

Date 24/05/2021
To Brad Searle
From Heather Tilley
Copy to Katie McCallum, Ros Dent
Subject Eastern Creek Management Plan Updates.

The consolidated Project Approval (06_0139) as modified (MOD1 to MOD6, and MOD8) for the Eastern Creek Ecology Park (& Landfill) Facility, requires the preparation of a series of management plans, which require approval from the Department of Planning, Infrastructure and Environment (DPIE).

At the time that Bingo purchased Dial and Dump Industries (DADI), the Environmental Management Strategy (EMS) comprised the main EMS document and 13 separate management plans or monitoring plans as appendices. The final report (Barnett & May, 20 May 2020) for the Independent Audit undertaken in November 2019 identified a number of non-compliances against the Project Approval, many of which related to the existing management plans available at the time of the audit.

With the findings of the independent Audit and the approval of MOD6 on 29 April 2020 and MOD 8 on 3 March 2021 (post IEA audit), Bingo took the opportunity to review and update the management plans for the Facility, to rebrand the documents to Bingo, but also bring them in line with the current DPIE guidelines for preparation of the environmental management plans (DPIE, 2020). This has resulted in a complete redrafting of the management plans.

Arcadis undertook a review of the Project Approval and determined that the following plans were required.

Table 1: Required management plans (06_0139, as modified)

CoC	Management Plan
Sch3 C8	Landfill Plan (LEMP)
Sch3 C16	Emergency and Fire Response Plan (E&FRP)
Sch3 C16a	Conveyor and Chute System Maintenance and Management Plan (CCSMMP)
Sch3 C21	Soil Water and Leachate Management Plan (SWLMP)
Sch3 C25a	Interim Stormwater management Plan (ISWMP)
Sch3 C37	Air Quality Odour and Greenhouse Gas Management Plan (AQMP)
Sch3 C59	Landscaping and Vegetation Management Plan (LVMP)
Sch3 C61	Aboriginal Heritage Management Plan (AHMP)
Sch4 C2	Rehabilitation and Closure Plan (RCP)
Sch5 C1	Environmental Management Strategy (OEMP)

Where possible, the existing 13 management plans were consolidated into the above management plans, or converted into Bingo procedures.

Table 2 below provides a summary of the gaps identified in the existing DADI management plans in place at the time of the IEA audit and what updates were undertaken to bring the plans into line with the Project Approval and the DPIE Guidelines.

General comments applicable to all management plans

- All of the plans have now been prepared to be in line with the DPIE guideline and the requirements of Schedule 5 Condition 2 (Management Plan Requirements), where appropriate.
- All plans have been updated to reflect current works being undertaken.
- Construction information (where applicable) has been removed to enable plans to focus on operations only.

- All requirements of the approved MOD5, MOD6 and MOD8, and recent changes to regulatory requirements have been incorporated.
- A legislation register with details has been provided in the OEMP, and each plan has been updated to reference the specific legislation applicable to that aspect.
- Where required the Statement of commitments (as per the EIS) have not been included in the plans.
- All plans have made use of the correct language, ie “should”, “would” and “recommend” have been replaced with “will”.
- Corrective action and what those corrective actions will have been included where appropriate
- Adequate tracking and evidence of consultation where this has occurred.
- Responsibilities and time frames have been assigned to measures, contingencies, monitoring and reporting.

Table 2: Updates to existing management plans

CoC	Existing EC Plans	06_0139 Requirements	Consul-tation	Secretary Approval	Major Gaps	Updates Made
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS						
5	<p>Waste Monitoring Program</p> <ul style="list-style-type: none"> A draft of the WMP (June 2017) includes references to Landfill Plan (LP) and Environmental Waste Management Plan (EWMP). The LP and EWMP were prepared by Douglas Partners and have not been provided. 	<u>Waste Monitoring Program</u>	EPA	Yes	<p>Considered to be a procedure / program rather than a plan</p> <p>IEA Recommendations:</p> <ul style="list-style-type: none"> EMS to reference all relevant procedures , including asbestos management procedures Document the existing waste handling and monitoring procedures in a Waste Monitoring Program that meets the requirement of the Approval. Revise the Waste Management Plan to include details of the incoming waste monitoring requirements, and record keeping related to waste processing and disposal. 	<ul style="list-style-type: none"> Bingo converted the plan to a procedure. The fully redrafted Landfill Plan (LP) (CoC8) has referenced the relevant procedure / programs. The IEA recommendations have been addressed. This has been submitted to DPIE on 24 May 2021.
8	Landfill Management Plan	<p><u>Landfill Plan</u></p> <p>Must be submitted every 3 years during the life of the operation (coinciding with the independent environmental audit required at Schedule 4, condition 4)</p>	No	Yes	<p>IEA Recommendations:</p> <ul style="list-style-type: none"> Update the Landfill Plan to include all of the requirements of Schedule 2, Condition 8 of the Planning Approval. <p>Other gaps</p> <ul style="list-style-type: none"> Not in Bingo format, structure of the plan and out of date figures Statutory requirements and statement of commitments Existing environment and operational impacts Leachate barrier leachate collection system, leachate treatment system Landfill gas extraction system Site plan and equipment Covering of waste (daily and interim cover) 	<p>The plan has been <u>fully redrafted</u> to Bingo format/branding and to address C8 and C9 of the project approval 06_0239</p> <p>It also has been updated to address the requirements of the DPIE EMPs guideline (where relevant) and the Solid waste guidelines. (as per IEA recommendation).</p> <ul style="list-style-type: none"> The author of the LP was approved on 25/01/2021 by the DPIE as the independent expert (included in Appendix A of the plan) Updated to be consistent with Schedule 5, Condition 2 of the project approval 06_0239. Leachate management has been addressed in S4.2.3 of the LP and also within the Soil, Water and Leachate Management Plan (SWLMP) (C21). The LP references the SWLMP where applicable. Plan has been submitted to DPIE on 24 May 2021.

CoC	Existing EC Plans	06_0139 Requirements	Consul-tation	Secretary Approval	Major Gaps	Updates Made
10, 11, 21, 27, 28	A Leachate Collection Conveyance and Management Plan	A report was required to be submitted to DPIE providing details of the proposed leachate collection, conveyance, extraction, storage, treatment and disposal systems	No	No	No separate plan is required	<ul style="list-style-type: none"> Applicable sections of the DADI plan have been included in the updated SWLMP.
14 & 59d)	Pests, Vermin Feral Animals and Weed Management Plan (PVFAWMP)	A separate plan is not required	No	No	<p>IEA Recommendations:</p> <p><i>Review the Pests, Vermin Feral Animals and Declared Noxious Weeds Management Plan to provide a framework to assist site personnel to:</i></p> <ul style="list-style-type: none"> identify weed and pest infestations, define weed and pest inspections activities, define weed and pest management actions, and define weed and pest reporting procedures, including where required reporting of noxious weed infestations as required under NSW Weed Legislation. <p>Provide training to relevant staff in the implementation of the revised Plan.</p> <p>Not applicable. A separate plan is not required</p>	The Landscape and Vegetation Management Plan (LVMP) (CoC 59) has <u>been fully redrafted</u> into Bingo format/branding and has been updated to include this recommendation. The Plan has been submitted to DPIE.

CoC	Existing EC Plans	06_0139 Requirements	Consul-tation	Secretary Approval	Major Gaps	Updates Made
16	Emergency Management Plan (EMP)	<u>Emergency & Fire Response Plan (E&FRP)</u>	NSW Fire Brigade	No	<p>IEA Recommendations:</p> <ul style="list-style-type: none"> Prepare a consolidated site-specific E&FRP During preparation of the site-specific E&FRP consult with the NSW Fire Service or appropriate expert in relation to the provision of adequate firefighting equipment. <p>Other gaps</p> <ul style="list-style-type: none"> not in Bingo format, statutory requirements emergency control organisation (Roles and responsibilities), emergency and pollution response procedure, emergency training/drills emergency contacts emergency site plans (fire extinguisher, first aid station) emergency response flowcharts 	<p>The Emergency & Fire Response Plan (E&FRP) has been prepared by Progressive Risk Management.</p> <p>It has been updated to be consistent with project approval 06_0239</p> <p>The Plan has been submitted to DPIE.</p>
16b	Conveyor and Chute Waste Handling Procedure	<p><u>Conveyor and Chute System Maintenance and Management Plan (CCSMMP)</u></p> <p>Required prior to operation to the satisfaction of the Secretary</p>		Yes	<p>EA Recommendations:</p> <p>Revise the CCSMMP to ensure that it describes the maintenance and management of the system</p> <p>Not applicable – considered to be a procedure rather than a plan</p>	<p>Bingo has converted the plan to a procedure.</p> <p>Note the Conveyor and Chute System has been operational since landfilling commenced</p>
21	Soil Water and Leachate Management Plan (SWLMP)	<p><u>Soil, Water and Leachate Management Plan (SWLMP)</u></p> <p>Relevant revision of the <i>Environmental Guidelines for Solid Waste Landfills (2nd edition, 2016)</i> to be</p>	EPA	Yes	<p>IEA Recommendations:</p> <p>Review and update the SWLMP to address the following:</p> <ul style="list-style-type: none"> Include a Sediment and Erosion Control Plan that is consistent with the latest version of "Managing Urban Stormwater: Soils and Construction (Landcom). Include practical measures to be implemented to minimise water use on the site. 	<p>The SWLMP has been <u>fully redrafted</u> into Bingo format/branding and also to be consistent with Schedule 5, Condition 2 of the project approval 06_0239 (as modified in Mod4 and Mod5) and the DPIE Guidelines where appropriate.</p> <p>The plan has also been rewritten to address the IEA recommendations. The Plan has been submitted to DPIE.</p>

CoC	Existing EC Plans	06_0139 Requirements	Consul-tation	Secretary Approval	Major Gaps	Updates Made
		referenced in the SWLMP. Suitably qualified and experience experts			<ul style="list-style-type: none"> Include all relevant details of activities, events or circumstances that may result in soil erosion. Include detailed plans of the existing site stormwater management system. Ensure that the plan addresses the requirements of the <i>Solid Waste Landfills guidelines</i>. Ensure that the plan provides at least a summary of the baseline data and full details of the existing groundwater network. Ensure that the response plan defines trigger values and provides a protocol for investigation, notification, and mitigation of any exceedances of the respective trigger levels. Include measures that could be implemented to respond to any surface or groundwater contamination. <p>Other Gaps</p> <ul style="list-style-type: none"> Not in Bingo format, structure of the plan and out of date monitoring program statutory requirements and statement of commitments summary of consultation existing environment and operational impacts/risks Monitoring parameters, frequency and limits 	<p>The plan has been updated:</p> <ul style="list-style-type: none"> With the most recent water balance, which was specifically prepared for the SWLMP and other surface water operations. A summary of surface water, groundwater and leachate monitoring programs has been included To include the most recent legislation With more up to date figures To address the solid waste guidelines To include contingency measures
21(d)	Groundwater Monitoring Program (GWMP)	A separate plan is not required			Not applicable – considered to be a procedure / program rather than a plan	The GWMP is included the included in the SWLMP (CoC 21)
25a		<u>Interim Stormwater management Plan</u> MOD 5 September 2015	Council	Yes	<p>Not applicable – the plan is required to comply with MOD5 and MOD8</p> <p>IEA Recommendations:</p> <p>Provide evidence of consultation</p>	The Interim management plan was prepared by to be consistent with Schedule 5, Condition 2 of the project approval 06_0239. The Plan has been submitted to DPIE and subsequently referred to EPA and Blacktown City Council for consultation.

CoC	Existing EC Plans	06_0139 Requirements	Consul-tation	Secretary Approval	Major Gaps	Updates Made
28a	Spoil Management Plan (SMP, dated September 2015 and prepared by Genesis Zero Waste)	<u>Spoil Management Plan</u> MOD 5 September 2015			<p>September 2015 version to be reviewed and updated for bulk earthworks if required</p> <p>The CoC states that the Proponent shall carry out bulk earthworks approved by Modification Application MP 06 0139 Mod 5 in accordance with the Spoil Management Plan prepared by Genesis Xero Waste (subject to any revisions to the Spoil Management Plan that may be approved by the Secretary from time to time).</p> <p>IEA Recommendations:</p> <p>The IEA report states the “Civil works had commenced for the pre-sort enclosure. The works are being undertaken in general accordance with the Spoil Management Plan”. The Auditor considered the EC facility to be compliant with this CoC.</p>	No further updates to the Spoil Management Plan are required as per the IEA recommendation.
31	Green Waste Management Plan	A separate plan is not required			Not applicable – considered to be a procedure / program rather than a plan	Is part of the waste monitoring programme but is also addressed in the Section 2.6.1 of the updated EMS
36, 37	Landfill Gas Monitoring Program (LGMP)	A separate plan is not required			Not applicable – considered to be a procedure / program rather than a plan	The LP has been updated to reference the Landfill Gas Monitoring Program (LGMP) – A separate monitoring program has been prepared and is referenced in the Landfill Plan
37	Air Quality Odour and Greenhouse Gas Management Plan (AQMP)	<u>Air Quality Odour and Greenhouse Gas Management Plan (AQMP)</u> Requirements updated in MOD6 April 2020	EPA	Yes	<p>IEA Recommendations:</p> <p>Review the AQMP to:</p> <ul style="list-style-type: none"> ensure that all commitments made in the plan are implemented or the plan revised to reflect current site practices include the location of all monitoring points <p>Other Gaps</p> <ul style="list-style-type: none"> To be consistent with Schedule 5, Condition 2 of the project approval 06_0239 and DPIE Guidelines Include CoC 37a (MOD6) as an audit requirement 	<p>The AQMP has been <u>completely redrafted</u> into Bingo format/branding to address MOD6 and to be consistent with Schedule 5, Condition 2 of the project approval 06_0239 and DPIE Guidelines</p> <p>The AQMP has been prepared by an air quality expert (endorsed by the DPIE on 15/07/2020).</p> <p>The AQMP has also been updated to include the findings of the Air Quality audit undertaken in July 2020 in accordance with the Project Approval. The Audit report is included in Appendix C. The AQMP has been submitted to DPIE.</p>

CoC	Existing EC Plans	06_0139 Requirements	Consul-tation	Secretary Approval	Major Gaps	Updates Made
40	Noise Monitoring Program	A separate plan is not required	EPA	Yes	Not applicable – considered to be a procedure / program rather than a plan The OEMP should include a section on noise and will detail new MOD6 CoC 38, 38a, 38b, 38c and 39	The updated EMS includes a new section (S5.5) which addresses noise and the noise monitoring programme.
51	Traffic and Transport Code of Conduct Management Plan (TTCCMP)	A separate plan is not required	RTA Blacktown Council	Yes	Not applicable – considered to be a procedure / program rather than a plan	The updated EMS includes a S5.6 which addresses traffic, access and parking. Traffic Code of Conduct is included in Appendix J of the updated EMS.
53, 54	Amenity Berms Management Plan	Not required			IEA Recommendations: <ul style="list-style-type: none"> As part of the vegetation planting on the amenity berms include the planting of trees in accordance with the objectives of the EIA. Update the Appendix H of the EMS with an up-to-date plan showing the location of the amenity berms and other relevant visual screens. Obtain a copy of DPE's approval of the Visual Screening design / plan and retain for future audits. <p>Not applicable – considered to be a management measures and were required to be design and constructed prior to operations commencing</p>	Maintenance of the amenity berms is included in S2.6 of the fully redrafted Bingo formatted LVMP (CoC 59) and throughout the fully redrafted EMS.
56, 15	Fencing and Security Plan	Not required			Not applicable – considered to be a management measures and were required to be design and constructed prior to operations commencing A	Addressed in S2.12 of the fully redrafted EMS
59	Landscape and Vegetation Management Plan (LVMP)	Landscape and Vegetation Management Plan	NOW Council	Yes	IEA Recommendations: Commission a qualified and experienced ecologist to inspect the rehabilitation works annually to assess the performance of the rehabilitation works and make recommendations for remedial works as required. Other Gaps <ul style="list-style-type: none"> not in Bingo format and not well structured 	The LVMP has <u>been fully redrafted</u> in Bingo format/branding and to be consistent with Schedule 5, Condition 2 of the project approval 06_0239. Table 5-1 Monitoring requirements of the updated LVMP has been updated to include the IEA recommendation The IEA recommendations have been addressed. The LVMP has been submitted to the DPIE.

CoC	Existing EC Plans	06_0139 Requirements	Consultation	Secretary Approval	Major Gaps	Updates Made
					<ul style="list-style-type: none"> statement of commitment and summary of consultation existing environment, operational impacts/risks review of the plan 	
61	Aboriginal Heritage Management Plan (AHMP)	Aboriginal Heritage Management Plan	OEH	Yes	<ul style="list-style-type: none"> not in Bingo format and not well structured statutory requirements and statement of commitment summary of consultation existing environment, and operational impacts/risks 	<p>The AHMP has been fully redrafted in Bingo format and to address Schedule 3 Conditions 60 and 61 and is now consistent with Schedule 5, Condition 2 of the project approval 06_0239.</p> <p>The AHMP has been peer reviewed by a Heritage Consultant and submitted to DPIE.</p>
	Road Monitoring Program				N/A	<ul style="list-style-type: none"> BINGO convert to a procedure/program
SCHEDULE 4 – REHABILITATION AND CLOSURE						
2	Rehabilitation and Closure Plan	Genesis IEA Master table includes references to the Landfill Rehabilitation and Closure Plan (LRCMP), prepared by Earth Scientists (23.02.2017). The LRCMP has not been provided for review.	EPA Council		IEA Recommendations: Review and revise the Landfill Rehabilitation and Closure Plan to include all of the information required by Schedule 4 Clause 2 of the Project Approval.	<p>The Landfill Plan has been fully redrafted, is now in Bingo format and includes a section (S4.3.4) within the plan that references the Landfill Rehabilitation and Closure Plan.</p> <p>It is noted that this plan is required 12 months before closure of the landfill. This is also included as an objective in Table 1.1 of the landfill plan.</p>
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING & AUDITING						
1	Environmental Management Strategy (EMS)	<u>Environmental Management Strategy</u>		Yes	IEA Recommendations: <ul style="list-style-type: none"> The EMS was prepared in 2011 and needs to be reviewed and revised to reflect the current Statutory Approvals framework and should include description of all licences and approvals 	<p>The EMS has been fully redrafted, and is now in Bingo format, and has been prepared as the OEMP. It is now consistent with Schedule 5, Condition 2 of the project approval 06_0239 and DPIE guidelines.</p> <p>The EMS also addresses the recommendations of the IEA</p>

CoC	Existing EC Plans	06_0139 Requirements	Consul- tation	Secretary Approval	Major Gaps	Updates Made
					<p>held under NSW legislation. This will be addressed in the updated EMS</p> <p>Review the EMS and update:</p> <ul style="list-style-type: none"> Section 9 (Site Management), Section 10 (Roles and Responsibilities) and all other references to roles and responsibilities throughout the document. Note that the EMS should include references to the roles and responsibilities of, where relevant Bingo Industries personnel, in particular the Bingo Industries Environment Manager who has a significant oversight role in relation to environmental management at this facility. Sections 17, 18, 19 and 20 to reflect current best practice. Ensure that copies of all plans, programs and strategies are attached to the EMS. <p>All other plans:</p> <ul style="list-style-type: none"> Undertake a detailed review and update of all plans and programs required under the Project Approval. Required to address Schedule 5 Condition 2. <ul style="list-style-type: none"> Not in Bingo format and poor structure statement of commitment out of date figures summary of consultation (waste, noise monitoring programs) existing environment and operational impacts/risks contingency 	<p>Roles and responsibilities have been updated to reflect Bingo staff / roles</p> <p>A summary of all inspections, reporting and monitoring requirements is included and addresses best practice.</p> <p>Links to other Management plans has been included (S1.3)</p> <p>The OEMP includes a summary of the most relevant requirements in a simple and consolidated format in an Appendix to the OEMP so that these can be easily extracted and used by site personnel.</p> <p>The following consolidated information is included:</p> <ul style="list-style-type: none"> Legislation register. Mitigations measures for all aspects of the site, colour coded for each aspect to make it easy to identify what is required. A consolidated list of monitoring, reporting and inspection requirements, also colour coded to link back to the mitigation measures. Bingo HSE Management system and processes Bingo Environmental Policy Roles and responsibilities for the site as a whole. Specific roles for specialist areas will be highlighted in the individual plans as required Training Complaints management Incident management and reporting Emergency contacts Risk register for the site (as per the EIS) Details of audits.