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Planning and Assessment Division  
Department of Planning, Industry and Environment  
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Attention: Sheelagh Laguna

### **EPA Advice on Submissions Report**

Dear Ms Laguna

Thank you for the request for advice from Public Authority Consultation (PAE-47439206), requesting the review by the NSW Environment Protection Authority (EPA) of the Submissions Report for the Gunnedah Waste Facility (Application SSD-8530563) at 16 Torrens Road and No. 17-21 Allgayer Drive, GUNNEDAH NSW 2380.

The EPA has reviewed the following documents:

- *Response to Submissions Report* (version A) – Outline Planning Consultants – August 2022 ('Submissions Report')
- *Gunnedah Recycling & Resource Recovery Facility Amendment Report* – Outline Planning Consultants – July 2022 ('Amendment Report') and associated amended appendices.

The EPA understands the proposal is to construct and operate a waste management facility, which will include the construction and operation of a resource recovery and waste transfer facility. The Amendment Report now provides that the proposal will:

- re-purpose existing office buildings and shed;
- construct a hardstand area, upgrade the existing stormwater management, and construct first flush detention basins and water quality treatment devices;
- hazardous waste storage shed is to be removed;
- crushing plant no longer required with the addition of compactor/briquette machine; and
- all unloading and processing activities will occur within fully enclosed sheds.

The EPA also understands that the processed waste is to be transported from the facility for reuse or landfill disposal. The Amendment Report now provides the facility will annually handle up to:

- 200,000 tonnes per annum of non-toxic, non-putrescible waste; and
- Asbestos waste, lithium batteries and acid sulfate soils will no longer be accepted;

Based on the information provided, the proposal is subject to an environment protection licence under sections 43, 47, 55 and/or 122 of the *Protection of the Environment Operations Act 1997* (POEO Act) for waste processing (non-thermal treatment) clause 41 and waste storage clause 42 of Schedule 1 of the POEO Act.

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The EPA has reviewed the Submission Report and notes it has not addressed all of the EPA's submission requirements on this project from 8 February 2021.

The EPA has the following additional comments and recommendations:

## 1. Matters to be addressed prior to determination

### a. Amended Air Quality Impact Assessment (AQIA)

The EPA recommends that further information is provided to the EPA before results and conclusions in the amended AQIA can be verified. The EPA refers to **Attachment A** for detailed comments on the amended AQIA.

If the information requested is provided before determination occurs, the EPA can provide additional recommended conditions of approval for air quality.

### b. Waste streams

The Amendment Report is not clear on what exact waste streams are to be received at the premises or in what quantity. The Amendment Report states that a shredder will be used to process a range of materials including carpets, paper, tyres, textiles and plastics however, no quantities of waste are provided. It is also not clear what volumes of Virgin Excavated Natural Material (VENM) and Excavated Natural Material (ENM) will be received at the premises, and whether this material will be included in the soils waste stream. The Submission Report also advises that concrete waste will no longer be accepted at the premises. However, the Amendment Report provides concrete waste will be included in the Construction and Demolition waste stream. ***The EPA recommends that further information is provided to the EPA on the exact waste streams and quantities to be received at the premises.***

The Submissions Report advises the Excavated Natural Material (ENM) will be accepted at the premises. ***The EPA recommends further information is provided on the procedure for checking that the waste complies with the ENM order and exemption.***

The Amendment report advises that no crushing is to occur at the premises and similar types of waste will be taken to Marys Mount Quarry Landfill. However, the Amendment Report also infers that brick, tiles, concrete and similar waste will be processed at the premises with no details on what processing will occur. ***The EPA recommends that further information is provided on how waste that was previously to be crushed will be processed at the premises.***

The Amendment Report states that Construction and Demolition waste includes slag in this waste stream. Construction waste as defined in the *Protection of the Environment Operations (Waste) Regulation 2014* at clause 90A or the relevant *Standards for managing construction waste in NSW* does not include slag. ***The EPA recommends additional information is provided on the quantities of slag to be received at the premises and how it is to be processed.***

## 2. Matters to be addressed with conditions

### a. Works and activities to be carried out in accordance with the EIS

Except as expressly provided by the general terms of approval, works and activities must be carried out in accordance with the Proposed Waste Facility Environmental Impact Statement (as amended).

### b. Pollution of waters

Except as expressly provided by an Environment Protection Licence (EPL) under the *Protection of the Environment Operations Act 1997* in relation of the development, section 120 of the *Protection of the Environment Operations Act 1997* must be complied with in and in connection with the carrying out of the development.

Any variations to the EPL are to be negotiated with the EPA.

**c. Stormwater and sediment control – construction phases**

An Erosion and Sediment Control Plan (ESCP) must be prepared for all aspects of the construction phase of the development and must be implemented. Implementation of the scheme must avoid or minimise the impacts of stormwater runoff from and within the premises during construction.

The Stormwater Management Plan should be consistent with the practices and principles contained in *Managing Urban Stormwater – Soils and Construction, Volumes 1 and 2* (Landcom, 2004; DECC, 2008).

**d. Stormwater and sediment control – operational phases**

An Erosion and Sediment Control Plan (ESCP) must be prepared for all aspects of the operation phase of the development and must be implemented. Implementation of the scheme must avoid or minimise the impacts of stormwater runoff and within the premises during operation.

The Stormwater Management Plan should be consistent with the practices and principles contained in *Managing Urban Stormwater – Soils and Construction, Volumes 1 and 2* (Landcom, 2004; DECC, 2008).

**e. Dust**

Activities occurring at the premises must be carried out in a manner that will minimise emissions of dust from the premises.

**f. Noise Limits**

Updated recommended noise limit conditions are provided in **Attachment B**.

**g. Waste**

The proponent must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column title “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.

Code	Waste	Description	Activity	Other Limits
NA	<i>Individual waste streams to be confirmed with proponent.</i>		Waste processing (non-thermal treatment) Waste storage	<i>Waste quantities to be confirmed with proponent.</i>

The proponent must not cause, permit or allow any asbestos waste, or asbestos containing materials, or lithium batteries, or acid sulfate soils, to be received at the premises for any purpose.

The total tonnage of waste stored at the premises must be temporary storage only and not exceed 200,000 tonnes per annum.

The proponent must have in place and implement procedures to identify and prevent the disposal of any waste not permitted to be received at the premises.

**h. Financial Assurance**

Prior to the commence of operations at the premises, the proponent must provide to, and receive endorsement in writing from the EPA, a Financial Assurance proposal, prepared in accordance with the following NSW EPA documents:

- Financial Assurance Policy (2022); and
- Guidelines on Estimating Financial Assurances (2022).

These guidelines are available at: <https://www.epa.nsw.gov.au/licensing-and-regulation/legislation-and-compliance/policies-and-guidelines/financial-assurance>.

The Financial Assurance is to be an amount equivalent to the cost of all rehabilitation works associated with the premises.


Note: Once agreed to, the EPA will amend the EPL to require the financial assurance to be provided in the form of an unconditional and irrevocable guarantee from an Australian bank, building society or credit union, in favour of the NSW EPA, and the requirement for the financial assurance will remain within the conditions of the EPL.

Mandatory environment protection licence conditions are provided for your information at **Attachment C**.

The EPA would appreciate the opportunity to comment on the draft conditions of approval prior to finalisation.

If you have any questions about this request, please contact me on 4908 6804 or via email at [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to be 'D. Stokes', with a long horizontal flourish extending to the right.

**DANIEL STOKES**  
**Acting Unit Head Regional Operations**  
**Regulatory Operations Regional West**

## **Attachment A – EPA detailed comments on the information provided**

### **The EPA has reviewed:**

- Gunnedah Waste Facility, Air Quality & Greenhouse Gas Assessment, prepared by Outline Planning Consultants Pty. Limited, dated August 2022 (The amended AQIA)

#### **1) Unclear how the 260 days of operation per year were modelled**

It is acknowledged that the proposed facility will operate 260 days per year. However, it is unclear if the estimated emission rates were modelled for every day of the year (i.e., 365 days), which will provide a set of results representative of potential impacts due to the operating regime and representative daily meteorological conditions. Therefore, providing a robust assessment of the potential impacts due to the proposal.

***The EPA recommends the proponent should clarify how emissions were modelled. If modelling does not assume emissions for every day of the year, then the dispersion modelling should be revised, and modelling results updated accordingly.***

#### **2) The methodology to estimate cumulative must be revised**

Different to the previous approach, cumulative impacts for 24-hr PM<sub>10</sub> concentrations were estimated by using the maximum recorded concentration (31 µg/m<sup>3</sup>) at the Whitehaven Siding Coal Loader and Preparation Plant (CHPP) high-volume air sampler (HVAS). It should be noted that HVAS is a non-continuous monitoring instrument that only collects 24-hour averaged PM<sub>10</sub> data every 6 days. The HVAS data collection cycle only covers approximately 17 % of the days within a year. Therefore, the recorded data may not have captured maximum background levels and should not be used to estimate annual average concentrations.

The EPA advises that the method to assess cumulative impacts is not in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (The Approved Methods) and does not adequately assess potential cumulative impacts representative of maximum recorded background levels.

***The EPA recommends the amended AQIA be revised to include ambient monitoring data that includes at least one year of continuous measurements as required in Section 5.1.1 the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW.***

#### **3) Contour plots show that there are predicted exceedances at some of the identified receptors**

Contour plots presented in Appendix B in the amended AQIA show that there are exceedances predicted at receptors R6, R8, R9, R10.

Pollutant	Receptors where exceedances are predicted
Annual PM <sub>10</sub>	R6, R9
24-hr PM <sub>10</sub>	R6, R8, R9, R10
Annual PM <sub>2.5</sub>	R9 (Unclear but likely)

Although it is not clearly stated, the EPA understands that results (presented in tables and contour plots) were estimated using a Level 1 approach. This level of assessment requires that the maximum background concentration of the pollutant being assessed is added to the maximum 100<sup>th</sup> percentile dispersion model prediction to obtain the total impact for each averaging period.

When exceedances are predicted by using Level 1 assessment, a more refined approach can be used (Level 2 - contemporaneous), where the estimated cumulative impacts are calculated by

adding each individual dispersion model prediction to the corresponding measured background concentration. However, this level of assessment has not been undertaken and therefore, it is considered that further analysis is required to robustly demonstrate that the proposal will not result in additional exceedances at any of the identified receptors (R1 to R19).

***The EPA recommends the amended AQIA be revised to demonstrate that the proposal will not result in additional exceedances at any of the identified receptors (R1 to R19).***

***Consideration must be given but not necessarily limited to:***

- a) Undertaking a Level 2 (contemporaneous) assessment in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW.***
- b) Update tables of results to include predicted impacts at all the identified receptors (R1 to R19).***
- c) Provide incremental 24-hr  $PM_{10}$  and 24-hr  $PM_{2.5}$  contour plots.***
- d) Provide cumulative 24-hr  $PM_{10}$  and 24-hr  $PM_{2.5}$  contour plots***

**4) Additional information is required to robustly justify some of the assumptions made in the preparation of the assessment**

The RTS report specifies that whilst crushing is no longer being proposed a shredder will be used to reduce waste size. However, it is unclear:

- a) if this activity will always be undertaken inside the processing sheds.
- b) why it was not included as a source in the emissions inventory.
- c) how likely it is to have a significant effect on the estimated emissions and predicted results.

***The EPA recommends that the AQIA be revised to transparently justify assumed and adopted input variables used to calculate assessed emission. Assumptions should be justified and address issues a-c above.***

## **ATTACHMENT B: Amended Recommend Noise Conditions for the Gunnedah Waste Facility**

- L6.1** Noise generated at the premises must not exceed the noise limits at the times and locations in the table below. The locations referred to in the table below are indicated by Figure 3-3 in Gunnedah Waste Facility Environmental Noise Assessment (Vipac ref: 10550047-2, dated 21 October 2020).

Location	Noise Limits in dB(A)	
	Day (no crushing activity)	Day (during crushing activity)
	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)
10193 Kamilaroi Highway, Gunnedah (Lot 638, DP 755503)	41	47
10221 Kamilaroi Highway, Gunnedah (Lot 450, DP 755503)	41	47
211 Mathias Road, Gunnedah (Lot 455, DP 755503)	41	45
207 Mathias Road, Gunnedah (Lot 635, DP 755503)	41	44
10176 Kamilaroi Highway, Gunnedah (Lot 382, DP 755503)	41	44
Any other residence	41	41

- L6.2** For the purposes of condition L6.1:
- a) Day means the period from 7am to 6pm Monday to Saturday and the period from 8am to 6pm Sunday and public holidays.

- L6.3** Noise-enhancing meteorological conditions

- a) The noise limits set out in condition L6.1 apply under the following meteorological conditions:

Assessment Period	Meteorological Conditions
Day	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.

- b) For those meteorological conditions not referred to in condition L6.3(a), the noise limits that apply are the noise limits in condition L6.1 plus 5dB.

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

- a) The meteorological conditions are to be determined from meteorological data obtained from the meteorological weather station identified as **Bureau of Meteorology AWS at Gunnedah Airport**
- b) Stability category shall be determined using the following method from Fact Sheet D of the *Noise Policy for Industry* (NSW EPA, 2017):
- i. Use of sigma-theta data (section D1.4).

- L6.5** To assess compliance:

- a) with the  $L_{Aeq(15 \text{ minutes})}$  or the  $L_{Amax}$  noise limits in condition L6.1 and L6.3, the noise measurement equipment must be located:
  - (i) approximately on the property boundary, where any residence is situated 30 metres or less from the property boundary closest to premises; or where applicable,
  - (ii) in an area within 30 metres of a residence façade, but not closer than 3 metres where any residence on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable,
  - (iii) in an area within 50 metres of the boundary of a National Park or Nature Reserve,
  - (iv) at any other location identified in condition L6.1
- b) with the  $L_{Aeq(15 \text{ minutes})}$  or the  $L_{Amax}$  noise limits in condition L6.1 and L6.3, the noise measurement equipment must be located:
  - (i) at the reasonably most affected point at a location where there is no residence at the location; or,
  - (ii) at the reasonably most affected point within an area at a location prescribed by condition L6.5 (a).

**L6.6** A non-compliance of conditions L6.1 and L6.3 will still occur where noise generated from the premises is measured in excess of the noise limit at a point other than the reasonably most affected point at the locations referred to in condition L6.5 (a) or L6.5 (b).

**NOTE to L6.5 and L6.6:** The reasonably most affected point is a point at a location or within an area at a location experiencing or expected to experience the highest sound pressure level from the premises.

**L6.7** For the purpose of determining the noise generated from the premises, the modifying factor corrections in Table C1 in Fact Sheet C of the *Noise Policy for Industry* (NSW EPA, 2017) may be applied, if appropriate, to the noise measurements by the noise monitoring equipment.

**L6.8** Noise measurements must not be undertaken where rain or wind speed at microphone level will affect the acquisition of valid measurements.

**L6.9** Truck movements to and from the site be restricted to daytime hours only to minimise the impact on sleep during the night time period.

**L6.10** All construction work at the premises must only be conducted between 7am and 6pm Monday to Friday and 8am and 1pm Saturday. No construction work may be carried out during Sundays and public holidays.

**L6.11** Activities at the premises must only be conducted between 7am and 6pm Monday to Saturday. No activity at the premises may be carried out during Sundays and public holidays. Heavy machinery may only be operated between 7am and 5pm Monday to Friday. No heavy machinery may be operated on Saturdays.

**L6.12** Shredding and trommel activities must only be undertaken:

- (a) between the hours of 7am and 5pm Monday to Friday;
- (b) in continuous blocks of no more than 3 hours, with at least a 1 hour respite between each block of work; and
- (c) up to 1 time per calendar month for a maximum of 2 days in any calendar month, with at least 1 week respite between each occasion.

For the purposes of this condition 'continuous' includes any period during which there is less than a 1 hour respite between ceasing and recommencing any of the work the subject of this condition.

**L6.13** Noise and vibration mitigation measures as described in the *Gunnedah Recycling & Resource Recovery Facility Amendment Report* dated July 2022 to be installed and implemented prior to operations commencing.

## Noise Management Plans



**L6.14** The proponent must prepare and implement an Operational Noise Management Plan (ONMP) that covers all premises based activities and transport operations. The plan must include but need not be limited to:

- a) all measures necessary to satisfy the limits in Table **L6.1** at all times,
- b) a system that allows for periodic assessment of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA) that has the potential to minimise noise levels from the facility,
- c) Effective implementation of identified BMP and BATEA measures, where considered feasible and reasonable,
- d) Measures to monitor noise performance and respond to complaints,
- e) Measures for community consultation including site contact details,
- f) Noise monitoring and reporting procedures.

**L6.15** The proponent must prepare and implement a detailed Construction Noise Management Plan (CNMP), prior to commencement of construction activities, that includes but is not necessarily limited to;

- (a) identification of each work area, site compound and access route (both private and public)
- (b) identification of the specific activities that will be carried out and associated noise sources at the premises and access routes,
- (c) identification of all potentially affected sensitive receivers,
- (d) the construction noise and vibration objectives identified in the Environmental Assessment,
- (e) assessment of potential noise and vibration from the proposed construction methods (including noise from construction traffic) against the objectives identified in the Environmental Assessment,
- (f) where the objectives are predicted to be exceeded an analysis of feasible and reasonable noise mitigation measures that can be implemented to reduce construction noise impacts,
- (g) description of management methods and procedures and specific noise mitigation treatments that will be implemented to control noise and vibration during construction, including the early erection of any operational noise control barriers,
- (h) procedures for notifying residents of construction activities that are likely to affect their noise and vibration amenity,
- (i) measures to monitor noise performance and respond to complaints.

### **Recommended inclusions in the Planning Approval**

That a Traffic Noise Management Strategy (TNMS) be developed by the proponent, prior to commencement of construction and operation activities, to ensure that feasible and reasonable noise management strategies for vehicle movements associated with the facility are identified and applied, that include but are not necessarily limited to the following;

- driver training to ensure that noisy practices such as the use of compression engine brakes are not unnecessarily used near sensitive receivers,
- best noise practice in the selection and maintenance of vehicle fleets,
- movement scheduling where practicable to reduce impacts during sensitive times of the day,
- communication and management strategies for non licensee/proponent owned and operated vehicles to ensure the provision of the TNMS are implemented,
- a system of audited management practices that identifies non conformances, initiates and monitors corrective and preventative action (including disciplinary action for breaches of noise minimisation procedures) and assesses the implementation and improvement of the TNMS,
- specific procedures for drivers to minimise impacts at identified sensitive receivers,
- clauses in conditions of employment, or in contracts, of drivers that require adherence to the noise minimisation procedures and facilitate effective implementation of the disciplinary actions for breaches of the procedures.

## **ATTACHMENT C – MANDATORY CONDITIONS FOR ALL EPA LICENCES**

### **ADMINISTRATIVE CONDITIONS**

#### **Other activities**

(To be used on licences with ancillary activities)

This licence applies to all other activities carried on at the premises, including:

- **Waste processing (non-thermal treatment)**
- **Waste storage**

### **OPERATING CONDITIONS**

#### **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.

#### **Maintenance of plant and equipment**

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

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

### **MONITORING AND RECORDING CONDITIONS**

#### **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.

The record must include details of the following:

- the date and time of the complaint;
- the method by which the complaint was made;
- any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
- the nature of the complaint;
- the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
- if no action was taken by the licensee, the reasons why no action was taken.

The record of a complaint must be kept for at least 4 years after the complaint was made.

The record must be produced to any authorised officer of the EPA who asks to see them.

## 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.

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.

This condition does not apply until 3 months after this condition takes effect.

## REPORTING CONDITIONS

### Annual Return documents

#### ***What documents must an Annual Return contain?***

The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:

- a. Statement of Compliance; and
- b. Monitoring and Complaints Summary.

A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before 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.

#### ***Period covered by Annual Return***

An Annual Return must be prepared in respect of each reporting, except as provided below

*Note: The term “reporting period” is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.*

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.

*Note: An application to transfer a licence must be made in the approved form for this purpose.*

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.

#### ***Deadline for Annual Return***

The Annual Return for the reporting period must be supplied to the EPA 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’).

#### ***Notification where actual load can not be calculated***

(Licences with assessable pollutants)

Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the

licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date.

The notification must specify:

- a. the assessable pollutants for which the actual load could not be calculated; and
- b. the relevant circumstances that were beyond the control of the licensee.

### ***Licensee must retain copy of Annual Return***

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.

### ***Certifying of Statement of Compliance and Signing of Monitoring and Complaints Summary***

Within the Annual Return, the Statement 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.

A person who has been given written approval to certify a Statement of Compliance under a licence issued under the Pollution Control Act 1970 is taken to be approved for the purpose of this condition until the date of first review this licence.

### ***Notification of environmental harm***

Note: The licensee or its employees must notify the EPA 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.

Notifications must be made by telephoning the EPA's Pollution Line service on 131 555.

The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

### ***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.

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.

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; and
- 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;
- g. any other relevant matters.

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.

## **GENERAL CONDITIONS**

### **Copy of licence kept at the premises or on the vehicle or mobile plant**

A copy of this licence must be kept at the premises or on the vehicle or mobile plant to which the licence applies.

The licence must be produced to any authorised officer of the EPA who asks to see it.

The licence must be available for inspection by any employee or agent of the licensee working at the premises or operating the vehicle or mobile plant.