

Prepared by SUEZ Recycling & Recovery Australia

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# Lucas Heights Resource Recovery Park

**SSD 6835 Independent Environmental Audit Action Plan**

April 2018



SUEZ Resource and Recovery

Lucas Heights Resource Recovery Park

SSD 6835 Independent Environmental Audit Action Plan

AECOM Australia undertook an Independent Environmental Audit of the Lucas Heights Resource Recovery Park (LHRRP) on the 22 and 23 of January 2018.

The site is operated by SUEZ and the below contains the actions to be taken, following the audit report.

Summary of Recommendations relating to management plans, site observations and previous IEA recommendations

SUEZ comment the summary:

**The OEMP is to be revised, updated and submitted to Southerland Shire Council (SSC) for consultation, by 30 Sep 2018. The below recommendations will be considered during the review.**

Source	#	Recommendations
Site observation	2018-IEA-REC01	Review oil storage requirements to enable drums to be stored without stacking and to ensure bunds have adequate capacity.
Site observation	2018-IEA-REC02	Investigate the stained soil around the underground waste oil pit next to the maintenance yard and clean up and dispose of affected soil to an appropriately licensed facility.
Site observation	2018-IEA-REC03	Ensure hoses are correctly stored when not in use to prevent drips / spills outside of the bunded area.
Site observation	2018-IEA-REC04	Ensure drains are inspected and cleaned regularly.
Site observation	2018-IEA-REC05	Ensure stockpiles of organics are maintained to be less than 4 m in height as per the GO Facility EMP.
Operational Environmental Management Plan	2018-IEA-REC06	<p>It is recommended that the OEMP is revised to consider the following:</p> <ol style="list-style-type: none"> <li>Update the OEMP to identify that the new GO Facility and ARRT Facility have not begun construction and that prior to their operation, the OEMP would be updated or a separate OEMP(s) prepared. The OEMP currently states that these OEMPs have been prepared.</li> <li>Update 'Section 1.6 Updates' to include a clear list of times and events which would trigger the OEMP to be updated. In particular, include reference to the contents of CoC D8 which includes a number of triggers for updating the OEMP and other strategies, plans and programs required under SSD 6835.</li> </ol>

Source	#	Recommendations
		<ol style="list-style-type: none"> <li data-bbox="483 284 1477 371">3. Figure 2.1 does not clearly show the surrounding land uses as described in Section 2.1.3. Consider updating this figure to show the location of surrounding land uses and sensitive receptors.</li> <li data-bbox="483 394 1517 607">4. Section 2.2 of the OEMP includes a significant amount of information on the site characteristics. This level of information is considered unnecessary for an EMP and makes the OEMP difficult to read and less focused on its main objectives. It is recommended that this section is summarised and pertinent information relating to the operation and environmental management controls be moved to Section 8 'Environmental Management'. Reference can be made to the EIS for further detailed information about the environmental characteristics of the area.</li> <li data-bbox="483 629 1497 714">5. Figure 2.2 Site Layout identifies that that OEMP applies to the renewable energy generating facility and not the PCYC. Clarification is required around what activities are and are not included in the OEMP.</li> <li data-bbox="483 736 1517 972">6. Section 5.1 of the OEMP includes the requirements under s.66 of the <i>Protection of the Environment Operations Act 1997</i> (POEO Act) to publish environmental monitoring data, required under the EPL, on the company website within 14 days. It is noted that the requirement in the OEMP incorrectly states "or made available on request". In accordance with s.66 (a) given SUEZ maintains a website that relates to the business or activity, the monitoring data must be made available on the website. The auditors noted that all monitoring data required by EPL 5065 was not available on the website at the time of the audit.</li> <li data-bbox="483 994 1497 1140">7. Information on community complaints and incident management is repeated in multiple sections throughout the OEMP (for example Sections 5.1, 6.3, 6.4, 6.5 and 7.13). It is recommended this information be consolidated into one section to remove duplication and opportunity for errors and improve the usability of the document.</li> <li data-bbox="483 1162 1501 1247">8. Review references to superseded regulations, guidelines, approvals and licences for example POEO Waste Regulations 2005 should be POEO Waste Regulations 2014.</li> <li data-bbox="483 1270 1497 1505">9. The OEMP includes detailed information on surface water, air quality and odour management and groundwater management. It is recommended that this information is removed from the main OEMP and instead include a reference to the Soil and Water Management Plan, GMP and Air Quality and Odour Management Plan. Referring to these plans would remove duplication and potential errors when information is updated or changed. It is noted that the Soil and Water Management Plan needs to be updated with the requirements of SSD 6835.</li> <li data-bbox="483 1527 1497 1762">10. Section 8.2 of the OEMP discusses surface water management. This section contains some details relating to the operation of the sediment dams however refers to the LHRRP EIS Surface Water Assessment (GHD 2015) for de-silting requirements. It would be more useful for this level of detail as well as other information such as pumping and discharge requirements, maintenance of freeboard, what to do before and during a rainfall event etc. to be included in the Soil and Water Management Plan or a specific Sediment Dam Procedure / Work Instruction.</li> <li data-bbox="483 1785 1501 1870">11. Section 9 Monitoring requires updating to ensure all the relevant monitoring points, analytes and frequencies listed in EPL 5065 (varied on 7 December 2017) are included.</li> <li data-bbox="483 1892 1485 1977">12. Following modification of DA 11-01-99, review the OEMP and remove or update any information which relates to information required under DA 11-01-99. For example, in Section 9.6.2.2 the OEMP discusses the requirement to have a</li> </ol>

Source	#	Recommendations
		<p>Groundwater Remediation Action Plan, which has been attached as Appendix O. This plan has been superseded by the GMP required under SSD 6835, Condition C35, therefore the OEMP should refer to attach the most recent plan.</p> <p>13. Section 9.10.1 and 9.11.1, monitoring points for landfill gas and noise, have not been completed.</p> <p>14. Combine Sections 9.5 'Meteorological monitoring' and 9.14 'Record of rainfall'.</p> <p>15. Conduct a review and update appendices documents as required. Refer to Table 7 in this audit report.</p> <p>16. Include a section within the OEMP that states that the OEMP has been prepared to address the requirements of SSD 6835, Condition D4, D5 and D7, and identify where in the plan each requirement has been addressed.</p> <p>17. Include a section which identifies which information will be made publically available on the SUEZ company website in accordance with SSD 6835, D15 and other regulatory requirements.</p> <p>18. Include the requirement to prepare an Annual Review in accordance with SSD 6835, Condition D9.</p> <p>19. Include a version control table in the front or back of the OEMP.</p> <p>20. Whilst the OEMP identifies that the Site holds separate EPLs for the GO Facility and PCYC, it does not include the requirements of these EPLs. It is noted that the GO Facility has a separate Environmental Management Plan. It is recommended that the OEMP include the requirements of the EPL 13114 (for the PCYC) to ensure the monitoring and reporting requirements of this area are not missed. In addition, the OEMP could cross-reference the GO Facility EMP.</p> <p>21. As identified in the 2015 IEA, the management of the TPA is not discussed in the OEMP (2015-IEA-OFI09). The ongoing maintenance and operational requirements from the TPA CEMP should be included in the OEMP.</p> <p>22. Attach the AQOMP and GMP as an appendix to the OEMP, as required under SSD 6835, Condition D5.</p>



Table 8-2 Summary of Conditions assessed as non-compliant or not verified

Title Number	Condition	Auditors Comments	Action Required	Date Required
SSD 6835, B8			Pending Landowner Consent	
SSD 6835, B11		<b>2018-IEA-REC07:</b> SUEZ should investigate if the integrity of the main leachate pond liner has been impacted by the whaling of the liner and repair it as required.	Quotes for assessment and repair have been requested from local supplier	Pending Quote.
SSD 6835, B12		A dilapidation report was not submitted to Council prior to the commencement of construction, this requirement has been assessed as an administrative non-compliance.	Consultation with council has commenced and the report was sent to Council 2 Feb 2018	Complete
SSD 6835, B18		<b>2018-IEA-REC09:</b> Ensure evidence of consultation is submitted to the DPE as part of the relevant documentation required by the conditions of consent. This should include details of any outstanding issues raised during the consultation and an explanation of the agreement reached.	Complete and ongoing, Ground Water Management Plan currently with the Department of Water for review.	On going
SSD 6835, C12		<b>2018-IEA-REC11:</b> Submit the final Odour Audit to SCC and EPA as per C12(b).	Was sent to SSC on 11 April 2018.	Complete
SSD 6835, C28		<b>2018-IEA-REC12:</b> Ensure the 2017 annual review includes a calibration of the leachate model included in the EIS.	GHD to calibrate Leachate modelling in June 2018, which is 12 months after approval for tipping at C5.3c.	31 July 2018
SSD 6835, C30		SUEZ reported non-conformance with limits in EPL 5065 in the Annual Return for the audit period (23.01.17 – 20.08.17):	Review sampling procedures to ensure representative samples are taken.	31 July 2018
SSD 6835, C35		<b>2018-IEA-REC13:</b> Submit the updated GMP to EPA, DPI Water and DPE.	Report was sent to DPI Water on 27 February 2018, awaiting their comments.	On going

Title Number	Condition	Auditors Comments	Action Required	Date Required
SSD 6835, C36		<b>2018-IEA-REC14:</b> Submit a modification to have this condition removed if the EPA and DPI Water agree that these bores are no longer necessary.	SUEZ to lodge consent modification.	31 July 2018
SSD 6835, C61		Administrative non-compliance		Complete.
SSD 6835, C63		<b>2018-IEA-OFI09:</b> Update the Evacuation Diagram within the ERP to include the entire site and detail alternative access / egress routes from the landfill and existing GO facility.	Agree	31 May 2018
SSD 6835, D1		<b>2018-IEA-REC16:</b> Make it clearer within the OEMP that it also incorporates the requirements of Condition D1 for a CEMP for the works associated with re-profiling, stripping and landfilling on top of existing waste and seek DPE approval of this approach.	The OEMP is to be revised, updated and submitted to Southerland Shire Council.	30 Sep 2018
SSD 6835, D3		<b>2018-IEA-REC17:</b> Seek a staged submission of the CEMP, required under Condition D1 and D2 to allow submission of the CEMP for the dual gas and leachate trench separately to the CEMP for the construction works.	Submitted to SSC 11 April 2018, following comment from SSC the CEMP Will be updated and sent to the Department of Planning	To be submitted to Department of Planning within 3 weeks of receipt of council comments
SSD 6835, D4		<b>2018-IEA-OFI10:</b> There is an opportunity for the OEMP to capture the requirements of the PCYC EPL to ensure the requirements of the EPL are not missed.	To be considered in response to D1 above.	30 Sep 2018
SSD 6835, D5		<b>2018-IEA-REC18:</b> Review the documents contained it the appendices of the OEMP and revise as required, including	To be considered in response to D1 above.	30 Sep 2018

Title Number	Condition	Auditors Comments	Action Required	Date Required
		attachment of the most recent plans under this condition, AQOMP and GMP.		
SSD 6835, D15		<b>2018-IEA-REC19:</b> Review the requirements of this condition and upload the required documentation to the SUEZ website.	CEMP has not been approved by the Department, all other documents can be uploaded.	31 July 2018 for the upload of approved documents.
EPL 5065, L1.1		Non-compliant	Refer C30 above.	As per C30 above
EPL 5065, L2.4		Non-compliant	Refer C30	As per C30 above
EPL 5065, M1.3		<b>2018-IEA-REC20:</b> Ensure all of the required information (e.g. time and name of person who collected the sample) is recorded for monitoring required by the EPL, in particular for wet weather sampling undertaken in house.	Agreed.	Complete
EPL 5065, M2.3		<b>2018-IEA-REC21:</b> Include failures to undertake monitoring in accordance with the frequency specified in the EPL within the Annual Return.	Sampling Regime to be reviewed by SUEZ and third party contractor.	31 July 2018

Title Number	Condition	Auditors Comments	Action Required	Date Required
EPL 5065, M8.1		<p><b>2018-IEA-REC23:</b> Submit quarterly surface and gas accumulation monitoring reports as an attachment to each Annual Return.</p> <p><b>2018-IEA-REC24:</b> Conduct surface gas monitoring every 3 months.</p> <p><b>2018-IEA-OPI16:</b> Publish all monitoring data required to be undertaken under EPL 5065 on the Lucas Heights LHRRP website within 14 days of receiving the results.</p>	<p>EPA Annual return is completed in line with EPA Requirements.</p> <p>Agreed.</p> <p>Agreed.</p>	<p>Annually.</p> <p>Quarterly.</p> <p>As required</p>
EPL 5065, M8.2		<p>As per condition M8.1</p> <p><b>2018-IEA-REC25:</b> Ensure all exceedances of methane levels are reported to the EPA with the required information.</p> <p><b>2018-IEA-OFI17:</b> Include exceedances of EPL limits in the incidents register, for example sub-surface gas methane levels to ensure that the EPA is notified and the appropriate actions are taken to control the exceedance.</p>	<p>Agreed</p> <p>Agreed</p>	<p>As Required</p> <p>As Required</p>
EPL 5065, R1.5		Administrative non-compliance	SUEZ Internal Management System (SIMS) will be updated to include notification sent 60 days before annual return is due.	21 Aug 18
EPL 5065, R2.2		Administrative non-compliance	Acknowledged	Complete
EPL 12520, A1.1		Non-compliant	Tonnages to be monitored.	Ongoing
EPL 12520, L2.1		Refer to EPL 12520 Condition A1.1	Tonnages to be monitored.	Ongoing



Title Number	Condition	Auditors Comments	Action Required	Date Required
EPL 12520, M1.3		<b>2018-IEA-REC26:</b> Include the name of the person who conducted the surface gas monitoring in the excel data sheets.	Agreed.	Ongoing
EPL 12520, M2.1/M2.2		<b>2018-IEA-OF118:</b> Include the definition of ' <i>Special Method</i> ' in the next licence variation of EPL 12520.	Agreed.	Ongoing
EPL 13114, L3.2		<b>2018-IEA-OF121:</b> <b>Incorporate noise monitoring requirements in EPL 13114 within the annual noise monitoring completed under SSD 6835</b>	Agreed	Update OEMP to reflect change 30 September 2018
EPL 13114, M2.1/M2.2		<b>2018-IEA-REC28:</b> Conduct surface water monitoring at Point 1 every 6 months for analytes required under EPL 13114, condition M2.2.	Sampling regime to be reviewed by SUEZ and third party contractor.	31 July

Table 8-3 Recommendations for Conditions considered compliant for improved compliance or continuous improvement

SUEZ comment on Table 8.3:

**The OEMP is to be revised, updated and submitted to Sutherland Shire Council (SSC) by 30 Sep 2018. The below opportunities will be considered during the review.**

Reference	#	Opportunity for Improvement
Air Quality and Odour Management Plan	2018-IEA-OFI01	Update Section 11 to include a reference to SSD 6835, Condition D8 which includes a number of triggers for updating the strategies, plans and programs required under SSD 6835.
Groundwater Management Plan	2018-IEA-OFI02	<ol style="list-style-type: none"> <li>Where the requirement to prepare the GMP is provided (Section 1.1) include reference to where in the GMP each requirement has been addressed.</li> <li>Include reference to the SSD 6835, Condition D8 which includes a number of triggers for updating the strategies, plans and programs required under SSD 6835.</li> </ol>
SSD 6835, C5	2018-IEA-OFI03	Add the requirement to maintain 300 mm cover to the Landfill Daily Checklist. Add confirmation box to record that it has been done. Include an electronic signature on checklists completed in soft-copy.
SSD 6835, C8	2018-IEA-OFI04	Consider changing the daily odour audit procedure to be undertaken at different times throughout the day
SSD 6835, C23	2018-IEA-OFI05	Include a revision table within the CEMP to identify who prepared the CEMP and that the EPA has reviewed and approved the plan.
SSD 6835, C31	2018-IEA-OFI06	Update the GO OEMP to include discussion of the discharge or disposal of green waste liquor from the green waste dam and the requirement that it be transported off-site and disposed of lawfully or discharged to sewer in accordance with a Trade Waste Agreement.
SSD 6835, C37	2018-IEA-OFI07	Management of chemicals, fuels and oils at the workshop is not currently detailed in the OEMP. SUEZ should update the OEMP to include a description of the workshop area, Select Civils role and responsibilities and overview of works undertaken and controls implemented.
SSD 6835, C57	2018-IEA-OFI08	Check that the weekly checklist includes inspecting the TPA for litter and stormwater infrastructure and update if required.
SSD 6835, C63	2018-IEA-OFI09	Update the Evacuation Diagram within the ERP to include the entire site and detail alternative access / egress routes from the landfill and existing GO facility.
SSD 6835, D4	2018-IEA-OFI10	There is an opportunity for the OEMP to capture the requirements of the PCYC EPL to ensure the requirements of the EPL are not missed.
SSD 6835, D14	2018-IEA-OFI11	Ensure the Appendices to the Meeting Minutes (which includes the environmental update) are uploaded to the SUEZ website.

Reference	#	Opportunity for Improvement
EPL 5065, P1.1	2018-IEA-OFI12	Update the OEMP to include the most recent variation to EPL 5065.
EPL 5065, O5.3	2018-IEA-OFI13	Encourage whenever possible for the public to separate recyclables from the general waste stream and dispose of recyclable materials in the appropriate area at the public drop-off.
EPL 5065, O5.7	2018-IEA-OFI14	Revise the OEMP to specifically refer to the application of VENM as daily and intermediate cover
EPL 5065, O5.13	2018-IEA-OFI15	Consult with the EPA on the relevance of this Condition and potentially remove or amend to refer to a more recent SUEZ document.
EPL 5065, M8.1	2018-IEA-OFI16	Publish all monitoring data required to be undertaken under EPL 5065 on the Lucas Heights LHRRP website within 14 days of receiving the results.
EPL 5065, M8.2	2018-IEA-OFI17	Include exceedances of EPL limits in the incidents register, for example sub-surface gas methane levels to ensure that the EPA is notified and the appropriate actions are taken to control the exceedance.
EPL 12520, M2.1 / M2.2	2018-IEA-OFI18	Include the definition of 'Special Method in the next licence variation of EPL 12520.
EPL 12520, E1.1	2018-IEA-OFI19	Update the GO EMP to include fire prevention measures and fire-fighting procedures as required by the EPA Environmental Guidelines: Composting and Related Organics Processing Facilities Guidelines (July 2004) and also to reference the requirements of the Pasteurised Garden Organics Order 2016.
EPL 13114, O3.1	2018-IEA-OFI20	Include measures to minimise the emission of dust from the PCYC minibike club in the OEMP
Appendix B 2015 IEA	2018-IEA-OFI21	Incorporate noise monitoring requirements in EPL 13114 within the annual noise monitoring completed under SSD 6835.



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