

# Boral Widemere Recycling Facility Independent Environmental Audit Report

January 2024



Prepared By:  
*International Environmental Consultants Pty Limited*  
"Longmead"  
700 Wombeyan Caves Road  
High Range NSW 2575

---

---

# Table of Contents

---

<b>1. Introduction</b>	<b>1</b>
1.1 Background	1
1.2 Audit Objectives	2
1.3 Audit Scope	3
1.4 Audit Criteria	3
1.5 Correspondence with Agencies	4
1.5.1 NSW Department of Planning and Environment	4
1.5.2 NSW Environment Protection Authority	4
1.5.3 Transport for NSW	5
1.6 Audit Period	5
<b>2. Audit Methodology</b>	<b>6</b>
2.1 Audit Plan	6
2.2 Review of Environmental Documentation	6
2.3 Environmental Monitoring Data	6
2.4 Site Interviews and Inspections	7
2.5 Compliance Status Description	8
<b>3. Audit Findings</b>	<b>9</b>
3.1 Site Inspection	9
3.1.1 Areas Noted for Improvements	10
3.1.2 Aspects Required to Meet Industry Best Practice	11
3.2 Management Plans	12
3.2.1 Operational Environmental Management Plan	13
3.2.2 Surface Water Monitoring and Mitigation Plan	14
3.2.3 Dust Management Plan	15
3.2.4 Groundwater Management Plan	16
3.2.5 Noise Management Plan	17
3.2.6 Waste Monitoring Plan	17
3.3 Quality Control Procedures and Tracking	18
3.4 Monitoring Data Review	18
3.5 Operational Performance	19
3.6 Notices, Penalties and Prosecutions	19
3.6.1 Discharge Events	19
3.6.2 Recovered Aggregate Order Audit July 2021	20
3.6.3 EPA Inspection 17 February 2021	20
3.6.4 Pollution Reduction Programs	20
3.7 Compliance Status	21
<b>4. Conclusions and Recommendations</b>	<b>23</b>
4.1 Audit Conclusions	23
4.2 Audit Recommendations	23

---

---

## **Appendices**

**Appendix A** – Audit Compliance Tables

**Appendix B** – Documents Sighted and Reviewed

**Appendix C** – Site Photographs

**Appendix D** – Authority Consultation

**Appendix E** - Audit Certification

# Document Control

1	Name:	Independent Audit Widemere Recycling Facility
	Author:	Robert Byrnes
	Development Consent:	SSD 6525
	Environment Protection Licence	11815
	Revision No.:	3
	Document Status	Final

REVISION DETAILS	Revision No.	Date	Details of Revision	Reviewed By	Approved By
	1	20/12/23	Draft for internal IEC review	KL	RB
	2	8/1/23	Client Discussions	RB	RB
	3	22/10/23	Final	RB	RB

CIRCULATION DETAILS	Name	Department/Organisation
	KL	Keira Leahy - IEC
	RB	Robert Byrnes - IEC
	LS	Lauren Sibigroth – Boral
	Final for Distribution	Boral – Widemere
		Department of Planning and Environment
		NSW Environment Protection Authority
		Transport for NSW

# 1. Introduction

---

Boral Recycling Pty Ltd own and operate the Widemere Waste Recycling Facility at Wetherill Park. The facility holds Development Consent SSD 6525 granted on 25<sup>th</sup> November 2016 and modified on 10<sup>th</sup> October 2016 to include an additional property description. Condition D7 requires the facility to commission an Independent Environmental Audit within the first year of the consent and every three years thereafter. This report represents the third Independent Environmental Audit of the facility since the grant of the consent.

## 1.1 Background

Boral Recycling Pty Ltd (Boral) own and operate the Widemere Waste Recycling Facility at Wetherill Park which produces a range of building and construction products by separating, crushing and blending recovered construction and demolition (C&D) wastes with quarry products. These products are then on sold to the local construction market.

The original approval for the site (DA 21-1-2002-i) was granted under the NSW Environmental Planning and Assessment Act 1979 (EP&A Act) by the Minister for Planning and was subsequently modified in 2005 allowing a production increase and change to hours of operation. A new approval (SSD 6525) for the expanded operations of the Widemere facility was granted in 2016 by delegate to the Minister for Planning and is the subject of this Independent Environmental Audit. As defined by the definitions within the consent, the expanded operation is triggered when throughput exceeds 750,000 tpa and receipt of additional waste streams occurs on site. The proponent has determined this to have occurred in November 2021. The approval history of the site is summarised in the table below.

Date	Approval	Particulars
November 2002	21-1-2002-i SSD	Approval granted for the construction and operations of a materials recycling facility with a processing capacity of 600,000 tonnes per annum of non-putrescible construction and demolition waste.
November 2005	126-8-2005-i Modification 1	A modification of original consent (DA 21-1-2002-i) to increase the hours of operation and the addition of a blending plant.
November 2016	SSD 6525	SSD Approval granted to increase the processing capacity to 1,000,000 tonnes per annum.
October 2017	SSD 6525 Modification 1	incorporate Lot 4000 DP 1173524 into the approved site boundary. This proposed modification was in response

		to a condition of consent imposed under SSD 6525 which requires the positioning of a meteorological station to service the facility.
November 2021	Trigger for SSD 6525	The commencement of the expanded operations is specified in the consent definitions as when annual throughput exceeds 750,000 tpa

The facility is on a site that was formerly used for quarrying and associated activities from 1924 through to approximately 2002. From 1975 to around 1997, an asphalt plant and stockpiles operated on the site. From 1997 until 2002, the site was used for stockpiling gravel and other construction materials.

The facility is located within a predominantly industrial area. The site lies in between two industrial precinct areas being the Wetherill Park industrial precinct and Greystanes Estate Southern Employment Lands. The closest residential areas are approximately 1km to the east in Greystanes, and 1.5km north east of the facility in Pemulwuy.

## 1.2 Audit Objectives

The objectives of this audit are specified by Condition D7 which states the audit should:

- Assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under these approvals);
- Review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and
- Recommend measures or actions to improve the environmental performance of the Development and/or any strategy, plan or program required under these consents.

The consent also requires that the audit include the results of consultation with relevant agencies within the scope of the audit. The results of the consultation work are provided in Section 1.5.

An overall objective of this audit is to establish a structured framework to ensure ongoing compliance with the development consent. As this is the third audit of the development it has relied on earlier audits to establish compliance with pre-commencement conditions and historic information on the original development project on site. This audit focuses on environmental performance and how the development is managed to ensure ongoing compliance with the development consent, Environment Protection Licence and established performance criteria.

---

### 1.3 Audit Scope

This audit has centred on the operation of the facility located at Widemere Road Wetherill Park. Sources of materials being delivered to the facility and destinations for finished products are outside the scope of this audit. This audit is required to:

- Be prepared in accordance with the Post Approval Requirements - Independent Audit guidelines published by the Department of Planning and Environment.
- Include all on site operations and activities.
- Include all post approval environmental management plans and procedures identified in SSD 6525.
- Determine the compliance status of the operation with all conditions of consent applicable to the phase of the development that is being audited.
- Assess compliance with all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans.
- A review of the environmental performance of the operation including an assessment of actual impacts compared to predicted impacts documented in the environmental impact assessment.
- Confirm the physical extent of the development in comparison with the approved boundary.
- Report on incidents, non-compliances and complaints that occurred or were made during the audit period.
- Determine the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit.
- Document feedback received from the Department, and other agencies and stakeholders, on the environmental performance of the project during the audit period.
- Document the status of implementation of previous Independent Audit findings, recommendations and actions (if any).
- Provide a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- Provide information on any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

The scope of work for this audit also include methods and procedures outlined in the Independent Audit Post Approval Requirements 2020 published by the Department.

### 1.4 Audit Criteria

The compliance descriptors described in Section 2.4, are based on the Independent Audit Post Approval Requirements 2020 guidelines. These specify that each condition of consent be assessed as being either in compliance or not in compliance. A not triggered category can be listed if the condition has yet to be triggered by the development.

---

---

In order to determine compliance, physical evidence must be sighted by the auditor. This can be in hard copy or digital format or visually on site during the inspection. The assessment in these circumstances is usually a yes or no criteria, that is, has a particular circumstance or item been done or achieved.

Where conditions relate to environmental performance, requirements to meet best management practice or specific improvements, the evidence will be in the form of reviewing monitoring data and results and to compare these with established criteria. The criteria used to assess compliance in these circumstances have included:

- Performance measures documented in Schedule C of SSD 6525.
- Performance criteria specified in Environment Protection Licence (EPL) 11815.
- Modelled or assessed performance outcomes predicted in the 2015 EIS.
- Listed provisions of the document "Guide to Better Practice and Resource Recovery Centres 2019 EPA Victoria
- Construction and Demolition Waste Management Guideline UNSW 2021.
- NSW Waste Avoidance and Resource Recovery Strategy 2014-2021 NSW EPA (as updated).
- Resource Recovery Order for the supply of recovered aggregate waste 2014.

## **1.5 Correspondence with Agencies**

The following agencies were contacted for their input and advice prior to the commencement of this audit:

- NSW Department of Planning and Environment – Planning and Assessment
- NSW Environment Protection Authority
- Transport for NSW

A summary of the responses is provided in the below while full details are provided in Appendix D.

### **1.5.1 NSW Department of Planning and Environment**

The DPE requested that the audit provides an assessment of the environmental performance of the project, with a focus on Surface Water Management. Please review the requirements of the consent, Environmental Management Plans and EPL, and assess the project's performance in this area. This detail is to be provided in addition to the IEA requirements outlined in the Conditions of Consent and Independent Audit Post Approval Requirements 2020 available on the DPE website. Surface water management is discussed in Section 3.2.2.

### **1.5.2 NSW Environment Protection Authority**

The EPA made detailed comments, firstly setting out the licence limits and history including the previous Pollution Reduction Program and resulting Surface Water Management and Monitoring Plan requirement. The EPA is currently finalising a new PRP which will incorporate further monitoring based on the findings of the previous PRP.

On 17<sup>th</sup> February 2021, the EPA inspected the premises and observed a number of non-compliances with the Licence conditions and Australian Standards. The non-compliances related



---

to storage of dangerous goods and evidence of a spill, waste stockpile labelling, and appropriate delineation of tip and spread area from the storage/processing areas. The licensee has since rectified the non-compliances and an Advisory Letter was issued by EPA on 25 March 2021.

On 29<sup>th</sup> April 2021 the EPA carried out an unannounced audit inspection of the premises to assess compliance with the Resource Recovery Order for the supply of recovered aggregate waste 2014 to which the relevant Resource Recovery Exemption 2014 applies. The required actions to ensure compliance have been completed and a copy of the final audit report is available on the EPA's Public Register. The EPA advised that the following matters should be covered in the audit:

- Pollution monitoring data is required to be published on the licensee's website, in accordance with Section 66(6) of the Act. The EPA's Requirements for Publishing Pollution Monitoring Data sets out the written requirements that EPL holders should follow.
- All holders of EPL's are required to prepare a Pollution Incident Response Management Plan (PIRMP) in accordance with Section 153A of the Act. A copy is available on the licensee's website. To assist licensees with preparing a PIRMP, the EPA has developed a PIRMP Guideline, which provide details on the legislative requirements, and how to prepare, test and implement the plan.
- The licence requires the licensee to maintain a register of complaints it receives in relation to the premises. The licensee has not reported receiving any complaints since 2017.
- The licence requires the licensee or its employees to 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. The licensee has not reported any incidents since February 2022 (Extreme rainfall events lead to the discharge of retention basins).

The EPA also advised on the information that must be contained on the licensee's website including previous independent environmental audits, Annual Reviews, the latest Operational Environmental Management Plan and a complaints register.

### **1.5.3 Transport for NSW**

TfNSW specifically highlighted the assessment of Condition C53(a), no queues to extend onto the public road. Specifically, the conditions states that the Applicant shall ensure that the Development does not result in any vehicles parking or queuing on the public road network.

## **1.6 Audit Period**

This report represents the third Independent Environmental Audit of the facility since the grant of the consent and covers the period November 2020 to November 2023.

## 2. Audit Methodology

---

This audit has followed the methodology outlined in Independent Audit Post Approval Requirements 2020 published by the Department of Planning and Environment and also refers to the methodology contained in AS/NZS ISO 19011:2018 Guidelines for Auditing Management Systems. These documents provide for a systematic process of verification, firstly using documented evidence that is sighted by the auditor but in the absence of evidence, using a risk-based approach to determine the level of compliance.

### 2.1 Audit Plan

In accordance with section 6.3 of ISO 19011:2018, an Audit Plan was prepared for the Widemere audit. The plan included the formulation of the audit objectives and scope described in Chapter 1 as well as communication protocols with the auditee, details of information requirements, logistics, meetings and site interviews and detailed site inspection. This formed part of the overall audit methodology, which is described in more detail in the following sections.

A copy of the Audit Plan was provided to Boral on 13<sup>th</sup> November 2023 and approved by Boral on 14<sup>th</sup> November 2023.

### 2.2 Review of Environmental Documentation

Boral has produced a number of key documents covering the Widemere Recycling facility including:

- The planning consent and EPL documents.
- Environmental assessments supporting the original SSD application (2015 EIS) and the consent modification (2017 SEE) including specific studies on noise, dust and traffic.
- Widemere Recycling Operational Environmental Management Plan 2021.
- Component Environmental Management Plans covering waste monitoring, noise management, dust management, groundwater, surface water and incident management.
- Annual Reviews produced for the past three years covering the audit period.
- Boral's internal Environmental Management System.
- Historic documents in relation to construction activities.
- Production records.
- Previous audit documents.
- Various environmental training documents, registers and monitoring data.

The full list of documents reviewed as part of this audit is provided as Appendix B.

### 2.3 Environmental Monitoring Data

The Widemere facility collects the following environmental data:

- 
- 
- Incoming waste quality including asbestos detection sampling
  - Weather data from an on site weather station.
  - dust deposition data from two gravimetric monitoring sites.
  - Groundwater from a network of 4 monitoring wells.
  - Surface water during controlled discharge conditions.

Noise monitoring is generally undertaken on a yearly basis with the latest monitoring being completed in November 2023.

All monitoring data was made available as part of this audit. The data was received in digital form and all original laboratory results were made available. No additional monitoring was undertaken as part of the audit.

## **2.4 Site Interviews and Inspections**

The initial opening meeting was held on 27<sup>th</sup> November 2023. Present at the meeting was: Philip Paterson (Recycling Operations Manager), Brendan Whitmore (Site Manager) and Lauren Sibigroth (Environmental Business Partner NSW/ACT).

The opening meeting confirmed the Audit Plan which was prepared and sent to Boral on 13<sup>th</sup> November 2023 and approved by Boral on 14<sup>th</sup> November 2023. The Audit Plan covered the audit objectives, scope and criteria, confirmed the audit period, details of the proposed site inspection, specific matters to be addressed by site personnel during the interview process and required PPE.

The on site interviews were conducted with key Boral personnel involved in the opening meeting but also included discussions with weighbridge operator and load inspection personnel. These interviews covered specific items listed in the consent and EPL as well as general operation of the facility and environmental management practices.

An inspection of the premises occurred following the personnel interviews. The site inspection:

- Followed the path of materials from their initial receipt at the weighbridge inspection station through to finished products leaving the site via the wheel wash and weighbridge.
- Followed the flow of water from the highest part of the site through to the pollution control ponds at the lowest part of the site near the receiving waters of Prospect Creek.
- Included the receival and sorting area, stockpiling and processing.
- Included the cement batching plant and supporting infrastructure.
- Covered the entry and nearby roadways and intersections.

The results of the site inspection are provided in Section 3.1 while a photographic record is provided as Appendix C. At the completion of the site inspection, a closing meeting was also held. The closing meeting covered:

- ❑ Discussions on matters noted during the site inspection and the need for some follow-up information.
- ❑ Further discussions in relation to operating matters, particularly issues raised during the consultation process.
- ❑ Details of the program required to complete the audit.

Information provided and the outcome of the interviews and discussions have been used in the assessment of compliance.

## 2.5 Compliance Status Description

The attached Table 1 uses the descriptors outlined below. Although AS/NZS ISO 19011:2018 provides for grading of nonconformities to reflect the severity of environmental risk associated with the non-compliance, the Department guidelines specify that the audit should only determine a condition as being either compliant or non-compliant. A condition that has yet to be triggered can be noted as such, however terms such as partial compliance, administrative non-compliance or a grading of potential environmental harm is to be avoided.

The status descriptors are therefore limited to the following.

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Conditions that previous audits have noted as being non-compliant have largely been left as previously assessed unless subsequent rectification can be demonstrated to fully satisfy the condition. Where a previous audit has assessed a condition as being non-compliant because a specified action was not achieved within a specified timeframe, the compliance status will continue to be noted as non-compliant despite the required action being subsequently undertaken. However, where a previous non-compliance has been rectified so as the condition is now fully compliant, the compliance status will be updated as being fully compliant.

In addition to the above compliance descriptor, the audit has included observations and comments on the adequacy of environmental controls and procedures, including the efficacy of existing management and control procedures. As this is the third compliance audit, greater emphasis has been applied to the assessment of environmental performance which will establish a record of ongoing compliance with the consent conditions.

## 3. Audit Findings

---

The outcomes of the audit are discussed in the following sections. These include the site inspection, review of the monitoring program, management plans and controls. The audit results in relation to the conditions of the consent are provided in detail in Table A1 of Appendix A while compliance with the Environmental Protection Licence is provided in Table A2.

### 3.1 Site Inspection

A site inspection was conducted on 27<sup>th</sup> November 2023 and covered the entire site. A photographic record of the inspection can be found in Appendix C. The site inspection noted the following:

- All incoming loads are inspected at the weighbridge, gross vehicle mass is recorded along with supplier details, source, approval to proceed with docket or reasons for rejection. An inspection of the registered identified several loads which had previously been rejected and the reasons.
- Weighbridge on leaving the site registers the tare weight and allows for invoicing for materials delivered.
- All loads are spread out in the receival area for further inspection. The distance between new spread material and approved material is sufficient to avoid cross contamination.
- Dust in the delivery area is controlled by a water truck while sealed roads from the carpark and delivery area is regularly cleaned by a street sweeper truck.
- Permanent water sprays are provided along several stretches of sealed roads around the site. These are used for both dust suppression and increased evaporation of water contained in the pollution control ponds.
- The landscaping around the site is weed invested and needs some attention.
- All unsealed roadways are generally wet as a result of high usage of the water truck.
- The workshop area was neat and tidy with a well organised dry stores.
- All oil stores were bunded, usually with self bunding pallets or similar. The oil drums were also stored in a sealed shipping container.
- Water sprays were present on all visible conveyor discharge points. The material stockpiles were visibly damp and dust free.
- The external pollution control drain was intact and free of sediment build up.
- Some internal drains and pavements were damaged and should be repaired. These are noted in more detail later in this section.
- The two pollution control ponds were inspected. The HDPE liner showed no signs of wear or damage. The overflow between the ponds had a build up of sediment along the edge of the lining indicating that overflow had not occurred for some time.
- The discharge pipes from the southern pond showed evidence of previous discharge however the high water mark was light indicating that it has been an extended period since uncontrolled discharges had occurred.

- 
- 
- ❑ The site entrance and intersection showed no evidence of tracked dirt from the site. The street sweeper was in use at the time of the audit.
  - ❑ The carpark is generally well laid out and several spaces were vacant at the time of the audit.
  - ❑ Evidence of suitable employee training was available in the training room.
  - ❑ There were no queues of trucks either entering or leaving the site.

Following the site inspection, a tour was made of the surrounding area. The facility was not audible from nearby streets and there was no indication of dust leaving the site.

### 3.1.1 Areas Noted for Improvements

It was noted that an internal drain along the access road to the batch plant had collapsed. This is shown in the photo below.



**Plate 1 – Broken Drain on Access Road to Batch Plant**

Although the drain was broken, water flow simply flowed down the access road and into the main pollution control ponds. Concrete blocks are often used to define internal drainage lines, however they appear to become dislodged and create areas of water bypass as shown in the photo below.



**Plate 2 – Drain bypass due to misaligned concrete blocks**

---

---

Continual use of water on unsealed roads generates large quantities of mud which increases turbidity and sediment loading within the pollution control ponds. Consideration should be given to implementing a program of gradual sealing of the road surfaces.



**Plate 3 – Mud buildup on unsealed roads**

### **3.1.2 Aspects Required to Meet Industry Best Practice**

Table A3 of Appendix A details matters which are considered to constitute current industry best practice. These items were compiled from the documents listed in Section 1.4. Conditions C9(a), C16(b), C19(e), C46(e) refer to the need to meet industry best practice with respect to Noise Management, Dust Management and Surface Water Management respectively. These aspects are discussed below.

**Noise Management:** The site is ideally located from a noise management perspective being quite isolated from nearby residential receptors. The site uses low emitting smart alarms or “quacker” style reversing alarms on all mobile equipment. Evidence was provided that all mobile plant is regularly maintained in the onsite workshop which is itself located well within the facility. Speed controls are set for all roadways around the facility and there is bunding created at the sorting yard which shield mobile plant noise. Noise monitoring is undertaken annually using an external consultant. The November 2023 Annual Noise Monitoring found that noise emissions from the facility were inaudible at the nearest residential receptor at all assessment periods. This was also confirmed by this audit which found that the only audible noise immediately beyond the premises was traffic travelling along Widemere Road/Prospect Highway. Noise management at the Widemere facility is considered best industry practice.

**Dust Management:** The site incorporates a large range of dust mitigation measures. These include wheel generated dust from trucks entering and existing the facility, water sprays and a water cannon at the receival and sorting area, water sprays along the main roadways, water sprays at the primary crusher and conveyor tipoff point. The site was considered very wet during the inspection despite there being no rain in the preceding week. The high use of water for dust suppression is a function of the water management system which requires high water recycling to reduce the volume of water contained in the main pollution control ponds. However, this in turn has created a very dust free work environment. The data from the dust monitoring program has seen an improvement since the implementation of the recycled water system. The dust control system is considered above industry best practice.

---

---

**Surface Water Management:** There has been improvement in the water management system over the past 6 years. This has included the increase in dirty water storage volume, the lining of the ponds with HDPE liner, the installation of additional tank storage and the recycling program which provides a mechanism to preferentially reduce the volume of collected dirty water through evaporation. It was noted that water needs to pass through at least 3 storage ponds prior to final pond which is equipped with a high level discharge pipe. A triple pond containment system meets current industry best practice. The system is well maintained although repair work is necessary on some internal drains.

As discussed further in Section 3.2.2, the operation of the water recycling system allows for pollutants to concentrate in the final pollution control pond. There is the potential for poor water quality to be released from site in the absence of dilution effects caused by high rainfall. This situation could arise during a period of extended light rainfall which reduces the effectiveness of the evaporation through the dust suppression system. The operation originally proposed the installation of a water treatment plant to increase pH and reduce solids but determined that this was unnecessary due to effectiveness of the water recycling system.

Although the absence of a water treatment plant is not considered a matter of industry best practice, the identification of issues which could impact future environmental performance and continual improvement is considered part of the determination of industry best practice. The recommendation from this audit is that the site consider the reinstatement of the water treatment plant solely for the flocculation of solids and the lowering of pH.

### 3.2 Management Plans

The Widemere facility operates under a comprehensive Operational Environmental Management Plan (OEMP). This plan is required under Clause D2 of SSD 6525. The OEMP includes the following component management plans and programs:

- Waste Monitoring Program.
- Noise Management Plan.
- Dust Management Plan.
- Groundwater Monitoring Program.
- Surface Water Mitigation and Monitoring Plan.
- Pollution Incident Response Management Plan.

The site also operates under the standard Boral internal environmental management system (EMS). This consists of a single folder containing all relevant documents with additional resources available through the Boral intranet. The corporate EMS contains the following documents:

- Corporate Environmental Policy.
- Environmental Aspect and Impact Register
- Monitoring, record keeping and Measurement Plan
- Stakeholder Engagement Plan and Complaints Register
- Environmental Operating Procedures
- Environmental Checklist
- Emergency Response Plan
- Details of key environmental management plans.
- Environmental training requirements and records.



---

---

The above documents are kept in a single folder on site.

### 3.2.1 Operational Environmental Management Plan

The Operational Environmental Management Plan (OEMP) is an overarching document within which are a number of component environmental management plans. The first version was produced in June 2017 which covered the operation post approval of SSD 6525 but prior to the expanded development being triggered, that is, prior to waste volume being greater than 750,000 tpa. The current OEMP is Version 9, which was produced in March 2021 following the last Independent Environmental Audit. The current version was also prepared before the official commencement of the expanded development.

The OEMP consists of the following structure:

- ❑ Chapter 1 – Introduction: covering a description of the facility and its setting, operating hours and general administrative matters.
- ❑ Chapter 2 – Regulatory Requirements: this chapter identifies the OEMP requirements specified in SSD 6525 and where these are addressed in the OEMP document. The EPL and Resource Recovery Exemptions are also referenced.
- ❑ Chapter 3 – Strategic Framework for Environmental Management: this chapter primarily integrates the Boral Health and Safety, Environment and Quality Management System (HSEQ) with relevant matters pertaining to the Widemere facility and its component environmental management plans.
- ❑ Chapter 4 – Roles and Responsibilities: the roles and responsibilities described in this chapter were tested as part of this audit.
- ❑ Chapter 5 Environmental Performance: covers Noise, Air, Surface and Groundwater, Waste Management, and several other minor management issues.
- ❑ Chapter 6 Communication: covers internal and external stakeholder communications and reporting. Complaint receipt and dispute resolution issues are also documented. Notably, the OEMP documents that any incident that causes or threatens to cause material harm to the environment should be reported to the Secretary of the Department of Planning and Environment.
- ❑ Chapter 7 Incident and Non-conformance Response: includes both internal and external communications following incidents, corrective actions and roles and responsibilities.
- ❑ Chapter 8 Emergency Response: covers notifications, response actions and evacuation procedures.
- ❑ Chapter 9 Training and Review: covers competency and awareness training, performance and review procedures.

The initial 2018 version of the OEMP was approved by the DPE by letter on 28/05/2018 however the letter noted that the operations have not yet commenced. Some components of the OEMP, such as the Groundwater Management Plan required by Condition C38 are required to be completed within 6 months of commencing the expanded operations.

The current version of the OEMP was provided to the DPE on 17/07/2023 and as at the date of this audit, approval has not been obtained. It is open to interpretation whether or not the 2021

---

---

OEMP needs further approvals by the department, however in any event, the OEMP is already out of date and requires significant updating. Issues with the current OEMP are as follows:

- Boral has undergone a management restructure and the list of management titles, roles and responsibilities require updating.
- Updated noise monitoring and controls to reflect recent noise monitoring work.
- The groundwater monitoring program has been updated and which is not reflected in the OEMP.
- The surface water management system has been updated through studies undertaken for the EPL Pollution Reduction Program which are not reflected in the OEMP.
- Dust controls have been updated following the Air Quality Audit report.

It is recommended that the OEMP be updated to reflect the current set of environmental management plans and revised EPL Pollution Reduction Studies. It is also noted that the operator has simplified the main elements of the OEMP, which is considered a necessary action given the large body of written material contained in the OEMP (876 pages) which renders it useless as a site management tool. It is therefore recommended that the updated OEMP contains a simplified list of management actions that need to be undertaken on site to meet the requirements of each management plan. This should include such things as:

- Daily, weekly and monthly site inspection checklists.
- Include required standards, corrective actions and closeout.
- Monthly monitoring schedules.
- Monitoring schedules that lie outside the monthly requirements.
- Incident reporting procedures.

Any changes to the current inspection schedules should be based on simple addition of items to be inspected, improvements in data management and corrective actions but not unduly complicate the current system.

### **3.2.2 Surface Water Monitoring and Mitigation Plan**

The first version of the Surface Water Monitoring and Mitigation Plan (SWMMP) was prepared in April 2017 by Royal Haskoning DHV for consultation purposes and a revised plan lodged with DPE on 7 December 2017. The SWMMP was relodged with DPE on 7 May 2018 as part of the OEMP submission.

The 2017 SWMMP required the site to increase its pollution control storage, improve clean water separation to reduce runoff volume and increase water recycling and reuse. This work was completed by October 2021. The option to install a water treatment plant to enable controlled discharge from site was not implemented.

A separate Surface Water Characterisation Assessment was also prepared by Royal Haskoning in April 2017 which was lodged separately with the EPA under an earlier Pollution Reduction Program condition on EPL 11815. The results of this assessment found that (this Auditor's words based on laboratory results contained in the report):

- Water samples from site ponds are highly alkaline and unsuitable for discharge without either treatment or dilution.

- 
- 
- ❑ Elevated levels of Ammonia and Total Nitrogen.
  - ❑ Elevated metals Aluminium, Chromium IV, Copper and Vanadium.
  - ❑ Elevated solids.

The analysis provided in the Surface Water Characterisation Assessment indicated that hydrocarbons, PAH, Phenols, pesticides and herbicides were generally below laboratory detection levels. There was an isolated detection the phenol 2-Methylphenol, 3&4-methylphenol and 2,4-Dimethylphenol which are known as Cresol which are found in tars. The likely source of these chemicals would be the asphalt stockpiles on site.

The elevated alkalinity resulting in high pH is a result of calcium oxides leaching from concrete products stored on site. The pH detected in the on site dams in 2017 ranged between 7.5 to 10.4 while on site water pH in 2023 ranged from pH 8.5 to 11.1. During discharge events, the reported pH is generally below 8. To meet this level requires the dams to be maintained in a near empty condition to allow dilution from high runoff events. Discharge events to date have generally resulted in acceptable water quality discharged from site, particularly considering the receiving waters of Prospect Creek which also drains other industrial and urban areas, generally having poor water quality. The added pollutant load from the site would result in negligible additional impact.

It is also reported that rainwater can increase pH by allowing leaching through concrete stockpiles on site. This creates a situation where continual light rainfall will result in a gradual deterioration in the quality of the onsite ponds and with the lack of water demand during such times, there is the potential to discharge poor quality water when receiving water quality is good. This situation would result in impacts off site.

To address this potential, it was initially proposed to install an on site treatment plant, largely to control pH and sediment. However it was ultimately not installed as it was not considered to significantly reduce the risk of poor water quality discharges. Instead, the site increased its water storage capacity and recycling initiatives and currently has an impressive array of dust suppression systems installed around the site, largely as a means of reducing the volume of water stored on site.

It is considered that there is still a residual risk that circumstances could arise that the site would discharge poor quality water which would impact receiving water quality. This situation would consist of a dry period when water recycling/dust suppression systems result in pollutants concentrating in the main ponds which is then followed by an extended period of light rainfall which reduces the ability for the dust suppression system to evaporate excess water, leaching from the stockpiles minimises the potential for dilution but the ponds gradually fill and ultimately discharge.

### **3.2.3 Dust Management Plan**

The Air Quality Management Plan is contained in the 2021 OEMP but is dated 12<sup>th</sup> October 2017. The plan covers the main areas of dust control including identifying emission sources, itemising mitigation measures and detailing the required monitoring. In July 2022, an Air Quality Audit report was produced which included an inspection of the facility, observations in relation to dust control and a review of the mitigation measures employed. This Air Quality Audit report concluded that the mitigation measures and performance align with accepted industry best practice and that the air quality predictions made in the EIS are being met. Several air quality

---

---

actions were recommended including a review of the dust monitoring sites, and improvements to the secondary crusher spray system.

One of the two dust gauges was recommended to be relocated closer to residential receivers so as to better determine the impacts of dust off site. This recommendation was partly made due to the fact that both gauges showed dust levels in excess of the criteria and the fact that the criteria is to be met at a receiver location. The data therefore did not provide evidence of compliance.

Both gauges have remained in their original locations. The reason for this is that dust generated at the premises, as measured by these two on site gauges, has significantly reduced over the past three years. Mineral dust levels measured on site is now generally less than 2 g/m<sup>2</sup>/month. This data provides evidence that the site would meet its criteria at the nearest residential receptor.

The reason for the improved dust management on site has been the upgrading of the water management system which requires significant water recycling and reuse to maximise evaporation.

### **3.2.4 Groundwater Management Plan**

A Groundwater Management Plan (GMP) was first prepared and lodged with the Department in the 2017 OEMP. The approval letter from the DPE, specifically stated that the GMP was not approved as it is required to be lodged within 6 months of the commencement of the expanded operations. This was not triggered until November 2021. A revised GMP was prepared on 17<sup>th</sup> May 2022 and lodged with the Secretary of the DPE.

The 2022 GMP provides a summary of the groundwater monitoring data undertaken up to the date of the report. This includes five monthly samples between January and May 2017 and three samples taken between October 2021 and January 2022. Groundwater level data loggers were also installed in 2017 and the data up to May 2022 was reported in the GMP. The GMP includes some assessment of groundwater impacts based on the results up to the preparation of the GMP, but also sets out the proposed ongoing monitoring plan and sets new water quality thresholds.

The results provided in the GMP did not identified any evidence of groundwater impacts due to the operation of the facility. The 2017 GMP identified that the two pollution control ponds which were clay lined, may leak however their upgrade to include HDPE liner appears to have alleviated this concern.

The addition of concrete lined stormwater drains also reduces the potential for subsurface seepage while stockpile dust suppression practices were revised to avoid over saturating stockpiles by irrigation. This latter process increased the alkalinity of runoff entering the pollution control ponds.

The proposed future monitoring program includes annual groundwater monitoring and a reduced set of analytes. These include typical physical parameters, metals, nutrients and Total Recoverable Hydrocarbons. It is considered appropriate to drop analytes which have consistently returned results of below laboratory detection limits.

Thresholds were provided for three key elements, Chromium, Vanadium and Hydrocarbons (as TRH). It is noted however that surface water contaminates above threshold goals included pH,

---

---

Aluminium and Copper along with Chromium and Vanadium. It would be considered prudent that pH, Aluminium and Copper thresholds to be added to the thresholds for further investigation.

### **3.2.5 Noise Management Plan**

The Noise Management Plan (NMP) was prepared by EMM consultants in May 2021. The plan covers noise limits, operational controls and management provisions, noise monitoring, community complaints handling, corrective actions and continuous improvements.

The NMP does not suggest regular noise monitoring but rather only in response to noise complaints or substantial changes in operations. It is understood that noise monitoring is currently conducted annually as a verification process. The annual noise monitoring is undertaken by Muller Acoustic Consulting and their latest report was prepared in November 2023. This round of monitoring confirmed that the Widemere facility is inaudible at the nearest residential receptors.

The NMP and current process of annual noise monitoring is considered current best practice for a facility with low noise risk.

### **3.2.6 Waste Monitoring Plan**

A Waste Monitoring Plan was originally developed in December 2017 and updated in April 2018 and May 2021. The plan covers waste monitoring and tracking of all materials received at the facility and outgoing products. Incident reporting and management provisions are also covered. The plan includes specific actions to be taken and records to be kept covering:

- Customer details including waste type, truck weights and source.
- Inspections of every incoming load at the weighbridge.
- Detailed inspections of loads discharged in the stockpile area before being incorporated into the main incoming waste stream.
- Details of all rejected loads and where the rejection took place (weighbridge or stockpile sorting area).
- Docketing system provides the record of actions and weights.

All inspection staff are trained in the identification of potential asbestos contamination. As there is no specific asbestos testing, in practice, all loads containing visible fibrous materials are rejected. A separate handling method is available for suspected contaminated materials. The primary method is load rejection where the truck is either turned away at the weighbridge or the truck is reloaded following inspection at the tip off area. If the contamination is found after the delivery truck has left the yard, the load will be sprayed with water to suppress dust over the contaminated load, the load is isolated and marked with bollards and the customer is contacted to request pick up of the load.

The training room has evidence that all staff receive regular training in waste identification and classification. The waste management and monitoring system is considered current industry best practice.

---

---

### 3.3 Quality Control Procedures and Tracking

The Widemere facility incorporates a waste tracking system based on the overall Boral Environmental Management System. The EMS seeks to eliminate waste, use energy efficiently, conserve water, prevent pollution and effectively use input resources. Quality control procedures are in place for all finished products while tracking of waste, energy consumption, recycling and employee training provide the basis for continuous improvement. The OEMP also includes measures for safety, risk identification and training for all personnel.

Boral operates an overall EMS system which consists of a Corporate Environmental Policy, Environmental Aspect and Impact Register, Monitoring, record keeping and Measurement Plan, Stakeholder Engagement Plan, Environmental Operating Procedures, Environmental Checklist, Environmental training and Emergency Response Plan. Audits, both internal and external form a part of the company's EMS and objective of continuous improvement. These documents, along with specific site management plans required under the consent, are kept on site.

Boral has also developed an intranet data base which includes training course details, HSEQ Management Dashboard, material tracking systems, registers and production records.

Site specific quality control procedures exist for asbestos identification and testing, monitoring protocol for contamination of incoming materials and product specifications. The Recovered Aggregate Order 2014 also specifies testing required for all products leaving the site. The testing occurs in the raw feed product prior to blending with cement to form finished product. The testing covers a range of metals in Mercury, Cadmium, Lead, Arsenic, Chromium, Copper, Nickel and Zinc, foreign materials such as rubber, plastic, wood etc and overall sample Electrical Conductivity.

The sampling, analysis and data retention meets the required standards. Data and records were made available at the time of this audit.

### 3.4 Monitoring Data Review

Monitoring data exists for monthly dust deposition, monthly water quality contained with the two main pollution control ponds, quarterly groundwater quality and annual attended noise monitoring. All data was made available for this audit. The following observations were made from the data:

- There has been a noticeable improvement in dust deposition as registered in the two on site deposition gauges. This has been attributed to the significant increase in water usage around the site required under the water management plan. This requires maintaining the water volume in the two pollution control ponds as low as practicable.
- Water quality contained in the two pollution control ponds has become more alkaline. In 2015-16 the pH the ponds had a pH of less than 8. In 2021 dam 2 had increased to an average of 9.8. In 2023, the average pH is above 10.
- Groundwater monitoring data has not detected any leakage from the two pollution control ponds.
- Noise monitoring has confirmed that site operations are inaudible from the nearest residential receptors.

---

---

The site monitoring program is considered adequate to identify environmental aspects of concern. The program is considered to meet current industry best practice.

### **3.5 Operational Performance**

Overall the site is considered well managed. The operators understand their environmental obligations and the requirements of the planning consent and Environment Protection Licence (EPL). Internal Boral systems require a range of additional requirements to be undertaken on site in the form of inspections, systems monitoring and training which effectively digests the requirements of the approval conditions and management plans into more simplified regular tasks.

A detailed photographic record of the site inspection is provided in Appendix C while an assessment of current best management practice is provided in Table A3. This table lists the key management practices and pollution controls relevant to resource recovery and construction and demolition waste management guidelines. Out of 133 items on the checklist, only two items were not being undertaken on site. These items were:

- ❑ Non sealing of all internal roadways. This item is listed under dust control measures general and hardstand management. The current unsealed roadways have adequate dust control due to the high application of water, however the progressive sealing of internal roadways has been listed as recommendation for future consideration. It is not necessary for dusts control but rather to reduce turbidity in the pollution control system.
- ❑ No pH or turbidity correction prior to discharge. The reliance on dilution during high rainfall events to avoid impacts of site discharges on receiving waters is not considered current best practice. The reinstatement of the existing on site treatment plant solely for the purposes of treating contained water at risk of discharge forms part of the recommendations from this audit.

Based on the assessment provided, the Widemere facility substantially meets current best practice within the concrete recycling industry.

### **3.6 Notices, Penalties and Prosecutions**

There have been no penalties or prosecutions issued by regulatory authorities since the operation commenced. There are no records of pending action or notices being issued by any government agency. The operation has been subject to notices from the EPA as discussed in the following sections.

#### **3.6.1 Discharge Events**

The site reported a discharge event to the EPA on 27<sup>th</sup> July 2020. This was a result of a surface water storage tank leak. The EPA took no further action in relation to the incident.

Between 18<sup>th</sup> February 2022 to 1<sup>st</sup> April 2022 there were six reported discharge events emanating from the same high rainfall event. This event caused the main pollution control pond to discharge into Prospect Creek. The EPA took no regulatory action in relation to the incident. However, the EPA's concern in relation to the water management system operating at the premises has been demonstrated by the various reviews of the stormwater management system.

---

---

### 3.6.2 Recovered Aggregate Order Audit July 2021

In July 2021 the EPA undertook a compliance audit of the 2014 Recovered Aggregate Order. The site was audited by the EPA as part of a rolling State-wide compliance audit program on industry compliance with resource recovery orders. The audit identified three non-compliances:

- Sampling plan did not include a description of sample preparation and storage procedures. An updated sampling plan was subsequently produced and the EPA advised that the updated plan includes all required information.
- The EPA identified a missing sample on 10/4/2020. The sampling plan was updated and the EPA advised that the matter was now closed out.
- The Pollution Incident Response Management Plan (PIRMP) did not have a plan which showed the location of stormwater drains. The plan has been updated and now includes a plan showing drainage pathways and discharge points.
- The PIRMP did not indicate past test dates. The plan was subsequently updated to include previous testing and the name of the person who carried out the test.

### 3.6.3 EPA Inspection 17 February 2021

The EPA undertook a site audit of the Widemere facility in February 2021 which identified the following issues:

- Inappropriate management of storage of dangerous goods. Drums were found to be overhanging bunded areas and there was evidence of spillage (stains) around the bunded areas.
- Stockpiles were not labelled appropriately.
- No clear delineation of the tip and spread areas and it was observed that new incoming loads were tipped in very close proximity to already inspected stockpiles.

Additional clarification was provided by the EPA in an email dated 18<sup>th</sup> February 2021. This email requested additional information on the dangerous goods stored on site, their location and compliance with AS1940:2017 regarding the storage and handling of dangerous goods.

Boral Resources responded to this audit on 26<sup>th</sup> February 2021 advising of its improvements to the storage of dangerous goods, ground conditions surrounding the oil storage area, modifications made to tip and spread processes and improved signage. Evidence was provided on the improvements implemented to meet the storage and handling requirements specified in AS1940:2017.

### 3.6.4 Pollution Reduction Programs

A Pollution Reduction Program (PRP) was listed on EPL11815 in November 2016. This PRP required the operator to improve the quality of water discharged from the premises and to submit a Surface Water Characterisation Assessment, Surface Water Mitigation and Monitoring Plan and a Surface Water Validation Report. Boral submitted the assessment and monitoring plan on 5 April 2017 however the EPA rejected these as requiring further information to satisfy the PRP. An updated list of studies was provided in June 2020 however the EPA subsequently advised that not all outstanding issues have been addressed. Boral advised on 27 January 2021 that a



---

---

revised plan will be submitted that addressed the EPA concerns. The EPA advised on 24 February that Boral's proposed actions were appropriate.

On 21 July 2021, the EPA wrote to Boral stating that they had not received any further updates to the submitted documentation and that a formal response would be required by 11 August 2021. The required documentation was lodged by the due date which commenced a process of further modification to the EPL.

The EPA provided a draft license variation in September 2022 however Boral did not respond until 13 July 2023. Boral's response suggested some amendments to the revised license conditions. The EPA responded on 25 September 2023 which provided Boral with a second draft of the License variation for comment. This was followed by a response by Boral on 10 October 2023. The EPA provided further correspondence on 13 October agreeing to the suggested amendments and the new revised license came into force on 25 October 2023.

EPL 11815 currently has one outstanding Pollution Study and Reduction Program which is to be satisfied by a report due by 31 August 2024. The program is set out under Condition U1 Water Pollution Management - Validation of implemented mitigation measures which has the following components:

- Condition U1.1 - To ascertain the ongoing effectiveness of the implemented mitigation measures to minimise water pollution during discharge events, the Licensee must undertake monitoring during any discharge events up to 30 June 2024.
- Condition U1.2 - The Licensee must record all overflow events, including the duration of the event, estimated volume of the overflow and associated daily rainfall.
- Condition U1.3 - The discharge from Dam 2 must be sampled daily during overflow events.
- Condition U1.4 - Samples must be analysed in a NATA or equivalently accredited laboratory for;
  - Chromium (VI) (ug/L)
  - Aluminium (ug/L)
  - Copper (ug/L)
- Condition U1.5 - The Licensee must report the results of the monitoring to the EPA by 31 August 2024.
- Condition U1.6 - Where the results indicate a potential impact, the EPA may require the Licensee to undertake further assessment, such as ecotoxicology testing of the discharge.

The nature of this PRP indicates that the EPA is still concerned in relation to the potential for discharges to occur which may impact on receiving waters.

### **3.7 Compliance Status**

The compliance status is documented in Appendix A. A total of 10 non-compliances were noted of which two are new items of non-compliance. Generally, the current and historic non-compliances relate to consultation with agencies during the preparation of the various management plans, ensuring confirmation of approvals from the DPE and similar administrative matters.

It should be noted that one item previously assessed as being non-compliant in the 2020 Independent Environmental Audit has been reassessed as being compliant. Condition C37 requires the sediment basin clay liner to be monitored every three years to ensure its permeability

---

---

status and thickness of clay. As a result of the first inspection, and subsequent preparation of the Surface Water Monitoring and Mitigation Plan, the consultants recommended that the ponds be enlarged and lined with a High Density Polyethylene (HDPE) flexible liner which meets the standard established in Solid Waste Landfill Guidelines (2016). The ponds were upgraded to this standard in mid 2019. The appropriate inspection regime should be aligned with desilting operations of the ponds when the floor of the liner and seams can be inspected.

The current pond lining and inspection regime meets the expectation and intent of Condition C37 and it therefore assessed as being in compliance. To remove any future doubt, the condition should be modified to reflect the current control system.

## 4. Conclusions and Recommendations

---

### 4.1 Audit Conclusions

This audit has demonstrated that the Widemere Waste Recycling facility is well managed and operating within its original assessed level of environmental impact. The site has incorporated current best practice in environmental management as detailed in Table A3.

The audit found there were 16 items of non-compliance of which five are new items of non-compliance. The remaining 9 items were identified in previous audits and, like the current audit, relate primarily to procedural matters such as consultation with listed agencies and obtaining approvals of plans within defined timeframes. These non-compliances would not affect the environmental performance of the operation and appear to have been caused by changes in management personnel, record keeping and confusion in relation to reporting under the Environment Protection Licence and similar reporting under the Development Consent.

The site has recently developed a spreadsheet entitled Widemere Environment Permit Planner which documents each condition of the approval and Environment Protection Licence and documents what actions have been taken to ensure compliance with each and every condition. It also includes the key management items provided in the various management plans, particularly environmental monitoring requirements. The spreadsheet also lists the evidence available for each condition. This provides a significant improvement in the identification of statutory requirements for the site and will in future provide greater confidence that the site is meeting its statutory obligations.

This audit identified some areas where environmental performance could be improved and these are particularly relevant where compliance status requires ongoing assessment of environmental performance. These are listed in the following section.

### 4.2 Audit Recommendations

Recommendations arising from this compliance audit are listed below. The recommendations are not compliance issues but rather observations which Boral should consider over the next audit period.

- ❑ The next Annual Report for the period ending 25<sup>th</sup> November 2023 should include further description of the water management plan improvements, analysis of monitoring data to determine trends and results of waste testing to confirm compliance with the Recovered Aggregate Order.
- ❑ The 2022 Annual Review was produced 8 months after the end of the reporting period (25<sup>th</sup> November). Although the timing for each Annual Review is not specified in the consent, it should be produced no later than 3 months after the end of the reporting period. This would provide government agencies information regarding the operation in a timely manner.
- ❑ Additional groundwater threshold elements be added to the Groundwater Management Plan. These would include pH, Aluminium and Copper along with the existing Chromium, Vanadium and TRH for the purposes of determining if the on site dams are

---

---

leaking or if there are any other impacts to groundwater caused by the operation of the facility.

- ❑ Boral should consider the reinstatement of the water treatment and flocculation system originally proposed by Royal Haskoning DHV in the first Water Management Plan. The plant would only need to operate at times when water recycling and reuse from the pollution control dams is limited due to adverse weather conditions. This would improve water quality within the ponds in the event that a discharge occurs and would meet the expectation of achieving current best management practice.
- ❑ The damaged internal drain along the access road to the batch plant be repaired.
- ❑ Boral should implement a program of progressive sealing of internal roadways. This would reduce the solids loading entering the pollution control ponds as a result of both rainfall and dust control sprays.
- ❑ The current OEMP needs updating to include the latest management plans and monitoring requirements. There have also been internal Boral management changes since the 2021 OEMP was completed. Consideration should also be given to simplifying the document and providing a summary of management actions which can be more easily be incorporated into existing on site inspection checklists and data systems.
- ❑ Ensure systems are in place to keep the Department of Planning and Environment fully aware of any and all matters which affect the environmental performance of the facility in accordance with Condition D5.
- ❑ Boral should commission the independent Surface Water Audit on the development in accordance with condition C46 and to ensure appropriate consultation with the EPA and DPE.
- ❑ The Surface Water Management and Monitoring Plan should be updated on completion of the Surface Water Validation Report and approval of the revised document sought from DPE in accordance with condition C43(b).

## Appendix A – Audit Compliance Status Tables

Table A1 – SSD 6525

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	<b>SCHEDULE B : ADMINISTRATIVE CONDITIONS</b>			
B1	<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b>			
	In addition to meeting the specific performance criteria established under this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the Development.	Audit conclusions and opinion	Boral has demonstrated that it has a system in place to ensure ongoing compliance with its consent obligations	Compliant
B2	<b>TERMS OF CONSENT</b>			
	The Applicant shall carry out the Development in accordance with the:			
	(a) EIS;	Audit conclusions and opinion	The development is being carried out in accordance with the EIS	Compliant
	(b) RTS;	Audit conclusions and opinion	The development is being carried out in accordance with the RTS	Compliant
	(c) Development layout plans and drawings in the EIS (see Appendix 1); and	Consent Document	The development is being carried out in accordance with the development plans	Compliant
	(d) the Management and Mitigation Measures (see Appendix 2).;	Consent Document	The development is being carried out in accordance with the Management and Mitigation Measures	Compliant
B3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	Audit conclusions and opinion	There have been no changes to the consent however the management and mitigation measures are progressively updated as a result of the EPA licence PRP process	Compliant
B4	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of:	Noted		
	(a) any reports, plans or correspondence that are submitted in accordance with this consent; and	33-	There is evidence of consultation with the EPA and DPE in relation to the various management plans required under the consent. The operation has already completed the original set of management plans and responded to the Secretary in relation to matters arising	Compliant
	(b) the implementation of any actions or measures contained within these reports, plans or correspondence.	33-	Actions have been implemented and documented	Compliant
B5	<b>LIMITS OF CONSENT</b>			
	This consent lapses five years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under section 95 of the EP&A Act.	Noted		Not triggered
B6	The Applicant shall not receive or process on the site more than 1,000,000 tonnes of waste (as expressly permitted by an EPL) per year.	27 (Table 8) 28 (Table 7) 29 (Table 6)	795,340 t material received in 2023 (up to audit period) 778,653 t material received in 2022 818,062 t material received in 2021 597,697 t material received in 2020	Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
B7	The Applicant shall not cause, permit or allow any materials or waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by an EPL.	7-11	Loads are inspected at the weighbridge and dumping areas by spotters and reject records are kept. Annual reviews and waste records reviewed show impermissible waste is rejected.	Compliant
B8	Virgin excavated natural material (VENM), timber, metal, plastic, glass, paper and cardboard, tree cuttings and tree trunks when mixed with inert waste may only comprise up to 20% by mass of all stockpiles on the site at any one time.	Site inspection 3, 7-10	Sighted foreign materials test results, waste records show composition of rejection	Compliant
B9	Stockpiles of permitted waste and recycled product shall not be more than 20 metres above ground level.	Site inspection	Stockpiles below height maximum limit upon inspection. Checked monthly against 19m tall silo on site.	Compliant
B10	<b>STAGED SUBMISSION OF PLANS OR PROGRAMS</b>			
	With the approval of the Secretary, the Applicant may:			
	(a) submit any strategy, plan or program required by this consent on a progressive basis; and/or	NA	Boral has not submitted any strategy, plan or program on a progressive basis.	Not triggered
	(b) combine any strategy, plan or program required by this consent.	NA	Boral has not combined any strategy, plan or program.	Not triggered
B11	If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program shall clearly describe the specific stage to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program. A clear relationship between the strategy, plan or program that is to be combined shall be demonstrated.	NA	No progressive submissions of strategies, plans or programs have occurred.	Not triggered
B12	<b>EVIDENCE OF CONSULTATION</b>			
	Where consultation with any public authority is required by the conditions of this consent, the Applicant shall:			
	(a) consult with the relevant public authority prior to submitting the required documentation to the Secretary or the PCA for approval, where required;	4 10, 11, 12	The previous audit noted several instances where either the EPA or DPE were not consulted as required by the consent. Consultation has continued with agencies however this cannot correct the earlier omissions and therefore this condition remains as non-compliant	Non-Compliant
	(b) submit evidence of this consultation as part of the relevant documentation required by the conditions of this consent; and	4	The previous audit identified several instances where evidence of consultation was not submitted to the DPE. An additional item of failure to provide documentation to DPE occurred as a result of the discharge event which was reported to the EPA but not DPE.	Non-Compliant
	(c) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant or any person acting on this development consent.	4	The previous audit identified several instances where evidence of consultation was not submitted to the DPE. An additional item of failure to provide documentation to DPE occurred as a result of the discharge event which was reported to the EPA but not DPE.	Non-Compliant
B13	<b>DISPUTE RESOLUTION</b>			
	In the event that a dispute arises between the Applicant and Council or a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the development, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.	NA	No disputes have occurred with Council or public authority.	Not triggered
B14	<b>STATUTORY REQUIREMENTS</b>			

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	The Applicant shall ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.			
B15	<b>METEOROLOGICAL MONITORING</b>			
	Within 3 months of the date of this consent., the Applicant shall ensure that there is a suitable meteorological station on the site that complies with the requirements in the latest version of the Approved Methods for Sampling of Air Pollutants in New South Wales. The meteorological station must be operated and maintained for the life of the Development	Site inspection and view of monitoring data	Unit installed within the three month limit and is generally working correctly. There has been periods when data is unavailable due to electrical faults	Compliant
B16	<b>UTILITIES AND SERVICES</b>			
	Prior to the construction of any utility works associated with the Development, the Applicant shall obtain relevant approvals from service providers.	N/A	NA	Not triggered
B17	<b>COMPLIANCE</b>			
	The Applicant shall ensure that employees, contractors and sub-contractors are aware of, and comply with, the conditions of this consent relevant to their respective activities.			
B18	The Applicant shall be responsible for environmental impacts resulting from the actions of all persons that it invites onto the site, including Contractors, subcontractors and visitors.	Site inspection and evidence from training room documents	Training materials were sighted during the audit and considered appropriate and fit for task	Compliant
B19	The Secretary at any time may require an update on compliance with all, or any part, of the conditions of this consent. Any such update shall meet the requirements of the Secretary and be submitted within such period as the Secretary may agree.	Site inspection and management interview	No requests have been received. This independent environmental audit provides an update on compliance with the conditions of consent.	Compliant
B20	The Applicant shall meet the requirements of the Secretary in respect of the implementation of any measure necessary to ensure compliance with the conditions of this consent, and general consistency with the EIS and those documents listed under Condition D2. The Secretary may direct that such a measure be implemented in response to the information contained within any report, plan, correspondence or other document submitted in accordance with the conditions of this consent, within such time as the Secretary may agree	17	Condition D2 lists the OEMP as being required prior to operations commencing. Two versions have been produced however the current version needs to be updated as it was prepared in May 2021 and there has been more recent component management plans	Compliant
B21	<b>OPERATION OF PLANT AND EQUIPMENT</b>			
	The Applicant shall ensure that all plant and equipment used for the Development is:			
	(a) maintained in a proper and efficient condition; and	Site inspection and management interview	Boral uses the Maximo asset management system which provides schedules for all required maintenance activities	Compliant
	(b) operated in a proper and efficient manner.	Site inspection and management interview	Boral uses the Maximo asset management system which provides schedules for all required maintenance activities	Compliant
B22	<b>DEVELOPMENT CONTRIBUTIONS</b>			
	The Applicant must pay a levy of the percentage authorised by Fairfield City Council Indirect (Section 94A) Development Contributions Plan 2011, of the proposed cost of carrying out the development. The levy must be paid prior to the commencement of the expanded operations. A copy of the receipt for the payment must be submitted to the Department within two months of payment. The amount of the levy that is payable to Council, calculated as at the date of the grant of this development consent is \$1,641.12.	5, Site inspection and management interview	The contribution was paid on 19/1/2017. There is no need for any further payment. The levy was in response to the original grant of SSD6525	Compliant
B23	<b>NOTIFICATION AND SURRENDER OF CONSENT</b>			

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	Prior to the commencement of the expanded operations, the Applicant shall provide written notification in the manner prescribed by Clause 97 of the Environmental Planning and Assessment Regulations 2000, and surrender the following consent:			
	(a) DA No. 21-1-2002-1 granted by the Minister for Planning on 25 November 2002 for the construction and operation of a construction materials recycling facility.		letter from Boral dated 06/03/2018 notifying DPE of the intent to surrender DA 21-1-2002-1 was provided	Compliant
	<b>SCHEDULE C: ENVIRONMENTAL PERFORMANCE AND MANAGEMENT</b>			
C1	<b>WASTE MANAGEMENT AND MONITORING PROGRAM</b>			
	The Applicant shall prepare a Waste Monitoring Program for the Development. This program must:	7	Waste Monitoring Plan prepared with appropriate consultation. The plan has been updated since originally prepared	Compliant
	(a) be prepared in consultation with the EPA by a suitably qualified and experienced expert within 3 months of the date of this consent;	5	The previous audit identified that the original Waste Management Plan was not prepared within 3 months of the consent	Non-compliant
	(b) include suitable provision to monitor the: (i) quantity, type and source of waste received on site; and (ii) quantity, type and quality of the outputs produced on site.	5	The current plan covers each provision	Compliant
	(c) ensure that: (i) all waste that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; and (ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.	5	The current plan covers each provision	Compliant
C2	The Applicant shall carry out the Development in accordance with the Waste Monitoring Program approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Site inspection and interviews	Evidence provided on site demonstrated a commitment to implementation of the waste monitoring program	Compliant
	<b>NOISE AND VIBRATION: CONSTRUCTION AND OPERATION HOURS</b>			
C3	The Applicant shall comply with the construction and operation hours in Table 1 unless otherwise agreed to in writing by the Secretary	Site interview and weighbridge records	Work hours are being met and documented in each Annual Review	Compliant
C4	The Applicant must keep a record of Sunday works as identified in Table 1.			
C5	Condition C3 does not apply to any activity that is required to be performed by police or other authorities for safety reasons; and/or if there is an on-site emergency that poses an immediate danger to personnel or equipment; and/or the operation or personnel or equipment is endangered. In such circumstances, prior notification shall be provided to the EPA and any affected residents as soon as possible, or within a reasonable period in the case of emergency.	Site interview and weighbridge records	Work hours are being met and documented in each Annual Review. No work outside permitted hours during the audit period	Compliant
	<b>NOISE AND VIBRATION: OPERATIONAL NOISE LIMITS</b>			
C6	The Applicant shall ensure noise from the operation does not exceed the limits in Table 2	13	Noise monitoring program demonstrates the site is inaudible and nearest residential receptor	Compliant
	<b>NOISE AND VIBRATION MONITORING</b>			
C7	The Applicant shall carry out noise and/or vibration monitoring in accordance with any requirements in the EPL. This shall include verification that the facility is operating in accordance with the criteria outlined in Condition C6.	13	Noise monitoring program demonstrates the site is inaudible and nearest residential receptor	Compliant



Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	<b>NOISE AND VIBRATION: VIBRATION CRITERIA</b>			
C8	The Applicant shall ensure that vibration resulting from the development does not exceed the continuous or impulsive vibration criteria in the EPA's Assessing Vibration: A Technical Guideline (February 2006) at residential receivers.	13	Noise monitoring program demonstrates the site is inaudible and nearest residential receptor	Compliant
	<b>NOISE AND VIBRATION: NOISE MITIGATION</b>			
C9	The Applicant shall:			
	(a) implement best management practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the development;	13	Noise Management Plan in place. Noise monitoring program demonstrates the site is inaudible and nearest residential receptor	Compliant
	(b) minimise the noise impacts of the development during adverse meteorological conditions;	13	Noise monitoring program demonstrates the site is inaudible and nearest residential receptor	Compliant
	(c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and	13	Noise monitoring program demonstrates the site is inaudible and nearest residential receptor	Compliant
	(d) regularly assess any noise monitoring data and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.	13, 27, 28, 29	Noise monitoring program demonstrates the site is inaudible and nearest residential receptor	Compliant
	<b>NOISE AND VIBRATION: NOISE MANAGEMENT</b>			Compliant
C10	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Noise Management Plan. The Plan must:	5	Noise Management Plan prepared by EMM dated 22 February 2018	Compliant
	(a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA;	5	Original consultation acceptable to previous auditor	Compliant
	(b) be approved by the Secretary prior to the commencement of the expanded operations;	5	Original consultation acceptable to previous auditor	Compliant
	(c) include up to date site plans;	5	Figure 3.1 of NMP	Compliant
	(d) identify all major sources of noise that may be emitted as a result of the operation of the Development;	5	NMP includes major sources of noise that may be emitted as a result of the operation of the development	Compliant
	(e) specify the noise criteria as it applies to the particular activity;	5	Section 2 of NMP	Compliant
	(f) include procedures for the monitoring of noise emissions from development, in accordance with any requirements of the EPL;	5	Noise emission criteria acceptable	Compliant
	(g) include protocols for the minimisation of noise emissions including deployment of the noise mitigation measures outlined in Condition C9;	5	Protocols provided. Noise monitoring shows compliance demonstrated mitigation measures effective	Compliant
	(h) describe the procedures to be undertaken if any non-compliance is detected; and	5	Procedures defined	Compliant
	(i) detail the mechanisms to consider and address cumulative noise impacts in the context of development in the Greystanes Estate/ Widemere Area.	5	Procedures defined. Noise monitoring shows compliance demonstrated mitigation measures effective.	Compliant
C11	The Applicant shall carry out the Development in accordance with the Noise Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	5, site inspection and review of noise monitoring data	Noise monitoring shows compliance demonstrated mitigation measures effective.	Compliant
	<b>AIR QUALITY</b>			
C12	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	14, 17, 26, site inspection	Monitoring data demonstrates compliance and gradual improvement over the past 3 years	Compliant
C13	The Applicant shall carry out all reasonable and feasible measures to minimise dust generated by the Development.	14, 17, 26, site inspection	Monitoring data demonstrates compliance and gradual improvement over the past 3 years. Dust mitigation measures have expanded due to water recycling project	Compliant
C14	The Applicant shall carry out air quality monitoring in accordance with any requirements in the EPL.	14, 17, 26, site inspection	Monitoring data demonstrates compliance and gradual improvement over the past 3 years	Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
C15	The Applicant shall ensure the development complies with any air quality limits in the EPL	14, 17, 26, site inspection	Monitoring data demonstrates compliance and gradual improvement over the past 3 years. All criteria are met.	Compliant
	<b>AIR QUALITY MITIGATION</b>			
C16	The Applicant shall:			
	(a) operate the Development so that air emissions are minimised during all meteorological Conditions;	Site interviews	Use of sprinklers throughout the facility based on water evaporation requirements rather than specific meteorological conditions, however effect is the same.	Compliant
	(b) implement best management practice, including all reasonable and feasible air emissions mitigation measures to minimise emissions from the Development. including but not limited to: (i) limiting vehicle speed on-site to 30 kilometres per hour; (ii) ensuring all loaded vehicles entering or leaving the site have their loads covered; (iii) ensuring all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads; and (iv) dust sprays through chemical suppressants, water sprays/misters.	14, 17, 26, site inspection	Use of sprinklers throughout the facility based on water evaporation requirements rather than specific meteorological conditions, however effect is the same.	Compliant
	<b>DUST MANAGEMENT</b>			
C17	As part of the OEMP for the Development, required under Condition D2 of this consent, the Applicant shall prepare a Dust Management Plan. The Plan must	14, 26	Dust Management plan and Air Quality Audit form the main air quality planning documents	Compliant
	(a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA;	14, 5	Documentation reported in previous audit	Compliant
	(b) be approved by the Secretary prior to the commencement of the expanded operations;	14, 5	Documentation reported in previous audit	Compliant
	(c) identify all major sources of dust that may occur as result of the operation of the development;	14, 5, site inspection	Dust management on site is effective and augmented by water recycling initiatives	Compliant
	(d) describe the procedures to manage the emission of dust from the sources identified;	14, 5	Contained in reporting	Compliant
	(e) identify the locations where monitoring of dust emissions is to be undertaken;	14, 5, site inspection	Contained in reporting	Compliant
	(f) describe the procedures for the monitoring of dust emissions from the development, in accordance with any requirements of the EPL;	14, 5, site inspection	Dust management on site is effective and augmented by water recycling initiatives	Compliant
	(g) provide protocols for regular maintenance of process equipment to minimise the potential for dust emissions;	14, 5, site inspection	Dust management on site is effective and augmented by water recycling initiatives. Computer management systems in place	Compliant
	(h) detail the deployment of the mitigation measures identified in Condition C16; and	14, 5, site inspection	Contained in management plan. Dust management on site is effective and augmented by water recycling initiatives	Compliant
	(i) describe the procedures to be undertaken if any non-compliance is detected.	14, 5, site inspection	Dust management on site is effective and augmented by water recycling initiatives	Compliant
C18	The Applicant shall carry out the Development in accordance with the Dust Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary	14, 5, site inspection	Dust management on site is effective and augmented by water recycling initiatives	Compliant
	<b>AIR QUALITY AUDIT</b>			

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
C19	The Applicant shall carry out an Air Quality Audit of the Development no later than six months after the commencement of the expanded operations. The audit must	26	Prepared by EMM and dated July 2022 which is two months outside the 6 months of consent trigger being November 2021, however Boral approached the DPE for endorsement of EMM April 2022 which is within the six month period stipulated. As the consultant was commissioned within the six month timeframe, this condition is considered in compliance.	Compliant
	(a) be carried out by a suitably qualified and experienced expert whose appointment has been endorsed by the Secretary;	26	Appointment letter from DPE sighted, contained in Air Quality Audit Report	Compliant
	(b) audit the Development whilst it is in operation;	26	Audit carried out while site fully operational	Compliant
	(c) include a summary of air emission related complaints and any actions that were carried out to address the complaints;	26	Summary of emissions provided	Compliant
	(d) validate the Development against air quality and odour predictions in the EIS;	26	Predictions validated	Compliant
	(e) review design and management practices of the Development against industry best practice for air emissions; and	26	Assessment of current best practice made and confirmed	Compliant
	after the commencement of the expanded operations. The audit must (f) include an action plan that identifies and prioritises additional air and mitigation measures that may be necessary to reduce air emissions.	26	Action list required and work completion confirmed	Compliant
C20	Within three months of commissioning this audit, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	60, 61	The Air Quality Audit was completed in July 2022 and lodged with DPE in November 2022. Although the wording of this condition states that it should be lodged within 3 months of commissioning, this would not be practical nor in line with the intent of the condition. The response letter from DPE did not indicate that the lodgement of the document did not meet with the timing expectation of this condition.	Compliant
C21	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Air Quality Audit.	60, 61	Boral advised that it was to implement all air quality audit recommendations	Compliant
	<b>SOIL AND WATER: POLLUTION OF WATERS</b>			
C22	The Development shall comply with Section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.	Site Interviews, EPL review	Discharges have occurred during high storm events with adequate mixing to avoid environmental harm to Prospect Creek. This audit makes recommendations to improved the water management and pollution control system	Compliant
C23	Any discharge or water quality criteria specified under the EPL must be complied with	Site Interviews, EPL review	Discharges occur under the requirements of the EPL and Pollution Reduction Program requirements	Compliant
C24	Surface water must only be discharged from the location specified in the EPL	Site Interviews, EPL review	Discharges occur under the requirements of the EPL and Pollution Reduction Program requirements	Compliant
C25	Discharges of turbidity and/or suspended solids to waters from discharge point identified in condition EPL is only permitted when the discharge occurs solely as a result of rainfall at the premises exceeding a total of 45 millilitres over any consecutive 5-day period	Site Interviews, EPL review	This condition has been lifted to 120 mm in the EPL. The consent should be amended to reflect the EPL	Compliant
C26	The Applicant shall undertake water quality monitoring at the discharge point and in accordance with the monitoring requirements described under this consent and the EPL.	Site Interviews, EPL review	Discharges occur under the requirements of the EPL and Pollution Reduction Program requirements	Compliant
	<b>SOIL AND WATER: EROSION AND SEDIMENT CONTROL</b>			

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
C27	All soil and/or vegetation disturbed or removed from the site shall be disposed of to, or stored at, an appropriate location where it cannot be washed off the site.	5	Boral previously advised that no soil was removed during construction	Compliant
C28	All construction vehicles exiting the site, having had access to unpaved areas, shall depart via a Wheel-wash facility.	Site inspection	Wheel wash still in place and operating effectively	Compliant
C29	The Applicant shall implement erosion and sediment control measures during construction in accordance with Landcom's Managing Urban Stormwater: Soils and Construction guideline.	Site Interview	CEMP was in place for the construction phase	Compliant
	<b>SOIL AND WATER: BUNDING</b>			
C30	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded storage areas in accordance with the requirements of all relevant Australian Standards and the EPA's Storing and Handling Liquids: Environmental Protection - Participants Manual 2007	Site inspection	Appropriate storages in place and inspected	Compliant
	<b>SOIL AND WATER: SITE DRAINAGE AND SURFACE WATER MANAGEMENT</b>			
C31	Within six months of the expanded operations, the Applicant shall provide certification from a suitably qualified engineer that the internal surfaces of the surface water detention basins have been maintained to the equivalent to, or better than, a clay liner with a permeability of $1 \times 10^{-9}$ ms: 1 or less and a thickness of no less than 900 mm and whether any repairs are necessary. The documentation of the certification shall be provided to the EPA; and Secretary.	Site Inspection, 16, 18, 29	Ponds are now lined with HDPE liner which has a lower permeability than the original clay. The assessment was undertaken which resulted in the clay liner being upgraded to HDPE	Compliant
C32	Should the certification as per Condition C31 identify that repairs are required, these repairs shall be carried out within two months of the certification.	Site Interview	Repairs were not recommended but rather a complete change from clay to HDPE	Compliant
C33	The Applicant shall maintain all surface water infrastructure to direct all surface water runoff to the site's surface water detention basins.	21, site inspection	The site inspection covered all dirty water drainage lines and concluded that runoff is correctly directed to ponds	Compliant
C34	Only water contained in the site's secondary surface water detention basin (sediment basin 2 - as identified in Appendix 1) is permitted to be applied to land and stockpiles within the site. Spray from the application of this water must not drift beyond the boundary of the area to which it is applied.	Site inspection	Dust suppression using water recycled from the pollution control ponds is a key feature of the water management plan and necessary to reduce water contained in the ponds.	Compliant
C35	The Applicant shall maintain the surface water detention basins on site with a minimum capacity to contain 45 millilitres of rainfall over any consecutive 5 day period. The capacity requirements of the sediment basins may be modified by the EPL.	EPL	This has been increased to 120 mm	Compliant
C36	The Applicant shall ensure that a visible marker is installed in each sediment retention basin in a position that shows the freeboard in the basin that equates to the volume required to contain all rainfall and runoff in the catchment from a 45 millilitre rainfall event over any consecutive 5 day period or as modified by the EPL	Site Inspection	Free board is provided by the visible markers in Pond 2. Runoff containment has now been increased to 120mm under the EPL	Compliant
C37	The sediment basin liner shall be monitored every 3 years to ensure a clay liner of permeability of $1 \times 10^{-9}$ ms-1 or less and a thickness of no less than 900 mm is maintained.	Site Interviews and inspection.	The previous audit incorrectly noted this condition as non compliant since the clay liner was not monitored every three years. However, following the first inspection it was found to be insufficient and was replaced with an HDPE liner. As part of the SWMP, the ponds were also found to be too small and needed to be enlarged. This audit recommends that the condition be modified to reflect the current HDPE liner. The liner should be inspected following dam desilting.	Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	<b>SOIL AND WATER: GROUNDWATER</b>			
C38	Within six- months of the commencement of the expanded operations. The Applicant shall conduct a Groundwater Monitoring Program. The program must:	6, 15, 20, 31	The original Groundwater Monitoring Program was developed in 2017 and then updated in May 2021	Compliant
	(a) be carried out by a suitably qualified and experienced expert in consultation with the EPA and to the satisfaction of the Secretary;	6, 15, 20, 31	The original GMP was not approved however the second version was	Compliant
	(b) assess the potential for leakage of the sediment basins to groundwater;	6, 15, 20, 31	The monitoring program covers leakage detection	Compliant
	(c) detail baseline data, groundwater levels and quality against the relevant criteria;	6, 15, 20, 31	Baseline monitoring has occurred and now undertaken quarterly	Compliant
	(d) provide mitigation and contingency measures to prevent the sediment basins from leaking; and	6, 15, 20, 31	No mitigation strategies have been needed	Compliant
	(e) identify further groundwater monitoring if required.	6, 15, 20, 31	No further monitoring or expansion of the program is necessary	Compliant
C39	Within three months of the completion of the Groundwater Monitoring Program, the Applicant shall submit a copy of the Groundwater Monitoring Program as identified in Condition C38 to the Secretary and the EPA	6, 15, 20, 31	Evidence sighted of consultation with the EPA	Compliant
C40	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Groundwater Monitoring Program.	6, 15, 20, 31	Comments provided and incorporated	Compliant
	<b>SOIL AND WATER: SURFACE WATER MITIGATION AND MONITORING PLAN</b>			
C41	Prior to any controlled discharges permitted under the EPL the Applicant must provide a Surface Water Mitigation and Monitoring Plan, the plan must:	16, 17, 21	Multiple correspondence available covering discharges	Compliant
	(a) be prepared by a suitably qualified and experienced expert;		Qualifications provided	Compliant
	(b) be approved by the Secretary in consultation with the EPA;	Site Interview, auditor opinion, 66	Original SWMMP contained correspondence from the EPA (22 December 2016, 21 July 2021) and from Boral 7 January 2021 to demonstrate consultation and ultimate approval through the issuing of a PRP and then satisfactory renegotiation of a new PRP in 2023. Evidence provided of consultation with DPE. Approval from DPE for the OEMP 2021 is still pending.	Compliant
	(c) provide a description and map of the surface water processes and surface water management infrastructure;	16, 17, 21	Map and documents provided	Compliant
	(d) outline the measures to control and manage surface water (including erosion and sedimentation) associated with the Development;	16, 17, 21	Provided in all documents, minor amendments were made between Version 1 and Version 9	Compliant
	(e) detail how water used for dust depression will be managed to ensure excessive run-off is not generated at the site;	16, 17, 21	Details provided in all documents, minor amendments were made between Version 1 and Version 9	Compliant
	(f) consider the human health risks associated with the surface water reuse process at the site;	16, 17, 21	Updates made between Version 1 and Version 9	Compliant
	(g) include details of the maintenance procedures of the sediment basins and surface water infrastructure;	16, 17, 21	Details provided in all documents, minor amendments were made between Version 1 and Version 9	Compliant
	(h) describe the procedures for maintaining vegetation along surface water channels and detention systems, to minimise the potential for erosion;	16, 17, 21	Details provided in first document, no vegetation clearing occurred during construction	Compliant
	(i) provide details and outcomes of the water balance review and water quality characterisation as required by the EPL;	16, 17, 21	Details provided in all documents, minor amendments were made between Version 1 and Version 9	Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	(j) identify and justify practical measures that could be deployed at the site to minimise water pollution;	16, 17, 21	Details provided in all documents, minor amendments were made between Version 1 and Version 9. One change of note was the removal of the water treatment plant	Compliant
	(k) identify preferred mitigation measures along with timeframes for implementation;	16, 17, 21	Details provided in all documents, minor amendments were made between Version 1 and Version 9	Compliant
	(l) establish an ongoing runoff discharge monitoring program to validate the proposed mitigation measures;	16, 17, 21	Details provided in all documents, minor amendments were made between Version 1 and Version 9	Compliant
	(m) identify measures for managing pollutant exceedances;	16, 17, 21	Details provided in all documents, minor amendments were made between Version 1 and Version 9	Compliant
	(n) identify contingency options to account for any mitigation measures that do not adequately address the site water pollution risks;	16, 17, 21, 16, 17, 21	Pollution risks provided in all documents, minor amendments were made between Version 1 and Version 9	Compliant
	(o) include a review and justify the flocculants and coagulants used on-site; and	16, 17, 21	Currently no flocculants used however this audit recommends that the treatment for pH and use of flocculants be reconsidered as a risk reduction strategy	Compliant
	(p) conduct a review of the methods and chemicals used for pH adjustment in sediment basin.	16, 17, 21	Currently no pH correction chemicals used however this audit recommends that the treatment for pH and use of flocculants be reconsidered as a risk reduction strategy	Compliant
C42	The Applicant shall carry out the Development in accordance with the Surface Water Mitigation and Monitoring Plan (including the implementation of mitigation measures) approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary	Site inspection and interviews	The surface water management system has been well integrated into the site management and evidence during the site inspection	Compliant
	<b>SOIL AND WATER: WATER QUALITY VALIDATION</b>			
C43	Within three months of implementing the Surface Water Mitigation and Monitoring Plan, the Applicant shall provide a Surface Water Validation Report, which shall;	21		Compliant
	(a) be carried out by a suitably qualified and experienced expert;	21	The Water Characterisation report was conducted by suitably qualified consultants known to the auditor	
	(b) be approved by the Secretary in consultation with the EPA;	21, site interviews	The Water Characterisation report was provided to the EPA for comment and there was some reiteration in regard to content however there is no evidence of approval from DPE although no timeframe for approval from the DPE is specified.	Compliant
	(c) detail the results of the Surface Water Mitigation and Monitoring Plan;	27, 28, 29	Results of water monitoring is provided in the Annual Review	Compliant
	(d) provide a characterisation of the water quality discharged in accordance with ANZECC (2000) assessment criteria;	21	Water characterisation contained along with ANZECC triggers	Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	(e) ensure surface water is being managed in accordance the EPL;	21, site interviews	There is evidence sighted for correspondence with the EPA and resulting PRPs provided on the EPL	Compliant
	(f) provide an assessment of the effectiveness of implemented mitigation measures;	21	Effectiveness detailed in the report however, the reporting provides for pH correction and flocculation which is not currently employed on site.	Compliant
	(g) confirm that the site water balance including validation of the sediment pond storage and predicted discharge volume is consistent with the potential pollutant risks;	21, 30	Updated water discharge data and site water balance provided in 2020 as part of the PRP conditions	Compliant
	(h) if necessary, propose additional mitigation measures to control and/or treat all pollutants that represent a risk of non-trivial harm; and	30	No additional treatment or mitigation measures proposed	Compliant
	(i) update the Surface Water Mitigation and Monitoring Plan to reflect any changes to the surface water management system.	21, 30, 27, 28, 29	The SWMMP has been updated several times to reflect changes in the water management system	Compliant
C44	Any alterations to the surface water management system identified in the Surface Water Validation Report must be implemented prior to any further controlled discharges to the satisfaction of the Secretary.	Auditor opinion	There have been no discharges in recent years, however the Characterisation report specifies the use of a water treatment plant which is no longer being used. This was subsequently withdrawn from the current version of the SWMMP. It is recommended that an updated Water Quality Validation Report be prepared which specifically addresses	Compliant
C45	The Applicant must comply with any amended water quality criteria and discharge limits identified in the EPL.	21, 30, 27, 28, 29	Progressive changes have been made in response to reporting to the EPA on the PRP conditions	Compliant
	<b>SOIL AND WATER: SURFACE WATER AUDIT</b>			
C46	The Applicant shall carry out an independent Surface Water Audit of the Development, in consultation with the EPA, following completion of the Surface Water Validation Report or as directed by the Secretary. The audit must:	Auditor opinion	This document has not been prepared however there has been some confusion with the approval path of the surface water management plan as it was contained in the original EPA licence PRP. The intent of the PRP conditions is very similar to the consent requirements but the documents have differing names and slightly different scope. The new PRP was only granted in November 2023 signalling the approval of the original PRP. Therefore, condition C46 has been determined as not being triggered. This audit has recommended that the surface water audit be carried out over the next 12 months	Not Triggered
	(a) be carried out by a suitably qualified and experienced expert whose appointment has been endorsed by the Secretary;			Not Triggered
	(b) audit the Development whilst it is in operation;			Not Triggered
	(c) validate the development against the Surface Water Mitigation and Monitoring Plan;			Not Triggered
	(d) include a summary of any EPL water quality exceedances;			Not Triggered

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	(e) review design and management practices of the Development against industry best practice for surface water;			Not Triggered
	(f) include an action plan that identifies and prioritises additional surface water mitigation measures and/or treatment options that may be necessary to reduce surface water impacts; and			Not Triggered
	(g) provide a further program of monitoring to address water quality issues that may emerge over time			Not Triggered
C47	Within three months of commissioning this audit, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.			Not Triggered
C48	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Surface Water Audit			Not Triggered
	<b>CONTAMINATION</b>			
C49	Prior to the commencement of construction of the realigned haul road as identified in Appendix 1, the Applicant shall prepare an unexpected finds protocol to ensure that potentially contaminated material is appropriately managed. Any material identified as contaminated shall be disposed offsite, with the disposal location and results of testing submitted to the Secretary, prior to its removal from the site.	5	Previously assessed as not being complied with. No further action required	Non-Compliant
C50	The Applicant shall implement the unexpected finds protocol developed under Condition C49 for the duration of construction works	5	Previously assessed as non-compliant. No further action required	Non-Compliant
	<b>TRAFFIC AND PARKING</b>			
C51	The Applicant shall maintain provision for 37 car parking spaces on the site. The spaces must conform to the relevant specifications in the latest version of Australian Standard 2890.1	Site inspection	A total of 38 car spaces current available	Compliant
C52	Accessible, visitor and service vehicle parking spaces must be clearly signposted and designated in accordance with the relevant Australian Standards	Site inspection	Signs were observed showing visitor and disabled parking spaces and areas. Service vehicles park adjacent to plant and equipment requiring maintenance	Compliant
	<b>TRAFFIC AND PARKING: OPERATING CONDITIONS</b>			
C53	The Applicant shall ensure that:			
	(a) the Development does not result in any vehicles parking or queuing on the public road network;	Site inspection, interviews	Protocol available to avoid vehicles queuing. This includes bringing trucks into the site for later inspection	Compliant
	(b) the realigned haul road (as identified in Appendix 1) is constructed and maintained in accordance with the relevant Australian Standards;	4, 5	Construction complete and assessed as compliant	Compliant
	(c) all vehicles are wholly contained on site before being required to stop;	Site inspection	All vehicles are able to wholly access the site, additional space available to bring in extract trucks if needed	Compliant
	(d) all loading and unloading of heavy vehicles is carried out on-site, in particular, all materials when first received at the site shall be unloaded at the receivals area in the north of the site as identified in Appendix 1;	17, site inspection	All loading and receivals occur in designated areas	Compliant
	(e) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times;	17, site inspection	No obstacles were observed near parked cars	Compliant
	(f) all heavy vehicles associated with the Development have their loads covered and do not track dirt onto public roads;	17, site inspection	All loads covered when entering and exiting the site. Covers are removed for inspection at weighbridge	Compliant
	(g) all vehicles enter and leave the site in a forward direction; and	17, site inspection	Observed during site inspection	



Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	(h) all vehicles exiting the site, that have accessed unpaved areas, shall depart via a wheel wash facility.	17, site inspection	Observed during site inspection	
	<b>TRAFFIC AND PARKING: DRIVER CODE OF CONDUCT</b>			
C54	The Applicant shall implement a Driver Code of Conduct for heavy vehicle drivers associated with the Development. The code must	17, 62	Driver code of conduct in place	
	(a) be submitted to and approved by the Secretary within 3 months of the commencement of the expanded operations;	Site interviews and data review	No evidence available to demonstrate that the existing Transport Code was provided to the DPE for approval	Non-Compliant
	(b) be distributed to all the drivers of heavy vehicles associated with the Development; and	62, Interview	Evidence provided that it has been distributed to all drivers and suppliers	
	(c) include provisions relating to: (i) the approved haul routes; (ii) the operating conditions; (iii) the maintenance of engine noise and pollution control equipment; and (iv) driving practices the minimise noise emissions on potentially affected residences.	62, Interview	The Code is considered acceptable but should be updated to include a specific reference to this condition	Compliant
	<b>HERITAGE</b>			
C55	The Applicant shall cease all works on site in the event that any Aboriginal cultural object(s) or human remains are uncovered onsite. The NSW Police, the Aboriginal Community and the OEH are to be notified. Works shall not resume in the designated area until consent in writing from the NSW Police and/or the OEH has been obtained.	17	The OEMP includes management of heritage items in accordance with this condition	Compliant
	<b>VISUAL AMENITY LIGHTING AND SIGNAGE</b>			
C56	All external lighting associated with the Development shall be mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadways. The lighting shall be the minimum level of illumination necessary and shall comply with Australian Standard AS4282 1997 - Control of the Obtrusive Effects of Outdoor Lighting	Site inspection	There are no sensitive residents near or adjacent to the premises. It was noted during the site inspection that lighting points inwards to the facility	Compliant
C57	The Applicant shall not install any advertising signs on site without the written consent of the Secretary.	Site inspection	Only signs observed on site related to the facility name and directional or safety related	Compliant
	<b>FLORA AND FAUNA</b>			
C58	The Applicant shall:			
	(a) avoid clearing the Swamp Oak Floodplain Forest EEC (with the exception of the 12 juvenile Swamp Oaks identified in the EIS) at the southern end of the site and ensure this stand is protected and maintained during construction and operation of the Development;	Site Inspection	The site perimeter is well defined and fenced. Allocasuarina species were observed just outside the perimeter fencing. Landscaping works include Allocasuarina species.	Compliant
	(b) implement suitable measures to manage and prevent the spread of notifiable weeds on site as defined in the Noxious Weeds Act 1993; and	Site interviews	There are weeds present within the internal landscaping area but no evidence that this has spread beyond the property boundary	Compliant
	(c) ensure landscaping along the eastern boundary of the site is maintained throughout the life of the Development.	Site inspection	Landscape bund photographed as part of this audit, photos shown in Appendix C	Compliant
	<b>SECURITY</b>			
C59	The Applicant shall:			
	(a) install and maintain a perimeter fence and security gates on the site; and	Site inspection	Fence noted and photographed as part of this audit	Compliant
	(b) ensure that the security gates on site are locked whenever the site is unattended.	Site inspection, interview	Gates are locked and security provided outside operating hours	Compliant


Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	<b>HAZARDS AND RISK</b>			
C60	The quantities of dangerous goods stored and handled at the site shall be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines - Applying SEPP 33 at all times.	Site inspection	The storage of dangerous goods was inspected and found to be satisfactory. Photographs are provided in Appendix C.	Compliant
	<b>SCHEDULE D ENVIRONMENTAL MANAGEMENT AND REPORTING</b>			
D1	<b>CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN</b>			
	The Applicant shall implement a Construction Environmental Management Plan during construction work for the Development. The Plan must:	5	Assessment of compliance of the CEMP against the construction program was subject to previous audits	
	(a) be prepared by a suitably qualified and experienced expert;	5	Previously assessed as compliant	Compliant
	(b) be submitted to and approved by the Secretary prior to the commencement of construction;	5	Previously assessed as Non-Compliant	Non-Compliant
	(c) details of erosion, sediment and pollution control measures and practices to be implemented during construction of the realigned haul road (as identified in Appendix. 1 );	5	Previously assessed as compliant	Compliant
	(d) describe all activities to be undertaken on the site during construction an outline all management practises and procedures;	5	Previously assessed as compliant	Compliant
	(e) identify the statutory approvals that apply to the development;	5	Previously assessed as compliant	Compliant
	(f) describe of the roles and responsibilities for all relevant employees involved in construction; and	5	Previously assessed as Non-Compliant	Non-Compliant
	(g) include arrangements for complaints handling procedures during construction.	5	Previously assessed as compliant	Compliant
	<b>OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN</b>			
D2	The Applicant shall implement an Operational Environmental Management Plan for the Development. This plan must:	17		
	(a) be prepared by a suitably qualified and experienced expert;	17		
	(b) be submitted to and approved by the Secretary prior to the commencement of the expanded operations;	63, 17	OEMP V8 (dated 7 May 2018) was lodged with DPE and approved. Version 9 was lodged with DPE in July 2023. Although acknowledged, approval has yet to be obtained. This audit recommends that Boral improves its communications with DPE.	Compliant
	(c) provide a strategic framework for environmental management of the Development;	17	Framework included	Compliant
	(d) identify the statutory approvals that apply to the Development;	17	Statutory approvals described	Compliant
	(e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;	17	Roles and responsibilities provided however these need to be updated as currently incorrect due to recent restructure	Compliant
	(f) detail the commissioning period, including surface water monitoring and the deployment of mitigation measures;	17	Water management provisions and mitigation measures described	Compliant
	(g) describe in general how the environmental performance of the Development would be monitored and managed;	17	Performance measures provided	Compliant
	(h) include the relevant plans listed in Schedule C;	17	Plans provided	Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	(i) include a process for ongoing review and update of the OEMP (including documenting any changes to the development, surface water management system and mitigation measures identified in the surface water mitigation and monitoring plan and any audits);	17	Process of review detailed however the plan as lodged needs to be updated, including monitoring requirements for groundwater and surface water treatment	Compliant
	(j) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; and (v) respond to emergencies.	17	Complaints procedures documented	Compliant
	<b>MANAGEMENT PLAN REQUIREMENTS</b>			
D3	The Applicant shall ensure that the environmental management plans required under this consent are prepared in accordance with any relevant guidelines and include:			
	(a) detailed baseline data;	Results of management plan review	All management plans reviewed contains the list of consent requirements including matters listed in D3	Compliant
	(b) a description of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures/criteria; (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures; (iv) the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	Results of management plan review	All management plans reviewed contains the list of consent requirements including matters listed in D3	Compliant
	(c) a program to monitor and report on the: (i) impacts and environmental performance of the Development; (ii) effectiveness of any management measures; (iii) a contingency plan to manage any unpredicted impacts and their consequences; (iv) a program to investigate and implement ways to improve the environmental performance of the Development over time;	Results of management plan review	All management plans reviewed contains the list of consent requirements including matters listed in D3	Compliant
	(d) a protocol for managing and reporting any: (i) incidents; (ii) complaints; (iii) non-compliances with statutory requirements; and (iv) exceedances of the impact assessment criteria and/or performance criteria; and (v) a protocol for periodic review of the plan.	Results of management plan review	All management plans reviewed contains the list of consent requirements including matters listed in D3	Compliant
	<b>MANAGEMENT PLAN REQUIREMENTS</b>			
D4	The Secretary may waive some of the requirements in Condition D3 if they are unnecessary or unwarranted for particular management plans	N/A	Noted, Boral has not requested any changes to requirements at this stage	Not Triggered
	<b>INCIDENT REPORTING</b>			

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
D5	The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the Development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident and such further reports as may be requested.	Results of this audit	Email from DPE dated 18/8/23 advising that a discharge incident which was reported to the EPA was not separately reported to DPE. This audit recommends Boral improve its communication with DPE.	Non-compliant
	<b>REGULAR REPORTING</b>			
D6	The Applicant shall provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	27, 28, 29	Annual reviews have been provided for the three years covered by this audit. The Widemere website contains monitoring data and Annual Reviews	Compliant
	<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>			
D7	Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:	4, 5 and this audit	Audit schedule has been achieved	Compliant
	(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;	4, 5 and this audit	Auditing program and content considered satisfactory	Compliant
	(b) led by a suitably qualified auditor, and include experts in fields specified by the Secretary;	4, 5 and this audit	Auditing program and content considered satisfactory	Compliant
	(c) include consultation with the relevant agencies;	4, 5 and this audit	Auditing program and content considered satisfactory	Compliant
	(d) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under these approvals);	4, 5 and this audit	Auditing program and content considered satisfactory	Compliant
	(e) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and	4, 5 and this audit	Auditing program and content considered satisfactory	Compliant
	(f) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.	4, 5 and this audit	Auditing program and content considered satisfactory	Compliant
D8	Within three months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report. Within one year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review must:	4, 5	Auditing program and content considered satisfactory	Compliant
	(a) describe the Development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year;	Results of this audit	Auditing program and content considered satisfactory	Compliant
	(b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of these results against the: (i) the relevant statutory requirements, limits or performance measures/criteria; (ii) requirements of any plan or program required under this consent; (iii) the monitoring results of previous years; and (iv) the relevant predictions in the EIS;	Results of this audit	Auditing program and content considered satisfactory	Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;	Results of this audit	Auditing program and content considered satisfactory	Compliant
	(d) identify any trends in the monitoring data over the life of the Development	Results of this audit	Auditing program and content considered satisfactory	Compliant
	(e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and	Results of this audit	Auditing program and content considered satisfactory	Compliant
	(f) describe what measures will be implemented over the next year to improve the environmental performance of the Development.	Results of this audit	Auditing program and content considered satisfactory	Compliant
D10	<b>REVISION OF STRATEGIES, PLANS, PROGRAMS</b>			
	Within three months of the submission of an:	Review of plans described in this audit	Evidence of revisions provided in each plan	Compliant
	(a) annual review under Condition D9 above;	Review of plans described in this audit	Evidence of revisions provided in each plan	Compliant
	(b) incident report under Condition D5 above;	Review of plans described in this audit	Evidence of revisions provided in each plan	Compliant
	(c) audit under Condition D7 above; or	Review of plans described in this audit	Evidence of revisions provided in each plan	Compliant
	(d) any modification to this consent, the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.	Review of plans described in this audit	Evidence of revisions provided in each plan. Modified plans have not been subject to review by DPE but these did not occur as a result of a consent modification	Compliant
D11	The Applicant shall ensure that the operation of the Development is undertaken in accordance with all relevant updated and/or amended strategies, management plans and programs approved by the Secretary (or as revised and approved by the Secretary), unless otherwise agreed by the Secretary.	Review of plans described in this audit	Evidence of revisions provided in each plan	Compliant
	<b>ACCESS TO INFORMATION</b>			
D12	The Applicant shall:			
	(a) make copies of the following publicly available on its website: (i) the documents referred to in Condition D2; (ii) all current statutory approvals for the Development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; (v) a complaints register, updated on a monthly basis; (vi) minutes of any community meetings held by the Applicant; (vii) the annual reviews of the Development; (viii) any independent environmental audit of the Development, and the Applicant's response to the recommendations in any audit; (ix) any other matter required by the Secretary; and	Review of documents held on the Widemere web site, part of the Boral stable of sites	Documents held on line at the time of this audit were: . Directions, facility description and hours of operation . materials accepted . Development consent, modification, and EIS studies . Monitoring data required by the EPL . OEMP but not the latest version (2018) . Complaint procedures and community details . Annual Reviews from 2016 to 2022 . Audits since 2017 . Response to audits since 2017	Compliant
	(b) keep this information up to date and to the satisfaction of the Secretary.	Review of documents held on the Widemere web site, part of the Boral stable of sites	The OEMP is outdated as a 2021 version has been produced and provided to DPE. This audit recommends that that 2021 OEMP be updated prior to lodging on line	Compliant

**Table A2 – EPL 11815**

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status									
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. 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 border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <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> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Resource recovery	Recovery of general waste	Any general waste recovered	Waste storage	Waste storage - other types of waste	Any other types of waste stored	Site inspection and interviews	Material limits not exceeded	Compliant
Scheduled Activity	Fee Based Activity	Scale											
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 located at 38 Widemere Road, Wetherill Park 2164		Noted correct	Compliant									
A2.2	<p>The premises are located on the map below</p> 	Site inspection and interviews	Map is correct	Compliant									
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>	Site inspection and interviews	Development as constructed complies with original approval	Compliant									
<b>2</b>	<b>Discharges to Air and Water and Applications to Land</b>												

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status												
P1.1	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table border="1"> <thead> <tr> <th>EPA identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ambient air monitoring</td> <td></td> <td>Dust gauge labelled "Ambient Air Monitoring" on map titled "Boral Recycling Plant EPL 11815 Licensed Monitoring Points" dated 11 June 2010</td> </tr> </tbody> </table>	EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Ambient air monitoring		Dust gauge labelled "Ambient Air Monitoring" on map titled "Boral Recycling Plant EPL 11815 Licensed Monitoring Points" dated 11 June 2010	Site inspection and interviews	Dust gauges correctly located, but there are two onsite	Compliant				
EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description													
1	Ambient air monitoring		Dust gauge labelled "Ambient Air Monitoring" on map titled "Boral Recycling Plant EPL 11815 Licensed Monitoring Points" dated 11 June 2010													
P1.2	<p>The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.</p> <table border="1"> <thead> <tr> <th>EPA Identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>Discharge to Waters Discharge Quality Monitoring Volume Monitoring</td> <td>Discharge to Waters Discharge Quality Monitoring Volume Monitoring</td> <td>Discharge outlet labelled "Stormwater Discharge Point" on map titled "Boral Recycling Plant EPL 11815 Licensed Monitoring Points" dated 11 June 2010</td> </tr> </tbody> </table>	EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	2	Discharge to Waters Discharge Quality Monitoring Volume Monitoring	Discharge to Waters Discharge Quality Monitoring Volume Monitoring	Discharge outlet labelled "Stormwater Discharge Point" on map titled "Boral Recycling Plant EPL 11815 Licensed Monitoring Points" dated 11 June 2010	Site inspection and interviews		Compliant				
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description													
2	Discharge to Waters Discharge Quality Monitoring Volume Monitoring	Discharge to Waters Discharge Quality Monitoring Volume Monitoring	Discharge outlet labelled "Stormwater Discharge Point" on map titled "Boral Recycling Plant EPL 11815 Licensed Monitoring Points" dated 11 June 2010													
P1.3	<p>The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.</p> <table border="1"> <thead> <tr> <th>EPA identification no.</th> <th>Type of monitoring point</th> <th>Location description</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>Noise monitoring</td> <td>Munro Street Greystanes</td> </tr> <tr> <td>4</td> <td>Noise monitoring</td> <td>Southern Greystanes Estate Residential Lands</td> </tr> <tr> <td>5</td> <td>Noise monitoring</td> <td>Daruga Avenue, Nelsons Ridge</td> </tr> </tbody> </table>	EPA identification no.	Type of monitoring point	Location description	3	Noise monitoring	Munro Street Greystanes	4	Noise monitoring	Southern Greystanes Estate Residential Lands	5	Noise monitoring	Daruga Avenue, Nelsons Ridge	Site inspection and interviews	Annual Noise monitoring occurs and the November 2023 monitoring program reviewed and found acceptable	Compliant
EPA identification no.	Type of monitoring point	Location description														
3	Noise monitoring	Munro Street Greystanes														
4	Noise monitoring	Southern Greystanes Estate Residential Lands														
5	Noise monitoring	Daruga Avenue, Nelsons Ridge														
3	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.	Site inspection and interviews, data review	Assessment of auditor	Compliant												
L1.2	<p>Managed overflow from Point 2 is permitted when the discharge occurs solely as a result of rainfall at the premises exceeding a total of 120 millimetres over any consecutive five day period or due to extended periods of significant rainfall that lead to managed overflows of the basin. Controlled point source discharge is permitted when the discharge occurs in order to regain dam capacity within the 5 days of rainfall event. Note: A controlled point source discharge is a discharge where the:</p> <ul style="list-style-type: none"> <li>• discharge point location can be specifically identified and clearly defined;</li> <li>• licensee has control over the frequency, volume and pollutant concentrations of the discharge; and</li> <li>• EPA can reasonably expect that with proper and efficient management practices the licensee can comply with volume and pollutant concentration limits at all times.</li> </ul>	Site inspection and interviews, data review	There has been two reported overflows, the second of which resulted in negotiations of the current EPL conditions. This condition used to be a total of 45 mm but now 120 mm of rainfall	Compliant												
L2	Concentration Limits															

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status																														
L2.1	For each monitoring/discharge point or utilisation area specified in the tables below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Interviews	There has been no overflows or discharges since this licence version	Not triggered																														
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Interviews	There has been no overflows or discharges since this licence version	Not triggered																														
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table's.	Interviews	There has been no overflows or discharges since this licence version	Not triggered																														
L2.4	<p>Water and/or Land Concentration Limits POINT 2</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>50 percentile concentration limit</th> <th>90 percentile concentration limit</th> <th>3DGM concentration limit</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>Oil and Grease</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>10</td> </tr> <tr> <td>pH</td> <td>pH</td> <td></td> <td></td> <td></td> <td>6.5-8.5</td> </tr> <tr> <td>Total suspended solids</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>50</td> </tr> <tr> <td>Turbidity</td> <td>nephelometric turbidity units</td> <td></td> <td></td> <td></td> <td>150</td> </tr> </tbody> </table>	Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	Oil and Grease	milligrams per litre				10	pH	pH				6.5-8.5	Total suspended solids	milligrams per litre				50	Turbidity	nephelometric turbidity units				150	Site inspection and interviews	There has been no overflows or discharges since this licence version	Not triggered
Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit																													
Oil and Grease	milligrams per litre				10																													
pH	pH				6.5-8.5																													
Total suspended solids	milligrams per litre				50																													
Turbidity	nephelometric turbidity units				150																													
L3	Waste																																	



L3.1	<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>	27, 28, 29, 64, 65	<p>Annual Reviews for the past 3 years have specified the volumes of waste and waste types delivered to site. These volumes have been checked and comply with limits where specified.</p> <p>Waste classification testing undertaken by Boral laboratories</p>	Compliant																																																												
<table border="1"> <thead> <tr> <th data-bbox="318 357 398 379">Code</th> <th data-bbox="421 357 654 379">Waste</th> <th data-bbox="676 357 891 379">Description</th> <th data-bbox="913 357 1093 379">Activity</th> <th data-bbox="1137 357 1308 379">Other Limits</th> </tr> </thead> <tbody> <tr> <td data-bbox="318 389 398 411">NA</td> <td data-bbox="421 389 654 443">Building and demolition waste</td> <td data-bbox="676 389 891 491">As defined in Boral engineered glass sand resource recovery exemption 2020</td> <td data-bbox="913 389 1093 443">Resource recovery Waste storage</td> <td data-bbox="1137 389 1308 411"></td> </tr> <tr> <td data-bbox="318 491 398 513">NA</td> <td data-bbox="421 491 654 513">Building and demolition waste</td> <td data-bbox="676 491 891 593">As defined in Boral engineered glass sand resource recovery order 2020</td> <td data-bbox="913 491 1093 545">Resource recovery Waste storage</td> <td data-bbox="1137 491 1308 513"></td> </tr> <tr> <td data-bbox="318 593 398 616">NA</td> <td data-bbox="421 593 654 667">Waste concrete slurry from the company's concrete batching plants</td> <td data-bbox="676 593 891 647">Wet concrete batching plant stirrer waste</td> <td data-bbox="913 593 1093 647">Resource recovery Waste storage</td> <td data-bbox="1137 593 1308 616">NA</td> </tr> <tr> <td data-bbox="318 667 398 689">NA</td> <td data-bbox="421 667 654 721">Concrete, bricks and roof tiles</td> <td data-bbox="676 667 891 769">Tiles and masonry, including seconds materials direct from manufacturer</td> <td data-bbox="913 667 1093 721">Resource recovery Waste storage</td> <td data-bbox="1137 667 1308 689">NA</td> </tr> <tr> <td data-bbox="318 769 398 791">NA</td> <td data-bbox="421 769 654 791">Excavated natural material</td> <td data-bbox="676 769 891 791"></td> <td data-bbox="913 769 1093 823">Resource recovery Waste storage</td> <td data-bbox="1137 769 1308 791">NA</td> </tr> <tr> <td data-bbox="318 823 398 845">NA</td> <td data-bbox="421 823 654 845">Building and demolition waste</td> <td data-bbox="676 823 891 896">As defined in Schedule 1 of the POEO Act, in force from time to time.</td> <td data-bbox="913 823 1093 877">Resource recovery Waste storage</td> <td data-bbox="1137 823 1308 845">NA</td> </tr> <tr> <td data-bbox="318 896 398 919">NA</td> <td data-bbox="421 896 654 999">Asphalt waste (including asphalt resulting from road construction and waterproofing works)</td> <td data-bbox="676 896 891 919"></td> <td data-bbox="913 896 1093 951">Resource recovery Waste storage</td> <td data-bbox="1137 896 1308 919">NA</td> </tr> <tr> <td data-bbox="318 999 398 1021">NA</td> <td data-bbox="421 999 654 1037">Virgin excavated natural material</td> <td data-bbox="676 999 891 1072">As defined in Schedule 1 of the POEO Act, in force from time to time.</td> <td data-bbox="913 999 1093 1053">Resource recovery Waste storage</td> <td data-bbox="1137 999 1308 1021">NA</td> </tr> <tr> <td data-bbox="318 1072 398 1094">NA</td> <td data-bbox="421 1072 654 1126">Plasterboard and ceramics</td> <td data-bbox="676 1072 891 1094"></td> <td data-bbox="913 1072 1093 1126">Resource recovery Waste storage</td> <td data-bbox="1137 1072 1308 1094">NA</td> </tr> <tr> <td data-bbox="318 1126 398 1149">NA</td> <td data-bbox="421 1126 654 1181">Cured concrete waste from a batch plant</td> <td data-bbox="676 1126 891 1149"></td> <td data-bbox="913 1126 1093 1181">Resource recovery Waste storage</td> <td data-bbox="1137 1126 1308 1149">NA</td> </tr> <tr> <td data-bbox="318 1181 398 1203">NA</td> <td data-bbox="421 1181 654 1203">Soils</td> <td data-bbox="676 1181 891 1254">Soils that meet the CT1 thresholds of General Solid Waste in Table 1</td> <td data-bbox="913 1181 1093 1235">Resource recovery Waste storage</td> <td data-bbox="1137 1181 1308 1254">Arsenic 40mg/kg; Cadmium 2mg/kg; Copper</td> </tr> </tbody> </table>					Code	Waste	Description	Activity	Other Limits	NA	Building and demolition waste	As defined in Boral engineered glass sand resource recovery exemption 2020	Resource recovery Waste storage		NA	Building and demolition waste	As defined in Boral engineered glass sand resource recovery order 2020	Resource recovery Waste storage		NA	Waste concrete slurry from the company's concrete batching plants	Wet concrete batching plant stirrer waste	Resource recovery Waste storage	NA	NA	Concrete, bricks and roof tiles	Tiles and masonry, including seconds materials direct from manufacturer	Resource recovery Waste storage	NA	NA	Excavated natural material		Resource recovery Waste storage	NA	NA	Building and demolition waste	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	NA	NA	Asphalt waste (including asphalt resulting from road construction and waterproofing works)		Resource recovery Waste storage	NA	NA	Virgin excavated natural material	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	NA	NA	Plasterboard and ceramics		Resource recovery Waste storage	NA	NA	Cured concrete waste from a batch plant		Resource recovery Waste storage	NA	NA	Soils	Soils that meet the CT1 thresholds of General Solid Waste in Table 1	Resource recovery Waste storage	Arsenic 40mg/kg; Cadmium 2mg/kg; Copper
Code	Waste	Description	Activity	Other Limits																																																												
NA	Building and demolition waste	As defined in Boral engineered glass sand resource recovery exemption 2020	Resource recovery Waste storage																																																													
NA	Building and demolition waste	As defined in Boral engineered glass sand resource recovery order 2020	Resource recovery Waste storage																																																													
NA	Waste concrete slurry from the company's concrete batching plants	Wet concrete batching plant stirrer waste	Resource recovery Waste storage	NA																																																												
NA	Concrete, bricks and roof tiles	Tiles and masonry, including seconds materials direct from manufacturer	Resource recovery Waste storage	NA																																																												
NA	Excavated natural material		Resource recovery Waste storage	NA																																																												
NA	Building and demolition waste	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	NA																																																												
NA	Asphalt waste (including asphalt resulting from road construction and waterproofing works)		Resource recovery Waste storage	NA																																																												
NA	Virgin excavated natural material	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	NA																																																												
NA	Plasterboard and ceramics		Resource recovery Waste storage	NA																																																												
NA	Cured concrete waste from a batch plant		Resource recovery Waste storage	NA																																																												
NA	Soils	Soils that meet the CT1 thresholds of General Solid Waste in Table 1	Resource recovery Waste storage	Arsenic 40mg/kg; Cadmium 2mg/kg; Copper																																																												

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	<p>of the Waste Classification Guidelines as in force from time to time with the exception of the maximum threshold values for contaminants specified in the "Other Limits" column</p> <p>NA Garden waste As defined in Schedule 1 of the POEO Act, in force from time to time. Resource recovery Waste storage</p>			
L3.2	The authorised amount of waste permitted on the premises cannot exceed 750,000 tonnes at any one time, unless approved in writing by the EPA.	Site Interview	Minimal material contained on site at anyone time	Compliant
L3.3	The Licensee must not receive on the Premises, more than 1,000,000 tonnes of waste per year.	27 (Table 8) 28 (Table 7) 29 (Table 6)	795,340 t material received in 2023 (up to audit period) 778,653 t material received in 2022 818,062 t material received in 2021 597,697 t material received in 2020	Compliant
L3.4	The height of any stockpile of any material on the Premises, must not exceed twenty (20) metres above ground level.	Site inspection	Noted on site as less than 20 m	Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
L35	The licensee must have in place and implement procedures to identify and prevent the acceptance of any waste not permitted by condition L4.1 at the premises.	Site inspection	Procedures noted on site	Compliant
L3.6	No asbestos waste is to be accepted or stored at the premises.	Site inspection	Training provided to identify asbestos materials	Compliant

L4	<p>Noise Limits Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2.</p> <p><b>POINT 3</b></p> <table border="1" data-bbox="383 300 1357 528"> <thead> <tr> <th>Time period</th> <th>Measurement parameter</th> <th>Measurement frequency</th> <th>Noise level dB(A)</th> </tr> </thead> <tbody> <tr> <td>Day</td> <td>Day-LAeq (15 minute)</td> <td>n/a</td> <td>39</td> </tr> <tr> <td>Evening</td> <td>Evening-LAeq (15 minute)</td> <td>n/a</td> <td>38</td> </tr> <tr> <td>Morning-Shoulder</td> <td>Morning Shoulder-LAeq(15 minute) (6am-7am Mon. -Sat. &amp; 6am-8am Sun &amp; Public Holidays)</td> <td>n/a</td> <td>39</td> </tr> </tbody> </table> <p><b>POINT 3,4,5</b></p> <table border="1" data-bbox="383 584 1370 724"> <thead> <tr> <th>Time period</th> <th>Measurement parameter</th> <th>Measurement frequency</th> <th>Noise level dB(A)</th> </tr> </thead> <tbody> <tr> <td>Night</td> <td>Night-LAeq (15 minute)</td> <td>n/a</td> <td>35</td> </tr> <tr> <td>Night</td> <td>LAFmax</td> <td>n/a</td> <td>50</td> </tr> </tbody> </table> <p><b>POINT 4</b></p> <table border="1" data-bbox="320 783 1377 1034"> <thead> <tr> <th>Time period</th> <th>Measurement parameter</th> <th>Measurement frequency</th> <th>Noise level dB(A)</th> </tr> </thead> <tbody> <tr> <td>Day</td> <td>Day-LAeq (15 minute)</td> <td>n/a</td> <td>39</td> </tr> <tr> <td>Evening</td> <td>Evening-LAeq (15 minute)</td> <td>n/a</td> <td>37</td> </tr> <tr> <td>Morning-Shoulder</td> <td>Morning Shoulder-LAeq(15 minute) (6am-7am Mon. -Sat. &amp; 6am-8am Sun &amp; Public Holidays)</td> <td>n/a</td> <td>39</td> </tr> </tbody> </table> <p><b>POINT 5</b></p> <table border="1" data-bbox="383 1090 1402 1326"> <thead> <tr> <th>Time period</th> <th>Measurement parameter</th> <th>Measurement frequency</th> <th>Noise level dB(A)</th> </tr> </thead> <tbody> <tr> <td>Day</td> <td>Day-LAeq (15 minute)</td> <td>n/a</td> <td>35</td> </tr> <tr> <td>Evening</td> <td>Evening-LAeq (15 minute)</td> <td>n/a</td> <td>35</td> </tr> <tr> <td>Morning-Shoulder</td> <td>Morning Shoulder-LAeq(15 minute) (6am-7am Mon. -Sat. &amp; 6am-8am Sun &amp; Public Holidays)</td> <td>n/a</td> <td>35</td> </tr> </tbody> </table>	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Day	Day-LAeq (15 minute)	n/a	39	Evening	Evening-LAeq (15 minute)	n/a	38	Morning-Shoulder	Morning Shoulder-LAeq(15 minute) (6am-7am Mon. -Sat. & 6am-8am Sun & Public Holidays)	n/a	39	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Night	Night-LAeq (15 minute)	n/a	35	Night	LAFmax	n/a	50	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Day	Day-LAeq (15 minute)	n/a	39	Evening	Evening-LAeq (15 minute)	n/a	37	Morning-Shoulder	Morning Shoulder-LAeq(15 minute) (6am-7am Mon. -Sat. & 6am-8am Sun & Public Holidays)	n/a	39	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Day	Day-LAeq (15 minute)	n/a	35	Evening	Evening-LAeq (15 minute)	n/a	35	Morning-Shoulder	Morning Shoulder-LAeq(15 minute) (6am-7am Mon. -Sat. & 6am-8am Sun & Public Holidays)	n/a	35	Site inspection and interviews, data review	Noise monitoring results show operation is inaudible at nearest residential receptor	Compliant
Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																																																													
Day	Day-LAeq (15 minute)	n/a	39																																																													
Evening	Evening-LAeq (15 minute)	n/a	38																																																													
Morning-Shoulder	Morning Shoulder-LAeq(15 minute) (6am-7am Mon. -Sat. & 6am-8am Sun & Public Holidays)	n/a	39																																																													
Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																																																													
Night	Night-LAeq (15 minute)	n/a	35																																																													
Night	LAFmax	n/a	50																																																													
Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																																																													
Day	Day-LAeq (15 minute)	n/a	39																																																													
Evening	Evening-LAeq (15 minute)	n/a	37																																																													
Morning-Shoulder	Morning Shoulder-LAeq(15 minute) (6am-7am Mon. -Sat. & 6am-8am Sun & Public Holidays)	n/a	39																																																													
Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																																																													
Day	Day-LAeq (15 minute)	n/a	35																																																													
Evening	Evening-LAeq (15 minute)	n/a	35																																																													
Morning-Shoulder	Morning Shoulder-LAeq(15 minute) (6am-7am Mon. -Sat. & 6am-8am Sun & Public Holidays)	n/a	35																																																													
L4.2	For the purposes of Condition 4.1: a) Day is defined as the period from 7am to 6pm;	Noted	Noted in OEMP and NMP	Compliant																																																												

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
	b) Evening is defined as the period from 6pm to 10pm; c) Night is defined as the period from 10pm to 12am; and d) Morning shoulder period is a subset of the night period between 6am to 7am.			
L4.3	The noise limits set out in condition L4.1 apply under all meteorological conditions except for the following: a) Wind speeds greater than 3 metres/second at 10 metres above ground level. b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or c) Stability category G temperature inversion conditions.	Site inspection and interviews, data review	Noise monitoring results show operation is inaudible at nearest residential receptor	Compliant
L4.4	For the purposes of condition L4.4: a) Data recorded by a meteorological station installed on site must be used to determine meteorological conditions; and b) Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part E4 of Appendix E to the NSW Industrial Noise Policy.	Site inspection and interviews, data review	Noise monitoring results show operation is inaudible at nearest residential receptor	Compliant
L4.5	To determine compliance: a) with the Leq(15 minute) noise limits in condition L4.1, the noise measurement equipment must be located: • approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or • within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable • within approximately 50 metres of the boundary of a National Park or a Nature Reserve. b) with the LA1(1 minute) noise limits in condition L4.1, the noise measurement equipment must be located within 1 metre of a dwelling façade. c) with the noise limits in condition L4.1, the noise measurement equipment must be located: • at the most affected point at a location where there is no dwelling at the location; or • at the most affected point within an area at a location prescribed by conditions L4.5(a) or L4.5(b).	Site inspection and interviews, data review	Noise monitoring results show operation is inaudible at nearest residential receptor	Compliant
L4.6	A non-compliance of condition L4.1 will still occur where noise generated from the premises in excess of the appropriate limit is measured: • at a location other than an area prescribed by conditions L4.5(a) and L4.5(b); and/or • at a point other than the most affected point at a location.	Site inspection and interviews, data review	Noise monitoring results show operation is inaudible at nearest residential receptor	Compliant
L4.7	For the purposes of determining the noise generated at the premises the NSW Noise Policy for Industry (2017) must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.	36	Noise monitoring results show operation is inaudible at nearest residential receptor	Compliant
L4.8	The licensee must ensure that all activities are to be undertaken in a manner that will minimise noise and vibration impacts on sensitive receivers.	36	Noise monitoring results show operation is inaudible at nearest residential receptor	Compliant
<b>L5</b>	<b>Hours of Operation</b>			
L5.1	All construction work at the premises must only be conducted between 7am and 6pm Monday to Friday inclusive, and between 8:00am and 1:00pm on Saturdays. No construction activity is permitted on a Sunday or a Public Holiday.	Site inspection and interviews, data review		Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
L5.2	Subject to compliance with noise limits in Condition 4.1, operational activities associated with Premises shall only be carried out between the following hours: a) 6:00am and midnight, Monday to Saturday inclusive; b) 6:00am and 6:00pm on one Sunday per month; and c) at no time on public holidays.	17	Observed correct	Compliant
L5.3	Notwithstanding Condition 5.2, but subject to compliance with the noise limits in Condition 5.1, ancillary activities on the Premises may be carried out between the following hours: a) 6:00am to midnight Monday to Saturday, inclusive; b) 6:00am and 6:00pm on Sundays; and c) at no time on public holidays. Note: Ancillary Activities means any servicing and/or maintenance of the equipment/machinery associated with the operations, loading and unloading of material onto/from vehicles and stockpiles and the selling of recycled product.	17	Observed correct	Compliant
L5.4	The Licensee must keep a record of all works undertaken on a Sunday.	17	Observed correct	Compliant
L7	Potentially offensive Odour			
L7.1	No condition of this licence identifies a potentially offensive odour for the purpose of Section 129 of the Protection of the Environment Operations Act 1997. Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with conditions of licence directed at minimising odour.	Site inspection	No odour observed on site during site inspection	Compliant
L7.2	Any odour generating material is to be removed from the premises within 24 hours of being received.	Site inspection	No odour observed on site during site inspection	Compliant
<b>4</b>	<b>Operating Conditions</b>			
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.	Site inspection and interviews, data review	Observations made on site and documented in table A3	Compliant
O2	Maintenance of Plant and Equipment	Site inspection and interviews, data review	Observations made on site and documented in table A3	Compliant
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.	Site inspection and interviews, data review	Observations made on site and documented in table A3	Compliant
O3	Dust			

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
O3.1	All activities conducted on the premises must be undertaken by such practical means to avoid or minimise the generation and emission of air pollutants, including dust.	Site inspection and interviews, data review	Dust cannot be totally avoided, however dust controls limit generation of dust	Compliant
O3.2	The premises must be maintained in a condition which prevents or minimises the emission of air pollutants, including dust, from the premises.	Site inspection and interviews, data review	The site has adequate dust controls and is generally kept clean by regular use of water truck and sweeper	Compliant
O3.3	Entries, exits and car parks must be maintained in a good condition with a sealed hardstand road.	Site inspection and interviews, data review	There was no evidence of dust generation during the audit inspection	Compliant
O3.4	The licensee must ensure that no material, including sediment or oil, is tracked from the premises.	inspection and interviews, data review	Roadways inspected during audit and found no evidence of sediment tracking off site	Compliant
O3.5	An appropriate wheel wash facility must be installed, maintained and operated during the operational hours on each exit of the premises. Wheel wash infrastructure must always be maintained in a fully operational manner.	inspection and interviews, data review	The wheel wash was inspected and found to be operating effectively	Compliant
O3.6	Appropriate measures must be put in place to ensure that all vehicular traffic associated with any operations at the premises must pass through the wheel wash when leaving the premises, except, in circumstances where the vehicle exiting the premises is: - a motor car (being a motor vehicle constructed primarily for the carriage of persons or that is of the kind known as a utility, station wagon or panel van) or motor car trailer; and - not transporting waste to or from the premises.	inspection and interviews, data review	Roadways inspected during audit and found no evidence of sediment tracking off site	Compliant
O3.7	Vehicle routes in use on the premises are to be frequently wetted to prevent or minimise dust during hours of operation.	inspection and interviews, data review	Water cart present and used regularly	Compliant
O3.8	Trucks entering and leaving the premises that are carrying loads must be covered at all times except during loading and unloading.	Inspection	Observations made onsite	Compliant
O3.9	Dust sprays and/or dust suppression systems must be installed and operated on crushing, grinding and screening equipment associated with dust generation at the premises during hours of operation.	Inspection	Dust suppression sprays present as required	Compliant
O3.10	The licensee must immediately cease dust generating activities under dry, windy conditions to prevent dust leaving the premises.	Inspection	Observations made on site and documented in table A3	Compliant
O4	Effluent application to land	Inspection	Observations made on site and documented in table A3	Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
O4.1	Waste water must only be applied to the area within the boundary of the premises.	Inspection	Observations made on site and documented in table A3	Compliant
O4.2	Spray from wastewater application must not drift beyond the boundary of the wastewater utilisation area which it is applied	Inspection	Observations made on site and documented in table A3	Compliant
O5	Emergency response			
O5.1	The licensee must prepare, maintain and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. NOTE: The licensee must develop their PIRMP in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations Act 1997 (the POEO Act) and the POEO Regulations.		The PIRMP was found to be compliant and available on Borals web site	Compliant
O6	Processes and management			
O6.1	The licensee must take all practical steps to control entry to the premises.		The site is gated and locked when not operating	Compliant
O7	Waste Management			
O7.1	The Licensee must install, maintain and operate at all times a calibrated weighbridge to record the volume of all waste brought into the premises.	observation	Weighbridge present	Compliant
O7.2	The licensee must ensure that all waste stored or processed at the premises is assessed and classified in accordance with the EPA Waste Classification Guidelines and any applicable Resource Recovery Orders and Exemptions as in force from at the time	Data review	Monitoring results observed	Compliant
O7.3	Each type of waste stored on site for recovery/recycling must be stockpiled separately.	observation	Observed	Compliant
O7.4	The Licensee must install and maintain permanent stockpile height markers in any areas where waste is stockpiled at the Premises.	Observation and procedural	Observed	Compliant
O8	Other Operating Conditions			
O8.1	The licensee maintain a surface water retention system, including water detention basins, and water storage tanks with a minimum capacity to contain 120 millimetres of rainfall over any consecutive 5 day period.	Site inspection	This was noted on site and in the SWMP	Compliant
O8.2	The licensee must ensure that a visible marker is installed in each sediment retention basin in a position that shows the freeboard in the basin that equates to the volume required to contain all rainfall and runoff in the catchment from a 120 millimetre rainfall event over any consecutive 5 day period.	Site inspection	Observed	Compliant
O8.3	The Licensee must ensure that all surface water runoff is collected on site and drains to a storage pond/dam.	Site inspection	Observed	Compliant
O8.4	All erosion and sediment controls must be installed and maintained on the premises. The controls must be inspected regularly and after each rain event and repaired if required.	Site inspection, data reviewed	Observed	Compliant
O8.5	All catchment/sediment, waste and stormwater dams/storage must be designed, maintained and operated with adequate capacity to store surface water collected on site as per the specifications outlined in Managing Urban Stormwater: Soils and construction - Volume 1.	Site inspection	Observed	Compliant
<b>5</b>	<b>Monitoring and Recording Conditions</b>			
	Monitoring Records			
M1	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.	Data review	Observed	Compliant



Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status																				
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.	Site inspection and interview	Observed as being digital	Compliant																				
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.	Interviews	COC forms and results observed	Compliant																				
M2	Requirement to monitor concentration of pollutants discharged																							
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Data review	Observed in digital format	Compliant																				
M2.2	Air Monitoring Requirements <b>POINT 1</b> <table border="1" data-bbox="383 667 1384 767"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Particulates - Deposited Matter</td> <td>grams per square metre per month</td> <td>Continuous</td> <td>AM-10</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	Particulates - Deposited Matter	grams per square metre per month	Continuous	AM-10	Monitoring data review	Observed in digital format	Compliant												
Pollutant	Units of measure	Frequency	Sampling Method																					
Particulates - Deposited Matter	grams per square metre per month	Continuous	AM-10																					
M2.3	Water and/or Land Monitoring Requirements <b>POINT 2</b> <table border="1" data-bbox="376 847 1384 1102"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Oil and Grease</td> <td>milligrams per litre</td> <td>Daily during any discharge</td> <td>Grab sample</td> </tr> <tr> <td>pH</td> <td>pH</td> <td>Daily during any discharge</td> <td>Probe</td> </tr> <tr> <td>Total suspended solids</td> <td>milligrams per litre</td> <td>Daily during any discharge</td> <td>Grab sample</td> </tr> <tr> <td>Turbidity</td> <td>nephelometric turbidity units</td> <td>Daily during any discharge</td> <td>Probe</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	Oil and Grease	milligrams per litre	Daily during any discharge	Grab sample	pH	pH	Daily during any discharge	Probe	Total suspended solids	milligrams per litre	Daily during any discharge	Grab sample	Turbidity	nephelometric turbidity units	Daily during any discharge	Probe	Monitoring data review	Observed in digital format	Compliant
Pollutant	Units of measure	Frequency	Sampling Method																					
Oil and Grease	milligrams per litre	Daily during any discharge	Grab sample																					
pH	pH	Daily during any discharge	Probe																					
Total suspended solids	milligrams per litre	Daily during any discharge	Grab sample																					
Turbidity	nephelometric turbidity units	Daily during any discharge	Probe																					
M3	Testing Methods – concentration limits																							
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	Monitoring data review	Testing is undertaken by the NATA registered internally owned laboratory. Testing methods conform to approved EPA methodology	Compliant																				

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
M3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted. Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".	Monitoring data review	Testing is undertaken by the NATA registered internally owned laboratory. Testing methods conform to approved EPA methodology	Compliant
M4	<b>Recording of Pollution Complaints</b>			
M4.1	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.	Data Inspection	Complaints register is kept and provided on website	Compliant
M4.2	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.	Data Inspection	Complaints register inspected	Compliant
M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Data Inspection	In digital format	Compliant
M4.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Noted	Noted	Not triggered
M5	<b>Telephone Complaints Line</b>			
M5.1	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.	Website		Compliant
M5.2	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.	Website		Compliant
M5.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.		Provisions currently in place and previously noted as compliant in first audit report	Compliant
M6	<b>Other monitoring and recording conditions</b>			
M6.1	The licensee must keep a record of each load of Soil, as referred to under Condition L3.1, that is received at the premises. The record must include, but not necessarily be limited to, the following: a) a copy of the waste classification report in accordance with the Waste Classification Guidelines, including the classification and the limits specified in the L3.1 table; b) the quantity (in tonnes) of the Soil received; c) the date and time that the Soil were received; d) the registration number of the vehicle transporting the Soil to the premises; e) the source(s) and address where the Soil was received from; and f) the name and contact details of the company or individual delivering the Soil to the premises. The record must be retained at the premises for at least 4 years after the receipt of the load of the soil. The record must be produced to any authorised officer of the EPA upon request.	Data Inspection	Contained in digital format	Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
6	Reporting Conditions			
R1	Annual Return Documents	Noted		
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 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. 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.	Data review	Noted as being lodged on EPA website	Compliant
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.			
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.	N/A		Not triggered
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.	N/A		Not triggered
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA 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').		Returns are now undertaken on line	Compliant
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.		In digital format	Compliant
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. 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. Note: An application to transfer a licence must be made in the approved form for this purpose.		In digital format	Compliant
R2	Notification of Environmental Harm	27, 28, 29, 51, 52, 56,	Correspondence and record of Pollution Line call sighted	Compliant
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.		Correspondence and record of Pollution Line call sighted	Compliant
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. 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.	27, 28, 29, 51, 52, 56	Records sighted for event prior to current licence date	Compliant
R3	Written Report	57, 58	Records sighted	Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
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.	57, 58	Records sighted	Compliant
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.	57, 58	Records sighted	Compliant
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.	57, 58	Records sighted	Compliant
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.	57, 58	Records sighted	Compliant
<b>7</b>	<b>General Conditions</b>			
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	Site inspection	Noted copy on site	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Noted	Noted as being available on previous EPA inspections	Compliant
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Noted	Copy available to all employees and forms part of staff training	Compliant
<b>8</b>	<b>Pollution Studies and Reduction Programs</b>			
U1	Water Pollution Management Validation of implemented mitigation measures	N/A	This is a recent PRP which Boral has negotiated and is due to be fulfilled in	Not triggered
U1.1	To ascertain the ongoing effectiveness of the implemented mitigation measures to minimise water pollution during discharge events, the Licensee must undertake monitoring during any discharge events up to 30 June 2024.	N/A	Work is underway but not subject to completion	Not triggered
U1.2	The Licensee must record all overflow events, including the duration of the event, estimated volume of the overflow and associated daily rainfall.	N/A	No overflows since PRP placed on EPL	Not triggered
U1.3	The discharge from Dam 2 must be sampled daily during overflow events.	N/A		Not triggered

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
U1.4	Samples must be analysed in a NATA or equivalently accredited laboratory for; <ul style="list-style-type: none"> <li>• Chromium (VI) (ug/L)</li> <li>• Aluminium (ug/L)</li> <li>• Copper (ug/L)</li> </ul>	N/A	No overflows since PRP placed on EPL	Not triggered
U1.5	The Licensee must report the results of the monitoring to the EPA by 31 August 2024.	N/A		Not triggered
U1.6	Where the results indicate a potential impact, the EPA may require the Licensee to undertake further assessment, such as ecotoxicology testing of the discharge.	N/A		Not triggered
<b>9</b>	<b>Special Conditions</b>			
E1	Air Quality			
E1.1	Prior to increasing processing up to 1,000,000 tonnes the Licensee must prepare and implement an Air Quality Management Plan (AQMP). The AQMP must include: <ul style="list-style-type: none"> <li>(a) Proactive and reactive management strategies.</li> <li>(b) For all pollutant emission sources, as minimum: <ul style="list-style-type: none"> <li>• key performance indicator(s) for emission controls;</li> <li>• monitoring method(s) including location, frequency and duration;</li> <li>• response mechanisms;</li> <li>• responsibilities;</li> <li>• record keeping; and</li> <li>• compliance reporting.</li> </ul> </li> </ul>	14, 17, 26	Documents sighted	Compliant
	Best Practice Management Review for Particle Emissions			
E1.2	By no later than 26 May 2017, the Licensee must undertake a site audit, completed by a suitably qualified third party, to identify all fugitive particulate matter emission sources, and benchmark the mitigation measures against best practice. The objective of the audit is to: <ul style="list-style-type: none"> <li>(a) identify fugitive particulate matter emission sources, and rank sources in order of emission potential;</li> <li>(b) identify and implement proactive and reactive management strategies for each identified particulate matter emission source, for inclusion in the Air Quality Management Plan;</li> <li>(c) identify the mitigation measures currently applied to each identified emission source;</li> <li>(d) benchmark the current mitigation measures against best practice performance indicators;</li> <li>(e) where current mitigation measures are not consistent with best practice, the identification of remedial or upgrade works to mitigate the emission source in line with best practice;</li> <li>(f) evaluate the practicability of implementing best practice measures; and</li> <li>(g) propose a timeframe for implementing all practicable best practice mitigation measures.</li> </ul> The methodologies and outcomes of the audit must be contained in a detailed report submitted to the EPA by no later than 30 June 2017. The Best Practice Management Review for Particle Emissions will be formalised as a condition of the Licence.	16	Contained in the OEMP	Compliant
E2	Requirement to maintain 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 Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA by 30 November 2018. The financial assurance must be in favour of the EPA for a total amount to be held by the EPA of one million, seven hundred thousand dollars (\$1,700,000.00). 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.	5	Provided in three amounts of \$700,000 in December 2016, \$500,000 in October 2017 and another \$500,000 in December 2018	Compliant
E2.2	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.	Noted		Compliant

Condition/ Requirement	Requirement	Evidence (ID Number)	Audit Findings and Recommendations	Compliance Status
E2.3	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.	Noted		Compliant
E2.4	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.	Noted		Compliant
E2.5	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.	Noted		Compliant
E3	Environmental Obligations of Licensee			
E3.1	While the licensee's premises are being used for the purpose to which the licence relates, the licensee must: 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. 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. c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.	24, 17		Compliant
E3.2	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: a) Make all efforts to contain all firewater on the licensee's premises; b) Make all efforts to control air pollution from the licensee's premises; c) Make all efforts to contain any discharge, spill or run-off from the licensee's premises; d) Make all efforts to prevent flood water entering the licensee's premises; e) Remediate and rehabilitate any exposed areas of soil and/or waste; f) Lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of; g) At the request of the EPA monitor groundwater beneath the licensee's premises and its potential to migrate from the licensee's premises; h) At the request of the EPA monitor surface water leaving the licensee's premises; and i) Ensure the licensee's premises is secure.	24	Pollution Incident Response Management Plan in place and tested as required.	Compliant
E3.3	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: a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; and b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination.	Noted		Compliant
E4	EPA may claim Financial Assurance			
E4.1	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.	Noted		Compliant

**Table A3 – Best Management Practices**

Best Practise Guideline	Present on Site/Achieves best practice	Comment
<b>Key Risk Areas</b>		
Dust from the delivery, storage and transfer and processing of waste received at the facility	Yes	These areas were inspected and found to be satisfactory

Water Management System	Yes	At least three levels of sediment control pondage is provided
Noise from delivery and handling of materials	Yes	Level 2 Noise meter was used around the site with all levels equal to or less than noise impact assessment
Polluted runoff water from the hardstand and waste storage areas	Yes	All runoff passes through at least 3 sediment ponds
Storage of chemicals and fuels	Yes	These areas were inspected and found to be satisfactory
Inappropriate disposal of waste	Yes	These areas were inspected and found to be satisfactory
<b>Dust</b>		
Stockpiles are defined by physical barriers on non active sides to provide containment	Yes	These areas were inspected and found to be satisfactory
Stockpiles are fitted with functional, well-maintained, effective sprinkler systems	Yes	These areas were inspected and found to be satisfactory
Define maximum stockpile height	Yes	Height governed by maximum gantry level which is less than 20 m
Dampen materials being moved around the site to control dust	Yes	Water sprays provided on all discharge points
Shield stockpiles from the wind	Yes	Stockpiles are located centrally on site
Enclose or cover conveyors and fit them with belt cleaners	Yes	These areas were inspected and found to be present
Clean up spilt material immediately to prevent contamination of waterways	Yes	These areas were inspected and found to be satisfactory
Sealed internal roadways	No	Not all internal roadways are sealed
Use of street sweeper	Yes	Streetsweeper in operation on site
Use of dedicated water cart	Yes	Water cart operates on site and available when needed
Use wheel-wash facilities to stop the spread of waterway contaminants	Yes	This area was inspected and found to be present
<b>Waste receival Area</b>		
Water sprays available at receival area	Yes	These areas were inspected and found to be satisfactory
Wind barriers for receival area	Yes	These areas were inspected and found to be satisfactory
Water sprays available in sorting area	Yes	This area was inspected and found to be present

<b>Crushing and Screening</b>		
Water sprays available in primary crushing area	Yes	This area was inspected and found to be present
Water sprays available in secondary crushing area	Yes	This area was inspected and found to be present
Water sprays available on conveyor belts	Yes	This area was inspected and found to be present
Water sprays available at transfer points	Yes	This area was inspected and found to be present
Water sprays available on screens	Yes	This area was inspected and found to be present
Water sprays available on picking belts or similar areas	Yes	This area was inspected and found to be present
Transfer conveyors equipped with wind shielding	Yes	Small but visible on exposed conveyor points
Conveyor belts - spill trays to capture spillage fitted to contain spillage and dust accumulation	Yes	This area was inspected and found to be present
Conveyor belts - smooth operation ensured by regular maintenance and maintenance records kept	Yes	These areas were inspected and found to be satisfactory
Spills from conveyor belts and other equipment monitored and promptly cleaned	Yes	These areas were inspected and found to be satisfactory
<b>Blending Plant</b>		
Cement silos loaded under vacuum	Yes	This area was inspected and found to be present
Dust filters fitted to silos	Yes	This area was inspected and found to be present
Alarm system available in the event of overloading of filtration	Yes	This area was inspected and found to be present
Loadout dust controls such as lowered Shute	Yes	This area was inspected and found to be present
<b>Hardstand Area Dust Controls</b>		
Hardstand or paved or sealed surfaces	Yes	Main hardstand areas sealed, external roadways sealed
Hardstand - installed across entire site	Yes	Hardstand areas in all working sites, use of gravel
Hardstand - all internal roadways sealed	No	Some internal roadways are not sealed
Hardstand - installed in key production areas:	Yes	Hardstand areas in all working sites, use of gravel
Hardstand – appropriately designed, contoured and bunded	Yes	This area was inspected and found to be present
Hardstand - adequately maintained by regular cleaning to prevent tracking out of contaminants	Yes	This area was inspected and found to be present
Hardstand - management process in place to prevent and promptly clean spillages	Yes	These areas were inspected and found to be satisfactory
Street sweepers or sweeper attachments on front-end loader/forklift used to clean the hardstand	Yes	These areas were inspected and found to be satisfactory



Hardstand - management process in place to prevent dust accumulation on driveways, internal roads, along property boundaries, etc.	Yes	These areas were inspected and found to be satisfactory
Speed limit on internal unsealed roads enforced (to 'drop dust')	Yes	10km speed limit enforced
<b>Truck loading</b>		
Trucks equipped with covers	Yes	Automatic covers on all trucks observed
Trucks leave premises via wheel wash	Yes	Observed during site inspection
<b>Boundary screening</b>		
Additional screening at boundaries of premises and around dust-generating areas where physically possible	Yes	These areas were inspected and found to be satisfactory
<b>Noise</b>		
<b>Minimising Noise- general procedures</b>		
All individual sources of noise pollution on site identified	Yes	Identified in Noise Management Plan
Minimising noise emissions considered as part of the Environmental Management System	Yes	Noise is identified as a risk area, monitoring data shows operation is inaudible at nearest receptor
Plan for noise mitigation for each possible point source and implement where appropriate	N/A	No further noise mitigation is planned but none have been identified as being necessary
<b>Enclosure of noise (at point source)</b>		
All pumps and electric motors enclosed	Yes	Where applicable
All compressors enclosed, where it is safe to do so without causing over heating	Yes	Where applicable
Compressors located where buildings act as a noise buffer	Yes	Within workshop
All pressure-operated equipment fitted with silencing devices	Yes	Standard silences used
All engines fitted with efficient muffling devices	Yes	Maintenance schedule includes inspection of mufflers
<b>Sound-barriers and buffers (prevention of noise travel over distance)</b>		
Buffers between plant and neighbours erected (screens, barriers, trees, shrubs, etc.)	Yes	Location well away from residential receptors
Noise-generating equipment located behind sound barriers or other absorbers	Yes	Where applicable
<b>Locating within site to increase distance to sensitive receptors</b>		
Entrance and exits sited away from noise sensitive areas	Yes	Location well away from residential receptors
Noise-generating equipment located away from noise sensitive areas	Yes	Location well away from residential receptors

Sirens located away from sensitive areas and used only in an emergency	Yes	
<b>Substituting quieter equipment</b>		
Visual alarms used in lieu of audible alarms, where appropriate and not contravening OHS requirements	Yes	Quacker style reversing alarms used
Agitator truck and mobile plant reversing alarms are 'squawker type' rather than 'beepers'	Yes	Quacker style reversing alarms used
<b>Maintenance</b>		
Regular good practice maintenance of all equipment, heavy machinery and trucks and maintenance records kept	Yes	Records sighted during interview
Regular good practice maintenance of all sound-reducing equipment and maintenance records kept	Yes	Records sighted during interview
<b>Operating hours</b>		
Operating only within approved operating hours	Yes	Consent limited hours adhered to
Operation of trucks and heavy machinery to appropriate hours wherever practicable	Yes	Consent limited hours adhered to
If operating outside normal business hours for specific circumstances, liaise with the local community	Yes	Consent limited hours adhered to
<b>Community liaison</b>		
Liaise with the local community to prevent, and promptly respond to and resolve issues	Yes	Complaints register kept
System for capturing and addressing community complaints in place	Yes	Complaints register kept
<b>Water</b>		
<b>Process water capture and recycling</b>		
Plants operate to a well-developed water management plan	Yes	Plan has been completed
Stormwater management plan regularly reviewed	Yes	Plan has been completed
Plans available on site for inspection	Yes	Plan was available during site inspection
All process water from waste processing recycled back into production via a fully integrated system including, collection, reclamation, capacity storage, and re-use	Yes	Inspected during audit, water recycling initiatives based on removal of water from contained pollution control ponds
Process water recycling system is fully isolated from stormwater drains		
Stormwater is directed to a sump to be recycled and does not divert to stormwater drains	Yes	Water recycled back into process circuit
<b>Stormwater capture on site (First flush capture)</b>		

Tank storage capacity above includes provision for first flush, contaminated water capture following rain events	Yes	These areas were inspected and found to be satisfactory
First flush storm water capture in place	Yes	These areas were inspected and found to be satisfactory
First flush system size: system contains and re-uses runoff from first 20 mm of rain over a 24-hour period	Yes	Site contains all runoff from rainwater other than major storm events, above 120mm. Site area insufficient to recycle sufficient water to avoid use of town water supply.
First flush storage size calculated based on surface area that generates polluted run-off: storage capacity (m <sup>3</sup> ) = 0.02 (m) x catchment area (m <sup>2</sup> )	Yes	Site contains all runoff from rainwater other than major storm events (above 120 mm).
<b>Stormwater drains</b>		
Process water recycling system fully isolated from storm water drains	Yes	Water harvesting within dirty water circuit to assist with recycling initiatives and dust control
Triple interceptor system or equivalent in place for water treatment prior to discharge	Yes	Three stage pollution control system
Triple interceptor or equivalent system sediment-settling pits are regularly maintained	Yes	All records of desilting available
Triple interceptor or equivalent system final water: pH monitored and adjusted prior to discharge and pH records kept	Yes	Monitoring records kept
Triple interceptor or equivalent system: final turbidity monitored and adjusted prior to discharge and NTU records kept	Yes	Solids loading in the two pollution control ponds are monitored monthly
If any stormwater drain discharges need to occur: discharges take place via the triple interceptor or equivalent system, and only after water pH and turbidity requirements are adjusted and met	No	Solids loading in the two pollution control ponds are monitored monthly however no treatment is provided
<b>Ensure all systems in place to guarantee only clean water leaves site</b>		
First Flush system in place	Yes	Inspected and found satisfactory
Triple interceptor system or equivalent in place	Yes	Inspected and found satisfactory
Oil /water separator systems in place	Yes	Inspected and found satisfactory
Uncontaminated storm water diverted away from all areas where contaminants may occur	Yes	Front clean apron only, the rest of the site lies within dirty water catchment which is controlled
Dedicated roofed chemical storage area in place	Yes	Inspected and found satisfactory
The following are located within bunded areas or within other secondary containment areas		

Chemical and fuel delivery & dispatch	Yes	Inspected and found satisfactory
Chemical, including admixtures storage	Yes	Inspected and found satisfactory
Piping and transfer areas	Yes	One small area lies outside the bund which is controlled by a self contained bunding system
Process tanks areas	Yes	Inspected and found satisfactory
Vehicle/equipment cleaning areas	Yes	Inspected and found satisfactory
Fuel, fuel additives, lubricants, oil storage area	Yes	Inspected and found satisfactory
Derived liquid wastes	Yes	Inspected and found satisfactory
<b>Chemical and liquid storage area (including chemical waste storage)</b>		
Dedicated roofed impervious solid walled bunded area	Yes	Inspected and found satisfactory
All fuel and admixture tanks must be fully bunded	Yes	Inspected and found satisfactory
Isolated from storm water or recycled water to prevent rain entry, pollutant overflow, rusting of metal drums and storm water or recycled water contamination	Yes	Shipping container provided for metal drums
Well-ventilated e.g. vents in walls, ceiling, or open windows to cool, and prevent fume build-up	Yes	Inspected and found satisfactory
Bund holds 110% volume of largest tank or 25% maximum drum inventory, whichever greater	Yes	At least 140% of largest vessel and 110% of all combined with average total holding
Bund holds 110% of combined volume of ALL tanks where tanks are connected	Yes	Inspected and found satisfactory
Containers and tanks set back from edge of bund	Yes	Meets AS1940 requirements
Drain valves and pump-out valves locked in closed position	Yes	Inspected and found satisfactory
Storage segregated to keep apart materials that cannot be stored safely together	Yes	Inspected and found satisfactory
Clearly labelled, displaying relevant warning signs and well lit	Yes	Inspected and found satisfactory
Regularly inspected and maintained (whole area and bunding) to ensure free from cracks	Yes	Inspected and found satisfactory
Chemical spill kits on site that is prominently sited & labelled, is service-ready with relevant staff trained in its use	Yes	Inspected and found satisfactory
Secured against unauthorised access	Yes	Inspected and found satisfactory
<b>Acceptable types of temporary bunding or other secondary containment</b>		

Temporary bunds may not replace chemical storage requirements above, and are non-combustible, resistant to chemicals stored and positioned to prevent flow out of the bund	Yes	No temporary bunding on site however one vessel has a self bunded pallet.
Commercial pallet bunding units may be used for minor temporary chemical storage	Yes	No temporary bunding on site however one vessel has a self bunded pallet.
Splash shields may be used to deflect leaks within a bunded area	Yes	Inspected and found satisfactory
<b>Chemical management &amp; handling (including waste chemicals)</b>		
Chemicals ordered/stored in smallest quantity practicable to reduce storage needs	Yes	Boral maintain adequate systems to ensure volumes kept on site a minimised to only that required.
Surplus chemicals do not accumulate	Yes	Systems in place to minimise on site storage requirements.
Up-to-date records of chemicals and volumes stored	Yes	Records sighted
Safety Data Sheets (SDS) on site that are up-to-date, accessible and are applied in practice	Yes	Records sighted
Containers are labelled and display hazard ratings from point of entry to correct disposal	Yes	Inspected and found satisfactory
Staff adequately trained in chemical use and safety	No	Records to not include training of staff on chemical usage, handling and storing
Staff read and understand chemical labels and SDS of products they use	Yes	Inspected and found satisfactory
Emergency management plan is in place to manage spills	Yes	Inspected and found satisfactory
Chemical spills/leaks are cleaned-up promptly and no chemicals leave the site and escape to the environment	Yes	Inspected and found satisfactory
Additional storage requirements for acids and flammable chemicals is in place	Yes	Acid cleaning products stored separately
<b>Cleaning of all plant and equipment is managed to prevent or minimise contamination of soil and water</b>		
Use of all wash chemicals and detergents minimised	Yes	Truck wash
Least environmentally toxic wash chemicals and detergents used	Yes	Only water is used in the dust suppression system
Dedicated equipment washing area segregates this water from process water recycling	No	This water is combined in the dirty water system and recycled.
Truck and equipment wash areas drain to separate water collection and recycling pits which may not be connected to process water sediment settling pits and recycling system	Yes	Pits are used for cement truck washing which can be cleaned out

Wash chemicals prevented from entering stormwater drains in all other ways	Yes	Only water used in dust suppression system. Fluids from the workshop remain separate
<b>Environmental Management System</b>		
Risk Assessments	Yes	Records provided
Staff training	Yes	Records provided
Employee Inductions	Yes	Records provided
Truck tracking	Yes	Records provided
Maintenance	Yes	Records provided
Contractor training	Yes	Records provided

## Appendix B – Documents Sighted and Reviewed

ID No.	Title	Date	Summary
1	Widemere Recycling Facility EIS	May 2015	EIS in support of SSD 6525
2	Report on assessment of DA-21-1-2002	Nov 2002	Assessment report for original DA, prepared by the Department of Planning
3	Widemere Statement of Environmental Effects	July 2017	SEE for MOD 1 SSD 6525
4	Widemere Independent Environmental Audit	23 March 2018	First Independent Environmental Audit of the facility prepared by Element Environmental
5	Widemere Independent Environmental Audit	July 2021	Second Independent Environmental Audit of the facility prepared by Molino Stewart
6	Operation Environmental Management Plan	7 May 2018	First version of the OEMP prepared by EMM Consultants
7	Waste Monitoring Program	5 April 2018	Prepared by EMM consultants
8	Boral Recycling Inspection and Receivals Protocol	31 March 2018	Internal document which forms part of the Waste Monitoring Program
9	Recovered Aggregate Order 2014 Inspection and Test Plan	N/A	Internal document which forms part of the Waste Monitoring Program
10	Correspondence from Boral to EPA	27 October 2017	Consultation letter to EPA in relation to Waste Management, Noise Management and Dust Management plans
11	Correspondence to Boral from DPE	22 January 2018	Advice from DPE in relation to Waste Management, Noise Management and Dust Management plans
12	Correspondence from Boral to Waste Compliance Group of EPA	27 October 2017	Consultation letter to EPA in relation to Waste Management, Noise Management and Dust Management plans
13	Noise Management Plan	12 October 2017	Prepared by EMM Consultants
14	Dust Management Plan	January 2018	Prepared by Ramboll Environ for EMM Consultants
15	Groundwater Monitoring Program	June 2017	Prepared by EMM Consultants
16	Surface Water Monitoring and Mitigation Plan	April 2017	Prepared by Royal Haskoning DHV on behalf of EMM Consultants
17	Operational Environmental Management Plan	27 May 2021	Updated OEMP, stated as version 9, prepared by EMM Consultants

18	Waste Management Plan	May 2021	Updated plan prepared by EMM Consultants
19	Noise Management Plan	May 2021	Updated Noise Management Plan prepared by EMM Consultants
20	Groundwater Monitoring Program	26 May 2021	Updated GMP contained in the OEMP prepared by EMM Consultants
21	Surface Water Characterisation Assessment	April 2017	Prepared by Royal Haskoning DHV
22	Detailed Detection of Analytes Collation and commentary	April 2017	Prepared by Victory Engineering, document also includes trigger levels referred to in the Surface Water Management Plan
23	Widemere Recycling Facility Emergency Response Plan	September 2020	Prepared by Boral
24	Widemere Recycling Facility Pollution Incident Response Management Plan	August 2023	Version 15 prepared by Boral
25	Groundwater Investigations	February 2017	Prepared by EMM Consultants
26	Air Quality Audit Report	July 2022	Prepared by EMM Consultants
27	Annual Review 2020	16 July 2021	Annual Review November 2019 to November 2020
28	Annual Review 2021	19 January 2022	Annual Review November 2020 to November 2021
29	Annual Review 2022	31 May 2023	Annual Review November 2021 to November 2022
30	Memorandum EMM SWDCA and SWMMP	17 June 2020	Memorandum prepared by EMM in relation to Surface Water Discharge Characterisation Assessment, Surface Water Mitigation and Monitoring Plan and Surface Water Validation Report to address EPL conditions
31	Groundwater Monitoring Plan	May 2022	Updated Groundwater Monitoring Plan prepared by EMM Consultants
32	Widemere Environment Permit Planner 2024	November 2023	Internal Boral spreadsheet which documents each condition of approval and licence condition and specifies actions and documentation required to ensure verification
33	Surface Water Lab Test Report	Monthly	Monitoring Point 1- EPL#2 (Discharge Point)
34	Gravimetric Dust Monitoring Lab Test Report	Monthly	Deposited Dust sites 1and 2
35	Groundwater results summary	30 August 2023	TRH Volatiles/BTEX, major cations, dissolved metals, alkalinity, ionic balance



36	Annual Noise Monitoring Assessment	November 2023	Prepared by MAC, includes assessment results and discussion P3 (EPA3), P4 (EPA4) and P5 (EPA5)
37	POELA Air/Dust Environmental Monitoring Report	August 2023	Deposited dust monthly monitoring results for Site 1 (EPL ID#1)
38	Widemere Recycling Facility (EPL 11815) – EPL Notice of Variation	10 October 2023	Boral response to EPA proposed EPL conditions, revised licence
39	Groundwater Monitoring Program Letter to DPE	18 January 2017	Engagement of EMM to conduct Groundwater Monitoring Program
40	Groundwater Monitoring Program Letter to EPA	18 January 2017	Engagement of EMM to conduct Groundwater Monitoring Program
41	Letter to DPE re surrender of DA 21-1-2002-	6 March 2018	As per condition B23 of SSD 6525
42	EPL Notice of Variation 1	19 October 2023	Amendments of Condition O8.1
43	Letter to EPA re Update to Surface Water Quality Management Plans	27 January 2021	Discussion of revised SWMMP
44	EPL Licence Variation Notice No. 1622854	20 October 2023	Notice of Variation of Licence issued
45	Email from EPA re licence requirement and site visit follow up	20 September 2022	The requirements of the three PRPs have been satisfied
46	Notice of Variation of Licence		Notice 1622854
47	Draft Licence Variation Notice No. 1622854	25 September 2023	Draft variation for review and comment
48	Draft Licence Variation Notice No. 1622854	13 October 2023	Draft variation for review and comment
49	EPA Letter re Compliance with PRPs	21 July 2021	EPA requesting correspondence re management of surface water
50	EPA email from site inspection	17 February 2021	Outcomes of site inspection
51	Email correspondence of discharge incident	27 July 2020	R3 report of incident in accordance with Condition R3.3 of the EPL 11815
52	Response letter to EPA re site inspection	26 February 2021	Summary of actions taken to address the areas of improvement
53	EPA Advisory letter – Storage of Dangerous Goods and Compliance	23 March 2021	Summary of non-compliances with the Standards and actions to be taken

54	EPA Compliance Audit Report	13 July 2021	Audit of Compliance with Resource Recovery Order
55	Notice of Variation Letter to EPL	13 July 2023	Draft conditions and comments
56	Confirmation receipt email from EPA	24 February 2022	Sediment dam discharge reporting
57	Letter to EPA re Surface Water Quality Management Plans	27 January 2021	Response to email requesting further information on SWCA and SWMMP
58	Water Management Discussion Emails with EPA	27 January 2021	Formal response to the EPA letter DOC17/457692 dated 6 September 2017
59	Request for Information from DPE for Annual Review	8 September 2023	Request of EPA notifications of overflow events, EPA responses to notifications, details of actions resulting from notifications.
60	DPE Receipt of submission of Air Quality Audit	11 November 2022	Receipt of submission of Air Quality Audit
61	Air Quality Audit- Response to Auditor Recommendations	28 October 2022	Air Quality Audit- Response to Auditor Recommendations
62	Transport Code of Conduct - Boral Recycling Widemere	September 2023	Original site Transport Code which is reviewed and updated annually. Last review September 2023
63	Boral letter to DPE	23 Nov 2023	Response to DPE re 2021 OEMP lodged in July 2023
64	Material Analysis Classification	July 2023	Chemical analysis of waste and waste classification undertaken by ADE consulting
65	Internal laboratory Waste analysis	2023	Boral Material Testing laboratory results of product quality as per Recovered Aggregate Order 2014
66	Email from DPE (Bianca Thornton)	12 March 2018	Correspondence in relation to comments from DPE on the OEMP inclusive of component management plans

# Appendix C – Site Photographs



Receival Area and Weighbridge



Breaker in receival yard



Street Sweeper



Overview of receival yard



Delivery of broken concrete



Delivery of waste concrete from batch plant



Delivery of waste concrete from batch plant



Delivery of waste concrete from batch plant



Delivery of bricks



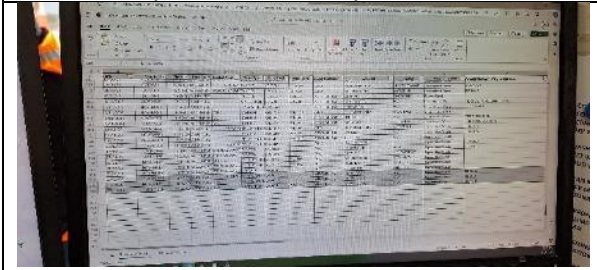
Delivery of waste concrete



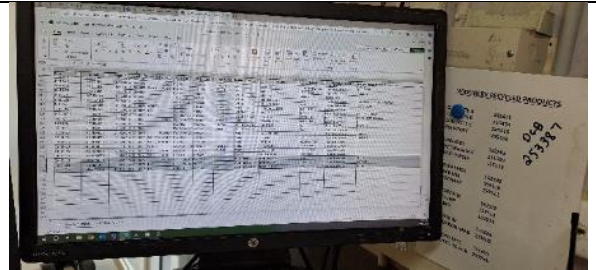
Yard area tip off and load inspection



Yard area tip off and load inspection



Weighbridge register detailing deliveries



Computer registry noting rejected loads



Street Sweeper working roadways



Water truck in operation



Designated pedestrian pathways and water truck



Roadside water sprays



Roadway drains showing broken concrete



Gas cylinders in locked facilities



Oil Separator



Spill containment materials



Workshop apron



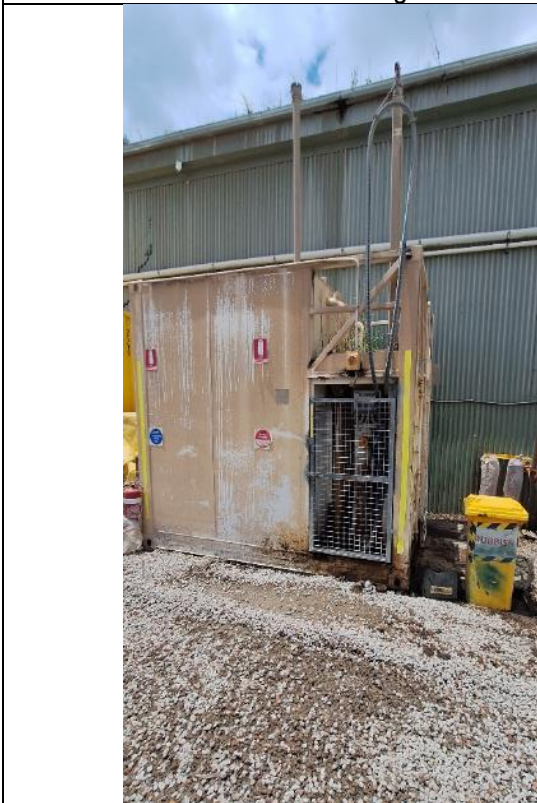
Workshop dry stores



Drum stores with internal bunding



Oil stores with separate bunding



Workshop external area



Stockpiles and conveyor gantry



Water sprays on unsealed roadways



View of yard with equipment parking bays



Overhead gantry with water sprays



Processing plant



Product stockpile with overhead gantry sprays



Northern sediment pond with water entry point



Northern sediment pond with pontoon



Divide between ponds



Southern pond with pontoons



Pumping infrastructure and storage tanks



Southern pond showing off site discharge point



Southern pond showing off site discharge point



Pond lining indicates high water mark



Low point between ponds showing overflow



Water sprays on unsealed roadways



Unsealed roadway controlled by water cart



Direct delivery of waste concrete from mixer



Direct deliver of waste concrete from mixer



Unsealed roadway to batch plant



Blockage relief valving on batch plant



Concrete Batch Plant with sediment pond and delivery pipework for cement



Concrete lined dirty water drain running around the site



Product loading



Product stockpile area





Product stockpile area controlled by water cart



Batch plant drainage sump



Batch plant access road drains



Batch plant access road drains



Temporary walkway over damaged drain



Concrete lined drainage sump



Concrete lined drainage sump



Concrete lined drainage sump



Two drains on either side of perimeter roadway



Unsealed roadway



Drainage sump



Outside stores area



Drainage sump and stores area



Overview of site



Overview of site



Overview of site



Landscaping near carpark area



Carpark area and site entry road



Carpark and pedestrian access way



View of entry to office and inspection weighbridge



Product leaving site via wheel wash



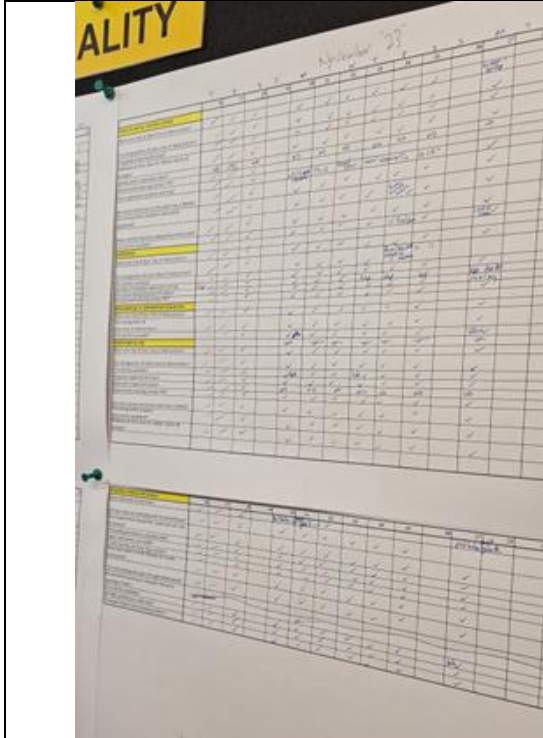
Product leaving site via wheel wash



Training room



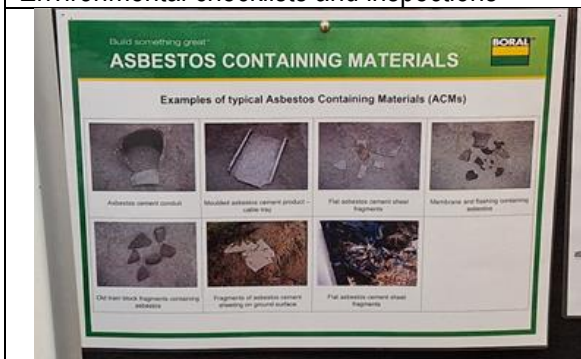
Training room



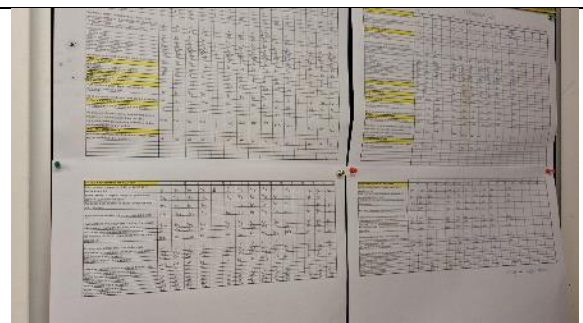
Environmental checklists and inspections



Environmental checklist



Training materials for asbestos identification



Environmental checklists and inspections



## **Appendix D – Authority Consultation**

---



DOC23/873550-1

Robert Byrnes  
International Environmental Consultants  
700 Wombeyan Caves Road  
HIGH RANGE NSW 2575

By email: robert.byrnes@iec.com.au

Dear Robert Byrnes

**Independent Environmental Audit – Boral Recycling Pty Limited – Widemere Recycling,  
Wetherill Park NSW 2164**

I refer to your email on 3 October 2023 to the NSW Environment Protection Authority (EPA) requesting advice on any issues or concerns the EPA may wish to be considered during the Independent Environmental Audit (IEA) of Environment Protection Licence (EPL) No. 11815 (the licence), issued to Boral Recycling Pty Limited for the Widemere Recycling premises.

The EPA make the following observations:

1. The Boral Recycling Pty Limited (the licensee) holds EPL No. 11815 for the premises issued under the *Protection of the Environment Operations Act 1997* (the Act). The licence was issued on 21 February 2003. A copy of the licence is available on the EPA's Public Register at <https://apps.epa.nsw.gov.au/prpoeoapp/>. Based on the information available on the licensee's [website](#), the premises utilises recovered construction and demolition (C&D) wastes to produce various building and construction products.
2. The licensee retains primary responsibility for the environmental performance of its activities carried out at the premises. The onus is on Boral Recycling to ensure compliance with the Act and associated regulations as well as all licence requirements.
3. In 2016, the EPA placed a Pollution Reduction Program (PRP) on the licence to assess the impacts on water quality associated with the activities undertaken at the premises. On 11 August 2021 the *Surface Water Mitigation and Monitoring Plan* (SWMMP) required by Condition U1.14 was submitted to EPA and a licence variation is currently being finalised to amend the PRP and incorporate further monitoring based on the findings. The intent is to incorporate a validation/monitoring report to ascertain the ongoing effectiveness of the implemented mitigation measures to minimise water pollution during discharge events.
4. On 17 February 2021, the EPA inspected the premises and observed a number of non-compliances with the Licence conditions and Australian Standards. The non-compliances related to storage of dangerous goods and evidence of a spill, waste stockpile labelling, and appropriate delineation of tip and spread area from the storage/processing areas. The licensee has since rectified the non-compliances and an Advisory Letter was issued by EPA on 25 March 2021.

Phone 131 555  
Phone 02 9995 5555  
(from outside NSW)

TTY 133 677, then  
ask for 131 155

Locked Bag 5022  
PARRAMATTA  
NSW 2124

6&8 Parramatta  
Square 10 Darcy  
Street  
PARRAMATTA NSW  
2150

info@epa.nsw.gov.au  
www.epa.nsw.gov.au  
ABN 43 692 285 758

5. On 29 April 2021 the EPA carried out an unannounced audit inspection of the premises to assess compliance with the Resource Recovery Order for the supply of recovered aggregate waste 2014 to which the relevant Resource Recovery Exemption 2014 applies. The required actions to ensure compliance have been completed and a copy of the final audit report is available on the EPA's Public Register.
6. The licence contains a range of conditions to protect the environment including limit, operating, monitoring, and reporting conditions. Details of any reported non-compliances and the EPA response for the audit period may be viewed on the EPA's Public Register.
7. The following requirements in relation to the premises should also be considered:
  - Pollution monitoring data is required to be published on the licensee's [website](#), in accordance with Section 66(6) of the Act. The EPA's [Requirements for Publishing Pollution Monitoring Data](#) sets out the written requirements that EPL holders should follow.
  - All holders of EPL's are required to prepare a Pollution Incident Response Management Plan (PIRMP) in accordance with Section 153A of the Act. A copy is available on the licensee's [website](#). To assist licensees with preparing a PIRMP, the EPA has developed a [PIRMP Guideline](#), which provide details on the legislative requirements, and how to prepare, test and implement the plan.
  - The licence requires the licensee to maintain a register of complaints it receives in relation to the premises. The licensee has not reported receiving any complaints since 2017.
  - The licence requires the licensee or its employees to 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. The licensee has not reported any incidents since February 2022 (Extreme rainfall events lead to the discharge of retention basins).
8. The licensee's [website](#) contains information that should be considered as part of the audit. This includes:
  - Previous IEA reports which include identified non-compliances and proposed recommendations
  - Annual review reports
  - An Operational Environment Management Plan (OEMP), and
  - A complaints register.

If you have any further questions about this matter, please contact Jay Conte by telephoning 02 6983 4919 or by electronic mail to [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au).

Yours sincerely



19 October 2023

**JAMES BOYLE**

Unit Head - Regulatory Operations

12 October 2023

TfNSW Reference: SYD14/00524/06

Laura Evert  
Department of Planning and Environment  
RE: Windemere Waste Facility SSD-6525 MOD 2  
Locked Bag 5022  
Parramatta NSW 2124

---

**INDEPENDENT AUDIT  
WIDEMERE WASTE FACILITY  
38 WIDEMERE ROAD  
WETHERILL PARK**

Dear Laura,

Relevant to SSD-6525 MOD 2 as referred to Transport for NSW (TfNSW), while no further comment is raised by TfNSW in response to the audit requirements for Condition D7, please note relevant to Condition (a), no queues to extend onto the public road.

Should you have any further enquiries in relation to this matter, please do not hesitate to contact Brett Morrison, Development Assessment Officer, by email at [development.sydney@transport.nsw.gov.au](mailto:development.sydney@transport.nsw.gov.au).

Sincerely,



**Muriel Maher**  
Senior Coordinator Land Use  
Planning and Programs  
Greater Sydney Division

---

OFFICIAL



**robert.byrnes@iec.com.au**

---

**From:** Maria Divis <Maria.Divis@planning.nsw.gov.au>  
**Sent:** Thursday, 12 October 2023 10:48 AM  
**To:** robert.byrnes@iec.com.au  
**Cc:** 'Lauren Sibigtroth'  
**Subject:** RE: Independent Audit - Widemere Recycling Facility Wetherill Park

Good morning Robert

Thank you for consulting with the Department of Planning and Environment (**NSW Planning**) in order to obtain input into the scope of the Independent Environmental Audit (**IEA**) for SSD 6525, as modified (the **consent**).

NSW Planning would like for the IEA to provide an assessment of the environmental performance of the project, with a focus on **Surface Water Management**. Please review the requirements of the consent, Environmental Management Plans and EPL, and assess the project's performance in this area. This detail is to be provided in addition to the IEA requirements outlined in the Conditions of Consent and Independent Audit Post Approval Requirements 2020 available on our website and [here](#).

For further enquiries, please contact me on the below details.

Kind regards,

**Maria Divis**  
**Senior Compliance Officer**

Planning & Assessment | Department of Planning and Environment  
**T** 02 8275 1156 | **E** [Maria.Divis@planning.nsw.gov.au](mailto:Maria.Divis@planning.nsw.gov.au)  
Locked Bag 5022 | PARRAMATTA NSW 2124  
[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



*The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

---

**From:** robert.byrnes@iec.com.au <robert.byrnes@iec.com.au>  
**Sent:** Tuesday, 3 October 2023 4:00 PM  
**To:** DPE CSE Information Planning Mailbox <information@planning.nsw.gov.au>; Maria Divis <Maria.Divis@planning.nsw.gov.au>  
**Cc:** 'Lauren Sibigtroth' <Lauren.Sibigtroth@boral.com.au>  
**Subject:** Independent Audit - Widemere Recycling Facility Wetherill Park

Hi Maria

As you are aware, Boral has engaged me to undertake an independent audit of the Widemere Recycling Facility, Wetherill Park in accordance with Condition D7 of SSD6525. As required by the post approval guidelines, I am required to consult with any relevant government agencies. To this end I have sent consultation emails to the EPA, Fairfield City Council and Transport for NSW. The purpose of this email is to seek any specific issues that the Department of Planning may wish to have included in the scope of the audit or additional agencies that you wish consulted. Please note that the consent does not include a formal Community Consultative Committee or similar so at this stage there are no community stakeholders within the consultation list.

Kind Regards

Robert Byrnes  
International Environmental Consultants  
"Longmead"  
700 Wombeyan Caves Road  
High Range NSW 2575  
Phone: 02 48785502  
Mobile: 0417437120



Virus-free. [www.avast.com](http://www.avast.com)

**robert.byrnes@iec.com.au**

---

**From:** Jay Conte <jay.conte@epa.nsw.gov.au>  
**Sent:** Friday, 20 October 2023 10:00 AM  
**To:** robert.byrnes@iec.com.au  
**Subject:** RE: Independent Audit - Widemere Recycling Facility Wetherill Park  
**Attachments:** OPS - OUT - Letter - EPA response to pro~recycling Pty Limited - Widemere Recycling - Wetherill Park - J Conte - 13102023.PDF

Hi Robert,

Please find attached the EPA response to your below request for advice for the Independent Environmental Audit of Environment Protection Licence (EPL) No. 11815 issued to Boral Recycling Pty Limited for the Widemere Recycling premises.

Kind regards,  
Jay

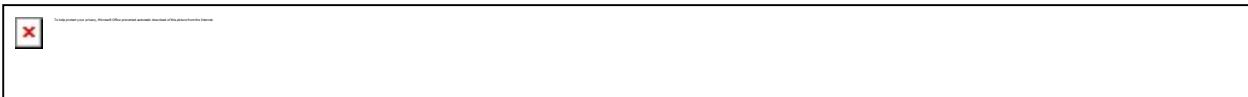
**Jay Conte** (*they/them*)  
Operations Officer  
Regulatory Operations  
NSW Environment Protection Authority  
D 02 6983 4919 | M 0436 436 690



[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au) @NSW\_EPA

The EPA acknowledges the Traditional Custodians of the land, waters and sky where we work. As part of the world's oldest surviving cultures we pay our respect to Aboriginal Elders past, present and emerging.

I work on Dharawal Country.



Report pollution and environmental incidents 131 555 or +61 2 9995 5555

---

**From:** [robert.byrnes@iec.com.au]  
**Sent:** 03/10/2023 15:54  
**To:** [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)  
**Cc:** [lauren.sibigtroth@boral.com.au](mailto:lauren.sibigtroth@boral.com.au)  
**Subject:** Independent Audit - Widemere Recycling Facility Wetherill Park

Dear Sir/Madam

I have been engaged to undertake an independent audit of the Widemere Recycling Facility, Wetherill Park. The audit is a requirement of Condition D7 of State Significant Development approval SSD6525 which I have attached for your information. The audit scope will include compliance with the Development Consent and Environment Protection Licence conditions, an assessment of the environmental performance of the facility and a review of the

adequacy of management strategies in place to maintain compliance. I would appreciate your advice on any issues of concern to the EPA or other matters which you would like included or addressed as part of the audit. To achieve the required audit timeframe we would appreciate receiving your input by mid October. If you require any further information or clarification please do not hesitate to contact me.

Kind Regards

Robert Byrnes

International Environmental Consultants

“Longmead”

700 Wombeyan Caves Road

High Range NSW 2575

Phone: 02 48785502

Mobile: 0417437120



Virus-free. [www.avast.com](http://www.avast.com)

-----  
-----  
This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately. Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment, Energy and Science.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL



ref:\_00D7F6iTix.\_5007F1PrQAY:ref

-----  
-----  
This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

**robert.byrnes@iec.com.au**

---

**From:** Brett Morrison (TAR TECHN) <Brett.Morrison4@transport.nsw.gov.au>  
**Sent:** Thursday, 12 October 2023 6:24 PM  
**To:** robert.byrnes@iec.com.au  
**Subject:** RE: Independent Audit - Widemere Recycling Facility Wetherill Park  
**Attachments:** 20231012 - TfNSW Response RE\_ SYD14\_00524.pdf

Please find attached advice.

**Brett Morrison**

Senior Land Use Planner  
Land Use Assessment Western  
Planning and Programs  
Greater Sydney  
**Transport for NSW**

E [Brett.Morrison4@transport.nsw.gov.au](mailto:Brett.Morrison4@transport.nsw.gov.au)

27-31 Argyle Street  
Parramatta NSW 2150



**Transport  
for NSW**



I acknowledge the Aboriginal people of the country on which I work, their traditions, culture and a shared history and identity. I also pay my respects to Elders past and present and recognise the continued connection to country.

Please consider the environment before printing this email.

OFFICIAL: **Sensitive – NSW Government**

---

OFFICIAL

**From:** robert.byrnes@iec.com.au <robert.byrnes@iec.com.au>  
**Sent:** Tuesday, 3 October 2023 4:51 PM  
**To:** Development Sydney <Development.Sydney@transport.nsw.gov.au>  
**Subject:** FW: Independent Audit - Widemere Recycling Facility Wetherill Park

You don't often get email from [robert.byrnes@iec.com.au](mailto:robert.byrnes@iec.com.au). [Learn why this is important](#)

**CAUTION:** This email is sent from an external source. Do not click any links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam

I have been engaged to undertake an independent audit of the Widemere Recycling Facility, Wetherill Park. The audit is a requirement of Condition D7 of State Significant Development approval SSD6525 which I have attached for your information. The audit scope will include compliance with the Development Consent and Environment Protection Licence conditions, an assessment of the environmental performance of the facility and a review of the adequacy of management strategies in place to maintain compliance. I would appreciate your advice on any issues of concern to Transport for NSW or other matters which you would like included or addressed as part of the audit. To achieve the required audit timeframe we would appreciate receiving your input by mid October. If you require any further information or clarification please do not hesitate to contact me.

Kind Regards

Robert Byrnes  
International Environmental Consultants  
"Longmead"  
700 Wombeyan Caves Road  
High Range NSW 2575  
Phone: 02 48785502  
Mobile: 0417437120



Virus-free. [www.avast.com](http://www.avast.com)

This email is intended only for the addressee and may contain confidential information. If you receive this email in error please delete it and any attachments and notify the sender immediately by reply email. Transport for NSW takes all care to ensure that attachments are free from viruses or other defects. Transport for NSW assume no liability for any loss, damage or other consequences which may arise from opening or using an attachment.

**Consider the environment. Please don't print this e-mail unless really necessary.**

Our ref: SSD-6525-PA-16

Lauren Sibigroth  
BORAL RECYCLING PTY LIMITED  
Triniti T2 39 Delhi Road  
North Ryde NSW 2113

12/09/2023

---

Sent via the Major Projects Portal only

Subject: Boral Widemere Recycling Facility - Independent Auditor Endorsement

Dear Ms Sibigroth

Reference is made to your post approval matter, SSD-6525-PA-16, request for the Planning Secretary's approval of a suitably qualified, experienced, and independent person to conduct an Independent Audit of the Boral Widemere Recycling Facility, submitted as required by Schedule D, Condition D7 of SSD-6525 as modified (the **consent**) to NSW Department of Planning and Environment (**NSW Planning**) on 7 September 2023.

NSW Planning has reviewed the independent auditor nomination and based on the information you have provided is satisfied that the proposed person is suitably qualified, experienced, and independent.

Consequently, as nominee of the Planning Secretary, I approve the appointment of Mr Robert Brynes from International Environmental Consultants Pty Ltd to prepare the Independent Auditor Report.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the endorsement of the above independent audit team for the project, each respective project approval or consent requires a request for endorsement of the independent auditor or audit team be submitted to NSW Planning, for consideration of the Planning Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact Maria Divis, Senior Compliance Officer on 02 8275 1156 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read "Julia Pope".

Julia Pope  
Team Leader Compliance - Metro  
Compliance

As nominee of the Planning Secretary



## Appendix E – Audit Certification

---

Development Name: Widemere Recycling Facility  
Development Consent: SSD 6525 issued by the Minister of Planning  
Development Description: Boral Recycling Widemere Recycling Facility  
Development Address: Widemere Road, Wetherill Park  
Operator: Boral Recycling Pty Ltd  
Operator Address: 39 Delhi Road, North Ryde NSW 2113  
Title of Audit: Independent Environmental Audit

I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:

- The audit has been undertaken in accordance with relevant approval condition(s) and in accordance with the auditing standard AS/NZS ISO 19011:2018 and Post Approval Guidelines – Independent Audits
- The findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;
- I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);
- Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.



Robert Byrnes  
Director  
International Environmental Consultants Pty Limited  
"Longmead"  
700 Wombeyan Caves Road  
High Range NSW 2575  
robert.byrnes@iec.com.au