

Appendix Q: GHD Independent Audit Report



Bulk Recovery Solutions Pty Ltd

BRS Ingleburn Independent Audit

Audit Report

August 2019

Executive summary

GHD Pty Ltd (GHD) was engaged by Bulk Recovery Solutions Pty Ltd (BRS) to conduct an independent audit of their Resource Recovery Facility in Ingleburn, NSW. The facility operates in accordance with a number of Development Consents (F491/2002, Order 10257/2006 and DA 948/2015/DA-I/B) and Environment Protection Licence (EPL) 20797. BRS has submitted a State Significant Development (SSD) application 8593 to the Department of Planning, Infrastructure and Environment (DPIE) to expand the operations to increase waste processing and storage quantities, and extend operating hours.

BRS's facility is located at 16 Kerr Road, Ingleburn, NSW. Current operations include recovery of solid and liquid wastes, predominantly from construction, up to 30,000 tonnes per annum with approval to store 5,000 tonnes at any time. These wastes undergo various non-thermal treatments specific to the waste type e.g. crushing, settling/flocculation. Final product is segregated and stockpiled/stored for transport offsite.

The Secretary's Environmental Assessment Requirements (SEARs) for SSD 8593 required an audit of the operation of the existing facility against the conditions of all development consents and all environment protection licences to ascertain the baseline compliance of the site. This report presents the findings of the independent audit.

The facility has been designed and constructed to incorporate a number of environmental controls including:

- Constructed on a hardstand
- Sediment controls on stormwater inlets
- Clean and dirty water segregation
- Capture, treatment and reuse of wastewater generated on site
- Installation and operation of dust suppressions systems in the crushing shed and around site boundary
- Enclosure of a number of the facility's processes to avoid air quality and noise impacts on neighbouring sensitive receivers
- Management of internal traffic movements.

BRS are generally compliant with the requirements of all Development Consents and EPLs.

Compliance and improvement opportunities were identified relating to conformance to operating hours, maintenance of records to demonstrate implementation of environmental controls, preparation and update of site management plans to reflect current operations and processes, and storage of minor quantities of flammable goods.

These non-compliances are generally minor in nature and do not have a significant impact on BRS's overall compliance.

This report is subject to, and must be read in conjunction with, the limitations set out in Section 1.4, and the assumptions and qualifications contained throughout this report.

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1. Introduction

1.1 Introduction

Bulk Recovery Solutions Pty Ltd (BRS) operate a resource recovery facility at 16 Kerr Road, Ingleburn, NSW (the facility). The resource recovery facility operations include recovery of solid and liquid wastes, predominantly from construction, up to 30,000 tonnes per annum with approval to store 5,000 tonnes at any time. These wastes undergo various non-thermal treatments specific to the waste type e.g. crushing, settling/flocculation. Final product is segregated and stockpiled/stored for transport offsite. The waste types received include:

- Stormwater contaminated with gross pollutants
- Drilling mud
- Non-destructive digging waste
- Pavement concrete
- Soil (restricted solid waste and general solid waste)
- Concrete washout from concrete batch plants
- Concrete from agitators
- Building and demolition waste
- Municipal and commercial waste consisting of household domestic recycling waste
- Foundry sand
- Excavated road material
- Recovered aggregate
- Virgin excavated natural material.

BRS operate the facility in accordance with the licenses and approvals summarised in Table 1 below.

BRS have submitted a State Significant Development (SSD) application 8593 to the Department of Planning, Infrastructure and Environment (DPIE) to expand the operations to increase waste processing and storage quantities, and extend operating hours.

GHD Pty Ltd (GHD) was commissioned by BRS to conduct an independent audit of BRS's compliance with the requirements of the abovementioned approvals. This report responds to the audit scope as outlined in section 1.2.

1.2 Scope of the audit

The scope of the audit was outlined in the Secretary's Environmental Assessment Requirements (SEARs) for SSD 8593, BRS Resource Recovery Facility, 16 Kerr Road, Ingleburn as follows:

The EIS must address the following specific matters:

- *Suitability of the Site – including:*
 - *Results of an independent audit of the operation of the existing facility against the conditions of all development consents and all Environment Protection Licences in force in respect of the existing facility to ascertain the baseline of the site.*

Details of the licenses and approvals applicable to the operation of the existing BRS resource recovery facility are presented below in Table 1. The methodology of the audit is outlined in section 2. The audit provides a baseline of the compliance of the facility as at the date of the audit.

Table 1 Licenses and approvals

Licence / Approval	Details
Environment Protection Licence (EPL) 20797	Resource recovery, waste processing and waste storage
Development Consent F 491/2002	Erection of truck workshop and office
Development Consent 948/2015/DA-I/B (Mod B)	Use of site as a resource recovery facility which the site is currently operating under, including the modification for the facility to accept up to 30,000 tonnes per annum and storage up to 5,000 tonnes of approved materials and 24 hour operation of the mud plant and forklift

1.2.1 Audit scope exclusions

While Land and Environment Court Order 10257/2006 is applicable to the site, it relates solely to the construction and operation of a concrete batch plant. At the time of the audit, BRS advised that the work associated with the concrete batch plant was being undertaken by the shared site lessee, Australian Weighing Equipment (AWE). This advice was supported by documented financial transactions for the purchase of concrete batch plant components, dated August 2018 to a total sum in excess of \$500,000 (\$AUD).

The consent conditions under Land and Environment Court Order 10257/2006 have therefore been excluded from the scope of this audit.

During the site inspection undertaken as part of the audit, observations included the partial construction of a concrete batch plant including low impact installation of prefabricated equipment and electrical components and wiring.

1.3 Audit team members

Demelza Scott and Ben Bracken of GHD undertook the audit at the request of BRS. The participants in the audit were:

- Demelza Scott (GHD) – Lead Auditor
- Ben Bracken (GHD) – Auditor
- Brad Rose (BRS) – Sales and Technical Manager.

1.4 Limitations

This report: has been prepared by GHD for Bulk Recovery Solutions Pty Ltd and may only be used and relied on by Bulk Recovery Solutions Pty Ltd for the purpose agreed between GHD and the Bulk Recovery Solutions Pty Ltd as set out in section 1.1 and 1.2 of this report.

GHD otherwise disclaims responsibility to any person other than Bulk Recovery Solutions Pty Ltd arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described throughout this report. GHD disclaims liability arising from any of the assumptions being incorrect.

GHD has prepared this report on the basis of information provided by Bulk Recovery Solutions Pty Ltd and others who provided information to GHD (including Government authorities), which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

GHD has not been involved in the preparation of the Environmental Impact Statement (KDC, 2019) and has had no contribution to, or review of the Environmental Impact Statement (KDC, 2019) other than in the preparation of this audit report. GHD shall not be liable to any person for any error in, omission from, or false or misleading statement in, any other part of the Environmental Impact Statement (KDC, 2019).

The opinions, conclusions and any recommendations in this report are based on information obtained from, and testing undertaken at or in connection with, specific sample points. Site conditions at other parts of the site may be different from the site conditions found at the specific sample points.

Investigations undertaken in respect of this report are constrained by the particular site conditions, such as the location of buildings, services and vegetation. As a result, not all relevant site features and conditions may have been identified in this report.

Site conditions (including the presence of hazardous substances and/or site contamination) may change after the date of this report. GHD does not accept responsibility arising from, or in connection with, any change to the site conditions. GHD is also not responsible for updating this report if the site conditions change.

2. Methodology

The audit was carried out in accordance with the requirements of ISO 19011:2018 *Guidelines for auditing management systems* and the Department of Planning and Environment's *Independent Audit Guideline* (2015). In particular, the GHD team conducted the audit considering the following:

- The key principles of auditing including the requirement of auditors to conduct themselves in an ethical manner, report truthfully and accurately, be diligent and have the appropriate competency to conduct the audit, be independent, and apply an evidence-based approach to conducting the audit.
- The audit objectives, scope and criteria were based on the Conditions of Consent. The scope of the audit was limited to compliance with the conditions of Development Consents F 491/2002, 948/2015/DA-I/B and EPL 20797. BRS advised that Development Consent 1113/2013/DA-DE lapsed as the conditions in Schedule A were not completed to Council's satisfaction prior to the expiry date of the deferred commencement consent (3 December 2014).
- An appropriate audit team was selected with skills and experience in environmental auditing to conduct an assessment of compliance with the Conditions of Consent.
- Relevant documentation (as detailed in section 2.1) was reviewed prior to the audit to make an initial assessment of system compliance with the requirements of the Conditions of Consent, and to prepare an audit checklist containing appropriate questions to address during the site audit.
- Audit opening and closing meetings were conducted with the auditee to explain the format of the audit upfront and to highlight preliminary audit findings at the conclusion of the site audit.
- During the site inspection, audit interviews were conducted with BRS personnel and additional documentary evidence was collected. An inspection of the site was conducted to verify relevant compliance aspects of the audit.
- Verifiable evidence was collected and recorded throughout the audit and evaluated against the Conditions of Consent to assess compliance or non-compliance. All evidence was recorded on the Compliance Table (Appendix A).
- A complete and accurate report was prepared and distributed to provide a record of the audit and its findings.

2.1 Review of documentation

GHD reviewed documentation relevant to the operations of the facility, which included:

- Management plans referenced in the Development Consent and EPL
- Monitoring records
- Correspondence with relevant stakeholders including authorities
- Site procedures
- Reports prepared as required in the Development Consent and other instruments.

The documentation sighted by the auditors is referenced throughout Appendix A – Compliance Table.

2.2 Site audit and inspection

The inspection was conducted by GHD auditors Demelza Scott and Ben Bracken on 20 June 2019 in the company of Brad Rose representing BRS. The auditors conducted interviews with relevant site personnel and made observations guided by the audit criteria, which addressed the conditions of the Development Consents and EPL.

BRS personnel provided both soft and hard copies of documentary evidence to support compliance with the audit criteria, including a selected cross-section of data, records, correspondence, procedures and management plans. Photos taken during the site inspection are provided in Appendix B.

2.3 Reporting

This report presents the findings of the BRS Ingleburn Independent Audit required by the SEARs for SSD 8593.

3. Key findings

BRS's SEARs for SSD 8593 required the audit to review the operation of the Ingleburn Resource Recovery Facility against the conditions of all Development Consents and EPLs.

The following sections outline the auditors' assessment of the compliance of the facility with the Development Consents and EPL.

3.1 Key findings

The audit found that BRS are generally compliant with the requirements of all Development Consents and EPLs. BRS have implemented sound processes for:

1. Review and acceptance/rejection of loads received
2. Capture, treatment and reuse of site wastewater and protection of stormwater
3. Traffic management on site.

3.1.1 Management of loads received

BRS have a robust process in place for recording, inspecting and rejecting loads of waste materials received at the facility, which are documented in the BRS *Resources Entering and Leaving Procedures* (2018):

- On arrival of an incoming load at the facility the driver drives onto one of two weighbridges.
- The driver completes an incoming waste declaration into the weighbridge records management system including product type, source location, transport company, vehicle registration, date/time and reference. These details are printed onto a label with sample jars provided for collection of a sample of the load to be delivered.
- Drivers are required to open the covers on their loads to allow inspection by Weighbridge Officers. Cameras are mounted on the side of the building to capture real time images of loads being delivered to site.
- The vehicle operator drives to the appropriate unloading station (tip point) where more cameras are mounted to monitor loads as they are being unloaded. Samples are taken from the load prior to discharge at the designated location. This was observed for liquid wastes discharged during the audit. pH meters are available across the site for sampling of liquid wastes.
- Samples of all loads are sent to the onsite laboratory where they are reviewed and tested for parameters including pH and solids content.

The key contaminants that are identified in the waste materials received at site are asbestos in solid waste and hydrocarbons in liquid waste, and this is the focus of the Resources Entering and Leaving Procedures. There are however, other prohibited waste types specified in EPL 20797 which are not captured in the Resources Entering and Leaving Procedures. Where contaminants are identified in loads, the load is rejected and the driver is sent away from site, with their entire load and a copy of a rejected load notice, which specifies that the load needs to be taken to a facility that is licensed to accept the waste.

3.1.2 Wastewater management

The facility has been well designed to separate and manage clean and dirty water generated on the site:

- The facility is on hardstand (concrete) surface.
- All active / operational areas of the site with capacity to produce contaminated water (primarily high sediment load) drain to a site water management collection system via drainage pits fitted with automated pumps. Water is treated and stored for reuse in aboveground tanks. On site reuse includes dust suppression, wash down and irrigation of landscaped areas.
- Frequently trafficked areas of the site are kept clean and free from any waste materials through use of a street sweeper maintained on the premises, manual sweeping and wash down.
- Stormwater inlets that drain to the local stormwater network are protected by suitable sediment controls including sediment socks or concrete bunds, internal stocking filters and shutoff valves for activation in the event of a spill.
- Weekly monitoring of stormwater inlets and internal drains using the *Drain and Pit Checklist*.
- BRS have entered into a Trade Waste Agreement with Sydney Water for the release of excess wastewater into the sewer network (Trade Waste Agreement 384998 dated 29/03/2018). A monitoring point has been established which allows a water quality meter to be plugged in to monitor the quality of wastewater to be discharged. BRS advised that Sydney Water periodically come to site and monitor the wastewater quality.

3.1.3 Traffic management

Numerous trucks were observed to enter and leave the site during the time the auditors were on site with minimal traffic conflicts. Good signage is in place directing trucks around the site and to drive through the wheel wash prior to leaving site. Drivers were observed to be adhering to the site traffic rules. A new driver to site was undergoing induction at the time of the audit, this was overseen by the Weighbridge Officer. Once on site, all trucks remain on site while awaiting unloading/loading.

3.2 Key areas for improvement

Key areas identified for improvement are minor in nature and do not have a significant impact on BRS's overall compliance, these include:

1. Acceptance of loads outside of approved hours
2. Maintenance of records to demonstrate implementation of environmental controls
3. Prepare and update of site management plans to reflect current operations and processes on site
4. Storage of minor quantities of flammable goods.

3.2.1 Operation outside approved hours

BRS acknowledged that loads are accepted outside of the specified hours of operation in EPL 20797 in circumstances where they believed the loads to be associated with emergency works as per condition L4.4, such as a Sydney Water main rupture or similar.

A week's worth of traffic data obtained from the weigh bridge logs was sighted for the period of Monday 22 July to Sunday 28 July 2018. The logs only recorded the departure times of the vehicles, however for the purpose of this audit, the data provided was deemed sufficient.

The vehicle departure logs indicated numerous vehicle movements, between six to ten truck departures per day on average for the period sighted, outside of the permitted hours (as per EPL 20797) which requires the following:

- Monday to Friday – 7am to 10pm
- Saturday and Sunday – 7am to 6pm
- No traffic on Public Holidays.

Whilst the auditors understand that the transport companies may identify these situations as emergency works, they are not considered to satisfy the definition 'required by police or other authorities for safety reasons' as specified in Condition L4.4. This is normally associated with the movement of oversized loads on public roads.

In addition, no prior notification has been provided to the EPA and affected residents where deliveries of material are accepted outside of hours, as required by Condition L4.4.

BRS advised that as part of the proposed EPL variation, an extension to operating hours would be sought to allow 24 hours, 7 days a week operation of the facility. The absence of complaints, despite the acceptance of deliveries outside of permitted hours indicates that an extension of hours is not likely to be an issue for surrounding residents and businesses.

Refer to Improvement Opportunity 5 and Corrective Action 3.

3.2.2 Records management

As discussed above, BRS are implementing a number of procedures to manage their compliance with conditions of the Development Consents and EPL, where records are maintained for a number of key items including:

- Weighbridge records
- Servicing and maintenance of plant and equipment
- Rejected load notices
- EPL annual returns
- Stormwater drain and pit completed checklists
- Induction register for site personnel
- Plant operator competency and licences.

BRS are not however maintaining records for other key items including:

- Driver inductions
- Complaints.

BRS have a process in place for the induction of drivers and management of loads received at the facility, which was observed to be well understood by drivers, however no record is maintained of drivers who have completed the induction. A simple register, where a driver can sign that they have been inducted by BRS, the person who inducted them, and the date and time, would allow BRS to demonstrate that they are implementing this process. Refer to Improvement Opportunity 1.

BRS advised that they have not received any complaints. EPL 20797 includes specific details that are required to be maintained for complaints received at the facility (Condition M2).

Developing a complaints register that includes all of the details required by EPL 20797 would demonstrate BRS's ability to capture and retain the required information and avoid potential non-compliances in future audits. Refer to Improvement Opportunity 9.

3.2.3 Site management plans

BRS maintain an environmental management plan for the facility however it is considered generic with regards to environmental risks, potential impacts and management measures and does not include details specific to the operation of the facility, such as reference to:

- Conditions of EPL 20797 and the Development Consents
- Scope and purpose of the EMP
- Objectives and targets
- Relevant legislation
- Specific procedures and controls being implemented on site including Resources Entering and Leaving Procedures, Weekly Drain and Pit Inspections, Driver Inductions, Dust Mitigation System and Stormwater Controls.

It was noted that BRS are implementing processes to manage their compliance with conditions of the EPL and Development Consents which are not currently reflected in the environmental management plan.

The environmental management plan should be reviewed to ensure that it accurately reflects the procedures and processes being implemented on site, including those required for compliance with conditions of development consents and the EPL 20797. Any redundant requirements should be removed to avoid compliance issues in future audits. Refer to Corrective Action 9.

3.2.4 Flammable goods storage

BRS maintain a range of flammable and combustible liquids, in relatively small quantities, across the facility, such as:

- Hydraulic oil in drums were observed in a designated area of the crushing shed
- Paints, thinners etc. are stored in a designated flammable goods container
- A diesel fuel bowser is maintained on site
- Small quantities of cleaning chemicals were stored across the facility.

Some issues were identified regarding the storage of fuels and chemicals across the site, these types of issues are found across most industrial sites and are easily remedied.

Placarding – the flammables storage container and diesel fuel bowser were placarded. There was no placarding where the hydraulic oil drums are stored.

Bunding – the fuel bowser was a self-bunded fuel container, portable bunds were available in the hydraulic oil storage area however, drums were not being stored on the bunds and there was no bunding in the flammables container.

Spill kits – there were a number of spill kits located across the site which were stocked and placarded, two were not placarded.

Safety Data Sheets (SDSs) – SDSs were out of date at all storage locations, although BRS advised that they were available online.

Refer to Corrective Action 5.

3.3 Assessment of compliance

A summary of compliance with the conditions of Development Consents F 491/2002, 948/2015/DA-I/B and EPL 20797 is provided in Table 2.

Table 2 Summary of compliance

Compliance	Details	Compliance Status
Compliant	Compliant with all of the requirements of the condition	44
Non-compliant	Does not meet one or more requirements of the condition	10
Not triggered	Condition was not applicable at the time of audit as an activation or timing trigger had not been met	16
Not verified	Compliance could not be determined at the time of the audit due to lack of data, information, or inaccessibility at the time of audit	15
Total number of conditions assessed		85

4. Recommendations

Detailed audit findings are presented in Appendix A. Sections 4.1 and 0 summarise the corrective actions and recommendations of the audit.

4.1 Corrective actions

Corrective actions are required to correct matters of non-compliance identified by the audit. Corrective actions identified during the audit, as detailed in Appendix A, are summarised in Table 3.

Table 3 Summary of corrective actions

Reference No.	Condition	Corrective Action
EPL 20797		
CA1	L3.5 Noise limits	Conduct noise monitoring to confirm that noise from the premises does not exceed the LAeq (15 minute) noise emission criteria specified in Conditions L3.1-3.4.
CA2	L4.2 Operating hours	Apply for a variation to EPL 20797 to operate 24 hours a day, seven day per week.
CA2	L4.4 Delivery of material outside of hours	Cease accepting loads of waste materials outside of operating hours except in accordance with the requirements of Condition L4.4 in the absence of a licence variation as per CA2.
CA4	O4.2 Erosion and sediment control plan	Develop an Erosion and Sediment Control Plan to document the controls installed and maintained on site and to confirm that they are in accordance with the Blue Book.
DA 948/2015/DA-I/B		
CA5	Condition 10 Storage of Flammable and Combustible Liquids	Store all flammable and combustible liquids in accordance with AS 1940.

4.2 Improvement opportunities

Improvement opportunities seek to address matters that may lead to a non-compliance or where elements of the proponent's systems and plans were not found to be effective. The improvement opportunities identified during the audit are summarised in Table 4.

Table 4 Summary of recommendations

Reference No.	Condition	Improvement Opportunity
EPL 20797		
IO1	L2 Waste O1.1 Competency	Maintain a register for driver training / inductions to demonstrate attendance by site personnel / drivers.
IO2	L2 Waste	Implement a documented equipment calibration process according to supplier recommendations, particularly for pH meters, which are known to "drift".
IO3	L2 Waste	Update the <i>Resources Entering and Leaving Procedure</i> to include materials in addition to asbestos that are also not licensed to be accepted by the facility.
IO4	L2 Waste	Update the Waste Management Plan to reflect the procedures and processes carried out on site.
IO5	L4.3 Hours of operation	As part of the EPL variation, Condition L4.3 should be updated to reflect the additional plant and machinery required to operate 24 hours per day for the safe operation of the facility.
IO6	L4.4 Delivery of materials outside of hours	Clarify the circumstances in which this clause can be enacted with the EPA.
IO7	O1.1 Competency	Update the site environmental induction to include the relevant current requirements of EPL 20797 and all Development Consents.
IO8	O3.3 Dust	Include the requirement to cover all loads in the driver induction material.
IO9	M2.1 Complaints	Maintain a complaint form and register to demonstrate capacity to collect and maintain required information in the event of a complaint and its follow up.
IO10	E1.2 Pollution incident	Two separate documents were referenced / observed with regards to incident and emergency management. Update EMP and associated documentation to clarify correct documentation to be implemented.
IO11	E1.2 Pollution incident	Review site processes with regards to training and induction and align with <i>Pollution Incident Response</i>

Reference No.	Condition	Improvement Opportunity
		<i>Management Procedure</i> (PIRMP). This may also require an update of the PIRMP to reflect actual site processes.
DA 948/2015/DA-I/B		
IO12	Condition 17 External areas	Implement measures to prevent the spread of material from the storage bays across the roadway.

5. Conclusion

BRS have submitted a State Significant Development (SSD) application 8593 to the Department of Planning, Industry and Environment (DPIE) to expand the operations BRS have submitted a State Significant Development (SSD) application 8593 to the Department of Planning, Infrastructure and Environment (DPIE) to expand the operations to increase waste processing and storage quantities, and extend operating hours.

The SEARs for SSD 8593 required an audit of the operation of the existing facility against the conditions of all development consents and all environment protection licences to ascertain the baseline compliance of the site. GHD was commissioned by BRS to conduct this independent audit.

As presented in Section 3.3 the audit outcome identified 10 non-compliances resulting in five corrective actions and 12 improvement opportunities. These non-compliances are generally minor in nature and do not have a significant impact on BRS's overall compliance.

Several non-compliances are associated with noise and hours of operation for the current approved activities. It is understood that, as part of the proposed modifications outlined in the EIS, these conditions will be subject change and should be addressed in an EPL variation.

For all other identified non-compliances, it is recommended that BRS develop an action plan with priorities and responsibilities for action and close out. In summary these include:

- Update of Environmental Management Plan and sub-plans, including the waste plan and erosion and sediment control plan and submission to regulatory authorities where required
- Store and manage flammable and combustible liquids in accordance with Australian standards
- Adhere to operating hours in the absence of an EPL variation.

Appendices

Appendix A – Compliance Table

Table 1 EPL 20797 Conditions

Number	Condition	Compliance	Audit Findings												
Administrative Conditions															
A1 What the licence authorises and regulates															
A1.1	<p>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.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Waste processing (non-thermal treatment)</td><td>Non-thermal treatment of general waste</td><td>Any annual processing capacity</td></tr><tr><td>Resource recovery</td><td>Recovery of general waste</td><td>Any general waste recovered</td></tr><tr><td>Waste storage</td><td>Waste storage - other types of waste</td><td>Any other types of waste stored</td></tr></table>	Scheduled Activity	Fee Based Activity	Scale	Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity	Resource recovery	Recovery of general waste	Any general waste recovered	Waste storage	Waste storage - other types of waste	Any other types of waste stored	Compliant	<p>BRS operate a resource recovery facility accepting solid and liquid wastes, predominantly from construction. These wastes undergo various non-thermal treatments specific to the waste type e.g. crushing, settling/flocculation. Final product is segregated and stockpiled/stored for transport offsite. BRS advised that they will be applying for a variation to the EPL as part of the current modification to increase the volume of waste processed and to reflect the general waste being non-putrescible waste only.</p>
Scheduled Activity	Fee Based Activity	Scale													
Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity													
Resource recovery	Recovery of general waste	Any general waste recovered													
Waste storage	Waste storage - other types of waste	Any other types of waste stored													
A2 Premises or plant to which this licence applies															
A2.1	<p>The licence applies to the following premises:</p> <table><tr><th>Premises Details</th></tr><tr><td>BULK RECOVERY SOLUTIONS INGLEBURN</td></tr><tr><td>16 KERR ROAD</td></tr><tr><td>INGLEBURN</td></tr><tr><td>NSW 2565</td></tr><tr><td>LOT 16 DP 717203</td></tr></table>	Premises Details	BULK RECOVERY SOLUTIONS INGLEBURN	16 KERR ROAD	INGLEBURN	NSW 2565	LOT 16 DP 717203	Compliant	<p>The audit was undertaken at the premises identified in Condition A2.1.</p>						
Premises Details															
BULK RECOVERY SOLUTIONS INGLEBURN															
16 KERR ROAD															
INGLEBURN															
NSW 2565															
LOT 16 DP 717203															
A3 Information supplied to the EPA															
A3.1	<p>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.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>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</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	Compliant	<p>The original proposal contained in the EPL application was not available for review as part of the audit.</p> <p>BRS are carrying out the works and activities in accordance with DA 948/2015/DA-I/B and F491/2002</p>												

Number	Condition	Compliance	Audit Findings
A3.2	The Development Application DA 948/2015/DA-DE submitted to Campbelltown City Council on 28 April 2015 is not to be taken as part of the documentation in A3.1, other than those parts specifically referenced in this licence.	Note	
A3.3	The "Environmental Impact Statement, Proposed Resource Recovery Facility, 16 Kerr Road, Ingleburn - 141296_EIS_Rev2," prepared by Benbow Environmental dated April 2015 is not to be taken as part of the documentation in A3.1, other than those parts specifically referenced in this licence.		
A3.4	The additional documents supplied to the EPA in relation to the development, including the "Request for Additional Information Reference DA 948/2015/DA-DE, 141296_Let_Rep_Rev1," prepared by Benbow Environmental dated December 2015 is not to be taken as part of the documentation in A3.1, other than those parts specifically referenced in this licence.		
Limit Conditions			
L1 Pollution of waters			
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.	Compliant	<p>BRS maintain a number of controls to prevent pollution of waters from operation of the resource recovery facility.</p> <p>In total there are six (6) stormwater pits located on site and / or immediately down-gradient. Stormwater protection measures were observed on these stormwater pits including sediment socks and an internal stocking filter drain with one stormwater pit protected by a 100 mm high concrete bund. The stormwater pit at the front of the site within the road gutter was protected with a sediment-sock. BRS undertake daily checks on the drains and pits, sighted completed checklists 22/03/2019 by Suzanne Matthews which checked housekeeping and controls.</p> <p>All surface runoff from the site, except for the areas of site within the stormwater drain catchment, is collected within a series of internal pits. The internal pits have automated pumps which pump the collected surface runoff into the processes system on site.</p> <p>BRS advised that they have a good working relationship with their EPA contact, Matt Davidson, and are in regular communication with the EPA. Records sighted for EPA inspection (joint inspection with NSW WorkCover) dated 17/08/2018, including attendance by EPA's Matt Davidson and Marc Coper.</p>
L2 Waste			

Number	Condition	Compliance	Audit Findings																														
L2.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p> <table><tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr><tr><td>NA</td><td>Liquid Waste</td><td>Drilling mud, non-destructive digging waste, stormwater contaminated with gross pollutants</td><td>Resource recovery Waste processing (non-thermal treatment) Waste storage</td><td>See conditions L2.2 and L2.3</td></tr><tr><td>NA</td><td>Concrete</td><td>Concrete washout from concrete batch plants and residual batch concrete from agitator trucks</td><td>Resource recovery Waste processing (non-thermal treatment) Waste storage</td><td>See conditions L2.2 and L2.3</td></tr><tr><td>NA</td><td>Building and demolition waste</td><td>As defined in Schedule 1 of the POEO Act, as in force from time to time</td><td>Resource recovery Waste processing (non-thermal treatment) Waste storage</td><td>See conditions L2.2 and L2.3</td></tr><tr><td>NA</td><td>General solid waste (non-putrescible)</td><td>Municipal waste, being waste consisting of</td><td>Resource recovery Waste processing</td><td>See conditions L2.2 and L2.3</td></tr><tr><td></td><td></td><td>household domestic recycling waste that is set aside for kerb side collection or delivered by the householder directly to the waste facility (e.g. glass, plastic, cardboard, paper, aluminium, steel), or commercial waste of the same nature</td><td>(non-thermal treatment) Waste storage</td><td></td></tr></table>	Code	Waste	Description	Activity	Other Limits	NA	Liquid Waste	Drilling mud, non-destructive digging waste, stormwater contaminated with gross pollutants	Resource recovery Waste processing (non-thermal treatment) Waste storage	See conditions L2.2 and L2.3	NA	Concrete	Concrete washout from concrete batch plants and residual batch concrete from agitator trucks	Resource recovery Waste processing (non-thermal treatment) Waste storage	See conditions L2.2 and L2.3	NA	Building and demolition waste	As defined in Schedule 1 of the POEO Act, as in force from time to time	Resource recovery Waste processing (non-thermal treatment) Waste storage	See conditions L2.2 and L2.3	NA	General solid waste (non-putrescible)	Municipal waste, being waste consisting of	Resource recovery Waste processing	See conditions L2.2 and L2.3			household domestic recycling waste that is set aside for kerb side collection or delivered by the householder directly to the waste facility (e.g. glass, plastic, cardboard, paper, aluminium, steel), or commercial waste of the same nature	(non-thermal treatment) Waste storage		Compliant	<p>BRS undertake incoming load inspections and any truck loads identified as containing unsuitable material are rejected at the inspection point and issued with a <i>Rejected Load Certificate</i>.</p> <p>Sighted various trucks arriving at site during the audit and depositing waste including drill mud, stormwater, and cement.</p> <p>Incoming load inspections were being undertaken as documented in the <i>Waste Guidelines Building and Construction Waste (V1 Oct 2018)</i>. Specifically Inspection 1 at the front entrance and also inspection bays were observed for Inspection 2 where material is placed on the ground prior to processing.</p> <p>A process was observed to be implemented at the front gate prior going over the weighbridge – this included the driver completing an incoming waste declaration as well as obtaining a sample of the material and a barcoded registration sticker. The collected samples were later observed being tested in the site lab and tested for various parameters including pH and solids content. Records were sighted for 19/06/2019.</p> <p>The process for sample collection was documented in the <i>BRS Entering and Leaving Process / Procedure 2018</i>. Auditor was advised that each driver is trained / inducted into the procedure, however there was no documented evidence to support this.</p> <p>Improvement opportunity 1: Maintain a register for driver training / inductions to demonstrate attendance by site personnel / drivers.</p> <p>For liquid waste loads, the driver / operator was observed taking a sample from the load prior to dumping into sedimentation collection pond. The results indicated that the pH was approximately 4.3 – 4.5 which was considered low (trade Waste Licence 38498 requires pH range of 7-10). The low reading was thought to be attributed to a faulty pH meter requiring calibration. Calibration requirements are included in the EMP. Further checks are undertaken at the back end of the treatment process to verify compliance with discharge criteria as per Trade</p>
Code	Waste	Description	Activity	Other Limits																													
NA	Liquid Waste	Drilling mud, non-destructive digging waste, stormwater contaminated with gross pollutants	Resource recovery Waste processing (non-thermal treatment) Waste storage	See conditions L2.2 and L2.3																													
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Number	Condition					Compliance	Audit Findings
	NA	General or Specific exempted waste	Being treated drilling mud, processed foundry sand, basalt fines, reclaimed asphalt pavement, excavated public road materials, recovered aggregate, recovered fines (continuous and batch), recovered glass sand, recovered railway ballast, slag (blast furnace, electric arc furnace, electric arc furnace ladle, electric arc welding, steel furnace)	Waste processing (non-thermal treatment) Waste storage	See conditions L2.2 and L2.3		Waste requirements prior to discharge to Sydney Water's sewer network. Improvement opportunity 2: Implement a documented equipment calibration process according to supplier recommendations, particularly for pH meters, which are known to "drift". It is noted however that the aforementioned <i>Waste Guidelines</i> has been prepared specifically for the identification of asbestos containing material. Improvement opportunity 3: Update the Resources Entering and Leaving Procedure to include materials in addition to asbestos that are also not licensed to be accepted by the facility. It is also noted that there is no reference to the inspection process within the site Waste Management Plan. Documentation should be updated to relate more specifically to the procedures and processes implement on site. Improvement opportunity 4: Update the Waste Management Plan to reflect the procedures and processes carried out on site.
	NA	Soils	Soil that meets the Restricted Solid Waste Classification (assessed against the CT2 thresholds, Table 1) of the Waste Classification Guidelines as in force from time to time	Waste storage	See conditions L2.2 and L2.3		
	NA	Soils	Soil that meets the General Solid Waste Classification (assessed against the CT1 thresholds, Table 1) of the Waste Classification Guidelines as in force from time to time with exception of the maximum threshold values for contaminants specified in the "Other Limits" column	Waste processing (non-thermal treatment) Waste storage	Arsenic: 40mg/kg; Cadmium: 2mg/kg Copper: 200mg/kg; Mercury: 1.5mg/kg; Zinc: 600mg/kg; Total Petrol Hydrocarbons C6 to C9: 150mg/kg; Total Petroleum Hydrocarbons: 1,600mg/kg; Polycyclic Aromatic Hydrocarbons:		

Number	Condition				Compliance	Audit Findings
	<div>80mg/kg; Polychlorinated Biphenyls (individual): 1mg/kg. No acid sulfate soil or potential acid sulfate soil is to be received at the premises. See conditions L2.2 and L2.3</div> <div>NA Virgin excavated natural material As defined in Schedule 1 of the POEO Act, as in force from time to time Waste processing (non-thermal treatment) Waste storage</div> <div>See conditions L2.2 and L2.3</div>					
L2.2	The total amount of waste processed at the premises from offsite must not exceed 30,000 tonnes per year.				Compliant	<p>BRS do not exceed their licensed waste acceptance limit of 30,000 tonnes per year.</p> <p>The public weighbridge maintained on site records the weight of loads received. These volumes are reported in monthly reports to EPA.</p> <p>Sighted EPA monthly report April 2019 where approximately 3,500 tonnes was received for month. Sighted EPA annual return 2018 however no volumes are reported in this report.</p> <p>Based on the monthly reports, for the last two reporting periods, BRS have received the following total volumes:</p> <ul style="list-style-type: none"> 2016/2017 reporting period: 29,776.20 tonnes 2017/2018 reporting period: 28,204.12 tonnes.
L2.3	The authorised amount of any waste stored at the premises cannot exceed 5,000 tonnes at any one time.				Compliant	<p>BRS advised that the site cannot store more than 4,500 tonnes. This was consistent with site observations.</p> <p>BRS advised that each of the three outside material storage bays were designed to take 50 tonnes each and the three inside bays were designed to take 25 tonnes each. The water tanks, which contain treated process water for reuse on site for dust suppression, irrigation and washdown contain 90 tonnes each. The three unloading sumps (drill mud, stormwater and NDD pits) contain 80 tonnes each.</p> <p>Material generated through the recovery process is reclassified in accordance with the EPA Waste</p>

Number	Condition	Compliance	Audit Findings
			Classification Guidelines. Waste classification certificates prepared by Dirt Doctors Pty Ltd were sighted for 13 June 2019 for soil generated at the site.
L3 Noise Limits			
L3.1	Noise from the premises must not exceed an LAeq (15 minute) noise emission criterion of: a) 46 dB(A) during the daytime period; and b) 40 dB(A) during the evening period; measured at 2 Gordon Avenue, Ingleburn.	Compliant	Noise monitoring, undertaken as part of the recently completed Environmental Impact Statement (EIS), October 2018, included attended noise monitoring at 2 Gordon Avenue on the 8 March 2018 during day, evening and night periods. It was noted that the project site was barely audible during attended daytime noise surveys and inaudible during the evening and night measurements. It was estimated that the site contributed to approximately 40 dB LAeq(15 min). The other locations specified in Condition L3 were not monitored as part of this monitoring event. No additional noise monitoring has been undertaken. There have been no noise related complaints have been received by BRS. Corrective action 1: Conduct noise monitoring to confirm that noise from the premises does not exceed the LAeq (15 minute) noise emission criteria specified in Conditions L3.1-3.4.
L3.2	Noise from the premises must not exceed an LAeq (15 minute) noise emission criterion of: a) 40 dB(A) during the daytime period; and b) 37 dB(A) during the evening period; measured at 1 Redfern Street, Ingleburn.	Non-compliant	
L3.3	Noise from the premises must not exceed an LAeq (15 minute) noise emission criterion of: a) 40 dB(A) during the daytime period; and b) 37 dB(A) during the evening period; measured at 7 Redfern Street, Ingleburn.		
L3.4	Noise from the premises must not exceed an LAeq (15 minute) noise emission criterion of: a) 40 dB(A) during the daytime period; and b) 37 dB(A) during the evening period; measured at 15 Redfern Street, Ingleburn.		
L3.5	To determine compliance with conditions L3.1 to L3.4, noise from the premises is to be measured at the boundary closest to the premises at each of the locations listed.	Non-compliant	The unattended noise survey described above was conducted in general accordance with the procedures described in Australian Standard AS 1055-2018, "Acoustics - Description and Measurement of Environmental Noise". It was not specified in the report where at the premises the noise monitoring was undertaken. This monitoring was only undertaken at 2 Gordon Ave and not at the other premises. Refer to corrective action 1.
L4 Hours of operation			
L4.1	All construction work undertaken at the premises must only be conducted between 7am and 6 pm, Monday to Friday.	Not applicable	At the time of the audit, BRS were not undertaking any construction works. All activities being undertaken by BRS were associated with the operation of the waste management facility.

Number	Condition	Compliance	Audit Findings
			Current construction activities on the site were related to the concrete batch plant which were being undertaken by AWE and therefore did not form part of the audit scope. It was noted that the work included installation of prefabricated equipment and electrical components and wiring. All work was considered low impact.
L4.2	All operational activities at the premises, other than construction work or where permitted by another condition of this licence, must only be conducted between: a) 7am and 10 pm, Monday to Friday; and b) 7am to 6 pm on Saturday and Sunday. No activity is to be carried out on Public Holidays.	Non-compliant	<p>BRS generally operate within the hours permitted by Condition L4.2, however after-hour vehicles / loads are accepted where they are considered to be associated with emergency works (such as Sydney Water main rupture).</p> <p>Operational hours listed on the sign at entrance to site. Main gates close at 10.30 pm at shift change, carpark gates close at 6 pm. Gates reopened at 6 am.</p> <p>Limited weighbridge logs were sighted for a single supplier. Overall weighbridge logs could not be sighted due to access restrictions on the computer server on which they were saved.</p> <p>There have been no traffic or noise related complaints received by BRS.</p> <p>The auditors understand that as part of the EIS that is currently on exhibition, BRS are applying for 24 hours, 7 days per week operation.</p> <p>Corrective action 2: Apply for a variation to EPL 20797 to operate 24 hours a day, seven day per week.</p>
L4.3	Three drum filters and one forklift are permitted to operate 24 hours a day, 7 days per week.	Non-compliant	<p>BRS advised that additional equipment to that specified in Condition L4.3, to run continuously include a sweeper truck and / or bobcat.</p> <p>Improvement opportunity 5: As part of the EPL variation, Condition L4.3 should be updated to reflect the additional plant and machinery required to operate 24 hours per day for the safe operation of the facility.</p>

Number	Condition	Compliance	Audit Findings
L4.4	Conditions L4.1 and L4.2 do not apply to the delivery of material outside the hours of operation permitted if that delivery is required by police or other authorities for safety reasons; and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification is provided to the EPA and affected residents as soon as possible, or within a reasonable period in the case of emergency.	Non-compliant	<p>BRS accept after-hour vehicles / loads where they are considered to be associated with emergency works (such as Sydney Water main rupture clean-up operations etc.).</p> <p>Whilst the nature of the works could be considered emergency works by transport companies, they are not considered to satisfy the definition 'required by police or other authorities for safety reasons' as defined in Condition L4.4. This is normally associated with the movement of oversized loads on public roads.</p> <p>Also, no prior notification has been provided to the EPA and affected residents where deliveries of material are accepted outside of hours.</p> <p>BRS advised that as part of the proposed EPL variation, an extension to operating hours would be sought to allow 24 hours, 7 days a week operation of the facility.</p> <p>The absence of complaints, despite the acceptance of deliveries outside of permitted hours indicates that an extension of hours is not likely to be an issue for surrounding residents/businesses.</p> <p>Improvement opportunity 6: Clarify the circumstances in which this clause can be enacted with the EPA.</p> <p>Corrective action 3: Cease accepting loads of waste materials outside of operating hours except in accordance with the requirements of Condition L4.4 in the absence of a licence variation as per CA2.</p>
L4.5	The hours of operation specified in conditions L4.1 and L4.2 may be varied with written consent if the EPA is satisfied that the amenity of the residents in the locality will not be adversely affected.	Not triggered	This condition has not been enacted by BRS. It is understood that the current EIS will include additional operating hours which will be reflected in an application for an EPL variation.
L5 Potentially offensive odour			
L5.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.	Compliant	BRS are not causing or permitting the emission of offensive odour beyond the boundary of the premises.

Number	Condition	Compliance	Audit Findings
			Odour was not observed to be an issue during the site inspection and there have been no odour related complaints received by BRS.
Operation Conditions			
O1 Activities must be carried out in a competent manner			
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Compliant	<p>BRS demonstrated that activities are carried out in a competent manner in accordance with Condition O1.</p> <p>Driver inductions are provided to new drivers by the Senior Weighbridge Officer. Copy of driver induction observed. There was no documented evidence to demonstrate that drivers had been inducted.</p> <p>Refer to Improvement opportunity 1.</p> <p>BRS advised that all plant and machinery operators were appropriately licensed / permitted. A copy of the consolidated records folder was observed, including records of the following:</p> <ul style="list-style-type: none"> • Driver licences • Asbestos awareness training certificate • First-aid statement of attainment. <p>BRS have a site environmental induction which was sighted including record of inducted personnel. The site induction is however out of date and has not been updated to include current permitted waste streams and volumes, hours of operation etc.</p> <p>Improvement opportunity 7: Update the site environmental induction to include the relevant current requirements of EPL 20797 and all Development Consents.</p>
O2 Maintenance of plant and equipment			
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Compliant	<p>BRS maintain and operate all plant and equipment in a proper and efficient manner.</p> <p>AWE maintain site equipment e.g. conveyors. Sighted blank job sheets which are completed for any problems with equipment. These are sent to the AWE Service Manager, work is then done by AWE and signed off when finished. Sighted maintenance</p>

Number	Condition	Compliance	Audit Findings
			records for excavator SK135 500 hr service 3/05/2019.
O3 Dust			
O3.1	Activities at the premises must be carried out in a manner that minimises the generation of dust at the premises.	Compliant	BRS operate and maintain the premises to minimise the generation of dust.
O3.2	The premises must be maintained in a condition which prevents the emission of dust from the premises.		<p>BRS maintain a dust suppression system with sprinklers in the crushing shed and along the boundary fence. Boundary fence sprinklers operate for 30 seconds, every 5 minutes between 9 am and 9 pm. The crushing shed is enclosed and sprinklers are operated as required. These were both observed to be operational at the time of the inspection. Dust monitoring gauges are maintained around the site boundary, results from the dust gauges was not reviewed as part of the audit. There is no requirement to monitor dust and achieve specific criteria as part of EPL 20797.</p> <p>BRS also maintain a street sweeper and water cart, wash-down facilities, drive through wheel wash and hosing off material on the internal roadways into the site dirty water management system.</p> <p>The site is considered to have a good wheel-wash system in place including a drive-through wheel-wash and side sprinklers. All vehicles observed departing site at the time of the inspection were free of any sediments / debris.</p>
O3.3	Trucks entering and leaving the premise that are carrying loads must be covered at all times, except during loading and unloading.	Compliant	<p>All observed loads arriving and departing from site were observed to be covered, including a curtain system on truck and dogs.</p> <p>Improvement opportunity 8: Include the requirement to cover all loads in the driver induction material.</p>
O4 Other Operation Conditions			
O4.1	The licensee must minimise the tracking of waste, mud and other materials by vehicles leaving the premises.	Compliant	<p>Refer to Condition O3.1.</p> <p>No waste, mud or other materials was observed to be tracked onto the road by vehicles leaving the premises.</p>

Number	Condition	Compliance	Audit Findings
O4.2	The licensee must develop and implement an Erosion and Sediment Control Plan at all times whilst the licence is in-force. This plan must describe the measures that will be implemented to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction and operational activities. This plan should be prepared in accordance with the <i>Managing Urban Stormwater: Soils and Construction</i> (Vol. 1, 4th Edition) publication (or any revision) as well as any relevant addendums.	Non-compliant	<p>BRS do not have an erosion and sediment control plan in place.</p> <p>BRS are implementing a number of controls to minimise discharge of sediment and other pollutants to lands and/or waters. Erosion is not an issue as the facility is constructed on a hardstand.</p> <p>BRS advised that they were in the process of developing an erosion and sediment control plan using the site layout plan as a base.</p> <p>Corrective action 4: Develop an Erosion and Sediment Control Plan to document the controls installed and maintained on site and to confirm that they are in accordance with the BlueBook.</p>
O4.3	The licensee must undertake and complete an Air Quality Impact Assessment within 6 months from the date of issue of this licence to determine the impacts of activities undertaken at the premises in accordance with relevant guidelines.	Non-compliant	<p>The Air Quality Impact Assessment, required by Condition O4.3, was required to be completed prior to 06/12/2017. An air quality impact assessment was not completed prior to this date.</p> <p>It is noted however that an air quality impact assessment (AQIA) has been undertaken as part of the recently completed EIS, which quantified the impacts of the proposed expansion of operations against relevant guidelines. This AQIA concluded that the facility could operate without causing significant air quality impacts at sensitive receivers.</p> <p>BRS have not received any air-quality complaints.</p> <p>No further corrective actions are considered necessary to address this non-compliance.</p>
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.	Compliant	<p>BRS maintain monitoring records generally as required by Condition M1.</p> <p>Sighted monthly EPL reports of weights received.</p> <p>Four years of records were not available for review as</p>

Number	Condition	Compliance	Audit Findings
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.		the current owners of the facility have not been managing the site for four years. Sighted report for client for 6-13 June 2019. Including details of date, time, gross tare and net weight, company name and vehicle registration.
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.		BRS advised that the EPA have requested records during previous site inspections and these have been provided.
M2 Recording of pollution events			
M2.1	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.	Compliant	At the time of the audit, there were no formal complaints made and therefore the site does not have a complaints register in place. BRS's EMP makes reference to procedure 14-1-003 with regards to complaint management, this was not sighted as part of the audit. Improvement opportunity 9: Maintain a complaint form and register to demonstrate capacity to collect and maintain required information in the event of a complaint and its follow up.
M2.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Not applicable	Refer to Condition M2.1.
M2.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Not applicable	Refer to Condition M2.1.
M2.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Not applicable	Refer to Condition M2.1.
M3 Telephone complaints line			
M3.1	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.	Compliant	

Number	Condition	Compliance	Audit Findings
M3.2	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.		A check of the company website (and Facebook page) identified that appropriate details have been provided to allow complaints to be made. In addition, site contact details are provided at the front entrance of the site.
M3.3	The preceding two conditions do not apply until 1 month from the date of the issue of this licence.	Note	Note
Reporting Conditions			
R1 Annual return documents			
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. <p>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.</p>	Compliant	<p>BRS are completing and submitting annual returns to the EPA as required by Condition R1.</p> <p>Sighted Annual return 2017/18, dated 21 December 2018 which is prepared in the form provided by the EPA includes completed sections as required by condition R1.2.</p>
R1.2	<p>An Annual Return must be prepared in respect of each reporting period, except as provided below.</p> <p>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p>		
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <ol style="list-style-type: none"> a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. <p>Note: An application to transfer a licence must be made in the approved form for this purpose.</p>	Not applicable	The licence has not been transferred to a new licensee.

Number	Condition	Compliance	Audit Findings
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: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Not applicable	The licence is active and has not been surrendered or revoked.
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect <i>EPA</i> or 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').	Compliant	BRS has supplied annual returns to the EPA within the required timeframes. Two annual returns are listed on the POEO register against EPL 20797. Both were submitted within 60 days of the end of the reporting period.
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.	Compliant	BRS is maintaining copies of completed annual returns as required by Condition R1.6. Sighted copies of 2016/17 and 2017/18 annual returns.
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Compliant	BRS is having the annual return certified as required by Condition R1.7. Sighted signed copy of 2017/18 annual return by BRS Managing Director.
R2 Notification of environmental harm			
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555. 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.	Not triggered	No pollution events have occurred to trigger notification to the EPA.
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.	Not applicable	Refer to Condition R2.1.
R3 Written report			
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Not triggered	No written report has been requested by the EPA. The EPA has however conducted a site inspection following a report that the facility was accepting asbestos waste. WorkCover NSW records sighted (20/08/2018) which documented a joint site inspection with EPA regarding the reported asbestos issue. The

Number	Condition	Compliance	Audit Findings
			report concluded that the raised issue could not be substantiated. BRS advised that no further inspections or inquiries were requested by the EPA.
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.	Not triggered	Refer to Condition R3.1.
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Not triggered	Refer to Condition R3.1.
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.	Not triggered	No request has been made by the EPA to date.
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.	Compliant	BRS maintain copies of the EPL in a number of locations across the site in a 'site pack' with other management plans, etc. Copy of EPL included in site folder dated 6 July 2017.
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Not triggered	No request has been made by the EPA to date.
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Not triggered	None
Special Conditions			

Number	Condition	Compliance	Audit Findings
E1 Environmental obligations of licensee (works and programs)			
E1.1	<p>While the licensee's premises are being used for the purpose to which the licence relates, the licensee must:</p> <p>a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents.</p> <p>b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA.</p> <p>c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.</p>	Compliant	<p>BRS operate the facility in accordance with Condition E1.1.</p> <p>Spill kits were sighted across the site, site personnel were observed washing down hardstand areas into internal sump for reuse, and a street sweeper was operating to clean up hardstand areas.</p> <p>BRS maintain a rejected load procedure and register which defines what is required to be rejected – predominantly asbestos and oily water. Drivers found to be bringing unauthorised materials onto site are sent away with their entire load. A copy of the rejection notice goes with driver. BRS do not dispose of any wastes.</p> <p>Sighted copy of the rejected load notice including weighbridge ticket, volume of product, date and time, source of waste, vehicle registration, driver name, driver licence number and contact details. Form specifies that load should be taken to a facility that is licensed to accept that waste.</p> <p>BRS advised that the EPA has sighted the rejected load register but has not requested copies.</p>
E1.2	<p>In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must:</p> <p>a) make all efforts to contain all firewater on the licensee's premises,</p> <p>b) make all efforts to control air pollution from the licensee's premises,</p> <p>c) make all efforts to contain any discharge, spill or run-off from the licensee's premises,</p> <p>d) make all efforts to prevent flood water entering the licensee's premises,</p> <p>e) remediate and rehabilitate any exposed areas of soil and/or waste,</p> <p>f) lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of,</p> <p>g) at the request of the EPA monitor groundwater beneath the licensee's premises and its potential to migrate from the licensee's premises,</p> <p>h) at the request of the EPA monitor surface water leaving the licensee's premises; and</p> <p>i) ensure the licensee's premises is secure.</p>	Not triggered	<p>There have been no reported events that have triggered suspicion with regards to a pollution incident occurring or likely to have occurred.</p> <p>Section 13 of the EMP includes <i>Emergency Preparedness</i> and makes reference to an <i>Incident / Emergency Management Procedure</i>. In addition, a copy of the BRS Pollution Incident Response Management Plan (PIRMP) was sighted, revision date November 2018. It is noted that Section 13 of the PIRMP includes requirements with regards to staff training and inductions. Based on site records and observations, the training and induction requirements are not being implemented as per the PIRMP.</p> <p>Improvement opportunity 10: Two separate documents were referenced / observed with regards to incident and emergency management. Update EMP and associated documentation and</p>

Number	Condition	Compliance	Audit Findings
			<p>to clarify correct documentation to be implemented.</p> <p>Improvement opportunity 11: Review site processes with regards to training and induction and align with PIRMP. This may also require an update of the PIRMP to reflect actual site processes.</p>
E1.3	<p>After the licensee's premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must:</p> <p>a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; and</p> <p>b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination.</p>	Not triggered	The premises continues to be operated as intended under the EPL.
E2 Financial Assurance			
E2.1	A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as 'Authorised Deposit-taking Institutions' under the <i>Banking Act 1959</i> of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA.	Compliant	BRS maintain financial assurance as required by Condition E2.1.
E2.2	The financial assurance must be in favour of the Environment Protection Authority in the amount of one hundred thousand dollars (\$100,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. The licensee must provide to the EPA, along with the original counterpart guarantee, confirmation in writing that the financial institution providing the guarantee is subject to supervision by APRA.		Financial assurance documentation sighted, including a bank guarantee from Westpac Bank to the NSW EPA for the sum of \$100,000 dated September 2016, at the request of Bulk Recovery Solutions Pty Ltd.
E2.3	The financial assurance must be maintained during the operation of the facility and thereafter until such time as the EPA is satisfied the premises is environmentally secure.	Compliant	It is understood that the bank guarantee as detailed in response to Condition E2.1 remains current and active.
E2.4	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	Not triggered	BRS advised that the EPA has not requested an increase in the bank guarantee.
E2.5	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	Not triggered	BRS has maintained compliance with the conditions of EPL 20797.
E2.6	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder.	Not triggered	Replenishment of the bank guarantee had not been required to date.

Table 2 Project Approval Conditions – DA 948/2015/DA-I/B

Number	Condition	Compliance	Audit Findings								
General Conditions											
1	<p>Approved Development</p> <p>The development shall be carried out in accordance with the approved plans and documents listed in the table below, and all associated documentation supporting this consent, including the Environmental Impact Statement prepared by Benbow Environmental (141296_EIS_Rev2 April 2015, released 27 April 2015 and 161066_S96(2)_rev1 August 2016, released 18 August 2016) as well as additional information prepared by Benbow Environmental, except as modified in red by Council and / or any conditions within.</p> <table border="1"> <thead> <tr> <th>Plan/ Document No.</th><th>Version/ Revision</th><th>Prepared by</th><th>Date</th></tr> </thead> <tbody> <tr> <td>Figure 3.3 Site Plan, Ref: 161066_s96(2)_REV1 August 2016</td><td>Issue No.1</td><td>Benbow Environmental</td><td>August 2016</td></tr> </tbody> </table>	Plan/ Document No.	Version/ Revision	Prepared by	Date	Figure 3.3 Site Plan, Ref: 161066_s96(2)_REV1 August 2016	Issue No.1	Benbow Environmental	August 2016	Compliant	The development as reviewed as part of this audit, is generally consistent with that outlined in Benbow Environmental (2015). A copy of 161066_S96(2) was not reviewed as part of the audit. Some changes to operations have occurred including outside storage of materials.
Plan/ Document No.	Version/ Revision	Prepared by	Date								
Figure 3.3 Site Plan, Ref: 161066_s96(2)_REV1 August 2016	Issue No.1	Benbow Environmental	August 2016								
2	<p>General Terms of Approval – NSW Environmental Protection Authority</p> <p>The General Terms of Approval issued by the NSW Environment Protection Authority (EPA) for the subject application, Notice Number 1534260, Attachments A and B, attached to this development consent shall be read in conjunction with the conditions contained herein.</p>	Note	Refer to Table 1 EPL 20797 Conditions.								
3	<p>Building Code of Australia</p> <p>All building work must be carried out in accordance with the provisions of the <i>Building Code of Australia</i>. In this clause, a reference to the <i>Building Code of Australia</i> is a reference to that Code as in force on the date the application for the relevant construction certificate is made.</p>	Not triggered	No building work has been undertaken by BRS in relation to DA 948/2015/DA-I/B.								
4	<p>Landscaping</p> <p>Landscaping across the site shall be maintained in good order, regularly watered and fertilised in accordance with best practice guidelines for maintaining the health and vigour of the vegetation.</p> <p>Dead or dying trees and shrubs shall be replaced.</p> <p>The landscaping must be installed so as not to interfere with the drainage easements that burden the property.</p> <p>Land shall be provided on the site in accordance with the drawing titled 'Landscape' prepared by Landscape Garden service OWN No/Issue LC 06 4, drawn by Stephen Clancy dated 12.01.2007, except that trees identified as T3, T4, T6 and T7 shall be replaced by</p>	Compliant	<p>BRS maintain landscaping across the site in good health in accordance with Condition 4.</p> <p>An irrigation system was observed that BRS advised uses recycled water from site. Vegetation was observed to be in good health with no gaps in vegetation indicating that dead trees and shrubs were replaced.</p> <p>Copies of the landscape plan were not available for review at the time of audit. BRS did not own the site at the time of their preparation.</p>								

Number	Condition	Compliance	Audit Findings
General Conditions			
	<p>local species melaleuca decora, eucalyptus amplifolia, and eucalyptus baueriana and the 'tube stock planting detail' is amended by deleting the subsoil drainage system.</p> <p>This landscaping scheme is consistent with development consent 336/2006/DA-DE approved by the Land and Environment Court.</p>		
5	<p>Volumes of Acceptable Waste</p> <p>The volumes and materials of acceptable waste at the site are as follows:</p> <p>*The processing of up to 30,000 tonnes per annum of approved materials; *The storage on site at any given time to be up to 5000 tonnes of approved waste.</p> <p>Records of the mass of waste accepted at the site for processing shall be kept and made available to Council and the NSW EPA for inspection upon request.</p> <p>This consent does not permit the acceptance, processing and storage of friable and non-friable asbestos-containing materials on the site at any time</p>	Compliant	Refer to EPL 20797 Condition. L2.1
6	<p>Deliveries</p> <p>Vehicles servicing the site shall comply with the following requirements: a_All vehicular entries and exits shall be made in a forward direction. b_All vehicles awaiting loading, unloading or servicing shall be parked on site and not on adjacent or nearby public roads. c_All deliveries to the premises shall be made to the loading bay/s provided.</p> <p>A traffic sign shall be placed adjacent to the driveway at the entrance of the property advising drivers of the above information. Should the sign be damaged or removed, it shall be replaced within 48 hours.</p>	Compliant	<p>BRS maintain traffic movement on site in accordance with Condition 6.</p> <p>Trucks were observed on site all moving in a forward direction. All trucks, once on site, remain on site while awaiting unloading/loading. Deliveries were observed to be made to the unloading bays provided.</p> <p>Signage at the entrance to the facility specified that traffic movements on the weighbridge were one way, signage throughout the facility specified that traffic movements were one way and that trucks must exit through the wheel wash. All unloading points were signposted.</p>
7	<p>Advertising Signs – Separate DA Required</p> <p>This consent does not permit the erection or display of any advertising signs.</p> <p>Most advertising signs or structures require development consent. You should make separate enquiries with Council prior to erecting or displaying any advertising or signage.</p>	Not applicable	Signage erected at entry to facility only identifies the facility name and ownership and does not constitute advertising signage.
8	Approved Storage of Goods	Compliant	Refer to EPL Condition L2.

Number	Condition	Compliance	Audit Findings
General Conditions			
	All approved works, storage and display of goods, materials and any other item associated with the approved development must only be undertaken in accordance with the approved plans and documentation referred to in Condition 1.		
9	<p>Bund Wall</p> <p>A bund wall shall be constructed around all work and liquid storage areas to prevent any spillage entering into the stormwater system. The bunded area shall provide a volume equal to 110% of the largest container stored and graded to a blind sump so as to facilitate emptying and cleansing.</p>	Compliant	BRS maintain a sump under the filter presses that is approximately 500,000 litres. All dirty water generated on site drains to the sump. While some work and liquid storage areas are not separately bunded e.g. concrete washout tank, any spills from these areas drain to the sump for treatment and reuse on site.
10	<p>Storage of Flammable and Combustible Liquids</p> <p>Flammable and combustible liquids shall be stored in accordance with <i>Australian Standard 1940-(as amended) – The Storage and Handling of Flammable and Combustible Liquids</i>.</p>	Non-compliant	<p>BRS maintain a range of flammable and combustible liquids across the facility. The majority of these are stored in accordance with AS 1940 however some hydraulic drums were not bunded or placarded and there was no bunding for the flammable storage container.</p> <p>Hydraulic oil in drums were observed in a designated area of the crushing shed. Bunding was available however the drums were not on the bunds. There was no placarding in this area indicating the materials stored.</p> <p>. The flammable storage container was locked and not able to be inspected at the time of audit. External placarding on the container indicated that it contained flammable liquids and corrosive substances. A photo of the inside of the container was provided following the audit. Tins and drums were stored on the floor and on shelving inside the container. It was not clear whether the container is bunded, there was no additional bunding provided inside the container.</p> <p>A diesel fuel bowser is maintained on site, it is understood to be a self bunded fuel container. It was placarded with combustible liquid and to not have ignition sources near it.</p>

Number	Condition	Compliance	Audit Findings
General Conditions			
			<p>Spill kits were available across the site. Two were not placarded.</p> <p>SDSs were not maintained at the storage location in all instances.</p> <p>Corrective action 5: Store all flammable and combustible liquids in accordance with AS 1940.</p>
11	<p>Storage of Dangerous Goods</p> <p>Prior to the storage of any 'dangerous goods' on the premises, a licence from the Chemical Safety Branch of Work Cover shall be obtained and submitted to Council.</p>	Not triggered	BRS may store minor quantities of dangerous goods in the form of cleaning chemicals on site, these do not require a licence from WorkCover.
12	<p>Graffiti Removal</p> <p>In accordance with the environmental maintenance objectives of 'Crime Prevention Through Environmental Design', the owner/lessee of the building shall be responsible for the removal of any graffiti which appears on the buildings, fences, signs and other surfaces of the property within 48 hours of its application.</p>	Compliant	<p>BRS advised that they have a program of regular removal of graffiti completed by site personnel completed within 48 hrs.</p> <p>Sighted the acoustic barrier behind the storage bays painted in an anti-graffiti finish. There was no graffiti across the site at the time of inspection.</p>
13	<p>Unreasonable Noise, Dust and Vibration</p> <p>The development, including operation of vehicles, shall be conducted so as to avoid the generation of unreasonable noise, dust or vibration and cause no interference to adjoining or nearby occupants. Special precautions must be taken to avoid nuisance in neighbouring residential areas, particularly from machinery, vehicles, warning sirens, public address systems and the like.</p> <p>In the event of a noise related issue arising during construction, the person in charge of the premises shall when instructed by Council, cause to be carried out an acoustic investigation by an appropriate acoustical consultant and submit the results to Council. If required by Council, the person in charge of the premises shall implement any or all of the recommendations of the consultant and any additional requirements of Council to its satisfaction.</p>	Compliant	<p>Refer to EPL Conditions L3 and O3.</p> <p>An acoustic investigation has not been triggered as required by Condition 13.</p>
14	<p>Engineering Design Works</p> <p>The design of all engineering works shall be carried out in accordance with the requirements set out in the Campbelltown (Sustainable City) DCP - Volumes 1 and 3 (as amended).</p>	Not triggered	No specific design for engineering works has been carried out.
15	<p>Operating Hours</p> <p>The use of the premises/business shall be limited to:</p>	Non-compliant	Refer to EPL Condition L4.2 and Condition 13 above.

Number	Condition	Compliance	Audit Findings
General Conditions			
	<p>Monday to Friday 7.00 am – 10.00 pm</p> <p>Saturday 7.00 am – 6.00 pm</p> <p>Sunday 7.00 am – 6.00 pm</p> <p>Public Holiday Closed</p> <p>Three drum filters and one forklift can operate up to 24 hours a day, 7 days per week subject to their use being consistent with the NSW Industrial Noise Policy and impact on nearby residential areas.</p> <p>In the event of noise related complaints during operation of the drum filters, forklifts or general site activities, the person or organisation having benefit of this development consent (applicant) shall when instructed by Council, cause to be carried out an acoustic investigation by a suitably qualified and experienced acoustic consultant and submit the results for consideration and peer review if deemed necessary by Council.</p> <p>If required, the applicant shall undertake and implement the necessary recommendations of the consultant or the Council to the satisfaction of the consent authority.</p>		
16	<p>Car Parking Spaces</p> <p>All car parking spaces shall be designed, sealed, line marked and made available to all users of the site in accordance with Australian Standards 2890.1 and 2 (as amended).</p>	Compliant.	<p>BRS maintain 25 car parking spaces on site.</p> <p>Sighted car parking spaces sealed, line marked and made available to users of the site. The specific requirements of the AS 2890 were not reviewed.</p>
17	<p>External Areas</p> <p>The operator of the site shall ensure that all external areas are kept in a clean condition with no buildup of sediment or waste product materials. In particular, the operator shall ensure that any sediment or waste lost during arrival/departure of vehicles from the site is cleaned in a timely manner and not allowed to enter the stormwater system to ensure no adverse impacts on the stormwater system.</p>	Compliant	<p>BRS generally maintain the external areas in a clean condition through regular removal of sediment and waste product materials. No sediment or waste was observed to be lost during arrival/departure of vehicles from the site.</p> <p>BRS personnel were observed to be regular cleaning up actively trafficked areas of the site. The area between the product storage bays was observed to have material spread across the roadway. BRS advised that this would be cleaned up at the end of the day. There was no risk of this material entering the stormwater system.</p>

Number	Condition	Compliance	Audit Findings
General Conditions			
			Improvement opportunity 12: Implement measures to prevent the spread of material from the storage bays across the roadway.
18	<p>Waste Water</p> <p>The operator of the site shall ensure that no waste water is discharged into either sewer or the stormwater system. Should waste water be required to be discharged in to the sewer system, all applicable permits shall be obtained from Sydney Water, including a Trade Waste Agreement.</p>	Compliant	<p>BRS have a Trade Waste Agreement obtained from Sydney Water – Consent Number: 38498 (29/03/2018).</p> <p>BRS advised that they undertake periodic sampling of wastewater discharged through the trade waste agreement to check compliance with water quality limits, and that Sydney Water come to site and conduct monitoring as well. The monitoring/sample point was observed.</p> <p>Compliance with the Sydney Water Trade Waste Agreement was not assessed in any further detail.</p>
19	<p>Drainage Easement</p> <p>The applicant shall re-form and finish the easements to drain water that burden the property in accordance with the restrictions on the land registered pursuant to Section 88B of the <i>Conveyancing Act 1919</i>.</p>	Not verified	<p>A drainage easement exists along north eastern boundary of the property. This area is hardstand and drains to the existing stormwater inlets.</p> <p>The form and finish of the easement was not assessed against the requirements of the <i>Conveyancing Act</i>.</p>
20	<p>Completion of Constructions Works</p> <p>Unless otherwise specified in this consent, all construction works associated with the approved development shall be completed within 12 months of the date of the notice of the intention to commence construction works under Section 81A of the Act.</p> <p>In the event that construction works are not continually ongoing, the applicant shall appropriately screen the construction site from public view with architectural devices and landscaping to Council's written satisfaction.</p>	Not verified	<p>Any construction works associated with DA 948/2015/DA-I/B have been completed. It was not verified at the time of audit whether these works were undertaken within 12 months of the date of the notice to commence construction.</p>

Table 3 Project Approval Conditions – F491/2002

Number	Condition	Compliance	Audit Findings
Schedule B			
Inspection – Building Works			
1	PIER HOLES - The pier holes before they are filled with concrete.	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
2	STEELWORK - The steelwork when in position and before concrete is poured. (Footings, lintels, beams, columns, floors, walls, swimming pools or like).		
3	WET AREA - The wet area damp-proofing and flashing before covering		
4	RAINWATER DRAINS - The rainwater drainage lines within the property boundaries when completed and before covering		
5	FINAL - The development is completed and before occupation or use is commenced. This shall include the issuing of a fire safety certificate in accordance with Part 9 Divisions 1 to 8 of the Environmental Planning and Assessment Regulations, 2000		
Inspection – Civil Works			
6	EROSION AND SEDIMENT CONTROL - (1) direction/confirmation of required measures (2) after installation and prior to commencement of earthworks (3) as necessary until completion of work	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
7	STORMWATER PIPES - Laid and jointed prior to backfill		
8	CONCRETE PATHS, CYCLEWAYS, VEHICLE CROSSINGS OR LAYBACKS - Prior to pouring concrete		
9	FINAL INSPECTION - All outstanding works		
The Site			
10	<p>PREScribed CONDITIONS - For the purposes of section 80A(11) of the Act, the following conditions are prescribed in relation to this development</p> <p>(a) that the work (other than work relating to the erection of a temporary building) must be carried out in accordance with the provisions of the Building Code of Australia (as in force on the date the application for the relevant construction certificate was made).</p> <p>(b) in the case of residential building work for which the Home Building Act 1989 requires there to be a contract of insurance in force in accordance with Part 6 of that Act, that such a contract of insurance is in force.</p> <p>This condition does not apply to the extent to which an exemption is in force under clause 187 or 188, subject to the terms of any condition or requirement referred to in clause 187(6) or 188(4)</p>	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
11	PUBLIC PROPERTY - The applicant or the applicant's agent shall advise Council of any damage to property controlled by Council which adjoins the site including kerbs, gutters, footpaths, walkways, reserves and the like, prior to commencement of any work on the site. Failure to identify existing		

Number	Condition	Compliance	Audit Findings
Schedule B			
	damage will result in all damage detected after completion of the building work being repaired at the applicant's expense.		
	The kerb, gutter and footpath adjoining the site shall be kept clear of soil and debris during the course of construction. Should clearing of the kerb and gutter be necessary, the work will be completed by Council at the applicant's expense. (To ensure adequate protection of Council assets)		
12	HOARDING - The site shall be enclosed with a suitable hoarding or security fence to prevent access by the public in accordance with the requirements of Workcover. Appropriate signs regarding unauthorised entry, builder's name and contact phone numbers shall be displayed. (Environmental Planning and Assessment Act)		
The Development			
13	COMPLIANCE CERTIFICATE -A compliance certificate shall be issued certifying that the development has complied with all the conditions of development consent prior to the use or occupation. (To ensure all conditions of consent have been complied with)		
14	COMPLIANCE CERTIFICATES - Compliance Certificates (or reports from a Company or individual professionally experienced and qualified to give that evidence and containing documented authoritative evidence of compliance with the specifications, drawings, and development conditions) shall be obtained for the following prior to issue of the occupation Certificate: <ul style="list-style-type: none"> • Service Authority Clearance - prior to placement of vehicle crossing construction. • Road Restoration Clearance - from Council. • Work as Executed Plan for overland flow path and finished floor/surface levels. • Conditions of Development Consent • Two collated copies of any related plans, documents, reports, forms or other evidence shall accompany the above documents 	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
15	LANDSCAPING PLAN - The development site shall be landscaped and maintained with lawns and advanced shrubs and trees in accordance with Plan No. L01. drawn by Landscape Plan dated May 2002. Any change to this plan shall be submitted to the consent authority for approval prior to issuing of a Construction Certificate	Compliant	DA 948/2015/DA-I/B Condition 4.
16	LANDSCAPING BOND - A cash bond or bank guarantee for the sum of \$5,000.00 is to be lodged with the consent authority to ensure the effective establishment and maintenance of landscaping. The bond or guarantee is to be lodged with consent authority prior to the issuing of a Construction Certificate and will be returned on the following basis: <p>50% on completion of landscaping in accordance with the approved plans;</p> <p>25% six months after the completion date of the landscaping, subject to the consent authority being satisfied that the maintenance program is proceeding satisfactorily; 25% residue to be refunded twelve months after completion, subject to satisfactory maintenance of the landscape area</p>	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
17	DESIGN AND INVESTIGATION BY COUNCIL - Where Council design and/or investigation is required for any works necessitated by the development, costs shall be met by the developer (Applied to ensure that the land or building will be developed in a way which will minimise impact on the local environment and achieve the objectives of the relevant Planning Instruments)		

Number	Condition	Compliance	Audit Findings
Schedule B			
18	FOOTPATH & VEHICULAR CROSSING LEVELS - Footpath and vehicular crossing levels are to be obtained from Council prior to the commencement of work. In this regard, an application should be lodged with Council on the prescribed form. (Applied to ensure that the land and or building will be developed in a way which will minimise impact on the local environment and achieve the objectives of the relevant Planning Instruments)	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
19	CIVIL WORKS - A final engineering inspection and clearance by Council is required for all civil works associated with the development prior to release of the Subdivision/Occupation Certificate. (Applied to ensure that the land and/or building will be developed in a way which will minimise impact on the local environment and achieve the objectives of the relevant Planning instruments.)		
20	POLLUTION WARNING SIGN - Council's sign issued with the Development Consent, promoting the protection of our waterways, must be displayed on the most prominent point of the building site that is visible to both the street and the site workers. The sign must be erected on site prior to work commencing and maintained for the duration of work on the site. NOTE: The sign will be provided by Council free of charge, however if lost or destroyed, it must be replaced at the cost of the applicant. (To ensure compliance with Campbelltown DCP No.112 - Erosion and Sediment Control)		
21	EROSION & SEDIMENT CONTROL - Erosion and sediment control measures shall be provided in accordance with the requirements of the Department of Housing 1998 Manual 'Managing Urban Stormwater - Soils & Construction', the approved plans, Council specifications and to the satisfaction of the Principal Certifying Authority. Approved measures shall be implemented prior to commencement and maintained during construction and until all disturbed areas have been revegetated and established to the satisfaction of the Principal Certifying Authority. (Applied to ensure that the land or building will be developed in a way which will minimise impact on the local environment and achieve the objectives of the relevant Planning Instruments.)		
22	WORK ON PUBLIC LAND - No work shall be undertaken within public lands without the prior written consent of Council. The applicant is to liaise with Council prior to commencing design works, and Council's approval of design plans and consent in writing for the work on public land shall be obtained prior to issue of the Construction Certificate. All inspections, approval and restoration of such work shall be undertaken at the applicant's expense unless otherwise approved in writing. (Applied to ensure that the land and or building will be developed in a way which will minimise impact on the local environment and achieve the objectives of the relevant Planning Instruments)		
23	PUBLIC SAFETY - Any works undertaken in a public place are to be maintained in a safe condition at all times. In this regard, the applicant shall ensure that a safe fully signposted passage minimum 1.2 metres wide, separated from the works and moving vehicles by suitable barriers and lights, is maintained for pedestrians at all times and that traffic control is undertaken and maintained strictly in accordance with AS 1742.3 (1996), the requirements set out in the RTA manual "Traffic Control at Work Sites" 1998, all applicable Traffic Management and Control Plans and that any Work Cover Authority requirements are met. Council may at any time and without prior notification make safe any such works Council considers to be unsafe, and recover all reasonable costs incurred from the		

Number	Condition	Compliance	Audit Findings
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	applicant. (Applied to ensure that the land and/or building will be developed in a way which will minimise impact on the local environment and achieve the objectives of the relevant Planning Instruments.)		
24	APPROVED PLANS & DOCUMENTATION - The development shall be carried out generally in accordance with submitted plans Drainage Concept Plan 75771.01.M01, dated 22 April 2002, Drawing No. A102 Revision B dated May 2002, Drawing No. A101 dated May 2002 prepared by Lean & Hayward, Landscape Plan L01 dated May 2002 prepared by HLS Pty Ltd and associated documentation including Traffic Assessment prepared by Transport & Urban Planning and Statement of Environmental Effects prepared by Lean & Hayward Pty Ltd dated 6 June 2002 submitted with the application, except where varied by the following conditions of consent.		
25	DISABILITY DISCRIMINATION ACT - Your attention is drawn to the existence of the Disability Discrimination Act. A Construction Certificate is required to be obtained for the proposed building which will provide consideration under the Building Code of Australia, however, the application may not comply with the requirements of the Disability Discrimination Act. This is the sole responsibility of the owner, builder and developer. (Disability Discrimination Act)		
Construction			
26	STRUCTURAL ENGINEERING DETAILS - No building work shall commence until details prepared by a practising structural engineer have been submitted to and approved by Council or an Accredited person for the concrete piers, floors, panels and structural steelwork. (To ensure the structural adequacy of the building and compliance with the Building Code of Australia)	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
27	CONSTRUCTION CERTIFICATE - This development consent relates to the erection of two storey office and workshop. In this regard construction work shall not commence until a Construction Certificate has been issued		
28	DETAILS TO BE SUBMITTED WITH THE CONSTRUCTION CERTIFICATE - The applicant is advised that the following details of compliance with the provisions of the Building Code of Australia and relevant standards of construction should be submitted with the application for a Construction Certificate: <ul style="list-style-type: none"> • Disabled persons access including: • tactile ground surface indicators; • A disabled persons toilet layout that is fully dimensioned; • Ramp gradients • A full plan layout of all required essential services. • Amended plans showing the main entry door swinging in the direction of egress. • Waste Management Plan • 		

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Road Construction			
29	<p>COMPLIANCE WITH COUNCIL SPECIFICATIONS - All design and construction work, lots and roads created shall be in accordance with Council's current standards and requirements as follows:-</p> <p>Guidelines of Engineering Conditions to be Applied to a Development and Building Applications (as amended)</p> <p>Stormwater Management Policy (as amended)</p> <p>'Managing Urban Stormwater - Soils & Construction', Department of Housing 1998 manual</p> <p>All relevant Australian and State Standards and publications.</p> <p>(Applied to ensure that adequate and safe public access is provided to the site for both pedestrian and vehicular traffic in accordance with Council's adopted Development Control Plans.)</p>	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
30	<p>FOOTPATH - The footpath adjoining the subject land shall be regraded, topsoiled and turfed in accordance with levels to be obtained from Council. Footpath formation shall be carried beyond the boundary to provide an acceptable transition to existing footpath levels. (Applied to ensure that adequate and safe public access is provided to the site for both pedestrian and vehicular traffic in accordance with Council's adopted Development Control Plans.)</p>		
31	<p>VEHICULAR CROSSINGS - Full width concrete vehicular crossings shall be constructed to all entrances and exits in accordance with Council's Vehicle Crossing Specification. A separate application for this work, which will be subject to a crossing inspection fee, fixing levels and inspections by Council must be lodged with Council. Conduits shall be provided under crossings to Service Authority's requirements and Service Authority clearances obtained. (Applied to ensure that adequate and safe public access is provided to the site for both pedestrian and vehicular traffic in accordance with Council's adopted Development Control Plans.)</p>		
32	<p>RESTORATION OF PUBLIC ROADS - Restoration of public road and associated works required as a result of the development shall be carried out by Council and all costs shall be paid by the applicant to Council prior to release of the occupation Certificate. (Applied to ensure that adequate and safe public access is provided to the site for both pedestrian and vehicular traffic in accordance with Council's adopted Development Control Plans.)</p>		
33	<p>PUBLIC UTILITIES - Adjustments to public utilities caused by the development shall be completed prior to occupation and all costs shall be paid by the applicant. (Applied to ensure that adequate and safe public access is provided to the site for both pedestrian and vehicular traffic in accordance with Council's adopted Development Control Plans.)</p>		

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Stormwater Drainage and Flood Management			
34	STORMWATER DETAILS -A plan indicating all engineering details and calculations relevant to site regrading and the collection and disposal of stormwater from the site, building/s and adjacent catchment, shall be submitted for approval with the Construction Certificate application. Floor levels of all buildings shall be above finished site levels and stormwater shall be conveyed from the site to the nearest pipe drainage system. All proposals shall comply with Council's Stormwater Management Policy. (Applied to ensure that stormwater drainage collected on or passing through the site is conveyed through a controlled system to prevent damage and nuisance to the subject land and adjacent lands and minimise flood impact.)	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
35	FLOOR LEVELS - The land has been identified as being affected by Council's Stormwater Management Policy. The floor level of any building to be erected on site shall be to a minimum level of RL25.20 metres AHO. (Applied to ensure that stormwater drainage collected on or passing through the site is conveyed through a controlled system to prevent damage and nuisance to the subject land and adjacent lands and minimise flood impact.)		
36	FINISHED GROUND LEVEL -The land has been identified as being affected by the 1:100 year flood. The finished ground level of the site shall be a minimum level of RL24.70 metres AHD. A contour plan showing existing levels and prepared by a registered surveyor shall be lodged with the Construction Certificate application. (Applied to ensure that stormwater drainage collected on or passing through the site is conveyed through a controlled system to prevent damage and nuisance to the subject land and adjacent lands and minimise flood impact.)		
37	DAMAGE PREVENTION - The site has been identified as being at risk from a 1:100 year flood. The applicant shall liaise with Council to define the 1:100 year flood level as it affects these premises and shall take reasonable action to minimise damage to goods or equipment or other property stored in the premises in the event of floodwaters entering the premises. (Applied to ensure that stormwater drainage collected on or passing through the site is conveyed through a controlled system to prevent damage and nuisance to the subject land and adjacent lands and minimise flood impact.)		
38	REGISTRATION OF LEVELS - On completion of the development, the floor and/or finished surface levels shall be certified by a registered surveyor as complying with this development consent prior to issuing of the Occupation Certificate. (Applied to ensure that stormwater drainage collected on or passing through the site is conveyed through a controlled system to prevent damage and nuisance to the subject land and adjacent lands and minimise flood impact.)		

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39	OVERLAND FLOW PATH - The property is affected by a 30 metre wide drainage easement. This easement is required to discharge overland flow from 1 in 100 year storm. The area within the easement shall not be used for the storage of materials which would obstruct the flow of stormwater. Car parking areas and kerbing within the easement shall be constructed to conform with the design profile of the flow path. The boundary fences should have sufficient gap to allow unobstructed flow in the overland flow path. In this regard, the applicant shall liaise with Council regarding detailed design of this area prior to release of the Construction Certificate. (Applied to ensure that stormwater drainage collected on or passing through the site is conveyed through a controlled system to prevent damage and nuisance to the subject lands and minimise flood impact.)	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
40	HYDRAULICS ENGINEER - An experienced Hydraulics Engineer is to be engaged with the appropriate NPER registration to undertake a flood analysis to determine the extent of flood affectation. Details are to be submitted to Council's Director Environment and Planning prior to the release of the Construction Certificate.		
Off Street Car Parking and Vehicular Servicing			
41	CAR PARKING SPACES - Twenty Five (25) off-street car parking spaces, and twenty (20) truck parking spaces including access driveways, are to be constructed on the site in accordance with the submitted plans. Two (2) car parking spaces for disabled persons shall be provided as part of this total requirement, having dimensions of 3.2 metres, if adjoining another car space increasing up to 3.7 metres in width if immediately adjoining a wall x 5.5 metres and be distinctly signposted. A kerb ramp shall be provided to any raised walkways servicing the car park convenient to the disabled persons car parking space. Engineering details for the construction of these areas shall be lodged for approval with the Construction Certificate.	Not applicable	This condition has been superseded by DA948/2015/DA-I/B Condition 16.
42	ENTRANCE SIGN - An approved sign shall be erected at the entrance of the site stating, "All vehicles entering or leaving the site must be driven in a forward direction". (Council's Car Parking Policy)	Compliant	Refer to DA 948/2015/DA-I/B, Condition 6.
Services			
43	INTEGRAL ENERGY CLEARANCE - The developer shall submit to Council a letter from Integral Energy stating that all its requirements and any conditions of this consent have been satisfied prior to release of the occupation Certificate. Application shall be made to 'Contestable Works, Network Projects, Integral Energy, PO Box 6366, Blacktown 2148'	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
44	SYDNEY WATER CLEARANCE - The developer must obtain a Section 73 Compliance Certificate under the Sydney Water Act 1994 from Sydney Water stating that satisfactory arrangements have been made with Sydney Water for the amplification and/or reticulation of water and sewerage services to the land. To obtain the Section 73 Certificate, Sydney Water may require you to construct works and/or pay developer charges. Application must be made through an authorised Water Servicing Coordinator, for details see the Sydney Water web site www.sydnewwater.com.au/customer/urban/index or telephone 132 092.		

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	<p>Sydney Water's Notice of Requirements must be obtained prior to release of the Construction Certificate. This is to avoid problems in servicing your development and adverse impacts on lot layout or the design of buildings and associated facilities, particularly driveways and landscaping. Please make early contact with the Coordinator to ensure these matters are addressed.</p> <p>The final Section 73 Certificate must be provided to the Principal Certifying Authority prior to issue of the occupation Certificate</p>		
45	SYDNEY WATER APPROVAL - The stamped building plans must be submitted to the appropriate Sydney Water office to determine whether the development will affect Sydney's Water sewer and water mains, stormwater drains and/or easements. If the development complies with Sydney Water's requirements, the building plans will be stamped indicating that no further requirements are necessary.		
46	TELSTRA - The applicant is advised to contact Telstra to satisfy its requirements in relation to services to the proposed development, particularly the provision of conduit and cabling for telecommunications services.		
47	OPTUS - The applicant is advised to contact Optus to satisfy any of its requirements in relation to the proposed development, particularly the relocation of any existing services. (Ph: 9837 9010 Fax: 9837 9060)		
Land Use			
48	The site shall not be used for the purposes of receiving, storing and or processing waste demolition or any other materials at any time.	Compliant	Refer to EPL 20797 Condition L2.1.
49	The site shall not be used for the purposes of storing, loading, unloading and parking trucks, truck trailers, other vehicles and machinery including excavating equipment prior to the issue of the Occupation Certificate for this development	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
50	All Shipping containers and portable office/buildings shall not be stored upon the premises at any time.		
51	The external equipment storage areas shall be used for the purpose of storing equipment awaiting maintenance and allocation to projects. Storage of other materials within this area is not permitted		
52	CAR PARKING SPACES - Off-street car parking spaces and access driveways shall be made available at all times and maintained in accordance with the approved parking plans. (Environmental Planning and Assessment Act)		
53	LANDSCAPED AREA - The landscaped area shall be maintained in accordance with the approved landscape plan. (Environmental Planning and Assessment Act)	Compliant	Refer to DA 948/2015/DA-I/B Condition 4.

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54	LOADING/UNLOADING - All vehicles being loaded and/or unloaded are to stand entirely on the premises. (Environmental Planning and Assessment Act)	Compliant	Refer to DA 948/2015/DA-I/B Condition 6.
55	VEHICLE REPAIRS - No vehicles being repaired or waiting to be repaired are to stand on the street. (Environmental Planning and Assessment Act)	Not applicable	The site no longer contains a mechanical workshop. All maintenance of plant and equipment is undertaken offsite by a contractor.
56	AMENITY - The development is to be conducted in a manner to ensure that the environment of the surrounding locality is not adversely affected, disturbed or disrupted. Disturbance or disruption of the surrounding environment includes social effects outside the premises such as the generation of large congregations of people, vandalism, violence, excessive noise or the like. (Environmental Planning and Assessment Act)	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
57	The outdoor storage area is to be adequately screened (1800 high concrete wall enclosure) and goods and materials stored within shall not be stacked higher than the screening structure as indicated upon the submitted plans	Compliant	The outdoor storage area was observed to be set against the acoustic wall. No goods or materials were stacked higher than the wall.
58	All mechanical repair works are to be carried out wholly within the building	Not applicable	The site no longer contains a mechanical workshop. All maintenance of plant and equipment is undertaken offsite by a contractor.
59	HOURS OF OPERATION - The premises shall operate as follows; a). 6 am to 6 pm Monday to Friday; b). 7am to 4 pm Saturdays No operation of the premises is to occur on Sundays and/or Public Holidays.	Not applicable	This condition has been superseded by EPL 20797 Condition L4.2.
Essential Services			
60	FIRE SAFETY CERTIFICATE - On completion of the building work, the owner of the building shall provide documentary evidence to the accredited certifier or Principal Certifying Authority from a competent person to enable the issue of a fire safety certificate with respect to each essential service nominated in the schedule below.	Not verified	The building works associated with DA F491/2002 were completed by the previous owner. These works have not been included in the scope of this audit as documentation is not available to review.
Pollution Control Storage and Handling of Liquid/Chemicals			
61	LIQUID STORAGE - All above ground liquid storage, including wastes, shall be contained in a bunded area. The bunded area must be under cover, constructed of impervious materials and: For above ground tanks - the bund shall be able to contain at least 110% of the volume of the tank or the largest tank where a group of tanks are enclosed. Walls shall be at least 250mm in height. For drums – the bunded area shall be able to contain 25% of the total volume to be stored and have a minimum capacity of at least 400L. Bunds shall be at least 250mm in height.	Non-compliant	Refer to DA 948/2015DA-I/B Condition 10.
62	WASH BAY - Washing and degreasing of motor vehicles and vehicle parts shall be carried out in a bunded and covered wash bay. Waste water shall be pre-treated and disposed of to the sewer in	Not applicable	

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	accordance with a trade waste licence issued by Sydney Water or stored in a roofed, bunded area and collected by a NSW Environment Protection Authority licensed waste contractor.		
63	PARTS WASHING - Parts washing with solvents shall be carried out in a bunded and covered area to contain any spillage or leakage. Used solvents shall be separated from other wastes to assist in recycling of the material. Solvents shall be stored separately in a bunded and covered area and collected by an EPA licensed contractor for recycling or disposed to an approved waste facility.		The site no longer contains a mechanical workshop. All maintenance of plant and equipment is undertaken offsite by a contractor.
64	RADIATOR COOLANT - Radiator coolant shall be pre-treated and disposed of to the sewer in accordance with a trade waste licence issued by Sydney Water or stored in a roofed, bunded area, collected by an EPA licensed contractor and disposed of to an approved waste facility		
65	STORMWATER - No activities shall be carried out in an area which may allow pollutants to enter the stormwater system.	Compliant	
66	SPILL MANAGEMENT - A Spill Management Plan outlining the procedure to be followed when responding to a pollution incident shall be submitted to Council prior to occupation of the premises. A spill clean up kit containing dry cleaning materials, pollution booms, absorbents etc shall be kept on the premises at all times	Not applicable	These conditions have been superseded by the conditions in EPL 20797.
67	SPILL MANAGEMENT - If a spill occurs that threatens or harms the environment, you must tell the EPA or Council as soon as you become aware of it, in accordance with the Protection of the Environment Operations Act, 1997. For large-scale hazardous spills, call the Fire Brigade immediately on 000. For small scale spills, stop the source of the spill immediately, prevent it from entering the stormwater drains and clean it up if it is safe to do so, (follow the material Safety Data Sheet for the spilled substance)		
68	AIR POLLUTION - No activities shall be carried out in an area which may allow pollutants to enter the atmosphere	Compliant	Refer to EPL 20797 Condition O3.
69	NOISE CONTROL Hours of Operation - Construction work on site shall occur between the following hours: Monday to Friday 7am to 6pm Saturday 8am to 1pm Sunday and Public Holidays No work Sound Pressure Levels -sound pressure levels measured as LA10 15 minute emanating from the site must not exceed the background levels at the nearest affected residence by the following criteria for the time interval specified: 20dB(A) period up to 4 weeks 10dB(A) period greater than 4 weeks and not exceeding 26 weeks 5dB(A) period exceeding 26 weeks	Not applicable	The approved construction hours have been superseded by EPL 20797 Condition L4.1. The noise limits included in these conditions have been superseded by EPL 20797 Condition L3.

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70	NOISE LEVELS -Sound pressure levels (measured as an LA10 15 minute) generated by activities on the premises shall not exceed the following levels when measured at the nearest boundary of the receptor: Residential Properties F1 43dB(A) L10 between the hours of 7am-10pm F2 38dB(A)L10 between the hours of 10pm-7am Industrial Properties F3 65dB(A)L10 between the hours of 7am-10pm F4 60dB(A)L10 between the hours of 10pm-7am F1-F4 Sound Pressure Level		
71	TRADE WASTE - A copy of the Trade Waste Certificate issued by Sydney Water shall be submitted to Council	Not verified	BRS advised that the Sydney Water Trade Waste Agreement had been provided to Council. Copies of the agreement are also available on BRS's website.

Appendix B – Photo Log

Photo Log



Photo 1: Site entrance, 16 Kerr Road Ingleburn.



Photo 2: View northeast along access road with weighbridge on the left hand side. Note sign attached to building showing approved hours of operation.



Photo 3: View from site back out to Kerr Road showing weighbridge on the right hand side and traffic control hut at front gate.



Photo 4: Stocked spill kit adjacent to site access road.



Photo 5: Landscaping and fencing along the north-eastern boundary of site.



Photo 6: Waste segregation bins.



Photo 7: Bunded stormwater pit located within the operational area of the site.



Photo 8: Protected stormwater pit located down gradient of the operational area of the site, on the south-western boundary.



Photo 9: A liquid waste collection sump. This sump receives surface water run-off from site and is serviced by an automatic pump which pumps contents to the front end of the treatment process when sump reaches near-capacity.



Photo 10: Unloading of liquid waste at the front-end of the treatment process.



Photo 11: Liquid waste collection point showing rumble grid to remove any large debris / material



Photo 12: In-line Sydney Water testing point which is accessed as required by Sydney Water to test compliance with Trade Waste Discharge Permit requirements.



Photo 13: Traffic control / management signs on site.



Photo 14: Concrete truck washout waste tank.



Photo 15: Heavy vehicle proceeding through the vehicle wheel wash prior to site departure.



Photo 16: Road conditions on Kerr Road immediately adjacent to site entry / exit point. Note that the site sweeper had recently been through this area. Site exit point noted to be clean and free of sediments etc.



Photo 17: The rear side (eastern side) of the noise wall located on the south-eastern boundary of the site showing previous efforts to remove graffiti as required by condition 12 of DA 948/2015/DA-I/B.



Photo 18: Water storage tanks at back-end of treatment process. Water is reused on site for dust suppression and for treatment during crushing etc.



Photo 19: Water storage tanks at back-end of treatment process. Water is reused on site for dust suppression and for treatment during crushing etc.

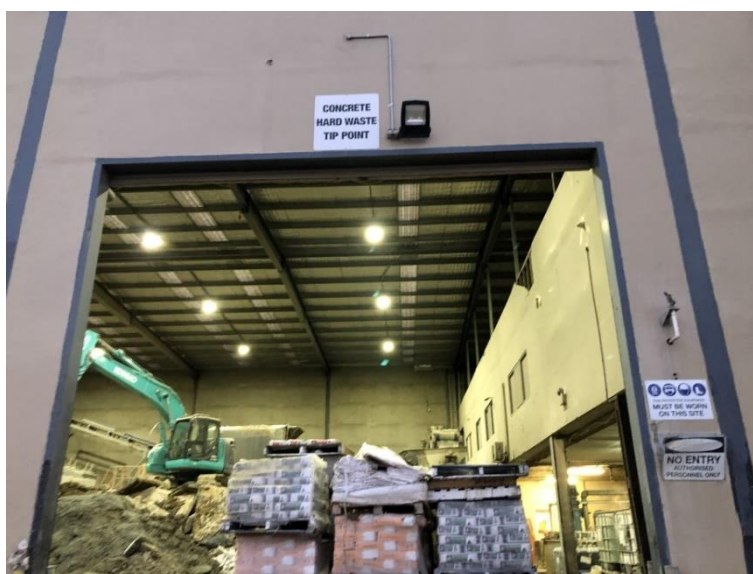


Photo 20: Enclosed crushing facility.

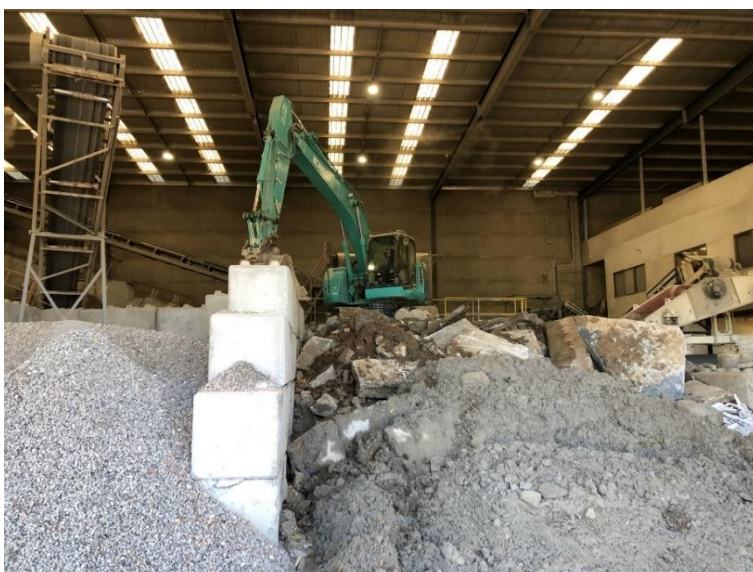


Photo 21: Enclosed crushing facility including misting sprays for dust suppression.



Photo 22: Inadequate liquid waste storage containment. Drums not stored on available bunding. No placarding provided.



Photo 23: Photo provided of flammable goods contents. No placarding or bunding evident.



Photo 24: Waste logging and sampling point to be undertaken by the driver of the delivery vehicle. The machine logs the sample with the respective provider, including company ID, driver ID, vehicle registration and waste description.

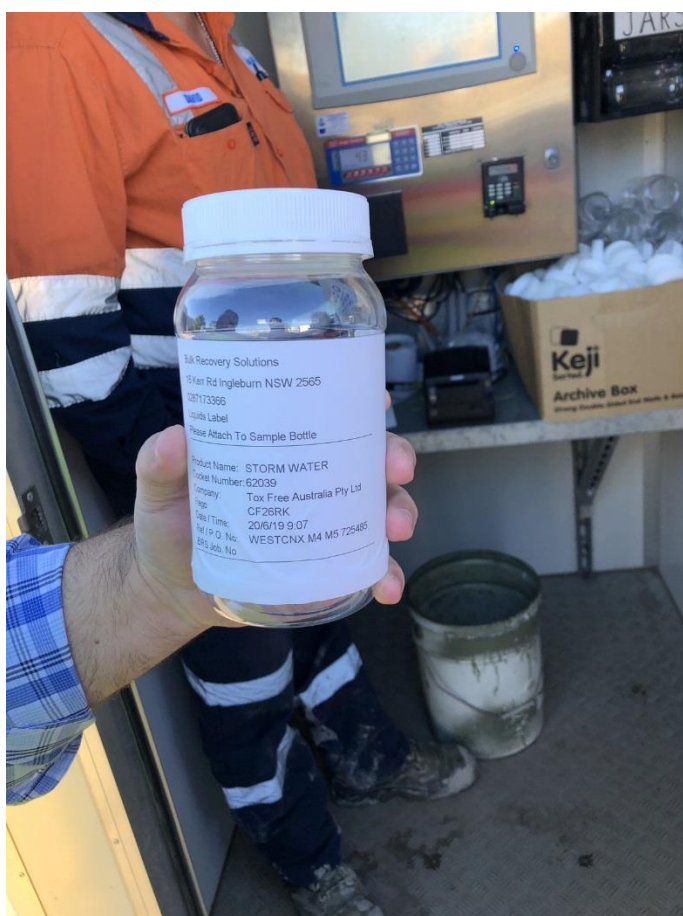


Photo 25: Sample jar with printed label (generated from log-in point) which is to be filled with representative sample for incoming liquid waste loads.



Photo 26: BRS laboratory.



Photo 27: Double skinned / bunded diesel fuel tank.

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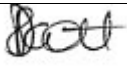
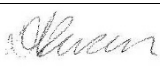
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Document Status

Revision	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
A	D Scott B Bracken	D Kovacs	<i>D Kovacs</i>	K Rosen	<i>K Rosen</i>	10/07/2019
0	B Bracken	D Scott		D Kovacs		16/08/2019

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