

SRC Operations Pty Limited
 Proponents Response to Pre Operational Audit

No.	Condition	Observation	Recommendation	Proponents Response
MP09_0074.				
Schedule 3 Condition 12	<p>Pre-Operational Compliance Audit</p> <p>The Proponent shall commission and pay the full cost of an independent pre- operation compliance audit. The audit must:</p> <ul style="list-style-type: none"> a) be conducted by a suitably qualified, experienced and independent team of experts covering all facets of the Project whose appointment has been endorsed by the Director-General; b) assess compliance with all pre-operation conditions of this approval; c) assess all pre-operation management plans, strategies and programs for consistency with the conclusions and recommendations in the documents listed in condition 2 of Schedule 3 and Schedule 6 and condition 6 of Schedule 3; and d) be submitted to the Department prior to the commencement of operation. 	<p>Site operations commenced prior to the submission of this report to the DPIE.</p>	<p>No recommendations.</p>	<p>This Audit</p>
Schedule 3 Condition 24	<p>Stockpile heights</p> <p>No stockpile of any material shall exceed RL 54 Metres AHD.</p>	<p>A daily checklist has yet to be prepared. Site Management stated that the daily inspection checklist will include a visual check on stockpile heights. Note that the noise bund height is at RL 54m.</p> <p>During the site inspection on 2 July, the clay stockpile exceeded the 54 m height limit. It is noted that the LEMP does not address the procedures to be implemented to ensure compliance with, for example, stockpile height restrictions. The Auditor understands</p>	<p>Provide clear written instructions to earthworks operators and supervisors that no stockpile on site is to exceed the height limit of 54m.</p> <p>Review the LEMP to ensure that all relevant compliance requirements, including stockpile height restrictions are documented, and that the</p>	<p>Clay stockpile height is and remains below limit.</p> <p>Max AHD noted on page 6 and 38 of the LEMP.</p> <p>Stockpile related checks in supervisor daily checklists at the time of the audit – specific note in relation to limit added</p> <p>Compliant</p>


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		<p>that the LEMP will be a key operational resource in this regard. Please refer to the recommendations.</p>	<p>processes and procedures to ensure compliance are fully documented. Refer also to recommendation for Schedule 3 Condition 22.</p>	
<p>Schedule 4 Condition 16</p>	<p>Air Quality and Greenhouse Gas Management Plan The Proponent shall prepare and implement an Air Quality and Greenhouse Gas Management Plan. This plan must:</p> <ul style="list-style-type: none"> a) be prepared in consultation with EPA by a suitably qualified and experienced expert whose appointment has been endorsed by the Director-General; b) be approved by the Director-General prior to commencement of any work; c) describe in detail the measures that would be implemented to manage the air quality and greenhouse gas impacts of the Project to ensure compliance with this approval and other relevant statutory controls; d) include a protocol for the observations and recording of site dust levels on a daily basis. instances of visible dust must be noted in a log along with date, time, cause and response/remedy; e) include a monitoring program for real-time air quality impacts of the project; f) identify the number and location of continuous monitoring points for fine particulates (PM10); g) include development and identification of PMIs concentration trigger levels at which: <ul style="list-style-type: none"> j) dust management actions shall be taken, and 	<p>The EPA was provided an opportunity comment on the Plan but has elected to provide no comments.</p> <p>Correspondence from DPIE confirming the approval of Todoroski Air Services has not been provided to the Auditor.</p>	<p>Obtain (and keep on file) a copy of the letter of approval from DPIE for the appointment of Todoroski Air Services for the preparation of the Air Quality and Greenhouse Gas Management Plan.</p>	<p>Compliant – Note DPE letter dated 14/11/2017 approving Todoroski Air Sciences</p>

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	<p>specification of the relevant actions; and</p> <p>ii) when work at the site shall cease;</p> <p>h) include a program for monitoring subsurface gas, surface gas emission, and gas accumulation in general accordance with the guidance in sections 15-18 of Appendix A of the Environmental Guidelines for Solid Waste Landfills EPA, 1996;</p> <p>i) include a protocol to remedy any-non-compliances</p>			
<p>Schedule 4 Condition 20</p>	<p>Pre-Construction Obligation covered in Pre-Construction Compliance Audit</p> <p>The Proponent shall prepare and implement a Soil, Water and Leachate Management Plan</p>	<p>Site Inspection from 27 June 2019 (Surface and Groundwater management specialist auditor):</p> <ul style="list-style-type: none"> • The as-built Surface Water Control Plan is required yet is currently incomplete as drainage works are incomplete. • Status of main dams: <ul style="list-style-type: none"> ○ Dam 1 – complete ○ Dam 2 – complete and operating as high efficiency basin with flocculation ○ Dam 3 – incomplete ○ Dam 4 – incomplete ○ Dam 5 – incomplete (under construction) ○ Dam 6 – incomplete (under construction) • Sediment dams do not have sediment / water level markers and are therefore incomplete. 	<p>Prior to commencement of landfill operations, the installation and commissioning of the leachate management system should be completed.</p>	<p>Site drainage works completed.</p> <p>All dam constructed and operational</p> <p>Leachate system installed prior to commencement of landfilling activities.</p> <p>Reference document: <i>SRC Operations Pty Ltd Patons Lane Resource Recovery Centre Construction Quality Assurance Report Cell 1A-1 and Initial Leachate Pond July 2019</i></p>

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		<ul style="list-style-type: none"> • Many high stockpile batters remain unstable (poor vegetation cover) and are eroding (sheet and rill erosion). This is contrary to the intent of the erosion and sediment controls outlined in the SWLMP, ie <ul style="list-style-type: none"> ○ No sediment fence in place downslope of stockpiles. ○ Some permanent batters have not successfully stabilised and require further rehabilitation. • No baseline or progressive erosion and sediment control plans were available to the auditor. Site inspections are conducted sporadically. The results of inspections are not recorded, ie no Weekly Inspection Checklist, no Daily Diary. This is required by the SWLMP. <p>Key elements of the leachate collection and transfer system that were still under construction at the time of last inspection, and need to be verified prior to commencement of operations:</p> <ul style="list-style-type: none"> • Leachate barrier and collection system comprising multiple layers and geofabrics, with leachate draining via a leachate drainage aggregate layer and leachate pipes. • Level sensors and visual indicators included in Cell 1 to monitor leachate 		 <p>Area was drought affected at the time of the audit. Landscaping, stabilisation and vegetation maintenance works completed were also drought affected. Seed was purchased and placed in storage pending more favourable conditions. The associated management plans are currently being reviewed and updated.</p> <p>Site supervisor checks are completed and recorded</p>

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		<p>levels.</p> <ul style="list-style-type: none"> • Leachate riser to extract leachate and maintain required freeboards within the collection system • Leachate pumped via pipeline to leachate evaporation pond (11 ML). Pond constructed with base layers to prevent infiltration (to be signed off by Geotech / designer) • Leachate pipeline to include pressure controls (to detect rupture). • Flow meters and level sensors to be installed in leachate system, to continually monitor leachate flows, levels and volumes within the landfill cells, transfer pipework and evaporation pond. • Washdown water from within the C&I waste stockpile building to be separated and directed to leachate system • Should the freeboard within evaporation pond be exceeded, leachate transfer to be halted (via sensors). 		
<p>Schedule 4 Condition 22</p>	<p>Noise Compliance Monitoring</p> <p>The Proponent shall submit a noise compliance assessment to the Director-General three months after the commencement of site establishment. The assessment shall be prepared by a suitably qualified and experienced acoustic consultant and assess compliance with noise limits in Table 7 (Condition 21) for the first</p>	<p>Wilkinson Murray is recognised as one of the leading noise and acoustic consultants operating in NSW and is suitably qualified and experienced.</p> <p>The Wilkinson Murray prepared Patons Lane RCC Noise &Air Quality</p>	<p>Ensure that all future noise monitoring occurs in compliance with the Project Approval.</p>	<p>Monitoring is being conducted in accordance with the consent</p>

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	<p>three months of work.</p> <p><i>Table 7 - Noise impact assessment criteria dB(A)</i></p> <table border="1" data-bbox="344 308 936 775"> <thead> <tr> <th data-bbox="344 308 562 395">Receiver</th> <th data-bbox="562 308 757 395">Day Site Establishment Limit <i>L_{Aeq(15 minute)} dB(A)</i></th> <th data-bbox="757 308 936 395">Day Operation Limit <i>L_{Aeq(15 minute)} dB(A)</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="344 395 562 443">11 Cabernet Circuit</td> <td data-bbox="562 395 757 443">43</td> <td data-bbox="757 395 936 443">39</td> </tr> <tr> <td data-bbox="344 443 562 491">3 Chablis Place</td> <td data-bbox="562 443 757 491">41</td> <td data-bbox="757 443 936 491">38</td> </tr> <tr> <td data-bbox="344 491 562 579">Newham Residence "Roughwood Park", Luddenham Road, Orchard Hills</td> <td data-bbox="562 491 757 579">39</td> <td data-bbox="757 491 936 579">39</td> </tr> <tr> <td data-bbox="344 579 562 667">Bates Residence "Glenholme Farm" Luddenham Rd, Orchard Hills</td> <td data-bbox="562 579 757 667"></td> <td data-bbox="757 579 936 667"></td> </tr> <tr> <td data-bbox="344 667 562 715">210 Luddenham Road</td> <td data-bbox="562 667 757 715">35</td> <td data-bbox="757 667 936 715">38</td> </tr> <tr> <td data-bbox="344 715 562 775">Residence & Hall at the Croatian Cultural Association</td> <td data-bbox="562 715 757 775">37</td> <td data-bbox="757 715 936 775">39</td> </tr> </tbody> </table>	Receiver	Day Site Establishment Limit <i>L_{Aeq(15 minute)} dB(A)</i>	Day Operation Limit <i>L_{Aeq(15 minute)} dB(A)</i>	11 Cabernet Circuit	43	39	3 Chablis Place	41	38	Newham Residence "Roughwood Park", Luddenham Road, Orchard Hills	39	39	Bates Residence "Glenholme Farm" Luddenham Rd, Orchard Hills			210 Luddenham Road	35	38	Residence & Hall at the Croatian Cultural Association	37	39	<p>Monitoring Report 1 July to 31 July 2018 covers only the last month of the first three months following site establishment.</p>		
Receiver	Day Site Establishment Limit <i>L_{Aeq(15 minute)} dB(A)</i>	Day Operation Limit <i>L_{Aeq(15 minute)} dB(A)</i>																							
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<p>Schedule 4 Condition 35</p>	<p>Road Upgrades</p> <p>Prior to the commencement of operation, the Proponent must:</p> <ul style="list-style-type: none"> a) upgrade Patons Lane in the following manner: <ul style="list-style-type: none"> i) pavement widening and reconstruction of the existing pavement; ii) trafficable pavement width of 6.6m; iii) 1.2m wide sealed shoulders; iv) 3m wide table drains; v) design loading for the full life of the development b) upgrade Luddenham Road in the following manner: <ul style="list-style-type: none"> i) pavement reconstruction from chainage 1.45 to 1.9km south of Mamre Road to accommodate a design traffic loading of 5.31 x '106 Equivalent 	<p>The provision of carparking facilities satisfies the requirements of Schedule 4 Condition 35 e, however no documentation evidencing the satisfaction of the DG for the parking facilities provided on the site was made available to the Auditor.</p> <p>No documentation was provided to the Auditor evidencing the provision of the Contribution of the required funds to Council for the Upgrade of Luddenham Road.</p>	<p>Request formal (written) approval of the parking facilities required by Schedule 4 Condition 35 e from DPIE.</p> <p>Arrange for payment of the contribution to Council for the upgrade of Luddenham Road.</p>	<p>Only a controlled works permit was located.</p> <p>Works were subject to Council approval and had not been completed at the time of the audit.</p> <p>Contribution was paid to Council prior to Council issuing approval for the Luddenham Rd road works.</p> <p>Carparking facilities designed to Australian Standards</p>																					

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	<p>Standard Axles (ESA).</p> <p>c) if the Proponent proposes to use B-Double vehicles for the Project, the Proponent must upgrade the intersection on the corner of Mamre Road and Luddenham Road in consultation with Council and to the satisfaction of the RTA. The intersection upgrade must provide:</p> <p>i) an acceleration lane and an extension to the acceleration lane contained within the painted 'seagull treatment on Mamre Road; and</p> <p>ii) adequate storage and acceleration distance within the acceleration lanes for 'B-double' vehicles;</p> <p>d) provide truck turning warning signs in both directions on Mamre Road to the satisfaction of the RTA; and</p> <p>e) provide adequate car-parking on the site in accordance with Australian Standard 2890.1 Parking Facilities to the satisfaction of the Director-General;</p> <p>f) provide a contribution of \$31,200 to the Council towards Council's upgrade of 1.45km of Luddenham Road, south of Mamre Road.</p>			
<p>Schedule 4 Condition 36</p>	<p>Maintenance of Patons Lane</p> <p>Prior to the commencement of operation, the applicant must enter a Deed of Agreement with Public Domain and City Works at Council in relation to the upkeep of Patons Lane. The agreement is to include management of illegal dumping, litter removal, security, sweeping of Patons Lane, and routine pavement maintenance along Patons Lane.</p>	<p>A Deed of Agreement with Council has been prepared. At the time of the Audit the Deed had not been executed by both Parties.</p>	<p>Request Council execute the Deed of Agreement for maintenance of Patons Lane.</p>	<p>Audit occurred prior to execution of Deed.</p> <p>Deed with Council has been executed by both parties.</p>
<p>Schedule</p>	<p>Transport Code of Conduct</p>	<p>No evidence of compliance with this</p>	<p>Provide Council with the</p>	

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4 Condition 38	a) be prepared in consultation with the RTA and Council, and approved by the Director-General prior to the commencement of operation;	condition was provided to the Auditor.	<p>opportunity to review and comment of the draft Transport Code of Conduct.</p> <p>Provide RMS with the opportunity to review and comment on the draft Transport Code of Conduct.</p> <p>Following receipt of comments from RMS and Council, finalise the Transport Code of Conduct and seek formal approval of the Code of Conduct from the DG.</p>	Transport Code of Conduct finalised.
Schedule 5 Condition 5 (sic)	<p>One year after the commencement of site establishment, and annually from the date of approval thereafter, the Proponent shall submit an Annual Environmental Management Report to review the environmental performance of the Project to the satisfaction of the Director-General. This report must:</p> <ul style="list-style-type: none"> a) describe the operations that were carried out in the past year; b) analyse the monitoring results and complaints records of the Project over the past year, which includes a comparison of these results against the: <ul style="list-style-type: none"> i) relevant statutory requirements, limits or performance measures/criteria; ii) monitoring results of previous years; and iii) relevant predictions in the EA; 	No AEMRs have been prepared and submitted to DPIE.	Prepare an Annual Environmental Report in compliance with Schedule 5 Condition 5 for the last reporting period and issue to DPIE.	<p>Arcadis was appointed to complete the post site establishment Annual Environmental Management Review.</p> <p>Arcadis has been appointed to complete the Annual Environmental Management Review</p>

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	<p>c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>d) identify any trends in the monitoring data over the life of the Project; and</p> <p>e) describe what measures will be implemented over the next year to improve the environmental performance of the project.</p>			
<p>Schedule 5 Condition 10</p>	<p>Access to Information</p> <p>From the commencement of site establishment the Proponent shall make the following information freely available on a publicly accessible website as it is progressively required under the approval:</p> <p>a) all current statutory approvals, including this approval;</p> <p>b) plans and programs required under this approval;</p> <p>c) technical analysis/reports of monitoring results, which have been reported in accordance with the various plans and programs approved under the conditions of this approval;</p> <p>d) a complaints register, which is to be updated on a monthly basis;</p> <p>e) a copy of any Annual Environmental Management Report (over the last 5 years);</p> <p>f) a copy of any independent Environmental Audit and the Proponent's response to the recommendations;</p> <p>g) real time monitoring data (noise and air quality); and</p> <p>h) any other material as required by the Director-</p>	<p>The Project Approval is provided on the Patons Lane website, however only one of the two required Environment Protection Licences are provided.</p> <p>The Plans and Programs page on the web site does not contain all of the Plans currently required by the Approval.</p> <p>Technical reports page is accessible and contains a number of reports. All of the required environmental monitoring reports have not been uploaded on to the website.</p> <p>A complaints register has not been provided on the web-site.</p> <p>The first AEMR is now due and is currently being prepared.</p> <p>The website provides access to real-time environmental monitoring.</p>	<p>Upload EPL 21259 to the website</p> <p>Upload the following plans (following finalisation of the plans and approval by DPIE:</p> <ul style="list-style-type: none"> ○ Waste and Resource Recovery Monitoring Program ○ Asbestos and Contamination Management Plan ○ Litter Management Plan ○ Operation Noise Management Plan ○ Traffic Noise Management 	<p>Addressed – except complaint register.</p> <p>At the time of the audit the second EPL had not been issued by EPA. A second EPL was not required as the initial EPL related t the whole premises and was also varied to reflect activities approved by the Consent.</p> <p>It was operator choice to separate the operations on site into two EPLs. The second EPL was subsequently issued by EPA prior to commencement of operations which was post the audit and has since been uploaded to the website.</p> <p>At the time of the audit the Management plans were in the process of being submitted to DPIE for</p>

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	General.		<p>Plan</p> <ul style="list-style-type: none"> ○ (Site) Rehabilitation Plan ○ Quarry Management Plan ○ Construction Quality Assurance Plan <p>Review the Conditions of Approval and ensure that all reports required under the Approval are uploaded onto the website.</p> <p>Develop a complaints register and provide an extract of that register on the web site.</p> <p>Ensure that the AEMR is uploaded to the Website following submission to DPIE.</p> <p>Upload the Pre-Site Establishment Compliance Report and the Proponents response</p>	<p>approval. Approval for all plans has been granted subsequent to the audit and the approved plans have been uploaded to the website.</p> <p>A complaints register has been developed and uploaded to the website</p> <p>Annual Environmental Management Reports and other required documents will be uploaded to the website as they are finalised</p>

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			to the recommendations of that report	
Schedule 7 Condition C	<p>Minimum design requirements for Cell liners</p> <p>a) The clay basal liner within each cell must:</p> <p>i. Extend up the side of the quarry wall for at least 2m to provide for capture of leachate and prevent leakage at the join of the HDPE side liner and the clay base liner.</p> <p>ii. Achieve an infiltration rate equivalent to or less than 90cm of compacted clay with a maximum permeability of 1×10^{-9} m/sec.</p> <p>iii. The extension of the clay liner up the side of the quarry wall shall be of equivalent thickness (when measured perpendicular to the liner surface) and permeability as the basal liner.</p> <p>b) A groundwater depressurisation system (as described in Appendices of the (Revised) Overview Report for the Further Modified Project Report (ExZin Appeal No 10928 of 2010), accompanying the Further Modified Preferred Project Report (ExZ in Appeal No 10928 of 2010) must be installed between the landfill cell liner and the natural geology where the cells are below the ground level. The design for the groundwater depressurisation system must be included in the design for the landfill cells and accompany the application for the EPL.</p>	<p>The Auditor understands that all elements of the groundwater protection system have been installed, however the Construction Quality Assurance Report provided did not verify the installation of the groundwater pressurisation system.</p> <p>The Auditor could not verify compliance with this Condition.</p>	Provide documented evidence that the groundwater depressurisation system has been installed.	Aspects of the ground water depressurisation system would have been visible at the audit site inspection
Schedule 7 Condition H	<p>Surface water and groundwater management</p> <p>a) A minimum total of seven groundwater observation bores will be drilled around the perimeter of the facility as part of the site establishment works. Bore construction will be</p>	The Soil Water and Leachate Management Plan does not identify the location of the wet weather discharge points, parameters to be measured or the frequency of monitoring detailed in	Update the Soil, Water and Leachate Management Plan to cover the reuse of stormwater for irrigation of	Spillway and outlet structures are noted in the plans appended to the SWLMP The SWLMP will be

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	<p>in accordance with EPA requirements and sampling will be carried out in accordance with monitoring plan in the LEMP and in accordance with the EPLI</p> <p>b) Prior to commencement of waste emplacement, the groundwater will be sampled and monitored by an EPA approved analyte list using the bores to establish background conditions in surface water and groundwater.</p> <p>c) Groundwater will be sampled and monitored throughout the operation of the facility and post closure for as long as deemed necessary by the EPA and at intervals specified by the EPA.</p> <p>d) Stormwater runoff from intermediate cover areas (minimum 300mm thick) and bunded areas of the cell floor will be isolated from contact with the waste and will be collected and pumped from the landfill area and treated as stormwater in the stormwater management system.</p> <p>e) Surface water runoff and leachate must be kept separate at all times, to ensure this occurs the applicant is to ensure the control and mitigation measures referred to in the surface water report of GSS are to be incorporated into the design and implemented during each stage/phase cell of the development, including but not limited to:</p> <p>a) Construct sedimentation dams for sediment-laden runoff.</p> <p>b) The surface water management system is to include measures to treat run off to where required to reach acceptable discharge under the EPL, according to guidelines from Managing Urban Stormwater - Soils and Construction</p>	<p>EPL 20814.</p>	<p>rehabilitation areas.</p> <p>Update the Soil, Water and Leachate Management Plan to include the location of the wet weather discharge points, parameters to be measured or the frequency of monitoring detailed in EPL 20814.</p>	<p>updated following completion of audits, annual review and approval of modifications to implement water recycling and waste water treatment</p>

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	<p>Manual (DECC 2004) and EPA requirements.</p> <p>c) Re-use water from sedimentation dams for dust suppression and revegetation</p> <p>d) Water discharged from site via a licensed discharge point where its quality is monitored. Temporary erosion and sediment control measures to be installed construction.</p> <p>f) Clean runoff is must be directed away from disturbed areas.</p> <p>g) Maintenance of sediment control structures.</p> <p>h) Contingency procedures for breaches and cross-contamination stormwater and leachate.</p> <p>f) Only stormwater is to be reused onsite for dust suppression and revegetation, with excess stormwater managed and treated where required for monitored licensed discharge.</p> <p>g) The Stormwater Soil, Water and Leachate Management Plan must identify the location of licensed discharge points for stormwater, and monitoring parameters and frequency of monitoring.</p> <p>h) The stormwater system must be designed in accordance with the Managing Urban Stormwater - Soils and Construction Manual (the "Blue Book") - DECC, 2004</p> <p>i) Monitoring requirements for surface water and groundwater (parameters and frequency) must be included in the Plan.</p>			
Schedule 7 Condition 1	<p>Monitoring</p> <p>1. All groundwater piezometers must be installed around the site as per Annexure 5 in Appendix 1 contained the Cell Design and Groundwater Assessment (Aquaterra 2A1a). These</p>	<p>The Auditor sighted water quality field measurement records from Catalyst Environmental Solutions. However, no records demonstrating commission for Catalyst (or an alternative independent</p>	<p>Update the Soil, Water and Leachate Management Plan to include the groundwater monitoring requirements</p>	<p>GHD has been commissioned to complete groundwater monitoring. The landfill was not operational at the time of</p>

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	<p>piezometers must be installed and appropriately sampled during site establishment, and before any waste is received at the site, to determine background groundwater characteristics (groundwater quality and groundwater flow conditions).</p> <p>2. The piezometers must be sampled during the detailed engineering design and site establishment phases to identify and confirm background groundwater characteristics and clarify the connectivity between groundwater and the creek.</p> <p>3. The operator must engage an independent party (or parties) to monitor the following during the life of the project in accordance with the LEMP and the EPL:</p> <p>a. Groundwater levels and quality;</p> <p>b. Leachate levels in cells and quality;</p> <p>c. Leachate levels in dams and quality;</p> <p>d. Surface water quality at offsite discharge point;</p> <p>e. Cover and capping operations on waste cells;</p> <p>f. Background groundwater characteristics; and</p> <p>g. Clarify the connectivity between the groundwater and Blaxland Creek.</p> <p>4. Leachate modelling must be validated through independent assessment and monitoring of leachate flows, levels and volumes in leachate storage ponds.</p> <p>5. If validation assessment of the leachate model indicates excess leachate storage is required</p>	<p>Consultant) was available that demonstrated that a consultant or consultants had been commissioned to undertake the required monitoring.</p> <p>The auditor could not verify compliance with this Condition.</p>	<p>specified in EPL 20814.</p> <p>Formally commission a consultant (or consultants) to undertake the following monitoring and reporting:</p> <p>a. Groundwater levels and quality;</p> <p>b. Leachate levels in cells and quality;</p> <p>c. Leachate levels in dams and quality;</p> <p>d. Surface water quality at offsite discharge point;</p> <p>e. Cover and capping operations on waste cells;</p> <p>f. Background groundwater characteristics; and</p> <p>g. Clarify the connectivity between the groundwater and Blaxland Creek.</p>	<p>the audit</p>

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	<p>then potential contingency arrangements must be developed and implemented to the satisfaction of the EPA. If directed by the Yepa, further waste receipt must be suspended until the EPA is satisfied with the arrangements.</p> <p>6. Results of leachate validation assessment compared to the model provisions must be provided to the EPA upon request.</p>			
Schedule 9	<p>Management Methods, Procedures and Specific Noise Mitigation Measures</p> <p>a) The waste recycling and re-processing facility must be sited on the project site at the furthest distance from residences, as shown in Appendix A to the Updated Consolidated Acoustic Report;</p> <p>b) Earth mounding must be used on the northern, eastern and southern boundaries of the site, as shown in Appendix A to the Updated Consolidated Acoustic Report, during the periods when operations within the site require them;</p> <p>c) Earth mounds must be provided within the site at the Central and Southern locations at specified times, as shown in Appendix A to the Updated Consolidated Acoustic Report;</p> <p>d) Acoustic mounding must be used to enclose the waste recycling and re-processing cell;</p> <p>e) The fixed recycling and re-processing equipment must be housed within acoustic enclosures;</p> <p>f) Construction Phase Condition</p> <p>g) Acoustic treatment must be applied to selected mobile earthmoving and other equipment to be used on site, to achieve the specified noise</p>	<p>Noise testing of the plant working on top of the stockpiles had not been undertaken by Bingo. This condition could not be verified.</p> <p>A summary noise monitoring report has not been issued to Council or the EPA.</p>	<p>1) Undertake noise monitoring of all plant and equipment that may be located on top of the stockpiles. Maintain those records as evidence of compliance.</p> <p>2) Ensure that an annual noise monitoring report is issued to Council and the EPA.</p>	<p>Temporarily suspended due to limited operation.</p> <p>WM asked to address on our behalf.</p>

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	<p>criteria shown in Table 5.2 in the Updated Consolidated Acoustic Report;</p> <p>h) Acoustic screening must be used for clay/shale loading operations, specifically in Cell 3, through strategic placement of 4m-high barriers in an east-west orientation across the active stockpile area, so as to always acoustically screen earthmoving equipment during loading operations;</p> <p>i) No operational equipment having a sound power level greater than 106 dBA (unshielded) or 111 dBA (shielded) will be located on top of stockpiles;</p> <p>j) No bobcats, front end loaders or bulldozers will be located on top of the stockpiles around the processing plant, other than during construction stage.</p> <p>k) The following procedure for determining and verifying the location of "moveable"/"temporary fixed" barriers, and of any work conducted behind them, should be implemented:</p> <p>l) marking off an area behind the new barriers at which the RL of the ground is no more than 1m higher than that at the base of the barrier, (or lower at greater distances behind), in general accordance with Appendix A to the Updated Consolidated Acoustic Report, and within which there is no line of sight to any residence to the side of the barrier. The permitted work area must be marked off with tape, fibreglass poles or similar, to represent the area within which equipment must operate behind the barrier; and</p> <p>ii) an acoustic engineer must attend the site to formally verify the location of the barrier and the</p>			

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	<p>new working area.</p> <p>l) No work will be conducted outside the site's perimeter bunds or the temporary fixed barriers during the above process, except that work required to actually move the barriers.</p> <p>m) Earth mounds are to be used to shield equipment working close to the top of the final landform to control noise from this equipment.</p> <p>n) Site Closure Condition</p> <p>o) Site Closure Condition</p> <p>p) The Proponent shall undertake real-time continuous noise monitoring, and separately, an ongoing attended noise monitoring program, for the operational life of the project, to be documented in Operation Noise Management Plan (identified at Condition 27).</p> <p>q) The Proponent shall submit a summary report of the real time monitoring results to Council and the OEH, which documents all non-compliances with Table 7, and any rectification works, or modification of work practices undertaken to obtain compliance:</p> <p>i) at 3 month intervals during Site Establishment and the first two years of operation; and</p> <p>ii) thereafter, on a six monthly basis.</p>			

Table *Error! No text of specified style in document.-1* Other Recommendations

No.	Condition	Observation	Recommendation	Status and comments for response
Schedule 3	Waste Receipt The Proponent shall not exceed the waste receipt	Specific, detailed waste receipt processes have been developed. A	It is recommended that the LEMP be reviewed to ensure	Completed

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No.	Condition	Observation	Recommendation	Status and comments for response
Condition 22	and waste emplacement Volumes (Table 1) of: a) Maximum total waste emplacement: 4,300,000 tonnes b) Maximum Annual Receipt: 450,000 tonnes c) Maximum on-site waste emplacement: 205,000 tonnes	<p>permanent weighbridge has been installed at the site.</p> <p>In summary: Wastes received at the facility will be weighed on arrival at the site. All recovered materials leaving the site will be weighed prior to dispatch from the site.</p> <p>Waste records will be kept on the Weighbridge Database.</p> <p>It is noted that the LEMP does not address the procedures to be implemented to ensure compliance with, for example, waste volume limits. The Auditor understands that the LEMP will be a key operational resource in this regards. Please refer to the recommendations.</p>	<p>that all relevant compliance requirements, including waste volume limits are documented, and that the processes and procedures to ensure compliance are fully documented. Refer also to recommendation for Schedule 3 Condition 24.</p>	
Schedule 3 Condition 25	<p>Traffic Generation</p> <p>Despite any other limit in the approval, the Proponent shall ensure that heavy vehicle traffic generation for the project does not exceed the maximum specified in Table 3. (250 heavy vehicle movements per day).</p>	<p>The number of heavy vehicles arriving each day will be monitored at the weighbridge. Management stated that the site would not accept more than 125 incoming truck movement in any one day.</p> <p>No training or procedural documentation was available to communicate these requirement to weighbridge staff or site supervisors or management.</p>	<p>Prepare a procedure and training materials to communicate the truck movement limitations, monitoring, reporting and actions required to ensure compliance with this Condition.</p>	<p>Code of conduct developed</p>

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No.	Condition	Observation	Recommendation	Status and comments for response
Schedule 4 Condition 1	<p>Restriction of Waste</p> <p>The Proponent shall only receive and/or emplace waste on-site that is classified as general solid (non-putrescible waste) unless otherwise authorised for receipt and/or emplacement by an EPL.</p>	<p>At the time of the Audit, the EPL 20814 prohibited the importation of waste onto the site. However, EPL 21259 lists the waste categories that may be imported onto the site.</p> <p>During multiple inspections of the site, the Auditor found no evidence that waste materials were being imported onto the site. Cell 1A was under construction and contained no waste materials.</p> <p>The waste receipt systems in place (and demonstrated to the Auditor) include appropriate procedures for the receipt, inspection and record keeping for wastes delivered to the site.</p> <p>Current version of the management plans do not cover the requirements of EPL 21259.</p>	Update the LEMP to include the specific requirements of EPL 21259.	Completed
Schedule 4 Condition 2	<p>Restriction of Waste</p> <p>No restricted solid waste shall be permitted to enter the site</p>	<p>At the time of the Audit, the EPL 20814 prohibited the importation of waste onto the site. However, EPL 21259 lists the waste categories that may be imported onto the site.</p> <p>During multiple inspections of the site, the Auditor found no evidence that waste materials were being imported onto the site. Cell 1A was under</p>	Include, in the WRRMP a clear description of what "Restricted Wastes" are not permitted to be accepted at the site.	Noted

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No.	Condition	Observation	Recommendation	Status and comments for response
		<p>construction and contained no waste materials.</p> <p>The waste receipt systems in place (and demonstrated to the Auditor) include appropriate procedures for the receipt, inspection and record keeping for wastes delivered to the site.</p> <p>Current version of the management plans do not cover the requirements of EPL 21259.</p>		
Schedule 4 Condition 3	<p>Restriction of Waste</p> <p>Stockpiles of construction and demolition waste shall only be stored within the Material Recycling Facility Warehouse.</p>	<p>No wastes have been received at the facility to date. The waste management procedures contained in the Operations Management Plan state that C&D wastes will be stockpiled outside of the Resource Recovery Centre.</p>	<p>Update the LEMP and WRRMP to clearly describe the restrictions on waste stockpiling contained the Approval and clearly identify the location of all waste and related stockpiles.</p>	Noted
Schedule 4 Condition 6	<p>Waste Outputs</p> <p>Except for the following, the Proponent shall dispose of all outputs produced from the Material Recycling Facility warehouse to the landfill on-site:</p> <ul style="list-style-type: none"> a) recyclables extracted and exported off-site for resource recovery purposes; b) waste not authorised by an EPL extracted from the input waste stream, which shall be exported for lawful disposal off-site; and c) output waste derived materials approved for use under the POEO Act and 	<p>No wastes have been processed at the site and therefore no residual wastes have been disposed of in the landfill.</p> <p>The LEMP does not described what wastes can and cannot be disposed in the landfill.</p>	<p>Revise the LEMP to include details of wastes that may be disposed of in the landfill.</p>	<p>LEMP states the facility can accept GSW – non-putrescible</p>

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No.	Condition	Observation	Recommendation	Status and comments for response
	Regulations.			
Schedule 4 Condition 24	<p>Operating hours for heavy vehicles</p> <p>Notwithstanding the provisions of Table 8 (Condition 23) the proponent shall ensure that:</p> <p>a) heavy vehicles travelling to or from the Site shall not arrive at the site prior to 7am or leave the site after 5pm on a weekday and shall not arrive at the site prior to 1 am or leave the site after 2pm on a Saturday, or any time on a Sunday or public Holiday; and</p> <p>b) heavy vehicles travelling to or from the Site do not travel upon Luddenham Road south of its junction with Patons Lane</p>	The Transport Code of Conduct contains the required information that is required to be communicated to heavy vehicle operators.	See recommendations for Schedule 4 Conditions 38.	Noted
Schedule 4 Condition 28	<p>Traffic Noise Management Plan</p> <p>This plan must be documented in the Transport Code of Conduct.</p>	A Transport Code of Conduct has been prepared.	Refer to Schedule 4 Condition 38.	Noted
Schedule 4 Condition 38	<p>Transport Code of Conduct</p> <p>The Proponent shall prepare and implement a Transport Code of Conduct.</p>	A Transport Code of Conduct has been prepared.	Finalise the Transport Code of Conduct and add a revision number and date to permit proper document quality control.	Completed
Schedule 5 Condition 5	<p>Landfill Environmental Management Plan</p> <p>f) identify the statutory approvals that apply to the Project</p>	The current version of the plan contains the details specified in Schedule 5, Condition 5, Clause f.	Expand Section 3 to include the requirements of the EPLs that apply to the Operation.	Addressed
Schedule 5 Condition 10	<p>Access to Information</p> <p>e) a copy of any Annual Environmental Management Report (over the last 5 years);</p>	The first AMER is now due and is currently being prepared.	Ensure that the AEMR is uploaded to the Website following submission to DPIE.	Noted
Schedule 7	<p>Landfill operational requirements</p> <p>1. In addition to the leachate management</p>	Administrative statement.	To assist Bingo in demonstrating compliance	Noted – site supervisor checklists will be

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No.	Condition	Observation	Recommendation	Status and comments for response
Condition F	system specifications indicated above, the landfill operation must comply with the following requirements to ensure that leachate is minimised, and that leachate is separated from stormwater throughout the operation of the Project unless otherwise approved by the EPA:		with this condition in future audits, it is recommended that verifiable records be maintained concerning landfill operations and in particular waste deposition, spreading, the application of intermediate and daily covers.	implemented
Schedule 7 Condition H	Surface water and groundwater management Only stormwater is to be reused onsite for dust suppression and revegetation, with excess stormwater managed and treated where required for monitored licensed discharge.	This Condition has not been triggered, however the requirements of this Condition have been covered in the Soil, Water and Leachate Management Plan.	Update the Soil, Water and Leachate Management Plan to cover the reuse of stormwater for irrigation of rehabilitation areas.	Addressed
Schedule 7 Condition I	Monitoring 1. All groundwater piezometers must be installed around the site as per Annexure 5 in Appendix 1 contained the Cell Design and Groundwater Assessment (Aquaterra 2A1a). These piezometers must be installed and appropriately sampled during site establishment, and before any waste is received at the site, to determine background groundwater characteristics (groundwater quality and groundwater flow conditions).	While this condition has been satisfied in that the monitoring locations and test parameter have been specified, the monitoring does not meet the requirements of the EPL.	Update the Soil, Water and Leachate Management Plan to include the groundwater monitoring requirements specified in EPL 20814.	Addressed
Schedule 9	Management Methods, Procedures and Specific Noise Mitigation Measures r) The ongoing attended noise monitoring program must include environmental noise monitoring of the Project site's total noise emissions including fixed plant and mobile earthmoving equipment auditing and identify whether fixed plant earthmoving equipment	The noise monitoring report was observed by the auditor, however did not fully comply with the condition including the requirement to monitor fixed and mobile earth moving plant.	Ensure that future noise monitoring includes fixed and mobile earth moving plant.	Noted

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No.	Condition	Observation	Recommendation	Status and comments for response
	noise levels exceed the sound power levels in Table 5.2 contained in the Updated Consolidated Acoustic Report.			