

Annual Review 2019



Site: 14 Rayben Street, Glendenning

Date: 10 January 2020



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1. Overview

This Annual Review has been prepared for the Department of Planning and Environment ('the Department') as required by condition C11 of Development Consent SSD 6767 ('the Consent') for our liquid waste facility located at 14 Rayben Street, Glendenning ('the Site').

2. Development

2.1 Previous Year

Operations

The Site has continued operation of the organics plant in 2019 which involved:

- Storing and treating liquid grease trap waste (K110 type waste) as defined in the Protection of the Environment Operations Act 1997 (POEO Act); and
- Storing liquid food waste (K120 type waste) as defined in the POEO Act for aggregation and transport for beneficial reuse in the cultivation of feed crops on farms in the Sydney region.

The Site has continued operation of the hydrocarbon plant in 2019 which involved:

- Storing used oil (J100 type waste) – including mineral oils unfit for their original intended use, oil filters, transformer fluids (excluding PCB's), waste hydrocarbons for resource recovery, aggregation and transport to re-refining and other facilities for treatment and reuse; and
- Storing industrial oily water (J120 type waste – waste oil / hydrocarbons mixtures / emulsions in water) that has separated from the stored used oil. This resulting waste was then transported to other local treatment facilities.

On 9 July 2019, the Consent was amended to increase the processing capacity of used oil/industrial oily water (J100 and J120) from 10,000 tonnes per calendar year to 20,000 tonnes per calendar year.

2.2 Current Year

The Site will continue the storing and/or treatment of K110, K120, J100 and J120 in 2020.

Each year JJ Richards strive to increase the performance of the Site to provide NSW within an operation which is beneficial for the environment. This year we forecast that the acceptance of both organics and hydrocarbons will increase from the previous year, however, at all times, remain in compliance with condition A6 of the Consent.

Operations Forecast

The below table identifies the amount of waste which was received at the Site in 2019 and our forecasted receipt in 2020. We consider that changes to the Consent may be required later in the year to ensure the Site can meet the demand of the NSW waste industry through the receipt and processing of used oil/industrial oily water (J100 and J120).

Material	Approved Annual Limit (Condition A6)	2019 (Actual)	2020 (Forecast)
Liquid organic waste (K110 and K120 waste codes)	42,000 T	18,405,411 L	19,000,000 L
Used oil / industrial oily water (J100 and J120 waste codes)	20,000 T	18,776,820 L	21,000,000 L

3. Water Treatment and Non-Potable Water Use

Water Treatment

The Site commenced grease trap receipt and treatment in May 2018. The treatment results in the separation of the sludge and water wherein the water is discharged to sewer as authorised by Trade Waste Consent No. 39115 issued by Sydney Water ('the Trade Waste Consent'). Samples of the water are taken by a representative of Sydney Water and analysed to ensure compliance with the Trade Waste Consent. In addition,

relationship management meetings are held between Sydney Water and JJ Richards to discuss the Site's compliance with Sydney Water requirements. Sydney Water are satisfied that the Site has been operating in compliance with the Trade Waste Consent.

J.J. Richards record the daily water discharge amounts through our inventory and estimate a total water discharge of 18,405,441 litres in 2019 in comparison to 12,452,732 litres in 2018. The increase in water discharged is directly related to the increase in grease trap waste received at the site.

Non-Potable Water Use

A rainwater collection system is in place at the Site. The water is used in the plant for washdown purposes.

2. Monitoring Results

The Consent includes conditions relating to continual meteorological, waste and noise monitoring.

2.1 Waste Monitoring

J.J. Richards implemented a Waste Monitoring Program at the commencement of the Site operations in accordance with condition B2 of the Consent to monitor the following:

- Quantity, type and source of the waste received on site; and
- Quantity, type and quality of the outputs produced on site.

The Waste Monitoring Program utilises the below records to monitor the abovementioned requirements:

- *FRM-NSW-ACT-116 Daily Waste Oil Receival Form (Attachment 1);*
- *FRM-NSW-ACT-112 Daily Oily Water Receival Form (Attachment 2);*
- *FRM-NSW-ACT-113 Daily Organic Waste Receival Form (Attachment 3);*
- *FRM-NSW-ACT-114 Treated Grease Trap Sludge Dispatch Form (Attachment 4);* and
- *FRM-NSW-ACT-115 Waste Oil Dispatch Form (Attachment 5).*

The forms have been reviewed and amended following the 2019 annual review to reflect the operations and ensure appropriate information is captured and recorded. As required by condition 12 of the Consent, JJR notified the Department of the amendments made to the Operational Environmental Management Plan (OEMP) to include the updated forms.

In addition to the paper forms, an electronic inventory is maintained to record the amounts of organics and hydrocarbons on site at any one time and to ensure the annual receival limit is complied with. The records have identified that an increase in annual receival limits may be required to meet the operational demands.

2.2 Meteorological Monitoring

The Site has a meteorological station that complies with the requirements in the latest version of the Approved Methods for Sampling of Air Pollutants in New South Wales.

The meteorological station recorded information throughout 2019.

EIS

All possible sources of unacceptable air and odour emissions from activities on the Site that were identified as potential impacts in the EIS have been appropriately mitigated and as such have not been identified as issues during any monitoring.

2.3 Noise Monitoring

Noise monitoring will be conducted in response to valid complaints or at the request of the Secretary.

The Site did not receive any complaints and/or requests from the Department, as such; noise monitoring was not conducted in 2019.

Previous Years

The Site did not receive any complaints and/or requests from the Department, as such; noise monitoring was not conducted in 2018.

EIS

The EIS identifies potential noise impacts from the Site, however as the Site has not received and/or been provided notification of any noise complaints, we consider that the mitigation measures implemented have been successful.

2.4 Odour Monitoring

The expressed air within the organics plant passes through an activated carbon filter prior to discharge to the atmosphere. In order to ensure that the carbon filter is effective at all times, site personnel conduct odour monitoring and replacement activated carbon is stored on site in the event the filter requires replacement.

The activated carbon has not required replacement since the commencement of operations in May 2018 as odours have not been detected during the odour monitoring or by external parties.

Previous Years

The activated carbon did not require replacement in 2018.

EIS

All possible sources of unacceptable air and odour emissions from activities on the Site that were identified as potential impacts in the EIS have been appropriately mitigated and as such have not been identified as issues during monitoring.

3. Complaints

The Site did not receive any complaints within previous year. This identifies that the Site is operating effectively and control measures in place to mitigate any noise and/or odour are adequate. The Site will continue to closely monitoring results to ensure continued compliance.

4. Compliance

JJ Richards have complied with the conditions of the Consent in 2019.

5. Trends in Monitoring Data

We have not identified any trends in the monitoring data.

6. Predicted and Actual Impacts

No discrepancies have been identified between the predicated and actual impacts of the Development.

7. Environmental Performance

The Site has not received any complaints from the community and/or regulatory body and has not identified any issues relating to environmental performance. As such, the Site will continue to follow the current internal procedures to ensure meteorological and odour monitoring is conducted. Where the monitoring identifies any issues, the Site in association with HSEQ will conduct an immediate review.



Attachment 1 - FRM-NSW-ACT-116 Daily Waste Oil Receiving Form



Section 1 Waste Acceptance Criteria	The site is approved to accept the following wastes: <ul style="list-style-type: none"> ▪ Waste Mineral Oils (J100); ▪ Oil/ hydrocarbons mixtures/ emulsions in water (J120); ▪ Grease Trap Waste (K110); and ▪ Liquid Food Waste (K120). If the waste presented is outside this criteria cease unloading the vehicle and immediately notify the Site Manager and await further instruction.
Section 2 Non-Compliant Load	In the event of the Site Manager becomes aware of prohibited waste being present in any waste consignment and that is not in accordance with the Site's waste acceptance criteria: <ul style="list-style-type: none"> ▪ Cease the receiving of such waste; ▪ Remove the prohibited waste and store in a proper and efficient manner; ▪ Notify the person who sent the prohibited waste to the facility of the detection of prohibited waste in the waste received; ▪ As soon as practicable arrange for a person who can lawfully transport such waste to collect such waste; and ▪ Arrange for the person transporting the prohibited waste to transport such waste to a facility that can lawfully accept such waste. Further instructions in SWI-NSW-ACT-118 Non-Compliant Load (Isolation and Management).
Section 3 PCB Risk Assessment	<ul style="list-style-type: none"> • For all Waste Oil deliveries, prior to unloading, the operator must ask the driver of the waste transport vehicle the following questions: <ul style="list-style-type: none"> - Is there any Transformer oil in this load? - Was any oil picked up from a transformer workshop? - Was any oil picked up from a demolition site where an electrical sub-station or transformer was on site? • If the operator has asked the driver all of the questions above, the operator must write 'Y' or 'Yes' under the 'Have you asked all questions in section 3? (Y/N)' section on the form. • If the driver says No to all of the above questions, the operator should write 'N' or 'No' under the 'Were any answers to the questions in section 3 Yes? (Y/N)' section of the form. • If the driver says Yes to any of the questions above, the operator should write 'Y' or 'Yes' under the 'Were any answers to the questions in section 3 Yes?' section on the form and immediately inform their supervisor for further instruction.
Section 4 Sampling and Testing of the Load	<ul style="list-style-type: none"> • A sample of the load is to be drawn from the load. This sample is to be analysed for flashpoint. • If testing shows the load is not flammable the operator is to put an 'N' or 'No' in the FP (Y/N) section. • If testing shows the load is flammable, the operator is to put a 'Y' or 'Yes' in the FP (Y/N) section and inform their supervisor for further instruction.
Section 5 De Water Tanker and Determine Volume	<ul style="list-style-type: none"> • The oil tanker is to then be de-watered, one compartment at a time. The vehicle driver should ensure ventilation while the operator is to determine when a compartment has been sufficiently dewatered and then change compartments. • Once the de-watering operation is complete, the driver is to dip the tanker to determine the volume remaining in the load. • This volume is to be recorded in the Oil Volume section of the form. The difference between the Oil Volume and the volume total load volume is to be recorded in the Water Volume section.

Section 6 Load Details	<ul style="list-style-type: none">• The operator is to enter the following details for each load into the form:<ul style="list-style-type: none">○ Transporter Company – JJR or third party waste transporters;○ Vehicle Rego – Registration number of the vehicle used to transport the waste to the site;○ Driver Name – The name of the driver in control of the vehicle delivering the waste to the site;○ Oil Volume – The volume of waste oil within the load;○ Water Volume – The volume of water within the load;○ FP – Whether flash point of the load is >60° C after conducting a test;○ PCB Risk – Have you asked all questions in section 3? (Y/N)○ PCB Risk - Were any answers to the questions in section 3 Yes? (if so, immediately stop and advise relevant supervisor/manager)○ Tank No. – The identification number of the receival tank;○ Operator Initial – Confirmation by the operator that the information provided on the form is true and correct.
Section 7 Acknowledgment Signatures	<ul style="list-style-type: none">• Once all sections are complete the operator is to sign/initial the form to indicate that the information entered is true and correct.• At the completion of all the steps above, the unloading operation can begin.• The responsible site manager must review and sign off on the daily record.

Attachment 2 - FRM-NSW-ACT-112 Daily Oily Water Receiving Form



Date: _____

Transporter Company Name	Transporter Company Address	Transporter EPA Licence No.	Vehicle Rego	Driver Name	Volume (L)	FP (Y/N)	PCB Risk (Y/N)	Tank No.	Operator Initial
TOTAL									

Manager Name: _____

Signature: _____

Waste Acceptance Criteria	<p>The site is approved to accept the following wastes:</p> <ul style="list-style-type: none"> ▪ Waste Mineral Oils (J100); ▪ Oil/ hydrocarbons mixtures/emulsions in water (J120); ▪ Grease Trap Waste (K110); and ▪ Liquid Food Waste (K120). <p>If the waste presented is outside this criteria cease unloading the vehicle and immediately notify the Site Manager and await further instruction.</p> <p>Review Parts A and B of the WTC provided by the waste transporter to confirm that the material is as described and meets the abovementioned acceptance criteria.</p>
Non-Compliant Load	<p>In the event of the Site Manager becomes aware of prohibited waste being present in any waste consignment and that is not in accordance with the Site's waste acceptance criteria:</p> <ul style="list-style-type: none"> ▪ Cease the receiving of such waste; ▪ Remove the prohibited waste and store in a proper and efficient manner; ▪ Notify the person who sent the prohibited waste to the facility of the detection of prohibited waste in the waste received; ▪ As soon as practicable arrange for a person who can lawfully transport such waste to collect such waste; and ▪ Arrange for the person transporting the prohibited waste to transport such waste to a facility that can lawfully accept such waste. <p>Further instructions in SWI-NSW-ACT-118 Non-Compliant Load (Isolation and Management).</p>
PCB Risk Assessment	<ul style="list-style-type: none"> • For all Waste Oil deliveries, the operator should ask the driver the following questions: <ul style="list-style-type: none"> ▪ Is there any Transformer oil in this load? ▪ Was any oil picked up from a transformer workshop? ▪ Was any oil picked up from a demolition site where an electrical sub-station or transformer was on site? • If the driver says no to all of the questions above, the operator should write 'N' or 'No' under PBC Risk (Y/N) section on the DLWR form. • If the driver says yes to any of the above questions, the operator should write 'Y' or 'Yes' under the PCB Risk (Y/N) section and inform their supervisor for further instruction.
De Water Tanker and Determine Volume	<ul style="list-style-type: none"> • The oil tanker is to then be de-watered, one compartment at a time. The vehicle driver should ensure ventilation while the operator is to determine when a compartment has been sufficiently dewatered and then change compartments. • Once the de-watering operation is complete, the driver is to dip the tanker to determine the volume remaining in the load. • This volume is to be recorded in the volume section of the form.
Sampling and Testing of the Load	<ul style="list-style-type: none"> • A sample of the load is to be drawn from the load. This sample is to be analysed for flashpoint. • If testing shows the load is not flammable the operator is to put an 'N' or 'No' in the FP (Y/N) section. • If testing shows the load is flammable, the operator is to put a 'Y' or 'Yes' in the FP (Y/N) section and inform their supervisor for further instruction.
Load Details	<p>The operator is to enter the relevant details into the form:</p> <ul style="list-style-type: none"> ▪ Transporter – JJR or the name of the third party waste transport company; ▪ Vehicle Rego – Registration number of the vehicle used to transport the waste to the site; ▪ Volume – The volume of waste oil within the load; ▪ FP – Whether flash point of the load is >60o C after conducting a test;

	<ul style="list-style-type: none">▪ PCB Risk – Whether the load presents a PCB risk.▪ Tank No. – The identification number of the reveal tank;▪ Running Volume – The cumulative volume of waste oil received at the site on the designated date;▪ Operator Initial – Confirmation by the operator that the information provided on the form is true and correct.
Acknowledgment Signatures	<ul style="list-style-type: none">• Once all sections are complete the operator is to sign/initial the form to indicate that the information entered is true and correct.• At the completion of all the steps above, the unloading operation can begin.• The responsible site manager must review and sign off the form.

Attachment 3 - FRM-NSW-ACT-113 Daily Organic Waste Receiving Form



Date: _____

Transporter Company	Transporter EPA Licence No.	Vehicle Fleet No.	Volume (L)	Waste Type (Grease Trap/Pulpmaster)	No. of Sites Collected	Tank No.	Operator Initial
TOTAL							

Manager Name: _____

Signature: _____

Waste Acceptance Criteria	<p>The site is approved to accept the following wastes:</p> <ul style="list-style-type: none"> ▪ Waste Mineral Oils (J100); ▪ Oil/ hydrocarbons mixtures/emulsions in water (J120); ▪ Grease Trap Waste (K110); and ▪ Liquid Food Waste (K120). <p>If the waste presented is outside this criteria cease unloading the vehicle and immediately notify the Site Manager and await further instruction.</p>
Non-Compliant Load	<p>In the event of the Site Manager becomes aware of prohibited waste being present in any waste consignment and that is not in accordance with the Site's waste acceptance criteria:</p> <ul style="list-style-type: none"> ▪ Cease the receiving of such waste; ▪ Remove the prohibited waste and store in a proper and efficient manner; ▪ Notify the person who sent the prohibited waste to the facility of the detection of prohibited waste in the waste received; ▪ As soon as practicable arrange for a person who can lawfully transport such waste to collect such waste; and ▪ Arrange for the person transporting the prohibited waste to transport such waste to a facility that can lawfully accept such waste. <p>Further instructions in SWI-NSW-ACT-118 Non-Compliant Load (Isolation and Management).</p>
Odorous Load	<p>If an odorous load is received, work procedures will be in place to minimise any potential impact as follows:</p> <ul style="list-style-type: none"> ▪ shutting any open doors; ▪ dousing the load with an odour neutraliser; ▪ identify the waste source and investigating. <p>If required, all future loads from this source would be either pre-treated (at the source) or diverted to another lawful waste facility.</p>
Load Details	<p>The operator is to enter the following load details into the form:</p> <ul style="list-style-type: none"> ▪ Transporter Name – JJR or the name of the third party waste transport company; ▪ Transporter EPA Licence No. - The EPA Licence number held by the waste transport company. ▪ Vehicle Rego – Registration number of the vehicle used to transport the waste to the site; ▪ Volume – The volume of waste oil within the load; ▪ Waste Type – The organic waste received i.e. grease trap or liquid food waste; ▪ No. of Sites Collected – The number of sites where the waste has been collected from; and ▪ Tank No. – The identification number of the receival tank; ▪ Operator Initial – Confirmation by the operator that the information provided on the form is true and correct.
Acknowledgment Signatures	<ul style="list-style-type: none"> ▪ Once all sections are complete the operator is to sign/initial the form to indicate that the information entered is true and correct. ▪ At the completion of all the steps above, the unloading operation can begin. ▪ The responsible Site Manager must review and sign off on the daily record.

Attachment 4 - FRM-NSW-ACT-114 Treated Grease Trap Sludge Dispatch Form



Date: _____

Transporter Company	Transporter Address	Transporter EPA Licence No. (if applicable)	Vehicle Rego(s)	Volume (L)	Batch Tank No.	SESL Test Results Obtained (including Reference No.)	Receiving Facility	Operator Initial

Manager Name: _____

Signature: _____

SESL Test Results	Treated Grease Trap Waste must not be dispatched from the Site until a report from SESL has been received for the applicable which indicates that the material complies with the Treated Grease Trap Waste Order 2014 and is suitable for land application. If this report is not received do not load the vehicle and contact the Site Manager for further instruction.
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Load Details	The operator is to enter the following load details into the form: <ul style="list-style-type: none"> ▪ Transporter Name– JJR or the name of the third party waste transport company; ▪ Transporter Address – The address of the waste transport company; ▪ Transporter EPA Licence No. - The EPA Licence number held by the waste transport company (if applicable). ▪ Vehicle Rego(s) – Registration number(s) of the vehicle used to transport the waste to the site; ▪ Volume – The volume of treated grease trap waste within the load; ▪ Tank No. – The identification number of the dispatch tank; ▪ SESL Test Results Obtained – Confirmation that the results from SESL been received and the applicable reference number. ▪ Receiving Facility – The name and location of the facility where the waste is being dispatched. ▪ Operator Initial – Confirmation by the operator that the information provided on the form is true and correct.
↓	
Acknowledgment Signatures	<ul style="list-style-type: none"> • Once all sections are complete the operator is to sign/initial the form to indicate that the information entered is true and correct. • At the completion of all the steps above, the unloading operation can begin. • The responsible Site Manager must review and sign off on the daily record.

Attachment 6 - FRM-NSW-ACT-118 Site Odour Checklist



Attachment 7 – Submission of 2018 Annual Review

