

# BARNETT & MAY

## **Benedict Waste Recycling Facility Mayfield West**

Independent Environmental Audit

Prepared for  
**Benedicts Recycling Pty Ltd.**

Client representative  
**Alycia Campbell**

Date  
**21 February 2020**

Rev 1



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Prepared by — K. Holmes		Date – 4/ 12/ 2019
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#### Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
0	Report issued to Client	K. Holmes	A. Wilkins	K. Holmes	4/12/2019
1	Final Report	K. Holmes	A. Wilkins	K. Holmes	21/2/2020

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# 1. Introduction

Benedict Recycling Pty Ltd (Benedict) is the operator of the Mayfield West Recycling Facility (SSD 7698) located at 1A McIntosh Drive, Mayfield West. Benedict was granted development consent for the Mayfield West Recycling Facility by the Department of Planning, Industry and Environment (DPIE) on 13 March 2018 allowing increased processing capacity from 90 000 tonnes per year to 315 000 tonnes per year of general solid waste (non-putrescible). The operations commenced on 25 September 2018.

The purpose of the audit, that was undertaken in accordance with the **Barnett and May's** proposal (dated 17 August 2019), was to determine if the compliance obligations contained in the Project Approval (SSD 7698) Part C, Conditions 13 and 14, which states:

*C13 - "Within 1 year of the commencement of operations, and every three 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:*

*(a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*

*(b) include consultation with the relevant agencies;*

*(c) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL(s) (including any assessment, plan or program required under these approvals);*

*(d) review the adequacy of strategies, plans or programs required under the abovementioned approval or licences; and*

*(e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or Program required un these consents.*

*Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.*

*C14 – Within three months of commissioning the audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the Audit Report.*

The Audit was commissioned on 4 September 2019. The site inspection was undertaken by Ken Holmes (Accredited Lead Auditor) of Barnett & May on 31 October 2019. The audit covered the period from 25 September 2018 to 30 September 2019 (the Audit Period).

## 1.1 Benedicts Waste Recycling Facility (Mayfield West)

The Benedicts Waste Recycling Facility is located at 1a McIntosh Drive, Mayfield West. The facility accepts wastes, seven days per week, for recycling including:

- building and demolition wastes (both commercial and domestic);
- green wastes;
- soils and clean fill;
- paper and cardboard wastes; and
- metals.


The wastes are separated for reuse and recycling. The facility also has a range of recycled sands, aggregates and mulch products for sale.

## 2. Definitions

Acronyms	Description
AER	Annual Environmental Review
AR	Annual Review
AQMP	Air Quality Management Plan
CCC	Community Consultative Committee
DPE	Department of Planning and Environment (former planning department name)
DPIE	Department of Planning, Industry and Environment.
EMS	Environmental Management System
EPA	NSW Environment Protection Authority
EPL	Environmental Protection License
IEA	Independent Environmental Audit
GMP	Groundwater Monitoring Program
LMP	Landscape Management Plan
OEH	NSW Office of Environment and Heritage
OEMP	Operational Environmental Management Plan
OTPM	Operational Traffic and Pedestrian Management Plan
PA	Project Approval
PIRMP	Pollution Incident Response Management Plan
SWCMP	Surface Water Characterisation and Mitigation Plan
SWVR	Surface Water Validation Report
WMP	Waste Management Plan (appendix to the OEMP)



### 3. Auditor Certification

Independent Audit Certification Form	
Development Name	Benedict's Waste Recycling Facility Mayfield West
Development Consent No.	SSD 7698
Description of Development	C&D Waste Recycling Facility
Development Address	1a McIntosh Drive, Mayfield West
Proponent	Benedict Recycling Pty Ltd
Operator Address	11 Narabang Way, Belrose NSW 2085
Title of Audit	Benedict Waste Recycling Facility Mayfield West Independent Environmental Audit
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> <li><i>The audit has been undertaken in accordance with relevant approval condition(s) and in general accordance with the auditing standard AS/NZS ISO 19011:2011 and in general conformance with the DPE's Independent Audit Post Approval Requirements (June 2018).</i></li> <li><i>The findings of the audit are reported truthfully, accurately and completely;</i></li> <li><i>I have exercised due diligence and professional judgement in conducting the audit;</i></li> <li><i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i></li> <li><i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i></li> <li><i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);</i></li> <li><i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i></li> <li><i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i></li> </ul> <p><i>Note.</i></p> <p><i>a) The Independent Audit is an 'environmental audit' for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p><i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	4 Baeckea Place, Frenchs Forest, NSW
Email Address	ken@baeckea.com.au
Auditor Certification (if relevant)	Exemplar Global 14065
Date	21 February 2020

### 3.1 Auditee Details

<b>Audit Title:</b>	<b>Benedict Waste Recycling Facility Mayfield West Independent Environmental Audit</b>
Site:	Benedict's Waste Recycling Facility Mayfield West
Client Contact:	Alycia Campbell
Position:	Environmental Compliance Officer
Client:	Benedict Recycling Pty Limited
Client Address:	11 Narabang Way, Belrose NSW 2085
Client Phone Number	0437 468 258
Client Email:	alycia@benedict.com.au
Audit Team:	Ken Holmes – Certified Lead Auditor
Auditor's Telephone:	0438 046 261
Auditor's Email:	ken@baeckea.com.au
Date of Site Visit	31 October 2019
Audit Scope:	The audit was undertaken as per the brief outlined in the Barnett and May proposal (dated 17 August 2019). As such, the audit provides an assessment of the compliance of the project with the conditions Consent SSD 7698.

## 4. Audit process

The audit process and methodology are summarised in this section, and comprised the following key undertakings:

- Preliminary planning activities
- Review of information and preparation of a compliance register (audit protocol / checklist)
- Site inspection and interviews:
  - Opening meeting
  - Site inspection
  - Review of relevant records
- Review of additional information provided after the site inspection
- Preparation of this audit report.

### 4.1 Preliminary activities

Off-site planning for the site audit comprised:

- Initial discussions with client representative, to organise the site inspection and access to audit documentation
- Prepare the audit compliance checklist
- Completion of a project specific Risk Assessment
- Review of online information
- Submission of a preliminary document / record request
- Consultation with relevant agencies.

#### 4.1.1 Approval of audit teams

Benedicts sought the Secretary's endorsement for the audit team to undertake this Independent Environmental Audit.

The Secretary approved the following team on 11 June 2019 (Appendix C):

- Ken Holmes – Certified Lead Auditor
- Adam Bishop – Surface Water Specialist

#### 4.1.2 Consultation with Agencies

The Auditor consulted with the following agencies during the audit planning stage:

- Department of Planning, Industry and Environment (DPIE);
- NSW Environment Protection Authority (EPA);
- Newcastle City Council (Council)

Emails were initially sent (via Email) to each of the above agencies advising them of the audit and the scope of the audit and inviting them to provide comments/requirements or specific environmental issues they required the audit to target. Where required (where no response was provided by the nominated stakeholder organisation, a follow up email was sent to repeat the invitation to provide input into the audit.



## 4.2 Information Review and Compliance Register

Prior to the site inspection the Auditor prepared a detailed audit checklist (spreadsheet) that was used to assess and track compliance. This spreadsheet formed the basis of the compliance register presented in the Appendices of this report.

## 4.3 Site audit

The site inspection component of the audit was undertaken on 31 October 2019.

### 4.3.1 Opening Meeting

Following site inductions, the opening meeting was held on-site. It was attended by the following personnel:

- Alycia Campbell (Environmental Compliance Officer)
- Heath Nowlan (Site Manager)
- Ken Holmes (Lead Auditor) – Barnett ad May.

Introductions were made, and the purpose and scope of the audit was outlined. An explanation of the audit process was communicated. That is, a site inspection, site interviews and detailed review of records in order to identify compliance with the approval conditions relevant to the current operations at the site.

### 4.3.2 Site Inspections

A initial tour of the site was undertaken by the Auditor, accompanied by Ms Campbell and Mr Nowlan. Subsequent detailed inspections of specific areas of the operation were subsequently undertaken. The site inspection included observation of:

- Site Access and Security;
- Weighbridge;
- Waste receival areas;
- Waste sorting areas;
- Waste Storage stockpiles;
- Fuel and dangerous goods storage areas;
- Equipment maintenance shed;
- Wheel wash; and
- Surface water management infrastructure.

### 4.3.3 Site Interviews

Audit interviews comprised of a series of meetings with:

- Alycia Campbell (Environmental Compliance Officer); and
- Heath Nowlan (Site Manager).

#### 4.3.4 Document review

Compliance related documents that were not available prior to, and during site discussions of, the audit, were requested to be provided following the audit. The Auditee's personnel assisted with the provision of documentation following the audit, through secure file transfer mechanisms. The key documents reviewed during this audit are listed in the Compliance Registers against specific conditions.

## 4.4 Reporting

The compliance register was completed using notes and observations recorded during the site inspection / interviews and review of appropriate documentation. The completed compliance register is presented in **Appendix B**. A summary of the non-compliances identified during this audit are provided in Table 5, Table 6 and Table 7. The audit criteria used to determine compliance for this audit is defined in Table 1.

*Table 1 - Compliance Assessment Matrix*

Assessment	Criteria
Compliance	<p>Compliance</p> <ul style="list-style-type: none"><li>The site complies with the requirements of applicable pre-operational Consent Conditions.</li><li>A judgment made by an auditor that the activities undertaken, and the results achieved fulfil the specified requirements of the audit criteria. While further improvements may still be possible, the minimum requirements are being met.</li></ul>
Non-Compliance	<p>Non-Compliance</p> <ul style="list-style-type: none"><li>Clear evidence has been collected to demonstrate the requirement has not been complied with and is within the scope of the audit.</li><li>Site displays little or no evidence of compliance with the requirements of the regulatory documentation.</li></ul> <p>Note: Where the auditor has not been able to collect enough verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of enough verification, the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. As the condition cannot be verified it is treated as a non-compliance.</p>
Not Triggered	<p>Not Applicable / Not Triggered</p> <ul style="list-style-type: none"><li>The respective condition / requirement was not activated within the scope of the audit.</li></ul>
Noted	A statement or fact, where no assessment of compliance is required.

Risk levels for each non-compliance identified have been assessed in accordance with Table 2.

*Table 2 - Risk Assessment Matrix*

Risk Level	Description
<b>High</b>	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
<b>Medium</b>	Non-compliance with: <ul style="list-style-type: none"> <li>• potential for serious environmental consequences, but is unlikely to occur; or</li> <li>• potential for moderate environmental consequences but is likely to occur.</li> </ul>
<b>Low</b>	Non-compliance with: <ul style="list-style-type: none"> <li>• potential for moderate environmental consequences, but is unlikely to occur; or</li> <li>• potential for low environmental consequences but is likely to occur.</li> </ul>
<b>Administrative non-compliance</b>	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).

## 5. Stakeholder Consultation

Table 3 - Summary of Stakeholder Inputs provides a summary of the Stakeholder Consultation undertaken by the Auditors.

*Table 3 - Summary of Stakeholder Inputs*

Department	Contact	Consultation Actions	Stakeholder Comments	Auditor Response
<b>NSW Department of Planning, Industry and Environment</b>	Heidi Watters – A/ Team Leader Compliance	<ol style="list-style-type: none"> <li>1. Email sent on date 16/9/2019</li> <li>2. Follow up email was sent on 1/11/2019.</li> <li>3. Email reply from DPIE on date 8/11/2019.</li> </ol>	<p>The Department inspected the Mayfield West Facility in June 2019 and identified several non-compliances with the consent (SSD 7698) (see attached email). Benedict have been addressing these non-compliances progressively over the past five months.</p> <p>There are still some outstanding matters in regard to groundwater and surface water monitoring, and it would be good if you may be able to provide comment on the progress of these matters.</p>	Ground and surface water issues were reviewed as part of this Independent Environmental Audit.
<b>Newcastle City Council</b>	NCC general enquiries email.	<ol style="list-style-type: none"> <li>1. Email sent on date 16/9/2019</li> <li>2. Follow up email was sent on 1/11/2019.</li> <li>3. No response has been received from Council.</li> </ol>	<b>No response was received from Council</b>	n.a.
<b>NSW EPA</b>	NSW EPA officer Leslie Tan	<ol style="list-style-type: none"> <li>4. Email sent on date 16/9/2019</li> <li>5. Email reply from EPA on date 1/11/2019.</li> </ol>	EPA has declined to provide comment to the Auditor.	n.a.

## 6. Statutory Compliance and Recommendations

Compliance with the Conditions of Consent and the Environment Protection Licence has been reviewed by assessing compliance against the various documentation related to project approval, as listed in section 2.2 of this report. The Compliance Register presented in Appendix B provides a detailed review of the compliance status of the site, including recommendations to address non-conformances.

### 6.1 Summary of Compliance Status

A summary of compliance with pre-operations statutory requirements is provided in Table 4 - Summary of Statutory Compliance. The number of conditions include sub-clauses within each approval document.

*Table 4 - Summary of Statutory Compliance*

Approval/ Licence	No. of Conditions	Compliance	Non- Compliance	Noted	Not Triggered
SSD 7698	291	183	31	2	75
Statement of Commitments	85	55	18	0	12
EPL 20771	89	41	8	17	23
Total	465	279	58	19	110

### 6.2 Non-Compliances and other recommendations

Non-compliances identified during the site inspection, interviews and document reviews are recorded in detail in the Compliance Registers in **Appendix B** and are summarised in Table 5, Table 6 and Table 7. Other recommendations are provided in 7. Recommendations have been made to address all identified Non-Compliances and other identified recommendations.





Table 5 - Non-Compliances – Project Approval 7689

No.	Condition	Observation	Recommendation	Risk Level
Schedule 2 Condition A27	The Applicant must ensure that all its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the Development.	While general environmental awareness training has been provided, that references the requirements of the Environment Protection License and the EPA's Construction Waste Guidelines, there is no specific training or instructions provided to staff or employees relating to compliance with this Consent.	<ol style="list-style-type: none"> <li>1. Update the environmental awareness training materials to include reference to the requirement to comply with the Project Approval. The training materials should identify key compliance obligations as they apply to workers and contractors.</li> <li>2. Update the driver induction form to include the transport related Project Approval obligations, including, for example the requirement that heavy vehicles to not access Werribi Street.</li> </ol>	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
Schedule 2 Condition B12	<p>From the commencement of operations, the Applicant must implement a Waste Monitoring Program for the development. The program must ensure that:</p> <p>(i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site.</p>	The requirement and process for ensuring that wastes controlled under a waste tracking system has appropriate documentation prior to acceptance on site has not been documented in the Waste Monitoring Plan.	1. Revise Section 5 of Appendix D of the OEMP to include process for ensuring that wastes controlled under a waste tracking system has appropriate documentation prior to acceptance on site.	Administrative non-compliance
Schedule 2 Condition B12	<p>(ii) staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste including asbestos.</p>	The requirement for and scope of waste load checking, and recording training is not covered by the Waste Monitoring Plan.	1. Revise Section 5 of Appendix D of the OEMP to include details of waste receipt and management training, including scope and frequency of training in the Waste Monitoring Program.	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
Schedule 2 Condition B15	The Applicant must: (a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and (b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area. Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.	<p>The OEMP (Section 4.10) describes pest and weed monitoring and control actions. During the site inspection, no pest issues were obvious, however some weeds were observed around the site boundaries.</p> <p>The OEMP specifies that weekly management inspections of the site will include monitoring for pests. No records of implementation of weed or pest inspections (as part of a routine site inspection) were available to the Auditor.</p> <p>No records of vermin eradication programs were available to the Auditor. Finding: NOT VERIFIED</p>	<p>1. Develop a weekly environmental compliance checklist for completion by site management that includes pest and weed inspections (Note that details of potential weed species and photographs would assist management in determining if weed eradication is required.</p> <p>2. Ensure that the weekly environmental inspection records are kept.</p>	Low
Schedule 2 Condition B24	All excess water from the truck wash and wheel wash is to be discharged into suitable holding tanks and removed from the facility for treatment at an appropriately licensed facility or via trade waste.	The existing wheel wash is not provided with a mechanism for pumping or storing excess wastewater. It is noted that the wheel wash water will accumulate sediment and the removal of that sediment will be required to ensure that the wheel wash is effective.	<p>1. design and install a system to allow the collection and temporary storage of temporary wastewater from the wheel wash.</p> <p>2. Ensure that wheel wash wastewaters are disposed of, off-site at an appropriately licensed facility.</p>	Low

No.	Condition	Observation	Recommendation	Risk Level
Schedule 2 Condition B25	<p>Prior to the commencement of operations, the Applicant must design, install and operate a surface water management system for the Development. The system must:</p> <p>(e) ensure vegetation within the sediment basin and perimeter drain has been removed and the surface water infrastructure has been sealed to prevent surface water infiltration to groundwater.</p>	<p>1. Maintenance of the perimeter drain has not been undertaken (removal of vegetation and re-sealing of the drain).</p>	<p>1. Undertake a detailed survey of the perimeter drain, identify all areas where vegetation has damaged the drain, or the drain has been otherwise compromised. Remove all the vegetation and reseal the drain.</p>	Medium
Schedule 2 Condition B28	<p>The surface water management system must be operated and maintained for the duration of the Development.</p>	<p>The surface water management system has not been maintained in accordance with the requirements of the Approval. Specifically, the removal of vegetation and maintenance of the perimeter drain.</p>	<p>1. Undertake a detailed survey of the perimeter drain, identify all areas where vegetation has damaged the drain or the drain has been otherwise compromised. Remove all of the vegetation and reseal the drain.</p> <p>2. Initiate a monthly environmental site inspection that covers all compliance issues under the Approval, including the surface water management system. Note that this should include the water treatment system (sumps and pumps).</p>	Medium

No.	Condition	Observation	Recommendation	Risk Level
Schedule 2 Condition B29	The Applicant must maintain the surface water management system to minimise the infiltration of surface water to groundwater. This includes inspecting the infrastructure monthly for cracking and vegetation break through, removing the vegetation and sealing the infrastructure. Any maintenance on the surface water management system must be undertaken by a suitably qualified and experienced person(s), a record of these works must be kept for the life of the Development.	The surface water management system has not been maintained in accordance with the requirements of the Approval. Specifically, the removal of vegetation and maintenance of the perimeter drain.	<ol style="list-style-type: none"> <li>1. Undertake a detailed survey of the perimeter drain, identify all areas where vegetation has damaged the drain or the drain has been otherwise compromised. Remove all of the vegetation and reseal the drain.</li> <li>2. Initiate a monthly environmental site inspection that covers all compliance issues under the Approval, including the surface water management system.</li> </ol>	Medium
Schedule 2 Condition B34	<p>Prior to the commencement of operations, the Applicant must prepare a Surface Water Characterisation and Mitigation Plan (SWCMP). The SWCMP must:</p> <p>(b) implement the most recent version of the SWCMP approved by the Secretary for the duration of the development.</p>	The SWCMP was not being fully implemented at the time of the Audit. For example the lack of maintenance of the perimeter drain.	1. Prepare and implement a monthly environmental compliance inspection checklist that provides a framework for on-going review of environmental compliance requirements.	Administrative non-Compliance
Schedule 2 Condition B35	Within six months of the commencement of operations and following the management measures being implemented as per SWCMP (Condition B33), the Applicant must provide a Surface Water Validation Report (SWVR) to the	Benedict failed to provide the SWVR to the DPIE within the six months timeframe specified in the approval. The endorsement letter requested that the report be provided to the Department by 31 August 2019.	Ensure that all studies and reports required by DPIE are submitted within the requested timeframes.	Administrative non-Compliance

No.	Condition	Observation	Recommendation	Risk Level
	satisfaction of the Secretary.	DPIE subsequently approved an extension of time for the submission of the SWVR to within one month of the fourth sampling event.		
Schedule 2 Condition B42	As a minimum, the Applicant must ensure the 40,000 litre self-bunded diesel tank is managed as follows:  (b) the tank must be installed in accordance with the relevant Australian Standards, must be above ground and be protected against impact from heavy vehicles;	The fuel tank has not been provided with impact protection from heavy vehicles.	1. Install bollards (that meet the requirements of AS3845) to permanently separate heavy vehicles from the fuel tank installation.	Medium
	(e) hoses used for transfer of diesel must be inspected weekly;	No weekly inspections of the fuel tank installation are documented.	1. Prepare and implement a weekly environmental compliance inspection checklist covering the fuel storage area.	Medium
	(h) the diesel tank and re-fueling area must be bunded within an area of impervious hardstand; and	While the tank is located within a bunded area, heavy plant is refueled outside of the bund.	1. Install a bund (or catch drain) around the refueling pad to ensure that any spills occurring during refueling can be fully contained.	Medium
	(i) a diesel spill kit must be stored in the refueling area and deployed in the event of a spill.	The spill kit provided for the diesel fuel storage area was not properly provisioned.	1. Replenish the spill kit at the Diesel storage area. 2. Prepare and implement a weekly environmental compliance inspection checklist	Medium



No.	Condition	Observation	Recommendation	Risk Level
			that covers spill kit inspection.	
Schedule 2 Condition B43	To ensure that chemical spills and fire-water are contained on-site, prior to the commencement of operations and to the satisfaction of FRNSW, the Applicant must ensure:	<p>The emergency response plan provides guidance in case of fire and requires that the value on the discharge point to the sedimentation basin be kept close to allow fire waters to be contained.</p> <p>No correspondence from FRNSW was available to the auditor endorsing the chemical or firewater containment capability at the site.</p>	1. Contact FRNSW and seek approval for containment of fire water.	Administrative non-Compliance
	(a) a stormwater isolation valve is installed; the stormwater isolation valve must be closed at all times unless stormwater is being discharged and its closure must be monitored weekly;	There is no weekly inspection of the sedimentation pond discharge valve.	1. Prepare and implement a weekly environmental compliance inspection checklist that includes weekly checks on the sediment pond outlet valve.	Medium
Schedule 2 Condition B44	The Applicant must implement all reasonable and feasible measures to minimise the impact on the site's access road and any impacts on 1 McIntosh Drive, Mayfield West (Lot 16 in DP 270249).	A review of the Driver Induction form found no reference to traffic management relating to the site access road or 1 Macintosh Drive.	1. Update the Driver induction materials to fully cover the requirements for minimising impacts on the site access road or 1 Macintosh Drive.	Administrative non-Compliance

No.	Condition	Observation	Recommendation	Risk Level
Schedule 2 Condition B46	All customers are not permitted to leave their vehicles anywhere on the site other than the public unloading area and to access the pedestrian walkways between marked car parking spaces and the weighbridge and office area.	<p>Traffic and pedestrian management is detailed in Appendix G of the OEMP. All members of the Public (including contractors) are provided with the Driver Induction on arriving at the weighbridge.</p> <p>Neither the induction form or Driver Code of Conduct specifies that members of the public using the facility are not permitted to leave their vehicles anywhere on the site other than the public unloading area.</p>	<p>1. Include the key traffic safety requirements that relate to members of the public using the site in an appropriate information pamphlet / induction form for members of the public using the facility. The existing Driver Induction and Visitor Induction are not the appropriate documents as they are not applicable to members of the general public.</p> <p>2. Update the site entrance signage to inform members of the public that they are not permitted to exit their vehicles, except to unload in the public, hand unloading area.</p>	Administrative non-Compliance
Schedule 2 Condition B49	<p>The Applicant must ensure that:</p> <p>(d) the Development does not result in any vehicles queuing on the public road network or along the sites access road owned known as 1 McIntosh Drive, Mayfield West (Lot 16 in DP 270249) which is subject to a right of carriageway.</p>	Trucks were observed to be parked up while queuing on the site access road.	1. Investigate the reasons for queuing and options to prevent queuing of trucks on the site access road.	Administrative non-Compliance

No.	Condition	Observation	Recommendation	Risk Level
Schedule 2 Condition B51	The Applicant must  (b) implement the most recent version of the OTPMP approved by the Secretary for the duration of the development.	The OTPMP specifies that, in accordance with this approval, truck must not queue on the site access road. Additionally, the Driver Induction does not cover all of the information contained in the Driver's Code of Conduct. However the Code of Conduct is not provided to all heavy vehicle accessing the site.	1. Refer to Condition B49 (d) 2. Provide all heavy vehicle operators using the site with a copy of the Drivers Code of Conduct as part of the Site Induction process.	<b>Administrative non-Compliance</b>
Schedule 2 Condition B54	All reasonable steps must be taken to minimise dust generated during all works authorised by this consent.	Further dust mitigation actions are required to ensure that dust generation can be controlled on the site. For example: a) ensuring that all stockpiles and screening are provided with appropriate water sprays. B) that internal roads are cleaned (swept) to reduce soil / mud loads.	1. Review dust management actions including stockpile water sprays and sweeping of internal roads.	<b>Low</b>
Schedule 2 Condition B55	The Applicant must ensure that:  (h) all operations and activities occurring at the Development must be carried out in a manner that minimises the emissions of air pollutants from the Development;	Further dust mitigation actions are required to ensure that dust generation can be controlled on the site. For example: a) ensuring that all stockpiles and screening are provided with appropriate water sprays. B) that internal roads are cleaned (swept) to reduce soil / mud loads.	1. Review dust management actions including stockpile water sprays and sweeping of internal roads.	<b>Low</b>

No.	Condition	Observation	Recommendation	Risk Level
Schedule 2 Condition B58	The Applicant must: (a) not commence the operations until the AQMP required by Condition B57 is approved by the Secretary; and (b) implement the most recent version of the AQMP approved by the Secretary for the duration of the development.	<p>The AQMP (that forms part of the OEMP) has been prepared and was Approved by DPE on 25 September 2018. The expanded site operations commenced on 27 September 2018.</p> <p>The AQMP was not being fully implemented at the time of the Audit.</p>	1. Ensure that all air quality mitigation measures contained in the AQMP are implemented.	Low
Schedule 2 Condition B69	The Applicant must:  (b) minimise the noise impacts of the Development during adverse meteorological conditions;	<p>There is no definition of "adverse metrological conditions" and no specific control actions proposed in the OEMP to deal with noise mitigation during adverse weather conditions.</p> <p>The Auditor could not verify compliance with this Condition.</p>	<p>1. Develop an appropriate definition of "adverse metrological conditions". This should include wind speed and direction criteria.</p> <p>2. Identify the actions to be taken to minimise noise impacts on the identified sensitive receivers and update the Section 4.8 of the OEMP.</p>	Low
	(d) regularly assess noise emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.	There are no routine environmental inspections (daily or weekly) undertaken at this facility. While quarterly noise monitoring is scheduled, that monitoring is not sufficient to guide day to day activities on site.	<p>1. Prepare a daily "environmental inspection checklist" for site management to complete. Include noise generation and noisy work locations.</p> <p>2. Provide training to site management / supervisors in assessing (by observation) noisy activities that may result in excessive noise emissions and noise mitigation strategies.</p>	Low

No.	Condition	Observation	Recommendation	Risk Level
Schedule 2 Condition B72	<p>Prior to the commencement of operations, the final design of the development must be finalised (and include):</p> <p>(c) the arrangement of stockpiles of combustible material, stored externally, on the allotment be sufficiently separated to permit FRNSW vehicle access between stockpiles;</p>	At the time of the Audit clear access to all potentially combustible stockpiles was not maintained.	1. Ensure that all potentially combustible stockpiles are adequately separated to prevent the spread of fire and to allow clear access to FRNSW vehicles directly to the Stockpile.	Medium
Schedule 2 Condition B83	The Applicant must consult with the community regularly throughout the Development, including consultation with the nearby, adjacent landowners, sensitive receivers, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders.	There are no plans by Benedict to commence regular consultation with interested parties. Condition B83 is however vague and it is unclear as to the intention of this Condition, in particular the triggers for and frequency of consultation.	1. See clarification the intent of Condition B83 from DPIE as the triggers for consultation	Administrative non-Compliance
Schedule 2 Condition C5	The Applicant must carry out the construction of the Development in accordance with the OEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	All elements of the OEMP and Subplans were not being implemented at the time of the Audit.	1. Refer to the non-compliance recommendations above.	Administrative non-Compliance

No.	Condition	Observation	Recommendation	Risk Level
Schedule 2 Condition C11	Within seven days of the date of this incident, the Proponent must provide the Secretary and any relevant agencies with a detailed report on the incident.	Following the receipt of the dust complaint from the EPA, Benedict investigation the incident and prepared and issued a report to the EPA.  The incident was not reported to and subsequent report was not issued to DPIE.	1. Ensure that all environmental and compliance related incidents are reported to DPIE.	Administrative non-Compliance
Schedule 2 Condition C15	The Applicant must: (a) make copies of the following publicly available on its website: (i) the documents referred to in Condition A2;	This condition requires Benedict to upload copies of the following Documents: a) Conditions of Consent - these are contained in the OEMP that has been uploaded to the Website. b) EIS - a copy of the EIS <b>had not been</b> uploaded to the Website at the time of the audit. c) RTS (Appendix A to the Approval) - uploaded to the Website d) Amended Application (Appendix A to the Approval) - uploaded to the Website e) Management and Mitigation Measures (Appendix B to the Approval) - uploaded to the Website.	1. Upload a copy of the EIS to the Benedict Website.	Administrative non-Compliance
	(iii) all approved strategies, plans and programs required under the conditions of this consent;	The OEMP and all subplans have been uploaded to the Website, except the Landscape Management Plan. The version of the OEMP does not contain the LMP at Appendix J.	1. Upload a copy of the LMP to the Benedict Website.	Administrative non-compliance



Table 6 - Non-compliances Statement of Commitments

No.	Condition	Observation	Recommendation	Risk Level
Appendix B Rubbish and light waste	The access road between McIntosh Drive and the recycling facility site will be inspected daily to ensure that there is no rubbish is left along the access road (most likely food and beverage waste from drivers).	No daily environmental inspections are undertaken.	1. Prepare and implement a weekly environmental compliance inspection that access road litter.	Low
	The site boundary fences will be inspected daily and any wind-blown light waste within the site will be removed and sent to the main processing shed.	No daily environmental inspections are undertaken.	1. Prepare and implement a weekly environmental compliance inspection that covers on-site litter.	Low
	Any rubbish found along the access road between McIntosh Drive and the recycling facility site will be removed promptly.	No daily environmental inspections are undertaken.	1. Prepare and implement a weekly environmental compliance inspection that covers on-site litter.	Low
Appendix B Greenhouse Gases	<p>The following management measures will continue to be implemented to minimise greenhouse gases emissions:</p> <ul style="list-style-type: none"> <li>energy efficiency will be progressively reviewed and, where necessary, changes will continue to be implemented throughout the life of the operations.</li> </ul>	An energy efficiency review has not been undertaken.	1. Prepare and implement an energy efficiency review.	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
Appendix B Noise	<p>The following management measures will continue to be implemented to minimise noise emissions:</p> <ul style="list-style-type: none"> <li>• machinery will be correctly operated and maintained. Regular noise monitoring is conducted by the Site Leading Hand /Supervisor and any noise complaints received are referred to the Site Leading Hand /Supervisor and to the Site Manager.</li> </ul>	<p>There are no routine environmental inspections (daily or weekly) undertaken at this facility. While quarterly noise monitoring is scheduled, that monitoring is not sufficient to guide day to day activities on site.</p>	<ol style="list-style-type: none"> <li>1. Prepare a daily "environmental inspection checklist" for site management to complete. Include noise generation and noisy work locations.</li> <li>2. Provide training to site management / supervisors in assessing (by observation) noisy activities that may result in excessive noise emissions and noise mitigation strategies.</li> </ol>	Low
Appendix B Traffic	<p>Site generated traffic will continue to be formally directed to continue to travel only via Steel River Boulevard and McIntosh Drive when travelling within the Steel River estate.</p> <p>Benedict Recycling will continue to maintain the access road between McIntosh Drive and the Recycling Facility site in a fit and proper condition and to a suitable standard, repairing it when required at no cost to Ausgrid. This will include repairing any minor areas of surface rutting using 50 mm hot mix asphalt.</p> <p>Trucks will not be allowed to queue on the access road between McIntosh Drive and the Recycling Facility</p>	<p>Traffic entering the site use Steel River Boulevard and McIntosh Drive</p> <p>At the time of the Audit trucks were queued on the site access road.</p>	<ol style="list-style-type: none"> <li>1. Investigate the reasons for queuing and options to prevent queuing of trucks on the site access road.</li> <li>2. Provide all heavy vehicle operators using the site with a copy of the Drivers Code of Conduct as part of the Site Induction process.</li> </ol>	Low

No.	Condition	Observation	Recommendation	Risk Level
	site.			
Appendix B Water	<p>The site soil and water management system includes:</p> <ul style="list-style-type: none"> <li>• sock filters treating runoff prior to discharge into the perimeter drain;</li> </ul>	The required sock filters were not in place.	1. install (and maintain) sock filters along the inside edge of the perimeter drain.	Low
	<p>The following actions will be taken as part of the proposal:</p> <ul style="list-style-type: none"> <li>• the trees will be removed from the perimeter drain and the perimeter drain will be sealed;</li> </ul>	1. Maintenance of the perimeter drain has not been undertaken (removal of vegetation and re-sealing of the drain).	1. Undertake a detailed survey of the perimeter drain, identify all areas where vegetation has damaged the drain or the drain has been otherwise compromised. Remove all of the vegetation and reseal the drain.	Medium
	<ul style="list-style-type: none"> <li>• the sealed perimeter drain and final sedimentation basin will be inspected monthly to ensure that vegetation is not growing through the seal. If vegetation is found to be growing through the sides of the drain or basin, it will be removed and the seal repaired;</li> </ul>	No weekly or monthly inspections of the surface water management system are undertaken and documented.	1. Prepare and implement a weekly and monthly environmental compliance inspection checklist covering the surface water management system.	Medium
	<ul style="list-style-type: none"> <li>• the sealed segregated heavy waste processing and stockpiling area will be routinely swept using a sweeper.</li> </ul>	External storage areas are not regularly mechanically swept.	1. Review dust management actions including stockpile water sprays and sweeping of internal roads.	Low

No.	Condition	Observation	Recommendation	Risk Level
Appendix B Soil and Contamination	plant maintenance will only occur in sealed areas where spills, should they occur, will be contained and cleaned up immediately using a spill response kit;	The fuel tank has not been provided with impact protection from heavy vehicles.	1. Install bollards (that meet the requirements of AS3845) to permanently separate heavy vehicles from the fuel tank installation.	Medium
	maintenance activities that may result in the loss of fluids will be conducted within a shed with a sealed floor and at least 5 m from the nearest open doorway.	No weekly inspections of the fuel tank installation are documented.	1. Prepare and implement a weekly environmental compliance inspection checklist covering the fuel storage area.	Low
	tanks, vents and fittings will be inspected regularly and valves will be regularly overhauled (at periods not exceeding 10 years); and	No weekly inspections of the fuel tank installation are documented.	1. Prepare and implement a weekly environmental compliance inspection checklist covering the fuel storage area.	Low
	there will be regular inspections of the tank and surrounds and any liquid inside the bunded areas will be removed as soon as practicable following established procedures.	No weekly inspections of the fuel tank installation are documented.	1. Prepare and implement a weekly environmental compliance inspection checklist covering the fuel storage area.	Low
	the tank will be enclosed by Colourbond (or similar) walls to prevent leaks in the site of the tank spraying outside of the bund;	The tank installation is not enclosed by walls.	1. Install walls around the tank to prevent any leaks from spraying outside of the bunded area. Note that if the containment area is increased to include the refueling area, the installation of walls may not be required.	Low

No.	Condition	Observation	Recommendation	Risk Level
Appendix B Soil and Contamination	<ul style="list-style-type: none"> <li>Refueling: - mobile plant will be refueling within a bunded area with runoff from within the bund reporting to a oil-water separator;</li> </ul>	While the tank is located within a bunded area, heavy plant is refueled outside of the bund.	1. Install a bund (or catch drain) around the refueling pad to ensure that any spills occurring during refueling can be fully contained.	Medium
	there will be a diesel spill kit stored at the bowser; and	The spill kit provided for the diesel fuel storage area was not properly provisioned.	1. Replenish the spill kit at the Diesel storage area. 2. Prepare and implement a weekly environmental compliance inspection checklist that covers spill kit inspection.	Medium
	in the case of a spill, used absorbent material will be disposed at an appropriately licensed waste facility.	The spill kit provided for the diesel fuel storage area was not properly provisioned.	1. Replenish the spill kit at the Diesel storage area. 2. Prepare and implement a weekly environmental compliance inspection checklist that covers spill kit inspection.	Medium

Table 7 - Non-compliances EPL 20771

No.	Condition	Observation	Recommendation	Risk Level
O3.1	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.	Further dust mitigation actions are required to ensure that dust generation can be controlled on the site. For example: a) ensuring that all stockpiles and screening are provided with appropriate water sprays. B) that internal roads are cleaned (swept) to reduce soil / mud loads.	1. Review dust management actions including stockpile water sprays and sweeping of internal roads.	Low
O5.1	A litter management program must be implemented, which includes litter patrol to ensure that the local amenity is not degraded.	No routine environmental inspections are undertaken.	1. Prepare and implement a weekly environmental compliance inspection that covers on-site litter.	Low
O5.3	Bunds must: a) have walls and floors constructed of impervious materials; b) be of sufficient capacity to contain 110% of the volume of the tank (or 110% volume of the largest tank where a group of tanks are installed); c) have floors graded to a collection sump; and d) not have a drain valve incorporated in the bund structure, or be constructed and operated in a manner that achieves the same environmental outcome.	The bund meets the requirements of this Condition except that it is does not have a sump from which spilt materials can be recovered.	1. Upgrade the existing fuel bund to provide at least 30,000 litres capacity and to include a sump for the collection of spilt materials.	Low



No.	Condition	Observation	Recommendation	Risk Level
O5.5	The surface water management system must be maintained to minimise the infiltration of surface water to groundwater. This includes inspecting the surface water infrastructure monthly for cracking and vegetation breakthrough, removing the vegetation and sealing the surface water infrastructure.	1. Maintenance of the perimeter drain has not been undertaken (removal of vegetation and re-sealing of the drain).	1. Undertake a detailed survey of the perimeter drain, identify all areas where vegetation has damaged the drain or the drain has been otherwise compromised. Remove all of the vegetation and reseal the drain.	Medium
O6.2	Waste collected at the premises that is unable to be recycled, must not be stored at the premises and must be taken to a lawful waste facility at least once a week.	The OEMP and WMP do not require that residual wastes must not be stored for more than one week. No guidance is provided to employees in regards to waste holding times (in those referred to in Condition O6.2).	1. Revise the OEMP and WMP to include reference to maximum waste holding times for both approved wastes and non-conforming wastes that may be inadvertently accepted.	Administrative non-compliance
M6.2	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.	The sign at the front gate does not promote a "Complaints Telephone" Number.  The website does not reference telephone complaints line for the Mayfield West Recycling Facility.	1. Add details of the telephone complaints line to the website.	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
R4.1	<p>A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the quarterly monitoring. The assessment must be prepared by a suitably qualified and experienced acoustical consultant and include:</p> <p>a) as assessment of compliance with noise limits for R5,R9 and R12; and</p> <p>b) an outline of any management actions taken within the monitoring period to address any exceedances of the noise limits for R5, R9 and R12.</p>	<p>The required noise compliance assessment reports have been provided to the EPA . However, all reports were provided to the EPA after the 30 day period specified in this condition.</p>	<p>1. Ensure that all noise compliance assessment reports are provided to the EPA within the 30 day time limit.</p>	<p><b>Administrative non-compliance</b></p>

## 7. Independent Audit Post Approval Requirements

This audit focused on the pre-operational compliance requirements established by the Conditions of Approval. While the scope of the audit, as specified in the Conditions of Consent do not refer specifically to the DPIE Independent Audit Post Approval Requirements (DPIE, June 2018), for completeness the Audit has, where possible assessed the environmental performance of the project.

### 7.1 Project Environmental Management System

Benedict Recycling does not operate under a formal Environmental Management System (EMS). While the implementation of a formal EMS does not guarantee that an organisation will achieve high levels of environmental compliance, Benedict Recycling would benefit from the implementation of more structure around managing environmental compliance obligations.

The relatively high number of non-compliances identified in this audit also indicate that there is insufficient environmental resourcing allocated to this operation. Benedict Recycling has one full time environmental resource (shared across multiple facilities) and therefore rely on site management to manage their environmental compliance obligations.

Where site management have limited access to environmental resources the level of environmental expertise required by site management increases significantly. The required level of environmental understanding was not apparent during the audit.

It is recommended that a more detailed review of the environmental management of the facility be undertaken, however as a minimum, the following environmental management system elements should be developed and implemented at the facility:

1. Environmental Resourcing: an experienced environmental officer should allocate on average one week per month to the site for site inspections, compliance reviews, training and provision of support to site management.
2. Training: prepare a detailed environmental awareness training course (site specific) and provide to all site staff. This training should cover all of the key environment risk and compliance obligations and needs to updated (including training) annually.
3. Procedures – prepare simple procedures to cover:
  - a. Complaints management
  - b. Environmental monitoring and inspections
  - c. Environmental Monitoring and reporting
4. Environmental Checklists and inspections – prepare a weekly and monthly environmental checklist that cover all of the environmental requirements of the approval documents and the OEMP.
5. Environmental Records – establish a system to maintain the following records:
  - a. External Audits / Compliance
  - b. Environmental Training
  - c. Routine site inspections (and actions)
  - d. Complaints
  - e. Incidents
  - f. Water Monitoring Results
  - g. Dust Monitoring Results
  - h. Noise Monitoring Results

## 7.2 Implementation of the Operational Environmental Management Plan and Sub-plans

The Conditions of Approval required the preparation and implementation of the following management plans:

- Air Quality Management Plan;
- Groundwater Monitoring Program;
- Landscape Management Plan;
- Operational Environment Management Plan
- Operational Traffic and Pedestrian Management Plan
- Surface Water Characterisation and Mitigation Plan;
- Waste Monitoring Plan; and
- Waste Monitoring Program.

During the document review phase of the project the contents of each of the plans was reviewed and found, with some exceptions (e.g. the Waste Monitoring Program) to generally meet the requirements of the Approval. The Plans and Programs adequately identified the relevant project risks and proposed appropriate risk management controls.

However, it was noted that some of the non-compliances identified during the audit were related to the implementation of the Plans. For example, the drain maintenance requirements of the Surface Water Characterisation and Mitigation Plan were not being implemented. Details of the deficiencies in the implementation of plans and programs is provided in Section 6.

## 7.3 Status of Previous IEA Findings

This audit is the first Independent Audit of this Project, therefore there are no previous audit findings to review.

## 7.4 Specialist Auditor Reports

No specialist auditor reports were prepared as part of this audit.

## 7.5 Operational Environmental Impacts

The assessment of actual impacts against those predicted in the EIS is provided in Table 8

*Table 8 - Predicted vs Actual Impacts*

Category	Predicted Impact	Actual Impacts to Date
Air Quality	The incremental and cumulative particulate matter concentrations, dust deposition rates and odour concentrations generated by the proposal are well below the corresponding NSW EPA criteria at assessment locations.	When controlled the dust levels emitted from the site are not significant and have not impacted local communities. However, two instances of excessive dust generation have been recorded that resulted in complaints. Both of those instances were related to poor implementation of dust controls.
Greenhouse Gas	The EIS calculated annual emissions from the proposal for greenhouse gases (GHG) including CO <sub>2</sub> , CH <sub>4</sub> and N <sub>2</sub> O. Sources of GHG emissions from the proposal include diesel fuel (Scope 1), purchased electricity (Scope 2), upstream and downstream emissions and employee travel (Scope 3). The total annual GHG emissions estimated for the proposal are 415 t CO <sub>2</sub> -e/year. This represents 0.00025% and 0.00007% of annual NSW and Australian GHG emissions.	The quantity of Greenhouse gas emissions was not verified during this audit.
Noise	The proposal is predicted to have a negligible impact on the existing ambient acoustic environment (in isolation and cumulatively with other development) and is not predicted to increase industrial noise levels above the relevant amenity criteria.	All noise monitoring undertaken has found that noise from the facility is inaudible at the nearest residential receivers.
Traffic and Transport	The proposal will not have any impacts on parking, road safety and traffic management, public transport services, pedestrians or cyclists.	The audit found no evidence of increased traffic impacts. In particular no complaints relating to traffic associated with the facility have been received.
Visual	The EIS found that the proposal is unlikely to have significant visual impacts given that it is located within an existing industrial estate and is consistent with the visual character of the area. Partial views o	The facility is not visible from adjacent public roads or residences.
Surface Water	Use of this surface water will have a negligible impact on water reaching the Hunter River or flows in the river.	No water discharges have occurred during the audit period; therefore, no impacts have occurred.
Groundwater	The proposal will not intercept groundwater or have impacts on groundwater quality.	No groundwater impacts were identified during the audit.
Soil and Contamination	The site is largely sealed, exposed soils are generally vegetated, and no significant ground disturbing activities will be required. Therefore, little sediment generation from the existing ground surface is anticipated. However, should sediment be generated, it will report to the existing sedimentation pond via the drain surrounding the site.	No excavations have been undertaken on the site during the audit period, therefore no soil or contamination impacts have been identified.

Category	Predicted Impact	Actual Impacts to Date
Fauna	No threatened fauna species have been recorded on the industrial site. Given the lack of significant animal habitat present on the site, the occurrence of threatened fauna species is unlikely.	No reports of native animal interactions on the site have been recorded. No further habitat removal has occurred during the audit period.
Flora	<p>Extensive past modifications of the study area have effectively removed most native animal habitat. Some small areas of extant vegetation are proposed to be removed. However, this vegetation has minor habitat value and proposed landscape plantings will provide comparative replacement habitat.</p> <p>There are small areas of vegetation on the site that previously formed part of landscaping around Delta EMD offices and car parks. Generally, this vegetation will not be impacted by the proposal although some trimming may be required as there has been no management of this vegetation since closure of the site.</p>	No trimming of trees or vegetation removal has occurred during the audit period.
Heritage	The proposal site has been heavily modified and the potential for extant archaeological sites is extremely low. Further, the proposal will not impact on any extant sites as it does not involve earthworks.	No heritage impacts have been identified during the audit.

# Compliance Table



## Appendix A

**Compliance Table A1 – Planning Approval and Statement of Commitments**

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition A1		In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.					No evidence of material harm to the environment was identified during this Audit.	Compliance	
Schedule 2 Conditions A2 - A5	Terms of Consent								
Schedule 2 Condition A6	Limits of Consent	The Applicant must not receive or process on site more than 315,000 tonnes per year of general solid waste (non-putrescible).		<p>1. Annual Review Mayfield West Recycling Facility (SSD 7698) 13 March 2018 - 31 December 2018.</p> <p>2. Waste Tracker Weekly Reports (report from computerised waste receipt records system) from September 2018 to October 2019.</p> <p>3. Waste Management Plan Benedict Recycling Mayfield West Dated May 2018 (appendix to the OEMP).</p>	1. Interview (A. Campbell, Environmental Compliance Officer) - all wastes delivered to the site are weighed on entering the site and leaving the site.	1. Site Inspection 31 October 2019 - all trucks entering and leaving the facility during the site inspection accessed the site via the weighbridge and were weighed in entry and prior to exiting the site. The weighbridge operator was observed recording the weights of all loads on the (computerised) waste processing database system).	<p>The Annual Review stated that over the period from 18/03/2018 and 31/12/2018, 85334 tonnes of General Solid Wastes were received and processed at the Benedict Recycling Facility.</p> <p>A review of waste records (Waste Tracker Reports) for the 2019 Calendar year showed that year to date approximately 123,873 tonnes of general solid wastes have been received and processed at the facility.</p> <p>Waste receipt, inspection and record keeping procedures are detailed in Section 5 of the Waste Management Plan. Observations made during the audit verified that the general procedures detailed in the WMP were being implemented at the time of the audit.</p>	Compliance	
Schedule 2 Condition A7		The Applicant must not: (a) crush more than 71,000 tonnes per year of waste; and (b) shred more than 5,400 tonnes per year of timber.		<p>1. Annual Review Mayfield West Recycling Facility (SSD 7698) 13 March 2018 - 31 December 2018.</p> <p>2. Waste Tracker Weekly Reports (report from computerised waste receipt records system) from September 2018 to October 2019.</p>	1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the Audit Period.	<p>1. No crushing operations were observed during the site inspection.</p> <p>2. A stockpile of shredded timber was observed at the site during the site inspection.</p>	<p>No crushing has been undertaken at the facility during the Audit Period.</p> <p>The Annual Review stated that over the period from 18/03/2018 and 31/12/2018, 650 tonnes of timber wastes were shredded at the Benedict Recycling Facility.</p> <p>A review of waste records (Waste Tracker Reports) for the 2019 Calendar year showed that year to date approximately 4,899 tonnes of timber waste were shredded.</p>	Compliance	



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition A8		The amount of waste stored on site at any one time must not exceed 53,733 tonnes.		<p>1. Annual Review Mayfield West Recycling Facility (SSD 7698) 13 March 2018 - 31 December 2018.</p> <p>2. Waste Tracker Weekly Reports (report from computerised waste receipt records system) from September 2018 to October 2019.</p>	<p>1. Interview (A. Campbell, Environmental Compliance Officer)</p> <ul style="list-style-type: none"> <li>- The quantity of wastes stored at the site is determined by a weekly visual stocktake.</li> <li>- The soils currently stockpiled on the site area typically from construction and demolition sites and infrastructure projects</li> <li>- Area D. Mixed Waste (i) no contaminated soils. The soils stored in Area D are in the potentially contaminating waste area, as depicted in the consent in Appendix A. These soils have been classified as General Solid Waste and are checked against our licence limits, to ensure they meet the limits before being brought to our site.</li> <li>- The small tyre stockpile comes from mixed waste loads e.g. skip bins. Tyres are picked out of loads and kept together to be picked up by Tyrecycle for off-site disposal.</li> </ul>	<p>1. The following stockpiles of wastes were observed:</p> <ul style="list-style-type: none"> <li>- unsorted wastes on the waste receipt / processing floor (Photo #2)</li> <li>- timber (mainly pallets) north-western end of the site (near the final sedimentation basin) (photo #3)</li> <li>- uncrushed concrete (multiple stockpiles) in the north-western corner of the site (photo #3)</li> <li>- soil / mixed waste (multiple stockpiles) in Area D (photo #4)</li> <li>- timber (trees) in the southern section of Area D (photo #5)</li> <li>- shredded timber in Area D</li> <li>- mulch (southern end of Area D)</li> <li>- plasterboard / cement sheeting immediately to the east of the waste receipt shed (photo #6)</li> <li>- tyres (small stockpile) to the east of the waste receipt shed (Photo #7)</li> </ul>	<p>The Annual Review stated that over the period from 18/03/2018 and 31/12/2018, the maximum quantity of wastes stored on the site at any time was reported to be 16,075 tonnes .</p> <p>A review of waste records (Waste Tracker Reports) for the 2019 Calendar year showed that year to date the maximum quantity of wastes stored on the site at any time was reported to be less than 16,000 tonnes.</p> <p>The auditor estimated the area of the site where wastes are currently stored at the time of the site inspection was as circa 10,000 m<sup>2</sup>. This estimation assumed an average stockpile height of 1 m (stockpile heights ranged between 1 and 3 metres), over the entire potential storage area of 10,000 m<sup>3</sup> (excluding the sorting shed). At an average density for mixed waste of 225 tonnes /m<sup>3</sup> would equate to a total weight of wastes of approximately 22,500 tonnes.</p>	Compliance	
Schedule 2 Condition A9		This consent does not permit any areas of the site to be leased to third parties for storage purposes or approval of any portion of the site as a storage premises.			<p>1. Interview (A. Campbell, Environmental Compliance Officer) -there are no areas covered by the consent that are leased to third parties.</p>	<p>1. Third party waste bins are stored at the site (Photo 1), however they are not located on the parcel of land covered by the Consent.</p>	<p>There are no areas of the site being leased to third parties. Waste collection contractors, however, are provided with storage space for waste bins. The waste bin storage area is outside of the area covered by this Approval</p>	Compliance	
Schedule 2 Condition A10		The Applicant shall aim to achieve a recycling rate of 95% of all waste and a disposal rate of not more than 5% to landfill		<p>1. Annual Review Mayfield West Recycling Facility (SSD 7698) 13 March 2018 - 31 December 2018.</p> <p>2. Waste Recovery Rate Summary Report for the period 13 March 2013 to 31 December 2018.</p>			<p>The Annual Review stated that over the period from 18/03/2018 and 31/12/2018 that the waste recovery rate achieved was 79%. This figure was confirmed in Benedict Waste Recovery Summary Report for that period.</p> <p>Note that a compliance finding for this Condition is not applicable as the target of 95% waste recovery is not a specific performance limit.</p>	Noted	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition A11		Stockpiles of waste and recycled product on-site must not be more than seven (7) metres in height when measured from the finished ground level of the site.			1. Interview (H. Nowlan Site Manager)) -Three height stockpile markers have been installed around the site to provide a visual reference to site personnel.	1. Three stockpile height reference markers were sighted by the Auditor (Photo #8). All stockpiles on the site, at the time of the audit were below the 7.0 metre height limit.	At the time of the audit all stockpiles were well below the 7.0 metre height limit.	Compliance	
Schedule 2 Condition A12		Heavy vehicles are not permitted to access Werribi Street.			1. Interview (A. Campbell, Environmental Compliance Officer) Werribi Street is not accessible from the site. A sign at the site entrance instructs drivers that access to Werribi street is prohibited.	1. A sign at the site entrance instructs drivers that access to Werribi street is prohibited.	Werribi Street is not directly accessible from the site. A sign instructing drivers to avoid Werribi Street is located at the site entrance.	Compliance	
Schedule 2 Condition A13	Notification of Commencement	The date of commencement of each of the following phases of the Development must be notified to the Department in writing, at least one month before that date: (a) construction; (b) operation; (c) cessation of operations; and (d) decommissioning.		1. Email from J. Krick (Senior Planner EMM Consultants) to B. Zhang and K. Masters (DPIE) dated 27 July 2018 advising DPIE that the expanded operations would commence on 27 August 2018. 2. Email from H. Watters (Senior Compliance Officer DPIE) to J. Krick (EMM Consultants) dated 26 July 2019 acknowledging that the actual start date of the expanded operations was 27 September 2018.			The auditor sighted email correspondence between Benedict's planning consultant and DPIE advising of the initial proposed start date of 27 August 2018. It is noted that the actual start date for the expanded operations was 25 September 2018, following approval of the OEMP by DPIE.	Compliance	
Schedule 2 Condition A14		If the construction or operation or decommissioning of the Development is to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the Development to be carried out in that stage.		1. Audit Documentation Notes provided by A. Campbell, Environmental Compliance Officer.			No staging of the construction or operations of the expanded operations were requested by Benedict.	Not Triggered	
Schedule 2 Condition A15	Staging, Combining and Updating Strategies, Plans or Programs.	With the approval of the Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the Development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the Development).		1. Audit Documentation Notes provided by A. Campbell, Environmental Compliance Officer.			No staging of any plans related to the expanded operations were requested by Benedict.	Not Triggered	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition A16		If the Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.		1. Audit Documentation Notes provided by A. Campbell, Environmental Compliance Officer.			No staging of any plans related to the expanded operations were requested by Benedict.	<b>Not Triggered</b>	
Schedule 2 Condition A17		If approved by the Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.		1. Audit Documentation Notes provided by A. Campbell, Environmental Compliance Officer.			No staging of any plans related to the expanded operations were requested by Benedict.	<b>Not Triggered</b>	
Schedule 2 Condition A18	Requests for Information	The Applicant must retain all weighbridge records as required by the POEO (Waste) Regulation and for the life of the Development. The weighbridge records must be made immediately available on request by the Secretary and/or the EPA.		1. Annual Review Mayfield West Recycling Facility (SSD 7698) 13 March 2018 - 31 December 2018.  2. Waste Recovery Rate Summary Report for the period 13 March 2013 to 31 December 2018.		1. During the site inspection the Auditor observed the weighbridge operation recording incoming and outgoing vehicle details (including weight in and out) and recording that information on the Weighbridge computer system.	Weighbridge records were available to the auditor covering all of the Audit Period.	<b>Compliance</b>	
Schedule 2 Condition A19		The Applicant must retain waste classification records for all wastes received on the site and waste disposed from the site for the life of the Development. The waste classification records must be made immediately available on request by the EPA and/or the Secretary.		1. Letter from ESP Laboratory to Collaborative Construction Solutions Pty Ltd, titled "Stockpile Soil Assessment" Muswellbrook Marketplace Car Park, 22 Sowerby Street, Muswellbrook NSW 2333), dated 29 October 2019. The letter detailed the results of the testing and subsequent waste classification of the soil in accordance with the NSW EPA Waste Classification Guidelines.		1. The Auditor inspected the stockpiles of waste materials at the facility. 2. The Auditor viewed the Benedict waste database that records the source of waste, waste classification, waste volume of waste soils accepted at the site.	Benedict require the waste generators to provide waste classification reports for all soil / fill prior to delivery to the facility. The waste classification of each load is recorded on the Waste Register and contains the waste classification of the relevant materials delivered to the site. The system records waste classification results at least for the timeframe required by this Condition.	<b>Compliance</b>	
Schedule 2 Condition A20	Evidence of Consultation	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Secretary for approval; and (b) provide details of the consultation undertaken including: (i) a description of how matters raised by those consulted have been resolved to the satisfaction of both the Applicant and the party consulted; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.		1. Operational Environmental Management Plan, Revision 5, dated July 2018.			All consultation requirements have been met. Refer to Conditions below.	<b>Compliance</b>	

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition A21	Statutory Requirements	The Applicant must 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.	1. Planning Approval SSD 7698 2. Environment Protection Licence 20771			Benedict Recycling have obtained all of the approval and licences required to operate the facility.	Compliance	
Schedule 2 Condition A22	Structural Adequacy	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the Development, must be constructed in accordance with the relevant requirements of the BCA.	1. Construction Certificate NC160019-Stage 2 for the installation of roofing over the fuel storage area.		1. The only construction undertaken at the site since the granting of this Approval has been the installation of an awnings / roof over the fuel storage area.	The Construction Certificate for the fuel storage area awing confirms that the structure, as constructed meets the relevant standards and Council requirements.	Compliance	
Schedule 2 Condition A23		Prior to the commencement of the operations, the Applicant must obtain a Building Information Certificate from Council in accordance with Division 6.7 of the Environmental Planning and Assessment Act 1979. Note: • Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the Development.	1. Construction Certificate NC160019-Stage 2 for the installation of roofing over the fuel storage area.		1. The only construction undertaken at the site since the granting of this Approval has been the installation of an awnings / roof over the fuel storage area.	The Construction Certificate for the fuel storage area awing confirms that the structure, as constructed meets the relevant standards and Council requirements.	Compliance	
Schedule 2 Condition A24	Utilities and Services	Prior to the construction of any utility works associated with the Development, the Applicant must obtain relevant approvals from service providers	1. Audit Documentation Notes provided by A. Campbell, Environmental Compliance Officer.	1. No utility works were constructed / installed at the facility.		No utility works were constructed / installed at the facility.	Not Triggered	
Schedule 2 Condition A25	Protection of Public Infrastructure	Before the commencement of construction, the Applicant must: (a) consult with the relevant owner and provider of services that are likely to be affected by the Development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; (b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and (c) submit a copy of the dilapidation report to the Secretary and Council.	1. Dilapidation Report prepared by Benedict Recycling.			Benedict identified all public infrastructure (roads, drainage and power supply infrastructure) in the immediate vicinity of the facility. The dilapidation report identifies (and contains photographs of the identified public infrastructure) and determined that the development will not encroach or impact on that infrastructure.	Not Triggered	
Schedule 2 Condition A26		Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the Development; and (b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the Development.	1. Dilapidation Report prepared by Benedict Recycling.			Benedict identified all public infrastructure (roads, drainage and power supply infrastructure) in the immediate vicinity of the facility. The dilapidation report identifies (and contains photographs of the identified public infrastructure) and determined that the development will not encroach or impact on that infrastructure.	Not Triggered	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition A27	Compliance	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the Development.		1. Drivers Induction Form (Form 254.6) 2. Environmental Awareness Training (PowerPoint) Presentation, dated 11 November 2019. 3. Operational Environmental Management Plan, Revision 5, dated July 2018. 4. Training Record - "EPA Standards for Managing Construction Wastes"	1. Interview (A. Campbell, Environmental Compliance Officer) - environmental awareness training overviewing the PIRMP has been provided to all permanent employees. Training has also been provided covering the EPA's Construction Waste management guidelines.		While general environmental awareness training has been provided that references the requirements of the Environment Protection Licence and the EPA's Construction Waste Guidelines, there is no specific training or instructions provided to staff or employees relating to compliance with this Consent.	<b>Non Compliance</b>	1. Update the environmental awareness training materials to include reference to the requirement to comply with the Project Approval. The training materials should identify key compliance obligations as they apply to workers and contractors. 2. Update the driver induction form to include the transport related Project Approval obligations, including, for example the requirement that heavy vehicles to not access Werribi Street.
Schedule 2 Condition A28	Contributions to Council	Prior to the commencement of the operations, a contribution must be paid to Council in accordance with Section 7.12 of the EP&A Act, in particular the City of Newcastle Section 94A Development Contributions Plan 2009 (Updated July 2017) (adjusted on a quarterly basis (from the date of this consent), to account for movements in the Australian Bureau of Statistics Consumer Price Index – Building Construction (NSW)). A receipt for the payment to Council of the Section 7.12 Levy Contributions must be submitted to the Secretary prior to the commencement of the operations. Note: The Section 7.12 Levy as determined at the date of this consent is \$3938.69		1. The City of Newcastle Receipt for \$3949.12, dated 11 July 2018.			The required payment has been made to Council.	<b>Compliance</b>	
Schedule 2 Condition A29	Operation of Plant and Equipment	All plant and equipment used on site, or to monitor the performance of the development must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner				1. Dust suppression sprays observed (working)  1. Surface water drainage system adequate, although bunding around the fuel tank was only rough poured concrete - still satisfied containment volume requirement.		<b>Compliance</b>	



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition A30	Modification of Consent	Prior to the commencement of operations and in order for the development of land to proceed in a coordinated and orderly manner and to avoid potential conflicts with this consent, the Applicant must modify DA2015/0291 (described in Table 1) pursuant to Section 4.17(1)(b) of the Environmental Planning and Assessment Act 1979 and Clause 97 of the Environmental Planning and Assessment Regulation 2000 such that the recycling facility including acceptance of up to 90,000 tonnes per annum of waste (pre-classified general solid wastes (non-putrescible waste)) is removed from the development consent.		<p>1. Letter from EMM (Benedict's planning consultant) to Newcastle City Council titled "<i>Notice of modification of DA2015/0291 pursuant to Section 4.17(1)(b) of the Environmental Planning and Assessment Act 1979 and Clause 97 of the Environmental Planning and Assessment Regulation 2000</i>", dated 4 October 2018. The letter provided the statutory notification of modification as required under Clause 97 of the Regulation.</p> <p>2. Email from Newcastle City Council (Mr G Mansfield) to EMM Consulting (Ms J Krick), titled "RE: PB2018/11496: Revised Notice of Modification of DA/2015/0291, dated 12 November 2019. The email confirms that the DA has been modified to align with this Approval.</p>			<p>Benedict's planning consultants wrote to Council in October 2018 advising Council of the change in approved waste processing volume.</p> <p>Council have confirmed the formal amendment of the DA. .</p>	Compliance	
Schedule 2 Condition B1		All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.		1. Audit Documentation Notes provided by A. Campbell, Environmental Compliance Officer.	1. Interview (A. Campbell, Environmental Compliance Officer) -For the EPA we do WARRP reporting every month which is a report showing all tonnes received into the premises broken down into waste types, who and where they came from and the same for materials exported from site and where and who they went to, including other licensed facilities.		WARRP reporting to the EPA provides records of off-site disposal of wastes to appropriate (approved) facilities.	Compliance	
Schedule 2 Condition B2	Waste Management Statutory Requirements	Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal, except as expressly permitted by an EPL.		<p>1. Annual Review Mayfield West Recycling Facility (SSD 7698) 13 March 2018 - 31 December 2018.</p> <p>2. Waste Tracker Weekly Reports (report from computerised waste receipt records system) from September 2018 to October 2019.</p> <p>3. Waste Management Plan Benedict Recycling Mayfield West Dated May 2018 (appendix to the OEMP).</p>		1. The Auditor inspected all waste stockpiles and observed C&D, soils, concrete, packaging, pallets, some vegetation (woody waste), bricks...no liquids or asbestos observed.	Waste records reviewed and observations made by the Auditor did not identify any unapproved wastes.	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B3		The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.		<p>1. Annual Review Mayfield West Recycling Facility (SSD 7698) 13 March 2018 - 31 December 2018.</p> <p>2. Waste Tracker Weekly Reports (report from computerised waste receipt records system) from September 2018 to October 2019.</p> <p>3. Waste Management Plan Benedict Recycling Mayfield West Dated May 2018 (appendix to the OEMP).</p>	1. Interview (A. Campbell, Environmental Compliance Officer) - all wastes delivered to the site are weighed on entering the site and leaving the site.	1. Site Inspection 31 October 2019 - all trucks entering and leaving the facility during the site inspection accessed the site via the weighbridge and were weighed in entry and prior to exiting the site. The weighbridge operator was observed recording the weights of all loads on the (computerised) waste processing database system).	Waste receipt, inspection and record keeping procedures are detailed in Section 5 of the Waste Management Plan. Observations made during the audit verified that the general procedures detailed in the WMP were being implemented at the time of the audit.	Compliance	
Schedule 2 Condition B4		The Applicant must retain all sampling and waste classification data for the life of the Development in accordance with the requirements of the EPA.		1. Letter from ESP Laboratory to Collaborative Construction Solutions Pty Ltd, titled "Stockpile Soil Assessment" Muswellbrook Marketplace Car Park, 22 Sowerby Street, Muswellbrook NSW 2333), dated 29 October 2019. The letter detailed the results of the testing and subsequent waste classification of the soil in accordance with the NSW EPA Waste Classification Guidelines.		<p>1. The Auditor inspected the stockpiles of waste materials at the facility.</p> <p>2. The Auditor viewed the Benedict waste database that records the source of waste, waste classification, waste volume of waste soils accepted at the site.</p>	Benedict require the waste generators to provide waste classification reports for all soil / fill prior to delivery to the facility. The waste classification of each load is recorded on the Waste Register and contains the waste classification of the relevant materials delivered to the site. The system records waste classification results at least for the timeframe required by this Condition.	Compliance	
Schedule 2 Condition B5		No biochar production or storage is approved under the terms of this consent				1. The Auditor did not observe any biochar production or storage at the facility during the site inspection.	The Auditor did not observe any biochar production or storage at the facility during the site inspection.	Compliance	
Schedule 2 Condition B6	Waste Management Receipt, Storage and Handling of Waste	The Applicant must only receive waste on site that is authorised for receipt by an EPL.		<p>1. Annual Review Mayfield West Recycling Facility (SSD 7698) 13 March 2018 - 31 December 2018.</p> <p>2. Waste Tracker Weekly Reports (report from computerised waste receipt records system) from September 2018 to October 2019.</p> <p>3. Waste Management Plan Benedict Recycling Mayfield West Dated May 2018 (appendix to the OEMP).</p>		1. The Auditor inspected all waste stockpiles and observed C&D, soils, concrete, packaging, pallets, some vegetation (woody waste), bricks...no liquids or asbestos observed.	Waste records reviewed and observations made by the Auditor did not identify any unapproved wastes.	Compliance	
Schedule 2 Condition B7		The Applicant must ensure any waste generated on the site during construction and from general office activities is classified in accordance with the EPA's Waste Classification Guidelines, 2014 or its latest version, and disposed of to a facility that may lawfully accept the waste.		1. Audit Documentation Notes provided by A. Campbell, Environmental Compliance Officer.	1. No construction works, other than the erection of a roof /awning over the fuel storage area, were undertaken as part of this development. No construction waste materials were produced.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	Not Triggered	

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B8		Loads predominantly containing glass are not permitted to be crushed at the site.	<p>1. Annual Review Mayfield West Recycling Facility (SSD 7698) 13 March 2018 - 31 December 2018.</p> <p>2. Waste Tracker Weekly Reports (report from computerised waste receival records system) from September 2018 to October 2019.</p> <p>3. Waste Management Plan Benedict Recycling Mayfield West Dated May 2018 (appendix to the OEMP).</p>	<p>1. Interview (A. Campbell, Environmental Compliance Officer) - all wastes delivered to the site are weighed on entering the site and leaving the site. We follow Standards for managing construction waste in NSW and have a rejected loads register can be shown to you onsite (B8 standards)</p>	<p>1. The Auditor inspected all waste stockpiles and observed C&amp;D, soils, concrete, packaging, pallets, some vegetation )(woody waste), bricks...no liquids or asbestos observed.</p> <p>2. No stockpiles of glass were present at the site during the site inspection.</p>	Waste records reviewed and observations made by the Auditor did not identify any unapproved waste at the facility.	Compliance	
Schedule 2 Condition B9		The Applicant must: (a) implement auditable procedures to: (i) ensure the site does not accept wastes that are prohibited; and (ii) screen incoming waste loads. (b) ensure that: (i) all waste types that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; (ii) all waste received at the site must be recorded in accordance with clause 27 of the POEO (Waste) Regulation; (iii) details of the quantity, type and source of wastes received on the site must be provided to the EPA and the Secretary when requested; and (iv) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.	<p>1. Annual Review Mayfield West Recycling Facility (SSD 7698) 13 March 2018 - 31 December 2018.</p> <p>2. Waste Tracker Weekly Reports (report from computerised waste receival records system) from September 2018 to October 2019.</p> <p>3. Waste Management Plan Benedict Recycling Mayfield West Dated May 2018 (appendix to the OEMP).</p>	<p>1. Interview (A. Campbell, Environmental Compliance Officer) - all wastes delivered to the site are weighed on entering the site and leaving the site. We follow Standards for managing construction waste in NSW and have a rejected loads register can be shown to you onsite (B8 standards)</p> <p>2. weighbridge system captures all relevant info for every load</p> <p>3. Benedict maintain a rejected loads register</p>	<p>1. The Auditor viewed the Benedict waste database that records the source of waste, waste classification, waste volume of waste soils accepted at the site.</p> <p>1. Auditor viewed the Rejected Loads Register.</p>	Benedict maintain detailed records of all wastes received at the site including rejected waste loads.	Compliance	
Schedule 2 Condition B10		The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the EPA's Waste Classification Guidelines Part 1: Classifying Waste, November 2014, or its latest version and dispose of all wastes to a facility that may lawfully accept the waste.	<p>1. Letter from ESP Laboratory to Collaborative Construction Solutions Pty Ltd, titled "Stockpile Soil Assessment" Muswellbrook Marketplace Car Park, 22 Sowerby Street, Muswellbrook NSW 2333), dated 29 October 2019. The letter detailed the results of the testing and subsequent waste classification of the soil in accordance with the NSW EPA Waste Classification Guidelines.</p> <p>2. Waste Tracker Weekly Reports (report from computerised waste receival records system) from September 2018 to October 2019.</p> <p>3. Waste Management Plan Benedict Recycling Mayfield West Dated May 2018 (appendix to the OEMP).</p>	<p>1. Interview (A. Campbell, Environmental Compliance Officer) - the facility does not accept liquid wastes.</p>	<p>1. No evidence of liquid waste storage was observed during the audit.</p>	Benedict require the waste generators to provide waste classification reports for all soil / fill prior to delivery to the facility. The waste classification of each load is recorded on the Waste Register and contains the waste classification of the relevant materials delivered to the site. The system records waste classification results at least for the timeframe required by this Condition.	Compliance	



Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B11		All waste must be: (a) stored wholly within the designated waste stockpile areas. (b) loaded and unloaded within the designated loading and unloading areas.	1. Operational Environmental Management Plan, Revision 5, dated July 2018.		1. All wastes stored at the site during the inspections were stored within the areas defined in the OEMP. 2. All wastes received at the site during the site inspection were unloaded within the areas designated within the OEMP.	All wastes stored at the site during the inspections were stored within the areas defined in the OEMP (refer to the photographs in the Appendices).  All wastes received at the site during the site inspection were unloaded within the areas designated within the OEMP.	Compliance	
Schedule 2 Condition B12	Waste Management Waste Monitoring Program	From the commencement of operations, the Applicant must implement a Waste Monitoring Program for the Development. The program must:	1. Appendix D, Operational Environmental Management Plan, Revision 5, dated July 2018.  2. Waste Tracker Weekly Reports (report from computerised waste receipt records system) from September 2018 to October 2019.  3. Waste Management Plan Benedict Recycling Mayfield West Dated May 2018 (appendix to the OEMP).	1. Interview (A. Campbell, Environmental Compliance Officer) -Appendix D of OEMP, written by Janet Krick - EMM Consulting. OEMP can be found on website		Benedict have prepared a Waste Monitoring Program and based on the Auditor's observations and review of records were implementing the waste monitoring program at the time of the Audit.	Compliance	
		(a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operations;	1. Section 5, Appendix D, Operational Environmental Management Plan, Revision 5, dated July 2018.	1. Interview (A. Campbell, Environmental Compliance Officer) -Appendix D of OEMP, written by Janet Krick - EMM Consulting. OEMP can be found on website		Benedict's planning consultants are considered by the Auditor to be appropriately qualified to prepare the OEMP and subplans and programs.	Compliance	
		(b) include suitable provision to monitor the: (i) quantity, type and source of waste received on site; (ii) type of waste and the material crushed and shredded on site;	1. Section 5, Appendix D, Operational Environmental Management Plan, Revision 5, dated July 2018.			The requirement to monitor and record the source, quantity and types of waste received at the facility is presented in Section 5.1.  The requirement to monitor and record the type of waste and the material crushed and shredded at the facility is presented in Section 5.4.	Compliance	
		(iii) quantity, type and quality of the outputs produced on site; and	1. Section 5, Appendix D, Operational Environmental Management Plan, Revision 5, dated July 2018.			The requirement to monitor and record the type of outputs produced (for dispatch) at the facility is presented in Section 5.2.	Compliance	
		(iv) number of days crushing has occurred per calendar year.	1. Section 5, Appendix D, Operational Environmental Management Plan, Revision 5, dated July 2018.			The requirement to monitor and record the type of outputs produced (for dispatch) at the facility is presented in Section 5.2. This section requires the recording of daily crushing operations.	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(c) ensure that: (i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and		1. Section 5, Appendix D, Operational Environmental Management Plan, Revision 5, dated July 2018.		1. The Auditor observed the weighbridge operator using the waste tracking processes required by the waste monitoring program.	The requirement and process for ensuring that wastes controlled under a waste tracking system has appropriate documentation prior to acceptance on site has not been documented in the Waste Monitoring Plan.	Non Compliance	1. Revise Section 5 of Appendix D of the OEMP to include process for ensuring that wastes controlled under a waste tracking system has appropriate documentation prior to acceptance on site.
		(ii) staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste including asbestos.		1. Section 5, Appendix D, Operational Environmental Management Plan, Revision 5, dated July 2018.			The requirement for and scope of waste load checking, and recording training is not covered by the Waste Monitoring Plan.	Non Compliance	1. Revise Section 5 of Appendix D of the OEMP to include details of waste receipt and management training, including scope and frequency of training in the Waste Monitoring Program.
Schedule 2 Condition B13	Waste Management Waste Management Plan	Prior to the commencement of operations, the Applicant must prepare a Waste Management Plan (WMP) for the Development to the satisfaction of the Secretary. The WMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7.		1. Appendix D, Operational Environmental Management Plan, Revision 5, dated July 2018. 2. Letter from DPIE (Mr B. Zhang) to Benedict (Mr E Dupere) titled "Mayfield West Recycling Facility Environmental Management Plan", dated 25 September 2018. The letter confirmed approval of the OEMP and subplans.			A Waste Management Plan has been prepared (as part of the OEMP, Appendix D).  The OEMP and subsequently the Waste Management Plan were approved by DPIE on 25 September 2018.	Compliance	
		The WMP must: (a) detail the type and quantity of waste to be received during operation of the Development;		1. Appendix D, Operational Environmental Management Plan, Revision 5, dated July 2018.			The requirement for the description of waste types and quantities received permitted to be received at the premises is provided in Section 2.	Compliance	
		(b) include details of stockpile limits in the incoming waste receipt area and waste storage areas;		1. Appendix D, Operational Environmental Management Plan, Revision 5, dated July 2018.			The requirement for the description of the stockpile limits to be maintained at the premises is provided in Section 2.3	Compliance	
		(c) include procedures for ensuring no build-up of waste will occur in the incoming waste receipt area during unexpected machinery breakdown and 24-hour waste receipt for major infrastructure projects; and		1. Appendix D, Operational Environmental Management Plan, Revision 5, dated July 2018.			The requirement for the description of for ensuring no build-up of waste will occur in the incoming waste receipt area during unexpected machinery breakdown is provided in Section 3.1	Compliance	
		(d) details the requirements for non-conforming waste handling and removal.		1. Appendix D, Operational Environmental Management Plan, Revision 5, dated July 2018.			The requirement for the description non-conforming waste handling and removal is provided in Section 4.	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B14		The Applicant must: (a) not commence the operations until the Waste Management Plan required by Condition B13 is approved by the Secretary; and (b) implement the most recent version of the Waste Management Plan approved by the Secretary		1. Letter from DPIE (Mr B. Zhang) to Benedict (Mr E Dupere) titled "Mayfield West Recycling Facility Environmental Management Plan", dated 25 September 2018. The letter confirmed approval of the OEMP and subplans. 2. Email from H. Watters (Senior Compliance Officer DPIE) to J. Krick (EMM Consultants) dated 26 July 2019 acknowledging that the actual start date of the expanded operations was 27 September 2018.			The OEMP and subsequently the Waste Management Plan were approved by DPIE on 25 September 2018.  The start date for the expanded operations was 25 September 2018,	Compliance	
Schedule 2 Condition B15	Waste Management Pests, Vermin and Noxious Weed Management	The Applicant must: (a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and (b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area. Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.		1. Section 4.10 - Operational Environmental Management Plan, Revision 5, dated July 2018.		1. During the audit, there was no evidence of pest infestation at the facility.  2. The audit noted that there were some weeds present, generally between the stormwater channel that runs around the site, and the site fences.	The OEMP (Section 4.10) describes pest and weed monitoring and control actions. During the site inspection, no pest issues were obvious, however some weeds were observed around the site boundaries.  The OEMP specifies that weekly management inspections of the site will include monitoring for pests. No records of implementation of weed or pest inspections (as part of a routine site inspection) were available to the Auditor.  No records of vermin eradication programs were available to the Auditor. Finding: NOT VERIFIED	Non Compliance	1. Develop a weekly environmental compliance checklist for completion by site management that includes pest and weed inspections (Note that details of potential weed species and photographs would assist management in determining if weed eradication is required). 2. Ensure that the weekly environmental inspection records are kept.
Schedule 2 Condition B16	Soils, Water Quality and Hydrology	Prior to the commencement of construction, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the Managing Urban Stormwater: Soils and Construction Guideline and the Erosion and Sediment Control Plan included in the CEMP required by Condition C1.		1. Audit Documentation Notes provided by A. Campbell, Environmental Compliance Officer.	1. No construction works, other than the erection of a roof awning over the fuel storage area, were undertaken as part of this development. No construction waste materials were produced.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	Not Triggered	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B17	Pollution of Waters	The Development must comply with Section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.		1. Water Monitoring Report (Excel Spreadsheet for 2019) Source <a href="http://www.benedict.com.au/about/policies-compliance/">www.benedict.com.au/about/policies-compliance/</a>		1. No visual evidence of the emission of contaminated water from the site was observed during the site inspection. The primary sediment pond was empty and the isolation valve was closed.	A review of the water monitoring reports contained on the Benedict Website found a summary (spreadsheet) for 2019, 2018 and 2017. The reports indicated that no discharges occurred during those calendar years.  No records of water pollution incidents were identified during the audit. It is noted that an incident register was not available to the auditor for review.	Compliance	1. Establish an Incident Register covering environmental incidents. Note that this register can be incorporated into a broader "Incident Register" if one exists.
Schedule 2 Condition B18		Any discharge or water quality criteria specified under the EPL must be complied with.		1. Water Monitoring Report (Excel Spreadsheet for 2019) Source <a href="http://www.benedict.com.au/about/policies-compliance/">www.benedict.com.au/about/policies-compliance/</a>		1. No visual evidence of the emission of contaminated water from the site was observed during the site inspection. The primary sediment pond was empty and the isolation valve was closed.	A review of the water monitoring reports contained on the Benedict Website found a summary (spreadsheet) for 2019, 2018 and 2017. The reports indicated that no discharges occurred during those calendar years.	Compliance	
Schedule 2 Condition B19		Surface water must only be discharged from the location specified in the EPL.		1. EPL 20771		1. During the site inspection, the Auditor inspected the main sedimentation pond and licenced discharge point. No other water discharge points were identified during the audit.	The surface water discharge point identified at the site is the discharge point specified in the Environment Protection Licence.	Compliance	
Schedule 2 Condition B20		Overland flow from the Development must be contained within the sealed areas of the site.		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. Based on the observations made by the Auditor overflows would be contained within the sealed areas and flow into the sealed perimeter drain.	The Surface Water Characterisation and Mitigation Plan provides details of the surface water management system and specifies compliance with all elements of the Approval. The Auditor's observations during the site inspection confirmed that the overland flows are contained within the sealed areas of the site and flow into the perimeter drains.	Compliance	
Schedule 2 Condition B21		Any spills must be contained and disposed of at a licenced facility.		1. Spillage SWMS (Safe Work Method Statement)			The Spillage Safe Work Method Statement requires all spills to be contained, collected and disposed of.  No records of chemical or fuel spills were identified during the audit.	Not Triggered	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B22		Any servicing or repair work on motor vehicles or mobile plant is to be carried out within a sealed area that has environmental controls appropriate for servicing or repair work. This must include bunding where there this work could result in liquids being spilled.		1. Audit Documentation Notes provided by A. Campbell, Environmental Compliance Officer.	1. Interview (H. Nowlan Site Manager) - all plant maintenance is undertaken within the maintenance shed.	1. Site Inspection 31 October 2019 - the maintenance shed was inspected. No plant maintenance activities were underway at the time of the audit. The shed is covered and the shed floor sealed.	The maintenance shed floor is sealed concrete and while not bunded provides an appropriate location for mobile plant maintenance.	Compliance	
Schedule 2 Condition B23	Truck and Wheel Wash	The floor of the truck wash is to be suitably graded and or bunded across the external door openings to prevent the escape of stored materials, process water or spilt liquids.		1. Audit Documentation Notes provided by A. Campbell, Environmental Compliance Officer.	1. Interview (H. Nowlan Site Manager) - the truck wash has not been constructed.	1. No truck wash station was present at the facility.	The proposed truck wash station has not been constructed.	Not Triggered	
Schedule 2 Condition B24		All excess water from the truck wash and wheel wash is to be discharged into suitable holding tanks and removed from the facility for treatment at an appropriately licensed facility or via trade waste.			1. Response to draft report (A.Campbell) The wheel wash systems does not need to be pumped out, just topped up on occasion. The water generally evaporates out over time hence the need to top up.	1. Wheelwash at exit to the site was sighted. There are no wastewater storage tanks or sump pump installed at the truck wash to facilitate pump out and temporary storage of excess contaminated water from the Truck wash (Photo #9).	The existing wheel wash is not provided with a mechanism for pumping or storing excess wastewater. It is noted that the wheel wash water will accumulate sediment and the removal of that sediment will be required to ensure that the wheel wash is effective.	Non Compliance	1. design and install a system to allow the collection and temporary storage of temporary wastewater from the wheel wash. 2. Ensure that wheel wash wastewaters are disposed of, off-site at an appropriately licenced facility.
Schedule 2 Condition B25	Surface Water Management Procedure	Prior to the commencement of operations, the Applicant must design, install and operate a surface water management system for the Development. The system must:		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. Audit inspection of the surface water management system.	The Surface Water Characterisation and Mitigation Plan provides details of the surface water management system that is in place at the facility. The Auditor's observations during the audit confirmed that the system meets the design contained in the Plan.	Compliance	
		(a) be designed and constructed by a suitably qualified and experienced person(s) endorsed by the Secretary; NSW Government 6 Mayfield West Resource Recovery Facility Department of Planning and Environment (SSD 7698)		1. Letter from DPIE (C Ritchie, Director Industrial Assessments) to Benedict titled " <i>Mayfield West Recycling Facility Endorsement of Experts (SSD 7698)</i> ", dated 4 April 2018. The letter approves the appointment of Mr Mark Tooker for the design of the surface water management system and Mr Chris Kuczera for the preparation of the Surface Water Characterisation and Mitigation Plan.			The surface water design expert was approved by DPIE on 4 April 2018.	Compliance	
		(b) be generally in accordance with the conceptual design in the RTS, the letter titled Mayfield West Recycling Facility (SSD 7698) – Water Assessment, dated 8 September 2017 prepared by EMM and applicable Australian Standards;		1. Letter from Tooker Associates to Benedict titled "Area 1 Initial Tank and Holding Tanks Inspection" dated 22 June 2018. The letter certifies that the surface water management system installed Areas 1 meets the requirements of Condition B25 and B26.		1. Audit inspection of the surface water management system.	The surface water management system has been designed and installed (as certified by the DPIE expert) in accordance with Clause B25 of the Approval.	Compliance	



Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(c) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997);	1. Letter from Tooker Associates to Benedict titled "Area 1 Initial Tank and Holding Tanks Inspection" dated 22 June 2018. The letter certifies that the surface water management system installed Areas 1 meets the requirements of Condition B25 and B26.		1. Audit inspection of the surface water management system.	The surface water management system has been designed and installed (as certified by the DPIE expert) in accordance with Clause B25 of the Approval.	Compliance	
		(d) include detention basins with a minimum capacity to contain the 90th percentile rainfall over any consecutive 5 day period in accordance with Managing Urban Stormwater - Soils and Construction Vol. 2B: Waste landfills (Department of Environment and Climate Change NSW, 2008). The wet weather capture capacity requirements of the sediment basins and water treatment system may be modified by the EPL subject to the required surface water characterisation (Condition B33);	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018. 2. Letter from Tooker Associates to Benedict titled "Area 1 Initial Tank and Holding Tanks Inspection" dated 22 June 2018. The letter certifies that the surface water management system installed Areas 1 meets the requirements of Condition B25 and B26.		1. Audit inspection of the surface water management system.	The surface water management system has been designed and installed (as certified by the DPIE expert) in accordance with Clause B25 of the Approval.	Compliance	
		(e) ensure vegetation within the sediment basin and perimeter drain has been removed and the surface water infrastructure has been sealed to prevent surface water infiltration to groundwater; and	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. Vegetation that has grown through the perimeter drain has damaged the concrete seal and the drain is no longer impervious. Refer to Photo #10.	1. Maintenance of the perimeter drain has not been undertaken (removal of vegetation and re-sealing of the drain).	Non Compliance	1. Undertake a detailed survey of the perimeter drain, identify all areas where vegetation has damaged the drain or the drain has been otherwise compromised. Remove all of the vegetation and reseal the drain.
		(f) bund any potentially contaminating waste, any surface water leaving this area must be directed to the three-stage pit or equivalent for treatment, the water must then be directed to holding tanks for testing and depending on its quality either discharged to the perimeter drain or sewer as trade waste see Appendix A.	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018. 2. Drawing 0011WAC01 -"Work as Constructed Potentially Contaminated Material Storage - Centurion Survey Pty Ltd.	1. Interview (H. Nowlan Site Manager) Internal bund drains to a sump. The wastewater is dosed and pumped to storage tanks and used for dust suppression.	1. Holding Tanks, wastewater treatment system and internal bund area. Refer to Photo #11.	1. The surface waters from the internal bund are directed to an appropriate sump and treatment system.	Compliance	
		The Applicant must provide a Compliance Certificate to the Secretary prior to the commencement of operations, that confirms the surface water management system has been designed and installed as per the requirements of Condition B25 and the alterations will not impede or divert natural surface water runoff so as to cause a nuisance to adjoining properties.	1. Letter from Tooker Associates to Benedict titled "Area 1 Initial Tank and Holding Tanks Inspection" dated 22 June 2018. The letter certifies that the surface water management system installed Areas 1 meets the requirements of Condition B25 and B26.			Tooker and Associates issued a compliance certificate to Benedict for the surface water management system on 22 June 2018. Site operations commenced in September 2018.	Compliance	
Schedule 2 Condition B26								

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B27		Prior to the commencement of operations, works-as-executed drawings signed by a registered surveyor must be submitted to the certifying authority demonstrating that the stormwater drainage and finished ground levels have been constructed as approved.		2. Drawing 0011WAC01 (five sheets) - Centurion Survey Pty Ltd, dated 26 July 2018: a) Work as Constructed Site Layout Plan b) Work as Constructed Concrete Lined Final Sediment Basin c) Work as Constructed Potentially Contaminated Material Storage d) Work as Constructed Concrete Swale and 2 Stage Settling Pit e) Work as Constructed Fuel Storage Area.			Centurion Survey Pty Ltd surveyed site and surface water management system and prepared five plans covering the site water management system. The survey plans are dated 26 July 2018. The site operations started in September 2018.	Compliance	
Schedule 2 Condition B28		The surface water management system must be operated and maintained for the duration of the Development.		1. No records of monthly inspections of the surface water management system were available to the Auditor.		1. The site inspection (Photo #9) revealed that woody vegetation has breached the concrete lining of the perimeter drain and in places the drain is no longer sealed sufficiently to prevent ingress of surface water into soils and potentially groundwater.	The surface water management system has not been maintained in accordance with the requirements of the Approval. Specifically, the removal of vegetation and maintenance of the perimeter drain.	Non Compliance	1. Undertake a detailed survey of the perimeter drain, identify all areas where vegetation has damaged the drain or the drain has been otherwise compromised. Remove all of the vegetation and reseal the drain. 2. Initiate a monthly environmental site inspection that covers all compliance issues under the Approval, including the surface water management system. Note that this should include the water treatment system (sumps and pumps).
Schedule 2 Condition B29		The Applicant must maintain the surface water management system to minimise the infiltration of surface water to groundwater. This includes inspecting the infrastructure monthly for cracking and vegetation break through, removing the vegetation and sealing the infrastructure. Any maintenance on the surface water management system must be undertaken by a suitably qualified and experienced person(s), a record of these works must be kept for the life of the Development.		1. No records of monthly inspections of the surface water management system were available to the Auditor.		1. The site inspection (Photo #9) revealed that woody vegetation has breached the concrete lining of the perimeter drain and in places the drain is no longer sealed sufficiently to prevent ingress of surface water into soils and potentially groundwater.	The surface water management system has not been maintained in accordance with the requirements of the Approval. Specifically, the removal of vegetation and maintenance of the perimeter drain.	Non Compliance	1. Undertake a detailed survey of the perimeter drain, identify all areas where vegetation has damaged the drain or the drain has been otherwise compromised. Remove all of the vegetation and reseal the drain. 2. Initiate a monthly environmental site inspection that covers all compliance issues under the Approval, including the surface water management system.

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B30		The Applicant must maintain the surface water detention basins on site with a minimum capacity to contain the 90th percentile rainfall over any consecutive 5-day period in accordance with Managing Urban Stormwater - Soils and Construction Vol. 2B: Waste landfills. The Managing Urban Stormwater series of document relate to clean sediment and therefore the wet weather capture and storage capacity requirements of the sediment basins and treatment systems may be modified by the EPL based on the required surface water characterisation (Condition B33).				1. At the time of the audit, the sediment basin (and basins within the perimeter drain were empty.	At the time of the audit, the sediment basin (and basins within the perimeter drain were empty.	Compliance	
Schedule 2 Condition B31		The Applicant must ensure that a visible marker is installed in the sediment detention 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 90th percentile rainfall event over any consecutive 5-day period.		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. The auditor observed the level marker within the main sediment Basin	The required depth marker was in place at the time of the audit.	Compliance	
Schedule 2 Condition B32		All waste unloaded at the public hand unloading area must be unloaded and stockpiled underneath the public unloading awning or within the main processing building.				1. The auditor observed the unloading of public vehicles within the main processing building.	At the time of the audit public (small) vehicles were only unloaded in the main processing building.	Compliance	
Schedule 2 Condition B33	Surface Water Characterisation and Mitigation Plan	Prior to the commencement of operations, the Applicant must prepare a Surface Water Characterisation and Mitigation Plan (SWCMP) to the satisfaction of the Secretary to characterise the surface water and implement a mitigation plan, the SWCMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The SWCMP must:		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018. 2. Letter from DPIE (Mr B. Zhang) to Benedict (Mr E Dupere) titled "Mayfield West Recycling Facility Environmental Management Plan", dated 25 September 2018. The letter confirmed approval of the OEMP and subplans. This included the SWCMP.			The Surface Water Characterisation and Mitigation Plan (that forms part of the OEMP) has been prepared and was finalised on 6 September 2018. The expanded site operations commenced on 27 September 2018.  The plan was approved by DPE on 25 September 2019.	Compliance	
		(a) be carried out by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Secretary;		1. Letter from DPIE (C Ritchie, Director Industrial Assessments) to Benedict titled "Mayfield West Recycling Facility Endorsement of Experts (SSD 7698)", dated 4 April 2018. The letter approves the appointment of Mr Mark Tooker for the design of the surface water management system and Mr Chris Kuczera for the preparation of the Surface Water Characterisation and Mitigation Plan.			DPE endorsed the appointment of Mr Chris Kuczera for the preparation of the Surface Water Characterisation and Mitigation Plan on 4 April 2018.	Compliance	



Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(b) be prepared in consultation with the EPA;	1. Letter from the NSW EPA (Ms K Masters) providing comments on the Surface Water Characterisation and Mitigation Plan.			The NSW EPA provided comments on the draft Surface Water Characterisation and Mitigation Plan on 13 August 2018.	Compliance	
		(c) detail the triggers of when the pump which transfers surface water from the three-stage pit to the holding tanks would be activated;	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Triggers of when the pump which transfers surface water from the three-stage pit to the holding tanks would be activated is described in Section 3.2 & Appendix C of the SWCMP.	Compliance	
		(d) detail the type and size of the bunding around the potentially contaminating waste area;	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Detail of the type and size of the bunding around the potentially contaminating waste area is described in Section 3.2 of the SWCMP.	Compliance	
		(e) detail the frequency of overflows from the three-stage pit and sediment basin;	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Detail of the frequency of overflows from the three-stage pit and sediment basin is described in Section 3.2 and Appendix C of the SWCMP.	Compliance	
		(f) collect representative samples, including a minimum of four surface water samples from the sediment basin and the three-stage pit. The surface water samples must be analysed for the analytical suite identified in Table 3.16 of the RTS;	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Detail of the surface water sampling and analysis program is described in Section 4 of the SWCMP.	Compliance	
		(g) characterise the surface water for the entire development and detail the potential impact of discharges on receiving surface waters with reference to ANZECC (2000) assessment criteria; NSW Government 7 Mayfield West Resource Recovery Facility Department of Planning and Environment (SSD 7698)	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Detail of the characterisation of the surface water for the entire development and detail of the potential impact of discharges on receiving surface waters is described in Section 4.4 of the SWCMP.	Compliance	
		(h) be based on the results of the surface water characterisation, investigate all practical alternatives to discharge and whether sediment basin sizing, at-source pollution controls, tertiary water treatment, water treatment plants and other treatment and reuse options are appropriate;	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Surface waters are reused for dust suppression. No alternatives are considered practical for the treatment and disposal of surface water from this site.	Not Triggered	
		(i) provide the Secretary with a timeframe for and implement the measures identified in sub-clause (h);	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Surface waters are reused for dust suppression. No alternatives are considered practical for the treatment and disposal of surface water from this site.	Not Triggered	
		(j) consider the human health risks associated with the surface water reuse process at the site;	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Detail of the human health risks associated with the surface water reuse process at the site is described in Section 4.5.4 of the SWCMP.	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(k) include details of the maintenance procedures of the sediment basins and surface water infrastructure;		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Detail of the maintenance procedures of the sediment basins and surface water infrastructure is described in Section 5.2.1 of the SWCMP.	Compliance	
		(l) describe the procedures for maintaining vegetation along the perimeter drain and sediment basin;		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Detail of the procedures for maintaining vegetation along the perimeter drain and sediment basin is described in Section 5.2.1 of the SWCMP.	Compliance	
		(m) establish an ongoing surface water monitoring program to validate the proposed mitigation measures. The surface water monitoring program must provide monitoring details of surface water flows, quality, storage and discharge limits;		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Detail of the ongoing surface water monitoring program is described in Section 6.3 of the SWCMP.	Compliance	
		(n) identify measures for managing pollutant exceedances; and		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Detail of the measures for managing pollutant exceedances is described in Section 6.3 and 8 of the SWCMP.	Compliance	
		(o) identify contingency options to account for any mitigation measures that do not adequately address the site water pollution risks.		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.			Detail of the contingency options to account for any mitigation measures that do not adequately address the site water pollution risks is described in Section 8 of the SWCMP.	Compliance	
Schedule 2 Condition B34		The Applicant must: (a) not commence the operations until the SWCMP required by Condition B33 is approved by the Secretary; and		1. Letter from DPIE (Mr B. Zhang) to Benedict (Mr E Dupere) titled "Mayfield West Recycling Facility Environmental Management Plan", dated 25 September 2018. The letter confirmed approval of the OEMP and subplans. This included the SWCMP.			The Surface Water Characterisation and Mitigation Plan (that forms part of the OEMP) has been prepared and was finalised on 6 September 2018. The expanded site operations commenced on 27 September 2018.	Compliance	
		(b) implement the most recent version of the SWCMP approved by the Secretary for the duration of the development.		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. The site inspection (Photo #9) revealed that woody vegetation has breached the concrete lining of the perimeter drain and in places the drain is no longer sealed sufficiently to prevent ingress of surface water into soils and potentially groundwater.	The SWCMP was not being fully implemented at the time of the Audit. For example, the lack of maintenance of the perimeter drain.	Non Compliance	1. Prepare and implement a monthly environmental compliance inspection checklist that provides a framework for on-going review of environmental compliance requirements.

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B35	Water Quality Validation	Within six months of the commencement of operations and following the management measures being implemented as per SWCMP (Condition B33), the Applicant must provide a Surface Water Validation Report (SWVR) to the satisfaction of the Secretary.		<p>1. Letter from DPIE (C Ritchie, Director Industrial Assessments) to Benedict titled "<i>Mayfield West Recycling Facility Endorsement of Experts (SSD 7698)</i>", dated 4 April 2018. The letter noted that the SWVR had not been provided to DPIE within six months of the commencement of operations.</p> <p>2. Email from DPIE (Ms H. Wattes) titled "<i>RE: SSD 7698 Mayfield West Recycling Facility Condition B35 and clarification regarding commencement of operations</i>", dated 26 July 2019.</p>			<p>Benedict failed to provide the SWVR to the DPIE within the six months timeframe specified in the approval. The endorsement letter requested that the report be provided to the Department by 31 August 2019.</p> <p>DPIE subsequently approved an extension of time for the submission of the SWVR to within one month of the fourth sampling event.</p>	<b>Non Compliance</b>	1.Ensure that all studies and reports required by DPIE are submitted within the requested timeframes.
		The SWVR must: (a) be carried out by a suitably qualified and experienced expert whose appointment has been endorsed by the Secretary;		1. Letter from DPIE (Ms L Cook) to Benedict (Ms A Campbell), titled " <i>Mayfield West Recycling Facility SSD 7698 Condition B35 - Surface Water Validation Report:</i> " dated 11 July 2019. The letter endorses the appointment of Mr C Kuczera for the preparation of the SWVR.			DPIE endorsed the appointment of Mr Chris Kuczera for the preparation of the SWVR on 11 July 2019.	<b>Compliance</b>	
		(b) be prepared in consultation with the EPA;		1. Email from DPIE (Ms H. Wattes) titled " <i>RE: SSD 7698 Mayfield West Recycling Facility Condition B35 and clarification regarding commencement of operations</i> ", dated 26 July 2019.			The revised submission date for the SWVR is yet to be determined as there has been insufficient rain to permit sampling.	<b>Not Triggered</b>	
		(c) collect a minimum of four surface water samples from the sediment basin and four from the three-stage pit system;		1. Email from DPIE (Ms H. Wattes) titled " <i>RE: SSD 7698 Mayfield West Recycling Facility Condition B35 and clarification regarding commencement of operations</i> ", dated 26 July 2019.			The revised submission date for the SWVR is yet to be determined as there has been insufficient rain to permit sampling.	<b>Not Triggered</b>	
		(d) characterise the surface water data (samples) and detail the potential impact of discharges on receiving surface waters with reference to ANZECC (2000) assessment criteria;		1. Email from DPIE (Ms H. Wattes) titled " <i>RE: SSD 7698 Mayfield West Recycling Facility Condition B35 and clarification regarding commencement of operations</i> ", dated 26 July 2019.			The revised submission date for the SWVR is yet to be determined as there has been insufficient rain to permit sampling.	<b>Not Triggered</b>	
		(e) compare the results with the surface water characterisation in the SWCMP (Condition B33);		1. Email from DPIE (Ms H. Wattes) titled " <i>RE: SSD 7698 Mayfield West Recycling Facility Condition B35 and clarification regarding commencement of operations</i> ", dated 26 July 2019.			The revised submission date for the SWVR is yet to be determined as there has been insufficient rain to permit sampling.	<b>Not Triggered</b>	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(f) ensure surface water is being managed in accordance the EPL;		1. Email from DPIE (Ms H. Wattes) titled "RE: SSD 7698 Mayfield West Recycling Facility Condition B35 and clarification regarding commencement of operations", dated 26 July 2019.			The revised submission date for the SWVR is yet to be determined as there has been insufficient rain to permit sampling.	<b>Not Triggered</b>	
		(g) provide an assessment of the effectiveness of implemented mitigation measures;		1. Email from DPIE (Ms H. Wattes) titled "RE: SSD 7698 Mayfield West Recycling Facility Condition B35 and clarification regarding commencement of operations", dated 26 July 2019.			The revised submission date for the SWVR is yet to be determined as there has been insufficient rain to permit sampling.	<b>Not Triggered</b>	
		(h) if necessary, provide additional mitigation measures to control and/or treat all pollutants to ensure the ANZECC (2000) assessment criteria can be met including further storage or the installation of a water treatment plant; and		1. Email from DPIE (Ms H. Wattes) titled "RE: SSD 7698 Mayfield West Recycling Facility Condition B35 and clarification regarding commencement of operations", dated 26 July 2019.			The revised submission date for the SWVR is yet to be determined as there has been insufficient rain to permit sampling.	<b>Not Triggered</b>	
		(i) update the SWCMP to reflect any changes to the surface water management system.		1. Email from DPIE (Ms H. Wattes) titled "RE: SSD 7698 Mayfield West Recycling Facility Condition B35 and clarification regarding commencement of operations", dated 26 July 2019.			The revised submission date for the SWVR is yet to be determined as there has been insufficient rain to permit sampling.	<b>Not Triggered</b>	
		Any alterations to the surface water management system identified in the SWVR must be implemented prior to any further controlled discharges occurring to the satisfaction of the Secretary.		1. Email from DPIE (Ms H. Wattes) titled "RE: SSD 7698 Mayfield West Recycling Facility Condition B35 and clarification regarding commencement of operations", dated 26 July 2019.			The revised submission date for the SWVR is yet to be determined as there has been insufficient rain to permit sampling.	<b>Not Triggered</b>	
Schedule 2 Condition B36									
Schedule 2 Condition B37		The Applicant must comply with any amended surface water quality criteria and discharge limits identified in the EPL			1. Interview (A. Campbell, Environmental Compliance Officer) - insufficient rainfall has been received at the site to trigger the requirement of surface water discharges.		No water discharges have occurred, due to extremely low rainfall since granting of the Approval.	<b>Not Triggered</b>	
Schedule 2 Condition B38	Surface Water Audit	Within 18 months of the commencement of operations, the Applicant must commission an independent Surface Water Audit of the Development to the satisfaction of the Secretary.			1. Interview (A. Campbell, Environmental Compliance Officer) - The Surface Water Audit is scheduled to be commissioned by 25 March 2020.		The Surface Water Audit is scheduled to be commissioned by 25 March 2020.	<b>Not Triggered</b>	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		The audit must: (a) be carried out by a suitably qualified and experienced expert whose appointment has been endorsed by the Secretary;			1. Interview (A. Campbell, Environmental Compliance Officer) - The Surface Water Audit is scheduled to be commissioned by 25 March 2020.		The Surface Water Audit is scheduled to be commissioned by 25 March 2020.	Not Triggered	
		(b) be conducted in consultation with the EPA;			1. Interview (A. Campbell, Environmental Compliance Officer) - The Surface Water Audit is scheduled to be commissioned by 25 March 2020.		The Surface Water Audit is scheduled to be commissioned by 25 March 2020.	Not Triggered	
		(c) audit the Development whilst it is in operation;			1. Interview (A. Campbell, Environmental Compliance Officer) - The Surface Water Audit is scheduled to be commissioned by 25 March 2020.		The Surface Water Audit is scheduled to be commissioned by 25 March 2020.	Not Triggered	
		(d) validate the development against the SWCMP required by Condition B33;			1. Interview (A. Campbell, Environmental Compliance Officer) - The Surface Water Audit is scheduled to be commissioned by 25 March 2020.		The Surface Water Audit is scheduled to be commissioned by 25 March 2020.	Not Triggered	
		(e) include a summary of any EPL water quality exceedances;			1. Interview (A. Campbell, Environmental Compliance Officer) - The Surface Water Audit is scheduled to be commissioned by 25 March 2020.		The Surface Water Audit is scheduled to be commissioned by 25 March 2020.	Not Triggered	
		(f) review the design and management practices of the Development against industry best practice for surface water; (g) 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 (h) provide a further program of monitoring to address water quality issues that may emerge over time.			1. Interview (A. Campbell, Environmental Compliance Officer) - The Surface Water Audit is scheduled to be commissioned by 25 March 2020.		The Surface Water Audit is scheduled to be commissioned by 25 March 2020.	Not Triggered	
Schedule 2 Condition B39		Within three months of commissioning this audit, the Applicant must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report. The Applicant must comply with any reasonable requirement(s) of the Secretary arising from the Surface Water Audit.			1. Interview (A. Campbell, Environmental Compliance Officer) - The Surface Water Audit is scheduled to be commissioned by 25 March 2020.		The Surface Water Audit is scheduled to be commissioned by 25 March 2020.	Not Triggered	
Schedule 2 Condition B40	Groundwater	Within 12 months of the commencement of operations the Applicant must conduct a Groundwater Monitoring Program to the satisfaction of the Secretary.		1. Email from EMM Consultants (T Wilkinson) to DPIE (Ms H Watters) titled "Benedict waste recycling facility - Mayfield west SSD 7698 (sic)", dated 27 September 2019. The email (and subsequent responses from DPIE) detail clarifications regarding the scope of the Groundwater Audit to be undertaken by EMM.	1. Interview (A. Campbell, Environmental Compliance Officer) - EMM consulting completing this report now. 12 months since commencement of operations is 25 Sept 2019 2. The final report due to be submitted to DPIE by 25 Dec 2019.		The Groundwater Monitoring Program was being undertaken at the time of the audit.	Compliance	



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		The program must: (a) be carried out by a suitably qualified and experienced expert in consultation with the EPA;			1. Interview (A. Campbell, Environmental Compliance Officer) - EMM consulting completing this report now. 12 months since commencement of operations is 25 Sept 2019 2. The final report due to be submitted to DPIE by 25 Dec 2019.		The Groundwater Monitoring Program is being conducted by EMM Consultants who are considered (by the Auditor) to be suitably qualified to undertake the program.	<b>Not Triggered</b>	
		(b) ascertain the potential for leakage of the sediment basin and perimeter drain to groundwater;			1. Interview (A. Campbell, Environmental Compliance Officer) - EMM consulting completing this report now. 12 months since commencement of operations is 25 Sept 2019 2. The final report due to be submitted to DPIE by 25 Dec 2019.		The Groundwater Audit was not completed at the time of the Audit.	<b>Not Triggered</b>	
		(c) detail baseline data, groundwater levels and groundwater quality against the relevant criteria;			1. Interview (A. Campbell, Environmental Compliance Officer) - EMM consulting completing this report now. 12 months since commencement of operations is 25 Sept 2019 2. The final report due to be submitted to DPIE by 25 Dec 2019.		The Groundwater Audit was not completed at the time of the Audit.	<b>Not Triggered</b>	
		(d) provide mitigation and contingency measures to prevent the sediment basins from leaking; and			1. Interview (A. Campbell, Environmental Compliance Officer) - EMM consulting completing this report now. 12 months since commencement of operations is 25 Sept 2019 2. The final report due to be submitted to DPIE by 25 Dec 2019.		The Groundwater Audit was not completed at the time of the Audit.	<b>Not Triggered</b>	
		(e) identify a program for ongoing groundwater monitoring and reporting.			1. Interview (A. Campbell, Environmental Compliance Officer) - EMM consulting completing this report now. 12 months since commencement of operations is 25 Sept 2019 2. The final report due to be submitted to DPIE by 25 Dec 2019.		The Groundwater Audit was not completed at the time of the Audit.	<b>Not Triggered</b>	
Schedule 2 Condition B41		Within three months of the completion of the Groundwater Monitoring Program, the Applicant must submit a copy of the Groundwater Monitoring Program as identified in Condition B40 to the Secretary and the EPA.			1. Interview (A. Campbell, Environmental Compliance Officer) - EMM consulting completing this report now. 12 months since commencement of operations is 25 Sept 2019 2. The final report due to be submitted to DPIE by 25 Dec 2019.		The Groundwater Audit was not completed at the time of the Audit.	<b>Not Triggered</b>	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B42	Hazardous Materials Storage	As a minimum, the Applicant must ensure the 40,000 litre self-bunded diesel tank is managed as follows: (a) the tank must be installed in the centre of the site in accordance with Figure 3.1 of the RTS;				1. The fuel tank is located in an appropriate location in the centre of the site.	The fuel tank is located in an appropriate location in the centre of the site.	Compliance	
		(b) the tank must be installed in accordance with the relevant Australian Standards, must be above ground and be protected against impact from heavy vehicles;				1.The tank is a self bunded (commercially available unit) that meets the requirements of AS1940. 2. While that tank is located within a bunded area, the tank is not protected from potential impacts from heavy vehicles. (Photo #12)	The fuel tank has not been provided with impact protection from heavy vehicles.	Non Compliance	1. Install bollards (that meet the requirements of AS3845) to permanently separate heavy vehicles from the fuel tank installation.
		(c) the refuelling area must be covered with an awning to minimise dirty water run-off;				1. The diesel tank installation is located under an appropriately designed and constructed awning.	The diesel tank installation is located under an appropriately designed and constructed awning.	Compliance	
		(d) overfilling of the tank must be prevented through gauging and monitoring of the tank's contents;				1. The tank is designed to meet the required Australian Standards and is fitted with appropriate gauging.	The tank is designed to meet the required Australian Standards and is fitted with appropriate gauging.	Compliance	
		(e) hoses used for transfer of diesel must be inspected weekly;		1. No records of weekly inspection checks were available to the Auditor.			No weekly inspections of the fuel tank installation are documented.	Non Compliance	1. Prepare and implement a weekly environmental compliance inspection checklist covering the fuel storage area.
		(f) in an emergency, flow of liquid from the storage tank to a consuming device must be immediately shut off;				1. The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off (safe fill) controls.	The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	Compliance	
		(g) the shut off valve must comply with the relevant Australian Standard and be fire resistant;				1. The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	Compliance	
		(h) the diesel tank and re-fuelling area must be bunded within an area of impervious hardstand; and				1. The tank is located with in a bunded area on hard stand. 2. During the Audit, mobile plant was being refuelled. The mobile plant was located outside of the bunded area. Refer to Photo #12.	While the tank is located within a bunded area, heavy plant is refuelled outside of the bund.	Non Compliance	1. Install a bund (or catch drain) around the refuelling pad to ensure that any spills occurring during refuelling can be fully contained.
		(i) a diesel spill kit must be stored in the refuelling area and deployed in the event of a spill.				1. A diesel spill kit was located next to the diesel tank. However, the kit was not adequately provisioned. There was insufficient spill control and clean-up materials to be effective in the case of a fuel spill.	The spill kit provided for the diesel fuel storage area was not properly provisioned.	Non Compliance	1. Replenish the spill kit at the Diesel storage area. 2. Prepare and implement a weekly environmental compliance inspection checklist that covers spill kit inspection.

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B43	Chemical Spill and Fire Water Management	To ensure that chemical spills and fire-water are contained on-site, prior to the commencement of operations and to the satisfaction of FRNSW, the Applicant must ensure:		1. Emergency Response Plan (section 8) - Appendix to the OEMP. 2. No correspondence from FRNSW was available to the auditor endorsing the chemical or firewater containment capability at the site.		1. Fuel spill kits are available on site.	The emergency response plan provides guidance in case of fire and requires that the value on the discharge point to the sedimentation basin be kept close to allow fire waters to be contained.  No correspondence from FRNSW was available to the auditor endorsing the chemical or firewater containment capability at the site.	Non Compliance	1. Contact FRNSW and seek approval for containment of fire water.
		(a) a stormwater isolation valve is installed, the stormwater isolation valve must be closed at all times unless stormwater is being discharged and its closure must be monitored weekly;			1. Interview (H. Nowlan Site Manager) - the outlet valve to the Sediment Basin is not routinely checked (to ensure that it is kept closed).	1. At the time of the audit the outlet valve on the Sedimentation Basin was closed.	There is no weekly inspection of the sedimentation pond discharge valve.	Non Compliance	1. Prepare and implement a weekly environmental compliance inspection checklist that includes weekly checks on the sediment pond outlet valve.
		(b) during an incident, the stormwater isolation valve must remain in the closed position until manually opened upon confirmation that stormwater isolation is no longer required or once any contaminated water is disposed via trade waste or at a site that can lawfully receive the waste; and		1. Emergency Response Plan (section 8) - Appendix to the OEMP.			The emergency response plan provides guidance in case of fire and requires that the value on the discharge point to the sedimentation basin be kept close to allow fire waters to be contained.	Compliance	
		(c) the location of the stormwater isolation valve and any associated controls must be clearly identified on the site's fire hydrant block plan, fire sprinkler block plan and the site plan located within the site's Emergency Response Plan prepared as part of the OEMP as required by Condition C7.		1. Emergency Response Plan (section 8) - Appendix to the OEMP.			The location of the stormwater isolation valve is clearly identified on the site's fire hydrant block plan.	Compliance	
Schedule 2 Condition B44	Traffic and Access	The Applicant must implement all reasonable and feasible measures to minimise the impact on the site's access road and any impacts on 1 McIntosh Drive, Mayfield West (Lot 16 in DP 270249).		1. Benedict Driver Induction Form		1. Trucks were observed by the Auditor queuing on the site access road on the morning of the Audit.	A review of the Driver Induction form found no reference to traffic management relating to the site access road or 1 Macintosh Drive.	Non Compliance	1. Update the Driver induction materials to fully cover the requirements for minimising impacts on the site access road or 1 Macintosh Drive.
Schedule 2 Condition B45		Prior to the commencement of operations, the vehicular entrance and exit driveways and the direction of traffic movement within the site are to be permanently marked on the pavement surface.				1. Road markings and directional signage was in place at the entrance to the site.	Road markings and directional signage was in place at the time of the Audit.	Compliance	
Schedule 2 Condition B46		All customers are not permitted to leave their vehicles anywhere on the site other than the public unloading area and to access the pedestrian walkways between marked car parking spaces and the weighbridge and office area.		1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			Traffic and pedestrian management is detailed in Appendix G of the OEMP. All members of the Public (including contractors) are provided with the Driver Induction on arriving at the weighbridge.  Neither the induction form or Driver Code of Conduct specifies that members of	Non Compliance	1. Include the key traffic safety requirements that relate to members of the public using the site in an appropriate information pamphlet / induction form for members of the public using the facility. The existing Driver Induction and Visitor Induction are not the appropriate documents as they are not applicable to members of the



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
							the public using the facility are not permitted to leave their vehicles anywhere on the site other than the public unloading area.		general public. 2. Update the site entrance signage to inform members of the public that they are not permitted to exit their vehicles, except to unload in the public, hand unloading area.
Schedule 2 Condition B47	Traffic and Access Parking	Prior to the commencement of operations, the Applicant must provide and mark 25 on-site parking spaces (including two accessible spaces) for staff and visitors to ensure that traffic associated with the Development does not utilise public and residential streets or public parking facilities. Parking areas are to be constructed in accordance with the latest version of Australian Standard 2890. All parking associated with the Development must be contained on site.				1. twenty five marked parking areas were observed during audit. There are two parking areas one adjacent to plant storage shed and adjacent to the site office.	The specified twenty five parking spaces have been provided.	Compliance	
Schedule 2 Condition B48		Parking is only permitted within the designated parking spaces		1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. light vehicles were parked outside of the allocated parking spaces. However, no vehicles were parked on the site access roads.	Light vehicles were observed to be parked outside of the allocated parking areas on-site, however in accordance with Condition B47, not vehicles associated with the Facility were parked on the public roads leading to the facility.	Compliance	
Schedule 2 Condition B49	Operating Conditions	The Applicant must ensure: (a) all vehicular movement to and from the site must be in a forward direction;		1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. All waste delivery vehicles observed during the Audit entered and left the site in a forward direction.	The site access has been set up to permit all vehicles to enter and leave the site in a forward direction.	Compliance	
		(b) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are maintained in accordance with the latest version of Australian Standard 2890.1 and Australian Standard 2890.2;		1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			The OTPMP details the design of the internal roads and parking in accordance with this Condition.	Compliance	
		(c) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines;		1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			The OTPMP details the design of the internal roads and parking in accordance with this Condition.	Compliance	
		(d) the Development does not result in any vehicles queuing on the public road network or along the sites access road owned known as 1 McIntosh Drive, Mayfield West (Lot 16 in DP 270249) which is subject to a right of carriageway;		1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. At the time of the Audit trucks parked up waiting to enter the site.	Trucks were observed to be parked up while queuing on the site access road.	Non Compliance	1. Investigate the reasons for queuing and options to prevent queuing of trucks on the site access road.
		(e) heavy vehicles and bins associated with the Development are not to be parked on local roads or footpaths in the vicinity of the site;		1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. No bins or heavy vehicles were observed to be parked on local roads or footpaths near the facility.	No bins or heavy vehicles were observed to be parked on local roads or footpaths near the facility.	Compliance	

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(f) only light vehicles and trailers are permitted within the public unloading area, no heavy vehicles are permitted within the public unloading area;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. No heavy vehicles were observed in the public hand unloading area. Site signage directed waste deliveries to the appropriate unloading area.	Heavy and light vehicle unloading is separated as required by this condition.	Compliance	
		(g) all vehicles are wholly contained on site before being required to stop;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. The weighbridge (where vehicles are required to stop) is located well within the site and no vehicles would be required to stop near the site entrance.	There is sufficient room on site for all sized waste delivery vehicles to be contained within the site when required to be stopped.	Compliance	
		(h) all loading and unloading of materials is carried out on-site in designated areas;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. All waste unloading observed during the audit occurred in the designated waste unloading areas. 2. Site signage provided appropriate directions to the designated unloading areas.	All waste deliveries observed were unloaded in the designated waste unloading areas. Site signage directed traffic to the relevant waste unloading areas.	Compliance	
		(i) the different activities such as unloading (public and contractor), processing and stockpiling areas at the site are clearly marked and separated by physical barriers to ensure safety is maintained;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. All waste unloading areas are segregated, signposted and where required provided with physical barriers.	All waste unloading areas are segregated, signposted and where required provided with physical barriers.	Compliance	
		(j) signage must be erected to direct the public and contractors to the designated unloading and loading areas;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. Site signage was observed that directs public and contractors to the appropriate waste unloading areas. Refer to Photo #13.	Site signage was observed that directs public and contractors to the appropriate waste unloading areas.	Compliance	
		(k) public and contractor unloading areas are kept separate;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. No heavy vehicles were observed in the public hand unloading area. Site signage directed waste deliveries to the appropriate unloading area.	Heavy and light vehicle unloading is separated as required by this condition.	Compliance	
		(l) pedestrian access paths are clearly marked and interactions between pedestrians and vehicles must be minimised;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. Marked pedestrian paths. Refer to Photo #14.	Pedestrian paths associated with the weighbridge and office are clearly marked.	Compliance	
		(m) an outbound wheel wash must be installed behind the exit weighbridge as per Figure 3.9 of the RTS;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. Wheel wash. Refer to Photo 10	The required wheel wash is installed and operational.	Compliance	
		(n) signage is erected and vehicles at the site do not exceed a speed of 20 km/h;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. The site speed limit has been set at 10km/hr. Refer to Photo #15.	The site speed limit has been set at 10 kmh/hr.	Compliance	
		(o) vehicle manoeuvring areas must always be kept clear of any obstacles, including parked cars; and	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. Parking areas and other obstacles are clear of heavy vehicle turning areas.	Parking areas and other obstacles are clear of heavy vehicle turning areas.	Compliance	

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(p) the turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).		1. Car park turning areas are adequate and allow for the safe manoeuvring of cars.	Car park turning areas are adequate and allow for the safe manoeuvring of cars.	Compliance	
Schedule 2 Condition B50	Operational Traffic and Pedestrian Management Plan	Prior to the commencement of operations, the Applicant must prepare an Operational Traffic and Pedestrian Management Plan (OTPMP) for the Development to the satisfaction of the Secretary. The plan must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The OTPMP must: (a) be prepared by a suitably qualified and experienced person(s);	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			The OTPMP has been prepared and is provided as an Appendix of the OEMP.	Compliance	
		(b) be prepared in consultation with Council;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP). 2. Email (Appendix to the OTPMP) from Council (G. Mansfield) to EMM Consultants (J Krick), titled "RE: Attention Geof Mansfield. Benedict Recycling - Mayfield West Recycling Facility - Operational Traffic and Pedestrian Management Plan", dated 11 May 2018. The email provides Councils feedback on the OTPMP.			Council were consulted during the preparation of the OTPMP.	Compliance	
		(c) detail the measures that would be implemented to ensure road safety and network efficiency during operation;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			Details of the measures that would be implemented to ensure road safety and network efficiency during operation are provided in Section 6 of the OTPMP.	Compliance	
		(d) detail measures to ensure public safety is maintained at all times including marking pedestrian access ways and signage to direct the public to the public unloading area;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			Details of the measures to ensure public safety is maintained at all times including marking pedestrian access ways and signage to direct the public to the public unloading area are provided in Sections 5.3, 5.4 and 10.1 of the OTPMP.	Compliance	
		(e) detail how the public unloading area will be barricaded from the contractor unloading areas and processing areas to ensure safety is maintained;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			Details of how the public unloading area will be barricaded from the contractor unloading areas and processing areas to ensure safety is maintained are provided in Section 5.5 of the OTPMP.	Compliance	
		(f) detail how traffic exiting the main processing building will give way to traffic exiting the segregated heavy waste processing and stockpiling area to ensure vehicles safely exit the site;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			Details of how traffic exiting the main processing building will give way to traffic exiting the segregated heavy waste processing and stockpiling area to ensure vehicles safely exit	Compliance	

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
						the site are provided in Section 5.4 of the OTPMP.		
		(g) detail heavy vehicle routes, access and parking arrangements;	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			Details of heavy vehicle routes, access and parking arrangements are provided in Section 5 and 6 of the OTPMP.	Compliance	
		(h) include a Driver Code of Conduct to: (i) minimise the impact on the local and regional road network; (ii) minimise conflicts with other road users; (iii) minimise road traffic noise; and (iv) ensure truck drivers use Steel River Boulevard and McIntosh Drive (the use of Murray Dwyer Circuit is not permitted); (v) ensure truck drivers use specified routes	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			The Drivers Code of Conduct is provided in Section 8.1 of the OTPMP.	Compliance	
		(i) include a program to monitor the effectiveness of these measures; and	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			Details of the measures that would be implemented to monitor the effectiveness of these measures during operation are provided in Section 11 of the OTPMP.	Compliance	
		(j) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			Details of the measures that would be implemented to notify residents and the community (including local schools) of any potential disruptions to routes are provided in Section 12.2 of the OTPMP.	Compliance	
Schedule 2 Condition B51		The Applicant must: (a) not commence the operations until the OTPMP required by Condition B50 is approved by the Secretary; and	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP). 2. Letter from DPIE (Mr B. Zhang) to Benedict (Mr E Dupere) titled "Mayfield West Recycling Facility Environmental Management Plan", dated 25 September 2018. The letter confirmed approval of the OEMP and subplans. This included the OTPMP.			DPE approved the OEMP and OPTPMP on 25 September 2018.	Compliance	
		(b) implement the most recent version of the OTPMP approved by the Secretary for the duration of the development.	1. Operational Traffic and Pedestrian Management Plan, Mayfield West Recycling Facility, Revision 1.2 (Appendix G of OEMP).			The OTPMP specifies that, in accordance with this approval, truck must not queue on the site access road. Additionally, the Driver Induction does not cover all of the information contained in the Driver's Code of Conduct. However the Code of Conduct is not provided to all heavy vehicle accessing the site.	Non Compliance	1. Refer to Condition B49 (d) 2. Provide all heavy vehicle operators using the site with a copy of the Drivers Code of Conduct as part of the Site Induction process.

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B52	<b>Meteorological Station</b>	Before the commencement of the operations, the Applicant must install a suitable meteorological station on the site that complies with the requirements in the EPA's Approved Methods for Sampling of Air Pollutants in New South Wales.				1. Meteorological Station and demonstration of operations by the Site Manager.	The meteorological station has been installed on site and was operational at the time of the Audit.	Compliance	
Schedule 2 Condition B53		The Applicant must maintain the meteorological station to the satisfaction of the EPA for the life of the development.				1. Meteorological Station and demonstration of operations by the Site Manager.	The meteorological station has been installed on site and was operational at the time of the Audit.	Compliance	
Schedule 2 Condition B54	<b>Air Quality</b>	All reasonable steps must be taken to minimise dust generated during all works authorised by this consent.					Refer to Condition B55 (h).	Non Compliance	1. Review dust management actions including stockpile water sprays and sweeping of internal roads.
Schedule 2 Condition B55	<b>Dust Minimisation</b>	The Applicant must ensure that: (a) all on-site roads and car parking areas are sealed with concrete or asphalt;		1. Interview (A. Campbell, Environmental Compliance Officer) a) All roads have existing bitumen from previous owners. No roads need sealing. b) Hand unload shed all concrete, inner bund (potentially contaminated area) concreted, north western corner (end of hand unload shed), concreted.	1. The internal roads (to the weighbridge and waste unloading shed) are sealed. The designated car parking areas are sealed.		The internal roads (to the weighbridge and waste unloading shed) are sealed. The designated car parking areas are sealed.	Compliance	
		(b) all operating, storage, unloading and loading areas must be sealed with concrete, asphalt or other impervious barrier(s) of the same or greater quality;				1. All storage areas, loading and unloading areas are sealed with concrete.	All waste storage and handling areas are sealed with concrete.	Compliance	
		(c) water sprinklers at the crushing and screening plant must be utilised at all time when the plant is operational;				1. Water sprinklers were observed within the waste receival and sorting shed and at the external stockpiles. A mobile water cart was also observed operating on-site.	No crushing or screening is being undertaken at the facility.	Not Triggered	
		(d) dust suppressants must be used to prevent particulate emissions from stockpiles and other dust generating sources;				1. Water sprinklers were observed within the waste receival and sorting shed and at the external stockpiles. A mobile water cart was also observed operating on-site.	A water spray cannon and fixed water sprays were installed and operational at the time of the Audit.	Compliance	
		(e) trucks and vehicles entering and leaving the Development that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and unloading;		1. Drivers Induction Form (Form 254.6)		All trucks accessing the site at the time of the audit were covered.	All trucks accessing the site at the time of the audit were covered.	Compliance	
		(f) crushing occurs for no more than 46 days per year in total;			1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the audit period.		No crushing works have been undertaken during the Audit Period.	Not Triggered	
		(g) crushing does not occur during adverse meteorological conditions;			1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been		No crushing works have been undertaken during the Audit Period.	Not Triggered	



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
					undertaken at the site during the audit period.				
		(h) all operations and activities occurring at the Development must be carried out in a manner that minimises the emissions of air pollutants from the Development;				1. No significant dust generation was observed during the audit, however the following observations were made: a) there were no water sprays used on the screening works a) while a water truck was effective in keeping the internal roads wet, the internal road ways were heavily tracked with mud and dirt.	Further dust mitigation actions are required to ensure that dust generation can be controlled on the site. For example: a) ensuring that all stockpiles and screening are provided with appropriate water sprays. B) that internal roads are cleaned (swept) to reduce soil / mud loads.	<b>Non Compliance</b>	1. Review dust management actions including stockpile water sprays and sweeping of internal roads.
		(i) trucks associated with the Development do not track dirt onto the public road network;				1. A wheel wash has been installed and was operating at the time of the inspection. 2. No visible dust was observed from trucks entering or leaving the site.	A wheel wash has been installed and was operating at the time of the inspection.	<b>Compliance</b>	
		(j) public roads used by these trucks are kept clean; and				1. A wheel wash has been installed and was operating at the time of the inspection. 2. No visible dust was observed from trucks entering or leaving the site.	At the time of the Audit the site access roads were not generating dust.	<b>Compliance</b>	
		(k) any works are carried out progressively on site to minimise exposed surfaces.					No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	<b>Not Triggered</b>	
Schedule 2 Condition B56	Air Quality Discharges	Equipment must be installed and operated in accordance with best practice to ensure that the development complies with all load limits, air quality criteria, air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.					All air quality criteria specified in the EPL have been met during the Audit Period.	<b>Compliance</b>	
Schedule 2 Condition B57	Air Quality Management Plan	Prior to the commencement of operations, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Secretary. The AQMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The AQMP must:		1. Air Quality Management Plan (Appendix F to the OEMP) 2. Letter from DPIE (Mr B. Zhang) to Benedict (Mr E Dupere) titled "Mayfield West Recycling Facility Environmental Management Plan", dated 25 September 2018. The letter confirmed approval of the OEMP and subplans. This included the AQMP.			The AQMP has been prepared and was approved by DPE on 25 September 2018.	<b>Compliance</b>	
		(a) be prepared by a suitably qualified and experienced person(s);		1. Air Quality Management Plan (Appendix F to the OEMP)			The AQMP has prepared by Ramboll Environmental Consultants. Ramboll are considered to be an suitably qualified and experienced consultant.	<b>Compliance</b>	

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(b) be prepared in consultation with the EPA;	1. Section 1.1 of the Air Quality Management Plan (Appendix F to the OEMP). 2. Letter from the NSW EPA (S. James, Unit Head Compliance) to EMM Consultants (J. Krick, Senior Environmental Planner), dated 27 June 2018, declining the invitation to comment on the AQMP.			Correspondence confirming that the EPA had been consulted during the preparation of the AQMP was sighted by the Auditor. Note that Section 1.1 of the plan that references the details of consultation with the EPA has been left blank in Revision 1 of the Plan.	Compliance	
		(c) detail and rank all emissions from all sources of the Development, including particulate emissions and odour;	1. Air Quality Management Plan (Appendix F to the OEMP)			Details and ranking of particulate and odour emissions are provided in Section 2 of the AQMP.	Compliance	
		(d) describe the measures that will be implemented to minimise the potential risks to adverse air quality in the area including: (i) the management and mitigation measures to be employed at the site; (ii) plant and equipment being maintained to ensure that it is in good order; (iii) how the air quality impacts of the development will be minimised during adverse meteorological conditions or extraordinary events; (iv) identification of high emission generating operational activities, including proposed times when these works will be carried out (including respite periods if required) and mitigation measures to minimise adverse impacts from these activities; (v) compliance with the relevant conditions of this consent;	1. Air Quality Management Plan (Appendix F to the OEMP)			Details of mitigation measures to be implemented are provided in Section 2.2 to 2.6 of the AQMP.  Details of compliance with the Approval is provided in Table 1.1 of the AQMP.	Compliance	
		(e) identify the control measures that will be implemented for each emission source; and	1. Air Quality Management Plan (Appendix F to the OEMP)			Details of control measures to be implemented for each emission source is provided in Table 2.2 of the AQMP.	Compliance	
		(f) define what constitutes an air quality incident and includes a protocol for identifying and notifying the Department and relevant stakeholders of any air quality incidents.	1. Air Quality Management Plan (Appendix F to the OEMP)			Details of what constitutes an air quality incident and includes a protocol for identifying and notifying the Department and relevant stakeholders of any air quality incidents are provided in Section 3.5 of the AQMP.	Compliance	
Schedule 2 Condition B58		The Applicant must: (a) not commence the operations until the AQMP required by Condition B57 is approved by the Secretary; and (b) implement the most recent version of the AQMP approved by the Secretary for the duration of the development.	1. Air Quality Management Plan (Appendix F to the OEMP) 2. Letter from DPIE (Mr B. Zhang) to Benedict (Mr E Dupere) titled "Mayfield West Recycling Facility Environmental Management Plan", dated 25 September 2018. The letter confirmed approval of the OEMP and subplans. This included the AQMP.		1. Water sprays were not in operation at the screen plant at the time of the Audit. 2. Paved surfaces were caked with soil and mud. No evidence of sweeping of the paved surfaces was provided to the Auditor.	The AQMP (that forms part of the OEMP) has been prepared and was Approved by DPE on 25 September 2018. The expanded site operations commenced on 27 September 2018.  The AQMP was not being fully implemented at the time of the Audit.	Non Compliance	1. Ensure that all air quality mitigation measures contained in the AQMP are implemented.
Schedule 2 Condition B59	Air Quality Monitoring and Reporting	The Applicant must carry out Air Quality Monitoring and Reporting of the Development for the first three crushing events following the commencement of the operations to the satisfaction of the		1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the audit period.		No crushing has been undertaken at the facility during the Audit Period.	Not Triggered	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		Secretary. The monitoring and reporting must:							
		(a) be carried out by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Secretary;			1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the audit period.		No crushing has been undertaken at the facility during the Audit Period.	<b>Not Triggered</b>	
		(b) monitor the dust emissions whilst the Development is in operation and crushing (as described section 3.5 of the RTS) is occurring;			1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the audit period.		No crushing has been undertaken at the facility during the Audit Period.	<b>Not Triggered</b>	
		(c) include a summary of air emission related complaints and any actions that were carried out to address the complaints;			1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the audit period.		No crushing has been undertaken at the facility during the Audit Period.	<b>Not Triggered</b>	
		(d) validate the Development against air quality predictions in the RTS;			1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the audit period.		No crushing has been undertaken at the facility during the Audit Period.	<b>Not Triggered</b>	
		(e) review design and management practices of the Development against industry best practice for dust emissions; and			1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the audit period.		No crushing has been undertaken at the facility during the Audit Period.	<b>Not Triggered</b>	
		(f) include an action plan that identifies and prioritises additional dust mitigation measures that may be necessary to reduce emissions.			1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the audit period.		No crushing has been undertaken at the facility during the Audit Period.	<b>Not Triggered</b>	
Schedule 2 Condition B60		Within three months of each monitoring event, the Applicant must submit a copy of the Air Quality Monitoring Report (Condition B59) to the Secretary, together with its response to any recommendations.			1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the audit period.		No crushing has been undertaken at the facility during the Audit Period.	<b>Not Triggered</b>	
Schedule 2 Condition B61	Odour	The Applicant must ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).		1. Complaints Register.		1. At the time of the audit no offensive odours were apparent.	No odour complaints have been received by the facility management. At the time of the audit no offensive odours were detected.	<b>Compliance</b>	
Schedule 2 Condition B62	NOISE	The Applicant must comply with the hours detailed in Table 2.		1. Complaints Register. 2. Driver Induction. 3. Drivers Code of Conduct			No complaints regarding out of hours operation have been received. The Driver Code of Conduct specifies the operating hours of the facility.	<b>Compliance</b>	
Schedule 2 Condition B63		Works outside of the hours identified in Condition B62 may be undertaken in the following circumstances: (a) the works are inaudible at the nearest sensitive receivers; (b) for the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; or (c) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.		1. Complaints Register.	1. Interview (A. Campbell, Environmental Compliance Officer) - There have been out of hours operations during the Audit Period		No evidence of out of hours operation were identified during the Audit.	<b>Not Triggered</b>	



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B64		Waste receipt is permitted on a 24-hour per day basis on limited occasions to facilitate major infrastructure projects. Limited occasions is defined as: (a) no greater than six times per year; and (b) only for a period of less than two weeks in length for each occasion.			1. Interview (A. Campbell, Environmental Compliance Officer) - There have been no 24 hours operations during the Audit Period		There have been no 24 Hr operations during the audit period.	Not Triggered	
Schedule 2 Condition B65		The Secretary, Council and all adjacent landowners must be notified no later than 48 hours prior to each of the 24-hour waste receipt periods referred to in Condition B64 along with a description of the major infrastructure projects which necessitate the 24-hour operations.			1. Interview (A. Campbell, Environmental Compliance Officer) - There have been no 24 hours operations during the Audit Period		There have been no 24 Hr operations during the audit period.	Not Triggered	
Schedule 2 Condition B66		During the 24-hour waste receipt period (as stipulated in Condition B64), the number of heavy vehicles accessing the site from 6 pm to 6 am must not exceed 12.			1. Interview (A. Campbell, Environmental Compliance Officer) - There have been no 24 hours operations during the Audit Period		There have been no 24 Hr operations during the audit period.	Not Triggered	
Schedule 2 Condition B67	Noise Management	The crusher and shredder are only permitted to be operated in the segregated heavy waste processing and stockpiling area, no further south than 130 m from the northern site boundary (see Appendix A).					1. The shredder operations were occurring within 130 m from the northern site boundary.	Compliance	
Schedule 2 Condition B68		The mobile screens in the segregated heavy waste processing and stockpiling area must not be operated simultaneously with the crusher or shredder.			1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the audit period.		No crushing has been undertaken at the facility during the Audit Period.	Not Triggered	
Schedule 2 Condition B69		The Applicant must: (a) implement best practice, including all reasonable and feasible noise management and mitigation measures to minimise operational, low frequency and traffic noise generated by the Development;		1. Complaints Register 2. Noise monitoring reports (up loaded to the Benedict Website) 3. Section 4.8 Operations Environmental Management Plan.		1. During the inspection the auditor noted that noise from the screening machinery was located at the northern end of the site and that noise from that equipment was not discernible that the southern end of the site. 2. The unloading and movement of waste around the site resulted in localised (to the work place) noise impacts, but was not generally noticeable above the general background of noise from the trucks using the site.	There have been no noise complaints received at the facility. The limited noise monitoring undertaken during the Audit Period did not detect any audible noise from the recycling facility.  The Noise controls detailed in the OEMP are considered appropriate for this facility for daytime operations.  The noise monitoring undertaken to date is limited and does not provide a sufficient data to verify compliance with the noise limits set in the EPL.	Compliance	
	(b) minimise the noise impacts of the Development during adverse meteorological conditions;		3. Section 4.8 Operations Environmental Management Plan.			There is no definition of "adverse metrological conditions" and no specific control actions proposed in the OEMP to deal with noise mitigation during adverse weather conditions.  The Auditor could not verify compliance with this Condition.	Non Compliance	1.Develop an appropriate definition of "adverse metrological conditions". This should include wind speed and direction criteria. 2. Identify the actions to be taken to minimise noise impacts on the identified sensitive receivers and update the Section 4.8 of the OEMP.	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(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				1. The key noise suppression equipment at the facility are truck and plant exhausts. 2. No temporary noise barriers are used at this facility. 3. No excessive noise emissions were detected by the Auditor during the Audit.	No excessive noise emissions were detected by the Auditor.	Compliance	
		(d) regularly assess noise emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.					There are no routine environmental inspections (daily or weekly) undertaken at this facility. While quarterly noise monitoring is scheduled, that monitoring is not sufficient to guide day to day activities on site.	Non Compliance	1. Prepare a daily "environmental inspection checklist" for site management to complete. Include noise generation and noisy work locations. 2. Provide training to site management / supervisors in assessing (by observation) noisy activities that may result in excessive noise emissions and noise mitigation strategies.
Schedule 2 Condition B70	Operational Noise Limits	The Applicant must ensure that noise generated by operation of the Development does not exceed the noise limits in Table 3.		1. Noise monitoring reports (up loaded to the Benedict Website)			Quarterly noise monitoring is undertaken by EMM Consultants. The results of the monitoring are uploaded to the Benedict Website.	Compliance	
Schedule 2 Condition B71	Vibration	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, German Standard DIN 4150 Part 3 Structural Vibration in Buildings. Effects on Structures; and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: A Technical Guideline (Department of Environment and Conservation, 2006).			1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works that could result in vibration impacts have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	Not Triggered	
Schedule 2 Condition B72	Fire Management	Prior to the commencement of operations, the final design of the development must be finalised in consultation with and to the satisfaction of the Secretary and include suitable additional provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of Volume One of the National Construction Code (NCC) Series.			1. Correspondence following review of draft report (A Campbell): The expansion project did not include any erection of new structures or increase the quantity of waste stored on site at anyone time. DPIE did review as built drawings (refer construction certificate). In accordance with B43, DPIE also reviewed the site's fire hydrant and fire emergency exit plans contained in Appendix 2 of the ERP prior to endorsing the OEMP and subplans.		The expansion project has not involved the construction of new facilities. Therefore this condition has not be triggered.	Not Triggered	
		In particular, the following matters must be addressed: (a) Clauses E1.10 and E2.3 of Volume One of the NCC be complied with to the meet the operational requirements of FRNSW;		1. Section 4.12 of OEMP and Fire Safety Certificate which notes compliance with essential fire safety measures.			The fire safety requirements of FNSW have been addressed.	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(b) the stockpile storage within any building and/or open yard storage on the allotment be limited in size and volume and arranged to minimise fire spread;				<p>1. During the audit, five potentially combustible stock piles were sighted by the Auditor: a)timber (pallets etc), b) trees waste (Photo #16), c) mulch d)shredded timber (Photo #17) and e) a small stockpile of tyres (Photo # 8).</p> <p>The pallet stockpile and tyre stockpiles were separated from other stockpiles and access by FRNSW would be clear. The tree wastes, shredded timber and mulch stockpiles (located to the north of the fuel storage area) were not separated and access by FRNSW vehicles if a fire was to break out would be constrained.</p>	The fire safety requirements of FNSW have been addressed.	Compliance	1. Ensure that all potentially combustible stockpiles are adequately separated to prevent the spread of fire and to allow clear access to FRNSW vehicles directly to the Stockpile.
		(c) the arrangement of stockpiles of combustible material, stored externally, on the allotment be sufficiently separated to permit FRNSW vehicle access between stockpiles;				<p>1. During the audit, five potentially combustible stock piles were sighted by the Auditor: a)timber (pallets etc), b) trees waste (Photo #16), c) mulch d)shredded timber (Photo #17) and e) a small stockpile of tyres (Photo # 8).</p> <p>The pallet stockpile and tyre stockpiles were separated from other stockpiles and access by FRNSW would be clear. The tree wastes, shredded timber and mulch stockpiles (located to the north of the fuel storage area) were not separated and access by FRNSW vehicles if a fire was to break out would be constrained.</p>	At the time of the Audit clear access to all potentially comustible stockpiles was not maintained.	Non Compliance	1. Ensure that all potentially combustible stockpiles are adequately separated to prevent the spread of fire and to allow clear access to FRNSW vehicles directly to the Stockpile.
		(d) the site must be serviced by a fire hydrant system that has a minimum water supply capable to extinguishing the sites largest fire load stockpile;				1. a Fire Hydrant System	A system of fire hydrants has been installed at the facility.	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(e) buildings which store recyclable material must include a smoke hazard system that facilitates FRNSW firefighting operations;			1. Interview (A. Campbell, Environmental Compliance Officer) -Infrared Smoke detectors have been installed in the Waste Reveal Shed. There are 4 cameras in the shed monitoring the temperature, of a fire is detected the sprinklers go off to prevent fire.  The site manager has an app installed on his phone and can access temperatures data remotely.  The system is also monitored by an external company on 24 hour basis and the company will contact site managers and fire brigade should the system be activated.	1. Infrared Smoke detectors are located in the Waste Reveal Shed.	Infrared Smoke detectors have been installed in the Waste Reveal Shed.	Compliance	
		(f) if deemed necessary by the Secretary, by virtue of applying Clauses E1.10 and E2.3 to the Development, that any significant building used to process recyclable material is provided with an appropriate fire suppression system; and				1. Fire water sprays are installed within the waste reveal shed.		Compliance	
		(g) the containment on-site of fire water run-off.				1. All fire water would flow into the perimeter drain and final sediment basin and would be contained there.		Compliance	
Schedule 2 Condition B73	Aboriginal Heritage	If Aboriginal objects are uncovered during construction work in the immediate area, work must stop and the Regional Operations Group of the OEH, Council and the Registered Aboriginal Parties are to be consulted.			1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works that could result in vibration impacts have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	Not Triggered	
Schedule 2 Condition B74	Hazards and Risk Dangerous Goods	The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.				1. Dangerous Goods (fuels and oils) are stored at the diesel storage area and within the Maintenance Shed. The small quantities of oils and greases held were well below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines.	Quantities of prescribed dangerous goods held on site were below the guidelines thresholds.	Compliance	
Schedule 2 Condition B75		Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with: (a) all relevant Australian Standards;				1. Dangerous Goods (fuels and oils) are stored at the diesel storage area and within the Maintenance Shed. The small quantities of oils and greases held were well below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines.	The storage of diesel, oils and lubricants was in accordance with the Australian Dangerous Goods Code.	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and				1. The diesel tank bund volume (estimated by the Auditor) is approximately (125 m <sup>2</sup> x 0.2m) 0.250 m <sup>3</sup> . 2. The Volume of fuel stored in the tank is 26,750 litres (0.267 m <sup>3</sup> ). 3. The Diesel tank is self bundled.	The fuel storage bund volume may be insufficient to meet the 110% requirement of the Australian Dangerous Goods code, however the diesel tank is self bundled and meets the requirements of AS1940.	Compliance	
		(c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA,1997).				1.. The Diesel tank is self bundled.	The fuel storage bund volume may be insufficient to meet the 110% requirement of the Australian Dangerous Goods code, however the diesel tank is self bundled and therefore the additional storage volume and the design of the tank satisfies the requirements of the Code.	Compliance	
Schedule 2 Condition B76	Bunding	The Applicant must store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual (DECC, 2007) (as may be updated or replaced from time to time).				1. Dangerous Goods (fuels and oils) are stored at the diesel storage area and within the Maintenance Shed. The (self bundled) diesel tank is located within a bund. Oils and greases stored within the maintenance shed are stored on bunded pallets.	The storage of diesel, oils and lubricants are stored within appropriate bunds.	Compliance	
Schedule 2 Condition B77		Any works carried out on the site that involve the disturbance of (or contact with) soil or groundwater are to be carried out in accordance with the requirements of the report titled Site Management Plan for Subsurface Disturbance Activities, McIntosh Drive Mayfield NSW. Ref: N4113204_SMP_Rev4_2Oct09, prepared by AECOM Pty Ltd, dated 2 October 2009.			1. Interview (A. Campbell, Environmental Compliance Officer) - no excavations or other works requiring contact with contaminated soils or groundwater have been undertaken during the Audit Period.		No works requiring contact with or disturbance of contaminated soils or groundwater have been undertaken during the Audit Period.	Not Triggered	
Schedule 2 Condition B78	Contamination	Prior to the commencement of operations, the main processing building and segregated heavy waste processing and stockpiling area must be sealed with either asphalt or concrete to minimise infiltration of surface water to groundwater.			1. Interview (A. Campbell, Environmental Compliance Officer) a) All roads have existing bitumen from previous owners. No roads need sealing. b) Hand unload shed all concrete, inner bund (potentially contaminated area) concreted, north western corner (end of hand unload shed), concreted.	1. The internal roads (to the weighbridge and waste unloading shed) are sealed. The designated car parking areas are sealed.	The internal roads (to the weighbridge and waste unloading shed) are sealed. The designated car parking areas are sealed.	Compliance	
Schedule 2 Condition B79		Any works carried out on the site that involve the disturbance of (or contact with) soil or groundwater are to be carried out in accordance with the requirements of the report titled Site Management Plan for Subsurface Disturbance Activities, McIntosh Drive Mayfield NSW. Ref: N4113204_SMP_Rev4_2Oct09, prepared by AECOM Pty Ltd, dated 2 October 2009			1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	Not Triggered	



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition B80		The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Plan prepared by Terras Landscape Architects dated 9 September 2015 in Appendix A.		1. Landscape Management Plan (Appendix J of the OEMP)		1. Screening vegetation sighted conforms with the requirements of the LMP.	Screening vegetation sighted conforms with the requirements of the LMP.	Compliance	
Schedule 2 Condition B81	Visual Amenity Landscaping	The Applicant must ensure the lighting associated with the Development: (a) complies with the latest version of AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting;			1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	Not Triggered	
		(b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network including at night; and				1. External building lighting is not directed off-site.	External building lighting is not directed off-site.	Compliance	
		(c) is not installed on the exterior of the Development and does not flash, chase or scintillate or contain promotional material of a visually intrusive nature.				1. There is no lighting external to the facility.	There is no lighting external to the facility.	Compliance	
Schedule 2 Condition B82	Lighting	The Applicant must: (a) maintain the 1.8 m perimeter fence and security gates on the site in accordance with Council's requirements; and (b) ensure the security gates are locked whenever the site is not in operation or unattended.				1. The site is securely fenced and gates are lockable.	The site is securely fenced and gates are lockable.	Compliance	
Schedule 2 Condition B83	Site Security	The Applicant must consult with the community regularly throughout the Development, including consultation with the nearby, adjacent landowners, sensitive receivers, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders.			1. Interview (A. Campbell, Environmental Compliance Officer) - Neighbours were consulted regarded the increased tonnage as part of the project approval process. Benedict webpage has phone numbers listed for central point for contact from the community. Also sign at the front of site has contact numbers listed. Consultation will be made with neighbours should a 24 hour waste receival period need to occur, but so far has not occurred.		There are no plans by Benedict to commence regular consultation with interested parties. Condition B83 is however vague and it is unclear as to the intention of this Condition, in particular the triggers for and frequency of consultation.	Non Compliance	1. See clarification the intent of Condition B83 from DPIE as the triggers for consultation
Schedule 2 Condition C1	Construction Environmental Management Plan	The Applicant must prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Secretary.			1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	Not Triggered	
		The CEMP must: (a) be approved by the Secretary prior to the commencement of construction;			1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	Not Triggered	
		(b) identify the statutory approvals that apply to the Development;			1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	Not Triggered	

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(c) describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages in particular how the sealing works will be staged and any associated impacts on operation, construction of surface water infrastructure must also be addressed;		1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	<b>Not Triggered</b>	
		(d) outline all environmental management practices and procedures to be followed during construction works associated with the Development;		1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	<b>Not Triggered</b>	
		(e) detail how unexpected finds, traffic, erosion and sedimentation and noise will be managed;		1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	<b>Not Triggered</b>	
		(f) include a complaints handling procedure;		1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	<b>Not Triggered</b>	
		(g) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts; and		1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	<b>Not Triggered</b>	
		(h) describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development.		1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	<b>Not Triggered</b>	
Schedule 2 Condition C2		As part of the CEMP required under Condition C1 of this consent, the Applicant must include the following: (a) Erosion and Sediment Control Plan (see Condition B16); (b) Unexpected Finds Protocol (see Condition B79).		1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	<b>Not Triggered</b>	
Schedule 2 Condition C3		The Applicant must carry out the construction of the Development in accordance with the CEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.		1. Interview (A. Campbell, Environmental Compliance Officer) - no construction works have been undertaken during the audit period.		No construction works were being undertaken during the audit site inspection. No significant construction works were undertaken under this approval.	<b>Not Triggered</b>	

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition C4	Operational Environmental Management Plan	The Applicant must prepare an Operational Environmental Management Plan (OEMP) to the satisfaction of the Secretary.	1. Operational Environmental Management Plan 2. Letter from DPIE (Mr B. Zhang) to Benedict (Mr E Dupere) titled "Mayfield West Recycling Facility Environmental Management Plan", dated 25 September 2018. The letter confirmed approval of the OEMP and subplans.			The Operational Environmental Management Plan has been prepared in accordance with Condition C4.	Compliance	
		The OEMP must: (a) be approved by the Secretary prior to the commencement of operations;	1. Operational Environmental Management Plan			The OEMP was approved by DPE on 25 September 2018. The expanded site operations commenced on 27 September 2018.	Compliance	
		(b) be prepared by a suitably qualified and experienced expert;	1. Operational Environmental Management Plan			The OEMP was prepared by Benedict personnel. The author(s) of the OEMP were EMM Consulting and Benedict Recycling Operations Planning Support Manager. EMM Consulting are appropriately qualified and experienced in the preparation of management plans.	Compliance	
		(c) provide the strategic framework for environmental management of the Development;	1. Operational Environmental Management Plan			Section 2 of the OEMP provides details of the strategic framework for environmental management of the Development.	Compliance	
		(d) identify the statutory approvals that apply to the Development;	1. Operational Environmental Management Plan			Section 2 of the OEMP provides details of the statutory approvals that apply to the Development.	Compliance	
		(e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;	1. Operational Environmental Management Plan			Section 5.1 of the OEMP provides details of the describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development.	Compliance	
		(f) 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	1. Operational Environmental Management Plan			Section 5 of the OEMP provides details of the consultation and communications strategy to be implemented over the life of the Development.	Compliance	



Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(g) include the following environmental management plans: (i) Waste Management Plan (see Condition B13); (ii) Surface Water Characterisation and Mitigation Plan (see Condition B33); (iii) Operational Traffic and Pedestrian Management Plan (see Condition B50); (iv) Air Quality Management Plan (see Condition B57); and (v) Conceptual Decommissioning Management Plan (see Condition B84).	1. Operational Environmental Management Plan			Appendices D through G and Appendix I of the OEMP provides each of the required sub-plans.	Compliance	
Schedule 2 Condition C5		The Applicant must carry out the construction of the Development in accordance with the OEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	1. Operational Environmental Management Plan			All elements of the OEMP and Subplans were not being implemented at the time of the Audit.	Non Compliance	1. Refer to the non-compliance recommendations above.
Schedule 2 Condition C6	Compliance Register	C6. The Applicant must submit a Compliance Register Table to the Secretary with any Environmental Management Plans, which details where the relevant conditions have been addressed within the Environmental Management Plan.	1. Operational Environmental Management Plan			Appendix A of the OEMP provides a reference table describing where each Condition of the Approval is covered in the OEMP.	Compliance	
Schedule 2 Condition C7	Management Plan Requirements	The Applicant must ensure that the environmental management plans required under Condition C4 of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include:	1. Operational Environmental Management Plan and Sub-Plans			The OEMP and Subplans have been prepared by suitably qualified persons. Details are provided in the relevant Conditions above.	Compliance	
		(a) detailed baseline data; NSW Government 16 Mayfield West Resource Recovery Facility Department of Planning and Environment (SSD 7698)	1. Operational Environmental Management Plan and Sub-Plans				Compliance	
		(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; and (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;	1. Operational Environmental Management Plan and Sub-Plans			Each Subplan provides a summary of the relevant Conditions of Approval, emission limits, and performance indicators.	Compliance	
		(c) a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria;	1. Operational Environmental Management Plan and Sub-Plans			Each Subplan provides a summary of the management measures proposed to mitigate adverse environmental impacts.	Compliance	
		(d) a program to monitor and report on the: (i) impacts and environmental performance of the Development; and (ii) effectiveness of any management measures (see (c) above)	1. Operational Environmental Management Plan and Sub-Plans			Each Subplan provides a description of monitoring and measurements proposed to determine the effectiveness of the plan and to monitor the	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
							environmental impacts of the Development.		
		(e) a contingency plan to manage any unpredicted impacts and their consequences;		1. Operational Environmental Management Plan and Sub-Plans			Each Subplan provides a description of monitoring and measurements proposed to determine the effectiveness of the plan and to monitor the environmental impacts of the Development.	Compliance	
		(f) a program to investigate and implement ways to improve the environmental performance of the Development over time; (g) 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		1. Operational Environmental Management Plan and Sub-Plans			Each Subplan provides a description of contingency action to manage unpredicted impacts and their consequences	Compliance	
		(h) a protocol for periodic review of the plan.		1. Operational Environmental Management Plan and Sub-Plans			The OEMP and each Subplan provides a protocol for periodic review of the plan.	Compliance	
Schedule 2 Condition C8	Revision of Plans	Within three months of: (a) approval of a modification; (b) approval of an annual review under Condition C9; (c) submissions of an incident report under Condition C11; or (d) completion of an audit under Condition C13.  the Applicant must review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.					There have been no triggers for the review of the OEMP or Subplans to date. The Auditor notes that the first full year (2019) Annual Review is due for submission to DPIE in early 2020.	Not Triggered	
Schedule 2 Condition C9	Annual Review	Each year, the Applicant must review the environmental performance of the Development to the satisfaction of the Secretary.		1. 2018 Annual Review covering the period 13 March 2018 to 31 December 2018.			The Annual review for 2018 was prepared and submitted to DPE.	Compliance	
		This review must: (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;		1. 2018 Annual Review covering the period 13 March 2018 to 31 December 2018.			Section 2 of the 2018 AR describes the development that was carried out in the 2018 calendar year and provides an overview of the proposed operations for the 2019 calendar year.	Compliance	
		(b) provide a conditions compliance report which tracks the compliance of the development with the conditions of this approval;		1. 2018 Annual Review covering the period 13 March 2018 to 31 December 2018.			Section 3 of the 2018 AR provides a conditions compliance report which tracks the compliance of the development with the conditions of this approval.	Compliance	

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(c) 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: (i) the relevant statutory requirements, limits or performance measures/criteria; (ii) requirements of any plan or program required under this consent; (iii) the monitoring results of previous years; and (iv) the relevant predictions in the EIS;	1. 2018 Annual Review covering the period 13 March 2018 to 31 December 2018.			Section 4 of the 2018 AR review of the monitoring results and complaints records (one dust related complaint) of the Development over the previous calendar year.	Compliance	
		(d) detail and provide evidence for the number of days crushing and the 24-hour waste receival operations has occurred;	1. 2018 Annual Review covering the period 13 March 2018 to 31 December 2018.			Section 5 of the 2018 AR provides a statement (no crushing works undertaken) of the number of days crushing and the 24-hour waste receival operations has occurred;	Compliance	
		(e) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;	1. 2018 Annual Review covering the period 13 March 2018 to 31 December 2018.			Section 6 of the 2018 AR describes the non-compliances from the previous year (no non-compliances were recorded).	Compliance	
		(f) identify any trends in the monitoring data over the life of the Development;	1. 2018 Annual Review covering the period 13 March 2018 to 31 December 2018.			Section 7 of the 2018 AR provided an overview of the monitoring data trends.	Compliance	
		(g) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and	1. 2018 Annual Review covering the period 13 March 2018 to 31 December 2018.			Section 8 of the 2018 AR described any identified discrepancies between the predicted and actual impacts of the Development No discrepancies were identified.	Compliance	
		(h) describe what measures will be implemented over the next year to improve the environmental performance of the Development.	1. 2018 Annual Review covering the period 13 March 2018 to 31 December 2018.			Section 9 of the 2018 AR described measures that would be implemented over the next year to improve the environmental performance of the Development.	Compliance	
Schedule 2 Condition C10	Incident Reporting	The Applicant must notify the Secretary and any other relevant agencies of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment associated with the Development immediately after the Applicant becomes aware of the incident.	1. 2018 Annual Review covering the period 13 March 2018 to 31 December 2018. 2. Complaints Register.			A compliant regarding dust emissions was received by the EPA (Complaints line). A written report was provided to the EPA outlining the actions taken to prevent a further excessive dust emissions.	Compliance	
Schedule 2 Condition C11		Within seven days of the date of this incident, the Proponent must provide the Secretary and any relevant agencies with a detailed report on the incident.	1. 2018 Annual Review covering the period 13 March 2018 to 31 December 2018. 2. Newcastle - Pollution Incident Report _Dust 19102018.			Following the receipt of the dust complaint from the EPA, Benedict investigation the incident and prepared and issued a report to the EPA.  The incident was not reported to and subsequent report was not issued to DPIE.	Non Compliance	1. Ensure that all environmental and compliance related incidents are reported to DPIE.
Schedule 2 Condition C12	Regular Reporting	The Applicant must 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.	<a href="http://www.benedict.com.au/about/policies-compliance/">www.benedict.com.au/about/policies-compliance/</a>			Refer to Condition C15 below.	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Schedule 2 Condition C13	Independent Environmental Audit	Within one year of the commencement of operations, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the Development.		1. Email from A Campbell (Benedict) to K. Holmes (Barnett and May), titled " <i>RE:IEA-Benedict - Mayfield West</i> ", dated 4 September. The email commissioned Barnett and May to undertake the IEA.			The first Independent Environmental Audit required under this approval (this Audit) was commissioned on 4 September 2019.	Compliance	
		This audit must: (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;		1. Letter from DPIE (L. Cook) to Benedict (A Campbell), titled " <i>Mayfield West Recycling Facility (SSD 7698) Independent Environmental Audit - Audit Team Endorsement</i> ", dated 30 August 2019.			DPIE endorsed the appointment of the Barnett and May Audit team on 30 August 2019.	Compliance	
		(b) include consultation with the relevant agencies;					The Auditor has emailed DPIE, EPA and Council seeking input into the planning of the Audit on 16 September 2019 and again on 1 November 2019.	Compliance	
		(c) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals);					The approved scope of the Audit covers the requirements of this Condition.	Compliance	
		(d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and					The approved scope of the Audit covers the requirements of this Condition.	Compliance	
		(e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.					The approved scope of the Audit covers the requirements of this Condition.	Compliance	
Schedule 2 Condition C14		Within three months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.					Post Audit requirement	Not Triggered	
Schedule 2 Condition C15	Access to Information	The Applicant must: (a) make copies of the following publicly available on its website: (i) the documents referred to in Condition A2;		<a href="http://www.benedict.com.au/about/policies-compliance/">www.benedict.com.au/about/policies-compliance/</a>			This condition requires Benedict to upload copies of the following Documents: a) Conditions of Consent - these are contained in the OEMP that has been uploaded to the Website. b) EIS - a copy of the EIS <b>had not been</b> uploaded to the Website at the time of the audit. c) RTS (Appendix A to the Approval) - uploaded to the Website d) Amended Application (Appendix A to the Approval) - uploaded to the Website e) Management and Mitigation Measures (Appendix B to the Approval) - uploaded to the Website.	Non Compliance	1. Upload a copy of the EIS to the Benedict Website.

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(ii) all current statutory approvals for the Development;	<a href="http://www.benedict.com.au/about/policies-compliance/">www.benedict.com.au/about/policies-compliance/</a>			The Conditions of Consent and the current EPL have been uploaded to the Website.	Compliance	
		(iii) all approved strategies, plans and programs required under the conditions of this consent;	<a href="http://www.benedict.com.au/about/policies-compliance/">www.benedict.com.au/about/policies-compliance/</a>			The OEMP and all subplans have been uploaded to the Website, except the Landscape Management Plan. The version of the OEMP does not contain the LMP at Appendix J.	Non Compliance	1. Upload a copy of the LMP to the Benedict Website.
		(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;	<a href="http://www.benedict.com.au/about/policies-compliance/">www.benedict.com.au/about/policies-compliance/</a>			A summary of the environmental monitoring undertaken has been uploaded to the Website.	Compliance	
		(v) a complaints register updated on a monthly basis;	<a href="http://www.benedict.com.au/about/policies-compliance/">www.benedict.com.au/about/policies-compliance/</a>			A complaints register has been uploaded to the Website. The complaints register was up to date at the time of the Audit.	Compliance	
		(vi) the annual reviews of the Development;	<a href="http://www.benedict.com.au/about/policies-compliance/">www.benedict.com.au/about/policies-compliance/</a>			The 2018 Annual Review has been uploaded to the Website.	Compliance	
		(vii) any independent environmental audit of the Development and the Applicant's response to the recommendations in any audit; and	<a href="http://www.benedict.com.au/about/policies-compliance/">www.benedict.com.au/about/policies-compliance/</a>			No IEAs have been completed to date.	Not Triggered	
		(viii) any other matter required by the Secretary	<a href="http://www.benedict.com.au/about/policies-compliance/">www.benedict.com.au/about/policies-compliance/</a>			No other uploads have been requested by DPIE.	Not Triggered	
		(b) keep this information up to date, to the satisfaction of the Secretary					Noted	
Appendix B General		A public hand unloading area has been established outside of the northern end of the main processing shed to separate contactor and public tipping for safety reasons. Only light vehicles and trailers are permitted in the public hand unloading area. No heavy vehicles are permitted in this area.	1. Waste Management Plan		1. Public hand unloading area is located inside the waste unloading shed (northern end) and is separated from the heavy vehicle unloading areas.	Public hand unloading area is located inside the waste unloading shed (northern end) and is separated from the heavy vehicle unloading areas.	Compliance	
		Currently unsealed areas within the site that are not part of the 'Area to remain unsealed and vegetated' will be progressively sealed with concrete or asphalt.		1. Interview (H. Nowlan Site Manager) - progressive sealing of external areas is progressing.		Progressive sealing of external areas is progressing.	Compliance	
		Trucks delivering or picking up stored items will access the storage compounds on sealed access roads.			1. Both the site access road and on-site roads are sealed.	All access roads area sealed.	Compliance	
		Lighting in the southern car park will be designed to comply with AS 1158.				No carpark specific lighting has been installed.	Not Triggered	
Appendix B Rubbish and light waste		All light waste (including light waste within co-mingled waste) will be tipped inside the main processing shed.	1. Waste Management Plan		1. All light waste delivered during the Audit was unloaded inside the waste unloading shed.		Compliance	
		The access road between McIntosh Drive and the recycling facility site will be inspected daily to ensure that there is no rubbish is left along the access road (most likely food and beverage waste from drivers).				No daily environmental inspections are undertaken.	Non Compliance	1. Prepare and implement a weekly environmental compliance inspection that access road litter.



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		The site boundary fences will be inspected daily and any wind-blown light waste within the site will be removed and sent to the main processing shed.					No daily environmental inspections are undertaken.	Non Compliance	1. Prepare and implement a weekly environmental compliance inspection that covers on-site litter.
		Any rubbish found along the access road between McIntosh Drive and the recycling facility site will be removed promptly.					No daily environmental inspections are undertaken.	Non Compliance	1. Prepare and implement a weekly environmental compliance inspection that covers on-site litter.
Appendix B Security		The site's security measures will continue to be implemented, including deployment of guards when the site is not operating (including at night), use of remotely accessed security cameras and maintenance of fences and gates.				1. Site security measures sighted include site fencing, security cameras and lockable access gate.	Site security features are in place.	Compliance	
Appendix B Air Quality		The following management measures will continue to be implemented to minimise air quality impacts: • all existing sealed/hardstand areas will be retained;		1. Air Quality Management Plan		1. Hard stand areas have been retained.	Hard stand areas have been retained.	Compliance	
		• water sprays will be used over any other bare or unsealed surfaces that have not yet been sealed and have the potential to generate unacceptable amounts of dust;		1. Air Quality Management Plan		1. Water sprays and mobile water cart were in operation at the time of the Audit.	Water sprays are in use at the Recycling Facility.	Compliance	
		• all vehicle movements will be restricted to designated routes marked out by appropriate signage and fencing using sealed internal roads;		1. Traffic and Pedestrian Management Plan		1. On-site roads and directional signage.	Directional signage and information provided to drivers as part of the site induction provides information on designated on-site routes.	Compliance	
		• access to unsealed areas will be prevented;		1. Traffic and Pedestrian Management Plan	1. Correspondence following review of draft report (A Campbell): During the driver induction, drivers are shown routes to take within the site. Operational staff also direct on the ground. It is impractical to place barriers up when stockpiles are continually moving within the site.		Sufficient instruction and supervision has been provided to prevent unnecessary access to unsealed areas on the site	Compliance	
		• water sprays will be used at stockpiles, crushing and screening plants and during material handling as necessary;		1. Air Quality Management Plan		1. Water sprays were in use at the time of the Audit, however no sprays were observed operating at the screening plants.	Screening plants are not provided with dust suppression sprays.	Compliance	
		• a wheel wash in the weighbridge area will be used if required to clean truck tyres to prevent mud or sediment being carried to and deposited on the access road (and public roads); and		1. Air Quality Management Plan		1. The wheel wash was operational at the time of the Audit.	An operational wheel wash has been installed at the facility.	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<ul style="list-style-type: none"> <li>existing sheds will be used to undertake particulate generating activities where possible. Irrigation sprays will only used when the surface of a stockpile is dry and irrigation will be ceased when the surface is wet.</li> </ul>		1. Air Quality Management Plan		1. Waste unloading occurs within the waste receival shed. Dust suppressing water sprays are used with in the shed and the stockpile areas.	Waste unloading and the use of water sprays meet the requirements of this Commitment.	Compliance	
Appendix B Greenhouse Gases		The following management measures will continue to be implemented to minimise greenhouse gases emissions: <ul style="list-style-type: none"> <li>on-site equipment will be regularly maintained and serviced to maximise fuel efficiency;</li> </ul>				1. Plant maintenance shed	Routine plant maintenance is undertaken.	Compliance	
		<ul style="list-style-type: none"> <li>vehicle kilometres travelled on-site will be minimised;</li> </ul>					This condition is not auditable.	Not Applicable	
		<ul style="list-style-type: none"> <li>energy efficiency will be progressively reviewed and, where necessary, changes will continue to be implemented throughout the life of the operations.</li> </ul>					An energy efficiency review has not be undertaken.	Non Compliance	1. Prepare and implement an energy efficiency review.
Appendix B Noise		The following management measures will continue to be implemented to minimise noise emissions: <ul style="list-style-type: none"> <li>operations will be limited to the hours and types of operation approved; and</li> </ul>		1. Complaints Register 2. Operational Environmental Management Plan.			The facility has operated with the permitted hours.	Compliance	
		<ul style="list-style-type: none"> <li>machinery will be correctly operated and maintained. Regular noise monitoring is conducted by the Site Leading Hand/Supervisor and any noise complaints received are referred to the Site Leading Hand/Supervisor and to the Site Manager.</li> </ul>		1. Complaints Register 2. Operational Environmental Management Plan.			There are no routine environmental inspections (daily or weekly) undertaken at this facility. While quarterly noise monitoring is scheduled, that monitoring is not sufficient to guide day to day activities on site.	Non Compliance	1. Prepare a daily "environmental inspection checklist" for site management to complete. Include noise generation and noisy work locations. 2. Provide training to site management / supervisors in assessing (by observation) noisy activities that may result in excessive noise emissions and noise mitigation strategies.
		The two mobile screens in the segregated heavy waste processing and stockpiling area, the crusher/screen and the shredder will be operated no further south than 130 m from the northern site boundary.		1. Complaints Register 2. Operational Environmental Management Plan.			1. The shredder operations were occurring within 130 m from the northern site boundary.	Compliance	
		The two mobile screens in the segregated heavy waste processing and stockpiling area will not be operated simultaneously with the crusher/screen and shredder.			1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the audit period.		No crushing has been undertaken at the facility during the Audit Period.	Not Triggered	

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Appendix B Traffic		<p>Site generated traffic will continue to be formally directed to continue to travel only via Steel River Boulevard and McIntosh Drive when travelling within the Steel River estate.</p> <p>Benedict Recycling will continue to maintain the access road between McIntosh Drive and the Recycling Facility site in a fit and proper condition and to a suitable standard, repairing it when required at no cost to Ausgrid. This will include repairing any minor areas of surface rutting using 50 mm hot mix asphalt.</p> <p>Trucks will not be allowed to queue on the access road between McIntosh Drive and the Recycling Facility site.</p>	<p>1. Traffic and Pedestrian Management Plan</p> <p>2. Operational Environmental Management Plan</p>		<p>1. Site Access Road (truck queueing observed)</p> <p>2. No significant damage to the site access road was observed during the audit.</p>	<p>Traffic entering the site use Steel River Boulevard ad McIntosh Drive</p> <p>At the time of the Audit trucks were queued on the site access road.</p>	Non Compliance	<p>1. Refer to Condition B49 (d)</p> <p>2. Provide all heavy vehicle operators using the site with a copy of the Drivers Code of Conduct as part of the Site Induction process.</p>
Appendix B Water		The perimeter drain, installed prior to Benedict Recycling occupying the site, captures runoff from all active areas of the site. The site soil and water management system includes:	1. Surface Water Characterisation and Mitigation Plan.		1. The Surface water management system meets the general requirements of the SWCMP.	Surface water generated off-site will not flow onto the Benedict site under normal storm conditions.	Compliance	
		• prevention of runoff from external areas discharging across the site;						
		• a perimeter drain with seven sedimentation basins;	1. Surface Water Characterisation and Mitigation Plan.		1. The perimeter drain includes sediment retention berms in accordance with the SWCMP.	The perimeter drain includes sediment retention berms in accordance with the SWCMP.	Compliance	
		• a final sedimentation basin with outlet controls;	1. Surface Water Characterisation and Mitigation Plan.		1. The final sediment control basin is sealed (concrete) and the outlet from the basin is fitted with a shut off valve that is kept closed at all times (expect during controlled discharges from the basin).	The basin is designed and operated in accordance with the SWCMP.	Compliance	
		• sock filters treating runoff prior to discharge into the perimeter drain;	1. Surface Water Characterisation and Mitigation Plan.		1. During the site inspection no sock filters were in place along the edge of the perimeter drain.	The required sock filters were not in place.	Non Compliance	1. install (and maintain) sock filters along the inside edge of the perimeter drain.
		• flocculation of stored water in the basins as necessary; and	1. Surface Water Characterisation and Mitigation Plan.			There have been no discharges from the site during the Audit Period.	Not Triggered	
		• pumping water in the final sedimentation basin, after testing, to the discharge chamber to reduce water levels in the basin prior to forecast rain if required.	1. Surface Water Characterisation and Mitigation Plan.			There have been no discharges from the site during the Audit Period.	Not Triggered	
		Only commercially available non-toxic flocculants will be used at the site. Actions that will continue to be implemented to prevent impacts to water include:	1. Surface Water Characterisation and Mitigation Plan.		1. A sump from the stockpile area collects surface water which is pumped into above ground storage tanks. That water is used for dust suppression. There is no process water requirement (other than dust suppression) at the facility.	Surface water is collected and used for dust suppression.	Compliance	
		• water is used for dust suppression but is not used for product processing;						
		• there are no significant excavations within the site;		1. Interview (A. Campbell, Environmental Compliance Officer) - no excavations or other	1. No excavations were observed during the site inspection.	There were no excavations were observed during the site inspection.	Compliance	



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
					works requiring contact with contaminated soils or groundwater have been undertaken during the Audit Period.				
		<ul style="list-style-type: none"> <li>regularly maintaining sock filters;</li> </ul>					There are no sock filters along the edge of the perimeter drain.	<b>Not Triggered</b>	
		<ul style="list-style-type: none"> <li>removal of sediment from the sedimentation basins when the sediment depth is greater than 200 mm;</li> </ul>				1. The sediment basins contained low levels of accumulated sediments.	The basin sediment levels were low at the time of the Audit.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>recycling of sediment if of appropriate quality or disposal to a facility approved to accept contaminated sediment;</li> <li>water in the final sedimentation basin is tested before a controlled discharge and, unless it overflows, is only be discharged if it meets water quality trigger values; and</li> </ul>		1. Surface Water Characterisation and Mitigation Plan.		1. No sediment accumulation was observed.	No sediment from the basins was observed at the site.	<b>Not Triggered</b>	
		<ul style="list-style-type: none"> <li>water in the sedimentation basins is used for dust suppression to minimise the mains water required;</li> </ul>		1. Surface Water Characterisation and Mitigation Plan.		1. A sump from the stockpile area collects surface water which is pumped into above ground storage tanks. That water is used for dust suppression. There is no process water requirement (other than dust suppression) at the facility.	Water discharge testing is required by the SWCMP. There have been no discharges from the site during the Audit Period.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>groundwater is not used.</li> </ul>				1. There are no production groundwater bores on-site.	There is no groundwater used at this facility.	<b>Compliance</b>	
		<p>The following actions will be taken as part of the proposal:</p> <ul style="list-style-type: none"> <li>the trees will be removed from the perimeter drain and the perimeter drain will be sealed;</li> </ul>		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. Vegetation that has grown through the perimeter drain has damaged the concrete seal and the drain is no longer impervious. Refer to Photo #10.	1. Maintenance of the perimeter drain has not been undertaken (removal of vegetation and re-sealing of the drain).	<b>Non Compliance</b>	1. Undertake a detailed survey of the perimeter drain, identify all areas where vegetation has damaged the drain or the drain has been otherwise compromised. Remove all of the vegetation and reseal the drain.
		<ul style="list-style-type: none"> <li>the final sedimentation basin will be sealed;</li> </ul>		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. The final sediment control basin is sealed (concrete) and the outlet from the basin is fitted with a shut off valve that is kept closed at all times (expect during controlled discharges from the basin).	The basin is designed and operated in accordance with the SWCMP.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>additional storage volume will be provided as part of the works to seal the drain and final sedimentation basin volume;</li> </ul>		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. The final sediment control basin is sealed (concrete) and the outlet from the basin is fitted with a shut off valve that is kept closed at all times (expect during controlled discharges from the basin).	The basin is designed and operated in accordance with the SWCMP.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>the sedimentation basins in the perimeter drain will be upgraded. Poorly graded rock (50–150 mm diameter) will be used to form the sedimentation basin dams in the perimeter drain. The top of each dam will be approximately 0.5 to 1.0 m wide with the crest level approximately 0.3 m below the top of the perimeter drain to allow overflow</li> </ul>		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. The perimeter drain includes sediment retention berms in accordance with the SWCMP.	The perimeter drain includes sediment retention berms in accordance with the SWCMP.	<b>Compliance</b>	

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		into the next basin when the storage capacity is exceeded;						
		<ul style="list-style-type: none"> <li>the sealed perimeter drain and final sedimentation basin will be inspected monthly to ensure that vegetation is not growing through the seal. If vegetation is found to be growing through the sides of the drain or basin, it will be removed and the seal repaired;</li> </ul>	1. No records of weekly inspection checks were available to the Auditor.			No weekly or monthly inspections of the surface water management system are undertaken and documented.	<b>Non Compliance</b>	1. Prepare and implement a weekly and monthly environmental compliance inspection checklist covering the surface water management system.
		<ul style="list-style-type: none"> <li>the segregated heavy waste processing and stockpiling area will be sealed with concrete or asphalt with the sealed area extending to the perimeter drain;</li> </ul>	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. The heavy waste processing and stockpile area is sealed.	The heavy waste processing and stockpile area is sealed.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>a bund will be erected around the segregated heavy waste processing and stockpiling area directing all runoff from the area to the perimeter drain;</li> </ul>	1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. The bund wall around the heavy waste processing and stockpile area has been installed.	The bund wall around the heavy waste processing and stockpile area has been installed.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>any material in the sealed segregated heavy waste processing and stockpiling area that is not in a stockpile will be removed using a front end loader bucket;</li> </ul>	1. Waste Management Plan.		1. The management of the wastes delivered to the site is generally in accordance with the requirements of the WMP.	The management of the wastes delivered to the site is generally in accordance with the requirements of the WMP.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>the sealed segregated heavy waste processing and stockpiling area will be routinely swept using a sweeper.</li> </ul>			1. At the time of the Audit there was significant accumulation of soil and mud across the external waste storage areas. No evidence of mechanical sweeping was observed.	External storage areas are not regularly mechanically swept.	<b>Non Compliance</b>	1. Review dust management actions including stockpile water sprays and sweeping of internal roads.
		<ul style="list-style-type: none"> <li>bunds will be erected to direct surface runoff away from unsealed areas; and</li> </ul>			1. the site is level and all waste handling areas drain to either the perimeter drain or the sump at the northern end of the site.	The surface water management system has been designed in accordance with the SWCMP.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>concrete will be applied to the floor of the main processing shed where liquids may infiltrate to groundwater, e.g. through cracks.</li> </ul>			1. The main processing shed floor is sealed with concrete.	The main processing shed floor is sealed with concrete.	<b>Compliance</b>	
		<p>The following actions will be taken in respect to water discharge:</p> <ul style="list-style-type: none"> <li>If water levels are between about 2 m and 3 m from the base of the sedimentation basin and meets water quality trigger values, water will be manually discharged from the final sedimentation basin using the outlet valve to maintain a freeboard in the final sedimentation basin.</li> </ul>	1. Surface Water Characterisation and Mitigation Plan.			Water discharge testing is required by the SWCMP. There have been no discharges from the site during the Audit Period.	<b>Not Triggered</b>	
		<ul style="list-style-type: none"> <li>Water in the final sedimentation basin will be tested before a controlled discharge and unless it overflows, it will only be discharged if it meets water quality trigger values.</li> </ul>	1. Surface Water Characterisation and Mitigation Plan.			Water discharge testing is required by the SWCMP. There have been no discharges from the site during the Audit Period.	<b>Not Triggered</b>	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<ul style="list-style-type: none"> <li>When the basin is discharging, daily samples of the discharging water will be collected from the final basin outlet pipe and will be analysed in accordance with the discharge monitoring program.</li> </ul>		1. Surface Water Characterisation and Mitigation Plan.			Water discharge testing is required by the SWCMP. There have been no discharges from the site during the Audit Period.	<b>Not Triggered</b>	
		<ul style="list-style-type: none"> <li>A water level gauge will be installed in the final sedimentation basin.</li> </ul>				1. A water level gauge has been installed in the final sediment basin.	A water level gauge has been installed in the final sediment basin.	<b>Compliance</b>	
		A Surface Water Monitoring and Mitigation Plan will be prepared that details: <ul style="list-style-type: none"> <li>meteorological monitoring;</li> </ul>		1. Surface Water Characterisation and Mitigation Plan.			The SWCMP has been prepared and contains details for metrological monitoring.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>water level monitoring;</li> </ul>		1. Surface Water Characterisation and Mitigation Plan.			The SWCMP has been prepared and contains details for water level monitoring.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>validation monitoring;</li> </ul>		1. Surface Water Characterisation and Mitigation Plan.			The SWCMP has been prepared and contains details for validation monitoring.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>routine monitoring; and</li> </ul>		1. Surface Water Characterisation and Mitigation Plan.			The SWCMP has been prepared and contains details for routine monitoring.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>sediment monitoring.</li> </ul>		1. Surface Water Characterisation and Mitigation Plan.			The SWCMP has been prepared and contains details for sediment monitoring.	<b>Compliance</b>	
		It will provide trigger values and responses, including treatment of site runoff prior to discharge and contingency measures.					The SWCMP has been prepared and contains details action trigger values.	<b>Compliance</b>	
Appendix B Soils and Contamination		No further ground excavation is anticipated so contaminated soil will not be disturbed. However, should excavation be required, the SMP for Subsurface Disturbance Activities (EIS Appendix E) will be implemented.			1. Interview (A. Campbell, Environmental Compliance Officer) - no excavations or other works requiring contact with contaminated soils or groundwater have been undertaken during the Audit Period.		No works requiring contact with or disturbance of contaminated soils or groundwater have been undertaken during the Audit Period.	<b>Not Triggered</b>	
		The following measures will be implemented to prevent site activities exacerbating contamination of the site: <ul style="list-style-type: none"> <li>plant and equipment will be maintained to prevent hydrocarbon leaks;</li> </ul>				1. General site inspection covering plant and equipment.	Plant and equipment is maintained on-site. Based on the Auditor's observations the equipment sighted appeared to be in operable condition.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>plant maintenance will only occur in sealed areas where spills, should they occur, will be contained and cleaned up immediately using a spill response kit;</li> </ul>				1.The tank is a self bunded (commercially available unit) that meets the requirements of AS1940. 2. While that tank is located within a bunded area, the tank is not protected from potential impacts from heavy vehicles. (Photo #12)	The fuel tank has not been provided with impact protection from heavy vehicles.	<b>Non Compliance</b>	1. Install bollards (that meet the requirements of AS3845) to permanently separate heavy vehicles from the fuel tank installation.
		<ul style="list-style-type: none"> <li>a spill response kit will be deployed next to maintenance activities;</li> </ul>				1. The diesel tank installation is located under an appropriately designed and constructed awning.	The diesel tank installation is located under an appropriately designed and constructed awning.	<b>Compliance</b>	
		<ul style="list-style-type: none"> <li>vehicles parked in the storage compounds will be parked on sealed areas; and</li> </ul>				1. The tank is designed to meet the required Australian Standards and is fitted with appropriate gauging.	The tank is designed to meet the required Australian Standards and is fitted with appropriate gauging.	<b>Compliance</b>	

Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<ul style="list-style-type: none"> <li>• maintenance activities that may result in the loss of fluids will be conducted within a shed with a sealed floor and at least 5 m from the nearest open doorway.</li> </ul>	1. No records of weekly inspection checks were available to the Auditor.			No weekly inspections of the fuel tank installation are documented.	Non Compliance	1. Prepare and implement a weekly environmental compliance inspection checklist covering the fuel storage area.
		The diesel tank will be installed in accordance with Australian Standards and will incorporate the following measures: <ul style="list-style-type: none"> <li>• Prevention: <ul style="list-style-type: none"> <li>- overfilling of tanks will be prevented through gauging or monitoring of the tank's contents;</li> </ul> </li> </ul>			1. The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off (safe fill) controls.	The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	Compliance	
		- hoses used for transfer of diesel will be regularly inspected;			1. The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	Compliance	
		tanks, vents and fittings will be inspected regularly and valves will be regularly overhauled (at periods not exceeding 10 years); and				No weekly inspections of the fuel tank installation are documented.	Non Compliance	1. Prepare and implement a weekly environmental compliance inspection checklist covering the fuel storage area.
		there will be regular inspections of the tank and surrounds and any liquid inside the bunded areas will be removed as soon as practicable following established procedures.				No weekly inspections of the fuel tank installation are documented.	Non Compliance	1. Prepare and implement a weekly environmental compliance inspection checklist covering the fuel storage area.
		<ul style="list-style-type: none"> <li>• Protection: <ul style="list-style-type: none"> <li>- the diesel tank will be self-bunded (with a capacity of 10% more than the tank's capacity);</li> </ul> </li> </ul>			1. The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off (safe fill) controls.	The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	Compliance	
		the bund will be large enough to contain a spillage in accordance with the requirement of AS1940 para 5.8;			1. The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off (safe fill) controls.	The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	Compliance	
		the bund drain valve will be kept closed and locked except during supervised drainage, and a sign will be placed to display the need to keep the drain valve closed and locked;			1. The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off (safe fill) controls.	The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	Compliance	
		the tank will be enclosed by Colourbond (or similar) walls to prevent leaks in the site of the tank spraying outside of the bund;			1. The tank installation is not enclosed by walls. The tank sits at the edge of the bunded area.	The tank installation is not enclosed by walls.	Non Compliance	1. Install walls around the tank to prevent any leaks from spraying outside of the bunded area. Note that if the containment area is increased to include the refuelling area, the installation of walls may not be required.
		diesel pumps will be designed such that the discharge pressure cannot exceed design limit of pump or piping in the case of dead heading (shut-off at the pump discharge);			1. The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off (safe fill) controls.	The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		an emergency shut-off device will be provided on each pump;				1. The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off (safe fill) controls.	The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	Compliance	
		provision will be made to quickly shut off the flow of liquid from the storage tank to a consuming device in an emergency. The shut off valve will comply with para 6.3.3 in AS1940, including resistance in a fire; and				1. The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off (safe fill) controls.	The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	Compliance	
		diesel pumps will be designed such that the discharge pressure cannot exceed design limit of pump or piping in the case of dead heading (shut-off at the pump discharge).				1. The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off (safe fill) controls.	The tank is designed to meet the required Australian Standards and is fitted with appropriate fuel shut off controls.	Compliance	
		<ul style="list-style-type: none"> <li>Refuelling: <ul style="list-style-type: none"> <li>mobile plant will be refuelling within a bunded area with runoff from within the bund reporting to a oil-water separator;</li> </ul> </li> </ul>				1. The tank is located with in a bunded area on hard stand. 2. During the Audit, mobile plant was being refuelled. The mobile plant was located outside of the bunded area. Refer to Photo #12.	While the tank is located within a bunded area, heavy plant is refuelled outside of the bund.	Non Compliance	1. Install a bund (or catch drain) around the refuelling pad to ensure that any spills occurring during refuelling can be fully contained.
		the refuelling area will be covered by an awning so that rainwater does not enter the refuelling area;				1.The fuel tank and refuelling area are located underneath and awning.	The fuel tank and refuelling area are located underneath and awning.	Compliance	
		there will be a diesel spill kit stored at the bowser; and				1. A diesel spill kit was located next to the diesel tank. However the kit was not adequately provisioned. There was insufficient spill control and clean-up materials to be effective in the case of a fuel spill.	The spill kit provided for the diesel fuel storage area was not properly provisioned.	Non Compliance	1. Replenish the spill kit at the Diesel storage area. 2. Prepare and implement a weekly environmental compliance inspection checklist that covers spill kit inspection.
		in the case of a spill, used absorbent material will be disposed at an appropriately licensed waste facility.				1. A diesel spill kit was located next to the diesel tank. However the kit was not adequately provisioned. There was insufficient spill control and clean-up materials to be effective in the case of a fuel spill.	The spill kit provided for the diesel fuel storage area was not properly provisioned.	Non Compliance	1. Replenish the spill kit at the Diesel storage area. 2. Prepare and implement a weekly environmental compliance inspection checklist that covers spill kit inspection.
Appendix B Visual		As part of the construction of the recycling facility, the following management measures were implemented to minimise potential visual impacts to the surrounding area: <ul style="list-style-type: none"> <li>Casuarina sp. were planted along the northern boundary and the northern section of the western boundary of the site to mitigate visual impacts from viewpoints to the north, north-east and west; and</li> </ul>					Not audible, this was an action taken during the initial establishment of the site as a recycling facility.	Not Triggered	
		<ul style="list-style-type: none"> <li>rubbish from around the site boundaries was removed.</li> </ul>				1. During the site inspection the Auditor did not observe significant litter in or near the facility.	Litter is collected and removed from the site.	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<ul style="list-style-type: none"> <li>Litter is removed from the site on a regular basis and a number of litter control measures are listed within the EMP (EIS Appendix D).</li> </ul>				1. During the site inspection the Auditor did not observe significant litter in or near the facility.	Litter is collected and removed from the site.	Compliance	
		<ul style="list-style-type: none"> <li>Irrigation pipes have been installed and screening vegetation will be watered if required to maintain healthy growth.</li> </ul>		1. Mayfield West Recycling Facility Landscape Plan and planting schedule, prepared by Terras Landscape Architects.			A landscape plan has been prepared and implemented at the site. The Auditor notes that the irrigation of plants should not use mains water during time of drought.	Compliance	
		<ul style="list-style-type: none"> <li>Screening vegetation will be visually inspected and additional trees will be planted to ensure effective screening if required.</li> </ul>		1. Mayfield West Recycling Facility Landscape Plan and planting schedule, prepared by Terras Landscape Architects.			A landscape plan has been prepared and implemented at the site. The Auditor notes that the irrigation of plants should not use mains water during time of drought.	Compliance	



**Table A2 – Environment Protection Licence 20771**

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Administrative Conditions									
A1	What the Licence Authorises	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.					Administrative Condition Only	Noted	
A2	Premises	Benedict Recycling Mayfield West 1a McIntosh Road					Administrative Condition Only	Noted	
A3	Information Supplied to the EPA	Licence Application					Administrative Condition Only	Noted	
Discharges to Air and Water and Applications to Land									
P1.1	Location of monitoring / discharge points	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.					Administrative Condition Only	Noted	
P1.2		EPA Identification No 1: Final Sediment Basin in North- Western Corner of the site: Point 1 Final Sedimentation Basin (North-western corner of the site)					Administrative Condition Only	Noted	
P1.3		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 Point 2 Noise Monitoring R1 Kerr Street Point 3 Noise Monitoring R2 - Woodstock Street - north/east Point 4 Noise Monitoring R3 - Woodstock Street - north/west Point 5 Noise Monitoring R4 - Simpson Court Point 6 Noise Monitoring R5 - Shelly Close Point 7 Noise Monitoring R6 - Gronngal Street - East Point 8 Noise Monitoring R7 - Gronngal Street Point 9 Noise Monitoring R8 - Gronngal Street Point 10 Noise Monitoring R9 - Gregson Avenue Point 11 Noise Monitoring R10 - Gregson Avenue Point 12 Noise Monitoring R11 - 80 Gregson Avenue Point 13 Noise Monitoring R12 - Terry Street Point 14 Noise Monitoring R13 - Oleria Crescent Point 15 Noise Monitoring R14 - Mayfield West Primary School Point 16 Noise Monitoring R15 - Church of Christ Point 17 Noise Monitoring R16 - Scout Hall Point 16 Meteorological Station					Administrative Condition Only	Noted	
Limit Conditions									



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
L1.1	Pollution of Waters	Compliance with Section 120 of the POEO		1. Incident Register			No water pollution events occurred during the Audit Period.	Compliance	
L2.1 - 2.3	Concentration Limits	For each monitoring/discharge point or utilisation area specified in the table/s 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.						Compliance	
L2.4		Water and/or Land Concentration Limits: Oil and Grease: 10 mg/L pH: 6.5 - 8.5 TSS: 50 mg/L		1. Incident Register			No discharges from the site have occurred during the Audit Period.	Not Triggered	
L3.1	Waste	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p>		1. Weighbridge Data Base Records			No unapproved wastes have been accepted at the facility for processing.	Compliance	
L3.2		The premises may accept up to 315,000 tonnes of general solid waste (non-putrescible) per annum		<p>1. Annual Review Mayfield West Recycling Facility (SSD 7698) 13 March 2018 - 31 December 2018.</p> <p>2. Waste Tracker Weekly Reports (report from computerised waste receipt records system) from September 2018 to October 2019.</p> <p>3. Waste Management Plan Benedict Recycling Mayfield West Dated May 2018 (appendix to the OEMP).</p>	1. Interview (A. Campbell, Environmental Compliance Officer) - all wastes delivered to the site are weighed on entering the site and leaving the site.	1. Site Inspection 31 October 2019 - all trucks entering and leaving the facility during the site inspection accessed the site via the weighbridge and were weighed in entry and prior to exiting the site. The weighbridge operator was observed recording the weights of all loads on the (computerised) waste processing database system).	<p>The Annual Review stated that over the period from 18/03/2018 and 31/12/2018, 85334 tonnes of General Solid Wastes were received and processed at the Benedict Recycling Facility.</p> <p>A review of waste records (Waste Tracker Reports) for the 2019 Calendar year showed that year to date approximately 123,873 tonnes of general solid wastes have been received and processed at the facility.</p> <p>Waste receipt, inspection and record keeping procedures are detailed in Section 5 of the Waste Management Plan. Observations made during the audit verified that the general procedures detailed in the WMP were being implemented at the time of the audit.</p>	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
L3.3		Notwithstanding any limit specified in the above table, the licensee shall not exceed the authorised amount specified in this licence. Where the authorised amount is less than the total of all wastes listed above, the authorised amount will take precedent.						Noted	
L3.4		The authorised amount of waste permitted on the premises cannot exceed 53,733 tonnes at any one time.		<p>1. Annual Review Mayfield West Recycling Facility (SSD 7698) 13 March 2018 - 31 December 2018.</p> <p>2. Waste Tracker Weekly Reports (report from computerised waste receival records system) from September 2018 to October 2019.</p>	<p>1. Interview (A. Campbell, Environmental Compliance Officer)</p> <ul style="list-style-type: none"> <li>- The quantity of wastes stored at the site is determined by a weekly visual stocktake.</li> <li>- The soils currently stockpiled on the site area typically from construction and demolition sites and infrastructure projects</li> <li>- Area D. Mixed Waste (i) no contaminated soils. The soils stored in Area D are in the potentially contaminating waste area, as depicted in the consent in Appendix A. These soils have been classified as General Solid Waste and are checked against our licence limits, to ensure they meet the limits before being brought to our site.</li> <li>- The small tyre stockpile comes from mixed waste loads e.g. skip bins. Tyres are picked out of loads and kept together to be picked up by Tyrecycle for off-site disposal.</li> </ul>	<p>1. The following stockpiles of wastes were observed:</p> <ul style="list-style-type: none"> <li>- unsorted wastes on the waste receival / processing floor (Photo #2)</li> <li>- timber (mainly pallets) north-western end of the site (near the final sedimentation basin) (photo #3)</li> <li>- uncrushed concrete (multiple stockpiles) in the north-western corner of the site (photo #3)</li> <li>- soil / mixed waste (multiple stockpiles) in Area D (photo #4)</li> <li>- timber (trees) in the southern section of Area D (photo #5)</li> <li>- shredded timber in Area D</li> <li>- mulch (southern end of Area D)</li> <li>- plasterboard / cement sheeting immediately to the east of the waste receival shed (photo #6)</li> <li>- tyres (small stockpile) to the east of the waste receival shed (Photo #7)</li> </ul>	<p>The Annual Review stated that over the period from 18/03/2018 and 31/12/2018, the maximum quantity of wastes stored on the site at any time was reported to be 16,075 tonnes .</p> <p>A review of waste records (Waste Tracker Reports) for the 2019 Calendar year showed that year to date the maximum quantity of wastes stored on the site at any time was reported to be less than 16,000 tonnes.</p> <p>The auditor estimated the area of the site where wastes are currently stored at the time of the site inspection was as circa 10,000 m<sup>2</sup>. This estimation assumed an average stockpile height of 1 m (stockpile heights ranged between 1 and 3 metres), over the entire potential storage area of 10,000 m<sup>3</sup> (excluding the sorting shed). At an average density for mixed waste of 225 tonnes /m<sup>3</sup> would equate to a total weight of wastes of approximately 22,500 tonnes.</p>	Compliance	
L3.5		All waste stockpiles occurring as part of the operation at the premises must be no greater than 7.0 metres in height.			<p>1. Interview (H. Nowlan Site Manager)) -Three height stockpile markers have been installed around the site to provide a visual reference to site personnel.</p>	<p>1. Three stockpile height reference markers were sighted by the Auditor (Photo #8). All stockpiles on the site, at the time of the audit were below the 7.0 metre height limit.</p>	<p>At the time of the audit all stockpiles were well below the 7.0 metre height limit.</p>	Compliance	
L3.6		All waste activities, including unloading, loading, processing and stockpiling of wastes, is only permitted within the area as identified as the Development Area in the State Significant Development 7698 - Appendix A Plans - Development Layout Plan.		<p>1. Waste Management Plan Benedict Recycling Mayfield West Dated May 2018 (appendix to the OEMP).</p>		<p>1. The waste processing and storage activities are being undertaken in general accordance with the WMP.</p>	<p>The waste activities, including unloading, loading, processing and stockpiling of wastes within the area identified as the Development Area in the State Significant Development 7698 - Appendix A Plans - Development Layout Plan.</p>	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
L4.1	Noise Limits	Noise limits ((Laeq(15min): Location    Day    Evening    Night    Night (Amax) R1            48            40            40            51 R2            49            41            41            52 R3            47            39            39            51 R4            47            39            39            50 R5            50            42            42            53 R6            48            41            41            51 R7            48            41            41            52 R8            48            40            40            52 R9            49            42            42            52 R10          49            41            41            51 R11          49            42            42            52 R12          42            41            41            48 R13          40            36            36            47 R14          Internal 35 dB(A) - Noisiest 1 hour period (when in use) R15          Internal 40 dB(A) - Noisiest 1 hour period (when in use) R16          Internal 55 dB(A) - Noisiest 1 hour period (when in use)		1. Benedict Recycling - Mayfield EPL quarterly attended noise monitoring Quarter 1 2019. 1. Benedict Recycling - Mayfield EPL quarterly attended noise monitoring Quarter 2 2019. 1. Benedict Recycling - Mayfield EPL quarterly attended noise monitoring Quarter 3 2019.			Points 5, 9 and 12 were monitored in accordance with Conditions L4.2, L4.3, L4.4, L4.5 and M7.1 (below).  During each of the monitoring events reviewed, noise emissions from the Benedict Recycling Facility were reported as being "Inaudible".	Compliance	
L4.2		For the purpose of condition L4.1: - Day is defined as the period from 7 a.m. to 6 p.m. Monday to Saturday and 8 a.m. to 6 p.m. Sunday and Public Holidays. - Evening is defined as the period 6 p.m. to 10 p.m. - Night is defined from 10 p.m. to 7 a.m. Monday to Saturday and 10 p.m. to 8 a.m. Sunday and Public Holidays.						Noted	
L4.3		The noise limits set out in condition L4.1 apply under all meteorological conditions except for the following: a) Wind speeds greater than 3 metres/second at 10 metres above ground level; or 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.						Noted	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
L4.4		To determine compliance: a) the Leq(15 minute) noise limits in condition L4.1, the noise measurement equipment must be located: - approximately on the property, 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 3 metres, 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 Nature Reserve. b) with any LAmax in condition L4.1, the noise measurement equipment must be located within 1 metre of a dwelling façade. c) with the noise limits in condition L4.1, 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 L4.4(a) or L4.4(b).						<b>Noted</b>	
L4.5		A non-compliance of conditions L4.1 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 L4.4(a) and L4.4(b); and/or - at a point other than the most affected point at a location.						<b>Noted</b>	
L4.6		The crusher and shredder are only permitted to be operated in the segregated heavy waste processing and stockpiling area, no further south than 130 m from the northern site boundary in accordance with the State Significant Development 7698 - Appendix A Plans - Location of Crusher, Shredder and Screens.					1. The shredder operations were occurring within 130 m from the northern site boundary.	<b>Compliance</b>	
L4.7		The mobile screens in the segregated heavy waste processing area and stockpiling area must not be operated simultaneously with the crusher or shredder.			1. Interview (A. Campbell, Environmental Compliance Officer) - No crushing has been undertaken at the site during the audit period.		No crushing has been undertaken at the facility during the Audit Period.	<b>Not Triggered</b>	
L5.1	Hours of Operation	Hours of Operation Table		1. Complaints Register. 2. Driver Induction. 3. Drivers Code of Conduct			No complaints regarding out of hours operation have been received. The Driver Code of Conduct specifies the operating hours of the facility.	<b>Compliance</b>	
L5.2		Works outside the hours identified in condition L5.1 may be undertaken in the following circumstances: i. the works are inaudible at the nearest sensitive receivers; or ii. for the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; or iii. where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.		1. Complaints Register.	1. Interview (A. Campbell, Environmental Compliance Officer) - There have been out of hours operations during the Audit Period		No evidence of out of hours operation were identified during the Audit.	<b>Not Triggered</b>	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
L5.3		Waste receipt is permitted on a 24-hour per day basis on limited occasions to facilitate major infrastructure projects. Limited occasions is defined as: i) no greater than six times per year; and ii) only for a period of less than two weeks in length for each occasion.		1. Complaints Register.	1. Interview (A. Campbell, Environmental Compliance Officer) - There have been out of hours operations during the Audit Period		No evidence of out of hours operation were identified during the Audit.	<b>Not Triggered</b>	
L5.4		The EPA must be notified no later than 48 hours prior to each of the 24-hour waste receipt periods referred to in condition L5.3 along with a description of the major infrastructure projects which necessitate the 24-hour operations.		1. Complaints Register.	1. Interview (A. Campbell, Environmental Compliance Officer) - There have been out of hours operations during the Audit Period		No evidence of out of hours operation were identified during the Audit.	<b>Not Triggered</b>	
<b>Operating Conditions</b>									
O1.1	Activities	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.				1. At the time of the audit the activities being undertaken were being undertaken in general accordance with the OEMP.	At the time of the audit the activities being undertaken were being undertaken in general accordance with the OEMP.	<b>Compliance</b>	
O2.1	Maintenance of Plant and Equipment	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and				1. At the time of the audit the plant and equipment being used were operational and being used in general accordance with the OEMP.	At the time of the audit the activities being undertaken were being undertaken in general accordance with the OEMP.	<b>Compliance</b>	
		b) must be operated in a proper and efficient manner.				1. At the time of the audit the plant and equipment being used were operational and being used in general accordance with the OEMP.	At the time of the audit the activities being undertaken were being undertaken in general accordance with the OEMP.	<b>Compliance</b>	
O3.1	Dust	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.				1. No significant dust generation was observed during the audit, however the following observations were made: a) there were no water sprays used on the screening works a) while a water truck was effective in keeping the internal roads wet, the internal road ways were heavily tracked with mud and dirt.	Further dust mitigation actions are required to ensure that dust generation can be controlled on the site. For example: a) ensuring that all stockpiles and screening are provided with appropriate water sprays. B) that internal roads are cleaned (swept) to reduce soil / mud loads.	<b>Non Compliance</b>	1. Review dust management actions including stockpile water sprays and sweeping of internal roads.

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
O3.2		Trucks entering and leaving the premises that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and unloading.		1. Drivers Induction Form (Form 254.6)		All trucks accessing the site at the time of the audit were covered.	All trucks accessing the site at the time of the audit were covered.	Compliance	
O3.3		No material including sediment is permitted to be tracked from the premises.				1. A wheel wash has been installed and was operating at the time of the inspection. 2. No visible dust was observed from trucks entering or leaving the site.	A wheel wash has been installed and was operating at the time of the inspection.	Compliance	
O4.1	Emergency Response	A copy of the current version of the Pollution Incident Response Management Plan (PIRMP) for the premises must be kept at the premises.  A PRIMP is required under Part 5.7A of the Protection of the Environment Operations Act 1997 and its regulations. The PIRMP must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment.		1. Pollution Incident Response Management Plan, Revision 3 (Uploaded to the Benedict Website).			The PIRMP is available on the Benedict Website.	Compliance	
		The PIRMP must be tested at least annually or following a pollution incident.		1. Annual Return (2019)	1. Correspondence following review of draft report (A Campbell): PIRMP has been reviewed and a desktop scenario created as noted in the EPL Annual Return. Last test date was 5 November 2019 and last update was 25 Feb 2019		The PIRMP has been tested since during the Audit Period.	Compliance	
O5.1	Processes and Management	A litter management program must be implemented, which includes litter patrol to ensure that the local amenity is not degraded.		1. Operational Environmental Management Plan.		1. no significant litter was observed on the site at the time of the Audit.	No routine environmental inspections are undertaken.	Non Compliance	1. Prepare and implement a weekly environmental compliance inspection that covers on-site litter.
O5.2	Bunding	All above ground tanks containing material capable of causing harm to the environment must be stored within a bund or within an alternative spill containment system that achieves the same outcome.				1. The diesel fuel storage tank is self bunded and located within a bund. 2. Oils and greases stored within the maintenance shed are located on bunded pallets.	Bunding is provided for all above ground tanks containing liquids (other than water).	Compliance	



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
O5.3		Bunds must: a) have walls and floors constructed of impervious materials; b) be of sufficient capacity to contain 110% of the volume of the tank (or 110% volume of the largest tank where a group of tanks are installed); c) have floors graded to a collection sump; and d) not have a drain valve incorporated in the bund structure, or be constructed and operated in a manner that achieves the same environmental outcome.				1. The fuel tank is self-bunded and meets the requirements of AS1940. The bund meets the requirement of this Condition except it does not have a sump from which spilt materials can be recovered.	The bund meets the requirements of this Condition except that it does not have a sump from which spilt materials can be recovered.	<b>Non Compliance</b>	1. Upgrade the existing fuel bund to provide at least 30,000 litres capacity and to include a sump for the collection of spilt materials.
O5.4	Surface Water Management	A surface water management system must be operated and maintained at the premises at all times.		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. Audit inspection of the surface water management system.	The Surface Water Characterisation and Mitigation Plan provides details of the surface water management system that is in place at the facility. The Auditor's observations during the audit confirmed that the system meets the design contained in the Plan.	<b>Compliance</b>	
O5.5	Surface Water Management	The surface water management system must be maintained to minimise the infiltration of surface water to groundwater. This includes inspecting the surface water infrastructure monthly for cracking and vegetation breakthrough, removing the vegetation and sealing the surface water infrastructure.		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. Vegetation that has grown through the perimeter drain has damaged the concrete seal and the drain is no longer impervious. Refer to Photo #10.	1. Maintenance of the perimeter drain has not been undertaken (removal of vegetation and re-sealing of the drain).	<b>Non Compliance</b>	1. Undertake a detailed survey of the perimeter drain, identify all areas where vegetation has damaged the drain or the drain has been otherwise compromised. Remove all of the vegetation and reseal the drain.
O5.6		The final sediment basin must be maintained with a minimum capacity to contain the 90th percentile rainfall over any consecutive 5-day period in accordance with Managing Urban Stormwater - Soils and Construction Vol. 2B: Waste landfills.		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018. 2. Letter from Tooker Associates to Benedict titled "Area 1 Initial Tank and Holding Tanks Inspection" dated 22 June 2018. The letter certifies that the surface water management system installed Areas 1 meets the requirements of Condition B25 and B26.		1. Audit inspection of the surface water management system.	The surface water management system has been designed and installed (as certified by the DPIE expert) in accordance with Clause B25 of the Approval.	<b>Compliance</b>	
O5.7		A visible marker must be installed and maintained in the final sediment basin in a position that shows freeboard in the basin that equates to the volume required to contain all rainfall and runoff in the catchment from a 90th percentile rainfall event over any consecutive 5-day period.		1. Mayfield West Recycling Facility Surface Water Characterisation and Mitigation Plan, prepared by EMM Consultants, dated 6 September 2018.		1. The auditor observed the level marker within the main sediment Basin	The required depth marker was in place at the time of the audit.	<b>Compliance</b>	
O6.1	Waste Management	All putrescible waste received at the premises must be: a) stored in an enclosed vessel; and b) disposed of, to a place that can lawfully receive that waste, within 24 hours of receipt.		1. Waste Management Plan. 2. Weighbridge Waste Receipt Records.		1. No putrescible wastes were stored on site at the time of the audit.	The Waste Management Plan specifies that all non-conforming wastes will be rejected.	<b>Compliance</b>	



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
O6.2		Waste collected at the premises that is unable to be recycled, must not be stored at the premises and must be taken to a lawful waste facility at least once a week.		1. Waste Management Plan. 2. Weighbridge Waste Receipt Records.			The OEMP and WMP do not require that residual wastes must not be stored for more than one week. No guidance is provided to employees in regards to waste holding times (in those referred to in Condition O6.2).	Non Compliance	1. Revise the OEMP and WMP to include reference to maximum waste holding times for both approved wastes and non-conforming wastes that may be inadvertently accepted.
O6.3		All co-mingled waste (to include but not limited to metals, shredded wood products, glass and non-recyclable residues) received at the Premises must be unloaded, processed and stockpiled within an enclosed processing shed.		1. Waste Management Plan. 2. Weighbridge Waste Receipt Records.		1. Mixed waste loads were sighted being unloaded and separated within the main waste receipt shed.	The WMP (Section 5) specifies that all residual wastes are to be sent to EPA licenced facilities for disposal.	Compliance	
Monitoring and Reporting Conditions									
M1.1	Monitoring Records	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.		1. Benedict Recycling - Mayfield EPL quarterly attended noise monitoring Quarter 1 2019. 1. Benedict Recycling - Mayfield EPL quarterly attended noise monitoring Quarter 2 2019. 1. Benedict Recycling - Mayfield EPL quarterly attended noise monitoring Quarter 3 2019.			Noise monitoring has been undertaken for Quarter 4, 2008 and Quarters 1, 2 and 3 for 2019. The noise monitoring undertaken reported that the works at the Recycling Facility were "inaudible".	Compliance	
M1.2		All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.		1. Benedict Recycling - Mayfield EPL quarterly attended noise monitoring Quarter 1 2019. 1. Benedict Recycling - Mayfield EPL quarterly attended noise monitoring Quarter 2 2019. 1. Benedict Recycling - Mayfield EPL quarterly attended noise monitoring Quarter 3 2019.			All records assessed by the Auditor were readily available and legible.	Compliance	
M1.3		The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.					No water samples were collected during the Audit Period.	Not Triggered	
M2.1	Requirement to Monitor concentration of pollution discharged.	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:					No water discharges occurred during the Audit Period, therefore no water samples were collected.	Not Triggered	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
M2.2		Water and/ or Land Monitoring Requirements - Table for Point 1: Oil and Grease During any discharge - Grab Sample pH During any discharge - Grab Sample Total Suspended Solids During any discharge - Grab Sample					No water discharges occurred during the Audit Period, therefore no water samples were collected.	<b>Not Triggered</b>	
M3.1	Testing Methods	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.					No water discharges occurred during the Audit Period, therefore no water samples were collected.	<b>Not Triggered</b>	
M4.1	Weather Monitoring	At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.					No water discharges occurred during the Audit Period, therefore no water samples were collected.	<b>Not Triggered</b>	
M5.1	Recording of Pollution Complaints	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.		1. Web Site			A summary complaints register is maintained on the website and a hard copy is maintained at the Weighbridge.	<b>Compliance</b>	
M5.2		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.		1. Complaints Register (held in at the Weighbridge) - refer to Photo #18.			The complaints register kept at the Weighbridge provides all of the details required by this Condition. However, at the time of the audit there are no details on the register regarding the dust complaint received on 9 August 2019.	<b>Non Compliance</b>	1. Ensure that all details of the complaints received are recorded in the Complaints Register.
M5.3		The record of a complaint must be kept for at least 4 years after the complaint was made.					The complaints register has been maintained since September 2018 (the commencement of operations).	<b>Not Triggered</b>	
M5.4		The record must be produced to any authorised officer of the EPA who asks to see them.						<b>Noted</b>	
M6.1	Telephone Complaints Line	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.				1. Entrance sign	The sign at the front gate to the site provides a telephone number for the site.	<b>Compliance</b>	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
M6.2		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.					The sign at the front gate does not promote a "Complaints Telephone" Number.  The website does not reference telephone complaints line for the Mayfield West Recycling Facility.	Non Compliance	1. Add details of the telephone complaints line to the website.
M6.3		The preceding two conditions do not apply until one month after the date of the issue of this licence.						Noted	
M7.1	Noise Monitoring	To assess compliance with the noise limits specified within this licence, the licensee must undertake operator attended noise monitoring at each specified noise monitoring point in accordance with the table below.		1. Benedict Recycling - Mayfield EPL quarterly attended noise monitoring Quarter 1 2019. 1. Benedict Recycling - Mayfield EPL quarterly attended noise monitoring Quarter 2 2019. 1. Benedict Recycling - Mayfield EPL quarterly attended noise monitoring Quarter 3 2019.			Noise monitoring has been undertaken for Quarter 4, 2008 and Quarters 1, 2 and 3 for 2019. The noise monitoring undertaken reported that the works at the Recycling Facility were "inaudible".	Compliance	
Reporting Conditions									
R1.1	Annual Returns	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 Public Register ( <a href="http://www.epa.nsw.gov.au/licencing-and-regulation/public-registers/">www.epa.nsw.gov.au/licencing-and-regulation/public-registers/</a> )			The EPA's Public Register states that the Annual return for May 2018 - May 2019 has been received. The Register notes that the Annual return reported no non-compliances.	Compliance	
R1.2		An Annual Return must be prepared in respect of each reporting period, except as provided below.		EPA Public Register ( <a href="http://www.epa.nsw.gov.au/licencing-and-regulation/public-registers/">www.epa.nsw.gov.au/licencing-and-regulation/public-registers/</a> )			The EPA's Public Register states that the Annual return for 2018 - 2019 has been received	Compliance	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
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.						Noted	
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.						Noted	
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').						Noted	
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.		1. 20180719 Newcastle Annual Return 2018.pdf 2. 201906259 Newcastle Annual Return 2019.pdf			Benedict has retained a copy of the 2018/19 Annual Returns.	Compliance	
R1.7		Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.		1. 20180719 Newcastle Annual Return 2018.pdf 2. 201906259 Newcastle Annual Return 2019.pdf			Benedict has retained a copy of the 2018/19 Annual Returns.	Compliance	
R2.1	Notification of Environmental Harm	Notifications must be made by telephoning the Environment Line service on 131 555.  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.			1. Interview (A. Campbell, Environmental Compliance Officer) - no environmental incidents resulting in environmental harm have occurred during the site during the audit period.		No environmental incidents resulting environmental harm occurred during the Audit Period.	Not Triggered	
R2.2		The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.			1. Interview (A. Campbell, Environmental Compliance Officer) - no environmental incidents resulting in environmental harm have occurred during the site during the audit period.		No environmental incidents resulting environmental harm occurred during the Audit Period.	Not Triggered	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
R3.1	Written Report	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or 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.		EPA Public Register ( <a href="http://www.epa.nsw.gov.au/licencing-and-regulation/public-registers/">www.epa.nsw.gov.au/licencing-and-regulation/public-registers/</a> )			No details of notices from the EPA have been presented to the Auditor (other than the Penalty Notice referenced on the Public Register).	<b>Not Triggered</b>	
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.		EPA Public Register ( <a href="http://www.epa.nsw.gov.au/licencing-and-regulation/public-registers/">www.epa.nsw.gov.au/licencing-and-regulation/public-registers/</a> )			No details of notices from the EPA have been presented to the Auditor (other than the Penalty Notice referenced on the Public Register).	<b>Not Triggered</b>	
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.		EPA Public Register ( <a href="http://www.epa.nsw.gov.au/licencing-and-regulation/public-registers/">www.epa.nsw.gov.au/licencing-and-regulation/public-registers/</a> )			No details of notices from the EPA have been presented to the Auditor (other than the Penalty Notice referenced on the Public Register).	<b>Not Triggered</b>	
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.		EPA Public Register ( <a href="http://www.epa.nsw.gov.au/licencing-and-regulation/public-registers/">www.epa.nsw.gov.au/licencing-and-regulation/public-registers/</a> )			No details of notices from the EPA have been presented to the Auditor (other than the Penalty Notice referenced on the Public Register).	<b>Not Triggered</b>	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
R4.1	Other Reporting Conditions	A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the quarterly monitoring. The assessment must be prepared by a suitably qualified and experienced acoustical consultant and include: a) as assessment of compliance with noise limits for R5,R9 and R12; and b) an outline of any management actions taken within the monitoring period to address any exceedances of the noise limits for R5, R9 and R12.		1. Email to the EPA Waste Operations email from Benedict (A Campbell) titled: "Benedict -Mayfield West - Q3 noise compliance reports", dated 28 October 2019. The email contained a copy of the September 2019 Noise Monitoring Report, dated 25 September 2019. 2. Email to the EPA Waste Operations email from Benedict (A Campbell) titled: "Benedict -Mayfield West - Q2 noise compliance reports", dated 16 July 2019. The email contained a copy of the March 2019 Noise Monitoring Report, dated 9 May 2019. 3. Email to the EPA Waste Operations email from Benedict (A Campbell) titled: "Benedict -Mayfield West - Q1 noise compliance reports", dated 28 October 2019. The email contained a copy of the March 2019 Noise Monitoring Report, dated 20 March 2019. 4. Email to the EPA Waste Operations email from Benedict (A Campbell) titled: "Benedict -Mayfield West - Noise Compliance Reports", dated 30 January 2019. The email contained a copy of the Q3, 20-18 report issued on 26 September 2018 and the Q4 report that was issued on 26 November 2018.			The required noise compliance assessment reports have been provided to the EPA . However, all reports were provided to the EPA after the 30 day period specified in this condition.	Non Compliance	1. Ensure that all noise compliance assessment reports are provided to the EPA within the 30 day time limit.
General Conditions									
G1.1	Copy of Licence to be kept at the premises	A copy of this licence must be kept at the premises to which the licence applies.				1. Weighbridge documents	A copy of the EPL was available at the weighbridge office.	Compliance	
G1.2		The licence must be produced to any authorised officer of the EPA who asks to see it.						Noted	
G1.3		The licence must be available for inspection by any employee or agent of the licensee working at the premises.				1. Weighbridge documents	A copy of the EPL was available at the weighbridge office.	Compliance	
Special Conditions									



Condition Reference	Short Title	Condition	Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
E1.1	Financial Assurance	<p>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 prior to the issue of the licence. The financial assurance must be in favour of the EPA in the amount of three hundred and thousand dollars (\$300,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence.</p> <p>The licensee must provide to the EPA an initial financial assurance in favour of the EPA the amount of one hundred thousand dollars (\$100,000) within one (1) month of the issue of this licence.</p> <p>An additional one hundred thousand dollars (\$100,000) must be provided in favour of the EPA to the EPA within 12 months from the licence issue dates.</p> <p>A final one hundred thousand dollars (\$100,000) must be provided in favour of the EPA to the EPA within 24 months from the licence issue date.</p>	1. Three Bank Guarantee from the Commonwealth Bank each for \$100,000, dated 6 June 2018, 31 January 2018 and 23 May 2016.			The required financial assurances have been provided to the EPA.	Compliance	
E1.2		The licensee must provide to the EPA, along with the original counterpart guarantee, confirmation in writing that the financial institution providing the guarantee is subject to supervision by the Australian Prudential Regulatory Authority (APRA).	1. Three Bank Guarantee from the Commonwealth Bank each for \$100,000, dated 6 June 2018, 31 January 2018 and 23 May 2016.			The required financial assurances have been provided to the EPA.	Compliance	
E1.3		The financial assurance must contain a term that provides that any money claimed can be paid to the EPA or, at the direction of the EPA, to any other person.	1. Three Bank Guarantee from the Commonwealth Bank each for \$100,000, dated 6 June 2018, 31 January 2018 and 23 May 2016.			The required financial assurances have been provided to the EPA.	Compliance	
E1.4		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.	1. Three Bank Guarantee from the Commonwealth Bank each for \$100,000, dated 6 June 2018, 31 January 2018 and 23 May 2016.			The required financial assurances have been provided to the EPA.	Compliance	
E1.5		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.		1. Interview (A. Campbell, Environmental Compliance Officer) - No claims have been made against the Bank Guarantees.		No claims have been made against the Bank Guarantees.	Not Triggered	
E1.6		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.		1. Interview (A. Campbell, Environmental Compliance Officer) - No claims have been made against the Bank Guarantees.		No requests have been made by the NSW EPA to increase the financial assurances provided.	Not Triggered	



Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
E1.7		The licensee must provide to the EPA the original counterpart guarantee within five working days of the issue of: a) the financial assurance required by condition E1.1, and b) the adjusted financial assurance, also required by condition E1.1.		1. Three Bank Guarantee from the Commonwealth Bank each for \$100,000, dated 6 June 2018, 31 January 2018 and 23 May 2016.			No information was available to the Auditor to verify that the required financial assurances has been provided to the EPA.  Assessment: Not Verified.	Compliance	
E1.8		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	
E2.1	Environmental Obligations of Licensee	While the licensee's premises are being used for the purpose to which the licence relates, the licensee must: 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.			1. Interview (A. Campbell, Environmental Compliance Officer) - no environmental incidents including have occurred during the site during the audit period.		No environmental incidents including spills occurred during the Audit Period.	Not Triggered	
		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.						Compliance	
		c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.		Website			All monitoring data has been uploaded to the Benedict Website.	Compliance	
E2.2		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: 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.			1. Interview (A. Campbell, Environmental Compliance Officer) - no earthquakes, storms, fires or floods impacted the site during the audit period.		No earthquakes, storms, fires or floods impacted the site during the audit period.	Not Triggered	

Condition Reference	Short Title	Condition		Documents Provided	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
E2.3		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: a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; and b) rehabilitate the site so that its contamination status is no worse than that described in the Site Audit Report - Former EMD Facility Mayfield West, prepared for Delta EMD, prepared by ENVIRON Australia Pty Ltd, November 2009, Audit Number: GN 397.						<b>Not Triggered</b>	
E3.1	EPA may claim on financial assurance	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 or clean up notice issued under Section 91 of the POEO Act.						<b>Not Triggered</b>	



# Audit Photos

Appendix B



*Photo # 1 Third party waste bin storage*



*Photo # 2 - Waste stockpile in receival shed*





*Photo # 3 - Timber (pallets) and concrete stockpiles*



*Photo # 6 Timber (trees) stockpile*



*Photo # 5 Plasterboard stockpile*





*Photo # 8 Waste Tyre Stockpile*



*Photo # 7 - Stockpile Height Marker Pole*







*Photo # 10 – Wheel W*



*Photo # 9 - Perimeter Drain*





*Photo # 12 - Wastewater Sump, pumps and treatment system*



*Photo # 11 - Diesel Storage Tank Installation*





*Photo # 14 - Directional Signage*



*Photo # 13 - Pedestrian Path Markings*





*Photo # 16 – Site Signage (including speed limit)*



*Photo # 15 – Tree Waste Stockpile*





*Photo # 18 - Timber Wastes and Mulch Stockpiles*

[illegible]

Photo # 17 - Complaints Register

# DPIE Auditor Approval

Appendix C