



ENVIRONMENT & NATURAL RESOURCE SOLUTIONS

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Site Reference: West Nowra
Recycling & Waste
Facility

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REPORT: WEST NOWRA RECYCLING & WASTE FACILITY STAGES 1-3 RESULTS OF 5-YEAR ENVIRONMENTAL AUDIT

1. INTRODUCTION

Environment & Natural Resource Solutions (ENRS Pty Ltd) was commissioned by Shoalhaven City Council (the client) for the provision of an environmental audit, by a suitably qualified professional, in accordance with Condition 21 of Development Application (DA) No. 90/3061 for the West Nowra Recycling and Waste Facility Stages 1 to 3.

An environmental audit has been independently conducted by PMR Strategies Pty Ltd (t/a The Hydro-Geologie Institute), which was led by Mr Aaron Hagenbach as the Principal Auditor, and the report is enclosed in Attachment 1.

An outline of the audit process and the results of the environmental audit are provided below, along with a summary of the opportunities for improvement and recommendations based on the audit findings.

2. AUDIT PROCESS

The environmental audit process was carried out generally in the following sequence, and recognising the contemporary DPE Audit Guideline(s), where relevant¹:

- Initiation and Desktop Review, Preliminary Planning Activities and Provision of Initial Information Request.
- Review of Information and Preparation of a draft Checklist/Compliance Register against the Conditions of DA No. 90/3061 (including amendments) as well as Environment Protection Licence (EPL) No. 5877.
- Consultation with the NSW Environment Protection Authority (EPA) as a key agency with a role in regulating the existing development.
- Site Inspection/Interviews with Key Personnel on Thursday, 27 June 2019.
- Review of Additional Information provided after the Site Inspection/Interviews and Update of Checklist/Compliance Register.
- Preparation of the draft Audit Report.

¹ Whilst both the NSW Government (2015) and DPE (2018) Guidelines post-date the requirements of Condition 21 of DA No. 90/3061, and were published during the 5-year audit scope period, they have been used as guidance.

- Incorporation of final comments/clarifications on the draft Audit Report and subsequent issue of Final Audit Report.

3. RESULTS OF THE ENVIRONMENTAL AUDIT

At the time of the site inspection, landfilling activities at the premises were in operation and contained within the approved extents of the development footprint.

The environmental audit recognises that since the original DA No. 90/3061 was endorsed, and amended, more than 20 years ago, the relevant environmental management plans, monitoring and reporting practices and standards at the West Nowra Recycling and Waste Facility – Stages 1 to 3 have significantly evolved and been streamlined to reflect the introduction of, and changes to, NSW Government policy, legislation, departments, guidelines and licence conditions, as well as improved landfilling operations, implementation of best practices, and innovative and alternative landfilling/recycling practices.

Based on the review of available documented information for the 5-year audit scope period (i.e. 24 May 2014 to 24 May 2019), site inspection and interviews, it was evident that the existing environmental management (and response) practices implemented as part of the currently approved landfill operations at West Nowra Recycling and Waste Facility Stage 1 to 3 are being carried out in a competent manner and are generally compliant, with some administrative non-compliance and/or low risk level non-compliance resulting as a consequence of the evolution and streamlining of contemporary requirements which are not currently reflected in DA No. 90/3061.

Detailed review of the requirements of the key approval documentation identified several noteworthy aspects to be considered to maintain acceptable standards at the West Nowra Recycling and Waste Facility Stages 1 to 3 to ensure satisfactory compliance. A summary of these aspects, and corresponding recommendations are discussed in **Section 3.1**.

Importantly, it is also noted that the SCC has introduced and is implementing industry best practices for landfilling and resource recovery at the premises and therefore the Stage 1 to 3 landfill life expectancy has been extended by several years. With the potential staged integration with the neighbouring West Nowra Resource Recovery Facility (SSD 15_7015) and the proposed landfill extension at Stage 4 (SSD 15_7187) it could further extend an additional 20 years (combined)². It is also understood that the NSW Department of Planning and Environment has indicated a preference for the West Nowra Recycling and Waste Facility to operate under a single, modern planning approval and to consider surrendering all existing planning approvals for the facility (i.e. DA No. 90/3061 [as amended]).

Given the relative number of “not verified” compliance status conditions identified during the environmental audit, and recognising that a modification of DA No. 90/3061 [as amended] is currently the subject of assessment by SCC, it is recommended that a response to this environmental audit be prepared in advance of considering the option to surrender all existing development consents (particularly if amendments are made by SCC in accordance with Condition 5 of DA No. 90/3061).

² The Waste Services Unit SSC has separately sought (Application DS19/1237 received by SCC 3 June 2019) to modify (by Section 96 Amendment) Condition 5 of DA No. 90/3061 to increase the approved use period from 29 years to 49 years (i.e. to 24 May 2040).

3.1. OPPORTUNITIES FOR IMPROVEMENT AND RECOMMENDATIONS

As a result of the environmental audit, a number of opportunities for improvement and recommendations have been provided and are summarised as follows:

- **Conditions of DA No. 90/3061** – Review as part of the current Extension Modification and where necessary revise to reflect:
 - *Environmental Guidelines: Solid Waste Landfills* (2016);
 - other findings of this Environmental Audit recognising the evolution and streamlining of management practices and standards.
- **Landfill Environmental Management Plan** – Review and where necessary revise to reflect:
 - *Environmental Guidelines: Solid Waste Landfills* (2016);
 - *Managing Urban Stormwater: Soils and Construction Volume 2B Waste Landfills* (2008a);
 - *Managing Urban Stormwater: Soils and Construction Volume 2C Unsealed Roads* (2008b); and
 - complaint response and notification procedures required by EPL No. 5877 Conditions M4.2 and M5.2.
- **Landscape Management Plan** – Review and where necessary revise to reflect:
 - requirements of the approved revegetation plan (for the Sandy Creek buffer);
 - requirements of the approved rehabilitation and revegetation plan (for landfill areas); and
 - recognise the habitat corridors under the *Shoalhaven Local Environmental Plan 2014*.
- **Groundwater Monitoring Plan and Ongoing Investigations** – Review and where necessary revise to reflect:
 - recent EPA requests; and
 - *Environmental Guidelines: Solid Waste Landfills* (2016).
- **Conditions of EPL No. 5877** – Vary to reflect the relevant changes to the groundwater monitoring plan and outcomes of ongoing investigations and detailed recommendations included in the Annual Environmental Monitoring Results.
- **Annual Returns** – Include comparisons of water quality datasets against limit conditions prescribed in EPL No. 5877.
- **Annual Report** – Carry forward detailed recommendations included in the Annual Environmental Monitoring Results reports with SCC accountabilities and timeframes for implementation, and review, and if necessary, amend future reporting of activities for application of leachate to the licenced utilisation (irrigation) area.
- **Annual Environmental Monitoring Results reports** – Reflect any new information published in:
 - the revised *Australian and New Zealand Guidelines for Fresh & Marine Water Quality* (2018); and
 - relevant Approved Methods Publications.
- **Landfill Surface Gas Emission Monitoring reports** – Reflect testing and reporting requirements of:
 - Benchmark Technique Number 18 of the *Environmental Guidelines: Solid Waste Landfills* (1996) or methods otherwise agreed with the EPA; and
 - relevant Approved Methods Publications.

- **Pollution Incident Response Management Plan** – Update the Site Emergency Procedure Manual to reflect Condition R4.1 (fire reporting) in EPL No. 5877.
- **Environmental Audits** – Respond, review and where necessary revise the frequency to reflect:
 - *Independent Audit - Post Approval Requirements* (DPE, 2018).

Please refer to the enclosed environmental audit for the complete list of recommendations.

4. CONCLUDING REMARKS

An environmental audit has been conducted in accordance with Condition 21 of DA No. 90/3061 for the West Nowra Recycling and Waste Facility Stages 1 to 3 for the period 24 May 2014 to 24 May 2019.

Whilst a number of pre-commencement / building application and building approval requirements which pre-date the scope of this environmental audit were not triggered or considered any further in the environmental audit, it was recognised that the environmental management plans, monitoring and reporting practices currently in place at the West Nowra Recycling and Waste Facility Stages 1 to 3 have evolved and been streamlined to meet, in most cases, contemporary requirements.

Based on the audit findings, it is however recommended that a number of the management plans, monitoring programs and procedures be reviewed, and if necessary, revised to ensure compliance with the specific requirements of DA No. 90/3061 (as amended), in particular to reflect the requirements of the EPA's *Environmental Guidelines: Solid Waste Landfills* (2016).

In conclusion, the existing environmental management framework, roles and responsibilities appear to provide for effective compliance, albeit with some improvements to be made. Landfilling activities were in operation at the time of the site inspection and contained within the approved extents of the development footprint, and monitoring and control measures (including review and response protocols) considered to be sound.

Should the reader have any queries regarding the results of the environmental audit, please do not hesitate to contact the author for further information or assistance.

Yours sincerely



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**Attachment 1: Environmental Audit
West Nowra Recycling and Waste Facility
Stages 1 to 3
[The Hydro-Geologie Institute, 25 July 2019]**