ViridIFC

# 3 Yearly Statutory Independent Environmental Audit Corrective action Plan list

**Riverine Oils & BioEnergy Pty Ltd**

**V23-299.RT1.02**

**22 November 2023 | Commercial in Confidence**

viridifc.com.au

| No | Corrective action | Action | Completion date |
|---|---|---|---|
| 5 | No application has been made. It is noted that an approval modification will be required for multiple aspects of operation in the near future and this item should be included at this time.<br>No environmental harm is occurring because of this issue. | We are reviewing the financial viability and will if required do a Consent modification in the future. | June 2024 |
| 7 | Sampling locations have not been amended for EPA 2 and EPA 3.<br>Airlabs should be directed to review sampling locations for adequacy and conformance during their next 6-monthly sampling round.<br>Evidence:<br>• EI-4 EI-5 EI-6 EI-7 – Air emissions reports 2022 – 2023<br>No environmental harm is occurring as a result of this issue. | Robe will have a discussion with Airlabs about the location of the sampling points and it they are fit for purpose. | June 2024 |
| 14 | A CLG has not been maintained. Alternate communications have been available including the web-site, newsletters and phone line.<br>The absence of any complaints in the last 3 years would indicate that this approach is fit for purpose for continuing operations.<br>Evidence:<br>• EI-36 – Environmental newsletter<br>Recommendation: Seek to amend approvals to align with current practice. | Robe will look at beginning teams meeting with all stakeholders, ROBE already places most of the required information on our website. | June 2024 |
| 23 | The basis for the previous conclusion is that for an 8.5m tank the setback should be 4.25m which is strictly correct under AS3780 – Requirements for storage of corrosive materials.<br>Virid IFC view is that while a greater setback would be preferable and technically required for strict conformance with AS3780, the probability of loss outside the bund is low and environmental consequence minor as the spill would be captured in the stormwater basin. Furthermore, there is inadequate physical space available to increase the offset.<br>Recommendation: ROBE should undertake a formal risk assessment to verify that the current arrangements are fit for purpose and do not pose an unacceptable environmental or safety risk. | Robe will do a risk assessment on the what the risk is in case of any damaged to the caustic tank. 30/12/2023 | June 2024 |
| O3.1-2 | The only observable generation of dust observed came from a loader travelling along an unsealed internal road. No water cart was in operation for dust suppression.<br>It is understood that during harvest season, a much higher traffic volume will use this road but that water carts are used to suppress dust.<br>Vital Bon-Matt HR, a concentrated liquid emulsion is used on unsealed roads to prevent dust generation.<br>There remains potential for excessive dust to be generated from this road. It is recommended that one or more of the following be implemented: **No**<br>• dust suppression compound be applied to the road<br>• road surface is re-sheeted with a low fines content capping layer (e.g. gravel, CTB) Evidence:<br>• EI-34 – Vital Bon-Matt HR Product Data Sheet<br>• EI-35 – Vital Bon-Matt HR Safety Data Sheet<br>• Photo 24: Access track to bulk grain storage - note dust generation | The use of a dust suppressant chemical to suppress the dust, the chemical we are we going to use is Vital Bon Matt chemical or something similar. | June 2024 |
| 4.2E | It is noted that the requirement is broad and non-specific in nature. However, the site was inspected and the inspection included all major work areas as described previously. It is the opinion of the auditor that the works are carried out "generally in accordance with" the provisions listed here in<br>with the following exception:<br>The "revised site plan" as approved does not include the "seed bunker" located north of the processing area. | An amendment of the approval is recommended to ensure the "revised site plan" is consistent with the actual site plan. Robe has started Consent Modification MOD7 to have the bunkers classified as storage facility. This Modification of ROBEs consent will be applied for in June 2024. | June 2024 |
| 66-67 | Within 3 months of submitting an audit report to the Secretary, the Applicant must review and if necessary Previous audit outcomes were not all completed within the required timeframe. revise the strategy/plans/programs required under this approval to the satisfaction of the Secretary. Note actions were completed prior to this audit so no further action possible | Audit corrective action plan will be created, managed, and completed by EHS manager. | June 2024 |

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| General | OEMP is present and contains ESCP type information. However bulk grain store areas is not considered hence ESCP is not adequate and requires revision<br>Evidence:<br>• EI-15 - OEMP is part of Soil and Water Management Plan<br>Recommendation: Develop an Erosion and Sediment Control Plan, especially for "seed bunker" area. | Erosion control will be managed when ROBE is doing the bunker modification to upgrade and approve the bunkers. | June 2024 |
| Additional general | Additional Applicant will facilitate the establishment of a community liaison group to keep communication open No CLG has been established with communication with the community facilitated using general between the Applicant and the public regarding issues that may arise during construction and other means including: | Robe will look at beginning teams meeting with all stakeholders, ROBE already places most of the required information on our website. | June 2024 |

# 1 Previous Audit Recommendations and Corrective Actions

| No. | Recommendation | Corrective Action | Compliance (Yes/No) |
|---|---|---|---|
| 1 | The water balance spreadsheet should include the WWTP pond's evaporation and rainfall values for Wagga Wagga in order to calculate the ability of the pond to evaporate all of the incoming water. As evaporation and rainfall varies across the year, the calculations should be carried out on a monthly basis over a 12 month period using the monthly evaporation and rainfall values for a "wet" or high rainfall year. The change in pond height should be calculated for each month. The maximum safe pond height should then be determined for each month, i.e. how high can the pond level be before there is a risk of an overflow at some point in the future. To assist implementation of the process, a pond level indicator should be installed in the pond to allow the pond level and freeboard to be easily observed. The pond should then be inspected on a weekly basis and the pond level record. | Water balance calculations have been revised and it has been determined the pond is of sufficient capacity over time. Accumulating water in wet years but typically in deficit. Calculations are provided in the Water Management Plan.<br>Evidence:<br>• EI-15– Soil and Water Management Plan | Yes |
| 2 | ROBE should develop an emergency water irrigation plan if it appears an overflow of the evaporation pond may occur. The plan should define the circumstances under which irrigation will be required. | Based on the new water balance (Evidence item 14, Page 23), this is no longer considered necessary as several years of above average rainfall would be required before capacity constraints would arise.<br>Evidence:<br>• EI-15 – Soil and Water Management Plan | Yes |
| 3 | As a significant portion of odour is not due to $H_2S$ and as continuous TRS monitoring (which includes $H_2S$) is already occurring, ROBE should request that the EPA amend the EPL monitoring conditions to remove the requirement for $H_2S$ monitoring and that it should require odour monitoring of emissions from DPs 2, 3 and 14 instead. | The absence of odour related complaints for the last 3 years indicates that ongoing odour emissions are not of concern. Current emissions monitoring program is considered to be adequate. | Yes |

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| 4 | The measured odour emissions should be modelled using the correct stack heights. Allowance should be made in the model for the "weather caps" currently installed on DPs 2 and 3. | Emissions monitoring has been completed by Airlabs as required by the approval (with some events missed owing to COVID restrictions on travel)<br>The absence of odour related complaints for the last 3 years indicates that ongoing odour emissions are not of concern. Current emissions monitoring program is considered to be adequate.<br>Evidence:<br>• EI-4 EI-5 EI-6 EI-7 EI-8 EI-9 – Air emission reports. | Yes |
| 5 | As collecting and treating emissions from all site tank vents would be extremely expensive and not result in any measurable or noticeable environmental benefit, ROBE should request that EPA amend the EPL to remove condition O4.2 and request that DPIE amend the Development Consent to remove Conditions 36, 40a. | No application has been made. It is noted that an approval modification will be required for multiple aspects of operation in the near future and this item should be included at this time.<br>No environmental harm is occurring as a result of this issue. We are reviewing the financial viability and will if required do a Consent modification in the future. | **No** |
| 6 | There have only been 3 odour complaints in recent times that all appear to be related to restarting the plant after a maintenance shut. However, if odour becomes a concern in the future, then the issues related to odour discussed in this audit report should be addressed, namely the "weather caps" on DPs 2 and 3 and treatment of the odours compounds other than $H_2S$. | No complaints related to odour have been made since 2020 audit.<br>Evidence:<br>• EI-10– incident complaint register | Yes |

| No. | Recommendation | Corrective Action | Compliance (Yes/No) |
|---|---|---|---|
| 7 | ROBE should request Airlabs Environmental review the location of the sampling plane/s that do not comply with AS4324.1 and determine if there is a complaint location which is easily accessible to the emissions sampling personnel. | Sampling locations have not been amended for EPA 2 and EPA 3.<br>Airlabs should be directed to review sampling locations for adequacy and conformance during their next 6-monthly sampling round.<br>Evidence:<br>• EI-4 EI-5 EI-6 EI-7 – Air emissions reports 2022 – 2023<br>No environmental harm is occurring as a result of this issue. Robe will have a discussion with Airlabs about the location of the sampling points and it they are fit for purpose. | **No** |
| 8 | ROBE should request Airlabs Environmental reference the test method used for $H_2S$ in future reports. | $H_2S$ test method referenced from NSW EPA.<br>Evidence:<br>• EI-4 EI-5 EI-6 EI-7 – Air emissions reports 2022 - 2023 | Yes |
| 9 | The depth to the underlying aquifer should be determined along with lithography underlying the site. Based on this information, the time it would take for any seepage from the site to impact on the groundwater should then be determined. The benefit of continuing ground water monitoring should then be discussed and agreed with EPA (along with the sampling frequency, the analytes and trigger levels if monitoring is deemed warranted). | No groundwater has been encountered since the 2020 audit.<br>Recommend seek removal of groundwater monitoring requirements in any future licence amendment application. | Yes |

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| 10 | Once the steam vent silencer is installed on the seed pre-conditioner pressure relief value vent, it should be tested during day light hours (which is the least sensitive time) to assess the noise reduction. Observations should be made close to the nearest resident (approximately 1 km to the west of the site) to assess the likely impact during the night time period. | Diffuser on the pre-conditioner was installed and tested during the day. Noise was reduced by 30 dB, i.e., from 118 to 88.7 dB. No noise was detected at boundary during venting. An email with all the data was also sent to local EPA on 23.12.2020.<br>Evidence:<br>• EI-10 – incident complaint register | Yes |
| 11 | Methodologies and benchmarks for waste reduction need to be established as required by the Waste Management Plan, Section 4.4.5. Implementation of the waste reduction methodologies and performance against the benchmarks should then be included in the AEMR. | An updated Waste Management Plan was issued in April 2023 and waste benchmarks for 2022 were provided in AEMR for 2022.<br>Evidence:<br>• EI-16 – waste management plan | Yes |
| 12 | The Wastewater Treatment Plant sludge needs to be either classified based on the assessment method define in NSW EPA publication "Waste Classification Guidelines, Part 1: Classifying Wastes", including the October 2016 PFOS/PFHxS/PFOA addendum OR if the residual amounts of free liquid present in the sludge bins could be absorbed, evaporated or solidified or a drier sludge produced, the resultant material could be suitable for landfill. | As given in the AEMRs, the process of reclassification of sludge was started and even after 2 years, it is not successful.<br>All waste is collected by Smallman Bros for disposal and taken to lawfully acceptable facility.<br>Evidence:<br>• EI-16 – Waste management plan<br>• EI-7, EI-8 – AEMRs | Yes |
| 13 | ROBE should confirm that the waste contractors transporting 'trackable' wastes (waste mineral oil, oil/water mixtures) are EPA Authorised Agents by asking them to provide a copy of their EPA issued Authorised Agent certificate or should require copies of the Waste Transport Certificates for each waste load. | Waste Management contract is with Smallmon Bros<br>Evidence:<br>• EI-33 – Smallmon Brothers Pty Ltd EPA EPL Licence 21691 | Yes |

| No. | Recommendation | Corrective Action | Compliance (Yes/No) |
|---|---|---|---|
| 14 | It is recommended that ROBE establish a Community Liaison Group (CLG) which will enable improved dialogue with community representatives, facilitate responses to complaints and help build a "good neighbour" relationship with the local community. The CLG will be particularly important in navigating issues arising from the planned rezoning of the existing 'Industrial' zone to 'Special Activation Precinct' which aims to facilitate development, however, may also heighten community concerns as an outcome. Consideration should also be given to involving other local industries (proactively established as an Industry Forum) so the workload could be shared. | A CLG has not been maintained. Alternate communications have been available including the web-site, newsletters and phone line.<br>The absence of any complaints in the last 3 years would indicate that this approach is fit for purpose for continuing operations.<br>Evidence:<br>• EI-36 – Environmental newsletter<br>Recommendation: Seek to amend approvals to align with current practice. Robe will look at beginning teams meeting with all stakeholders, ROBE already places most of the required information on our website. | **No** |
| 15 | The three Conditional Recommendations made in the February 2020 Risktech Independent Audit of the cooling towers need to be implemented before the next audit in 2021. | As given in AERMS 2021 and 2022, all recommendations were implemented and evident by Council health inspector in Nov 2021 Cooling tower audit Evidence:<br>• EI-7, EI-8 – AEMRs 2021 and 2022<br>• EI-38 – Risktech audit | Yes |

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| 16 | The "Action Plans" in the two Cooling Tower Risk Management Plans should be completed. The action plans should address the risks factors identified in the Management Plan. | Updated as per AERMs 2021 and 2022.<br>Evidence:<br>• EI-7, EI-8 – AEMRs 2021 and 2022<br>• EI-38 – Risktech audit | Yes |
| 17 | ROBE should consult with Ecolab concerning the continual high colony results in the cooling towers. The need for additional dosing should be assessed along with the recommendation in the Cooling Tower Risk<br>Management Plans for side stream filtration or more frequent cleans. A series of alternate options should be developed and then sequentially implemented until the issue is resolved. | AEMR indicated ROBE has consulted NALCO core team and as per their advice in attempt to reduce COC of cooling tower. Colony count monitoring is ongoing.<br>It is understood that no further changes required at this time.<br>Evidence:<br>• EI-7, EI-8 – AEMRs 2021 and 2022 | Yes |
| 18 | The Environmental Management Strategy and the Waste Management Plan should be reviewed and updated to reflect current site conditions and current site controls, rather than referring to intended actions during the facility's construction. A review should be carried out of site documents to determine if a similar updating is required in other site plans and procedures. | The Environmental Management Strategy (EMS) and Waste Management Plan (WMP) was reviewed and updated before 2023 Audit.<br>The EMS was updated in April 2021 and the WMP was updated in April 2023.<br>Evidence:<br>• EI-16 – Waste management plan<br>• EI-32 – Environment management strategy | Yes |
| 19 | ROBE's website should be updated to include records of community complaints, as detailed in Section 5.3.2 of the Environmental Management Strategy. | Website is updated | Yes |
| 20 | Given the planned formation of the Special Activity Precinct and the potential to heighten community concerns, ROBE should consider development of an annual Open Day and a community newsletter. Information concerning the site operations, plans and environmental performance could also be placed on the company's website. | This is not a compliance requirement, just a suggestion | N/A |
| 21 | The legislation listed in Appendix B of the Environmental Management Strategy needs to be reviewed and updated to include all relevant legislation and the related requirements. | Appendix B of the EMS has been updated and the latest version was issued in April 2021. | Yes |

| No. | Recommendation | Corrective Action | Compliance (Yes/No) |
|---|---|---|---|
| 22 | The two unbunded 200L drums of caustic solution near the boiler water treatment plant should be placed on a drum spill pallet. The small roofed area next to the drums should be extended to accommodate the drum spill pallet and prevent rainwater entering it. | Area inspected and considered to be conforming.<br>Evidence:<br>• Photo 23: Chemical small volume storage | Yes |

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| 23 | The inadequate setback between the caustic tank and the bunds to the east and north should be discussed with EPA in light of the fact that any spill would be contained on-site. If EPA deems the risk to be unacceptable, then splash shields should be installed on the inside wall of the bund to effectively raise the bund wall. The shield on the eastern wall should extend at least 4.1m above the top of the bund wall and the shield on the northern wall should extend at least 2.5m above the bund wall. | The basis for the previous conclusion is that for an 8.5m tank the setback should be 4.25m which is strictly correct under AS3780 – Requirements for storage of corrosive materials.<br><br>Virid IFC view is that while a greater setback would be preferable and technically required for strict conformance with AS3780, the probability of loss outside the bund is low and environmental consequence minor as the spill would be captured in the stormwater basin. Furthermore, there is inadequate physical space available to increase the offset.<br><br>Recommendation: ROBE should undertake a formal risk assessment to verify that the current arrangements are fit for purpose and do not pose an unacceptable environmental or safety risk. Robe will do a risk assessment on the what the risk is in case of any damaged to the caustic tank. 30/12/2023 | **No** |
| 24 | The waste caustic IBCs stored in front of the caustic bulk tank should be placed on wheeled pallets so they can be moved as far as possible from the bund wall. | While the recommendation for a wheeled pallet have not been adopted, Waste caustic IBCs are being stored within the bunded area and are not exposed to traffic or other risk factors that make a spill likely. It is our view that the current management practice is appropriate to the risk.<br><br>Evidence:<br>• Photo 6: Caustic and Acid store<br>• Photo 7: Bulk caustic storage | Yes |
| 25 | The square drain holes in the emergency diesel generator steel base should be sealed. The bottom of the steal base should be cleaned and sealed to the concrete slab using a hydrocarbon resistant and flexible sealing compound.<br><br>This will effectively result in the steel base acting as a bund. | Not completed at time of inspection. However, has been completed prior to finalisation of this report.<br><br>Evidence:<br>• Photo 13: Backup generator 1 bund drainhole<br>• Photo 14: Backup generator 2 bund drainhole<br>• Photo 15: Backup generator 3 bund drainhole<br>• Photo 13: Backup generator 1 bund drainhole<br>• Photo 14: Backup generator 2 bund drainhole<br>• Photo 15: Backup generator 3 bund drainhole | **No**<br>(But since rectified) |
| 26 | The IBCs and drums of cooling tower chemicals should not be stored at the edge of the cooling tower dosing chemical pads. Small access ramps should be constructed to allow the delivering forklift to place the IBCs and drums away from the edge of the pad. | New bund area has been constructed.<br><br>Noted bund ideally would be larger but any loss would be captured by stormwater pond.<br><br>Evidence:<br>• Photo 69: Cooling tower water treatment chemicals | yes |

| No. | Recommendation | Corrective Action | Compliance (Yes/No) |
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| 27 | The water leak from the southern cooling tower system should be rectified to prevent any further soil contamination. | Cooling tower inspected and no leakage observed.<br>Assertion that soil contamination will arise in event of leak is incorrect as only clean water used in cooling towers.<br>Evidence:<br>• Photo 68: Cooling tower | Yes |
| 28 | The oil spill at the waste oil storage area on the northern site of the Solvent Extraction Plant should be entered into the incident register, investigated and any appropriate actions taken. The contaminated material from this area should be removed and disposed of using an EPA licensed waste disposal contractor and the area reinstated. | No visible evidence of oil spill noted.<br>Disagree with recommendation to remove contaminated soil. Presence of contamination at that location poses no risk of environmental harm and does not present a safety hazard. | Yes |

# 2 Audit Findings

## 2.1 Environment Protection Licence 13097 - Compliance Table

| Condition No. | Condition | Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|---|
| 1 | **Administrative Conditions** | | | |
| A1 | **What the licence authorises and regulates** | | | |
| A1.1 | This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.<br>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed processing capacity the maximum scale specified in this condition.<br>**Scheduled Activity** / **Fee Based Activity** / **Scale**<br>Agricultural processing / General agricultural processing / > 100000 - 250000 T annual processing capacity | | Review of the 2020, 2021, and 2022 AEMRs revealed that the has remain constant.<br>Evidence:<br>• EI-1, EI-2, EI-3. – AEMRs 2020, 2021 and 2022 | Y |
| A1.2 | The licensee must not carry on any scheduled activities until the scheduled development works are completed, except as | | Note only elsewhere provided in this licence. | Y |
| A2 | **Premises or plant to which this licence applies** | | | |
| A2.1 | The licence applies to the following premises:<br>**Premises Details**<br>RIVERINA OILS AND BIO ENERGY PTY LTD<br>177 TRAHAIRS ROAD<br>BOMEN<br>NSW 2650<br>LOT 12 DP 1130519 | | Riverina Oils & BioEnergy receive and process canola seed at the premises stated in the Environment Protection Licence. | Y |
| A3 | **Other activities** | | | |

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| A3.1 | The licence applies to all other activities carried on at the premises, including:<br>**Ancillary Activity**<br>Chemical Storage | The site stores chemicals (including hexane, caustic soda, phosphoric acid, sulphuric acid & hydrochloric acid) which support its processing operations, emissions pre- treatment, wastewater treatment and treated water reuse and ancillary activities including operation of its cooling tower systems.<br>Note these areas were inspected on 26 Oct 2023. | Y |

| Condition No. | Condition | Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|---|
| **A4** | **Information supplied to the EPA** | | | |
| A4.1 | Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.<br>In this condition the reference to "the licence application" includes a reference to:<br>a) The applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and<br>The licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence. | | Note general condition and subject of audit process | N/A |
| A4.2 | Further references to the licence application include reference to:<br>(a) In accordance with the Environmental Assessment and Statement of Commitment "Integrated Oilseed Processing and Biodiesel Plant Wagga Wagga" prepared by ENSR/AECOM dated March 2008; and (b) In accordance with the Stage 1 – Management Plan Approval dated 12 April 2012. | | Note only | N/A |
| **2** | **Discharges to Air and Water and Applications to Land** | | | |
| **P1** | **Location of monitoring / discharge points and areas** | | | |

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|---|---|---|
| P1.1 | The following points refer.ed 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.<br><br>**EPA identi-fication no.** / **Type of Monitoring Point** / **Type of Discharge Point** / **Location Description**<br>2 / Discharge to Air / Discharge to Air / Combined Vent servicing TAG704,705,2705,2713 and 2782C<br>3 / Discharge to Air / Discharge to Air / Solvent Extraction Plant Scrubber Combined Vent TAG14A, 14B and 136<br>4 / / Discharge to Air / Boiler House Stack for Boiler 1 TAG B1<br>7 / / Discharge to Air / Combined Vent TAG 717, 740, 769 and 703<br>13 / / Discharge to Air / Earth Conveying System TAG609A and TAG603<br>14 / Discharge to Air / Discharge to Air / Filter Blowing Vapour Scrubber TAG629 and TAG6325B/532B<br>15 / / Discharge to Air / High Pressure Stream Generator TAG890HP | Site was inspected. No additional discharge points have been installed since 2020.<br><br>Evidence: Y<br>• Photo 50: Emission monitoring point #2<br>• Photo 53: Emissions monitoring point #14 |
| P1.2 | 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. | Would appear to be a drafting error in the licence documentation as table N/A is not present. |
| **3** | **Limit Conditions** | |
| **L1** | **Pollution of waters** | |

| Condition No. | Condition | Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|---|
| L1.1 | 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. | **120 Prohibition of pollution of waters**<br>(1) A person who pollutes any waters is guilty of an offence.<br>**Note—**<br>An offence against subsection (1) committed by a corporation is an offence attracting special executive liability for a director or other person involved in the management of the corporation—see section 169.<br>(2) In this section—<br>***pollute*** waters includes cause or permit any waters to be polluted. | Site inspected. No evidence of pollution of waters was observed. | Y |
| **L2** | **Concentration limits** | | | |

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| 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 Note – see conditions below in the table. | | Y |
| L2.2 | Air Concentration Limits | Emissions reports reviewed. No exceedances identified.<br>Evidence:<br>• EI-4, EI-5, EI-6, EI-7, EI-8, EI-9– Air emission reports | Y |

| Condition No. | Condition | Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|---|

| Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period |
|---|---|---|---|---|
| milligrams per cubic metre | 50 | | | |
| milligrams per cubic metre | 5 | | | |

| Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period |
|---|---|---|---|---|
| milligrams per cubic metre | 40 | | | |
| milligrams per cubic metre | 5 | | | |

| Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period |
|---|---|---|---|---|
| milligrams per cubic metre | 350 | | | |

| Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period |
|---|---|---|---|---|
| milligrams per cubic metre | 50 | | | |

| Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period |
|---|---|---|---|---|
| milligrams per cubic metre | 50 | | | |

| Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period |
|---|---|---|---|---|
| milligrams per cubic metre | 40 | | | |
| milligrams per cubic metre | 5 | | | |

| Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period |
|---|---|---|---|---|
| milligrams per cubic metre | 350 | | | |

| Condition No. | Condition | Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|---|
| **L3** | **Waste** | | | |
| L3.1 | The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence. | | Site was inspected – including waste storage areas. No evidence was observed indicating waste external to the site was being received.<br>Evidence:<br>• Photo 29: Waste soil stockpile | Y |
| L3.2 | This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if those activities require an environment protection licence. | | Note only | N/A |
| **L4** | **Noise limits** | | | |

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| L4.1 | Noise generated from the premises must not exceed the noise limits presented in the table below:<br>Noise Limits (dB(A))<br><br>Day: LAeq (15 minute) 35<br>Evening: LAeq (15 minute) 35<br>Night: LAeq (15 minute) 35<br>Night: LA11 (1 minute) or La max 45<br>Location: At any residence or other noise sensitive receiver<br><br>Note: a) To determine compliance with the LAeq (15 minute) noise level limits in the above table, noise from the development is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of a dwelling where the dwelling (rural situations) is more than 30 metres from the boundary. To determine compliance with the LA1 (1 minute) noise level limits in the above table, noise from the development is to be measured at 1 metre from the dwelling façade. Where it can be demonstrated that direct measurement of noise from the development is impractical, the EPA may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy).<br>The modification factors in Section 4 of the NSW Industrial Noise Policy must also be applied to the measured noise levels where applicable.<br>b) The noise emission limits identified in the above table apply under meteorological conditions of:<br>• wind speeds of up to 3 m/s at 10 metres above ground level; and<br>• temperature inversion conditions of up to 3ºC/100m, and wind speeds of up to 2 m/s at 10 metres above ground level. | Two noise complaints received in 2020, ROBE has installed diffuser / silencer on pre-conditioner vent in December 2020. EPA was informed of complaint.<br>Verbal advice no complaints regarding noise since 2020 audit Evidence:<br>• EI-10- Incident Complaint Register | Y |
| L4.2 | For the purpose of the above condition:<br>• Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and public Holidays, • Evening is defined as the period from 6pm to 10pm, | Note only | N/A |

| Condition No. | Condition | Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|---|
| | • Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays | | | |

| | | | |
|---|---|---|---|
| L4.3 | The licensee must comply with the hours of operation and construction in the table below, except where the construction activities are not audible at any residence beyond the boundary of the site.<br>Construction and Operation Hours<br>Activity / Day / Time<br>Construction / Monday - Friday / 7:00am to 6:00pm<br>Saturday / 7:00am to 5:00pm<br>Sunday and Public Holidays / Nil<br>Operation / All days / Any time | Operating hours are 24 hours per day, 7 days a week as approved in the condition. | Y licence |
| **L5** | **Potentially offensive odour** | | |
| L5.1 | licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.<br>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. | Four (4) odour complaints received in 2020. EPA was notified of the complaints and a site visit was conducted. No odour sources were identified.<br>Verbally advised no complaints since 2020 audit.<br>Evidence:<br>• EI-10– Incident complaints register | Y |
| L5.2 | No condition of this licence identifies a potentially offensive odour for the purposes of Section 129 of the Protection of the Environment Operations Act 1997. | Note only | N/A |
| **4** | **Operating Conditions** | | |
| **O1** | **Activities must be carried out in a competent manner** | | |
| O1.1 | Licensed activities must be carried out in a competent manner.<br>This includes:<br>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and<br>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. | This condition is general and subjective in nature.<br>The site was inspected. Interviews with site staff:<br>• Clifford Cox (HSE Manager)<br>• Kondala Rao (position)<br>• Danial Challis (General Manager – Operations)<br>The condition of the site and the knowledge of operations expressed by | Y |

| | | | |
|---|---|---|---|
| | | the staff indicates that the licenced activities are conducted in a competent manner. | |

| Condition No. | Condition | Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|---|
| **O2** | **Maintenance of plant and equipment** | | | |
| O2.1 | All plant and equipment installed at the premises or used in connection with the licensed activity:<br>a) must be maintained in a proper and efficient condition; and<br>b) must be operated in a proper and efficient manner. | | The site is subject to a detailed maintenance program which includes 4x 2-day shutdowns and 1x10 day shut down each year.<br>While the audit did not undertake a detailed review of maintenance practices, the site was observed to be in a generally good condition and real-time monitoring of critical plant and equipment was demonstrated from the control room – including real-time emissions monitoring.<br>Available evidence indicated that the site performs necessary maintenance and monitoring. | Y |
| **O3** | **Dust** | | | |

| | | | |
|---|---|---|---|
| O3.1 | The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises. | The only observable generation of dust observed came from a loader travelling along an unsealed internal road. No water cart was in operation for dust suppression.<br>It is understood that during harvest season, a much higher traffic volume will use this road but that water carts are used to suppress dust.<br>Vital Bon-Matt HR, a concentrated liquid emulsion is used on unsealed roads to prevent dust generation.<br>There remains potential for excessive dust to be generated from this road. It is recommended that one or more of the following be implemented:<br>• dust suppression compound be applied to the road<br>• road surface is re-sheeted with a low fines content capping layer (e.g. gravel, CTB) Evidence:<br>• EI-34 – Vital Bon-Matt HR Product Data Sheet<br>• EI-35 – Vital Bon-Matt HR Safety Data Sheet<br>• Photo 24: Access track to bulk grain storage - note dust generation<br>The use of a dust suppressant chemical to suppress the dust, the chemical we are we going to use is Vital Bon Matt chemical or something similar. | **No** |
| O3.2 | All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust<br>the chemical we are we going to use is ??? | See above **No** from the premises.<br>The use of a dust suppressant chemical to suppress the dust, | |
| **O4** | **Processes and management** | | |
| O4.1 | A Stormwater Management Scheme must be prepared for the development and must be implemented. Implementation of the Stormwater Management Scheme prepared as part of the Soil and Y<br>Scheme must mitigate the impacts of stormwater run-off from and within the premises following the completion of construction Water Management Plan in August 2023 | | |

| Condition No. | Condition | Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|---|
| | activities. The Scheme should be consistent with guidance contained in Managing Urban Stormwater: Council Handbook Evidence item #14, Page 36 – Soil and Water Management Plan (available from the EPA). | | | |
| O4.2 | All storage tanks that require venting must be connected to an emission control device. | | No changes to tank configuration since 2020 audit | Y |

| | | | |
|---|---|---|---|
| **5** | **Monitoring and Recording Conditions** | | |
| **M1** | **Monitoring records** | | |
| M1.1 | The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition. | | |
| M1.2 | All records required to be kept by this licence must be:<br>a) in a legible form, or in a form that can readily be reduced to a legible form;<br>b) kept for at least 4 years after the monitoring or event to which they relate took place; and<br>c) produced in a legible form to any authorised officer of the EPA who asks to see them. | All monitoring records are presented in the Annual Environmental Management Reports 2020, 2021, and 2022.<br>Monitoring data was observed to be available on-site during the 26 October 2023 site inspection.<br>Monitoring records included the required detail. | Y |
| M1.3 | The following records must be kept in respect of any samples required to be collected for the purposes of this licence:<br>a) the date(s) on which the sample was taken;<br>b) the time(s) at which the sample was collected;<br>c) the point at which the sample was taken; and<br>d) the name of the person who collected the sample. | Evidence:<br>• EI-1, EI-2, EI-3– AEMRs 2020, 2021, 2022 | |
| **M2** | **Requirement to monitoring concentration of pollutants discharged** | | |
| M2.1 | For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns: | See following | Y |
| M2.2 | Air monitoring requirements | Reference to Airlabs Environmental's reports dated 5th April, 2022, 10th March 2023 and18th April 2023 revealed that sampling and analysis of Point 2, Point 3 and Point 14 were undertaken appropriate units of measure. All test results complied with the licence limits. | |

| Condition No. | Condition | Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|---|

POINT 2

| Pollutant | Units of measure | Frequency | Sampling Method |
|---|---|---|---|
| Hydrogen Sulfide | milligrams per cubic metre | Every 6 months | TM-5 |
| Moisture | percent | Every 6 months | TM-22 |
| Temperature | degrees Celsius | Every 6 months | TM-2 |
| TRS (as H2S) | milligrams per cubic metre | Continuous | CEM-5 |
| Velocity | metres per second | Every 6 months | TM-2 |
| Volumetric flowrate | cubic metres per second | Every 6 months | TM-2 |

POINT 3

| Pollutant | Units of measure | Frequency | Sampling Method |
|---|---|---|---|
| Hydrogen Sulfide | milligrams per cubic metre | Every 6 months | TM-5 |
| Temperature | degrees Celsius | Every 6 months | TM-2 |
| TRS (as H2S) | milligrams per cubic metre | Continuous | CEM-5 |
| Velocity | metres per second | Every 6 months | TM-2 |
| Volatile organic compounds | milligrams per cubic metre | Every 6 months | TM-34 |
| Volumetric flowrate | cubic metres per second | Every 6 months | TM-2 |

POINT 14

| Pollutant | Units of measure | Frequency | Sampling Method |
|---|---|---|---|
| Hydrogen Sulfide | milligrams per cubic metre | Every 6 months | TM-5 |
| TRS (as H2S) | milligrams per cubic metre | Every 6 months | TM-33 |
| Volatile organic compounds | milligrams per cubic metre | Every 6 months | TM-34 |

**M3** **Testing methods – concentration limits**

| | | | |
|---|---|---|---|
| M3.1 | Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:<br>a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or<br>b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or<br>c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.<br>Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW". | Reference to Airlabs Environmental's reports dated 5th April, 2022, 10th March 2023 and18th April 2023 revealed that sampling and analysis of Point 2, Point 3 and Point 14 were undertaken appropriate units of measures. All test results complied with the licence limits. | Y |

| Condition No. | Condition | Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|---|
| **M4** | **Weather monitoring** | | | |

M4.1

Prior to the commencement of construction of the development, the licensee must establish a permanent meteorological station complying with the Approved methods for sampling and analysis and the Australian Standard AS2923 – 1987, at the facility.

The location of the site chosen for the station and details of equipment, measurement and maintenance/service procedures and schedules to be installed and maintained must be submitted in writing to the EPA and approved in writing by the EPA before any sampling or analysis is carried out. The meteorological monitoring station must be calibrated at least once every 12 months. The EPA is to be provided with the data on request in a Microsoft ® Office software compatible format.

The meteorological station must monitor the following parameters:

| Parameter | Units of measure | Averaging period | Frequency | Sampling method • |
|---|---|---|---|---|
| Rainfall | mm/hr | 1 hour | Continuous | AM-4 |
| Sigma Theta @ 10 m | 0 | 1 hour | Continuous | AM-2 |
| Siting | - | - | - | AM-1 |
| Temperature @ 10 m | K | 1 hour | Continuous | AM-4 |
| Temperature @ 2 m | K | 1 hour | Continuous | AM-4 |
| Total Solar Radiation @ 10 m | W/m2 | 1 hour | continuous | AM-4 |
| Wind Direction @ 10 m | o | 1 hour | Continuous | AM-2 |
| Wind Speed 10 m | m/s | 1 hour | Continuous | AM-2 |

Note: NSW EPA 2001, Approved Methods for the Sampling and Analysis of Air Pollutants in NSW.

The weather station was visually confirmed to be on site and a feed from the station was sighted.

Evidence: Y

- EI-17 – met station calibration record
- Photo 63: Weather station

**M5** **Recording and pollution complaints**

M5.1

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.

Environment office advised no complaints have been received in the last 3 years Y

| | | |
|---|---|---|
| M5.2 | The record must include details of the following:<br>a) the date and time of the complaint;<br>the method by which the complaint was made;<br>provided by the complainant or, if no such details were<br>provided, a note to that effect;<br>d) the nature of the complaint; | An incident register is maintained with all procedure followed. b)<br>Evidence: Y c) any personal details of the complainant which were<br>• EI-10– incident complaint register |

| Condition No. | Condition Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|
| | e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and<br>f) if no action was taken by the licensee, the reasons why no action was taken. | | |
| M5.3 | record of a complaint must be kept for at least 4 years after complaint was made. | No complaints recorded in last 3 years. Prior complaints have been The documented in prior audit | Y |
| M5.4 | The record must be reproduced to any authorised officer of the EPA who ask to see them. | No such request has been made; however this data is available. | Y |
| **M6** | **Telephone complaints line** | | |
| M6.1 | 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 | The incident register identifies mode of communication is phone call. | Y |
| M6.2 | The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint. | The site telephone number is listed on the company web page and is easily found with a search engine. There is not a “complaints line” as such however a general number and contact details is considered to be sufficient | Y |
| M6.3 | The preceding two conditions do not apply until 3 months after: the date of the issue of this licence. | N/A | - |
| **6** | **Reporting Conditions** | | |
| **R1** | **Annual return documents** | | |

| | | | |
|---|---|---|---|
| R1.1 | The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:<br>1 a Statement of Compliance,<br>2 a Monitoring and Complaints Summary,<br>3 a Statement of Compliance - Licence Conditions,<br>4 a Statement of Compliance - Load based Fee,<br>5 a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,<br>6 a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7 a Statement of Compliance - Environmental Management Systems and Practices.<br>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA. | Annual return is compliant as per the Annual Environmental Management Reports for 2020, 2021, and 2022.<br>Evidence:<br>• EI-18, EI-19, EI-20, EI-21– Annual returns for calendar years 2019-2020, 2020-2021, 2021-2022, 2022-2023 | Y |
| R1.2 | An Annual Return must be prepared in respect of each reporting period, except as provided below. | Evidence:<br>• EI-18, EI-19, EI-20, EI-21– Annual returns for calendar years 2019-2020, 2020-2021, 2021-2022, 2022-2023 | Y |
| R1.3 | Where this licence is transferred from the licensee to a new licensee: | N/A | - |

| Condition No. | Condition | Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|---|
| | 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<br>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. | | | |
| R1.4 | Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:<br>when notice in writing of approval of the surrender is given; or<br>b) in relation to the revocation of the licence - the date from which notice revoking the licence operates. | | N/A - a) in relation to the surrender of a licence - the date | |
| R1.5 | 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'). | | Lodgement record for annual returns were provided and were in accordance with requirement.<br>Evidence:<br>• EI-18, EI-19, EI-20, EI-21 – Annual returns for calendar years 2019-2020, 2020-2021, 2021-2022, 2022-2023 | Y |

| | | | |
|---|---|---|---|
| R1.6 | The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA | All annual returns are available. Verified records on site.<br>Evidence<br>• EI-18, EI-19, EI-20, EI-21– Annual returns for calendar years 2019-2020, 2020-2021, 2021-2022, 2022-2023 | Y |
| R1.7 | Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:<br>the licence holder; or<br>b) by a person approved in writing by the EPA to sign on behalf of the licence holder.<br>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until the end of the reporting period.<br>Note: An application to transfer a licence must be made in the approved form for this purpose. | Annual return submitted correctly a)<br>Evidence:<br>• Evidence EI-18, EI-19, EI-20, EI-21– Annual returns for calendar years 2019-2020, 2020-2021, 2021-2022, 2022-2023 after | |
| **R2** | **Notification of environmental harm** | | |
| R2.1 | Notifications must be made by telephoning the Environment Line service on 131 555. | No complaints have been recorded since 2020 within the term of this audit period.<br>Evidence:<br>• EI-10– incident complaints register | Y |
| R2.2 | The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. | The Riverina Oils Environmental Incidents Register records show the two (2) noise complaints and four (4) odour complaints from 2020. No | Y |

| Condition No. | Condition | Evidence | Finding | Compliance (Yes/No) |
|---|---|---|---|---|
| | Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act. | | complaints have been recorded since 2020 within the term of this audit period.<br>Evidence:<br>• EI-10– incident complaints register | |
| **R3** | **Written report** | | | |

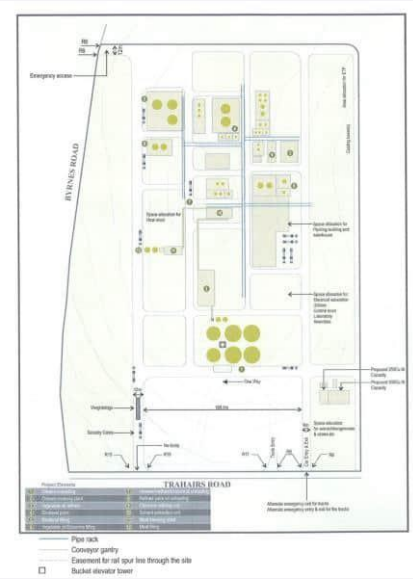
| | | | | |
|---|---|---|---|---|
| R3.1 | Where an authorised officer of the EPA suspects on reasonable grounds that:<br>a) where this licence applies to premises, an event has occurred at the premises; or<br>b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out No such request received 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 office may request a written report of the event. | | | Y |
| R3.2 | The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request | n/a – no applicable events within the period | | N/A |
| R3.3 | The request may require a report which includes any or all of the following information:<br>a) the cause, time and duration of the event;<br>b) the type, volume and concentration of every pollutant discharged as a result of the event;<br>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;<br>d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) n/a – no applicable events within the period who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;<br>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;<br>f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and<br>g) any other relevant matters. | | | N/A |
| R3.4 | The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request. | n/a – no applicable events within the period | | N/A |
| **7** | **General Conditions** | | | |
| **G1** | **Copy of licence kept at the premises or plant** | | | |
| G1.1 | A copy of this licence must be kept at the premises to which the licence applies. | | Copy of authority viewed on-site.<br>Evidence: | Y |
| **Condition No.** | **Condition** | **Evidence** | **Finding** | **Compliance (Yes/No)** |
| | | | • Photo 71: Copy of current approval present on-site | |

| | | | |
|---|---|---|---|
| G1.2 | The licence must be produced to any authorised officer of the EPA who asks to see it. | Copy is available should a request be made | Y |
| G1.3 | The licence must be available for inspection by any employee or agent of the licensee working at the premises. | Copy is available should a request be made | Y |
| **8** | **Pollution Studies and Reduction Programs** | | |
| **U1** | **Management of Spent Earth Waste Material** | | N/A |
| U1.1 | The licensee must prepare a risk management plan for the handling and storage of the spent earth waste material and submit a draft copy to the EPA for approval by no later than 30 April 2020. The risk management plan must be submitted to the EPA's Manager Regional Operations Riverina Far West by email to riverina.farwest@epa.nsw.go.au. | EPL Variation Notice No: 1605732, Remove Condition U1, U1.2, U1.3 and U1.4 | N/A |
| U1.2 | By 10 May 2020 the licensee must implement appropriate controls to minimise the potential fire hazards associated with the storage of the spent earth waste material. This must include the removal of tyres used in bunding around the spent earth waste material. | | N/A |
| U1.3 | By 30 November 2020 the licensee must ensure the spent earth waste material stockpiled at the premises is taken to a facility that can lawfully accept and process or dispose of it. | | N/A |
| U1.4 | At the completion of U1.3 the licensee must provide written confirmation to the EPA's Manager Regional Operations Riverina Far West by email to riverina.farwest@epa.nsw.gov.au providing an update on the status of the pollution reduction program issued under condition U1 on the licence | | N/A |
| **9** | **Special Conditions** | | |
| **E1** | **Storage of Spent Earth Waste Material** | | N/A |
| E1.1 | Spent earth waste material located at the premises must be stored on an impermeable pad which drains to the controlled drainage area on site. | EPL Variation Notice No: 1605732, Remove Condition E1 and E1.4 | N/A |

## 2.2 Schedule 2 – Administrative Conditions

| Number | Condition | Finding | Compliance (Yes / No / Partial) |
|---|---|---|---|
| **Obligation to minimise harm to the environment** | | | |

| | | | |
|---|---|---|---|
| 1 | criteria established under this approval, the Applicant must implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction and/or | It is noted that the requirement is subjective in nature. However, the site was inspected, and the inspection included all major work areas including (but not limited to):<br>• water management system<br>• spent earth recycling, In addition to meeting the specific performance<br>• seed meal storage and handling<br>• solvent extraction operation of the development. chemical storage<br>•<br>• crushing and milling<br>• product storage<br>No evidence of environmental harm from the facility external to the site boundary was observed during the inspection | Y |
| **Terms of approval** | | | |
| 2 | The Applicant must carry out the development generally in accordance with the: | It is noted that the requirement is broad and non-specific in nature. However, the site was inspected and the inspection included all major work areas as described previously. It is the opinion of the auditor that the works are carried out "generally in accordance with" the provisions listed here in with the following exception:<br>The "revised site plan" as approved does not include the "seed bunker" located north of the processing area.<br>An amendment of the approval is recommended to ensure the "revised site plan" is consistent with the actual site plan.<br>Robe has started Consent Modification MOD7 to have the bunkers classified as storage facility. This Modification of ROBEs consent will be applied for in June 2024. | **No** |
| (a) | EA | | |
| (b) | Revised site plans | | |
| (c) | Response to submissions | | |
| (d) | Revised statement of commitments; | | |
| (e) | Modification Application 07_0146 MOD 1 and supporting documentation titled *Riverina Oils and Bioenergy, Integrated Oilseed Processing Plant*, Environmental Assessment, August 2010, prepared by Lennon Salvestro Planning, and 299 Trahairs Road, Wagga Wagga, Response to Submissions – 07_0146 Mod 1, Integrated Oilseed Processing Plant, January 2011, prepared by RPS; and | | |
| (f) | Modification Application 07_0146 MOD 2 and supporting documentation titled Riverina Oils and BioEnergy, Section 75W Modification Environmental Assessment; | | |
| (g) | Modification Application 07_0146 MOD 4 and supporting documentation titled *Riverina Oils – Blending tank project application* prepared by Riverina Oils and dated 19 July 2019; | | |

| Number | Condition | Finding | Compliance (Yes / No / Partial) |
|---|---|---|---|
| (h) | Modification Application 07_0146 MOD 6 and supporting documents titled 'MOD 6 Production Limits Amendments Modification Report Riverina Oils and Bio Energy<br>Pty Ltd' prepared by GHD Pty Ltd dated 3 May 2023; and |  | |
| (i) | conditions of this consent. | | |
| 3 | If there is any inconsistency between the above, the conditions of this approval | - NA must prevail to the extent of any inconsistency. | |
| 4 | The Applicant must comply with any reasonable requirement/s of the Secretary Department's assessment of: Department of Planning in the preceding period requiring the planting of screening trees and use of blue tarpaulins to | No such requests have been raised in the three years prior to audit. It is noted that two requests were raised by the arising from the cover seed. | |
| (a) | any reports, plans, strategies, programs or correspondence that are submitted in accordance with this approval; and | It was confirmed that both the screening trees remain in place as does the practice of using blue tarpaulins. | Y Evidence: |

| | | | |
|---|---|---|---|
| (b) | the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence. | • Photo 28: Blue grain cover tarpaulin<br>• Photo 25: Byrnes Road emergency access point | |
| 5 | Prior to each of the events listed below, or within such period otherwise agreed by the Secretary, the Applicant must certify in writing to the satisfaction of the Secretary, that it has complied with all conditions of this consent applicable prior to that event: | Relates to events prior to the audit period | NA |

| Number | Condition | Finding | Compliance (Yes / No / Partial) |
|---|---|---|---|
| (a) | commencement of any physical works associated with the development; and | | |
| (b) | commencement of operations. | | |
| 6 | The Applicant must not; process more than 200,000 tonnes per year of oil seed. | Modification Application 07_0146-Mod-6 approved on 15 September 2023 has modified the production limits from 200,000 tonnes of oilseed per year to 165,000 tonnes of oilseed per year. The production limit of 81,500 for refined vegetable oil is also removed.<br>Evidence:<br>• EI-22– MP07_0146-Mod-6 Y<br>The AEMRs for 2020, 2021, and 2022 were issued prior to Modification Application 07_0146-Mod-6. AEMRs 2021 and 2022 show that production levels for refined vegetable oil exceeded the allowed 81,500 tonnes per year threshold and were not compliant of the condition. Hence a modification<br>• EI-1, EI-2, EI-3– AERMs 2020, 2021, 2022 | |
| 7 | The Applicant must not store more than 27,000 tonnes of oilseed, more than 3,000 tonnes of vegetable protein meal, and more than 3,232 kilolitres of vegetable oil on site at any one time. | Bunker storage for 2022 does not exceed 27,000 tonnes<br>Evidence:<br>• EI-37 - Bunker stocks | ?? |
| **Management Plans/Monitoring Programs** | | | |
| 9 | With the approval of the Secretary, the Applicant may submit any management plan or monitoring program required by this approval on a progressive basis. | - | NA |

| | | | |
|---|---|---|---|
| **Structural adequacy** | | | |
| 10 | The Applicant must ensure that all new buildings and structures on the site are constructed in accordance with the relevant requirements of the BCA.<br>Notes: Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. | Verified by previous audits | NA |
| **Protection of public infrastructure** | | | |
| 11 | Prior to commencement of construction, the Applicant must: | | |
| (a) | prepare a dilapidation report of the public infrastructure in the vicinity of the site (including roads, gutters, footpaths) in consultation with Council; and | Verified by previous audits | NA |
| (b) | submit a copy of this report to the Secretary. | | |
| 12 | The Applicant must | Verified by previous audits | NA |
| **Number** | **Condition** | **Finding** | **Compliance (Yes / No / Partial)** |
| (a) | repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and | | |
| (b) | relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. | | |
| **Operation of plant and equipment** | | | |
| 13 | The Applicant must ensure that all plant and equipment used on the site is operated in an efficient manner, and in accordance with relevant or maintenance Australian Standards | While an exhaustive review of equipment maintenance has not been undertaken as part of this audit, sufficient records maintained and and operation were observed to indicate that the operation is generally in compliance with this provision. Y<br>Any exceptions are noted as required within this audit report. | |

## 2.3 Schedule 3 – Specific Environmental Conditions

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| **SOIL AND WATER** | | | |
| **Discharge Limits** | | | |
| 15 | Prior to the commencement of the modified operations (under MP 07_0146 MOD 2) the Applicant must pay a contribution of 1% of the additional cost of carrying out the modified development in accordance with the City of Wagga Wagga Section 94A Levy Contributions Plan 2006.<br>Notes: This contribution is subject to indexation to reflect quarterly variations in the Consumer Price Index All Group Index Number for Sydney, as published by the Australian Bureau of Statistics. | Verified by previous audits | NA |
| **Design Criteria for Storage Areas** | | | |
| 16 | The Applicant must ensure that the:<br>a) Wastewater storage pond has:<br>• Meets the requirements of the DPI and EPA;<br>• Has a compacted clay or modified soil layer of at least 900 millimetres thick with an in-site coefficient of permeability of less than $1x10^{-9}$ m/s, unless otherwise agreed to by the EPA; and<br>• Incorporates a leakage detection system. | Wastewater pond was inspected during the site visit. No modifications to the pond were visible at the time of inspection. Construction requirements have been verified in previous audits.<br>Evidence:<br>• Photo 41: Wastewater storage pond<br>• Photo 42: Wastewater storage pond<br>• Photo 43: Wastewater storage pond overflow | Y |
| 16a | The Applicant must ensure that all solid waste storage areas that have implemented pads, and are located in controlled drainage areas on the site. | Solid waste storage areas were inspected across the site. No potentially contaminating materials were observed to be in location where they were at risk of leaving the site boundary.<br>Evidence:<br>• Photo 26: General waste skip<br>• Photo 45: Spent bleaching earth<br>• Photo 46: Spent bleached earth skip<br>• Photo 49: Spent bleached earth skip | Y |

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| 16b | The Applicant must undertake all monitoring of any discharge point or utilisation area in accordance with the EPL. | Monitoring data was viewed on-site and various reports provided for review. Monitoring would appear to be in accordance with the requirements of the EPL:<br>Evidence:<br>• EI-4, EI-5, EI-6, EI-7, EI-8, EI-9– air emissions reports<br>• Photo 50: Emission monitoring point #2<br>• Photo 52: CEMS Analyser output<br>• Photo 53: Emissions monitoring point #14 | Y |
| **Wastewater irrigation** | | | |
| 17 | The Applicant must ensure that:<br>a) no runoff or spray from the wastewater irrigation goes beyond the boundary of the site;<br>b) the volume of wastewater directed to the irrigation area does not exceed the capacity of the area to assimilate wastewater or cause groundwater pollution;<br>c) the irrigation area is at least 40m away from any channels and 250m from any domestic groundwater well;<br>d) the irrigation system is only used for secondary-treated effluent complying with the effluent-quality requirements of Part 4, Appendix 4.2A, 4.2A10.6 of AS1574:200<br>e) the proper drainage system must be incorporated with the land application system design as appropriate to ensure surface run-off does not entre into the system. | The irrigation area was inspected. No evidence of overspray was observed.<br>Evidence:<br>• Photo 20: Treated sewage effluent irrigation area | Y |
| **Bunding** | | | |

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|---|---|---|---|
| 18 | The Applicant must store all chemicals, fuels and oils used on site in appropriately bunded e areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. These bunds must be designed and installed in accordance with the requirements of all relevant Australin Standards, and/or DEC's Environmental Protection Manual *Technical Bulleting Bunding and Spill Management*. | Evid • • • • ıg was inspected across the entire site. Bunds were generally free of debris and visually appeared to have ɜnt capacity.<br>ıat detailed measurements were not completed for all bunding.<br>ıce:<br>Photo 6: Caustic and Acid store<br>Photo 7: Bulk caustic storage<br>Photo 9: Bulk chemical storage<br>Photo 23: Chemical small volume storage<br>Photo 57: Bulk storage and bunding | Y |

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| 18A | The Applicant must ensure the tanks approved under Modification Application 07_0146 MOD 4 are sub-bunded separately from the existing tank farm with the bund retention capacity being for the largest single stored volume within the sub-bund. Adequate fire water cooling using Separation of different chemicals in bunded was observed to be in place. See above Y hydrants and hoses must be provided to the new tanks to minimise the potential for incident escalation. | | |
| Soil and Water Management Plan | | | |
| 19 | The Applicant must prepare and implement a Soil and Water Management Plan for the development to the satisfaction for the Secretary. This plan must:<br>a) be submitted to the Secretary for approval prior to construction;<br>b) be prepared by a suitably qualified and experienced expert in consultation with EPA,<br>DPI and Council;<br>c) include:<br>• a Stormwater Management Scheme and monitoring program;<br>• a Wastewater and Irrigation Management Plan and monitoring program; and<br>• Groundwater Management Plan and monitoring program. | A Stormwater Management Scheme, Wastewater and Irrigation Management Plan and a Groundwater Management Plan were developed and discussed in Soil and Water Management Plan - 16 August 2023<br>Evidence:<br>• EI-15 – Soil and Water Management Plan | Y |

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|---|---|---|---|
| 20 | The Stormwater Management Scheme must:<br>a) Be prepared by a suitably qualified and experienced expert in consultation with Handbook.PDF (nsw.gov.au) Council;<br>b) Be consistent with the guidance in the latest version of *Managing Urban Stormwater: Council Handbook;*<br>c) Mitigate the impacts of stormwater run-off from and within the site; and<br>plans of the stormwater system; and<br>e) Ensure the peak stormwater discharge from the development site does not exceed peak discharge of the pre-development site. | There have been no changes to stormwater management since the previous audit. It was noted that the stormwater pond requires de-silting and that this is intended to occur in the coming months.<br>Evidence:<br>• Photo 34: Bulk grain store and grain silo d) Include detailed<br>• Photo 36: Stormwater Dam | Y |

| Number Condition | Finding | Compliance (Yes/No) |
|---|---|---|

| | | | |
|---|---|---|---|
| 21 | a) Irrigation Management Plan must:<br>Be consiste *Environmental Guidelines: Use of Effluent by Irrigation* and<br>an Guideline for Water Recycling: Managing Health and Environmental -<br>b) Risks (phas 2006*;*<br>d by a suitably qualified and experienced expert in consultation with Council<br>c) ealth;<br>e that the Applicant has been granted a Network Operator's Licence *Water*<br>d) under the *ndustry Competition Act 2006*;<br>design and management of the irrigation system, and crop system, easures<br>including m to minimise soil degradation and nutrient and salt accumulation;<br>e) and<br>Include<br>• The wastewater and soil quality impact assessment criteria and the effluent treatment and irrigation system performance measures;<br>• Details of the wastewater management for the development;<br>• Detail the wastewater monitoring program;<br>• Procedures for reporting the monitoring results against the criteria;<br>• Contingency measures to address exceedances, pollutant triggers and problems with the wastewater management systems; and<br>• A description of how the effectiveness of actions and measures would be monitored over time. | Use of effluent by irrigation (nsw.gov.au)<br>The wastewater irrigation area was inspected. No evidence of practices deviation from requirements was observed.<br>Evidence:<br>• EI-15– Page 23 – Soil and water management plan<br>• Photo 20: Treated sewage effluent irrigation area | Y |

| Number Condition | Finding | Compliance (Yes/No) |
|---|---|---|

| | | | |
|---|---|---|---|
| 22 | The ndwater Ma must:<br>a) d by a suitably qualified expert in consultation with DPI;<br>b) ed to the Secretary for approval within three months of development otherwise agreed by the Secretary;<br>c)<br>Include:<br>• A site water balance, which includes details of water sources and security of water supply, site water use and management, measures to minimise water use and maximise reuse of contaminated water;<br>• Details of the on and off-site groundwater monitoring program that includes baseline data of groundwater quality, levels and flow prior to the commencement of construction<br>• Groundwater impact assessment criteria, including nutrient, salt and groundwater levels that would trigger an investigation and/or application of specified contingency measures;<br>• Identified all activities that could impact groundwater quality;<br>• Identify management measures to ensure compliance with groundwater impact assessment criteria<br>• A groundwater response plan which describes the measures and/or procedures that would be implemented to respond to any leakages from the evaporation pond, exceedance of ground water assessment criteria, notification to DPI within 48 hrs of detection of an exceedance; and<br>• A surface water response plan which describes the measures and/or procedures that would be implemented to respond to potential flooding and/or loss of contaminated water from the evaporative pond. | Note – part of water plan<br>Groundwater bores remain in place however it is noted that there has been no water present for testing for the last 2 years. Unless practices change, consideration should be given to making an application to remove monitoring requirements from approvals/plans.<br>Evidence:<br>Photo 21: Groundwater bores adjacent to treated sewage irrigation area<br>Photo 22: Groundwater bores adjacent to treated sewage irrigation area | Y |
| 22a | In the event that the groundwater monitoring referred to in Condition 22 above identifies an exceedance, the Applicant must outline the measures to remediate the issue and prevent future incidents occurring. These measures must be determined in consultation with DPI, and the measures to be implemented and the timing of their implementation must to be to the satisfaction of the Secretary. | No exceedance reported<br>Evidence:<br>• EI-13 – Groundwater monitoring report | N/A |
| 22b | The Applicant must connect to council's sewer infrastructure once it becomes available in the vicinity of the site and disposal of all black water in accordance with a trade waste agreement, unless otherwise agreed to by the Secretary. | No sewerage infrastructure available for connection | N/A |

**NOISE**

**Operating Hours**

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| 23 | The Applicant must comply with the restriction in Table 1, unless otherwise agreed by the Director-General.<br>*Table 1: Construction and Operation Hours for the Project*<br>Activity / Day / Time<br>Construction: Monday – Friday 7:00am to 6:00pm<br>Saturday 8:00am to 1:00pm<br>Sunday and Public Holidays Nil<br>Operation: All days Any time<br>*Note: Construction activities may be conducted outside the hours in Table 1 provided that the activities are not audible at any residence beyond the boundary of the site.* | Note – 24/7 operation | Y |

**Noise Limits**

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| 24 | The Applicant must ensure that the noise from the operation of the development does not exceed the noise limits presented in Table 2<br>*Table 2: Project Noise Limits (dB(A))*<br>Day: 35; Evening ($L_{Aeq\ (15\ minute)}$): 35; Night ($L_{Aeq\ (15\ minute)}$): 35; Night ($L_{A1\ (1\ minute)}$ or $L_{A\ max}$): 45; Location: At any residence or other noise sensitive receiver<br>*Notes:*<br>*a) To determine compliance with the $L_{Aeq\ (15\ minute)}$ noise level limits in the above table, noise from the project is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of a dwelling where the dwelling (rural situations) is more than 30 metres from the boundary. To determine compliance with the $L_{A1\ (1\ minute)}$ noise level limits in the above table, noise from the project is to be measured at 1 metre from the dwelling façade. Where it can be demonstrated that direct measurement of noise from the project is impractical, the DECC may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy).*<br>*The modification factors in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.*<br>*b) The noise emission limits identified in the above table apply under meteorological conditions of:*<br>*o wind speeds of up to 3 m/s at 10 metres above ground level; and*<br>*o temperature inversion conditions of up to 3°C/100m, and wind speeds of up to 2 m/s at 10 metres above ground level.* | No monitoring has been conducted as no complaints have been received in within the audit period | Y |

**Construction Noise Management Plan**

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| 25 | a) The Applicant must prepare and implement a Construction<br>b) Noise Management Plan in consultation with the EPA, outlining measures to manage and minimise construction noise impacts. The Plan must be submitted and approved by the Secretary prior to the commencement of construction and must include:<br>c) Identification of all construction activities that would generate noise and the associated noise levels;<br>d) Details of the length and staging of construction;<br>e) Identification of all potentially affected sensitive receivers<br>f) An assessment of potential construction noise impacts against the noise objectives;<br>g) Monitoring procedures to measure compliance with noise objectives;<br>h) Procedures for implementing noise mitigation treatments and monitoring their effectiveness in meeting the noise objectives;<br>i) Procedures for notifying residents of construction activities that are likely to affect their noise and vibration amenity, and procedures for managing complaints and<br>j) Contingency measures to be implemented in the event of non-compliances with noise objectives. | N/A – not in construction phase | N/A |
| **Operating Conditions** | | | |
| 26 | Applicant must ensure trucks associated with the development are operated at low speed or power and are turned off when not being used. Vehicles are not to be left idling for prolonged periods. | Traffic management plan has vehicles generally moving in one direction and at low speed through the facility. The Numerous vehicles were observed on the site during the inspection and were compliant with this requirement at the time.<br>Evidence:<br>• EI-14– operational traffic management plan | Y |
| **Noise Monitoring** | | | |
| 27 | After the commencement of the modified operations under MP 07 0146 MOD 2 during a period of normal operating conditions, the Applicant must undertake a Noise Compliance Validation Assessment. The noise compliance validation assessment must identify whether the development is complying with the development noise limits specified in Condition 24 | Completed historically. No changes in operations since last audit to justify repeat | Y |

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| 28 | The Applicant must prepare a Noise Compliance Validation Report outlining the findings of the noise compliance validation assessment. The Report must be prepared by a suitably qualified expert and be submitted to the EPA and the Secretary for approval within three months of the commencement of the modified operations under MP 07 0146 MOD 2 operation.<br>a) Monitored noise levels, compared against development noise limits specified in the Condition 24.<br>b) additional measures that would be implemented to ensure compliance, if non-compliances are detected;<br>c) details of how the effectiveness of these measures would be measured and reported to the Secretary; and<br>d) details of any noise related complaints and action taken to respond to these complaints. | No changes since 2020 audit | Y |
| 29 | The Applicant must prepare and implement a Noise Monitoring Plan, in consultation with the EPA. The Plan must be submitted for the approval of the Secretary within three month of the commencement of operation, and must include a noise monitoring protocol to evaluate compliance with development noise limits specified in Condition 24 and management measures to address any exceedances. | No changes since 2020 audit.<br>No monitoring has been required since 2020 as no complaints have been received.<br>Evidence:<br>• EI-23– noise monitoring plan | Y |
| **ODOUR** | | | |
| 30 | The Applicant must not cause or permit the emission of offensive odours from the site, as defined under Section 129 of the *Protection of the Environment Operations Act 1997.*<br>Note: Section 129 of the Protection of the Environment Operation 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 at minimising odour. | No excessive odour was noted during the inspection.<br>Monitoring of emission has been completed regularly by Airlabs. While some monitoring events have not been completed strictly in accordance with the requirements of the approvals due to Covid restrictions, monitoring was appropriate given the circumstances.<br>Evidence:<br>• EI-4, EI-5, EI-6, EI-7, EI-8, EI-9 – Air emissions reports | Y |
| **Odour Management Plan** | | | |

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| 31 | The Applicant must prepare and implement an Odour Management Plan, in consultation with the EPA, outlining measures to minimise odour impacts associated with the operation of the development.<br>The Odour Management Plan must be submitted and approved by the Secretary prior to commencement of operation, and must include:<br>a) all point and diffuse sources of odour associated with the operation;<br>b) best practice odour mitigation and management practices to be implemented to ensure offensive odour impacts do not occur<br>c) a program to monitor the odour impacts, and the effectiveness of the odour mitigation and management practices, associated with the operation of the development;<br>d) details of proposed contingency measures should odour impacts occur;<br>e) details of the proposed maintenance procedures to ensure potential odour impacts are managed; and<br>f) details of an odour complaints system that will be implemented to record, investigate, report and action any odour complaints received. | No changes or odour management plan during the audit period.<br>Evidence: off-site;<br>• EI-24 – Odour management plan | Y |
| 32 | When directed by the EPA, the Applicant must commission a comprehensive odour audit of the fully operational facility to confirm compliance with Section 129 of the Protection of the Environment Operations Act 1997.<br>The comprehensive odour audit must be prepared by a recognised odour control specialist to quantify the odour abatement efficiency of the odour controls and the odour emission rate of the discharge to atmosphere and confirm compliance with odour assessment specifications and assumptions.<br>The recognised odour control specialist must also conduct a review of development operations against each of the mitigation measures and management practices described in the Odour Management Plan and the documents submitted in the support of the development, as modified.<br>The scope and timing of the dour control specialist's audit report and review must be the satisfaction of the EPA. | No such direction during the audit period. | N/A |

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|---|---|---|---|
| 32a | In the event that the odour audit referred to in Condition 32 above identifies an exceedance, the Applicant must outline measures to remediate the issue and prevent future incidents occurring. The measures to be implemented and the timing of their implementation must be to the satisfaction of the EPA. | No such direction during the audit period. | N/A |
| **AIR** | | | |
| **Air Quality Assessment Criteria** | | | |

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| 33 | The Applicant must ensure that the emissions from discharge points serving the plant do not exceed the air quality impact assessment criteria outlined in the EPL for the development. | The reports issued by Airlabs indicate that emissions were in compliance with emissions criteria.<br>Evidence:<br>• EI-4, EI-5, EI-6, EI-7, EI-8, EI-9 – Air emissions reports | Y |
| **Construction** | | | |
| 34 | During construction, the Applicant must ensure that:<br>a) All trucks entering or leaving the site with loads have their loads covered;<br>b) Trucks associated with the development do not track dirt onto the public road network; and<br>c) The public roads used by these trucks are kept clean. | n/a - now in operational phase | N/A |
| **Operation** | | | |

| | | | |
|---|---|---|---|
| 35 | The Applicant must carry out all reasonable and feasible measures to minimise the dust generated by the construction and operation of the development | The site EMP has measures for dust management including use of a water cart.<br>The most heavily trafficked area of the site is sealed, limiting dust generation.<br>The road to the grain storage areas was not sealed and traffic using this road was observed to be generating dust as no water cart was operating at the time. It is understood that more traffic use this road during the harvest season.<br>Without the use of a water cart, there is a risk that excessive dust may be generated on this access track.<br>The limited amount of dust observed during the inspection was not sufficient to cause off-site nuisance, however there is opportunity for improvement with regard to dust management. It is recommended that either the access to the grain store be sealed or a longer-term dust suppressant be applied so as dust suppression is not reliant on a water cart.<br>Evidence:<br>• Photo 24: Access track to bulk grain storage - note dust generation | Y |
| 36 | All storage tanks that require venting must be connected to an emission control device. | Refer Condition EPL Condition O4.2 | Y |
| **Meteorological Monitoring** | | | |
| 37 | Prior to the commencement of construction, the Applicant must establish a permanent meteorological station on site to the satisfaction of the EPA. This meteorological station must be capable of measuring parameters specified in the EPL | Met station was observed to be in place and data was available on site.<br>Evidence:<br>• EI-17– weather station calibration record<br>• Photo 63: Weather station | Y |
| Emissions Validation Monitoring Program | | | |

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| 38 | After the commencement of the modified operations under MP 07_0146 MOD 2, the Applicant must undertake source emission validation monitoring to demonstrate compliance with:<br>a) Air emission prediction in the EA submitted in support of Modification Application MP 07_0146 MOD 2; and<br>air concentration limits specified in the EPL. | This relates to a period prior to the audit period and has previously been verified. Ongoing monitoring of emissions has continued.<br>Evidence:<br>• EI-4, EI-5, EI-6, EI-7, EI-8, EI-9 – Air emissions reports b) The | Y |

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|---|---|---|---|
| 39 | The Applicant must prepare an emission Validation Monitoring Report outlining the findings of the source emission validation monitoring. The Report must be prepared by a suitably qualified expert and be submitted to the EPA and the Secretary for approval within three months of the commencement of the modified operation. The Report must include:<br>a) Levels of emission measured, compared against air emission predictions in the EA Application 07_0146 MOD 2 and the air concentration limits specified in the EPL;<br>b) Any additional measures that would be implemented to comply with the air concentration limits specified in the EPL. | This relates to a period prior to the audit period and has previously been verified. Ongoing monitoring of emissions has continued. submitted in support of Modification | Y |
| 39a | In the event that the emission validation monitoring referred to in Condition 39 above identifies an exceedance, the Applicant must outline the measures to remediate the issue and prevent future incidents occurring. These measures must be determined in consultation with EPA, and to be to the satisfaction of the Secretary. | This relates to a period prior to the audit period and has previously been verified. Ongoing monitoring of emissions has continued. the measures to be implemented and the timing of their implementation must | Y |
| 40 | The Applicant must undertake air emission monitoring as required in the EPL, to demonstrate that the development meets the air quality impact assessment criteria outlined in the EPL. | The reports issued by Airlabs indicate that emissions were in compliance with requirements.<br>Evidence:<br>• EI-4, EI-5, EI-6, EI-7, EI-8, EI-9 – Air emissions reports | Y |
| 40a | The Applicant must ensure that all storage tanks that require venting are connected to an control device. | Refer item 36 of this table emission | Y |
| **HAZARDS** | | | |
| **Pre-construction Studies** | | | |
| 41 | At least one month prior to construction of Modification Application 07_0146 MOD 4 (except for construction of preliminary works that are outside the scope of the hazard studies), the Applicant must submit for the approval of the Secretary:<br>a) an updated Fire Safety Study prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study Guidelines' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems. | No amendments since 2020 audit | Y |

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| **Pre-commissioning Plans and Systems** | | | |
| 42 | At least two months prior to commissioning of the modified operations under MP 07_0146 MOD 2, the Applicant must prepare and submit the following pre-commissioning studies for the approval of the Secretary:<br>a) an updated Emergency Plan detailing emergency procedures for the modified development, including detailed procedures for the safety of people outside of the development who may be at risk from the development. The updated Emergency Plan must be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1 'Industry Emergency Planning Guidelines'; and<br>b) an updated Safety Management System covering all on-site operations and associated transport activities involving hazardous materials. The updated Safety Management System must be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No.9 'Safety Management' and must specify all safety related procedures, responsibilities and policies, along with mechanisms for ensuring adherence to the procedures. Records must be kept on-site and be available for inspection by the Secretary upon request. | N/A – relates to pre 2020 action | N/A |
| **Pre-operation Compliance Report** | | | |
| 43 | One month prior to the commencement of operation, the Applicant must prepare and submit a report to the Secretary detailing compliance with conditions 45 and 46 including:<br>a) approval dates for the required studies, plans and systems;<br>b) actions taken, or propose to be taken, to implement the recommendations of the studies, plans and systems; and<br>c) responses to any requirements from the Secretary resulting from recommendations of the studies, plans and systems. | N/A – relates to pre 2020 action | N/A |
| **Post-operation Compliance Report** | | | |

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| 44 | Within three months after the commencement of operation, the Applicant must prepare and submit a report to the Secretary verifying that:<br>a) the Emergency Plan is effectively in place and at least one emergency exercise has been conducted; and<br>b) the Safety Management System has been fully implemented and that the records required by the system are being kept. | N/A – relates to pre 2020 action | N/A |
| **TRANSPORT** | | | |
| **Traffic Management Plan** | | | |

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| 45 | The Applicant must prepare and implement a Traffic Management Plan for the development, in consultation with Council. The Plan must be submitted to the Secretary prior to the commencement of construction and must:<br>a) describe the traffic volumes and movements to occur during construction and operation;<br>b) detail the proposed measures to minimise the impact of construction and operation traffic on surrounding road network, including route selection, driver behaviour and vehicle maintenance; and<br>c) detail the procedures to be implemented in the event of a complaint from the public regarding construction and operation traffic. | No changes to TMP during audit period Evidence:<br>• EI-14– operational traffic management plan | Y |
| **Road Network and Parking** | | | |
| 46 | The Applicant must ensure that all vehicles enter and depart the site in forward direction and that the internal road network and parking associated with the development are designed, constructed and maintained in accordance with the latest versions of the Australian Standards AS 2890.1:2004, AS 2890.2:2002 and AUSTROADS. | Signage was clearly visible detailing correct traffic movement direction. To the greatest extent possible reversing was minimised.<br>Road were all observed to be in a serviceable condition. | Y |

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|---|---|---|---|
| 46a | The Applicant must ensure that the emergency access to Byrnes Road is<br>a) accessed by emergency vehicles only;<br>b) appropriately signposted; and<br>c) located so as to comply with the required Safe Intersection Sight Distance (SISD) in either direction in accordance with the RTA's Road Design Guide and/irrelevant Australian Standards for the prevailing speed limit (currently100Km/H). Compliance with this requirement is to be certified by an appropriately qualified person prior to construction of the vehicular access. | The emergency access at Byrnes road was inspected and found to be overgrown and requiring maintenance.<br>While this has been noted as a non-conformance at the time of audit, it is noted that this was corrected on the same day as the observation was made and the site is now compliant.<br>Evidence:<br>• Photo 25: Byrnes Road emergency access point | **No**<br>Has since been rectified |
| 47 | The Applicant must ensure that Trahairs Road between the site entrance and Byrnes Road, including the intersection with Byrnes Road, is upgraded to the satisfaction of Council and the RTA prior to the commencement of operation, at full cost to the Applicant. | N/A – relates to pre 2020 action. No changes to access arrangements during audit period | Y |
| 48 | The Applicant must ensure that all parking generated by the development is accommodated on site. No vehicles associated with the development must park on the public road system at any stage. | There was more than sufficient parking available on-site to minimise the risk of off-site queueing | Y |
| 49 | All construction vehicles must access the site from Trahairs Road. | N/A – relates to construction phase | N/A |

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|

| | | | |
|---|---|---|---|
| 49a | The Applicant must ensure that:<br>a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2.<br>b) the swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AS 2890.2-2002 "Offstreet commercial vehicle facilities" and to Councils satisfaction and in a manner to allow all vehicles to be able to enter and exit the subject site in a forward direction;<br>c) the development does not result in any vehicles queuing on the public road network;<br>d) heavy vehicles and bins associated with the development do not park or stand on local roads or footpaths in the vicinity of the site;<br>e) all vehicles are wholly contained on site before being required to stop; all<br>f) loading and unloading of materials is carried out on site;<br>g) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times;<br>h) any driveway is sealed from the edge of seal of the carriageway to the entry gate or the property boundary whichever is the greater. The remainder of the driveway access should be constructed using an all-weather surface to address maintenance and dust concerns;<br>i) any access driveway is designed and constructed to minimise water from proceeding onto the carriageway of the adjoining road reserve; and<br>j) appropriate directional signage and line marking is to be strategically located and maintained throughout the site to assist in directing vehicles around and through the facility. | No audits of traffic movement have been conducted recently. During the inspection, only limited vehicles were present on site and it was observed that preparations were being made for the upcoming harvest season.<br>No changes to traffic management arrangements were noted since the 2020 Audit | Y |
| 50 | The Applicant must implement a training and awareness program incorporating a driver code of conduct for vehicles travelling to, from and within the site during operation. The training program must cover speed limits within the site, restrictions on vehicle idling and queuing on local roads | The auditor was required to undertake the contractors induction prior to coming onto site. This material was present within the induction. | Y |
| **Vehicle Queuing** | | | |

| | | | |
|---|---|---|---|
| 51 | During the development, the Applicant must ensure that the development does not result in vehicles queuing on the public road network. | Adequate parking was observed on-site. No evidence of queueing on the public road network was observed. any | Y |
| **VISUAL** | | | |

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| **Lighting** | | | |
| 52 | The Applicant must ensure that the lighting associated with the development:<br>a) complies with the latest version of Australian Standards AS 4282(INT) – Control of Obtrusive Effects of Outdoor Lighting; and<br>b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network. | Note that the site inspection component of the audit was completed during daylight hours. All lighting appeared to be appropriate for the site and the absence of complaints indicates no significant nuisance effects from the operation | y |
| **Landscape** | | | |
| 53 | The Applicant must prepare and implement a detailed Landscape Plan for the site. The Plan must:<br>a) be prepared in consultation with Council and submitted to the Secretary for approval prior to commencement of construction;<br>b) include details of screening trees to be planted along the boundary of the site;<br>c) use predominantly endemic species;<br>d) where practicable, provide for the early planting of advanced plants along the boundary of the site to minimise the visual impacts of the development include a program for implementation; and<br>e) provide for the maintenance of landscaping on site<br>f) | Site was visually in good condition with basic landscaping and screening planning in place Evidence:<br>• EI-25 – Landscape management plan | Y |
| **WASTE** | | | |
| **Operating Conditions** | | | |

| Number | Condition | Finding | Compliance (Yes/No) |
|---|---|---|---|
| 54 | The Applicant must ensure that all waste generated on the site during construction and e operation of the development is classified in accordance with the EPA Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes • and disposed of to a facility that may lawfully accept the waste. • | storage areas were inspected.<br>patible wastes were segregated.<br>ic wastes were observed to have specific management practice (e.g. bleached earth, waste water, genera<br>new waste classification guidelines, *Waste Classification Guideline. Part 1: Classifying Waste* have been since approval, which supersede the previous guidelines.<br>Evid ice:<br>• EI-16 – waste management plan<br>• Photo 26: General waste skip<br>• Photo 27: General waste skip contents<br>• Photo 29: Waste soil stockpile<br>• Photo 45: Spent bleaching earth<br>• Photo 46: Spent bleached earth skip<br>• Photo 48: Meal warehouse | Y |
| 55 | Except as expressly permitted by an EPL, the Applicant must not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal, or any waste generated at the site to be disposed of at the site. | No evidence of waste generated external to the site was observed during the inspection | Y |

**Waste Management Plan**

| Number | Condition | Finding | Compliance (Yes/No) |
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| 56e | The Applicant must prepare and implement a Waste Management Plan in consultation with EPA and Council. The plan must be submitted and approved by the Director-General prior to the commencement of construction and must: identify the types and quantities of waste that would be generated during construction and operation, and the standards and performance measures for dealing with this waste;<br>a) Detail procedures to monitor the amount waste generated by the development;<br>b) outline measures to minimise the production and impact of all wastes generated by the development, including details of how this waste would be reused, recycled, and if necessary, appropriately treated and disposed of in accordance with the EPA's guidelines on the Assessment, Classification & Management of Liquid and Non-Liquid Waste;<br>c) describe how the effectiveness of these actions and measures would be monitored over time;<br>d) describe what procedures would be followed to ensure compliance if any non-compliance is detected; and<br>e) detail the contingency measures that would be implemented should the production of vegetable protein meal exceed offsite demand. | N/A – relates to pre 2020 action<br>Note: new waste classification guidelines, *Waste Classification Guideline. Part 1: Classifying Waste* issued since approval, which supersede the previous guidelines.<br>Evidence:<br>• EI-16– waste management plan | N/A |
| **ENERGY EFFICIENCY** | | | |
| 57 | The Applicant must prepare and implement an Energy Savings Action Plan for the development to the satisfaction of the Secretary. This plan must be prepared in accordance with the Guidelines for Energy Savings Action Plans, DEUS 2005, and be submitted to the Secretary for approval prior to the commencement of operations on site. | N/A – relates to pre 2020 action | N/A |
| **Procurement of Feedstock** | | | |
| 58 | The Applicant must implement a Procurement Plan for the development, to the satisfaction of the Secretary. The plan must be submitted prior to commencement of operation and must:<br>a) identify environmentally and socially responsible feedstock materials;<br>include procedures for the sourcing of such feedstock materials;<br>c) include evidence of legal sourcing of feedstock; and<br>d) contain procedures for regular review of suppliers. | N/A – relates to pre 2020 action b) | N/A |

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| 59 | The Applicant must provide evidence on an annual basis, to the satisfaction of the Secretary, demonstrate compliance with condition 64. | Refers to this audit to | Y |

## 2.4 Schedule 4 – Environmental Management and Monitoring

| Number | Condition | Finding | Compliance (Y/N) |
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| **Environmental Management Strategy** | | | |
| 60 | The Applicant must prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must be submitted to the Secretary prior to carrying out any development on site, and:<br>a) provide the strategic context for environmental management of the development;<br>b) identify the statutory requirements that apply to the development;<br>c) describe in general how the environmental performance of the development would be monitored and manage;<br>d) describe the procedures that would be implemented to:<br>• keep the local community and relevant agencies informed about the operation and N/A – relates to pre 2020 action environmental performance of the development;<br>• receive, handle, respond to, and record complaints;<br>• resolve any disputes that may arise during the course of the development;<br>• respond to any non-compliance;<br>• manage cumulative impacts; and<br>• respond to emergencies; and<br>e) describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the development. | | N/A |

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| 60a | The Applicant must prepare and implement a Construction Environmental Management Plan (CEMP) to outline environmental management practices and procedures to be followed during the construction of the development. The Plan must include, but not necessarily be limited to:<br>a) a description of all activities to be undertaken on the site during construction of the facility, including an indication of stages of construction, where relevant;<br>b) statutory and other obligations that the Applicant is required to fulfil during construction, including all approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies;<br>c) specific consideration of measures to address any requirements of the Department, Council and the EPA during construction;<br>d) details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts; and | N/A – relates to pre 2020 action | N/A |

| Number | Condition | Finding | Compliance (Y/N) |
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| | e) a description of the roles and responsibilities for all relevant employees involved in the construction of the development.<br><br>The CEMP must be submitted for the approval of the Secretary prior to the commencement of construction of the development. | | |
| **Revision of Strategies, Plans and Programs** | | | |
| 60b | Within three months of:<br>a) the submission of an AEMR under condition 63;<br>b) the submission of an Incident Report under condition 62;<br>c) the submission of an Independent Audit under condition 64;<br>the approval of any modification of the conditions of this consent; or<br>e) the issue of a direction of the Planning Secretary under condition 4.<br>The strategies, plans and programs required under this consent must be reviewed, and the Department must be notified in writing that a review is being carried out. | N/A – relates to pre 2020 action d) | N/A |

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| 60c | If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.<br><br>*Note: This is to ensure that strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.* | No such requirements during term of audit | N/A |
| **ENVIRONMENTAL REPORTING** | | | |
| **Incident Reporting** | | | |
| 61 | Within 24 hours of detecting an exceedance of the limits/performance criteria in this approval or the occurrence of an incident that causes (or may cause) harm to the environment, the Applicant must notify the Department and other relevant agencies of the exceedance/incident. | No reportable incidents on incident register<br>Evidence:<br>• Evidence list # 9 – incident complaint register | N/A |
| 62 | Within 6 days of notifying the Department and other relevant agencies of an exceedance/incident, the Applicant must provide the Department and these agencies with a written report that:<br>describe the date, time, and nature of the exceedance/incident;<br>identify the cause (or likely cause ) of the exceedance/incident;<br>describe what action has been taken to date; and<br>d) describe the proposed measures to address the exceedance/incident. | No reportable incidents on incident register a)<br>Evidence: b)<br>• EI-10– incident complaint register c) | N/A |

| Number | Condition | Finding | Compliance (Y/N) |
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| **Annual Reporting** | | | |

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| 63 | Within 12 months of this approval, and annually thereafter, the Applicant must submit an AEMR to the Secretary and relevant agencies. This report must:<br>a) identify the standards and performance measures that apply to the development;<br>b) describe the works carried out in the last 12 months;<br>c) describe the works that will be carried out in the next 12 months;<br>d) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years;<br>e) include a summary of the monitoring results for the development during the past year;<br>f) include an analysis of these monitoring results against the relevant:<br>• impact assessment criteria/limits;<br>• monitoring results from previous years; and<br>• predictions in the EA;<br>g) identify any trends in the monitoring results over the life of the development;<br>h) identify any non-compliance during the previous year; and<br>i) describe what actions were, or are being, taken to ensure compliance. | AEMRs have been lodged as required. AEMRs include required content.<br>Evidence:<br>• EI-1, EI-2, EI-3– AEMRs 2020, 2021, 2022 | Y |
| **AUDITING** | | | |
| **Independent Environmental Audit** | | | |
| 64 | Within 12 months of the commencement of operations, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:<br>a) be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Secretary;<br>b) be undertaken in consultation with EPA, DPI and Council;<br>c) assess whether the development is being carried out in accordance with industry best practice;<br>d) assess the environmental performance of the development, and its effects on the surrounding environment and sensitive receivers;<br>e) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; | This audit | Y |

| Number | Condition | Finding | Compliance (Y/N) |
|---|---|---|---|
| | f) review the adequacy of any strategy/plan/program required under this approval; and, if necessary,<br>g) recommend measures or actions to improve the environmental performance of the development, and/or any strategy/plan/program required under this approval. | | |
| 65 | Within 6 weeks of completing this audit, or as otherwise agreed by the Secretary, the Applicant must submit a of the audit report to the Secretary with a response to any recommendations contained in the audit report. | This audit copy | - |
| 66 | Within 3 months of submitting an audit report to the Secretary, the Applicant must review and if necessary revise the strategy/plans/programs required under this approval to the satisfaction of the Secretary. | Previous audit outcomes were not all completed within the required timeframe. Note actions were completed prior to this audit so no further action possible | **No**<br>Audit corrective action plan will be created, managed and completed by EHS manager. |
| **ACCESS TO INFORMATION** | | | |
| 67 | Within 3 months of the approval of any strategy/plan/program required under this approval (or any subsequent revision of these strategies/plans/programs), or the completion of the audits or AEMRs required under this approval, the Applicant must provide a copy of the relevant document/s to:<br>a) the relevant agencies, and<br>b) any interested party upon request. | Previous audit outcomes were not all completed within the required timeframe. Note actions were completed prior to this audit so no further action possible | **No**<br>Audit corrective action plan will be created, managed and completed by EHS manager. |

## 2.5 Schedule 5 – Statement of Commitment

| Number | Condition | Finding | Compliance (Y/N) |
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| General | The Applicant must prepare and implement the following management plans for the development:<br>A Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan, which incorporate an Erosion and Sediment Control Plan; | OEMP is present and contains ESCP type information. However bulk grain store areas is not considered hence ESCP is not adequate and requires revision<br>Evidence:<br>• EI-15 - OEMP is part of Soil and Water Management Plan<br>Recommendation: Develop an Erosion and Sediment Control Plan, especially for "seed bunker" area.<br>Erosion control will be managed when ROBE is doing the bunker modification to upgrade and approve the bunkers. | No |
| | Landscape Management Plan detailing requirements for roadside landscaping and planting to minimise distant views and enhance near views from Byrnes Road and Trahairs Roads, including monitoring and maintenance of landscaping; | There have been no substantive changes to the landscaping since the 2020 Audit. Screening trees remain in place. The planting is generally consistent with the requirements of the Landscape plan.<br>Evidence:<br>• EI-25 – Landscape management plan<br>• Photo 20: Treated sewage effluent irrigation area<br>• Photo 25: Byrnes Road emergency access point<br>• Photo 61: Sewage treatment plant | Y |
| | An Energy Savings Action Plan in accordance with the requirements of OEHW and the Guidelines Energy Savings Action Plans (DEUS 2005). The Energy Savings Action Plan would include details of greenhouse gas abatement measures and energy efficiency measures for the operation of the proposed IOPP; | The ESAP plan has been provided. Note that an audit of the implementation of this plan for has not been undertaken.<br>Evidence:<br>• EI-26 – Energy Plan | Y |

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| A Traffic Management Plan (TMP) must be prepared prior to site establishment and construction. The TMP must incorporate a Transport Code of Conduct, which would outline and manage the transportation routes to the site for heavy vehicles and B-doubles. The TMP would also include:<br><br>Heavy vehicle access to the site,<br><br>Deliveries and dispatch of products; Heavy vehicle parking,<br><br>Internal speed limits; and<br>Use of truck turnaround areas. | A traffic management plan is in place and signage to advise on conformance with the plan is clearly visible on site<br><br>Evidence:<br><br>• EI-14 – Operational traffic management plan | Y |
| A Procurement Plan for palm oil must be implemented prior to commencement of operation which must:<br><br>• Identify environmentally and socially responsible feedstock materials,<br>• Include procedures for the sourcing of such feedstock,<br>• Include evidence of legal sourcing of feedstock; and<br>• Contain procedures for regular review of suppliers. | No palm oil procurement being undertaken | N/A |

| Number | Condition | Finding | Compliance (Y/N) |
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| Additional | Applicant will facilitate the establishment of a community liaison group to keep communication open between the Applicant and the public regarding issues that may arise during construction and other means including:<br><br>operation of the plant and assist with the implementation of appropriate landscaping off site to the | No CLG has been established with communication with the community facilitated using general<br><br>Newsletter<br>• satisfaction of community and DOP.<br>• Web page **No**<br>• Phone line<br><br>Recommendation: Seek to amend approval to align with current practice as current engagement appears to be fit for purpose.<br>Robe to look at having TEAMS meeting with all stakeholders, information is available on our website, we do have growers' days. | |

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| | The Applicant must ensure the design and operation of the IOPP minimises the potential release of odour emissions. | Air quality monitoring has yielded results within acceptable limits fugitive No odour complaints have been received within the audit period<br>Evidence:<br>• Evidence list # 4, 5, 6, 7, 9 – air emissions reports | Y |
| Odour and Air Quality | The Applicant must take all practicable measures to ensure that air emissions during the construction and operation of the development are within relevant air quality and odour criteria and guidelines. | As above | Y |
| | The Applicant must ensure that the CEMP includes an Erosion and Sediment Control Plan to minimise dust generation from the site. | N/A – construction item | Y |
| | The Applicant must prepare and implement an Energy Savings Action Plan for the development, which would be prepared in accordance with the requirements of DECCW and the Guidelines for Energy Savings Action Plans (DEUS 2005) in order to maximise energy efficiency associated with the IOPP. The Energy Savings Action Plan would include details of greenhouse gas abatement measures and energy efficiency measures for the operation of the proposed IOPP. | The ESAP plan has been provided. Note that an audit of the implementation of this plan has not been undertaken<br>Evidence:<br>• EI-26 – Energy Plan | Y |
| Hazard and risk | the Applicant must develop a plant operating procedure documenting procedures for the shutdown of operations and removal of flammable liquids in the event that nitrogen generation equipment at the plant fails. | Shutdown procedure has been reviewed and required content is present<br>Evidence:<br>• EI-39 – Site Shutdown Procedure | Y |
| | The Applicant must ensure that corrosive materials spill kits are installed throughout areas of the IOPP where corrosive materials are stored, handled and used at the site. | Spill kits were strategically placed throughout the project site and observed during the site inspection. While kits were present and did contain the required contents (only 3 at random inspected), opportunity for improvement exists regarding maintenance of kits.<br>Evidence:<br>• Photo 55: Spill kit<br>• Photo 56: Spill kit contents | Y |
| | The Applicant must engage an appropriately qualified consultant to undertake a fire safety study to determine locations at the site where fire water cooling would be required to minimise the potential a fire incident and implement recommendations of the report. | Compliance with fire safety obligations has been verified by others. A contract exists with Wagga Fire and Security to regularly inspect and maintain fire safety equipment on site. for | Y |

| Number | Condition | Finding | Compliance (Y/N) |
|---|---|---|---|
| | | Evidence:<br>• EI-29 - fire safety report | |
| | The Applicant must ensure that fire hoses on the site are fitted with a foam generation attachment at least 20 L of foam concentrate must be maintained at locations where a foam generating attachment where flammable and combustible liquids are stored and handled. A storage of at attachments were noted to be present during site inspection. | Compliance with fire safety obligations has been verified by others. The required each plant area is held. Evidence:<br>• EI-29 - fire safety report | Y |
| | The Applicant must implement all practicable measures to contain firewater on the site and ensure the water management system maintains a minimum freeboard capacity of 162 m3. The first pond must contain all stormwater from plant areas, roadways and open yard areas. | Significant freeboard was present in the stormwater dam however exact verification of that capacity was not able to be undertaken. It is recommended that a storage volume flush retention indicator be installed within the stormwater dam so as the required volume can be easily visually identified.<br>It is noted that the original design of the pond was sufficient for the plant area and firefighting water retention.<br>The bulk grain store also largely drains to the stormwater pond. It is likely that with the additional inflow the pond does not have sufficient capacity to service the site.<br>Evidence:<br>• Photo 35: Stormwater control dam from bulk grain store<br>• Photo 36: Stormwater Dam | Unable to confirm |
| Surface Water Quality | The Applicant must implement all practicable measures to minimise soil erosion and discharge of sediments from the site. The Erosion and Sediment Control Plan prepared as part of the CEMP must ensure:<br>• Sediment and erosion control measures, such as sediment fences, are installed and maintained, with particular attention where the drainage is towards a surface water body,<br>• Stockpiles are stabilised and remain covered and appropriate sediment and erosion control measures are installed down slope of all stockpiles; and<br>• Spill kits are made available to construction vehicles so that accidental leaks and spills can be controlled. Areas containing storage tanks must be fully bunded to contain accidental spills | N/A – construction phase | N/A |

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| Groundwater | A Groundwater Monitoring Plan (GMP) will be developed and implemented prior to the operation of development. The GMP will include:<br>Recommendations for the installation of additional monitoring wells including construction details.<br>Development of a groundwater monitoring schedule including sampling methodology and timetable; ongoing monitoring requirements. | Groundwater monitoring has been undertaken by Airlabs on a regular basis. It is noted the proposed that there is generally no groundwater present.<br>Groundwater monitoring would appear to add little if any value to environmental performance at the site. Consideration should be given to making application to remove and | Y |

| Number | Condition | Finding | Compliance (Y/N) |
|---|---|---|---|
| | Preparation of a consolidated Groundwater Management Plan to be implemented during operation of the proposed development. | Evidence:<br>• EI-13 – Groundwater monitoring report<br>• EI-15 – Soil and Water management plan | |
| Waste Management | The Applicant must implement all practicable measures to minimise the generation of waste from the proposed IOPP. | General statement – the Operational EMP contains waste management practice. The management of waste streams observed on site was appropriate. | Y |
| | Wastes requiring removal from the site must be collected and disposed of by an appropriately licensed waste contractor. | Waste on site was generally removed by subcontractor Smallman Bros as evidenced by their logo being present on skips etc around the site. During the site visit Smallman were contacted by site staff and collection of a spent bleaching earth skip was organised.<br>Smallman bros are understood to have all necessary approvals in place to manage the waste streams although this has not been independently verified.<br>Evidence:<br>• Photo 26: General waste skip<br>• Photo 45: Spent bleaching earth<br>• Photo 46: Spent bleached earth skip<br>• Photo 49: Spent bleached earth skip | Y |

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| | Wastewater to be reused following treatment must be stored in the 40 ML effluent storage dam, which must be refurbished to the requirements of DECCW. This would include constructing the dam with a PVC liner. | The storage dam was inspected. It was visually in good condition and a PVC liner was visible.<br>Evidence:<br>• Photo 41: Wastewater storage pond<br>• Photo 42: Wastewater storage pond<br>• Photo 43: Wastewater storage pond overflow | Y |
| Traffic and Transport | The Applicant must ensure that construction and operational traffic is managed in accordance with the TMP. | A traffic management plan is in place and signage to advise on conformance with the plan is clearly visible on site<br>Evidence:<br>• EI-14 – Operational traffic management plan | Y |
| | The Applicant must consult with the relevant traffic authority to obtain a s138 permit under the Roads Act 1993 to undertake an upgrade of the intersection at Byrnes Road and Trahairs Road, and to widen and seal Trahairs Road in accordance with relevant standards and guidelines. | N/A – construction related condition | N/A |
| Visual | The Applicant must prepare a Landscape Management Plan, which would consider local endemic species and accommodate future land uses and receptors in the area. | There have been no substantive changes to the landscaping since the 2020 Audit. Screening trees remain in place. The planting is generally consistent with the requirements of the Landscape plan. | Y |

| Number | Condition | Finding | Compliance (Y/N) |
|---|---|---|---|
| | | Evidence:<br>• EI-25 – Landscape management plan<br>• Photo 20: Treated sewage effluent irrigation area<br>• Photo 25: Byrnes Road emergency access point<br>• Photo 61: Sewage treatment plant | |
| | The Applicant must ensure that landscaping is undertaken in accordance with the Landscape Management Plan. | See above | Y |

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| | Exterior lighting would be designed to minimise light spill and would be generally in accordance with Australian Standard 4282-1997 Control of the Obtrusive Effects of Outdoor Lighting, notwithstanding functional and safety requirements. | N/A – Design issue for construction | N/A |
| Additional visual | Light spill from the extraction plant building will be minimized by hooding of eastern and northern façade openings to direct light downwards. | hooding on eastern and northern building facades was observed to be present<br>Evidence:<br>• Photo 44: Solvent extraction plant | Y |
| Heritage | The Applicant must ensure that in the event that Aboriginal objects are identified during works on site, works in the vicinity of the find would cease and the IOPP Environmental Representative would notify a heritage professional to obtain advice on how to proceed. Works would not recommence until heritage requirements identified through this process have been met. | N/A – construction condition | N/A |
| | Should suspected skeletal material be uncovered during the course of any site works or through subsidence landscape modification, all works must cease and the DECCW, the NSW Police and the NSW Coroner's office contacted immediately, regardless of any existing environmental approvals | N/A – construction condition | N/A |
| | Contractors must be made aware of the above recommendations and advised of their responsibilities in relation to the protection of Aboriginal objects and sites under state legislation. | N/A – construction condition | N/A |
| Flora and fauna | The Applicant must ensure that all practicable measures are implemented to minimise the potential impacts on flora and fauna, including:<br>• Felled trees must remain in situ for at least 24 hours to allow fauna species to relocate.<br>• Qualified personnel must be on hand to check trees hollows for wildlife and assist with relocation, if required; and<br>• Should wildlife be inadvertently injured, an accredited veterinarian (and through them possibly a wildlife care group) must be<br>• contacted. | N/A – construction condition | N/A |
| | | | Y |

| Number | Condition | Finding | Compliance (Y/N) |
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| | The Applicant must undertake weed monitoring during construction and operation to control weed infestations and apply appropriate control measures, if required.<br><br>Measures to control Patterson's Curse must be implemented in accordance with the Class 4 Noxious Weed Control Management Plan 2006 – 2011.<br><br>NB: Noxious weed Act has been repealed and replaced with the Biosecurity Act. Subsequently Patterson's Curse has been removed from the list of priority weeds. | While some weeds were observed on the site, infestations were minor I nature. Regular weed spraying is understood to occur.<br><br>It is recommended that sewage treatment plant compound be treated in the near future.<br><br>Evidence:<br>• Photo 61: Sewage treatment plant<br>• Photo 62: Sewage treatment plant | |
| | The Landscape Management Plan must incorporate species endemic to the area | See previous | Y |