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2020 Annual Environmental Management Report



Tharbogang Waste Management Centre

Annual Environmental Management Report 2020

Prepared for: Griffith City Council

7 June 2021

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PROJECT ADDRESS	Hillside Drive, Tharbogang, NSW		
PREPARED FOR	Griffith City Council		
AUTHOR/S	Tammy Paartalu		
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ECOPLANNING PTY LTD
74 HUTTON AVE BULLI NSW 2516
M: 0497 888 225
www.ecoplanning.com.au

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Glossary and Acronyms


Acronym	Description
AEMR	Annual Environmental Management Report
AQMP	Air Quality Monitoring Plan
ARI	Average Recurrence Interval
AUR	Auxiliary Right Turn
BOA	Biodiversity Offset Area
C&D	Construction and Demolition Waste
C&I	Commercial and Industry Waste
DoP	NSW Department of Planning
DPE	NSW Department of Planning and Environment
EA	Environmental Assessment (Balance 2009)
EPA	Environmental Protection Agency
EPL	Environmental Protection Licence (version 9-Dec-2015)
GHG	Greenhouse Gas
ha	hectare(s)
km	kilometre
LEMP	Landfill and Environmental Management Plan
LGA	Local Government Area
masl	Metres above sea level
OP	Operation Plan
MSW	Municipal Waste
NSW	New South Wales
PA	Project Approval
PIRMP	Pollution Incident Response Management Plan (Griffith City Council 2008)
POEO Act	NSW <i>Protection of the Environment Operations Act 1997</i>
SSTV	Site Specific Trigger Values
SWLMP	A Soil, Water and Leachate Management Plan
TWMC	Tharbogang Waste Management Centre

1. Introduction

This Annual Environmental Management Report (AEMR) has been prepared as a condition of Project Approval (PA) relating to the proposed extension of the Tharbogang Waste Management Centre (TWMC) (Lots 201 and 202 // DP 756035), Hillside Drive, Griffith, NSW, 2680. Tharbogang Waste Management Centre is owned and operated by Griffith City Council and is located approximately 10 km north-east of Griffith, NSW (**Figure 1.1**). A summary of the site details is included below in **Table 1.1**.

Table 1.1: Site summary

Name of operation	Tharbogang Quarry and Landfill		
Name of operator	Griffith City Council		
Development consent / project approval	Project approval: MP_06_0334, 2010 Environmental Protection Licence No: 5875 (EPL)		
Name of holder of development consent / project approval	Griffith City Council		
Mining lease #	Lots 201 and 202 // DP 756035		
Name of holder of mining lease	Griffith City Council		
Water licence #	NA		
Name of holder of water licence	NA		
Operation Plan commencement date	31/12/1997	Operation Plan completion date	TBA
AEMR commencement date	1 January 2020	AEMR end date	31 December 2020
Name of landowner and operator	Griffith City Council		
Site contact	John Roser – Waste Operations Manager		
	<p>I, John Roser, certify that this audit report is a true and accurate record of the compliance status of Tharbogang Waste Management Facility for the period 1 January 2020 – 31 December 2020 and that I am authorised to make this statement on behalf of Griffith City Council.</p> <p><i>Note.</i></p> <p><i>a) The Annual Review is an 'environmental audit' for the purposes of section 122B(2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or</i></p>		

	<p><i>misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p><i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>
Name of authorised reporting officer	John Roser
Title of authorised reporting officer	Waste Operations Manager
Signature of authorised reporting officer	
Date	7 June 2021

This AEMR provides a summary of activity, environmental performance, compliance and community relations between the period of 1 January 2020 to 31 December 2020. The AEMR includes the following:

- Description of the works completed in 2020,
- Review, summary and analysis of environmental monitoring results that were carried out in 2020,
- Analysis of trends,
- Identification of non-compliance and assessment of measures undertaken to ensure compliance, and
- Summary of complaints received during the assessed period.

Ministerial approval was received for the expansion, as well as the landfilling and quarrying operations in July 2010.

The initial PA has undergone two modifications. Modification 1 allowed for the use of Lots 181 and 182, Deposited Plan (DP) 756035 to the immediate east of the site and was approved on 9 May 2012 (Risk Property Australia 2018). As part of Modification 1 the offset value for the TWMC was also re-negotiated.

Modification 2 included an increased extraction volume from the existing quarry; changes to the extraction sequence for quarry pits 101 and 103; and the location of a new Green Waste Stockpile site on a capped part of former asbestos disposal site, in the north-east corner of Lot 202 DP 756035. This modification was approved on 22 July 2014 (Risk Property Australia 2018). A new filling sequence for the new landfill development was also approved as part of this modification.

The PA requires an updated Environmental Protection Licence (EPL) from the Environmental Protection Agency (EPA).

Under the PA, there is approval to operate in the new approved sites until 31 December 2035. Within a calendar year the site must not extract more than 315,000 tonnes per year of gravel materials, or, receive more than 35,000 tonnes of general solid waste.

The existing landfill and quarry are within a natural depression in the centre of the site. The current site footprint is approximately 120 Most of the site is vegetated with a sparse cover of native trees and grasses, with weeds and regrowth dominating areas which have been previously cleared. Previously, a speedway (Blue-dot speedway) was in the south eastern section of the site but was closed in 2010.

There are five permanent residences located within 1.5 km of the western boundary of the site. The surrounding areas are primarily rural/agricultural comprising pastoral grasslands and orchards.

1.1 Regulatory framework

Project Approval for the expansion of the site was granted by the Minister for Planning (MP_06_0334) on 8 July 2010. The expansion includes landfilling of the existing quarry, two additional quarry pits (pit 103 and pit 101), two additional leachate ponds, a waste transfer station, a stormwater detention pond and minor works (**Figure 1.2**). The use of Lots 181 and 182 (DP 756035) as a Biodiversity Offset Area was approved on 9 May 2018.

This AEMR has been prepared to meet with Schedule 5, Condition 4 of the Project Approval (PA):

'Within 12 months of the date of this approval, and annually thereafter, the Proponent shall submit an AEMR to the Director-general and relevant agencies. This report must:

- a) *Identify the standards and performance measures that apply to the project;*
- b) *Describe the works carried out in the last 12 months and the works that will be carried out in the next 12 months;*
- c) *Include a summary of the complaints received during the past year, and compare this to the complaints received in previous years;*
- d) *Include a summary of the monitoring results for the project during the past year;*
- e) *Include an analysis of these monitoring results against the relevant:*
 - a. *Impact assessment criteria/limits;*
 - b. *Monitoring results from previous years; and*
 - c. *Predictions in the EA;*
- f) *Identify any trends in the monitoring results over the life of the projects;*
- g) *Identify any non-compliance during the previous year; and*
- h) *Describe what actions were, or are being, taken to ensure compliance.'*

1.1.1 Project Approval

The compliance requirements that are associated with the PA are summarised in **Table 1.2**. The table provides references to the relevant section of this AEMR which contains an assessment of the relevant criteria, monitoring results and a compliance assessment.

Table 1.2: Project Approval conditions summary (Application No: 06_0334)

Compliance Condition	Project Approval Compliance Requirement (06_0334)	Section of AEMR
Schedule 2: Administrative Conditions		
7	Quarrying and landfilling may be undertaken until 31 December 2035.	4.1
8	No more than 315,000 tonnes per year of gravel materials shall be extracted, and no more than 35,000 tonnes per year of general solid waste be received.	4.1 and 4.2
12	All plant equipment shall be maintained and operated in a proper and efficient condition / manner.	4.1
Schedule 3: Specific Environmental Conditions		
1	Only waste authorised by the EPL shall be received by the site.	4.2
2	All waste outputs should be disposed of at a suitably licenced facility.	4.2
3	All waste generated during construction must be classified and disposed of according to DECCW's <i>Waste Classification Guidelines, Part 1: Classifying waste</i> .	4.2
4	Suitable procedures are in place to ensure that the site does not accept prohibited waste, incoming waste loads are screened, appropriate documentation of all waste sludges and wastes that are controlled under a tracking system and adequate training to recognise and handle hazardous or unapproved waste.	4.2
6	A waste monitoring program must be prepared to the satisfaction of the DG and implemented prior to commencement of operations.	4.2
7	Prescribes landfill criteria including revegetation and systematic filling and management of landfill cells.	4.3
8	The site surrounding the landfill must be kept secure and locked when unattended.	4.1 and 4.18
9	Existing litter shall be removed, mesh fencing 1.8 m high shall be installed around the site and the site will be inspected daily with a minimum of a weekly litter removal.	4.1 and 4.14
10	Pests, vermin and noxious weeds (now priority weeds under the <i>Biosecurity Act 2015</i>) on site are managed and inspected regularly.	4.4
11	Composting is undertaken in accordance with <i>Australian Standard AS 4454-2003</i> .	4.13
12	A feasibility report outlining options to capture and use greenhouse gas in the generation of electricity is to be prepared within 5 years of PA.	4.13
13	The existing Landfill Environmental Management Plan is updated within 6 months of the PA.	4.3

Compliance Condition	Project Approval Compliance Requirement (06_0334)	Section of AEMR
14	When discharging, the Proponent will comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> (POEO Act) unless expressly provided for by an EPL.	4.5
15	Stormwater will be controlled and diverted through appropriate erosion and sediment control/pollution measures.	4.5
16	On site sewerage shall be managed and comply with the <i>Environment and Health Protection Guidelines – On-site Sewage Management for Single Households (1998)</i> .	4.5
17	Water that has come in contact with waste must not be discharged from the site.	4.5
18	Prescribes leachate management criteria.	4.7
19	All above ground tanks and vats are to be stored and handled in accordance with the relevant criteria.	4.17
20 to 26	A Soil, Water and Leachate Management Plan must be prepared and implemented which must include a site water balance, erosion and sediment control plan, stormwater management scheme, surface water monitoring program, ground water and leachate monitoring program and surface water, groundwater and leachate response plan. SWLMP to be provided to DG for approval within 6 months of PA.	4.5, 4.6 and 4.7
27	A meteorological station must be established and maintained in the vicinity of the development in accordance with the <i>Approved Methods for Sampling Air Pollutants in NSW</i> guideline	4.8
28	Prescribes maximum noise limits.	4.9
29	Prescribes quarrying and landfilling operating hours.	4.1
30 and 31	Prescribes blasting criteria, airblast overpressure limits and ground vibration thresholds.	4.10
32 and 33	Prescribes blasting hours and frequency	4.10
34	Requires that blasting is not undertaken within 200 m of privately-owned land unless suitable arrangements have been made	4.10
35 and 36	Requires that all landholders within 500 m are advised of proposed blasting activities and prior to 30 November 2010 these owners are entitled to a property inspection. In the event that a written request of a property inspection, the inspection shall be undertaken by a suitably qualified person.	4.10
37	Prescribes the investigation process following landholder claims of property damage as a result of blasting.	4.10
38	A Blast Management Plan must be prepared and implemented prior to 30 November 2010.	4.10

Compliance Condition	Project Approval Compliance Requirement (06_0334)	Section of AEMR
39	Prescribes continuous improvement criteria of blasting and noise impacts.	4.9 and 4.10
40	A Noise and Vibration Monitoring Plan must be prepared and implemented. This will include annual attended noise monitoring, traffic noise monitoring, details of how noise performance is monitored and a noise monitoring protocol.	4.9 and 4.16
41	Tables 5, 6 and 7 prescribe Air Quality criteria not to be exceeded.	4.11 and 0
42	Requires that odour complies with section 129 of the <i>POEO Act</i> unless expressly provided in the EPL.	0
43	An Air Quality Monitoring Plan must be prepared and implemented. The plan will include details of how air quality performance will be monitored and a protocol for evaluating compliance.	4.11 and 0
44	Requires continuous improvement of dust mitigation measures.	4.11
45	Table 8 prescribes Biodiversity Offset Requirements	4.4
46 and 47	Requires a revision of the Biodiversity Offset Strategy and that the strategy be implemented prior to any clearing on site.	4.4
48	A Landscape and Biodiversity Management Plan must be prepared and implemented. This must be prepared by a qualified person, be submitted to the Director-General and include a Rehabilitation and Biodiversity Offset Strategy Management Plan and a Long Term Management Strategy.	4.4 and 4.14
49 and 50	Prescribes Landscape and Biodiversity Management Plan criteria and Long-Term Management Strategy criteria	4.14
51 and 52	Prescribes criteria for the rehabilitation bond.	4.14
53	A Cultural Heritage Management Plan must be prepared and implemented and prescribes criteria for the plan. This plan must be prepared in consultation with DECCW and local Aboriginal communities, draw on relevant recommendations for management and include description of measures that would be implemented.	4.15
54	A Traffic Management Plan must be prepared and implemented and prescribes criteria for the plan. This plan must be prepared in consultation with RTA, outline measures to manage traffic issues, review standard of access roads, outline dust mitigation measures and outline rubbish management from vehicles.	4.16
55	Requires that the Auxiliary Right Turn (AUR) at the intersection of Access Road and the Kidman Way be upgraded within 12 months of operations commencing on site.	4.16
57	All loaded vehicles must be covered when travelling to and from the site and that loaded vehicles are cleaned of material when leaving the site.	4.16

Compliance Condition	Project Approval Compliance Requirement (06_0334)	Section of AEMR
58	A logbook of the extraction quantities and traffic movements must be kept on site and available for inspection.	4.16
59	Storage, handling and transport of fuels and dangerous goods is to be conducted in accordance with the relevant Australian standards.	4.17
60 (b)	Prescribes fire management criteria.	4.18
61	Prescribes criteria for recording of annual production data and the inclusion of this data in the AEMR.	4.1
Schedule 4: Additional Procedures		
1	Requires that the Director General and affected landowners and tenants are notified if the monitoring in Schedule 3 identifies the impacts generated are greater than the relevant criteria. Quarterly monitoring results shall be provided to each of these parties until results indication that the project is complying with the relevant criteria.	4.18
2-5	Prescribes the criteria for an independent review.	NA
Schedule 5: Environmental Management, Reporting and Auditing		
1	<p>An Environmental Management Strategy must be prepared and implemented. This strategy must provide strategic framework, identify statutory approvals that apply to the project, describe the role of key personnel involved in the management, describe the procedures to:</p> <ul style="list-style-type: none"> • Keep local community and relevant agencies informed about the operation and environmental performance, • Receive, hand, respond to and record complaints • Resolve any disputes that may arise during the course of the project, • Respond to any non-compliance, and • Respond to emergencies <p>Additionally, copies of the strategies, plans and programs must be included in the strategy and a clear plan depicting all monitoring being carried out within the project area.</p>	Not addressed
2	Within 24 hours of an exceedance of the limits/performance criteria in this PA or the occurrence of an incident that causes or may cause material harm to the environment the Department of Planning and other relevant agencies of the exceedance/incident must be notified.	4.18
3	A written report must be provided to the Department of Planning and other relevant agencies of an exceedance/incident within 6 days of the incident. The report must describe the date, time and nature of exceedance/incident, identify the cause, describe what action has been taken and proposed measures.	4.18
4	Prescribes criteria for the AEMR.	This report

Compliance Condition	Project Approval Compliance Requirement (06_0334)	Section of AEMR
5-7	Prescribes criteria for the independent environmental audit.	NA
8	Within one month of approval of strategies/plans/programs or the completion of audits or AEMR, copies of the relevant documents must be provided to the relevant agencies and that copies are made publicly available on its website and at the site.	4.1
9	During the project the proponent must make a summary of monitoring results required under this approval publicly available on its website and update these results on a regular basis	4.1
10	A community education program must be prepared and implemented. This program should focus on promoting resource recovery activities, community benefits of composting food and garden waste and the importance of food waste recovery.	3.3

1.1.2 NSW EPA Environmental Protection Licence

All operations are regulated under the *Environmental Protection Licence No. 5875* (EPL) (2015), which has been summarised in **Table 1.3**. The EPL has been issued for all extractive scheduled activities. The most recent licence variation occurred on 9 December 2020. An application to amend the requirements of O.14 and O.15 was approved by the EPA given the difficulty in sourcing clean fill material to provide daily cover to the landfill waste area. These conditions have been amended accordingly below.

Table 1.3: Environmental Protection Licence (EPL no. 5875) compliance conditions.

Compliance Condition	EPL Compliance Requirement (No. 5875)	Section of AEMR
Condition P1.1 and 1.2	Groundwater Quality Monitoring (EPA points 1, 3-7) Surface Water Quality Monitoring (EPA point 8) Leachate Runoff (EPA point 9)	4.5, 4.6 and 4.7
Condition L1.1	Requirement to comply with section 120 of the POEO Act – prohibition of the pollution of waters.	4.5
L2.1	Lists the type of waste permitted to be received at the TWMC	4.2
L2.2	The total tonnage of waste disposal must not exceed 100,000 tonnes per year.	4.2
L2.3 and L2.4	Prescribes criteria for the disposal and storage of tyres.	4.2
L3.1 and L3.2	Prescribes noise limits.	4.9
L4	Prescribes blasting criteria.	4.10
L5	Prescribes hours of operation.	4.1

Compliance Condition	EPL Compliance Requirement (No. 5875)	Section of AEMR
O1, O2 and O3	Activities must be undertaken in competent manner (O1), plant and equipment must be maintained and operated in a proper and efficient manner (O2) and activities must be undertaken in a manner which minimises dust emission (O3).	4.1 and 4.11
O4	Outlines the emergency response procedures for fires.	4.18
O5.1	Sedimentation basin and leachate holding pond must be maintained to ensure their design capacity is available for stormwater and leachate.	4.5 and 4.7
O5.2	Perimeter of areas where waste has been landfilled must be contoured to prevent stormwater running onto these surfaces from all storm events less than or equal to a 1 in 10 year, 24 hour duration storm event.	4.5
O5.3 -O5.7	Outlines the measures to be implemented to prevent unauthorised entry.	4.1
O5.8	Requires that the litter management program specified in the LEMP be implemented.	4.14
O5.9	Requires that pests, vermin and weeds be controlled.	4.4
O5.10	Outlines staff training requirements	4.1
O6.1 – O6.5	Outlines leachate management and disposal requirements	4.7
O6.6, O6.7 and O6.8	Outlines waste screening and compaction requirements.	4.2
O6.9	Waste disposal must follow the filling plan.	4.3
O6.10 and O6.11	Prescribes requirements for completion of landfill cells.	4.3
O6.12	Requirements for closure plan.	4.14
O6.13	Prescribes criteria for burning of waste.	4.2
O6.14 and O6.15	Prescribes criteria for covering of waste.	4.3
O6.16 and O6.17	Biosolids and green waste must be stored on an impermeable pad with a bunded area capable of capturing all leachate in accordance with the EPL performance conditions.	4.2
M1	Includes criteria for the recording of monitoring data.	4.1
M2	Prescribes requirements to monitor the concentration of pollutants to be discharged.	4.5
M3	Monitoring of concentration of a pollutant discharged must be undertaken in accordance with the Approved Methods Publication unless alternative methods has been approved.	4.5 and 4.6

Compliance Condition	EPL Compliance Requirement (No. 5875)	Section of AEMR
M4 and M5	Prescribes pollution complaint criteria and telephone complaint criteria.	3
M6.1	Remaining disposal capacity of landfill must be monitored.	4.3
R1	Outlines the annual returns document requirements.	4.18
R2	EPA must be notified of incidents of environmental harm.	4.18
R3	A written report must be produced if requested regarding and event (caused, causing or is likely to cause material harm to the environment).	-
R4.1 – R4.2	Criteria for recording fires	4.18
R4.3	The annual report for TWMC must be prepared and submitted within 6 weeks after the end of licence year.	-

All assessments are in relation to the PA, EPL and Environmental Assessment (EA) guidelines. The landfills environmental goals are listed in *Environmental Guidelines: Solid Waste Landfills* (EPA 2016) and have been reviewed for landfill operations.

1.1.3 Environmental Assessment mitigation and management commitments

The PA indicates that *the statement of commitments contained in Section 9 of the EA (Balance 2009) have been updated and amended to reflect the revised project description and to take into account submissions received during the EA. Appendix 2 of the PA supersedes and replaces Section 9 of the EA.* The revised commitments are included in **Appendix A**.

The PA states that the predictions in the EA (Balance 2009) need to be compared against the monitoring results.

1.1.4 Actions required from previous AEMR

The 2020 AMER is the third report with the following identified in the 2019 AMER for action:

Conditions requiring the development and implementation of a community education program and an indication of landholder consultation were not assessed in the 2019 AEMR due to insufficient information provided during the reporting period. Further clarification was needed to determine if these requirements have been met.

Development and implementation of a community education program was undertaken in 2020 and a Waste Education Plan WEP (GCC 2020d) prepared and approved. However, the education program was not approved by the DG, it was arranged through the RAMJO Waste Group (Riverina & Murray Organisation of Councils).

A compliance assessment found that the TWMC had a moderate level of compliance with the PA and EPL conditions and EA revised statement of commitments and that compliance has been increasing of the life of the AEMR's. There was an overall improvement in compliance in the 2019 AEMR and this trend has continued for the 2020 AEMR. Several compliances were unable to be adequately assessed due to insufficient information and 28 non-compliances were

identified across each of the fields. Notably, there is large amount of information is still required to assess compliance for incident management and response.

Compliance was recorded for the following categories although some had conditions for which insufficient information was available to adequately assess compliance and / or conditions that were not yet triggered:

- Meteorological
- Blasting
- Air quality (Dust)
- Odour
- Rehabilitation and Land Management
- Heritage
- Dangerous goods and hazardous materials
- Monitoring and recording conditions
-

There is an absence of the following information and / or monitoring data (this list is not exhaustive and the compliance table in each section on the 2019 report should be referred to):

- Odour monitoring data
- Annual production data using the standard form (this needs to be in this AEMR)
- No information regarding a community education and consultation with landholders
- No indication of the remaining disposal capacity of the landfill has been provided for this reporting period
- No information available regarding inductions, refresher training and some logbooks
- No information regarding landfill cells engineering design other than that they will be constructed to engineering details and surface water and leachate managed as per the PA conditions
- Information regarding the revegetation of Lot 201 and the 40 m riparian zone either side of the ephemeral drainage line has not been provided. Nor regarding the retention of hollow trees and woody debris
- No information regarding vegetation enhancement in areas not designated for clearing
- No information regarding a rehabilitation bond has been provided - *Council has a Waste Reserve which is cash backed, which will cover any rehabilitation works required. Council is currently consulting with the EPA regarding the Post Closure and Rehabilitation Plan.*
- No information regarding batters with fissures and benches, contaminated soil disposal, soil testing, mulching and edge vegetation.
- No information regarding quarry void rehabilitation works.
- No indication of what dangerous goods are present on site has been provided for this reporting period
- It is not possible to assess whether the 2018-2019 Annual returns report addresses all of the criteria listed in R1
- There are a number of areas in 'incident management and response' where there is insufficient information provided to determine compliance

Non-compliance was recorded for the following categories (see **Table 1.5**):

- Operations
- Waste
- Landfilling
- Biodiversity
- Surface water
- Groundwater
- Leachate
- Greenhouse gas emissions
- Traffic and transport
- Incident management and response

The NGH report noted that while the recorded noise levels at each of the sensitive receivers ($L_{Aeq}(15 \text{ min})$) exceeded the assessment criteria of 35 dB(A) $L_{Aeq}(15 \text{ min})$, it was likely that this was due to a range of noise sources at the sensitive receiver sites. As such it is likely that noise from the quarry was not consistently the main contributor to noise at any of the sensitive receiver locations (NGH Environmental 2019).

The EPA audit (2019) also noted a number of non-compliance as outlined below in **Table 1.6**. Compliance colours used in **Table 1.5** are consistent with those outlined in the document *Post-approval requirements for State significant mining developments – Annual Review Guideline* (NSW Government 2015). Any tasks that are now compliant are indicated in 'green' in **Table 1.5**.

Table 1.4: Compliance status key (taken from NSW Government 2015).

Risk level	Colour code	Description
High	Non-compliant	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence
Medium	Non-compliant	Non-compliance with: <ul style="list-style-type: none"> • potential for serious environmental consequences, but is unlikely to occur; or • potential for moderate environmental consequences, but is likely to occur
Low	Non-compliant	Non-compliance with: <ul style="list-style-type: none"> • potential for moderate environmental consequences, but is unlikely to occur; or • potential for low environmental consequences, but is likely to occur
Administrative non-compliance	Non-compliant	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions)

Table 1.5: Non-compliances from previous AEMR

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
Requested by Project Approval #06_0334							
Waste							
#06_0334	Condition 4, Schedule 3	Procedures in place to ensure that the site does not accept prohibited waste. Documentation kept of waste and staff to receive adequate training to recognise and handle hazardous or unapproved waste.	Compliant	<p>No information regarding prohibited waste, documentation of waste or training of staff is provided.</p> <p>However, two large signs are installed at the weighbridge one of which outlines what can be dumped at the TWMC and the Waste Screening Procedures document outlines measures to screen waste loads within the weighbridge and WTS.</p> <p>The EPA annual return states that waste loads are checked at the weighbridge and the waste category determined by the weighbridge operator.</p>	Section 4.2.3	<p>Two large signs are installed at the weighbridge one of which outlines what can be dumped at the TWMC and the Waste Screening Procedures document outlines measures to screen waste loads within the weighbridge and WTS.</p> <p>Council has advised that all staff have undergone the following training:</p> <ul style="list-style-type: none"> • Asbestos • DrumMuster • Community Recycling Centre <p>These all assist with identifying waste or products that are not allowed to be disposed of on site. Evidence of the training is in the Waste Department WHS records provided by Council.</p>	Completed and now compliant

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
Landfilling							
#06_0334	Condition 7, Schedule 3	Lists the site manger responsibilities in term of the exposed tip face, revegetation, capping, filling the landfill cells and the incident response register.	Compliant	Waste is not covered at the end of the day. Management is looking for other compliant methods to cover waste at the end of the day. On the 18 of July 2019 Council was instructed by the EPA to provide a concept design for further comment. This is currently underway. The approved Closure/Rehabilitation Plan has been approved covers the works required for revegetation of the site.	Section 4.3.3	The Closure/Rehabilitation Plan has been approved and covers the works required for revegetation of the site.	Ongoing
#06_0334	Condition 11, Schedule 3	Composting should be undertaken in accordance with AS 4454-2003	Non-compliant	Composting does not occur on the site. All green waste is mulched and stockpiled north of the asbestos landfill area for cover use.	Section 4.3.3	Composting is not proposed.	NA
Greenhouse Gas Emissions							

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
#06_0334	Condition 11, Schedule 3	Composting required on site.	Non-compliant	Council has advised that composting will not occur on site.	Section 4.13.3	Composting is not proposed.	NA
#06_0334	Condition 12, Schedule 3	A feasibility report is required to be prepared for within 5 years of the Planning Approval	Non-compliant	No feasibility report has been provided.	Section 4.13.3	Feasibility report to be completed.	TBC
Rehabilitation and Landscape Management							
#06_0334	Condition 9, Schedule 3	Specific requirements for the visual amenity and litter control within 6 months of the date of project approval.	Non-compliant	Litter has been removed, no information regarding a 1.8 m high fence is provided, no indication of daily inspections or weekly litter removal.	Section 4.14.2	There is no 1.8m high mesh fence around the active tipping area. Due to the fluid nature of the active tipping area Council uses litter fences as these are mobile and are able to be relocated when the active tipping area changes (GCC 2020c).	NA
Requested by EPL							
Operations							
#5875	O2	Equipment maintenance	Compliant	The EPA audit states that some plant and equipment was not maintained in a	Section 4.1.3	New diesel counter installing including bollards	Completed 2019 and ongoing

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
				proper and efficient condition and was not operated in a proper and efficient manner.		Diesel tank sign posted. 10 yearly portable fuel station inspection undertaken (B&B Industrial 2019).	
#5875	O5.5	Measures must be implemented to prevent unauthorised entry	Non-compliant	The licensee has not installed and maintained a high wire mesh of less than 1.8 metres around the active tipping face.	Section 4.1.3	There is no 1.8m high mesh fence around the active tipping area. Due to the fluid nature of the active tipping area Council uses litter fences as these are mobile and are able to be relocated when the active tipping area changes (GCC 2020c).	NA
Waste							
#5875	O6.6 and O6.13 – O6.15	Criteria for the screening, disposal, burning and covering of waste (O6.6, O6.7, O6.8, O6.9, O6.13 – O6.15).	Non-compliant	The EPA annual return report states that burning of green waste has not occurred for some time and is used for mulch. Green waste is eventually shredded and	Section 4.2.3	TWMF state in the Annual Return (2020) that due to a lack of cover material, operationally it is difficult to meet this license requirement and that they are looking into a mechanical solution (landfill lids/tarps). The active cell is	Ongoing The design of the Biosolids pad is currently being undertaken (GCC 2020c).

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
				<p>stockpiled north of the asbestos landfill area.</p> <p>The EPA audit (2019) states:</p> <ul style="list-style-type: none"> the stockpile is greater than 20 m diameter neither the green waste nor the biosolids are stored on an impermeable bunded area. full area of waste is not covered daily, but is compacted at the end of each day the licensee was not applying cover material over all exposed landfilled waste prior to ceasing operations at the end of each day. 		<p>compacted each day which alleviates wind blow rubbish.</p> <p>The full landfill area is not covered daily, is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m². The system still appears to meet the goals of preventing fires in the waste, controlling vermin and achieving good compaction (GCC 2020c).</p> <p>The green waste pad has been completed and includes a bunded area capable of capturing all leachate in accordance with the EPL performance conditions.</p> <p>The Green waste pad construction was concluded on the 24/2/20 and has been</p>	

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
						<p>in use ever since (GCC 2020c).</p> <p>The majority of Biosolids are disposed of into landfill.</p> <p>Biosolids, if not disposed directly to landfill, is stockpiled in an area specifically isolated to allow the material to dry. These pits are eventually covered when the pit is both dry and full to capacity.</p> <p>The design of the Biosolids pad is currently being undertaken (GCC 2020c).</p>	
#5875	O6.16 – O6.17	Green waste and biosolids are stored on an impermeable bunded area	Non-compliant	<p>The majority of Biosolids are disposed of into landfill.</p> <p>Biosolids, if not disposed directly to landfill, is stockpiled in an area specifically isolated to allow the material to dry. These pits are eventually covered</p>	Section 4.2.3	<p>The green waste pad has been completed and includes a bunded area capable of capturing all leachate in accordance with the EPL performance conditions.</p> <p>The Green waste pad construction was concluded on the 24/2/20 and has been</p>	<p>The design of the Biosolids pad is currently being undertaken (GCC 2020c).</p>

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
				<p>when the pit is both dry and full to capacity.</p> <p>The EPA audit (2019) states that neither the green waste nor the biosolids are stored on an impermeable bunded area. The green waste and biosolids waste pads must be impermeable to that required and have a thickness of not less than 600mm.</p>		<p>in use ever since (GCC 2020c).</p> <p>The majority of Biosolids are disposed of into landfill.</p> <p>Biosolids, if not disposed directly to landfill, is stockpiled in an area specifically isolated to allow the material to dry. These pits are eventually covered when the pit is both dry and full to capacity.</p>	
Landfilling							
#5875	O6.14 and O6.15	Cover exposed landfill prior to ceasing operations each day.	Non-compliant	The EPA audit (2019) states that the licensee was not applying cover material over all exposed landfilled waste prior to ceasing operations at the end of each day.	Section 4.3.3	TWMF state in the Annual Return (2020) that due to a lack of cover material, operationally it is difficult to meet this license requirement and that they are looking into a mechanical solution (landfill lids/tarps). The active cell is compacted each day which alleviates wind blow rubbish.	On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
						The full landfill area is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m ² . The system still appears to meet the goals of preventing fires in the waste, controlling vermin and achieving good compaction (GCC 2020c).	
Leachate							
#5875	O6.2	Leachate collection system	Non-compliant	Storage dams are designed to cater for a 1 in 100 year, 72 hour storm event.	Section 4.7.3	<p>The leachate capture system has undergone a full redesign process.</p> <p>Council have just completed the final peer review of the new design plans and they are currently back with the designers. Council hopes this process will hopefully be finished soon.</p>	TBC

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
#5875	O6.3	Surface water diversion from landfill areas.	Compliant	No surface water which falls on site leaves the site.	Section 4.7.3	Whilst there are no pumps to divert surface water to the ponds Council has advised that they are not required, as there is sufficient natural flow at all the required stormwater infrastructure which has been formalised so water runs via gravity to the sedimentation pond.	Completed
Incident Management and Response							
#5875	O4.1	Implement fire prevention measures.	Non-compliant	The EPA Audit (2019) states that emergency response prevention methods were not undertaken.	Section 4.18.3	Council has a Pre Incident Plan (PIP Fire) for landfill fires and this has been sent to NSW Fire & Rescue and NSW Rural Fire Services. The PIP also makes up part of the response to the Pollution Incident Response Management Plan (PRIMP). Staff have undertaken firefighting training (see WHS records)	Now compliant

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
						Council has purchased a designated firefighting water tanker.	
Requested by EA							
Waste							
-	F	Street sweeper waste to be stockpiled with green waste	Non-compliant	Due to the street sweeper waste been wet, it is disposed of down the side of the landfill or on a cell wall.	Section 4.2.3	Nil	NA
Landfilling							
-	D	Install leachate collection system for landfill cells	Non-compliant	<p>A leachate collection system and holding ponds have been developed for the existing Landfill. The leachate ponds have been 'roughed out' and they will be formalised and engineered when the new Landfill development occurs. Leachate currently remains diverted solely to existing leachate ponds.</p> <p>All leachate is kept on site and evaporated.</p>	Section 4.3.3	<p>The leachate capture system has undergone a full redesign process.</p> <p>Council have just completed the final peer review of the new design plans and they are currently back with the designers. Council hopes this process will hopefully be finished soon.</p> <p>The collection of leachate running off the landfill cell and</p>	TBC

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
						leaching out of the cell front collects in the leachate overflow pond to the east of the landfill before being pumped to the leachate pond further to the east. Due to the high evaporation rate and drought conditions there is little to no leachate collected at this time and leachate that does enter the leachate pond is left to evaporate.	
Biodiversity							
-	M	Monitor success of revegetation and enhancement works onsite and in offset areas	Compliant – where currently possible.	No information regarding revegetation success available at this stage. However, the LBMP states that throughout the majority of the BOA, no broadscale revegetation work is required due to its high resilience although some supplementary plantings may be required. The management works are currently in year 5 and therefore, assessment of the	Section 4.4.3	The Closure/Rehabilitation Plan has been approved and covers the works required for revegetation of the site.	Currently underway.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
				requirement for revegetation in MZ 1 cannot be made at this stage.			
-	Q	Assess the significance of various ephemeral swamps and water bodies as part of the Griffith Biodiversity Strategy	Non-compliant	The draft Griffith Biodiversity Management Strategy was last updated in December 2011. It has been advised from the Environment Health and Sustainability Coordinator that until an Environmental Officer (EO) is appointed on staff at TWMC, this document will remain in its current form. Even with an EO, this project is not likely to be pencilled in as a priority for review.	Section 4.4.3	Nil	NA
Surface Water							
-	D	Install sediment traps at discharge points	Non-compliant	Construction of a sedimentation basin has been completed although Council advised that there are no sediment traps installed.	Section 4.5.3	Nil	NA

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
-	I	The stormwater detention pond will be lined with a flexible membrane and the water quality monitored on a quarterly basis	Non-compliant	The stormwater pond is not lined with a flexible membrane and water quality monitoring is only undertaken twice a year.	Section 4.5.3	Construction has been completed for the Stormwater, pond, resulting in a more formalised contaminant system. Whilst there is no Flexible membrane for the stormwater pond, there has been major formalisation stormwater works up stream. Monitoring more than twice a year is not proposed.	Council looking at the Stormwater and Sedimentation Ponds in the 22/23 financial year budget.
-	Q	Visual inspection of engineering works on a daily basis	Non-compliant	Council was unable to provide documentation of daily visual inspections of erosion and sediment controls for the independent audit.	Section 4.5.3	Council will start daily inspections in 2021.	Starting 2021.
Groundwater							
-	A	Install two new groundwater monitoring bores west of the site	Non-compliant	No new boreholes have been installed in the past 10 years. However, a hydrogeological	Section 4.6.3	Nil	NA

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
				investigation carried out by Geolyse (2015) concluded that installation of additional piezometers and/or implementing a more rigorous groundwater monitoring program is not considered necessary.			
-	B	Licence new groundwater monitoring bores	Non-compliant	Unclear but possibly covered under EPL (9 Dec 2015).	Section 4.6.3	Nil	No new bores have been required in accordance with the Hydrogeological Investigation carried out by Geolyse in 2015
Greenhouse Gas Emissions							
-	B	Set greenhouse gas targets and incorporated into the landfill operational environmental management plan.	Non-compliant	No Greenhouse Gas (GHG) monitoring has been undertaken or a target set.	Section 4.13.3	Council is considering what can be done in this regard.	NA
Traffic and Transport							

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
-	B	Undertake regular road inspections.	Non-compliant	No indication of traffic and road inspections has been provided.	Section 4.16.3	Council will start daily inspections in 2021.	Starting 2021.
Incident Management and Response							
-	B	Develop and implement fire management procedures and submit with emergency services	Non-compliant	No formal fire management procedures have been provided. The Rural Fire Service responds to any landfill fires and other council departments provide resources when required.	Section 4.18.3	Council has a Pre Incident Plan (PIP Fire) for landfill fires and this has been sent to NSW Fire & Rescue and NSW Rural Fire Services. The PIP also makes up part of the response to the PRIMP. Staff have undertaken firefighting training (see WHS records) Council has purchased a designated firefighting water tanker.	Now compliant.
-	D	Public education	Non-compliant	No indication of public education or additional inspections for prohibited wastes and burning material.	Section 4.18.3	A Waste Education Plan (GCC 2020d) has been prepared and outlines the waste education programs undertaken across the community. The includes	The Plan will be implemented throughout 2021.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
						<p>school education programs, media campaigns, new resident packs, plastic free July 2021 campaign and a 2021 waste and recycling calendar.</p> <p>All waste is inspected upon entry at the Weighbridge.</p> <p>Council has advised that the site is not left until the area is fully extinguished and that section is quarantined for a day or two. Just to make sure.</p> <p>When there is an extreme fire season (summer time and over 40 degrees at night) inspections of the site are carried out throughout the night.</p> <p>Council trialled IR cameras in 2019 which alerted if the active cell was superheating.</p>	

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
-	E	Cover daily to reduce risk of ignition from lightning strikes	Non-compliant	No information regarding the frequency of tip face replacement to prevent lightning strikes.	Section 4.18.3	<p>The active cell is compacted each day which alleviates wind blow rubbish.</p> <p>The full landfill area is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m². The system still appears to meet the goals of preventing fires in the waste, controlling vermin and achieving good compaction (GCC 2020c).</p>	<p>Ongoing</p> <p>On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily.</p>
-	F	Self-combustion minimisation	Non-compliant	<p>No information regarding the spreading of green waste in layers to minimise self combustion.</p> <p>The EPA audit (2019) states that the licensee was not applying cover material over all exposed landfilled waste prior to</p>	Section 4.18.3	<p>Green waste is not used as a direct cover material, it is only used on the top of the final cover.</p> <p>The active cell is compacted each day which alleviates wind blow rubbish.</p>	<p>Ongoing.</p> <p>On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily.</p>

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	Timing of proposed action
				ceasing operations at the end of each day.		<p>On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily.</p> <p>The full landfill area is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m². The system still appears to meet the goals of preventing fires in the waste, controlling vermin and achieving good compaction (GCC 2020c).</p>	

Table 1.6: Non-compliance from EPA (2019) audit from previous AEMR

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
Requested by EPA Audit (2019)								
EPL #5875	O2	All equipment must be maintained in a proper and efficient condition and manner	Compliant	The EPA audit states that some plant and equipment was not maintained in a proper and efficient condition and was not operated in a proper and efficient manner. The EPA is concerned that not maintaining the diesel tank in a proper and efficient condition increases the likelihood of diesel spillage causing potential contamination of soil.	Section 4.1.3	New diesel counter installing including bollards. 10 yearly portable fuel station inspection undertaken (B&B Industrial 2019).	Ongoing	Completed in 2019 but is ongoing.
			Compliant	The licensee must ensure that the diesel fuel tank is	Section 4.1.3	Diesel tank sign posted.	Ongoing	Completed in 2019 but is ongoing.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
				maintained in a proper and efficient condition including: sign posted appropriately as dangerous goods and otherwise protected from being compromised by vehicular activity.		New diesel counter installing including bollards. 10 yearly portable fuel station inspection undertaken (B&B Industrial 2019).		
EPL #5875	O3.1	The EPL condition O3 specifies that all operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	Compliant	Not all operations and activities occurring at the premises were being carried out in a manner that minimises the emission of dust from the premises. The licensee must ensure the water cart is ready on an ongoing basis when dry and windy conditions prevail.	Section 4.11.3	Water carts are in use for dust suppression on unsealed roads. Operations cease when weather conditions cause low visibility. A sprinkler system and water carts are in use for dust suppression.	Immediately	Completed

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
EPL #5875	O4.1	Have in place and implement fire prevention measures to minimise risk of fire at the premises	Compliant	<p>The licensee must ensure that firebreaks and fire trails continue to be maintained.</p> <p>Vermin levels are to be brought under control.</p>	Section 4.4.2	<p>Firebreaks and trails are to be maintained.</p> <p>The Biodiversity Offset Monitoring Report (Ecoplanning 2020) states that all trails were in fair to good condition.</p> <p>Implement pest management measures – currently being undertaken.</p> <p>Council has a Pre Incident Plan (PIP Fire) for landfill fires and this has been sent to NSW Fire & Rescue and NSW Rural Fire Services. The PIP also makes up part of the response to the PRIMF. Staff have undertaken firefighting training (see WHS records)</p>	3 months from date of final report.	Ongoing

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
						Council has purchased a designated firefighting water tanker.		
			Compliant	Security of site is maintained.	Section 4.1.3	Lockable gates have been installed at all access points. All outer access gates are secured and maintained, there is a CCTV system at the Waste Transfer Station, Front Gate and the Weighbridge this is all integrated to a central server (GCC 2020c).	3 months from date of final report.	Ongoing
			Non-compliant	Combustible material at the landfill is covered at the end of the working day with VENM or other appropriate non-combustible material,	Section 4.1.3	The full area of waste is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m ² . Council states that the system still appears to	3 months from date of final report.	Currently being investigated. On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
						meet the goals of preventing fires in the waste, controlling vermin and achieving good compaction but is looking at ways of covering waste daily.		difficulty in sourcing clean fill to cover the landfilled waste daily.
EPL #5875	O5.1	The sedimentation basin and leachate holding ponds must be maintained to ensure their design capacity is available for stormwater and leachate.	Compliant	The leachate overflow pond located to the east of the current landfill has a significant amount of litter covering the dry surface.	Section 4.5.3	Remove litter and clear vegetation from floor and banks of leachate overflow pond.	3 months from date of final report.	Completed and is an ongoing process
			Compliant	The licensee must ensure that the leachate pond walls are maintained and take measures to prevent and remove vegetation from the leachate pond base and banks. The licensee must also ensure that the clay liner has adequate	Section 4.7.3	Construction has been completed for the Stormwater, Sedimentation and Leachate ponds, resulting in a more formalised contaminant system. Council is now going through the process of redesigning the	3 months from date of final report.	Completed

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
				impermeability to prevent leachate from contaminating groundwater.		leachate capture system which will cater for the: <ul style="list-style-type: none"> Existing Landfill currently Existing Landfill through to its Closure and Rehabilitation New landfill development (existing quarry) 		
			Complaint	The licensee must comply with the condition and ensure the leachate pump and discharge point into the leachate dam are fully functional and unobstructed.	Section 4.7.3	Ensure leachate pump and discharge point into the leachate dam are fully functional and unobstructed	3 months from date of final report.	Completed

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
			Compliant	The licensee must comply with the condition and remove vegetation from the sedimentation pond, base and banks, ensure that the permeability of the clay base is not compromised.	Section 4.7.3	The drainage swale that delivers the stormwater runoff into the Sedimentation Pond was reinstated, the swale outlet was also desilted in the process. Construction has been completed for the Stormwater, Sedimentation and Leachate ponds, resulting in a more formalised contaminant system.	6 months from date of final report.	Completed
EPL #5875	O5.4		Compliant	The licensee must ensure that a stock proof fence is fit for purpose, is maintained around the premises and is regularly inspected for stock intrusion.	Section 4.1.3	A stock proof fence has been installed and is maintained. The perimeter fence line is kept as a serviceable condition (GCC 2020c) and inspected three times per month. This will be	3 months from the date of final report then ongoing.	Completed and ongoing.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
						increased to daily in 2021.		
EPL #5875	O5.5	The licensee must install and maintain a high wire mesh fence of not less than 1.8 metres around the active tipping area	Non-compliant	The licensee must comply with the condition and construct the required 1.8m high meshed fence around the active landfill area.	Section 4.1.3	There is no 1.8m high mesh fence around the active tipping area. Due to the fluid nature of the active tipping area Council uses litter fences as these are mobile and are able to be relocated when the active tipping area changes (GCC 2020c). There is fencing to the west of the current landfill that was greater than 1.5m mesh fencing but this was a boundary fence.	6 months from the date of final report.	TBA
EPL #5875	O5.9	Requires that pests, vermin and weeds be controlled.	Non-compliant	The licensee must comply with the condition in full. The licensee must review the current noxious weed eradication program	Section 4.4.3	Council has a contractor who treats noxious weeds on site and a contractor who comes on site twice a year and undertakes pest animal control.	6 months from the date of final report then ongoing.	Ongoing

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
				for the site (and adjacent Council owned sites). The eradication program should aim to be complete within 6 months.		The licensee must review the current noxious weed eradication program for the site		
			Non-compliant	A further program of monitoring and maintenance must also be agreed with the EPA to ensure noxious weeds are kept under control at the site.	Section 4.4.3	Council had a Weed Control plan developed in 2019, this will be reviewed (desktop and in the field)	6 months from the date of final report then ongoing	Ongoing
			Non-compliant	The application of daily cover coupled (effective within 1 month) with a vermin control program agreed with the EPA is to be implemented within 3 months. The controls used must have minimal impact	Section 4.4.3	Council has a contractor who treats noxious weeds on site and a contractor who comes on site twice a year and undertakes pest animal control. Council had a Weed Control plan developed in 2019, this will be	6 months from the date of final report then ongoing	

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
				on native fauna species.		reviewed (desktop and in the field)		
EPL #5875	O5.10	Staff training requirements	Compliant	The licensee must design and implement a system of training of all landfill operations staff that includes the understanding of the principles and requirements of the EPL, the Pollution Incident Response Management Plan PIRMP and landfill firefighting.	Section 4.1.3	A record of the training provided for all staff and the competencies achieved are kept on their personal file (CPE 2011a). Staff have appropriate licences, permits and signed log books. Council's Human Resources department monitor and implement training as required (GCC 2020c).	6 months from the date of final report then ongoing	Completed and ongoing.
EPL #5875	O6.7	Waste screening and compaction requirements	Compliant	The licensee must ensure the minimal compaction rate is achieved.		The Site disposes 30,409 tonnes (46,785m ³) of waste annually (2018/2019 base year) based on a compaction rate of 0.65t/m ³ provided by GCC.	Immediately upon commissioning of new compactor	Compliant
EPL #5875	O6.14	The completed landfill cells	Non-compliant	The licensee must apply approved	Section 4.1.3	The full landfill area is not covered daily, but is	Immediately	On 9 December 2020 Council

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
		are to follow the prescribed requirements and the criteria for the covering of waste.		cover to the appropriate depth to the landfill at the end of the day and similar cover to the animal pits when animal carcasses are disposed of. The licensee must also ensure that asbestos disposed of on site is immediately and properly covered with VENM.		compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m ² . The system still appears to meet the goals of preventing fires in the waste, controlling vermin and achieving good compaction (GCC 2020c).		obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily.
EPL #5875	O6.15	The completed landfill cells are to follow the prescribed requirements and the criteria for the covering of waste.	Non-compliant	The licensee must ensure that cover material over the landfill is maintained. The licensee upon receipt of a significant quantity of putrescible material from a meat/chicken processing facility or	Section 4.1.3		Immediately	On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
				other such facility must cover the material as soon as practicable on the day of receipt. The material should then receive further cover when the daily cover is applied.				
EPL #5875	O6.16 / O6.17	Green waste and biosolids are stored on an impermeable bunded area	Non-compliant	An impermeable pad with bunding is required to be constructed on the site where biosolids are to be "temporarily stored". Once dried the biosolids must be disposed of to landfill. The two older windrows of biosolids and soil must therefore be transferred to the landfill for burial as soon as is practicable.	Section 4.2.3	<p>The majority of Biosolids are disposed of into landfill.</p> <p>Biosolids, if not disposed directly to landfill, is stockpiled in an area specifically isolated to allow the material to dry. These pits are eventually covered when the pit is both dry and full to capacity.</p> <p>The design of the Biosolids pad is currently being</p>	<p>Construction 6 months from date of final report</p> <p>Biosolids transfer to landfill 2 months from date of final report</p>	<p>The design of the Biosolids pad is currently being undertaken (GCC 2020c).</p>

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
				The licensee must ensure that the biosolids pad has a performance equivalent of a clay liner with a permeability of 1 x 10 ⁻⁹ m/s or less and a thickness of no less than 600mm.		undertaken (GCC 2020c).		
		Green waste and biosolids are stored on an impermeable bunded area	Compliant	A similar bunded impermeable pad needs to be constructed for the green waste stockpile(s). The licensee must ensure that the green waste pad has a performance equivalent of a clay liner with a permeability of 1 x 10 ⁻⁹ m/s or less and	Section 4.2.3	The EPA compliant green waste pad has been completed and includes a bunded area capable of capturing all leachate in accordance with the EPL performance conditions. The Green waste pad construction was concluded on the 24/2/20 and has been in use ever since (GCC 2020c).	Construction 6 months from date of final report.	Completed.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
				a thickness of no less than 600mm.				
EPL #5875	M1.2a)	Monitoring requirements	Compliant	Licensee to keep copy of chain of custody of all samples taken for auditable records. Not all monitoring results were set out as required by the condition (EPA 2019).	Section 4.19.1	Post audit, this information has been recorded.	Ongoing	Completed and ongoing.
EPL #5875	M1.3b)	Monitoring requirements	Compliant	Record time of sampling for each sample on chain of custody or other record.	Section 4.19.1	Time of sampling has been recorded since August 2019 sampling.	Ongoing	Completed and ongoing.
EPL #5875	M3	The EPL states that monitoring for the concentration of a pollutant discharged to waters or applied to a	Compliant	Monitoring must be carried out in accordance with the Approved Methods unless another method is approved in writing by the EPA.	Sections 4.1.3 and 4.6.3	Field calibration reports from Envirodata have been provided demonstrating compliance with approved methods. Council has advised that testing is carried	3 months from date of final report	Completed and ongoing.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
		utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved in writing by the EPA before any tests are conducted		The licensee must determine the level of compliance of the sample analysis testing methods. Where methods are not compliant ensure the method used is approved by the EPA before further testing.		out by Council staff with suitable water and ground water sampling experience and the Contactor (Australian Laboratory Services) who analyses the groundwater samples has had their analysis techniques approved by the EPA.		
EPL #5875	R2.1		NA	The EPA must be notified of the activation of the PIRMP immediately (as soon as practical) due to a pollution incident, irrespective of the material harm factor.	Section 4.18.3	The Annual return report states that there were no incidents of environmental harm during the reporting period (GCC 2020c).	Ongoing	Ongoing
EPL #5875	R2.2		NA	Ensure all written incident reports are received by the EPA	Section 4.18.3	The Annual return report states that there were no incidents of	Ongoing	Ongoing

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
				within the required 7 day limit.		environmental harm during the reporting period (GCC 2020c).		
EPL #5875	R4.1f)	Criteria for recording fires	NA	Add observations regarding smoke direction and dispersion to report.	Section 4.18.3	There was no fire in this reporting period (GCC 2020c).	Ongoing	Ongoing
EPL #5875	R4.1g)	Criteria for recording fires	NA	Provide estimate of amount of waste combusted.	Section 4.18.3	There was no fire in this reporting period (GCC 2020c).	Ongoing	Ongoing
EPL #5875	R4.1i)	Criteria for recording fires	Compliant	Provide a mechanism to ensure lessons captured in both addressing fire and preventing fire. Add preliminary actions to report.	Section 4.18.3	PRIMP training is undertaken every year, this is where a scenario is chosen and the training deals with how the site would respond to the incident. From this scenario training the PIRMP is updated if needed.	Ongoing	1 month from date of final report
EPL #5875	R4.2	Criteria for recording fires	NA	Once emergency services are notified and Licensee's response initiated the EPA must be	Section 4.18.3	There was no fire in this reporting period (GCC 2020c).	Ongoing	Ongoing

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
				notified of any fire on the premise.				
Protection of the Environment Operations (General) Regulation 2009- Chapter 5, Part 5.7A	153C b)		Complaint	Review what actions landfill staff would take other than notification if an actual or potential pollution event was to take place. If an Emergency Response Plan or incident/ emergency work instructions for Tharbogang landfill etc, exist then they need to be linked to the PIRMP.	NA	PRIMP training is undertaken every year, this is where a scenario is chosen and the training deals with how the site would respond to the incident. From this scenario training, the PIRMP is updated if needed.	1 month from date of final report	Ongoing
Protection of the Environment Operations (General) Regulation 2009- Chapter 5, Part 5.7A	153C c)		Complaint	Licensee needs to have procedures in place to assist emergency services response to a pollution incident (and other incidents).	NA		1 month from date of final report	Ongoing

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
Protection of the Environment Operations (General) Regulation 2009- Chapter 7, Part 3A	98 C (1) a)	Description of the hazards	Compliant	Re-evaluate risk assessments considering external impact factors.	NA	This was undertaken as part of the yearly review of the PIRMP.	1 month from date of final report	Completed and ongoing.
Protection of the Environment Operations (General) Regulation 2009- Chapter 7, Part 3A	98 C (1) d)	Inventory of potential pollutants	Compliant	The licensee must ensure that an inventory of all potential pollutants is included in the PIRMP.	NA	See Section 7 (pg 14) of the PIRMP which refers to Appendix 20.8 which contains the Inventory of Pollutants. Appendix 20.10 show shows the location of these pollutants.	Within 2 months of the date of the Final Report	Completed.
Protection of the Environment Operations (General) Regulation 2009-	98 C (1) f)	Safety equipment and other devices	Compliant	Update list including storage location etc. Include plan of locations of materials.	NA	See Section 8 (pg 14) of the PIRMP details this information. Appendix 20.8 which contains the Inventory of Pollutants. Appendix 20.9 is a map showing the locations	Within 3 months of the date of the Final Report	Completed.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
Chapter 7, Part 3A						of the equipment detailed in Section 8.		
Protection of the Environment Operations (General) Regulation 2009- Chapter 7, Part 3A	98 C (1) g)	Contact details of key personnel	Compliant	Update section 2.6.1 to include authorisation details etc.	NA	Section 10 (pg 15) of the PIRMP details this information	1 month from date of final report	Completed.
Protection of the Environment Operations (General) Regulation 2009- Chapter 7, Part 3A	98 C (1) i)	Early warning mechanisms to neighbours	Compliant	Develop notification update protocol.	NA	Section 12 (pg 17) the PIRMP details this information	Within 2 months of the date of the Final Report	Completed.
Protection of the Environment Operations (General) Regulation	98 C (1) j)	Arrangements for minimising the risk of harm to site personnel	Compliant	Develop protocol.	NA	Section 11 (pg 17) of the PIRMP details this information	Within 2 months of the date of the Final Report	Completed.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
2009-Chapter 7, Part 3A								
Protection of the Environment Operations (General) Regulation 2009-Chapter 7, Part 3A	98 C (1) l)	Reduction of risk or harm to health	Compliant	Update PIRMP to identify human health risks and how notifications etc, will assist in reducing risk.	NA	Section 11 (pg 17) of the PIRMP details this information	Within 2 months of the date of the Final Report	Completed.
Protection of the Environment Operations (General) Regulation 2009-Chapter 7, Part 3A	98 C (1) m)	Staff training	Compliant	Include relevant training of critical personnel in Plan	NA	Section 16 (pg 22) details this information	1 month from date of final report	Completed.
Protection of the Environment Operations (General)	98 C (1) n)	Testing dates and lead person	Compliant	Include in PIRMP the date the document was tested and the name	NA	Section 17 (pg 23) details this information as does the table at the start of the PIRMP	Immediately	Completed.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
Regulation 2009-Chapter 7, Part 3A				of the lead person testing the Plan.				
Protection of the Environment Operations (General) Regulation 2009-Chapter 7, Part 3A	98 C (1) p)	Manner plan tested and maintained	Compliant	Section 2.8 does not go into sufficient detail to describe how the Plan will be tested and maintained. The section also needs to show what happens when an incident occurs and the PIRMP is subsequently reviewed to address issues arising from the response.	NA	Documentation of the annual scenario Training and PIRMP Testing is kept in Council document management system and can be produced when required. Section 11 of the PIRMP outlines actions to be taken during a pollution incident. Section 18 outlines document testing and includes a desktop simulation and a practical exercise / drill. Testing includes testing the effectiveness of the training.	1 month from date of final report	Completed.

NA = not available; TBC = to be confirmed

It was recommended that the compliance tables in Section 4 of the 2019 AEMR and the above **Table 1.5** and **Table 1.6** are used as a 'checklist' for future compliance and ensuring conditions are met as additional criteria are triggered (blue).

Areas of non-compliance (red) were flagged to be addressed promptly and areas where insufficient information was available (white) be reviewed by Council. Where data is available it was recommended that it should be reviewed to identify areas of non-compliance or provide the relevant information to enable the assessment of compliance to be revised.

1.1.5 Management plans and monitoring programs / reports

Several management plans have been prepared for the site. These have been prepared in accordance with the conditions of consent and the PA:

- Air Quality Monitoring Program
- Annual Tharbogang Offset Monitoring 2016, 2017 and 2018
- Blast Management Plan
- Cultural Heritage Management Plan
- Independent Environmental Audit
- Landfill & Environmental Management Plan
- Noise & Vibration Monitoring Program
- Noise Monitoring Report
- Pest Animal Control
- Pollution Incident Response Management Plan (PIRMP)
- Landscape & Biodiversity Plan (LBMP)
- Soil, Water & Leachate Management Plan
- Tharbogang Waste Management Centre Pre-Incident Plan (Fire)
- Transport Management Plan
- Waste Monitoring Program
- Waste Screening & Tracking Program
- Weed Control Plan
- Landfill Closure and Rehabilitation Plan
- Biodiversity Management Plan (BMP) (awaiting approval)

1.1.6 Compliance assessment

Each relevant section is reviewed to determine compliance with the regulatory framework. The categories presented in **Table 1.7** have been allocated to the compliance assessment.

Table 1.7: Compliance assessment criteria.

Compliance	Colour	Description
Yes	Green	Meets the criteria specified.
Partly	Orange	Some aspects do not meet the relevant criteria and further improvement is needed.
No	Red	Does not meet the criteria specified.
Undetermined	White	Unable to determine with current data.
Not triggered	Blue	Condition not triggered yet as works in this area have not began

1.1.7 Independent audit

An independent audit was not undertaken during this reporting period. The next independent audit is scheduled for 2021.

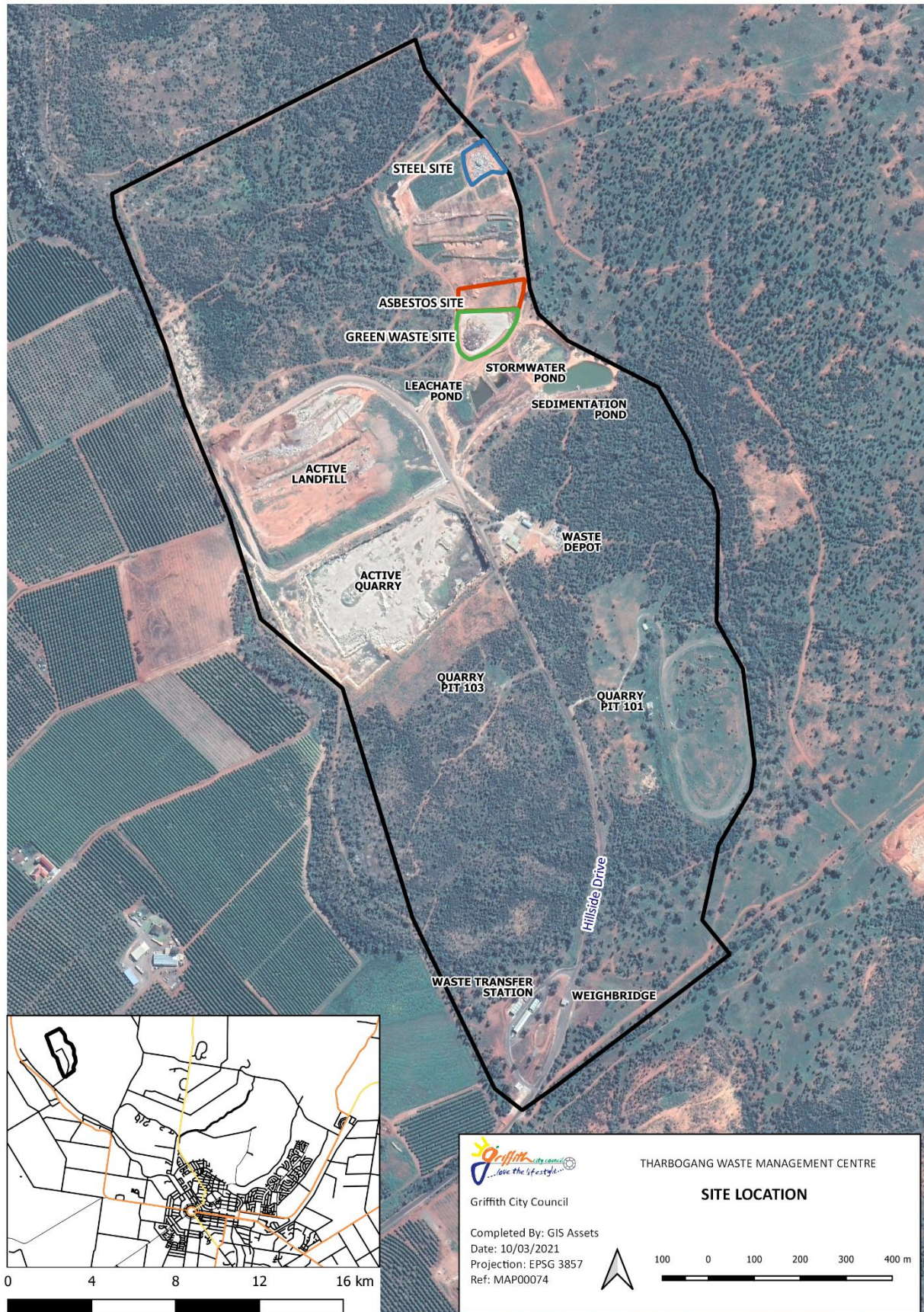


Figure 1.1: Site location.

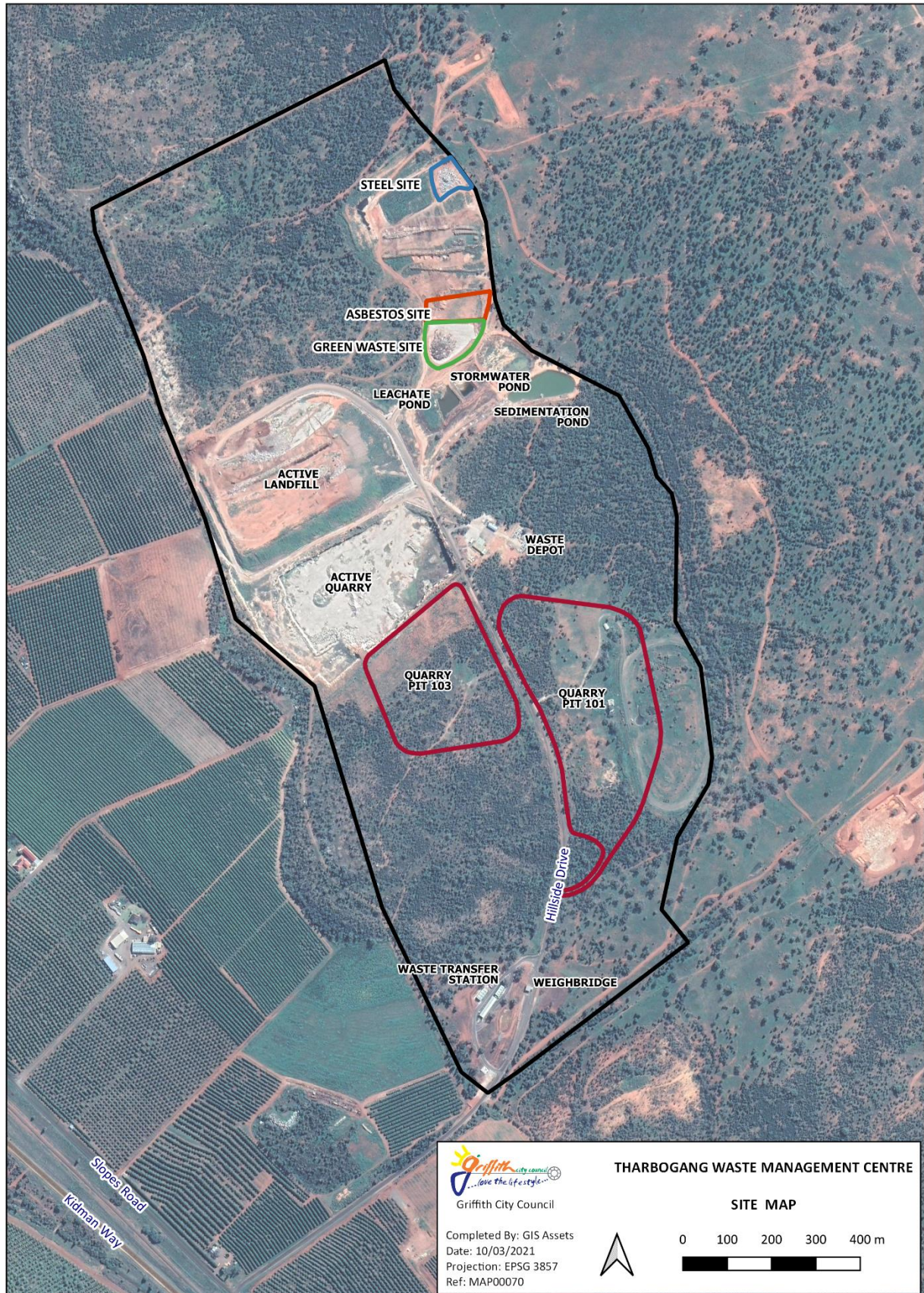


Figure 1.2: Project layout

2. Landfill and quarry operations

The following section summarises the work completed, data collected during the reporting period and any work planned for the next monitoring period.

2.1 Production data

Waste to landfill was 35,478 tonnes in 2020, 33,976 tonnes in 2019, 29,129 tonnes in 2018, 31,357 tonnes in 2017 and 25,505 tonnes in 2016. Recycled waste is also reported in this manner, which was 671 tonnes in 2020, 752 tonnes in 2019, 797 tonnes in 2018, 303 tonnes in 2017 and 398 tonnes in 2016. **Table 2.1** below includes a breakdown of the waste received at TWMC over the past six years.

Table 2.1: Waste received at TWMC

Activity	2015	2016	2017	2018	2019	2020
Waste leaving landfill (steel, tyres, green waste, oil, mattress) - recycling	430.0	398.3	303.3	797.1	752.4	671.07
Gravel	16,665.6	50,361.9	45,942.9	8,360.6	10,923.6	1,359.0
MSW	8,599.2	8,763.8	8,477.6	8,348.7	8,477.2	9,570
C&D	5,642.02	5,284.8	11,446.0	8,124.8	9,355.0	11,814
Green waste	1,134.8	1,016.8	2,621.4	1,344.6	741.7	1,021
C&I	11,606.07	11,456.4	11,614.2	12,655.9	15,403.0	13,073
Clean fill	0.0	0.0	631,330.8	29,393.1	36,958.8	28,396
Total waste in landfill	25,847.3	25,505.1	31,537.8	29,129.4	33,976.9	34,478

Quarry extraction figures for the past four years are included below in **Table 2.2**.

Table 2.2: Quarry extraction figures

Year	Extraction figures
2015	16,665.6
2016	50,361.9
2017	45,942.9
2018	8,360.6
2019	10,923.6
2020	8,914.4

2.2 Work completed this reporting year

The following activities have been completed at TWMC during 2020:

- The Green waste pad construction was concluded on the 24/2/20 and has been in use ever since (**Figure 2.1**).
- As part of the stormwater redesigned and construction project, new cut off drains, culverts and piped drains have been constructed including along the southern landfill boundary (**Figure 2.2**).
- Installation of a new motorised sliding gate at the front of the Tharbogang Waste Management Centre. Connection to an access control system and upgrading of existing CCTV (**Figure 2.4**).



Figure 2.1: Completed Green waste pad



Figure 2.2: Stormwater pipes



Figure 2.3: Installed gate



Figure 2.4: Showing backfilled and levelled area inside the gate

2.3 Works scheduled

The following works schedule is an estimate only (Property Risk Australia 2018):

- Landfilling within the existing quarry: 2030 (calendar year)
- Quarrying within Pit 101: 2030 (calendar year)
- Quarrying within Pit 103: More than 20 years
- Sealing of 500 m of access road which was previously gravel.

2.4 Hours of operation

The licenced hours of operation for the TWMC are in the PA and EPL. The EPA was contacted to verify the discrepancy between the operation and blasting hours listed in the PA and EPL and it was advised that the EPL conditions would apply.

Currently the landfill operates from 8:00am to 5:00pm 7 days per week. Licenced quarry operations are presented in **Table 2.3**.

Table 2.3: Licenced hours of operation as per the EPL.

Activity	Day	Licenced operating hours
Landfilling operations and quarrying operations	Monday – Friday	6:00am to 5:30pm
	Saturday, Sunday and Public Holidays	8:00am to 6:30pm
Blasting	Monday – Saturday	9:00am to 5:00pm
	Sundays or Public Holidays	Not permitted.

2.5 Environmental performance

Several monitoring programs and management plans have been prepared for the TWMC, see **Section 1.1.5**.

The EPL requires that the results from any monitoring conducted by this licence, or, a load calculation protocol, be recorded and retained. To minimise environmental harm, a Pollution Incident Management Plan (PIRMP) (Griffith City Council 2018a) has been prepared for the site. This plan defines what a pollution incident is, the likelihood of occurrence and pre-emptive actions to be taken. Pollution incidents are categorised as either Air, Water, Noise or Land pollution incidents. Previous risk assessments of the likelihood of each pollution incident occurring has been assessed, they concluded that all pollution incident categories have a low likelihood of occurring and are actively regulated by the EPL.

2.5.1 Waste

Waste is managed in accordance with the TWMC Waste Monitoring Program and Waste Screening & Tracking Program.

Waste brought to the landfill site is weighed and checked at the weighbridge by staff. The staff member allocates the waste into a category and directions are provided to the appropriate area to unload the waste. Data regarding the vehicle registration, customer details and destination of the waste (i.e. landfill, recycling, quarry, service vehicles) is entered into a database.

The TWMC does not receive any trackable wastes nor any waste sludges as they are not permitted under their EPL, except for asbestos. Asbestos is received but is only trackable when conveyed across state borders which is unlikely to be brought to TWMC (CPE 2011b).

For vehicles taking recovered or processed materials away from the TWMC, the procedure is similar to that used for vehicles entering except when the vehicle is heavier upon exiting. The difference in entry and exit weight is the weight of materials leaving the site. The material type is documented so a record of material movements can be kept. For quarry materials, an invoice is also generated (CPE 2011b).

All weighbridge data is stored in an electronic database. A record of the training provided for all staff and the competencies achieved are kept on their personal file (CPE 2011a).

Results and review of the waste environmental performance is addressed in **Section 4.2**.

2.5.2 Landfill and Environmental Management Plan (LEMP)

A Landfill and Environmental Management Plan (LEMP) (Griffith City Council 1999) has been developed for TWMC to provide an operational design model to document work practices. This plan sets out work practices and priorities towards achieving environmental goals, compliance with statutory obligations, public safety, waste minimisation, conserving of land resources, provision of a quality service in a cost effective manner, monitoring of operations and impacts upon the environment and progressive site rehabilitation and post closure development. The landfill is intended for the reception and disposal of wastes classified as 'Class 1 Inert Waste' and 'Class 1 Solid Waste'. This plan was prepared in 1997 and revised in 1999.

Results and review of the landfills environmental performance is addressed in **Section 0**.

2.5.3 Soil, water and leachate management

Surface waters from the quarry floor/catchment runoff is diverted to a detention basin to the east of the garbage depot leachate detention basis. A further 3rd stormwater siltation basin is located downstream of the quarry and leachate detention basins. The 3rd basin is filled infrequently and is usually dry. Surface intercept and diversion berms have been provided to the east of the landfill. Further bunding has also been provided, in conjunction with trenches to the northern alignment of the "old" putrescible pits (trenches) in the western slopes of the Waste Depot. (Griffith City Council 1999).

The soil at the site is comprised of colluvial and residual sandy clay. Sandy gravelly clay is specifically found on lower slopes and clayey sandy gravel to sandy gravel on higher ground. The general geological lithology profile of the soil is determined to be weathered conglomerate from 0.5 to 3.0 metres below ground level (mbgl), fresh conglomerate from 3.0 to 6.0 mbgl and siltstone from 6.0 to 30.0 mbgl (Geolyse, 2015).

The geology of the site is Late Devonian in age (Geolyse, 2015). Its geology is primarily comprised of sandstone and siltstone with conglomerate bands (Geolyse, 2015). The two-main near-horizontal stratigraphic sequences at the site are the Mailman Gap Conglomerate member and the underlying Jimberoo Member (Coffey Mining Pty Ltd, 2008). The elevation of the site varies between 120 and 140 m Australian height datum (AHD) Surface elevation of Tharbogang Swamp down slope of the site is approximately 110 m AHD (Geolyse, 2015).

A Soil, Water and Leachate Management Plan (SWLMP) (CPE Associates 2011a) has been prepared to inform the management of surface water, groundwater, leachate, erosion and sedimentation at TWMC. Data is collected at monitoring points upstream of the site, the sediment basin and for the site. Boreholes, leachate dams and Tharbogang swamp are monitored biannually to identify potential impacts from TWMC activities. The *TWMC Groundwater Annual Environmental Performance Report 2018-19* provides detail regarding the methods used to monitor groundwater (Stygoecologia 2019).

Groundwater monitoring aims to provide long-term data from which accurate interpretation of groundwater levels and water quality can be determined. Activities that may be causing adverse impacts are identified and modified. Groundwater monitoring was undertaken at nine locations. These sites consist of 6 groundwater bores that are distributed at strategic locations around the landfill area and general facility and 3 surface water sites (Stygoecologia 2019). Borehole 2 is dry and no longer requires monitoring. The parameters required to be collected are shown in

Table 2.4. Monitoring must be completed in accordance with the approved Methods Publication unless otherwise approved by the EPA.

Table 2.4: Borehole Pollutants required for analysis by the Environmental Protection Licence (EPL 2015)

Location	Pollutant	Units of Measure	Frequency
1, 3, 4, 5, 6 & 7	Alkalinity, Ammonia, Calcium, Chloride, Chlorinated volatile compounds, conductivity, Fluoride, Iron, Magnesium, manganese, Nitrate, Potassium, Sodium, Sulphate, Total Phenolics, Total organic carbon, pH	All mgL ⁻¹ except conductivity (µSCm ⁻¹) and pH (pH).	Biannually
8	Alkalinity (as calcium carbonate), Calcium, Chloride, Chlorinated volatile compounds, Conductivity, Fluoride, Iron, Magnesium, Manganese, Nitrate, Potassium, Sodium, Sulphate, Total Phenolics, Total Organic carbon, Total suspended solids, pH	All mgL ⁻¹ except conductivity (µSCm ⁻¹) and pH (pH).	Biannually
9	Alkalinity (as calcium carbonate), Ammonia, Calcium, Chloride, Chlorinated volatile compounds, Fluoride, Iron, Magnesium, Manganese, Nitrate, Potassium, Sodium, Sulphate, Total Phenolics, Total Organic carbon, Total suspended solids, pH	All mgL ⁻¹ except pH (pH).	Biannually

All stormwater at TWMC is contained on site. Surface water impacts include contaminated runoff and an increase in erosion in disturbed areas. There are six sources of water which need to be considered; potable water, surface drainage water, ground water, potentially contaminated stormwater, underdrain water and landfill leachate. Separate storage ponds are required for leachate and quarry/landfill runoff; these are stored in ponds as specified in the EPA guidelines for aqueous liquid treatment ponds. Landfill leachate is isolated from all other sources of runoff and contained to allow the water to evaporate. A leachate pond with a 500 KL capacity has been constructed at TWMC. Under the current landfill expansion, this pond will be expanded to a 620 KL capacity. It will be pumped back to landfill rehabilitation areas where it will be used to irrigate rehabilitated vegetation areas or to the active landfill to promote the bioreactor process. The rehabilitation areas have been designed to ensure that there is no runoff from these areas. This system will promote bioremediation of any pollutants contained in the leachate.

TWMC runoff is captured in sedimentation ponds. The storages have been designed to fully contain runoff from an ARI 1:100 year, 72 hour storm. There are three ponds on site. A sediment pond with a current capacity of 0.8 ML and two stormwater detention ponds, with a capacity of 7.0 ML and 7.8 ML. These are proposed to undergo further expansion.

Results and review of the surface water, groundwater and leachate environmental performance is addressed in **Sections 4.5, 4.6 and 4.7.**

2.5.4 Meteorological monitoring

Meteorological monitoring is collected by the meteorological station at Griffith Water Reclamation Plant. Use of this station was approved by DOP & EPA in September 2011 as it complied with the requirements of the PA being in the vicinity of the TWMC. The station monitors rainfall, wind speed and wind direction in accordance with the *Approved Methods for Sampling of Air Pollutants in New South Wales guidelines*.

The mean annual rainfall for the Griffith region is 407 millimetres (mm) (BOM, 2020). The annual mean daily evaporation is recorded at 4.8 mm. (Site name: Griffith CSIRO. Site number: 075028) (BOM, 2020). Climatic data of the local area has indicated a rainfall deficit of approximately 110 mm per month. The rainfall over the last 5 years has demonstrated a declining trend (Ecoplanning 2019). Mean monthly rainfall for September 2019 to September 2020 varies between 27.8 mm (February) and 41.3 mm (October).

Results and review of the meteorological environmental performance is addressed in **Section 4.8**.

2.5.5 Biodiversity

The biodiversity offset requirements for the PA are addressed in the Landscape and Biodiversity Management Plan (Eco Logical Australia 2011).

Annual offset monitoring has been completed by Ecoplanning for the 2017, 2018, 2019 and 2020 monitoring period. Monitoring of the offset site complied with the Conservation Agreement.

Quarterly inspections are conducted in accordance with the Conservation Agreement and inform ongoing site management of the biodiversity offset area. Annual biodiversity monitoring and quarterly inspections are combined in an annual report.

Results and review of the biodiversity environmental performance is addressed in **Section 4.4**.

2.5.6 Noise and vibration

Noise and vibration impacts and exceedances relate to blasting activities and operation of the quarry plant (Balance 2009). Noise criteria is provided by the NSW Government which includes the *Industrial Noise Policy 2000* (INP), the ANZECC guidelines (2000) and the *Environmental Criteria for Road Traffic Noise for on-road traffic noise* (EPA 1999).

A Noise Impact Statement was completed by Noise and Sound Services (2008). A Noise and Vibration Monitoring Plan (NVMP) was prepared by GHD in 2013 and five noise monitoring locations identified. Monitoring of vibration and airblast overpressure is to be undertaken for the first three blasts undertaken on site and annual blast monitoring. Attended vibration monitoring is not required but will be undertaken subject to any vibration related complaints.

Noise monitoring of Tharbogang Quarry Operations 18-393 was undertaken by NGH in 2020 using six sensitive receivers in close proximity to quarry operations. Monitoring was conducted three times at each sensitive receiver over three different time periods: morning 8 am – 10:15 am, midday 11:30 – 1:30, and afternoon 2 pm – 6 pm. The afternoon monitoring was completed on the 19th November 2020, with the morning and midday periods being recorded on the 20th November 2020. The landfill site was in operation during the time of the monitoring. The quarry was not operational throughout the survey period (NGH 2020).

The results and a review of the noise monitoring program conducted during the reporting period are presented in **Section 4.9**.



Figure 2.5: Location of noise sensitive receivers (monitoring locations) – taken from NGH 2019

2.5.7 Blasting

All blasting operations are monitored through both overpressure and ground vibrations at the closest residents to the quarry. Monitoring of these metrics is required for every blast in accordance with EPL requirements. Operations regarding blasting are outlined in the *Blasting Management Plan*, required under Section 37 (Schedule 3) of the Project Approval. A copy of the following information, relating to blasting is kept in Griffith City Council's Document Management System:

- Explosive inventory worksheet,
- Blast Pre Check,
- Toolbox Talk
- Dangerous Good Shipping Documents,
- Blast Monitor results,
- Photo of Monitor,
- Notice of Blast,
- Orica Delivery Docket,
- Blast Pattern.

The frequency of blasting is to be approximately once per month. In accordance with the EPL, blasting can be undertaken between 9:00 and 17:00 Monday to Saturday and is not permitted on Sunday or Public Holidays.

One blast took place at 1.29pm on 30 September 2020.

2.5.8 Air Quality – Dust and Odour

Quarrying and landfilling may generate dust and odour. Dust baseline surveys were carried out in June 2007 (Coffey Geotechnics 2007) to determine background dust levels and comprised four sampling events over approximately one month at one site. Air quality monitoring locations are shown in **Figure 4.23**. Air quality monitoring has been undertaken monthly from September 2018.

Dust

Based on the sampling carried out at TWMC and surrounding area in 2007, all recorded dust levels were below the EPA goal (4 g/m²/month) (Balance 2009: p103-104, Table 7.9 & Figure 5.4).

A dust suppression system has been installed at the quarry and has been operational since early 2013. Additional dust abatement is undertaken by a Council water cart.

In early 2015 Council established two 22,000 L water tanks (along with water refilling capabilities) that were put in strategic locations around the landfill site so that water carts and other water dependant vehicles do not have far to travel to refill.

The pump that services the water tanks and dust suppression in the quarry was replaced in late 2017.

To further minimise dust, operations cease when weather conditions are not favourable. This includes periods of high winds and low visibility.

In January 2018, 500mtrs of previously gravelled road was sealed. This newly sealed section is the access road to the current landfill. There is now a total of 1.8kms of sealed internal roads on site at TWMC.

New air quality monitoring locations have been established and monitoring commenced at the locations shown in **Figure 4.23** in 2018.

Dust gauges measure the level of particulate matter in the ambient air. The NSW EPA Air quality guidelines are 4g/m²/month. Weather conditions during monitoring periods are also recorded. Sampling is to be undertaken in accordance with *AS3580.10.1 – Methods for Sampling and Analysis of Ambient Air – Determination of Particulate Matter – Deposited Matter – Gravimetric method* (2003). Analysis of samples is typically completed by ALS, a NATA accredited laboratory as per *Australian Standard AS3580.10.1*.

In 2019, a designated water tanker with a 15,000lt capacity was purchased, the plant items has both firefighting and dust suppression capabilities.

Odour

An odour impact assessment was completed by Griffith City Council in 2007 (GCC 2007). This report found that the proposed expansion should have no adverse odour impacts from the expansion of the landfill.

Air Quality monitoring results are available in **Section 4.11** and **0**.

2.5.9 Rehabilitation and Landscape Management

Rehabilitation and landscape management primarily refers to the rehabilitation of a landfill site once it has reached capacity and the landscaping required as part of the rehabilitation process. Currently, no rehabilitation of landfill areas is being undertaken. Once completed the rehabilitation areas will be designed to ensure that there is no runoff from these areas. Other landscape management in the form of weed removal has been undertaken in this reporting period (information supplied by Griffith City Council). This is covered in more detail within the biodiversity management section of this report.

Rehabilitation and landscape management results are available in **Section 4.14**.

2.5.10 Heritage

A survey for Aboriginal Heritage Cultural Material was undertaken on 25-26 July 2007 by Griffith Local Aboriginal Land Council (LALC) (Balance 2009: Appendix F). Further assessment was undertaken in May 2013, for the preparation and implementation of the *Cultural Heritage Management Plan* (Black Mountain Projects 2013). No known items of Aboriginal Heritage have previously been identified within the current or proposed development area onsite. However, two scarred trees occur outside the proposed expansion area. In the event of any Aboriginal artefacts becoming uncovered, all work must cease, and the Griffith LALC and National Parks and Wildlife Service must be contacted.

Heritage monitoring results are available in **Section 4.15**.

2.5.11 Traffic and Transport

No traffic monitoring data has been provided for this reporting period. Noise criteria for traffic movement is provided by the EPA (1999) and a Traffic Impact Assessment undertaken by GHD in 2007. This assessment concluded that the existing road network is adequate to meet the current and future needs of the site. On site, access ways are always to be kept clear and unrestricted. Further, only authorised personnel are permitted to enter and move around the centre site. Overall, it was determined that there are likely to be no impacts to the road network or road users anticipated from the project expansion.

Traffic and transport results are available in **Section 4.16**.

2.5.12 Incident management and response

Emergency responses are undertaken in accordance with the Council's 'procedure for incident management'. Incidents and accidents, including near misses which involve equipment, vehicles or materials are required to be reported to the supervisor immediately. A formal investigation and reporting of all incidents and accidents must be carried out as soon as possible.

The Pollution Incident Response Management Plan (PIRMP) (Griffith City Council 2012) prepared for TWMC provides guidelines that meet the requirement of the POEO Act and the procedures to be followed in the event of a pollution incident.

Fire breaks are maintained by landfill operation staff with landfill plant. If a fire starts in a landfill cell the burning waste will be separated with landfill plant. The water cert will be brought in and used to extinguish the fire. The landfill has on site a 5,000L water cart that has a hydraulic pump/spray unit. The landfill operations staff can also call on the Rural Fire Service and other

council plant available, if required. The Rural Fire Service responds to any landfill fires and other council departments provide resources when required.

There were no fire incidents over the reporting period. An assessment of the relevant criteria, the monitoring results and a compliance assessment are presented in **Section 4.18**.

3. Community relations

This section of the AEMR summaries community relations during the reporting year and, where applicable, provides comparison to previous years. There are five adjoining landholders around the quarry. The adjoining land to the east, north and north-west is owned by Council. Community relations are addressed in the PA, EPL and the EA.

The PA specifies several conditions regarding community relations for the site. Notification must be made to affected landholders and tenants if any impacts are generated which are greater than the relevant criteria (Condition 1, Schedule 4). During this period, quarterly results shall be provided to the landholders and tenants until compliance is reached. Further, a community education program must be prepared and implemented (Condition 10, schedule 4).

The EPL prescribes criteria for recording of pollution complaints (Condition M4) as well as for the operation of a telephone complaints line (M5). Under the EPL, a legible record of all complaints made in relation to pollution arising from any activity which is covered by the EPL.

Complaint records must be kept for a minimum of 4 years and provided upon request to any EPA officer. Additionally, a telephone complaints line must be operated during operating hours for the purpose of receiving any complaints from members of the public regarding activities conducted at the premises, by vehicles or from the mobile plant. The number must be made available to the public.

The EA recommended that ongoing and inclusive consultation with nearby landholders (A) is maintained, and that all community concerns are responded to and recorded on a complaints register (B).

3.1 Complaints received this reporting year

No complaints were received during 2020 annual reporting period. The Customer Service Call Centre is used as a telephone complaints line and all complaints are recorded on Council's Complaint Management System.

3.2 Comparison to previous year

No complaints were received during the 2017, 2018, 2019 nor 2020 annual reporting period.

3.3 Community involvement

The Utilities Committee was removed as a Council Committee back in 2017. As part of the RAMJO (this is a network of member councils in the Riverina area), funding is provided by the EPA to provide a number of initiatives that include:

- TWMC also fund an EnviroMentors program which is run by Keep Australia Beautiful, and they go into the schools region and talk about preselected topics. During the reporting period 20 schools were visited.

- A "Love Food hate waste" stall where TWMC select major events in the region and an educator runs workshops based on reducing waste. There were six such events where this stall was set up during the reporting period.
- A Waste Education Plan (GCC 2020d) has been prepared and outlines the waste education programs undertaken across the community. The includes school education programs, media campaigns, new resident packs, plastic free July 2021 campaign and a 2021 waste and recycling calendar.

3.4 Review

A compliance assessment has been undertaken to determine how the relevant criteria has been implemented at TWMC (**Table 3.1**). Further information is required to adequately assess the compliance in some cases.

Table 3.1: Community relations compliance assessment.

Condition	Review
Project Approval	
Criteria 1, Schedule 4	No notification was required as no impacts occurred which were greater than the specified criteria.
Criteria 10, Schedule 5	Whilst community education programs were undertaken during the reporting period. These were not approved by the Director-General. The community education program was arranged through the RAMJO Waste Group (Riverina & Murray Organisation of Councils).
EPL	
M4	No complaints were received within the reporting period. A 'Received Request Statistics' (i.e. complaints log) has been kept from July 2010 to current.
M5	No telephone complaints were received during the reporting period. All complaints are recorded on Councils Complaint Management System.
EA	
A	One blast occurred at 1.29pm on 30 September 2020 and evidence of landholder notification is available on the Blast Notice Registration Form.
B	No complaints have been received for the reporting period.

4. Environmental Monitoring and Management

This section summarises and reviews the environmental monitoring data obtained over the monitoring period (1 January 2020 to 31 December 2020). Any trends in the monitoring results occurring over the life of the project are identified. These results are analysed against relevant impact assessment criteria, previous years results and predictions in the EA. Green in each compliance assessment table in the sections below indicates compliance, orange partial compliance, red non-compliance, blue condition not triggered at this stage and white insufficient data to confirm compliance.

An independent environmental audit of the TWMC was undertaken by Property Risk Australia in March 2018. An EPA annual report (2019) was also undertaken in 2019.

4.1 Operations

Operations refers to the general day to day work completed at the site that are not specific to any other category.

4.1.1 Monitoring and management criteria

The following conditions are specified in the relevant legislation which relate to the general operation of Tharbogang Waste Management Centre.

Under the project approval:

- Current operations may be undertaken until the 31 December 2035 (Condition 7, Schedule 2).
- In a calendar year, no more than 315,000 tonnes of material shall be extracted from the quarry site (Condition 8, Schedule 2).
- All equipment owned and operated by the site must be maintained and operated correctly (Condition 12, Schedule 2).
- The area surrounding the landfill site is to be kept secure and locked when unattended (Condition 8, Schedule 3).
- The quarry and landfill must only operate within the specific hours listed by the project approval and EPL (Condition 29, Schedule 3).
- Annual production data must be recorded using the standard form for that purpose and included in this AEMR (Criteria 61, Schedule 3).
- All strategies/plans/programs, completed audits, AEMRs and other relevant documents must be provided to the relevant agencies and copies made publicly available on the website and physical copies at the site (Condition 8, Schedule 5).
- A summary of monitoring results must be made publicly available on the website which must be regularly updated (Condition 9, Schedule 5).

Criteria regarding the operation of the site is also specified within the EPL:

- Hours of operation (L5),
- All activities must be undertaken in a competent manner (O1),
- All equipment must be maintained in a proper and efficient condition and manner (O2)
- The licensee must take all practicable steps to control entry to the premises (O5.2),

- The licensee must install and maintain a stockproof perimeter fence around the premises (O5.4),
- The licensee must install and maintain a high wire mesh fence of not less than 1.8 metres around the active tipping area (O5.5),
- The licensee must install and maintain lockable security gates at all access and departure locations (O5.6),
- The licensee must ensure that all gates are locked whenever the landfill is unattended (O5.7),
-
- Staff training requirements (O5.10), and
- The criteria for the record keeping of monitoring data (M1).

Environmental Assessment (EA):

- Visual inspections of engineering works on a daily basis (A),
- Install operational backflow device on potable water (B),
- Identify, map and colour code all pipelines (C),
- Conduct site inductions and periodic refresher training for all employees, contractors and transport contractors (D), and
- Operator to maintain a logbook of extraction quantities (E).

4.1.2 Results

Quarry extraction quantities have been provided for the past four years and are shown in **Table 2.2**.

All equipment owned and operated on site is inspected daily by operation staff. Maintenance is also carried out by Council Workshop staff, when appropriate to do so.

If a breakdown occurs, then council workshop staff are called. Workshop staff will then decide if the factory service mechanics will be called to assist in rectifying the breakdown.

The landfill site currently operates from 8.00am - 5.00pm (7 days/week).

Monitoring of the boreholes on site has been published on the council's website <https://www.griffith.nsw.gov.au/cp_themes/default/page.asp?p=DOC-KCB-52-46-17> and are available to staff via the website.

Council has advised that staff have appropriate licences, permits and signed log books. Council's Human Resources department monitor and implement training as required

4.1.3 Review

The compliance of the site with regards to operations is presented in **Table 4.1**, below.

Table 4.1: Operations compliance assessment.

Condition	Review
Project Approval	
Condition 7, schedule 2	Current operations are within the 2035 requirements.
Criteria 12, Schedule 2	Equipment is inspected daily and maintenance carried out by staff.

Condition	Review
Condition 8, Schedule 3	Site operates within specified hours.
Condition 61, Schedule 3	Production data is included in Section 2.1 of this report and the completed 'standard form' included in Appendix C .
Condition 8, Schedule 5	<p>The following plans are provided on the council website:</p> <ul style="list-style-type: none"> • Waste Monitoring Program • Waste Screening & Tracking Program • Landfill & Environmental Management Plan • Soil, Water & Leachate Management Plan • Noise & Vibration Monitoring Program • Air Quality Monitoring Program • Transport Management Plan • Cultural Heritage Management Plan • Landscape & Biodiversity Plan • Independent Environmental Audit • Annual Tharbogang Offset Monitoring - 2016 • Annual Tharbogang Offset Monitoring - 2017 • Blast Management Plan • Pollution Incident Response Management Plan • Tharbogang Waste Management Centre Pest and Animal Control Plan. <p>Additionally, the EPA annual return, EPA Annual Report (2019) and EPA analysis is provided. The Independent Environmental Audit (Property Risk Australia 2018) is also on the website.</p> <p>A link to the Conservation Agreement is present but is not active - A Conservation Agreement between the Minister administering the NPW Act and Griffith City Council for the TWMC Conservation Agreement was executed on 12 July 2017 and registered on 17 November 2017, for Lots 181 and 182 in DP 756 035. This was provided as evidence for the AEMR.</p>
Condition 9, Schedule 5	Council has advised that relevant monitoring results are available on their website.
EPL	
L5	Site operates within specified hours.
O1	All practicable steps appear to be in place to ensure all activities are undertaken in a competent manner.

Condition	Review
O2	The EPA audit states that some plant and equipment was not maintained in a proper and efficient condition and was not operated in a proper and efficient manner. Staff undertake daily 'plant assessor' checks for all the plant on site. These are carried out on an IPad and are sent automatically to the workshop for action if required.
O5.3	All practicable steps to control entry into the site have been taken. All outer access gates to the Waste Management Site have pad locks on them (GCC 2020c).
O5.4	The perimeter fence line is kept in a serviceable condition (GCC 2020c) and inspected three times per month. This will be increased to daily in 2021.
O5.5	There is no 1.8m high mesh fence around the active tipping area. Due to the fluid nature of the active tipping area Council uses litter fences as these are mobile and are able to be relocated when the active tipping area changes (GCC 2020c). There was fencing to the west of the current landfill that was greater than 1.5m mesh fencing but this was a boundary fence.
O5.6	Lockable gates have been installed at all access points. All outer access gates are secured and maintained, there is a CCTV system at the Waste Transfer Station, Front Gate and the Weighbridge which is all integrated to a central server (GCC 2020c).
O5.7	Gates are locked when landfill is unattended. The Waste Management Site is secured by the last employee to leave every afternoon.
O5.10	A record of the training provided for all staff and the competencies achieved are kept on their personal file (CPE 2011a). Staff have appropriate licences, permits and signed log books. Council's Human Resources department monitor and implement training as required (GCC 2020c).
M1	Monitoring data has been recorded following the correct protocol set out in this condition.
M3	Field calibration reports from Envirodata have been provided demonstrating compliance with approved methods.
EA	
A	Council was not able to provide documentation of daily visual inspections of erosion and sediment controls for the independent audit.
B	Council's Water and Sewer Department has confirmed that there is a back flow prevention devise on the potable water supply.

Condition	Review
C	Water, sewer and electrical lines are easily identifiable onsite, and Council has mapped the location of these within their GIS mapping.
D	Council provided the Waste Departments WHS records which includes details of all those inducted and other training and the date of completion.
E	Logbooks were filled out by the operator before and after operation of plant equipment. Logbook sheets are forwarded to workshop for scheduled maintenance. Logbooks are held in landfill site office. All gravel that leaves the quarry goes over the weighbridge which is where the information for the extractive record is kept.
Not Triggered	
Criteria 8, Schedule 2	No information regarding extraction quantities has been provided as this condition has not yet been triggered. The PA only applies to pits 101 and 103 in which quarrying has not commenced.
O5.5	Landfilling activities within the existing quarry have not commenced and therefore, this requirement has not yet been triggered.

4.2 Waste

4.2.1 Monitoring and management criteria

Waste criteria is provided by the PA, EPL and EA. Under the PA, all waste outputs generated by the site should be disposed of at a suitably licenced facility (Condition 2, Schedule 3). The waste generated during the construction process must be classified and disposed of accordingly (Condition 3, Schedule 3). No more than 35,000 tonnes of general soil waste must be received over a calendar year (Condition 8, Schedule 2). Further, suitable procedures should be in place to ensure that the site does not accept prohibited waste. Staff should keep appropriate documentation of waste and receive adequate training to recognise and handle hazardous or unapproved waste (Condition 4, Schedule 3).

Only waste authorised under the EPL shall be received by the site (L2.1), which must not exceed 100,000 tonnes per year (L2.2). The EPL also includes specific criteria for the disposal of tyres (L2.3 and L2.4), that a litter management program is implemented (O5.8) and criteria for the screening, disposal, burning and covering of waste (O6.6, O6.7, O6.8, O6.9, O6.13 – O6.15). Biosolids and green waste must be stored on an impermeable pad with a bunded area capable of capturing all leachate in accordance with the EPL performance conditions.

Waste minimisation has been assessed by the EA, which provided the following mitigation and management commitments:

- Construct a waste transfer station (A),
- Re-direct recyclables for processing (B),
- Record the waste stream and amount received, recovered, recycled and disposed of in landfill (C), and
- Implement procedures for refusing prohibited wastes (D),
- Construct defined asbestos disposal zone (E),

- Street sweeper waste to be stockpiled with green waste (F),
- Monitor and manage waste prior to disposal into landfill cell and implement other measures outlined in Table 7.13 of the EA (G), and
- Operator to maintain a logbook of waste deliveries (H).

4.2.2 Results

The waste transfer station was officially opened August 2016. Two waste management programs have been developed for the site. These plans dictate how waste should be monitored with the *Waste Monitoring Program* (CPE Associates 2011b) and how the screening of waste should be undertaken with the *Waste Screening Procedures* (CPE Associates 2011c). An Asbestos Procedure (WM-PR- 013) has also been prepared that outlines the procedure for accepting and managing asbestos on site (**Appendix B**, GCC 2018c).

Waste data has been provided for calendar years. The results for the past four years are presented in **Table 4.2**. Current waste compaction is estimated to be at 630 kgm⁻³ and is compacted using the 26 tonne Tana Compactor (EPA 2018).

Table 4.2: Waste monitoring results

Year - EPA reporting period	Waste to landfill (Tonnes)	Waste Recycled (Tonnes)
2020*	35,478	671
2019	33,235	752
2018	29,129	797
2017	31,538	303
2016	25,505	398
2015	25,847	430

* = reporting period 11 September 2019 – 10 September 2020

4.2.3 Review

An assessment of the monitoring results against the regulatory framework is presented in **Table 4.3**. Construction of the waste transfer station was completed in August 2016. However, the remaining waste criteria specified within the PA, EPL and EA was unable to be assessed as no records have been provided. The location for disposal and storage of pollutants / waste is shown in **Figure 4.1**.

Table 4.3: Waste compliance assessment.

Condition	Review
Project Approval	
Condition 2, Schedule 3	<p>The EPL for the facilities where products from TWMC get recycled include:</p> <ul style="list-style-type: none"> • Mattress and Tyre Recycling: Transport Licence - 20568; Cootamundra Depo Licence (where our product goes) - 21294 • Batteries Recycling – EPA Licence - 20006 • Waste Oil (motor) – Transport Licence 7100; Facility Licence 854 • Ewaste - EPA Licence 20661 • MGB - EPA Licence - 20661 • Steel – Victorian EPA Licence - 1451

Condition	Review
Condition 3, Schedule 3	The waste generated during the construction process is classified and disposed of accordingly. This is included in the amounts shown in the 'Full Weighbridge Data Calendar Year' spreadsheet provided by Council.
Condition 4, Schedule 3	<p>Two large signs are installed at the weighbridge on of which outlines what can be dumped at the TWMC and the Waste Screening Procedures document outlines measures to screen waste loads within the weighbridge and WTS.</p> <p>A training log for all staff was provided by Council.</p> <p>Council has advised that all staff have undergone the following training:</p> <ul style="list-style-type: none"> • Asbestos • DrumMuster • Community Recycling Centre <p>These all assist with identifying waste or products that are not allowed to be disposed of on site. Evidence of the training is in the Waste Department WHS records provided by Council.</p>
Condition 8, Schedule 2	It is clear from the full weighbridge data provided, that the current waste inputs are less than the 35,000 tonne threshold imposed on the landfill.
EPL	
L2.1	Only waste permitted under this section of the licence is accepted on site and there are signs regarding this at the weighbridge
L2.2	The full weighbridge data provided shows that the annual total waste to landfill was 33,235 tonnes for 2019.
L2.3 and 2.4	Prior to 2018, recycling of tyres was an <i>ad hoc</i> management. However, all tyres disposed of on site have been recycled since 2018.
O5.8	Litter on site is collected by staff. There is no specific Litter Management Program.
O6.6 and O6.13 – O6.15	<p>The Green waste pad construction was concluded on the 24/2/20 and has been in use ever since.</p> <p>The EPA annual return report states that burning of green waste has not occurred for some time and is used for mulch.</p> <p>Green waste is eventually shredded and stockpiled north of the asbestos landfill area. The EPA audit (2019) states that the stockpile is greater than 20 m diameter and therefore, is non-compliant with the allowed 10 m diameter (condition O6.13).</p> <p>The EPA audit (2019) states that the biosolids are not stored on an impermeable bunded area. The design of the Biosolids pad is currently being undertaken (GCC 2020c).</p> <p>The full area of waste is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m². Council states that the system still appears to meet the goals of preventing fires in the waste, controlling vermin and achieving good compaction.</p>

Condition	Review
	<p>On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily.</p> <p>When waste is brought to the landfill, loads are checked at the weighbridge by the weighbridge staff. Which waste category the load fall in is determined by the weighbridge operator, the public is then directed to the appropriate areas to unload waste (GCC 2020c).</p>
6.7	Current waste compaction is estimated to be at 630 kgm ⁻³ and is compacted using the 26 tonne Tana Compactor. This is less than the 650 kgm ⁻³ rate required. With the purchase of the new compactor, it is thought that greater compaction is being achieved.
6.8	Achieved compaction rate of landfill waste (excluding cover material) is included in the annual report for the waste premises submitted to the EPA.
6.9	A filling plan has been designed and has been submitted to the local EPA office. See the LEMP by Barton (1997).
O6.16 – O6.17	<p>The majority of Biosolids are disposed of into landfill. Biosolids, if not disposed directly to landfill, are stockpiled in an area specifically isolated to allow the material to dry. These pits are eventually covered when the pit is both dry and full to capacity.. The design of the Biosolids pad is currently being undertaken (GCC 2020c).</p> <p>The EPA audit (2019) states that neither the green waste nor the biosolids are stored on an impermeable bunded area. The green waste and biosolids waste pads must be impermeable to that required and have a thickness of not less than 600mm.</p> <p>The Green waste pad construction was concluded on the 24/2/20 and has been in use ever since (GCC 2020c).</p> <p>The green waste pad includes a bunded area capable of capturing all leachate in accordance with the EPL performance conditions.</p>
O6.16 – O6.17	The green waste pad has been completed and includes a bunded area capable of capturing all leachate in accordance with the EPL performance conditions.
EA	
A	Waste transfer station has been completed.
B	The waste monitoring results provided indicates that waste is being redirected for recycling. Backflow prevention devices are installed on potable water supply lines and it is a Council policy to do so.
C	The waste stream and amount received, recovered, recycled and disposed of in landfill is recorded on a spreadsheet for each year and includes data from 2009 – 2020.
D	Procedures for refusing prohibited waste include a waste transfer station and inspections of waste entering the site.

Condition	Review
E	Asbestos is currently accepted on site, however, loads have to comply with restrictions, set out in Appendix B . Asbestos is buried on site separately from other waste north of the leachate and sedimentation ponds.
F	Due to the street sweeper waste being wet, it is disposed of down the side of the landfill or on a cell wall.
G	Procedures for refusing prohibited waste include a waste transfer station and inspections of waste entering the site. Two large signs are installed at the weighbridge on of which outlines what can be dumped at the TWMC and the Waste Screening Procedures document outlines measures to screen waste loads within the weighbridge and WTS.
H	All logbooks are taken to the workshops to enable data to be entered into specific software.

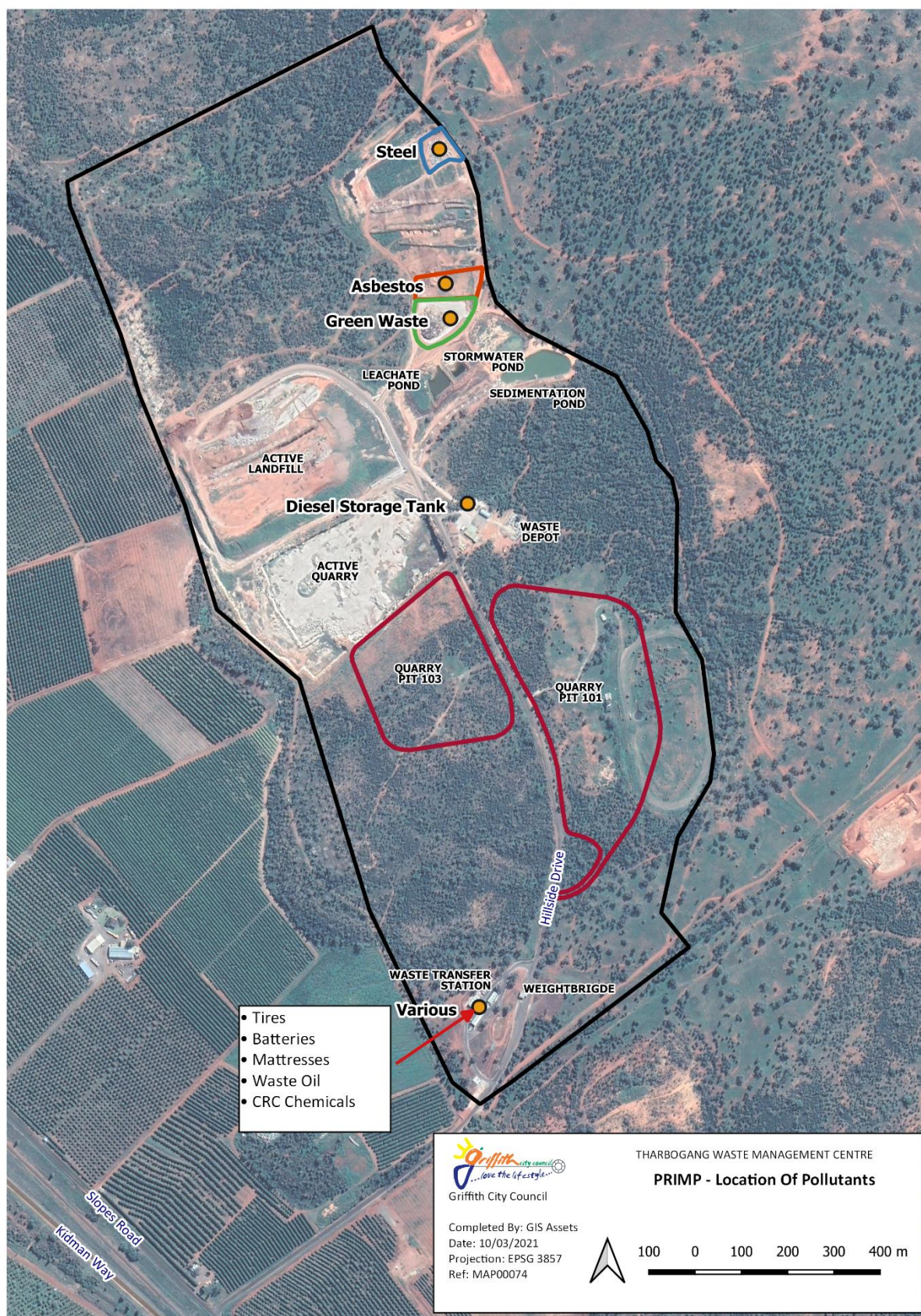


Figure 4.1: Location of pollutants / waste materials

4.3 Landfilling

4.3.1 Monitoring and management criteria

Landfilling criteria is specified within the relevant legislation.

Within the PA (Condition 7, Schedule 3), the site manager is required to:

- Minimise the exposed and active tip face at the landfill,
- Progressively revegetate all completed areas of the landfill and stabilise any exposed areas that are not required for operational purposes for a period greater than 90 days,
- Minimise the tracking of mud and water from the site on public roads,
- Fill the landfill cells in a systematic manner,
- Maximise landfill compaction rates,
- Cover the active area with at least 0.15 m of soil (or a suitable alternative material, as approved by DECCW) at the end of daily waste disposal and compaction activities,
- Progressively cap the landfill cells with the approved capping layer, which shall comprise (from top to bottom):
 - 0.15 m of topsoil,
 - A 0.85 m thick layer of uncompacted soil,
 - A sealing layer, comprising compacted clay at least 0.5 m thick and have permeability less than $k = 10^{-8} \text{ ms}^{-1}$, and
 - A seal bearing layer, comprising 0.3 m thick layer of compact, and
- Revegetate the covered landfill cells following the capping of each cell once they reach their final design height, and
- Establish and maintain a landfill incident response register and assessment of potential risks.

The PA also requires that the existing *Landfill Environmental Management Plan* be updated (Condition 13, schedule 3). It also specifies that all composting should be undertaken in accordance with *AS 4454-2003* (Condition 11, schedule 3).

Additionally, the EPL requires that the disposal of waste is managed in accordance with the progressive filling plan are outlined in the LEMP (1997) (O6.9), that completed landfill cells follow the prescribed requirements (O6.10 and O6.11) and the criteria for the covering of waste (O6.14 and O6.15). The EPL also requires that the remaining disposal capacity of the landfill be monitored (M6).

The revised EA's mitigation and management commitments relating to landfilling are as follows:

- Cap and rehabilitate the landfill on completion (A),
- Construct appropriately engineered landfill cells lined within impermeable liner and a drainage layer (B),
- Establish and maintain a landfill incident response register and assessment of potential risks (C), and
- Install leachate collection system for landfill cells (to protect Groundwater Dependent Ecosystems) (D)

4.3.2 Results

The information provided in **Table 4.4** outlines the landfill progress to date. A number of management actions are ongoing or partially complete at this stage.

4.3.3 Review

An assessment of the monitoring results against the regulatory framework is presented in **Table 4.4**. The *Landfill Environmental Management Plan* was most recently updated in March 1999. Under the PA, an additional update to this plan is required, which has not been completed. No information regarding composting of waste is provided, nor is there information regarding landfill design.

No indication of the remaining disposal capacity of the landfill has been provided for this reporting period. The EPA audit states that the licensee must cover all exposed waste at end of day with VENM or other EPA approved alternative, to depth required (refer "Environmental Guidelines Solid Waste Landfills" NSW EPA 2016). This includes landfill and animal pits. Green waste is not an appropriate cover material. Further, the licensee must also ensure that asbestos disposed of on site is immediately and properly covered with VENM (EPA 2019).

Table 4.4: Landfilling compliance assessment.

Condition	Review
Project Approval	
Condition 7, Schedule 3	<ul style="list-style-type: none"> • There is only one active cell at a time. Given the landfill is not at its completion height, only the outer sides can be rehabilitated at this stage and this is done through capping and spreading of mulched Green Waste. • Council has engaged Talis Consultants to work on a Closure and Rehabilitation Plan for the existing landfill. The plan was approved on 1 December The Closure and Rehabilitation Plan covers the works required for revegetation of the site. • 80% of the access road into the active cells is sealed. Further sealing will occur next financial year (21/22). • No mud leaves the site. • Cells are filled in a systematic manner - once a cell is filled, the next cell is used. It is always covered. • The full waste area is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m². The system still appears to meet the goals of preventing fires in the waste, controlling vermin and achieving good compaction (GCC 2020c). • On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily. • There is a register for all incident reports. This is championed by the WH&S team.
Condition 11, Schedule 3	Given composting is not undertake at the site, it cannot be undertaken in accordance with the Australia standard.

Condition	Review
	All green waste is mulched and stockpiled north of the asbestos landfill area for cover use.
Condition 13, Schedule 3	The <i>Landfill Environmental Management Plan</i> was most recently updated in March 1999.
EPL	
O6.9, O6.10 and 6.11	A filling plan has been designed and has been submitted to the local EPA office.
O6.14 and O6.15	<p>The full landfill area is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m². The system still appears to meet the goals of preventing fires in the waste, controlling vermin and achieving good compaction (GCC 2020c).</p> <p>On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily. Therefore, compliance will be achieved from 2021.</p> <p>The minimum compaction rate is achieved.</p>
M6	<p>Surveys are carried out regularly on the current landfill which provides information of the remaining air space of the landfill.</p> <p>Air Quality Monitoring is carried out monthly at four sites across Tharbogang Waste Management Centre.</p> <p>The EPA annual return states that surveys are carried out regularly on the current landfill which provides information of the remaining air space of the landfill.</p>
EA	
B	The new landfill has been constructed. A Landfill Void Detailed Design has been provided by Council.
D	<p>A leachate collection system and holding ponds have been developed for the existing Landfill. The leachate ponds have been 'roughed out' and they will be formalised and engineered when the new Landfill development occurs. Leachate currently remains diverted solely to existing leachate ponds.</p> <p>All leachate is kept on site and evaporated. There has been no leachate disposed of. What leachate is generated, is contained and natural evaporation takes place (GCC 2020c).</p> <p>The collection of leachate running off the landfill cell and leaching out of the cell front collects in the leachate overflow pond to the east of the landfill before being pumped to the leachate pond further to the east. Due to the high evaporation rate and drought conditions, there is little to no leachate collected at this time and leachate that does enter the leachate pond is left to evaporate.</p> <p>The leachate capture system has undergone a full redesign process.</p>

Condition	Review
	Council have just completed the final peer review of the new design plans and they are currently back with the designers. Council hopes this process will hopefully be finished soon.
Not Triggered	
A	Not triggered: Landfill cells are not completed and do not require rehabilitation.
C	Not triggered. Council must prepare this prior to undertaking landfilling activities within the existing quarry.

4.4 Biodiversity

4.4.1 Monitoring and management criteria

Biodiversity criteria is provided by the PA, EPL and EA.

Under the PA:

- Pests, vermin and noxious weeds found on site must be managed and regular inspection undertaken for their presence (Condition 10, Schedule 3).
- The offset requirements specified in **Table 4.5** must be implemented (Condition 45, Schedule 3).
- The Proponent shall revise the Biodiversity Offset Strategy outlined in the response to submissions (dated Feb 2010) within 3 months of the date of approval, in consultation with DECCW, aiming to (Condition 46, Schedule 3):
 - Ensure that adequate resources are dedicated towards the implementation of the strategy,
 - Provide appropriate long-term security for the offset areas to the satisfaction of the Director-General.
- The offset strategy must be implemented prior to any vegetation clearance on site (Condition 47, Schedule 3).

Table 4.5: Biodiversity Offset Requirements (Condition 8, schedule 3).

Vegetation Community	Ratio	Area cleared (ha)	Offset Area (ha)
Bimble Box-Pine	1:12.5	12.2	152.5
Dwyer's Red Gum-Currawong	1:10	3	30
Total		15.2	182.5

The EPL addresses the requirement to control pests, vermin and weeds (O5.9).

The current and predicted impacts to flora and fauna have been assessed as a part of the EA. Mitigation and management commitments are as follows:

- Develop and implement Griffith Biodiversity Management Strategy (A),
- All retained areas of native vegetation on Lot 201 and 202 (that is areas not subject to the proposed and envisaged future clearing for quarry operations) will be

- protected in perpetuity as part of the offset package and rezoned to Environment and Conservation or Environmental Management (B),
- Revegetate and enhance (where possible) to create a contiguous corridor with Lot 201 on the western boundary (C),
 - Maintain and enhance a 40m riparian zone on either side of the ephemeral drainage line (D),
 - Collect, store and/or propagate seeds for rehabilitation purposes (to be stipulated in the detailed rehabilitation plan (E),
 - Relocation of hollow trees and woody debris to corridors and areas not designated for clearing (F),
 - Clearing of hollow-bearing trees will be undertaken outside of the main bird breeding periods and trees will be inspected for resident fauna by a suitably qualified ecologist. Appropriate action will be taken prior to removal should the presence of fauna be confirmed (G),
 - Undertake detailed flora and fauna assessments of proposed offsets (H),
 - Refine the offset package described in Appendix C of the PA to the satisfaction of the DoP and implement it prior to the commencement of the new quarrying activities in order to compensate for the native vegetation to be cleared (I),
 - Enhance onsite vegetation in areas not designated for clearing through direct seeding, thinning, grazing exclusion, weed and fire management (J),
 - Develop and implement a weed and pest management strategy (K),
 - Develop and implement a weed and pest management strategy for the control and eradication of weed species and incorporate into the rehabilitation plan, and QOEMP and LOEMP (L),
 - Monitor success of revegetation and enhancement works onsite and in offset areas (M),
 - Prepare a detailed rehabilitation plan for the quarry and landfill components to achieve the rehabilitation outcomes identified in the EA (N),
 - Performance monitoring and completion criteria will be designed to demonstrate that the rehabilitation outcomes identified in the EA and rehabilitation plan are met (O),
 - Progressively clear vegetation for each quarry pit (P),
 - Assess the significance of various ephemeral swamps and water bodies as part of the Griffith Biodiversity Strategy (Q).

4.4.2 Results

A summary of the key observations and completed management actions from the annual monitoring report (2017) is presented below. A conservation area has been developed for the site (Eco Logical Australia 2011) and monitoring is regularly undertaken. For further information refer to the Annual Monitoring Report (Ecoplanning 2020).

The following survey techniques were employed:

- Photo points; eight monitoring photo points have been established. Assessment of the presence of weeds, erosion and the vegetation condition is completed and compared to previous years.
- Biobanking monitoring sites; floristic data are collected at six sites in accordance with the Biobanking Assessment Methodology (2014) and compared with baseline (2015), data from 2018 and benchmark data.

- Fauna monitoring: Surveys for microchiropteran bats is completed using Anabat equipment. At each 2ha site, a 20 min bird survey was conducted in the morning and at dusk over two days.
- Walk through assessment: Traversed on foot to record opportunistic sightings, weed species, evidence of pests, regeneration and threatened species.

The following management actions have been undertaken within the Conservation Area during the reporting period (**Table 4.6** taken from Ecoplanning 2020):

- Monitoring of photo points and biobanking monitoring plots. No significant deviations from the baseline monitoring occurred during the monitoring period.
- African Boxthorn Management occurred in May / June 2020 and September 2020 across Lots 181, 201 and 202 (MA & WM Robb Environmental Management Services 2020a, b & c).
- Weed management occurred on the 16 December 2019, and 7, 12, 13, 18 21 September 2020 (Ecoplanning 2020).
- Several weeds were dead or not found during the survey. Follow up spraying is required for some weeds as some have resprouted or remain untreated. Weed control has proven to be effective for most *Lycium ferocissimum* (African Boxthorn), although some have resprouted. Many of the *Opuntia stricta* and *Marrubium vulgare* were also looking in better health than 12 months ago. Very few *Xanthium spinosum* were found in the 2020 survey. As an annual species, it is presumed that conditions were not suitable for the species to germinate and grow in 2019 (Ecoplanning 2020).
- March 2020 quarterly monitoring identified weed germination in the south west after recent rain (Riverina Agriconsultants 2020).
- There was no evidence of Rabbits, Feral Cat or Feral Goat observed during the monitoring program (Ecoplanning 2020).
- No pest animals were observed across any of the quarterly monitoring events (Ecoplanning 2020 and Riverina Agriconsultants 2020).
- All trails were in fair to good condition.
- All fencing was observed to be in good condition and working order.
- Quarterly inspections of the Conservation Area were conducted in September and December 2019, and March, June and December 2020 by Riverina Agriconsultants. Actions arising from the quarterly inspections include; monitor and control weeds, monitor erosion in drainage lines (Ecoplanning 2020 and Riverina Agriconsultants 2020)
- No grazing occurred in 2020 (Year 5)

Recommendations included:

- Continue to monitor weeds and conduct secondary treatment for *Lycium ferocissimum*, *Opuntia* sp. and *Marrubium vulgare* as required.
- Consider digging out small *Opuntia* sp. and disposing of them in the landfill rather than spraying.
- Maintain quarterly inspections. Monitoring weed growth along the northern perimeter track.
- Above average rainfall can result in high biomass and litter levels, and a high fuel load. Fire breaks and fire trails must be maintained.

The Tharbogang Annual Return states that a total of 1,617.95 tonnes of Prickly Pear was removed from the Waste Management Site and disposed of into Landfill in 2019. There were also monthly rodent trap inspections around the building facilities which has been reported to have seen marked improvement in rodent numbers at the TWMS (GCC unpublished).

Feral fox and cat control was undertaken during October and December 2019 and March and June 2020 with 35 European Red Fox (*Vulpes vulpes*) shot and 53 Feral Cats (*Felis catus*) across the waste management facility but not in offset areas (GCC 2020b).

Table 4.6: Completed management actions for year 5 (2020) of the required monitoring period (Ecoplanning 2020).

Management action	Timing	Status
Monitoring Biobanking monitoring plots and photo points	Year 5	Complete – results of monitoring are provided
Recommend weed management thresholds and commence weed management actions in the Conservation Area in Year 1	Years 1 - 5	Weed management occurred during 2020
Pest animal control (local co-ordination with LLS and OEH)	Years 1 - 10	No pest animal control actions were undertaken.
	Years 1 – 4 Initial Rabbit Control	No pest animal control actions were undertaken. No Rabbits, evidence of Rabbits, were observed during the survey.
	Years 1-10 Fox Control	No pest animal control actions were undertaken. Foxes were observed in the Conservation Area.
	Years 1 – 10 Feral Goat Control	No pest animal control actions were undertaken. No Feral Goats, or evidence of Feral Goats were observed during monitoring.
	Years 1 – 10 Feral Cat Control	No pest animal control actions were undertaken. No Feral Cats, or evidence of Feral Cats, were observed during the survey.
Fire management hazard reduction burn	Years 1 – 10	No fire management actions were undertaken.
Maintain vehicle access to Conservation Area for fire management, weed and fencing management.	Year 2-10 Maintain tracks and fire breaks	Tracks were inspected during the monitoring period. No action was required

Management action	Timing	Status
Fencing, gates and signage	Year 1	The boundary of the Conservation Area has been fenced and signage erected. Western fence line completed in 2017. The northern boundary fence completed in 2018.
	Year 2-10 – maintain fences and gates	Fences and gates re-inspected during monitoring.
Quarterly inspections and stock management data	Years 1 - 10	Inspections were conducted in December 2019, March, June, and September 2020. No grazing occurred in year 5.
Annual Reports for Monitoring Program	Years 1 -10	Monitoring was conducted in September 2020.

Note: Biobanking monitoring data can be found in the Biodiversity Monitoring Report, EcoPlanning (2020)

** feral animal control measures were implemented in October 2019 after the biodiversity monitoring as undertaken.

4.4.3 Review

An assessment of the monitoring results against the regulatory framework is presented in **Table 4.7**.

Table 4.7: Biodiversity compliance assessment.

Condition	Review
Project Approval	
Condition 10, Schedule 3	<p>Measures have been undertaken to control pest, feral animals and weeds at the site and are undertaken regularly. Whilst their effectiveness may not be immediate, it is likely that over time changes will become evident. Quarterly monitoring is undertaken.</p> <p>African Boxthorn Management occurred in May / June 2020 and September 2020 across Lots 181, 201 and 202 (MA & WM Robb Environmental Management Services 2020a, b & c) and on the 10-11 April, 25-26 June, 16 and 31 July 2019 and May / June 2020 (MA & WM Robb 2020).</p> <p>There were monthly rodent trap inspections over 2019/2020 around the building facilities which has seen a marked improvement in rodent numbers TWMS.</p> <p>Feral cat and fox control was undertaken in October and December 2019 and March and June 2020 with many feral cats, foxes and pups removed.</p> <p>Cat traps were set in June 2020 and checked daily for two weeks but were unsuccessful, this could be due to the abundance of other food sources (GCC 2020c).</p>
Condition 45, Schedule 3	Offsetting requirements have been implemented.

Condition	Review
Condition 46, Schedule 3	The TWMC Landscape and Biodiversity Management Plan – Rehabilitation and Biodiversity Offset Strategy Plan (ELA 2013) incorporates the BOS and addresses this condition.
Condition 47, Schedule 3	Table 4.6 outlines the tasks relevant to this condition that have been completed to date as per the 2016, 2017, 2018 and 2019, 2020 Annual Biodiversity Offset Monitoring reports.
EPL	
O5.9	Pests are currently managed at site although ongoing work is required.
EA	
A	The Biodiversity Management Strategy is included in the TWMC Landscape and Biodiversity Management Plan – Rehabilitation and Biodiversity Offset Strategy Plan (ELA 2013).
B	An in-perpetuity Conservation Agreement was placed over the land in 2015.
H	Detailed flora and fauna assessments have been undertaken.
K	The TWMC Landscape and Biodiversity Management Plan – Rehabilitation and Biodiversity Offset Strategy Plan (ELA 2013) incorporates the weed and pest management strategies and addresses this condition.
L	<p>The LOEMP is still under review. The LOEMP has a section outlining the offset land, weed and pest animal monitoring requirements and refers to the relevant plans for details regarding how the work is to be undertaken.</p> <p>Weed and Pest Control Plans have been prepared and the works have commenced.</p>
M	The LBMP states that throughout the majority of the BOA, no broadscale revegetation work is required due to its high resilience although some supplementary plantings may be required. Direct seeding and tubestock revegetation was proposed within Management Zone 1 (MZ 1) should natural regeneration of the overstorey be absent after five years (ELA 2013). The management works are currently in year 5. Assessment of the requirement for revegetation in MZ 1 cannot be made at this stage as a decision whether to revegetate is to be made during year 5, with revegetation commencing thereafter.
N	A rehabilitation plan has been developed - TWMC Landscape and Biodiversity Management Plan – Rehabilitation and Biodiversity Offset Strategy Plan (ELA 2013).
O	Outlined in the TWMC Landscape and Biodiversity Management Plan – Rehabilitation and Biodiversity Offset Strategy Plan (ELA 2013).

Condition	Review
Q	<p>The draft Griffith Biodiversity Management Strategy must be finalised and include an assessment of the significance of various ephemeral swamps and waterbodies in the Griffith region.</p> <p>The Strategy was last updated in December 2011. It has been advised from the Environment Health and Sustainability Coordinator that until an Environmental Officer is appointed on staff at TWMC, this document will remain in its current form. Even with an EO, this project is not likely to be pencilled in as a priority for review.</p>
Not Triggered	
C	No information regarding revegetation and enhancement to create a contiguous corridor with Lot 201.
D	No information regarding a 40m riparian zone on either side of the ephemeral drainage line
E	No information regarding seeds for rehabilitation has been provided.
F	No information regarding relocation of hollow trees and woody debris
G	No information regarding the removal of hollow-bearing trees outside the main bird breeding period has been provided.
I	<p>Offset areas have been acquired and a Conservation Agreement reached in 2015.</p> <p>However, PA states that prior to the commencement of each quarry pit the offset package is to be refined to the satisfaction of the DoP and implemented prior to the commencement of the new quarrying activities.</p> <p>The quarry works have not commenced yet.</p>
J	No information regarding vegetation enhancement in areas not designated for clearing.
P	Clearing for the quarry pits has not commenced.

4.5 Surface Water

4.5.1 Monitoring and management criteria

Surface water criteria is provided by the PA, EPL and EA. The PA specifies the following conditions:

- Discharging water must comply with Section 120 of the POEO Act, unless provided for by an EPL (Condition 14, Schedule 3).
- Stormwater must be controlled and diverted through appropriate erosion and sediment control/pollution measures (Condition 15, Schedule 3).
- Sewerage on site shall be managed and comply with the *Environment and Health Protection Guidelines – On site sewerage management for Single Households (1998)* (Condition 16, Schedule 3).

- All water that has come in contact with waste must not be discharged from the site (Condition 17, Schedule 3).
- A Soil, Water and Leachate Management Plan must be prepared and implemented, which must include a site water balance, erosion and sediment control plan, stormwater management scheme, surface water monitoring program and surface water response plan (Condition 20-26, Schedule 3).

Surface water criteria addressed under the EPL comprises a surface water quality monitoring point (EPA point 8; Points 1, 3-7- groundwater) (M2) and the requirement to comply with the POEO Act, prohibiting the pollution of waters (L1.1). The EPL states that 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 in writing by the EPA before any tests are conducted (M3).

Surface runoff is also addressed by the EPL. The sedimentation basin and leachate holding ponds must be maintained to ensure their design capacity is available for stormwater and leachate (O5.1). Additionally, the perimeter of the areas where waste has been landfilled must be contoured to prevent stormwater running onto these surfaces from all storm events less than or equal to a 1 in 10 year 24 hour duration storm event (O5.2).

Finally, the following mitigation and management commitments were made in the EA and revised for the PA. The EA (Balance 2009) has previously assessed the surface water impacts. They identified an increase in potentially contaminated runoff from additional landfill as well as increased erosion and sediment laden runoff from disturbed areas. This is due to additional landfill and additional quarry pits and associated infrastructure. Operations have not commenced within pits 101 and 103 and the EA recommends further improvement to the Soil, Water and Leachate Management Plan:

- Preparation of a surface water management plan to the satisfaction of NSW Office of Water. This should include measures to ensure that contaminated runoff will not leave the site (A),
- Construct diversion drains and bunds around perimeter of the quarry pits (B),
- Install pumps to divert surface water to settlement and stormwater detention ponds (C),
- Install sediment traps at discharge points (D),
- Incorporate energy dissipation and erosion protection measures in surface water diversions (E),
- Install table drains, culvert pipes and silt traps on all new roads (F),
- Undertake all engineering works to minimise erosion and soil contamination; (G),
- Ensure all water storages are engineered for peak weather events (1 in 100 year 72 hour rainfall event) (H),
- The stormwater detention pond will be lined with a flexible membrane and the water quality monitored on a quarterly basis; (I)
- Install operational backflow device on potable water supply pipeline (J),
- Identify, map and colour code all pipelines on site (K),
- Construct surface water diversions around the landfill (L),
- Construct / install stormwater and sedimentation controls (M),
- Install closed leachate collection system and surface water controls around landfill (N),
- Install sedimentation dam and drainage channels to direct water from quarries (O),

- Periodically check and empty sediment trap at settlement dam (P), and
- Visual inspection of engineering works on a daily basis (Q).

4.5.2 Results

A formal site water quality monitoring plan is required. This plan forms an important part of the greater environmental monitoring plan for the site. Griffith City Council has prepared a management plan for surface water: *Tharbogang Waste Management Centre: Soil, Water & Leachate Management Plan (v2.0)*.

The following is to be monitored twice yearly at Tharbogang:

- Leachate Pond
- Sedimentation Pond
- Boreholes 1-7
- Tharbogang Swamp

Surface monitoring was undertaken in March and August 2018 within the Stormwater and Sediment Pond Dam 2 (EPA point 8) (results supplied by Griffith City Council). However, no monitoring was undertaken for Tharbogang Swamp. The pollutants monitored for, and the results of the monitoring, are presented within the groundwater monitoring in **Section 4.6.2**. Monitoring of the stormwater and sedimentation ponds is undertaken in accordance with the specific assessment criteria.

Peak weather events (1 in 100 year or 72 hour rainfall events) require water quality monitoring of stormwater detention ponds and other water storage areas. No events have occurred over this monitoring period.

Contour banks were maintained to divert any runoff. As part of the stormwater redesigned and construction project, new cut off drains, culverts and piped drains were constructed. The drainage swale that delivers the stormwater runoff into the Sedimentation Pond was reinstated, the swale outlet was also desilted in the process (GCC unpublished).

4.5.3 Review

An assessment of the monitoring results against the regulatory framework is presented in **Table 4.8**.

Table 4.8: Surface Water compliance assessment.

Condition	Review)
Project Approval	
Condition 14, Schedule 3	No water is discharged from site. The EPA annual return states that all stormwater that falls on the active landfill and quarry sites is contained on site and leachate is contained on site.
Condition 15, Schedule 3	Two stormwater control dams are on site. These are proposed to be expanded in the near future. All stormwater that falls on site is contained. Rainwater and process water is pumped from the quarry collection sumps to the stormwater collection dam.
Condition 16, Schedule 3	All sewerage is contained in two septic tanks and is emptied when required.

Condition	Review)
Condition 17, Schedule 3	No water is discharged from site.
Condition 20-26, Schedule 3	A Soil, Water and Leachate Management Plan has been developed.
EPL	
M2.1 and M2.2	Monitoring of all attributes listed in Section M2.2 of the EPL was undertaken at the relevant sites (see Groundwater section). EPA point 8 and Tharbogang Swamp had no water at and, therefore, could not be monitored.
O5.1 and O5.2	All water that falls on site is contained within sedimentation basins and the landfill perimeters have been contoured. Construction has been completed for the Stormwater, Sedimentation and Leachate ponds, resulting in a more formalised contaminant system. Council is now going through the process of redesigning the leachate capture system which will cater for the: <ul style="list-style-type: none"> Existing Landfill currently Existing Landfill though it Closure and Rehabilitation New landfill development (existing quarry)
L1.1	No water is discharged from site.
EA	
A	A Soil, Water and Leachate Management Plan has been developed.
B	New diversion drains and bunds were in the process of being constructed at the time of commencement for this AEMR.
C	Council has advised that due to the formalisation of draining system (open drains, piped section and head walls) over the years there is little to no requirement for such pumps. If water is laying around (after a large rain event) then transfer pumps are hired to move the water along into the formalised stormwater network.
D	Construction of a sedimentation basin has been completed although Council advised that there are no sediment traps installed.
E	Reinstatement of drainage swale works commenced 27/3/18 and were completed 3/5/18.
F	Table drains, culvert pipes and silt traps have been constructed.
G	All works are either designed by GCC Survey and Design section or a qualified contractor
H	Current water storages are constructed for a 1:100 ARI flood.
I	The stormwater pond is not lined with a flexible membrane and water quality monitoring is only undertaken twice a year.

Condition	Review)
	<p>Construction has been completed for the Stormwater pond, resulting in a more formalised contaminant system.'</p> <p>Whilst there is no Flexible membrane for the stormwater pond, there has been major formalisation stormwater works up stream.</p> <p>Council will start looking at the Stormwater and Sedimentation Ponds in the 22/23 financial year budget.</p> <p>Monitoring more than twice a year is not proposed.</p>
K	<p>Two stormwater control dams are on site. These are proposed to be expanded in the near future. All stormwater that falls on site is contained.</p> <p>Construction of a sedimentation basin has been completed although Council advised that there are no sediment traps installed.</p>
M	<p>All surface water is contained on site, any water in contact with the landfill site is treated as leachate.</p> <p>Construction has been completed for the Stormwater, Sedimentation and Leachate ponds, resulting in a more formalised contaminant system.</p>
P	<p>Work was undertaken on reinstatement of the drainage swale on 27/3/18. The drainage swale was roughly cleaned out over the full length and works completed 3/5/18.</p>
Q	<p>Council was unable to provide documentation of daily visual inspections of erosion and sediment controls for the independent audit.</p>
Not Triggered	
J	<p>Landfilling activities within the existing quarry have not commenced.</p> <p>All surface water is contained on site, any water in contact with the landfill site is treated as leachate.</p>
L	<p>Not triggered: Landfilling activities within the existing quarry have not commenced.</p> <p>All surface water is contained on site, any water in contact with the landfill site is treated as leachate.</p>
N	<p>Not triggered: Landfilling activities within the existing quarry have not commenced.</p> <p>All surface water is contained on site, any water in contact with the landfill site is treated as leachate.</p>
O	<p>Not triggered: Landfilling activities within the existing quarry have not commenced.</p> <p>All surface water is contained on site, any water in contact with the landfill site is treated as leachate.</p>

4.6 Groundwater

4.6.1 Monitoring and management criteria

Monitoring of groundwater includes six Boreholes, two leachate dams and one swamp monitoring point. Boreholes range in depth between 7 and 22 m.

As with surface water, the PA recommends that a Soil, Water and Leachate Management Plan must be prepared and implemented, which must include a site water balance, erosion and sediment control plan, stormwater management scheme, surface water monitoring program and surface water response plan (Condition 20-26, Schedule 3).

The EPL specifies that ground water monitoring must be undertaken at seven boreholes (although Borehole 2 is dry and no longer requires monitoring) on site (P1.1) which must comply with section 120 of the *POEO Act* (L1.1) and that specific pollutants are monitored for (M1). The EPL states that 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 in writing by the EPA before any tests are conducted (M3). The *TWMC Groundwater Annual Environmental Performance Report 2018-19* provides detail regarding the methods used to monitor groundwater (Stygoecologia 2019). It states that for groundwater monitoring, *Threshold Criteria are primarily sourced from Australian and New Zealand guidelines for fresh and marine water quality (ANZW 2018) 95% trigger values and National Environment Protection (Assessment of Site Contamination) Measure (NEPM) 2013. Other indicative threshold values (N/A) were calculated as the 80th percentile value of recorded values from 2014-2019 field data and is used as an Interim working level, in absence of reliable trigger values* (Stygoecologia 2019). Table 1 of the Stygoecologia (2019) report outlined the relevant trigger values for each analyte.

The EPL (M2) also states that for each monitoring/discharge point or utilisation area specified in the EPL (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1 of the EPL table. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns.

Finally, the EA has assessed the current and future groundwater impacts. The following mitigation and management commitments have been made:

- Install two new groundwater monitoring bores west of the site (A),
- Licence new groundwater monitoring bores (B)
- Establish and implement groundwater monitoring program in accordance with DECCW requirements (C), and
- Conduct ongoing groundwater monitoring post closure and action non-compliances (D).

The analytes and threshold criteria for groundwater monitoring sites are included in **Table 4.9** below and taken from Stygoecologia 2019.

Table 4.9: Analytes, threshold criteria for groundwater monitoring sites (taken from Stygoecologia 2019)

Water chemistry parameter	ANZECC Trigger Values for freshwater	Tharbogang trigger values
Depth (m)	N/A	N/A
pH (pH Unit)	6.5-8.5	6.5-8.5
Alkalinity (mg/L)	N/A	744
Fluoride (mg/L)	N/A	0.7
Chloride (mg/L)	N/A	2794
Sulphate (mg/L) SO ₄	N/A	513
Sp. Conductance (µS/cm)	350	350
Suspended Solid (mg/L)	N/A	138
Total Org Carbon-filtered (mg/L)	4	4
Total Phenol (mg/L)	0.32	1
Dissolved Iron (mg/L)	0.3a	0.3
Dissolved Manganese (mg/L)	1.9b	1.9
Dissolved Calcium (mg/L)	N/A	102
Dissolved Magnesium (mg/L)	N/A	184
Dissolved Potassium (mg/L)	410c	410
Dissolved Sodium (mg/L)	N/A	1775
Ammonia (as N) (mg/L) N	0.9b	0.9
Total Oxidised Nitrogen (as N) (mg/L)	0.4	0.4
Volatile Organics (ug/L)	N/A	50

N/A - 80% of recorded values is used as an Interim working level, in absence of reliable trigger values

a - Interim working level, in absence of reliable trigger value

b - Trigger value may not protect key species from chronic toxicity, refer to ANZECC & ARMCANZ (2000) for further guidance

c - Poor (acceptable) drinking water criteria, World Health Organisation Guidelines for Drinking-water Quality 2009.

4.6.2 Results

Griffith City Council has prepared a management plan for Groundwater: *Tharbogang Waste Management Centre: Soil, Water & Leachate Management Plan (v2.0)* (CPE Associates 2011a) and Stygoecologia prepared the *Tharbogang Waste Management Centre Groundwater Annual Environmental Performance Report 2018-19, Environmental Protection Licence 5875* (Stygoecologia 2019).

Groundwater Boreholes are located throughout the site (**Figure 4.2: Groundwater Borehole Monitoring Sites and Leachate Control**). Borehole depths are recorded two times in a calendar year. The results from the 2019 /- 2020 reporting period are shown in **Table 4.10** and **Figure 4.3**. The pollutants which are required to be monitored during the reporting period are

identified in **Table 4.11** and a summary of the results presented in **Table 4.12**. The trends for each pollutant over time are shown in **Figure 4.4** to **Figure 4.19**. Bore 1 is the up-gradient well and provides the background pollutant levels. Bore 1 is surrounded by irrigated agriculture to the north, west and south. However, the impact on groundwater from agriculture would be minimal as the western areas are located down-gradient to Bore 1. Leachate from buried green waste and animal waste is not intercepted and located down-gradient from the leachate collection and storage system. Bore 7 is located down-gradient of the buried green waste and animal waste (GCC 2020b).

Depth data for each borehole was collected on 17 September 2019. Groundwater levels have demonstrated a general increase over the last 5 years. This increase is comparable to the higher rainfall over the same period, followed by a declining trend during the lower rainfall periods of 2014-15 and 2018-19 (Ecoplanning 2019) (GCC 2020b).

Borehole 2 was found to be inaccessible in 2015 and has not been sampled since 2006. The replacement of this borehole was deemed unnecessary (EPA 2015). Therefore, borehole 2 shows nil results for all attributes.

There was a large drop in bore hole depth at borehole 4 from February 2020 to August 2020 and a large increase in depth at borehole 6. Bore 4 and Bore 6 standing water levels fluctuated through March 2019 - September 2020 in comparison to the other boreholes (GCC 2020b).

The pH values across all boreholes for the 2020 reporting period remained relatively stable and most were within the desired range. The pH levels were slightly alkaline to alkaline within all boreholes ranging from pH values between 6.5 and 8.5 and are within the ANZECC guidelines. Over the last twelve months the pH has ranged from 7.32 in Tharbogang Swamp consistently to 8.64 at both Bore 6 and Leachate Dam 1 (**Figure 4.4**). A peak in pH was reflected in all boreholes in the March 2020 sample results, with all results above a pH of 8 (Tharbogang Swamp was below pH 8). The 2019/2020 pH values for all boreholes are around the long-term averages (GCC 2020b).

The bores surrounding leachate dam 1 (bores 3, 4 and 5) also showed an increase in pH during March 2020 but remained within the trigger values.. The pH has remained very constant over time, varying less than 1.6 pH units throughout the entire monitoring program for all sites except leachate dam 1. It has been suggested by Stygoecologia (2019) that there is little to no connection between the leachate dam waters and groundwaters at the nearby bore locations).

According to the BOM, in March – April 2019 Griffith received approximately 34mm - 48.4mm of rainfall. This may explain the low pH levels in the boreholes. In contrast, from February to April 2020, Griffith received approximately 237mm of rainfall. This likely correlates with the higher pH level in April 2020 (GCC 2020b).

Landfilling activities are not considered to influence the pH levels of the groundwater (Geolyse, 2015).

In the period up to September 2020, alkalinity was very consistent within each of the groundwater bores with only a large increase occurring in the leachate dam peaking in March 2018. This peak quickly subsided by August 2018 (**Figure 4.5**). The cause of this peak is unknown, however, as there was minimal rainfall at the time it is suggested to be an input from an anthropogenic source. Stygoecologia (2019) suggest that the consistent values recorded for each of the other sites indicate there has been no connectivity with the leachate dam and

therefore, no contamination of either the groundwater or surrounding surface waters. Further, the consistent higher alkalinity than 80% threshold values in Bores 4-7 were considered natural background levels within the groundwater at these sites due to the higher clay content of the substrate (Stygoecologia 2019).

During the 2020 reporting period, there were no spikes in alkalinity recorded, and values remained within acceptable levels. Alkalinity values have remained consistent between March 2020 and September 2020 after a small spike in alkalinity at bore 3 in August 2019. Alkalinity values were above the required trigger values for bores 1, 4, 5 and 6 during both the March and September 2020 monitoring periods. Alkalinity levels recorded were between 89 and 1340 mg/L across the sites.

Bore 4 indicated high alkalinity levels in comparison to the other boreholes ranging from 1250mg/L – 1340mg/L from March 2019 to September 2020. This is likely due to higher clay content of the substrate (Ecoplanning 2019). The 2019/2020 alkalinity values for all boreholes are around the long-term averages (GCC 2020b).

The fluoride values in the sedimentation dam dropped significantly during periods of higher rainfall indicating a dilution during these periods and an increased concentration of fluoride during dryer periods (**Figure 4.6**). Stygoecologia (2019) suggest that the consistent values recorded for each of the bore sites over time indicate there has been no connectivity with the sedimentation dam and, therefore, no contamination of either the groundwater or surrounding surface waters.

Fluctuations in fluoride levels were most prominent at bores 1, 5, 7 and leachate dam 1 over the reporting period, with all but leachate dam 1, sediment pond 2 and Tharbogang Swamp, have values above the required trigger value during both the March and September 2020 monitoring periods.

Nevertheless, fluoride levels overall are relatively low through all boreholes. Bore 6 indicated the highest level of fluoride (1.30 mg/L), which is less than the 1.5 mg/L Groundwater Investigation Levels (GILs) – drinking water threshold (NEPM 1999). The 2019/2020 fluoride values for all boreholes are at or close to the long-term averages (GCC 2020b). The consistently higher than 80% threshold values in Bores 1-7 are considered natural background levels within the groundwater at these sites due to the higher clay content of the substrate (Stygoecologia 2019).

Chloride, sulphate, specific (sp.) electrical conductivity, dissolved sodium, total organic carbon and dissolved potassium levels were consistent across all sites over the March to September 2020 period, with a small spike at leachate dam 1 in August 2020 but this stabilised over the 2020 period.

In the period, up to September 2020 surveyed chloride was very consistent within each of the groundwater bores (**Figure 4.7**). Stygoecologia (2019) suggest that the consistent values recorded for each of the bore sites indicate there has been no connectivity with the leachate dam and, therefore, no contamination of either the groundwater or surrounding surface waters. The consistent slightly elevated values above the 80% threshold values in Bores 4 are considered natural background levels within the groundwater at these sites due to the higher clay content of the substrate. Tharbogang Swamp was dry for most of the period throughout 2019 (Stygoecologia 2019). As with results reported by Stygoecologia (2019), and most monitoring periods prior to that, levels of Chloride remained relatively constant between

monitoring periods, and saw no spikes. Chloride levels were above trigger values for bore 4 over both 2020 monitoring events and at Tharbogang Swamp in the September 2020 monitoring. Readings at the Tharbogang Swamp were 8530 mg/L in September 2020, well above the trigger values. The highest level, across the bores was 4030 mg/L, recorded at Borehole 4, and the lowest, 433 mg/L, was recorded at Borehole 3.

Bore 4 indicated significantly high levels of chloride present (3,830 mg/L – 4,030 mg/L) between March 2019 to August 2020. The trend of chloride levels (2014 – 2020) indicates that the chloride levels are consistently greater in Bore 4 than the other boreholes. Bore 4 is located down-gradient of the quarry, leachate pond and sedimentation pond. The September 2020 figure for Bore 4 is above its long-term average. Bore 1 is also above its long-term average (GCC 2020b).

A number of attributes were well above trigger values at Tharbogang Swamp over the March and September 2020 monitoring periods namely, dissolved calcium, chloride, specific electrical conductivity, dissolved iron, sulphate, total organic carbon and suspended solid.

The values recorded for sulphates (**Figure 4.8**), specific electrical conductivity (**Figure 4.9**), sodium (**Figure 4.10**), total organic carbon (**Figure 4.12**) and dissolved potassium (**Figure 4.14**) over the period up to the August 2019 survey replicated the pattern exhibited by chloride by having very consistent values within each of the groundwater bores and a large increase occurring in the leachate dam, peaking in March 2018. The consistently elevated values above the ANZECC guidelines threshold values in all sites are considered natural background levels by Stygoecologia (2019). Levels of sulphate, specific electrical conductivity, sodium, total organic carbon, and dissolved potassium have remained relatively constant since the reporting of Stygoecologia (2019).

Bore 1 and Bore 4 indicated a high level of sulphate present in comparison to the other boreholes. Bore 1 ranged from 404mg/L – 569mg/L with a gradual increase through the year. Bore 4 ranged from 444mg/L – 565mg/L with relative fluctuations through the year (GCC 2020b).

Sulphate levels in Bore 1 have risen in the 2019/2020 sampling period from 2017/2018 from 398 mg/L to 569 mg/L. Sulphate levels in Bore 4 have also risen in the 2019/2020 sampling period from 2018/2019 from 378 mg/L to 565 mg/L. Overall, the levels of sulphate are consistent with up-gradient Bore 1 (GCC 2020b).

The sulphate threshold GILs for drinking water is 500 mg/L (NEPM 1999). All boreholes generally have met this threshold through the 2019/2020 year, except for Bore 1 which exceeded the threshold from August 2019 and Bore 4 which exceeded the threshold from September 2020. The level of sulphate in all boreholes are less than or close to their long-term averages (GCC 2020b).

Dissolved sodium levels were within the required range at all sites except Bore 4 (both monitoring months) and Tharbogang Swamp in September 2020 where levels were significantly raised.

Bore 4 indicated a high level of dissolved sodium in comparison to the other boreholes. The results indicate an average level of 2,312 mg/L within the year 2019/2020 in Bore 4. Bore 4 is located down-gradient of the sedimentation pond, leachate pond and quarry. In March 2019 dissolved sodium levels for Bore 4 were above the long-term average. The 2019 dissolved sodium levels for Bore 7 were also above the long-term average (GCC 2020b).

Bore 4 indicated a high level of conductivity throughout the year. Since analysis started in 2014, Bore 4 indicated the highest level of conductivity in comparison to the other boreholes. Between March 2019 – September 2020, the conductivity level in Bore 4 ranged from 11,800 -13,800 uS/cm, with a level of 11000 uS/cm in August 2020. The levels of conductivity in all other boreholes are similar or less than the conductance level in up-gradient Bore 1. The 2019/2020 conductance values for all boreholes are less than or close to the long-term average (GCC 2020b).

Total Suspended Solids (TSS) levels increased substantially in the surface water sites particularly during periods of lower rainfall. This is suggested to be a result of greater concentrations of chemicals during periods of higher evaporation as the values reduced during periods of higher rainfall. Suspended solids increased at most sites over the 2020 period, although the greatest spike was seen at Tharbogang Swamp and a large decrease in suspended solids was recorded at Bore 7. Bore 6 and Bore 7 recorded much high level of suspended solid present (GCC 2020b). However, most suspended solid readings were within the required range except for September 2020 for bore 1 and Tharbogang Swamp and March 2020 for bore 7. Readings at Bore 7 and Tharbogang Swamp were well above the trigger value (**Figure 4.11**). The fluctuations for Bore 6 over previous years are considered natural background levels within the groundwater due to the higher clay content of the substrate by Stygoecologia (2019). In August 2019, Bore 6 indicated a level of 511 mg/L. In March 2020, Bore 7 indicated a level of 616 mg/L. It has been suggested that suspended solids is not a suitable parameter for groundwater (GCC 2020b).

Total organic carbon was above trigger values for all sites except Bore 3 and Bore 1 in March 2020. Bore 5 has a relatively high level of total organic carbon-filtration in comparison to the other boreholes (**Figure 4.12**). Since analysis began in 2014, Bore 5 indicated significant fluctuations. March 2020 sampling shows an increase in total organic carbon in Bore 4, Bore 5 and Bore 6. Values of total organic carbon decreased for Bore 5 and Bore 6 in the September 2020 results. Values of total organic carbon rose between March 2020 and September 2020 for Bore 1, Bore 4 and Bore 7 (GCC 2020b).

The elevated concentrations of total organic carbon in Bore 5 could likely be due to metabolic by-products resulting from microbial breakdown of organic matter present in the landfill (Geolyse, 2015), which are then displayed down-gradient. It could also be a result of leaching of hydrocarbon-based contaminants from the landfill (Geolyse, 2015).

The values recorded for dissolved calcium over the period up to the September 2020 survey differ in trend pattern from other analytics in that while groundwater values were low and very consistent over time, elevated values were recorded at Tharbogang Swamp and Bore 7 (**Figure 4.13**). The peak value in Tharbogang Swamp in 2019 was thought to correspond with a low rainfall period closely following a high rainfall event with the implication that the rainfall event stimulated overland flow producing an input or turbidation of clay sediments (naturally high in calcium content) into the swamp. Stygoecologia (2019) suggest this is corroborated by elevated levels of suspended solids and pH during the same time period. The elevated levels in Bore 7 were suggested to be the result of the higher clays in the substrate surrounding the bore with a similar response to the higher rainfall events in 2016-17. Stygoecologia (2019) suggested that the consistently elevated values above the 80th percentile threshold values in Bore 7 are considered natural background levels for this location..

Bore 7 has a significantly high level of dissolved calcium present in comparison to the other boreholes. However, the results indicate a gradual decrease through the year and has been

steadily decreasing from a peak of 495 mg/L in April 2017 to 176 mg/L in September 2020 (GCC 2020b).

The elevated levels of dissolved calcium in Bore 7 is suggested to be the result of higher clay in the substrate surrounding the bore (Ecoplanning, 2019). Bore 7 is located down-gradient of the buried green waste and animal waste. March and August 2019 and March 2020 levels of dissolved calcium are above the long term average (GCC 2020b).

All dissolved potassium levels were within the required range (**Figure 4.14**). Bore 4 and Bore 7 had high levels of dissolved potassium in comparison to the other boreholes. Bore 4 levels are consistently fluctuating. Bore 7 levels are decreasing from a peak of 212 mg/L in April 2017. The results indicate a gradual decrease from March 2019 – September 2020. Bore 1 indicated an increase by September 2020 (102 mg/L) in comparison to March 2019 (96 mg/L). Bore 3, 5 and 6 levels of dissolved potassium are below the levels in Bore 1 (GCC 2020b).

Bore 7 is located down-gradient of the buried green waste and animal waste. Bore 4 is located down-gradient of the sedimentation pond, leachate pond and quarry. March 2019 and March 2020 dissolved potassium levels for Bore 4 and Bore 7 were above their long-term averages (GCC 2020b).

Dissolved iron was above trigger thresholds for all sites (**Figure 4.15**). Larger spikes were evident in Bores 1, 3, 6 and 7 over the reporting period with Bore 1 dropping again in September 2020.

Bore 3 indicated a dissolved iron level of 6.56mg/L in March 2019, which fell to 1.36 mg/L in August 2020 then rose to 4.28 mg/L in September 2020. Bore 5 indicated a fluctuation in August 2019 with a level of 3.27 mg/L. Bore 7 also indicated a fluctuation in March 2020 with a dissolved iron level of 6.14 mg/L. Dissolved iron levels for Bore 1, Bore 3 and Bore 6 increased from March 2020 to September 2020 (GCC 2020b).

March 2019 and September 2020 dissolved iron levels for Bore 3 were greater than its long-term average. March 2020 dissolved iron levels for Bore 7 were greater than its long-term average (GCC 2020b).

In 2019, the dissolved iron values for all sites were higher than the ANZECC Guidelines Trigger values and were suggested to be natural background levels within the groundwater due to the higher clay content of the substrate and geology (Stygoecologia 2019).

Total phenols were consistently recorded as less than 1 over time and at each site. This value is above the value of 0.32 for the ANZECC Guidelines trigger value. As there is no variation across sites Stygoecologia (2019) suggested this must be assumed to be natural background levels. Therefore, the Tharbogang trigger value was considered 1 mg/L.

Dissolved magnesium (**Figure 4.16**) levels exceed the trigger values at Bores 1, 4, 5, 7 and Tharbogang Swamp over the period up to the September 2020, although in March 2020 the values for Bore 5 and Tharbogang Swamp were within the required range. A sharp spike is evident from March 2020 to September 2020 at Sediment Pond Dam 2 and Bore 7 has seen dissolved magnesium levels steadily decreasing since March 2019.

Bore 7 indicates a significantly high level of dissolved magnesium present with a level of 472mg/L in March 2019. The level had gradually decreased to 296 mg/L by September 2020. Bore 7 has the consistently highest value of dissolved magnesium. Bore 7 is located down-

gradient of the buried green waste and animal waste. Dissolved magnesium levels for all other boreholes are consistent with the levels in up-gradient Bore 1 (GCC 2020b).

All sites recorded dissolved manganese values that are below the ANZECC Guidelines Trigger value of 1.9 mg/l during the 2020 reporting year (**Figure 4.17**).

Ammonia values exceeded the ANZECC Guidelines trigger levels in four locations including Bores 3 (on trigger value), 5 and 7 and the leachate dam (**Figure 4.18**). This trend is consistent with that seen in the 2019 reporting period. Ammonia values increased substantially post the higher rainfall event in late 2016 through to early 2017. These elevated levels have reduced significantly post this period and were predicted to continue to drop during the low rainfall period. It is suggested these elevated records were the result of either an increase in sewage discharge into the Waste Treatment Facility or the application of fertilisers on the surrounding landscape or from leaching of the Green waste area following the rainfall events. The fact that the highest values were recorded at Bore 7, which is geographically isolated from the leachate dam or other sewage discharge locations and is directly adjacent to the Green Waste area would indicate that the rainfall event stimulated overland flow that contained high levels of ammonia or fertilisers and potentially entered the bore from the surface. The other sites were consistently low over the monitoring period (Stygoecologia 2019). All sites except the leachate dam showed a decrease in ammonia over the reporting period.

Bore 7 had a high level of ammonia in comparison to the other boreholes. However, the level of ammonia in Bore 7 has gradually decreased from 23.8 mg/L to 6.81 mg/L within the year, and from a peak of 5.6 mg/L in March 2017. Ammonia levels within the other boreholes are generally consistent with the levels for up-gradient Bore1 (GCC 2020b).

The observed decrease in ammonia concentrations is likely related to oxidation of ammonia into nitrate/nitrite, and/or downgradient dissipation (Geolyse 2015). Previously elevated records were the result of either an increase in sewage discharge into the Waste Treatment Facility or the application of fertilisers on the surrounding landscape or from leaching of the green waste area following rainfall events (Ecoplanning 2019).

Bore 7 is geographically isolated from the leachate dam or the sewage discharge locations and is directly adjacent to the green waste and animal burial area (Ecoplanning 2019). This could indicate that a rainfall event stimulated overland flow that contained ammonia or fertilisers and leached into the bore from the surface (Ecoplanning 2019). Bore 7 is located down-gradient of the buried green waste and animal waste. March and August 2019 and March 2020 ammonia levels for Bore 7 were greater than its long-term average (GCC 2020b).

There is not a GILs value for ammonia for drinking water. However, the GILs for ammonia for fresh waters is 0.9 mg/L (GCC 2020b).

The ANZECC guidelines trigger level for oxidised nitrogen is 40µg L⁻¹. The values recorded for Total Oxidised Nitrogen over the period up to September 2020 survey were consistent, although above the trigger values, at all bore sites, except Bore 7, and at leachate dam 1. Elevated levels were recorded from Bore 7 (**Figure 4.19**).

Total Oxidised Nitrogen (TON) values in Bore 1 to Bore 6 were between 0 mg/L and 40 mg/L for the 2019/2020 period, compared to the TON level in Bore 7 of 378 mg/L to 472 mg/L between March 2019 to March 2020. The Bore 7 TON value decreased to a level of 338 mg/L by September 2020. Bore 7 is located down-gradient of the buried green waste and animal

waste. August 2019 and March 2020 total oxidised nitrogen levels for Bore 7 were greater than its long-term average (GCC 2020b).

GILs nitrate levels for drinking water is 50 mg/L (NEPM 1999), well below the values for Bore 7. However, the nitrate values for Bore 1 to Bore 6 meet the 50 mg/L criteria (GCC 2020b).

Volatile organics were consistently recorded as less than 50 ug/L over time and each site. As there is no ANZECC Guidelines trigger value for this parameter, and there is no variation across sites, Stygoecologia (2019) assumed it must be the natural background levels.

Over the period commencing August 2017 and August 2018 there was a major spike in the leachate water levels for conductivity, alkalinity, chloride, sulphate, potassium, sodium and total organic carbon, all peaking in March 2018. However, levels have remained fairly stable over the March and September 2020 monitoring periods.

Stygoecologia (2019), have investigated the likely cause spikes, over the 2019 reporting period as outlined below.

General conclusions from the above results include (NGH 2020a):

- Depth to groundwater has fluctuated in the last three years. Upward trends and peaks in the data for the last year correlates with increases in monthly rainfall.
- pH patterns have remained stable for all bores with all peaking in March 2020 following increased rainfall.
- Elevated levels of dissolved calcium and magnesium were recorded in Bore 7. However, these levels have been decreasing from peaks in August 2017.
- Sulphate, fluoride, alkalinity, chloride and specific conductance levels have remained steady through the 2019/2020 period for all bores.
- Elevated ammonia levels over the past four years have been steadily decreasing. Elevated ammonia levels are still observed in Bore 7. Elevated ammonia levels in Bore 3 have been decreasing through the 2019/2020 period.
- Total oxidised nitrogen levels are elevated in Bore 7.

The elevated levels of ammonia and total oxidised nitrogen in Bore 7 over the 2019/2020 period indicate further investigation is required to determine the source of these elevated nutrients (NGH 2020a).

The rainfall over the 5 years preceding the 2019/2020 monitoring period has demonstrated a declining trend. This has resulted in the some of the driest conditions observed throughout the Councils monitoring program. There were only a small number of rainfall events during in October 2018 and April/May 2019. This was followed by almost no rain up until the survey in August 2019 (Stygoecologia 2019).

Stygoecologia (2019) found that groundwater levels have demonstrated a general increase over the last 5 years comparable to the higher rainfall over the same period, followed by a declining trend during the lower rainfall periods of 2014-15 and 2018-19 (**Figure 4.3**). The variability in groundwater levels is an indication of surface or surface water/groundwater connectivity.

The most significant drawdown in groundwater levels over the 2018-19 year occurred in Bores 4 and 5 whereas bores 6 and 7 recorded higher values. Bore 1 and 3 have remained relatively

stable over the last 5 years. The bores 4, 5 and 3 appear most responsive to major rainfall events, respectively, and indicate a strong connection and rapid recharge of the groundwater within 1-2 weeks. These bores are located adjacent to the sediment pond and main landfill pit respectively. Bores 6, 7 and 1 on the other hand, demonstrate a delayed or minor (Bore 1) response of approximately 12 months to rainfall and are therefore, predominantly disconnected from surface flows (see **Table 4.10**) (Stygoecologia 2019).

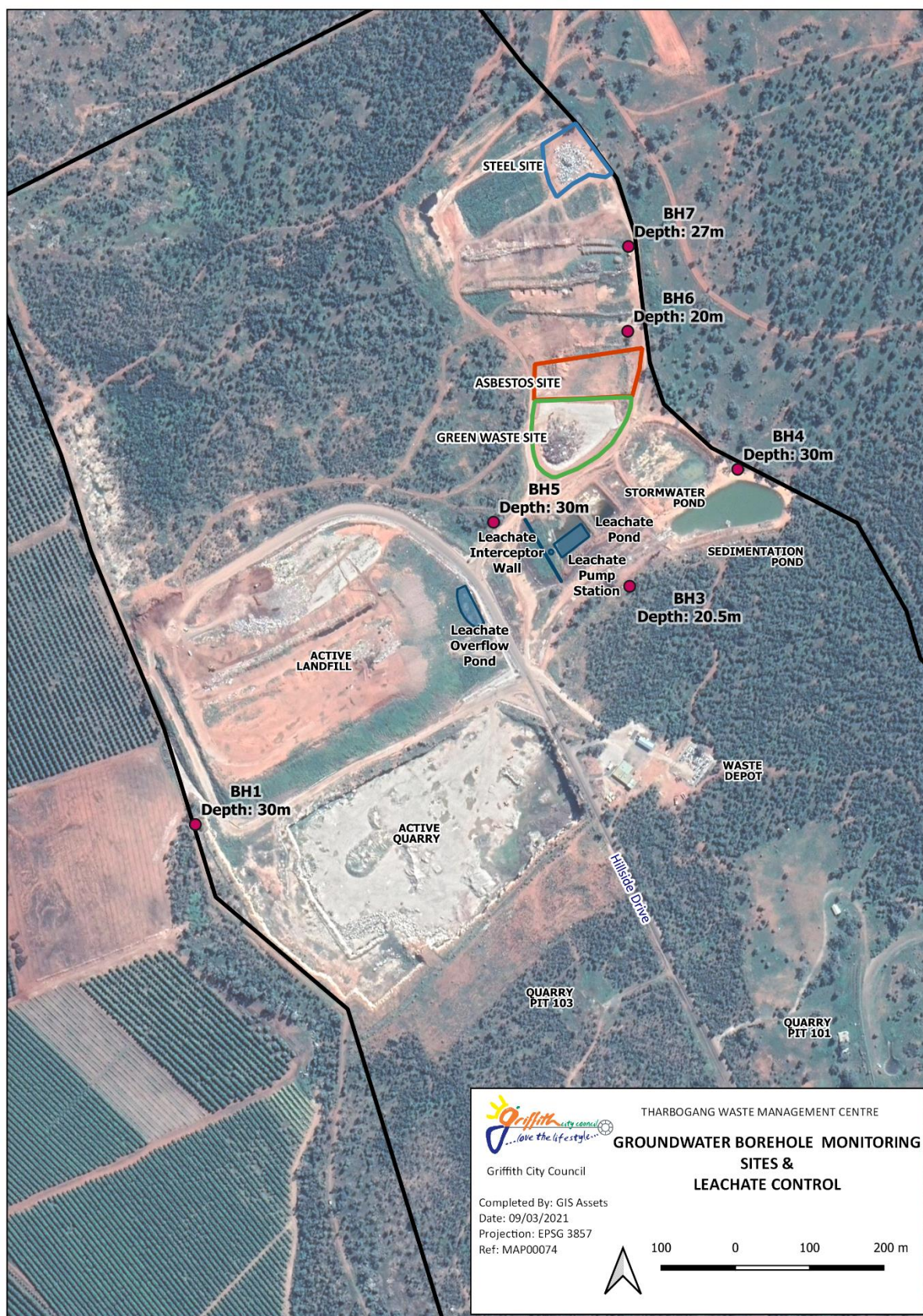


Figure 4.2: Groundwater Borehole Monitoring Sites and Leachate Control

Table 4.10: Borehole depths during the monitoring period

Monitoring Point	Depth (m)	
	Mar-20	Sept-20
Borehole 1	14.90	14.59
Borehole 2	0.00	0.0
Borehole 3	15.60	14.56
Borehole 4	20.40	7.25
Borehole 5	18.40	19.25
Borehole 6	9.50	18.26
Borehole 7	20.50	20.74

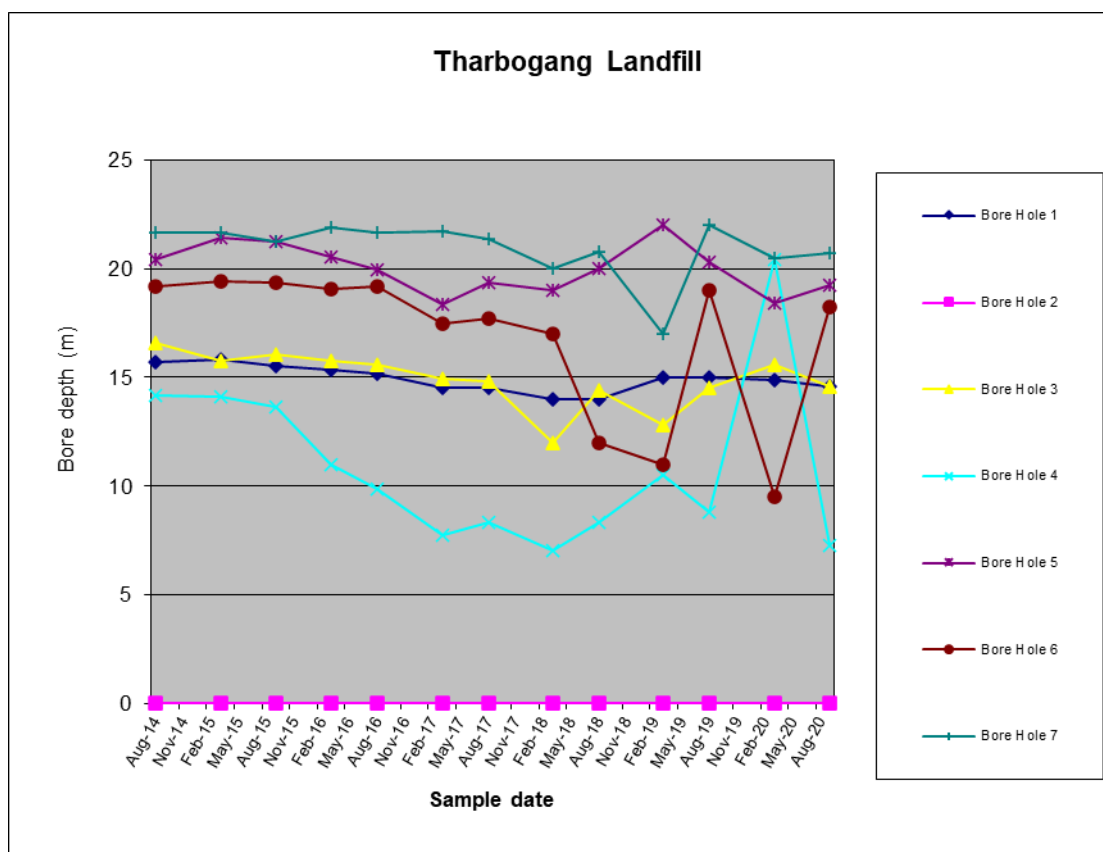


Figure 4.3: Bore surface water levels and bore depths recorded for all sites since August 2014.

Table 4.11: Pollutant monitoring required by the EPL and completed during the reporting period.

Pollutant	Borehole Number					
	1-7		8		9	
	Frequency	Completed	Frequency	Completed	Frequency	Completed
Alkalinity (as calcium carbonate)	2 times	Y	2 times	Y	2 times	Y
Ammonia	2 times	Y	2 times	Y	2 times	Y
Calcium	2 times	Y	2 times	Y	2 times	Y
Chloride	2 times	Y	2 times	Y	2 times	Y
Chlorinated volatile compounds	2 times	Y	2 times	Y	2 times	Y
Conductivity	2 times	Y	2 times	Y	Not required	Y
Fluoride	2 times	Y	2 times	Y	2 times	Y
Iron	2 times	Y	2 times	Y	2 times	Y
Magnesium	2 times	Y	2 times	Y	2 times	Y
Manganese	2 times	Y	2 times	Y	2 times	Y
Nitrate	2 times	Y	2 times	Y	2 times	Y
Potassium	2 times	Y	2 times	Y	2 times	Y
Sodium	2 times	Y	2 times	Y	2 times	Y
Sulphate	2 times	Y	2 times	Y	2 times	Y
Total Phenolics	2 times	Y	2 times	Y	2 times	Y
Total organic carbon	2 times	Y	2 times	Y	2 times	Y
Total Suspended solids	Not required	Y	2 times	Y	2 times	Y
pH	2 times	Y	2 times	Y	2 times	Y

N: Not required

Table 4.12: Summary of groundwater results during the monitoring period.

Monitoring Point	Date	Alkalinity (mg/L)	Ammonia (as N) (mg/L) N	Dissolved Calcium (mg/L)	Chloride (mg/L)	Volatile Organics (ug/L)	Sp. Conductance (uS/cm)	Fluoride (mg/L)	Dissolved Iron (mg/L)	Dissolved Magnesium (mg/L)	Dissolved Manganese (mg/L)	Total Oxidised Nitrogen (as N) (mg/L)	Dissolved Potassium (mg/L)	Dissolved Sodium (mg/L)	Sulphate (mg/L) SO ₄	Total Phenol (mg/L)	Total Org Carbon-filt (mg/L)	Suspended Solid (mg/L)	pH
Trigger value		744	0.9	102	2794	50	350	0.7	0.3	184	1.9	0.4	410	1775	513	1	4	138	6.5-8.5
Borehole 1	Mar-20	796	0.1	44	1990	<50	8490	1.20	0.45	207	0.016	13.4	83	1260	523	<1.0	<1	79	8.26
	Sep-20	925	0.1	37	2420	<50	9530	1.30	3.14	204	0.056	31.8	102	1500	569	<1.0	17	189	7.66
Borehole 2	Mar-20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Sep-20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Borehole 3	Mar-20	317	0.9	7	433	<50	1970	0.80	1.58	16	0.064	0.06	12	326	23	<1.0	<1	21	8.29
	Sep-20	312	1.4	7	450	<50	1900	0.80	4.28	15	0.061	0.43	12	31	32	<1.0	1	108	7.39
Borehole 4	Mar-20	1114	0.1	77	3780	<50	13000	0.80	0.96	189	0.191	0.10	151	2360	447	<1.0	27	30	8.44
	Sep-20	1340	0.04	91	4030	<50	13800	0.80	0.44	228	0.035	0.50	141	2380	565	<1.0	31	<5	7.51
Borehole 5	Mar-20	890	1.81	101	1600	<50	6660	1.00	1.82	182	0.328	0.48	62	895	162	<1.0	48	18	8.33
	Sep-20	882	1.36	92	1770	<50	6620	0.90	1.24	178	0.242	2.49	67	972	192	<1.0	32	18	7.37
Borehole 6	Mar-20	821	0.05	51	1950	<50	7980	1.30	1.45	121	0.018	1.90	71	1300	289	<1.0	15	49	8.64
	Sep-20	963	0.03	34	1920	<50	7440	1.30	2.82	91	0.034	1.29	68	1280	295	<1.0	6	65	8.04
Borehole 7	Mar-20	765	8.78	199	1260	<50	8860	0.70	6.14	356	0.220	472	170	966	326	<1.0	13	616	8.25
	Sep-20	838	6.81	176	1240	<50	7620	0.80	1.43	296	0.178	338	137	935	303	<1.0	16	80	7.46
Leachate dam 1 Pt 9	Mar-20	119	0.25	16	408	<50	1640	0.50	0.39	16	0.010	7.31	56	225	65	<1.0	11	8	8.64
	Sep-20	375	7.03	32	363	<50	1740	0.40	0.72	29	0.160	1.10	59	206	35	<1.0	31	8	8.20

Monitoring Point	Date	Alkalinity (mg/L)	Ammonia (as N) (mg/L) N	Dissolved Calcium (mg/L)	Chloride (mg/L)	Volatile Organics (ug/L)	Sp. Conductance (uS/cm)	Fluoride (mg/L)	Dissolved Iron (mg/L)	Dissolved Magnesium (mg/L)	Dissolved Manganese (mg/L)	Total Oxidised Nitrogen (as N) (mg/L)	Dissolved Potassium (mg/L)	Dissolved Sodium (mg/L)	Sulphate (mg/L) SO4	Total Phenol (mg/L)	Total Org Carbon-filt (mg/L)	Suspended Solid (mg/L)	pH
Trigger value		744	0.9	102	2794	50	350	0.7	0.3	184	1.9	0.4	410	1775	513	1	4	138	6.5-8.5
Sed Pond dam 2 Pt 8	Mar-20	139	0.06	18	24	<50	399	0.40	0.6	9	0.046	0.03	17	39	14	<1.0	6	10	8.36
	Sep-20	164	0.1	18	44	<50	463	0.40	0.31	112	0.015	0.18	16	41	17	<1.0	12	7	8.42
Tharbogang Swamp	Mar-20	86	0.07	398	1980	0.00	8340	0.40	0.67	154	0.187	0.04	49	1100	1110	0.00	33	70	7.45
	Sep-20	167	0.21	833	8530	<50	28200	0.30	12.1	664	0.682	<.01	66	4580	3000	<1.0	51	723	7.32

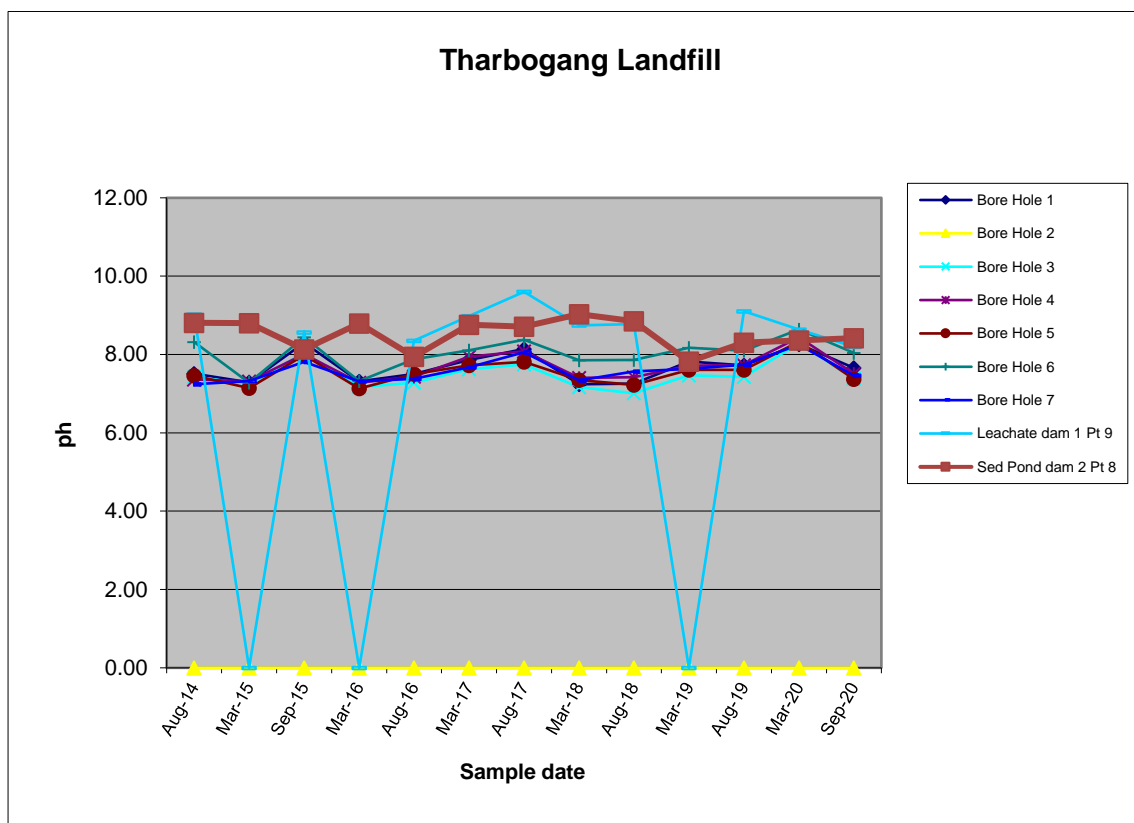


Figure 4.4: pH trends

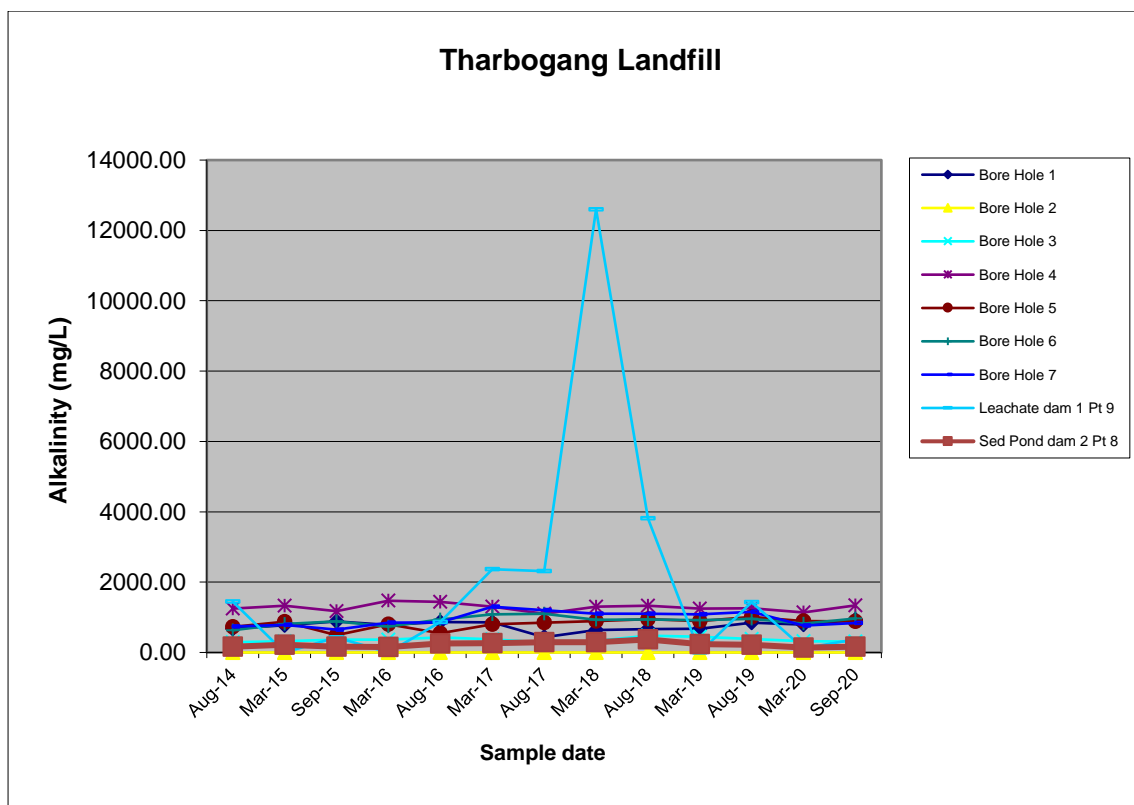


Figure 4.5: Alkalinity trends

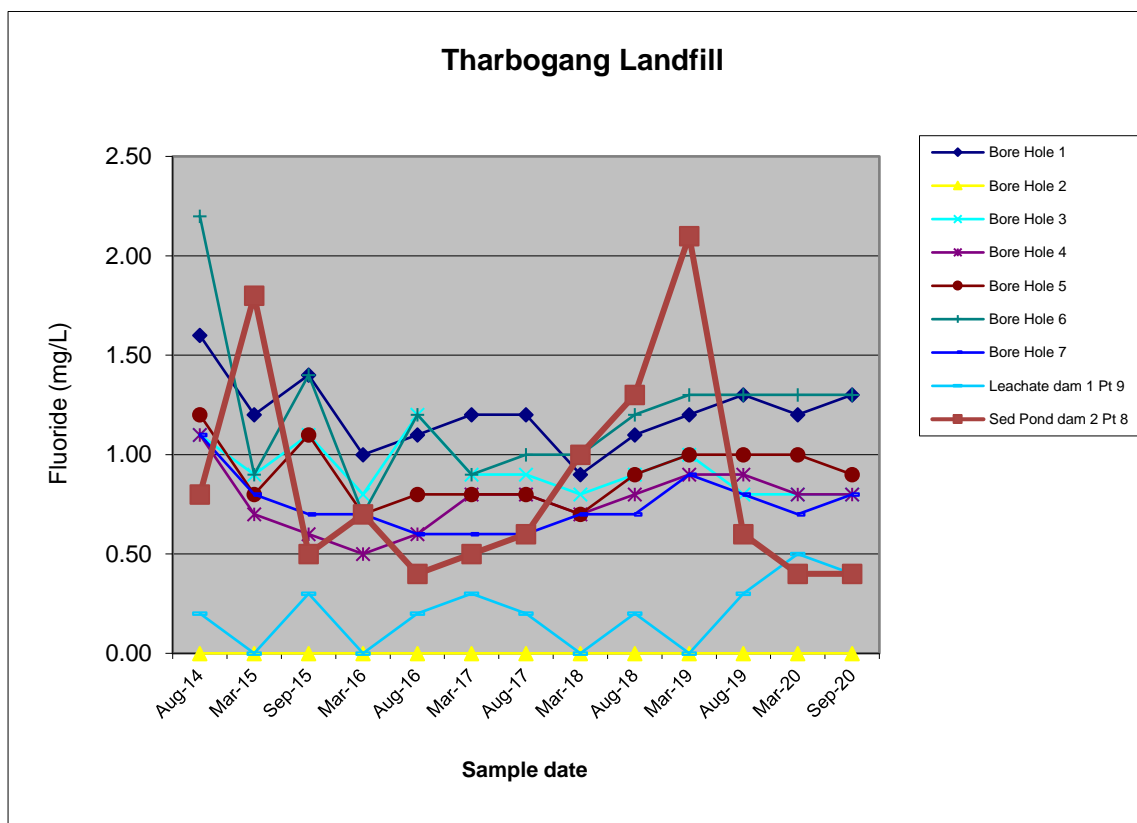


Figure 4.6: Fluoride (mg/L)

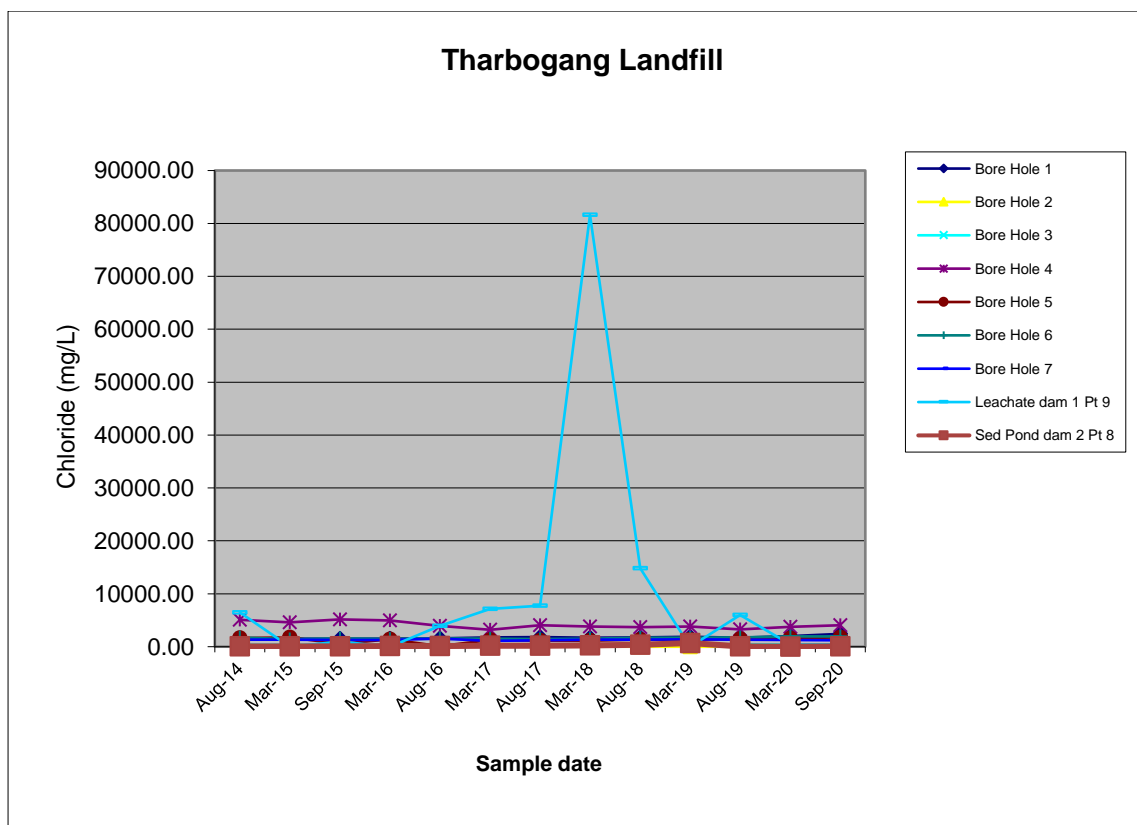


Figure 4.7: Chloride trends

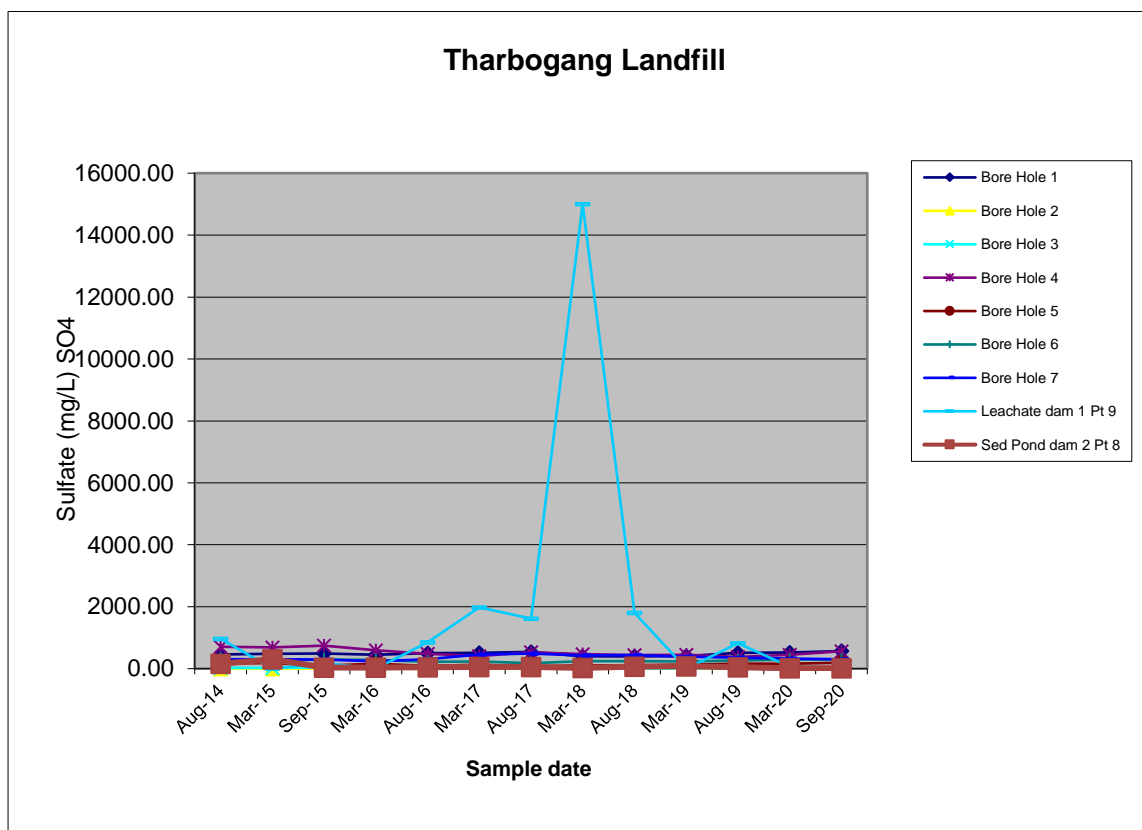


Figure 4.8: Sulphate trends

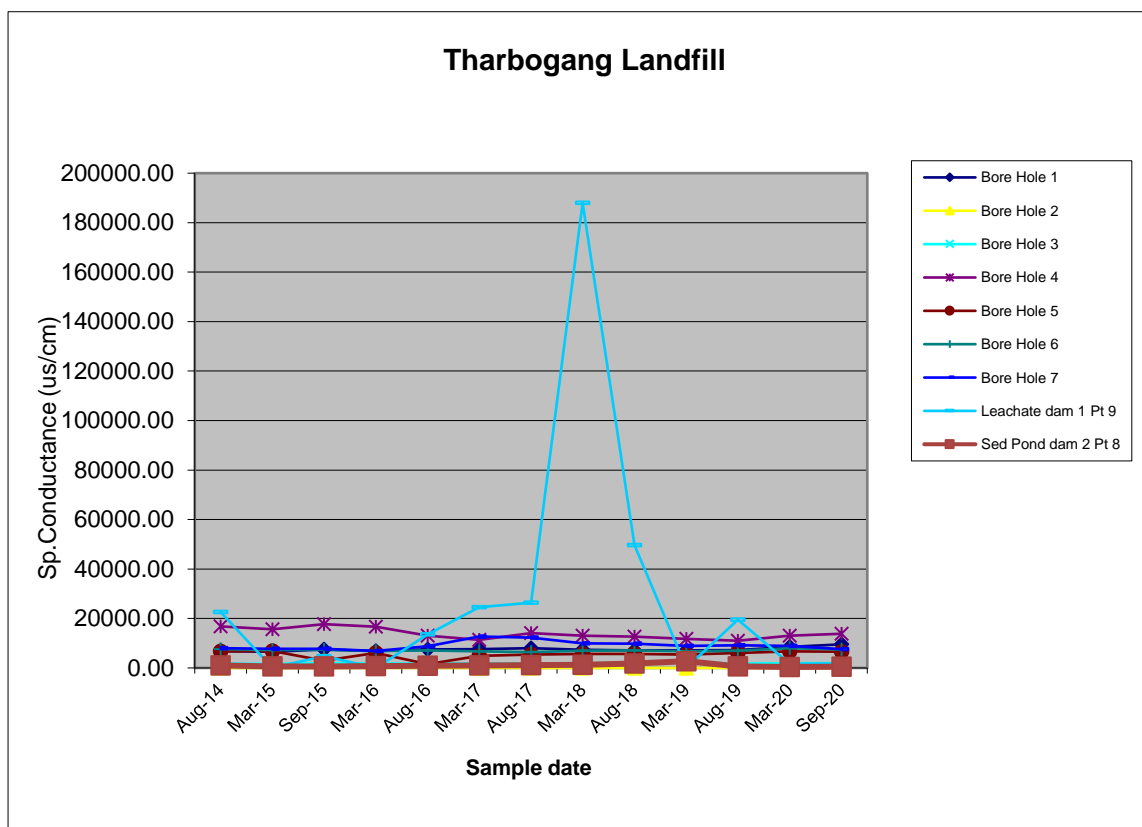


Figure 4.9: Conductivity trends

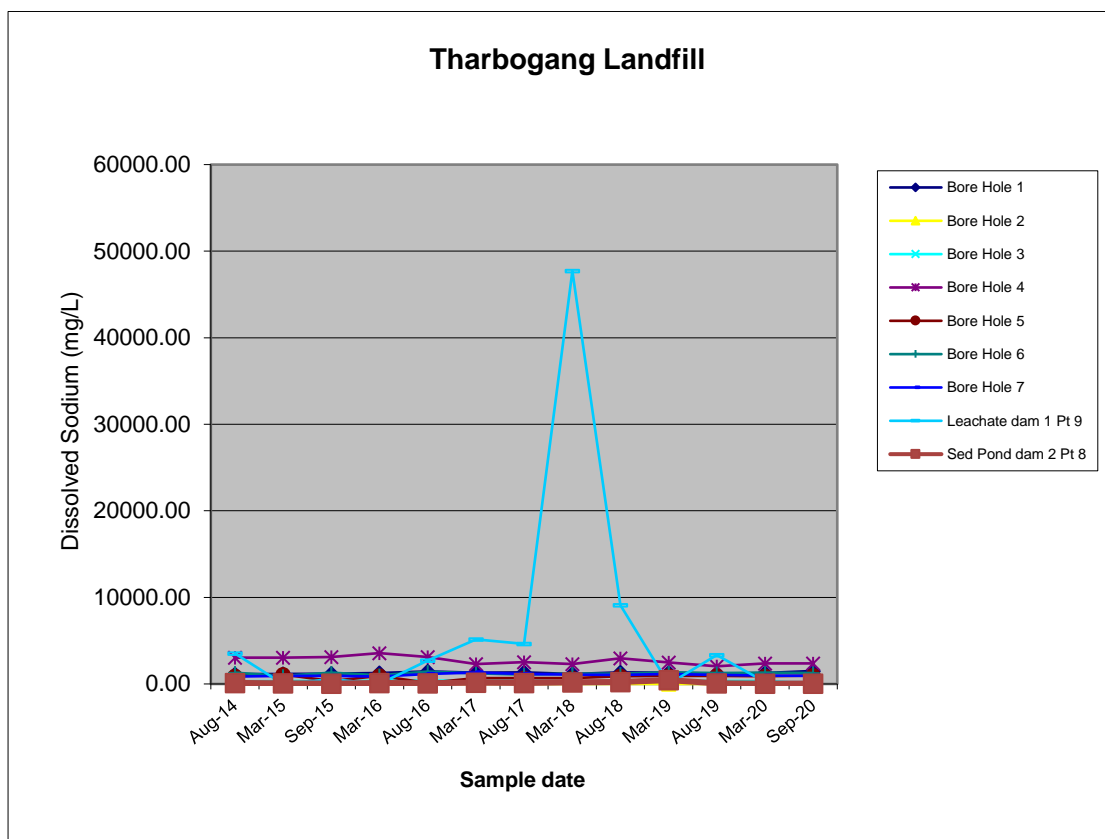


Figure 4.10: Sodium trends

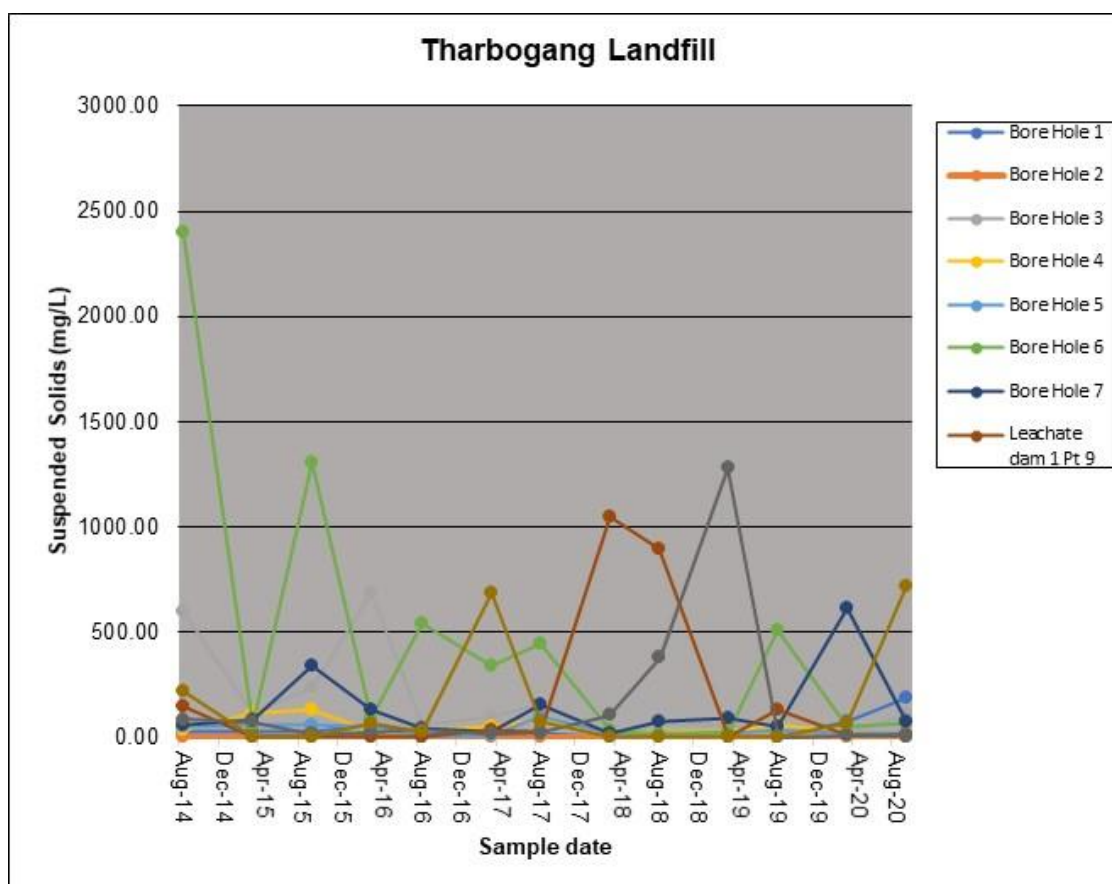


Figure 4.11: Suspended solids (mg/L) for all sites since August 2014 (taken from Stygoecologia 2019)

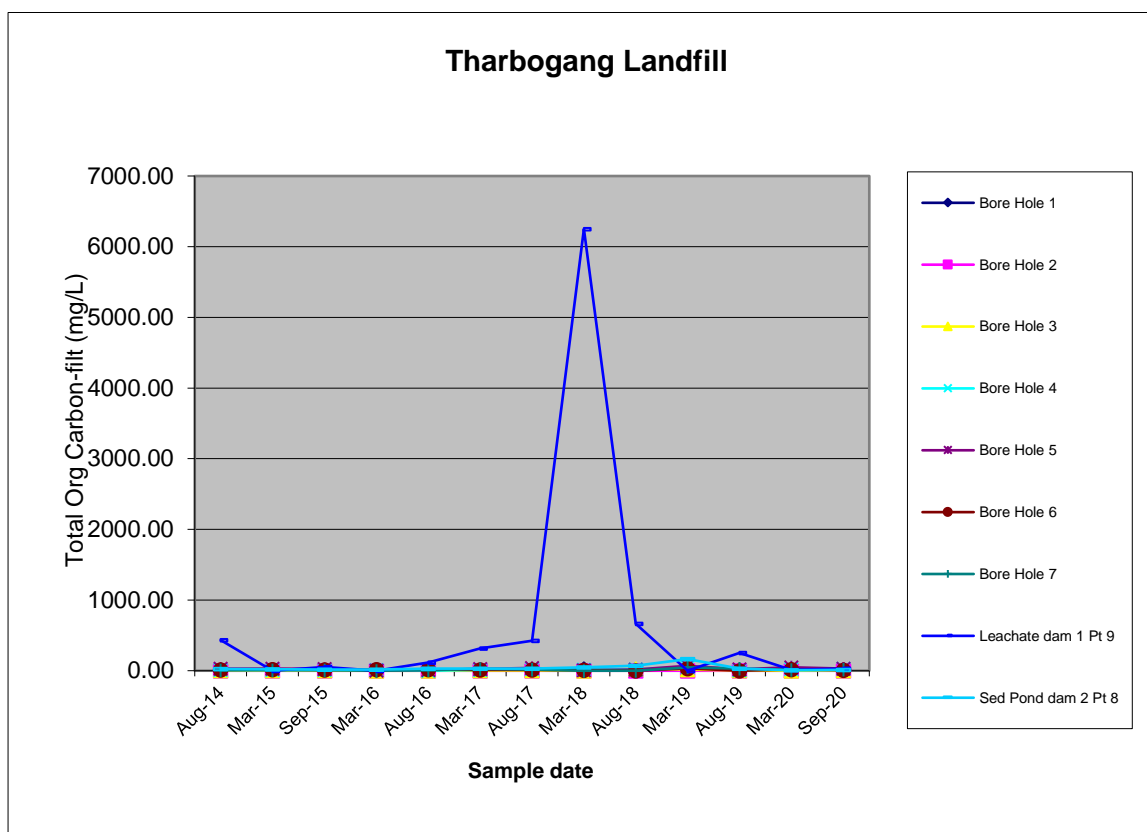


Figure 4.12: Total organic carbon (TOC) trends

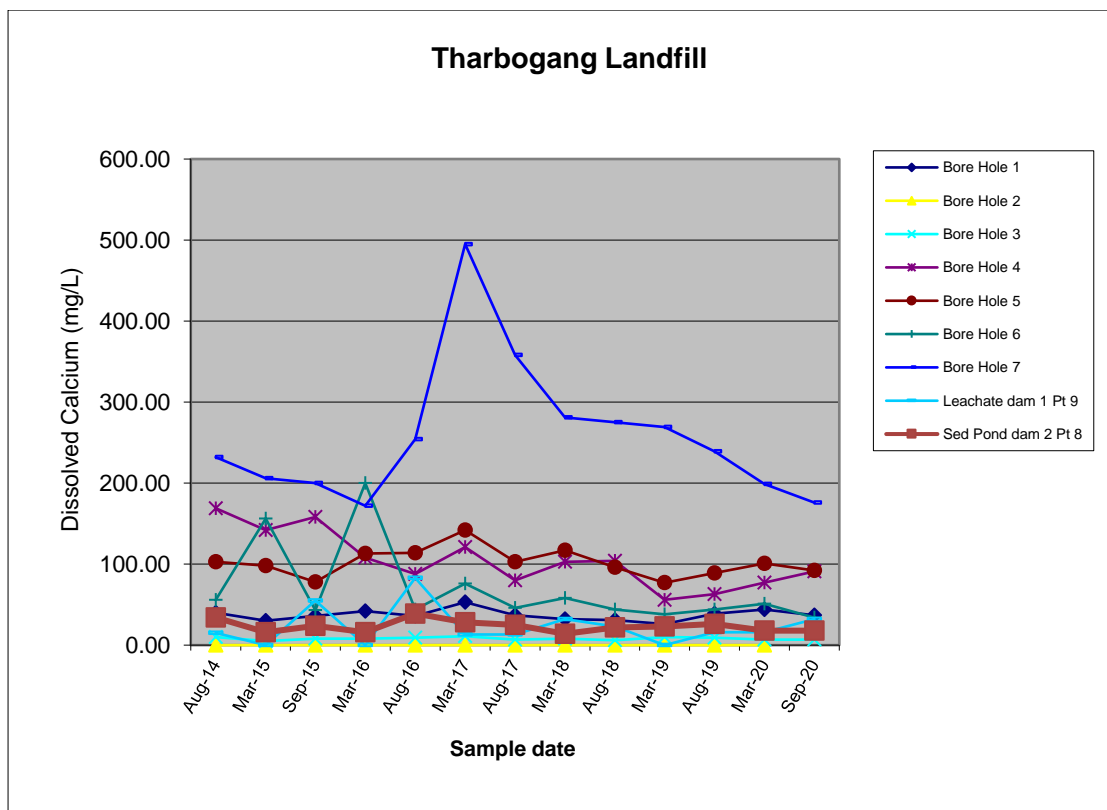


Figure 4.13: Dissolved calcium trends

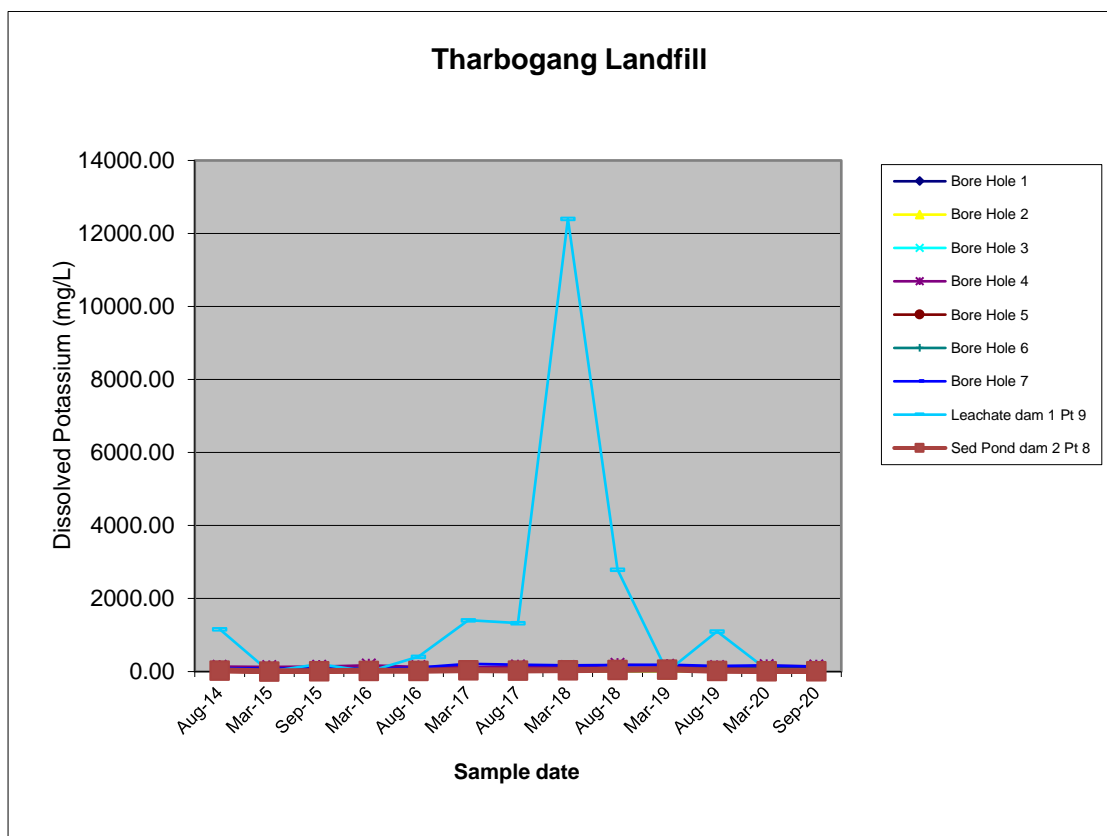


Figure 4.14: Potassium trends

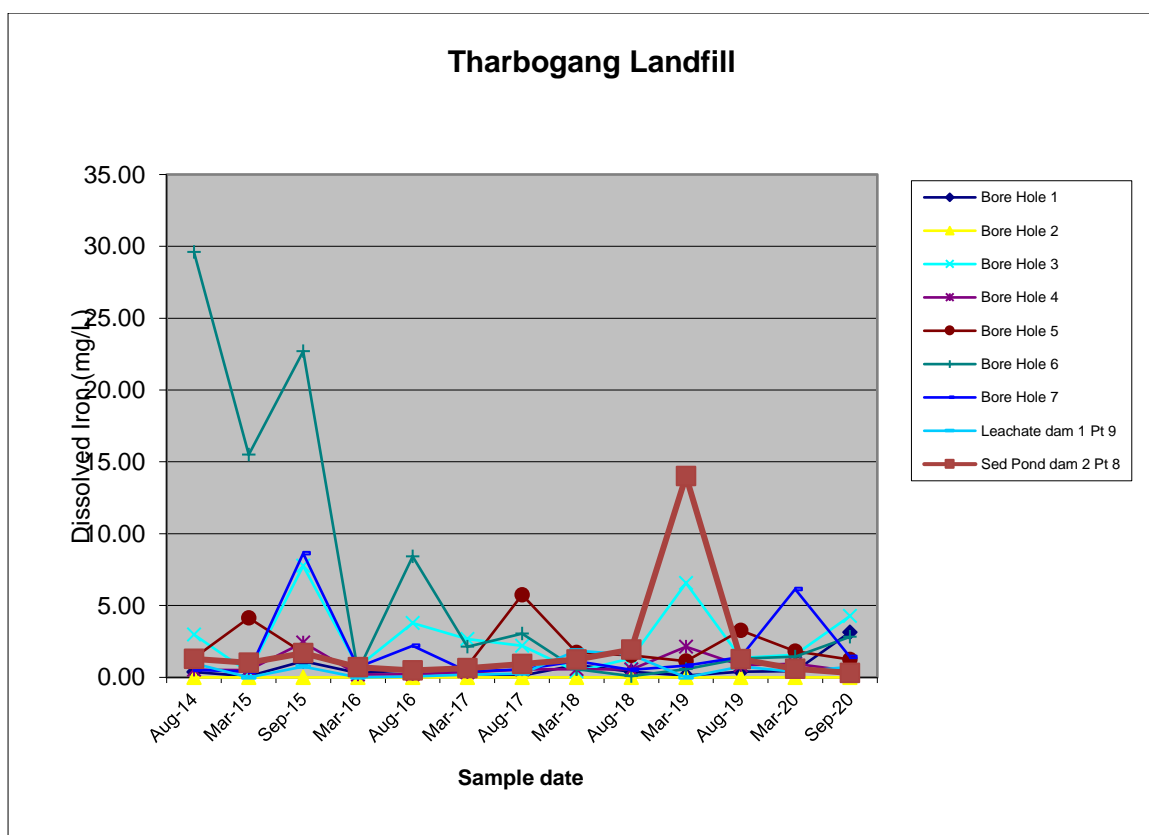


Figure 4.15: Iron trends

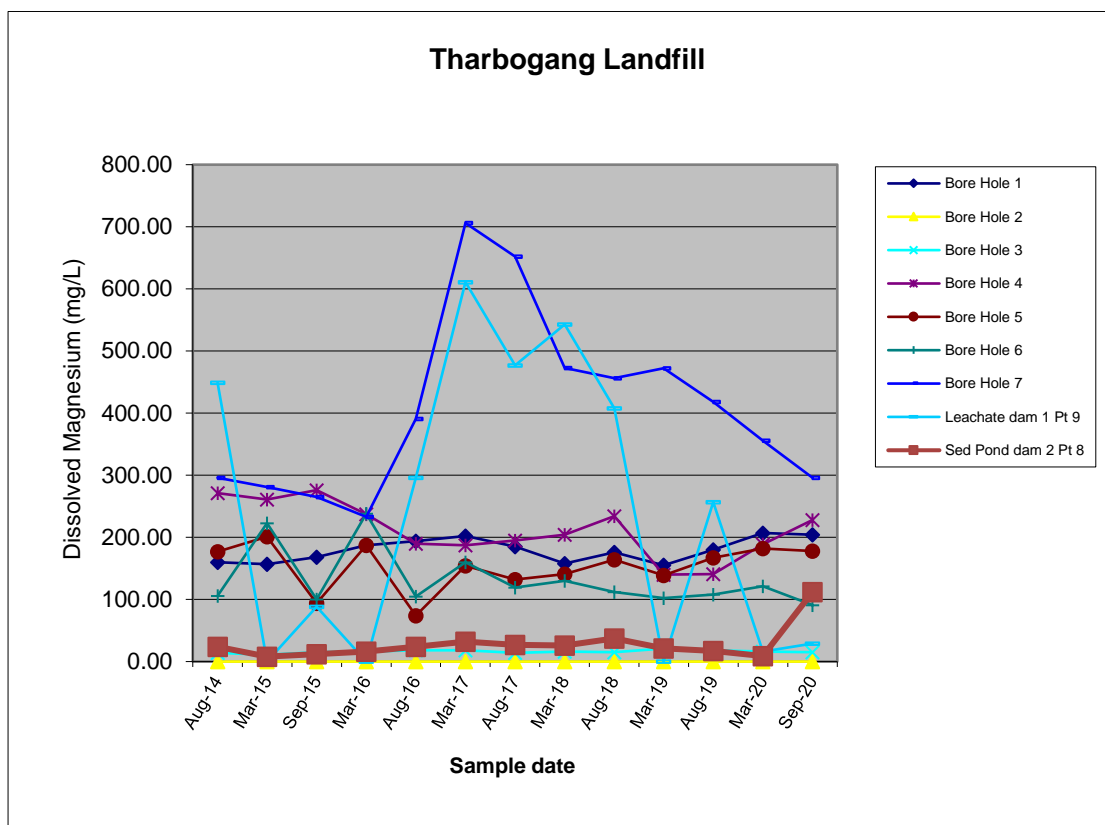


Figure 4.16: Magnesium trends

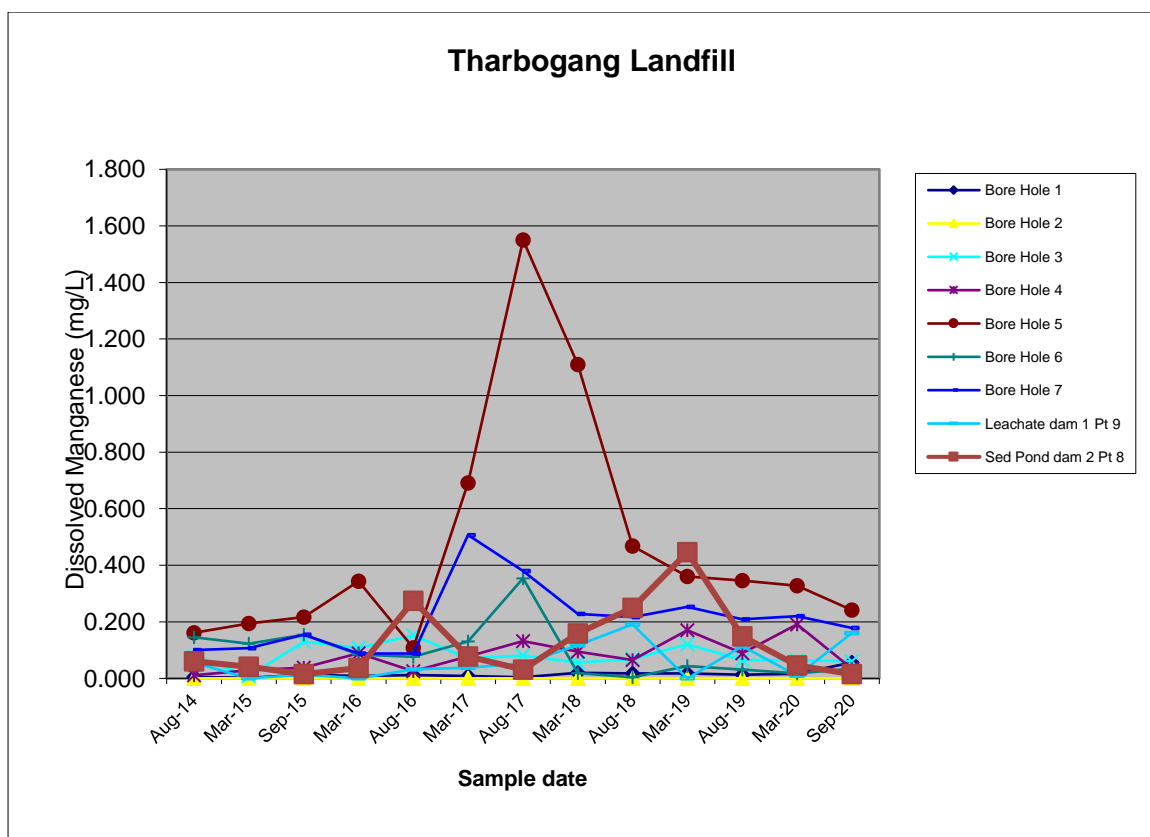


Figure 4.17: Manganese trends

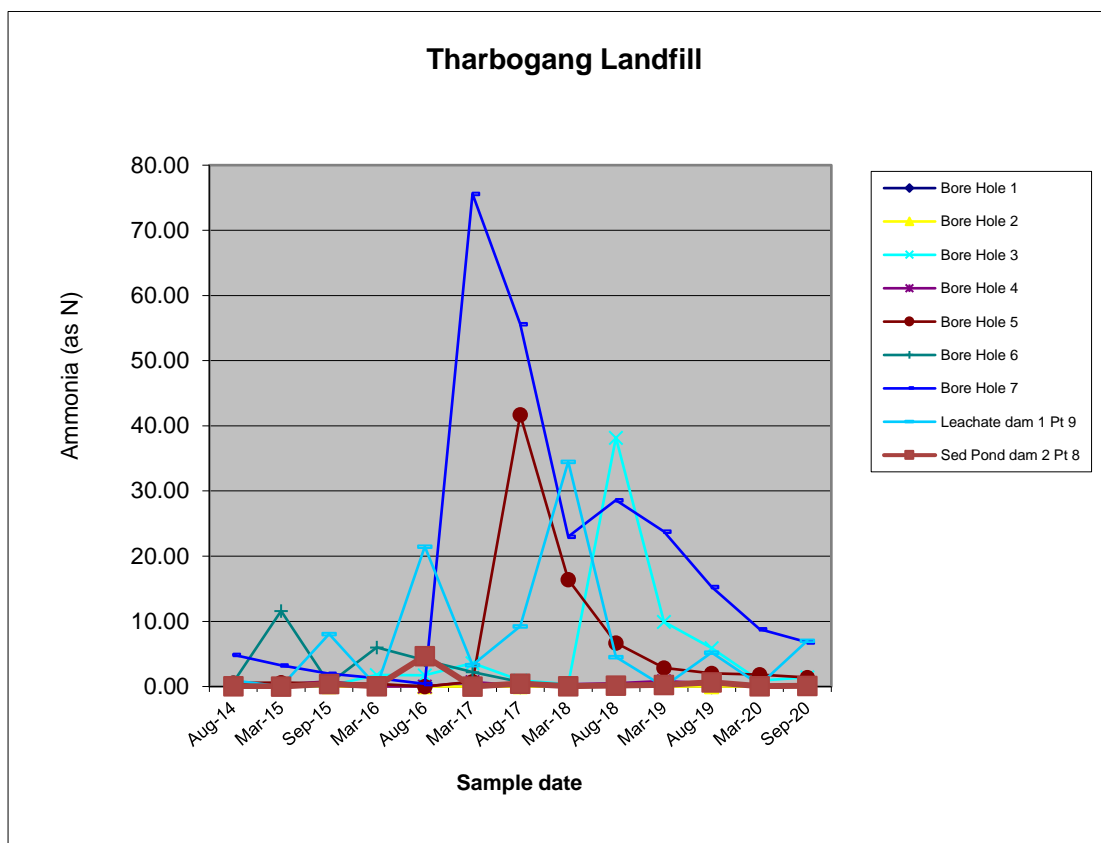


Figure 4.18: Ammonia trends

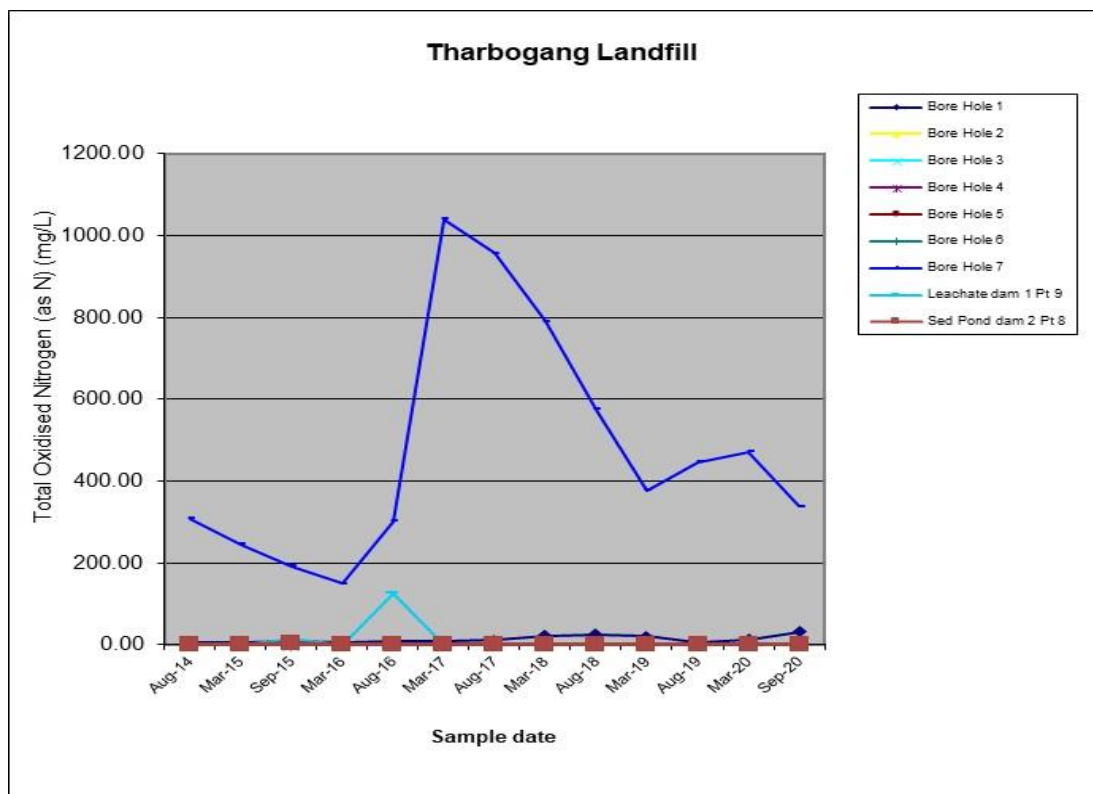


Figure 4.19: Total oxidised Nitrogen (as N mg/L)

4.6.3 Review

An assessment of the monitoring results against the regulatory framework is presented in **Table 4.13**.

Table 4.13: Groundwater compliance assessment

Condition	Review
Project Approval	
Condition 20-26, Schedule 3	A Soil, Water and Leachate Management Plan has been developed.
EPL	
P1.1	Monitoring of EPA points 1, 3-7 and dams 8 and 9 was completed in March and September 2020.
L1.1	No pollution of waters under the POEO Act has occurred.
M1	<p>Monitoring results have been recorded and retained correctly.</p> <p>All records are legible and the date, time, location and person collecting have been recorded.</p> <p>The Sample Receipt Notification and Chain of Custody for all samples are saved in Council's document management system.</p> <p>All six boreholes at Tharbogang Waste Management Centre were sampled twice as per EPL requirements on:</p> <ul style="list-style-type: none"> 19th of March 2020; 25th of September 2020.
M2	All required pollutants have been monitored.
M3	<p>No indication as to whether monitoring followed the Approved Methods Publication.</p> <p>The EPA (2019) was concerned that the method of analyses used by the contract laboratory is not compliant with the approved methods.</p> <p>Council has advised that testing is carried out by Council staff with suitable water and ground water sampling experience and the Contactor (Australian Laboratory Services) who analyses the groundwater samples has had their analysis techniques approved by the EPA.</p>
EA	
A	No new boreholes have been installed in the past 10 years. However, a hydrogeological investigation carried out by Geolyse (2015) concluded that <i>installation of additional piezometers and/or implementing a more rigorous groundwater monitoring program to (a) replace non-viable monitoring location BH2, and/or (b) demarcate the extent of non-delineated impacts (known or potential), is not considered necessary.</i>

C	A Groundwater Monitoring Program has been included in the Soil, Water and Leachate Management Plan.
Not Triggered	
B	No new bores have been required in accordance with the Hydrogeological Investigation carried out by Geolyse in 2015
D	Not applicable at this stage.

The site appears to be largely compliant regarding all aspects relevant to the licence conditions above. Assessment of the monitoring data shows that borehole 2 was dry over the entire assessment period.

A hydrological investigation was carried out by Geolyse in 2015 which, amongst other things, undertook a comparison of analyte concentrations from Boreholes upgradient of the landfill footprint with corresponding concentrations at downgradient Boreholes and assessing for increasing or decreasing trends in contaminant concentrations.

No additional boreholes have been installed. However, the hydrological investigation carried out by Geolyse (2015) concluded that *installation of additional piezometers and/or implementing a more rigorous groundwater monitoring program to (a) replace non-viable monitoring location BH2, and/or (b) demarcate the extent of nondelineated impacts (known or potential), is not considered necessary.* It further concluded that based on the groundwater flow direction at the site's downgradient boundary tending towards the north, it is considered unlikely that groundwater impacts from Tharbogang WMC would be adversely affecting the groundwater quality of Tharbogang Swamp.

Geolyse (2015) recommended *the current biannual groundwater monitoring programme be continued at the site to continue to assess for adverse impacts to groundwater quality. Inclusion of TPH/TRH in the groundwater monitoring parameters as a discrete event may allow for better characterisation of such impacts, however long-term TPH/TRH monitoring is not considered to be necessary (unless significantly elevated concentrations are identified).*

Geolyse (2015) report concluded that *the existing groundwater monitoring programme and network at the site satisfactorily characterises groundwater impacts at the site that may be attributable to landfilling activities.*

A subsequent study was undertaken by Stygoecologia (2019) with the following key findings:

- It is suggested there is little to no connection between the leachate dam waters and groundwaters at these locations
- Many of the spikes could be attributed to what Stygoecologia (2019) determined to be natural background levels within the groundwater at these sites due to the higher clay content of the substrate or in some cases rainfall events.
- Many sites were above ANZECC guidelines for a number of analytes, although in most cases this was attributed to natural background levels.
- The elevated ammonia result was attributed to the fact that the highest values were recorded at Bore 7, which is geographically isolated from the leachate dam or other sewage discharge locations and is directly adjacent to the Green Waste

area, indicating that the rainfall event is likely to have stimulated overland flow that contained high levels of ammonia or fertilisers and potentially entered the bore from the surface (Stygoecologia 2019).

4.7 Leachate

4.7.1 Monitoring and management criteria

Leachate criteria is provided by the PA, EPL and EA. The PA provides criteria for the collection and management of leachate (Condition 18, Schedule 3). The proponent shall:

- a) Install a leachate barrier system on any surface to be use for the direct impoundment of leachate;
- b) Ensure that this leachate barrier system:
 - a. has a re-compacted clay or modified soil layer that is at least 600 mm thick and has in situ coefficient of permeability of less than 1×10^{-9} m/s, or some other suitable liner approved by DECCW; and
 - b. drain to the leachate dams as a minimum gradient of 0.5%.
- c) Collect all leachate in the leachate dams to prevent it from escaping from the site to surface water, ground water or subsoil.
- d) Treat all water from waste storage or handling areas, including any organic waste storage area, or that has been in contaminated by leachate, as leachate;
- e) Ensure that the leachate storage dams:
 - a. Are capable of accepting leachate generated in a 1 in 100 year, 72 hour duration storm event without overflowing;
 - b. Have a re-compacted clay or modified soil layer that is at least 900 mm thick and in situ coefficient of permeability of less than 1×10^{-9} m/s, or, some other suitable liner approved by DECCW;
- f) Are constructed to the satisfaction of the DG.

Additionally, as with surface and groundwater, the PA recommends that a Soil, Water and Leachate Management Plan must be prepared and implemented, which must include a site water balance, erosion and sediment control plan, stormwater management scheme, surface water monitoring program and surface water response plan (Condition 20-26, Schedule 3).

The EPL provides several performance criteria for leachate management.

- A leachate collection system must be installed on each surface within the premises to be used for the disposal of waste (O6.1),
- The leachate collection system must be capable of capturing all leachate generated from the waste disposed of at the premises (O6.2),
- Surface waters must be diverted away from any area where waste is being or has been landfilled (O6.3),
- A leachate barrier system must be installed on each surface within the premises to be used for the storage of leachate (O6.4),
- There must be no discharge of leachate to waters (O6.5), and
- Requirement to monitor concentration of pollutants discharged (M2.1), following the Water/Land Monitoring Requirements (M2.2).

The EA statement of commitments requires the following:

- Construct a leachate collection system with appropriate holding pond and/or tanks to divert leachate back to landfill (A),
- Install high level alarm to the leachate pond interlocked with the drainage system to prevent overfilling (B),
- Install monitoring and alarm system to detect possible failures in the leachate collection system (C), and
- Establish assessment procedures to determine extent of leachate system failure (D).

Griffith City Council has prepared a management plan for Leachate: *Tharbogang Waste Management Centre: Soil, Water & Leachate Management Plan (v2.0)*.

4.7.2 Results

Leachate monitoring has been completed for monitoring point 9 under the EPL. Monitoring results are presented with groundwater data in **Section 4.5.2**. All leachate is contained on site and is left untreated on site to evaporate.

Details of the installation of the retrofit leachate collection in January 2002 has been provided (SMEC 2002). Griffith City Council has also provided the *Leachate Well Pump Investigation* document as supporting evidence of the completion of the leachate collection (GCC 2019).

Leachate from the unlined landfill collects at the eastern edge of the cell in a gravel filled cut-off trench which is connected to a 2m deep sump with inspection chamber formed from concrete rings. The cut-off trench is 1m deep, 2m wide and 50-60m long with a 1% fall to the sump. An additional leachate collector drain has been installed in the northern portion of the active cell. The drain falls to the eastern edge of the landfill where passes under the existing access road to enter the leachate evaporation ponds (Talis 2019).

Both leachate drains operate under the influence of gravity.

Leachate is managed by three evaporation ponds to the east of the landfill. GCC are currently considering the installation of a leachate sprinkler system to enhance evaporation rates and manage periods of high leachate production without the need to construct additional leachate pond capacity (Talis 2019).

Griffith City Council has prepared a management plan for Leachate: *Tharbogang Waste Management Centre: Soil, Water & Leachate Management Plan (v2.0)*.

4.7.3 Review

An assessment of the monitoring results against the regulatory framework is presented in **Table 4.14**.

Table 4.14: Leachate compliance assessment

Condition	Review
Project Approval	
Condition 18, Schedule 3 (a)	The Soil, Water and Leachate Management Plan assumes that the landfill profile has these characteristics.
Condition 18, Schedule 3 (b)	Installation of the retrofit leachate collection has been completed (SMEC 2002).
Condition 18, Schedule 3 (c)	All leachate generated by the site is contained within the leachate ponds. However, the EPA audit (2019) noted that the leachate pump and discharge point into the leachate dam was not function or obstructed. Council has confirmed that all leachate is still captured and stored in the main leachate pond where it is left to evaporate and the leachate pump and discharge point into the leachate dam is not obstructed.
Condition 18, Schedule 3 (d)	All stormwater runoff from the landfill and Green Waste Site is contained in the leachate pond.
Condition 18, Schedule 3 (e)	Leachate storage dams are designed to cater for a 1 in 100 year, 72 hour storm event. The EPA is concerned that the rill and gulley erosion observed on the walls of the leachate dam and the growth of vegetation is likely to compromise the present permeability of the leachate dam's base and banks increasing the likelihood of the leachate pond being breached and unable to contain a design storm event (EPA 2019).
Condition 20-26, Schedule 3	A Soil, Water and Leachate Management Plan has been developed.
EPL	
O6.5	All leachate is contained on site. No leachate is discharged. Leachate generated is contained and natural evaporation takes place.
O6.1	Leachate storage dams have been installed.
O6.2	Storage dams are designed to cater for a 1 in 100 year, 72 hour storm event. The leachate capture system has undergone a full redesign process. Council have just completed the final peer review of the new design plans and they are currently back with the designers. Council hopes this process will hopefully be finished soon.
O6.3	No surface water which falls on site leaves the site.

Condition	Review
	Whist there are no pumps to divert surface water to the ponds Council has advised that they are not required, as there is sufficient natural flow at all the required stormwater infrastructure which has been formalised so water runs via gravity to the sedimentation pond.
O6.4	Installation of the retrofit leachate collection has been completed (SMEC 2002 and GCC 2019).
O6.5	All leachate is contained on site. No leachate is discharged. Leachate generated is contained and natural evaporation takes place.
M2.1 and M2.2	Monitoring of EPA point 9 was completed in March and August 2018.
EA – Not Triggered	
A	Relates to the new landfill development which has not commenced.
B	Relates to the new landfill development which has not commenced.
C	Relates to the new landfill development which has not commenced.
D	Relates to the new landfill development which has not commenced.

4.8 Meteorological Monitoring

4.8.1 Monitoring and management criteria.

The PA requires that the meteorological station be established and maintained in the vicinity of the development (Condition 27, Schedule 3). The station should monitor rainfall, wind speed and wind direction in accordance with the *Approved Methods for Sampling of Air Pollutants in New South Wales guidelines*. Meteorological monitoring is not addressed in the EPL or EA.

4.8.2 Results

Meteorological monitoring data has been collected from the Griffith Water Reclamation Plant (AMG 6206405.9, 408734.488) for reporting purposes to meet the EPL requirements (**Figure 4.20**). Thirteen monitoring parameters are downloaded from the weather station and averages calculated for each parameter. The following have been included in **Table 4.15**:

- Wind Speed AVG
- AVE Wind Speed Max
- Radiant Heat Max
- Radiant Heat Min
- Radiant Heat AVG
- Daily Air Temperature Min
- Air Temperature Max
- Air Temperature AVG
- Rainfall Data provided from BOM Griffith (75041)

Data is logged at two minute and ten minute intervals. Modelling utilises the ten minute interval. Due to the rain sensor not working the statistical information for rainfall was taken from the Bureau of Meteorology. Results are shown in **Table 4.15**.

Over the reporting period there was 296 mm of rainfall (BOM 2020).

The mean annual rainfall for the Griffith region is 407 mm (BOM, 2020). The annual mean daily evaporation is recorded at 4.8 mm. (Site name: Griffith CSIRO. Site number: 075028) (BOM, 2020). Climatic data of the local area has indicated a rainfall deficit of approximately 110 mm per month. The rainfall over years preceding 2019 demonstrated a declining trend (Ecoplanning 2019). Mean monthly rainfall for September 2019 to September 2020 varied between 27.8 mm (February) and 41.3 mm (October).

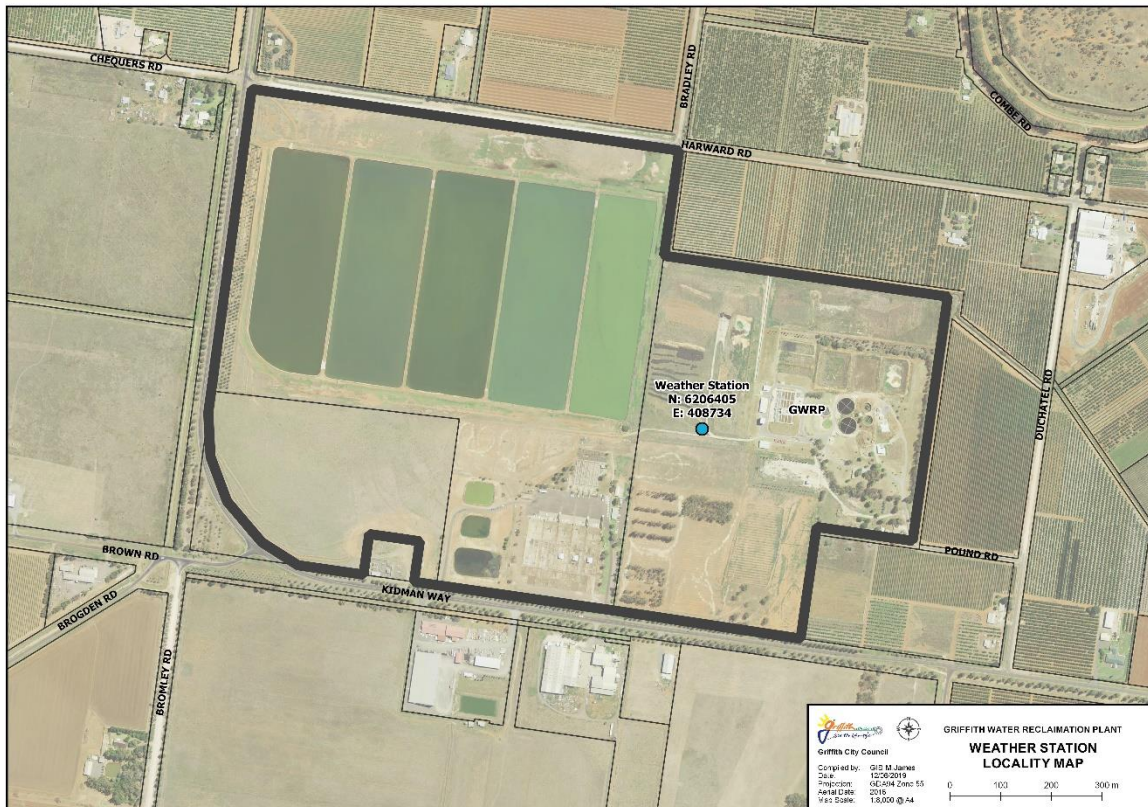


Figure 4.20: GRWP Weather Station Site Map

Table 4.15: Griffith Airport AWS (station 075041)

Parameter	AVG of Wind Speed AVG	AVG Wind Speed Max	Radiant Heat AVG	AVG Daily Air Temperature Min	AVG Air Temperature Max	Air Temperature AVG	Monthly Rainfall Data provided from BOM Griffith (75041)
Month	km/h	km/h	W/m ²	C°	C°	C°	mm
September 2019	25	25	220	6	22	14	0.0
October 2019	27	27	251	9	27	18	1.0
November 2019	32	32	294	12	30.0	21	6.0
December 2019	29	29	284	16	35.0	26	3
January 2020	26	26	274	18	35.0	26.0	4.0
February 2020	25	25	270	18	32	25	13.0
March 2020	21	21	229	14	27	20	10.0
April 2020	23	23	185	10.0	23.0	16.0	57
May 2020	20	20	156	5.0	18.0	11.0	110

Parameter	AVG of Wind Speed AVG	AVG Wind Speed Max	Radiant Heat AVG	AVG Daily Air Temperature Min	AVG Air Temperature Max	Air Temperature AVG	Monthly Rainfall Data provided from BOM Griffith (75041)
Month	km/h	km/h	W/m ²	°C	°C	°C	mm
June 2020	18	18	135	4.0	16.0	11.0	83.0
July 2020	19.0	25.0	129	3.0	17.0	10.0	7
August 2020	25	25	114	4	17.0	10.0	2.0
September 2020	24.0	24.0	161	9	24	16	0.0

4.8.1 Review

An assessment of the monitoring results against the regulatory framework is presented in **Table 4.16**.

Table 4.16: Meteorological monitoring compliance assessment.

Condition	Review
Project Approval	
Condition 27, Schedule 3	Use of the meteorological station as Griffith Water Reclamation Plant was approved by DOP & EPA in September 2011 and data included in this report.

4.9 Noise and vibration

4.9.1 Monitoring and management criteria.

Noise and vibration criteria is provided by the PA, EPL and EA. The PA requires:

- Maximum noise limits must not exceed the noise impact assessment criteria in **Table 4.17** (Condition 28, Schedule 3),
- Continuous improvement of noise impacts and mitigation measures must be undertaken (Condition 39, Schedule 3),
- A Noise and Vibration Plan must be developed and implemented. An annual attended noise monitoring, traffic monitoring, details of how the noise monitoring is to be conducted and a noise monitoring protocol must be included in the Noise and Vibration Plan (Condition 40, Schedule 3).

Table 4.17: PA operational noise impact assessment criteria dB(A).

Location and Locality	Day $L_{Aeq}(15 \text{ min})$	Evening $L_{Aeq}(15 \text{ min})$	Night $L_{Aeq}(15 \text{ min})$
All Surrounding Sensitive Receivers	35	35	35

Noise restrictions under the EPL (L3.1 and 3.2) are presented in **Table 4.18**.

Table 4.18: Noise limits dictated under the ELP.

Day	Time	Limit dB(L_{A10} (15 minute))
Monday - Friday	7am – 6pm	55
Saturday	7am – 1pm	
Monday – Friday	6pm – 10pm	45
All other times	All other times	40

The revised EA mitigation table identified the following mitigation and management commitments for relating to noise and vibration:

- Implement procedures or investigating complaints (A),
- Ensure noise and vibration from quarry operation does not exceed project specific intrusive, amenity, vibration and sound pressure level goals. Noise from the plant should be below 35dB (B),
- Where quarry plant noise is found to exceed the intrusive goal of 35dB ($L_{Aeq,15 \text{ mins}}$) at affected residences, the plant will be moved or modified to ensure the noise impact from the plant is below 35dB ($L_{Aeq,15 \text{ mins}}$) (C),
- Review potential for traffic noise levels once extraction rates exceed 350,000 tpa and scale up (Prior to 2033) (D), and
- Restrict operating hours to 8:30am – 5pm (E).

4.9.2 Results

Noise monitoring of Tharbogang Quarry Operations 18-393 was undertaken by NGH in 2020 using six sensitive receivers in close proximity to quarry operations.

An NGH consultant attended each sensitive receiver location to conduct noise monitoring for 15 minute intervals using a Type 1 sound level meter (Svantek/Svan 957). The sound level meter was positioned between 5 m and 30 m from an external wall of each residential building, mounted on a tripod, with the microphone facing the main noise source(s). Monitoring was conducted three times at each sensitive receiver over three different time periods: morning 8 am – 10:15 am, midday 11:30 – 1:30, and afternoon 2 pm – 6 pm. The afternoon monitoring was completed on the 19th November 2020, with the morning and midday periods being recorded on the 20th November 2020. The landfill site was in operation during the time of the monitoring. The quarry was not operational throughout the survey period (NGH 2020).

A variety of foreground and background noises were audible at the sensitive receiver locations. These noise sources included the sound of wind, garden birds, tractors working in orange orchards, road traffic from Slope Road and Kidman Way, dogs barking, and people talking (NGH 2020b).

The noise impact assessment criteria is 35 dB(A)L_{Aeq} for all times the Quarry and Landfill is operational. Of the 21 monitoring events, 18 exceeded the noise impact assessment criteria (**Table 4.19**). A combination of noise sources contributed to exceedances of the noise assessment criterion including non-related road traffic, dogs barking, cicadas and machinery associated with the orange orchards surrounding all sensitive receivers. Noise from the landfill was not audible from any of the sensitive receivers (NGH 2020b).

The monitored noise level LA_{eq} (15 min) exceeded the assessment criterion of 35 LA_{eq} (15 min) across all monitoring periods, at all sensitive receiver sites. However, it was concluded that it is unlikely that the landfill contributed to monitored noise levels at the sensitive receivers. Machinery movements associated with the Landfill were not audible at any of the sensitive receivers and the quarry was not operational during the monitoring. It was clear that noise from the quarry/landfill was not a key noise contributor at any of the sensitive receiver locations (NGH 2020b).

Activities within quarry pits 101 and 103 have not commenced at the time of reporting. No noise complaints have been received.

Table 4.19: Noise monitoring summary results (taken from NGH Environmental 2020)

Assessment Criteria	Monitored noise levels dB(A)L _{Aeq} (15min)			Distance from facility to receiver (m)
	Morning	Midday	Afternoon	
	35	35	35	
Sensitive receiver 1	41.3	36.6	41.2	1020
Sensitive receiver 2	45.2	39.5	36.4	1300

Assessment Criteria	Monitored noise levels dB(A) $L_{Aeq}(15min)$			Distance from facility to receiver (m)
	Morning	Midday	Afternoon	
	35	35	35	
Sensitive receiver 3	55.8	34.9	49.5	1760
Sensitive receiver 4	40.0	34.2	31.5	1757
Sensitive receiver 5	39.5	52.8	58.5	1020
Sensitive receiver 6	68	41.1	52.9	-
Landfill	43.9	29.9	52.3	100

4.9.3 Review

An assessment of the monitoring results against the regulatory framework is presented in **Table 4.20**.

The noise report concluded that it is unlikely that the landfill contributed to monitored noise levels at the sensitive receivers. Machinery movements associated with the Landfill were not audible at any of the sensitive receivers and the quarry was not operational during the monitoring. It was clear that noise from the quarry/landfill was not a key noise contributor at any of the sensitive receiver locations (NGH 2020b).

Table 4.20: Noise and vibration compliance criteria.

Condition	Review
Project Approval	
Condition 28, Schedule 3	<p>The monitored noise level L_{Aeq} (15 min) exceeded the assessment criterion of 35 L_{Aeq} (15 min) across all monitoring periods, at all sensitive receiver sites. However, it was concluded that it is unlikely that the landfill contributed to monitored noise levels at the sensitive receivers. Machinery movements associated with the Landfill were not audible at any of the sensitive receivers and the quarry was not operational during the monitoring. It was clear that noise from the quarry/landfill was not a key noise contributor at any of the sensitive receiver locations (NGH 2020b).</p> <p>The EPA audit (2019) states that the licensee is to keep copy of chain of custody of all samples taken for auditable records.</p>
Condition 39, Schedule 3	No evidence of continuous improvement is provided. However, the impact of quarry and landfill noise emission was shown to be relatively minor when attenuated for distance (NGH Environmental 2020). The site observations at the sensitive receivers reinforce the notion that the facility noise impact is a minor contributor to ambient noise levels.
Condition 40, Schedule 3	Noise and Vibration Plan has been developed.

Condition	Review
EPL	
L3.1 and L3.2	The monitored noise level LAeq (15 min) exceeded the assessment criterion of 35 LAeq (15 min) across all monitoring periods, at all sensitive receiver sites. However, it was concluded that it is unlikely that the landfill contributed to monitored noise levels at the sensitive receivers. Machinery movements associated with the Landfill were not audible at any of the sensitive receivers and the quarry was not operational during the monitoring. It was clear that noise from the quarry/landfill was not a key noise contributor at any of the sensitive receiver locations (NGH 2020b).
EA	
A	No complaints have been received.
B	The monitored noise level LAeq (15 min) exceeded the assessment criterion of 35 LAeq (15 min) across all monitoring periods, at all sensitive receiver sites. However, it was concluded that it is unlikely that the landfill contributed to monitored noise levels at the sensitive receivers. Machinery movements associated with the Landfill were not audible at any of the sensitive receivers and the quarry was not operational during the monitoring. It was clear that noise from the quarry/landfill was not a key noise contributor at any of the sensitive receiver locations (NGH 2020b). No noise monitoring data has been provided as the quarry operations for Pits 101 and 103 have not commenced.
D	Operating hours are that which is recommended (8:30 – 17:30).
Not Triggered	
C	Not triggered

4.10 Blasting

4.10.1 Monitoring and management criteria

Blasting criteria is provided by the PA and EPL. The PA Compliance Requirements state that the following criteria must be upheld in accordance with the Schedule 3 - Specific Environmental Conditions. Airblast overpressure limits and the ground vibration thresholds must not be exceeded. The following criteria is provided by the PA:

- Blasting must not occur within 200m of privately-owned lands unless suitable arrangements have been arranged (Condition 34, Schedule 3).
- Property inspections are required in which landholders are entitled to a property inspection when the property lies within 500m of the blasting area. The landholders within 500m of the blasting area must be notified of the proposed blasting activities (Condition 35, Schedule 3).
- If a landholder has requested an inspection of their property, a suitably qualified person must undertake the inspection. The process involved in the investigation must be recorded. (Condition 36, Schedule 3).

The preparation and implementation of a Blast Management Plan is required. Continual improvement criteria must be recorded for blasting.

The EPL specifies the overpressure level (L4.1; **Table 4.21**) and ground vibration (L4.2; **Table 4.22**) criteria be met when undertaking blasting. Monitoring equipment should have a cut-off frequency of 2Hz or less. If the equipment has a higher cut-off frequency, then a correction of 5dB should be added. However, no equipment with cut-off frequency exceeding 10Hz should be used to measure Airblast overpressure.

Table 4.21: Airblast overpressure limits specified in the EPL.

Receiver	Airblast overpressure level (dB (Lin Peak))	Allowable exceedance
All Surrounding Sensitive Receivers	115	Must not exceed 5% of the total number of blasts in a 12-month period.
	120	0% - must not exceed at any time.

Table 4.22: Ground vibration criteria from the EPL.

Receiver	Peak particle velocity (mm/s)	Allowable exceedance
All Surrounding Sensitive Receivers	5	Must not exceed 5% of the total number of blasts in a 12-month period
	10	0% - must not exceed at any time.

The EPL (L4.3) also requires that blasting must only be carried out between 9.00 hours and 17.00 hours, Monday to Saturday. Blasting must not take place on Sundays or Public Holidays without prior EPA approval.

The EA revised conditions specify the following mitigation and management measures regarding blasting:

- Blasting airblast overpressure (in dB Linear Peak) and ground vibration peak particulate velocity (in millimetres per second) will be measured for the first three blasts at the nearest affected residence. If these are well within the limited and there are no complaints, then monitoring will be undertaken once per year. The results will be reported to DECCW (A),
- Blasting will only occur between 9:00am-3pm, Monday to Friday excluding public holidays (B), and
- Notify residents within 2 km of intention to blast at least 7 days in advance (C).

4.10.2 Results

No blasting occurred during the 2019 reporting period.

One blast occurred at 1.29pm on 30 September 2020 and evidence of landholder notification is available on the Blast Notice Registration Form. A Blast Monitoring Report was prepared outlining the details of the blast including blast results and Blast Notice Registration Form (GCC 2020a).

Blast Date and Time	Ground Vibration (mm/s)	Over Pressure (dB – Linear)	Compliant
30/09/2020 – 1.59 PM	1.77	108	Yes

4.10.3 Review

The one blast occurred at 1.29pm on 30 September 2020 which is within the designed blasting period for the site.

Table 4.23: Blasting compliance assessment

2019Condition	Review
Project Approval	
Condition 30, Schedule 3	The one blast within the reporting period was within the specified airblast overpressure criteria.
Condition 31, Schedule 3	The one blast within the reporting period was within the specified ground vibration levels.
Condition 32, Schedule 3	The blast occurred at 1.59 pm, which is within the hours specified in the EPL. The EPA was contacted to verify the discrepancy, regarding operation and blasting hours, between the PA and EPL and it was advised that the EPL conditions would apply.
Condition 33, Schedule 3	Only one blast occurred throughout the calendar year (30/9/2020).
Condition 34, Schedule 3	The blast was not within 200m of any privately owned land.
Condition 35, Schedule 3	Not relevant, past 30 November 2010.
Condition 36, Schedule 3	No written requests were made within the reporting period.
Condition 37, Schedule 3	No property damage occurred to any landowner within 500m of blasting.
Condition 38, Schedule 3	A <i>Blast Management Plan</i> has been prepared by Griffith City Council.
Condition 39, Schedule 3	No indication of continuous improvement within the reporting year although it is doubtful that any is required at this stage.
EPL	
L4.1	The one blast within the reporting period was within the specified airblast overpressure criteria.
L4.2	The one blast within the reporting period was within the specified ground vibration levels.

2019Condition	Review
L4.3	The blast occurred at 1.59 pm, within the specified hours of operation.
EA	
A	The one blast within the reporting period was within the specified airblast overpressure criteria. Measurement of two more blasts, when they occur, is required. The one blast within the reporting period was within the specified ground vibration levels. Measurement of two more blasts, when they occur, is required.
B	The blast occurred at 1.59 pm, which is within the specified in the EPL.
C	Residents within 2 km were notified (evidence provided by GCC)

4.11 Air Quality – Dust

A copy of the Air Monitoring Plan (AMP) has not been provided for the AEMR.

4.11.1 Monitoring and management criteria

Air Quality criteria is provided by the PA, EPL and EA. Under the PA (Condition 43, Schedule 3), an Air Quality Monitoring Plan is required to be prepared and implemented. This plan must include details of how air quality performance will be monitored and protocols for compliance evaluation.

Dust monitoring was carried out by Coffey Geotechnics at four sampling points in June 2007 as part of the EA to determine background dust levels. Although the data on background dust levels has not been provided, data for monitoring from September 2018 – September 2020 has been provided with the results shown in **Table 4.26**.

The PA also prescribes air quality criteria which must not be exceeded (Condition 41, Schedule 3), this is listed in **Table 4.24** for particulate matter and **Table 4.25** for dust.

Table 4.24: Impact assessment criteria for particulate matter under the project approval.

Pollutant	Averaging period	Criterion
Total suspended particulate (TSP) matter	Annual	90 µg/m ³
Particulate matter <10 µm (PM ₁₀)	Annual	30 µg/m ³
Particulate matter <10 µm (PM ₁₀)	24 hour	50 µg/m ³

Table 4.25: Long term impact assessment criterion for deposited dust under the project approval

Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level
Deposited dust	Annual	2 g/m ² /month	4 g/m ² /month

The EPL condition O3 specifies that all operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.

The approved methods for the modelling and assessment of air pollutants in NSW has been developed by the EPA (EPA 2016). This document provides the methodology and impact assessment criteria for common pollutants.

Air quality impacts have been assessed by the EA. The following mitigation and monitoring commitments have been made:

- Implement procedures for investigating complaints (A),
- Water cart for dust suppression on unsealed roads (B),
- Water down uncovered stockpiles (C),
- Use water sprayers whenever the crusher is operating (D),
- When 10 minute average wind speed exceeds 30km/hr from the NE quadrant (between 0° and 90°), operation of the quarry will cease or as specified in the Dust Management Plan (E),
- When 10 minute average wind speed exceeds 35km/hr from any direction, operation of the quarry will cease or as specified in the Dust Management Plan (F),
- Preparation and implementation of a Dust Management Plan incorporating dust monitoring (G), and
- Wet down stockpiles as per the dust management plan (H).

4.11.2 Results

Dust and air quality monitoring data for this reporting period is provided below in **Figure 4.21**, **Figure 4.22** and **Table 4.26**. An Air Monitoring Plan has been developed for the site (GHD 2013a) and outlines the air quality criteria. Dust deposition is measured at four locations surrounding the Tharbogang Waste Management Centre (**Figure 4.23**).

It is noted that the application of a monthly average is a derogation from the annual average as specified within the Conditions of Approval and NSW Approved Methods (Northstar Air Quality 2019).

During the 2020 reporting period, all dust monitoring stations exceeded the project specific monthly average criterion of 4 g/m²/month on at least one occasion. Monitoring station 1, 2, and 4 exceeded the maximum in January 2020, station 2 in September to November 2019 and February 2020, and station 2 and 3 exceeded the limit in August 2020.

It should be noted that for the total monitoring period, the yearly average of dust levels was less than the project specific monthly average at all sites.

Total Insoluble Matter (gm) was above the 90 gm threshold at DM02 in October and November 2019 and January and February 2020. DM01 exceeded the trigger value in January 2020 and DM03 in August 2020. For the most part DM04 was within the required range with only a very small deviation of 90.1 in January 2020. Council may wish to consider performing an update to the AQMP, in consultation with the DPI&E, to align the criterion averaging period applied to monitoring data, to that outlined within the CoA (Northstar Air Quality 2019).

Some non-compliance with the air quality thresholds occurred during the monitoring period and a summary of the results is outlined below:

- Total insoluble matter (dust deposited levels) exceeded the project criterion levels at all sites on at least one occasion over the reporting period,
- Total insoluble matter exceeded the project criterion levels at all monitoring stations over the reporting period although DM04 was within range for the most part and with the only exceedance being a 90.1 reading in January 2020,
- At all dust monitoring sites there was at least one month where the maximum increase in deposited dust levels exceeded the 4 g/m²/month threshold. These are indicated in blue in **Table 4.26**,
- At DM02, particulate matter exceeded the monthly 90 µg/m³ threshold over more than one month. Threshold exceedance is indicated in orange in **Table 4.26**.

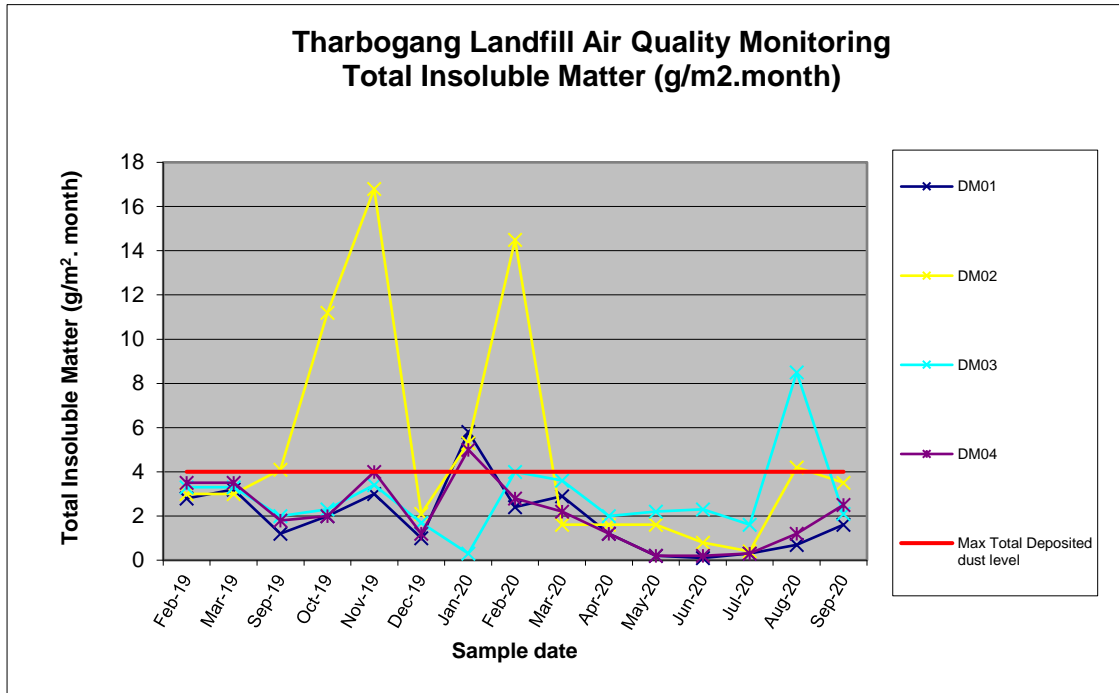


Figure 4.21: Total insoluble matter (g/m².month) (deposited dust level)

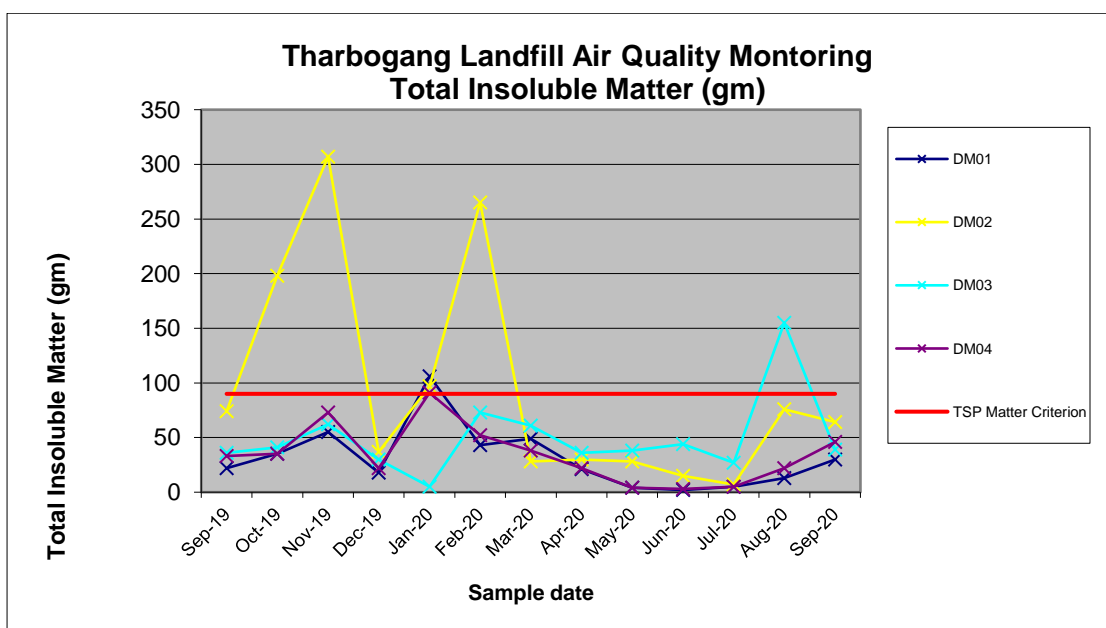


Figure 4.22: Total insoluble matter (gm) (TSP Matter)

Table 4.26: Dust and air quality monitoring results

Total Insoluble Matter (g/m 2.month)																											
	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	
DM01	3.1	2.8	6.1	2.5	4.4	2.8	3.2	2.7	0.5	0.3	0.9	0.8	1.2	2.0	3.0	1.0	5.8	2.4	2.9	1.2	0.2	0.1	0.3	0.7	1.6	0.8	
DM02	8.70	2.2	5.10	3.40	2.80	3.0	3.0	3.0	1.5	0.7	3.2	1.5	4.1	11.2	16.8	2.1	5.3	14.5	1.6	1.6	1.6	0.8	0.4	4.2	3.5	1.8	
DM03	4.3	7.5	6.2	3.9	2.6	3.3	3.3	3.2	0.5	0.3	5.8	1.9	2.0	2.3	3.4	1.7	0.3	4.0	3.6	2.0	2.2	2.3	1.6	8.5	2.1	1.2	
DM04	2.3	2.3	7.0	2.5	4.3	3.5	3.5	3.3	0.7	4.3	2.3	1.4	1.8	2.0	4.0	1.2	5.0	2.8	2.2	1.2	0.2	0.2	0.3	1.2	2.5	1.3	
Max Total Deposited dust level	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	
Total Insoluble Matter (gm)	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	
DM01	50	55	111	42.0	85	47	52	50	9	5	16	14	22	35	55	18	106	43	49	21	4	2	5	13	30	15.00	
DM02	138.00	42	94.00	56.00	55.00	51.00	49.00	57.00	26.00	12.00	57.00	27.00	74.00	198.00	307.00	37.00	97.00	265.00	28.00	30.00	28.00	15.00	7.00	76.00	64.00	31.00	
DM03	69.00	146	114.00	64.00	95.00	57.00	54.00	61.00	8.00	5.00	103.00	35.00	36.00	41.00	62.00	30.00	5.00	73.00	61.00	36.00	38.00	44.00	27.00	155.00	39.00	21.00	
DM04	36	45	127	41	84	59	58	62	13	79	40	26	33	35	73	22	91	52	38	22	4	3	5	22	46	23.00	
TSP Matter Criterion	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	

Orange and blue indicate thresholds exceeded.

4.11.3 Review

Northstar Air Quality (2019) were commissioned to do a review of the air quality monitoring data between September 2018 and September 2019. The results indicate that at each of the four monitoring locations, exceedances of the project-specific monthly average criterion of 4 g/m²/month have been measured. Similar results were recorded during the 2020 reporting period despite **Table 4.27** indicating that sufficient measures are in place to record and reduce dust emissions.

An assessment of the monitoring results against the regulatory framework is presented in **Table 4.27**.

Table 4.27: Dust compliance assessment.

Condition	Review
Project Approval	
Condition 43, schedule 3	An Air Monitoring Plan has been developed for TWMC (GHD 2013a).
Condition 41, schedule 3	Air quality monitoring commenced in September 2018
EPL	
O3	Dust mitigation activities are considered in the Air Monitoring Plan (GHD 2013a).
EA	
A	Procedures for investigating complaints are considered in Section 3 . No complaints have been received during the reporting period.
B	Water carts are in use for dust suppression on unsealed roads. Operations cease when weather conditions cause low visibility.
C	When gravel stockpiles are being disturbed (loading from or adding to) the quarry operator runs the sprinklers to reduce the dust.
D	A sprinkler system is in use when the crusher is operating.
E	Average wind speed management measures and monitoring protocol are included in the Air Monitoring Plan (GHD 2013a) and meet the EA criteria.
F	Average wind speed management measures and monitoring protocol are included in the Air Monitoring Plan (GHD 2013a) and meet the EA criteria.
G	Air Monitoring Plan has been prepared by GHD (2013a).
H	A sprinkler system and water carts are in use.

4.12 Odour (Air Quality)

4.12.1 Monitoring and management criteria

Odour criteria is provided by the PA. The PA (Condition 42, Schedule 3) requires that odour complies with section 129 of the *POEO Act* unless expressly provided in the EPL. Under this Act, no emission of any offensive odour must come from the premises where the licence applies. However, odour emissions are permitted provided they are in accordance with the conditions of the licence or that the only persons affected are workers on site. This is designed to minimise the nuisance effect to acceptable levels.

The EA has recommended that the site conduct odour modelling in the event of a complaint / incident (A).

4.12.2 Results

No odour monitoring data was provided for the reporting period. An Odour Impact Assessment Study was completed in 2007 by The Odour Unit Pty Ltd. This assessment conducted odour modelling.

4.12.3 Review

No further assessment was completed as no odour monitoring was completed. The legislative criteria addressed by the PA is assessed in **Table 4.28**.

Table 4.28: Odour (air quality) compliance assessment.

Condition	Review
Project Approval	
Condition 42, Schedule 3	No odour monitoring data has been provided. However, no complaints have been made regarding odour in the reporting period.
EA	
A	Odour Modelling has been completed in an Odour Impact Assessment Study.

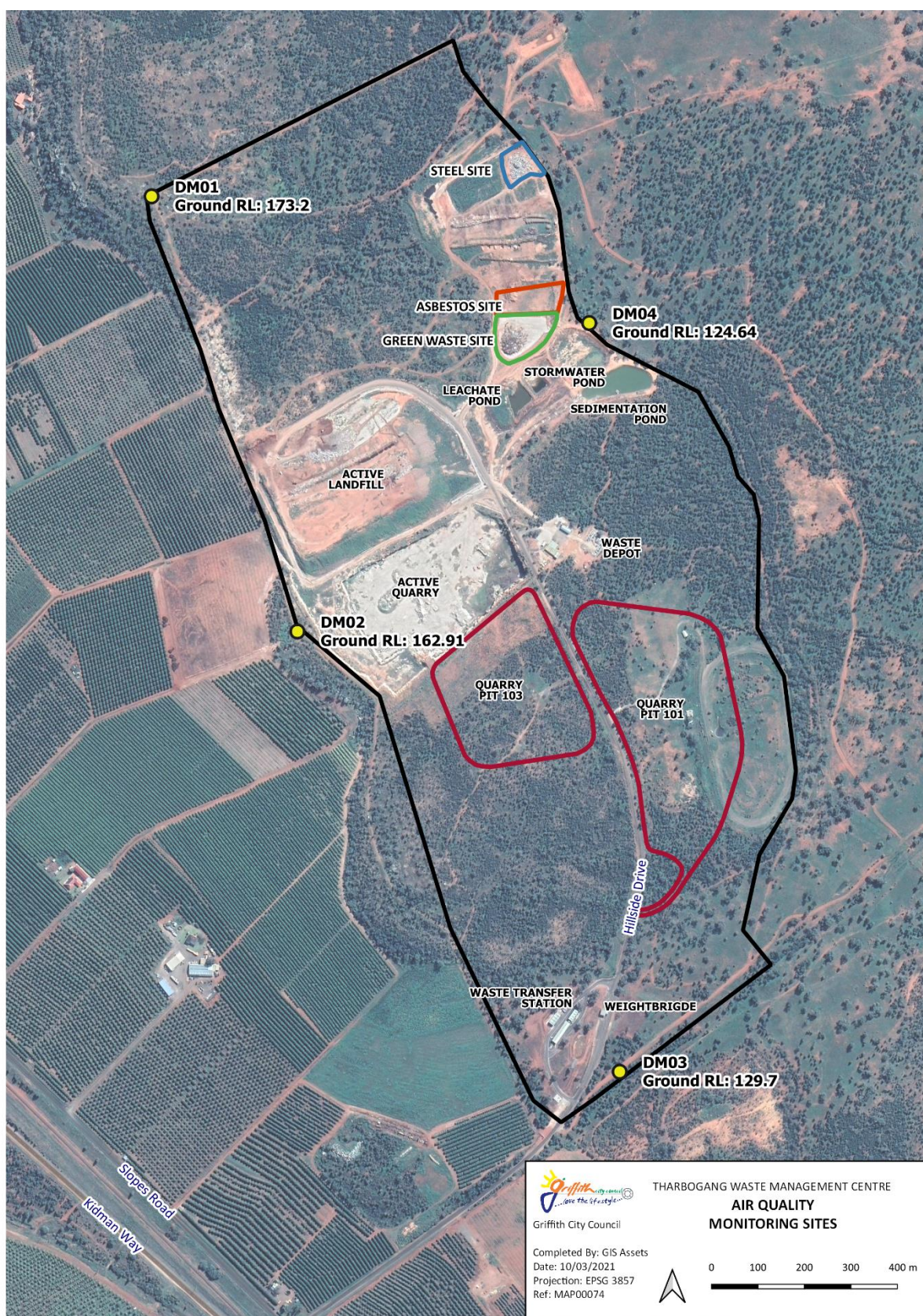


Figure 4.23: Air Quality Monitoring Locations (monitoring began in 2018)

4.13 Greenhouse Gas Emissions

4.13.1 Monitoring and management criteria

Greenhouse Gas Emissions are emitted from the landfill site. The relevant criteria are provided by the PA and EA. Landfill sites are a source of GHG as waste decomposes. Under the PA (Condition 11, Schedule 3), all composting undertaken at the site must be in accordance with *AS 4454-2003: Composts, Soil Conditioners and Mulches, Appendix N, best practice guidelines for Composting Systems*. Utilisation of other composting practices must be approved by the DECCW (now the Department of Planning Industry and the Environment (DPIE)). Additionally, the PA requires that a feasibility report is required to be prepared for within 5 years of the Planning Approval (Condition 12, Schedule 3). This report must outline options to capture and use GHG in the generation of electricity. Feasible options must be considered in this report.

Present and future GHG emissions have been assessed in the EA, the following mitigation and management commitments have been made:

- Capture and flare landfill gases and continuously monitor emissions (A),
- Once data is available, a greenhouse gas target will be set and incorporated into the landfill operational environmental management plan (B),
- Construct and operate waste transfer station to reduce waste to landfill (C), and
- Cover active tip face daily with green waste to improve bioreaction process (D).

4.13.2 Results

No greenhouse gas emission monitoring occurred during the reporting period. No feasibility report for the capture and use of greenhouse gas has been prepared.

4.13.3 Review

No monitoring data has been provided. Consequently, it is not possible to assess the levels of GHG emissions, or, if composting undertaken met *AS 4454-2003*. An assessment of the monitoring results against the regulatory framework is presented in **Table 4.29**. No target has been set and incorporated into the landfill Operational Environmental Management Plan.

Table 4.29: Greenhouse Gas Emissions compliance assessment.

Condition	Review
Project Approval	
Condition 11, Schedule 3	Council has advised that composting will not occur on site.
Condition 12, Schedule 3	No feasibility report has been provided.
EA	
B	No GHG monitoring has been undertaken or a target set.
C	Waste transfer station has been constructed.
Not Triggered	
A	Not triggered at this stage.

Condition	Review
D	Not triggered – landfilling within the existing quarry has not commenced. No information regarding daily tip face cover is provided for current landfill.

4.14 Rehabilitation and Landscape Management

4.14.1 Monitoring and management criteria

Rehabilitation and Landscape management criteria is provided by the PA and EA. The PA has specific requirements for the visual amenity and litter control within 6 months of the date of project approval (Condition 9, Schedule 3):

- Remove existing litter that has accumulated across the site,
- Implement suitable measures to prevent the unnecessary proliferation of litter both on and off site, including the installation and maintenance of a mesh fence not less than 1.8 high around the proposed landfill area, and
- Inspect daily and clear the site (and surrounding area if necessary) of litter on at least a weekly basis.

The PA also requires that a Landscape and Biodiversity Management Plan be prepared and implemented. This plan must be prepared by a suitably qualified person, include a Rehabilitation and Biodiversity Offset Strategy Management Plan and a Long Term Management Strategy (Condition 48, Schedule 3). The Landscape and Biodiversity Management Plan must address the following criteria (Condition 49, schedule 3):

- The rehabilitation objectives for the sites and offset areas;
- A description of the measures that would be implemented to;
 - rehabilitate and stabilise the site,
 - minimise the removal of mature trees,
 - implement the Biodiversity Offset Strategy and
 - manage the remnant vegetation and habitat on the site and in offset areas.
- Detailed performance and completion criteria for the rehabilitation and stabilisation of the site,
- A detailed description of how the performance of the rehabilitation of the quarry areas would be monitored over time to achieve the stated objectives,
- A detailed description of what measures would be implemented to rehabilitate and manage the landscape of the site including
 - the procedures to be implemented for: progressively rehabilitating and stabilising areas disturbed by quarrying,
 - implementing revegetation and regeneration within the disturbance areas, protecting areas outside the disturbance areas,
 - including the biodiversity Offset Strategy areas. Vegetation clearing protocols,
 - including a protocol for clearing any trees containing hollows and the relocation of hollows from felled trees,
 - managing impacts on fauna, in particular threatened species,
 - controlling weeds and pests,

- controlling access,
 - bushfire management and
 - reducing the visual impacts of the projects.
- A description of the potential risks to successful rehabilitation and a description of the contingency measures that would be implemented to mitigate these risks, and
- Details of who is responsible for monitoring, reviewing and implementing the plan.

The EPL states that the licensee must submit to the EPA within three months prior to the last load of waste being landfilled a closure plan in accordance Section 76 of the POEO Act (O6.12).

The PA specifies criteria for the Long Term Management Strategy (Condition 50, Schedule 3), which must:

- Define the objectives and criteria for quarry closure and post-extraction management,
- Be prepared in consultation with DECCW, NOW and DII,
- Describe the measures that would be implemented to minimise or manage the ongoing environmental effects of the projects, and
- Describe how the performance of these measures would be monitored over time.

The need for a rehabilitation bond prior to commencing quarrying operations is specified in condition 51, Schedule 3. This requires that the sum of the bond be \$1/m² for the area to be disturbed. Additionally, within 3 months of each Independent Environmental Audit (IEA), the proponent shall review and if necessary, revise the sum of the rehabilitation bond to the satisfaction of the DG (Condition 52, Schedule 3). This review must consider, inflation, changes to the total area of disturbance and performance of the rehabilitation and revegetation to date.

The visual amenity of the site has been assessed in the EA. The following mitigation and management commitments have been made:

- Erect 2.5 m perimeter fence to prevent windblown rubbish leaving the site (A),
- Ensure rubbish pickup along the fence line and more generally is undertaken regularly (B),
- The landfill will be rehabilitated and revegetated to replicate areas of open grassy woodland (C),
- Construct batters with fissures (offset at each bench) and benches to minimise extent of the cut face. These will mimic natural scarps and reduce the formation of unnatural straight lines (D),
- The benches and floor of the quarries will be revegetated with suitable native species (E),
- Ensure strategic landscaping is incorporated into new residential developments within line of site and in close proximity to the development (F),
- Contaminated soils will be removed and placed in the active putrescible landfill cell (G),
- Soils testing will be conducted down gradient of the landfill, leachate collection system, leachate pond, quarry pits and settlement pond to ensure soil quality remains intact (H),
- Enhance vegetation in edge areas (landfill, roads, quarry edges etc) (I),

- Cover edges with mulch as a temporary measure (J),
- Progressively rehabilitate quarry voids to minimise area of disturbance potential for loss/gain of water accession to groundwater (K),
- Progressively rehabilitate each quarry pit (L), and
- Cap and rehabilitate the landfill on completion (M).

4.14.2 Results

The Closure and Rehabilitation plan was lodged on the 20/12/19. The EPA Landfill technical team required further information regarding slope stability. The Slope Stability Risk Assessment along with the Landfill Closure and Rehabilitation Plan was resubmitted to the EPA Riverina Far West office on the 26/8/20 at 3:59pm (GCC 2020c). The Landfill Closure and Rehabilitation Plan was approved by the EPA on 1 December 2020.

A Landscape and Biodiversity Plan has been developed and implemented (Eco Logical Australia 2011). The Landscape and Biodiversity Management Plan (LBMP) was prepared by ELA in accordance with the Project Approval (dated 8 July 2010) Condition 48 which required the LBMP to be submitted prior to 30 December 2010. The previous LBMP forms the foundation of the BMP that is currently being prepared and that has been revised and updated in accordance with subsequent Section 75J modifications and the Conservation Agreement (Ecoplanning 2021).

The BMP aims to consolidate the biodiversity management actions applying to the site, including referring to separate documents where management actions are addressed in greater detail, in order to provide a comprehensive management document. Biodiversity management actions currently occurring in the offset area (BOAs) under the existing LBMP and the Conservation Agreement (CA).

Table 4.6 (Biodiversity section) outlines the management actions completed for year 5.

The Site disposes 30,409 tonnes (46,785m³) of waste annually (2018/2019 base year) based on a compaction rate of 0.65t/m³ provided by GCC. Based on the final fill profile and the projected annual waste disposal estimates, the remaining void space and estimated lifespan calculated from the 3-D model is as follows:

- Approximate gross void space (m³) – 328,440
- Approximate net void (m³) – 295,596
- Landfilling duration (months) – 55 (4 years & 7 months)
- Estimated date cell becomes full - May 2024 (Talis 2019).

4.14.3 Review

An assessment of the monitoring results against the regulatory framework is presented in **Table 4.30**.

Table 4.30: Rehabilitation and landscape management compliance assessment.

Condition	Review
Project Approval	
Condition 9, Schedule 3	Litter has been removed by staff on site. No indication of daily inspections or weekly litter removal. There is no 1.8m high mesh fence around the active tipping area. Due to the fluid nature of the active tipping area Council uses litter fences as these are mobile and are able to be relocated when the active tipping area changes (GCC 2020c).
Condition 48, Schedule 3	A Landscape and Biodiversity Management Plan has been developed by Eco Logical Australia (2013). This plan covers management implementation for each year up to year 10 and then a more generalised set of management measures for year 10 onwards per year. A BMP has been prepared to consolidate the biodiversity management actions applying to the site, including referring to separate documents where management actions are addressed in greater detail, in order to provide a comprehensive management document. Biodiversity management actions currently occurring in the offset area (BOAs) under the existing LBMP and the Conservation Agreement (CA).
Condition 49, Schedule 3	The Landscape and Biodiversity Management Plan meets the specified criteria.
Condition 50, Schedule 3	The LBMP and BMP outline the Long Term Management Strategy.
Condition 52, Schedule 3	Not relevant. The first IEA was completed after this reporting period.
EPL	
See 'not triggered' section	
EA	
B	No observation of rubbish along fence-lines during the independent audit.
Not Triggered	
Condition 51, Schedule 3	Council has a Waste Reserve which is cash backed, which will cover any rehabilitation works required. Council are currently consulting with the EPA regarding the Post Closure and Rehabilitation Plan. This condition relates to the new quarry and has not been triggered yet
O6.12	Not required until 3 months prior to last load of waste being landfilled. The Landfill Closure and Rehabilitation plan approved by the EPA on 1 December 2020.

Condition	Review
	The Slope Stability Risk Assessment was resubmitted to the EPA Riverina Far West office on the 26/8/20 at 3:59pm and is still being assessed (GCC 2020c).
A	Not triggered - landfilling activities within the existing quarry have not commenced.
C	Not triggered.
D	Not triggered - no information regarding batters with fissures and benches.
E	Not triggered.
F	Not triggered – no new residential developments.
G	Not triggered - no information regarding contaminated soil disposal.
H	Not triggered - no information regarding soils testing.
I	Not triggered - no information regarding edge vegetation.
J	Not triggered - no information regarding mulching.
K	Not triggered – no quarry pits require rehabilitation
L	Not triggered – no quarry pits require rehabilitation.
M	Not triggered – no landfill sites require capping and rehabilitation.

4.15 Heritage

4.15.1 Monitoring and management criteria

Heritage criteria is provided by the PA and EA. The project approval (Condition 53, Schedule 3) requires that a Cultural Heritage Management Plan be prepared and implemented. The plan must be prepared in consultation with the DECCW (now DPIE) and local Aboriginal communities, it must draw on relevant recommendations for management and include descriptions of measures to be implemented.

Heritage impacts of the site and proposed expansion have been investigated in the EA, the following mitigation and management recommendations have been made:

- Implement procedures to investigate and protect culturally significant material if discovered during construction and operation (A),
- Protect and preserve the two surveyor scarred trees and a 20 m exclusion zone maintained around each tree (B), and
- Bluedot Speedway signs will be carefully removed and handed over to the car racing club, reused or displayed at Griffith Pioneer Park Museum. (C)

4.15.2 Results

No information regarding heritage management has been provided for this reporting period other than the Heritage Management Plan (Black Mountain Projects 2013).

There is no evidence of Aboriginal Heritage Cultural Material within the study area. The scarred trees are listed under the Cultural Heritage Management Plan (CHMP) and included in schedule 5 of the Griffith Local Environmental Plan 2014. There is a requirement that 20 exclusion zones be installed around the trees. Council offered the two hand painted Bluedot Speedway signs to Pioneer Park Museum who declined the offer. Therefore, an Expression of Interest was put out and Council has given the signs to an ex member of the Speed Way club who is to restore them and add them to his collection.

4.15.3 Review

The exclusion zones have not been implemented.

A *Cultural Heritage Management Plan* has been provided and meets the criteria specified within the Project Approval. An assessment of the monitoring results against the regulatory framework is presented in **Table 4.31**.

Table 4.31: Heritage compliance assessment.

Condition	Review
Project Approval	
Condition 53, Schedule 3	A Cultural Heritage Management Plan has been developed.
EA	
A	The Cultural Heritage Management Plan recommended exclusion zones
B	Council is currently taking steps to include the two 'scar trees' in the LEP Heritage Plan and large 'do not touch' bands have been put around both scar trees to protect them from contractors who may not know the significance of the trees.
C	Council has given the signs to an ex member of the Speed Way club who is to restore them and add them to his collection.

4.16 Traffic and Transport

4.16.1 Monitoring and management criteria

Traffic and transport criteria are provided by the PA and EA. The PA requires the following:

- A *Transport Management Plan* is prepared and implemented (Condition 54, Schedule 3).
- The upgrade of the Auxiliary Right Turn (AUR) at the intersection of Access Road and Kidman Way within 12 months of operations commencing (Condition 55, Schedule 3),
- Loaded vehicles are covered when travelling to and from the site, and that loaded vehicles are cleaned of materials when leaving the site (Condition 57, Schedule 3),

- A logbook of the traffic movements is kept on site and made available for inspection (Condition 58, Schedule 3).

Traffic volumes and predicted impacts were assessed in the EA. The following mitigation and management procedures were recommended:

- Implement procedures for investigating complaints (A),
- Undertake regular road inspections and any works required will be undertaken in accordance with road and rail design standard applicable at the time (B),
- Compile a Transport Management Plan (C),
- Upgrade auxiliary right turn at the intersection with Kidman Way and ensure that there is no cost to the RMS associated with the development (D), and
- The operator to maintain a logbook of traffic movements (E).

4.16.2 Results

Information on traffic volumes and vehicle types has been provided. Full weighbridge data per calendar year is recorded and include dates, time, truck registration number, product type and individual Gross, Tare and Net weigh for each truck. No evidence of abnormal traffic and/or transport occurred during this reporting period. A *Transport Management Plan* has been produced for the site under condition 54 (Section 3) of the Project Approval (Griffith City Council n.d.).

Upgrades to the intersection of Access Road and Kidman Way occurred in 2012/2013.

4.16.3 Review

The production and implementation of a Transport Management Plan meets the criteria specified for the Project Approval Condition 54. The Auxiliary Right Turn (AUR) has previously been upgraded as per the Project Approval. However, traffic volumes and vehicle types are to be reviewed every five years and no indication of any review has been provided. Additionally, it is not clear if traffic movements have been logged and a record kept on site. An assessment of the monitoring results against the regulatory framework is presented in **Table 4.32**.

Table 4.32: Traffic and transport compliance assessment.

Condition	Review
Project Approval	
Condition 54, Schedule 3	A Transport Management Plan has been developed.
Condition 55, Schedule 3	The AUR turn has been upgraded.
Condition 57, Schedule 3	All loads that enter site must be covered and all gravel loads that leave the weighbridge are covered.
Condition 58, Schedule 3	A logbook of traffic movements, including all weighbridge data per calendar year, has been provided.
EA	
A	Complaints procedures are addressed in Section 3 .

B	Council will start daily inspections in 2021.
C	A Transport Management Plan has been developed.
D	The AUR turn has been upgraded.
E	A logbook of traffic movements, including all weighbridge data per calendar year, has been provided.

4.17 Dangerous goods and hazardous materials management

4.17.1 Monitoring and management criteria

Dangerous good and hazardous materials management criteria is provided by the PA and EA. The management of dangerous goods under PA Condition 19 (Schedule 3) requires that all above ground tanks and vats are stored and handled in accordance with all relevant Australian standards and have a minimum bund volume of 110% of the volume of the largest single stored volume and the DECCW's *Storing and Handling of Liquids: Environmental Protection – Participant Manual*. Additionally, Condition 59 (Schedule 3) requires that the storage, handling and transport of fuels and dangerous goods be conducted in accordance with *Australian Standards AS 1940* and *AS1596*, and the *Dangerous Goods Code*.

EA:

- Construct bunded area of diesel containers (A),
- Store chemical and explosives offsite (B), and
- Install bunding and spill kits in the vicinity of any chemicals or fuels stored or used onsite (C).

4.17.2 Results

A Pollution and Incident Response Management Plan has been development for the site (Griffith City Council 2018a). Dangerous goods and hazardous materials on site are managed via diesel bunds, spill kits and bunding around the storage of chemicals and fuels. Spill kits are located inside the landfill workshop (**Figure 4.24**) and at the waste transfer station (**Figure 4.25**). Diesel fuel is stored in an open location in a self-bunded 4000L storage tank on a concrete bund (**Figure 4.26**). Bunds are also utilised for battery storage and chemical storage (**Figure 4.27** and **Figure 4.28**) on site. Chemicals used on site are stored in coloured and clearly signed cabinets within the landfill workshop (**Figure 4.29**). Additionally, there is a MDS folder kept on site, which contains the technical details (safe handling procedures, spill clean-up and disposal) of all the chemicals which are held on site (**Figure 4.30**).

A ten-year portable fuel station inspection report has been provided by Council, with the inspection undertaken in November 2019. Pass was obtained for all attributes except the tank being earthed and the absence of an emergency stop (B&B Industrial 2019).



Figure 4.24: General purpose spill kit located in the landfill workshop.

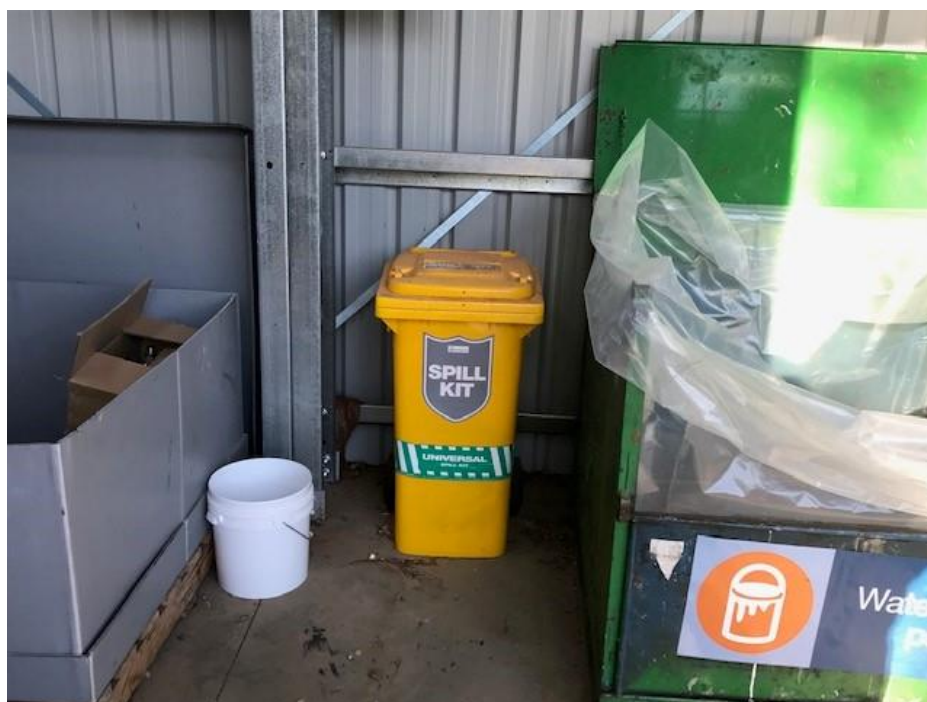


Figure 4.25: Universal spill kit located within the waste transfer station.



Figure 4.26: Concrete diesel fuel bund in an open area.



Figure 4.27: Bund for battery storage in the landfill workshop.



Figure 4.28: Bunded storage shed on site.



Figure 4.29: Chemical storage with signage within the landfill workshop.

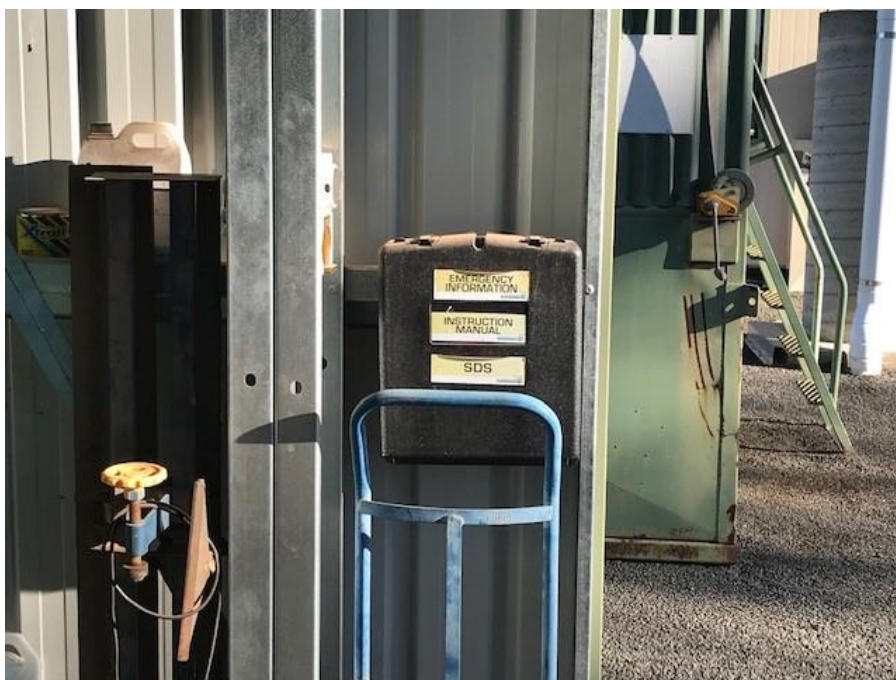


Figure 4.30: MDS folder located on site.

4.17.3 Review

An assessment of the monitoring results against the regulatory framework is presented in **Table 4.33**.

The EPA audit (2019) noted that the licensee must ensure that the diesel fuel tank is maintained in a proper and efficient condition including: sign posted appropriately as dangerous goods and otherwise protected from being compromised by vehicular activity.

Table 4.33: Dangerous goods and hazardous materials compliance assessment.

Condition	Review
Project Approval	
Condition 19, Schedule 3	<p>The management of dangerous goods under PA Condition 19 (Schedule 3) requires that all above ground tanks and vats are stored and handled in accordance with all relevant Australian standards and have a minimum bund volume of 110% of the volume of the largest single stored volume and the DECCW's Storing and Handling of Liquids: Environmental Protection – Participant Manual.</p> <p>Council has confirmed that the current storage of dangerous goods meets the above requirements.</p>
Condition 59, Schedule 3	<p>The photos provided are evidence storage, handling and transport of fuels and dangerous goods is conducted in accordance with AS 1940 and 1596.</p>
EA	

A	The storage and handling of chemicals and fuels, including requirements for bunding and provision of spill kits is met in relation to chemical storage within the WTS and site compound/workshop area.
B	Bunding and spill kits have been installed in the vicinity of any chemical or fuels stored or used onsite.
C	The assessment of chemical management for the existing landfill and quarry was not within the scope of the audit. No information on if there is storage of chemicals and explosives offsite.

4.18 Incident management and response

4.18.1 Monitoring and management criteria

Dangerous good and hazardous materials management criteria is provided by the PA, EPL and EA. Under the PA the following conditions are provided:

- The project shall be kept secure to ensure public safety (Condition 8, Schedule 3),
- Fire management (Condition 60 (b), Schedule 3):
 - Implement suitable measures to minimise the risk of fire on site, including in the landfill area,
 - Extinguish any fires on site promptly,
 - Maintain adequate fire-fighting capacity on site, in consultation with the rural fire service (RFS), including a tanker or water cart, and
 - Assist the RFS and emergency services if safe to do so, if there is a fire on site.

The EPL requires that a formal investigation and reporting of incidents and management response is required for all incidents. The licensee must:

- Have in place and implement fire prevention measures to minimise risk of fire at the premises (O4.1),
- Extinguish fires at the premises as soon as possible (O4.2),
- Implement fire prevention measures at the premises in accordance with the *LEMP Tharbogang Recycling and Waste Disposal Facility* prepared by RE Barton and dated December 1997 (O4.3),
- Annual returns document meets the requirements outlined in R1,
- Notify the EPA of incidents of environmental harm (R2),
- Provide a written report on request by and EPA officer (R3), and
- Record details of the fire (R4) including:
 - Time and date the fire started,
 - Was the fire authorised by the licensee, and if not, the circumstances which ignited the fire,
 - The time and date that the burn was extinguished,
 - The location of the fire,
 - Prevailing weather conditions at the time of the fire.
 - Observations made in regard to smoke direction and dispersion,
 - Amount of waste that was combusted in the fire,
 - Action taken to extinguish the fire, and
 - Action taken to prevent reoccurrence.

Notification of fires must be completed in accordance with condition R2.

The revised EA mitigation and management commitments are as follows:

- Erect fencing above quarry walls (A),
- Develop and implement fire management procedures in consultation with Griffith Fire Control centre, and submit with emergency services (B),
- Develop emergency response and contingency procedures as part of the operational plans (C),
- Public education and additional inspection for prohibited wastes and burning materials (D),
- Reduce tip face and cover daily to reduce risk of ignition from lightning strikes (E),
- Spread green waste in thin layers to minimise risk of self-combustion (F),
- Create vertical and horizontal layers in inert cell with clay to isolate volume of waste prone to a fire event (G),
- Limit access to quarry faces and exposed edges (H),
- Conduct safe work methods statements for potentially hazardous tasks (I),
- Ensure appropriate supervision for personnel for all tasks (J),
- Conduct site induction and periodic refresher training for all employees, contractors and transport contractors (K), and
- Containment spill kit will be kept on site at all times (L).

4.18.2 Results

Three fires occurred at the existing landfill, two in January 2019 and one in March 2019. Council's incident report form was completed. On the forms it was identified that none of the fires were considered a 'notifiable event' as prescribed in Section 35 of the *Work Health and Safety (WHS) Act 2011 (NSW)*.

Fire breaks and/or fire trails have been established in the woodland to the north and north west of the premises as well as to the south of the sedimentation pond and existing quarry (EPA 2019).

The EPA audit (2019) noted *on 27 September 2017 Nearmap records a potential fire or spill event at or around the containment pond (most northerly pond on the premises), resulting in what looks like an oily substance entering the pond area including contained waters. Note the "spill" was not evident on Nearmap in previous years. There had been a fire in the green waste area a couple of weeks before but this incident appears unrelated. A search of incident logs and notifications for evidence of the event was unsuccessful.*

The contamination of a site from a hazardous materials spill of that magnitude (potentially a 200L drum) that could potentially show up in the groundwater should have been reported and PIRMP activated.

4.18.3 Review

The current provided information is insufficient to determine the adequacy of the existing procedures and if they were implemented, or, if licencing conditions were met. The EPA audit (2019) identified a potential non-compliance with regards to reporting pollution incidents to the EPA.

All outer access gates to the Waste Management Site have pad locks on them. The perimeter fence line is kept as a serviceable condition. The perimeter fence line is kept as a serviceable condition. There is no 1.8m high mesh fence around the active tipping area, due to the fluid nature of the active tipping area Council uses litter fences these are mobile and are able to be relocated when the active tipping area changes (GCC unpublished).

All outer access gates are secured and maintained, there is a CCTV system at the Waste Transfer Station, Front Gate and the Weighbridge this is all integrated to a central server. A Landfill Public Access Procedure flow chart has been prepared. The Waste Management Site is secured by the last employee to leave every afternoon (GCC unpublished).

An assessment of the monitoring results against the regulatory framework is presented in **Table 4.34**. The EPA (2019) audit states that once emergency services are notified of an incident including fire, and the licensee's response is initiated, the EPA must be notified of any fire on the premise.

Table 4.34: Incident management and response compliance assessment.

Condition	Review
Project Approval	
Condition 8, schedule 3	The site is secured through fencing, CCTV and padlocked gates to ensure public safety.
Condition 60 (b), schedule 3	All fires on site were controlled and managed in consultation with RFS.
EPL	
O4.1	Current fire prevention measures meet the LEMP (1997) requirements. Independent audit notes that fire trails were regraded in November 2017. The EPA Audit (2019) states that emergency response prevention methods were not undertaken. Council has a PIP Fire for landfill fires and this has been sent to NSW Fire & Rescue and NSW Rural Fire Services. The PIP also makes up part of the response to the PRIMP. Staff have undertaken firefighting training (see WHS records) Council has purchased a designated firefighting water tanker.
O4.2	Consultation with the RFS has not been undertaken to decide the necessary fire-fighting equipment available on site. All fires at the site are extinguished as soon as possible.
O4.3	The landfill has a 10,000L water cart that has a hydraulic pump / spray unit and a 10,000L water tank.
R1	The annual return has been completed as required (GCC 2020c) and it is assumed it will be kept for at least 4 years after it was submitted to the EPA.
R2	The Annual return report states that there were no incidents of environmental harm during the reporting period (GCC 2020c).

Condition	Review
R3	No evidence of written reports submitted to the EPA and would not have been required if there were no environmental harm incidents.
R4	There was no fire in this reporting period (GCC 2020c).
EA	
B	<p>Council has a PIP Fire for landfill fires and this has been sent to NSW Fire & Rescue and NSW Rural Fire Services. The PIP also makes up part of the response to the PRIMP.</p> <p>Staff have undertaken firefighting training (see WHS records)</p> <p>Council has purchased a designated firefighting water tanker. The landfill has on site a 5,000L water cart that has a hydraulic pump/spray unit. The landfill operations staff can also call on the Rural Fire Service and other council plant available, if required.</p> <p>The Rural Fire Service responds to any landfill fires and other council departments provide resources when required.</p>
C	<p>The 'Procedures in the Event of a Fire at the Landfill (WM-PR-016)' were approved 8 February 2017. They do not specifically cover a fire at the WTS.</p> <p>Council has a PIP Fire for landfill fires and this has been sent to NSW Fire & Rescue and NSW Rural Fire Services. The PIP also makes up part of the response to the PRIMP.</p> <p>Staff have undertaken firefighting training (see WHS records)</p> <p>Council has purchased a designated firefighting water tanker.</p>
D	<p>A Waste Education Plan (GCC 2020d) has been prepared and outlines the waste education programs undertaken across the community. The includes school education programs, media campaigns, new resident packs, plastic free July 2021 campaign and a 2021 waste and recycling calendar.</p> <p>All waste is inspected upon entry at the Weighbridge.</p> <p>In the event of a fire Council has advised that the site is not left until the area is fully extinguished and the section is quarantined for a day or two as a precaution.</p> <p>When there is an extreme fire season (summer time and over 40 degrees at night) inspections of the site are carried out throughout the night.</p> <p>Council trialled IR cameras in 2019 which alerted if the active cell was superheating.</p>
E	<p>On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily. The current practices will be considered compliant from 2021.</p> <p>The full landfill area is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum</p>

Condition	Review
	area exposed to 1,000 to 2,000m ² . The system still appears to meet the goals of preventing fires in the waste, controlling vermin and achieving good compaction (GCC 2020c).
F	<p>Green waste is not used as a direct cover material, it is only used on the top of the final cover.</p> <p>The active cell is compacted each day which alleviates wind blow rubbish.</p> <p>On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily. The current practices will be considered compliant from 2021.</p> <p>The full landfill area is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m². The system still appears to meet the goals of preventing fires in the waste, controlling vermin and achieving good compaction (GCC 2020c).</p>
G	Cells are overlayed in a grid fashion. One lift the cell walls run east to west and the next lift the cell walls will run north and south.
H	Public access is restricted to designated areas.
I	The waste departments WHS records were provided by Council and show that the tasks for which SWMS have been prepared. The records list the name of those who have signed the SWMS and the date.
J	No information regarding appropriate supervision although the waste departments WHS records were provided by Council that show a log of staff inductions and other training
K	The waste departments WHS records were provided by Council that show a log of staff inductions and other training.
Not Triggered	
A	No evidence of fencing as not triggered yet.

4.19 Monitoring and recording conditions

The EPL conditions (M1.1 to M1.3) state the following:

The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition (M1.1).

- All records required to be kept by this licence must be:
 - in a legible form, or in a form that can readily be reduced to a legible form;
 - kept for at least 4 years after the monitoring or event to which they relate took place; and
 - produced in a legible form to any authorised officer of the EPA who asks to see them. (M1.2)

The following records must be kept in respect of any samples required to be collected for the purposes of this licence (M1.3):

- the date(s) on which the sample was taken;
- the time(s) at which the sample was collected;
- the point at which the sample was taken; and
- the name of the person who collected the sample.

4.19.1 Results

The EPA audit (2019) noted that the licensee could not provide a copy of the chain of custody for all samples taken for auditable records nor was the time of sampling recorded for all samples on the chain of custody or other records. This has resulted in some non-compliance.

4.19.1 Review

Whilst records of monitoring and conditions were available, they were not available for some areas and / or incomplete resulting in non-compliance.

Table 4.35: Monitoring and recording conditions compliance assessment

Condition	Review
EPL	
M.1.1	All monitoring results are set out as required by the condition (.
M1.2	Page 39 of the audit report demonstrates compliance here (EPA 2019).
M1.3	All required records for this condition have been recorded for all samples.

5. Statement of Compliance

A statement of compliance is included below in **Table 5.1** and summary of any non-compliance with the relevant TWMC approvals is outlined below in **Table 5.2** (see **Table 1.4** for compliance colour coding).

Table 5.1: Statement of compliance

Were all conditions of the relevant approval(s) complied with?	
Development Consent # 06_0334, EPL #5875	NO
Mining Lease #	NA

Table 5.2: Non-compliance

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
Project Approval #06_0334					
Waste					
Landfilling					
#06_0334	Condition 7, Schedule 3	Lists the site manager responsibilities in term of the exposed tip face, revegetation, capping, filling the landfill cells and the incident response register.	Non-compliant	Waste is not covered at the end of the day. On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily. Therefore, compliance will be achieved from 2021.	Section 4.3.3

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
				On the 18 of July 2019 Council was instructed by the EPA to provide a concept design for further comment. This is currently underway. Once the Closure/Rehabilitation Plan has been approved it will cover the works required for revegetation of the site.	
#06_0334	Condition 11, Schedule 3	Composting should be undertaken in accordance with AS 4454-2003	Non-compliant	Composting does not occur on the site. All green waste is mulched and stockpiled north of the asbestos landfill area for cover use.	Section 4.3.3
#06_0334	Condition 13, Schedule 3	The PA requires that the existing Landfill Environmental Management Plan be updated	Non-compliant	The Landfill Environmental Management Plan was most recently updated in March 1999.	Section 4.3.3
Leachate					
#06_0334	Condition 18, Schedule 3 (e)	e) Ensure that the leachate storage dams: <ul style="list-style-type: none"> i. Are capable of accepting leachate generated in a 1 in 100 year, 72 hour duration storm event without overflowing; 	Non-compliant	Leachate storage dams are designed to cater for a 1 in 100 year, 72 hour storm event. The EPA is concerned that the rill and gully erosion observed on the walls of the leachate dam and the growth of vegetation is likely to compromise the present permeability of the leachate dam's base and banks increasing the	Section 4.7.3

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
		ii. Have a re-compacted clay or modified soil layer that is at least 900 mm thick and in situ coefficient of permeability of less than 1×10^{-9} m/s, or, some other suitable liner approved by DECCW;		likelihood of the leachate pond being breached and unable to contain a design storm event (EPA 2019).	
Odour					
#06_0334	Condition 42, Schedule 3	No emission of any offensive odour must come from the premises where the licence applies. However, odour emissions are permitted provided they are in accordance with the conditions of the licence or that the only persons affected are workers on site. This is designed to minimise the nuisance effect to acceptable levels.	Non-compliant	No odour monitoring data has been provided. However, no complaints have been made regarding odour in the reporting period.	Section 4.12.3

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
Greenhouse Gas Emissions					
#06_0334	Condition 11, Schedule 3	Composting required on site.	Non-compliant	Council has advised that composting will not occur on site.	Section 4.13.3
#06_0334	Condition 12, Schedule 3	A feasibility report is required to be prepared for within 5 years of the Planning Approval	Non-compliant	No feasibility report has been provided.	Section 4.13.3
Rehabilitation and Landscape Management					
#06_0334	Condition 9, Schedule 3	Specific requirements for the visual amenity and litter control within 6 months of the date of project approval.	Non-compliant	Litter is removed by staff on site. No indication of daily inspections or weekly litter removal. There is no 1.8m high mesh fence around the active tipping area. Due to the fluid nature of the active tipping area Council uses litter fences as these are mobile and are able to be relocated when the active tipping area changes (GCC 2020c).	Section 1.1.1
EPL #5875					
Operations					
#5875	O5.5	The licensee must install and maintain a high wire mesh fence of not less than 1.8 metres around the	Non-compliant	There is no 1.8m high mesh fence around the active tipping area. Due to the fluid nature of the active tipping area Council uses litter fences as these are mobile and	Section 4.1.3

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
		active tipping area.		are able to be relocated when the active tipping area changes (GCC 2020c).	
Waste					
#5875	O5.8	A litter management program is to be implemented.	Non-compliant	Litter on site is collected by staff. There is no specific Litter Management Program.	Section 4.2.3
#5875	O6.6 and O6.13 – O6.15	Criteria for the screening, disposal, burning and covering of waste (O6.6, O6.8, O6.9, O6.13 – O6.15).	Non-compliant	<ul style="list-style-type: none"> The EPA annual return report states that burning of green waste has not occurred for some time and is used for mulch. Green waste is eventually shredded and stockpiled north of the asbestos landfill area. The EPA audit (2019) states: <ul style="list-style-type: none"> the stockpile is greater than 20 m diameter neither the green waste nor the biosolids are stored on an impermeable bunded area. full area of waste is not covered daily, but is compacted at the end of each day 	Section 4.2.3

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
				<ul style="list-style-type: none"> the licensee was not applying cover material over all exposed landfilled waste prior to ceasing operations at the end of each day. The Green waste pad construction was concluded on the 24/2/20 and has been in use ever since. The design of the Biosolids pad is currently being undertaken (GCC 2020c). 	
#5875	O6.16 – O6.17	Green waste and biosolids are stored on an impermeable bunded area	Non-compliant	<p>The majority of Biosolids are disposed of into landfill.</p> <p>Biosolids, if not disposed directly to landfill, is stockpiled in an area specifically isolated to allow the material to dry. These pits are eventually covered when the pit is both dry and full to capacity.</p> <p>The EPA audit (2019) states that neither the green waste nor the biosolids are stored on an impermeable bunded area. The green waste and biosolids waste</p>	Section 4.2.3

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
				<p>pads must be impermeable to that required and have a thickness of not less than 600mm.</p> <p>The design of the Biosolids pad is currently being undertaken (GCC 2020c).</p> <p>The Green waste pad construction was concluded on the 24/2/20 and has been in use ever since (GCC 2020c).</p> <p>The green waste pad has been completed and includes a bunded area capable of capturing all leachate in accordance with the EPL performance conditions.</p>	
Landfilling					
#5875	O6.14 and O6.15	Cover exposed landfill prior to ceasing operations each day.	Non-compliant	<p>The EPA audit (2019) states that the licensee was not applying cover material over all exposed landfilled waste prior to ceasing operations at the end of each day.</p> <p>On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily. Therefore, compliance will be achieved from 2021.</p>	Section 4.3.3

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
Leachate					
#5875	O6.2	The leachate collection system must be capable of capturing all leachate generated from the waste disposed of at the premises.	Non-compliant	<p>Storage dams are designed to cater for a 1 in 100 year, 72 hour storm event. Unclear if this meets the desired requirements.</p> <p>The current ponds, constructed in 2014, were designed to cater for the 1 in 100 year, 72 hour storm event.</p> <p>The leachate capture system has undergone a full redesign process.</p> <p>Council have just completed the final peer review of the new design plans and they are currently back with the designers. Council hopes this process will hopefully be finished soon.</p>	Section 4.7.3
EA					
Operations					
EA	A	Visual inspections of engineering works on a daily basis	Non-compliant	Council was not able to provide documentation of daily visual inspections of erosion and sediment controls for the independent audit.	Section 4.1.3
Waste					

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
-	F	Street sweeper waste to be stockpiled with green waste	Non-compliant	Due to the street sweeper waste being wet, it is disposed of down the side of the landfill or on a cell wall.	Section 4.2.3
Landfilling					
-	D	Install leachate collection system for landfill cells	Non-compliant	<p>A leachate collection system and holding ponds have been developed for the existing Landfill. The leachate ponds have been 'roughed out' and they will be formalised and engineered when the new Landfill development occurs. Leachate currently remains diverted solely to existing leachate ponds.</p> <p>There has been no leachate disposed of. What leachate is generated, is contained and natural evaporation takes place (GCC 2020c).</p> <p>The leachate capture system has undergone a full redesign process.</p> <p>Council have just completed the final peer review of the new design plans and they are currently back with the designers. Council hopes this process will hopefully be finished soon.</p>	Section 4.3.3
Biodiversity					

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
-	L	Develop and implement a weed and pest management strategy for the control and eradication of weed species and incorporate into the rehabilitation plan, and QOEMP and LOEMP	Non-compliant	The LOEMP is still under review. The required works (action plan) LOEMP has a section outlining the offset land, weed and pest animal monitoring requirements and refers to the relevant plans for details regarding how the work is to be undertaken. Weed and Pest Control Plans have been prepared and the works have commenced.	Section 4.4.3
-	M	Monitor success of revegetation and enhancement works onsite and in offset areas	Non-compliant	The LBMP states that throughout the majority of the BOA, no broadscale revegetation work is required due to its high resilience although some supplementary plantings may be required. The management works are currently in year 5 and therefore, assessment of the requirement for revegetation in MZ 1 cannot be made at this stage.	Section 4.4.3
-	Q	Assess the significance of various ephemeral swamps and water bodies as part of the Griffith Biodiversity Strategy	Non-compliant	The draft Griffith Biodiversity Management Strategy was last updated in December 2011. It has been advised from the Environment Health and Sustainability Coordinator that until an Environmental Officer (EO) is appointed	Section 4.4.3

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
				on staff at TWMC, this document will remain in its current form. Even with an EO, this project is not likely to be pencilled in as a priority for review.	
Surface Water					
-	D	Install sediment traps at discharge points	Non-compliant	Construction of a sedimentation basin has been completed although Council advised that there are no sediment traps installed.	Section 4.5.3
-	I	The stormwater detention pond will be lined with a flexible membrane and the water quality monitored on a quarterly basis	Non-compliant	<p>The stormwater pond is not lined with a flexible membrane and water quality monitoring is only undertaken twice a year.</p> <p>Construction has been completed for the Stormwater pond, resulting in a more formalised contaminant system.'</p> <p>Whilst there is no Flexible membrane for the stormwater pond, there has been major formalisation stormwater works up stream.</p> <p>Council will start looking at the Stormwater and Sedimentation Ponds in the 22/23 financial year budget.</p> <p>Monitoring more than twice a year is not proposed.</p>	Section 4.5.3

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
-	K		Non-compliant	Two stormwater control dams are on site. These are proposed to be expanded in the near future. All stormwater that falls on site is contained. Construction of a sedimentation basin has been completed although Council advised that there are no sediment traps installed.	
-	Q	Visual inspection of engineering works on a daily basis	Non-compliant	Council were unable to provide documentation of daily visual inspections of erosion and sediment controls for the independent audit.	Section 4.5.3
Groundwater					
-	A	Install two new groundwater monitoring bores west of the site	Non-compliant	No new boreholes have been installed in the past 10 years. However, a hydrogeological investigation carried out by Geolyse (2015) concluded that installation of additional piezometers and/or implementing a more rigorous groundwater monitoring program is not considered necessary.	Section 4.6.3
Greenhouse Gas Emissions					
-	B	Set greenhouse gas targets and incorporated into the	Non-compliant	No GHG monitoring has been undertaken or a target set.	Section 4.13.3

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
		landfill operational environmental management plan.			
Traffic and Transport					
-	B	Undertake regular road inspections.	Non-compliant	Council will start daily inspections in 2021.	Section 4.16.3
Incident Management and Response					
-	E	Cover daily to reduce risk of ignition from lightning strikes	Non-compliant	No information regarding the frequency of tip face replacement to prevent lightning strikes.	Section 4.18.3
-	F	Self-combustion minimisation	Non-compliant	<p>No information regarding the spreading of green waste in layer to minimise self-combustion.</p> <p>The EPA audit (2019) states that the licensee was not applying cover material over all exposed landfilled waste prior to ceasing operations at the end of each day.</p> <p>On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily. Therefore, compliance will be achieved from 2021.</p>	Section 4.18.3

6. Conclusion and recommendations

The Griffith City Council owned and operated Tharbogang Waste Management Centre operates under Project Approval 06_0334, which includes a specific requirement for an AEMR to be prepared annually. This is the third of these AEMRs and aims to assess the environmental performance of the site over the 2020 calendar year. Assessments are made with reference to the conditions within the PA, the EPL and the revised EA commitments. During the reporting period, a review of all existing quarry and landfill environmental management plans for the control and monitoring was undertaken. These documents provide the objectives and framework for the compliance and continual improvement objectives. They aim to ensure that the environment and neighbouring community are not adversely impacted by Tharbogang Waste Management Centre activities.

Community engagement

No complaints were received over the reporting period. The Customer Service Call Centre is used as a telephone complaints line and all complaints are recorded on Council's Complaint Management System.

However, it is unclear whether conditions requiring the development and implementation of a community education program and an indication of landholder consultation have been met over this reporting period. It is understood that the Utilities Committee was removed as a Council Committee back in 2017. Whilst community education programs were undertaken during the reporting period, the education program was approved by the DG, it was arranged through the RAMJO Waste Group (Riverina & Murray Organisation of Councils).

Compliance

A compliance assessment found that the TWMC had a moderate level of compliance with the PA and EPL conditions and EA revised statement of commitments. However, there has been an overall improvement in compliance since the 2018 AEMR. Twenty eight non-compliances were identified over the 2020 reporting period.

An EPA audit (2019) noted several non-compliances, some of which have been addressed since the audit. A small number of compliances were unable to be adequately assessed due to insufficient information and a total of 28 non-compliances were identified over the 2020 reporting period.

On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily. Therefore, compliance will be achieved from 2021 with regards to the original condition to cover landfilled waste daily.

Compliance for all relevant criteria were recorded for the following categories although some had conditions for which insufficient information was available to adequately assess compliance and / or conditions that were not yet triggered:

- Noise and Vibration
- Groundwater
- Meteorological Monitoring
- Blasting
- Air quality (Dust)

- Odour
- Heritage
- Dangerous goods and hazardous materials
- Monitoring and recording conditions

There is an absence of the following information and / or monitoring data (this list is not exhaustive and the compliance table in each section should be referred to):

- Odour monitoring data
- No information regarding landfill cells engineering design other than that they will be constructed to engineering details and surface water and leachate managed as per the PA conditions
- No information regarding batters with fissures and benches, contaminated soil disposal, soil testing, mulching and edge vegetation.
- No work with regards to Greenhouse Gas Emissions

Non-compliance was recorded for the following categories:

- Community relations
- Operations
- Waste
- Landfilling
- Biodiversity
- Surface water
- Odour
- Leachate
- Greenhouse gas emissions
- Rehabilitation and Landscape Management
- Traffic and transport
- Incident management and response

The monitored noise level LAeq (15 min) exceeded the assessment criterion of 35 LAeq (15 min) across all monitoring periods, at all sensitive receiver sites. However, it was concluded that it is unlikely that the landfill contributed to monitored noise levels at the sensitive receivers. Machinery movements associated with the Landfill were not audible at any of the sensitive receivers and the quarry was not operational during the monitoring. It was clear that noise from the quarry/landfill was not a key noise contributor at any of the sensitive receiver locations (NGH 2020b). **Table 6.1** outlines the actions required to be undertaken over the next reporting period and the proposed timeframes to achieve compliance. The EPA audit (2019) also noted a number of non-compliances, some of which have been addressed over the 2020 reporting period. Remaining non-compliances are outlined below in **Table 6.2**.

Table 6.1: Actions to be completed in the next reporting period

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
Project Approval #06_0334							
Landfilling							
#06_0334	Condition 7, Schedule 3	Lists the site manager responsibilities in term of the exposed tip face, revegetation, capping, filling the landfill cells and the incident response register.	Non-compliant	Waste is not covered at the end of the day. Management is looking for other compliant methods to cover waste at the end of the day.	Section 4.3.3	The Closure/Rehabilitation Plan has been approved and covers the works required for revegetation of the site.	This will be compliant from 2021. This will be compliant from 2021.
#06_0334	Condition 7, Schedule 3	Lists the tasks the site manager is required to do including cover the waste at the end of each day. Some tasks are not yet triggered.	Non-compliant	On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily. Therefore, compliance will be achieved from 2021.	Section 4.3.3		
#06_0334	Condition 11, Schedule 3	Composting should be undertaken in accordance with AS 4454-2003	Non-compliant	Given composting is not undertake at the site, it cannot be undertaken in accordance with the Australia standard.	Section 4.3.3	Nil	NA

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
				All green waste is mulched and stockpiled north of the asbestos landfill area for cover use.			
#06_0334	Condition 13, Schedule 3	The PA requires that the existing Landfill Environmental Management Plan be updated	Non-compliant	The Landfill Environmental Management Plan was most recently updated in March 1999.	Section 4.3.3	Nil	NA
Leachate							
#06_0334	Condition 18, Schedule 3 (e)	e) Ensure that the leachate storage dams: i. Are capable of accepting leachate generated in a 1 in 100 year, 72 hour duration storm event without overflowing;	Non-compliant	Leachate storage dams are designed to cater for a 1 in 100 year, 72 hour storm event. The EPA is concerned that the rill and gulley erosion observed on the walls of the leachate dam and the growth of vegetation is likely to compromise the present permeability of the leachate dam's base and banks increasing the likelihood of the leachate pond being breached and unable to	Section 4.7.3	Nil	NA

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
		ii. Have a re-compacted clay or modified soil layer that is at least 900 mm thick and in situ coefficient of permeability of less than 1×10^{-9} m/s, or, some other suitable liner approved by DECCW;		contain a design storm event (EPA 2019).			

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
Odour							
#06_0334	Condition 42, Schedule 3	No emission of any offensive odour must come from the premises where the licence applies. However, odour emissions are permitted provided they are in accordance with the conditions of the licence or that the only persons affected are workers on site. This is designed to minimise the nuisance effect to acceptable levels.	Non-compliant	No odour monitoring data has been provided. However, no complaints have been made regarding odour in the reporting period.	Section 4.12.3		

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
Greenhouse Gas Emissions							
#06_0334	Condition 11, Schedule 3	Composting required on site.	Non-compliant	Council has advised that composting will not occur on site.	Section 4.13.3	Composting will not occur in site.	NA
#06_0334	Condition 12, Schedule 3	A feasibility report is required to be prepared for within 5 years of the Planning Approval	Non-compliant	No feasibility report has been provided.	Section 4.13.3		
Rehabilitation and Landscape Management							
#06_0334	Condition 9, Schedule 3	Specific requirements for the visual amenity and litter control within 6 months of the date of project approval.	Non-compliant	Litter is removed by staff on site. No indication of daily inspections or weekly litter removal. There is no 1.8m high mesh fence around the active tipping area. Due to the fluid nature of the active tipping area Council uses litter fences as these are mobile	Section 1.1.1		

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
				and are able to be relocated when the active tipping area changes (GCC 2020c).			
EPL #5875							
Operations							
#5875	O5.5	The licensee must install and maintain a high wire mesh fence of not less than 1.8 metres around the active tipping area.	Non-compliant	There is no 1.8m high mesh fence around the active tipping area. Due to the fluid nature of the active tipping area Council uses litter fences as these are mobile and are able to be relocated when the active tipping area changes (GCC 2020c).	Section 4.1.3		
Waste							
#5875	O5.8	A litter management program is to be implemented.	Non-compliant	Litter on site is collected by staff. There is no specific Litter Management Program.	Section 4.2.3		
#5875	O6.6 and O6.13 – O6.15	Criteria for the screening, disposal, burning and covering of waste (O6.6, O6.8, O6.9, O6.13 – O6.15).	Non-compliant	The EPA annual return report states that burning of green waste has not occurred for some time and is used for mulch. Green waste is eventually shredded and stockpiled	Section 4.2.3		

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
				<p>north of the asbestos landfill area.</p> <p>The EPA audit (2019) states:</p> <ul style="list-style-type: none"> the stockpile is greater than 20 m diameter neither the green waste nor the biosolids are stored on an impermeable bunded area. full area of waste is not covered daily, but is compacted at the end of each day and has been approved by the EPA. <p>The Green waste pad construction was concluded on the 24/2/20 and has been in use ever since.</p> <p>The design of the Biosolids pad is currently being undertaken (GCC 2020c).</p>			

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
#5875	O6.16 – O6.17	Green waste and biosolids are stored on an impermeable bunded area	Non-compliant	<p>The majority of Biosolids are disposed of into landfill.</p> <p>Biosolids, if not disposed directly to landfill, is stockpiled in an area specifically isolated to allow the material to dry. These pits are eventually covered when the pit is both dry and full to capacity.</p> <p>The EPA audit (2019) states that neither the green waste nor the biosolids are stored on an impermeable bunded area. The green waste and biosolids waste pads must be impermeable to that required and have a thickness of not less than 600mm.</p> <p>The design of the Biosolids pad is currently being undertaken (GCC 2020c).</p> <p>The Green waste pad construction was concluded on the 24/2/20 and has been in use ever since (GCC 2020c).</p>	Section 4.2.3		

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
				The green waste pad has been completed and includes a bunded area capable of capturing all leachate in accordance with the EPL performance conditions.			
Landfilling							
#5875	O6.14 and O6.15	Cover exposed landfill prior to ceasing operations each day.	Non-compliant	<p>The EPA audit (2019) states that the licensee was not applying cover material over all exposed landfilled waste prior to ceasing operations at the end of each day.</p> <p>TWMF state in the Annual Return (2020) that due to a lack of cover material, operationally it is difficult to meet this license requirement and that they are looking into a mechanical solution (landfill lids/tarps). The active cell is compacted each day which alleviates wind blow rubbish.</p> <p>On 9 December 2020 Council obtained approval from the EPA to compact waste in</p>	Section 4.3.3	This will be compliant from 2021.	This will be compliant from 2021.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
				accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily. Therefore, compliance will be achieved from 2021.			
Leachate							
#5875	O6.2	The leachate collection system must be capable of capturing all leachate generated from the waste disposed of at the premises.	Non-compliant	Storage dams are designed to cater for a 1 in 100 year, 72 hour storm event. The leachate capture system has undergone a full redesign process. Council have just completed the final peer review of the new design plans and they are currently back with the designers. Council hopes this process will hopefully be finished soon.	Section 4.7.3		
EA							
Operations							
EA	A	Visual inspections of engineering works on a daily basis	Non-compliant	Council was not able to provide documentation of daily visual inspections of	Section 4.1.3		

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
				erosion and sediment controls for the independent audit.			
Waste							
-	F	Street sweeper waste to be stockpiled with green waste	Non-compliant	Due to the street sweeper waste being wet, it is disposed of down the side of the landfill or on a cell wall.	Section 4.2.3		
Landfilling							
-	D	Install leachate collection system for landfill cells	Non-compliant	<p>A leachate collection system and holding ponds have been developed for the existing Landfill. The leachate ponds have been 'roughed out' and they will be formalised and engineered when the new Landfill development occurs. Leachate currently remains diverted solely to existing leachate ponds.</p> <p>There has been no leachate disposed of. What leachate is generated, is contained and natural evaporation takes place (GCC 2020c).</p>	Section 4.3.3		

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
				<p>The leachate capture system has undergone a full redesign process.</p> <p>Council have just completed the final peer review of the new design plans and they are currently back with the designers. Council hopes this process will hopefully be finished soon.</p>			
Biodiversity							
-	L	Develop and implement a weed and pest management strategy for the control and eradication of weed species and incorporate into the rehabilitation plan, and QOEMP and LOEMP	Non-compliant	<p>The LOEMP is still under review. The required works (action plan) LOEMP has a section outlining the offset land, weed and pest animal monitoring requirements and refers to the relevant plans for details regarding how the work is to be undertaken.</p> <p>Weed and Pest Control Plans have been prepared and the works have commenced.</p>	Section 4.4.3		
-	M	Monitor success of revegetation and enhancement works	Non-compliant	The LBMP states that throughout the majority of the BOA, no broadscale	Section 4.4.3		

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
		onsite and in offset areas		revegetation work is required due to its high resilience although some supplementary plantings may be required. The management works are currently in year 5 and therefore, assessment of the requirement for revegetation in MZ 1 cannot be made at this stage.			
-	Q	Assess the significance of various ephemeral swamps and water bodies as part of the Griffith Biodiversity Strategy	Non-compliant	The draft Griffith Biodiversity Management Strategy was last updated in December 2011. It has been advised from the Environment Health and Sustainability Coordinator that until an Environmental Officer (EO) is appointed on staff at TWMC, this document will remain in its current form. Even with an EO, this project is not likely to be pencilled in as a priority for review.	Section 4.4.3		

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
Surface Water							
-	D	Install sediment traps at discharge points	Non-compliant	Construction of a sedimentation basin has been completed although Council advised that there are no sediment traps installed.	Section 4.5.3		
-	I	The stormwater detention pond will be lined with a flexible membrane and the water quality monitored on a quarterly basis	Non-compliant	<p>The stormwater pond is not lined with a flexible membrane and water quality monitoring is only undertaken twice a year.</p> <p>Construction has been completed for the Stormwater pond, resulting in a more formalised contaminant system.'</p> <p>Whilst there is no Flexible membrane for the stormwater pond, there has been major formalisation stormwater works up stream.</p> <p>Monitoring more than twice a year is not proposed.</p>	Section 4.5.3	Council will start looking at the Stormwater and Sedimentation Ponds in the 22/23 financial year budget.	22/23 financial year
-	K			Two stormwater control dams are on site. These are proposed to be expanded in			

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
				the near future. All stormwater that falls on site is contained. Construction of a sedimentation basin has been completed although Council advised that there are no sediment traps installed.			
-	Q	Visual inspection of engineering works on a daily basis	Non-compliant	Council were unable to provide documentation of daily visual inspections of erosion and sediment controls for the independent audit.	Section 4.5.3		
Groundwater							
-	A	Install two new groundwater monitoring bores west of the site	Non-compliant	No new boreholes have been installed in the past 10 years. However, a hydrogeological investigation carried out by Geolyse (2015) concluded that installation of additional piezometers and/or implementing a more rigorous groundwater monitoring program is not considered necessary.	Section 4.6.3		

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
Greenhouse Gas Emissions							
-	B	Set greenhouse gas targets and incorporated into the landfill operational environmental management plan.	Non-compliant	No GHG monitoring has been undertaken or a target set.	Section 4.13.3		
Traffic and Transport							
-	B	Undertake regular road inspections.	Non-compliant	No indication of traffic and road inspections has been provided.	Section 4.16.3	Council will start daily inspections in 2021.	Start of 2021.
Incident Management and Response							
-	E	Cover daily to reduce risk of ignition from lightning strikes	Non-compliant	The full landfill area is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m ² . The system still appears to meet the goals of preventing fires in (GCC 2020c). On 9 December 2020 Council obtained approval from the EPA to compact waste in	Section 4.18.3	This will be compliant in 2021.	Start of 2021.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment	Relevant section	Proposed action	Timing of proposed actions
				accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily. Therefore, compliance will be achieved from 2021.			
-	F	Self-combustion minimisation	Non-compliant	<p>The full landfill area is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m². The system still appears to meet the goals of preventing fires in (GCC 2020c).</p> <p>On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily. Therefore, compliance will be achieved from 2021.</p> <p>Therefore, compliance will be achieved from 2021.</p>	Section 4.18.3		

Table 6.2: EPA audit (2019) – remaining non-compliance

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
Requested by – EPA Audit (2019)								
EPL #5875	O4.1	Have in place and implement fire prevention measures to minimise risk of fire at the premises	Non-compliant	Combustible material at the landfill is covered at the end of the working day with VENM or other appropriate non-combustible material,	Section 4.1.3	The full area of waste is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m ² . Council states that the system still appears to meet the goals of preventing fires in the waste, controlling vermin and achieving good compaction. On 9 December 2020 Council obtained approval from the EPA to compact waste in	3 months from date of final report.	Will be compliant from 2021.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
						accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily.		
EPL #5875	O5.5	The licensee must install and maintain a high wire mesh fence of not less than 1.8 metres around the active tipping area	Non-compliant	The licensee must comply with the condition and construct the required 1.8m high meshed fence around the active landfill area.	Section 4.1.3	There is no 1.8m high mesh fence around the active tipping area. Due to the fluid nature of the active tipping area Council uses litter fences as these are mobile and are able to be relocated when the active tipping area changes (GCC 2020c). There is fencing to the west of the current landfill that was greater than 1.5m mesh fencing but this was a boundary fence.	6 months from the date of final report.	TBA

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
EPL #5875	O5.9	Requires that pests, vermin and weeds be controlled.	Non-compliant	The licensee must comply with the condition in full. The licensee must review the current noxious weed eradication program for the site (and adjacent Council owned sites). The eradication program should aim to be complete within 6 months.	Section 4.4.3	Council had a Weed Control plan developed in 2019. This will be reviewed (desktop and in the field). Council has a contractor who treats noxious weeds on site and a contractor who comes on site twice a year and undertakes pest animal control.	6 months from the date of final report then ongoing.	TBA
			Non-compliant	A further program of monitoring and maintenance must also be agreed with the EPA to ensure noxious weeds are kept under control at the site.	Section 4.4.3	Council has a contractor who treats noxious weeds on site and a contractor who comes on site twice a year and undertakes pest animal control.	6 months from the date of final report then ongoing	Ongoing
			Non-compliant	The application of daily cover	Section 4.4.3	Council has a contractor who	6 months from the date of	Ongoing

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
				coupled (effective within 1 month) with a vermin control program agreed with the EPA is to be implemented within 3 months. The controls used must have minimal impact on native fauna species.		treats noxious weeds on site and a contractor who comes on site twice a year and undertakes pest animal control.	final report then ongoing	
EPL #5875	O6.14	The completed landfill cells are to follow the prescribed requirements and the criteria for the covering of waste.	Non-compliant	The licensee must apply approved cover to the appropriate depth to the landfill at the end of the day and similar cover to the animal pits when animal carcasses are disposed of. The licensee must also ensure that asbestos disposed of on site is immediately and	Section 4.1.3	The full landfill area is not covered daily, but is compacted at the end of each day. Council progressively covers waste maintaining minimum area exposed to 1,000 to 2,000m ² . The system still appears to meet the goals of preventing fires in the waste, controlling vermin	Immediately	This will be compliant from 2021.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
				properly covered with VENM.		and achieving good compaction (GCC 2020c). On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily.		
EPL #5875	O6.15	The completed landfill cells are to follow the prescribed requirements and the criteria for the covering of waste.	Non-compliant	The licensee must ensure that cover material over the landfill is maintained. The licensee upon receipt of a significant quantity of putrescible material from a meat/chicken processing facility	Section 4.1.3	On 9 December 2020 Council obtained approval from the EPA to compact waste in accordance with O6.7 given the difficulty in sourcing clean fill to cover the landfilled waste daily.	Immediately	This will be compliant from 2021.

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
				or other such facility must cover the material as soon as practicable on the day of receipt. The material should then receive further cover when the daily cover is applied.				

EPL #5875	O6.16 / O6.17	Green waste and biosolids are stored on an impermeable bunded area	Non-compliant	<p>An impermeable pad with bunding is required to be constructed on the site where biosolids are to be “temporarily stored”.</p> <p>Once dried the biosolids must be disposed of to landfill. The two older windrows of biosolids and soil must therefore be transferred to the landfill for burial as soon as is practicable.</p> <p>The licensee must ensure that the biosolids pad has a performance equivalent of a clay liner with a permeability of 1 x 10⁻⁹m/s or less and a thickness of no less than 600mm.</p>	Section 4.2.3	<p>The majority of Biosolids are disposed of into landfill.</p> <p>Biosolids, if not disposed directly to landfill, is stockpiled in an area specifically isolated to allow the material to dry. These pits are eventually covered when the pit is both dry and full to capacity.</p> <p>The design of the Biosolids pad is currently being undertaken (GCC 2020c).</p>	Construction 6 months from date of final report Biosolids transfer to landfill 2 months from date of final report	The design of the Biosolids pad is currently being undertaken (GCC 2020c).
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Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
EPL #5875	R2.1		NA	The EPA must be notified of the activation of the PIRMP immediately (as soon as practical) due to a pollution incident, irrespective of the material harm factor.	Section 4.18.3	The Annual return report states that there were no incidents of environmental harm during the reporting period (GCC 2020c).	Ongoing	Ongoing
EPL #5875	R2.2		NA	Ensure all written incident reports are received by the EPA within the required 7day limit.	Section 4.18.3	The Annual return report states that there were no incidents of environmental harm during the reporting period (GCC 2020c).	Ongoing	Ongoing
EPL #5875	R4.1f)	Criteria for recording fires	NA	Add observations regarding smoke direction and dispersion to report.	Section 4.18.3	There was no fire in this reporting period (GCC 2020c).	Ongoing	Ongoing

Relevant Approval	Condition #	Condition description (summary)	Compliance status	Comment / Action required from previous Annual Review	Where addressed in Annual Review	Proposed Action	EPA proposed timing	Timing of proposed action
EPL #5875	R4.1g)	Criteria for recording fires	NA	Provide estimate of amount of waste combusted.	Section 4.18.3	There was no fire in this reporting period (GCC 2020c).	Ongoing	Ongoing
EPL #5875	R4.2	Criteria for recording fires	NA	Once emergency services are notified and Licensee's response initiated the EPA must be notified of any fire on the premise.	Section 4.18.3	There was no fire in this reporting period (GCC 2020c).	Ongoing	Ongoing

Recommendations

It is recommended that the compliance tables in Section 4 of this AEMR are used as a 'checklist' for future compliance and ensuring conditions are met as additional criteria are triggered (blue). Further Table 6.1 and Table 6.2 should be used to identify non-compliances that require addressing as a priority and in accordance with the timeframes outlined in the EPA audit report. Twenty-eight non-compliances were identified over the 2020 reporting period.

Areas of non-compliance (red) should be addressed promptly in general and areas where insufficient information was available (white) should be reviewed by Council. Where data is available, this should be reviewed to identify areas of non-compliance or provide the relevant information to enable the assessment of compliance to be revised.

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Appendix A – Mitigation and management commitments in the PA

Table E1: Mitigation and management commitments

MITIGATION AND MANAGEMENT MEASURE	RESPONSIBILITY	IMPLEMENTATION SCHEDULE	PERFORMANCE INDICATOR, STANDARD OR GUIDELINE	DOCUMENT REFERENCE
FLORA AND FAUNA				
<ul style="list-style-type: none"> Develop and implement Griffith Biodiversity Management Strategy 	Council	Project commencement	Strategy review of biodiversity outcomes	EA Section 7.2.2 'Onsite measures'
<ul style="list-style-type: none"> All retained areas of native vegetation on Lot 201 and Lot 202 (that is areas not subject to the proposed and envisaged future clearing for quarrying operations) will be protected in perpetuity as part of the offset package and rezoned to Environmental Conservation or Environmental Management Revegetate and enhance (where possible) to create a contiguous corridor with Lot 201 on the western boundary Maintain and enhance a 40m riparian zone on either side of the ephemeral drainage line 	Contractors	Prior to commencement of each quarry pit	Species survival counts Structural and floristic diversity Buffer dimensions	EA Section 7.2.2 'Onsite measures'
<ul style="list-style-type: none"> Collect, store and/or propagate seeds for rehabilitation purposes (to be stipulated in the detailed rehabilitation plan) 	Council	Prior to commencement of each quarry pit	Species diversity in seed collection	EA Sections 6.3.6 and 6.4.4 'Rehabilitation and final landform'
<ul style="list-style-type: none"> Relocate hollow trees and woody debris to corridors and areas not designated for clearing 	Council	Prior to commencement of each quarry pit		EA Section 7.2.2 'Onsite Measures'
<ul style="list-style-type: none"> Clearing of hollow-bearing trees will be undertaken outside of the main bird breeding periods and trees will be inspected for resident fauna by a suitably qualified ecologist. Appropriate action will be taken prior to removal should the presence of native fauna be confirmed 	Qualified NSW Parks Officer or equivalent	Prior to commencement of each quarry pit	Property Vegetation Plan (Native Vegetation Act 2003)	EA Section 7.2.2 'Onsite measures'
<ul style="list-style-type: none"> Undertake detailed flora and fauna assessments of proposed offsets 	Council	Prior to the commencement of each quarry pit	Consultant Brief 2007 'Objectives and Assessment Tasks', and in consultation with DECC	EA Section 10.2
<ul style="list-style-type: none"> Refine the offset package described in Appendix C to the satisfaction of the Department of Planning and implement it prior to the commencement of the new quarrying activities in order to compensate 	Council	Prior to the commencement of each quarry pit	Approval from the Department of Planning and verified number of hectares protected and reported as offsets	EA Section 7.2.2 'Offsets' EA Section 10.4

for the native vegetation to be cleared				
<ul style="list-style-type: none"> Enhance onsite vegetation in areas not designated for clearing through direct seeding, thinning, grazing exclusion, weed and fire management Develop and implement a weed and pest management strategy for the control and eradication of weed species and incorporate into the rehabilitation plan, and QOEMP and LOEMP Monitor success of revegetation and enhancement works onsite and in offset areas 	Council	Ongoing		EA Section 7.2.2 EA Section 10.5
<ul style="list-style-type: none"> Prepare a detailed rehabilitation plan for the quarry and landfill components to achieve the rehabilitation outcomes identified in the EA. The rehabilitation plan will describe short, medium and long-term measures what will be implemented to rehabilitate the site, manage the remnant vegetation and habitat on the site and landscaping of the site to mitigate any visual impacts of the project. Performance monitoring and completion criteria will be designed to demonstrate that the rehabilitation outcomes identified in the EA and rehabilitation plan are met. 	Council	Project commencement and ongoing	DECCW approval	EA Section 6.3.6 and 6.4.4
<ul style="list-style-type: none"> Progressively clear vegetation for each quarry pit Progressively rehabilitate each quarry pit 	Council/Contractors	Ongoing	Number of hectares successfully rehabilitated Species survival counts	EA Section 6.3.6
<ul style="list-style-type: none"> Cap and rehabilitate the landfill on completion 	Council/Contractors	Landfill closure	Species survival counts	EA Section 6.4.4
GROUNDWATER				
<ul style="list-style-type: none"> Install 2 new licensed groundwater monitoring bores west of the site 	Landfill Operations Manager	Project commencement	<i>Minimum Construction Requirements for Water Bores in Australia 2003</i>	EA Section 7.3.2 & figure 7.3
<ul style="list-style-type: none"> Licence new groundwater monitoring bores 	Landfill Operations Manager	Prior to installation of new bores	<i>Water Act 1912 (NSW)</i>	EA Section 7.3.2
<ul style="list-style-type: none"> Establish and implement groundwater monitoring program in accordance with DECCW requirements 	Quarry and Landfill Operations Managers	Project commencement	<i>EPA Environmental Guidelines: Solid Waste Landfill 1996</i> <i>Guidelines for Water Quality Monitoring and Reporting ANZECC 2000</i> <i>Approved Methods for the Sampling and Analysis of Water Pollutants in NSW 2004</i>	EA Section 7.3.2
<ul style="list-style-type: none"> Construct appropriately engineered landfill cells lined with an impermeable liner (i.e. with a permeability less than 10^{-9}ms^{-1}) and a 	Council, project designers and	Construction	<i>EPA Guidelines for Aqueous Liquid Treatment Ponds</i>	EA Section 6.4.3 Monitoring and

drainage layer <ul style="list-style-type: none"> Construct a leachate collection system with appropriate holding pond and/or tanks to divert leachate back to landfill Construct surface water diversions around landfill Install high level alarm to the leachate pond interlocked with the drainage system to prevent overfilling Install monitoring and alarm system to detect possible failures in the leachate collection system and liner 	contractor		EPA Leachate Barrier System Guidelines EPA Leachate Collection System Guidelines EPA Environmental Guidelines: Solid Waste Landfills 1996	maintenance' & Section 7.3.2
<ul style="list-style-type: none"> Establish assessment procedures to determine extent of leachate system failure Establish and maintain a landfill incident response register and assessment of potential risks 	Landfill Operations Manager	Ongoing		EA Section 7.3.2
<ul style="list-style-type: none"> Visual inspections of engineering works on a daily basis 	Site Manager	Ongoing		EA Section 9.5
<ul style="list-style-type: none"> Install operational backflow device on potable water supply pipeline Identify, map and colour code all pipelines on site 	Landfill Operations Management	Project Commencement	National and State plumbing regulations	EA Section 6.5
<ul style="list-style-type: none"> Contour, cap and revegetate to top profile of the landfill form to maximum 5% gradient 	Landfill Operations Manager	Closure	EPA Environmental Guidelines: Solid Waste Landfills 1996	EA Section 6.4.4
<ul style="list-style-type: none"> Conduct ongoing groundwater monitoring post closure and action non-compliances 	Council	Closure	EPA Environmental Guidelines: Solid Waste Landfills 1996	EA Section 7.3.2
GROUNDWATER DEPENDANT ECOSYSTEMS				
<ul style="list-style-type: none"> Progressively rehabilitate quarry voids to limit area of disturbance potential for loss / gain of water accession to groundwater 	Quarry contractor	Completion of extraction in each pit		EA Section 6.3.6
<ul style="list-style-type: none"> Install leachate collection system for landfill cells. 	Council, project designers and contractor	Construction		EA Section 7.3.2
<ul style="list-style-type: none"> Construct / install stormwater and sedimentation controls 	Council, project designers and contractor	Construction		EA Sections 7.5.2
<ul style="list-style-type: none"> Assess the significance of the various ephemeral swamps and water bodies as part of the Griffith Biodiversity Strategy 	Council	Ongoing		EA Section 5.11

SURFACE WATER

<ul style="list-style-type: none"> Council will prepare a surface water management plan to the satisfaction of the NSW Office of Water. This should include measures to ensure that contaminated runoff will not leave the site. 	Council	Prior to project commencement	<i>Approval of plan by NSW Office of Water</i>	EA Sections 7.4.2 and 7.5.2
<ul style="list-style-type: none"> Construct diversion drains and bunds around perimeter of quarry pits Install pumps to divert surface water to settlement and stormwater detention ponds Install sediment trap at discharge point Incorporate energy dissipation and erosion protection measures in surface water diversions 	Council, project designers and contractor	Construction	<i>Managing Urban Stormwater: Soils and Construction (Landcom, 2004)</i>	EA Section 7.5.2
<ul style="list-style-type: none"> Install table drains, culvert pipes and silt traps on all access new roads, i.e. to pit 101 Undertake all engineering works to minimise erosion and soil contamination 	Council, project designers and contractor	Construction	<i>RTA Roadside Handbook - environmental guidelines for road construction and maintenance workers 1995</i> <i>RTA Road Design Guidelines (draft Chapter 7 – drainage)</i>	EA Section 6.2.2
<ul style="list-style-type: none"> Ensure all water storages are engineered for peak weather events (1 in 100 year 72 hour rainfall event) The stormwater detention pond will be lined with a flexible membrane and the water quality monitored on a quarterly basis 	Council, project designers and contractor	Construction and ongoing	<i>ANCOLD Guidelines on Design Floods for Dams 1994</i> <i>ANCOLD Guidelines Environmental Management for Dams 2001</i>	EA Section 6.5 Appendix J, Section 7.2
<ul style="list-style-type: none"> Install bunding and spill kits in the vicinity of any chemicals or fuels stored or used onsite 	Quarry and Landfill Operations Managers	Ongoing	<i>AS 1940 The storage and handling of flammable and combustible liquids 2004</i> <i>Dangerous Goods Regulations 2005</i>	EA Section 6.3.4
<ul style="list-style-type: none"> Install operational backflow device on potable water supply pipeline Identify, map and colour code all pipelines on site 	Landfill Operations Manager	Project Commencement	<i>National and State plumbing regulations</i>	EA Section 6.5
<ul style="list-style-type: none"> Visual inspection of engineering works 	Site Manager	Ongoing		EA Section 9.5

SOILS

<ul style="list-style-type: none"> Containment spill kit will be kept on site at all times Contaminated soils will be removed and placed in the active putrescible landfill cell Soils testing will be conducted down gradient of the landfill, leachate collection system, leachate pond, quarry pits and settlement pond to ensure soil quality remains intact 	Site Manager	Commencement of works and ongoing	Number of spills and remediation action	EA Sections 6.3.4 and 7.6.2
<ul style="list-style-type: none"> Construct cut-off drains and diversions with erosion control measures 	Council, project designers and	Construction	<i>Managing Urban Stormwater: Soils and</i>	EA Section 7.6.2

	contractor		Construction (Landcom, 2004)	
▪ Periodically check and empty sediment trap at settlement dam	Contractor	Ongoing		EA Section 7.6.2
▪ Wet down stockpiles as per the Dust Management Plan	Contractor	Ongoing		EA Section 7.6.2
▪ Enhance vegetation in edge areas (landfill, roads, quarry edges etc)	Council	Ongoing	Species survival counts	EA Section 7.2.2
▪ Cover edges with mulch as a temporary measure			Evidence of erosion	'Onsite measures'
▪ Progressively revegetate quarry stages	Contractor	On completion of each quarry stage	Number of hectares successfully rehabilitated Species survival counts	EA Section 6.3.6
SALINITY				
▪ Install closed leachate collection system and surface water controls around landfill	Council, project designers and contractor	Construction	Managing Urban Stormwater: Soils and Construction (Landcom, 2004)	EA Section 7.7.2
▪ Install sedimentation dam and drainage channels to direct water from quarries				
AIR QUALITY				
▪ Implement procedures for investigating complaints	Council	Ongoing	Number of complaints registered and finalised	EA Section 7.17
▪ Water cart for dust suppression on unsealed roads	Contractor	Ongoing	Compliance with Dust Management Plan	EA Section 7.8.2
▪ Water down uncovered stockpiles				
▪ Conduct odour modelling in the event of a complaint / incident	Council	Ongoing	Approved Methods for the Sampling and analysis of Air Pollutants NSW 2007	EA Section 7.8.2
▪ Water sprayers will be used on the crusher whenever it is operating	Council	Ongoing	Compliance with Dust Management Plan	
▪ When the 10 minute average wind speed measured at the quarry exceeds 30km/hr from the north-east quadrant (between 0 degrees and 90 degrees) operation of the quarry will cease or as specified in Dust Management Plan	Council	Ongoing	Compliance with Dust Management Plan	
▪ When the average wind speed measured at the quarry in any direction exceeds 35km/hr (10 minute average), then all construction and operation of the quarry will cease or as specified in Dust Management Plan.	Council	Ongoing	Compliance with Dust Management Plan	
▪ A Dust Management Plan incorporating dust monitoring to be developed and submitted to DECCW.	Council	Prior to Project Commencement	Approval from DECCW	

GREENHOUSE GAS EMISSIONS

<ul style="list-style-type: none"> Capture and flare landfill gases and monitor emissions Once data is available, a greenhouse gas target will be set and incorporated into the landfill operational environmental management plan 	Landfill Operations Manager	Ongoing	POEO (Clean Air) Regulations 2002 - schedule 2 EPA Environmental Guidelines: Solid Waste Landfills 1996	EA Section 7.9.2
<ul style="list-style-type: none"> Construct and operate waste transfer station to reduce waste to landfill 	Council	Within 2 years of project commencement	Handbook for the Design and Operation of Rural and Regional Transfer Stations 2006	EA Figure 6.11
<ul style="list-style-type: none"> Cover active tip face daily with green waste to improve bioreaction process 	Council	Ongoing	Environmental Guidelines: Solid Waste Landfills	EA Section 7.9.2

NOISE AND VIBRATION

<ul style="list-style-type: none"> Implement procedures for investigating complaints 	Council	Ongoing	Number of complaints registered and finalised	EA Section 7.17
<ul style="list-style-type: none"> Where quarry plant noise is found to exceed the intrusive goal of 35dB (L_{Aeq, 15 min}) at affected residences, the plant will be moved or modified to ensure the noise impact from plant is below 35dB (L_{Aeq, 15 min}). 	Contractor	Ongoing	Number of exceedences	EA Section 7.7.2
<ul style="list-style-type: none"> Blasting airblast overpressure (in dB Linear Peak) and ground vibration peak particle velocity (in millimetres per second) will be measured for the first three blasts at the nearest affected residence. If these are well within the limits and there are no complaints, then monitoring will be undertaken once a year. The results will be reported to DECCW. Blasting will only occur between 9.00am -3pm, Monday to Friday excluding public holidays. 	Contractor	Ongoing	Number of exceedences	
<ul style="list-style-type: none"> Restrict operating hours of the quarry to 8.30am - 5pm 	Contractor	Ongoing		EA Section 6.4.3
<ul style="list-style-type: none"> Notify residents within 2,000m of intention to blast at least 7 days in advance 	Council / Contractor	Ongoing		EA Section 7.8.2

HAZARDS

<ul style="list-style-type: none"> Erect fencing above quarry walls 	Contractor	Prior to commencement of quarry works	DPI Safety Bulletin: working near quarry benches 2008	EA Section 7.10.2
<ul style="list-style-type: none"> Implement procedures for refusing prohibited wastes Construct defined asbestos disposal zone 	Landfill Operational Manager	Construction	Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes 2004	EA Table 7.13
<ul style="list-style-type: none"> Construct bunded area for diesel containers 	Quarry Operational	Construction	AS 1940 The storage and handling of	EA Section 6.3.4

	Manager		<i>flammable and combustible liquids 2004 Dangerous Goods Regulations 2005</i>	
<ul style="list-style-type: none"> Develop and implement fire management procedures in consultation with the Griffith Fire Control Centre, and submit to emergency services Develop emergency response and contingency procedures as part of the operational plans 	Landfill Operational Manager	Construction		EA Table 7.13
<ul style="list-style-type: none"> Store chemicals and explosives offsite 	Landfill Operational Manager	Ongoing	<i>Explosives Act 2003 and Regulations 2005</i>	EA Table 7.13
<ul style="list-style-type: none"> Public education and additional inspection for prohibited wastes and burning materials 	Landfill Operational Manager		<i>Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes 2004</i>	EA Table 7.13
<ul style="list-style-type: none"> Reduce tip face and cover daily to reduce risk of ignition from lightening strikes Spread green waste in thin layers to minimise risk of self-combustion Street sweeper waste to be stockpiled with green waste Manage and monitor waste prior to disposal in the landfill cell and implement other measures outlined in Table 7.13 of the EA Create vertical and horizontal layers in inert cell with clay to isolate volume of waste prone to a fire event 	Landfill operational manager	Ongoing		EA Table 7.13
<ul style="list-style-type: none"> Limit access to quarry face and exposed edges Conduct safe work methods statements for potentially hazardous tasks Ensure appropriate supervision for personnel for all tasks Conduct site inductions and periodic refresher training for all employees, contractors and transport contractors 	All personnel	Ongoing	<i>DPI Safety Bulletin: working near quarry benches 2008</i>	EA Section 7.10.2 & Table 7.13

WASTE MINIMISATION

<ul style="list-style-type: none"> Construct waste transfer station 	Project design and contractor	Construction	<i>Handbook for the Design and Operation of Rural and Regional Transfer Stations 2006</i>	EA Figure 6.4.3 'Infrastructure and equipment'
<ul style="list-style-type: none"> Re-direct recyclables for processing 	Landfill Operations Manager	Within 2 years of project commencement	<i>NSW Waste avoidance and Resource Recovery Strategy 2007</i>	EA Section 8.3
<ul style="list-style-type: none"> Record the waste stream and amount received, recovered and recycled, and disposed of in landfill 	Landfill Operations Manager	Ongoing	<i>NSW Waste avoidance and Resource Recovery Strategy 2007</i>	EA Section 8.3

			DECC Online Tracking Service Pack DECC Online Waste Reporting Service Pack and User Guide	
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TRAFFIC

▪ Implement procedures for investigating complaints	Council	Prior to commencement of works	Number of complaints registered and finalised	EA Section 7.17
▪ Undertake regular traffic and road inspections and any works required will be undertaken in accordance with road and rail design standard applicable at the time	Council	Every 5 years	In consultation with RTA and the rail authorities, and standards current to the time	EA Section 7.11.2
▪ Compile Transport Management Plan	Council	Prior to commencement of works	Approval of plan by RTA.	
▪ Upgrade auxiliary right turn treatment at the intersection with Kidman Way and ensure that there is no cost to the RTS associated with the development	Council	In accordance with the RTA approved Transport Management Plan	Approval of plan by RTA.	
▪ The operator to maintain a log book of extraction quantities, waste deliveries and traffic movements.	Council	Ongoing		

HERITAGE

▪ Implement procedures to investigate and protect culturally significant material if discovered during construction and operation	Site Manager	Prior to commencement of works	<i>Guidelines for Aboriginal Heritage Impact Assessment in the Exploration & Mining Industries</i>	EA Section 7.12.2 and Appendix D of this Response to Submissions
▪ The two surveyor scarred trees will be preserved and protected and a 20 m radius development exclusion zone will be maintained around each tree	Council	Prior to commencement of works		Appendix D of this Response to Submissions
▪ The two Bluedot Speedway signs will be carefully removed and handed over to the car racing club for safe-keeping, reuse or displayed at Griffith Pioneer Park Museum.	Council	Prior to commencement of works		Appendix D of this Response to Submissions

VISUAL AMENITY

<ul style="list-style-type: none"> Erect 2.5m perimeter fence to prevent windblown rubbish leaving the site Ensure rubbish pickup along the fence line and more generally is undertaken regularly 	Site Manager	Prior to commencement of works and ongoing	Number of complaints regarding rubbish	EA Section 7.13.2
<ul style="list-style-type: none"> The landfill will be rehabilitated and revegetated to replicate areas of open grassy woodland. 	Council	Ongoing		EA Section 6.4.4
<ul style="list-style-type: none"> Construct batters with fissures (offset at each bench) and benches to minimise extend of the cut face. These will mimic the natural scarps and reduce the formation of unnatural straight lines. The benches and floor of the quarries will be revegetated with suitable native species 	Quarry Operations Manager and Contractor	Ongoing	<i>NSW Minerals Council Rehabilitation by Design Practice Notes</i> <i>DITR Mine Rehabilitation</i> <i>Landform Design for Rehabilitation 1998</i>	EA Sections 6.3.4 and 7.13.2
<ul style="list-style-type: none"> Ensure strategic landscaping is incorporated into new residential developments within line of sight and in close proximity to the development 	Planning division Council	Ongoing	<i>Griffith Land and Environment Plan</i>	EA Section 7.13.2

SOCIOECONOMIC

<ul style="list-style-type: none"> Maintain ongoing and inclusive consultation with nearby landholders Respond to all community concerns and the complaints register 	Council	All project stages	Number of complaints registered and finalised	EA Sections 7.14 and 7.17
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Appendix B - Asbestos Procedure and Disposal at Tharbogang Waste Management Centre



Asbestos Disposal at Tharbogang Waste Management Centre

Griffith City Council will still be accepting Asbestos at Tharbogang Waste Management Centre; however loads will now have to comply with the following restrictions;

- Asbestos Disposal Days will only be on a Monday and Wednesday between the times of 9am and 12pm
- Customers must book on (02) 69636491 and provide Council employees with the following description;
 - Approximate size of load.
 - Type of asbestos Friable (i.e.: insulation, asbestos fibre) or Non Friable(i.e. roof or fence corrugated sheeting, eave or fibro wall sheeting)
 - Contact name and phone number
 - Registration of the vehicle and trailer that the load will be delivered in to Tharbogang Waste Management Centre main gate for assessment and acceptance.
 - Asbestos Removalist Name and Licence Number
 - Location of site when asbestos has been removed
 - Has load been registered on EPA Waste Locate?
- Loads must be double wrapped in "black builders" type plastic and sealed with "silver duct tape" and loaded onto a pallet.
- Wrapping and taping must be robust enough to allow council employees to handle the asbestos pallet, without the contents breaking through thus exposing the asbestos material contents.
- Council employees will unload the pallet that contains the Asbestos on top of it. During this processes the general public are to remain in their vehicles for their own safety.
- Each loaded pallet must not exceed a height of 10msq and a weight of 100kg.
- Contractors with Large Amounts of asbestos will have to pre arrange the disposal by contacting (02) 69636491. It is important to note that the contractor at their own cost will cover the load at the time of disposal

IMPORTANT NOTICE TO THE PUBLIC

- If a load is deliver to Tharbogang Waste Management Centre and is not declared as asbestos by the customer, then the load will not be accepted until it is wrapped correctly as required above.
- If asbestos is dumped at the Tharbogang internal active tipping site and the offending customer is identified, then a fine will be imposed. The load charge will then be recalculated and the offending customer will be asked to remove the asbestos and wrap it correctly as required above. If the offending customer refuses to remove the asbestos, then a professional asbestos removalist contractor will be engaged and their fee will be passed onto the offending customer.

If you are not sure if it is Asbestos, then always assume it is Asbestos!

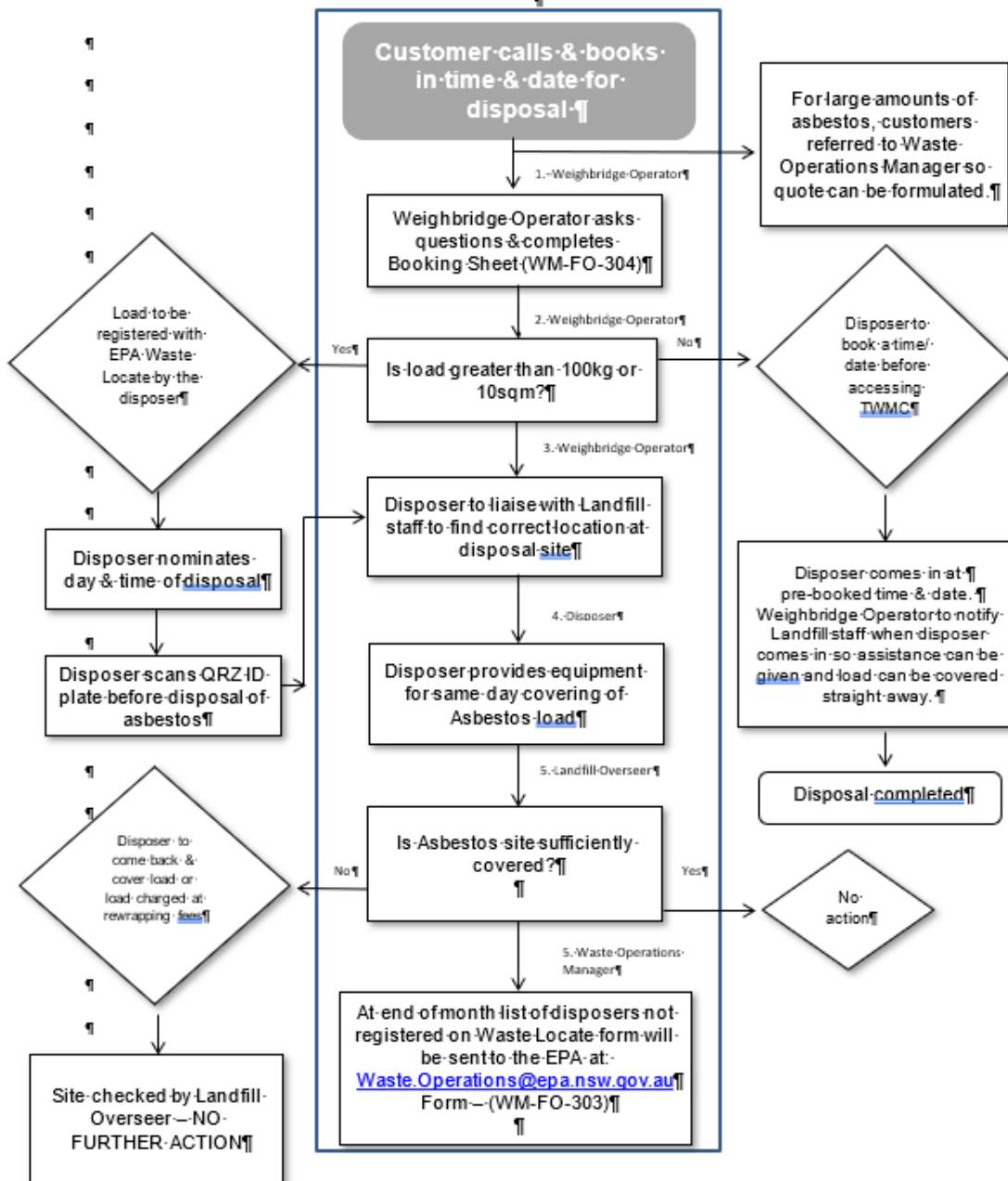
Council employees and the public's safety is Councils priority and adherence to the above procedures and processes will assist this.



WM-PR-013

(WM-PR-013) Asbestos Procedure

Version 5 -- Owner: Waste Operations Manager
Created: 7/10/16 -- Modified: 7/8/18 -- Approved: 11/12/16



Approved: Waste Operations Manager	Group/System: Waste Operations	Document ID: (WM-PR-013)	Version: 5
Relevant: Waste Operations	Date issued: 11/12/20	Revised: 7/8/18	Status: Current

Page: 3 of 10

Appendix C –Standard Form

Extractive Materials Return

2019-2020



Regional
NSW

Form S1 – Period Ending 30 June 2020

Quote RIMS ID in all correspondence

Quarry Id: 1345001 Rims ID: 400354 Operators Name: GRIFFITH CITY COUNCIL Address: PO BOX 485 GRIFFITH NSW 2680 Email: admin@griffith.nsw.gov.au Quarry Name: THARBOGANG QUARRY Quarry Address: LOT 202 HILLSIDE DR	Inquiries please telephone: (02) 4063 6713 Completed or Nil Returns Email – mineral.royalty@planning.nsw.gov.au Postal Address (see below) <i>Please amend name, postal address and location of mine or quarry if incorrect or incomplete.</i>
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The return should be completed and forwarded to **Senior Advisory Officer, RESOURCE ECONOMICS, RESOURCE PLANNING & PROJECTS, DEPARTMENT OF REGIONAL NSW, PO BOX 344 HUNTER REGION MAIL CENTRE NSW 2310** on or before **31 October 2020**. If completion of the return is unavoidably delayed, an application for extension of time should be requested **before** the due date. If no work was done during the year, a **NIL** return must be forwarded.

The return should relate to the **above quarrying establishment** and should cover the operations of quarrying and treatment (such as crushing, screening, washing etc.) carried out at or near the quarry. A return is required even if the operations are solely of a developmental nature and whether the area being worked is held under a mining title or otherwise.

Director, Resource Planning & Projects

Please complete all the following information to assist in identifying the location of the Quarry

Typical Geology: **Sandstone Conglomerate**

Nearest Town to Quarry: **Griffith**

Local Council Name: **Griffith City Council**

Deposited Plan and Lot Number/s of Quarry: **Lot 202 Dp756035**

Email Address of Operator: **nwoods@milbrae.com.au**

Name of Owner or Licensee: **Griffith City Council**

Postal Address of Licensee: **PO Box 485 Griffith NSW 2680**


Licence/Lease Number/s (if any)

From Mining, Exploration & Geoscience (NSW Mineral Resources)

From Crown Lands or other NSW Department: **EPL 5875**

If any output was obtained from land NOT held under licence from the above Departments, state the Name/s and Address/es of the Owners of the land

To the best of my knowledge, information entered in this return is correct and no blank spaces left where figures should have been inserted.

- **SIGNATURE of PROPRIETOR or MANAGER**  **DATE 8/12/2020**
- **CONTACT PERSON for this return:** **John Roser**
- **NAME (Block letters)** **JOHN ROSER** **Telephone: (02) 6962 8162**

Extractive Materials Return

2019-2020



Regional
NSW

Form S1 – Period Ending 30 June 2020

Sales During 2019-2020

Production information may be published in aggregated form for statistical reporting. However, production data for individual operations is kept strictly confidential.

Product	Description	Quantity Tonnes
Virgin Materials		
Crushed Coarse Aggregates		
Over 75mm	Rock Spalls	912.64
Over 30mm to 75mm	40mm Road Gravel	5967.84
5mm to 30mm	20mm Road Gravel	2036.92
Under 5mm		
Natural Sand		
Manufactured Sand		
Prepared Road Base & Sub Base		
Other Unprocessed Materials		
Recycled Materials		
Crushed Coarse Aggregates		
Over 75mm		
Over 30mm to 75mm		
5mm to 30mm		
Under 5mm		
Natural Sand		
Manufactured Sand		
Prepared Road Base & Sub Base		
Other Unprocessed Materials		
River Gravel		
Over 30mm		
5mm to 30mm		
Under 5mm		
Construction Sand	Excluding Industrial	
Industrial Sand		
Foundry, Moulding		
Glass		
Other (Specify)		
Dimension Stone	Building, Ornamental, Monumental	
Quarried in Blocks		
Quarried in Slabs		
Decorative Aggregate	Including Terrazzo	
Loam	Soil for Topdressing, Garden soil, Horticultural purposes)	
TOTAL SITE PRODUCTION		8917.4
Gross Value (\$) of all Sales		\$117,505.48
Type of Material		
Number of Full-Time Equivalent (FTE) Employees	Employees	Contractors

Please Note: A return for clay-based products can be obtained by contacting the inquiry number.