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Attention: Sally Munk

EPA Advice on Environmental Impact Statement – SSD-62855708, 2 - 4 Hale St Botany NSW

Dear Sally

Thank you for the request for advice from Public Authority Consultation (PAE-74322458), requesting the review by the NSW Environment Protection Authority (EPA) of the Environmental Impact Statement (EIS) for the proposed Waste Management Facility, Botany (Application (SSD-62855708) at 2-4 Hale Street, BOTANY, NSW 2019.

The EPA has reviewed the following documents:

- *Coombes Property Group & KLF Group - Waste Management Facility, Botany (Final) - Environmental Impact Statement" - EME Advisory - 15 July 2024.*
- *Waste Management Facility, Botany - Air Quality Impact Assessment - Northstar Air Quality Pty Ltd – 13 May 2024.*
- *2-4 Hale Street, Botany | Building Waste Transfer Facility - Noise and Vibration Impact Assessment Project No. P00945 Revision 004 - E-LAB Consulting - 16 April 2024*
- *Waste Management Facility, Botany - Integrated Water Management Strategy – CJ ARMS – 3 April 2024*
- *2-4 Hale Street, Botany NSW - Coombes Property Group Pty Ltd - Detailed Site Investigation - JBS&G - 25 March 2024*
- *2-4 Hale Street, Botany NSW - Coombes Property Group Pty Ltd - Remedial Action Plan - JBS&G - 25 March 2024*
- *Re: Interim Audit Advice Letter No. 1 - Review of Remediation Action Plan, 2-4 Hale Street, Botany NSW, Ramboll, June 2024*

The EPA understands Coombes Property Group & KLF Group intends to establish a construction and demolition (C&D) waste management facility that would receive up to 300,000 tonnes per annum of C&D waste. It would operate as a waste transfer station undertaking receipt and basic

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sorting with aggregation of material for bulk transport to resource recovery facilities within the KLF group where more advanced sorting and recycling would be undertaken.

Based on the information provided, the proposal will require an environment protection licence under sections 43 and 47 of the *Protection of the Environment Operations Act 1997* (POEO Act), likely for Clause 34 (Resource Recovery), Clause 41 (Waste processing (non-thermal treatment)) and Clause 42 (Waste storage) of Schedule 1 of the POEO Act.

The EPA has the following additional comments and recommendations:

1. Matters to be addressed prior to determination

a. Noise and Vibration Impact Assessment (NVIA)

The EPA has identified several areas of inadequacy with the NVIA as outlined below. We request that these matters are addressed as part of the response to submissions:

Identification of sensitive receivers

- The assessment has categorized nearby residential areas into two groups: RC1 and RC2. As shown in Figure 1 and Table 2 of the NVIA, RC1 is a residential area located within the industrial zone, approximately 80 meters from the proposed development. While the specific addresses of the residential dwellings within RC1 have not been provided, ambient noise monitoring has been conducted at a location identified as LT1 - 3 Hale Street Botany, at the corner of Luland Street. Based on the information presented in Figure 1, it appears that LT1 and RC1 are likely located at 3 Luland Street Botany, rather than 3 Hale Street Botany. Further clarification regarding the exact locations of RC1 and LT1 is necessary.
- The assessment currently does not include or consider the potential noise impacts on residential properties located on Erith Street, approximately 100 meters from the proposed development. It is essential to evaluate the noise exposure of residences on the northern side of Erith Street within the NVIA.
- A comprehensive land use survey should be conducted to accurately determine the location of sensitive receptors, such as residential properties, schools, and hospitals, in relation to the proposed development. This information will be crucial for assessing potential noise impacts and implementing appropriate mitigation measures.

Ambient background noise monitoring

- Noise Monitoring Equipment: The NVIA indicates that long-term ambient background noise monitoring was conducted at three locations: LT1, LT2, and LT3. The monitoring equipment used was a Convergence Instruments Sound Level Meter Data Logger (NSRT_mk3 Type 1). However, the Noise Policy for Industry (NPfI) stipulates that background noise levels should be measured using a noise data logger that meets the accuracy specifications of a Class 2 meter, as defined in AS IEC 61672.1. The Convergence instrument, equipped with a MEMS microphone, is unable to be certified against this standard and therefore does not comply with the NPfI requirements.
- Monitoring Instrument Placement: The NVIA does not provide specific details regarding the placement of the background noise monitoring instruments, such as their height above ground and proximity to reflective surfaces. The NPfI outlines the necessary requirements for the location of monitoring equipment used to assess background noise levels.

It is essential to provide comprehensive information about the micro location of the monitoring instruments, along with an evaluation demonstrating compliance with the NPfl's locational guidelines.

- **Monitoring Location Requirements:** The NVIA indicates that the same monitoring locations, LT1, LT2, and LT3, were used to assess both background noise levels and existing traffic noise levels. However, the locational requirements for measuring background noise and traffic noise differ. The NPfl mandates a free-field location, while the Road Noise Policy (RNP) requires a reverberant location within 1 meter of the exposed façade.

As highlighted earlier, it is crucial to provide a detailed description of the monitoring instruments' micro locations and justify their compliance with the specific requirements of both the NPfl and RNP. Depending on the actual placement, adjustments to the measured noise levels may be necessary.

Furthermore, it is unlikely that the noise levels measured at LT1 or LT2 accurately represent the noise exposure experienced by residents on Erith Street Botany.

Project noise trigger levels (premises-based noise emissions)

- The NPfl stipulates that project noise trigger levels (PNTLs) must be established based on the more stringent of either the project intrusiveness level or the project amenity level, adjusted to an LAeq,15min, dBA descriptor. Given the uncertainties highlighted earlier regarding the acquired background noise levels, the EPA does not support the established project intrusiveness level.
- The NVIA has presented project amenity noise levels by setting them 10 dB below existing industrial noise levels. While the NPfl permits this approach, the NVIA appears to have assumed that measured traffic noise levels are equivalent to existing industrial noise levels without providing any explanation or justification. This approach is not appropriate and does not conform to the NPfl guidelines. Consequently, the EPA does not support the presented project amenity noise levels for RC1 and RC2. These discrepancies will likely impact the established PNTLs and the overall compliance of the proposed development.
- In addition to the points discussed above, NVIA asserts that RC1, a residential flat building located at 3 Luland Street Botany, should be assigned higher PNTLs than those established in the assessment. This recommendation is based on two factors:
 - Location within an Industrial Zone: The residential flat building is situated within an industrial zone.
 - Aircraft Noise Exposure: The building is located in a 30-35 ANEF zone, indicating exposure to aircraft noise. It has been designed to ensure that internal noise levels comply with the aircraft noise requirements specified in AS2012:2015.
- The residential flat building at 3 Luland Street Botany appears to be of modern construction, rather than a legacy structure. Considering that a recent planning decision has permitted a sensitive land use within the industrial zone, the relevant planning authorities should determine an appropriate noise assessment goal for this receiver. This goal should strike a balance between the objectives of the industrial zone and the reasonable level of amenity expected for an approved sensitive land use.

Operational Noise Mitigation

- The NVIA has not explicitly identified the proposed construction details of the warehouse that were considered in the noise modelling. Furthermore, the assessment has not provided specific recommendations regarding the warehouse's construction to

ensure compliance with the established acoustic goals. It is essential to include detailed information about the warehouse construction requirements necessary to meet the confirmed PNTLs within the NVIA.

2. Matters to be addressed with conditions

a. Standard Mandatory and Recommended Conditions

The EPA's recommended conditions of approval for the Proposal are provided at Attachment A. If the Department of Planning, Housing and Infrastructure (DPHI) grants development consent for the Proposal the recommended conditions or equivalent should be considered for incorporation into the consent.

The EPA's standard mandatory conditions for all EPA Licences are provided at Attachment B for reference.

The recommended conditions of approval relate to the development as proposed in the documents and information currently provided to the EPA. This includes our understanding that waste processing activities will take place in a fully enclosed warehouse, including unloading, sorting, stockpiling and reloading. If the development is modified either by the Applicant prior to the granting of consent or as a result of the conditions proposed to be attached to the consent, it will be necessary to consult with the EPA about the changes before the consent is issued. This will enable the EPA to determine whether these recommended conditions of approval need to be modified considering the changes.

The Proponent should be made aware that, consistent with provisions under Part 9.4 of the POEO Act, the EPA may require the provision of a financial assurance and/or assurances. The amount and form of the assurance(s) would be determined by the EPA and required as a condition of a Licence.

If you have any questions or wish to discuss this matter further, please contact Rhys Inez on (02) 9995 6359 or via email at rhys.inez@epa.nsw.gov.au.

Yours sincerely



STEVEN TAN
Unit Head Operations
Environment Protection Authority

Attachment A – Recommended Conditions of Approval

Waste Management Facility – Construction and operation

The EPA recommends the following conditions, or conditions aimed to achieve the equivalent environmental outcomes are included as part of any consent for the proposal.

Administration Conditions

1. Except as expressly provide by any relevant provision of SSD-62855708, works and activities must be carried out in accordance with the proposal contained in:
 - The development application SSD-62855708 submitted to the Department of Planning and Environment;
 - The assessment reports related to the development, including the “Coombes Property Group & KLF Group - Waste Management Facility, Botany - Environmental Impact Statement - EME Advisory (ABN 81 614 383 952) – 15 July 2024.
 - Any additional documents supplied to the EPA in relation to the development.

Pollution of waters

2. Except as may be expressly provided in an Environment Protection Licence for the premises, the licensee must comply with section 120 of the *Protection of the Environment Operations Act 1997*.

Dust

3. Activities must be carried out in a manner which minimises the generation and emission of air pollutants including dust.

Operation

General Conditions

1. Prior to commencement of operation, the Applicant must prepare an Operational Environmental Management Plan. This plan must:
 - Be prepared by a suitably qualified and experienced person/s;
 - Describe how the facility will ensure compliance with any relevant statutory obligations;
 - Detail the processes involved for each aspect of operation
 - Describe how operations will be managed in accordance with any relevant conditions of consent and any other relevant planning or licensing conditions related to the premises.
 - Detail the site-specific training to be provided for operational personnel to ensure compliance with the Operational Environmental Management Plan;

- Detail any potential environmental impacts including discharges and the management measures and procedures in place to mitigate and/or minimise the impacts including but not limited to:
 - waste;
 - air quality inclusive of dust and odour;
 - water;
 - noise;
 - hazardous substances and dangerous goods; and
 - Include details of any monitoring measures;
 - Information regarding any other procedures, processes, and/or management measures to be utilised during operation; and
 - Include a detailed site plan.
2. Automatic roller doors must be installed at the facility. The automatic roller doors must be closed at all times aside from when vehicles are entering and exiting the facility.

Water

Operation Stage Water Management Report

1. Prior to commencement of operation of the facility, the Applicant must prepare an Operation Stage Water Management Report. The report must:
 - Be prepared by a suitably qualified and experienced person/s.
 - Detail the practical measures considered and those to be implemented to avoid discharges and minimise pollution from the facility, including mitigating pollutant sources, disposal options for any polluted water such as discharge to sewer and tankering for offsite disposal, or alternative treatment.

Air

General Air Conditions

1. The premises must be maintained in a manner that prevents and/or minimises air pollution.
2. All operations and activities occurring at the premises must be carried out in manner that prevents and/or minimises the emission of air pollutants, including dust and odour from the premises.
3. All processing, stockpiling and trafficable areas must be completely sealed.
4. Idling of trucks must be minimised where possible.
5. Trucks entering and leaving the premises must be covered at all times, except during loading and unloading.

6. The proponent must ensure that all vehicles leaving the premises must exit through an operational wheel wash to ensure that no material, including sediment, is tracked from the premises onto the public roadway.

Odour

1. The licensee must not cause and/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 offensive odour beyond the boundary of 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.

Air Quality Management Plan

1. The Applicant must prepare and implement an Air Quality Management Plan prior to the commencement of operations at the premises. The Air Quality Management Plan must include, but it not limited to, the following:
 - Proactive and reactive management strategies for managing air pollution from the premises;
 - Key performance indicator(s) for all significant air pollution emission sources;
 - Monitoring methods(s) to ensure key performance indicators are achieved;
 - Location, frequency and duration of monitoring;
 - Record keeping;
 - Response mechanisms and contingency measures;
 - Responsibilities for operational personal in relation to air pollution management; and
 - Compliance reporting.

Waste Conditions

General

1. 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 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.

Waste	Description	Activity	Other Limits
Mixed waste (recyclable)	General solid waste (non-putrescible) as defined in Clause 49 of Schedule 1 of the POEO Act.	Waste processing (non-thermal treatment) / Waste storage	The facility shall only receive and process non-hazardous, non-restricted solid waste, and shall not engage in thermal treatment activities.
Mixed waste (non-recyclable)	General solid waste (non-putrescible) as defined in Clause 49 of Schedule 1 of the POEO Act.	Waste processing (non-thermal treatment) / Waste storage	The facility shall only receive and process non-hazardous, non-restricted solid waste, and shall not engage in thermal treatment activities.
Building and demolition waste	General solid waste (non-putrescible) as defined in Clause 49 of Schedule 1 of the POEO Act.	Waste processing (non-thermal treatment) / Waste storage	The facility shall only receive and process non-hazardous, non-restricted solid waste, and shall not engage in thermal treatment activities.
Vegetation waste	General solid waste (non-putrescible) as defined in Clause 49 of Schedule 1 of the POEO Act.	Waste processing (non-thermal treatment) / Waste Storage	The facility shall only receive and process non-hazardous, non-restricted solid waste, and shall not engage in thermal treatment activities.
Timber and wood waste	General solid waste (non-putrescible) as defined in Clause 49 of Schedule 1 of the POEO Act.	Waste processing (non-thermal treatment) / Waste Storage	The facility shall only receive and process non-hazardous, non-restricted solid waste, and shall not engage in thermal treatment activities.
Treated and untreated timbers	General solid waste (non-putrescible) as defined in Clause 49 of Schedule 1 of the POEO Act.	Waste processing (non-thermal treatment) / Waste Storage	The facility shall only receive and process non-hazardous, non-restricted solid waste, and shall not engage in thermal treatment activities.
Metals	General solid waste (non-putrescible) as defined in Clause 49 of Schedule 1 of the POEO Act.	Waste processing (non-thermal treatment) / Waste Storage	The facility shall only receive and process non-hazardous, non-restricted solid waste, and shall not engage in thermal treatment activities.
Paper and cardboard	General solid waste (non-putrescible) as defined in	Waste processing (non-thermal treatment) / Waste	The facility shall only receive and process non-hazardous, non-restricted

	Clause 49 of Schedule 1 of the POEO Act.	Storage	solid waste, and shall not engage in thermal treatment activities.
Asphalts	General solid waste (non-putrescible) as defined in Clause 49 of Schedule 1 of the POEO Act.	Waste processing (non-thermal treatment) / Waste Storage	The facility shall only receive and process non-hazardous, non-restricted solid waste, and shall not engage in thermal treatment activities.
Excavated natural materials	General solid waste (non-putrescible) as defined in Clause 49 of Schedule 1 of the POEO Act.	Waste processing (non-thermal treatment) / Waste Storage	The facility shall only receive and process non-hazardous, non-restricted solid waste, and shall not engage in thermal treatment activities.

2. Any waste for processing, storage or resource recovery at the premises must be assessed and classified as per the EPA Waste Classification Guidelines as in force from time to time.
3. The proponent must comply with the requirements set out in the EPA Standards for managing construction waste in NSW as in force from time to time.
4. The proponent must ensure compliance with all of the requirements of any resource recovery order and exemption applicable to the activities conducted at the premises.
5. The proponent must ensure that any mobile plant utilised for operations at the premises will be managed and maintained in a manner which will prevent any potential for contamination between the different wastes and materials handled at the premises.
6. All non-conforming waste received at the premises must be disposed of at a facility that can lawfully receive that type of waste within seventy-two (72) hours of receipt at the premises.
7. No material or waste is permitted to be received, processed or stored externally except as provided by a licence under the *Protection of the Environment Operations Act 1997* in relation to the development or by any relevant development consent in relation to the development.
8. Putrescible waste is not permitted to be received, processed, or stored at the premises.
9. The maximum quantity of waste permitted to be received at the premises is 300,000 tonnes in any 12-month period.
10. The licensee must install, maintain and operate a calibrated weighbridge to record all the volume of all waste brought into the premises.

Operational Waste and Material Management Plan

1. Prior to the commencement of operations at the facility, the Applicant must prepare an Operational Waste and Material Management Plan. This plan must:
 - Be prepared by a suitably qualified and experienced person/s;

- Include a detailed assessment of the waste and management material processes to be undertaken during operation of the facility. This includes at a minimum but was not limited to:
 - details of the sources of waste/materials to be received (including the source of each type of waste and material for each of the proposed facilities);
 - details of the types and quantities of each type of waste/materials to be received;
 - details of the maximum volume of each waste/material to be stored at any one time;
 - details of the maximum annual throughput of each waste/material to be processed;
 - a detailed description of processing procedures for each waste and material type;
 - a description of how the EPA's record-keeping and reporting requirements will be met, including weighing material in and out;
 - the intended fates of all other waste and materials received/produced on site which are not suitable for re-use;
 - any testing and/or sampling procedures relevant to each waste and/or material type;
 - details of any materials produced under a Resource Recovery Order, and the controls/procedures in place for meeting the conditions of that order;
 - details regarding any other waste/material to be received, stored, or processed under a Resource Recovery Order and/or Resource Recovery Exemption and any relevant controls/procedures in place to ensure the waste/material meets the requirements of that Resource Recovery Order and/or Exemption; and
 - a description of procedures for dealing with non-conforming waste and materials (i.e. waste not permitted to be received).
- Include detailed information regarding how waste and material will be managed during receipt, processing, and storage to ensure the prevention and/or minimisation of any potential environmental impacts;
- Detail the classification of each type of waste to be received, processed, and stored in accordance with the EPA Waste Classification Guidelines and, where possible, provide a definition for each type of waste which meets a definition under definitions provided in Schedule 1 of the *Protection of the Environment Operations Act 1997*. Where a waste type does not meet an exact definition under Schedule 1, a detailed description of the waste type should be provided;
- Include a characterisation of the physical and chemical contact of each waste type; and
- Details regarding who will be permitted to transport and dispose of waste and/or materials to the facility and who will be permitted to collect and transport waste and/or materials from the facility.

Noise Verification

The below recommended conditions would apply subject to the proponent addressing the issues identified in the NVIA and EIS as set out in the main body of this letter.

1. Within 6 months of operations at the facility, the proponent must engage an independent and qualified person or team to complete an operational noise compliance verification and prepare a written verification report.
2. The operational noise verification report must be submitted to DPHI and EPA for review.
3. The operational noise verification report must:
 - a) review the operational noise of the facility against the predictions in the EIS,
 - b) Identify any exceedances of predicted noise levels
 - c) Propose any reasonable and feasible mitigation measures to reduce any exceedances of the noise levels in the EIS and provide a timetable for the implementation of these measures.

Fuel, Oil and Chemical Storage Conditions

1. The proponent must ensure that the layout and design of the facilities (and any other relevant areas of the premises) as constructed meets the specifications and requirements outlined in:
 - AS 1940 – The storage and handling of flammable and combustible liquids; and
 - AS 3780 – The storage and handling of corrosive substances.
2. All above ground tanks containing chemicals capable of causing harm to the environment if they spill or leak must be stored within a covered and bunded area, or within an appropriate alternative spill containment system that achieves the same outcome.
3. Bunds must:
 - Have walls and floors constructed of impervious materials;
 - 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);
 - Have floors graded to a collection sump; and
 - Not have a drain valve incorporated in the bund structure or be constructed or operated in a manner that achieves the same environmental outcome

Site Contamination

1. A NSW EPA-accredited Site Auditor (Auditor) must be engaged for the duration of construction works to audit contamination investigations, remediation, and validation work.
2. The Auditor shall issue a Section A - Site Audit Statement and Report at the completion of work, certifying the suitability of the land for the intended use.
3. The Auditor shall submit a Section A - Site Audit Statement to the NSW EPA certifying the appropriateness of the contamination investigations, remediation, and validation work.

Attachment B – Standard Conditions for all EPA Licences

Operating Conditions

Activities must be carried out in a competent manner

1. Licensed activities must be carried out in a competent manner. This includes:
 - The processing, handling, movement and storage of materials and substances used to carry out the activity; and
 - The treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

Maintenance of plant and equipment

1. 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.

Emergency Response Conditions

Pollution Incident Response Management Plan

1. The licensee must maintain and implement as necessary, a current Pollution Incident Response Management Plan for the premises.

Note: The licensee must develop their Pollution Incident Response Management Plan in accordance with the requirements in Part 5.7A of the *Protection of the Environment Operations Act 1997* and the POEO Regulations.

Monitoring and Recording Conditions

Recording of pollution complaints

1. The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.
2. 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.
3. The record of a complaint must be kept for at least four (4) years after the complaint was made.
 4. The record must be produced to any authorised officer of the EPA who asks to see them.

Telephone complaints line

1. The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.
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.
3. The preceding two (2) conditions do not apply until five (5) days after the issue of this licence.

Reporting Conditions

Annual Return

What documents must an Annual Return contain?

1. The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:
 - Statement of Compliance; and
 - Monitoring and Complaints Summary.
2. 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

1. 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.
2. Where this licence is transferred from the licensee to a new licensee:
 - 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

- 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.

3. 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:
 - In relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
 - In relation to the revocation of the licence – the date from which notice revoking the licence operates.

Deadline for Annual Return

1. The Annual Return for the reporting period must be supplied to the EPA by registered post not later than sixty (60) days after the end of each reporting period or in the case of a transferring licence not later than sixty (60) days after the date the transfer was granted (the 'due date').

Licensee must retain copy of Annual Return

1. The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least four (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

1. Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:
 - The licence holder; or
 - 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

1. Notifications must be made by telephoning the EPA's Environment Line service on 131 555.
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 Protection of the Environment Operations Act 1997.
2. The licensee must provide written details of the notification to the EPA within seven (7) days of the date on which the incident occurred.

Written Report

1. Where an authorised officer of the EPA suspects on reasonable grounds that:

- Where this licence applies to premises, an event has occurred at the premises; or
- 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.

2. The request may require a report which includes any or all of the following information:

- The cause, time and duration of the event;
- The type, volume and concentration of every pollutant discharged as a result of the event;
- 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 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;
- Action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
- Details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
- Any other relevant matters.

3. 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.