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25 July 2013

Manager – Industry Mining & Industry Projects
Department of Planning
Western Gallery
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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 on 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.S.Molino and Ms S.Baguley from “Molino Stewart Environment & Natural Hazards” consultancy who were deemed as appropriately qualified to undertake independent auditing for BlueScope Steel by the Department of Planning in 2012, conducted this independent environmental audit.

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

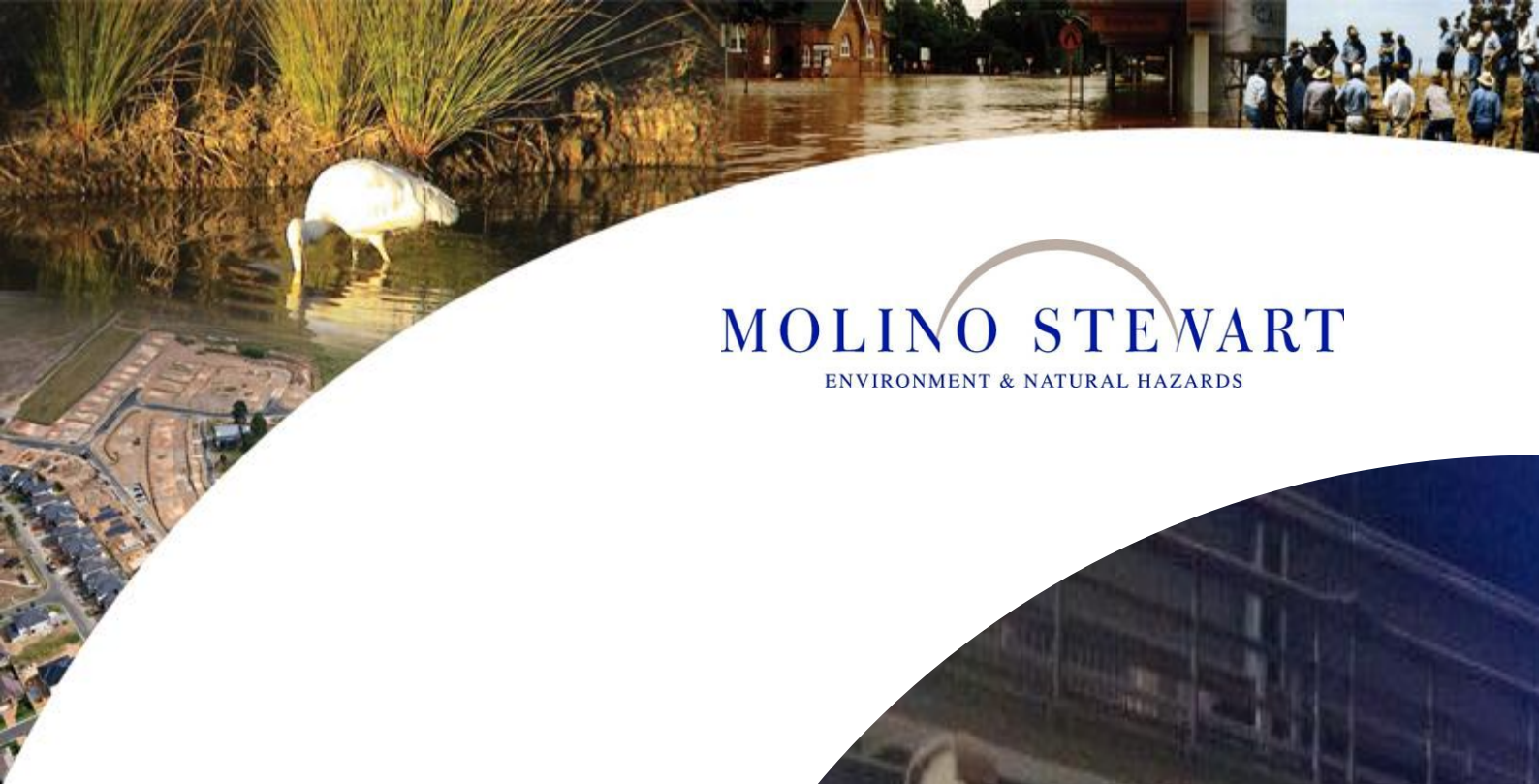
Yours faithfully



Dave Bell
MANAGER IRONMAKING

Copy to:

Manager Illawarra - Environment Protection and Regulation Division, Office of Environment and Heritage
General Manager Steelmaking
Manager Ironmaking
Sinter Plant Manager
Manager Environment
SEA Ironmaking & Major Projects
Legal Counsel



MOLINO STEWART

ENVIRONMENT & NATURAL HAZARDS



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

JULY 2013

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DOCUMENT CONTROL

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Author	Shireen Baguley

REVISION HISTORY

Date	Version	Name	Comments
11/6/13	1	Shireen Baguley	First draft for internal review
20/6/13	2	Steven Molino	Draft for client review
12/7/13	Final	Shireen Baguley	Final report

DOCUMENT APPROVAL

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

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1 THE AUDIT

1.1 SCOPE

An annual independent environmental compliance audit of the BlueScope Steel Ltd. Ore Preparation Upgrade Project (OPUP) was undertaken by Molino Stewart on the 4th and 5th June, 2013 as required by condition 4.1 of Development Consent DA No 06-0229 (issued on 3 July 2007).

The audit reviewed the project's performance via systems, records, procedures and site observations in relation to the conditions of the original development consent associated with the Ore Plant Upgrade Project (OPUP).

1.2 AUDIT TEAM

The audit was undertaken by Molino Stewart Pty Ltd. Steven Molino BSc BE, who is a RABQSA certified lead environmental auditor led the audits and was assisted by Shireen Baguley BE MEngSc.

1.3 WEATHER

The audit was undertaken on site on 4th and 5th June 2013 with review of some documentation taking place before the site visit.

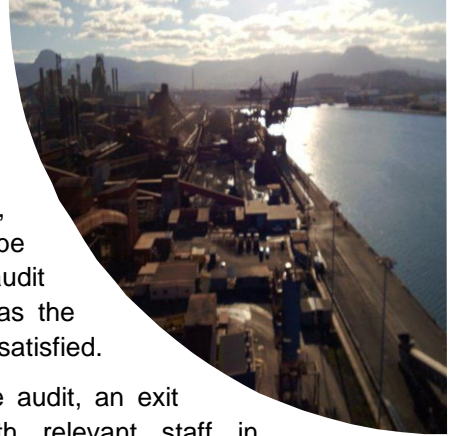
The weather was fine and the Sinter Plant was operating for the duration of the audit.

1.4 DETAILS

In general, the site was found to be compliant with the development consent requirements. There was one new non-compliance identified for the period since June 2012. In previous audits, there were three non-compliances identified that were yet to be formally closed out with the Department of Planning and/or the EPA (Previously DECCW). One of these non-compliances (Condition 4.1) has now been resolved. Of the two others, Condition 5.4 is associated with the above new non-compliance, which arises through a recent clarification by the Department of Planning and

Infrastructure (DoPI), while Condition 6.2 will be retained in future audit reports until such time as the requirements have been satisfied.

At the completion of the audit, an exit meeting was held with relevant staff in 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 DEVELOPMENT CONSENT CONDITIONS

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

2.1 CONSTRUCTION PHASE

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 'ITEM COMPLETE' listed.

2.2 OPERATIONAL PHASE

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

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:

- be conducted by a suitably qualified, experienced, and independent person who appointment has been endorsed by the Director-General;
- be consisted with ISO14010 – Guidelines and General Principles for Environmental Auditing, and ISO14011 – Procedures for Environmental Auditing or updated versions of these guidelines/manuals;
- assess the environmental performance of the development, and its effects on the surrounding environment
- assess whether the development is complying with the relevant standards, performance measures, and statutory requirements
- review the adequacy of the applicant's environmental management plans, procedures, and environmental monitoring program; and, if necessary
- recommended measures or actions to actions to improve the environmental performance of the plant, and/or the environment management and monitoring systems.

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 of the Department of Planning and Infrastructure. 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 5th and 6th June, 2013 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 Lawrence Zammit – Senior Environmental Advisor - Ironmaking – Major projects, and Leanne Barrett – Manufacturing Development Coordinator.

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 CLASSIFICATIONS

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

- **Compliant:** demonstrated compliance with 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.
- **Observation:** An item of evidence found during an audit. Observations may or may not require corrective action



6 AUDIT FINDINGS

No.	Impact	Approval Requirement	Evidence (Requested)	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.	Have closed no. 6 blast furnace. Production is tracked daily. 2 daily meetings are held daily report and the information from these feeds to daily review documentation. Daily review documentation shows Ironmaking monthly summary y.t.d. 3.6M T for previous 11 months.	Compliant
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.</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 premises.</p>	<p>Used to have a Harminie system for safety database. Have now moved to MARS. This is a compilation of databases. 1. register; 2 complaints; 3 tracking not related to Sinter Plant. Reviewed samples from both systems. Odour complaints had been received, however not related to the OPUP. Reviewed complaint handling and the staff investigated and found that these complaints related to blast furnace/slag production/watering down of slag. Complaint followed through and completed.</p>	Compliant

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 wind blown and traffic generated dust.	Fugitive Dust Emissions (FDE). Viewed - Site wide PRP 134 aimed at reducing dust across site from stockpiles. This has been closed out by EPA - one recommendation has been to improve stormwater collection from No. 4 subs area and this has been included EPL. A soakaway plant design is to be developed by 30/6/13 (progressing) and installed by 30/6/14. From this also arose stockpile EMP risk assessment (Sighted). PRP 133 [Holistic review of transport related dust and stormwater impacts leading to implementation of actions and works] (sighted), minimising FDE from transport related activities. Wheel baths or wash stations for trucks; risk assessment process developed for risk associated with moving stockpiles within Sinter plant (this process (sighted). Water carts and sweepers on roads; water sprays on stockpiles. Stockpile areas inspected. Roads clean. Complaint and complaint handling reviewed. Viewed a number of dust complaints. Investigated and completed. Viewed 98 C62078 - red dust 27/6/12 not OPUP: C227462 - noise & dust on 13/5/13 investigated. During plant inspection dust emissions from the mixing rolling drum were noted – refer to Appendix A. All other areas appeared well maintained.	Corrective action 1: investigate and control dust emissions from mixing rolling drum
2.3	Dust Emissions	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	PRP 133 [Holistic review of transport related dust and stormwater impacts leading to implementation of actions and works] (sighted). This focussed on minimising FDE from transport related activities - introduced a number of wheel baths for trucks 3 in the last 12 months. Fugitive dust management system has details actions for managing dust and stop work requirements. Drivers are given general inductions and contractors implement a performance monitoring procedure. Contractor documentation - SCE Industrial submits monthly compliance reports Oct 2012 viewed - covers fugitive emissions; hazards register; training conducted; reporting.	Compliant

			Also noted on DON (waste) that compliance with environmental responsibilities etc.	
2.4	Dust Emissions	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.	PRP133 and 134 as above. Stockpile management - viewed SP Risk Assessment for 17 area (Area B, iron ore pellets; LZ; LB + waste management technical officer). Complaints and handling procedures as per C2.3 above.	Compliant
2.5	Dust Emissions	The Proponent shall control dust emissions on all internal roads, trafficable areas and manoeuvring areas to minimise the potential for dust generation by sealing, or otherwise treating surfaces in a manner acceptable to the DG.	Evidence viewed as per C2.3 and C2.4 above.	Compliant
2.6	Discharge Limits	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 1.	Air quality report for Jan - Mar 2013 viewed. All emission requirements met. Test reports distributed to internal plant managers; corporate for AR; then EPA	Compliant
2.7	Waste Gases	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: 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		ITEM COMPLETE

		recommendations and an implementation program.		
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> <p>a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive;</p> <p>b) 8:00 am to 1:00 pm on Saturdays; and</p> <p>c) at no time on Sundays or public holidays.</p> <p>This condition does not apply in the event of a direction from police or other relevant authority for safety or emergency response.</p> <p>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>		ITEM COMPLETE
2.9	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 LAeq(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>The 35 dB(A) was a requirement against pile driving during construction - viewed HATCH report: Sinter Plant Crane Tower Piling Assessment compliant. DA requirement transferred to EPL; PRP 130; Hatch report dated 11/12/09; submitted to DoP 24/12/12. Noise measurements during operation and found to be fully compliant. Ongoing monitoring every 2 - 3 years; HATCH report covers WGCP et al. 24/5/13 report viewed. Statistical results indicate compliance with the DA limit and that this has not changed significantly since previous compliance checks performed in June 2012; Sept 2011. Compliance with the DA / PRP requirements indicates that the site does not have any impact on surrounding residences.</p> <p>Reviewed correspondence from EPA dated 23/4/10.: EPA approved a 'final noise monitoring assessment procedure' submitted on 2008. There was a removal of the requirement to meet L6.2 requirement for meeting a noise criterion of 35dB(A) LAeq(15 min) at the nearest resident. Noise monitoring now undertaken at the boundary as</p>	Compliant

			provided this is met, there is not a significant impact. This was also indicated in this EPA correspondence.	
2.10	Noise	<p>For the purpose of assessment of noise contributions specified under condition 2.9 of this consent, noise from the project shall be:</p> <p>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;</p> <p>b) measured at one metre from the dwelling façade to determine compliance with LA1(1 minute) noise limits; and</p> <p>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 Poilcy (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>This condition was a construction related condition. Construction related noise investigations were conducted by HATCH consultants. Noise survey results indicated there was no significant impact to the environment from pile driving activities during construction. Noise surveys undertaken by HATCH in compliance with the conditions listed in the EPL. A copy of the HATCH report was viewed.</p>	ITEM COMPLETE
2.11	Surface water quality	<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 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.</p>		ITEM COMPLETE

2.12	Surface water quality	The Proponent shall comply with section 120 of the Protection of the Environment Operations Act 1997 which prohibits the pollution of waters	<p>Water quality: 4 day and 8 day cycles for drain samples. Data goes into a database. Report is generated for statistical breaches. Have statistical breaches for EPA licences. 1/7/12 to 4/6/13. No breaches, however there were a number of 'stat breaches' which show that it went over a 50% or 90% percentile. Also viewed graphics of the previous 12 months, which confirmed above. Ore prep sinter plant monthly compliance report notes that the monthly sampling has been undertaken. All site stormwater directed to a detention basin then goes to the effluent treatment plant, clarified and pH dosed if necessary.</p> <p>Inspection of site showed that the stormwater is being directed to a detention basin. From there, travels to the effluent treatment plant, then a thickener before discharge. Water is treated to remove pollutants, pH adjustments made. Final discharge to Ironmaking East drain. Site wide PRP 134 (30/6/2012), details controls around stockpiles. Refer back up re No. 4 subs areas - include a soakaway area (EPL licence condition E6). EPA response was to do stockpile risk assessments (refer earlier condition). If it is identified that there is a potential for hazardous material, then there is a requirement for additional consultation/investigation. Otherwise, says that the plan is fine. 8/5/2011. BSL report dated 30/11/2011 with mitigation measures. EPA response 12/2/13 noting satisfied and revising EPL as noted re soakaway. Many of the drains that are collecting stormwater are marked with a 'fish' shaped steel plate. This is an alert for spills management. There are spill management/rectification processes. 'One Point Lesson' for Environmental Incident Drain Investigation' viewed. Last revised 7/6/12, and documents response and investigation process.</p>	Compliant
2.13	Waste	The Proponent shall maximise treatment and/ or beneficial		ITEM

	Management	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.		COMPLETE
2.14	Waste 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.	John Heslin (by-products/recycling engineer) advised no waste material is brought into the BSL site.	Compliant
2.15	Waste 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.	A divisional waste management procedure was provided on request. The divisional waste management procedure outlines all handling and treatment of waste for the site. Covers internal movement and storage of waste. Covers departments and contractors, disposal of waste generated onsite or being an externally generated waste material onsite. References PoEO Act; Waste Classification Guidelines Part 1 : Classifying Waste (OEH); and EPL. Has waste process flow chart and 3 docket tracking. Dated April 2012. Reviewed DON 9979. Has immobilisation certificate. Authorised disposal request for material to be stored/removed. Shows authorisation number should it require disposal. Street sweeping undertaken by contractor (Veolia); appears well maintained. Numerous collection points observed for waste - general rubbish and recyclables.	Compliant
3	Environmental Monitoring and Auditing			
3.1	Air Quality	To establish compliance with C2.6 of this Approval, the Proponent shall monitor the emissions from the Room De-dusting Stack & the WGCP Exhaust Stack at the monitoring points listed by the EPA in the existing EPL. Monitoring shall be undertaken within 3 months following recommissioning of the Plant, and then at a frequency specified in the EPL and utilising test methods agreed with	Ongoing monitoring is occurring, according to EPL requirements. Results observed. Reports go to plant managers etc. Noted on monthly compliance reports.	Compliant

		the EPA.		
3.2	Air Quality	<p>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 measures would be implemented, and how the effectiveness of these measures would be assessed and reported to the DG.</p>		ITEM COMPLETE
3.3	Noise	<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> <p>a) noise monitoring consistent with the guidelines provided in the New South Wales Industrial Noise Policy (EPA, 2000), to assess compliance with C2.9 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> <p>The noise program shall be documented in a report which shall be submitted at various times as specified in C 3.4.</p>		ITEM COMPLETE

3.4	Noise Monitoring	<p>The Proponent shall provide the DG and the EPA with a report which includes the noise monitoring procedures and results referred to under C3.3 of this Approval. The report is to be provided: a) six months prior to commencement of construction (final monitoring procedures); b) four months prior to commencement of construction (draft monitoring procedures); c) prior to commencement of construction (monitoring results); and d) three months after commissioning of the project (monitoring results). If the noise monitoring report identifies any non-compliance with the noise limits imposed under this approval (refer to C2.9), 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 DG and EPA.</p>		ITEM COMPLETE
4 Compliance monitoring and tracking				
4.1	Compliance tracking	<p>The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this approval (refer to condition 2.9), the Proponent shall include, but not be limited to:</p> <ul style="list-style-type: none"> a) provisions for periodic review of the compliance status of the project against the requirements of this approval; b) provisions for periodic reporting of 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/or Environmental Management Systems Auditing; and d) mechanisms for rectifying any non-compliance identified during environmental auditing or review of compliance. 	<p>A number of compliance monitoring systems were demonstrated to be in place:</p> <ol style="list-style-type: none"> 1. If there is a complaint or enquiry, there is a plant process compliance investigation sheet. This goes through a series of checks to investigate operations across plant. This is attached to an incident report. Ore Preparations - Sinter Plant Monthly Compliance Report April 2013 shows that across a range of legal requirements how the compliance is tracking - this process forms the compliance tracking program with provisions for point a) and b). This audit meets requirement c). Action plan from previous Independent Audit report forms Project Corrective Action Log. CA Log assigns responsibility and action by date. Noted these actions being signed off as completed. 	<p>Compliant</p> <p>Observation 1: 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,</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. A letter dealing with the non-compliance identified during the previous annual independent environmental audit report (IEAR) has been submitted to the Department of Planning. Correspondence from DoPI received noting that submission of the IEAR is acceptable as a means of tracking compliance with project approval.</p>	<p>independent auditing and existing EPL requirements in order to streamline the compliance tracking process and obtain approval from the DoPI and EPA.</p>
5	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>Correspondence from BSL to DoPI seeking clarification on the content of public information. Response from DoPI refers to condition 5.4 as being relevant in relation to public availability of documentation.</p>	ITEM NOW COMPLETE
5.2	Public inspection of documents	<p>Prior to the commencement of construction of the project, the Proponent shall ensure that the following are available for community complaints and enquiries for the life of the project (including construction and operation): 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. 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>		ITEM COMPLETE

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 relation to the complaint and enquiry, the reason(s) why no action was taken. <p>The Complaints and Enquiries Register shall be made available for inspection by the DG upon request.</p>	<p>Documentation from both the MARS and Harminie systems both viewed. MARS system is up to date. A number of complaints were sampled on the MARS system. Complaints and followed through and completed. Self reports also noted. A number of compliance monitoring was observed. A copy of the divisional complaints and complaints procedure dated Apr 2012 viewed. If there is a complaint or enquiry, there is a plant process compliance investigation sheet. This goes through a series of checks to investigate operations across plant. This is attached to an incident report</p>	<p>Compliant</p>
5.4	New website, or dedicated pages within the existing website for provision of electronic information associated with the proposal	<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 	<p>A letter was written to DoP in May 2011 seeking clarification. DoPI advised in Sept 2012 that, in relation to CI 5.1 and 5.4, the information to be provided is in CI 5.4. The DoPI has instructed in the latest correspondence that this information is required to be provided electronically. Details of this information are required on a public website.</p>	<p>Non-compliance f details of this information made available on a BSL public website.</p>

		<p>approval, licence or permit required and obtained in relation to the project;</p> <p>c) a copy of each strategy, plan and program required under this approval; and</p> <p>d) the outcomes of compliance tracking in accordance with condition 4.1 of this approval.</p>		
6	Environmental Management			
General				
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> <p>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;</p> <p>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:</p> <p>i) measures to monitor and manage dust emissions</p> <p>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</p> <p>iii) measures to monitor and control noise emissions during construction works.</p>		ITEM COMPLETE

		<p>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 during construction.</p> <p>The Plan shall be submitted for the approval of the DG 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 DG. Construction works shall not commence until written approval has been received from the DG.</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 sulfate soils, an Acid Sulfate Soil Management Plan prepared in accordance with guidance provided in Acid Sulfate Soil Manual (Acid Sulfate 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, including, but not necessarily limited to:</p> <p>(i) details of construction activities and a schedule for</p>	<p>A non-compliance was raised against this in 2010 audit. EPL sets out communication requirements (ref correspondence 18/5/11) e.g. if pile driving would do monitoring; public notifications etc.</p> <p>Letter dealing with the non-compliance identified during the previous annual independent compliance audit report has been submitted to the Dept of Planning.</p> <p>DoPI has responded, seeking clarification on whether construction is occurring - viewed letter 25/9/12. BSL is continuing communications with DoPI to resolve this matter.</p>	<p>Corrective action 2: clarification of construction status with DoPI to provide information which may allow this condition to be closed out.</p>

		<p>construction works;</p> <p>(ii) identification of construction activities that have the potential to generate noise and/or vibration impacts on surrounding land uses, particularly residential areas;</p> <p>(iii) a detailed description of what actions and measures would be implemented to ensure that these works would comply with the relevant noise and vibration criteria/guidelines</p> <p>(iv) Procedures for notifying residents of construction activities that are likely to effect their noise and vibration amenity, as well as procedures for dealing with and responding to noise complaints and enquiries; and</p> <p>(v) A description of how the effectiveness of these actions and measures would be monitored during the proposed works, clearly indicating how often this monitoring would be conducted, how the results of this monitoring would be recorded, and if any non-compliance is detected.</p> <p>d) a Construction Traffic Management Plan to detail how heavy vehicle movements associated with the project would be managed during the 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	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	Evidence in previous audit, noted as complete.	ITEM COMPLETE

		Steelworks to reflect the works subject to this Approval.		
7	Environmental Reporting			
General				
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.	Divisional procedure for Incident and Near Miss Management for Health Safety and Environment dated January 2013, documents internal and external reporting to agencies. Does not include DoPI as one of the external agencies. Not had any incidents with any off-site impacts. All incidents that have resulted in breaches to the EPA licence are detailed in Section C of the annual return and are signed off by every L2, L3 and L4 manager. Document viewed, with signoffs. No incidents for Ore preparation.	Corrective action 3: add DoPI to the list of agencies to be notified as set out in the divisional procedure for incident management
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 DG	Divisional procedure for Incident and Near Miss Management for Health Safety and Environment dated January 2013, documents internal and external reporting to agencies. There have not been any incidents with actual or potential off-site impacts.	Compliant
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.	Divisional procedure for Incident and Near Miss Management for Health Safety and Environment dated January 2013, documents the investigation requirements, which includes identification of root cause of incident; hazard control review; and identification of contributing system failures.	Compliant

7 NON-COMPLIANCE, CORRECTIVE ACTION AND OBSERVATION LIST

Corrective Actions:		
Refer to the Corrective Action Item list attached 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.		
Number of non-compliances raised: 1; Number. of Corrective Actions Raised: 4	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
Non-compliance items						
1	Details of project information made available on a BSL public website.					
Correction Action items						
1	Investigate and control fugitive dust emissions from mixing rolling drum					
2	Clarification of construction status with DoPI to allow close out or otherwise of Condition 6.2.					
3	Add DoPI to the list of agencies to be notified as set out in the divisional procedure for incident management					
Observations						
1	Investigate the possibility of undertaking a review and consolidation of OPUP (DA 06-0229) WGCP (DA 260201) and GP Plant (MOD5042005-i) Das, IEA and existing EPL requirements in order to stream line EPA compliance tracking process and obtain approval from the DoPI and EPA.					



APPENDIX A - PLATES



Plate 1: Dust emissions from the rolling mixing drum



Plate 2: Dust emissions from the rolling mixing drum

APPENDIX B: SCHEMATIC OF PLANT

