

Appendix P

Consent and EPL Audit Reports

Consent Audit



Independent Environmental Audit Report

For

Bettergrow Pty Ltd

DA140/2016.3

74 Lemington Road, RAVENSWORTH NSW

2330

31 July 2019

Written on behalf of

Bettergrow Pty Ltd

By

The LZ Environmental Company Pty Limited

To	Bettergrow Pty Ltd 74 Lemington Road RAVENSWORTH NSW 2330
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Document Control

Document name	Independent Environmental Audit Report For Bettergrow Pty Ltd DA140/2016.3 74 Lemington Road RAVENSWORTH NSW 2330 31 July 2019	Version	1
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Revision History

Version	Issue Date (dd/mm/yy)	Amendment Details	Author	Authorised By
1	31/07/19	Version 1	Luke Zambelli	Luke Zambelli

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INTRODUCTION

On 25 November 2016, Bettergrow Pty Ltd (Bettergrow) obtained development approval DA140/2016 for composting to be carried out at 74 Lemington Road, RAVENSWORTH NSW 2330, located in the local government area of Singleton Council.

DA140.2016 was modified and reissued as DA140/2016.2 on 16 April 2018 to allow for changes to condition 1.1, 1.6., 1.7 and 4.5. A third modification occurred on 18 December 2018 to allow for changes to condition 1.1, 1.6, 1.7, new condition 1.8 and changes to condition 4.5.

The composting activities have physically commenced and were audited in accordance with the current DA140/2016.3, dated 18 December 2018 by The LZ Environmental Company Pty Limited (Zambelli Environmental).

1.1 Scope of this Audit Report

The scope of this Independent Environmental Audit was to assess compliance of Bettergrow's composting operation in accordance with DA140/2016.3, dated 18 December 2018, issued under the *Environmental Planning and Assessment Act 1979*. This includes a compliance assessment of the General Terms of Approval – Issued, Notice No. 1544342, under the *Protection of the Environment Operations Act 1997*. It is to be noted that the General Terms of Approval was not modified when the previously mentioned modifications to the development approval occurred.

1.2 Methodology

This audit report comprises a review of documents provided by Bettergrow via drop box and interviews of Bettergrow staff. Information contained in this report is current as at the date of this report and may not reflect any event or circumstances which occur after the date of this report.

2 HISTORY OF THE OPERATION

Activities commenced on 24/05/2017 with Compost Pad 1 commencing after certification occurred. As the activity has progressed, a further two pads have been constructed to accommodate the originally approved tonnage receival limit. Subsequent modifications have occurred which has resulted in an increase the types of waste and tonnages allowed to be received for composting. It is considered that the activity has achieved Stage 1 approved works.

The primary focus of the activity has been to compost blends of biosolids and garden organics / greenwaste to create a composted product utilised for mine site rehabilitation. Records show that Bettergrow has the necessary technical skill and capability to create fit for purpose material for such use. It is to be note that only stabilised compost is supplied for mine site rehabilitation. Bettergrow maintains records of temperature to demonstrate that windrows are stable.

There has been no history of complaints or any evidence indicating that environmental harm has occurred. The site is well located for the current activity and it is unlikely that environmental nuisance could be caused due to the control measures that are in place.

3 DISCUSSION OF ENVIRONMENTAL AUDIT FINDINGS

This Audit Report of the Bettergrow composting facility is based on a desktop audit of information provided by Bettergrow to Zambelli Environmental on 17 July 2019, and 22 July 2019. Compliance was audited against conditions of DA140/2016.3 and the General Terms of Approval – Issued, Notice No. 1544342.

It was determined by Zambelli Environmental that there was a high degree of compliance with the development consent.

The terms used in this Audit Report for the assessment of compliance are:

Compliance – YES *That there is compliance with the requirement of the condition.*

Compliance - NO *That there is no compliance with the requirement of the condition.*

Compliance – N/A *Not applicable. Where this occurs, an explanation has been provided.*

In Progress *At the time of the audit aspects of the operation were still under construction and/or were not yet complete.*

Not Activated *The requirement of the condition has not yet been triggered.*

4 ENVIRONMENTAL PERFORMANCE

4.1.1 Noise

There have been no instances of noise complaints since commencement of activities. Noise from plant and equipment utilised on site is barely perceptible when one moves away from the site. Background noise from mining is audible at the site. The site is well positioned from sensitive receptors such that noise would not be audible at the closest sensitive receptor.

4.1.2 Odour

There have been no instances of odour complaints since the commencement of activities. There has been two entries within the complaints register whereby odour was experienced off the working area. One instance was where an employee of Bettergrow observed a neutral composting odour and the second instance was when a person observed an odour offsite. The odour records observed did not highlight any attributing factors. Observation has shown that the blending ratio of mulched organics and biosolids is such that offensive odour is not created. Temperature and pathogen records indicate that material is aerobically composted. Under such conditions, offensive odour creation is limited to non-existent. Discussion with the site manager for the purpose of this audit highlights that the only material released from site is material that has achieved pathogen limits such that the material is considered stable.

4.1.3 Dust

Enough water exists within void 4 to effectively control dust re-entrainment caused by vehicle movement. The haulage road is regularly watered, as to the hardstand pad and composting

windrows. In an email from Bettergrow to Zambelli Environmental on 18.7.2019 records indicate that between 22/06/2018 and 21/06/2019 ~ 6,207.50 tonnes of void 4 water applied to windrows to maintain moisture for composting. There has been no complaints received related to dust liberation.

4.1.4 Surface and Groundwater

The following image portraying the water level marker post positioned within the detention basin was provided by Bettergrow in an email to Zambelli Environmental on 19/07/2019. . The level marker displays visual marked graduations with increments assisting one to quantify the volume of water contained within the dam. In an email from Bettergrow to Zambelli Environmental, incremental volumes were shown corresponding to 200 mm increases in water height.



FIGURE 1: DEPICTING WATER LEVEL MARKER IN DETENTION BASIN

Images also provided by Bettergrow indicate that highly turbid water is not flowing from the site that is not utilised by composting. The following images indicate the water within the lower basin (point of discharge) is not highly turbid. This water is not a result of a release from the leachate detention basin.



FIGURE 2: DEPICTING LOWER BASIN

4.1.5 Drainage, Erosion Control and Nutrient Management

Recent photos provided by Bettergrow in an email to Zambelli Environmental indicates that drainage conditions have not changed since the commencement of the activity. Rock lines drains remain stable. With the effective management of stormwater being displayed, no erosion is occurring.

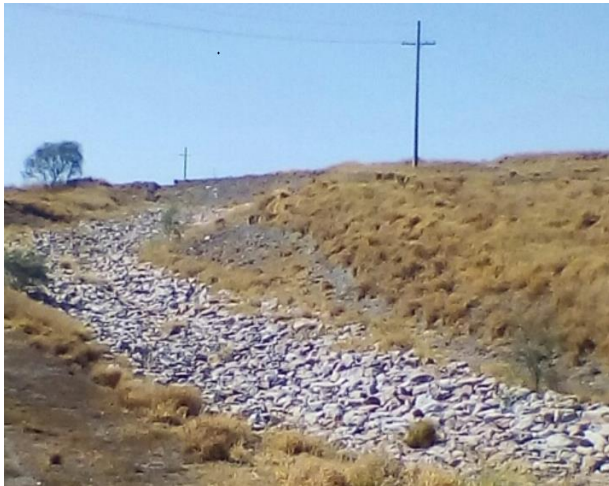


FIGURE 3: DEPICTING ROCK LINED DRAIN THAT RELEASES TO LOW BASIN



FIGURE 4: DEPICTING ENTRANCE SPILLWAY TO LOWER BASIN

Perimeter drainage of compost hardstand pad allows water to drain to the leachate detention basin.



FIGURE 5: DEPICTING NORTHERN DRAIN AT PAD 1 AND PAD 2



FIGURE 6: DEPICTING SHOT CRETE LINED DETENTION BASIN INLET SPILLWAY



FIGURE 7: DEPICTING SHOT CRETE LINED DRAIN EASTERN SIDE OF PAD



FIGURE 8: DEPICTING MOST NORTHERN POINT OF EASTERN DRAIN



FIGURE 9: DEPICTING MOST EASTERN POINT OF NORTHERN PERIMETER DRAIN



FIGURE 10: DEPICTING NORTHERN PERIMETER DRAIN OF PAD 1



FIGURE 11: DEPICTING SHOT CRETE LINED DRAIN UPSTREAM OF DETENTION BASIN INLET SPILLWAY

In relation to nutrient management, review of leachate water quality 29/05/2019 indicated minimal amounts of ammonia, nitrate, slightly elevated TKN and slightly elevated phosphorous within the water column of the leachate detention basin. TOC was elevated at 150 mg/l which is normal for such water emanating from compost hardstand pads. Water is suitable for moisture addition into windrows and also as dust suppression water on the composting hardstand pad. Water is not suitable for release to receiving waters. The Site Manager advised that leachate water is being utilised currently for moisture adjustment within windrows.

4.1.6 Waste

It was confirmed in an email from Bettergrow to Zambelli Environmental on 18/07/2019 waste received from offsite between 22/06/2019 to 21/06/2019 was under the required limit with the following breakdown shown.

Tracking summary material in to Ravensworth			
22/06/2018	21/06/2019		
		Woy Woy	25,225.74
		Newcastle	16,787.10
		Biosolids	16,746.07
		Water to Rows	6,207.50
		Total	64,966.41
		Max limit	76,000.00
		under by	11,033.59

TABLE 1: TONNAGES OF WASTE DELIVERED

4.1.7 Complaints Management

In an email sent from Bettergrow to Zambelli Environmental on 18/07/2019 it was confirmed that the dedicated telephone complaints number is displayed on incoming trucks and the number is 020 4577 6950. The email also confirmed that the telephone number is displayed on Bettergrow's web site under contact us section Enquiry / Complaints: 02 4577 6950 which is diverted to a mobile at night for 24/7 attendance. The following figure is a screen shot of the web site:

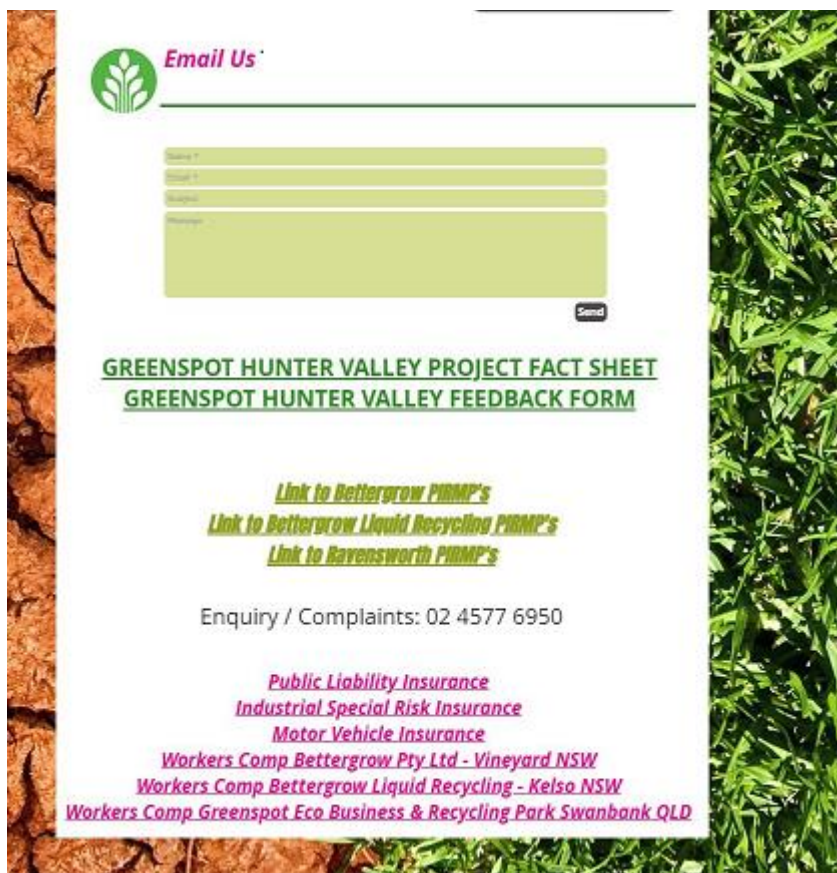


FIGURE 12: SCREENSHOT OF WEB SITE DISPLAYING COMPLAINTS TELEPHONE NUMBER

4.1.8 Training and Awareness

Review of records indicates that regular training of onsite personnel is occurring with competency achieved being recorded. Records indicate that toolbox meetings are utilised to discuss key elements of control including the operation of plant and equipment.

5 REFERENCES AND DOCUMENTS REVIEWED

Information reviewed included recording forms, PIRMP, water quality records, training records, complaints register with all items being made available through drop box. Recent photos indicate that the site is functioning as it was when I was last visited the site (20.2.18). The method adopted for the management of windrows follows the controls that are portrayed within the Compost Management Plan originally created.

6 AUDIT COMPLIANCE TABLES

TABLE 2: COMPLIANCE TABLE DA140/2016.3

Condition No.	Condition	Comments
	GENERAL CONDITIONS	
1.1	The development shall be carried out substantially in accordance with the approved stamped and signed plans and/or documentation listed below except where modified by any following condition. Where the plans relate to alteration or additions only those works shown in colour or highlighted are approved.	<p>Review of plans contained within Dropbox provided by Bettergrow indicate that the activity is being performed in accordance with the approved plans for Stage 1 works.</p> <p>COMPLIANCE: YES</p>

Title/Description	Reference/Drawing No.	Prepared By	Date/s
General Arrangement	Sheet 1 of 6	Tony Mexon & Associates	23 February 2016
Stage 1 Works	Sheet 3 of 6	Tony Mexon & Associates	23 February 2016
Stage 2 Works	Sheet 4 of 6	Tony Mexon & Associates	23 February 2016
Cross Section A-A	Sheet 5 of 6	Tony Mexon & Associates	23 February 2016
Cross Section C-C	Sheet 6 of 6	Tony Mexon & Associates	23 February 2016
Surface and Groundwater Management Plan Version 7	N/A	Bio-Recycle Australia Pty Ltd	3 August 2016
Statement of Environmental Effects	N/A	AECOM	15 July 2016
Statement of Environmental Effects Section 96 Application – Ravensworth Composting Facility	N/A	JACOBS	6 February 2018
Statement of Environmental Effects – Modification 2	IA197800_01	JACOBS	19 September 2018

Note 1: Modifications to the approved plans will require the lodgement and consideration by Council of a modification pursuant to Section 4.55 of the Environmental Planning and Assessment Act, 1979.

	Note 2: The approved plans and supporting documentation may be subject to conditions imposed under section 4.17(1)(g) of the Act modifying or amending the development (refer to conditions of consent which must be satisfied prior to the issue of any Construction Certificate).	
1.2	<p>Damage on Council Assets</p> <p>Any existing infrastructure damaged due to the proposed works including, but not limited to, (roads, services, drainage, pipes, guardrails, etc.) is to be repaired or replaced at the applicant's expense. The Applicant must notify Singleton Council Infrastructure or Development Engineering immediately when the structure is damaged.</p>	<p>In an email from Bettergrow to Zambelli Environmental on 16 July 2019 it was confirmed that no damage to existing infrastructure has occurred.</p> <p>COMPLIANCE: YES</p>
1.3	<p>Road Act Approval</p> <p>In case of any asset damage along Lemington Road (from the New England Highway to the entrance of the mining site) the applicant is to submit a Section 138 application in order to obtain a permit with conditions prior to starting works on Council Road Reserve, and at the end, a Certificate of Compliance from Singleton Council Infrastructure Department is to be obtained. All works are to be carried out in accordance with the Singleton Council Development Construction Specifications and details are to be submitted at the time of the application.</p>	<p>There has been no case of asset damage.</p> <p>Compliance: Not Activated</p>
1.4	<p>Legal Drainage Point of Discharge</p> <p>All stormwater from the working area must be directed to a lawful point of discharge such that it does not adversely affect surrounding or downstream properties.</p>	<p>In an email from Bettergrow to Zambelli Environmental on 16 July 2019 it was confirmed that there has been no change to the legal point of discharge has occurred.</p> <p>COMPLIANCE: YES</p>

<p>1.5</p>	<p>Leachate Dam Design Singleton Council request a Compliance Certificate from a qualified practicing Geotechnical/Dams Engineer stating structural adequacy of the dam and that earthworks have been carried out in accordance with the AS 3798-2007 – Guidelines on Earthworks for Commercial and Residential Developments. The Compliance Certificate along with any correspondence from the Environmental Protection Authority EPA must be submitted to Council prior to filling of the dam</p>	<p>In an email from Bettergrow to Zambelli Environmental on 16 July 2019 it was confirmed that an as built detention basin plan was submitted to council. As built dam plan reflects detention basin on site.</p> <p>In an email provided to Zambelli Environmental on 16 July 2019, Bettergrow provided a Construction Report prepared by Aurecon. Aurecon concluded that the detention basin had been constructed to required standards.</p> <p>COMPLIANCE: YES</p>
<p>1.6</p>	<p>Leachate Management Dam Capacity Singleton Council request a Compliance Certificate from a qualified practicing Hydraulic Engineering Consultancy Company stating that the capacity of the existing dam is adequate to cope with the increment of leachate. The Compliance Certificate along with any correspondence from the Environmental Protection Authority EPA must be submitted to Council prior to increasing the amount of composting material.</p>	<p>In an email from Bettergrow to Zambelli Environmental on 16 July 2019 cumulative volumes for the detention basin were provided which demonstrated the capacity of the detention basin as leachate increases in height in 200 mm increments.</p> <p>Bettergrow provided a photo indicating the marker pole in place in an email received at Zambelli Environmental on 19/07/2019.</p> <p>Compliance: Yes</p>

1.7	<p>Road Impact Assessment Prior to the commencement of the on-site composting increment, the applicant/contractor is to prepare a Road Condition Report of Lemington Road (from the New England Highway to the entrance of the mining site), identifying all existing problems with this section of the roadway. On completion, a joint inspection between the applicant and Council Officers to identify any further damage is to be carried out. If any additional damage has occurred, all rectification works shall be at the applicant’s expense, to the satisfaction of the Council Infrastructure Department. The report is to contain (but not limited to): location of existing deficiencies of the roadway and site photos, especially at areas where turning movements will occur. Condition during the ongoing use of the development</p>	<p>In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that:</p> <ul style="list-style-type: none"> • an inspection was conducted and condition report prepared • a joint inspection took place with Council. No was damage observed and no areas were identified requiring rectification. <p>COMPLIANCE: YES</p>
1.8	<p>Section 138 Roads Act 1993 Prior to any works commencing on Council Road Reserve, the applicant is to submit a Section 138 Application in order to obtain a permit with conditions from the Infrastructure Department.</p>	<p>There has been no need to activate this condition.</p> <p>Compliance: Not Activated</p>
CONDITION DURING THE ONGOING USE OF THE DEVELOPMENT		
2.1	<p>Waterways Contamination All reasonable and practicable measures must be taken to prevent pollution of any existing waterways as a result of silt or untreated leachate run-off, and oil or grease spills from any machinery. Wastewater for cleaning equipment must not be discharged or indirectly to any watercourses or stormwater systems.</p>	<p>In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that:</p> <ul style="list-style-type: none"> • all stormwater generated on the compost pad gets directed to the leachate detention basin. • there have been no releases from the compost hardstand area to void 4 since commencement of the activity.

		<ul style="list-style-type: none"> all machinery and equipment wash-downs are performed on the hardstand pad that is connected to the leachate detention basin. <p>In an email from Bettergrow to Zambelli Environmental on 16/07/2019 it was demonstrated that the hardstand pads did achieve appropriate density and permeability. Review of report titled Ravensworth Leachate Barrier Certification prepared by RCA Australia occurred.</p> <p>In an email from Bettergrow to Zambelli Environmental on 16/07/2019 it was demonstrated that the detention basin servicing the compost pad achieved appropriate density and permeability. Review of report titled Ravensworth Composting Pad Leachate Detention Basin prepared by Aurecon occurred.</p> <p>COMPLIANCE: YES</p>
	INTEGRATED DEVELOPMENT TERMS OF APPROVAL	
3.1	Integrated Development General Terms of Approval	COMPLIANCE: YES

	<p>The following approval bodies have given general terms of approval in relation to the development, as referred to in Section 7.4 of the Environmental Planning and Assessment Act 1979:</p> <p>1. NSW Environment Protection Authority</p> <p>The applicant is to comply with all general terms of approval provided by the NSW Environment Protection Authority Notice No: 1544342. All records and reports required under the General Terms of Approval must be made available to Council within 48 hours of any request by Council.</p> <p>A copy of the General Terms of Approval is attached and forms part of the development consent.</p>	
	ADVICES	
4.1	<p>Lapsing of Consent</p> <p>In accordance with Section 4.53 of the Environmental Planning and Assessment Act 1979 (as amended), this Development Consent lapses five (5) years after the date from which it operates unless building, engineering or construction work has substantially physically commenced. The building must be completed, in accordance with the approved plans and specifications, within five (5) years from the date when the building was substantially physically commenced.</p>	<p>Stage 1 works have been completed.</p> <p>Compliance: Yes</p>
4.2	<p>Process for Modification</p> <p>The plans and/or conditions of this Consent are binding and may only be modified upon written request to Council under Section 4.55 of the Environmental Planning and Assessment Act, 1979 (as amended). The request shall be accompanied by the appropriate fee and application form. You are not to commence any action, works, contractual negotiations, or the like, on the requested modification unless and until the written authorisation of Council is received by way of an amended consent.</p>	<p>Noted. Activities have not commenced until amended consent has been received.</p> <p>Compliance: Yes</p>
4.3	Review of Determination	Noted.

	In accordance with the provisions of Section 8.2 of the Environmental Planning and Assessment Act 1979 (as amended) the applicant can request Council to review this determination. The request must be made within a period of 6 months from the date shown on this determination. A fee, as prescribed under Council's current Management Plan - Fees and Charges, is payable for such a review.	
4.4	<p>88B Instrument</p> <p>An 88B Instrument made pursuant to the Conveyancing Act 1919 applies to the subject land and it is the owners/applicants responsibility to check the compliance of the works with the instrument.</p>	<p>In an email sent from Bettergrow to Zambelli Environmental on 23.7.19 it was confirmed that an agreement on access to the site with AGL is in place. Review of plan titled – Concept Plan Showing Composting Site of Part of Lot 3 DP119186 Being AGL Macquarie Pty Ltd’s Ravensworth Void 3 Sheet 1 prepared by Tony Mexon and Associates identifies the current access route.</p> <p>Compliance: Yes</p>
4.5	<p>Other Permits and Approvals</p> <p>Approval shall be sought from the New South Wales Environment Protection Authority for the amendment of Environment Protection License number 7654, to allow for the composting of up to 76,000 tonnes per annum. An amended Environment Protection License must be granted by the New South Wales Environment Protection Authority prior to the increase of composting above 50,000 tonnes per annum.</p>	<p>Review of NSW EPA’s EPL register confirms that a modified EPL was issued on 14 June 2018 which limits in total 76,000 tonnes of waste received offsite.</p> <p>In an email received from Bettergrow to Zambelli Environmental on 18/07/2019 waste received from offsite between 22/06/2019 to 21/06/2019 was under the required limit.</p>

		Compliance: Yes
	OTHER APPROVALS	
	<u>Local Government Act 1993 approvals granted under s 4.12 (5)</u> N/A	Noted.
	<u>General terms of other approvals integrated as part of the consent (list approvals)</u> <ul style="list-style-type: none"> • Mine Subsidence Compensation Act 1961 • Protection of the Environment Operations Act 1997 	

TABLE 3: COMPLIANCE TABLE NOTICE NO. 1544342, GENERAL TERMS OF APPROVAL - ISSUED, DA140/2016

<p><u>Attachment A - General Terms of Approval</u></p> <p>Administrative Conditions</p> <p>Information supplied to the EPA</p> <ul style="list-style-type: none"> • Except as expressly provided by these general terms of approval, works and activities must be carried out in accordance with the proposal contained in: <ul style="list-style-type: none"> – the development application DA140/2016 submitted by Singleton Council to the NSW Environment Protection Authority on 29 August 2016; – "Statement of Environmental Effects – Composting Facility, Ravensworth No. 2 Mine", AECOM, 15 July 2016, relating to the development; and – all additional documents supplied to the EPA in relation to the development, including "Surface and Groundwater Management Plan for the Greenspot Ravensworth Composting Facility", The LZ Environmental Company Pty Ltd, 3 August 2016. 	<p>It is confirmed from this audit that the site continues to be operated in the way it was proposed to function. Zambelli Environmental was involved in the commencement of activities and provided close assistance to management and onsite personnel to ensure all aspects of the activity were performed appropriately so that compliance could be assured. This audit has concluded that this has not changed.</p>
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<p>Fit and Proper Person</p> <ul style="list-style-type: none"> The applicant must, in the opinion of the EPA, be a fit and proper person to hold a licence under the <i>Protection of the Environment Operations Act 1997</i>, having regard to the matters in section 83 of that Act. 	<p>It is the opinion of the author that Bettergrow is a fit and proper to undertake the activity and hold the EPL.</p> <p>Compliance: Yes</p>
<p>Limit Conditions</p> <p>Pollution of waters</p> <ul style="list-style-type: none"> Except as may be expressly provided by a licence under the <i>Protection of the Environment Operations Act 1997</i> in relation of the development, section 120 of the <i>Protection of the Environment Operations Act 1997</i> must be complied with in and in connection with the carrying out of the development. No leachate is permitted to be discharged from the operating area and utilisation area of the premises. 	<p>No discharge has occurred from the leachate detention basin servicing the compost hardstand pad.</p> <p>Compliance: Yes</p>

Waste				
<ul style="list-style-type: none"> The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing, or disposal, except the wastes and activities expressly referred to in the table below. The storage of waste permitted to be received at the premises is subject to the limits or conditions, if any, referred to in the column titled "Other Limits" in the table below. This condition does not limit any other conditions in this licence. 				
Code	Waste	Description	Activity	Other Limits
NA	Garden Waste	As defined in Schedule 1 of the POEO Act, in force from time to time	Composting	NA
NA	Wood Waste	As defined in Schedule 1 of the POEO Act, in force from time to time	Composting	NA
NA	Biosolids categorised as unrestricted use, or as restricted use 1, 2 or 3, in accordance with the criteria set out in the	As defined in Schedule 1 of the POEO Act, in force from time to time	Composting	NA

It was confirmed in an email from Bettergrow to Zambelli Environmental on 18/07/2019 waste received from offsite between 22/06/2019 to 21/06/2019 was under the required limit and that only biosolids, garden organics/greenwaste and water from void 4 was received for composting.

Compliance: Yes

<table border="1"> <tr> <td></td> <td>biosolids guidelines</td> <td></td> <td></td> <td></td> </tr> <tr> <td>NA</td> <td>Processed fibrous organics</td> <td>As defined in Schedule 1 of the POEO Act, in force from time to time</td> <td>Composting</td> <td>NA</td> </tr> <tr> <td>NA</td> <td>Liquid Waste</td> <td>Hydro excavation and drill slurry</td> <td>Composting</td> <td>NA</td> </tr> <tr> <td>NA</td> <td>General Solid Waste</td> <td>Fly ash and Lime</td> <td>Composting</td> <td>NA</td> </tr> <tr> <td>NA</td> <td>Animal Waste</td> <td>As defined in Schedule 1 of the POEO Act, in force from time to time</td> <td>Composting</td> <td>NA</td> </tr> </table>						biosolids guidelines				NA	Processed fibrous organics	As defined in Schedule 1 of the POEO Act, in force from time to time	Composting	NA	NA	Liquid Waste	Hydro excavation and drill slurry	Composting	NA	NA	General Solid Waste	Fly ash and Lime	Composting	NA	NA	Animal Waste	As defined in Schedule 1 of the POEO Act, in force from time to time	Composting	NA	
	biosolids guidelines																													
NA	Processed fibrous organics	As defined in Schedule 1 of the POEO Act, in force from time to time	Composting	NA																										
NA	Liquid Waste	Hydro excavation and drill slurry	Composting	NA																										
NA	General Solid Waste	Fly ash and Lime	Composting	NA																										
NA	Animal Waste	As defined in Schedule 1 of the POEO Act, in force from time to time	Composting	NA																										
<ul style="list-style-type: none"> The total amount of waste to be stored at the premises at any one time must not exceed 35,000 tonnes. 					<p>Note that on EPL No. 7654 - 14 June 2018, Condition L3.2 allows for the annual receipt of 76,000 tonnes of waste.</p> <p><i>L3.2 The total amount of waste referred to in the table above, must not exceed 76,000 tonnes</i></p>																									

	<p><i>received from offsite per year.</i></p> <p>These two conditions conflict with each other. However, given the fact that condition L3.2 was subject to a variation to allow for an increase from 50,000 tonnes (subject to an earlier variation) to 76,000 tonnes, condition L3.2 prevails. This Audit Report does not include a compliance assessment of EPL No. 7654. Compliance with this condition cannot be enforced because of the variation to the EPL. COMPLIANCE: N/A</p>
<p>Hours of operation</p> <ul style="list-style-type: none"> The premises can operate between 6 a.m. and 6 p.m. Monday to Saturday. 	<p>In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that:</p> <ul style="list-style-type: none"> no operations occur on Sunday.

	<ul style="list-style-type: none"> • emergency delivery of greenwaste may occur at the entrance but not on Sundays. This has only happened once since commencement of activities due to weather and it was not a Sunday. <p>COMPLIANCE: YES</p>
<p>Operating Conditions</p> <p>Odour</p> <p><i>Note: The POEO Act states that no offensive odour may be emitted from particular premises unless potentially offensive odours are identified in the licence and the odours are emitted in accordance with conditions specifically directed at minimising the odours are permitted.</i></p> <ul style="list-style-type: none"> • No offensive odour is permitted to be emitted from the premises at any time. 	<p>In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that:</p> <ul style="list-style-type: none"> • there were no odour complaints since commencement of the activities as confirmed within the register. <p>COMPLIANCE: YES</p>

<p>Dust</p> <ul style="list-style-type: none">• Activities occurring at the premises must be carried out in a manner that will minimise emissions of dust from the premises.• Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	<p>In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that:</p> <ul style="list-style-type: none">• Bettergrow track the amount of water delivered to windrows.• regular spraying of water occurs to suppress dust.• volumes used for dust suppression have been recorded.• trucks entering or leaving the site that are carrying loads are covered. <p>There has been no dust complaint lodged with Bettergrow.</p> <p>Compliance: Yes</p>
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<p>Activities must be carried out in a competent manner</p> <ul style="list-style-type: none"> • Licensed activities must be carried out in a competent manner. This includes: <ul style="list-style-type: none"> – the processing, handling, movement and storage of materials and substances used to carry out the activity; and – the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. 	<p>It is the opinion of Zambelli Environmental that the activity continues to be carried out in a competent manner. The audit did not highlight any inappropriate practices.</p> <p>Compliance: Yes</p>
<p>Maintenance of plant and equipment</p> <ul style="list-style-type: none"> • All plant and equipment installed at the premises or used in connection with the licensed activity: <ul style="list-style-type: none"> – must be maintained in a proper and efficient condition; and – must be operated in a proper and efficient manner. 	<p>Bettergrow confirmed that plant and equipment are maintained and serviced regularly. Bettergrow provided a maintenance register via drop box for review. Information recorded indicates that specific plant and equipment are being serviced regularly.</p> <p>Compliance: Yes</p>

<p>Erosion and Sediment Control</p> <ul style="list-style-type: none"> An Erosion and Sediment Control Plan (ESCP) must be prepared and implemented. The plan must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction and operating activities. 	<p>The management and control of sediment and erosion continues to follow the guidance provided within the document titled Surface and Groundwater Management Plan prepared by Zambelli Environmental. Photos of drainage indicate that appropriate controls are in place and are being maintained.</p> <p>Compliance: Yes</p>
<p>Leachate Application Area</p> <ul style="list-style-type: none"> Leachate must only be applied to the following areas: the Irrigation Area as demonstrated in the map titled "Appendix 3 – Figure 5: Erosion and Sediment Control Plan" within the Surface and Groundwater Management Plan prepared by the LZ Environmental Company Pty Limited and dated 3/8/2016. Spray from leachate application must not drift beyond the boundary of the leachate application area to which it is applied. The leachate application area must effectively utilise the leachate applied to those areas. This includes the use for pasture or crop production, as well as ensuring the soil is able to absorb the nutrients, salts, hydraulic load and organic materials in the solids or liquids. Monitoring of land and receiving waters to determine the impact of leachate application may be required by the licensee. 	<p>Confirmation from the Site Manager indicates that leachate contained within the detention basin has been used for composting windrows. No leachate has been irrigated.</p> <p>Compliance: Yes</p>

<p>Emergency Response</p> <ul style="list-style-type: none">• The licensee must prepare, maintain and implement as necessary a Pollution Incident Response Plan (PIRMP) for the premises. The licensee must keep the incident response plan on the premises at all times. The incident response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment.• The PIRMP must be tested annually at a minimum of following a pollution incident. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date. <p><i>Note: The licensee must develop their PIRMP in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulations 2009.</i></p>	<p>A review of drop box indicated that Version 4 of the PIRMP is in place. Records indicate the PIRMP was first tested on 16.01.19 and was activated on 15/05/19 in relation to an identified hazard (culvert on haulage road) which resulted in incident report and corrective actions being recorded.</p> <p>Compliance: Yes</p>
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<p>Monitoring and Recording Conditions</p> <p><i>Monitoring records</i></p> <ul style="list-style-type: none"> • 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. • All records required to be kept by this licence must be: <ul style="list-style-type: none"> – 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. • The following records must be kept in respect of any samples required to be collected for the purposes of this licence: <ul style="list-style-type: none"> – 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. 	<p>All monitoring required is being performed. Required water monitoring locations are being monitored albeit on some occasions the leachate detention basin has been dry.</p> <p>Review of historical data indicates Pt 3 water tank water quality, which receives water from void 4 is consistent. Leachate detention basin water contains less salt than void 4 water. Nutrients are low within the leachate detention basin water. Sample events are tracked in sample register.</p> <p>Compliance: Yes</p>
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<p>Recording of pollution complaints</p> <ul style="list-style-type: none"> • The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies. • The record must include details of the following: <ul style="list-style-type: none"> – the date and time of the complaint; – the method by which the complaint was made; – any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; – the nature of the complaint; – the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and – if no action was taken by the licensee, the reasons why no action was taken. • The record of a complaint must be kept for at least 4 years after the complaint was made. • The record must be produced to any authorised officer of the EPA who asks to see them. 	<p>Review of the complaints register indicates that there has been no complaints related to pollution since the commencement of the activity.</p> <p>Compliance: Yes</p>
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<p>Telephone complaints line</p> <ul style="list-style-type: none">• The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.• The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.• This condition does not apply until 3 months after this condition takes effect.	<p>In an email from Bettergrow to Zambelli Environmental, it was confirmed that a complaints telephone line does exist. Section 4.17 provides further detail.</p> <p>Compliance: Yes</p>
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<p>Reporting Conditions</p> <p>Annual Returns</p> <ul style="list-style-type: none"> • The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: <ul style="list-style-type: none"> – Statement of Compliance; and – Monitoring and Complaints Summary. • A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA. • An Annual Return must be prepared in respect of each reporting, except as provided below: <ul style="list-style-type: none"> – Where this licence is transferred from the licensee to a new licensee: <ol style="list-style-type: none"> a. the transferring licensee must prepare an annual return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b. the new licensee must prepare an annual return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. <p><i>Note: An application to transfer a licence must be made in the approved form for this purpose.</i></p> <ul style="list-style-type: none"> – Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an annual return in respect of the period commencing on the first day of the reporting period and ending on: 	<p>In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that:</p> <ul style="list-style-type: none"> • annual returns were submitted within 60 days after the end of each reporting period. • Review of annual returns submitted by Bettergrow and contained within drop box indicates that annual returns are being filled out correctly. <p>Compliance: Yes</p>
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<ul style="list-style-type: none"> a. in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b. in relation to the revocation of the licence – the date from which notice revoking the licence operates. <ul style="list-style-type: none"> • The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date'). • The licensee must retain a copy of the annual return supplied to the EPA for a period of at least 4 years after the annual return was due to be supplied to the EPA. • Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: <ul style="list-style-type: none"> – the licence holder; or – by a person approved in writing by the EPA to sign on behalf of the licence holder. 	
<p>Notification of environmental harm</p> <p><i>Note: The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act</i></p> <ul style="list-style-type: none"> • Notifications must be made by telephoning the EPA's Pollution Line service on 131 555. • The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. 	<p>In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that:</p> <ul style="list-style-type: none"> • no calls to the pollution line - 131 555 have been made. <p>It has been confirmed via discussion with Bettergrow that no</p>

	<p>environmental harm has been caused since the commencement of activities.</p> <p>Compliance: Yes</p>
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<p>Written report</p> <ul style="list-style-type: none"> • Where an authorised officer of the EPA suspects on reasonable grounds that: <ul style="list-style-type: none"> – where this licence applies to premises, an event has occurred at the premises; or – where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, – and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event. • The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request. The request may require a report which includes any or all of the following information: <ul style="list-style-type: none"> – the cause, time and duration of the event; – the type, volume and concentration of every pollutant discharged as a result of the event; – the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; and – the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; – action taken by the licensee in relation to the event, including any follow-up contact with any complainants; – details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; – any other relevant matters. • The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request. • The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request. 	
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<p>General Conditions</p> <p><i>Copy of licence kept at the premises or on the vehicle or mobile plant</i></p> <ul style="list-style-type: none">• A copy of this licence must be kept at the premises or on the vehicle or mobile plant to which the licence applies.• The licence must be produced to any authorised officer of the EPA who asks to see it.• The licence must be available for inspection by any employee or agent of the licensee working at the premises or operating the vehicle or mobile plant.	<p>In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that a copy of the EPL is located on site.</p> <p>Compliance: Yes</p>
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Environment Protection Licence Audit



Independent Environmental Audit Report

For

Bio-Recycle Australia Proprietary Limited

Environmental Protection Licence

No. 7654

74 Lemington Road,

RAVENSWORTH NSW 2330

31 July 2019

Written on behalf of

Bio-Recycle Australia Proprietary Limited

By

The LZ Environmental Company Pty Limited

To	Bio-Recycle Australia Proprietary Limited 74 Lemington Road RAVENSWORTH NSW 2330
From	The LZ Environmental Company Pty Limited T/A Zambelli Environmental 56 Leah Avenue Salisbury QLD 4107 Contact : Luke Zambelli, Director, B.Eng. (Env) Mobile : 0431 27 28 24 luke@zambellienvironmental.com.au ABN 29 127 162 163

Document Control

Document name	Independent Environmental Audit Report For Bio-Recycle Australia Proprietary Limited Environmental Protection Licence No. 7654 74 Lemington Road RAVENSWORTH NSW 2330 26 July 2019	Version	1
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Revision History

Version	Issue Date (dd/mm/yy)	Amendment Details	Author	Authorised By
1	31/07/19	Version 1	Luke Zambelli	Luke Zambelli

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INTRODUCTION

Bio-Recycle Australia Proprietary Limited hold Environmental Protection Licence (EPL) Number 7654, dated 14 June 2018, for composting (>50,000 T annual capacity to receive organics) to be carried out at 74 Lemington Road, RAVENSWORTH NSW 2330, located in the local government area of Singleton Council.

The composting activities have physically commenced and have been audited in accordance with EPL 7654 by The LZ Environmental Company Pty Limited (Zambelli Environmental).

1.1 Scope of this Audit Report

The scope of this Independent Environmental Audit was to assess compliance of Bettergrow's composting operation in accordance with EPL 7654, issued under the *Protection of the Environment Operations Act 1997*.

1.2 Methodology

This audit report comprises a desktop review of documents provided by Bettergrow and interviews of Bettergrow staff. Information contained in this report is current as at the date of this report, and may not reflect any event or circumstances which occur after the date of this report.

2 HISTORY OF THE OPERATION

Activities commenced on 24/05/2017 with Compost Pad 1 commencing after certification occurred. As the activity has progressed, a further two pads have been constructed to accommodate the originally approved tonnage receival limit. Subsequent variations have occurred to the EPL which has resulted in an increase the types of waste and tonnages allowed to be received for composting. It is considered that the activity has achieved Stage 1 approved works.

The primary focus of the activity has been to compost blends of biosolids and garden organics / greenwaste to create a composted product utilised for mine site rehabilitation. Records show that Bettergrow has the necessary technical skill and capability to create fit for purpose material for such use. It is to be note that only stabilised compost is supplied for mine site rehabilitation. Bettergrow maintains records of temperature to demonstrate that windrows are stable.

There has been no history of complaints or any evidence indicating that environmental harm has occurred. The site is well located for the current activity and it is unlikely that environmental nuisance could be caused due to the control measures that are in place.

3 DISCUSSION OF ENVIRONMENTAL AUDIT FINDINGS

This Audit Report of the Bettergrow composting facility is based on a desktop audit of information provided by Bettergrow to Zambelli Environmental on 17 July 2019, and 31 July 2019. Compliance was audited against conditions of EPL7654– Licence version date 14-Jun-2018.

It was determined by Zambelli Environmental that there was a high degree of compliance with the EPL.

The terms used in this Audit Report for the assessment of compliance are:

Compliance – YES *That there is compliance with the requirement of the condition.*

Compliance - NO *That there is no compliance with the requirement of the condition.*

Compliance – N/A *Not applicable. Where this occurs, an explanation has been provided.*

In Progress *At the time of the audit aspects of the operation were still under construction and/or were not yet complete.*

Not Activated *The requirement of the condition has not yet been triggered.*

4 ENVIRONMENTAL PERFORMANCE

4.1.1 Noise

There have been no instances of noise complaints since commencement of activities. Noise from plant and equipment utilised on site is barely perceptible when one moves away from the site. Background noise from mining is audible at the site. The site is well positioned from sensitive receptors such that noise would not be audible at the closest sensitive receptor.

4.1.2 Odour

There have been no instances of odour complaints since the commencement of activities. There has been two entries within the complaints register whereby odour was experienced off the working area. One instance was where an employee of Bettergrow observed a neutral composting odour and the second instance was when a person observed an odour offsite. The odour records observed did not highlight any attributing factors. Observation has shown that the blending ratio of mulched organics and biosolids is such that offensive odour is not created. Temperature and pathogen records indicate that material is aerobically composted. Under such conditions, offensive odour creation is limited to non-existent. Discussion with the site manager for the purpose of this audit highlights that the only material released from site is material that has achieved pathogen limits such that the material is considered stable.

4.1.3 Dust

Enough water exists within void 4 to effectively control dust re-entrainment caused by vehicle movement. The haulage road is regularly watered, as to the hardstand pad and composting windrows. In an email from Bettergrow to Zambelli Environmental on 18.7.2019 records indicate that between 22/06/2018 and 21/06/2019 ~ 6,207.50 tonnes of void 4 water applied to windrows to maintain moisture for composting. There has been no complaints received related to dust liberation.

4.1.4 Surface and Groundwater

The following image portraying the water level marker post positioned within the detention basin was provided by Bettergrow in an email to Zambelli Environmental on 19/07/2019. . The level marker displays visual marked graduations with increments assisting one to quantify the volume of water contained within the dam. In an email from Bettergrow to Zambelli Environmental, incremental volumes were shown corresponding to 200 mm increases in water height.



FIGURE 1: DEPICTING WATER LEVEL MARKER IN DETENTION BASIN

Images also provided by Bettergrow indicate that highly turbid water is not flowing from the site that is not utilised by composting. The following images indicate the water within the lower basin (point of discharge) is not highly turbid. This water is not a result of a release from the leachate detention basin.



FIGURE 2: DEPICTING LOWER BASIN

4.1.5 Drainage, Erosion Control and Nutrient Management

Recent photos provided by Bettergrow in an email to Zambelli Environmental indicates that drainage conditions have not changed since the commencement of the activity. Rock lines drains remain stable. With the effective management of stormwater being displayed, no erosion is occurring.

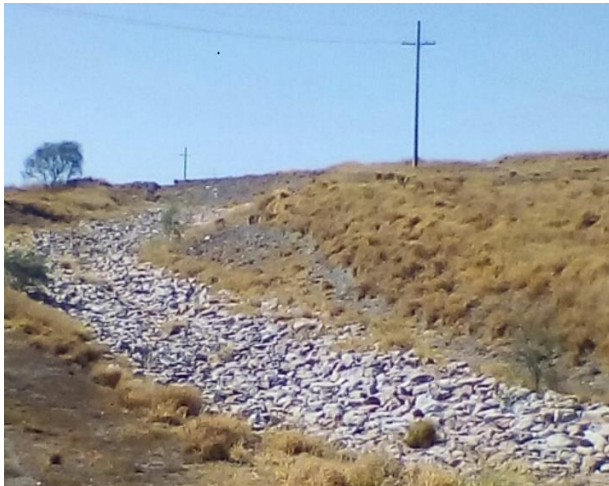


FIGURE 3: DEPICTING ROCK LINED DRAIN THAT RELEASES TO LOW BASIN



FIGURE 4: DEPICTING ENTRANCE SPILLWAY TO LOWER BASIN



FIGURE 5: DEPICTING NORTHERN DRAIN LOOKING EAST



FIGURE 6: DEPICTING SHOT CRETE LINED DETENTION BASIN INLET SPILLWAY



FIGURE 7: DEPICTING SHOT CRETE LINED DRAIN EASTERN SIDE OF PAD



FIGURE 8: DEPICTING MOST NORTHERN POINT OF EASTERN DRAIN



FIGURE 9: DEPICTING MOST EASTERN POINT OF NORTHERN PERIMETER DRAIN



FIGURE 10: DEPICTING NORTHERN PERIMETER DRAIN OF PAD 1



FIGURE 11: DEPICTING SHOT CRETE LINED DRAIN UPSTREAM OF DETENTION BASIN INLET SPILLWAY

In relation to nutrient management, review of leachate water quality 29/05/2019 indicated minimal amounts of ammonia, nitrate, slightly elevated TKN and slightly elevated phosphorous within the water column of the leachate detention basin. TOC was elevated at 150 mg/l which is normal for such water emanating from compost hardstand pads. Water is suitable for moisture addition into windrows and also as dust suppression water on the composting hardstand pad. Water is not suitable for release to receiving waters. The Site Manager advised that leachate water is being utilised currently for moisture adjustment within windrows.

4.1.6 Waste

It was confirmed in an email from Bettergrow to Zambelli Environmental on 18/07/2019 waste received from offsite between 22/06/2019 to 21/06/2019 was under the required limit with the following breakdown shown.

Tracking summary material in to Ravensworth			
22/06/2018	21/06/2019		
		Woy Woy	25,225.74
		Newcastle	16,787.10
		Biosolids	16,746.07
		Water to Rows	6,207.50
		Total	64,966.41
		Max limit	76,000.00
		under by	11,033.59

TABLE 1: TONNAGES OF WASTE DELIVERED

4.1.7 Complaints Management

In an email sent from Bettergrow to Zambelli Environmental on 18/07/2019 it was confirmed that the dedicated telephone complaints number is displayed on incoming trucks and the number is 020 4577 6950. The email also confirmed that the telephone number is displayed on Bettergrow's web site under contact us section Enquiry / Complaints: 02 4577 6950 which is diverted to a mobile at night for 24/7 attendance. The following figure is a screen shot of the web site:

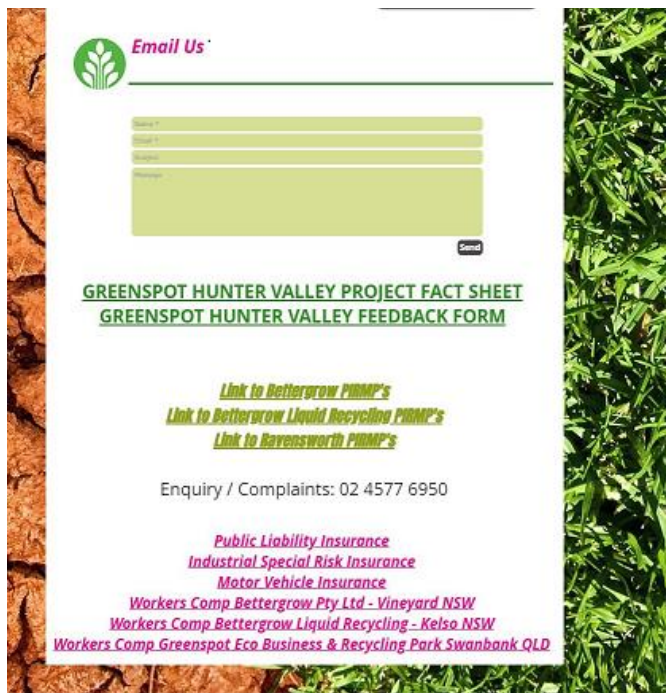


FIGURE 12: SCREENSHOT OF WEB SITE DISPLAYING COMPLAINTS TELEPHONE NUMBER

4.1.8 Training and Awareness

Review of records indicates that regular training of onsite personnel is occurring with competency achieved being recorded. Records indicate that toolbox meetings are utilised to discuss key elements of control including the operation of plant and equipment.

5 REFERENCES AND DOCUMENTS REVIEWED

Information reviewed included recording forms, PIRMP, water quality records, training records, complaints register with all items being made available through drop box. Recent photos indicate that the site is functioning as it was when I was last visited the site (20.2.18). The method adopted for the management of windrows follows the controls that are portrayed within the Compost Management Plan originally created.

7 AUDIT COMPLIANCE TABLE

TABLE 2: COMPLIANCE TABLE ENVIRONMENTAL PROTECTION LICENCE NO. 7654

Condition No.	Condition	Comments						
1	Administrative Conditions							
A1	What the licence authorises and regulates							
A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Scheduled Activity</th> <th style="text-align: left;">Fee Based Activity</th> <th style="text-align: left;">Scale</th> </tr> </thead> <tbody> <tr> <td>Composting</td> <td>Composting</td> <td>> 50000 T annual capacity to receive organics</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Composting	Composting	> 50000 T annual capacity to receive organics	<p>The only activity performed onsite is composting.</p> <p>Compliance: Yes</p>
Scheduled Activity	Fee Based Activity	Scale						
Composting	Composting	> 50000 T annual capacity to receive organics						
A2	Premises or plant to which this licence applies							
A2.1	The licence applies to the following premises:	Compliance: Yes						

	<table border="1"> <tr> <td>Premises Details</td> </tr> <tr> <td>"RAVENSWORTH"</td> </tr> <tr> <td>74 LEMINGTON ROAD</td> </tr> <tr> <td>RAVENSWORTH</td> </tr> <tr> <td>NSW 2330</td> </tr> <tr> <td>PART LOT 10 DP 1204457</td> </tr> <tr> <td>PART LOT 10 DP 1204457 AS HIGHLIGHTED IN YELLOW ON TONY MEXON & ASSOCIATES REGISTERED SURVEYORS MAP FOR BETTERGROW PTY LTD TITLED "CONCEPT PLAN SHOWING PROPOSED LEASE OF PART OF LOT 3 DP1193186 BEING MACQUARIE GENERATION'S RAVENSWORTH VOID 3. SHEET 2" SURVEYORS REF 14-32, REVISION DATE 6/2/2017. NOTE: ACCESS ROADS ARE EXCLUDED.</td> </tr> </table>	Premises Details	"RAVENSWORTH"	74 LEMINGTON ROAD	RAVENSWORTH	NSW 2330	PART LOT 10 DP 1204457	PART LOT 10 DP 1204457 AS HIGHLIGHTED IN YELLOW ON TONY MEXON & ASSOCIATES REGISTERED SURVEYORS MAP FOR BETTERGROW PTY LTD TITLED "CONCEPT PLAN SHOWING PROPOSED LEASE OF PART OF LOT 3 DP1193186 BEING MACQUARIE GENERATION'S RAVENSWORTH VOID 3. SHEET 2" SURVEYORS REF 14-32, REVISION DATE 6/2/2017. NOTE: ACCESS ROADS ARE EXCLUDED.	
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A3	Information supplied to the EPA								
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	<p>The activity continues to be carried out as proposed in the original submission.</p> <p>Compliance: Yes</p>							
2	Discharges to Air and Water and Applications to Land								
P1	Location of monitoring/discharge points and areas								

<p>P1.1</p>	<p>The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.</p> <p style="text-align: center;"><i>Water and land</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">EPA Identification no.</th> <th style="text-align: left;">Type of Monitoring Point</th> <th style="text-align: left;">Type of Discharge Point</th> <th style="text-align: left;">Location Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Leachate dam characterisation</td> <td></td> <td>South of site</td> </tr> <tr> <td>2</td> <td>Leachate dam emergency spillway</td> <td>Leachate dam emergency spillway</td> <td>Northeast corner of leachate dam</td> </tr> <tr> <td>3</td> <td>Process water tank</td> <td></td> <td>Eastern edge of premises</td> </tr> <tr> <td>4</td> <td>Sediment Basin</td> <td>Sediment Basin</td> <td>Sediment Basin outlet - TBC</td> </tr> </tbody> </table>	EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Leachate dam characterisation		South of site	2	Leachate dam emergency spillway	Leachate dam emergency spillway	Northeast corner of leachate dam	3	Process water tank		Eastern edge of premises	4	Sediment Basin	Sediment Basin	Sediment Basin outlet - TBC	<p>Location points for sampling accord with locations portrayed within the condition.</p> <p>Compliance: Yes</p>
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																			
1	Leachate dam characterisation		South of site																			
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4	Sediment Basin	Sediment Basin	Sediment Basin outlet - TBC																			
<p>3</p>	<p>Limit Conditions</p>																					
<p>L1</p>	<p>Pollution of waters</p>																					
<p>L1.1</p>	<p>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.</p>	<p>There has been no releases of contaminated water from the activity.</p> <p>Compliance: Yes</p>																				
<p>L2</p>	<p>Concentration limits</p>																					
<p>L2.1</p>	<p>For each monitoring/discharge point or utilisation area specified in the table below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.</p>	<p>Exceedances have not occurred.</p> <p>Compliance: Yes</p>																				
<p>L2.2</p>	<p>Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.</p>	<p>There has been no discharges from the leachate detention basin.</p>																				

<p>L2.3</p>	<p>To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\.</p>	<p>Compliance: Yes</p> <p>No pollution has occurred as there has been no discharges from the leachate detention basin.</p> <p>Compliance: Yes</p>																																										
<p>L2.4</p>	<p>Water and/or Land Concentration Limits</p> <p>POINT 2</p> <table border="1" data-bbox="414 662 1370 954"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>50 percentile concentration limit</th> <th>90 percentile concentration limit</th> <th>within range of</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>Ammonia</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>0.9</td> </tr> <tr> <td>pH</td> <td>pH</td> <td></td> <td></td> <td>6.5 - 8.5</td> <td></td> </tr> <tr> <td>Total suspended solids</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>50</td> </tr> </tbody> </table> <p>POINT 4</p> <table border="1" data-bbox="414 1029 1370 1257"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>50 percentile concentration limit</th> <th>90 percentile concentration limit</th> <th>within range of</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>pH</td> <td></td> <td></td> <td>6.5 - 8.5</td> <td></td> </tr> <tr> <td>Total suspended solids</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>50</td> </tr> </tbody> </table>	Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	within range of	100 percentile concentration limit	Ammonia	milligrams per litre				0.9	pH	pH			6.5 - 8.5		Total suspended solids	milligrams per litre				50	Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	within range of	100 percentile concentration limit	pH	pH			6.5 - 8.5		Total suspended solids	milligrams per litre				50	
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L3	Waste																										
L3.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below. Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below. This condition does not limit any other conditions in this licence.</p> <table border="1" data-bbox="360 810 1458 1177"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> <th>Other Limits</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td>General or Specific exempted waste</td> <td>Paper Crumble</td> <td>Composting</td> <td></td> </tr> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td>Urban wood residues (as defined in 'The compost order 2016')</td> <td>Composting</td> <td></td> </tr> <tr> <td>NA</td> <td>Liquid Waste</td> <td>Wastewater from Bayswater mine void 4</td> <td>Composting</td> <td></td> </tr> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td>Natural organic fibrous material (as defined in</td> <td>Composting</td> <td></td> </tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	NA	General or Specific exempted waste	Paper Crumble	Composting		NA	General solid waste (non-putrescible)	Urban wood residues (as defined in 'The compost order 2016')	Composting		NA	Liquid Waste	Wastewater from Bayswater mine void 4	Composting		NA	General solid waste (non-putrescible)	Natural organic fibrous material (as defined in	Composting		<p>Waste that is not authorised to be received at the site has not occurred.</p> <p>Compliance: Yes</p>
Code	Waste	Description	Activity	Other Limits																							
NA	General or Specific exempted waste	Paper Crumble	Composting																								
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		Schedule 1 of the POEO Act)			
NA	Power Station Bottom Ash	Coal ash which meets the conditions of 'The coal ash order 2014' .	Composting		
NA	General solid waste (non-putrescible)	Biosolids (as defined in Schedule 1 of the POEO Act)	Composting		
NA	General solid waste (non-putrescible)	Garden Waste (as defined in Schedule 1 of the POEO Act)	Composting	NA	
L3.2	The total amount of waste referred to in the table above, must not exceed 76,000 tonnes received from offsite per year				<p>The amount of waste received has not exceeded the annual limit.</p> <p>It was confirmed in an email from Bettergrow to Zambelli Environmental on 18/07/2019 waste received from offsite between 22/06/2019 to 21/06/2019 was under the required limit and that only biosolids, garden organics/greenwaste and water from void 4 was received for composting.</p> <p>Compliance: Yes</p>

L4	Hours of operation	
L4.1	Activities at the premises may only be carried out between 6am to 6pm Monday to Saturday.	Bettergrow confirmed that no out of hours operation has occurred since the commencement of the activity. Compliance: Yes
L5	Potentially offensive odour	
L5.1	No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997. Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defense if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	No offensive odour has been released from the facility since commencement of the activity. In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that: <ul style="list-style-type: none"> • there were no odour complaints since commencement of the activities. Compliance: Yes
4	Operating Conditions	
O1	Activities must be carried out in a competent manner	
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Activities are continuing to be carried out in a competent manner. Confirmation with the site manager indicates the various aspects are being appropriately managed with no record of an incident occurring.

		<p>It is the opinion of Zambelli Environmental that the activity continues to be carried out in a competent manner. The audit did not highlight any inappropriate practices.</p> <p>Compliance: Yes</p>
O.1.2	No alteration or modification in approved design or method of operation must be made without written approval from the EPA.	<p>No alteration or modification has occurred without necessary approvals being obtained.</p> <p>Compliance: Yes</p>
O2	Maintenance of plant and equipment	
O.2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	<p>Bettergrow confirmed that plant and equipment are maintained and serviced regularly. Bettergrow provided a maintenance register via drop box for review. Information recorded indicates that specific plant and equipment are being serviced regularly.</p> <p>Compliance: Yes</p>

O3	Dust	
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	<p>In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that:</p> <ul style="list-style-type: none"> • Bettergrow track the amount of water delivered to windrows. • regular spraying of water occurs to suppress dust. • volumes used for dust suppression have been recorded. • trucks entering or leaving the site that are carrying loads are covered. <p>There has been no dust complaint lodged with Bettergrow.</p> <p>Compliance: Yes</p>
O3.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times except during loading and unloading.	<p>In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that:</p> <ul style="list-style-type: none"> • trucks entering or leaving the site that are carrying loads are covered. <p>There has been no dust complaint lodged with Bettergrow.</p>

		Compliance: Yes
O3.3	Leachate is not to be used for dust suppression on haul roads.	<p>It was confirmed by Bettergrow that leachate is not used for dust suppression on haulage roads.</p> <p>Leachate has been used to increase moisture percentage of windrows only.</p> <p>COMPLIANCE: YES</p>
O3.4	The licensee must ensure that no material, including sediment or oil, is tracked from the premises.	<p>Bettergrow provided a record via drop box of an incident where a rock was flicked up and a hydraulic hose line ruptured resulting in the tracking of oil along the compost hardstand pad. The record shows that the contaminated soil was removed and placed into a bunded area until removal from the site occurred. Contaminated soil was removed to a licensed waste management facility.</p> <p>COMPLIANCE: YES</p>
O4	Emergency response	

<p>O4.1</p>	<p>The licensee must maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. The PIRMP must be developed in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations (POEO) Act 1997 and POEO regulations. The licensee must keep the incident response plan on the premises at all times. The incident response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. The PIRMP must be tested at least annually or following a pollution incident.</p> <p>Note: The licensee must develop their PIRMP in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2009.</p>	<p>A review of drop box indicated that Version 4 of the PIRMP is in place. Records indicate the PIRMP was first tested on 16.01.19 and was activated on 15/05/19 in relation to an identified hazard (culvert on haulage road) which resulted in incident report and corrective actions being recorded.</p> <p>Compliance: Yes</p>
<p>O5</p>	<p>Process and management</p>	
<p>O5.1</p>	<p>Clean stormwater must be diverted around waste and leachate catchments at the premises.</p>	<p>Observation of current photos provided for the audit indicate clean water continues to be diverted away from the compost hardstand area and leachate detention basin.</p> <p>Compliance: Yes</p>
<p>O5.2</p>	<p>There must be no burning or incineration of waste at the premises.</p>	<p>Bettergrow confirmed that no waste is burnt at the premises.</p> <p>Compliance: Yes</p>

O6	Waste management	
O6.1	Waste is only permitted to be received, stored and processed in areas at the premises where leachate barrier has been installed and the barrier is to EPA satisfaction.	In an email from Bettergrow to Zambelli Environmental on 16/07/2019 it was demonstrated that the hardstand pads did achieve appropriate density and permeability. Review of report titled Ravensworth Leachate Barrier Certification prepared by RCA Australia occurred. Compliance: Yes
	Leachate Management	
O6.2	Leachate collection and storage facilities must be maintained so as to collect and impound all leachate generated by a storm events of less than 1 in 25 year recurrence interval of one day duration.	Compliance: Yes
O6.3	Leachate must not be permitted to mix with stormwater or any stormwater infrastructure at the premises.	Compliance: Yes
O6.4	The licensee must not cause or permit any leachate to pool at the premises (except within designated leachate dams/sumps).	No ponding or pooling of leachate is evident. Compliance: Yes
O6.5	Leachate may be irrigated over active compost windrows only, within the premises.	Bettergrow site manager confirmed that Leachate has only been applied to compost windrows. Compliance: Yes
O6.6	No leachate is permitted to be discharged from the operating area of the premises.	Compliance: Yes

O6.7	The Licensee shall install a level marker in the leachate dam/s to indicate the volume of leachate in each dam.	Compliance: Yes
O7	Other operating conditions	
O7.1	<p>The licensee must prepare and implement an Odour Management Plan (OMP) for the premises before any waste is accepted in Stage 1 at the premises. For all odour emissions at the premises the OMP must include but is not limited to:</p> <ol style="list-style-type: none"> 1. Key performance indicators; 2. Monitoring method(s); 3. Location, frequency and duration of monitoring; 4. Record keeping; 5. Response mechanisms; 6. Compliance reporting; and 7. Complaints management and reporting. 	<p>Bettergrow provided via drop box Odour management risk assessment (SH&EWMS : # 5).</p> <p>Appropriate control measures are in place for the management of odour from identified aspects associated with the activity.</p> <p>Appropriate recording forms are in use for the monitoring of odour.</p> <p>Review of the complaints register indicates that there has been no complaints related to pollution since the commencement of the activity.</p> <p>Compliance: Yes</p>
O7.2	Spray from leachate irrigation must not drift beyond active compost rows.	Confirmation with site manager indicates that spray drift from leachate application is minor and does not extend past compost pad.

		Application does not occur when wind speeds are high. Compliance: Yes
5	Monitoring and Recording Conditions	
M1	Monitoring records	
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Bettergrow demonstrated via drop that results of monitoring are being recorded. Compliance: Yes
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Review of records indicates they are legible. The activity has not operated for 4 years. Records can be produced to the EPA upon request in a form that is legible. Compliance: Yes
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected;	All monitoring required is being performed. Required water monitoring locations are being monitored albeit on some occasions

	<p>c) the point at which the sample was taken; and d) the name of the person who collected the sample.</p>	<p>the leachate detention basin has been dry.</p> <p>Review of historical data indicates Pt 3 water tank water quality, which receives water from void 4 is consistent. Leachate detention basin water contains less salt than void 4 water. Nutrients are low within the leachate detention basin water.</p> <p>Sample events are tracked in sample register.</p> <p>Compliance: Yes</p>
<p>M2</p>	<p>Requirement to monitor concentration of pollutants discharged</p>	
<p>M2.1</p>	<p>For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:</p>	<p>Compliance: Yes</p>

M2.2	Water and/or Land Monitoring Requirements				Records indicate that required parameters are being analysed for. Compliance: Yes
	POINT 1				
	Pollutant	Units of measure	Frequency	Sampling Method	
	Alkalinity (as calcium carbonate)	milligrams per litre	Quarterly	Grab sample	
	Ammonia	milligrams per litre	Quarterly	Grab sample	
	Calcium	milligrams per litre	Quarterly	Grab sample	
	Chloride	milligrams per litre	Quarterly	Grab sample	
	Electrical conductivity	microsiemens per centimetre	Quarterly	Grab sample	
	Fluoride	milligrams per litre	Quarterly	Grab sample	
	Iron	milligrams per litre	Quarterly	Grab sample	
	Magnesium	milligrams per litre	Quarterly	Grab sample	
	Manganese	milligrams per litre	Quarterly	Grab sample	
	Nitrogen (total)	milligrams per litre	Quarterly	Grab sample	
	pH	pH	Quarterly	Grab sample	
	Phosphorus	milligrams per litre	Quarterly	Grab sample	
	Polycyclic aromatic hydrocarbons	milligrams per litre	Quarterly	Grab sample	
	Potassium	milligrams per litre	Quarterly	Grab sample	
	Sodium	milligrams per litre	Quarterly	Grab sample	
	Sulfate	milligrams per litre	Quarterly	Grab sample	
	Total organic carbon	milligrams per litre	Quarterly	Grab sample	
	Total petroleum hydrocarbons	milligrams per litre	Quarterly	Grab sample	
Total Phenolics	milligrams per litre	Quarterly	Grab sample		
Total suspended solids	milligrams per litre	Quarterly	Grab sample		

POINT 2			
Pollutant	Units of measure	Frequency	Sampling Method
Alkalinity (as calcium carbonate)	milligrams per litre	Daily during any discharge	Grab sample
Ammonia	milligrams per litre	Daily during any discharge	Grab sample
Calcium	milligrams per litre	Daily during any discharge	Grab sample
Chloride	milligrams per litre	Daily during any discharge	Grab sample
Electrical conductivity	microsiemens per centimetre	Daily during any discharge	Grab sample
Fluoride	milligrams per litre	Daily during any discharge	Grab sample
Iron	milligrams per litre	Daily during any discharge	Grab sample
Magnesium	milligrams per litre	Daily during any discharge	Grab sample
Manganese	milligrams per litre	Daily during any discharge	Grab sample
Nitrogen (total)	milligrams per litre	Daily during any discharge	Grab sample
pH	pH	Daily during any discharge	Grab sample
Phosphorus	milligrams per litre	Daily during any discharge	Grab sample
Polycyclic aromatic hydrocarbons	milligrams per litre	Daily during any discharge	Grab sample
Potassium	milligrams per litre	Daily during any discharge	Grab sample
Sodium	milligrams per litre	Daily during any discharge	Grab sample
Sulfate	milligrams per litre	Daily during any discharge	Grab sample
Total organic carbon	milligrams per litre	Daily during any discharge	Grab sample
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Total Phenolics	milligrams per litre	Daily during any discharge	Grab sample
Total suspended solids	milligrams per litre	Daily during any discharge	Grab sample

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Silver	milligrams per litre	Quarterly	Grab sample																																										
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M3	Testing methods – concentration limits																																												

M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	There has been no discharge of pollutants from the site. Compliance: Not activated
M4	Recording of pollution complaints	
M4.2	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Bettergrow provided via drop box a copy of its complaints register. No complaints have been received. Two odour observations have been entered into the register since the commencement of the activity. Compliance: Yes
M4.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Review of register provided by Bettergrow indicates that appropriate fields are provided that captures required information. Compliance: Yes
M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Noted. The activity has not operated for four years, but there is no reason

		based on observation of register that this cannot be achieved. Compliance : not activated
M4.4	The record must be produced to any authorised officer of the EPA who asks to see them.	
M5	Telephone complaints line	
M5.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	In an email from Bettergrow to Zambelli Environmental, it was confirmed that a complaints telephone line does exist. Section 4.17 provides further detail. Compliance: Yes
M5.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Section 4.17 provides further detail. Compliance: Yes
M5.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	
M6	Other monitoring and recording conditions	
M6.1	The licensee must record the following information for each load of waste(s) received at the premises: (a) the registration number of the vehicle; (b) the time and date of receipt of the waste; (c) the source of the waste; (d) the type(s) of waste; and (e) the quantity of each type of waste (in tonnes).	Compliance: Yes

6	Reporting Conditions	
R1	Annual return documents	
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	<p>In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that:</p> <ul style="list-style-type: none"> • annual returns were submitted within 60 days after the end of each reporting period. • Review of annual returns submitted by Bettergrow and contained within drop box indicates that annual returns are being filled out correctly. <p>Compliance: Yes</p>
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Compliance: Yes
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <ol style="list-style-type: none"> a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. 	Compliance : not Activated

<p>R1.4</p>	<p>Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.</p>	<p>Compliance: not Activated</p>
<p>R1.5</p>	<p>The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').</p>	<p>In an email from Bettergrow to Zambelli Environmental on 17 July 2019 it was confirmed that:</p> <ul style="list-style-type: none"> • annual returns were submitted within 60 days after the end of each reporting period. <p>Compliance: yes</p>
<p>R1.6</p>	<p>The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.</p>	<p>Annual returns supplied to EPA are being retained.</p> <p>Compliance: yes</p>
<p>R1.7</p>	<p>Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.</p> <p>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p>	<p>Annual returns are being submitted with sign off from Neil Schembri Director.</p> <p>Compliance: yes</p>

	Note: An application to transfer a licence must be made in the approved form for this purpose.	
R2	Notification of environmental harm	No environmental harm has been caused. Compliance : not activated
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Noted. Notification has not been required. Compliance : not activated
R.2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Compliance : not activated
R3	Written report	
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Compliance : not activated

R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Compliance : not activated
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Compliance : not activated
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Compliance: not activated
R4	Other reporting conditions	
R4.1	The licensee must maintain a daily log and record the following data of fires at the site: a) Time and date when the fire was observed, started or reported. b) Whether the fire was authorised by the licensee, and, if not, the circumstances which ignited the fire. c) The time and date that the fire ceased and whether it burnt out or was extinguished. d) The location of fire (eg. clean timber stockpile, putrescible garbage cell, etc). e) Prevailing weather conditions. f) Observations made in regard to smoke direction and dispersion. g) The amount of waste that was combusted by the fire.	In an email sent from Bettergrow to Zambelli Environmental on 29.7.19 - 3 reports were provided that indicated SPONCOM in a windrow, a possible lightning strike and ground heating related to insitu coal stone. SPONCOM did not result in an outbreak of fire. Appropriate

	h) Action taken to extinguish the fire.	methods were adopted to suppress SPONCOM. Reports also include observation regarding coal stone SPONCOM. Appropriate information was recorded that described the relevant events. Compliance: Yes
R4.2	The licensee or its employees or agents must notify the EPA in accordance with conditions R2.1 and R2.2 of all fires at the premises as soon as practical after becoming aware of the incident.	
R4.3	The licensee must complete and submit to the EPA an Annual Waste Summary Report each financial year.	Observation shows this is occurring via records provided by Bettergrow via drop box. Compliance: yes
R4.4	The Annual Waste Summary Report must be submitted to the EPA via the Waste and Resource Reporting Portal (WARRP) within 60 days of the end of the financial year.	Confirmation from Bettergrow indicates that submissions are made before the due date. Compliance: yes
7	General Conditions	
G1	Copy of licence kept at the premises or plant	
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Confirmation from Bettergrow indicates that a copy of the license is at the premises. Compliance: yes

G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Noted.
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Compliance: yes
8	Special Conditions	
E1	Requirement to Provide a Financial Assurance	
E1.1	A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as “Authorised Deposit-taking Institutions” under the banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential regulatory Authority (APRA) must be provided to the EPA.	Compliance: yes
E1.2	The financial assurance must be favour of the Environment Protection Authority in the amount of one hundred thousand dollars (\$100,000.) and provided to the EPA by 5pm on 31 August 2017. The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by APRA.	Compliance: yes
E1.3	The financial assurance must be in favour of the Environment Protection Authority in the amount of two hundred dollars (\$200,000) and provided to the EPA by 5pm on 31 August 2018. The financial assurance is required to secure or guarantee funding for works or programmes required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by APRA.	In an email sent from Bettergrow to Zambelli Environmental on 30.7.19, the bank guarantee was provided which is current. Compliance: Yes
E1.4	The financial assurance must be in favour of the Environment Protection Authority in the amount of three hundred thousand dollars (\$300,000) and provided to the EPA by 5pm on 31 August 2019. The financial assurance is required to secure or guarantee funding for works or programmes required by or	Compliance : not activated

	under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by APRA.	
E1.5	The financial assurance must be maintained during the operation of the facility and thereafter until such time as the EPA is satisfied the premises is environmentally secure.	Compliance: yes
E1.6	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	Noted : Compliance : not activated
E1.7	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	Noted.
E1.8	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder.	Noted. Compliance : not activated
E2	Environment obligations of licensee	
E2.1	While the licensee’s premises are being used for the purpose to which the licence relates, the licensee must: a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee’s employees or agents. b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA. c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.	Records show that a hydraulic oil spill on the compost hardstand was clean up effectively. Compliance : yes
E2.2	In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee must: a) Make all efforts to contain all fire water on the premises; b) Make all efforts to control air pollution from the premises;	Compliance: not activated

	<p>c) Make all efforts to contain any discharge, spill or run-off from the premises; d) Make all efforts to prevent flood water entering the premises; e) Remediate and rehabilitate any exposed areas of soil and/or waste; f) Lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of; g) At the request of the EPA, monitor groundwater beneath the premises and its potential to migrate from the premises; h) At the request of the EPA, monitor surface water leaving the premises; and i) Ensure the premises is secure.</p>	
<p>E2.3</p>	<p>After the licensee’s premises cease to be used for the purposes to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must: a) Remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee’s premises; and b) Rehabilitate the premises, including conducting an assessment of the site and if required remediation of any site contamination.</p>	<p>Compliance: not activated</p>

End of conditions