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2018 Annual Review Report for DPE
Condition C11 of SSD5300
Kembla Grange Recycling Pty Ltd

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This 2018 Annual Review report has been prepared by the following staff of Jackson Environment and Planning Pty Ltd, Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060.

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We declare that:

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

Report version	Authors	Date	Reviewer	Approved for issue	Date
Draft 1	R.Loemker, Dr M. Jackson	13/04/19	Dr M.Jackson	Dr M.Jackson	15/04/19
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1. Executive Summary

This Annual Review report has been prepared for Kembla Grange Recycling Pty Ltd, owner and operator of a construction and demolition waste recycling facility located at 50 Wyllie Rd, Kembla Grange. Under Condition C11 of development consent SSD5300 operating at the site, the proponent is required to report to the Secretary of the Department of Planning and Environment on the environmental performance of the development. An Annual Review is required by the end of March each year.

As per the requirements of Condition C11, the report provides an overview of the environmental performance of the development by describing the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year. The report includes a review of the monitoring results and complaints records of the development over the last calendar year, including a comparison of the results against the:

- Relevant statutory requirements, limits or performance measures / criteria;
- Requirements of any plan or program required under the consent;
- Monitoring results of previous years; and
- The relevant predictions in the EIS.

The Annual Review also identifies any non-compliance over the last calendar year, and describe what actions were (or are being) taken to ensure compliance; identifies trends in the monitoring data over the life of the development; identifies any discrepancies between the predicted and actual impacts of the development and analyses the potential cause of any significant discrepancies. Furthermore, under the C11 consent condition, the proponent must describe what measures have or will be implemented in the current calendar year to improve the environmental performance of the development.

To inform the Annual Review, an assessment of compliance with the planning consent and environmental management requirements as specified in the following documents has been performed:

- State Significant Development (5300) Conditions of Consent;
- State Significant Development (5300) Statement of Commitments;
- State Significant Development (5300) Mod 1 Conditions of Consent;
- Environment Protection Licence 20601;
- Department of Primary Industries Controlled Activity Approval;
- Pollution Incident Response Management Plan; and
- Operational Environmental Management Strategy as approved by Department of Planning and Environment on 26/02/18 (including sub-environmental strategies).

A compliance audit was conducted on 12 March 2019. This involved a detailed desktop assessment of all management documentation, and a site inspection across the entire facility. Generally, the audit found that the site appears to be managed well and is in a compliant state.

Data available for assessment suggested that the facility is being managed within the predictions in the Environmental Impact Statement. It is noted that no complaints were received in the past 12 months in relation to the operations at the site.

Since the previous annual review, the Stage 1 construction works were completed (December 2017) with the final Occupation Certificate issued on 23 January 2018. A varied EPA licence for the completion of the development (Stage 1) and scale up in waste tonnages up to 230,000 tonnes per annum was approved on 6 April 2018 following the approval of the Operational Environmental Management System by the Department of Planning and Environment.

A development modification is currently being considered by the Department of Planning and Environment under Section 4.55(1a) of the *Environmental Planning and Assessment Act 1979* for the following works (retrospective approval of works):

- Installation of rainwater storage tanks on the premises in a location which differs from the approved plans under SSD 5300 Mod 1;
- Installation of firewater storage tanks and a pump room on the premises; and
- An outdoor picking station and associated processing equipment (including de-stoning screen and generator) in the central processing area of the site, installed above a push wall structure built on the premises.

An observation was made during the site inspection which relates to the stormwater and leachate ponds which have been lined with a plastic liner to better protect groundwater, and the batters of the pond sides have changed and they appear marginally different from the original ponds. However, it is noted they are generally in accordance with the consent.

During the site visit, a small amount of building materials and litter was observed adjacent to the riparian area. This was cleaned up on the same day as the inspection.

The following list of minor non-compliances from the previous audit have been reviewed during the 2018 Annual Review and were found to have been completed or rectified:

- The weather station was sighted during the site audit;
- Weighbridge office was not connected to the rainwater tank and outlet to drainage system as per SSD5300 MOD 1 plans, leading to collection of water under weighbridge;
- Main warehouse was not connected to rainwater tanks as approved in SSD5300 plans;
- Batter on northern part of Site lacks vegetation and needs to be revegetated;
- Operational Environmental Management Plan has not been uploaded to the website;
- Requirement to write to Office of Water to advise on change of ownership in May 2017; and
- CCTV camera was offline during inspection.

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1. Introduction

1.1. Background

This Annual Review report has been prepared for Kembla Grange Recycling Pty Ltd, owner and operator of a construction and demolition waste recycling facility located at 50 Wyllie Rd, Kembla Grange. The site is licensed by the NSW Environment Protection Authority (EPL 20601) and has been successfully operating since 2013. It was originally owned and operated by Wollongong Recycling and Building Supplies Pty Ltd. In May 2017, Wollongong Recycling (NSW) Pty Ltd took ownership of the facility. Wollongong Recycling (NSW) Pty Ltd later changed its business name to Kembla Grange Recycling Pty Ltd. The facility was originally approved under Development Consent DA2009/1153 from Wollongong City Council.

On 7 March 2016, approval to expand the capacity of the facility was provided under State Significant Development SSD5300 by the Minister for Planning to receive up to 230,000 tonnes per annum of construction and demolition and commercial and industrial wastes. A further modification to the consent under SSD5300 Mod 1 was approved by the Minister for Planning on 8 June 2017 to relocate the second weighbridge and enable installation of a larger weighbridge office.

The facility receives building and demolition and other wastes for recycling as value added materials. Materials are delivered by a customer base which includes waste collection services, building and construction, small and medium sized businesses and trades.

The facility aims to achieve an 85% recovery rate from processing incoming materials that include concrete, asphalt, tiles, timber, masonry, clay, soils and garden organics. Mobile plant, including excavators and front-end loaders, are used to remove contaminants and separate incoming building and construction wastes for containment in storage bunkers prior to processing.

On 19 August 2016, the Secretary of the Department of Planning and Environment approved the management plans for the development under SSD5300, including approval of construction plans and the Construction Environment Management Plan. A licence variation was obtained from the EPA on 20 September 2016 to undertake construction works. The construction works for Stage 1 were completed in December 2017, with the final Occupation Certificate issued on 23 January 2018. A varied EPA licence for the completion of the development (Stage 1) and scale up in waste tonnages up to 230,000 tonnes per annum was approved on 6 April 2018.

Under Condition C11 of development consent SSD5300, by the end of March each year, Kembla Grange Recycling Pty Ltd is required to report to the Secretary of the Department of Planning and Environment on the environmental performance of the development. This Annual Review provides an overview of the environmental performance of the development, including an assessment of compliance with all consents, licenses and approvals. The review also provides a summary of proposed activities for the next 12 months and makes recommendations to improve the environmental performance of the development.

1.2. Annual Review requirements

Under Condition C11 of development consent SSD5300 operating on the site, an Annual Review is required by the end of March to assess the environmental performance of the development. The review must:

- **Condition C11(a):** Describe the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;
- **Condition C11(b):** Include a comprehensive review of the monitoring results and complaints records of the development over the last calendar year which includes a comparison of the results against the:
 - i. The relevant statutory requirements, limits or performance measures / criteria;
 - ii. Requirements of any plan or program required under the consent;
 - iii. The monitoring results of previous years; and
 - iv. The relevant predictions in the EIS.
- **Condition C11(c):** Identify any non-compliance over the last calendar year, and describe what actions were (or are being) taken to ensure compliance;
- **Condition C11(d):** Identify any trends in the monitoring data over the life of the development;
- **Condition C11(e):** Identify and discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and
- **Condition C11(f):** Describe what measures have or will be implemented in the current calendar year to improve the environmental performance of the development.

1.3. Overview of the approved State Significant Development

On 7 March 2016, State Significant Development SSD5300 was approved by the Minister of Planning to enable an expansion to the Kembla Grange Resource Recovery Facility. The site currently supplies important recycling services for householders, builders and developers in the Wollongong Region, and is making an important contribution to helping the NSW Government meet its recycling target of 80% for construction and demolition waste by 2021¹. Due to increasing demand for recycling services for building waste and commercial and industrial waste from businesses, an expansion to the existing Resource Recovery Facility has been approved.

The SSD5300 consent (and SSD5300 Mod 1) is being implemented in two stages. Construction and operation of Stage 1 of the development has been completed and Stage 2 is yet to commence. Separate approvals under Condition A10 of development consent SSD5300 is required from the Department of Planning and Environment prior to commencement of construction of this stage of the development.

Stage 2 of the approved development involves developing the eastern part of the facility including the following. This stage is yet to commence:

- Construction of a workshop facility;
- Construction of truck parking areas;
- Construction of retaining wall;
- Installation of water tank;
- Construction of a minor surface water sediment retention dam with hydrocarbon capture; and
- Construction of a new site building and site office/staff OH&S training building.

¹ NSW EPA (2014). NSW Waste Avoidance and Resource Recovery Strategy: 2014 – 2021. Published by the NSW EPA. Internet publication: <http://www.epa.nsw.gov.au/wastestrategy/warr.htm>

1.4. Summary of consents, licences and approvals

To help inform the Annual Review and the compliance audit undertaken by Jackson Environment and Planning Pty Ltd, a list of consents, licences and approvals are provided in Table 1.1 below. These statutory requirements have informed the audit framework for the compliance audit and has assisted in the assessment of the environmental performance of the development from January 2018 to December 2018.

Table 1.1. Summary of consents, licences and approvals operating at 50 Wyllie Rd, Kembla Grange.

Approval type	Reference / details	Date issued	Regulatory authority
On-site Sewage System Approval to Operate	OS-2015/15 – Approval to operate an on-site sewage system	31 August 2015	Wollongong City Council
Planning consent (and Statement of Commitments)	SSD5300 development approval	16 March 2016	Minister for Planning
Controlled Activity Approval	10ERM2009/1008. Issue for carrying out works in a riparian area	24 May 2016	Department of Primary Industries
Management Plan approval (enabling construction of Stage 1 of development)	Stage 1 works including Water Management Plan, Air Quality Management Plan, Landscape Management Plan and Construction Environment Management Plan	19 August 2016	Department of Planning and Environment
Construction Certificate (Stage 1)	Construction Certificate Cert. No. 2306	8 September 2016	Illawarra Building Certifiers Pty Ltd
Environment Protection Licence	EPL20601 varied for the completion of the Stage 1 development and scale up in waste tonnages up to 230,000 tonnes per annum	20 September 2016 (varied 6 April 2018)	NSW Environment Protection Authority
Planning consent	SSD5300 Mod 1 development approval for relocating the second weighbridge and enable installation of a larger weighbridge office)	8 June 2017	Minister for Planning
Occupation Certificate	Occupation Certificate Cert. No. 2306	23 January 2018	Illawarra Building Certifiers Pty Ltd
Operational Environmental Management Strategy (including Pollution Incident Response Management Plan)	Operational Environmental Management Strategy as required under Conditions C3 and C5 of SSD5300	26 February 2018	Department of Planning and Environment

1.5. Scope of the review

The Annual Review has considered the overall performance of the development for the period of January 2018 to December 2018 (inclusive) and has involved a detailed review of compliance against all consents, approvals and licenses as given in Table 1.1.

The purpose of the review is to evaluate the environmental performance of the development, and to recommend changes to management of the development to ensure:

- The environment and human health is protected;
- The statutory obligations of the site owner and operator are met in full;
- The development and operations of the facility for the previous 12 months are captured as a record of activities undertaken to inform regulators, neighbours and the community;
- The environmental performance of the facility is in line with predictions in the EIS for the development;
- Review non-compliances for the past calendar year, and what actions were or are being undertaken to ensure compliance;
- Review and assess trends in monitoring data for the development, and to identify discrepancies; and
- Identify measure that have or will be undertaken to improve the environmental performance of the development; and
- Demonstrate compliance with Condition C11 of SSD5300.

To complement the Annual Review, we have undertaken a desktop and site-based compliance audit of the development. The on-site audit was undertaken on 12 March 2019 by Dr Mark Jackson, Director, Jackson Environment and Planning Pty Ltd, in accordance with the following consents, licenses and approvals as per Table 1.1 above.

- State Significant Development (5300) Conditions of Consent;
- State Significant Development (5300) Statement of Commitments;
- State Significant Development (5300) Mod 1 Conditions of Consent;
- Environment Protection Licence 20601;
- Department of Primary Industries Controlled Activity Approval;
- Pollution Incident Response Management Plan; and
- Operational Environmental Management Strategy as approved by the Department of Planning and Environment on 26 February 2018 (including sub-environmental strategies).

2. Annual Review findings

This section provides an overview of the main findings of the Annual review of the Kembla Grange Recycling’s Resource Recovery Facility located at 50 Wyllie Rd, Kembla Grange. The findings address all the requirements of Conditions 11(a) to 11(f) under SSD5300.

2.1. Development over the past calendar year and proposed for next calendar year (Condition C11(a))

For the 2018 calendar year, the focus of the development has been to complete the stage 1 construction works as per SSD5300 and SSD5300 Mod 1 consents. The construction works for Stage 1 were completed in December 2017, with the final Occupation Certificate issued on 23 January 2018. A varied EPA licence for the completion of the development (Stage 1) and scale up in waste tonnages up to 230,000 tonnes per annum was approved on 6 April 2018.

A development modification is currently being considered by the Department of Planning and Environment under Section 4.55(1a) of the *Environmental Planning and Assessment Act 1979* for the following works (retrospective approval of works):

- Installation of rainwater storage tanks on the premises in a location which differs from the approved plans under SSD 5300 Mod 1;
- Installation of firewater storage tanks and a pump room on the premises; and
- An outdoor picking station and associated processing equipment (including de-stoning screen and generator) in the central processing area of the site, installed above a push wall structure built on the premises.

2.2. Review of monitoring results, complaints and predictions in EIS (Condition C11(b))

During 2018, operations were conducted in accordance with approved plans and conditions of consent.

A summary of key statutory requirements, limits or performance measures / criteria and requirements of any plan or program required under the consent is shown in Table 2.1. Monitoring performed is also documented.

Table 2.1. Summary of key statutory requirements, limits or performance measures / criteria and requirements of any plan or program required under the consent.

Requirement or limit under consent	Description	Monitoring performed
Waste receipt (during 2018) under Condition A6 following scale up under Condition A7 of SSD5300	Limit of 230,000 tonnes per year of waste received at the site	Daily Site Supervisor checks and Monthly Waste and Resource Reporting Portal data submitted to NSW EPA
Authorised amount under NSW EPA Licence 20601	Limit of 45,000 tonnes of waste stored on site at any one point in time;	Daily Site Supervisor checks and Monthly Waste and Resource Reporting Portal data submitted to NSW EPA

Requirement or limit under consent	Description	Monitoring performed																						
	including not more than 2,500 m ³ of garden waste and wood waste																							
Operating hours	<p>Operations (delivery and operation of machinery): 7am to 6pm Mon to Fri; 8am to 4pm Sat; Nil Sun & Public Hols</p> <p>Operations (all other operational activities): 6am to 6pm Mon to Fri; 8am to 4pm Sat; Nil Sun & Public Hols</p>	Daily Site Supervisor checks																						
Noise	Noise during operation of the development	Operational Environmental Management Strategy; Complaints Register																						
	<p>Table 3: Noise criteria (dB(A))</p> <table border="1"> <thead> <tr> <th rowspan="3">Location</th> <th colspan="3">Noise criteria (dB(A))</th> </tr> <tr> <th>Day</th> <th colspan="2">Morning Shoulder</th> </tr> <tr> <th>L_{Aeq} (15 minute)</th> <th>L_{Aeq} (15 minute)</th> <th>L_{Aeq} (1 minute)</th> </tr> </thead> <tbody> <tr> <td>The dwelling on Lot 11 DP 878167</td> <td>35</td> <td>35</td> <td>45</td> </tr> <tr> <td>Any dwelling in Farmborough Heights</td> <td>37</td> <td>37</td> <td>47</td> </tr> <tr> <td>Any dwelling in the vicinity of Kingston Town Drive</td> <td>41</td> <td>41</td> <td>51</td> </tr> </tbody> </table>		Location	Noise criteria (dB(A))			Day	Morning Shoulder		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (1 minute)	The dwelling on Lot 11 DP 878167	35	35	45	Any dwelling in Farmborough Heights	37	37	47	Any dwelling in the vicinity of Kingston Town Drive	41	41	51
Location	Noise criteria (dB(A))																							
	Day	Morning Shoulder																						
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The dwelling on Lot 11 DP 878167	35	35	45																					
Any dwelling in Farmborough Heights	37	37	47																					
Any dwelling in the vicinity of Kingston Town Drive	41	41	51																					
Surface water quality (discharged) and grab sampled from pond every 6 months	Quality of surface water discharged to a watercourse following treatment	<p>pH: 6.5 – 8.5</p> <p>Total suspended solids: 30 mg/L</p>																						
Groundwater quality	Quarterly reporting of groundwater from wells pre- and post-development for submission to Office of Water	6 wells established in February 2018 and monitoring of groundwater quality commenced in March 2018.																						
Odour	Occupant shall not allow any odour to leave the boundary of the development	Daily Site Supervisor checks; Operational Environmental Management Strategy; Complaints Register.																						
Dust	Occupant shall not allow any material, sediment or oil to be tracked from the development. No dust is to leave the boundary of the development	Daily Site Supervisor checks; Operational Environmental Management Strategy; Complaints Register.																						
Incidents	Reporting of incidents to NSW Environment Protection Authority and in accordance with Pollution Incident Response Management Plan	Incidents response register.																						
Complaints	Recording and response to complaints made in relation to the development	Online complaints register; Incidents response register.																						

An assessment of how the development has performed in relation to these criteria during the 2018 calendar year, including monitoring results during 2018 is given in the following sections. A comparison of these results has been made to the relevant predictions in the EIS.

2.2.1. 2018 waste receival

During 2018, waste receival and recycling operations were carried out in accordance with Condition A6 and A8 of SSD5300 and authorised amount under NSW EPA Licence 20601 which includes the following limits:

- 230,000 tonnes per year of waste received at the site;
- 45,000 tonnes of waste stored on site at any one point in time, including:
 - No more than 2,500 m³ of organic waste on the site at any one point in time;
 - No more than 500 m³ of the above limit on organic waste is to comprise compost product.

An analysis of waste received at the site for recycling by month in 2018 is given in Table 2.2, including data on the total amount of waste processed and sent off-site for recycling. Data is provided on the total amount of waste (stock) held at site at the end of the month.

The analysis suggests that the site received a total of 144,061 tonnes of waste in 2018, which is below the maximum threshold of 230,000 tonnes per annum. At all times, the total amount of stock held on site was less than the consent limit of 45,000 tonnes, and daily checks are performed to ensure that less than 2,500m³ of organic waste is held on site at any one point in time. It is noted that no composting was performed on site, and no compost was therefore held as stock on the site.

Table 2.2. Total quantity of waste received by the site in tonnes during the 2018 calendar year, and closing stock at the end of the month. Data from monthly WARRP reports submitted by the site to the NSW EPA.

Month in 2018	Opening Stock	Total waste received (tonnes)	Total amount processed and sent off-site for recycling (tonnes)	Total waste held on site at end of month (tonnes)
January	500	3,258.56	3,041.05	718
February	718	3,815.94	3,815.94	0
March	0	14,231.84	10,101.78	4,130.06
April	4,130.03	4,130.06	20,579.39	24,709.45
May	24,709.45	25,584.06	14,916.74	35,376.76
June	35,376.76	15,891.24	15,613.12	35,654.88
July	35,654.88	16,552.50	24,788.51	27,418.87
August	27,418.87	16,141.67	15,955.97	27,604.57
September	27,604.57	9,518.93	9,596.82	27,526.68
October	27,526.68	9,761.77	7,646.42	29,642.03
November	29,642.03	14,526.08	11,362.83	32,805.28
December	32,805.28	10,648.79	8,046.22	35,407.85
TOTAL	-	144,061.44	145,464.79	-

¹ Note that the amount of organic waste received on site is limited to garden waste and wood waste. The amount of organic waste held on site is included in the 'Total waste held on site at end of month' column.

2.2.2. Authorised amount under NSW EPA Licence 20601

During 2018, the site was operated to ensure that the amount of waste stored on site did not exceed the authorised amount of 45,000 tonnes (at any one point in time) as per Condition A8 of SSD5300 and Condition L3.2 of EPA Licence 20601 (refer to the final column of Table 2.2).

During the 2018 calendar year, the site complied with this requirement, with evidence provided to the EPA as part of the site's monthly waste reporting. This was cited as part of the audit. Daily checks are also performed by the Site Supervisor as part of the Daily Site Supervisor Checklist.

2.2.3. Operating hours

The Site Supervisor manages access to the facility and ensures compliance with the site's operating hours consent restrictions. A single locked main access gate ensures that staff, visitors and contractors fully complied with this requirement for the 2018 calendar year.

2.2.4. Noise

Approved noise mitigation measures for the site are documented in the Operational Environmental Management Plan as approved by the Secretary of the Department of Planning and Environment. A series of noise minimisation and mitigation measures are used to ensure that noise does not impact on nearby sensitive receptors.

During this time, no complaints were received, given the site fully implemented all noise mitigation measures.

An updated background noise assessment was conducted by GHD between 11 and 12 September to 24 September 2018 to obtain a new baseline for the SSD Mod2 application and under the EPA's *Noise Policy for Industry*. Unattended and attended noise monitoring was performed at 6 Bardess Crescent, Farmborough Heights (to the north, being the closest residential receptor) and on the site boundary (to the east, location of the Macedonian Orthodox Church). The positioning of the noise loggers was done to ensure they were secure and not subject to theft and vandalism, and considered representative of the ambient environment.

Noise monitoring done was not designed to confirm compliance with limits given in Condition B20 of the development consent. However, it is noted that the site continuously monitors noise by various methods including through a noise meter installed on the site's meteorological station, and these logs are reviewed to identify noisy plant and equipment. Additional measures are then taken to minimise the use of this equipment, and mitigation measures are taken to reduce noise emissions.

2.2.5. Surface water quality (discharged)

In the 2018 calendar year, the site did not discharge any water into the unnamed creek on the south side of the development. However, under the Environment Protection Licence for the site (Condition M2.2), surface water quality testing is required once every 6 months and during overflow events. The results of these analyses and a comparison to EPA discharge limits in EPL 20601 (as per Condition L2.4 of the EPA licence) is given in Table 2.3. Testing suggests the site complied with EPA licence requirements.

It is noted that as part of Condition M2.2 of EPL 20601, surface water quality testing is required once every 6 months and during overflow events. It is noted that a second sampling event was attempted in August 2018, though no water was available in the pond to sample at the EPA approved sampling point. This explains why Table 2.3 contains data for only one sampling event. Given that a sampling event was attempted and there was no water to sample, it is considered that the operator has complied with this licence condition.

Table 2.3. Surface water quality testing associated with water in stormwater detention pond as per Condition M2.2 of Environment Protection Licence 20601. Results are for grab samples of detained water in sediment pond only as no overflow events occurred during the year.

Pollutant	Grab sample from stormwater detention pond (date)	Result	EPA Licence limit	Compliant? (Y/N)
pH	19/02/18	7.3	6.5-8.5	Y
Total suspended solids (mg/L)	19/02/18	<5	30	Y

Soil and erosion control measures during the compliance audit on 12 March 2019 generally found that the existing measures were considered satisfactory as per the Soil and Water Management Plan approved by the Secretary of the Department of Planning and Environment.

An observation was made during the site inspection which relates to the stormwater and leachate ponds which have been lined with a plastic liner to better protect groundwater, however the batters of the pond sides have changed and they appear marginally different from the original design.

No evidence of mud or sediment tracking onto the public road was evident. Street sweepers were observed in operation, which regularly sweep the hardstand areas to keep them free of soil and sediment. Careful management of surface water and sediment will be required as the facility increases the receipt of waste, with more vehicles accessing the site daily.

2.2.6. Groundwater quality

Six (6) new groundwater wells were established in February 2018 to enable the collection of groundwater samples pre- and post-development for reporting to the Office of Water on a quarterly basis. Consulting Earth Scientists Pty Ltd completed the first monitoring round for the newly installed wells in May 2018 and the third round of quarterly environmental monitoring in November 2018.

Baseline groundwater quality data prior to the approval of SSD5300 is shown in Table 2.4. Results from a groundwater well upstream of the development was chosen to best represent pre-development groundwater conditions. This sample was taken on 9th July 2013 by Benviron Group. Baseline data is compared to groundwater data sampled post-development in May, August and November 2018. For this analysis, groundwater data reported for Groundwater well 5 is given, as this well is upstream of the development. Groundwater data for well 2 is also shown, representing groundwater downstream of the development.

In 2018, data suggests that groundwater quality was very similar between wells upstream and downstream of the development. This suggests that the development had no influence on groundwater quality, indicating that the design and management of the pavement and water management systems on site is adequately protecting groundwater.

Furthermore, groundwater quality upstream of the development in 2018 was similar to that sampled in 2013, except for slightly higher concentrations of soluble salts, such as sodium and calcium (in 2018). These soluble salts are an indicator of groundwater hardness, and can be influenced by rainfall and groundwater flows through the landscape.

Continued groundwater monitoring in 2019 will help to validate the ongoing effectiveness of the pavement and water management systems on the site.

Table 2.4. Groundwater quality testing results for 2018. Results have been compared to baselines groundwater monitoring undertaken in the EIS for the development.

Monitoring Date	Concentration range for analytes detected in groundwater in 2018											
	pH	Electrical Conductivity (µS/cm)	Arsenic (µg/L)	Chromium (µg/L)	Copper (µg/L)	Nickel (µg/L)	Zinc (µg/L)	Lead (µg/L)	Nitrate (mg/L)	Sodium (mg/L)	Calcium (mg/L)	TRH (C ₁₀ -C ₃₆) (µg/L)
Concentration of analytes reported in the EIS groundwater investigation conducted by Benviron Group (report dated 20/06/14) – Baseline groundwater analysis for GW 1 (upstream of development)	Not reported	Not reported	<1	<1	<4	<1	<5	<1	0.69	20	8.8	<100
5 May 2018 – GW5 - Upstream	5.74	1353	<1	<1	1	8	20	<1	0.086	230	60	<100
5 May 2018 – GW2 - Downstream	6.10	1009	1	<1	1	4	14	<1	0.006	99	59	<100
17 August 2018 – GW 5 Upstream	6.16	750	<1	<1	4	14	21	<1	0.05	130	29	<100
17 August 2018 – GW2 - Downstream	6.11	1044	1	<1	3	7	16	<1	0.03	100	58	<100
23 November 2018 – GW 5 Upstream	6.38	630	<1	<1	1	<1	9	<1	0.02	92	22	<100
23 November 2018 - – GW2 - Downstream	6.44	966	<1	<1	2	2	11	<1	0.02	74	56	<100

2.2.7. Odour

During the 2018 calendar year, no odour complaints were made in relation to the development.

2.2.8. Dust

An Air Quality Management Plan was approved on 19 August 2016 for the construction phase of the development, and a further updated Air Quality Management Plan was prepared and approved by the Secretary of the Department of Planning and Environment on 26 February 2018 (Table 1.1). A series of dust minimisation and mitigation measures are used on the site to ensure that dust does not leave the premises.

Under Condition B16 of SSD5300, an Air Quality and Odour Audit (including dust) needs to be completed within three months of the approval of the Operational Environmental Management Strategy.

Air Quality and Odour Report was undertaken by Consulting Earth Sciences on between 22 and 24 May 2018 (report dated 25th May 2018). The report found that site activities were overall compliant.

2.2.9. Incidents

During the 2018 calendar year, no incidents occurred in relation to the development.

2.2.10. Complaints

During the 2018 calendar year, no complaints were received in relation to the development. All complaints are logged, published online² and are investigated. Kembla Grange Recycling Pty Ltd is unaware of any complaints received by the facility prior to its possession.

2.3. Non-compliance over the year and actions to ensure compliance (Condition C11(c))

The Annual Review provides a summary of non-compliances recorded during 2018 in Table 2.5. This table provides an overview of action that have been taken to address the non-compliance, and whether the non-compliance has been resolved.

Other non-compliances observed during the audit of operations on 12 March 2019 are given in Table 2.6. Action taken to resolve these non-compliances are given in the table.

The results suggest that actions taken have addressed most non-compliances during the year, and operations are being undertaken in accordance with the approved Operational Environmental Management Plans. It is noted that the site will be fully compliant with Condition A2(a)(c) and A9 of SSD5300 once the development modification is determined.

² Bingo Industries Complaint Register for Kembla Grange is published at:
<https://www.bingoindustries.com.au/getattachment/recycling-centres/recycling-centres-sydney-and-surrounds/KEMBLA-GRANGE/COMPLAINTS-REGISTER-EPL20601-11-03-2019.docx?lang=en-AU>

Table 2.5. Summary of non-compliances during 2018 and actions taken to ensure compliance.

Date of Notice	Regulatory Authority	Type of notice	Summary	Action taken to ensure compliance	Has this non-compliance been resolved?
26 April 2018	NSW Department of Planning and Environment	Warning Letter	The Department issued a Warning Letter for failing to comply with Schedule 2, Part B Condition B25(e). The Department has determined that on 26 April 2018, Kembla Grange Recycling failed to ensure that vehicles associated with the development are not parked and/or queued on the public road network, such as Wyllie Road Kembla Grange.	Drivers are not permitted and at no time have been advised to queue or park on the public road network. The requirement is for drivers to call ahead during peak periods to check queuing status. Kembla Grange Recycling continues to monitor this closely and provides ample parking and queuing areas on site.	Yes
27 April 2018	NSW EPA	Clean-Up Notice (Notice Number 1562257)	<p>The NSW EPA investigated a potential pollution incident involving the supply of approximately 12tonnes of recovered aggregate to at least 23 properties between 1 June 2017 and 3 August 2017 that was found to contain asbestos. The material was supplied by Wollongong Recycling (NSW) Pty Ltd.</p> <p>The placement of more than 10 tonnes of asbestos waste on land is a prescribed matter for the purposes of the definition of land pollution.</p> <p>The NSW EPA directed Wollongong Recycling (NSW) Pty Ltd to, as soon as possible and by no later than 5pm on 25 May 2018, remove and lawfully dispose of all recovered aggregate and the immediately surrounding soil that has had contact with the recovered aggregate containing asbestos at the Premises that was supplied by Wollongong Recycling (NSW) Pty Ltd in the relevant period.</p>	Clean-up works were completed, and documentation provided to the NSW EPA.	Yes
2 August 2018	NSW Department of Planning	Warning Letter	The Department issued a Warning Letter for failing to comply with Schedule 2, Part A Condition A2(d) and Part B Condition B14(a) and B14(vii). The Department determined that Kembla Grange	Kembla Grange Recycling is continuing to manage dust in accordance with the Air Quality Management Plan (Appendix A of the Operational Environmental Management Plan) This includes moistening of dry	Yes

Date of Notice	Regulatory Authority	Type of notice	Summary	Action taken to ensure compliance	Has this non-compliance been resolved?
	and Environment		Recycling failed to implement reasonable and feasible dust mitigation measures during adverse weather conditions at the facility on Thursday 31 May 2018 between 14:14 to 14:26.	surfaces in dry and hot conditions; limiting certain processing activities during windy conditions, and using the water cart to suppress dust on road surfaces during dry, hot and windy days. Additional sprinkler systems have been implemented	
22 November 2018	NSW Department of Planning and Environment	Penalty Notice	<p>The sorting/picking station was constructed and operated not in accordance with Conditions of Consent. It is an offence under section 4.2 and 9.52 of the Act for a person to carry out development otherwise than in accordance with the conditions of development consent.</p> <p>The Department determined that this is a breach of consent conditions Schedule 2, Part A, Condition A2(a)(c) and A9.</p>	A development application has been prepared for the use of the picking station and this was submitted for assessment on 31 August 2018.	No. DA Modification is under assessment by DPIE. The picking station will not be used until development approval is provided. Matter to be considered resolved once DA is approved.
20 December 2018	NSW Department of Planning and Environment	Development Control Order	The Development Control Order is given to Bingo, in accordance with Item 14 Part 1 of Schedule 5 of the EP&A Act to remedy a breach of a consent for State significant development. The terms of the Development Control Order are that Bingo must cease use of the sorting/picking station, identified in the aerial images in Attachment 1 of the Order, including infrastructure attached to the building.	A development application has been prepared for the use of the picking station and this was submitted for assessment on 31 August 2018.	No. DA Modification is under assessment by DPIE. The picking station will not be used until development approval is provided. Matter to be considered resolved once DA is approved.

Table 2.6. Non-compliances and recommendations to ensure compliance.

Non-compliance	Recommended actions / evidence required to ensure compliance
The 2017 Annual Review was not loaded to the website	Ensure that all records are loaded onto the website and a regular audit is undertaken to ensure all documents on the website are current. This document has since been uploaded to the website and is now in a compliant state.
Litter and storage near the riparian area	Building materials and litter were observed adjacent to the riparian area. This was cleaned up on the same day. It is recommended that Operational Environmental Management System and associated site inspection procedures are reviewed to ensure that the riparian management zone is inspected regularly and cleaned of any windblown litter.

An observation was made during the site inspection which relates to the stormwater and leachate ponds which have been lined with a plastic liner to better protect groundwater, and the batters of the pond sides have changed and they appear to be marginally different to the original ponds. However, it is noted that the ponds are generally in accordance with the consent.

2.4. Non-compliances from prior Annual Reviews and Independent Annual Audits

Table 2.7 provides a summary of non-compliances reported in the 2017 Annual Review and Independent Environmental Audits³ as provided to the Department of Planning and Environment. The table also summarises actions to close and ensure the non-compliances have been satisfactorily resolved.

Table 2.7. Non-compliances from the 2017 Annual Review and Independent Environmental Audit, and actions taken to ensure compliance.

Non-compliance	Action taken to ensure compliance	Has this non-compliance been resolved?
2017 Annual Review by Jackson Environment and Planning Pty Ltd		
The weather station was sighted during the site audit	Weather station has been installed and cited as being operational during the site inspection on 12 March 2019	Yes
Weighbridge office was not connected to the rainwater tank and outlet to drainage system as per SSD5300 MOD 1 plans, leading to collection of water under weighbridge	Works were inspected and noted to have been completed during the site inspection on 12 March 2019	Yes
Main warehouse was not connected to rainwater tanks as approved in SSD5300 plans; Batter on northern part of Site lacks vegetation and needs to be revegetated	Works were inspected and noted to have been completed during the site inspection on 12 March 2019	Yes
Operational Environmental Management Plan has not been uploaded to the website	OEMP is online and confirmed during the site inspection on 12 March 2019	Yes
Requirement to write to Office of Water to advise on change of ownership in May 2017	Copy of letter to Office of Water cited on 12 March 2019	Yes

³ It is noted that the first Independent Environmental Audit is still pending, awaiting approval by the audit team by the Department of Planning and Environment.

Non-compliance	Action taken to ensure compliance	Has this non-compliance been resolved?
CCTV camera was offline during inspection	CCTV camera was operational during the site inspection on 12 March 2019	Yes

2.5. Trends in the monitoring data over the life of the development (Condition C11(d))

This report is the first Annual Review for the development following the increase of waste receipt at the site as approved under Condition A6 of SSD5300. Given that minimal monitoring data is available at this stage, it is expected that in the next Annual Review, an analysis of trends in monitoring data will be possible.

2.6. Discrepancies between the predicted and actual impacts of the development and causes (Condition C11(e))

Monitoring in accordance with the approved OEMP has continued throughout the reporting period and there are no identified discrepancies between the predicted and actual impacts of the development.

2.7. Measures have or will be implemented in the current calendar year to improve the environmental performance of the development (Condition C11(f))

In 2018, the facility commenced a scale up in waste receipts during this time, an assessment of the effectiveness of the mitigation measures implemented under the Operational Environmental Management Plan was and were found to be effective, as evidence by the small number of minor non-compliances, no receipt of complaints and environmental performance within the Conditions of Consent.

2.8. Summary of Audit Recommendations

The audit found that Kembla Grange Recycling Pty Ltd has complied with all management plans and procedures as required by SSD5300 except for the non-compliances as identified in Table 2.5. Generally, the audit found that the site is being operated in a manner consistent with the planning consent.

3. Conclusion

An Annual Review report has been prepared for Kembla Grange Recycling Pty Ltd, owner and operator of a construction and demolition waste recycling facility located at 50 Wyllie Rd, Kembla Grange. Under Condition C11 of development consent SSD5300 operating at the site, the proponent is required to report to the Secretary of the Department of Planning and Environment on the environmental performance of the development. An Annual Review is required by the end of March each year.

As per the requirements of Condition C11, the report provides an overview of the environmental performance of the development by describing the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year. The report includes a review of the monitoring results and complaints records of the development over the last calendar year, including a comparison of the results against the:

- Relevant statutory requirements, limits or performance measures / criteria;
- Requirements of any plan or program required under the consent;
- Monitoring results of previous years; and
- The relevant predictions in the EIS.

The Annual Review also identifies any non-compliance over the last calendar year, and describe what actions were (or are being) taken to ensure compliance; identifies trends in the monitoring data over the life of the development; identifies and discrepancies between the predicted and actual impacts of the development and analyses the potential cause of any significant discrepancies. Furthermore, under the C11 consent condition, the proponent must describe what measures have or will be implemented in the current calendar year to improve the environmental performance of the development.

To inform the Annual Review, an assessment of compliance with the planning consent and environmental management requirements as specified in the following documents has been performed:

- State Significant Development (5300) Conditions of Consent;
- State Significant Development (5300) Statement of Commitments;
- State Significant Development (5300) Mod 1 Conditions of Consent;
- Department of Primary Industries Controlled Activity Approval;
- Environment Protection Licence 20601;
- Pollution Incident Response Management Plan; and
- Operational Environmental Management Strategy as approved by Department of Planning and Environment on 26/02/18 (including sub-environmental strategies).

A compliance audit was conducted on 12 March 2019. This involved a detailed desktop assessment of all management documentation, and a site inspection across the entire facility. Generally, the audit found that the site appears to be managed well and is in a compliant state.

Data available for assessment suggested that the facility is being managed within the predictions in the Environmental Impact Statement. It is noted that no complaints were received in the past 12 months in relation to the operations at the site.

Since the previous annual review, the Stage 1 construction works were completed (December 2017) with the final Occupation Certificate issued on 23 January 2018. A varied EPA licence for the completion of the development (Stage 1) and scale up in waste tonnages up to 230,000 tonnes per annum was approved on 6 April

2018 following the approval of the and approval of the Operational Environmental Management System by the Department of Planning and Environment.

In addition, an observation was made during the site inspection which relates to the stormwater and leachate ponds which have been lined with a plastic liner to better protect groundwater, and the batters of the pond sides have changed and they appear to be marginally different to the original ponds. However, it is noted that the ponds are generally in accordance with the consent.

It is recommended that dust continue to be regularly monitored in accordance with the management plans. Noise should also continue to be monitored in accordance with the management plans.

It was also observed, during the site visit, a small amount of building materials and litter adjacent to the riparian area. This was cleaned up on the same day as the inspection.

All non-compliances reported in the 2017 Annual Review have been resolved in full by the operator.

4. References

Documents reviewed as part of the audit:

- State Significant Development (5300) Conditions of Consent
- State Significant Development (5300) Statement of Commitments
- State Significant Development (5300) Mod 1 Conditions of Consent
- Department of Primary Industries Controlled Activity Approval
- Operational Environmental Management Strategy as approved by Department of Planning and Environment on 26/02/18 (including sub-environmental strategies:
 - Wollongong Recycling (NSW) Pty Ltd – Air Quality Management Plan (February 2018)
 - Wollongong Recycling (NSW) Pty Ltd – Asbestos Management Plan (February 2018)
 - Wollongong Recycling (NSW) Pty Ltd – Soil and Water Management Plan (February 2018)
 - Wollongong Recycling (NSW) Pty Ltd – Waste Monitoring Program (February 2018)
 - Wollongong Recycling (NSW) Pty Ltd – Pollution Incident Response Management Plan (February 2018)
 - Wollongong Recycling (NSW) Pty Ltd – Traffic Management Plan (February 2018)
 - Wollongong Recycling (NSW) Pty Ltd – Bushfire Management Plan (February 2018)

Appendix 1: Audit findings

A1.1: State Significant Development (SSD5300) Conditions of Consent

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
A5.	<p>Statutory Requirements</p> <p>The Applicant shall ensure that all licences, permits, and approvals/consents are obtained as required by law and maintained as required through the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approvals/consents.</p>	+ All approvals are in place for the development	+ Planning consent SSD5300 + EPA Licence 20601 + Department of Primary Industries Controlled Activity Approval	Yes
A6.	<p>Limits of Consent</p> <p>The Applicant shall not receive or process on the site more than 230,00 tonnes per calendar year of waste, subject to Condition A8</p>	+ Facility currently complying with EPA Licence 20601 limit condition of 230,000 tpa	+ EPA Licence 20601	Yes
A7.	<p>Despite Condition A7, the Applicant shall not receive or process on the site more than 30,000 tonnes per calendar year of waste until:</p> <ol style="list-style-type: none"> a Final Occupation Certificate has been issued for Stage 1 of the Development; and the Secretary has approved the Operational Environmental Management Strategy for the Development (see Condition C3). 	+ Facility has received final Occupation Certificate on 23/01/18 (Cert. No. 2306) + Secretary DPE approved OEMS on 26/02/18	+ Waste receipt limited by EPA Licence 20601 until EPL variation approved	Yes
A8.	<p>The Applicant shall store no more than 45,000 tonnes of waste on the site at any one time, including:</p> <ol style="list-style-type: none"> No more than 2,500m³ of organic waste on the site at any one time; and No more than 500m³ of the above limit on organic waste is to comprise compost product 	+ Site inspection of stockpiles on 12/03/19 + Site is limited to <2,500 m ³ of organic waste and <45,000 tonnes of waste at any point in time (Condition L3.2 and L3.3 of EPL 20601) + Assessment of WARRP reports for 2018 calendar year	+ Visual inspection of stockpiles on 12/03/19 + Assessment of WARRP reports for 2018 calendar year	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
A12	<p>Surrender of Consent</p> <p>In order for the development of land to proceed in a coordinated and orderly manner and to avoid potential conflicts with this consent, the Applicant shall and in the manner prescribed by clause 97 of the EP&A Regulation, surrender the development consent (DA-2009/1153, as modified) issued by Wollongong City Council described in Table 1 (of SSD5300) within 14 days of the issue of the Construction Certificate for the Development</p>	+ Letter from Wollongong City Council dated 3/11/16 confirming surrender of DA-2009/1153	+ Letter from Wollongong City Council dated 3/11/16	Yes
A13.	<p>Meteorological Monitoring</p> <p>Within 14 days of the issues of a Construction Certificate for the Development, the Applicant shall ensure that there is a suitable meteorological station on the site that complies with the requirements of the latest version of the Approved Methods for Sampling Air Pollutants in New South Wales. The Application shall operate the meteorological station for the life of the Development.</p>	+ Weather station is operational	+ Visual inspection on 12/03/19	Yes
B2	<p>Waste Management</p> <p>The Applicant shall implement a Waste Monitoring Program for the Development within 14 days of the issue of a Construction Certificate for the Development. The program must:</p> <ol style="list-style-type: none"> be prepared by a suitably qualified and experienced person(s); include suitable provision to monitor and record the: <ol style="list-style-type: none"> quantity, type and source of waste received on site; and quantity, type and quality of the outputs produced on site. ensure that: <ol style="list-style-type: none"> all waste that is controlled under a tracking system has the appropriate 	<p>+ Waste Monitoring Program as approved by the Secretary DPE on 26/02/18</p> <p>+ Bingo Training Needs Register sighted</p> <p>+ SOP-YA003 Asbestos at Recycling Centres procedure sighted</p> <p>+ OPL-YA040 Unexpected asbestos finds – site sighted</p>	<p>+ Waste Monitoring Program (Appendix D of Operational Environmental Management Plan)</p> <p>+ Bingo Training Needs Register</p> <p>+ SOP-YA003 Asbestos at Recycling Centres procedure</p> <p>+ OPL-YA040 Unexpected asbestos finds</p>	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<p>documentation prior to acceptance at the site; and</p> <p>(ii) staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste including asbestos.</p>			
B4	<p>Sewage Management</p> <p>The applicant shall obtain approval for the operation of an On-site Sewage Management System in Accordance with Section 68 of the <i>Local Government Act 1993</i>.</p>	+ OS-2015/15 Approval to Operate On-site Management System sighted from Wollongong City Council (dated 31/08/15)	+ OS-2015/15 Approval to Operate On-site Management System approval	Yes
B5.	<p>Water Management Plan</p> <p>Prior to the commencement of construction of the Development, the Applicant shall prepare a Water Management Plan to the satisfaction of the Secretary. The plan must:</p> <ol style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA and DPI; b) include a detailed site water balance; c) include a mass soil balance; d) include the details of: <ol style="list-style-type: none"> (i) retaining walls and soil cut and fill; (ii) expected groundwater interception and extraction; (iii) all-weather access to the site; (iv) clean water runoff areas that discharge without treatment (i.e. car parks and roofs) (v) the Water Management System for the site (see Condition B7); (vi) erosion and sediment controls (see Condition B8); (vii) bunding (see Condition B9); and 	+ Soil and Water Management Plan as approved by the Secretary DPE on 26/02/18. + Pollution Incident Response Management Plan sighted	+ Soil and Water Management Plan Program (Appendix C of Operational Environmental Management Plan) + Pollution Incident Response Management Plan	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	(viii) water management, monitoring, testing and incident response arrangements.			
B6.	<p>Water Management Plan</p> <p>The Applicant shall carry out the Development in accordance with the Water Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.</p>	+ Soil and Water Management Plan as approved by the Secretary DPE on 26/02/18	+ Soil and Water Management Plan (Appendix C of Operational Environmental Management Plan)	Yes
B7.	<p>Water Management System</p> <p>The Applicant shall operate a Water Management System for the site. The system must:</p> <ol style="list-style-type: none"> be designed by a suitably qualified and experienced person(s) in consultation with the EPA and Council; control surface water so that it does not mix with waste on the site; include surface water and leachate detention; be consistent with the guidance in Managing Urban Stormwater - Soils and Construction Vol. 1 (Landcom, 2004); divert clean surface water around operational areas of the site; include water quality monitoring that can determine the performance of the water management system against any EPL discharge limits; and include water reuse based on a risk assessment of environment and human health impacts. 	<p>+ Soil and Water Management Plan Program as approved by the Secretary DPE on 26/02/18</p> <p>+ Groundwater wells in place (x6) and data reported quarterly to Office of Water</p> <p>+ Daily Supervisor Checklist inspected for details on daily checks on water management system</p> <p>+ Roof water from weighbridge is connected to tank and outlet to drainage system as per SSD5300 MOD 1 plans, leading to collection of water under weighbridge</p> <p>+ Roof water from main warehouse is connected to tanks as approved in SSD5300 plans. Tanks to be reconnected.</p> <p>+ All other water management measures considered satisfactory.</p>	<p>+ Soil and Water Management Plan Program (Appendix C of Operational Environmental Management Plan)</p> <p>+ Site inspection across entire site</p> <p>+ Daily Supervisor Checklist</p>	Yes
B8.	<p>Erosion and Sediment Control</p> <p>The Applicant shall implement erosion and sediment control measures on-site in accordance with Managing Urban Stormwater: Soils and Construction Vol. 1 (Landcom, 2004).</p>	<p>+ Soil and Water Management Plan Program as approved by the Secretary DPE on 26/02/18</p> <p>+ Daily Supervisor Checklist inspected for details on daily checks of erosion and sediment controls</p> <p>+ Site inspection</p>	+ Soil and Water Management Plan Program (Appendix C of Operational Environmental Management Plan)	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
			+ Site inspection across entire site on 12/03/19 + Daily Supervisor Checklist	
B9.	Bunding The Applicant shall store all chemicals, fuels and oils used on-site in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling Liquids: Environmental Protection - Participant's Manual 2007.	+ All fuels, oils and chemicals were appropriately banded on spill containment pallets. + Note that 110% by volume of spill containment is required for oil drums on banded pallets. Avoid over stocking of oil drums on banded pallets.	+ Site inspection on 12/03/19 + Pollution Incident Response Management Plan (Appendix F, of Operational Environmental Management Plan)	Yes
B10.	Imported Soil The Applicant shall: <ul style="list-style-type: none"> a) ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the site; b) keep accurate records of the volume and type of fill to be used; and c) make these records available to the Department upon request. 	+ This requirement is documented in the Construction Waste Management Plan dated 10 May 2016 for the development + VENM and ENM used in construction occurred prior to Wollongong Recycling (NSW) Pty Ltd acquisition. No records are available to Wollongong Recycling (NSW) Pty Ltd and no evidence of non-compliance provided by previous site owner.	+ Construction Waste Management Plan dated 10 May 2016	Yes
B11.	Odour The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined under section 129 of the POEO Act).	+ Complaints register – no complaints in 12 months of reporting period + Air Quality Management Plan (Appendix A, Operational Environmental Management Plan)	+ Complaints register + Air Quality Management Plan + Site inspection on 12/03/19	Yes
B12.	Air Quality Management Plan Prior to the commencement of construction of the Development, the Applicant shall prepare an Air Quality Management Plan to the satisfaction of the Secretary. The plan must:	+ Air Quality Management (Appendix A, Operational Environmental Management Plan) is in place and addresses all requirements as per Condition B12 of the development consent + Plan has been approved by Department of Planning and Environment on 19 August 2016	+ Air Quality Management Plan	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<p>a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA;</p> <p>b) describe the measures that would be implemented to ensure:</p> <ul style="list-style-type: none"> (i) all reasonable and feasible measures are employed to minimise air emissions, including details of water sprays for stockpiles, exposed areas and the dust suppression system for the crushing plant; (ii) compliance with the relevant conditions of this consent; (iii) contingency measures are deployed to minimise impacts should adverse air emissions occur or appear likely to occur; <p>c) include well defined triggers for the deployment of construction and operational air quality measures;</p> <p>d) include well defined triggers for ceasing or partially ceasing operations on site during adverse air quality conditions; and</p> <p>e) include a protocol to determine the occurrence of an exceedance of any criteria in the EPL should an exceedance occur.</p>			
B13	<p>The Applicant shall carry out the Development in accordance with the Air Quality Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.</p>	<p>+ Air Quality Management Plan in place and approved by the Secretary 26/02/2018 (Appendix A of Operational Environmental Management Plan)</p> <p>+ Daily Site Supervisor Checklist sighted with details on air quality procedural checks</p>	<p>+ Air Quality Management Plan in place</p> <p>+ Daily Site Supervisor Checklist</p>	Yes
B14.	<p>Air Emissions Mitigation</p> <p>The Applicant shall:</p> <ul style="list-style-type: none"> a) operate the Development so that air emissions are minimised during all meteorological conditions; and 	<p>+ All waste processing operations on-site inspection on 12/03/19 appears to be compliant with consent condition and Operational Environmental Management Plan and Appendix</p>	<p>+ Operational Environmental Management Plan and Appendix A – Air Quality Management.</p>	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<p>b) implement best management practice, including all reasonable and feasible air and odour emissions mitigation measures to minimise emissions from the Development, including but not limited to:</p> <ul style="list-style-type: none"> (i) carrying out all composting on the site inside a fully enclosed building under negative atmospheric pressure; (ii) covering all finished compost or mulch that is stored outside a building with a suitable rain-proof cover; (iii) ensuring all paper, cardboard or plastic that is stored outside a building is within a compacted bale or covered enclosure; (iv) ensuring any stockpile of organic waste stored outside a building is 3 metres in height or less; (v) ensuring any stockpile of inorganic waste stored outside a building is 5 metres in height or less; (vi) storing no more than 2,500 m³ of organic matter outside a building at any one time, comprising of no more than: <ul style="list-style-type: none"> • 1,000m³ of unprocessed green waste; • 1,000m³ of mulches; and • 500m³ of compost; (vii) storing no more than 300 tonnes of firewood outside a building at any one time; and (viii) dust suppression using chemical suppressants, water sprays/misters. 	<p>A – Air Quality Management. As approved by Secretary</p> <p>+ No composting activities inside building are currently being performed.</p> <p>+ Only mulching and temporary storage on bunded pad outdoors in designated storage area.</p> <p>+ Surface wetting of piles observed for dust control.</p> <p>+ Dust gauges in place on boundaries (x4)</p>	<p>+ Site inspection on 12/03/19.</p>	

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
B15.	<p>Construction Emissions Mitigation</p> <p>During construction, the Applicant shall ensure that:</p> <ul style="list-style-type: none"> a) all vehicles on site do not exceed a speed of 30 kilometres per hour; b) all loaded construction vehicles entering or leaving the site have their loads covered; and c) all construction vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking the materials on public roads. 	<ul style="list-style-type: none"> + Construction works completed prior to inspection on 12/03/19. + Construction process managed as per approved Construction Environment Management Plan dated 9/05/16 by KFW 	<ul style="list-style-type: none"> + Construction Environment Management Plan. 	Yes
B16	<p>Air Quality and Odour Audit</p> <p>The Applicant shall carry out an Air Quality and Odour Audit of the Development no later than three months after the Secretary has approved the Operational Environmental Management Strategy (refer to Condition C3) for the Development. The audit must:</p> <ul style="list-style-type: none"> a) be carried out by a suitably qualified and experienced expert whose appointment has been endorsed by the Secretary; b) audit the Development whilst it is in operation; c) include a summary of air and odour emission related complaints and any actions that were carried out to address the complaints; d) validate the Development against air quality and odour predictions in the EIS; e) review design and management practices of the Development against industry best practice for air emissions and odour management; and f) include an action plan that identifies and prioritises additional air and odour emission mitigation measures that may be necessary to reduce air emissions. 	<ul style="list-style-type: none"> + Air Quality and Odour Report was undertaken by Consulting Earth Sciences on between 22 and 24 May 2018 	<ul style="list-style-type: none"> + Air Quality and Odour Audit Report dated 25th May 2018. 	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
B18.	<p>Construction and operation hours</p> <p>The Applicant shall comply with the construction and operation hours in Table 2 (of SSD-5300) unless otherwise agreed to in writing by the Secretary.</p>	<p>+ Construction works completed prior to inspection on 12/03/19.</p> <p>+ Construction process managed as per approved Construction Environment Management Plan dated 9/05/16 by KFW.</p>	<p>+ Construction Environment Management Plan</p> <p>+ Advice provided by Bingo Environmental Manager</p>	Yes
B20.	<p>Noise criteria</p> <p>The Applicant shall ensure that noise generated by the Development does not exceed the noise criteria in Table 3 (of SSD5300).</p>	<p>+ Noise managed in accordance with procedure OPL-YA027 Controlling Noise Emissions at Recycling Centres</p> <p>+ No complaints as per Complaints Register</p>	<p>+ OPL-YA027 Controlling Noise Emissions at Recycling Centres</p> <p>+ Complaints Register</p>	Yes
B21.	<p>Noise compliance measurement</p> <p>Noise generated by the Development is to be measured in accordance with the relevant requirements and exemptions (including certain meteorological conditions) of the latest version of the NSW Industrial Noise Policy.</p>	<p>+ Noted</p> <p>+ Updated noise monitoring performed by GHD in September 2018 in accordance with the new NSW EPA Noise Policy for Industry.</p>	<p>+ GHD Noise Assessment (October 2018)</p>	Yes
B22.	<p>Vibration criteria</p> <p>The Applicant shall ensure that vibration resulting from the Development does not exceed the continuous or impulsive vibration criteria in EPA's Assessing Vibration: A Technical Guideline (February 2006) at residential receivers.</p>	<p>+ Vibration managed in accordance with procedure OPL-YA027 Controlling Noise Emissions at Recycling Centres</p> <p>+ No complaints as per Complaints Register</p>	<p>+ OPL-YA027 Controlling Noise Emissions at Recycling Centres</p> <p>+ Complaints Register</p>	Yes
B23.	<p>Noise mitigation</p> <p>The Applicant shall:</p> <ol style="list-style-type: none"> implement best management practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the Development; minimise the noise impacts of the Development during adverse meteorological conditions; maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and 	<p>+ Noise managed in accordance with procedure OPL-YA027 Controlling Noise Emissions at Recycling Centres</p> <p>+ Noise loggers not in place</p> <p>+ No complaints as per Complaints Register for previous 12 months</p>	<p>+ OPL-YA027 Controlling Noise Emissions at Recycling Centres</p> <p>+ Complaints Register</p> <p>+ GHD Noise Assessment (October 2018)</p> <p>+ Noise monitoring unit fitted to the Weather station and is used to identify and limit noisy activity</p>	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	d) regularly assess noise monitoring data and relocate, modify and/or stop operations to ensure compliance with the noise criteria in this consent.			
B24.	Noise monitoring The Applicant shall carry out any noise monitoring required by the EPL	+ No noise monitoring required under EPL 20601	+ EPL 20601 + GHD Noise Assessment (October 2018)	Yes
B26.	Fire Management The Applicant shall: a) implement suitable measures to minimise the risk of fire on the site; b) extinguish any fires on the site promptly; and c) maintain adequate fire-fighting capacity on the site at all times.	+ Fire safety systems approved under Occupation Certificate from Illawarra Building Certifiers on 23/01/18 (Cert. No. 2306) + Drills conducted as per Pollution Incident Response Management Plan (last tested 07/05/18)	+ Occupation Certificate + Pollution Incident Response Management Plan	Yes
B29.	Landscape Management Plan Prior to the commencement of construction of the Development, the Applicant shall prepare a Landscape Management Plan in consultation with the Office of Water, to the satisfaction of the Secretary. The plan must: a) be prepared by a suitably qualified and experience person(s); b) detail the measures to be employed to address the requirements of Condition 830; c) describe and map the extent of the Riparian Zone for the un-named tributary on the site; d) be consistent with the Vegetation Management Plan, Version 7, dated October 2015, prepared by Southern Habitat; e) include: (i) a schedule of proposed planting, including botanic and common names, expected mature height and staking requirements, numbers of plants and pot sizes;	+ Site landscaping managed in accordance with approved Operational Environmental Management Plan – Appendix C- Soil and Water Management Plan. + Contract landscaper currently being engaged to manage maintenance of all landscaped areas + Site inspection identified weed growth in riparian corridor, and to be managed by landscape contractor (Southern Habitat)	+ Operational Environmental Management Plan – Appendix C- Soil and Water Management Plan. + Site inspection 12/03/19	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<ul style="list-style-type: none"> (ii) the location of all proposed and existing overhead and underground service lines, with all service lines clear of the drip lines of existing and proposed trees; (iii) the location of common taps and/or irrigation system in accordance with Wollongong City Council Landscape Technical Policy No 98/4; (iv) the details of protection measures for existing vegetation to be retained; and (v) a landscape maintenance program for the operational life of the facility. 			
B30.	The Applicant shall carry out the Development in accordance with the Landscape Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary	+ Landscape Management Plan (as per approved Operational Environmental Management Plan – Appendix C- Soil and Water Management Plan) + Maintenance report provided by Southern Habitat 29/03/19.	+ Landscape Management Plan (as per approved Operational Environmental Management Plan – Appendix C- Soil and Water Management Plan) + Maintenance report provided by Southern Habitat 29/03/19.	Yes
B31.	<p>Landscaping The Applicant shall:</p> <ul style="list-style-type: none"> a) ensure that all works are consistent with the Vegetation Management Plan, Version 7, dated October 2015, prepared by Southern Habitat; b) ensure that the <i>Ficus macrophylla</i> (Moreton Bay Fig) and <i>Streb/us brunonianus</i> (Whalebone Tree) described in Drawing No.1442-LC01G, prepared by Ochre Landscape Architects dated 12 August 2015, are retained and protected during construction; 	<ul style="list-style-type: none"> + Site landscaping managed in accordance with approved Operational Environmental Management Plan – Appendix C- Soil and Water Management Plan. + Southern Habitat engaged to manage maintenance of all landscaped areas. + Site inspection on 12/03/19. 	<ul style="list-style-type: none"> + Operational Environmental Management Plan – Appendix C- Soil and Water Management Plan. + Site inspection 12/03/19 + Maintenance report provided by Southern Habitat 29/03/19. 	Yes.

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<ul style="list-style-type: none"> c) install a permanent physical barrier at the landward extent of the riparian zone to prevent damage to the riparian zone; d) ensure that the riparian zone is landscaped with fully structured native vegetation that emulates the local vegetation community; e) ensure that washing of equipment or disposing of building materials, does not occur within the drip line of any tree nominated for retention; f) ensure that appropriate tree protection measures are employed for the entirety of the excavation and construction phases of the Development, including: <ul style="list-style-type: none"> (i) 1.8-metre-high cyclone chain mesh fence, with posts and portable concrete footings; and (ii) mulching of tree protection zones with 75 millimetres of mulch; and g) install permeable surfaces (in accordance with the manufacturer's recommendations) for any proposed hard surface under the canopy of existing trees, with finished surface levels matching existing levels. 			
C1.	<p>Construction Environmental Management Plan Prior to the commencement of construction of the Development, the Applicant shall prepare a Construction Environmental Management Plan to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s); b) describe all activities to be undertaken on the site during construction, including a clear indication of construction stages; 	<p>+ Construction works completed prior to inspection on 12/03/19 + Construction process managed as per approved Construction Environment Management Plan dated 9/05/16 by KFW</p>	<p>+ Construction Environment Management Plan + Advice provided by Environmental Manager</p>	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<ul style="list-style-type: none"> c) identify the statutory approvals that apply to the Development; d) outline all environmental management practices and procedures to be followed during construction (e.g. construction traffic management and construction noise and vibration management), including all reasonable and feasible mitigation measures to protect the amenity of the surrounding environment; e) detail how the environmental performance of construction will be monitored, and what actions will be taken to address identified adverse environmental impacts; f) describe the roles and responsibilities for all relevant employees involved in construction; g) include arrangements for community consultation and complaints handling procedures during construction; and h) consolidate the construction related parts of any management plans and monitoring programs required in the conditions of this consent. 			
C2.	The Applicant shall carry out the Development in accordance with the Construction Environmental Management Plan approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	<ul style="list-style-type: none"> + Construction works completed prior to inspection on 12/03/19. + Construction process managed as per approved Construction Environment Management Plan dated 9/05/16 by KFW. 	<ul style="list-style-type: none"> + Construction Environment Management Plan + Advice provided by Bingo Environmental Manager 	Yes
C3.	<p>Operational Environmental Management Strategy</p> <p>The Applicant shall prepare an Operational Environmental Management Strategy for the Development to the satisfaction of the Secretary. This strategy must:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s); 	+ Operational Environmental Management Strategy approved by Secretary on 26/02/18, fully addressing all C3 consent condition requirements	+ Operational Environmental Management Strategy	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	b) provide a strategic framework for environmental management of the Development; c) identify the statutory approvals that apply to the Development; d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development; e) describe in general how the environmental performance of the Development would be monitored and managed; and f) describe the procedures that would be implemented to: <ul style="list-style-type: none"> (i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; and (v) respond to emergencies. 			
C4.	The Applicant shall carry out the Development in accordance with the Operational Environmental Management Strategy approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	+ Operational Environmental Management Strategy approved by Secretary 26/02/18	+ Operational Environmental Management Strategy	Yes
C5.	Management Plan Requirements The Applicant shall ensure that the environmental management plans/strategies required under this consent are prepared in accordance with any relevant guidelines and include: <ul style="list-style-type: none"> a) detailed baseline data; b) a description of: 	+ Operational Environmental Management Strategy approved by Secretary 26/02/18	+ Operational Environmental Management Strategy	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<ul style="list-style-type: none"> (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures/criteria; (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures; (iv) the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; c) a program to monitor and report on the: <ul style="list-style-type: none"> (i) impacts and environmental performance of the Development; (ii) effectiveness of any management measures; (iii) a contingency plan to manage any unpredicted impacts and their consequences; (iv) a program to investigate and implement ways to improve the environmental performance of the Development over time; d) a protocol for managing and reporting any: <ul style="list-style-type: none"> (i) incidents; (ii) complaints; (iii) non-compliances with statutory requirements; and (iv) exceedances of the impact assessment criteria and/or performance criteria; and (v) a protocol for periodic review of the plan. 			
C7.	<p>Incident Reporting The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident</p>	+ Incident reporting given in the Operational Environmental Management Strategy approved by Secretary 26/02/18	+ Operational Environmental Management Strategy	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the Development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	+ Pollution Incident Response Management Plan + Incident reporting system on Bingo intranet	+ Bingo Intranet for Incident Reporting	
C8.	Regular Reporting The Applicant shall provide regular reporting on the environmental performance of the Development on a website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	+ Reporting given in the Operational Environmental Management Strategy approved by Secretary on 26/02/18 + The 2017 Annual Review was not loaded to the web site	+ Operational Environmental Management Strategy + Bingo web site	Yes
C9.	Independent Environmental Audit Within 1 year of the Secretary's approval of the Operational Environmental Management Strategy for the Development, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must: a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; b) led by a suitably qualified auditor, and include experts in fields specified by the Secretary; c) include consultation with the relevant agencies; d) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPU's (including any assessment, plan or program required under the approvals);	+ Noted + Independent audit to be arranged by mid-2019	+ N/a	N/a

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	e) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and f) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.			
C10.	Within 6 weeks of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	+ Noted. + Independent audit to be arranged by mid-2019	+ N/a	N/a
C11.	Annual Review By the end of March each year or as otherwise agreed with the Secretary, the Applicant shall review the environmental performance of the Development. This review must: <ul style="list-style-type: none"> a) describe the Development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over current calendar year; b) include a comprehensive review of the monitoring results and complaints records of the Development over the last calendar year, which includes a comparison of the results against the: <ul style="list-style-type: none"> (i) the relevant statutory requirements, limits or performance measures/criteria; (ii) requirements of any plan or program required under this consent; (iii) the monitoring results of previous years; and (iv) the relevant predictions in the EIS; c) identify any non-compliance over the last calendar 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 Development; 	+ This report addresses the requirements of Condition C11 of SSD5300	+ N/a	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<p>e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and</p> <p>f) describe what measures have or will be implemented in the current calendar year to improve the environmental performance of the Development.</p>			
C12	<p>Revision of Strategies, Plans and Programs Within 3 months of the submission of an:</p> <p>a) annual review under Condition C11 above; b) incident report under Condition C7 above; c) audit under Condition C9 above; or d) any modification to this consent,</p>	<p>+ Noted. + No change in management plans was required during 2018.</p>	+ N/a	N/a
C14.	<p>Access to Information The application shall make copies of the following publicly available on its website:</p> <p>a) the documents referred to in Condition A2; b) all current statutory approvals for the development; c) all approved strategies, plans and programs required under the conditions of this consent; d) a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; e) a complaint register, updated monthly; f) the annual reviews of the Development; g) any independent environmental audit of the Development, and the Applicants response to the recommendations in any audit; and h) any other matter required by the secretary; and i) keep this information up to date.</p>	+ All documents under SSD Condition A2 are provided on publicly available web sites	<p>+ EIS, Response to Submissions, site layout plans and drawings and management and mitigation measures + EPA licence + Complaints Register + OEMP</p>	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
Revised Statement of Commitments 4.1	<p>Geotechnical Design Solutions, Works and Investigations</p> <p>The following recommendations to address geotechnical constraints will be implemented by Bicorp:</p> <ol style="list-style-type: none"> 1) As part of site preparation prior to construction works, all vegetation, topsoil and any uncontrolled fill will be removed. 2) Temporary surface protection against erosion will be provided in accordance with the requirements of the supervising geotechnical engineer. 	<p>+ Construction works completed prior to inspection on 12/03/19.</p> <p>+ Construction process managed as per approved Construction Environment Management Plan dated 9/05/16 by KFW.</p>	<p>+ Construction Environment Management Plan</p>	Yes
Revised Statement of Commitments 4.2	<p>Groundwater</p> <p>The following will be implemented by Bicorp in relation to groundwater monitoring and reporting:</p> <ol style="list-style-type: none"> 1) Groundwater presence or levels will be confirmed if construction is undertaken during or following adverse weather or if a significant time period elapses between this investigation and construction. The Office of Water will be notified prior to any works occurring that are likely to intercept or extract groundwater and an estimate of the likely take of groundwater will be provided to the Office of Water to assess the need for an authorisation. 2) Quarterly Testing of the groundwater on the site will be undertaken to identify any future trends and characterise the groundwater within the local area. Monitoring will commence at least three months prior to construction commencing and the results of the groundwater monitoring programme will be provided to the Office of Water. 3) Development of a Soil and Water Management Plan to minimise the amount of surface runoff and potential migration of contamination. 	<p>+ Groundwater testing undertaken quarterly consistent with Appendix C - Soil and Water Management Plan as per Operational Environmental Management Plan approved by the Secretary 26/02/18</p> <p>+ Construction process managed as per approved Construction Environment Management Plan dated 9/05/16 by KFW</p>	<p>+ Appendix C Soil and Water Management Plan as per Operational Environmental Management Plan</p> <p>+ Construction Environment Management Plan</p> <p>+ Groundwater monitoring reports from Consulting Earth Sciences (May, August and November 2018)</p>	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	4) Engineering of the development working platform to minimise the infiltration of any contaminants into the underlying soils.			
Revised Statement of Commitments 4.3	<p>Hazards The following measures will be implemented by Bicorp to address hazards associated with transport, construction, on site storage of fuels/hydrocarbons, and site operation in relation to dust, bushfire and theft:</p> <ol style="list-style-type: none"> 1) Preparation of an Emergency Management/Response Plan. 2) Preparation of an Environmental Management Plan. 3) Preparation of a Work Health and Safety Plan. 4) Preparation of a Hazardous Material Management Plan. 5) Appropriate induction and training of personnel and the implementation of operator training. 6) The purchase of spill response equipment and the implementation of spill response training. 7) Emergency services (police, fire brigade) will be contacted when required. 8) The implementation of site security to limit public access, as required. 9) Procurement of firefighting equipment adequate for the level of risk and regular maintenance and testing of such equipment. 10) Preparation of a Bushfire Management Plan. 11) Regular maintenance inspections of equipment. 12) The preparation of a Traffic Management Plan. 13) Implementation of procedures to ensure that handling and storage of flammable and combustible liquids is in accordance with Australian Standards. 	<p>+ (1) Pollution Incident Response Management Plan sighted in Appendix F of Operational Environmental Management Plan approved by the Secretary 26/02/18. + Emergency response procedures given in Section 13 of Operational Environmental Management Plan approved by the Secretary 26/02/18. + (2) EMS System under ISO 14001 in place and certified by Best Practice Industry Certification, Cert. No 72617748231E (expiry 18/02/2021) + (3) WHS System in place under AS4801 and independently audited and certified by Best Practice Industry Certification, Cert. No 72617748231S (expiry 18/02/2021) + (4) Pollution Incident Response Management Plan sighted in Appendix F of Operational Environmental Management Plan approved by the Secretary 26/02/18. + (5) Sighted procedure SOPCOM005 Induction, Competence, Training and Awareness + (6), (7) Pollution Incident Response Management Plan sighted in Appendix F of Operational Environmental Management Plan approved by the Secretary 26/02/18. + (8) Section 14 of Operational Environmental Management Plan approved by the Secretary 26/02/18. + (9), (10) Bushfire Management Plan in Appendix I of Operational Environmental</p>	+ Refer to evidence sighted	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<p>14) Storage and handling of all substances, including waste, under conditions that minimise the risk of fire, explosion or toxic emissions, with implementation of specific measures that address the use of solvent extraction reagents.</p> <p>15) Implementation of specific procedures for high risk tasks.</p> <p>16) Appropriate induction and training of personnel in emergency response (internal and external) procedures.</p> <p>17) Ongoing communication with agencies such as Rural Fire Services and monitoring of risk levels in relation to fire danger ratings.</p> <p>18) Vacuuming and sweeping of site, as required.</p> <p>19) Procurement of spill and water cart equipment adequate for the level of risk identified for the project and regularly maintained and tested to ensure good working order.</p> <p>20) If a major failure of air quality management systems occurs, processing will cease at the facility until the management system is repaired and operational.</p>	<p>Management Plan approved by the Secretary 26/02/18.</p> <p>+ (11) Air Quality Management Plan as per Appendix A of Operational Environmental Management Plan approved by the Secretary 26/02/18.</p> <p>+ (12) Traffic Management Plan in Appendix H of Operational Environmental Management Plan approved by the Secretary 26/02/18.</p> <p>+ (13) Waste Monitoring Program as per Appendix D of Operational Environmental Management Plan approved by the Secretary 26/02/18</p> <p>+ (14), (15) Sighted procedure ‘SWMS009 – Recycling Centre Operations’</p> <p>+ (16) Sighted procedure ‘SWMS013 – Ground staff, traffic control and tip floor management’</p> <p>+ (17) Pollution Incident Response Management Plan sighted in Appendix F of Operational Environmental Management Plan approved by the Secretary 26/02/18</p> <p>+ (18) Soil and Water Management Plan as per Appendix C of Operational Environmental Management Plan approved by the Secretary 26/02/18.</p> <p>+ (19) Sighted the site’s Daily Site Supervisor Checklist</p> <p>+ (20) Air Quality Management Plan as per Appendix A of Operational Environmental Management Plan approved by the Secretary 26/02/18.</p>		

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
Revised Statement of Commitments 4.4	<p>Biodiversity</p> <p>Bicorp commit to the implementation of the following biodiversity protection measures:</p> <ol style="list-style-type: none"> 1) Retention of remnant intact native vegetation / endangered ecological communities. 2) Erection of a standard three strand wire fence around the extent of the Illawarra Subtropical Rainforest located within the area of workings to indicate and protect this particular remnant. A buffer zone of 5m will apply within this fencing. 3) Retention of identified hollow bearing trees. 4) Retention of a 1 Om wide vegetated riparian corridor to protect aquatic habitats. 5) Retention of identified hollow bearing tree. 6) Revegetation of disturbed batters and landscape areas with native flora species. 7) Undertaking of weed management in accordance with the requirements of the Noxious Weeds Act (1993). 8) Removal of vegetative matter from earth moving machines prior to entering and leaving the site 9) Undertaking of weed management of the vegetated riparian buffer area in accordance with the Vegetation Management Plan prepared by Southern Habitat (Version 6, dated August 2015) 10) Rapid revegetation and/or stabilisation of disturbed areas. 11) Remove windblown rubbish. 	<p>+ Occupation Certificate as approved by Illawarra Building Certifiers 23/01/18 (Cert. No. 2306)</p> <p>+ Construction Environment Management Plan dated 9/05/16 by KFW</p> <p>+ Site inspection on 12/03/19 provided evidence of SOC 4.4 Commitments in place</p> <p>+ Landscape contractor to be engaged to ensure vegetation associated with riparian corridor is managed in accordance with Vegetation Management Plan, including weed removal</p>	<p>+ Occupation Certificate</p> <p>+Construction Environment Management Plan</p> <p>+ Site inspection 12/03/19</p>	Yes
Revised Statement of Commitments 4.5	<p>Vegetation</p> <ol style="list-style-type: none"> 1) The following will be implemented by Bicorp to protect the Moreton Bay Fig on the site: <ul style="list-style-type: none"> • Retention of a reserve as shown on the Landscape Plan dated August 2015. 	<p>+ Occupation Certificate as approved by Illawarra Building Certifiers 23/01/18 (Cert. No. 2306)</p> <p>+ Site inspection on 12/03/19 provided evidence of Vegetation Management Plan is in place</p>	<p>+ Occupation Certificate</p> <p>+ Site inspection 12/03/19</p>	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<ul style="list-style-type: none"> • Removal of the Hickory Wattles 4 & 5 (simply by cutting out with a chainsaw, not heavy machinery) which will disrupt the Fig's roots. • Removal of the Lantana infestation. • Retention of the small Whalebone Tree east of the Fig, and the young Moreton Bay Fig about 7m south - west of the Fig. • Secure quarantining of the Fig's reserve on the works (i.e. east) side with a steel picket and ribbon fence (known as a Tree Protection Zone/TPZ exclusion fence). • No works (apart from Lantana & Hickory removal) to be undertaken within this zone. <p>2) The Restoration Plan of Action, as contained in the Vegetation Management Plan, updated by Southern Habitat in August 2015 will be implemented.</p> <p>3) A two (2) year maintenance programme will commence following completion of primary weed control and revegetation throughout the riparian corridor. Following this maintenance period and final report, the ongoing maintenance shall continue for the operational life of the facility. The maintenance will require the compilation and submission of an annual report to NSW Office of Water and must be prepared by a suitably qualified person/organisation. The annual report must include but is not limited to site conditions including:</p> <ul style="list-style-type: none"> • Weed cover percentage • Native cover percentage 	<p>+ Final mulching of replanted areas done in January 2018</p> <p>+ Landscape contractor to be engaged to ensure vegetation associated with riparian corridor is managed in accordance with Vegetation Management Plan, including weed removal. This contract will be for an initial 2-year maintenance program</p>		

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<ul style="list-style-type: none"> Identification and determination of actions to remedy any issues pertaining to the ongoing maintenance of the riparian vegetation for the 12 months following the report 			
4.6	<p>Bushfire The following bushfire mitigation and protection recommendations will be adhered to by Bicorp:</p> <ol style="list-style-type: none"> The stockpiling and loading area for green waste and timber is to be confined to the western and south-western sides of the 'Indoor Processing & Storage Shed' over 100m from the riparian area or within the Indoor Processing & Storage Shed The development will be serviced by a static water supply to meet the PBP requirement for a minimum amount of 20,000 litres for firefighting purposes. The water supply will be visible and readily accessible to fire fighting vehicles and a suitable connection for Rural Fire Service purposes will be made available (65 mm Storz fitting). The supply will be accessible to within 3m by firefighting appliances. 	<p>+ Site inspection on 12/03/19 confirmed correct storage of green waste and timber + 2 x 100,000L water tanks in place for fire fighting</p>	+ Site inspection	Yes
4.8	<p>Environmental and Amenity Impacts The following flood mitigation and water quality measures will be implemented by Bicorp:</p> <ol style="list-style-type: none"> Up to three 100,000L rainwater tanks in addition to a permanent pool to provide for dust suppression Use of recycled crushed concrete in road pavements and hardstand areas to promote infiltration and reduce the volume of surface runoff. Provision of two OSD basis, one on either side of the watercourse Capture of hydrocarbon, including two Rocla downstream defenders to capture hydrocarbons in 	<p>+ (1) Only 2 x 100,000 L tanks in place as per SSD5300 + (2), (3), (4) As per SSD5300 plans and confirmed in site inspection on 12/03/19. + (5) Refer to Appendix C of Operational Environmental Management Plan as approved by the Secretary 26/02/18.</p>	+ Site inspection + Operational Environmental Management Plan	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<p>oil and grease from runoff. A Humeceptor is also to be installed upstream.</p> <p>5) Implementation of an Operation and Maintenance Plan for WSUD in regard to weekly and monthly inspection and maintenance, as well as after every rainfall event >25mm, in addition to six monthly inspections and maintenance.</p>			
4.9	<p>Dust and Odour Management</p> <p>The following general dust mitigation will be implemented:</p> <ol style="list-style-type: none"> 1) Material will be watered prior to it being loaded for haulage, where appropriate. 2) Watering of truck turn around and reversing areas will be undertaken with at least 2L/m²/hr as required to control dust emissions. Any other areas that are visible sources of dust will be appropriately watered until dust impact is no longer an issue. 3) Chemical Dust suppressant spraying will be undertaken on the unsealed access road from the site office into the site. This will be undertaken as per the supplier's requirements. Additional dust suppression will be applied if dust from the road is visibly observed to be leaving the site boundary. 4) A dust suppression system will be installed and operated for the crushing plant. The system will be operated as per manufacturers' specification and used whenever dust from the crusher has the potential to be transported offsite in the direction of sensitive receptors. 5) The size of storage piles will be minimised where possible. 	<p>+ Procedures for dust and odour management are given in the Operational Environmental Management Plan as approved by the Secretary on 26/02/18 (refer to Appendix A – Air Quality Management Plan).</p> <p>+ (1) Water supply observed during site inspection on 12/03/19, but not in use due to wet weather.</p> <p>+ (2) Water cart observed during site inspection on 12/03/19, but not in use due to wet weather. Sweeper attached to bobcat used for cleaning road surfaces on entry to the site.</p> <p>+ (3) Chemical dust suppressants not used on the site.</p> <p>+ (4) Crushers are fitted with water sprays to minimize dust generation.</p> <p>+ (5) Storage piles are minimized and his was observed during the site inspection on 12/03/19 where pile heights were compliant with consent conditions.</p> <p>+ (6) – (11) Practices were observed during the site inspection on 12/03/19. Grinding operations were halted on site on day of inspection due to excessive wind, to avoid dust generation.</p> <p>+ (12) Indoor composting plant not used.</p>	<p>+ Operational Environmental Management Plan</p> <p>+ Site inspection on 12/03/19.</p> <p>+ Interview with Site Supervisor and Environmental Manager</p>	Yes

SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<p>6) Cleared areas of land will be limited and cleared only when necessary to reduce fugitive dust emissions.</p> <p>7) On site traffic will be controlled by designating specific routes for haulage and access and limiting vehicle speeds to below 25 km/hr.</p> <p>8) All trucks hauling material should be covered before exiting the site and should maintain a reasonable amount of vertical space between the top of the load and top of the trailer.</p> <p>9) Material spillage on sealed roads will be cleaned up as soon as practicable.</p> <p>10) A rumble-strip at the interface of the sealed road and the unsealed access road will be provided.</p> <p>11) Excavating operations conducted in areas of low moisture content material will be suspended during high wind speed events or water sprays will be used.</p> <p>The following odour mitigation measures will be implemented:</p> <p>12) Design and installation of an appropriate building ventilation system at negative pressure at all times during operation.</p> <p>13) A site odour management plan be developed prior to commissioning the facility with the increased capacity.</p> <p>14) On site storage times of organic material will be minimised prior to processing.</p> <p>15) If the chosen composting process allows, the matured compost stockpiles will be covered to reduce the ingress of water and reduce odour.</p> <p>16) If the leachate pond is a significant source of odour Bicorp will investigate the use of aerators to</p>	<p>+ (13) Refer to Operational Environmental Management Plan as approved by the Secretary on 26/02/18 (Appendix A – Air Quality Management Plan).</p> <p>+ (14) Minimal stockpiles of organic materials were observed during site inspection on 12/03/19. Site supervisor advised stockpiles of materials are minimized and product moved off site to ensure compliance with consent conditions in terms of volumes stored and pile height.</p> <p>+ (15) No composting done on site, and no covers are needed on outdoor stockpile of shredded material.</p> <p>+ (16) No odour was detectable from leachate dam during site inspection on 12/03/19.</p> <p>+ (17) – (19) Not progressed as composting plant not currently used.</p>		



SSD5300 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
	<p>minimise odour, enhance biological degradation and encourage evaporation.</p> <p>17) Validation sampling of odour from any key odour discharge points will be undertaken after commissioning.</p> <p>18) Annual odour sampling of the building ventilation stack will be undertaken.</p> <p>19) If required (as demonstrated by annual odour sampling), all air will be treated in an odour control system prior to discharge.</p>			

A1.2: State Significant Development (5300) Mod 1 Conditions of Consent

SSD5300 Mod 1 Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor	Compliant? (Y/N)
A2.	<p>Terms of Consent</p> <p>The Applicant shall carry out the Development in accordance with the:</p> <ul style="list-style-type: none"> a) EIS b) Response to Submissions c) Site layout plans and drawings (Appendix A of SSD5300) d) Management and Mitigation Measure (Appendix B of SSD5300) e) <u>The S96(1A) Modification Application to SSD5300 prepared by Jackson Environment and Planning</u> 	<p>+ Site inspection on 12/03/19 found that the site has been constructed and operated consistent with SSD5300 and SSD5300 Mod 1</p> <p>+ Facility has received final Occupation Certificate on 23/01/18 (Cert. No. 2306)</p>	<p>+ Site inspection on 12/03/19</p> <p>+ All consent documentation</p>	Yes

A1.3: Department of Primary Industries Controlled Activity Approval

Department of Primary Industries Controlled Activity Approval Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor – Jackson Environment and Planning Pty Ltd	Compliant? (Y/N)
2	The approval holder must not transfer this Controlled Activity Approval 10 ERM2009/1008 without the written approval of DPI Water.	+ Noted	+ N/a	Yes
3	The approval holder must keep a copy of the current Controlled Activity Approval 10 ERM2009/1008 on site at all times and make this approval available to officers from DPI Water on request.	+ Controlled Activity Approval kept on file at the site	+ Site inspection and view of record 12/03/19.	Yes
5	The approval holder must notify DPI Water in writing within 14 calendar days of any change (i) site management; (ii) land ownership; (iii) land occupation.	+ Wollongong Recycling (NSW) Pty Ltd wrote to DPI 29/03/18 providing this advice.	+ Letter issued by Bingo Industries 29 March 2018	Yes

Department of Primary Industries Controlled Activity Approval Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor – Jackson Environment and Planning Pty Ltd	Compliant? (Y/N)
6	<p>The approval holder must comply with the requirements of each of the plans approved by DPI Water and stamped on 24/05/2016 as follows:</p> <ul style="list-style-type: none"> i. Construction Civil Plans, Ref. KF110816, Sheets C300-C320, prepared by KFW, dated April 2016 ii. Landscape Management Plans, Ref. 1442, Sheets LC01-02, prepared by Ochre Landscape Architects, dated 22/04/2016 iii. Vegetation Management Plan (Version 7), prepared by Southern Habitat, dated October 2015 	<p>+ Facility has received final Occupation Certificate on 23/01/18 (Cert. No. 2306) + Site inspection on 12/03/19.</p>	<p>+ Occupation certificate + Site inspection 12/03/19 + Vegetation management report from Southern Habitat dated 29 March 2019</p>	Yes
7	<p>The approval holder must submit for approval, by DPI Water, any amendments to a plan listed in Condition 6 (six) prior to carrying out any works in relation to the approved controlled activity.</p>	+ Noted	+ N/a	Yes
8	<p>The approval holder must clearly mark on the ground, the boundaries of the areas where the controlled activity is to be carried out before the commencement of the controlled activity, and maintain the markings until the works are complete</p>	+ Noted	+ N/a	Yes
11	<p>The approval holder must provide a report on the implementation of the vegetation management plan (VMP) to DPI Water at the completion of the vegetation works at every six (6) months up to the end of the maintenance period that must include:</p> <ul style="list-style-type: none"> (i) A schedule and map showing vegetation species, number and location of initial and any replacement planting and propagation materials, and (ii) The date of planting of vegetation, and (iii) The percentage of groundcover, shrubs. Trees and weeds, and (iv) Any problems that impacted the survival rates of plants including climatic, fire, flooding, and vandalism, and (v) A map of the location of any stages activities 	+ Letter report dated 29 March 2019	+ N/a	Yes

Department of Primary Industries Controlled Activity Approval Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor – Jackson Environment and Planning Pty Ltd	Compliant? (Y/N)
	(vi) Photographs showing the revegetation works during the reporting period.			
14	The approval holder must relocate any unused or excess materials outside the designated riparian corridor	+ Site inspection 12/03/19	+ Site inspection 12/03/19	Yes
15	The approval holder must not leave any material which could obstruct the flow of water or damage river banks on waterfront land at anytime	+ Noted – litter and debris sighted adjacent to the riparian area at time of inspection. + This litter needs to be removed. + This was done on 12 March 2019.	+ Site inspection 12/03/19	Now compliant
16	The approval holder must remove surplus material when operations cease and the controlled activity is completed	+ Noted	+ N/a	Yes
17	The approval holder must establish all drainage control works in accordance with Construction Civil Plans, Ref. KF110816, Sheets C300-C320 prepared by KFW dated April 2016, approved by DPI Water and stamped 24/05/2016	+ Works conducted as per approved plans + Facility has received final Occupation Certificate on 23/01/18 (Cert. No. 2306) as evidence of completion of works as per approved plans	+ Occupation Certificate	Yes
18	The approval holder must direct runoff from the site or from other river or drains of the base of the bank of the river or low flow water level by either a pipe or lined channel in accordance with Construction Civil Plans, Ref. KF110816, Sheets C300-C320 prepared by KFW dated April 2016, approved by DPI Water and stamped 24/05/2016	+ Works conducted as per approved plans + Facility has received final Occupation Certificate on 23/01/18 (Cert. No. 2306) as evidence of completion of works as per approved plans	+ Occupation Certificate	Yes

Department of Primary Industries Controlled Activity Approval Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor – Jackson Environment and Planning Pty Ltd	Compliant? (Y/N)
19	The approval holder must construct stormwater outlets so that they point downstream	+ Works conducted as per approved plans + Facility has received final Occupation Certificate on 23/01/18 (Cert. No. 2306) as evidence of completion of works as per approved plans	+ Occupation Certificate	Yes
20	The approval holder must use only biodegradable materials for any erosion control matting in the riparian corridor	+ Works conducted as per approved plans + Facility has received final Occupation Certificate on 23/01/18 (Cert. No. 2306) as evidence of completion of works as per approved plans	+ Occupation Certificate	Yes
22	The approval holder must (i) implement erosion and sediment control measures in accordance with the requires of the Managing Urban Stormwater Manual, Volume 1, Soils and Construction (Landcom, 4th Edition, March 2004) prior to any works commencing at the site, and (ii) maintain the control measures for the duration of the approval to prevent sediment and dirty water entering the waterway	+ Works conducted as per approved plans + Facility has received final Occupation Certificate on 23/01/18 (Cert. No. 2306) as evidence of completion of works as per approved plans	+ Occupation Certificate	Yes
23	The approval holder must only conduct works in the river during periods of low flow	+ Noted as per approved Construction Environment Management Plan	+ Construction Environment Management Plan	Yes
24	The approval holder must revegetate all areas identified in the approved Vegetation Management Plan (Version 7), prepared by Southern Habitat, dated October 2015, in accordance with Landscape Management Plans, Ref. 1442, Sheets LC01-02, prepared by Ochre Landscape Architects, dated 22/04/2016,	+ Works conducted as per approved plans + Facility has received final Occupation Certificate on	+ Occupation Certificate	Yes



Department of Primary Industries Controlled Activity Approval Condition	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor – Jackson Environment and Planning Pty Ltd	Compliant? (Y/N)
	stamped by DPI Water on 24/05/2016. The approval holder must monitor and maintain revegetation works for a period of 2 years in accordance with the approved vegetation management plan.	23/01/18 (Cert. No. 2306) as evidence of completion of works as per approved plans		

A1.4: Pollution Incident Response Management Plan

Pollution Incident Response Management Plan Chapter	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor – Jackson Environment and Planning Pty Ltd	Compliant? (Y/N)
3.1.1	<p>Leachate Collection System all leachate generated from the indoor composting activities is collected and stored in leachate tanks, which will be pumped out and disposed of to sewer as required or reused as a moisture source for the composting operations.</p>	+ Composting not currently done on site	+ Site inspection 12/03/19	Yes
3.2	<p>Management of material to site Pre-emptive measures that are in place to prevent a pollution incident as a result of unscheduled or non-permissible material being deposited on site are:</p> <ul style="list-style-type: none"> • signage to indicate the types of waste allowed and those prohibited; • entry via the weighbridge; • customer declaration of waste; • incoming waste is screened and classified at the weighbridge and CCTV is available to visually inspect loads within trucks; • screening and checking waste at tipping and processing areas; • recording of all information and archived for at least four years; • special waste to be immediately notified to the plant operator; and • regular training of staff supervising tipping and screening of waste in waste classification procedures. <p>If a material is to be delivered under a resource recovery exemption, the material is required to comply with the conditions of a current general exemption or a specific exemption designated for this material. All resource recovery exemptions are made under clauses 51 and 51A of the Protection of the Environment Operations (Waste) Regulation 2005.</p>	+ Site inspection on 12/03/19 and checking of induction procedures confirmed compliance with these requirements.	+ Site inspection 12/03/19	Yes

Pollution Incident Response Management Plan Chapter	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor – Jackson Environment and Planning Pty Ltd	Compliant? (Y/N)
10.2	A review of ongoing training requirements should be conducted on an annual basis and established based on but not limited to: changes in procedures; changes in regulations; changes in equipment; errors or deficiencies in job performance; and errors in data reporting.	+ Bingo Training Needs Register sighted + Daily and weekly toolbox talks occur and these items are addressed	+ Bingo Training Needs Register + Interview with Site Supervisor	Yes
10.3.2	A simulated test of the PIRMP is to be undertaken annually. The planning of this exercise is to be undertaken by the Operations Manager. The goal of this exercise is to provide a situation that is reflective of an incident that may be encountered on site. Safety is paramount for this exercise and no actual hazard should be conducted (such as the lighting of a fire) these will include: <ul style="list-style-type: none"> • Spill; or • Fire. 	+ Interview with Site Supervisor advised this occurs at least once yearly + Date of late test was 7th May 2018	+ Interview with Site Supervisor	Yes
11.1	Manner in which the plan is to be tested and maintained The testing of the plan is going to be based on an annual review of the plan in relation to the simulated testing, incident reporting for the past year and any changes in procedures and processes that occurs on site. The simulation and evacuation drill used to test the practical effectiveness of the plan and define areas of improvement. Reporting of incidents will be used to highlight areas of improvement in the plan. Annual reviews will be used to implement any changes that have occurred in the process of running the site or regulations of operating under this licence	+ Interview with Site Supervisor advised this occurs at least once yearly + Date of late test was 7th May 2018	+ Interview with Site Supervisor	Yes

Pollution Incident Response Management Plan Chapter	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor – Jackson Environment and Planning Pty Ltd	Compliant? (Y/N)
11.2	<p>Review of the Plan The review is to be conducted annually from the date of the first version of the document:</p> <ul style="list-style-type: none"> the document is to be reviewed if there is any significant change in process or operation on the site; the document is to be reviewed where there is a change in the legislation or the requirements of the Environmental Protection Licence; the document is to be reviewed where the testing of the plan identifies a failure or inefficiency; and a review is required to be completed within 30 days of a pollution incident. 	+ PIRMP last updated with the Operational Environmental Management Plan approval from DPE on 26/02/18.	+ Operational Environmental Management Plan	Yes

A1.5: Soil and Water Management Plan

Soil and Water Management Plan	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor – Jackson Environment and Planning Pty Ltd	Compliant? (Y/N)
4.4	<p>Site quarterly groundwater monitoring Groundwater wells to be sampled once every three months upstream and downstream of the development. Quarterly reports to be provided to the Office of Water.</p>	<p>+ Groundwater testing undertaken quarterly consistent with Appendix C - Soil and Water Management Plan as per Operational Environmental Management Plan approved by the Secretary 26/02/18.</p>	<p>+ Operational Environmental Management Plan</p>	<p>Yes</p>
6.1	<p>Inspections and Monitoring Surface water monitoring will be undertaken within the OSD immediately prior to the overflow point and every six months, in accordance with M2 of EPL 20601. Grab samples will be collected from the OSD and samples analysed for pH and total suspended sediment concentrations. Concentrations will be compared to the concentration limits specified for that pollutant under EPL 20601.</p> <p>Groundwater wells upstream and downstream of the development will be sampled and tested on a quarterly basis, with results provided to the Office of Water as required.</p>	<p>+ Soil and Water Management Plan as per the approved Operational Environmental Management Plan (Appendix C).</p>	<p>+ Operational Environmental Management Plan + Interview with Environmental Manager</p>	<p>Yes</p>
6.2	<p>Reporting A quarterly report will be produced by the Environment and Quality Manager to summarise all monitoring results.</p>	<p>+ Consultant appointed to conduct monitoring in accordance with Operational Environmental Management Plan</p>	<p>+ Advice from Environmental Manager</p>	<p>Yes</p>

A1.6: Air Quality Management Plan

Air Quality Management Plan	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor – Jackson Environment and Planning Pty Ltd	Compliant? (Y/N)
6.2	Meteorological Monitoring Daily conditions will be recorded in the site diary and will be used to determine if/when unfavourable weather conditions might impact operational activities.	+ Records made by Site Supervisor in the Daily Site Supervisor Checklist	+ Daily Site Supervisor Checklist	Yes
6.3	Reporting A quarterly report will be produced by the Environment and Quality Manager to summarise all monitoring results.	+ As per Operational Environmental Management Plan approval from DPE on 26/02/18	+ Operational Environmental Management Plan	Yes

A1.7: Operational Environmental Management Plan

Operational Environmental Management Plan Chapter	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor – Jackson Environment and Planning Pty Ltd	Compliant? (Y/N)
8.2	<p>Review and Corrective Action</p> <p>The requirements for the document review are:</p> <ul style="list-style-type: none"> • The review is to be conducted annually from the date of the first version of the document; • The document is to be reviewed if there is any significant change in process or operation on the site; • The document is to be reviewed where there is a change in the legislation or the requirements of the Environmental Protection Licence; • The document is to be reviewed where the testing of the plan identifies a failure or inefficiency; and • A review is required to be completed within 30 days of a pollution incident (as per the Pollution Incident Response Management Plan). 	<p>+ Operational Environmental Management Plan finalized and approved by the Secretary on 26/02/18</p> <p>+ Annual review to be performed on as required following any incident</p>	<p>+ Operational Environmental Management Plan</p>	Yes
10	<p>Complaints and Dispute Resolution</p> <p>All complaints are to be lodged into the Complaints Register. Once a complaint is lodged in the Complaints Register, the relevant personnel (as delegated by the Environment Manager) will provide an initial verbal response to the complainant (immediately if the matter is urgent or otherwise within 24 hour of the complaint) and will investigate or action the complaint if necessary.</p>	<p>+ Complaints register maintained as part of the company's intranet and published online</p> <p>+ System is in place for review and response to all complaints</p>	<p>+ Complaints register</p> <p>+ Interview with Environmental Manager</p>	Yes
15	<p>Training</p> <p>All employees, contractors and utility staff working on site will undergo site induction training (which includes environmental</p>	<p>+ Sighted procedure SOPCOM005 Induction,</p>	<p>+ SOPCOM005 Induction, Competence, Training and Awareness</p>	Yes

Operational Environmental Management Plan Chapter	Consent Condition	Evidence of compliance	Evidence assessed and validated by auditor – Jackson Environment and Planning Pty Ltd	Compliant? (Y/N)
	due diligence training) and environmental training in relation to environmental management. Records will be kept of all personnel undertaking the site induction and training, including the contents of the training, date and name of trainer/s.	Competence, Training and Awareness + All records of training entered into the Bingo Training Needs Register	+ Bingo Training Needs Register	



Kembla Grange Recycling Pty Ltd
Attention: Ros Dent
PO BOX 7
ENFIELD NSW 2136

Name: Jennifer Rowe
Contact: (02) 4247 1851
Email: Jennifer.rowe@planning.nsw.gov.au
File: SSD 5300

Email: Ros.Dent@bingoindustries.com.au

20 August 2019

Dear Ms Dent

**Kembla Grange Resource Recovery Facility SSD 5300
2018 Annual Review**

Reference is made to the Annual Review for the Kembla Grange Resource Recovery Facility for the period 1 January to 31 December 2018, resubmitted to the Department on 2 August 2019 as required under Part C Condition C11 of SSD 5300, as modified (the Consent).

The Department has reviewed the resubmitted Annual Review and considers it to generally satisfy the requirements of the Consent in relation to the Annual Review. Please note that approval of this Annual Review is not endorsement of the compliance status of the project.

The Department notes the late submission of the Annual Review, which was initially submitted on 29 May 2019. The Department takes this opportunity to remind you that you have a responsibility to ensure that the Annual Review is submitted to the Department by the end of March each year or otherwise agreed by the Secretary, as per Part C Condition C11. Any further non compliances of this nature may attract stronger compliance action in accordance with the Departments' Compliance Policy.

Please ensure that future Annual Reviews include a comprehensive review of all monitoring results during the reporting period, including a comparison of the results to the relevant statutory requirements, an analysis of these results against the relevant impact assessment criteria, monitoring results from previous years and predictions in the EIS and/or Supplementary Report, and the identification of trends over the life of the development for all data required to be reported.

Please be advised in relation to the Air Quality and Odour Audit Report, dated 25 May 2018, completed by Consulting Earth Sciences, the Department is currently assessing this report and further correspondence in regard to this Report will be forwarded in due course.

In accordance with Part C Condition C14 of the Consent, it is requested that the 2018 Annual Review is uploaded to the company website by no later than one month after the date of this letter.

If you wish to discuss this further, please contact Jennifer Rowe on the details above.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K. O'Reilly'.

Katrina O'Reilly
Team Leader Compliance
As nominee of the Secretary