

Opal Botany Mill

DA 05_0120

Annual Environmental Monitoring Report (AEMR)

Operation Compliance Report July 2020 – June 2021

Revision: 01

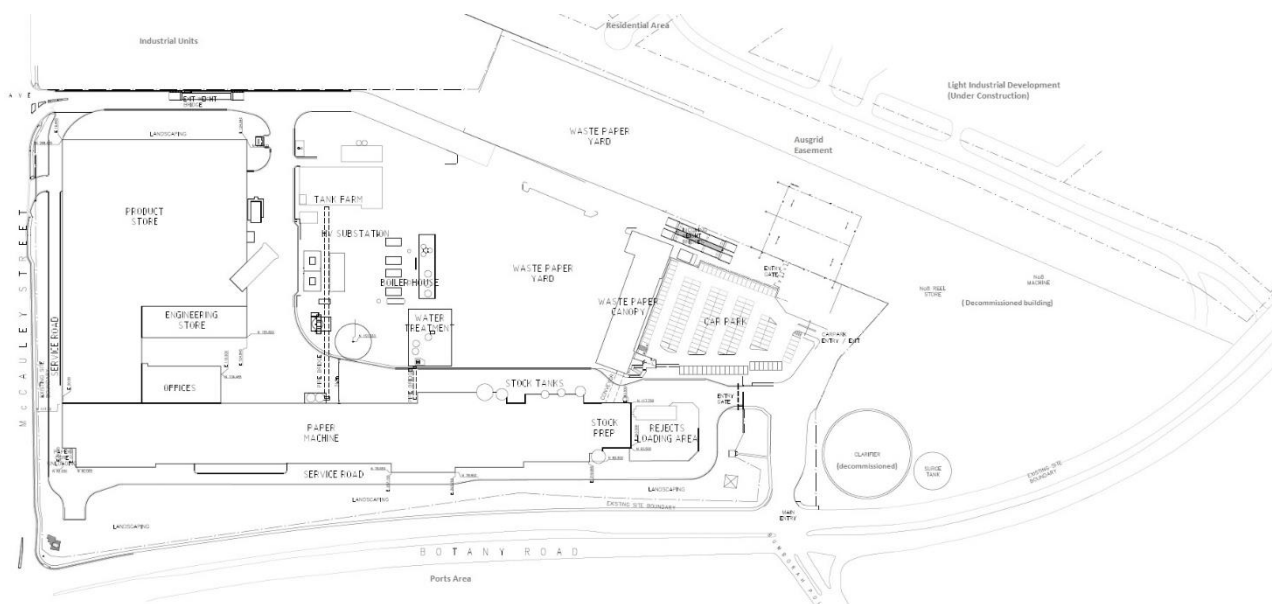
27/10/2021

Prepared by:

Karen Jones

Environment, Testing and Management Systems Manager







1.7. Key Project Personnel

Robert Vukasinovic	General Manager, Operations
Jacob Chretien	General Manager, Technical
Karen Jones	Environment, Testing and Management Systems Manager
Chris Burgess	Health and Safety Manager

2. Operations Summary

2.1. Production Summary

	Approved Limit* (Tonnes)	2019/20	2020/21	2021/21 (forecast)
Packaging Paper	500,000	432,395	422,773	432,000

- Schedule 2, Condition 5, Project 05_0120 (MOD 9)

2.2. Next reporting period

Submission of plans for a new Rejects Waste Handling Facility to increase fibre reuse and reduce waste to landfill and an extension to the existing Finished Product Store building to reduce offsite storage will be submitted early in the 2021/22 reporting period, with construction work on these projects to begin after approval is granted.

3. Previous report actions

See Appendix B for the Action Status Summary table for actions recommended by the 2019 Independent Environment Audit Report.

There were no further actions from previous reports.

4. Compliance Status

4.1. Non-compliance Summary

Total number of non-compliances:3

Schedule 3,1	
Compliance Requirement	The Applicant must ensure that the Development complies with Section 129 of the Protection of the Environment Operations Act, 1997. 'Section 129 of the POEO Act 1997, provides that the Applicant must not cause or permit the emission of any offensive odour from the site, but provides a defence if the emission is identified in the relevant environmental protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.
Details of non-compliance	74 Odour complaints received by mill and EPA during reporting period.
Agency to which non-compliance was reported	Complaints and action discussed with NSW EPA.
Formal enforcement taken by regulators	None taken
Response taken/proposed	The mill has developed an Odour strategy which includes installing gas detectors, modifying biocide addition, tank cleaning and performing odour surveys. In addition, Opal has engaged an odour consultant and will be conducting sampling during the next reporting period to determine the character and concentration of odour from each emission point.

Schedule 3,3	
Compliance Requirement	Except as may be expressly provided in an EPL for the Development, the Applicant must comply with Section 120 of the POEO Act 1997
Details of non-compliance	Six losses to Stormwater as reported in section 4 of this AEMR.
Agency to which non-compliance was reported	All reported to NSW EPA. Some also reported to NSW Department of Planning, Industry and Environment, Sydney Water and Randwick Council.
Formal enforcement taken by regulators	Formal Warning issued by NSW EPA
Response taken/proposed	Responses detailed in Section 4 of this AEMR.

Schedule 3,10F

Compliance Requirement	The Applicant must prepare a Long-term Noise Barrier Plan for the Development. The Plan must: a) identify the Applicant's long-term plan for noise mitigation to nearby sensitive receivers; b) address the planning and implementation strategy for the long-term noise barrier solution, including timeframes for implementation; c) include a procedure for the removal of all or part of the noise barrier if new structures are erected on the site which would perform a suitable noise attenuation function; d) be prepared in consultation with the Department, EPA and Council; and e) be submitted to the Department by 30 June 2021 for Consent by the Secretary.
Details of non-compliance	Long-term Noise Barrier Plan was not submitted by 30 June 2021.
Agency to which non-compliance was reported	Not applicable
Formal enforcement taken by regulators	None taken
Response taken/proposed	The Long-term Noise Barrier Plan is currently being considered as part of the long-term strategy for the site. It would be preferable for any long-term plan to take account of the proposed demolition of the B8 building that is located along the north-eastern boundary of the site (and any subsequent redevelopment of the land on which B8 sits), as this would likely inform the need for (and form of) any noise barrier in that location. However, the timeframe for the demolition of B8 has been impacted by broader site redevelopment discussions with DPIE. As a result, Opal is now expecting to submit the Long-term Noise Barrier Plan to DPIE in early 2022, following discussions with relevant DPIE officers in September / October 2021.

4.2. Noise

Table 1: Project Approval Noise Limits

ID	Location	Day	Evening	Night	Night
		L _{Aeq,15min} , dB(A)	L _{Aeq,15min} , dB(A)	L _{Aeq,15min} , dB(A)	L _{Amax} , dB(A)
R1	Corner of McCauley Street and Australia Avenue	46	45	43	55
R2	Australia Avenue	45	45	43	55
R3	Murrabin Avenue	46	45	43	55
R4	Partanna Avenue	42	41	41	55
R5	Corner of Partanna Avenue and Moorina Avenue	42	42	39	55
R6	Moorina Avenue	43	43	39	55

Noise monitoring, as is required by the Botany Mill Environmental Protection Licence (EPL) was conducted on a quarterly basis during the reporting period in August 2020, November 2020, March 2021, and June 2021. These noise monitoring reports can be found on the Opal website: <https://opalanz.com/sustainability/sustainability-performance/>.

Tables 2 to 6 give the noise levels measured during the reporting period at each monitoring point. Comparisons of results from these monitoring periods with criteria and historical monitoring are shown in Figures 4 – 9. While these historical background noise levels are not directly related to the L_{Aeq} criteria from the EPL, they provide an indication of the change in background environmental noise levels corresponding to the regular noise surveys undertaken for the Botany Mill site. There are no overall trends shown in Figures 4 – 9.

Access to location R3 was withdrawn in February 2020 and is unlikely to be available for future noise surveys. This has been discussed with the EPA.

Table 2: Noise levels measured at monitoring point R1

	$L_{Aeq, 15 \text{ min}}$ dB(A)			L_{90} (10 th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
August 2020	53.8	49.1	48	43.9	43.4	41.5
November 2020	53.3	50.8	48.9	43.6	42.2	41.0
March 2021	51.3	49.4	46.1	42.4	42.8	40.3
June 2021	49.5	47.9	45.8	37.9	43.0	40.8

Table 3: Noise levels measured at monitoring point R2

	$L_{Aeq, 15 \text{ min}}$ dB(A)			L_{90} (10 th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
August 2020	54.8	54.3	53.1	46	50.8	48.1
November 2020	53.5	49.5	49.5	44.2	41.0	40.1
March 2021	53.9	49.6	45.4	42.5	40.5	39.6
June 2021	52.1	52.3	50.6	44.8	47.6	46.1

Table 4: Noise levels measured at monitoring point R4

	$L_{Aeq, 15 \text{ min}}$ dB(A)			L_{90} (10 th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
August 2020	52.9	50.6	50.8	43.9	44.1	43.5
November 2020	56.3	48.8	49.5	43.2	40.9	39.5
March 2021	52.7	49.6	46.3	43.0	43.0	40.0
June 2021	53.8	47.9	46.1	42.0	42.8	41.0

Table 5: Noise levels measured at monitoring point R5

	L _{Aeq} , 15 min dB(A)			L ₉₀ (10 th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
August 2020	53.1	49.5	47.5	40.9	44.6	41.4
November 2020	52.4	52.4	47.2	39.9	43.1	41.4
March 2021	51.1	52.2	49.7	40.5	41.4	38.8
June 2021	52.9	48.7	47.9	40.0	44.1	43.0

Table 6: Noise levels measured at monitoring point R6

	L _{Aeq} , 15 min dB(A)			L ₉₀ (10 th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
August 2020	54.8	48.8	48.1	44.0	45.0	41.3
November 2020	61.9	52.2	49.9	46.9	45.2	41.2
March 2021	51.2	52.2	49.3	43.3	44.0	39.9
June 2021	55.8	48.9	47.4	42.8	44.5	42.5

The June 2021 Quarterly noise monitoring report states:

"Regular quarterly noise monitoring surveys have demonstrated that direct measurement of Opal's contribution to the noise environment is not possible because noise emissions from the site are generally lower than the ambient measured L_{Aeq} noise levels, which masks the actual noise from the Opal site"

And

"The influence from Opal on the local noise environment may be better described using the L_{A90} statistical parameter. This additional parameter has been presented in the results summary to be considered in conjunction with the L_{Aeq} noise level when assessing compliance of the Opal site."

Due to these circumstances, the EPA are investigating whether the EPL can be amended to specify noise monitoring requirements that can provide results more indicative of the Botany Mill operations.

Figure 4: Historical background noise levels at R1

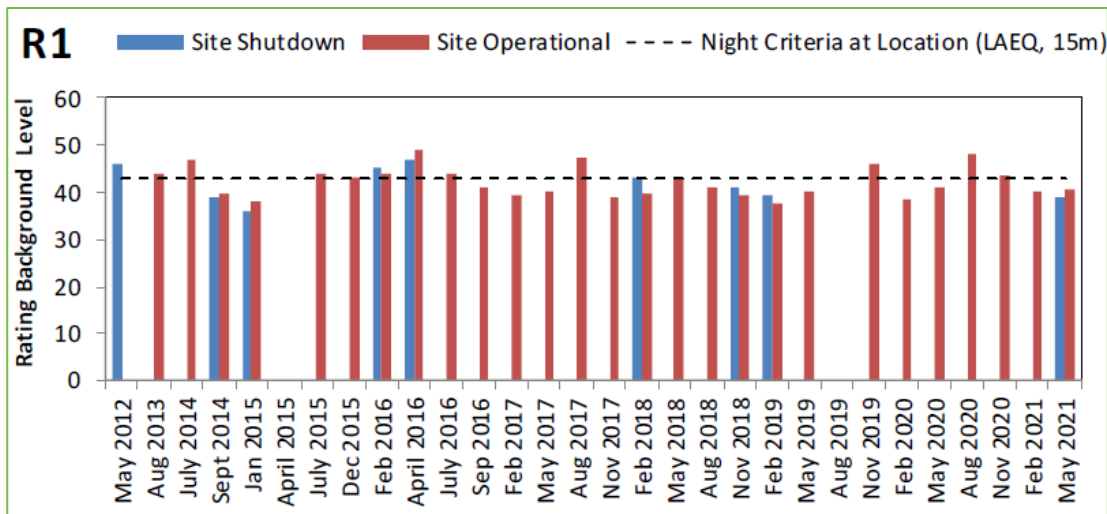


Figure 5: Historical background noise levels at R2

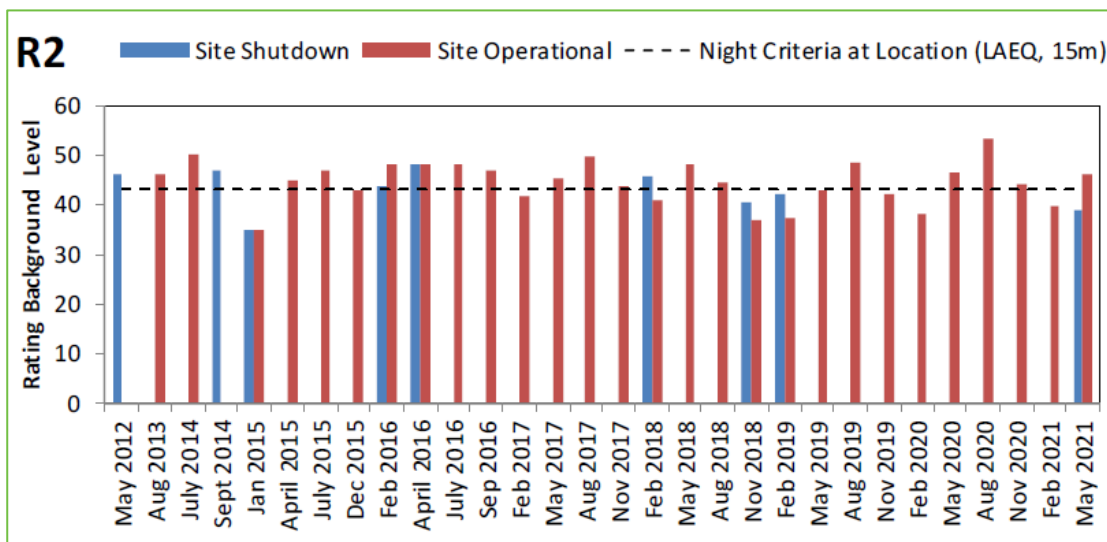


Figure 6: Historical background noise levels at R3

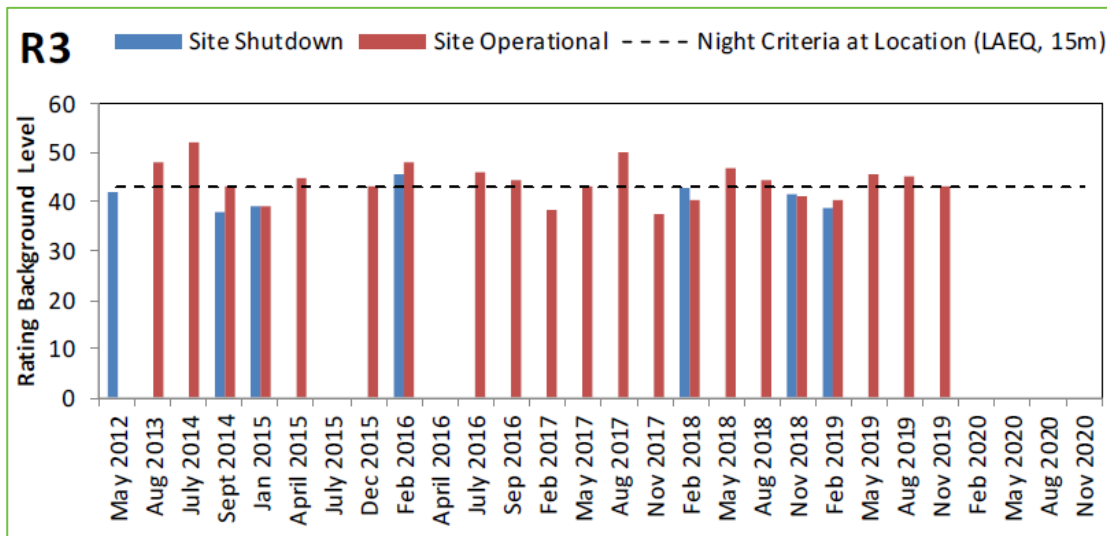


Figure 7: Historical background noise levels at R4

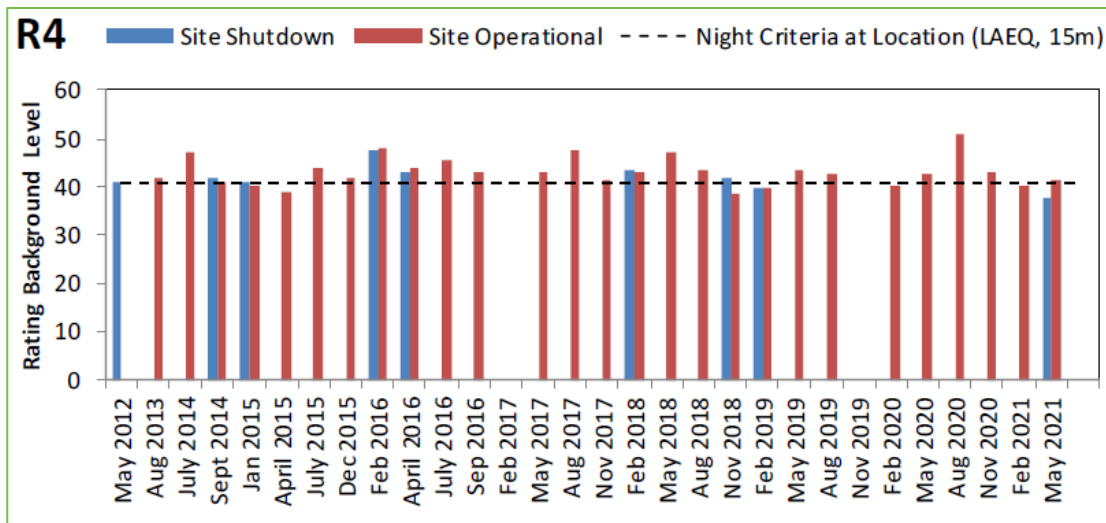


Figure 8: Historical background noise levels at R5

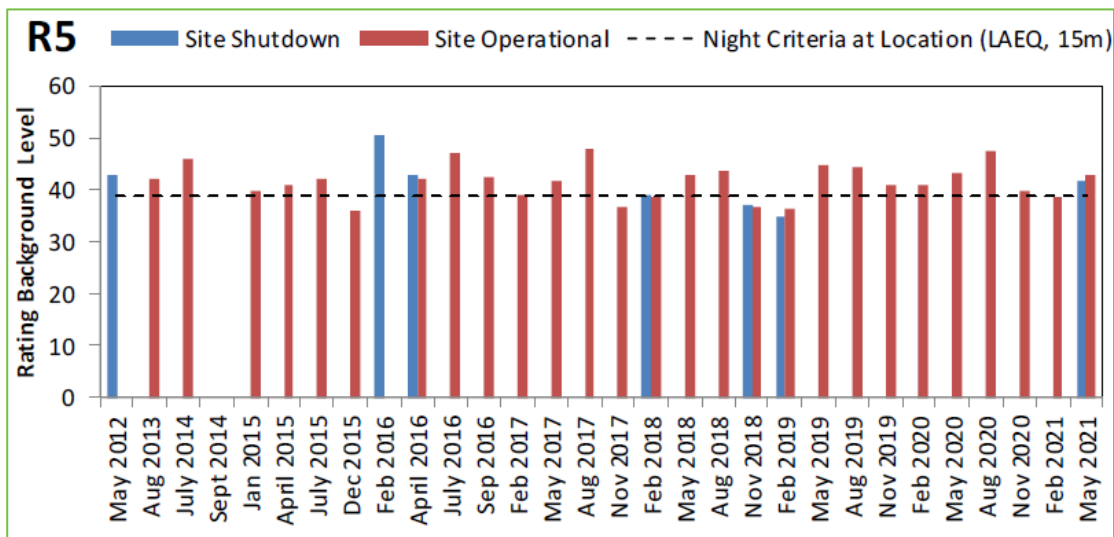
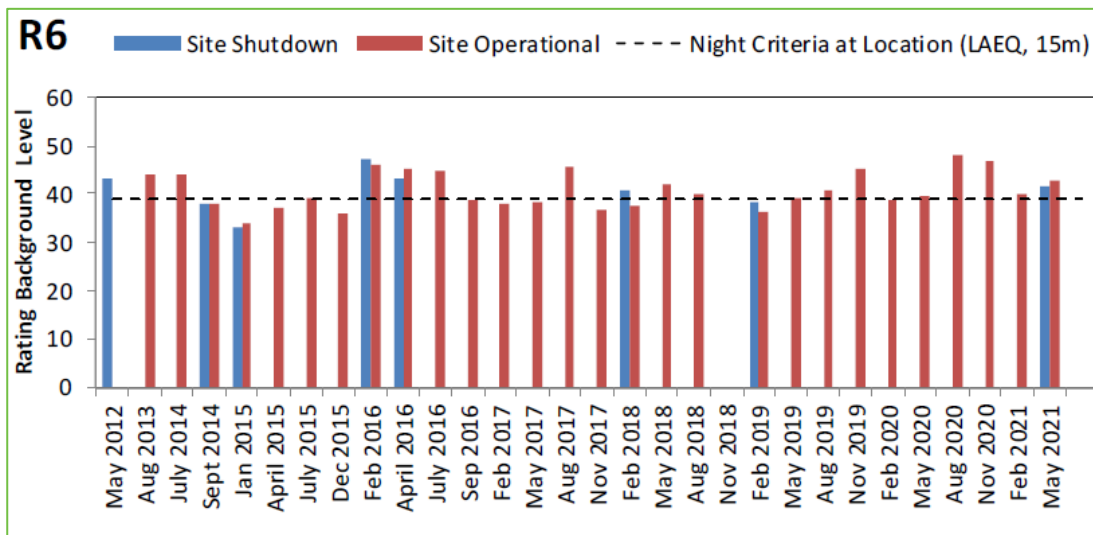


Figure 9: Historical background noise levels at R6



4.3. Water Use

Botany Mill currently has the following water access licence (WAL) and Approval for extracting groundwater:

- WAL 36382
- Approval 10WA118709

Usage for the reporting period was within licence limits. The site used a total of 2,159 ML/yr, where the licence limit is 2,920 ML/yr.

Water use predicted by the EA was up to 12 ML/day of fresh water. During the reporting period the site used an average of 5.9 ML/day of groundwater.

4.4. Sydney Water Trade Waste

Opal Botany Mill holds a Consent to Discharge Industrial Trade Wastewater (the Consent) with Sydney Water for effluent from site. The Consent applies pollutant limits as set out in Table 7. In addition, pH and temperature of the effluent must be within the range 7.0 to 10.0 and below 38 degrees Celsius respectively.

Eight-day effluent testing was performed, with results sent to Sydney Water as per the Consent to Discharge Industrial Trade Wastewater.

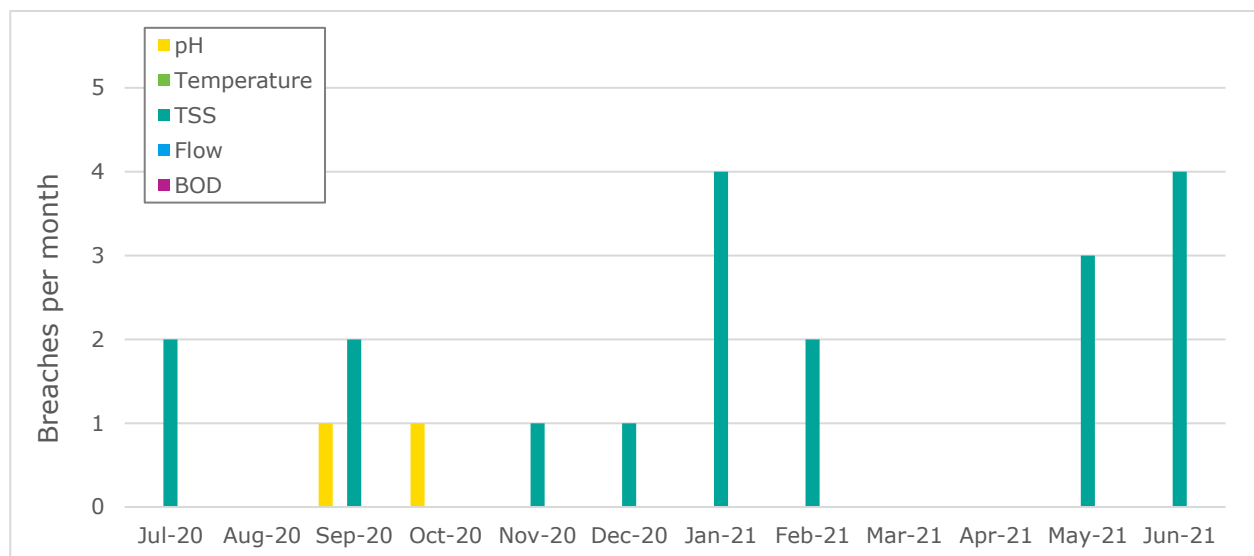
Table 7: Sydney Water Trade Wastewater Consent Pollutant Limits

Substance	Daily Mass (kg/d)	Concentration (mg/L)
Biological Oxygen Demand	34,000	N/A
Suspended Solids (TSS)	3,000	600
Total Dissolved Solids	30,500	10,000
Phenolic Compounds	7	1

An effluent flow of 4.3 ML/day was predicted in the EA for an assumed paper production rate of 345,000 T/year. During the reporting period, the site produced 422,773 Tonnes, and released an average of 6.6 ML/day of effluent to the Sydney Water sewer. The maximum daily discharged allowed by the Consent is 8.95 ML/day.

Nineteen breaches of the Consent for Suspended Solids were recorded during the reporting period, as shown in Figure 10. These were a combination of both concentration and total daily mass breaches. All breaches were reported to Sydney Water.

Figure 10: Breaches of Consent to Discharge Industrial Trade Wastewater in 2020-21



Figures 11 to 14 show historical trends for the relevant pollutant test results. The variation in BOD₅ results is due to the secondary water treatment plant (SWTP) commissioning in 2018, followed by unreliable running of the SWTP in 2019, and recommissioning in 2020 after significant maintenance works.

Figure 11: Biological Oxygen Demand in effluent – historical data

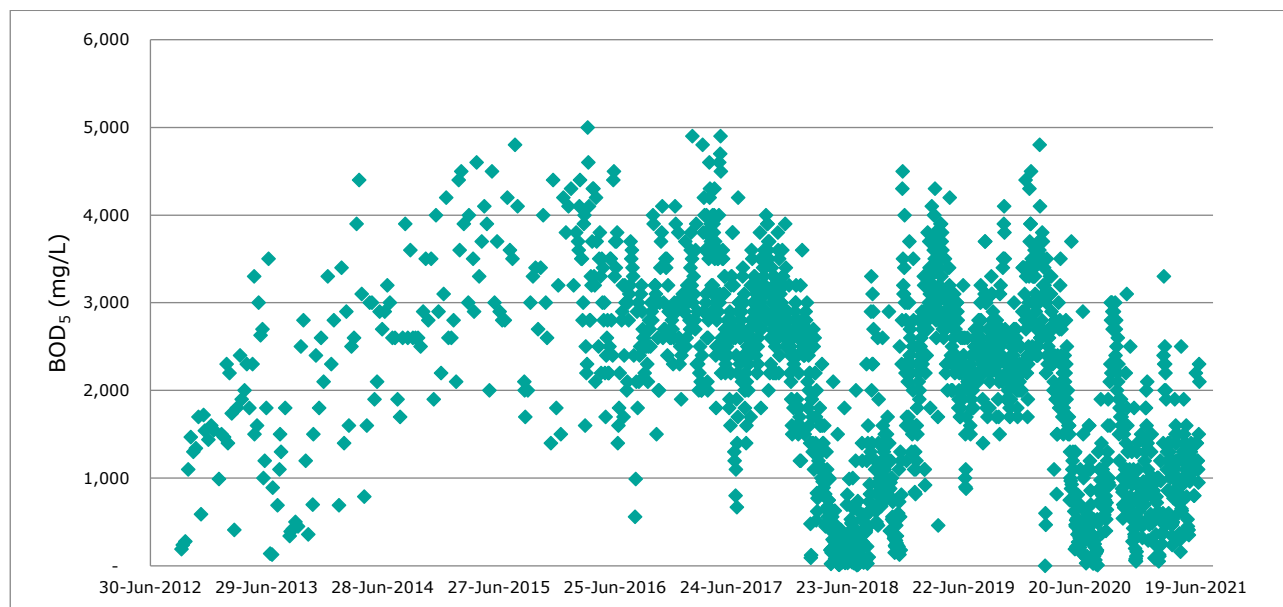


Figure 12: Suspended Solids in effluent – historical data

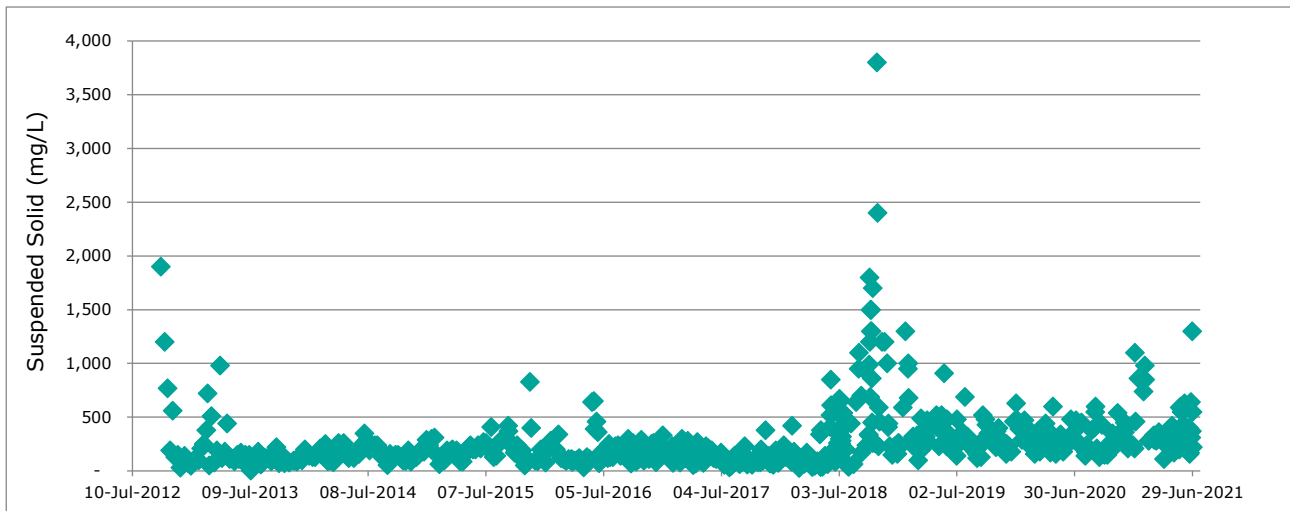


Figure 13: Total Dissolved Solids in effluent – historical data

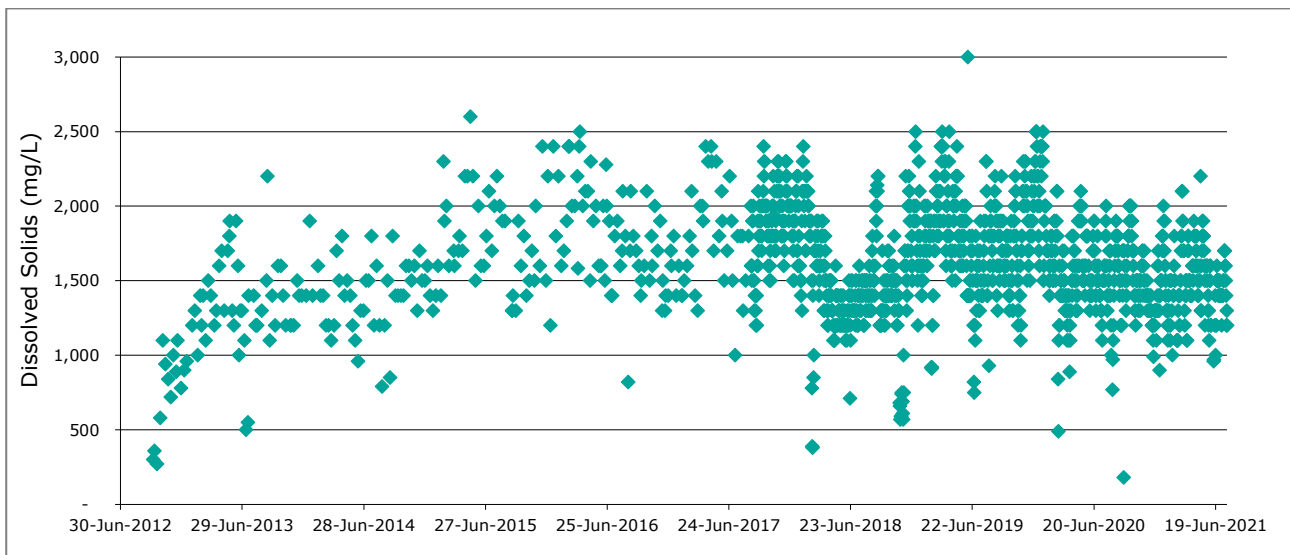
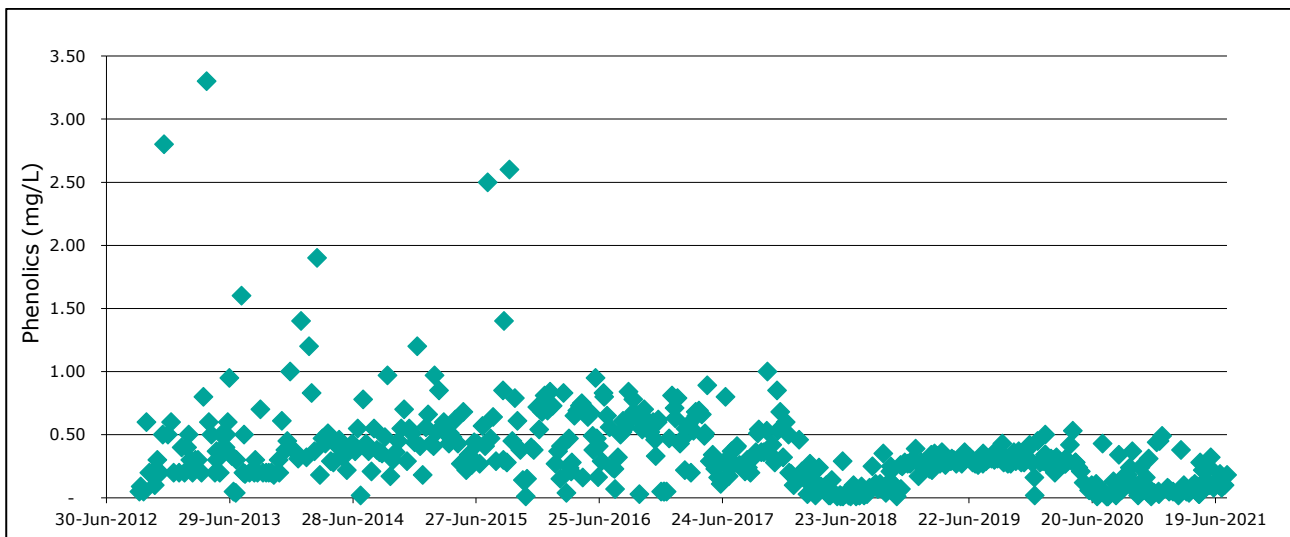


Figure 14: Phenolic compounds in effluent – historical data



4.5. NSW EPA Environmental Protection Licence (EPL)

A Gas Engine Proof of Performance Air Emissions Report was submitted to the EPA in August 2020 detailing emissions testing on the gas engine and its compliance with the standards of concentration as per the EPL. Carbon monoxide (CO) emissions were found to be significantly above the standard of concentration limit, and were unable to be reduced with tuning of the gas engine. As such an oxidation catalyst was installed during the annual maintenance shutdown in June 2021. Subsequent emissions testing has shown that the CO levels are now significantly below the standard of concentration limit.

The Annual return for the Botany Mill EPL 1594 was submitted in March 2021 for the 12-months licence reporting period as required. Eight non-compliances were reported, six of those being within the reporting period of July 2020 - June 2021.

Five of the six non-compliances from this reporting period were reported to the Department of Planning. The sixth was reported to the NSW EPA, and the details are:

Date: 24th September 2020

Summary of non-compliance: Approximately 50 Litres of sewage overflowed from a waste tank in a portable toilet block to a stormwater drain on site.

Cause of the non-compliance: The portable toilet block was brought onto site to reduce the risk of site workers contracting Covid-19 from contractors by separating the facilities they use. A tap on one of the hand-washing basins in the portable toilet block was left partially open, causing the waste tank to fill and overflow.

Action taken to mitigate adverse effects and prevent recurrence: A stormwater drain cover was immediately used over the drain to stop further losses and spill kit material was used to clean up the spill. The tap was turned off inside the toilet block. The toilet block has been permanently plumbed to the site domestic sewerage system.

4.6. Traffic

There has been no significant change in traffic performance for the site since the last reporting period. Current traffic volumes remain well under the vehicle numbers predicted in Modification 9.

Table 8: Predicted and current daily heavy vehicle traffic performance

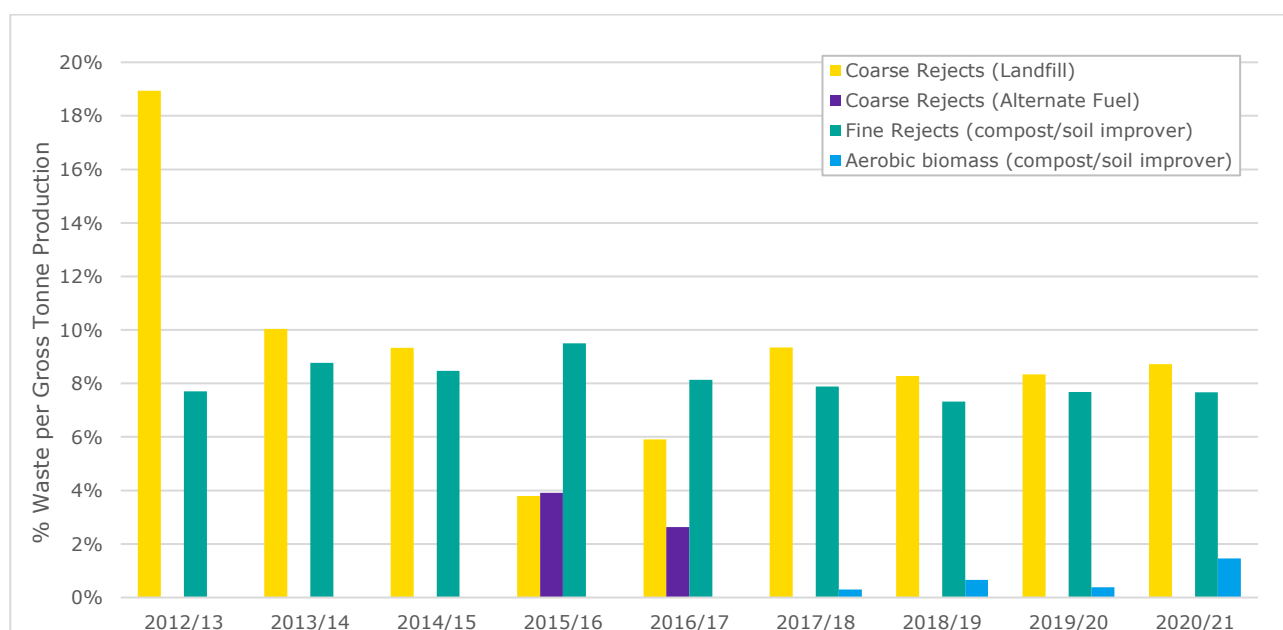
Load type	Predicted Traffic Volumes Mod 9	Current Performance
Wastepaper deliveries	133	111
Starch/Chemical Deliveries	4	3
Finished Product Despatch	62	46
Solid Waste Removal	12	10
General Waste	1	1
Total Heavy Vehicles	212	156

4.7. Waste

Table 9: Comparison of predicted and actual waste generation

Waste stream	Waste Management Plan	Current Performance	Management
Coarse Rejects	47,000 T	37,906 T	Landfill
Fine Rejects	36,000 T	33,346 T	Composting and re-use as soil improver under EPA exemption
Aerobic Biomass	9,000 T	6,369 T	Composting and re-use as soil improver under EPA exemption
Waste Oil	20,000 L	15,300 T	Recycled

Figure 15: Process Waste Trends



4.8. Contaminated Land Management

Inspections were carried out as listed below:

Area	Number of Inspections
Remediated Land Landscaping Inspection	Five
Ground Floor Slab & Exterior Pavement Condition	One
Metals containment cell – Capping integrity & leachate level	Two

All audits have shown good integrity of all remediated land, pavement, slab, and capping. There were no accidental breaches or penetration of the capping requirements. Condensation was observed in the metals containment cell well lid and pipework, but no water in the cell itself. A follow up inspection four months later showed no condensation.

5. Incidents

There were six water pollution incidents during the reporting period. In addition to the action taken to prevent each incident below, the site has also modified the main stormwater drain to prevent any further storm water system spillages leaving the site by capturing water that flows into this drain for re-use on site.

30th July 2020

Summary of Incident: On 30th July 2020, Botany Mill self-reported to the NSW EPA approximately 500 Litres of boiler water and cooling water (bore water or drinking water) that was being drained into a sump overflowed into a stormwater drain on site.

Cause of incident: Boiler 1 was shut down for maintenance, with the water drained from the boiler via the blow down receiver. As the water is drained through the blow down receiver, cooling water is pumped into the receiver to cool the boiler water. The draining of boilers is a regular event, occurring at least monthly, and this method of draining has not resulted in an overflow before. It appears that the thermostat controlling the amount of cooling water may have been reading incorrectly, sending more cooling water than usual into the blow down receiver. The drain valve on the blow down receiver was not listed in the isolation to be open, therefore it was left closed, resulting in the blow down receiver overflowing water from its overflow pipe into the boiler sump. This overflow pipe is a much larger diameter than the drain valve, and therefore discharges at a much higher flow rate than the drain valve. Although the sump pump was working, it could not pump the volume that was being drained to it and overflowed.

Action taken to mitigate adverse effects and prevent recurrence: A drain seal was immediately used to cover the stormwater drain, water draining from the blow down receiver was stopped, and spill kit absorbent snakes used to divert water away from the drain and into another sump. In addition, the cooling water thermostat on the blow down receiver was replaced, the procedure for draining the boilers was updated to include opening the dump valve on the blow down receiver instead of relying on the overflow line and the existing isolation template for isolating the boilers was modified to include opening the blow down receiver drain valve. All appropriate personnel were trained regarding this update.

11th August 2020

Summary of Incident: On 11th August 2020, Botany Mill self-reported to the NSW EPA approximately 50 to 100 Litres of treated process effluent overflowed a sump into two stormwater drains.

Cause of incident: The paper machine was offline due to a hardware failure. The opportunity to clean out the effluent buffer tank was being taken while the paper machine was offline, so in preparation for this it was being emptied via the effluent discharge line to the sewer (trade waste). The flow from the return tanks pumps into the same effluent discharge line as the effluent buffer tank. The return tank flow was very small compared to the higher effluent buffer tank flow, and as it was at a lower pressure, the return tank pumps could not pump against the effluent discharge line, and instead backed up and overflowed the return tanks. These return tanks overflow to the boiler sump, which then overflowed to stormwater. The boiler sump pumps were working at the time (confirmed by a visual check) however they could not pump out the same volume that was flowing into it.

Action taken to mitigate adverse effects and prevent recurrence: Drain covers were immediately deployed over the stormwater drains, and spill kit material employed to divert the overflow to a process sump. A vacuum truck was used on the day to clean out the stormwater drains after the incident. In addition, a speed hump has been installed to redirect water into a nearby sump instead of going to the stormwater drain.

14th August 2020

Summary of Incident: on 14th August 2020, Botany Mill self-reported to the NSW EPA approximately 50 to 100 Litres of treated process effluent overflowed a sump into a stormwater drain.

Cause of incident: The paper machine and site were re-starting after a long breakdown period. The effluent buffer tank was at high level due to the start-up, requiring a high flow to be discharged to sewer via the effluent discharge line. The flow from the return tanks pumps into the same effluent discharge line as the effluent buffer tank. The return tank flow was very small compared to the higher effluent buffer tank flow, and as it was at a lower pressure, the return tank pumps could not pump against the effluent discharge

line, and instead backed up and overflowed the return tanks. These return tanks then overflowed the boiler sump, which overflowed to a stormwater drain. The overflow of the secondary water treatment plant return tanks was the cause of the loss of water to stormwater.

Action taken to mitigate adverse effects and prevent recurrence: Drain covers were immediately deployed over the stormwater drains. In addition, control logic was installed to increase the return tank pump pressure so that it can overcome the pressure in the main effluent line. Further control logic was installed to stop the flow to the effluent discharge line from the effluent buffer tank if the return tank level gets to 90%. If the return tank level gets to 100% the inflow to the water treatment plant will be stopped. Covers were left on the stormwater drains until the stormwater capture system was installed.

24th September 2020

Summary of incident: On 24th September 2020, Botany Mill self-reported to the NSW EPA approximately 50 Litres of sewage overflowed from a waste tank in a portable toilet block to a stormwater drain on site.

Cause of incident: The portable toilet block was brought onto site to reduce the risk of site workers contracting Covid-19 from contractors by separating the facilities they use. A tap on one of the hand-washing basins in the portable toilet block was left partially open, causing the waste tank to fill and overflow.

Action taken to mitigate adverse effects and prevent recurrence: A stormwater drain cover was immediately used over the drain to stop further losses and spill kit material was used to clean up the spill. The tap was turned off inside the toilet block. The toilet block has been permanently plumbed to the site domestic sewerage system.

4th February 2021

Summary of incident: On 4th February 2021, Botany Mill self-reported to the NSW EPA the rupture of an offsite effluent line that transports mill process effluent to the Sydney Water sewer, causing this process effluent to spill into the adjacent stormwater channel. The incident occurred where the Opal effluent line runs along the Sydney Water stormwater easement behind 46 Raymond Avenue, Matraville. This stormwater channel is dammed at the Opal property "Long Dam", where the captured water is pumped back to the Botany Mill site and used. Bore water is also pumped into this channel from Opal bores in Maroubra, where it is captured in "Long Dam" for use on the Botany Mill site. The incident was also reported to Sydney Water and Randwick Council. Randwick Council use the water from Long Dam for the irrigation of Purcell Park, so the notification was to ensure no irrigation was done on the park using the contaminated water.

Cause of the incident: The failure was caused by corrosion of the elbow of the submerged cast steel effluent pipe. This was first noticed due to poor bore water quality in Long Dam at approximately 11:30am on Thursday 4th February 2021 and the ruptured pipe was found at around 12:30pm. Looking at bore water quality trends, it is likely that the pipe ruptured on Tuesday 2nd February 2021, possibly around 9:30am.

The volume of effluent released to the stormwater channel is unknown, however most of the effluent would have been contained in Long Dam as the level in Long Dam is set below 100% to ensure no bore water is lost to Botany Bay.

Action taken to mitigate adverse effects and prevent recurrence: Several actions were taken immediately, and in the days following the incident.

Once the ruptured line was discovered, the level of Long Dam was further lowered to ensure no discharges of water from Long Dam and the stormwater channel into Botany Bay. The effluent pump pressure was lowered to minimise the leak so that the pipe wasn't overflowing. All water was pumped back to Botany Mill for reuse in the mill processes.

On the afternoon of February 4th layers of fluted material along with geotech fabric were laid over the pipe. Sandbags were placed around the pipework and 0.6m³ of concrete was laid to cover the hole in pipe.

On Friday morning the damaged pipe was replaced with heavy duty PVC inserted into pipeline and cemented in to seal it.

The turbidity of the water in Long Dam returned to normal levels on Saturday 6th February 2021.

Aeration and rubbish clean-up of Long Dam was also conducted over three days from Monday 8th February 2021.

On Wednesday 10th February the temporary PVC pipework was replaced with blue heavy duty polyurethane pipe for a permanent fix.

The site currently has a project investigating the best way of re-running this aging pipework asset to reduce the risk of a recurrence of this incident. Local domestic sewer lines are not large enough to accept the mill effluent flowrate, hence the need to run a dedicated line directly to the main Sydney Water sewer line.

5th February 2021

Summary of incident: On 5th February 2021, Botany Mill self-reported the loss of process water to stormwater for approximately half an hour to the NSW EPA. As there is no direct measurement on how much water flowed into the stormwater drain, it is estimated that over the half hour 2000 litres of process water could have been lost.

Cause of the incident: The loss to stormwater was caused by the flooding of the Paper Machine basement bund, resulting in water flowing outside the building via a closed roller door into a roadway drain.

The site was starting up after a repair due to the offsite effluent line rupture (see incident dated 4th February 2021). Due to this repair, the effluent flow from the site was restricted to 50% capacity. A combination of the effluent restriction, site water imbalance and change to the heaviest grade of paper being produced exacerbated the water imbalance, causing the building basement to flood.

Action taken to mitigate adverse effects and prevent recurrence: Spill kit booms were placed along the concrete hump inside the roller door where the water was escaping. Bales of paper were immediately deployed to cover the stormwater drains to stop the flow into them. The production process was immediately stopped.

The Stormwater Management Procedure has been modified to give direction to the Shift Crews as to when the water level in the basement needs to be continually monitored, and then a further step for when the production process needs to be stopped to prevent water escaping the basement bund.

A project for the installation of critical flood level detectors in the paper machine basement has been proposed so that an audible alarm is triggered when the basement is flooded to the point where immediate action is required.

6. Community Contacts

6.1. Complaints

During the reporting period, Botany Mill received one hundred and eight complaints via the mill Environment Hotline and the NSW EPA.

Table 10: Summary of complaints

Nature of complaint	Total Number	No. of complainants
Odour	74	Unknown
Noise	30	Unknown
Waste	0	0
Other	4	4

The majority of the complaints for odour and noise were made during May and June 2021. During these two months twelve noise and fifty odour complaints were registered. Of the seventy-four odour complaints, only thirteen were made directly to the paper mill from four households, the remainder were to the EPA. The mill does not receive the details of complainants that call the EPA, only the street in which they were made from, therefore it is unknown how many complainants made reports regarding odour and noise.

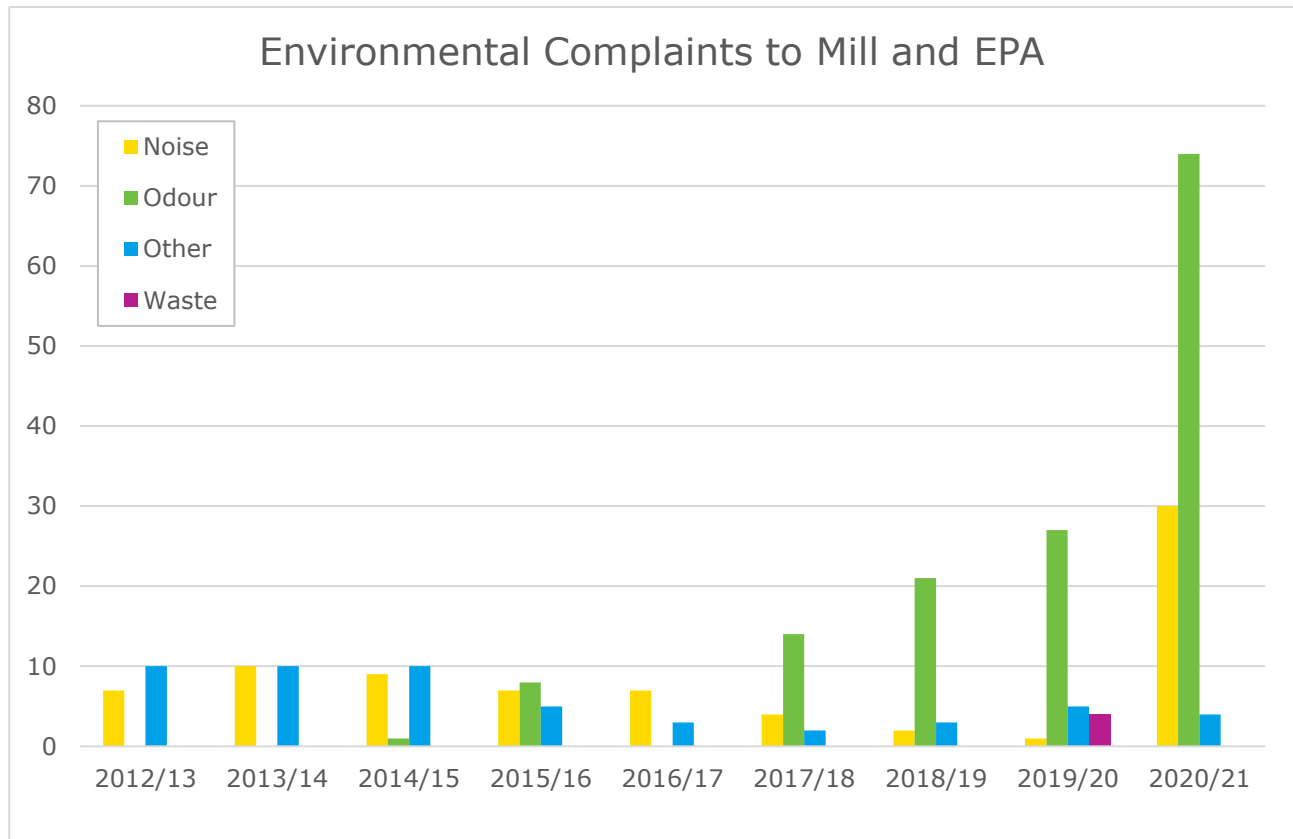
The description of the odour complaints includes wet musty cardboard, chemically sour, plastic, and sulphurous.

The cause of the odour complaints cannot be linked to any process conditions or upsets. Odour surveys conducted during the reporting period did not identify any offensive odours in the residential area related to mill operations. An odour strategy has been developed and discussed with the NSW EPA. An odour consultant has been engaged, and sampling and odour assessment of individual emissions points will be conducted during the next reporting period. This assessment will quantify and characterise the odour at each emission point.

The majority of noise complaints received during the reporting period were related to low frequency, engine idling and rumbling noise. This is most likely related to other operations in the Port Botany area. Some complaints towards the end of the reporting period for a humming or whining noise appear to be related to occasional high output from aeration blowers on site. This matter is still under investigation and operating conditions around these blowers are being closely monitored.

Other complaints were recorded for tree trimming, litter, a traffic incident, and site security.

Figure 16: Environmental Complaints to Mill and EPA



6.2. Community Liaison group meetings and Community Notifications

One Community Liaison Group meeting was held on 29th April 2021.

Due to Covid-19 restrictions, a Community Group Update newsletter was sent out in lieu of the regular Community Liaison group meeting in November 2020.

Information relating to the progression of works, future site plans, production performance and environmental complaints were presented and discussed.

An additional Community Update newsletter was distributed to neighbouring residences in July 2020. The newsletter detailed the following information:

- Sale of the Orora business to Nippon Paper, with the new business named Opal.
- Demolition of the B7 reel store
- Hardstand and warehouse construction
- Production during Covid19
- Environment Hotline contact details

7. Appendices

Appendix A – Compliance Table

Schedule	Unique ID	Compliance Requirement	Development phase	Monitoring methodology	Evidence & comments	Compliance	Details of non-compliance
Schedule 2: Administrative Conditions	Schedule 2, 1	The Applicant must implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction and/or operation of the Development.	Operation	Environmental Management System	Environmental Management System records	Compliant	N/A
	Schedule 2, 2	The Applicant must carry out the Development generally in accordance with the: a) EA b) site plan contained in Appendix A c) submissions report d) statement of commitments; and e) Modification application 05_0120 Mod 2 with supporting documents titled Environmental Assessment Report: B9 Development - New Paper Mill - Revised Modification # 2, Subdivision and Site Layout, 16 February 2010, prepared by SKM and Response to Submissions from Exhibition of Environmental Assessment Report, May 2010, prepared by SKM; f) Modification request 05_0120 Mod 3 with supporting documents titled New Paper Mill Modification Report # 3 - Completion of McCauley Street and Botany Road / McCauley Street Intersection, dated 12 October 2012, and prepared by Sinclair Knight Merz Pty Ltd; g) Modification request 05_0120 Mod 4 with supporting documents titled New Paper Mill Modification Report #4 - completion of McCauley Street and Botany Road / McCauley Street Intersection and use of B-Doubles on McCauley Street, dated January 2013, and prepared by Sinclair Knight Merz Pty Ltd; h) Modification request 05_0120 Mod 5 with supporting documents titled Modification Report - Demolition of B7 and Minor Subdivision, dated November 2014, prepared by Jacobs Group (Australia) Pty Ltd and Submission Report - Modification #5, dated 29 May 2015, prepared by Jacobs Group (Australia) Pty Ltd and statement of commitments for MP 05_0120 Mod 5 contained in Appendix B; and i) conditions of this Consent; j) Modification request 05_0112 MOD 7 and accompanying Environmental Assessment Report, dated August 2016 and prepared by ConsultInfra; k) Modification application 05_0120 MOD 8 and supporting documentation titled Statement of Environmental Effects - Reel Store Demolition & Extension of Noise Barrier, dated 4 June 2018, prepared by Elton Consulting and; B7 Reel Store Demolition & Extension of Noise Barrier Response to DPE Request for Information, dated 1 August 2018, prepared by Elton Consulting; l) Modification application 05_0120 MOD 9 with supporting documentation titled Environmental Assessment Report - Modification #9 - Increase in Paper Mill Maximum Production dated 10 May 2019 and Response to Submissions dated 28 June 2019 both prepared by Elton Consulting.	Operation	As described throughout table.	Works and reports submitted as required.	Compliant	N/A
	Schedule 2, 3	If there is any inconsistency between the plans and documentation referred to in Condition 2 above, the conditions of this Consent, then the most recent documents must prevail to the extent of the inconsistency	Operation	N/A	N/A	Compliant	N/A
	Schedule 2, 4	The Applicant must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this Consent; and b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.	Operation	Requests sent to Opal email address.	Requests for information are fulfilled.	Compliant	N/A
	Schedule 2, 5	The Applicant must ensure that the Development does not produce more than 500,000 tonnes of paper per annum	Operation	Daily/monthly/annual production records.	Annual production has not exceeded 500,000 Tonnes of paper.	Compliant	N/A
	Schedule 2, 6	With the Consent of the Secretary the Applicant may submit any management plan or monitoring program required by this Consent on a progressive basis.	Operation	N/A	N/A	Compliant	N/A
	Schedule 2,13	The Applicant must ensure that all plant and equipment used on the site is maintained and operated in an efficient manner, and in accordance with relevant Australian Standards.	Operation	Maintenance Program in SAP. Statutory requirements for maintenance entered into SAP for automatic reminders. Continuous improvement program for operational efficiency.	Pressure vessel checks, Electrical safety management plan lodged with Ausgrid, maintenance records in SAP.	Compliant	N/A

Schedule 3: Specific Environmental Conditions

Schedule 3,1	The Applicant must ensure that the Development complies with Section 129 of the Protection of the Environment Operations Act, 1997. 'Section 129 of the POEO Act 1997, provides that the Applicant must not cause or permit the emission of any offensive odour from the site, but provides a defence if the emission is identified in the relevant environmental protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	Operation	Monthly odour surveys, water quality testing, complaint recording/monitoring, gas detectors.	Complaints hotline and incident records. Ongoing biocide program for water quality control, odour surveys.	Non-compliant	74 Odour complaints received by mill and EPA during reporting period.																																										
schedule 3,2	During the life of the Development, the Applicant must carry out all reasonable and feasible measures to minimise the dust generated by the Development.	Operation	Complaints monitoring. Construction/demolition work to include dust management strategies.	Any piles of material likely to cause dust is wet down at appropriate frequencies.	Compliant	N/A																																										
Schedule 3,3	Except as may be expressly provided in an EPL for the Development, the Applicant must comply with Section 120 of the POEO Act 1997	Operation	Stormwater sampling.	Stormwater separators installed. Stormwater Management Procedure.	Non-Compliant	Six losses to Stormwater as reported in section 4 of the AEMR.																																										
schedule 3,6	All chemicals, fuels and oils must be stored in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. The bund(s) must be designed and installed in accordance with: a) the requirements of all relevant Australian Standards; and b) the DECC's Environmental Protection Manual Technical Bulletin Bunding and Spill Management.	Operation	Regular bunding audits. Approval system for introduction of new chemicals on site.	Audit reports. Chemical Approval documents.	Compliant	N/A																																										
Schedule 3, 9	The Applicant must prepare and implement a Water Management Plan for the site to the satisfaction of the Secretary. The Plan must: a) be submitted to the Secretary for approval prior to commencement of operation; b) include: * a Water Supply Strategy for the site including a report on the sustainability of groundwater extraction from the Snape Park borefield and the impact on the Botany Sands Aquifer. The strategy should also assess options for alternative water supply, and should be undertaken in consultation with the DWE; * A Stormwater Management Scheme for the site that has been prepared in accordance with the requirements of Sydney Water and Council, and generally in accordance with the Managing Urban Stormwater: Council Handbook (DECC); * a Wastewater System for the site prepared in accordance with the requirements of Sydney Water. The system should include details of discharge rates, wastewater quality and automated controls for monitoring discharges to the Southern and Western Sydney Ocean Outfall Sewer (SWSOOS).	Construction/Operation	As per Operational Trade Waste Management Procedure, Storm water management procedure, monthly bore water flow checks and original documentation submitted prior to commencement of operation.	Ongoing Trade Waste Agreement with Sydney Water, Stormwater quality test results, Groundwater Access Licence for bores.	Compliant	N/A																																										
schedule 3,10	The Applicant must ensure that noise from the operation of the Development does not exceed the noise limits presented in Table 1: <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <caption>Table 1: Project Noise Limits</caption> <thead> <tr> <th>ID</th><th>Location</th><th>Day L_{Day} (15 minutes) dB(A)</th><th>Evening L_{Even} (15 minutes) dB(A)</th><th>Night L_{Night} (15 minutes) dB(A)</th><th>Night L_{Night} dB(A)</th></tr> </thead> <tbody> <tr> <td>R1</td><td>Cnr. McCauley St and Australia Ave</td><td>46</td><td>45</td><td>43</td><td>55</td></tr> <tr> <td>R2</td><td>Australia Avenue</td><td>45</td><td>45</td><td>43</td><td>55</td></tr> <tr> <td>R3</td><td>Murrumbidgee Avenue</td><td>46</td><td>45</td><td>43</td><td>55</td></tr> <tr> <td>R4</td><td>Parramatta Avenue</td><td>42</td><td>41</td><td>41</td><td>55</td></tr> <tr> <td>R5</td><td>Cnr. Parramatta and Moorilla Avenues</td><td>42</td><td>42</td><td>39</td><td>55</td></tr> <tr> <td>R6</td><td>Moorilla Avenue</td><td>43</td><td>43</td><td>39</td><td>55</td></tr> </tbody> </table>	ID	Location	Day L _{Day} (15 minutes) dB(A)	Evening L _{Even} (15 minutes) dB(A)	Night L _{Night} (15 minutes) dB(A)	Night L _{Night} dB(A)	R1	Cnr. McCauley St and Australia Ave	46	45	43	55	R2	Australia Avenue	45	45	43	55	R3	Murrumbidgee Avenue	46	45	43	55	R4	Parramatta Avenue	42	41	41	55	R5	Cnr. Parramatta and Moorilla Avenues	42	42	39	55	R6	Moorilla Avenue	43	43	39	55	Operation	Quarterly noise monitoring. Requirement noted on "Environmental Annual Calendar - Reporting and Monitoring requirements" BW-13022	Quarterly noise monitoring reports. Although noise surveys report noise levels above the Project Noise Limits, ambient noise is regularly greater than the noise limits when Opal is not operating, therefore the noise emissions from Opal are generally lower than the ambient measured L _{day} noise levels.	Compliant	N/A
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Schedule 3, 10F	The Applicant must prepare a Long-term Noise Barrier Plan for the Development. The Plan must: a) identify the Applicant's long-term plan for noise mitigation to nearby sensitive receivers; b) address the planning and implementation strategy for the long-term noise barrier solution, including timeframes for implementation; c) include a procedure for the removal of all or part of the noise barrier if new structures are erected on the site which would perform a suitable noise attenuation function; d) be prepared in consultation with the Department, EPA and Council; and e) be submitted to the Department by 30 June 2021 for Consent by the Secretary.	Construction/Operation	Plan under consideration as site still under development	Plan not yet submitted	Non-compliant	The Long-term Noise Barrier Plan is currently being considered as part of the long-term strategy for the site. It would be preferable for any long-term plan to take account of the proposed demolition of the B8 building that is located along the north eastern boundary of the site (and any subsequent redevelopment of the land on which B8 sits), as this would likely inform the need for (and form of) any noise barrier in that location. However the timeframe for the demolition of B8 has been impacted by broader site redevelopment discussions with DPIE. As a result, Opal is now expecting to submit the Long-term Noise Barrier Plan to DPIE in early 2022, following discussions with relevant DPIE officers in September / October 2021.																																										

	schedule 3,12	The Applicant must ensure that noise from reversing alarms is minimised at all times.	Operation	Monthly noise observations, complaint recording/monitoring.	Reversing alarms replaced with white noise quackers. No noise complaints for reversing alarms.	Compliant	N/A
Schedule 3: Specific Environmental Conditions	Schedule 3, 14A	Within 3 months of the installation of the Stage 2 Noise Barrier, the Applicant must submit a Noise Verification Study to the Secretary. This study must: a) be undertaken by a suitable qualified acoustical expert and in accordance with the NSW Industrial Noise Policy; b) validate the predictions made in the EA and supporting documents for MP 05_0120 Mod 5; c) demonstrate compliance with the noise limits in Table 1 of Conditions 10; and d) describe the contingencies that would be implemented, and the timing for implementation, should non-compliances be detected.	Demolition	Study undertaken by acoustic experts, Hutchison Weller.	Report submitted to Department on 6th October 2020	Not triggered	N/A
	Schedule 3, 14C	Within three months of completion of works associated with 05_0120 MOD 8 the Applicant must submit an updated Noise Verification Study required by Condition 14A. The updated study must: a) be undertaken by a suitable qualified acoustic expert in accordance with the Noise Policy for Industry 2017; b) validate the predictions made in the SEE and supporting documentation for 05_0120 MOD 8; c) demonstrate compliance with the limits in Table 1 of Condition 10; d) describe the additional noise mitigation measures that would be implemented and the timing for implementation should non-compliances be detected; and e) be submitted to the Department for Consent by the Secretary.	Demolition	Study undertaken by acoustic experts, Hutchison Weller.	Report submitted to Department on 6th October 2020	Compliant	N/A
	schedule 3,20	The Applicant must ensure that: a) the internal road network and parking on site complies with the Australian Standards AS 2890.1:2004 and AS 2890.2:2002; b) site related vehicles do not queue on any public roads; c) heavy vehicles are restricted from using McCauley Street north of Raymond Avenue; and d) any changes to site access, including new access points and closure of existing access points are notified to the Secretary prior to commencement of operation.	Operation	McCauley street exit designed for right-hand turn only.	No reports of heavy vehicles using McCauley Street north of Raymond Avenue. No trucks lined up on Botany Road.	Compliant	N/A
	schedule 3,24	The Applicant must prepare and implement a Operational Hazard Plan for the site to the satisfaction of the Secretary. This plan must: a) be prepared by a suitably qualified independent person approved by the Secretary; b) be submitted for Consent prior to the commencement of commissioning; and c) include a : *Emergency Plan that has been prepared in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 1 - Industry Emergency Planning Guidelines and * Safety Management System covering all on-site operations and associated transport activities involving hazardous materials. The Safety Management System must be developed in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 9 - Safety Management.	Operation	Hazard audit completed in 2019. Botany Mill Safety Management System. Botany Mill Emergency Plan	Operational Safety procedures and Emergency Plan submitted to the Secretary as they were prepared. Most recent set of documents submitted prior to the Water treatment plant commissioning.	Compliant	N/A
	Schedule 3, 24E	Twelve months after the commencement of operation of the upgraded WTP and every three years thereafter, or at such intervals as the Secretary may agree, the Applicant must carry out a comprehensive Hazard Audit of the facility as modified and within one month of each audit, submit a report to the Secretary. The audit must be carried out at the Applicant's expense by a qualified person or team, independent of the Development, approved by the Secretary prior to commencement of the audit. The Hazard Audit must be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No 5, "Hazard Audit Guidelines". The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.	Operation	Audit conducted by an independent Auditor approved by the Secretary.	Audit conducted May 2019, the report finalised in July 2019 and Submitted to the Secretary in August 2019 along with an action plan for the implementation of recommendations.	Compliant	N/A
	Schedule 3, 24F	The Applicant must comply with all reasonable requirements of the Secretary in respect of the implementation of any measures arising from the reports submitted in respect of conditions 24A to 24E inclusive, within such time as the Secretary may agree.	Operation	Response submitted to requests as required.	Response submitted to requests as required.	Compliant	N/A
	schedule 3,25	The Applicant must ensure that all waste generated on the site during demolition, construction and operation of the Development is classified in accordance with the DECC's Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes and disposed of to a facility that may lawfully accept the waste.	Operation	Waste Management Plan	Waste Audits	Compliant	N/A
	schedule 3,27	For the life of the Development, the Applicant must: a) Monitor the amount of waste generated by the Development; b) Investigate ways to minimise waste generated by the Development; and c) Implement reasonable and feasible measures to minimise waste generated by the Development to the satisfaction of the Secretary.	Operation	Waste Management Plan	Waste records	Compliant	N/A
	schedule 3,28	The Applicant must prepare and implement an Energy Savings Action plan for the Development to the satisfaction of the Secretary. This plan must be prepared in accordance with the requirements of the DWE and the Guidelines for Energy Savings Action Plans, DEUS 2005, and be submitted to the Secretary for Consent.	Operation	Monthly energy and greenhouse gas monitoring/tracking.	Electricity and gas intensity reductions since commissioning	Compliant	N/A

Schedule 4: Environmental Management and Monitoring	Schedule 4, 29	The Applicant must prepare and implement an Environmental Management Strategy for the Development, the satisfaction of the Secretary. This strategy must be submitted to the Secretary prior to the demolition commencing. The plan must be updated as required throughout construction and must: a) provide the strategic context for environmental management of the Development; b) identify the statutory and other obligations that apply to the Development; c) describe the role, responsibility, authority and accountability of all the key personnel involved in environmental management of the Development; and d) describe the procedure that would be implemented to: * keep the local community and relevant agencies informed about the construction, operation and environmental performance of the Development; * receive, handle, respond to, and record complaints; * resolve any disputes that may arise during the course of the Development; * respond to any non-compliance * report on monitoring results; and * respond to emergencies.	Operation	Environmental Management System	Legal compliance register, community liaison group meetings, community update newsletters, 24-hour complaints hotline, emergency procedure	Compliant	N/A
	Schedule 4, 30	Within one year of the commencement of operations, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission an Independent Environmental Audit for the Development. This audit must: a) be carried out by a suitable qualified, experienced and independent audit team, that contains an odour specialist, noise expert and wastewater specialist, whose appointment has been endorsed by the Secretary; b) assess the environmental performance of the Development; c) assess whether the Development is complying with the conditions of both this Consent and the EPL for the Development; d) review the adequacy of any strategy/plan/programme required under this Consent, and if necessary, recommend measure or actions to improve the environmental performance, and or any strategy/plan/programme required under this Consent.	Operation	Audit conducted in March 2019	Audit conducted March 2019	Compliant	N/A
	Schedule 4, 31	Within two months of completing this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, with a response to any recommendations contained in the audit report.	Operation	N/A		Not triggered	N/A
	Schedule 4, 32	Within three months of submitting the audit report to the Secretary, the Applicant must review and if necessary revise the strategies/plans/programs required under this Consent.	Operation	N/A		Not triggered	N/A
	Schedule 4, 33	Within seven days of detecting an exceedance of the limits/performance criteria in this Consent, or an incident causing (or threatening to cause) material harm to the environment, the Applicant must report the exceedance/incident to the Department, and any relevant agency. The report must: a) describe the date, time and nature of the exceedance/incident; b) identify the cause (or likely cause) of the exceedance/incident; c) describe what action has been taken to date; and d) describe the proposed measures to address the exceedance/incident.	Operation	Incident reporting system at Botany Mill. PIRMP in place.	Requirement to inform Department in PIRMP	Compliant	N/A
	Schedule 4, 34	Within 12 months of this Consent, and annually thereafter, the Applicant must submit an Annual Environmental Monitoring Report (AEMR) to the Secretary and relevant agencies. This report must: a) identify the standards and performance measures that apply to the Development; b) describe works carried out in the last 12 months; c) describe the works that will be carried out in the next 12 months; include a summary of the complaints received during the past year, and compare this to the complaints received in previous years; e) include a summary of monitoring results for the Development during the past year; f) include an analysis of these monitoring results against the relevant: * impact assessment criteria/limits; * monitoring results from previous years; and * predictions in the EA; g) identify any trends in the monitoring results over the life of the Development; h) identify any non-compliance during the previous year; and i) describe what actions were, or are being, taken to ensure compliance.	Operation	Requirement noted on "Environmental Annual Calendar - Reporting and Monitoring requirements" BW-13022	Report submitted by 31st August 2021.	Compliant	N/A
	Schedule 4, 35	Subject to confidentiality, the Applicant must make all documents required under this Consent available on a web site.	Operation	Relevant documents forwarded to Opal communications team for uploading.	Documents available on https://opalan.com/sustainability/sustainability-performance/	Compliant	N/A
	Schedule 4, 36	Within 3 months of: a) an annual independent environmental audit submitted under Condition 30; b) an incident report submitted under Condition 33; or c) the Consent of a modification to the Development Consent, the Applicant must review, and if necessary revise, the strategies, plans and programs required under this Consent to the satisfaction of the Secretary.	Operation	As required	As per Condition 32.	Compliant	N/A

Appendix B – Action Status Table

Table 11: Independent Environment Audit Report Recommendations 2019

Recommendation	Non-compliance (Y/N)	Priority ^a	Response/Actions to be taken	By when	Completed	Action Completed/Comments
1. Revise Stormwater Management Plan and Stormwater Sampling and Testing procedure as recommended in the Golden report, namely: a) inclusion of TRH & BTEXN in stormwater monitoring analytes b) addition of QC samples c) sampling after non-routine events such as fire or large spills.	N	Medium	Stormwater Sampling and Testing Procedure modified to include the recommendations.	1/10/2019	3/07/2019	Revised Stormwater Management Plan and Stormwater Sampling and Testing Procedure as recommended in the Golden report, namely: a) inclusion of TRH & BTEXN in stormwater monitoring analytes b) addition of QC samples c) sampling after non-routine events such as fire or large spills.
2. Include a reference to local guidelines (such as Vic EPA Pub. No.IWRG701) in the Sampling and Testing procedure so that samplers will have access to reliable information on sample storage, holding times and LOR selection, etc. in order to meet required quality parameters.	N	Low	Determine whether these references are required or already covered by the Sampling and Testing procedure.	1/06/2020	14/06/2020	Added reference of NSW EPA document Approved Methods for the sampling and analysis of water pollutants in NSW March 2004 to the Stormwater and Testing procedure.
3. All future stormwater quality monitoring should be undertaken in the context of the recently revised ANZECC & ARMCANZ National Water Quality Management Strategy Guidelines. In particular, the application of specific jurisdictional (NSW) information on the trigger levels to be used for receiving waters. The revised guidelines can be accessed at www.waterquality.gov.au .	N	Medium	Review Guidelines and determine which sections are appropriate for addition to the Stormwater Management Plan and Sampling and Testing Procedure.	1/01/2020	7/01/2020	Checked new guidelines and the only stressor that is stated in the new guidelines that is relevant to Botany Mill is dissolved oxygen. This has been added to the list of pollutants to test by SGS in B/W-13702.
4. Include the clean out of the site's stormwater treatment devices in the preventative maintenance schedule.	N	High	Site stormwater treatment devices included in the preventative maintenance schedule. Close out proof (eg photos or observations/comments) to be added when jobs are complete.	1/08/2019	15/10/2019	Created Register for completing tasks, communicated with contract cleaning company in capturing information on register. Will monitor for effectiveness.
5. Investigate the possibility of having the groundwater meters periodically calibrated to confirm they are correctly measuring the volume of groundwater being pumped (within the acceptable error of the meter being used).	N	Medium	Investigate whether these type of water meters require calibration. Water meters are geared, so may require checking rather than calibration. Put in place preventative maintenance schedule for calibration/checking as appropriate for these instruments.	1/06/2020	30/06/2020	Water meters do not require calibration, but do require "verification" or accuracy testing every 5 years. NOTI entered into SAP for this work.
6. Cease the use of temporary bunding for large chemicals containers once the chemicals store is completed for use.	Y Schedule 3, Condition 6	High	Transfer of chemicals occurring from temporary bunds to chemical store. Temporary bunding will continue to be used for short-term chemical use.	In progress	23/10/2019	IBC's removed from B3 basement. IBC depots MIL7, MIL8 and MIL3 now empty. Photographs taken.
7. Finalise the bunding of the fire pump diesel tanks.	Y Schedule 3, Condition 9(b)	High	Permanent bunding of fire pump diesel tanks in progress with the site project team.	30/06/2020	20/11/2020	Bunding and splash guards installed in fire pump area.
8. Amend the Trade Waste procedure to: a) include cross-references to the Trade Waste permit, in particular Schedule 4; and b) include a specific section on flow meter calibration that includes the requirement for annual calibration and lodgement of the certificate with Sydney Water within one month.	Y Schedule 3, Condition 9(b)	High	Add suggested recommendations to Trade Waste Procedure, and requirement for flow meter calibration to Environmental Compliance Obligations document.	1/08/2019	1/07/2019	Suggested additions were made to the Trade Waste Procedure, and requirement for flow calibration to the Environmental Compliance Obligations document.
9. Orora's acoustic consultants need to include a statement in their noise monitoring reports as to compliance with the L_{Aeq} limit over the period being monitored.	N	Medium	Acoustic consultants have agreed to include compliance statement as recommended in quarterly noise monitoring reports.	1/10/2019	27/03/2019	Comments regarding compliance made by acoustic consultant in August 2019 report and subsequent noise monitoring survey reports.
10. The steam release alarm, and action to confirm release noise, needs to be included in the Operational Noise Management Plan under s.4.1.8 & 4.2, and in s.5 as appropriate. The ONMP should be the primary noise management document for the site and be a 'living' document, to be reviewed and revised as required as conditions change.	N	Low	Add steam release alarm as a noise control device in the Operational Noise Management Plan as recommended.	1/06/2020	11/06/2020	Added into section 6 of the Noise Management Procedure, BP-13767. This has superseded the old Operational Noise Management Plan of 2012. Uploaded to DMS 11/06/2020
11. Develop and implement a documented works program in consultation with the gardening contractor for the maintenance (and if necessary, improvement) of landscape treatments across the site.	N	Low	Investigate whether a documented works program is beneficial with the gardening contractor. Put together a scope of works.	1/07/2020		
12. Continue to develop the integrated management system for the site to include all elements of the 14001 Standard.	N	Medium	On-going. 30% implementation complete.	1/07/2020	30/06/2020	Systems in operation and documentation in SAP DMS
13. Report all exceedances of limits/performance criteria contained within the Project Approval to the Department of Planning and Environment within 7 days.	Y Schedule 4, Condition 33	High	Discuss whether reporting of all odour complaints are required with the Department of Planning compliance team. Implement requirements as discussed.	1/08/2019	18/03/2019	Discussed reporting of odour complaints with Director of Compliance, Ben Harrison on 18th September via phone conference at ASBIS PRG meeting. His response that the Department of planning would not require that all odour complaints be reported to them, unless they were related to an "incident" that required reporting.
14. Include the requirements of Condition 36 - Revision of Strategies in Orora's Audit, and Incident Response procedures, and its Legal and other requirements Compliance Register.	Y Schedule 2 (MOD 6), Condition 11	High	Discuss the requirements for this condition with the Department of Planning compliance team and implement those requirements.	1/08/2019	28/10/2019	Spoke to Alfarid Hussain, Compliance Officer at Dept of Planning. Any changes that are made to strategies, management plans or programs that are required under the DA need to be approved by the post-approvals team. They should be sent to the assessment officer and cc'd to compliance team for approval. This approval means it has been modified "to the satisfaction of the Secretary".
15. Seek clarification from EPA as to the acceptability of having some water quality analytes tested using NATA-certified in-house methods rather than the equivalent APHA method as specified in the EPA's Approved Methods publication.	N	Medium	Discuss recommendation with EPA and implement as required.	1/06/2020	11/06/2020	As stated in the EPL licence variation dated 26/05/2020, the EPA considers that the storm water discharge characterization report met their requirements.
16. Expand the monthly onsite field odour observation to include additional observation locations at the downwind site boundary, with these observations taken before the commencement of the shift by screened office-based staff to avoid the potential for these staff to become desensitised to the odour specific to the plant. A minimum of two Orora office-based staff be successfully screened for sensitivity to odours to AS4323.3.	N	Medium	The addition of 3-monthly formal odour field measurements will be made to the monthly odour walk-around in neighbouring areas. Onsite odour observations are no longer required, as all odour complaints received were related to biogas safety relief valve releases. The Environment Manager will be screened for sensitivity to odours, with consideration to be given to a suitable second person.	18/11/2019	12/10/2020	Monthly residential formal odour field surveys being conducted.
17. Install gas-detection meters (methane and hydrogen sulphide) at the location of the biogas pressure relief valves (if plausible) to provide instantaneous warning to control room staff of these being actuated so that steps to relieve biogas pressure may be initiated promptly.	N	High	Determine whether this is feasible.	1/12/2019	11/12/2019	Gas monitors installed in August 2020.
18. Install a system at the flare to provide instantaneous warning to control room staff of the flare tripping so that re-ignition may be initiated promptly.	N	High	System already has alarms and automatic re-start systems installed. Currently working through issues that occasionally prevent system from re-igniting (eg automated condensate removal).	Complete		System already has alarms and automatic re-start systems installed. Recently installed condensate removal drains and improved shielding from flare pilot light being blown out.
19. Continue to engage with specialist engineers to develop and implement rectification works and biogas management strategies to complete the commissioning of this waste water treatment and co-generation plant. Until these issues are rectified continue to manage the levels of biogas produced to the current low levels that are demonstrated to minimise the risk of notable odorous emissions to air.	Y Schedule 3, Condition 1	High	On-going	1/03/2020	25/08/2020	Many works done on biogas system, including natural gas pilot light on flare, water traps for biogas lines, reducing pressure in biogas line as biogas flow increases. Flare in operation almost 100% of time. Very rare for a flare trip or biogas to escape from PRV's (P> 40mbar)
20. Repeat the field odour survey by the independent consultant when the Secondary WTP and co-generation plant are operating as designed at full capacity to validate that no offensive odours are at and beyond the site boundary.	N	Medium	Will be booked in once S/WTP back at full capacity.	1/07/2020	30/06/2020	Odour field surveys completed by Todoroski Air Sciences 16/06/2020 and 25/08/2020
21. Continue to seek community feedback on the incidence and frequency of offensive odours (if any), and to communicate progress with the Secondary WTP commissioning and operation.	N	High	Each mill newsletter that is sent out has the Environment hotline number on it for feedback. The question regarding any noticeable odours in the area is asked of the community liaison group at each meeting.	Complete		
22. Retain historical wind speed and direction data from Bureau of Meteorology Automatic Weather Station (BOM AWS) at Sydney Airport to inform the investigation of historical or current community complaints of odour dis-amenity.	N	Low	Wind speed and direction data is recorded from the BOM at Sydney Airport or Little Bay and recorded at the complaint time to help with the investigation of each complaint.	Complete		
23. Modify the SHE system to readily provide a summary of incident information for specific environmental pathways (e.g. odour, noise, visual dis-amenity, litter, etc) for information, action and learning.	N	Medium	SHE is a generic company-wide program, with little scope for modifications, however all actions and learnings are recorded in the SHE system. Botany Mill will continue to keep supplementary records for ease of reporting requirements.	Complete		
24. The emission to air testing for combustion gases emitted to air from the biogas fuelled engine be continued after the technical faults with the Secondary WTP and the co-generation plant have been rectified to validate compliance of these emissions with the approval criteria for oxides of nitrogen, carbon monoxide and sulphur dioxide.	Y Schedule 2 (MOD 6), Condition 5	High	Seek advice from biogas engine experts (maintenance and operation) as to settings/conditions that need to be adjusted for compliance to air emissions approval criteria before the biogas engine is re-started. Perform emissions testing as soon as practical once biogas engine is re-started and under steady operation. Adjust biogas engine as needed.	1/04/2019	13/07/2020	Due date extended, as EGSB shut down in October 2019, so no biogas being produced for the biogas engine. Engine restarted in May 2020. Biogas engine experts, Clarke energy, to tune the engine once it is running again to ensure low emissions. Clarke had tuned it to be based on landfill gas plants, with a NO _x limit of 500 mg/Nm ³ . Gas Engine emissions testing completed in June and July 2020. Report sent to NSW EPA.

^aPriority is rated as follows: High - to be completed over the next 3 months; Medium - to be completed over the next 12-18 months; Low - to be completed before the next triennial audit.

Appendix C


Compliance Declaration Form	
Project Name	Construction of a new paper mill at Amcor's Matraville Plant (Project B9)
Project Application Number	05_0120
Description of Project	Construction and Operation of Recycled Paper Mill
Project Address	1891 Botany Road, Matraville
Proponent	Opal Packaging (Previously Orora and Amcor)
Title of Compliance Report	Annual Environmental Monitoring Report – Operational Compliance Report
Date	27 th October 2021

I declare that I have reviewed the contents of the attached Compliance Report and to the best of my knowledge:

- the Compliance Report has been prepared in accordance with all relevant conditions of consent;
- the Compliance Report has been prepared in accordance with the Compliance Reporting Requirements;
- the findings of the Compliance Report are reported truthfully, accurately and completely;
- due diligence and professional judgement have been exercised in preparing the Compliance Report; and
- the Compliance Report is an accurate summary of the compliance status of the development.

Notes:

- Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years' imprisonment or 200 penalty units, or both)

Name of Authorised Reporting Officer	Karen Jones
Title	Environment, Testing & Management Systems Manager
Signature	
Qualification	Bachelor of Engineering, Chemical
Company	Opal Packaging
Company Address	1891 Botany Road, Matraville 2036