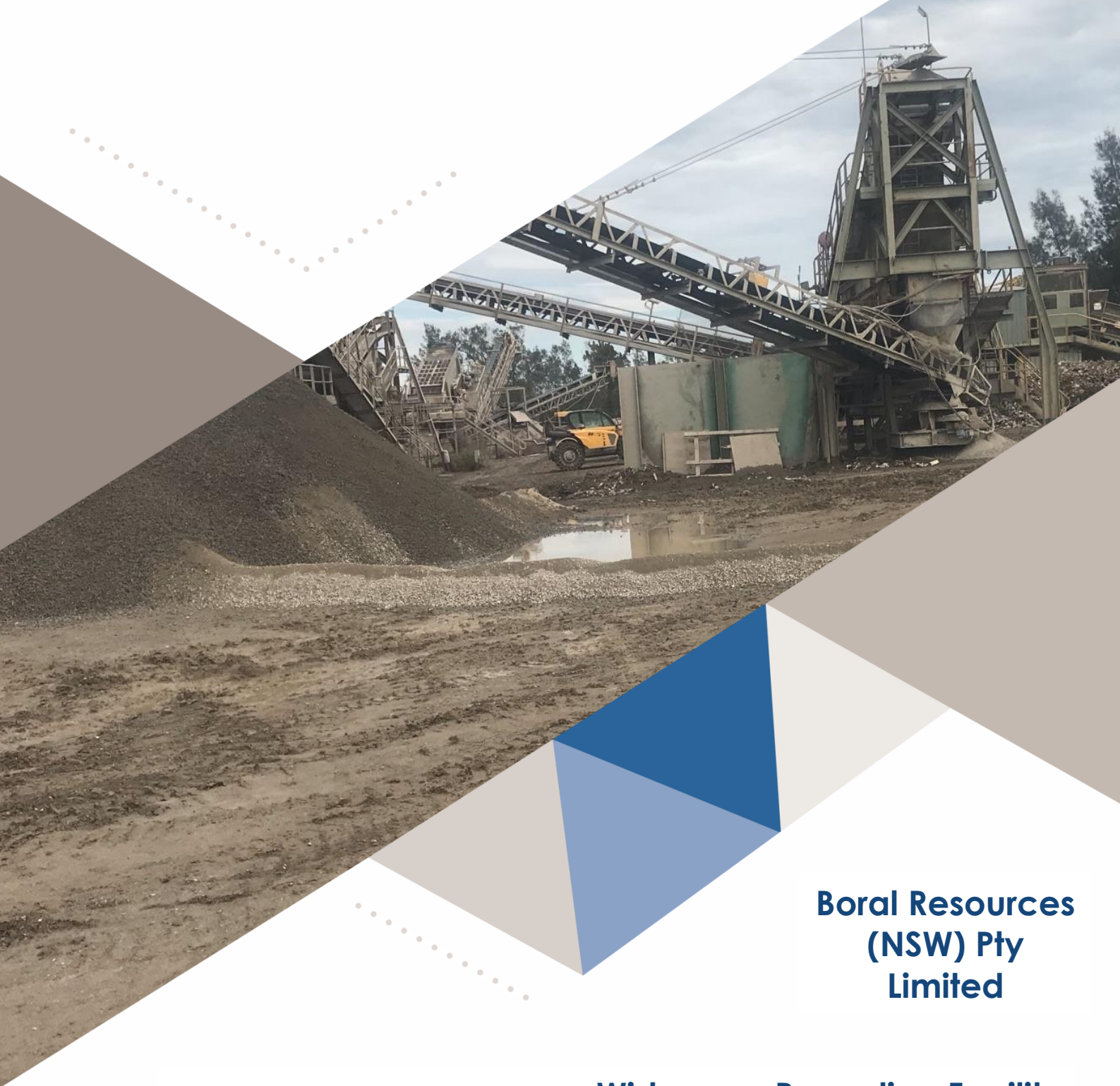




MOLINO STEWART

ENVIRONMENT & NATURAL HAZARDS



**Boral Resources
(NSW) Pty
Limited**

Widemere Recycling Facility
Final Independent Audit Report
Final

Widemere Recycling Facility Final Independent Audit Report

Final

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Document Approval

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1 | Executive Summary

Boral Resources (NSW) Pty Ltd (hereafter referred to as Boral) operates the Widemere Construction and Demolition Recycling Facility (hereafter referred to as Widemere Facility) located at 38 Widemere Road, Wetherill Park NSW 2164 (Lot 4001, DP 1173524), in the Fairfield Local Government Area (LGA). The facility is licensed by the NSW Environment Protection Agency (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act), Environmental Protection Licence (EPL) number 11815 (EPL 11815). Development consent SSD-6525 was granted 25 November 2016 for the facility to receive and process up to 1 million tpa (Mtpa) of non-putrescible construction and demolition waste. The approval was conditional on the adherence of the project to the conditions of consent outlined in the Project Approval.

To meet its post approval conditions, Boral requires an independent and suitable qualified contractor to assemble an audit team and undertake an independent environmental audit of the Widemere Facility. Molino Stewart was engaged by Boral to undertake the Independent Audit Program. This document serves as the Independent Environmental Audit report.

The audit reviewed the project's compliance via systems, documents, records, and procedures in relation to conditions of the development consent associated with the development. The Widemere Facility's annual production is less than 750,000 tonnes, so it is yet to reach the expanded operations trigger.

The audit considered a total of 206 conditions of consent of which there were 320 separately assessable sub-conditions (items). In general, the redevelopment works were found to be compliant with the approval consent requirements. There were 10 non-compliances (items) with two associated corrective actions raised and 11 opportunities for improvement identified.

2 | Introduction

2.1 Background

Boral Resources (NSW) Pty Ltd (hereafter referred to as Boral) operates the Widemere Construction and Demolition Recycling Facility (hereafter referred to as Widemere Facility) located at 38 Widemere Road, Wetherill Park NSW 2164 (Lot 4001, DP 1173524), in the Fairfield Local Government Area (LGA). The facility produces a range of building and construction products by separating, crushing and blending recovered construction and demolition (C&D) wastes with quarry products. The facility is licensed by the *NSW Environment Protection Agency* (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act), Environmental Protection Licence (EPL) number 11815 (EPL 11815).

The site was formerly a quarry between 1924 and 2002. From approximately 1975 to 1997 there was an asphalt plant and associated stockpiling operations at the site. Stockpiling of gravel and other construction materials continued from 1997 to 2002.

In 2002, Development consent (DA 21-1-2002-i) was granted under the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act) by the Minister for Planning. The consent was issued for the construction and operation of the facility, including processing of up to 600,000 tonnes per annum (tpa) of construction and demolition material. The consent was modified in 2005 (MOD-126-8-2005-i) to increase the processing capacity to 750,000 tpa, increase hours of operation and modify processing operations to include a blending plant.

A new application was submitted in 2015 under Part 4.1 of the *EP&A Act* for State significant development (SSD). Development consent SSD-6525 was granted 25 November 2016 for the facility to receive and process up to 1 million tpa (Mtpa) of non-putrescible construction and demolition waste.

Operating since 2002, the site acts as Boral's largest recycling centre in NSW, servicing the building industry's increasing demand for this type of product.

The approval was conditional on the adherence of the project to the conditions of consent outlined in the Project Approval.

2.2 Audit Scope

To meet its post approval conditions, Boral requires an independent and suitable qualified contractor to assemble an audit team and undertake an independent environmental audit of the Widemere Facility. Schedule D (Condition D7) of the approval states that the audit must:

- 10.) *By 30 September 2017, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:*
- D7. Within 1 year of the date of this consent and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:*
- a) Be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary*
 - b) Led by a suitable qualified auditor, and include experts in fields specified by the Secretary;*
 - c) Include consultation with the relevant agencies;*

d) Assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under these approvals);

e) Review the adequacy of any approved strategy, plan or program required under the above-mentioned consents; and

f) Recommend measures or actions to improve the environmental performance of the Development. And/or any strategy, plan or program required under these consents.

Molino Stewart was engaged by Boral to complete the audit for the Widemere Facility in accordance with the post approval requirements. Molino Stewart is to submit a comprehensive report (this report) which outlines the audit methodology, findings, and recommended measures or actions that will improve the environmental performance of the project.

2.2.1 Audit Period

The period covered by this report is the period following the date of the previous Independent Environmental Audit (27th January 2018) to the date of this Independent Environmental Audit site inspection on 17th December 2020 in line with the specific requirements outlined in D7.

2.2.2 Audit Team and Endorsement

The audit was undertaken by Molino Stewart Pty Ltd. Shireen Baguley BE MEngSc, who is an Exemplar Global certified lead environmental auditor (12550). She was assisted by Rebecca O'Rourke BSc Hon who is an environmental scientist at Molino Stewart. The approval documentation issued by DPIE (27 October 2020) is provided in Appendix A.

2.2.3 Independent Audit Post Approval Requirements 2020

The Independent Environmental Audit has been conducted in accordance with DPIE's Independent Audit Post Approval Requirements 2020, as per DPIE's advice of 27 October 2020 (Appendix A).

2.3 Weather

The site inspection was undertaken at the Widemere Construction and Demolition Recycling Facility on the 17th December 2020. The weather was fine with no rainfall.

2.4 Audit Objective

This independent environmental audit is in accordance with Schedule D, Condition D7 and D8 of SSD 6525. The audit serves to assess the environmental performance of the project with reference to the relevant requirements in the conditions of consent.

3 | Terms of Reference

3.1 Audit Methodology

The audit was conducted on the 29th October 2020 to 17th December 2020 to comply with the terms of reference stated above.

The audit was based on:

- examination of a sample of administrative, technical and operating documents and records provided both prior to, during and subsequent to the period the auditors were on site
- site inspection of the facilities and surrounding areas
- interviews and discussions with key personnel.

3.1.1 Audit Criteria

The Widemere Recycling facility was audited against the following criteria:

- SSD 6525, Approved 16 November 2016 and modification one approved 10 October 2017;
- EPL 11815 dated 19 May 2020;
- Additional Water Pollution Management Measures Conditions issued as part of the EPL including:
 - Pollution studies and reduction program (PRP) (commencing 7 November 2016);
- The Environmental Impact Statement (EIS);
- The feedback, requests, and/or comments of relevant agencies consulted; and
- Any other relevant documentation, procedures or plans associated with the project.

3.1.2 Site Inspection

The site inspection was undertaken by Shireen Baguley on 17th December 2020.

3.1.3 Site Interviews

Site interviews were undertaken by Shireen Baguley on 17th December 2020. Those interviewed are listed below:

- Shoanne Labowitch - Environment Manager NSW/ACT, Boral
- Phillip Paterson - Site Manager - Recycling (Widemere), Boral
- Petra Quartullo – Intern, Boral

3.1.4 Consultation

Consultation was undertaken by Shireen Baguley (10th November 2020) as part of the audit scope. This included correspondence with nominated representatives from the following relevant agencies:

- Chris Ritchie (Director Industry Assessments), Department of Planning and Environment
 - Dolores Schembri (Coordinator, Environmental Management), Fairfield City Council.
- Response provided by Ahmad Faizi (Senior Environmental Health Officer)

- Rashad Danoun - Operations Officer, Regulatory Operations Metropolitan West. Environmental Protection Authority (EPA)

The purpose of this consultation was to obtain the relevant agencies input into the scope of the audit and to provide any comments that should be accounted for during the audit. The outcomes of this consultation are included in Appendix F.

3.2 Compliance Status Descriptors

The audit findings were graded in accordance with the following Department of Planning and Environment classifications (June 2018): -

Compliant: The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.

Non-Compliant: The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.

Not Triggered: A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

4 | Audit Findings

4.1 Approval and Document List

Within the Widemere Recycling Facility Approval, the conditions are set out within a series of schedules. The findings have been attached as a series of documents which reflects this layout. In addition to these schedules, there is an EPL, and this has been kept in a separate schedule. Furthermore, the comments received from relevant authority consultation have also been included in a separate schedule.

Thus, the detailed audit findings are presented in the attached schedules (Appendix C).

- Schedule B - Administrative Conditions
- Schedule C – Environmental Performance and Management
- Schedule D – Environmental Management and Reporting
- EPL 11815
- Relevant agency consultation

4.2 Audit Summary

The audit considered a total of 206 conditions or management and mitigation measures comprising a total of 320 separate items. In general, the Widemere Recycling Facility was found to be compliant with the majority of the development consent requirements. There were 10 non-compliances with four associated corrective actions raised and 11 additional opportunities for improvement identified. Eighty-five conditions were classified as not yet triggered; however, on a number of these, Boral has made progress towards meeting the requirements and where identified. opportunities for improvement were noted. There were three such instances.

At the completion of the audit, an exit meeting was held with relevant staff in attendance. The meeting consisted of informal discussions on the non-compliances identified and the corrective actions that had been noted during the audit.

Subsequent to the audit, further information was provided by Boral, and discussions undertaken with Boral and project staff. During this period, if evidence was provided that was able to be sourced subsequent to the audit period, or a corrective action had been undertaken between the site audit and the preparation of this report, we have recorded it as compliant. There were nine such instances including:

- C3: Auditor satisfied with evidence of adherence to the construction period operating hours
- D9: Letter of satisfaction from the DPIE for the Annual Reviews submitted as per the condition sighted. Condition closed out and deemed compliant.
- D10 (a) OEMP review schedule provided as evidence of reviews as per condition requirements
- E1.2 Evidence of submission to EPA (30/06/2017) and Best Practice Dust Management Benchmarking Study prepared by Ramboll Environ (dated 29/06/2017) provided. Auditor satisfied that reporting and submission evidence in line with deadline outlined in condition.
- M1.2: Gravimetric Dust Monitoring at Widemere for April 2020 undertaken by S Krishnamoorthy dated 20.05.2020 sighted subsequent to audit. Auditor satisfied that methodology is in line with condition.

- M1.3 Boral's Dust and Water sample testing records provided which included all requirements of inclusions as per condition
- M3.2: Gravimetric Dust Monitoring at Widemere for April 2020 undertaken by S Krishnamoorthy dated 20.05.2020, NATA accredited lab sighted subsequent to the audit. Test procedure undertaken using AS 3580.10.1 Methods for Sampling and Analysis of Ambient Air Method 10.1 Determination of Particular Matter deposited matter - gravimetric method, these are the EPA approved methods and guidelines for modelling and assessment of air pollutants in NSW, dated November 2016. Auditor satisfied that methodology is in line with condition.
- R1.7: ASIC register provided denoting the credentials of Dominic Millgate and that he is authorised to sign EPA Annual Returns. The auditor is satisfied that the provided evidence addresses the requirements of the condition.
- E2.1: Bank Guarantees and EPA responses provided subsequent to the audit to cover off this condition.

The corrective actions determined through these processes form the basis of the recommended actions list in Table 4. The recommended actions include corrective actions and identified opportunities for improvement.

4.3 Environmental Performance

This audit has found that the environmental performance of the project is good. Boral's management has solid systems in place for the management of the development.

Information and documentation was made readily available during the site interviews. Where issues were noted, the site personnel were receptive to incorporating the points for improvement that were noted.

4.3.1 Physical extent of the development

During the site inspection, the physical extent of the development was reviewed against the approved plans and found to comply with the approved development boundary.

4.3.2 Actual versus predicted impacts

An assessment of actual impacts compared to predicted impacts documented in the environmental impact assessment was undertaken. The results are in Table 1.

Table 1: Comparison of actual impacts compared to predicted impacts

Aspect	Comparison of actual impacts compared to predicted impacts
Traffic and transport	
The traffic and transport impact assessment predicts that the proposal would not have an adverse impact on the local road network. Additional truck traffic movements generated by the proposal would be accommodated with minimal impacts to either the traffic capacity or the road pavement condition on these roads, which are industrial area	Actual impacts in line with predicted impacts

Aspect	Comparison of actual impacts compared to predicted impacts
<p>roads that have been adequately constructed to carry significant volumes of heavy vehicle traffic.</p> <p>The proposal would not have a significant impact on intersection performance.</p> <p>Employee and visitor numbers would change only marginally and no additional car parking capacity would be required.</p>	
Air quality and greenhouse gas	
<p>The air quality assessment predicts that the potential for adverse impacts on the surrounding environment due to the proposal is low.</p>	<p>Actual impacts in line with predicted impacts. No complaints pertaining to dust recorded within reporting period.</p>
<p>The significance of GHG emissions at the facility with regards to NSW and Australian annual GHG emissions is 0.0014% and 0.00042% of annual NSW and Australian GHG emissions for current operations, and 0.0019% and 0.00056% of annual NSW and Australian GHG emissions for proposed operations.</p>	<p>Not assessed in scope of audit</p>
Noise and vibration	
<p>Noise emissions from the facility would satisfy the project specific noise levels at all assessment locations. Potential sleep disturbance impacts from operational maximum noise level events would satisfy the relevant criteria at all assessment locations.</p> <p>Road traffic noise is predicted to comply with relevant goals.</p> <p>Construction road traffic noise impacts were considered to be negligible due to the short construction duration and sourcing of construction materials from the facility. Therefore, no specific noise management or monitoring is proposed.</p>	<p>Actual impacts considered to be in line with predicted impacts. No measurements were taken during the audit, but no noise complaints have been received by the facility.</p>
<p>The proposal would result in a small addition (less than 0.4 ha) of impervious surfaces to the site as a result of the realignment of the southern portion of the perimeter haul road. Water balance modelling was undertaken to predict the impacts to the existing site water management regime as a result of the proposal.</p> <p>The water balance model predicted that the proposal would result in a small increase in the volume and frequency of discharges from the site's licensed discharge point. The discharges are predicted to meet the site's EPL requirement which permits discharge where rainfall exceeds 45 mm over any consecutive five day period. However, the volumetric limit of 100 KL/day is considered to be unachievable for the existing surface water management system as well as the proposal. Potential flooding impacts would be managed through the inclusion of additional flood storage in the perimeter haul road realignment. The facility would maintain existing peak flow discharge rates from the facility during flood events. The southern boundary of the site footprint is elevated above the PMF level for Prospect Creek. The proposal would therefore not reduce storage, obstruct overland flow or worsen downstream flooding in the Prospect Creek floodplain.</p> <p>Impacts to local water resources, water quality and ecology within Prospect Creek are considered to be negligible.</p>	<p>Actual impacts are considered to be in line with predicted impacts, noting that modelling of flood events is beyond the scope of this audit and no sampling or testing of water quality was undertaken. Boral continues to work with the EPA on its Surface Water Characterisation Plan and Surface Waste Monitoring and Mitigation Plan.</p>

Aspect	Comparison of actual impacts compared to predicted impacts
Other matters	
Potential impacts to ecology, heritage, visual, socio economics and hazards and risk were assessed in accordance with the Secretary's environmental assessment requirements for the proposal. Impacts to these matters are considered to be negligible.	Actual impacts in line with predicted impacts

4.3.3 Management plans

A high-level assessment of whether environmental management plans and sub-plans are adequate was undertaken as part of this audit.

The project operates under an operational environmental management plan (OEMP) (prepared by EMM and dated 7 May 2018). This is supported by a package of management plans, including:

- Noise management plan
- Dust management plan
- Surface water mitigation and monitoring plan
- Emergency Response Plan
- Pollution Incident Response Management Plan

There are also monitoring programs incorporated in the OEMP, to monitor waste and groundwater.

It was found the requirements of the CoA and the EPL are incorporated into this framework documentation and the management plans are well integrated into the onsite operations of the Widemere facility.

There were some corrective actions noted during the audit that pertained to the management plans. These are not significant. Details are presented in Section 5 of this report.

4.3.4 Agency Notices

There have been no agency notices.

4.3.5 Non-compliances and Points for Improvement

The audit considered a total of 206 conditions of consent of which there were 320 separately assessable items derived from the conditions of consent.

A total of 10 items or conditions were found to be non-compliant as listed below.

Table 2: Non-compliance summary

Condition Number	Reason for non-compliance
B12 (a)	B12 requires each condition which requires agency consultation to be compliant in order to mark as compliant. In this instance C1 was marked as non-compliant

Condition Number	Reason for non-compliance
	(see detail below) and as such the entire condition was to be marked non-compliant. No further action required.
B12 (b)	B12 requires each condition which requires agency consultation to be compliant in order to mark as compliant. In this instance C1 was marked as non-compliant (see detail below) and as such the entire condition was to be marked non-compliant. No further action required.
B12 (c)	B12 requires each condition which requires agency consultation to be compliant in order to mark as compliant. In this instance C1 was marked as non-compliant (see detail below) and as such the entire condition was to be marked non-compliant. No further action required.
C1 (a)	The Waste Monitoring Plan was not prepared within three months of the consent and correspondence compliance with EPA and DPE was not sighted from within that timeframe. The plan was due 25 March 2017 but this deadline was not met. Boral is still in discussion with the EPA regarding the UFP. No further action required.
C37	Condition requires the sediment basin liner to be monitored every 3 years to ensure a clay finer of permeability of 1×10^{-9} ms ⁻¹ or less and a thickness of no less than 900 mm is maintained. There was an assessment undertaken for the old liner in March 2017. The assessment identified that the basins needed to be upgraded. Finding was that the liner was not performing to the standard required in this liner and there was a need to remediate. Subsequently the basins have been updated and a HDPE liner installed to meet the permeability requirement. However, there have been no subsequent certificates or assessments undertaken which is not in line with the requirements of the condition. Refer to Table 4 for actions arising.
C49	The condition requires an unexpected finds protocol (UFP) to ensure that potentially contaminated material is appropriately managed as approved by the secretary. An unexpected finds protocol was included in Borals' CEMP Southern Perimeter Haul Road Upgrade Version 3 dated 27/10/2017, however, there was no evidence to suggest that there was a response from DPIE nor that the CEMP was approved by secretary. The road was completed in December 2019, therefore approval should have been sought prior to commencement. No further action required.
C50	UFP not in place prior to or during construction works. No further action required.
D1 (b)	<p>Condition required the Applicant to implement a Construction Environmental Management Plan during construction work for the Development. No evidence to suggest that there was a response back to DPIE nor that the CEMP was approved by secretary as per the condition.</p> <p>Completion of road was December 2019 so should have occurred prior to then. No further action required.</p>
D1 (f)	Widemere Southern Perimeter Haul Road Upgrade Construction Environmental Management Plan prepared by Greg Johnson dated 27/10/2017 (v3) sighted.

Condition Number	Reason for non-compliance
	Nothing pertaining to roles and responsibility for all relevant employees involved in construction. No further action required.
M6.1	<p>Incident Report sent to EPA dated 10 August 2020 sighted following an uncontrolled Stormwater Discharge Incident on Monday 27 July 2020 the report stated: "The total volume of discharge cannot be estimated."</p> <p>The condition requires that this should have been monitored during the time in which this condition was triggered and as such this has been deemed non-compliant.</p> <p>However, the EPA currently does not permit discharges and as such the condition is effectively not required. Note that the intent was to be to monitor controlled discharges and as such this needs to be updated if controlled discharges are to continue to be prevented. This should be negotiated with the EPA. Refer to Table 4 for actions arising</p>

The corrective actions determined through these processes form the basis of the recommended actions list in Table 4. The recommended actions include corrective actions and identified opportunities for improvement.

Below is a list of conditions which are compliant or not triggered but have points for improvement raised against them

(a) Consent Conditions

- C31: Requirements relating to the certification of clay liners have effectively been superseded by the construction of new sediment basins onsite. As such, the proponent should liaise with DPIE to arrange suitable resolution to the condition requirements.
- C38: The Groundwater Monitoring Program has not yet been approved. However, it was noted during this audit that consultation with the EPA had not yet occurred. It is recommended that the proponent incorporates consultation undertaken with EPA in the updated Groundwater Monitoring Program.
- C60: It is recommended that the proponent documents quantities to demonstrate how these are maintained below the SEPP 33 requirements.
- D10 (a) OEMP Review schedule (cover letter) as provided by Boral should be included in the OEMP document. It is recommended to be included as a separate table following document control table on page three of OEMP

(b) EPL

- L5.4: The OEMP should be updated to include the use of the sigma-theta method.
- L5.7: The Noise Management Plan should be updated to include reference to NSW Noise Policy for Industry (2017) as per the condition requirement.
- L7.2: The OEMP does not contain any reference to measures in place for the removal of odour generating materials as per the condition. It is recommended that measures relating to condition L7.2 should be addressed in OEMP.
- M1.2: Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (Dated January 2020) contains noise monitoring records. However, there are two dates recorded for the same data (May 2019 (page 19) and April 2019 (page 20)). This should be rectified to a consistent date.

- M1.3: The name of the person undertaking the noise monitoring was not included in the report. However, there is no official requirement to undertake noise monitoring in the EPL and as such this has been recorded as an opportunity for improvement.
- M3.1: The Noise Management Plan should be updated to include reference to NSW Noise Policy for Industry (2017) as per the condition requirement.
- U1.7: The Surface Water Mitigation and Monitoring Plan has not yet been finalised or approved by the EPA. However, a preliminary review undertaken during this audit noted that the method of monitoring as required by condition c(vii) of U1.7 was not included. This should be amended to include all relevant items in the condition when the plan is finalised.

4.3.6 Previous Report Actions

The previous Independent Audit Report undertaken by Element Environmental dated 26th January 2018 identified four non-compliances. A subsequent addendum to the Independent Audit Report dated 3 July 2018 included the EPL conditions which were omitted from the original report and includes two non-compliances. A summary of the non-compliances identified in the two reports the recommended actions and/or follow up actions arising from the non-compliances above were as followed in Table 3.

Table 3: Previous audit non-compliance, action and status summary

Condition Number	Previous audit status	Action	Status
B7	The facility unknowingly accepted asbestos containing material, a portion of which was delivered to a customer.	Subsequently, Boral notified the EPA, organised testing and removal of the material/disposal at a licensed facility. Boral tested the source stockpile at the Facility and disposed of stockpiles containing ACM to EPA's satisfaction. Auditor recommended that Boral analyses the root cause of the situation and, if any processes are identified as requiring improvement, modify the OEMP accordingly.	This was partially addressed in the addendum to the previous audit report. Boral reviewed its inspection and receivals protocol in light of the audit findings and this protocol is reviewed annually. No further incidences have been recorded
C1	The Waste Monitoring Plan was not prepared within three months of the consent and correspondence compliance with EPA and DPE was not sighted from within that timeframe. The current audit report similarly lists Condition C1 as a non-compliance as the Departmental guidelines require this to be done for all subsequent independent environmental audits despite no action to be taken.	The OEMP was under review by DPE and contained a waste monitoring program, which was to be implemented prior to the commencement of the expanded operations. Correspondence with EPA and OEHL was sighted regarding the current OEMP and waste monitoring program.	The waste monitoring program has been completed, however the UFP is still under discussion with the EPA. As per condition C2, the waste monitoring program has not been approved yet and therefore it has not been implemented. However, it is believed this presents a low environmental risk as the inspection and receivals protocol in Appendix A.3 of the existing OEMP is being implemented.
C3	Operations were observed to be occurring outside of approved hours. The weighbridge report for August 2017 was sighted by the auditor. This showed loads being received just before 6am (earliest around 5:50am). Trucks were also admitted onto site prior to	Noted as non-compliance. No complaints recorded by neighbours and no follow-up action required. The auditor advised that the period of conflict between the consent conditions was 5:50am to 6:00am. Therefore, Boral should apply to amend the consent and subsequently the EPL to allow earlier receipt	This condition found to be compliant in this audit.

Condition Number	Previous audit status	Action	Status
	6am to alleviate queuing on the public road, in accordance with Condition C53(a).	of materials. Boral liaise with delivery customers to dispatch trucks from their sites slightly later so that they arrive no earlier than 6am.	
D5	Asbestos containing material (ACM) was unknowingly received onsite and a portion was delivered to a customer.	Subsequently, Boral notified the EPA, organised testing and removal of the material/disposal at a licensed facility. Boral tested the source stockpile at the Facility and disposed of stockpiles containing ACM to EPA's satisfaction. The EPA requested Boral amend the annual return to note a non-compliance with EPL Condition L4.1. Boral notified DPE of the receipt of ACM and revision of the annual return on 13/02/18. Auditor recommended that Boral analyses the root cause of the situation and, if any processes are identified as requiring improvement, modify the OEMP accordingly.	This was partially addressed in the addendum to the previous audit report. Boral reviewed its inspection and receives protocol in light of the audit findings and this protocol is reviewed annually. This condition found to be compliant in this audit.
L4.1	Asbestos containing material (ACM) was unknowingly received onsite and a portion was delivered to a customer	Subsequently, Boral notified the EPA, organised testing and removal of the material/disposal at a licensed facility. Boral tested the source stockpile at the Facility and disposed of stockpiles containing ACM to EPA's satisfaction. Auditor recommended that Boral analyses the root cause of the situation and, if any processes are identified as requiring improvement, modify the OEMP accordingly.	This condition found to be compliant in this audit.

Condition Number	Previous audit status	Action	Status
L6.2	Operations were observed to be occurring outside of approved hours. The weighbridge report for August 2017 was sighted by the auditor. This showed loads being received just before 6am (earliest around 5:50am). Trucks were also admitted onto site prior to 6am to alleviate queuing on the public road.	Noted as non-compliance. No complaints recorded by neighbours and no follow-up action required. The auditor advised that the period of conflict between the consent conditions was 5:50am to 6:00am. Therefore, Boral should apply to amend the consent and subsequently the EPL to allow earlier receipt of materials. Boral liaise with delivery customers to dispatch trucks from their sites slightly later so that they arrive no earlier than 6am	This condition found to be compliant in this audit.

4.3.7 Complaints

There have been no complaints reported in the period covered by this audit.

4.3.8 Incidents

There was one incident which was a non-compliance with the EPL as follows:

(a) 27 July 2020

An incident occurred whereby stormwater discharge occurred after heavy rain. An incident Report to EPA dated 10 August 2020 was sighted pertaining to Widemere Recycling Facility (EPL 11815) – Stormwater Discharge Incident which stated:

"This report has been prepared in response to the event self-reported by Boral Resource (NSW) Pty Ltd (Boral) on Monday 27-Jul-2020 regarding discharge from the Boral Widemere Recycling site located at 38 Widemere Rd WETHERILL PARK NSW 2164 (the Site) during a sustained wet weather event. This report has been prepared in accordance with the EPA request for Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020."

Email response from Rashad Danoun of EPA dated 10 November 2020 was sighted which states:

"The EPA has reviewed the information provided and address all the elements associating with the incident, based on these information (sic) the EPA concluded that no further regulatory actions will be taken in this instance. However (sic) the EPA reminds Boral of their obligation to comply with the conditions under the pollution reduction program of its EPL 11815 until these PRP are considered completed by the EPA and removed from this licence."

There was no non-compliance associated with this incident and no further action was required. EPA and Boral are discussing the Pollution Reduction Program and water management discussions for the site are ongoing.

4.3.9 Agency Consultation

Of the three agencies contacted during the consultation period, two issued responses.

The results of agency consultation and documentation relating to engagement are included in Appendix F.

During consultation with the EPA, it raised the issue of the status of the pollution reduction program (PRP) and its surface water management, which were under review by the EPA at that time. After receiving this advice, during the onsite audit Boral advised that it had received email correspondence from the EPA advising the EPA had completed its review of the documents and progress had been made by Boral with respect to water management and PRP for the site. It was agreed by both parties that discussions relating to the PRP and water management for the site were to be ongoing.

During consultation with Fairfield City Council, it advised following matters were to be included in the assessment scope:

- Assess prospect creek for contaminants
- Compliance with condition of consent and licence
- Air quality
- Noise
- Surface water assessment

- Waste management

Additionally, it noted a screening test under the thresholds in applying SEPP 33 for dangerous goods was conducted. The assessment concluded that 'the facility would not be a hazardous or offensive development provided appropriate setbacks from hazardous materials storage areas are maintained. Assess the setbacks from hazardous materials storage.

The project's compliance with the points above is covered with the CoA and EPL, and were assessed under the following conditions:

- C1 - C2 Waste management,
- C3 - C11 Noise,
- C12 - C21 Air quality, and
- C31 - C37 and C41 - C48 Surface Water,

A Surface Water Characterisation Assessment had been prepared by Royal Haskoning DHV dated 5 April 2017 was reviewed. This document stated: "Potential for impacts to Prospect Creek water quality would increase if Dam 2 water is discharged outside of significant wet weather periods (i.e. via controlled discharges). Controlled discharges are currently not permitted by EPL (Condition U1) and no controlled discharges occurred over the monitoring period."

The screen test was conducted as part of the original impact assessment. The audit reviewed the Statement of Environmental Effects (EMM, 29 May 2015) and Hazardous and Offensive Development Application Guidelines Applying SEPP 33. As per the listed items in EIS and Table 1 in the SEPP 33 Guidelines it was determined that: "If the quantity is below the minimum quantity in Table 1, then it is not potentially hazardous and there is no need to use the graph" As such, the materials onsite are not potentially hazardous and as such there are no setbacks applicable.

Further detail on the consultation is provided in the schedule in Appendix F

5 | Recommendations

5.1 Non-compliance Summary

The audit considered a total of 206 conditions of consent of which there were 320 separately assessable items derived from the conditions of consent. In general, the development was found to be compliant with the approval consent requirements. Ten items within the conditions were found to be non-compliant resulting in four associated corrective actions being raised and there were an additional nine opportunities for improvement identified.

5.2 Corrective Actions and Opportunities for Improvement

There were 10 corrective actions and opportunities for improvement recognised as listed in section 4.3.5 and Table 2 above and in the recommended actions list (Table 4). Table 4 also provides details of Boral's responses to each of the recommended actions and a timeline for action. :

5.3 Limitations

The process by which this audit was conducted, including the sample of records selected and the method for examination used, followed established audit protocols and was in accordance with the best professional judgment of the auditor. It should be understood that the audit consisted of sample observations in a short span of time. Efforts were directed toward sampling all applicable facets of the environmental management systems and associated records, but it is important to recognise that such a sampling method can only support general conclusions and does not necessarily identify all potential problems.

Table 4: Recommended actions list

Actions:		
Refer to the Action Item list attached for details. It is required that Boral reviews the Action List and fills out the columns titled for 'Action to be Taken', 'By whom', and 'By when'. It is the responsibility of the Boral to monitor the progress of the Action List items and ensure close out.		
Number of non-compliances:10 Corrective actions raised: 2 Number of opportunities for improvement: 11	Is Action List Closed off? <input type="checkbox"/> Yes <input type="checkbox"/> No	Signed (When Completed)

Item No.#	Action Item Description	Action taken	By Whom	By When	Date Closed
Corrective Actions against non-compliances					
C37	Condition requires the sediment basin liner to be monitored every 3 years to ensure a clay liner of permeability of 1×10^{-9} ms-1 or less and a thickness of no less than 900 mm is maintained. Subsequently the basins have been updated and HDPE liner installed to meet the permeability requirement. Certification required which satisfies condition.	Boral to engage with DPIE concerning the relevance of the condition given the removal of the clay liner and replacement with HDPE liner. Boral to obtain confirmation that the HDPE liner meets permeability of 1×10^{-9} ms-1 or less.	Site Manager	Within 3 months of the finalization of the audit report. (11 October 2021)	

Item No. #	Action Item Description	Action taken	By Whom	By When	Date Closed
M6.1	Discharge monitoring should have occurred during discharge event. the EPA currently does not permit discharges and as such the condition is effectively not required. Note that the intent was to be to monitor controlled discharges and as such this needs to be updated if controlled discharges are to continue to be prevented. This should be negotiated with the EPA. Boral to correspond with EPA to negotiate the permissibility of discharges following the upgrade of the two basins onsite.	Boral is consulting with the EPA regarding finalization of the Surface Water Monitoring and Mitigation Plan in order to progress the satisfaction of the Pollution Reduction Program (Condition U) currently listed on EPL 11815	Environment Manager	Ongoing (31 December 2021)	
Points for improvement					
C31	Requirements relating to the certification of clay liners have effectively been superseded by the construction of new sediment basins onsite. As such, the proponent should liaise with DPIE to arrange suitable resolution to the condition requirements	Boral to engage with DPIE concerning the relevance of the condition given the removal of the clay liner and replacement with HDPE liner.	Environment Manager	Within 3 months of the finalization of the audit report. (11 October 2021)	

Item No. #	Action Item Description	Action taken	By Whom	By When	Date Closed
C38	The Groundwater Monitoring Program has not yet been approved. However, it was noted during this audit that consultation with the EPA had not yet occurred. It is recommended that the proponent incorporates consultation undertaken with EPA in the updated Groundwater Monitoring Program.	Boral will consult with EPA once the requirement for the GMP is triggered, this will occur within 6 months of the commencement of expanded operations in accordance with Condition C38.	Environment Manager	Within 6 months of the commencement of expanded operations	
C60	It is recommended that the proponent documents quantities to demonstrate how these are maintained below the SEPP 33 requirements.	Boral will undertake a full review of quantities of dangerous goods stored and handled at the site using the ChemAlert program and track thresholds using the program.	Environment Manager	Within 3 months of the finalization of the audit report. (11 October 2021)	
D10 (a)	OEMP Review schedule (cover letter) as provided by Boral should be included in the OEMP document. It is recommended to be included as a separate table following document control table on page three of OEMP. .	Boral has updated to OEMP to include the OEMP review schedule cover letter. Note the OEMP has been reviewed and updated May 2021	Environment Manager	Completed as 05 July 2021	

Item No. #	Action Item Description	Action taken	By Whom	By When	Date Closed
L5.4	The OEMP should be updated to include the use of the sigma-theta method.	The noise management plan included as Appendix B of the updated OEMP (May 2021) has been updated to include reference to the sigma-theta method.	Environment Manager	Completed as 05 July 2021	
L5.7	The Noise Management Plan should be updated to include reference to NSW Noise Policy for Industry (2017) as per the condition requirement.	The noise management plan included as Appendix B of the updated OEMP (May 2021) has been updated to include reference to the NSW Noise Policy for Industry (2017) as per the condition requirement.	Environment Manager	Completed as 05 July 2021	
L7.2	The OEMP does not contain any reference to measures in place for the removal of odour generating materials as per the condition. It is recommended that measures relating to condition L7.2 should be addressed in OEMP.	The OEMP (May 2021) has been updated to include reference to odour management, refer to Section 5.6.1.	Environment Manager	Completed as 05 July 2021	

Item No. #	Action Item Description	Action taken	By Whom	By When	Date Closed
M1.2	Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (Dated January 2020) contains noise monitoring records. However, there are two dates recorded for the same data (May 2019 (page 19) and April 2019 (page 20)). This should be rectified to a consistent date.	The 2019 Annual review document has been updated to reflect the comments and uploaded to the Boral website.	Environment Manager	Completed as 05 July 2021	
M1.3	Point for improvement for future sampling records is that all records include the specific items as per the condition as noise monitoring omitted the name of the person who undertook sample.	Future noise monitoring to include name of person who conducted sampling, Boral to inform relevant consultant prior to work.	Site Manager	Prior to next noise sampling event (upon expanded operations or in response to a complaint)	
M3.1	The Noise Management Plan should be updated to include reference to NSW Noise Policy for Industry (2017) as per the condition requirement.	The noise management plan included as Appendix B of the updated OEMP (May 2021) has been updated to include reference to the NSW Noise Policy for Industry (2017) as per the condition requirement.	Environment Manager	Completed as 05 July 2021	

Item No. #	Action Item Description	Action taken	By Whom	By When	Date Closed
U1.7	The Surface Water Mitigation and Monitoring Plan has not yet been finalised or approved by the EPA. However, a preliminary review undertaken during this audit noted that the method of monitoring as required by condition c(vii) of U1.7 was not included. This should be amended to include all relevant items in the condition when the plan is finalised	SWMMMP is in the process of being updated to reflect recommendation. Updates are occurring in consultation with the EPA.	Environment Manager	Ongoing (31 December 2021)	

6 | Conclusion

Molino Stewart undertook an independent environmental audit of Widemere Facility. This document serves as the Independent Environmental Audit report.

The Widemere Facility was audited against the following criteria:

- SSD 6525, Approved 16 November 2016;
- EPL 11815 dated 19 May 2020;
- Additional Water Pollution Management Measures Conditions issued as part of the EPL including:
 - Pollution studies and reduction program (commencing 7 November 2016);
- The Environmental Impact Statement (EIS);
- The feedback, requests, and/or comments of relevant agencies consulted; and
- Any other relevant documentation, procedures or plans associated with the project.

Consultation was undertaken by Shireen Baguley (10th November 2020) as part of the audit scope and in line with the conditions.

The audit reviewed the Widemere Facility's compliance via systems, documents, records, and procedures in relation to conditions of associated with the facility's operation.

The audit considered a total of 206 conditions of consent of which there were 320 separately assessable sub-conditions. In general, the redevelopment works were found to be compliant with the conditions of consent requirements. 10 conditions or items were found to be non-compliant. The full details of the audit findings are provided in the schedules in Appendix A.

There were four recommended actions for the 10 non-compliant items, and 11 opportunities for improvement.

Appendix A | Planning Secretary Audit Team Agreement



Boral Resources (NSW) Pty Ltd
Level 18, 15 Blue Street North
Sydney NSW 2060

27 October 2020

Attention: Shoanne Labowitch

Email Only:

Shoanne.Labowith@boral.com.au

Dear Ms Labowitch

**Agreement of Independent Auditor
Widemere Recycling Facility - SSD 6525**

I refer to your letter dated 22 October 2020 seeking the agreement of the Secretary of the Department of Planning, Industry and Environment (**Department**) of a suitably qualified, experienced and independent auditor to undertake an independent audit of the Widemere Recycling Facility.

In accordance with Condition D7 of SSD 6525 the Secretary has agreed to the following audit team from Molino Stewart:

1. Shireen Baguley, lead auditor
2. Steven Molino, alternate lead auditor
3. Rebecca O'Rourke, assistant auditor
4. Jenni Kremer, alternate assistant auditor

Please ensure this correspondence is appended to the Independent Audit Report.

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

The Department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding, the agreement for the above listed audit team for this project, each respective project approval requires a request for the agreement to the auditor be submitted to the Department, for the consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor will be considered.

If you have any questions, please contact Maria Divis on (02) 8275 1156 or compliance@planning.nsw.gov.au.

Yours sincerely

Julia Pope
Team Leader Compliance Metro

as nominee for the Planning Secretary

Appendix B | Plan of Facility

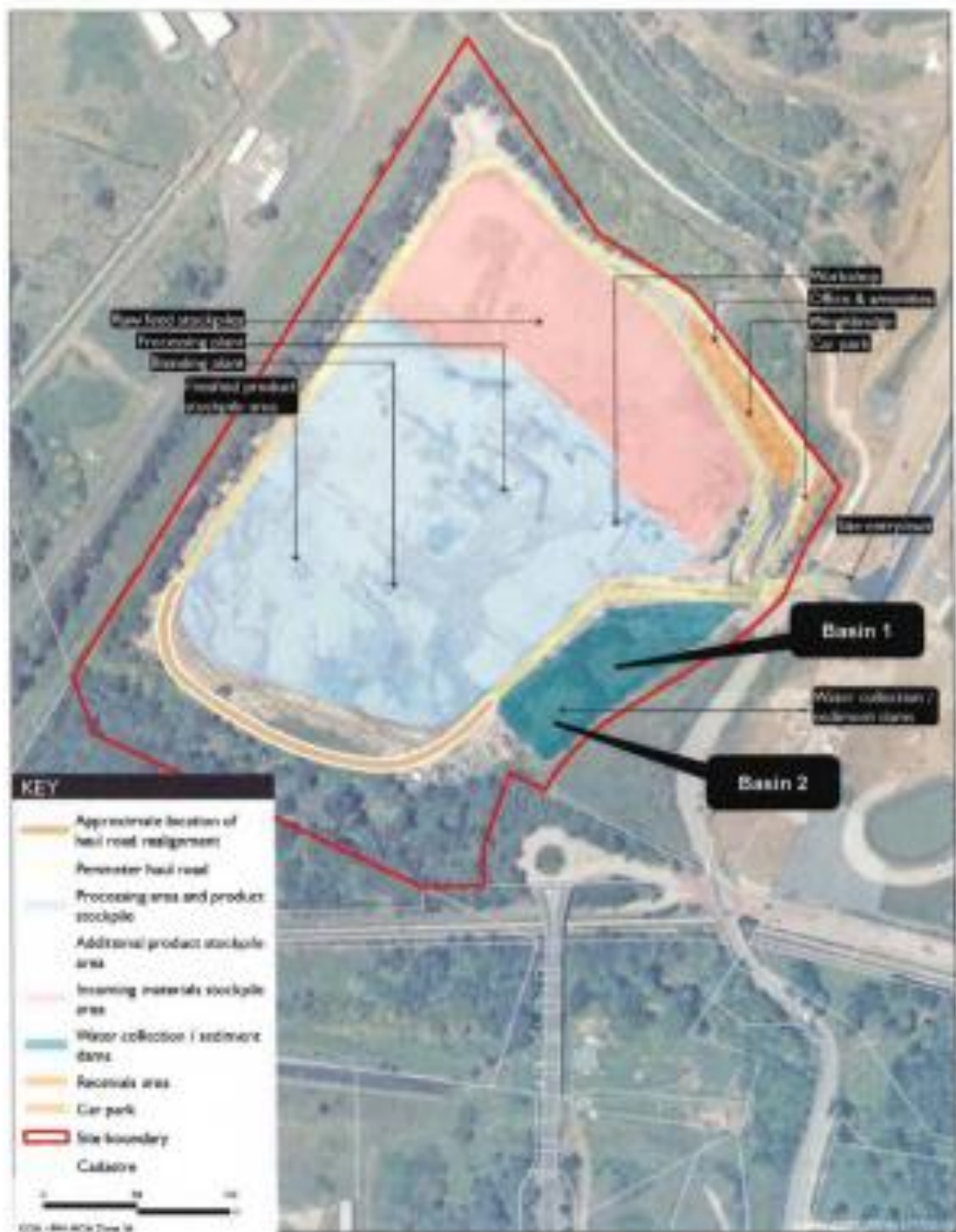


Figure 1: Site layout. (Extracted from Appendix 1 of Development Consent SSD 6625)

Appendix C | Independent Audit Table

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
SCHEDULE A				
Application No.:	SSD 6525			
Applicant:	Boral Recycling Pty Ltd			
Consent Authority:	Minister for Planning			
Land:	Widemere Road, Wetherill Park (Lots <u>4000 and</u> 4001 DP 1173524)			
Development:	Increase in processing capacity of an existing resource recovery facility to 1,000,000 tonnes per annum of non-putrescible construction and demolition waste.			

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
B1 - OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT	In addition to meeting the specific performance criteria established under this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the Development.	Concluded by auditor after review of all other aspects of audit	All practicable measures are being implemented. The facility has a good history of environmental management with no prevention, clean-up or penalty notices issued by the EPA and is continuing to work through PRPs with the EPA.	Compliant
B2 - TERMS OF CONSENT	The Applicant shall carry out the Development in accordance with the: (a) EIS;	Concluded by auditor after review of all other aspects of audit	Based on this audit and site inspection it is believed the development is generally being carried out in accordance with the conditions of approval and all relevant environment assessment documents.	Compliant
	The Applicant shall carry out the Development in accordance with the: (b) RTS;	Concluded by auditor after review of all other aspects of audit	Based on this audit and site inspection it is believed the development is generally being carried out in accordance with the conditions of approval and all relevant environment assessment documents.	Compliant
	The Applicant shall carry out the Development in accordance with the: (c) Development layout plans and drawings in the EIS (see Appendix 1); and	Concluded by auditor after review of all other aspects of audit	Based on this audit and site inspection it is believed the development is generally being carried out in accordance with the conditions of approval and all relevant environment assessment documents.	Compliant
	The Applicant shall carry out the Development in accordance with the: (d) the Management and Mitigation Measures (see Appendix 2).;	Concluded by auditor after review of all other aspects of audit	Based on this audit and site inspection it is believed the development is generally being carried out in accordance with the conditions of approval and all relevant environment assessment documents.	Compliant
B3 - TERMS OF CONSENT	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	Noted	The previous audit found an inconsistency associated with Condition C1 and the management and mitigation measures (Appendix 2), where the condition requires the preparation and approval of a waste monitoring program but Appendix 2 states the existing waste protocols will be implemented. This inconsistency is not material to operation of the facility as the waste monitoring program has been prepared and is being reviewed by DPE. Noted by this audit.	Not Triggered
B4 - TERMS OF CONSENT	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of: (a) any reports, plans or correspondence that are submitted in accordance with this consent; and	Status of the OEMP update. Correspondence issued by DPIE	Condition D2 requires preparation of an OEMP prior to commencement of the expanded operations subject to Development Consent SSD 6525. The expanded operations have not commenced and will not commence during the timeframe of this audit. Notwithstanding, Boral has prepared the OEMP, which was submitted to DPE in December 2017. DPE responded on 19/01/2018 and requested further work on the OEMP to ensure it complies with Condition D2, and further consultation with EPA. Status of the OEMP update. Letter from Chris Ritchie (DPIE) date 28/05/2020 sighted which details satisfaction of OEMP in line with condition D4 subject to: -OEMP is to be updated to include new sampling method once approved by EPA under the WMP -The Ground water monitoring plan not approved and required 6 months after expanded operations -SWMP must be provided and updated with EPA's comments prior to any controlled discharges. A letter to EPA dated 10 August 2020 sighted which details that: "During a sustained wet weather event, that exceeded 45 millimetres over a five day period that commenced Sunday 26-Jul-2020 and continued through till Tuesday 28-Jul-2020, the large sediment basin located on the Site overtopped causing stormwater to be discharged from the Site." This was done without an approved SWMP being in place. EPA responded to a the incident in an email dated 10 November 2020 "The EPA has reviewed the information provided and address all the elements associating with the incident, based on these information the EPA concluded that no further regulatory actions will be taken in this instance. However the EPA reminds Boral of their obligation to comply with the conditions under the pollution reduction program of its EPL 11815 until these PRP are considered completed by the EPA and removed from this licence." OEMP currently under review, and it is noted that expanded operations have not yet commenced, so while this process has not been closed out, it is compliant.	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of: (b) the implementation of any actions or measures contained within these reports, plans or correspondence.	as per B4 (a)	<p>Condition D2 requires preparation of an OEMP prior to commencement of the expanded operations subject to Development Consent SSD 6525. The expanded operations have not commenced and will not commence during the timeframe of this audit. Notwithstanding, Boral has prepared the OEMP, which was submitted to DPE in December 2017. DPE responded on 19/01/2018 and requested further work on the OEMP to ensure it complies with Condition D2, and further consultation with EPA. Status of the OEMP update.</p> <p>Letter from Chris Ritchie (DPIE) date 28/05/2020 sighted which details satisfaction of OEMP in line with condition D4 subject to:</p> <p>-OEMP is to be updated to include new sampling method once approved by EPA under the WMP</p> <p>-The Ground water monitoring plan not approved and required 6 months after expanded operations</p> <p>-SWMP must be provided and updated with EPA's comments prior to any controlled discharges. A letter to EPA dated 10 August 2020 sighted which details that: "During a sustained wet weather event, that exceeded 45 millimetres over a five day period that commenced Sunday 26-Jul-2020 and continued through till Tuesday 28-Jul-2020, the large sediment basin located on the Site overtopped causing stormwater to be discharged from the Site." This was done without an approved SWMP being in place.</p> <p>EPA responded to a the incident in an email dated 10 November 2020 "The EPA has reviewed the information provided and address all the elements associating with the incident, based on these information the EPA concluded that no further regulatory actions will be taken in this instance. However the EPA reminds Boral of their obligation to comply with the conditions under the pollution reduction program of its EPL 11815 until these PRP are considered completed by the EPA and removed from this licence."</p> <p>OEMP currently under review, and it is noted that expanded operations have not yet commenced, so while this process has not been closed out, it is compliant.</p>	Compliant
B5 - LIMITS OF CONSENT	This consent lapses five years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under section 95 of the EP&A Act.	Noted	The definition of "expanded operations" in the SSD is triggered when annual production exceeds 750,000 tonnes, to date, Boral has not triggered this definition. However, substantial commencement has occurred, with the haul road construction completed in December 2019.	Not Triggered
B6 - LIMITS OF CONSENT	The Applicant shall not receive or process on the site more than 1,000,000 tonnes of waste (as expressly permitted by an EPL) per year.	Waste records OEMP	<p>Section 4 page 76 of WMP states: "the capacity is limited to 1,000,000tpa"</p> <p>According to the annual review by Boral for the period 25 November 2018 - 24 November 2019 (dated January 2020) the site processed 639,396 tonnes within that reporting period</p> <p>Annual returns do not contain waste amounts</p>	Compliant
B7 - LIMITS OF CONSENT	The Applicant shall not cause, permit or allow any materials or waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by an EPL.	Annual returns Waste records\waste reject records Incident reporting OEMP	<p>Loads are inspected at the weighbridge and dumping area. Waste is rejected if it does not comprise material listed under Condition L4.1 of the EPL. If other material is observed by spotters the load is rejected and reloaded. Some comingled contaminants such as plastic, timber and metal is separated during processing and either sent to landfill or offsite recycling facility.</p> <p>WARRP monthly reports sighted dating November 2019 to November 2020. All waste types documented in line with the activities and descriptions outlined in condition with the majority of waste pertaining to construction waste.</p> <p>Sighted the waste rejection records for the past year. shows the records are regularly rejected for the unpermitted waste, which is normally fibrous materials. also shown soils\clay\dirt (sighted 21/1 1and 25/11)</p>	Compliant
B8 - LIMITS OF CONSENT	Virgin excavated natural material (VENM), timber, metal, plastic, glass, paper and cardboard, tree cuttings and tree trunks) when mixed with inert waste may only comprise up to 20% by mass of all stockpiles on the site at any one time.	Annual returns Site inspection to verify Waste records\waste reject records Incident reporting OEMP	<p>Sighted the waste rejection records for the past year. shows the records are regularly rejected for the unpermitted waste, which is normally fibrous materials. also shown soils\clay\dirt (sighted 21/1 1and 25/11)</p> <p>Boral's final product is a road base and it needs to meet a criteria much less than 20%. Sighted foreign materials test results for 2020. There are three types in the stockpile trackers and this would come in well below 5% (records sighted are generally less than this). This was since July 2019 to current</p>	Compliant
B9 - LIMITS OF CONSENT	Stockpiles of permitted waste and recycled product shall not be more than twenty (20) metres above ground level.	OEMP Site inspection to verify	<p>One point lesson for Stockpile Heights is provided in Appendix L of OEMP</p> <p>The stockpiles are measured every month against the height of a 19m high onsite silo. The month and erosion inspecting the stockpile heights are recorded. Sighted monthly checklist for 2020 to date.</p>	Compliant
B10 - STAGED SUBMISSION OF PLANS OR PROGRAMS	With the approval of the Secretary, the Applicant may: (a) submit any strategy, plan or program required by this consent on a progressive basis; and/or	N/A	Boral has not requested the progressive submission, or combination of, any plans required under the consent	Not Triggered
	With the approval of the Secretary, the Applicant may: (b) combine any strategy, plan or program required by this consent.	N/A	Boral has not requested the progressive submission, or combination of, any plans required under the consent	Not Triggered
B11 - STAGED SUBMISSION OF PLANS OR PROGRAMS	If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program shall clearly describe the specific stage to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program. A clear relationship between the strategy, plan or program that is to be combined shall be demonstrated.	N/A	Boral has not requested the progressive submission, or combination of, any plans required under the consent	Not Triggered

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
B12 - EVIDENCE OF CONSULTATION	Where consultation with any public authority is required by the conditions of this consent, the Applicant shall: (a) consult with the relevant public authority prior to submitting the required documentation to the Secretary or the PCA for approval, where required;	Consultation records\info as noted in Findings	<p>The following conditions require Boral to consult with public authorities (It is noted much of this correspondence is for management plans under the expanded operations, however, the expanded operations have not commenced yet). The relevant agency and date consultation occurred, confirmed by observations during the audit, are listed.</p> <ul style="list-style-type: none"> - C1: Letter to Melissa Ward of EPA regarding waste monitoring program from Jason Sweeney - dated 27/10/2017. Not done within 3 months of consent as noted in C1. Included in Appendix C of WMP. No response from EPA sighted. No further action required. - C10: Letter to EPA from Boral dated 27 October 2017 sighted, where Boral submitted draft doc to EPA; and between EPA and DPIE; The EPA response to DPIE refers to the review of the draft of other documents, but not NMP. Assume that there is no issue on NMP. - C17: Letter to Melissa Ward of EPA regarding dust management plan from Jason Sweeney - dated 27/10/2017. Included in Appendix C of WMP. Letter from Jason Sweeney to Melissa Ward (EPA) dated 27 October 2017 sighted which included Dust Management Plan. Secretary approval of DMP (part of OEMP which was approved) sighted letter dated 28/5/18 -C38: EPA regarding a groundwater monitoring program - EPA not consulted during the preparation of this report, as per EPA's letter to DPIE dated 3/4/18 however this report was being provided in advance of what was actually required and will be updated and resubmitted to the EPA. - C41: EPA regarding surface water mitigation and monitoring plan. This plan is required to be prepared prior to any controlled discharges, however, there have been no controlled discharges since the consent. The plan has been prepared and submitted to EPA and DPIE for review (revised plan submitted 7/12/2017). Have sighted correspondence with agencies on a range of requests; this is now with EPA to review. -C43: EPA regarding water quality validation report - this report is required to be submitted within three months of implementing the above plan as required. Boral waiting on EPA to advise on status of review of PRP document before it can progress to water quality validation stage. -C46: EPA regarding an independent surface water audit - the audit is required following completion of the above report, however, as noted above; the report has not been required yet. Boral waiting on EPA to advise on status of review of PRP document before it can progress to water quality validation stage. - D7: relevant agencies regarding this independent audit - DPIE (letter sent 10/11/2020), EPA (telephone correspondence 4/11/2020, email response received 5/11/2020), Fairfield City Council ((letter sent 10/11/2020, response received 11/11/2020). See consultation schedule for details Incident Report to EPA dated 10 August 2020 sighted and pertaining to Widemere Recycling Facility (EPL 11815) – Stormwater Discharge Incident which stated: "This report has been prepared in response to the event self-reported by Boral Resource (NSW) Pty Ltd (Boral) on Monday 27-Jul-2020 regarding discharge from the Boral Widemere Recycling site located at 38 Widemere Rd WETHERILL PARK NSW 2164 (the Site) during a sustained wet weather event. This report has been prepared in accordance with the EPA request for Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020." No notification provided to the Secretary as it was not considered to be a breach of the conditions of consent. 	Non-Compliant
	Where consultation with any public authority is required by the conditions of this consent, the Applicant shall: (b) submit evidence of this consultation as part of the relevant documentation required by the conditions of this consent; and	Consultation records Correspondence with agencies.	<p>The following conditions require Boral to consult with public authorities (It is noted much of this correspondence is for management plans under the expanded operations, however, the expanded operations have not commenced yet). The relevant agency and date consultation occurred, confirmed by observations during the audit, are listed.</p> <ul style="list-style-type: none"> - C1: Letter to Melissa Ward of EPA regarding waste monitoring program from Jason Sweeney - dated 27/10/2017. Not done within 3 months of consent as noted in C1. Included in Appendix C of WMP. No response from EPA sighted No further action required. - C10: Letter to EPA from Boral dated 27 October 2017 sighted, where Boral submitted draft doc to EPA; and between EPA and DPIE; The EPA response to DPIE refers to the review of the draft of other documents, but not NMP. Assume that there is no issue on NMP. - C17: Letter to Melissa Ward of EPA regarding dust management plan from Jason Sweeney - dated 27/10/2017. Included in Appendix C of WMP. Letter from Jason Sweeney to Melissa Ward (EPA) dated 27 October 2017 sighted which included Dust Management Plan. Secretary approval of DMP (part of OEMP which was approved) sighted letter dated 28/5/18 -C38: EPA regarding a groundwater monitoring program - EPA not consulted during the preparation of this report, as per EPA's letter to DPIE dated 3/4/18 - but see further detail in a) above - C41: EPA regarding surface water mitigation and monitoring plan. This plan is required to be prepared prior to any controlled discharges, however, there have been no controlled discharges since the consent. The plan has been prepared and submitted to EPA and DPIE for review (revised plan submitted 7/12/2017). Have sighted correspondence with agencies on a range of requests; this is now with EPA to review. -C43: EPA regarding water quality validation report - this report is required to be submitted within three months of implementing the above plan as required. Boral waiting on EPA to advise on status of review of PRP document before it can progress to water quality validation stage. -C46: EPA regarding an independent surface water audit - the audit is required following completion of the above report, however, as noted above; the report has not been required yet. Boral waiting on EPA to advise on status of review of PRP document before it can progress to water quality validation stage. - D7: relevant agencies regarding this independent audit - DPIE (letter sent 10/11/2020), EPA (telephone correspondence 4/11/2020, email response received 5/11/2020), Fairfield City Council ((letter sent 10/11/2020, response received 11/11/2020). See consultation schedule for details Incident Report to EPA dated 10 August 2020 sighted and pertaining to Widemere Recycling Facility (EPL 11815) – Stormwater Discharge Incident which stated: "This report has been prepared in response to the event self-reported by Boral Resource (NSW) Pty Ltd (Boral) on Monday 27-Jul-2020 regarding discharge from the Boral Widemere Recycling site... during a sustained wet weather event. This report has been prepared in accordance with the EPA request for Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020." No notification provided to the Secretary as it was not considered to be a breach of the conditions of consent. 	Non-Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
	Where consultation with any public authority is required by the conditions of this consent, the Applicant shall: (c) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant or any person acting on this development consent.	Consultation records as per B12 (a) - any updates since 2017 in relation to EPA regarding management plans	The following conditions require Boral to consult with public authorities (It is noted much of this correspondence is for management plans under the expanded operations, however, the expanded operations have not commenced yet). The relevant agency and date consultation occurred, confirmed by observations during the audit, are listed. - C1: Letter to Melissa Ward of EPA regarding waste monitoring program from Jason Sweeney - dated 27/10/2017. Not done within 3 months of consent as noted in C1. Included in Appendix C of WMP. No response from EPA sighted No further action required. - C10: Letter to EPA from Boral dated 27 October 2017 sighted, where Boral submitted draft doc to EPA; and between EPA and DPIE; The EPA response to DPIE refers to the review of the draft of other documents, but not NMP. Assume that there is no issue on NMP. - C17: Letter to Melissa Ward of EPA regarding dust management plan from Jason Sweeney - dated 27/10/2017. Included in Appendix C of WMP. Letter from Jason Sweeney to Melissa Ward (EPA) dated 27 October 2017 sighted which included Dust Management Plan. Secretary approval of DMP (part of OEMP which was approved) sighted letter dated 28/5/18 -C38: EPA regarding a groundwater monitoring program - EPA not consulted during the preparation of this report, as per EPA's letter to DPIE dated 3/4/18 but see further detail in a) above - C41: EPA regarding surface water mitigation and monitoring plan. This plan is required to be prepared prior to any controlled discharges, however, there have been no controlled discharges since the consent. The plan has been prepared and submitted to EPA and DPIE for review (revised plan submitted 7/12/2017). Have signed correspondence with agencies on a range of requests; this is now with EPA to review. -C43: EPA regarding water quality validation report - this report is required to be submitted within three months of implementing the above plan as required. Boral waiting on EPA to advise on status of review of PRP document before it can progress to water quality validation stage. -C46: EPA regarding an independent surface water audit - the audit is required following completion of the above report, however, as noted above; the report has not been required yet. Boral waiting on EPA to advise on status of review of PRP document before it can progress to water quality validation stage. - D7: relevant agencies regarding this independent audit - DPIE (letter sent 10/11/2020), EPA (telephone correspondence 4/11/2020, email response received 5/11/2020), Fairfield City Council (letter sent 10/11/2020, response received 11/11/2020). See consultation schedule for details Incident Report to EPA dated 10 August 2020 sighted and pertaining to Widemere Recycling Facility (EPL 11815) – Stormwater Discharge Incident which stated: "This report has been prepared in response to the event self-reported by Boral Resource (NSW) Pty Ltd (Boral) on Monday 27-Jul-2020 regarding discharge from the Boral Widemere Recycling site located at 38 Widemere Rd WETHERILL PARK NSW 2164 (the Site) during a sustained wet weather event. This report has been prepared in accordance with the EPA request for Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020." No notification provided to the Secretary as it was not considered to be a breach of the conditions of consent.	Non-Compliant
B13 - DISPUTE RESOLUTION	In the event that a dispute arises between the Applicant and Council or a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the development, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.	N/A	Not applicable as there have been no disputes with Council or any other agencies	Not Triggered
B14 - STATUTORY REQUIREMENTS	The Applicant shall ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.	Details of the implementation of the pollution study and reduction program Details of person undertaken, submission date to EPA and contents of Surface Water Discharge Characterisation Assessment, Surface Water Mitigation and Monitoring Plan, and Surface Water Validation Report.	An EPL (11815) was obtained as the facility is a scheduled activity (resource recovery and waste storage). The EPL was amended on 13/12/2016 to incorporate the approved expanded operations. Subsequently, a variation was granted 19 May 2020, which amended Condition L4.1 - to add the activity to receive and store resource recovered glass and sandstone to create a sand blend as defined in the Boral engineered glass sand resource recovery order and exemption 2020. A water pollution study and reduction program was implemented on 07/11/2016, which required the facility to cease discharging water and engage a specialist to characterise pollutants in potential discharges The licence has currently pollution reduction programs (PRPs). The EPA is currently assessing the compliance with these.	Compliant
B15 - METEOROLOGICAL MONITORING	Within 3 months of the date of this consent, the Applicant shall ensure that there is a suitable meteorological station on the site that complies with the requirements in the latest version of the Approved Methods for Sampling of Air Pollutants in New South Wales. The meteorological station must be operated and maintained for the life of the Development	Site inspection to verify Service reports and maintenance checklists Meteorological monitoring data	Correspondence from the meteorological station installer (Thompson Environmental Systems - 17/01/2017) which confirms the current meteorological station location as complying with the 'approved methods' was sighted in the 2017 audit. Sighted the weather monitoring on site for Nov20 and Oct20. Issue with columns noted - Phil to sort this. Sighted calibration for 2017, next one due on Jan21. Maintenance done in May20 this year (sighted) for MMP 1000 by Thomson Enviro Systems. showed parts and work completed.	Compliant
B16 - UTILITIES AND SERVICES	Prior to the construction of any utility works associated with the Development, the Applicant shall obtain relevant approvals from service providers.	N/A	No further plans for any utility works.	Not Triggered
B17 - COMPLIANCE	The Applicant shall ensure that employees, contractors and sub-contractors are aware of, and comply with, the conditions of this consent relevant to their respective activities.	Induction records GRP-HSEQ-2-03 Training Competency and Awareness OEMP Sequence extract Site inspection to verify conditions available onsite; personnel familiarity Complaints/Incidents	OEMP Section 9 page 49 outlines training for site staff and subcontractor staff Sighted SEQ yellow level markers faded and that's noted, there was a truck leaving site and it had no cover on it and this was noted. In this instance, supplier would have been contacted and given a first and final	Compliant
B18 - COMPLIANCE	The Applicant shall be responsible for environmental impacts resulting from the actions of all persons that it invites onto the site, including contractors, subcontractors and visitors.	Induction records OEMP Site inspection to verify conditions available onsite; personnel familiarity Complaints/Incidents	OEMP Section 9 page 49 outlines training for site staff and subcontractor staff includes basic environmental awareness. Table 7.1 page 42 of OEMP (EMM, May 2018) There was an induction in the site office. Drivers are provided a driver code of conduct; Sighted SEQ noted, there was a truck leaving site and it had no cover on it and this was noted. In this instance, supplier would have been contacted and given a first and final	Compliant
B19 - COMPLIANCE	The Secretary at any time may require an update on compliance with all, or any part, of the conditions of this consent. Any such update shall meet the requirements of the Secretary and be submitted within such period as the Secretary may agree.	Interview with proponent	No requests have been received. This independent environmental audit provides an update on compliance with the conditions of consent.	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
B20 - COMPLIANCE	The Applicant shall meet the requirements of the Secretary in respect of the implementation of any measure necessary to ensure compliance with the conditions of this consent, and general consistency with the EIS and those documents listed under Condition 62. The Secretary may direct that such a measure be implemented in response to the information contained within any report, plan, correspondence or other document submitted in accordance with the conditions of this consent, within such time as the Secretary may agree	Current status of OEMP review & approval, relevant correspondence with agencies	Condition D2 requires preparation of an OEMP prior to commencement of the expanded operations. The expanded operations have not commenced and will not commence during the timeframe of this audit. Notwithstanding, Boral has prepared the OEMP, which was submitted to DPE in December 2017. DPE responded on 19/01/2018 and requested further work on the OEMP to ensure it complies with Condition D2, and further consultation with EPA. The OEMP is being amended accordingly and will be submitted for approval prior to commencement of expanded operations.	Compliant
B21 - OPERATION OF PLANT AND EQUIPMENT	The Applicant shall ensure that all plant and equipment used for the Development is: (a) maintained in a proper and efficient condition; and	Site inspection to verify Induction records; operators' competencies Maintenance records	EaM work order summary (PMs), site to provide records Boral has Maximo system which is a electronic asset management system and every piece of equipment is assigned a number and under it sits all work orders. All schedules are set up for all equipment. E.g. feeder vibrating feed - monthly checks weekly checks and every month has set target. Sighted work order, this is issued by Boral maintenance people. The work order has the condition checks that are required. <u>Fence inspection sighted for 1mth interval. This would be done by onsite staff. If it is a piece of heavy earthworks gear, this would be a licenced contractor and a much</u> EaM work order summary (PMs), There is a skills matrix for staff Learner transcript. Viewed Domenic Caccamo records viewed and this has in there that a wide range of competency in Cert II in surface extraction operations, has conveyor operations, crushing operation, air quality standards, risk controls, asbestos awareness, VOC, fixed plant crushing and screening, isolation of worker. Peter (FEL operator), sighted wheel loader VOC as well as artic haul truck , loader etc. These are current and required every 3 years.	Compliant
	The Applicant shall ensure that all plant and equipment used for the Development is: (b) operated in a proper and efficient manner.			Compliant
B22 - DEVELOPMENT CONTRIBUTIONS	The Applicant must pay a levy of the percentage authorised by Fairfield City Council Indirect (Section 94A) Development Contributions Plan 2011 , of the proposed cost of carrying out the development. The levy must be paid prior to the commencement of the expanded operations. A copy of the receipt for the payment must be submitted to the Department within two months of payment. The amount of the levy that is payable to Council, calculated as at the date of the grant of this development consent is \$1 ,641.12.	Evidence of levy payment	The most recent annual contribution was due and made on 19/01/2017 (in last audit period). The next contribution is due prior to start of expended operations, which is yet to commence.	Not Triggered
B23 - NOTIFICATION AND SURRENDER OF	Prior to the commencement of the expanded operations, the Applicant shall provide written notification in the manner prescribed by Clause 97 of the Environmental Planning and Assessment Regulations 2000, and surrender the following consent: (a) DA No. 21-1-2002-1 granted by the Minister for Planning on 25 November 2002 for the construction and operation of a construction materials recycling facility.	Written notification evidence as per condition	A letter from Boral dated 06/03/2018 notifying DPE of the intent to surrender DA 21-1-2002-1 was sighted.	Not Triggered

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
WASTE MANAGEMENT				
C1 - Waste Monitoring Program	The Applicant shall prepare a Waste Monitoring Program for the Development. This program must: (a) be prepared in consultation with the EPA by a suitably qualified and experienced expert within 3 months of the date of this consent;	Waste monitoring program EPA certification of expert and consultation evidence	Waste Monitoring Program prepared by EMM dated 5 April 2018 sighted. This plan was not prepared within three months of the consent Letter to EPA from Boral dated 27 October 2017 sighted, where Boral submitted draft docs to EPA; and between EPA and DPIE; The EPA response refers to the review of the draft and the response provided. No response from EPA provided in OEMP. However, the UFP is still under discussion with the EPA.. CV detailing the qualification and experience of person preparing (Lawrence Wallis) submitted to DPIE via email 19 December 2017. Bianca Thornton (DPIE) in email dated 19 December 2017 acknowledged receipt. No further action required	Non-Compliant
	The Applicant shall prepare a Waste Monitoring Program for the Development. This program must: (b) include suitable provision to monitor the: (i) quantity, type and source of waste received on site; and	Waste monitoring program	Waste Monitoring Program prepared by EMM dated 5 April 2018 sighted. Chapter 4 section 4.2 Waste Monitoring and Tracking page 9 and Appendix A Inspection and Receipts protocol allows for the quantity, type and source of waste received on site to be recorded	Compliant
	The Applicant shall prepare a Waste Monitoring Program for the Development. This program must: (b) include suitable provision to monitor the: (ii) quantity, type and quality of the outputs produced on site.	Waste monitoring program	Waste Monitoring Program prepared by EMM dated 5 April 2018 sighted. Chapter 4 section 4.3 and 4.4 Waste Monitoring and Tracking page 9 and Appendix A Inspection and Receipts protocol allows for the quantity, type and outputs produced onsite	Compliant
	The Applicant shall prepare a Waste Monitoring Program for the Development. This program must: (c) ensure that: (i) all waste that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; and	Waste monitoring program	Waste Monitoring Program prepared by EMM dated 5 April 2018 sighted. Section 4.2.4 Includes protocols for tracking received waste	Compliant
	The Applicant shall prepare a Waste Monitoring Program for the Development. This program must: (c) ensure that: (ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.	Staff induction/training records particularly for Appendix A and take 5 form Waste monitoring program	Waste Monitoring Program prepared by EMM dated 5 April 2018 sighted. Appendix A Inspection and Receipts Protocol and chapter 7 including 7.1 for Asbestos awareness training Viewed wall mounted information on waste management and asbestos recognition. Site inspection induction list for everyone on site RAPID, and this has an expiry date entered against each person. Try to do everyone in Jan, and these are valid for one year. Part of this is general enviro awareness and this includes water, dust, noise, chem & fuel storage. and there is also training on inspection and receipts. Sighted presentations, and list of the total inductions which was 134 since Sept 20, Driver inductions and runs through speed limits, dust control. HSE inductions in the crew list, and there's an online induction for all Boral employees. Sighted training register showing that this was completed for Domenic Caccamo and Domenico Caccamo, and Ben Cumberland. Everyone has training on and acknowledge of Environment policy. Site specific induction W Park Tipper Fleet induction HSEQ & Induction Course Boral Product Line Induction - Quarries (e.g. drilling & blasting, haul roads)	Compliant
C2 - Waste Monitoring Program	The Applicant shall carry out the Development in accordance with the Waste Monitoring Program approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Correspondence with agencies regarding Approval by Secretary	The waste monitoring program has not been approved yet and therefore it has not been implemented. This presents a low environmental risk as the inspection and receipts protocol in Appendix A.3 of the existing OEMP is being implemented.	Not Triggered

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status																																		
NOISE AND VIBRATION																																						
C3 - Construction and Operation Hours	<p>The Applicant shall comply with the construction and operation hours in Table 1 unless otherwise agreed to in writing by the Secretary</p> <p>Table 1: Hours of Construction and Operation</p> <table><tr><th>Activity</th><th>Day</th><th>Hours</th></tr><tr><td rowspan="3">Construction</td><td>Monday to Friday</td><td>7 am to 6 pm</td></tr><tr><td>Saturday</td><td>8 am to 1 pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr><tr><td rowspan="8">Operation</td><td colspan="2">Processing, Receipt and Dispatch Activities:</td></tr><tr><td>Monday to Saturday</td><td>6 am to midnight</td></tr><tr><td>Sunday</td><td>6 am to 6 pm (one Sunday per calendar month)</td></tr><tr><td>Public Holidays</td><td>Nil</td></tr><tr><td colspan="2">Ancillary Operations:</td></tr><tr><td>Monday to Saturday</td><td>6 am to midnight</td></tr><tr><td>Sunday</td><td>6 am to 6 pm</td></tr><tr><td>Public Holidays</td><td>Nil</td></tr></table> <p><i>Note: Ancillary Operations means any servicing and/or maintenance of the equipment/machinery associated with the development, loading and unloading of material onto/from vehicles and stockpiles and the selling of recycled product.</i></p>	Activity	Day	Hours	Construction	Monday to Friday	7 am to 6 pm	Saturday	8 am to 1 pm	Sunday & Public Holidays	Nil	Operation	Processing, Receipt and Dispatch Activities:		Monday to Saturday	6 am to midnight	Sunday	6 am to 6 pm (one Sunday per calendar month)	Public Holidays	Nil	Ancillary Operations:		Monday to Saturday	6 am to midnight	Sunday	6 am to 6 pm	Public Holidays	Nil	Weighbridge Report Sign-in records Operational records	OEMP (dated May 2018) page 2 table 1.1 section 1 outlines hours of operation in line with C3 table 1 There have been no complaints regarding noise according to complaints register on website Widemere Sunday Production Tracker Spreadsheet Sighted no public holidays appear to have been operated on, Several Sundays are recorded including 5 April 2020, 12 July 2020, and 18 October 2020. This was "production activities" which were in line with the allowance under the operation in Table C3. Sighted register and discussed onsite. Boral advised that the haul road was put in using returned concrete from concrete agitator trucks, and the site gates were closed at 4.30pm each day as a per the norm. As such, the concrete for the road construction was put in place by Boral site operators during these hours and aligned with the delivery of concrete from the agitators trucks.	Compliant							
Activity	Day	Hours																																				
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C4 - Construction and Operation Hours	<p>The Applicant must keep a record of Sunday works as identified in Table 1.</p>	Sunday work records	Widemere Sunday Production Tracker Spreadsheet Sighted Several Sundays are recorded including 5 April 2020, 12 July 2020, and 18 October 2020. This was "production activities" which were in line with the allowance under the operation in Table C3. Sighted register and discussed onsite.	Compliant																																		
C5 - Construction and Operation Hours	<p>Condition C3 does not apply to any activity that is required to be performed by police or other authorities for safety reasons; and/or if there is an on-site emergency that poses an immediate danger to personnel or equipment; and/or the operation or personnel or equipment is endangered. In such circumstances, prior notification shall be provided to the EPA and any affected residents as soon as possible, or within a reasonable period in the case of emergency.</p>	N/A	Noted, has not occurred to date. Instance of break in where police attended site, but this was on a Monday	Compliant																																		
C6 - Operational Noise Limits	<p>The Applicant shall ensure noise from the operation does not exceed the limits in Table 2 below.</p> <p>Table 2: Noise Limits (dB(A))</p> <table><tr><th rowspan="2">Location</th><th colspan="4">Noise Limits (dB(A))</th><th rowspan="2">Morning Shoulder (6am - 7am)</th></tr><tr><th>Day (7am - 9pm)</th><th>Evening (9pm - 10pm)</th><th colspan="2">Night (10pm - 12am)</th></tr><tr><td></td><td>Limit (dB(A))</td><td>Limit (dB(A))</td><td>Limit (dB(A))</td><td>Limit (dB(A))</td><td>Limit (dB(A))</td></tr><tr><td>71 Munro Street, Greystanes</td><td>39</td><td>38</td><td>35</td><td>50</td><td>39</td></tr><tr><td>146 Daruga Avenue, Nelsons Ridge</td><td>35</td><td>35</td><td>35</td><td>50</td><td>35</td></tr><tr><td>Greystanes Estate - Future southern extent¹</td><td>39</td><td>37</td><td>35</td><td>50</td><td>39</td></tr></table> <p><i>Note:</i></p> <p><i>Note 1: Identified as Location RTD in Widemere Recycling Facility - Noise Impact Assessment (NIA) prepared by EMGA Mitchell McLennan (Ref J13127RP1 dated 27 April 2018).</i></p> <p><i>Note 2: Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the Industrial Noise Policy.</i></p>	Location	Noise Limits (dB(A))				Morning Shoulder (6am - 7am)	Day (7am - 9pm)	Evening (9pm - 10pm)	Night (10pm - 12am)			Limit (dB(A))	Limit (dB(A))	Limit (dB(A))	Limit (dB(A))	Limit (dB(A))	71 Munro Street, Greystanes	39	38	35	50	39	146 Daruga Avenue, Nelsons Ridge	35	35	35	50	35	Greystanes Estate - Future southern extent ¹	39	37	35	50	39	Noise monitoring records	OEMP (dated May 2018) page 13 Table 5.1 section 5.1.2 Performance Criteria is in line with C6 ES2 Noise and Vibration on page E.1 in OEMP states that "Monitoring will occur within one year of the date of the consent and every three years thereafter as well as in response to complaints regarding noise" There have been no complaints regarding noise according to complaints register on website Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (dated January 2020) sighted. Section 3.2.1 pertains to Noise Monitoring undertaken in May 2019. All monitoring was undertaken with the same method, frequency and measurements as outlined in condition. The operational noise from the site was inaudible during all monitoring periods when the site was operating thus no exceedances were noted. Noise compliance assessment (EMM dated June 2020) sighted All monitoring was undertaken with the same method, frequency and measurements as outlined in condition. The operational noise from the site was inaudible during all monitoring periods when the site was operating thus no exceedances were noted.	Compliant
Location	Noise Limits (dB(A))				Morning Shoulder (6am - 7am)																																	
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Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
C7 - Noise and Vibration Monitoring	The Applicant shall carry out noise and/or vibration monitoring in accordance with any requirements in the EPL. This shall include verification that the facility is operating in accordance with the criteria outlined in Condition C6.	Noise monitoring	The EPL sets out locations for noise monitoring but does not indicate when noise must be monitored ES2 Noise and Vibration on page E.1 in OEMP states that "Monitoring will occur within one year of the date of the consent and every three years thereafter as well as in response to complaints regarding noise" Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (dated January 2020) sighted. Section 3.2.1 pertains to Noise Monitoring undertaken in May 2019. All monitoring was undertaken with the same method, frequency and measurements as outlined in condition. The operational noise from the site was inaudible during all monitoring periods when the site was operating thus no exceedances were noted. There have been no complaints regarding noise according to complaints register on website	Compliant
C8 - Vibration Criteria	The Applicant shall ensure that vibration resulting from the development does not exceed the continuous or impulsive vibration criteria in the EPA's Assessing Vibration: A Technical Guideline (February 2006) at residential receivers.	Details of the types of plant and equipment currently used. Site inspection to verify OEMP Vibration monitoring	Previous audit report noted that the EIS predicted that the development would not result in vibration impacts to sensitive receivers due to the site's distance from receivers and because the types of equipment proposed to be used do not create significant levels of vibration. Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (dated January 2020) sighted. Section 3.2.1 pertains to Noise Monitoring undertaken in May 2019. All monitoring was undertaken with the same method, frequency and measurements as outlined in condition. The operational noise from the site was inaudible during all monitoring periods when the site was operating thus no exceedances were noted. No complaints relating to vibration noted for the development	Compliant
	The Applicant shall: (a) implement best management practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the development;	Site inspection to verify OEMP	OEMP (dated May 2018) Section 5.1.3 Management and Mitigation Measures page 13 Section 3.5 of NMP page 158 of OEMP - service and maintenance of mobile plant (sighted register onsite) - incorporation of technology to minimise noise from plant - restricting movement of equipment on exposed areas (plant kept to specific locations where each is operated) -Scheduling loading of noisier material at least sensitive time of day -Siting noise equipment behind barriers and away from noise sensitive areas (the site is quite enclosed topographically) -Employing quiet practices when operating plant e.g. position idling trucks in appropriate areas (idling trucks only at specific areas) -Use non-acoustic smart alarms to warn for reversing vehicles (no audible alarms heard while onsite) -Efficient muffler design -Barriers in form of free-standing walls, earth mounds, bunds, or acoustic equipment in trenches etc (materials handling areas quite enclosed topographically) No complaints pertaining to noise recorded As noted for Condition C6, noise is not regularly monitored as monitoring frequency is not stipulated in the EPL. Noise monitoring frequency and method is included in the new OEMP, which is to be implemented prior to commencement of the expanded operations. It is noted that the facility is not in a sensitive location, with the nearest residences over 1km from the site.	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
C9 - Noise Mitigation	The Applicant shall: (b) minimise the noise impacts of the development during adverse meteorological conditions;	Site inspection to verify OEMP	OEMP (dated May 2018) Section 5.1.3 Management and Mitigation Measures page 13 No complaints pertaining to noise recorded As noted for Condition C6, noise is not regularly monitored as monitoring frequency is not stipulated in the EPL. Noise monitoring frequency and method is included in the new OEMP, which is to be implemented prior to commencement of the expanded operations. It is noted that the facility is not in a sensitive location, with the nearest residences over 1km from the site. Measures above seek to limit noise.	Compliant
	The Applicant shall: (c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and	Site inspection to verify Maintenance records OEMP	OEMP (dated May 2018) Section 5.1.3 Management and Mitigation Measures page 13 No complaints pertaining to noise recorded As noted for Condition C6, noise is not regularly monitored as monitoring frequency is not stipulated in the EPL. Noise monitoring frequency and method is included in the new OEMP, which is to be implemented prior to commencement of the expanded operations. It is noted that the facility is not in a sensitive location, with the nearest residences over 1km from the site. Sighted register of maintenance schedule for all plant and equipment This is through Maximo.	Compliant
	The Applicant shall: (d) regularly assess any noise monitoring data and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.	OEMP Noise monitoring records	OEMP (dated May 2018) Section 5.1.3 Management and Mitigation Measures page 13 No complaints pertaining to noise recorded Noise monitoring frequency and method is included in the new OEMP, which is to be implemented prior to commencement of the expanded operations. It is noted that the facility is not in a sensitive location, with the nearest residences over 1km from the site. Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (dated January 2020) sighted. Section 3.2.1 pertains to Noise Monitoring undertaken in May 2019. All monitoring was undertaken with the same method, frequency and measurements as outlined in condition. The operational noise from the site was inaudible during all monitoring periods when the site was operating thus no exceedances were noted.	Compliant
	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Noise Management Plan. The Plan must: (a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA;	Noise management plan Consultation with EPA (as EPA correspondence for NMP not there)	Noise management Plan prepared by EMM dated 22 February 2018 sighted CV of Katie Teyhan attached to NMP, suitably qualified and experienced Member of Australian Acoustical Society Letter to EPA from Boral dated 27 October 2017 sighted, where Boral submitted draft doc to EPA; and between EPA and DPIE; The EPA response to DPIE refers to the review of the draft of other documents, but not NMP. Assume that there is no issue on NMP.	Compliant
	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Noise Management Plan. The Plan must: (b) be approved by the Secretary prior to the commencement of the expanded operations;	Noise management plan Approval by secretary	Noise Management Plan prepared by EMM dated 22 February 2018 sighted Secretary approval of NMP (part of OEMP which was approved) sighted letter dated 28/5/18	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
C10 - Noise Management	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Noise Management Plan. The Plan must: (c) include up to date site plans;	Noise management plan Up-to-date site plans	Noise Management Plan prepared by EMM dated 22 February 2018 sighted Figure 3.1 of NMP page 7 in line with Appendix 1 of this consent	Compliant
	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Noise Management Plan. The Plan must: (d) identify all major sources of noise that may be emitted as a result of the operation of the Development;	Noise management plan	Noise Management Plan prepared by EMM dated 22 February 2018 sighted section 3.4 includes major sources of noise that may be emitted as a result of the operation of the development	Compliant
	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Noise Management Plan. The Plan must: (e) specify the noise criteria as it applies to the particular activity;	Noise management plan	Noise Management Plan prepared by EMM dated 22 February 2018 sighted section 2 includes specific noise criteria as it applies to the particular activity	Compliant
	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Noise Management Plan. The Plan must: (f) include procedures for the monitoring of noise emissions from development, in accordance with any requirements of the EPL;	Noise management plan Monitoring records	Noise Management Plan prepared by EMM dated 22 February 2018 sighted section 2 includes specific noise criteria as it applies to the particular activity. Noise Management Plan (EMM, dated 22 February 2018) sighted. Section 4.3 Monitoring Methodology "Noise monitoring shall be conducted as guided by the following standards and guidelines" Which does not include the NSW Noise Policy (2017) but should be updated to include Widemere Recycling Facility EPL noise compliance assessment (EMM, June 2020) sighted states on page 1: "This report presents the results and findings of the attended noise monitoring conducted on 20 May 2020. The following documents were referenced as part of this assessment: Environment Protection Authority (EPA), Noise Policy for Industry (NPI), (2017)" Refer to EPL schedules for further details	Compliant
	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Noise Management Plan. The Plan must: (g) include protocols for the minimisation of noise emissions including deployment of the noise mitigation measures outlined in Condition C9;	Noise management plan	Noise Management Plan prepared by EMM dated 22 February 2018 sighted section 3.1 and 3.5 include protocols for mitigation measures for noise as outlined in C9	Compliant
	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Noise Management Plan. The Plan must: (h) describe the procedures to be undertaken if any non-compliance is detected; and	Noise management plan Non-compliance/incident register/complaints	Noise Management Plan prepared by EMM dated 22 February 2018 sighted, section 6 outlines protocol for non-compliance There have been no complaints relating to noise recorded Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (dated January 2020) sighted. Section 3.2.1 pertains to Noise Monitoring undertaken in May 2019. The operational noise from the site was inaudible during all monitoring periods when the site was operating thus no exceedances were noted.	Compliant
	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Noise Management Plan. The Plan must: (i) detail the mechanisms to consider and address cumulative noise impacts in the context of development in the Greystanes Estate/ Widemere Area .	Noise management plan	Noise management Plan prepared by EMM dated 22 February 2018 sighted, section 4.2 outlines mechanism to consider for cumulative noise impacts in areas outlined in C10 (i)	Compliant
C11 - Noise Management	The Applicant shall carry out the Development in accordance with the Noise Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Noise management plan Approval by secretary - if available yet?	Letter from Chris Ritchie (DPIE) on behalf of the secretary dated 28 May 2018 sighted states: "The department has reviewed the OEMP and is satisfied it meets the requirements of Condition D4"	Compliant
AIR QUALITY				
C12 - Odour	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Site inspection to verify OEMP	No complaints pertaining to odour recorded OEMP dated May 2018 sighted, nothing pertaining to odour included No odour generating substances received on site. Rejected as per rejected loads register, No odours noted at sight, and no odour producing material present onsite during site inspection	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
C13 - Air Quality	The Applicant shall carry out all reasonable and feasible measures to minimise dust generated by the Development.	Site inspection to verify OEMP	No complaints pertaining to dust recorded within reporting period. However, one occasion a complaint from a passing EPA officer (dated 13/10/2017) was recorded, which was in the previous audit period. OEMP Section 5.2.2 refers to management and mitigation measures including: sprinklers (along roads and areas of high activity), hoses (directed at excavator buckets), speed limits and wheel wash. These are elaborated in Table 2.2 of the Dust Management Plan The use of dust management measures during the site inspection included the sprinklers (along roads and areas of high activity), hoses (directed at material handling piles, sprinklers on the entry road, carpark, workshop, stacker and picking huts, speed limits and wheel wash. Constant running of the water cart and the street sweeper which is also washing down roads.	Compliant
C14 - Air Quality	The Applicant shall carry out air quality monitoring in accordance with any requirements in the EPL.	Air quality monitoring records	Deposited dust is continuously monitored at Monitoring Point 1 and reported on a monthly basis sighted in Boral's Widemere Recycling Environmental Monitoring Report dated September 2020. Insoluble Solids, Ash, and Total Solids are measured g/m ² /mth as per EPL Condition M2.1. Dust bottles are collected monthly and sent to BTMS for testing & analysis. Method of sampling is to AS 3580.10.1-2003- Methods for sampling and analysis of ambient air method 10.1- Determination of particulate matter, Deposited matter- Gravimetric method as per page 32 of Boral Widemere Recycling 2019 Annual Review	Compliant
C15 - Air Quality	The Applicant shall ensure the development complies with any air quality limits in the EPL	Air quality monitoring records OEMP	No air quality limits were established in the EPL. Dust bottles are collected monthly and sent to BTMS for testing & analysis. Method of sampling is to AS 3580.10.1-2003- Methods for sampling and analysis of ambient air method 10.1- Determination of particulate matter, Deposited matter- Gravimetric method as per page 32 of Boral Widemere Recycling 2019 Annual Review Page 47 states: "During the reporting period the annual average for ash at the deposited dust monitoring sites were above the EIS prediction for onsite annual average air quality (4 g/m ² /month)"	Compliant
	The Applicant shall: (a) operate the Development so that air emissions are minimised during all meteorological Conditions;	Air quality monitoring records OEMP Site inspection to verify	No complaints pertaining to dust recorded within reporting period OEMP Section 5.2.2 refers to management and mitigation measures including: sprinklers (along roads and areas of high activity), hoses (directed at excavator buckets), speed limits and wheel wash. These are elaborated in Table 2.2 of the Dust Management Plan Verified during site inspection - see C13.	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
C16 - Air Quality Mitigation	<p>The Applicant shall:</p> <p>(b) implement best management practice, including all reasonable and feasible air emissions mitigation measures to minimise emissions from the Development. including but not limited to:</p> <p>(i) limiting vehicle speed on-site to 30 kilometres per hour;</p> <p>(ii) ensuring all loaded vehicles entering or leaving the site have their loads covered;</p> <p>(iii) ensuring all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads; and</p> <p>(iv) dust sprays through chemical suppressants, water sprays/misters.</p>	<p>Air quality monitoring records</p> <p>OEMP</p> <p>Staff induction</p> <p>Site inspection to verify</p>	<p>OEMP Section 5.2.2 refers to management and mitigation measures including: sprinklers (along roads and areas of high activity), hoses (directed at excavator buckets), speed limits and wheel wash (to be verified during site inspection).</p> <p>Dust monitoring is conducted on a monthly basis at Point 1 to AM-19 (sampling method) as per EPL M2.2 Point # 1. Records from January 2015 - September 2020 sighted as part of Widemere Recycling Environmental Monitoring Report (dated November 2020) published on the website. In interpreting the results it is necessary to refer to the NSW EPA Approved Methods and Guidance – For the Modelling and Assessment of Air Pollutants in NSW. The impact assessment for dust is listed with the maximum annual average of deposited dust being 4g/m2/mth for insoluble solids. Throughout the reporting period, on a number of occasions the gauges have recorded insoluble solids above the goal of 4g/m2/month</p> <p>Verified during site inspection; staff induction details are provided in C1</p>	Compliant
C17 - Dust Management	<p>As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Dust Management Plan. The Plan must</p> <p>(a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA;</p>	<p>Dust Management Plan</p> <p>Consultation with EPA</p> <p>Qualifications of person</p>	<p>Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted.</p> <p>Qualification of person preparing not included; website checked https://ramboll.com/contact/environ/sfishwick</p> <p>Letter from Jason Sweeney to Melissa Ward (EPA) dated 27 October 2017 sighted which included Dust Management Plan. Secretary approval of DMP (part of OEMP which was approved) sighted letter dated 28/5/18</p>	Compliant
	<p>As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Dust Management Plan. The Plan must</p> <p>(b) be approved by the Secretary prior to the commencement of the expanded operations;</p>	<p>Dust Management Plan</p> <p>Approval by secretary - if approved yet?</p>	<p>Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted.</p> <p>Letter from Chris Ritchie (DPIE) on behalf of the secretary dated 28 May 2018 sighted states: "The department has reviewed the OEMP and is satisfied it meets the requirements of Condition D4"</p>	Compliant
	<p>As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Dust Management Plan. The Plan must</p> <p>(c) identify all major sources of dust that may occur as result of the operation of the development;</p>	<p>Dust Management Plan</p>	<p>Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted.</p> <p>Section 2 identifies potential sources of particulate matter emissions</p>	Compliant
	<p>As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Dust Management Plan. The Plan must</p> <p>(d) describe the procedures to manage the emission of dust from the sources identified;</p>	<p>Dust Management Plan</p> <p>Site inspection to verify measures in place</p>	<p>Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted.</p> <p>Section 2 identifies mitigation measures to manage dust emission</p> <p>Verified during site inspection; staff induction details are provided in C1</p>	Compliant
	<p>As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Dust Management Plan. The Plan must</p> <p>(e) identify the locations where monitoring of dust emissions is to be undertaken;</p>	<p>Dust Management Plan</p>	<p>Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 3.1.2 includes the location of monitoring points and as shown in Figure 3-1</p>	Compliant
	<p>As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Dust Management Plan. The Plan must</p> <p>(f) describe the procedures for the monitoring of dust emissions from the development, in accordance with any requirements of the EPL;</p>	<p>Dust Management Plan</p> <p>Monitoring records</p>	<p>Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 3.1.1 includes monitoring methodology and criteria in line with Condition M2 of EPL</p>	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Dust Management Plan. The Plan must (g) provide protocols for regular maintenance of process equipment to minimise the potential for dust emissions;	Dust Management Plan Maintenance records	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 2.1 outlines equipment maintenance regime. Maintenance records to verify undertaken in line with section 2.1 to satisfy condition C17(g) Verified during site inspection; staff induction details are provided in C1; sighted asset register system (Maximo) which raises regular work orders on all equipment and assets onsite	Compliant
	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Dust Management Plan. The Plan must (h) detail the deployment of the mitigation measures identified in Condition C16; and	Dust Management Plan	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Table 2-2 details the deployment of mitigation measures onsite Verified during site inspection; staff induction details are provided in C1	Compliant
	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Dust Management Plan. The Plan must (i) describe the procedures to be undertaken if any non-compliance is detected.	Dust Management Plan Non-compliances	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 4.2 page 13 outlines exceedance event actions. A complaint was registered pertaining to dust, however this occurred outside of the current audit period	Compliant
C18 - Dust Management	The Applicant shall carry out the Development in accordance with the Dust Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary,	Dust Management Plan Approval by secretary	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Letter from Chris Ritchie (DPIE) on behalf of the secretary dated 28 May 2018 sighted states: "The department has reviewed the OEMP and is satisfied it meets the requirements of Condition D4" List of measures in EPP on testing, sweeping, water cart, minimising dust levels etc.	Compliant
C19 - Air Quality Audit	The Applicant shall carry out an Air Quality Audit of the Development no later than six months after the commencement of the expanded operations. The audit must (a) be carried out by a suitably qualified and experienced expert whose appointment has been endorsed by the Secretary;	Qualified person approval by secretary Air quality audit report	Noted, the expanded operations have not commenced	Not Triggered
	The Applicant shall carry out an Air Quality Audit of the Development no later than six months after the commencement of the expanded operations. The audit must (b) audit the Development whilst it is in operation;	Air quality audit report	Noted, the expanded operations have not commenced	Not Triggered
	The Applicant shall carry out an Air Quality Audit of the Development no later than six months after the commencement of the expanded operations. The audit must (c) include a summary of air emission related complaints and any actions that were carried out to address the complaints;	Air quality audit report Complaints register	Noted, the expanded operations have not commenced	Not Triggered
	The Applicant shall carry out an Air Quality Audit of the Development no later than six months after the commencement of the expanded operations. The audit must (d) validate the Development against air quality and odour predictions in the EIS;	Air quality audit report	Noted, the expanded operations have not commenced	Not Triggered
	The Applicant shall carry out an Air Quality Audit of the Development no later than six months after the commencement of the expanded operations. The audit must (e) review design and management practices of the Development against industry best practice for air emissions; and	Air quality audit report	Noted, the expanded operations have not commenced	Not Triggered
	The Applicant shall carry out an Air Quality Audit of the Development no later than six months after the commencement of the expanded operations. The audit must (f) include an action plan that identifies and prioritises additional air and mitigation measures that may be necessary to reduce air emissions.	Air quality audit report	Noted, the expanded operations have not commenced	Not Triggered

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
C20 - Air Quality Audit	Within three months of commissioning this audit, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	Air quality audit report Evidence of submission to secretary	Noted, the expanded operations have not commenced	Not Triggered
C21 - Air Quality Audit	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Air Quality Audit.	Any required	Noted, the expanded operations have not commenced	Not Triggered
SOIL AND WATER				
C22 - Pollution of Waters	The Development shall comply with Section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.	Discussion with proponent on discharge events	Incident Report to EPA dated 10 August 2020 sighted and pertaining to Widemere Recycling Facility (EPL 11815) – Stormwater Discharge Incident which stated: "This report has been prepared in response to the event self-reported by Boral Resource (NSW) Pty Ltd (Boral) on Monday 27-Jul-2020 regarding discharge from the Boral Widemere Recycling site located at 38 Widemere Rd WETHERILL PARK NSW 2164 (the Site) during a sustained wet weather event. This report has been prepared in accordance with the EPA request for Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020." Email Response from Rashad Danoun of EPA dated 10 November 2020 sighted which states: "The EPA has reviewed the information provided and address all the elements associating with the incident, based on these information the EPA concluded that no further regulatory actions will be taken in this instance. However the EPA reminds Boral of their obligation to comply with the conditions under the pollution reduction program of its EPL 11815 until these PRP are considered completed by the EPA and removed from this licence."	Compliant
C23 - Pollution of Waters	Any discharge or water quality criteria specified under the EPL must be complied with	Discussion with proponent on discharge events	No controlled discharge permitted	Compliant
C24 - Pollution of Waters	Surface water must only be discharged from the location specified in the EPL	Discussion with proponent on discharge events	No controlled discharge permitted	Compliant
C25 - Pollution of Waters	Discharges of turbidity and/or suspended solids to waters from discharge point identified in condition EPL is only permitted when the discharge occurs solely as a result of rainfall at the premises exceeding a total of 45 millilitres over any consecutive 5-day period	Discussion with proponent on discharge events	No controlled discharge permitted	Compliant
C26 - Pollution of Waters	The Applicant shall undertake water quality monitoring at the discharge point and in accordance with the monitoring requirements described under this consent and the EPL.	Discussion with proponent on discharge events	No discharge events in current audit period	Compliant
C27 - Erosion and Sediment Control	All soil and / or vegetation disturbed or removed from the site shall be disposed of to, or stored at, an appropriate location where it cannot be washed off the site.	Details of storage during construction Site inspection to verify	Boral advises no soil was removed for the purposes of building the haul road was removed. There is no soil accepted at the site. Weed material stored prior to off-site disposal Site inspection verified.	Compliant
C28 - Erosion and Sediment Control	All construction vehicles exiting the site, having had access to unpaved areas, shall depart via a Wheel-wash facility.	Site inspection to verify CEMP	CEMP Southern Perimeter Haul Road Upgrade Version 3 dated 27/10/2017 sighted, section 7.2 refers to erosion and sediment control including statement that: "All construction vehicles exiting the site having had access to unsealed areas are to exit via the southern wheel wash" All vehicles leaving the site pass through one of two wheel washes	Compliant
C29 - Erosion and Sediment Control	The Applicant shall implement erosion and sediment control measures during construction in accordance with Landcom's Managing Urban Stormwater: Soils and Construction guideline.	Site inspection to verify CEMP	CEMP Southern Perimeter Haul Road Upgrade Version 3 dated 27/10/2017 sighted, section 7.2 refers to erosion and sediment control including statement that: "The following erosion and sediment control measures consistent with the "Managing Urban Stormwater: Soils and Construction" Volume 1 (Blue Book) 4th Edition (Landcom 2006) will be implemented at the site." Construction was completed when onsite and the entire road was bunded with concrete blocks	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
C30 - Bunding	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded storage areas in accordance with the requirements of all relevant Australian Standards and the EPA's Storing and Handling Liquids: Environmental Protection - Participants Manual 2007	Site inspection to verify CEMP	OEMP v3 dated 7 May 2018 (EIMM) sighted. Section 5.6.5 refers to refuelling stating: "A designated bunded area for fuel storage and transfer appropriately sign posted is provided" Chemicals stored in flammable liquids cabinet in workshop, primary fuel in bunded and covered tank, secondary fuel in self bunded container, oils and greases in self bunded container. A spill bund has been built at the location where vehicles refuel Site inspection to verify	Compliant
C31 Site Drainage and Surface Water Management	Within six months of the expanded operations, the Applicant shall provide certification from a suitably qualified engineer that the internal surfaces of the surface water detention basins have been maintained to the equivalent to, or better than, a clay liner with a permeability of 1 x 10 ⁻⁹ ms ⁻¹ or less and a thickness of no less than 900 mm and whether any repairs are necessary. The documentation of the certification shall be provided to the EPA ;and Secretary.	Certification of liners Evidence of EPA and secretary submission	Noted, not triggered as expanded operations have not commenced yet. To discuss with the EPA as the condition has been superseded with the upgrade basins.	Not Triggered
C32 Site Drainage and Surface Water Management	Should the certification as per Condition C31 identify that repairs are required, these repairs shall be carried out within two months of the certification.	Applicability	Noted, not triggered as expanded operations have not commenced yet.	Not Triggered
C33 Site Drainage and Surface Water Management	The Applicant shall maintain all surface water infrastructure to direct all surface water runoff to the site's. surface water detention basins.	As noted, and site inspection to verify	Boral has advised that the existing site drainage infrastructure directs all runoff from the facility's 8.6ha water management area to the water management dams. Boral will continue to maintain this infrastructure in good working conditions. Page 325 of SWMP Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted. Section 9 includes details of the proposed surface water monitoring and contingency plans. As per page 8 "Process water is sourced from Dam 2 only. Process water is used for haul road, stockpile and conveyor dust suppression. All water use is within the boundary of the facility Water Management Area." Runoff from the dust suppression sprinklers was observed flowing along the flow paths shown in Appendix A of Surface Water Assessment: Widemere Recycling Facility (2015) . The flows paths and pits were unobstructed and clear of debris. Water was flowing into Basin 1. The level of both basins were quite low, as maintenance is scheduled for Jan21. .	Compliant
C34 Site Drainage and Surface Water Management	Only water contained in the site's secondary surface water detention basin (sediment basin 2 - as identified in Appendix 1) is permitted to be applied to land and stockpiles within the site. Spray from the application of this water must not drift beyond the boundary of the area to which it is applied.	Site inspection to verify	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) sighted. Section 9 includes details of the proposed surface water monitoring and contingency plans. As per page 8 "Boral has advised that the existing site drainage infrastructure directs all runoff from the facility's 8.6ha water management area to the water management dams." Water was being pumped from Basin 2 to the dust suppression sprinklers during the site inspection. No water spray drift was observed.	Compliant
C35 Site Drainage and Surface Water Management	The Applicant shall maintain the surface water detention basins on site with a minimum capacity to contain 45 millilitres of rainfall over any consecutive 5 day period. The capacity requirements of the sediment basins may be modified by the EPL.	Rainfall monitoring Site inspection OEMP	There are 2 water level markers in Basin 2, sighted during inspection, colour coded marker with yellow and red lines. When the water level enters the yellow section it is nearing the limit above which it is unlikely to contain the minimum 45mm rainfall capacity and is pumped to the water tanks. Both basins had low water levels with ample capacity to hold volume Basin 2 is checked daily during pre-start meeting, and recorded monthly (EPP checklist sighted).	Compliant
C36 Site Drainage and Surface Water Management	The Applicant shall ensure that a visible marker is installed in each sediment retention basin in a position that shows the freeboard in the basin that equates to the volume required to contain all rainfall and runoff in the catchment from a 45 millilitre rainfall event over any consecutive 5 day period or as modified by the EPL	Site inspection to verify	As noted in C35 and observed onsite	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
C37 Site Drainage and Surface Water Management	The sediment basin liner shall be monitored every 3 years to ensure a clay finer of permeability of 1 x 10-9 ms-1 or less and a thickness of no less than 900 mm is maintained.	Certification of liner	Condition requires the sediment basin liner to be monitored every 3 years to ensure a clay finer of permeability of 1 x 10-9 ms-1 or less and a thickness of no less than 900 mm is maintained. There was an assessment undertaken for the old line in March 2017. Sighted Pells Sullivan Meynink report dated 17/3/17 and this was the document that identified that the basins needed to be upgraded. Finding was that the liner was not performing to the standard required in this liner and there was a need to remediate. Subsequently the basins have been updated and HDPE liner installed to meet the permeability requirement.	Non-Compliant
C38 - Groundwater	Within six- months of the commencement of the expanded operations. The Applicant shall conduct a Groundwater Monitoring Program. The program must: (a) be carried out by a suitably qualified and experienced expert in consultation with the EPA and to the satisfaction of the Secretary;	Groundwater Monitoring Program Consultation with EPA Satisfaction of the secretary	Groundwater Monitoring Program prepared by EMM (Dated 20 June. 2017 V1) sighted. Consultation with the EPA did not occur during its preparation (sight EPA letter to DPIE dated 3/4/18) The GWP was not approved with the OEMP (DPIE letter dated 25/5/18) Experience and qualifications of person preparing not in document. However, as the expanded operations have not commenced, this condition remains not triggered.	Not Triggered
	Within six- months of the commencement of the expanded operations. The Applicant shall conduct a Groundwater Monitoring Program. The program must: (b) assess the potential for leakage of the sediment basins to groundwater;	Groundwater Monitoring Program	Groundwater Monitoring Program prepared by EMM (Dated 20 June. 2017 V1) sighted. Chapter 3 and Section 5.3 assess the potential leakage of sediments basins into groundwater	Compliant
	Within six- months of the commencement of the expanded operations. The Applicant shall conduct a Groundwater Monitoring Program. The program must: (c) detail baseline data, groundwater levels and quality against the relevant criteria;	Groundwater Monitoring Program	Groundwater Monitoring Program prepared by EMM (Dated 20 June. 2017 V1) sighted. Appendix A includes detail baseline data, Section 5.2 includes groundwater levels and quality against the relevant criteria; EPA has raised concerns (letter dated 20/4/18). These are yet to be addressed by Boral.	Not Triggered
	Within six- months of the commencement of the expanded operations. The Applicant shall conduct a Groundwater Monitoring Program. The program must: (d) provide mitigation and contingency measures to prevent the sediment basins from leaking; and	Groundwater Monitoring Program; data; measures	Groundwater Monitoring Program prepared by EMM (Dated 20 June. 2017 V1) sighted. As per section 6.2 expanded operations monitoring: "The ongoing monitoring will be used to identify potential leakage from the sediment basins into the groundwater and to inform appropriate management and mitigation responses". EPA has raised concerns (letter dated 20/4/18). These are yet to be addressed by Boral.	Not Triggered
	Within six- months of the commencement of the expanded operations. The Applicant shall conduct a Groundwater Monitoring Program. The program must: (e) identify further groundwater monitoring if required.	Groundwater Monitoring Program	Groundwater Monitoring Program prepared by EMM (Dated 20 June. 2017 V1) sighted. Section 6 refers to Recommendations for ongoing monitoring. EPA has raised concerns (letter dated 20/4/18). These are yet to be addressed by Boral.	Not Triggered
C39 - Groundwater	Within three months of the completion of the Groundwater Monitoring Program, the Applicant shall submit a copy of the Groundwater Monitoring Program as identified in Condition C38 to the Secretary and the EPA	Groundwater Monitoring Program Correspondence with DPIE and consultation with EPA	Groundwater Monitoring Program prepared by EMM (Dated 20 June. 2017 V1) sighted. Section 7 outlines the requirement to submit to secretary and EPA during extended operations which have not yet commenced Document submitted to DPIE and EPA was not approved, this was on 7/5/18, which was >3months after GMP was prepared. EPA has raised concerns (letter dated 20/4/18). These are yet to be addressed by Boral.	Not Triggered
C40 - Groundwater	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Groundwater Monitoring Program.	Correspondence between DPIE and proponent.	Not triggered as expanded operations have not commenced yet.	Not Triggered
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (a) be prepared by a suitably qualified and experienced expert;	Water Mitigation and Monitoring Plan Qualification of person	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted. Qualifications and experience not included as part of plan however author is known to auditor and he's considered qualified.	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
C41 - Surface Water Mitigation and Monitoring Plan	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (b) be approved by the Secretary in consultation with the EPA;	Water Mitigation and Monitoring Plan Correspondence with Secretary and consultation with EPA	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted. Letter from Greg Johnson (Boral) to Melissa Ward (EPA) dated 28 April 2017 providing SWMMP for review No response from EPA sighted. Document submitted to DPIE on 7/5/18, and referred to EPA, however was not approved. EPA has raised concerns (letter dated 20/4/18). These are yet to be addressed by Boral.	Not Triggered
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (c) provide a description and map of the surface water processes and surface water management infrastructure;	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted. The existing surface water management system is described in Section 3.1 and a map is included as Figure 5 page 15.	Compliant
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (d) outline the measures to control and manage surface water (including erosion and sedimentation) associated with the Development;	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted. The existing surface water management system is described in Section 3.1 and a map is included as Figure 5 page 15. Sediment Storage and water storage included in Figure 4. Doesn't discuss erosion. However, EPA advised that updated measures based on the Draft WQ Risk Assessment & Proposed Sampling Plan (10/8/17) be included (Sighted EPA letter dated 3/4/18). The SWMMP has not yet been updated to reflect these	Not Triggered
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (e) detail how water used for dust depression will be managed to ensure excessive run-off is not generated at the site;	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted. The water balance model calibration that is documented in Section 5 considered the potential for some applied process water to return to the water management system.	Compliant
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (f) consider the human health risks associated with the surface water reuse process at the site;	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted. Section 6.3 page 48 consider Human Health Risks	Compliant
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (g) include details of the maintenance procedures of the sediment basins and surface water infrastructure;	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted A maintenance plan for the basins is provided in Section 9.	Compliant
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (h) describe the procedures for maintaining vegetation along surface water channels and detention systems, to minimise the potential for erosion;	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Nothing pertaining to the management of vegetation onsite to reduce erosion Subsequently a Draft WQ Risk Assessment & Proposed Sampling Plan (Royal Haskoning DHV, 10/8/17) was prepared. (Sighted EPA letter dated 3/4/18). The SWMMP has not yet been updated to include this information or measures arising from implementing works as per EPA requirements.	Not Triggered
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (i) provide details and outcomes of the water balance review and water quality characterisation as required by the EPL;	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B). Section 6.2 applies the water balance results and the outcomes of the SWCA to establish potential water quality risks to receiving waters.	Compliant
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (j) identify and justify practical measures that could be deployed at the site to minimise water pollution;	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B). Section 7 reviews potential mitigation measures and selects and justifies a preferred suite of water management improvement works. Section 8 provides an implementation schedule for the proposed works program.	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (k) identify preferred mitigation measures along with timeframes for implementation;	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B). Section 7 reviews potential mitigation measures and selects and justifies a preferred suite of water management improvement works. Section 8 provides an implementation schedule for the proposed works program. However, EPA advised that updated measures based on the Draft WQ Risk Assessment & Proposed Sampling Plan (10/8/17) be included (Sighted EPA letter dated 3/4/18). The SWMMP has not yet been updated to reflect these	Not Triggered
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (l) establish an ongoing runoff discharge monitoring program to validate the proposed mitigation measures;	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B). A surface water monitoring program is detailed in Section 9. This program addresses each of the monitoring requirements listed in EPL Condition U1.7e). Subsequently a Draft WQ Risk Assessment & Proposed Sampling Plan (Royal Haskoning DHV, 10/8/17) was prepared. (Sighted EPA letter dated 3/4/18). The SWMMP has not yet been updated to include this information.	Not Triggered
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (m) identify measures for managing pollutant exceedances;	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B). Section 7 reviews potential mitigation measures and selects and justifies a preferred suite of water management improvement works. Subsequently a Draft WQ Risk Assessment & Proposed Sampling Plan (Royal Haskoning DHV, 10/8/17) was prepared. (Sighted EPA letter dated 3/4/18). The SWMMP has not yet been updated to include this information or measures arising from implementing works as per EPA requirements.	Not Triggered
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (n) identify contingency options to account for any mitigation measures that do not adequately address the site water pollution risks;	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B). Contingency options are provided in Section 9. Subsequently a Draft WQ Risk Assessment & Proposed Sampling Plan (Royal Haskoning DHV, 10/8/17) was prepared. (Sighted EPA letter dated 3/4/18). The SWMMP has not yet been updated to include this information or measures arising from implementing works as per EPA requirements.	Not Triggered
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (o) include a review and justify the flocculants and coagulants used on-site; and	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B). Section 3.2.3 page 18 details use of flocculating agents onsite; Table 2.2 says Flocculating agents are applied to outflows from the truck wheel wash. Inflows into Dam 2 also spill over a rack of flocculating blocks. Boral use the Damclear flocculent which has been previously endorsed by the EPA.	Compliant
	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must: (p) conduct a review of the methods and chemicals used for pH adjustment in sediment basin.	Water Mitigation and Monitoring Plan	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B). Section 3.2.3 page 18 details use pH adjusting chemical use onsite, but does not review or justify in any detail? No mention of detailed methods used. Table 2.2 says it will be reviewed when the dam upgrade is investigated. However, plan not finalised with further requirements and updates identified by the EPA (Sighted EPA letter dated 3/4/18).	Not Triggered
C42 - Surface Water Mitigation and Monitoring Plan	The Applicant shall carry out the Development in accordance with the Surface Water Mitigation and Monitoring Plan (including the implementation of mitigation measures) approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary	Correspondence between DPIE, EPA and proponent.	Document submitted to DPIE on 7/5/18, and referred to EPA, however was not approved. EPA has raised concerns (letter dated 20/4/18). These are yet to be addressed by Boral. EPA also required that the proposed new water management system, including the proposed increased storage be implemented immediately. In a letter from EMM dated 17 June 2020 : <i>"Since the commencement of the PRP in November , Boral have modified the facility's water management system and site practices to reduce risks and impacts to downstream receiving waters. The primary management objective of these initiatives has been to reduce the frequency and magnitude of overflows. This has been achieved by increasing both stormwater capture capacity and onsite water use during wet weather periods."</i>	Not Triggered
	Within three months of implementing the Surface Water Mitigation and Monitoring Plan, the Applicant shall provide a Surface Water Validation Report, which shall; (a) be carried out by a suitably qualified and experienced expert;	Correspondence between DPIE, EPA and proponent.	Surface Water Validation Report has not been prepared, pending approval of SWMMP. page 2 of SWMMP advises <i>These documents will be prepared following the implementation of any approved changes to the facility's water management system. These documents will be informed by water quality and level data and will assess the effectiveness of the implemented surface water management system in complying with development consent and EPL conditions</i>	Not Triggered

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
C43 - Water Quality Validation	Within three months of implementing the Surface Water Mitigation and Monitoring Plan, the Applicant shall provide a Surface Water Validation Report, which shall; (b) be approved by the Secretary in consultation with the EPA;	Correspondence between DPIE, EPA and proponent.	Surface Water Validation Report has not been prepared, pending approval of SWMMP	Not Triggered
	Within three months of implementing the Surface Water Mitigation and Monitoring Plan, the Applicant shall provide a Surface Water Validation Report, which shall; (c) detail the results of the Surface Water Mitigation and Monitoring Plan;	Correspondence between DPIE, EPA and proponent.	Surface Water Validation Report has not been prepared, pending approval of SWMMP	Not Triggered
	Within three months of implementing the Surface Water Mitigation and Monitoring Plan, the Applicant shall provide a Surface Water Validation Report, which shall; (d) provide a characterisation of the water quality discharged in accordance with ANZECC (2000) assessment criteria;	Correspondence between DPIE, EPA and proponent.	Surface Water Validation Report has not been prepared, pending approval of SWMMP	Not Triggered
	Within three months of implementing the Surface Water Mitigation and Monitoring Plan, the Applicant shall provide a Surface Water Validation Report, which shall; (e) ensure surface water is being managed in accordance the EPL;	Correspondence between DPIE, EPA and proponent.	Surface Water Validation Report has not been prepared, pending approval of SWMMP	Not Triggered
	Within three months of implementing the Surface Water Mitigation and Monitoring Plan, the Applicant shall provide a Surface Water Validation Report, which shall; (f) provide an assessment of the effectiveness of implemented mitigation measures;	Correspondence between DPIE, EPA and proponent.	Surface Water Validation Report has not been prepared, pending approval of SWMMP	Not Triggered
	Within three months of implementing the Surface Water Mitigation and Monitoring Plan, the Applicant shall provide a Surface Water Validation Report, which shall; (g) confirm that the site water balance including validation of the sediment pond storage and predicted discharge volume is consistent with the potential pollutant risks;	Correspondence between DPIE, EPA and proponent.	Surface Water Validation Report has not been prepared, pending approval of SWMMP	Not Triggered
	Within three months of implementing the Surface Water Mitigation and Monitoring Plan, the Applicant shall provide a Surface Water Validation Report, which shall; (h) if necessary, propose additional mitigation measures to control and/or treat all pollutants that represent a risk of non-trivial harm; and	Correspondence between DPIE, EPA and proponent.	Surface Water Validation Report has not been prepared, pending approval of SWMMP	Not Triggered
	Within three months of implementing the Surface Water Mitigation and Monitoring Plan, the Applicant shall provide a Surface Water Validation Report, which shall; (i) update the Surface Water Mitigation and Monitoring Plan to reflect any changes to the surface water management system.	Correspondence between DPIE, EPA and proponent.	Surface Water Validation Report has not been prepared, pending approval of SWMMP	Not Triggered
C44 - Water Quality Validation	Any alterations to the surface water management system identified in the Surface Water Validation Report must be implemented prior to any further controlled discharges to the satisfaction of the Secretary.	Correspondence between DPIE, EPA and proponent.	Surface Water Validation Report has not been prepared, pending approval of SWMMP	Not Triggered
C45 - Water Quality Validation	The Applicant must comply with any amended water quality criteria and discharge limits identified in the EPL.	Correspondence between DPIE, EPA and proponent.	Surface Water Validation Report has not been prepared, pending approval of SWMMP	Not Triggered
C46 - Surface Water Audit	The Applicant shall carry out an independent Surface Water Audit of the Development, in consultation with the EPA, following completion of the Surface Water Validation Report or as directed by the Secretary. The audit must: (a) be carried out by a suitably qualified and experienced expert whose appointment has been endorsed by the Secretary;	Correspondence between DPIE, EPA and proponent.	page 2 of SWMMP advises <i>These documents will be prepared following the implementation of any approved changes to the facility's water management system. These documents will be informed by water quality and level data and will assess the effectiveness of the implemented surface water management system in complying with development consent and EPL conditions</i>	Not Triggered
	The Applicant shall carry out an independent Surface Water Audit of the Development, in consultation with the EPA, following completion of the Surface Water Validation Report or as directed by the Secretary. The audit must: (b) audit the Development whilst it is in operation;	Correspondence between DPIE, EPA and proponent.	Surface Water Audit of the Development has not been required yet, pending approval of SWMMP and subsequent actions being completed.	Not Triggered
	The Applicant shall carry out an independent Surface Water Audit of the Development, in consultation with the EPA, following completion of the Surface Water Validation Report or as directed by the Secretary. The audit must: (c) validate the development against the Surface Water Mitigation and Monitoring Plan;	Correspondence between DPIE, EPA and proponent.	Surface Water Audit of the Development has not been required yet, pending approval of SWMMP and subsequent actions being completed.	Not Triggered
	The Applicant shall carry out an independent Surface Water Audit of the Development, in consultation with the EPA, following completion of the Surface Water Validation Report or as directed by the Secretary. The audit must: (d) include a summary of any EPL water quality exceedances;	Correspondence between DPIE, EPA and proponent.	Surface Water Audit of the Development has not been required yet, pending approval of SWMMP and subsequent actions being completed.	Not Triggered

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
	The Applicant shall carry out an independent Surface Water Audit of the Development, in consultation with the EPA, following completion of the Surface Water Validation Report or as directed by the Secretary. The audit must: (e) review design and management practices of the Development against industry best practice for surface water;	Correspondence between DPIE, EPA and proponent.	Surface Water Audit of the Development has not been required yet, pending approval of SWMMP and subsequent actions being completed.	Not Triggered
	The Applicant shall carry out an independent Surface Water Audit of the Development, in consultation with the EPA, following completion of the Surface Water Validation Report or as directed by the Secretary. The audit must: (f) include an action plan that identifies and prioritises additional surface water mitigation measures and/or treatment options that may be necessary to reduce surface water impacts; and	Correspondence between DPIE, EPA and proponent.	Surface Water Audit of the Development has not been required yet, pending approval of SWMMP and subsequent actions being completed.	Not Triggered
	The Applicant shall carry out an independent Surface Water Audit of the Development, in consultation with the EPA, following completion of the Surface Water Validation Report or as directed by the Secretary. The audit must: (g) provide a further program of monitoring to address water quality issues that may emerge over time	Correspondence between DPIE, EPA and proponent.	Surface Water Audit of the Development has not been required yet, pending approval of SWMMP and subsequent actions being completed.	Not Triggered
C47 - Surface Water Audit	Within three months of commissioning this audit, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	Evidence of submission to Secretary	Surface Water Audit of the Development has not been required yet, pending approval of SWMMP and subsequent actions being completed.	Not Triggered
C48 - Surface Water Audit	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Surface Water Audit.	Applicability	Surface Water Audit of the Development has not been required yet, pending approval of SWMMP and subsequent actions being completed.	Not Triggered
CONTAMINATION				
C49 - Contamination	Prior to the commencement of construction of the realigned haul road as identified in Appendix 1, the Applicant shall prepare an Unexpected finds protocol to ensure that potentially contaminated material is appropriately managed. Any material identified as contaminated shall be disposed offsite, with the disposal location and results of testing submitted to the Secretary, prior to its removal from the site.	Unexpected finds protocol Contamination testing Evidence of submission to secretary and approval by same Disposal records	CEMP Southern Perimeter Haul Road Upgrade Version 3 dated 27/10/2017 sighted, Section 7.4 refers to contaminated soil/spoil unexpected finds protocol No evidence that CEMP was approved - Email to Kelly McNicol (DPIE) from Kate Jackson dated 27 October 2017 sighted detailing: As per Condition D1b) of SSD 6525, Boral is required to prepare a CEMP to the satisfaction of the "Secretary". To this end, could you please review (or forward to the appropriate contact within the Department) and let me know if you have any comments" No evidence to suggest that there was a response from DPIE nor that the CEMP was approved by secretary. Based on the CEMP, the testing is the aspect that needs approval by the secretary Completion of road was Dec 2019 so should have occurred prior to then. No further action required	Non-Compliant
C50 - Contamination	The Applicant shall implement the unexpected finds protocol developed under Condition C49 for the duration of construction works	Unexpected finds protocol	CEMP Southern Perimeter Haul Road Upgrade Version 3 dated 27/10/2017 sighted, Section 7.4 refers to contaminated soil/spoil unexpected finds protocol. ENVIRONMENTAL AWARENESS TRAINING Quarry Operations Toolbox Presentation sighted includes basic information on Aboriginal heritage finds protocol Protocol not in place prior to or during construction works No further action required	Non-Compliant
TRAFFIC AND PARKING				
C51 - Parking	The Applicant shall maintain provision for 37 car parking spaces on the site. The spaces must conform to the relevant specifications in the latest version of Australian Standard 2890.1	Site inspection to verify	There are 39 parking spaces at the site. The last audit checked and the spaces exceed the dimension in Figure 2.2 of the Australian Standard for user class 1 (employee) vehicles.	Compliant
C52 - Parking	Accessible, visitor and service vehicle parking spaces must be clearly signposted and designated in accordance with the relevant Australian Standards	Site inspection to verify	Signs were observed showing visitor and disabled parking spaces and areas. Service vehicles park adjacent to plant and equipment requiring maintenance	Compliant
	The Applicant shall ensure that: (a) the Development does not result in any vehicles parking or queuing on the public road network;	Site inspection to verify	No vehicles were observed queuing on public roads and no complaints have been received regarding vehicle queuing.	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
C53 - Operating Conditions	The Applicant shall ensure that: (b) the realigned haul road (as identified in Appendix 1) is constructed and maintained in accordance with the relevant Australian Standards;	Design plans, quarry standards	Haul roads do not have a haul road standard. relevant Australian Standards n/a as non-existent for haul roads. Boral has a quarry standard (Oct19), There is also a QUA-MAN-003 Haul Road Design Construction and Maintenance. These are the guides used for the construction and ongoing maintenance. The maintenance requirements listed are then picked up in the EPP and checklists. Internal haul road realignment plan, Internal haul road realignment section, Internal haul road realignment selected cross sections prepared by Mepsted and associates dated 15/04/2020 sighted	Compliant
	The Applicant shall ensure that: (c) all vehicles are wholly contained on site before being required to stop;	Site inspection to verify OEMP Staff induction/training records	There is approximately 160m between the public road and weighbridge, which is several truck lengths and ample room for stopped vehicles to be wholly contained on site. Site inspection verified Induction records sighted during site inspection - see C1	Compliant
	The Applicant shall ensure that: (d) all loading and unloading of heavy vehicles is carried out on-site, in particular, all materials when first received at the site shall be unloaded at the receivals area in the north of the site as identified in Appendix 1;	Site inspection to verify OEMP Staff induction/training records	OEMP dated May 2018 sighted, section 5.6.1 refers to Traffic management onsite including that: "all loading and unloading of heavy vehicles is carried out on-site, in particular, all materials when first received at the site shall be unloaded at the receivals area in the north of the site" Site inspection verified Induction records sighted during site inspection - see C1. Sighted driver induction sign off for this and the 2020 induction. Shows map of entry and exit points. Site layout then directs trucks to relevant locations All loading and unloading of heavy vehicles was observed to carried out on-site	Compliant
	The Applicant shall ensure that: (e) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times;	Site inspection to verify OEMP Staff induction/training records	OEMP dated May 2018 sighted, section 5.6.1 refers to Traffic management onsite including that: "the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times" Site inspection verified no obstacles to turning were observed in the car park. Induction records sighted during site inspection - see C1 and Sighted driver induction sign off for this and the i2020 induction.	Compliant
	The Applicant shall ensure that: (f) all heavy vehicles associated with the Development have their loads covered and do not track dirt onto public roads;	Site inspection to verify OEMP Staff induction/training records	OEMP dated May 2018 sighted, section 5.6.1 refers to Traffic management onsite including that: "all heavy vehicles associated with the Development have their loads covered and do not track dirt onto public roads" Site inspection verified no obstacles to turning were observed in the car park. Induction records sighted during site inspection - see C1 and Sighted driver induction sign off for this and the 2020 induction which covers passing through wheel wash.	Compliant
	The Applicant shall ensure that: (g) all vehicles enter and leave the site in a forward direction; and	Site inspection to verify OEMP Staff induction/training records	OEMP dated May 2018 sighted, section 5.6.1 refers to Traffic management onsite including that: "all vehicles enter and leave the site in a forward direction" Verified during the site inspection that traffic flow is such that traffic is pushed in and out in a forward direction	Compliant
	The Applicant shall ensure that: (h) all vehicles exiting the site, that have accessed unpaved areas, shall depart via a wheel wash facility.	Site inspection to verify OEMP Staff induction/training records	OEMP dated May 2018 sighted, section 5.6.1 refers to Traffic management onsite including that: "all vehicles exiting the site, that have accessed unpaved areas, shall depart via a wheel wash facility" Induction records sighted during site inspection - see C1 and Sighted driver induction sign off for this and the 2020 induction which covers passing through wheel wash.	Compliant
C54 - Driver Code of Conduct	The Applicant shall implement a Driver Code of Conduct for heavy vehicle drivers associated with the Development. The code must (a) be submitted to and approved by the Secretary within 3 months of the commencement of the expanded operations;	Driver Code of Conduct	OEMP dated May 2018 sighted. Transport code of contact referenced in section 5.6.1 traffic. Not be triggered as expanded operations have not yet commenced	Not Triggered
	The Applicant shall implement a Driver Code of Conduct for heavy vehicle drivers associated with the Development. The code must (b) be distributed to all the drivers of heavy vehicles associated with the Development; and	Staff inductions	OEMP dated May 2018 sighted. Transport code of contact reference in section 5.6.1 traffic states: "drivers are provided with hard copy of site's transport handbook" Not be triggered as expanded operations have not yet commenced	Not Triggered

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
	The Applicant shall implement a Driver Code of Conduct for heavy vehicle drivers associated with the Development. The code must (c) include provisions relating to: (i) the approved haul routes; (ii) the operating conditions; (iii) the maintenance of engine noise and pollution control equipment; and (iv) driving practices the minimise noise emissions on potentially affected residences.	Driver Code of Conduct Staff induction/training records	Not be triggered as expanded operations have not yet commenced	Not Triggered
HERITAGE				
C55 - Heritage	The Applicant shall cease all works on site in the event that any Aboriginal cultural object(s) or human remains are uncovered onsite. The NSW Police, the Aboriginal Community and the OEH are to be notified. Works shall not resume in the designated area until consent in writing from the NSW Police and/or the OEH has been obtained.	CEMP OEMP were there any finds onsite?	OEMP dated May 2018 sighted. Section 5.6.2 Aboriginal and Historic Heritage outlines that " in the event that any aboriginal cultural objects or human remains are uncovered on site all works on site are to be ceased. The NSW Police, the Aboriginal Community and the OEH are to be notified. Works shall not resume in the designated area until consent in writing from the NSW Police and/or the OEH has been obtained" CEMP V3 dated 27/10/2017 prepared by Boral sighted. Section 7.6 pertains to heritage and states: "in the event that any Aboriginal cultural object(s) or human remains are uncovered onsite. The NSW Police, the Aboriginal Community and the Office of Environment and Heritage will be notified. The areas with the artefact or remains are to be protected and shall not resume in the designated area until consent in writing from the NSW Police and/or the OEH has been obtained."	Compliant
VISUAL AMENITY				
C56 - Lighting	All external lighting associated with the Development shall be mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadways. The lighting shall be the minimum level of illumination necessary and shall comply with Australian Standard AS4282 1997 - Control of the Obtrusive Effects of Outdoor Lighting	Site inspection to verify	Site inspection observed there are no sensitive residential receivers near the site, with nearest residence over 1km to the east. Flood lighting used to illuminate areas towards the east of the site is directed downwards and into the site. There is substantial vegetation screening and earth bunding on the eastern side of the site, which shields Prospect Highway and residences from lighting.	Compliant
C57 - Signage	The Applicant shall not install any advertising signs on site without the written consent of the Secretary.	Site inspection to verify	Site inspection verified no presence of any advertising signs onsite	Compliant
FLORA AND FAUNA				
	The Applicant shall: (a) avoid clearing the Swamp Oak Floodplain Forest EEC (with the exception of the 12 juvenile Swamp Oaks identified in the EIS) at the southern end of the site and ensure this stand is protected and maintained during construction and operation of the Development;	Site inspection to verify	Casuarina trees are maintained along the south-eastern boundary and shrubs are maintained on a bund on the north-eastern boundary of the site. These plants and bund prevent views to the facility from the east except at the entrance. Landscape contractor is being engaged to do weed control. This is to control weeds around the carpark (October 2020). In Sept 2022 was within the site, maintaining fence line, garden beds and paths. Sighted Nov 20 report, which moved into the area along the haul road and around the dams and cleared weeds. A second Oct set of photos showed internal maintenance. In Dec20, photos showing the presence of lantana, there is also privet. Maintaining to edge of site within the Cumberland EEC. Protrade is the company that is doing this work.	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
C58 - Flora and Fauna	The Applicant shall: (b) implement suitable measures to manage and prevent the spread of notifiable weeds on site as defined in the Noxious Weeds Act 1993; and	OEMP Reports for bush regenerator services	According to Widemere Recycling 2019 Annual review: "Regular weed control is conducted by an external contractor" Landscape contractor is being engaged to do weed control. This is to control weeds around the carpark (October 2020). In Sept 2022 was within the site, maintaining fence line, garden beds and paths. Sighted Nov 20 report, which moved into the area along the haul road and around the dams and cleared weeds. A second Oct set of photos showed internal maintenance. In Dec20, photos showing the presence of lantana, there is also privet. Maintaining to edge of site within the Cumberland EEC. Protrade is the company that is doing this work.	Compliant
	The Applicant shall: (c) ensure landscaping along the eastern boundary of the site is maintained throughout the life of the Development.	Site inspection to verify Reports for Landscape works	According to Widemere Recycling 2019 Annual review: "Landscaping along the site boundaries are regularly managed by external landscaping contractors" Landscape contractor is being engaged to do weed control. This is to control weeds around the carpark (October 2020). In Sept 2022 was within the site, maintaining fence line, garden beds and paths. Sighted Nov 20 report, which moved into the area along the haul road and around the dams and cleared weeds. A second Oct set of photos showed internal maintenance.	Compliant
SECURITY				
C59 - Security	The Applicant shall: (a) install and maintain a perimeter fence and security gates on the site; and	Site inspection to verify	Site inspection to verify The auditor observed that the facility is surrounded by security fences and that there are padlocked gates at the entry and exit points. The work order for inspection was also sighted	Compliant
	The Applicant shall: (b) ensure that the security gates on site are locked whenever the site is unattended.	Site inspection to verify Interview with staff	Site inspection to verify The auditor observed that the facility is surrounded by security fences and that there are padlocked gates at the entry and exit points. The work order for inspection was also sighted	Compliant
HAZARDS AND RISK				
C60 - Hazards and Risk	The quantities of dangerous goods stored and handled at the site shall be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines - Applying SEPP 33 at all times.	Details of dangerous goods stored and handled; Evidence on quantities to show how these are maintained below the SEPP 33 requirements	Boral advises that dangerous goods on site do not meet SEPP 33 requirements as per Figure 9: Class 3PGII and 3PGIII Flammable Liquids, diesel storage is not near any sensitive receivers or otherwise and is not of sufficient quantity. The quantity of fuel stored is 10000, and Boral advises that they are below the threshold quantities; auditor also undertook interpretation is that the materials onsite are not potentially hazardous and as such there are no setbacks applicable.	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT				
D1 - Construction Environmental Management Plan	The Applicant shall implement a Construction Environmental Management Plan during construction work for the Development. The Plan must: (a) be prepared by a suitably qualified and experienced expert;	CEMP Qualifications of expert	Widemere Southern Perimeter Haul Road Upgrade Construction Environmental Management Plan prepared by Greg Johnson dated 27/10/2017 (v3) sighted. Greg Johnson CV (dated 29 January 2019) sighted, he has a Master of Environmental Engineering Management and has relevant experience	Compliant
	The Applicant shall implement a Construction Environmental Management Plan during construction work for the Development. The Plan must: (b) be submitted to and approved by the Secretary prior to the commencement of construction;	CEMP Approval and submission to Secretary	Widemere Southern Perimeter Haul Road Upgrade Construction Environmental Management Plan prepared by Greg Johnson dated 27/10/2017 (v3) sighted. Email to Kelly McNicol (DPIE) from Kate Jackson dated 27 October 2017 sighted detailing: <i>As per Condition D1b) of SSD 6525, Boral is required to prepare a CEMP to the satisfaction of the "Secretary. To this end, could you please review (or forward to the appropriate contact within the Department) and let me know if you have any comments"</i> Emma Barnet (DPIE) responded to Kate Jackson (email 1/11/17) with some further requirements regarding a number of items. No evidence to suggest that there was a response back to DPIE nor that the CEMP was approved by secretary Completion of road was Dec 2019 so should have occurred prior to then. No further action required	Non-Compliant
	The Applicant shall implement a Construction Environmental Management Plan during construction work for the Development. The Plan must: (c) details of erosion, sediment and pollution control measures and practices to be implemented during construction of the realigned haul road (as identified in Appendix 1);	CEMP	Widemere Southern Perimeter Haul Road Upgrade Construction Environmental Management Plan prepared by Greg Johnson dated 27/10/2017 (v3) sighted. Section 7.2 page 13 refers to erosion and sediment control measures stating: "erosion and sediment control measures consistent with the "Managing Urban Stormwater: Soils and Construction" Volume 1 (Blue Book) 4th Edition (Landcom 2006) will be implemented at the site	Compliant
	The Applicant shall implement a Construction Environmental Management Plan during construction work for the Development. The Plan must: (d) describe all activities to be undertaken on the site during construction an outline all management practises and procedures;	CEMP	Widemere Southern Perimeter Haul Road Upgrade Construction Environmental Management Plan prepared by Greg Johnson dated 27/10/2017 (v3) sighted. Section 1.2 refers to scope of works and expected plant associated with the project. Section 4 refers to management procedures including for plant and staff training and awareness and section 6 & 7 includes environmental monitoring and measurement	Compliant
	The Applicant shall implement a Construction Environmental Management Plan during construction work for the Development. The Plan must: (e) identify the statutory approvals that apply to the development;	CEMP	Widemere Southern Perimeter Haul Road Upgrade Construction Environmental Management Plan prepared by Greg Johnson dated 27/10/2017 (v3) sighted. Section 3.2 outlines the statutory framework for the development.	Compliant
	The Applicant shall implement a Construction Environmental Management Plan during construction work for the Development. The Plan must: (f) describe of the roles and responsibilities for all relevant employees involved in construction; and	CEMP	Widemere Southern Perimeter Haul Road Upgrade Construction Environmental Management Plan prepared by Greg Johnson dated 27/10/2017 (v3) sighted. Nothing pertaining to roles and responsibility for all relevant employees involved in construction. No further action required	Non-Compliant
	The Applicant shall implement a Construction Environmental Management Plan during construction work for the Development. The Plan must: (g) include arrangements for complaints handling procedures during construction.	CEMP	Widemere Southern Perimeter Haul Road Upgrade Construction Environmental Management Plan prepared by Greg Johnson dated 27/10/2017 (v3) sighted. Section 6.4 page 11 includes environmental incident and complaints notification procedures	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
D2 - Operational Environmental Management Plan	The Applicant shall implement an Operational Environmental Management Plan for the Development. This plan must: (a) be prepared by a suitably qualified and experienced expert;	OEMP Qualifications of expert	OEMP V8 (dated 7 May 2018) sighted. Prepared by Lawrence Wells of EMM who is an Environmental Scientist	Compliant
	The Applicant shall implement an Operational Environmental Management Plan for the Development. This plan must: (b) be submitted to and approved by the Secretary prior to the commencement of the expanded operations;	OEMP Correspondence between Boral and DPIE Update of current status of OEMP	OEMP V8 (dated 7 May 2018) sighted. Letter from Chris Ritchie dated 28/05/2018 sighted. States that OEMP has been reviewed and satisfactorily meets the requirements D4 (b); however this is subject to a number of additional requirements. (see letter titled "180528 Boral Widemere OEMP Approval - SSD 6525 (1).pdf) Noted that expanded operations have not yet commenced, so this is not finalised	Not Triggered
	The Applicant shall implement an Operational Environmental Management Plan for the Development. This plan must: (c) provide a strategic framework for environmental management of the Development;	OEMP	OEMP V8 (dated 7 May 2018) sighted. Chapter 3 page 7 outlines strategic framework for environmental management	Compliant
	The Applicant shall implement an Operational Environmental Management Plan for the Development. This plan must: (d) identify the statutory approvals that apply to the Development;	OEMP	OEMP V8 (dated 7 May 2018) sighted. Chapter 2 page 5 outlines Regulatory requirements Chapter 3 page 7 outlines statutory requirements for development	Compliant
	The Applicant shall implement an Operational Environmental Management Plan for the Development. This plan must: (e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;	OEMP	OEMP V8 (dated 7 May 2018) sighted Chapter 4 and section 8.2. Table 4.1 outlines the role, responsibility and authority of personnel including state manager, site manager, regional environmental manager etc.	Compliant
	The Applicant shall implement an Operational Environmental Management Plan for the Development. This plan must: (f) detail the commissioning period, including surface water monitoring and the deployment of mitigation measures;	OEMP	OEMP V8 (dated 7 May 2018) sighted chapter 5 beginning page 13 outlines environmental performance monitoring periods, performance criteria and mitigation measures for Noise and Vibration, Air quality, Groundwater, Surface water, Waste management, and other environmental measures. Section 5.4 of Chapter 5 pertains to Surface water, states should commence 3months following commission	Compliant
	The Applicant shall implement an Operational Environmental Management Plan for the Development. This plan must: (g) describe in general how the environmental performance of the Development would be monitored and managed;	OEMP	OEMP V8 (dated 7 May 2018) sighted chapter 5 beginning page 13 outlines environmental performance monitoring periods, performance criteria and mitigation measures for Noise and Vibration, Air quality, Groundwater, Surface water, Waste management, and other environmental measures.	Compliant
	The Applicant shall implement an Operational Environmental Management Plan for the Development. This plan must: (h) include the relevant plans listed in Schedule C;	OEMP	All plans included in Schedule C included as Appendices to OEMP A Waste monitoring program B Noise management plan C Dust management plan D Groundwater monitoring program Surface water mitigation and monitoring plan	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
	The Applicant shall implement an Operational Environmental Management Plan for the Development. This plan must: (i) include a process for ongoing review and update of the OEMP (including documenting any changes to the development, surface water manage system and mitigation measures identified In the surface water mitigation and monitoring plan and any audits);	OEMP Correspondence between Boral and DPIE and EPA Update of current status of OEMP	OEMP V8 (dated 7 May 2018) sighted Section 9.2 page 49 of OEMP outlines the monitoring and review of OEMP. Should be undertaken at a minimum every three years and review three months after submission of annual review, incident report, an audit or modification of consent. Appendix E Surface Water Mitigation and Monitoring Plan prepared by Royal Haskoning DHV Version B dated 28/04/2017 sighted. Section 9 page 59 Boral are waiting on response from EPA on Surface Water Management measures, before updating OEMP surface water management section.	Not Triggered
	The Applicant shall implement an Operational Environmental Management Plan for the Development. This plan must: (j) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; and (v) respond to emergencies.	OEMP	OEMP V8 (dated 7 May 2018) sighted. Chapter 6 includes communication and consultation (page 35), reporting (page 35), complaints and dispute resolution procedure (page 36), and non-compliance (page 37). Chapter 8 Emergency response 9page 43) includes: notification, emergency roles and responsibilities, emergency response policy, procedure, and evacuation.	Compliant
	The Applicant shall ensure that the environmental management plans required under this consent are prepared in accordance with any relevant guidelines and include: (a) detailed baseline data;	OEMP - current status	WMP includes baseline data in section 4.1 (EMM dated 5 April 2018, V2) NMP includes ambient noise baseline data in Section 2 and Appendix C (EMM dated 22 February 2018, V2) Groundwater Monitoring Program baseline data included chapter 5 page 6 and Appendix A (EMM dated 20 June, 2017, V1) Dust Management Plan does not contain detailed baseline monitoring, it does contain site dust monitoring page 12 table 3-1 dating from 2012 to 2017. The DMP is based off a 4/g/m2/moth criteria as the EPL doesn't outline any amount (Rambol Environ V2 dated 30/01/2018). However, not raised as an issue by EPA or DPIE in their review therefore would indicate this is considered acceptable. Surface Water Monitoring and Mitigation Plan Water Balance Model Development And Calibration includes extensive rainfall, runoff, water balance, and calibration data(RHDPV, Victory Engineering revision B 28/04/2017) EPA has identified that further baseline monitoring is required to be added the SWMMP plan. Boral are waiting on response from EPA on Surface Water Management measures, before updating OEMP surface water management section.	Not Triggered

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
D3 - Management Plan Requirements	The Applicant shall ensure that the environmental management plans required under this consent are prepared in accordance with any relevant guidelines and include: (b) a description of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures/criteria; (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures; (iv) the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	OEMP - current status	The OEMP was submitted to DPE in December 2017. DPE responded on 19/01/2018 and requested further work on the OEMP to ensure it complies with Condition D3, specifically the waste monitoring program (C1(a)), noise management plan (C10(c, g, i)), dust management plan (C17(g), D3(a)), groundwater monitoring program (C38(b, d)) and surface water mitigation and monitoring plan (C41(b, f, h, p)). The OEMP is being amended accordingly.	Not Triggered
	The Applicant shall ensure that the environmental management plans required under this consent are prepared in accordance with any relevant guidelines and include: (c) a program to monitor and report on the: (i) impacts and environmental performance of the Development; (ii) effectiveness of any management measures; (iii) a contingency plan to manage any unpredicted impacts and their consequences; (iv) a program to investigate and implement ways to improve the environmental performance of the Development over time;	OEMP	OEMP dated May 2018 sighted. Section 5.1.4, 5.2.4, 5.3.4, 5.4.4, 5.5.4, and 5.5.2 refer to monitoring environmental performance EPA has identified that further monitoring is required to be added the SWMMP plan. Boral are waiting on response from EPA on Surface Water Management measures, before updating OEMP surface water management section.	Not Triggered
	The Applicant shall ensure that the environmental management plans required under this consent are prepared in accordance with any relevant guidelines and include: (d) a protocol for managing and reporting any: (i) incidents; (ii) complaints; (iii) non-compliances with statutory requirements; and (iv) exceedances of the impact assessment criteria and/or performance criteria; and (v) a protocol for periodic review of the plan.	OEMP GRP - HSEQ - 3 -01 Monitoring and Review	OEMP dated May 2018 sighted. i) Section 7.2-7.9 includes protocol relating to incidents (ii) Section 6.3 includes complaints and dispute procedure (iii) section 6.4 non-compliance including non-compliance trigger table 6.1 page 37 (iv) section 6.4 non-compliance including exceedance trigger table 6.1 page 37 DPIE and EPA correspondence relating to the approval of the OEMP and subplans did not raise any issues regarding these protocols.	Compliant
D4 - Management Plan Requirements	The Secretary may waive some of the requirements In Condition D3 If they are unnecessary or unwarranted for particular management plans	Have any requirements been waived/requested to be waived?	Boral has not requested that any requirements be waived.	Not Triggered
REPORTING				

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
D5 - Incident Reporting	The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the Development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident and such further reports as may be requested.	Correspondence between Boral and EPA; Incident report.	Incident Report to EPA dated 10 August 2020 sighted and pertaining to Widemere Recycling Facility (EPL 11815) – Stormwater Discharge Incident which stated: "This report has been prepared in response to the event self-reported by Boral Resource (NSW) Pty Ltd (Boral) on Monday 27-Jul-2020 regarding discharge from the Boral Widemere Recycling site located at 38 Widemere Rd WETHERILL PARK NSW 2164 (the Site) during a sustained wet weather event. This report has been prepared in accordance with the EPA request for Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020. " Email Response from Rashad Danoun of EPA dated 10 November 2020 sighted which states: "The EPA has reviewed the information provided and address all the elements associating with the incident, based on these information the EPA concluded that no further regulatory actions will be taken in this instance. However the EPA reminds Boral of their obligation to comply with the conditions under the pollution reduction program of its EPL 11815 until these PRP are considered completed by the EPA and removed from this licence." No notification provided to the Secretary; however this was interpreted by Boral as being a n/c with the EPL rather than an incident that would cause material harm.	Compliant
D6 - Regular Reporting	The Applicant shall provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent	Website reporting Plans and programs on website annual reviews for previous years	OEMP dated May 2018 sighted. Section 6.2 page 35 refers to reporting requirements: "The site reports on its environmental performance annually in accordance with the EPL11815 and development consent SSD 6225" Annual review prepared for development in line with condition D9. Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 sighted (dated January 2020) available on project website. Annual Review dating 2016 - 2018 also available on website.	Compliant
INDEPENDENT ENVIRONMENTAL AUDIT				
	Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must: (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;	This audit by Molino Stewart	Shireen Baguley is suitably experience and qualified Exemplar global Certified Lead Environmental Auditor (Licence number 125758). DPIE in a letter dated 27 October 2020 approved the following audit team 1. Shireen Baguley, lead auditor 2. Steven Molino, alternate lead auditor 3. Rebecca O'Rourke, assistant auditor 4. Jenni Kremer, alternate assistant auditor	Compliant
	Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must: (b) led by a suitably qualified auditor, and include experts in fields specified by the Secretary;	This audit by Molino Stewart DPIE endorsement letter dated 27 October 2020	Shireen Baguley is suitably experience and qualified Exemplar global Certified Lead Environmental Auditor (Licence number 125758). DPIE in a letter dated 27 October 2020 approved the following audit team 1. Shireen Baguley, lead auditor 2. Steven Molino, alternate lead auditor 3. Rebecca O'Rourke, assistant auditor 4. Jenni Kremer, alternate assistant auditor	Compliant


Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
D7 - Independent Environmental Audit	Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must: (c) include consultation with the relevant agencies;	This audit by Molino Stewart	Shireen Baguley undertook consultation with the following agencies on 10/11/2020 Susan Fox (Planning Office), Department of Planning and Environment Maria Divis (Compliance and Investigations), Department of Planning and Environment Dolores Schembri (Coordinator, Environmental Management), Fairfield City Council Rashad Danoun - Operations Officer, Regulatory Operations Metropolitan West. Environmental Protection Authority (EPA)	Compliant
	Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must: (d) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under these approvals);	This audit by Molino Stewart	This audit has been commissioned as required by the condition. The first audit and was commissioned on 25/11/2017, which is within one year of the consent. This is the second audit commissioned for the site and is within the three years from commissioning. The environmental performance and adequacy of strategies, plans and programs is assessed in this table and attached report.	Compliant
	Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must: (e) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and	This audit by Molino Stewart	This audit has been commissioned as required by the condition. The first audit and was commissioned on 25/11/2017, which is within one year of the consent. This is the second audit commissioned for the site and is within the three years from commissioning. The environmental performance and adequacy of strategies, plans and programs is assessed in this table and attached report.	Compliant
	Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must: (f) recommend measures or actions to Improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.	This audit by Molino Stewart	This audit has been commissioned as required by the condition. The first audit was commissioned on 25/11/2017, which is within one year of the consent. This is the second audit commissioned for the site and is within the three years from commissioning. The environmental performance and adequacy of strategies, plans and programs is assessed in this table and attached report.	Compliant
D8 - Independent Environmental Audit	Within three months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report	Noted, not yet triggered	Noted, not yet triggered	Not Triggered

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
D9 - Annual Review	<p>Within one year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the Development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year;</p>	<p>Annual Review Secretary approval/satisfaction</p>	<p>Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 sighted (dated January 2020) and 25 November 2017 - 24 November 2018 (dated January 2019). Sighted DPIE acceptance for latter (dated 1/4/19). Sighted DPIE acceptance for latter (dated 1/4/19) and (dated 30/04/2020). Which both state: "The Department considers that the Report generally satisfies the reporting requirements of the Consent"</p> <p>Details for latest were: Section 2 page 7 outlines development carried out in 2018-2019 including upgrading sediment dams to greater capacity, installation of wedge pit, sprinklers for dust suppression, and use of Environmental Permit Planner Proposed developments for 2019-2020 outlined on page 9 include "complete installation of truck washing bay and monitor current control methods and where necessary update and modify existing controls"</p>	Compliant
	<p>Within one year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review must:</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of these results against the:</p> <p>(i) the relevant statutory requirements, limits or performance measures/criteria;</p> <p>(ii) requirements of any plan or program required under this consent;</p> <p>(iii) the monitoring results of previous years; and</p> <p>(iv) the relevant predictions ,n the EIS;</p>	<p>Additional Annual Reviews Secretary approval/satisfaction</p>	<p>Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 sighted (dated January 2020) and 25 November 2017 - 24 November 2018 (dated January 2019). Sighted DPIE acceptance for latter (dated 1/4/19) and (dated 30/04/2020). Which both state: "The Department considers that the Report generally satisfies the reporting requirements of the Consent"</p> <p>Details for latest were:</p> <p>(i) the relevant statutory requirements, limits or performance measures/criteria are outlined in section 3.1 to 3.1.9 for materials management, dust management, storm water management, noise management, visual controls, traffic management, site security, refuelling, and waste disposal</p> <p>(ii) requirements of any plan or program required under this consent monitoring requirements are outlined in section 3.2 to 3.2.7</p> <p>(iii) the monitoring results of previous years; Monitoring data trends from previous years included in section 7 page 48</p> <p>(iv) the relevant predictions ,n the EIS; section 5 includes comparisons of impacts and performance against EIS predictions</p>	Compliant
	<p>Within one year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review must:</p> <p>(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p>	<p>Additional Annual Reviews Secretary approval/satisfaction</p>	<p>Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 sighted (dated January 2020) and 25 November 2017 - 24 November 2018 (dated January 2019). Sighted DPIE acceptance for latter (dated 1/4/19) and (dated 30/04/2020). Which both state: "The Department considers that the Report generally satisfies the reporting requirements of the Consent"</p> <p>Section 6 outlines details when performance goals not achieved (non-compliance) and Section 8 Environmental Management targets and strategies for the following 12 months outlines measures to improve/rectify</p>	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
	<p>Within one year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review must:</p> <p>(d) identify any trends in the monitoring data over the life of the Development</p>	Additional Annual Reviews secretary approval/satisfaction	<p>Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 sighted (dated January 2020) and 25 November 2017 - 24 November 2018 (dated January 2019). Sighted DPIE acceptance for latter (dated 1/4/19) and (dated 30/04/2020). Which both state: "The Department considers that the Report generally satisfies the reporting requirements of the Consent"</p> <p>Section 7 Monitoring Data Trends page 48 outlines the trends over the life of the development for instance between 2003 and 2019 for dust monitoring data</p>	Compliant
	<p>Within one year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review must:</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and</p>	Additional Annual Reviews secretary approval/satisfaction	<p>Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 sighted (dated January 2020) and 25 November 2017 - 24 November 2018 (dated January 2019). Sighted DPIE acceptance for latter (dated 1/4/19) and (dated 30/04/2020). Which both state: "The Department considers that the Report generally satisfies the reporting requirements of the Consent"</p> <p>Section 5 table 6 includes Comparison of impacts and performance against EIS predictions and includes analysis of discrepancies e.g. for dust . Section 6 outlines details when performance goals not achieved (non-compliance) and Section 8 Environmental Management targets and strategies for the following 12 months outlines measures to improve/rectify</p>	Compliant
	<p>Within one year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review must:</p> <p>(f) describe what measures will be implemented over the next year to improve the environmental performance of the Development.</p>	Additional Annual Reviews secretary approval/satisfaction	<p>Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 sighted (dated January 2020) and 25 November 2017 - 24 November 2018 (dated January 2019). Sighted DPIE acceptance for latter (dated 1/4/19) and (dated 30/04/2020). Which both state: "The Department considers that the Report generally satisfies the reporting requirements of the Consent"</p> <p>Section 6 outlines details when performance goals not achieved (non-compliance) and Section 8 Environmental Management targets and strategies for the following 12 months outlines measures to improve/rectify</p>	Compliant
	<p>Within three months of the submission of an:</p> <p>(a) annual review under Condition D9 above;</p>	revision of plans in line with condition OEMP etc.	<p>OEMP and subplans have been reviewed within three months of the annual review dated Jan 2018, Jan 2019 and January 2020.</p> <p>P41: consider having the review schedule incorporated into the OEMP</p>	Compliant

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
D10 - Revision of Strategies, Plans and Programs	Within three months of the submission of an: (b) incident report under Condition D5 above;	revision of plans in line with condition Agency correspondence, incident reports	Incident Report to EPA dated 10 August 2020 sighted and pertaining to Widemere Recycling Facility (EPL 11815) – Stormwater Discharge Incident which stated: "This report has been prepared in response to the event self-reported by Boral Resource (NSW) Pty Ltd (Boral) on Monday 27-Jul-2020 regarding discharge from the Boral Widemere Recycling site located at 38 Widemere Rd WETHERILL PARK NSW 2164 (the Site) during a sustained wet weather event. This report has been prepared in accordance with the EPA request for Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020." The SWMMMP has been undergoing ongoing review in relation to items raised by DPIE/EPA in the consultation regarding the original submission. The latest information is now with the EPA pending approval (sighted EMM Memorandum dated 17/6/20 - Summarising correspondence numbers that are complete and require completing; EPA correspondence dated 10/11/20).	Compliant
	Within three months of the submission of an: (c) audit under Condition D7 above; or	Agency correspondence, incident reports revision of plans in line with condition OEMP etc.	Audit addenda and audit prepared for the site dated June 2018. OEMP was approved 28 May 2018 by DPIE; the OEMP and all subplans were not revised within three months as the OEMP which was approved captured the outcomes of the audit while it was progressing.	Compliant
	Within three months of the submission of an: (d) any modification to this consent, the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary. <i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.</i>	Agency correspondence, incident reports revision of plans in line with condition OEMP etc.	Consent Modification 1 issued 10 October 2017, however submission was made by Christopher Colusson 26 July 2017. OEMP and all sub plans were reviewed within three months of approval submission.	Compliant
D11 - Revision of Strategies, Plans and Programs	The Applicant shall ensure that the operation of the Development is undertaken in accordance with all relevant updated and/or amended strategies, management plans and programs approved by the Secretary (or as revised and approved by the Secretary), unless otherwise agreed by the Secretary.	revision of plans in line with condition OEMP etc.	Plans have not been updated within timeframes outlined in D10. However the expanded operations have not commenced and will not commence during the timeframe of this audit.	Not Triggered

Condition Number	Requirement	Evidence Used	Findings and Recommendations	Compliance Status
D12 - Access to Information	<p>The Applicant shall:</p> <p>(a) make copies of the following publicly available on its website:</p> <p>(i) the documents referred to in Condition D2;</p> <p>(ii) all current statutory approvals for the Development;</p> <p>(iii) all approved strategies, plans and programs required under the conditions of this consent;</p> <p>(iv) a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</p> <p>(v) a complaints register, updated on a monthly basis;</p> <p>(vi) minutes of any community meetings held by the Applicant;</p> <p>(vii) the annual reviews of the Development;</p> <p>(viii) any independent environmental audit of the Development, and the Applicant's response to the recommendations in any audit;</p> <p>(ix) any other matter required by the Secretary; and</p> <p>(b) keep this information up to date and to the satisfaction of the Secretary.</p>	<p>Website reporting containing all sub condition items</p> <p>Plans and programs on website</p> <p>Information from Boral</p>	<p>(a)(i) OEMP on website in two parts dated 7 May 2018</p> <p>(ii) Statutory approvals: Development Consent SSD 6525 is on the website.</p> <p>(iii) Approved strategies, plans and programs required by the consent:</p> <p>-Condition C1: waste monitoring program included in OEMP on website</p> <p>-Condition C38: the groundwater monitoring program included in OEMP on website</p> <p>-Condition C41: the discharge monitoring program included in OEMP on website</p> <p>-Condition D3: the monitoring program/improvement program included in OEMP on website.</p> <p>-See (a)(i) above for OEMP.</p> <p>(iv) The September 2020 monitoring report is on the website, which reports air quality monitoring results, dust. It does not contain water quality monitoring results as there have not been any discharges since 2017.</p> <p>(v) There is a complaints register on the website.</p> <p>(vi) no community meetings held</p> <p>(vii) Annual review 2019 on website</p> <p>(viii) The 2017 independent environmental audit is on the website.</p> <p>(ix) no requests from the secretary</p>	Compliant
	<p>The Applicant shall:</p> <p>(b) keep this information up to date and to the satisfaction of the Secretary.</p>	Website items	Reviewed website and all items in part a) kept on the website.	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status									
ADMINISTRATIVE CONDITONS													
A1 What the licence authorises and regulates													
A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Resource recovery</td><td>Recovery of general waste</td><td>Any general waste recovered</td></tr><tr><td>Waste storage</td><td>Waste storage - other types of waste</td><td>Any other types of waste stored</td></tr></table>	Scheduled Activity	Fee Based Activity	Scale	Resource recovery	Recovery of general waste	Any general waste recovered	Waste storage	Waste storage - other types of waste	Any other types of waste stored	Noted	Noted	Not Triggered
Scheduled Activity	Fee Based Activity	Scale											
Resource recovery	Recovery of general waste	Any general waste recovered											
Waste storage	Waste storage - other types of waste	Any other types of waste stored											
A2 Premises or plant to which this licence applies													
A2.1	<p>The licence applies to the following premises:</p> <table><tr><th>Premises Details</th></tr><tr><td>WIDEMERE RECYCLING</td></tr><tr><td>38 WIDEMERE ROAD</td></tr><tr><td>WETHERILL PARK</td></tr><tr><td>NSW 2164</td></tr><tr><td>LOT 4001 DP 1173524</td></tr></table>	Premises Details	WIDEMERE RECYCLING	38 WIDEMERE ROAD	WETHERILL PARK	NSW 2164	LOT 4001 DP 1173524	Noted	Noted	Not Triggered			
Premises Details													
WIDEMERE RECYCLING													
38 WIDEMERE ROAD													
WETHERILL PARK													
NSW 2164													
LOT 4001 DP 1173524													
A2.2	<p>The premises location is shown on the map below.</p> 	Noted	Noted	Not Triggered									
A3 Information supplied to the EPA													
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	Will be finalised upon final assessment of conditions within this EPL	Works and activities are carried out in accordance with the EPL to the extent outlined in this audit and it is expected that the EPA would issue licence in accordance with the proposal	Compliant									
2 DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND													
P1 - Location of monitoring/discharge points and areas													

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status															
P1.1	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point</p> <table><tr><th colspan="4">Air</th></tr><tr><th>EPA identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>1</td><td>Ambient air monitoring</td><td></td><td>Dust gauge labelled "Ambient Air Monitoring" on map titled "Boral Recycling Plant EPL 11815 Licensed Monitoring Points" dated 11 June 2010</td></tr></table>	Air				EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Ambient air monitoring		Dust gauge labelled "Ambient Air Monitoring" on map titled "Boral Recycling Plant EPL 11815 Licensed Monitoring Points" dated 11 June 2010	<p>Map of locations Verify during site inspection</p>	<p>Dust monitoring sites observed during site inspection and map sighted onsite.</p>	Compliant			
Air																			
EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																
1	Ambient air monitoring		Dust gauge labelled "Ambient Air Monitoring" on map titled "Boral Recycling Plant EPL 11815 Licensed Monitoring Points" dated 11 June 2010																
P1.2	<p>The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.</p> <table><tr><th colspan="4">Water and land</th></tr><tr><th>EPA Identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>2</td><td>Discharge to Waters Discharge Quality Monitoring Volume Monitoring</td><td>Discharge to Waters Discharge Quality Monitoring Volume Monitoring</td><td>Discharge outlet labelled "Stormwater Discharge Point" on map titled "Boral Recycling Plant EPL 11815 Licensed Monitoring Points" dated 11 June 2010</td></tr></table>	Water and land				EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	2	Discharge to Waters Discharge Quality Monitoring Volume Monitoring	Discharge to Waters Discharge Quality Monitoring Volume Monitoring	Discharge outlet labelled "Stormwater Discharge Point" on map titled "Boral Recycling Plant EPL 11815 Licensed Monitoring Points" dated 11 June 2010	<p>Map of locations Verify during site inspection</p>	<p>Discharge to waters map sighted, no monitoring there at present as no discharges permitted</p>	Compliant			
Water and land																			
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																
2	Discharge to Waters Discharge Quality Monitoring Volume Monitoring	Discharge to Waters Discharge Quality Monitoring Volume Monitoring	Discharge outlet labelled "Stormwater Discharge Point" on map titled "Boral Recycling Plant EPL 11815 Licensed Monitoring Points" dated 11 June 2010																
P1.3	<p>The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.</p> <table><tr><th colspan="3">Noise/Weather</th></tr><tr><th>EPA identification no.</th><th>Type of monitoring point</th><th>Location description</th></tr><tr><td>3</td><td>Noise monitoring</td><td>Munro Street Greystanes</td></tr><tr><td>4</td><td>Noise monitoring</td><td>Southern Greystanes Estate Residential Lands</td></tr><tr><td>5</td><td>Noise monitoring</td><td>Daruga Avenue, Nelsons Ridge</td></tr></table>	Noise/Weather			EPA identification no.	Type of monitoring point	Location description	3	Noise monitoring	Munro Street Greystanes	4	Noise monitoring	Southern Greystanes Estate Residential Lands	5	Noise monitoring	Daruga Avenue, Nelsons Ridge	<p>Map of locations Verify during site inspection</p>	<p>Noise monitoring only takes place for a short period, and monitoring done in May/June; not underway at present/.</p>	Compliant
Noise/Weather																			
EPA identification no.	Type of monitoring point	Location description																	
3	Noise monitoring	Munro Street Greystanes																	
4	Noise monitoring	Southern Greystanes Estate Residential Lands																	
5	Noise monitoring	Daruga Avenue, Nelsons Ridge																	
3 LIMIT CONDITIONS																			
L1 Pollution of waters																			
L1.1	<p>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997</p>	<p>Correspondence with EPA concerning discharge event July 2020 arising from large rain events</p>	<p>Incident Report to EPA dated 10 August 2020 sighted and pertaining to Widemere Recycling Facility (EPL 11815) – Stormwater Discharge Incident which stated: "This report has been prepared in response to the event self-reported by Boral Resource (NSW) Pty Ltd (Boral) on Monday 27-Jul-2020 regarding discharge from the Boral Widemere Recycling site located at 38 Widemere Rd WETHERILL PARK NSW 2164 (the Site) during a sustained wet weather event. This report has been prepared in accordance with the EPA request for Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020." Email Response from Rashad Danoun of EPA dated 10 November 2020 sighted which states: "The EPA has reviewed the information provided and address all the elements associating with the incident, based on these information the EPA concluded that no further regulatory actions will be taken in this instance. However the EPA reminds Boral of their obligation to comply with the conditions under the pollution reduction program of its EPL 11815 until these PRP are considered completed by the EPA and removed from this licence."</p>	Compliant															

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
L1.2	<p>Discharge of waters from Point 2 is permitted when the discharge occurs solely as a result of rainfall at the premises exceeding a total of 45 millimetres over any consecutive five day period (subject to Condition U1).</p> <p><i>Note: A controlled point source discharge is a discharge where the:</i></p> <ul style="list-style-type: none"> • <i>discharge point location can be specifically identified and clearly defined;</i> • <i>licensee has control over the frequency, volume and pollutant concentrations of the discharge; and</i> • <i>EPA can reasonably expect that with proper and efficient management practices the licensee can comply with volume and pollutant concentration limits at all times.</i> 	<p>Reports, correspondence between Boral and EPA</p>	<p>Incident Report to EPA dated 10 August 2020 sighted and pertaining to Widemere Recycling Facility (EPL 11815) – Stormwater Discharge Incident which stated: "This report has been prepared in response to the event self-reported by Boral Resource (NSW) Pty Ltd (Boral) on Monday 27-Jul-2020 regarding discharge from the Boral Widemere Recycling site located at 38 Widemere Rd WETHERILL PARK NSW 2164 (the Site) during a sustained wet weather event. This report has been prepared in accordance with the EPA request for Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020."</p> <p>Email Response from Rashad Danoun of EPA dated 10 November 2020 sighted which states: "The EPA has reviewed the information provided and address all the elements associating with the incident, based on these information the EPA concluded that no further regulatory actions will be taken in this instance. However the EPA reminds Boral of their obligation to comply with the conditions under the pollution reduction program of its EPL 11815 until these PRP are considered completed by the EPA and removed from this licence."</p>	Compliant
L2 Concentration limits				
L2.1	<p>For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.</p>	<p>Reports, correspondence between Boral and EPA</p>	<p>There were uncontrolled overflows at Monitoring Point 2 due to stormwater inflows exceeding the basin's design capacity.</p> <p>the SWDCA has been drafted and submitted to EPA and</p> <p>"In summary, no point sources of pollution have been identified and the concrete washout within the incoming and processed material stockpiles has been identified as the primary source of high pH, and elevated nitrogen and metal concentrations in stormwater runoff"</p>	Not Triggered

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status																														
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Reports, correspondence between Boral and EPA	There were uncontrolled overflows at Monitoring Point 2 due to stormwater inflows exceeding the basin's design capacity. the SWDCA has been drafted and submitted to EPA and "In summary, no point sources of pollution have been identified and the concrete washout within the incoming and processed material stockpiles has been identified as the primary source of high pH, and elevated nitrogen and metal concentrations in stormwater runoff"	Not Triggered																														
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table/s.	Reports, correspondence between Boral and EPA	Noted; No controlled discharge permitted and no other potential water pollutants have been released.	Compliant																														
L2.4	Water and/or Land Concentration Limits POINT 2 <table><tr><th>Pollutant</th><th>Units of Measure</th><th>50 percentile concentration limit</th><th>90 percentile concentration limit</th><th>3DGM concentration limit</th><th>100 percentile concentration limit</th></tr><tr><td>Oil and Grease</td><td>milligrams per litre</td><td></td><td></td><td></td><td>10</td></tr><tr><td>pH</td><td>pH</td><td></td><td></td><td></td><td>6.5-8.5</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>50</td></tr><tr><td>Turbidity</td><td>nephelometric turbidity units</td><td></td><td></td><td></td><td>150</td></tr></table>	Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	Oil and Grease	milligrams per litre				10	pH	pH				6.5-8.5	Total suspended solids	milligrams per litre				50	Turbidity	nephelometric turbidity units				150	N/A	Noted	
Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit																													
Oil and Grease	milligrams per litre				10																													
pH	pH				6.5-8.5																													
Total suspended solids	milligrams per litre				50																													
Turbidity	nephelometric turbidity units				150																													
L3 Volume and mass limits																																		
L3.1	For each discharge point or utilisation area specified below (by a point number), the volume/mass of: a) liquids discharged to water; or; b) solids or liquids applied to the area; must not exceed the volume/mass limit specified for that discharge point or area <table><tr><th>Point</th><th>Unit of Measure</th><th>Volume/Mass Limit</th></tr><tr><td>2</td><td>kilolitres per day</td><td>100</td></tr></table>	Point	Unit of Measure	Volume/Mass Limit	2	kilolitres per day	100	N/A	Noted																									
Point	Unit of Measure	Volume/Mass Limit																																
2	kilolitres per day	100																																
L4 Waste																																		

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status																																																																	
L4.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below. This condition does not limit any other conditions in this licence.</p> <table border="1"> <thead> <tr> <th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr> </thead> <tbody> <tr> <td>NA</td><td>Building and demolition waste</td><td>As defined in Boral engineered glass sand resource recovery exemption 2020</td><td>Resource recovery Waste storage</td><td></td></tr> <tr> <td>NA</td><td>Building and demolition waste</td><td>As defined in Boral engineered glass sand resource recovery order 2020</td><td>Resource recovery Waste storage</td><td></td></tr> <tr> <td>NA</td><td>Waste concrete slurry from the company's concrete batching plants</td><td>Wet concrete batching plant stirrer waste</td><td>Resource recovery Waste storage</td><td>NA</td></tr> <tr> <td>NA</td><td>Concrete, bricks and roof tiles</td><td>Tiles and masonry, including seconds materials direct from manufacturer</td><td>Resource recovery Waste storage</td><td>NA</td></tr> <tr> <td>NA</td><td>Excavated natural material</td><td></td><td>Resource recovery Waste storage</td><td>NA</td></tr> <tr> <td>NA</td><td>Building and demolition waste</td><td>As defined in Schedule 1 of the POEO Act, in force from time to time.</td><td>Resource recovery Waste storage</td><td>NA</td></tr> <tr> <td>NA</td><td>Asphalt waste (including asphalt resulting from road construction and waterproofing works)</td><td></td><td>Resource recovery Waste storage</td><td>NA</td></tr> <tr> <td>NA</td><td>Virgin excavated natural material</td><td>As defined in Schedule 1 of the POEO Act, in force from time to time.</td><td>Resource recovery Waste storage</td><td>NA</td></tr> <tr> <td>NA</td><td>Plasterboard and ceramics</td><td></td><td>Resource recovery Waste storage</td><td>NA</td></tr> <tr> <td>NA</td><td>Cured concrete waste from a batch plant</td><td></td><td>Resource recovery Waste storage</td><td>NA</td></tr> <tr> <td>NA</td><td>Soils</td><td></td><td>Resource recovery Waste storage</td><td>Arsenic 40mg/kg; Cadmium 2mg/kg; Copper 200mg/kg; Mercury 1.5mg/kg; Zinc 600mg/kg; Petroleum Hydrocarbons C6-C9 150mg/kg; Petroleum Hydrocarbons C10-C36 1600mg/kg; Polycyclic aromatic hydrocarbons 80mg/kg; Polychlorinated biphenyls (individual) 1mg/kg. No Acid Sulfate Soil or Potential Acid Sulfate Soil is to be received at the Premises. Soil thresholds will be subject to review from time to time.</td></tr> <tr> <td>NA</td><td>Garden waste</td><td>As defined in Schedule 1 of the POEO Act, in force from time to time.</td><td>Resource recovery Waste storage</td><td>Not more than 1,000 tonnes stockpiled onsite at any one time.</td></tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	NA	Building and demolition waste	As defined in Boral engineered glass sand resource recovery exemption 2020	Resource recovery Waste storage		NA	Building and demolition waste	As defined in Boral engineered glass sand resource recovery order 2020	Resource recovery Waste storage		NA	Waste concrete slurry from the company's concrete batching plants	Wet concrete batching plant stirrer waste	Resource recovery Waste storage	NA	NA	Concrete, bricks and roof tiles	Tiles and masonry, including seconds materials direct from manufacturer	Resource recovery Waste storage	NA	NA	Excavated natural material		Resource recovery Waste storage	NA	NA	Building and demolition waste	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	NA	NA	Asphalt waste (including asphalt resulting from road construction and waterproofing works)		Resource recovery Waste storage	NA	NA	Virgin excavated natural material	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	NA	NA	Plasterboard and ceramics		Resource recovery Waste storage	NA	NA	Cured concrete waste from a batch plant		Resource recovery Waste storage	NA	NA	Soils		Resource recovery Waste storage	Arsenic 40mg/kg; Cadmium 2mg/kg; Copper 200mg/kg; Mercury 1.5mg/kg; Zinc 600mg/kg; Petroleum Hydrocarbons C6-C9 150mg/kg; Petroleum Hydrocarbons C10-C36 1600mg/kg; Polycyclic aromatic hydrocarbons 80mg/kg; Polychlorinated biphenyls (individual) 1mg/kg. No Acid Sulfate Soil or Potential Acid Sulfate Soil is to be received at the Premises. Soil thresholds will be subject to review from time to time.	NA	Garden waste	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	Not more than 1,000 tonnes stockpiled onsite at any one time.	<p>Waste records</p> <p>EPA Annual Returns</p> <p>OEMP</p>	<p>Annual returns 26-11-2017 to: 25-11-2018 and 26-11-2018 to: 25-11-2019 sighted nothing pertaining to waste accepted at premises</p> <p>WARP monthly reports sighted dating November 2019 to November 2020. All waste types documented in line with the activities and descriptions outlined in condition with the majority of waste pertaining to construction waste</p> <p>Boral provided evidence of QRS data, and docketing system during site inspection.</p> <p>Sighted the QRS all codes in this are all waste accepted and recycled and processed on site. The codes are linked to all the waste that can be accepted onsite. If there's no code, no docket can be provided on the site and the data in QRS comes straight through from the site.</p> <p>No non-permitted waste sighted onsite.</p>	Compliant
Code	Waste	Description	Activity	Other Limits																																																																	
NA	Building and demolition waste	As defined in Boral engineered glass sand resource recovery exemption 2020	Resource recovery Waste storage																																																																		
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Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
L4.2	The authorised amount of waste permitted on the premises cannot exceed 750,000 tonnes at any one time, unless approved in writing by the EPA.	Waste records Annual Returns OEMP	Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (dated January 2020) sighted. According to table 5 "The site has processed 639,396 tonnes within the current reporting period." WARP monthly reports sighted dating November 2019 to November 2020 has not exceeded the limit outlined in condition Boral provided evidence of QRS data and docketing system during site inspection. 135,911 as at 14/12/20 as shown in the WARRP records.	Compliant
L4.3	The Licensee must not receive on the Premises, more than 1,000,000 tonnes of waste per year	Waste records Annual Returns OEMP	Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (dated January 2020) sighted. According to table 5 "The site has processed 639,396 tonnes within the current reporting period." WARP monthly reports sighted dating November 2019 to November 2020 has not exceeded the limit outlined in condition	Compliant
L4.4	The height of any stockpile of any material on the Premises, must not exceed twenty (20) metres above ground level.	Interviews Site inspection to verify OEMP	OEMP (dated May 2018) appendix L One point lesson Stockpile Heights training for staff Boral advises stockpiles are measured against plant (height of a 19m high onsite silo) and this is in EPP. The month and person inspecting the stockpiles are recorded to confirm height. 6 monthly fly over conducted. Stockpile height checklist sighted during site inspection	Compliant
L4.5	No asbestos waste is to be accepted or stored at the premises.	Waste records Interviews Any asbestos detected? Received?	OEMP (dated May 2018). Section 9 training and review includes reference to Asbestos awareness training for all employees. Waste Monitoring Program dated 5 April 2018 (prepared by EMM, V2) includes details of waste monitoring and tracking including waste receipt and handling suspected contaminated material section 4.2.3, and chapter 7 training review Boral advises that if fibrous materials are encountered then Hibbs Consulting are contacted to remove material and undertake testing It is noted that in the EPA correspondence to DPIE (letter dated 3/4/18), that a new stockpile sampling plan was being developed and was to be included in the WMP. It was at that time not submitted to the EPA and no evidence this has yet occurred. Boral advises it has been working with NSW EPA (via WMRR) to develop an industry procedures for managing unexpected finds and this consultation is continuing. When the procedure has been developed Boral will incorporate the same into our WMP. In the meantime, we manage unexpected finds on a case by case basis engaging with HIBBS & Assoc where necessary and NSW EPA.	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status																																																												
L4.6	The licensee must have in place and implement procedures to identify and prevent the acceptance of any waste not permitted by condition L4.1 at the premises.	OEMP Waste records Staff Inductions annual returns for EPA Interviews	OEMP (dated May 2018). Section 9 training and review includes reference to Asbestos awareness training for all employees Boral advises that if fibrous materials are encountered then Hibbs Consulting are contacted to remove material and undertake testing It is noted that in the EPA correspondence to DPIE (letter dated 3/4/18), that a new stockpile sampling plan was being developed and was to be included in the WMP. It was at that time not submitted to the EPA and no evidence this has yet occurred. Boral advises it has been working with NSW EPA (via WMRR) to develop an industry procedures for managing unexpected finds and this consultation is continuing. IWhen the procedure has been developed Boral will incorporate the same into our WMP. In the meantime, we manage unexpected finds on a case by case basis engaging with HIBBS & Assoc where necessary and NSW EPA..	Compliant																																																												
L5 Noise limits																																																																
L5.1	Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2. POINT 3 <table><tr><th>Time period</th><th>Measurement parameter</th><th>Measurement frequency</th><th>Noise level dB(A)</th></tr><tr><td>Day</td><td>Day-LAeq (15 minute)</td><td>n/a</td><td>39</td></tr><tr><td>Evening</td><td>Evening-LAeq (15 minute)</td><td>n/a</td><td>38</td></tr><tr><td>Morning-Shoulder</td><td>Morning-Shoulder-LAeq(15 minute) (8am-7am Mon.-Sat. & 8am-8am Sun & Public Holidays)</td><td>n/a</td><td>39</td></tr></table> POINT 3,4,5 <table><tr><th>Time period</th><th>Measurement parameter</th><th>Measurement frequency</th><th>Noise level dB(A)</th></tr><tr><td>Night</td><td>Night-LAeq (15 minute)</td><td>n/a</td><td>35</td></tr><tr><td>Night</td><td>LAFmax</td><td>n/a</td><td>60</td></tr></table> POINT 4 <table><tr><th>Time period</th><th>Measurement parameter</th><th>Measurement frequency</th><th>Noise level dB(A)</th></tr><tr><td>Day</td><td>Day-LAeq (15 minute)</td><td>n/a</td><td>39</td></tr><tr><td>Evening</td><td>Evening-LAeq (15 minute)</td><td>n/a</td><td>37</td></tr><tr><td>Morning-Shoulder</td><td>Morning-Shoulder-LAeq(15 minute) (8am-7am Mon.-Sat. & 8am-8am Sun & Public Holidays)</td><td>n/a</td><td>39</td></tr></table> POINT 5 <table><tr><th>Time period</th><th>Measurement parameter</th><th>Measurement frequency</th><th>Noise level dB(A)</th></tr><tr><td>Day</td><td>Day-LAeq (15 minute)</td><td>n/a</td><td>38</td></tr><tr><td>Evening</td><td>Evening-LAeq (15 minute)</td><td>n/a</td><td>35</td></tr><tr><td>Morning-Shoulder</td><td>Morning-Shoulder-LAeq(15 minute) (8am-7am Mon.-Sat. & 8am-8am Sun & Public Holidays)</td><td>n/a</td><td>38</td></tr></table>	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Day	Day-LAeq (15 minute)	n/a	39	Evening	Evening-LAeq (15 minute)	n/a	38	Morning-Shoulder	Morning-Shoulder-LAeq(15 minute) (8am-7am Mon.-Sat. & 8am-8am Sun & Public Holidays)	n/a	39	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Night	Night-LAeq (15 minute)	n/a	35	Night	LAFmax	n/a	60	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Day	Day-LAeq (15 minute)	n/a	39	Evening	Evening-LAeq (15 minute)	n/a	37	Morning-Shoulder	Morning-Shoulder-LAeq(15 minute) (8am-7am Mon.-Sat. & 8am-8am Sun & Public Holidays)	n/a	39	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Day	Day-LAeq (15 minute)	n/a	38	Evening	Evening-LAeq (15 minute)	n/a	35	Morning-Shoulder	Morning-Shoulder-LAeq(15 minute) (8am-7am Mon.-Sat. & 8am-8am Sun & Public Holidays)	n/a	38	Complaints register Noise monitoring data	OEMP (dated May 2018) page 13 Table 5.1 section 5.1.2 Performance Criteria is in line with C6 ES2 Noise and Vibration on page E.1 in OEMP states that "Monitoring will occur within one year of the date of the consent and every three years thereafter as well as in response to complaints regarding noise" There have been no complaints regarding noise according to complaints register on website Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (dated January 2020) sighted. Section 3.2.1 pertains to Noise Monitoring undertaken in May 2019. All monitoring was undertaken with the same method, frequency and measurements as outlined in condition. The operational noise from the site was inaudible during all monitoring periods when the site was operating thus no exceedances were noted.	Compliant
Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																																																													
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L5.2	For the purposes of Condition 5.1: a) Day is defined as the period from 7am to 6pm; b) Evening is defined as the period from 6pm to 10pm; c) Night is defined as the period from 10pm to 12am; and d) Morning shoulder period is a subset of the night period between 6am to 7am.	OEMP Staff Inductions Complaints register	OEMP (dated May 2018) section 5.1 table 5.1 identifies operational noise limits in line with the descriptions in condition L5.2	Compliant																																																												
L5.3	The noise limits set out in condition L5.1 apply under all meteorological conditions except for the following: a) Wind speeds greater than 3 metres/second at 10 metres above ground level. b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or c) Stability category G temperature inversion conditions.	Any of sub-conditions applicable	Noted																																																													

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
L5.4	For the purposes of condition L5.4: a) Data recorded by a meteorological station installed on site must be used to determine meteorological conditions; and b) Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part E4 of Appendix E to the <i>NSW Industrial Noise Policy</i> .	Meteorological station observed during site inspection Meteorological records from station.	OEMP v3 dated May 2018 (EMM) sighted. Section 3.2 refers to Meteorological monitoring. Nothing pertaining to using sigma-theta method, however been no instances where this would have been relevant to apply.	Compliant
L5.5	To determine compliance: a) with the Leq(15 minute) noise limits in condition L5.1, the noise measurement equipment must be located: • approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or • within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable • within approximately 50 metres of the boundary of a National Park or a Nature Reserve b) with the LA1(1 minute) noise limits in condition L5.1, the noise measurement equipment must be located within 1 metre of a dwelling façade. c) with the noise limits in condition L5.1, the noise measurement equipment must be located: • at the most affected point at a location where there is no dwelling at the location; or • at the most affected point within an area at a location prescribed by conditions L5.5(a) or L5.5(b).	Noise monitoring locations included in figure 4.1 page 26 of OEMP	OEMP V3 dated May 2018 (EMM) sighted. Which states under ES2 "Noise monitoring will occur within one year of the date of the consent and every three years thereafter as well as in response to complaints regarding noise" Boral Widemer recycling Annual review (2019) sighted. Table 4.1 includes noise monitoring results dated 18 April 2019. There were no exceedences in the noise levels as outlined in condition L5.1. There have been no complaints regarding noise recorded in this audit period. Noise monitoring locations consistent with the requirements included in figure 4.1 page 26 of OEMP	Compliant
L5.6	A non-compliance of condition L5.1 will still occur where noise generated from the premises in excess of the appropriate limit is measured: • at a location other than an area prescribed by conditions L5.5(a) and L5.5(b); and/or • at a point other than the most affected point at a location.	Noted Noise monitoring records Complaints register	Boral Widemer recycling Annual review (2019) sighted. Table 4.1 includes noise monitoring results dated 18 April 2019. There were no exceedences in the noise levels as outlined in condition L5.1. There have been no complaints regarding noise recorded in this audit period. "Attended noise monitoring observations and results demonstrate that operational noise from the site was inaudible during all monitoring periods when the site was operating"	Compliant
L5.7	For the purposes of determining the noise generated at the premises the NSW Noise Policy for Industry (2017) must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.	Noise monitoring records	Noise Management Plan (EMM, dated 22 February 2018) sighted. Section 4.3 Monitoring Methodology "Noise monitoring shall be conducted as guided by the following standards and guidelines" Which does not include the NSW Noise Policy (2017) but should be updated to include Widemer Recycling Facility EPL noise compliance assessment (EMM, June 2020) sighted states on page 1: "This report presents the results and findings of the attended noise monitoring conducted on 20 May 2020. The following documents were referenced as part of this assessment: Environment Protection Authority (EPA), Noise Policy for Industry (NPI), (2017)"	Compliant
L5.8	The licensee must ensure that all activities are to be undertaken in a manner that will minimise noise and vibration impacts on sensitive receivers	OEMP Site inspection to verify Complaints register	Noise Management Plan (EMM, dated 22 February 2018) sighted. Noise management included as part of section 3.5 page 8 There have been no complaints regarding noise recorded in this audit period. Management of noise as detailed in the IEA schedules	Compliant
L6 Hours of operation				

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
L6.1	All construction work at the premises must only be conducted between 7am and 6pm Monday to Friday inclusive, and between 8:00am and 1:00pm on Saturdays. No construction activity is permitted on a Sunday or a Public Holiday	CEMP Complaints Register Sign in sheets Delivery sheets	CEMP Widemere Southern Perimeter Haul Road Upgrade version 3 dated 27/10/2017 sighted. Section 7.1 outlines construction times in line with relevant conditions (C3). Complaints register sighted, no noise complaints have been registered from the community during out-of-hours periods during this audit period. Widemere Sunday Production Tracker Spreadsheet Sighted no public holidays appear to have been operated on, Several Sundays are recorded including 5 April 2020, 12 July 2020, and 18 October 2020. These were production activities as noted in the IEA schedule limits and not related to construction. Boral advised that the haul road was put in using returned concrete from concrete agitator trucks, and the site gates were closed at 4.30pm each day as a per the norm. As such, the concrete for the road construction was put in place by Boral site operators during these hours and aligned with the delivery of concrete from the agitators trucks.	Compliant
L6.2	Subject to compliance with noise limits in Condition 5.1, operational activities associated with Premises shall only be carried out between the following hours: a) 6:00am and midnight, Monday to Saturday inclusive; b) 6:00am and 6:00pm on one Sunday per month; and c) at no time on public holidays.	OEMP Complaints Register QRS interface	Noise Management Plan (EMM, dated 22 February 2018) sighted. Section 3.3 refers to operational hours in line with condition. There have been no complaints regarding noise recorded in this audit period. Widemere Sunday Production Tracker Spreadsheet Sighted no public holidays appear to have been operated on, Several Sundays are recorded including 5 April 2020, 12 July 2020, and 18 October 2020. These were production activities as noted in the IEA schedule limits and not related to construction. Viewed the QRS system onsite and it shows very clear windows of what is occurring. All work is logged betw 6am and is finished by 10pm, does not run until midnight. No work on Oct 2020 long weekend.	Compliant
L6.3	Notwithstanding Condition 6.2, but subject to compliance with the noise limits in Condition 5.1, ancillary activities on the Premises may be carried out between the following hours: a) 6:00am to midnight Monday to Saturday, inclusive; b) 6:00am and 6:00pm on Sundays; and c) at no time on public holidays. <i>Note: Ancillary Activities means any servicing and/or maintenance of the equipment/machinery associated with the operations, loading and unloading of material onto/from vehicles and stockpiles and the selling of recycled product.</i>	OEMP Complaints Register	Noise Management Plan (EMM, dated 22 February 2018) sighted. Section 3.3 refers to operational hours in line with condition. There have been no complaints regarding noise recorded in this audit period. Widemere Sunday Production Tracker Spreadsheet Sighted no public holidays appear to have been operated on, Several Sundays are recorded including 5 April 2020, 12 July 2020, and 18 October 2020. This was production as per L6.2. No ancillary activities occurred outside the specified times.	Compliant
L6.4	The Licensee must keep a record of all works undertaken on a Sunday	Record of Sunday works	Widemere Sunday Production Tracker Spreadsheet Sighted no public holidays appear to have been operated on, Several Sundays are recorded including 5 April 2020, 12 July 2020, and 18 October 2020	Compliant
L7 Potentially offensive odour				

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
L7.1	No condition of this licence identifies a potentially offensive odour for the purpose of Section 129 of the Protection of the Environment Operations Act 1997. <i>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with conditions of licence directed at minimising odour</i>	Noted	Noted	
L7.2	Any odour generating material is to be removed from the premises within 24 hours of being received.	OEMP Complaints Register Interviews regarding issues with odour generating materials	There have been no complaints regarding odour recorded in this audit period. Boral advises that no odour generating materials accepted on site Any odour generating material would be rejected waste and refused entry to the site. This is documented in the Inspections and Receipts Protocol and integrated into all parts of the operations eg the QRS relies on codes generated by the weighbridge and these relate to the type of waste permitted on the site. If it is not acceptable, then no docket can be raised. All staff are inducted as covered in the IEA schedule C.	Compliant
4 OPERATING CONDITIONS				
O1 Activities must be carried out in a competent manner				
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Staff training records Induction Records OEMP site inspection to verify	OEMP (dated May 2018). Section 9 training and review includes reference to Asbestos awareness training for all employees. Waste Monitoring Program dated 5 April 2018 (prepared by EMM, V2) includes details of waste monitoring and tracking including waste receipt and handling suspected contaminated material section 4.2.3, and chapter 7 training review. Site inspection induction list for everyone on site RAPID, and this has an expiry date entered against each person. Try to do everyone in Jan, and these are valid for one year. Part of this is general enviro awareness and this includes water, dust, noise, chem & fuel storage. and there is also training on inspection and receipts. Sighted presentations, and list of the total inductions which was 134 since Sept20, Driver inductions and runs through speed limits, dust control. HSE inductions in the crew list, and there's an online induction for all Boral employees. Sighted training register showing that this was completed for Domenic Caccamo and Domenico Caccamo, and Ben Cumberland. Everyone has training on and acknowledge of Enviro policy. Sight specific induction W Park; Tipper Fleet induction; HSEQ & Induction Course Boral Product Line Induction - Quarries (eg drilling & blasting, haul roads) There is a skills matrix for staff Learner transcript. Viewed Domenic Caccamo records viewed and this has in there that a wide range of competency in Cerli in surfact extraction operations, has conveyor operations, crushing operation, air quality standards, risk controls, asbestos awareness, VOC, fixed plant crushing and screening, isolation of worker. Peter (FEL operator), sighted wheel loader VOC as well as artic haul truck, loader etc. These are current and required every 3 years.	Compliant
O2 Maintenance of plant and equipment				

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Maintenance records Staff training records Verification of competency documentation OEMP/CEMP	Nothing in OEMP/CEMP Induction/training records as noted in O1.1 Boral has Maximo system which is a electronic asset mangement system and every piece of equipment is assigned a number and under it sits all work orders. All schedules are set up for all equipment. Eg feeder vibrating feed - monthly checks weekly checks and every month has set target. Sighted work order, this is issued by Boral maintenance people. The work order has the condition checks that are required. Fence inspection sighted for 1mth interval. This would be done by onsite staff. If it is a piece of heavy earthworks gear, this would be a licnced contractor and a much more detailed report would be generated which would be sumitted back with the work order. Any followup work is noted and action raised.	Compliant
O3 Dust				
O3.1	All activities conducted on the premises must be undertaken by such practical means to avoid or minimise the generation and emission of air pollutants, including dust.	Site inspeciton to verify OEMP	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 2 identifies mitigation measures to manage dust emission No complaints pertaining to dust recorded within reporting period. However, one occasion a complaint from a passing EPA officer (dated 13/10/2017) was recorded. This was outside the current audit period. OEMP Section 5.2.2 refers to management and mitgation measures including: sprinklers (along roads and areas of high activity), hoses (directed at excavator buckets), speed limits and wheel wash The use dust management measures during the site inspection included the sprinklers (along roads and areas of high activity), hoses (directed at material handling piles, sprinklers on the entry road, carpark, workshop, stacker and picking huts, speed limits and wheel wash. Constant running of the water cart and the street sweeper which is also washing down roads.	Compliant
O3.2	The premises must be maintained in a condition which prevents or minimises the emission of air pollutants, including dust, from the premises.	Site inspeciton to verify OEMP	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 2 identifies mitigation measures to manage dust emission OEMP Section 5.2.2 refers to management and mitgation measures including: sprinklers (along roads and areas of high activity), hoses (directed at excavator buckets), speed limits and wheel wash . The use dust management measures during the site inspection included the sprinklers (along roads and areas of high activity), hoses (directed at material handling piles, sprinklers on the entry road, carpark, workshop, stacker and picking huts, speed limits and wheel wash. Constant running of the water cart and the street sweeper which is also washing down roads.	Compliant
O3.3	The licensee must ensure that no material, including sediment or oil, is tracked from the premises.	Site inspeciton to verify OEMP	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 2 identifies mitigation measures to manage dust emission OEMP Section 5.2.2 refers to management and mitgation measures including wheel wash facility to prevent tracking of material from premises. Sighted wheel washes at both the exit points that trucks must pass through	Compliant
O3.4	Trucks entering and leaving the premises that are carrying loads must be covered at all times except during loading and unloading.	Site inspeciton to verify OEMP	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 2, table 2-2 identifies mitigation measures to manage dust emission, including the requirement for all loaded vehicles entering or leaving site to have their loads covered Trucks leaving site had their loads covered. Sighted an entry in the SEquence system where there was a truck that left the site without a cover, this was captured in the sytem, the transport company contacted and issued a first and final warning.	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
03.5	Vehicle routes in use on the premises are to be frequently wetted to prevent or minimise dust during hours of operation	Site inspecton to verify OEMP	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 2, table 2-2 identifies mitigation measures to manage dust emission, including the requirement for: "Wet suppression of haul roads is undertaken by one water cart on a regular basis" The water cart was seen regularly passing through the site	Compliant
03.6	Dust sprays and/or dust suppression systems must be installed and operated on crushing, grinding and screening equipment associated with dust generation at the premises during hours of operation.	Site inspecton to verify OEMP	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 2, table 2-2 identifies mitigation measures to manage dust emission, including : "Twelve water sprays are fitted across the crushing and screening plant and the blending plant, Water cannons are used on crushing and screening areas to manage dust generation by wind from raw feed stockpiles, and Secondary crusher is fitted with enclosure and New water spray fitted to crusher exit in September 2017." This was verified during site inspection, but these were not operational	Compliant
03.7	Entries, exits and car parks must be maintained in a good condition with a sealed hardstand road	Site inspecton to verify OEMP	Entries, exits and car parks were observed to be maintained in a good condition with a sealed hardstand road during site inspection	Compliant
03.8	All entry/exits to the premises must be maintained throughout the day to prevent any sediment tracking from the premises.	Site inspecton to verify OEMP	Entries, exits and car parks were observed to be free of sediment tracking	Compliant
03.9	An appropriate wheel wash facility must be installed, maintained and operated during the operational hours on each exit of the premises. Wheel wash infrastructure must always be maintained in a fully operational manner	Site inspecton to verify OEMP	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 2 identifies mitigation measures to manage dust emission OEMP Section 5.2.2 refers to management and mitgation measures including wheel wash facility to prevent tracking of material from premises Two wheel wash facilities present at exit points during site inspection	Compliant
03.10	The licensee must immediately cease dust generating activities under dry, windy conditions to prevent dust leaving the premises	Site inspecton to verify OEMP	No complaints pertaining to dust recorded within reporting period. There is a register of cessation of activities due to adverse weather condtions. Noted on 17/9/20 and 16/11/20 tht there was shutdown periods. When this occurred, the water cart wet everythign down and the sprays and sprinklers were turned on and run until everything calms down. In SIMS, entries for the plant shout down due to dry conditon or high winds. Noted 7/8/18, 18/7/18	Compliant
04 Effluent application to land				
04.1	Waste water must only be applied to the area within the boundary of the premises	Site inspecton to verify OEMP	The EPL does not define effluent or waste water, however, water from the sediment dam is used onsite for dust suppression. No spray or surface water was observed to be leaving the facility during the audit site inspection. The pump and tank arrangements at the dams was verified during site inspection.	Compliant
04.2	Spray from wastewater application must not drift beyond the boundary of the wastewater utilisation area which it is applied.	Site inspecton to verify OEMP	The EPL does not define effluent or waste water, however, water from the sediment dam is used onsite for dust suppression. No spray or surface water was observed to be leaving the facility during the audit site inspection.	Compliant
05 Emergency response				
05.1	The licensee must prepare, maintain and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. <i>NOTE: The licensee must develop their PIRMP in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations Act 1997 (the POEO Act) and the POEO Regulations</i>	PIRMP	Pollution Incident Response Management Plan (Boral Revision 12 dated 20 Novebeber 2020) sighted. Section 2 states: "The specific requirements for a PIRMP are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation)." According to the test schedule the plan is to be reviewed every 12 months. The Revisions table shows that it was revised at least every 12 months and audited at this time.	Compliant
06 Processes and management				

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
O6.1	Each type of waste stored on site for recovery/recycling must be stockpiled separately.	Site inspection to verify OEMP	Waste Monitoring Program dated 5 April 2018 (prepared by EMM, V2) includes details of waste monitoring and tracking including waste receipt and handling suspected contaminated material section 4.2.3 Deliveries of raw material were observed to be directed to stockpiles appropriate for the waste materials being delivered during the audit site inspection. Stockpiles for the different product types were observed during the audit site inspection.	Compliant
O6.2	The licensee must install and maintain permanent stockpile height markers that show the height of twenty (20) metres above ground level, so that a visual check can be made against the markers to determine the height of any stockpile.	Site inspection to verify Stockpile survey records OEMP	OEMP (dated May 2018) appendix L One point lesson Stockpile Heights training for staff The stockpiles are measured every month against the height of a 19m high onsite silo from a platform on the other side of the site. Inspected onsite. Personnel are trained to measure the stockpile heights and the month and person inspecting the stockpiles are recorded. Stockpile checklist observed in site office during site inspection. Sighted EPP checkoff of the monthly inspections	Compliant
O6.3	The licensee must take all practical steps to control entry to the premises	Site inspection to verify OEMP	OEMP (May 2018) Section 5.6.4 page 32 refers to security measures in place onsite including CCTV, security gates, weekly inspections of controls, and security perimeter fencing Stockpiles are measured monthly against plant to confirm height. 6 monthly fly over conducted. Verified during site inspection	Compliant
O7 Waste management				
O7.1	The Licensee must install, maintain and operate at all times a calibrated weighbridge to record the volume of all waste brought into the premises	Site inspection to verify Maintenance records, calibration records OEMP	Vehicle scale test report sighted for Mettler Toledo scale (weighbridge) (dated 25 October 2020) includes condition report, service recommendations, and details of calibration. WARP monthly reports sighted dating November 2019 to November 2020 which are submitted to EPA, all waste received is weighed and recorded. VOC's for Weighbridge operator Ben Cumberland dated 2/11/2018 sighted which includes induction on operation of the weighbridge, requirement to weigh trucks, and prohibited waste to check for including asbestos Site inspection verified that each truck is being weighed, and dockets and weighbridge reporting sighted.	Compliant
O7.2	The licensee must ensure that all waste stored or processed at the premises is assessed and classified in accordance with the EPA Waste Classification Guidelines and any applicable Resource Recovery Orders and Exemptions as in force from at the time	Waste records \ Weighbridge report \ Annual returns OEMP	Waste Monitoring Program dated 5 April 2018 (prepared by EMM, V2) includes waste types permitted under EPL in Table 5.10 WARP monthly reports sighted dating November 2019 to November 2020 which are submitted to EPA. All waste types documented in line with the activities and descriptions outlined in condition with the majority of waste pertaining to construction waste. No n/cs noted in EPA ARs. Site inspection verified that each truck is being weighed, and dockets and weighbridge reporting sighted. At the weighbridge, each load is classified as per EPA EPL requirements (refer above on QRS) and WC Guidelines.	Compliant
O7.3	Appropriate measures must be put in place to ensure that all vehicular traffic associated with any operations at the premises must pass through the wheel wash when leaving the premises, except, in circumstances where the vehicle exiting the premises is: - a motor car (being a motor vehicle constructed primarily for the carriage of persons or that is of the kind known as a utility, station wagon or panel van) or motor car trailer; and - not transporting waste to or from the premises.	Traffic management plan Staff training records OEMP Site inspection to verify	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 2 identifies mitigation measures to manage dust emission OEMP Section 5.2.2 refers to management and mitigation measures including wheel wash facility to prevent tracking of material from premises Verified during site inspection that wheel washes are in place at exits	Compliant
O8 Other operating conditions				

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
O8.1	The licensee maintain surface water detention basins with a minimum capacity to contain 45 millimetres of rainfall over any consecutive 5 day period	SWMP modelling	SWMMP page 7 Model results presented in Section 6 indicate that the facility is currently operating within this EPL conditions. Boral proposes to implement a number of water management system improvements which will reduce the risk of non-compliance with this EPL condition. SWMP Page 8 Boral has advised that visible markers are installed that indicate the 5 day 45mm rainfall runoff volume. Markers will be provided in any dam upgrade.	Compliant
O8.2	The licensee must ensure that a visible marker is installed in each sediment retention basin in a position that shows the freeboard in the basin that equates to the volume required to contain all rainfall and runoff in the catchment from a 45 millimetre rainfall event over any consecutive 5 day period.	Site inspection to verify OEMP	There are 2 water level markers in Basin 2, being colour coded marker (yellow, red sections). When the water level enters the yellow section it is nearing the limit above which it is unlikely to contain the minimum 45mm rainfall capacity. Verified during site inspection	Compliant
O8.3	All catchment/sediment, waste and stormwater dams/storage must be designed, maintained and operated with adequate capacity to store surface water collected on site as per the specifications outlined in Managing Urban Stormwater: Soils and construction - Volume 1.	Plans of catchment/sediment, waste and stormwater dams/storage infrastructure that provide with adequate capacity to store surface water collected on site as per the specifications outlined in Managing Urban Stormwater: Soils and construction - Volume 1 Design certification \ documentation in line with condition EPP schedule	CEMP Southern Perimeter Haul Road Upgrade V3 dated 27/10/2017 sighted which states: "erosion and sediment control measures consistent with the "Managing Urban Stormwater: Soils and Construction" Volume 1 (Blue Book) 4th Edition (Landcom 2006) will be implemented at the site:" ☑ Clean water diversions up-gradient of soil intrusive construction activities; ☑ Drainage, erosion and sediment control/diversion measures such as sediment fencing, socks, aggregates and/or hay bales down slope and prior to entry into the onsite detention basins (see Appendix B); ☑ During periods of heavy rainfall works will cease: ☑ Weather forecasts will be taken into consideration in determining project activities; ☑ As per condition 28. All construction vehicles exiting the site having had access to unsealed areas are to exit via the southern wheel wash. EMM Memo dated 17 June 2020 pg 2 states "The collective volume of the two water storage basins is 5.1 ML (which exceeds the required design criteria)" Environmental Permit Planner (EPP) for 2020 sighted - includes monthly checks for sediment measures	Compliant
O8.4	The Licensee must not allow the tracking of mud by vehicles leaving the premises.	Site inspection to verify	Dust management plan prepared by Ramboll Environ revision 2 dated 30/01/2018 sighted. Section 2 identifies mitigation measures to manage dust emission OEMP Section 5.2.2 refers to management and mitigation measures including wheel wash facility to prevent tracking of material from premises no mud tracking observed during site inspection	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
O8.5	All erosion and sediment controls must be installed and maintained on the premises. The controls must be inspected regularly and after each rain event and repaired if required.	Site inspection to verify Erosion and sediment control plans EPP schedule	CEMP Southern Perimeter Haul Road Upgrade V3 dated 27/10/2017 sighted which states: "erosion and sediment control measures consistent with the "Managing Urban Stormwater: Soils and Construction" Volume 1 (Blue Book) 4th Edition (Landcom 2006) will be implemented at the site." ☑ Clean water diversions up-gradient of soil intrusive construction activities; ☑ Drainage, erosion and sediment control/diversion measures such as sediment fencing, socks, aggregates and/or hay bales down slope and prior to entry into the onsite detention basins (see Appendix B); ☑ During periods of heavy rainfall works will cease: ☑ Weather forecasts will be taken into consideration in determining project activities; ☑ As per condition 28. All construction vehicles exiting the site having had access to unsealed areas are to exit via the southern wheel wash. EMM Memo dated 17 June 2020 pg 2 states "The collective volume of the two water storage basins is 5.1 ML (which exceeds the required design criteria)" Environmental Permit Planner (EPP) for 2020 sighted - includes monthly checks for sediment measures Site inspection observed the above and no mud leaving site. EPP checklist of monthly checks observed	Compliant
O8.6	Sediment and erosion control devices, including sediment fences, must be maintained at the premises in a manner that prevents stormwater discharge points from being impacted by sediment discharge.	Site inspection to verify Erosion and sediment control plans EPP schedule	Environmental Permit Planner (EPP) for 2020 sighted - includes monthly checks for sediment measures Site inspection verified this checked off each month and list of people undertaking this sighted.	Compliant
O8.7	The Licensee must ensure that all surface water runoff is collected on site and drains to a storage pond/dam.	Site inspection to verify Design certification, stormwater management plan	Current water management involves collecting site runoff in Dam 1 and transferring water collected in Dam 1 to Dam 2 Site inspection observed the site drainage flowing to dam 1.	Compliant
5 MONITORING AND RECORDING CONDITIONS				
M1 Monitoring records				
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Monitoring records for past 4 years Including Dust, Noise, Groundwater, Soil and Surface Water Interviews	Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (Dated January 2020) Sighted. Widemere Recycling Environmental Monitoring Report Sep 2020 (dated November 2020) sighted - include dust, noise, and some water monitoring records. No soil monitoring records sighted; however Boral advised no soil accepted at site. Historical water monitoring data undertaken during discharges (when permitted) dating 2015 to 2017 sighted	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
M1.2	<p>All records required to be kept by this licence must be:</p> <p>a) in a legible form, or in a form that can readily be reduced to a legible form;</p> <p>b) kept for at least 4 years after the monitoring or event to which they relate took place; and</p> <p>c) produced in a legible form to any authorised officer of the EPA who asks to see them.</p>	Monitoring records for past 4 years including Dust, Noise, Groundwater, Soil and Surface Water	<p>Some are available on the website, but not all</p> <p>Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (Dated January 2020) Sighted.</p> <p>Contained monthly dust data from two monitoring points between December 2018 and November 2019. Dust monitoring graph page 49 shows all data from July 2003 to Jul 2019.</p> <p>Noise Monitoring undertaken May 2019 data from three points as per EPL in Table 4 (page 20) Date differs between May 2019 (page 19) and April 2019 (page 20) (point for improvement)</p> <p>Widemere Recycling Environmental Monitoring Report Sep 2020 (dated Novemeber 2020) sighted includes monthly dust monitoring records from one monitoring point from January 2015 to September 2020</p> <p>No water monitoring records shown for reporting period as no discharge event occurred, however previous discharge events recorded from 2 April 2015 - 18 March 2017 (page 8)</p> <p>No soil monitoring records sighted; however Boral advised no soil accepted at site.</p>	Compliant
M1.3	<p>The following records must be kept in respect of any samples required to be collected for the purposes of this licence:</p> <p>a) the date(s) on which the sample was taken;</p> <p>b) the time(s) at which the sample was collected;</p> <p>c) the point at which the sample was taken; and</p> <p>d) the name of the person who collected the sample.</p>	Monitoring records for past 4 years	<p>Widemere Recycling Environmental Monitoring Report Sep 2020, Boral dust sampling record date 01/07/2020 - 01/12/2020, ALS Environmental water sampling reports, and Widemere Recycling Environmental Monitoring Report Sep 2020 (dated Novemeber 2020) sighted.</p> <p>Water Discharge</p> <p>a) the date(s) on which the sample was taken is included;</p> <p>b) the time(s) at which the sample was collected is included;</p> <p>c) the point at which the sample was taken is included (Point 2)</p> <p>d) the name of the person who collected the sample is included.</p> <p>Monitoring point #2 daily during discharge from site. Also note that sampling for water is normally only grab samples. Note that there have not been any discharges during this period</p> <p>Dust</p> <p>a) the date(s) on which the sample was taken is included;</p> <p>b) the time(s) at which the sample was collected is included;</p> <p>c) the point at which the sample was taken is included - (2) At the south west corner of the site (EPL license point)(3) At the south east corner of the site, adjacent the sedimentation basins</p> <p>d) the name of the person who collected the sample is included</p> <p>Noise [note that this is not actually required under the EPL]</p> <p>a) the date(s) on which the sample was taken is included;</p> <p>b) the time(s) at which the sample was collected is included;</p> <p>c) the point at which the sample was taken is included; and</p> <p>d) the name of the person who collected the sample is not included.</p> <p>Point for improvement for future sampling records is that all records include the specific items as per the condition as noise monitoring omitted the name of the person who undertook sample.</p>	Compliant
M2 Requirement to monitor concentration of pollutants discharged				

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status																				
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Monitoring records for discharges if any have occurred?	Widemere Recycling Environmental Monitoring Report Sep 2020 and Widemere Recycling Environmental Monitoring Report October 2020 (dated december 2020) sighted. from https://www.boral.com.au/sites/default/files/media/field_document/Widemere-Recycling-POELA-data-all-2010.pdf Point 1 monitors the correct pollutant using the correct unit of measurement, however details of method and frequency omitted AM-19 is the equivalent AS 3580.10.1-1991 (refer to comment in EPA guidelines, and lab used the latter. Lab report sighted. Point 2 monitors the correct pollutants using the correct unit of measurement, however details of method omitted. It does say Sampling only occurs at Monitoring point #2 daily during discharge from site. Also note that sampling for water is normally only grab samples. Note that there have not been any discharges during this period	Compliant																				
M2.2	Air Monitoring Requirements POINT 1 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Particulates - Deposited Matter</td><td>grams per square metre per month</td><td>Continuous</td><td>AM-19</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	Particulates - Deposited Matter	grams per square metre per month	Continuous	AM-19	Noted	Noted													
Pollutant	Units of measure	Frequency	Sampling Method																					
Particulates - Deposited Matter	grams per square metre per month	Continuous	AM-19																					
M2.3	Water and/ or Land Monitoring Requirements POINT 2 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Oil and Grease</td><td>milligrams per litre</td><td>Daily during any discharge</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Daily during any discharge</td><td>Grab sample</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Daily during any discharge</td><td>Grab sample</td></tr><tr><td>Turbidity</td><td>nephelometric turbidity units</td><td>Daily during any discharge</td><td>Grab sample</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	Oil and Grease	milligrams per litre	Daily during any discharge	Grab sample	pH	pH	Daily during any discharge	Grab sample	Total suspended solids	milligrams per litre	Daily during any discharge	Grab sample	Turbidity	nephelometric turbidity units	Daily during any discharge	Grab sample	Noted	Noted	
Pollutant	Units of measure	Frequency	Sampling Method																					
Oil and Grease	milligrams per litre	Daily during any discharge	Grab sample																					
pH	pH	Daily during any discharge	Grab sample																					
Total suspended solids	milligrams per litre	Daily during any discharge	Grab sample																					
Turbidity	nephelometric turbidity units	Daily during any discharge	Grab sample																					
M3 Testing methods - concentration limits																								
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place	Monitoring records	Boral Recycling Widemere Annual Review 25 November 2018 - 24 November 2019 (Dated January 2020) Sighted. Widemere Recycling Environmental Monitoring Report Sep 2020 (dated Novemeber 2020) sighted. <u>Air</u> - Dust monitoring is undertaken in accordance with the requirements of Table 2 of the development consent using NSW EPA Approved Method 19 – AS 3580.10.1 Methods of sampling and analysis of ambient air; Determination of particulate Deposited Matter – Gravimetric Method. The analysis was performed by Boral Materials Technical Services which is a NATA Accredited Laboratory (No: 9968). <u>Noise</u> - The site specific operational noise limits provided in the NMP and as per consent condition C.6 of SSD 6525 undertaken in line with Industy Noise (2017) guidelines. NMP does not specify Noise monitoring should be in line with guidelines 2017 - however note that noise is not a requirement under this licence. <u>Water</u> - During the reporting period there were no controlled discharges of water off site.	Compliant																				
M3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted. <i>Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 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>	Statements showing that the monitoring of discharges has been in accordance with the Approved Methods Publication for each of the pollutants being sampled for.	Gravimetric Dust Monitoring at Widemere for April 2020 undertaken by S Krishnamoorthy dated 20.05.2020, NATA accredited lab. Test procedure undertaken using AS 3580.10.1 Methods for Sampling and Analysis of Ambient Air Method 10.1 Determinaion of Particular Matter deposited matter - gravimetric method, these are the EPA approved methods and guidelines for modelling and assessment of air pollutants in NSW, dated November 2016	Compliant																				

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status									
M4 Recording of pollution complaints													
M4.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies	Complaints register OEMP	Complaints register (2017-2020)publically available via Boral Project website: https://www.boral.com.au/sites/default/files/media/field_document/201031%20Wide mere%20Recycling%20Complaints%20Register%20%281%29.pdf No complaints prior to 2017 but licence in place since 2003, however no complaints previous to 2017.	Compliant									
M4.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Complaints register OEMP	Complaints register (2017-2020)publically available via Boral Project website sighted a) the date and time of the complaint are included; b) the method by which the complaint was made is included; c) personal details of the complainant included; d) the nature of the complaint included; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant included; and f) if no action was taken by the licensee, the reasons why no action was taken included.	Compliant									
M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Complaints register OEMP	Complaints register (2017-2020)publically available via Boral Project website: https://www.boral.com.au/sites/default/files/media/field_document/201031%20Wide mere%20Recycling%20Complaints%20Register%20%281%29.pdf One complaint dated 13/10/2017 sighted and still available on the website	Compliant									
M4.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Complaints register OEMP	Complaints register (2017-2020)publically available via Boral Project website: https://www.boral.com.au/sites/default/files/media/field_document/201031%20Wide mere%20Recycling%20Complaints%20Register%20%281%29.pdf	Compliant									
M5 Telephone complaints line													
M5.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Telephone number Complaints register	Website has phone nnumber (1300 723 999) which Boral confirms is the complaints line	Compliant									
M5.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Telephone number evidence of community notification	While the complaints line is available on the website, no active notification evidence sighted. No evidence to suggest that proponent has notified the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Compliant									
M5.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence	Telephone number Complaints register	Noted - Not trigered	Not Triggered									
M6 Requirement to monitor volume or mass													
M6.1	For each discharge point or utilisation area specified below, the licensee must monitor: a) the volume of liquids discharged to water or applied to the area; b) the mass of solids applied to the area; c) the mass of pollutants emitted to the air; at the frequency and using the method and units of measure, specified below. <table><tr><td colspan="3">POINT 2</td></tr><tr><td>Frequency</td><td>Unit of Measure</td><td>Sampling Method</td></tr><tr><td>Continuous during discharge</td><td>kilolitres per day</td><td>By Calculation (volume flow rate or pump capacity multiplied by operating time)</td></tr></table>	POINT 2			Frequency	Unit of Measure	Sampling Method	Continuous during discharge	kilolitres per day	By Calculation (volume flow rate or pump capacity multiplied by operating time)	Has there been any discharge? If so, monitoring records	Incident Report sent to EPA dated 10 August 2020 sighted following an uncontrolled Stormwater Discharge Incident on Monday 27 July 2020 the report stated: " <i>The total volume of discharge cannot be estimated</i> " <i>This should have been monitored during the time in which this condition was triggered and as such this has been deemed non-compliant.</i> <i>However, the EPA currently does not permit discharges and as such the condition is effectovely not required. Note that the intent was to be to monitor controlled discharges and as such this needs to be updated if controlled discharges are to continue to be prevented. This should be negotiated with the EPA.</i>	Non-Compliant
POINT 2													
Frequency	Unit of Measure	Sampling Method											
Continuous during discharge	kilolitres per day	By Calculation (volume flow rate or pump capacity multiplied by operating time)											
M7 Other monitoring and recording conditions													

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
M7.1	The licensee must keep a record of each load of Soil, as referred to under Condition L4.1, that is received at the premises. The record must include, but not necessarily be limited to, the following: a) a copy of the waste classification report in accordance with the Waste Classification Guidelines, including the classification and the limits specified in the L4.1 table; b) the quantity (in tonnes) of the Soil received; c) the date and time that the Soil were received; d) the registration number of the vehicle transporting the Soil to the premises;	waste records for soil loads showing the details set out here Interviews	Boral advised no soil accepted at site	Not Triggered
6 REPORTING CONDITIONS				
R1 Annual return documents				
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	EPA Annual returns for audit period	Annual returns 26-11-2017 to: 25-11-2018 and 26-11-2018 to: 25-11-2019 sighted and contain all form items as per condition R.1.	Compliant
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	EPA Annual returns for audit period	EPA Website shows that Annual Returns have been submitted under this EPL from April 2004 to January 2020	Compliant
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period	EPA Annual returns for audit period	Annual returns 26-11-2017 to: 25-11-2018 and 26-11-2018 to: 25-11-2019 sighted and are in line with part b of the condition	Compliant
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Operations are continuing. No revocation noticed on the EPA website.	Operations are continuing. No revocation noticed on the EPA website. https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?Instid=11815&id=11815&option=licence&searchchange=licence&range=POEO%20licence&prp=no&status=Issued	Not Triggered
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Annual return - Submission records	Annual returns 26-11-2017 to: 25-11-2018 and 26-11-2018 to: 25-11-2019 sighted according to EPA's website were submitted 21 January 2019 and 23 January 2020 respectively, which is within the 60 day period	Compliant
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	EPA Annual returns	Annual Return for the period 21 February 2016 to February 2017 sighted which is retained by Boral and within the 4 years keeping period and could be provided to EPA	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
R1.7	<p>Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by</p> <p>a) the licence holder; or</p> <p>b) by a person approved in writing by the EPA to sign on behalf of the licence holder.</p> <p><i>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</i></p> <p><i>Note: An application to transfer a licence must be made in the approved form for this purpose.</i></p>	ASIC register listing Dominic Millgate as being authorised as secretary	Annual returns 26-11-2017 to: 25-11-2018 and 26-11-2018 to: 25-11-2019 sighted ASIC register sighted which denotes Dominic Milgates role as secretary	Compliant
R2 Notification of environmental harm				
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Interview on notifications PIRMP	<p>Pollution Incident Response Management Plan (Boral Revision 8 dated 13 Mrch 2017) sighted. States in section 7 page 11:</p> <p><i>"Any pollution incident satisfying the material harm threshold must be immediately reported to relevant statutory authorities by either the Site/Operations Manager, or Environment Manager"</i> Followed by the provision of the EPA- Environment Line (131 555) contact in Section 9 page 13</p> <p>A discharge event on 27 July 2020 occurred and Boral reported the event to the EPA via the EPA Environment line on Monday 27-Jul-2020. A follow up report was requested by the EPA as discussed in Condition R3</p>	Compliant
R2.2	<p>The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.</p> <p><i>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</i></p>	Interview on notifications PIRMP	<p>Pollution Incident Response Management Plan (Boral Revision 8 dated 13 Mrch 2017) sighted. Appendix K includes Boral's SoP (WROPL R-9) Reporting Incidents to the DoPE & EPA (11/01/2017) which states: <i>"Written report to be provided to the DoPE & EPA with seven (7) days of the incident occurring."</i></p> <p><i>A discharge event on 27 July 2020 occurred and Boral reported the event to the EPA via the EPA Environment line on Monday 27-Jul-2020. A follow up report was requested by the EPA as discussed in Condition R3 and provided 10 August 2020 to the EPA's satisfaction, however this was not causing material harm.</i></p>	Compliant
R3 Written report				
R3.1	<p>Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <p>a) where this licence applies to premises, an event has occurred at the premises; or</p> <p>b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.</p>	Email request by EPA regarding discharge event occurring July 2020 R3 Report in response to discharge event	An email from Rasha Danoun (EPA) dated 27th July 2020 sighted which states: "The EPA requests Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020." The report (dated 10 August 2020) was requested by EPA in response to a discharge event 27 July 2020: " This report has been prepared in accordance with the EPA request for Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020." Incident Report to EPA dated 10 August 2020 sighted and pertaining to Widemere Recycling Facility (EPL 11815) – Stormwater Discharge Incident which stated: "This report has been prepared in response to the event self-reported by Boral Resource (NSW) Pty Ltd (Boral) on Monday 27-Jul-2020 regarding discharge from the Boral Widemere Recycling site located at 38 Widemere Rd WETHERILL PARK NSW 2164 (the Site) during a sustained wet weather event. This report has been prepared in accordance with the EPA request for Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020."	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Email request by EPA regarding discharge event occurring July 2020 R3 Report in response to discharge event	An email from Rasha Danoun (EPA) dated 27th July 2020 sighted which states: "The EPA requests Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020." The report (dated 10 August 2020) was requested by EPA in response to a discharge event 27 July 2020: "This report has been prepared in accordance with the EPA request for Boral to submit an R3 report of the incident in accordance with Condition R3.3 of the EPL by COB Monday 10 August 2020."	Compliant
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Email request by EPA regarding discharge event occurring July 2020 R3 Report in response to discharge event	Incident Report sent to EPA dated 10 August 2020 sighted a) the cause, time and duration of the event are included; (Monday 27-Jul-2020 regarding discharge from the Boral Widemere Recycling site located at 38 Widemere Rd WETHERILL PARK NSW 2164 (the Site) during a sustained wet weather event.) b) the total volume cannot be estimated, however "we (Boral) would expect that the water discharged would have been less polluted than the receiving waters." c) the name, address and business hours telephone number of Adrian Preece provided; d) No information provided for the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort because N/A e) Boral reported the event to the EPA via the EPA Environment line on Monday 27-Jul-2020. Since the cessation of the wet weather, the Site has transferred water into the onsite water storage tanks that have a total capacity of 250,000L and has been actively consuming the water held in the basins and water storage tanks as water spray in the processing plant. There were no complaints recorded f) the water management system upgrades that have been completed in 2019 are able to demonstrate that the water management system and operational practices are	Compliant
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Email request by EPA regarding discharge event occurring July 2020 R3 Report in response to discharge event	Email Response from Rashad Danoun of EPA dated 10 November 2020 sighted which states: "The EPA has reviewed the information provided and address all the elements associating with the incident, based on these information the EPA concluded that no further regulatory actions will be taken in this instance. However the EPA reminds Boral of their obligation to comply with the conditions under the pollution reduction program of its EPL 11815 until these PRP are considered completed by the EPA and removed from this licence."	Compliant
7 GENERAL CONDITIONS				
G1 Copy of licence kept at the premises or plant				
G1.1	A copy of this licence must be kept at the premises to which the licence applies	Site inspection to verify	Sighted during site inspection	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Site inspection to verify	Sighted during site inspection	Compliant
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Site inspection to verify	Sighted during site inspection	Compliant
8 POLLUTION STUDIES AND REDUCTION PROGRAMS				
U1 Water Pollution Management				
Cessation of Discharge				
U1.1	No discharge of water is permitted from the Premises until water quality levels stabilise and monitoring results are provided to the EPA. Any excess water captured on the Premises must be disposed of at a facility that can lawfully receive that type of waste. Recommencement of discharge from the Premises must be approved in writing by the EPA.	Discharges required?	There have been no controlled discharges as not permitted	Not Triggered
Surface Water Discharge Characterisation Assessment				

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
U1.2	The Licensee must engage a suitably qualified and experienced person to prepare a Surface Water Discharge Characterisation Assessment	Surface Water Discharge Characterisation Assessment Qualifications of author	Surface Water Characterisation Assessment prepared by RHDHV dated 5 April 2017 (Revision B) Qualifications and experience not included as part of plan; however author is known to auditor and he's considered qualified.	Compliant
U1.3	The Surface Water Discharge Characterisation Assessment, must be submitted to the EPA by Friday 31 March 2017.	Surface Water Discharge Characterisation Assessment submission certificate/evidence	In a letter from Celeste Foretal (22 December 2016) the EPA states that : " On 12 Decemeber 2016 you submitted to the EPA your proposed approach to the Surface Water Characaterisation Assessment ". Subsequently, iln letter dated to Melissa Ward (EPA) from Greg Johnson (Boral) dated 5 April 2017, the Surface Water Characterisation Assessment prepared by RHDHV was submitted noting: "This report was due to be submitted on 31 March 2017, however to include water results and analysis from 23 March 2017 Boral communicated with yourself and agreed to submit by 5 April 2017." Note a letter from Melissa Ward dated 16 June 2017 stated receipt of SWCA, however EPA required review to satisfy conditions U1.2 to U1.9	Compliant
U1.4	The Surface Water Discharge Characterisation Assessment must include, at a minimum: a.) identification of all the potential pollutants of concern which may be present in a discharge from the Premises. This list is to be developed in consultation with the EPA; b.) water sampling and reference to all relevant existing data for all identified potential pollutants of concern in the sediment basin or site discharges, including but not limited to: i.) a full suite of current analytes from the Surface Water Monitoring and Mitigation Plan; ii.) a full suite of metals, including aluminium, boron, silver and tin; iii.) any other potential pollutants such as current or proposed treatment chemical residuals. c.) sufficient sampling to capture the full variability of water quality at the Premises, including average or typical through to worst case scenarios, guided by protocols to ensure that sampling events are triggered by the full range of operational processes that would materially impact water quality, and be linked to ongoing implementation of mitigation measures, e.g. representative data before and after dredging of sediment basins. As a minimum the Licensee must: i.) undertake 5 independent sampling events within the sediment basin (post dredging); and ii.) collect samples that coincide with significant runoff events before 31 March 2017. d.) an assessment of the potential impact of discharges on receiving waters, based on the surface water characterisation and with reference to ANZECC (2000) assessment criteria for slightly-to moderately disturbed ecosystems and the NSW Water Quality Objectives for Prospect Creek (note that the ANZECC (2000) toxicant decision tree can be used to refine the default trigger values (See Section 3.4.3.2 "Decision tree for applying the guideline trigger values")). e.) Specify the analytical limits of reporting used for any existing and new data that is being	Surface Water Discharge Characterisation Assessment	Surface Water Characterisation Assessment prepared by RHDHV dated 5/4/2017 sighted a.)Boral provided a list of potential pollutants of concern to the EPA in a letter dated 12 December 2016. EPA agreed that the list of pollutants was appropriate in a letter dated 22 December 2016. Relevant correspondence is provided in Appendix F of SWCA dated 5/4/2017. b.) Boral collected 9 samples from the lower sedimentation dam (referred to as Dam 2) between mid-December 2016 to the end of March 2017. Each sample was tested for a full suite of analytes from SWMMP. ii.) Table A1 included in Appendix A of SWCA included anayltes Aluminium, Boron, Silver and Tin c.) i.) Boral collected 9 samples from the lower sedimentation dam (referred to as Dam 2) between mid-December 2016 to the end of March 2017. 6 of the 9 samples were collected post dredging; ii.) 7 of the 9 samples were collected during wet weather conditions. before 31 March 2017 as per figure 6 in section 4.2 of SWCA d.) The water quality monitoring results were assessed with reference to the ANZECC (2000) Guidelines e.) Laboratory analytical methods were selected based on advice from ALS Environmental (Sydney). Where possible, the adopted laboratory analytical methods were selected to achieve Limits of Reporting (LOR) that were at or below the adopted	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
	<p>assessed and:</p> <p>i.) compare that limit of reporting to the relevant ANZECC (2000) assessment criteria for slightly-to moderately disturbed ecosystems;</p> <p>ii.) where the limit of reporting does not provide a suitable basis for assessing risk of water pollution, propose alternative options to characterise the risk, including more sensitive laboratory testing or risk mitigation options. The level of reporting for concentrations of pollutants should be sensitive enough to detect pollutants at levels related to their environmental risk and ANZECC (2000) toxicant trigger value (where available) while having regard to the best available analytical practical quantification limits using available technology. Sampling and analysis for the characterisation must be in accordance with the Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (2004).</p>		<p>trigger levels. Unavoidable exceptions were Chlorine, Bis(2-ethylhexyl) phthalate (DEHP) and Di-n-Octylphthalate.</p> <p>i.) Section 4.3.1 states: "...trigger values were established by Victory Engineering for each detected contaminant using the methods documented in the ANZECC (2000) Guidelines for slightly-to moderately disturbed ecosystems."</p> <p>ii.) List provided in Appendix D. A sample of these were checked against the the guideline titled Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (2004). Sampling and analysis has generally been undertaken in accordance with the guideline.</p>	
Surface Water Mitigation and Monitoring Plan				
U1.5	The Licensee must engage a suitably qualified and experienced person to prepare a Surface Water Mitigation and Monitoring Plan.	Surface Water Mitigation and Monitoring Plan. Evidence of submission to EPA	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted. Qualifications and experience not included as part of plan; however author is known to auditor and he's considered qualified.	Compliant
U1.6	The Surface Water Mitigation and Monitoring Plan, must be submitted to the EPA by Friday 28 April 2017.	Surface Water Mitigation and Monitoring Plan. Evidence of qualifications	Email from Jason Sweeney (Boral) (dated April 28 2017) to Melissa Ward (EPA) with attached Surface Water Monitoring and Mitigation Plan prepared by RHDHV	Compliant
U1.7	<p>The Surface Water Mitigation and Monitoring Plan must include, as a minimum, the following components:</p> <p>a.) an investigation of practical measures that could be taken to avoid or minimise pollution based on the Surface Water Discharge Characterisation Assessment at U1.4. Consideration should include but not be limited to at-source controls on site, reducing wastewater run-off volumes, treatment options and associated wastewater storage requirements.</p> <p>b.) justification for rejecting options assessed at U1.7a.</p> <p>c.) development of a program of preferred mitigation measures with proposed timeframes for implementation;</p> <p>d.) in the context of the proposed mitigation measures at U1.7c, a review of the water balance must be undertaken to determine appropriate detention and discharge volumes for managed overflows based on the level of water pollution risk. This review must take into account that the current managed overflow regime is based on uncontaminated discharge quality and is therefore inappropriate;</p> <p>e.) establish an ongoing runoff and discharge monitoring program to validate outcomes of the proposed mitigation measures. The program must include at a minimum:</p> <p>i.) identification of pollutants to be monitored based on the Surface Water Discharge Characterisation Assessment and mitigation measures proposed in U1.7c above;</p> <p>ii.) identification of appropriate trigger values for pollutants and proposed actions and mitigation measures for managing pollutant exceedances;</p> <p>iii.) monitoring of rainfall;</p> <p>iv.) monitoring of discharge frequency and volumes;</p> <p>v.) location of monitoring points;</p> <p>vi.) frequency of monitoring; and</p> <p>vii.) method of monitoring.</p>	Surface Water Mitigation and Monitoring Plan.	<p>Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted.</p> <p>a.) Section 7 reviews potential mitigation measures and selects and justifies a preferred suite of water management improvement works.</p> <p>b.) Section 7 reviews potential mitigation measures and selects and justifies a preferred suite of water management improvement works.</p> <p>c.) Section 7 reviews potential mitigation measures and selects and justifies a preferred suite of water management improvement works. Section 8 provides an implementation schedule for the proposed works program.</p> <p>d.) Section 5 documents the development and calibration of a site water balance model. The model was applied to assess compliance with EPL conditions. Section 6.2 applies the water balance results and the outcomes of the SWCA to establish potential water quality risks to receiving waters.</p> <p>e.) A surface water monitoring program is detailed in Section 9. This program addresses each of the monitoring requirements listed in this EPL Condition.</p> <p>i.) This assessment is informed by the outcomes of the SWCA;</p> <p>ii.) Trigger values were established by Victory Engineering for each detected contaminant using the methods documented in the ANZECC (2000) Guidelines for slightly-to-moderately disturbed ecosystems. These trigger values provide a conservative reference for water quality that is unlikely to cause environmental harm to a slightly-to-moderately disturbed watercourse.</p> <p>iii.) Boral propose to implement a surface water monitoring plan that includes: Monitoring of site rainfall, The occurrence, duration and volume of site overflows to be estimated</p> <p>v.) location of monitoring points included in Appendix A map page 78</p> <p>vi.) frequency of monitoring included in table 9-3</p> <p>vii.) method of monitoring not included</p>	Not Triggered
U1.8	Contingency options must be developed and included in the Surface Water Mitigation and Monitoring Plan to account for any mitigation options that do not adequately address the site water pollution risks.	Surface Water Mitigation and Monitoring Plan.	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted. A section 9.2 Contingency Options table 9-4 includes summary of contingency options	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
U1.9	The Surface Water Mitigation and Monitoring Plan must be approved in writing by the EPA prior to implementation. Appropriate concentration discharge limits, volume discharge limits and ongoing monitoring requirements will be placed as conditions on the Licence and the EPA will consider if additional performance criteria will require licence conditions.	Surface Water Mitigation and Monitoring Plan. Correspondence between Boral and agencies and EMM.	Letter from Greg Johnson (Boral) to Melissa Ward (EPA) dated 28 April 2017 providing SWMMP for review Document submitted to DPIE on 7/5/18, and referred to EPA, however was not approved. EPA has raised concerns (letter dated 20/4/18). These are yet to be addressed by Boral. Letter from Chris Ritchie of DPIE dated 28/05/2018 approving OEMP and noting that SWMMP need to be submitted to EPA addressing the items in EPA's letter dated 3 April 2018. Letter from EMM dated 17 June 2020 outlines that the EPA are still reviewing the SWMMP. An incident occurred whereby stormwater discharge occurred after heavy rain and was reported to EPA who responded in an email dated 10 November 2020 stating: "the EPA reminds Boral of their obligation to comply with the conditions under the pollution reduction program of its EPL 11815 until these PRP are considered completed by the EPA and removed from this licence" Email correspondence with Rashad Danoun (EPA) dated 8 December 2020 sighted. The EPA had undertaken a review of the documents and progress made by both EPA and Boral with respect to Water Management and PRP for the site. The email states: "Boral to provide a formal response to the EPA letter DOC17/457692 dated 6 September 2017 (attached) addressing all the outstanding points and provide updated Surface Water Characterisation Plan and Surface Waste Monitoring and Mitigation" Boral requested that a formal meeting is undertaken between EPA and Boral to discuss progress with PRP and Water Management at the Widemere facility in an email dated 4/12/2020. EPA agreed that this could take place in the new year (2021) in an email dated 4/12/2020 EPA and Boral are discussing the PRP and water management discussions for the site are ongoing	Not Triggered
Air Quality Management Plan				
U1.10	The Licensee must engage a suitably qualified and experienced person to prepare a Surface Water Validation Report.	Surface Water Validation Report - believe this has not been triggered yet? Evidence of person qualification	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted and it says: <i>Surface Water Validation and Audit Reports: These documents will be prepared following the implementation of any approved changes to the facility's water management system. These documents will be informed by water quality and level data and will assess the effectiveness of the implemented surface water management system in complying with development consent and EPL conditions.</i>	Not Triggered
U1.11	The Surface Water Validation Report must include, at a minimum: a.) the results of the Surface Water Mitigation and Monitoring Plan at U1.7; b.) characterisation of the water discharge quality in accordance with ANZECC (2000) assessment criteria; c.) demonstration that water quality in each surface water control / management / treatment structure is consistent with its respective design purpose and treatment efficiency and that surface water is being managed in accordance with the discharge conditions of the Licence; d.) an assessment of the effectiveness of implemented mitigation options; e.) demonstration that the Licence regulates the discharge of all pollutants that pose a risk of non-trivial harm to human health or the environment; f.) confirmation that the site water balance including validation of the sediment pond storage and predicted discharge volume is consistent with the potential pollutant risks; g.) a representative ongoing monitoring program for site discharges	Surface Water Validation Report - requirement not yet triggered	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted but has not yet been approved or implemented and as such the requirement to undertake the Surface Water Validation report has not yet been triggered.	Not Triggered

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
U1.12	If monitoring shows that water quality or volume discharge is not being managed in accordance with discharge conditions of the Licence, the Mitigation and Monitoring Plan must be updated to: a.) propose additional mitigation measures to control and / or treat all pollutants that represent a risk of non-trivial harm, including any relevant contingency options identified under U1.8; and b.) propose a timeframe for the implementation of these additional mitigation measures.	Surface Water Validation Report - requirement not yet triggered	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted but has not yet been approved or implemented and as such the requirement to undertake the Surface Water Validation report has not yet been triggered.	Not Triggered
U1.13	The Surface Water Validation Report, must include any further contingency options as necessary and an updated Mitigation and Monitoring Plan must be submitted to the EPA within 3 months of the implementation of mitigation measures agreed to in the Surface Water Mitigation and Monitoring Plan at U1.7.	Surface Water Validation Report submission to EPA	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted but has not yet been approved or implemented and as such the requirement to undertake the Surface Water Validation report has not yet been triggered.	Not Triggered
U1.14	The updated Surface Water Mitigation and Monitoring Plan must be approved in writing by the EPA prior to implementation. Appropriate concentration discharge limits, volume discharge limits and ongoing monitoring requirements will be placed as conditions on the Licence and the EPA will consider if additional performance criteria will require licence conditions	Surface Water Validation Report Approval by EPA	Surface Water Monitoring and Mitigation Plan prepared by RHDHV dated 28/04/2017 (Revision B) Sighted but has not yet been approved or implemented and as such the requirement to undertake the Surface Water Validation report has not yet been triggered.	Not Triggered
9 SPECIAL CONDITIONS				
E1 Air Quality				
Air Quality Management Plan				
E1.1	Prior to increasing processing up to 1,000,000 tonnes the Licensee must prepare and implement an Air Quality Management Plan (AQMP). The AQMP must include: (a) Proactive and reactive management strategies. (b) For all pollutant emission sources, as minimum: • key performance indicator(s) for emission controls; • monitoring method(s) including location, frequency and duration; • response mechanisms; • responsibilities; • record keeping; and • compliance reporting.	Air Quality Management Plan (AQMP) dated prior to expanded operations commencing Is this available yet?	Extended operations have not yet commenced, therefore this condition is not triggered.	Not Triggered
Best Practice Management Review for Particle Emissions				

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
E1.2	<p>By no later than 26 May 2017, the Licensee must undertake a site audit, completed by a suitably qualified third party, to identify all fugitive particulate matter emission sources, and benchmark the mitigation measures against best practice. The objective of the audit is to:</p> <p>(a) identify fugitive particulate matter emission sources, and rank sources in order of emission potential;</p> <p>(b) identify and implement proactive and reactive management strategies for each identified particulate matter emission source, for inclusion in the Air Quality Management Plan;</p> <p>(c) identify the mitigation measures currently applied to each identified emission source;</p> <p>(d) benchmark the current mitigation measures against best practice performance indicators;</p> <p>(e) where current mitigation measures are not consistent with best practice, the identification of remedial or upgrade works to mitigate the emission source in line with best practice;</p> <p>(f) evaluate the practicability of implementing best practice measures; and</p> <p>(g) propose a timeframe for implementing all practicable best practice mitigation measures. The methodologies and outcomes of the audit must be contained in a detailed report submitted to the EPA by no later than 30 June 2017. The Best Practice Management Review for Particle Emissions will be formalised as a condition of the Licence.</p>	Air quality audit report	<p>Boral Widemere Resource Recovery Facility - Best Practice Dust Management Benchmarking Study by Ramboll Environment dated 29/06/2017 sighted. Letter to Melissa Ward (EPA) dated 30th June 2017 sighted and email showing attached report. In line with deadline in condition.</p> <p>There were a number of issues identified by the EPA and the audit found the following items.</p> <p>(a) Table 1: Overview of dust sources, controls and observations during the site visit don't appear to have been ranked in terms of emission potential;</p> <p>(b) Table 2: BMPR for Boral Widemere Resource Recovery Facility;</p> <p>(c) Table 2: BMPR for Boral Widemere Resource Recovery Facility includes measures in place for emission sources</p> <p>(d) Table 2: BMPR for Boral Widemere Resource Recovery Facility includes comparison with best practices</p> <p>(e) Table 2: BMPR for Boral Widemere Resource Recovery Facility no suggestion of upgrade works</p> <p>(f) Table 2: BMPR for Boral Widemere Resource Recovery Facility does not include a discussion on how to practically achieve measures</p> <p>(g) no timeframe proposed</p> <p>An updated report was prepared this report is dated 29/09/2017. The EPA has reviewed the updated document and noted that there was no further comment.</p>	Compliant
E2 Requirement to maintain Financial Assurance				
E2.1	<p>(a) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA. The financial assurance must be in favour of the EPA for a total amount to be held by the EPA of seven hundred thousand dollars (\$700,000.00). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance contains a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.</p> <p>(b) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA by 30 November 2017 to replace the financial assurance referred to in the previous paragraph (paragraph a). The financial assurance must be in favour of the EPA for a total amount to be held by the EPA of one million, two hundred thousand dollars (\$1,200,000.00). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.</p> <p>(c) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and</p>	Evidence a financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia provided to EPA in line with amounts and timings in a, b, and c,	<p>a) Bank Guarantee from NAB dated 8 December 2016 sighted. Letter dated 13 December 2016 from Celeste Forestal (EPA) sighted which states that: "The EPA confirms that we have received bank guarantee BORAL RECY00056 for the total amount of \$700,000.00 for EPL 11815"</p> <p>b) Bank Guarantee from NAB dated 11 October 2017 sighted for the amount of \$500,000.</p> <p>c) Bank Guarantee from NAB dated 5 December 2018 sighted for the amount of \$500,000. Letter dated 30 July 2019 from EPA states that "The financial assurance was received in the form of a NAB Bank Guarantee of AUD 500,000.00" and "The EPA has reviewed the Bank Guarantee and notes that it meets all EPA requirements"</p>	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
	supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA by 30 November 2018 to replace the financial assurance referred to in the previous paragraph (paragraph b). The financial assurance must be in favour of the EPA for a total amount to be held by the EPA of one million, seven hundred thousand dollars (\$1,700,000.00). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person			
E2.2	The financial assurance must be maintained during the operation of the facility and thereafter until such time as the EPA is satisfied the premises is environmentally secure	Financial assurance evidence	Financial assurances as per condition E2.1 maintained, as per email from Frank Ranieri dated 22/12 with information on BG register. Unclear whether EPA has deemed premises environmentally secure however it's expected this will only occur after all PRPs are in place.	Compliant
E2.3	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises	Noted	Noted	
E2.4	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence	Noted	Noted	
E2.5	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder	Noted	Noted	
E3 Environmental Obligations of Licensee				
E3.1	While the licensee's premises are being used for the purpose to which the licence relates, the licensee must: a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents. b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA. c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.	PIRMP Site inspection to verify Waste records Discussion with Boral	Pollution Incident Response Management Plan dated 13 March 2017 (V8) sighted. a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents outlined in section 8 of PIRMP and PIRMP Actions in Appendix 2. b) Nothing pertaining to unlawfully deposited liquid or solid waste in OEMP. However table 6.1 of OEMP on page 38 states that " <i>The facility will not knowingly accept waste other than those listed within EPL 11815</i> " and that EPA will be reported to immediately and DPIE within seven days This relates to the unexpected finds protocol that is being negotiated with the EPA - refer to the details above. c) Monitoring data publically available online but additional informatin is held by Boral, as with recording as outlined in EPL e.g. M3.1 Boral advises that waste that cannot be accepted at Widemere is removed by licensed waste contractors and recorded in the waste register Rejected load register as detailed above Sequence/SIMs extract regarding incidents and close out viewed onsite, as per details noted above.	Compliant

Condition Number	Requirement	Evidence Requested	Findings and Recommendations	Compliance Status
E3.2	<p>In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must:</p> <p>a) Make all efforts to contain all firewater on the licensee's premises; b) Make all efforts to control air pollution from the licensee's premises; c) Make all efforts to contain any discharge, spill or run-off from the licensee's premises; d) Make all efforts to prevent flood water entering the licensee's premises; e) Remediate and rehabilitate any exposed areas of soil and/or waste; f) Lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of; g) At the request of the EPA monitor groundwater beneath the licensee's premises and its potential to migrate from the licensee's premises; h) At the request of the EPA monitor surface water leaving the licensee's premises; and i) Ensure the licensee's premises is secure.</p>	Protocol and action following extreme event where applicable OEMP	<p>a) Potential Polluting Substances on page 6 of PIRMP includes table which lists Fire Fighting equipment as potential pollutant and follows up in Appendix 2 with appropriate mitigation measures b) Dust Management Plan c) Make all efforts to contain any discharge, spill or run-off from the licensee's premises; d) Make all efforts to prevent flood water entering the licensee's premises; e) Remediate and rehabilitate any exposed areas of soil and/or waste; f) Lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of; g) At the request of the EPA monitor groundwater beneath the licensee's premises and its potential to migrate from the licensee's premises; h) At the request of the EPA monitor surface water leaving the licensee's premises; and i) Ensure the licensee's premises is secure.</p>	Compliant
E3.3	<p>After the licensee's premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must:</p> <p>a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; and b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination</p>	Noted	Noted	Not Triggered
E4 EPA may claim on Financial Assurance				
E4.1	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	Noted	Noted	Not Triggered

Appendix D | Independent Audit Declaration Form

12/02/2021

Shoanne Labowitch
Environment Manager NSW/ACT
Boral Australia HSE
Level 5 - Trinit 2,
39 Delhi Road, North Ryde NSW

Dear Shoanne

**Re: Widemere Construction and Demolition Recycling Facility Environmental Auditing
- Declaration of Independence**

This is a Declaration of independence by Shireen Baguley in accordance with Independent Audit Post Approval Requirements (Department of Planning and Environment 2020).

I confirm that for the purposes of independence and avoiding conflicts of interest, I:

- am not related to any Applicant, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child
- do not have any pecuniary interest in the project, Applicant or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- have not provided services (not including independent reviews or auditing) to the project with the result that they audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- am not an Environmental Representative for the project;
- will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Yours faithfully

For Molino Stewart Pty Ltd



Shireen Baguley

Director

<https://molinostewart.sharepoint.com/sites/1200-1300/Shared Documents/1244 Widemere Recycling Facility - IEA/Reports/Final/Attachments/Appendix D - IEA Declaration Form/1244 Declaration of independence.docx>

Appendix E | Site Inspection Photographs

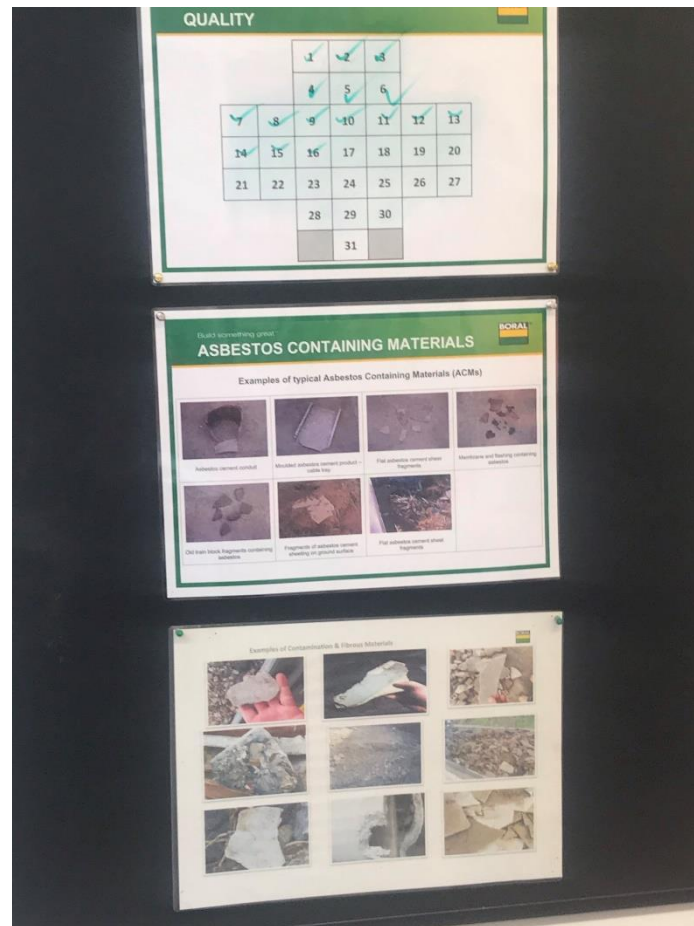


Photo 1: Asbestos awareness signage



Photo 2: Bunded area for refueling



Photo 3: Bunded chemical storage at workshop

A daily dam checklist form is pinned to a wall. The form has a header section with a date field (30/12/2020) and a table with columns for Name, Time Checked, Previous 24hr Rainfall (mm), Top Dam Level (Low, Medium, High), Bottom Dam Level (Low - 1.5m, Medium - 1.5m to 2.5m, High - 2.5m to 3.0m), Water Temperature (°C), Wind Speed (km/h), Wind Direction, and a section for Dam Condition (Cracks, Erosion, etc.). The table contains handwritten entries for various dates from 01/12/2020 to 15/12/2020, with names like "Domenico", "Rui", "Sofia", and "Domenico" and various measurements and observations.

Photo 4: Daily Dam checklist



Photo 5: Dam 1



Photo 6: Dam 2 with pump out infrastructure



Photo 7: Docket from load arriving at weighbridge

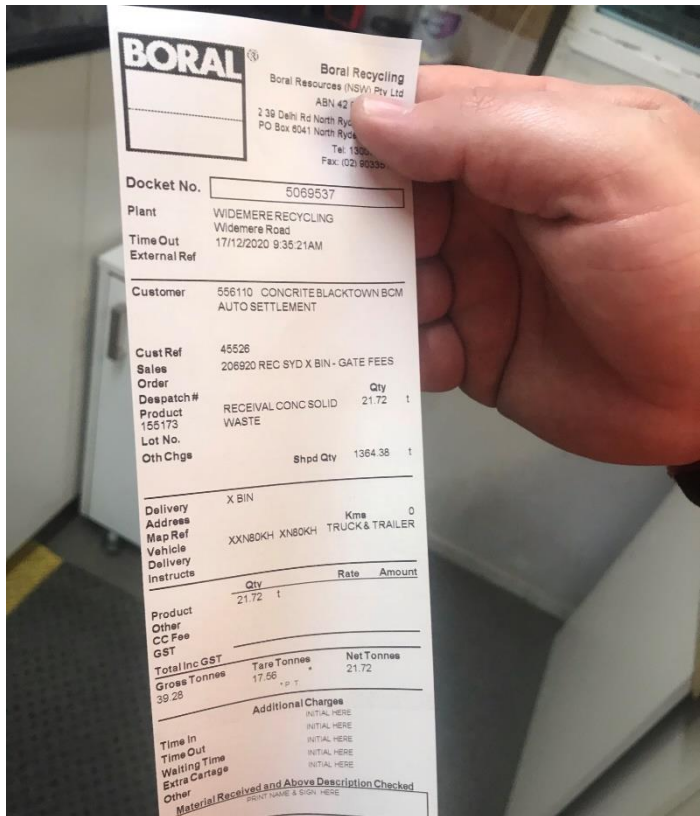


Photo 8: Docket issued after accepting load arriving at weighbridge



Photo 9: Environmental Permit Planner checklists



Photo 10: Gas bottle storage at workshop



Photo 11: Haul road with bunding in place



Photo 12: Inspection of load at weighbridge



Photo 13: Flood lighting used to illuminate areas towards the east of the site is directed downwards and into the site.



Photo 14: Oil and grease separator at workshop



Photo 15: Plant in operation



Photo 16: Pump out infrastructure and water storage tanks at Dam 2



Photo 17: Silos against which stockpiles are measured



Photo 18: Spill kits at workshop



Photo 19: Waste sorting bins at workshop



Photo 20: Water cart in use onsite



Photo 21: Wheelwash at exit

Appendix F | Consultation with Authorities

Organisation/Authority	Comment	Relevant Conditions in CoA (if applicable)	Evidence Used	Findings and Recommendations	Compliance Status
NSW EPA	Rashad Danoun Operations Officer, Regulatory Operations Metropolitan West, NSW Environment Protection Authority replied in email dated 5/11/2020 "Hi Rebecca, The licence was varied in May 2020. The licence has currently pollution reduction programs (PRPs), Boral believes that they met the requirement under these PRPs and the EPA is assessing these completion. I would suggest to add this to the scope of the audit to ensure Boral has met the requirement under these PRPs and verify the actions taken to complete these PRPs."	EPL 8 POLLUTION STUDIES AND REDUCTION PROGRAMS Condition U1; and C41 - C48	Surface Water Discharge Characterisation Assessment Surface Water Mitigation and Monitoring Plan. Correspondence from the EPA and discussions with Boral on status.	During the onsite audit, Boral advised that it had received email correspondence from Rashad Danoun (EPA) in early December 2020 and he had advised that the EPA has completed a review of the documents and progress made by Boral with respect to Water Management and PRP for the site. The EPA has requested Boral provides a formal response to the EPA letter DOC17/457692 dated 6 September 2017 to outlining its response to the points raised within it and provide an updated Surface Water Characterisation Plan and Surface Waste Monitoring and Mitigation. Boral has requested that a formal meeting is undertaken between EPA and Boral to discuss progress with PRP and Water Management at the Widemere facility and the EPA has agreed that this could take place in the new year (2021). EPA and Boral are discussing the PRP and water management discussions for the site are ongoing	Refer to the relevant conditions in the EPL.
NSW DPIE	No response received	N/A	N/A	N/A	Not Triggered
Fairfield City Council	Ahmad Faizi Senior Environmental Health Officer, Environmental and Public Health Compliance, Fairfield City Council replied in an email dated 12/11/2020: "Hi Shireen, I write in response to your email below regarding Environmental audit of Bowral. Council Environmental Management Team considers the following matters to be included in the assessment scope: -Asses prospect creek for contaminants -Compliance with condition of consent and licence •Air quality •Noise •Surface water assessment •Waste management A screening test under the thresholds in Applying SEPP 33 for dangerous goods was conducted. The assessment concluded that 'the facility would not be a hazardous or offensive development provided appropriate setbacks from hazardous materials storage areas are maintained. Assess the setbacks from hazardous materials storage. Council would also like to review the auditor report once it is finalised."	C1 - C2 Waste management, C3 - C11 Noise, C12 - C21 Air quality, C31 - C37 and C41 - C48 Surface Water, C60 Hazardous Goods	Waste Management Plan Noise and vibration management plan Air quality/Dust Management plan Surface water mitigation and monitoring plan EIS	The project's compliance with the Conditions of Approval and EPL are covered by the scope of this audit. As per the conditions, this audit report will be made publicly available on Boral's website following the completion of the audit. The projects compliance with the following are as follows: C1 - C2 Waste management, C3 - C11 Noise, C12 - C21 Air quality, and C31 - C37 and C41 - C48 Surface Water, Surface Water Characterisation Assessment prepared by Royal Haskoning DHV dated 5 April 2017 sighted and reviewed. It states: "Potential for impacts to Prospect Creek water quality would increase if Dam 2 water is discharged outside of significant wet weather periods (i.e. via controlled discharges). Controlled discharges are currently not permitted by EPL (Condition U1) and no controlled discharges occurred over the monitoring period." Page v Reviewed Statement of Environmental Effects (EMM, 29 May 2015) and Hazardous and Offensive Development Application Guidelines Applying SEPP 33. As per the listed items in EIS and table 1 in the SEPP 33 Guidelines is was determined that: " : If the quantity is below the minimum quantity in Table 1, then it is not potentially hazardous and there is no need to use the graph" As such, the materials onsite are not potentially hazardous and as such there are no setbacks applicable.	Refer to the relevant conditions in the condition of consent and EPL.

Rebecca O'Rourke

From: Rashad Danoun <Rashad.Danoun@epa.nsw.gov.au>
Sent: Thursday, 5 November 2020 11:34 AM
To: Rebecca O'Rourke
Cc: Shireen Baguley
Subject: RE: Request for contact details to undertake audit consultation (EPL 11815) [ref:_00D7F6iTix._5007F14baDY:ref]

Hi Rebecca,

Thanks for the chat earlier, as we discussed I am the operation officer looking after the EPL 11815 for Boral Widemere.

The licence was varied in May 2020.

The licence has currently pollution reduction programs (PRPs), Boral believes that they met the requirement under these PRPs and the EPA is assessing these completion.

I would suggest to add this to the scope of the audit to ensure Boral has met the requirement under these PRPs and verify the actions taken to complete these PRPs.

Please do not hesitate to contact me should you have any questions.

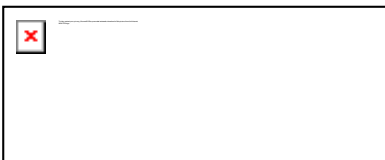
Cheers,

Rashad Danoun
Operations Officer
Regulatory Operations Metropolitan West
NSW Environment Protection Authority
D 02 9995 6370

COVID-19 Restrictions

EPA Staff are currently working remotely. Mail received through the post is not being checked every day. If you send correspondence by post it is recommended that you also email a copy to RegOps.MetroRegulation@epa.nsw.gov.au so we can respond in a timely manner.

We appreciate your patience during this time.



www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

From: Environment Line <info@environment.nsw.gov.au>
Sent: Wednesday, 4 November 2020 12:03 PM
To: rorourke@molinstewart.com.au

Cc: sbaguley@molinostewart.com.au

Subject: RE: Request for contact details to undertake audit consultation (EPL 11815) [ref:_00D7F6iTix._5007F14baDY:ref]

Hi Rebecca,

I have notified the officer responsible for EOL11815 for a response.

Kind regards,

Hillan

Digital Information Office (DIO) | Corporate Services Department of Planning, Industry and Environment
T 131 555 | E info@environment.nsw.gov.au
4 Parramatta Square, 12 Darcey St, Parramatta NSW 2150
<https://www.epa.nsw.gov.au/about-us/contact-us/environmentline>
www.dpie.nsw.gov.au

----- Original Message -----

From: Rebecca O'Rourke [rorourke@molinostewart.com.au]

Sent: 4/11/2020 10:50 AM

To: info@epa.nsw.gov.au

Cc: sbaguley@molinostewart.com.au

Subject: Request for contact details to undertake audit consultation (EPL 11815)

To whom it may concern,

We are undertaking an independent environmental audit for a facility covered under EPL 11815. I had initially tried to call through the EPA contact line, however I reached a dead end number after being transferred several times.

As part of the audit consultation we need to make contact with an EPA staff member to discuss any areas additional to the conditions of the EPL which may need to be addressed. Previous audits listed the contact person at the EPA as Deanne Pitts.

Could you please advise whether this is still the contact person relevant to the facility covered by EPL 11815? If so, could you please provide the contact details of Deanne (email, telephone), or if not could you please provide the details of an alternate contact.

Kind regards

Rebecca O'Rourke – Ecologist and Spatial Analyst
Molino Stewart Pty Ltd
Suite 3, Level 1

20 Wentworth St, Parramatta
PO Box 614
Parramatta CBD BC
Parramatta, NSW 2124
Switch: 02 9354 0300
Direct: 02 9354 0301
rorourke@molinostewart.com.au

During the current CoVID-19 outbreak Molino Stewart staff are working remotely but continue to be available to meet your project needs. Please contact me directly on my mobile number above or to speak to other staff ring the switch number and follow the prompts.

[MOLINO STEWART: Environment & Natural Hazards](#)



Celebrating 25 years 1995-2020



ref:_00D7F6iTix._5007F14baDY:ref

This email is intended for the addressee(s) named and may contain confidential and/or privileged information.
If you are not the intended recipient, please notify the sender and then delete it immediately.
Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Environment Protection Authority.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

Rebecca O'Rourke

From: Shireen Baguley
Sent: Tuesday, 10 November 2020 6:58 PM
To: chris.ritchie@planning.nsw.gov.au
Cc: Rebecca O'Rourke
Subject: Widemere Recycling Facility - Independent Environmental Audit

Dear Chris

I write to you as one of the relevant agencies to be consulted in our Independent Environmental Audit of the Widemere Recycling Facility. I provide further information for easy reference for you below.

Background

Boral Resources (NSW) Pty Ltd (hereafter referred to as Boral) operates the Widemere Construction and Demolition Recycling Facility (hereafter referred to as Widemere Facility) located at 38 Widemere Road, Wetherill Park NSW 2164 (Lot 4001, DP 1173524), in the Fairfield Local Government Area (LGA). The facility produces a range of building and construction products by separating, crushing and blending recovered construction and demolition (C&D) wastes with quarry products.. The facility is licensed by the *NSW Environment Protection Agency* (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act), Environmental Protection Licence (EPL) number 11815 (EPL 11815).

The site was formerly a quarry between 1924 and 2002. From approximately 1975 to 1997 there was an asphalt plant and associated stockpiling operations at the site. Stockpiling of gravel and other construction materials continued from 1997 to 2002.

In 2002, Development consent (DA 21-1-2002-i) was granted under the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act) by the Minister for Planning. The consent was issued for the construction and operation of the facility, including processing of up to 600,000 tonnes per annum (tpa) of construction and demolition material. The consent was modified in 2005 (MOD-126-8-2005-i) to increase the processing capacity to 750,000 tpa, increase hours of operation and modify processing operations to include a blending plant.

A new application was submitted in 2015 under Part 4.1 of the EP&A Act for State significant development (SSD). Development consent SSD-6525 was granted 25 November 2016 for the facility to receive and process up to 1 million tpa (Mtpa) of non-putrescible construction and demolition waste.

Operating since 2002, the site acts as Boral's largest recycling centre in NSW, servicing the building industry's increasing demand for this type of product.

The approval was conditional on the adherence of the project to the conditions of consent outlined in the Project Approval.

Audit requirements

To meet its post approval conditions, Boral requires an independent and suitable qualified contractor to assemble an audit team and undertake an independent environmental audit of the Widemere Facility. Schedule D (Condition D7) of the approval states:

D7. Within 1 year of the date of this consent and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:

- a) Be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary*
- b) Led by a suitable qualified auditor, and include experts in fields specified by the Secretary;*
- c) Include consultation with the relevant agencies;*

- d) Assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under these approvals);
- e) Review the adequacy of any approved strategy, plan or program required under the above mentioned consents; and
- f) Recommend measures or actions to improve the environmental performance of the Development. And/or any strategy, plan or program required under these consents

Consultation

Molino Stewart has been engaged by Boral to undertake this audit. Accordingly, as one of the relevant agencies, as well as the determining authority, chris.ritchie@planning.nsw.gov.au we are contacting you to gain your input into this audit.

If you have any requirements or other information you wish to provide to have considered within this audit, could you please provide same to the undersigned by 20 November, 2020.

Should you have any questions or would like to discuss this matter further, please do not hesitate to let me know.

Best Regards,

Shireen Baguley - Principal

(Tuesday, Thursday, Friday)

Molino Stewart Pty Ltd

Suite 3, Level 1

20 Wentworth St, Parramatta, NSW 2150

PO Box 614, Parramatta CBD BC, 2124

Switch: 02 9354 0300

Direct: 02 9354 0306

Mobile: 0417 804 900

sbaguley@molinostewart.com.au

During the current CoVID-19 outbreak Molino Stewart staff are working remotely but continue to be available to meet your project needs. Please contact me directly on the number above or to speak to other staff ring the switch number and follow the prompts.

[MOLINO STEWART: Environment & Natural Hazards](#)



Celebrating 25 years 1995-2020



Certified Lead Environmental Auditor (125758)

Rebecca O'Rourke

From: Shireen Baguley
Sent: Thursday, 12 November 2020 4:19 PM
To: Ahmad Faizi
Cc: Rebecca O'Rourke
Subject: RE: Widemere Recycling Facility - Independent Environmental Audit

Hi Ahmad

Thank you for your response. We will consider the points you raise in our audit.

In regards to your last point, Boral makes available its environmental information at <https://www.boral.com.au/locations/boral-recycling-widemere-wetherill-park>. This includes the Independent Environmental Audit reports when they are finalised, so please monitor this website.

Best Regards,

Shireen Baguley - Principal

(Tuesday, Thursday, Friday)

Molino Stewart Pty Ltd

Suite 3, Level 1

20 Wentworth St, Parramatta, NSW 2150

PO Box 614, Parramatta CBD BC, 2124

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sbaguley@molinostewart.com.au

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Certified Lead Environmental Auditor (125758)

From: Ahmad Faizi <AFaizi@fairfieldcity.nsw.gov.au>
Sent: Wednesday, 11 November 2020 1:25 PM
To: Shireen Baguley <SBaguley@molinostewart.com.au>
Subject: RE: Widemere Recycling Facility - Independent Environmental Audit

Hi Shireen,

I write in response to your email below regarding Environmental audit of Bowral. Council Environmental Management Team considers the following matters to be included in the assessment scope:

- Asses prospect creek for contaminants
- Compliance with condition of consent and licence

- Air quality
- Noise
- Surface water assessment
- Waste management

A screening test under the thresholds in Applying SEPP 33 for dangerous goods was conducted. The assessment concluded that 'the facility would not be a hazardous or offensive development provided appropriate setbacks from hazardous materials storage areas are maintained. Assess the setbacks from hazardous materials storage.

Council would also like to review the auditor report once it is finalised.

Should you require further information, please don't hesitate to contact me.

Kind regards

Ahmad

Ahmad Faizi
Senior Environmental Health Officer
Environmental and Public Health Compliance

PO Box 21, Fairfield NSW 1860
P 9725 0276 | F 9757 4708 | M 0428 358 485
www.fairfieldcity.nsw.gov.au



From: Shireen Baguley <SBaguley@molinostewart.com.au>
Date: 10 November 2020 at 6:56:57 pm AEDT
To: Dolores Schembri <DSchembri@fairfieldcity.nsw.gov.au>
Cc: Rebecca O'Rourke <Rorourke@molinostewart.com.au>
Subject: Widemere Recycling Facility - Independent Environmental Audit

Dear Dolores

I write to you as one of the relevant agencies to be consulted in our Independent Environmental Audit of the Widemere Recycling Facility. I provide further information below.

Background

Boral Resources (NSW) Pty Ltd (hereafter referred to as Boral) operates the Widemere Construction and Demolition Recycling Facility (hereafter referred to as Widemere Facility) located at 38 Widemere Road, Wetherill Park NSW 2164 (Lot 4001, DP 1173524), in the Fairfield Local Government Area (LGA). The facility produces a range of building and construction products by separating, crushing and blending recovered construction and demolition (C&D) wastes with quarry products..

The facility is licensed by the *NSW Environment Protection Agency* (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act), Environmental Protection Licence (EPL) number 11815 (EPL 11815).

The site was formerly a quarry between 1924 and 2002. From approximately 1975 to 1997 there was an asphalt plant and associated stockpiling operations at the site. Stockpiling of gravel and other construction materials continued from 1997 to 2002.

In 2002, Development consent (DA 21-1-2002-i) was granted under the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act) by the Minister for Planning. The consent was issued for the construction and operation of the facility, including processing of up to 600,000 tonnes per annum (tpa) of construction and demolition material. The consent was modified in 2005 (MOD-126-8-2005-i) to increase the processing capacity to 750,000 tpa, increase hours of operation and modify processing operations to include a blending plant.

A new application was submitted in 2015 under Part 4.1 of the EP&A Act for State significant development (SSD). Development consent SSD-6525 was granted 25 November 2016 for the facility to receive and process up to 1 million tpa (Mtpa) of non-putrescible construction and demolition waste.

Operating since 2002, the site acts as Boral's largest recycling centre in NSW, servicing the building industry's increasing demand for this type of product.

The approval was conditional on the adherence of the project to the conditions of consent outlined in the Project Approval.

Audit requirements

To meet its post approval conditions, Boral requires an independent and suitable qualified contractor to assemble an audit team and undertake an independent environmental audit of the Widemere Facility. Schedule D (Condition D7) of the approval states:

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b) Led by a suitable qualified auditor, and include experts in fields specified by the Secretary;

c) Include consultation with the relevant agencies;

d) Assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under these approvals);

e) Review the adequacy of any approved strategy, plan or program required under the above mentioned consents; and

f) Recommend measures or actions to improve the environmental performance of the Development. And/or any strategy, plan or program required under these consents

Consultation

Molino Stewart has been engaged by Boral to undertake this audit. Accordingly, as one of the relevant agencies, we are contacting you to gain your input into this audit.

If you have any requirements or other information you wish to provide to have considered within this audit, could you please provide same to the undersigned by 20 November, 2020.

Should you have any questions or would like to discuss this matter further, please do not hesitate to let me know.

Best Regards,

Shireen Baguley - Principal

(Tuesday, Thursday, Friday)

Molino Stewart Pty Ltd

Suite 3, Level 1

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sbaguley@molinostewart.com.au

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Celebrating 25 years 1995-2020



Certified Lead Environmental Auditor (125758)

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