

3.7 Incidents

There were no notifiable incidents as defined in SSD-10459 during the Audit period.

3.8 Actual versus predicted impacts

The audit considered the actual impacts arising from the carrying out of the Project (and whether they are consistent with the relevant impacts predicted in the EIS and RtS Report. A summary of the assessment is presented in Table 5. The Department's SSD-10459 (Jan 2021) considered the key assessment issues are operational noise, air quality and odour, water quality and riparian zone management.

Table 5: Summary of predicted versus actual impacts for key operational assessment issues

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
Contamination	The Stage 1 area can be made suitable for commercial/industrial land upon successful completion of the remediation action strategy. Remediation works in accordance with the Stage 1 remediation action plan (RAP) commenced in 2020 and the relevant Section A site audit statement, confirming the suitability of the site for ongoing commercial/industrial use, will be issued prior to the end of 2020.	Section A2 site audit statement no. 055-2127799 issued by EPA accredited site auditor Andrew Kohlrusch and dated 23 December 2020 certifies that the Stage 1 area is suitable for commercial/industrial uses subject to the implementation of the <i>Clyde Western Area Remediation Project, Stage 1 Long Term Environmental Management Plan</i> (LTEMP) prepared by ERM and dated 17 December 2020. Downer implements the LTEMP which only requires active controls in the event of ground disturbance. Downer procedures and training to staff require that any excavation works require Downer's approval of excavation permits and SWMS. Excavation permits include a Risk Assessment and formal approval by Downer. Some recommendations have been made by the auditor regarding LTEMP training.	Y
Noise	Noise generated during operation of Stage 1 will not exceed project noise trigger levels at nearby receivers, with the proprietary noise reduction measures incorporated into the asphalt plant design.	Noise Verification Report (NVR) 24/10/2022, Muller Acoustic Consulting (MAC) (CoC B17) provided directed attended noise measurements at seven representative monitoring locations during operations and predictive modelling. MAC (24/10/2022) concluded that noise emissions generated by the site comply with the relevant criteria at all assessed residential and industrial receivers. No operational complaints received to date and no noise issues were observed during the auditor's site inspection on 20/07/2023.	Y

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
Air quality and odour	Dust, other pollutants and odour generated during the project will not exceed criteria at residential receivers. However, cumulative criteria will be exceeded for nearby industrial and commercial receivers. Industrial receivers are subject to workplace air quality standards and the approved methods criteria are not applicable. The exceedance at the commercial receiver is minor and people would not be in this commercial premises for long term periods (ie an annual period). The 24-hour average concentrations at the commercial premises will be below the short-term criteria. Management measures will be implemented to further reduce the potential for dust impacts during construction and operation of the project.	Todoroski Air Sciences (TAS) (21/11/2022) report titled Air Quality Verification Report Downer Sustainable Road Resource Centre TAS (21/11/2022) indicates that the post-commission sampling (on 2/08/22 and 19/10/22) of the asphalt plant exhaust stack and a site inspection (on 7/9/22) undertaken to verify the air quality controls for the DSRRC shows that, while some pollutants measured during the post-commission sampling of the asphalt plant exhaust stack were higher than those estimated in the AQIA, all impacts from the Project were well below the relevant impact assessment criteria. TAS (21/11/22) indicates that no excessive visible dust was observed during the site inspection of 7/9/22. Further, no excessive visible dust was observed or odour noted during the auditor inspection on 20/7/23 No air quality complaints received since commencement of operations.	Y
Water quality	Separate water management systems will be constructed and maintained for construction and operations in Lot 6 (the DSRRC) and construction on the remainder of the subdivision. Water which falls on hard surfaces will drain into pits and flow through the pipes to a gross pollutant trap (GPT), and then to a bioretention basin then to a new outlet to Duck River. During the operational phase of the development, the proposed stormwater quality treatment system incorporating the use of a treatment train of gross pollutant traps and bio-retention filtration is proposed to mitigate any increase in stormwater pollutant load generated by the development.	The DSRRC operates its own stormwater management system as shown in the approved OEMP and observed during the auditor's site inspection on 20/7/24. A bioretention basin has been constructed at the southern part of the site, including a GPT, in accordance with the approved OEMP and LMP. Grasses and sedges have been planted in the bioretention basin which provides for water filtration and nutrient uptake by the plants. Downer undertakes water quality monitoring at the bioretention basin during discharges in accordance with the OEMP. A surface water verification report is required under CoC B29 within 18 months of commencement of operations.	Y
Riparian zone management	A 40m riparian corridor to be maintained along the Duck River	A 40m riparian area is established and has been landscaped in accordance with the approved OEMP and LMP. The riparian area is fenced off from the remainder of the site.	Y

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
Waste	Stage 1 (the DSRRC) will accept wastes from offsite, which will be processed, with some material re-used in onsite processes and the remainder reused, recycled or disposed offsite. Some waste materials processed offsite, will be used onsite in the production of asphalt. Material will be reused onsite to produce asphalt in accordance with the resource exemptions and orders.	Some waste is received on site in accordance with the DSRRC's EPL (21611) and the consent. The waste is reused on onsite for the production of asphalt in accordance with approved resource recovery exemptions and orders. Some general solid waste is generated during production activities which is removed off site to waste management facilities licensed to accept such waste. Downer incorporates strict waste tracking and waste management measures in its processes and OEMP as discussed in Appendix A.	Y

The physical extent of the DSRRC appeared to be consistent with the approved boundary shown in the consent's layout plans.

4. CONCLUSIONS

This Audit Report presents the findings from the first Independent Audit of the DSRRC operations, covering the first 14 months of operations, from commencement of operations on the period from 12 May 2022 to 20 July 2023 (the audit period). As the DSRRC was operational at the time of the audit, the audit also addressed those construction elements of the DSRRC that could be assessed on a desktop review.

The overall outcome of the Independent Audit was positive. Compliance records were organised and available at the time of the site inspection and interviews with Downer project personnel. Relevant environmental and compliance monitoring records were being collected and reported as required to provide verification of compliance to statutory requirements and the DSRRC environmental requirements. The audit findings were of an administrative nature. In summary:

- There were 111 CoCs assessed.
- Three (3) non-compliances were identified. These relate to notification of non-compliances to the Department, timing of first independent audit and project website content.
- 76 CoCs were considered by the Auditor to be compliant.
- 32 CoCs were considered by the Auditor to be not triggered.
- Five (5) observations were identified. These relate to the content of the site induction, notification to the Department of Bitumen Products Facility (BPF) not being constructed, updating monitoring reports once the BPF is operational (2) and submission of updated OEMP to the Department.

The Auditor would like to thank the auditees from Downer for their high level of organisation, cooperation and assistance during the Independent Audit.

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APPENDIX A – SSD 10459 CONDITIONS OF CONSENT

