The Auditor inspected a number of the amenity berms confirming that they are present and are at the correct height.	C	
329	1	LHBC will construct a 1.8m high chainmesh fence along the exposed perimeter of the quarry void, tying into the existing locked gates located at the steep sections of the existing North Eastern bund wall.	Visual inspection Document review	LHBC EMS Fencing and Security Plan (June 2011) Fencing Construction Plan (ThaQuarry Pty Ltd, 2010)	C	Fencing on site was observed to be in accordance with the approved Fencing and Security Plan	C	
GREEN WASTE MANAGEMENT PLAN								
		Incoming materials will be supervised at time of tipping to facilitate removal of contaminating or non biodegradable materials and also materials which bio-degrade at a slower pace and may thereby inhibit the overall process. Engineered wood products (e.g. MDF) and preservative-treated and coated wood residues (e.g. Copper Chrome Arsenate treated timbers), each as defined in the Raw Mulch Exemption 2008, will also be removed at this stage.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
330		Up to 20,000t of green waste may be stockpiled on site at any one time.	Visual inspection	N/A	C	Garden waste was not observed on the site. The auditee advised that garden waste for composting is not currently accepted by the project.	C	
331		Stockpiles of timber or unprocessed green waste will not be constructed more than 2.5 metres in height above the height of the protective surrounding walls.	Visual inspection.	N/A	C	Observations of the timber yard on the 12 Feb 16 showed processed and unprocessed timber stockpiles were below the stipulated maximum height.	C	
332		The operator will take steps to reduce odour by ensuring that offensive and odorous wastes are not accepted at the MPC, or if accepted are disposed and covered as quickly as possible.	Document review.	Rejected loads register (undated) Genesis Landfill - daily procedures, June 2015 Spotters training manual (undated)	C	Review of the spotters manual and daily procedures indicate that measures are in place to prevent the acceptance of odorous waste. A copy of the rejected loads register was also sighted.	C	
333		Odour monitoring will be undertaken on a daily basis by the Site Manager and the designated Site Environmental Officer.	Document review.	Field Ambient Odour Assessment and Review Study, The Odour Unit, August 2015 Excessive Odour Monitoring register	C	The auditor was advised that the Site Manager undertakes daily monitoring of odour and maintains a staff register for excessive odour reporting.	C	
334		Wastes will be covered with 150 mm of daily cover, alternative daily cover (including sealed container bases) at the end of each daily shift or in the case of odorous or offensive wastes immediately following disposal at the tipping face.	Document review.	Genesis Landfill - daily procedures, June 2015	C	Review of the daily procedure indicates these measures have been incorporated.	C	
335		Wastes will be continuously compacted throughout the days tipping operations to prevent odour or access by vermin.	Document review.	Genesis Landfill - daily procedures, June 2015	C	Review of the daily procedure indicates these measures have been incorporated.	C	
		Leachate collection sumps will collect run off leachate and re-circulate it for re-use to aid the biodegradation and dust control (in respect of processed woodchip and green waste).				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
GROUNDWATER MONITORING PLAN								
336	8	Quarterly groundwater quality sampling of the 14 active bores for a limited suite of indicator analytes (pH, EC, major anions and cations, ammonia, nitrate).	Document review.	Groundwater monitoring records	C	The Auditor sighted quarterly groundwater monitoring records dating from 2012 to 2016.	C	
337	8	Annual groundwater quality sampling of active bores for a comprehensive suite of analytes including the quarterly suite plus nutrients, dissolved metals and organic compounds.	Document review.	Groundwater monitoring records	C	The Auditor sighted quarterly groundwater monitoring records dating from 2012 to 2016 including a broad range of analytes.	C	
	8	Quarterly groundwater level monitoring in all 14 active bores.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
338	8	Continuous water level monitoring using dedicated pressure transducers and dataloggers in up to six bores to allow assessment of short-term groundwater level responses to rainfall, leachate pumping etc. in shallow, intermediate and deep aquifers. Dataloggers should be downloaded quarterly.	Document review.	Groundwater level monitoring records (sample)	C	The Auditor sighted a sample of quarterly groundwater level records at 15 minute intervals.	C	

ENVIRONMENTAL MANAGEMENT PLANS								
Item	Section	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
	8	Groundwater level and groundwater quality data will be added to the databases after each quarterly monitoring event. The data will be reviewed briefly and an exception report provided identifying any unusual results. Re-analysis or re-sampling will be considered for any such results. Groundwater levels should be compared to the hydraulic level in the leachate drainage system and any changes in the inward hydraulic gradient noted.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
339	8	A detailed review of the results of the groundwater monitoring program will be provided annually. This will include collation of all results and presentation as tables and graphs to assist interpretation. Hydrochemical assessment will be included using Piper plots or similar. Results will be compared to baseline data and to the results of monitoring of the leachate management system and any unusual results clearly identified and appropriate responses recommended, particularly where such results may have been caused by site operations. Use of statistical procedures for assessment of the results of groundwater quality monitoring should be considered once sufficient data are available. Results of groundwater level monitoring will be assessed and interpreted. Any trends in groundwater levels will be identified and potential causes considered. This will be undertaken for both short-term and long-term changes and will focus on maintenance of the inward hydraulic gradient.	Document review.	Groundwater Monitoring Plan, Genesis Facility, Eastern Creek Stage 1 Groundwater Monitoring Network, February 2013	TBC	It is not clear if a groundwater monitoring report has been prepared since the monitoring program was initiated.	NC	Prepare a groundwater monitoring report for submission to the EPA
LANDSCAPE AND VEGETATION MANAGEMENT PLAN								
340	1.3	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.	Visual inspection	N/A	C	Landscaping was observed on the amenity berms surrounding the site and along the entry driveway to the site using native species.	C	
	1.3	All visual bunds or vegetation screens will utilise native species and weed control will be undertaken as necessary, in accordance with Abel.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
341	1.4	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.	Visual inspection.	N/A	C	Buffer zones exceeding the required distances were observed from both creek tributaries	C	
	1.5	Weed Control and Vegetation Management will be carried out in accordance with the Schedule of Works in the Vegetation Management Plan (VMP).				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
342	1.5	Locked gates are to be installed at the perimeter of the Conservation Area to prevent public access.	Visual inspection	N/A	C	Locked gates were observed at the perimeter of the Conservation Area.	C	
343	1.5	Controlled access to be provided to the Conservation Area	Visual inspection	N/A	C	As above	C	
344	1.6	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	Vegetation Management Plan, October 2009	TBC	It is not clear if weed monitoring and reporting has been undertaken	NC	Suggest formalise monitoring done during regular weeding schedule
345	1.6	Monitoring shall take place at the places shown by the arrow markings on the Figures 13 and 14 above and within the VMP. <Note requirement for 10 photo points>	Document review.	Vegetation Management Plan, October 2009	TBC	As above	NC	As above
LEACHATE COLLECTION, CONVEYANCE AND MANAGEMENT SYSTEM								
346		All water in the green waste area will flow towards a sump, in which will be positioned an electronically operated submersible pump, operated automatically by float switch.	Visual inspection.	N/A	C	The sump was observed in the corner of the green waste area during the site inspection.	C	
347		In the event that Sydney Water Corporation Trade Waste requirements (pending) require the concentration of ammonia in leachate discharged to sewer to be 50mg/L, then leachate will undergo pre-treatment to reduce ammonia concentrations prior to discharge. <Leachate water quality complies with the Trade Waste Agreement limits>	Document review. Visual inspection.	Trade waste water quality monitoring records	C	The auditor sighted monitoring records for the leachate ammonia levels from the leachate treatment tanks.	C	

ENVIRONMENTAL MANAGEMENT PLANS								
Item	Section	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
		Leachate pumps are installed at the base of risers and operational. Leachate is pumped into suitable leachate storage tanks.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
348		A minimum of 5 110kL sequential batch reactors are to be placed at the site	Visual inspection.	N/A	C	Four tanks were observed on the site and the auditor was advised that a nearby leachate contingency dam acts as the 5th tank.	C	
		The use of clay and or crushed shale bunding and inclusion of a leachate trench to separate leachate from stormwater from capped areas within the landfill shall be constructed to minimise surface water flows into active landfill areas.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
349		Leachate treatment tanks located at the eastern lip of the quarry: Ensure they are waterproof. Test and certify each tank for water holding. Procure and install telemetry controlled multivalve to ensure sequential filling of tanks. Plumb pipes in parallel. Each tank to be fitted with four Stormix aeration pumps and float valves. Discharge pump discharging at approx 7 L/sec to be installed. Poly line to sewer with approved flow meter.	Document review. Visual inspection.	Trade Waste Agreement, Sydney Water, 1 April 2014 Trade waste services sheet, I/treat (3x sample)	C	Samples of trade waste services sheet sighted with no maintenance issues identified.	C	
NOISE MONITORING PROGRAM								
350	1.2	Noise levels should not exceed 36 Day LAeq (15min) dB(A)	Document review.	Series of Genesis Eastern Creek Compliance Noise Assessments ranging from 2010 – 2015 (Pacific Environment and PAE Holmes)	C	The noise monitoring reports sighted concluded that no exceedances of the limits has occurred.	C	
351	1.2	Hours of Operation to be adhered to: Mon-Fri: 0700-1800 Sat: 0800-1600 No construction on Sunday/Public Holidays	Document review.	Weighbridge receipts (sample for one week).	C	A sample of weighbridge receipts indicates that waste loads were only received between the designated hours of operation.	C	
	1.2	Monitoring will take place when the site is fully operational During the first 12 months of operation, data will be collected quarterly. If no exceedances, then it shall be six monthly. Results from the first 12 months will be collated and supplied to DoP within 3 months of the completion of monitoring				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
352	1.2	A complaints handling procedure will ensure that any complaints regarding noise are logged and appropriately recorded	Document review.	Genesis Facility Complaints Register 2010 to 2015	C	The auditor sighted the complaints register with all recorded complaints updated monthly.	C	
353	1.2	Establish and maintaining contact and liaison with a Resident Committee comprising a minimum of 3 householders	Document review.	Community Information Sheet for The Eastern Creek Recycling Facility, May 2010 CEMP/OEMP, June 2015	C	The CEMP/OEMP was reviewed and appears to include strategy measures for local community engagement	C	
354	1.2	A six monthly review of work procedures and/or noise control procedures shall be undertaken in response to complaints or to issues raised by the Residents committee	Document review.	Genesis Facility Complaints Register 2010 to 2015	C	A noise complaint in the complaints register was investigated but concluded to be unlikely to be from the facility as it occurred after operating hours.	C	
355	1.2	Non-compliance with noise goals will be reported promptly and corrective action taken.	Document review.	Noise monitoring records / reports for 2012 to 2015	C	Review of the monitoring reports indicates that no exceedances have occurred.	C	
356	1.2	On-site, fixed and mobile diesel powered plant equipment are to be correctly fitted and maintained, especially in regard to exhausts and mufflers	Document review.	Plant and equipment daily inspection records (sample)	C	Daily inspection records were sighted.	C	
	1.2	If fixed machinery is identified as being a source that exceeds noise trigger values the use of the machinery will cease until noise attenuation measures are implemented. If the noise source is a point source such as an engine or motor then the engine or motor will be housed in a suitably noise insulated cowling hood or structure.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
OIL SPILL CLEAN UP PROCEDURE								
		Are staff aware of, and conversant with the procedure.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
PESTS, VERMIN AND WEEDS MANAGEMENT PLAN (Also refer to VMP)								

ENVIRONMENTAL MANAGEMENT PLANS								
Item	Section	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
	1.5	The Proponent will ensure that vermin, birds and insects are controlled through maintaining the Landfill in a generally clean and tidy manner, including applying appropriate cover. 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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
357	1.5	Areas of standing water without an operating function must be eliminated	Visual inspection	N/A	C	No standing water was observed during the site inspection.	C	
POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN								
358		Incident response procedures are understood and in place as per their corresponding management plans	Document review.	Incident Report Register (sample) Signed Employee and Contractor Site Induction Manuals (4 x samples)	C	The incident reporting register was sighted by the auditor. Requirements for incident reporting were also a component of the induction training manual sighted during the audit.	C	
	10	The effectiveness of training modules and sessions shall be periodically (at least annually) reviewed and the modules updated				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
359	10	The Genesis Facility will be required to provide details of the training records of all employees and contractors and 'log books' of all training courses and in-house training meetings held during the operation of the site	Document review.	Signed Employee and Contractor Site Induction Manuals (4 x samples) Spotters training register	C	Samples of the signed induction manuals and the spotters training register were sighted.	C	
360	11	The entire Pollution Incident Response Management Plan is reviewed every twelve months through management reviews to ensure continuing suitability and effectiveness. The data and results of the reviews are recorded and maintained.	Document review.	The Pollution Incident Response Management Plan, March 2015.	C	The revision history of the PIRMP indicates that annual reviews have occurred between 2012 and 2015. The reason for change to the plan is also listed in the revision history.	C	Suggest including more detail of the changes made in the plan.
361	12	The Pollution Incident Response Management Plan shall be kept in written form at the EPL premises and shall be made available to all personnel responsible for implementing the plan, and to an authorised officer (as defined in the POEO Act) upon request.	Document review.	The Pollution Incident Response Management Plan, March 2015.	C	A hardcopy of the PIRMP was sighted during the site inspection.	C	
SITE SURFACE WATER MANAGEMENT PLAN								
	5.5	Each building should have its own rainwater tank (min 10kL) for reuse on site				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
362	3.2.1	Runoff from the Materials Processing Centre (MPC) and green waste area are to be diverted to sewer	Visual inspection. Document review.	Site Surface Water Management Plan, Appendix A - Surface Water Management Plan, November 2008.	C	The sump was observed in the green waste area during the site inspection which collects water for discharge to sewer. A copy of the surface water management plan also shows that the green waste area is contained in a separate catchment area.	C	
363		Stormwater runoff from the other operational areas of the site will be treated through a gross pollutant trap prior to discharge to a combined on-site detention (OSD) basin	Visual inspection.	Site Surface Water Management Plan, Appendix A - Surface Water Management Plan, November 2008.	C	Gross Pollutant Traps were observed during the site inspection and are marked on the Surface Water MP	C	
		Stormwater runoff control within the quarry pit is to be used to assist in reducing leachate volumes				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
364	3.4	At the base of the haul road, a temporary settlement sump is to be installed to slow down flows and to allow sediment to drop out prior to diversion to a clean area for pumping out or diversion to the in-pit basin	Visual inspection.	N/A	C	Haul road drainage was observed to divert to the in-pit basin.	C	
365	7.1	To ensure water quality is suitable for equipment used in irrigation or stockpile spraying/management, monitoring of water quality may take place by sampling from the site OSD basin, and if necessary from the proposed in-pit basin	Document review.	Surface water quality monitoring records	C	Surface water monitoring results for the OSD basins were sighted.	C	
SOIL, WATER AND LEACHATE MANAGEMENT PLAN								
366		Is the management plan effective, relevant and up to date	Document review.	Letter from Environ Consulting Services, 25 February 2016	C	A letter from a consultant was sighted regarding a review which concluded that the plan is suitable for the current site.	C	As suggested in the letter the plan should be updated when the revised Trade Waste agreement is received and include updated landfill data.

ENVIRONMENTAL MANAGEMENT PLANS								
Item	Section	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
367	4.1	A detailed site inspection will be conducted after a significant rain event to confirm that erosion control safeguards are working effectively	Document review.	EHS System Procedure - Stormwater drainage maintenance, February 2016	C	The stormwater procedure for the site was sighted and included a detailed inspection process.	C	
	4.1	Regular inspections of silt fences, water management safeguards and complete checklist				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
	5.3	It will be necessary to monitor storm events to determine the overall pollutant load reductions. A monitoring and testing program will be implemented to the satisfaction of OEH that tests a certain agreed number of storms at the inlet to the treatment train and at the discharge point.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
368	5.9	Monitoring of stormwater quality at OSD1 and OSD2 is recommended during rainfall events.	Document review.	Surface water monitoring results	C	Water quality monitoring results for the two OSD basins were sighted during the audit	C	
369	5.9	Inactive capped areas and active tipping areas in sector B are to be separated by compacted earth banks	Visual inspection.	N/A	C	Earth banks were observed around the active tipping area in Sector B.	C	
	5.9	Leachate is suitably separated from stormwater from capped areas within the landfill				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
370		Surface water, groundwater and leachate response plan is available and procedures understood	Document review.	The Pollution Incident Response Management Plan, March 2015. EHS induction skills assessment and training, March 2015	C	A hardcopy of the PIRMP was reviewed and included training requirements for staff. The EHS induction skills assessment procedure includes environmental components.	C	
371	8	The data gathered from the monitoring programme associated with implementation of this report should be reviewed on a regular basis. Changes to the overall system including monitoring requirements / frequency would be recommended based on the data reviews.	Document review.	Groundwater Quality Monitoring Records EPL 20121 and 13426	TBC	It is not clear if a groundwater monitoring review has been initiated.	NC	Review groundwater monitoring data and determine monitoring program improvements to include in the groundwater monitoring report (see item 339).
TRAFFIC AND TRANSPORT CODE OF CONDUCT								
372		A Traffic Management Plan is designed and implemented and haulage roads are maintained to an agreed satisfactory standard	Document review. Visual inspection	Dial A Dump Industries EMS Traffic and Transport Code of Conduct (June 2011)	C	The code of conduct was sighted and roads were observed in a good state of repair during the audit.	C	
		Signage of speed restrictions and directional signage are maintained and clearly visible				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
373		Drug and alcohol policy is enforced	Document review.	DADI Alcohol and Other Drugs Policy and Procedures Signed Employee and Contractor Site Induction Manuals (x4 Samples)	C	The policy was sighted and the employee induction manual appears to outline measures for enforcement of the policy.	C	

ENVIRONMENTAL MANAGEMENT PLANS								
Item	Section	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
374		Load cover requirements are enforced and appropriate facilities are provided	Visual inspection		C	Loads were observed entering the facility covered. A stand for drivers to remove covers prior to load inspection was also observed in use.	C	
		Overloading for any haulage combination does not occur				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
375		No access to or from the facility from Archbold Rd	Visual inspection	N/A	C	No access road to/from Archbold road was observed by the Auditor during the inspection.	C	
376		Vehicles associated with the facility do not park or queue on the public road network at any time	Visual inspection Document review	Dial A Dump Industries EMS Traffic and Transport Code of Conduct (June 2011)	C	The Auditor did not observe any traffic queuing on the public roads during the site inspection. The parking spaces on site were also observed during the audit.	C	
CONVEYOR AND CHUTE SYSTEM MAINTENANCE AND MANAGEMENT PLAN / DETAILED DESIGN PLANS								
		The MP implies the system will include a waste drop height of no more than 3 metres between the end of the sock and the base of the quarry.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
377		Fine Mist sprays will be installed at or near the end of the chute and in the immediate "drop area" as soon as basal liner works have been completed and certified by the EPA as approved. These will be operational prior to commencement of use of the chute and will be supplied with water from the clean water detention basin (s) which have just been constructed as part of the liner works.	Document review	Design Plans - Chute Pipe General Arrangement incorporating fine mist sprays at discharge end of the chute to minimise dust, 23 March 2011	C	The auditor observed design plans for the chute with incorporated water lines.	C	
378		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: a. First inspection will be conducted when the load arrives at the facility, b. Second inspection at the checkpoint for traffic management and further load inspection, and c. Third inspection when materials are unloaded. 3. Independent auditing of this system which minimises the risk of the presence of asbestos and other contaminants; 4. Recording of non-complying generators illegally disposing of asbestos wastes; and 5. 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 register Individual training certificates Spotters training manual 2015	C	1. Asbestos Awareness Training for an employee and induction register for all employees including induction to the Asbestos Protocol Training Manual was sighted by the Auditor. 2. Review of the Spotters Training Manual found it includes the listed requirements.	C	
379		Asbestos waste will not be shredded and will not be handled in any way within the MPC except under the most stringent conditions applicable to bagged waste.	Visual inspection Document review	Spotters Training Manual 2015	C	Review of the spotters manual indicates systems are in place to identify and reject asbestos from the recycling facility.	C	
380		Wastes that contain asbestos will not be mixed with other wastes.	Document review	Asbestos Management Plan, February 2014 EHS Work Instruction - Asbestos Handling Procedure, March 2015	C	Review of the plan and procedure reveals measures are in place to prevent the mixing of asbestos with other waste types.	C	
381		All asbestos will be carefully unloaded under supervision by the operator.	Document review	EHS Work Instruction - Asbestos Handling Procedure, March 2015	C	Review of the procedure states that all asbestos loads must be supervised by the operator.	C	
382		Unbagged, uncovered or unsecured asbestos fibre and dust waste will be directed back to the quarantine and gatehouse area for redirection and the DECCW will be informed and an incident report completed.	Document review.	EHS Work Instruction - Asbestos Handling Procedure, March 2015	C	Review of the procedure states that all unsecured asbestos loads must be sent back to the gatehouse.	C	
		In the unlikely event that Asbestos waste is detected in the chute system the Operator will immediately cease operation of the Culvert Conveyor and the Downhill Conveyor. An Inspection of the DASS shall be immediately carried out to identify and remove from the system any pieces of bonded asbestos. If the presence of Asbestos is confirmed then cleansing of conveyor belts with water shall take place in the presence and under the supervision of a qualified Asbestos Hygienist who shall document and report upon the measures undertaken.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		

GENESIS FACILITY INDEPENDENT ENVIRONMENTAL AUDIT



*C = Compliant NC = Non-Compliant N/A = Not Applicable

ASSESSMENTS AND REPORTS

Item	Comment	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
BUSHFIRE HAZARD ASSESSMENT (HOLMES FIRE AND SAFETY, 31 July 2008)								
	7 (a)	Asset Protection Zones should be implemented as specified within Section of the report				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
383	7 (b)	Asset Protection Zones are managed in accordance with the report.	Visual inspection.	Asset Protection Zone maintenance records. EHS Procedure - minimising the risk of fire	C	The auditor observed earthen embankments surrounding the facility providing fire protection and low levels of ground fuel loads.	C	
384	7 (c)	The land owner / land manager is responsible for the implementation and ongoing management of all Asset Protection Zones	Document review.	Asset Protection Zone maintenance records.	C	Noted.	C	
HERITAGE CONSERVATION STRATEGY FOR ABORIGINAL SITES IN THE LANDS OWNED BY VALAD FUNDS MANAGEMENT LTD AND SARGENTS PL., IN THE EASTERN CREEK BUSINESS PARK (STAGE 3) PRECINCT PLAN BLACKTOWN, NSW. JULY 2015.								
	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				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
LIGHT HORSE BUSINESS CENTRE NOISE IMPACT ASSESSMENT (ERM, 2008)								
	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.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
385	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 (June 2011)	C	Review of the Noise Monitoring Program found this mitigation measure has been included.	C	
TRAFFIC IMPACT ASSESSMENT, PROPOSED RESOURCE RECOVERY AND LANDFILL FACILITIES QUARRY ROAD, EASTERN CREEK (TRANSPORT AND TRAFFIC PLANNING ASSOCIATES, 2008)								
		Circulation Roadways: construct a sealed industrial standard road pavement (Council design standard)				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
386		Circulation Roadways: provide appropriate directional and regulatory signposting	Visual inspection.	N/A	C	The auditor sighted appropriate signage throughout the site during the inspection	C	
387		Circulation Roadways: Provide appropriate lighting	Visual inspection.	N/A	C	The auditor sighted appropriate road lighting throughout the site during the inspection	C	
388		Circulation Roadways: provide appropriate fencing and barriers to avoid any safety issues in relation to the quarry wall (vehicle and pedestrian)	Visual inspection.	N/A	C	The auditor sighted appropriate fencing around the quarry during the inspection	C	
389		Circulation Roadways: provide paved parking areas and linemarked parking areas	Visual inspection.	N/A	C	The auditor sighted designated paved parking for over 50 cars during the inspection	C	

GENESIS FACILITY INDEPENDENT ENVIRONMENTAL AUDIT



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CRITERIA DERIVED FROM REGULATORY CONSULTATION

Item	Comment	Audit Criteria	Audit Methodology	Documentation Reviewed	Auditee Assertion	Auditors Observations / Notes	Auditors Conclusion	Recommendations
Sydney Water								
		Green Waste Area Release Valve: A concern was raised about the location of a release valve in the green waste area, and in particular whether the location and height of the valve could compromise the integrity of the bund.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
390	1	The facility has a twelve month conditional consent to discharge leachate. Eight (8) samples of discharge should be collected during this period.	Document review.	Leachate sampling results.	C	The auditor sighted leachate sampling results for the period from 1/4/14 to 15/3/15 which included more than the required number of samples.	C	
391	2	Maximum and instantaneous leachate discharge rates must be controlled to the consented level: Evidence of appropriate controls of maximum and instantaneous discharge should be provided.	Document review.	Sydney Water Trade Waste Compliance Report, 8 July 15	C	Trade waste compliance report indicates that a flow meter has been installed and was confirmed to be operational. The report also indicates that instantaneous rates and total discharge controls have been set.	C	
392	3	Leachate tanks (bioreactors?) should not be drained completely so that biomass is discharged into the sewage system. Sydney Water is not clear what fail safes are in place to ensure biomass is not released from the bioreactors	Document review.	The Leachate Collection, Conveyance and Management System, June 2015	C	The leachate management system indicates that float valves will be used to control the filling and discharge of tanks to sewer.	C	
393	4	The water meter backflow compliance needs to be checked.	Document review.	Sydney Water Trade Waste Compliance Report, 8 July 15	C	Compliance certificate from Sydney Water was sighted during inspection	C	
EPA								
		Under the Protection of the Environment Operations (Waste) Regulation 2005, the site is required to have an operational weighbridge, video monitoring system, conduct annual volumetric surveys and provide monthly waste contribution reports to the EPA.				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		
		The site and operations should be compliant with the NSW waste regulatory framework. Do products generated at the premises meet resource recovery exemptions?				See Genesis Independent Environmental Audit, Appendix B - 21 August 2015.		