



ENVIRONMENT PROTECTION AUTHORITY

Our reference: DOC12/49733

Mr Chris Ritchie
Manager - Industry
Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

EMAIL & STANDARD POST

Dear Mr Ritchie

Re: St Peters Materials Recycling Facility, St Peters (MP 11_0086) Exhibition of Environmental Assessment

I refer to your correspondence received on 24 October 2012 by the Environment Protection Authority ("EPA") requesting comments on the Concrete Recyclers (Group) Pty Ltd proposal to construct and operate a Materials Recycling Facility at 2 Albert Street St. Peters (MP11_0086).

I also refer to the Nexus Environmental Planning Pty Ltd "*Environmental Assessment Sandstone Recycling Facility No. 2 Albert Street St Peters*" dated 24 September 2012 and attached with your correspondence (the "Environmental Assessment").

The EPA has reviewed the Environmental Assessment and based on the information in this, provides comments at Attachment A, recommended Conditions of Approval at Attachment B and select Draft Conditions of Licence at Attachment C.

EPA advises that should the project approval be granted, the Proponent will need to apply for an environment protection licence pursuant to Schedule 1 of the *Protection of the Environment Operations Act 1997* ("POEO Act"). A separate application would need to be made to the EPA to obtain this licence.

If you have any further queries regarding this matter, please contact Damien Rose on (02) 9995 5586.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'J Ingham', followed by the date '29/11/12'.

JACQUELINE INGHAM
Unit Head Waste Operations
Environment Protection Authority

ATTACHMENT A – EPA COMMENTS

Air Quality Assessment

As specified in the adequacy review conducted by EPA in January, 2012 the air quality impact assessment conducted for the proposed St Peters Materials Recycling facility is technically sufficient and theoretically indicates that impacts are unlikely provided operations are well managed.

However, there are three pragmatic factors to consider:

1. The proposed facility and dust generating activities are only fifteen metres from the nearest receptor located directly northeast of the facility
2. Wind roses indicate southerly winds prevail for a significant proportion of the time and particularly in summer, i.e. travelling from the facility to the nearest receptors; and
3. There is an existing history of complaints about dust from the landfill adjacent to the proposed facility.

There is a reasonable risk of dust impacts at receptors and in particular amenity issues if operations are not stringently controlled.

The EPA recommends more proactive and reactive dust management strategies including details as to how dust complaints will be responded to and how meteorological conditions will be considered when planning site activities to minimise the risk of impacts. These issues will need to be addressed as part of the dust emissions management plan and also under the recommended conditions of approval.

The Proponent should ensure that the dust emissions management plan detailed in section 7.3 of the EA includes, without being limited to:

- The Premises should be designed to meet the EPL requirement to minimise or prevent the emission of dust from the premises
- Details of the locations and application of an effective watering system
- Details of dust mitigation measures to be implemented during the site preparation phase
- Information as to how the external mound surfaces will be vegetated, with this maintained at all times
- Information as to how the internal mound surfaces will be stabilised when not being worked and vegetated at the final stage
- Methods of dust mitigation to be implemented outside of operating hours.

In addition to the standard dust licence conditions, the EPA recommends:

- The installation of a basic meteorological station. On site wind speed and direction data from this station can be used to inform real time dust management practices including avoidance during adverse conditions and/or additional watering;
- A requirement to audit dust management practices within the first 6-12 months of activities commencing at the Premises and benchmarking against best practice; and
- The Implementation of a formalised complaints management system to ensure that the proponent responds in a timely and appropriate manner when onsite activities are potentially affecting adjacent receptors.

Noise

The EPA has reviewed the EA and notes that the following information previously requested has not been included, namely:

- Operational and construction noise impacts to Sydney Park have not been assessed. EPA considers, however, that operational and construction noise impacts at Sydney Park are likely to meet the applicable passive recreation area noise criteria;

- A table of assessment background levels (ABLs) for day/evening/night periods has not been presented; and
- Keys or legends on Figures 2-3 and 2-4 of the EA have not been provided.

However, the EPA has determined that there is sufficient information provided to provide recommended conditions of approval.

Stormwater management

The EPA is generally satisfied with the design of the site stormwater management system, however the following issues should be considered:

- It is recommended that the external surfaces of the perimeter mounds shall be stabilised by vegetation during the life of the project to minimise the generation of dust and turbid stormwater runoff;
- It is recommended that the internal surfaces of the perimeter mounds be similarly stabilised once excavation works on these is finished;
- It is currently proposed that the internal surfaces, excluding the site accessway, drain to two internal basins that will then discharge through the perimeter mounds, to spillways that flow down the external surface of the mounds. The EPA is concerned that a Humeceptor would not reliably achieve compliant discharge parameters in heavy rain events. The EPA recommends that the internal basins could provide a better solution for the settlement and/or flocculation of turbid runoff. The basin discharge outlets should have a valve/riser installed to facilitate the controlled discharge of compliant stormwater. The EPA will include a condition in the EPL to require a discharge monitoring point at each basin with basic water quality parameters including a TSS of 50mg/L prior to discharge (Note that the EPA will consider an appropriate methodology for determining comparable NTU field measurements);
- It is currently proposed that the two spillways from the stormwater detention basins discharge down the vegetated slope to increase sediment removal. The EPA recommends that these embankments shall be sufficiently stabilised to mitigate erosion created by this discharge; and
- No runoff water quality treatment is detailed for the site accessway. The EPA recommends that the accessway be suitably constructed to ensure runoff discharging from this area will achieve appropriate water quality parameters.

Waste excavation and receipt

The proposal is designed to process and export up to 20kT/a of excavated and imported waste material at the Premises in the initial phase and then 150kT/a once final levels have been achieved.

To ensure that the EPA can verify the appropriate handling of waste material at the facility and ensure compliance with section 88 of the *Protection of the Environment Operations Act, 1997*, the EPA will include in an EPL a condition requiring that a suitably qualified surveyor produce initial and annual surveys of the site consistent with the staging in the project application.

The EPA recommends that processes be developed to identify and lawfully remove unapproved waste from the imported and in-situ material.

The EPA requests further detail about the source and characteristics of material, including sand, to be imported to the Premises. The EPA will require this detail to determine any environmental impacts associated with the material (eg. runoff etc.) and to determine the waste categories that will be allowed to be received at the Premises.

To ensure that adequate records are kept of waste being imported and exported from the Premises, the EPA recommends that a weighbridge be installed.

Operating hours:

Table 6.8 of EA identifies initial site preparation activities, including construction of the accessway and the adjoining operation of the crusher, for which the Noise Goals have relied upon the background + 10dBA construction criteria provided in the *NSW Interim Construction Noise Guideline (ICNG)*. It is appropriate therefore that these activities be conducted during those operating hours specified in the ICNG:

- Monday to Friday: 7am to 6pm
- Saturday: 8am to 1pm
- No work on Sundays or Public Holidays

Once the onsite activities are sufficiently screened, the operating hours could revert to the proposed "Normal Operation" hours of Table 6.8:

- Monday to Friday 6:00am to 6:00pm
- Saturday 7:00am to 4:00pm

The EPA requests the proponent clarify at which point during the development of the operations these "Normal Operation" hours will come into effect.

Landfill Gas Accumulation

The EPA Adequacy Review of the proposal (6. *Construction and installation of Infrastructure*) requested information clarifying the potential for landfill gas to migrate to the premises and to accumulate under buildings. This information has not been included in the Exhibited Environmental Assessment.

Of particular note the EPA recommends that the construction of the onsite facilities be designed to address the potential impact of landfill gas accumulation.

ATTACHMENT B - EPA KEY RECOMMENDED CONDITIONS OF APPROVAL

The EPA has included the following conditions of approval for consideration. Please note that the condition identifiers have been included for cross-reference purposes.

Noise and Meteorological Conditions

- L6.1** Noise generated at the premises must not exceed the noise limits in the table below. The locations referred to in the table below are indicated by Figure 3-1 of '2 Albert Street, St Peters Materials Recycling Facility – Noise Impact Assessment' (NIA) prepared by Wilkinson Murray dated 2 April 2012 (Report Number 09355 Version D).

Location	NOISE LIMITS dB(A)		
	Daytime	Early Morning Shoulder	Early Morning Shoulder
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)
A	47	47	60
B	52	46	54
C	44	43	55
Sydney Park	55	55	N/A

- L6.2** For the purpose of condition L6.1;

- Daytime is defined as the period from 7am to 6pm Monday to Friday, and 7am to 4pm Saturday.
- Early morning shoulder is defined as the period from 6am to 7am Monday to Friday.

- L6.3** The noise limits set out in condition L6.1 apply under all meteorological conditions except for the following:

- a) Wind speeds greater than 3 metres/second at 10 metres above ground level.
- b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or
- c) Stability category G temperature inversion conditions.

- L6.4** For the purposes of condition L6.3:

- a) Data recorded by the Bureau of Meteorology station at Sydney Airport must be used to determine meteorological conditions; and
- b) Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part E4 of Appendix E to the NSW Industrial Noise Policy.

- L6.5** To determine compliance:

- a) with the $L_{eq(15 \text{ minute})}$ noise limits in condition L6.1, the noise measurement equipment must be located:
- approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or
 - within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable; and
 - within approximately 50 metres of the boundary of a National Park or a Nature Reserve.
- b) with the $L_{A1(1 \text{ minute})}$ noise limits in condition L6.1, the noise measurement equipment must be located within 1 metre of a dwelling façade.
- c) with the noise limits in condition L6.1, 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 L6.5(a) or L6.5(b).

L6.6 A non-compliance of condition L6.1 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 L6.5(a) and L6.5(b); and/or
- at a point other than the most affected point at a location.

L6.7 For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.

Additions to Definition of Terms of the licence

- NSW Industrial Noise Policy - the document entitled "New South Wales Industrial Noise Policy published by the Environment Protection Authority in January 2000."
- Noise - sound pressure levels' for the purposes of conditions L6.1 to L6.7

M8.1 To assess compliance with Condition L6.1, attended noise monitoring must be undertaken in accordance with Conditions L6.5 and:

- a) at each one of the locations listed in Condition L6.1;
- b) occur annually in a reporting period;
- c) occur during each day and early morning shoulder period as defined in Condition L6.2 above for a minimum of:
 - 1.5 hours during the day; and
 - 30 minutes during the early morning shoulder.
- d) occur for three consecutive operating days.

Air Quality Conditions

OX Dust

OX.1 The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises;

OX.2 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.

Complaints Management

E1 Complaints Management System

Prior to the commencement of any activity at the Premises, the proponent must develop a complaints management system to be incorporated in the Environmental Management Plan for the facility. The system shall include, but not be limited to:

- a hotline for receiving any complaints from the community in relation to activities conducted at the premises;
- a commitment by the proponent to:
 - investigate potential sources of noise and dust, taking into account on site activities and meteorological data at the time of the complaint;
 - take immediate action to reduce noise and dust impacts if they are currently occurring at the time of the complaint;
 - contact the complainant about the action taken in response to the complaint
- a record of complaints and the proponent's responses or actions, readily accessible to the community and regulatory authorities, and
- a system for providing feedback to the community.

Stormwater management

1. The external surfaces of the perimeter mounds shall be stabilised by vegetation during the life of the project, to minimise the generation of dust and turbid stormwater runoff.
2. The internal surfaces of the perimeter mounds shall be stabilised with vegetation within one month of the completion of excavation works on these mounds, to minimise the generation of dust and turbid stormwater runoff.
3. The stormwater basin discharge outlets shall have a valve/riser installed to facilitate the controlled discharge of stormwater once this has been tested to be compliant with the discharge parameters as determined in the Environment Protection Licence.
4. The two spillways from the stormwater detention basins and the subsequent discharge path down the vegetated mound shall be sufficiently stabilised to mitigate erosion created by this discharge.
5. The site accessway shall be suitably constructed to ensure the potential for turbid runoff discharging from this area will be minimised.

Operating Hours

(To be clarified by proponent)

Site preparation activities:

- Monday to Friday: 7am to 6pm
- Saturday: 8am to 1pm
- No work on Sundays or Public Holidays

Normal Operation hours:

Loading of trucks

Monday to Friday: 6:00am to 6:00pm
Saturday: 7:00am to 4:00pm

Truck movements

Monday to Friday: 6:00am to 6:00pm
Saturday: 7:00am to 4:00pm

Use of crusher/screens

Monday to Friday: 7:00am to 6:00pm
Saturday: 7:00am to 4:00pm.

Landfill Gas Accumulation

The construction of the onsite facilities shall be designed to address the potential for landfill gas accumulation.

Waste excavation and receipt

Prior to the commencement of activity at the Premises, the proponent shall prepare a management plan outlining the processes that will be implemented to identify and lawfully remove unapproved waste from the imported and in-situ waste material.

ATTACHMENT C – DRAFT LICENCE CONDITIONS

The following draft licence conditions are provided to indicate the potential requirements of an Environment Protection Licence that are relevant for consideration in the assessment of this application. Please note that as the EPA has not received a licence application for the proposed works, these conditions may alter in due course.

Administrative Conditions

- A1.1** This licence authorises the carrying out of the scheduled activities listed below at the premises specified. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.

Scheduled Activity Fee Based Activity Scale

Resource Recovery	Recovery of general waste	> 0 T recovered
Waste Storage	Waste storage - other types of waste	> 0 T stored

Discharges to Air and Water and Applications to Land

P1 Location of monitoring/discharge points and areas

- P1.1** The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.

Air

EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Description of Location
1	Meteorological Monitoring		To be determined

- P1.2** The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.

- P1.3** 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.

Water and land

EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Description of Location
2	Sediment Dam 1		To be determined
3	Sediment Dam 2		To be determined

Limit Conditions

L1 Pollution of Waters

Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.

L2 Concentration limits

L2.1 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.

L2.2 Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.

L2.3 To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\>s.

L2.4 Water and/or Land Concentration Limits

Point 2, 3

Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit
TSS	Milligrams/litre				50
pH	pH				5.5-8.5
To be determined					

L3 Waste

L2.1 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.

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.

Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below.

This condition does not limit any other conditions in this licence.

Waste	Description	Activity	Other Limits
To be determined			
Building and demolition waste	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage Resource recovery	NA
General or Specific exempted waste	Waste that meets all the conditions of a resource recovery exemption	As specified in each particular resource	NA

	under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2005	recovery exemption	
Waste	Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time		NA

L3 Hours of Operation

(To be clarified by proponent)

Site preparation activities:

- Monday to Friday: 7am to 6pm
- Saturday: 8am to 1pm
- No work on Sundays or Public Holidays

Normal Operation hours:

Loading of trucks

Monday to Friday: 6:00am to 6:00pm

Saturday: 7:00am to 4:00pm

Truck movements

Monday to Friday: 6:00am to 6:00pm

Saturday: 7:00am to 4:00pm

Use of crusher/screens

Monday to Friday: 7:00am to 6:00pm

Saturday: 7:00am to 4:00pm.

L4 Potentially offensive odour

The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.

Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.

L6 Noise and Meteorological Conditions

- L6.1 Noise generated at the premises must not exceed the noise limits in the table below. The locations referred to in the table below are indicated by Figure 3-1 of '2 Albert Street, St Peters Materials Recycling Facility – Noise Impact Assessment' (NIA) prepared by Wilkinson Murray dated 2 April 2012 (Report Number 09355 Version D).

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A	47	47	60

<i>B</i>	52	46	54
<i>C</i>	44	43	55
<i>Sydney Park</i>	55	55	N/A

L6.2 For the purpose of condition L6.1;

- Daytime is defined as the period from 7am to 6pm Monday to Friday, and 7am to 4pm Saturday.
- Early morning shoulder is defined as the period from 6am to 7am Monday to Friday.

L6.3 The noise limits set out in condition L6.1 apply under all meteorological conditions except for the following:

- d) Wind speeds greater than 3 metres/second at 10 metres above ground level.
- e) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or
- f) Stability category G temperature inversion conditions.

L6.4 For the purposes of condition L6.3:

- c) Data recorded by the Bureau of Meteorology station at Sydney Airport must be used to determine meteorological conditions; and
- d) Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part E4 of Appendix E to the NSW Industrial Noise Policy.

L6.5 To determine compliance:

- b) with the $L_{eq(15 \text{ minute})}$ noise limits in condition L6.1, the noise measurement equipment must be located:
 - approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or
 - within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable
 - within approximately 50 metres of the boundary of a National Park or a Nature Reserve.
- d) with the $L_{A1(1 \text{ minute})}$ noise limits in condition L6.1, the noise measurement equipment must be located within 1 metre of a dwelling façade.
- e) with the noise limits in condition L6.1, 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 L6.5(a) or L6.5(b).

L6.6 A non-compliance of condition L6.1 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 L6.5(a) and L6.5(b); and/or
- at a point other than the most affected point at a location.

L6.7 For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.

Additions to Definition of Terms of the licence

- NSW Industrial Noise Policy - the document entitled "New South Wales Industrial Noise Policy published by the Environment Protection Authority in January 2000."
- Noise - sound pressure levels' for the purposes of conditions L6.1 to L6.7

Operating Conditions

O1 Activities must be carried out in a competent manner

Licensed activities must be carried out in a competent manner. This includes:

- a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and
- b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

O2 Maintenance of plant and equipment

All plant and equipment installed at the premises or used in connection with the licensed activity:

- a) must be maintained in a proper and efficient condition; and
- b) must be operated in a proper and efficient manner.

O3 Dust

O3.1 The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.

O3.2 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.

O4 Stormwater management

O4.1 The external surfaces of the perimeter mounds shall be stabilised by vegetation during the life of the project, to minimise the generation of dust and turbid stormwater runoff.

O4.2 The internal surfaces of the perimeter mounds shall be stabilised with vegetation within one month of the completion of excavation works on these mounds, to minimise the generation of dust and turbid stormwater runoff.

O4.3 The stormwater basin discharge outlets shall have a valve/riser installed to facilitate the controlled discharge of stormwater once this has been tested to be compliant with the EPL discharge parameters.

O4.4 The two spillways from the stormwater detention basins and the subsequent discharge path down the vegetated mound shall be sufficiently stabilised to mitigate erosion created by this discharge.

- O4.5 The site accessway shall be suitably constructed to ensure runoff discharging from this area will achieve appropriate water quality parameters.

M1 Requirement to monitor concentration of pollutants discharged

M1.1 Requirement to monitor meteorological parameters

- M1.2 For each monitoring point specified in the table below, the applicant must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1. The applicant must use the sampling method, units of measure, averaging period and sample at the frequency, specified opposite in the other columns.

POINT 1

Parameter	Units of measure	Frequency	Averaging Period	Sampling Method
Rainfall	mm	Continuous	1 hour	AM-4
Wind speed @ 10 metres	m/s	Continuous	15 minute	AM-2 & AM-4
Wind direction @ 10 metres	°	Continuous	15 minute	AM-2 & AM-4
Temperature @ 2 metres	°C	Continuous	15 minute	AM-4
Temperature @ 10 metres	°C	Continuous	15 minute	AM-4
Sigma theta @ 10 metres	°	Continuous	15 minute	AM-2 & AM-4
Solar radiation	W/m2	Continuous	15 minute	AM-4
Additional requirements				
- Siting				AM-1 & AM-4
- Measurement				AM-2 & AM-4

M2.1 Water and/ or Land Monitoring Requirements

POINT 2, 3

Pollutant	Units of measure	Frequency	Sampling Method
TSS	Mg/L	Special frequency 1	Grab sample
To be determined			

- M2.2 for the purposes of the table above Special frequency 1 means prior to discharge.

M3 Noise Monitoring

- M3.1 To assess compliance with Condition L6.1, attended noise monitoring must be undertaken in accordance with Conditions L6.5 and:
- at each one of the locations listed in Condition L6.1;
 - occur annually in a reporting period;
 - occur during each day and early morning shoulder period as defined in Condition L6.2 above for a minimum of:
 - 1.5 hours during the day; and
 - 30 minutes during the early morning shoulder.
 - occur for three consecutive operating days.

Special Conditions

E1 Noise Monitoring Report

A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the yearly monitoring. The assessment must be prepared by a suitably qualified and experienced acoustical consultant and include:

- an assessment of compliance with noise limits presented in Condition L6.1; and

- b) an outline of any management actions taken within the monitoring period to address any exceedances of the limits contained in Condition L6.1.

E2 Dust Audit

Six months after activities have commenced at the Premises, the Licensee must submit a dust audit report to the EPA's Manager Waste Operations.

The dust audit report must address the following:

- (a) A summary of any dust complaints received and actions taken to reduce dust emissions where complaints are verified;
- (b) Benchmark the design and management practices at the St Peters Materials Recycling premises against industry best practice for minimising dust emissions. This should include, but not be limited to the use of on site meteorological data to inform dust management practices, stockpile management and watering regimes.
- (c) Using the results of (a) and (b), if it is identified that the facility does not meet industry best practice standards for dust minimisation, then the dust audit report shall include:
 - I. the proposed mitigation works and/or management practices to ensure that dust is minimised as far as is practicable; and
 - II. a timetable for the implementation of these works.

E3 Complaints Management System

Prior to the commencement of activities at the Premises, the proponent must develop a complaints management system to be incorporated in the Environmental Management Plan for the facility. The system shall include, but not be limited to:

- a hotline for receiving any complaints from the community in relation to activities conducted at the premises;
- a commitment by the proponent to:
 - investigate potential sources of noise and dust, taking into account on site activities and meteorological data at the time of the complaint;
 - take immediate action to reduce noise and dust impacts if they are currently occurring at the time of the complaint;
 - contact the complainant about the action taken in response to the complaint
- a record of complaints and the proponent's responses or actions, readily accessible to the community and regulatory authorities, and
- a system for providing feedback to the community.

E4 Landfill Gas Accumulation

The construction of the onsite facilities shall be designed to address the potential for landfill gas accumulation.

E5 Waste Excavation and Receipt

- E5.1 To ensure that the EPA can verify the appropriate handling of waste material at the facility and ensure compliance with section 88 of the *Protection of the Environment Operations Act, 1997*, the Licensee shall engage a suitably qualified surveyor to produce initial and annual surveys of the site consistent with the staging in the project application.
- E5.2 The initial survey referred to in E5.1 shall be provided to the Manager, Waste Operations prior to the commencement of operation at the site.
- E5.3 Prior to the commencement of any activity on the Premises, the proponent shall prepare a management plan outlining the processes that will be implemented to identify and lawfully remove unapproved waste from the imported and in-situ waste material.

