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06 May 2019

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Attention: Mr Chris Ritchie

Dear Chris

**BLUESCOPE STEEL (AIS) PTY LTD – INDEPENDENT ENVIRONMENTAL AUDIT REPORT
SINTER PLANT EMISSIONS REDUCTION PROJECT (WGCP) - DEVELOPMENT APPROVAL
26-02-01 AND THE SINTER PLANT ORE PREPARATIONS UPGRADE PROJECT (OPUP) -
DEVELOPMENT APPROVAL 06-0229.**

This report addresses all independent environmental audit requirements for the WGCP (as required by Condition 7.6 of Development Consent DA No 26-02-01, issued 1 August 2001), Gypsum Plant (as required by Condition 7.6 of Development Consent DA No 26-02-01, MOD-50-4-2005-i, issued 22 September 2005) and OPUP (as required by Condition 4.1 of Development Consent DA No 06-0229, issued on 3 July 2007).

Should you have any questions in relation to the attached report, please contact Ms. Anita Rojas on (02) 4275 7522.

Yours faithfully,

A handwritten signature in black ink, appearing to read "David Scott".

David Scott
MANAGER COKEMAKING & IRONMAKING

Independent Environmental Audit (2019)

Audit Report

[DA No 26-02-01, MOD-50-4-2005-I and MOD 2 and DA No 06-0229, MOD 1]

For BlueScope Steel Ltd

23 April 2019



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Executive Summary

BlueScope Steel (BSL) operates a Sinter Plant for preparing the iron ore for blast furnace feed at its Port Kembla steelworks (PKSW) in NSW.

Arriscar Pty Ltd (Arriscar) was engaged by BSL in 2019 to undertake an IEA for the Sinter Machine Emission Reduction Project (SMERP) (i.e. Waste Gas Cleaning Plant, WGCP), Gypsum Plant and Ore Preparation Upgrade Project (OPUP). The IEA was undertaken to assess BSL's compliance with the requirements of the relevant regulatory approvals for these developments (i.e. Primarily the conditions in the relevant Development Consents and Environment Protection Licence). The environmental performance of the developments, and their effects on the surrounding environment, were also considered.

This report addresses all the required IEAs for the SMERP (WGCP), Gypsum Plant and OPUP developments.

The IEA was undertaken in accordance with the methodology outlined in AS/NZS ISO 19011:2018 *Guidelines for Auditing Management Systems* [Ref. 9] and the NSW Government's *Independent Audit, Post-Approval Requirements* [Ref. 8]. It included four major verification activities:

- Agency and community consultation (Undertaken prior to site visit);
- Personnel interviews;
- Document reviews; and
- Site and equipment inspections.

Site visits were conducted on 27-28 February and 1 March 2019.

The overall findings of the IEA may be summarised as follows:

Environmental Management

- Overall, BSL's Environmental Management System (Refer to Section 4.1.1) and management plans (Refer to Section 4.1.3) appear to be adequate for the identified environmental aspects and potential impacts (Refer to Section 4.1.2).

Environmental Performance

- The overall environmental performance for the Sinter Machine Emission Reduction Project (WGCP), Gypsum Plant and OPUP is good, which is evidenced by the:
 - Recording of no complaints, other than one regarding a visible emission from the WGCP stack, for the Sinter Machine Emission Reduction Project (WGCP), Gypsum Plant and OPUP since the previous IEA in 2016 (Refer to Section 4.2.1).
 - Reporting of only two non-compliances relating to exceeding limits in the Environment Protection Licence since the previous IEA in 2016 (Refer to Section 4.2.1)
 - Programs being undertaken by BSL to reduce potential future impacts (i.e. Discontinuing Ammonia Gas injection, completing the IMED Drainage Diversion Project (PRP 176), and investigating the re-use of 'Activated Char Undersized' (ACU) – Refer to Section 4.2.2).

Compliance Performance

- BSL has demonstrated proactive monitoring of compliance and active and open self-reporting of potential non-compliances to the regulatory authorities and to a community consultation panel.

Despite the Non-Compliances identified during the IEA, the overall level of compliance and environmental performance for the Sinter Machine Emission Reduction Project (WGCP), Gypsum Plant and OPUP is good and the identified non-compliances are not expected to pose a significant environmental risk.

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Notation

Abbreviation	Description
A/G	Above Ground
AC	Active Char
Arriscar	Arriscar Pty Limited
AS	Australian Standard
BANZ	BlueScope Australia and New Zealand
BSL	BlueScope Steel Ltd
CC	Consent Condition
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
DA	Development Application
DCS	Distributed Control System
DG	Dangerous Good
Dioxin/Furans	polychlorinated dibenzo-p-dioxins (PCDD) and polychlorinated dibenzo furans (PCDF) as 2,3,7,8 tetrachloro-dibenzo-p-dioxin [(TCDD) as NATO toxic equivalency factors (TEF)]
DP&E	NSW Department of Planning and Environment
EMP	Environmental Management Plan
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
FDMS	Fugitive Dust Management System
g/m ³	Grams per cubic metre
H ₂ O	Water
HCl	Hydrochloric Acid
HSEC	Health, Safety, Environment and Community
IBC	Intermediate Bulk Container
IEA	Independent Environmental Audit
IMED	Iron Making East Drain
ITP	Inspection and Test Plan
kPag	Kilopascal (gauge)

Abbreviation	Description
LA10(15minute)	The sound pressure level that is exceeded for 10 per cent of the time, when measured over a 15-minute period
LAWWNE	Land Air Water Waste Noise Energy
LBL	Load Based Licence
m	Metres
MARS	Management of All Risks System
mg/l	Milligrams per litre
mg/Nm ³	Milligrams per cubic metre
MoC	Management of Change
MSDS	Material Safety Data Sheet
Mtpa	Million tonnes per annum
N ₂	Nitrogen
NH ₃	Ammonia
NO _x	Oxides of Nitrogen (e.g. Nitrogen Dioxide)
PD	Position Description
P&ID	Piping & Instrumentation Diagram
PHA	Preliminary Hazard Analysis
PKSW	Port Kembla Steelworks
PLC	Programmable Logic Controller
POEO Act	NSW Protection of the Environment Operations Act
PPE	Personal Protective Equipment
ppm	Parts per million
PRP	Pollution Reduction Program (As detailed in EPL)
PURS	Process User Requirement Specification
RPZ	Reduced Pressure Zone
SCBA	Self-Contained Breathing Apparatus
SEE	Statement of Environmental Effects
SHI	Sumitomo Heavy Industries
SMERP	Sinter Machine Emission Reduction Project
SMS	Safety Management System

Abbreviation	Description
SS	Suspended Solids
SO ₂	Sulphur Dioxide
SO _x	Oxides of Sulphur (e.g. Sulphur Dioxide, Sulphur Trioxide)
SOP	Standard Operating Procedure
SRG	Sulphur Rich Gas
tpa	Tonnes per annum
UPS	Uninterrupted Power Supply
VESDA	Very Early Smoke Detection Alarm
VOC	Volatile Organic Compound
WGCP	Waste Gas Cleaning Plant
WHS or WH&S	Work Health and Safety
WO	Work Order

1 INTRODUCTION

1.1 Background

BlueScope Steel (BSL) operates a Sinter Plant for preparing the iron ore for blast furnace feed at its Port Kembla steelworks (PKSW) in NSW.

The Sinter Plant produces Sulphur Rich Gas (SRG) containing sulphur dioxide (SO₂), which is treated in a Waste Gas Cleaning Plant (WGCP) and used to produce Gypsum (Solid Calcium Sulphate) as a by-product in a Gypsum Plant. These facilities (Refer to Sections 1.1.1 to 1.1.3) are subject to conditions of development consent, which require a periodic Independent Environmental Audit (IEA).

Arriscar Pty Ltd (Arriscar) was engaged by BSL in 2019 to undertake an IEA for the Sinter Machine Emission Reduction Project (SMERP) (i.e. Waste Gas Cleaning Plant, WGCP), Gypsum Plant and Ore Preparation Upgrade Project (OPUP) developments. This report addresses all of the required IEAs for these developments.

The auditor for the 2019 IEA (Refer to Section 1.2) was approved by the Department of Planning and Environment (DP&E) and the audit was undertaken on 27-28 February and 1 March 2019.

This report includes the findings of the audit (Refer to Section 4 and Appendix B) and identified recommended actions and opportunities for improvement (Refer to Section 5).

1.1.1 Sinter Machine Emission Reduction Project (Waste Gas Cleaning Plant)

As part of its environmental improvement and sulphur recovery program, a Development Application (DA) for a new Waste Gas Cleaning Plant (WGCP) was submitted by BSL to the Department of Urban Affairs and Planning in 2001 (DA No 26-02-01).

The purpose of the WGCP is to remove sulphur dioxide (SO₂), nitrogen oxides (NO_x), Volatile Organic Compounds (VOCs) and any dust not captured by the precipitators from the sinter gas before it is discharged to the atmosphere.

Consent was granted for the DA subject to the conditions listed in the notice of Determination of a Development Application Pursuant to Section 80 of the Environmental Planning and Assessment Act 1979 - Application No. 26-02-01. The consent conditions were subsequently modified (DA No 26-02-01, MOD 2) in May 2016 to remove some conditions and to amend some reporting requirements.

The WGCP was built in 2003.

1.1.2 Gypsum Plant

Construction and operation of a Gypsum Plant was approved in 2005 as a modification to the Development Consent for the WGCP (DA No 26-02-01, MOD-50-4-2005-i). This plant treats Sulphur Rich Gas (SRG) from the WGCP and produces solid Gypsum (Calcium Sulphate) for sale.

The Gypsum Plant was commissioned in 2007.

1.1.3 Ore Preparation Upgrade Project

The reline of the No.5 Blast Furnace in 2009 presented the opportunity to upgrade the Sinter Plant and to thereby lower operating cost and fuel rate by supplying more sinter to the furnaces.

This modification, known internally as the Ore Preparation Upgrade Project (OPUP), involved:

- Lengthening the strand on the No.3 Sinter Machine (Refer to Photograph 1) from 84 to 96 m to increase the grate area and increasing the bed height by increasing the strand side plates from 500mm to 700mm. The existing strand width and main fans were retained.
- Widening the cooler and adding a fourth cooler fan to achieve the required cooling capacity for the higher sinter levels.
- Replacing the existing line burner with a new ignition furnace. The new furnace uses four burner rows and is fuelled by Natural Gas.
- Replacing the strand feeder with a new feed unit.
- Rebuilding the electrostatic precipitators (After thirty years of service) to include a fourth zone and to minimise the particulate load to the WGCP.
- Some changes to incoming and outgoing conveying systems.

Consent was granted for the DA subject to the conditions listed in the Project Approval under Section 79J of the Environmental Planning and Assessment Act 1979 - Application No. DA No 06-0229 (Issued on 3 July 2007). The consent conditions were subsequently modified (DA No 06-0229, MOD 1) in April 2016 to remove some conditions and to amend some reporting requirements.

Photograph 1 No.3 Sinter Machine (1 March 2019)



All work was complete in 2009. However, in 2011 a decision was made to greatly reduce production at the PKSW by closing No.6 Blast Furnace. The Sinter Plant now runs at approximately 40% of its capacity; however, the plant the equipment that was installed as part of OPUP continues to be used.

The No.3 Sinter Machine was originally commissioned in 1975 and is the only Sinter Machine currently in operation at the Sinter Plant. It is the only internal supply of Sinter Fines for the No.5 Blast Furnace.

1.2 Audit Team

The audit was carried out by Mr Philip Skinner, as the lead auditor, from Arriscar.

Mr Skinner is a chemical engineer with over 25 years' experience in management system implementation and auditing. He is a certified lead environmental auditor and has undertaken numerous audits and safety / environmental projects for a wide range of industries.

Prior written approval for Mr Skinner to lead the audit was obtained from the Department of Planning and Environment (Refer to Appendix C).

1.3 Audit Objectives

The overall objective was to undertake an IEA for the SMERP (WGCP), Gypsum Plant and OPUP, as required by the relevant consent conditions (CCs) from the Development Consent (i.e. CC # 7.6 & 7.7 of Development Consent DA No 26-02-01, MOD-50-4-2005-i and MOD 2, and CC # 4.1 and 4.2 of Development Consent DA No 06-0229, MOD 1 - Reproduced below).

Note: Some consent conditions have been removed or modified since the previous IEA in 2016 (Refer to DA No 26-02-01, MOD 2 and DA No 06-0229, MOD 1). These changes are highlighted in this report using red text.

CC # 7.6 & 7.7 of Development Consent DA No 26-02-01, MOD-50-4-2005-i & MOD 2

*Within 12 months of commissioning the Waste Gas Cleaning Plant, and every three years thereafter, unless the **Secretary** directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit.*

The Independent Environmental Audit must:

- (a) be conducted by a suitably qualified, experienced, and independent person whose appointment has been endorsed by the **Secretary**;*
- (b) be consistent with ISO 14010 – Guidelines and General Principles for Environmental Auditing, and ISO 14011 – Procedures for Environmental Auditing, or updated versions of these guidelines/manuals ¹;*
- (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) recommend measures or actions to improve the environmental performance of the plant, and/or the environmental management and monitoring systems.*

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

¹ ISO 14010 and ISO 14011 have now been replaced by ISO 19011:2018 – Guidelines for Auditing Management Systems.

CC # 4.1 and 4.2 of Development Consent DA No 06-0229, MOD 1

Within three years of the last Independent Environmental Audit in June 2013, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:

- (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- (b) include consultation with the relevant agencies;*
- (c) assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any other licences or approvals;*
- (d) review the adequacy of any approved strategy, plan or program required under the approvals identified in part c); and, if appropriate*
- (e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under this approval.*

Within three months of commissioning this audit or as otherwise agreed by the Secretary, the Proponent shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

1.4 Audit Scope

The scope of the IEA was based on the NSW Government's *Independent Audit, Post-Approval Requirements* [Ref. 8], consultation with relevant stakeholders (Refer to Section 2.2) and the requirements specified in the DP&E's letter approving the auditor (Refer to Appendix C).

The audit scope included:

1. an assessment of compliance with:
 - a. conditions of consent from Development Consent DA No 26-02-01, MOD-50-4-2005-I and MOD 2; and, Development Consent DA No 06-0229, MOD 1 applicable for ongoing operation of the SMERP (WGCP), Gypsum Plant and OPUP developments (Refer to Section 4.3.2 and Appendix B);

Note: Some Consent Conditions for the construction, commissioning and initial operations (c. first 12 months) phases are no longer applicable. Many of the CCs for these initial phases have subsequently been removed - Refer to DA No 26-02-01, MOD 2 and DA No 06-0229, MOD 1. Therefore, only the status of each Consent Condition applicable to the ongoing operation of the SMERP (WGCP), Gypsum Plant and OPUP developments was assessed in the 2019 IEA.

The Consent Conditions relating to Hazards and Risk Management were not assessed in the IEA since compliance with these Consent Conditions is assessed separately during the periodic Hazard Audit.

- b. all post-approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans (Refer to Section 4.1.3 and Appendix B);
 - c. all environmental licences and approvals applicable to the development including relevant conditions from the environmental protection licence (EPL No 6092) issued under the Protection of the Environment Operations Act 1997 (Refer to Section 4.3.2 and Appendix B);

2. an assessment of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - a. actual impacts compared to predicted impacts documented in the environmental impact assessment (Refer to Section 4.2.2);
 - b. the physical extent of the development in comparison with the approved boundary, and any potential off-site impacts (Refer to Section 4.2.2);
 - c. incidents, non-compliances and complaints that occurred or were made during the audit period (Refer to Section 4.2.1 and Section 4.3.1);
 - d. the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit (Refer to Section 2.2 and Section 2.3.1);
 - e. feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period (Refer to Section 2.3.1);
3. the status of implementation of previous Independent Audit findings, recommendations and actions (if any) (Refer to Section 4.3.5);
4. a high-level review of the project's environmental management systems (if any), including assessment of any third-party certification of them, the type, nature and scope of the systems having regard to the nature and scale of the development, and the implementation of the systems (Refer to Section 4.1.1). Note: An IEA is not expected to comprise a management system audit; however, any key deficiencies identified in the system should be discussed;
5. a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate (Refer to Section 4.1.3 and Appendix B); and
6. any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

The scope of the IEA included all operational areas included in the relevant DAs for the SMERP (WGCP), Gypsum Plant and OPUP developments and included all organisational units, activities and processes that are referred to in the Consent Conditions (e.g. noise monitoring, community consultation, wastewater treatment processes, etc.).

1.5 Audit Period

This IEA covers the three-year period since the previous IEA was undertaken in March 2016.

2 METHODOLOGY

2.1 Introduction

The IEA was undertaken in accordance with the methodology outlined in AS/NZS ISO 19011:2018 *Guidelines for Auditing Management Systems* [Ref. 9] and the NSW Government's *Independent Audit, Post-Approval Requirements* [Ref. 8].

2.2 Development of Audit Scope

The conditions of development consent and the relevant conditions of the EPL were the principal criteria against which compliance was assessed in the IEA. The conditions of development consent also refer to other documents that were considered during the audit (e.g. Environmental Management Plan, Statements of Environmental Effects, etc.).

Consultation with the Department, and other agencies and stakeholders, including the Community Consultative Committee was also undertaken to obtain their input into the scope of the audit (Refer to Section 2.3.1). The specific issues raised during consultation were investigated and the findings are reported in Section 4.2.2.

To provide a structure for the audit, Arriscar utilised an Audit Table (Refer to Table 11 in Appendix B.1) based on the conditions of development consent, as summarised in Table 1 below. Where a condition from the EPL is already included (partly or in full) in a condition of development consent, the audit findings were listed in the Audit Table under the relevant consent condition (With a cross-reference to the condition number from the EPL).

Relevant conditions from the EPL that are additional to the conditions of development consent were also considered during the audit, as summarised in Table 2 below, and are listed in a separate Audit Table (Refer to Table 12 in Appendix B.2).

Two of the conditions of development consent for the Gypsum Plant replace the equivalent conditions of development consent for the WGCP (i.e. Condition Nos. 1.2 and 3.4). In this case, only the conditions of development consent for the Gypsum Plant are listed in the following table and the Audit Table. The additional conditions of development consent for the Gypsum Plant are identified by an "A" subscript (e.g. Condition No. 1.2A).

'General and Mandatory Conditions for all EPA Licences' are included in Attachment A of the development consent for the WGCP. These are listed in Table 1 with an "A" prefix (e.g. A1.1).

Table 1 Conditions of Development Consent

Part	Description	Relevant Condition/s of Development Consent		
		WGCP (DA No 26-02-01, MOD 2)	Gypsum Plant (DA No 26-02-01, MOD-50-4-2005-i)	OPUP (DA No 06-0229, MOD 1)
A	GENERAL / ADMINISTRATIVE CONDITIONS	1.1, 1.3-1.10, 2.5, 4.1, A1.1-A1.2 & A4.1	1.2 & 1.2A	1.1-1.6
B	ENVIRONMENTAL MANAGEMENT PLANS	3.2-3.3	3.4	6.1-6.3
C	COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT / COMPLAINTS	4.55 & A2.1-A2.2	-	5.1-5.4
D	COMPLIANCE MONITORING AND REPORTING	2.1-2.4	-	-
E	ENVIRONMENTAL STANDARDS AND CONDITIONS	4.2, 4.6-4.7, 4.10-4.14, 4.20, 4.22, 4.30-4.32, 4.34, 4.37-4.42, 4.45-4.54	4.21A & 4.21B	2.1-2.6, 2.9-2.15
F	ENVIRONMENTAL MONITORING / AUDITING AND RECORDING CONDITIONS	-	-	-
G	ENVIRONMENTAL REPORTING	7.4-7.7 & A3.1-A3.8	-	4.1-4.2 & 7.1-7.3

Table 2 Relevant EPL Conditions

Section	Description	Relevant Condition/s of EPL
3	LIMIT CONDITIONS	L2.4, L3.1-L3.5, L6.2-L6.3
4	OPERATING CONDITIONS	O3.2, O3.5, O4.17-O4.18
5	MONITORING AND RECORDING CONDITIONS	M1.1-M1.3, M2.1-M2.2, M2.5-M2.6, M3.1, M8.1-M8.3, M9.1-M9.2
6	REPORTING CONDITIONS	R4.1-R4.5
9	SPECIAL CONDITIONS	E5.1-E5.10, E7.1-E7.7

2.3 Audit Process & Compliance Evaluation

Four major verification activities were undertaken to determine the compliance status and to assess the adequacy of post approval documentation:

- Agency and community consultation (Undertaken prior to site visit);
- Personnel interviews;
- Document reviews; and
- Site and equipment inspections.

Site visits were conducted on 27-28 February and 1 March 2019.

2.3.1 Agency and Community Consultation

Prior to the commencement of the site inspection (refer to Section 2.3.5), the auditor contacted (by phone) each of the key agencies with a role in regulating the development to obtain their feedback and to draw the auditor's attention to any key issues. This included representatives of the:

- Department of Planning and Environment (DP&E) [18 February 2019];
- Environment Protection Authority (EPA) [14 February 2019]; and
- Department of Health (Health NSW) [15 February 2019].

The auditor also contacted (by phone) the chair of the community consultative committee [15 February 2019].

Overall, the feedback received was positive and no major issues were raised by any of the contacted representatives.

The EPA representative confirmed that the IMED diversion project has been completed and noted that BSL are discontinuing Ammonia injection and are undertaking trials to re-use undersized char. These changes were considered in the IEA (Refer to Section 4.2.2).

The chair of the community consultative committee noted that BlueScope was attending the scheduled committee meetings and had been responsive to the committee members queries. The emission of dusts from the waste stockpile area located in the BSL Alliance & Recycling Area was also noted by the chair of the committee. Although this area is not strictly within the scope of the IEA, it does potentially relate to the trials being undertaken to re-use undersized char. Therefore, the waste stockpile area was visited during the site inspection.

2.3.2 Personnel Interviews

Personnel with various responsibilities were interviewed during the site visits. All interviewed personnel were extremely helpful and open during the audit.

The main personnel interviewed during the site visit are listed in Table 3. Additional operational personnel were also interviewed during the site inspections.

Table 3 Personnel Interviewed

Name	Title
Richard Lorenc	Ore Preparation Operations Manager
David Jones	Business Engineer
Lawrence Zammit	Senior Environmental Advisor
Anita Rojas	Environmental Advisor
Tim Webb	Operations Engineer
Mark Walsh	Process Engineer
John Heslin	By-products Recycling Engineer
Matt Hunter	Asset Strategy Engineer

The findings and recommendations from the personnel interviews are listed in Appendix B.

2.3.3 Opening and Closing Meetings

The objectives, scope, required resources and methodology for the IEA were discussed during the opening meeting. The preliminary audit findings and recommendations were presented at the closing meeting, and the post-audit actions were confirmed.

The opening and closing meetings were attended by Richard Lorenc (Ore Preparation Operations Manager).

2.3.4 Document Reviews

Samples of corporate and site-specific procedures were reviewed. Random checks of completed forms were also undertaken to check the degree of completion and to assess the effectiveness of the systems in place.

A full listing of the documentation reviewed during the audit is provided in Appendix A.

The findings and recommendations from the document reviews are listed in Appendix B.

2.3.5 Site and Equipment Inspections

A site inspection was carried out on 28 February and 1 March 2019. All operational locations (As listed in Section 2.4) were observed during these inspections.

The findings and recommendations from the site and equipment inspections are listed in Appendix B. Photographic evidence is also included where relevant.

2.4 Compliance Assessment

The compliance status for each relevant requirement is reported in Section 4 and was assessed in accordance with the following criteria from the NSW Government's *Independent Audit, Post-Approval Requirements* [Ref. 8].

Table 4 Compliance Assessment Criteria [Ref. 8]

Category	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-Compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Observations and notes may also be included (e.g. to identify any opportunities for improvement in relation to a compliance requirement or any other aspect of the development).

3 OVERVIEW OF FACILITY AND OPERATIONS

3.1 Location and Layout of Sinter Plant

The Sinter Plant (Including the WGCP and Gypsum Plant) is located on land close to Christy Drive, Port Kembla, NSW. A site location map is shown in Figure 1 and a layout diagram of the Sinter Plant (Including the WGCP and Gypsum Plant) is shown in Figure 2.

The Sinter Plant (Including the WGCP and Gypsum Plant) includes the following main components:

- Sinter gas booster fans (to increase pressure of sinter gas from Sinter Plant to WGCP);
- Moving bed carbon adsorbers;
- Char regenerator;
- Char Conveyors, Storage & Make-up system;
- Dedusting & Dust Collection system;
- Anhydrous ammonia storage, vaporiser and injection system;
- Sulphur Rich Gas Handling & Caustic storage (Treatment chemical);
- Water Treatment Plant;
- Gypsum plant;
- Shared utilities; and
- Control room, electrical switches room, workshop and offices.

There are four licenced discharge points associated with these facilities:

- Point 2 = Sinter machine room dedusting stack
- Point 107 = Sinter Plant Waste Gas Cleaning Plant Stack
- Point 151 = Number 3 Sinter Machine Stack (Discharge point during Sinter Plant Waste Gas Cleaning Plant Bypass)
- Point 89 = Ironmaking east drain (012) - overflow of weir adjacent to sign marked "Ironmaking East Drain"

The following photograph shows the Sinter Plant (right of photo) and the WGCP (left of photo).

Photograph 2 Sinter Plant and WGCP (1 March 2019)



Figure 1 Site Location (Note: Sinter Plant at Grid Ref. N23)

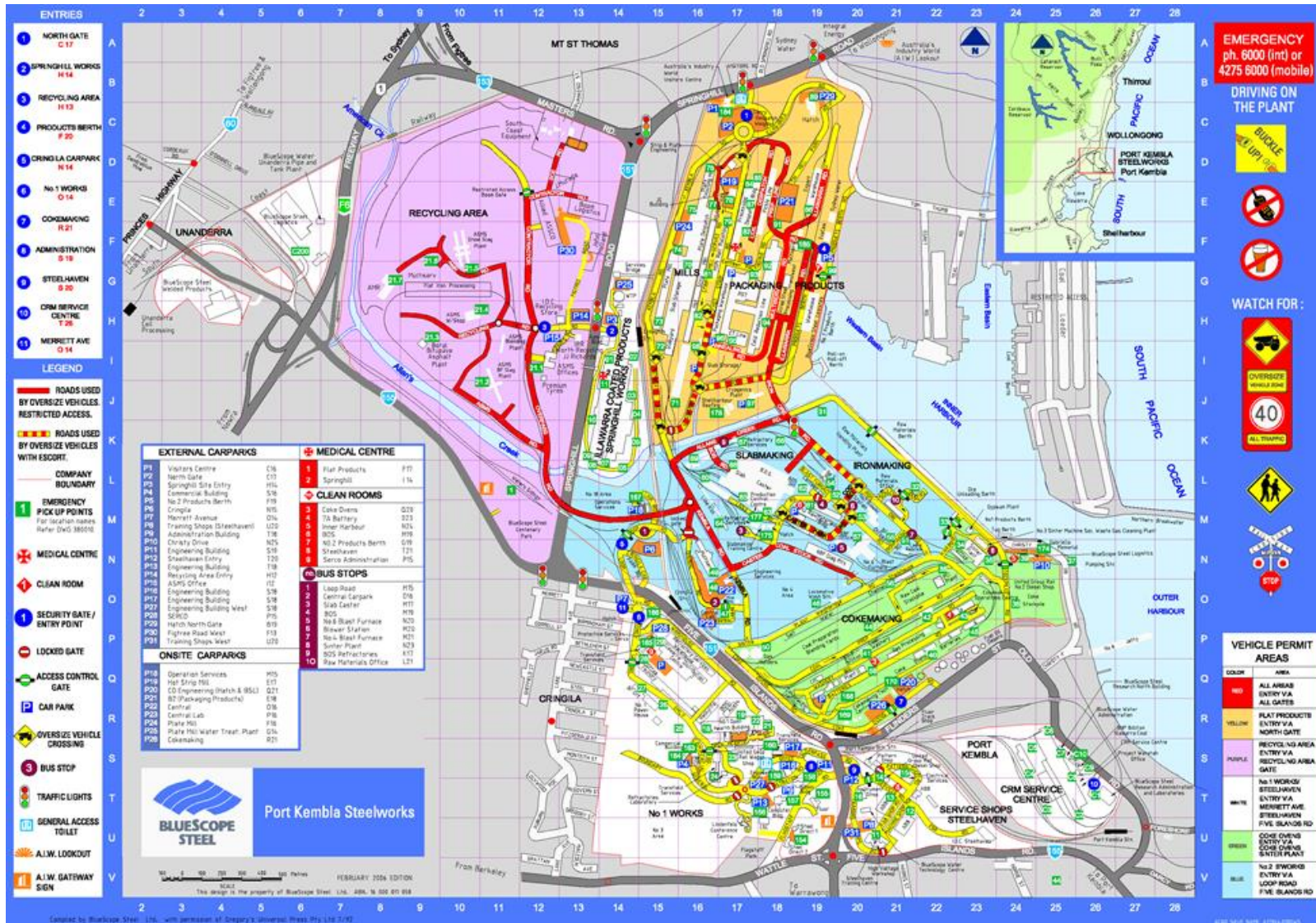
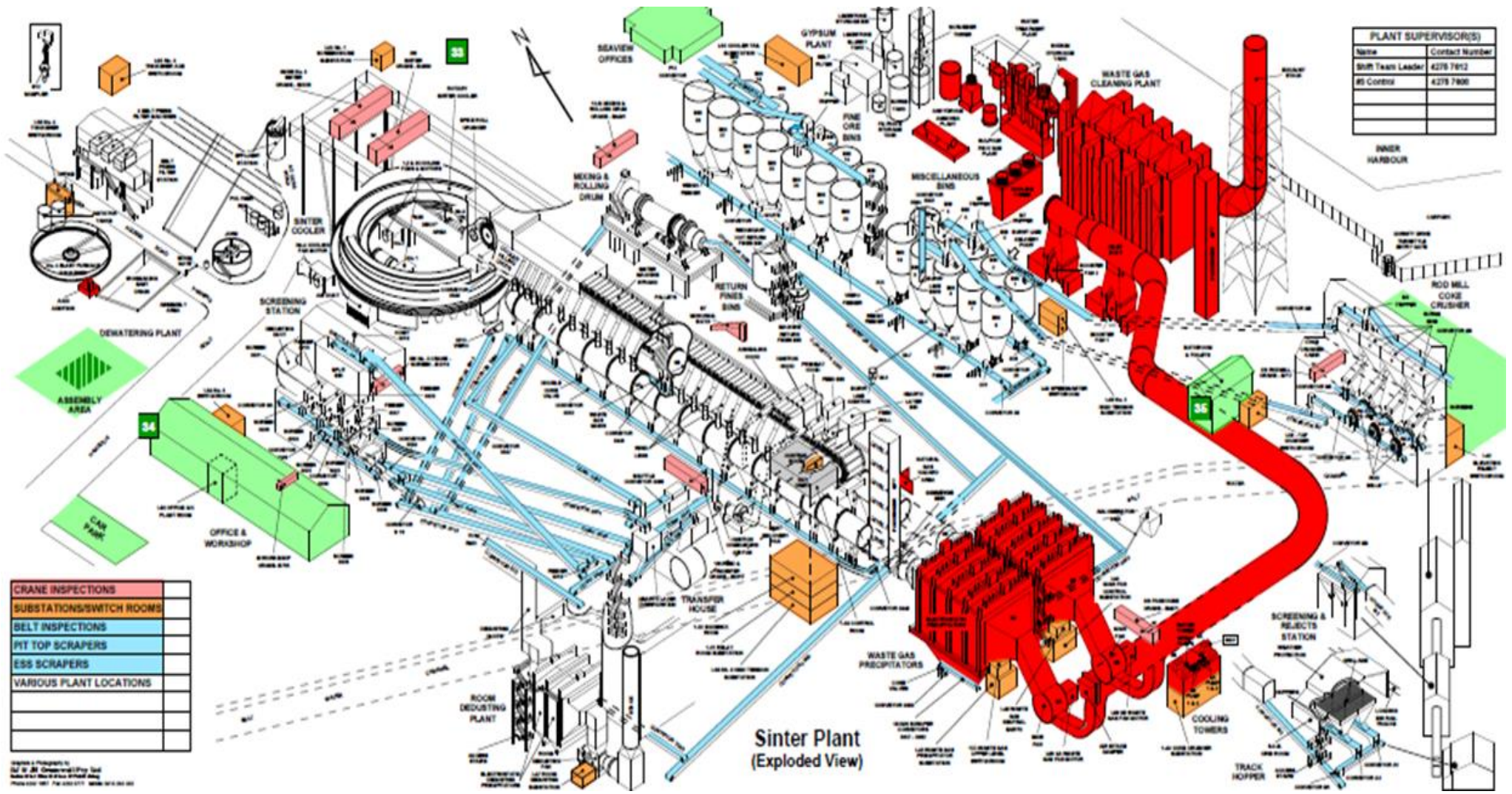


Figure 2 Layout of Sinter Plant (Including WGCP and Gypsum Plant)



3.2 Process Description – Sinter Plant

A brief description of the Sinter Plant process is provided in this section of the report. This process is relatively straightforward and is shown on the process flow diagram for the WGCP (Refer to Figure 3 in Section 3.3). It involves the transfer of raw materials (iron ore, coke breeze, sinter fines and limestone) to a mixing and rolling drum and then to a feed unit on the Sinter Machine. The waste gas from the Sinter Machine passes through electrostatic precipitators before being further treated in the WGCP.

3.2.1 Strand and Ignition Furnace

Granulated iron ore fines are mixed with suitably sized coke and fluxes and ignited under suction on a moving grate. A natural gas fuelled ignition furnace, which was installed as part of the OPUP, ignites the surface of the bed.

The speed of the strand is adjusted to ensure the “burn through point” is at the end of the strand. This is achieved in practice by controlling the temperature of the waste gas into the precipitators within a narrow band.

3.2.2 Electrostatic Precipitators and Sinter Machine Fans

Waste gas is drawn from the sintering process by two sinter machine main fans through two electrostatic precipitators, which remove most of the dust from the waste gas. The main fan vanes control the volume of waste gas to suit the sintering process.

3.2.3 Burnt Lime

Burnt lime is used to increase productivity by improving on-strand permeability. It is delivered by road tanker.

3.2.4 Sinter Machine Room Dedusting System

The Sinter Plant building is equipped with a ventilation system to collect air borne dust. The air drawn from the building is passed through precipitators and then discharged to atmosphere via the Sinter Machine Room Dedusting Stack (EPL Point 2 – Refer to Photograph 3).

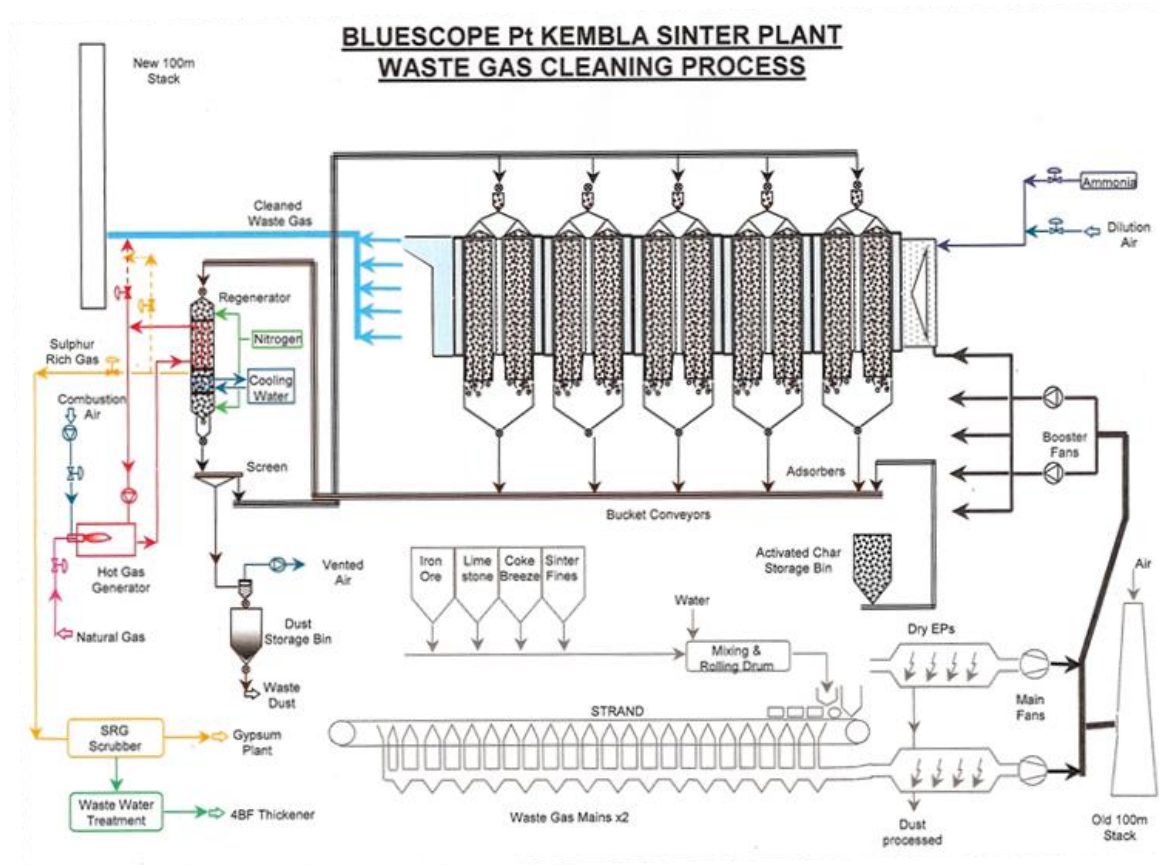
Photograph 3 Sinter Machine Room Dedusting Fan and Stack (1 March 2019)



3.3 Process Description – Waste Gas Cleaning Plant

A brief description of the WGCP process is provided in this section of the report. A process flow diagram is shown in Figure 3.

Figure 3 Simplified Process Flow Diagram for WGCP



3.3.1 Waste Gas Feed to Adsorbers

The inlet gas duct to the WGCP is a 6 m diameter insulated duct that transports the waste gas from the outlet manifold of the main fans to the inlet of the WGCP booster fans. The two booster fans raise the waste gas pressure at the adsorber inlet manifold to overcome the pressure drop of the activated char bed and push the gas through the adsorbers. The waste gas temperature is controlled by the addition of air through a damper.

The adsorber inlet manifold allows even distribution of gas through the adsorbers.

The gas, after passing through the adsorbers, flows into the outlet duct and is carried to the clean gas stack.

3.3.2 Activated Char Bed Adsorbers

There are five (5) char bed adsorbers operating in parallel, with four (4) currently in service. Each adsorber has 3 sequential beds of chars, each moving at a different speed. The SO₂ is adsorbed on the char from the waste gas and dust filtered, and the clean gas is directed to the stack.

Ammonia gas may be injected into the waste gas at the top half of the adsorbers in order to elevate the activity of the char and to remove some nitrogen oxides (NO_x) in the waste gas by their reduction

reactions with ammonia. The NO_x reacts in the presence of the activated char with ammonia (NH_3) to form nitrogen (N_2) and water (H_2O).

Injection of Ammonia gas has been discontinued since the previous IEA in 2016. The effects of this change on NO_x emissions are outlined in Section 4.2.2.

3.3.3 Char Regeneration

After the char has passed through the adsorbers, it is transferred to the regenerator. Within the regenerator, the char passes through the tube side of two shell and tube heat exchangers in series. In the first, a hot gas passing around the outside of the tubes indirectly heats the char. This elevates the char temperature to 400°C , desorbs collected SO_2 and decomposes small quantities of dioxins.

The char is then indirectly cooled in the second heat exchanger to less than 140°C by a closed-circuit cooling system prior to being discharged to the activated char screen.

The char side of the tube of both the heating and cooling sections of the regenerator are purged with nitrogen to assist in SO_2 desorption and flushing, and to prevent air ingress while the char is hot.

The regenerated char is conveyed to the adsorbers, completing the cycle.

3.3.4 Hot Gas Generator

The hot gas required for regeneration is generated by burning natural gas in a combustion chamber and using the hot inert flue gas (mainly CO_2 and N_2) for regeneration.

The hot gas generator is equipped with a fully automated burner management system, programmed with a purge cycle for start-up.

3.3.5 Sulphur Rich Gas Handling

The gas desorbed in the regenerator is referred to as Sulphur Rich Gas (SRG). SRG predominantly contains SO_2 (normally ~7% and potentially up to 16-20%), but contains impurities such as N_2 , CO_2 , hydrogen chloride, hydrogen fluoride, unreacted ammonia (NH_3) and dust. The SRG washing System is designed to wash the desorbed gas using water, thereby cooling it from 420°C , and cleaning it at the same time. The purified SRG is directed to the Gypsum Plant, which was commissioned in 2007 (Refer to Section 3.4).

The SRG handling system consists of a series of scrubber towers and their ancillary equipment such as recirculation pumps, heat exchangers to cool the gas, neutralisation tank for primary waste water treatment, mist precipitator for final dust and liquid removal from SRG, and SRG fan to transport the gas to the Gypsum Plant.

3.3.6 Dust Collection System

The dust collected from the undersize of the active char screen, and from spillage in conveyor casings, is pneumatically transported and is collected and stored in a dust storage bin.

The dust is discharged from the dust storage bin to a specially designed truck for transport to an area for further processing prior to disposal. Approximately 1 truck load of dust is produced each day.

3.3.7 Ammonia System

Injection of Ammonia gas has been discontinued since the previous IEA in 2016 (Also refer to Section 3.3.2); however, the storage and tanker unloading facilities are still present. At the time of the current IEA, the storage tank was not in use and was isolated from the WGCP.

The storage tank is a 25-tonne horizontal pressure vessel with a compressor for unloading of bulk road tankers.

The tank is fenced with authorised access only using a swipe card system.

The tank, compressor and tanker unloading bay are equipped with water spray systems. The water sprays can be activated locally from the Ammonia Emergency Water Station or from the control room.

3.4 Process Description – Gypsum Plant

The Gypsum Plant was designed to remove sulphur dioxide from the Sulphur Rich Gas (SRG). During normal operation, SRG is drawn from a Mist Precipitator to the Gypsum Plant. The SRG enters the Gypsum Plant Scrubber Tower where it is reacted with limestone slurry and recycled filtrate to produce Gypsum (Solid Calcium Sulphate). Any residual gas is drawn from the Gypsum Plant Scrubber Tower by a variable speed SRG Fan and then discharged to the WGCP stack.

Photograph 4 Storage of Gypsum (1 March 2019)



3.5 Services

Natural gas

Natural gas to the sinter machine ignition furnace and hot gas generator is received by pipeline at 1000 kPag and is let down to the required operating pressure by a set of self-regulating valves, designed to gas industry standard.

Nitrogen

Nitrogen is received as a gas from the site nitrogen supply and stored in two receiver vessels (each 90 m³ at 600 kPag) which provide buffer capacity for the WGCP.

There is an extensive array of nitrogen pipework providing nitrogen as the carrier gas for the regenerator, sealing of the regenerator inlet and outlet rotary valves, sealing of the SRG fan, air intake damper operation for the WG, and for emergency inerting of the adsorbers. Nitrogen gas is also supplied as required to the AC storage bin, dust storage bin, hot gas generator purge cycle, SRG washing facility inlet purge, and the ammonia supply facility and loading area.

Compressed Air

Compressed air is supplied via pipe line and may be used as a power supply for pneumatic hand tools in various areas. It is not directly used in the process.

Instrument Air

Compressed air is supplied via pipeline, is dehumidified by air dryers, and then used as instrument air. Instrument air is stored in a dedicated receiver (90m³ at 600 kPag). The instrument air is used to operate all the pneumatically actuated equipment (valves, dampers) around the plant.

Potable Water

Potable water is supplied via pipeline and is used for drinking fountains, safety showers and eye wash stations.

Industrial Water

Industrial water is supplied via pipe line and is mainly used for regenerator cooling water makeup (after demineralisation), water seals around the plant, ancillaries cooling water makeup, water supply for the ammonia scrubber sprays and makeup to the scrubber basin, water sprays to suppress ammonia dispersion from accidental leaks, make up water for SRG quench vessel, flushing for pump seals etc.

The supply is connected to the rest of the industrial water system via a Reduced Pressure Zone (RPZ) Valve that prevents backflow and contamination of the upstream supply.

Industrial water is also used for general and fire services.

3.6 Control Room

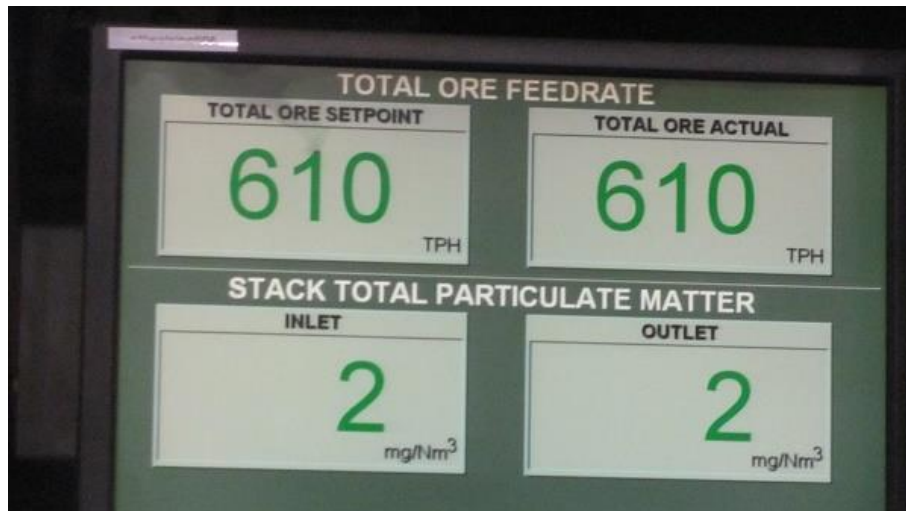
The Sinter Plant (Including the WGCP and Gypsum Plant) is controlled from the Sinter Plant control room, located at the strand level in the Sinter Plant building. The control room is normally occupied at all times by a process operator.

Historical trend data for process variables is available on screen (and from electronic archive) to assist in plant performance analysis. A log of all alarms, trips, set point changes or keystroke entries is maintained in electronic form for use in incident analysis.

Audible alarms are generated by the PLC in the control room, to warn the operator of high or low process parameter values, so corrective actions can be taken. Valve open / close positions of essential valves are also indicated on the screen.

The readings from the continuous total particulate monitoring device on the WGCP stack are also displayed in the control room (Refer to Photograph 5).

Photograph 5 Display of Stack Total Particulate Matter (1 March 2019)



3.7 Materials and Quantities

The maximum storage quantities of Dangerous Goods (DGs) for the Sinter Plant are shown in Table 5. These depots are primarily associated with the WGCP.

Table 5 Storage of Dangerous Goods at Sinter Plant

Depot	Type	DG Class	Material	Max. Capacity
BF6	A/G Tank	8	Hydrochloric Acid	13,500 litres
BF7	A/G Tank	8	Sodium Hydroxide	25,000 litres
BF8	A/G Tank	2.3	Anhydrous Ammonia	25,000 kg *
	2 x A/G Tanks	2.2	Nitrogen	90 m ³ per tank (600 kPag)

* Injection of Ammonia gas has been discontinued since the previous IEA in 2016 (Refer to Section 3.3.7); however, the storage and tanker unloading facilities are still present.

3.8 Staffing

The Sinter Plant (Including WGCP and Gypsum Plant) operates 24 hours per day, 365 days per year. The management, operations leadership and plant inspection and maintenance are all part of the Sinter Plant as a whole. Operators work on a 12-hour rotating shift roster.

Staffing level during normal operations includes:

- Operations Manager;
- Operations Crew (each with a Shift Team Leader);
- Instrument/ Electrical fitter;
- Asset Strategy Engineer;
- Maintenance personnel;
- Senior Process Engineer; and
- Operations Engineers.

4 AUDIT FINDINGS

4.1 Environmental Management

4.1.1 Environmental Management System

Health, Safety and Environmental (HSE) management is governed at BSL in accordance with the following hierarchy of documentation:

1. Bond.
2. Health, Safety, Environment and Community (HSEC) Policy.
3. Safety Beliefs and Environmental Principles.
4. HSE Standards.
5. Corporate Policies, Procedures, Codes of Practice and Guidelines.
6. Business and Sub-Business Policies, Procedures, Codes of Practice and Guidelines.

BSL operates with fourteen corporate health, safety and environment standards. The stated objectives of the HSE standards are to:

- Support BlueScope Steel's Bond, HSEC Policy, Safety Beliefs and Environmental Principles;
- Set expectations for progressive development and implementation of HSE policies, processes and procedures;
- Drive continual improvement.

There are 14 standards:

- | | |
|--|--|
| 1. Leadership and Accountability | 8. Material Supply and Contractor Management |
| 2. Legal and Other Requirements | 9. Project Management |
| 3. Risk Management (Note: Includes management of change) | 10. Process, Plant and Equipment integrity |
| 4. Fit for Work | 11. Emergency Preparedness and Response |
| 5. Training and Competency | 12. Incident Management |
| 6. Engagement, Consultation and Communication | 13. Preventive and Corrective Action |
| 7. Document and Record Control | 14. Measurement and Verification |

Prior to 2018, the BlueScope Australia and New Zealand (BANZ) business segment included two sub-business segments: Australian Steel Products (ASP) and New Zealand & Pacific Steel (NZPac). The overarching BANZ business segment was removed in early 2018 and ASP and NZPac are now separate business segments rather than sub-business segments under BANZ. The Port Kembla Steelworks (PKSW) has remained part of ASP.

For the Port Kembla Steelworks (PKSW), 'Business and Sub-Business Policies, Procedures, Codes of Practice and Guidelines' are managed through the 'BANZ SEQ System' (Note: SEQ = 'Safety, Environment and Quality') and are accessed on the local intranet.

BSL's EMS is certified to ISO 14001.

4.1.2 Environmental Aspects and Impacts

BSL has identified the following environmental aspects and impacts (*Ore Preparation LAWWNE Aspects Register*, DS.DH-IM-ADM-05.03, Rev. 5, dated February 2017, copy provided):

Table 6 Environmental Aspects and Impacts for Sinter Plant

Aspect	Impact/s
LAND	
General maintenance waste	Waste materials to landfill
Spills	Contaminated soils from spillages of fuels, lubricants, hydraulic oils and chemicals
AIR	
Stockpiles, stacking, material blending and transport of material (including conveyor transfer & trucking)	Fugitive dusts
WGCP stack (EPL Pt 107)	Discharge of fine particulates & emissions of dioxins, NO _x , SO _x and CO ₂
Room dedusting stack (EPL Pt 2)	Dust emissions from stack
Cooler	Sinter plant dust generation
Anhydrous ammonia	Localised air emission
Monitoring devices	Failure to maintain or calibrate monitoring devices
WASTE	
WGCP dust	Waste dust contains fine activated char and captured Sinter Plant waste gas dust contains heavy metals (EPA classified immobilised solid)
Asbestos	Hazardous waste during and after maintenance
WATER	
Stormwater and surface run off	Contamination of harbour
Anhydrous ammonia	Liquid ammonia leak to drain
Water treatment plant reject slurry	Solids containing component of SRG washing liquid
Water treatment plant discharge	SRG washing liquid after treatment discharged to 4BF Thickener
Main fan cooling towers	Legionella bacteria
Ancillaries cooling tower	Legionella bacteria
NOISE	
Local noise	Local noise to surrounding area
ENERGY	
Electricity consumption	Greenhouse gases from electricity generation

4.1.3 Environmental Management Plans and Post Approval Documentation

There is no standalone (Environmental Management Plan) EMP for the WGCP or the OPUP. The required information is included in various documents (handbooks, procedures, etc.) as part of the EMS, which is certified to ISO 14001 (Refer to Section 4.1.1).

4.2 Environmental Performance

4.2.1 Environment Related Incidents and Complaints

The IEA included a review of environment related incidents, self-reports and complaints reported for the Sinter Plant (Including the WGCP and Gypsum Plant) during the period March 2016 to February 2019.

BSL recorded the following for the Sinter Plant (Including the WGCP and Gypsum Plant):

- Nineteen self-reports to the EPA to notify that the SRG treatment system / Gypsum Plant is off-line. This is a condition of the EPL (Licence Condition No. O4.18) since it will result in a discharge of SRG to atmosphere.
- No complaints from members of the public (e.g. due to noise, odours, dust emissions, etc.) other than one report of a visible emission from the WGCP stack. This complaint was initially received by the EPA, who then advised BSL. The complaint is recorded in the BSL system (No. C1258676, dated 1-Dec-17, copy provided) and was also reported in the Community Consultative Committee minutes for 22-Mar-18. BSL's investigation revealed that the Continuous Emission Monitor (CEM) measurement was 3-5 mg/m³, which is less than limit in the EPL (20 mg/m³).
- No self-reports to the EPA regarding visible emissions from the Sinter Plant WGCP Stack (EPL Point 107) or the Sinter Machine Room Dedusting stack (EPL Point 2).
- One self-report to EPA to advise that a minor quantity of Neutralised Spent Pickle Liquor was discharged into the Ironmaking East Drain (May 2016). Note: This was not directly related to the OPUP, WGCP or Gypsum Plant.
- Two non-compliances relating to exceedances of limits from the EPL: exceedance of the wet weather iron limit at the IMED on 7-Jul-16; and, exceedance of the solid particulates limit at the No. 3 Sinter Machine Stack (EPL Pt 151) on 23-May-18. These two non-compliances are included in the Annual Returns to the EPA and are described further below. BSL appears to have implemented measures to mitigate such incidents.

BSL recorded the following information for the exceedance of the wet weather iron limit (measured 50 mg/l against limit of 20 mg/l) at the IMED (MARS incident no. i1017747, date closed 28-Dec-16, copy provided):

- Unblocking two stormwater drains which run into a common pipe directly in front of the shipping office block resulted in increasing stormwater flows into these drains, which then discharge into the IMED. The liquid discharged into the IMED contained elevated iron solids.

- Investigations were undertaken at Ore Preparation to rule out other potential contributing factors to the Total Iron exceedance. The following was determined: a) There were no industrial cleaning activities being conducted at Ore Preparation that could have resulted in liquid discharges into the IMED; b) There were no process-related incidents reported at Ore Preparation that could have resulted in liquid discharges into the IMED; and c) A review of Spent Pickle Liquor water quality discharges from No.4 Thickener overflows into the IMED were below EPA Licence concentration limits.
- The stormwater pipework has been blocked to prevent direct stormwater flow into the IMED.

The IMED diversion project, which has been completed since this incident occurred, is expected to mitigate the potential for environmental impacts from similar events (Refer to Section 4.2.2).

BSL recorded the following information for the exceedance of the solid particulates limit (measured 25 and 28 mg/m³ against limit of 20 mg/m³) at the No. 3 Sinter Machine Stack (EPL Pt 151) (MARS incident no. i1341316, date closed 5-Dec-18, copy provided):

- The non-compliant samples were taken after the Sinter Plant had been put into bypass mode on the 23-May-18. A relocated Continuous Emission Monitor (CEM) had been installed and calibrated in the same way as the most recent bypass set up in 2014; however, operating conditions were different on this occasion, which led to a calibration error on the CEM and a subsequent delay in detecting the elevated levels of solid particles.
- The Sinter Plant was stopped to recalibrate the CEM and conduct engineering tests. Recertification work was carried out on a flap valve and operational parameters adjusted to ensure operation in accordance with the licence limits.
- The Ore Preparation Operations Department has updated the bypass procedure to require that multiple engineering tests are carried out from start-up of the bypass. Data from these tests will be used to calibrate the CEM.
- A new CEM has been installed on the outlet of the electrostatic precipitators at the 3A Sinter Machine Fan (Refer to Section 3.2.2). BSL was still in the process of calibrating this CEM at the time of the IEA. BSL advised that another CEM is planned at the 3B Sinter Machine Fan. A CEM will not need to be relocated during bypass mode once the two new CEMs are fully commissioned.

4.2.2 Predicted and Actual Environmental Impacts

Three changes were identified during the IEA with the potential to affect the environmental impacts of the Sinter Plant (Including WGCP and Gypsum Plant) since the previous IEA:

- Discontinuation of Ammonia Gas Injection;
- Completion of the IMED Drainage Diversion Project (PRP 176); and
- Re-Use of 'Activated Char Undersized' (ACU).

These were not considered to affect the physical extent of the development in comparison with the approved boundary and their potential impacts are described below.

Discontinuation of Ammonia Gas Injection

Ammonia gas was previously injected into the waste gas at the top half of the adsorbers in order to elevate the activity of the char and to remove some nitrogen oxides (NO_x) in the waste gas by their

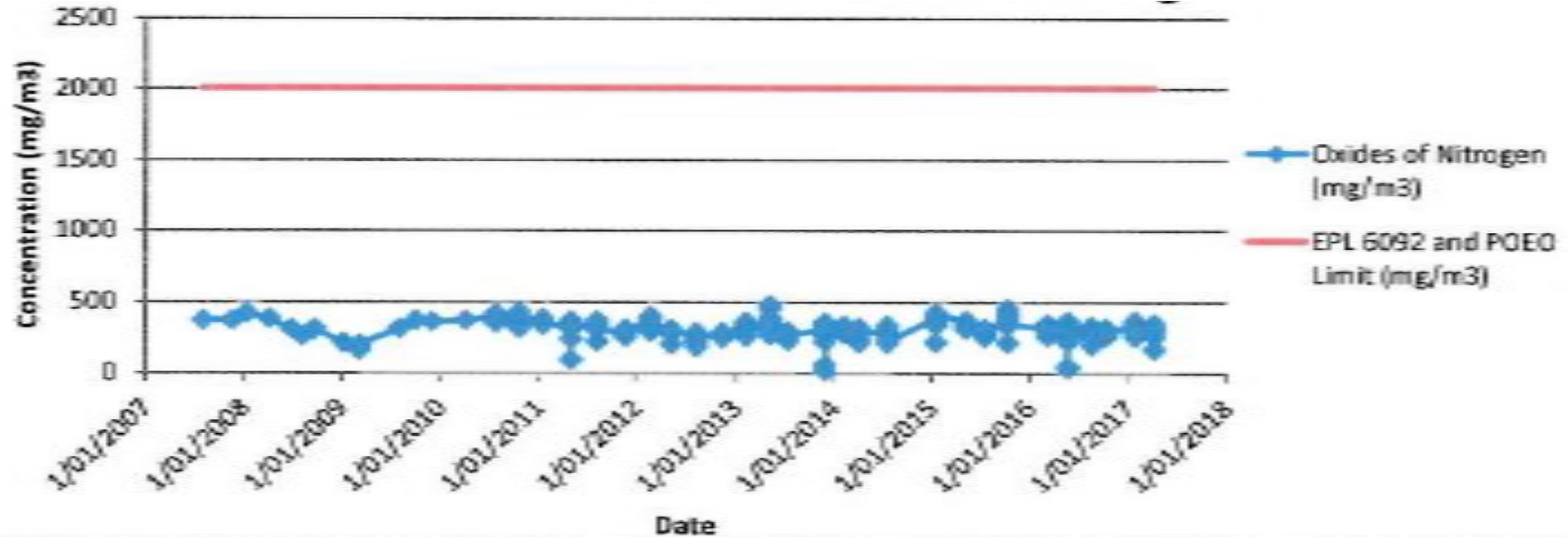
reduction reactions with ammonia (The NO_x reacts in the presence of the activated char with ammonia (NH_3) to form nitrogen (N_2) and water (H_2O). The injection of Ammonia gas has been discontinued since the previous IEA in 2016.

The following is reported in BSL's status report for the WGCP (Excel spreadsheet, dated Jan 2019, copy provided), which is provided to the EPA:

Update Date	Update
1/12/2017	Ammonia Injection. BSL plan to assess requirement.
17/09/2018	BSL plans to decommission Ammonia Injection equipment before December 2018.
17/09/2018	Before final decision to decommission, BSL will provide information on potential effects on char performance and stack emissions.
30/10/2018	Draft report for char usage to be delivered to RL by 2/11/18 for review, draft stack emission impact will be available by next update.
20/11/2018	Reports on char usage and de- NO_x performance associated with ammonia injection have been delivered to RL. Document being prepared for communication - to be discussed at liaison meeting 22/11/18.
18/12/2018	Ammonia system purged and isolated, maintenance plans and further mothballing to be reviewed this week. Formal notification of decommissioning of the plant to be provided at next update.
15/01/2019	Ammonia offline - mothballing process proceeding. More information to follow before the end of January.

Discontinuing Ammonia injection does not appear to have affected NO_x emissions from the WGCP stack (Refer to Figure 4, which shows the recorded monitoring results from January 2007 to March 2019). This change will also potentially reduce localised Ammonia emissions (e.g. during tanker unloading).

Figure 4 NOx Monitoring Results for WGCP Stack (EPL Pt 107)



IMED Drainage Diversion Project (PRP 176)

The IMED Drainage Diversion Project (PRP 176) has been completed since the previous IEA in 2016. As a result, the IMED does not normally discharge directly to the harbour under dry weather conditions. The weir on the IMED was also increased following a ‘king tide’ event in Jan – Feb 2017. Since raising of the weir, there has been no reported discharge from the IMED directly into the harbour.

Re-Use of ‘Activated Char Undersized’ (ACU)

Recycling of ACU is still under investigation and two trials have been completed since the previous IEA in 2016. Whilst this is expected to reduce dust emissions from the ACU stockpile located in the BSL Alliance and Recycling area once all stockpiled material is recycled, the potential for cycling up of some trace contaminant (e.g. Hg) is still being evaluated by BSL.

4.3 Compliance Performance

4.3.1 Agency Notices, Orders, Penalty Notices or Prosecutions

The NSW EPA issued one Penalty Notice (Notice No: 3085780794, Issue date: 10 January 2017) for the PKSW since the previous IEA in 2016. This is reported in the 2017 annual return as a non-compliance against condition L3.3 of the EPL.

The penalty notice related to exceedance of the cyanide limit due to a seal pot overflow to the Slab Mill Drain with a minor fish kill. The cyanide limit exceedance is not associated with the Sinter Plant (including WGCP and Gypsum Plant).

4.3.2 Compliance Summary

The compliance status for each relevant requirement was assessed in accordance with the criteria from the NSW Government’s *Independent Audit, Post-Approval Requirements* [Ref. 8]. The number of findings in each category is listed in the following table:

Table 7 Compliance Summary

Compliance Assessment Category	Number of Findings									
	Conditions of Development Consent							Add. EPL Conditions	Site Inspection (Add.)	Total
	Part A	Part B	Part C	Part D	Part E	Part F	Part G			
Compliant	18	5	7	2	33	0	12	29	0	106
Non-Compliant	0	1	0	0	9	0	2	6	0	18
Not Triggered	1	0	0	0	1	0	3	2	0	7
Observation	0	0	0	0	0	0	0	0	0	0
Note	0	0	0	0	0	0	0	0	0	0
Total	19	6	7	2	43	0	17	37	0	131

4.3.3 Identified Non-Compliances

Due to duplication of some requirements (i.e. Very similar Consent Conditions are included for the three projects), the number of equivalent Non-Compliances is actually lower than reported in Section 4.3.2 (Table 7). The equivalent number of Non-Compliances is eight (8), as shown in Table 8.

Note: The recommended actions for each of the following non-compliances are included in the Audit Tables (Refer to Appendix B) and are listed in Section 5.1.

Table 8 Identified Non-Compliances

ID No/s.	Description of Non-Compliance	Recommended Action #
NC 2019/1	<p>It is not clear if all documents constituting the EMP were made publicly available (e.g. during the construction / commissioning phases) and it does not appear to be included on the current website (The information on the current website appears to be for the OPUP only).</p> <p>(Refer to CC # W-3.3).</p>	2019/1
NC 2019/2	<p>To comply with CC # W-4.11, the Waste Gas Cleaning Plant must be designed and operated so that there should be no visible emissions from the Waste Gas Cleaning Plant exhaust stack under normal operations. Condition number O4.16 from the EPL is similar to CC # W-4.11 but adds a 20 mg/Nm³ criterion for particulate matter to enable an assessment of 'visibility'.</p> <p>It is noted that compliance with the 20 mg/Nm³ criterion from the EPL does not necessarily mean that the emissions from the WGCP stack are not visible. Actions were included in the 2013 and 2016 IEAs to investigate and resolve this apparent inconsistency but do not appear to have been closed and a visible emission has been reported since the previous IEA in 2016. Therefore, this has been assessed as a 'Non-Compliance' with W-4.11, despite being 'Compliant' with EPL # O4.16.</p> <p>(Refer to CC # W-4.11).</p>	2019/2
NC 2019/3	<p>This condition has been assessed as 'Non-Compliant' due to the exceedance of the limit for solid particles at Point 151 (No. 3 Sinter Machine Stack). A recommendation has not been included as no further exceedances have been recorded and BSL is currently installing new Continuous Emission Monitors (CEMs) (Refer to Section 4.2.2).</p> <p>(Refer to CC #s W-4.13 & O-2.6, EPL # E5.4 & E5.5, EPL # E5.8).</p>	-
NC 2019/4	<p>During the site inspection on 1 March 2019, the Sinter Plant was observed to be maintained in a manner that minimises dust generation. However, the roadway area near the offices at the Sinter Plant was observed to be in a similar condition during the previous IEA in 2016 (Refer to Section 4.3.5). This area is shielded by the Sinter Plant building (i.e. is less likely to be a source of an off-site dust emission); however, it should still be routinely swept.</p> <p>(Refer to CC # O-2.2, EPL # O3.2).</p>	2019/3

ID No/s.	Description of Non-Compliance	Recommended Action #
NC 2019/4	<p>There was an exceedance of the limit for total iron at EPL Point 89 (IMED) since the previous IEA in 2016 (Refer to Section 4.2.1).</p> <p>A recommendation has not been included as no further exceedances have been recorded since July 2016 and the subsequent completion of the IMED Drainage Diversion Project (PRP 176) is expected to mitigate similar incidents (Refer to Section 4.2.2).</p> <p>(Refer to CC # W-4.30, CC # W-4.31, CC # O2.12, EPL # L3.5).</p>	-
NC 2019/5	<p>BSL should ensure compliance with the transport routes set out in the SEE or seek approval to use alternative routes.</p> <p>(Refer to CC # W-4.45, CC # W-4.46).</p>	2019/4
NC 2019/6	<p>It is unclear whether the restriction on parking along Christy Drive was only intended to apply during the construction phase (when many more vehicles would be present) or whether this was meant to be an ongoing restriction. This should be raised with the DP&E and resolved accordingly.</p> <p>(Refer to CC # W-4.47).</p>	2019/5
NC 2019/7	<p>It is noted in the acceptance letter from the DP&E for the previous IEA (letter dated 5-Aug-16, copy provided) that the report was submitted to the Department on 16 June 2016, which was not within 2 months of the first day of the site visit (8-10 and 24 March 2016). This was noted as being non-compliant with this CC. No action was proposed by the DP&E.</p> <p>(Refer to CC # W-7.7, C # O-4.2).</p>	-
NC 2019/8	<p>BSL has self-reported (as a non-compliance in the Annual Returns) that some air monitoring analysis is not fully compliant with EPA approved methods. This is understood to relate to the existing platform at the Sinter Plant Room Dedusting Stack (EPL Pt 2). This platform only allows access to 2 out of 4 sampling ports as it does not go around the whole stack. Therefore, this condition has been categorised as 'Non-Compliant' (Also refer to EPL # M3.1). A recommended action has not been included since it is reported on the EPA website for EPL No. 6092 that the EPA has already "requested additional information to progress BSL application to modify sampling methods".</p> <p>(Refer to EPL # M2.1 & M2.2, EPL # M3.1).</p>	-

4.3.4 Status of Actions from Previous Annual Review and Compliance Reports

The actions from the most recent triennial review were from the previous IEA (Refer to Section 4.3.5).

4.3.5 Status of Actions from Previous Independent Environmental Audits


The status of each corrective action and observation identified the previous independent environmental audits was reviewed with BSL and a summary is included in the following table. If a relevant action from the previous audit had not been adequately implemented, then an additional action was included in the current audit report (as shown in the 'Recommended Action/s' column).

Table 9 Status of Actions from Previous Independent Environmental Audits


Prior Audit ID #	Action	Findings	Status	Recommended Action/s
2016/1	BSL should locate the construction certificate for the WGCP and to ensure it is available for future reference.	BSL has now located the construction certificates for the WGCP (DA 26-02-01) and the following copies were provided during the IEA: <ul style="list-style-type: none"> • Certificate No. 125/01 (dated 10-Sep-01) for piling and foundations for the main plant [1st construction certificate]. • Certificate No. 185/01 (dated 10-Dec-01) for construction of the waste gas duct between the Sinter Plant and the WGCP [2nd construction certificate]. • Certificate No. 65/02 (21-Mar-02) for construction of the main plant [3rd construction certificate]. • Certificate No. 288/02 (dated 6-Nov-02) for construction of the WGCP stack [4th construction certificate]. • Certificate No. 289/02 (dated 6-Nov-02) for construction of ancillary plant (SRG and ammonia) [5th construction certificate]. • Certificate No. 23/03 (dated 31-Jan-03) for construction of the water treatment plant and ancillary cooling tower area [6th construction certificate]. • Certificate No. 65/06 (20-Feb-06) for piling and civil works for the gypsum plant [7th construction certificate]. 	CLOSED	
2016/2	BSL should locate the occupation certificate for the WGCP and to ensure it is available for future reference.	BSL has now located the interim and final occupation certificates for the WGCP (DA 26-02-01) and copies were provided during the IEA (Certificate No. 66/03, dated 6-May-03 and Certificate No. 18/05, dated 19-Jan-05).	CLOSED	

Prior Audit ID #	Action	Findings	Status	Recommended Action/s
2016/3	BSL should locate the relevant compliance certificates for construction of the WGCP and ensure these are available for future reference.	<p>Evidence of appointing a Principal Certifying Authority and notifying Council and the Department of their intention to commence construction could not be located during the previous IEA in 2016.</p> <p>BSL has now located the letter sent to the Department appointing the Principal Certifying Authority (Letter dated 23-Jul-01, copy provided).</p> <p>A letter notifying Council and the Department of their intention to commence construction could not be located. This relates to a pre-construction phase of the development (i.e. out of scope of the current IEA); however, this action has been marked as 'Closed' since evidence was provided of submitting the first construction certificate (Letter to Council and Department for Certificate No. 125/01, dated 10-Sep-01, copy provided) and the pre-construction compliance report (Letter to Council and Department dated 11-Sep-01, copy provided).</p>	CLOSED	
2016/4	BSL should locate the wind load design records for the WGCP and ensure these are available for future reference.	<p>Design records could not be located during the previous IEA in 2016; however, an engineering certification from Sumitomo Heavy Industries was provided for the current IEA (dated 15-Feb-02). It is reported in this document that:</p> <p><i>All design loads for the structural design was determined in accordance with the following standards.</i></p> <p><i>AS 1170.1 Dead and live loads</i></p> <p><i>AS 1170.2 wind loads</i></p> <p><i>AS 1170.4 Earthquake loads</i></p> <p>The design of the foundations was certified against AS 1170 by Woolacotts Consulting Engineers (Letter dated 19-Sep-02, copy provided).</p>	CLOSED	
2016/5	Information relating to the WGCP should be made publicly available (e.g. on a public website) as required by the relevant condition of development consent (Refer to CC # W-3.3).	<p>The Environmental Management Plan (EMP) does not appear to be included on the current website (The information on the current website appears to be for the OPUP only).</p>	OPEN	Refer to 2019/1.

Prior Audit ID #	Action	Findings	Status	Recommended Action/s
2016/6	Information relating to the OPUP should be made publicly available (e.g. on a public website) as required by the relevant condition of development consent (Refer to CC # O-5.4).	<p>It is reported in the acceptance letter from the DP&E for previous IEA (letter dated 5-Aug-16, copy provided) that: "A review of the BlueScope Steel website could not locate the documents as required by Condition 5.4 of PA 06_0229 MOD1. It is requested that the documents as required by this condition are uploaded to the website by 30 August 2016, with a link being provided by email to the Department confirming that this has been completed". The letter from BSL to DP&E (dated 24-Aug-18) was provided to confirm that information was uploaded to the website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/) by the due date.</p> <p>The information uploaded appears to address items (a), (b) and (d). Item (c) does not appear to have been specifically addressed. However, unlike the WGCP (Refer to CC # W-3.2) there is no requirement for a standalone EMP for OPUP (Refer to CC # O-6.3) and the plans referred to in the CCs for OPUP appear to be generally applicable to the construction phase (e.g. Construction Environmental Management Plan – Refer to CC #s O-6.1 and O-6.2) . Consultation is also being provided through the Community Consultative Committee (Minutes are available at: http://bsi-illawarraweb-prod.elasticbeanstalk.com/community/community-consultative-committee/). Therefore, this has been assessed as 'Closed'.</p>	CLOSED	

Prior Audit ID #	Action	Findings	Status	Recommended Action/s
2016/7	The telephone number and postal address for receiving complaints should be displayed near the entrance to the site, in a position visible from the nearest public road.	<p>A notice is now displayed near the entrance on Christy Drive (Refer to Photograph 6).</p> <p style="text-align: center;">Photograph 6 Sign Near Entrance on Christy Drive</p> 	CLOSED	
2016/8	The roadway between the Sinter Plant offices and the Sinter Plant building should be routinely swept to minimise the generation of windblown and traffic generated dust.	The roadway between the Sinter Plant offices and the Sinter Plant building did not appear to have been recently swept.	OPEN	Refer to 2019/3.

Prior Audit ID #	Action	Findings	Status	Recommended Action/s
2016/9	BSL should ensure compliance with the transport routes set out in the SEE for: (i) chemicals transported to the site (CC # W-4.45); and (ii) non-liquid waste from the site (CC # 4.46). Alternatively, BSL should seek approval for alternative routes to be followed.	This action is still open (Refer to CC # W-4.46).	OPEN	Refer to 2019/4.
2016/10	It was observed during the site visit that some vehicles were being parked near the gate on Christy Drive. This would appear to be non-compliant with CC # W-4.47; however, it is not clear if this restriction was only intended to apply during the construction phase (when many more vehicles would be present) or whether this was meant to be an ongoing restriction. This should be raised with the DP&E and resolved accordingly.	Vehicles are still parked near the gate on Christy Drive. This recommendation does not appear to have been raised with the DP&E and resolved accordingly.	OPEN	Refer to 2019/5.
2016/11	BSL should ensure debris near the drain at the Gypsum storage area is routinely maintained (or investigate alternative solutions to limit discharge of debris to the drainage system).	Some debris was observed near a drain at the Gypsum storage area during the previous IEA in 2016. This area was observed to be significantly cleaner during the site inspection on 1 March 2019. Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED diversion project should significantly reduce the likelihood of any particulates or debris being discharged off-site (Refer to Section 4.2.2).	CLOSED	

Prior Audit ID #	Action	Findings	Status	Recommended Action/s
2016/12	BSL should inspect all bags of spent char stored on site. Any leaking bags should be repacked / repaired to ensure spent char is not discharged to the site drainage system.	<p>During the previous IEA in 2016, some bags of spent char were observed to be damaged on the roadway near the Gypsum Plant. No bags of spent char were observed to be stored on site during the site inspection on 1 March 2019.</p> <p>Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED diversion project should significantly reduce the likelihood of any particulates or debris being discharged off-site (Refer to Section 4.2.2).</p>	CLOSED	
2016/13	The leaking valve at the Gypsum Plant should be repaired.	The valve observed to be leaking at the Gypsum Plant during the previous IEA in 2016 was again sighted during the site inspection on 1 March 2019. This valve was observed to be not leaking.	CLOSED	
2016/14	The alkaline liquid in the bund at the Waste Water Plant should be removed as soon as practicable.	<p>The liquid in the bund at the Waste Water Plant, as observed during the previous IEA in 2016, was observed to have been removed during the site inspection on 1 March 2019 (Refer to Photograph 7).</p> <p style="text-align: center;">Photograph 7 Waste Water Plant (1 March 2019)</p> 	CLOSED	

Prior Audit ID #	Action	Findings	Status	Recommended Action/s
2016/15	BSL should ensure sandbags used to limit discharge of particulates to the drains are routinely maintained (or investigate alternative solutions to limit discharge of particulates to the drainage system).	<p>Some damaged sand bags were observed near a drain during the previous IEA in 2016. No damaged sand bags were observed during the site inspection on 1 March 2019.</p> <p>Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED diversion project should significantly reduce the likelihood of any particulates being discharged off-site (Refer to Section 4.2.2).</p>	CLOSED	
2016/16	Emissions from the WGCP may be visible despite complying with the relevant condition from the EPL for the WGCP Stack (EPL Point 107). Consequently, the operation of the WGCP Stack (EPL Point 107) may be non-compliant with Consent Condition No. 4.11 for the WGCP, despite being compliant with EPL Condition No. O4.17. This inconsistency should be resolved with the DP&E and EPA (e.g. by amending the relevant conditions).	<p>Note: This action refers to CC # W-4.11 and was raised because it was noted that emissions may be visible despite complying with the equivalent condition from the EPL for the WGCP Stack (EPL Point 107). The relevant condition from the EPL (Condition No. O4.16) is as follows:</p> <p><i>The WGCP must be operated so that there are no visible emissions from the exhaust stack (Discharge Point 107) under normal operations. Compliance with this requirement is to be assessed against compliance with the EPL limit condition for Discharge Point 107 of 20 mg/Nm³ for particulate matter.</i></p> <p><i>Note: Normal operation excludes the first two hours of operation following start up.</i></p> <p>There has been only one report of a visible emission from the WGCP stack since the previous IEA in 2016. This complaint was initially received by the EPA, who then advised BSL. The complaint is recorded in the BSL system (No. C1258676, dated 1-Dec-17, copy provided) and was also reported in the Community Consultative Committee minutes for 22-Mar-18. BSL's investigation revealed that the Continuous Emission Monitor (CEM) measurement was 3-5 mg/Nm³, which is less than limit in the EPL (20 mg/Nm³).</p> <p>This apparent inconsistency does not appear to have been resolved with the DP&E / EPA.</p>	OPEN	Refer to 2019/2.

Prior Audit ID #	Action	Findings	Status	Recommended Action/s
2016/17	The No. 3 Sinter Machine Stack (EPL Pt 3) should be included in the Environmental Aspects and Impacts Register / MARS for the Sinter Plant.	<p>The copy of the Ore Preparation LAWWNE Aspects Register provided during the audit (DS.DH-IM-ADM-05.03, Rev. 5, dated February 2017, copy provided – Refer to Section 4.1.2) does not include the No. 3 Sinter Machine Stack (i.e. to indicate the potential for emissions during bypass of the Sinter Plant Waste Gas Cleaning Plant).</p> <p>Note: There was a typographical error in action reported in the previous IEA. The 'No. 3 Sinter Machine Stack' is EPL Pt 151 not EPL Pt 3.</p>	OPEN	2019/7 – The No. 3 Sinter Machine Stack (EPL Pt 151) should be included in the Environmental Aspects and Impacts Register / MARS for the Sinter Plant (i.e. to indicate the potential for emissions during bypass of the Sinter Plant Waste Gas Cleaning Plant).

4.4 Overall Findings

The overall findings of the IEA may be summarised as follows:

Environmental Management

- Overall, BSL's Environmental Management System (Refer to Section 4.1.1) and management plans (Refer to Section 4.1.3) appear to be adequate for the identified environmental aspects and potential impacts (Refer to Section 4.1.2).

Environmental Performance

- The overall environmental performance for the Sinter Machine Emission Reduction Project (WGCP), Gypsum Plant and OPUP is good, which is evidenced by the:
 - Recording of no complaints, other than one regarding a visible emission from the WGCP stack, for the Sinter Machine Emission Reduction Project (WGCP), Gypsum Plant and OPUP since the previous IEA in 2016 (Refer to Section 4.2.1).
 - Reporting of only two non-compliances relating to exceeding limits in the EPL since the previous IEA in 2016 (Refer to Section 4.2.1).
 - Programs being undertaken by BSL to reduce potential future impacts (i.e. Discontinuation of Ammonia Gas injection, completion of the IMED Drainage Diversion Project (PRP 176), and investigating the re-use of 'Activated Char Undersized' (ACU) – Refer to Section 4.2.2).

Compliance Performance

- BSL has demonstrated proactive monitoring of compliance and active and open self-reporting of potential non-compliances to the regulatory authorities and to a community consultation panel.
- Despite the Non-Compliances identified during the IEA, the overall level of compliance and environmental performance for the Sinter Machine Emission Reduction Project (WGCP), Gypsum Plant and OPUP is good and the identified non-compliances are not expected to pose a significant environmental risk.

5 RECOMMENDATIONS

5.1 Recommendations

The recommended actions identified during the IEA are listed in Table 10. If an action relates to a non-compliance, then this is noted in this table (Also refer to Table 8 in Section 4.3.3).

Table 10 Recommended Actions

Action No.	Recommended Action	NC (Yes / No)
2019/1	<p>The Environmental Management Plan (EMP) for the WGCP should be made publicly available (e.g. on a public website) as required by the relevant condition of development consent (Refer to CC # W-3.3).</p> <p>Note: There is currently no standalone EMP. The required information may be included in various documents (Refer to CC # W3.2).</p> <p>Note: There is no requirement for a standalone operational EMP for OPUP (Refer to CC # O-6.3). As an alternative to the recommendation above, BSL could seek an amendment to the CCs for the WGCP and Gypsum Plant (i.e. CC # W-3.2, W-3.3 and G-3.4) to be consistent with CC # O-6.3. If this was done, then it would negate the requirement to make an EMP publicly available but would still ensure there is a requirement to maintain the environmental and safety management systems for the WGCP and Gypsum Plant.</p> <p>(Refer to Appendix B.1 - CC # W-3.3 and Section 4.3.5 - Prior Audit ID # 2016/5).</p>	Yes
2019/2	<p>Emissions from the WGCP may be visible despite complying with the relevant condition from the EPL for the WGCP Stack (EPL Point 107). Consequently, the operation of the WGCP Stack (EPL Point 107) may be non-compliant with Consent Condition No. 4.11 for the WGCP, despite being compliant with EPL Condition No. O4.16. This inconsistency should be resolved with the DP&E and EPA (e.g. by amending the relevant conditions).</p> <p>(Refer to Appendix B.1 - CC # W-4.11 and Section 4.3.5 - Prior Audit ID # 2016/16).</p>	Yes
2019/3	<p>The roadway between the Sinter Plant offices and the Sinter Plant building should be routinely swept or wetted down to minimise the generation of windblown and traffic generated dust.</p> <p>(Refer to Appendix B.1 - CC # O2.2, Appendix B.2 – EPL # O3.2, and Section 4.3.5 - Prior Audit ID # 2016/8).</p>	Yes
2019/4	<p>BSL should ensure compliance with the transport routes set out in the SEE for: (i) <u>all</u> chemicals transported to the site (CC # W-4.45); and (ii) non-liquid waste from the site (CC # W-4.46).</p> <p>Alternatively, BSL should seek approval for alternative routes to be followed (e.g. approved primary route/s and alternative routes when a primary route is unavailable).</p> <p>(Refer to Appendix B.1 - CC # W-4.45 & CC #W-4.46 and Section 4.3.5 - Prior Audit ID # 2016/9).</p>	Yes
2019/5	<p>Vehicles are being parked near the gate on Christy Drive. This would appear to be non-compliant with CC # W-4.47; however, it is not clear if this restriction was only intended to apply during the construction phase (when many more vehicles would be present) or whether this was meant to be an ongoing restriction. This should be raised with the DP&E and resolved accordingly.</p> <p>(Refer to Appendix B.1 - CC # W-4.47 and Section 4.3.5 - Prior Audit ID # 2016/10).</p>	Yes

Action No.	Recommended Action	NC (Yes / No)
2019/6	<p>The hyperlink to the 'FY2017 Annual Report' should be reinstated on the 'Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2017-nsw-monitoring-data/).</p> <p>(Refer to Appendix B.2 – EPL # O8.2 & EPL # M8.3).</p>	No
2019/7	<p>The No. 3 Sinter Machine Stack (EPL Pt 151) should be included in the Environmental Aspects and Impacts Register / MARS for the Sinter Plant (i.e. to indicate the potential for emissions during bypass of the Sinter Plant Waste Gas Cleaning Plant).</p> <p>(Refer to Section 4.3.5, Prior Audit ID # 2016/17).</p>	No

5.2 Opportunities for Improvement

The consent conditions were modified in 2016 to remove some conditions (e.g. for earlier project phases that are no longer applicable) and to amend some reporting requirements. Whilst this has clarified many of the consent conditions, further rationalisation may be appropriate, particularly where consent conditions are inconsistent (including with the conditions of the EPL). For example:

- The standard EPL conditions from Attachment A of DA No 26-02-01, MOD 2 for the WGCP could be removed to avoid inconsistencies between the CCs and EPL conditions. For example: it is not possible to submit the Annual Return to the EPA by “registered post” since an electronic (eConnect) system is now required to be used (Refer to CC # W-A3.3).
- Standardising the period for submitting the IEA reports, which is currently 2 months after commissioning the audit for the WGCP (CC # W-7.7) and 3 months after commissioning the audit for the OPUP (CC # O-4.2). Also “commissioning the audit” appears to be interpreted by the DP&E as being the first day of the site visit; however, this is not clear. Amending the condition to specify a date that is consistent with the IEA cycle (noting that the IEA for OPUP, CC # O-4.1, must be completed by June every 3 three years, whereas the CC for WGCP, CC # W-7.6, does not specify a date) or “X months following the date of the site visit” may reduce the likelihood of future non-compliances.
- Removing or amending CCs which are not applicable for the operations phase (e.g. W-2.2 refers to the “approved Construction Management Plan (see Condition 3.1)”; however, CC # W-3.1 was deleted from DA No 26-02-01, MOD 2 in May 2016).

Given these observations, consolidation of the consents into one set of conditions for the three developments could also be considered.

6 REFERENCES

- 1 Arriscar Pty Ltd, June 2018, *Waste Gas Cleaning Plant, Hazard Audit (2018)*.
- 2 Department of Environment and Conservation NSW, January 2007, *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.
- 3 Department of Planning and Environment, April 2016, *Consolidated Approval, DA 06_0229 MOD 1*.
- 4 Department of Planning and Environment, May 2016, *Modification of Minister's Approval, Section 75W of the Environmental Planning and Assessment Act 1979, DA 26-02-01 MOD 2*.
- 5 Department of Planning (22 September 2005), *Determination of a Development Application Pursuant to Section 80 of the Environmental Planning and Assessment Act 1979 - Application No. 26-02-01, MOD-50-4-2005-i*.
- 6 Department of Planning (3 July 2007), *Project Approval under Section 79J of the Environmental Planning and Assessment Act 1979 - Application No. DA No 06-0229*.
- 7 Department of Urban Affairs and Planning (1 August 2001), *Determination of a Development Application Pursuant to Section 80 of the Environmental Planning and Assessment Act 1979 - Application No. 26-02-01*.
- 8 NSW Government, Department of Planning and Environment, June 2018, *Independent Audit, Post-Approval Requirements*.
- 9 Standards Australia, AS/NZS ISO 19011:2018, *Guidelines for Auditing Management Systems*.

Appendices

Appendix A Documentation Reviewed

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
CONSENT CONDITIONS					
A. GENERAL / ADMINISTRATIVE CONDITIONS					
A.1 Obligation to Minimise Harm to the Environment / Undertake Activities in a Competent Manner					
W-1.1	Ore Preparation LAWWNE Aspects Register	DS.DH-IM-ADM-05.03	5	Feb-17	Yes (E)
W-4.1	EPA - Ore Preparations Meeting Minutes			22-Nov-18	Yes (E)
W-4.1	Example monthly summary report (Excel spreadsheet) submitted to the EPA, which includes the status of the regenerator, SRG plant, Ammonia storage and CEM.			Jan-19	Yes (E)
W-4.1	Independent Environmental Audit Report – Sinter Plant – Waste Gas Cleaning Plant and Gypsum Plant			2013	Yes (E)
W-A1.1	Ore Preparations – SP & RM & Bulk Operations Monthly Compliance Report			May-18	Yes (E)
W-A1.1	Ore Preparations – SP & RM & Bulk Operations Monthly Compliance Report			Jan-19	Yes (E)
W-A1.1	Example 'Ore Preparation Training Matrix' (Excel spreadsheet) for Crew D			12-Feb-19	Yes (E)
W-A1.1	Ore Preparation Departmental Induction and Conveyor Safety (In part only)	52002065			Yes (HC)
W-A1.1	SCE Monthly Environmental Compliance Report			Nov-18	Yes (E)
A.2 Terms of Approval					
G-1.2 & G-1.2A	Sinter Plant Compliance Noise Monitoring	610.18002-L01-v1.0		7-Feb-19	Yes (E)
W-2.5 & O-1.3	BlueScope Steel Ltd (BSL) – Waste Gas Cleaning Plant (WGCP) DA No. 26-02-01 MOD 2, Hazard Audit 2018 (Letter from DP&E to BSL)	DA 26-02-01		12-Jul-18	Yes (E)
W-2.5 & O-1.3	BlueScope Steel Sinter Plant Waste Gas Cleaning Plant (DA-26-02-01, MOD2), Gypsum Plant (DA-26-02-01 MOD 50-4-2005-i), Ore Preparation Upgrade Project (MP 06-0229 Mod 1) – Triennial Review, Reporting Period – 01 st July 2014 to 30 th June 2017			12-Dec-17	Yes (E)

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
W-2.5 & O-1.3	Independent Environmental Audit 2016 (Letter from DP&E to BSL)			5-Aug-16	Yes (E)
W-2.5 & O-1.3	Sinter Plant Waste Gas Cleaning Plant – DA 26-02-01 Environmental Management Report (Letter from DP&E to BSL)			24-Nov-17	Yes (E)
A.3 Limits of Approval					
O-1.4	Project Approval under Section 79J of the Environmental Planning and Assessment Act 1979	Application No. DA No 06-0229		3-July-07	Yes (E)
O-1.5	Sinter Plant Process Daily Check sheet			18-26 Feb. 2019	Yes (E)
O-1.5	Sinter Plant Monthly Report			Jan to Dec 2018	Yes (E)
A.4 Environment Protection Licence / Statutory Requirements					
W-1.3,	Environment Protection Licence	6092	-	4-Dec-18	Yes (E)
W-1.4					
W-A4.1					
O-1.6					
A.5 Structural Adequacy					
W-1.5	Construction Certificate for piling and foundations for the main plant	Certificate No. 125/01		10-Sep-01	Yes (E)
W-1.5	Construction Certificate for construction of the waste gas duct between the Sinter Plant and the WGCP	Certificate No. 185/01		10-Dec-01	Yes (E)
W-1.5	Construction Certificate for construction of the main plant	Certificate No. 65/02		21-Mar-02	Yes (E)
W-1.5	Construction Certificate for construction of the WGCP stack	Certificate No. 288/02		6-Nov-02	Yes (E)
W-1.5	Construction Certificate for construction of ancillary plant (SRG and ammonia)	Certificate No. 289/02		6-Nov-02	Yes (E)
W-1.5	Construction Certificate for construction of the water treatment plant and ancillary cooling tower area	Certificate No. 23/03		31-Jan-03	Yes (E)
W-1.5	Construction Certificate for piling and civil works for the gypsum plant	Certificate No. 65/06		20-Feb-06	Yes (E)
W-1.6	Interim Occupation Certificate for the WGCP	Certificate No. 66/03		6-May-03	Yes (E)
W-1.6	Final Occupation Certificate for the WGCP	Certificate No. 18/05		19-Jan-05	Yes (E)

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
W-1.7	Appointment of Principal Certifying Authority (Letter from BHP to Department of Urban Affairs and Planning)			23-Jul-01	Yes (E)
W-1.7	Letter from Dix Gardner Pty Ltd to Council and Department with attached first construction certificate (No. 125/01)			10-Sep-01	Yes (E)
W-1.7	Letter from BHP Steel to Council and Department with attached Pre-Construction Compliance Report			11-Sep-01	Yes (E)
W-1.8	Structural Certificate for the Design of the Structural Steel, Adsorber and Regenerator for the Waste Gas Cleaning Plant (WGCP) for Sinter Machine Emission Reduction Project (SMERP) (Letter from Sumitomo Heavy Industries)	PE/BH0215A1		15-Feb-02	Yes (E)
W-1.8	Foundations for Sinter Plant Emission Reduction Project, BHP Port Kembla – Stage 2 Construction Certificate (Letter from Woolacotts Consulting Engineers to Hatch)	83-02		19-Sep-02	Yes (E)
A.6 Statutory Requirements					
W-1.10	Environment Protection Licence	6092	-	4-Dec-18	Yes (E)
A.7 Maintenance and Operation of Plant and Equipment					
W-A1.2	Calibration data for new CEM			27-Feb-19	Yes (E)
B. ENVIRONMENTAL MANAGEMENT PLANS					
B.1 Construction Management Plan					
O-6.1	Independent Environmental Audit Report, Sinter Ore Preparation Upgrade Project		Final	Jul-13	Yes (E)
O-6.2					
B.2 Environmental Management Plan					
W-3.2 & G-3.4	Coke and Iron Department Handbook	DH-CI-ADM-00	7	Feb-18	Yes (E)
W-3.2 & G-3.4	Example 'Cokemaking & Ironmaking Env. Business Plan Report' for August to November 2018				Yes (E)
W-3.2 & G-3.4	Example 'Individual Performance and Development Review 2018-2019' for: Ore Preparation Operations Manager; Operations Engineer; and, Ore Prep shift Team Leader				Yes (E)

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
W-3.2 & G-3.4	Ore Preparation LAWWNE Aspects Register	DS.DH-IM-ADM-05.03	5	Feb-17	Yes (E)
W-3.2 & G-3.4	Ore Preparation Operations - Organisation Chart			Jan-19	Yes (E)
W-3.2 & G-3.4	Risk Scenario - Spillage and/or Fugitive Dust	Hazard 1.1.1.4-1		31-May-17	Yes (E)
W-3.3	Independent Environmental Audit (2016), Audit Report	J-000185-REP-002	0	15-Jun-16	Yes (E)
W-3.3	Independent Environmental Audit Report – Sinter Plant – Waste Gas Cleaning Plant and Gypsum Plant			2013	Yes (E)
W-3.3	SMERP Gypsum Plant Environmental Audit Report			8-Sep-10	Yes (E)
O-6.3	Independent Environmental Audit Report, Sinter Ore Preparation Upgrade Project		Final	Jul-13	Yes (E)
C. COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT / COMPLAINTS					
C.1 Provision of Information					
O-5.1	Independent Environmental Audit Report, Sinter Ore Preparation Upgrade Project		Final	Jul-13	Yes (E)
O-5.4	Independent Environmental Audit 2016 (Letter from DP&E to BSL)			5-Aug-16	Yes (E)
O-5.4	BlueScope Steel (AIS) Pty Ltd – Sinter Plant Ore Preparation Upgrade Project (OPUP) – Development Approval 06-0229 (Letter from BSL to DP&E)			24-Aug-16	Yes (E)
C.2 Systems for Receiving Complaints and Enquiries					
W-4.55, W-A2.2 & O-5.2	Community Complaint (Entry in MARS database)	ID C1258676	-	Dec-17	Yes (E)
W-4.55, W-A2.2 & O-5.2	MARS				No
W-4.55, W-A2.2 & O-5.2	Significant Environmental Incident Investigation and Reporting Process	MA-ENV-11-01	3	May-16	Yes (E)
C.3 Recording of Complaints and Follow-up Actions					
W-A2.1 & O-5.3	Community Complaint (Entry in MARS database)	ID C1258676	-	Dec-17	Yes (E)

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
W-A2.1 & O-5.3	MARS				No
W-A2.1 & O-5.3	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Jan-16 to 19-Feb-19				Yes (E)
D. COMPLIANCE MONITORING AND REPORTING					
W-2.1	Environment Protection Licence	6092	-	4-Dec-18	Yes (E)
W-2.1	Ore Preparations – SP & RM & Bulk Operations Monthly Compliance Report			May-18	Yes (E)
W-2.1	Ore Preparations – SP & RM & Bulk Operations Monthly Compliance Report			Jan-19	Yes (E)
W-2.2	SCE Monthly Environmental Compliance Report			Nov-18	Yes (E)
E. ENVIRONMENTAL STANDARDS AND CONDITIONS					
E.3 Noise – Operations Phase					
W-4.2	Sinter Plant Compliance Noise Monitoring	610.18002-L01-v1.0		7-Feb-19	Yes (E)
W-4.6					
W-4.6	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Jan-16 to 19-Feb-19				Yes (E)
W-4.7					
O-2.9					
O-2.9	Independent Environmental Audit Report, Sinter Ore Preparation Upgrade Project		Final	Jul-13	Yes (E)
O-2.10	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Jan-16 to 19-Feb-19				Yes (E)
E.5 Air Quality – Operations Phase					
O-2.1	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Jan-16 to 19-Feb-19				Yes (E)
W-4.11	Community Complaint (Entry in MARS database)	ID C1258676	-	Dec-17	Yes (E)
W-4.11	EHS Data Monitor Pro web-based application – Data recorded for March 2016 to December 2018 for EPL Pts 2, 89, 107 and 151				Yes (E)
W-4.11	'NSW Monitoring Data' page of the BSL website				

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
O-2.3	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Jan-16 to 19-Feb-19				Yes (E)
O-2.3	Fugitive Dust Management System	MA-ENV-02-02	3	Feb-18	Yes (E)
O-2.4					
O-2.4	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Jan-16 to 19-Feb-19				Yes (E)
W-4.14	EHS Data Monitor Pro web-based application – Data recorded for March 2016 to December 2018 for dioxins at EPL Pt 107				Yes (E)
E.6 Sulphur Rich Gas Management					
G-4.21A	Example monthly summary report (Excel spreadsheet) submitted to the EPA, which includes the status of the regenerator, SRG plant, Ammonia storage and CEM.			Jan-19	Yes (E)
E.9 Pollution of Waters					
W-4.30	Environment Protection Licence	6092	-	4-Dec-18	Yes (E)
E.11 Stormwater Management					
W-4.33	Independent Environmental Audit Report – Sinter Plant – Waste Gas Cleaning Plant and Gypsum Plant			2013	Yes (E)
O-2.11	Independent Environmental Audit Report, Sinter Ore Preparation Upgrade Project		Final	Jul-13	Yes (E)
O-2.12	'NSW Monitoring Data' page of the BSL website				
E.13 Radionuclides					
W-4.37	Independent Environmental Audit Report – Sinter Plant – Waste Gas Cleaning Plant and Gypsum Plant			2013	Yes (E)
W-4.37	Notice of Variation of Licence No. 6092	1110309	-	19-Mar-10	Yes (E)
E.14 Spillage Response					
E.15 Waste Generation and Management					
W-4.39	Independent Environmental Audit (2016), Audit Report	J-000185-REP-002	0	15-Jun-16	Yes (E)
W-4.39	Ore Prep Waste Management Plan				No
W-4.39	Waste Register for Coke and Ironmaking Department				No

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
W-4.40	Independent Environmental Audit (2016), Audit Report	J-000185-REP-002	0	15-Jun-16	Yes (E)
W-4.40	Independent Environmental Audit Report – Sinter Plant – Waste Gas Cleaning Plant and Gypsum Plant			2013	Yes (E)
W-4.41	Management of Waste Material	DIV-AR-RS-01		July-18	Yes (E)
W-4.41	Waste Register for Coke and Ironmaking Department				No
W-4.42	Management of Waste Material	DIV-AR-RS-01		July-18	Yes (E)
O-2.13	Independent Environmental Audit Report, Sinter Ore Preparation Upgrade Project		Final	Jul-13	Yes (E)
O-2.15	Management of Waste Material	DIV-AR-RS-01		July-18	Yes (E)
O-2.15	Waste Register for Coke and Ironmaking Department				No
E.16 Roads and Traffic					
W-4.45	Independent Environmental Audit (2016), Audit Report	J-000185-REP-002	0	15-Jun-16	Yes (E)
W-4.48	Independent Environmental Audit Report – Sinter Plant – Waste Gas Cleaning Plant and Gypsum Plant			2013	Yes (E)
E.17 Site Management					
W-4.49	Independent Environmental Audit (2016), Audit Report	J-000185-REP-002	0	15-Jun-16	Yes (E)
W-4.50					
W-4.51	Independent Environmental Audit Report – Sinter Plant – Waste Gas Cleaning Plant and Gypsum Plant			2013	Yes (E)
E.18 Design and Lighting					
W-4.52	Independent Environmental Audit Report – Sinter Plant – Waste Gas Cleaning Plant and Gypsum Plant			2013	Yes (E)
W-4.53	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Jan-16 to 19-Feb-19				Yes (E)
E.19 Environmental Awareness Training					
W-4.54	Example 'Ore Preparation Training Matrix' (Excel spreadsheet) for Crew D			12-Feb-19	Yes (E)
W-4.54	Illawarra Site Environment Awareness Refresher Training	52002852		May-14	Yes (E)

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
W-4.54	Ore Preparation Departmental Induction and Conveyor Safety (In part only)	52002065			Yes (HC)
W-4.54	SCE Monthly Environmental Compliance Report			Nov-18	Yes (E)
G. ENVIRONMENTAL REPORTING					
G.1 Annual Return					
W-A3.1, W-A3.2, W-A3.3, W-A3.4, W-A3.5 & WA3.6	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2016-2017	Yes (E)
W-A3.1, W-A3.2, W-A3.3, W-A3.4, W-A3.5 & WA3.6	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2017-2018	Yes (E)
G.3 Environmental Management Report					
W-7.4, W-7.5, O-7.2 & O-7.3	BlueScope Steel Sinter Plant Waste Gas Cleaning Plant (DA-26-02-01, MOD2), Gypsum Plant (DA-26-02-01 MOD 50-4-2005-i), Ore Preparation Upgrade Project (MP 06-0229 Mod 1) – Triennial Review, Reporting Period – 01 st July 2014 to 30 th June 2017			12-Dec-17	Yes (E)
W-7.4, W-7.5, O-7.2 & O-7.3	Sinter Plant Waste Gas Cleaning Plant – DA 26-02-01 Environmental Management Report (Letter from DP&E to BSL)			24-Nov-17	Yes (E)
W-7.4, W-7.5, O-7.2 & O-7.3	Sinter Plant Waste Gas Cleaning Plant (DA-26-02-01), Gypsum Plant (DA-26-02-01 MOD 50-4-2005-i) and Ore Preparation Upgrade Project (MP 06-0229 MOD 1) – Triennial Environmental Management Report (Letter from DP&E to BSL)			9-Jan-18	Yes (E)
G.4 Independent Environmental Audit					
W-7.6 & W-7.7	Independent Environmental Audit (2016), Audit Report	J-000185-REP-002	0	15-Jun-16	Yes (E)
W-7.6 & W-7.7	Independent Environmental Audit 2016 (Letter from DP&E to BSL)			5-Aug-16	Yes (E)

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
W-7.7	BlueScope Steel (AIS) Pty Ltd – Sinter Plant Ore Preparation Upgrade Project (OPUP) – Development Approval 06-0229 (Letter from BSL to DP&E)			24-Aug-16	Yes (E)
O-4.1 & O-4.2	Independent Environmental Audit (2016), Audit Report	J-000185-REP-002	0	15-Jun-16	Yes (E)
O-4.1 & O-4.2	Independent Environmental Audit 2016 (Letter from DP&E to BSL)			5-Aug-16	Yes (E)
G.5 Incident Reporting					
O-7.1, W-A3.7 & W-A3.8	MARS record for exceedance of the wet weather iron limit	i1017747		28-Dec-16	Yes (E)
O-7.1,	MARS record for exceedance of the solid particulates limit	i1341316		5-Dec-18	Yes (E)
W-A3.7 & W-A3.8	Significant Environmental Incident Investigation and Reporting Process	MA-ENV-11-01	3	May-16	Yes (E)
ENVIRONMENT PROTECTION LICENCE CONDITIONS					
LIMIT CONDITIONS					
L2 Load Limits					
L2.4	Air Pollutant Emissions Report 1 July 2015 to 30 June 2016 – Data for Sinter Plant WGCP				Yes (E)
L2.4	Air Pollutant Emissions Report 1 July 2015 to 30 June 2016 – Data for Sinter Plant WGCP				Yes (E)
L2.4	'NSW Monitoring Data' page of the BSL website				
L3 Concentration Limits					
L3.4	EHS Data Monitor Pro web-based application – Data recorded for March 2016 to December 2018 for EPL Pts 2, 107 and 151				Yes (E)
L3.4	'NSW Monitoring Data' page of the BSL website				
L3.5	EHS Data Monitor Pro web-based application – Data recorded for March 2016 to December 2018 for EPL Pt 89				Yes (E)
L3.5	'NSW Monitoring Data' page of the BSL website				

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
L6 Noise Limits					
L6.2	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Jan-16 to 19-Feb-19				Yes (E)
OPERATING CONDITIONS					
O3 Dust					
O3.2	Fugitive Dust Management System	MA-ENV-02-02	3	Feb-18	Yes (E)
O3.2	Port Kembla Wind Forecast: 23 February			23-Feb-19	Yes (E)
O3.5	Fugitive Dust Management System	MA-ENV-02-02	3	Feb-18	Yes (E)
O3.5	Stockpile Environment Management Plan Risk Assessment – Example for No.2 Pad Dolomite Stockpile			Jun-18	Yes (E)
O4 Processes and management					
O4.17 & O4.18	Example monthly summary report (Excel spreadsheet) submitted to the EPA, which includes the status of the regenerator, SRG plant, Ammonia storage and CEM.			Jan-19	Yes (E)
MONITORING AND RECORDING CONDITIONS					
M1 Monitoring records					
M1.2	EHS Data Monitor Pro web-based application – Data recorded for March 2016 to December 2018 for EPL Pts 2, 89, 107 and 151				Yes (E)
M1.2	‘NSW Monitoring Data’ page of the BSL website				
M1.3	‘LIMS Solutions’ database				No
M2 Requirement to monitor concentration of pollutants discharged					
M2.1 & M2.2	EHS Data Monitor Pro web-based application – Data recorded for March 2016 to December 2018 for EPL Pts 2 and 107				Yes (E)
M2.1 & M2.2	‘NSW Monitoring Data’ page of the BSL website				
M2.5 & M2.6	‘NSW Monitoring Data’ page of the BSL website				

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
M3 Testing methods - concentration limits					
M3.1	Approval to use USEPA Conditional Test Method CTM-13B (Letter from EPA to BSL)			17-Nov-15	Yes (E)
M8 Requirement to monitor volume or mass					
M8.1	'Manly Hydraulics Laboratory' online system				
M8.2 & M8.3	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2016-2017	Yes (E)
M8.2 & M8.3	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2017-2018	Yes (E)
M8.2 & M8.3	'NSW Monitoring Data' page of the BSL website				
M9 Other monitoring and recording conditions					
M9.1	Independent Environmental Audit (2016), Audit Report	J-000185-REP-002	0	15-Jun-16	Yes (E)
REPORTING CONDITIONS					
R4 Other reporting conditions					
R4.1	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2016-2017	Yes (E)
R4.1	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2017-2018	Yes (E)
R4.1	'NSW Monitoring Data' page of the BSL website				
R4.2	EPA and BSL Environment Department Liaison Meeting Minutes			9-Jun-16	Yes (E)
R4.2	Revamped ambient monitoring data site (Email from BSL to EPA)			20-Feb-18	Yes (E)
R4.3 & R4.4	Ambient Air Monitoring Network Peer Review	0480622	1	23-Nov-18	Yes (E)
R4.5	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Jan-16 to 19-Feb-19				Yes (E)
SPECIAL CONDITIONS					
E5 Sinter Machine Short Term Bypass Arrangements					
E5.3	Sinter Plant Waste Gas Cleaning Plant By-Pass (Letter from BSL to EPA)			29-May-18	Yes (E)

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
E5.4 & E5.5	EHS Data Monitor Pro web-based application – Data recorded for 23-28 May 2018 (i.e. during bypass conditions) for EPL Pt 151				Yes (E)
E5.4 & E5.5	'NSW Monitoring Data' page of the BSL website				
E5.6 & E5.7	'NSW Monitoring Data' page of the BSL website				
E5.9	May 2018 Sinter Machine Bypass Monitoring Report			23-28 May 2018	Yes (E)
E5.10	Sinter Plant Waste Gas Cleaning Plant By-Pass (Letter from BSL to EPA)			29-May-18	Yes (E)
E7 Sinter Plant Waste Reuse Trials					
E7.2	Approval of Activated Char Undersized Reuse Trial (Letter from EPA to BSL)			15-Jul-16	Yes (E)
E7.2	Erratum: Approval of Activated Char Undersized (ACU) Reuse Trial (Letter from EPA to BSL)			19-Jul-16	Yes (E)
E7.2	Approval of Activated Char Undersized Reuse Trial 2 (Letter from EPA to BSL)			31-Jan-18	Yes (E)
E7.3	Trial 1 Report Reuse of Activated Char Undersized in the Sinter Plant (Letter from EPA to BSL)			8-Nov-17	Yes (E)
E7.3, E7.4, E7.6 & E7.7	Reuse of Activated Char Undersize (ACU) in the Sinter Plant, Trial 1 Report			Jul-17	Yes (E)
E7.3, E7.4, E7.6 & E7.7	Reuse of Activated Char Undersize (ACU) in the Sinter Plant, Trial 2 Report			Dec-18	Yes (E)
ACTIONS FROM PREVIOUS IEAs					
2016/1	Construction Certificate for piling and foundations for the main plant	Certificate No. 125/01		10-Sep-01	Yes (E)
2016/1	Construction Certificate for construction of the waste gas duct between the Sinter Plant and the WGCP	Certificate No. 185/01		10-Dec-01	Yes (E)
2016/1	Construction Certificate for construction of the main plant	Certificate No. 65/02		21-Mar-02	Yes (E)
2016/1	Construction Certificate for construction of the WGCP stack	Certificate No. 288/02		6-Nov-02	Yes (E)
2016/1	Construction Certificate for construction of ancillary plant (SRG and ammonia)	Certificate No. 289/02		6-Nov-02	Yes (E)

ID #	Document Title	Document No.	Rev. No.	Date	Copy Taken? (Yes/No)
2016/1	Construction Certificate for construction of the water treatment plant and ancillary cooling tower area	Certificate No. 23/03		31-Jan-03	Yes (E)
2016/1	Construction Certificate for piling and civil works for the gypsum plant	Certificate No. 65/06		20-Feb-06	Yes (E)
2016/2	Interim Occupation Certificate for the WGCP	Certificate No. 66/03		6-May-03	Yes (E)
2016/2	Final Occupation Certificate for the WGCP	Certificate No. 18/05		19-Jan-05	Yes (E)
2016/3	Appointment of Principal Certifying Authority (Letter from BHP to Department of Urban Affairs and Planning)			23-Jul-01	Yes (E)
2016/3	Letter from Dix Gardner Pty Ltd to Council and Department with attached first construction certificate (No. 125/01)			10-Sep-01	Yes (E)
2016/3	Letter from BHP Steel to Council and Department with attached Pre-Construction Compliance Report			11-Sep-01	Yes (E)
2016/4	Structural Certificate for the Design of the Structural Steel, Adsorber and Regenerator for the Waste Gas Cleaning Plant (WGCP) for Sinter Machine Emission Reduction Project (SMERP) (Letter from Sumitomo Heavy Industries)	PE/BH0215A1		15-Feb-02	Yes (E)
2016/4	Foundations for Sinter Plant Emission Reduction Project, BHP Port Kembla – Stage 2 Construction Certificate (Letter from Woolacotts Consulting Engineers to Hatch)	83-02		19-Sep-02	Yes (E)
2016/6	Independent Environmental Audit 2016 (Letter from DP&E to BSL)			5-Aug-16	Yes (E)
2016/6	BlueScope Steel (AIS) Pty Ltd – Sinter Plant Ore Preparation Upgrade Project (OPUP) – Development Approval 06-0229 (Letter from BSL to DP&E)			24-Aug-16	Yes (E)
2016/16	Environment Protection Licence	6092	-	4-Dec-18	Yes (E)
2016/16	Community Complaint (Entry in MARS database)	ID C1258676	-	Dec-17	Yes (E)
2016/17	Ore Preparation LAWWNE Aspects Register	DS.DH-IM-ADM-05.03	5	Feb-17	Yes (E)

Appendix B Audit Tables

The findings and recommended actions for each relevant condition, based on the personnel interviews and document reviews, are listed in Table 11 (Conditions of Development Consent) and Table 12 (Additional Conditions from EPL). The findings and recommendations from the site and equipment inspections (28 February and 1 March 2019) are listed in Table 13.

B.1 Conditions of Development Consent

Table 11 Audit Findings (Conditions of Development Consent)

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
A. GENERAL / ADMINISTRATIVE CONDITIONS				
A.1 Obligation to Minimise Harm to the Environment / Undertake Activities in a Competent Manner				
W-1.1	The Applicant must implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction, operation, and where relevant, the decommissioning of the development.	<p>Controls are listed in the Environmental Aspects and Impacts Register (DS.DH-IM-ADM-05.03, Rev. 5, dated February 2017, copy provided). This information is also included in the on-line hazard register (MARS), which was sighted and appeared to correlate with the information in the Environmental Aspects and Impacts Register. MARS is a 'living system', which includes the audit history for the listed controls.</p> <p>The listed controls are mainly for the operation phase. BSL advised that if construction (or decommissioning) was to be required, then a separate risk assessment would be undertaken to identify the required controls.</p> <p>A relatively large number of Pollution Reduction Programs are listed in the EPL (Such as PRP 176 for the IMED diversion project). This indicates an ongoing program of implementing additional risk reduction measures.</p> <p>Some controls listed in the Environmental Aspects and Impacts Register were spot-checked during the site inspections (Refer to Appendix B.3).</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
W-4.1	<p>The Waste Gas Cleaning Plant must be designed and operated with the objective that emissions from the Sinter Plant do not result in any adverse impacts to the environment or human health in the adjacent community.</p>	<p>This broad, objective-based, Consent Condition (CC), is difficult to assess in isolation and is therefore addressed through the assessment of compliance with the other CCs and the conditions of the EPL (i.e. As covered in Section 4 of this report).</p> <p>Meeting this overall objective is also evidenced through:</p> <ul style="list-style-type: none"> • Relatively few incidents and no complaints (other than one regarding a visible emission from the WGCP stack) associated with the WGCP since the previous IEA (Refer to Section 4.2.1); • Relatively few identified non-compliances in the previous IEA and this IEA (Refer to Sections 4.3.2 and 4.3.3); • Active communication with the EPA, with meetings every 6 to 12 weeks (Example minutes sighted for 22-Nov-18, copy provided) and submission of a monthly plant status report (Example provided for Jan-19); and • Active communication via the Community Consultation Committee (Minutes are available at: http://bsi-illawarraweb-prod.elasticbeanstalk.com/community/community-consultative-committee/). 	Compliant	
W-A1.1 [Also EPL # O1.1]	<p>Licensed activities must be carried out in a competent manner. This includes:</p> <ul style="list-style-type: none"> • the processing, handling, movement and storage of materials and substances used to carry out the activity; and 	<p>It is difficult to assess this CC in isolation, however, ongoing competency is demonstrated through compliance with the CCs and the conditions of the EPL (i.e. As covered in Section 4 of this report). The systems used to ensure competency of plant operation and contractors were also reviewed during the IEA.</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<ul style="list-style-type: none"> the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. 	<p>Plant Operations</p> <p>Operations are audited with compliance tracked by BSL on a quarterly basis. Example compliance reports were provided for Ore Preparations (i.e. including the Sinter Plant) for May-18 and Jan-19. These specifically include a reference to the general EPL condition and list examples of the actions / evidence required to demonstrate compliance.</p> <p>An example 'Ore Preparation Training Matrix' (Excel spreadsheet, dated 12-Feb-19) was provided for Crew D. Training with an environmental focus is listed in this training matrix (Also refer to CC # W-4.54) and appeared to be comprehensive with a high level of completion. For example:</p> <ul style="list-style-type: none"> 'Cleaning Around a Moving Conveyor'. 'Illawarra Waste Management Awareness'. 'Fugitive Dust Management Awareness'. Training for Level 2 and Level 3 Operators (e.g. 'Waste Gas Handling', 'Water Treatment Plant', 'Sulphur Rich Gas Cleaning', etc.). 'Ore Prep Environment Awareness'. <p>Contractors</p> <p>Contractors are audited with compliance tracked by BSL on a monthly basis. An example monthly compliance report was provided for SCE Industrial Services (Nov-18), which lists examples of the actions / evidence required to demonstrate compliance with EPL licence requirements and lists examples of the actions / evidence required to demonstrate compliance (e.g. training in place).</p>		

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
A.2 Terms of Approval				
G-1.2 & G-1.2A (Supercedes W-1.2)	<p>The Applicant must carry out the development generally in accordance with:</p> <ul style="list-style-type: none"> (a) DA No. 26-02-01 submitted to the Department of Urban Affairs and Planning; (b) SEE, titled 'Sinter Plant Waste Gas Cleaning Plant - Statement of Environmental Effects - Final', dated January 2001, and prepared by Sinclair Knight Merz Pty Ltd; (c) additional information titled 'Preliminary Hazard Analysis - Waste Gas Cleaning Plant - Sinter Emission Reduction Project, BHP Port Kembla'; dated 19 March 2001, and prepared by Orica Engineering Pty Ltd; (d) additional information in the fax titled 'Relocation of Noise Monitoring Reference Point', dated 10 April 2001, and prepared by the Applicant; (e) relevant prescribed conditions in clause 98 of the Environmental Planning and Assessment Regulation 2000; (f) MOD 1; and (g) MOD 2. <p>In the event of an inconsistency between:</p> <ul style="list-style-type: none"> (a) the conditions of this consent and any document listed in condition 1.2, the conditions of this consent shall prevail to the extent of the inconsistency; and (b) any document listed in condition 1.2, and any other document listed in condition 1.2, the most 	<p>It is difficult to verify compliance with all aspects of this CC, therefore a sampling approach was adopted as follows:</p> <ul style="list-style-type: none"> (a), (b), (c), (e), (f) and (g) The WGCP (Including Gypsum Plant) was visited during the site inspection (Refer to Section 2.3.5). Any relevant observations are recorded in Appendix B.3. (d) BSL advised that the discussion with EPA resulted in the monitoring of noise at the Gabriella Monument on Christy Drive (Also refer to EPL condition # L6.5). An example survey report was sighted (By SLR Consulting Australia Pty Ltd, dated 7-Feb-19, copy provided), which showed compliance with the 70 DB(A) noise criterion. <p>Note: The memorial has been relocated; however, the noise monitoring was undertaken at the original location in accordance with EPL # L6.5.</p> <p>Although it was not possible to verify all requirements of this CC within the scope of this audit, it has been categorised as 'Compliant' based on the evidence sampled.</p>	<p>Compliant</p>	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>recent document shall prevail to the extent of the inconsistency</p>			
<p>O-1.1 & O-1.2</p>	<p>The Proponent shall carry out the project generally in accordance with the:</p> <ul style="list-style-type: none"> (a) Major Project Application 06_0229; (b) <i>Ore Preparation Upgrade Project - Environmental Assessment</i> dated February 2007, and prepared by CH2M HILL Australia Pty Ltd; (c) Correspondence titled <i>BlueScope Steel's Proposed Ore Preparation Plant Upgrade - Reference: 06-0229</i> dated 2 May 2007 and containing <i>Attachment 1: Response to Issues Raised in Submissions and Additional Statement of Commitments</i>; and (d) MOD 1. <p>In the event of an inconsistency between:</p> <ul style="list-style-type: none"> (a) the conditions of this approval and any document listed in condition 1.1 inclusive, the conditions of this approval shall prevail to the extent of the inconsistency; and (b) any document listed in condition 1.1 inclusive, and any other document listed in condition 1.1 inclusive, the most recent document shall prevail to the extent of the inconsistency. 	<p>It is difficult to verify compliance with all aspects of this CC, therefore a sampling approach was adopted as follows:</p> <p>(a), (b), (c) and (d) The Sinter Plant (Including facilities covered by the OPUP) was visited during the site inspection (Refer to Section 2.3.5). Any relevant observations are recorded in Appendix B.3.</p> <p>Although it was not possible to verify all requirements of this CC within the scope of this audit, it has been categorised as 'Compliant' based on the evidence sampled.</p>	<p>Compliant</p>	
<p>W-2.5 & O-1.3</p>	<p>The Proponent shall comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of:</p> <ul style="list-style-type: none"> (a) any reports, plans or correspondence that are submitted in accordance with this approval; and 	<p>Note: CC # W-2.5 is a new consent condition, which was added since the previous IEA in 2016. It has equivalent wording to CC # O-1.3.</p> <p>BSL advised that the DP&E has not requested specific additional requirements but have had correspondence to clarify actions from previous audits (e.g. 2016 IEA) and to re-</p>	<p>Compliant</p>	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	(b) the implementation of any actions or measures contained in these reports, plans or correspondence.	<p>submit a 'Triennial Environmental Management Report'. For example:</p> <ul style="list-style-type: none"> The approval letter following the IEA in 2016 (dated 5-Aug-16, copy provided) included a specific requirement to post information regarding OPUP on the BSL website by 30-Aug-16 (Refer to CC # O-5.4 and CC # W-7.7). The approval letter following the Hazard Audit for the WGCP in 2018 (dated 12-Jul-18, copy provided) included a requirement to implement the recommendations and to submit a progress report by February 2019 (Note: Hazard Audit related requirements were excluded from the scope of the IEA – Refer to Section 1.4). When the first 'Triennial Environmental Management Report' was submitted to the DP&E (26-Oct-17), the Department advised that additional information was required and that it did not comply with Departmental guidelines. Therefore, it was revised and resubmitted. The letter requesting resubmission of the report, and the revised 'Triennial Environmental Management Report' report, are available on the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/). <p>This observation is consistent with the consultation with the DP&E prior to audit (Refer to Section 2.3.1).</p>		
A.3 Limits of Approval				
O-1.4	This approval shall lapse five years after the date on which it is granted, unless the works the subject of this approval are physically and substantially commenced on or before that time.	The approval for OPUP was dated 3 July 2007. The plant associated with the OPUP was commissioned in June 2009 (Refer to Section 1.1.3).	Compliant	

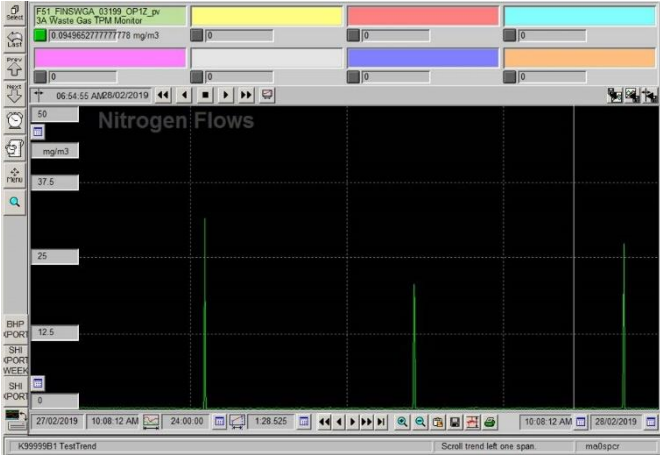
CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
O-1.5	The maximum production capacity from the upgraded Sinter Plant shall be limited to 6.6 million tonnes per annum.	<p>The daily production data is recorded (Example data provided for 18-26 February 2019). The data for 23 February 2019 showed production of 11,633 tonnes per day, which equates to c. 4.2 million tonnes per annum.</p> <p>Yearly production data is also recorded. Example data for Jan to Dec 2018 was provided, with the total production reported to be 3.86 million tonnes.</p> <p>BSL advised that it is not possible to operate at 6.6 million tonnes per annum since the PKSW is currently only operating one blast furnace (Refer to Section 1.1.3).</p>	Compliant	
A.4 Environment Protection Licence / Statutory Requirements				
W-1.3	Prior to the commencement of any construction activities, the Applicant must apply to the EPA for a licence variation for the development.	<p>BSL has a current EPL licence (EPL 6092, dated 4-Dec-18, copy provided).</p> <p>A historical listing of the EPL revisions issued to BSL is included on the EPA website (Sighted). A licence variation was issued by the EPA in June 2007, which confirms that variations were being included as a result of this development.</p>	Compliant	
W-1.4	The Applicant must, in the opinion of the EPA, be a fit and proper person to hold a licence under the Protection of the Environment Operation Act 1997, having regard to the matters in Section 83 of that Act.	<p>BSL has a current EPL licence (EPL 6092, dated 4-Dec-18, copy provided).</p> <p>No issues were raised by the EPA representative prior to the IEA (Refer to Section 2.3.1).</p>	Compliant	
W-A4.1 [Also EPL # G1.1 to G1.3]	<p>Copy of licence kept at the premises or on the vehicle or mobile plant.</p> <p>A copy of this licence must be kept at the premises or on the vehicle or mobile plant to which the licence applies.</p> <p>The licence must be produced to any authorised officer of the EPA who asks to see it.</p>	This Consent Condition is the same as included in the EPL; however, the EPL only refers to keeping licence at the site (i.e. not on the “vehicle or mobile plant” or being made available when “operating the vehicle or mobile plant”), which would appear to be more relevant in this case.	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	The licence must be available for inspection by any employee or agent of the licensee working at the premises or operating the vehicle or mobile plant.	<p>A copy of the EPL is held by the BSL environment department (Not sighted) and is available on the BSL intranet (Sighted).</p> <p>A hyperlink is included on the shared Environment intranet page, which links to the EPL on EPA website (i.e. to ensure always up-to-date). It was verified during the audit that this link is working.</p>		
O-1.6	The Proponent shall ensure that all licences, permits and approvals are obtained and kept up-to-date as required throughout the life of the development. No condition of this approval removes the obligation for the Proponent to obtain, renew or comply with such licences, permits or approvals. The Proponent shall ensure that a copy of this approval and all relevant environmental approvals are available on the site at all times during the project.	<p>BSL has a current EPL licence (EPL 6092, dated 4-Dec-18, copy provided), which is available on the EPA website.</p> <p>There have been recent variations to the EPL to accommodate the bypass of the Sinter Plant WGCP Stack and the ACU trial (Refer to Appendix B.2).</p> <p>Also refer to CC # W-A4.1 above.</p>	Compliant	
A.5 Structural Adequacy				
W-1.5	Before the commencement of construction work on any aspect of the development, the Applicant must obtain a construction certificate for this aspect of the development in accordance with Sections 109C and 109D of the Environmental Planning and Assessment Act 1979.	<p>The construction certificates could not be located during the previous IEA in 2016. BSL has now located the construction certificates for the WGCP (DA 26-02-01) and the following copies were provided during the IEA:</p> <ul style="list-style-type: none"> • Certificate No. 125/01 (dated 10-Sep-01) for piling and foundations for the main plant [1st construction certificate]. • Certificate No. 185/01 (dated 10-Dec-01) for construction of the waste gas duct between the Sinter Plant and the WGCP [2nd construction certificate]. • Certificate No. 65/02 (21-Mar-02) for construction of the main plant [3rd construction certificate]. 	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<ul style="list-style-type: none"> • Certificate No. 288/02 (dated 6-Nov-02) for construction of the WGCP stack [4th construction certificate]. • Certificate No. 289/02 (dated 6-Nov-02) for construction of ancillary plant (SRG and ammonia) [5th construction certificate]. • Certificate No. 23/03 (dated 31-Jan-03) for construction of the water treatment plant and ancillary cooling tower area [6th construction certificate]. • Certificate No. 65/06 (20-Feb-06) for piling and civil works for the gypsum plant [7th construction certificate]. <p>The WGCP was constructed in 2003 (Certificates 1-6) and the Gypsum Plant was commissioned in 2007 (Certificate 7).</p>		
W-1.6	<p>Before commencement of operations permitted by this consent, the Applicant must obtain an occupation certificate for the buildings and structures which comprise the development, in accordance with Sections 109C and 109D of the Environmental Planning and Assessment Act 1979.</p>	<p>The occupation certificates could not be located during the previous IEA in 2016. BSL has now located the interim and final occupation certificates for the WGCP (DA 26-02-01) and copies were provided during the IEA (Certificate No. 66/03, dated 6-May-03 and Certificate No. 18/05, dated 19-Jan-05).</p>	Compliant	
W-1.7	<p>Prior to commencement of work, the person having the benefit of the Development Consent and a Construction Certificate shall:</p> <ul style="list-style-type: none"> • appoint a Principal Certifying Authority and notify Council and the Secretary of the appointment (if Council is not appointed); and • notify Council and Secretary of their intention to commence the erection of the building (at least 2 days' notice is required). <p>The Principal Certifying Authority shall determine when inspections and compliance certificates are required.</p>	<p>Evidence of appointing a Principal Certifying Authority and notifying Council and the Department of their intention to commence construction could not be located during the previous IEA in 2016.</p> <p>BSL has now located the letter sent to the Department appointing the Principal Certifying Authority (Letter dated 23-Jul-01, copy provided).</p> <p>A letter notifying Council and the Department of their intention to commence construction could not be located. This relates to a pre-construction phase of the development (i.e. out of scope of the current IEA); however, this CC has been marked as 'Compliant' since evidence was provided of</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		submitting the first construction certificate (Letter to Council and Department for Certificate No. 125/01, dated 10-Sep-01, copy provided) and the pre-construction compliance report (Letter to Council and Department dated 11-Sep-01, copy provided).		
W-1.8	To prevent any damage by wind uplift, adequate fixing and bracing is to be provided to structures to withstand the loading requirements of AS 1170.1 and AS1170.2.	<p>Design records could not be located during the previous IEA in 2016; however, an engineering certification from Sumitomo Heavy Industries was provided for the current IEA (dated 15-Feb-02). It is reported in this document that:</p> <p><i>All design loads for the structural design was determined in accordance with the following standards.</i></p> <p><i>AS 1170.1 Dead and live loads</i></p> <p><i>AS 1170.2 wind loads</i></p> <p><i>AS 1170.4 Earthquake loads</i></p> <p>The design of the foundations was certified against AS 1170 by Woolacotts Consulting Engineers (Letter dated 19-Sep-02, copy provided).</p> <p>It is reported in the 2016 IEA report, that: “The engineering calculations report and basis of design report for the new stack were sighted (copies provided – part only). These were prepared by SOTO Consulting Engineers and appeared to be comprehensive. For example, the engineering calculations report included finite element analysis results for the new stack, including for each step of the stack construction sequence and the basis of design report included various load combinations (wind, earthquake, etc.)”.</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
W-1.9	Demolition activities shall comply with the requirements of AS 2601-1991.	BSL advised that there have been no significant demolition activities at the WGCP (including following the fire in 2014). No evidence of demolition activities was observed during the site inspection on 1 March 2019.	Not Triggered	
A.6 Statutory Requirements				
W-1.10	The Applicant must ensure that all necessary licences, permits and approvals are obtained and kept up-to-date as required throughout the life of the development. No condition of this approval removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approvals.	BSL has a current EPL licence (EPL 6092, dated 4-Dec-18, copy provided), which is available on the EPA website. There have been recent variations to the EPL to accommodate the bypass of the Sinter Plant WGCP Stack and the ACU trial (Refer to Appendix B.2). Also refer to CC # W-A4.1 above.	Compliant	
A.7 Maintenance and Operation of Plant and Equipment				
W-A1.2 [Also EPL # O2.1]	All plant and equipment installed at the premises or used in connection with the licensed activity: <ul style="list-style-type: none"> • must be maintained in a proper and efficient condition; and • must be operated in a proper and efficient manner. 	Also refer to CC # W-A1.1. This is a general EPL condition (i.e. same as EPL # O1.2). Two environmental related systems were reviewed during the audit: (i) new Continuous Emission Monitors (CEMs) for particulates on the precipitator outlets (Also refer to Section 4.2.1); and, (ii) the pumps at the IMED (which pump water from the IMED to the No 2 Blower Station Drain – Refer to Section 4.2.2). <p>New Continuous Emission Monitors (CEMs)</p> A new Continuous Emission Monitor (CEM) has been installed on the outlet of the electrostatic precipitators at the 3A Sinter Machine Fan (Refer to Section 3.2.2). BSL was still in the process of calibrating this CEM at the time of the IEA. BSL advised that another CEM is planned at the 3B Sinter Machine Fan. A CEM will not need to be relocated during bypass mode once the two new CEMs are fully commissioned.	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<p>The CEM is a new device, but the same type of device as the CEM on WGCP Stack. BSL advised that it is expected to operate in a similar manner.</p> <p>The new CEM does a self-calibration check every 8 hrs (zero and full range). This is shown on the “green spikes” on the following figure (Sample data for a 24-hour period).</p> <p>Figure 5 Self-Check of Particulate Monitoring Device</p>  <p>The lens will be cleaned, but no records and no WO has been set up for periodic cleaning yet (as device is installed but not primary device yet – it will be when some older devices are removed). The maintenance strategy and maintenance plan have not been developed yet.</p> <p>Records show the new CEM was installed c. 3 months ago during a down day in December 2018.</p>		

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<p>Pumps at the IMED</p> <p>These pumps are operated with a duty standby arrangement. An additional spare is held in the store (Not sighted).</p> <p>There is a maintenance plan to change the pumps every 2 years, but they have typically been replaced more frequently (due to failures). BSL advised that this plan is now under review.</p> <p>BSL advised that a failed pump had recently been sent offsite for repair and the spare pump had been installed. The repaired pump will go back to store as the new spare.</p>		
B. ENVIRONMENTAL MANAGEMENT PLANS				
B.1 Construction Management Plan				
W-3.1 & G-3.2A	DELETED.			
O-6.1	<p>Prior to the commencement of 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 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 	<p>The scope of the 2016 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases. However, this CC has been assessed as 'Compliant' since it is marked as complete in the 2013 IEA (Refer to Section 1.4).</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>required from authorities and other stakeholders, and key legislation 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> <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. <p>(d) a description of the roles and responsibilities for all relevant employees involved in the construction of the project;</p> <p>(e) the additional studies listed under condition 6.2 of this approval; and</p> <p>(f) complaints and enquiries handling procedures during construction.</p> <p>The Plan shall be submitted for the approval of the Secretary no later than one month prior to the commencement of any construction works associated with the project, or within such period otherwise agreed by the Secretary. Construction works shall not commence until written approval has been received from the Secretary.</p>			

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
O-6.2	<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> <ul style="list-style-type: none"> (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 <i>Acid Sulfate Soil Manual</i> (Acid Sulfate Soil Management Advisory Committee, 1998); (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 <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004). The Plan shall include specific measures to avoid sediment-laden storm water from entering Port Kembla Inner Harbour, and a monitoring program for stormwater leaving the site; (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: <ul style="list-style-type: none"> i. details of construction activities and a schedule for construction works; ii. identification of construction activities that have the potential to generate noise and/or vibration impacts on surrounding land uses, particularly residential areas; 	<p>The scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases (Refer to Section 1.4). However, this CC has been assessed as 'Compliant' since it is marked as complete in the 2013 IEA.</p> <p>If BSL undertakes construction work in the future, then any approval would consider the need to manage construction related impacts through new conditions.</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<ul style="list-style-type: none"> 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; 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 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>(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>			


CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
B.2 Environmental Management Plan				
W-3.2	<p>The Applicant must prepare and implement an Environmental Management Plan for all operations at the site. This plan must:</p> <ul style="list-style-type: none"> (a) describe the proposed operations; (b) identify all the relevant statutory requirements that apply to the operation of the development; (c) set standards and performance measures for each of the relevant environmental issues; (d) describe what actions and measures will be implemented to mitigate the potential impacts of the development, and to ensure that the development meets these standards and performance measures; (e) describe what measures and procedures will be implemented to: <ul style="list-style-type: none"> • register and respond to complaints; • ensure the operational health and safety of the workers; and • respond to potential emergencies, such as plant failure; (f) describe the role, responsibility, authority, and accountability of all the key personnel involved in the operation of the development; (g) include the following: <ul style="list-style-type: none"> • a Waste Management Plan (Condition 4.39); • a Contingency Plan (Condition 5.11). 	<p>There is no standalone EMP for the WGCP. The required information is included in various documents.</p> <p>(a) and (b) Is addressed in the Coke and Ironmaking Department Handbook (DH-CI-ADM-00, dated Feb-18, copy provided) and Process User Requirement Specification (PURS) manual (sighted, copy not provided).</p> <p>(c) and (d) The Ore Preparation LAWWNE Aspects Register was sighted (DS.DH-IM-ADM-05.03, copy provided - Also refer to Section 4.1.2). This information is also included in the MARS database. Sighted 'Risk Scenarios' in MARS and specifically Hazard 1.1.1.4-1 – 'Spillage and/or Fugitive Dust' (dated 31-May-17, copy provided). MARS includes some legal requirements (e.g. EPL conditions).</p> <p>BSL can generate a 'Monthly Environment Report' from MARS and performance is tracked in the Cokemaking & Ironmaking Env. Business Plan Reports (copy provided for August to November 2018). Performance can be compared against previous years.</p> <p>Targets are set at a coke and ironmaking level (which are then cited in the relevant position descriptions – see (f) below).</p> <p>(e) Incidents are categorised by type and location and incident category. Refer to CC # W-4.55 for complaint management.</p> <p>(f) The 'Ore Preparation Operations - Organisation Chart' was sighted (dated January 2019, copy provided). 'Individual Performance and Development Review 2018-2019' documents were also sighted, which include environment related responsibilities.</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>The Environmental Management Plan must be approved by the Secretary before the Waste Gas Cleaning Plant may be commissioned.</p>	<p>(g) It is reported in the 2016 IEA report that it was reported in BSL's 2013 Annual Environmental Management Report that the Waste Management Plan was sent to the Office of Environment and Heritage, Council and the Department of Planning in c. January - March 2003 and was approved by the Department of Planning on 13 May 2003 (Dept. Ref. SOO/01294 – not verified). Similarly, it was reported that the Contingency Plan was submitted (recipient not identified) on 6 Jan 2003.</p>		
W-3.3	<p>The Applicant must ensure that a copy of the Environmental Management Plan is submitted to Council and is publicly available.</p>	<p>There is no standalone EMP for the WGCP. The required information is included in various documents (Refer to CC # W3.2).</p> <p>This CC was not verified in the IEA reports for 2013 (copy provided) and 2010 (copy provided) and no evidence could be found during the current (or previous) IEA to demonstrate that all documents constituting the EMP have been submitted to Council.</p> <p>It is reported in the 2014 Environmental Management Report (extract provided) that the Waste Management Plan and a Contingency Plan for environmental impacts were submitted to the Department of Planning in 2003 during construction of the plant.</p> <p>It is not clear if all documents constituting the EMP were made publicly available (e.g. during the construction / commissioning phases) and it does not appear to be included on the current website (The information on the current website appears to be for the OPUP only).</p>	Non-Compliant	<p>2019/1 – The Environmental Management Plan (EMP) for the WGCP should be made publicly available (e.g. on a public website) as required by the relevant condition of development consent (Refer to CC # W-3.3).</p> <p>Note: There is currently no standalone EMP. The required information may be included in various documents (Refer to CC # W3.2).</p>

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
				<p>Note: There is no requirement for a standalone operational EMP for OPUP (Refer to CC # O-6.3). As an alternative to the recommendation above, BSL could seek an amendment to the CCs for the WGCP and Gypsum Plant (i.e. CC # W-3.2, W-3.3 and G-3.4) to be consistent with CC # O-6.3. If this was done, then it would negate the requirement to make an EMP publicly available but would still ensure there is a requirement maintain the environmental and safety management systems for the WGCP and Gypsum Plant.</p>
<p>G-3.4 (Supercedes W-3.4)</p>	<p>The Applicant shall maintain and update the Environmental Management Plan referred to under condition 3.2 of this consent from time to time to reflect modifications to the development and any changes in the environmental management of the development. The Applicant shall make a current version of the Plan available for inspection by the Secretary upon request.</p>	<p>There is no standalone EMP for the Gypsum Plant. The example documents comprising the EMP that were sighted during the audit appear to have been maintained and updated (Refer to W-3.2 & G-3.2A above).</p>	<p>Compliant</p>	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
O-6.3	Prior to the commencement of recommissioning of the Ore Preparation area, the Proponent shall demonstrate to the satisfaction of the Secretary that it has updated environmental and safety management systems for the Steelworks to reflect the works subject of this Approval.	The scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases (Refer to Section 1.4). However, this CC has been assessed as 'Compliant' since it is marked as complete in the 2013 IEA and BSL has maintained the environmental and safety management systems (Refer to Section 4.1.1).	Compliant	
C. COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT / COMPLAINTS				
C.1 Provision of Information				
O-5.1	Subject to commercial confidentiality, the Proponent shall make all documents required under this approval available for public inspection on request.	In the 2013 IEA, this CC was interpreted to be only relevant to the construction phase, with provision of ongoing information addressed by CC # O-5.4 (See below). Therefore, it was marked as complete in the 2013 IEA. However, this CC does not appear to be only relevant to the construction phase. It could not be verified if there have been any specific requests for this information. However, it is noted that information for the OPUP is provided on the BSL website (See CC # O-5.4 below) and consultation is being provided through the Community Consultative Committee (Minutes are available at: http://bsi-illawarraweb-prod.elasticbeanstalk.com/community/community-consultative-committee/). Therefore, this CC has been assessed as 'Compliant'.	Compliant	
O-5.4	The Proponent shall publish and maintain up-to-date information on its website for the life of the project and include, but not necessarily be limited to: (a) a copy of the documents referred to under condition 1.1 of this approval, and any	It is reported in the acceptance letter from the DP&E for previous IEA (letter dated 5-Aug-16, copy provided) that: "A review of the BlueScope Steel website could not locate the documents as required by Condition 5.4 of PA 06_0229 MOD1. It is requested that the documents as required by this condition are uploaded to the website by 30 August	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>documentation supporting modifications to this approval that may be granted from time to time;</p> <p>(b) a copy of this approval and any modification to it and each relevant environmental 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 any audit in accordance with condition 4.1 of this approval.</p>	<p>2016, with a link being provided by email to the Department confirming that this has been completed”. The letter from BSL to DP&E (dated 24-Aug-18) was provided to confirm that information was uploaded to the website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/) by the due date.</p> <p>The information uploaded appears to address items (a), (b) and (d).</p> <p>Item (c) does not appear to have been specifically addressed. However, unlike the WGCP (Refer to CC # W-3.2) there is no requirement for a standalone EMP for OPUP (Refer to CC # O-6.3) and the plans referred to in the CCs for OPUP appear to be generally applicable to the construction phase (e.g. Construction Environmental Management Plan – Refer to CC #s O-6.1 and O-6.2) . Consultation is also being provided through the Community Consultative Committee (Minutes are available at: http://bsi-illawarraweb-prod.elasticbeanstalk.com/community/community-consultative-committee/). Therefore, this CC has been assessed as ‘Compliant’.</p>		
C.2 Systems for Receiving Complaints and Enquiries				
W-4.55	<p>Prior to the commencement of construction activities for the Waste Gas Cleaning Plant, the Applicant shall arrange:</p> <ul style="list-style-type: none"> a toll free number for the purpose of receiving any complaints from members of the public in relation to activities conducted at the site, unless otherwise specified in an environment protection licence issued by the EPA; and 	<p>Complaints are received via the general enquiries toll free number (1800 800 789), which can be found on the ‘Contact Us’ website page (http://www.bluescopesteel.com.au/our-company/contact-us).</p> <p>A complaint received by the switchboard is required to be forwarded to the Environment Department in accordance with the Divisional Complaints Procedure (MA-ENV-11-01, dated May 2016, copy provided).</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<ul style="list-style-type: none"> a postal address where written complaints can be lodged. <p>The Applicant must notify the public of the telephone number and postal address via an advertisement in the appropriate local newspaper prior to commencement of site preparation works. The telephone number and postal address shall be displayed near the entrance to the site, in a position visible from the nearest public road.</p>	<p>The complaint is recorded in MARS (Sighted "Complaint" tab in MARS which includes: list of complaints with Reference Number / Title / Received Date / Status - all noted to be marked as complete). Selecting a complaint provides more detail, including finding of investigation and actions. BSL will then go back to complainant as required. An example was sighted and appeared to be complete (No. C1258676, copy provided).</p> <p>BSL advised that they do occasionally receive complaints by post. The postal address can be found on the 'Contact Us' website page (http://www.bluescopesteel.com.au/our-company/contact-us).</p> <p>An advertisement was posted in newspaper (Dated 20 February 2008, copy provided).</p> <p>The telephone number and postal address are displayed at the entrance gate on Christy Drive (Refer to Photograph 8).</p> <p>Photograph 8 Sign Near Entrance on Christy Drive</p> 		

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
<p>W-A2.2 [Also EPL # M7.1 to M7.3]</p>	<p>The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.</p> <p>The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.</p> <p>This condition does not apply until three months after this condition takes effect.</p>	<p>Same as EPL # M7.1 to M7.3. Refer to CC # W-4.55 above.</p>	<p>Compliant</p>	
<p>O-5.2</p>	<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):</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>Refer to CC # W-4.55 above.</p> <p>BSL advised that it is very rare to receive complaint via email. There is no specific email address for complaints; however, an electronic submission can be made using the 'Enquiry Form' on the 'Contact Us' website page (http://www.bluescopesteel.com.au/our-company/contact-us).</p>	<p>Compliant</p>	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
C.3 Recording of Complaints and Follow-up Actions				
W-A2.1 [Also EPL # M6.1 to M6.4]	<p>The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies. The record must include details of the following:</p> <ul style="list-style-type: none"> the date and time of the complaint; the method by which the complaint was made; any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; the nature of the complaint; the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and if no action was taken by the licensee, the reasons why no action was taken. <p>The record of a complaint must be kept for at least four years after the complaint was made.</p> <p>The record must be produced to any authorised officer of the EPA who asks to see them.</p>	<p>Complaints are recorded in MARS (Sighted “Complaint” tab in MARS). Selecting a complaint provides more detail, including finding of investigation and actions. BSL will then go back to complainant as required. An example was sighted and appeared to be complete (ID C1258676, copy provided).</p> <p>Info recorded includes: reference number, title, date and time, method, personal details (unless an anonymous complaint is received), nature of complaint, action taken, status, etc.</p> <p>MARS is c. 7-8 yrs old so records have been maintained as required by this CC.</p> <p>Records since 1 January 2016 were sighted (Copy provided) and are summarised in Section 4.2.1.</p>	Compliant	
O-5.3	<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> <p>(a) the date and time, where relevant, of the complaint and enquiry;</p>	Refer to W-A2.1.	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<ul style="list-style-type: none"> (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 operational 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 Secretary upon request.</p>			

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
D. COMPLIANCE MONITORING AND REPORTING				
W-2.1	Throughout the life of the development, the Applicant must secure, renew, maintain, and comply with all the relevant statutory approvals applying to the development.	<p>It is difficult to verify compliance with all aspects of this CC with the scope of the IEA; however, it has been assessed as 'Compliant' based on the following:</p> <ul style="list-style-type: none"> BSL has a current EPL licence (EPL 6092, dated 4-Dec-18, copy provided), which is available on the EPA website. There have been variations to the EPL to accommodate the bypass of the Sinter Plant WGCP Stack and the ACU trial (Refer to Appendix B.2). There have been regular EPL variations (typically every c. few months). BSL actively monitors compliance with these CCs (Refer to CC # W-A1.1). Relatively few non-compliances with the CCs have been identified in this, and previous, IEAs. 	Compliant	
W-2.2	The Applicant must ensure that all contractors and sub-contractors are aware of, and comply with, the conditions of this consent and the approved Construction Management Plan (see Condition 3.1).	<p>The scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases (Refer to Section 1.4). Also, CC # W-3.1 was deleted from DA No 26-02-01, MOD 2 in May 2016 (Refer to Section 1.1.1).</p> <p>Contractors are audited with compliance tracked by BSL on a monthly basis. An example monthly compliance report was provided for SCE Industrial Services (Nov-18), which lists examples of the actions / evidence required to demonstrate compliance with EPL licence requirements (e.g. training in place). Whilst this does not directly reference the consent conditions, it does appear to address the specific environmental issues relevant for the contractor's operations (dust, noise, etc.) and can be related back to the consent conditions via the equivalent condition in the EPL</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		(e.g. CC # W-4.6, which relates to noise, is essentially the same as EPL # L6.5 & L6.6).		
W-2.3	Prior to construction on any aspect of the development commencing, the Applicant must certify in writing, to the satisfaction of the Secretary , that it has obtained all the necessary statutory approvals for the construction works, and complied with all the relevant conditions of this consent and/or any other statutory requirements for this development pertaining to that aspect of the development to be constructed.	The scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases (Refer to Section 1.4).		
W-2.4	Prior to commencement of operations of the development, the Applicant must certify in writing, to the satisfaction of the Secretary , that it has obtained all the necessary statutory approvals for operations, and complied with all the relevant conditions of this consent and/or any other statutory requirements for this development.	The scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases (Refer to Section 1.4).		
E. ENVIRONMENTAL STANDARDS AND CONDITIONS				
E.1 Hours of Operation				
W-4.2	DELETED.	Refer to EPL # L6.2 and L6.3.		
W-4.3	DELETED.			
W-4.4	DELETED.			
E.2 Noise – Construction Phase				
W-4.5	DELETED.			
O-2.8	DELETED.			


CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
E.3 Noise – Operations Phase				
W-4.2	<p>The Applicant shall install and operate equipment in line with best practice to ensure that the development complies with the noise limits specified in condition 4.6. The Applicant shall undertake noise monitoring as required by the EPA in the EPL for the site.</p>	Refer to CC # W-4.6.	Compliant	
W-4.6 [Also EPL # L6.5 & L6.6]	<p>During operation, noise from the Waste Gas Cleaning Plant must not exceed at any time an LA10 (15 minute) noise emission criterion of 70 dB(A) when measured at those sites nominated in the figure accompanying the fax from the Applicant of 10 April 2001 titled 'Relocation of Noise Monitoring Reference Point'.</p> <p><i>Note: For the purpose of noise measures for Condition 4.6, the LA10 noise level must be measured or computed at the sites nominated, over a period of 15 minutes using "FAST" response on the sound level meter.</i></p> <p>Note: EPL # L6.6 is as follows:</p> <p><i>For the purpose of the noise measurements referred to in condition L6.5, 5dB(A) must be added to the measured level if the noise is substantially tonal and impulsive in character.</i></p> <p><i>Noise monitoring must use the "FAST" response on the sound level meter.</i></p> <p><i>Note: Noise impacts that may be enhanced by temperature inversions shall be addressed by:</i></p> <p>a) <i>documenting noise complaints received to identify any higher level of impacts or patterns of temperature inversions; and</i></p>	<p>This is essentially the same as specified in EPL # L6.5. The EPL notes that the EPA approved monitoring site is nominated in the plan titled "Figure 4 – Layout of Proposed Sinter Plant Waste Gas Cleaning Plant" 281963A6". This is the Gabriella Memorial site on Christy Drive. Note: The memorial has subsequently been relocated; however, the noise monitoring is still undertaken at the original location in accordance with EPL # L6.5.</p> <p>BSL advised that multiple noise reports have been submitted to the DP&E and have demonstrated compliance with this condition over multiple years with no noise complaints. The most recent survey report was sighted (By SLR Consulting Australia Pty Ltd, dated 7-Feb-19, copy provided), which showed compliance with the 70 DB(A) noise criterion. It is reported that the noise is not "substantially tonal or impulsive".</p> <p>BSL has not recorded any noise complaints since the previous IEA in 2016 (Refer to Section 4.2.1) and noise was not identified as a concern during consultation prior to the audit (Refer to 2.3.1).</p>	Compliant	


CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<i>b) where levels of noise complaints indicate a higher level of impact then actions to quantify and ameliorate any enhanced impacts under temperature inversions conditions should be developed and implemented.</i>			
W-4.7	Noise impacts that may be enhanced by temperature inversions shall be addressed by: <ul style="list-style-type: none"> documenting noise complaints received to identify any higher level of impacts or patterns of temperature inversions; and where levels of noise complaints indicate a higher level of impact then actions to quantify and ameliorate any enhanced impacts under temperature inversions conditions should be developed and implemented. 	BSL has not recorded any noise complaints since the previous IEA in 2016 (Refer to Section 4.2.1) and noise was not identified as a concern during consultation prior to the audit (Refer to Section 2.3.1).	Compliant	
O-2.9	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 $L_{Aeq(15\text{ minute})}$. 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.	The scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases. However, this CC has been marked as complete in the 2013 IEA for the construction phase. BSL has not recorded any noise complaints since the previous IEA in 2016 (Refer to Section 4.2.1) and noise was not identified as a concern during consultation prior to the audit (Refer to Section 2.3.1). The EPL does not currently nominate a location or dB(A) limit for monitoring noise at the nearest affected residence.	Compliant	
O-2.10	For the purpose of assessment of noise contributions specified under condition 2.9 of this consent, noise from the project shall be:	BSL advised that this has been superseded by an agreed noise monitoring program with EPL, which is reflected by EPL condition # L6.	Compliant	


CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>a) measured at the most affected point on or within the site boundary at the most sensitive receiver to determine compliance with $L_{Aeq(15 \text{ minute})}$ night noise limits;</p> <p>b) measured at one metre from the dwelling facade to determine compliance with $L_{A1(1 \text{ minute})}$ 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.</p> <p>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 11 of the New South Wales Industrial Noise Policy (EPA, 2000), where applicable.</p> <p>Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Secretary prior to the implementation of the assessment method.</p>	<p>The only monitoring site listed in the EPL (Condition # L6) is the location nominated in the plan titled “Figure 4 – Layout of Proposed Sinter Plant Waste Gas Cleaning Plant” 281963A6”. This is located on Christy Drive (Refer to Figure 1, Grid Reference N25). The specified $L_{Aeq(15 \text{ minute})}$ noise limit is 70 DB(A).</p> <p>The EPL does not currently nominate a location or DB(A) limit for monitoring noise at the nearest affected residence.</p> <p>The scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases. However, this CC has been marked as complete in the 2013 IEA for the construction phase (Refer to Section 1.4).</p> <p>BSL has not recorded any noise complaints since the previous IEA in 2016 (Refer to Section 4.2.1) and noise was not identified as a concern during consultation prior to the audit (Refer to 2.3.1).</p>		
E.4 Air Quality – Construction Phase				
W-4.8	DELETED.			
W-4.9	DELETED.			
E.5 Air Quality – Operations Phase				
W-4.10	The Applicant must operate the Waste Gas Cleaning Plant in a proper and efficient manner with the objective of preventing air pollution.	This broad, objective-based, Consent Condition (CC), is difficult to assess in isolation and is therefore addressed through the assessment of compliance with the other CCs and the conditions of the EPL (i.e. As summarised in Section 4.3.2 of this report).	Refer to relevant CCs below	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
O-2.1	<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>BSL has not recorded any odour complaints for the Sinter Plant (Including the OPUP) since the previous IEA in 2016 (Refer to Section 4.2.1).</p> <p>Note: This facility is not generally a source of odour emissions, which is evidenced by the absence of specific odour limits in the EPL.</p>	Compliant	
W-4.11 [Also EPL # O4.16]	<p>The Waste Gas Cleaning Plant must be designed and operated so that there should be no visible emissions from the Waste Gas Cleaning Plant exhaust stack under normal operations.</p> <p><i>Note: Normal operation excludes the first two-hours of operation following start up.</i></p>	<p>EPL # O4.16 is as follows: <i>The WGCP must be operated so that there are no visible emissions from the exhaust stack (Discharge Point 107) under normal operations. Compliance with this requirement is to be assessed against compliance with the EPL limit condition for Discharge Point 107 of 20 mg/Nm³ for particulate matter.</i></p> <p><i>Note: Normal operation excludes the first two hours of operation following start up.</i></p> <p>Therefore, EPL # O4.16 is similar to CC # W-4.11 but adds a 20 mg/Nm³ criterion for particulate matter to enable an assessment of 'visibility'.</p> <p>There has been only one report of a visible emission from the WGCP stack since the previous IEA in 2016 (Refer to Section 4.2.1). This complaint was initially received by the EPA, who then advised BSL. The complaint is recorded in the BSL system (No. C1258676, dated 1-Dec-17, copy provided) and was also reported in the Community Consultative Committee minutes for 22-Mar-18. BSL's investigation revealed that the Continuous Emission Monitor (CEM) measurement was 3-5 mg/Nm³ which is less than limit in the EPL (20 mg/Nm³).</p> <p>BSL monitor compliance through continuous and quarterly stack testing, as required to comply with EPL # O4.16 and the use of cameras. Stack testing results were sighted for:</p>	Non-Compliant (CC # W-4.11)	<p>2019/2 – Emissions from the WGCP may be visible despite complying with the relevant condition from the EPL for the WGCP Stack (EPL Point 107). Consequently, the operation of the WGCP Stack (EPL Point 107) may be non-compliant with Consent Condition No. 4.11 for the WGCP, despite being compliant with EPL Condition No. O4.16. This inconsistency should be resolved with the DP&E and EPA (e.g. by amending the relevant conditions).</p>

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<ul style="list-style-type: none"> • March 2016 to December 2018 via the 'EHS Data Monitor Pro' web-based application (Copy provided). • March 2016 to February 2019 on the 'NSW Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2019-nsw-monitoring-data/). <p>The reported monitoring results for the WGCP stack confirm a total particulate matter measurement less than the 20 mg/Nm³ criterion.</p> <p>The continuous monitoring reading at the control room was also sighted during the site inspection on 1 March 2019 and was observed to be 2 mg/Nm³ at the outlet (Refer to Photograph 5 in Section 3.6).</p> <p>It is noted that compliance with the 20 mg/Nm³ criterion does not necessarily mean that the emissions are not visible. Actions were included in the 2013 and 2016 IEAs to investigate and resolve this apparent inconsistency but do not appear to have been closed and a visible emission has been reported since the previous IEA in 2016. Therefore, this has been assessed as a 'Non-Compliance' with W-4.11, despite being 'Compliant' with EPL # O4.16.</p>		
W-4.12 [Also EPL # O3.1]	The Waste Gas Cleaning Plant must be installed and operated with the objective of preventing visible dust emissions from materials handling, plant, equipment and associated operational activities. All areas in or on the premises must be maintained in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust, using the measures proposed in the SEE.	<p>During the site inspection on 1 March 2019, the WGCP was observed to be maintained in a manner that minimises dust generation. For example:</p> <ul style="list-style-type: none"> • The roadways appeared to have been swept by the mobile sweepers, with relatively little surface dust build up (Refer to Photograph 9). • There were no obvious dust emissions from plant or equipment at the WGCP. 	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>Note: EPL # O3.1 is as follows: <i>Activities occurring at the premises must be carried out in such a manner that fugitive dust emissions from the activities are minimised.</i></p>	<ul style="list-style-type: none"> The reading for the continuous total particulate monitoring device on the WGCP stack, which is displayed in the control room, was relatively low (Refer to Photograph 5 in Section 3.6). <p>Photograph 9 Roadways at WGCP (1 March 2019)</p> 		
<p>W-4.13 & O2.6</p>	<p>The Applicant shall install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria and air quality monitoring requirements as specified in the EPL for the site.</p>	<p>Also refer to Appendix B.2. This has been categorised as ‘Non-Compliant’ since there have been exceedances of EPL limits since the previous IEA in 2016 (Also refer to Section 4.2.1).</p>	<p>Non-Compliant</p>	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
<p>O-2.2 [Also EPL # 03.1]</p>	<p>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> <p>Note: EPL # 03.1 is as follows: <i>Activities occurring at the premises must be carried out in such a manner that fugitive dust emissions from the activities are minimised.</i></p>	<p>During the site inspection on 1 March 2019, the Sinter Plant was observed to be maintained in a manner that minimises dust generation. For example:</p> <ul style="list-style-type: none"> Water carts were observed to wet down roads. Roadways appeared to have been swept by the mobile sweepers, although some surface dust was evident. For example: <ul style="list-style-type: none"> The roadway between the Sinter Plant offices and the Sinter Plant building did not appear to have been recently swept or wetted down (Refer to Photograph 10). <p>Photograph 10 Roadway Near Offices at Sinter Plant (1 March 2019)</p>  <ul style="list-style-type: none"> A truck was observed being loaded with waste material and some dust was evident on the roadway. Whilst it appeared to be at the lower end 	<p>Non-Compliant</p>	<p>2019/3 – The roadway between the Sinter Plant offices and the Sinter Plant building should be routinely swept or wetted down to minimise the generation of windblown and traffic generated dust.</p>

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<p>of the Dust Emission Ranking (DER) system in the FDMS (i.e. DER < 3), it did not appear to have been recently wetted down or swept (although the nearby road appeared to have been). (Refer to Photograph 11).</p> <p>Photograph 11 Truck and Roadway at Sinter Plant (1 March 2019)</p>  <ul style="list-style-type: none"> • Although there was some dust observed inside the Sinter Plant building, this building is vented to the Sinter Machine Room Dedusting System (Refer to Section 3.2.4). • There were no obvious dust emissions from plant or equipment at the Sinter Plant outside the main building. <p>This was assessed as being 'Non-Compliant' since the roadway area near the offices at the Sinter Plant was</p>		

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<p>observed to be in a similar condition during the previous IEA in 2016 (Refer to Section 4.3.5). This area is shielded by the Sinter Plant building (i.e. is less likely to be a source of an off-site dust emission); however, it should still be routinely swept.</p>		
<p>O-2.3 [Also EPL # O3.4]</p>	<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, except during loading and unloading. Any such vehicles shall be covered or enclosed in a manner that will prevent emissions of dust from the vehicle at all times, to the extent practicable.</p> <p>Note: EPL # O3.4 is as follows: <i>All trucks carrying dry bulk material that are loaded on the premises must be loaded and operated so as to prevent spillage of any material from the load which generates dust.</i> <i>For the purposes of this Condition "load is defined as material contained within the body/trailer/bin of the truck and on the gunnels of the truck.)</i></p>	<p>Dust emissions are required to be managed in accordance with the Fugitive Dust Management System (FDMS) (Divisional procedure MA-ENV-02-02, dated February 2018, copy provided).</p> <p>BSL advised that it is not compulsory for trucks to be covered within the site, with controls applied on a case-by-case basis (i.e. a truck may be covered if it is identified as a source of potential dust emissions). However, it is reported in the FDMS that "Every dry bulk material loaded truck must be covered before leaving the PKSW site".</p> <p>BSL would appear to have a system to manage potential dust emissions from vehicles and BSL has not recorded any complaints regarding dust emissions from the vehicles associated with the Sinter Plant (Refer to Section 4.2.1).</p> <p>Although it was not possible to verify all requirements of this CC within the scope of this audit, it has been categorised as 'Compliant' based on the evidence sampled.</p>	<p>Compliant</p>	
<p>O-2.4</p>	<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>Dust emissions are required to be managed in accordance with the Fugitive Dust Management System (FDMS) (Divisional procedure MA-ENV-02-02, dated February 2018, copy provided).</p> <p>BSL has not recorded any complaints regarding dust emissions beyond the boundary of the site (Refer to Section 4.2.1).</p>	<p>Compliant</p>	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		There we no obvious visible dust emissions beyond the boundary of the site during the site inspection on 1 March 2019.		
O-2.5	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 Secretary .	During the site inspection on 1 March 2019, the majority of the internal roads, trafficable areas and manoeuvring areas at the Sinter Plant were observed to be sealed. Only the car parking area near the Sinter Plant offices was not sealed and water carts were observed wetting down this area to minimise the potential for dust generation.	Compliant	
W-4.14	The Applicant must operate the Waste Gas Cleaning Plant with an objective of maximising the destruction of Dioxin and related substances.	BSL advised that destruction of dioxins is maximised by operating the regenerator with a char temperature of at least 400 deg. C and a char recirculation rate that does not exceed 17.5 tonnes per hour. The current operating conditions were discussed during the site inspection. BSL advised that the hot gas regenerator is operated with a set-point temperature of 410 deg. C and a recirculation rate of c. 11 tph when operating 4 out of 5 of the Adsorbers (Sighted on DCS). However, this can increase to c. 17 tph when operating with 4 out of 5 of the Adsorbers if there are losses due to operational reasons. Monitoring results from 'EHS Monitor Pro' for dioxins at the WGCP stack (Data provided for March 2016 to December 2018) indicate that dioxins are well below the EPL limit of 0.3 ng/m ³ .	Compliant	
W-4.15	DELETED.			
W-4.16	DELETED.			
W-4.17	DELETED.	Refer to EPL # L3.1 to L3.4.		
W-4.18	DELETED.	Refer to EPL # L2.4.		

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
W-4.19	DELETED.			
O-2.7	DELETED.			
E.6 Sulphur Rich Gas Management				
W-4.20	The Applicant is not permitted to use SRG for fertiliser production without the prior approval of the EPA. In seeking approval of the EPA, the Applicant shall prepare a detailed proposal that includes its consultation with NSW DPI and NSW Health.	BSL advised that this CC has not been triggered since all SRG is converted to gypsum for cement manufacture.	Not Triggered	
W-4.21	DELETED.			
G-4.21A	The Applicant shall construct the gypsum plant the subject of modification application MOD-50-4-2005-i and shall operate that plant so as to accept and react the maximum practicable quantity of sulfur rich gas generated within the development.	BSL track 'SRG availability' (i.e. availability of Gypsum Plant) and a monthly summary report (Excel spreadsheet) is submitted to the EPA, which includes the status of the regenerator, SRG plant, Ammonia storage and CEM. An example report was sighted for January 2019 (copy provided). This includes the % availability of the SRG plant for month to date (Reported to be 92.2% for January 2019). This has been assessed as an 'Compliant' since BSL appear to be attempting to operate the plant to ensure maximum <i>practicable</i> recovery and are self-reporting to the EPA when SRG recovery is not available (Refer to Section 4.2.1).	Compliant	
G-4.21B	All off-gas from the gypsum plant the subject of modification application MOO-50-4-2005-i shall be discharged to atmosphere through the Sinter Plant, Waste Gas Cleaning Plant Exhaust Stack (refer to condition 4.17 of this consent).	BSL advised that this is hard piped to the WGCP exhaust stack. No evidence of a direct emission of off-gas from the gypsum plant to atmosphere was observed during the site inspection.	Compliant	
W-4.22	The Applicant must implement measures to minimise the potential for air pollution that may be caused by venting of sulfur rich gas (SRG) to atmosphere.	Refer to CC # G-4.21A above.	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
W-4.23	DELETED.			
W-4.24	DELETED.			
W-4.25	DELETED.	Refer to EPL # O4.18.		
W-4.26	DELETED.			
W-4.27	DELETED.			
E.7 Wastewater Treatment Plant				
W-4.28	DELETED.			
E.8 Blowdown Water Reuse Strategy				
W-4.29	DELETED.			
E.9 Pollution of Waters				
W-4.30	The premises and activities carried out therein must not pollute surface or groundwater except as specified in the EPL for the premises.	<p>The EPL includes requirements for a Groundwater Monitoring Program; however, this does not appear to relate to the Sinter Plant (Including WGCP and Gypsum Plant).</p> <p>The stormwater / process water collection / treatment facilities for the Sinter Plant (including the IMED) were observed during the site inspection on 1 March 2019 and no deficiencies were observed. Operational areas (including roadways) appeared to be sealed and DGs were stored in bunded areas, thereby limiting the potential for pollution of groundwater.</p> <p>This CC has been assessed as 'Non-Compliant' due to the exceedance of the limit for total iron at EPL Point 89 (IMED). A recommendation has not been included as no further exceedances have been recorded since July 2016 and the subsequent completion of the IMED Drainage Diversion</p>	Non-Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		Project (PRP 176) is expected to mitigate similar incidents (Refer to Section 4.2.2).		
W-4.31	The Applicant shall ensure that all licensed surface water discharges from the site comply with the discharge limits (volume and quality) set for the development in any EPL or the relevant provisions of the POEO Act.	This CC has been assessed as 'Non-Compliant' due to the exceedance of the limit for total iron at EPL Point 89 (IMED). A recommendation has not been included as no further exceedances have been recorded since July 2016 and the subsequent completion of the IMED Drainage Diversion Project (PRP 176) is expected to mitigate similar incidents (Refer to Section 4.2.2).	Non-Compliant	
E.10 Erosion and Sediment Control				
W-4.32 & G-4.32	DELETED.			
E.11 Stormwater Management				
W-4.33	Prior to construction, the Applicant must prepare a detailed Stormwater Management Plan for the site, which has been prepared in consultation with the EPA and Council, to mitigate the impacts of stormwater runoff from the development and its operations. The plan should be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared for the catchment, the plan should be consistent with the guidance contained in "Managing Urban Stormwater: Council Handbook" (available from the EPA). The plan shall be submitted for approval as part of the Construction Management Plan (see Condition 3.1).	The scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases (Refer to Section 1.4). However, this CC has been assessed as 'Compliant' since it is marked as complete in the 2013 IEA.	Compliant	
W-4.34	As part of the Stormwater Management Plan outlined in Condition 4.33, the Applicant must document and implement measures that will minimise the discharge of	Stormwater from the Sinter Plant area (Including WGCP and Gypsum Plant) is directed to the 4BF Thickener for clarification before discharge to the IMED.	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>pollutants from the Waste Gas Cleaning Plant during wet weather and to meet Licence Limit conditions for wet weather detailed in the EPL.</p>	<p>Wet weather conditions are defined in the EPL as “weather conditions in which ten or more millimetres of rain falls within a 24-hour period”. Some licenced discharge points in the EPL require a sample to be taken following a rainfall event of more than 10mm in a 24-hour period (if this condition is met).</p> <p>Completion of the IMED diversion project, and increasing the weir height, should significantly reduce the likelihood of discharge directly from the IMED during wet weather and there has been no reported discharge directly from the IMED since May 2017 (Refer to Section 4.2.2).</p> <p>The stormwater / process water collection / treatment facilities for the Sinter Plant (including the IMED) were observed during the site inspection on 1 March 2019 and no deficiencies were observed.</p>		
O-2.11	<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>	<p>The scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases (Refer to Section 1.4). However, this CC is marked as complete in the 2013 IEA.</p> <p>The stormwater / process water collection / treatment facilities for the Sinter Plant (including the IMED) were observed during the site inspection on 1 March 2019.</p> <p>Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED diversion project should significantly reduce the likelihood of any particulates or debris being discharged off-site (Refer to Section 4.2.2).</p>	Compliant	
O-2.12	<p>Except as may be expressly provided under the provisions of an Environment Protection Licence for the project, the Proponent shall comply with section 120 of</p>	<p>Section 120 of the POEO Act relates to the prohibition of the pollution of waters and a person who pollutes any waters is guilty of an offence.</p>	Non-Compliant	


CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>the Protection of the Environment Operations Act 1997 which prohibits the pollution of waters.</p>	<p>Monitoring data is reported monthly on the 'NSW Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2019-nsw-monitoring-data/).</p> <p>As at 17 April 2019, the website was observed to include monthly reports for April 2012 to February 2019. These reports indicate compliance with the EPL discharge limits at EPL Point 89 (IMED) except for one exceedance of the total iron limit (maximum reading of 50 mg/l) in July 2016. This exceedance was attributed to the unblocking of two stormwater drains which resulted in increasing stormwater flows into these drains and the discharge of water with elevated iron levels into the IMED (Refer to Section 4.2.1). BSL advised that this incident did not result in any discolouration, and/or contribute to environmental harm, in the Port Kembla harbour receiving waterway.</p> <p>This CC has been assessed as 'Non-Compliant' due to the exceedance of the limit for total iron at EPL Point 89 (IMED). A recommendation has not been included as no further exceedances have been recorded since July 2016 and the subsequent completion of the IMED Drainage Diversion Project (PRP 176) is expected to mitigate similar incidents (Refer to Section 4.2.2).</p> <p>The stormwater / process water collection / treatment facilities for the Sinter Plant (including the IMED) were observed during the site inspection on 1 March 2019 and no deficiencies were observed.</p>		
E.12 Soil Remediation				
W-4.35	DELETED.			
W-4.36	DELETED.			

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
E.13 Radionuclides				
W-4.37	The Applicant must operate the Waste Gas Cleaning Plant with an objective of minimising levels of radionuclides emitted in water discharges and air emissions (particulate and gaseous phase) from the Waste Gas Cleaning Plant.	<p>It is reported in an earlier notice of variation to the EPL licence (Notice No. 1110309, File Number 280032, dated 19-Mar-2010, copy available on EPA website) that:</p> <p><i>The aim of PRP 113 (SMERP – Radionuclide Monitoring Program) was to ensure the SMERP is operated with an objective of minimising levels of radionuclides emitted in water discharges and air emissions (particulate and gaseous phase) from the SMERP.</i></p> <p>1. <i>No later than the 11 August 2003 the Licensee must develop and implement a radionuclide monitoring program that demonstrates how the Licensee will comply with the aim of this PRP.</i></p> <p><i>The program must include details on but need not necessarily be limited to the following:</i></p> <ul style="list-style-type: none"> <i>a) monitoring methodologies and standards to be employed to assess radionuclides and their pathways in any air emissions and water discharges during plant operations;</i> <i>b) radionuclide species;</i> <i>c) monitoring location(s);</i> <i>d) monitoring frequency;</i> <i>e) representativeness of the sampling;</i> <i>f) assessment of results, including Australian and International Standards;</i> <i>g) reporting;</i> <i>h) process description and variability;</i> <i>i) issues relevant to particle size distribution of particulate materials and</i> 	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<p><i>j) opportunities to integrate with other monitoring programs.</i></p> <p>2. <i>After hot commissioning (11 August 2003) the applicant must implement the program referred to above to provide information and data for at least the first 12 months of operation on whether the Licensee is complying with the aim of this PRP.</i></p> <p>3. <i>The Licensee must prepare and submit a report to the EPA no later than 31 December 2009 on the findings of the Radionuclide Monitoring Program. The licence may be varied subject to the findings and recommendations of the program.</i></p> <p>This CC has been assessed as 'Compliant' since PRP 113 is marked as complete in the current EPL (Completed December 2009), there are no limits included in the current EPL that specifically relate to radionuclides, and the CC is marked as complete in the 2013 IEA (Refer to Section 1.4).</p>		
E.14 Spillage Response				
W-4.38	<p>Prior to hot commissioning measures must be developed and implemented to minimise the environmental impact of incidents involving spillage of materials such as waste dusts and char. The measures must include but should not necessarily be limited to those for immediate cleaning of the site and reporting.</p>	<p>During the previous IEA in 2016, some bags of spent char were observed to be damaged on the roadway near the Gypsum Plant. No bags of spent char were observed to be stored on site during the site inspection on 1 March 2019.</p> <p>Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED diversion project should significantly reduce the likelihood of any particulates or debris being discharged off-site (Refer to Section 4.2.2).</p>	Compliant	

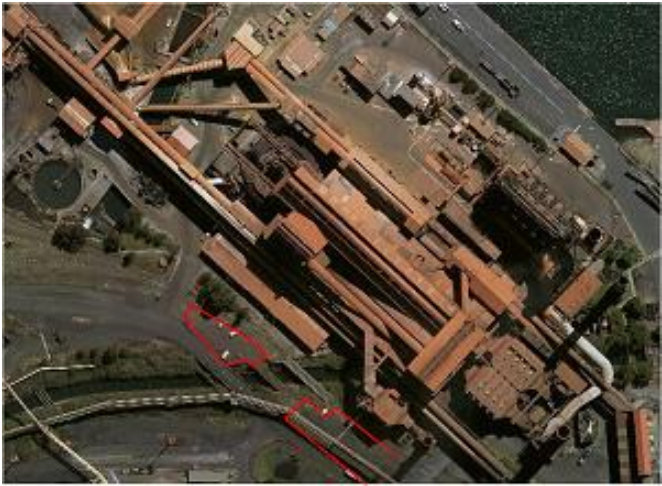
CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
E.15 Waste Generation and Management				
W-4.39	<p>The Applicant must prepare and implement a Waste Management Plan for the development in consultation with the EPA and Council. This plan must describe in detail the waste management system, including:</p> <ul style="list-style-type: none"> the types and quantities of waste which will be generated at the site; how waste will be stored on-site, transported, and disposed of off-site; management measures to sort, reuse or recycle materials. <p>The Waste Management Plan prepared must be approved by the Secretary prior to commissioning of the development.</p>	<p>It is reported in the 2016 IEA report that “it is reported in BSL’s Annual Environmental Management Report (Dated 4 October 2013, copy provided) that the Waste Management Plan was sent to the Office of Environment and Heritage, Council and the Department of Planning in c. January - March 2003 and approved by the Department of Planning on 13 May 2003 (Dept. Ref. SOO/01294 – not verified)”.</p> <p>This CC has been assessed as ‘Compliant’ since:</p> <ul style="list-style-type: none"> The waste register for the coke and ironmaking department was sighted (copy not provided) and appeared to confirm that the waste has been classified (Refer to CC # W-4.41 below). The Ore Prep Waste Management Plan was sighted in Documentum (dated May 2018, copy not provided). This includes a waste register and classification information together with some improvement actions. Segregation of waste materials into dedicated waste storage skips was observed on site during the site inspections on 1 March 2019 (Refer to CC # O-2.13 below). 	Compliant	
W-4.40	<p>After reviewing the Waste Management Plan, the Secretary may require the Applicant to address certain matters identified in the plan. The Applicant must comply with any reasonable requirements of the Secretary.</p>	<p>It is reported in the 2016 IEA report that “it is reported in BSL’s Annual Environmental Management Report (Dated 4 October 2013, copy provided) that the Waste Management Plan was sent to the Office of Environment and Heritage, Council and the Department of Planning in c. January - March 2003 and approved by the Department of Planning on 13 May 2003 (Dept. Ref. SOO/01294 – not verified)”.</p> <p>This CC has been assessed as ‘Compliant’ since this CC is marked as complete in the 2013 IEA (Refer to Section 1.4).</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
W-4.41	All liquid and/or non-liquid waste generated on the site shall be assessed and classified in accordance with Waste Classification Guidelines (Department of Environment, Climate Change and Water, 2009), or any superseding document.	To comply with the divisional procedure, if a waste has not previously been classified, or there is evidence that the nature or concentration of contaminants in the waste have changed since it was previously classified, the waste must be sampled and analysed to determine the correct waste classification (<i>Management of Waste Material</i> , DIV-AR-RS-01, dated July 2018, copy provided). The EPA's Waste Classification Guidelines are referenced in the divisional procedure. The waste register for the coke and ironmaking department was sighted (copy not provided) and appeared to confirm that the waste has been classified.	Compliant	
W-4.42	The Applicant must implement measures to minimise or eliminate the amount of non-liquid waste requiring disposal.	Segregation of waste materials into dedicated waste storage skips was observed on site during the site inspections on 1 March 2019 (Refer to CC # O-2.13). If no recycling option exists for the material within BSL, then the divisional procedure requires identification of re-cycling options outside the company (<i>Management of Waste Material</i> , DIV-AR-RS-01, dated July 2018, copy provided). BSL is currently undertaking trials to determine if waste char can be recycled (Refer to Section 4.2.2).	Compliant	
W-4.43	DELETED.			
W-4.44	DELETED.			
O-2.13	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 scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases (Refer to Section 1.4). However, this CC has been assessed as 'Compliant' since this was addressed as part of PRP 114 (SMERP – Waste Management Program), which was sighted	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<p>as being complete in the EPL (Completed June 2007), and the CC is marked as complete in the 2013 IEA.</p> <p>Segregation of waste materials into dedicated waste storage skips was also observed on site during the site inspection on 1 March 2019 (Refer to Photograph 12).</p> <p>Photograph 12 Waste Storage Bins (1 March 2019)</p> 		
<p>O-2.14 [Also EPL # L5.1]</p>	<p>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.</p> <p>Note: EPL # L5.1 is as follows: <i>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.</i></p>	<p>EPL # L5.1 includes the list of permitted wastes.</p> <p>BSL advised that it is not normal to receive wastes generated from off-site and that this has not occurred since the 2016 IEA. Although not verifiable, this has been categorised as compliant since the Sinter Plant (including WGCP and Gypsum Plant) do not appear to have the capacity to process external waste and no evidence of such materials was sighted during the site inspection on 1 March 2019.</p>	<p>Compliant</p>	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p>			
O-2.15	<p>All liquid and/or non-liquid waste on the site shall be assessed and classified in accordance with Waste Classification Guidelines (Department of Environment, Climate Change and Water, 2009), or any superseding document.</p>	<p>To comply with the divisional procedure, if a waste has not previously been classified, or there is evidence that the nature or concentration of contaminants in the waste have changed since it was previously classified, the waste must be sampled and analysed to determine the correct waste classification (<i>Management of Waste Material</i>, DIV-AR-RS-01, dated July 2018, copy provided). The EPA's Waste Classification Guidelines are referenced in the divisional procedure.</p> <p>The waste register for the coke and ironmaking department was sighted (copy not provided) and appeared to confirm that the waste has been classified.</p>	Compliant	
E.16 Roads and Traffic				
W-4.45	<p>All chemicals being transported to the site must follow the route set out in the SEE.</p>	<p>It is identified in the 2016 IEA that the route specified in the 'Loading of Ammonia from Road Tanker' procedure did not appear to match the route specified in the 2002 transport study (which was supplied by BSL as defining the route set out in the SEE – Since the SEE was not provided, it is not clear if this transport study is consistent with the SEE) and that the route specified in the transport study pre-dates the construction of the M7, which appears to be used by Ammonia tanker drivers. BSL confirmed that there is still an</p>	Non-Compliant	<p>2019/4 – BSL should ensure compliance with the transport routes set out in the SEE for: (i) <u>all</u> chemicals transported to the site (CC # W-4.45); and (ii) non-liquid waste from the site (CC # W-4.46).</p>

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<p>inconsistency between the routes used and those specified in the SEE.</p> <p>This was identified as a low risk non-compliance in the 2016 IEA since following main roads such as the M7 rather than the more populated Cumberland Highway would be expected to be preferable for the transport of ammonia. The recommendation from the previous IEA is still open (Refer to Section 4.3.5).</p> <p>This was again categorised as being non-compliant, although it is noted that transport of ammonia has decreased significantly (Refer to Section 4.1.2).</p>		<p>Alternatively, BSL should seek approval for alternative routes to be followed (e.g. approved primary route/s and alternative routes when a primary route is unavailable).</p>
W-4.46	<p>The transport route for the non-liquid waste leaving the site must follow the route set out in Figure 5.4 of the SEE.</p>	<p>As there is some uncertainty regarding the transport of chemicals to the site (Refer to CC # W-4.46), it would also be appropriate for BSL to ensure compliance with the transport routes for non-liquid waste leaving the site.</p>	Non-Compliant	Refer to 2019/4.
W-4.47	<p>The developer must ensure that sufficient parking is provided on site for all vehicles associated with the construction and operation of the plant.</p> <p>No vehicles associated with the proposed development are to park along Christy Drive or Old Port Road.</p>	<p>BSL advised that two additional car parks were provided outside the Sinter Plant Administration Building to ensure sufficient parking is available for contractors and BSL employees (Refer to Figure 6).</p> <p>However, vehicles are still parked near the gate on Christy Drive. It is unclear whether the restriction on parking along Christy Drive was only intended to apply during the construction phase (when many more vehicles would be present) or whether this was meant to be an ongoing restriction. This should be raised with the DP&E and resolved accordingly.</p>	Non-Compliant	<p>2019/5 – Vehicles are being parked near the gate on Christy Drive. This would appear to be non-compliant with CC # W-4.47; however, it is not clear if this restriction was only intended to apply during the construction phase (when many more vehicles would be present) or whether this was meant to be an ongoing restriction. This should be raised with the DP&E and resolved accordingly.</p>

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<p align="center">Figure 6 Car Parking Areas at Sinter Plant</p> 		
W-4.48	<p>The developer must consult with the relevant authorities (i.e. Council, Roads and Traffic Authority and WorkCover) regarding the transportation of heavy equipment, wide loads and hazardous goods prior to the planned transport event.</p>	<p>The scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases (Refer to Section 1.4). This CC has been assessed as ‘Compliant’ since it is marked as complete in the 2013 IEA.</p>	Compliant	
E.17 Site Management				
W-4.49	<p>Stockpiles of sand, gravel, soil and the like must be located to ensure that the material:</p> <ul style="list-style-type: none"> • does not spill onto the road pavement; and • is not placed in drainage lines or water courses, and cannot be washed into these areas. <p>If soil or other materials are spilled accidentally onto the road or gutter, they must be removed prior to the completion of the day's work.</p>	<p>During the site inspection on 1 March 2019, the majority of the drains and roadways at the WGCP were observed to be clear of stockpiles of sand, gravel, soil and the like.</p> <p>During the previous IEA in 2016, some bags of spent char were observed to be damaged on the roadway near the Gypsum Plant. No bags of spent char were observed to be stored on site during the site inspection on 1 March 2019.</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<p>Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED diversion project should significantly reduce the likelihood of any particulates or debris being discharged off-site (Refer to Section 4.2.2).</p>		
W-4.50	<p>Drains, gutters, access ways and roadways must be maintained free of sediment and any other material. Gutters and roadways must be swept/scraped regularly to maintain them in a clean state.</p>	<p>During the site inspection on 1 March 2019, the majority of the drains, gutters, access ways and roadways at the WGCP were observed to be mostly free of sediment and any other material.</p> <p>Some damaged sand bags were observed near a drain during the previous IEA in 2016; however, no damaged sand bags were observed during the site inspection on 1 March 2019. Site personnel advised that sand bags are now only used when needed for a specific activity and are then removed.</p> <p>Some debris was observed near a drain at the Gypsum storage area during the previous IEA in 2016. This area was observed to be significantly cleaner during the site inspection on 1 March 2019.</p> <p>Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED diversion project should significantly reduce the likelihood of any particulates or debris being discharged off-site (Refer to Section 4.2.2).</p>	Compliant	
W-4.51	<p>Building operations such as brick cutting, the washing of tools or paint brushes, or other equipment and the mixing of mortar must not be carried out on the roadway or public footpath or any other locations which could lead to the discharge of materials into the stormwater drainage system or natural watercourse.</p>	<p>The scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases (Refer to Section 1.4). This CC has been assessed as 'Compliant' since it is marked as complete in the 2013 IEA.</p> <p>Note: No activities of this type were observed during the site inspections on 1 March 2019.</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
E.18 Design and Lighting				
W-4.52	The colours and materials used in the proposed Sinter Plant Waste Gas Cleaning Plant must be in accordance with the BHP Environmental Improvement Program – Masterplan for the Steelworks Site.	The scope of the 2019 IEA did not include a detailed assessment of compliance with the CCs for the construction, commissioning and initial operations phases (Refer to Section 1.4). This CC has been assessed as ‘Compliant’ since it is marked as complete in the 2013 IEA.	Compliant	
W-4.53	The Applicant must ensure that any external lighting associated with the development is mounted, screened, and directed in such a manner so as not to create a nuisance to surrounding land uses. The lighting must be the minimum level of illumination necessary.	BSL has not recorded any complaints from the local community or neighbouring port users regarding lighting at the WGCP since the previous IEA in 2016 (Refer to Section 4.2.1) and this was not identified as a concern during consultation prior to the audit (Refer to Section 2.3.1).	Compliant	
E.19 Environmental Awareness Training				
W-4.54	All staff including contractors and subcontractors must be trained in environmental awareness and responsibility required under the POEO Licence both generally and specific to the Applicant’s activities. The training program must be developed and implemented prior to any works at the site.	<p>BSL advised that the hierarchy of environmental related training is as follows:</p> <p>Illawarra Site</p> <ol style="list-style-type: none"> 1. ‘Illawarra Site Induction’ – This is a high-level induction and refers to BSL’s HSEC policy (not verified). 2. ‘Illawarra Site Environment Awareness Refresher Training’ (Qualification No. 52002852, copy provided) - This is the main environmental awareness training module at an Illawarra site level (Note: This has superseded the 6-module training course observed during the previous IEA). It is a training presentation (19 slides) rather than an eLearning module and identifies that BSL has legal obligations under (POEO Act 1927 and EPA licence 6092) to protect and improve the environment. 3. ‘Illawarra Waste Management Awareness’. 4. ‘Fugitive Dust Management Awareness’. 	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<p>Ore Preparation</p> <p>5. 'Ore Preparation Departmental Induction and Conveyor Safety' (Note: Qualification No. 52002065, also referred to as the 'Ore Preparation Safety Induction') – This includes an outline of basic environmental responsibilities (copy provided), such as reporting environmental incidents and near misses, dust emissions and 'drag out' on roads. This is an eLearning module with an eLearning assessment.</p> <p>6. 'Ore Prep Environment Awareness' – This is the same as the 'Illawarra Site Environment Awareness Refresher Training' (copy provided) but with two additional site-specific slides (i.e. completion of this training also completes the Illawarra level training).</p> <p>An example 'Ore Preparation Training Matrix' (Excel spreadsheet, dated 12-Feb-19) was provided for Crew D. The following environmental training is listed in this training matrix:</p> <ul style="list-style-type: none"> • 'Illawarra Site Induction' (All up-to-date). • 'Illawarra Waste Management Awareness' (All complete). • 'Fugitive Dust Management Awareness' (All complete). • 'Ore Preparation Safety Induction' (All complete). • 'Ore Prep Environment Awareness' (All complete). <p>BlueScope personnel are required to complete all of the training listed above. Contractors are required to complete the 'Illawarra Site Induction' and the 'Ore Preparation Departmental Induction and Conveyor Safety' training. SCE Industrial Services (Nov-18), which lists examples of the actions / evidence required to demonstrate compliance with</p>		

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		EPL licence requirements and lists examples of the actions / evidence required to demonstrate compliance (e.g. training in place).		
F. ENVIRONMENTAL MONITORING / AUDITING AND RECORDING CONDITIONS				
F.1 Monitoring Records				
W-6.1	DELETED.	Refer to EPL # M1.1.		
W-6.2	DELETED.	Refer to EPL # M1.2.		
W-6.3	DELETED.	Refer to EPL # M1.3.		
F.2 Testing Methods – Concentration Limits				
W-6.4	DELETED.	Refer to EPL # M3.1.		
F.3 Load Based Licensing Scheme				
W-6.5	DELETED.	Refer to EPL # M8.2.		
W-6.6	DELETED.			
W-6.7	DELETED.			
F.4 Monitoring of Concentration of Pollutants Discharged				
W-6.8	DELETED.	Refer to EPL # M2.1 and EPL # M2.2.		
W-6.9	DELETED.	Refer to EPL # M2.1 and EPL # M2.2.		
O-3.1	DELETED.			
O-3.2	DELETED.			
W-6.10	DELETED.	Refer to EPL # M2.5 and EPL # M8.1.		
F.5 Monitoring Program – PRP 53 (Sinter Plant) Compliance Monitoring Program				
W-6.11	DELETED.			

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
F.6 Monitoring Program – Effluent Characterisation Program				
W-6.13	DELETED.			
W-6.14	DELETED.			
F.7 Monitoring Program – Investigations for the Provision of Instantaneous Monitoring of Dioxin and Solid Particulates				
W-6.15	DELETED.	Refer to EPL # L3.1 to L3.4.		
W-6.16	DELETED.			
W-6.17	DELETED.			
F.8 Monitoring Program – Visibility Monitoring				
W-6.18	DELETED.	Refer to EPL # M9.2.		
F.9 Monitoring Program – Mass Emission Monitoring Program				
W-6.19	DELETED.			
W-6.20	DELETED.			
W-6.21	DELETED.			
W-6.22	DELETED.			
F.10 Monitoring Program – Dioxin Pathway Monitoring Program				
W-6.23	DELETED.			
W-6.24	DELETED.			
W-6.25	DELETED.			
W-6.26	DELETED.			

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
F.11 Monitoring Program – Sinter Plant Electrostatic Precipitator (ESP) Outlet Dust Load Monitoring Program				
W-6.27	DELETED.			
W-6.28	DELETED.			
F.12 Monitoring Program – Radionuclide Monitoring Program				
W-6.29	DELETED.			
W-6.30	DELETED.			
F.13 Monitoring Program – Noise Monitoring				
W-6.31	DELETED.			
O-3.3	DELETED.			
O-3.4	DELETED.			
G. ENVIRONMENTAL REPORTING				
G.1 Annual Return				
W-7.1	DELETED.			
W-A3.1 [Also EPL # R1.1]	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ul style="list-style-type: none"> a Statement of Compliance; and a Monitoring and Complaints Summary. <p>A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	<p>The Annual Returns for 2016–2017 and 2017-2018 were sighted (Copies provided) and include a Statement of Compliance and Monitoring and Complaints Summary.</p> <p>Note: Annual Returns are now submitted using an on-line system (i.e. there is no ‘approved form’); therefore, it is not possible to sight a copy with electronic signatures. An example receipt from eConnect confirming submission was sighted (copy not provided) and the date of receipt of the Annual Returns for EPL No. 6092 is provided on the EPA website (https://apps.epa.nsw.gov.au/prpoeoapp/).</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>Note: EPL # R1.1 is as follows: <i>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</i></p> <ol style="list-style-type: none"> 1. <i>a Statement of Compliance,</i> 2. <i>a Monitoring and Complaints Summary,</i> 3. <i>a Statement of Compliance - Licence Conditions,</i> 4. <i>a Statement of Compliance - Load based Fee,</i> 5. <i>a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,</i> 6. <i>a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and</i> 7. <i>a Statement of Compliance - Environmental Management Systems and Practices.</i> <p><i>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</i></p>			
<p>W-A3.2 [Also EPL # R1.2 to R1.4]</p>	<p>An Annual Return must be prepared in respect of each reporting, except as provided below</p> <p>Note: The term “reporting period” is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p> <p>Where this licence is transferred from the licensee to a new licensee:</p> <ul style="list-style-type: none"> • the transferring licensee must prepare an annual return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and 	<p>The Annual Returns for 2016–2017 and 2017-2018 were sighted (Copies provided) – Refer to CC # W-A3.1.</p> <p>The EPL has never been transferred to another licensee, surrendered or revoked. This appears to be consistent with the information for EPL 6092 on the EPA website.</p>	<p>Compliant</p>	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<ul style="list-style-type: none"> the new licensee must prepare an annual return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. <p>Note: An application to transfer a licence must be made in the approved form for this purpose.</p> <p>Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an annual return in respect of the period commencing on the first day of the reporting period and ending on:</p> <ul style="list-style-type: none"> in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or in relation to the revocation of the licence – the date from which notice revoking the licence operates. 			
W-A3.3 [Also EPL # R1.5]	<p>The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').</p> <p>Note: EPL # R1.1 is as follows: <i>The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence</i></p>	<p>The Annual Returns for 2016–2017 and 2017-2018 were sighted (Copies provided) and include a Statement of Compliance and Monitoring and Complaints Summary.</p> <p>Note: Annual Returns are now submitted using an on-line system (i.e. not by 'registered post'). An example receipt from eConnect confirming submission was sighted (copy not provided) and the date of receipt of the Annual Returns for EPL No. 6092 is provided on the EPA website (https://apps.epa.nsw.gov.au/prpoeoapp/).</p>	<p>Compliant</p>	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<i>not later than 60 days after the date the transfer was granted (the 'due date').</i>			
W-A3.4 [Also EPL # R1.6]	Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date. The notification must specify: <ul style="list-style-type: none"> the assessable pollutants for which the actual load could not be calculated; and the relevant circumstances that were beyond the control of the licensee. 	BSL advised that the Annual Return is issued by the due date and this would appear to be confirmed by the submission dates listed on the EPA website for EPL 6092 since the previous IEA in 2016 (viz. 26-Aug-16, 29-Aug-17 and 29-Aug-18).	Compliant	
W-A3.5 [Also EPL # R1.7]	The licensee must retain a copy of the annual return supplied to the EPA for a period of at least 4 years after the annual return was due to be supplied to the EPA.	Annual returns were sighted for the previous four years (Copies provided for 2016-2017 and 2017-2018). These are stored in Documentum (sighted) and it was observed that electronic copies are held dating back to 2007.	Compliant	
W-A3.6 [Also EPL # R1.8]	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: <ul style="list-style-type: none"> the licence holder; or by a person approved in writing by the EPA to sign on behalf of the licence holder. <p>A person who has been given written approval to certify a Statement of Compliance under a licence issued under the Pollution Control Act 1970 is taken to be approved for the purpose of this condition until the date of first review this licence.</p>	The Annual Returns for 2016–2017 and 2017-2018 were sighted (Copies provided) and include a Statement of Compliance and Monitoring and Complaints Summary. Note: Annual Returns are now submitted using an on-line system; therefore, it is not possible to sight a copy with electronic signatures. An example receipt from eConnect confirming submission was sighted (copy not provided) and the date of receipt of the Annual Returns for EPL No. 6092 is provided on the EPA website (https://apps.epa.nsw.gov.au/prpoeoapp/).	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
G.2 PRP Progress Reports / Notification of Hot Commissioning				
W-7.2	DELETED.			
W-7.3	DELETED.			
G.3 Environmental Management Report				
W-7.4	<p>By 31 October 2017 and every three years thereafter, unless agreed by the Secretary, the Applicant shall review and report on the environmental performance of the development to the satisfaction of the Secretary. This review must:</p> <ul style="list-style-type: none"> (a) describe the development that was carried out during the reporting period and the development that is proposed to be carried out over the next three years; (b) include a comprehensive review of the monitoring results and complaints records of the development during reporting period, which includes a comparison of these results against the: <ul style="list-style-type: none"> (i) the relevant statutory requirements, limits or performance measures/criteria; (ii) requirements of any plan or program required under this consent; (iii) the monitoring results of previous years; and (iv) the relevant predictions in the SEE; (c) identify any non-compliance during the reporting period, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the development; 	<p>The most recent 'Triennial Environmental Management Report' (EMR) for 1-Jul-14 to 30-Jun-17 was submitted to the DP&E on 26-Oct-17. This covered the Sinter Plant Waste Gas Cleaning Plant (DA-26-02-01, MOD2), Gypsum Plant (DA-26-02-01 MOD 50-4-2005-i) and the Ore Preparation Upgrade Project (MP 06-0229 Mod 1).</p> <p>The Department advised that additional information was required and that it did not comply with Departmental guidelines. Therefore, the EMR was revised and resubmitted. The letter requesting resubmission of the report, and the revised EMR, are available on the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/).</p> <p>The re-submitted EMR appears to have addressed items (a) to (f) and was approved by the DP&E (Letter dated 9-Jan-18, copy provided).</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>(e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and</p> <p>(f) describe what measures will be implemented over the next three years to improve the environmental performance of the development.</p>			
W-7.5	<p>After reviewing the report submitted under condition 7.4, the Secretary may require the Proponent to address certain matters identified in the report. The Proponent must comply with any reasonable requirements of the Secretary.</p>	<p>Refer to CC # W-7.5.</p> <p>The approval letter from the DP&E for the revised EMR (Letter dated 9-Jan-18, copy provided) included a request to post the EMR on the website within one month of the letter date. It was not possible to verify that the EMR was uploaded within one month; however, the revised EMR is available on the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/).</p>	Compliant	
O-7.2	<p>By 31 October 2017 and every three years thereafter, unless otherwise agreed by the Secretary, the Proponent shall review and report on the environmental performance of the project to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the project that was carried out during the reporting period and the project that is proposed to be carried out over the next three years;</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the project during the reporting period, which includes a comparison of these results against the:</p>	<p>Refer to CC # W-7.5.</p> <p>Note: The most recent 'Triennial Environmental Management Report' (EMR) covered the Sinter Plant Waste Gas Cleaning Plant (DA-26-02-01, MOD2), Gypsum Plant (DA-26-02-01 MOD 50-4-2005-i) and the Ore Preparation Upgrade Project (MP 06-0229 Mod 1).</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<ul style="list-style-type: none"> (i) the relevant statutory requirements, limits or performance measures/criteria; (ii) requirements of any plan or program required under this approval; (iii) the monitoring results of previous years; and (iv) the relevant predictions in the EA and any modification request documentation; (c) identify any non-compliance during the reporting period and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the project; (e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause; and (f) describe what measures will be implemented during the reporting period to improve the environmental performance of the development. 			
O-7.3	<p>After reviewing the report submitted under condition 7.2, the Secretary may require the Proponent to address certain matters identified in the report. The Proponent must comply with any reasonable requirements of the Secretary.</p>	<p>Refer to CC # W-7.5.</p> <p>The approval letter from the DP&E for the revised EMR (Letter dated 9-Jan-18, copy provided) included a request to post the EMR on the website within one month of the letter date. It was not possible to verify that the EMR was uploaded within one month; however, the revised EMR is available on the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/).</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
G.4 Independent Environmental Audit				
W-7.6	<p>Within 12 months of commissioning the Waste Gas Cleaning Plant, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit. The Independent Environmental Audit must:</p> <ul style="list-style-type: none"> (a) be conducted by a suitably qualified, experienced, and independent person whose appointment has been endorsed by the Secretary; (b) be consistent with ISO 14010 – Guidelines and General Principles for Environmental Auditing, and ISO 14011 – 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) recommend measures or actions to improve the environmental performance of the plant, and/or the environmental management and monitoring systems. 	<p>The previous IEA was undertaken in 2016.</p> <p>It is noted in the acceptance letter from the DP&E for previous IEA (letter dated 5-Aug-16, copy provided) that “The Secretary considers that the IEA generally satisfies the requirements of the relevant conditions of the approvals”.</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
W-7.7	<p>Within 2 months of commissioning the audit, the Applicant must submit a copy of the audit report to the Secretary. After reviewing the report, the Secretary may require the Applicant to address certain matters identified in the report. The Applicant must comply with any reasonable requirements of the Secretary.</p>	<p>The previous IEA was undertaken in 2016.</p> <p>It is noted in the acceptance letter from the DP&E for previous IEA (letter dated 5-Aug-16, copy provided) that the report was submitted to the Department on 16 June 2016, which was not within 2 months of the first day of the site visit (8-10 and 24 March 2016). This was noted as being non-compliant with this CC. No action was proposed by the DP&E.</p> <p>It is also reported in the letter from the DP&E that: “A review of the BlueScope Steel website could not locate the documents as required by Condition 5.4 of PA 06_0229 MOD1. It is requested that the documents as required by this condition are uploaded to the website by 30 August 2016, with a link being provided by email to the Department confirming that this has been completed”. The letter from BSL to DP&E (dated 24-Aug-18) was provided to confirm that this information was uploaded to the website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/) by the due date (Note: CC # 5.4 refers to the OPUP project).</p> <p>The status of the corrective actions identified in the 2016 IEA is reported in Section 4.3.5.</p>	Non-Compliant	
O-4.1	<p>Within three years of the last Independent Environmental Audit in June 2013, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:</p>	<p>The previous IEA was undertaken in 2016.</p> <p>It is noted in the acceptance letter from the DP&E for previous IEA (letter dated 5-Aug-16, copy provided) that “The Secretary considers that the IEA generally satisfies the requirements of the relevant conditions of the approvals”.</p>	Compliant	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any other licences or approvals;</p> <p>(d) review the adequacy of any approved strategy, plan or program required under the approvals identified in part c); and, if appropriate</p> <p>(e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under this approval.</p>			
O-4.2	<p>Within three months of commissioning this audit or as otherwise agreed by the Secretary, the Proponent shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.</p>	<p>The previous IEA was undertaken in 2016 and included BSL's initial response to the recommendations.</p> <p>It is noted in the acceptance letter from the DP&E for previous IEA (letter dated 5-Aug-16, copy provided) that the report was submitted to the Department on 16 June 2016. This was not within 3 months of the first day of the site visit (8-10 and 24 March 2016).</p> <p>The status of the corrective actions identified in the 2016 IEA is reported in Section 4.3.5.</p>	Non-Compliant	
G.5 Incident Reporting				
O-7.1	<p>Within 24 hours of the occurrence of an incident that causes (or may cause) harm to the environment, the Proponent shall notify the Secretary and any other relevant agencies of the incident.</p>	<p>Reporting requirements are included in the <i>Significant Environmental Incident Investigation and Reporting Process</i> (MA-ENV-11-01, dated May 2016, copy provided). It is reported in Section 5.2 of this procedure that: <i>In accordance with EPL 6092, reporting requirements exist for licence non-</i></p>	Not Triggered	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>Within seven (7) days of the detection of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident.</p>	<p>compliances and significant environmental incidents causing or threatening material harm. The Development Consents for some areas also require the Department of Planning to be notified of the significant incident and a report to be submitted in accordance with the Development Consent conditions. Contact the Environment Department for details.</p> <p>This has not been triggered since the previous IEA in 2016.</p> <p>Note: The two non-compliances recorded since the previous IEA in 2016 (Refer to Section 4.2.1) were due to minor exceedances of EPL limits and neither was considered to be an “incident that causes (or may cause) harm to the environment”. The records in MARs for these non-compliances (i1017747 and i1341316, copies provided) are both flagged as being “Environment Authority notifiable” and indicate the name of the EPA officer contacted.</p>		
<p>W-A3.7 [Also EPL # R2.1 to R2.2]</p>	<p>Note: The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p> <p>Notifications must be made by telephoning the EPA’s Pollution Line service on 131 555.</p> <p>The licensee must provide written details of the notification to the EPA within seven days of the date on which the incident occurred.</p>	<p>Also refer to CC # O-7.1 above.</p> <p>Note: BSL advised that the EPA did not request additional written details for any of the self-reports or the two non-compliances recorded since the previous IEA in 2016 (Refer to Section 4.2.1). This appears to be consistent with the consultation with the EPA prior to the IEA (Refer to Section 2.3.1).</p>	<p>Not Triggered</p>	
<p>W-A3.8 [Also EPL # R3.1 to R3.4]</p>	<p>Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <ul style="list-style-type: none"> where this licence applies to premises, an event has occurred at the premises; or 	<p>Also refer to CC # O-7.1 above.</p> <p>Note: BSL advised that the EPA did not request additional written details for any of the self-reports or the two non-compliances recorded since the previous IEA in 2016 (Refer to Section 4.2.1). This appears to be consistent with the</p>	<p>Not Triggered</p>	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<ul style="list-style-type: none"> • where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, • and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event. <p>The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.</p> <p>The request may require a report which includes any or all of the following information:</p> <ul style="list-style-type: none"> • the cause, time and duration of the event; • the type, volume and concentration of every pollutant discharged as a result of the event; • the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; • the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; • action taken by the licensee in relation to the event, including any follow-up contact with any complainants; 	<p>consultation with the EPA prior to the IEA (Refer to Section 2.3.1).</p>		

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<ul style="list-style-type: none"> • details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and • any other relevant matters. <p>The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.</p>			

B.2 Additional Conditions from Environment Protection Licence

Additional conditions from the EPL that are not covered by an equivalent Consent Condition are included in this Section (e.g. Additional EPL conditions relating to diversion of the WGCP stack, which were introduced following the WGCP fire in 2014).

Table 12 Audit Findings (Additional Conditions from EPL)

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s																						
LIMIT CONDITIONS																										
L2 Load Limits																										
L2.4	<p>For the discharge point specified in the heading of the table below, the annual mass load of pollutant discharged at that point must not exceed the total mass limits specified for that pollutant in the following table.</p> <table border="1" data-bbox="241 813 846 1085"> <thead> <tr> <th>Discharge Point</th> <th>Pollutant</th> <th>Units of Measure</th> <th>Total Mass Limit</th> <th>Method</th> </tr> </thead> <tbody> <tr> <td>107</td> <td>Solid Particles</td> <td>Tonnes per annum</td> <td>240</td> <td>Load Calculation Protocol for use by holders of NSW EPL</td> </tr> </tbody> </table>	Discharge Point	Pollutant	Units of Measure	Total Mass Limit	Method	107	Solid Particles	Tonnes per annum	240	Load Calculation Protocol for use by holders of NSW EPL	<p>It is reported in the previous IEA report that the annual mass load of solid particles discharged at Pt 107 (WGCP stack) for 2013 to 2015 was reported to range from 31.4 to 66.3 tonnes.</p> <p>The results reported for 2016 to 2018 are comparable:</p> <table border="1" data-bbox="891 853 1541 1189"> <thead> <tr> <th>Year</th> <th>Total Mass Discharged (tonnes per annum)</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>57.2</td> <td>Air Pollutant Emissions Report 1 July 2015 to 30 June 2016</td> </tr> <tr> <td>2017</td> <td>84.9</td> <td>Air Pollutant Emissions Report 1 July 2015 to 30 June 2016</td> </tr> <tr> <td>2018</td> <td>56</td> <td>'FY 2018 Annual Report' on the 'Monitoring Data' page of the BSL website</td> </tr> </tbody> </table> <p>BSL's estimate for 2019 is 55 tonnes based on the data available to date (copy not provided).</p>	Year	Total Mass Discharged (tonnes per annum)	Source	2016	57.2	Air Pollutant Emissions Report 1 July 2015 to 30 June 2016	2017	84.9	Air Pollutant Emissions Report 1 July 2015 to 30 June 2016	2018	56	'FY 2018 Annual Report' on the 'Monitoring Data' page of the BSL website	Compliant	
Discharge Point	Pollutant	Units of Measure	Total Mass Limit	Method																						
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EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
L3 Concentration Limits				
L3.1 to L3.3	<p>For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.</p> <p>Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.</p> <p>To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\.</p>	EPL # L3.1 to L3.3 are explanatory notes for EPL # L3.4 and L3.5 (See below for findings and compliance assessment).	Refer to EPL # L3.4 and L3.5	
L3.4	<p>Air Concentration Limits</p> <p><i>NOTE: TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.</i></p> <p>Note: 2. Notes relating to Discharge Point 107 – Sinter Plant Waste Gas Cleaning Plant Stack</p> <p>a) In relation to particulate emissions at Point 107, the evolution of fine particulate standards may require a better characterisation and health risk assessment of the significance of its fine particulate component.</p> <p>A program may be developed through the licensing process to address this issue.</p> <p>b) The Sinter Plant Waste Gas Cleaning Plant (WGCP) should be designed to meet a concentration of 0.1 ng/m³ of gaseous and particulate phase polychlorinated dibenzo-p-dioxins (PCDD) and polychlorinated dibenzofurans (PCDF) as tetrachloro-dibenzo-dioxin</p>	<p>Point 2 (Sinter Machine Room Dedusting Stack) and Point 107 (Sinter Plant WGCP Exhaust Stack)</p> <p>Current discharge limits are specified in EPL # L3.4 for Point 2 (Sinter Machine Room Dedusting Stack) and Point 107 (Sinter Plant WGCP Exhaust Stack). Note: discharge limits for Point 151 are included in EPL # E5.5.</p> <p>Monitoring results for Point 2 and Point 107 are reported monthly on the ‘Monitoring Data’ page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2019-nsw-monitoring-data/). As at 17 April 2019, this website was observed to include monthly reports for April 2012 to February 2019. The reported data indicates compliance with the EPL limits for Point 2 and Point 107 since the previous IEA in 2016 and this is consistent with the corresponding Annual Returns and data recorded in ‘EHS Monitor Pro’.</p> <p>Monitoring results from ‘EHS Monitor Pro’ for dioxins at the WGCP stack (Data provided for March 2016 to December</p>	Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>(TCDD) equivalent, WHO 2005 TEF, dry 101.3 kPa, 273 K, 15.7% O₂ in waste gases at Point 107.</p> <p>c) In relation to the dioxin limit at Point 107, testing conducted for PRPs 108 and 111 showed an average reduction in dioxins emitted to the atmosphere of 96 percent as a result of the Sinter Plant WGCP. The EPA in a letter dated 9 June 2005 (Ref: WOF 12470, WOF12466) has proposed to the licensee that upon completion of investigations aimed at reducing levels of dioxins in Sinter Plant WGCP dust that negotiations will commence with a view to reducing the dioxin limit for Point 107.</p>	<p>2018) indicate that dioxins are well below the EPL limit of 0.3 ng/m³.</p>		
L3.5	<p>Water and/or Land Concentration Limits</p> <p><i>NOTE: TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.</i></p> <p>Note: 1. The discharge limits for Point 89 (Iron Making East Drain) are based on monitoring data available in 2001 for this Point and the estimated contribution of pollutants from the Sinter Plant Waste Gas Cleaning Plant. It is proposed that these limits will be reviewed by the EPA taking into account monitoring undertaken as part of the effluent characterisation program required by PRP 112 - SPWGCP Effluent Characterisation Program.</p>	<p>Point 89 (Iron Making East Drain)</p> <p>Monitoring results for Point 89 are reported on the ‘Monitoring Data’ page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2019-nsw-monitoring-data/). As at 17 April 2019, this website was observed to include monthly reports for April 2012 to February 2019. These reports indicate compliance with the EPL discharge limits except for one exceedance of the wet weather iron limit at the IMED on 7-Jul-16 (Refer to Section 4.2.1).</p> <p>Monitoring results for Point 89 are also recorded in the ‘EHS Data Monitor Pro’ web-based application. Data recorded for March 2016 to December 2018 was sighted for EPL Pt 89 (Copies provided of graphical data).</p> <p>This CC has been assessed as ‘Non-Compliant’ due to the exceedance of the wet weather iron limit at Point 89 (IMED). A recommendation has not been included as no further exceedances have been recorded since the IMED Drainage Diversion Project (PRP 176) was completed and there has</p>	Non-Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		been no reported discharge from Pt 89 since May 2017 (Refer to Section 4.2.2).		
L6 Noise Limits				
L6.2	<p>All construction activities for new works (i.e. excluding routine maintenance works), including pile driving, jack hammering, warning sirens and similar high intensity noise sources, undertaken at the premises, and which are audible at residential premises, must be restricted to the following times:</p> <p>a) 7:00 am to 6:00 pm Mondays to Fridays; b) 8:00 am to 1:00 pm on Saturdays; and c) At no time on Sundays and Public Holidays.</p>	<p>BSL advised that this condition has not been triggered for the facilities associated with the OPUP or WGCP (including Gypsum Plant) since the previous IEA in 2016.</p> <p>No evidence of new works (i.e. excluding routine maintenance works) of a type listed in EPL # L6.2 was sighted during the site inspection on 1 March 2019.</p> <p>No noise complaints have been recorded since the previous IEA in 2016 (Refer to Section 4.2.1).</p>	Not Triggered	
L6.3	The hours of construction specified above may be varied by written consent of the EPA.	Not triggered since the previous IEA in 2016 (Refer to EPL # L6.2).	Not Triggered	
OPERATING CONDITIONS				
O3 Dust				
O3.2	<p>a) The licensee must develop and comply with the licensee’s Environmental Management Manual “Fugitive Dust Management System” (FDMS) (dated 7 March 2018 or as varied with the prior written approval of the EPA). (EPA file EF13/2639). The specifics within the FDMS are to be applied in accordance with this condition.</p> <p>b) For the purpose of this condition, "fugitive dust emissions" means dust emissions from a non-point source from or within any of the numbered areas detailed in the Bluescope Steel Port Kembla drawing</p>	<p>Dust emissions are required to be managed in accordance with the Fugitive Dust Management System (FDMS) (Divisional procedure MA-ENV-02-02, dated February 2018, copy provided), which requires additional controls on a case-by-case basis.</p> <p>Designated stockpile areas are nominated in the FDMS (copy provided) and a risk assessment is undertaken if a stockpile is required in outside one of the nominated areas (Refer to EPL # O3.5).</p> <p>Video surveillance is provided at the control room, water carts were observed to wet down roads, and roadways</p>	Non-Compliant	Refer to 2019/3.

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>443942, provided by the licensee to the EPA on 7 March 2018 and filed on EPA file DOC18/144556.</p> <p>c) The licensee must conduct monitoring at all sites and complete a regular survey of the nominated sites in accordance with the FDMS.</p> <p>d) For the purposes of the FDMS:</p> <p>i) Dust Emission Ranking (DER) is obtained by using the descriptions shown at table 7.2 and numbered photograph plates detailed in the FDMS.</p> <p>ii) No DER rating and reporting requirements apply when wind speeds exceed 25 knots (12.9 m/sec) measured on the licensed premises.</p> <p>Follow-up Actions</p> <p>e) In the event that a DER 3 or greater, as set out in the FDMS, is observed then:</p> <p>i) Each such event must be reported in the licensee's incident reporting system, and</p> <p>ii) If the EPA requests, the licensee must demonstrate that measures were taken which complied with the FDMS to minimise those emissions.</p> <p>f) Nothing in this condition affects the responsibility of the licensee to comply with condition O1.1 and condition O2.1.</p>	<p>appeared to have been swept by the mobile sweepers (As sighted during site inspection on 1 March 2019).</p> <p>An example weather alert was sighted (dated 23-Feb-19, copy provided).</p> <p>There were no Sinter Plant related self-reports with a DER of 3 or greater since the previous IEA in 2016 (Refer to Section 4.2.1).</p> <p>Overall, the level of compliance with this condition appears to be good for most of the Sinter Plant (Including WGCP and Gypsum Plant); however, it has been categorised as non-compliant due to the observations listed in CC # O-2.2.</p>		
O3.5	<p>MATERIAL STOCKPILES – DUST AND STORMWATER CONTROLS</p> <p>1. Development of any new stockpiles (permanent, temporary or emergency) must be in accordance with</p>	<p>Designated stockpile areas are nominated in the FDMS (copy provided) and a risk assessment is undertaken if a stockpile is required in outside one of the nominated areas (Refer to EPL # O3.5). The three categories (temporary, emergency and permanent) are included in the FDMS.</p>	Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>the BSL Risk Assessment Process (MA-ENV-03-08). Note i. and ii.</p> <p>Note:</p> <ul style="list-style-type: none"> i. All materials stockpiles must have appropriate stormwater and dust controls in place and this condition does not negate the requirements of condition O3.1. ii. Permanent material stockpiles approved for use by the EPA are identified on the map titled BlueScope Steel Titled Number 2 Works Permanent Stockpiles Drawing Number 398702 ("the Map"). <p>2. The EPA must be consulted prior to the establishment of any new permanent or temporary stockpiles:</p> <ul style="list-style-type: none"> a) to be located outside of the No 2 Works Permanent Stockpile Areas designated on the Map b) if materials other than those specified on the Map are to be stored in that area <p>Definitions – Stockpiles</p> <ul style="list-style-type: none"> i. Permanent – areas dedicated to the ongoing storage of materials ii. Temporary – areas dedicated to the storage of materials when permanent stockpile areas reach capacity or materials require temporary storage due to delivery / shipment requirements and/or unforeseen circumstances. iii. Emergency – areas used to stockpile materials during plant breakdown or maintenance to ensure the continuation of supply for plant processes (e.g. conveyor outages) these stockpiles only remain until normal operations resume. 	<p>An example Stock pile risk assessment was sighted for a permanent dolomite stockpile (copy provided).</p>		

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
O4 Processes and management				
O4.17	The WGCP must be operated with the objective of ensuring the maximum practicable recovery of sulphur rich gas (SRG) for treatment and reuse.	<p>BSL has made self-reports to EPA when SRG recovery is not available (Refer to Section 4.2.1).</p> <p>BSL track 'SRG availability' (i.e. availability of Gypsum Plant) and a monthly summary report (Excel spreadsheet) is submitted to the EPA, which includes the status of the regenerator, SRG plant, Ammonia storage and CEM. An example report was sighted for January 2019 (copy provided). This includes the % availability of the SRG plant for month to date (Reported to be 92.2% for January 2019).</p> <p>This has been assessed as an 'Compliant' since BSL appear to be attempting to operate the plant to ensure maximum <i>practicable</i> recovery and are self-reporting to the EPA when SRG recovery is not available.</p>	Compliant	
O4.18	The Licensee must notify the EPA of any venting of sulfur rich gas (SRG) to atmosphere that exceeds 24 continuous hours.	<p>BSL advised that the 24-hour period was added to the EPL after the EPA had reviewed the historical SRG outage data (Not verified).</p> <p>BSL has made self-reports to EPA when SRG recovery is not available (Refer to Section 4.2.1).</p> <p>A monthly summary report (Excel spreadsheet) is submitted to the EPA, which includes the status of the regenerator, SRG plant, Ammonia storage and CEM. An example report was sighted for January 2019 (copy provided). This includes the % availability of the SRG plant for month to date (Reported to be 92.2% for January 2019).</p>	Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
MONITORING AND RECORDING CONDITIONS				
M1 Monitoring records				
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	EPL # M1.1 is an explanatory note for EPL # M1.2 and M1.3 (See below for findings and compliance assessment).	Refer to EPL # M1.2 and M1.3	
M1.2	<p>All records required to be kept by the licence must be:</p> <ul style="list-style-type: none"> a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them. 	<p>Monitoring data is reported monthly on the 'Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2019-nsw-monitoring-data/). As at 17 April 2019, this website was observed to include monthly reports for April 2012 to February 2019.</p> <p>The 'EHS Data Monitor Pro' web-based application (Sighted) can present the data graphically. Graphical data from 'EHS Data Monitor Pro' was provided for March 2016 to December 2018 for all monitoring undertaken for EPL Pts 2, 89, 107 and 151. Records dating back to 1 Jan 2006 were sighted in 'EHS Data Monitor Pro' for EPL Pt 107 and BSL advised that older records may be held in Documentum (Not verified).</p>	Compliant	
M1.3	<p>The following records must be kept in respect of any samples required to be collected for the purposes of this licence:</p> <ul style="list-style-type: none"> a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample. 	Sampling data is entered directly into the 'LIMS Solutions' database (Sighted, copy not provided), which is then imported into the 'EHS Data Monitor Pro' web-based application (Sighted). All of the information required to comply with EPL # M1.3 was sighted to be recorded.	Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
M2 Requirement to monitor concentration of pollutants discharged				
M2.1 & M2.2	<p>For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:</p> <p>Air Monitoring Requirements</p> <p><i>NOTE: TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.</i></p> <p>Note: All methods are as specified in the "Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales" and all monitoring must be conducted strictly in accordance with the requirements outlined in this document.</p>	<p>Point 2 (Sinter Machine Room Dedusting Stack) and Point 107 (Sinter Plant WGCP Exhaust Stack)</p> <p>Monitoring requirements (sampling method, units of measure and sample frequency) are specified in EPL # M2.2 for Point 2 (Sinter Machine Room Dedusting Stack) and Point 107 (Sinter Plant WGCP Exhaust Stack). Note: Monitoring requirements for Point 151 are included in EPL # E5.6.</p> <p>Monitoring data is reported monthly on the ‘Monitoring Data’ page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2019-nsw-monitoring-data/). As at 17 April 2019, this website was observed to include monthly reports for April 2012 to February 2019 and the data recorded appears to comply with the requirements of this condition (Note: In some cases, the sample frequency is significantly higher than that required by this condition).</p> <p>The ‘EHS Data Monitor Pro’ web-based application (Sighted) can present the data graphically. Graphical data from ‘EHS Data Monitor Pro’ was provided for March 2016 to December 2018 for all monitoring undertaken for EPL Pts 2 and 107.</p> <p>Note: Continuous monitoring of opacity is required for Pt 2 and of total solid particles for Pt 151. Continuous monitoring data is stored in CITEC rather than being reported via ‘EHS Data Monitor Pro’. Data for Pt 2 for 2015 to 2019 was sighted (Copy provided).</p> <p>BSL has self-reported (as a non-compliance in the Annual Returns) that some air monitoring analysis is not fully compliant with EPA approved methods. This is understood to relate to the existing platform at the Sinter Plant Room</p>	Non-Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<p>Dedusting Stack (EPL Pt 2). This platform only allows access to 2 out of 4 sampling ports as it does not go around the whole stack. Therefore, this condition has been categorised as 'Non-Compliant' (Also refer to EPL # M3.1). A recommended action has not been included since it is reported on the EPA website for EPL No. 6092 that the EPA has already "requested additional information to progress BSL application to modify sampling methods".</p>		
M2.5 & M2.6	<p>Water and/or Land Monitoring Requirements</p> <p><i>NOTE: TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.</i></p> <p>Note: Special Frequency 11 means daily during a dry weather discharge. In the event monitoring does not occur, the licensee must advise the EPA and provide justification of why monitoring was not undertaken.</p>	<p>Point 89 (Iron Making East Drain)</p> <p>Monitoring results for Point 89 are reported on the 'Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2019-nsw-monitoring-data/). As at 17 April 2019, this website was observed to include monthly reports for April 2012 to February 2019. These reports appear to indicate that monitoring has occurred in accordance with Special Frequency 11, which applies for all pollutants at Pt 89.</p> <p>Note: There has been no reported discharge from Pt 89 since May 2017 due to completion of the IMED Drainage Diversion Project (PRP 176) and raising the weir at the IMED (Refer to Section 4.2.2).</p>	Compliant	
M3 Testing methods - concentration limits				
M3.1	<p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <p>a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or</p>	<p>Same as EPL # M3.1.</p> <p>Evidence was sighted of an approval from the EPA (Letter dated 17-Nov-15, copy provided) to vary TM-13 (As BSL did not want to use method 8). This approval applies until 2020 (or until such time as it is cancelled by the EPA).</p> <p>BSL has self-reported (as a non-compliance in the Annual Returns) that some air monitoring analysis is not fully</p>	Non-Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or</p> <p>c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</p> <p>Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</p>	<p>compliant with EPA approved methods. This is understood to relate to the existing platform at the Sinter Plant Room Dedusting Stack (EPL Pt 2). This platform only allows access to 2 out of 4 sampling ports as it does not go around the whole stack. Therefore, this condition has been categorised as 'Non-Compliant'. A recommended action has not been included since it is reported on the EPA website for EPL No. 6092 that the EPA has already "requested additional information to progress BSL application to modify sampling methods".</p>		
M8 Requirement to monitor volume or mass				
M8.1	<p>For each discharge point or utilisation area specified below, the licensee must monitor:</p> <p>a) the volume of liquids discharged to water or applied to the area;</p> <p>b) the mass of solids applied to the area;</p> <p>c) the mass of pollutants emitted to the air;</p> <p>at the frequency and using the method and units of measure, specified below.</p> <p><i>NOTE: TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.</i></p>	<p>The requirement to daily monitor total flow (KI) is included in EPL # M8.1, which also lists the approved method for Point 89 (IMED) as a weir structure and level sensor.</p> <p>The total flow is provided on the 'Manly Hydraulics Laboratory' online system (Sighted discharge plot for IMED – includes 'continuous l/s'). Data for 1-Jan-15 to current was sighted for the IMED. The maximum recorded peak was observed to be 3188 litres per second (c. June-July 2016) with most records being < 1000 litres per second. There was no discharge from c. May 2017 to current.</p>	Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s																
M8.2	<p>POINT 107 – Sinter Plant Waste Gas Cleaning Plant Stack Mass Load Monitoring</p> <p>The following pollutants shall have their mass load determined at Point 107:</p> <table border="1" data-bbox="228 512 857 916"> <thead> <tr> <th>Pollutant</th> <th>Unit of Measure</th> </tr> </thead> <tbody> <tr> <td>Fine Particulates</td> <td>Tonnes/annum</td> </tr> <tr> <td>Coarse Particulates</td> <td>Tonnes/annum</td> </tr> <tr> <td>Sulphur oxides</td> <td>Tonnes/annum</td> </tr> <tr> <td>Volatile organic compounds</td> <td>Tonnes/annum</td> </tr> <tr> <td>Nitrogen oxides</td> <td>Tonnes/annum</td> </tr> <tr> <td>Benzo(a)pyrene</td> <td>Tonnes/annum</td> </tr> <tr> <td>Benzene</td> <td>Tonnes/annum</td> </tr> </tbody> </table>	Pollutant	Unit of Measure	Fine Particulates	Tonnes/annum	Coarse Particulates	Tonnes/annum	Sulphur oxides	Tonnes/annum	Volatile organic compounds	Tonnes/annum	Nitrogen oxides	Tonnes/annum	Benzo(a)pyrene	Tonnes/annum	Benzene	Tonnes/annum	<p>Annual monitoring summary reports are included on the ‘Monitoring Data’ page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2019-nsw-monitoring-data/).</p> <p>The annual reports for 2016 and 2018 include the mass loads in tonnes/annum for Point 107, as required by EPL # M8.2.</p> <p>It was noted that the annual report for 2017 was not included on the ‘Monitoring Data’ page of the BSL website (hyperlink appears to be missing). However, this was categorised as ‘Compliant’ since no non-compliances were noted in the 2017 and 2018 Annual Returns (Copies provided – Also refer to EPA website for EPL No. 6092) for this condition.</p>	Compliant	<p>2019/6 – The hyperlink to the ‘FY2017 Annual Report’ should be reinstated on the ‘Monitoring Data’ page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2017-nsw-monitoring-data/).</p>
Pollutant	Unit of Measure																			
Fine Particulates	Tonnes/annum																			
Coarse Particulates	Tonnes/annum																			
Sulphur oxides	Tonnes/annum																			
Volatile organic compounds	Tonnes/annum																			
Nitrogen oxides	Tonnes/annum																			
Benzo(a)pyrene	Tonnes/annum																			
Benzene	Tonnes/annum																			
M8.3	<p>POINT 89 – Ironmaking East Drain Mass Load Monitoring</p> <p>The following pollutants shall have their mass load determined at Point 89:</p> <table border="1" data-bbox="228 1086 857 1238"> <thead> <tr> <th>Pollutant</th> <th>Unit of Measure</th> </tr> </thead> <tbody> <tr> <td>Total suspended solids</td> <td>Tonnes/annum</td> </tr> <tr> <td>Total zinc</td> <td>Tonnes/annum</td> </tr> </tbody> </table>	Pollutant	Unit of Measure	Total suspended solids	Tonnes/annum	Total zinc	Tonnes/annum	<p>Annual monitoring summary reports are included on the ‘Monitoring Data’ page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2019-nsw-monitoring-data/).</p> <p>The annual reports for 2016 and 2018 include the mass loads in tonnes/annum for Point 89, as required by EPL # M8.3.</p> <p>It was noted that the annual report for 2016-2017 was not included on the ‘Monitoring Data’ page of the BSL website (hyperlink appears to be missing). However, this was categorised as ‘Compliant’ since no non-compliances were noted in the 2017 and 2018 Annual Returns (Copies provided – Also refer to EPA website for EPL No. 6092) for this condition.</p>	Compliant	Refer to 2019/6.										
Pollutant	Unit of Measure																			
Total suspended solids	Tonnes/annum																			
Total zinc	Tonnes/annum																			

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
M9 Other monitoring and recording conditions				
M9.1	<p>All continuous monitoring equipment must be operated and maintained with the aim of achieving 100% availability in each licence year. Where a monitoring device does not achieve 95% availability, the licensee will report reasons and corrective actions taken to the EPA annually.</p>	<p>There are only two continuous monitoring devices on a licensed discharge point at the Sinter Plant (Including WGCP and Gypsum Plant). One is for measurement of particulates on the WGCP exhaust stack (Point 107), which has a corresponding concentration limit in the EPL (Refer to EPL # L3.4. The other is for opacity at the Sinter Plant Room Dedusting Stack (EPL Pt 2), which does not have a corresponding concentration limit in the EPL.</p> <p>BSL has not recorded any self-reports relating to a device being off-line since the previous IEA in 2016 (Refer to Section 4.2.1). It is noted in the previous IEA report that self-reports have been made by BSL in the past when a device was off-line.</p> <p>A device would need to be off-line for 5% of the time, which equates to c. 18 days per year for this condition to be triggered. This is unlikely to occur without being detected, particularly for the particulates on the Sinter Plant WGCP exhaust stack (Point 107), which is a continuous display at the control room (Refer to Section 3.6). Opacity at the Sinter Plant Room Dedusting Stack (EPL Pt 2) is also routinely monitored (via DCS at control room).</p>	Compliant	
M9.2	<p>VIDEO RECORDING OF SITE AIR EMISISONS</p> <p>The licensee must operate and maintain video surveillance cameras capable of continuously monitoring and recording emissions from the licensed premises as detailed in the table below.</p> <p><i>NOTE: TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.</i></p>	<p>BSL have installed a video recording system in accordance with EPL condition # M9.2. The Sinter Plant is covered by the site-wide cameras located at the Mellor Centre building. The camera displays were sighted at the Mellor Centre building during the site inspection on 28 February 2019.</p>	Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
REPORTING CONDITIONS				
R4 Other reporting conditions				
R4.1	<p>When the Annual Return is provided to the EPA, the licensee must also provide an 'Annual Monitoring Report'.</p> <p>Note: This report must provide the information that was previously provided quarterly under conditions R4, R4.1, R4.2 and R4.3.</p> <p>The 'Annual Monitoring Report' must be presented in a format agreed with the EPA and comprise:</p> <ul style="list-style-type: none"> a) data from any monitoring required by the conditions of this licence, grouped under the headings M2 'Requirement to monitor concentration of pollutants discharged', M4 'Environmental Monitoring', M5 'Weather Monitoring', M8 'Requirement to monitor volume or mass', M9 'Other Monitoring and Recording Condition', and Special Condition E1 'Approval for Alternative Standard of concentration for Hydrogen Sulphide Emissions'. b) data from any monitoring required by Conditions: 'O4.5 - Coke Ovens', 'O4.10 -BOS Roof Emissions', 'O4.13 BOS Kish Tipping', 'O4.14 Hot Metal Pouring', 'O4.17 - SRG Venting', and 'O4.19 Spectrus CT1300 Biocide'. c) other monitoring data required by this licence as requested by the EPA d) any additional data as requested by the EPA e) reasons for any non-compliance/s and omitted results, together with actions taken to prevent a recurrence of any non-compliance or omitted results. 	<p>This condition applies for the entire PKSW, so is not specifically applicable to the OPUP and WGCP (Including Gypsum Plant). Therefore, the IEA did not include a detailed review of this EPL condition. Nonetheless, BSL would appear to be compliant based on submission of the Annual Returns (Refer to CC # W-A3.1) and the data reported on the 'Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2019-nsw-monitoring-data/).</p> <p>Note: Items (b), (f) and (g) do not apply to the OPUP or WGCP (Including Gypsum Plant).</p>	Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>f) data from any new source coal(s) used in the Pulverised Coal Injection (PCI) facility over the previous reporting year. This data must include laboratory analysis of primary physical and chemical characteristics of the new source coal(s) to show they are consistent with other approved PCI coals. That is, moisture content, ash, volatile matter, fixed carbon, total sulphur, phosphorous, calorific value and trace metal concentrations (POEO Clean Air Regulation, Type I and Type II substances).</p> <p>g) For Acetylene gas Lime Slurry Diverted to Alliance and Recycling Lime Pits:</p> <p>i) The licensee must report to EPA in the Annual Return the total volume of lime slurry diverted to the Alliance and Recycling Lime Pits.</p> <p>ii) The information must include a graph showing a comparison of the previous years.</p>			

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
R4.2	<p>By 1 June 2016 monitoring data from ambient fine particle monitoring (TEOMs (PM10)) and weather stations must be available in real time on a publicly accessible web site in a format approved by the EPA.</p> <p>Note: In establishing the web site, the licensee should consider the publishing requirements listed in EPA Requirements For Publishing Pollution Monitoring Data.</p>	<p>Monitoring data is accessible via the 'BlueScope Port Kembla Steelworks Ambient Monitoring Data Portal' at: https://piinthesky.gtsgroup.com.au/Bluescope.</p> <p>The reported hourly average data includes: PM10 (ug/m³), Wind Speed (km/hr) and Wind Direction (deg.).</p> <p>The data currently on the 'BlueScope Port Kembla Steelworks Ambient Monitoring Data Portal' website dates back to February 2018. BSL advised that data from 1-Jun-16 is no longer been shown since the format was modified in February 2018. An email notification from BSL to the EPA of the improved map and data setup was sighted (Email dated 20-Feb-18, copy provided).</p> <p>The minutes of the EPA liaison meeting on 9-Jun-16 (Copy provided) confirm that real time monitoring was available from 1-Jun-16.</p>	Compliant	
R4.3	<p>Ambient Air Monitoring Network Report</p> <p>When the Annual Return is provided to the EPA, the licensee must also provide an 'Ambient Air Monitoring Network Report'. The report must include the following information for the relevant reporting period:</p> <ol style="list-style-type: none"> summarised or graphically presented ambient air quality monitoring results assessed against relevant air quality standards and criteria; comparison of licensee air quality data against other air quality data (e.g. OEH stations / ANSTO monitoring); presentation of long-term trends; a narrative of a-c above, and a quality assurance statement. 	<p>The Ambient Air Monitoring Network is for the entire PKSW, so is not specifically applicable to the OPUP and WGCP (Including Gypsum Plant). Therefore, the IEA did not include a detailed review of this EPL condition. Nonetheless, BSL would appear to be compliant based on the findings of the Independent Peer Review – Also refer to EPL # R4.4.</p>	Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
R4.4	<p>a) By 1 December 2016 the licensee must submit a review of the Ambient Air Monitoring Network.</p> <p>i) The review must assess all elements of the program including the number of monitors, locations, adequacy of the instrumentation to undertake the monitoring, the availability of more contemporary monitoring / analytical methods, monitoring frequency, pollutants monitored, and also propose a review frequency.</p> <p>ii) In reviewing the pollutants monitored the process must include but may not be limited to:</p> <p>a. the inclusion of PM2.5 and sulphur oxides into the network;</p> <p>b. the premises contribution to the total pollutant load to the local air shed using contemporary emissions inventories (e.g. the NSW EPA emissions inventory database and the National Pollutant Inventory); and</p> <p>c. other monitoring undertaken in the Port Kembla area (including e.g. ANSTO, Dustrak, OEH monitoring station).</p> <p>b) By 1 December 2018, the licensee must submit an Independent Peer Review of the Ambient Air Monitoring Network. The review must be undertaken by an independent, suitably qualified & experienced third party approved by the EPA. The scope of the peer review and the reviewer must be approved by the EPA in advance. The peer review must assess the items listed in (i) and (ii) above and include comments, recommendations, and a statement on the adequacy of the review.</p>	<p>The Ambient Air Monitoring Network is for the entire PKSW, so is not specifically applicable to the OPUP and WGCP (Including Gypsum Plant). Therefore, the IEA did not include a detailed review of this EPL condition. Nonetheless, BSL would appear to be compliant based on the findings of the Independent Peer Review report (Dated 23-Nov-18, copy provided).</p> <p>It is reported in the Independent Peer Review report that the review included a detailed review of the following documentation:</p> <ul style="list-style-type: none"> • <i>140508 Ambient Risk Assessment Submission.pdf</i> • <i>160829 R4.3 Ambient Monitoring Annual Report 15~16.pdf</i> • <i>161201 R4.4 Ambient Air Monitoring Network Review Report.pdf</i> • <i>170829 R4.3 Ambient Monitoring Annual Report 16~17.pdf</i> • <i>180829 R4.3 Ambient Monitoring Annual Report 17~18.pdf</i> <p>The independent peer review appears to have addressed items (i) and (ii). It is reported in the Independent Peer Review report that:</p> <ul style="list-style-type: none"> • <i>Review of the network appears appropriate, and no additional frequency is considered advantageous.</i> 	<p>Compliant</p>	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<ul style="list-style-type: none"> <i>the majority of the monitoring network adheres to the guidance contained within the EPA's Approved Methods for the Monitoring and Assessment of Air Pollutants in NSW. It is acknowledged that new techniques and technologies are being developed for ambient air quality monitoring, including the advent of so-called "low cost sensors". However, such novel techniques remain largely within the development stage, and are considered inappropriate / unhelpful for regulatory monitoring networks at this stage.</i> 		
R4.5	<p>A change of colour in any waters does not need to be reported as a non-compliance. Whenever the licensee detects an abnormal colour change, a sample should be taken and analysed for the parameters applying at the discharge point to determine if there has been a licence breach. If a licence breach is not revealed by the analysis of the sample then there is no need to report it in the Statement of Compliance.</p>	<p>There are no records of abnormal colour changes being self-reported to the EPA since the previous IEA in 2016 (Refer to Section 4.2.1).</p> <p>No visible discolouration of the IMED or harbour was evident during the site inspection on 1 March 2019.</p> <p>The IMED Drainage Diversion Project (PRP 176) has been completed since the previous IEA in 2016. As a result, the IMED does not normally discharge to the harbour under dry weather conditions (Refer to Section 4.2.2).</p>	Compliant	
SPECIAL CONDITIONS				
E5 Sinter Machine Short Term Bypass Arrangements				
E5.1	<p>Background</p> <p>To facilitate the ongoing safe and effective operation of the Waste Gas Cleaning Plant (WGCP) serving the Sinter Plant, the following conditions permit emissions from the Sinter Plant to bypass the WGCP following treatment in the electrostatic precipitators. The bypass would occur for limited periods of time in the following circumstances:</p> <p>(a) for a proactive response to plant control data/indicators or emergency shutdown; or</p>	<p>EPL # E5.1 is a background note for EPL # E5.2 to E5.10 (See below for findings and compliance assessment).</p> <p>The conditions listed in Section E5 of the current EPL were added after the WGCP stack fire in 2014. These conditions have been triggered once since the previous IEA in 2016.</p>	Refer to EPL # E5.2 to E5.10	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	(b) for preventative maintenance.			
E5.2	Requirements Unless otherwise agreed in writing by the EPA, the licensee must comply with the following conditions whenever the bypass occurs.	EPL # E5.2 is an explanatory note for EPL # E5.3 to E5.10 (See below for findings and compliance assessment).	Refer to EPL # E5.3 to E5.10	
E5.3	Notification and Approval 1. Immediately after the licensee becomes aware of any WGCP bypass, which is not approved for preventative maintenance, the licensee must notify the EPA and provide all relevant information about it. 2. The licensee must provide written details of the notification to the EPA within 7 days of the date on which the WGCP bypass occurred. 3. The licensee must obtain approval in writing from the EPA prior to any preventative maintenance activities that require WGCP bypass.	BSL notified the EPA of the bypass (letter dated 29-May-18, copy provided). Note: Item 3 was not triggered as the bypass on 23-28 May 2018 was due to a breakdown and was not due to “preventative maintenance activities”.	Compliant	
E5.4 & E5.5	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point. <i>NOTE TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.</i> For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table. <i>NOTE TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.</i>	Point 151 (Number 3 Sinter Machine Stack) EPL # E5.4 identifies EPL Pt 151 (No. 3 Sinter Machine Stack) as being a point with limits for emission of pollutants to the air. The current discharge limits for Point 151 are specified in EPL # E5.5. The discharge limits only apply during bypass conditions (Refer to EPL # 5.2). Monitoring results for Point 151 are reported on the ‘Monitoring Data’ page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2018-nsw-monitoring-data/). As at 17 April 2019, this website was observed to include a report for 23-28 May 2018 (i.e. during bypass conditions). The reported data indicates a non-compliance with the EPL limit for solid particles (Refer to Section 4.2.1).	Non-Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		<p>Monitoring results for Point 151 are also recorded in the 'EHS Data Monitor Pro' web-based application. Data recorded for 23-28 May 2018 (i.e. during bypass conditions) was sighted for EPL Pt 151 (Copies provided of graphical data).</p> <p>This condition has been assessed as 'Non-Compliant' due to the exceedance of the limit for solid particles at Point 151 (No. 3 Sinter Machine Stack). A recommendation has not been included as no further exceedances have been recorded and BSL is currently installing new Continuous Emission Monitors (CEMs) (Refer to Section 4.2.2).</p>		
E5.6	<p>For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:</p> <p><i>NOTE TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.</i></p> <p>Note: Special Method 1 means continuously in accordance with US EPA Performance Specification 11 Specifications and Test Procedures for Particulate Matter Continuous Emission Monitoring Systems at Stationary Sources.</p> <p>Note: Type 1 substance means the elements antimony, arsenic, cadmium, lead or mercury or any compound containing one or more of those elements.</p> <p>Type 2 substance means the elements beryllium, chromium, cobalt, manganese, nickel, selenium, tin or</p>	<p>Monitoring results for Point 151 are reported on the 'Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2018-nsw-monitoring-data/). As at 17 April 2019, this website was observed to include a report for 23-28 May 2018 (i.e. during bypass conditions). Monitoring undertaken during the bypass appears to have complied with the monitoring requirements applicable for a 6-day duration. In some cases, the sample frequency significantly exceeded the frequency specified in this condition.</p>	Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>vanadium or any compound containing one or more of those elements.</p> <p>Limits for Type 1 and Type 2 substances are specified in the Protection of the Environment Operations (Clean Air) Regulation 2010.</p>			
E5.7	<p>Operation</p> <ol style="list-style-type: none"> 1. The duration of the WGCP bypass must be minimised as far as practicable. 2. The licensee must notify the EPA in writing as soon as practicable if the duration of the bypass is likely to exceed: <ol style="list-style-type: none"> a) 28 days for a proactive response or emergency shutdown; and b) 10 weeks for any preventative maintenance. 	<p>This has been categorised as compliant since the only by-pass since the previous IEA occurred for c. 6 days (23-28 May 2018).</p>	Compliant	
E5.8	<p>Duty to Minimise or Prevent Air Pollution</p> <p>During any bypass the licensee must carry on any activity or operate any plant by such practicable means as may be necessary to prevent or minimise air pollution. These practicable means may include, but not necessarily be limited to:</p> <ol style="list-style-type: none"> a) Dealing with materials in a proper and efficient manner at all times. b) Maintaining and operating plant and equipment in a proper and efficient manner. c) Reductions in the nature and quantity of materials processed that could result in the discharge of substances likely to cause harm to the environment. d) Restrictions on the throughput (tonnes/per hour) of materials processed by the Sinter Plant. 	<p>This has been categorised as non-compliant due to exceedance of the limit for solid particles at Point 151 (No. 3 Sinter Machine Stack) – Refer to EPL # E5.4 & E5.5.</p>	Non-Compliant	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
E5.9	<p>Timely Public Access to Air Quality Data</p> <p>The licensee must operate a web based service to ensure the community has access to timely, relevant and meaningful continuous emission monitoring data for the Sinter Machine Short Term Operational Arrangements. This must include but not be limited to continuous particle monitoring at the following locations:</p> <ul style="list-style-type: none"> (a) In stack at point 151. (b) Ambient air quality. <p>This service must be developed in consultation with the EPA.</p>	<p>Monitoring data is reported monthly on the 'NSW Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2019-nsw-monitoring-data/).</p> <p>The website was observed to include a 'May 2018 Sinter Machine Bypass Monitoring Report'. This report includes monitoring results at EPL Point 151 and ambient air quality at EPL Points 141 and 152.</p>	Compliant	
E5.10	<p>Requirement to record bypasses of the WGCP</p> <p>The licensee must record the following details in relation to each bypass of the WGCP and provide the information to the EPA upon request:</p> <ul style="list-style-type: none"> a) The reason for the bypass; b) The start time and date; and c) The finish time and date. 	<p>BSL notified the EPA of the bypass (letter dated 29-May-18, copy provided). This included the information required by items a) and b) and c).</p>	Compliant	
E7 Sinter Plant Waste Reuse Trials				
E7.1	<p>Background</p> <p>The licensee proposes to undertake trials in relation to the reuse of Sinter Plant Waste Gas Cleaning Plant activated char undersized (ACU) back to the Sinter Plant. The objective of the trials is to collect accurate and reliable information on the reuse of the ACU and demonstrate that the environment and human health are protected at all times.</p>	<p>EPL # E7.1 is an explanatory note for EPL # E7.2 to E7.7 (See below for findings and compliance assessment).</p> <p>Note: There have been two trials since the previous IEA in 2016.</p>	Refer to EPL # E7.2 to E7.7	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	<p>Requirements</p> <p>Unless otherwise agreed in writing by the EPA, the licensee must comply with the following conditions.</p>			
E7.2	<p>The licensee must submit an ACU trial proposal and obtain approval in writing from the EPA prior to commencing the trial.</p>	<p>Approvals were received in writing from the EPA for the two trials (Letters dated 15-Jul-16, 19-Jul-16 and 31-Jan-18, copies provided). It is noted in these letters that the ACU trial proposals were submitted to the EPA on 13-Jun-16 and 14-Dec-17.</p>	Compliant	
E7.3	<p>The licensee must undertake the trial as outlined in the Proposal unless otherwise agreed in writing by the EPA.</p>	<p>Both trials were completed prior to the IEA; therefore, it was not possible to fully verify compliance with this condition. However, the EPA has responded positively (letter dated 8-Nov-17, copy provided) to BSL's report for the first trial (dated Jul-17, copy provided) and has approved the second trial (letter dated 31-Jan-18). The reports for the first and second trials (dated Dec-18, copy provided) appear to be comprehensive. Therefore, this condition was categorised as compliant.</p>	Compliant	
E7.4	<p>The licensee must comply with all conditions of this licence during any ACU trial. This includes, but is not limited to, Limit Conditions, Maintenance of Plant and Equipment, and Notification of Environmental Harm.</p>	<p>Both trials were completed prior to the IEA; therefore, it was not possible to fully verify compliance with this condition. However, no non-compliances were reported in BSL's reports for the first trial (dated Jul-17, copy provided) or the second trial (dated Dec-18, copy provided).</p>	Compliant	
E7.5	<p>During any trial the licensee must retain and test / classify the following materials prior to discharge, release, or appropriate management or disposal: all Sulphur Rich Gas Plant reject waste water, filter cake generated at the Springhill waste water treatment plant, ACU generated during the trial, and Sinter Plant electrostatic precipitator dust.</p>	<p>Both trials were completed prior to the IEA; therefore, it was not possible to fully verify compliance with this condition. However, the ACU and precipitator dust generated during the 2nd trial was observed during the site inspection on 1 March 2019 (Refer to Table 13).</p>	Compliant	


EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
E7.6	<p>Following the completion of the ACU trial the licensee must submit a written report to the EPA. The report must include but may not be limited to:</p> <ul style="list-style-type: none"> a) confirmation that monitoring results are below licence limits and Health Risk Assessment criteria; b) A comparison / validation of the proposal predictions against the trial monitoring results or findings for the char composition, waste or output stream composition, mass balance / partitioning modelling assessment, and air emissions modelling; c) A mass balance generated from the trial over a defined time period; d) An assessment on the fate of dioxins, radionuclides and metals emissions and discharges. This should include outlining any change in emissions and discharges from typical operations; e) An assessment on the possible “cycling up” of pollutants in emissions and discharges to the environment and in the other output streams generated through trial; f) An assessment of the quantities of: ACU used in the trial, the second generation ACU produced, and the other output streams generated; g) An assessment of the potential changes to waste classifications (i.e. Electrostatic precipitator dust and ACU generated during the trial), h) A discussion on any changes to sinter quality, and i) A summary of the cost/benefit analysis for ACU reuse. 	<p>BSL’s reports were sighted for the first trial (dated Jul-17, copy provided) and the second trial (dated Dec-18, copy provided). These appear to have addressed the items listed in this condition.</p>	<p>Compliant</p>	


EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
E7.7	<p>During any ACU trial the licensee must carry on any activity or operate any plant by such practicable means as may be necessary to prevent or minimise air pollution. These practicable means may include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> a) Dealing with materials in a proper and efficient manner at all times. b) Maintaining and operating plant and equipment in a proper and efficient manner. c) Reduction in the nature and quantity of materials processed that could result in the discharge of substances likely to cause harm to the environment. d) Restrictions on the throughput (tonnes per hours) of materials processed by the Sinter Plant. e) Limiting the number of variables which effect the emission characterisation and the composition of the process outputs. Where variables cannot be limited they should be quantified. 	<p>Both trials were completed prior to the IEA; therefore, it was not possible to fully verify compliance with this condition. However, no non-compliances were reported in BSL's reports for the first trial (dated Jul-17, copy provided) or the second trial (dated Dec-18, copy provided).</p>	<p>Compliant</p>	



B.3 Site and Equipment Inspections


Most findings from the site and equipment inspections are included in Appendix B.1 and B.2. Additional findings are listed below.

Table 13 Audit Findings (Site and Equipment Inspections – 28 February and 1 March 2019)

ID #	Evidence and Finding/s	Recommended Action/s
1	<p>Trucks were observed to be washing down roadways.</p> <p style="text-align: center;">Photograph 13 Washing Down of Roadways (1 March 2019)</p> 	

ID #	Evidence and Finding/s	Recommended Action/s
2	<p>The liquid level in the IMED was observed to be at a low level.</p> <p>Photograph 14 IMED (1 March 2019)</p> 	

ID #	Evidence and Finding/s	Recommended Action/s
3	<p>The weir at the IMED was observed to have been raised (Refer to Section 4.2.2).</p> <p>Photograph 15 Height of Weir Increased at IMED (1 March 2019)</p> <div data-bbox="257 422 898 906"></div> <div data-bbox="974 422 1615 906"></div>	

ID #	Evidence and Finding/s	Recommended Action/s
4	<p>The ACU and precipitator dust generated during the 2nd ACU trial was observed to be stored in a shed (Refer to EPL # E7.5).</p> <p>Photograph 16 Storage of ACU and Precipitator Dust from ACU Trial (1 March 2019)</p> 	

Appendix C Planning Secretary Audit Team Agreement



Planning &
Environment

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Email: Georgia.Dragicevic@planning.nsw.gov.au

Mr David Jones
Business Engineer
BlueScope Steel Limited
Five Islands Road
PORT KEMBLA NSW 2505

Dear Mr Jones

**Waste Gas Cleaning Plant (DA No 26-02-01)
Sinter Plant Ore Preparations Upgrade Project (MP 06_0229)
Independent Environmental Audit 2018**

I refer to your email letter dated 19 December 2018 seeking approval of Mr Philip Skinner of Arriscar Pty Limited as the lead auditor for the upcoming Waste Gas Cleaning Plant and the Sinter Plant Ore Preparations Upgrade Project, in accordance with Schedule 2, Condition 7.6 of Development Consent DA No 26-02-01 and Schedule 2, Condition 4.1 of Project Approval MP 06_0229, respectively (the approvals).

Having considered the qualifications and experience of Mr Skinner, the Secretary endorses the appointment of Mr Skinner to undertake the audit in accordance with Schedule 2, Condition 7.6 and Schedule 2, Condition 4.1 of the respective approvals. This approval is conditional on Mr Skinner being independent of the development.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing and in accordance with the Independent Audit Post Approval Requirements dated June 2018. A copy of the requirements can be located at <http://planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>.

The audit report is to include the following:

- consultation with the relevant agencies;
- a compliance table indicating the compliance status of each condition of approval and any relevant EPL;
- not use the term "partial compliance";
- recommend actions in response to non-compliances;
- review the adequacy of plans and programs required under this consent; and
- identify opportunities for improved environmental management and performance.

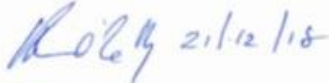
Within two months of commissioning the audit, BlueScope is to submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations. Prior to submitting the audit report to the Secretary, it is recommended that BlueScope review the report to ensure it complies with the relevant consent condition.

Department of Planning & Environment
L2, 84 Crown Street Wollongong NSW 2500 | PO Box 5475 Wollongong NSW 2520 | T 02 4247 1852 | F 02 4224 9470 | www.planning.nsw.gov.au

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Should you have any enquiries in relation to this matter, please contact Georgia Dragicevic, Senior Compliance Officer, on telephone number (02) 4224 9477 or by email to Georgia.Dragicevic@planning.nsw.gov.au

Yours sincerely



Katrina O'Reilly
Team Leader Compliance
as nominee of the Secretary

Appendix D Independent Audit Declaration Form

Project Name	Sinter Machine Emission Reduction Project (SMERP) including Waste Gas Cleaning Plant (WGCP); Gypsum Plant; and, Ore Preparation Upgrade Project (OPUP)
Consent Number	DA No 26-02-01, MOD-50-4-2005-I and MOD 2; and DA No 06-0229, MOD 1.
Description of Project	Sinter Plant, Waste Gas Cleaning Plant and Gypsum Plant
Project Address	Lot 1 DP 606434, Port Kembla Steelworks, Five Islands Road, Port Kembla, NSW 2505
Proponent	BlueScope Steel Ltd
Title of Audit	Independent Environmental Audit
Date	23 April 2019

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

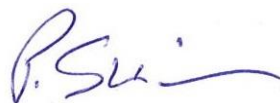
- the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2018);
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

Name of Auditor Philip Skinner

Signature



Qualification Exemplar Global AU: *Management systems auditing*
 Exemplar Global EM: *Environmental management systems*
 Exemplar Global TL: *Leading management systems audit teams*

Company Address Level 26, 44 Market Street, Sydney NSW 2000