

Development Consent, Project and Concept Approval Compliance Status - November 2022

Reference	Approval or licence requirement	Evidence collected 2022	Audit Finding	Compliance status	Action Reference	Visy Comment
Development Consent (DA 6/98 MOD 4)						
Annual Reporting						
9	Is an annual report detailing the use of Non-Standard Fuels & with the required details to the DG?	Annual Environmental Compliance and Monitoring Report (ECMR) 2022 Interview M O'Donovan	Non-Standard Fuels not used on site. The definition of fuels is now subject to new guidelines from NSW EPA "Eligible waste fuel guidelines" Dec 2016. This will require updates to both the EPL and the Consent. Negotiations are currently underway with NSW EPA (pers Com Matt O). The EPL will need to be modified prior to the modification of the consent. ECMR provides fuel feed quantities utilised during the reporting period.	Compliant	N/A	
OEMP						
11	OEMP shall address: a) identification of the statutory obligations b) role, responsibility, authority, accountability & reporting c) management measures/mitigation measures d) environmental management procedures e) monitoring, inspection & test plans f) audit requirements g) delegation of responsibility for breaches & receipt of PINs issues by EPA h) community consultation & nonfriction strategy	OEMP Rev 4, 30 August 2021	OEMP is current and up to date. Sighted statutory obligations Section 4. Roles and responsibilities documented Section 6. Visy People Connect lists organisational chart with current staff names. Management measures under the OEMP occur in various sections. Some mitigation measures are in the OEMP but most are included in the subplans. Monitoring and inspection is dealt with generically in section 16 and specific details are provided in the relevant subplans. Auditing addressed in Section 20. Community consultation is dealt with in Section 8. Map in Section 1 indicates overall site area.	Compliant	Recommend referencing the DPE Independent Audit Guidelines in Section 20 in next OEMP update.	
12	OEMP required to be reviewed annually by the preparation of an environmental report which analyses the results of monitoring required. The report shall review the performance of the plant against the relevant EMP's, the Conditions of Consent & other licences and approvals relating to operation of plant.	OEMP Rev 4, 30 August 2021 ECMR 2022	OEMP was reviewed in August 2021. The Annual Environmental Compliance and Monitoring Report 2022 addresses the requirements of the Consent management plans and the EPL.	Compliant	N/A	
12	Annual report shall include: a) review of effectiveness of environmental management of plant b) results of monitoring including interpretation by suitably qualified person c) discussion of actual performance d) listing of any variations obtained to approvals e) record of heavy vehicle movements f) set out environmental management targets for the next year	ECMR 2022	The ECMR 2022 investigates the performance of the Mill against the targets, Consent and EPL as required. Sufficient detail is provided to support the discussion. Non conformances particularly in response to odour are investigated, described and discussed. Specialist reports or summaries there of are presented in the Appendices, eg. Farm Environmental Monitoring, Odour and Emission Testing (Ektimo, Nov 2021).	Compliant	N/A	
Hazard Management						

15	Has a report for incidents associated with operation &/or transport of the proposed development and with an actual or potential significant off-site impacts on people or environment been prepared and submitted to the Department within 24hrs?	ECMR 2022	No incidents with a significant impact off site have occurred during the reporting period. 5 minor spills, contained to the mill site, occurred and were recorded within internal Visy systems.	Not triggered	N/A	
16	Has a further detailed report be prepared and submitted following investigations?	ECMR 2022	No incidents with a significant impact off site have occurred during the reporting period.	Not triggered	N/A	
18	Are hazard audits being completed every 3 years and carried out in accordance with the Department's Hazard Industry Planning Advisory Paper No.5, <i>Hazard Audit Guidelines</i> ?	Hazard Audit Dec 2021, Pinnacle Risk Management.	Hazard audit carried out within required timeframe (Nov 2021) and reported during the period (2021 - 2022). Audit prepared in accordance with the Department's Hazard Industry Planning Advisory Paper No.5, <i>Hazard Audit Guidelines</i>	Compliant	N/A	
18	Do all hazardous goods road tankers unloading areas have bunding to the size of the total quantity of the largest road tanker?	Previous audit report (NGH, 2021) Site observations	The 2021 review indicates that there is sufficient bunding. Recommendations made regarding storage of materials and maintenance of bund integrity. No material change in volume of bunding or tank dimensions for delivery of chemicals during the reporting period.	Compliant	N/A	
19	Do all dangerous goods vehicles delivering bulk dangerous goods to site include brake interlocks?	Previous audit report (NGH, 2021) Interview M O'Donovan	Staff supervise unloading of tankers, valves not operable until trailer brakes engaged. Safety procedure documents unloading and brake interlock. Visy Protocols/contracts specifies the requirement for brake interlocks, no changes to procedure during the reporting period.	Compliant	N/A	
Noise Management						
20a)	Are all non-applicant residences that are likely to be affected by operation noise levels more than 50dB(A) LA10 above background noise levels to the satisfaction of the EPA?	ECMR 2022 EMM Annual Attended Noise Monitoring Results - February 2022	Monitoring in February 2022 found noise levels at most assessment locations satisfied the assessment criteria. Wind speeds greater than 3m/s affected 13 out of 24 readings. Most homes acoustically insulated via landowner agreements. Mod 4 approved by DPIE Aug 2020, allows higher noise levels for homes with agreements in place. The consent also required winter time noise monitoring. Eight properties have agreements in place.	Compliant	N/A	
20b)	Have these residences been acoustically treated for longer the 6 months if requested by the owner to the satisfaction of the EPA?	ECMR 2022	Residences at Glenrarry, Reka, Whispering Pine, Pleasant View, Brentwood, Nolte, Deep Creek and Poverty Lane are identified in the ECMR 2022 as having signed agreements.	Compliant	N/A	
23	Noise emissions from the operation of the mill shall: a) not exceed an LA10(15min) noise limit of 40dB(A) during the day (07:00-22:00) at the nearest residential receiver b) not exceed the LA10(15min) noise emission of 38dB(A) during the night (22:00-07:00) at the nearest residential receiver	ECMR 2022 EMM Annual Attended Noise Monitoring Results - February 2022	ECMR noise results (Feb 2022) indicates that noise emissions from the mill did not exceed the assessment criteria due to weather contributions and negotiated agreements however estimated site contribution values exceeded limits. Noise limits for 13 measurements during the monitoring period were not applicable due to the presence of winds greater than 3 m/s at the time. All other locations with exceedances have noise agreements negotiated with Visy.	Compliant	N/A	
	Has monitoring indicated that increased levels of noise emissions due to temperature inversions?	ECMR 2022 EMM Annual Attended Noise Monitoring Results - February 2022	Noise limits for 13 measurements during the monitoring period were not applicable due to the presence of winds greater than 3 m/s.	Compliant	N/A	

24	If so, has this been documented, ameliorative measures put in place?	Previous audit report (NGH, 2021) Interview M O'Donovan	Elements of the Noise Mitigation Action Plan are being implemented progressively. Seven of eight properties assessed for treatment and mitigation measures are in place with eight properties.	Compliant	N/A
25	Does the ONMP include: a) information on mitigation measures b) complaints handling, noise monitoring, reporting of complaints & response actions c) measures for dealing with low freq noise & extreme noise incidences?	Noise Management Plan, July 2021	The Noise Management Plan 2021 addresses: a) In Section 6 b) In Section 8 c) In Section 6 - incidence recorded & the cause determined. Mitigation put in place and response given to complainant. It is noted that an update to the Noise Management Plan was made in July 2021 which addresses previous recommendation for inclusion of NSW EPA Noise Policy for Industry 2017.	Compliant	
Air Quality					
26	Is the 'Best Available Technology' (BAT) for this type of pulp and paper mill being applied to achieve, at a minimum, compliance with the provision of the USEPA's NESHAP limits?	Air Quality Management Plan May 2021 Continuous Event Monitoring Systems (CEMS) exceedance summary 2021 - 2022 Stack sensor calibration records 2021 and 2022 Visy Pulp and Paper Emission Testing Reports (Ektimo Nov 2021, March 2022)	Visy employs CEMS for stack emissions at multiple locations on the plant. CEMS sensors are calibrated twice per year. Additional emissions monitoring also occurs twice per year. Odour complaints are tracked and responded to and compared to CEMS data. Plant systems and processes are constantly monitored, updated and improved. Advanced controllers to monitor a range of factors are minimising trips of the electrostatic precipitators potentially reducing stack opacity emissions. The plan includes a range of procedures for monitoring and reporting on emissions. Exceedances in emissions and responses to exceedances are tracked and reported. Management of complaints including odour are tracked and reported. Advanced controllers to monitor a range of factors are minimising trips of the electrostatic precipitators potentially reducing stack opacity emissions.	Compliant	N/A
27	AQMP shall include - safeguards and procedures for dealing with all emission discharges, dust control and monitoring of odour	Air Quality Management Plan May 2021 ECMR 2021 - 2022 Section 3.2	The plan includes a range of procedures for monitoring and reporting on emissions. Exceedances in emissions and responses to exceedances are tracked and reported. Management of complaints including odour are tracked and reported. Advanced controllers to monitor a range of factors are minimising trips of the electrostatic precipitators potentially reducing stack opacity emissions.	Compliant	N/A
29	Are all access roads and tracks constructed, designed and maintained in consultation with DLWC, and in accordance with the "Guidelines for the planning, construction and maintenance of tracks", Soil Con (1994)?	Site observations Interview M O'Donovan	No new access roads or tracks have been created in this reporting period. The main access roads are sealed.	Compliant	N/A
30	Are forestry operations being carried out in accordance with the 'Forest code of practice for plantations on private lands in the SW slopes of NSW'?	Site observations and reference to aerial images	No forestry has taken place on the subject land since the last audit.	Not triggered	N/A

32	Have any earthwork structures for the storage of wastewater been undertaken? If so is it to the satisfaction of the DWLC?	Observations from the site inspection conducted as part of the audit. Mod 5 GHID Report Oct 2021, Appendix A (Xeros Picolo Engineers - Dam Plans)	Design for a 3ML waste water pond constructed in 2016 retrospectively completed November 2021 and approved February 2022, certified by McKenzies, sighted during audit and as part of modification application. Dam filled in during Feb 2022, new dam has been built and was sighted during audit. Certification and construction completed outside of reporting period, will be recorded during 2022 - 2023 reporting period.	Compliant	
Wastewater Management					
33	Are discharges of treated wastewater from the mill into Sandy Creek or any of its tributaries: a) have a average frequency of 1 in 10 or less b) permitted as per the EPL c) recorded - amount, duration & flow conditions	Winter Storage Dam records 2017 - 2022 cited.	Winter storage dam was not more than 60% 2017, 40% 2018, 40% 2019, 80% 2020, 61% 2021 and 89% 2022. Storage dam reached approximately 110% capacity during reporting period however was not discharged. Storage dam typically discharged when capacity nears 110%.	Not triggered	N/A
34	WWMP shall include: a) crop management b) irrigation scheduling c) nutrient budgets d) salinity management measures e) site drainage control measures f) comprehensive soil details of areas proposed for irrigation g) measures to ensure maximisation of water recycling/reuse	Updated Water Management Plan MPL- TUM-ENV-007-3 June 2021	WWMP requirements are addressed in the WWMP: a) sections 4.4, 6.3, 7.4 b) sections 4.4.4, 4.4.5, 4.4.5.8, 4.4.5.9, 6.3 c) sections 4.3.1, 4.3.2, 4.3.4, 4.4.1, 4.4.4, 4.4.5.2, 4.4.5.8, 6.3.2, Appendix 2 d) sections 4.4.1, 4.4.5.3, 4.4.5.9, 4.5.3 e) sections 4.1, 4.4.5 f) section 4.1.4, 4.2.4, 4.4.1, 4.3.4, 7.3.1.2 g) sections 4.2.4 WWMP updated during reporting period.	Compliant	
35	Has monitoring indicated a water table rise in either the shallow or deep piezometer that exceeds an average 10cm per year over a 5 year period, &/or that the water table under the effluent irrigation area has risen within 2m of the land surface?	ECMR Appendix 8 - Groundwater Trend Cycle Farm and Environmental Monitoring Report 2022	Groundwater levels have remained either stable or have shown an increase, likely due to higher than average rainfall levels during 2021/2022. Levels have risen closer to 2016 levels during the reporting period after falling during drier years 2017 - 2019 due to above average rainfall and are now more reflective of pre-drought levels despite larger rise.	Compliant	N/A
36	Has a program to monitor groundwater salinity levels been prepared? Has there been any significant increases in salinity levels found attributable to the irrigation scheme? If so what methods have been implemented to avoid adverse impacts?	ECMR 2022 Farm and Environmental Monitoring Report 2022	The reporting does not indicate an increase in soil salinity in the irrigation area or groundwater salinity as measured at the piezometers across the site as a consequence of irrigation.	Compliant	N/A
37	Are those lands identified in the EIS for irrigation of effluent available for irrigation?	Site observations during audit Aerial Imagery	Land identified in the EIS for irrigation is being used for irrigation with the exception of 20ha to the east of the centre pivots. This land is available but there is insufficient effluent to warrant its use.	Compliant	N/A
Surface Water & Storage					
38	SWMP shall include: a) areas potentially subject to contaminated stormwater runoff b) measures to prevent pollution of waterways c) proposed bunding for storage areas d) total run-off detention for flood mitigation e) provision for treatment of fire water on site, to prevent direct discharge offsite	Water Management Plan MPL- TUM-ENV-007-3 June 2021	The audit indicated the SWMP addressed: a) Section 4.5 b) Section 4.1 d) Section 4.2 e) Section 4.2 Plan updated during reporting period.	Compliant	N/A

40	Has all uncontaminated surface runoff that has left site to the satisfaction of the DLWC?	Site observations during audit	No scouring of waterways was observed at the time of the audit. Waterways accepting overland flow were generally grassed and or tree lined. Sandy Creek does have some historic cut bank erosion.	Compliant	N/A
Solid Waste Management					
41	<p>WMP shall include:</p> <ul style="list-style-type: none"> a) details of solid wastes returning to the pulping process b) details of ongoing analysis & monitoring for solids being disposed by landfill c) details of investigations into beneficial reuse of purge fly ash & purge lime mud d) other measures to reduce amount of waste going to landfill 	<p>VP9-10-10-3-PN-009 Solid Waste Management Plan 2017</p> <p>Site observations during audit</p> <p>Resource Recovery and Waste Reuse Exemption 2022, (Captains Flat)</p>	<p>a) Section 4.2 of the WMP details the reuse of suitable solid waste in the pulping process as fuel and fibre sources.</p> <p>B) Section 3 of the WMP details the analysis and monitoring waste and identifies the waste disposed of to landfill.</p> <p>C) Section 4.2 of the WMP details the current investigations into the beneficial reuse of purge fly ash & purge lime mud under waste Resource Recovery Order and Exemption.</p> <p>d) Section 5 of the WMP details the landfill diversion strategy that Visy are pursuing.</p> <p>Exemption and order now available for Dregs and Grits and boiler (bottom) sand.</p> <p>Plan not yet updated, waiting for EPL variation. An EPL variation has been submitted to the EPA and is currently being considered. Will require update to accommodate material removal to Woodlawn mine rehab site. Plan will need to discuss onsite (north of waste handling area) and offsite management by external company. Refer s5.2 of 2017 WMP for initial considerations and initial application. Signed during audit.</p>	Not compliant	Update WMP to include specific detail around Woodlawn RRO and Captains Flat.
Access & Traffic Management					
45A	<p>Has the construction of the refuelling area and associated access road commenced? If so, have the plans:</p> <ul style="list-style-type: none"> a) been prepared on consultation with council b) include details of onsite traffic management signage c) prepared to accommodate 36m articulated vehicles? 	Site observations during audit	As per previous audit, no work has commenced the construction of the refuelling area and associated access road is not likely to proceed.	Not triggered	N/A
46	Is all access to site via the new intersection & access road?	Site observations during audit	The upgraded intersection and access road from the Snowy Mountains Highway is the site access.	Compliant	N/A
47	Has there been any night time (2200-0700) semi-trailer or B-double truck movements to and from the plant via Snow Mountains Highway through Adelong?	ECMR Appendix 6 Monthly HV Movement Data Complaints Register	Nil movements out of hours. A large proportion of paper movements are now on A-Double vehicles which can only use the Gocup Road.	Compliant	N/A
48	<p>Has MR280 north of Adelong been upgraded to give B-double access?</p> <p>Has this route been used by semi-trailers or B-doubles to and from the plant?</p>	ECMR Appendix 6 Monthly HV Movement Data	No truck movements on MR280 north of Adelong are recorded. No upgrade of MR280 north of Adelong has occurred.	Compliant	N/A
49	Is transport of waste restricted to SH4, Boonderoo Rd and MR280?	Waste removal records sighted	Waste travels on Gocup Road and the Snowy Mountains Highway to facilities north of Tumut. Boonderoo Waste Facility no longer exists and subsequently not utilised.	Compliant	Recommend removing condition
50	<p>Prior to construction of refuelling area, has a revised TMP been prepared that includes:</p> <ul style="list-style-type: none"> a) records of all heavy vehicles (>3tonne) entering or leaving site - times and access routes b) measures to reduce sleep disturbances in built up areas c) measures to reduce other impacts in built up areas - movement through town, parking, etc d) measures to ensure plan is implemented e) measures to ensure drivers are aware of any provisions & restrictions associated with the utilisation of the refuelling facility f) proposed onsite traffic signage 	Site observations during audit	No work has commenced on the construction of the refuelling area and associated access road is not likely to proceed.	Not triggered	N/A

52	Does Visy participate in any relevant committees established to investigate transport infrastructure initiatives?	SWG website: https://murrayregionforestryhub.com.au/softwoods-working-group/ FIC website: http://forestryindustryCouncil.com.au/members/	Visy is listed as a member of Softwoods Working Group (SWG) (now part of Murray Region Forestry Hub) & Forestry Industry Council (FIC) - focussed on improving the maintenance, standards & safety along the main haulage road.	Compliant	N/A
Landscape & Vegetation Management					
54	LMP shall be integrated with the NVMP and include: a) existing landforms & final landforms b) proposals for the irrigation areas & softwood plantations c) planting species, purpose, maintenance requirements, irrigation req & illustration of typical visual character d) location of all hard & soft landscaping features e) program for staged work & maintenance of all landscaping & rehab works	MPL-TUM-ENV-003-3, Landscape and Native Vegetation Management Plan, Oct. 2021	The LMP and NVMP are integrated and were reviewed and updated in Oct 21. Pre-existing and final landforms are described. Irrigation areas fully described in the Water Management Plan. Planting species and purpose are described in section 2 and app B. Maintenance in section 3 and App G+H. Illustrations are shown in App D+E+H. Existing and planted vegetations is described in Appendix A, C + F. Revegetation is described in app A + F.	Compliant	
55	NVMP shall include: a) retained native veg is appropriately fenced & signposted to exclude stock b) large HBTs shall be retained where possible c) native veg buffers are retained 50m to each side of Sandy Creek & 20m to each side of major drainage depressions d) indigenous plant species used for site reveg	ECMR 2022	Vegetation established continues to grow taking advantage of wetter winters between 2020 - 2022. No plantings in 2017-2022. Retained vegetation is fenced with appropriate signage. Large HBT have been retained and interspersed with plantings to promote connectivity. The creeks have been fenced on both sides and the buffer generally exceeds 50m, smaller drainage depressions have been fenced and revegetated with native trees and shrubs. No fire impact during 19/20 summer. No significant losses.	Compliant	
Monitoring					
57	A detailed monitoring program shall include: a) provisions for monitoring the implementation & effectiveness of MP's required by the consent b) sampling locations, frequencies & parameters to be tested c) characteristics of existing env - i.e. ambient air levels d) timing of monitoring reports Is a NATA accredited lab being used for monitoring analysis?	OEMP Rev 4, 30 August 2021 OEMP Rev 4, 30 August 2021 and associated subplans NATA certificates sighted online and in monitoring reports	Yes, the plan is incorporated in the OEMP. The OEMP details the need for monitoring and references the Environmental Performance, Measurement and Reporting (Procedure 205-0). The OEMP and subplans detail the location and methods for monitoring, evaluation criteria and reporting requirements. NATA certificates were sighted for flyash and dregs & grits analysis EKTIMO NATA certification cited at https://nata.com.au/accredited-organisation/melbourne-laboratory-14601-14659/?highlight=EKTIMO . McMahon NATA Certification Cited at https://nata.com.au/accredited-organisation/wagga-wagga-laboratory-3349-3342/?highlight=McMahon	Compliant	N/A
60	Have CEWS been installed to monitor the combined exhaust gases from the stack?	ECMR 2022 s3.2.1, ECMR 2022 Appendix 2 EPL Annual Return 2022	Continuous Emissions Monitoring (CEMS) been installed to monitor exhaust gases from the stacks.	Compliant	N/A
61	Are source emission tests on the recovery boiler, lime kiln & power boiler being undertaken annually? Is an odour audit (including LDAR) being undertaken annually?	Ektimo Emissions Testing Reports September 2021, November 2021, March 2022 Ektimo LDAR Testing Report February 2022	Emission testing on the recovery boiler, lime kiln & power boiler provided by CEWS. Sensors calibrated and checked six monthly. An odour audit (including LDAR) is being twice each year. The auditing takes place in September (2021) and February (2022) each year, with LDAR completed February 2022.	Compliant	N/A
61A	Is the concentration of each pollutant specified being monitored at each discharge point?	Ektimo Emissions Testing Reports September 2021, November 2021, March 2022	Yes testing includes Solid particles, fine particulate matter (PM10), sulphur trioxide (as SO3), dioxins and furans, metals type 1 and 2 substances, chlorine, carbon dioxide, oxygen at Stacks 1 and 2. At other discharge points monitoring variously includes Solid particles, hydrogen chloride, carbon dioxide, oxygen, and methanol	Compliant	N/A
62	Has a groundwater monitoring strategy been developed that includes - installation of piezo's (shallow & deep) that are representative of irrigated trees, non-irrigated buffers & untreated areas?	Water Management Plan MPL-TUM-ENV-007-3 June 2021 ECMR 2022 Farm and Environmental Monitoring Report 2022 EPL Annual Return 2022	A groundwater strategy has been developed and is described in the Water Management Plan June 2021. It include shallow and deep piezometers in irrigated and non-irrigated areas. The results are reported in the ECMR 2022.	Compliant	N/A

63	Have piezo's been installed in the vicinity of winter storages to monitor leakages? Has there been any significant leakages?	Water Management Plan MPL-TUM-ENV-007-3 June 2021 ECMR 2022 Farm and Environmental Monitoring Report 2022 EPL Annual Return 2022	Yes, piezometers have been installed in the vicinity of the winter storage facility. Groundwater chemistry and standing water levels do not indicate leakage. No observable soaks, green vegetation or water in down gradient waterways noted at the time of the audit.	Compliant	N/A
64	Have DWLC been supplied details of piezo's?	Email to WaterNSW sighted during audit. Bore registration from WaterNSW sighted during previous audits, no new piezos installed.	Registration for groundwater monitoring bores cited and dated 2012. No new piezos have been installed during the reporting period.	Compliant	Consolidate CoA
65	Is an annual interpreted report on the groundwater monitoring program being submitted to DLWC?	Email to WaterNSW sighted during audit	Response from WaterNSW sighted dated 09/11/22 included groundwater data submission, confirming lodgement of correspondence against Visy approvals.	Compliant	Consolidate CoA
66	Is an annual soils monitoring program in all areas used for effluent irrigation being undertaken?	ECMR 2022 Soil Management Plan MPL-TUM-ENV-005-3 EPL Annual Return 2022	A soils monitoring program for the irrigation areas is being completed.	Compliant	N/A
67	Are the required parameters being tested?	ECMR 2022 Soil Management Plan MPL-TUM-ENV-005-3 EPL Annual Return 2022	The required soil parameters are being tested.	Compliant	N/A
68	Has the soil monitoring program indicated that effluent irrigation is having an adverse impact on the sustainability of soils? If so has an amended plan of effluent disposal been prepared to the satisfaction of DLWC?	ECMR 2022 Soil Management Plan MPL-TUM-ENV-005-3 EPL Annual Return 2022	Soil nutrient levels reported in the ECMR 2022 and attributes are typical of local soil conditions.	Compliant	Consolidate CoA
69	Is toxicity testing of irrigation water reuse & event based surface water monitoring being undertaken?	ECMR 2022 Soil Management Plan MPL-TUM-ENV-005-3 EPL Annual Return 2022	Toxicity testing not carried out. Not compliant. This is an ongoing non-compliance as this CoA is intended to be retired.	Not-compliant	Removal/consolidation of CoA.
70	Are all monitoring results arising from the DA conditions being submitted annually to EPA, DLWC, the Council & the community consultative committee?	ECMR 2022 EPL Annual Return 2022	Results observed as being sent to appropriate departments	Compliant	N/A
71	Are monitoring results made available to DG upon request?	ECMR 2022	No results requested this reporting period, monitoring results observed as available.	Compliant	N/A
Independent Environmental Audit					
71	Is an annual independent environmental audit being undertaken?	Past Environmental reports for 2016, 2017, 2018, 2019, 2020, 2021	NGH Pty Ltd conducted audits 2017, 2018, 2019, 2020, 2021 and current.	Compliant	N/A
71A	Are 12 monthly independent audits being undertaken on the use of Non-Standard Fuels?	ECMR 2016 - 2022	Non-standard fuel not in use.	Not triggered	N/A
Community Consultation					
72	Is a community consultative committee established? If so, what are the details - frequency of meetings, how issues raised are dealt with, who are the representatives?	Minutes sighted for Aug 21, Sep 21, Dec 21, Feb 22, April 22, Jun 22	Yes, meetings held every two months with local reps, Chamber of Commerce, Landcare, Visy reps. Plant operation and additional information, responses to enquiries and complaints.	Compliant	N/A
73	Is a telephone service being operated, maintained & promoted that allows members of the public to report unacceptable noise or air quality impacts?	https://www.visy.com.au/envy-appv-mgmt-plan/	Number maintained and advertised through web site, signage minutes of CCC.	Compliant	N/A
74	Is a complaints register being maintained with adequate detail?	Quarterly complaints registers ECMR 2022 Appendix 9	A complaint register is being maintained and electronically managed in Vault. It has sufficient detail to record track and manage complaints.	Compliant	N/A
75	Has the effectiveness and the degree of public satisfaction with the complaints service been audited?	As per previous audit feedback from the public in the reporting period (x4). Visy quarterly Internal Audit reports of the Complaints System	Direct feedback from the public is not sought with each complaint, however, complainants have offered thanks for responses in the reporting period. The internal audit reports found the system was generally compliant.	Compliant	Consolidate CoA
76	Is Visy providing a copy of the complaints register every 3 months to Council & EPA & accompanied by an internal audit report of the system?	Major Projects Portal Quarterly Submission of Complaints Register sighted November 2022.	Complaints for the quarter forwarded with summation and analysis of the type and probable cause of complaint.	Compliant	N/A
Archaeology & Heritage					
77	Has the recommendations from the Cultural Heritage Assessment been implemented to the satisfaction of the DG?	Site observations	No new works this reporting period due to lack of funding and availability of resources.	Compliant	N/A

80	Has any Aboriginal artefacts been identified during operation of the mill? If so, were the correct procedures & reporting undertaken?	Interview M O'Donovan	No Aboriginal objects have been reported in the last twelve months.	Compliant	N/A
Fire Fighting Control					
82	Is a 4WD Fire Tanker with 3600L water carrying capacity on site?	Registration receipt for main fire tanker (3600L) sighted. Peris Com Luke Manton (Visy Safety Coordinator).	Isuzu Fire tanker available on site. Estimated volume 3600L. Pink slip and registration obtained for fire tanker to ensure serviceability. Additional 1500L tanker purchased Dec 2021 for use in log yard as initial response.	Compliant	N/A
83	Is the tanker available to the Gilmore Bush Fire Brigade?	Interview M O'Donovan The Unit is labelled with Gilmore Fire Brigade.	The tanker is available on request.	Compliant	N/A
84	Is there a minimum of 10 staff that have received Rural Fire Service basic fire fighter standard training available? Is a minimum of 1 staff member with advanced fire fighter standard competency training available?	Training records Noggin provided	Internal training completed. New employees completed various fire training units during the reporting period.	Compliant	N/A
85	Is the maintenance of bush fire fighting equipment at all times in accordance with current bush fire control and safety practice & in consultation with TSC Fire Control Officer?	Noggin system training record register sighted	As per the 2021 audit ERT training includes tanker maintenance review and checks.	Compliant	N/A
Environmental Officer					
88	Is the Environmental Officer that is appointed qualifications acceptable to the DG?	Matt Donovan HSE Manager still primary Isabella Kane - Enviro Officer since Nov 2022	Matthew O'Donovan is the HSE manager. Isabella Kane to be nominated as alternate with the department in future.	Compliant	
Cooling Tower					
90	Does the operation of the cooling tower comply with AS3666 - 1995 & with microbial control provisions of the Public Health Act, 1991 & Regulations?	Monthly Water Treatment Reports (Buckman Laboratories) July 2021 - June 2022	Cooling towers maintained and monitored continuously. Weekly testing of waters sampled is conducted by Buckman Laboratories and reported monthly. No exceedances noted for the reporting period. Reporting moved from quarterly to monthly documentation as of April 2021.	Compliant	N/A
Compliance with Dangerous Goods Act					
91	Compliance with Dangerous Goods Act 1975?	Hazard Audit Dec 2021, Pinnacle Risk Management.	Visy now has an annual Hazard review process in place to identify issues and propose solutions. External hazard report by Pinnacle Risk Management in Dec 2021 found general compliance and some minor matters for attention by Visy.	Compliant	N/A
Traffic Noise					
93	Have Mr & Mrs Beale & Mr F Dutton requested any window or acoustic barrier treatments? If so what has been done?	Interview M O'Donovan Google images of Beal Residence 2006 and present.	Dutton residence sold to Steunkal has been resold to an unknown third party. Beal residence was demolished.	Compliant	Ofl 2017/005, Consolidate or remove condition
Public Notification of Wastewater Discharge					
94	Has Visy given public notice of any impending wastewater discharge from its wastewater storages including those persons downstream of the site?	EPL Annual Return 2022 Winter Storage Dam records	Nil intended discharges in this reporting season.	Not triggered	N/A
Truck Scheduling					
95	Has a truck scheduling been submitted to the DG & how often is it required to be reviewed? Show evidence of the review	ECMR 2022 ECMR Appendix 6 - Monthly HV Movement Data	Heavy vehicle movements submitted to DP&E on an annual basis in the ECMR. Figures are reviewed annually as part of the ECMR preparation. Truck movements minimised between WW and the Mill by backloading with white pulp. Introduction of A-doubles have decreased HV movement numbers for exported product and vehicles though Adelong. White pulp trained from Port (Sydney/Melbourne) to Wagga Wagga reducing HV numbers on the Hume Highway.	Compliant	N/A
Process Water Reuse					
96	How often is the process water use report required to be reviewed? Show evidence of reviews	Visy Process Water Review 2121 23/12/21	Process water reuse was last reviewed by a site process engineer on December 2021. This review has yet to be submitted to DP&E.	Compliant	N/A
Concept Approval CA06_0159					
Administrative Conditions					

1.1	<p>Is the project being carried out generally in accordance with:</p> <p>a) Major Projects Application 06-0159 b) Visy pulp & paper proposed mill expansion, Tumut, NSW, Final EIS (Jan 2007) c) Visy pulp & paper proposed mill expansion, Tumut, NSW, Submissions Report (Mar 2007) d) the Statement of Commitments e) Tumut mill expansion - Project component phasing changes (Jun 2007) f) conditions of this approval</p>	<p>Site observations MetroMap Imagery (2020) Interview M O'Donovan Official Caution issued to Visy Pulp and Paper Pty Ltd (MPL06_0159) Snowy Valleys LGA – DPE, 3/02/2022 Letter 'Visy Tumut – Woodyard Stacker Reclaimers Project, GHD 17 May 2021</p>	<p>During the site inspection a large excavated area adjacent the waste yard, in the northeastern section of the mill footprint, was observed. High-resolution aerial imagery (latest 2020) shows this area previously comprised vegetation plantings. This fill material was utilised in the construction of the new Woodyard Stacker Reclaimer. Although a letter from GHD (dated 17 May 2021) confirms that the proposed stacker reclaimer should be considered as being consistent with the EP&A Act, no evidence was included in the letter that this extended to the excavation of fill from the observed area.</p> <p>Additionally, Visy were issued with an Official Caution by DPE on 3/02/2022 due to the construction of a storage shed on site that exceeded the approved storage shed design area. Visy have since lodged a mod application to regularise the use of the shed as built.</p> <p>Other activities on site were observed to be generally in accordance with specified approvals and documents.</p>	Not compliant	Obtain retroactive approval for the excavation activities.
1.3	<p>Have there been any inconsistencies with this approval or any other approvals?</p>	<p>Previous audit report (NGH, 2021) Interview M O'Donovan</p>	<p>Several inconsistencies between the DA, Concept Approval (CA) and the Project Approval (PA) and are still outstanding. A plan exists for modification of CoA where inconsistencies occur, however, other planning issues have precedence.</p>	Not compliant	Inconsistent CoA's flagged with DP&E, action in 2018.
Compliance Monitoring & Tracking					
3	<p>Has a compliance tracking program been developed & implemented that includes:</p> <p>a) periodic review b) periodic reporting to relevant approval authorities c) a program for independent environmental auditing d) means of rectifying non-compliances identified e) provisions & framework that demonstrates the regulatory interactions between approval instruments & licences</p>	<p>ECMR 2022 EPL Annual Return 2022 Previous audit report (NGH, 2021)</p>	<p>a) periodic review using ECMR, EPL Annual Return. b) Annual EPL report and provision of EMR to relevant authorities cited. c) Independent Auditing required and completed annually d) Non-compliances added to targets for subsequent years or immediate correction. e) EMR and management plans</p>	Compliant	N/A
Community Information Consultation & Involvement					
4.1	<p>Is Visy continuing to participate with the Community Consultation Committee?</p>	<p>Minutes sighted for Aug 21, Sep 21, Dec 21, Feb 22, April 22, Jun 22</p>	<p>Visy are holding quarterly CCC meetings, minutes sighted.</p>	Compliant	N/A
4.2	<p>Is a telephone number, postal address & email address available for community complaints & displayed on a sign near the entrance to site?</p>	<p>https://www.visy.com.au/env-appy-night-plan/</p>	<p>Number maintained and advertised through web site, signage and in the minutes of CCC.</p>	Compliant	N/A
4.3	<p>Is a complaints register being maintained with the following information:</p> <p>a) date, time b) means by which complaint was made (telephone, email, etc) c) personal details d) nature of complaint e) action taken f) if no action, why?</p>	<p>Site observations Quarterly complaints registers ECMR 2022 Appendix 9</p>	<p>Complaints numbered 21 for the reporting period. Quarterly complaint Audit sighted, included review of complaints and reference to the last four years of data. Odour issues comprised all complaints during the reporting period and each complaint is investigated and responded to.</p>	Compliant	N/A
4.4	<p>Is appropriate electronic info being made available on website, including:</p> <p>a) info on development, project components & status b) copy of this approval c) copy of approvals/licences required by this development d) copy of environmental monitoring program & environmental management required e) details of outcomes of reviews & audits f) details of points of contact</p>	<p>https://www.visy.com.au/env-appy-night-plan/</p>	<p>The Visy Tumut web site has Project assessment documents and consent, licences for EPL and water extraction, Management Plans, Annual monitoring reports, EPL compliance report and audit outcomes. Contact details (24h) are also available on the website.</p>	Compliant	N/A
Environmental Management					
5	<p>Is an OEMP being maintained?</p>	<p>OEMP Rev 4, 30 August 2021</p>	<p>OEMP updated 30 August 2021. Doc MPL-TUM-ENV-001-4. Environmental targets updated on annual basis, 2022 - 2023 Targets included.</p>	Compliant	N/A
Environmental Reporting					
6.1	<p>Has there been any events where there was actual or potential significant off-site impacts on people or the biophysical environment? If so was it reported to the DG within 12hrs of the event & full written details provided to DG within 7 days?</p>	<p>ECMR 2022</p>	<p>Nil reportable events in the 2021/22 reporting period.</p>	Not triggered	N/A
6.2	<p>Were the requirements of the DG met to address cause or impact of incident?</p>	<p>ECMR 2022</p>	<p>Nil reportable events in the 2021/22 reporting period.</p>	Not triggered	N/A

6.3	<p>Is a Annual Environmental Management Report (AEMR) being submitted to the DG reviewing performance against the OEMP and does it include:</p> <ul style="list-style-type: none"> a) details of compliance with this approval b) copy of complaints register c) identification of any circumstances in which the environmental impacts & performance of the project during the year have not been generally consistent with environmental impacts & performance predicted d) results of environmental monitoring & interpretation <p>Is appropriate electronic info being made available on website, including:</p> <ul style="list-style-type: none"> a) info on development, project components & status b) copy of this approval c) copy of approvals/licences required by this development d) copy of environmental monitoring program & environmental management required e) details of outcomes of reviews & audits f) details of points of contact 	ECMR 2022 sighted	<p>ECMR 2022 sighted. Compliance report included as App 1 to the document. Complaints dealt with in section 3.1 and listed in App 9. Complaints from odour exceedances noted and source identified as is corrective action. Monitoring results and interpretations documented in ECMR and App 3, 4, 6, 7, 8, and 10.</p>	Compliant	N/A	
4.4	<p>Is the project being carried out generally in accordance with:</p> <ul style="list-style-type: none"> a) Major Projects Application 06-0159 b) Visy pulp & paper proposed mill expansion, Tumut, Final EIS (Jan 2007) c) Visy pulp & paper proposed mill expansion, Tumut, NSW, Submissions Report (Mar 2007) d) concept approval 06_0159 e) the Statement of Commitments f) Tumut mill expansion - Project component phasing changes (Jun 2007) g) conditions of this approval <p>Have there been any inconsistencies with this approval or any other approvals?</p>	<p>http://www.visy.com.au/env-appv-nmgt-plan/</p>	<p>The Visy Tumut web site has Project assessment documents and consent, licences for EPL and water extraction, Management Plans, Annual monitoring reports, EPL compliance report and audit outcomes. Contact details (24h) are also available on the website.</p>	Compliant	N/A	
<p>Project Approval 06_0159</p> <p>Administrative Conditions</p>						
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1.2	<p>Have there been any inconsistencies with this approval or any other approvals?</p>	EPL, WALs, RRE, RRO, ECMR 2022	<p>Minor inconsistency have arisen due to restructuring of government departments. Addressed through new departments. However the operation is generally consistent with the consent. Compliant.</p>	Compliant	N/A	
1.5	<p>Are all licences, permits & approvals obtained & maintained as required?</p>	EPL, WALs, RRE, RRO, ECMR 2022	<p>Refer to Condition 91 Development Consent EPL10232 WAL 40AL405643 WAL 40AL405644 WAL 40AL412076 NDG035066 (Dangerous Goods) Woodlawn PHR acid mine tailings trial order 2020 Woodlawn PHR acid mine tailings trial exemption 2020 Captains Flat trial order 2022 Coalstar Flat trial exemption 2022</p>	Compliant	N/A	
<p>Dust Generation</p>						
2.1	<p>Is dust generation being minimised on site and mitigation where required?</p>	Site observations during the audit	<p>No dust observed on site at the time of the audit as 2021-2022 has seen above average rainfall. The main access roads are sealed. Water carts are available on site for dust suppression.</p>	Compliant	N/A	
<p>Odour</p>						
2.2	<p>Is offensive odour being prevented from being emitted beyond the boundary of site?</p>	ECMR 2022	<p>There were 21 odour complaints for the 21/22 period. This is up from 17 complaints in the previous period but well below 60+ complaints four years ago. The source of the odour was identified and in most cases minimised through action. Offensive odour is prevented from leaving the boundary most of the time. The majority of odour produced on site is prevented from leaving the site boundary and a consistent decrease in odour-related complaints has been observed during previous and current reporting periods.</p>	Compliant		
2.3	<p>Is an odour collection & reduction system being operated for relevant new plant?</p>	Air Quality Management Plan MPL-TUM-ENV-002-3 May 2021	<p>The capture and management of gasses causing odour is a key aspect of existing and new plant. Air Quality Management Plan 2021 details the management of emissions. Reference to the odour complaint system identifies the sources of most odour complaints. This indicates that Visy staff are aware of the various odour sources producing complaints. Annual plant shutdowns will typically include modifications to the plant and in subsequent years this has focused on odour management. Repairs to the liquor tank 102 roof have decreased fugitive emissions by improving the operation of the HVLC system. Increased focus on process control has also decreased odour generation. This represents evidence of ongoing improvement in odour management.</p>	Compliant	N/A	

2.4	Are vapour compression evaporators for both new & existing plant being operated to reduce the level of chemical oxygen demand in clean condensate & reduced to 50% of existing levels?	Cannot comply as no longer applicable. Condition needs changing	A comparison of the COD levels in the clean condensate between 2007 and any time after 2010 is no longer meaningful. This is due to process changes in the production of clean condensate streams. Previous comparisons, now believed to be flawed indicated a COD reduction in the clean condensate that was close to but less than 50%.	Not-compliant	Make application to DPE to consolidate or remove condition.	In progress.																																																																																																																																																															
Best Available Technology																																																																																																																																																																					
2.7	Is the BAT being used for all combustion & air emission control equipment associated with the project?	Site observations, plant replacement, odour monitoring and plant controls.	The operation of the plant is managed through continuous monitoring of process inputs and outputs and conditions. Odour sources are routinely monitored by certified external parties. Inclusion of advanced controllers on lime kilns has improved overall controls.	Compliant	N/A																																																																																																																																																																
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2.9	Is air monitoring/air discharge points being identified as provided below:	<p>ECMR 2022</p> <table border="1" data-bbox="427 698 794 1115"> <thead> <tr> <th>Monitoring / Discharge Point</th> <th>Monitoring/ Discharge Point Location</th> </tr> </thead> <tbody> <tr> <td>Main Stack 2</td> <td>Main Stack 2</td> </tr> <tr> <td>Recovery Boiler 2</td> <td>In the vicinity of Recovery Boiler 2 and before the junction with Main Stack 2</td> </tr> <tr> <td>Natural Gas Boiler</td> <td>In the discharge duct downstream of Natural Gas Boiler for Main Stack 2</td> </tr> <tr> <td>Multi-Kiln Boiler</td> <td>In the discharge duct downstream of the Multi-Kiln Boiler for Main Stack 2</td> </tr> </tbody> </table>	Monitoring / Discharge Point	Monitoring/ Discharge Point Location	Main Stack 2	Main Stack 2	Recovery Boiler 2	In the vicinity of Recovery Boiler 2 and before the junction with Main Stack 2	Natural Gas Boiler	In the discharge duct downstream of Natural Gas Boiler for Main Stack 2	Multi-Kiln Boiler	In the discharge duct downstream of the Multi-Kiln Boiler for Main Stack 2	A Continuous Emissions Monitoring System (CEMS) is installed and monitors at: Stack 1, stack 2, Main stack 2, Recovery Boiler 2(B), Natural Gas Boiler, Multifuel Boiler, Lime Kiln 2 (B), Gas Turbine. Compliant.	Compliant	N/A																																																																																																																																																						
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2.10	Has any of the below concentration limits been exceeded at any of the discharge points?	<p>ECMR 2022 ECMR Appendix 2 - CEMS Exceedance Report EPL Annual Return 2022</p>	<p>ECMR 2022 ECMR Appendix 2 - CEMS Exceedance Report EPL Annual Return 2022</p>	Not-compliant	On going routine maintenance to the plant.																																																																																																																																																																
	<p>Table 2 - Maximum Allowable Discharge Concentration Limits (Main Stack 2)</p> <table border="1" data-bbox="491 645 794 698"> <thead> <tr> <th>Pollutant</th> <th>100 Percentile limit (ppm¹)</th> </tr> </thead> <tbody> <tr><td>Carbon</td><td>0.5</td></tr> <tr><td>Chlorine</td><td>0.5</td></tr> <tr><td>Hydrogen Chloride</td><td>0.5</td></tr> <tr><td>Hydrogen Sulphide</td><td>0.5</td></tr> <tr><td>Nitrogen Oxides</td><td>500</td></tr> <tr><td>Sulphur Dioxide</td><td>500</td></tr> <tr><td>Total Particulates</td><td>100</td></tr> <tr><td>Trace Metals</td><td>20</td></tr> <tr><td>Boilers and Furnaces (on SO₂)</td><td>20</td></tr> <tr><td>CO₂ (on SO₂)</td><td>0.1</td></tr> <tr><td>CO₂ (on SO₂)</td><td>0.1</td></tr> <tr><td>Hydrogen Fluoride</td><td>20</td></tr> <tr><td>Hydrogen Iodide</td><td>20</td></tr> <tr><td>H₂SO₄ (on SO₂)</td><td>20</td></tr> <tr><td>H₂SO₄ (on SO₂)</td><td>20</td></tr> </tbody> </table> <p>Table 3 - Averaging Periods</p> <table border="1" data-bbox="491 1115 794 1169"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr><td>SO₂ (on SO₂)</td><td>1 hour</td></tr> <tr><td>NO_x (on SO₂)</td><td>1 hour</td></tr> <tr><td>Hydrogen Chloride</td><td>1 hour</td></tr> <tr><td>Hydrogen Sulphide</td><td>1 hour</td></tr> <tr><td>Nitrogen Oxides</td><td>1 hour</td></tr> <tr><td>Sulphur Dioxide</td><td>1 hour</td></tr> <tr><td>Total Particulates</td><td>1 hour</td></tr> <tr><td>Trace Metals</td><td>1 hour</td></tr> <tr><td>Boilers and Furnaces</td><td>1 hour</td></tr> <tr><td>CO₂ (on SO₂)</td><td>1 hour</td></tr> <tr><td>CO₂ (on SO₂)</td><td>1 hour</td></tr> <tr><td>Hydrogen Fluoride</td><td>1 hour</td></tr> <tr><td>Hydrogen Iodide</td><td>1 hour</td></tr> <tr><td>H₂SO₄ (on SO₂)</td><td>1 hour</td></tr> <tr><td>H₂SO₄ (on SO₂)</td><td>1 hour</td></tr> </tbody> </table> <p>Table 3 - Maximum Allowable Discharge Concentration Limits (Natural Gas Boiler)</p> <table border="1" data-bbox="491 1169 794 1223"> <thead> <tr> <th>Pollutant</th> <th>100 Percentile limit (ppm¹)</th> </tr> </thead> <tbody> <tr><td>Carbon</td><td>100</td></tr> <tr><td>Chlorine</td><td>100</td></tr> <tr><td>Hydrogen Chloride</td><td>100</td></tr> <tr><td>Hydrogen Sulphide</td><td>100</td></tr> <tr><td>Nitrogen Oxides</td><td>500</td></tr> <tr><td>Sulphur Dioxide</td><td>500</td></tr> <tr><td>Total Particulates</td><td>100</td></tr> <tr><td>Trace Metals</td><td>20</td></tr> <tr><td>Boilers and Furnaces</td><td>20</td></tr> <tr><td>CO₂ (on SO₂)</td><td>0.1</td></tr> <tr><td>CO₂ (on SO₂)</td><td>0.1</td></tr> <tr><td>Hydrogen Fluoride</td><td>20</td></tr> <tr><td>Hydrogen Iodide</td><td>20</td></tr> <tr><td>H₂SO₄ (on SO₂)</td><td>20</td></tr> <tr><td>H₂SO₄ (on SO₂)</td><td>20</td></tr> </tbody> </table> <p>Table 4 - Maximum Allowable Discharge Concentration Limits (Multi-Kiln Boiler)</p> <table border="1" data-bbox="491 1223 794 1276"> <thead> <tr> <th>Pollutant</th> <th>100 Percentile limit (ppm¹)</th> </tr> </thead> <tbody> <tr><td>Carbon</td><td>0.05</td></tr> <tr><td>Chlorine</td><td>0.05</td></tr> <tr><td>Hydrogen Chloride</td><td>0.05</td></tr> <tr><td>Hydrogen Sulphide</td><td>0.05</td></tr> <tr><td>Nitrogen Oxides</td><td>500</td></tr> <tr><td>Sulphur Dioxide</td><td>500</td></tr> <tr><td>Total Particulates</td><td>100</td></tr> <tr><td>Trace Metals</td><td>20</td></tr> <tr><td>Boilers and Furnaces</td><td>20</td></tr> <tr><td>CO₂ (on SO₂)</td><td>0.1</td></tr> <tr><td>CO₂ (on SO₂)</td><td>0.1</td></tr> <tr><td>Hydrogen Fluoride</td><td>20</td></tr> <tr><td>Hydrogen Iodide</td><td>20</td></tr> <tr><td>H₂SO₄ (on SO₂)</td><td>20</td></tr> <tr><td>H₂SO₄ (on SO₂)</td><td>20</td></tr> </tbody> </table> <p>Table 5 - Maximum Allowable Discharge Concentration Limits (Gas Turbine)</p> <table border="1" data-bbox="491 1276 794 1330"> <thead> <tr> <th>Pollutant</th> <th>100 Percentile limit (ppm¹)</th> </tr> </thead> <tbody> <tr><td>Carbon</td><td>100</td></tr> <tr><td>Chlorine</td><td>100</td></tr> <tr><td>Hydrogen Chloride</td><td>100</td></tr> <tr><td>Hydrogen Sulphide</td><td>100</td></tr> <tr><td>Nitrogen Oxides</td><td>500</td></tr> <tr><td>Sulphur Dioxide</td><td>500</td></tr> <tr><td>Total Particulates</td><td>100</td></tr> <tr><td>Trace Metals</td><td>20</td></tr> <tr><td>Boilers and Furnaces</td><td>20</td></tr> <tr><td>CO₂ (on SO₂)</td><td>0.1</td></tr> <tr><td>CO₂ (on SO₂)</td><td>0.1</td></tr> <tr><td>Hydrogen Fluoride</td><td>20</td></tr> <tr><td>Hydrogen Iodide</td><td>20</td></tr> <tr><td>H₂SO₄ (on SO₂)</td><td>20</td></tr> <tr><td>H₂SO₄ (on SO₂)</td><td>20</td></tr> </tbody> </table>	Pollutant	100 Percentile limit (ppm ¹)	Carbon	0.5	Chlorine	0.5	Hydrogen Chloride	0.5	Hydrogen Sulphide	0.5	Nitrogen Oxides	500	Sulphur Dioxide	500	Total Particulates	100	Trace Metals	20	Boilers and Furnaces (on SO ₂)	20	CO ₂ (on SO ₂)	0.1	CO ₂ (on SO ₂)	0.1	Hydrogen Fluoride	20	Hydrogen Iodide	20	H ₂ SO ₄ (on SO ₂)	20	H ₂ SO ₄ (on SO ₂)	20	Pollutant	Averaging Period	SO ₂ (on SO ₂)	1 hour	NO _x (on SO ₂)	1 hour	Hydrogen Chloride	1 hour	Hydrogen Sulphide	1 hour	Nitrogen Oxides	1 hour	Sulphur Dioxide	1 hour	Total Particulates	1 hour	Trace Metals	1 hour	Boilers and Furnaces	1 hour	CO ₂ (on SO ₂)	1 hour	CO ₂ (on SO ₂)	1 hour	Hydrogen Fluoride	1 hour	Hydrogen Iodide	1 hour	H ₂ SO ₄ (on SO ₂)	1 hour	H ₂ SO ₄ (on SO ₂)	1 hour	Pollutant	100 Percentile limit (ppm ¹)	Carbon	100	Chlorine	100	Hydrogen Chloride	100	Hydrogen Sulphide	100	Nitrogen Oxides	500	Sulphur Dioxide	500	Total Particulates	100	Trace Metals	20	Boilers and Furnaces	20	CO ₂ (on SO ₂)	0.1	CO ₂ (on SO ₂)	0.1	Hydrogen Fluoride	20	Hydrogen Iodide	20	H ₂ SO ₄ (on SO ₂)	20	H ₂ SO ₄ (on SO ₂)	20	Pollutant	100 Percentile limit (ppm ¹)	Carbon	0.05	Chlorine	0.05	Hydrogen Chloride	0.05	Hydrogen Sulphide	0.05	Nitrogen Oxides	500	Sulphur Dioxide	500	Total Particulates	100	Trace Metals	20	Boilers and Furnaces	20	CO ₂ (on SO ₂)	0.1	CO ₂ (on SO ₂)	0.1	Hydrogen Fluoride	20	Hydrogen Iodide	20	H ₂ SO ₄ (on SO ₂)	20	H ₂ SO ₄ (on SO ₂)	20	Pollutant	100 Percentile limit (ppm ¹)	Carbon	100	Chlorine	100	Hydrogen Chloride	100	Hydrogen Sulphide	100	Nitrogen Oxides	500	Sulphur Dioxide	500	Total Particulates	100	Trace Metals	20	Boilers and Furnaces	20	CO ₂ (on SO ₂)	0.1	CO ₂ (on SO ₂)	0.1	Hydrogen Fluoride	20	Hydrogen Iodide	20	H ₂ SO ₄ (on SO ₂)	20	H ₂ SO ₄ (on SO ₂)	20	Exceedances documented in ECMR and the EPL annual Return.	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2.11	Is compliance being met with averaging periods for pollutants emitted from the discharge points?	ECMR 2022 ECMR Appendix 2 - CEMS Exceedance Report EPL Annual Return 2022	Exceedances reported for the Averaging period and noted in ECMR 2022. Averaging periods appropriate.	Not-compliant	N/A																																																																																																																																																																
Noise Impacts																																																																																																																																																																					
2.12	Has vibration resulting from operation exceeded the evaluation criteria presented in British Standard BS6472 for low probability of adverse comment, at any affected residential dwelling?	Site observations Interview M O'Donovan	No vibration monitoring completed. No vibration works (blasting, rock breaking, piling, compaction etc) in the reporting period. No residences within close proximity to the site.	Not triggered	N/A																																																																																																																																																																
	<p>Vibration does not cause concern which might result in various levels of adverse comment. The following table provides a summary of the results of the vibration monitoring.</p> <table border="1" data-bbox="619 824 794 1115"> <thead> <tr> <th>Measure</th> <th>Low probability of adverse comment</th> <th>Adverse comment</th> </tr> </thead> <tbody> <tr> <td>Residential buildings</td> <td>0.2 to 0.4</td> <td>0.4 to 0.8</td> </tr> <tr> <td>Residential buildings</td> <td>0.1 to 0.2</td> <td>0.2 to 0.4</td> </tr> <tr> <td>Height</td> <td>0.1 to 0.2</td> <td>0.2 to 0.4</td> </tr> </tbody> </table>	Measure	Low probability of adverse comment	Adverse comment	Residential buildings	0.2 to 0.4	0.4 to 0.8	Residential buildings	0.1 to 0.2	0.2 to 0.4	Height	0.1 to 0.2	0.2 to 0.4																																																																																																																																																								
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2.15	Has the noise contribution from the project to the background acoustic environment exceeded the maximum allowable noise contribution:			The attended noise monitoring data indicated that noise from the site was inaudible during 7 out of 24 measurements. Where site noise was audible and limits applied, the LAeq(15-min) multiple estimated noise contributions did not comply with the relevant limits during the night period, however noise agreements exist with all properties monitored. Most of the day and evening time readings were affected by wind speeds >3m/s and the results could not be used. In general based on Mod -4 Aug 2020 allows for noise above previous limits where agreements are in place.	Compliant	Despite change in monitoring date to Feb 2022, wind speeds continue to influence night and evening noise results.	
2.16	Noise monitoring shall be: a) at any point within the residential boundary, or at any point within 30m of dwelling b) 30m from boundary c) subject to the modification factors	EMM Annual Attended Noise Monitoring Report, February 2022		Noise monitoring conducted at the appropriate locations during the reporting period.	Compliant	N/A	
Soil & Water Quality Impacts							
2.17	Has any pollution of waters under the POEO Act s1.20 been caused by the project?	Water storage levels 2021/22 Farm and Environmental Monitoring Report 2022 Site observations Interview M O'Donovan		No discharges to the surface water system have occurred in the reporting period. No incidents resulting in offsite impacts, even during periods of above average rainfall in the reporting period. No runoff observed during site inspection.	Compliant	N/A	
2.18	Has surface water runoff been maintained at similar levels post-construction?	Water storage levels 2021/22 Stormwater system plans and site observations.		All clean stormwater runoff is directed to controlled water quality treatment ponds prior to release off site.	Compliant	N/A	
Waste Generation Management							
2.21	Is all waste materials removed from site being directed to a licenced landfill permitted to accept that waste?	ECMR 2023 Annual Waste Report 21/22 Interview M O'Donovan		Waste is directed to waste facilities at: > HI Quality EPL 10398 Goulburn > Woodlawn EPL 20476 Goulburn. > Captains Flat EPL (Dept Regional NSW) > Tumbalong Landfill (commenced January 2021) EPL 21440	Compliant	N/A	
2.22	Is the treatment, reuse & recycling on site of any waste oils, excavated soils, slurries, dusts & sludges being maximised?	ECMR 2022		Oils taken by contractor Cleanaway contractors. Excavated soils are stored at the rear of the plant and used on site for earthworks. Organic dusts are fed to the boiler. Slurries and sludges are processed in the waste water treatment system and irrigated on site. Resource recovery exemption now in place for the reuse of Dregs and grits, fly ash and boiler sand at Woodlawn Mine rehabilitation site. A total of 5028t sent to Woodlawn during the reporting period and a total of 489 was sent to Captains Flat during the reporting period.	Compliant	N/A	
2.23	Has any offsite generated waste been accepted or received onsite unless as permitted by the EPL?	ECMR 2022		Visy accepted 241,733t of waste paper and 426,757t of sawmill chip as a raw fibre source during the reporting period. Visy also powered the boilers on site with waste generated on site and received from off site in the form of timber residues.	Compliant	N/A	
2.24	Are waste being classified as per Environmental Guidelines: Assessment, Classification & Mgmt of Liquid & Non-Liquid Wastes (DECC 2004)?	Previous audit report (NGH, 2021) VP9-10-10.3-PN-009 Solid Waste Management Plan 2017		As per 2016-2020 audits. Waste is being classified using the NSW Waste Classification Guidelines. Compliant.	Compliant	N/A	
Wastewater Management							
2.25	Is effluent irrigation on existing & expanded area identified in the EA being undertaken in a sustainable manner including: a) use of crops that will reduce soil salinity levels b) measuring to maintain crop biodiversity - e.g. Lucerne crop rotation c) the provision of subsurface drainage under low-lying areas d) use of best practice ameliorative measures where soil improvement is determined to be necessary	Water Management Plan June 2022 Farm and Environmental Monitoring Report 2021/22 ECMR 2022		Waste water testing is routinely carried out. Soil and plant analysis of crops/pastures is completed for the monitoring period on the Gadara Park Farm. Nutrient balances calculated to ensure net accumulation of nutrients is managed. Soils are limed to manage soil pH. Crops are rotated between millet, winter cereals and lucerne. Testing carried out in October 2021 and April 2022 of the reporting period.	Compliant	N/A	
2.26	Are all those lands identified in the EA for the purpose of irrigation of effluent available for effluent irrigation?	MetroMap Images Water Management Plan June 2022 Farm and Environmental Monitoring Report 2021/22 ECMR 2022		All farm land identified in the EA is available for irrigation. However, Visy have minimised effluent production and as such need less land. As a consequence 16 ha of irrigation land to the east of the centre pivots is currently not irrigated.	Compliant	N/A	

2.27	Has the winter storage dam been extended?	Site observations Interview M O'Donovan	No extension of the winter storage dam occurred in the reporting period.	Compliant	N/A
2.28	Have all treated wastewater discharges occurred as permitted by the DECC & in accordance with DECC's Environmental Guidelines: Use of Effluent by Irrigation (2004), including relevant discharge information?	Water Management Plan June 2021 Farm and Environmental Monitoring Report 2021/2022 ECMR 2022	Discharges to the irrigation area are planned, implemented, monitored and reviewed in accordance with the Water Management Plan 2021 and the DECC (EPA) guidelines. Groundwater and soil monitoring results indicate that accumulations in the soil and impacts to groundwater are being effectively managed.	Compliant	N/A
Hazards & Risks					
2.29	Has any structures been demolished? if so was it in accordance with AS2601:1991?	Site observations Interview M O'Donovan	No demolition has occurred during the reporting period.	Compliant	N/A
2.31	Is the storage & handling of dangerous goods as per AS?	Observations on site Pinnacle Hazard Audit Dec 2021	Hazard Audit undertaken in Dec 2021 sighted during audit. Some minor findings were identified and are being scheduled for action.	Compliant	N/A
Traffic impacts					
2.34 & 2.35	Has any traffic access arrangements changed?	Traffic Management Plan (MPI- TUM-ENV-006-3) August 2021 Observations on site Monthly Day/Night Movements By Route 21/22	There have been no changes to the traffic access arrangements in the reporting period. Go Cup road has been upgraded and as such off site conditions are safer for drivers. A-doubles started running in July 2021, and have reduced HV numbers accessing the site and passing through Adelong.	Compliant	N/A
2.36	Is the use of B-doubles & backloading being maximised? Is the use of super B-doubles being used so as to reduce the number of heavy vehicle movements?	Traffic Management Plan (MPI- TUM-ENV-006-3) August 2021 ECMR 2022	Logs ave. 94% B doubles and 6% semi-trailers, ave. log truck load B double = 39t semi-trailer = 28t. Sawmill chip 52% B doubles and 48% semi-trailers, ave. load 37t B double and 29t semi-trailer. Paper domestic was 20% A-Double, 70% B doubles and 5% semi-trailers, ave. load 36t B double and 24t semi-trailer. Paper export 100% A-Double 44t/load	Compliant	N/A
2.37	Has there been any night time (2200-0700) semi-trailer, super B-Double or B-double movements to & from plant via Snowy Mountain Highway through Adelong or to & from the plant via MR280 north of Adelong?	ECMR 2022 ECMR Appendix 9 - Complaint Register	No movements outside of curfew period occurred.	Compliant	N/A
2.38	Do all trucks associated with the project: a) utilise air bag suspension b) minimise use of exhaust brakes at night in residential areas c) operate in a manner that reduces adverse noise impacts?	Adelong Curfew and Gocup Road Toolbox Talk (COR TBT 017) Complaints register 2021/2022	Drivers and employees at Visy site are inducted and trained. A toolbox talk developed February 2015 and has been used to train new and existing staff. No complaints have been received from the public regarding airbrake noise for the reporting period. Heavy vehicles observed accessing the site at the time of the audit had airbag suspension.	Compliant	N/A
Visual Amenity Impacts					
2.42	Is all external lighting associated with the project mounted, screen & directed in such a manner so as not to create nuisance?	Site observations	Plant lighting at the time of the audit was observed to be fixed and directed toward the plant. Lights face towards work areas, no light complaints recorded. Solar lights are installed at Gadara Road intersection for queuing trucks.	Compliant	N/A
Air Quality Monitoring					

<p>Are the detailed pollutant concentrations & emission parameters in the tables below being monitored?</p> <p>Table 8 - Periodic Pollutant and Parameter Monitoring (Main Stack 2)</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Unit</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Carbon monoxide</td> <td>ppm³</td> <td>1h-12, 1h-15, 1h-16, Annually</td> </tr> <tr> <td>Lead</td> <td>ppm³</td> <td>1h-12, 1h-15, 1h-16, Annually</td> </tr> <tr> <td>Nitrogen dioxide</td> <td>ppm³</td> <td>1h-12, 1h-15, 1h-16, Annually</td> </tr> <tr> <td>Sulfur dioxide</td> <td>ppm³</td> <td>1h-12, 1h-15, 1h-16, Annually</td> </tr> <tr> <td>Total Suspended Particles</td> <td>ppm³</td> <td>1h-12, 1h-15, 1h-16, Annually</td> </tr> <tr> <td>Temperature</td> <td>°C</td> <td>1h-12, 1h-15, 1h-16, Annually</td> </tr> <tr> <td>Relative Humidity</td> <td>%</td> <td>1h-12, 1h-15, 1h-16, Annually</td> </tr> <tr> <td>Wind Speed</td> <td>m/s</td> <td>1h-12, 1h-15, 1h-16, Annually</td> </tr> <tr> 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dioxide	ppm ³	1h-12, 1h-15, 1h-16, Annually	Total Suspended Particles	ppm ³	1h-12, 1h-15, 1h-16, Annually	Temperature	°C	1h-12, 1h-15, 1h-16, Annually	Relative Humidity	%	1h-12, 1h-15, 1h-16, Annually	Wind Speed	m/s	1h-12, 1h-15, 1h-16, Annually	Wind Direction	°	1h-12, 1h-15, 1h-16, Annually	Stack Gas Velocity	m/s	1h-12, 1h-15, 1h-16, Annually	Stack Gas Temperature	°C	1h-12, 1h-15, 1h-16, Annually	Stack Gas Humidity	%	1h-12, 1h-15, 1h-16, Annually	Stack Gas Pressure	mmHg	1h-12, 1h-15, 1h-16, Annually	Stack Gas Density	kg/m ³	1h-12, 1h-15, 1h-16, Annually	Stack Gas Viscosity	Pa·s	1h-12, 1h-15, 1h-16, Annually	Stack Gas Thermal Conductivity	W/m·K	1h-12, 1h-15, 1h-16, Annually	Stack Gas Specific Heat Capacity	J/kg·K	1h-12, 1h-15, 1h-16, Annually	Stack Gas Prandtl Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Schmidt Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Lewis Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Prandtl-Schmidt Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas 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1h-15, 1h-16, Annually	Stack Gas Velocity	m/s	1h-12, 1h-15, 1h-16, Annually	Stack Gas Temperature	°C	1h-12, 1h-15, 1h-16, Annually	Stack Gas Humidity	%	1h-12, 1h-15, 1h-16, Annually	Stack Gas Pressure	mmHg	1h-12, 1h-15, 1h-16, Annually	Stack Gas Density	kg/m ³	1h-12, 1h-15, 1h-16, Annually	Stack Gas Viscosity	Pa·s	1h-12, 1h-15, 1h-16, Annually	Stack Gas Thermal Conductivity	W/m·K	1h-12, 1h-15, 1h-16, Annually	Stack Gas Specific Heat Capacity	J/kg·K	1h-12, 1h-15, 1h-16, Annually	Stack Gas Prandtl Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Schmidt Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Lewis Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Prandtl-Schmidt Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Prandtl-Lewis Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Schmidt-Lewis Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Prandtl-Schmidt-Lewis Number	-	1h-12, 1h-15, 1h-16, Annually	Parameter	Unit	Frequency	Carbon monoxide	ppm ³	1h-12, 1h-15, 1h-16, Annually	Lead	ppm ³	1h-12, 1h-15, 1h-16, Annually	Nitrogen dioxide	ppm ³	1h-12, 1h-15, 1h-16, Annually	Sulfur dioxide	ppm ³	1h-12, 1h-15, 1h-16, Annually	Total Suspended Particles	ppm ³	1h-12, 1h-15, 1h-16, Annually	Temperature	°C	1h-12, 1h-15, 1h-16, Annually	Relative Humidity	%	1h-12, 1h-15, 1h-16, Annually	Wind Speed	m/s	1h-12, 1h-15, 1h-16, Annually	Wind Direction	°	1h-12, 1h-15, 1h-16, Annually	Stack Gas Velocity	m/s	1h-12, 1h-15, 1h-16, Annually	Stack Gas Temperature	°C	1h-12, 1h-15, 1h-16, Annually	Stack Gas Humidity	%	1h-12, 1h-15, 1h-16, Annually	Stack Gas Pressure	mmHg	1h-12, 1h-15, 1h-16, Annually	Stack Gas Density	kg/m ³	1h-12, 1h-15, 1h-16, Annually	Stack Gas Viscosity	Pa·s	1h-12, 1h-15, 1h-16, Annually	Stack Gas Thermal Conductivity	W/m·K	1h-12, 1h-15, 1h-16, Annually	Stack Gas Specific Heat Capacity	J/kg·K	1h-12, 1h-15, 1h-16, Annually	Stack Gas Prandtl Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Schmidt Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Lewis Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Prandtl-Schmidt Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Prandtl-Lewis Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Schmidt-Lewis Number	-	1h-12, 1h-15, 1h-16, Annually	Stack Gas Prandtl-Schmidt-Lewis Number	-	1h-12, 1h-15, 1h-16, Annually	Parameter	Unit	Frequency	Carbon monoxide	ppm ³	1h-12, 1h-15, 1h-16, Annually	Lead	ppm ³	1h-12, 1h-15, 1h-16, Annually	Nitrogen dioxide	ppm ³	1h-12, 1h-15, 1h-16, Annually	Sulfur dioxide	ppm ³	1h-12, 1h-15, 1h-16, Annually	Total Suspended Particles	ppm ³	1h-12, 1h-15, 1h-16, Annually	Temperature	°C	1h-12, 1h-15, 1h-16, Annually	Relative Humidity	%	1h-12, 1h-15, 1h-16, Annually	Wind Speed	m/s	1h-12, 1h-15, 1h-16, Annually	Wind Direction	°	1h-12, 1h-15, 1h-16, Annually	Stack Gas Velocity	m/s	1h-12, 1h-15, 1h-16, Annually	Stack Gas Temperature	°C	1h-12, 1h-15, 1h-16, Annually	Stack Gas Humidity	%	1h-12, 1h-15, 1h-16, Annually	Stack Gas Pressure	mmHg	1h-12, 1h-15, 1h-16, Annually	Stack Gas Density	kg/m ³	1h-12, 1h-15, 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Annually	<p>ECMR 2022 Annual Return 2022</p> <p>Site observations ECMR 2022 Previous audit reports</p> <p>Site observations ECMR 2022 Previous audit reports</p>	<p>The tables in the consent condition have been compiled from a past EPL. Discussions with DPE regarding inconsistent consent conditions have occurred. DPE have indicated that they are willing to discuss this issue.</p> <p>Remove condition of consent to avoid inconsistency with EPL over time.</p> <p>See Above</p> <p>Not-compliant</p> <p>Not triggered</p> <p>Not triggered</p> <p>Not triggered</p>
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<p>3.1</p>	<p>Has any new project phases commenced since the last audit? If so, has a program to confirm air emission performance been undertaken including: a) point source emission sampling & analysis b) a comprehensive air quality impact assessment c) a comparison of results from those collected & predicted d) a comparison of results from those collected to the impact assessment criteria detailed in Approved Methods for the Sampling & Analysis of Air Pollutants in NSW e) details of any complaints relating to air quality impacts Has a report been provided to the DG & DECC with 28 days of completion of testing?</p>	<p>Site observations ECMR 2022 Previous audit reports</p>																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
<p>3.2</p>	<p>Did the program indicate any of the following: a) greater point source emissions or ground-level concentrations of air pollutants than predicted in the documents listed under condition 1.1 of this approval b) greater point source emission or ground-level concentrations of air pollutants than the impact assessment criteria detailed in Approved Methods for the Sampling & Analysis of Air Pollutants in NSW? If so has detail of remedial measures & timetable for implementation been submitted to</p>	<p>Site observations ECMR 2022 Previous audit reports</p>																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
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3.4	<p>Has any new project phases commenced since the last audit? If so, has an independent, qualified person or team been commissioned to undertake odour performance monitoring 90 days prior to commencement of this phase, including: a) point & area source emission sampling & analysis b) a comprehensive odour assessment c) a comparison of results from those collected & predicted d) a comparison of results from those collected to the impact assessment criteria detailed in Technical Framework - Assessment & Management of Odour from Stationary Sources in NSW & Technical Notes: Assessment & Management of Odour from Stationary Sources in NSW e) details of any complaints relating to odour impacts Has a report been provided to the DG & DECC with 28 days of completion of testing?</p>	Site observations ECMR 2022 Previous audit reports	No new phases have occurred during the reporting period.	Not triggered	N/A
3.5	<p>Did the program indicate that under design loads & normal operating conditions, that the operation of the project would lead to greater odour impacts than predicted? If so has detail of remedial measures & timetable for implementation been submitted to the DG & is the DECC satisfied with this?</p>	Site observations ECMR 2022 Previous audit reports	No new phases have occurred during the reporting period.	Not triggered	N/A
3.6	<p>Has any new project phases commenced since the last audit? If so, has a revised Human Health Impact Assessment been undertaken within 12 months of commencement of that phase using actual air emission data collected? Was it submitted to the DG & NSW Health within 3 months of commencement of emission data collection?</p>	Site observations ECMR 2022 Previous audit reports	No new phases have occurred during the reporting period.	Not triggered	N/A
Noise Monitoring					
3.7	<p>Has any new project phases commenced since the last audit? If so, has a program to confirm noise emission performance been undertaken including: a) noise monitoring b) methodologies, locations & frequencies for noise monitoring c) identification of monitoring sites at which pre & post-project noise levels can be ascertained d) details of any complaints relating to noise impacts Has a report been provided to the DG & DECC with 28 days of completion of testing?</p>	Site observations ECMR 2022 Previous audit reports	No new phases have occurred during the reporting period.	Not triggered	N/A
3.8	<p>Did the program indicate that under design loads & normal operating conditions, that the operation of the project would lead to greater noise impacts than predicted? If so has detail of remedial measures & timetable for implementation been submitted to the DG & is the DECC satisfied with this?</p>	Site observations ECMR 2022 Previous audit reports	No new phases have occurred during the reporting period.	Not triggered	N/A
Soil Monitoring					
3.10	<p>Is the Soil Monitoring Program being conducted every 12 months including: a) installation of soil moisture probes for daily moisture monitoring b) calibration of probes c) locations of soil sampling d) soil sampling undertaken biannually, before & after irrigation season</p>	Farm and Environmental Monitoring Report 2021/2022	a) soil moisture probes are installed under the irrigation areas and are used to monitor and schedule irrigation. b) The probes are calibrated c) Soil sample locations recorded d) Soil sampling is biannually, before & after irrigation season as specified in the CoA.	Compliant	N/A
3.11	<p>Has the program indicated that effluent irrigation is having an adverse impact on the sustainable use of soils within the irrigation area? If so, what soil amelioration measures have been put in place in consultation with DPI?</p>	Farm and Environmental Monitoring Report 2021/2022 ECMR 2022	The soil and ground water monitoring do not indicate changing soil parameters of an adverse influence.	Compliant	N/A
Water Monitoring					
3.12	<p>Is a surface & groundwater monitoring program being implemented?</p>	Water Management Plan (MPL-TUM-ENV-007-3) June 2021 Farm and Environmental Monitoring Report 2021/2022 ECMR 2022	A surface water and groundwater monitoring program is being implemented.	Compliant	N/A
Hazard Compliance					
3.13	<p>Has a report detailing compliance with conditions 2.32 (Fire Safety Study and Construction Safety Study) & 2.33 (Emergency Plan and Safety Management System) been submitted within 90 days of the commencement of each phase including the following detail: a) dates of study, plan or system completion b) actions taken or proposed to implement recommendations made in studies, plans or systems c) responses to each requirement that may be requested by the DG?</p>	Site observations ECMR 2022 Previous audit reports	No new phases have occurred in the last reporting period. Compliant	Not triggered	N/A
Auditing					
3.14	<p>Refer to DA Condition 16</p>	Previous audit reports	As per 2016 audit. Compliant	Compliant	N/A

3.15	Is an annual odour audit being undertaken including a leak detection & repair program? Have reports been submitted to DECC no later than 1 month after completion of the audit?	Ektimo Emissions Testing Reports September 2021, November 2021, March 2022 Ektimo LDART Testing Report February 2022 ECMR 2022	Biannual odour emissions monitoring reports sighted. Performed in 2021 and 2022. Submitted with ECMR 2022.	Compliant	N/A
3.16	Refer to DA Condition 71 - annual audit required	Refer to DA Condition 71	Compliant	Compliant	N/A
4.1	Refer to CA Condition 4.1	Refer to CA Condition 4.1	Compliant	Compliant	N/A
4.2	Refer to CA Condition 4.2	Refer to CA Condition 4.2	Compliant	Compliant	N/A
4.3	Refer to CA Condition 4.3	Refer to CA Condition 4.3	Compliant	Compliant	N/A
OEMP					
5.3	Has OEMP been updated to detail an environmental framework, practices & procedures to follow during operation? Does the OEMP include: a) identification of all statutory & other obligations including approvals/licences b) description of roles & responsibilities c) environmental policies/principles d) environmental performance review & improvement e) management policies to ensure environmental goals are met f) additional studies listed under condition 5.4 g) monitoring requirements	OEMP Rev 4, 30 August 2021	The OEMP has been modified to include updated targets for environmental programs. a) Section 4 of the OEMP describes and lists relevant approvals and legislation. b) Section 6 of the OEMP describes roles & responsibilities c) Sections 1 and 2 of the OEMP describes the role of the environmental policy and procedures employed by Visy. d) Sections 16-21 describe monitoring, management review and improvement. e) Section 5 of the OEMP describes the objectives targets and management of the OEMP. f) Section 1 and 9 describe the additional air quality action required. The Air Quality Management Plan supports the OEMP in this respect. g) Section 16 of the OEMP and the Management Subplans describes monitoring for the Visy operation.	Compliant	N/A
5.4a	Has the AQMP been updated and does it include: i) identification of major sources of particulate & gaseous air pollutants that may be emitted, both point-source & diffuse emissions, including identification of major components & quantities ii) monitoring iii) procedures for minimisation of gaseous & particulate emissions iv) pro-active & reactive management & response mechanism for particulates, odour & gaseous emissions v) specific procedures for m/ment of generating efficiency & minimisation of GHG per unit of electricity generated vi) procedures aimed at maximising the efficiency of start-up & shut-down vii) provision for regular review of air quality monitoring data & comparison of assumed & predicted viii) plans for regular maintenance to minimise leaks & fugitive emissions	Air Quality Management Plan May 2021 MPL-TUM-ENV-002-3	The AQMP addresses the requirements of: i) In section 4.1 ii) In section 7 iii) In section 6 iv) In section 6 v) In section 6.6 and app J vi) In section 6.3 vii) In section 9 viii) In section 6.3.2 ix) In section 6.4	Compliant	N/A
5.4b)	Has the WMP been updated and does it include: i) options to avoid discharge to ground & ambient waters ii) identification of clean & dirty water areas on site maps iii) details of water management measures for clean & dirty water iv) calculations for water balance for waters generated on site v) details of remedial actions in response to exceedances or performance criteria vi) characteristics of wastewater quality & quantities for reuse vii) specification of wastewater reuse areas shall be specified on maps including contingency land viii) contingency plans in the event irrigation land becomes unavailable ix) specific details regarding wastewater irrigated x) detailed description of measures to mitigate adverse impacts on groundwater	Water Management Plan June 2021 - MPL-TUM-ENV-007-3	The WMP addresses the requirements of: i) In section 4 ii) In section 4 iii) In section 4 iv) In section 4 v) In section 4 vi) In section 4 vii) In section 4 viii) In section 4 ix) In section 4 x) In section 4	Compliant	N/A

<p>5.4c)</p>	<p>Has the NMP been updated and does it include:</p> <ul style="list-style-type: none"> i) procedures to ensure best management practice & best available technology is being considered & implemented ii) procedures to generate suitable for annual environmental auditing iii) identification of all relevant receivers & applicable criteria iv) calculations for water balance for waters generated on site v) procedures for periodic consideration of noise impacts, limits & goals vi) details of management methods & procedures for noise emission control vii) reactive & pro-active strategies for dealing with complaints 	<p>Noise Management Plan (MPL-TUM-ENV-004-3) July 2021</p>	<p>The NMP addresses the requirements of:</p> <ul style="list-style-type: none"> i) in section 1, 2 and 6 ii) in Section 9 iii) In Section 4 iv) N/A v) In Section 8 vi) In Section 6 vii) In Section 6.3 and 8.2 viii) In Section 7 and 8 	<p>Compliant</p>	<p>N/A</p>						
<p>5.4d)</p>	<p>Has the TMP been updated and does it include:</p> <ul style="list-style-type: none"> i) driver education programme ii) best noise practice iii) movement schedule iv) specific measures v) specific measures for minimising noise impacts at identified sensitive areas vi) a system for identifying & ensuring conformance with the Plan vii) a continual improvement process 	<p>Traffic Management Plan (MPL-TUM-ENV-006-3) August 2021</p>	<p>The TMP addresses the requirements of:</p> <ul style="list-style-type: none"> i) in section 6.8 ii) in section 4.3, 4.3 and 6.2 iii) In section 6 iv) In section 6 v) in section 6 and 9 vi) in section 7, 8 and 9 vii) in section 1 and 9 	<p>Compliant</p>	<p>N/A</p>						
<p>5.4e)</p>	<p>Has the SMP been prepared that includes:</p> <ul style="list-style-type: none"> i) detailed identification of soil types & properties within irrigation area ii) a monitoring regime for assessing soil health iii) a detailed description of conditions that would trigger amelioration measures iv) methodologies for soil improvement 	<p>Soil Management Plan (MPL-TUM-ENV-005-3) Sept 2021</p>	<p>The SMP addresses the requirements of:</p> <ul style="list-style-type: none"> i) in section 4 ii) in section 6 iii) in section 3, 6 and 7 iv) in section 4.7 	<p>Compliant</p>	<p>N/A</p>						
<p>EPL 10232</p>											
<p>Administrative Conditions</p>											
<p>A1.1</p>	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1" data-bbox="758 1422 805 1892"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Paper or pulp production</td> <td>Paper or pulp production</td> <td>> 15000 T annual production (2022)</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Paper or pulp production	Paper or pulp production	> 15000 T annual production (2022)	<p>EPL 10232 ECMR 2022 Site observations OEMP</p>	<p>Current production 2021/2022 681,004 t. EPL allows for production over 150,000t.</p>	<p>Compliant</p>	<p>N/A</p>
Scheduled Activity	Fee Based Activity	Scale									
Paper or pulp production	Paper or pulp production	> 15000 T annual production (2022)									
<p>A2.1</p>	<p>The licence applies to the following premises:</p> <table border="1" data-bbox="853 1500 981 1825"> <thead> <tr> <th>Premises Details</th> </tr> </thead> <tbody> <tr> <td>VIBY PULP & PAPER PTY LTD</td> </tr> <tr> <td>438 GADARA ROAD</td> </tr> <tr> <td>TUMAIT</td> </tr> <tr> <td>NW 2729</td> </tr> <tr> <td>PULP AND PAPER MILL SITE, CONSISTING OF LANDS AS LISTED BELOW:</td> </tr> </tbody> </table> <p>Details of Land</p> <ul style="list-style-type: none"> Parcel of Gilmore – Lots 61 & 62 in DP No. 757229 Parcel of Gadara – Lots 4, 6, 7, 8, 9, 12, 14, 19, 42, 46, 47, 48, 49, 50, 57, 61, 62, 63, 64, 76, 83, 84, 91, 92, 93, 94, 95, 96, 97, 105, 106, 107, 110, 116, 117, 118, 119, 120, 130, 131, 132, 133, 134, 135, and 136 in DP No. 757229 Lot 2 in DP No. 598861; Lot 1 and 2 in DP No. 45454; Lot 1 and 2 in DP No. 723, 224, 228, 230, and 235 in DP No. 757252; Lot A (which contains parts of Lots 73, 74, and 78 and the whole of Lot 77 in DP No. 757228) and Lot B in DP No. 364539; Lot D in DP No. 45454; Lot 1 in DP No. 703198; Lot 1 in DP No. 832050; and lots 8 and 9 in DP No. 113036. 	Premises Details	VIBY PULP & PAPER PTY LTD	438 GADARA ROAD	TUMAIT	NW 2729	PULP AND PAPER MILL SITE, CONSISTING OF LANDS AS LISTED BELOW:	<p>MetroMap Images (2022) Site observations</p>	<p>The premises and activities are located as per the EPL.</p>	<p>Compliant</p>	<p>N/A</p>
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438 GADARA ROAD											
TUMAIT											
NW 2729											
PULP AND PAPER MILL SITE, CONSISTING OF LANDS AS LISTED BELOW:											
<p>A3.1</p>	<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. In this condition the reference to "the licence application" includes a reference to: 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 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>Site observations OEMP ECMR 2022</p>	<p>Plant operations generally in accordance with the EPL and Consent</p>	<p>Compliant</p>	<p>N/A</p>						
<p>Discharges to Air & Water & Applications to Land</p>											

<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p>	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p>	<p>ECMR 2022 Annual EPL Return 2022</p>	<p>Monitoring points were generally monitored during the reporting period.</p>	<p>Compliant</p>																																																												
<p>P1.1</p>	<p>Air</p> <table border="1"> <thead> <tr> <th>EPA Identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air Emissions from main recovery boiler</td> <td>Main Stack 1</td> <td>Main Stack 1</td> </tr> <tr> <td>2</td> <td>Air emissions from Power Boiler</td> <td>Emissions from Power Boiler</td> <td>In the discharge duct downstream of the recovery boiler and before the junction with the main stack, 1 m above the discharge duct before the junction with the main stack, 1 m above the discharge duct before the reheat location currently under investigation, monitoring station, southeast of mill.</td> </tr> <tr> <td>3</td> <td>Emissions from Lime Kiln</td> <td>Emissions from Lime Kiln</td> <td>Power Boiler Hopper for fly ash discharge</td> </tr> <tr> <td>4</td> <td>Microbiological monitoring</td> <td></td> <td>Power Boiler Bottom ash discharge point</td> </tr> <tr> <td>5</td> <td>Microbiological monitoring</td> <td></td> <td>Power Boiler Fuel Beds</td> </tr> <tr> <td>6</td> <td>Fly ash quality monitoring</td> <td></td> <td>Power Boiler Discharge duct upstream of the Electro-static Precipitator</td> </tr> <tr> <td>7</td> <td>Bottom ash quality monitoring</td> <td></td> <td>Fines and sand storage bin.</td> </tr> <tr> <td>8</td> <td>Quality monitoring</td> <td></td> <td></td> </tr> <tr> <td>9</td> <td>Air Emission Monitoring</td> <td></td> <td></td> </tr> <tr> <td>10</td> <td>Flashed bed sand quality</td> <td></td> <td></td> </tr> <tr> <td>11</td> <td>Emission from Lime Kiln 2</td> <td></td> <td></td> </tr> <tr> <td>12</td> <td></td> <td></td> <td></td> </tr> <tr> <td>13</td> <td></td> <td></td> <td></td> </tr> <tr> <td>14</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>The following utilisation areas are referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for any application of solids to the utilisation area.</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>	EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Air Emissions from main recovery boiler	Main Stack 1	Main Stack 1	2	Air emissions from Power Boiler	Emissions from Power Boiler	In the discharge duct downstream of the recovery boiler and before the junction with the main stack, 1 m above the discharge duct before the junction with the main stack, 1 m above the discharge duct before the reheat location currently under investigation, monitoring station, southeast of mill.	3	Emissions from Lime Kiln	Emissions from Lime Kiln	Power Boiler Hopper for fly ash discharge	4	Microbiological monitoring		Power Boiler Bottom ash discharge point	5	Microbiological monitoring		Power Boiler Fuel Beds	6	Fly ash quality monitoring		Power Boiler Discharge duct upstream of the Electro-static Precipitator	7	Bottom ash quality monitoring		Fines and sand storage bin.	8	Quality monitoring			9	Air Emission Monitoring			10	Flashed bed sand quality			11	Emission from Lime Kiln 2			12				13				14				<p>ECMR 2022 Annual EPL Return 2022</p>	<p>The discharge points nominated in P1.1 are being monitored as per the EPL.</p>	<p>Compliant</p>
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<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>ECMR 2022 Annual EPL Return 2022</p>	<p>No discharges to Sandy Creek during the reporting period. Some licence exceedances have been reported as per the requirements of the EPL.</p>	<p>Compliant</p>																																																												
<p>L2.1</p>	<p>The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutant in the table below.</p>	<p>EPL Annual Return 2022</p>	<p>Coarse Particle exceedances detailed in the EPL Annual Return 2022. Load limit = 31,000kg, coarse particulate annual load for FY22 was 65,342kg, 28.1% reduction on FY21. Lime kiln performance issues noted as primary cause, as well as the performance of the Power Boiler Electrostatic Precipitator.</p>	<p>Not-compliant Licence fee paid for load exceedance.</p>																																																												
<p>L2.2</p>	<p>The actual load of an assessable pollutant must be calculated in accordance with the relevant load calculation protocol. Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence.</p> <table border="1"> <thead> <tr> <th>Assessable Pollutant</th> <th>Load limit (kg)</th> </tr> </thead> <tbody> <tr> <td>BOD (Enclosed Water)</td> <td>20300.00</td> </tr> <tr> <td>Coarse Particulates (Air)</td> <td>31000.00</td> </tr> <tr> <td>Fine Particulates (Air)</td> <td>100000.00</td> </tr> <tr> <td>Nitrogen (total) (Enclosed Water)</td> <td>4600.00</td> </tr> <tr> <td>Nitrogen Oxides (Air)</td> <td>900000.00</td> </tr> <tr> <td>Phosphorus (total) (Enclosed Water)</td> <td>800.00</td> </tr> <tr> <td>Salt (Enclosed Water)</td> <td>500000.00</td> </tr> <tr> <td>Total suspended solids (Enclosed Water)</td> <td>365000.00</td> </tr> <tr> <td>Zinc (Enclosed Water)</td> <td>180.00</td> </tr> </tbody> </table>	Assessable Pollutant	Load limit (kg)	BOD (Enclosed Water)	20300.00	Coarse Particulates (Air)	31000.00	Fine Particulates (Air)	100000.00	Nitrogen (total) (Enclosed Water)	4600.00	Nitrogen Oxides (Air)	900000.00	Phosphorus (total) (Enclosed Water)	800.00	Salt (Enclosed Water)	500000.00	Total suspended solids (Enclosed Water)	365000.00	Zinc (Enclosed Water)	180.00	<p>Noted</p>	<p>Noted</p>	<p>Not triggered</p>																																								
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L3.1	<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>	EPL Annual Return 2022	Exceedances detailed in annual EPL return incl.: 1) Coarse Particulates at Point 1 & Point 22; 2) Total Solid Particles at Point 4 Lime Kiln; 3) Carbon Monoxide limit at Point 3; 4) Opacity Limit at Point 1 (Stack 1); 5) Nitrogen oxide limit at Point 1 (stack 1); 6) Opacity Limit at Point 22 (Main Stack 2); 7) Total Solid Particles at Point 1 (Stack 1); 8) Nitrogen Oxides Point 2 (Recovery Boiler A).	Not-compliant	A range of maintenance measures were implemented to minimise exceedance.																																																																																																						
L3.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	EPL Annual Return 2022	pH specified in Points 9 and 10 - no discharge from Point 9 during the reporting period and all pH recordings within specified limit at Point 10.	Compliant																																																																																																							
L3.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table.	Noted	Noted	Not triggered																																																																																																							
L3.4	<p>Air Concentration Limits</p> <table border="1" data-bbox="383 1444 678 1870"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile concentration limit</th> <th>Reference conditions</th> <th>Quality correction</th> <th>Averaging period</th> </tr> </thead> <tbody> <tr> <td>Nitrogen Dioxide</td> <td>micrograms per cubic metre</td> <td>400</td> <td></td> <td></td> <td></td> </tr> <tr> <td>TCDD (total)</td> <td>nanograms per cubic metre</td> <td>0.1</td> <td></td> <td></td> <td></td> </tr> <tr> <td>TRSD (see TSD)</td> <td>micrograms per cubic metre</td> <td>3.6</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Chlorine</td> <td>micrograms per cubic metre</td> <td>100</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Total Solid Particles</td> <td>micrograms per cubic metre</td> <td>60</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Carbon monoxide</td> <td>micrograms per cubic metre</td> <td>250</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Total solid particles (stack 1 and 2)</td> <td>micrograms per cubic metre</td> <td>20</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Hydrogen chloride</td> <td>micrograms per cubic metre</td> <td>50</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Total SO₂ and SO₃ (stack 1 and 2)</td> <td>micrograms per cubic metre</td> <td>1</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>Point 1</p> <table border="1" data-bbox="686 1444 853 1870"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile concentration limit</th> <th>Reference conditions</th> <th>Quality correction</th> <th>Averaging period</th> </tr> </thead> <tbody> <tr> <td>Dioxin & Furans</td> <td>nanograms per cubic metre</td> <td>0.1</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Mercury</td> <td>micrograms per cubic metre</td> <td>0.08</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Solid Particles</td> <td>micrograms per cubic metre</td> <td>30</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Carbon monoxide</td> <td>micrograms per cubic metre</td> <td>140</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Hazardous substances</td> <td>micrograms per cubic metre</td> <td>0.6</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Cadmium</td> <td>micrograms per cubic metre</td> <td>0.08</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Quality correction	Averaging period	Nitrogen Dioxide	micrograms per cubic metre	400				TCDD (total)	nanograms per cubic metre	0.1				TRSD (see TSD)	micrograms per cubic metre	3.6				Chlorine	micrograms per cubic metre	100				Total Solid Particles	micrograms per cubic metre	60				Carbon monoxide	micrograms per cubic metre	250				Total solid particles (stack 1 and 2)	micrograms per cubic metre	20				Hydrogen chloride	micrograms per cubic metre	50				Total SO ₂ and SO ₃ (stack 1 and 2)	micrograms per cubic metre	1				Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Quality correction	Averaging period	Dioxin & Furans	nanograms per cubic metre	0.1				Mercury	micrograms per cubic metre	0.08				Solid Particles	micrograms per cubic metre	30				Carbon monoxide	micrograms per cubic metre	140				Hazardous substances	micrograms per cubic metre	0.6				Cadmium	micrograms per cubic metre	0.08				EPL Annual Return 2022	Coarse Particulates, Carbon monoxide, Opacity, Nitrogen oxide and Total Solid Particles limits exceeded at specified points during the reporting period.	Not-compliant	
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L3.5	The limits detailed for Point 3 are only applicable when non-standard fuel is being burnt in the power boiler.	Annual Environmental Compliance and Monitoring Report (ECMR) 2022 Interview M O Donovan	No non-standard fuels have been used this reporting period or since 2008	Not triggered																																																																																																							
L3.6	<p>Water and/or Land Concentration Limits</p> <p>POINT 9</p> <table border="1" data-bbox="949 1456 1157 1870"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>95 percentile concentration limit</th> <th>300M concentration limit</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>milligrams per litre</td> <td></td> <td></td> <td>40</td> </tr> <tr> <td>Nitrogen (total)</td> <td>milligrams per litre</td> <td></td> <td></td> <td>20</td> </tr> <tr> <td>Oil and Grease</td> <td>milligrams per litre</td> <td></td> <td></td> <td>5</td> </tr> <tr> <td>pH</td> <td></td> <td></td> <td></td> <td>6.5 - 9.5</td> </tr> <tr> <td>Phosphorus (total)</td> <td>milligrams per litre</td> <td></td> <td></td> <td>5</td> </tr> <tr> <td>Total suspended solids</td> <td>milligrams per litre</td> <td></td> <td></td> <td>45</td> </tr> </tbody> </table> <p>POINT 10</p> <table border="1" data-bbox="1165 1456 1380 1870"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>95 percentile concentration limit</th> <th>300M concentration limit</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>milligrams per litre</td> <td></td> <td></td> <td>40</td> </tr> <tr> <td>Nitrogen (total)</td> <td>milligrams per litre</td> <td></td> <td></td> <td>20</td> </tr> <tr> <td>Oil and Grease</td> <td>milligrams per litre</td> <td></td> <td></td> <td>5</td> </tr> <tr> <td>pH</td> <td></td> <td></td> <td></td> <td>6.5 - 9.5</td> </tr> <tr> <td>Phosphorus (total)</td> <td>milligrams per litre</td> <td></td> <td></td> <td>5</td> </tr> <tr> <td>Total suspended solids</td> <td>milligrams per litre</td> <td></td> <td></td> <td>45</td> </tr> </tbody> </table>	Pollutant	Units of Measure	95 percentile concentration limit	300M concentration limit	100 percentile concentration limit	BOD	milligrams per litre			40	Nitrogen (total)	milligrams per litre			20	Oil and Grease	milligrams per litre			5	pH				6.5 - 9.5	Phosphorus (total)	milligrams per litre			5	Total suspended solids	milligrams per litre			45	Pollutant	Units of Measure	95 percentile concentration limit	300M concentration limit	100 percentile concentration limit	BOD	milligrams per litre			40	Nitrogen (total)	milligrams per litre			20	Oil and Grease	milligrams per litre			5	pH				6.5 - 9.5	Phosphorus (total)	milligrams per litre			5	Total suspended solids	milligrams per litre			45	EPL Annual Return 2022	No exceedances recorded at Points 9 or 10 during the reporting period.	Compliant																																	
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L3.7	<p>The averaging period applicable for pollutants emitted to the air are as detailed below:</p> <table border="1" data-bbox="175 1411 335 1892"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> </tr> </thead> <tbody> <tr> <td>TSS (as TSS)</td> <td>1 hour</td> </tr> <tr> <td>SO2</td> <td>1 hour</td> </tr> <tr> <td>HCl</td> <td>1 hour</td> </tr> <tr> <td>Nitrogen Oxides (as NO2)</td> <td>1 hour</td> </tr> <tr> <td>Opacity</td> <td>6 minutes</td> </tr> <tr> <td>Solid particles</td> <td>24 hours</td> </tr> <tr> <td>CO</td> <td>1 hour</td> </tr> <tr> <td>All other pollutants</td> <td>As per test methods specified in Clauses 10 and 10.1</td> </tr> </tbody> </table> <p>Reference conditions Unless otherwise specified by the EPA, the reference condition for Points 1.3 and 2.2 are Dry 273 K, 101.3 kPa, 8% O2</p> <p>Point 2 (Recovery Boiler) Reporting levels applicable to air emissions of pollutants measured in the following units and discharged from Point 2 (Recovery Boiler).</p> <table border="1" data-bbox="343 1411 502 1892"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Reporting limit</th> <th>Reference Conditions</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr> <td>NOx (as NO2)</td> <td>mg/m3</td> <td>250</td> <td>dry, 273 K, 101.3 kPa, 8% O2</td> <td>1 hour</td> </tr> <tr> <td>Particulates</td> <td>mg/m3</td> <td>34</td> <td>dry, 273 K, 101.3 kPa, 8% O2</td> <td>as per test method</td> </tr> <tr> <td>Methanol</td> <td>kg/tonne BLS</td> <td>0.012</td> <td>dry, 273 K, 101.3 kPa, 8% O2</td> <td>as per test method</td> </tr> </tbody> </table>	Pollutant	Averaging period	TSS (as TSS)	1 hour	SO2	1 hour	HCl	1 hour	Nitrogen Oxides (as NO2)	1 hour	Opacity	6 minutes	Solid particles	24 hours	CO	1 hour	All other pollutants	As per test methods specified in Clauses 10 and 10.1	Pollutant	Units of measure	Reporting limit	Reference Conditions	Averaging Period	NOx (as NO2)	mg/m3	250	dry, 273 K, 101.3 kPa, 8% O2	1 hour	Particulates	mg/m3	34	dry, 273 K, 101.3 kPa, 8% O2	as per test method	Methanol	kg/tonne BLS	0.012	dry, 273 K, 101.3 kPa, 8% O2	as per test method	Not triggered	Noted	
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L3.8	<p>Point 3 (Power Boiler) Reporting levels applicable to air emissions of pollutants measured in the following units and discharged from Point 3 (Power Boiler).</p> <table border="1" data-bbox="430 1411 590 1892"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Reporting limit</th> <th>Reference Conditions</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr> <td>NOx (as NO2)</td> <td>mg/m3</td> <td>300</td> <td>dry, 273 K, 101.3 kPa, 8% O2</td> <td>1 hour</td> </tr> </tbody> </table>	Pollutant	Units of measure	Reporting limit	Reference Conditions	Averaging Period	NOx (as NO2)	mg/m3	300	dry, 273 K, 101.3 kPa, 8% O2	1 hour	Not-compliant	Noted	EPL Annual Return 2022																												
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L3.9	<p>Point 4 (Lime Klin) Reporting levels applicable to air emissions of pollutants measured in the following units and discharged from Point 4 (Lime Klin).</p> <table border="1" data-bbox="598 1411 758 1892"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Reporting limit</th> <th>Reference Conditions</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr> <td>NOx (as NO2)</td> <td>mg/m3</td> <td>400</td> <td>dry, 273 K, 101.3 kPa, 10% O2</td> <td>1 hour</td> </tr> <tr> <td>Particulates</td> <td>mg/m3</td> <td>23</td> <td>dry, 273 K, 101.3 kPa, 10% O2</td> <td>As per test method</td> </tr> </tbody> </table>	Pollutant	Units of measure	Reporting limit	Reference Conditions	Averaging Period	NOx (as NO2)	mg/m3	400	dry, 273 K, 101.3 kPa, 10% O2	1 hour	Particulates	mg/m3	23	dry, 273 K, 101.3 kPa, 10% O2	As per test method	Compliant	Noted	EPL Annual Return 2022																							
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L3.10	<p>For each discharge point or utilisation area specified below (by a point number), the volume/mass of: a) liquids discharged to water; or b) solids or liquids applied to the area; must not exceed the volume/mass limit specified for that discharge point or area.</p> <table border="1" data-bbox="718 1411 877 1892"> <thead> <tr> <th>Point</th> <th>Unit of Measure</th> <th>Volume/Mass Limit</th> </tr> </thead> <tbody> <tr> <td>9</td> <td>Kilolitres per day</td> <td>5000</td> </tr> <tr> <td>10</td> <td>Kilolitres per day</td> <td>16500</td> </tr> </tbody> </table>	Point	Unit of Measure	Volume/Mass Limit	9	Kilolitres per day	5000	10	Kilolitres per day	16500	Not-compliant	Noted	As per L3.1																													
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L4.1	<p>For each discharge point specified below (by a point number), the volume of emissions to air must not exceed the volume limit specified for that discharge point.</p> <table border="1" data-bbox="869 1411 1029 1892"> <thead> <tr> <th>Point</th> <th>Units of Measure</th> <th>90 percentile volume limit</th> <th>100 percentile volume limit</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Nm3/s</td> <td>90.5</td> <td>100</td> </tr> </tbody> </table>	Point	Units of Measure	90 percentile volume limit	100 percentile volume limit	1	Nm3/s	90.5	100	Compliant	Noted	No exceedances have occurred for discharges from points 9 or 10.																														
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1	Nm3/s	90.5	100																																							
L4.2	<p>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 or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.</p> <p>The following wastes may be received at the premises: (a) waste paper or cardboard for reprocessing into recycled paper; (b) wood residues for pulping; (c) standard fuels; (d) non standard fuels.</p>	Compliant	Noted	The mean flow in cubic metres per second was 80.76 and the peak was 94.31 (limit100).																																						
L5.1	<p>As per L5.1</p>	Compliant	Noted	Recycled paper is accepted on site - cardboard boxes, paper clippings & commons. Wood residues from mills. No waste is being disposed of at the premises.																																						
L5.2	<p>As per L5.1</p>	Compliant	Noted	As per L5.1																																						

<p>L6.1</p> <p>Noise from the premises must not exceed the sound pressure level (noise) limits presented in the table below. Note: the limits represent the sound pressure level (noise) contribution, at the nominated receiver locations in the table.</p> <p>Note: For the purpose of the above condition L6.1 (*) refers to Residences identified in "Visy Pulp and Paper, Proposed Mill Expansion Tumut NSW, final Environmental Assessment" dated January 2007.</p> <table border="1" data-bbox="279 392 406 571"> <thead> <tr> <th>Location</th> <th>Day Lark (15 minutes)</th> <th>Evening Lark (15 minutes)</th> <th>Night Lark (15 minutes)</th> <th>Night Lark (15 minutes)</th> </tr> </thead> <tbody> <tr> <td>"Resident View" (*)</td> <td>40</td> <td>40</td> <td>40</td> <td>45</td> </tr> <tr> <td>"Terns Creek" (*)</td> <td>39</td> <td>39</td> <td>39</td> <td>45</td> </tr> <tr> <td>"Rake" and "Colony" (*)</td> <td>36</td> <td>36</td> <td>36</td> <td>45</td> </tr> <tr> <td>Any other locations</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table>	Location	Day Lark (15 minutes)	Evening Lark (15 minutes)	Night Lark (15 minutes)	Night Lark (15 minutes)	"Resident View" (*)	40	40	40	45	"Terns Creek" (*)	39	39	39	45	"Rake" and "Colony" (*)	36	36	36	45	Any other locations	35	35	35	45	<p>Some estimated site contribution noise readings were below the required limits, however almost all measurements were invalidated due to wind speed or recorded where a negotiated agreement exists. It is noted that negotiated agreements have been completed with all sensitive receivers as of March 2021.</p> <p>Visy altered the monitoring period to February 2022 but was unable to avoid wind speed effects on monitoring. It is noted that site noise was inaudible at various monitoring points and times during the monitoring event.</p>	<p>Compliant</p>	<p>Visy to discuss modifying EPL with EPA to align with Mod 4 (Aug 2020). Negotiated agreements.</p>
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<p>L6.2</p> <p>For the purpose of Condition L6.1 above Day is defined as 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays; Evening is defined as 6pm to 10pm on day day; and Night is defined as 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays.</p> <p>For the purpose of assessment of noise contributions specified under condition L6.1 of this licence, noise from the project shall be:</p> <p>a) assessed at any point within the residential boundary, or at any point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary; and b) subject to the modification factors provided in Section 4 of the New South Wales Industrial Noise Policy (EPA, 2000), where applicable.</p> <p>Notwithstanding, should either</p> <p>i) direct measurement of noise from the project be impractical, the licensee may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the New South Wales Industrial Noise Policy (EPA, 2000)); or ii) it is not possible to access a residence in accordance with the requirements of Point (a) above, measurement may be taken at the property boundary closest to the licensed premise, and the noise impact at the resident determined by calculation.</p>	<p>ECMR 2022 EPL Annual Return 2022</p>	<p>Compliant</p>	<p>N/A</p>																									
<p>L6.3</p> <p>i) direct measurement of noise from the project be impractical, the licensee may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the New South Wales Industrial Noise Policy (EPA, 2000)); or ii) it is not possible to access a residence in accordance with the requirements of Point (a) above, measurement may be taken at the property boundary closest to the licensed premise, and the noise impact at the resident determined by calculation.</p>	<p>ECMR 2022 (Appendix 4)</p>	<p>Compliant</p>	<p>N/A</p>																									
<p>L6.4</p> <p>The noise emission limits identified in Condition L6.1, apply under meteorological conditions of wind speed up to 3 metres per second at 10 metres above ground level, and under temperature inversion conditions (3°C/100m) and wind speeds up to 2m/s.</p>	<p>ECMR 2022 (Appendix 4)</p>	<p>Compliant</p>	<p>N/A</p>																									
<p>L7.1</p> <p>Only the following materials may be used as fuel within the power boiler:- - Standard Fuel; and - Non-standard Fuel.</p>	<p>ECMR 2022 EPL Annual Return 2022</p>	<p>Compliant</p>	<p>A review of fuel used on site against the NSW EPA Eligible Waste Fuels Guideline Dec 2016 is in progress. This may require alteration to the EPL.</p>																									
<p>L7.2</p> <p>The total mass of Non-standard Fuel, excluding the sub-category of "Known Fuel not Requiring Further Testing", used in the Power boiler must not exceed 50% by mass of the total fuel used in the Power Boiler.</p>	<p>ECMR 2022 EPL Annual Return 2022</p>	<p>Not triggered</p>	<p>Non-standard fuels are not used on site.</p>																									
<p>L7.3</p> <p>The minimum exit velocity for Stack 2 when the recovery boiler is operating at or above 70% of the applicable design firing rate is as follows in table below. For the purpose of this condition, tons/day is tonnes dry solids per day for the new recovery boiler.</p> <table border="1" data-bbox="1141 392 1189 571"> <thead> <tr> <th>Phase</th> <th>Equipment discharging to Stack 2</th> <th>Minimum exit velocity m/s @ 100m stack</th> <th>Minimum exit velocity m/s @ 300m stack</th> </tr> </thead> <tbody> <tr> <td>1b</td> <td>New recovery boiler (NREB)</td> <td>18.4</td> <td>22.1</td> </tr> </tbody> </table>	Phase	Equipment discharging to Stack 2	Minimum exit velocity m/s @ 100m stack	Minimum exit velocity m/s @ 300m stack	1b	New recovery boiler (NREB)	18.4	22.1	<p>ECMR 2022 EPL Annual Return 2022</p> <p>Previous audit report (NGH, 2016)</p>	<p>Compliant</p>	<p>Non-standard fuels are not used on site.</p> <p>As per 2016 audit. As of 2016, the current sampling point is located approximately halfway up the stack where the diameter is larger and velocity is lower. The Visy process engineers have used current readings to calculate the velocity at the top where the stack. Based on these calculations the main stack velocity is approximately 24.8m/s which is above 70% of the applicable firing rate.</p>																	
Phase	Equipment discharging to Stack 2	Minimum exit velocity m/s @ 100m stack	Minimum exit velocity m/s @ 300m stack																									
1b	New recovery boiler (NREB)	18.4	22.1																									
<p>Operating Conditions</p>																												
<p>O1.1</p> <p>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.</p>	<p>Site observations Site environmental management plans</p>	<p>Compliant</p>	<p>N/A</p> <p>Materials handling, manufacturing and waste management is planned, monitored and reviewed in a competent and on going manner. Monitoring results indicate that environmental performance is largely compliant and continues to improve were required.</p>																									
<p>O2.1</p> <p>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>	<p>Site observations Site environmental management plans</p>	<p>Compliant</p>	<p>N/A</p> <p>Plant and equipment are maintained using a systematic planned maintenance system and a range of contractors and internal staff. Planned maintenance shutdowns occur annually and unplanned shut downs are used to complete maintenance listed in order of priority.</p>																									

02.2	Equipment used to conduct any monitoring required by this licence must: (a) be properly calibrated to ensure that it measures as accurately as possible; and (b) be maintained and serviced at least as often as often as recommended by the manufacturer or supplier.	ECMR 2022 Ecotech, Group Instrumentation and Lear Siegler calibration reports	Continuous analysing equipment is periodically calibrated & serviced by a dedicated site team and off site contractors.	Compliant	N/A
02.3	Where maintenance, calibration or operation are detailed as part of the standards listed in the licence limit or monitoring sections of this licence, then the maintenance, calibration or operation must be undertaken in accordance with the standard.	ECMR 2022 Ecotech, Group Instrumentation and Lear Siegler calibration reports	Continuous analysing equipment is periodically calibrated & serviced by a dedicated site team and off site contractors.	Compliant	N/A
03.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise dust at the boundary of the premises.	Site observations Interview M O'Donovan	Access roads to the site and most internal access roads are sealed. Unsealed roads are sheeted with hard roadbase. The chip piles and logs are sprayed to reduce dust emissions.	Compliant	N/A
04.1	Effluent resulting from the operation of the premises must only be applied to the defined irrigation area.	ECMR 2022 EPL Annual Return 2022 Farm and Environmental Monitoring Report 2021 - 2022	Farm and Environmental Monitoring Report indicates that 851.52 megalitres of effluent was irrigated over 110.86ha of land via five centre pivots and a soft hose travelling irrigator. It is noted that this is the highest irrigation amount since monitoring began in 2002.	Compliant	N/A
04.2	The quantity of effluent/solids applied to the utilisation area must not exceed the capacity of the area to effectively utilise the effluent/solids. For the purpose of this condition, 'effectively utilise' include the use of the effluent/solids for pasture or crop production, as well as the ability of the soil to absorb the nutrient, salt, hydraulic load and organic material. Effluent application must not occur in a manner that causes surface runoff.	Farm and Environmental Monitoring Report 2021 - 2022	The effluent and solids applied the farm soils are sampled tested and assessed. The soils are similarly assessed. The soils are not showing any elevated parameters relating to the key waste characteristics. Overall soil health is improving over the long-term use of the site.	Compliant	N/A
04.3		Farm and Environmental Monitoring Report 2021 - 2022	Real time soil moisture is monitored to schedule irrigation so soil does not become over saturated. Higher than average rainfall was recorded during 2021/22 and monthly rainfall was above average except August, December, February, March and June. Evaporation for the reporting period was generally lower than average. No runoff reported during the reporting period.	Compliant	N/A
04.4	Spray from effluent application must not drift beyond the boundary of the premises.	Farm and Environmental Monitoring Report 2021 - 2022	No complaints regarding spray drift were recorded. No spray drift was noted by farm manager during irrigation. Centre pivots have coarse nozzle size to minimise small droplets.	Compliant	N/A
04.5	Effluent liquid waste pipelines and fittings must be clearly identified. Standard watertaps, hoses and valves must not be fitted to the pipelines of the effluent system. The effluent system must not be connected to other pipelines. Lockable valves or removable handles must be used where there is public access to the effluent.	Farm and Environmental Monitoring Report 2021 - 2022 Site observations Interview M O'Donovan	Lockable valves are used for the irrigation of effluent. Water pipes and valves are labelled coming from wastewater plant. No significant changes made to fittings or pipelines during the reporting period.	Compliant	N/A
04.6	Public access to any effluent utilisation area must be denied during effluent application and until the effluent application area has dried.	ECMR 2022 Site observations Interview M O'Donovan	The irrigation area is located on private property. The irrigation area is located 6.5 km from the closest centre of population. The irrigation area is fenced and has a lockable gate.	Compliant	N/A
04.7	Adequate notices, warning the public not to drink or otherwise use the treated effluent, must be erected on the site. These notices must be legible English and in any other languages as may be necessary, and must indicate at least that the water in use is "Reclaimed Water - Unfit for Drinking".	ECMR 2022 Site observations Interview M O'Donovan	Public do not have access to site. Signage on access the effluent application area requires replacement.	Compliant	N/A
04.8	Prior to any discharge to Sandy Creek, approval in writing must be obtained from the EPA. This application for discharge must be submitted to the EPA at least two weeks before the requested start date for discharge.	ECMR 2022 EPL Annual Return 2022	No discharges to Sandy creek have occurred in the reporting period.	Compliant	N/A
04.9	The application for discharge must be accompanied by supporting documentation, which includes: (a) Volume of effluent generated, the volume of effluent reused, and the percentage capacity of the holding dam, for both the system as designed and the actual volumes for the previous 12 months. This information is to be presented in both text and graphical form. (b) Details of reasons for the discharge in the event that it is proposed to discharge in a year when the rainfall has been less than the wettest year in ten.	ECMR 2022 EPL Annual Return 2022	No discharges to Sandy creek have occurred in the reporting period.	Compliant	N/A

05.1	After plant commissioning and at least annually thereafter, an odour audit must be carried out. Part of this odour audit must include a leak detection and repair program (LDAR) (as outlined in the MACT Rules) for the entire foul gas and foul condensate collection systems.	ECMR 2022 Ektimo Emissions Testing Reports September 2021, November 2021, March 2022 Ektimo LDAR Testing Report February 2022	Odour monitoring and testing including leak detection are carried out twice a year for the reporting period.	Compliant	N/A																																																												
Monitoring & Recording Conditions																																																																	
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.	ECMR 2022 Annual Return 2022 Farm and Environmental Monitoring Report 2021 - 2022	All monitoring records are maintained electronically and some in hard copy. The results of monitoring are reported in ECMR 2022, the EPL Annual Return 2022 and the Annual Return Submission 2022.	Compliant	N/A																																																												
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.	Internal electronic monitoring records Reports from external specialist consultants	All records are kept electronically and in legible format.	Compliant	N/A																																																												
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	ECMR 2022 (Specifically appendices) Annual Return 2022 Farm and Environmental Monitoring Report 2021 - 2022 Weather data	The records sighted included the: date of sampling, time of sampling, point of sampling and the name of person sampling.	Compliant	N/A																																																												
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	ECMR 2022 EPL Annual Return 2022	Monitoring is being carried out as required. Calibration of the gas analysers at some points require the sensor to be off line for short periods of time each day, this is acceptable.	Compliant																																																													
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M3.3	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.		Farm and Environmental Monitoring Report 2021 - 2022	Specific methodology for various tests are listed throughout the Farm and Environmental Monitoring Report for the reporting period.	Compliant																																								
M4	Division 3 of the Protection of the Environment Operations (General) Regulation 2009 requires that monitoring of actual loads of assessable pollutants listed in L2.2 must be carried out in accordance with the relevant load calculation protocol set out for the fee-based activity classification listed in the Administrative Conditions of this licence.		ECMR 2022 EPL Annual Return 2022	All monitoring data reported in the EPL Annual Return 2022 is used to calculate the load calculations in accordance with the protocol listed in the Administrative Conditions of the EPL.	Compliant	N/A																																							
M5.1	The licensee must collect and analyse meteorological data for the parameters specified for each of the following monitoring point at the frequency and using the method specified for each parameter.		ECMR 2022	Two meteorological monitoring stations commissioned in 2014 are located to the southeast of the mill site (Monitoring Point 8) and on top of the Recovery Boiler B building (Monitoring Point 7)	Compliant	N/A																																							
M5.2	Meteorological monitoring at Point 8	<table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of measure</th> <th>Averaging period</th> <th>Method</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Siting</td> <td>NA</td> <td>NA</td> <td>AM-1</td> <td>NA</td> </tr> <tr> <td>Wind speed @ 10 m</td> <td>ms</td> <td>1 hour</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td>Wind direction @ 10 m</td> <td>°</td> <td>1 hour</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td>Significant Theta @ 2m</td> <td>°</td> <td>1 hour</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td>Temperature @ 2m</td> <td>°K</td> <td>1 hour</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td>Temperature @ Total Solar Radiation @ 10 m</td> <td>°K</td> <td>1 hour</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td></td> <td>Win2</td> <td>1 hour</td> <td>AM-4</td> <td>Continuous</td> </tr> </tbody> </table>	Parameter	Units of measure	Averaging period	Method	Frequency	Siting	NA	NA	AM-1	NA	Wind speed @ 10 m	ms	1 hour	AM-4	Continuous	Wind direction @ 10 m	°	1 hour	AM-4	Continuous	Significant Theta @ 2m	°	1 hour	AM-4	Continuous	Temperature @ 2m	°K	1 hour	AM-4	Continuous	Temperature @ Total Solar Radiation @ 10 m	°K	1 hour	AM-4	Continuous		Win2	1 hour	AM-4	Continuous	As per M5.1	Compliant	
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M6.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.		ECMR 2022 Appendix 9 - Complaints Register Summary Jul 21 - Jun 22	All complaints received are entered into the VAULT complaint system when received. The complaints sighted included the details required in EPL M6. Refer to CA Condition 4.3	Compliant	N/A																																							
M6.2	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.		ECMR 2022 Appendix 9 - Complaints Register Summary Jul 21 - Jun 22	Complaints register observed to contain all required information.	Compliant																																								
M6.3	The record of a complaint must be kept for at least 4 years after the complaint was made.		Visy internal complaints records	Previous records sighted (>4yrs old) in Visy internal electronic systems.	Compliant																																								
M6.4	The record must be produced to any authorised officer of the EPA who asks to see them.		Noted	No results requested this reporting period, monitoring results observed as available.	Not triggered																																								
M7.1	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.		https://www.visy.com.au/env-appv-night-plan/ On site observations Minutes of VCCC meetings	Details are provided on the Visy website. Details on sign at front security gate and the gate is staffed 24/7 Details included in VCCC meetings each quarter	Compliant	N/A																																							
M7.2	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.		https://www.visy.com.au/env-appv-night-plan/	Website states that number is specifically for complaints. Complaints process also clearly communicated through VCCC meetings.	Compliant																																								
M7.3	The preceding two conditions do not apply until 3 months after the date of the issue of this licence.		Noted	Noted	Not triggered																																								
M8.1	For each discharge point or utilisation area specified below, the licensee must monitor: a) the volume of liquids discharged to water or applied to the area; b) the mass of solids applied to the area; c) the mass of pollutants emitted to the air; at the frequency and using the method and units of measure, specified below.	<table border="1"> <thead> <tr> <th>POINT 9</th> <th>Unit of Measure</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Frequency</td> <td>kilolitres per day</td> <td>Flow meter and continuous logger</td> </tr> <tr> <td>Continuous</td> <td></td> <td></td> </tr> <tr> <th>POINT 10</th> <th>Unit of Measure</th> <th>Sampling Method</th> </tr> <tr> <td>Frequency</td> <td>kilolitres per day</td> <td>Other Approved Method 1</td> </tr> <tr> <td>Continuous</td> <td></td> <td></td> </tr> </tbody> </table>	POINT 9	Unit of Measure	Sampling Method	Frequency	kilolitres per day	Flow meter and continuous logger	Continuous			POINT 10	Unit of Measure	Sampling Method	Frequency	kilolitres per day	Other Approved Method 1	Continuous			ECMR 2022 EPL Annual Return 2022 Farm and Environmental Monitoring Report 2021 - 2022	Flow meter monitored for Point 9. Two flow meters used to calculate Point 10 – discharge to wastewater treatment - reclaimed water. Sludge (472kl in 21/22) applied to land is monitored on application and sampled monthly, and the results recorded and reported.	Compliant	N/A																					
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M8.2	Other approved method 1 means the sum of individual flow meters for all the various irrigation areas.		Noted	Noted	Not triggered																																								

<p>The analysis for the concentration of the specified analytes (for non-standard fuel usage) must be conducted in accordance with the documents as detailed below:</p> <p>Wood Analysis</p> <table border="1"> <thead> <tr> <th>Analyte</th> <th>Sample Preparation</th> <th>Analysis Method</th> </tr> </thead> <tbody> <tr><td>Arsenic</td><td>USEPA3052 Acid Digestion</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Beryllium</td><td>AS 1038.8.1 Etchka Ashing</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Cadmium</td><td>USEPA3052 Acid Digestion</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Chromium (VI)</td><td>USEPA3052 Acid Digestion</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Cobalt</td><td>USEPA3052 Acid Digestion</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Lead</td><td>USEPA3052 Acid Digestion</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Manganese</td><td>USEPA3052 Acid Digestion</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Mercury</td><td>USEPA3052 Acid 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</table> <p>ALTERNATIVE METHOD</p> <p>Antimony, Arsenic, Cadmium, Chromium (VI), Cobalt, Lead, Manganese, Mercury, Selenium, Tin, Vanadium and Copper</p> <p>Pty Ash, Bottom Ash and Fluidized Bed Sand Analysis</p> <table border="1"> <thead> <tr> <th>Analyte</th> <th>Sample Preparation</th> <th>Analysis method</th> </tr> </thead> <tbody> <tr><td>Arsenic</td><td>USEPA3052 Acid Digestion</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Beryllium</td><td>AS 1038.8.1 Etchka Ashing</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Cadmium</td><td>USEPA3052 Acid Digestion</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Chromium (VI)</td><td>USEPA3052 Acid Digestion</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Cobalt</td><td>USEPA3052 Acid Digestion</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Lead</td><td>USEPA3052 Acid Digestion</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Manganese</td><td>USEPA3052 Acid Digestion</td><td>USEPA 60108 (ICP-AES)</td></tr> <tr><td>Nickel</td><td>USEPA3052 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<p>M9.1</p>	<p>Annual Return 2022 lodgement confirmation Email to DPE, EPA and SVC 22/11/2022, submitting ECMR 2022</p>	<p>The 2021/22 Annual Return included a statement of compliance, a monitoring and complaints summary and was certified by persons approved by the EPA. In addition it was accompanied by an Annual Return Submission 2021/22. ECMR 2021/22 was emailed to EPA & DPE.</p>	<p>Compliant</p>	<p>N/A</p>	<p>N/A</p>	<p>Compliant</p>																																																																																																
<p>R1.1</p>	<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"> a Statement of Compliance a Monitoring and Complaints Summary a Statement of Compliance - Licence Conditions a Statement of Compliance - Load based Fee a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 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>Annual Return 2022</p>	<p>As per R1.1</p>	<p>Compliant</p>	<p>As per R1.1</p>	<p>Compliant</p>																																																																																																
<p>R1.2</p>	<p>An Annual Return must be prepared in respect of each reporting period, except as provided below. 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>EPL Annual Return 2022</p>	<p>As per R1.1</p>	<p>Compliant</p>	<p>As per R1.1</p>	<p>Compliant</p>																																																																																																

R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	EPL 10232 Site observations	This EPL has not been transferred or revoked during the reporting period.	Not triggered	N/A
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	EPL 10232 Site observations	The EPL has not been surrendered or revoked during the reporting period.	Not triggered	
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	https://apps.epa.nsw.gov.au/prpocooapp/Detail.aspx?instid=10232&id=10232&option=licence&searchchange=licence&range=POEO%20licence&prp=no&status=Issued	Annual return due by 28th August, marked as received 30th August 2022 on EPA website.	Not compliant	N/A
R1.6	Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date. The notification must specify: a) the assessable pollutants for which the actual load could not be calculated; and b) the relevant circumstances that were beyond the control of the licensee.	EPL Annual Return 2022	The pollutant load was calculated for the AR, submission was late but not due to load calculation issues.	Not triggered	N/A
R1.7	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.	EPL Annual Return 2022	Copy of the signed return was available at the time of the audit. Previous annual returns now stored in the EPA portal.	Compliant	N/A
R1.8	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.	EPL Annual Return 2022	Certified by Anthony Joseph Pratt, Director & Robert Andrew Kaye, Company Secretary.	Compliant	N/A
R1.9	In addition to the documents specified in Clause R1.1, the licensee must supply the following documents to the EPA: (a) A copy of the relevant environmental report/s produced in accordance with the requirements of Conditions 1.1 and 1.2 of the Development Consent; and (b) Independent Environmental Audit in accordance with Condition 7.1 of the Development Consent.	Email to DPE, EPA and SVC 22/11/2022, submitting ECMR 2022	The ECMR 2022 emailed to EPA, DPE and SVC concurrently.	Compliant	N/A
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555. 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.	Interview M O'Donovan	No notifications made during the reporting period.	Not triggered	N/A
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	Interview M O'Donovan	No notifications made during the reporting period.	Not triggered	
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.	Interview M O'Donovan	A written request from and EPA officer has not occurred in relation to an event during the reporting period.	Not triggered	N/A
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.	As per R3.1	As per R3.1	Not triggered	

R3.3	<p>The request may require a report which includes any or all of the following information:</p> <ul style="list-style-type: none"> 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. <p>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.</p>	As per R3.1	Not triggered	
R3.4	<p>The licensee must complete and submit to the EPA an Annual Waste Summary Report each financial year.</p>	As per R3.1	Not triggered	
R4.1	<p>The Annual Waste Summary Report must be submitted to the EPA via the online Waste and Resource Reporting Portal (WARRP) within 60 days of the end of the financial year.</p>	Annual Waste Report: Visy Pulp and Paper - 10232, Reporting Period 2021 - 2022	Compliant	
R4.2	<p>The Annual Waste Summary Report must be submitted to the EPA within 60 days of the end of the financial year.</p>	Annual Waste Report: Visy Pulp and Paper - 10232, Reporting Period 2021 - 2022	Compliant	N/A
General Conditions				
G1.1	<p>A copy of this licence must be kept at the premises to which the licence applies.</p>	Site observations	Compliant	N/A
G1.2	<p>The licence must be produced to any authorised officer of the EPA who asks to see it.</p>	Interview M O'Donovan	Not triggered	
G1.3	<p>The licence must be available for inspection by any employee or agent of the licensee working at the premises.</p>	Site observations	Compliant	
Special Conditions				
E1.1	<p>Non-standard fuels must not be burnt unless:</p> <ul style="list-style-type: none"> a) they comply with the sampling, analysis and quality/source requirement of this licence; or b) have been defined as a Known Fuel Not Requiring Further Testing and the supply source has been assessed in accordance with Clause E1.6. <p>The maximum concentration of the following contaminants in any sample of Non-standard Fuel must:-</p> <ul style="list-style-type: none"> i. not exceed 317 mg/kg of hazardous substances calculated in accordance with Equation 1. ii. not exceed 21 mg/kg of Cadmium; iii. not exceed 2 mg/kg of Mercury. <p>Equation 1 is $(0.25b + 1.09As + 1.49Cd + 2.18Pb + 16.16Hg + Be + 1.4Cr + 0.73Co + 1.07Mn + 1.18Ni + Se + 0.82Sn + 0.09V)$</p> <p>Where:</p> <ul style="list-style-type: none"> Sb is the concentration of Antimony in the sample in mg/kg; As is the concentration of Arsenic in the sample in mg/kg; Cd is the concentration of Cadmium in the sample in mg/kg; Pb is the concentration of Lead in the sample in mg/kg; Hg is the concentration of Mercury in the sample in mg/kg; Be is the concentration of Beryllium in the sample in mg/kg; Cr is the concentration of Chromium in the sample in mg/kg; Co is the concentration of Cobalt in the sample in mg/kg; Mn is the concentration of Manganese in the sample in mg/kg; Ni is the concentration of Nickel in the sample in mg/kg; Se is the concentration of Selenium in the sample in mg/kg; Sn is the concentration of Tin in the sample in mg/kg; V is the concentration of Vanadium in the sample in mg/kg; and 	ECMR 2022 Annual Return 2022	No non-standard fuels have been used since 2008	Not triggered
E2.1		As above	Not triggered	

E3.1	<p>a) The frequency and sampling collection methodology for Non-standard Fuels must be in accordance with Sampling Protocol, except as noted below.</p> <p>b) If a Non-standard Fuel source is assessed and classified as a Known Fuel Not Requiring Further Testing, it will not require ongoing sampling and analysis unless requested by the EPA. This request may be made either orally or in writing. If a sample is requested, it must be obtained in accordance with Sampling Protocol.</p> <p>All samples of Non-standard Fuels must be analysed for the following parameters:</p> <ul style="list-style-type: none"> - Hazardous substances - Ash - Copper - Chlorine - Fluorine - Calorific Value <p>b) The first set of samples of Non-standard Fuel from any new supply source must also be analysed for the following contaminants:</p> <ul style="list-style-type: none"> - Organochlorine Pesticides - Organophosphate Pesticides <p>c) The sample preparation and analytic method shall be in accordance with the requirements prior to delivery to Visy Pulp and Paper, Tumut;</p> <p>I. Visual inspection and removal of all visible contaminants or treated pieces of wood; and</p> <p>II. Sampling and analysis in accordance with the Sampling Protocol, and the conditions E1.3 and E1.4 of this licence; and;</p> <p>III. Assessment of suitability for use as a fuel in accordance with the Fuel Specification.</p> <p>b) Any Non-standard Fuel, which fails to meet the Fuel Specification must:-</p> <ul style="list-style-type: none"> I. not be blended with any other fuel; II. not be retested. <p>c) Records must be maintained for a period of not less than four (4) years for each of the following:-</p> <ul style="list-style-type: none"> - the date time and location of each sample of Non-standard Fuel; - the analysis results for each sample taken of Non-standard Fuel; - the approximate volume and mass of each stockpile of Non-standard Fuel sampled; and, - for each stockpile that fails to meet the Fuel Specification, the date and location of its disposal. <p>d) Only Non-standard Fuel that has been sampled, analysed, and complies with the Fuel Specification may be received at the premise.</p>	As above	As above	Not triggered																					
E4.1	<p>a) All Non-standard Fuels must comply with the following quality assurance control requirements prior to delivery to Visy Pulp and Paper, Tumut;</p> <p>I. Visual inspection and removal of all visible contaminants or treated pieces of wood; and</p> <p>II. Sampling and analysis in accordance with the Sampling Protocol, and the conditions E1.3 and E1.4 of this licence; and;</p> <p>III. Assessment of suitability for use as a fuel in accordance with the Fuel Specification.</p> <p>b) Any Non-standard Fuel, which fails to meet the Fuel Specification must:-</p> <ul style="list-style-type: none"> I. not be blended with any other fuel; II. not be retested. <p>c) Records must be maintained for a period of not less than four (4) years for each of the following:-</p> <ul style="list-style-type: none"> - the date time and location of each sample of Non-standard Fuel; - the analysis results for each sample taken of Non-standard Fuel; - the approximate volume and mass of each stockpile of Non-standard Fuel sampled; and, - for each stockpile that fails to meet the Fuel Specification, the date and location of its disposal. <p>d) Only Non-standard Fuel that has been sampled, analysed, and complies with the Fuel Specification may be received at the premise.</p>	As above	As above	Not triggered																					
E5.1	<p>a) The materials that can be considered for classification under the category of Known Fuel Not Requiring Further Testing are detailed in Column 1 of Schedule VF1.</p> <p>b) Unless noted otherwise, each supply source of a fuel intended to be used as a Known Fuel Not Requiring Further Testing must comply with the following requirements before it is used:</p> <ol style="list-style-type: none"> 1. Sampling and analysis of representative samples from three (3) separate batches in accordance with the procedures detailed in this licence; 2. Identification of all contaminants other than those listed in Column 2 of Schedule VF1. For all such contaminants, the licensee must submit supporting scientific information and/or analysis that demonstrates the material will not have a significant impact on the environment if burnt; 3. Details of the quality assurance and quality control procedures that will be implemented to ensure the fuel quality will be maintained; 4. The results of the above assessment and quality systems must be forward to EPA for review; <p>Written confirmation is received from the EPA that a particular source may be used. This consent may be withdrawn at any time in writing by the EPA.</p> <p>c) All fuels classified as Known Fuels Not Requiring Further Testing must comply at all times with the Fuel Specification.</p> <p>d) The licensee may make application to EPA to burn other types of homogenous wood or wood fibre material where there is a low risk of contamination in addition to those already</p>	As above	As above	Not triggered																					
E6.1	<table border="1" data-bbox="1220 1411 1444 1892"> <thead> <tr> <th>Column 1: Description of Fuel</th> <th>Column 2: Quality Requirement</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>Paper machine rejects generated on site</td> <td>Paper machine rejects, including contaminants removed from recycled</td> <td>Assessment under substance E5.1(b) is not required.</td> </tr> <tr> <td>Particle board</td> <td>Uncontaminated and unbleached, except for the adhesive used in manufacture</td> <td></td> </tr> <tr> <td>Medium density fibreboard</td> <td>Uncontaminated and unbleached, except for the adhesive used in manufacture</td> <td></td> </tr> <tr> <td>Plywood</td> <td>Uncontaminated and unbleached, except for the adhesive used in manufacture</td> <td></td> </tr> <tr> <td>Timber decking from manufacturing processes</td> <td>Uncontaminated and unbleached</td> <td></td> </tr> <tr> <td>Manufactured timber product from manufacturing processes</td> <td>Uncontaminated and unbleached, except for the adhesive used in manufacture of the product.</td> <td></td> </tr> </tbody> </table>	Column 1: Description of Fuel	Column 2: Quality Requirement	Comments	Paper machine rejects generated on site	Paper machine rejects, including contaminants removed from recycled	Assessment under substance E5.1(b) is not required.	Particle board	Uncontaminated and unbleached, except for the adhesive used in manufacture		Medium density fibreboard	Uncontaminated and unbleached, except for the adhesive used in manufacture		Plywood	Uncontaminated and unbleached, except for the adhesive used in manufacture		Timber decking from manufacturing processes	Uncontaminated and unbleached		Manufactured timber product from manufacturing processes	Uncontaminated and unbleached, except for the adhesive used in manufacture of the product.		As above	As above	Not triggered
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Timber decking from manufacturing processes	Uncontaminated and unbleached																								
Manufactured timber product from manufacturing processes	Uncontaminated and unbleached, except for the adhesive used in manufacture of the product.																								

E7.1	<p>At the completion of 12 months from the date of commencement of authorisation to burn up to 50% Non-standard Fuels, the licensee must prepare a report that reviews the Fuel Specification, based on the results of the testing requirements as detailed in Clause M2. The report shall establish:</p> <ul style="list-style-type: none"> a) Individual partitioning factors for each Hazardous Substance (i.e. relative percentage in the bottom ash, fly and air emissions); b) Assess the accuracy of the assumptions and simplifications contained in the initial fuel specification; c) Develop a revised fuel specification equation. <p>This report must be submitted to the EPA within 60 days from the end of the initial 12-month operational period detailed above.</p>	As above	As above	Not triggered	
E8.1	<p>Sludge from the Wastewater Treatment Plant may be disposed on site in accordance with the document <i>Wastewater Treatment Plant Sludge Disposal By Land Application On Site - Procedure No: W99-10-10.4-OP-035</i>, dated 20/05/08, or as subsequently amended and approved in writing by the EPA.</p>	<p>Previous audit report (NGH, 2021) Farm and Environmental Monitoring Report 2021 - 2022</p>	<p>Sludge is being disposed of as per procedure and spread on farm. The sludge is sampled and tested monthly. No change in procedure since 2021 reporting period, procedure outline in Section 13.1 of Farm and Environmental Monitoring Report.</p>	Compliant	N/A
Consultation					
NSW EPA					
1	<p>The EPA request that the audit addresses the requirements of any resource recovery orders (orders) and resource recovery exemptions (exemptions) used in relation to waste generated at the premises.</p>	<p>Resource Recovery Order, The Captains Flat alkaline material trial order 2022 The Woodlawn PHR acid mine tailings trial order 2020 Laboratory Analysis Report - Charles Sturt University, DM McMahon 20 May 2022</p>	<p>Waste that is subject to a resource recovery orders (orders) and resource recovery exemptions (exemptions) has been applied to land under the orders and exemptions. The waste has been used at Woodlawn for the rehabilitation of an acid tailings dam and 5028t of dregs & grits; fly and boiler sand (total) was sent to Woodlawn during the reporting period. Results sighted during audit detail compliance with Table 1 of the RRO. Additionally, 489t of dregs & grits, fly and boiler sand (total) was sent to Captains Flat mine rehabilitation site during the reporting period. Lab analysis report provided during the audit shows all tested material within limits specified.</p>	Compliant	N/A