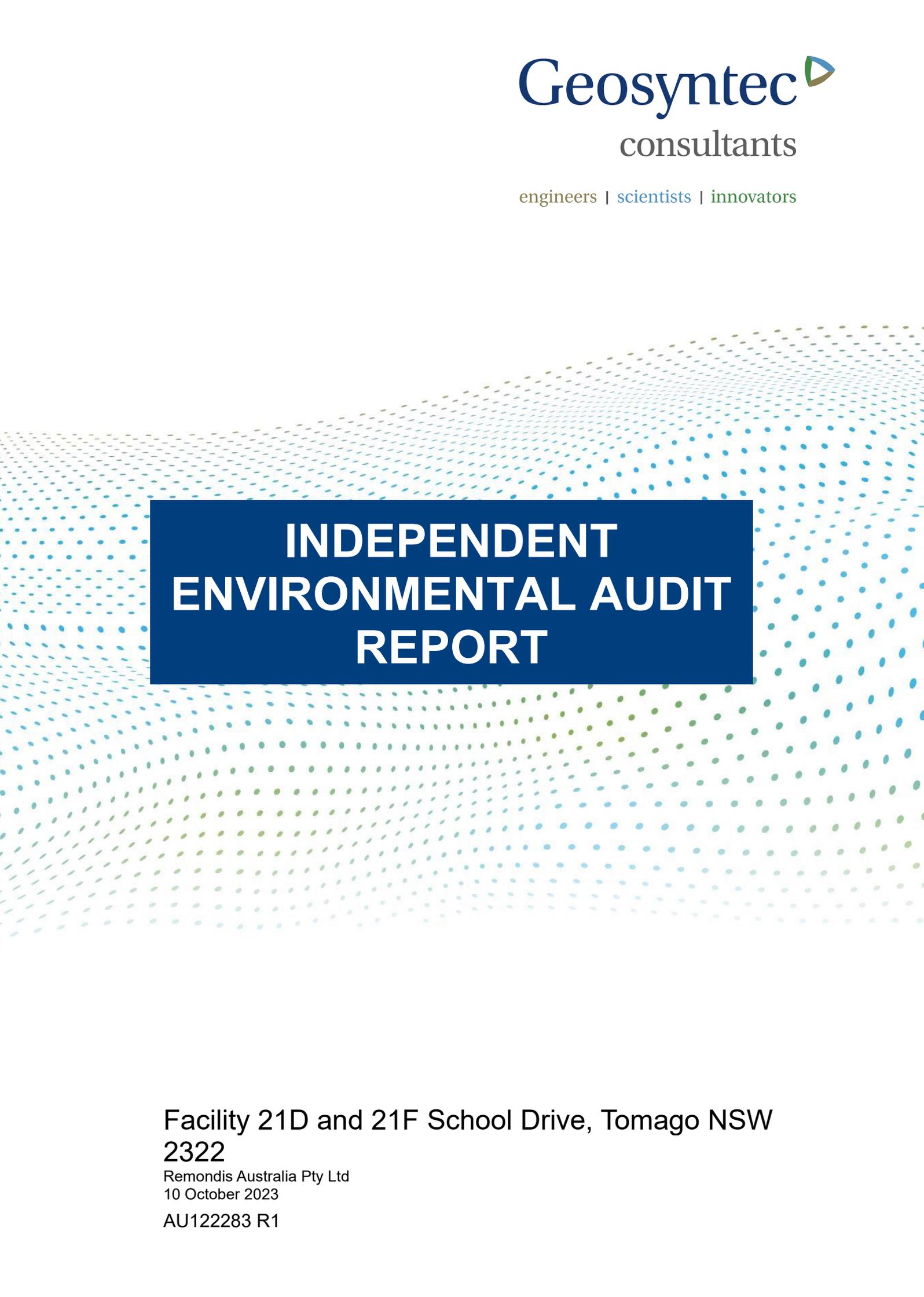


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**INDEPENDENT  
ENVIRONMENTAL AUDIT  
REPORT**

Facility 21D and 21F School Drive, Tomago NSW  
2322

Remondis Australia Pty Ltd  
10 October 2023

AU122283 R1

# Quality Management

## Document Distribution

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Signature	DRAFT	
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This report was prepared in accordance with the scope of services set out in the contract between Geosyntec Consultants Pty Ltd (ABN 23 154 745 525) and the client.

## Executive Summary

Geosyntec Consultants Pty Ltd (Geosyntec) was engaged by Remondis Australia Pty Ltd (Remondis) to conduct an operational Independent Environmental Audit (IEA) project for Tomago Resource Recovery Facility 21D and 21F School Drive, Tomago NSW 2322 ('the site'). The site is listed as Lot 8 and 11 DP 270328 and Part Lot 301 DP 634536<sup>1</sup>. The development is also referred to as Tomago Resource Recovery Facility.

The boundary of the site covered by this IEA is provided in Appendix A and occupies an area of approximately 4 hectares.

This audit is the first IEA of the operational phase for the project. The purpose of the IEA is to provide an independent and objective assessment of the environmental performance and compliance of the operational phase of the approved development at the site.

The overall objective of the Audit is to confirm compliance with Independent Environmental Audit Conditions C16 and C17 of the NSW Department of Planning and Environment (DPE) State Significant Development Approval (SSD 10447) ('SSD Approval') issued 12 October 2021.

The IEA was conducted in accordance with the NSW Government (May 2020) Independent Audit Post Approval Requirements. The site inspection was conducted on 10 July 2023.

A total of 129 items were assessed as part of SSD consent conditions. A summary of the findings is provided as follows:

- Number of compliances = 81 items
- Number of non-compliances = 6 items
- Number of non-triggered = 42 items

A total of 134 items were assessed in reviewing the implementation and compliance with Site's operational environmental management plans. A summary of the findings is provided as follows:

- Number of compliances = 99 items
- Number of non-compliances = 0 items
- Number of non-triggered = 35 items

A discussion of IEA findings is presented in this document. The Auditor also provides recommendations on opportunities for improvement.

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<sup>1</sup> This Lot and DP is based on the SSD 10447 conditions of consent.

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## Glossary

Term	Description
Audit	Systematic, independent and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled (ISO 19011:2018). For the purpose of this report, Audit refers to an Independent Environmental Audit in accordance with the NSW Government (May 2020) Independent Audit Post Approval Requirements
Audit criteria	Set of requirements used as a reference against which objective evidence is compared.
Audit evidence	Records, statements of fact or other information which are relevant to the audit criteria and verifiable.
Audit findings	Results of the evaluation of the collected audit evidence against audit criteria.
Audit conclusion	Outcome of an Audit after consideration of the Audit objectives and all audit findings.
Auditee	Organisation being audited.
Audit Program	Audit Schedule and Audit Table as defined in NSW Government (June 2020) prepared by Geosyntec prior to the commencement of the Audit.
Auditor	Person(s) who conduct(s) the Audit, as defined in this report. Lead Auditor and Auditor in Training
Audit Team	One or more persons conducting the Audit, supported if needed by technical experts.
Authorised Reporting Officer	A director, executive, employee or office of the proponent who is authorised by the proponent to submit formal reporting on the proponent's behalf.
Competence	Ability to apply knowledge and skills to achieve intended results.
Compliant	The Auditor has obtained sufficient evidence to demonstrate that the specific item being audited has been satisfied to the objective of the Audit.
CSSI	Critical State Significant Infrastructure
DoEE	The Commonwealth Department of the Environment and Energy administering the EPBC Act, and includes the Minister for the DoEE
DPE	NSW Department of Planning and Environment (previously DPIE)
DPIE	NSW Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
Environmental Representative (ER)	A suitably qualified and experienced person independent of project design and construction personnel employed for the duration of Construction, who will be the principal point of advice in relation to all questions and complaints concerning environmental performance.
EP&A Act	NSW Environmental Planning and Assessment Act 1979
EPBC Act	Commonwealth Environment Protection and Biodiversity Conservation Act 1999
EPL	NSW Environment Protection Licence under the Protection of the Environment Operations Act 1997
Federal CoA	Federal DoEE Condition of Approval
Incident	An occurrence or set of circumstances that causes, or threatens to cause material harm and which may or may not be or cause a non-compliance.
Minister	Minister of DPE or delegate.
NSW CoA	NSW DPE Condition of Approval
Non-compliant	The Auditor has not obtained sufficient evidence to demonstrate that the specific item being audited has been satisfied to the objective of the Audit.
Not triggered	The specific item has not been activated at the time of the Audit and therefore, the Audit was not completed for the item.
Planning Secretary	The Planning secretary under the EP&A Act or nominee.

<b>Term</b>	<b>Description</b>
PoEO Act	NSW Protection of the Environment Operations Act 1997
Post approval document	A document required by conditions of consent, including Environmental Management Plans and Sub-plans.
Predicted impact	Predicted impacts described in the Environmental Impact Assessment documents that comprise the approved project (if available).
Project	As per definition in Section 1
Proponent	The person or entity that is referred to as the proponent in an approval or the applicant in a consent or any other person carrying out any part of the development to which the approval or consent applies.
Risk	Effect of uncertainty.
Site	As per definition in Section 1
State significant projects	Means any of the following in accordance with the EP&A Act: <ul style="list-style-type: none"> <li>• State significant development projects</li> <li>• State significant infrastructure projects, including critical State significant infrastructure projects</li> <li>• Transitional Part 3A projects</li> <li>• Part 4 projects for which the Minister is the consent authority</li> </ul>

# 1 Introduction

Geosyntec Consultants Pty Ltd (Geosyntec) was engaged by Remondis Australia Pty Ltd (Remondis) to conduct an operational Independent Environmental Audit project for Tomago Resource Recovery Facility 21D and 21F School Drive, Tomago NSW 2322 ('the site'). The site is listed as Lot 8 and 11 DP 270328 and Part Lot 301 DP 634536<sup>2</sup>. The development is also referred to as Tomago Resource Recovery Facility.

The boundary of the site covered by this IEA is provided in Appendix A and occupies an area of approximately 4 hectares.

## 1.1 Background

The site use prior to development is not made known to Geosyntec. From the NearMap review the site appear to comprise an industrial site since 2010.

The development comprises a resource recovery facility to process solid and liquid waste from municipal, commercial, industrial and construction sources for reuse and recycling.

## 1.2 Audit Team

The Audit team comprised the following Geosyntec personnel:

**Table 1.1. Audit Team**

Name	Role
Dr Cheryl Halim	Auditor /Auditor Technical Specialist <ul style="list-style-type: none"> <li>• Exemplar Global AU (ISO 19011:2018) (No. 11280933-7383767)</li> <li>• NSW EPA Accredited Site Auditor (under Contaminated Land Management Act) (No. 2201)</li> <li>• BE (Chemical)</li> <li>• PhD (Chemical Engineering)</li> </ul>
Rebeka Hall	Alternate Lead Environmental Auditor <ul style="list-style-type: none"> <li>• Exemplar Global AU (ISO 19011:2018) (No. 7090575-5136510)</li> <li>• NSW EPA Accredited Site Auditor (under Contaminated Land Management Act) (No. 0802)</li> <li>• Certified Environmental Practitioner (General) EIANZ (No. 889)</li> <li>• Certified Environmental Practitioner (Site Contamination Specialist) EIANZ (No. SC40913)</li> <li>• BEnvSci (Hons) (Geology)</li> </ul>
Fiona Wong	Support Auditor <ul style="list-style-type: none"> <li>• B.E. (Hons), Environmental, University of New South Wales</li> <li>• Master of Environmental Management, University of New South Wales</li> </ul>
Dr Cissillia Young	Support Auditor <ul style="list-style-type: none"> <li>• BE (Chemical)</li> <li>• PhD (Chemical Engineering)</li> </ul>

The Audit Team Declaration is provided in Appendix B.

<sup>2</sup> This Lot and DP is based on the SSD 10447 conditions of consent.

Rebeka Hall was approved in DPE letter dated 13 June 2023, however was not involved in this Operational Audit.

### 1.3 Purpose and Objective of Audit

The purpose of the IEA is to provide an independent and objective assessment of the environmental performance and compliance status of the operational phase of the approved development. This audit is the first Operational Audit, completed within one year of the commencement of operation (which commenced on 3 August 2022)<sup>3</sup>.

The overall objective of the Audit is to confirm compliance with Independent Environmental Audit Conditions C16 and C17 of the NSW Department of Planning and Environment (DPE) State Significant Development Approval (SSD 10447) ('SSD Approval') issued 12 October 2021, which state:

	<p>Within one year of the commencement of operation of the development, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must:</p>
C16	<p>a. be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020)</p> <p>b. be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and</p> <p>c. be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary).</p>
	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must:</p>
C17	<p>a. review and respond to each Independent Audit Report prepared under condition C16 of this consent;</p> <p>b. submit the response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations;</p> <p>c. implement the recommendations to the satisfaction of the Planning Secretary; and</p> <p>d. make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before this is done.</p>

This Independent Environment Audit was conducted in accordance with the requirements of the NSW Government (May 2020) Independent Audit Post Approval Requirements (IAPAR).

### 1.4 Audit Scope

#### 1.4.1 Audit Scope (Physical and Temporal Boundaries)

The physical and temporal boundaries of the current IEA are as follows:

- Physical boundary: The site is 40,000m<sup>2</sup> and located within Lot 8 and 11 DP 270328 and Part Lot 301 DP 634536<sup>4</sup>. The boundary of this Audit is shown in the site plan included in Appendix A. The site is currently an operation site. The Audit also included observation of the general surrounding area.

<sup>3</sup> This is the date of Occupation Certificate 2 provided by Remondis, which was stated to be the date of commencement of operation.

<sup>4</sup> This Lot and DP is based on the SSD 10447 conditions of consent.

- Temporal boundary of the audit is for the duration of the operational period since the commencement of the operation (3 August 2022).

#### 1.4.2 Audit Criteria (Audit Works)

The Audit criteria are identified by the conditions for SSD 10447 and the requirements outlined in the NSW Government (May 2020) Independent Audit Post Approval Requirements.

The Audit Table (Appendix F) presents the requirements to evaluate during the Audit including:

- An assessment of compliance with the Conditions of Consent and other relevant approvals and licences, including SSD Approval Conditions
- An assessment of environmental performance of the operational phase, including:
  - Assessment of actual impacts compared to predicted impacts documented in the Environmental Impact Statement (EIS) and Return to Submission (RTS) documents.
  - Assessment of any incidents, non-compliances and complaints that have occurred on the project.
  - Assessment of any feedback received by DPE, other agencies and stakeholders (as appropriate)
  - Assessment of performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the Audit scope.
- A high-level assessment of the adequacy of the Project's operational environmental management plan (OEMP) and sub plans and their implementation.

### 1.5 Audit Period

This Audit comprises the first IEA for the operational phase of the development and covers a review period of 3 August 2022 up to the time of Site Audit (10 July 2023) and the issue of the final report (10 October 2023).

### 1.6 Environmental Representative

Rachael Mulholland from Remondis was the appointed Environmental Representative, who assisted Geosyntec during this Audit process.

Steven Hassett, Elizabeth Leahy, and Phill Walmsley from Remondis also assisted Geosyntec during the Audit process.

## 2 Audit Methodology

### 2.1 Auditor Notification to DPE

The Environmental Audit team was notified and approved by DPE in a letter dated 28 April 2023 and 13 June 2023, respectively. Correspondence is attached in Appendix C.

### 2.2 Site Audit Process

The Audit comprised:

1. Opening meeting
2. Compliance to the Audit Program
3. Review of evidence of consultation with identified stakeholders
4. Closing meeting
5. Issue of Draft Independent Environment Audit report
6. Review of additional information (if any)
7. Finalisation of Independent Environment Audit report

#### 2.2.1 Opening Meeting

The opening meeting was conducted onsite on 10 July 2023. The agenda for the meeting and the record of attendees are provided in Appendix D.

#### 2.2.2 Sources of Information to Assess Compliance to Audit Program

Sources of information reviewed to assess compliance to the audit program included:

- Review of project records, documentation, and reports.
- Interview with key operational personnel (available during site inspection) and post site inspection follow-up.
- Site walkover and inspection for implementation of environmental controls.
- Review of complaints registers for the project.

#### 2.2.3 Closing Meeting

The closing meeting was conducted via email correspondence from Geosyntec, which provided an overview of key findings and timing for the Audit Report. The closing meeting email provided preliminary findings of the Audit.

#### 2.2.4 Issue of Independent Environment Audit Report

The Draft Independent Environmental Audit Report was issued on 9 October 2023.

#### 2.2.5 Finalisation of Independent Environment Audit Report

The IEA report was finalised on 10 October 2023 with no change.

## 2.3 Interviews

Interviews with operation personnel conducted on 10 July 2023. The following personnel were interviewed:

- Rachael Mulholland (Remondis – Environment and Sustainability Advisor, Environmental Representative for this Audit)
- Elizabeth Leahy (Remondis – Project Manager NSW/ACT)
- Phillip Walmsley (Remondis – Operation Manager)
- Steven Hassett (Remondis – Senior HSEQ Advisor NSW/ACT)

## 2.4 Site Inspection

The site inspection was conducted by Cheryl Halim on 10 July 2023, accompanied by Phillip Walmsley and Steve Hassett. The site inspection comprised a walkover of the facility.

## 2.5 Consultation

Geosyntec conducted consultation with DPE, EPA, and Port Stephen Council (Council) via submission into the Project Portal or email. Evidence of consultation is provided in Appendix C.

The outcome of the consultation is provided in Section 3.8.

## 2.6 Compliance Status Descriptors

The findings of the Audit have been divided into the following categories:

**Table 2.1. Compliance Evaluation**

Assessment	Criteria
Compliant	Sufficient verifiable evidence is available to demonstrate that all elements of the requirement have been met
Non-Compliant	One or more specific elements of the conditions or requirements have not been met
Not-Triggered	A requirement has an activation of timing trigger that has not been met at the time of the audit, therefore compliance is not relevant. Items not considered for Independent Environment Audit have also been recorded as "Non-Triggered."

## 3 Audit Findings

### 3.1 Approvals and Documents Audited

The following documents were audited:

**Table 3.1. Audited Documents**

Reference	Document Details
Environmental Impact Statement (EIS)	Jackson Environment and Planning Pty Ltd (30 November 2020) Environmental Impact Statement REMONDIS Australia Pty Ltd, Tomago Resource Recovery Facility and Truck Parking Depot (SSD-10447)
SSD 10447 Development Consent	SSD 10447 dated 12 October 2021.
SSD 10447 B8 Energy from Waste Management Plan	Remondis (27 June 2022) Energy from Waste Management Plan – Eligible Fuels.
SSD 10447 B10 Waste Monitoring	Remondis (20 April 2022 DRAFT) Tomago Resource Recovery Facility, Waste Monitoring Program
SSD 10447 B17 Long Term Environmental Management Plan	Remondis (16 May 2022) Long Term Environmental Management Plan, Tomago Resource Recovery Facility
SSD 10447 B26 Water Management Plan	Remondis (14 July 2022, revised in September 2023) Tomago Resource Recovery Facility and Truck Parking Depot Water Management Plan
SSD 10447 B36 Air Quality and Odour Management Plan	Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan
SSD 10447 C5 Operational Environmental Management Plan	Remondis (2 June 2022) Integrated Management Plan, Tomago Resource Recovery Facility
SSD 10447 Appendix 2 Emergency Response Management Plan	Remondis (11 March 2022) Tomago Resource Recovery Facility Emergency Response Management Plan
EPL21636 O4 Pollution Incident Response Management Plan	Remondis (22 March 2022) Pollution Incident Response Management Plan, Tomago Resource Recovery Facility

Other supporting documents reviewed are provided in the Audit Table in Appendix F.

### 3.2 Summary of Assessment of Compliance

A total of 129 items were assessed as part of SSD consent conditions. A summary of the findings is provided as follows:

- Number of compliances = 81 items
- Number of non-compliances = 6 items
- Number of non-triggered = 42 items

In addition, assessment of 134 items with regard to the implementation and compliance with the site's operational environmental management plans and EPL were conducted. A summary of the findings is provided as follows:

- Number of compliances = 99 items
- Number of non-compliances = 0 items
- Number of non-triggered = 35 items

### 3.3 Agency Notices, Orders, Penalty Notices or Prosecutions During Audit Period

Based on the information provided by Remondis, there have been no agency notices, orders, penalty notices or prosecutions during the Audit period.

### 3.4 Discussion of Non-Compliances

Details of the non-compliances to the SSD consent conditions identified are provided in Table 3.2.

**Table 3.2. Non-Compliances to SSD Consent Conditions**

Geosyntec ID	Document	SSD Condition No.	Details of Non-Compliance	Recommendations
G27	SSD	A27	This item is considered non-compliant because the Applicant acquired a written evidence that the premise is fibre-ready a few days after the issue of the Occupation Certificates, noting the SSD requirement is to obtain this prior to the OC.	No recommendation is made as the confirmation from Telstra has been obtained.
G55	SSD	B24	This item is considered non-compliant as there is insufficient evidence that the OSD has been constructed as per design plans by Northrop.	Confirmation should be obtained from Northrop to confirm that the OSD system has been completed per the design.
G75	SSD	B44	This item is considered non-compliant as Argon and Oxygen quantities listed in the inventory list provided are above the threshold of Appendix 7 Table 6 of Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33. However, Remondis states that the specified argon and oxygen amount in ChemAlert may be incorrect.	Inventory quantity for Argon and Oxygen should be checked. Where quantities exceed the quantity listed in Appendix 7 Table 6 of SEPP33, appropriate notification, manifest and emergency plans must be developed in accordance with the SEPP.
G92	SSD	B61	This item is considered non-compliant as insufficient evidence has been provided to confirm that the existing lighting for the development complies with the Condition B61. However, it is noted that no complaint has occurred on lighting.	The existing lighting on 21D School Drive Tomago should be checked to ensure that Condition B61 is met.
G102	SSD	C9	This item is considered non-compliant because evidence of submission of the revised Energy to Waste Management Plan within 6 weeks of revision (27 June 2023) was unable to be sighted.  It is noted that the earlier version of the Plan was provided to DPE. It is also noted that the Energy from Waste operation has not commenced at the time of the Audit.	The most recent Energy to Waste Management Plan must be submitted to DPE.
G112	SSD	C19	This item is considered non-compliant as the EIS, RTS, or any correspondence with DPE are not yet included in the project website.	Documents referred to in condition A2 (such as, but not limited to EIS, RTS, and any correspondence with website.

Geosyntec Document ID	SSD Condition No.	Details of Non-Compliance	Recommendations
			DPE) should be made publicly available in a website. If there are two websites/pages for the documents, each site/page should list or provide link to the other site/page.

### 3.5 Assessment from Previous Audits

There was no previous Operational or Construction Audit for the site.

### 3.6 OEMP, Sub-plans and Post Approval Documents

The Auditor considers that the OEMP and sub-plans are appropriate to minimise environmental impact during the operational phase, however the following minor recommendations are made:

- Waste Monitoring Program
  - Waste Monitoring Program provided is still in Draft form. This document should be finalised.
  - Waste Monitoring Program should consider SSD Condition B10(c) and include training for staff for the recognition and handling of prohibited waste, including asbestos.
- Air Quality and Odour Management Plan (AQOMP)
  - Air Quality and Odour Management Plan should consider SSD Condition B36 and provide more details on the following, for each emission source presented in Section 5:
    - Key performance indicators
    - Monitoring method
    - Location, frequency and duration of monitoring
    - Compliance reporting requirements for excessive odour and record of daily compliance
  - Air Quality and Odour Management Plan should provide the requirement to assess the need for carbon filter replacement and the methodology for replacement.
- Water Management Plan (WMP)
  - Water Management Plan should be reviewed to ensure accuracy and completeness. All tables and sections that are referred to in the document, should be provided.
  - SSD Condition B26 requires WMP to provide a program to monitor surface water quality. Section 6.3.1 states that analysis of surface water quality is to be monitored if required only. It is also recommended to clearly indicate if the monitoring program proposed in Section 6.3.1 will include visual inspection only or with sampling. It will be prudent to have the section updated to clarify the monitoring program, including the parameters to be tested, testing frequency, how and who will conduct the test.
  - WMP should clarify if the Council's Development Control Plan (DCP) (PSC, 2014) post-development requirements are applicable to surface water.

- WMP should clarify if Total Suspended Solids, Total Phosphorous, Total Nitrogen, Gross Pollutants, pH, electrical conductivity, dissolved oxygen, redox potential, turbidity will be analysed periodically on surface water samples.

### 3.7 Discussion of Other Matters

The Auditor does not consider that there are other matters, based on regulatory requirements and legislation or the development's past performance, other than those covered in this IEA.

### 3.8 Outcomes of Consultation with Relevant Agencies and/or Stakeholders

Prior to conducting the site audit, Geosyntec consulted with DPE, Port Stephen Council (Council), and EPA. Consultation correspondence and responses from the Agencies are provided in Appendix C. The consultation indicated:

- No response was received from DPE and Council.
- EPA did not provide input other than encouraging proponents' continual improvement in environmental performance.

### 3.9 Complaints and Management of Complaints

Remondis provided a complaint register, which is also available online at the Project website (<https://www.remondis-australia.com.au/locations/nsw/remondis-tomago-rrf>). There was no complaint within the current Audit period.

### 3.10 Incidents and Management of Incidents

Remondis advised that there was no notifiable incident during this Audit period. A hot load incident occurred on 16 Feb 2023, where a truck came with a hot load and required intervention. Upon discussion with DPE, Remondis indicated that DPE agreed that the incident was not notifiable.

Geosyntec recommends that if there is uncertainty on whether or not an incident requires notification to DPE, it would be prudent to notify DPE. Notification must be conducted in writing in accordance with the consent conditions. All incidents that require notification to EPA will need to be notified to DPE.

### 3.11 Performance of Environmental Management Plans

The review of mitigation measures listed in the EIS and associated documents associated with the operational phase versus the actual impact is assessed in the Audit Table, Appendix F, and is summarised in Table 3.3.

**Table 3.3. Environmental Impact Assessment**

Environmental Aspect	Requirement	Auditor's Review
Waste	<ul style="list-style-type: none"> <li>• Waste management and minimisation will form part of the induction program (which includes environmental due diligence training). All Project and site personnel will be trained in the requirements of this document including minimising wastes,</li> </ul>	<ul style="list-style-type: none"> <li>• During the site visit, Geosyntec sighted the Site Induction materials for staff, visitor, and contractor. The induction material includes management requirement to segregate different waste streams via colour-coded transport route and entrance number, recognising which types of materials are</li> </ul>

Environmental Aspect	Requirement	Auditor's Review
	<p>recognising which types of materials are recyclable and their obligations to use recycling facilities provided on site;</p> <ul style="list-style-type: none"> <li>• Clearly assign and communicate responsibilities to ensure that those involved in the construction are aware of their responsibilities in relation to the waste management plan;</li> <li>• Engage and educate personnel on how the various elements of the waste management plan will be implemented;</li> <li>• Specific locations for waste management (e.g. sorting area locations, recycling bin locations, material stockpile locations) will be established on site and signposted appropriately;</li> <li>• Waste management areas will be adequately managed to prevent sediment runoff and dust generation;</li> <li>• Construction Method Statements (CMS) will include practices to minimise waste generation and to maximise recycling and reuse of materials including oils, greases, lubricants, timber, glass, and metal (<i>this requirement is not applicable to Operational Stage</i>);</li> <li>• Packaging minimisation and reuse initiatives will be implemented as part of the procurement;</li> <li>• Development of an unexpected finds environmental procedure should any contamination be found during construction works (<i>this requirement is not applicable to Operational Stage</i>);</li> <li>• Spill kit to be present on site in the case of any fuel leaks of plant and equipment during the construction phase of the development;</li> <li>• Segregated waste disposal containers for the collection and recycling/disposal of all waste streams generated during the construction and operation phases will be provided onsite. Waste disposal containers will have clear signage and instructions for use to avoid cross-contamination. No rubbish shall be disposed of on site;</li> <li>• Waste will be disposed to an appropriate licensed facility. A Waste Management Register of all waste collected for disposal and / recycling, including amounts, data and time and details and location of disposal will be maintained at all times;</li> <li>• All waste being transported off-site must be covered. The transportation must be appropriately licensed to carry that material;</li> <li>• Storage of all hazardous substances and dangerous goods will be in accordance with SDS requirements in a bunded area. Solid and hazardous wastes will be contained and separated from inert waste;</li> <li>• Any hazardous will be managed and handled by an appropriately licensed contractor and transported for disposal to a licensed facility approved site;</li> </ul>	<p>recyclable and their obligations to use recycling facilities.</p> <ul style="list-style-type: none"> <li>• According to information provided by Remondis, waste streams coming and leaving the site have to go through weighbridge. June 2023 record were sighted via Clearweigh, Weighbridge record through Clearweigh for June 2023 was sighted during the Audit and the waste streams received and disposed of site included cages, ferrous iron or steel, food and garden, glass, mixed hydrocarbon, mixed waste, Nespresso reject, Nespresso cage, non-ferrous metals, oil, paper or cardboard, plastic, plastic film, timber pallets.</li> <li>• The Auditor sighted Daily Odour Assessment Form for 28 August 2023 to 1 September 2023.</li> <li>• Monthly inspections are conducted by the management team and the inspection includes how waste is managed.</li> <li>• Waste tipping, sorting, processing and storage were observed to be in paved areas and in the buildings, away from waterways and stormwater systems.</li> <li>• Waste segregation was observed on site.</li> <li>• Each material was observed to have a dedicated stockpile location.</li> <li>• The types of waste observed onsite included wastes that are included in the site EPL, such as mine waste (contaminated soil in drums, oily rags, waste oil), cardboard, plastic, coffee pods, glass, and timber.</li> <li>• Chemicals were observed to be present on areas that were paved and bunded.</li> <li>• Spill kits were observed on site. Based on the information provided by Remondis, spill within the chemical storage area will be collected for offsite disposal.</li> <li>• Based on observation during the Audit, no trucks were observed to be coming or leaving the site.</li> <li>• Based on the information provided by Remondis, no asbestos waste was received on site.</li> <li>• Wastes received were still being accumulated on site. Based on Remondis information, there were only metal, wood, paper and cardboard waste being transferred to offsite recycling facility.</li> <li>• During the Audit, there was no unacceptable odour or dust observed. Based on Remondis advice, activated carbon filter was present in the vicinity of the coffee processing area. As such, Remondis stated that odour neutraliser was not needed.</li> </ul>

Environmental Aspect	Requirement	Auditor's Review
	<ul style="list-style-type: none"> <li>Any material contaminated by spills i.e. fuel, oil, lubricants etc., including empty fuel, oil and chemical containers, will be stored in a sealed secure container within a bunded area and will be transported to a waste disposal site approved by the NSW EPA to accept such material;</li> <li>Incompatible wastes will not be mixed;</li> <li>Storage areas would be located away from waterways and the stormwater system;</li> <li>Biodegradable products will be used wherever practicable;</li> <li>Regular collection of wastes will ensure air emissions are at a satisfactory level. Inappropriate waste and wastewater management systems will be regularly inspected and audited;</li> <li>Conduct regular litter patrols to ensure litter is effectively controlled on site;</li> </ul>	
Air quality	<ul style="list-style-type: none"> <li>All waste tipping, sorting, processing and storage will occur indoors at all times;</li> <li>Implement a waste acceptance evaluation procedure to ensure all waste received on-site meets the relevant criteria;</li> <li>Use odour neutralisers;</li> <li>Availability of spill kits to allow for prompt containment of spills which could be odorous;</li> <li>Daily odour survey observations around the boundary of the site;</li> <li>Work procedures in the event of any particularly odorous loads (e.g. Use of odour neutraliser, identifying waste source and investigating possibility of diverting to another waste facility);</li> <li>Additional odour control system medium on-site at all times (e.g. Additional activated carbon to be stored on site).</li> </ul>	<ul style="list-style-type: none"> <li>The site has Air Quality and Odour Management Plan, which covers odour management.</li> <li>The Auditor sighted Daily Odour Assessment Form for 28 August 2023 to 1 September 2023.</li> <li>Waste tipping, sorting, processing, and storage were observed to be conducted indoor. Liquid waste, chemicals and fuels were stored within bunded areas and were observed to have cover, with the exception of the fuel cabinet located outside the chemical store, which was stored on hardstand. The unbunded chemical cabinet observed outside the chemical storage area was emptied following the Audit, with photographic evidence provided.</li> <li>The site has Waste Monitoring program which provides waste acceptance inspection at inspection bay prior unloading.</li> <li>No unacceptable odour or dust was observed during site inspection. Based on Remondis advice, activated carbon filter was present in the vicinity of the coffee processing area. As such, Remondis stated that odour neutraliser was not needed.</li> <li>Spill kits were observed on site.</li> </ul>
Greenhouse gas	<ul style="list-style-type: none"> <li>Minimise the use of fuel by selecting fuel efficient plant and equipment, operating vehicles and machinery in a fuel-efficient manner e.g. turning off idling equipment, and selecting construction techniques that utilise lower amounts of fuel;</li> <li>Implement a maintenance plan for all fuel and electrically powered equipment;</li> <li>Implement energy conservation practices by all staff (which can be enforced through appropriate training);</li> <li>Use solar panels.</li> </ul>	<p>All plant and equipment used on site are maintained via asset register record for weekly &amp; monthly Australian Bale Press and tri-monthly Bale Conveyance.</p>
Noise and vibration	<ul style="list-style-type: none"> <li>Avoid the coincidence of noisy plant working simultaneously close together would result in reduced noise emissions;</li> <li>Equipment which is used intermittently is to be shut down when not in use;</li> </ul>	<ul style="list-style-type: none"> <li>During the Audit, no unacceptable noise was observed.</li> <li>No record of complaint relating to noise was sighted.</li> </ul>

Environmental Aspect	Requirement	Auditor's Review
	<ul style="list-style-type: none"> <li>• Where possible, equipment with directional noise emissions should be oriented away from sensitive receivers;</li> <li>• Regular compliance checks on the noise emissions of all plant and machinery used for the proposal would indicate whether noise emissions from plant items were higher than predicted. This also identifies defective silencing equipment on the items of plant;</li> <li>• Non-tonal reversing alarms should be used on all items of plants and heavy vehicles used for construction;</li> <li>• Existing doors are closed during the waste processing whenever practicable (note this measure is not required to achieve the Project Noise Trigger Levels for the project and is at the discretion of the proponent).</li> </ul>	<ul style="list-style-type: none"> <li>• Based on interview with Remondis, non-tonal reversing alarms are used on all plant and heavy vehicles.</li> </ul>
Biodiversity during operation	<ul style="list-style-type: none"> <li>• Vehicles should not drive off the designated parking area into vegetation within the study area to reduce impact to resident fauna and flora within the study area during the operations phase;</li> <li>• Any animals injured during operations should be taken immediately to the Motto Farm Veterinary Hospital for treatment. Any animals suspected to require rehabilitation would be delivered post-veterinary care to an appropriate animal rehabilitator associated with Wildlife in Need of Care Phone 1300 946 295);</li> <li>• The following measures should be implemented to prevent exotic plant material from entering/exiting the study area: <ul style="list-style-type: none"> <li>- No imported/exported material to be permitted unless it has been inspected and confirmed to be free of dirt and mud which may contain weed seeds and vegetative material such as bulbs, root fragment, tubers or rhizomes;</li> <li>- Vehicles and machinery to be clean of soils, vegetation and seeds that have been brushed off or washed down prior to entering the study area;</li> <li>- A clean down register to be maintained at the entry of the study area; and</li> <li>- Trucks are not to drive off the designated parking area onto vegetation within the site;</li> </ul> </li> <li>• As a part of maintenance within the study area any high threat weeds known to occur will be controlled in accordance with appropriate DPI guidelines. Guidelines for the treatment of high threat weeds can be sourced within the DPI website;</li> <li>• Any artificial lighting used for security at night should be angled/directed downwards to avoid excessive light pollution affecting adjacent habitat.</li> </ul>	<ul style="list-style-type: none"> <li>• During the Audit, the majority of the site was observed to be paved, with the exception of some garden beds.</li> <li>• Vehicles were observed to be in paved areas.</li> <li>• External was is observed to be directed downwards.</li> <li>• Based on the information provided by Remondis, no injured animals had been encountered.</li> </ul>
Soil and water	<ul style="list-style-type: none"> <li>• All waste handling and storage will be under cover and within bunded areas.</li> <li>• Each of the main buildings (Buildings 1, 2 and 3) will have internal bunds to contain any</li> </ul>	<ul style="list-style-type: none"> <li>• The site has Soil and Water Management Plan and Sections 2.2.1 &amp; 2.2.2 document the implementation of stormwater drains onsite.</li> <li>• During the site inspection waste tipping, sorting, processing, and storage were observed to be</li> </ul>

Environmental Aspect	Requirement	Auditor's Review
	<p>leaks or spills within them. They will also contain any fire water, if necessary.</p> <ul style="list-style-type: none"> <li>• A stormwater capture and treatment system will be installed to treat water from the truck parking depot. This will supplement the existing stormwater treatment system, which treats stormwater from the existing paved area. The following water quality treatment devices will be utilised:               <ul style="list-style-type: none"> <li>- OceanGuard Pit Filter Insert – Runoff captured by the hardstand will pass through a filter insert that will aid in the capture of gross pollutants, sediment, litter and oils. An oil absorbent pillow will also be installed as part of the filter insert, which will assist in the capture of small amounts of hydrocarbons or oils that would otherwise enter the stormwater system.</li> <li>- Ocean Protect Psorb Filter Cartridges – Proprietary filter cartridges will filter stormwater runoff capturing and removing fine sediment, as well as nutrients including phosphorous and nitrogen.</li> </ul> </li> <li>• An emergency shutoff valve will be installed for the new stormwater system that will contain any oil or diesel spills and prevent them from entering the stormwater infiltration system.</li> </ul>	<p>conducted indoors. Liquid waste, chemicals and fuels were stored within bunded areas and were observed to have cover, with the exception of the fuel cabinet located outside the chemical store on paved area. The unbunded chemical cabinet observed outside the chemical storage area was emptied following the Audit, with photographic evidence provided.</p> <ul style="list-style-type: none"> <li>• Each main building was observed to be bunded.</li> <li>• Dangerous goods were observed to be stored in the workshop and in the paved chemical areas with a blind water collection system. Remondis advised that any spill into this containment will be collected for offsite disposal.</li> <li>• Some drums in the chemical storage area were observed to have the taps outside the bunded area. Photographs provided after the Audit indicated this had been rectified.</li> <li>• Above ground diesel tank and waste oil tanks were observed to be present on paved areas at the refuelling station.</li> <li>• Spill kits were observed on site.</li> <li>• The diesel tank has a plate stating compliance to AS 1692-2006 and AS1657-1992 and AS1940-2017 UL 142 &amp; ULC-S601.</li> </ul>
Heritage	<ul style="list-style-type: none"> <li>• All on-site personnel are to be made aware of their obligations under the National Parks and Wildlife Act 1974, this includes protection of Aboriginal sites and the reporting of any new Aboriginal, or suspected Aboriginal, heritage sites. This may be done through an onsite induction or other suitable format;</li> <li>• All on-site personnel are to be made aware of their obligations under the NSW Heritage Act 1977, including the reporting of any historic, or suspected historic material. This may be done through an onsite induction or other suitable format;</li> <li>• In the unlikely event that Aboriginal or suspected Aboriginal archaeological material is uncovered during the development, then works in that area are to stop and the area cordoned off. The project manager is to contact the heritage consultant to make an assessment as to whether the material is classed as Aboriginal object/s under the National Parks and Wildlife Act and advise on the required management and mitigation measures. Works are not to re-commence in the cordoned off area until heritage clearance has been given and/or the required management and mitigation measures have been implemented;</li> </ul>	<ul style="list-style-type: none"> <li>• The site has Aboriginal Cultural Heritage Awareness Training.</li> <li>• Based on the information provided by Remondis, no Aboriginal or suspected Aboriginal archaeological material has been uncovered to date.</li> </ul>
Bushfire	<ul style="list-style-type: none"> <li>• At the commencement of building works and in perpetuity, manage an inner protection area (IPA) for the entire property as outlined within Appendix 4 of Planning for Bush Fire Protection (2019) and the NSW Rural Fire Service's Standards for Asset Protection Zones;</li> </ul>	<ul style="list-style-type: none"> <li>• The site has Emergency Management Plan which comprises a Bushfire response program.</li> <li>• During the site inspection, the site was observed to be mostly paved, with only small garden beds.</li> </ul>

Environmental Aspect	Requirement	Auditor's Review
	<ul style="list-style-type: none"> <li>Undertake landscaping in accordance with Appendix 4 of Planning for Bush Fire Protection (2019) and manage and maintain in perpetuity;</li> <li>Property owner and occupants to familiarise themselves with the relevant bushfire preparation and survival information provided by the New South Wales Rural Fire Service;</li> <li>Implement emergency evacuation plans prepared for the workplace with specific consideration of bushfire evacuation and management planning;</li> </ul>	
Contamination	<ul style="list-style-type: none"> <li>Implement remedial measures as detailed in the Remedial Action Plan,</li> <li>Prepare and implement a Long-Term Environmental Management Plan.</li> </ul>	<ul style="list-style-type: none"> <li>The site was remediated and signed by NSW CLM Auditor.</li> <li>The site has LTEMP. Remondis states that the LTEMP is still enforced.</li> </ul>
Chemicals, fuels and pollution incidents	<ul style="list-style-type: none"> <li>All liquid wastes, chemicals and fuels to be handled and stored under cover in bunded areas;</li> <li>All staff working in areas with liquid wastes to be properly trained and wear PPE at all times;</li> <li>MSDS sheets, where available, to be readily accessible for all chemicals on site;</li> <li>Chemical spill kits and "absorbent sausages" to be kept on site and readily accessible near liquid waste and chemical storage;</li> <li>Firefighting equipment to be accessible and regularly inspected.</li> </ul>	<ul style="list-style-type: none"> <li>During inspection, waste types were observed to be segregated inside the buildings.</li> <li>Based on information provided by Remondis during the site visit, the site has not received any drilling mud waste.</li> <li>During the site inspection, dangerous goods were observed to be stored in the workshop and in the paved chemical areas with a blind collection system. Remondis advised that any spill into this containment will be collected for offsite disposal.</li> <li>Some drums in the chemical storage area were observed to have the taps outside the bunded area. Photographs provided after the Audit indicated this had been rectified.</li> <li>Unbundled chemical cabinet observed outside the chemical storage area were emptied following the Audit.</li> <li>Above ground diesel tank and waste oil tanks were observed to be present on paved areas at the refuelling station.</li> <li>The diesel tank has a plate stating compliance to AS 1692-2006 and AS1657-1992 and AS1940-2017 UL 142 &amp; ULC-S601.</li> <li>Remondis advised that tankers have automatic shut-off mechanisms, storage tank bunds were built in accordance with Australian Standards, no underground pipes are present, and no leaks was detected in this new facility.</li> <li>Remondis also advised that the waste oil tank is fitted with alarm. The levels can be viewed online with GES online system. GES was sighted by Geosyntec during the Audit.</li> <li>Spill kits were observed on site and near the chemical storage.</li> <li>Firefighting equipment was sighted on site during inspection.</li> <li>During the site visit appropriate PPEs were observed to be worn by staff.</li> <li>During the Audit, Geosyntec sighted ChemAlert, which provides a list of chemicals stored onsite. Examples of SDS documents were sighted through ChemAlert.</li> <li>Tool Box Topic #28 (Spill Control) records for 11, 12, 13, 14, and 20 July 2023 were sighted.</li> </ul>

Environmental Aspect	Requirement	Auditor's Review
Fire safety	<ul style="list-style-type: none"> <li>• Building 1 will be fitted with ridgeline exhaust fans capable of extracting smoke at the rate of 18m<sup>3</sup>/s within 10 minutes of the fire reaching steady heat release;</li> <li>• Building 1 will have a minimum 10mm high perimeter bund around the inside of the building;</li> <li>• Building 2 will be fitted with ridgeline exhaust fans capable of extracting smoke at the rate of 17m<sup>3</sup>/s within 6 minutes of the fire reaching steady heat release;</li> <li>• Building 2 will have a minimum 16mm high perimeter concrete bund around the inside of the building;</li> <li>• Building 3 will be fitted with ridgeline exhaust fans capable of extracting smoke at the rate of 26m<sup>3</sup>/s that are interlocked with the fire alarm;</li> <li>• Building 3 will have a minimum 5mm high perimeter concrete bund around the inside of the building;</li> <li>• Internal stockpiles will be arranged to allow for six (6) metres unobstructed access around internal stockpiles; and o Internal stockpiles will have a maximum volume of 1000m<sup>3</sup>.</li> <li>• Provide an emergency tipping area, such as the undeveloped areas on Site 21F, at least 10 metres from parked vehicles and within a 70 metre radius of hydrant FH5;</li> <li>• Use portable infrared detectors to check for thermal hotspots;</li> <li>• Install fixed infrared cameras with audible alarm at five (5) identified high fire load locations;</li> <li>• Install automatic sprinkler system in Building 2;</li> <li>• Building 2 will require the installation of 4 x 36m (DN19) fire hose reels adjacent personal access doors to ensure coverage of the building internal floor area;</li> <li>• 2A 60B(E) 9 kg powder fire extinguishers will be installed on all the vehicles working in the vicinity of the fire compartments;</li> <li>• 5 x 2A 60B(E) 9 kg powder fire extinguishers to be inside the recycling plant; o Lithium batteries must be stored in accordance with the Dangerous Goods Code and AS/NZS 4681:2000 The storage and handling of Class 9 (miscellaneous) dangerous goods and articles; and</li> <li>• Plastics will be removed on a regular basis to ensure that individual storage areas, no greater than 20m<sup>2</sup> and 2 metres high, are separated from adjoining storages by no less than 2.4 metres.</li> </ul>	<ul style="list-style-type: none"> <li>• Site Occupation Certificate (21-057-OC2) issued by Newcert was sighted and fire safety certificate was also included.</li> <li>• Based on information provided by Remondis, batteries were separated from other waste streams and stored in accordance with Dangerous Goods Codes.</li> <li>• During the site inspection, plastic bails were observed to be less than 2m high, but covered an area of &gt;20m<sup>2</sup>. Remondis advised that plastic waste is removed when they reach 1 container volume and was about to be removed at the time of the Audit.</li> </ul>
Visual impact	<ul style="list-style-type: none"> <li>• Preferably plant native trees and large shrubs along the boundary to help screen the proposed development from future development of adjacent Lots;</li> </ul>	<ul style="list-style-type: none"> <li>• Trees have been planted around the truck parking area.</li> <li>• Trees were also observed on the south-eastern boundary adjacent to the road. On the southern</li> </ul>

Environmental Aspect	Requirement	Auditor's Review
	<ul style="list-style-type: none"> <li>Ensure the proposed development is offset from the boundary to allow screen planting;</li> <li>Plant native trees along the road verge of 21D to reduce views to the proposed development from future development.</li> </ul>	boundary, Geosyntec noted no planting space was available.

### 3.12 Evidence Collected through Site Inspection

The evidence collected during the site inspection is recorded in Appendix E and F and included:

- Observation of operational vehicles, weighbridge, traffic access, turning & parking areas, truck routes, pedestrian pathways, and fencing.
- Observation of waste handling, processing, movement, and storage.
- Observation of odour and noise levels.
- Observation of any contamination issues (such as dust, odour, surface condition, chemical stain, sediment/debris on the road).
- Observation of appropriate waste storage and disposal.
- Observation of chemical storage practises, bunding, and condition of decanting area(s).
- Observation of tree planting.

### 3.13 Evidence to Support Compliance Assessment

Evidence provided during the Audit comprised the following:

- Various environmental inspection records, reports, and management plans
- Site induction materials, induction records
- Certificates, permits and licenses
- Weighbridge records
- Correspondences between Remondis, DPE, Council and other stakeholders.
- Other documents required by the conditions of consent

### 3.14 Environmental Management Improvement Opportunities

The Auditor's recommendations on improvement opportunities are provided in Section 4.

### 3.15 Key Strengths of the Project Environmental Management and Performance

During the audit process, Remondis demonstrated an understanding of the requirements for environmental management with good record keeping. Where potential environmental issues were identified and flagged during the site inspection, Remondis demonstrated positive behaviour in rectifying such issues and were open to discussions on suggested improvements.

## 4 Recommendations and Opportunities for Improvements

The Auditor makes the following recommendations to improve record keeping and/or work practices onsite:

- Administrative:
  - Please update the OEMP subplans in accordance with the recommendations made in Section 3.6 of this report. It would be prudent to have a register of the changes listed in the plans.
  - The most recent Energy to Waste Management Plan must be submitted to DPE.
  - Documents referred to in condition A2 (such as, but not limited to EIS, RTS, and any correspondence with DPE) should be made publicly available in a website. If there are two websites/pages for the documents, each site/page should list or provide link to the other site/page.
  - It would be prudent to update the phone menu in the Complaints Line to include complaints, in addition to sales menu.
  - Strategies, plans and programs under the development consent must be reviewed within 3 months of submission of this IEA Report or any other items listed in Section C8 of the consent conditions.
  - A copy of this IEA and Remondis's response must be uploaded to the public website following completion of this IEA.
  - Please consider revising the Integrated Management Plan (IMP) to reflect the fact that all mobile plants no longer require to be fitted by spark arrest equipment.
  - Confirmation should be obtained from Northrop to confirm that the OSD system is has been completed per the design.
- Chemicals:
  - Inventory quantity for Argon and Oxygen should be checked. Where quantities exceed the quantity listed in Appendix 7 Table 6 of SEPP33, appropriate notification, manifest and emergency plans must be developed in accordance with the SEPP.
  - Chemical containers and drums, including their taps should be placed wholly within their bunding. Decanting of chemicals should be conducted in bunded areas.
  - Installation of Quickbreaks on diesel and Adblue hoses should be completed.
- Waste: Signage should be provided for all different waste/material types.
- Lighting: The existing lighting on 21D School Drive Tomago should be checked to ensure that Condition B61 is met.
- Incident: If there is uncertainty on whether an incident requires notification to DPE, it would be prudent to notify this to DPE. Notification must be conducted in writing in accordance with the consent conditions. All incidents that require notification to EPA will need to be notified to DPE.
- Groundwater: Time of groundwater sampling should be included in the future groundwater monitoring report.

## 5 Limitations

This report has been prepared by Geosyntec Consultants Pty Ltd (“Geosyntec”) for use by the Client who commissioned the works in accordance with the project brief only, and has been based in part on information obtained from the Client and other parties. The findings of this report are based on the scope of work outlined in Section 1. The report has been prepared specifically for the Client for the purposes of the commission, and use by any explicitly nominated third party in the agreement between Geosyntec and the Client. No warranties, express or implied, are offered to any third parties and no liability will be accepted for use or interpretation of this report by any third party (other than where specifically nominated in an agreement with the Client).

This report relates to only this project and all results, conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose. This report should not be reproduced without prior approval by the Client, or amended in any way without prior written approval by Geosyntec.

Geosyntec’s assessment was limited strictly to identifying environmental conditions associated with the subject property area as identified in the scope of work and does not include evaluation of any other issues.

Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this report are based on the information obtained at the time of the investigation.

This report does not comment on any regulatory obligations based on the findings. This report relates only to the objectives stated and does not relate to any other work conducted for the Client.

The absence of any identified hazardous or toxic materials on the site should not be interpreted as a guarantee that such materials do not exist on the site.

All conclusions regarding the site are the professional opinions of the Geosyntec personnel involved with the project, subject to the qualifications made above. While normal assessments of data reliability have been made, Geosyntec has not independently verified and assumes no responsibility or liability for errors in any data obtained from regulatory agencies, statements from sources outside of Geosyntec, or developments resulting from situations outside the scope of this project.

Geosyntec is not engaged in environmental assessment and reporting for the purpose of advertising sales promoting, or endorsement of any client interests, including raising investment capital, recommending investment decisions, or other publicity purposes. The Client acknowledges that this report is for its exclusive use.

## Appendix A Figures



Source: Remondis Water Management Plan 21D & 21F School Dr., Tomago

**LEGEND**

 Site Boundary

Figure 1: Site Layout Plan

Site Address: Tomago Resource Recovery Facility 21D and 21F School Drive, Tomago NSW 2322

Client: Remondis Australia Pty Ltd

Job Number: AU122283

Date: September 2023

This product has been created to support the main report and is not suitable for other purposes.

Approx. 10 m

Datum: GDA 1994 MGA Zone 56 - AHD

## Appendix B Auditor Declaration

## Independent Audit Declaration Form

Project Name	Remondis Tomago Resource Recovery Facility
Consent Number	SSD 10447
Description of Project	Operation of a Resource Recovery Facility to process solid and liquid waste from municipal, commercial, industrial and construction sources for reuse and recycling.
Project Address	21D and 21F School Drive Tomago NSW 2322
Proponent	Remondis Australia Pty Ltd
Title of Audit	Independent Environmental Audit of the Remondis Tomago Resource Recovery Facility
Date	10 October 2023

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Auditor/Technical Specialist	Cheryl Halim
Signature	
Qualifications	<ul style="list-style-type: none"> <li>• Exemplar Global AU (ISO 19011:2018) (No. 11280933-7383767)</li> <li>• BE (Chemical)</li> <li>• PhD (Chemical Engineering)</li> </ul>
Name of Support Auditor	Fiona Wong
Signature	

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Qualifications	<ul style="list-style-type: none"><li>• BE (Environmental)</li><li>• Master of Environmental Management</li></ul>
Name of Support Auditor	<b>Cissillia Young</b>
Signature	
Qualifications	<ul style="list-style-type: none"><li>• BE (Chemical)</li><li>• PhD (Chemical Engineering)</li></ul>
Company	<b>Geosyntec Consultants Pty Ltd</b>
Company Address	<b>1 York St Sydney NSW 2000</b>

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## Appendix C Correspondence

AU122283 L1 SSD10447 Remondis Tomago Notification to DPE 28Apr23

28 April 2023

Department of Planning and Environment

Via Project Portal

Dear Sir/Madam,

**Re: Independent Environmental Audit, SSD10447, Remondis Tomago Resource Recovery Facility 21D and 21F School Drive, Tomago NSW 2322**

Geosyntec Consultants Pty Ltd (Geosyntec) has been engaged by Remondis Australia Pty Ltd (Remondis) to conduct an operational Independent Environmental Audit project for Tomago Resource Recovery Facility 21D and 21F School Drive, Tomago NSW 2322 ('the site'). The site is listed as Lot 8 and 11 DP 270328 and Part Lot 301 DP 634536 <sup>1</sup>.

The Independent Environmental Audit is conducted to meet Conditions C16 and C17 of SSD 10447 approval (12 October 2021), which state:

Within one year of the commencement of operation of the development, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must:

- C16
- a. be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020)
  - b. be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and
  - c. be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary).

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In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must:

- C17
- a. review and respond to each Independent Audit Report prepared under condition C16 of this consent;
  - b. submit the response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations;
  - c. implement the recommendations to the satisfaction of the Planning Secretary; and
  - d. make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before this is done.

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The Independent Environmental Audit will be conducted in accordance with the NSW Government Independent Audit Post Approval May (June 2020) (IAPAR 2020).

The proposed audit team includes Cheryl Halim as Lead Auditor, Rebeka Hall as alternate Lead Auditor assisted by Fiona Wong and Cissillia Young as Support Auditors. Qualifications are

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<sup>1</sup> This Lot and DP is based on the SSD 10447 conditions of consent.

included as Attachment A to this letter and the completed declaration form in accordance with IAPAR 2020 is provided in Attachment B.

The lead environmental auditor and auditor/technical specialists have completed a significant number of environmental site assessments, environmental management, and site audits on similar sites as identified in Attachment A.

Should you have any queries or wish to discuss any points, please do not hesitate to contact the undersigned.

Yours sincerely,



**Cheryl Halim**  
**Independent Environmental Auditor/  
Exemplar Global AU (ISO 19011:2018)**  
**(No. 11280933-7383767)**  
**Geosyntec Consultants Pty Ltd**



**Rebeka Hall**  
**Independent Environmental Auditor/  
Exemplar Global AU (ISO 19011:2018)**  
**(No. 11280933-7383767)**  
**Geosyntec Consultants Pty Ltd**

Attachments: Attachment A – CVs  
Attachment B – Declaration

## Attachment A – CVs



## PROFESSIONAL SUMMARY

Cheryl has over seventeen years' experience in environmental assessment, remediation and management and has conducted contaminated land site audits in New South Wales, Western Australia, Australian Capital Territory, and South Australia. Cheryl's postgraduate qualification in chemical engineering and waste provide specialist skills in assessing for environmental and waste compliance. Cheryl is a NSW EPA accredited site auditor and an Exemplar Global Auditor and has conducted several independent environmental audits in accordance with NSW Government (2018 & 2020) Independent Environmental Audit Post Approval Requirements.

Cheryl has recently been involved in providing advice for WA Department of Water and Environmental Regulation and NSW Department of Health. Cheryl has conducted health risk assessments for a variety of projects including service stations, colliery, and for the NSW Department of Health.

## QUALIFICATIONS

*B.E. (Hons), Chemical Engineering, University of New South Wales*

*PhD, Chemical Engineering, University of New South Wales*

*Accredited Contaminated Site Auditor, NSW EPA (No. 2201)*

*Exemplar Global AU & TL (ISO 19011:2018) (Cert. No. 11280933-7383767)*

## SPECIALTIES

*Site Investigations, Remediation and Validation*

*Project Management*

*Risk Assessment*

*Contaminated Land Site Audits*

*Independent Environmental Audits*

*Landfill, Waste*

*Environmental Management Plans*

*Due Diligence*

*Specialist Advice*

## MEMBERSHIPS AND TRAINING

- Asbestos Interest Group Committee, Australasian Land & Groundwater Association (ALGA)
- Principles of Risk Assessment and Management, South Australian Centre for Public Health, 2008
- ALGA A-Z Ground Gas Workshop, 2016
- Occupational Health & Safety (OHS) General Induction, WorkCover NSW, 2006
- 48 Hour OHS Training and 8 Hour Occupational Safety & Health Administration Refresher Training, Coffey Environments, 2007
- Track Safety Induction, Southern Cross Rail, 2006
- Electrical Awareness Training, Southern Cross Rail, 2006
- OHS Consultation, WorkCover NSW, 2005

## KEY PROJECT EXPERIENCE

### Independent Environmental Audits

**Confidential Client** – Auditor for the review of compliance to Client's standards and environmental management system for 18 mines in NSW and QLD.

**Remondis Tomago** – Lead Auditor for the operation of Remondis Tomago Waste Recycling Centre. Almost complete in 2023.

**Rumba Lara development, Gosford, NSW** – Lead Auditor for the construction of Rumba Lara residential development (required as part of SSD 10321).

**Roseville College, Roseville** – Lead Auditor for the construction phase of the Roseville College (required as part of SSD 9912).

**Jindabyne Educational Complex, Jindabyne** – Auditor for the construction phase of the Roseville College (required as part of SSD 15788005).

**Vopak Site B4A** – Auditor for the construction and operational phase of the Vopak Site B4A bulk liquid storage (required as part of SSD 7000).

**Holt Land Rehabilitation Centre** – Auditor for the operational phase of the landfill operation (voluntary audit).

**Brewery Yard, Chippendale** – Auditor for the operational phase of the former Brewery Yard building for commercial use (required as part of SSD 9374).

**UNSW Cliffbrook Stage 1 Heritage-Listed Building Refurbishment** – Lead Auditor for the construction phase of the UNSW Cliffbrook Stage 1 development (required as part of SSD 8126).

**Western Sydney University, Bankstown, NSW** – Auditor for the construction of Western Sydney University (required as part of SSD 9831).

**Iglu Redfern 2, Redfern, NSW** – Auditor for the construction of Iglu Redfern 2 (required as part of SSD 9275).

**Cranbrook School, Bellevue Hill, NSW** – Lead Auditor and waste specialist for the construction and operation of Cranbrook School (required as part of SSD 8812).

**Sydney Zoo, Bungarribee, NSW** – Auditor and waste specialist for the construction and operation of Sydney Zoo (required as part of SSD 7228).

**Western Sydney University, Parramatta, NSW** - Auditor for the construction of Western Sydney University (required as part of SSD 9670).

## Audit

Audit assistant for over 100 statutory and non-statutory audits under the NSW CLM Act 1997 and other states. General scope of work included review of environmental assessment reports, environmental compliance during remediation, waste compliance, preparation of site audit reports.

**The Shore School, North Sydney, NSW** – Audit assistance on the redevelopment of the Shore School (required as part of SSD).

**Ferrovial York Joint Venture Warringah Road Expansion** – Audit assistance for the Warringah Road expansion, which is required by state significant infrastructure (SSI) conditions.

**Cumberland Council, Pemulwuy** – Audit assistance for the proposed commercial/industrial development at Council land at Pemulwuy.

**Thirdl Group, 31-41 William Street, Alexandria** – Audit assistance for the development of a high density residential building with basement carpark.

**Bathla Group, Schofields, NSW** – Audit assistance on the proposed low density residential land subdivision at Schofields.

**Stockland, Marsden Park, NSW** – Audit assistance on the proposed low density residential land subdivision at Marsden Park.

**Meriton, Lidcombe, NSW** – Audit assistance on the proposed high density residential apartments in staged process.

**EG Funds, Summer Hill, NSW** – Audit assistance on the proposed high density residential apartments and open space landuses in staged process.

**Endeavour Energy, Harris Park, NSW** – Audit assistance on the proposed low density residential land.

**Meriton Group, 330 Church Street, Parramatta, NSW** – Audit assistance on the proposed open space landuse.

**Thirdl Group & Milligan Group, 830-838 Elizabeth Street, Waterloo, NSW** – Audit Assistance on the proposed high density residential property.

**The ACT Government, Capital Metro Project, Canberra, ACT** – Audit assistance on the proposed light rail route from Civic to Gungahlin.

**Viva Energy Australia, Coles Express Service Station, 194 Pacific Highway** – Audit assistance on the site audit of a Coles Express Service Station, where petroleum hydrocarbon impact has migrated offsite to an adjacent residential apartment.

**Parklane Group, 63-85 Victoria Street, Beaconsfield, NSW** – Audit assistance on the proposed residential development at Beaconsfield.

**XR Property Developments, 146-156 Botany Road, Alexandria, NSW** – Audit assistance on the proposed residential development at Alexandria. The site has been notified to the EPA due to the offsite migration of petroleum hydrocarbon.

**Central Coast Automotive, Gosford, NSW** – Audit assistance on a large parcel of land, comprising former service station, former vehicle maintenance, former carwash buildings.

**Ceedive, Former Lithgow Pottery Estate, NSW** – Audit assistance on a former pottery estate site at Lithgow.

**Forbes City Council, Former Forbes Gasworks, NSW** – Audit assistance on a former Forbes Gasworks.

**Gunnedah Council, Gunnedah Airport, NSW** – Audit assistance on a former pesticide spraying facility, Gunnedah Airport, Gunnedah.

### Risk Assessment

**Dahua, Waterloo, NSW** – Review of human health risk assessment report for the proposed high density residential and open space landuse development for impact from offsite dry cleaning facility. The review was conducted as part of a site audit.

**PDS Group, Pyrmont, NSW** – Review of human health risk assessment report for the proposed high density residential and commercial development for impact from historical Council depot. The review was conducted as part of a site audit.

**VIG Group, Pagewood** – Review of human health risk assessment reports and development of site-specific screening level for the proposed low density and high density residential, open space and commercial/industrial development. The review was conducted as part of a site audit.

**ThirdI Group, Alexandria, NSW** – Review of human health risk assessment report for the proposed high density residential and commercial development. The review was conducted as part of a site audit.

**Penrith City Council, Penrith, NSW** – Review of human health risk assessment report for the proposed park and high density residential development. The review was conducted as part of a site audit.

**McNally Management, Alexandria, NSW** – Review of human health risk assessment for a high density residential apartment. The review was conducted as part of a site audit.

**Various Caltex and Mobil Service Stations** – Health risk assessment of potential soil, groundwater and soil vapour impact at former Caltex and Mobil service stations.

**Boral Limited, Confidential site** – Health risk assessment of the potential risk of water from colliery used by mine workers and nearby village residents.

**NSW Department of Health** – Onsite health risk assessment of potential risk of groundwater contamination in a slab-on-ground building of a former ambulance station.

**Caltex Refinery, Kurnell, NSW** – Qualitative risk assessment studies of the processes and the current status of soil and groundwater contamination at Caltex Refinery, Kurnell.

### Site Assessment and Remediation

**City of Sydney Council, Federal Park, Annandale, NSW** – Detailed site investigation, remediation and validation of Federal Park, Annandale. The contamination identified included PAHs and asbestos. Remediation comprised capping of impacted material beneath validated material over the entire site. The site is subject to a long term environmental management plan.

**UrbanGrowth NSW, North Eveleigh West and South Eveleigh, NSW** – Site investigation at the North Eveleigh West (approximately 3ha) and South Eveleigh (approximately 4.8ha) proposed residential development, which is a major development project in Sydney. Scope of work included project management, review of historical records and investigation reports, preparation of sampling plan for a detailed site investigation, preparation of investigation reports, preparation of remedial action plans (RAPs), liaison with Urban Growth NSW, site auditor, design team and other stakeholders.

**NSW Ports, Intermodal Terminal Centre at Enfield, NSW** – Validation of the Intermodal Terminal Centre at Enfield (ILC @ Enfield). Various contamination (including asbestos, petroleum hydrocarbon, etc.) was present at the site. The scope of work included review of significant number of available reports and documents provided by NSW Ports and contractors, preparation of validation reports, liaison with contractors and site auditor. I have prepared all the validation reports for the site, which were approved by the site auditor, resulting in site auditor sign off.

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## *PwC's Auditor Training*

### Certificate of Attainment

*awarded to*

***Cheryl Halim***

## *Becoming a Skilled Lead Auditor*

Exemplar Global AU - Auditing Management Systems (ISO 19011:2018)

Exemplar Global TL - Lead Audit Teams (ISO 19011:2018)



Certificate No: 11280933-7383767

Course End Date: 26 Mar 2021

Certificate Issue Date: 27 Mar 2021



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Tom Barham

Training Manager



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## NSW Site Auditor Scheme

### NOTICE OF ACCREDITATION AS SITE AUDITOR UNDER CONTAMINATED LAND MANAGEMENT ACT 1997 (NSW)

**Auditor:** Dr Cheryl Halim

**Accreditation No:** 2201

**Accreditation Date:** 30 November 2022

**Period of Accreditation:** One (1) year

The Environment Protection Authority (EPA) advises that **Dr Cheryl Halim** (the auditor) has been granted accreditation under s.51 of the *Contaminated Land Management Act 1997* (the Act) as a site auditor for a period of one **(1) year** subject to the following conditions:

1. The auditor must maintain a good knowledge of NSW legislation relating to contaminated sites and environment protection in general, including the:
  - (a) Act and any regulation made under that Act;
  - (b) other environment protection legislation (as defined by the Protection of the Environment Administration Act 1991) administered by the EPA; and
  - (c) Environmental Planning and Assessment Act 1979, and regulations and relevant environmental planning instruments made under that Act.
2. The auditor must maintain a good understanding of guidelines made or approved by the EPA under s.105 of the Act.
3. The auditor must hold insurance cover which complies with the following requirements:
  - (a) the cover applies to the occupation of site auditor and the activities to be carried out as a site auditor accredited under the Act, and
  - (b) the policy is for not less than \$5,000,000 cover for any 12 month period.
4. Within 14 days of renewing the insurance cover held for the purposes of condition 3, the auditor must forward to the EPA written confirmation from the insurer that the cover is in force and complies with the requirements of condition 3.
5. The auditor must pay an accreditation fee of \$8,377 to the EPA within one month from the date of the tax invoice.

A handwritten signature in black ink, appearing to read 'Karen Marler', is written over a horizontal line.

30/11/2022

**Karen Marler**  
**Director Environmental Solutions – Chemicals, Land and Radiation**  
**Regulatory Practice and Environmental Solutions Division**

**Notes**

- The auditor must comply with the Act and any regulation made under the Act. This includes a requirement to provide an annual return as specified under s.53D of the Act.
- The auditor's accreditation expires at the end of the accreditation period unless renewed in accordance with the Act and Regulations. The Contaminated Land Management Regulation 2022 provides that applications for renewal must be made between 30 and 60 days before expiry of the current accreditation period.
- The EPA may suspend or revoke the auditor's accreditation in accordance with s.56 of the Act.



## PROFESSIONAL SUMMARY

Rebeka Hall is a qualified Principal Environmental Scientist with specialisation in geology. Rebeka has over 25 years environmental consulting experience in a range of health, waste and pollution issues particularly the site assessment, remediation and auditing.

Rebeka is an NSW EPA Accredited Site Auditor and Exemplar Global Auditor ((ISO 19011:2018) (Cert. No. 7090818-5136510)). Areas of specialisation include independent peer review, environmental compliance & due diligence auditing, Phase 1 and II soil, water, soil vapour and groundwater investigations, design and implementation of remediation systems, water quality studies, groundwater studies including pumping tests, geological interpretations, land capability studies, environmental management plans and pollution and compliance monitoring.

## QUALIFICATIONS

*B.Env.Sc., Geology,  
University of Wollongong*

*Accredited Contaminated Site  
Auditor, NSW EPA (No. 0802)*

*Exemplar Global AU & TL  
(ISO 19011:2018) (Cert. No.  
7090818-5136510)*

*CEnvP (Site Contamination  
Specialist) (No. SC40913)*

## SPECIALTIES

*Environmental Audits -  
Statutory/Non-Statutory,  
Compliance, Due Diligence*

*Specialist Peer Review*

*Environmental Management  
Plans*

*Contaminated Site  
Investigation*

*Site Remediation Feasibility  
Design and Implementation*

*Site Validation*

*Works Management*

## MEMBERSHIPS AND TRAINING

- Member, Australian Land and Groundwater Association (ALGA)
- Member, Environment Institute of Australia and New Zealand (EIANZ)
- Contaminant Transport Modelling ANSTO, University of Science & Technology, Sydney
- Risk Based Corrective Action (RBCA) for Chemical Releases, GS Inc.
- Mergers & Acquisition Auditing, ERM Group
- USEPA 40hr Occupational Health & Safety Training for Contaminated Sites
- WorkCover OHS General Induction for Construction Work in NSW (White Card)
- ALGA Hazardous Ground Gas Assessment and Mitigation
- CSARM Lecturer (at UTS) in Risk Assessment in the Audit Process

## KEY PROJECT EXPERIENCE

### Audit

Rebeka, as the Lead Auditor, has conducted more than 160 site statutory and non-statutory audits across in NSW and ACT. Audit works were conducted, where applicable, to meet local or state government planning approval conditions. Audits have been conducted in accordance with the requirements outlined by the NSW EPA Site Auditor Guidelines (2017); ACT Environmental Planning Policy (2009) or the NSW Government (June 2018) Independent Audit Post Approval Requirements (IEA). Selected Audit examples which include PFAS comprise the following:

**The Beaches Link and Gore Hill Freeway Connection Project** – Auditor for the construction of the project.

**Western Sydney University, Bankstown, NSW** – Auditor for the construction of Western Sydney University (required as part of SSD 9831).

**Iglu Redfern 2, Redfern, NSW** – Lead Auditor for the construction of Iglu Redfern 2 (SSD 9275).

**Cranbrook School, Bellevue Hill, NSW** – Lead Auditor for the construction of Cranbrook School (SSD 8812).

**Western Sydney University, Parramatta, NSW** – Lead Auditor for the construction of Western Sydney University (required as part of SSD 9670).

**Vopak Terminals, Port Botany NSW** – IEA For Terminal B1-B3 Port Botany (MP06-0089)

**The Brewery, Chippendale, NSW** – Auditor for the refurbishment of a heritage building (SSD 9374).

**Brookvale Health Centre, NSW Health** – State Significant Development (SSD). Statutory site audit following the remediation of former commercial/light industrial properties including a former service station. During the course of the audit USTs were removed, and continued groundwater investigation to delineate the extent of impact and risk evaluation.

**Former Pharmaceutical site, Kurnell NSW (2017 and ongoing)** – State Significant Development (SSD). Statutory audit for a 11ha property to endorse a remedial action plan and validation program to confirm the site is suitable for ongoing commercial use.

**St Leonards Medical Centre, Ramsay Healthcare (2016-2018)** – State Significant Development (SSD). Statutory site audit to confirm the former Mitsubishi vehicle maintenance facility was rendered suitable for medical commercial uses with basement car parking and open space.

**North Shore Health Hub, St Leonards (2018 and ongoing)** – SSD State Significant Development (SSD). Statutory site audit to confirm the commercial/industrial site was rendered suitable for proposed hospital expansion.

**Alexandria Park Community School (APCS) (2018 and ongoing)** – State Significant Development (SSD). Statutory site audit to confirm the site is suitable for proposed educational development (comprising childcare, primary, secondary school and community use).

**Fairvale High School, DOE (2018-current)** – State Significant Development. Statutory site audit to confirm the site is suitable for primary school use. Evaluating waste disposal, importation, environmental monitoring.

**Proposed Catherine Field, East Leppington and Wagga Wagga Primary Schools** – Specialist Audit for State Significant Developments.

**Alex Avenue Schofields, DOE (2019, 6 months)** – State Significant Development. Statutory site audit to confirm the former rural site is suitable for proposed primary school redevelopment.

**Sydney University Expansion (Project Regiment) (2017, 18 months)** – State Significant Development. Statutory site audit to confirm suitability of site for mixed use accommodation and training facility.

**Waitara Public School Redevelopment, DOE (2017, 1 year)** – State Significant Development. Statutory site audit for proposed primary school alterations and additions.

**Parramatta Square Redevelopment (2015 and ongoing)** – Site audit of Phase 3, 4, 5, 6, 7 and 8 of major mixed use precinct redevelopment.

**Molonglo Valley 3, ACT Future Urban Release (2013 and ongoing)** – multi stage site audit for 1145ha of former rural and forestry land. Historically the northern portion of the site was used for artillery live firing practices during 1914, 1920 and 1921. Molonglo Valley Stage 3 forms part of a major land release for residential expansion within the ACT. Due to the combined rural and historical military use at the site, the assessments completed required a combination of contamination as well as unexploded ordnance expertise. Site audit for site suitability and compliance to CEMP.

**Former Bonshaw Naval Receiving Station HMAS Harmon ACT (2012, 18 months)** – statutory audit to confirm the suitability of 210ha for broad acre use post demolition of receiving station, support facilities and antennae.

**East Lake Redevelopment (Griffith, Kingston and Fyshwick ACT) (2012 - current)** – 100ha of former rail and commercial/industrial land proposed for mixed use redevelopment.

**Precinct 1-4 Elara residential release for Stockland (2013 – 2016)** – multi stage statutory audit confirming the remediation of 200ha of rural residential agricultural and poultry farming land for mixed uses associated with a new residential suburb. Evaluation of waste disposal, importation, environmental controls and monitoring.

**Green Square Urban Renewal Mixed Use Residential for Mirvac (2014-2017)** – several sites requiring remediation and tank decommissioning works to enable the redevelopment for high rise residential, ground floor commercial and day care use.

**Former Royal South Sydney Hospital Site NSW, City of Sydney Council (2012, 18 months)** – multi staged audit to confirm site investigation, remediation and validation part of site for affordable housing, and endorsement of RAP for balance of site (proposed for community uses including day care centre).

**Residential Release, former Summer Hill Flour Mill (2014-2018)** – Four staged audit. Evaluation of site investigation and remediation works to confirm the former industrial manufacturing site has been remediated to a condition suitable for high rise residential with some commercial.



## NSW Site Auditor Scheme

### RENEWAL OF ACCREDITATION AS SITE AUDITOR UNDER CONTAMINATED LAND MANAGEMENT ACT 1997 (NSW)

**Auditor:** Ms Rebeka Hall                      **Accreditation No:** 0802  
**Accreditation Date:** 17 December 2018      **Period of Accreditation:** Three (3) years

The Environment Protection Authority (EPA) advises that **Ms Rebeka Hall** (the auditor) has been granted accreditation under s.51 of the *Contaminated Land Management Act 1997* (the Act) as a site auditor for a period of **three (3) years** subject to the following conditions:

1. The auditor must maintain a good knowledge of NSW legislation relating to contaminated sites and environment protection in general, including the:
  - (a) Act and any regulation made under that Act;
  - (b) other environment protection legislation (as defined by the Protection of the Environment Administration Act 1991) administered by the EPA; and
  - (c) Environmental Planning and Assessment Act 1979, and regulations and relevant environmental planning instruments made under that Act.
2. The auditor must maintain a good understanding of guidelines made or approved by the EPA under s.105 of the Act.
3. The auditor must hold insurance cover which complies with the following requirements:
  - (a) the cover applies to the occupation of site auditor and the activities to be carried out as a site auditor accredited under the Act, and
  - (b) the policy is for not less than \$5,000,000 cover for any 12 month period.
4. Within 14 days of renewing the insurance cover held for the purposes of condition 3, the auditor must forward to the EPA written confirmation from the insurer that the cover is in force and complies with the requirements of condition 3.
5. The auditor must pay an accreditation fee of \$23,676 to the EPA within one month from the date of the tax invoice.

A handwritten signature in black ink, appearing to read 'Anthea White'.

12 December 2018

**ANTHEA WHITE**  
**A/Director Contaminated Land Management**  
**Environment Protection Authority**

**Note**

- The auditor must comply with the Act and any regulation made under the Act. This includes a requirement to provide an annual return as specified under s.53D of the Act.
- The auditor's accreditation expires at the end of the accreditation period unless renewed in accordance with the Act and Regulations. The *Contaminated Land Management Regulation 2013* provides that applications for renewal must be made between 30 and 60 days before expiry of the current accreditation period.
- The EPA may suspend or revoke the auditor's accreditation in accordance with s.56 of the Act.



*The Certified Environmental Practitioner Board  
hereby attests that*

**Rebeka Hall**

*having fulfilled all the requirements of the Board  
has been registered as a*

*Certified Environmental Practitioner*

*with Registration Number*

**889**

*on the date*

**3rd of May 2017**

  
*Chairperson of the Board*





*The Certified Environmental Practitioner Board  
hereby attests that*

**Rebeka Hall**

*having fulfilled all the requirements of the Board  
has been registered as a*

*Certified Environmental Practitioner  
Contaminated Land Specialist*

*with Registration Number*

**913**

*on the date*

**3rd of May 2017**

  
*Chairperson of the Board*



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## *PwC's Auditor Training*

### Certificate of Attainment

*awarded to*

***Rebeka Hall***

## *Becoming a Skilled Lead Auditor*

Exemplar Global AU - Auditing Management Systems (ISO 19011:2018)

Exemplar Global TL - Lead Audit Teams (ISO 19011:2018)



Certificate No: 7090575-5136510

Course End Date: 21 Jun 2019

Certificate Issue Date: 27 Jun 2019



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Tom Barham

*Training Manager*



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## PROFESSIONAL SUMMARY

Cissillia has 7 years of experience working as an environmental consultant in Singapore and Australia. She has a Doctorate in Chemical Engineering. During her career as an environmental consultant, she managed budgets, data, contractors, and clients and has had experience in the petroleum sector, as well as site audits. Cissillia has been enriching her business and interpersonal skills by in data acquisition, validation, auditing and reporting. She is currently a member the Geosyntec Audit Team and is involved in site audits to meet Contaminated Land Management Act 1997 and Independent Environmental Audits to meet State Significant Development consent conditions.

## QUALIFICATIONS

*Ph.D., Chemical Engineering,  
University of New South  
Wales, 2005*

*B.Eng., Chemical Engineering  
(Hons), University of New  
South, 2001*

## SPECIALTIES

*Environmental liability  
valuation*

*Site investigation and  
characterisation*

*Compliance and Audit  
Support*

## KEY PROJECT EXPERIENCE

### Independent Environmental Audits

**Rumba Lara development, Gosford, NSW** – Support Auditor for the construction of Rumba Lara residential development (required as part of SSD 10321).

**Holt Kurnell, NSW** – Support Auditor for the operation of a landfill facility at Kurnell.

**Western Sydney University, Bankstown, NSW** – Support Auditor for the construction of Western Sydney University (required as part of SSD 9831).

**Roseville College** – Auditor in training for the construction of Roseville College (required as part of SSD 9912).

**The Brewery, Chippendale, NSW** – Auditor in training for the refurbishment of a heritage building (required as part of SSD 9374).

### Audits

**Molonglo 132kV Relocation Project, Molonglo, ACT** – Audit assistance on review of Contaminant Management Plans (CMPs) for transmission line upgrade works by Zinfra and Woden Contractors Pty Ltd (Wodens).

**The Concord Hospital, Concord, NSW** – Audit assistance on the redevelopment of the Concord Hospital.

**City of Parramatta Square, Parramatta, NSW** – Audit assistance on the redevelopment of Parramatta Square Town Hall.

**Gamuda Australia, M12, NSW** – Audit assistance on the construction of the Westmead Metro Station.

### Environmental Assessments

**CALTEX** – Environmental assessments and project management, proposal and quotation, management and coordination of contractor, client, and government agencies, data analysis and report, permit application, regulatory compliance, and pollution control studies.

**SHELL** – Environmental assessments and project management, proposal and quotation, management and coordination of contractor, client, and government agencies, data analysis and report, permit application, regulatory compliance, and pollution control studies.

**BOC Gases** – Environmental assessments and project management, proposal and quotation, management and coordination of contractor, client, and government agencies, data analysis and report, permit application, regulatory compliance, and pollution control studies.

**Abacus** – Phase 1 Environmental Assessment, Croydon.

**Abacus** – Phase 1 Environmental Assessment, Leumeah.

**Abacus** – Phase 1 Environmental Assessment, Kirrawee.

## **CONFERENCES AND EXHIBITIONS**

### **Hydrogen and Fuel Cell Fair (Hannover Fair), Germany**

- Formulated and implemented strategies for good public relations.
- Support tradeshow ambassadors and VIP visitors during the fair.

### **1<sup>st</sup> World Hydrogen Technology Convention, Singapore**

- Business to business marketing campaign and increased the net profit by 20%.
- Designed and planned exhibition floor (operational management).

### **PhD**

- Design and conduct scientific experiments to understand the degradation of environmental pollutants from drycleaners using advanced oxidation technology (AOT).
- 3 Conferences and 2 scientific journal publications.



## PROFESSIONAL SUMMARY

Fiona is an experienced Senior Environmental Engineer. In her 15-year career in the industry she has worked on a broad range of site assessment and remediation projects in Australia and the United Kingdom. Always keen to explore new solutions for clients, she has a flexible and proactive approach to problem solving. Fiona thrives on the challenge and diversity of her role.

Fiona has extensive experience in managing combined geotechnical and contaminated land projects, infrastructure and urban development projects, landfill investigations, remediation assessments and contaminated site audits.

## MEMBERSHIPS AND TRAINING

- Member of Institute of Engineers Australia
- Member of Australian Land and Groundwater Association (Committee Member 2014-2015)
- WorkCover OHS General Induction for Construction Work in NSW (White Card)
- Senior First Aid
- ACLCA NSW Short Course on Landfill Gas Investigation (November 2012)
- ALGA A-Z Ground Gas Workshop (March 2017)

## QUALIFICATIONS

*B.E. (Hons), Environmental,  
University of New South  
Wales*

*Master of Environmental  
Management, University of  
New South Wales*

## SPECIALTIES

*Project Management*

*Site Investigation*

*Remediation and Validation*

*Contaminated Land Auditing*

*Landfill Investigations and  
Remediation*

*Hazardous Gas Investigation,  
Risk Assessment and  
Remediation*

*Sediment Assessment*

## KEY PROJECT EXPERIENCE

### Audits

**New Breeze Stages 2 and 3 Development, Bardia:** Statutory site audit of assessment, remediation and validation works undertaken at the former Ingleburn Defence Site where infantry training camps for World War II were constructed. Other defence related activities including artillery, engineers, transport, signals, medical and ordnance corps also used the IDS during this period. The majority of the activities within the IDS ceased before 2000. Due to the historical military use at the site, the assessments completed required a combination of contamination (including PFAS assessment) as well as unexploded ordnance expertise. The end use for the site following remediation is low density residential development and recreational open space. The scope of audit involved assessment of the adequacy of the Remediation Action Plans (RAP), Unexploded Ordnance Clearance (UXO), Imported Fill Protocol (IFP), Unexpected Finds Clearance Report and Validation reports for each completed earthworks zone. Various stakeholder engagement was required during this Audit, including project manager, environmental consultants, UXO consultants and civil contractors.

**Industrial Waste Recycling and Treatment Facility, Western Sydney:** Statutory site audit of investigation works at a waste recycling and treatment facility in western Sydney, of which the site has been declared to be a significantly contaminated land under the CLM Act. The site has been operating as a waste treatment facility and solvent recycling operation under an Environment Protection Licence issued by NSW EPA for at least 30 years. Whilst solvent treatment is the main operation at the site, PFAS is also being identified as a contaminant of concern in the underlying groundwater system in parts of the site. The scope of audit involved assessment of adequacy of sampling and analysis plan, investigation and delineation assessment, remedial option assessment and remedial action plan. The audit was required to fulfil the requirement of a voluntary management proposal.

**Former Sydney Water Waterloo Depot, Waterloo:** Providing audit assistance on a statutory audit of data gap investigation and remediation action plan evaluation for the former Sydney Water Waterloo Depot which is affected by the groundwater contamination originated from the adjacent Lawrence Dry Cleaning facility. The dry cleaning facility, together with the site and other adjoining properties, were declared as a remediation site by the NSW EPA which is managed under a Management Order. The main scope of the audit is to assess the implication of the groundwater contamination for the proposed high density residential development.

**North Shore Health Hub, St Leonards:** Statutory audit of contamination assessment and remediation works conducted at a former warehouse facility located within the St Leonards industrial area as required under a State Significant Development consent. Preferred remediation approach included a combination of asbestos fill capping and offsite disposal, with the capped area be managed with a long term environmental management plan. The health hub will form part of the North Shore Private Hospital precinct.

**Woolworths Tuggeranong Service Station, Canberra:** Statutory audit of contamination assessment and remediation works conducted at an operational service station located in Tuggeranong, Canberra ACT. The site has been listed on the ACT Register of Contaminated Sites as a result of the groundwater contamination being identified at the site. The scope of the audit involved assessment of adequacy of data gap investigation, soil validation report for the retanking program, delineation assessment, remediation action plan and groundwater modelling.

**Penrith Central Park development, Penrith:** Non-statutory audit of contamination assessment and remediation action plan conducted at the proposed Penrith Central Park development. A former dry cleaner was operated within the site where chlorinated hydrocarbon groundwater contamination has been identified.

**Proposed primary school developments, Sydney metropolitan area:** Non-statutory and statutory audits of contamination assessment conducted at three new or existing school sites in Schofields, Jordan Springs and Waitara. The scope of the audits involved review of contamination reports and waste documentation as required under planning approvals.

**Former Ettamogah Army Depot, Ettamogah:** Non-statutory audit of contamination assessment and remediation works conducted at the former army depot located at Ettamogah, north of Albury that is proposed for redevelopment. The site covers an area of about 110Ha and has been ammunitions depot from 1940s to 1980s. There is evidence of widespread disposal of explosive ordnance wastes by burial, potentially including UXO. This scope of the audit included the assessment of implications of contamination (both chemical and UXO) for all potential future beneficial uses; including where appropriate outlining the implications of particular contamination issues on site suitability for the range of land uses under consideration.

**Eastern Industrial Estate, Fyshwick:** Statutory site audit of the former Canberra Abattoir site. The site was broken into sectors for staged development and audit. The audits were required as part of planning approvals for proposed commercial/industrial redevelopment of the site.

### Due Diligence Assessment

**Former Industrial Property, Newcastle Area:** Managed a soil and groundwater assessment for a property currently regulated by the NSW EPA under a Voluntary Investigation Proposal. Currently coordinating a data gap investigation to facilitate the formulation of remedial action plan following the completion of property transaction. Duties included preparation of sampling and analysis plan and contamination assessment.

**Multiple Sites, Western Sydney Parklands Trust, Western Sydney:** Conducted Preliminary Site Investigations on multiple sites across the Western Sydney area as part of divestment program.

**Multiple Sites, TAFE NSW:** Conducted Preliminary Site Investigations on multiple sites across NSW as part of pre-acquisition or divestment programs.

**Multiple Sites, Roads and Maritime Services, Sydney:** Conducted preliminary site investigations for various commercial and industrial properties within the Sydney Metropolitan Areas for due diligence purposes.

**Former Pump Manufacturing Facility, Northern Beach Area:** Managed a due diligence contamination assessment for a pump manufacturing facility as part of property transaction process.

**Various Multinational Petroleum Companies, Multiple Sites, NSW:** Undertook environmental site assessments and validation assessments for over 80 petroleum service stations, depots and fuel terminals across NSW as part of site divestment programs.

## Attachment B – Declaration

## Independent Audit Declaration Form

Project Name	Remondis Tomago Resource Recovery
Consent Number	SSD 10447
Description of Project	Operation of Resource Recovery Facility. Site is to process up to 98,201 tonnes per annum of solid and liquid waste from municipal, commercial, industrial and construction sources for reuse and recycling
Project Address	21D and 21F School Drive, Tomago NSW 2322
Proponent	Remondis Australia Pty Ltd
Title of Audit	Independent Environmental Audit of the Remondis Tomago Resource Recovery
Date	28 April 2023

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Lead Auditor (Alternate) Rebeka Hall

Signature



Qualifications

- Exemplar Global AU (ISO 19011:2018) (No. 7090575-5136510)
- NSW EPA Accredited Site Auditor (under Contaminated Land Management Act) (No. 0802)
- Certified Environmental Practitioner (General) EIANZ (No. 889)
- Certified Environmental Practitioner (Site Contamination Specialist) EIANZ (No. SC40913)
- BEnvSc (Hons) (Geology)

Name of Lead Auditor Cheryl Halim

Signature



Qualifications

- Exemplar Global AU (ISO 19011:2018) (No. 11280933-7383767)

	<ul style="list-style-type: none"> <li>• NSW EPA Accredited Site Auditor (under Contaminated Land Management Act) (No. 2201)</li> <li>• BE (Chemical)</li> <li>• PhD (Chemical Engineering)</li> </ul>
Name of Support Auditor	Cissillia Young
Signature	
Qualifications	<ul style="list-style-type: none"> <li>• BE (Chemical)</li> <li>• PhD (Chemical Engineering)</li> </ul>
Name of Support Auditor	Fiona Wong
Signature	
Qualifications	<ul style="list-style-type: none"> <li>• B.E. (Hons), Environmental, University of New South Wales</li> <li>• Master of Environmental Management, University of New South Wales</li> </ul>
Company	<b>Geosyntec Consultants Pty Ltd</b>

Department of Planning and Environment

Rachael Mulholland  
Environment and Sustainability Advisor  
REMONDIS Australia Pty Ltd  
LEVEL 4 163 O'RIORDAN STREET  
MASCOT New South Wales 2020

13/06/2023

Dear Ms Mulholland

**Remondis Resource Recovery Facility Tomago (SSD-10447)  
Auditor Endorsement Request**

I refer to the request (SSD-10447-PA-20) for the Secretary's endorsement of suitably qualified persons submitted by Remondis Australia Pty Ltd (Remondis) to prepare the 2023 Remondis Resource Recovery Facility (the project) Independent Environmental Audit (IEA) report as required by Conditions C16 and C17 of SSD 10447 (the consent).

The Department of Planning and Environment (the department) has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise, in accordance with Condition C16 of the consent and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team:

- Cheryl Halim – Lead Auditor
- Rebeka Hall – Alternate Lead Auditor
- Fiona Wong – Support Auditor
- Cissillia Young – Support Auditor

Please ensure this correspondence is appended to the IEA Report.

The IEA report must be prepared, undertaken and finalised in accordance with the conditions of the consent and the Independent Audit Post Approval Requirements (2020). Failure to meet these requirements will require revision and resubmission.

The department understands from correspondence with Remondis that the project commenced on 15 August 2022. As such, in accordance with Condition C16 of the consent, the IEA report and Response to Auditor Recommendations are due to be submitted to the department for review by **15 November 2023**.

Should you wish to discuss the matter further, please contact James Epstein, Senior Compliance Officer, on (02) 6575 3419 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



Heidi Watters  
Team Leader Northern  
Compliance

As nominee of the Planning Secretary

## Cissillia Young

---

**From:** Cheryl Halim  
**Sent:** Wednesday, 14 June 2023 12:25 PM  
**To:** compliance@planning.nsw.gov.au  
**Cc:** Cissillia Young  
**Subject:** Consultation for Remondis Tomago SSD10447  
**Attachments:** AU122283 L2 14Jun23 Consultation with DPE Remondis Tomago SSD10447.pdf

Dear Ms Heidi Watters,

Thank you for providing approval of the audit team for the Remondis Resource Recovery Facility at Tomago.

Please find attached our consultation letter, as required by the Independent Audit Post Approval Requirements. Please let us know if there are any items you would like us to include for the audit, which has been scheduled next month.

Please don't hesitate to contact Cissillia or myself if you have any questions. Thank you.

Kind Regards,

**Dr Cheryl Halim**  
**Principal Environmental Engineer**

### **Geosyntec Consultants Pty Ltd**

A: Suite 3.04, 1 York Street, Sydney NSW 2000  
P: +61 (2) 9251 8070  
M: +61 430 013 246

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AU122283 L2 14Jun23 Consultation with DPE Remondis Tomago SSD10447

14 June 2023

Department of Planning and Environment

Via Project Portal

Dear Sir/Madam,

**Re: Independent Environmental Audit, 21D and 21F School Drive Tomago NSW 2322**

Geosyntec Consultants Pty Ltd (Geosyntec) has been engaged by Remondis Australia Pty Ltd (Remondis) to conduct an Operational Independent Environmental Audit project for 21D and 21F School Drive Tomago NSW 2322 ('the site'). The site is listed as Lot 8 and 11 DP 270328 and Part Lot 301 DP 634536.

The Independent Environmental Audit is conducted to meet Conditions C16 and C17 of State Significant Development (SSD) No. 10447, which state:

Within one year of the commencement of operation of the development, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must:

- C16
- a. be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020)
  - b. be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and
  - c. be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary).

---

In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must:

- C17
- a. review and respond to each Independent Audit Report prepared under condition C16 of this consent;
  - b. submit the response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations;
  - c. implement the recommendations to the satisfaction of the Planning Secretary; and
  - d. make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before this is done.
- 

The Independent Environmental Audit will be conducted in accordance with the NSW Government Independent Audit Post Approval May (June 2020) (IAPAR 2020).

The proposed audit team includes Cheryl Halim as Lead Auditor, Rebeka Hall as alternate Lead Auditor assisted by Fiona Wong, and Cissillia Young as Support Auditors. The Audit Team has been approved by a DPE letter dated 13 June 2023 (attached in Attachment A). The Audit has been tentatively booked for 10<sup>th</sup> July 2023, noting that Remondis is still waiting for approval for the proposed team.

As required by the IAPAR (2020), we need to conduct consultation with DPE and other agencies. Can DPE please provide any items that need to be included as part of our Audit?

Should you have any queries or wish to discuss any points, please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Cheryl Halim', with a horizontal line extending to the right.

**Cheryl Halim**  
**Independent Environmental Auditor/**  
**Exemplar Global AU (ISO 19011:2018)**  
**(No. 11280933-7383767)**  
Geosyntec Consultants Pty Ltd

Attachments: Attachment A – Auditor Approval

## Attachment A – Auditor Approval

Department of Planning and Environment

Rachael Mulholland  
Environment and Sustainability Advisor  
REMONDIS Australia Pty Ltd  
LEVEL 4 163 O'RIORDAN STREET  
MASCOT New South Wales 2020

13/06/2023

Dear Ms Mulholland

**Remondis Resource Recovery Facility Tomago (SSD-10447)  
Auditor Endorsement Request**

I refer to the request (SSD-10447-PA-20) for the Secretary's endorsement of suitably qualified persons submitted by Remondis Australia Pty Ltd (Remondis) to prepare the 2023 Remondis Resource Recovery Facility (the project) Independent Environmental Audit (IEA) report as required by Conditions C16 and C17 of SSD 10447 (the consent).

The Department of Planning and Environment (the department) has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise, in accordance with Condition C16 of the consent and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team:

- Cheryl Halim – Lead Auditor
- Rebeka Hall – Alternate Lead Auditor
- Fiona Wong – Support Auditor
- Cissillia Young – Support Auditor

Please ensure this correspondence is appended to the IEA Report.

The IEA report must be prepared, undertaken and finalised in accordance with the conditions of the consent and the Independent Audit Post Approval Requirements (2020). Failure to meet these requirements will require revision and resubmission.

The department understands from correspondence with Remondis that the project commenced on 15 August 2022. As such, in accordance with Condition C16 of the consent, the IEA report and Response to Auditor Recommendations are due to be submitted to the department for review by **15 November 2023**.

Should you wish to discuss the matter further, please contact James Epstein, Senior Compliance Officer, on (02) 6575 3419 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



Heidi Watters  
Team Leader Northern  
Compliance

As nominee of the Planning Secretary

**From:** [Cissillia Young](#)  
**To:** [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)  
**Cc:** [Cheryl Halim](#)  
**Subject:** 2023 Operational IEA consultation with EPA - 21D and 21F School Drive Tomago NSW 2322 (Remondis Australia Pty Ltd) - SSD 10447  
**Date:** Monday, 5 June 2023 12:10:00 PM

---

Dear Sir/Madam,

Geosyntec Consultants Pty Ltd (Geosyntec) has been engaged by Remondis Australia Pty Ltd (Remondis) to conduct an operational independent environmental audit (IEA) for 21D and 21F School Drive Tomago NSW 2322.

The State Significant Development (SSD) (SSD No. 10447) consent issued by the Department of Planning and Environment (DPE) requires the audit to be conducted in accordance with the requirements outlined in the Independent Audit Post Approval Requirements (2020).

The Independent Audit PAR (2020) requires the Auditor to consult with key stakeholders.

Please advise if **EPA** has any comments/concerns regarding environmental issues relating to the project that you would like us to consider as part of the first independent audit. The first audit has been scheduled to take place on 10 July 2023.

Please do not hesitate to contact us if you have any questions. We look forward to receiving your response. Thank you.

Sent on behalf of the Lead Auditor Cheryl Halim.

Kind Regards,

**Cissillia Young**  
Environmental Engineer

**Geosyntec Consultants Pty Ltd**

A: Suite 3.04, Level 3, 1 York Street, Sydney NSW 2000  
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DOC23/491211-2, EF21/18692

Geosyntec Consultants Pty Ltd

By email: [cissillia.young@geosyntec.com](mailto:cissillia.young@geosyntec.com)

9 June 2023

Attention: Ms Cissillia Young

Dear Ms Young

### **Remondis Australia Pty Ltd - Independent Environmental Audit**

I refer to your email dated 5 June 2023 regarding input to the Independent Environmental Audit of Remondis Australia Pty Ltd Tomago Resource Recovery Facility and Depot at 21D and 21F School Drive Tomago.

The Environment Protection Authority (EPA) encourages independent audit towards proponents improving their environmental performance. We do not provide input as our role is to set environmental objectives for environmental/conservation management and manage outcomes.

I refer you to the EPA's public register <http://www.epa.nsw.gov.au/prpoeo/index.htm> where you can search for regulatory activity undertaken by the EPA for Environment Protection Licence 21636 for Remondis Australia Pty Ltd Tomago Resource Recovery Facility and Depot at 21D and 21F School Drive Tomago.

If you require any further information regarding this matter please me on (02) 4908 6833.

Yours sincerely

**NATASHA RYAN**  
**Unit Head - Regulatory Operations**

## Cissillia Young

---

**From:** Cissillia Young  
**Sent:** Monday, 5 June 2023 12:10 PM  
**To:** Council@portstephens.nsw.gov.au  
**Cc:** Cheryl Halim  
**Subject:** 2023 Operational IEA consultation with Council - 21D and 21F School Drive Tomago NSW 2322 (Remondis Australia Pty Ltd) - SSD 10447

Dear Sir/Madam,

Geosyntec Consultants Pty Ltd (Geosyntec) has been engaged by Remondis Australia Pty Ltd (Remondis) to conduct an operational independent environmental audit (IEA) for 21D and 21F School Drive Tomago NSW 2322.

The State Significant Development (SSD) (SSD No. 10447) consent issued by the Department of Planning and Environment (DPE) requires the audit to be conducted in accordance with the requirements outlined in the Independent Audit Post Approval Requirements (2020).

The Independent Audit PAR (2020) requires the Auditor to consult with key stakeholders.

Please advise if **Council** has any comments/concerns regarding environmental issues relating to the project that you would like us to consider as part of the first independent audit.  
The first audit has been scheduled to take place on 10 July 2023.

Please do not hesitate to contact us if you have any questions.  
We look forward to receiving your response. Thank you.

Sent on behalf of the Lead Auditor Cheryl Halim.

Kind Regards,

**Cissillia Young**  
**Environmental Engineer**

### **Geosyntec Consultants Pty Ltd**

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## Appendix D Record of Meeting and Agenda

AU122283 L4 7Jul23 Opening meeting agenda

## Independent Environmental Audit – Opening Meeting Agenda

**Site:** Remondis Tomago - 21D and 21F School Drive Tomago NSW 2322

**SSD:** SSD No. 10447

**Date & Time:** 10 July 2023, 9-10 AM

### Invitees:

Cheryl Halim (Geosyntec)	Fiona Wong (Geosyntec)	Steven Hassett (Remondis)
Rachael Mulholland (Remondis)	Susie McBurney (Remondis)	Phillip Walmsley (Remondis)
Monique Hocking (Remondis)	Glen Barnett (Remondis)	Paul Grime (Remondis)
Elizabeth Leahy (Remondis)	Conor Flynn (Remondis)	

## AGENDA

1. Introductions
  - a. Participants and Roles
  - b. Purpose and Objective of Audit
  - c. Scope of Audit (boundary, activities, processes)
  - d. Criteria for Audit (SSD Conditions, CEMP commitments)
2. Audit Methodology
  - a. Timing – site based/desktop based
  - b. Evidence based (record and observation)
  - c. Recording of observations (notes, photographs, discussions)
  - d. Any site limitation, cultural, religious or social sensitivities
  - e. Additional Audit requirements from Agency Consultation
  - f. Notification from DPIE or other agencies
  - g. Complaints
  - h. Incidents
3. Reporting
  - a. Method (at time of observation, closing meeting (recap, formal report)
  - b. Grading – Compliant, Non-Compliant, Not Triggered, Recommendations
  - c. Post Audit opportunity to respond prior to Final Report
4. Close out meeting – timing via Teams or email

## Independent Environmental Audit – Attendance Sheet

Name	Position & Company	Signature
Steven Hassett	Senior HSEQ Advisor	Matt
Rachel Mulholland	Env and Sustainability Advisor	Rachel Mulholland
Elizabeth Leahy	Project Manager	Leahy
Phil Walmsley	Ops Manager	Phil
Cheryl Halim	Auditor, Geosyntec	Cheryl Halim
Fiona Wong	Auditor, Geosyntec	Fiona Wong

**From:** [Cheryl Halim](#)  
**To:** [Cissillia Young](#)  
**Subject:** AU122283 Remondis Tomago IEA Closing Meeting  
**Date:** Friday, 15 September 2023 2:12:02 PM  
**Attachments:** [Tomago Appendix F - Audit Table.xlsx](#)

---

Dear all,

Thank you to Remondis Tomago for attending our Opening Meeting for the initial IEA on and site visit on Monday 10 July 2023. We also appreciate receiving project records prior to the Audit, which expedites the audit process.

## **1. Background and Objective of Email**

During the site visit, we observed environmental management and conducted interviews with key Remondis representatives regarding site practices. We also completed a review of the information provided by Remondis against the IEA Audit Table.

As discussed onsite, the compliance status is evaluated as follows:

- Compliant
- Non-compliant
- Non-triggered

The purpose of this email is to provide an overview of our findings, and a request for additional information to address outstanding items.

Please treat this email as the Closing Meeting for the initial IEA.

## **2. Status of Review and Timing**

The status of our Audit Table is attached. Outstanding items are flagged in yellow, and we request additional information (if available) from Remondis.

The Draft Report will be sent to Remondis by approximately September 2023, or earlier if all information can be closed out beforehand.

Remondis will have an opportunity to provide additional information and rectify any potential non-compliances within a week of issue of the Draft report, after which we will issue our final report.

## **3. Identified Strengths**

Remondis has a very organised system and robust record keeping, which greatly assisted our audit. During the site audit, it was demonstrated that Remondis has proactive approach to environmental management and is amenable to suggestions on improvement.

## **4. Potential non-compliances and opportunities for improvement**

We have not identified a non-compliance yet, however, there are a number of things that are still outstanding, as highlighted in yellow in the attached Audit Table.

We seek a response to the items above by mid September 2023 (preferably earlier).

We have also identified the following opportunities for improvement, which will be documented as recommendations in the Audit Table:

- G109: If there is uncertainty on whether an incident requires notification to DPE, it would be prudent to notify this to DPE. Notification must be conducted in writing in accordance with the consent conditions. All incidents that require notification to EPA will need to be notified to DPE.

G173: Time of sampling should be included in the groundwater monitoring report in future sampling event.

## **5. Outstanding Items in Audit Table**

See attached table. Please provide before mid September 2023 (preferably earlier).



Please don't hesitate to contact us if you have any questions.

Kind Regards,

**Dr Cheryl Halim**  
Principal Environmental Engineer

### **Geosyntec Consultants Pty Ltd**

A: Suite 3.04, 1 York Street, Sydney NSW 2000

P: +61 (2) 9251 8070

M: +61 430 013 246

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## Appendix E Photographs

## Photograph Log

**Client Name:**

Remondis

**Site Location:**

21D and 21F School Drive  
Tomago, NSW

**Project Number:**

AU122283

<p>Photo Number: G34, G35, G37, G113</p>	<p>Date: 10/7/2023</p>	 
<p>Description:</p> <p>Waste types observed onsite.</p> <p>All waste was observed to be stored within buildings</p> <p>Baled material did not exceed 4m high.</p>		

## Photograph Log

**Client Name:**

Remondis

**Site Location:**

21D and 21F School Drive  
Tomago, NSW

**Project Number:**

AU122283

<p>Photo Number: G34, G35, G37, G113 (cont.)</p>	<p>Date: 10/7/2023</p>	
<p>Description:</p> <p>Waste types observed onsite.</p> <p>All waste was observed to be stored within buildings.</p>		 

## Photograph Log

**Client Name:**

Remondis

**Site Location:**

21D and 21F School Drive  
Tomago, NSW

**Project Number:**

AU122283

<p>Photo Number: G34, G35, G37, G113 (cont.)</p>	<p>Date: 10/7/2023</p>	  
<p><b>Description:</b></p> <p>Waste types observed onsite.</p> <p>All waste was observed to be stored within buildings.</p>		

## Photograph Log

**Client Name:**

Remondis

**Site Location:**

21D and 21F School Drive  
Tomago, NSW

**Project Number:**

AU122283

<p>Photo Number: G34, G35, G37, G113 (cont.)</p>	<p>Date: 10/7/2023</p>	
<p>Description:</p> <p>Waste types observed onsite.</p> <p>All waste was observed to be stored within buildings.</p> <p>Baled material did not exceed 4m high.</p>		

## Photograph Log

**Client Name:**

Remondis

**Site Location:**

21D and 21F School Drive  
Tomago, NSW

**Project Number:**

AU122283

<p>Photo Number: G69, G70</p>	<p>Date: 10/7/2023</p>	
<p>Description:  Adequate parking was observed.  No vehicle was observed to be queuing on the public road.</p>		

## Photograph Log

**Client Name:**

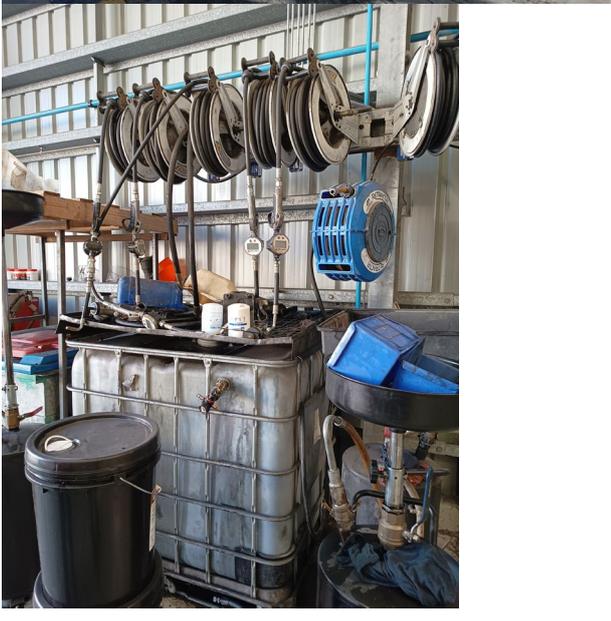
Remondis

**Site Location:**

21D and 21F School Drive  
Tomago, NSW

**Project Number:**

AU122283

<p>Photo Number: G76</p>	<p>Date: 10/7/2023</p>	
<p><b>Description:</b></p> <p>Chemicals were observed to be stored in paved areas.</p> <p>Bunding was observed in the majority of the containers.</p> <p>Spill kits were observed.</p> <p>The workshop was observed to be paved, with no drain observed. Paving was observed to be in good condition.</p>		
		

## Photograph Log

**Client Name:**

Remondis

**Site Location:**

21D and 21F School Drive  
Tomago, NSW

**Project Number:**

AU122283

<p>Photo Number: G76</p>	<p>Date: 10/7/2023</p>	
<p><b>Description:</b></p> <p>Chemicals were observed to be stored in paved areas.</p> <p>Bunding was observed in the majority of the containers.</p> <p>Spill kits were observed.</p> <p>The workshop was observed to be paved, with no drain observed. Paving was observed to be in good condition.</p>		

## Photograph Log

**Client Name:**

Remondis

**Site Location:**

21D and 21F School Drive  
Tomago, NSW

**Project Number:**

AU122283

<p>Photo Number: G76</p>	<p>Date: 10/7/2023</p>	
<p><b>Description:</b></p> <p>Chemicals were observed to be stored in paved areas.</p> <p>Bunding was observed in the majority of the containers. At the time of site inspection, some of the taps were located outside the bunds. These were rectified after the site inspection (see second photograph).</p> <p>Spill kits were observed.</p> <p>The workshop was observed to be paved, with no drain observed. Paving was observed to be in good condition.</p>		

## Photograph Log

**Client Name:**

Remondis

**Site Location:**

21D and 21F School Drive  
Tomago, NSW

**Project Number:**

AU122283

<p>Photo Number: G76</p>	<p>Date: 10/7/2023</p>		
<p><b>Description:</b></p> <p>Chemicals were observed to be stored in paved areas.</p> <p>Bunding was observed in the majority of the containers.</p> <p>Spill kits were observed.</p> <p>The workshop was observed to be paved, with no drain observed. Paving was observed to be in good condition.</p>			

## Photograph Log

**Client Name:**

Remondis

**Site Location:**

21D and 21F School Drive  
Tomago, NSW

**Project Number:**

AU122283

<p>Photo Number: G76</p>	<p>Date: 10/7/2023</p>	 
<p><b>Description:</b></p> <p>Chemicals were observed to be stored in paved areas.</p> <p>Bunding was observed in the majority of the containers.</p> <p>Spill kits were observed.</p> <p>The workshop was observed to be paved, with no drain observed. Paving was observed to be in good condition.</p> <p>Diesel tank label indicates compliance with AS 1692-2006 and AS1657-1992 and AS1940-2017 UL 142 &amp; ULC-S601.</p>		

## Photograph Log

**Client Name:**

Remondis

**Site Location:**

21D and 21F School Drive  
Tomago, NSW

**Project Number:**

AU122283

<p>Photo Number: G160</p>	<p>Date: 10/7/2023</p>	
<p>Description: Trucks parked near the gate had the loads covered.</p>		

## Appendix F Audit Table

Geosyntec ID	Document	SSD Condition / EPL or Management Plan	Item	Condition	Record / Observation	Evidence Collected / Observations	Independent Audit Findings and Recommendations	Compliance Status		
								Compliant	Non-Compliant	Not Triggered
<b>Part A Administrative Conditions</b>										
G1	SSD10447	A1	Obligation to minimise harm to the environment	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	Record	The Auditor has reviewed the performance measures and criteria in this consent and consider that reasonable and feasible measures have been implemented to prevent or minimise any material harm to the environment. Individual findings are reported in each condition below.				
G2	SSD10447	A2	Terms of consent	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) in accordance with the EIS and RTS; (d) in accordance with the Development Layout in Appendix 1; and (e) in accordance with the management and mitigation measures in Appendix 2.	Record	The development is carried out in compliance with most conditions of consent. A few non-compliances are noted in the respective Conditions below.				
					Record	10/07/2023: Interview: - Remondis (RM and EL) stated that there is no written direction from the Planning Secretary.				
					Record	The development is carried out in general accordance with the SSD, EIS and RTS.				
					Record	10/07/2023: Observation: - Development was conducted in general accordance with the Development Layout in Appendix 1.				
					Record	10/07/2023: - Assessed below in Items G113 and G125 as compliant.				
G3	SSD10447	A3	Terms of consent	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).	Record	10/07/2023: Interview: - Remondis (RM and EL) stated that there is no other written direction other than any other items already covered in this SSD consent.				
					Record	10/07/2023: Interview: - Remondis (RM and EL) stated that there is no other written direction other than any other items already covered in this SSD consent.				
G4	SSD10447	A4	Terms of consent	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(e). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), or A2(e), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Record	10/07/2023: Interview: - Remondis (RM and EL) stated that no inconsistencies, ambiguities or conflicts between them and a document listed in condition A2(c) or A2(e)				
G5	SSD10447	A5	Limits of consent: Lapsing	This consent lapses five years after the date from which it operates, unless the development has physically commenced on the land to which the consent applies before that date.	Record	10/07/2023: Interview: - Remondis (RM and EL) confirmed that the consent is still current.				
G6	SSD10447	A6	Limits of consent: Throughput	The Applicant shall not receive more than a total of 98,201 tonnes per year of wastes on site for waste processing.	Record	10/07/2023: Record Sighted: - Tomago weighbridge record for FY22/23 notes that total tonnage received in this period is 27,314.06 tonnes.				
G7 See also G149	SSD10447	A7	Limits of consent: Throughput	The Applicant must only receive the types of wastes detailed in the Waste Minimisation and Management Plan, prepared by Jackson Environment and Planning and dated 12 August 2021.	Record	10/07/2023: Record sighted: - Weighbridge record through Clearweigh for June 2023, which indicated the following waste streams were received and disposed of: cages, ferrous iron or steel, food and garden, glass, mixed hydrocarbon, mixed waste, Nespresso reject, Nespresso cage, non-ferrous metals, oil, paper or cardboard, plastic, plastic film, timber pallets.  (See also G149 which list the same requirement).				
G8	SSD10447	A8	Notification of commencement	The date of commencement of each of the following phases of the development must be notified to the Planning Secretary in writing, at least one month before that date, or as otherwise agreed with the Planning Secretary: (a) construction; (b) operation; (c) cessation of operations; and (d) decommissioning.	Record	10/07/2023: Record sighted: - DPE letter (5 November 2021) states "The Department acknowledges receipt of the notification and the intention to commence construction on 2 December 2021."				
					Record	10/07/2023: Record sighted: - DPE letter (7 February 2022) states "The Department has reviewed the document and acknowledges that Remondis intends to commence operations at the Tomago Resource Recovery Facility on 2 March 2022."  - Newcert (1 June 2022) Occupation Certificate 21-057-OC1 - Newcert (3 August 2022) Occupation Certificate 21-057-OC2				
					Record	10/07/2023: not applicable - still operational				
					Record	10/07/2023: not applicable - still operational				
G9	SSD10447	A9	Notification of commencement	If the construction or operation or decommissioning of the development is to be staged, the Planning Secretary must be notified in writing, at least one month before the commencement of each stage (or other timeframe agreed with the Planning Secretary), of the date of commencement and the development to be carried out in that stage.	Record	The construction, decommissioning or development was not staged.				
G10	SSD10447	A10	Surrender of existing consents or approvals	Within 12 months of the date of commencement of development to which this consent applies, or within another timeframe agreed by the Planning Secretary, the Applicant must surrender the development consent MP 10_0039 for an aluminium and rod conductor manufacturing plant on the site in accordance with the EP&A Regulation.	Record	10/07/2023: Record sighted: - SSD (12 October 2022) - DPE (15 November 2022) Surrender Letter (Remondis Resource Recovery Facility Tomago – (SSD-10447). Surrender of Development Consent MP10_0039 – Condition A10). The letter states that the surrender of MP10_0039 is effective from 26 September 2022				
G11	SSD10447	A11	Surrender of existing consents or approvals	Upon the commencement of development to which this consent applies, and before the surrender of existing development consents or project approvals required under condition A10, the conditions of this consent prevail to the extent of any inconsistency with the conditions of those consents or approvals. <i>Note: This requirement does not extend to the surrender of construction and occupation certificates for existing and proposed building works under Part 6 of the EP&amp;A Act. The surrender should not be understood as implying that works legally constructed under a valid consent or approval can no longer be legally maintained or used.</i>	Record	Condition noted, noting that the conditions of this consent prevails.				

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G12	SSD10447	A12	Evidence of consultation	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and  (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and  (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	Record   Record  Record	10/07/2023: Record sighted: a. Conditions of this consent that require consultation with an identified party are Conditions B8, B26, B35, and B50. The following documents were prepared in consultation with the relevant agencies: - Condition B8 - Energy from Waste Management Plan (EWMP) document and the proof of consultation with EPA. Energy from Waste has not commenced. EPA will be consulted in due course. - Condition B26 - Tomago Resource Recovery Facility and Truck Parking Depot Water Management Plan and the document takes into account EPL 21636 and Council's Development Control Plan (DCP) (PSC, 2014) requirements. - Condition B35 is not triggered in the Operational phase as this is a requirement prior to the commencement of construction. - Condition B50 - Fire engineering brief consultation with FRNSW (email from FRNSW dated 7 April 2020 with a list of concern, this was addressed and acknowledged by FRNSW on 15 April 2020)  b. Details of consultation discussed in the review of the above conditions. Additionally, stakeholder consultation was conducted by the Auditor and is documented within the main part of the report.				
G13	SSD10447	A13	Staging, combining and updating strategies, plans or programs	With the approval of the Planning Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);  (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and  (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	Record  Record  Record	10/07/2023: Interview: Remondis (RM and EL) stated project is not staged.  10/07/2023: Interview: Remondis (RM and EL) stated project is not staged.  10/07/2023: Interview: Remondis (RM and EL) stated project is not staged.				
G14	SSD10447	A14	Staging, combining and updating strategies, plans or programs	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Record	10/07/2023: Interview: Remondis (RM and EL) stated project is not staged.				
G15	SSD10447	A15	Staging, combining and updating strategies, plans or programs	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Record	10/07/2023: Interview: Remondis (RM and EL) stated project is not staged.				
G16	SSD10447	A16	Protection of public infrastructure	Before the commencement of construction of the development, the Applicant must: (a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; (b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); (c) submit a copy of the dilapidation report to the Planning Secretary and Council.	Record Record Record	This is outside the scope of the Operational stage. This is outside the scope of the Operational stage. This is outside the scope of the Operational stage.				
G17	SSD10447	A17	Protection of public infrastructure	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and  (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	Record  Record	10/07/2023: Record sighted: Remondis (25 November 2021) Dilapidation Report to Port Stephens Council and DPE.  10/07/2023: Interview: Remondis (RM) stated no repairs required.				
G18	SSD10447	A18	Structural adequacy	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. Note: - Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. - Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	Record	10/07/2023: Record sighted: - Newcert (1 June 2022) Occupation Certificate 21-057-OC1 - Newcert (3 August 2022) Occupation Certificate 21-057-OC2				
G19	SSD10447	A19	Compliance	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Record	10/07/2023: Sighted: - Site Induction program, which also includes SSD Consent 10447 and EPL.				
G20	SSD10447	A20	Contributions to council	Before the issuing of a construction certificate for any part of the development, a payment of a levy of 1% of the proposed cost of carrying out the development must be paid to Council under section 7.12 of the EP&A Act.	Record	This is outside the scope of the Operational stage.				

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G21	SSD10447	A21	Operation of plant and equipment	All plant and equipment used on site, or to monitor the performance of the development, must be: (a) maintained in a proper and efficient condition; and	Record	10/07/2023: Record sighted: - Asset register record for - weekly Australian Bale Press - Monthly Australian Bale Press - 3 monthly Bale Conveyance				
				(b) operated in a proper and efficient manner.	Record	10/07/2023: Record sighted: - weekly inspection record 11/5/23 and 10/3/23				
G22	SSD10447	A22	External walls and cladding	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	Record	10/0/2023: Record sighted: Newcert (21-057-OC2) dated 3 August 2022 OC certificate				
G23	SSD10447	A23	External walls and cladding	Prior to the issuing of: (a) any Construction Certificate relating to the construction of external walls (including the installation of finishes and claddings such as synthetic or aluminium composite panels); and	Record	This is outside the scope of the Operational stage.				
				(b) an Occupation Certificate, the Applicant must provide the Certifier with documented evidence that the products and systems proposed for use or used in the construction of external walls (including finishes and claddings such as synthetic or aluminium composite panels) comply with the requirements of the BCA.	Record	This is outside the scope of the Operational stage.				
G24	SSD10447	A24	External walls and cladding	The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	Record	This is outside the scope of the Operational stage.				
G25	SSD10447	A25	Utilities and services	Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Record	This is outside the scope of the Operational stage.				
G26	SSD10447	A26	Utilities and services	Before the issuing of a Subdivision Works or Construction Certificate for any stage of the development, the Applicant (whether or not a constitutional corporation) is to provide evidence, satisfactory to the Certifier, that arrangements have been made for: (a) the installation of fibre-ready facilities to all individual lots and/or premises in the development to enable fibre to be readily connected to any premises that is being or may be constructed on those lots; and	Record	This is outside the scope of the Operational stage.				
				(b) the provision of fixed-line telecommunications infrastructure in the fibre-ready facilities to all individual lots and/or premises in the development demonstrated through an agreement with a carrier.	Record	This is outside the scope of the Operational stage.				
G27	SSD10447	A27	Utilities and services	Before the issuing of the Occupation Certificate for the development the Applicant must demonstrate that the carrier has confirmed in writing it is satisfied that the fibre ready facilities are fit for purpose.	Record	10/07/2023: Record sighted: - Telstra confirmation email (24 August 2022) that states that "order 2-32350574882 has now been completed and your services are ready for use" The product provided is noted to be "Business IP Ethernet" with effective billing date from 22 August 2022	This item is considered as non-compliant because the communication provided by Telstra was dated after the issue date of both Occupation Certificates listed below.  - Newcert (1 June 2022) Occupation Certificate 21-057-OC1 - Newcert (3 August 2022) Occupation Certificate 21-057-OC2  No recommendation is provided as the document has now been provided.			
G28	SSD10447	A28	Work as executed plans	Before the issuing of the Occupation Certificate for the development, <b>work-as-executed drawings signed by a registered surveyor</b> demonstrating that the <b>stormwater drainage and finished ground levels have been constructed</b> as approved, must be <b>submitted to the Principal Certifier</b> .	Record	3/10/2023: Interview: - Remondis (RM and EL) advised that the stormwater drainage and finished ground levels already exist, prior to issue of SSD, as shown by Northrop design drawings.  Record sighted: 10/07/2023: Record sighted: - OC1 and OC2 checklist - OC2 and CC2 provided does not list Condition 28. - AVID PM email to the Certifier (2 December 2021) provides the Northrop (2 December 2021) 21F School Drive, Tomago – Hardstand and Capping Civil Design. - Nearmap images showed that the site layout, ground, and buildings has been on site prior to SSD issuance. - Northrop (2 December 2021) 21F School Drive, Tomago – Hardstand and Capping Civil Design. Letter states that: Northrop Consulting Engineers Pty Ltd, being professional engineers, certify the civil drawings noted in the attached document transmittal were prepared: a) Under the supervision of a professional civil engineer registered under NER. b) The design intent documented in these drawings is generally in accordance with the relevant civil requirements of the National Construction Code. c) in accordance with the relevant requirements of the National Construction Code, the relevant requirements of AS2890.1, AS2890.2 and 3500 Part 3 ' Stormwater Drainage' and relevant Austroads guidelines; and d) to ensure that swept path of the longest vehicle expected to enter and exit the site, as well as manoeuvrability though the site is in accordance with the relevant AUSTRROADS guidelines. - Work as Constructed drawings (1 April 2022) by David Cant registered surveyor. - Northrop (5 April 2022) letter Re: 21F School Drive, Tomago Hardstand and Capping Civil Construction Certificate. The letter states that "Northrop Consulting Engineers Pty Ltd, being professional engineers, certify that: a) Northrop Engineers have undertaken periodic site inspections during the construction phase of the project. b) We have reviewed the WAE drawings supplied and signed by David Cant Surveyors relating to the capping works (dated 28.03.22). c) Based on the WAE survey and periodic inspections, the stormwater design and levels for the hardstand generally conform with the design plans and instructions given by Northrop Engineers during the construction process."				
G29	SSD10447	A29	Applicability of guidelines	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	Record	Noted				

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G30	SSD10447	A30	Applicability of guidelines	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Record	10/07/2023: Interview: Remondis (RM) stated there has not been any direction from planning.				
G31	SSD10447	AN1	Advisory notes	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	Record	10/07/2023: Interview: Remondis (EL) stated all licenses, approvals etc have been obtained. Record sighted: 1. Apparatus Licence (ACMA) dated 7 June 2023 (1935706/2) 2. Licence register (liquid waste, EPL, trade waste) on internal system (Donesafe).				
<b>Part B Specific Environmental Conditions</b>										
G32	SSD10447	B1	Statutory Requirements	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.	Record	10/07/2023: Record sighted: - JME (6 July 2023) Waste classification for North Lambton Edgeworth and Dora Creek Depot Test Order Request (23-041, 043, 045 and 046).  Interview: Remondis (PW) stated that regular testing is being done onsite before transferring waste to landfill.				
G33	SSD10447	B2	Statutory Requirements	The Applicant must retain all sampling and waste classification data for 6 years in accordance with the requirements of the EPA.	Record	10/07/2023: Interview: Remondis (RM) stated that records of sampling and waste classification will be retained for 6 years.				
G34	SSD10447	B3	Receipt, Storage and Handling of Waste	The Applicant must: (a) only receive waste on site that is authorised for receipt by an EPL;	Record, observation	See also G151 and G215.  10/07/2023: Observation: The waste types observed onsite were included in the EPL (e.g. mine waste (contaminated soil in drums, oily rags, waste oil), cardboard, plastic, coffee pods, glass, timber).  Interviewee (PW) stated that no building waste has been received onsite. No asbestos waste is received onsite.  Sighted: Weighbridge record through Clearweigh for June 2023, which indicated the following waste streams were received and disposed of: cages, ferrous iron or steel, food and garden, glass, mixed hydrocarbon, mixed waste, Nespresso reject, Nespresso cage, non-ferrous metals, oil, paper or cardboard, plastic, plastic film, timber pallets.				
					Record, observation	10/07/2023: Interview: Remondis (PW) stated that Remondis has not sold waste for energy recovery as yet as this is still in R&D stage.				
					Record, observation	10/07/2023: Interview: Remondis (PW) stated that no construction waste has been received.				
					Record, observation	10/07/2023: Remondis (PW) stated that no waste that is not licensed has been received to date.				
					Record	10/07/2023: Observation: a weighbridge was observed onsite.  Sighted: - NSW Nuweigh, calibration record of the weighbridge (18/2/2023).				
				(b) ensure incoming waste complies with the resource recovery criteria specified in Table 4 of the EPA's Energy from Waste Policy Statement 2020 for each waste stream; ( <b>See also G151 and G215</b> )						
				(c) for construction waste, comply with the requirements of the EPA's Standards for managing construction waste in NSW, or its latest version;						
				(d) ensure that any waste received that is not permitted under this consent or the EPL is removed from the site within 48 hours of receipt, or as soon as practicable;						
				(e) maintain and operate a calibrated weighbridge to record the volume of all waste brought into the site.						

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G35	SSD10447	B4	Receipt, Storage and Handling of Waste	The Applicant must not receive or store any asbestos waste on the site.	Record, observation	10/07/2023: Interview: Remondis (PW) stated that no construction waste has been received. Weighbridge operator conducts checks of the load as the truck comes into the site, and then as the material is received the material is spread within the building for inspection. Any asbestos would be removed and work would be stopped, but no asbestos has been identified to date.				
G36	SSD10447	B5	Receipt, Storage and Handling of Waste	Any waste for processing, storage or resource recovery at the site must be assessed and classified in accordance with the EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014), or its latest version.	Record	10/07/2023: Record sighted: - JME (6 July 2023) Waste classification for North Lambton Edgeworth and Dora Creek Depot Test Order Request (23-041, 043, 045 and 046).				
G37	SSD10447	B6	Receipt, Storage and Handling of Waste	All waste processing, including storage and materials handling activities must be undertaken inside buildings. All truck loading and unloading and storage of waste materials must only be carried out within the areas designated for these activities, as described in the EIS and RTS.	Record, observation	10/07/2023: Observation: Waste processing and storage were observed to be inside buildings only. No trucks were observed to arrive onsite.				
G38	SSD10447	B7	Receipt, Storage and Handling of Waste	The Applicant must ensure the height of baled material does not exceed four metres in total.	Record, observation	10/07/2023: Observation: Baled material was observed to be below four metres in high.				
G39	SSD10447	B8	Energy from Waste Management Plan – Eligible Waste Fuels	Prior to the commencement of operation, the Applicant must prepare an Energy from Waste Management Plan (EiWMP) for the handling and distribution of eligible waste fuels, to the satisfaction of the Planning Secretary. The EiWMP must form part of the OEMP and be prepared in accordance with condition C5. The EiWMP must: (a) be prepared by a suitably qualified and experience person(s), in consultation with the EPA	Record	10/07/2023 Record sighted: - Remondis (27 June 2022) Energy from Waste Management Plan – Eligible Fuels. Document was prepared by Rosilyn Florie-George (Remondis former Project Manager) who is a Civil Engineer with a background in environmental consulting and Elizabeth Leahy (Remondis Project Manager at the time) who holds a Bachelor of Science degree in Environmental Science and has worked in environmental consulting prior joining Remondis. Document was also approved by Helen McCarthy (National Environment and Sustainability Manager) Input from EPA were accounted for on 27 June 2022.				
					Record	10/07/2023 Record sighted: - Remondis (27 June 2022) Energy from Waste Management Plan – Eligible Fuels. Section 5, 6, and 7 address this condition.				
					Record	10/07/2023 Record sighted: - Remondis (27 June 2022) Energy from Waste Management Plan – Eligible Fuels. Section 7 addresses this condition.				
					Record	10/07/2023 Record sighted: - Remondis (27 June 2022) Energy from Waste Management Plan – Eligible Fuels. Section 1.1 addresses this condition.				
					Record	10/07/2023 Record sighted: - Remondis (27 June 2022) Energy from Waste Management Plan – Eligible Fuels. Section 6.1 addresses this condition. it is stated that "Where the load is identified as containing, or is reasonably suspected to contain, any asbestos waste, reject the entire load of waste by directing the driver to immediately leave the facility and record the information required in 022-ENV-FO-003 Rejected Load Register"				

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G40	SSD10447	B9	Energy from Waste Management Plan – Eligible Waste Fuels	The Applicant must: (a) not commence operation until the EfWMP is approved by the Planning Secretary;	Record	10/07/2023: Record sighted: - DPE (2 August 2022) Operational Environmental Management Plan for Remondis Resource Recovery Facility Tomago (Condition C5 of SSD-10447). The letter acknowledged OEMP and its subplans (Energy from Waste Management Plan, Water Management Plan, and Air Quality Management Plan) submitted on 2 June 2022. DPE letter also states that the document contains the information required by the conditions of approval, documents were prepared in consultation with the EPA and Council, where required. - Newcert (1 June 2022) Occupation Certificate 21-057-OC1 - Newcert (3 August 2022) Occupation Certificate 21-057-OC2				
				(b) implement the most recent version of the EfWMP approved by the Planning Secretary for the operational life of the development.	Record, observation	10/07/2023: Record sighted: - Remondis (27 June 2022) Energy from Waste Management Plan – Eligible Fuels.  Interview: - Remondis (RM & EL) stated that this plan has not been implemented yet as no energy recovery waste has commenced yet.				
G41	SSD10447	B10	Waste Monitoring Program	From the commencement of operation, the Applicant must implement a Waste Monitoring Program for the development. The program must: (a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;	Record	10/07/2023 Record Sighted: - Remondis (20 April 2022) Tomago Resource Recovery Facility, Waste Monitoring Program. Prepared by E. Leahy (Remondis Project Manager at the time, who holds a Bachelor of Science degree in Environmental Science and has worked in environmental consulting prior joining Remondis) and approved by H.McCarthy who is the National Environment and Sustainability Manager of Remondis. Remondis (RM) stated this is the final copy.				
				(b) include suitable provisions to monitor the: (i) quantity, type and source of waste received on site; (ii) quantity, type and quality of the outputs produced on site; and	Record	Provided in Section 6				
				(c) ensure that staff receive adequate training in order to be able to recognise and handle any prohibited waste including asbestos.	Record	Provided in Section 3.2 and 3.4 but not yet the training for recognition and handling of any prohibited waste including asbestos.  10/07/2023: Record sighted: training record for prohibited waste and asbestos provided and sighted.				
G42	SSD10447	B11	Site Auditor	Prior to the commencement of any earthworks or remediation works for the development on site, the Applicant must engage a Site Auditor accredited under the Contaminated Land Management Act 1997 NSW Site Auditor Scheme.	Record	10/07/2023: Record sighted: - GHD (20 May 2022) Site Audit Report prepared for Remondis Tomago by Mr Ian Gregson of GHD, a NSW EPA accredited site auditor.				
G43	SSD10447	B12	Site Auditor	Upon completion of the remediation works and prior to the commencement of operation, the Applicant must submit to the Planning Secretary, a Site Audit Report and a Site Audit Statement, prepared in accordance with the NSW Contaminated Land Management - Guidelines for the NSW Site Auditor Scheme 2017, which demonstrates the site is suitable for its intended commercial/industrial land use with the implementation of a long term environmental management plan.	Record	10/07/2023: Record sighted: - GHD (20 May 2022) Site Audit Report prepared for Remondis Tomago by Mr Ian Gregson of GHD, a NSW EPA accredited site auditor. - DPE (27 June 2022) Remondis Resource Recovery Facility Tomago (SSD-10447) Approval of Site Audit Report and Statement and Long Term Environmental Management Plan - Conditions B12 and B17. The letter states that the conditions are satisfied.				
G44	SSD10447	B13	Capping Layer Design	Prior to the commencement of remediation works, the Applicant must prepare a detailed design for the capping layer for zinc impacted soils. The detailed design must: (a) be prepared by a suitably qualified and experienced engineer;	Record	10/07/2023: Record sighted: - GHD (20 May 2022) Site Audit Report prepared for Remondis Tomago by Mr Ian Gregson of GHD, a NSW EPA accredited site auditor, include review of design of capping layer for zinc impacted soil.				
				(b) be reviewed and approved by the Site Auditor;	Record	10/07/2023: Record sighted: - GHD (20 May 2022) Site Audit Report prepared for Remondis Tomago by Mr Ian Gregson of GHD, a NSW EPA accredited site auditor.				
				(c) include details of earthworks quantities, site design levels, grading and drainage, selection of an appropriate impermeable geotextile layer and a material movement plan;	Record	10/07/2023: Record sighted: - GHD (20 May 2022) Site Audit Report prepared for Remondis Tomago by Mr Ian Gregson of GHD, a NSW EPA accredited site auditor.				
				(d) include procedures for verifying that capping layer construction is completed in accordance with the approved RAP; and	Record	10/07/2023: Record sighted: - GHD (20 May 2022) Site Audit Report prepared for Remondis Tomago by Mr Ian Gregson of GHD, a NSW EPA accredited site auditor, which includes compliance with RAP.				
				(e) detail alternative measures, such as extending the area of capping, if the required volumes from the remediation area cannot be accommodated under the proposed truck parking area.	Record	10/07/2023: Record sighted: - GHD (20 May 2022) Site Audit Report prepared for Remondis Tomago by Mr Ian Gregson of GHD, a NSW EPA accredited site auditor.				
G45	SSD10447	B14	Capping Layer Design	Prior to the commencement of remediation works, the Applicant must provide written evidence from the Site Auditor, confirming the detailed design of the capping layer has been prepared in accordance with Condition B13.	Record	10/07/2023: Record sighted: - GHD (20 May 2022) Site Audit Report prepared for Remondis Tomago by Mr Ian Gregson of GHD, a NSW EPA accredited site auditor.				
G46	SSD10447	B15	Remedial Works	The Applicant must remediate the site in accordance with the Remedial Action Plan (RAP) prepared by JM Environments dated 17 July 2021 and relevant guidelines produced or approved under the Contaminated Land Management Act 1997. Remediation works must include the pre-remediation groundwater monitoring detailed in the RAP and must be undertaken by a suitably qualified and experienced consultant(s).	Record	10/07/2023: Record sighted: - GHD (20 May 2022) Site Audit Report prepared for Remondis Tomago by Mr Ian Gregson of GHD, a NSW EPA accredited site auditor.				
G47	SSD10447	B16	Remediation and Validation Report	Within two months of completion of the remediation works, the Applicant must submit a Remediation and Validation Report to the satisfaction of the Planning Secretary, which has been prepared, or reviewed and approved, by a consultant certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) Scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme.	Record	10/07/2023: Record Sighted: - Remondis (16 May 2022) Long Term Environmental Management Plan, Tomago Resource Recovery Facility. James McMahon - Director - JM Environments with CEnvP SC41110 qualification				

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G48	SSD10447	B17	Long Term Environmental Management Plan	Prior to the completion of the Site Audit Report and Site Audit Statement for the remediation works, the Applicant must prepare a Long-Term Environmental Management Plan (LTEMP) for the site. The LTEMP must:	Record	10/07/2023: Record Sighted: - Remondis (16 May 2022) Long Term Environmental Management Plan, Tomago Resource Recovery Facility - James McMahon - Director - JM Environments with CEnvP SC41110 qualification				
				(a) be prepared by a suitably qualified and experienced consultant;	Record	10/07/2023: Record sighted: - GHD (20 May 2022) Site Audit Report prepared for Remondis Tomago by Mr Ian Gregson of GHD, a NSW EPA accredited site auditor.				
				(b) be reviewed and approved by the Site Auditor;	Record	Provided in Section 9				
				(c) detail measures to identify and monitor contamination remaining on site;	Record	Provided in Section 11.1				
				(d) detail the post-remediation groundwater monitoring program;	Record	Provided in Section 2.2				
				(e) include a program for ongoing review to ensure that the LTEMP remains contemporary with relevant environmental standards;	Record	Provided in Section 11.1				
G49	SSD10447	B18	Long Term Environmental Management Plan	Upon completion of the Site Audit Statement and Site Audit Report, the Applicant must:	Record	Assessed in G251 onwards 10/07/2023: Record sighted - JME (5 March 2023) Groundwater Monitoring Report, as required as part of the ongoing monitoring at the site.				
				(a) implement the approved LTEMP;	Record	10/07/2023: Record sighted: - Port Stephens Council (31 August 2023) PLANNING CERTIFICATE PURSUANT TO SECTION 10.7 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979 for Parcel No: 38076 LOT: 8 DP: 270328 and Parcel No: 45464 LOT: 11 DP: 270328 Both documents for both parcels of land states "Council has been notified a Long Term Environmental Management Plan applies to the land".				
G50	SSD10447	B19	Erosion and Sediment Control	Prior to the commencement of any construction for the development, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by condition C2.	Observation	This is outside the scope of the Operational stage, noting that this could not be observed during the Operational stage.				
G51	SSD10447	B20	Erosion and Sediment Control	Prior to the commencement of remediation works and construction at 21F School Drive, the Applicant must install bunding to contain runoff for a 24 hour rainfall event at 1% AEP for remediation works and construction.	Observation	This is outside the scope of the Operational stage, noting that this could not be observed during the Operational stage.				
G52	SSD10447	B21	Discharge Limits	The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	Record	10/07/2023: Interview: Remondis (PW) stated that no waste discharge is conducted from the site. Water for vehicle wash is collected into a oil water separator. The treated water is collected in a tank for collection for offsite disposal. The oil is collected and placed into the oil tank for offsite disposal.				
G53	SSD10447	B22	Groundwater	The Applicant must obtain relevant water access licence/s in accordance with the Water Management Act 2000, if the development will intercept groundwater	Record	10/07/2023: Interview: Remondis (RM) stated that they did not or do not currently intend to extract groundwater or surface water, therefore do not seek a water licence for this Site.				
G54	SSD10447	B23	Groundwater	The Applicant must monitor groundwater on a monthly basis during remediation and post-remediation in accordance with, and for the duration detailed in, the RAP.	Record	10/07/2023: 10/07/2023: Record sighted - JME (5 March 2023) Groundwater Monitoring Report. The report shows that groundwater has been monitored on a monthly basis.				

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G55	SSD10447	B24	Stormwater Management System	<p>The Applicant must design, construct and operate a stormwater management system for the development that:</p> <p>(a) is designed by a suitably qualified and experienced person(s), in accordance with the conceptual design in the EIS;</p> <p>(b) be in accordance with applicable Australian Standards;</p> <p>(c) designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines;</p> <p>(d) designed to:</p> <p>(i) divert existing clean surface water around operational areas of the site;</p> <p>(ii) prevent discharge of leachate from the buildings into the stormwater system; and</p> <p>(iii) capture all wastewater from the truck wash.</p> <p>(e) designed to ensure peak stormwater flows from the site do not exceed pre-development flows in any downstream areas for 24 hour rainfall events up to and including the 1% AEP;</p> <p>(f) achieves the pollutant reduction targets in Port Stephens Development Control Plan 2014.</p>	<p>Record</p> <p>Record</p> <p>Record</p> <p>Record</p> <p>Record</p> <p>Record</p> <p>Record</p>	<p>10/07/2023: Record sighted: - Northrop (6 December 2021) 21F School Drive, Tomago – Hardstand and Capping Civil Design. Letter states that "Northrop Consulting Engineers Pty Ltd, being professional engineers, certify the civil drawings noted in the attached document transmittal were prepared: a) Under the supervision of a professional civil engineer registered under NER. b) The design intent documented in these drawings is generally in accordance with the relevant civil requirements of the National Construction Code. c) in accordance with the relevant requirements of the National Construction Code, the relevant requirements of AS2890.1, AS2890.2 and 3500 Part 3 'Stormwater Drainage' and relevant Austroads guidelines; and d) in accordance with Condition B24 and B38 of the Development Consent, where relevant to the hardstand parking area (Lot 21F). This certificate shall not be construed as relieving any other part of their responsibilities." Document in the document list include Civil Notes, Site Plan, Concept sediment and erosion control, Sediment and erosion control details, Bulk earthworks plan, Long sections, Civil works plan, Civil detail sheet 1, Materials movement and remediation staging plan.</p> <p>- Northrop (5 April 2022) Re: 21F School Drive, Tomago – Hardstand and Capping Civil Construction Certificate. Letter stated that " Northrop Consulting Engineers Pty Ltd, being professional engineers, certify that: a) Northrop Engineers have undertaken periodic site inspections during the construction phase of the project. b) We have reviewed the WAE drawings supplied and signed by David Cant Surveyors relating to the capping works (dated 28.03.22). c) Based on the WAE survey and periodic inspections, the stormwater design and levels for the hardstand generally conform with the design plans and instructions given by Northrop Engineers during the construction process. We acknowledge that the OSD system, due to the extremely wet weather has not been finalised and as such does not form part of this certification. The open basin currently on site does contain a volume in excess of that required by the final design and as such will be performing the function of detention as required by the Development Consent. It is understood that the OSD system will be fully completed once conditions allow."</p>	<p>This item is considered as non-compliant as there is insufficient evidence that the OSD has been constructed as per design plans by Northrop.</p> <p><b>Recommendation:</b> <b>Confirmation should be obtained from Northrop to confirm that the OSD system has been completed per the design.</b></p>			
G56	SSD10447	B25	Sewage Management System	<p>Prior to the commencement of operation, the Applicant must obtain approval from Council under Section 68 of the Local Government Act 1993 for use of the on-site sewage management system for the development. The Applicant must provide a report from a suitably qualified consultant demonstrating the existing on-site sewage management system complies with the requirements of Port Stephens Development Assessment Framework.</p>	<p>Record</p>	<p>10/07/2023: Record sighted: - Northrop (27 August 2020) Soil and Water Management Plan for 21D &amp; 21F Schools Drive, Tomago. - Port Stephens Council, Renewal of Approval to Operate a System of Sewage Management. "Date from which approval operates: 1 September 2021. Date on which approval lapses: 31 August 2022. This approval is to operate a system of sewage management in the Port Stephens Council Local Government Area, required under the Local Government Act 1993 (Section 68)." - Envirocycle/AWTS (23 June 2023), AWTS Service Status. In this letter, the NSW Sales and Operation Manager of AWTS Maintenance Services Pty Ltd states that: 1. Treatment System is Operational and Satisfactory ("System meets standards set in council approval. Operating a designed"). 2. Ongoing Management is Active and "System is serviced every 3 months as per LGA standards/ requirements. Copy of service report is provided to both client and council."</p>				

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G57	SSD10447	B26	Water Management Plan	Prior to the commencement of operation of the development, the Applicant must prepare a Water Management Plan to the satisfaction of the Planning Secretary. The Water Management Plan must form part of the OEMP required by condition C5 and must:	Record	10/07/2023: Record sighted: - Remondis (14 July 2022 revised in September 2023) Tomago Resource Recovery Facility and Truck Parking Depot Water Management Plan Document was prepared by Eric Wingate, SMEC - DPE (2 August 2022) Operational Environmental Management Plan for Remondis Resource Recovery Facility Tomago (Condition C5 of SSD-10447). The letter acknowledged OEMP and its subplans (Energy from Waste Management Plan, Water Management Plan, and Air Quality Management Plan) submitted on 2 June 2022. DPE letter also states that the document contains the information required by the conditions of approval, documents were prepared in consultation with the EPA and Council, where required.				
				(a) be prepared by a suitably qualified and experienced person(s);						
				(b) be prepared in consultation with Council and EPA;	Record	EPL 21636 is referred to. Council's Development Control Plan (DCP) (PSC, 2014) requirements were referred to and a MUSIC model (Version 6) was produced as part of the SWMP (Northrop, 2020), to assess the performance of the additional stormwater treatment infrastructure to be installed as part of the proposed development.  Record sighted: - Email correspondences between Remondis and Port Stephen Council (2 June 2022, 20 and 21 June 2022). Council states that council "consider that the plan does meet the requirements of having be prepared in consultation of Council".				
				(c) provide details of:	Record	Provided in Section 3.2				
				(i) water use, metering, disposal and management on-site;	Record	Provided in Section 5.1				
				(ii) the number and location of piezometers on-site;	Record	Provided in Section 2.3				
				(iii) the water licence requirements for the development;	Record	Provided in Section 3.2.1				
				(iv) the management of wastewater streams on-site including leachate and fire water;	Record	Provided in Section 4.2, 6.1 and 6.3.1, 6.4				
				(d) contain a Surface Water Management Plan, including:	Record	Provided in Section 5.1				
				(i) a program to monitor: • surface water flows and quality; • surface water storage and use; and • detention basin operation;	Record	Provided in Section 5.2 and 6.2, 6.3.3, and 6.4				
(e) contain a Groundwater Management Plan, including:	Record	Provided in Section 6, 6.3.3, and 6.4								
(i) baseline data on groundwater levels and quality;	Record	Provided in Section 6.3.3.								
(ii) a program to monitor groundwater levels and quality on a monthly basis;	Record									
(iii) groundwater impact assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts; and	Record									
(iv) a protocol for the investigation and mitigation of identified exceedances of the groundwater impact assessment criteria.	Record									
G58	SSD10447	B27	Water Management Plan	The Applicant must:	Record	10/07/2023: Record sighted: - DPE (2 August 2022) Operational Environmental Management Plan for Remondis Resource Recovery Facility Tomago (Condition C5 of SSD-10447). The letter acknowledged OEMP and its subplans (Energy from Waste Management Plan, Water Management Plan, and Air Quality Management Plan). DPE letter also states that the document contains the information required by the conditions of approval, documents were prepared in consultation with the EPA and Council, where required. - Newcert (1 June 2022) Occupation Certificate 21-057-OC1 - Newcert (3 August 2022) Occupation Certificate 21-057-OC2				
				(a) not commence operation until the Water Management Plan required by condition B26 is approved by the Planning Secretary; and						
				(b) implement the most recent version of the Water Management Plan approved by the Planning Secretary for the duration of the development.	Record	10/07/2023: Record sighted: - Remondis (14 July 2022 revised in September 2023) Tomago Resource Recovery Facility and Truck Parking Depot Water Management Plan Interview: - Remondis (EL) confirmed that Remondis (14 July 2022 revised on September 2023) Tomago Resource Recovery Facility and Truck Parking Depot Water Management Plan, is the one submitted and approved by DPE on 2 Aug 2022 and currently used.				
G59	SSD10447	B28	Air Quality Discharges	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	Record	10/07/2023: Record sighted: - DPE (8 July 2022) Odour control installation. - Remondis (27 May 2022) SSE-10447 Tomago Resource Recovery Facility Condition B33 for your approval				
G60	SSD10447	B29	Odour	The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Record	10/07/2023: Interview: - Remondis (RM) confirmed no complaints have been received since commencement of operations.				
G61	SSD10447	B30	Dust and Odour Minimisation	The Applicant must take all reasonable steps to minimise dust and odour generated during all works authorised by this consent.	Observation	10/07/2023: Observation: No unacceptable odour or dust were observed during the Audit.				

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G62	SSD10447	B31	Dust and Odour Minimisation	The Applicant must ensure that: (a) all material handling, processing, storage surfaces and truck routes are sealed;	Observation	10/07/2023: Observation: All surfaces accessible for truck routes, handling, processing and storage areas were sealed.				
				(b) truck routes are regularly cleaned to remove dirt, water sprays are used on road surfaces to reduce visible dust plumes and trucks do not track dirt onto the public road network;	Observation	10/07/2023: Observation: Truck routes were observed to be in clean condition.				
				(c) all trucks entering or leaving the site with loads have their loads covered, except during material inspection, unloading and loading; and	Observation	10/07/2023: Observation: No trucks were observed entering or leaving the site.				
				(d) truck idling is minimised where possible.	Observation	10/07/2023: Observation: No trucks were observed to be idling.				
G63	SSD10447	B32	Odour Controls	Prior to the commencement of construction of the food de-packaging plant, the Applicant must provide a detailed design of the odour control unit on the food de-packaging plant, to the satisfaction of the Planning Secretary. The design must include:	Record	This is outside the scope of the Operational stage.				
				(a) details of the treatment method;	Record	This is outside the scope of the Operational stage.				
				(b) size and capacity of the unit;	Record	This is outside the scope of the Operational stage.				
				(c) details of the control efficiencies that the unit would achieve; and	Record	This is outside the scope of the Operational stage.				
G64	SSD10447	B33	Odour Controls	Prior to the commencement of operation, the Applicant must provide written evidence to the satisfaction of the Planning Secretary, demonstrating that odour controls, such as a carbon filter drum or equivalent odour control measure, has been installed for waste oil unloading activities, to minimise benzene emissions.	Record	10/07/2023: Record sighted: - DPE (8 July 2022) Remondis Resource Recovery Facility Tomago (SSD-10447) Condition B33 Odour Controls. Letter states that Department has reviewed the information and is satisfied that the installation of the carbon filter drums has adequately fulfilled the relevant condition.				
G65	SSD10447	B34	Air Quality Verification Report	Prior to the commencement of construction of the food de-packaging plant, the Applicant must prepare an Air Quality Verification Report (AQVR), prepared by a suitably qualified and experienced air quality consultant and submitted to the satisfaction of the Planning Secretary.	Record	This is outside the scope of the Operational stage.				
G66	SSD10447	B35	Air Quality Verification Report	The AQVR required by condition B34 must:	Record	This is outside the scope of the Operational stage.				
				(a) be prepared in consultation with the EPA;	Record	This is outside the scope of the Operational stage.				
				(b) be conducted in accordance with the EPA's Approved Methods for the Modelling and Assessment of Air Pollutants in NSW; and	Record	This is outside the scope of the Operational stage.				
				(c) be based on the final design of the development, including the odour control unit required by Condition B32.	Record	This is outside the scope of the Operational stage.				

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G67	SSD10447	B36	Air Quality Management Plan	Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) for the development, to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by Condition C5 and must:	Record	10/07/2023: Record sighted: - Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. Prepared by Melissa Gilbert, a Consultant with B. EnvSc  - DPE (2 August 2022) Operational Environmental Management Plan for Remondis Resource Recovery Facility Tomago (Condition C5 of SSD-10447). The letter acknowledged OEMP and its subplans (Energy from Waste Management Plan, Water Management Plan, and Air Quality Management Plan). DPE letter also states that the document contains the information required by the conditions of approval, documents were prepared in consultation with the EPA and Council, where required.				
				(a) be prepared by a suitably qualified and experienced person(s);						
				(b) detail and rank all significant emission sources from the development;	Record	10/07/2023: Record sighted: - Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. Section 3 provides this.				
				(c) identify the control measures, including proactive and reactive mitigation measures that will be implemented for each emission source;	Record	10/07/2023: Record sighted: - Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. Section 5 provides this.				
				(d) include the following for each emission source: (i) risk assessment;	Record	10/07/2023: Record sighted: - Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. Section 5 provides this.				
				(ii) key performance indicator;	Record	10/07/2023: Record sighted: - Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. Section 5 provides this.				
				(iii) monitoring method;	Record	10/07/2023: - Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. Section 4 provides this.				
				(iv) location, frequency and duration of monitoring;	Record	10/07/2023: - Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. Section 4 provides this.				
				(v) record keeping;	Record	10/07/2023: Record sighted: - Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. Section 6 provides this.				
(vi) response mechanism and contingency measures; and	Record	10/07/2023: Record sighted: - Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. Section 6 provides this.								
(vii) compliance reporting.	Record	10/07/2023: - Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. Section 5.5. states Section 7 states "Shift Supervisor Responsibility: Reports to Operations Manager on operational and performance matters that require infrastructure support." Section 8 states "QOMP should be read in conjunction with the REMONDIS IMP and reporting obligations as specified in EPL 4571"								
G68	SSD10447	B37	Air Quality Management Plan	The Applicant must:	Record	10/07/2023: Record sighted: - DPE (2 August 2022) Operational Environmental Management Plan for Remondis Resource Recovery Facility Tomago (Condition C5 of SSD-10447). The letter acknowledged OEMP and its subplans (Energy from Waste Management Plan, Water Management Plan, and Air Quality Management Plan). DPE letter also states that the document contains the information required by the conditions of approval, documents were prepared in consultation with the EPA and Council, where required. - Newcert (1 June 2022) Occupation Certificate 21-057-OC1 - Newcert (3 August 2022) Occupation Certificate 21-057-OC2				
				(a) not commence operation until the AQMP required by Condition B36 is approved by the Planning Secretary; and						
				(b) implement the most recent version of the AQMP approved by the Planning Secretary for the duration of operation.	Record	10/07/2023: Record sighted: - Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. Interview: - Remondis (RM) confirmed that Remondis (14 June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan, is the one submitted and approved by DPE on 2 Aug 2022 and currently used.				

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G69	SSD10447	B38	Operating Conditions	The Applicant must ensure: (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of AS 2890.1:2004 Parking facilities Off-street car parking (Standards Australia, 2004), AS 2890.2:2018 Parking facilities Off-street commercial vehicle facilities (Standards Australia, 2018) and AS 2890.6:2009 Parking facilities Off-street parking for people with disabilities (Standards Australia, 2009)	Record	<p>3/10/2023: Interview: - Remondis (RM and EL) advised that the internal roads, driveways and parking were already built prior to issue of SSD. The architectural drawings by AJE Architecture are as built drawing.</p> <p>10/07/2023: Record sighted: - AJE Architecture drawings prepared for CC: 1. Drawing No A-000 Rev L 17 March 2022 - COVERSHEET 2. Drawing No A-002 Rev N 17 March 2022 SITE / ROOF PLAN 3. Drawing No A-002 Rev Q 17 March 2022 SITE PLAN - MOVEMENT &amp; ACCESS AJE states that drawings are "in accordance with DA Conditions A18 and B38" -- OC 1 and OC2</p> <p>- Northrop (6 December 2021) 21F School Drive, Tomago – Hardstand and Capping Civil Design. Letter states that "Northrop Consulting Engineers Pty Ltd, being professional engineers, certify the civil drawings noted in the attached document transmittal were prepared: a) Under the supervision of a professional civil engineer registered under NER. b) The design intent documented in these drawings is generally in accordance with the relevant civil requirements of the National Construction Code. c) in accordance with the relevant requirements of the National Construction Code, the relevant requirements of AS2890.1, AS2890.2 and 3500 Part 3 ' Stormwater Drainage' and relevant Austroads guidelines; and d) in accordance with Condition B24 and B38 of the Development Consent, where relevant to the hardstand parking area (Lot 21F)."</p> <p>- Northrop (2 December 2021) 21F School Drive, Tomago – Hardstand and Capping Civil Design. Letter states that "Northrop Consulting Engineers Pty Ltd, being professional engineers, certify the civil drawings noted in the attached document transmittal were prepared: a) Under the supervision of a professional civil engineer registered under NER. b) The design intent documented in these drawings is generally in accordance with the relevant civil requirements of the National Construction Code. c) in accordance with the relevant requirements of the National Construction Code, the relevant requirements of AS2890.1, AS2890.2 and 3500 Part 3 ' Stormwater Drainage' and relevant Austroads guidelines; and d) to ensure that swept path of the longest vehicle expected to enter and exit the site, as well as</p>				
				(b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTRROADS guidelines;	Record					
				(c) the development does not result in any vehicles queuing on the public road network;	Observation	10/07/2023: Observation: No vehicles were observed to be queuing on the public road network.				
				(d) heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site;	Observation	10/07/2023: Observation: No heavy vehicles or bins were observed to be parked on local roads or footpaths.				
				(e) all vehicles are wholly contained on site before being required to stop;	Observation	10/07/2023: Observation: All vehicles were observed to be wholly contained on the site.				
				(f) all loading and unloading of materials is carried out on-site; and	Observation	10/07/2023: Observation: No loading and unloading of materials were observed to be carried out onsite. Loading area was observed to be well into the site boundary.				
				(g) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.	Observation	10/07/2023: Observation: Turning areas in the carpark were observed to be clear of obstacles.				

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G70	SSD10447	B39	Parking	The Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that traffic associated with the development does not utilise public and residential streets or public parking facilities.	Observation	10/07/2023: Observation: Sufficient parking was observed.													
G71	SSD10447	B40	Hours of Work	The Applicant must comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Planning Secretary.  <b>Table 1 Hours of Work</b> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td>Construction</td> <td>Monday – Friday Saturday</td> <td>7 am to 6 pm 8 am to 1 pm</td> </tr> <tr> <td>Operation</td> <td>Monday – Sunday</td> <td>24 hours</td> </tr> </tbody> </table>	Activity	Day	Time	Construction	Monday – Friday Saturday	7 am to 6 pm 8 am to 1 pm	Operation	Monday – Sunday	24 hours	Record	10/07/2023: Record sighted: Sign in / sign out book located at the reception for the operational phase only, noting that the consent allows for 24 hour-operation.				
Activity	Day	Time																	
Construction	Monday – Friday Saturday	7 am to 6 pm 8 am to 1 pm																	
Operation	Monday – Sunday	24 hours																	
G72	SSD10447	B41	Hours of Work	Works outside of the hours identified in condition B40 may be undertaken in the following circumstances: (a) works that are inaudible at the nearest sensitive receivers; (b) works agreed to in writing by the Planning Secretary; (c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or (d) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.	Record	Not applicable, as consent allows for 24 hours 7 days operation.													
G73	SSD10447	B42	Operational Noise Limits	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in Table 2.  <b>Table 2 Noise Limits (dB(A))</b> <table border="1"> <thead> <tr> <th>Location</th> <th>Day LAeq(15 minute)</th> <th>Evening LAeq(15 minute)</th> <th>Night LAeq(15 minute)</th> <th>Night LA<sub>F</sub>Max</th> </tr> </thead> <tbody> <tr> <td>Any residential receiver</td> <td>45</td> <td>42</td> <td>40</td> <td>52</td> </tr> </tbody> </table> <p><i>Note: Noise generated by the development is to be measured in accordance with the relevant procedures and modifications (including certain meteorological conditions) of the NSW Noise Policy for Industry (EPA, 2017) (as may be updated or replaced from time to time).</i></p>	Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Night LA <sub>F</sub> Max	Any residential receiver	45	42	40	52	Record	10/07/2023: Record sighted: - Intercity Hearing Safety (15 Dec 2022) Noise Survey, which confirmed potential risk of noise is minimal.			
Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Night LA <sub>F</sub> Max															
Any residential receiver	45	42	40	52															
G74	SSD10447	B43	Construction Noise Limits	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009) (as may be updated or replaced from time to time). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures included in the CEMP in accordance with condition C2.	Record	This is outside the scope of the Operational stage.													
G75	SSD10447	B44	Dangerous Goods	The quantities of dangerous goods <b>stored and handled</b> at the site must be <b>below the threshold quantities</b> listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.	Record	10/07/2023: Interview: Remondis (RM) advised that "The site does not store any Dangerous Goods that exceed the threshold requirements for Dangerous Goods storage. The storage and management of hazardous chemicals in the integrated management plan provided outlines the management of DG storage onsite Record sighted: - ChemAlert Stock Inventory by Location (Tomago) lists the number of containers and their quantity. The list was checked against the threshold quantities listed in Table 1 and 2 of the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33. Listed chemicals in Stock Inventory appear to be under the threshold in Table 1 and 2. However, Argon and Oxygen exceed the Appendix 7 Table 6. According to Appendix 7, "where dangerous goods are used or stored in volumes greater than the threshold quantities detailed below" (i.e. Table 6) ", WorkCover NSW must be notified, and manifests and emergency plans must be developed."  05/10/2023: Interview: - Remondis (RM) stated that the amount of Argon and Oxygen specified in ChemAlert might be incorrect but was unable to check this.	This item is considered as non-compliant as Argon and Oxygen quantities listed in the inventory list provided are above the threshold of Appendix 7 Table 6 of Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33. However, Remondis states that the specified argon and oxygen amount in ChemAlert may be incorrect.  <b>Recommendations:</b> Inventory quantity for Argon and Oxygen should be checked. Where quantities exceed the quantity listed in Appendix 7 Table 6 of SEPP33, appropriate notification, manifest and emergency plans must be developed in accordance with the SEPP.												

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G76	SSD10447	B45	Dangerous Goods	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with: (a) all relevant Australian Standards;	Record, observation	10/07/2023: Observation: - Dangerous goods were observed to be stored in the workshop area and in the chemical storage area on paved area. - Some chemicals within the chemical storage area were not present in bunds, however the storage area was paved and there is a blind (existing/old) collection system. Remondis states that any spill into this containment will be collected for offsite disposal. - Some drums in the chemical storage area were observed to have the taps outside the bunded area. Photographs provided after the Audit indicated this had been rectified. - Above ground diesel tank and waste oil tanks were observed to be present in the refuelling area, on paved area. - Spill kits were observed. - A chemical cabinet (unbunded) was observed outside the chemical storage area. Photographs provided after the Audit showed that the chemicals were removed and the cabinet was empty. - The diesel tank has a plate stating compliance to AS 1692-2006 and AS1657-1992 and AS1940-2017 UL 142 & ULC-S601.  Sighted: - Tank Solutions Quotation Proposal states that the tanks were certified to AS1692-2006, 1940-2017 and UL142.	<b>Recommendations: Chemical containers/drums (and their taps) should be placed wholly within their bunding. Decanting of chemicals should be conducted in bunded areas.</b>			
				(b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and	Record, observation	10/07/2023: Observation: - The chemical drums were stored on bunds. Capacity of bunds could not be observed, noting that the chemical storage has a spill collection area (as described above).  Record sighted: - Tank Solutions Quotation Proposal states that the tanks were certified to AS1692-2006, 1940-2017 and UL142.				
				(c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management – technical bulletin (EPA, 1997).	Record, observation	10/07/2023: Observation: - Bunding was observed (as listed above). - Spill kits were present. - All chemicals were stored on paved areas.				
G77	SSD10447	B46	Dangerous Goods	In the event of an inconsistency between the requirements of conditions B45(a) to B45(c), the most stringent requirement must prevail to the extent of the inconsistency.		Noted, noting that observation and records provided onsite indicated chemical storage was compliant.				
G78	SSD10447	B47	Bunding	The Applicant must store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual (Department of Environment and Climate Change, 2007).	Observation	See Item G76				
G79	SSD10447	B48	Emergency Plan	Prior to the commencement of operation, the Applicant must prepare and submit to the Planning Secretary an Emergency Plan for the development. The Emergency Plan must: (a) be prepared in accordance with Australian Standard AS 7345 – 2010 Planning for emergencies in facilities;		10/07/2023: Record sighted: - Remondis (11 March 2022) Tomago Resource Recovery Facility Emergency Response Management Plan				
				(b) include procedures for bushfire evacuation and management planning, consistent with the recommendations of the Bushfire Assessment Report: Proposed Recycling Facility, Lot 7 and Lot 11 DP 270328, 21D and 21F School Drive, Tomago prepared by Newcastle Bushfire Consulting dated 11 November 2020; and		Provided in Sections 6.1.1 and 11.2				
				(c) include flood risk management procedures including: (i) clear triggers for implementing flood risk mitigation actions, such as flood heights at a local gauge or flood warnings from the Bureau of Meteorology; (ii) flood emergency responses, consistent with the State Emergency Service local flood plan; (iii) predicted flood levels; (iv) flood warning time and flood notification; (v) contact details for the State Emergency Service; (vi) assembly points, refuge and evacuation routes and protocols to maintain personal safety of occupants; and (vii) awareness training for employees and contractors.		Port Stephens Council flood map, the property is not considered to be flood-prone area.				

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G80	SSD10447	B49	FIRE SAFETY	The Applicant must design, install and operate the development to meet the requirements of FRNSW's Fire Safety in Waste Facilities 2020, or as otherwise approved by Fire & Rescue NSW (FRNSW).	Record	10/07/2023: Record sighted: Newcert (3 August 2022) OC2 (Certificate no 21-057-OC2)				
G81	SSD10447	B50	FIRE SAFETY	The Applicant must consult FRNSW during the fire engineering brief consultation process for the development.	Record	10/07/2023: Record sighted: -Email from FRNSW (7 April 2020) - consultation and conditions required to address.				
G82	SSD10447	B51	FIRE SAFETY	If there are any significant changes to the approved site layout, processing capacity or accepted waste streams, including combustible materials, the Applicant must reassess the fire and life safety measures for the development, re-consult FRNSW and obtain approval from the Planning Secretary.	Record	10/07/2023: Remondis (EL) confirmed no significant changes to the layout since OC issued in August 2022.				
G83	SSD10447	B52	BUSHFIRE PROTECTION	The Applicant must ensure: (a) the development complies with the relevant provisions of Planning for Bushfire Protection 2019; (b) the site is managed as an inner protection area in accordance with the recommendations of the Bushfire Assessment Report: Proposed Recycling Facility, Lot 7 and Lot 11 DP 270328, 21D and 21F School Drive, Tomago prepared by Newcastle Bushfire Consulting dated 11 November 2020; and (c) landscaping on site is maintained and managed in accordance with Planning for Bushfire Protection 2019.	Record	10/07/2023: Record sighted: FRNSW Email (15 April 2020) provided recommendations which were addressed in the EIS.				
					Record	10/07/2023: Observation: Minimal landscaping is present onsite. Majority of site is paved.				
					Record	10/07/2023: Observation: Minimal landscaping is present onsite. Majority of site is paved.				
G84	SSD10447	B53	Biodiversity Offsets	Prior to any clearing or construction works for the development, the Applicant must purchase and retire one (1) species credit species to offset the removal of 0.1 hectares of Mahony's Toadlet (Uperoleia mahonyi) habitat on the site. The species credits must be retired in accordance with the requirements of the EES Group's Biodiversity Offsets Scheme and the Biodiversity Conservation Act 2016.	Record	This is outside the scope of the Operational stage.				
G85	SSD10447	B54	Biodiversity Offsets	The requirement to retire species credits (see Condition B53) may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of species credits, as calculated by the EES Group's Biodiversity Offsets Payment Calculator.	Record	This is outside the scope of the Operational stage.				
G86	SSD10447	B55	Biodiversity Offsets	The Applicant must provide the Planning Secretary with evidence that: (a) the retirement of species credits has been completed (see Condition B53); or (b) a payment has been made to the Biodiversity Conservation Fund (see Condition B54), prior to undertaking any clearing or construction works for the development.	Record	This is outside the scope of the Operational stage.				
					Record	This is outside the scope of the Operational stage.				
G87	SSD10447	B56	Priority Weed Management	The Applicant must: (a) implement suitable measures to manage declared priority weeds on the site; and  (b) inspect the site on a regular basis to ensure that these measures are working effectively, and that priority weeds are not present on site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area. <i>Note: For the purposes of this condition, priority weed has the same definition of the term in the Biosecurity Act 2015.</i>	Observation	10/07/2023: Observation: Most of the site was observed to be paved, only several garden beds were observed in the carpark area. The garden beds appeared to be adequately maintained.				
					Record	Record sighted: - Site HSEQ Inspection (INS34948) in DoneSafe dated 26 Sept 2023 includes the following question: "Have weeds been managed appropriately so that they do not present an environmental hazard? I.e. is there any overgrowth or significant weeds observed?", which indicated that weeds are considered during site inspection.				
G88	SSD10447	B57	Unexpected Finds Protocols	If any item or object of Aboriginal heritage significance is identified on site: (a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately; (b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and (c) Heritage NSW must be contacted immediately.	Record	10/07/2023: Remondis (PW) stated that no Aboriginal heritage object was encountered during construction.				
					Record	10/07/2023: Remondis (PW) stated that no Aboriginal heritage object was encountered during construction.				
					Record	10/07/2023: Remondis (PW) stated that no Aboriginal heritage object was encountered during construction.				
G89	SSD10447	B58	Unexpected Finds Protocols	Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the National Parks and Wildlife Act 1974.	Record	10/07/2023: Remondis (PW) stated that no Aboriginal heritage object was encountered during construction.				
G90	SSD10447	B59	Unexpected Finds Protocols	If any archaeological relics are uncovered during the course of the work, then all works must cease immediately in that area. Unexpected finds must be evaluated and recorded in accordance with the requirements of Heritage NSW.	Record	10/07/2023: Remondis (PW) stated that no archaeological object was encountered during construction.				
G91	SSD10447	B60	Site Induction	Prior to the commencement of construction, the Applicant must prepare and implement Aboriginal cultural heritage and Non-Aboriginal heritage induction training for all staff and contractors. The training must outline the obligations of staff and contractors under the National Parks and Wildlife Act 1974 and the Heritage Act 1977.	Record	This is outside the scope of the Operational stage.				
G92	SSD10447	B61	Lighting	The Applicant must ensure the lighting associated with the development: (a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 2019); and  (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	Record	10/07/2023: Record sighted: - Notes in CC1 and CC2 checklist provided. It is noted that for CC1 (for the truck parking depot) there is "no fix lighting planned" and this Condition is considered "N/A" in the note. For CC2 (all other area) it is noted that "no change to the existing lighting on 21D" School Drive Tomago				
					Record, observation	10/07/2023: Record sighted: - No complaints on lighting has occurred.				
G93	SSD10447	B62	Signage and Fencing	All signage and fencing must be erected in accordance with the development plans included in the EIS. <i>Note: This condition does not apply to temporary construction and safety related signage and fencing.</i>	Observation	10/07/2023: Observation: Fencing was observed around the perimeter of the site as per the development plan in the EIS. The EIS states that Part 3 of SEPP 64 does not apply for signage.				
<b>Part C Environmental Management, Reporting, and Auditing</b>						10/07/2023:				

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G94	SSD10447	C1	Management Plan Requirements	<p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <p>(a) details of:</p> <p>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</p> <p>(ii) any relevant limits or performance measures and criteria; and</p> <p>(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;</p> <p>(b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</p> <p>(c) a program to monitor and report on the:</p> <p>(i) impacts and environmental performance of the development; and</p> <p>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</p> <p>(d) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</p> <p>(e) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>(f) a protocol for managing and reporting any:</p> <p>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</p> <p>(ii) complaint;</p> <p>(iii) failure to comply with statutory requirements; and</p> <p>(g) a protocol for periodic review of the plan.</p> <p><i>Note: the Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</i></p>	Record	<p>Provided in:</p> <ul style="list-style-type: none"> <li>- Remondis (2 June 2022) Integrated Management Plan, Tomago Resource Recovery Facility.</li> <li>- Remondis (27 June 2022) Energy from Waste Management Plan – Eligible Fuels.</li> <li>- Remondis (11 March 2022) Tomago Resource Recovery Facility Emergency Response Management Plan</li> <li>- Remondis (22 March 2022) Pollution Incident Response Management Plan, Tomago Resource Recovery Facility</li> <li>- Remondis (14 July 2022 revised in September 2023) Tomago Resource Recovery Facility and Truck Parking Depot Water Management Plan</li> <li>- Remondis (June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan</li> </ul>				
G95	SSD10447	C2	CONSTRUCTION ENVIRONMENTAL MANAGEMENT	The Applicant must prepare a Construction Environmental Management Plan (CEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	Record	This is outside the scope of the Operational stage.				
G96	SSD10447	C3	CONSTRUCTION ENVIRONMENTAL MANAGEMENT	As part of the CEMP required under condition C2 of this consent, the Applicant must include an Erosion and Sediment Control Plan (see condition B19).	Record	This is outside the scope of the Operational stage.				
G97	SSD10447	C4	CONSTRUCTION ENVIRONMENTAL MANAGEMENT	The Applicant must:	Record	This is outside the scope of the Operational stage.				
				(a) not commence construction of the development until the CEMP is approved by the Planning Secretary; and	Record	This is outside the scope of the Operational stage.				
				(b) carry out the construction of the development in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time.	Record	This is outside the scope of the Operational stage.				
G98	SSD10447	C5	OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN	The Applicant must prepare an Operational Environmental Management Plan (OEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	Record	<p>10/07/2023: Record sighted:</p> <ul style="list-style-type: none"> <li>- Remondis (2 June 2022) Integrated Management Plan, Tomago Resource Recovery Facility.</li> </ul> <p>Record sighted:</p> <ul style="list-style-type: none"> <li>- DPE (2 August 2022) Operational Environmental Management Plan for Remondis Resource Recovery Facility Tomago (Condition C5 of SSD-10447). The letter acknowledged OEMP and its subplans (Energy from Waste Management Plan, Water Management Plan, and Air Quality Management Plan). DPE letter also states that the document contains the information required by the conditions of approval, documents were prepared in consultation with the EPA and Council, where required.</li> </ul>				

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G99	SSD10447	C6	OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN	As part of the OEMP required under condition C5 of this consent, the Applicant must include the following:	Record	10/07/2023: Record sighted: - Remondis (2 June 2022) Integrated Management Plan, Tomago Resource Recovery Facility. Provided in Section 6 and Table 2.				
				(a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Record	10/07/2023: Record sighted: - Remondis (2 June 2022) Integrated Management Plan, Tomago Resource Recovery Facility. Provided in Section 15 and 16				
				(b) describe the procedures that would be implemented to:	Record	10/07/2023: Record sighted: - Remondis (2 June 2022) Integrated Management Plan, Tomago Resource Recovery Facility. Provided in Section 15 and 16				
				(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;	Record	10/07/2023: Record sighted: - Remondis (2 June 2022) Integrated Management Plan, Tomago Resource Recovery Facility. Provided in Section 15				
				(ii) receive, handle, respond to, and record complaints;	Record	10/07/2023: Record sighted: - Remondis (2 June 2022) Integrated Management Plan, Tomago Resource Recovery Facility. Provided in Section 15				
				(iii) resolve any disputes that may arise;	Record	10/07/2023: Record sighted: - Remondis (2 June 2022) Integrated Management Plan, Tomago Resource Recovery Facility. Provided in Section 15				
				(iv) respond to any non-compliance;	Record	10/07/2023: Record sighted: - Remondis (2 June 2022) Integrated Management Plan, Tomago Resource Recovery Facility. Provided in Section 16				
				(v) respond to emergencies; and	Record	10/07/2023: Record Sighted: - Remondis (11 March 2022) Tomago Resource Recovery Facility Emergency Response Management Plan - Remondis (22 March 2022) Pollution Incident Response Management Plan, Tomago Resource Recovery Facility				
(c) include the following environmental management plans:	Record	10/07/2023: Record Sighted; - Remondis (27 June 2022) Energy from Waste Management Plan – Eligible Fuels. This documents are separate management plans referenced in OEMP/Integrated Management Plan								
(i) Energy from Waste Management Plan (see condition B8);	Record	10/07/2023: Record Sighted; - Remondis (14 July 2022 revised in September 2023) Tomago Resource Recovery Facility and Truck Parking Depot Water Management Plan. This documents are separate management plans referenced in OEMP/Integrated Management Plan								
(ii) Water Management Plan (see condition B26); and	Record	10/07/2023: Record Sighted; - Remondis (June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. This documents are separate management plans referenced in OEMP/Integrated Management Plan								
(iii) Air Quality Management Plan (see condition B36).	Record	10/07/2023: Record Sighted; - Remondis (June 2022) Resource Recovery Facility and Truck Parking Depot - Air Quality and Odour Management Plan. This documents are separate management plans referenced in OEMP/Integrated Management Plan								
G100	SSD10447	C7	OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN	The Applicant must:	Record	10/07/2023: Record sighted: - DPE (2 August 2022) Operational Environmental Management Plan for Remondis Resource Recovery Facility Tomago (Condition C5 of SSD-10447). The letter acknowledged OEMP and its subplans (Energy from Waste Management Plan, Water Management Plan, and Air Quality Management Plan). DPE letter also states that the document contains the information required by the conditions of approval, documents were prepared in consultation with the EPA and Council, where required. - Newcert (1 June 2022) Occupation Certificate 21-057-OC1 - Newcert (3 August 2022) Occupation Certificate 21-057-OC2				
				(a) not commence operation until the OEMP is approved by the Planning Secretary; and	Record	10/07/2023: Record sighted: - Remondis (2 June 2022) Integrated Management Plan, Tomago Resource Recovery Facility. Interview: - Remondis (EL) confirmed that Remondis (2 June 2022) Integrated Management Plan, Tomago Resource Recovery Facility is the one submitted and approved by DPE on 2 Aug 2022 and currently implemented.				
				(b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).						

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								Compliant	Non-Compliant	Not Triggered
G101	SSD10447	C8	REVISION OF STRATEGIES, PLANS AND PROGRAMS	Within three months of:	Record	10/07/2023: Interview: Remondis (EL) confirmed this has not triggered since operation commenced in August 2022.				
				(a) the submission of a Compliance Report under condition C14;	Record	10/07/2023: Interview: Remondis (EL) confirmed this has not triggered since operation commenced in August 2022.				
				(b) the submission of an incident report under condition C10;	Record	10/07/2023: Interview: Remondis (EL) confirmed no notifiable incidents occurred. DPE was consulted about the hotload incident.				
				(c) the submission of an Independent Audit under condition C16;	Record	This is the first Independent Audit.				
				(d) the approval of any modification of the conditions of this consent; or	Record	10/07/2023: Interview: Remondis (EL) confirmed no modification was made.				
				(e) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing of the outcomes of any review.	Record	10/07/2023: Interview: Remondis (RM) confirmed no direction has been received from Planning.				
G102	SSD10447	C9	REVISION OF STRATEGIES, PLANS AND PROGRAMS	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review required under condition C8, or such other timing as agreed by the Planning Secretary. <i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i>	Record	10/07/2023: Interview: Remondis (EL) confirmed the Energy to Waste Management Plan has been updated to the Portal after EPA comments have been incorporated. Record sighted: - EPA email to Remondis (18 May 2022) pertaining EPA response to review of energy from waste management plan - Remondis email to EPA (27 June 2022). The email provided EPA with the updated energy from waste management plan and also asked the following: "There are two potential ways forward from here in managing the review: 1. REMONDIS awaits your feedback and then lodges this in the State Major Project Planning Portal 2. REMONDIS can lodge the plan as drafted in the portal and then list the NSW EPA as a referral agency." - DPE (2 August 2022) Operational Environmental Management Plan for Remondis Resource Recovery Facility Tomago (Condition C5 of SSD-10447). The letter acknowledged OEMP and its subplans (Energy from Waste Management Plan, Water Management Plan, and Air Quality Management Plan) submitted on 2 June 2022. DPE letter also states that the document contains the information required by the conditions of approval, documents were prepared in consultation with the EPA and Council, where required.  Interview: Remondis (PW) stated that Energy from Waste operation has not commenced yet.	This item is considered as non-compliant because evidence of submission of the revised Energy to Waste Management Plan within 6 weeks of revision (27 June 2023) was unable to be sighted. It is noted that the earlier version of the Plan was provided to DPE. It is also noted that the Energy from Waste operation has not commenced at the time of the Audit.  <b>Recommendation: The most recent Energy to Waste Management Plan must be submitted to DPE.</b>			
G103	SSD10447	C10	Incident Notification, Reporting and Response	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.	Record	10/07/2023: Interview: Remondis (EL) confirmed no notifiable incidents occurred. DPE was consulted about the hotload incident (verbally) which occurred on 16 Feb 2023. Based on the information provided by Remondis, DPE stated that this incident was not reportable and hence, was not notified in writing.	<b>Recommendation: If there is uncertainty on whether an incident requires notification to DPE, it would be prudent to notify this to DPE. Notification must be conducted in writing in accordance with the consent conditions. All incidents that require notification to EPA will need to be notified to DPE.</b>			
G104	SSD10447	C11	Non-Compliance Notification	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	Record	10/07/2023: Interview: - Remondis (RM) confirmed no non-compliance has been aware.				
G105	SSD10447	C12	Non-Compliance Notification	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Record	10/07/2023: Interview: - Remondis (RM) confirmed no non-compliance has been aware.				
G106	SSD10447	C13	Non-Compliance Notification	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Record	Noted				
G107	SSD10447	C14	Compliance Reporting	Within three months after the first year of commencement of operation of the development, and in the same month each subsequent year (or such other timing as agreed by the Planning Secretary), the Applicant must submit a Compliance Report to the Planning Secretary reviewing the environmental performance of the development to the satisfaction of the Planning Secretary. Compliance Reports must be prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2020) and must also:	Record	First compliance report is due in November 2023				
				(a) identify any trends in the monitoring data over the life of the development;	Record	First compliance report is due in November 2023				
				(b) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and	Record	First compliance report is due in November 2023				
			(c) describe what measures will be implemented over the next year to improve the environmental performance of the development.	Record	First compliance report is due in November 2023					
G108	SSD10447	C15	Compliance Reporting	The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Planning Secretary and notify the Planning Secretary in writing at least seven days before this is done.	Record	First compliance report is due in November 2023				

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								Compliant	Non-Compliant	Not Triggered
G109	SSD10447	C16	Independent Audit	<p>Within one year of the commencement of operation of the development, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must:</p> <p>(a) be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020)</p> <p>(b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and</p> <p>(c) be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary).</p>	Record	The operation commenced in August 2023, hence the Audit was conducted within one year of the operation commencement.				
					Record	10/07/2023: Record sighted: - Department of Planning and Environment (13/6/2023) Remondis Resource Recovery Facility Tomago (SSD-10447) Auditor Endorsement Request, which provides approval of the current Audit team.				
					Record	This item is not yet triggered for the current audit.				
G110	SSD10447	C17	Independent Audit	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must:</p> <p>(a) review and respond to each Independent Audit Report prepared under condition C16 of this consent;</p> <p>(b) submit the response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations;</p> <p>(c) implement the recommendations to the satisfaction of the Planning Secretary; and</p> <p>(d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before this is done.</p>	Record	This item is not yet triggered for the current audit.				
					Record	This item is not yet triggered for the current audit.				
					Record	This item is not yet triggered for the current audit.				
					Record	This item is not yet triggered for the current audit.				
G111	SSD10447	C18	Monitoring and Environmental Audits	<p>Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&amp;A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing.</p> <p><i>Note: For the purposes of this condition, as set out in the EP&amp;A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i></p>	Record	Noted, and is reviewed in relevant conditions associated with monitoring.				
G112	SSD10447	C19	ACCESS TO INFORMATION	<p>At least 48 hours before the commencement of construction of the development until the completion of all works under this consent (or such other time as agreed by the Planning Secretary), the Applicant must:</p> <p>(a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p>	Record	10/07/2023: Record sighted: - The project website ( <a href="https://www.remondis-australia.com.au/locations/nsw/remondis-tomago-rf">https://www.remondis-australia.com.au/locations/nsw/remondis-tomago-rf</a> ).				
				(i) the documents referred to in condition A2 of this consent;	Record	10/07/2023: Record sighted: - SSD, written correspondence, EIS and RTS were unable to be sighted in the project website provided ( <a href="https://www.remondis-australia.com.au/locations/nsw/remondis-tomago-rf">https://www.remondis-australia.com.au/locations/nsw/remondis-tomago-rf</a> ).	This item is considered non-compliant as the EIS, RTS, or any correspondence with DPE are not yet included in the project website.			
				(ii) all current statutory approvals for the development;	Record	10/07/2023: Record sighted: - SSD was not sighted the project website.				
				(iii) all approved strategies, plans and programs required under the conditions of this consent;	Record	10/07/2023: Record sighted: The following documents were sighted in the project website: - Pollution Incident Response Management Plan - Air Quality Management Plan - Water Management Plan - Integrated Management Plan - Energy from Waste Management Plan - Long Term Environmental Management Plan				
				(iv) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent;	Record	10/07/2023: Record sighted: - Groundwater results from March 22 to March 23 were sighted in Remondis website.				
				(v) 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;	Record	10/07/2023: Record sighted: - Groundwater results from March 22 to March 23 were sighted in Remondis website.				
				(vi) a summary of the current stage and progress of the development;	Record	10/07/2023: Record sighted: - The project is already operational. Website provides services.				
				(vii) contact details to enquire about the development or to make a complaint;	Record	10/07/2023: Record sighted: - Environmental complaint line is provided on the Remondis website.				
				(viii) a complaints register, updated monthly;	Record	10/07/2023: Record sighted: - Complaint register was sighted in Remondis website.				
				(ix) the Compliance Report of the development;	Record	Compliance report has not been conducted.				
				(x) audit reports prepared as part of any Independent Audit of the development and the Applicant's response to the recommendations in any audit report;	Record	This is the first Independent Audit.				
				(xi) any other matter required by the Planning Secretary; and	Record	No other matter has been identified to require inclusion in the website.				
				(b) keep such information up to date, to the satisfaction of the Planning Secretary.	Record	Review of the website indicates the information is up to date.				

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<b>Appendix 2 Applicant's Management and Mitigation Measures</b>										
G113	SSD10447	Appendix 2	Waste	<ul style="list-style-type: none"> <li>Waste management and minimisation will form part of the induction program (which includes environmental due diligence training). All Project and site personnel will be trained in the requirements of this document including minimising wastes, recognising which types of materials are recyclable and their obligations to use recycling facilities provided on site;</li> <li>Clearly assign and communicate responsibilities to ensure that those involved in the construction are aware of their responsibilities in relation to the waste management plan;</li> <li>Engage and educate personnel on how the various elements of the waste management plan will be implemented;</li> <li>Specific locations for waste management (e.g. sorting area locations, recycling bin locations, material stockpile locations) will be established on site and signposted appropriately;</li> <li>Waste management areas will be adequately managed to prevent sediment runoff and dust generation;</li> <li>Construction Method Statements (CMS) will include practices to minimise waste generation and to maximise recycling and reuse of materials including oils, greases, lubricants, timber, glass, and metal;</li> <li>Packaging minimisation and reuse initiatives will be implemented as part of the procurement;</li> <li>Development of an unexpected finds environmental procedure should any contamination be found during construction works;</li> <li>Spill kit to be present on site in the case of any fuel leaks of plant and equipment during the construction phase of the development;</li> <li>Segregated waste disposal containers for the collection and recycling/disposal of all waste streams generated during the construction and operation phases will be provided onsite. Waste disposal containers will have clear signage and instructions for use to avoid crosscontamination. No rubbish shall be disposed of on site;</li> <li>Waste will be disposed to an appropriate licensed facility. A Waste Management Register of all waste collected for disposal and / recycling, including amounts, data and time and details and location of disposal will be maintained at all times;</li> <li>All waste being transported off site must be covered. The transportation must be appropriately licensed to carry that material;</li> <li>Storage of all hazardous substances and dangerous goods will be in accordance with SDS requirements in a bunded area. Solid and hazardous wastes will be contained and separated from inert waste;</li> <li>Any hazardous will be managed and handled by an appropriately licensed contractor and transported for disposal to a licensed facility approved site;</li> <li>Any material contaminated by spills i.e. fuel, oil, lubricants etc., including empty fuel, oil and chemical containers, will be stored in a sealed secure container within a bunded area and will be transported to a waste disposal site approved by the NSW EPA to accept such material;</li> <li>Incompatible wastes will not be mixed;</li> <li>Storage areas would be located away from waterways and the stormwater system;</li> <li>Biodegradable products will be used wherever practicable;</li> <li>Regular collection of wastes will ensure air emissions are at a satisfactory level. Inappropriate waste and wastewater management systems will be regularly inspected and audited;</li> <li>Conduct regular litter patrols to ensure litter is effectively controlled on site;</li> </ul>	Record, observation	<p>10/07/2023: Observation: - The waste types observed onsite were included in the EPL (e.g. mine waste (contaminated soil in drums, oily rags, waste oil), cardboard, plastic, coffee pods, glass, timber. - Waste segregation was observed. - Spill kits were observed. - No trucks were observed to be coming or leaving the site during the audit. - Waste storage was observed to be in paved areas. - Chemicals were observed to be present in paved and generally bunded (see Item G76). - Monthly inspections are conducted by management team and include waste management.</p> <p>Interviewee (PW) stated that no building waste has been received onsite. No asbestos waste is received onsite.</p> <p>Sighted: Weighbridge record through Clearweigh for June 2023, which indicated the following waste streams were received and disposed of: cages, ferrous iron or steel, food and garden, glass, mixed hydrocarbon, mixed waste, Nespresso reject, Nespresso cage, non-ferrous metals, oil, paper or cardboard, plastic, plastic film, timber pallets.</p>				
G114	SSD10447	Appendix 2	Air quality	<ul style="list-style-type: none"> <li>All waste tipping, sorting, processing and storage will occur indoors at all times;</li> <li>Implement a waste acceptance evaluation procedure to ensure all waste received on site meets the relevant criteria;</li> <li>Use odour neutralisers;</li> <li>Availability of spill kits to allow for prompt containment of spills which could be odorous;</li> <li>Daily odour survey observations around the boundary of the site;</li> <li>Work procedures in the event of any particularly odorous loads (e.g. Use of odour neutraliser, identifying waste source and investigating possibility of diverting to another waste facility);</li> <li>Additional odour control system medium on-site at all times (e.g. Additional activated carbon to be stored on site).</li> </ul>	Observation	<p>10/07/2023: Observation: - All waste tipping, sorting, processing and storage were observed to be indoor. - Remondis (PW) stated that odour neutraliser was not needed. Observation indicated that there was no unacceptable odour during the audit. - Spill kits were observed.</p> <p>Record sighted: - Air Quality and Odour Management Plan, which covers odour (see G67).</p> <p>Interview: - Remondis (PW) stated that activated carbon filter was present in the vicinity of the coffee processing area.</p> <p>7/9/2023: Record sighted: - Daily Odour Assessment Form for 28 August 2023 to 1 September 2023.</p>				
G115	SSD10447	Appendix 2	Greenhouse gas	<ul style="list-style-type: none"> <li>Minimise the use of fuel by selecting fuel efficient plant and equipment, operating vehicles and machinery in a fuel-efficient manner e.g. turning off idling equipment, and selecting construction techniques that utilise lower amounts of fuel;</li> <li>Implement a maintenance plan for all fuel and electrically powered equipment;</li> <li>Implement energy conservation practices by all staff (which can be enforced through appropriate training);</li> <li>Use solar panels.</li> </ul>	Record, observation	<p>10/07/2023: Observation: - All waste tipping, sorting, processing and storage were observed to be indoor. - Remondis (PW) stated that odour neutraliser was not needed. Observation indicated that there was no unacceptable odour during the audit. - Spill kits were observed.</p> <p>Sighted: - Air Quality and Odour Management Plan, which covers odour (see G67).</p> <p>Interview: - Remondis (PW) stated that activated carbon filter was present in the vicinity of the coffee processing area.</p> <p>Record sighted: - Asset register record for weekly Australian Bale Press - Monthly Australian Bale Press - 3 monthly Bale Convenience</p>				
G116	SSD10447	Appendix 2	Noise and vibration	<ul style="list-style-type: none"> <li>Avoid the coincidence of noisy plant working simultaneously close together would result in reduced noise emissions;</li> <li>Equipment which is used intermittently is to be shut down when not in use;</li> <li>Where possible, equipment with directional noise emissions should be oriented away from sensitive receivers;</li> <li>Regular compliance checks on the noise emissions of all plant and machinery used for the proposal would indicate whether noise emissions from plant items were higher than predicted. This also identifies defective silencing equipment on the items of plant;</li> <li>Non-tonal reversing alarms should be used on all items of plants and heavy vehicles used for construction;</li> <li>Existing doors are closed during the waste processing whenever practicable (note this measure is not required to achieve the Project Noise Trigger Levels for the project and is at the discretion of the proponent).</li> </ul>	Record, observation	<p>10/07/2023: Observation: - No unacceptable noise was observed at the time of Audit. - No complaint relating to noise was observed.</p> <p>Interview: - Remondis (PW) stated that non-tonal reversing alarms are used on all plant and heavy vehicles.</p>				

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G117	SSD10447	Appendix 2	Biodiversity (construction)	<ul style="list-style-type: none"> <li>The clearing boundary should be clearly marked to avoid removal of additional native vegetation.</li> <li>Priority will be given during construction to avoid any inadvertent impact to significant biodiversity values within the study area. Avoidance measures should include the following: <ul style="list-style-type: none"> <li>All material stockpiles, vehicle parking and machinery storage will be located within cleared areas proposed for clearing, and not in areas of native vegetation that are to be retained;</li> <li>Implementation of temporary stormwater controls during construction and to ensure that discharges outside the development footprint are consistent with existing conditions and do not impact the stream located within the site;</li> </ul> </li> <li>Any animals injured during construction should be taken immediately to a Vet for treatment. Any animals suspected to require rehabilitation would be delivered post-veterinary care to an appropriate animal rehabilitator;</li> <li>The following measures should be implemented to prevent exotic plant material from entering/exiting the development area: <ul style="list-style-type: none"> <li>No imported/exported material to be permitted unless it has been inspected and confirmed to be free of dirt and mud which may contain weed seeds and vegetative material such as bulbs, root fragment, tubers or rhizomes;</li> <li>Vehicles and machinery to be clean of soils, vegetation and seeds that have been brushed off or washed down prior to entering the study area; and</li> </ul> </li> </ul>	Record, observation	10/07/2023: Interview: Remondis (PW) stated that the site had been cleared (and mostly developed and paved) at the time of construction. Minimal construction work occurred.  Observation: - All materials, vehicles and machines were located within paved areas.				
G118	SSD10447	Appendix 2	Biodiversity (operation)	<ul style="list-style-type: none"> <li>Vehicles should not drive off the designated parking area into vegetation within the study area to reduce impact to resident fauna and flora within the study area during the operations phase;</li> <li>Any animals injured during operations should be taken immediately to the Motto Farm Veterinary Hospital for treatment. Any animals suspected to require rehabilitation would be delivered post-veterinary care to an appropriate animal rehabilitator associated with Wildlife in Need of Care Phone 1300 946 295);</li> <li>The following measures should be implemented to prevent exotic plant material from entering/exiting the study area: <ul style="list-style-type: none"> <li>No imported/exported material to be permitted unless it has been inspected and confirmed to be free of dirt and mud which may contain weed seeds and vegetative material such as bulbs, root fragment, tubers or rhizomes;</li> <li>Vehicles and machinery to be clean of soils, vegetation and seeds that have been brushed off or washed down prior to entering the study area;</li> <li>A clean down register to be maintained at the entry of the study area; and</li> <li>Trucks are not to drive off the designated parking area onto vegetation within the site;</li> </ul> </li> <li>As a part of maintenance within the study area any high threat weeds known to occur will be controlled in accordance with appropriate DPI guidelines. Guidelines for the treatment of high threat weeds can be sourced within the DPI website;</li> <li>Any artificial lighting used for security at night should be angled/directed downwards to avoid excessive light pollution affecting adjacent habitat.</li> </ul>	Record, observation	10/07/2023: Observation: - The majority of the site was observed to be paved, with the exception of some garden beds. - Vehicles were observed to be in paved areas. - External lighting is directed downwards.  Interview: - Remondis (PW) stated the only material that was imported to the site during construction only comprised DGB. - No injured animals had been encountered.				
G119	SSD10447	Appendix 2	Heritage	<ul style="list-style-type: none"> <li>All on-site personnel are to be made aware of their obligations under the National Parks and Wildlife Act 1974, this includes protection of Aboriginal sites and the reporting of any new Aboriginal, or suspected Aboriginal, heritage sites. This may be done through an onsite induction or other suitable format;</li> <li>All on-site personnel are to be made aware of their obligations under the NSW Heritage Act 1977, including the reporting of any historic, or suspected historic material. This may be done through an onsite induction or other suitable format;</li> <li>In the unlikely event that Aboriginal or suspected Aboriginal archaeological material is uncovered during the development, then works in that area are to stop and the area cordoned off. The project manager is to contact the heritage consultant to make an assessment as to whether the material is classed as Aboriginal object/s under the National Parks and Wildlife Act and advise on the required management and mitigation measures. Works are not to re-commence in the cordoned off area until heritage clearance has been given and/or the required management and mitigation measures have been implemented;</li> </ul>	Record	10/07/2023: - Record Sighted: - Remondis Tomago - Aboriginal Cultural Heritage Awareness Training  Interview: - No Aboriginal or suspected Aboriginal archaeological material has been uncovered to date.				

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G120	SSD10447	Appendix 2	Bushfire	<ul style="list-style-type: none"> <li>At the commencement of building works and in perpetuity, manage an inner protection area (IPA) for the entire property as outlined within Appendix 4 of Planning for Bush Fire Protection (2019) and the NSW Rural Fire Service's Standards for Asset Protection Zones;</li> <li>Undertake landscaping in accordance with Appendix 4 of Planning for Bush Fire Protection (2019) and manage and maintain in perpetuity;</li> <li>Property owner and occupants to familiarise themselves with the relevant bushfire preparation and survival information provided by the New South Wales Rural Fire Service;</li> <li>Implement emergency evacuation plans prepared for the workplace with specific consideration of bushfire evacuation and management planning;</li> </ul>	Record, observation	<p>10/07/2023: Record sighted: - Remondis (29 March 2023, ref: 022-HSEQ-MP002) Bushfire response program) is in the site's Emergency Management Plan.</p> <p>Observation: -The site is mostly paved, with only small garden beds.</p>				
G121	SSD10447	Appendix 2	Contamination	<ul style="list-style-type: none"> <li>Implement remedial measures as detailed in the Remedial Action Plan,</li> <li>Prepare and implement a Long-Term Environmental Management Plan.</li> </ul>	Record, observation	<p>10/07/2023: - GHD (20 May 2022) Site Audit Report, with LTEMP attached.</p>				
G122	SSD10447	Appendix 2	Chemicals and fuels and pollution incidents	<ul style="list-style-type: none"> <li>All liquid wastes, chemicals and fuels to be handled and stored under cover in bunded areas;</li> <li>All staff working in areas with liquid wastes to be properly trained and wear PPE at all times;</li> <li>MSDS sheets, where available, to be readily accessible for all chemicals on site;</li> <li>Chemical spill kits and "absorbent sausages" to be kept on site and readily accessible near liquid waste and chemical storage;</li> <li>Firefighting equipment to be accessible and regularly inspected.</li> <li>The area for loading and off-loading drill muds will occur fully indoors within the designated bunded area of Building 2;</li> <li>Tankers will be provided with automatic shut-off mechanisms;</li> <li>Valves will be kept closed unless manually opened during transfer;</li> <li>Storage tanks will be provided with overflow protection and alarms;</li> <li>Leak detection tests on tanks, distribution lines and seals will be conducted regularly;</li> <li>The 2 x 50,000L storage tanks will be internally bunded or will be provided with secondary containment bunding such that the compound (area where the two tanks are stored) will contain a spill equivalent to the volume of one tank (50,000L);</li> <li>The floors of bulk storage facilities will be designed to withstand the hydrostatic pressure exerted when tanks are full;</li> <li>The containment system will be compatible with the liquid being stored and provide an impervious barrier to prevent spills from discharging outside the containment system;</li> <li>Any pipes connected to the storage tanks will be located over the containment system. If a pipe passes through a wall, the joint should be sealed to prevent leakage;</li> <li>All fixed tanks will be provided with a suitable overflow system that discharges to an area within the bund wall or to a collection or holding point;</li> <li>Any valve used for draining a storage compound should be located outside the bund wall;</li> <li>The valve should have clear open and closed positions and be compatible with the liquid contained. The valve should normally be closed except during drainage;</li> <li>Storage tanks should be fitted with level indicators. Where the level inside the tank is not continuously visible to the person filling the tank, a high-level alarm should be fitted to prevent overflow;</li> <li>All tanks and storage compounds will be inspected and maintained regularly, and the tanks' integrity should be tested at least every 5 years;</li> <li>Tanks will be properly labelled and have Material Safety Data Sheets available in the work area;</li> <li>Vehicles will move between storage areas in a manner that prevents the tracking of contamination from one area to another;</li> <li>All storage areas will be secured against unauthorised entry;</li> <li>Adequate supplies of spill response equipment should be maintained in accessible locations. These are to be checked on a weekly basis and replenished with new supplies immediately after use;</li> <li>Contaminated water and other waste (spill materials) from the clean-up of spills must be collected and disposed of in accordance with EPA requirements;</li> <li>A spill response plan will be developed as part of the Operational Environmental Management Plan for the site, implemented, reviewed and updated as required;</li> <li>Spill response training and drills will be conducted regularly or as appropriate;</li> <li>The spread of the spill should be contained, and all spilled liquids should be recovered immediately.</li> </ul>	Record, observation	<p>10/07/2023: Observation: - See item G76 on storage of chemicals. - Chemical spill kits were available near chemical storage. - Firefighting equipment was sighted. - The diesel tank has a plate stating compliance to AS 1692-2006 and AS1657-1992 and AS1940-2017 UL 142 &amp; ULC-S601.</p> <p>Interview: Remondis (PW) stated: - No drilling muds have been received onsite. - Tankers have automatic shut-off mechanisms. - Storage tanks have bunds and were built in accordance with Australian Standards. - Leak detection has not occurred as the facility is new. - No underground pipes are present. - The waste oil tank is fitted with alarm. The levels can be viewed online with GES online system. GES was sighted. - Waste types were observed to be segregated inside the buildings.</p> <p>Record sighted: - ChemAlert, which provides a list of chemicals stored onsite. Examples of SDS were sighted. - Induction material includes traffic management requirement, which requires that different waste streams need to follow colour-coded transport route and door number. - Tool Box Topic #28 Spill Control. Tool Box Topic #28 Spill Control for 11, 12, 13, 14, and 20 July 2023 were provided following the Site visit.</p>	<p><b>Recommendation: Signage should be provided for all different waste types</b></p>			

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G122 continue	SSD10447	Appendix 2	Chemicals and fuels and pollution incidents	<ul style="list-style-type: none"> <li>The spilled liquid and other clean-up waste should be properly disposed of;</li> <li>Water used for cleaning up and decontaminating spills should not be allowed to enter stormwater drains or watercourses;</li> <li>Spills should be covered and protected from stormwater runoff during rainfall to the extent that it does not compromise clean-up activities;</li> <li>An emergency management plan to deal with significant incidents will be implemented, reviewed and updated as required;</li> <li>At the detailed design stage, sufficient space between bund walls, storage areas and other structures should be provided to allow access during emergencies;</li> <li>Employees will be trained in emergency response procedures, including spill clean-up procedures;</li> <li>Response equipment should be provided to allow emergencies to be dealt with immediately;</li> <li>Emergency drills using the emergency response plan should be undertaken at least annually;</li> <li>Spilled liquids and other wastes from the clean-up should be collected and properly disposed of;</li> <li>Responsible individuals should be designated to oversee and enforce control;</li> <li>The site will maintain adequate measures to contain contaminated firewater on-site;</li> <li>The site's stormwater isolation valve to be activated to block the stormwater drain outlets from the site;</li> <li>Oil and oily water is to be pumped into designated holding tanks. These tanks are contained within the fully banded area, with good ventilation;</li> <li>Tanks will be provided with suitable vents to enable the safe discharge of displaced volatile air emissions during loading and unloading; should have a vapour disposal or recovery system installed where necessary;</li> <li>Storage tanks are located in a tank farm that will have bunding for at least 100% of the largest tank;</li> <li>Package stores containing chemicals that emit volatile gases should be provided with adequate natural or mechanical ventilation;</li> <li>All containers storing liquids / waste liquids should be sealed (i.e. lids sealed and bungs secured);</li> <li>All containers are to be stored in accordance with their waste classification codes;</li> <li>All areas to have placarding and signage to facilitate identification and management of storages;</li> <li>Package stores should be located with adequate separation from boundaries, ignition sources and protected places;</li> <li>Stored chemicals and waste materials should be confined to designated areas;</li> <li>All stores that contain liquid chemicals should be provided with suitable bunding and containment;</li> <li>The capacity of the spillage containment compound should be adequate to retain spillage;</li> <li>Spill containment areas should be designed so incompatible material does not drain to the same area;</li> <li>Drums and other containers should be stored (stacked) in such a manner and location that if the drums and other containers are ruptured or toppled, the contents will not spill outside the containment structure;</li> <li>All products should be coded and labelled, and Material Safety Data Sheets should be made available in the work area;</li> <li>Areas for decanting and off-loading liquid chemicals will be done indoors within the fully banded area of the Hazardous Waste Recycling Facility;</li> <li>Adequate natural or mechanical ventilation for package-filling operations should be provided, and if necessary the vents should be fitted with filters to minimise air emissions;</li> <li>Tanks should be located with adequate separation distances from boundaries, ignition sources and protected places;</li> <li>Material that tanks are made of should be compatible with chemicals to be stored;</li> <li>Oil storage tanks will be located away from the containment bunds, so any lateral spill from the tank would be contained inside the containment walls or hit a suitable splatter shield;</li> <li>All storage tanks should be fitted with level indicators. Where the level inside the tank is not continuously visible to the person filling the tank, a high-level alarm should be fitted to prevent overflow;</li> <li>Tankers that will visit the site to pump out the drain drum and oil filter drum will be provided with automatic shut-off mechanisms;</li> <li>Shut-off valves used in the transfer of liquids should be of the quick-closing type;</li> <li>Hatches, manholes or covers on all tankers should be kept closed, except during loading and unloading operations;</li> <li>Drums or containers to be used to catch any drips from hoses before or after decanting;</li> <li>Transfer pumps should be provided with emergency shut-down devices;</li> <li>Hoses should be purged before uncoupling;</li> <li>Overflow protection devices should be regularly inspected;</li> <li>Forklift drivers transporting IBC's or other containers should be appropriately trained;</li> <li>Regular inspections should be undertaken for losses or leaks, and valves, pumps, couplings and seals should be maintained regularly;</li> <li>Areas for storing scheduled liquid chemical wastes will be secured, roofed and walled, have impermeable floors and be adequately ventilated;</li> <li>Empty containers should be washed, rinsed or chemically treated and sealed before storage or disposal;</li> <li>Labels of containers should be retained until the containers are washed and rinsed;</li> <li>Containers not for reuse should be rendered safe and be punctured or crushed;</li> <li>Accurate records of all wastes stored should be kept to ensure early disposal;</li> <li>Employees should be trained in appropriate waste control and disposal procedures.</li> </ul>	Record, observation	<p>10/07/2023:</p> <p>Interview:</p> <ul style="list-style-type: none"> <li>Remondis (PW) stated that spills will be cleaned using spill kits, not water.</li> </ul> <p>Observation:</p> <ul style="list-style-type: none"> <li>Sufficient area was observed onsite to allow access during emergencies.</li> <li>The diesel tank has a plate stating compliance to AS 1692-2006 and AS1657-1992 and AS1940-2017 UL 142 &amp; ULC-S601.</li> <li>All containers holding liquids were sealed.</li> <li>Packages were stored with adequate separation from site boundaries.</li> <li>See G76</li> <li>SDS folder in Building 2.</li> </ul> <p>Record sighted:</p> <ul style="list-style-type: none"> <li>Tool Box Topic Spill Control.</li> <li>ChemAlert, which provides a list of chemicals stored onsite. Examples of SDS were sighted.</li> <li>Induction material includes traffic management requirement, which requires that different waste streams need to follow colour-coded transport route and door number.</li> </ul> <p>10/07/2023:</p> <p>Interview:</p> <ul style="list-style-type: none"> <li>Remondis (PW) stated that decanting area is within Building 2 (fully paved). The buildings were all banded..</li> <li>The waste oil tank is fitted with alarm. The levels can be viewed online with GES online system. GES was sighted.</li> <li>All static equipment onsite has e-stop.</li> </ul> <p>Observation:</p> <ul style="list-style-type: none"> <li>The buildings were appropriately ventilated. No evidence of unacceptable odour was noted.</li> <li>Tanks were located with adequate separation to site boundaries.</li> <li>No tankers were observed at the time of audit.</li> <li>Bin washing was observed. Water from the washing is reportedly collected and treated in the oily water separator. Treated water and oil are disposed of offsite.</li> <li>Chemical containers were observed to be labelled.</li> </ul> <p>Record sighted:</p> <ul style="list-style-type: none"> <li>Operate A Forklift Assessment for a staff (signed off).</li> <li>Risk Assessment for Forklift for a staff (signed off).</li> <li>Forklift licence.</li> <li>Work Instructions for various waste streams.</li> </ul>				

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G123	SSD10447	Appendix 2	Fire safety	<ul style="list-style-type: none"> <li>Access for fire brigade vehicles and firefighters: <ul style="list-style-type: none"> <li>It has been noted by both BMG (2020) and Affinity Fire Engineering (2020) that emergency vehicle access around the northern end of Building 2 is not deemed to satisfy BCA cl. C2.4, in that the perimeter road is greater than 18 metres from the building in certain locations; and</li> </ul> </li> <li>Fire safety in waste facilities: <ul style="list-style-type: none"> <li>Building 1 will be fitted with ridgeline exhaust fans capable of extracting smoke at the rate of 18m3/s within 10 minutes of the fire reaching steady heat release;</li> <li>Building 1 will have a minimum 10mm high perimeter bund around the inside of the building;</li> <li>Building 2 will be fitted with ridgeline exhaust fans capable of extracting smoke at the rate of 17m3/s within 6 minutes of the fire reaching steady heat release;</li> <li>Building 2 will have a minimum 16mm high perimeter concrete bund around the inside of the building;</li> <li>Building 3 will be fitted with ridgeline exhaust fans capable of extracting smoke at the rate of 26m3/s that are interlocked with the fire alarm;</li> <li>Building 3 will have a minimum 5mm high perimeter concrete bund around the inside of the building;</li> <li>Internal stockpiles will be arranged to allow for six (6) metres unobstructed access around internal Internal stockpiles will have a maximum volume of 1000m3.</li> </ul> </li> <li>It is further recommended that REMONDIS : <ul style="list-style-type: none"> <li>Provide an emergency tipping area, such as the undeveloped areas on Site 21F, at least 10 metres from parked vehicles and within a 70 metre radius of hydrant FH5;</li> <li>Use portable infrared detectors to check for thermal hotspots;</li> <li>Install fixed infrared cameras with audible alarm at five (5) identified high fire load locations;</li> <li>Install automatic sprinkler system in Building 2;</li> <li>Building 2 will require the installation of 4 x 36m (DN19) fire hose reels adjacent personal access doors to ensure coverage of the building internal floor area;</li> <li>2A 60B(E) 9 kg powder fire extinguishers will be installed on all the vehicles working in the vicinity of the fire compartments;</li> <li>5 x 2A 60B(E) 9 kg powder fire extinguishers to be inside the recycling plant;</li> <li>Lithium batteries must be stored in accordance with the Dangerous Goods Code and AS/NZS 4681:2000 The storage and handling of Class 9 (miscellaneous) dangerous goods and articles; and</li> <li>Plastics will be removed on a regular basis to ensure that individual storage areas, no greater than 20m2 and 2 metres high, are separated from adjoining storages by no less than 2.4 metres.</li> </ul> </li> </ul>	Record, observation	<p>10/07/2023: Record sighted: - Newcert (3 August 2022) Occupation Certificate 21-057-OC2, which includes fire safety certificate.</p> <p>Interview: - Remondis (PW) stated batteries were stored in accordance with Dangerous Codes, separated from other waste streams.</p> <p>Observation: - Plastic bails were observed to be less than 2m high, but cover an area of &gt;20m<sup>2</sup>. Remondis (PW) stated that plastic waste is removed when they reach 1 container full. This amount is likely reaching 1 container, which requires removal.</p>																																																																
G124	SSD10447	Appendix 2	Visual impact	<ul style="list-style-type: none"> <li>Preferably plant native trees and large shrubs along the boundary to help screen the proposed development from future development of adjacent Lots;</li> <li>Ensure the proposed development is offset from the boundary to allow screen planting;</li> <li>Plant native trees along the road verge of 21D to reduce views to the proposed development from future development.</li> </ul>	Observation	<p>10/07/2023: Observation: - Trees have been planted around the truck parking area. - Trees were observed on the south-eastern boundary adjacent to the road. No planting space was available on the southern boundary.</p>																																																																
G125	SSD10447	Appendix 2	Emergency Response	<ul style="list-style-type: none"> <li>In the event of an emergency, the Emergency Plan prepared of the facility will be implemented.</li> <li>As per the Emergency Plan, in the event of a flood that has the potential to reach the site boundaries, the following actions are to be taken: <ul style="list-style-type: none"> <li>The facility is to stop receiving inbound product;</li> <li>Service/remove all bins and vessels wherever possible; and</li> <li>Send contents offsite to recycling/disposal destinations.</li> </ul> </li> <li>In the event the actions above cannot be carried out, the actions listed in table 4.3 of the Waste Minimisation and Management Plan (Version 4 dated 12/08/21) are to be implemented, relevant to the specific areas.</li> </ul> <p><b>Table 4.3. Emergency actions for flood at the site.</b></p> <table border="1"> <thead> <tr> <th>Material type</th> <th>Storage container type</th> <th>Emergency actions prior to PMF<sup>4</sup> event</th> </tr> </thead> <tbody> <tr> <td>E-waste</td> <td>3m<sup>3</sup> steel skip bin</td> <td>Move bin to 'Metal Recycling Area' (above PMF level)</td> </tr> <tr> <td>Lead acid batteries</td> <td>Pallets</td> <td>Store on pallet racking above PMF level (second row of racking)</td> </tr> <tr> <td>IBC storage containers</td> <td>IBCs</td> <td>Remove off-site and recycle so no waste held on site</td> </tr> <tr> <td>Residual paints / thinners</td> <td>Drums on pallets</td> <td>Store on pallet racking above PMF level (second row of racking)</td> </tr> <tr> <td>Empty aerosol containers</td> <td>240L bin or IBC</td> <td>Store on pallet racking above PMF level (second row of racking)</td> </tr> <tr> <td>Drum crusher</td> <td>Plant item only</td> <td>Leave in-situ</td> </tr> <tr> <td>Scrap metal</td> <td>7m<sup>3</sup> steel skip bin</td> <td>Move bin to 'Metal Recycling Area' (above PMF level)</td> </tr> <tr> <td>Hydraulic hoses</td> <td>20m<sup>3</sup> steel hook lift bin (plastic lined)</td> <td>Remove off-site and recycle so no waste held on site</td> </tr> <tr> <td>Residual waste</td> <td>20m<sup>3</sup> steel hook lift bin</td> <td>Remove off-site and recycle so no waste held on site</td> </tr> <tr> <td>Scales</td> <td>Plant item only</td> <td>Store on pallet racking above PMF level (second row of racking)</td> </tr> <tr> <td>Hydrocarbons</td> <td>Drums and IBCs</td> <td>Store on pallet racking above PMF level (second row of racking)</td> </tr> <tr> <td>Oil drum drain</td> <td>1,500L steel container</td> <td>Drain oil and store IBC on pallet racking above PMF level (second row of racking)</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Material type</th> <th>Storage container type</th> <th>Emergency actions prior to PMF<sup>4</sup> event</th> </tr> </thead> <tbody> <tr> <td>Oil filter drain</td> <td>1,500L steel container</td> <td>Drain oil and store IBC on pallet racking above PMF level (second row of racking)</td> </tr> <tr> <td>Existing tanks (I100 and I120)</td> <td>Sealed tanks</td> <td>Leave in-situ (sealed)</td> </tr> <tr> <td>Contaminated soil</td> <td>Drums and IBCs</td> <td>Store on pallet racking above PMF level (second row of racking)</td> </tr> <tr> <td>Containers and drums (with residual dangerous good residues) (N100)</td> <td>Drums and IBCs</td> <td>Store on pallet racking above PMF level (second row of racking)</td> </tr> <tr> <td>Pressure vessels</td> <td>6 m<sup>3</sup> steel skip bin</td> <td>Remove off-site and recycle so no waste held on site</td> </tr> <tr> <td>Fluorescent tubes</td> <td>3 m<sup>3</sup> steel skip bin</td> <td>Remove off-site and recycle so no waste held on site</td> </tr> </tbody> </table>	Material type	Storage container type	Emergency actions prior to PMF <sup>4</sup> event	E-waste	3m <sup>3</sup> steel skip bin	Move bin to 'Metal Recycling Area' (above PMF level)	Lead acid batteries	Pallets	Store on pallet racking above PMF level (second row of racking)	IBC storage containers	IBCs	Remove off-site and recycle so no waste held on site	Residual paints / thinners	Drums on pallets	Store on pallet racking above PMF level (second row of racking)	Empty aerosol containers	240L bin or IBC	Store on pallet racking above PMF level (second row of racking)	Drum crusher	Plant item only	Leave in-situ	Scrap metal	7m <sup>3</sup> steel skip bin	Move bin to 'Metal Recycling Area' (above PMF level)	Hydraulic hoses	20m <sup>3</sup> steel hook lift bin (plastic lined)	Remove off-site and recycle so no waste held on site	Residual waste	20m <sup>3</sup> steel hook lift bin	Remove off-site and recycle so no waste held on site	Scales	Plant item only	Store on pallet racking above PMF level (second row of racking)	Hydrocarbons	Drums and IBCs	Store on pallet racking above PMF level (second row of racking)	Oil drum drain	1,500L steel container	Drain oil and store IBC on pallet racking above PMF level (second row of racking)	Material type	Storage container type	Emergency actions prior to PMF <sup>4</sup> event	Oil filter drain	1,500L steel container	Drain oil and store IBC on pallet racking above PMF level (second row of racking)	Existing tanks (I100 and I120)	Sealed tanks	Leave in-situ (sealed)	Contaminated soil	Drums and IBCs	Store on pallet racking above PMF level (second row of racking)	Containers and drums (with residual dangerous good residues) (N100)	Drums and IBCs	Store on pallet racking above PMF level (second row of racking)	Pressure vessels	6 m <sup>3</sup> steel skip bin	Remove off-site and recycle so no waste held on site	Fluorescent tubes	3 m <sup>3</sup> steel skip bin	Remove off-site and recycle so no waste held on site	Record	<p>10/07/2023: Record sighted: - Remondis (11 March 2022) Tomago Resource Recovery Facility Emergency Response Management Plan.</p> <p>Interview: Remondis (PW) stated that no emergency has occurred.</p>				
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<b>Appendix 3 Incident Notification and Reporting Requirements</b>										
G126	SSD10447	Appendix 3.1	WRITTEN INCIDENT NOTIFICATION REQUIREMENTS	1. A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition C10 or, having given such notification, subsequently forms the view that an incident has not occurred.	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
G127	SSD10447	Appendix 3.2	WRITTEN INCIDENT NOTIFICATION REQUIREMENTS	2. Written notification of an incident must:	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
				(a) identify the development and application number;	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
				(b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
				(c) identify how the incident was detected;	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
				(d) identify when the applicant became aware of the incident;	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
				(e) identify any actual or potential non-compliance with conditions of consent;	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
				(f) describe what immediate steps were taken in relation to the incident;	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
				(g) identify further action(s) that will be taken in relation to the incident; and	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
G128	SSD10447	Appendix 3.3	INCIDENT REPORT REQUIREMENTS	3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
G129	SSD10447	Appendix 3.4	INCIDENT REPORT REQUIREMENTS	The Incident Report must include:	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
				(a) a summary of the incident;	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
				(b) outcomes of an incident investigation, including identification of the cause of the incident;	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
				(c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				
				(d) details of any communication with other stakeholders regarding the incident.	Record	10/07/2023: Interview: Remondis (RM) confirmed no reportable incidents have occurred since commencement of operation.				

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								Compliant	Non-Compliant	Not Triggered
Environmental Impact Statement (EIS)										
G130	EIS	Table 20.1	Summary of Mitigation Strategies for Waste	<ul style="list-style-type: none"> <li>Waste management and minimisation will form part of the induction program (which includes environmental due diligence training). All Project and site personnel will be trained in the requirements of this document including minimising wastes, recognising which types of materials are recyclable and their obligations to use recycling facilities provided on site;</li> <li>Clearly assign and communicate responsibilities to ensure that those involved in the construction are aware of their responsibilities in relation to the waste management plan;</li> <li>Engage and educate personnel on how the various elements of the waste management plan will be implemented;</li> <li>Specific locations for waste management (e.g. sorting area locations, recycling bin locations, material stockpile locations) will be established on site and signposted appropriately;</li> <li>Waste management areas will be adequately managed to prevent sediment runoff and dust generation;</li> <li>Construction Method Statements (CMS) will include practices to minimise waste generation and to maximise recycling and reuse of materials including oils, greases, lubricants, timber, glass, and metal;</li> <li>Packaging minimisation and reuse initiatives will be implemented as part of the procurement;</li> <li>Development of an unexpected finds environmental procedure should any contamination be found during construction works;</li> <li>Spill kit to be present on site in the case of any fuel leaks of plant and equipment during the construction phase of the development;</li> <li>Segregated waste disposal containers for the collection and recycling/disposal of all waste streams generated during the construction and operation phases will be provided onsite. Waste disposal containers will have clear signage and instructions for use to avoid cross-contamination. No rubbish shall be disposed of on site;</li> <li>Waste will be disposed to an appropriate licensed facility. A Waste Management Register of all waste collected for disposal and / recycling, including amounts, data and time and details and location of disposal will be maintained at all times;</li> <li>All waste being transported off site must be covered. The transportation must be appropriately licensed to carry that material;</li> <li>Storage of all hazardous substances and dangerous goods will be in accordance with SDS requirements in a bunded area. Solid and hazardous wastes will be contained and separated from inert waste;</li> <li>Any hazardous will be managed and handled by an appropriately licensed contractor and transported for disposal to a licensed facility approved site;</li> <li>Any material contaminated by spills i.e. fuel, oil, lubricants etc., including empty fuel, oil and chemical containers, will be stored in a sealed secure container within a bunded area and will be transported to a waste disposal site approved by the NSW EPA to accept such material;</li> <li>Incompatible wastes will not be mixed;</li> <li>Storage areas would be located away from waterways and the stormwater system;</li> <li>Biodegradable products will be used wherever practicable;</li> <li>Regular collection of wastes will ensure air emissions are at a satisfactory level. Inappropriate waste and wastewater management systems will be regularly inspected and audited;</li> <li>Conduct regular litter patrols to ensure litter is effectively controlled on site;</li> </ul>	Record, observation	See Item G113				
G131	EIS	Table 20.1	Summary of Mitigation Strategies for air quality	<ul style="list-style-type: none"> <li>All waste tipping, sorting, processing and storage will occur indoors at all times;</li> <li>Implement a waste acceptance evaluation procedure to ensure all waste received on site meets the relevant criteria;</li> <li>Use odour neutralisers;</li> <li>Availability of spill kits to allow for prompt containment of spills which could be odorous;</li> <li>Daily odour survey observations around the boundary of the site;</li> <li>Work procedures in the event of any particularly odorous loads (e.g. Use of odour neutraliser, identifying waste source and investigating possibility of diverting to another waste facility);</li> <li>Additional odour control system medium on-site at all times (e.g. Additional activated carbon to be stored on site).</li> </ul>	Observation	See Item G114				
G132	EIS	Table 20.1	Summary of Mitigation Strategies for greenhouse gas	<ul style="list-style-type: none"> <li>Minimise the use of fuel by selecting fuel efficient plant and equipment, operating vehicles and machinery in a fuel-efficient manner e.g. turning off idling equipment, and selecting construction techniques that utilise lower amounts of fuel;</li> <li>Implement a maintenance plan for all fuel and electrically powered equipment;</li> <li>Implement energy conservation practices by all staff (which can be enforced through appropriate training);</li> <li>Use solar panels.</li> </ul>	Record, observation	See Item G115				
G133	EIS	Table 20.1	Summary of Mitigation Strategies for noise and vibration	<ul style="list-style-type: none"> <li>Avoid the coincidence of noisy plant working simultaneously close together would result in reduced noise emissions;</li> <li>Equipment which is used intermittently is to be shut down when not in use;</li> <li>Where possible, equipment with directional noise emissions should be oriented away from sensitive receivers;</li> <li>Regular compliance checks on the noise emissions of all plant and machinery used for the proposal would indicate whether noise emissions from plant items were higher than predicted. This also identifies defective silencing equipment on the items of plant;</li> <li>Non-tonal reversing alarms should be used on all items of plants and heavy vehicles used for construction;</li> <li>Existing doors are closed during the waste processing whenever practicable (note this measure is not required to achieve the Project Noise Trigger Levels for the project and is at the discretion of the proponent).</li> </ul>	Record, observation	See Item G116				
G134	EIS	Table 20.1	Summary of Mitigation Strategies for biodiversity during operation	<ul style="list-style-type: none"> <li>Vehicles should not drive off the designated parking area into vegetation within the study area to reduce impact to resident fauna and flora within the study area during the operations phase;</li> <li>Any animals injured during operations should be taken immediately to the Motto Farm Veterinary Hospital for treatment. Any animals suspected to require rehabilitation would be delivered post-veterinary care to an appropriate animal rehabilitator associated with Wildlife in Need of Care Phone 1300 946 295);</li> <li>The following measures should be implemented to prevent exotic plant material from entering/exiting the study area: <ul style="list-style-type: none"> <li>No imported/exported material to be permitted unless it has been inspected and confirmed to be free of dirt and mud which may contain weed seeds and vegetative material such as bulbs, root fragment, tubers or rhizomes;</li> <li>Vehicles and machinery to be clean of soils, vegetation and seeds that have been brushed off or washed down prior to entering the study area;</li> <li>A clean down register to be maintained at the entry of the study area; and</li> <li>Trucks are not to drive off the designated parking area onto vegetation within the site;</li> </ul> </li> <li>As a part of maintenance within the study area any high threat weeds known to occur will be controlled in accordance with appropriate DPI guidelines. Guidelines for the treatment of high threat weeds can be sourced within the DPI website;</li> <li>Any artificial lighting used for security at night should be angled/directed downwards to avoid excessive light pollution affecting adjacent habitat.</li> </ul>	Record, observation	See Item G118				

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G135	EIS	Table 20.1	Summary of Mitigation Strategies for soil and water	<ul style="list-style-type: none"> <li>All waste handling and storage will be under cover and within bunded areas.</li> <li>Each of the main buildings (Buildings 1, 2 and 3) will have internal bunds to contain any leaks or spills within them. They will also contain any fire water, if necessary.</li> <li>A stormwater capture and treatment system will be installed to treat water from the truck parking depot. This will supplement the existing stormwater treatment system, which treats stormwater from the existing paved area. The following water quality treatment devices will be utilised: <ul style="list-style-type: none"> <li>OceanGuard Pit Filter Insert – Runoff captured by the hardstand will pass through a filter insert that will aid in the capture of gross pollutants, sediment, litter and oils. An oil absorbent pillow will also be installed as part of the filter insert, which will assist in the capture of small amounts of hydrocarbons or oils that would otherwise enter the stormwater system.</li> <li>Ocean Protect Psorb Filter Cartridges – Proprietary filter cartridges will filter stormwater runoff capturing and removing fine sediment, as well as nutrients including phosphorous and nitrogen.</li> </ul> </li> <li>An emergency shutoff valve will be installed for the new stormwater system that will contain any oil or diesel spills and prevent them from entering the stormwater infiltration system.</li> </ul>	Observation	<p>10/07/2023: - See Item G76</p> <p>Observation: - Each main building is self-bunded.</p> <p>Record sighted: - Northrop (27 August 2020) Soil and Water Management Plan for 21D &amp; 21F Schools Drive, Tomago. Sections 2.2.1 and 2.2.2 document the implementation of stormwater drains onsite.</p>				
G136	EIS	Table 20.1	Summary of Mitigation Strategies for heritage	<ul style="list-style-type: none"> <li>All on-site personnel are to be made aware of their obligations under the National Parks and Wildlife Act 1974, this includes protection of Aboriginal sites and the reporting of any new Aboriginal, or suspected Aboriginal, heritage sites. This may be done through an onsite induction or other suitable format;</li> <li>All on-site personnel are to be made aware of their obligations under the NSW Heritage Act 1977, including the reporting of any historic, or suspected historic material. This may be done through an onsite induction or other suitable format;</li> <li>In the unlikely event that Aboriginal or suspected Aboriginal archaeological material is uncovered during the development, then works in that area are to stop and the area cordoned off. The project manager is to contact the heritage consultant to make an assessment as to whether the material is classed as Aboriginal object/s under the National Parks and Wildlife Act and advise on the required management and mitigation measures. Works are not to re-commence in the cordoned off area until heritage clearance has been given and/or the required management and mitigation measures have been implemented;</li> </ul>	Record	See Item G119				
G137	EIS	Table 20.1	Summary of Mitigation Strategies for bushfire	<ul style="list-style-type: none"> <li>At the commencement of building works and in perpetuity, manage an inner protection area (IPA) for the entire property as outlined within Appendix 4 of Planning for Bush Fire Protection (2019) and the NSW Rural Fire Service's Standards for Asset Protection Zones;</li> <li>Undertake landscaping in accordance with Appendix 4 of Planning for Bush Fire Protection (2019) and manage and maintain in perpetuity;</li> <li>Property owner and occupants to familiarise themselves with the relevant bushfire preparation and survival information provided by the New South Wales Rural Fire Service;</li> <li>Implement emergency evacuation plans prepared for the workplace with specific consideration of bushfire evacuation and management planning;</li> </ul>	Record, observation	See Item G120				
G138	EIS	Table 20.1	Summary of Mitigation Strategies for contamination	<ul style="list-style-type: none"> <li>Implement remedial measures as detailed in the Remedial Action Plan,</li> <li>Prepare and implement a Long-Term Environmental Management Plan.</li> </ul>	Record, observation	See Item G121				
G139	EIS	Table 20.1	Summary of Mitigation Strategies for chemicals, fuels and pollution incidents	<ul style="list-style-type: none"> <li>All liquid wastes, chemicals and fuels to be handled and stored under cover in bunded areas;</li> <li>All staff working in areas with liquid wastes to be properly trained and wear PPE at all times;</li> <li>MSDS sheets, where available, to be readily accessible for all chemicals on site;</li> <li>Chemical spill kits and "absorbent sausages" to be kept on site and readily accessible near liquid waste and chemical storage;</li> <li>Firefighting equipment to be accessible and regularly inspected.</li> </ul>	Record, observation	See Item G122				
G140	EIS	Table 20.2	Summary of Mitigation Strategies for fire safety	<p>Recommended mitigation measures:</p> <ul style="list-style-type: none"> <li>Building 1 will be fitted with ridgeline exhaust fans capable of extracting smoke at the rate of 18m<sup>3</sup>/s within 10 minutes of the fire reaching steady heat release;</li> <li>Building 1 will have a minimum 10mm high perimeter bund around the inside of the building;</li> <li>Building 2 will be fitted with ridgeline exhaust fans capable of extracting smoke at the rate of 17m<sup>3</sup>/s within 6 minutes of the fire reaching steady heat release;</li> <li>Building 2 will have a minimum 16mm high perimeter concrete bund around the inside of the building;</li> <li>Building 3 will be fitted with ridgeline exhaust fans capable of extracting smoke at the rate of 26m<sup>3</sup>/s that are interlocked with the fire alarm;</li> <li>Building 3 will have a minimum 5mm high perimeter concrete bund around the inside of the building;</li> <li>Internal stockpiles will be arranged to allow for six (6) metres unobstructed access around internal stockpiles; and o Internal stockpiles will have a maximum volume of 1000m<sup>3</sup>.</li> <li>Provide an emergency tipping area, such as the undeveloped areas on Site 21F, at least 10 metres from parked vehicles and within a 70 metre radius of hydrant FH5;</li> <li>Use portable infrared detectors to check for thermal hotspots;</li> <li>Install fixed infrared cameras with audible alarm at five (5) identified high fire load locations;</li> <li>Install automatic sprinkler system in Building 2;</li> <li>Building 2 will require the installation of 4 x 36m (DN19) fire hose reels adjacent personal access doors to ensure coverage of the building internal floor area;</li> <li>2A 60B(E) 9 kg powder fire extinguishers will be installed on all the vehicles working in the vicinity of the fire compartments;</li> <li>5 x 2A 60B(E) 9 kg powder fire extinguishers to be inside the recycling plant; o Lithium batteries must be stored in accordance with the Dangerous Goods Code and AS/NZS 4681:2000 The storage and handling of Class 9 (miscellaneous) dangerous goods and articles; and</li> <li>Plastics will be removed on a regular basis to ensure that individual storage areas, no greater than 20m<sup>2</sup> and 2 metres high, are separated from adjoining storages by no less than 2.4 metres.</li> </ul>	Record, observation	See Item G123				
G141	EIS	Table 20.2	Summary of Mitigation Strategies for visual impact	<ul style="list-style-type: none"> <li>Preferably plant native trees and large shrubs along the boundary to help screen the proposed development from future development of adjacent Lots;</li> <li>Ensure the proposed development is offset from the boundary to allow screen planting;</li> <li>Plant native trees along the road verge of 21D to reduce views to the proposed development from future development.</li> </ul>	Observation	See Item G124				

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<b>Environmental Protection License (EPL)</b>																																					
G142	EPL21636	A1.1	What the licence authorises and regulates	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Resource recovery</td> <td>Recovery of general waste</td> <td>Any general waste recovered</td> </tr> <tr> <td>Resource recovery</td> <td>Recovery of hazardous and other waste</td> <td>Any hazardous and other waste recovered</td> </tr> <tr> <td>Waste storage</td> <td>Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste</td> <td>Any listed waste type stored</td> </tr> <tr> <td>Waste storage</td> <td>Waste storage - other types of waste</td> <td>Any other types of waste stored</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Resource recovery	Recovery of general waste	Any general waste recovered	Resource recovery	Recovery of hazardous and other waste	Any hazardous and other waste recovered	Waste storage	Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	Any listed waste type stored	Waste storage	Waste storage - other types of waste	Any other types of waste stored	Record	10/07/2023: Interview: Remondis (RM) confirmed that the activities conducted onsite as per this consent only.																
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G143	EPL21636	A2.1	Premises or plant to which this licence applies	<p>The licence applies to the following premises:</p> <table border="1"> <thead> <tr> <th>Premises Details</th> </tr> </thead> <tbody> <tr> <td>TOMAGO RESOURCE RECOVERY FACILITY AND DEPOT</td> </tr> <tr> <td>21D AND 21F SCHOOL DRIVE</td> </tr> <tr> <td>TOMAGO</td> </tr> <tr> <td>NSW 2322</td> </tr> <tr> <td>LOT 8 DP 279328, LOT 11 DP 279328, LOT 2 DP 1278541</td> </tr> </tbody> </table>	Premises Details	TOMAGO RESOURCE RECOVERY FACILITY AND DEPOT	21D AND 21F SCHOOL DRIVE	TOMAGO	NSW 2322	LOT 8 DP 279328, LOT 11 DP 279328, LOT 2 DP 1278541		Noted																									
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G144	EPL21636	A3.1	Information supplied to the EPA	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence</p>	Record	10/07/2023: Interview: Remondis (RM) confirmed that the activities conducted onsite as per this consent only.																															
G145	EPL21636	A3.2	Information supplied to the EPA	<p>Works and activities must be carried out in accordance with the proposal contained in:</p> <p>a) the conditions of consent for SSD-10447 approved by the Director, Industry Assessment for Department of Planning, Industry and Environment on 12 October 2021;</p> <p>b) all additional information supplied to the EPA in relation to the development</p>	Record	10/07/2023: Record sighted: - EPL Variation Application Summary sighted (21636) 15 July 2022.																															
G146	EPL21636	P1.1	Location of monitoring/dischARGE points and areas	<p>The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.</p> <table border="1"> <thead> <tr> <th colspan="4">Water and land</th> </tr> <tr> <th>EPA Identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Groundwater quality monitoring</td> <td></td> <td>Groundwater bore at co-ordinates XY (Zone 56, 381033, 6367134) shown as MW4 in Figure 9.</td> </tr> <tr> <td>2</td> <td>Groundwater quality monitoring</td> <td></td> <td>Groundwater bore at co-ordinates XY (Zone 56, 380931, 6367399) shown as MW6 in Figure 9.</td> </tr> <tr> <td>3</td> <td>Groundwater quality monitoring</td> <td></td> <td>Groundwater bore at co-ordinates XY (Zone 56, 381085, 6367166) shown as MW7 in Figure 9.</td> </tr> <tr> <td>4</td> <td>Groundwater monitoring quality</td> <td></td> <td>Groundwater bore at co-ordinates XY (Zone 56, 381108, 6367235) shown as MW8 in Figure 9.</td> </tr> <tr> <td>5</td> <td>Groundwater quality monitoring</td> <td></td> <td>Groundwater bore at co-ordinates XY (Zone 56, 381110, 6367283) shown as MW9 in Figure 9.</td> </tr> </tbody> </table>	Water and land				EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Groundwater quality monitoring		Groundwater bore at co-ordinates XY (Zone 56, 381033, 6367134) shown as MW4 in Figure 9.	2	Groundwater quality monitoring		Groundwater bore at co-ordinates XY (Zone 56, 380931, 6367399) shown as MW6 in Figure 9.	3	Groundwater quality monitoring		Groundwater bore at co-ordinates XY (Zone 56, 381085, 6367166) shown as MW7 in Figure 9.	4	Groundwater monitoring quality		Groundwater bore at co-ordinates XY (Zone 56, 381108, 6367235) shown as MW8 in Figure 9.	5	Groundwater quality monitoring		Groundwater bore at co-ordinates XY (Zone 56, 381110, 6367283) shown as MW9 in Figure 9.	Observation	10/07/2023: Record sighted: - JME (5 March 2023) Groundwater Monitoring Report.			
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G147	EPL21636	P1.2	Location of monitoring/dischARGE points and areas	<p>For the purposes of condition P1.1, Figure 9 refers to the figure titled "Groundwater monitoring well locations (Google Earth 2022)" within the document titled "Tomago Resource Recovery Facility and Truck Parking Depot Water Management Plan, 022-ENV-Mp-002 Rev 3" (DOC22/724698-2).</p>	Observation	10/07/2023: Record sighted: - JME (5 March 2023) Groundwater Monitoring Report.																															
G148	EPL21636	L1.1	Pollution of waters	<p>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.</p>	Record	10/07/2023: Interview: Remondis (RM) confirmed that no pollution of waters has occurred.																															

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G149 See also G7	EPL21636	L2.1	Waste	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p> <table border="1"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> <th>Other Limits</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td>Dry commercial and industrial waste which includes glass, plastic, rubber, ceramics, bricks, concrete, plasterboard and textiles and/or any mixture of the wastes referred to above.</td> <td>Resource recovery Waste storage</td> <td></td> </tr> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td>Includes only metal waste</td> <td>Resource recovery Waste storage</td> <td></td> </tr> <tr> <td>NA</td> <td>Hazardous Wastes</td> <td>Includes only used fire extinguishers and pressure vessels</td> <td>Waste storage</td> <td>The total amount of used fire extinguishers and pressure vessels received at the premises in any 12 month period must not exceed 50 tonnes.</td> </tr> <tr> <td>G110</td> <td>Organic solvent excluding halogenated solvents</td> <td>Includes only residual solvents, thinners and paints</td> <td>Waste storage</td> <td>The total amount of organic solvents waste received at the premises in any 12 month period must not exceed 50 tonnes.</td> </tr> <tr> <td>NA</td> <td>Electronic waste</td> <td></td> <td>Waste storage</td> <td>The total amount of electronic waste received at the premises in any 12 month period must not exceed 50 tonnes.</td> </tr> <tr> <td>D120</td> <td>mercury, excluding mercury compounds</td> <td>Includes only fluorescent lighting tubes</td> <td>Waste storage</td> <td>The total amount of fluorescent lighting tubes at the premises in any 12 month period must not exceed 50</td> </tr> <tr> <td>NA</td> <td>Batteries</td> <td>Includes only lithium ion and nickle-cadmium batteries</td> <td>Waste storage</td> <td>The total amount of lithium ion and nickle-cadmium batteries received at the premises in any 12 month period must not exceed 1 tonne.</td> </tr> <tr> <td>J120</td> <td>Waste oil/hydrocarbons mixtures/emulsions in water</td> <td></td> <td>Waste storage</td> <td>The total amount of waste oil/hydrocarbons mixtures/emulsions received at the premises in any 12 month period must not exceed 300 tonnes.</td> </tr> <tr> <td>J100</td> <td>Waste mineral oils unfit for their original intended use</td> <td></td> <td>Waste storage</td> <td>The total amount of waste mineral oil to be received at the premises in any 12 month period must not exceed 6,000 tonnes.</td> </tr> <tr> <td>D220</td> <td>Lead acid batteries</td> <td></td> <td>Waste storage</td> <td>The total amount of lead acid battery waste received at the premises in any 12 month period must not exceed 500 tonnes.</td> </tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	NA	General solid waste (non-putrescible)	Dry commercial and industrial waste which includes glass, plastic, rubber, ceramics, bricks, concrete, plasterboard and textiles and/or any mixture of the wastes referred to above.	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D120	mercury, excluding mercury compounds	Includes only fluorescent lighting tubes	Waste storage	The total amount of fluorescent lighting tubes at the premises in any 12 month period must not exceed 50																																																													
NA	Batteries	Includes only lithium ion and nickle-cadmium batteries	Waste storage	The total amount of lithium ion and nickle-cadmium batteries received at the premises in any 12 month period must not exceed 1 tonne.																																																													
J120	Waste oil/hydrocarbons mixtures/emulsions in water		Waste storage	The total amount of waste oil/hydrocarbons mixtures/emulsions received at the premises in any 12 month period must not exceed 300 tonnes.																																																													
J100	Waste mineral oils unfit for their original intended use		Waste storage	The total amount of waste mineral oil to be received at the premises in any 12 month period must not exceed 6,000 tonnes.																																																													
D220	Lead acid batteries		Waste storage	The total amount of lead acid battery waste received at the premises in any 12 month period must not exceed 500 tonnes.																																																													

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G149 cont. See also G7				<table border="1"> <tr> <td>N120</td> <td>Soils contaminated with a substance or waste referred to in Parts 1 or 2 of Schedule 1 of the Protection of the Environment Operations (Waste) Regulation 2014</td> <td></td> <td>Waste storage</td> <td>The total amount of contaminated soil waste received at the premises in any 12 month period must not exceed 12,000 tonnes. The contaminated soil must only be stored within an intermediate bulk container and/or drums.</td> </tr> <tr> <td>N100</td> <td>Containers &amp; drums containing controlled waste residues</td> <td></td> <td>Waste storage</td> <td>The total amount of containers &amp; drums containing controlled waste at the premises in any 12 month period must not exceed 500 tonnes.</td> </tr> <tr> <td>NA</td> <td>General solid waste (putrescible)</td> <td>Includes only food waste as defined in Schedule 1 of the Protection of the Environment Operations Act 1997, in force from time to time</td> <td>Resource recovery Waste storage</td> <td>Must only be processed in the Packaged Food Recycling Plant. The total amount of food waste received at the premises in any 12 month period must not exceed 2,000 tonnes.</td> </tr> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td>Includes only drained oil filters (mechanically crushed), rags and oil absorbent materials that only contain non-volatile petroleum hydrocarbons and do not contain free liquids</td> <td>Waste storage</td> <td>The total amount of drained oil filters, rags and oil absorbent waste materials received at the premises in any 12 month period must not exceed 500 tonnes.</td> </tr> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td>Includes only copper wire</td> <td>Resource recovery Waste storage</td> <td></td> </tr> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td>Includes only paper and cardboard</td> <td>Resource recovery Waste storage</td> <td></td> </tr> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td>Includes only building and demolition waste as defined in Schedule 1 of the Protection of the Environment Operations Act 1997, in force from time to time</td> <td>Resource recovery Waste storage</td> <td></td> </tr> </table>	N120	Soils contaminated with a substance or waste referred to in Parts 1 or 2 of Schedule 1 of the Protection of the Environment Operations (Waste) Regulation 2014		Waste storage	The total amount of contaminated soil waste received at the premises in any 12 month period must not exceed 12,000 tonnes. The contaminated soil must only be stored within an intermediate bulk container and/or drums.	N100	Containers & drums containing controlled waste residues		Waste storage	The total amount of containers & drums containing controlled waste at the premises in any 12 month period must not exceed 500 tonnes.	NA	General solid waste (putrescible)	Includes only food waste as defined in Schedule 1 of the Protection of the Environment Operations Act 1997, in force from time to time	Resource recovery Waste storage	Must only be processed in the Packaged Food Recycling Plant. The total amount of food waste received at the premises in any 12 month period must not exceed 2,000 tonnes.	NA	General solid waste (non-putrescible)	Includes only drained oil filters (mechanically crushed), rags and oil absorbent materials that only contain non-volatile petroleum hydrocarbons and do not contain free liquids	Waste storage	The total amount of drained oil filters, rags and oil absorbent waste materials received at the premises in any 12 month period must not exceed 500 tonnes.	NA	General solid waste (non-putrescible)	Includes only copper wire	Resource recovery Waste storage		NA	General solid waste (non-putrescible)	Includes only paper and cardboard	Resource recovery Waste storage		NA	General solid waste (non-putrescible)	Includes only building and demolition waste as defined in Schedule 1 of the Protection of the Environment Operations Act 1997, in force from time to time	Resource recovery Waste storage		Record						
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G150	EPL21636	L2.2	Waste	The authorised amount of waste permitted on the premises cannot exceed 3,500 tonnes at any one time.	Record	10/07/2023: Record sighted - March 2023 663 tonnes onsite (WCMR: Tomago Resource Recovery Facility and Depot.) Interview: - Remondis (RM) confirmed that the site has not received over 3500 tonnes since the start of the operation.																																								
G151 (see also G215 and G34)	EPL21636	L2.3	Waste	Incoming waste used to generate material for energy recovery must comply with the resource recovery criteria for energy recovery facilities - mixed waste streams as specified in Table 4 of the EPA 2021, NSW Energy from Waste Policy Statement, Parramatta, in force from time to time.	Record	10/07/2023: Interview: Remondis (PW) stated that Energy from Waste operation has not commenced.																																								
G152	EPL21636	L2.4	Waste	Incoming waste used to generate material for energy recovery to which the 'no limit' category as specified in Table 4 of the EPA 2021, NSW Energy from Waste Policy Statement, Parramatta, in force from time to time, only applies to entities listed in Appendix A of Remondis Australia Pty Ltd 2022, Tomago Resource Recovery Facility: Energy from Waste Management Plan - Eligible Fuels, Mascot dated 27/06/2022 (DOC22/570579). To add new entities to Attachment A, the licensee must receive written approval from the EPA.	Record	10/07/2023: Interview: Remondis (PW) stated that Energy from Waste operation has not commenced.																																								
G153	EPL21636	L3.1	Hours of operation	Construction works at the premises must:	Record	10/07/2023: Interview: Remondis (RM) confirmed that no construction works have occurred at the site. This condition will be triggered when additional works at Buildings 1 and 2 commence.																																								
				a) only be undertaken between the hours of 7:00 am and 6:00 pm Monday to Friday;	Record																																									
				b) only be undertaken between the hours of 8:00 am and 1:00 pm Saturday; and	Record																																									
				c) not be undertaken on Sundays or Public Holidays	Record																																									

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G154	EPL21636	L3.2	Hours of operation	Construction works outside of the hours identified in condition L3.1 may be undertaken in the following circumstances: a) no more than 5dB above Rating Background Level at any residence in accordance with the Interim Construction Noise Guideline (DECC, 2009); or b) no more than the Noise Management Levels specified in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) at other sensitive land uses; or c) the delivery of materials requested by police or other authorised authorities for safety reasons; or d) emergency work to avoid the loss of lives, property, and/or to prevent environmental harm; or e) other activities as agreed in writing by the Planning Secretary.	Record Record Record Record Record	10/07/2023: Interview: Remondis (RM) confirmed that no construction works have occurred at the site. This condition will be triggered when additional works at Buildings 1 and 2 commence.				
G155	EPL21636	L4.1	Potentially offensive odour	No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997. <i>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</i>		Noted				
G156	EPL21636	O1.1	Activities must be carried out in a competent manner	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Observation Observation	10/07/2023: Observation: - Processing, handling, movement and storage of materials and substances were considered to be conducted in competent manner. - See Item G76 on storage of chemicals. 10/07/2023: Observation: - Treatment, storage, processing, reprocessing, transport and disposal of waste were considered to be conducted in competent manner. - Please see Item G34 for waste disposal.				
G157	EPL21636	O1.2	Maintenance of plant and equipment	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Record Observation	10/07/2023: Record sighted: Asset register record for weekly Australian Bale Press 10/07/2023: Observation: - No efficiency was observed at the time of audit.				
G158	EPL21636	O3.1	Dust	All areas must be maintained, at all times, in a condition that effectively minimises the generation and emission of dust from the premises.	Observation	10/07/2023: Observation: - All areas were observed to be adequately maintained with no unacceptable dust observed.				
G159	EPL21636	O3.2	Dust	Activities occurring at the premises must be carried out in a manner that will minimise the generation of dust from the premises.	Observation	10/07/2023: Observation: - All areas were observed to be adequately maintained with no unacceptable dust observed.				
G160	EPL21636	O3.3	Dust	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during material inspection, unloading and loading.	Observation	10/07/2023: Observation: - No trucks were observed to enter and leave the site at the time of Audit. Trucks parked near the entrance had their loads covered.				
G161	EPL21636	O4	Emergency response	Note: The licensee must prepare, maintain and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. The licensee must develop their PIRMP in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations Act 1997 (the POEO Act) and the POEO Regulations	Record	10/07/2023: Record sighted: - Remondis (28 March 2023) Pollution Incident Response Management Plan.				
G162	EPL21636	O5.1	Processes and management	The licensee must comply with the requirements set out in the EPA Standards for managing construction waste in NSW as in force from time to time.	Record, observation	No construction has occurred onsite.				
G163	EPL21636	O5.2	Processes and management	All liquid waste, chemicals and fuels loading, unloading, storage recovery and general handling must occur undercover within bunded areas	Observation	10/07/2023: Observation: - Liquid waste, chemicals and fuels were stored within bunded areas and have cover. - See Item G76				
G164	EPL21636	O5.3	Processes and management	All above ground tanks containing material that is likely to cause environmental harm must be bunded or have an alternative spill containment system in place.	Observation	10/07/2023: Observation: - The above ground tanks were self bunded.				

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G165	EPL21636	O5.4	Processes and management	Bunds must: a) have walls and floors constructed of impervious materials;  b) be of sufficient capacity to contain 110% of the volume of the tank (or 110% volume of the largest tank where a group of tanks are installed);  c) have floors graded to a collection sump; and  d) not have a drain valve incorporated in the bund structure, or be constructed and operated in a manner that achieves the same environmental outcome	Observation  Record  Observation  Observation	10/07/2023: Observation: The bunds and floors were made of metal.  10/07/2023: Observation: - The diesel tank has a plate stating compliance to AS 1692-2006 and AS1657-1992 and AS1940-2017 UL 142 & ULC-S601.  10/07/2023: Record sighted: - Remondis (RM) showed a photograph of the sump with an item that appeared to be a pump to empty the sump when required.  10/07/2023: Observation: Drain valve was not observed in the bund structures.				
G166	EPL21636	O5.5	Processes and management	The licensee must ensure all vehicles, motorised plant and equipment leaving the premises do not deposit mud, soil, sand, gravel and any other materials onto public roads	Observation	10/07/2023: Observation: The roads were observed to be clear of mud, soil, etc. associated from the site.				
G167	EPL21636	O6.1	Waste management	Any waste for processing, storage or resource recovery at the premises must be assessed and classified in accordance with the EPA Waste Classification Guidelines as in force from time to time.	Record	10/07/2023: Record sighted: - JME (6 July 2023) Waste classification for North Lambton Edgeworth and Dora Creek Depot Test Order Request (23-041, 043, 045 and 046).				
G168	EPL21636	O6.2	Waste management	All waste receipt, storage, handling and processing must be undertaken inside buildings at the premises.	Observation	10/07/2023: Observation: - All waste receipt, storage, handling and processing were observed to be inside buildings.				
G169	EPL21636	O6.3	Waste management	Stockpiles of unsorted, sorted and processed waste must only be stored within clearly marked and signposted designated areas at the premises.	Observation	10/07/2023: Observation: - Stockpiles of cardboard, plastic, timber, glass were observed to be segregated in separate areas.				
G170	EPL21636	O6.4	Waste management	Each type of waste stored at the premises for recovery/recycling must be stockpiled separately.	Observation	10/07/2023: Observation: - Different waste streams were observed to be segregated in separate areas.				
G171	EPL21636	M1.1	Monitoring record	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Record	10/07/2023: Record sighted: - Remondis (2022-2023) Groundwater Monitoring Data				
G172	EPL21636	M1.2	Monitoring record	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form;  b) kept for at least 4 years after the monitoring or event to which they relate took place; and  c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Record  Record  Record	10/07/2023: Record sighted: - Remondis (2022-2023) Groundwater Monitoring Data  This is the first Annual Return  10/07/2023: Record sighted: - Remondis (2022-2023) Groundwater Monitoring Data				
G173	EPL21636	M1.3	Monitoring record	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken;  b) the time(s) at which the sample was collected;  c) the point at which the sample was taken; and  d) the name of the person who collected the sample.	Record  Record  Record  Record	10/07/2023: Record sighted: - Remondis (2022-2023) Groundwater Monitoring Data  No time of sampling was provided  10/07/2023: Record sighted - JME (5 March 2023) Groundwater Monitoring Report.  10/07/2023: Record sighted - JME (5 March 2023) Groundwater Monitoring Report.				
G174	EPL21636	M2.1	Requirement to monitor concentration of pollutants discharged	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Record	10/07/2023: Record sighted - JME (5 March 2023) Groundwater Monitoring Report.				

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G175	EPL21636	M2.2	Requirement to monitor concentration of pollutants discharged	Water and/ or Land Monitoring Requirements <b>POINT 1,2,3,4,5</b> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Arsenic</td> <td>milligrams per litre</td> <td>Special Frequency 1</td> <td>Representative sample</td> </tr> <tr> <td>Cadmium</td> <td>milligrams per litre</td> <td>Special Frequency 1</td> <td>Representative sample</td> </tr> <tr> <td>Chromium</td> <td>milligrams per litre</td> <td>Special Frequency 1</td> <td>Representative sample</td> </tr> <tr> <td>Copper</td> <td>milligrams per litre</td> <td>Special Frequency 1</td> <td>Representative sample</td> </tr> <tr> <td>Dissolved Oxygen</td> <td>milligrams per litre</td> <td>Special Frequency 1</td> <td>Representative sample</td> </tr> <tr> <td>Electrical conductivity</td> <td>microsiemens per centimetre</td> <td>Special Frequency 1</td> <td>Representative sample</td> </tr> <tr> <td>Lead</td> <td>milligrams per litre</td> <td>Special Frequency 1</td> <td>Representative sample</td> </tr> <tr> <td>Perfluorooctane acid (PFOA)</td> <td>milligrams per litre</td> <td>Special Frequency 1</td> <td>Representative sample</td> </tr> <tr> <td>pH</td> <td>pH</td> <td>Special Frequency 1</td> <td>Representative sample</td> </tr> <tr> <td>Redox potential</td> <td>millivolts</td> <td>Special Frequency 1</td> <td>Representative sample</td> </tr> <tr> <td>Standing Water Level</td> <td>metres (Australian Height Datum)</td> <td>Special Frequency 1</td> <td>In situ</td> </tr> <tr> <td>Zinc</td> <td>milligrams per litre</td> <td>Special Frequency 1</td> <td>Representative sample</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	Arsenic	milligrams per litre	Special Frequency 1	Representative sample	Cadmium	milligrams per litre	Special Frequency 1	Representative sample	Chromium	milligrams per litre	Special Frequency 1	Representative sample	Copper	milligrams per litre	Special Frequency 1	Representative sample	Dissolved Oxygen	milligrams per litre	Special Frequency 1	Representative sample	Electrical conductivity	microsiemens per centimetre	Special Frequency 1	Representative sample	Lead	milligrams per litre	Special Frequency 1	Representative sample	Perfluorooctane acid (PFOA)	milligrams per litre	Special Frequency 1	Representative sample	pH	pH	Special Frequency 1	Representative sample	Redox potential	millivolts	Special Frequency 1	Representative sample	Standing Water Level	metres (Australian Height Datum)	Special Frequency 1	In situ	Zinc	milligrams per litre	Special Frequency 1	Representative sample	record	10/07/2023: Record sighted - JME (5 March 2023) Groundwater Monitoring Report.			
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G176	EPL21636	M2.3	Requirement to monitor concentration of pollutants discharged	For the purposes of the table above: (a) Special Frequency 1 means the collection of samples monthly during remediation and post remediation work. Remediation work is defined in condition E3.1 of the licence.		Noted																																																							
G177	EPL21636	M3.1	Testing methods concentration limits	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	Record	10/07/2023: Record sighted - JME (5 March 2023) Groundwater Monitoring Report.																																																							
G178	EPL21636	M4.1	Weather monitoring	For the purpose of complying with condition R4.1 and other conditions of this Licence, rainfall data must be obtained from the Australian Bureau of Meteorology Williamstown RAAF weather station.	Record	10/07/2023: Record sighted - JME (5 March 2023) Groundwater Monitoring Report. - Email from JME (20 September 2023) to Remondis confirming that the 'source the rainfall data from Williamstown RAAF weather station'.																																																							
G179	EPL21636	M5.1	Recording of pollution complaints	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Record	10/07/2023: Interview: Remondis (RM) confirmed that no complaints have been received since the commencement of operation.																																																							
G180	EPL21636	M5.2	Recording of pollution complaints	The record must include details of the following:	Record	10/07/2023: Interview: Remondis (RM) confirmed that no complaints have been received since the commencement of operation.																																																							
				a) the date and time of the complaint;																																																									
				b) the method by which the complaint was made;	Record																																																								
				c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;	Record																																																								
				d) the nature of the complaint;	Record																																																								
				e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and	Record																																																								
f) if no action was taken by the licensee, the reasons why no action was taken.	Record																																																												
G181	EPL21636	M5.3	Recording of pollution complaints	The record of a complaint must be kept for at least 4 years after the complaint was made.	Record	10/07/2023: Interview: Remondis (RM) confirmed that no complaints have been received since the commencement of operation.																																																							
G182	EPL21636	M5.4	Recording of pollution complaints	The record must be produced to any authorised officer of the EPA who asks to see them.	Record	10/07/2023: Interview: Remondis (RM) confirmed that no complaints have been received since the commencement of operation.																																																							
G183	EPL21636	M6.1	Telephone complaints line	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Observation	10/07/2023: Record sighted - Remondis complaint telephone line on Remondis website (1300 110 638). The Auditor rang the complaints line on 12/9/2023 and found this was answered, however noting that the phone menu only included sales menu but the person answering menu 1 (existing customer) also stated that they accept complaints.	<b>Recommendation:</b> It would be prudent to update the phone menu in the Complaints Line to include complaints, in addition to sales menu.																																																						
G184	EPL21636	M6.2	Telephone complaints line	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Record	10/07/2023: Record sighted - Remondis complaint telephone line on Remondis website																																																							
G185	EPL21636	M6.3	Telephone complaints line	The preceding two conditions do not apply until 3 months after the date of the issue of this licence.		Noted, noting that at the time of the audit this condition no longer applies.																																																							

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G186	EPL21636	R1.1	Annual return documents	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:	Record	10/07/2023: Record sighted: - Tomago Annual Return for 2022/23				
				1. a Statement of Compliance,	Record					
				2. a Monitoring and Complaints Summary,	Record					
				3. a Statement of Compliance - Licence Conditions,	Record					
				4. a Statement of Compliance - Load based Fee,	Record					
				5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,	Record					
				6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and	Record					
7. a Statement of Compliance - Environmental Management Systems and Practices.	Record									
				At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due. An Annual Return must be prepared in respect of each reporting period, except as provided below. <i>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</i>	Record	10/07/2023: Record sighted: - Tomago Annual Return for 2022/23. This is the first annual return				
G188	EPL21636	R1.3	Annual return documents	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and	Record	The licence has not been transferred to a new licensee during the Audit period.				
				b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. <i>Note: An application to transfer a licence must be made in the approved form for this purpose.</i>	Record	The licence has not been transferred to a new licensee during the Audit period.				
G189	EPL21636	R1.4	Annual return documents	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Record	This licence has not been revoked.				
					Record	This licence has not been revoked.				
G190	EPL21636	R1.5	Annual return documents	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date')	Record	10/07/2023: Record sighted: Email from EPA dated 20 May 2023 stating EPA has received the Annual Return				
G191	EPL21636	R1.6	Annual return documents	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Record	This is the first Annual Return				
G192	EPL21636	R1.7	Annual return documents	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or	Record	10/07/2023: Record sighted: - Tomago Annual Return for 2022/23. This was signed by two directors.				
				b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Record	10/07/2023: Record sighted: - Tomago Annual Return for 2022/23. This was signed by two directors.				

Geosyntec ID	Document	SSD Condition / EPL or Management Plan	Item	Condition	Record / Observation	Evidence Collected / Observations	Independent Audit Findings and Recommendations	Compliance Status		
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G193	EPL21636	R2.1	Notification of environmental harm	Notifications must be made by telephoning the Environment Line service on 131 555. <i>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</i>	Record	10/07/2023: Record sighted: Fire incident occurred on 16 Feb 2023 was reported to EPA via Environment Line (EPA confirmation email dated 16 Feb 2023).				
G194	EPL21636	R2.2	Notification of environmental harm	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.	Record	10/07/2023: Record sighted: Fire incident occurred on 16 Feb 2023 was reported to EPA via Environment Line (EPA confirmation email dated 16 Feb 2023).				
G195	EPL21636	R3.1	Written report	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or	Record	10/07/2023: Record sighted: Remondis (RM) sent a written incident report to EPA on 23 February, 7 days after the incident.				
				b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event	Record	10/07/2023: Record sighted: Remondis (RM) sent a written incident report to EPA on 23 February, 7 days after the incident.				
G196	EPL21636	R3.2	Written report	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Record	10/07/2023: Interview: Remondis (RM) confirmed that the incident is not reportable.				
G197	EPL21636	R3.3	Written report	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event;	Record	10/07/2023: Interview: Remondis (RM) confirmed that the incident is not reportable.				
				b) the type, volume and concentration of every pollutant discharged as a result of the event;	Record	10/07/2023: Interview: Remondis (RM) confirmed that the incident is not reportable.				
				c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;	Record	10/07/2023: Interview: Remondis (RM) confirmed that the incident is not reportable.				
				d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;	Record	10/07/2023: Interview: Remondis (RM) confirmed that the incident is not reportable.				
				e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;	Record	10/07/2023: Interview: Remondis (RM) confirmed that the incident is not reportable.				
				f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and	Record	10/07/2023: Interview: Remondis (RM) confirmed that the incident is not reportable.				
				g) any other relevant matters.	Record	10/07/2023: Interview: Remondis (RM) confirmed that the incident is not reportable.				
G198	EPL21636	R3.4	Written report	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Record	10/07/2023: Interview: Remondis (RM) confirmed that the incident is not reportable.				
G199	EPL21636	R4.1	Other reporting conditions	The licensee must provide with its Annual Return to the EPA, a groundwater monitoring report. The report must be prepared by an appropriately qualified and experienced person and include: a) A graphical representation of the monitoring results required by condition M2.1 for the annual return period;	Record	10/07/2023: Record sighted: - JME (5 March 2023) Groundwater Monitoring Report.				
				b) For each parameter required to be monitored by condition M2.1, provide a graph that compares the ANZECC Guideline trigger value with the monitoring results since monitoring began.	Record	10/07/2023: Record sighted: - JME (5 March 2023) Groundwater Monitoring Report.				
				c) include daily rainfall data in graphical form.	Record	10/07/2023: Record sighted: - JME (5 March 2023) Groundwater Monitoring Report.				
G200	EPL21636	R4.2	Other reporting conditions	The licensee must engage a suitably qualified and experience person to complete a yearly review of the entities that the mixed commercial and industrial (C&I) 'no limit' category applies to. The 'no limit' category is defined in Table 4 of the EPA 2021, NSW Energy from Waste Policy Statement, Parramatta, in force from time to time. The review must be provided to the EPA with the Annual Return and include at a minimum the following: a) written evidence that all entities listed in Attachment A of the Remondis Australia Pty Ltd 2022, Tomago Resource Recovery Facility: Energy from Waste Management Plan - Eligible Fuels, Mascot dated 27/06/2022 (DOC22/570579) have a separate and effective collecting system for all reusable and recyclable waste streams such as paper/cardboard; organic collection; and residual waste collection.	Record	10/07/2023: Interview: Remondis (PW) stated that Energy from Waste operation has not commenced.				
G201	EPL21636	G1.1	Copy of licence kept at the premises or plant	A copy of this licence must be kept at the premises to which the licence applies.	Observation	10/07/2023: Observation: A copy of the licence is kept at the reception as well as the HSEQ noticeboard.				
G202	EPL21636	G1.2	Copy of licence kept at the premises or plant	The licence must be produced to any authorised officer of the EPA who asks to see it.		Noted				
G203	EPL21636	G1.3	Copy of licence kept at the premises or plant	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Observation	10/07/2023: Observation: A copy of the licence is kept at the reception as well as the HSEQ noticeboard.				
G204	EPL21636	E1.1	Financial Assurance	A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA.	Record	10/07/2023: Interview: Remondis (EL) confirmed that the cheque was delivered to EPA by the due date. - Email from Remondis to EPA (31 August 2023) and EPA email response (21 August 2023) states that EPA confirmed that the financial assurance was received by EPA on 26 September 2022.				
G205	EPL21636	E1.2	Financial Assurance	The financial assurance must be in favour of the EPA in the amount of eight hundred thousand dollars (\$800,000.00). The financial assurance is required to secure or guarantee funding for works or programmes required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or at the written direction of the EPA, to any other person. The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by APR	Record	10/07/2023: Record sighted: Email from Remondis (Helen McCarthy) to EPA on the methodology used to calculated the finance assurance amount of \$800,000.				
G206	EPL21636	E1.3	Financial Assurance	The financial assurance must be provided to the EPA by 5:00pm Monday 3 October 2022.	Record	10/07/2023: Interview: Remondis (EL) confirmed that the cheque was delivered to EPA by the due date. - Email from Remondis to EPA (31 August 2023) and EPA email response (21 August 2023) states that EPA confirmed that the financial assurance was received by EPA on 26 September 2022.				

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G207	EPL21636	E1.4	Financial Assurance	The financial assurance must be maintained during the operation of the facility and thereafter until such time as the EPA is satisfied the premises is environmentally secure.	Record	10/07/2023: Interview: Remondis (EL) confirmed that the amount will be maintained.				
G208	EPL21636	E1.5	Financial Assurance	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.		Noted				
G209	EPL21636	E1.6	Financial Assurance	The EPA may claim on a financial assurance under s303 of the Protection of the Environment Operations Act 1997 if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	Record	10/07/2023: Remondis (RM) confirmed the site has complied with the conditions of this license.				
G210	EPL21636	E1.7	Financial Assurance	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder.	Record	10/07/2023: Remondis (RM) confirmed no claim has been made by EPA.				
G211	EPL21636	E2.1	Environmental obligations of licensee	While the licensee's premises are being used for the purpose to which the licence relates, the licensee must:	Observation	10/07/2023: Interview: Remondis (PW) stated that no spills has occurred onsite.				
				a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents.	Record	10/07/2023: Interview: Remondis (RM) confirmed that the site has not received waste unlawfully deposited onsite.				
				b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA	Record	10/07/2023: Record sighted: Email from EPA dated 20 May 2023 stating EPA has received the Annual Return				
G212	EPL21636	E2.2	Environmental obligations of licensee	In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purpose to which the licence relates) must:	Record	10/07/2023: Interview: Remondis (RM) stated that no incident of such nature has occurred onsite since the commencement of operation.				
				a) make all efforts to contain all firewater on the licensee's premises,	Record	10/07/2023: Interview: Remondis (RM) stated that no incident of such nature has occurred onsite since the commencement of operation.				
				b) make all efforts to control air pollution from the licensee's premises,	Record	10/07/2023: Interview: Remondis (RM) stated that no incident of such nature has occurred onsite since the commencement of operation.				
				c) make all efforts to contain any discharge, spill or run-off from the licensee's premises,	Record	10/07/2023: Interview: Remondis (RM) stated that no incident of such nature has occurred onsite since the commencement of operation.				
				d) make all efforts to prevent flood water entering the licensee's premises,	Record	10/07/2023: Interview: Remondis (RM) stated that no incident of such nature has occurred onsite since the commencement of operation.				
				e) remediate and rehabilitate any exposed areas of soil and/or waste,	Record	10/07/2023: Interview: Remondis (RM) stated that no incident of such nature has occurred onsite since the commencement of operation.				
				f) lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of,	Record	10/07/2023: Interview: Remondis (RM) stated that no incident of such nature has occurred onsite since the commencement of operation.				
				g) at the request of the EPA, monitor groundwater beneath the licensee's premises, and its potential to migrate from the premises,	Record	10/07/2023: Interview: Remondis (RM) stated that no incident of such nature has occurred onsite since the commencement of operation.				
				h) at the request of the EPA monitor surface water leaving the licensee's premises; and	Record	10/07/2023: Interview: Remondis (RM) stated that no incident of such nature has occurred onsite since the commencement of operation.				
G213	EPL21636	E2.3	Environmental obligations of licensee	After the licensee's premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must:	Record	10/07/2023: This site has commenced operation in August 2022. This condition has not triggered.				
				a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; and	Record	10/07/2023: This site has commenced operation in August 2022. This condition has not triggered.				
G214	EPL21636	E3.1	Additions to the definition of terms for the licence	Remediation works means the removal of stockpiled wastes and lead impacted soils, consolidation of zinc impacted soils, installation of a geotextile membrane over the truck parking area and implementation of a long-term environmental management plan, as described in the RAP.	Record	10/07/2023: Record sighted: - GHD (20 May 2022) Site Audit Report, which contains a copy of the LTEMP				
				RAP means Remediation Action Plan prepared by JM Environments dated 17 July 2021 (DOC21/497894-18). ANZECC means Australian and New Zealand Guidelines for Fresh and Marine Water Quality (as in force from time to time).						

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<b>Energy from Waste Management Plan (EWMP). Requirement for testing by 3rd party receiving the RDF is not listed here as it is outside the scope of this IEA.</b>																																					
G215 (see also G151 and G34)	Energy from Waste Management Plan (EWMP)	5	DESIGN COMPLIANCE WITH TABLE 4 OF THE NSW EFW POLICY	<p>REMONDIS has designed the manufacture of the RDF (Refuse Derived Fuels) consistent with the requirements of the requirements set out in Table 4 of the NSW Energy from Waste Policy.</p> <table border="1"> <thead> <tr> <th>Waste Stream</th> <th>REMONDIS Tonnes</th> <th>% Residual Waste Allowed for Energy Recovery</th> <th>Total Tonnes Allowed for Energy Recovery</th> </tr> </thead> <tbody> <tr> <td>Mixed C&amp;I waste</td> <td>9,300</td> <td>50%</td> <td>4,650</td> </tr> <tr> <td>C&amp;I waste where a business has separate collection systems for all relevant waste streams</td> <td>5,380</td> <td>100%</td> <td>5,380</td> </tr> <tr> <td>C&amp;D</td> <td>12,400</td> <td>25%</td> <td>3,100</td> </tr> <tr> <td><b>Total Allowable</b></td> <td><b>27,080</b></td> <td><b>N/A</b></td> <td><b>13,130</b></td> </tr> <tr> <td>RDF Manufacture Equipment Design</td> <td>N/A</td> <td>N/A</td> <td>15,500</td> </tr> <tr> <td>Excess Compliant Waste for RDF above equipment design</td> <td>N/A</td> <td>N/A</td> <td>1,550</td> </tr> </tbody> </table>	Waste Stream	REMONDIS Tonnes	% Residual Waste Allowed for Energy Recovery	Total Tonnes Allowed for Energy Recovery	Mixed C&I waste	9,300	50%	4,650	C&I waste where a business has separate collection systems for all relevant waste streams	5,380	100%	5,380	C&D	12,400	25%	3,100	<b>Total Allowable</b>	<b>27,080</b>	<b>N/A</b>	<b>13,130</b>	RDF Manufacture Equipment Design	N/A	N/A	15,500	Excess Compliant Waste for RDF above equipment design	N/A	N/A	1,550	Record	10/07/2023: Interview: Remondis (RM & EL) stated that not triggered - Energy from Waste has not commenced onsite.			
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G216	Energy from Waste Management Plan (EWMP)	6.1	Site Entry	<p>REMONDIS' on-site weighbridge will be calibrated. To provide transparent reporting based on the weighbridge data, REMONDIS will classify each load at the point of accepting the waste over the weighbridge and will arrange for these codes to be available in the weighbridge recording software. This will ensure that collected data is correctly identified both on the incoming waste docket and within the reporting system.</p> <p>For Building 1 Materials Recycling Facility (MRF), classification is C&amp;I or C&amp;D (Commercial and industrial or Construction and demolition)</p>	Record	10/07/2023: Interview: Remondis (RM & EL) stated that not triggered - Energy from Waste has not commenced onsite.																															
G217	Energy from Waste Management Plan (EWMP)	6.1	Site Entry	<p>At the verified weighbridge on entry into the facility, trained personnel must:</p> <ol style="list-style-type: none"> <li>Inspect the entire top of each load from an elevated inspection point or by using a video camera connected to a monitor and determine whether the load contains any asbestos waste and any other unpermitted waste;</li> <li>Where the load is identified as containing, or is reasonably suspected to contain, any asbestos waste, reject the entire load of waste by directing the driver to immediately leave the facility and record the information required in 022-ENV-FO-003 Rejected Load Register; and</li> <li>Where the load is not rejected, direct the driver and the load of waste to proceed directly to the unloading area.</li> </ol>	Observation	10/07/2023: Interview: Remondis (RM & EL) stated that not triggered - Energy from Waste has not commenced onsite.																															
G218	Energy from Waste Management Plan (EWMP)	6.2	Load Inspection and Unloading	<p>At inspection point 2 – tip and spread inspection area (inside Building 1), trained personnel must:</p> <ol style="list-style-type: none"> <li>Direct the driver of the vehicle to tip the entire load on the tip and spread inspection area;</li> <li>Spread the entire load and inspect the visible surface area for any asbestos waste and any other unpermitted waste;</li> <li>Manually turn, or direct a plant operator to turn, the entire load and inspect the entire load for any asbestos waste and any other unpermitted waste on or beneath the visible surface;</li> <li>Where any asbestos waste is identified, reject the entire load of waste.</li> <li>Where any other unpermitted waste is identified as per Section 4.3 below, remove that waste from the load or reject the entire load of waste.</li> <li>Where a load is rejected under Section 4.3, ensure that the entire load is immediately reloaded onto the vehicle in which it arrived or onto another vehicle and ensure that the vehicle with the rejected load leaves the facility on the same business day and then immediately record the information in the 022-ENV-FO-003 Rejected Load Register; and</li> </ol> <p>REMONDIS personnel will also be trained to identify and remove any of the following contaminants:</p> <ul style="list-style-type: none"> <li>iodine, pharmaceutical, pesticide and biocide products in any formulation except as a constituent of another material</li> <li>radioactive, nuclear, hospital, or clinical waste; and</li> <li>explosive materials including propellants and cartridges.</li> </ul> <p>Waste materials suitable for processing will then be loaded into a hopper of the sorting plant for separation by material type:</p> <ul style="list-style-type: none"> <li>Recovered fines;</li> <li>Shredded wood;</li> <li>Heavies (concrete/brick/tile);</li> <li>Plastics;</li> <li>PVC</li> <li>Loose refuse-derived fuel (RDF);</li> </ul>	Observation	10/07/2023: Interview: Remondis (RM & EL) stated that not triggered - Energy from Waste has not commenced onsite.																															
G219	Energy from Waste Management Plan (EWMP)	6.4	Waste Storage	All waste outputs will be stored in separate storage areas. RDF will be stored in a dedicated, signposted area and exported for recycling after testing as required by the receiving facility.	Observation	10/07/2023: Interview: Remondis (RM & EL) stated that not triggered - Energy from Waste has not commenced onsite.																															
G220	Energy from Waste Management Plan (EWMP)	7.1.3	Quarterly EPA Reporting	$\text{Allowable RDF (\%)} = \frac{0.5 \times C\&I \text{ up to } 50\% + C\&I \text{ no limit} + 0.25 \times C\&D}{\text{Total MRF Tonnes}}$ <p>REMONDIS will use the above methodologies to calculate a total allowable RDF for manufacture and provide the measured tonnes produced for submission to the EPA on a <b>quarterly basis</b>. REMONDIS will work with the EPA to agree an appropriate timeframe for the EPA to review and provide feedback on this reporting.</p>	Record	10/07/2023: Interview: Remondis (RM & EL) stated that not triggered - Energy from Waste has not commenced onsite.																															
<b>Waste Minimisation and Management Plan (WMMP)</b>																																					
G221	Waste Minimisation and Management Plan (WMMP)	4.3.1	Materials Recycling Facility	Transport areas will be kept clean to avoid tracking waste.	Observation	10/07/2023: Observation: - Transport areas were observed to be clean.																															
G222	Waste Minimisation and Management Plan (WMMP)	4.3.2	Cardboard Baling Facility	Up to 1,000 tonnes of baled and stacked cardboard bales are stored within the storage area; bales up to 4 in height are stored in this area of periodic transport off site for recycling. Bales are to be stacked with Forklift	Observation	10/07/2023: Observation: - Bales of cardboard were observed to be up to 4m high.																															
G223	Waste Minimisation and Management Plan (WMMP)	4.3.3.1	Drill mud receipt sampling and analysis	Prior to waste being received and unloaded, a sample of each load will be taken and tested to ensure no unsuitable contaminants are present. Laboratory testing of samples will be done in accordance with the requirements of the NSW EPA's Treated Drilling Mud Order 2014.	Record	10/07/2023: Interview: Remondis (EL) confirmed that drill mud recycling program has not commenced.																															
G224	Waste Minimisation and Management Plan (WMMP)	4.3.3.2	Liquid waste disposal	The liquid waste from the Drill Mud Recycling Facility will be transported via bulk tanker to the following Hunter Water treatment plants for disposal in accordance with Item 6 of existing Tankering Agreement (dated 28/09/20): • Kurri Kurri; • Dora Creek; • Raymond Terrace; • Morpeth; and • Egdeforth	Record	10/07/2023: Interview: Remondis (EL) confirmed that drill mud recycling program has not commenced.																															

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G225	Waste Minimisation and Management Plan (WMMP)	4.3.3.3	Drill mud solids recycling	<p>Dewatered solids (soil) will be transferred into a hook lift bin and moved to the dewatered drill mud storage area for sampling and analysis to confirm compliance with the Treated Drilling Mud Order 2014 before being exported for beneficial reuse as per the Treated Drilling Mud Exemption 2014. Samples will be analysed for the chemicals and other attributes listed in</p> <p><b>Table 4.3. Chemical analytes for Treated Drilling Mud Order 2014.</b></p> <table border="1"> <thead> <tr> <th>Chemicals and other attributes</th> <th>Maximum average concentration (mg/kg 'dry weight' unless otherwise specified)</th> <th>Absolute maximum concentration (mg/kg 'dry weight' unless otherwise specified)</th> </tr> </thead> <tbody> <tr> <td>Mercury</td> <td>0.5</td> <td>1</td> </tr> <tr> <td>Cadmium</td> <td>0.5</td> <td>1</td> </tr> <tr> <td>Lead</td> <td>50</td> <td>100</td> </tr> <tr> <td>Arsenic</td> <td>20</td> <td>40</td> </tr> <tr> <td>Chromium (total)</td> <td>50</td> <td>100</td> </tr> <tr> <td>Copper</td> <td>50</td> <td>100</td> </tr> <tr> <td>Nickel</td> <td>30</td> <td>60</td> </tr> <tr> <td>Zinc</td> <td>100</td> <td>200</td> </tr> <tr> <td>Electrical Conductivity</td> <td>1.5 dS/m</td> <td>3 dS/m</td> </tr> <tr> <td>pH *</td> <td>6 to 9</td> <td>5.5 to 10</td> </tr> <tr> <td>Total Polycyclic Aromatic Hydrocarbons (PAHs)</td> <td>20</td> <td>40</td> </tr> <tr> <td>Benzo(a)pyrene</td> <td>0.5</td> <td>1</td> </tr> <tr> <td>Total Petroleum Hydrocarbons (TPHs)</td> <td>250</td> <td>500</td> </tr> <tr> <td>Total Chlorinated Hydrocarbons</td> <td>0.5</td> <td>1</td> </tr> </tbody> </table> <p>*Note: The ranges given for pH are for the minimum and maximum acceptable pH values in the treated drilling mud.</p>	Chemicals and other attributes	Maximum average concentration (mg/kg 'dry weight' unless otherwise specified)	Absolute maximum concentration (mg/kg 'dry weight' unless otherwise specified)	Mercury	0.5	1	Cadmium	0.5	1	Lead	50	100	Arsenic	20	40	Chromium (total)	50	100	Copper	50	100	Nickel	30	60	Zinc	100	200	Electrical Conductivity	1.5 dS/m	3 dS/m	pH *	6 to 9	5.5 to 10	Total Polycyclic Aromatic Hydrocarbons (PAHs)	20	40	Benzo(a)pyrene	0.5	1	Total Petroleum Hydrocarbons (TPHs)	250	500	Total Chlorinated Hydrocarbons	0.5	1	Record	10/07/2023: Interview: Remondis (EL) confirmed that drill mud recycling program has not commenced.			
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G226	Waste Minimisation and Management Plan (WMMP)	4.3.3.4	Environmental Management Practices	<p>Drill mud handling – transfer of contents of tanker truck to and from the storage tanks</p> <ul style="list-style-type: none"> <li>The area for loading and off-loading drill muds will occur fully indoors within the designated bunded area of Building 2;</li> <li>Tankers will be provided with automatic shut-off mechanisms;</li> <li>Valves will be kept closed unless manually opened during transfer;</li> <li>Shut-off valves used in the transfer of liquids should be of the quick-closing type;</li> <li>Hatches, manholes or covers on all tankers should be kept closed, except during loading and unloading operations;</li> <li>Transfer pumps should be provided with emergency shut-down devices;</li> <li>Hoses should be purged before uncoupling;</li> <li>Overfill protection devices should be regularly inspected; and</li> <li>Regular inspections should be undertaken for losses or leaks, and valves, pumps, couplings and seals should be maintained regularly.</li> </ul> <p>Bulk storage of drill mud in tanks</p> <ul style="list-style-type: none"> <li>Tanks will be provided with suitable vents to enable the safe discharge of displaced volatile air emissions during loading and unloading;</li> <li>Storage tanks will be provided with overfill protection and alarms; and</li> <li>Leak detection tests on tanks, distribution lines and seals will be conducted regularly.</li> </ul> <p>Spill and bunding requirements</p> <ul style="list-style-type: none"> <li>The 2 x 50,000L storage tanks will be internally bunded or will be provided with secondary containment bunding such that the compound (area where the two tanks are stored) will contain a spill equivalent to the volume of one tank (50,000L);</li> <li>The floors of bulk storage facilities will be designed to withstand the hydrostatic pressure exerted when tanks are full;</li> <li>The containment system will be compatible with the liquid being stored and provide an impervious barrier to prevent spills from discharging outside the containment system;</li> <li>Any pipes connected to the storage tanks will be located over the containment system. If a pipe passes through a wall, the joint should be sealed to prevent leakage;</li> <li>All fixed tanks will be provided with a suitable overflow system that discharges to an area within the bund wall or to a collection or holding point;</li> <li>Any valve used for draining a storage compound should be located outside the bund wall;</li> <li>The valve should have clear open and closed positions and be compatible with the liquid contained. The valve should normally be closed except during drainage;</li> <li>Storage tanks should be fitted with level indicators. Where the level inside the tank is not continuously visible to the person filling the tank, a high-level alarm should be fitted to prevent overflow;</li> <li>All tanks and storage compounds will be inspected and maintained regularly, and the tanks' integrity should be tested at least every 5 years;</li> <li>Tanks will be properly labelled and have Material Safety Data Sheets available in the work area;</li> <li>Contaminated water and other waste (spill materials) from the clean-up of spills must be collected and disposed of in accordance with EPA requirements.</li> </ul>	Observation	10/07/2023: Interview: Remondis (EL) confirmed that drill mud recycling program has not commenced.																																																

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G227	Waste Minimisation and Management Plan (WMMP)	4.3.6.1	Environmental management practices – liquid wastes	<p>Oil (J100) and Oily water (J120) (Item 14 in Figure 3.4, under awning, including 2 x 69,000L internally bunded Trans Tanks in Figure 3.5)</p> <p>(a) Transfer of contents of trucks to and from the storage tanks</p> <ul style="list-style-type: none"> <li>Oil and oily water is to be pumped into designated holding tanks. These tanks are contained within the fully bunded area, with good ventilation;</li> <li>Tankers will be provided with automatic shut-off mechanisms;</li> <li>Valves will be kept closed unless manually opened during transfer;</li> <li>Shut-off valves used in the transfer of liquids should be of the quick-closing type;</li> <li>Hatches, manholes or covers on all tankers should be kept closed, except during loading and unloading operations;</li> <li>Drums or containers to be used to catch any drips from hoses before or after decanting;</li> <li>Transfer pumps should be provided with emergency shut-down devices;</li> <li>Hoses should be purged before uncoupling;</li> <li>Overfill protection devices should be regularly inspected;</li> <li>Regular inspections should be undertaken for losses or leaks, and valves, pumps, couplings and seals should be maintained regularly.</li> </ul> <p>(b) Bulk storage in tanks</p> <ul style="list-style-type: none"> <li>Tanks will be provided with suitable vents to enable the safe discharge of displaced volatile air emissions during loading and unloading; and should have a vapour disposal or recovery system installed where necessary;</li> <li>Storage tanks will be provided with overfill protection and alarms; and</li> <li>Leak detection tests on tanks, distribution lines and seals will be conducted regularly.</li> </ul> <p>(c) Spill and bunding requirements</p> <ul style="list-style-type: none"> <li>Storage tanks are located in a tank farm that will have bunding for at least 100% of the largest tank;</li> <li>The floors of bulk storage facilities will be designed to withstand the hydrostatic pressure exerted when tanks are full;</li> <li>The containment system will be compatible with the liquid being stored and provide an impervious barrier to prevent spills from discharging outside the containment system;</li> <li>Any pipes connected to the storage tanks will be located over the containment system. If a pipe passes through a wall, the joint should be sealed to prevent leakage;</li> <li>All fixed tanks will be provided with a suitable overflow system that discharges to an area within the bund wall or to a collection or holding point;</li> <li>Any valve used for draining a storage compound should be located outside the bund wall;</li> <li>The valve should have clear open and closed positions and be compatible with the liquid contained. The valve should normally be closed except during drainage;</li> <li>Storage tanks should be fitted with level indicators. Where the level inside the tank is not continuously visible to the person filling the tank, a high-level alarm should be fitted to prevent overflow;</li> <li>All tanks and storage compounds will be inspected and maintained regularly, and the tanks' integrity should be tested at least every 5 years;</li> <li>Tanks will be properly labelled and have Material Safety Data Sheets available in the work area;</li> <li>Vehicles will move between storage areas in a manner that prevents the tracking of contamination from one area to another;</li> <li>All storage areas will be secured against unauthorised entry;</li> <li>Adequate supplies of spill response equipment should be maintained in accessible locations. These are to be checked on a weekly basis and replenished with new supplies immediately after use; and</li> <li>Contaminated water and other waste (spill materials) from the clean-up of spills must be collected and disposed of in accordance with EPA requirements.</li> </ul>	Record, observation	<p>10/07/2023:</p> <ul style="list-style-type: none"> <li>See Item G76</li> <li>See Item G122 on liquid chemicals.</li> </ul>															
					Record, observation	<p>10/07/2023:</p> <ul style="list-style-type: none"> <li>See Item G76</li> <li>See Item G122 on liquid chemicals.</li> </ul> <p>Interview:</p> <ul style="list-style-type: none"> <li>Remondis (PW) stated no spills have occurred.</li> <li>Security patrol is available onsite.</li> </ul> <p>Observation:</p> <ul style="list-style-type: none"> <li>The gates to the main buildings are locked, The reception building is locked after hours.</li> </ul>															
G228	Waste Minimisation and Management Plan (WMMP)	4.7	Waste storage, identification, and stockpile heights	<ul style="list-style-type: none"> <li>Stockpiles of waste materials in the designated waste storage area will be limited to 3m. Height guidance will be provided within the 4m height of the concrete block bays;</li> <li>Where stockpiles of sorted waste materials or residual waste are contained in hook lift bins, the height of waste in these bins will not exceed the rim of the bin;</li> <li>Cardboard bales in one tonne blocks will be stored to a maximum height of 4m in Building 1 within the dedicated cardboard bale storage area.</li> </ul>	Observation	<p>10/07/2023:</p> <p>Observation:</p> <ul style="list-style-type: none"> <li>Stockpiles of waste were observed to be less than 3m.</li> <li>Cardboard bales were stored to a maximum height of 4m in Building 1.</li> <li>Stockpiles in bins did not exceed the rim of the bin.</li> </ul>															
G229	Waste Minimisation and Management Plan (WMMP)	7.1	Inspections and monitoring	<p>Regular monitoring will be undertaken to track waste management on site. This will be through a series of formal and informal inspections at regular intervals (Table 7.1).</p> <p><i>Table 7.1. Waste monitoring and review schedule.</i></p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Resources</th> <th>Responsibility</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Environmental Inspection</td> <td>Site Inspection Checklist</td> <td>Operations Manager</td> <td>Monthly</td> </tr> <tr> <td>Waste removal activities off site</td> <td>Monthly Register for Waste Materials</td> <td>Operations Manager</td> <td>Monthly</td> </tr> </tbody> </table>	Activity	Resources	Responsibility	Frequency	Environmental Inspection	Site Inspection Checklist	Operations Manager	Monthly	Waste removal activities off site	Monthly Register for Waste Materials	Operations Manager	Monthly	Record	<p>10/07/2023:</p> <p>Record sighted:</p> <ul style="list-style-type: none"> <li>Weightbridge record through Clearweigh for June 2023.</li> <li>Weekly inspection record 11/5/23, 10/3/23</li> <li>Waste Minimisation and Management Plan was updated (on 8 September 2023) and inspections frequencies were updated to monthly, instead of weekly and daily.</li> </ul> <p>Interview 5/10/2023:</p> <ul style="list-style-type: none"> <li>Remondis (EL and RM) states that following the change, the plans will be submitted to DPE.</li> </ul>			
Activity	Resources	Responsibility	Frequency																		
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G230	Integrated Management Plan (IMP)	11.11	Standard Operating Procedures	SOP must be utilised by the site as the safe system of work	Record	<p>10/07/2023:</p> <p>Record sighted:</p> <ul style="list-style-type: none"> <li>Examples of SOP (Nespresso Coffee Pod Processing Procedure) sighted.</li> </ul>															
G231	Integrated Management Plan (IMP)	11.12	Personal Protective Equipment	Approved PPE will be accessible to all personnel at all times. All PPE shall be in sound and serviceable condition and be replaced on a fair, wear and tear basis.	Observation	<p>10/07/2023: Observation:</p> <ul style="list-style-type: none"> <li>Appropriate PPEs were observed.</li> </ul>															
G232	Integrated Management Plan (IMP)	11.15	Plant and Equipment	No personnel will operate a plant/equipment for which they are not trained, licensed or competent to use. High risk plant/ equipment used on site has a pre-start checklist which is completed each day prior to use. All appropriate JSEA/SWMS and standard operating procedures are adhered to when using the plant/equipment. Copies of these items shall be kept on site within the filing system and registered on the license matrix.	Record	<p>10/07/2023:</p> <p>Record sighted:</p> <ul style="list-style-type: none"> <li>Examples of SOP (Nespresso Coffee Pod Processing Procedure) sighted.</li> <li>Operate A Forklift Assessment for a staff (signed off).</li> <li>Risk Assessment for Forklift for a staff (signed off).</li> <li>Forklift licence.</li> <li>Work Instructions for various waste streams.</li> </ul>															
G233	Integrated Management Plan (IMP)	11.19 and 12.4	Noise and Noise Control	<ul style="list-style-type: none"> <li>Occupational noise monitoring will be conducted following the commissioning of all equipment</li> <li>Equipment which is used intermittently will be shut down when not in use</li> <li>Where noise monitoring results show an exceedance of the safe working levels, hearing protection will be supplied to all personnel working in the area. Training on the use and purpose of the PPE will be provided.</li> <li>Audiometric testing for each employee that is required to wear hearing protection on a regular basis will be carried out bi-annually by an external consultant.</li> </ul>	Record	<p>10/07/2023:</p> <p>Record sighted:</p> <ul style="list-style-type: none"> <li>Intercity Hearing Safety (15 Dec 2022) Noise Survey.</li> <li>Remondis (SH) confirmed employees are required to wear hearing protection when working at high risk equipment.</li> </ul>															

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G234	Integrated Management Plan (IMP)	11.20 and 11.21	Pre-employment Medicals  Health Monitoring	All REMONDIS employees who are to work on site for a period in excess of one week over the duration of a Contract will have to complete a pre-employment medical examination with a REMONDIS preferred provider, prior to commencing work on the site. An Occupational Physician will carry out the medical examination. "Fitness for Duty" reports prepared by the Occupational Physician for REMONDIS employees will be forwarded to the Safety & HR Team prior to commencing work on the site. Any risks and/or restrictions identified in the report will be assessed by the site designated HSEQ Advisor and the Site Manager, to determine if the employee can perform the inherent duties safely and to manage and minimise the risk and/or restriction identified.  Table 5: Tomago Health Monitoring Requirements <table border="1"> <thead> <tr> <th>Hazard to be Monitored</th> <th>Location</th> <th>Employees Exposed</th> <th>Record</th> <th>Frequency</th> <th>Responsible Person</th> </tr> </thead> <tbody> <tr> <td>Hepatitis A</td> <td>Operations</td> <td>All</td> <td>Record of Vaccination</td> <td>Commencement of employment then to immunity stage</td> <td>Site Manager</td> </tr> <tr> <td>Hepatitis B</td> <td>Operations</td> <td>All</td> <td>Record of Vaccination</td> <td>Commencement of employment then to immunity stage</td> <td>Site Manager</td> </tr> <tr> <td>Tetanus</td> <td>Operations</td> <td>All</td> <td>Record of Vaccination</td> <td>Commencement of employment then every 10 years</td> <td>Site Manager</td> </tr> <tr> <td>Noise</td> <td>Operations</td> <td>Those employees that are required to wear hearing protection in their daily tasks.</td> <td>Audiogram</td> <td>Within 3 months of employment and every two years thereafter</td> <td>Site Manager</td> </tr> <tr> <td>Fitness to Drive</td> <td>Operations</td> <td>Heavy Vehicle Drivers</td> <td>Commercial Drivers Medical (to NTC Standard)</td> <td>Annual for drivers 50 and over Every 3 years for drivers 49 and under</td> <td>Site Manager</td> </tr> <tr> <td>COVID-19</td> <td>All</td> <td>All</td> <td>Record of vaccination</td> <td>Commencement of employment, then as required by State Government guidelines.</td> <td>Site Manager</td> </tr> </tbody> </table>	Hazard to be Monitored	Location	Employees Exposed	Record	Frequency	Responsible Person	Hepatitis A	Operations	All	Record of Vaccination	Commencement of employment then to immunity stage	Site Manager	Hepatitis B	Operations	All	Record of Vaccination	Commencement of employment then to immunity stage	Site Manager	Tetanus	Operations	All	Record of Vaccination	Commencement of employment then every 10 years	Site Manager	Noise	Operations	Those employees that are required to wear hearing protection in their daily tasks.	Audiogram	Within 3 months of employment and every two years thereafter	Site Manager	Fitness to Drive	Operations	Heavy Vehicle Drivers	Commercial Drivers Medical (to NTC Standard)	Annual for drivers 50 and over Every 3 years for drivers 49 and under	Site Manager	COVID-19	All	All	Record of vaccination	Commencement of employment, then as required by State Government guidelines.	Site Manager	Record	10/07/2023: Record sighted: - Pre-employment medication records for new employees were sighted. Interview: - Remondis (EL and RM) confirmed they have completed a pre-employment medicals.			
Hazard to be Monitored	Location	Employees Exposed	Record	Frequency	Responsible Person																																														
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G235	Integrated Management Plan (IMP)	12.1	Monitoring and Recording	A monthly site inspection will be conducted and recorded in DONESAFE using the 022-SYS-FO-001 Tomago Workplace Inspection Form. This has been tailored to reflect the requirements of the site and its environmental licence.	Record	10/07/2023: Record sighted: - Weekly inspection completed and recorded in Donesafe																																													
G236	Integrated Management Plan (IMP)	12.3.2	Dust Control	- all processing activities will be conducted inside the buildings - the site is hardstand - weekly street sweeper conducted by a third party - trucks entering and leaving the premises that are carrying loads will be covered	Observation	10/07/2023: Observation No unacceptable dust generating activities were observed.																																													
G237	Integrated Management Plan (IMP)	12.6.1	Waste Reveal – Onsite Weighbridge	National Measurement Institute calibrated weighbridge which serves as the entry and exit point for vehicles on and off site.	Record	10/07/2023: Observation: - A weighbridge was observed.  Record sighted: - NSW Nuweigh, calibration record of the weighbridge (18/2/2023).																																													
G238	Integrated Management Plan (IMP)	12.6.2	Waste Reveal – Ensuring Compliance with Waste Received	The site is not licenced to receive or store asbestos waste	Record	10/07/2023: - Remondis (RM) confirmed that they do not accept asbestos and C&D wastes. - Remondis (PW) stated that no construction waste has been received. Weighbridge operator conducts checks of the load as the truck comes into the site, and then as the material is received the material is spread within the building for inspection. Any asbestos would be removed and work would be stopped, but no asbestos has been identified to date.																																													
G239	Integrated Management Plan (IMP)	12.7	Hazardous Chemicals	- All activities with regards to hazardous chemicals will be conducted inside the buildings and in engineered bunded areas - A register of the chemicals located onsite is maintained in ChemAlert - Quickbreaks are installed on diesel and Adblue hoses - Chemical spill kits located in areas in liquid waste and chemical storage areas - Spill training conducted	observation	10/07/2023: Interview: Remondis (PW) stated that all chemical handling is conducted inside the buildings and in bunded areas.  Observation: - Chemical spill kits were observed.  Record sighted: - ChemAlert was sighted. SDS for diesel was observed. - Toolbox Topic #28- Spill Control conducted on 13 July 2023 for VB 11 July 2023 for WP, CN & TW 12 July 2023 for MG, SC, SG & MW 14 July 2023 for AB 20 July 2023 for CM - Email correspondences from Remondis (PW) on 4, 7, 18 September 2023 and 3 October 2023 to Global Engineering Solutions to install Quickbreaks.	This item is considered as a non-compliance because the installation of Quickbreaks is incomplete.  <b>Recommendation: Installation of Quickbreaks on diesel and Adblue hoses should be completed.</b>																																												

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G240	Integrated Management Plan (IMP)	12.9	Fire	<ul style="list-style-type: none"> <li>- Onsite smoke detectors</li> <li>- Onsite thermal cameras</li> <li>- Thermal surveys conducted on electrical equipment</li> <li>- Spark arrest equipment fitted on mobile plants</li> <li>- Each building is bunded providing onsite fire water retention within the buildings.</li> <li>- Drain wardens will be purchased</li> </ul>	Observation	<p>10/07/2023: Record sighted: - Occupation certificate 2 includes fire certification, which includes fire detection. - NDT Services Group (8 May 2023) Infrared Thermography Survey Remondis Tomago.</p> <p>Observation: - The buildings are self bunded to retain fire water.</p> <p>Interview: - Remondis (SH) stated that thermal cameras were available onsite. - Remondis (RM) stated that "Modern equipment as with the ones at Tomago no longer requires Spark Arrests as the design no longer requires the addition"</p> <p>7/9/2023: - Remondis (RM) advised that "Drain wardens are currently being installed". Record sighted: - PO (RP0040423) 6 September 2023 to BULBECK ENVIRO PTY LTD for a purchase of "Drain Warden 1.2mx1.2m skirt,55cm basin complete w/75mm bilge rat"</p>	<p><b>Recommendation:</b> Please consider revising the Integrated Management Plan (IMP) to reflect the fact that all mobile plants no longer require to be fitted by spark arrest equipment.</p>																					
G241	Integrated Management Plan (IMP)	14.1	Induction	<p>The Workplace shall ensure that:</p> <ul style="list-style-type: none"> <li>- Induction information manual/s is/are developed and issued for all inductions to Staff, Employees, Labour Hire, Contractors and visitors,</li> <li>- All Staff, Employees, Labour Hire, Contractors are inducted at the Workplace prior to being permitted to commence work.</li> <li>- Induction records for Staff, Employees, Labour Hire, Contractors operating within the project are maintained.</li> </ul> <p>The Induction records for each site are saved within the HSEQ Management System filing under Training &amp; Induction.</p>	Record	<p>10/07/2023: Record sighted: - Tomago Resource Recovery Facility Site Induction - Tomago Visitor and Contractor Induction</p>																						
<b>Water Management Plan (WMP)</b>																												
G242	Water Management Plan (WMP)	3.2.1	Wastewater Management Leachate, Firewater & Oil Spill Management	<ul style="list-style-type: none"> <li>- Building 1 – floor area of 5325m2, depth of 51m3 equal to minimum 10mm bund wall around the inside perimeter of the building and at each building exit;</li> <li>- Building 2 – floor area of 3239m2, depth of 51m3 equal to minimum 16mm bund wall around the inside perimeter of the building and at each building exit; and</li> <li>- Building 3 has no specific firefighting requirements. However, it is assumed that 1 x fire hose reel will operate for 20 minutes, generating 270 litres (50% evaporation rate applied to 540 litres) of firewater. This will require a 5 mm bund wall around the inside perimeter of the building and at each building exit.</li> <li>- Firewater and contaminated wash water will be contained within the bunded areas of the buildings and sampled for testing at a NATA certified laboratory.</li> </ul>	Record, observation	<p>10/07/2023: Observation: Bund walls were observed in each building.</p> <p>Interview: No fire has occurred inside buildings so no fire water release has occurred.</p>																						
G243	Water Management Plan (WMP)	3.2.1	Wastewater Management Leachate, Firewater & Oil Spill Management	<ul style="list-style-type: none"> <li>- Run-off from the truck wash will be collected by existing floor sumps that will drain the water to a pit in the shed on the northern side of the maintenance workshop. Collected water will be treated in an oil and water separator and pumped to a 10kL holding tank located nearby.</li> <li>- The tank will be periodically pumped out, with treated water sent for off-site recycling in accordance with REMONDIS' existing Tankering Agreement with Hunter Water.</li> <li>- Wastewater, which may contain small amounts pollutants from the waste material handled by the trucks will be stored and transported off-site as trade waste to be treated and disposed at a licenced facility.</li> </ul>	Record, observation	<p>10/07/2023: Interview: - Remondis (PW) stated that truck run-off are collected and treated in an oil and water separator. Treated water was collected inside a holding tank (observed), which is disposed offsite. The oil is also disposed offsite.</p> <p>Record sighted: - Cleanaway Discharge Information for J120 and N205 Loads (dated 5/7/2023).</p>																						
G244	Water Management Plan (WMP)	3.2.1	Drill Mud extracted water	<ul style="list-style-type: none"> <li>- Wastewater is generated from the extraction of the drill muds at the Drill Mud Recycling Facility. This generated wastewater (estimated to be 5,000 tpa) is then exported off-site to a Hunter Water treatment facility for disposal as trade waste.</li> </ul>	Record	<p>10/07/2023: Interview: Remondis (RM &amp; EL) stated that no drill mud waste has been received.</p>																						
G245	Water Management Plan (WMP)	3.2.1	Sewer Management	<ul style="list-style-type: none"> <li>- The site is currently serviced by an Envirocycle M23 on-site sewer treatment system. AWTS Maintenance Services Pty Ltd performed a condition assessment of the existing sewer and advised that the system was found to be in reasonable condition and provided recommendations to replace or repair broken or failed components.</li> <li>- Treated water is then stored onsite in a separate holding tank and periodically taken offsite via a pump-out truck. No on-site disposal methods</li> <li>- Should it be observed that the system is undersized, there are a number of options to augment the existing system. This can be achieved by providing additional onsite storage tanks for the temporary storage of pre and post treatment water, or by increasing the frequency of which the treated sewage is removed from site.</li> </ul>	Record	<p>10/07/2023: Record sighted: - Remondis docket for septic pump out for 18 August 2023, 19 and 5 September 2023,</p> <ul style="list-style-type: none"> <li>- AWTS Service Report for service on 8 November 2022 (INV201587 CN 10149) Model M23+1, 3 tanks. Blower E100. Pump RUS155</li> <li>- AWTS Service Report for service on 3 Feb 2023 (INV205807 CN 10149) Model M23+1, 3 tanks. Blower E100. Pump RUS155</li> <li>- AWTS Service Report for service on 10 Apr 2023 (INV204736 CN10149) Model M23+1, 2 tanks. Blower E100. Pump RUS155</li> <li>- AWTS Service Report for service on 7 Aug 2023 (INV209252 CN10149) Model M23+1, 2 tanks. Pump Premu28</li> </ul>																						
G246	Water Management Plan (WMP)	4.2 and 6.1	Surface Water Monitoring Program	<ul style="list-style-type: none"> <li>- On-Site Detention Basin Operation. OSD / infiltration area on the north-eastern boundary of the Site utilises void forming storage units (Atlanta Flo-Tanks) wrapped in permeable geotextile allowing infiltration of stormwater into the natural soils at the base of the tank.</li> <li>- Maintenance and use of the OSD shall be in accordance with local standards, the regulatory authority and AS/NZS 3500 (Plumbing and Drainage). The supplier has provided advice that the system does not need ongoing maintenance after installation, and approved by the authorized engineer to suit requirements</li> <li>- Any surface water findings shall be included in the Annual Monitoring Report.</li> </ul>	Record	<p>7/09/2023: Interview: - Remondis (RM) advised that "the installer of OSD, Gleeson Civil, said that given the nature of the system there is no requirements or ability to maintain after installation."</p> <p>Record sighted: - An updated Water Management Plan (WMP) (September 2023) showed that maintenance is no longer required.</p>																						
G247	Water Management Plan (WMP)	6.3.1	Surface Water Quality	<p>Table 6 - Trigger values for surface water analytes</p> <table border="1"> <thead> <tr> <th>Surface Water Analyte</th> <th>Units</th> <th>Action Criteria</th> </tr> </thead> <tbody> <tr> <td>pH<sup>1</sup></td> <td>-</td> <td>7.0 – 8.0</td> </tr> <tr> <td>Dissolved oxygen<sup>1</sup></td> <td>% saturation</td> <td>80 – 110</td> </tr> <tr> <td>Electrical conductivity<sup>1</sup></td> <td>µS/cm</td> <td>200 – 300</td> </tr> <tr> <td>Redox potential</td> <td>mV</td> <td>N/A</td> </tr> <tr> <td>Turbidity<sup>1</sup></td> <td>NTU</td> <td>0.5 – 10</td> </tr> </tbody> </table> <p>Surface water will only be tested where required it is noted that generally there is no significant amount of surface water onsite. In periods of heavy rainfall where there is visible pooling then REMONDIS will engage JM Environments to conduct testing on the parameters mentioned in Table 6 and will be recorded.</p> <p>Any surface water monitoring data results collected shall adhere to the Australian and New Zealand 2000 Guidelines for Fresh and Marine Water Quality standard requirements. Any exceedance of these trigger limits will be reported to the NSW EPA and managed within the REMONDIS incident management and reporting framework.</p>	Surface Water Analyte	Units	Action Criteria	pH <sup>1</sup>	-	7.0 – 8.0	Dissolved oxygen <sup>1</sup>	% saturation	80 – 110	Electrical conductivity <sup>1</sup>	µS/cm	200 – 300	Redox potential	mV	N/A	Turbidity <sup>1</sup>	NTU	0.5 – 10	Record	<p>5/10/2023: Record Sighted: - Updated Water Management Plan (WMP) (September 2023) clarifies the requirement for surface water testing requirement.</p> <p>Interview: - Remondis (RM) stated that since the commencement of operation there has been no significant amount of surface water onsite. Hence no surface water testing has been conducted.</p>				
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G248	Water Management Plan (WMP)	6.3.3	Groundwater Quality	<p>Where there are repeated occurrences of groundwater triggers, relevant authorities will be notified, and an investigation will be undertaken to further understand the extent of the issue. A report outlining appropriate mitigation and contingency measures to be implemented shall be prepared and submitted to the relevant agencies within one month of the exceedance being detected.</p> <p>Table 7 - Trigger values for groundwater analyses</p> <table border="1"> <thead> <tr> <th>Groundwater Analyte</th> <th>Units</th> <th>Action Criteria</th> </tr> </thead> <tbody> <tr> <td colspan="3" style="text-align: center;"><b>Physical Parameters</b></td> </tr> <tr> <td>pH</td> <td>-</td> <td>7.0 – 8.0<sup>1</sup></td> </tr> <tr> <td>Dissolved oxygen</td> <td>% saturation</td> <td>80 – 110<sup>1</sup></td> </tr> <tr> <td>Electrical conductivity</td> <td>µS/cm</td> <td>200 – 300<sup>2</sup></td> </tr> <tr> <td>Redox potential</td> <td>mV</td> <td>N/A</td> </tr> <tr> <td>Standing water level</td> <td>metres (Australian height datum)</td> <td>N/A</td> </tr> <tr> <td colspan="3" style="text-align: center;"><b>Dissolved Metals</b></td> </tr> <tr> <td>Arsenic</td> <td>mg/L</td> <td>&gt;0.03<sup>3</sup></td> </tr> <tr> <td>Cadmium</td> <td>mg/L</td> <td>0.0005 – 0.005<sup>3</sup></td> </tr> <tr> <td>Chromium</td> <td>mg/L</td> <td>&gt;0.05<sup>3</sup></td> </tr> <tr> <td>Copper</td> <td>mg/L</td> <td>&gt;0.005<sup>3</sup></td> </tr> <tr> <td>Lead</td> <td>mg/L</td> <td>0.001 – 0.001<sup>3</sup></td> </tr> <tr> <td>Zinc</td> <td>mg/L</td> <td>&gt;0.005<sup>3</sup></td> </tr> <tr> <td colspan="3" style="text-align: center;"><b>PFAS Compounds</b></td> </tr> <tr> <td>Perfluorooctane sulphonate (PFOS)</td> <td>mg/L</td> <td>&gt;0.00013<sup>3</sup></td> </tr> <tr> <td>Perfluorooctanoic acid (PFOA)</td> <td>mg/L</td> <td>&gt;0.22<sup>3</sup></td> </tr> </tbody> </table> <p><small>1. pH, dissolved oxygen and electrical conductivity limits are based on an estuary ecosystem type (ANZECC, 2000). 2. Trigger value is based on toxicant guidelines for the protection of aquatic species in saltwater production (ANZECC, 2000). 3. Trigger value is based on 95% species protection for marine water (PFAS NEMP, 2020).</small></p>	Groundwater Analyte	Units	Action Criteria	<b>Physical Parameters</b>			pH	-	7.0 – 8.0 <sup>1</sup>	Dissolved oxygen	% saturation	80 – 110 <sup>1</sup>	Electrical conductivity	µS/cm	200 – 300 <sup>2</sup>	Redox potential	mV	N/A	Standing water level	metres (Australian height datum)	N/A	<b>Dissolved Metals</b>			Arsenic	mg/L	>0.03 <sup>3</sup>	Cadmium	mg/L	0.0005 – 0.005 <sup>3</sup>	Chromium	mg/L	>0.05 <sup>3</sup>	Copper	mg/L	>0.005 <sup>3</sup>	Lead	mg/L	0.001 – 0.001 <sup>3</sup>	Zinc	mg/L	>0.005 <sup>3</sup>	<b>PFAS Compounds</b>			Perfluorooctane sulphonate (PFOS)	mg/L	>0.00013 <sup>3</sup>	Perfluorooctanoic acid (PFOA)	mg/L	>0.22 <sup>3</sup>	Record	7/09/2023: Interview: - Remondis (RM) advised that " There has been no notification to the authority regarding groundwater Triggers"				
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<b>Air Quality Management Plan (AQMP)</b>																																																													
G249	Air Quality Management Plan (AQMP)	5.3	Management and Monitoring Protocols	<p>- The waste oil unloading and recovery activities occurring within the Hazardous Waste Recycling Facility will consist of <b>activated carbon filter</b> system (FiltCarb FC75 Activated Carbon system) that will manage VOC and odour emissions from the following key points of generations prior to atmospheric release via an elevated stack:</p> <p>a. Truck unloading; b. Passively vented emissions from the tank storage farm; and c. Truck loading.</p> <p>- Packaged Food Recycling Plant will also have activated carbon filter system (FiltCarb FC75 Activated Carbon system)</p> <p>- The life of the carbon filter will be managed based on operating hours and regularly checks via a handheld VOC instrument. The established operating hours and replacement will need to be established based on VOC outlet trends and the outcomes from the validation assessments.</p> <p>- Use of a <b>surfactant-based odour masking agent</b> at Garden Organics Primary Processing Plant and near the depackaging and processing system of Packaged Food Recycling Plant</p> <p>- Use of a <b>water mist</b> at Drill Mud Recycling Facility</p> <p>- Trucks entering and leaving the premises that are carrying loads will be covered.</p> <p>- All processing operations to be conducted undercover within the warehouse buildings</p> <p>- All haul routes are proposed to be paved and cleaned weekly by third party</p>	Record, observation	10/07/2023: Interview: - Remondis (PW) stated that activated carbon filter is present in Building 2. - Remondis (PW) stated that Drill Mud Recycling Facility is not in use yet.																																																							
G250	Air Quality Management Plan (AQMP)	6.1	Procedures for Responding to Odour Complaints	The Shift Supervisor / Operations Manager must investigate the complaint and, if applicable, initiate corrective action. The information is to be recorded in the environmental complaints database, with a response provided within <b>three business days</b> after confirmed receipt of the complaint.	Record	10/07/2023: Interview: - Remondis (RM) confirmed there has been no odour complaints onsite.																																																							

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<b>Emergency Response Management Plan (ERMP)</b>										
G251	Emergency Response Management Plan (ERMP)			- All members of the Emergency Control Organisation (ECO: Chief Warden, Deputy Chief Warden, Communications Officer, Area Wardens and Wardens) must be trained and must be clear on their role in the event of an emergency. - All new employees must be trained in the contents of this Emergency Plan, including location of emergency assembly area, contacts list, incident notification etc., during the induction process. - On an annual basis, all members of the Emergency Control Organisation are to be provided with refresher training in relation to their responsibilities and in dealing with emergency situations. - At least annually, a drill needs to be undertaken at the facility to test and evaluate compliance against this Plan and identify areas where further training is required and/or changes to this Plan is needed. - Within one month following any emergency incident, a review of this plan, training, and control equipment and any other relevant facts shall be conducted to determine the effectiveness of emergency response processes.	Record	10/07/2023: Record sighted: - Chief Fire Warden Training (8 Nov 2022) - Warden training (8 Nov 2022) - Emergency evacuation rehearsal PIRMP attendance sheet (13 March 2023) - Emergency evacuation rehearsal PIRMP test (13 March 2023) - Revised PIRMP dated 28 March 2023  Interview: - Remondis (RM and SH) stated that no emergency incidents have occurred since commencement of operation.				
<b>Long Term Environmental Management Plan (LTEMP)</b>										
G252	Long Term Environmental Management Plan (LTEMP)	9.1	Management Control Procedures	- The integrity of the truck parking hardstand and cover of the concrete bunkers will be assessed on quarterly basis and after periods of significant rainfall.	Record	10/07/2023: Record sighted: - Site HSEQ Inspection (INS34948) in DoneSafe dated 26 Sept 2023 includes the following question: "Is the truck hardstand fit for purpose? Is there any observable holes or cracks that need to be fixed?" The Auditor considers that the integrity of truck parking has been sufficiently included in site inspection checklist.				
G253	Long Term Environmental Management Plan (LTEMP)	9.1.1	Maintenance of Covering Layers	- The truck parking hardstand surface must be maintained to minimise stormwater pooling and allow drainage to the onsite stormwater detention basin. The thickness of truck parking area must be maintained, and any ruts or potholes reinstated with ABBR FCR 4 % Stabilment or similar material.	Observation	10/07/2023: Observation: The truck parking hardstand was observed to be in good condition.				
G254	Long Term Environmental Management Plan (LTEMP)	9.1.2 - 9.1.10	Excavation Works	If lead and zinc contaminated soil contained is exposed, the following process should be followed: 1. Perform Site Induction; 2. Demarcate and secure work area ; 3. Implement PPE and hygiene requirements; 4. Undertake works including excavation, dust control and stockpile management; - Contaminated soil must only be placed in areas of existing contamination or on concrete hardstand. It must not be placed over uncontaminated soil unless a suitable separation layer (eg. heavy duty plastic or geofabric) is in place; - Material types should be segregated to avoid mixing uncontaminated and contaminated soil; - If excavated material is to be reinstated on site, it can only go back to the location and depth from which it came; - Stockpiles should be managed in such a way as to prevent harm to the environment and general public from contaminated soils within the stockpiles; - Access to stockpiles of contaminated material should be limited by keeping stockpiles within site fences; - Stockpiles should be placed on level ground. If this is not possible, stockpiles should not be placed on slopes greater than 5°; - Material should be placed on strong impermeable plastic sheeting to prevent the contamination of underlying soils. Material should not be stockpiled more than 2m high; - The stockpiles should be covered by polythene sheets or tarpaulins to prevent erosion of stockpiled materials. Heavy objects without sharp edges should be placed on the sheets to prevent them from being blown by wind; - Adequate straw bales and/or silt fences should be placed around the perimeter of the stockpile areas to filter runoff from the stockpiles and prevent overland stormwater flow from affecting the base of the stockpile; and - A diversion trench should be excavated, or tightly packed sand bags placed, up-gradient of the stockpile to prevent stormwater from running into the stockpile. 5. Reinstate excavation and marker layer; 6. Locations of the new marker layer should be surveyed, and the LTEMP updated accordingly. 7. Reinstate truck parking hardstand or concrete slab (with ABBR FCR 4% Stabilment or similar material) 8. Classify waste in accordance with the NSW EPA (2014) Waste Classification Guidelines for disposal if necessary and must be disposed of at a suitably licensed landfill facility. 9. If it is necessary to import material to backfill trenches or excavations, imported material must either classify as virgin excavated natural material (VENM), as defined in the NSW EPA (2014) Waste Classification Guidelines (or any update as may occur), satisfy another suitable general or specific EPA exemption, or be landscaping material, conforming with Australian Standard AS4419-2003 Soils for landscaping and garden use (or any update as may occur). Imported material must be classified at the point of origin, and be delivered to site directly from the point of origin. A copy of the validation letter must be reviewed and approved by an appropriately qualified environmental consultant prior to delivery of the material.	Record	10/07/2023: Interview: Remondis (RM) confirmed that lead and zinc soil contained onsite has not been exposed since commencement of operation.				
G255	Long Term Environmental Management Plan (LTEMP)	11.1	Monitoring	Groundwater monitoring results will be reported to the NSW EPA as part of the sites environmental protection licence annual returns and a <b>copy of the annual return will be provided to Council</b>	Record	7/9/2023: Record sighted: - Port Stephens Council email (31 August 2023) Ref No. 356675 acknowledged Remondis details "As part of our submitted plans for our SSD consent, we committed to providing a copy of our EPA Annual Return to the Council. I have attached this as part of this message."				
G256	Long Term Environmental Management Plan (LTEMP)	11.2	Records to be retained	A dedicated logbook, folder or file is required to be maintained by each entity/person responsible for monitoring and reporting, which should include documents relating to contamination management at the site. The documentation would include, but not be limited to: - Induction/training records of subsurface workers on the LTEMP; - Correspondence/communication logs; - Plans and sketches of locations, extent and depth of disturbance; - Licences and approvals; - Photographs of work; - Material tracking and disposal docketts; - Consultant reports; - Soil monitoring results; - Complaints;	Record	10/07/2023: Interview: Remondis (RM) confirmed that no disturbance/excavation works have been conducted in this part of the site.				

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<b>Waste Monitoring Program (WasteMP)</b>																																					
G257	Waste Monitoring Program (WasteMP)	3.4	Staff Training	Staff are adequately trained in recognising and handling prohibited waste streams, including asbestos.	Record	10/07/2023: Record sighted: - Training for prohibited waste and asbestos provided and sighted																															
G258	Waste Monitoring Program (WasteMP)	4	Targets	On an ongoing basis, the Operation Supervisor is to monitor quantity, type, and source of waste received on site, and quantity, type, and quality of outputs produced on site.	Record	10/07/2023: Record sighted: Weighbridge record through Clearweigh for June 2023, which indicated the following waste streams were received and disposed of: cages, ferrous iron or steel, food and garden, glass, mixed hydrocarbon, mixed waste, Nespresso reject, Nespresso cage, non-ferrous metals, oil, paper or cardboard, plastic, plastic film, timber pallets.																															
G259	Waste Monitoring Program (WasteMP)	6	MONITORING ACTIVITIES	<p>Table 4 Summary of waste monitoring activities</p> <table border="1"> <thead> <tr> <th>Monitoring Requirement</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Total waste sent to landfill</td> <td>Cumulative monthly</td> </tr> <tr> <td>Total waste/product removed</td> <td>Monthly</td> </tr> <tr> <td>Waste received annually – landfill</td> <td></td> </tr> <tr> <td>Waste received annually – recycling and recovery</td> <td>Monthly (daily if nearing limit)</td> </tr> <tr> <td>Total waste received – combined</td> <td></td> </tr> <tr> <td>Authorised amount on site – recycling and recovery</td> <td></td> </tr> <tr> <td>Asbestos waste storage/relocation</td> <td>As required</td> </tr> <tr> <td>Reject loads</td> <td>Per load</td> </tr> <tr> <td>Vehicle movements</td> <td>Daily</td> </tr> <tr> <td>Implementation of monitoring plans, systems and procedures</td> <td>Monthly</td> </tr> <tr> <td>Unexpected finds</td> <td>Daily</td> </tr> <tr> <td>Waste classification</td> <td>As required</td> </tr> <tr> <td>Product quality sampling</td> <td>As required</td> </tr> </tbody> </table>	Monitoring Requirement	Frequency	Total waste sent to landfill	Cumulative monthly	Total waste/product removed	Monthly	Waste received annually – landfill		Waste received annually – recycling and recovery	Monthly (daily if nearing limit)	Total waste received – combined		Authorised amount on site – recycling and recovery		Asbestos waste storage/relocation	As required	Reject loads	Per load	Vehicle movements	Daily	Implementation of monitoring plans, systems and procedures	Monthly	Unexpected finds	Daily	Waste classification	As required	Product quality sampling	As required	Record	10/07/2023: Record sighted: Weighbridge record through Clearweigh for June 2023, which indicated the following waste streams were received and disposed of: cages, ferrous iron or steel, food and garden, glass, mixed hydrocarbon, mixed waste, Nespresso reject, Nespresso cage, non-ferrous metals, oil, paper or cardboard, plastic, plastic film, timber pallets. - WCMR : Tomago Resource Recovery Facility and Depot - 21636 - Monthly report sent to EPA. Sighted for February 2023. - Weekly inspection record 11/5/23, 10/3/23. - JME (6 July 2023) Waste classification for North Lambton Edgeworth and Dora Creek Depot Test Order Request (23-041, 043, 045 and 046).  Interview: - Remondis (RM) stated that weighbridge records are conducted for all waste loads entering and exiting the site. Clearweigh records provide vehicle movements. - Product quality sampling has not been provided yet as no product has been sold yet (internal testing has been conducted for R&D purpose only).			
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G260	Waste Monitoring Program (WasteMP)			If an inbound load is deemed to be contaminated with materials not accepted at the facility will be rejected and reloaded back into the same vehicle it arrived in. All rejected loads will be recorded in the computer system with the following information: • Waste type • Source of the waste e.g. vehicle identification, original generator of the load • Recommended alternative waste management facility • Date notifying the EPA	Record	10/07/2023: Interview: Remondis (SH) stated that there have not been any loads rejected yet.																															
<b>Pollution Incident Response Management Plan (PIRMP)</b>																																					
G261	Pollution Incident Response Management Plan (PIRMP)	12	Minimising Harm to Persons on the Premises	The induction program includes environmental aspects such as emergency response and the controls in place to minimise the chance of a pollution incident occurring, how to manage a pollution incident and actions following a pollution incident.  Minimising the impact to persons at REMONDIS during a pollution incident is the highest priority Controls for minimising harm to persons on the premises include: - Risk Assessments - SDS Documentation - Work Procedures/ Instructions - Incident and Hazard Management - Workplace Inspections - Workplace audits - Emergency Management Plan - Integrated Management Plan - Preventative Maintenance - Correct storage and waste management; and - Training & Awareness	Record	10/07/2023: Record sighted: - Site induction program discusses emergency plans - Remondis (RM, SH) stated that the employees have accessed to DoneSafe where all the plans are saved. The paper copy of the plans are also provided in the HSEQ noticeboard. - Workplace inspection sighted.																															
G262	Pollution Incident Response Management Plan (PIRMP)	16	Staff Training	- Nominated Staff will be trained in on site Emergency Management including Fire Fighting, Evacuation Procedures, First Aid and enactment of the PIRMP. - All operators will be provided Spill Management Training incorporating the use of on site and truck spill kits. - Records of employees being trained in the execution of the plan are retained in the site training matrix, training records folder, as well as personnel files.	Record	10/07/2023: - Records of training sighted.																															
G263	Pollution Incident Response Management Plan (PIRMP)	17	Testing & Updating of the PIRMP	It is a legal requirement to test the plan every 12 months and within 1 month of any pollution incident. - The testing of the PIRMP is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and that each plan is capable of being implemented in a workable and effective manner. - Testing will involve undertaking desktop simulations of incidents and if necessary, completing exercises or drills. Testing will cover all the components of the PIRMP, including the effectiveness of the training. - Internal auditing will also be undertaken by verifying data contained in it is accurate and competencies required by personnel are current Audit records are maintained on the BMS. - In the light of that incident, whether the information included in the plan is accurate and up to date, and the plan is still capable of being implemented in a workable and effective manner. - PIRMP Testing will be reported in Donesafe using the PIRMP Testing Form. - Once the testing is completed, it is imperative that the PIRMP is reviewed and changes completed.  17.1 Test Dates, Scenario and Person Responsible  <table border="1"> <thead> <tr> <th>Date Tested</th> <th>Test By</th> <th>Details of Test</th> <th>Findings of Test</th> </tr> </thead> <tbody> <tr> <td>13-03-2023</td> <td>Steven Hassett</td> <td>Hot load entered site with Trackable Waste</td> <td>Need to ensure radios available for two-way communication and conduct updated training with staff</td> </tr> </tbody> </table>	Date Tested	Test By	Details of Test	Findings of Test	13-03-2023	Steven Hassett	Hot load entered site with Trackable Waste	Need to ensure radios available for two-way communication and conduct updated training with staff	Record	10/07/2023: Record sighted: - PIRMP rehearsal record dated 13 March 2023 - Testing recorded in Donesafe.  Interview: - Remondis RM and SH) stated: - Environmental license training is currently being undertaken by all site staff and recorded in DoneSafe. - Corrective actions were identified and incorporated in the PIRMP.																							
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