

Environmental Compliance Audit

Clyde Transfer Terminal

322 Parramatta Road
Clyde NSW 2142

July 2015, Ref. 15009 R01



CAVVANBA
consulting

Cavvanba Consulting Pty Ltd

1/66 Centennial Circuit
PO Box 2191
Byron Bay NSW 2481

ABN: 37 929 679 095

t: (02) 6685 7811
f: (02) 6685 5083
inbox@cavvanba.com

www.cavvanba.com

Report Details**Report:**

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Clyde NSW 2142

Ref: 15009 R01

for

Veolia Environmental Services Australia Pty Ltd

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1 / 66 Centennial Circuit
PO Box 2191
Byron Bay NSW 2481
t (02) 6685 7811
f (02) 6685 5083

A handwritten signature in black ink, appearing to read "Ross Nicolson".

Ross Nicolson
Senior Environmental Scientist

Date: 3 July 2015

A handwritten signature in black ink, appearing to read "Ben Wackett".

Ben Wackett
Principal Environmental Scientist

Date: 3 July 2015

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1.0 Introduction

This environmental compliance audit was conducted by Cavvanba Consulting for the Clyde Transfer Terminal (CTT) located at 322 Parramatta Road, Clyde NSW 2142.

The proposed scope of work was detailed in Cavvanba's proposal to Veolia, on 16 April 2015, and their acceptance of the engagement, dated 22 May 2015. This report should be read in conjunction with Cavvanba's *General limitations to environmental information* in Section 1.4.

1.1 Background

Veolia owns and operates the CTT located at the site. Under the Environment Protection Authority (EPA) 2014 *Waste Classification Guidelines* and Conditions stipulated in the Conditions of Development Consent (CODC) issued by the Minister for Infrastructure and Planning under the Clyde Waste Transfer Terminal (Special Provisions) Act 2003 No 88, the facility is licensed to accept general solid wastes (putrescible and non-putrescible), but only receives general solid waste (putrescible). These wastes are received in an enclosed building and compacted into custom modified shipping containers for transport by rail to Veolia's Woodlawn Bioreactor, located approximately 250 kilometres (km) south-west of Sydney.

In June 2015, Cavvanba conducted the annual environmental compliance audit of the CTT. The audit included a detailed site inspection and site interviews on the 10th June 2015. Site photographs taken during the site inspection can be viewed in Appendix A. Veolia staff escorted Cavvanba during the inspection and provided information on the operations and performance of the facility. Environmental and site staff were aware of the responsibilities associated with the conditions, and were encouraged by site management as well as corporate management to make contributions and improvements to all aspects of the operation. The assistance and co-operation provided by site staff is acknowledged and appreciated. All requested documents were quickly and efficiently obtained, prior to and following the site visit and were current and up to date.

Previous environmental audits applicable to the site are listed below and it should be noted that Cavvanba was only provided with the most recent environmental audit:

- Environ (2005) *Environmental Compliance Audit of the Clyde Transfer Terminal for Collex Pty Ltd*;
- Environ (2006) *Environmental Compliance Audit of the Clyde Transfer Terminal for Collex Pty Ltd*;
- OTEK (2007) *Environmental Audit, Clyde Transfer Terminal* (Ref. 4107050);
- OTEK (2008) *Environmental Audit, Clyde Transfer Terminal* (Ref. 4108048);
- OTEK (2009) *Environmental Audit, Clyde Transfer Terminal* (Ref. 4109054);
- OTEK (2010) *Environmental Audit, Clyde Transfer Terminal* (Ref. 4100034);
- OTEK (2011) *Environmental Audit, Clyde Transfer Terminal* (Ref. 4101126);
- OTEK (2012) *Environmental Audit, Clyde Transfer Terminal* (Ref. 4112056); and
- Cavvanba Consulting (2013) *Environmental Compliance Audit, Clyde Transfer Terminal, 322 Parramatta Road, Clyde, NSW 2142* (Ref. 13027).
- Cavvanba Consulting (2014) *Environmental Compliance Audit, Clyde Transfer Terminal, 322 Parramatta Road, Clyde, NSW 2142* (Ref. 14026).

1.2 Objective

The objective of the environmental audit of the site activities and operations was to assess compliance with the Clyde Transfer (Special Provisions) Act 2003. That Act granted development consent for the CTT, subject to Conditions set out in the document entitled Clyde Transfer Terminal – Conditions of Development Consent, as tabled in the

Legislative Council on 19th November 2003 in the Clyde Transfer Terminal (Special Provisions) Bill 2003.

Condition 60 of the Conditions of Development Consent (CODC) requires annual independent environmental audits of the performance of the development. This audit report will be submitted to the Secretary of the Department of Planning (DoP).

The period of review for this audit is the period 15th January 2014 to 14th January 2015 (the 2014 operational and reporting period).

1.3 Scope of work

The following scope of works was undertaken to achieve the above objective:

- completion of a desktop review before attending the site;
- a detailed site inspection and interviews were carried out by Cavvanba on the 10th June 2015;
- detailed review of relevant documents supplied by Veolia;
- assessment of the level of compliance of the facility with the CODC;
- assessment of the implementation of the Operation Environment Management Plan (OEMP);
- assessment of the effectiveness of sub-plans developed under the OEMP (i.e. Waste, Odour, Noise, Dust, Traffic, Vermin and Pest Control, Stormwater, Contamination and Incident Response Management Plans) as well as the emergency response plan; and
- preparation of an Environmental Compliance Audit Report including a discussion of non-compliances, observations, and recommendations.

1.4 General limitations to environmental information

The findings of this audit are based on the objectives and scope of the services provided. Cavvanba Consulting performed the services in a manner consistent with the normal level of care and expertise exercised by members of the environmental assessment profession. No warranties or guarantees, expressed or implied, are made.

By definition, site auditing involves the review and critique of consultants' and contractors' work, including, amongst others, site histories, site surveys, subsurface investigations, chemical and physical analyses, and risk assessments and modelling. Accordingly, Cavvanba relies on the experience, expertise and integrity of the relevant organisations. The information sources referenced have been used to determine site history and local subsurface conditions. While Cavvanba has used reasonable care to avoid reliance on data and information that is inaccurate or unsuitable, Cavvanba is not able to verify the accuracy or completeness of all information and data made available.

Sampling and chemical analysis of environmental media are based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements and site history, not on sampling and analysis of all media at all locations for all potential contaminants.

Limited environmental sampling and laboratory analyses were undertaken as part of the investigations reviewed by Cavvanba, as described herein. Ground conditions between sampling locations may vary, and this should be considered when extrapolating between sampling points. Except at each sampling point, the nature, extent and concentration of contamination is inferred only. Furthermore, the test methods used to characterise the contamination at each sampling point are subject to limitations and provide only an approximation of the contaminant concentrations. Chemical analytes are based on the

information detailed in the site history. Further chemicals or categories of chemicals may exist at the site, which were not identified in the site history and which may not be expected at the site.

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 site audit are based on the available information at the time of the investigations.

As environmental sampling is based on achieving suitable sampling densities, rather than sampling all media at all locations, and analysis is based on-site histories and likely contaminants of concern, rather than analysis of all media at all locations for all potential contaminants, the absence of any identified hazardous or toxic materials at the site should not be interpreted as a warranty or guarantee that such materials do not exist at the site. Therefore, future work at the site which involves subsurface excavation should be conducted based on appropriate management plans. These should include, *inter alia*, environmental management plans, including unexpected findings protocols, hazardous building materials management plans, and occupational health and safety plans.

2.0 Audit methodology

Condition 60 (below) of the CODC outlines the requirements of the audit:

60. Every year following the date of this consent, or at periods otherwise agreed to by the Secretary, and until such time as agreed to by the Secretary, the Applicant shall arrange for an independent audit of the environmental performance of the development.

The audits shall:

- (a) be conducted pursuant to ISO 14010 Guidelines and General Principles for Environmental Auditing, ISO 14011 Procedures for Environmental Monitoring and any specifications of the Secretary;*
- (b) be conducted by a suitably qualified independent person approved by the Secretary;*
- (c) assess compliance with the requirements of this consent;*
- (d) assess the implementation of the EMP (Construction) and EMP (Operation) and review the effectiveness of the environmental management of the development; and*
- (e) be carried out at the Applicants expense.*

The audits shall be submitted to the Secretary. The Applicant shall comply with all reasonable requirements of the Secretary in respect of any measures arising from or recommended by the audits and within such time as agreed to by the Secretary.

The DoP has requested that annual audits at the CTT should include separate sections addressing in detail the implementation and effectiveness of the OEMP and its individual sub-plans (i.e. Waste, Odour, Noise, Dust, Traffic, Vermin and Pest Control, Stormwater, Contamination and Incident Response Management Plans). To assist in the presentation of information regarding the effectiveness of environmental management activities, the CODC have been grouped into similar categories, and so are not always presented in strict numerical sequence.

Based on the audit process and findings, the levels of compliance with all the relevant Conditions in the CODC have been assessed in Section 3 of this document. Where Conditions relate to a common aspect of the facility or its operation, and an OEMP sub-plan, an assessment has also been provided of the effectiveness with which the sub-plan has been implemented.

In this audit we have not assessed for compliance with the initial Construction Environment Management Plan (CEMP), as construction works had concluded prior to the commencement of this audit period. Conditions relating to construction activities have been identified separately and similarly, for clarity some items specific to the original development, for which there has been no change in status since the previous audit have been included in Appendix B.

Table 2.1 summaries the amendments issued to the CODC, as well as detailing the changes.

Table 2.1: Summary of amendments to the CODC

Amendment	Date Issued	Conditions
MOD-133-11-2006	4 April 2007	Removal of Conditions 84, 85, 86, and 89.
DA-205-08-01-MOD-2	25 September 2008	Alters Condition 112.
DA-205-08-01-MOD-3	1 March 2010	Alters Conditions 2 and 49 and removes Conditions 97, 108, 108A, 109, 110 and 111.
DA-205-08-01-MOD-4	13 May 2014	Alters Condition 1, Condition 8, Condition 10 and removing Condition 9.

The most recent modification (DA-205-08-01-MOD-4), issued within the current audit period permanently increases the permissible waste acceptance rate of the facility to 500,000 tonnes per year.

3.0 **Audit findings**

The audit findings are presented in the tables in the following sub-sections. It is noted that not all of the CODC are relevant to this audit period. Some Conditions applied to the period when the CTT was being constructed, or to a stated time period that concluded prior to this audit period. Conditions that are not relevant to the audit period are presented in Appendix B along with the basis for not auditing the condition, and the compliance status of relevant conditions is discussed in Section 3.

The audit has used the following descriptors to present the audit findings for each Condition of Development Consent:

- Compliant – the CTT is in full compliance with the Condition;
- **Non Compliant** – the CTT is not in compliance with the Condition;
- Not an auditable Condition – for example where the Condition required performance to the satisfaction of the Secretary and there was no evidence available of that satisfaction; and
- Not Applicable – some Conditions only applied in particular circumstances, and those circumstances did not occur during the audit period.

3.1 Conditions relevant to the audit period: general introductory conditions

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>1. (Amended, May 2014). Development shall be carried out in accordance with:</p> <p>(a) DA No. 205-08-01;</p> <p>(b) the EIS prepared for the "Clyde Transfer Terminal" by Maunsell McIntyre Pty Ltd, dated 14 August 2001;</p> <p>(c) the Supplementary EIS prepared for the "Clyde Transfer Terminal" by Maunsell McIntyre Pty Ltd, dated 18 December 2001;</p> <p>(d) all additional information supplied by the Applicant or the Applicant's consultants or subconsultants to the Department or integrated approval bodies pertaining to the development, including:</p> <ul style="list-style-type: none"> - Noise Mitigation Details provided to the EPA by Vipac Engineers & Scientists Ltd by facsimile dated 15 February 2002; - Stormwater Outlet Design, dated 18 February 2002, provided to the Department by Maunsell Australia Pty Ltd; - Information on traffic, odour and noise, dated 9 April 2002, provided to the independent assessor Mr John Court by Maunsell Australia Pty Ltd; - Information on the construction EMP, stormwater drainage, site contamination, landscaping and rehabilitation of Duck River, and the property boundary, dated 10 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd; - Information on odour management, Duck River cycleway, and traffic management, dated 10 April 2002, provided to the independent assessor Mr John Court by Maunsell Australia Pty Ltd; - Information on the property boundary, dated 17 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd; - Information on modifications to pipeline, pipe outlet, scour protection works, detention basin, weighbridge and noise barrier, dated 19 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd; - Information on a proposed community consultative committee and possible community enhancement projects, dated 4 June 2002, provided to the Department by the Applicant; - Information on Parramatta Road plans and odour control procedure, 	<p>The audit process did not identify or give reason to suspect any non-compliance with this condition.</p>	<p>No specific documents</p>	<p>Compliant</p>

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>dated 12 June 2002, provided to the Department by Maunsell Australia Pty Ltd; and</p> <ul style="list-style-type: none"> - Information on odour management, dated 4 July 2002, provided to the Department by the Applicant except as modified by the following Conditions. <p>(e) Modification application MOD-133-11-2006, accompanied by Statement of Environmental Effects Modification to the Terminal Building Forced Ventilation System Clyde Waste Transfer Station, prepared by Environ and dated October 2006, the Odour Mitigation Study Clyde Waste Transfer Terminal Addendum to Final Report, prepared by the Odour Unit and dated July 2006, and Veolia Environmental Services' letter (and attachments) to the Department of Planning dated 15 February 2007.</p> <p>(f) Modification application DA-205-08-01-MOD-2; and</p> <p>(g) Modification application DA-205-08-01-MOD-3 and accompanying letter dated 14 December 2009.</p> <p>(h) Modification application DA-205-08-01-MOD-4 and accompanying Environmental Assessment letter prepared by Veolia Environmental Services (Australia) Pty Ltd and dated 20 January 2014.</p> <p>Except as modified by the following conditions.</p>			
3. It shall be the ultimate responsibility of the Applicant to ensure compliance with these Conditions.	The Applicant (Veolia) was found throughout the audit process to be assuming the responsibility for compliance.	Demonstrated in all documents referenced below.	Compliant
4. These Conditions do not relieve the Applicant of the obligation to obtain all other approvals and licences from all relevant authorities required under any other Act.	The audit process did not identify or give reason to suspect any non-compliance with this condition.	No specific documents.	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
5. The Applicant shall comply or ensure compliance with all the requirements of the Secretary in respect of the implementation of any measures arising from these Conditions.	<p>Veolia was found to provide personnel and financial resources to ensure compliance with environmental requirements. Numerous plans and procedures had been established and implemented. However, as discussed below, the current audit has found compliance is currently not being achieved in some areas, namely:</p> <ul style="list-style-type: none"> • Condition 91; and • Condition 134. <p>These Conditions were the same as the previous audit period.</p>	<p>Veolia Environmental Services, March 2015, <i>Annual Environmental Management Report (AEMR) 2014-2015</i>.</p> <p>ISO 14001 Quality, Safety & The Environment.</p>	Non-Compliant
6. The Applicant must bring to the attention of the Secretary any matter that may require further investigation, or the issuing of instructions from the Secretary, to enable compliance with these Conditions. The Applicant shall comply or ensure compliance with any instruction issued by the Secretary to enable compliance with these Conditions.	Not applicable for the current audit period as no issues were considered to be matters that should be brought to the attention of the Secretary.	Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i> .	Compliant
<p>7. Where the results of any monitoring demonstrate an exceedance of a limit in this Consent, the Applicant shall provide, within 30 days of the monitoring, the monitoring results to the Secretary and Auburn Council stating:</p> <p>(a) The reason for the exceedance;</p> <p>(b) Action taken to ensure the limit is not exceeded in the future;</p> <p>(c) Proposed action to ensure the limit is not exceeded in the future;</p> <p>(d) Timetable for implementing the proposed action in (c); and</p>	Not applicable for the current audit period as all the conducted monitoring did not exceed applicable limits.	Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i> .	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
(i) Results of additional monitoring which has been conducted within 7 days of the action taken in (b) and (c) above, to demonstrate compliance with the limit.			
8. (Amended May 2014). No waste shall be received at the development except waste to be transported by rail from Clyde to the Crisps Creek Intermodal Facility for disposal or treatment at Woodlawn.	No unacceptable loads were reportedly received at the site during the current audit period.	Hippo Station on-line incident reporting. Non-conformances record book – weighbridge area.	Compliant
9. Deleted as per DA-205-08-01-MOD-4 (May 2014).			
10. (Amended May 2014). The applicant shall ensure that no more than 500,000 tonnes per annum of waste is received at the development in any calendar year.	In the audit period, a Notice of Modification was issued in relation to this condition, increasing the tonnage to a permanent 500,000 tonnes per annum. The tonnage accepted at CTT was 498,412.78 tonnes for the 2014 audit period, which does not exceed the current accepted volume.	<i>Notice of Modification, DA-205-08-01-MOD-4</i> , Minister for Planning, 13 May 2014. Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i> .	Compliant
11. The applicant must, in the opinion of the EPA, be a fit and proper person to hold a licence under the Protection of the Environment Operations Act 1997, having regard to the matters in s.83 of that Act.	The audit process did not identify or give reason to suspect any non-compliance with this condition.	Environmental Protection License No. 11763.	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
12. The Applicant is to take all practicable measures to prevent and minimise harm to the environment as a result of the Development.	The audit process did not identify or give reason to suspect any non-compliance with this condition. 'Harm' is assumed to have the meaning defined in the <i>Protection of the Environment Operations Act 1997</i> .	No specific documents.	Compliant
13. If at any time the Secretary is made aware of the occurrence of any impact from the project that poses serious environmental or amenity concerns, and is due to the failure of measures required by these Conditions or those measures identified in the documentation referred to in Condition 1 to ameliorate the impact, the Secretary may request the Applicant to cease the activities causing the impact.	The audit process did not identify or give reason to suspect any such impact from the project that could have been brought to the attention of the Secretary, and no such request was made by the Director General.	No specific documents.	Not Applicable
14. The Applicant may recommence the activities that were ceased, upon written advice by the Secretary that those concerns have been satisfactorily addressed.	Not applicable – see comments for Condition 13.	No specific documents.	Not Applicable
18. The Applicant shall endeavour to resolve any dispute arising out of the implementation of these Conditions.	Discussions with the auditor were held regarding implementation of the community consultative committee, and the issues with the meteorological station following the audit period.	No specific documents.	Compliant
19. For any unresolved dispute arising out of the implementation of these Conditions between the Applicant and a public authority, company or person (but excluding any dispute between the Applicant and its contractors and/or subcontractors engaged in the construction or operation of the development), in the first instance either party can refer the matter to the Secretary for resolution and, if not resolved, to the Minister.	Unresolved disputes exist regarding the implementation of the Conditions, namely Conditions 91 and 134. This is detailed further in Section 4.1 of this report – proposed amendments.	No specific documents.	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
The Minister's determination of the disagreement shall be final and binding on all parties.			
Monitoring Records 20. The results of any monitoring required to be conducted by the Conditions of this Consent or a licence under the Protection of the Environment Operations Act 1997, in relation to the development, must be recorded and retained as specified in this Consent.	The audit inspected monitoring records and found that they satisfy this Condition.	Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i> .	Compliant
21 (<i>Amended, April 2007</i>). All records required to be kept by this Consent or an environment protection 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) provided in a legible form to the Secretary or any authorized officer of the EPA as soon as practicable after a request.	Physical monitoring records are kept on-site for a period of at least four years. In addition, records of monitoring are kept electronically for longer periods of time.	Veolia Environmental Policy. Electronic Files.	Compliant
22. The following records must be kept in respect of any samples required to be collected: (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.	Monitoring required during the audit period consisted of biannual odour and annual truck noise monitoring. All the required information was observed on Veolia records.	Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i> . The Odour Unit (July 2014), <i>Odour Audit XXIII</i> . The Odour Unit (December 2014), <i>Odour Audit XXIV</i> . Veolia Environmental Services, <i>Annual Truck</i>	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
		Noise Measurements, October 2014.	
Environmental Management Plan (EMP) - Operation Stage (OEMP) 39. The Applicant shall prepare an EMP (Operation Stage) which is specific to the development.	The audit reviewed the OEMP, including changes made by revisions and considers that it satisfies this condition.	OEMP dated February 2010 revision I, Rev 1.0	Compliant
40. The EMP (Operation Stage) shall be prepared in accordance with the Conditions of this Consent, all relevant Acts and Regulations and accepted best practice management procedures.	The OEMP is comprehensive and specific and is considered to comply with the requirements of this condition.	OEMP dated February 2010 revision I, Rev 1.0.	Compliant
41. The EMP (Operation Stage) shall include, but is not necessarily limited to, the following plans: (a) Waste Management Plan (b) Odour Management Plan (c) Dust Management Plan (d) Traffic Management Plan (includes monitoring and enforcement of "left turn only") (e) Vermin and Pest Control Plan (includes housekeeping measures) (f) Stormwater Management Plan (g) Site Contamination Management Plan (h) Incident Response Plan (i) Noise Management Plan Amendment – Prior to commencement of operation of the odour control system subject to MOD-133-11-2006, the Applicant shall review the EMP (Operation) in	The audit confirmed that all of the listed sub-plans had been prepared and considered to satisfy this condition.	All individual OEMP sub-plans were reviewed.	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
order to update procedures, measures and monitoring requirements applicable to the modified odour control system. The revision of the EMP shall cover the relevant plans (a) – (i) outlined above, including (but not necessarily limited to) the Odour Management Plan, the Dust Management Plan, and the Noise Management Plan. The revised EMP (Operation) shall be submitted to the EPA and the Secretary. The Secretary's approval of the revised EMP (Operation) shall be obtained prior to commencement of operation of the odour control system.			
42. The Applicant shall address the elements outlined in Attachment 1 of this Consent when preparing the EMP (Operation Stage).	The OEMP was found to address all of the elements required by this condition.	No specific documents.	Compliant
43. The Applicant must not accept any uncontainerised waste at the premises until the EMP (Operation Stage) has been approved by the Secretary.	The OEMP was approved prior to the period under audit.	Veolia/DoP correspondence file.	Compliant
45. All site personnel (including contractors and subcontractors) during the operational stage must be inducted and trained to ensure compliance with the approved EMP (Operation Stage).	The auditors sighted a range of training documents, records and the induction video that demonstrated that appropriate training was being provided to staff, contractors and subcontractors.	Veolia training programs and training records. Site induction video.	Compliant
46. The approved EMP (Operation Stage) shall be made publicly available on request to the Applicant.	The audit confirmed that it is Veolia's policy to provide such information requested by the public. The form in which the OEMP would be provided would be determined by Veolia depending on the specifics of the request.	Veolia Environmental Policy	Compliant

3.2 Waste management plan

Condition Number and details	Compliance comments	Source documents	Audit finding
<p style="text-align: center;">Summary:</p> <p>The audit found that the Waste Management Plan was well implemented and effective in ensuring that only authorised wastes were delivered to the facility. CTT has a small range of clients, consisting of approximately 60% commercial and 40% local councils who are aware of the waste accepted at the facility, limiting unauthorised waste. In addition, CTT implemented a range of initiatives to inform customers and drivers of the wastes that are able to be delivered to the facility. There were no cases of inappropriate waste being received at the site during the 2014 audit period.</p> <p>The audit found the external site conditions to be relatively litter free (with the exception of working areas beneath the compactors). This also demonstrated the effectiveness of the implementation of this sub-plan. Discussions with staff and contractors during the audit confirmed that individuals had a solid appreciation of their individual roles and responsibilities, as outlined in the Waste Management Plan.</p>			
<p>47. The Waste Management Plan must address, but is not necessarily limited to, the following issues:</p> <p>(a) Procedures for inspecting and recording each load of uncontainerised waste received at the terminal and for separating and disposing of any component of the waste that is not permitted to be accepted;</p> <p>(b) Priority waste handling given to the most offensive wastes, otherwise "first in/first out" waste handling;</p> <p>(c) Procedures for cleaning vehicles before they leave the premises in a manner that prevents the tracking of waste from the premises;</p> <p>(d) An education program for all drivers of waste vehicles using the site, about waste types permitted to be received at the premises and the need to ensure their vehicle does not track waste from the premises;</p> <p>(e) The inclusion of conditions in contracts with waste transporters addressing acceptable waste types and punitive measures for non-compliances;</p> <p>(f) An enforcement program to be maintained for the duration of the development which includes the imposition of punitive measures for delivering unacceptable waste types;</p> <p>(g) Procedures for minimising wind blown litter from leaving the premises and for regular patrols of surrounding areas to collect any litter that has been</p>	Each of these specific requirements was found to be adequately addressed in the Waste Management Plan.	<p>Waste Management Plan, February 2010 – Revision I, Rev 1.0.</p> <p>Various CTT procedures.</p>	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>carried from the premises;</p> <p>(h) Procedures for preventing washdown waters and any other liquid that has been in contact with waste from entering the stormwater system;</p> <p>(i) An operational contingency plan to be implemented in the event of equipment failure, industrial action or other situation that prevents the containerisation of waste that has been in the terminal building in excess of 18 hours; and</p> <p>(j) Fire management procedures including the management of fire water in a manner that will not pollute waters.</p>			
62. The Applicant must not cause, permit or allow any waste generated outside the premises to be received at the premises unless permitted to do so by an environment protection licence.	The audit process did not identify any evidence that the applicant had breached this Condition during the 2014 audit period.	Environmental Protection License 11763. Veolia Environmental Services, March 2015, AEMR 2014-2015.	Compliant
63. The Applicant must ensure that waste received at the premises is restricted to inert and solid waste as defined in Schedule 1, Part 3 of the Protection of the Environment Operations Act 1997 or is assessed as inert waste or solid waste following the technical assessment procedure outlined in Technical Appendix 1 of the Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes (EPA, 1999).	No loads, out of 85,550 were inappropriately delivered to the facility during the audit period. More information is provided in the comment for Condition 64.	Site signage, induction video, contract conditions, driver training records, site checks, and inspection records. Non-conforming load register.	Compliant
64. No waste shall be removed from the premises except: (a) construction waste arising from activities during the construction stage of the development;	No loads, out of 85,550 were inappropriately delivered to the facility during the audit period.	Non-conforming load register.	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>(b) waste in sealed shipping containers to be transported by rail for disposal at the Woodlawn Bioreactor;</p> <p>(c) small quantities of waste not permitted by the EPL to be received at the terminal, that have been separated out from the incoming waste stream through a documented operational procedure of regular waste inspections and associated control measures: these wastes are to be disposed of to a lawful waste facility;</p> <p>(d) waste generated from onsite activities such as plant maintenance and repairs, that is not suitable for acceptance at the Woodlawn Bioreactor: these wastes are to be disposed of to a lawful waste facility;</p> <p>(e) wastewater generated onsite: these wastes are to be disposed of to sewer;</p> <p>(f) leachate generated from the onsite management of waste: these wastes are to be disposed of to sewer or a lawful liquid waste treatment plant; and</p> <p>(g) recyclable materials generated from the onsite office: these wastes are to be directed to a suitable recycling facility.</p>			
65. The Applicant shall implement the approved Waste Management Plan to the satisfaction of the Secretary.	Whilst the audit cannot comment regarding the satisfaction held by the Secretary, the concluding remarks address the effectiveness of the implementation of the Waste Management Plan.	No specific documents.	Not an auditable Condition
66. The Applicant will not accept asbestos at the premises. The Waste Management Plan must make provision for identification of asbestos in waste not knowingly received at the premises and for the proper and safe disposal of any asbestos so identified.	The CTT prohibits the receipt of asbestos.	Site signage, contract conditions, driver training – pamphlets and inductions, site checks and inspection records.	Compliant
67. Records shall be made and maintained of each load of waste entering the premises, including the identification of the vehicle, weight, nature and origin of	All required data is created at the weighbridge.	Delivery dockets, site	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
the waste received, and whether the waste was received in pre-packaged shipping containers or for on-site containerisation.		procedure documents, loads register, and site information management system records.	
68. Records shall be made and maintained of any waste leaving the premises by motor vehicle, including the identification of the vehicle, and the weight, classification and destination of the waste.	Inspection of records, and visual observations in the weigh bridge confirmed this to occur.	Waste disposal dockets, loads register, and records.	Compliant
69. Records shall be made and maintained of all events involving the removal of any waste received at the premises which is not permitted to be accepted at the premises.	Records of wastes are recorded in the non-conforming load register, but no loads were delivered which are not permitted to be accepted at the premises.	Non-conforming load register.	Compliant

3.3 Odour management plan

Condition Number and details	Compliance comments	Source documents	Audit finding
<p align="center">Summary:</p> <p>Veolia is compliant with respect to the performance of odour audits during the 2014 audit period. The biannual odour audit frequency required within the current audit period was successfully completed.</p> <p>No odour complaints were recorded within the audit period, which is the same as the previous audit period. This is due to the strategies previously introduced to improve odour management at the site, including increasing the frequency of road sweeping, replacement of old existing transport containers and reviewing the frequency and extent of cleaning of the compactors and weighbridge area. Veolia should be congratulated on the second consecutive audit period with no complaints.</p> <p>During the auditors' visit to the site on 10 June 2015, there were no characteristic garbage smells downwind and no comments related to odour have been made following the multiple site visits by the NSW EPA.</p> <p>The current procedure carried out by Veolia upon receiving odour complaints is to conduct an internal odour investigation consisting of a member of staff conducting an inspection at the boundary of the site as well as throughout the site to try and identify any odours. The complainant will then be contacted by a member of Veolia staff and try to seek further information regarding the odour and let them know of the outcome. This procedure did not have to be implemented during the audit period, due to no complaints being received associated with the site.</p> <p>An issue with the meteorological station meant that data was lost over the period 9 – 17 March 2014. The issue was due to a faulty battery, which was the same as the issue identified in the previous audit period. Corrective actions were detailed by Veolia in the previous AEMR, which were put into place in an attempt to prevent this occurring again.</p>			
<p>48. (<i>Amended, April 2007</i>) The Odour Management Plan must address, but is not necessarily limited to, the following issues:</p> <p>(a) detailed description of the odour control system subject to MOD-133-11-2006, including (but not necessarily limited to) scaled drawings of the system and its location, technical specifications and operational methods;</p> <p>(b) procedures for the management of waste at the premises at all times to minimise the generation of odours;</p> <p>(c) protocols for the operation of the odour control mechanisms for the terminal building, including the forced air extraction system, to minimise the risk of any adverse impact on surrounding commercial and residential areas;</p> <p>(d) procedures for the maintenance and repair of the forced air extraction system on the terminal building;</p>	<p>Six-monthly odour audits were conducted in July 2014 and December 2014 as per requirement of the Condition. All other specific requirements were found to be adequately addressed in the Odour Management Plan.</p>	<p>Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i>.</p> <p>Odour Management Plan, February 2010 – Revision I, Rev 1.0.</p> <p>The Odour Unit, July 2014, <i>Odour Audit</i></p>	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>(e) an emission monitoring program designed to determine compliance with the EPA's odour goal of less than 20U at the nearest sensitive receiver and to establish the efficiency of the forced air extraction system and appropriate equipment maintenance schedules. The program is to include odour emission monitoring using dynamic olfactometry in such a way as to allow determination of the performance of the odour control system;</p> <p>(f) an odour audit program which provides for a comprehensive odour audit of the premises and nearby commercial and residential areas, by an independent, appropriately qualified and experienced person, to be conducted 3-monthly for the initial 24 months of receiving uncontainerised waste at the terminal, 3-monthly for the 12 months following commissioning the odour control system subject to MOD-133-11-2006, and 6-monthly thereafter, unless otherwise approved in writing by the Secretary;</p> <p>(g) an operational contingency plan to be initiated in the event of equipment failure, industrial action or any other situation that prevents the containerisation of any waste that has been in the terminal building in excess of 18 hours. Such a plan shall include suspending the acceptance of further uncontainerised waste at the premises;</p> <p>(h) a testing program designed to determine appropriate maintenance schedules for replacement of odour adsorption material in the pressure relief vents of the waste containers;</p> <p>(i) procedures for the maintenance and repair of the odour adsorption and pressure relief vents of the waste containers, including the replacement of the odour adsorption material; and</p> <p>(j) a community consultation program on odour. The community consultation program may include a community survey, to be developed in conjunction with the community consultative committee.</p>		<p><i>Report XXIII.</i></p> <p>The Odour Unit, December 2014, <i>Odour Audit Report XXIV.</i></p>	
<p>73. The Applicant shall implement the approved <i>Odour Management Plan</i> to the satisfaction of the Secretary.</p>	<p>Whilst the audit cannot comment regarding the satisfaction held by the Secretary, the concluding remarks address the effectiveness of the implementation of the Odour Management Plan.</p>	<p>No specific documents.</p>	<p>Not an auditable Condition</p>

Condition Number and details	Compliance comments	Source documents	Audit finding
74. The Applicant must not cause or permit the emission of offensive odours from the premises, as defined under section 129 of the <i>Protection of the Environment Operations Act 1997</i> .	No odour complaints were received by the CTT during the audit period. No odour complaints have been received since March 2011.	Veolia Environmental Services, March 2015, AEMR 2014-2015. Veolia Environmental Records. L:/NSW/Operations/Plant/Veolia Complaint Register Spreadsheet (dated 25/03/2011) DoP/Veolia Correspondence	Compliant
75. The Applicant is not permitted to use deodorisers for odour control at the premises, unless otherwise approved by the Secretary.	Mains water only is used in the dust suppression system, no deodorisers have reportedly been used.	No specific documents.	Compliant
76. The Applicant shall operate the forced air extraction and odour filtration system whenever waste is contained within the building, unless otherwise approved by the Secretary.	The forced air extraction and odour filtration system is in operation whenever waste is contained within the building.	No specific documents.	Compliant
79. (Amended, April 2007) Following the review of the investigations required under condition 77, or any other odour related investigations and documentation required under this Consent, the Secretary in consultation with the EPA may require the Applicant to carry out additional investigations and implement additional measures to mitigate any identified off-site odour	No requests have been made for additional measures, if such requests were made it would be Veolia's policy to comply with any	No specific documents.	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
impacts.	requests.		
80. All odour monitoring and management plans shall be made available to the public on request to the Applicant.	The audit confirmed that it is Veolia's policy to provide such information requested by the public. The form in which the OEMP would be provided would be determined by Veolia, depending on the specifics of the request.	Veolia Environmental Policy.	Compliant
81. Any containerised waste shall not be exposed to the atmosphere at the site, except via a pressure release mechanism and odour filtration system on a container maintained and operated in accordance with the Conditions of this Consent.	The audit inspected a random sample of containers, and confirmed that this condition is satisfied.	No specific documents.	Compliant
82. The design of the pressure release mechanism and odour filtration system on the waste containers shall be approved by the Secretary prior to the acceptance of any uncontainerised waste at the premises.	The design has not changed during the current audit period.	No specific documents.	Compliant
83. Any waste that has been packed into containers on the site, shall not be re-exposed to the atmosphere at the site, except via a pressure release mechanism and odour filtration system on a container maintained and operated in accordance with the Conditions of this Consent.	Refer to comment for Condition 81.	No specific documents.	Compliant
87. (<i>Amended, April 2007</i>) The applicant shall carry out monitoring of the forced ventilation system subject to MOD-133-11-2006 (including air emissions monitoring or other) as may be required under any Environment Protection License. The monitoring results shall be reported in the Annual Environmental Management report required under condition 59.	<p>The system subject to MOD-133-11-2006 was commissioned on 12 June 2008.</p> <p>In this audit period, two odour audits were carried out (in accordance with the frequencies outlined in Condition 48).</p>	<p>Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i>.</p> <p>The Odour Unit, July 2014, <i>Odour Audit Report XXIII</i>.</p> <p>The Odour Unit, December 2014, <i>Odour</i></p>	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
		<i>Audit Report XXIV.</i>	
<p>88. Monitoring for the concentration of a pollutant emitted to the air must be done in accordance with:</p> <p>(a) any methodology which is required by or under the Protection of the Environment Operations Act 1997 to be used for the testing of the concentration of the pollutant; or</p> <p>(b) if no such requirement is imposed by or under the Protection of the Environment Operations Act 1997, any methodology which the general terms of approval or a condition of the licence (as the case may be) requires to be used for that testing; or</p> <p>(c) if no such requirement is imposed by or under the Protection of the Environment Operations Act 1997 or by the general terms of approval or a condition of the licence (as the case may be), any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</p> <p><i>Note: The Clean Air (Plant and Equipment) Regulation 1997 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</i></p>	<p>Approved methodologies were used.</p> <p>It is noted that the AEMR prepared by Veolia, in Section 3.1 states that Condition 88 was non-compliant, however elsewhere in the document it refers to the meteorological data loss as Condition 91. Cavanba considers the non-conformance to be limited to Condition 91 only, as Condition 88 refers to the methodology rather than the data collected itself.</p>	<p>Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i>.</p> <p>The Odour Unit, July 2014, <i>Odour Audit Report XXIII</i>.</p> <p>The Odour Unit, December 2014, <i>Odour Audit Report XXIV</i>.</p>	Compliant
<p>90. (Amended, April 2007) Prior to the installation of the forced ventilation system subject to MOD-133-11-2006, the Applicant shall provide to the EPA, manufacturer's performance guarantees, demonstrating to the satisfaction of the EPA that the equipment will comply with the design parameters specified in this Consent and/or the Environment Protection License.</p>	<p>The ventilation was observed in operation during the site inspection, and design drawings and correspondence were sighted.</p>	<p>Manufacturer's design drawings.</p>	Compliant
<p>91. A meteorological station must be sited and operated at the premises in accordance with the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW. The Applicant shall undertake the sampling and analysis of the meteorological parameters specified in table below. Sampling and analysis of meteorological parameters shall be carried out strictly in accordance with the methods and references specified in the table.</p>	<p>CTT operated as required by this condition.</p> <p>An issue with the meteorological station meant that data was lost over the period 9 – 17 March 2014. The issue was due to a faulty battery, and was resolved.</p>	<p>Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i>.</p> <p>Hydrometric Consulting</p>	Non-Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
	<p>Corrective actions were put in place previously to prevent/limit the impact of this, as detailed in Section 4.</p> <p>In addition, local weather data from the bureau of meteorology (BOM) was used for this period of downtime.</p> <p>During the audit period, Hydrometric Consulting Services Pty Ltd conducted quarterly services of the weather station.</p>	<p>Services (February 2014) Re – Quarterly service of weather stations.</p> <p>Hydrometric Consulting Services (May 2014) Re – Quarterly service of weather stations.</p> <p>Hydrometric Consulting Services (September 2014) Re – Quarterly service of weather stations.</p> <p>Hydrometric Consulting Services (November 2014) Re – Quarterly service of weather stations.</p> <p>Veolia environmental</p>	

Condition Number and details	Compliance comments		Source documents	Audit finding
			records.	

Parameter	Units of measure	Averaging Period	Method ¹	Frequency
Wind Speed @ 10 m	m/s	1 hour	AM-2 & AM-4	Continuous
Wind Direction @ 10 m	°	1 hour	AM-2 & AM-4	Continuous
Sigma Theta @ 10 m	°	1 hour	AM-2 & AM-4	Continuous
Temperature @ 10 m	K	1 hour	AM-4	Continuous
Temperature @ 2 m	K	1 hour	AM-4	Continuous
Solar Radiation	W/m ²	1 hour	AM-4	Continuous
Rainfall	mm	24 hours	AM-4	Continuous
Evaporation	mm	24 hours	Note ²	Continuous
Additional Requirements		Method ¹		
Siting		AM-1 & AM-4		
Measurement		AM-2 & AM-4		

Note: ¹All methods are specified in the *Approved Methods for the Sampling and Analysis of Air Pollutants in NSW*.

Note: ²Method approved by the EPA in writing.

3.4 Dust management plan

Condition Number and details	Compliance comments	Source documents	Audit finding
<p align="center">Summary:</p> <p>The audit found that the Dust Management Plan was sufficiently implemented and effective to ensure that excessive dust was not generated at the site.</p> <p>Modified Condition 49 states that Depositional Dust (DD) monitoring is only required following the receipt of a dust complaint. Since no dust complaint was received during the 2014 audit period, no DD monitoring was completed. It is noted that significant dust generation is not expected on-site, due to the site being covered in hardstand bitumen and concrete. The absence of dust-related complaints demonstrates that the CTT is effectively managing this aspect of their operations successfully.</p>			
49. (<i>Amended, March 2010</i>) The Dust Management Plan shall include, but not necessarily limited to, control strategies to achieve compliance with any dust emission limits in this Consent and any applicable environment protection license. The Dust Management Plan shall adopt the recommendations made by Turnkey Environmental Services Pty Ltd (dated 13 Feb 2006) and provided in Appendix D of the Statement of Environmental Effects Modification to the Terminal Building Forced Ventilation System Clyde Waste Transfer Station (Environ, Oct 2006) in relation to the dust suppression spray system at the terminal. The Dust Management Plan shall provide for the monitoring of the performance of the dust suppression system and for improving its performance as it may be necessary. Following the receipt of any dust related complaints, the Secretary may require the Applicant to undertake further investigations, monitoring, or implement measures aimed to mitigate identified dust impacts on residential areas associated with the operation of the terminal.	The specific requirements were found to be adequately addressed in the Waste Management Plan.	Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i> . Dust Management Plan, February 2010 – Revision I, Rev 1.0.	Compliant
92. The Applicant shall implement the Dust Management Plan (Construction Stage) and the approved Dust Management Plan (Operation Stage) to the satisfaction of the Secretary.	Whilst the audit cannot comment regarding the satisfaction held by the Secretary, the concluding remarks address the effectiveness of the implementation of the Dust Management Plan (Operation Stage).	No specific documents.	Not an auditable Condition
93. All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	The site audit identified a range of activities being implemented which were considered to be effective in	No specific documents.	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
	minimising the emission of dust from the site.		
94. All trafficable areas and vehicle manoeuvring areas in or on the premises shall be maintained at all times in a condition that will minimise the generation or emission from the premises, of wind-blown or traffic generated dust.	The audit inspection confirmed that this condition is being complied with.	No specific documents.	Compliant
95. Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading (EPA).	The audit inspection confirmed that this condition is being complied with. It is further noted that the majority of deliveries are in fully contained compactor trucks.	No specific documents.	Compliant
96. The Applicant must prepare and implement an Ambient Air Quality Monitoring Plan. The Plan must address, but not necessarily be limited to, the following: (a) Monitoring methodologies and standards (sampling and analysis); (b) Monitoring for concentrations of total suspended particulates (TSP) and dust deposition rates; (c) Locations where monitoring will be carried out; (d) Detailed monitoring cycle and the duration of each monitoring cycle; and (e) Reporting.	The Dust Management Plan addresses the requirements of this condition.	Dust Management Plan, February 2010 – Revision I, Rev 1.0. Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i> . Veolia environmental records.	Compliant
98. Detailed records of operating conditions inside the waste terminal building shall be made coincident with any monitoring for odour or dust required by Conditions of this Consent.	Observations were viewed in consultant reports with respect to conditions inside the waste terminal building during monitoring.	Veolia, <i>NSW Depositional Dust Sample Sheet</i> . The Odour Unit, July 2014,	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
		<i>Odour Audit Report XXIII.</i> The Odour Unit, December 2014, <i>Odour Audit Report XXIV.</i>	

3.5 Traffic management plan

Condition Number and details	Compliance comments	Source documents	Audit finding
<p style="text-align: center;">Summary:</p> <p>The audit found that the Traffic Management Plan was effective in ensuring that all traffic movements were consistent with the Conditions of Development Consent. There were no traffic infringements during the 2014 audit period, which is an improvement from previous audit periods.</p> <p>During the audit it was demonstrated through site practices, management and observed traffic procedures, that the CTT is effectively and actively managing this aspect of their operations in the majority of instances.</p> <p>The improvement in traffic infringements is likely due to the combination of including this information in an updated site induction video, which gives clear instructions on the manoeuvres which are allowed when entering or exiting the site, as well as the production of the "safety requirements – Clyde Transfer Terminal" pamphlet, which also includes this information.</p>			
<p>50. The Traffic Management Plan must address, but is not necessarily limited to, the following issues:</p> <p>(a) An education program for all drivers and owners of waste vehicles using the site, about the "left turn only" restrictions on entering and leaving the premises via Parramatta Road;</p> <p>(b) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the "left turn only" restriction upon entering or leaving the premises via Parramatta Road;</p> <p>(c) An education program for all drivers and owners of waste vehicles using the site, about the waste transport routes permitted to be used in the vicinity of the development;</p> <p>(d) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the permitted transport routes;</p> <p>(e) An enforcement program including the imposition of identified punitive measures against any driver or vehicle owner whenever the above restrictions are breached;</p> <p>(f) Contracts with waste transporters to include conditions addressing entry and exit restrictions and permissible waste transport routes and punitive measures for non-compliances; and</p> <p>(g) Measures to minimise trucks and other heavy vehicles from entering or</p>	Each of these specific requirements was found to be adequately addressed in the Traffic Management Plan.	<p>Traffic Management Plan, Feb 2010 – Revision I, Rev 1.0.</p> <p>Various CTT procedures.</p> <p>Veolia Environmental Services – Safety Requirements – Clyde Transfer Terminal.</p>	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
exiting the premises between the following hours: 10pm and 5am Mondays to Saturdays; 10pm and 7am Sundays and public holidays.			
118. All access to the development shall be via a sealed access road from Parramatta Road. No vehicle shall enter or exit the development via the internal road connecting the Clyde Marshalling Yards to Rawson Street.	<p>The audit could find no reason to suspect that this condition is not being complied with.</p> <p>It is understood that Veolia (outside of the current audit period) is submitting a request for modification to remove this consent condition, as well as 119 and 120.</p>	Audit inspections.	Compliant
119. No vehicle entering the development shall turn right off Parramatta Road.	There were no traffic infringements recorded in the audit period which were a breach of this condition. This is the same as the previous audit period, but a significant improvement historically.	<p>Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i>.</p> <p>Hippo Station incident reports.</p> <p>Veolia Environmental Services – Safety Requirements – Clyde Transfer Terminal Incidents Log.</p>	Compliant
120. No vehicle exiting the development shall turn right onto Parramatta Road.	There were no traffic infringements recorded in the audit period which were a breach of this condition. This is the same as the previous audit period, but a significant improvement	Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i> .	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
	historically.	Hippo Station incident reports. Veolia Environmental Services – Safety Requirements – Clyde Transfer Terminal Incidents Log.	
121. The Traffic Management Plan must be implemented for the duration of the operation of the development, to the satisfaction of the Secretary.	Whilst the audit cannot comment regarding the satisfaction held by the Secretary, the concluding remarks address the effectiveness of the implementation of the Traffic Management Plan.	No specific documents.	Not an auditable Condition
123. The Applicant must ensure no trucks or other heavy vehicles enter or exit the premises between the hours 10pm to 5am Mondays to Saturdays and 10pm to 7am Sundays and public holidays, unless otherwise provided in the Traffic Management Plan approved by the Secretary.	Documentation reviewed in the audit shows that the Traffic Management Plan approved by Director General allows for 24 hour operation of the Terminal.	Traffic Management Plan, Feb 2010 – Revision I, Rev 1.0.	Compliant

3.6 Vermin and pest control plan

Condition Number and details	Compliance comments	Source documents	Audit finding
<p style="text-align: center;">Summary:</p> <p>The audit found that the Vermin and Pest Control Plan was sufficiently implemented and effective to ensure that vermin and pests were properly controlled at the site. There was no observed or reported vermin or pest infestations.</p> <p>As the site operates 24 hours per day, there is no 'end of day' at which to undertake clean-up activities. Rather, the actual rubbish management procedures are considered appropriate, as wastes are removed from the tipping floor well inside 24 hours, and the floor of the shed is cleaned on a daily basis. In addition, general site cleaning is also conducted by a roadsweeper and bobcat on a daily basis, and cleaning using a high pressure washer of the weigh bridge on a quarterly basis, and the compactors on a monthly basis.</p> <p>Quarterly vermin and pest monitoring has also been conducted by a pest controller (Expert Judgement Pest Management Pty Ltd) throughout the reporting period.</p> <p>The audit found the site conditions, facilities and procedures were resulting in a site where observed and reported incidence of vermin pests demonstrates that CTT is effectively managing this aspect of their operations.</p>			
<p>51. The Vermin and Pest Control Plan must address, but is not necessarily limited to, the following issues:</p> <ul style="list-style-type: none"> (a) removing all waste from the tipping areas at the end of each day; (b) cleaning up all waste tipping and handling areas at the end of each day; (c) regular cleaning of catch drains and drainage sumps; (d) minimising onsite waste storage and handling; (e) maintaining any bird deterrent measures such as hanging wires; (f) routine inspection and action for potential vector habitats; (g) using commercial vector control specialists; and (h) conducting routine litter patrols to collect trash on site, around the perimeter, on immediately adjacent properties and on approach roads. 	<p>Each of these specific requirements was found to be adequately addressed in the Vermin and Pest Control Plan, except for the following:</p> <p>Conditions (a) and (b): these requirements are not reflected in the plan, and are not feasible given the 24 hour nature of operations. In practice the intent of these clauses is being satisfied as all waste is removed from the tipping floor well within 24 hours of being tipped, and the tipping and handling areas are cleaned daily.</p>	<p>Vermin and Pest Control Plan, Feb 2010 – Revision I, Rev 1.0</p> <p>Various CTT procedures.</p>	Compliant
115. The design of the terminal building and associated waste handling facilities	Audit inspections and other	No specific	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>shall incorporate such reasonable measures to eliminate or minimise the potential for birds, rodents, flies and other pests to congregate at the development. Consideration shall be given to incorporating the following measures:</p> <p>(a) sealing surfaces to prevent moisture and odour absorption;</p> <p>(b) elimination of crevices where waste, moisture and vermin can accumulate;</p> <p>(c) providing screening of the ventilation openings in the building;</p> <p>(d) eliminating horizontal surfaces where birds can congregate;</p> <p>(e) minimising horizontal ledges where dust and litter can accumulate; and</p> <p>(f) using fencing and netting to prevent wind-blown litter from escaping.</p>	<p>inspection records confirmed that the terminal has been designed and is operated in a manner that has achieved compliance with this condition.</p>	<p>documents.</p>	
<p>116. The Vermin and Pest Management Plan must be implemented for the duration of the operation of the development, to the satisfaction of the Secretary.</p>	<p>Whilst the audit cannot comment regarding the satisfaction held by the Secretary, the concluding remarks address the effectiveness of the implementation of the Vermin and Pest Control Plan.</p>	<p>No specific documents.</p>	<p>Not an auditable Condition</p>
<p>117. The Applicant must take all practicable measures to prevent the attraction and infestation of the premises with vermin and pests.</p>	<p>Audit inspections and review of records confirmed that this condition is being satisfied.</p>	<p>Vermin and Pest Control Plan, February 2010 – Revision I, Rev 1.0.</p> <p>Veolia Environmental files.</p> <p>Expert Judgement Pest Management Pty Ltd, 10 February 2014 <i>Service Report</i>.</p> <p>Expert</p>	<p>Compliant</p>

Condition Number and details	Compliance comments	Source documents	Audit finding
		Judgement Pest Management Pty Ltd, 5 May 2014, <i>Service Report</i> . Expert Judgement Pest Management Pty Ltd, 4 August 2014, <i>Service Report</i> . Expert Judgement Pest Management Pty Ltd, 10 November 2014, <i>Service Report</i> .	

3.7 Stormwater management plan

Condition Number and details	Compliance comments	Source documents	Audit finding
<p style="text-align: center;">Summary:</p> <p>The audit found that the Stormwater Management Plan was sufficiently implemented and effective to ensure that activities at the site do not result in pollution of waters. In the OEMP, monitoring of stormwater is mentioned as only being required following a 1-in-2 year rainfall event, exceeding 34.5 millimetres/hour. No such rain event occurred during this audit period based on the weather station in operation on the site. This requirement is not mentioned in the conditions of consent however.</p> <p>The audit found the site conditions, facilities and procedures were resulting in a site where observed and reported pollution of waters was not occurring.</p>			
52. The Stormwater Management Plan must describe the post construction measures to be employed to operate and maintain the stormwater controls at the premises in a manner that minimises the pollution of waters.	Each of these specific requirements was found to be adequately addressed in the Stormwater Management Plan.	Stormwater Management Plan, Feb 2010 – Revision I, Rev 1.0. Various CTT procedures.	Compliant
99. Except as may be expressly provided by a licence under the Protection of the Environment Operations Act 1997 in relation of the development, section 120 of the Protection of the Environment Operations Act 1997 must be complied with and in connection with the carrying out of the development.	The audit found that waters at the site are properly managed to ensure compliance with this condition.	No specific documents.	Compliant
100. Any water that comes into contact with waste at the premises must be directed to the leachate collection system.	The site has a comprehensive water collection and segregation system.	No specific documents.	Compliant
102. Stormwater pollution controls must be implemented prior to and for the duration of the operation of the development. The controls shall be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared the Scheme shall be consistent with the guidance contained in Managing Urban Stormwater: Council Handbook (available from the EPA). The controls shall incorporate minimum levels of treatment in the following table:	There was no change to the systems during the audit period.	No specific documents.	Compliant

Condition Number and details		Compliance comments	Source documents	Audit finding
	Development component	Minimum level of stormwater treatment		
	Undeveloped sections of access road	Existing overland flow to Duck River		
	Roof water	On-site detention		
	Gatehouse and weighbridge area, carpark, access road and container loading area adjacent to the compaction units	First flush system, GPT, oil and grease separation, on-site detention		

3.8 Site contamination and noise management plans

Condition Number and details	Compliance comments	Source documents	Audit finding
<p style="text-align: center;">Summary:</p> <p>The audit found that the Site Contamination Plan was sufficiently implemented and effective to ensure that activities at the site do not result in site contamination. A minor amendment was highlighted during this audit, which is included in the recommendations section of this report. Previous feedback from the audit was included in other documents which provide the framework of the OEMP, such as the site management plan, and the incident response procedures but not in the OEMP itself.</p> <p>In addition, the audit found the site conditions, facilities and procedures were resulting in a site where observed and reported noise levels were not excessive and below thresholds outlined for Heavy Goods Vehicles.</p>			
53. The Site Contamination Management Plan must include any actions recommended in the environmental report by the site auditor that apply to operation stage activities.	The Site Contamination Management Plan addressed the auditor's recommended actions.	Site Contamination Management Plan, February 2010 Revision I, Rev 1.0	Compliant
<p>54. The Noise Management Plan shall be drafted in consultation with the rail operator for operation of the rail siding adjacent to the waste packaging terminal for the rail haulage services for Collex. The plan is to be submitted to Auburn Council. The plan must address the objective of mitigating operational rail noise from operations directly attributable to the loading and unloading of containers and associated rail operation on the siding adjacent to the Collex terminal, relating to the movement of containers from the Collex packing terminal. The plan must also identify reasonable noise mitigation strategies:</p> <p>a) Upgrade to hardstand areas utilised for loading and unloading of trains and rail track upgrade where feasible;</p> <p>b) Resurfacing of hardstand area with appropriate noise mitigation materials;</p> <p>c) Track repair and realignment where feasible and appropriate to minimise forklift travel having regard for other rail operations and heritage issues;</p> <p>d) Container management protocols to minimise movement and handling of</p>	Each of these specific requirements was found to be adequately addressed in the Noise Management Plan.	Noise Management Plan – Rail Operations Feb 2010 Revision I, Rev 1.0.	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>containers with an emphasis on noise mitigation;</p> <p>e) Identification and utilisation of forklifts to minimise noise impacts and implement measures to minimise use of reversing alarms at night;</p> <p>f) Establishment of a noise complaints procedure;</p> <p>g) Investigating the scheduling of trains outside critical hours subject to metropolitan curfew, Rail Infrastructure Corporation slot management and rail operational considerations;</p> <p>h) Ongoing community consultation; and</p> <p>i) Employee education in noise mitigation practices.</p>			
105. The Applicant shall implement the Noise Management Plan, to the satisfaction of the Secretary.	Whilst the audit cannot comment regarding the satisfaction held by the Secretary, the concluding remarks address the effectiveness of the implementation of the Noise Management Plan.	No source document.	Not an auditable Condition
<p>112. (<i>Amended, September 2008</i>) The Applicant shall implement a Heavy Vehicle Noise Monitoring Management Program for the development to the satisfaction of the Secretary. This program must:</p> <p>a) Monitor heavy vehicle noise on site, in accordance with the methods outlined in the "Truck Noise Monitoring – Proposed Test and Management Plan" prepared by Heggies and dated 26 May 2008;</p> <p>b) Be undertaken quarterly for a year starting in October 2008, and annually thereafter, unless otherwise agreed by the Secretary;</p> <p>c) Measure at least 25% of the heavy vehicles visiting the site;</p> <p>d) Identify heavy vehicles exceeding the relevant noise criteria specified in Australian Design Rule 28/01, or its successor, and ensure that the owners of these subsequently comply with the relevant noise criteria;</p> <p>e) Report the number of non-compliant heavy vehicles identified and the</p>	<p>An annual truck noise monitoring report was conducted during the 2014 audit period as per requirement of this Condition.</p> <p>Eighty-eight truck movements were monitored between 65 to 82 dB (A) which was within or below the thresholds outlined for Heavy Goods Vehicles with a GVM > 12 t on-road use of 81 to 87 dB (A).</p>	<p>Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i>.</p> <p>Veolia Environmental Services, October 2014, <i>Veolia Annual Truck Noise Measurements, Clyde Transfer Terminal</i>.</p>	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
actions undertaken to address these non-compliances in the Annual Environmental Monitoring Report; and f) be amended, should the monitoring activities not achieve the aim of the program to the satisfaction of the Secretary.			
113. The Applicant shall implement an induction program for all drivers of trucks that deliver waste to the waste terminal with the objective of mitigating noise impacts of trucks entering and leaving the waste terminal, including driving procedures and throttle management. The program is to be designed in consultation with Auburn Council and is to emphasise the importance of noise emission control, driving and operating practices and procedures for night time activities.	The audit reviewed the induction program and induction records, and found it to be compliant with this condition.	Induction material. Induction records. Veolia Environmental Services "Safety Requirements – Clyde Transfer Terminal".	Compliant
114. The Applicant shall, in conjunction with the rail operator, implement an induction program for all train drivers and other rail staff dedicated to transporting containers to and from the Collex terminal area by train to the Woodlawn Bioreactor. The program is to emphasise noise mitigation measures through "Good Neighbour" rail techniques such as notch control, idling practices, shunting speeds and engine control and shall form an integral part of the operational noise management plan.	Veolia advised the audit that this requirement is included in their contractual arrangement with the rail operator.	No specific documents.	Compliant

3.9 General Conditions

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>55. The Applicant shall employ or contract a suitably qualified Environmental Management Representative (EMR) throughout the duration of the development. The EMR shall:</p> <p>(a) be the principle person responsible for overseeing environmental management of the development and supervision of environmental services;</p> <p>(b) have the authority to stop work if an adverse impact on the environment has occurred or is likely to occur;</p> <p>(c) be responsible for the certification of all environmental management plans and procedures;</p> <p>(d) be responsible for considering and advising on matters specified in the Conditions of Consent and compliance with such matters;</p> <p>(e) oversee the receipt of, and response to, complaints about the environmental performance of the development;</p> <p>(f) be present on-site during any critical construction or operational activity as defined in the relevant Environmental Management Plan; and</p> <p>(g) be a member of the Community Consultative Committee for the development.</p>	<p>Audit investigations confirmed that there were appropriately appointed and empowered EMRs during the audit period (Toni Soster and Ramona Bachu).</p>	<p>No specific documents.</p>	<p>Compliant</p>
<p>56. The Applicant shall prepare and implement a detailed Environmental Monitoring Program for the proposed development. The program shall include, but is not necessarily limited to, all the monitoring required by this Consent, the environment protection licence, the EMP (Construction Stage) and the EMP (Operation Stage) for the development. The program must:</p> <p>(a) Identify the environmental issues to be monitored;</p> <p>(b) For each issue, indicate whether its monitoring is required by this Consent, the environment protection licence, the EMP (Construction Stage), the EMP (Operation Stage), or by another instrument;</p> <p>(c) Set standards and performance measures for each issue;</p> <p>(d) Describe in detail how each issue is to be monitored, who will conduct the</p>	<p>All the items have been included in the reviewed Environmental Monitoring Program.</p>	<p>Operational Environmental Management Plan, CTT, Revision 1.0, February 2010.</p> <p>Environmental Monitoring Program, CTT, Revision 1.0, February 2010.</p>	<p>Compliant</p>

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>monitoring, how often the monitoring will be conducted, and how the results of the monitoring will be recorded and reported to the Secretary and other relevant authorities; and</p> <p>(e) Indicate the actions taken and procedures to be followed if any non-compliance is detected.</p>			
<p>57. All monitoring required by this Consent must be:</p> <p>(a) conducted by suitably qualified persons approved by the Secretary;</p> <p>(b) conducted in accordance with established standards and protocols; and</p> <p>(c) reported annually in the Annual Environmental Management Report.</p>	The audit found that these Conditions were complied with.	<p>Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i>.</p> <p>Veolia environmental files.</p> <p>Environmental Monitoring Program, CTT, Revision 1.0, February 2010.</p>	Compliant
<p>58. The Applicant shall include a report on the Environmental Monitoring Program in the Annual Environmental Management Report. The report must:</p> <p>(a) summarise the results from the Environmental Monitoring Program over the previous year;</p> <p>(b) analyse the results in relation to both past performance, and the relevant standards and performance measures of the development;</p> <p>(c) identify any emerging trends in the data over the life of the development; and</p> <p>(d) include a copy of the detailed monitoring results as an attachment.</p>	The audit found that these Conditions were complied with.	<p>Veolia Environmental Services, March 2015, <i>AEMR 2014-2015</i>.</p>	Compliant
<p>59. Between twelve and fourteen months after the issue date of an environment protection licence for the development, and annually thereafter for the duration of the development, the Applicant shall submit an Annual Environmental Management Report to the Secretary, the EPA and the</p>	Each of these specific requirements was found to be adequately addressed in the Annual Environmental	<p>Veolia Environmental Services, March 2015, <i>AEMR</i></p>	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>Community Consultative Committee. The report shall be made available to the public on request to the Applicant. The report may be combined with the Annual Return required by the environment protection licence to be submitted to the EPA. The report must:</p> <p>(a) identify all the standards, performance measures, and statutory requirements the development is required to comply with;</p> <p>(b) review the environmental performance of the development to determine whether it is complying with the standards, performance measures, and statutory requirements;</p> <p>(c) identify each occasion during the previous year when the standards, performance measures, or statutory requirements have not been complied with;</p> <p>(d) where any non-compliance is identified, describe the actions or measures taken to ensure compliance, who is responsible for carrying out the actions, and when the actions were (or will be) implemented;</p> <p>(e) include a summary of any complaints made about the development, and indicate the actions taken to address the complaints; and</p> <p>(f) include a report on the Environmental Monitoring Program as specified in this Consent.</p>	<p>Management Report, which is submitted annually to the Secretary.</p>	<p>2014-2015.</p>	
<p>60. Every year following the date of this Consent, or at periods otherwise agreed to by the Secretary, and until such time as agreed to by the Secretary, the Applicant shall arrange for an independent audit of the environmental performance of the development. The audits shall:</p> <p>(a) be conducted pursuant to ISO 14010 – Guidelines and General Principles for Environmental Auditing, ISO 14011 – Procedures for Environmental Monitoring and any specifications of the Secretary;</p> <p>(b) be conducted by a suitably qualified independent person approved by the Secretary;</p> <p>(c) assess compliance with the requirements of this Consent;</p> <p>(d) assess the implementation of the EMP (Construction) and EMP (Operation) and review the effectiveness of the environmental management of the</p>	<p>The independent audit reports have been performed annually, as required.</p> <p>This independent audit has had the particular focus of reviewing the effectiveness of the environmental management of the development.</p>	<p>2005 – 2014 Independent Environmental Audit Reports.</p>	<p>Compliant</p>

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>development; and</p> <p>(e) be carried out at the Applicants' expense.</p> <p>The audits shall be submitted to the Secretary. The Applicant shall comply with all reasonable requirements of the Secretary in respect of any measures arising from or recommended by the audits and within such time as agreed to by the Director- General.</p>			
61. The results of all monitoring and auditing required by this Consent must be made publicly available at the same time they are submitted to the Secretary.	As per comments for Condition 46.	Veolia Environmental Policy.	Compliant
103. The Site Contamination Management Plan must be implemented to the satisfaction of the Secretary, prior to and for the duration of the development.	Whilst the audit cannot comment regarding the satisfaction held by the Secretary, it is noted that the Site Contamination Management Plan was implemented during the duration of the development.	No specific documents	Compliant
<p>125. In relation to activities, which in the event of a disruption to operations may result in significant pollution being emitted, the Applicant must:</p> <p>(a) conduct an assessment to determine the potential internal and external causes of disruption of operations at the premises;</p> <p>(b) determine how these disruptions would impact on operations; and</p> <p>(c) identify the pollution that would result due to the disruption of operations and what impact the pollution would have on the health of the community and the environment.</p>	Veolia has satisfied this condition in their Incident Response Plan.	Incident Response Plan February 2010 Revision I, Rev 1.0.	Compliant
<p>126. In relation to matters identified in the previous condition, the Applicant must prepare an Emergency Management Plan. The Plan shall address, but not necessarily be limited to:</p> <p>(a) identification of threats to the environment and/or public health that could arise in relation to the construction and operation of development. These threats may include fire, overflow, power or other utility failure, natural disaster</p>	<p>The applicant has addressed all the information in their Incident Response Plan and is therefore compliant with this Condition.</p> <p>In addition, an emergency response plan has been prepared</p>	Incident Response Plan February 2010 Revision I, Rev 1.0.	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>etc;</p> <p>(b) identification of strategies to minimise and ameliorate the effects of any water pollution identified from the groundwater and surface water monitoring programs;</p> <p>(c) an estimate of the cost of implementation;</p> <p>(d) actions to effectively respond to the disruption of operations so the risk of pollution is minimised;</p> <p>(e) a communications strategy for alerting relevant agencies and the potentially affected community in the event of the disruption to operations leading to significant pollution; and</p> <p>(f) ensuring that all relevant employees are familiar with the emergency management plan.</p> <p>The Applicant should regularly review the adequacy of the plan obtaining expert advice as required.</p> <p>Note: When developing this emergency plan, consideration should be given to the possible integration with current emergency management plans for the entire site.</p>	<p>for the site, which incorporates this information as well as updated information regarding reporting pollution requirements for the EPA.</p>		
<p>128. The Applicant shall implement the Landscaping Plan in consultation with Auburn Council and to the satisfaction of the Secretary.</p>	<p>Whilst the audit cannot comment regarding the satisfaction held by the Secretary, the standard of landscaping observed during the audit was considered sufficient to satisfy this condition.</p>	<p>N/A</p>	<p>Not an auditable Condition</p>
<p>134. The Applicant shall establish and maintain a Community Consultative Committee for the whole duration of the development, and take all reasonable steps to ensure that the first meeting is held prior to commencement of construction. Selection of representatives shall be agreed by the Secretary and the appointment of an independent Chairperson shall be to the satisfaction of the Secretary in consultation with the Applicant, Parramatta City Council and Auburn Council. The Committee shall include two representatives from the Applicant (including the Environmental Officer), four community representatives</p>	<p>No Community Consultative Committee (CCC) meetings were held during the 2014 audit period as is required by Condition G2.1 of Environmental Protect License 11763.</p> <p>In September 2009, the</p>	<p>Environmental Protection License 11763.</p> <p>Operational Environmental Management Plan, CTT,</p>	<p>Non-Compliant</p>

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>and a representative from each Council. Representatives from relevant government agencies (including Planning NSW) may be invited to attend meetings of the Committee as required. The Committee may make comments and recommendations about the implementation of the development and draft management plans, environmental plans and/or studies. The Applicant shall ensure that the Committee has access to the necessary plans and/or studies for such purposes. The Applicant shall consider the recommendations and comments of the Committee and provide a response to the Committee and the Secretary.</p>	<p>committee unanimously resolved to disband on the basis that the site was now fully operational with few issues arising. This is supported by no complaints being received from external parties during the previous two reporting periods.</p> <p>Veolia has maintained meetings with the Chair of the CCC since 2009, Michael Whelan, including holding meetings to provide updates.</p> <p>However, during the 2014-2015 reporting period with no significant changes to the operations or any ongoing environmental issues or complaints, no meetings were held.</p> <p>It is understood that Veolia (outside of the current audit period) is submitting a request for modification to remove this consent condition, as well as 135 and 136 to better reflect the current circumstances.</p>	<p>Revision 1.0, February 2010</p>	
<p>135. The Applicant shall, at its own expense:</p> <p>(a) provide appropriate facilities for meetings of the Committee;</p> <p>(b) nominate a representative to attend all meetings of the Committee;</p> <p>(c) provide to the Committee regular information on the progress of the work and monitoring results;</p> <p>(d) promptly provide to the Committee such other information as the Chairperson of the Committee may reasonably request concerning the</p>	<p>See comments associated with Condition 134.</p>		<p>Compliant</p>

Condition Number and details	Compliance comments	Source documents	Audit finding
environmental performance of the development; and (e) provide reasonable access for site inspections by the Committee.			
136. The Applicant shall establish a trust fund to be managed by the Chairperson of the Committee to facilitate functioning of the Committee, and pay \$2,000 per annum to the fund for the duration of the development. The payment shall be indexed according to the Consumer Price Index (CPI) at the time of payment. The first payment shall be made by the date of the first Committee meeting. The Applicant shall also contribute reasonable funds for payment of the independent Chairperson, to the satisfaction of the Secretary.	Site interview with Veolia's Environmental Officer Ms. Ramona Bachu and the documents reviewed by the auditor indicate that Veolia has been contributing reasonable funds for payment of the independent Chairperson.	Veolia financial records.	Compliant
137. Prior to the commencement of construction, or as otherwise approved by the Secretary in consultation with Auburn Council, the Applicant shall take all reasonable steps to negotiate an agreed outcome with Auburn Council for an appropriate level of contribution (financial or in-kind) towards mitigating the social and community impacts resulting from the construction and operation of the development. The contribution shall provide, but not necessarily be limited to, the following: (a) the payment of \$50,000 (unless otherwise agreed to by the Secretary) to Auburn Council as a contribution to the drafting of a masterplan for the entire Clyde Marshalling Yards; (b) appropriate monetary lump sum contributions to be negotiated with Auburn Council for the purposes of: - the widening of the Western Overbridge; - establishing a vegetated riparian restoration zone along the eastern bank of Duck River from Parramatta Road to the Clyde railway bridge; - establishing a multi-purpose recreation path adjacent to the riparian zone from Parramatta - Road to the Clyde railway bridge; and - the development and installation of heritage interpretation signage along the multi-purpose recreation path regarding the heritage significance of the Clyde Marshalling Yards and in particular Track 22 and associated pre-	The audits established that all payments required by this Condition were complied with.	Veolia Committee files. Veolia financial records.	Compliant

Condition Number and details	Compliance comments	Source documents	Audit finding
<p>use of the area occupied by the development.</p> <p>(c) ongoing or as otherwise agreed to financial contributions proportional to the tonnage throughput of the terminal for the purpose of local community enhancement projects and/or activities in accordance with a community enhancement plan to be prepared by Auburn Council to reflect community priorities and needs. Should such a negotiated outcome not be reached, the Applicant shall abide by the requirements of the Secretary concerning community enhancement contribution in light of an independent investigation to establish such contribution. Such investigation is to be carried out by an independent person(s) to be appointed by the Secretary in consultation with the Applicant and Auburn Council.</p> <p>The commencement of any construction on-site shall not proceed unless the above outcomes have been agreed or otherwise approved by the Secretary in consultation with Auburn Council.</p>			

3.10 Overall effectiveness of Operation Environmental Management Plan

During the course of the audit, the Operation Environmental Management Plan (OEMP) was reviewed by Cavvanba and is considered complete, containing amendments and additions that were recommended in the previous audit. Additional recommendations identified in this audit period for the OEMP have been included in Section 5 of this report.

4.0 Discussion & conclusions

Cavvanba conducted an environmental compliance audit of the Clyde Transfer Terminal at 322 Parramatta Road, Clyde, NSW for the audit period 15th January 2014 to 14th January 2015. The annual audit identified the level of compliance with the Conditions of Development Consent issued by The Minister for Agriculture and Planning, and considered the effectiveness of the environmental management practices at the site.

In the audit period, the CTT received approximately 498,412.78 tonnes of general solid waste – putrescible.

The Conditions of Development Consent list 137 specific requirements (Conditions) that the CTT must comply with.

- In April 2007, a notice of amendment was issued with 22 new amendments removing, replacing, or altering existing conditions.
- In addition, modification application DA-205-08-01-MOD-2 was issued 25th September 2008 which alters Condition 112.
- Modification application DA-205-08-01-MOD-3 was issued on 1st March 2010 which alters Conditions 2 and 49 and deletes Conditions 97, 108, 108A, 109, 110 and 111.
- Modification application DA-205-08-01-MOD-4 was issued on 13th May 2014 which alters Conditions 1, 8 and 10 and deletes Condition 9.

This resulted in a total of 88 auditable Conditions and 49 not auditable or not applicable Conditions to this audit period.

This audit resulted in the following findings: Of the 88 relevant, auditable Conditions, the CTT was found to be: in compliance with 85 Conditions, and non-compliant with 3 Conditions. The “non-compliant” Conditions were related to:

- Condition 5 – Some “non-compliant” findings in relation to the overall audit;
- Condition 91 – Meteorological information not being collected continuously, due to an issue with the weather station; and
- Condition 134 – No CCC meetings being conducted in the 2014 audit period.

Condition 5 is deemed as being “non-compliant” due to findings in relation to the overall audit including non-compliant items.

Condition 91 relates to a meteorological station being sited and operated at the premises, which are recorded continuously. An issue with the meteorological station meant that data was lost over the period 9 to 17 March 2014. The issue was due to a faulty battery, and was resolved within this timeframe.

It is noted that a similar issue with a faulty battery occurred in the previous audit period, and corrective measures were put in place to prevent this reoccurring, consisting of the following:

- A remote download of the data logger has been established where all data is now stored on the weather station contractors website;
- Remote downloads occur weekly and is monitored by both the weather station contractor and Veolia. This enables Veolia to review the data effectively from offsite locations and promptly resolve any issues; and
- Bureau of Meteorology weather data will be used as a back-up if required.

The downtime for this data was significantly less than during the previous audit period.

Veolia is seen as being "non-compliant" with relation to Condition 134 regarding CCC meetings, as per Condition G2.1 of Environmental Protection License 11763. During the 2014 audit period, no CCC meetings were held.

As per Condition 134, attendance of the Community Consultative Committee meetings in the Condition is specified as consisting of:

Two representatives from the Applicant (including the Environmental Officer), four community representatives and a representative from each Council. Representatives from relevant government agencies (including Planning NSW) may be invited to attend meetings of the Committee as required.

In September 2009, the committee unanimously resolved to disband on the basis that the site was now fully operational with few issues arising. This is supported by no complaints being received from external parties since March 2012. No meetings were held during the 2014-2015 reporting period with no significant changes to the operations or any ongoing environmental issues or complaints.

It is understood that Veolia is currently seeking a modification, and intends to review the current conditions relating the Community Consultation Committee as well as site vehicle movements to better reflect the current circumstances.

The following Environmental Management Plans were found to be effectively implemented, as evaluated by the degree of environmental performance achieved by each plan:

- Dust management Plan;
- Incident response Plan;
- Odour management Plan;
- Site contamination and noise management plans;
- Stormwater management plan;
- Traffic management plan;
- Vermin and pest control plan; and
- Waste management plan.

The same Conditions were found to be "non-compliant" items during the previous audit period (i.e. 2013-2014). The period of downtime of meteorological information was significantly less than the previous audit period, showing an improvement in this regard.

4.1 Proposed amendments

Following consultation with the auditor, it is understood that multiple amendments to the conditions of development consent have been submitted to the Department of Planning and Environment. Cavanba has been provided with a draft copy of the request to modify conditions of development consent. The modifications requested are with respect to vehicle movements at the site, as well as the Community Consultative Committee meetings. It is the view of the auditor that these changes are justified, and suitable for submission.

Vehicle movements

Regarding vehicle movements, Veolia is requesting that Condition 118 is either removed, or modified from "no vehicle" to "no waste delivery vehicle shall enter or exit the development via the internal road connecting the Clyde Marshalling Yards to Rawson Street". It is the understanding of the audit that other industrial operations who share

access to the Marshalling Yards utilise this internal road, which are outside of the control of Veolia.

Also regarding vehicle movements, Veolia are requesting that Condition 119 is removed. This condition is concerned with no vehicles entering the development by turning right, across traffic. The audit notes that the internal road to the development is shared with other businesses, and the right turn slip lane into the property is a legal turning lane, with no signage to the contrary. Veolia believes that they should not be continually enforcing this rule, as there have been no incidents in the 10 years of operations from a traffic management perspective. Monitoring of traffic movements and educating the vehicle drivers through their induction program, both in video and written format is proposed to continue.

Condition 120 however is unable to be removed or modified, as the right turn out of the property onto Parramatta Road is an illegal turn regardless of the conditions.

Community Consultative Committee Meetings

Veolia is also proposing that Conditions 134, 135 and 136 which concern CCC meetings are removed from the CODC. These meetings are not currently being conducted, due to a lack of interest from the local community, as well as Council. No complaints regarding the site have been recorded since March 2011, and it appears there is limited concern from the community and interest from Council and these meetings are not warranted.

Veolia states however that they will keep all the relevant government agencies (including the Department of Planning and Environment, the NSW Environment Protection Authority and Auburn City Council) abreast of any development occurring at the Terminal likely to cause environmental impact.

5.0 Recommendations

The outcome of this audit includes the following recommendations for environmental performance improvement. These recommendations are listed in order of priority:

Condition No.	Recommendations	Timeframe
Condition 66	While there have been no registered cases of asbestos being received at the premises, additional training regarding identification of asbestos should be undertaken by staff members.	For consideration/discussion.
Condition 118 & 119 – Vehicle Movements	Submission of the request for modification of Conditions of Development Consent.	Prior to the end of the next audit period, 14th January 2016.
Condition 134 – Non-compliance with respect to establishing and maintaining CCC meetings.	Submission of the request for modification of Conditions of Development Consent.	Prior to the end of the next audit period, 14th January 2016.
Condition 91 – Meteorological information not being collected continuously, due to an issue with the weather station	<p>New procedures were put into place during the previous audit period, as detailed in Section 4 to attempt to limit non-compliances in this regard. These procedures should be monitored, and their success evaluated.</p> <p>The auditor is of the belief that using BOM data to supplement any data gaps in this information is satisfactory.</p>	Prior to the end of the next audit period, 14th January 2015.
OEMP	<p>It is understood that the OEMP is proposed to be updated, due to a change in company name.</p> <p>The reference to stormwater sampling in the OEMP, which is likely a legacy issue, and not sourced from the CODC should be removed during updating of the document.</p> <p><i>"In accordance with Section 120 of the POEO Act 1997, samples are to be collected from the outlet structure at the on-site retention basin in the occurrence of a wet weather overflow, where stormwater events are greater than or equal to a 1 in 2 year/hr duration storm event (>34.5 mm/hr)"</i></p> <p>For any future disturbance of the</p>	To be incorporated during the proposed document update.

Condition No.	Recommendations	Timeframe
	<p>subsurface, references should be included to take account of the new assessment of site contamination NEPM, which is referred to as:</p> <ul style="list-style-type: none">- <i>National Environment Protection (Assessment of Site Contamination) Measure 1999 (April 2013)</i>, NEPC 2013, Canberra.	

6.0 References

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The Odour Unit (December 2014), *Odour Audit XXIV* (Ref. N1473L).

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Veolia Environmental Services (2014), *Veolia Annual Truck Noise Measurements, Clyde Transfer Terminal*.

Veolia Environmental Services (2010), *NSW Clyde Transfer Terminal, Operational Environmental Management Plan and sub-plans (Waste, Odour, Dust, Traffic, Vermin and Pest, Stormwater, Site Contamination, Incident Response and Noise Management Plans)*, February 2010, Revision I, Rev 1.0.

Appendix A

Photographs



Plate 1: View to the north-west, towards the weighbridge 10/06/15



Plate 2: View to the south-east, showing the shed 10/06/15
Entrance to the shed visible.



Plate 3: View inside shed 10/06/15

View towards the east inside the "shed". Compactors present to left of shot. Rubbish was present inside the shed during the site visit.



Plate 4: View of container loading area 10/06/15

Looking towards the south-east.



Plate 5: Container storage area 10/06/15
View of lifter in the background, looking to the east.



Plate 6: Container storage area and railway line 10/06/15
View of container storage area and railway line, looking to the south-east.



Plate 7: Stormwater catchment area 10/06/15

View of stormwater catchment area, at rear of the site, looking towards the west.



Plate 8: Shed overview 10/06/15

View of site from truck entrance, main office, car park and weighbridge visible in photo.

Appendix B

Conditions not relevant to audit period

Appendix B: Conditions not relevant to audit period

Condition Number and details	Audit finding
<p>2. (<i>Amended, March 2010</i>) In the event of any inconsistency between:</p> <p>(a) the Conditions of this Consent and any document listed from condition 1(a) to 1(g) inclusive, the Conditions of this Consent shall prevail to the extent of the inconsistency; and</p> <p>(b) any document listed from condition 1(a) to 1(g) inclusive, the most recent document shall prevail to the extent of the inconsistency.</p> <p>2A. The Proponent shall comply with any reasonable requirements of the Director-General arising from the Department's assessment of:</p> <p>(a) Any reports, plans, programs, strategies or correspondence that are submitted in accordance with the conditions of this approval; and</p> <p>(b) The implementation of any actions or measures contained in these reports, plans, programs, strategies or correspondence.</p> <p>2B. The Proponent shall prepare revisions of any strategies, plans or programs required under this approval if directed to do so by the Director-General. Such revisions shall be prepared to the satisfaction of, and within a timeframe approved by the Director-General.</p>	Noted
9. Deleted as per DA-205-08-01-MOD-4	
15. The date of commencement shall be the date that the Applicant determines to proceed with the development. The Applicant must provide the date of commencement in writing to the Director-General before commencement of the development.	Not Audited – relevant in prior audit periods
<p>Pre-Construction Compliance Report</p> <p>16. At least two weeks prior to commencement of construction (or within such period as otherwise agreed in writing by the Director-General), the Applicant shall submit to the Director-General a report detailing the level of compliance with each Condition of this Consent that relates to pre-construction activities. The report shall include, but not necessarily be limited to:</p> <p>(a) the identification of each relevant Condition;</p> <p>(b) the details of any study or report required by the relevant Conditions;</p> <p>(c) the level of compliance with each relevant Condition;</p> <p>(d) the reasons for any non-compliance;</p> <p>(e) any action taken or proposed to make good any non-compliance; and</p> <p>(f) any action taken or proposed to implement the recommendations made in any study or report required by the relevant Conditions.</p>	Not Audited – relevant in prior audit periods
<p>Pre-Operation Compliance Report</p> <p>17. At least one month prior to the receipt of uncontainerised waste at the premises (or within such period as otherwise agreed in writing by the Director-General), the Applicant shall submit to the Director-General a report detailing the level of compliance with each Condition of this Consent that relates to pre-operation activities. The report shall include, but not necessarily be limited to:</p> <p>(a) identification of each relevant Condition;</p>	Not Audited – relevant in prior audit periods

Condition Number and details	Audit finding
(b) the details of any study or report required by the relevant Conditions; (c) the level of compliance with each relevant Condition; (d) the reasons for any non-compliance; (e) any action taken or proposed to make good any non-compliance; and (f) any action taken or proposed to implement the recommendations made in any study or report required by the relevant Conditions.	
<p>23. The applicant shall obtain an environmental report prepared by a site auditor accredited under the Contaminated Land Management Act 1997 to determine the nature and extent of contamination at the site and any investigation and/or remediation necessary before the land is suitable for commercial/industrial use.</p> <p>Prior to construction the Applicant shall obtain written endorsement from the site auditor for the following aspects of the Site Contamination Management Plan:</p> <p>(a) A plan to manage the disturbance of contaminated soil in a manner that protects sub-surface waters from contamination</p> <p>(b) A plan to manage dust during the construction and operational stages in a manner that protects the health of on-site and off-site personnel.</p>	Not Audited – relevant in prior audit periods
<p>25. <i>(Amended, April 2007)</i> The Applicant shall prepare an EMP (Construction Stage) which is specific to the development.</p> <p>25A. Prior to commencement of construction of the odour control system subject to MOD-133-11-2006, the Applicant shall prepare and obtain approval from the Director-General for a Construction Environmental Management Plan (CEMP) specific to such works. The CEMP, to be submitted to the Director-General and the DECCW, shall include (but not necessarily be limited to) measures to be undertaken to minimize environmental impacts during construction with particular emphasis on measures for mitigating odour, dust, noise, and traffic impacts on surrounding landuses. The CEMP shall provide details of how the environmental performance of the remediation works will be monitored, what actions will be taken to address identified adverse environmental impacts, and how the relevant requirements of Conditions 26 to 38 shall be addressed. The CEMP shall reflect restrictions to construction hours as follows: Monday to Friday from 7am to 6pm, and Saturdays from 8am to 5pm, with no construction work on Sundays and Public Holidays. The CEMP shall be implemented during construction.</p>	Not Audited – relevant in prior audit periods
<p>24. Prior to completion of construction, any amelioration measures required to enable a site audit statement to be issued shall be implemented.</p> <p>26. The EMP (Construction Stage) shall be prepared in accordance with the Conditions of this Consent, all relevant Acts and Regulations and accepted best practice management procedures.</p> <p>27. The Applicant must not commence any works until the EMP (Construction Stage) has been completed and submitted to the Director-General.</p> <p>28. The Applicant shall certify the EMP (Construction Stage) as being in accordance with the Conditions of Consent prior to submitting it to the Director-General.</p> <p>29. The EMP (Construction Stage) shall be made publicly available.</p>	Not Audited – relevant in prior audit periods
30. The EMP (Construction Stage) shall include, but is not necessarily limited to,	Not Audited

Condition Number and details	Audit finding
<p>the following plans:</p> <p>(a) Soil and Water Management Plan</p> <p>(b) Construction Noise Management Plan</p> <p>(c) Dust Management Plan</p> <p>(d) Construction Waste Management Plan</p> <p>(e) Site Contamination Management Plan</p> <p>(f) Landscaping Plan</p> <p>31. The Applicant shall address the elements outlined in Attachment 1 of this Consent when preparing the EMP (Construction Stage).</p> <p>32. All site personnel (including contractors and subcontractors) during the construction stage must be inducted and trained to ensure compliance with the EMP (Construction Stage).</p>	– relevant in prior audit periods
<p>33. The Soil and Water Management Plan (SWMP) must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities. The SWMP must be prepared in accordance with the requirements for such plans outlined in Managing Urban Stormwater: Soils and Construction (available from the Department of Housing).</p>	Not Audited – relevant in prior audit periods
<p>34. The Construction Noise Management Plan must address, but is not necessarily limited to, the following issues:</p> <p>(a) compliance standards;</p> <p>(b) community consultation;</p> <p>(c) complaints handling monitoring/system;</p> <p>(d) site contact person to follow up complaints;</p> <p>(e) mitigation measures, including details of any noise attenuation measures;</p> <p>(f) the design and operation of the proposed mitigation methods demonstrating best practice;</p> <p>(g) construction times;</p> <p>(h) contingency measures where noise complaints are received; and</p> <p>(i) monitoring methods and programs.</p>	Not Audited – relevant in prior audit periods
<p>35. The Dust Management Plan must include, but not necessarily be limited to, control strategies to achieve compliance with dust emission limits in this Consent and any environment protection licence.</p>	Not Audited – relevant in prior audit periods
<p>36. The Construction Waste Management Plan must include, but not necessarily be limited to, strategies to ensure any waste generated during the construction stage is recycled, reused or disposed of in a lawful manner.</p>	Not Audited – relevant in prior audit periods
<p>37. The Site Contamination Management Plan must include, but not necessarily be</p>	Not Audited – relevant

Condition Number and details	Audit finding
<p>limited to, the following issues that apply to construction stage activities:</p> <p>(a) A plan to manage the disturbance of contaminated soil in a manner that protects sub-surface waters from contamination</p> <p>(b) A plan to manage dust in a manner that protects the health of on-site and off-site personnel.</p>	in prior audit periods
<p>38. The Landscaping Plan must include, but not necessarily be limited to:</p> <p>(a) the recommendations of the Visual Assessment Study in the EIS for landscaping and planting of native species, and</p> <p>(b) commitments by the Applicant for an appropriate financial or in-kind contribution towards landscaping the Parramatta Road frontage to soften and screen the access point as viewed from Parramatta Road.</p>	Not Audited – relevant in prior audit periods
<p>44. The Applicant shall certify the EMP (Operation Stage) as being in accordance with the Conditions of Consent prior to seeking approval of the Director-General.</p>	Not Audited – relevant in prior audit periods
<p>70. <i>(Amended, April 2007)</i> The Applicant shall install a forced ventilation system in the Terminal Building in accordance with MOD-133-11-2006, the design specified in the report Addendum to Final Report-Odour Mitigation Study – Clyde Waste Transfer Terminal – Collex Pty Ltd prepared by the Odour Unit Ltd and dated July 2006, and drawing N3630/100 titled Clyde Transfer Terminal Roof and Gallery Level Proposed Ducting Layour Details prepared by Turnkey Environmental Systems Pty Ltd. The system shall include a single air exhaust stack to discharge all air from the waste receival and compaction/loading building, in accordance with the following specifications (see below):</p> <p>The six original fans drawing air from the building through the odour control system shall be replaced with six fans of at least 18kW capacity (each) as per MOD-133-11-2006. The forced air extraction system installed under MOD-122-11-2006 shall be capable of operating in a proper and efficient manner under continuous duty.</p> <p>Any variations of the design and specifications indicated above resulting from the detailed design of the odour control system shall be approved by the Director-General, in consultation with the DECCW, prior to the commencement of construction. As part of such approval, the Director-General may require the applicant to provide information demonstrating that the final design will not result in increased impacts as those predicted in the documents referred to under condition 1(e).</p>	Not Audited – relevant in prior audit periods
<p>71. <i>(Amended, April 2007)</i> Construction of the Terminal Building forced ventilation system in accordance with MOD-133-11-2006 shall be undertaken under continuous operation of the original forced ventilation system (as per design approved by the Director-General in correspondence to Collex dated 5 January 2003). Forced ventilation in the Terminal Building, by the operation of the original system or the new system subject to MOD-133-11-2006, shall not be interrupted at any time during the period of transferring odour control systems, unless otherwise approved by the Director-General following a written application for temporary stoppage of the ventilation system during that period. Such application shall provide details of stoppage time required, impacts predicted, and proposed mitigation measures and notification requirements. This condition does not apply at times when waste is not contained in the building.</p>	Not Audited – relevant in prior audit periods

Condition Number and details	Audit finding
72. (<i>Amended, April 2007</i>) Prior to commencement of construction of the works required under MOD-133-11-2006, the Applicant shall notify the Director-General, Auburn Council, the DECCW, and the Community Consultative Committee in writing of the date of commencement of construction, details of the main construction activities and anticipated duration of construction and times of the main construction activities.	Not Audited – relevant in prior audit periods
76. (<i>Amended, April 2007</i>) The Applicant shall continuously operate the forced ventilation system subject to MOD-133-11-2006 (and the original forced ventilation system until the system subject to MOD-133-11-2006 becomes operational) whenever waste is contained within the building, unless otherwise approved by the Director-General. As part of such approval, the Director-General may require the Applicant to carry out additional investigations and implement additional measures to mitigate any off-site impacts that may be anticipated or identified from such investigations.	Not Audited – relevant in prior audit periods.
77. (<i>Amended, April 2007</i>) Within three months of the commissioning of the forced ventilation system subject to MOD-133-11-2006, the Applicant shall conduct: (a) odour emission rate sampling and analysis from the single stack (conducted in accordance with the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DECCW January 2007); and (b) odour dispersion modelling for the stack odour discharge conducted in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (DECCW, August 2005) and the Technical Framework – Assessment and Management of Odour from Stationary Sources in NSW (DECCW, November 2006) To confirm whether the operation of the modified stack design meets the DECCW's odour goal of less than 2 OU at the nearest sensitive receiver.	Not Audited – relevant in prior audit periods
78. (<i>Amended, April 2007</i>) The results of any odour performance testing and modelling conducted in accordance with the Conditions of this Consent, including those required under Condition 77, must be submitted to the Community Consultative Committee, the EPA, the Director-General and be made publicly available, within 8 weeks of the testing and modelling having been completed.	Not Audited – relevant in prior audit periods
84. Deleted as per MOD-133-11-2006	
85. Deleted as per MOD-133-11-2006	
86. Deleted as per MOD-133-11-2006	
89. Deleted as per MOD-133-11-2006	

Condition Number and details	Audit finding
97. Deleted as per DA-205-08-01-MOD-3	
101. The approved Soil and Water Management Plan must be implemented prior to and for the duration of the construction stage of the development.	Not Audited – relevant in prior audit periods
104. The Applicant shall implement the approved Construction Noise Management Plan, to the satisfaction of the Director-General.	Not Audited – relevant in prior audit periods
106. <i>(Amended, April 2007)</i> Except as permitted under condition 25A, all construction work at the premises that creates audible noise at residential premises must only be conducted between 7:00am and 5:00pm on Mondays to Fridays and between the hours of 8:00am and 5:00pm on Saturdays. There shall be no construction activities on Sundays or public holidays. The allowable construction times may be varied by an environment protection licence.	Not Applicable - Relevant to the previous audit periods.
107. The delivery of construction materials outside the hours of construction permitted by this Consent is not permitted except when required by police or other authorities for safety reasons; and/or because the operation, personnel or equipment are endangered. In such circumstances, notification is to be provided to the EPA and affected residents at least 24 hours prior to the delivery, or within a reasonable period in the case of an emergency.	Not Applicable - Relevant to the previous audit periods.
108. Deleted as per DA-205-08-01-MOD-3	
108A. Deleted as per DA-205-08-01-MOD-3	
109. Deleted as per DA-205-08-01-MOD-3	
110. Deleted as per DA-205-08-01-MOD-3	
111. Deleted as per DA-205-08-01-MOD-3	
122. Prior to the commencement of construction activities, the Applicant shall demonstrate to the satisfaction of the Director-General, it has reasonable arrangements in place in respect of its use of the right of carriageway, concerning traffic sharing, protection of underground and above-ground services in the vicinity of the carriageway and the potential impacts on the existing weighbridge.	Not Audited – relevant in prior audit periods
124. The Applicant shall fund a traffic study, to be conducted by an independent, suitably qualified person. The study is to be completed and submitted to the Director-General within 14 months from commencement of operations, review the operation of the access road in the first 12 months of the development and recommend any future actions to ensure sufficient future capacity of the access road. The Applicant shall provide a reasonable financial contribution towards any upgrade of the access road recommended by the study.	Not Audited – relevant in prior audit periods

Condition Number and details	Audit finding
127. The Applicant shall consult with the NSW Fire Brigades and install a fire main and hydrants as required by the Fire Brigades. The system shall comply with AS 2419.	Not Audited – relevant in prior audit periods
129. The Applicant shall not construct any new buildings, hardstand, storage areas or vehicle manoeuvring areas within 30 metres of the Duck River Mean High Water Mark (as measured horizontally), to allow for the establishment of a viable riparian zone and multi-purpose recreation path.	Not Audited – relevant in prior audit period
130. The Applicant shall prepare at its own expense a site specific Riparian Zone Management Plan to address the issues contained in Auburn's draft Duck River Riparian Management Plan. The Plan shall be submitted to Auburn Council's Director Service Planning prior to the issue of the Occupation Certificate, or as otherwise agreed to by Auburn Council. Any riparian restoration activities undertaken by the Applicant shall, where appropriate, be consistent with but not necessarily limited to the activities listed in Attachment 3.	Not Audited – relevant in prior audit periods
131. The Applicant shall facilitate as appropriate and as required by the Director-General, the provision of a 3.0 metre wide reinforced concrete multi-purpose recreation path along the landward side of a 30 metre riparian/public open space dedication zone between the proposed development and Duck River, extending from Parramatta Road to the base of the Clyde railway bridge, along the edge of the development.	Not Audited – relevant in prior audit period
132. The Applicant shall facilitate as appropriate and as required by the Director-General and/or contribute to the dedication to Auburn Council of land incorporating the riparian restoration zone and multi-purpose recreation path between the proposed development and Duck River, extending from Parramatta Road to the base of the Clyde railway bridge, along the edge of the development.	Not Audited – relevant in prior audit periods
133. The Applicant shall contribute to the development and installation of heritage interpretation signage in consultation with Auburn Council, regarding the heritage significance of the Clyde Marshalling Yards and in particular Track 22 and associated pre-use of the area occupied by the development. The heritage signage is to be approved by Auburn Council and installed within 6 months of commencement of the approved use or as otherwise agreed to by Auburn Council.	Not Audited – relevant in prior audit periods