

Rooty Hill Distribution Centre

Independent Environmental Audit

Prepared for Holcim (Australia) Pty Ltd | 29 November 2018



Rooty Hill Distribution Centre

Independent Environmental Audit

Prepared for Holcim (Australia) Pty Ltd | 29 November 2018

Ground Floor, Suite 01, 20 Chandos Street
St Leonards, NSW, 2065

T +61 2 9493 9500

F +61 2 9493 9599

E info@emmconsulting.com.au

www.emmconsulting.com.au

Rooty Hill Distribution Centre

Final

Report J17175RP1 | Prepared for Holcim (Australia) Pty Ltd | 29 November 2018

Prepared by	Tania Amanovic	Dr Philip Towler	Approved by	Dr Philip Towler
Position	Environmental Scientist	Associate Director	Position	Associate Director
Signature			Signature	
Date	29/11/18	29/11/18	Date	29/11/18

This report has been prepared in accordance with the brief provided by the client and has relied upon the information collected at the time and under the conditions specified in the report. All findings, conclusions or recommendations contained in the report are based on the aforementioned circumstances. The report is for the use of the client and no responsibility will be taken for its use by other parties. The client may, at its discretion, use the report to inform regulators and the public.

© Reproduction of this report for educational or other non-commercial purposes is authorised without prior written permission from EMM provided the source is fully acknowledged. Reproduction of this report for resale or other commercial purposes is prohibited without EMM's prior written permission.

Document Control

Version	Date	Prepared by	Reviewed by
V1	9/5/18	P. Towler T. Amanovic	P. Towler
V2	29/11/18	P. Towler	-



T +61 (0)2 9493 9500 | F +61 (0)2 9493 9599

Ground Floor | Suite 01 | 20 Chandos Street | St Leonards | New South Wales | 2065 | Australia

www.emmconsulting.com.au

Table of contents

Chapter 1	Introduction	1
1.1	Overview of the operation	1
1.2	Audit objectives	3
1.3	Audit criteria	3
1.4	Audit scope	4
Chapter 2	Audit method	7
2.1	Audit team roles and responsibilities	7
2.1.1	Holcim audit team	7
2.1.2	EMM audit team	7
2.1.3	Independence of the audit team	7
2.2	Approvals and documents audited	7
2.3	Audit activities	9
2.3.1	Inception teleconference	9
2.3.2	Agency consultation	9
2.3.3	Site inspection	9
2.3.4	Interviews	9
2.3.5	Draft report	10
2.3.6	Report finalisation	10
2.3.7	Closing teleconference	10
2.4	Assessment criteria and method of reporting	10
Chapter 3	Audit context	15
3.1	Holcim environmental systems	15
3.2	Site management	15
3.3	Land use	16
3.4	Environmental	16
3.5	Social	16
3.6	RHDC operations	16
Chapter 4	Audit results	25
4.1	Overview	25
4.2	Audit results	25
4.3	Previous (2016) audit results	25
4.4	Stockpiles and concrete batching plant	32
4.4.1	Material handling, stockpiling and load-out	41
4.4.2	Concrete batching plant	41
4.4.3	Impacts	41
4.5	Agency consultation	41

Table of contents *(Cont'd)*

Chapter 5	Audit summary	44
-----------	---------------	----

Appendices

A	Development approval compliance register
B	EPL compliance register
C	Statement of commitments compliance register
D	Previous 2016 audit non-compliances
E	Agency consultation letter example
F	Agency consultation responses

Tables

1.1	Legal description of the site	1
2.1	Compliance assessment criteria	10
2.2	Risk levels of non-compliances	11
3.1	Project summary	17
4.1	Non-compliance summary	26
4.2	Additional recommendations	31
4.3	Approved product storage activities at Rooty Hill Regional Distribution Centre	33
4.4	Summary of agency consultation	41


Figures

1.1	Rooty Hill Distribution Centre site location and layout	2
4.1	Figure 5.1 from original Environmental Assessment (National Environmental Consulting Services 2005)	36
4.2	Figure 5.15 from original Environmental Assessment (National Environmental Consulting Services, 2005)	37
4.3	Figure 3.3 from MOD1 Environmental Assessment (Umwelt 2010)	38
4.4	Figure 3.4 from MOD1 Environmental Assessment (Umwelt 2010)	39
4.5	Figure 1.2 from MOD2 Environmental Assessment (Umwelt 2017)	40

Photographs

3.1	Maintenance shed and bunded oil storage area	17
3.2	View east from conveyor to concrete storage bays and truck loading area	18
3.3	View north from conveyor to concrete storage bays and truck loading area	18
3.4	Stormwater pipe from the concrete batching plant area	19
3.5	Fuel storage to the left and parking for concrete agitator trucks in the distance	19
3.6	The newly constructed concrete batching plant	20
3.7	Concrete agitator truck at the slump stand	20
3.8	Washout pit at the newly constructed concrete batching plant	21
3.9	Product storage stockpiles adjacent to the south of the concrete batching plant	21
3.10	Pug mill	22
3.11	Covered conveyor belt that transports aggregates from the rail facility to the RHDC	22
3.12	Inside the rail unloading building	23

Independent Audit Certification Form

Development Name	Rooty Hill Regional Distribution Centre (RHDC)
Development Consent No.	DA 05_0051
Description of Development	RHDC is the primary location for the distribution of construction material (aggregate, sand and concrete) from Holcim (Australia) Pty Ltd's Lynwood Quarry located in Marulan, Southern Highlands, NSW, into the Sydney market.
Development Address	21 Kellogg Road, Rooty Hill NSW 2766
Operator	Holcim (Australia) Pty Limited
Operator Address	PO Box 597, Plumpton NSW 2761, Australia
Independent Audit	
Title of Audit	Rooty Hill Distribution Centre Independent Environmental Audit
<p>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</p> <ul style="list-style-type: none"> The audit has been undertaken in accordance with relevant approval condition(s) and in accordance with the auditing standard AS/NZS ISO 19011:2014 and Post Approval Guidelines – Independent Audits; The findings of the audit are reported truthfully, accurately and completely; I have exercised due diligence and professional judgement in conducting the audit; I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit; I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child; I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family); Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so. <p>Note:</p> <ol style="list-style-type: none"> The Independent Audit is an 'environmental audit' for the purposes of section 122B(2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000. The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both). 	
Signature	
Name of Lead/ Principal Auditor	Dr Philip Towler
Address	Ground Floor, Suite 01, 20 Chandos Street, St Leonards NSW 2065
Email Address	ptowler@emmconsulting.com.au
Auditor Certification (if relevant)	-
Dates	29 November 2018

1 Introduction

EMM Consulting Pty Limited (EMM) has been commissioned to undertake an independent environmental audit of the Holcim (Australia) Pty Limited (Holcim) Rooty Hill Regional Distribution Centre (RHDC), located at 21 Kellogg Road, Rooty Hill, New South Wales (NSW). The site location and layout of the RHDC is shown in Figure 1.1.

1.1 Overview of the operation

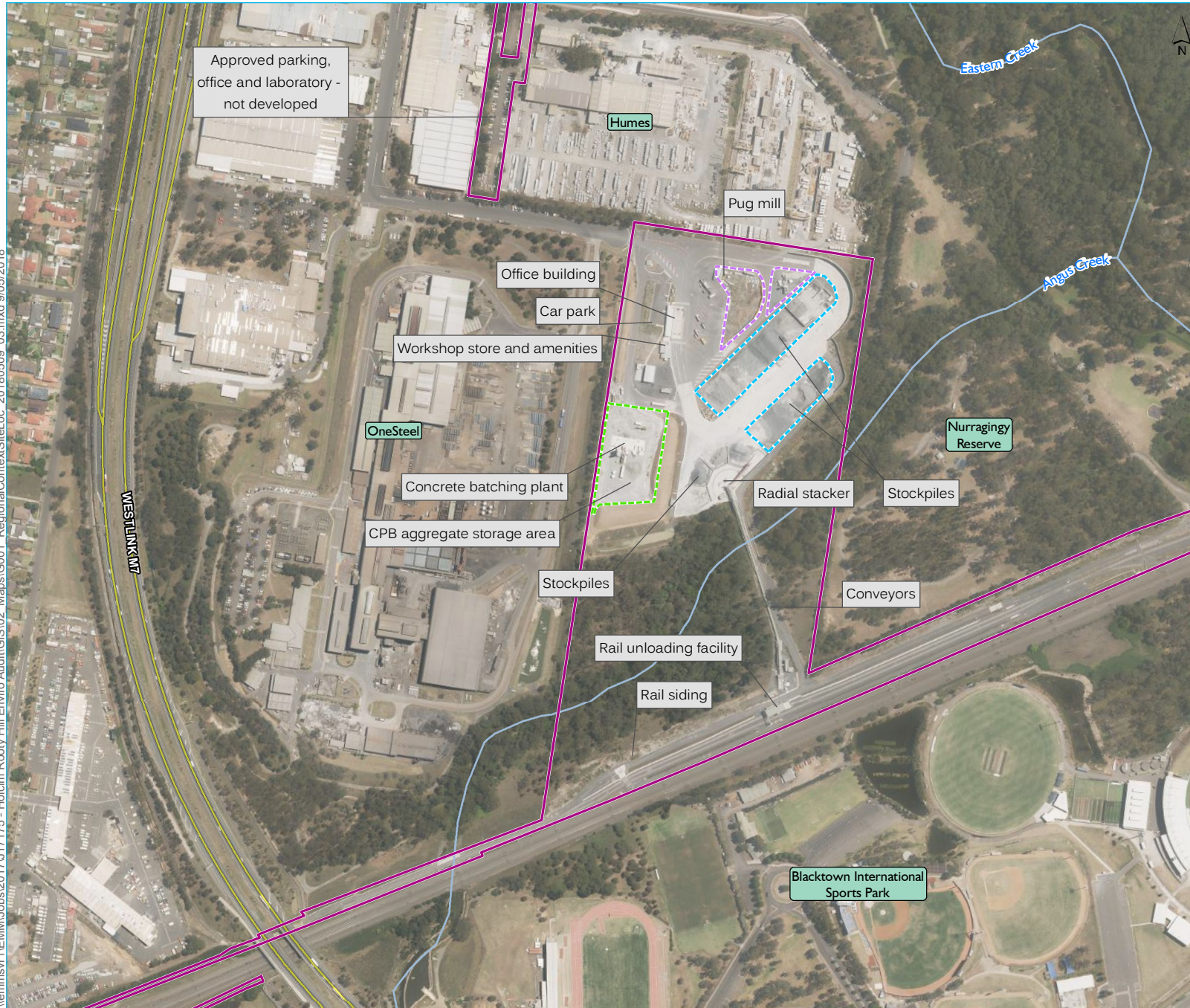
The RHDC was approved by the Acting Minister for Planning on 26 April 2006 under Land & Environment Court Decision No. 05_0051 (DA 05_0051). The consent is for the construction and operation of a regional distribution centre that receives construction material by rail and distributes this material by road to the Sydney market. Since the original development approval, two minor modifications have been made to the DA 05_0051.

The legal property description for the site is given in Table 1.1.

Table 1.1 **Legal description of the site**

Deposited plan (DP)	Lot number	Owner
1150066	1	Holcim
582388	1 (part of)	Humes (owned by Holcim)

\\lemmsvr1\EMM\Jobs\2017\17175 - Holcim Rooty Hill Enviro Audit\GIS\02 Maps\G001 RegionalContext\SiteLoc 20180509 03.mxd 9/05/2018



- KEY
- Approved RHDC site boundary
 - Concrete batching plant area
 - Approved stockpile area (Mod 2)
 - Current stockpile area
 - Main road

Regional context and
site location

Holcim regional distribution centre
Independent environmental audit

Figure 1.1



1.2 Audit objectives

This independent environmental audit is required under Condition 3.5 of DA 05_0051. This development consent was most recently modified in June 2017 (MOD2).

The objectives of the audit are to meet the requirements of Condition 3.5:

The Proponent shall commission an independent person or team to undertake an Environmental Audit of the project at six months, and at two years after the commencement of operation of the project, and then as may be directed by the Director-General. The independent person or team must be approved by the Director-General prior to the commencement of the Audit. The Audit must:

- a) be carried out in accordance with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing;
- b) assess compliance with the requirements of this approval, and other licences and approvals that apply to the project;
- c) assess the environmental performance of the project against the predictions made and conclusions drawn in the documents referred to under condition 1.1 of this approval; and
- d) review the effectiveness of the environmental management of the project, including any environmental impact mitigation works.

An Environmental Audit Report shall be submitted to the Director-General within two months of the completion of the Audit, detailing the findings and recommendations of the Audit and including a detailed response from the Proponent to any of the recommendations contained in the Report.

The Director-General may require the Proponent to undertake reasonable works to address the findings or recommendations presented in the Report in relation to compliance with this approval. Any such works must be completed within such time as the Secretary may require.

Note: This condition only requires audits to be undertaken and reported for the period prior to the approval of MOD2.

Given that the majority of the audit period (31 March 2016 to 12 December 2017) was prior to the approval of MOD2 on 29 June 2017, Condition 3.5 has been applied rather than Condition 3.5A. However, it is noted that agencies were consulted as part of this audit in accordance with Condition 3.5A.

This audit has been prepared in accordance with:

- the NSW Government's (2015) *Independent Audit Guideline*; and
- AS/NZS ISO 19011:2014 Guidelines for Auditing Management Systems.

1.3 Audit criteria

Audit criteria are the policies, procedures or requirements against which an action will be compared. In this case, the audit criteria are the conditions, requirements and commitments in:

- Major Projects Application DA 05_0051 and associated assessments (2005);

- Modification Application DA 05_0051 MOD1 and the accompanying environmental assessment (EA) (2011);
- Modification Application DA 05_0051 MOD2 and the accompanying EA (2017);
- Environment Protection Licence (EPL) 12939 as varied on 28 September 2015 – RHDC; and
- environmental management plans, programs and reporting required under the approvals listed above.

1.4 Audit scope

As noted in the NSW Government's (2015) *Independent Audit Guidelines*, the audit scope should detail:

- the physical boundaries of the audit;
- the time period covered by the audit; and
- the organisational units, activities and processes that will be covered.

The scope of this independent environmental audit is:

- all relevant conditions specified in DA 05_0051 including the attached Statement of Commitments, and EPL 12939;
- the audit period being 31 March 2016 (previous audit site inspection) to 12 December 2017 (this audit site inspection); and
- the spatial extent limited to the land defined in the DA 05_0051 Conditions, Appendix A, Attachment 2: Approved Project Layout.

Development of an office, a laboratory and parking on Lot 1, DP 582388 (the 'Hume site') is approved by DA 05_005. These facilities have not been developed. Therefore, this audit only considers activities on the main RHDC site (Lot 1, DP1150066) and does not address the activities on the Hume site.

This independent environmental audit covers the activities undertaken by Holcim and its contractors, relating to the RHDC that are referred to in the regulatory approvals listed above.

This is the second independent environmental audit for the RHDC. The 2016 independent environmental audit of the RHDC was undertaken by EMM.

2 Audit method

2.1 Audit team roles and responsibilities

The audit team was made up of representatives of Holcim and EMM.

2.1.1 Holcim audit team

Alana White, Holcim Senior Environment and Community Liaison. In this role, A. White is responsible for implementing management plans and providing advice on complying with the conditions of consent.

Rochelle Zammit, Holcim Site Manager – Rooty Hill. In this role, R. Zammit is responsible for the day to day management and compliance at the RHDC site.

2.1.2 EMM audit team

The lead auditor and lead audit report author was Dr Philip Towler, EMM Associate Director. P. Towler has 20 years experience in managing environmental programs. He has expertise in the preparation of environmental and social impact assessments; conducting environmental audits and due diligence reviews; and preparing environmental management plans for resources projects around Australia and internationally. P. Towler was the lead auditor for the previous independent environmental audit of the RHDC site.

Tania Amanovic, EMM Environmental Scientist, provided support to the lead auditor.

The EMM audit team was endorsed by the Department of Planning and Environment (DPE) to undertake the audit.

2.1.3 Independence of the audit team

P. Towler and T. Amanovic are independent of Holcim as defined by the criteria listed in Section 3.3 of the NSW Government's (2015) *Independent Audit Guideline*.

2.2 Approvals and documents audited

The approvals and documents audited include:

- DA 05_0051;
- the original EA prepared for Readymix by National Environmental Consulting Services (14 October 2005);
- the MOD1 EA prepared by Umwelt Environmental Consultants (September 2010);
- the MOD2 EA prepared by Umwelt Environmental Consulting (February 2017);
- EPL 20672;
- environmental management plans, monitoring programs and reports, and agency correspondence for the RHDC, including:

- Operational Environmental Management Plan (OEMP) dated 16 September 2015, which includes a number of other management plans and monitoring programs including but not limited to:
 - Noise Management Plan;
 - Operational Noise Management Protocol;
 - Traffic Management Plan;
 - Soil and Water Management Plan;
 - Dust Management Plan;
 - Vegetation Management Plan;
 - Energy Savings Management Plan; and
 - operational environmental monitoring program;
- Landscape Plan (Rooty Hill Regional Distribution Centre – Detailed Landscape Package);
- Construction Environmental Management Plan (CEMP) (October 2014);
- Community Consultation Strategy;
- Emergency Response Plan; and
- Final Hazard Analysis.
- Annual Environmental Management Review for 1 October 2015 to 30 September 2016;
- Annual Environmental Management Review for 1 July 2016 to 30 June 2017;
- Annual Return for 28 September 2016 to 27 September 2017;
- Environmental monitoring reports, including:
 - *Rooty Hill RDC Quarterly environmental monitoring report – Q2 2017* prepared by Jacobs (31 July 2017);
 - *Rooty Hill RDC Quarterly environmental monitoring report – Q1 2017* prepared by Jacobs (1 May 2017);
 - *Rooty Hill RDC Quarterly environmental monitoring report – Q4 2016* prepared by Jacobs (3 February 2017);
 - *Rooty Hill RDC Quarterly environmental monitoring report – Q3 2016* prepared by Jacobs (21 October 2016);
 - *Rooty Hill RDC Quarterly environmental monitoring report – Q2 2016* prepared by Jacobs (22 September 2016);

- *Rooty Hill RDC Quarterly environmental monitoring report – Q1 2016* prepared by Jacobs (10 May 2016);
- depositional dust monitoring results with results dating from February 2016 to November 2017; and
- water quality data from April 2016 to September 2017;
- transport monitoring summary from 5 January 2016 to 1 December 2017;
- terrestrial ecology summary including biometric data from spring 2012 to winter 2017;
- waste collection/disposal log with entries from 31 March 2017 to 23 February 2018;
- government agency correspondence related to subject matters covered in various conditions of consent;
- INX internal online reporting system including:
 - community complaints register;
 - breach of licences and permits register; and
 - environmental incidents register.

2.3 Audit activities

2.3.1 Inception teleconference

An inception teleconference was held at the start of the site inspection (see below).

2.3.2 Agency consultation

A letter was sent to relevant agencies requesting their input to the audit (see Section 4.5).

2.3.3 Site inspection

A full day site inspection was undertaken by EMM's audit team, P. Towler and T. Amanovic on 12 December 2017. They were escorted by A. White and R. Zammit. The site inspection included interviews with A. White and R. Zammit, a review of the environmental files (electronic softcopies), requests for further documentation held on site and an inspection of the entire site.

2.3.4 Interviews

During the interviews with A. White and R. Zammit, the following items were discussed:

- their roles;
- their environmental responsibilities;
- their environmental reporting responsibilities; and

- their understanding of environmental issues at the site.

2.3.5 Draft report

The results of the audit were documented in a draft audit report. The draft audit report was provided to Holcim on 9 May 2018 for review and comments prior to finalisation.

2.3.6 Report finalisation

The report was finalised with consideration of the comments received from Holcim.

2.3.7 Closing teleconference

A closing meeting (teleconference) was held following provision of the draft audit report on 9 May 2018. The draft audit report findings and recommendations were discussed.

2.4 Assessment criteria and method of reporting

The compliance assessment criteria adopted for this independent environmental audit is in accordance with the criteria provided within the NSW Government's (2015) *Independent Audit Guidelines*. The compliance assessment criteria is summarised in Table 2.1.

Table 2.1 Compliance assessment criteria

Assessment	Criteria
Compliant	Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit.
Not verified	Where the auditor has not been able to collect sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of sufficient verification of the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc) that a requirement has been met. In such situation, the requirement should still be assessed as not verified. However, the auditor could note in the report that they have no reasons to believe that the operation is non-compliant with the requirement.
Non-compliant	Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent of one or more specific elements of the regulatory approval have not been complied with within the scope of the audit.
Administrative non-compliance	A technical non-compliance with a regulatory approval that would not impact on performance and that is considered minor in nature (e.g. report submitted but not on the due date, failed monitor or late monitoring session). This would not apply to performance-related aspects (eg exceedance of a noise limit) or where a requirement had not been met at all (e.g. noise management plan not prepared and submitted for approval).
Not triggered	A regulatory approval requirement has an activation or timing trigger that had not been met at the time of the audit inspection; therefore a determination of compliance could not be made.
Observation	Observations are recorded where the audit identified issues of concern which do not strictly relate to the scope of the audit or assessment of compliance. Further observations are considered to be indicators of potential non-compliances or areas where performance may be improved.
Note	A statement or fact, where no assessment of compliance is required.

Source: NSW Government 2015; *Independent Audit Guideline*.

Where non-compliances are identified, a risk level has been identified in accordance with the descriptions provided in Table 2.2.

Table 2.2 Risk levels of non-compliances

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

Source: NSW Government 2015, *Independent Audit Guideline*.

The content of this audit report and the method of reporting is consistent with the NSW Government's (2015), *Independent Audit Guideline*.

3 Audit context

3.1 Holcim environmental systems

Holcim operates a national incident reporting system, referred to as INX, which is linked to Holcim's head office in Switzerland. Holcim advised that the INX reporting system covers all aspects of Holcim's operations, including environmental incidences, community feedback and complaints, near exceedance events and any other matters relating to operations across all Holcim sites. Incidences are allocated a rating, based on the level of severity, and tracked through the INX system from the date of the incident to the action taken to remedy the incident.

3.2 Site management

The RHDC commenced operations on 1 October 2015, with a current distribution capacity significantly less than the approved capacity of 4 million tonnes per annum.

R. Zammit, Holcim Site Manager – Rooty Hill and A. White, Holcim Senior Environment and Community Liaison are responsible for on-site environmental management.

A number of consultants are engaged to undertake monitoring of all environmental commitments required by the environmental licence and development consent conditions, as well as Holcim's environmental commitments approved along with the development consent.

The site's Operational Environmental Management Plan (OEMP) includes Holcim's environmental policy and the following management plans:

- Noise Management Plan;
- Operational Noise Management Protocol;
- Traffic Management Plan;
- Soil and Water Management Plan;
- Dust Management Plan;
- Vegetation Management Plan; and
- Energy Savings Management Plan.

The OEMP also includes the following elements that assist in identification monitoring and compliance management of environmental values, risks and impacts during operations:

- Environmental control plans for non-key issues;
- Sensitive area diagram;
- Compliance tracking register;
- Environmental legal register;

- Emergency contacts;
- Environmental incident notifications;
- Environmental risk assessment;
- Operational environmental monitoring plan;
- Environmental inspection program;
- Environmental site inspection checklist;
- OEMP audit program;
- Template Transport Code of Conduct for Heavy Vehicles; and
- Holcim Code of Conduct.

3.3 Land use

The predominant land use north and west of the RHDC site boundary is heavy industry (OneSteel and Humes fabrication facilities). Open space parkland borders the entire eastern boundary (Nurragingy Reserve), which is approximately 63 hectares (ha) in area. The rail siding (loading facility), main passenger and freight rail line (Western Line) and Westlink M7 motorway border the southern portion of the RHDC site. The Rooty Hill Station is approximately 1 km west of the property boundary.

The Blacktown International Sports Park, consisting of an athletic centre, baseball centre, cricket practice centre, soccer field, softball centre and function rooms, is to the south – across the rail line.

3.4 Environmental

The site operations area is entirely sealed and drained to catchment systems that filter sediment from surface water run-off prior to their release to a sediment pond (retention basin) located at the southern boundary of this area. All surface water run-off is directed to this area which is able to cater for retention of water during minor flood events to inhibit release of sediment and run-off to Angus Creek.

The Angus Creek Zone is excluded from further development, and is subject to the conditions of the in DA 05_0051 and EPL 12939 with respect to vegetation and riparian management.

3.5 Social

The site is situated in the south eastern portion of a large industrial estate with the nearest residential suburbs being Rooty Hill (approximately 650 m due west) and Doonside (approximately 850 m due east). There are no nearby residential areas south of the site towards Eastern Creek, with residences in Bungarribee (south east) approximately 2.3 km from the site. Residences in Glendenning are more than 2 km from the RHDC site. The main potential impacts from the site relate to noise and air quality at relatively distant residences and in the adjacent Nurragingy Reserve.

3.6 RHDC operations

The key aspects of the quarry operations are summarised in Table 3.1.

Table 3.1 **Project summary**

Component	Approved development
Approved production	4 million tonnes per year
Product received	All material received via rail, loaded by conveyor.
Product transport	All material distributed by road.
Material received	Single size crushed aggregate, blended crushed aggregates and natural/ manufactured sand.
Hours of operation	RHDC site is approved to operate 24 hours a day, seven days a week.
Operational workforce	About 12–14 full time employees on-site
Infrastructure	<p>Rail siding and unloading facility, main on-ground concrete storage bins and truck load out facility, conveyor system, linking the unloading station to the storage and truck facilities, site offices, truck wash down, truck refuelling, weighbridges and parking, workshop and stores.</p> <p>A CBP, which commenced operations on 13 December 2016.</p> <p>Construction of traffic light signals to the intersection of Kellogg Road and Woodstock Avenue, a single land roundabout at the intersection of Glendenning Road and Woodstock Avenue, upgrade of Kellogg Road.</p>
Concrete batching plant (CBP) approved production	<p>A CBP has been constructed on site which commenced operations on 13 December 2016.</p> <p>A CBP is approved for the site that can produce up to 200,000 cubic metres (m³) of concrete per annum.</p>

An overview of the key elements of the RHDC site is provided in the following photographs.



Photograph 3.1 **Maintenance shed and banded oil storage area**



Photograph 3.2 View east from conveyor to concrete storage bays and truck loading area



Photograph 3.3 View north from conveyor to concrete storage bays and truck loading area



Photograph 3.4 Stormwater pipe from the concrete batching plant area



Photograph 3.5 Fuel storage to the left and parking for concrete agitator trucks in the distance



Photograph 3.6 **The newly constructed concrete batching plant**



Photograph 3.7 **Concrete agitator truck at the slump stand**



Photograph 3.8 **Washout pit at the newly constructed concrete batching plant**



Photograph 3.9 **Product storage stockpiles adjacent to the south of the concrete batching plant**



Photograph 3.10 Pug mill



Photograph 3.11 Covered conveyor belt that transports aggregates from the rail facility to the RHDC



Photograph 3.12 **Inside the rail unloading building**

4 Audit results

4.1 Overview

RHDC's compliance with the conditions listed in Section 1.4 is detailed in the audit tables in Appendices A–C.

The audit tables provide:

- the approval or licence name;
- the schedule and condition number for each item;
- the requirement being assessed (ie the condition description);
- the evidence used to assess compliance;
- the compliance status based on the criteria provided in Table 2.1;
- the risk level of non-compliance as provided in Table 2.2; and
- comments and recommendations from the lead auditor based on the outcomes of the audit.

4.2 Audit results

A summary of the conditions where a non-compliance or an administrative non-compliance was recorded is provided in Table 4.1. A summary of recommendations that were not associated with a non-compliance is provided in Table 4.2.

4.3 Previous (2016) audit results

A summary of the conditions where a non-compliance or an administrative non-compliance was recorded in the 2016 independent environmental audit is provided in Appendix D. All but one non-compliance has been addressed. The remaining non-compliance (DA 05_0051 Condition 2.26) relates to the submission of the Vegetation Management Plan monitoring reports to DPE.

Table 4.1 **Non-compliance summary**

Schedule/ Condition number	Condition	Compliance status	Comments and recommendations
DA 05_0051			
1.1	<p>The Proponent must carry out the project generally in accordance with the:</p> <p>a) Project Application 05_0051;</p> <p>b) Environmental Assessment Report ... October 2005;</p> <p>c) Response to Issues Raised in Submissions to EAR ... February 2006;</p> <p>d) the final Statement of Commitments, submitted by the Proponent to the Department on 17 March 2006; and</p> <p>e) the Environmental Assessment Report - Proposed Minor Modification to Holcim Regional Distribution Centre (RDC) ... October 2010, including the Response to Submissions ... 9 December 2010, and the March 2011 Modification Statement of Commitments ...;</p> <p>f) the Environmental Assessment Report ... February 2017; including the Response to Submissions ... 16 May 2017; and</p> <p>f) the conditions of this approval.</p> <p>Note: The general layout of the project is shown in Attachment 3.</p>	Non-compliant	<p>The concrete batching plant (CBP) and the aggregate storage areas are substantially different from the approved facilities. See Section 4.4 for details.</p> <p>Recommendation: actions are taken to ensure that material storage and handling facilities, and the CBP, are constructed and operated as approved. This could be through:</p> <ul style="list-style-type: none"> • amending existing site components and layout to comply with DA 05_0051 (as modified); and/or • seeking advice from relevant government agencies, including DPE and EPA, on achieving compliance with Condition 1.1 of DA 05_0051 (as modified).
1.13	<p>The Proponent must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p>Notes: Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works.</p>	Non-compliant	<p>The CBP was constructed without a construction certificate and is being operated without an occupation certificate.</p> <p>Recommendation: advice is sought from DPE regarding addressing this non-compliance.</p> <p>See Section 4.5 for details.</p>

Table 4.1 **Non-compliance summary**

Schedule/ Condition number	Condition	Compliance status	Comments and recommendations
	Part 8 of the EP&A Regulation sets out the requirements for the certification of the Project.		
2.8	<p>The Proponent must design, construct, commission, operate and maintain the project in a manner that minimises dust emissions from the site, as specified in paragraph of the final Statement of Commitments submitted by the Proponent to the Department on 17 March 2006, including:</p> <p>...</p> <p>b) all storage bins must be enclosed;</p> <p>...</p>	Non-compliant	The majority of these measures are complied with, however all storage bins are not enclosed. This is addressed in regards to Condition 1.1.
2.11	The Proponent must take reasonable measures to ensure that heavy vehicles accessing the site must not queue within the adjacent local road network.	Non-compliant	<p>Truck associated with the facility were observed parked on Kellogg Road within 100 m of the site.</p> <p>Recommendation: it should be ensured that no trucks are queuing or parking along the local road network at any time.</p>
2.12	The Proponent must take reasonable measures to ensure that vehicles used for the construction and/or operation of the project must not park on local roads in the vicinity of the project at any time.	Non-compliant	See Condition 2.11.
2.21A	<p>The number of on-site and truck parking spaces to be provided for the project must be in accordance with sections 5.4.3, 5.4.4 and 5.4.6 of the EAR as follows:</p> <p>a) truck parking: 50 spaces (truck and dog configuration);</p> <p>b) car parking: a total of 310 spaces on the project site and Humes site, as follows:</p> <p>i) project site: 121 spaces</p> <p>ii) Regional office and laboratory: 189 spaces, of which</p>	Administrative non-compliance	<p>This condition has not been met at this stage, as construction of all approved components (eg laboratory) had not been completed on the date of the site audit on 12 December 2017. The status on the date of the site audit was:</p> <ul style="list-style-type: none"> there are approximately 14 delineated truck (and dog) parking spaces currently, with some provision for more parking once construction of the remaining components are completed; there are approximately 38 delineated car parking spaces provided adjacent the site office/administration;

Table 4.1 **Non-compliance summary**

Schedule/ Condition number	Condition	Compliance status	Comments and recommendations
	<p>84 are to be allocated to the project site staff and visitors and 105 are to be allocated to the staff and visitors to the existing Humes site;</p> <p>c) all car parking spaces must be marked/signposted in accordance with the above allocations. All visitor spaces must be located conveniently in relation to the various administrative offices on the site and must be clearly marked and signposted.</p> <p>d) all car and truck parking spaces must be sealed in a hardstanding material and drained in accordance with the approved stormwater management plan for the project;</p> <p>e) the design and dimensions of all truck and car parking spaces, together with all associated roads and manoeuvring areas, must be in accordance with AS2890.2 (2002);</p> <p>f) a detailed car and truck parking plan, at a scale of 1:200, and incorporating the above requirements, must be submitted for the approval of the Secretary prior to the commencement of any works.</p>		<ul style="list-style-type: none"> all light vehicle parking spaces are clearly delineated, all parking areas sealed and drained to the site stormwater system; there are no dedicated parking spaces for trucks in the CBP area; and truck and vehicle turning and manoeuvring areas appear to be constructed in accordance with the AS2890.2 (2002). <p>A letter from Department of Planning and Infrastructure (7 December 2012, ref - 10/22440) approves truck and car space requirement reductions, however this predates the MOD2 condition.</p> <p>Holcim is reducing its vehicle fleet and using contractor-owned and contractor - operated heavy vehicles - these do not park at the RHDC.</p> <p>Based on staff numbers and site observations, there are adequate light vehicles spaces on the site currently.</p> <p>It is understood that Holcim do not propose to develop the Regional office and laboratory site. Therefore, these 189 spaces will not be required.</p> <p>Recommendation: the number of required parking sites should be modified.</p>
2.26	Immediately after completion of initial planting/seeding and every year thereafter for the duration of the maintenance period the Proponent must submit to the Department a monitoring report addressing the performance criteria as specified in the Vegetation Management Plan, and comment on the stability and condition of any stream works. With each monitoring report, the person responsible for implementing the Vegetation Management Plan must certify in writing that	Administrative non-compliance	<p>It is unknown whether the required monitoring report has been submitted to DPE.</p> <p>Recommendation: the monitoring reports should be submitted to DPE, including certification that plantings (including follow-up plantings) have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.</p>

Table 4.1 **Non-compliance summary**

Schedule/ Condition number	Condition	Compliance status	Comments and recommendations
	plantings (including follow-up plantings) have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.		
3.2	The Proponent must review the Operational Monitoring Program referred to under condition 3.1 on a six-monthly basis, and may, with the agreement of the Secretary, alter the frequency and/ or scope of monitoring provided:...	Non-complaint	There is no evidence that the Operational Monitoring Program has been reviewed on a six-monthly basis. Recommendation: the Operational Monitoring Program should be reviewed following finalisation of this audit and every six months thereafter.
5.1	Prior to the commencement of site preparation works, the Proponent must nominate a suitably qualified and experienced Environmental Representative(s) whose appointment is to receive prior approval of the Secretary. The Proponent must employ the Environmental Representative(s) on a full-time basis, or as otherwise agreed by the Secretary, during the operations at the site. The Environmental Representative must be: ... The Proponent must notify the Secretary of any changes to that appointment that may occur from time to time.	Administrative non-compliance	During the previous audit, a letter from the Department of Planning and Infrastructure (19 November 2015) advising of approval for the appointment of Mr Brian Cassel as the new environmental representative for the site (previously Mr George Poljak) was sighted. The Secretary has not been informed of the change to Rochelle Zammit. Recommendation: the Secretary should be informed of changes to Environmental Representative(s) appointments.
5.2	The Proponent must prepare and implement a Construction Environmental Management Plan to outline environmental management practices and procedures to be followed during the site preparation and construction activities during each stage of the project....	Non-compliant	The Stage 2 CEMP indicates that possible future construction as Stage 3 includes the CBP and a blending/pug mill. Both of these facilities were constructed in the audit period but are not specifically covered by a CEMP. It is noted that no complaints were registered during the construction of these facilities. Recommendation: the CEMP should be updated prior to any future building

Table 4.1 **Non-compliance summary**

Schedule/ Condition number	Condition	Compliance status	Comments and recommendations
			works.
EPL 20672			
P1.2	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or setting of limits for the emission of noise from the point. [See table in Appendix B].	Administrative non-compliance	Noise monitoring is routinely undertaken at: <ul style="list-style-type: none"> • Knox Road; • Blacktown International Sports Park; • Station Street; and • Nurranginy Reserve. The following sites have been monitored but are not routinely monitored: <ul style="list-style-type: none"> • Crawford Road; and • Mavis Street. Total noise levels were consistently above noise criteria regardless of whether the site was operating or not (ie the site makes a small to negligible contribution to total noise levels). There is little value in noise monitoring at Crawford Road or Mavis Street. Recommendation: Holcim applies for the EPL to be amended to remove the requirement for monitoring at Crawford Road or Mavis Street.
Statement of commitments			
1	To carry out the project generally in accordance with the documents listed in condition 1.1.	Non-compliant	See Development Consent Condition 1.1.

Table 4.2 **Additional recommendations**

Schedule / Condition number	Condition	Compliance status	Comments and recommendations
DA 05_0051			
4.1	By 30 September 2011, the Proponent must: (a) make copies of the following publicly available on its website:	Compliant	The website includes the documents related to the original EA, MOD1 and MOD2. These are indexed as "Environmental Assessment Report & Response", "Environmental Assessment Report (2010)" and "Project Application & Approval" respectively. Recommendation: the website is updated so that the index refers to "Original Environmental Approval", "MOD 1 Environmental Approval" and "MOD 2 Environmental Approval", or similar.

4.4 Stockpiles and concrete batching plant

Condition 1.1 of DA 05_0051 states that “The Proponent must carry out the project generally in accordance with [the documents listed in this condition]”, including the original environmental assessment and those prepared for MOD1 and MOD2, and with the conditions of the approval.

The following site components are substantially different from those approved:

- material handling, stockpiling and load-out; and
- CBP and adjacent aggregate storage area.

A comparison between these components as described in the original environmental assessment, in the MOD1 and MOD2 environmental assessments and as observed during the site inspection is provided in Table 4.3.

Table 4.3 **Approved product storage activities at Rooty Hill Regional Distribution Centre**

Major Projects Application DA 05_0051	MOD 1	MOD 2	As at site inspection (12 December 2017)
Storage bins area and ground storage			
<ul style="list-style-type: none"> The main storage area to consist of three rows of 10 bins (bulk storage bins). Each bin to have a capacity of 2,000 to 2,500 tonnes (t), with the total storage capacity of the area approximately 60,000 t. The bins to be approximately 33.5 m high to the top of the main transfer tower that feeds the material to the bins. 	<ul style="list-style-type: none"> Change from elevated steel bins to on-ground concrete storage bins (23 m high) - see MOD 1 EA Figures 3.3 and 3.4 [see Figures 4.3 and 4.4 below]). Each bin to have a 2,500 t capacity depending on the material being stored. Total capacity unchanged. 	<ul style="list-style-type: none"> The modification approves using a new area (0.43 ha) adjacent to the existing truck parking area for stockpiling. The MOD 2 EA does not mention modification of approved storage bins. MOD 2 EA Figure 1.2 [see Figure 4.5 below] incorrectly indicates that the stockpile area as shown in the aerial photograph as 'approved'. MOD 2 EA Figure 2.1 shows the approved (but not constructed) layout. <p>From EA Section 5.2 Air Quality:</p> <ul style="list-style-type: none"> Existing conditions require the enclosure of all storage bins. "The Department is satisfied that air quality impacts from the proposed site would be minimal, and would be suitably managed through modified conditions and the Dust Management Plan." 	<ul style="list-style-type: none"> Material is stored in four bays around the radial stacker, two large bays (~130 m x 35 m and ~110 m x 35 m) and six smaller bays. These are not described in any of the EA documents. There are no concrete storage bins as approved by MOD 1. The stockpiling area approved by MOD 2 has not been constructed.
<ul style="list-style-type: none"> Construction of five ground storage bays each with a capacity of 500 t west of the main stockpiling area. 	<ul style="list-style-type: none"> Remove 500 t ground storage bins (as shown in original EA Fig 5.1 [see Figure 4.1 below]). 	<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> There are no ground storage bins west of the main stockpiling area.
Rail to storage			
<ul style="list-style-type: none"> Use of an above ground conveyor system to transfer materials from the rail 	<ul style="list-style-type: none"> Materials transferred from the rail unloading facilities to storage bins via an 	<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> Material is transferred from the rail unloading facilities to the radial stacker by

Table 4.3 **Approved product storage activities at Rooty Hill Regional Distribution Centre**

Major Projects Application DA 05_0051	MOD 1	MOD 2	As at site inspection (12 December 2017)
unloading facilities to the storage bins.	underground conveyor system.		conveyor. <ul style="list-style-type: none"> There are no conveyors to transfer material to the stockpiles.
Radial stacker and reclaim facilities			
<ul style="list-style-type: none"> The radial (telescopic) stacker is a fail safe mechanism allowing trains to be unloaded and returned to the rail system is there if there is a malfunction with the operation of the main storage system, or if materials at the unloading station are contaminated. The reclaim hopper would feed material back into the main storage bins from the radial stacker stockpiles or would allow for special/ other products brought in by road to be held in the main storage system. 	<ul style="list-style-type: none"> No change proposed to radial stacker. EA: "The radial stacker is a contingency measure and will only be used if there is a malfunction with the loading of the main storage bins. For assessment purposes it has been assumed that the radial stacker will be operating for 10% of the time." 	<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> Only the radial stacker is used to transfer material from the rail unloading facilities.
<ul style="list-style-type: none"> Five on-ground storage bays around the radial stacker. 	<ul style="list-style-type: none"> Increased capacity of on-ground storage bays around the radial stacker. 	<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> Material is stored in four bays around the radial stacker. Not in configuration shown in MOD 1 EA Figure 3.3.
Load-out			
<ul style="list-style-type: none"> Loads to be transferred from the main storage bins to a loading bin via a conveyor and diverter chute. Material to be transferred to trucks via a telescopic chute. Load out facilities to consist of two truck loading stations (enclosed on three sides), 	<ul style="list-style-type: none"> Replace above-ground reclaim conveyor with below-ground reclaim conveyor system. The below ground system to feed material from the concrete storage bins to the truck loading facility for load-out to road trucks for delivery to customers. 	<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> All trucks are loaded by front-end loader from the open bays and from the stockpiles around the radial stacker and the main stockpiling area. There is no below ground reclaim conveyor system. There are no truck loading stations.

Table 4.3 **Approved product storage activities at Rooty Hill Regional Distribution Centre**

Major Projects Application DA 05_0051	MOD 1	MOD 2	As at site inspection (12 December 2017)
each containing two truck loading points.	<ul style="list-style-type: none"> Removal of reclaim hopper. All material stored in the radial stacker stockpiles would be transferred directly to trucks for distribution via front end loader. Minor changes to the conveyor and chute system to reflect the revised project configuration. 		
Concrete batching plant			
<ul style="list-style-type: none"> The CBP would have a capacity of 200,000 m³ and would consist of 4 silos (23 m tall) and would store 120 t of product. The facility would also include parking for agitators, holding bins, open on ground aggregate storage bins (capacity of 1,740 t), washout pits, truck wash bays, and office and amenity facilities. 20 agitator parking bays. Layout provided in EA Figure 5.15 [see Figure 4.2 below]. 	<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> The CBP layout is substantially different from that shown in EA Figure 5.15[see Figure 4.2 below].

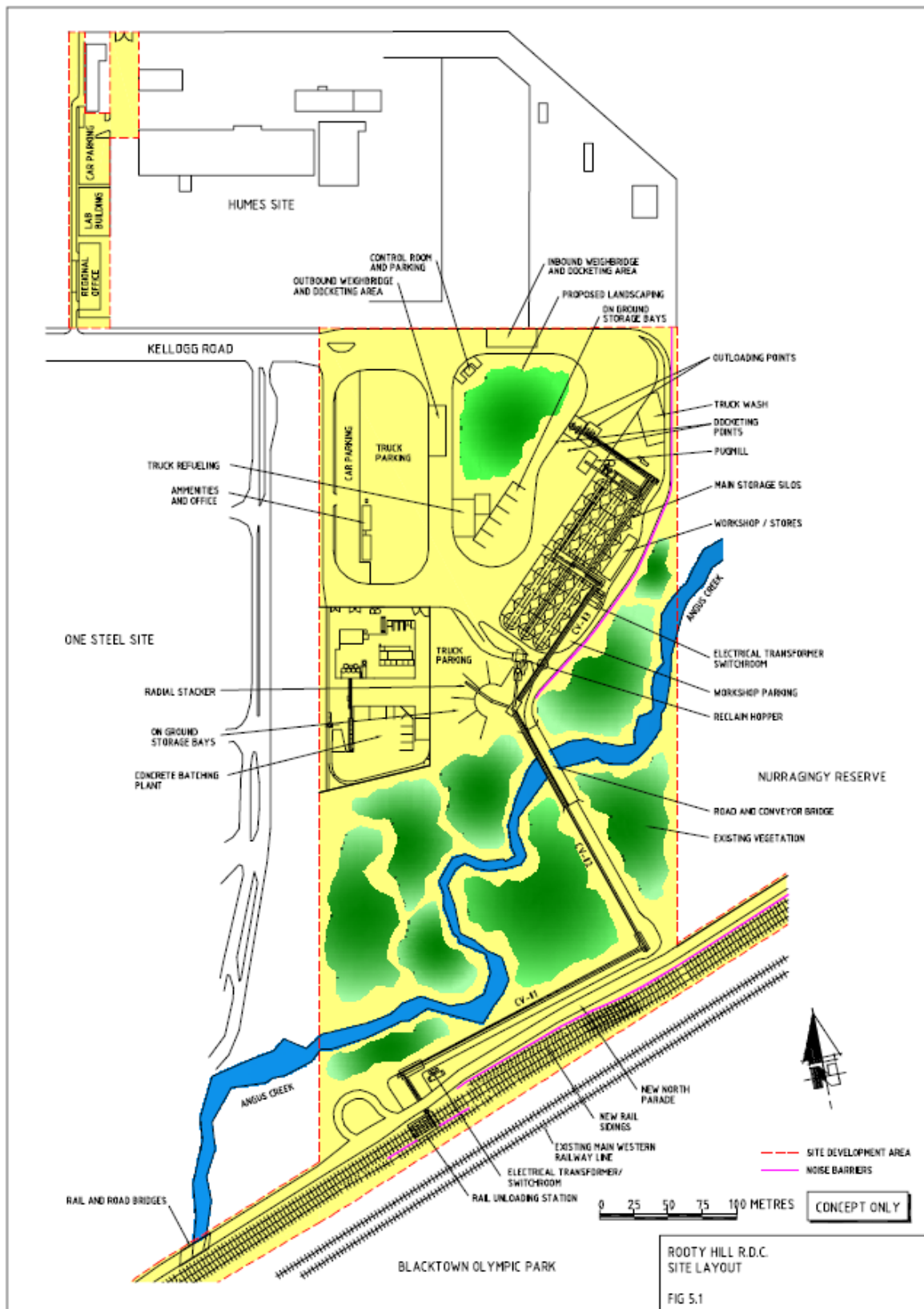


Figure 4.1

Figure 5.1 from original Environmental Assessment (National Environmental Consulting Services 2005)

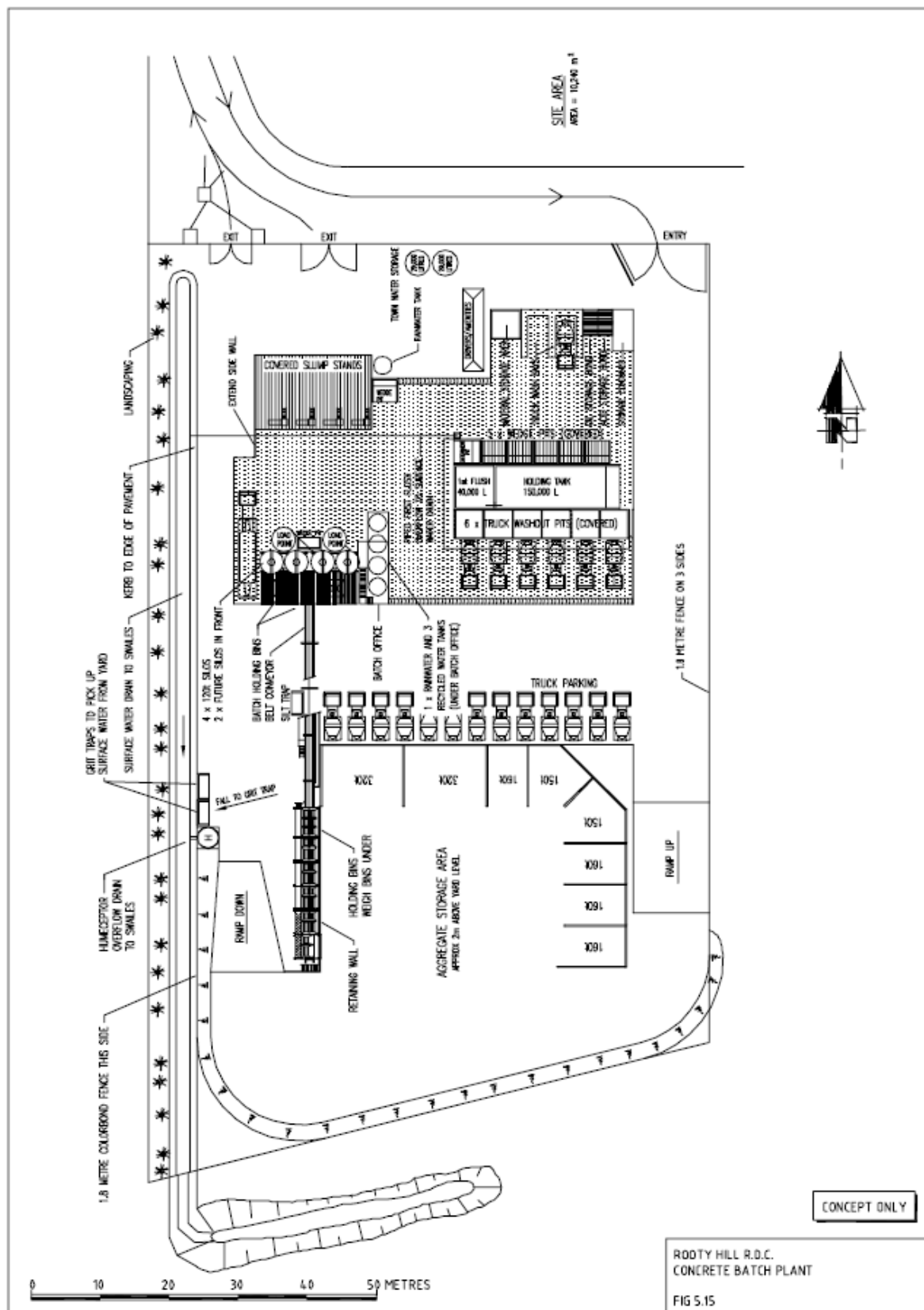


Figure 4.2

Figure 5.15 from original Environmental Assessment (National Environmental Consulting Services, 2005)

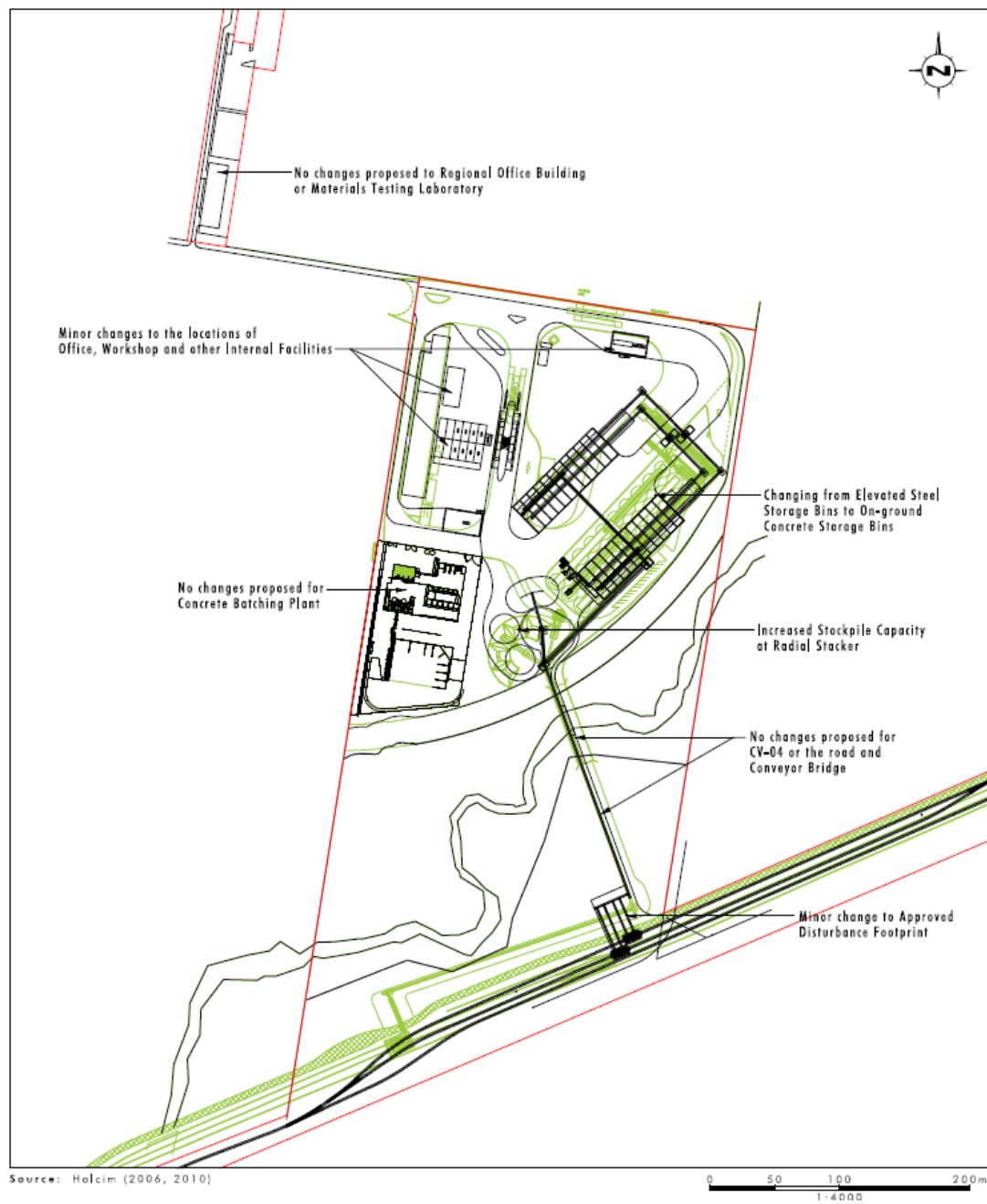


Figure 4.3 **Figure 3.3 from MOD1 Environmental Assessment (Umwelt 2010)**

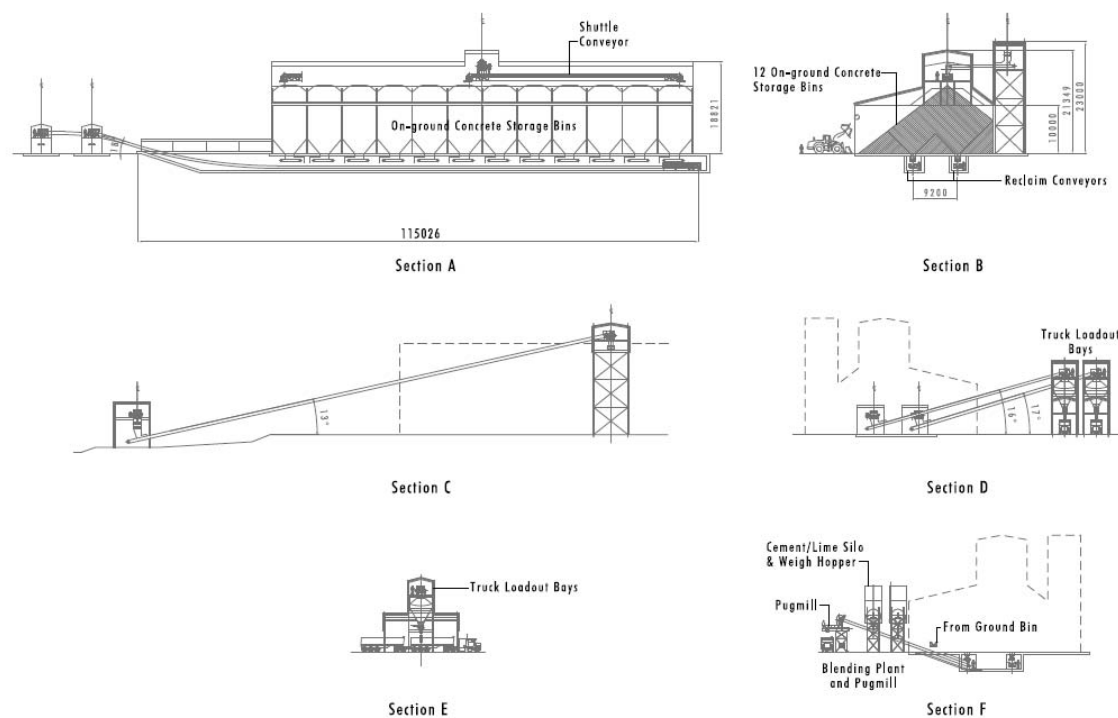


FIGURE 3.4

Indicative On-ground Concrete Storage Bin
and Truck Loadout Bay Sections

Note: Not to scale, dimension are in millimetres
File Name (A4): R02_V1/2802_037.dgn

Figure 4.4 Figure 3.4 from MOD1 Environmental Assessment (Umwelt 2010)



Image Source: Holcim (2017)
Data Source: LPI (2017)

Legend

- Approved RDC Site Boundary
- Approved Stockpile Area
- Proposed Stockpile Area

FIGURE 1.2
Proposed Additional Stockpile Area

Figure 4.5 Figure 1.2 from MOD2 Environmental Assessment (Umwelt, 2017)

4.4.1 Material handling, stockpiling and load-out

Holcim has advised that construction of the facility is being staged, with site components to be amended and refined in accordance with DA 05_0051 (as modified) are planned over the coming years. However, the original EA and those prepared for MOD1 and MOD2 do not describe a staged approach. In addition, the technical assessments, most importantly the air quality impact assessment, modelled fully enclosed conveyors and storage bins. This is a different dust emission scenario from open stockpiles and handling materials using front end loaders as has been implemented.

4.4.2 Concrete batching plant

The CBP was constructed during the audit period. There is not a construction certificate or an occupation certificate for the plant. The layout is substantially different from that described in the original EA and this layout has not been changed in subsequent modifications.

Holcim's advised that it considers the CBP to be a "temporary/mobile" plant, and plans to install a permanent CBP within the next two years. However, this does not remove the requirement for development approval for the CBP.

4.4.3 Impacts

The current site activities have a potential to increase dust emissions from the site compared to the project as approved. The 'medium' risk level has been assigned to the non-compliance because air quality monitoring results indicate that operations at the site have not resulted in serious or moderate environmental consequences. However, it cannot be ruled out that these components could have a moderate environmental impact in the future as the site arrangement has not been considered in the air quality assessments undertaken as part of the development consent application process.

4.5 Agency consultation

A letter was sent via email to relevant agencies between 20 and 22 November 2018 requesting comment on:

- any involvement that the agency had with the RHDC since the last audit on 31 March 2016;
- compliance of the RHDC with conditions relevant to the agency; and
- any general comments on the environmental performance of the RHDC.

An example of the letter requesting input to the audit is provided in Appendix E.

Agency responses are provided in Appendix F and are summarised in Table 4.4 along with audit responses.

Table 4.4 Summary of agency consultation

Agency	Agency response	Audit response
NSW Department of	DPE's email response received on 22 November 2017 indicated that the DPE did	Noted.

Table 4.4 Summary of agency consultation

Agency	Agency response	Audit response
Planning and Environment (DPE)	not have any specific comments regarding the RHDC.	
NSW Environment Protection Authority (EPA)	<p>EPA responded on 1 December 2017 noting the following:</p> <p>“On 25 November 2016, the Environment Protection Authority (EPA) received Holcim’s Annual Return for the reporting period 28 September 2015 – 27 September 2016 (No. 91234). The Annual Return requires the licensee to self-report on any non-compliances with licence conditions. The Annual Return reported two non-compliances, both relating to Special Condition E2 entitled “Noise Impact Verification”. The licensee failed to comply with conditions E2.1 and E2.3 which required the licensee to:</p> <ul style="list-style-type: none"> • undertake a noise verification monitoring program within three (3) months of commencement of operations at the premises (Condition E2.1); and • provide a report containing results of noise monitoring by the due date specified in the licence conditions (Condition E2.3). <p>On 13 January 2017, the EPA issued a Formal Warning in response to the abovementioned breaches of the licence conditions (Notice No. 154132).</p> <p>The EPA conducted a site inspection of the premises on 28 July 2016 as part of the EPA’s roll out of its new Risk Based Licensing approach and another site inspection on 23 March 2017. No breaches of licence conditions were identified during these site inspections.</p> <p>There have been no known breaches of Holcim’s licence conditions other than those outlined above. In addition, the licensee has reported no community complaints with regards to its operations at 21 Kellogg Rd, Rooty Hill and the EPA has not received any complaints with regards to the premises.”</p>	<p>Noted.</p> <p>The verification monitoring program was addressed in the previous audit and was recorded as an administrative non-compliance.</p>
NSW Roads and Maritime Services (RMS)	No response received.	-

Table 4.4 Summary of agency consultation

Agency	Agency response	Audit response
Crown Lands and Water Division, NSW Department of Primary Industries (DPI) – Water (DPI - Water)	<p>DPI – Water responded on 6 December 2017 requesting that the audit includes compliance with the conditions of consent relevant to any impacts on waterfront land and compliance with the Guidelines for Controlled Activities on Waterfront Land.</p> <p>This includes requirement to prepare and implement a Vegetation Management Plan and consult with Crown Lands and Water in the preparation of this plan and monitoring of its implementation.</p> <p>It is also requested that the audit considers assessment as to whether the project holds any required water entitlements and licences under the <i>Water Management Act 2000</i> or <i>Water Act 1912</i> (as applicable) and compliance with the conditions of any water licences/approvals held.</p>	<p>Construction works occurred within the Angus Creek Riparian Corridor. It is not known if a Controlled Activity Approval was obtained for the Stage 1 and 2 construction works. However, this activity was undertaken outside of the audit period.</p> <p>The CBP was constructed during the audit period.</p> <p>Recommendation: it should be determined if a Controlled Activity Approval is required for the CBP.</p> <p>A vegetation management plan has been prepared.</p> <p>The development consent or EPL do not require that the proponent consults with Crown Lands and Water regarding the vegetation management plan.</p> <p>The site does not extract groundwater or surface water and to the best of our knowledge does not hold any water licences.</p>
NSW Office of Environment and Heritage (OEH)	No response received.	-
Blacktown City Council (the council)	The council's email response received on 27 November 2017 indicated that their department has not had a significant level of involvement since the last audit on 31 March 2016. The council reviewed their records and there have been no reports of pollution events or public health risks at the premises since the abovementioned date.	Noted.
Western Sydney Parkland Trust (WSPT)	No response received	-

5 Audit summary

An independent environmental audit of the RHDC was undertaken to meet the requirements of Condition 3.5 of DA 05_0051. The audit period was from 31 March 2016 to 12 December 2017.

Audit evidence was collected during a site inspection on 12 December 2017 and documents provided by Holcim before and after the inspection.

The RHDC is currently in the operations phase, with a number of site components yet to be constructed. However, a CBP was constructed on the site during the audit period.

From the audit, it was evident that environmental management has been considered during the operations and construction of the RHDC. Particular attention has been given to water management practices and vegetation rehabilitation and management.

It was apparent during the site audit interviews that RHDC's environmental representative and site management generally have a good understanding of their environmental responsibilities and environmental issues on site. RHDC is generally well managed and appropriate environmental controls are in place.

However, given that materials handling and storage, and the CBP, are substantially different that approved, there are a number of issues that need to be rectified.

The following non-compliances with a 'medium' risk level were recorded:

- DA 05_0051 Conditions 1.1 and 2.8: the CBP and the aggregate storage areas are substantially different from the approved facilities.
- DA 05_0051 Condition 1.13: the CBP was constructed without a construction certificate and is being operated without an occupation certificate.
- A CEMP was not prepared or implemented for the construction of the CBP.

As a result of these items, there is a potential to increase dust emissions from the site compared to the project as approved. The 'medium' risk level has been assigned to the non-compliance because air quality monitoring results indicate that operations at the site have not resulted in serious or moderate environmental consequences. However, it cannot be ruled out that these components could have a moderate environmental impact in the future as the site arrangement has not been considered in the air quality assessments undertaken as part of the development consent application process.

The following non-compliances with a 'low' risk level were recorded:

- DA 05_0051 Conditions 2.11 and 2.12: truck associated with the facility were observed parked on Kellogg Road within 100 m of the site.
- DA 05_0051 Condition 3.2: there is no evidence that the Operational Monitoring Program has been reviewed on a six-monthly basis.

Four administrative non-compliances were also recorded.

Recommendations have been provided to address all non-compliances and a number of recommendations have been provided based on observations that were not related to non-compliances.

Appendix A

Development approval compliance register

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
1. Administrative Conditions	1.1	The Proponent must carry out the project generally in accordance with the: a) Project Application 05_0051; b) Environmental Assessment Report for the Proposed Regional Distribution Centre, Rooty Hill, volumes 1-3, prepared by National Environmental Consulting Services, dated October 2005; c) Response to Issues Raised in Submissions to EAR, prepared by National Environmental Consulting Services, dated February 2006; d) the final Statement of Commitments, submitted by the Proponent to the Department on 17 March 2006; and e) the Environmental Assessment Report - Proposed Minor Modification to Holcim Regional Distribution Centre (RDC), Rooty Hill, NSW prepared by Umwelt (Australia) Pty Limited, dated October 2010, including the Response to Submissions for Proposed Minor Modification to Holcim Regional Distribution Centre (RDC), Rooty Hill, NSW, dated 9 December 2010, and the March 2011 Modification Statement of Commitments shown in Attachment 2; f) the Environmental Assessment Report - Rooty Hill Regional Distribution Centre Minor Modification, prepared by Umwelt (Australia) Pty Limited and dated February 2017; including the Response to Submissions for Proposed Minor Modifications to Holcim Regional Distribution Centre (RDC), Rooty Hill, NSW, dated 16 May 2017; and f) the conditions of this approval. Note: The general layout of the project is shown in Attachment 3.	Notice of Modification, Section 75W of the <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act), 29 June 2017. Stockpile allowed by Mod 2 had not commenced at the time of EMM's site visit on 12 December 2017. A comparison of the original consent (DA 05_0051), Mod 1, Mod 2 and actual activities (refer to Table provided in Appendix C of the report) shows that material handling and stockpiling is substantially different from that approved. The concrete batching plant (CBP) and the adjacent aggregate storage area operated on site is substantially different from that shown in Figure 5.15 of the original environmental assessment report (Umwelt).	Non-compliant	The concrete batching plant (CBP) and the aggregate storage areas are substantially different from the approved facilities. See Section 4.4 for details. Recommendation: actions are taken to ensure that material storage and handling facilities, and the CBP, are constructed and operated as approved. This could be through: - amending existing site components and layout to comply with DA 05_0051 (as modified); and/or - seeking advice from relevant government agencies, including DPE and EPA, on achieving compliance with Condition 1.1 of DA 05_0051 (as modified).
	1.2	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this approval must prevail to the extent of any inconsistency.	Noted.	Note	
	1.3	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any reports, plans or correspondence that are submitted by the Proponent in accordance with this approval; and b) the implementation of any actions or measures contained in those reports, plans or correspondence submitted by the Proponent.	Holcim's Senior Environment and Community Liaison A. White and Site Manager - Rooty Hill R. Zammit (Holcim's audit team) confirmed during EMM's site visit, that there were no site requirements from the Secretary's office that have been issued within the current audit period (31 March 2016 to 12 December 2017).	Compliant	
	1.4	The Proponent must not distribute more than four million tonnes of construction materials (excluding concrete) a year from the site.	Weighbridge records (1 January 2016 to 12 December 2017) confirm less than 2 million tonnes of material being distributed per year.	Compliant	
	1.5	The production capacity of the concrete batching plant must not exceed 200,000 cubic metres per year.	Concrete production for the 2017 (the only almost complete year in the audit period, 31 March 2016 to 12 December 2017) was 52,568 m ³ .	Not verified	Verbal evidence - the RHDC concrete batching plant (CBP) commenced operation on 13 December 2016.
	1.6	Apart from the delivery of materials associated with the concrete batching plant, and special products, the Proponent must only receive construction materials at the site by rail, unless otherwise approved by the Secretary on a case-by-case basis. The Secretary's approval to receive materials at the site other than by rail must only be granted with adequate demonstration by the Proponent that exceptional circumstances exist.	Audit observations and physical inspection confirms material enters site by rail only. The delivery of materials associated with the newly constructed CBP is via road.	Compliant	
	1.7	This approval must lapse five years after the date on which it is granted, unless the works the subject of this approval are physically commenced on or before that time.	Site observations.	Compliant	Construction and operation of the CBP have commenced. Holcim has advised that the current CBP is of 'temporary/mobile' nature.
	1.8	With the approval of the Secretary, the Proponent may prepare and submit any management plan or monitoring program required by this approval on a progressive basis. Where a management plan or monitoring program is required before carrying out the project, or any stage of the project, the plans/ programs may be prepared and submitted in relation to either discrete components of the project or for a specified time period.	-	Compliant	Noted. See conditions below in regard to specific conditions for preparation and submission of management plans.

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	1.9	Prior to the commencement of construction, the Proponent must identify (including, but not limited to the position and level of service) all public utility services on the site, roadway, footpath, public reserve or any public areas that are associated with, and/or adjacent to the site, and/or likely to be affected by the construction and operation of the project.	Services Plan Lot 1 in DP 1150066 Holcim Aggregates Facility Project. Rooty Hill, 11 August 2015 was sighted.	Compliant	During the site visit, Holcim's audit team confirmed that two plans with public utility services were referred to, prior to, and during the recent construction of the CBP. Services Plan Lot 1 in DP 1150066 Holcim Aggregates Facility Project. Rooty Hill, 11 August 2015, shows stormwater structures, overhead power and under ground electricity, fire main line, sewer, water main and recycled main, Railcorp underground HV power and 132 KV high voltage line towers. Additionally, the location of the gas main was identified on the same plan (Sheet 6) passing under the Main Western Railway well over 600 m from the CBP.
	1.10	The Proponent must consult with the relevant utility provider(s) for those services identified under condition 1.9 and make reasonable arrangements to adjust and/or relocate services as may be required as a result of undertaking the project. The Proponent must bear the full cost associated with providing utilities and services to the site, and restoring any public infrastructure that may be damaged as a result of the project.	-	Not triggered	No services identified.
	1.11	Prior to the commencement of construction works that may affect services/utilities, the Proponent must provide documentary evidence to the Secretary that the reasonable requirements of the relevant utility provider(s) have been met.	-	Not triggered	No services identified.
	1.12	Prior to the commencement of construction of the project, the Proponent must undertake a Final Hazard Analysis based on the detailed design of the project and with a particular focus on risks associated with the Sydney to Newcastle Natural Gas Pipeline. The Final Hazard Analysis must be undertaken in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis (DUAP, 1997) and AS2885 Pipelines - Gas and Liquid Petroleum – Operation and Maintenance. The Final Hazard Analysis must be submitted for the approval of the Secretary prior to the commencement of construction works.	Letter from Department of Planning and Infrastructure (6 September 2015), Hazard Analysis approved.	Compliant	
	1.12A	Prior to the issue of a construction certificate, the Proponent is to pay \$177,644.00 to - Blacktown City Council for Infrastructure enhancement with Blacktown local government area.	Sighted receipt from Blacktown City Council (245378 20 July 2011) for payment of \$177,644.00.	Compliant	
	1.13	The Proponent must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA. Notes: Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the Project.	Sighted, construction certificates from Building Certification company Mott McDonald (9 August 2011). Certification certificates from Philip Chun (23 December 2015), Lyndsay Dynan (21 May 2015), Techbuild Consulting (17 September 2015)	Non-compliant	The CBP was constructed without seeking a construction certificate. It is being operated without seeking an occupation certificate. Holcim's advised that it considers the CBP to be a 'temporary/mobile' plant, and plans to install a permanent CBP within the next two years. However, this does not remove the requirement for development approval for the 'temporary/mobile' CBP. Recommendation: advice is sought from DPE regarding addressing this non-compliance.
2. Specific Environmental Conditions	2.1	The Proponent must minimise noise emissions from plant and equipment operated on the site in relation to the project by installing and maintaining, wherever reasonable and practicable, efficient silencers, low-noise mufflers (residential standard) and replacement of reversing alarms with alternative measures, such as flashing lights.	Noise audit undertaken in February 2016 undertaken by Golders Associates identified no exceedences. One area identified as being of risk (adjacent conveyor and rail loader), site audit observations confirm conveyor hood attached to further reduce noise in this area.	Compliant	
	2.1A	In order to minimise sleep disturbance, the Proponent must operate all shunting to and from the project by groups of rigidly-connected wagons (rakes) or other appropriate technology approved by the Secretary.	Photographic evidence provided during site audit that all shunting is undertaken with rigidly-connected wagons.	Compliant	

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)																																																
	2.2	The Proponent must only undertake construction activities associated with the project, that are audible at any residential receptor, between the following hours: a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive; b) 8:00 am to 1:00 pm on Saturdays; and c) at no time on Sundays or public holidays.	INX register.	Not verified	The bulk of the RHDC was constructed prior to the audit period. Database search of Holcim's internal complaints register system INX and agency consultation with government agencies (including responses from the EPA, Blacktown Council and DPE) show no evidence of community complaints during the CBP construction activities.																																																
	2.3	The Proponent must design, construct, operate and maintain the project to ensure that the noise contributions from the project to the background acoustic environment do not exceed the maximum allowable noise contributions specified in Table 1, at those locations and during those periods indicated. Table 1: Noise Criteria <table border="1"> <thead> <tr> <th>Location</th><th>Morning Shoulder (6am – 7am Monday to Saturday and 6am – 8am Sundays and Public Holidays)</th><th>Day 7am – 6pm Monday to Saturday and 8am – 6pm Sundays and Public Holidays</th><th>Evening 6pm – 10pm Monday to Sunday</th><th colspan="2">Night 10pm – 7am Monday to Saturday and 10pm – 8am Sunday</th></tr> <tr> <th></th><th>L_{Aeq}(15 minute) (dB(A))</th><th>L_{Aeq}(15 minute) (dB(A))</th><th>L_{Aeq}(15 minute) (dB(A))</th><th>L_{Aeq}(15 minute) (dB(A))</th><th>L_{A1}(1 minute) (dB(A))</th></tr> </thead> <tbody> <tr> <td>Any residences in Station Street</td><td>39</td><td>44</td><td>44</td><td>39</td><td>53</td></tr> <tr> <td>Any Residences in Crawford Road</td><td>40</td><td>40</td><td>39</td><td>39</td><td>53</td></tr> <tr> <td>Any residences in Mavis Street</td><td>35</td><td>35</td><td>35</td><td>35</td><td>53</td></tr> <tr> <td>Nurragingy Reserve</td><td colspan="5">When the Reserve is in use – L_{Aeq} 50 dB(A)</td></tr> <tr> <td>Colebee Centre</td><td colspan="5">When the Centre is in use – L_{Aeq} 50 dB(A)</td></tr> <tr> <td>Blacktown Olympic Park (active recreation areas)</td><td colspan="5">When active recreational areas of the Park are in use – L_{Aeq} 55 dB(A)</td></tr> </tbody> </table>	Location	Morning Shoulder (6am – 7am Monday to Saturday and 6am – 8am Sundays and Public Holidays)	Day 7am – 6pm Monday to Saturday and 8am – 6pm Sundays and Public Holidays	Evening 6pm – 10pm Monday to Sunday	Night 10pm – 7am Monday to Saturday and 10pm – 8am Sunday			L _{Aeq} (15 minute) (dB(A))	L _{Aeq} (15 minute) (dB(A))	L _{Aeq} (15 minute) (dB(A))	L _{Aeq} (15 minute) (dB(A))	L _{A1} (1 minute) (dB(A))	Any residences in Station Street	39	44	44	39	53	Any Residences in Crawford Road	40	40	39	39	53	Any residences in Mavis Street	35	35	35	35	53	Nurragingy Reserve	When the Reserve is in use – L _{Aeq} 50 dB(A)					Colebee Centre	When the Centre is in use – L _{Aeq} 50 dB(A)					Blacktown Olympic Park (active recreation areas)	When active recreational areas of the Park are in use – L _{Aeq} 55 dB(A)					AEMR for 1 October 2015 to 30 September 2016 (dated 28 September 2016). AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018). INX register.	Compliant	No noise exceedences of the operational noise criteria as a result of site operations were reported during the audit period. No noise complaints were registered.
Location	Morning Shoulder (6am – 7am Monday to Saturday and 6am – 8am Sundays and Public Holidays)	Day 7am – 6pm Monday to Saturday and 8am – 6pm Sundays and Public Holidays	Evening 6pm – 10pm Monday to Sunday	Night 10pm – 7am Monday to Saturday and 10pm – 8am Sunday																																																	
	L _{Aeq} (15 minute) (dB(A))	L _{Aeq} (15 minute) (dB(A))	L _{Aeq} (15 minute) (dB(A))	L _{Aeq} (15 minute) (dB(A))	L _{A1} (1 minute) (dB(A))																																																
Any residences in Station Street	39	44	44	39	53																																																
Any Residences in Crawford Road	40	40	39	39	53																																																
Any residences in Mavis Street	35	35	35	35	53																																																
Nurragingy Reserve	When the Reserve is in use – L _{Aeq} 50 dB(A)																																																				
Colebee Centre	When the Centre is in use – L _{Aeq} 50 dB(A)																																																				
Blacktown Olympic Park (active recreation areas)	When active recreational areas of the Park are in use – L _{Aeq} 55 dB(A)																																																				
	2.4	For the purpose of assessment of noise contributions specified under condition 2.3 of this approval, noise from the project must be a) measured at the most affected point on or within the residential boundary, or at the most affected point within 30 metres of the dwelling (where the dwelling is more than 30 metres from the boundary) to determine compliance with L _{Aeq} (15 minute) noise limits; or b) measured at 1 metre from the dwelling façade to determine compliance with LA1(1 minute) noise limits.	AEMR for 1 October 2015 to 30 September 2016 (dated 28 September 2016). AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018).	Compliant	Noise measurements taken from approved locations identified within the noise audit (February 2016).																																																
	2.5	Notwithstanding condition 2.4 of this approval, should direct measurement of noise from the project be impractical, the Proponent may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the EPA Industrial Noise Policy). Details of such an alternative noise assessment method accepted by the EPA must be submitted to the Secretary prior to the implementation of the assessment method. Section 4 of the Industrial Noise Policy must also apply to the measured noise levels, where applicable.	Operational noise monitoring report, Jacobs, 10 May 2016 (1 April to 30 June 2016 (Q2)). Operational noise monitoring report, Jacobs, 26 April 2016 (1 January to 31 March 2017 (Q1)).	Compliant	Noise measurements taken from approved locations identified within the noise audit (February 2016).																																																
	2.6	Noise emission limits specified under condition 2.3 apply under the following meteorological conditions: a) wind speed up to 2ms-1 at 10 metres above ground level; or b) temperature inversion conditions of up to 3°C/100m and wind speed up to 2ms-1 at 10 metres above the ground.		Note																																																	

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	2.7	<p>Prior to the commencement of operations at the site, the Proponent must prepare and implement an Operational Noise Management Protocol for the project. The Protocol must include, but not necessarily be limited to:</p> <p>a) a principal requirement to satisfy the limits specified in condition 2.3 of this approval at all times, including to the extent that is reasonable and practical, acoustic considerations in the detailed design of the project;</p> <p>b) a system that allows for periodic assessment and reasonable implementation of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA) to minimise noise impacts over the life of the proposal;</p> <p>c) a system of regular auditing to ensure the effective implementation and maintenance of mitigation measures required to achieve the noise limits specified in condition 2.3 of this approval. Acoustic auditing must be conducted by an appropriate and recognised acoustic engineer, who is independent of, or not associated with, any organisation that has been involved with the acoustic assessment of the application (the subject of this approval), or involved in any supervision or designs associated with the construction of the project.</p>	Operational Environmental Management Plan (Final v1 OEMP, 16 September 2015) - Appendix B (Noise Management Plan) and Appendix C (Operational Noise Management Protocol).	Compliant	<p>Appendix B and C of Operational Environmental Management Plan (Final v1 OEMP, 16 September 2015), satisfies this criterion.</p> <p>Appendix B provides a Noise Management Plan in which Appendix C is the Operational Noise Management Protocol.</p> <p>An audit program is included within the OEMP - internal audits (undertaken by Holcim and measured against national standards), and external audits (at six months, two years and as directed by the conditions of approval/Secretary.</p>
	2.7	The Protocol must be incorporated into the Operational Environmental Management Plan, required under condition 5.4 and condition 5.5 of this approval. The results of any assessment and auditing under the Protocol must be reported in the Annual Review (refer to condition 6.3 of this approval).	Annual Environmental Management Review (AEMR) prepared for the period 1 October 2015 to 30 September 2016 (dated 28 September 2016). Chapter 6.0 Environmental Performance, Section 6.1.	Compliant	
	2.7	A copy of the Protocol must be submitted to EPA and the Secretary prior to the commencement of operations at the site.	<p>Letter (17 August 2015), reference Howard Reed, advising of approval for the OEMP and the commencement of operations.</p> <p>Operational Environmental Management Plan (Final v1 OEMP, 16 September 2015).</p>	Compliant	
	2.8	<p>The Proponent must design, construct, commission, operate and maintain the project in a manner that minimises dust emissions from the site, as specified in paragraph of the final Statement of Commitments submitted by the Proponent to the Department on 17 March 2006, including:</p> <p>a) all dust control systems for transfer, load out and unloading points, as well as materials handling activities must be designed and operated to comply with a solid particles emission limit of 20 mgm⁻³ as required by Part 4 of the Protection of the Environment (Clean Air) Regulation 2002;</p> <p>b) all storage bins must be enclosed;</p> <p>c) water spray systems must be installed to service all stockpiles;</p> <p>d) all paved trafficable areas must be swept as required by a permanently stationed street sweeper to minimise dust.</p> <p>e) the application of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA), where reasonable and practicable, to minimise dust impacts during construction and operation of the project.</p>	Site observations.	Non-compliant	<p>The majority of these measures are complied with, however all storage bins are not enclosed. This is addressed in regards to Condition 1.1.</p> <p>Recommendation: see Condition 1.1.</p>

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)																		
	2.8A	<p>The Proponent must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedences of the criteria in Table 2 at any residence on privately-owned land.</p> <p>Table 2: Air quality criteria</p> <table><tr><th>Pollutant</th><th>Averaging Period</th><th>Criterion</th></tr><tr><td>Particulate matter < 10 µm (PM₁₀)</td><td>Annual</td><td>^{a,d}25 µg/m³</td></tr><tr><td>Particulate matter < 10 µm (PM₁₀)</td><td>24 hour</td><td>^{b,d}50 µg/m³</td></tr><tr><td>Particulate matter < 2.5 µm (PM_{2.5})</td><td>Annual</td><td>^{a,d}8 µg/m³</td></tr><tr><td>Particulate matter < 2.5 µm (PM_{2.5})</td><td>24 hour</td><td>^{b,d}25 µg/m³</td></tr><tr><td>Total suspended particulates (TSP)</td><td>Annual</td><td>^{a,d}90 µg/m³</td></tr></table> <p><i>Note:</i> "Reasonable and feasible avoidance measures" includes, but is not limited to, the operational requirements in conditions 2.8, 3.1(b) and 5.3(d) to develop and implement an air quality management system that ensures operational responses to the risks of exceedance of the criteria.</p> <p><i>Notes to Table 3:</i> ^a Cumulative impact (ie increase in concentrations due to the development plus background concentrations due to all other sources). ^b Incremental impact (ie increase in concentrations due to the development alone, with zero allowable exceedances of the criteria over the life of the development). ^c Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method. ^d Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents or any other activity agreed by the Secretary.</p>	Pollutant	Averaging Period	Criterion	Particulate matter < 10 µm (PM ₁₀)	Annual	^{a,d} 25 µg/m ³	Particulate matter < 10 µm (PM ₁₀)	24 hour	^{b,d} 50 µg/m ³	Particulate matter < 2.5 µm (PM _{2.5})	Annual	^{a,d} 8 µg/m ³	Particulate matter < 2.5 µm (PM _{2.5})	24 hour	^{b,d} 25 µg/m ³	Total suspended particulates (TSP)	Annual	^{a,d} 90 µg/m ³	<p>AEMR for the period 1 October 2015 to 30 September 2016 (dated 28 September 2016).</p> <p>AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018).</p>	Compliant	<p>Holcim operate two HVAS PM₁₀ monitors for the site. One (PM₁₀ 1) is on site, west of the stockpile area. A second (PM₁₀ 2) is installed in the northern part of the Blacktown International Sportspark that is south of the RHDC site.</p> <p>The available monitoring reports did not cover the entire audit period (31 March 2016 to 12 December 2017).</p> <p>The March to June 2016 monthly air quality reports have a figure showing the monitor "PM10 2" in the Blacktown International Sportspark (also called the Blacktown Sports Centre (BSC)). This is labelled as HVAS Unit 1 (BSC) in the Table 2 of the monthly reports. It is assumed that the table is correctly labelled.</p> <p>Only the results from the HVAS in the Blacktown International Sportspark have been considered in determining compliance. All 24-hour PM₁₀, annual PM₁₀ and annual TSP results were below the applicable criteria with the exception of on 9 December 2016 when a PM10 concentration of 64.3 ug/m³ was recorded at the Blacktown International Sportspark. However, the prevailing wind at the time of sampling were not from the RHDC site.</p> <p>The monthly air quality reports pre-date the approval of MOD 2. They do not report PM_{2.5} and use a annual PM10 criteria of 30 ug/m³. These should be updated in future reports to match the current consent.</p> <p>The internal complaints reporting system INX shows no breaches of licences and permits, community complaints regarding this condition.</p>
	Pollutant	Averaging Period	Criterion																				
	Particulate matter < 10 µm (PM ₁₀)	Annual	^{a,d} 25 µg/m ³																				
	Particulate matter < 10 µm (PM ₁₀)	24 hour	^{b,d} 50 µg/m ³																				
	Particulate matter < 2.5 µm (PM _{2.5})	Annual	^{a,d} 8 µg/m ³																				
	Particulate matter < 2.5 µm (PM _{2.5})	24 hour	^{b,d} 25 µg/m ³																				
	Total suspended particulates (TSP)	Annual	^{a,d} 90 µg/m ³																				
	2.9	All trafficable areas and vehicle manoeuvring areas on the site must be maintained in a condition that will minimise the generation or emission of wind blown or traffic generated dust from the site at all times.	Site observations.	Compliant	All trafficable and manoeuvrable areas are sealed, apart from the new storage/stockpile area near the concrete batching plant. These areas are, however, maintained daily. A vehicle wheel wash is installed to remove particulate matter from vehicles tyres prior to departure from site. All concrete mixing trucks are completely hosed down before leaving the site.																		
2.10	Heavy vehicles entering and leaving the site that are carrying loads must be covered at all times, except during loading and unloading activities.	Site observations.	Compliant	EMM audit team's observation of onsite truck activity during the site visit showed that all trucks use of automated cover systems. Product containers are covered before trucks leave the site boundary.																			
2.11	The Proponent must take reasonable measures to ensure that heavy vehicles accessing the site must not queue within the adjacent local road network.	Site observations.	Non-compliant	<p>Truck associated with the facility were observed parked on Kellogg Road within 100 m of the site.</p> <p>Recommendation: it should be ensured that no trucks are queuing or parking along the local road network at any time.</p>																			
2.12	The Proponent must take reasonable measures to ensure that vehicles used for the construction and/or operation of the project must not park on local roads in the vicinity of the project at any time.	Site observations.	Non-compliant	See Condition 2.11.																			
2.13	The Proponent must design and construct all internal roads, including associated loading bays, car parking facilities, driveways, ramp grades, turn paths, sight distances and aisle widths, in accordance with relevant RMS and Council codes, including AS 2890.1 – 2004 and AS 2890.2 – 2002.	<p>Sighted, Mott McDonald certified design drawings (15/10/12), all construction undertaken generally in accordance with the approved design drawings.</p> <p>However, compliance of internal access roads within the CBP has not been verified.</p>	Not verified																				
2.14	The Proponent must clearly mark all visitor, disabled, ambulance and service vehicle parking areas.	Site observations.	Compliant																				
2.15	The Proponent must seek approval from Rail Corporation New South Wales for the allocation of freight train paths into and out of the site from the Main Western Line.	Email correspondence from Pacific National (Peter Lew) dated 25 June 2014 providing approval for freight rail paths.	Compliant																				

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	2.16	The Proponent must negotiate with the owner of the OneSteel site to use that land for access to the southern sections of the project site for the construction of the Angus Creek road bridge. Should the Proponent and the owner of the OneSteel site be unable, after reasonable attempts, to negotiate for access through that site, the Proponent may seek the Secretary's agreement to access the project site via the Knox Road/Nurraringy Reserve access point. In seeking the Secretary's agreement, the Proponent must demonstrate to the Secretary's satisfaction that it has applied all reasonable endeavours to negotiate an outcome that avoids the use of the Knox Road/Nurraringy Reserve access point.	-	Not triggered	Access from One steel site was not able to be negotiated. Regardless the access from the Knox Road/Nurraringy Reserve was not required for construction purposes.
	2.16	Note: The environmental impacts associated with the use of both access points have been assessed and are considered to be acceptable in both cases. However, the use of the OneSteel site for construction access is considered to pose reduced residual environmental impacts, and is therefore the preferred outcome. If the Knox Road/ Nurraringy Reserve access is utilised, residual environmental and public safety impacts must be comprehensively managed, as required under the conditions of this consent.	-	-	
	2.17	In the event that the Secretary agrees under condition 2.16 to site access for the construction of the project via the Knox Road/ Nurraringy Reserve access point, the Proponent must limit vehicles using that access point to 40 vehicle movements per day (20 round trips per day) until the completion of the Angus Creek road bridge. Once the road bridge has been constructed, access to the site during construction must be restricted to via Kellogg Road.	-	Not triggered	See Condition 2.16
	2.18	In the event that the Secretary agrees under condition 2.16 to site access for the construction of the project via the Knox Road/ Nurraringy Reserve access point, the Proponent must develop, in consultation with Council, a Construction Access Management Program to comprehensively mitigate and manage impacts associated with construction access via Knox Road/ Nurraringy Reserve. The Program must include, but necessarily be limited to: a) scheduling of vehicle movements to avoid peak public usage times within the Reserve; b) vehicle access, speed, route and manoeuvring requirements to apply to traffic passing through the Reserve to ensure public safety, minimisation of dust generation, minimisation of traffic noise impacts and the protection of flora and fauna; c) arrangements for surveys of existing road infrastructure standards within Knox Road/Nurraringy Reserve before and after use of the infrastructure for site access; d) arrangements for funding and implementation of ameliorative works should surveys of road infrastructure indicate a deterioration in the standard of the infrastructure as a result of construction vehicle access; e) consideration of pavement strengthening/ repairs of the access route and the structural stability of the causeway over Eastern Creek, prior to use; f) consideration of widening and/or appropriate traffic management to ensure safe passing opportunities; and g) the cost of the works required as part of the Program to be borne by the Proponent.	-	Not triggered	See Condition 2.16
	2.18	The Proponent must submit the Program to the Secretary for approval prior to the use of the Knox Road/ Nurraringy Reserve access point.	-	Not triggered	
	2.19	Access to the site during operation of the project must be via Kellogg Road and Woodstock Avenue. Access to the site via North Parade must be for maintenance purposes or emergency access only.	Site observations.	Compliant	
	2.20	Prior to the commencement of operations of the project, the Proponent must upgrade the intersection of Kellogg Road and Woodstock Avenue by constructing a one-lane roundabout capable of accommodating B-double vehicles, or by installing traffic signals, in accordance with the relevant standards. The Proponent must carry out and pay 100% of the cost of the design and construction works for the roundabout (or traffic signalisation) and, if any, the full cost of any land acquisition necessary in order to carry out the works.	Letter from Blacktown City Council (construction contractor) (14 November 2013), reference Nadeem Shaikh, confirming agreement for the full payment of the works for the Kellogg Road upgrade and the Power Street/Glendenning Road roundabout.	Compliant	

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	2.20A	<p>Subject to condition 2.20, prior to commencement of construction of the project, the Proponent must develop, in consultation with Council and RMS a schedule for the implementation of road upgrades necessary for the implementation of the project, as specified under this approval and the EAR and as amended by the conditions of this approval. The schedule must include but not necessarily be limited to:</p> <p>a) timing and coordination of the road works recommended in section 7.10 of the EAR for the project, having regard to the timing for implementation of the project, coordination of all road works to minimise conflict with other road users;</p> <p>b) provision for the finalisation of detailed design of road works, in consultation with Council and the RMS, and in accordance with relevant design guides and criteria specified by those parties;</p> <p>c) design of operational access routes to the site to cater for B-Double vehicles where appropriate and in accordance with RTA Road Design Guide and the AUSTROADS Pavement Design Guide;</p> <p>d) arrangements for the funding of road works by or on behalf of the Proponent, fully reflecting the percentage of heavy road traffic contributed by the project to site access routes; and</p> <p>e) with respect to Kellogg Road:</p> <p>i) an independent assessment of the condition of the pavement and the pavement life for the travel lanes In Kellogg Road must be undertaken by a road pavement specialist;</p> <p>ii) the required pavement works and cost to upgrade the road pavement for the current traffic volumes using over lanes In Kellogg Road over the design life (typically 20 years) must be determined;</p> <p>iii) the required pavement works and cost to upgrade the road pavement for the current traffic volumes plus traffic generated by the project using travel lanes over the design life (typically 20 years or the same design life as adopted for (ii) must be determined; and</p> <p>iv) the Proponent must pay the difference in costs for the works required under (ii) and (iii) above</p> <p>f) provision for the appointment of an independent civil or traffic engineer to certify the adequacy of road works design (consistent with this condition) and the adequacy of the</p>	Correspondence from Blacktown City Council (28 July 2011) that this condition has been satisfied. Receipt provided from Blacktown City Council (22 April 2015) for the amount of \$273,082.00 being the works and maintenance contribution for Kellogg Road.	Compliant	
	2.20A	In the event of any dispute with respect to the scope or content of the schedule for implementation of road upgrades, relocations and replacements, or the detailed design of the road works, the dispute must be referred to the Secretary, whose determination of the dispute must be final and binding on all parties.	-	Not triggered	
	2.21	<p>Prior to the commencement of operations, the Proponent must prepare and implement a Traffic Noise Management Strategy for the project. The Strategy must be designed to ensure best practice noise management strategies for vehicle movements associated with the project to minimise noise generated by heavy vehicles movements. The Strategy must include, but not necessarily be limited to, the following:</p> <p>a) measures to ensure that the commitments for minimising/managing traffic noise as identified in the EAR and supporting information submitted to the Department for the project are effectively implemented. This must include the incorporation of these requirements in contractual agreements made by the Proponent;</p> <p>b) a program of driver training to ensure that drivers are aware of route restrictions applicable to the project and to ensure that noisy vehicle practices are not undertaken during approach or departure from the site, including the restriction/prohibition on the use of compression engine brakes;</p> <p>c) a scheme of fleet selection and maintenance that reflects best noise practice/technology as far as practicable;</p> <p>d) measures to ensure the flexible scheduling of movements to reduce impacts on residential areas during sensitive times of the day and night;</p> <p>e) communication and management strategies for heavy vehicles associated with the project (including those not owned by the Proponent) to ensure the requirements of the Strategy are met;</p> <p>f) a community consultation program, including a complaints line for the community to report movements that do not abide by the Strategy (refer to condition 4.2 and condition 4.4 of this approval);</p> <p>g) the incorporation of an audit and monitoring program for the Strategy to determine compliance with the Strategy by heavy vehicles associated with the project and to evaluate the effectiveness of strategy in minimising traffic noise (refer to condition 3.1i) of this approval).</p>	The Operational Environmental Management Plan dated 16 September 2015 (OEMP) includes a Traffic Noise Management Plan (TMP) that describes measures addressing points a-g of this condition. The Traffic Noise Management Strategy is included in Appendix D of the OEMP.	Compliant	

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	2.21	The Proponent must not commence operations until the Secretary has approved the Traffic Noise Management Strategy. The Strategy must be incorporated into the Operational Environmental Management Plan for the project (refer to condition 5.4 and condition 5.5 of this approval). The Proponent must implement the management strategy as approved from time to time by the Secretary.	Letter from the DPE approving the OEMP, which includes the TMP, dated 19 October 2015.	Compliant	
	2.21A	<p>The number of on-site and truck parking spaces to be provided for the project must be in accordance with sections 5.4.3, 5.4.4 and 5.4.6 of the EAR as follows:</p> <p>a) truck parking: 50 spaces (truck and dog configuration);</p> <p>b) car parking: a total of 310 spaces on the project site and Humes site, as follows:</p> <p>i) project site: 121 spaces</p> <p>ii) Regional office and laboratory: 189 spaces, of which 84 are to be allocated to the project site staff and visitors and 105 are to be allocated to the staff and visitors to the existing Humes site;</p> <p>c) all car parking spaces must be marked/signposted in accordance with the above allocations. All visitor spaces must be located conveniently in relation to the various administrative offices on the site and must be clearly marked and signposted.</p> <p>d) all car and truck parking spaces must be sealed in a hardstanding material and drained in accordance with the approved stormwater management plan for the project;</p> <p>e) the design and dimensions of all truck and car parking spaces, together with all associated roads and manoeuvring areas, must be in accordance with AS2890.2 (2002);</p> <p>f) a detailed car and truck parking plan, at a scale of 1:200, and incorporating the above requirements, must be submitted for the approval of the Secretary prior to the commencement of any works.</p>	Site observations.	Administrative non-compliance	<p>This condition has not been met at this stage, as construction of all approved components (eg laboratory) had not been completed on the date of the site audit on 12 December 2017. The status on the date of the site audit was:</p> <ul style="list-style-type: none"> • there are approximately 14 delineated truck (and dog) parking spaces currently, with some provision for more parking once construction of the remaining components are completed; • there are approximately 38 delineated car parking spaces provided adjacent the site office/administration; • all light vehicle parking spaces are clearly delineated, • all parking areas sealed and drained to the site stormwater system; • there are no dedicated parking spaces for trucks in the CBP area; and • truck and vehicle turning and manoeuvring areas appear to be constructed in accordance with the AS2890.2 (2002). <p>A letter from Department of Planning and Infrastructure (7 December 2012, ref - 10/22440) approves truck and car space requirement reductions, however this predates the MOD2 condition.</p> <p>Holcim is reducing its vehicle fleet and using contractor-owned and contractor-operated heavy vehicles - these do not park at the RHDC.</p> <p>Based on staff numbers and site observations, there are adequate light vehicles spaces on the site currently.</p> <p>It is understood that Holcim do not propose to develop the Regional office and laboratory site. There the 189 spaces will not be required.</p> <p>Recommendation: the number of required parking sites should be modified.</p>
	2.22	The Proponent must minimise any clearing of vegetation in carrying out of the project, consistent with a Vegetation Management Plan developed to the satisfaction of the DPI Water and OEH under condition 2.24 of this approval.	Site observations.	Compliant	<p>Holcim's audit team confirmed during the site visit that vegetation clearing activities were not undertaken for the purpose of constructing the CBP. This accords with previous observations of the area.</p> <p>Site audit observations confirmed vegetation clearing has not progressed in areas not designated and are in accordance with the Vegetation Management Plan (August 2011, SKN Final version 0).</p>
	2.23	Prior to the commencement of any earthworks or vegetation clearing at the site, vegetation to be protected is to be fenced off with clearly visible, durable, and appropriately signposted exclusion fencing in accordance with any specific requirements identified in the Vegetation Management Plan prepared under condition 2.24.	Site observations.	Compliant	Exclusion fencing observed during the site audit inspection.
	2.24	Prior to the commencement of any construction activities, the Proponent must prepare and implement to the satisfaction of the DPI Water and OEH, a Vegetation Management Plan in accordance with the NOW's guidelines How to Prepare a Vegetation Management Plan – Version 4 and Watercourse and Riparian Zone Rehabilitation Requirements as well as OEH Recovering Bushland on the Cumberland Plain. The Plan must include drawings that clearly show vegetation to be retained/removed, plant material to be used for rehabilitation, densities and species mix for areas to be rehabilitated, establishment methods, sequencing of tasks, maintenance and performance monitoring. Site rehabilitation and maintenance is to be carried out in accordance with the Plan, and the DPI Water is to be advised of the person responsible for any seed or vegetative propagation prior to the commencement of that propagation. The proponent must implement the management plan as approved from time to time by the Secretary.	RHDC Vegetation Management Plan (August 2011, SKN Final version 0).	Compliant	The RHDC Vegetation Management Plan (August 2011, SKN Final version 0) and approved OEMP address the criteria in terms of vegetation to be retained/removed, plant material to be used for rehabilitation, densities and species mix for areas to be rehabilitated, establishment methods, sequencing of tasks, maintenance and performance monitoring, as well as vegetation propagation.

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	2.25	All rehabilitated and revegetated areas of the site must be maintained and monitored for a period of at least five years after final planting, or where other revegetation methods are used, five years from when plants are of tube stock size and are at the densities specified in the Vegetation Management Plan. Maintenance must include sediment and erosion control, watering, weed control, replacement of plant losses, disease and insect control, protection from any mowing or slashing on adjacent land, mulching and any other requirements necessary for achieving successful vegetation establishment.	Site observations. Master data_Terrestrial ecology spreadsheet which documents biometric data from Spring 2012 to Summer 2017. Quarterly Environmental Monitoring Report, Jacobs 31 July 2017.	Compliant	Planting is ongoing and is being monitored.
	2.26	Immediately after completion of initial planting/seeding and every year thereafter for the duration of the maintenance period the Proponent must submit to the Department a monitoring report addressing the performance criteria as specified in the Vegetation Management Plan, and comment on the stability and condition of any stream works. With each monitoring report, the person responsible for implementing the Vegetation Management Plan must certify in writing that plantings (including follow-up plantings) have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.	Quarterly Environmental Monitoring Report, Jacobs 31 July 2017.	Administrative non-compliance	It is unknown whether the required monitoring report has been submitted to DPE. Recommendation: the monitoring reports should be submitted to DPE, including certification that plantings (including follow-up plantings) have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.
	2.27	Prior to the commencement of any part of the construction works that will result in the removal of the endangered ecological communities of the Cumberland Plain Woodland a compensatory habitat package must be established in consultation with the OEH. The package must include one or more of the following compensatory measures: a) provision of no less than 3 hectares of compensatory habitat comprising of Cumberland Plain Woodland, whether new or restored, for every 1 hectare of "Core Habitat" or "Support to Core" habitat impacted; or b) equivalent financial contribution to a rehabilitation project in the Blacktown local government area; or c) any other form of compensatory habitat agreed by the OEH.	Letter from Western Sydney Parklands Trust (5 July 2011), reference Yoland Gil, advising acceptance of \$277,350.00 as a compensatory habitat package.	Compliant	
	2.27	In the event of any dispute with respect to the scope or content of the compensatory habitat package, the dispute must be referred to the Secretary, whose determination of the dispute must be final and binding on all parties.	-	Not triggered	
	2.28	Nothing in this approval precludes the inclusion of on-site rehabilitation works referred to under conditions 2.24 to 2.26, in consultation with the OEH, from inclusion as part of the compensatory habitat package required under condition 2.27.	Letter from Western Sydney Parklands Trust (5 July 2011).	Compliant	The package was increased from 3.4 ha to 4.1 ha (letter from Western Sydney Parklands trust).
	2.28A	The Proponent must monitor aquatic ecology in Angus and Eastern Creeks as outlined in the Statement of Commitments, and must expand this monitoring program to: a) ensure that baseline data is collected, including the commencement of sampling not less than six months before commencement of construction and the use of control sites; b) include monitoring of water quality and aquatic ecology at four locations within Nurragingy Reserve; c) not include the site sampled on Eastern Creek ("E01" - in Technical Report 4 of the EAR) as a monitoring site, but use of at least two other locations; and d) make provision for monitoring in relation to wet and dry periods.	Master data_Terrestrial ecology spreadsheet which documents biometric data from Spring 2012 to Summer 2017. This spreadsheet includes aquatic ecology monitoring results. AEMR for the period 1 October 2015 to 30 September 2016 (dated 28 September 2016). AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018). Terrestrial Ecology Monitoring report, Q1 2016 (summer), Jacobs.	Compliant	Aquatic ecology monitoring undertaken in Angus (Nurragingy Reserve) and Eastern Creeks on a quarterly basis by Jacobs.

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	2.29	Except as may be expressly provided by an Environment Protection Licence for the project, the Proponent must comply with section 120 of the Protection of the Environment Operations Act 1997, which prohibits the pollution of waters.	Site observations. AEMR prepared for the period 1 October 2015 to 30 September 2016 (dated 28 September 2016). AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018). Water quality monitoring results spreadsheet, including data for six sampling events between April 2016 and September 2017.	Compliant	A review of the water quality results for locations upstream and downstream of the site do not indicate that the site is polluting downstream waters.
	2.30	The Proponent must ensure that all proposed works within, or connected to Angus Creek are designed, constructed, operated and maintained in compliance with the DPI Water's Draft Guidelines – Watercourse Crossing Design & Construction and NSW Fisheries' Why do Fish Need to Cross the Road? – Fish Passage Requirements for Waterway Crossings (2004) and Policy and Guidelines for Fish Friendly Waterway Crossings (2004).	Design report prepared by KBR (1 June 2015) provided to Blacktown City Council. Sighted, email from Blacktown City Council (2 November 2015), reference David Hutton confirmed documents received and in accordance with design requirements.	Compliant	
	2.31	The Proponent must generally design, construct and maintain all stormwater management infrastructure on the site having regard to: a) restriction of future stormwater flows from the site to existing flow levels or better and utilising Council's On-Site Stormwater Detention Policy dated February 2005 as a guide; b) management all stormwater to minimise the discharge of sediments and other pollutants from the site. This must include the use of gross pollutant traps to screen captured stormwater prior to discharge; c) Landcom's Managing Urban Stormwater: Soils and Construction, 4th edition, March 2004 and Managing Urban Stormwater Soils and Construction: Volume 2D Main Road Construction; d) compliance with the relevant provisions in the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems 1994; e) prevention the drainage of stormwater onto neighbouring properties and adjoining roadways; f) prevention of overloading Council's stormwater infrastructure by site discharges during heavy rainfall events; g) Council's Stormwater Quality Control Policy dated 1 June 2005; h) from the date of approval of MOD 2, Part J of the Blacktown Development Control Panel (2015), titled Water Sensitive Urban Design and Integrated Water Cycle Management (in place of the documents listed in paragraph g) above); and i) current water-sensitive design best-practice guidelines, such as Sensitive Urban Design Technical Guidelines for Western Sydney (Upper Parramatta River Catchment Trust) dated May 2004.	Design report prepared by KBR (1 June 2015) provided to Blacktown City Council. Sighted, email from Blacktown City Council (2 November 2015), reference David Mutton confirmed documents received and in accordance with design requirements. Site observations.	Compliant	The stormwater management infrastructure on the site appeared to be well maintained.
	2.31	Prior to the commencement of construction of the project, the Proponent must submit the Secretary, certification from a qualified, independent civil engineer that the stormwater management systems for the site have been designed generally in accordance with the above requirements, or equivalent outcomes as may be endorsed by the independent civil engineer and agreed by the Secretary.	Letter from Department of Planning and Infrastructure (6 October 2011), advising approval of works for Stage 1 construction activities which included stormwater management.	Compliant	
	2.32	The Proponent must obtain Rail Corporation New South Wales endorsement for any on site drainage works to ensure that the project does not result in the flooding of the Main West Railway Line.	Sighted RailCorp Rooty Hill - Holcim Siding Project - comments register, confirming concept design and detailed design elements for drainage and flooding endorsed by Rail Corporation of NSW.	Compliant	

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	2.32A	All stormwater management measures location within the 1% AEP extent of inundation must be designed and constructed to have minimal impact on the 1% AEP flood regime.	Sighted KBR flood study review (Holcim Rooty Hill Sidings - Angus Creek Flood Study - 23 March 2012). Site audit and aerial photography confirmed location.	Compliant	
	2.33	The Proponent must ensure that all external lighting associated with the project is mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadway. The lighting must be the minimum level of illumination necessary and must comply with AS 4282(INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting.	Site observations during the day.	Not verified	Site audit was undertaken during the day and did not confirm lighting complies with AS4282 (INT) 1997. However, no complaints regarding lighting have been received and there is no reason to believe that the lighting does not comply with this standard.
	2.34	Prior to the commencement of site preparation activities associated with the project, the Proponent must submit for the approval of the Secretary, a detailed Landscape Plan for the whole of the project (including the proposed administrative building) prepared by a qualified landscape architect, and consistent with the Landscape Master Plan detailed in the EAR, as amended by any requirement specified elsewhere in this approval. The Plan must include (provided it is consistent with and not in derogation of the Vegetation Management Plan in condition 2.24) the following: a) species that are predominantly endemic to the locality (that is from the River-Flat Eucalypt Forest and Cumberland Plain Woodland communities) and including details of, but not limited to, the number and type of species, the pot sizes, details of mulching, and staking; b) planting to visually screen the project as far as practicable when viewed from nearby residential properties and public areas. Particular attention must be given to screening the project, where practicable, from lines of site towards the Nurraringy Reserve and Blacktown Olympic Park; and c) the setback to the road frontages (of at least 7.1 metres) must be comprehensively landscaped.	Letter from the Department of Planning and Infrastructure (29 September 2011), providing approval for the Landscape Management Plan.	Compliant	
	2.34	The Proponent must maintain the above mentioned landscaping works in a healthy and tidy state throughout the life of the project.	Site observations.	Compliant	All plants appear to be in a healthy, tidy state.
	2.35	This approval does not permit the display of any advertisement, or the erection of any advertising structure, on the site. This condition does not apply for any advertisement or structure that cannot be seen from the nearest public space, or any signage specified elsewhere in this approval.	Site observations.	Compliant	Observations confirmed no advertising signage is erected on the site.
	2.36	The Proponent must not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated by the project to be disposed of at the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997.	Waste records spreadsheet with records dating from 31 March 2017 to 23 July 2018.	Compliant	No waste generated from outside the site was observed during the time of the audit site inspection.
	2.36	Note: The above condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if it requires an environment protection licence under the Protection of the Environment Operations Act 1997.	-	Note	
	2.37	Should any Aboriginal relics be uncovered during any of the construction activities, all construction work in the vicinity of the relic must cease and the Proponent must contact OEH and the Local Aboriginal Land Council as soon as practicable. The proponent must meet the requirements of the OEH with respect to the treatment, management and/or preservation of any such relic.	-	Not triggered	No record of findings during construction, staff on site advise no sighting since commencement of operations.
	2.38	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 the requirements of the EPA's Environmental Protection Manual Technical Bulletin Bunding and Spill Management.	Site observations.	Compliant	The diesel fuel station comprises a fuel storage tank within an enclosed container within a hard stand draining to an interceptor trap (trap was suitably maintained). The oil storage area was sighted during the site audit. The oil containers were stored on a bund, over a hardstand surface within a large maintenance shed.
	2.39	The Proponent must ensure that all operations and activities occurring at the site are carried out in a manner that prevents and/or minimises the risk of fire.	Site observations.	Compliant	No litter or uncontained waste or flammable material were observed during the site inspection.

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	2.4	The Proponent must provide appropriate fire-fighting equipment at the site, and must ensure appropriate volumes of emergency supplies of water (for fire fighting purposes), is provided at the site at all times during operations to ensure an appropriate response to any fire event.	Site observations.	Compliant	A fire pump room is located within the area adjacent the administration building and has a pump system (rated at approx 700 kPa). A pressure back-up switch has been installed to maintain pressure in the fire water ring main line (covering the entire site).
3. Environmental Monitoring and Auditing.	3.1	Prior to the commencement of operation of the project, the Proponent must prepare and implement an Operational Monitoring Plan for activities associated with the project. The Monitoring Plan must include, but not be necessarily be limited to, the following components:	Sighted, a copy of the Rooty Hill Regional Distribution Centre Operational Environmental Management Plan (OEMP) - (Final v1 OEM, 16 September 2015). Quarterly and annual monitoring reports provided on the company web site (construction - operation).	Compliant	
	3.1	a) a Noise Monitoring Program. The program must monitor noise levels during operational activities. The Monitoring Plan must include, but not be necessarily be limited to, the following components: i) identification of noise monitoring locations; ii) scheduling of noise monitoring, with reference to day, evening and night-time periods; iii) provisions and procedures for determining LAeq(15 minute), LA90(15 minute) and LA1(1 minute) noise levels; and iv) review and assessment mechanisms to establish and address noise impacts on residential receptors. v) such monitoring must be undertaken by an appropriate and recognised acoustic engineer, who is independent of, or not associated with, any organisation that has been involved with the acoustic assessment of the application (the subject of this approval), or involved in any supervision or designs associated with the construction of the project.	The OEMP includes a Noise Management Plan	Compliant	The Noise Management Plan describes measures addressing this criterion requirements (points i - v). Quarterly and annual monitoring reports provides the mechanism for reporting monitoring events undertaken each month.
	3.1	b) an Ambient Dust Monitoring Program. The program must provide for continuous monitoring of ambient dust concentrations (PM10) at no fewer than two locations at and around the site, as approved by the Secretary. The monitoring must employ the sampling and analysis methods specified under AM-18 or AS3580.9.8 and results of this monitoring must be recorded in $\mu\text{g m}^{-3}$ to demonstrate compliance with condition 2.8A.	The OEMP includes a Dust Management Plan. AEMR prepared for the period 1 October 2015 to 30 September 2016 (dated 28 September 2016). AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018).	Compliant	Two HVAS samples monitor PM ₁₀ .
	3.1	c) a Transport Monitoring Program to monitor traffic movements and driver behaviour of heavy vehicles associated with the project. This program must be applied to all heavy vehicles associated with the project. The Program must include, but not necessarily be limited to: i) details on the monitoring program, such as the frequency and methodology of the monitoring program. This program must include (but not be limited to) the 'spot' auditing of transport movements and driver behaviours at various operational times; ii) a regular internal review of results from the monitoring program to assess the performance of the transport management measures and to ensure compliance with the requirements of this approval; and iii) a protocol for implementing contingency measures should any non-compliance be detected.	The OEMP includes a Traffic Management Plan. Transport Monitoring Summary spreadsheet with monthly and quarterly monitoring results for the period 5 January 2016 to 1 December 2017.	Compliant	The Traffic Management Plan outlines measures to monitor/manage all heavy vehicle traffic movements associated with the operations. The plan includes a Transport Management Strategy, and a Transport Code of Conduct for heavy vehicles (including contractors).
	3.1	The Operational Monitoring Program must be incorporated into the Operational Environmental Management Plan for the project (refer to condition 5.4 of this approval). The Proponent must implement the management plan as approved from time to time by the Secretary. Note: The results of the monitoring program required in condition 3.1 of this approval may be incorporated into the Annual Environmental Management Report, required by condition 6.3 of this approval.	The OEMP includes a Draft Operational Monitoring Plan.	Compliant	

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	3.2	<p>The Proponent must review the Operational Monitoring Program referred to under condition 3.1 on a six-monthly basis, and may, with the agreement of the Secretary, alter the frequency and/ or scope of monitoring provided:</p> <p>a) pollutant/ parameter monitoring has been undertaken for a period of no less than six months (measured from the commencement of operation of the project);</p> <p>b) there has been no exceedence of any limit placed on the subject pollutant or parameter, through this consent or any Environment Protection Licence under the Protection of the Environment Operations Act 1997 within the preceding six-month period;</p> <p>c) there has been no reasonable complaint received from the public in relation to the subject pollutant/ parameter within the preceding six-month period (refer to condition 4.3 of this approval); and</p> <p>d) the EPA raises no objection to the proposed alteration to the frequency of pollutant/parameter monitoring.</p>	-	Non-compliant	<p>There is no evidence that the Operational Monitoring Program has been reviewed on a six-monthly basis.</p> <p>Recommendation: the Operational Monitoring Program should be reviewed following finalisation of this audit and every six months thereafter.</p>
	3.3	<p>Within 90 days of commencement of operations associated with the project and during a period in which the project is operating under normal operating conditions, the Proponent must conduct a Noise Audit of its operations. This Audit must:</p> <p>a) be undertaken by an appropriate and recognised acoustic engineer, who is independent of, or not associated with, any organisation that has been involved with the acoustic assessment of the application (the subject of this approval), or involved in any supervision or designs associated with the construction of the project;</p> <p>b) assess whether the project is complying with the criteria specified in condition 2.3 of this approval;</p> <p>c) identify what additional measures could be implemented to ensure compliance should any non-compliance be detected; and</p> <p>d) provide details of any complaints received relating to noise generated by the project, and action taken to respond to those complaints.</p>	A noise audit was undertaken on the site (22-23rd February 2016) by Golders Associates and found the noise generated from the use of the premises was in compliance with the development consent conditions.	Compliant	Although it is noted the noise Audit not undertaken within 90 days of the commencement of operations (1 October 2015).
	3.4	Within 28 days of conducting the Audit referred to under condition 3.3 of this approval, the Proponent must provide the Secretary and the DECCW with a copy of the Noise Audit report. If the Audit identifies any non-compliance with the noise limits imposed under this approval, the Proponent must detail within 30 days what additional measures would be implemented to ensure compliance, clearly indicating who would implement these measures, when these measures would be implemented, and how the effectiveness of these measures would be measured and reported to the Secretary. These ameliorative measures must be completed, if practicable, within 30 days of submission of the Noise Audit to the Secretary and a second noise audit must be conducted demonstrating acoustic compliance. If it is not practicable to complete the ameliorative measures within the 30 day period they should be undertaken in accordance with a timetable approved by the Secretary and the EPA.	<p>Letter to NSW Department of Planning and Environment (18 March 2016), with noise audit as appendix.</p> <p>AEMR prepared for the period 1 October 2015 to 30 September 2016 (dated 28 September 2016).</p>	Compliant	The AEMR indicates that the noise audit was submitted to the EPA and Council on 3 June 2016.

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	3.5	<p>The Proponent shall commission an independent person or team to undertake an Environmental Audit of the project at six months, and at two years after the commencement of operation of the project, and then as may be directed by the Director-General. The independent person or team must be approved by the Director-General prior to the commencement of the Audit. The Audit must:</p> <p>a) be carried out in accordance with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing;</p> <p>b) assess compliance with the requirements of this approval, and other licences and approvals that apply to the project;</p> <p>c) assess the environmental performance of the project against the predictions made and conclusions drawn in the documents referred to under condition 1.1 of this approval; and</p> <p>d) review the effectiveness of the environmental management of the project, including any environmental impact mitigation works.</p> <p>An Environmental Audit Report shall be submitted to the Director-General within two months of the completion of the Audit, detailing the findings and recommendations of the Audit and including a detailed response from the Proponent to any of the recommendations contained in the Report.</p> <p>The Director-General may require the Proponent to undertake reasonable works to address the findings or recommendations presented in the Report in relation to compliance with this approval. Any such works must be completed within such time as the Secretary may require.</p> <p>Note: This condition only requires audits to be undertaken and reported for the period prior to the approval of MOD2.</p>	<p>The previous audit period was 1 October 2015 to 31 March 2016.</p> <p>EMM Consulting was commissioned to undertake this independent environmental audit on 27 July 2017 (purchase Order 4520438773).</p>	Compliant	<p>The site inspection was delayed until 12 December 2018 due to personnel reasons within Holcim.</p> <p>Reporting was delayed by Holcim's consideration of the matters raised in relationship to Condition 1.1.</p> <p>Holcim sought and received an extension for the audit up to 20 April 2018 (see report appendices). However, this timeline was delayed due to a late provision of documentation.</p> <p>Extension for audit has been sought up to 20 April 2018 (see report appendices). However, this timeline was delayed due to a late provision of documentation.</p> <p>This audit addresses points a-d.</p> <p>Holcim will submit a response to the recommendations of this audit to DPE along with this audit report.</p>
	3.5A	<p>Within a year of the date of the approval of MOD 2, and every three years thereafter, unless the Secretary directs otherwise, the Proponent must commission and commence, and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <p>(a) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL or necessary water licences for the development (including any assessment, strategy, plan or program required under these approvals);</p> <p>(d) review the adequacy of strategies, plans or programs required under the abovementioned approvals;</p> <p>(e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any assessment, strategy, plan or program required under the abovementioned approvals; and</p> <p>(f) be conducted and reported to the satisfaction of the Secretary.</p>	-	Not triggered	MOD2 was approved on 29 June 2017. This audit period is 31 March 2016 to 12 December 2017. Given that the majority of the audit period was prior to the approval of MOD2, Condition 3.5 has been applied. However it is noted that agencies were consulted as part of this audit.
	3.5B	<p>Within 12 weeks of commencing an audit under condition 3.5A, or as otherwise agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of these recommendations as required. The Proponent must implement these recommendations, to the satisfaction of the Secretary.</p>	-	Not triggered	

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
4. Community Information, Consultation and Involvement.	4.1	By 30 September 2011, the Proponent must: (a) make copies of the following publicly available on its website: <ul style="list-style-type: none"> the documents referred to in condition 1.1; all relevant statutory approvals for the project; all approved strategies, plans and programs required under the conditions of this approval; a comprehensive summary of the monitoring results for the project; a complaints register, which is to be updated on a quarterly basis; the Annual Review reports required under this approval (over the last 5 years); any independent environmental audit of the project, and the Proponent's response to any recommendations in any audit; and any other matter required by the Secretary; and (b) keep this information up-to-date, to the satisfaction of the Secretary.	Website: http://www.holcim.com.au/about-us/community-link/regional-distribution-centre-rdc-rooty-hill-nsw.html	Compliant	The website includes the documents related to the original EA, MOD1 and MOD2. These are indexed as "Environmental Assessment Report & Response", "Environmental Assessment Report (2010)" and "Project Application & Approval" respectively. Recommendation: the website is updated so that the index refers to "Original Environmental Approval", "MOD 1 Environmental Approval" and "MOD 2 Environmental Approval", or similar.
	4.2	Prior to the commencement of construction of the project, the Proponent must ensure that the following are available for community complainants for the life of the project (including construction and operation): a) a telephone number on which complaints about construction and operational activities at the site may be registered; b) a postal address to which written complaints may be sent; and c) an email address to which electronic complaints may be transmitted.	Website: http://www.holcim.com.au/about-us/community-link/regional-distribution-centre-rdc-rooty-hill-nsw.html	Compliant	All contact details for registering complaints (from the public) are provided on the web site. In addition the web site provides a link to join the Community Liaison Group to encourage public engagement in the site operations.
	4.2	The telephone number, the postal address and the email address must be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public, and which clearly indicates the purposes of the sign.	Site observations.	Compliant	Site audit confirmed telephone, postal address and email address provided at the site entrance
	4.3	The Proponent must record details of all complaints received through the means listed under condition 4.2 of this approval in an up-to-date Complaints Register. The Register must record, but not necessarily be limited to: a) the date and time, where relevant, of the complaint; b) the means by which the complaint was made (telephone, mail or email); c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; d) the nature of the complaint; e) any action(s) taken by the Proponent in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken.	INX register.	Compliant	A software program (INX) has been established to record incidents and events that may occur, this includes provision to collect and manage complaints registered by members of the public. No complaints have been registered in the period between the last audit (31 March 2016) and EMM's site audit (12 December 2017).
	4.3	The Complaints Register must be made available for inspection by the Secretary upon request.	-	Note	
	4.4	Prior to the commencement of any works associated with the project at the site, the Proponent must prepare and implement a Community Communication Strategy for the project. This strategy must be designed to enable the Proponent to respond to any enquiries from the local community and/or adjoining landowners and to provide mechanisms to inform the local community and adjoining landowners as to the operational environmental performance of the facility. The Strategy must include, but does not necessarily be limited to: a) mechanisms through which the Proponent can report to the local community and adjoining landowners on the operations of the project and its environmental performance; b) mechanisms through which the community and/or adjoining landowners can provide feedback to the Proponent in relation to the environmental management of the project; and c) mechanisms through which the Proponent can respond to any enquires or feedback from the community and/or adjoining landowners in relation to the environmental performance of operations at the project.	Community Consultation Strategy prepared by SKM (Version 0 September 2011 and Final Version 1 - June 2012), this strategy covers all elements of this criterion.	Compliant	

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	4.4	The Strategy must be approved by the Secretary prior to the commencement of construction of the project. The Proponent must implement the management strategy as approved from time to time by the Secretary.	Letter from the Department of Planning and Infrastructure (6 September 2011), providing approval for the Version 0 Community Communications Strategy.	Compliant	
5. Environmental Management.	5.1	Prior to the commencement of site preparation works, the Proponent must nominate a suitably qualified and experienced Environmental Representative(s) whose appointment is to receive prior approval of the Secretary. The Proponent must employ the Environmental Representative(s) on a full-time basis, or as otherwise agreed by the Secretary, during the operations at the site. The Environmental Representative must be: a) the primary contact point in relation to the environmental performance of the project; b) responsible for all Management Plans and Monitoring Programs required under this approval; c) responsible for considering and advising on matters specified in the conditions of this approval, and all other licences and approvals related to the environmental performance and impacts of the project; d) responsible for receiving and responding to complaints in accordance with condition 4.2 of this approval; and e) given the authority and independence to require reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, to direct that relevant actions be ceased immediately should an adverse impact on the environment be likely to occur. The Proponent must notify the Secretary of any changes to that appointment that may occur from time to time.	Rochelle Zammit/Flack is the Environmental Representative for the RHDC.	Administrative non-compliance	During the previous audit, a letter from the Department of Planning and Infrastructure (19 November 2015) advising of approval for the appointment of Mr Brian Cassel as the new environmental representative for the site (previously Mr George Poljak) was sighted. The Secretary has not been informed of the change to Rochelle Zammit. Recommendation: the Secretary should be informed of changes to Environmental Representative(s) appointments.
	5.2	The Proponent must prepare and implement a Construction Environmental Management Plan to outline environmental management practices and procedures to be followed during the site preparation and construction activities during each stage of the project. The Plan must be consistent with the Department's Guideline for the Preparation of Environmental Management Plans (DIPNR 2004) and must include, but not necessarily be limited to: a) the Management Plans listed under condition 5.3 of this approval; b) the environmental management and mitigation measures outlined in the documents referenced in condition 1.1; and c) complaints handling procedures during construction.	Construction Environmental Management Plan, SKM, September 2011 Construction Environmental Management Plan Stage 2 Works, SKM, August 2012. INX Register.	Non-compliant	The Stage 2 CEMP indicates that possible future construction as Stage 3 includes: concrete batching plant and a blending/pug mill. Both of these facilities were constructed in the audit period but are not specifically covered by a CEMP. It is noted that no complaints were registered during the construction of these facilities. Recommendation: the CEMP should be updated prior to any future building works.
	5.2	The Plan must be approved by the Secretary prior to the commencement of any site preparation and construction works associated with the project subject to this approval, or within such period otherwise agreed by the Secretary. Construction works associated with any stage of the project subject to this approval must not commence until written approval has been received from the Secretary for that stage. The Proponent must implement the management plan as approved from time to time by the Secretary.	Letter from the Department of Planning and Infrastructure (22 August 2012), reference 10/22440, advising of approval of the CEMP for Stage 1 and 2.	Compliant	See above regarding a CEMP for Stage 3 works.

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	5.3	<p>As part of the Construction Environmental Management Plan for the project, required under condition 5.2 of this approval, the Proponent must prepare and implement the following Management Plans:</p> <p>a) a Soil and Water Management Plan to detail measures to minimise dust, erosion and the discharge of sediment and other pollutants to lands and/or waters during construction works associated with the project. The Plan must be prepared in accordance with Landcom's Managing Urban Stormwater: Soils and Construction, 4th edition, March 2004.</p> <p>b) a Noise Management Plan to detail measures to minimise noise generated during construction activities associated with the project. The Plan must include, but not necessarily be limited to:</p> <p>i) identification of each work area, site compound and access route (both private and public), and the identification of the specific activities that will be carried out and associated noise sources at these sites;</p> <p>ii) identification of all potentially affected sensitive receivers, and the specification of the noise and vibration criteria for the proposed works (as identified in the documentation listed in condition 1.1);</p> <p>iii) demonstration that the construction methods (including construction traffic noise) will meet the objectives of the EA and noise criteria. This must include an analysis of feasible and reasonable noise mitigation measures that can be implemented to reduce construction noise impacts where the objectives are predicted to be exceeded;</p> <p>iv) a detailed description of what actions and measures would be implemented to ensure that these works would comply with the relevant noise and vibration criteria;</p> <p>v) procedures for notifying residents of construction activities that are likely to effect their noise and vibration amenity, as well as procedures for dealing and responding to noise complaints;</p> <p>vi) a description of how the effectiveness of these actions and measures would be monitored during the proposed works, clearly indicating how often this monitoring would be conducted, how the results of this monitoring would be recorded; and</p> <p>vii) if any non-compliance is detected, with the criteria in condition 2.3 or the noise mitigation measures described in the Noise Management Plan, a description of what procedures would be followed to ensure compliance.</p>	<p>Construction Environmental Management Plan prepared for Stage 1 and Stage 2 activities includes a Soil and Water Management Plan and a Noise Management Plan. Scope of plans address points a), b) (i)-(vii).</p> <p>Plans prepared in compliance with this criterion and available on the company web site.</p>	Compliant	<p>The project is in the operations phase.</p> <p>The concrete batching plant and a blending/pug mill were constructed in the audit period but are not specifically covered by a CEMP.</p> <p>See Condition 5.2 regarding a CEMP for Stage 3 works.</p>
	5.3	<p>c) a Traffic Management Plan to outline management of traffic conflicts associated with the construction of the project. The Plan must include, but not necessarily be limited to:</p> <p>i) details of traffic routes used by construction vehicles;</p> <p>ii) the number and type of vehicles to be used in the construction of the project, and their movements to, from and within the site per day;</p> <p>iii) minimum requirements for vehicle maintenance to address noise and exhaust emissions;</p> <p>iv) speed limits to be observed along routes to and from the sites and within the site; and</p> <p>v) behaviour requirements for vehicle drivers to and from the site and within the site.</p>	<p>Construction and Environmental Management Plan prepared for Stage 1 and Stage 2 activities includes a Traffic Management Plan. Scope of plans address points i) - v).</p> <p>Plans prepared in compliance with this criterion and available on the company web site.</p>	Compliant	<p>The project is in the operations phase.</p> <p>The concrete batching plant and a blending/pug mill were constructed in the audit period but are not specifically covered by a CEMP.</p> <p>See Condition 5.2 regarding a CEMP for Stage 3 works.</p>

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	5.3	<p>d) a Dust Management Plan to outline measures to minimise and manage any impacts from the construction of the project on local air quality. The Plan must include, but not necessarily be limited to:</p> <p>i) identification of all major sources of dust that may occur as result of the construction of the project;</p> <p>ii) description of the procedures to manage the emission of dust from the sources identified;</p> <p>iii) identification of the locations where monitoring of dust emissions is to be undertaken;</p> <p>iv) procedures for the monitoring of dust emissions from the project, in accordance with any requirements of the EPA;</p> <p>v) protocols for regular maintenance of the construction plant and equipment to minimise the potential for dust emissions;</p> <p>vi) a principal requirement to satisfy the relevant goals specified under condition 2.8 and 2.8A of this approval at all times;</p> <p>vii) a system that allows for periodic assessment and reasonable implementation of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA) to minimise dust impacts during the construction of the project;</p> <p>viii) a system for regular auditing to ensure the effective implementation and maintenance of mitigation measures required to achieve the air quality goals specified under condition 2.8 and 2.8A of this approval;</p> <p>ix) pro-active and reactive management and response mechanisms for particulate emissions, with specific reference to measures to be implemented and actions to be taken in a timely manner to minimise and prevent reasonably foreseeable elevated air quality impacts on surrounding land uses as a consequence of meteorological conditions during construction of the project or the specific construction works being undertaken at any particular time; and</p> <p>x) description of procedures to be undertaken if any non-compliance is detected.</p> <p>The Proponent must implement the management plan as approved from time to time by the Secretary.</p>	<p>Construction Environmental Management Plan prepared for Stage 1 and Stage 2 activities includes a Dust Management Plan. Scope of plans address points i) - x).</p> <p>Plans prepared in compliance with this criterion and available on the company web site.</p>	Compliant	<p>The project is in the operations phase.</p> <p>The concrete batching plant and a blending/pug mill were constructed in the audit period but are not specifically covered by a CEMP.</p> <p>See Condition 5.2 regarding a CEMP for Stage 3 works.</p>
	5.4	<p>The Proponent must prepare and implement an Operation Environmental Management Plan to detail an environmental management framework, practices and procedures to be followed during the operation of the project. The Plan must be consistent with the Department's Guideline for the Preparation of Environmental Management Plans (DIPNR 2004), and must include, but not necessarily be limited to:</p> <p>i) the complaints handling procedures (conditions 4.2 and condition 4.3 of this approval);</p> <p>ii) the environmental mitigation measures outlined in the Environmental Impact Statement (including those outlined in Table 18-1) and supporting information (as referenced in condition 1.1 of this approval);</p> <p>iii) the Monitoring Program listed under condition 3.1 of this approval; and</p> <p>iv) the Management Plans listed under condition 5.5 of this approval.</p>	Rooty Hill Regional Distribution Centre Operational Environmental Management Plan (OEMP) - (Final v1 OEM, 16 September 2015). OEMP consistent with Department Guidelines and includes components described in points i) - iv).	Compliant	
	5.4	The Plan must be submitted for the approval of the Secretary no later than one month prior to the commencement of operation of the project, or within such period otherwise agreed by the Secretary. Operation must not commence until written approval has been received from the Secretary. Upon receipt of the Secretary's approval of the Plan, the Proponent must provide a copy of the Plan to the EPA and Council as soon as practicable. The Proponent must implement the management plan as approved from time to time by the Secretary.	<p>Letter from the DPE (19 October 2015), advising approval of the OEMP.</p> <p>AEMR prepared for the period 1 October 2015 to 30 September 2016 (dated 28 September 2016).</p>	Compliant	The AEMR indicates that the noise audit was submitted to the EPA and Council on 3 June 2016.
	5.5	<p>As part of the Operation Environmental Management Plan for the project, required under condition 5.4 of this approval, the Proponent must prepare and implement the following Management Plans:</p> <p>a) a Noise Management Plan to outline monitoring, management procedures and measures to minimise total operational noise emissions from the project. This plan must include operational noise management, traffic noise management and train noise management. This plan must also include, but not necessarily be limited to:</p> <p>i) the Operational Noise Management Protocol, as outlined in condition 2.7 of this approval;</p> <p>ii) procedures for monitoring the project;</p> <p>iii) a program for handling and responding to noise complaints.</p>	OEMP includes a Noise management Plan, including an Operational Noise Management Protocol. The scope of the plan addresses points i) - iii).	Compliant	The Noise Management Plan and Operational Noise Management Protocol included within the OEMP have been prepared in compliance with this criterion.

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	5.5	b) a Traffic Management Plan to outline measures to manage all heavy vehicle traffic movements associated with the project to minimise impacts on the local and regional road network. This must include the Transport Management Strategy, a Transport Code of Conduct for heavy vehicles (including contractors).	OEMP includes a Traffic Management Plan.	Compliant	The Traffic Management Plan included within the OEMP has been prepared in compliance with this criterion.
	5.5	c) a Soil and Water Management Plan to detail measures to manage and mitigate the impacts of stormwater runoff from and within the site. The Plan must be consistent with the South Creek Stormwater Management Plan and must utilise Council's Stormwater Quality Control Policy dated 1 June 2005 as a guide. The Plan should include, but not necessarily be limited to: i) details of the monitoring requirements of this approval, specifically the requirements of condition 1.1 of this approval; and ii) details of any contingency measures that would be followed to ensure the protection of groundwater and neighbouring waterways should any non-compliance be detected or during an accident or emergency situation at the site that could result in the contamination of surface water or groundwater; and iii) evidence of compliance with the targets in Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC & ARMCANZ, 2000) October 2000.	OEMP includes a Soil and Water Management Plan. The scope of the plan addresses points i) - iii).	Compliant	The Soil and Water Management Plan included within the OEMP has been prepared in compliance with this criterion.
	5.5	d) a Dust Management Plan to outline measures to minimise and manage any impacts from the operation of the project on local air quality. The Plan must include, but not necessarily be limited to: i) identification of all major sources of dust that may occur as result of the operation of the project; ii) description of the procedures to manage the emission of dust from the sources identified; iii) identification of the locations where monitoring of dust emissions is to be undertaken; iv) procedures for the monitoring of dust emissions from the project, in accordance with any requirements of the DECCW; v) protocols for regular maintenance of equipment, conveyor systems and materials handling facilities to minimise the potential for dust emissions; and vi) a principal requirement to satisfy the goals satisfied [specified] under condition 2.8 of this approval at all times, including to the extent that is reasonable and practical, dust suppression considerations in the detailed design of the project; vii) a system that allows for periodic assessment and reasonable implementation of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA) to minimise dust impacts over the life of the project; viii) a system for regular auditing to ensure the effective implementation and maintenance of mitigation measures required to achieve the air quality goals specified under condition 2.8 of this approval; ix) pro-active and reactive management and response mechanisms for particulate emissions, with specific reference to measures to be implemented and actions to be taken in a timely manner to minimise and prevent reasonably foreseeable elevated air quality impacts on surrounding land uses as a consequence of meteorological conditions or the specific construction works being undertaken at any particular time; and x) description of procedures to be undertaken if any non-compliance is detected.	OEMP includes a Dust Management Plan. The scope of the plan addresses points i) - x).	Compliant	The Dust Management Plan included within the OEMP has been prepared in compliance with this criterion.
	5.5	e) a Vegetation Management Plan as described in condition 2.24 of this approval.	OEMP includes a Dust Management Plan and Vegetation Management Plan.	Compliant	The Vegetation Management Plan included within the OEMP has been prepared in compliance with this criterion.
	5.5	The proponent must implement the management plan as approved from time to time by the Secretary.	Site observations	Compliant	

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	5.6	Within 3 months of the submission of an: (a) incident report under condition 6.1 below; (b) Annual Review under condition 6.3 below; (c) Independent Environmental Audit under condition 3.5 or condition 3.5B above; and (d) any modifications to this consent, the Proponent must review the strategies, plans and programs required under this consent, to the satisfaction of the Secretary. The Proponent must notify the Department in writing of any such review being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary. Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the development.	-	Not triggered	MOD2 was approved on 29 June 2017. The triggers listed in (a) - (d) did not occur between 29 June 2017 and the end of the audit period, 12 December 2017.
	5.7	Where consultation with any public authority is required by the conditions of this consent, the Proponent must: (a) consult with the relevant public authority prior to submitting the required document to the Secretary for approval; (b) submit evidence of this consultation as part of the relevant document; (c) describe how matters raised by the authority have been addressed and any matters not resolved; and (d) include details of any outstanding issues raised by the authority and an explanation of disagreement between any public authority and the Proponent.	-	Not triggered	MOD2 was approved on 29 June 2017. Activities that required consultation with public authorities did not occur between 29 June 2017 and the end of the audit period, 12 December 2017. Consultation with relevant agencies was undertaken as part of this audit, with all letters documented within the audit report and attached as appendices. Audit evidence shows that previous agency consultation is kept on file for auditing purposes.
	5.8	Any reference to a guideline, policy, standard or similar document that must be taken into account, complied with or otherwise applied under any condition of this consent means a reference to that document or any later version or replacement of that document as it existed at the date at which the document must be applied.		Note	
6. Environmental Reporting.	6.1	The Proponent must notify the EPA and the Secretary of any incident with actual or potential significant adverse off-site impacts on people or the biophysical environment as soon as practicable after the occurrence of the incident ("initial notification"). The Proponent must provide written details ("written report") of the incident to the EPA and the Secretary within seven days of the date on which the incident occurred.	INX register.	Not triggered	There have been six incidents or events recorded since the last audit. None of these would be defined as having had significant adverse off-site impacts on people or the biophysical environment. All matters were able to be attended to and appropriately resolved in a timely manner.
	6.2	The Proponent must meet the reasonable requirements of the Secretary to address the cause or impact of any incident, as it relates to this approval, reported in accordance with condition 6.1 of this approval, within such period as the Secretary may require.	-	Not triggered	
	6.2	Note: Condition 6.2 of this approval does not limit or preclude the EPA from requiring any action to address the cause or impact of any incident, in the context of the EPA's statutory role in relation to the project.	-	Not triggered	
	6.3	The Proponent must, throughout the life of the project, prepare and submit to the Secretary, an Annual Review. The Annual Review must review the performance of the project against the Operation Environmental Management Plan (refer to condition 5.4 and condition 5.5 of Annual Review must include, but not necessarily be limited to: a) details of compliance with the conditions of this approval; b) a copy of the Complaints Register (refer to condition 4.3 of this approval) for the preceding twelve-month period (exclusive of personal details), and details of how theses complaints were address and resolved; c) a comparison of the environmental impacts and performance of the project against the environmental impacts and performance predicted in those documents listed under condition 1.1 of this approval; d) results of all environmental monitoring required under this approval and other approvals, including interpretations and discussion by a suitably qualified person; and e) a list of all occasions in the preceding twelve-month period when environmental performance goals for the project have not been achieved, indicating the reason for failure to meet the goals and the action taken to prevent recurrence of that type of incident.	AEMR for the period 1 October 2015 to 30 September 2016 (dated 28 September 2016). AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018).	Not verified	Holcim have not confirmed that the AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018) has been submitted to the Secretary. Alana to confirm whether the AEMRs have been forwarded to the Secretary.

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	6.4	The Proponent must submit a copy of the Annual Review to the Secretary, EPA and Council every year, with: i) the first Annual Review to be submitted within twelve months after the commencement of operation of the project; and ii) the second and subsequent Annual Review to be submitted concurrently with the EPA's Annual Return.	AEMR for the period 1 October 2015 to 30 September 2016 (dated 28 September 2016). AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018).	Not verified	See Condition 6.3.
	6.4	The Proponent must make the Annual Review available to the public for inspection upon request.	-	Not triggered	The AEMR prepared for 1 October 2015 to 30 September 2016 is available on the Holcim website.
	6.5	The Secretary may require the Proponent to address certain matters in relation to the environmental performance of the project in response to review of the Annual Environmental Report in relation to compliance with this approval and any comments received from the EPA and/or Council. Any reasonable action required to be undertaken must be completed within such period as the Secretary may agree.	-	Not triggered	

Appendix B

EPL compliance register

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)						
1. Administrative Conditions	A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Extractive Activities</td><td>Land-based extractive activity</td><td>> 500000 - 2000000 T extracted, processed or stored</td></tr></table>	Scheduled Activity	Fee Based Activity	Scale	Extractive Activities	Land-based extractive activity	> 500000 - 2000000 T extracted, processed or stored	Weighbridge records (1 January 2016 to 12 December 2017).	Compliant	Weighbridge records confirm less than 2 million tonnes of material being distributed per year.
	Scheduled Activity	Fee Based Activity	Scale								
	Extractive Activities	Land-based extractive activity	> 500000 - 2000000 T extracted, processed or stored								
	A1.2	Notwithstanding A1.1, the scale of distribution activity authorised under this licence must not exceed 4,000,000 tonnes per annum, being the amount equivalent to the distribution limit approved by the development consent granted under the Environmental Planning and Assessment Act 1979 for the premises specified in A2.	Weighbridge records (1 January 2016 to 12 December 2017).	Compliant	Weighbridge records confirm less than 2 million tonnes of material being distributed per year.						
A2.1	<p>The licence applies to the following premises:</p> <table><tr><th>Premises Details</th></tr><tr><td>HOLCIM</td></tr><tr><td>21 KELLOGG ROAD</td></tr><tr><td>ROOTY HILL</td></tr><tr><td>NSW 2766</td></tr><tr><td>LOT 1 DP 1150066</td></tr><tr><td>LOT 2, DP1193917</td></tr></table>	Premises Details	HOLCIM	21 KELLOGG ROAD	ROOTY HILL	NSW 2766	LOT 1 DP 1150066	LOT 2, DP1193917	-	Compliant	This is the current site address.
Premises Details											
HOLCIM											
21 KELLOGG ROAD											
ROOTY HILL											
NSW 2766											
LOT 1 DP 1150066											
LOT 2, DP1193917											
	A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	Site observations.	Compliant							
	P1.1	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	Site observations.	Compliant							

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)																								
2. Discharges to Air and Water and Applications to Land.	P1.2	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or setting of limits for the emission of noise from the point.</p> <table><tr><th colspan="3">Noise</th></tr><tr><th>EPA identi- fication no.</th><th>Type of monitoring point</th><th>Location description</th></tr><tr><td>2</td><td>Noise monitoring</td><td>Most affected residential location in Station Street, ROOTY HILL NSW 2766</td></tr><tr><td>3</td><td>Noise monitoring</td><td>Most affected residential location in Crawford Road, ROOTY HILL NSW 2766</td></tr><tr><td>4</td><td>Noise monitoring</td><td>Most affected residential location in Mavis Street, ROOTY HILL NSW 2766</td></tr><tr><td>5</td><td>Noise monitoring</td><td>Nurranginy Reserve, Knox Road, DOONSIDE NSW 2767</td></tr><tr><td>6</td><td>Noise monitoring</td><td>Colebee Centre, Nurranginy Reserve, Knox Road, DOONSIDE NSW 2767</td></tr><tr><td>7</td><td>Noise monitoring</td><td>Blacktown International Sportspark, Eastern Road, ROOTY HILL NSW 2766</td></tr></table>	Noise			EPA identi- fication no.	Type of monitoring point	Location description	2	Noise monitoring	Most affected residential location in Station Street, ROOTY HILL NSW 2766	3	Noise monitoring	Most affected residential location in Crawford Road, ROOTY HILL NSW 2766	4	Noise monitoring	Most affected residential location in Mavis Street, ROOTY HILL NSW 2766	5	Noise monitoring	Nurranginy Reserve, Knox Road, DOONSIDE NSW 2767	6	Noise monitoring	Colebee Centre, Nurranginy Reserve, Knox Road, DOONSIDE NSW 2767	7	Noise monitoring	Blacktown International Sportspark, Eastern Road, ROOTY HILL NSW 2766	<p>AEMR for 1 October 2015 to 30 September 2016 (dated 28 September 2016).</p> <p>AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018).</p> <p>INX Register</p>	Administrative non-compliance	<p>Noise monitoring is routinely undertaken at:</p> <ul style="list-style-type: none">- Knox Road- Blacktown International Sports Park- Station Street- Nurranginy Reserve <p>The following sites have been monitored but are not routinely monitored:</p> <ul style="list-style-type: none">- Crawford Road- Mavis Street <p>Total noise levels were consistently above noise criteria regardless of whether the site was operating or not (ie the site makes a small to negligible contribution to total noise levels). There is little value in noise monitoring at Crawford Road or Mavis Street.</p> <p>Recommendation: Holcim applies for the EPL to be amended to remove the requirement for monitoring at Crawford Road or Mavis Street.</p>
		Noise																											
EPA identi- fication no.	Type of monitoring point	Location description																											
2	Noise monitoring	Most affected residential location in Station Street, ROOTY HILL NSW 2766																											
3	Noise monitoring	Most affected residential location in Crawford Road, ROOTY HILL NSW 2766																											
4	Noise monitoring	Most affected residential location in Mavis Street, ROOTY HILL NSW 2766																											
5	Noise monitoring	Nurranginy Reserve, Knox Road, DOONSIDE NSW 2767																											
6	Noise monitoring	Colebee Centre, Nurranginy Reserve, Knox Road, DOONSIDE NSW 2767																											
7	Noise monitoring	Blacktown International Sportspark, Eastern Road, ROOTY HILL NSW 2766																											
	L1.1	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>Site observations.</p> <p>AEMR prepared for the period 1 October 2015 to 30 September 2016 (dated 28 September 2016).</p> <p>AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018).</p> <p>Water quality monitoring results spreadsheet, including data for six sampling events between April 2016 and September 2017.</p>	Compliant	A review of the water quality results for locations upstream and downstream of the site do not indicate that the site is polluting downstream waters.																								
	L2.1	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.	Waste records spreadsheet with records dating from 31 March 2017 to 23 July 2018.	Compliant	No waste generated from outside the site was observed during the time of the audit site inspection.																								
	L2.2	This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if those activities require an environment protection licence.	-	Note																									

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)																								
3. Limit Conditions	L3.1	Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2. POINT 2 <table><tr><th>Time period</th><th>Measurement parameter</th><th>Measurement frequency</th><th>Noise level dB(A)</th></tr><tr><td>Day</td><td>Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)</td><td>-</td><td>44</td></tr><tr><td>Evening</td><td>Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)</td><td>-</td><td>44</td></tr><tr><td>Night</td><td>Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)</td><td>-</td><td>39</td></tr><tr><td>Night</td><td>Night-LA1 (1 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)</td><td>-</td><td>53</td></tr><tr><td>Morning-Shoulder</td><td>Morning Shoulder-LAeq(15 minute) (6am-7am Mon.-Sat. & 6am-8am Sun & Public Holidays)</td><td>-</td><td>39</td></tr></table>	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Day	Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)	-	44	Evening	Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)	-	44	Night	Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	39	Night	Night-LA1 (1 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	53	Morning-Shoulder	Morning Shoulder-LAeq(15 minute) (6am-7am Mon.-Sat. & 6am-8am Sun & Public Holidays)	-	39	AEMR for 1 October 2015 to 30 September 2016 (dated 28 September 2016). AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018). INX register.	Compliant	No noise exceedances of the operational noise criteria as a result of site operations were reported during the audit period. No noise complaints were registered.
		Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																								
		Day	Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)	-	44																								
Evening	Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)	-	44																										
Night	Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	39																										
Night	Night-LA1 (1 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	53																										
Morning-Shoulder	Morning Shoulder-LAeq(15 minute) (6am-7am Mon.-Sat. & 6am-8am Sun & Public Holidays)	-	39																										
POINT 3 <table><tr><th>Time period</th><th>Measurement parameter</th><th>Measurement frequency</th><th>Noise level dB(A)</th></tr><tr><td>Night</td><td>Night-LA1 (1 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)</td><td>-</td><td>53</td></tr><tr><td>Night</td><td>Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)</td><td>-</td><td>39</td></tr><tr><td>Evening</td><td>Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)</td><td>-</td><td>39</td></tr><tr><td>Morning-Shoulder</td><td>Morning Shoulder-LAeq(15 minute) (6am-7am Mon.-Sat. & 6am-8am Sun & Public Holidays)</td><td>-</td><td>40</td></tr><tr><td>Day</td><td>Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)</td><td>-</td><td>40</td></tr></table>	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Night	Night-LA1 (1 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	53	Night	Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	39	Evening	Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)	-	39	Morning-Shoulder	Morning Shoulder-LAeq(15 minute) (6am-7am Mon.-Sat. & 6am-8am Sun & Public Holidays)	-	40	Day	Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)	-	40	As above	Compliant	As above		
Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																										
Night	Night-LA1 (1 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	53																										
Night	Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	39																										
Evening	Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)	-	39																										
Morning-Shoulder	Morning Shoulder-LAeq(15 minute) (6am-7am Mon.-Sat. & 6am-8am Sun & Public Holidays)	-	40																										
Day	Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)	-	40																										
<table><tr><td>Day</td><td>Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)</td><td>-</td><td>35</td></tr><tr><td>Morning-Shoulder</td><td>Morning Shoulder-LAeq(15 minute) (6am-7am Mon.-Sat. & 6am-8am Sun & Public Holidays)</td><td>-</td><td>35</td></tr><tr><td>Evening</td><td>Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)</td><td>-</td><td>35</td></tr><tr><td>Night</td><td>Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)</td><td>-</td><td>35</td></tr><tr><td>Night</td><td>Night-LA1 (1 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)</td><td>-</td><td>53</td></tr></table>	Day	Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)	-	35	Morning-Shoulder	Morning Shoulder-LAeq(15 minute) (6am-7am Mon.-Sat. & 6am-8am Sun & Public Holidays)	-	35	Evening	Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)	-	35	Night	Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	35	Night	Night-LA1 (1 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	53	As above	Compliant	As above						
Day	Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)	-	35																										
Morning-Shoulder	Morning Shoulder-LAeq(15 minute) (6am-7am Mon.-Sat. & 6am-8am Sun & Public Holidays)	-	35																										
Evening	Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)	-	35																										
Night	Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	35																										
Night	Night-LA1 (1 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	53																										

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)																								
		<div>POINT 5</div> <table><tr><th>Time period</th><th>Measurement parameter</th><th>Measurement frequency</th><th>Noise level dB(A)</th></tr><tr><td>All hours when in use</td><td>LAeq (15 minute)</td><td>-</td><td>50</td></tr></table> <div>POINT 6</div> <table><tr><th>Time period</th><th>Measurement parameter</th><th>Measurement frequency</th><th>Noise level dB(A)</th></tr><tr><td>All hours when in use</td><td>LAeq (15 minute)</td><td>-</td><td>50</td></tr></table> <div>POINT 7</div> <table><tr><th>Time period</th><th>Measurement parameter</th><th>Measurement frequency</th><th>Noise level dB(A)</th></tr><tr><td>All hours when in use</td><td>LAeq (15 minute)</td><td>-</td><td>55</td></tr></table>	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	All hours when in use	LAeq (15 minute)	-	50	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	All hours when in use	LAeq (15 minute)	-	50	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	All hours when in use	LAeq (15 minute)	-	55	As above	Compliant	As above
	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																									
	All hours when in use	LAeq (15 minute)	-	50																									
Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																										
All hours when in use	LAeq (15 minute)	-	50																										
Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																										
All hours when in use	LAeq (15 minute)	-	55																										
	L3.2	For the purpose of assessing noise contributions from the premises at the locations mentioned in condition L3.1, noise is to be: a) measured or computed at the most affected point on or within the boundary, or at the most affected point within 30 metres of a dwelling house (where the dwelling is more than 30 metres from the boundary) to determine compliance with LAeq (15 minute) noise limits; or b) measured or computed at 1 metre from the dwelling façade to determine compliance with LA1 (1 minute) noise limits; and c) a 5 dB(A) must be added to the measured or computed noise if the noise is tonal or impulsive in character.	AEMR for 1 October 2015 to 30 September 2016 (dated 28 September 2016). AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018).	Compliant	Noise measurements taken from approved locations identified within the noise audit (February 2016).																								
	L3.3	The noise limits set out in condition L3.1 apply under all meteorological conditions except for the following: a) wind speeds greater than 3 metres/ second at 10 metres above ground level; or b) stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or c) stability category G temperature inversion conditions.		Note																									
	O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Site observations.	Compliant	Observations indicated that the site is well maintained, storage is orderly and competently handled.																								

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
4. Operating Conditions	O2.1	Maintenance of plant and equipment 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.	Site observations.	Compliant	Site audit observations identified that all plant and equipment was well maintained and in proper working order. Interviews with site management indicated there was a good understanding of the equipment maintenance requirements for the site. Holcim's audit team showed two folders containing the following documentation (selected randomly): 1) Mobile plant service records including vehicle servicing and maintenance (selected randomly: 4/05/2017 and 14/10/2017 by Komatsu) and 2) Fixed plant service records (selected randomly: 8/11/2017 to 8/12/2017 by Thomas Coffey). Records looked well kept.
	O3.1	Dust The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Site observations.	Compliant	Sealed surfaces over entire site, sprinklers operating throughout heavy vehicle loading and movement areas, and wheel wash prior to exit in place. Road sweeping and use of water for dust suppression was observed. See Development Consent 1.1 regarding approved dust management measures.
	O3.2	Trucks entering or leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	Site observations.	Compliant	Site audit observation confirmed vehicle loads are covered exiting the site.
	O4.1	The licensee must prevent any tracking of mud on to public roads by vehicles leaving the premises.	Site observations.	Compliant	Trucks utilising the wheel wash station prior to leaving site. No mud was observed outside the site entrance.
	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.	-	Note	
	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.	INX Register. Labatory and monitoring reports viewed on site.	Compliant	Confirmed correspondence relating to environmental monitoring and incident recording in a legible form and kept at site, available for production. INX provides capacity to record and catalogue monitoring and reporting requirements.
	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.	Monitoring reports viewed on site.	Compliant	Noise and air quality sampling complies with requirements. The name of the person collecting the sample is recorded in a side column of Execl spreadsheets for both records.
	M2.1	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.	INX Register.	Compliant	

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
5. Monitoring and Recording.	M2.2	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.	INX Register.	Compliant	Recording system complies with the requirements.
	M2.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Labatory and monitoring reports viewed on site.	Compliant	
	M2.4	The record must be produced to any authorised officer of the EPA who asks to see them.	-	Not triggered.	
	M3.1	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.holcim.com.au/about-us/community-link/regional-distribution-centre-rdc-rooty-hill-nsw	Compliant	
	M3.2	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.holcim.com.au/about-us/community-link/regional-distribution-centre-rdc-rooty-hill-nsw Site observations.	Compliant	Enquiries phone number is also provided on Holcim's sign attached to the front gate.
	M3.3	The preceding two conditions do not apply until 3 months after the date of the issue of this licence.	-	Note	
	R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: a) a Statement of Compliance; and b) a Monitoring and Complaints Summary. 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.	Annual Return dated 6 November 2017, signed by Mark Edward Campbell Director and Rachel Todd Company Secretary. Annual return reporting period: 28 September 2016 to 27 September 2017.	Compliant	
	R1.2	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.	Annual Return dated 6 November 2017, signed by Mark Edward Campbell Director and Rachel Todd Company Secretary. Annual return reporting period: 28 September 2016 to 27 September 2017.	Compliant	
	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.	-	Not triggered.	

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
6. Reporting Conditions.	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.	-	Not triggered	
	R1.5	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Annual Return dated 6 November 2017, signed by Mark Edward Campbell Director and Rachel Todd Company Secretary. Annual return reporting period: 28 September 2016 to 27 September 2017.	Compliant	
	R1.6	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.	https://www.holcim.com.au/about-us/community-link/regional-distribution-centre-rdc-rooty-hill-nsw/environmental-monitoring-reports	Compliant	
	R1.7	Within the Annual Return, the Statement 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.	Annual Return dated 6 November 2017, signed by Mark Edward Campbell Director and Rachel Todd Company Secretary. Annual return reporting period: 28 September 2016 to 27 September 2017.	Compliant	
	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.	-	Not triggered	Not triggered. No incidents causing or threatening or likely to cause or threaten material harm to the environment have occurred on the RHDC site.
	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.		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.		Not triggered	
	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.		Not triggered	
	R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.		Not triggered	

Consent	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
	R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.		Note	
7. General Conditions.	G1.1	A copy of this licence must be kept at the premises to which the licence applies	Licence sighted in administration building.	Compliant	
	G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	-	Not triggered	
	G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Copy provided for the purposes of the audit.	Compliant	
8. Special Conditions.	E1.1	The licensee shall only undertake construction activities associated with the premises that are audible at any residential receptor, between the following hours: a) 7:00 am to 6:00pm, Mondays to Fridays, inclusive; b) 8:am to 1:00 pm on Saturdays; and c) at no time on Sundays and public holidays.	-	Not verified	Construction activities for Stage 3 (concrete batching plant and blending/pug mill) occurred during the audit period. The construction hours cannot be verified.
	E2.1	Within three (3) months of the commencement of operation, the licensee must undertake a noise verification monitoring campaign to verify that the activity is in compliance with the noise limits set out in the licence, per the monitoring requirements set out in the licence. The monitoring must attempt to measure the noise level of the operational activity at a selected number of receptor locations, sufficient to reasonably represent the surrounding residential receptors.	A noise audit was undertaken on the site (22-23rd February 2016) by Golder Associates and found the noise generated from the use of the premises was in compliance with the development consent conditions. Noise Audit not undertaken within 90 days of the commencement of operations (1 October 2015).	-	Previously an administrative non-compliance. However, outside of audit period.
	E2.2	Where the monitoring per the licence conditions may not be able to clearly record the noise level from the operation (e.g. as the representative receptor location(s) may be a significant distance away), the monitoring procedures outlined in the NSW Industrial Noise Policy, 2000 and/or accompanying guidance notes may be followed for monitoring at an interim location and calculating the likely noise level at the relevant receptor location. This may also include alternatives to minimum duration within assessment period and/or minimum number of assessment periods. However, any alternatives used must be justified to the EPA in the report required by condition E2.3	-	Not triggered	
	E2.3	Within six (6) weeks of the completion of the noise verification monitoring campaign required by the licence conditions E2.1 and E2.2, the licensee must provide a report containing the results and the interpretation of the monitoring to the EPA's Manager Sydney Industry, PO Box 668 Parramatta or metro.regulation@epa.nsw.gov.au including details of any reasonable and feasible improvement measures necessary to ensure the activity is in compliance with the noise limits set out in the licence.	Sighted, letter to NSW Department of Planning and Environment (18 March 2016), with noise audit as appendix.	-	Previously an administrative non-compliance. However, outside of audit period.
	E2.4	If the results of the noise verification program show that compliance is not being achieved, the noise verification program must be repeated per licence conditions E2.1, E2.2 and E2.3 within three (3) months of the implementation of any reasonable and feasible measures necessary to ensure the activity is in compliance with the noise limits set out in the licence.	-	Not triggered	The noise audit conducted in February 2016 found the use of the premises complied with the requirements for noise emissions provided under the licence conditions. Regular noise monitoring continues to be practiced on site (Jacobs reports witnessed online, and noise sampling spreadsheet provided at the site visit).

Appendix C

Statement of commitments compliance register

Commitment	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
Compliance with EA	1	To carry out the project generally in accordance with the documents listed in condition 1.1.	The original consent (DA 05_0051), Mod 1, Mod 2 documents. Site observations.	Non-compliant	See Development Consent Condition 1.1.
Noise	2	<p>The following noise controls will be implemented for the modified ROC:</p> <ul style="list-style-type: none"> • all conveyor drives and transfer points will be enclosed (or alternative comparative mitigation); • the most eastern side of the truck load-out facility will be enclosed; • noise walls will be constructed during the site establishment phase of construction (refer to Figure 6.1 for noise wall locations. Noise wall specifications are outlined in Appendix 2); • plant design, specification and implementation of the modified ROC to achieve the relevant noise criteria (refer to Appendix 2); • during construction noisy equipment will be situated behind structures that act as barriers or at distance from the noise-sensitive areas, where possible; • construction plant and equipment will be maintained in good working order; • during construction 'quiet' practices will be employed when operating equipment (e.g. unloading of trucks away from noise sensitive areas); and • Holcim will liaise with Blacktown City Council and the Western Sydney Parklands Trust regarding the management of construction noise impacts on Nurragingy Reserve. <p>Holdm is committed to achieving the noise mitigation outcomes achieved by the above management controls. As technological advances occur and through implementing operational management controls, Holcim may be able to achieve the same noise mitigation outcomes through alternative means. Holcim may therefore modify the above management controls in response to these technological advances or operational controls, provided that the same overall noise management outcomes are achieved.</p>	<p>AEMR for 1 October 2015 to 30 September 2016 (dated 28 September 2016).</p> <p>AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018).</p> <p>Site observations.</p>	Compliant	<p>Site audit confirmed the conveyor is enclosed, noise wall completed at the boundary of the truck load out facility. Noise audit and noise monitoring undertaken for operations did not identify exceedances to the prescribed limits.</p> <p>Construction of the main distribution centre is completed (including the concrete batching plant), no noise complaints or evidence of excess noise established during the construction phase.</p>

Commitment	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
Air Quality (Construction)	3	Holcim will implement the following controls during construction of the modified ROC to minimise dust emissions associated with the Project: <ul style="list-style-type: none"> • minimising all disturbed areas and stabilisation by progressive rehabilitation/stabilisation as soon as practicable; • clearly identifying and delineating areas required to be disturbed and ensuring that disturbance is limited to those areas; • minimising the area of disturbance by restricting vegetation clearing ahead of construction activities; • removal of any material which is tracked onto pavement surfaces at the end of each working day; • place hardstand material or install rumble grids at site exit points onto public roads to minimise the tracking of soil onto pavement surfaces; • all trafficable areas on the site will be maintained in a condition that will minimise the generation or emission of windblown or traffic generated dust from the site at all times; • vegetation will be established on soil stockpiles if they will be undisturbed for a period longer than three months; • topsoil stripping will be undertaken when there is sufficient moisture content in the soil to minimise dust generation; • plant and equipment will not be left idling when not in use; • restricting or ceasing dust-generating activities on extremely windy or dry days; and • ensuring that all equipment used on site will be maintained in good working order and in accordance with manufacturers specifications to minimise emissions. 	AEMR for 1 October 2015 to 30 September 2016 (dated 28 September 2016). AEMR for 1 July 2016 to 30 June 2017 (dated 30 March 2018). INX Register.	Not verified.	The project is in the operations phase. The concrete batching plant and a blending/pug mill were constructed in the audit period. Construction activities were not observed. There were no significant dust or noise non-compliances or complaints recorded during the audit period.
Air Quality (Operation)	4	Holcim will implement the following controls to minimise dust emissions associated with the operation of the project: <ul style="list-style-type: none"> • all conveyor transfer points will be enclosed; • conveyors will be covered on at least three sides; • water sprays will be used within the transfer point enclosures, rail unloading facility and in other enclosures as required to further minimise dust; • water spray systems will be installed to service all stockpiles; • the rail unloading facility will be enclosed in a building that is open at each end to allow trains to pass through; • all paved trafficable areas shall be swept as required by a permanently stationed street sweeper to minimise dust; • all trafficable areas on the site will be maintained in a condition that will minimise the generation or emission of windblown or traffic generated dust from the site at all times; • plant and equipment will not be left idling when not in use; • the radial stacker and associated stockpiles will have water sprays which will be used when the facility is in operation, including when loading vehicles, as required to suppress dust; • vehicle movements will be confined to designated areas, and vehicles will only travel on sealed roads; heavy vehicles entering and leaving the site that are carrying loads shall be covered at all times, except during loading and unloading activities; and • ensuring that all equipment used on site will be maintained in good working order and in accordance with manufacturers specifications to minimise emissions. 	Site observations.	Compliant	ite audit observations indicated measures to minimise dust emissions have been implemented on site: <ul style="list-style-type: none"> - Conveyor is covered. - Water sprayers provided within all designated areas, - Rail loading facility within an enclosed building, - sealed surfaces were clean, and a street sweeper is used. - Surface run-off from sealed pavement (trafficable) areas captured and filtered prior to release. - Water sprayers installed at radial stacker and stockpiles and in use for loading. - Vehicle movements confined to designated areas. - Loads observed to be covered upon departure (product enters site by rail). - All plant and equipment appeared to be well maintained and in good working order.

Commitment	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
Ecology	5	In addition to the existing commitments the following mitigation measures will be implemented to further reduce the impact of the modified ROC: <ul style="list-style-type: none"> • prior to any clearing operations being undertaken, the limits of clearing will be clearly marked; • native logs and bark removed during construction will be retained and reused in areas of Cumberland Plain Woodland, during regeneration and revegetation to provide sheltering habitat for the Cumberland land snail; • sedimentation and erosion control measures will be put in place and maintained during construction and operation to ensure that soil material does not enter surrounding woodland and waterways; and • the post-construction rehabilitation program will use local native plant species and incorporate a weed control program to prevent the spread of weed species into the surrounding woodland landscape. 	Site observations.	Compliant	See Development Consent conditions 2.24 to 2.27..
	6	Holcim will consider the small additional area of Cumberland Plain Woodland to be cleared for the modified ROC when establishing the Ecological Offset for the project as part of the preparation of the Vegetation Management Plan required by Project Approval Condition 2.24.	Ecological offset for the project has been negotiated, sighted, letter from Western Sydney Parklands Trust (5 July 2011), reference Yoland Gil, advising acceptance of \$277,350.00 as a compensatory habitat package.	Compliant	
Water Resources	7	All erosion and sediment control measures will be carried out in accordance with relevant guidelines for erosion and sediment control, including Managing Urban Stormwater: Soils and Construction (the Blue Book): <ul style="list-style-type: none"> • Volume 1 (Landcom, 2004); and • Volume 20 Main road construction (OECC, 2008). 	Site observations.	Compliant	The project is in the operations phase. Pre-construction and construction compliance is beyond the scope of this audit. Site audit observations confirmed soil, sediment and erosion controls in place on site and appear to be well maintained. Minor modifications are being undertaken to improve sediment capture within the site (loading areas) to reduce the likelihood of release to the watercourses adjacent the site.
Greenhouse	8	Holcim will develop and implement an Energy Saving Management Plan (ESMP) as part of the Operation Environmental Management Plan. The ESMP will review energy usage, identify energy savings opportunities, and based on this, will implement viable energy saving measures.	ESMP prepared and approved as Appendix I to the OEMP	Compliant	
Visual	9	The externally visible elements of the on-ground concrete storage bins, the concrete plant silos, concrete batching plant, unloading station and other bulky elements, will be coloured in tones that are sympathetic (i.e. green/brown tones) to the surrounding native vegetation.	Site observations.	Compliant	Site audit observations confirm external (visible) elements, eg conveyor covers, water tanks, unloading facility, boundary fence and site office coloured in green tones.

Commitment	Condition No.	Condition	Evidence Verified (2017)	Compliance (2017)	Comment (2017)
Hazard	10	<p>The following control measures will be implemented associated with the development in relation to the high pressure gas pipeline:</p> <p>Technical control measures include:</p> <ul style="list-style-type: none"> • design of piping and structures in accordance relevant standards; • geotechnical assessment to determine soil stability prior to construction activities; • use of appropriate equipment to minimise the impact on the pipe in the event of contact; and • use of process and design controls including limited excavation depths, buffer distances and designated crossings to limit potential for contact with or overstress of the pipe. <p>Non-technical safeguards and procedures include:</p> <ul style="list-style-type: none"> • assessment of process designs, site layout and design changes; • procedural control including the pipeline owner's Daily Permit System and site inductions; • preparation of operating/construction procedures, including awareness and training; • cessation of operations in adverse weather conditions; • implementation of site speed limit, driver training, route selection and physical barriers where appropriate; • provision of physical controls including fencing of siding during construction; • limiting access to authorised personnel only and implementation of security patrol if necessary; • appropriate training and supervision of operations; and • provision of ongoing maintenance and operation procedures. 	-	-	The design and installation of the high pressure gas pipeline occurred outside of the audit period.

Appendix D

Previous 2016 audit non-compliances

Consent	Condition No.	Condition	Compliance (2016)	Comment (2016)	Compliance (2017)	Comment (2017)
DA 05_0051						
2. Specific Environmental Conditions	2.14	The Proponent must clearly mark all visitor, disabled, ambulance and service vehicle parking areas.	NC2	RHDC Approved Construction Traffic Management Plan September 2011 - (Section 4.4. Signage) The contractor will implement a clear and concise signage scheme throughout the site to identify construction vehicles routes, and assist in internal traffic control. Signage will also identify the site office and parking areas (including disabled) for all personnel, site visitors, ambulance and service vehicles. Recommendation: a reserved ambulance bay is marked and signage is installed indicating parking spaces available to service vehicles.	Compliant	
	2.24	Prior to the commencement of any construction activities, the Proponent must prepare and implement to the satisfaction of the DPI Water and OEH, a Vegetation Management Plan in accordance with the NOW's guidelines How to Prepare a Vegetation Management Plan – Version 4 and Watercourse and Riparian Zone Rehabilitation Requirements as well as OEH Recovering Bushland on the Cumberland Plain. The Plan must include drawings that clearly show vegetation to be retained/removed, plant material to be used for rehabilitation, densities and species mix for areas to be rehabilitated, establishment methods, sequencing of tasks, maintenance and performance monitoring. Site rehabilitation and maintenance is to be carried out in accordance with the Plan, and the DPI Water is to be advised of the person responsible for any seed or vegetative propagation prior to the commencement of that propagation. The proponent must implement the management plan as approved from time to time by the Secretary.	NC2	Greening Australia identified during site audit as being responsible for vegetation management for the site. Unable to confirm if the NOW was advised of the person responsible for any seed or vegetative propagation prior to the commencement of that propagation. Recommendation: inform NOW (now DPI-Water) that Greening Australia has been contracted and is responsible for vegetation management for the site.	Compliant	The RHDC Vegetation Management Plan (August 2011, SKN Final version 0) and approved OEMP address the criteria in terms of vegetation to be retained/removed, plant material to be used for rehabilitation, densities and species mix for areas to be rehabilitated, establishment methods, sequencing of tasks, maintenance and performance monitoring, as well as vegetation propagation. Recommendation: The Vegetation Management Plan is updated in accordance with the latest development consent
	2.26	Immediately after completion of initial planting/seeding and every year thereafter for the duration of the maintenance period the Proponent must submit to the Department a monitoring report addressing the performance criteria as specified in the Vegetation Management Plan, and comment on the stability and condition of any stream works. With each monitoring report, the person responsible for implementing the Vegetation Management Plan must certify in writing that plantings (including follow-up plantings) have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.	NC2	Unable to confirm if the VMP monitoring report has been submitted to the DPE. Recommendation: submit monitoring reports to DPE.	Administrative non-compliance	It is unknown whether the required monitoring report has been submitted to DPE. Recommendation: submit monitoring reports to DPE including certification that plantings (including follow-up plantings) have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.
3. Environmental Monitoring and Auditing.	3.3	Within 90 days of commencement of operations associated with the project and during a period in which the project is operating under normal operating conditions, the Proponent must conduct a Noise Audit of its operations. This Audit must: a) be undertaken by an appropriate and recognised acoustic engineer, who is independent of, or not associated with, any organisation that has been involved with the acoustic assessment of the application (the subject of this approval), or involved in any supervision or designs associated with the construction of the project; b) assess whether the project is complying with the criteria specified in condition 2.3 of this approval; c) identify what additional measures could be implemented to ensure compliance should any non-compliance be detected; and d) provide details of any complaints received relating to noise generated by the project, and action taken to respond to those complaints.	NC2	Timing for this audit was materially affected by the Christmas New Year break/shut down and hence delayed till February when the site was again operational. Recommendation: no action required.	Compliant	Although it is noted the the noise Audit not undertaken within 90 days of the commencement of operations (1 October 2015).

Consent	Condition No.	Condition	Compliance (2016)	Comment (2016)	Compliance (2017)	Comment (2017)
	3.4	Within 28 days of conducting the Audit referred to under condition 3.3 of this approval, the Proponent must provide the Secretary and the DECCW with a copy of the Noise Audit report. If the Audit identifies any non-compliance with the noise limits imposed under this approval, the Proponent must detail within 30 days what additional measures would be implemented to ensure compliance, clearly indicating who would implement these measures, when these measures would be implemented, and how the effectiveness of these measures would be measured and reported to the Secretary. These ameliorative measures must be completed, if practicable, within 30 days of submission of the Noise Audit to the Secretary and a second noise audit must be conducted demonstrating acoustic compliance. If it is not practicable to complete the ameliorative measures within the 30 day period they should be undertaken in accordance with a timetable approved by the Secretary and the EPA.	NC2	In NSW, noise pollution is regulated through the Protection of the Environment Operations Act 1997 (POEO Act). The Environment Protection Authority (EPA) shares responsibility for enforcing noise control regulations with local government, NSW Police and NSW Roads and Maritime Services. Recommendation: noise audit report is provided to the EPA.	Compliant	The AEMR indicates that the noise audit was submitted to the EPA and Council on 3 June 2016.
	4.2	The telephone number, the postal address and the email address must be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public, and which clearly indicates the purposes of the sign.	NC2	Recommendation: a site email address is added to the entrance sign.	Compliant	Site audit confirmed telephone, postal address and email address provided at the site entrance
	5.4	The Plan must be submitted for the approval of the Secretary no later than one month prior to the commencement of operation of the project, or within such period otherwise agreed by the Secretary. Operation must not commence until written approval has been received from the Secretary. Upon receipt of the Secretary's approval of the Plan, the Proponent must provide a copy of the Plan to the EPA and Council as soon as practicable. The Proponent must implement the management plan as approved from time to time by the Secretary.	NC2	Recommendation: provide OEMP to the EPA and Council.	Compliant	The AEMR indicates that the noise audit was submitted to the EPA and Council on 3 June 2016.

Appendix E

Agency consultation letter example

20 November 2017

Ground Floor, Suite 01, 20 Chandos Street
St Leonards, NSW, 2065
PO Box 21
St Leonards, NSW, 1590

T +61 2 9493 9500

F +61 2 9493 9599

E info@emmconsulting.com.au

www.emmconsulting.com.au

NSW Environment Protection Authority

Via info@epa.nsw.gov.au

Re: Rooty Hill Distribution Centre - Independent Environmental Audit

Dear Sir/Madam,

EMM Consulting Pty Limited (EMM) has been engaged by Holcim Australia Pty Ltd to undertake an independent environmental audit of the Rooty Hill Distribution Centre (RHDC) located at 21 Kellogg Road, Rooty Hill, New South Wales (NSW). The appointment of the EMM audit team has been approved by the NSW Department of Planning and Environment (DPE).

The independent environmental audit is requirement under Condition 3.5 of the Land & Environment Court Decision No. 10406/2006 (Development Consent). The audit will consider RHDC's compliance with:

- Development Consent and Statement of Commitments No. 10406 of 2006;
- the project as described in the Environmental Assessment (EA) of 2005, EA Mod 1 of 2011 and EA Mod 2 of 2017;
- Environment Protection Licence (EPL) 20672 – Rooty Hill (as varied 28 September 2015);
- any other permits and licences; and
- key environmental management plans, assessments or programs required under the approvals listed above.

Condition 3.5 (a) of the Development Consent states that the audit must include consultation with the relevant agencies, which we believe are:

- Department of Primary Industries – Water (DPI Water);
- NSW Environment Protection Authority (EPA);
- NSW Roads and Maritime Services (RMS);
- NSW Office of Environment and Heritage (OEH); and
- Blacktown City Council;

We seek your comment on the involvement that your agency has had with the RHDC since the last audit on 31 March 2016, the compliance of the RHDC with conditions relevant to your agency and any general comments you have on the general environmental performance of the RHDC.

We would appreciate any written comments by Friday 1 December 2017. I am also available to discuss any matters that you believe are relevant to this audit. My contact details are provided below.

Should you have any questions, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink, consisting of a stylized 'P' followed by a long horizontal flourish.

Dr Philip Towler
Associate Director
ptowler@emmconsulting.com.au
T: 02 9493 9500
D: 02 9493 9518
M: 0409 702 050

Appendix F

Agency consultation responses

Phil Towler

From: Tania Amanovic
Sent: Wednesday, 22 November 2017 11:37 AM
To: 'Alfarid Hussain'
Cc: Julia Pope; Phil Towler
Subject: RE: Rooty Hill DC - Independent Environmental Audit (DPE)

Dear Alfarid

Thank you for your quick response.

Kind regards

Tania

Tania Amanovic | Environmental Scientist - Environmental Assessment & Management

T 02 9493 9500 | **D** 02 9493 9542 | **F** 02 9493 9599

Ground Floor, Suite 01, 20 Chandos Street, St Leonards NSW 2065

PO Box 21, St Leonards NSW 1590

Exciting news - EMM's expanding! [Introducing EMM's Adelaide office](#)



www.emmconsulting.com.au

[planning](#) | [environment](#) | [acoustics](#) | [ecology](#) | [heritage](#) | [groundwater](#) | [soils, closure, rehab](#) | [gis](#)



Please consider the environment before printing my email.

This email and any files transmitted with it are confidential and are only to be read or used by the intended recipient as it may contain confidential information. Confidentiality or privilege is not waived or lost by erroneous transmission. If you have received this email in error, or are not the intended recipient, please notify the sender immediately and delete this email from your computer. You must not disclose, distribute, copy or use the information herein if you are not the intended recipient.

From: Alfarid Hussain [mailto:Alfarid.Hussain@planning.nsw.gov.au]
Sent: Wednesday, 22 November 2017 11:31 AM
To: Tania Amanovic
Cc: Julia Pope; Phil Towler
Subject: RE: Rooty Hill DC - Independent Environmental Audit (DPE)

Dear Tania and Phillip

Thank you for your enquiry in relation to Holcim's Rooty Hill Distribution Centre (RHDC). At this stage, there are no comments from the Department in relation to the RHDC.


Please do not hesitate to contact me should you have any queries in relation to this site.

Alfarid Hussain
Compliance Officer
Compliance
Level 22, 320 Pitt Street | GPO Box 39 | Sydney NSW 2001
T 02 9274 6456





Subscribe to our [newsletter](#)

We've moved  You can find us at our new office
Level 22, 320 Pitt St, Sydney, 2000

From: Tania Amanovic [<mailto:tamanovic@emmconsulting.com.au>]
Sent: Wednesday, 22 November 2017 9:20 AM
To: Alfarid Hussain <Alfarid.Hussain@planning.nsw.gov.au>
Cc: Julia Pope <Julia.Pope@planning.nsw.gov.au>; Phil Towler <ptowler@emmconsulting.com.au>
Subject: RE: Rooty Hill DC - Independent Environmental Audit (DPE)

Dear Alfarid

Thank you for your email. Please find attached our letter seeking comment on the compliance of Holcim's Rooty Hill Distribution Centre (RHDC) with the conditions of consent relevant to the DPE, and any general comments you have on the environmental performance of the RHDC.

We would appreciate any written comments by Friday 1 December 2017.

Should you have any questions, please let us know.

Many thanks and Kind Regards

Tania

Tania Amanovic | Environmental Scientist - Environmental Assessment & Management

T 02 9493 9500 | **D** 02 9493 9542 | **F** 02 9493 9599

Ground Floor, Suite 01, 20 Chandos Street, St Leonards NSW 2065

PO Box 21, St Leonards NSW 1590

Exciting news - EMM's expanding! [Introducing EMM's Adelaide office](#)



www.emmconsulting.com.au

[planning](#) | [environment](#) | [acoustics](#) | [ecology](#) | [heritage](#) | [groundwater](#) | [soils, closure, rehab](#) | [gis](#)



Please consider the environment before printing my email.

This email and any files transmitted with it are confidential and are only to be read or used by the intended recipient as it may contain confidential information. Confidentiality or privilege is not waived or lost by erroneous transmission. If you have received this email in error, or are not the intended recipient, please notify the sender immediately and delete this email from your computer. You must not disclose, distribute, copy or use the information herein if you are not the intended recipient.

From: Alfarid Hussain [<mailto:Alfarid.Hussain@planning.nsw.gov.au>]
Sent: Tuesday, 21 November 2017 5:39 PM
To: Phil Towler; Tania Amanovic
Cc: Julia Pope
Subject: RE: Rooty Hill DC - Independent Environmental Audit (DPE)

Dear Tania,

I write to confirm that I will be the point of contact for Rooty Hill Distribution Centre. Please feel free to contact me if you have any queries in relation to this site.

Kind regards,

Alfarid Hussain

Compliance Officer

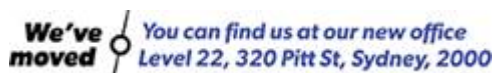
Compliance

Level 22, 320 Pitt Street | GPO Box 39 | Sydney NSW 2001

T 02 9274 6456



Subscribe to our [newsletter](#)



From: Tania Amanovic [<mailto:tamanovic@emmconsulting.com.au>]

Sent: Tuesday, 21 November 2017 1:09 PM

To: Howard Reed <Howard.Reed@planning.nsw.gov.au>

Cc: Phil Towler <ptowler@emmconsulting.com.au>

Subject: Rooty Hill DC - Independent Environmental Audit (DPE)

Dear Howard

EMM Consulting has been engaged by Holcim Australia Pty Ltd to undertake an independent environmental audit of the Rooty Hill Distribution Centre (RHDC). We are currently seeking comment on the compliance of RHDC with the conditions of consent relevant to the DPE.

We would appreciate if you could please advise who is the best contact within the DPE in regards to the above matter.

Many thanks and Kind regards

Tania

Tania Amanovic | Environmental Scientist - Environmental Assessment & Management

T 02 9493 9500 | **D** 02 9493 9542 | **F** 02 9493 9599

Ground Floor, Suite 01, 20 Chandos Street, St Leonards NSW 2065

PO Box 21, St Leonards NSW 1590

Exciting news - EMM's expanding! [Introducing EMM's Adelaide office](#)



www.emmconsulting.com.au

[planning](#) | [environment](#) | [acoustics](#) | [ecology](#) | [heritage](#) | [groundwater](#) | [soils, closure, rehab](#) | [gis](#)



Please consider the environment before printing my email.

This email and any files transmitted with it are confidential and are only to be read or used by the intended recipient as it may contain confidential information. Confidentiality or privilege is not waived or lost by erroneous transmission. If you have received this email in error, or are not the intended recipient, please

E-MAILED
1/12/2017

DOC17/587006
J17138_Letter to Agencies_EPA

Dr Philip Towler
EMM Consulting
Suite 01, 20 Chandos Street,
ST LEONARDS .NSW 2065

ptowler@emmconsulting.com.au

Dear Dr Towler

Thank you for your letter dated 20 November 2017 regarding Rooty Hill Distribution Centre - Independent Environmental Audit.

Holcim Australia Pty Ltd ("Holcim") is the holder of environment protection licence (EPL 20672) for premises located at 21 Kellogg Rd, Rooty Hill, NSW 2766. The EPA issued the licence to Holcim on 28 September 2015.

On 25 November 2016, the Environment Protection Authority (EPA) received Holcim's Annual Return for the reporting period 28 September 2015 – 27 September 2016 (No.91234). The Annual Return requires the licensee to self-report on any non-compliances with licence conditions. The Annual Return reported two non-compliances, both relating to Special Condition E2 entitled "Noise Impact Verification". The licensee failed to comply with conditions E2.1 and E2.3 which required the licensee to:

- Undertake a noise verification monitoring program within three (3) months of commencement of operations at the premises (Condition E2.1); and
- Provide a report containing results of noise monitoring by the due date specified in the licence conditions (Condition E2.3).

On 13 January 2017, the EPA issued a Formal Warning in response to the abovementioned breaches of the licence conditions (Notice No.154132).

The EPA conducted a site inspection of the premises on 28 July 2016 as part of the EPA's roll out of its new Risk Based Licensing approach and another site inspection on 23 March 2017. No breaches of licence conditions were identified during these site inspections.

There have been no known breaches of Holcim's licence conditions other than those outlined above. In addition, the licensee has reported no community complaints with regards to its operations at 21 Kellogg Rd, Rooty Hill and the EPA has not received any complaints with regards to the premises.

I trust this information is of assistance.

If you have any further questions, please contact Jacqueline Roberts, Operations Officer on (02) 9995 5259 or email Jacqueline.roberts@epa.nsw.gov.au.

Yours sincerely


G. Howard 1/12/17

GISELLE HOWARD
Regional Director Metropolitan
Environment Protection Authority



Department of
Primary Industries
Water

OUT17/48734

06 December 2017

EMM Consulting
Email: tamanovic@emmconsulting.com.au
Attention: Philip Towler

Dear Mr Towler,

Rooty Hill Distribution Centre – Independent Environmental Audit

I refer to your email dated 20 November 2017 seeking Crown Lands and Water Division (formerly DPI Water) comments on the Independent Environmental Audit of the Rooty Hill Distribution Centre.

Crown Lands and Water understands that the scope of the assessment as outlined under the development consent extends at least to compliance with:

- the conditions of consent and statement of commitments;
- the project as described in the Environmental Assessment;
- permits and licences; and
- key environmental management plans, assessments or programs required under the approvals.

Whilst Crown Lands and Water cannot comment extensively on the Department's involvement with the quarry since the last audit, Crown Lands and Water requests that the audit includes compliance with the conditions of consent relevant to any impacts on waterfront land and compliance with the Guidelines for Controlled Activities on Waterfront Land. This includes requirement to prepare and implement a Vegetation Management Plan and consult with Crown Lands and Water in the preparation of this plan and monitoring of its implementation.

It is also requested that the audit considers assessment as to whether the project holds any required water entitlements and licences under the *Water Management Act 2000* or *Water Act 1912* (as applicable) and compliance with the conditions of any water licences/approvals held.

Please contact Brendan Mee, Water Regulation Officer (Newcastle) on (02) 4904 2524 or brendan.mee@dpi.nsw.gov.au if you have further enquiries regarding this matter.

Yours sincerely,

Irene Zinger
Manager Regulatory Operations - Metro
Water Regulation

Phil Towler

From: Mitchell Royle [Mitchell.Royle@blacktown.nsw.gov.au]
Sent: Monday, 27 November 2017 5:09 PM
To: Tania Amanovic
Subject: RE: Rooty Hill DC - Independent Environmental Audit (Council)

Hi Tania,

As the EPA is the ARA for the premises my department has not had a significant level of involvement since the last audit on 31 March 2016.

I have reviewed our records and there have been no reports of pollution events or public health risks at the premises since the abovementioned date.

Kind regards,

Mitchell Royle
Environmental Health Officer



62 Flushcombe Road Blacktown
PO Box 63 BLACKTOWN NSW 2148 | DX 8117 Blacktown
Tel: 02 9839 6536 | Fax: 02 9831 1961

From: Tania Amanovic [<mailto:tamanovic@emmconsulting.com.au>]
Sent: Monday, 20 November 2017 11:23 AM
To: Blacktown Council
Subject: Rooty Hill DC - Independent Environmental Audit (Council)

Dear Customer Service

Could you please forward this email and attachment to the appropriate person at the Blacktown City Council

EMM Consulting Pty Limited (EMM) has been engaged by Holcim Australia Pty Ltd to undertake an independent environmental audit of the Rooty Hill Distribution Centre (RHDC). This is a letter seeking comment on the compliance of RHDC with the conditions of consent relevant to your agency and any general comments you have on the environmental performance of the RHDC.

We would appreciate any written comments by Friday 1 December 2017.

My contact details are as below should you have any questions.

Kind regards

Tania

Tania Amanovic | Environmental Scientist - Environmental Assessment & Management

T 02 9493 9500 | **D** 02 9493 9542 | **F** 02 9493 9599


Ground Floor, Suite 01, 20 Chandos Street, St Leonards NSW 2065
PO Box 21, St Leonards NSW 1590

Exciting news - EMM's expanding! [Introducing EMM's Adelaide office](#)



www.emmconsulting.com.au

[planning](#) | [environment](#) | [acoustics](#) | [ecology](#) | [heritage](#) | [groundwater](#) | [soils, closure, rehab](#) | [gis](#)

 *Please consider the environment before printing my email.*
This email and any files transmitted with it are confidential and are only to be read or used by the intended recipient as it may contain confidential information. Confidentiality or privilege is not waived or lost by erroneous transmission. If you have received this email in error, or are not the intended recipient, please notify the sender immediately and delete this email from your computer. You must not disclose, distribute, copy or use the information herein if you are not the intended recipient.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

This footnote also confirms that this email message has been swept for the presence of computer viruses.



SYDNEY

Ground floor, Suite 01, 20 Chandos Street
St Leonards, New South Wales, 2065
T 02 9493 9500 F 02 9493 9599

NEWCASTLE

Level 1, Suite 6, 146 Hunter Street
Newcastle, New South Wales, 2300
T 02 4907 4800 F 02 4907 4899

BRISBANE

Level 4, Suite 01, 87 Wickham Terrace
Spring Hill, Queensland, 4000
T 07 3839 1800 F 07 3839 1866

