



04 th June 2012

Manager – Industry Mining & Industry Projects
Department of Planning
Western Gallery
23-33 Bridge Street
SYDNEY NSW 2000
GPO Box 39 Sydney NSW 2001

Attention: Mr. Chris Ritchie

Dear Chris

**BLUESCOPE STEEL (AIS) PTY LTD – INDEPENDENT ENVIRONMENTAL AUDIT REPORT
SINTER PLANT (OPUP) ORE PREPARATIONS UPGRADE PROJECT - DEVELOPMENT
APPROVAL NO. 06_0229.**

We enclose a copy of annual independent audit report and corrective action log for the Sinter Plant Ore Preparations Upgrade Project in accordance with condition 4.1 c) of the Sinter Plant (OPUP) Ore Preparations Upgrade Project - Development Approval - DA No 06_0229.

Condition 4.1 of the Approval requires that *"The Proponent shall develop and implement a compliance tracking program to track compliance with the requirements of this approval. The program shall include, but not necessarily be limited to:*

- a) provisions for periodic review of the compliance status of the project against the requirements of this approval;*
- b) provisions for periodic review of the compliance status to the Director General;*
- c) a program for independent environmental auditing at least annually, or as otherwise agreed by the Director General, in accordance with ISO 19011;2002 – Guidelines for Quality and / Environmental Management Systems Auditing; and*
- d) mechanisms for rectifying any non-compliance identified during environmental auditing or review of compliance".*

Please be advised that Mr. R. Mason senior associate with "Molino Stewart Environment and Natural Hazards" who was deemed as appropriately qualified to undertake independent auditing for BlueScope Steel by the Department of Planning in 2012, conducted this independent environmental audit.

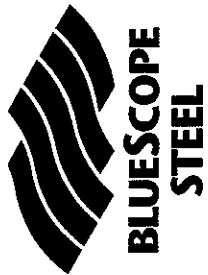
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Should you have any questions in relation to the Annual Environmental Management Report, please contact Mr. Lawrence Zammit on (02) 4275 5998.

Yours faithfully

A handwritten signature in black ink, appearing to read 'DBN', written over a circular stamp or mark.

Dave Bell
MANAGER IRONMAKING




**BLUESCOPE STEEL ORE PREPARATION UPGRADE
PROJECT CORRECTIVE ACTION LOG**

Corrective Action No.	Action Item Description	Action taken	By Whom	By When	Date Closed	Signature
1	The procedure page (containing complaints handling procedure) was incredibly slow when downloading suggests environmental staff create links to key documents from share point.	The complaints handling procedure can now be accessed via a URL link that has been included into the Ironmaking website. (*Please see Attachment 1 for details).	L.Barrett	29/05/12	29/05/12	
2	Follow up the status of the letter sent previously. Request a response for formal recognition by the department that the existing reporting periods are adequate to close out this condition.	Letter sent to DoP in 2011. Awaiting response from DoP.	L.Zammit	30/12/12		
3	Investigate the possibility of undertaking a review and consolidation of OPUP (DA 06-0229) Wast Gas Cleaning Plant (DA 260201) and Gypsum Plant (MOD5042005-i) development approvals, independent auditing and existing EPL requirements in order to stream line the compliance tracking process and obtain approval from the DOPI and EPA.	Review Waste Gas Cleaning, Gypsum plant and OPUP Ore Preparation Upgrade Project DA & EPA licence requirements. Organise a meeting with DoP to consolidate and align DA Independent auditing, reporting and EPA Licence requirements for these projects.	M.Imber R.Lorenc L.Barrett L.Zammit	30/09/12		



BLUESCOPE STEEL ORE PREPARATION UPGRADE

PROJECT CORRECTIVE ACTION LOG

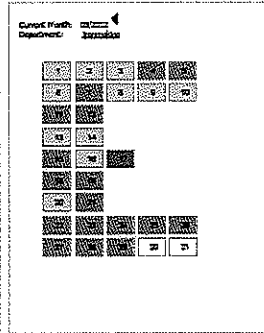
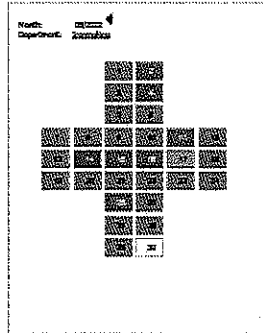
8	<p>Create a guidance note for new or existing staff on the control and storage of environmental information and documentation. In addition the hard copy of environmental information and documentation should be updated.</p>	<p>For any significant change in BSL, Ore Preparation personnel including new starters or transfers between departments, the system used is "Management of Change" in "EVENT". All BSL documents are stored in cabinets in Documentum. These can be accessed via the Ironmaking Sharepoint site.</p>	L Barrett	29/5/2012	29/5/2012	
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ATTACHMENT 1

Ironmaking

STANDARDS PEOPLE & TEAMS SKILL & LEV PERFORMANCE PROJECTS SERVICES TRAINING OPERATIONS

Ironmaking



ISRS SAFETY SYSTEM LINKS



MARS Production



MARS Reports (COGNOS)

Frequently Used Forms

ISAP Access Variation Form v2.0

Cash Expenses Claim Form

HR Forms (Full Index)

Vehicle Permit Forms

Common Links

IUP 2011

2012

Australian Standards - SAI Global

BSL Vacancies

Bulletin Board - PKSW Classifies

Divisional Handbook

Incident Reporting Matrix

Iron Age

Iron Age - Previous Issues

Ironmaking Code of Practice Compliance

Pay Point

People & Performance

Phone Directory

Reporting Environment Incidents

SERCO

SSD System

Superannuation

Frequently Used Apps

ISAP Portal

Antares Event

Cognos 8

Concur

Documentum

NSDS - Online

FSync

SharePoint

Transact

Transact - How to check status of Work Orders



Lean 5S



Ironmaking Handbook



Ironmaking Operations



Cost Saving Initiatives



Ironmaking Stewardship Model

SHARE PRICE

BSL - AU\$ 0.345



MOLINO STEWART

ENVIRONMENT & NATURAL HAZARDS



**BLUESCOPE
STEEL**

**Independent Environmental
Audit Report**

*Sinter Ore Preparation Upgrade
Project*



Independent Environmental Audit Report

SINTER ORE PREPARATION UPGRADE PROJECT

for

BlueScope Steel

by

Molino Stewart Pty Ltd

ACN 067 774 332

MAY 2012

DOCUMENT CONTROL

Document Reference	Document 4
Project	Project Name
Document Type	Report Type
Author	Richard Mason

REVISION HISTORY

Date	Version	Name	Comments
28 May 2012	V.1.2	Richard Mason	First draft for review

DOCUMENT APPROVAL

For Molino Stewart	
Name	Steven Molino
Position	Principal
For Client Name	Blue Scope Steel
Name	Lorrie Zammit
Position	Senior Environmental Advisor - Ironmaking & Major Projects

CONTENTS

1	AUDIT SCOPE AND SUMMARY	4
2	CONSTRUCTION PHASE DEVELOPMENT CONSENT CONDITIONS	5
3	TERMS OF REFERENCE	6
4	LIMITATIONS	7
5	AUDIT FINDINGS	8
6	CORRECTIVE ACTION LIST	27

1 AUDIT SCOPE AND SUMMARY

An annual independent environmental compliance audit of the BlueScope Steel Ltd. Ore Preparation Upgrade Project (OPUP) was undertaken by Molino Stewart on the 11th of April 2012 as required by condition 4.1 of Development Consent DA No 06-0229 (issued on 3 Jul 07).

The audit reviewed the projects' performance via systems, records, procedures and site observations in relation to the conditions of the original development consent associated with the Sinter Plant upgrade project. In general, the site was found to have been compliant with all relevant development consent requirements. There were no new non-compliances identified for the period since June 2010. It is noted that the three non-compliances identified in the previous audit report are yet to be formally closed out with the Department of Planning and/or the EPA (Previously DECCW). These non-compliances will be retained in future audit reports until such time as the requirements have been satisfied.

The audit was conducted in accordance with the audit objectives/terms of reference established during the audit briefing meeting.

This audit identified a total of 8 corrective actions. No non-conformances were raised during for the audit.

During the audit the following observations were made:

- The project environmental team were aware of many of the issues raised in this audit and has been proactive in updating and improving measures to address the conditions of approval, environmental management systems and environmental site management.
- The environmental team exhibited a good knowledge of the environmental management system and implementing site controls.
- There is good internal interface between the environmental team and other functional community, safety, design and construction groups.
- There is good interface between the environmental team and Sinter Plant staff.
- There is strong management support for managing site environmental issues.
- There is a well-developed and efficient data management system.

The audit found strong environmental commitment by the environmental team and senior management. BlueScope Steel is proactively instilling environmental best practices throughout the project and there are demonstrable and effective interfaces between the environmental team, other project groups and management and the Environment team.

At the completion of the audit, an exit meeting was held with relevant staff attendance. The meeting consisted of informal discussions on the corrective actions that had been noted during the audit which will form the basis of the Corrective Action List.

2 CONSTRUCTION PHASE DEVELOPMENT CONSENT CONDITIONS

The construction phase of the Ore Preparation Upgrade Project has been completed.

The list of development consent conditions below have been verified for the construction phase of the project. Because the construction phase of the project has been completed, they will not require future verification (they do not apply to the operational phase of the project):-

- 2.7 & 2.8
- 2.9 partial
- 2.10, 2.11 & 2.13
- 3.1 partial
- 3.2, 3.3 & 3.4
- 5.1 & 5.2
- 6.1 & 6.3

The development consent conditions listed above are to remain listed in future audit reports for reference but will be identified by having **DEV COMPLETE** listed.

Operational Phase Development Consent Conditions

The list of development consent conditions below applies to the operational phase of the project:-

- 2.1 - 2.6
- 2.9 partial
- 2.12
- 2.14 & 2.15
- 3.1 partial
- 4.1
- 5.3 & 5.4
- 6.2
- 7.1, 7.2 & 7.3

The development consent conditions listed above are to be verified in future audits.

3 TERMS OF REFERENCE

Molino Stewart was commissioned by BlueScope Steel to complete an independent environmental audit of the Ore Preparation Upgrade Project. Molino Stewart was informed that the Independent Environment Audit must:

- A. Be conducted by a suitably qualified, experienced, and independent person who appointment has been endorsed by the Director-General;
- B. Be consisted with ISO14010 – Guidelines and General Principles for Environmental Auditing, and ISO14011 – Procedures for Environmental Auditing or updated versions of these guidelines/manuals;
- C. Assess the environmental performance of the development, and its effects on the surrounding environment
- D. Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements
- E. Review the adequacy of the Applicant's Environmental Management Plan, and Environmental Monitoring program; and, if necessary
- F. Recommended measures or actions to actions to improve the environmental performance of the plant, and/or the environment management and monitoring systems.
- G. The compliance audit program based on the requirements of the standard operating procedures should be implemented to give assurance of operational integrity of operations

Within 2 months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General. After reviewing the report, the Director-General may require the applicant to address certain matters identified in the report. The Applicant must comply with any reasonable requirements of the Director-General.'

The audit was conducted on the 11th of April 2012 to comply with the terms of reference stated above

The audit was based on:

- * examination of a sample of administrative, technical and operating records available
- * walk around the plant and surrounding areas
- * interviews and discussions with key personnel - predominantly Lorrie Zammit (Site Environment Advisor)

4 LIMITATIONS

The process by which this audit was conducted, including the sample of records selected and the method for examination used, followed established audit protocols and was in accordance with the best professional judgment of the auditor. It should be understood that the audit consisted of sample observations in a short span of time. Efforts were directed toward sampling all applicable facets of the EMS and associated records, but it is important to recognise that such a sampling method can only support general conclusions and does not necessarily identify all potential problems.

5 AUDIT FINDINGS

The audit findings were graded in accordance with the following classifications:-

- * **Compliant**: demonstrated compliance with, or the failure to implement and maintain the requirements of, a development consent condition.
- * **Non-Compliance**: The absence of evidence to demonstrate compliance with, or the failure to implement and maintain the requirements of, a development consent condition.
- * **Corrective action**: A finding indicative of a weakness that is not a non-compliance that would benefit from improvement through a corrective action.
- * **Opportunity of improvement**: An item of evidence found during an audit. Observations may or may not require corrective action
- * **Complete**: the condition of approval has been completed or addressed

The audit was conducted in accordance with the audit objectives/terms of reference established during the audit briefing meeting.

This audit identified a total of 8 corrective actions. No non-conformances were raised during for the audit. The project environmental team were aware of many of the issues raised in this audit and has been proactive in updating and improving measures to address the conditions of approval, environmental management systems and environmental site management.

- * The environmental team exhibited a good knowledge of the environmental management system and implementing site controls.
- * There is good internal interface between the environmental team and other functional community, safety, design and construction groups.
- * There is good interface between the environmental team and Sinter Plant staff.
- * There is strong management support for managing site environmental issues.
- * There is a well-developed and efficient data management system.

The audit found strong environmental commitment by the environmental team and senior management. BlueScope Steel is proactively instilling environmental best practices throughout the project and there are demonstrable and effective interfaces between the environmental team, other project groups and management and the Environment team.

The following table summarises the audit findings.

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
1 ADMINISTRATIVE CONTROLS				
1.5	Production Capacity	The maximum production capacity from the upgraded Sinter Plant shall be limited to 6.6 million tonnes per annum.	Production capacity Rates (2011/12) were provided on request- daily production is tracked via a daily report which was provided. Report emailed to R Mason. Alan Bennet in the technology group is responsible for provision of reports.	Compliance Year to date production (2011/2012 FY) was calculated by the Dave Bell - Operations at 3.139 million tonnes. This equates to approx. 5.9 million tonnes on an annual basis.
2 Environmental Conditions				
Air Quality Impacts				
2.1	Odour	<p>The Proponent shall not permit any offensive odour, as defined under section 129 of the Protection of the Environment Operations Act 1997, to be emitted beyond the boundary of the site.</p> <p>Emission of odours from premises licensed for scheduled activities: 129 Emission of odours from premises licensed for scheduled activities</p> <p>(1) The occupier of any premises at which scheduled activities are carried on under the authority conferred by a licence must not cause or permit the emission of any offensive odour from the premises to which the licence applies.</p> <p>(2) It is a defence in proceedings against a person for an offence against this section if the person establishes that:</p> <p>(a) the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of the licence directed at minimising the odour, or (b) the only persons affected by the odour were persons engaged in the management or operation of the</p>	<p>No offensive odours were found to be generated from the site.</p> <p>Have any complaints regarding Odours been received? No complaints have been received in this reporting period that directly relate to the sinter plant OPUP have been received in the past year.</p> <p>Evidence of complaints handling process and register – regarding odour was provided in the audit.</p> <p>A 1800 callout number is available in the website and listed in the phone book.</p> <p>A procedure for environmental complaints handling was available on the divisional procedure intranet / environmental management manual.</p> <p>Environmental advisors were found to utilise the complaints procedure site.</p> <p>Staff receiving calls are part of the business administration switchboard, any complaints are fielded to the SEA on call they will also log the call and details when received.</p> <p>Every week the environment department reviews the status of complaints to prompt sign off. Any outstanding issues are tracked weekly (meeting</p>	<p>Compliance No offensive odours were found to be generated from the site.</p> <p>Corrective Action: The procedure page (containing complaints handling procedure) was incredibly slow when downloading suggests environmental staff create links to key documents from share point.</p>

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
		premises.	minutes provided)	
2.2	Dust Emissions	The Proponent shall design, construct, commission, operate and maintain the project in a manner that minimises or prevents the emission of dust from the site including windblown and traffic generated dust.	<p>How is Dust at/from the Sinter Plant controlled? The BSL Fugitive Dust Management System outlines the site procedures used for minimising dust emissions.</p> <p>Evidence of controls was observed during the inspection (Negative pressure etc.) Details of dust controls (upgrades) for the Sinter plant and - BSL Fugitive Dust Management System details were provided.</p> <p>Evidence of Dust Control procedures were contained in the CEMP and Environmental Management Manual for the Sinter Plants</p> <p>A copy of the procedure was provided in addition the PRP 133/134 for dust controls were given. PRP 133 of the EPL has been closed fugitive dust emission from road transport.</p> <p>Are measures in place in Stockpiling areas to control dust?</p> <p>PRP 134 in the EPL requires reduction in dust and runoff from stockpiles. Dust appears to be well managed at the site with some innovative new reduction measures (wheel wash bays) being implemented through PRP 133</p> <p>Details of any Complaints Received and Process? No dust complaints have been received in the period relating to the OPUP.</p> <p>Details of Monitoring and provision of a sample of results viewed.</p>	<p>Complaints: No dust complaints have been received in the period relating to the OPUP and procedures were found to be in place to minimise or prevent the emission of dust from the site including windblown and traffic generated dust.</p>

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
2.3	Dust Emissions	<p>The Proponent shall take all practicable measures to ensure that all vehicles entering or leaving the site, carrying a load that may generate dust, are covered at all times</p>	<p>How do vehicles entering and Leaving the site control dust? Trucks entering and Leaving the site are managed by Procedures and The BSL Fugitive Dust Management System. There are no specific requirements in the EPL for all vehicles to be covered. However the BSL Fugitive Dust Management System outlines the site procedures used for minimising dust emissions.</p> <p>Are the procedures in the EMP or Sub plans addressing Dust? Yes procedures were in place and were provided on request.</p> <p>How Subcontractors are made aware of requirements? Examples of training / induction etc. were provided upon request.</p> <p>Other evidence: Roads are swept (Veolia) and watered by water cart undertaken by contractors (south coast equipment) on every shift. A new wheel bath system has recently been implemented. There is potential in the future to install truck wash stations. No dust complaints received</p>	<p>Procedures were found to be in place ensuring that all vehicles entering or leaving the site, carrying a load that may generate dust, are covered at all times. No dust complaints have been received during the period.</p>
2.4	Dust Emissions	<p>All activities on the site shall be undertaken with the objective of preventing visible emissions of dust beyond the boundary of the site. Should such visible dust emissions occur at any time, the Proponent shall identify and implement all practicable dust mitigation measures, including cessation of relevant works, as appropriate.</p>	<p>Evidence of dust mitigation measures, procedures and stop work procedure was provided.</p> <p>The BSL Fugitive Dust Management System outlines the site procedures used for minimising dust emissions. (Evidence1) No dust complaints received to date.</p> <p>A weather alert system has been installed "at 3pm we can expect 50km/hr winds" - water carts and sweepers and manual water sprays are operated before the wind picks up.</p>	<p>BSL Fugitive Dust Management System outlines the site procedures used for minimising dust emissions. No dust complaints have been received during the period.</p>

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
			<p>99% of stockpiles have an automatic water spray system linked to air speed monitoring equipment. PRP 134. A Stockpile management plan Proforma has recently been implemented (env. risk assessment) the proforma outlines what size what material, potential for fugitive dust from this determines whether supplementary DMC need to be implemented.</p>	
Discharge Limits				
2.6	Discharge Limits	<p>The Proponent shall design, construct, operate and maintain the project to ensure that emissions from the Sinter Plant Waste Gas Cleaning Plant Exhaust Stack comply with the discharge limits specified in Table I</p>	<p>Is monitoring of Sinter Plant Waste Gas Cleaning Plant Exhaust Stack undertaken to ensure discharge limits comply with specified limits?</p> <p>Examples of Stack emission mitigation measures (licence 6092 nine months of quarterly monitoring reports provided J_S 2011 O_D 2011) were provided on request.</p> <p>Evidence of Stack emission monitoring was provided- EPA 2 Sinter Machine Room De-Dusting stack and EPA ref 107 Sinter Plant Waste Gas Cleaning Plan quarterly records and monitoring stack test results were viewed as per the EPL requirements. No breaches at Sinter Plant for the last three calendar quarters.</p> <p>Quarterly reporting and monitoring requirements are listed in the EPL (provided). All parameters are measured quarterly against limits defined in the EPL. All stack monitoring related data is sent to the EPA. Records for the Waste gas cleaning stack were observed for three quarters. The stack was monitored for all parameters required by EPL. No license breaches to have been recorded to date with the majority of parameters being well below threshold limits. Individual reports for each stack list all required sampling methods with which to conform. Air quality monitoring technicians undertake quarterly stack</p>	<p>Compliant</p>

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
			<p>testing as per EPL requirements. Data is then provided to the SEA and production manager, compliance is verified and a monthly compliance report is signed by the operations manager. If breaches were detected the Air Quality Manager would notify all relevant staff with an incident report being created to identify root cause and a non-compliance. The non-compliance would then be reported to the EPA via the BSL/EPA Quarterly report.</p> <p>Procedures for stack emission monitoring were available on the intranet and in Operations documentation.</p> <p>Monitoring Equipment? Records of calibration for monitoring devices were available.</p>	
2.7	Sinter Cooler Waste Gases	<p>Sinter Cooler Waste Gases: The Proponent shall conduct investigations into the use of spare capacity in the room de-dusting system to manage and treat additional dust loads from the Sinter Cooler. Twelve months following recommissioning, the Proponent shall provide the EPA and the Director-General with a report that:</p> <ul style="list-style-type: none"> a) identifies and reviews technically feasible and practicable options for diverting Sinter Cooler waste gases to the room de-dusting system; b) provides a cost benefit analysis to the options identified in 2.7a); c) estimates the reduction in particulate emissions from the sinter cooler and the increase in emissions from the de-dusting stack; d) estimates the increase in electrostatic precipitator dust collected from the system; and, e) if the investigations reveal feasible waste gas management options, then the Proponent must provide recommendations and an implementation program. 	<p>Submission of report These requirements have been listed in the site's Environment Protection Licence No. 6092 – Condition U12 (PRP 127). A report with a covering letter dated 29 Sep 2010 was submitted to the DECCW identifying two possible options, neither feasible. A letter from the DECCW dated 30 Nov 2010 stated that the requirements of PRP 127 had been met.</p>	<p style="text-align: center;">NEW COMPLIANCE</p>

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
2.8	Construction Noise	<p>Noise Impacts Construction Noise: The Proponent shall only undertake construction activities associated with the project that would generate an audible noise at any residential premises between the following hours:</p> <ul style="list-style-type: none"> a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive; b) 8:00 am to 1:00 pm on Saturdays; and c) at no time on Sundays or public holidays. <p>This condition does not apply in the event of a direction from police or other relevant authority for safety or emergency response. Note: 'safety or emergency reasons' refers to emergency works which may need to be undertaken to avoid loss of life, property loss and/or to prevent environmental harm.</p>	<p>No noise complaints were received during the construction activities outside of these times. These requirements have been listed in the site's Environment Protection Licence No. 6092 – Condition U12 (PRP 127). A report with a covering letter dated 29 Sep 2010 was submitted to the DECCW identifying two possible options, neither feasible. A letter from the DECCW dated 30 Nov 2010 stated that the requirements of PRP 127 had been met.</p>	<p>REVISED</p>
2.9	Operation Noise	<p>The Proponent shall design, construct, operate and maintain the project so that the project does not exceed a noise contribution at the nearest affected residence of 35 dB (A) when measured as LA (15 minute). Noise monitoring locations and methodologies to establish compliance with this condition shall meet the requirements of the EPA, as may be specified in an Environment Protection Licence applicable to the project.</p>	<p>These requirements have been listed in the site's Environment Protection Licence No. 6092 – Condition U15 (PRP 130). A letter from the DECCW dated 23 Apr 2010 stated that the requirements of PRP 130 had been met.</p> <p>The Noise Compliance Assessment Report by Hatch dated 21 July 2010 indicates the site complies with noise monitoring conditions. The frequency of noise monitoring is to occur annually (as per BlueScope Document No. 9933 'PRP 105 – SMERP Noise Monitoring of Sinter Machine Emission Reduction' dated 8 April 2004 and subsequent reply from DECCW by letter dated 16 June 2004 accepting conditions).</p> <p>Conditions of the approval translated to EPL and PRP and subsequently signed and approved by EPA.</p>	<p>REVISED</p> <p>Conditions of the approval translated to EPL and PRP.</p> <p>COMPLIANT EPL requirements</p>

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
			<p>Under the EPL (L6) there is a 70 DBA Leq 15mins requirement for the sinter plant. The monitoring location is at a site near port Kembia harbour. Routine checks are undertaken every two or three years. No breaches of noise conditions have occurred to date. A copy of the noise monitoring survey was provided on request.</p>	
2.10	Operation Noise 2.10	<p>For the purpose of assessment of noise contributions specified under condition 29 of this consent, noise from the project shall be: a) measured at the most affected point on or within the site boundary at the most sensitive receiver to determine compliance with LAeq(15 minute) night noise limits; b) measured at one metre from the dwelling façade to determine compliance with LA(d minute) noise limits; and .c) subject to the modification factors provided in Section 4 of the New South Wales Industrial Noise Policy (EPA, 2000), where applicable. Notwithstanding, should direct measurement of noise from the development be impractical, the Proponent may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 1 1 of the New South Wales Industrial Noise Policy (EPA 2000)). Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Director-General prior to the implementation of the assessment method.</p>	<p>Noise Compliance Assessment Report by HATCH dated 21 Dec 2009 outlined a Noise Compliance Assessment Procedure (NCAP) dated 9 Jan 2008 and approved by the DECCW on 26 February 2008.</p> <p>Noise surveys undertaken by Hatch in compliance with the conditions listed L6 of the EPL. A copy of the HATCH report was viewed upon request.</p>	<p>COMPLETE</p>
Surface Water Quality Impacts				
2.11	Surface Water Quality Impacts	<p>The Proponent shall install stormwater drains, stormwater ponds, settlement ponds and/or storage ponds and other erosion, sediment and pollution controls as may be appropriate to manage stormwater on the site. The Proponent shall maintain all erosion, sediment and pollution</p>	<p>There was no need identified to install any additional erosion/sediment controls to manage stormwater on site as the site's existing controls were found to be adequate.</p>	<p>COMPLETE</p>

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
		control infrastructure at or above design capacity for the duration of construction of the project and until such time as all ground disturbed by the works has been stabilised and rehabilitated so that it no longer acts as a source of sediment.		
2.12	Surface Water Quality Impacts	The Proponent shall comply with section 120 of the Protection of the Environment Operations Act 1997 which prohibits the pollution of waters	Evidence of Water pollution mitigation was provided upon request. Water quality monitoring data indicates that section 120 of POEO Act and or condition in the site's Environmental Protection Licence is compliant during the period for sinter plant operations. Copies of the last 3/4 were provided which outlined all SWQ monitoring required by the EPL for the site. No breaches were recorded.	Compliant
Waste Generation and Management				
2.13	Waste Generation and Management	The Proponent shall maximise treatment and/or beneficial reuse of waste materials associated with the development to ensure minimisation of temporary storage of waste on the site and minimisation of waste volumes requiring disposal.	The Construction Environmental Management Plan (Doc No. OPUP-MP-NAS-GEN-AP-00525 dated Jan 08) lists various construction waste streams to be reused or recycled where possible. A divisional waste management procedure was provided on request.	Not Compliant
2.14	Waste Generation and Management	The Proponent shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997, if such a licence is required in relation to that waste.	A divisional waste management procedure was provided on request. The divisional waste management procedure outlines all handling and treatment of waste for the site. An internal 3 docket system exists. Materials disposed off-site require approval before transported. This condition is included in the monthly Sinter Plant manager's compliance sign off. There was no evidence that waste generated outside was received at the site. Contractors and subcontractors were made aware of this during induction.	Compliant

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
2.15	Waste Generation and Management	The Proponent shall ensure that all liquid and or non-liquid waste generated and or stored on the site is assessed and classified in accordance with Environmental Guidelines Assessment, Classification and Management of Liquid and Non Liquid Wastes (DEC, 2004), or any future guideline that may supersede that document.	Disposal authorisations sighted confirmed appropriate Waste Guidelines were used.	Compliant
Environmental Monitoring and Auditing				
3.1	Air Quality Monitoring	To establish compliance with condition 2.6 of this Approval, the Proponent shall monitor the emissions from the Room De-dusting Stack and the Waste Gas Cleaning Plant Exhaust Stack at the monitoring points listed by the EPA in the existing Environmental Protection Licence. Monitoring shall be undertaken within 3 months following recommissioning of the Plant, and then at a frequency specified in the Environmental Protection Licence and utilising test methods agreed with the EPA.	Evidence of Stack emission monitoring was provided in quarterly reporting and monitoring requirements are listed in the EPL (provided). The stack was monitored for all parameters required by EPL. No license breaches to have been recorded to date with the majority of parameters being well below threshold limits. Air quality monitoring results of exhaust stack gas were carried out in early Dec 2009 (within 3 months of re-commissioning).	NEW COMPLETE
3.2	Air Quality Monitoring	Within 28 days of conducting the recommissioning monitoring referred to under condition 3.1 of this approval, the Proponent shall provide the Director-General and the EPA with a copy of the report. If the monitoring identifies significant deviance from the predictions made in the documents referred to under condition 1.1 or any exceedance of limits in accordance with condition 2.6, the Proponent shall detail what additional measures would be implemented to address these exceedances. The Proponent shall clearly indicate who would implement these measures, when these	The report on exhaust stack gas monitoring was submitted to the Director-General of the Department of Planning and the DECCW on 6 Jan 2010.	NEW COMPLETE

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
		measures would be implemented, and how the effectiveness of these measures would be assessed and reported to the Director-General		
3.3	Noise Monitoring	<p>The Proponent shall undertake a program to confirm the noise performance of the project as referred to in condition 2.10. The noise program shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> a) noise monitoring consistent with the guidelines provided in the New South Wales Industrial Noise Policy (EPA, 2000), to assess compliance with condition 2.9 of this Approval. b) methodologies, locations and frequencies for noise monitoring; c) identification of monitoring sites at which pre- and post-project noise levels can be ascertained; d) details of any complaints and enquiries received in relation to noise generated by the project within the first three months of operation; e) a statement of whether the site is in compliance with noise limits specified in condition 2.9; and f) any additional noise mitigation measures and timetables for implementation. <p>The noise program shall be documented in a report which shall be submitted at various times as specified in condition 3.4.</p>	<p>These requirements are listed in the site's Environment Protection Licence No. 6092 – Condition U15 (PRP 130). A letter from the DECCW dated 23 Apr 2010 stated that the requirements of PRP 130 had been met.</p>	ITEM COMPLETE
3.4	Noise Monitoring	<p>The Proponent shall provide the Director-General and the EPA with a report which includes the noise monitoring procedures and monitoring results referred to under condition 3.3 of this Approval. The report is to be provided:</p> <ul style="list-style-type: none"> a) six months prior to commencement of construction (final monitoring procedures); b) four months prior to commencement of construction (draft monitoring procedures); 	<p>These requirements are listed in the site's Environment Protection Licence No. 6092 - Condition U15 (PRP 130). A letter from the DECCW dated 23 Apr 2010 stated that the requirements of PRP 130 have been met.</p>	ITEM COMPLETE

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
Compliance Monitoring and Tracking				
4.1	Compliance tracking	<p>c) prior to commencement of construction (monitoring results); and</p> <p>d) three months after commissioning of the project (monitoring results).</p> <p>If the noise monitoring report identifies any non-compliance with the noise limits imposed under this approval (refer to condition 2.9), the Proponent shall detail what additional measures would be implemented to ensure compliance, clearly indicating who would implement these measures, when these measures would be implemented, and how the effectiveness of these measures would be measured and reported to the Director –General and EPA.</p>	<p>The Conditions of 4.1 are being complied with however there is no formal provision of the report to the Director General.</p> <p>The previous annual independent environmental audit was submitted to the Director-General on 25 Aug 2010 and in May 2011.</p> <p>Previous Non-Compliance (Raised in Jul 2010): Previously the Compliance Tracking Program did not define the provisions for periodic reporting of compliance status to the Director General (Condition b). There was no evidence that any reporting to the Director-General was conducted during the first 12 months of the project, although monthly compliance monitoring was conducted.</p> <p>Recommendations (Raised in 2011): Write to the Department of Planning and DECCW to clarify whether the submission of the annual independent compliance audit report to the Director-General is acceptable as 'periodic reporting of</p>	<p>Compliant</p> <p>The Conditions of 4.1 are being complied with however there is no formal provision of the report to the director General. Having an annual independent verification to meet this requirement. As the project has been completed, several Development approvals are complete or covered off by EPL requirements. There has been no formal recognition by the department that the existing reporting periods are adequate.</p> <p>Corrective action 2: Follow up the status of the letter sent previously. Request a response for formal recognition by the department that the existing reporting periods are adequate to close out this condition.</p>

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
		<p>The previous annual independent environmental audit was submitted to the Director-General on 25 Aug 2010.</p>	<p>compliance status'</p> <p>A letter dealing with the non-compliance identified during the previous annual independent compliance audit report has been submitted to the Department of Planning. BlueScope steel are awaiting a reply.</p> <p>A monthly compliance report was signed off by the project manager for the OPUP until November 2009. From this date forward Sign off was undertaken by the Sinter Plant Operations Manager.</p> <p>All relevant information and DA approvals were transferred to this report. Independent audits are carried out annually (Safetrain / Molino Stewart). Mechanisms for tracking and rectifying non-compliance identified are also in place as part monthly quarterly and annual reporting process in compliance with requirements of the EPL.</p>	<p>NEW COMPLETE</p> <p>Corrective Action 3: Investigate the possibility of undertaking a review and consolidation of OPUP (DA 06-0229) Waste gas cleaning plant (DA 260201) and Gypsum Plant (MOD5042005-i) development approvals, independent auditing and existing EPL requirements in order to stream line the compliance tracking process and obtain approval from the DOPI and EPA.</p>
Community Information, Consultation and Involvement				
5.1	Public inspection of documents	<p>Subject to commercial confidentiality, the Proponent shall make all documents required under this approval available for public inspection on request.</p>	<p>The Public Website is no longer accessible and current website does not contain material relevant to OPUP.</p> <p>All relevant documents of a non-commercial confidentiality nature were previously made available to the public via a dedicated website during the construction phase; however, this website is no longer accessible. A letter outlining the situation described above was sent to the DOPI on the 18 May 2011 BlueScope steel are awaiting a reply.</p> <p>Any EPL information regarding the site is publically available from the EPA.</p>	<p>NEW COMPLETE</p> <p>Corrective Action 3: A DOPI response or clarification on what information is required to be displayed publicly. The response will help define what if anything is to be provided publicly on the website as per the letter dated 18th of May 2011.</p>
5.2	Public inspection of documents	<p>Prior to the commencement of construction of the project, the Proponent shall ensure that the</p>	<p>It was reported that a phone number, postal address and email address was available at the time of the</p>	<p>NEW COMPLETE</p>

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
		<p>following are available for community complaints and enquiries for the life of the project (including construction and operation):</p> <ul style="list-style-type: none"> a) a telephone number on which complaints and enquiries about construction and operational activities at the site may be registered; b) a postal address to which written complaints and enquiries may be sent; and c) an email address to which electronic complaints and enquiries may be transmitted. <p>The telephone number, the postal address and the email address shall be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public, and which clearly indicates the purposes of the sign. This information is also to be provided on the Proponent's website.</p>	<p>construction of the project. The site has a publicly listed telephone number to capture any complaints or comments. The website provides a contact number and address details for the site.</p>	
5.3	Up-to-date Complaints and Enquiries Register	<p>The Proponent shall record details of all complaints and enquiries received through the means listed under condition 5.2 of this approval in an up-to-date Complaints and Enquiries Register. The Register shall record, but not necessarily be limited to:</p> <ul style="list-style-type: none"> a) the date and time, where relevant, of the complaint and enquiry; b) the means by which the complaint and enquiry was made (telephone, mail or email); c) any personal details of the complainant and/or enquirer that were provided, or if no details were provided, a note to that effect; d) the nature of the complaint and enquiry; e) record of observational and meteorological condition contributing to complaint; f) any action(s) taken by the Proponent in relation to the complaint and enquiry, including any follow-up contact with the complainant and/or enquirer; and g) if no action was taken by the Proponent in 	<p>A copy of the complaints and complaints procedure was provided on request. A selection of complaints from the site's Complaints Database records was provided and viewed. No complaints associated with OPUP have been received in this period.</p>	

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
		<p>relation to the compliant and enquiry, the reason(s) why no action was taken. The Complaints and Enquiries Register shall be made available for inspection by the Director-General upon request.</p> <p>Status: The site's Complaints Database records the information required. Please note that meteorological information is only listed if applicable to complaint. No complaints associated with OPUP have been received since June 2010.</p>		
5.4	<p>New website, or dedicated pages within the existing website for provision of electronic information associated with the proposal</p>	<p>The Proponent shall establish and maintain a new website, or dedicated pages within the existing website for provision of electronic information associated with the proposal. The Proponent shall publish and maintain up-to-date information on this website or dedicated pages for the life of the project and include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> a) a copy of the documents referred to under condition 1.1 of this approval, and any documentation supporting modifications to this approval that may be granted from time to time; b) a copy of this approval and each relevant environmental approval, licence or permit required and obtained in relation to the project; c) a copy of each strategy, plan and program required under this approval; and d) the outcomes of compliance tracking in accordance with condition 4.1 of this approval. 	<p>The Public Website is no longer accessible and current website does not contain material relevant to OPUP.</p> <p>All relevant documents of a non-commercial confidentiality nature were previously made available to the public via a dedicated website during the construction phase; however, this website is no longer accessible.</p> <p>Non-Compliance was Raised in Jul 2010: stating that all relevant documents apart from outcomes of monthly compliance tracking were made available to the public via a dedicated website, however, this website is no longer accessible. Further recommendations were raised in 2011):</p> <p>(a) Write to the Department of Planning and DECCW to clarify what would be acceptable instead of the dedicated website for the remaining life of the project</p> <p>(b) A letter outlining the situation described above was sent to the DOPI on the 18 May 2011 BlueScope steel are awaiting a reply.</p> <p>In addition any EPL information regarding the site is publically available from the EPA.</p>	<p>NEW/COMPLETE</p> <p>Corrective Action 3: A DOPI response or clarification on what information is required on the website. The response will help define what if anything is to be provided publically on the website as per the letter dated 18th of May 2011.</p>
<p><i>Environmental Management</i></p>				

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
6.1	Construction EMP	<p>Prior to the commencement of the construction of the project, the Proponent shall prepare and implement a Construction Environmental Management Plan to outline environmental management practices and procedures to be followed during construction of the project. The Plan shall be prepared in accordance with the Guideline for the Preparation of Environmental Management Plans (DIPNR 2004) and shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> a) a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant; b) statutory and other obligations that the Proponent is required to fulfil during construction including all approvals, consultations and agreements required from authorities and other stakeholders, and key legislations and policies; c) details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan: <ul style="list-style-type: none"> i) measures to monitor and manage dust emissions ii) measures to monitor and minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities; and iii) measures to monitor and control noise emissions during construction works. d) a description of the roles and responsibilities for all relevant employees involved in the construction of the project; e) the additional studies listed under condition 6.2 of this approval; and f) complaints and enquiries handling procedures 	<p>Construction Environment Management Plan (Doc No. OPUP-MP-NAS-GEN-AP-00525 dated Jan 08) exists. All information required contained within.</p>	<p style="text-align: center;">REMOVED</p>

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
		<p>during construction. The Plan shall be submitted for the approval of the Director-General no later than one month prior to the commencement of any construction works associated with this project, or within such period otherwise agreed by the Director-General. Construction works shall not commence until written approval has been received from the Director-General.</p>		
6.2	Construction EMP	<p>As part of the Construction Environmental Management Plan for the project required under condition 6.1 of this approval, the Proponent shall prepare and implement the following:</p> <p>a) where soil testing prior to the commencement of construction identifies the presence of acid sulphate soils, an Acid Sulphate Soil Management Plan prepared in accordance with guidance provided in Acid Sulphate Soil Manual (Acid Sulphate Soil Management Advisory Committee, 1998);</p> <p>b) a Construction Water Management Plan to detail how surface water, groundwater and stormwater will be managed on the site during construction. The Plan shall include use of appropriately-sized stormwater controls, in accordance with Managing Urban Stormwater: Soils and Construction (Landcom, 2004). The Plan shall include specific measures to avoid sediment-laden stormwater from entering Port Kembla inner Harbour, and a monitoring program for stormwater leaving the site.</p> <p>c) a Construction Noise Management Plan to detail how construction noise and vibration impacts would be minimised and managed;</p> <p>d) a Construction Traffic Management Plan to detail how heavy vehicle movements associated with the project would be managed during the</p>	<p>Non-Compliances (Raised in 2010):</p> <p>1) Condition c) iii) - There were limited lists of actions and measures that would be implemented to ensure that the works would comply with the relevant noise and vibration criteria/guidelines in the Construction Environment Management Plan (Doc No. OPUP-MP-NAS-GEN-AP-00525 dated Jan 08).</p> <p>condition c) iv) – Although there is a process for dealing with complaints that applies to the entire site, there was no procedure for notifying residents of construction activities that are likely to affect their noise and vibration amenity.</p> <p>Recommendation (Raised in 2011): A letter dealing with the non-compliance identified during the previous annual independent compliance audit report has been submitted to the Department of Planning. Waiting for reply.</p>	<p>Corrective Action: A DOPI response or clarification on what information is required.</p>

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
		<p>construction phase of the development. The Plan shall specifically address the management of construction traffic along the existing heavy vehicle routes within the Wollongong local government area, measures to minimise the impact of construction traffic along the classified road network, restrictions to the hours of heavy vehicle movements to avoid road use conflicts, movement of oversize loads to and from the site, and the transport of construction waste materials. The Traffic Management Plan must be prepared in consultation with the RTA and Council.</p>		
6.3	EMP for Operation	<p>Prior to the commencement of recommissioning of the Ore Preparation area, the Proponent shall demonstrate to the satisfaction of the Director-General that it has updated environmental and safety management systems for the Steelworks to reflect the works subject to this Approval.</p>	<p>OEMP On 30 Jul 2009, a list of the procedures that were part of the HSE Management System for the steelworks was forwarded to the Director General. Date of end of hot commissioning was 30 Sep 2009.</p> <p>EMS is regularly updated.</p>	<p>TEMPORARILY COMPLETE</p>
<i>Environmental Reporting</i>				

#	Impact/Issue	Condition Requirement	Evidence (Requests)	Status
7.1	Incident Reporting	The Proponent shall notify the Director-General of any incident with actual or potential significant off-site impacts on people of the biophysical environment as soon as practicable after the occurrence of the incident. The Proponent shall provide written details of the incident to the Director-General within several days of the date on which the incident occurred.	The Sinter Plant has not had any significant environmental incidents from the project to date. BSL follow divisional incident reporting procedures. The S&E incident reporting procedure was provided on request. With recent duty to notify requirements under the POEO act the site is also subject to this.	Corrective action: Clarification is required by the DOPI on the preferred mechanism for notification of a significant environmental incident occurring at the site to meet the requirement of the DA.
7.2	Incident Register	The Proponent shall maintain a register of accidents, incidents and potential incidents with actual or potential significant off-site impacts on people or the biophysical environment. The register will be made available for inspection at any time by the independent qualified person or team conducting the Environmental Audit and/or the Director-General.	The project utilises the Harmony Safety and environment reporting database to record all relevant details of incidents occurring on site. A new system for reporting incidents will be implemented by June 2012. The Harmony database was viewed upon request. An environmental incident record was observed which occurred on the 09/04 and involved a piece of plant being offline; a corrective action linked to the incident was also observed and tracked.	Completed
7.3	Root Cause Analysis	The Proponent shall meet the requirements of the Director-General to address the cause or impact of any incident, as it relates to this consent, reported in accordance with condition 7.1 of this consent, within such period as the Director-General may agree.	Root cause analysis is part of incidents reporting procedure and system occurring on site. Root cause analysis is only required if it is classified p4 in the system. As no significant environmental incidents had been recorded a root cause analysis was not available to review.	Completed
<p>General Observations</p> <p>During the audit it was observed that there were multiple systems for the control and storage of environmental information and documentation it is suggested that a guidance note be created for new staff as to the location of all relevant files relating to the requirements of DA's and Environmental management system. In addition the hard copy folder containing relevant environmental information requires updating.</p> <p>Corrective action: Create a guidance note for new or existing staff on the control and storage of environmental information and documentation. In addition the hard copy of environmental information and documentation should be updated.</p>				

6 CORRECTIVE ACTION LIST

Corrective Actions:	
Refer to the Corrective Action Item list attached to the end of this report for details. It is required that the Project Environmental Representative reviews the Action List and in consultation with the Project Manager, fills out the columns titled for 'Action to be Taken', 'By whom', and 'By when'.	
It is the responsibility of the Project Environmental Representative to monitor the progress of the Action List items and ensure close out.	
No. of Corrective Action Items Raised: 8	Is Action List Closed off? <input type="radio"/> Yes <input checked="" type="radio"/> No Signed (When Completed)

Item No.	Action Item Description	Action taken	By Whom	By When	Date Closed	Signature
1	The procedure page (containing complaints handling procedure) was incredibly slow when downloading suggests environmental staff create links to key documents from share point.					
2	Follow up the status of the letter sent previously. Request a response for formal recognition by the department that the existing reporting periods are adequate to close out this condition.					
3	Investigate the possibility of undertaking a review and consolidation of OPUP (DA 06-0229) Waste gas cleaning plant (DA 260201) and Gypsum Plant (MOD5042005-i) development approvals, independent auditing and existing EPL requirements in order to stream line the compliance tracking process and obtain approval from the DOPI and EPA					
4	A DOPI response or clarification on what information is required to be displayed publicly. The response will help define what if anything is to be provided publicly on the website as per the letter dated 18th of May 2011.					

Item No.	Action Item Description	Action taken	By Whom	By When	Date Closed	Signature
5	A DOP1 response or clarification on what information is required on the website. The response will help define what if anything is to be provided publically on the website as per the letter dated 18th of May 2011.					
6	A DOP1 response or clarification on what information is required					
7	Clarification is required by the DOP1 on the preferred mechanism for notification of a significant environmental incident occurring at the site top meet the requirement of the DA					
8	Create a guidance note for new or existing staff on the control and storage of environmental information and documentation. In addition the hard copy of environmental information and documentation should be updated.					

