



Orora Botany Mill

DA 05_0120

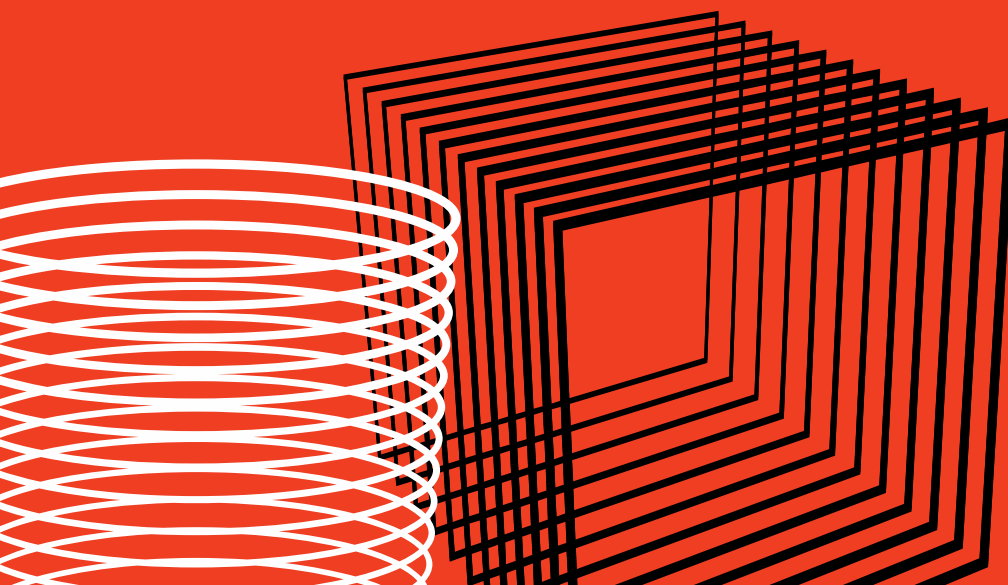
**Annual Environmental Monitoring – Operation
Compliance Report**

July 2018 – June 2019

Revision: 00

26/09/2019

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Karen Jones
Environment, Testing &
Management Systems
Manager**



1 Introduction

1.1 Project name and application number

Project Name: Construction of a new paper mill at Amcor's Matraville Plant (Project B9)
Application number: 05_0120

1.2 Project Addresses

1891 Botany Road, Matraville.

1.3 Project Phase

Operation.

1.4 Compliance Reporting Period

1st July 2018 to 30th June 2019

1.5 Project Activity Summary

During the reporting period, approval was given for the extension of the noise barrier and the demolition of the B7 reel store.

Construction of the noise barrier extension was completed, and half of the B7 reel store was demolished. The remainder of the reel store is scheduled for demolition during the next reporting period.

1.6 Key Project Personnel

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

2 Compliance Status Summary

2.1 Noise

Table 1 has been taken from the Operation and Construction Noise Impact Assessment by SKM, October 2006, and is part of the Environmental Assessment (EA) Report by SKM in December 2006.

Table 1: Predicted Noise Levels at Key Residential Locations.

Location	Predicted Noise Level Neutral Weather Conditions L _{Aeq} 15 Min		Predicted Noise Level Adverse Weather Conditions L _{Aeq} 15 Min		Project Criteria L _{Aeq} 15 Min	
	Day	Night	Day	Night	Day	Night
Australia Avenue	47	45	N/A	48	50	47
Murrabin Avenue	48	46	N/A	47	50	47
Partanna Avenue	44	41	N/A	43	50	47
Moorina Avenue	34	32	N/A	34	50	47

Table 1 differs from the Table 2, which are the noise limits imposed by Condition 10 in Schedule 3 of the Project Approval. These limits are generally lower than those predicted in the EA.

Table 2: Project Approval Noise limits

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

Noise monitoring, as is required by the Botany Mill Environmental Protection Licence (EPL) was conducted on a quarterly basis during the reporting period in August 2018, November 2018, February 2019 and May 2019. These noise monitoring reports can be found on the Orora website: www.ororagroup.com/about/disclosure. Comparisons of results from these monitoring periods with criteria and historical monitoring are shown in Figures 1-6.

As stated in the May 2019 Quarterly noise monitoring report by Hutchison Weller:

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

It can be seen from Figures 1-6 that even when the site is shut down, the background noise level at each receiver is often higher than the Project Approval noise limits.

The February 2019 Quarterly noise monitoring report states:

“the L_{Aeq} measured noise levels in the vicinity of the B9 Paper Mill will exceed the EPL criteria for day, evening and night time whether the paper mill is in operation or shut down.”

And

“Ambient noise levels measured using the L_{Aeq} noise parameter are not a true reflection of noise from the Orora site that may be better described using the L_{A90} statistical parameter.”

Tables 3 – 8 give the noise levels measured during the reporting period at each monitoring point. Noise levels remain fairly constant over time, neither trending up nor down.

Table 3: Noise levels measure at monitoring point R1

R1	L_{Aeq} , 15 min, dB(A)			L90 (10th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
Aug-18	53.2	49.6	47.5	42.5	43.1	41.2
Nov-18	51.9	50	47.3	41.4	42.2	40.2
Feb-19	54.2	52.3	47.8	40.9	41.9	38
May-19	50	48.1	45.6	39	41.6	40.2

Table 4: Noise levels measure at monitoring point R2

R2	L_{Aeq} , 15 min, dB(A)			L90 (10th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
Aug-18	53.9	51	50.1	41.5	43.6	44.5
Nov-18	57	47.9	48.1	40.8	40.9	37.6
Feb-19	53.9	51.5	46	38.7	40.6	37.2
May-19	48			39		

Table 5: Noise levels measure at monitoring point R3

R3	L_{Aeq} , 15 min, dB(A)			L90 (10th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
Aug-18	51.6	49.5	48.7	42.9	45.1	44.5
Nov-18	50.8	49.6	47.3	41.3	42.7	41.5
Feb-19	53.7	52.3	46.2	43.7	45.1	39.8
May-19	50.8	47.2	49.4	40.9	42.8	45.8

Table 6: Noise levels measure at monitoring point R4

R4	L _{Aeq} , 15 min, dB(A)			L90 (10th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
Aug-18	53.4	50.2	48.6	44.7	45.6	43.4
Nov-18	52.5	48.6	49.4	42.4	41.3	39.1
Feb-19	53.3	53.6	51.3	41.2	45.4	39.7
May-19	53.2	46.6	47.2	52.1	41.2	43.4

Table 7: Noise levels measure at monitoring point R5

R5	L _{Aeq} , 15 min, dB(A)			L90 (10th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
Aug-18	53.6	50.8	49.5	44.3	44.2	43.6
Nov-18	52.9	50.8	44.4	40.7	40.7	36.9
Feb-19	54	52.5	44.9	41.3	43.1	36.3
May-19	53	50.3	49.1	39.5	41.1	44.8

Table 8: Noise levels measure at monitoring point R6

R6	L _{Aeq} , 15 min, dB(A)			L90 (10th Percentile) dB(A)		
	Day	Evening	Night	Day	Evening	Night
Aug-18	52.2	49.1	45.4	44	42.5	40
Nov-18						
Feb-19	60.9	54.3	45.8	44.4	45	37.2
May-19	49.5	46.6	44.7	40.5	41	39

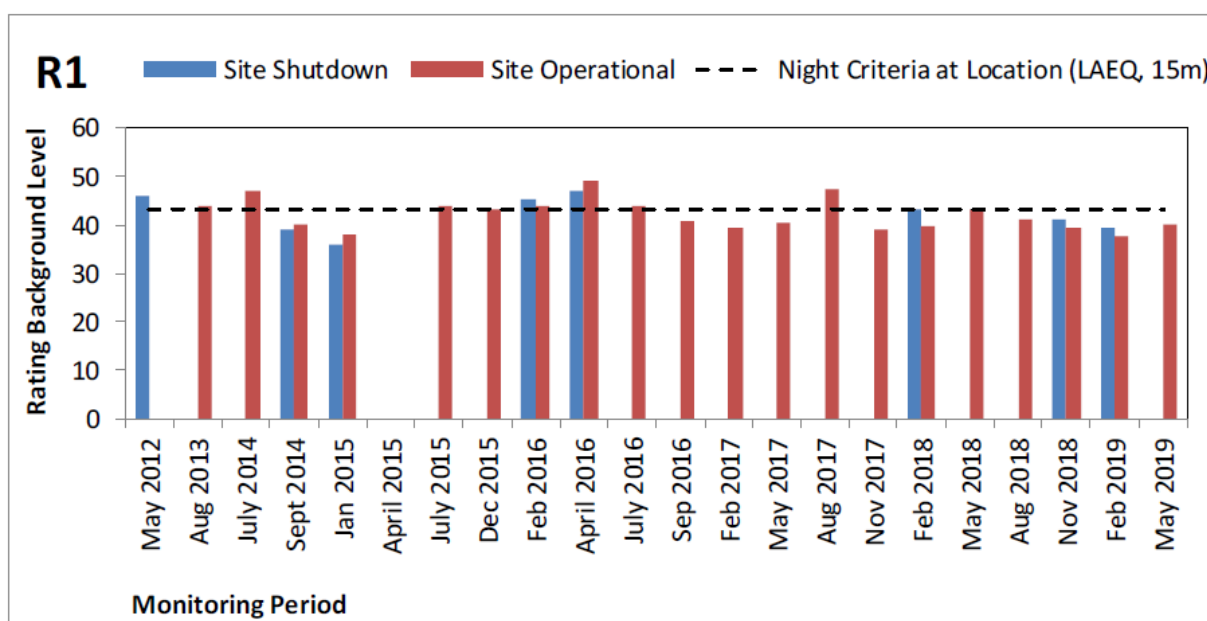


Figure 1: Historical background noise levels at R1

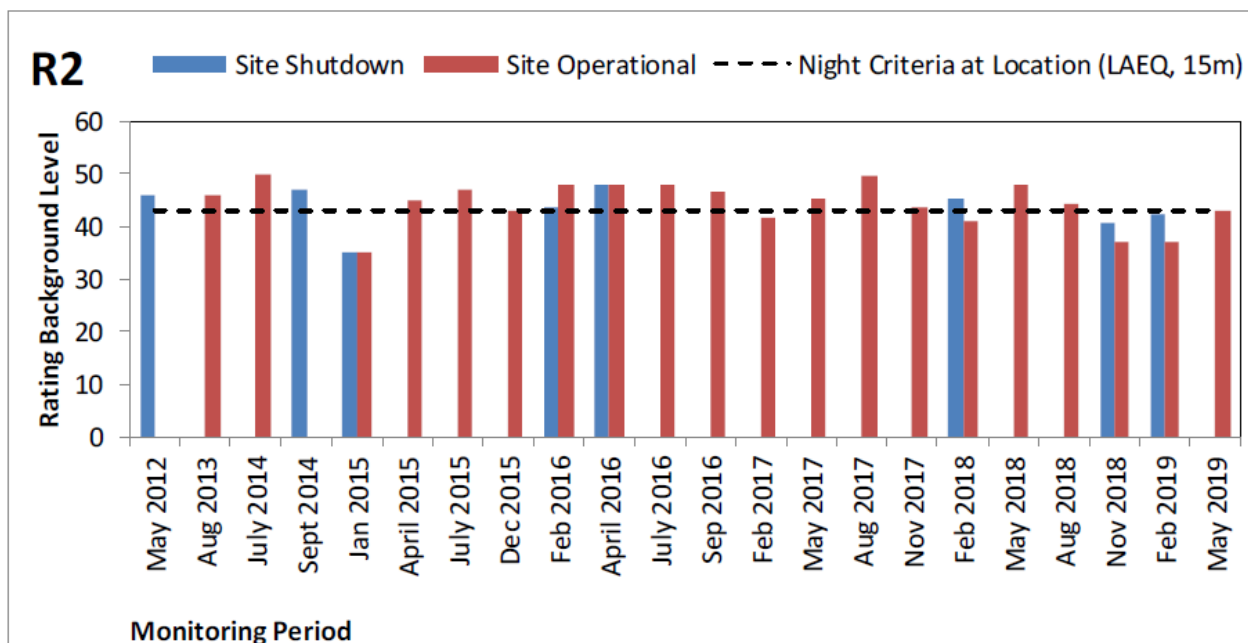


Figure 2: Historical background noise levels at R2

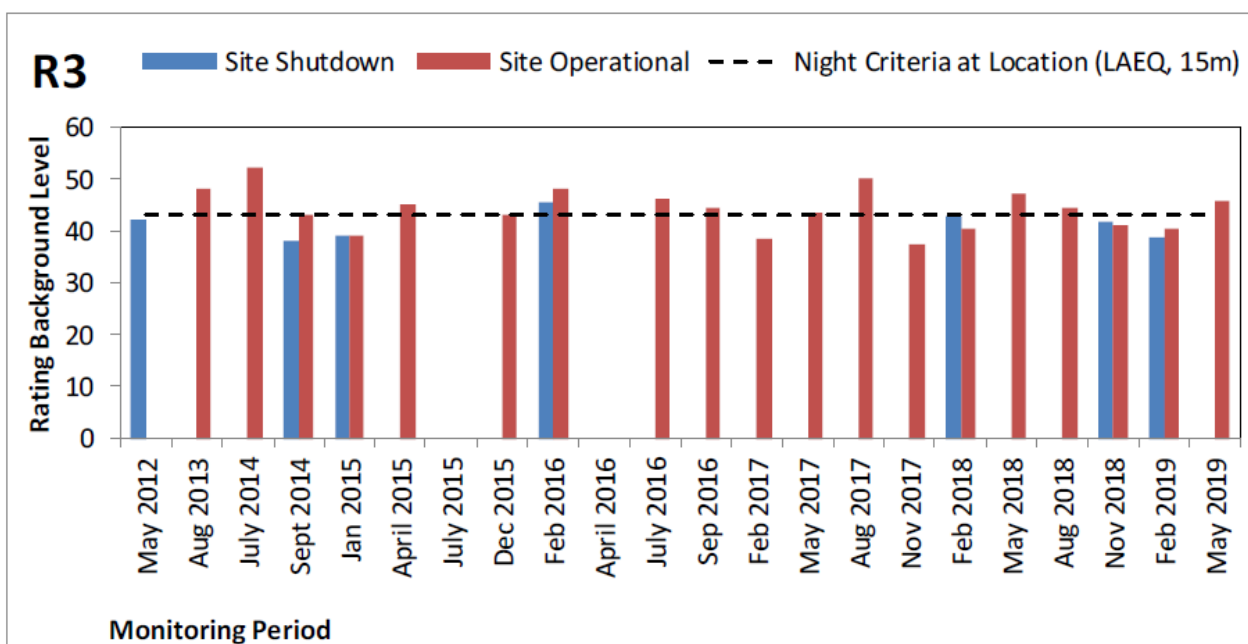


Figure 3: Historical background noise levels at R3

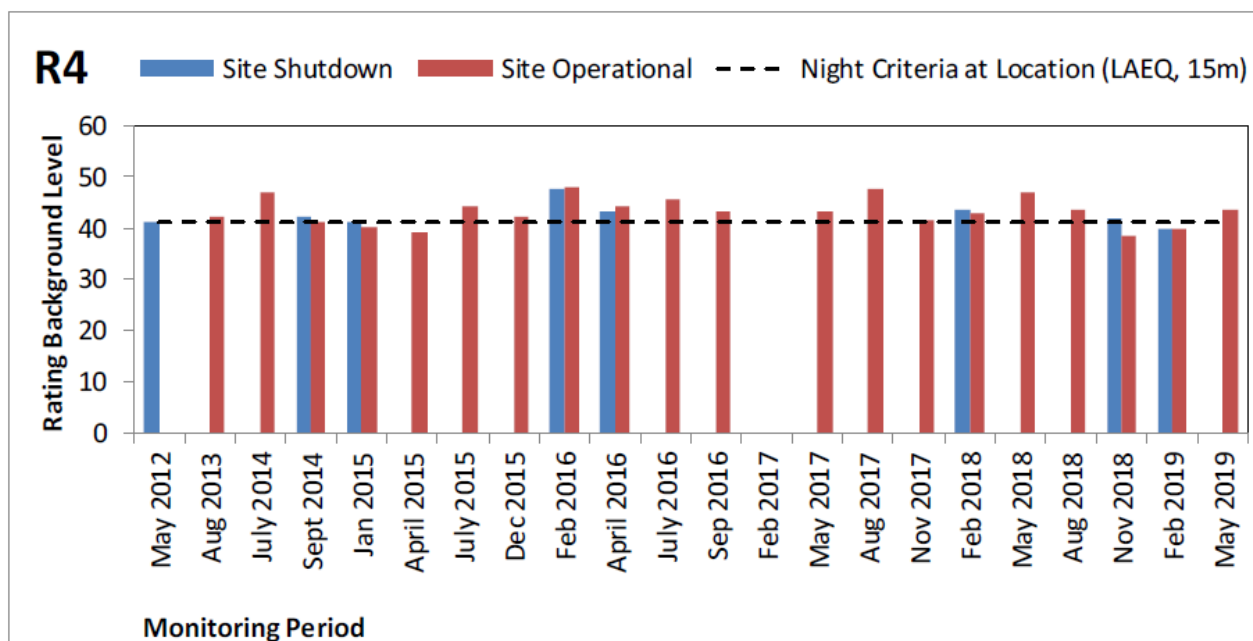


Figure 4: Historical background noise levels at R4

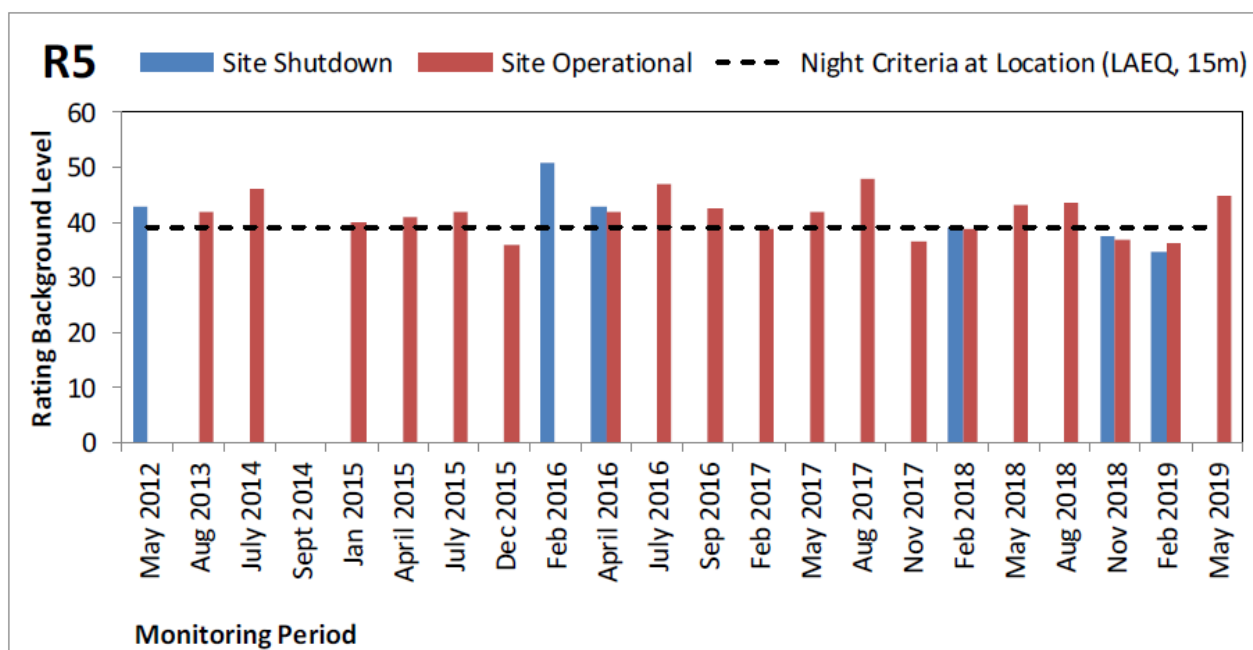


Figure 5: Historical background noise levels at R5

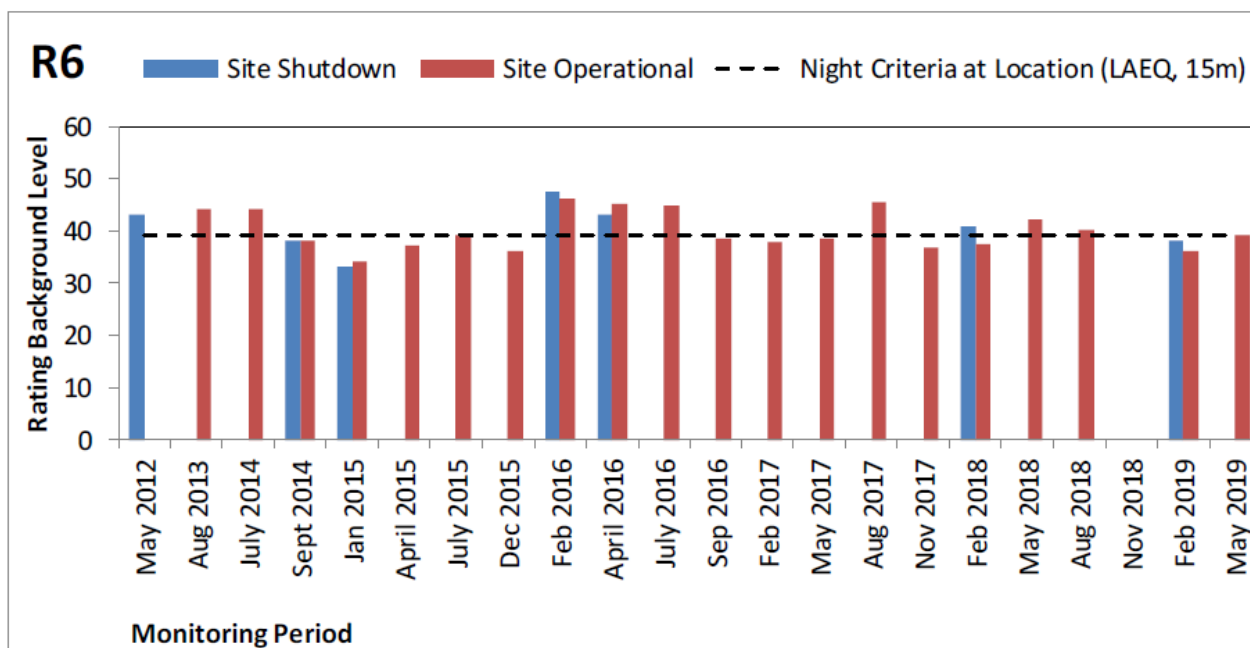


Figure 6: Historical background noise levels at R6

2.2 Water Use

B9 currently has the following water access licence (WAL) and Approval for extracting groundwater:

- WAL 36382
- Approval 10WA118709

Usage for the reporting period was within licence limits. The site used a total of 2,541 ML/yr, where the licence limit is 2,920 ML/yr.

Water use predicted by the EA was up to 12 ML/day of fresh water. During the reporting period the site used an average of 7 ML/day of groundwater.

2.3 Sydney Water Trade Waste

Orora Botany Mill holds a Consent to Discharge Industrial Trade Wastewater (the Consent) with Sydney Water for effluent from site. The Consent applies pollutant limits as set out in Table 9. In addition, pH and temperature of the effluent must be within the range 7.0 to 10.0 and below 38 degrees Celsius respectively.

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

Table 9: Sydney Water Trade Wastewater Consent Pollutant Limits

Substance	Daily Mass (kg/d)	Concentration (mg/L)
Biological Oxygen Demand	34,000	N/A
Suspended Solids	3,000	600
Total Dissolved Solids	30,500	10,000
Sulphate	1,500	2,000
Phenolic Compounds	9	1

An effluent flow of 4.3 ML/day was predicted in the EA for an assumed paper production rate of 345,000 T/year. During the reporting period, the site produced 426,000 Tonnes, and released an average of 6.1 ML/day of effluent to the Sydney Water sewer. The maximum daily discharged allowed by the Consent is 8.95 ML/day.

The EA stated that the Sydney Water sewer is unavailable approximately 3% of the time, due to high flow within the sewer during wet weather. During this time wastewater from the paper mill was discharged to Bunnerong Canal according to the EPA licence. This is no longer the case, with Sydney Water increasing their availability of the SWSOOS during wet weather, and 100% of the wastewater generated by the site was discharged to the Sydney Water sewer during the reporting period.

Twenty-five breaches of the Consent for Suspended Solids were recorded, with the majority within a three-month period from September to November 2018, as shown in Figure 7. These breaches were due to biological issues within the secondary water treatment plant, which was rectified early in 2019 by the removal of a significant amount of anaerobic biomass from the system. Only one suspended solids breach was recorded in the last five months of the reporting period. All breaches were reported to Sydney Water. Figures 8 to 12 show historical trends for the relevant pollutant test results.

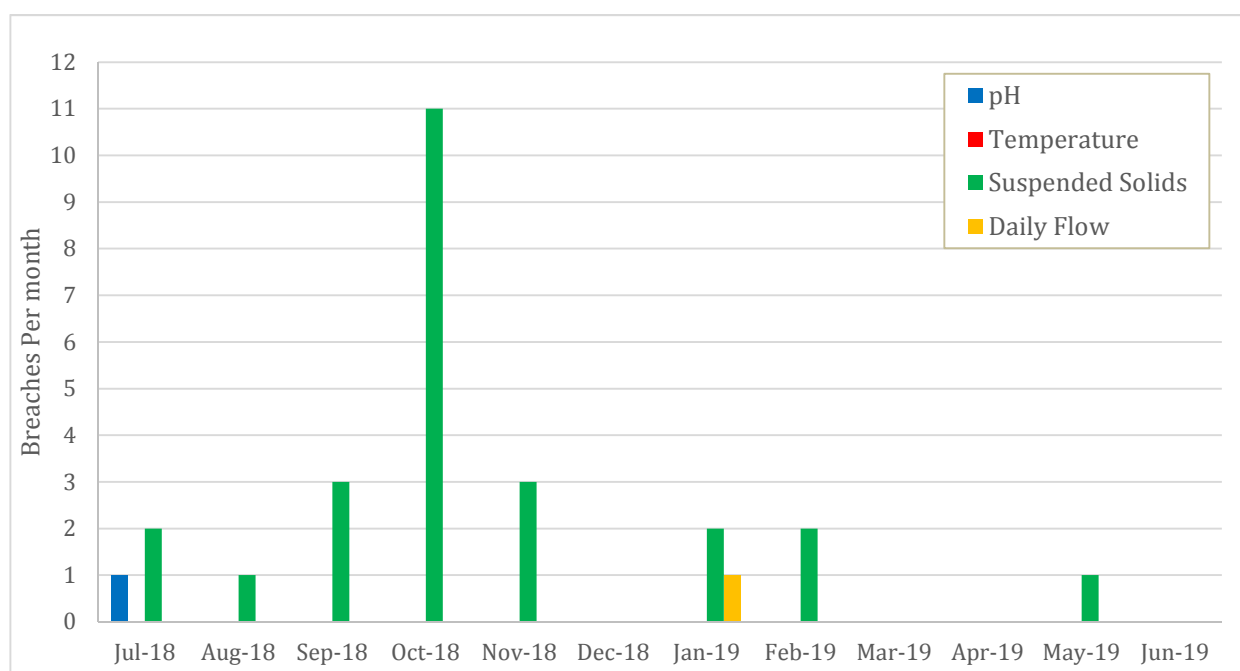


Figure 7: Breaches of Consent to Discharge Industrial Trade Wastewater in 2018-19

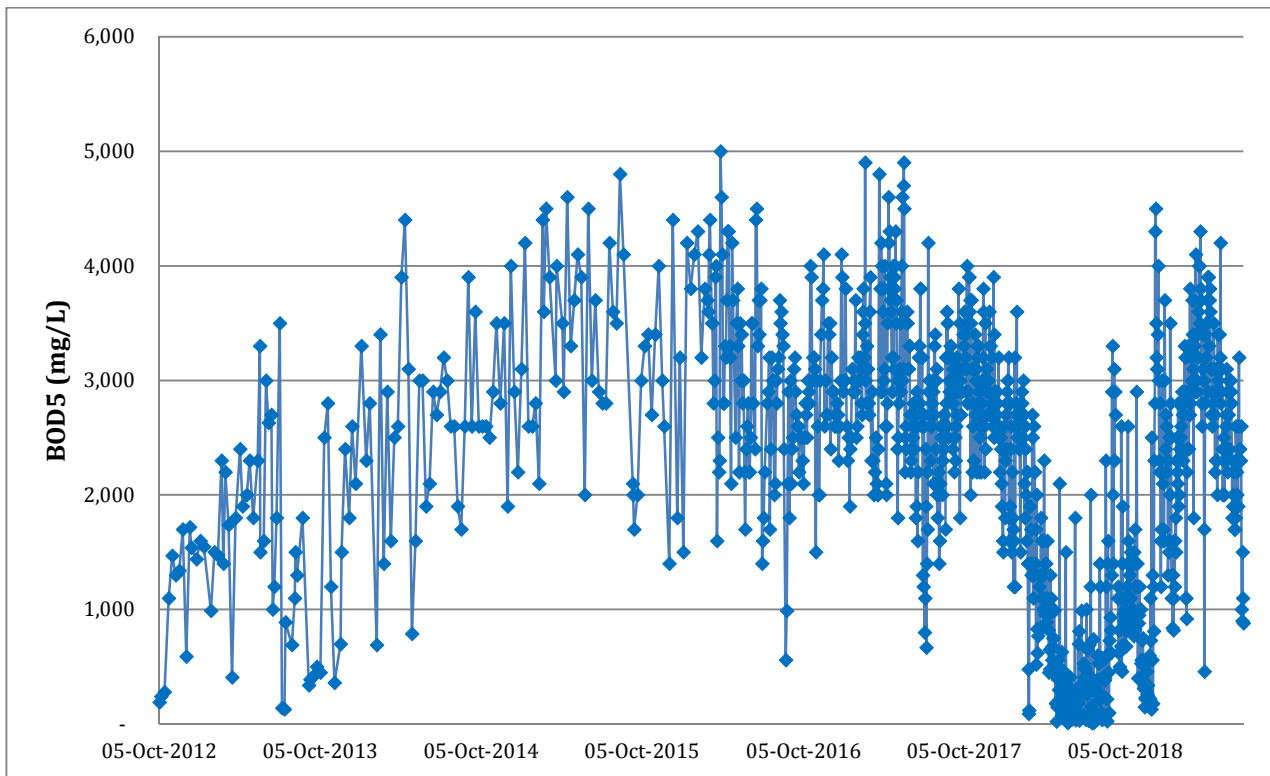


Figure 8: Biological Oxygen Demand in effluent – historical trend

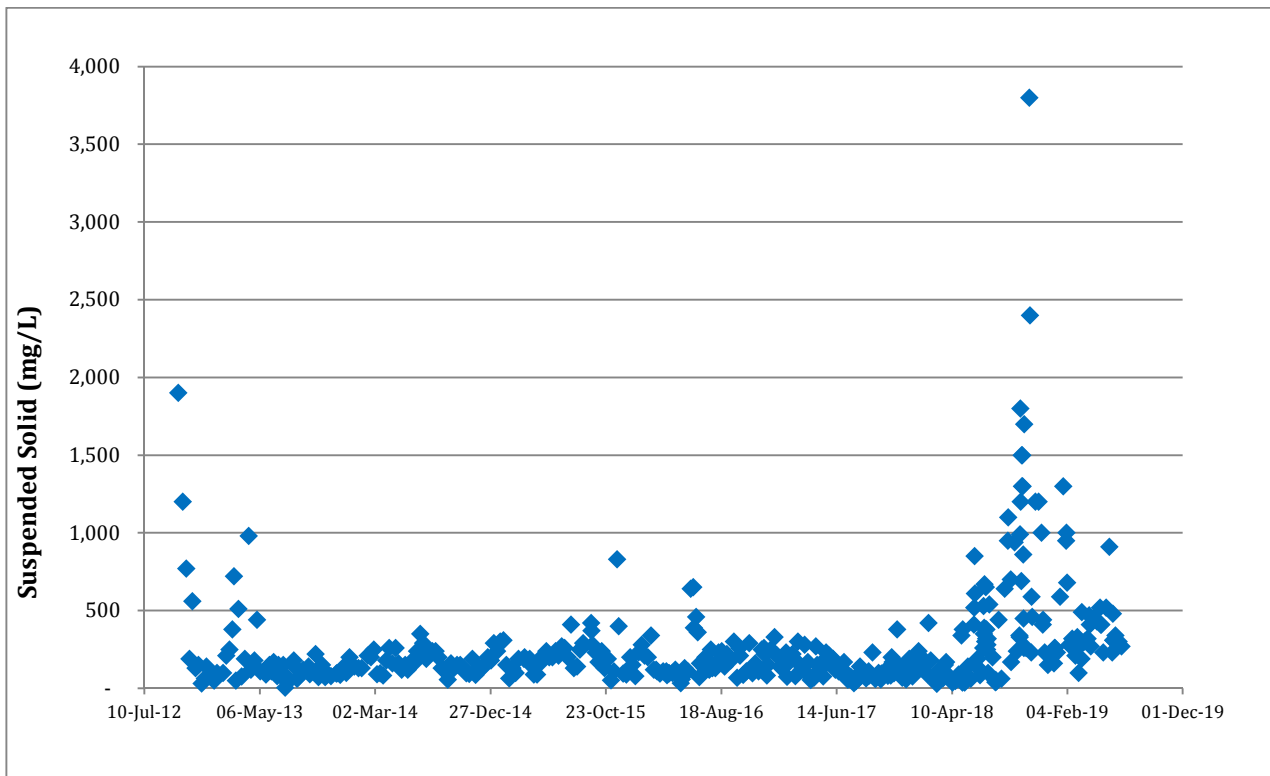


Figure 9: Suspended solids in effluent – historical trend

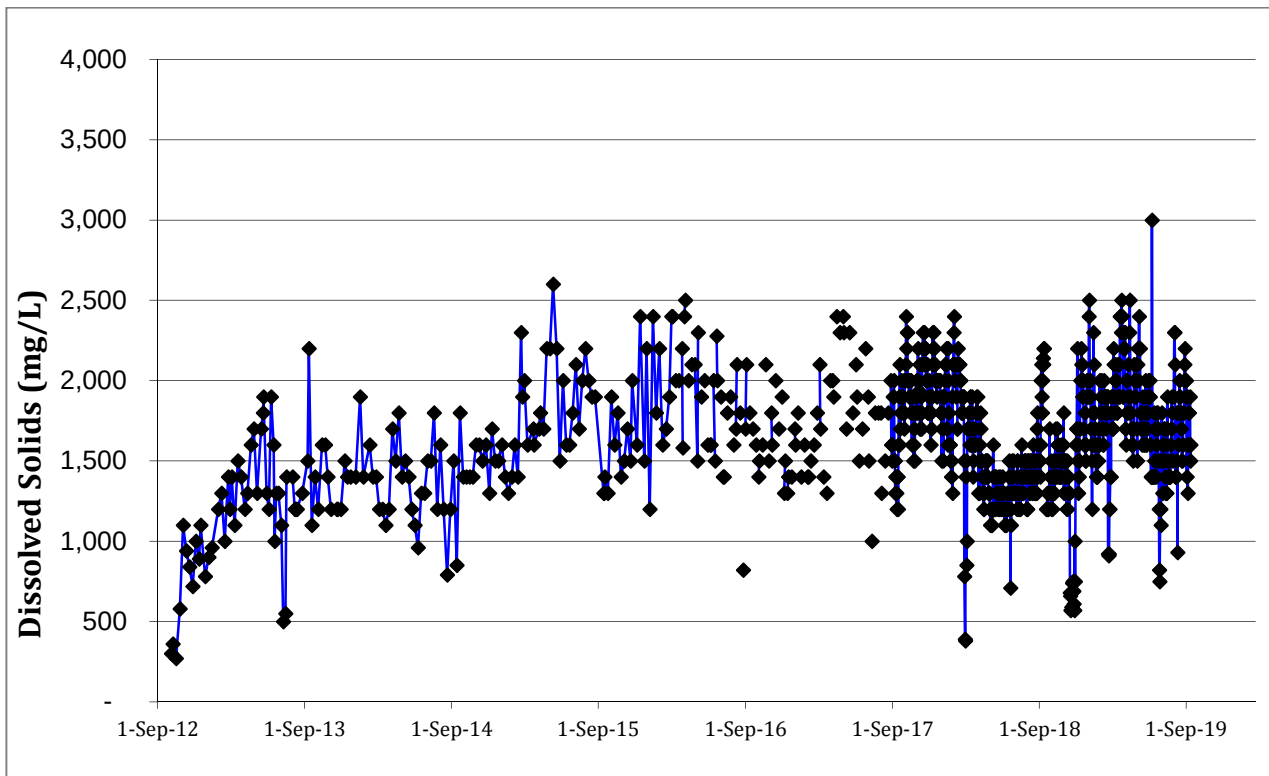


Figure 10: Total dissolved solids in effluent – historical trend

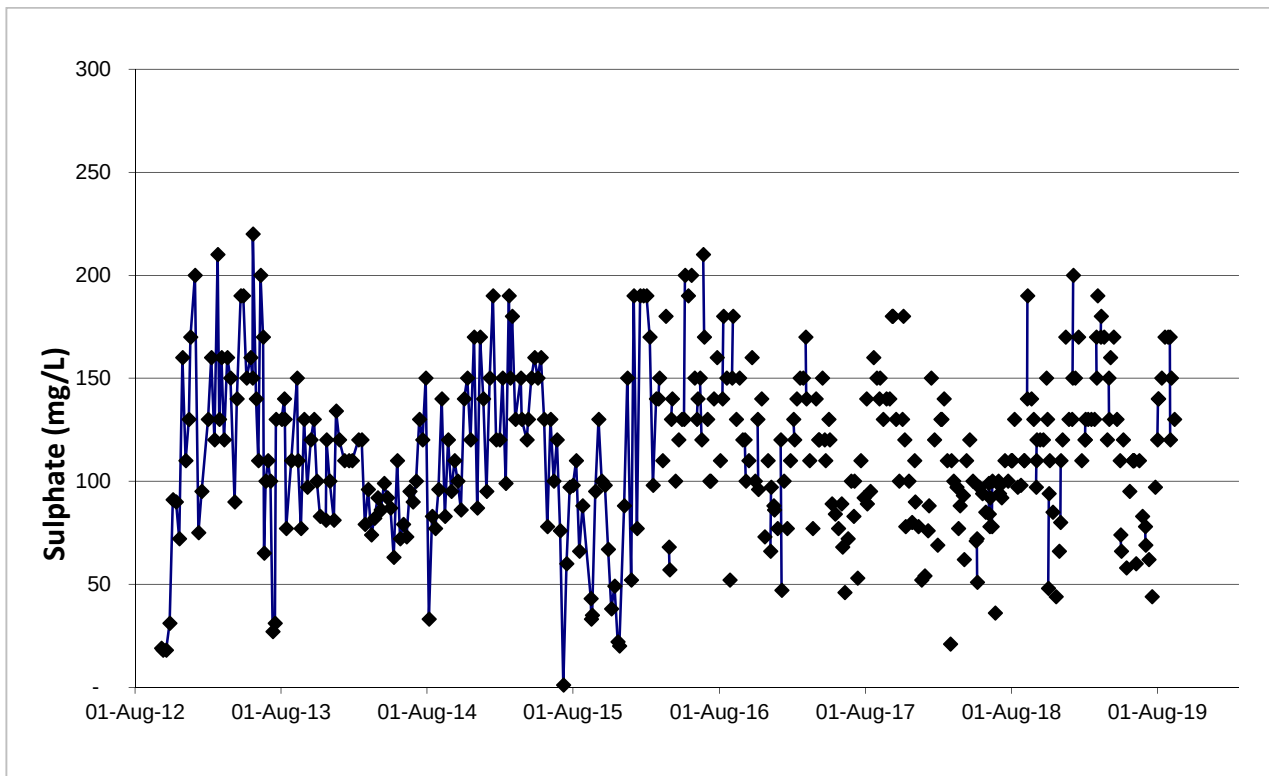


Figure 11: Sulphate in effluent – historical trend

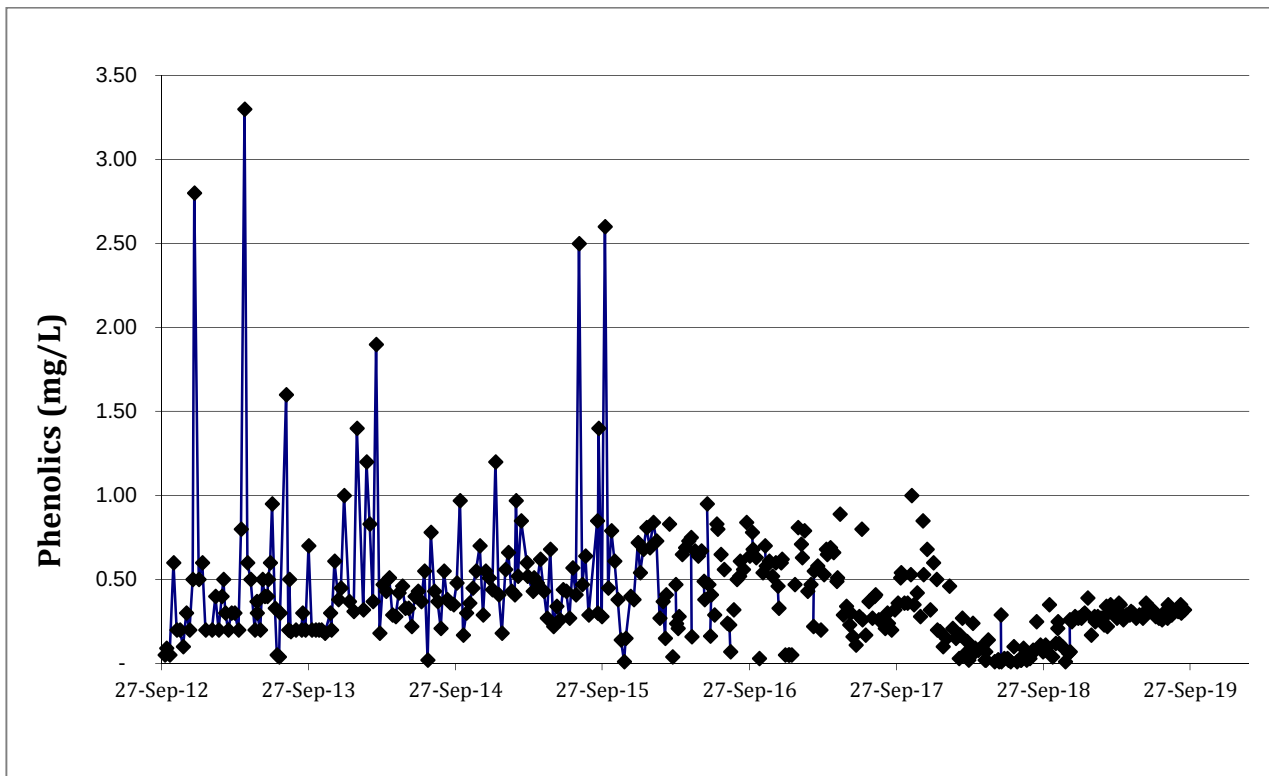


Figure 12: Phenolic compounds in effluent – historical trend

2.4 NSW EPA Environmental Protection Licence (EPL)

The Annual return for the Botany Mill EPL 1594 was submitted in April 2019 as required. All operating limits were compliant, however one noise monitoring report was submitted three weeks later than required by the licence.

2.5 Traffic

Table 10: Predicted and current daily traffic performance

Parameter	Approved project (From Mod 2)	Predicted Traffic Volumes Mod 7	Current performance
Waste Paper Deliveries:			
B-Doubles	4	11	11
Semi-Trailers	31	35	36
Rigids (< 15 tonne loads)	147	65	65
Total	182	111	111
Starch/Chemicals Deliveries:			
Semi-Trailers	2	3	3
Finished Product Despatch:			
B-Doubles & HPV's*	16	12	12
Semi-Trailers	31	34	34
Total	47	46	46
Solid Waste Removal:			
Truck and Dog Trailer	6	7	0
Semi-trailer	N/A	N/A	10
General Waste:			
Rigids (Front load, hook bins etc.)	1	1	1
Total Heavy Vehicles	238	168	171

The increased traffic figures for solid waste removal are due to the addition of one semi-trailer load of aerobic biomass removal from the secondary water treatment plant each day, which was not predicted in Modifications 2 or 7, and a change in vehicle type for the remainder. Current performance is still well below the vehicle numbers predicted in Modification 2.

2.6 Waste

The Waste Management Plan was updated in March 2019 and submitted to the Secretary in April 2019.

Table 11: Comparison of predicted and actual waste generation.

Waste	Waste Management Plan	Current Performance	Management
Coarse Rejects	47,000 T	36,500 T	Landfill
Fine Rejects	36,000 T	32,300 T	Composting and re-use as soil improver under EPA exemption
Aerobic Biomass	9,000 T	2,900 T	Composting and re-use as soil improver under EPA exemption
Waste Oil	20,000 L	9,600 L	Recycled

Orora received a Resource Recovery Exemption and Order for the biomass to be used as a soil amendment material in February 2019. Prior to that it was taken to a licenced composting facility.

Generation of coarse reject and fine rejects per gross tonne of paper production has reduced over time, as shown in Figure 13.

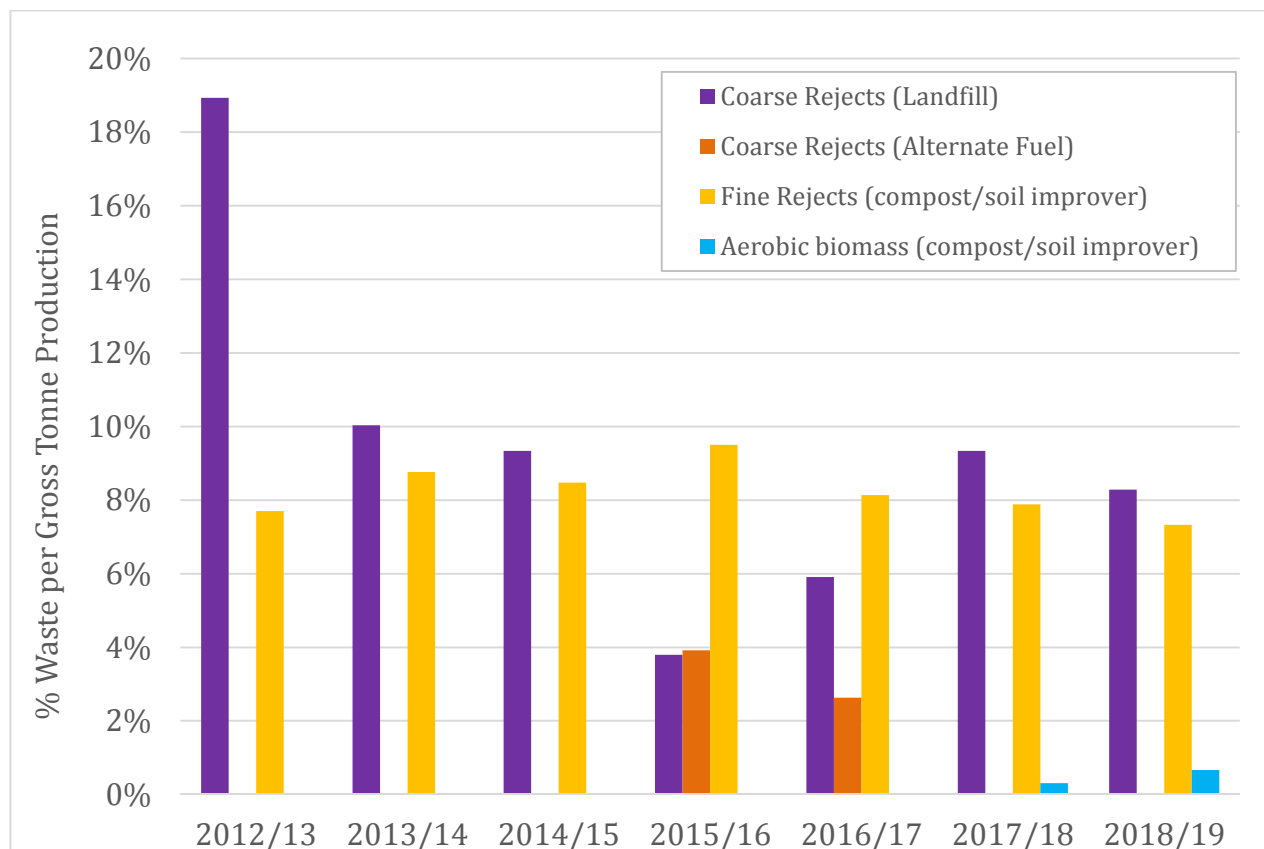


Figure 13: Historical Process Waste Data

2.7 Contaminated Land Management

The Site Audit Report and Statement for Site Audit Notification 100-4 was submitted to the NSW EPA on 15th August 2018.

Inspections were carried out at the following frequencies:

Remediated Land Landscaping Inspection	2-monthly
Ground Floor Slab & Exterior Pavement Condition	Annual
Metals containment cell – Capping integrity & leachate level	Annual

All audits have shown good integrity of all remediated land, pavement, slab and capping. There were no accidental breaches or penetration of the capping requirements. There was no water ingress observed in the metals containment cell.

3 Non-compliances

Total number of non-compliances: 3

Unique ID	Schedule 3,1
Compliance Requirement	The Applicant must ensure that the Development complies with Section 129 of the Protection of the Environment Operations Act, 1997. 'Section 129 of the POEO Act 1997, provides that the Applicant must not cause or permit the emission of any offensive odour from the site, but provides a defence if the emission is identified in the relevant environmental protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.
Details of non-compliance	Odour generated by commissioning issues associated with the secondary water treatment plant. 31 odour complaints during 2018, 2 complaints year-to-date in 2019.
Agency to which non-compliance was reported	Complaints not due to a reportable incident, but during commissioning of the plant. Complaints and action discussed with NSW EPA.
Response taken/proposed	Odour complaints received and actions taken to avoid re-occurrence of individual events. Feedback given to complainants at the time of each complaint. Secondary water treatment plant stopped and a significant amount of anaerobic biomass removed in early 2019.

Unique ID	schedule 3,6
Compliance Requirement	All chemicals, fuels and oils must be stored in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. The bund(s) must be designed and installed in accordance with: a) the requirements of all relevant Australian Standards; and b) the DECC's Environmental Protection Manual Technical Bulletin Bunding and Spill Management.
Details of non-compliance	Small diesel tanks for emergency fire system pumps are not bunded. There have been no spill incidents, however the tank design was audited and one unbunded tank was reported in Environmental and Compliance Audit, August 2016. Further checks of the area in 2019 found two additional small diesel tanks for the emergency fire pumps that are not bunded.
Agency to which non-compliance was reported	Reported in the Independent Environmental Audit sent to the Department of Planning in May 2019.
Response taken/proposed	Project in progress to bund tanks. Expected completion July 2020.

Unique ID	Schedule 4, 36
Compliance Requirement	Within 3 months of: a) an annual independent environmental audit submitted under Condition 30; b) an incident report submitted under Condition 33; or c) the Consent of a modification to the Development Consent, the Applicant must review, and if necessary revise, the strategies, plans and programs required under this Consent to the satisfaction of the Secretary.
Details of non-compliance	Not all strategies, plans and programs were revised after each consent of modification.
Agency to which non-compliance was reported	Reported in the Independent Environmental Audit sent to the Department of Planning in May 2019.
Response taken/proposed	Discuss with Department compliance team as to what is required to satisfy this condition. To what extent to the strategies, plans and programs need to be reviewed, and how can Orora get clarification that these reviews are "to the satisfaction of the Secretary". Discuss by December 2019.

4 Previous report actions

There are no actions from previous reports, however the action table from the Independent Environment Audit conducted during the reporting period is included below. See Table 12 below.

Actions from this table will be completed over the next two reporting periods.

Table 12: Independent Environment Audit Report Recommendations

Recommendation	Non-compliance (Y/N)	Priority ^a	Response/Actions to be taken	By when	Completed
1. Revise Stormwater Management Plan and Stormwater Sampling and Testing procedure as recommended in the Golder report, namely: a) inclusion of TRH & BTEXN in stormwater monitoring analytes b) addition of QC samples c) sampling after non-routine events such as fire or large spills.	N	Medium	Stormwater Sampling and Testing Procedure modified to include the recommendations.	1/10/2019	9/07/2019
2. Include a reference to local guidelines (such as Vic EPA Pub. No.IWRG701) in the Sampling and Testing procedure so that samplers will have access to reliable information on sample storage, holding times and LOR selection, etc. in order to meet required quality parameters.	N	Low	Determine whether these references are required or already covered by the Sampling and Testing procedure.	1/06/2020	
3. All future stormwater quality monitoring should be undertaken in the context of the recently revised ANZECC & ARMCANZ National Water Quality Management Strategy Guidelines. In particular, the application of specific jurisdictional (NSW) information on the trigger levels to be used for receiving waters. The revised guidelines can be accessed at www.waterquality.gov.au .	N	Medium	Review Guidelines and determine which sections are appropriate for addition to the Stormwater Management Plan and Sampling and Testing Procedure.	1/01/2020	
4. Include the clean out of the site's stormwater treatment devices in the preventative maintenance schedule.	N	High	Site stormwater treatment devices included in the preventative maintenance schedule. Close out proof (eg photos or observations/comments) to be added when jobs are complete.	1/06/2019	
5. Investigate the possibility of having the groundwater meters periodically calibrated to confirm they are correctly measuring the volume of groundwater being pumped (within the acceptable error of the meter being used).	N	Medium	Investigate whether these type of water meters require calibration. Water meters are geared, so may require checking rather than calibration. Put in place preventative maintenance schedule for calibration/checking as appropriate for these instruments.	1/06/2020	
6. Cease the use of temporary bunding for large chemicals containers once the chemicals store is completed for use.	Y Schedule 3, Condition 6	High	Transfer of chemicals occurring from temporary bunds to chemical store. Temporary bunding will continue to be used for short-term chemical use.	In progress	
7. Finalise the bunding of the fire pump diesel tanks.	Y Schedule 3, Condition 9(b)	High	Permanent bunding of fire pump diesel tanks in progress with the site project team.	1/12/2019	
8. Amend the Trade Waste procedure to: a) include cross-references to the Trade Waste permit, in particular Schedule 4; and b) include a specific section on flow meter calibration that includes the requirement for annual calibration and lodgement of the certificate with Sydney Water within one month.	Y Schedule 3, Condition 9(b)	High	Add suggested recommendations to Trade Waste Procedure, and requirement for flow meter calibration to Environmental Compliance Obligations document.	1/06/2019	1/07/2019
9. Orora's acoustic consultants need to include a statement in their noise monitoring reports as to compliance with the L_{Aeq} limit over the period being monitored.	N	Medium	Acoustic consultants have agreed to include compliance statement as recommended in quarterly noise monitoring reports.	1/10/2019	
10. The steam release alarm, and action to confirm release noise, needs to be included in the Operational Noise Management Plan under s.4.1 & 4.2, and in s.5 as appropriate. The ONMP should be the primary noise management document for the site and be a 'living' document, to be reviewed and revised as required as conditions change.	N	Low	Add steam release alarm as a noise control device in the Operational Noise Management Plan as recommended.	1/06/2020	
11. Develop and implement a documented works program in consultation with the gardening contractor for the maintenance (and if necessary, improvement) of landscape treatments across the site.	N	Low	Investigate whether a documented works program is beneficial with the gardening contractor. Put together a scope of work.	1/07/2020	
12. Continue to develop the integrated management system for the site to include all elements of the 14001 Standard.	N	Medium	On-going. 90% implementation complete.	1/07/2020	
13. Report all exceedances of limits/performance criteria contained within the Project Approval to the Department of Planning and Environment within 7 days.	Y Schedule 4, Condition 33	High	Discuss whether reporting of all odour complaints are required with the Department of Planning compliance team. Implement requirements as discussed.	1/06/2019	
14. Include the requirements of Condition 36 - Revision of Strategies in Orora's Audit, and Incident Response procedures, and its Legal and other requirements Compliance Register.	Y Schedule 2 (MOD 6), Condition 11	High	Discuss the requirements for this condition with the Department of Planning compliance team and implement those requirements.	1/06/2019	
15. Seek clarification from EPA as to the acceptability of having some water quality analytes tested using NATA-certified in-house methods rather than the equivalent APHA method as specified in the EPA's Approved Methods publication.	N	Medium	Discuss recommendation with EPA and implement as required.	1/06/2020	
16. Expand the monthly onsite field odour observation to include additional observation locations at the downwind site boundary, with these observations taken before the commencement of the shift by screened office-based staff to avoid the potential for these staff to become desensitised to the odour specific to the plant. A minimum of two Orora office-based staff be successfully screened for sensitivity to odours to AS4323.3.	N	Medium	The addition of 3-monthly formal odour field measurements will be made to the monthly odour walk-around in neighbouring areas. Onsite odour observations are no longer required, as all odour complaints received were related to biogas safety relief valve releases. The Environment Manager will be screened for sensitivity to odours, with consideration to be given to a suitable second person.	1/06/2019	
17. Install gas-detection meters (methane and hydrogen sulphide) at the location of the biogas pressure relief valves (if plausible) to provide instantaneous warning to control room staff of these being actuated so that steps to relieve biogas pressure may be initiated promptly.	N	High	Determine whether this is feasible.	1/12/2019	
18. Install a system at the flare to provide instantaneous warning to control room staff of the flare tripping so that re-ignition may be initiated promptly.	N	High	System already has alarms and automatic re-start systems installed. Currently working through issues that occasionally prevent system from re-igniting (eg automated condensate removal).	Complete	
19. Continue to engage with specialist engineers to develop and implement rectification works and biogas management strategies to complete the commissioning of this waste water treatment and co-generation plant. Until these issues are rectified continue to manage the levels of biogas produced to the current low levels that are demonstrated to minimise the risk of notable odorous emissions to air.	Y Schedule 3, Condition 1	High	On-going	1/03/2020	
20. Repeat the field odour survey by the independent consultant when the Secondary WTP and co-generation plant are operating as designed at full capacity to validate that no offensive odours are at and beyond the site boundary.	N	Medium	Will be booked in once SWTP back at full capacity.	1/07/2020	
21. Continue to seek community feedback on the incidence and frequency of offensive odours (if any), and to communicate progress with the Secondary WTP commissioning and operation.	N	High	Each mill newsletter that is sent out has the Environment hotline number on it for feedback. The question regarding any noticeable odours in the area is asked of the community liaison group at each meeting.	Complete	
22. Retain historical wind speed and direction data from Bureau of Meteorology Automatic Weather Station (BoM AWS) at Sydney Airport to inform the investigation of historical or current community complaints of odour dis-amenity.	N	Low	Wind speed and direction data is recorded from the BOM at Sydney Airport or Little Bay and recorded at the complaint time to help with the investigation of each complaint.	Complete	
23. Modify the SHE system to readily provide a summary of incident information for specific environmental pathways (e.g. odour, noise, visual dis-amenity, litter, etc) for information, action and learning.	N	Medium	SHE is a generic company-wide program, with little scope for modifications, however all actions and learnings are recorded in the SHE system. Botany Mill will continue to keep supplementary records for ease of reporting requirements.	Complete	
24. The emission to air testing for combustion gases emitted to air from the bio-gas fuelled engine be continued after the technical faults with the Secondary WTP and the co-generation plant have been rectified to validate compliance of these emissions with the approval criteria for oxides of nitrogen, carbon monoxide and sulphur dioxide.	Y Schedule 2 (MOD 6), Condition 5	High	Seek advice from biogas engine experts (maintenance and operation) as to settings/conditions that need to be adjusted for compliance to air emissions approval criteria before the biogas engine is re-started. Perform emissions testing as soon as practical once biogas engine is re-started and under steady operation. Adjust biogas engine as needed.	1/06/2019	

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

5 Incidents

There were no incidents that caused (or threatened to cause) material harm to the environment during the reporting period.

6 Community Contacts

6.1 Complaints

During the reporting period, B9 received 26 complaints via the Orora Environment Hotline and the EPA.

These complaints were divided between the following categories:

- Noise: 2 complaints
- Odour: 21 complaints
- Trees: 0 complaints
- Other: 3 complaints

The noise complaints were due to a starch delivery being made early on a public holiday (7:26am instead of after 8am), and vacuum truck cleaning occurring during the night when the plant was shut. Each complaint was actioned at the time the complaint was received.

Nineteen of the twenty-one odour complaints were received in 2018, with the majority of those being directly related to the commissioning of the secondary water treatment plant and biogas releases through the safety relief valves. These were caused by the flare tripping and biogas control issues. In mid-December the secondary water treatment plant was shut down temporarily to remove excess biomass, and since early January 2019 Orora has been working collaboratively with Sydney Water wastewater and biogas engineers and an expert team from Veolia to improve the design and control of the biogas system. There have been no odour complaints related to the secondary water treatment plant since January 2019.

The three “other” complaints were related to litter being blown over the boundary wall. This was due to changes to infrastructure on site, and has been rectified with additional fencing.

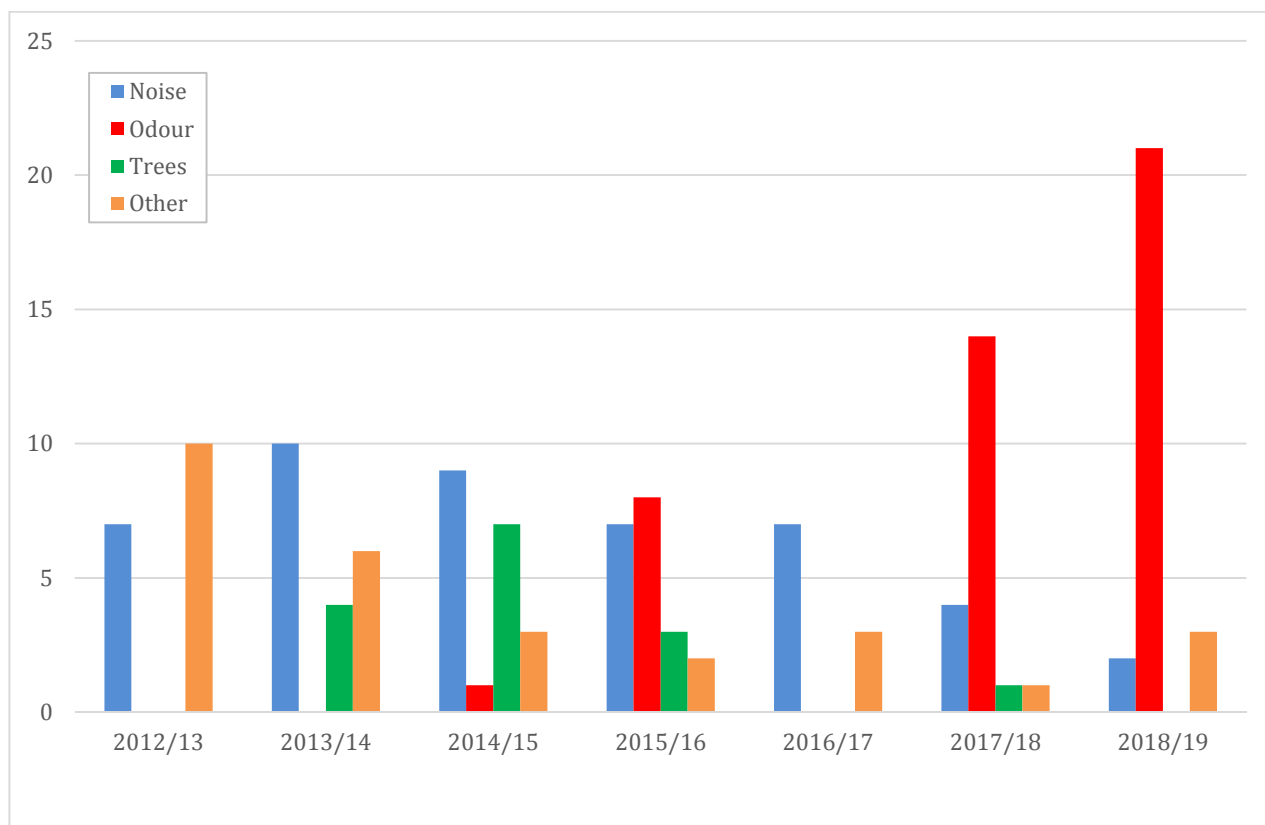


Figure 14: Historical Complaints to Mill and EPA

6.2 Community Liaison group meetings

Community Liaison group meetings were held on the following dates:

- November 29th, 2018
- March 19th, 2019

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

Minutes from each meeting have been posted on the Orora website www.ororagroup.com

6.3 Community Notifications

Two community update flyers were sent to neighbouring residences in December 2018 and May 2019.

The flyers detailed the following works on site:

- Extension of the noise wall
- Demolition of the B7 reel store
- Construction of additional hardstand and warehousing

Community update flyers are also posted on the Orora website www.ororagroup.com

7 Compliance Report Declaration Form

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

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

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

Notes:

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

Name of Authorised Reporting Officer
Title
Signature
Qualification
Company
Company Address

Karen Jones
Environment, Testing & Management Systems Manager

Bachelor of Engineering, Chemical
Orora
1891 Botany Road, Matraville 2036

Compliance Table

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Schedule	Unique ID	Compliance Requirement	Development phase	Monitoring methodology	Evidence & comments	Compliance	Details of non-compliance
Schedule 2: Administrative Conditions	Schedule 2, 1	The Applicant must implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction and/or operation of the Development.	Operation	Environmental Management System	Environmental Management System records	Compliant	N/A
	Schedule 2, 2	The Applicant must carry out the Development generally in accordance with the: a) EA b) site plan contained in Appendix A c) submissions report d) statement of commitments; and e) Modification application 05_0120 Mod 2 with supporting documents titled Environmental Assessment Report: B9 Development - New Paper Mill - Revised Modification #2, Subdivision and Site Layout, 16 February 2010, prepared by SKM and Response to Submissions from Exhibition of Environmental Assessment Report, May 2010, prepared by SKM; f) Modification request 05_0120 Mod 3 with supporting documents titled New Paper Mill Modification Report #3 - Completion of McCauley Street and Botany Road / McCauley Street Intersection, dated 12 October 2012, and prepared by Sinclair Knight Merz Pty Ltd; g) Modification request 05_0120 Mod 4 with supporting documents titled New Paper Mill Modification Report #4 - completion of McCauley Street and Botany Road / McCauley Street Intersection and use of B-Doubles on McCauley Street, dated January 2013, and prepared by Sinclair Knight Merz Pty Ltd; h) Modification request 05_0120 Mod 5 with supporting documents titled Modification Report - Demolition of B7 and Minor Subdivision, dated November 2014, prepared by Jacobs Group (Australia) Pty Ltd and Submission Report - Modification #5, dated 29 May 2015, prepared by Jacobs Group (Australia) Pty Ltd and statement of commitments for MP 05_0120 Mod 5 contained in Appendix B; and i) conditions of this Consent; j) Modification request 05_0112 MOD 7 and accompanying Environmental Assessment Report, dated August 2016 and prepared by Consultifra; k) Modification application 05_0120 MOD 8 and supporting documentation titled Statement of Environmental Effects - Reel Store Demolition & Extension of Noise Barrier, dated 4 June 2018, prepared by Elton Consulting and; B7 Reel Store Demolition & Extension of Noise Barrier Response to DPE Request for information, dated 1 August 2018, prepared by Elton Consulting; l) Modification application 05_0120 MOD 9 with supporting documentation titled Environmental Assessment Report - Modification #9 - Increase in Paper Mill Maximum Production dated 10 May 2019 and Response to Submissions dated 28 June 2019 both prepared by Elton Consulting.	Operation	As described throughout table.	Works and reports submitted as required.	Compliant	N/A
	Schedule 2, 3	If there is any inconsistency between the plans and documentation referred to in Condition 2 above, the conditions of this Consent, then the most recent documents must prevail to the extent of the inconsistency	Operation	N/A	N/A	Compliant	N/A
	Schedule 2, 4	The Applicant must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this Consent; and b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.	Operation	Requests sent to Orora email address.	Requests for information are fulfilled.	Compliant	N/A
	Schedule 2, 5	The Applicant must ensure that the Development does not produce more than 500,000 tonnes of paper per annum	Operation	Daily/monthly/annual production records.	Annual production has not exceeded 500,000 Tonnes of paper.	Compliant	N/A
	Schedule 2, 6	With the Consent of the Secretary the Applicant may submit any management plan or monitoring program required by this Consent on a progressive basis.	Operation	N/A	N/A	Compliant	N/A
	Schedule 2,13	The Applicant must ensure that all plant and equipment used on the site is maintained and operated in an efficient manner, and in accordance with relevant Australian Standards.	Operation	Maintenance Program in SAP. Statutory requirements for maintenance entered into SAP for automatic reminders. Continuous improvement program for operational efficiency.	Pressure vessel checks. Electrical safety management plan lodged with Ausgrid, maintenance records in SAP.	Compliant	N/A
	Schedule 3,1	The Applicant must ensure that the Development complies with Section 129 of the Protection of the Environment Operations Act, 1997. Section 129 of the POEO Act 1997, provides that the Applicant must not cause or permit the emission of any offensive odour from the site, but provides a defence if the emission is identified in the relevant environmental protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	Operation	Monthly odour observations, water quality testing, complaint recording/monitoring.	31 odour complaints in 2018, 2 complaints year-to-date in 2019. Ongoing biocide program for water quality control.	Non-compliant	Odour generated by commissioning issues associated with the secondary water treatment plant. Odour complaints received and actions taken to avoid re-occurrence of events.
	Schedule 3,2	During the life of the Development, the Applicant must carry out all reasonable and feasible measures to minimise the dust generated by the Development.	Operation	Complaints monitoring. Construction/demolition work to include dust management strategies.	Any piles of material likely to cause dust is wet down at appropriate frequencies.	Compliant	N/A
	Schedule 3,3	Except as may be expressly provided in an EPL for the Development, the Applicant must comply with Section 120 of the POEO Act 1997	Operation	Stormwater sampling.	Stormwater separators installed. Stormwater Management Procedure.	Compliant	N/A
	Schedule 3,6	All chemicals, fuels and oils must be stored in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. The bund(s) must be designed and installed in accordance with: a) the requirements of all relevant Australian Standards; and b) the DECC's Environmental Protection Manual Technical Bulletin Bunding and Spill Management.	Operation	Regular bunding audits. Approval system for introduction of new chemicals on site.	Audit reports. Chemical Approval documents.	Non-compliant	Small diesel tanks for emergency fire system pumps are not bunded. Project in progress to bund tanks.

Schedule 3, 9	The Applicant must prepare and implement a Water Management Plan for the site to the satisfaction of the Secretary. The Plan must: a) be submitted to the Secretary for approval prior to commencement of operation; b) include: * a Water Supply Strategy for the site including a report on the sustainability of groundwater extraction from the Shape Park borefield and the impact on the Botany Sands Aquifer. The strategy should also assess options for alternative water supply, and should be undertaken in consultation with the DWE; * A Stormwater Management Scheme for the site that has been prepared in accordance with the requirements of Sydney Water and Council, and generally in accordance with the Managing Urban Stormwater: Council Handbook (DECC); * a Wastewater System for the site prepared in accordance with the requirements of Sydney Water. The system should include details of discharge rates, wastewater quality and automated controls for monitoring discharges to the Southern and Western Sydney Ocean Outfall Sewer (SWSOOS).	Construction/Operation	As per Operational Trade Waste Management Procedure, Storm water management procedure, monthly bore water flow checks and original documentation submitted prior to commencement of operation.	Compliant	N/A																																										
schedule 3,10	The Applicant must ensure that noise from the operation of the Development does not exceed the noise limits presented in Table 1: <i>Table 1: Project Noise Limits</i> <table> <tr> <th>ID</th><th>Location</th><th>Day L_{Aeq} (15 minutes) dB(A)</th><th>Evening L_{Aeq} (15 minutes) dB(A)</th><th>Night L_{Aeq} (15 minutes) dB(A)</th><th>Night L_{max} dB(A)</th></tr> <tr> <td>R1</td><td>Cnr. McCauley St and Australia Ave</td><td>46</td><td>45</td><td>43</td><td>55</td></tr> <tr> <td>R2</td><td>Australia Avenue</td><td>45</td><td>45</td><td>43</td><td>55</td></tr> <tr> <td>R3</td><td>Murrabin Avenue</td><td>46</td><td>45</td><td>43</td><td>55</td></tr> <tr> <td>R4</td><td>Partanna Avenue</td><td>42</td><td>41</td><td>41</td><td>55</td></tr> <tr> <td>R5</td><td>Cnr. Partanna and Moorina Avenues</td><td>42</td><td>42</td><td>39</td><td>55</td></tr> <tr> <td>R6</td><td>Moorina Avenue</td><td>43</td><td>43</td><td>39</td><td>55</td></tr> </table>	ID	Location	Day L _{Aeq} (15 minutes) dB(A)	Evening L _{Aeq} (15 minutes) dB(A)	Night L _{Aeq} (15 minutes) dB(A)	Night L _{max} dB(A)	R1	Cnr. McCauley St and Australia Ave	46	45	43	55	R2	Australia Avenue	45	45	43	55	R3	Murrabin Avenue	46	45	43	55	R4	Partanna Avenue	42	41	41	55	R5	Cnr. Partanna and Moorina Avenues	42	42	39	55	R6	Moorina Avenue	43	43	39	55	Operation	Quarterly noise monitoring. Requirement noted on "Environmental Annual Calendar - Reporting and Monitoring requirements" BW-13022	Compliant	N/A
ID	Location	Day L _{Aeq} (15 minutes) dB(A)	Evening L _{Aeq} (15 minutes) dB(A)	Night L _{Aeq} (15 minutes) dB(A)	Night L _{max} dB(A)																																										
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R5	Cnr. Partanna and Moorina Avenues	42	42	39	55																																										
R6	Moorina Avenue	43	43	39	55																																										
Schedule 3, 10F	The Applicant must prepare a Long-term Noise Barrier Plan for the Development. The Plan must: a) identify the Applicant's long-term plan for noise mitigation to nearby sensitive receivers; b) address the planning and implementation strategy for the long-term noise barrier solution, including timeframes for implementation; c) include a procedure for the removal of all or part of the noise barrier if new structures are erected on the site which would perform a suitable noise attenuation function; d) be prepared in consultation with the Department, EPA and Council; and e) be submitted to the Department by 30 June 2021 for Consent by the Secretary.	Construction/Operation	N/A	Not triggered	N/A																																										
schedule 3,12	The Applicant must ensure that noise from reversing alarms is minimised at all times.	Operation	Monthly noise observations, complaint recording/monitoring.	Compliant	N/A																																										
Schedule 3, 14A	Within three months of the installation of the Stage 2 Noise Barrier, the Applicant must submit a Noise Verification Study to the Secretary. This study must: a) be undertaken by a suitable qualified acoustic expert and in accordance with the NSW Industrial Noise Policy; b) validate the predictions made in the EA and supporting documents for MP 05_0120 Mod 5; c) demonstrate compliance with the noise limits in Table 1 of Conditions 10; and d) describe the contingencies that would be implemented, and the timing for implementation, should non-compliances be detected.	Demolition	N/A	Not triggered	N/A																																										
Schedule 3, 14C	Within three months of completion of works associated with 05_0120 MOD 8 the Applicant must submit an updated Noise Verification Study required by Condition 14A. The updated study must: a) be undertaken by a suitable qualified acoustic expert in accordance with the Noise Policy for Industry 2017; b) validate the predictions made in the SEE and supporting documentation for 05_0120 MOD 8; c) demonstrate compliance with the limits in Table 1 of Condition 10; d) describe the additional noise mitigation measures that would be implemented and the timing for implementation should non-compliances be detected; and e) be submitted to the Department for Consent by the Secretary.	Demolition	N/A	Not triggered	N/A																																										
schedule 3, 20	The Applicant must ensure that: a) the internal road network and parking on site complies with the Australian Standards AS 2890.1:2004 and AS 2890.2:2002; b) site related vehicles do not queue on any public roads; c) heavy vehicles are restricted from using McCauley Street north of Raymond Avenue; and d) any changes to site access, including new access points and closure of existing access points are notified to the Secretary prior to commencement of operation.	Operation	McCauley street exit designed for right-hand turn only.	Compliant	N/A																																										
schedule 3, 24	The Applicant must prepare and implement a Operational Hazard Plan for the site to the satisfaction of the Secretary. This plan must: a) be prepared by a suitably qualified independent person approved by the Secretary; b) be submitted for Consent prior to the commencement of commissioning; and c) include a: "Emergency Plan that has been prepared in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No.1 - Industry Emergency Planning Guidelines and * Safety Management System covering all on-site operations and associated transport activities involving hazardous materials. The Safety Management System must be developed in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 9 - Safety Management.	Operation	Hazard audit completed in 2019. Botany Mill Safety Management System. Botany Mill Emergency Plan	Compliant	N/A																																										
Schedule 3, 24E	Twelve months after the commencement of operation of the upgraded WTP and every three years thereafter, or at such intervals as the Secretary may agree, the Applicant must carry out a comprehensive Hazard Audit of the facility as modified and within one month of each audit, submit a report to the Secretary. The audit must be carried out at the Applicant's expense by a qualified person or team, independent of the Development, approved by the Secretary prior to commencement of the audit. The Hazard Audit must be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No 5, "Hazard Audit Guidelines". The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.	Operation	Audit conducted by an Independent Auditor approved by the Secretary.	Compliant	N/A																																										

Compliance Table

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Schedule 3, 24F	The Applicant must comply with all reasonable requirements of the Secretary in respect of the implementation of any measures arising from the reports submitted in respect of conditions 24A to 24E inclusive, within such time as the Secretary may agree.	Operation	Response submitted to requests as required.	Response submitted to requests as required.	Compliant	N/A
Schedule 3, 25	The Applicant must ensure that all waste generated on the site during demolition, construction and operation of the Development is classified in accordance with the DECC's Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes and disposed of to a facility that may lawfully accept the waste.	Operation	Waste Management Plan	Waste Audits	Compliant	N/A
Schedule 3, 27	For the life of the Development, the Applicant must: a) Monitor the amount of waste generated by the Development; b) Investigate ways to minimise waste generated by the Development; and c) Implement reasonable and feasible measures to minimise waste generated by the Development to the satisfaction of the Secretary.	Operation	Waste Management Plan	Waste records	Compliant	N/A
Schedule 3, 28	The Applicant must prepare and implement an Energy Savings Action plan for the Development to the satisfaction of the Secretary. This plan must be prepared in accordance with the requirements of the DWE and the Guidelines for Energy Savings Action Plans, DEUS 2005, and be submitted to the Secretary for Consent.	Operation	Monthly energy and greenhouse gas monitoring/tracking.	Electricity and gas intensity reductions since commissioning	Compliant	N/A
Schedule 4, 29	The Applicant must prepare and implement an Environmental Management Strategy for the Development, the satisfaction of the Secretary. This strategy must be submitted to the Secretary prior to the demolition commencing. The plan must be updated as required throughout construction and must: a) provide the strategic context for environmental management of the Development; b) identify the statutory and other obligations that apply to the Development; c) describe the role, responsibility, authority and accountability of all the key personnel involved in environmental management of the Development; and d) describe the procedure that would be implemented to: * Keep the local community and relevant agencies informed about the construction, operation and environmental performance of the Development; * Receive, handle, respond to, and record complaints; * resolve any disputes that may arise during the course of the Development; * respond to any non-compliance * report on monitoring results; and * respond to emergencies.	Operation	Environmental Management System	Legal compliance register, community liaison group meetings, community update newsletters, 24-hour complaints hotline, emergency procedure	Compliant	N/A
Schedule 4, 30	Within one year of the commencement of operations, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission an Independent Environmental Audit for the Development. This audit must: a) be carried out by a suitable qualified, experienced and independent audit team, that contains an odour specialist, noise expert and wastewater specialist, whose appointment has been endorsed by the Secretary; b) assess the environmental performance of the Development; c) assess whether the Development is complying with the conditions of both this Consent and the EPL for the Development; d) review the adequacy of any strategy/plan/programme required under this Consent, and if necessary, recommend measure or actions to improve the environmental performance, and or any strategy/plan/programme required under this Consent.	Operation	Last audit conducted in 2016, therefore audit conducted during this reporting period.	Audit conducted March 2019	Compliant	N/A
Schedule 4, 31	Within two months of completing this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, with a response to any recommendations contained in the audit report.	Operation	N/A	Audit submitted to DPE May 2019	Compliant	N/A
Schedule 4, 32	Within three months of submitting the audit report to the Secretary, the Applicant must review and if necessary revise the strategy/plans/programmes required under this Consent.	Operation	N/A	Updated documents submitted to DPE July 2019	Compliant	N/A
Schedule 4, 33	Within seven days of detecting an exceedance of the limits/performance criteria in this Consent, or an incident causing (or threatening to cause) material harm to the environment, the Applicant must report the exceedance/incident to the Department, and any relevant agency. The report must: a) describe the date, time and nature of the exceedance/incident; b) identify the cause (or likely cause) of the exceedance/incident; c) describe what action has been taken to date; and d) describe the proposed measures to address the exceedance/incident.	Operation	Incident reporting system at Botany Mill. PRMP in place.	No incidents to report.	Compliant	N/A
Schedule 4, 34	Within 12 months of this Consent, and annually thereafter, the Applicant must submit an Annual Environmental Monitoring Report (AEMR) to the Secretary and relevant agencies. This report must: a) identify the standards and performance measures that apply to the Development; b) describe works carried out in the last 12 months; c) describe the works that will be carried out in the next 12 months; include a summary of the complaints received during the past year, and compare this to the complaints received in previous years; e) include a summary of monitoring results for the Development during the past year; f) include an analysis of these monitoring results against the relevant: * impact assessment criteria/limits; * monitoring results from previous years; and * predictions in the EA; g) identify any trends in the monitoring results over the life of the Development; h) identify any non-compliance during the previous year; and i) describe what actions were, or are being, taken to ensure compliance.	Operation	Requirement noted on "Environmental Annual Calendar - Reporting and Monitoring requirements" BW-13022	Annual reports submitted in September of each year for the previous financial year.	Compliant	N/A
Schedule 4, 35	Subject to confidentiality, the Applicant must make all documents required under this Consent available on a web site.	Operation	Relevant documents forwarded to Orora communications team for uploading.	Documents available on https://www.ororagroup.com/about/disclosure	Compliant	N/A
Schedule 4, 36	Within 3 months of: a) an annual independent environmental audit submitted under Condition 30; b) an incident report submitted under Condition 33; or c) the Consent of a modification to the Development Consent, the Applicant must review, and if necessary revise, the strategies, plans and programs required under this Consent to the satisfaction of the Secretary.	Operation	As required	As per Condition 32.	Non-compliant	Not all strategies, plans and programs were revised after each consent of modification.

Schedule 4: Environmental Management and Monitoring