**Response to Audit Findings Concrush**

**SSD8753**

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| **Condition** | **Proposed Action** | **Proposed Action Due Date** |
| A2. Our intention has been to comply with this consent thus we are submitting a modified consent. | Submit modified consent to Planning to address issue by due date. We have already done a first draft of our modification. | 30th June 2024 |
| A7. (NC REC 1) Our proposed modified consent addresses the green waste storage limit error. Also, A7 clause is not triggered because we are not operating at Stage 2. We believe we are complying.  Our proposed Mod is better for the environment for Concrush operation ( linking green waste water quality to dedicated green waste hardstand area – best practice) and for the community ( meeting community needs in green waste recycling volume which is an essential service for our LGA ). | Submit modified consent to address issue by due date. (We plan to submit a draft modification to Planning/EPA/Council by 20.12.2023 and obtain Mod approval by the Due Date.) We will liaise with DPE. | 29th March 2024 |
| A8. (NC REC 2) Concrush supplied the road base material required for the expansion project including the widening of Racecourse Road as per our earlier responses. We believe we have complied. ( These tonnages relate to the financial years, which is not necessarily the relevant 12 month period. To accurately assess compliance against Condition A8 it is necessary to consider the receival and processing tonnages for the 12 month period following the date of commencement of construction pursuant to SSD 8753. The audit table of in and out tonnages may not reflect the tonnages and/or exceedances for the relevant 12 month period). | No action required other than liaise with DPE. | n/a |
| A12. We believe the early removal, in mid 2020, of Groundsel weeds by track rolling was not part of our works described in the CEMP. We believe we commenced works as per our CEMP on or about 4.11.2020.  Therefore, the audit team consider the evidence of clearing activities in the aerial dated 30/06/2020 to be commencing work under the CEMP, although the audit team has not considered whether these works could have been carried out without development consent, and therefore without triggering SSD 8753. It is also questionable whether the preliminary activities carried out constitute development and/or construction works under the conditions of SSD 8753. Nonetheless, for the purposes of this IEA, and without further consideration of the other available approval pathways ( Local Government’s have the authority to routinely direct land managers to mechanically remove and commercially spray weeds as we did. Also, once the weeds were removed/sprayed the drought at the time killed the weeds off.)  We believe our operation on the expansion site will be triggered when we start processing our ballast (or raw material) on that part of the site. Our intent is to comply, and we believe we are complying. | No action required | n/a |
| B11. (NC REC 3) We believe we are complying to our WDMP or DVMP. | No action required to our Management Plans. We will liaise with EPA concerning our EPL. | 30th June 2024 |
| B13. (NC REC 4) We are looking at technology for active water monitoring. (We record one 15-minute water discharge which will be record as a volume amount in our WDVMP annual report. We have been recording water storage volumes by photographs, separate monthly recordings on our HSE Inspection form and by monthly consultant records. From now on we are centralizing these records to a single tabled spread sheet: Water Storage Volumes and Discharges.) | Implement NCREC3 by due date. We are now using a single “spread sheet”. We are also looking at installing an automatic or technology solution for water monitoring. | 30th June 2024 |
| B21. Our GMP will be updated – 30.3.2024 if required after consultant review. | Update GMP if required and submit to Planning by due date | 29th March 2024 |
| B35. (NC REC 5) Our TMP is being updated. (We have already a first draft done since June 23 which reflects onsite improvement). | Update TMP and submit to Planning by due date | 29th May 2024 |
| B45. (NC REC 6) See our proposed consent modification which removes need for noise wall. The need for a noise wall hasn’t been triggered and our Mod is a better solution for the environment). | Submit modified consent by due date. A first draft of Mod will be available to Planning/LMCC/EPA by 20/12/23. | 29th March 2024 |
| B48. (NC REC 7) Our ONMP will be updated. Reducing noise at its source (better machines and technology) is a better environmental solution than a low boundary noise wall. We begun evening monitoring and reporting from Oct 23 with RCA. We have done continuous recording of noise levels using onsite online monitor for some time and we can review that historical data in Evening Period and report same. | Update ONMP and submit to Planning by due date. Review online evening results and report same. | 30th June 2024 |
| C4. We believe we are complying. In mid-2020 we:  track rolled groundsel weeds  Installed a track so a rig could access the required position for ground water wells at east side, middle of site and west of site. This was required to gain SSD approval. Also, further test pits (approximately 10 pits) were dug in the west part of expansion site to develop a RAP which was required before SSD approval.  Bulk earthworks and site clearing began on or about 4.11.2020. | No action required | n/a |
| C7. We believe we are complying with our OEMP and this condition. | Our OEMP is being reviewed by WSP Consultants and this review will be completed by due date opposite, after reviewing and updating as required all our Management Plans which allow for our Mod and Audit improvements. | 30th June 2024 |

**Appendix 2 – Mitigation Measures**

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| **Noise Wall 1**  The proposed 3.5m bund was found to be redundant with reducing noise. Our proposed consent modification will delete the “3.5m bond wall”. | Submit modified consent to Planning by due date | 29th March 2024 |
| **Noise Wall 2**  Proposed consent modification deletes this measure. | Submit modified consent to Planning | 29th March 2024 |
| **Noise Wall 3**  As above. Our proposed consent modification will see the deletion of the 3m wall along the southern boundary | Submit modified consent to Planning | 29th March 2024 |
| **A23 ( IMP REC 1 )**  **Erosion Control Inspections**  Myself, and a Concrush supervisor carried out regular site inspections (but not daily inspections) of stormwater lines and erosion control measures which were recorded by mobile phone camera and saved in Hold Point Record Number 5 Erosion Control Measures (Road Entry) and HP Number 4 Erosion Control Measures (Expansion Works). We believe we essentially complied as we assessed no “high risk” measures requiring daily inspections. Major site construction activities are complete. | Obtain OC.  No action required | 29 th March 2024  n/a |
| **Ground Water Testing**  We believe ground water monitoring has been sufficient and regular enough to give a thorough understanding of any possible issues and thus we essentially comply. | Update our Ground Water Management Plan by due date if required after a consultant review of our Plan | 30th June 2024 |
| **(NC REC 8) Onsite Water Storage**  We have improved this part of our recording requirements of onsite water storage and we are looking at automating some of this requirement if the existing technology is feasible. Our monthly records and inspections have been updated into a monthly spread sheet as recommended. | Check inspection and record keeping in this area have improved as recommended and implemented from Oct 2023. | 30th June 2024 |

We are committed to complete the following Improvement Recommendations of the Audit well before the 30/6/2024:

IMP REC 1, 5, 6, 8, 9, 10, 11, 12 and 13.

We are also, committed to complete the following Improvement Recommendations of the Audit well before the 30/6/2024, if after our expert Consultant has reviewed the recommendation in the context of our existing Management Plans and recommends the Auditors proposed Improvement:

IMP REC 2(waste), 3 ( grammar ), 4 ( GMP ) and 7 ( goals/dust).