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21 April 2022

RE: 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.

Dear Kiersten,

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 sincerely,

Richard Lorenc
Ore Preparation Manager
BlueScope Steel (AIS) Pty Ltd

Independent Environmental Audit (2022)

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

20 April 2022

Doc. No.: J-000522-REP-001

Revision: 0

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A	11 April 2022	PS	Draft for client review.	JPM	PS
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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 2022 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 guidelines *Independent Audit, Post-Approval Requirements* [Ref. 8]. It included four major verification activities:

- Agency and community consultation;
- Personnel interviews;
- Document reviews; and
- Site and equipment inspections.

Audit interviews and a site inspection were undertaken on 22-24 February 2022.

The overall findings of the IEA are 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 NSW EPA issued two penalty notices (Notice Numbers: 1597434 and 1597435, Issue date: 22 July 2020) for the PKSW since the previous IEA in 2019. The penalty notices related to six exceedances of the EPL concentration limit for dioxins and furans at LDP 151 during the WGCP bypass in March 2020 and April 2020. Investigations and actions have been implemented by BSL to prevent reoccurrence and no exceedances were recorded during a subsequent bypass in 2021.
- Despite the two penalty notices, 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 public complaints since the previous IEA in 2019 (refer to Section 4.2.1).

- No non-compliances related to exceeding limits in the EPL since the previous IEA in 2019 (refer to Section 4.2.1), other than for the dioxins and furans during the WGCP bypass in2020 (as noted above).
- Programs being undertaken by BSL to reduce potential future impacts (i.e. investigating the re-use of 'Activated Char Undersized' (ACU) and Electrostatic Precipitator (EP) dust – Refer to Section 4.2.2).

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. The overall number of non-compliances has reduced when compared to the previous IEA in 2019.

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Notation

Abbreviation	Description
A/G	Above Ground
AC	Active Char
ACU	Activated Char Undersized
Arriscar	Arriscar Pty Limited
AS	Australian Standard
ASP	Australian Steel Products
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
Dioxins/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
DPIE	NSW Department of Planning, Industry and Environment
EMP	Environmental Management Plan
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
FDMS	Fugitive Dust Management System
g/m3	Grams per cubic metre
H_2O	Water
HCl	Hydrochloric Acid
HSEC	Health, Safety, Environment and Community
IBC	Intermediate Bulk Container
IEA	Independent Environmental Audit

Abbreviation	Description
IMED	Iron Making East Drain
ITP	Inspection and Test Plan
kPag	Kilopascal (gauge)
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)
NZPac	New Zealand & Pacific Steel
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

Abbreviation	Description
SEE	Statement of Environmental Effects
SEQ	Safety, Environment, and Quality
SHI	Sumitomo Heavy Industries
SMERP	Sinter Machine Emission Reduction Project
SMS	Safety Management System
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 (SO_2), 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 2022 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 2022 IEA (refer to Section 1.2) was approved by the Department of Planning, Industry and Environment (DPIE) and the audit interviews and a site inspection were undertaken on 22-24 February 2022.

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 (SO_2), 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 (24 February 2022)

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 55% of its approved 6.6 million tonnes per annum 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 30 years' experience in management system implementation and auditing. He is a 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, Industry 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).

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.

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

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

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 guidelines *Independent Audit, Post-Approval Requirements* [Ref. 8], consultation with relevant stakeholders (refer to Section 2.2) and the requirements specified in the DPIE'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 conditions of consent 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 2022 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);

      Note: Some conditions from the EPL have been removed or modified since the previous IEA in 2019. These changes are highlighted in this report using red text.

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 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 February-March 2019.

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 guidelines *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 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, 4.31, 4.33, 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 Additional 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, O4.19
5	MONITORING AND RECORDING CONDITIONS	M1.1-M1.3, M2.1, M2.2, M2.3, M2.5, M2.6, M3.1, M3.2, M8.1-M8.3, M9.1, M9.2
6	REPORTING CONDITIONS	R4.1-R4.5
9	SPECIAL CONDITIONS	E5.1-E5.10, E5.11-E5.13, 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;
- Personnel interviews;
- Document reviews; and
- Site and equipment inspections.

The audit interviews and site inspection were undertaken on 22-24 February 2022.

2.3.1 Agency and Community Consultation

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, Industry and Environment (DPIE) [9-Feb-2022 and 6-Apr-2022];
- Environment Protection Authority (EPA) [9-Feb-2022 and 9-Mar-2022]; and
- Department of Health (Health NSW) [9-Feb-2022].

The auditor also contacted (by phone) a member of the community consultative committee [7 April 2022]. The community consultative committee representative noted that BlueScope was attending the scheduled committee meetings and had been responsive to the committee members queries.

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

The exceedances of the EPL concentration limits for dioxins and furans at EPL Pt 151, which occurred during the bypass in 2020 (refer to Section 4.2.1), were also discussed and no major issues were raised.

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 BSL 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
Anita Rojas	Senior Environmental Advisor - Ironmaking
Katrina Tully	Acting Ore Preparation Operations Manager
Kim Lam	Business Engineer
Rachel Stephen	Environment Advisor - Ironmaking
Tim Webb	Operations 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 Katrina Tully (Acting 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 24 February 2022. All operational locations (as listed in Section 2.4) were observed during these inspections, except for the control room (due to COVID restrictions).

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 guidelines *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 (Note: Decommissioned – refer to Section 3.3.7);
- 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 photographs show the Sinter Plant building and the WGCP.

Photograph 2 Sinter Plant Building (22 February 2022)

Interior (Strand Level)

Interior (Ground Level)

Exterior (North)

Exterior (East)

Photograph 3 WGCP (22 February 2022)

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

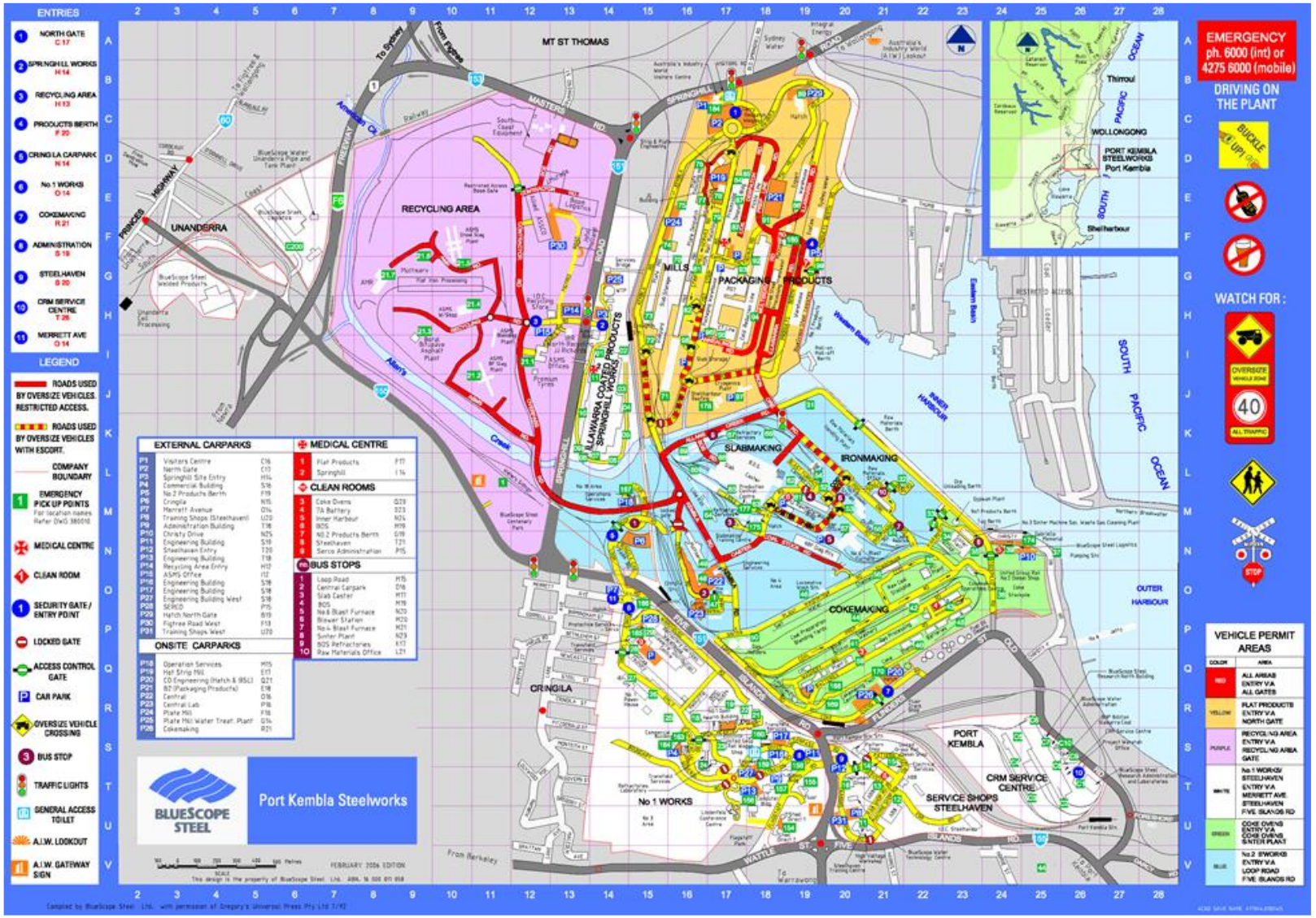
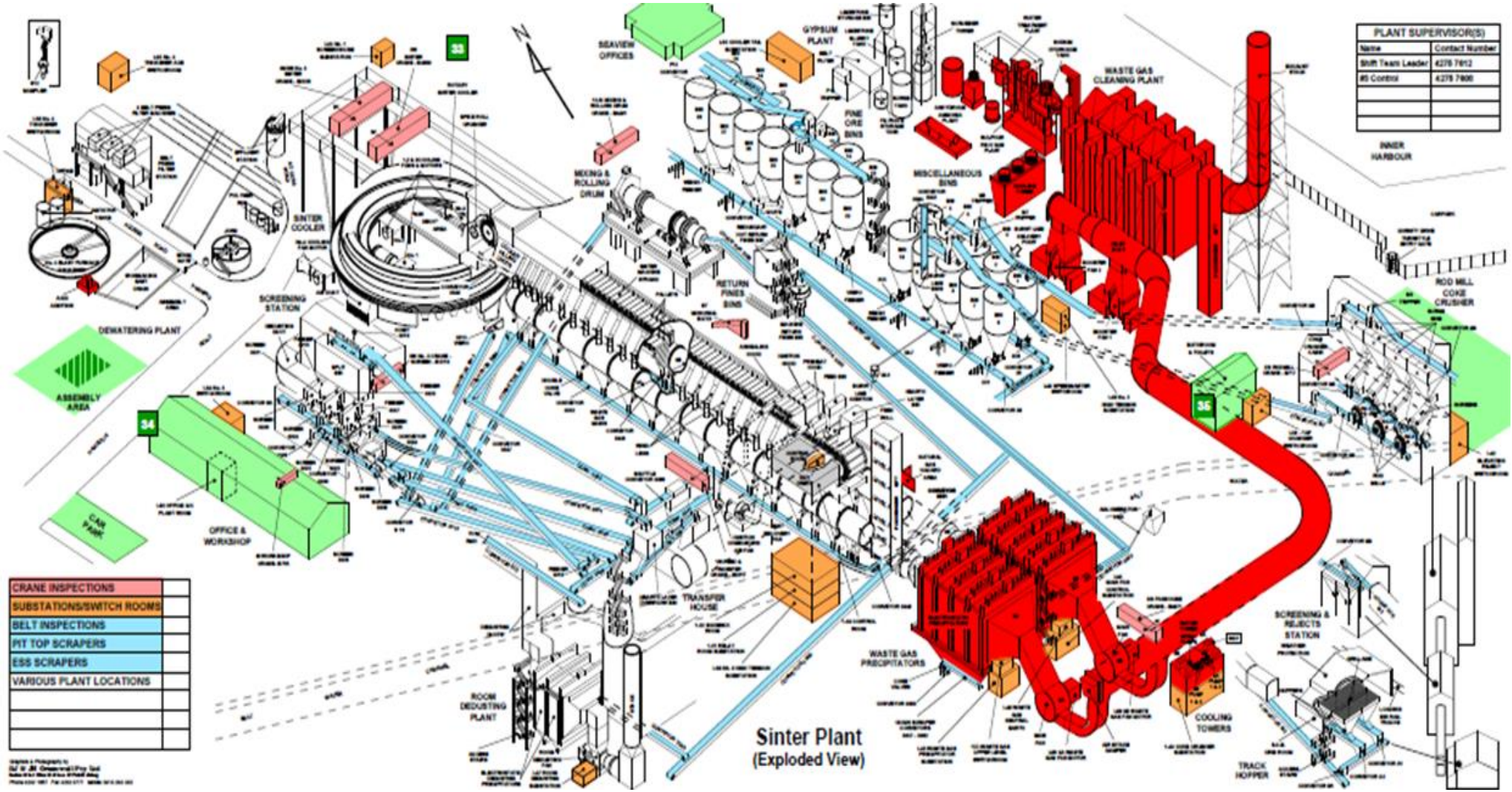


Figure 2 Layout of Sinter Plant (Including WGCP and Gypsum Plant)



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

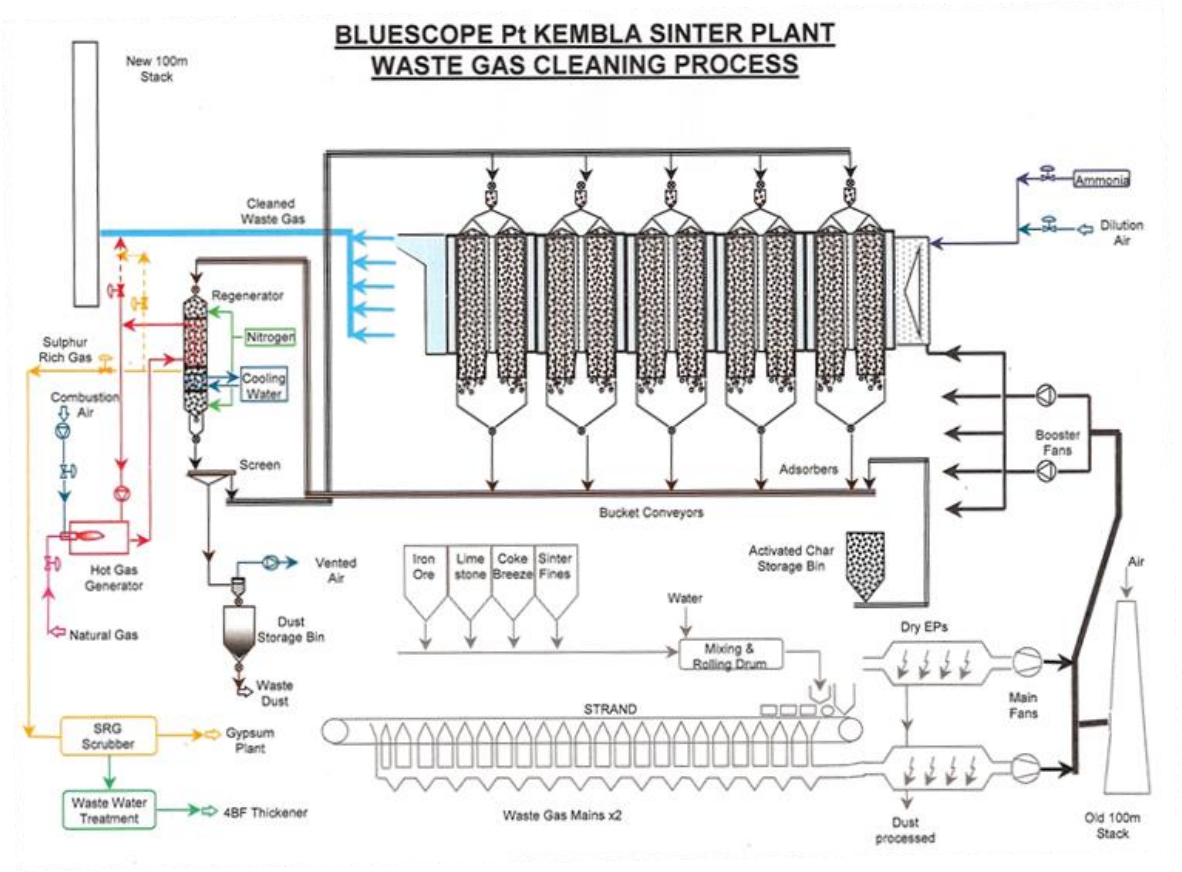
The Sinter Plant building is equipped with a ventilation system to collect air borne dust. The air drawn from the building is passed through precipitators and then discharged to atmosphere via the Sinter Machine Room Dedusting Stack (EPL Point 2 – Refer to Photograph 4).

Photograph 4 Sinter Machine Room Dedusting (Duct and Precipitators in Foreground and Stack in Background) (24 February 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 SO_2 is adsorbed on the char from the waste gas and dust filtered, and the clean gas is directed to the stack.

Injection of Ammonia gas was discontinued prior the previous IEA in 2019. The effects of this change on NO_x emissions were described in the 2019 IEA report.

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 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 wastewater 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. The storage and tanker unloading facilities are still present; however, these have now been decommissioned and are isolated from the WGCP.

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 5 Storage Area for Gypsum (24 February 2022)

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 m^3 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 pipeline 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 (90m^3 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 pipeline 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

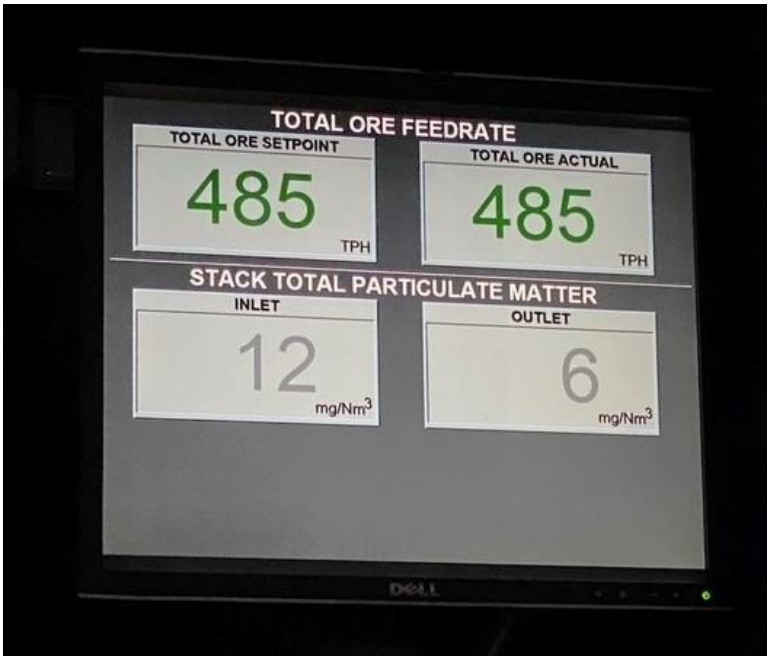
The Sinter Plant (including the WGCP and Gypsum Plant) is controlled from the Sinter Plant control room, located at the strand level in the Sinter Plant building. The control room is normally occupied at all times by a process operator.

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 6).

Photograph 6 Display of Stack Total Particulate Matter (22 March 2022)



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	*
	2 x A/G Tanks	2.2	Nitrogen	90 m^3 per tank (600 kPag)
BF17	A/G Tank	8	Corrosive Liquid, Acidic, Inorganic, N.O.S.	75,000 litres

* The Ammonia storage tank has been decommissioned; however, the storage and tanker unloading facilities are still present (refer to Section 3.3.7).

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
2. Legal and Other Requirements
3. Risk Management (Note: Includes management of change)
4. Fit for Work
5. Training and Competency
6. Engagement, Consultation and Communication
7. Document and Record Control
8. Material Supply and Contractor Management
9. Project Management
10. Process, Plant and Equipment integrity
11. Emergency Preparedness and Response
12. Incident Management
13. Preventive and Corrective Action
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 'ASP 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. 6, dated February 2022, copy provided). Note: This has been updated since the previous IEA in 2019 to include the No. 3 Sinter machine Stack (EPL Pt 151) and exclude Anhydrous Ammonia (included in register but 'greyed out'):

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
No. 3 Sinter machine Stack (EPL Pt 151)	Discharge during Sinter Plant WGCP bypass 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
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
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 April 2019 to February 2022.

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

- Six exceedances of the EPL concentration limit for dioxins and furans at LDP 151 during the WGCP bypass in March 2020 and April 2020. These non-compliances are included in the Annual Return to the EPA and are described further below. Investigations and actions have been implemented by BSL to prevent reoccurrence and no exceedances were recorded during a subsequent bypass in 2021.
- Twenty nine (29) 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.
- Three self-reports to the EPA and one enquiry from the EPA regarding visible emissions from the Sinter Plant WGCP Stack (EPL Point 107) or the Sinter Machine Room Dedusting stack (EPL Point 2). These were short duration events that occurred during a start-up.
- Some minor spillages (e.g. due to failure to secure truck tail gate) and/or dust emissions (DER 3) on site and events involving minor fall out of dust onto cars parked at BSL's Christy Drive carpark.
- No complaints from members of the public (e.g. due to noise, odours, dust emissions, etc.).
- Some events identifying domestic waste in a Sinter Plant bin.
- Discoloration, presence of foam or pH 'out of range' for the water in the IMED (Note: The IMED Drainage Diversion Project (PRP 176) was completed in August 2017. As a result, the IMED does not normally discharge to the harbour under dry weather conditions and the monitoring results for Pt 89 (IMED) currently comply with EPL limits - refer to EPL # L3.5, M2.5, M2.6 and M8.1).

The following key points relate to the six exceedances of the EPL concentration limit for dioxins and furans at LDP 151 during the WGCP bypass in March 2020 and April 2020:

- On 8 May 2020, a formal incident report was submitted to the EPA; however, the cause of the incident had not yet been determined. A response to the Show Cause letter received from the EPA on 22 June 2020 was submitted by BSL on 6 July 2020. At the time of this submission, the cause remained unknown and an investigation was underway.

- On 11 December 2020, an addendum to the Incident Report was submitted to the EPA. Following a subsequent meeting on 28 January 2021, the EPA issued a letter requesting additional information and points of clarification be incorporated into an amended report. The resulting *Amended Addendum to Dioxins and Furans Sinter Plant Exceedances Incident Report* (copy provided) was submitted to the EPA on 7 May 2021.
- BSL has concluded in the Amended Addendum report that the dioxin / furan concentrations are influenced by the presence of a hematite/magnetite fine ore in the blended bed, which can be managed through appropriate ore blending.
- The minimum amount of the hematite/magnetite fine ore is put into the premix blend at the stack and the rest is added via a fine ores bin at the Sinter Plant (sighted during site inspection on 24 February 2022). Evidence of adjusting the bed composition prior to most recent bypass in 2021 was sighted ("Sinter Plant Bedly Report", copy not provided). Adding the extra hematite/magnetite fine ore via a fine ores bin enables it to be removed at short notice if there is an emergency bypass.
- Additional samples were taken prior to the bypass in 2021, which showed compliance with the EPL concentration limits for dioxins and furans (data provided for 14/6/2020). Extensive testing was also undertaken during the 2021 bypass and BSL expect this to be a requirement for all future bypasses (refer to EPL # E5.6). BSL advised that a quarterly dioxin measurement will also be undertaken at inlet to WGCP and that one of these tests will include the bypass blend on the sinter machine.
- An external consultant undertook an independent health risk assessment (dated 25 May 2020, copy provided) and concluded that potential exposure during the 2020 bypass was below the recommended maximum acceptable level.
- It is reported in the EPA Penalty Notice (dated 22 July 2022, copy provided) that "In response to the non-compliances BSL undertook air emissions modelling populating the site wide PRP 131 model with the dioxin emissions data. The modelling showed compliance with relevant environmental and health criteria (Ground Level Concentration criteria)".
- Three additional 'out-of-session' meetings were held to present the findings to the local community consultation committee (minutes available at http://bsi-illawarraweb-prod.elasticbeanstalk.com/community/community-consultative-committee/).

4.2.2 Predicted and Actual Environmental Impacts

Two changes were identified during the IEA with the potential to affect future environmental impacts of the Sinter Plant (including WGCP and Gypsum Plant):

- Re-Use of 'Activated Char Undersized' (ACU); and
- Re-Use of material collected in the Electrostatic Precipitators.

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.

Re-Use of 'Activated Char Undersized' (ACU)

BSL advised that two re-use trials were completed prior to the previous IEA in 2019 and that recycling of ACU is still under investigation. BSL also advised that there have been no further trials since the previous IEA in 2019.

Whilst reuse at the Sinter Plant 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 upcycling up of some trace contaminant (e.g. Hg) is still being evaluated by BSL. Consequently, other options are also being considered such as using the ACU as a non-standard fuel source (e.g. charging ACU into the Blast Furnace via the PCI Plant).

Re-Use of material collected in the Electrostatic Precipitators

BSL is also investigating recycling of the electrostatic precipitator (EP) dust back to the Sinter Machine, which was part of the original design. BSL advised that the EP dust was removed from the process during initial operation of the WGCP as it was suspected of being a source of potential blockages in the adsorbers, but subsequently it has been determined that blockages were due to another cause. Blockage at the adsorbers is no longer an issue, but it is not straightforward to return EP dust to the Sinter Machine as it also raises the potential for 'upcycling'.

A stockpile of EP dust has been established in the BSL Alliance and Recycling area (refer to Photograph 20) and a draft management plan was submitted to the EPA for feedback on 30/11/2021. BSL has trialled return of EP dust and proposes further trials (as reported in minutes of EPA - Ore Preparation Meeting, dated November 2021, copy provided).

BSL advised that reuse of the EP dust is expected to occur before the next 3-yearly IEA.

4.3 Compliance Performance

4.3.1 Agency Notices, Orders, Penalty Notices or Prosecutions

The NSW EPA issued two penalty notices (Notice Numbers: 1597434 and 1597435, Issue date: 22 July 2020) for the PKSW since the previous IEA in 2019. These are reported in the 2019-2020 annual return as a non-compliance against condition E5.5 of the EPL.

The penalty notices related to six exceedances of the EPL concentration limit for dioxins and furans at LDP 151 during the WGCP bypass in March 2020 and April 2020.

4.3.2 Compliance Summary

The compliance status for each relevant requirement was assessed in accordance with the criteria from the NSW Government guidelines *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	4	39	0	15	35	0	**123**
Non-Compliant	0	1	0	0	4	0	0	4	0	**9**
Not Triggered	1	0	0	0	1	0	2	4	0	**8**
Total	**19**	**6**	**7**	**4**	**44**	**0**	**17**	**43**	**0**	**140**

Note: Equivalent consent conditions and/or EPL conditions are grouped (refer to Appendix B). The data reported in the table above is for the grouped conditions.

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 Appendix B. The equivalent number of Non-Compliances is five (5), as shown in Table 8.

Note: The recommended actions for 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/s #
NC 2022/01	It is not clear if all documents constituting the EMP for the WGCP 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). (Refer to CC # W-3.3).	2022/03
NC2022/02	Multiple consent conditions and EPL conditions have been assessed as 'Non-Compliant' due to exceedances of the EPL concentration limits for dioxins and furans at Point 151 (No. 3 Sinter Machine Stack) during the bypass in 2020. A recommendation has not been included as there have been no further exceedances of these concentration limits and actions have been implemented by BSL to prevent a reoccurrence (refer to Section 4.2.1). (Refer to CC #s W-4.13 & O-2.6, EPL # E5.4 & E5.5, EPL # E5.8).	-
NC2022/03	BSL should ensure compliance with the transport routes set out in the SEE or seek approval to use alternative routes. (Refer to CC # W-4.45, CC # W-4.46).	2022/05
NC2022/04	BSL advised that some contractors are not currently required to complete the 'Ore Prep Environment Awareness' training module. (Refer to CC # W-4.54).	2022/06
NC2022/05	BSL has self-reported (as a non-compliance in the 2019, 2020 and 2021 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. It is reported on the EPA website for EPL No. 6092 that the EPA has "requested additional information to progress BSL application to modify sampling methods". However, this non-compliance has continued to be reported in the past three annual returns and should be resolved for EPL Pt 2. (Refer to EPL # M2.1, M2.2 & M2.3, EPL # M3.1).	2022/09

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
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). Note: There is currently no standalone EMP. The required information may be included in various documents (Refer to CC # W3.2). 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.	BSL advised that it is proposed to change this condition to be the same as for OPUP (which does not require the EMP to be made publicly available); however, this change is currently on hold pending a final decision on the ACU modification.	**OPEN**	Refer to **2022/03**.

Prior Audit ID #	Action	Findings	Status	Recommended Action/s
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).	This is an open action from previous IEAs. BSL advised that it is proposed to address this action as part of a planned modification to the CCs.	**OPEN**	Refer to **2022/04**.
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.	BSL advised that 'road sweeper schedule' was reviewed to ensure this area is included on a weekly basis (email dated 21 January 2021, copy provided). Note: It was not possible to access this area during the site inspection on 24 February 2022 due to the presence of scaffolding for repairs to a conveyor.	**CLOSED**	
2019/4	BSL should ensure compliance with the transport routes set out in the SEE for: (i) all chemicals transported to the site (CC # W-4.45); and (ii) non-liquid waste from the site (CC # W-4.46). 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).	It was not possible within the scope of the current IEA to determine if all chemicals have been transported to the site in accordance with the routes specified in the SEE (CC # W-4.45) or that all non-liquid waste leaving the site have followed the route set out in Figure 5.4 of the SEE (CC # W-4.46). This action is still open.	**OPEN**	Refer to **2022/05**.
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.	New access arrangements have been provided since the previous IEA in 2019, which have eliminated parking along Christy Drive. The new access arrangements ensure use of dedicated vehicle parking areas for BSL personnel and visitors. Two additional car parks are also provided outside the Sinter Plant Administration Building.	**CLOSED**	

Prior Audit ID #	Action	Findings	Status	Recommended Action/s
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/).	The hyperlink to the 'FY2017 Annual Report' on the 'Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2017-nsw-monitoring-data/) opens an 'Annual Return' when it should open an 'Licence Monitoring Data Annual Summary Report.	**OPEN**	**2022/01 -** The hyperlink to the 'FY2017 Annual Report' on the 'Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2017-nsw-monitoring-data/) should be corrected so as to open the 'Licence Monitoring Data Annual Summary Report' for FY2017.
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).	EPL Pt 151 is now included in the *Ore Preparation LAWWNE Aspects Register* (refer to Section 4.1.2).	**CLOSED**	

4.4 Overall Findings

The overall findings of the IEA are 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 NSW EPA issued two penalty notices (Notice Numbers: 1597434 and 1597435, Issue date: 22 July 2020) for the PKSW since the previous IEA in 2019. The penalty notices related to six exceedances of the EPL concentration limit for dioxins and furans at LDP 151 during the WGCP bypass in March 2020 and April 2020. Investigations and actions have been implemented by BSL to prevent reoccurrence and no exceedances were recorded during a subsequent bypass in 2021.
- Despite the two penalty notices, 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 public complaints since the previous IEA in 2019 (refer to Section 4.2.1).
  - No non-compliances related to exceeding limits in the EPL since the previous IEA in 2019 (refer to Section 4.2.1), other than for the dioxins and furans during the WGCP bypass in2020 (as noted above).
  - Programs being undertaken by BSL to reduce potential future impacts (i.e. investigating the re-use of 'Activated Char Undersized' (ACU) and Electrostatic Precipitator (EP) dust – 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 being issued with two penalty notices since the previous IEA in 2019, 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.
- The overall number of non-compliances has reduced when compared to the previous IEA in 2019.

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)
2022/01	The hyperlink to the 'FY2017 Annual Report' on the 'Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2017-nsw-monitoring-data/) should be corrected so as to open the 'Licence Monitoring Data Annual Summary Report' for FY2017. (Refer to Section 4.3.5 - Prior Audit ID # 2019/6).	No
2022/02	The 'Procedure to Outline the Steps Necessary to Set up the Sinter Machine for WGCP By-pass' (SP-OPSP-07-32) should include the steps required to ensure the composition of the ore blend is modified to minimise dioxin formation prior to a planned bypass or in the event of an emergency bypass. (Refer to Appendix B.1 - CC # W-A1.2).	No
2022/03	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). Note: There is currently no standalone EMP. The required information may be included in various documents (Refer to CC # W3.2). 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. Note: This is an open action from previous IEAs. BSL advised that it is proposed to address this action as part of a planned modification to the CCs. (Refer to Appendix B.1 - CC # W-3.3 and Section 4.3.5 - Prior Audit ID # 2019/1).	Yes
2022/04	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 by amending the relevant conditions. Note: This is an open action from previous IEAs. BSL advised that it is proposed to address this action as part of a planned modification to the CCs. (Refer to Appendix B.1 - CC # W-4.11 and Section 4.3.5 - Prior Audit ID # 2019/2).	No

Action No.	Recommended Action	NC (Yes / No)
2022/05	It was not possible within the scope of the current IEA to determine if all chemicals have been transported to the site in accordance with the routes specified in the SEE (CC # W-4.45) or that all non-liquid waste leaving the site have followed the route set out in Figure 5.4 of the SEE (CC # W-4.46). It is understood that some materials are not being transported (e.g. Ammonia); however, BSL should undertake a review of current transport routes and seek an amendment to CC # W-4.45 and W-4.46 that will permit the assessment and use of alternative routes (particularly where these would pose a lower overall risk). (Refer to Appendix B.1 - CC # W-4.47 and Section 4.3.5 - Prior Audit ID # 2019/4).	Yes
2022/06	Contractors should also complete the 'Ore Prep Environment Awareness' training module and evidence of completion of environmental awareness training should be included in the ComplyFlow tracking system. (Refer to Appendix B.1 - CC # W-4.54)	Yes
2022/07	BSL should establish a procedure or process to ensure stack testing at Discharge Point 107 is undertaken in accordance with EPL # O4.19 if an SRG Plant or regenerator outage exceeding 21 days (e.g. by adding a corrective action to undertake additional monitoring with a corresponding due date). (Refer to Appendix B.2 – EPL # O4.19).	No
2022/08	Only two of the quarterly monitoring results for Solid Particles at EPL Point 2 are reported on the 'Monitoring Data' page of the BSL website in 2019. The missing records should be uploaded to the website. (Refer to Appendix B.2 – EPL # M2.1, M2.2 & M2.3).	No
2022/09	BSL has self-reported (as a non-compliance in the 2019, 2020 and 2021 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. It is reported on the EPA website for EPL No. 6092 that the EPA has "requested additional information to progress BSL application to modify sampling methods". However, this non-compliance has continued to be reported in the past three annual returns and should be resolved for EPL Pt 2. (Refer to Appendix B.2 – EPL # M2.1, M2.2, M2.3 &M3.1).	Yes
2022/10	It is recommended that BSL consult with the EPA to determine if EPL condition #M8.3 is still applicable for Point 89 now that the IMED is unlikely to overflow under normal conditions and monitoring at Point 89 is normally only required 'daily during a dry weather discharge' (refer to EPL # M2.5 & M2.6). If EPL condition #M8.3 is retained, then sampling requirements should be clearly defined (e.g. sampling at Point 89 is required during dry and/or wet weather discharges to determine these mass loads). (Refer to Appendix B.2 – EPL # M8.3).	No
2022/11	EPL Condition # R4.1 part b) includes a cross-reference to 'O4.17 - SRG Venting'. This appears to be an error and should be a reference to EPL Condition # O4.16 (Note: it appears that this cross-reference was not corrected when a condition was deleted for an update to the EPL on 12 January 2017). (Refer to Appendix B.2 – EPL # R4.1).	No

Action No.	Recommended Action	NC (Yes / No)
2022/12	BSL would appear to be compliant with the intent of EPL Condition # R4.1 based on submission of the Annual Returns (refer to CC # W-A3.1) and the quarterly monitoring reports (i.e. reports for Jan, Apr, Jul and Oct) on the 'Monitoring Data' page of the BSL website; however, the monitoring data for particulate matter at Point 107 should be included in the 'Annual Monitoring Report' as required under part b). (Refer to Appendix B.2 – EPL # R4.1).	No
2022/13	Significant build up and drag out of dust was observed outside the northern end of the Sinter Plant (refer to Photograph 9). This area should be cleaned to minimise drag out and potential discharge of these dusts to the site drainage system. (Refer to Appendix B.3 – ID # 1).	No
2022/14	Small amounts of loose char were observed on the ground at the WGCP (refer to Photograph 12 and Photograph 14). These char spillages should be cleaned up. (Refer to Appendix B.3 – ID # 2).	No
2022/15	The bund for the Sodium Hydroxide unloading area should be cleaned of all sediments and debris (refer to Photograph 13). (Refer to Appendix B.3 – ID # 3).	No
2022/16	It should be ensured that the bin marked for 'dry industrial waste' at the WGCP is not used for other waste materials (refer to Photograph 17). (Refer to Appendix B.3 – ID # 1).	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) or no longer applicable.

6 REFERENCES

1 Arriscar Pty Ltd, 10 January 2022, *Waste Gas Cleaning Plant, Hazard Audit (2022), Rev.2*.

2 NSW Environment Protection Authority, January 2022, *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, Industry and Environment, May 2020, *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 or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
CONSENT CONDITIONS					
A. GENERAL / ADMINISTRATIVE CONDITIONS					
A.1 Obligation to Minimise Harm to the Environment / Undertake Activities in a Competent Manner					
W-1.1	Environment Protection Licence	6092	-	11-Nov-2021	Yes (E)
W-1.1	Ore Preparation LAWWNE Aspects Register	DS.DH-IM-ADM-05.03	6	Feb-2022	Yes (E)
W-1.1	MARS				No
W-1.1	Risk Scenario – Waste Gas – Stack Discharge	Hazard 2.3.3		17-Feb-2022	Yes (E)
W-4.1	EPA - Ore Preparations Meeting Minutes			9-Feb-2021	Yes (E)
W-4.1	EPA - Ore Preparations Meeting Minutes			30-Nov-2021	Yes (E)
W-A1.1	Ore Preparations – SP & RM & Bulk Operations Monthly Compliance Report			Nov-2021	Yes (E)
W-A1.1	Ore Preparations – Asset Maintenance/Development Monthly Compliance Report			Feb-2022	Yes (E)
W-A1.1	Example 'Ore Preparation Training Matrix' (Excel spreadsheet) for Crew B			15-Feb-2022	Yes (E)
W-A1.1	SCE Monthly Environmental Compliance Report			Jan-2022	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-2019	Yes (E) *
W-2.5 & O-1.3	BlueScope Steel (AIS) Pty Ltd - Sinter Plant Waste Gas Cleaning Plant, Gypsum Plant and Ore Preparation Upgrade Project (Triennial) Environmental Management Report for 1-Jul-2017 to 30-Jun-2020			23-Oct-2020	Yes (E)
W-2.5 & O-1.3	Sinter Plant Ore Preparations Upgrade Project (MP 06_0229) – Triennial Environmental Management Report 1 July 2017 to 30 June 2021 (Letter from DPIE to BSL)			17-Nov-2020	Yes (E)

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
W-2.5 & O-1.3	Waste Gas Cleaning Plant (DA-26-02-01) – Triennial Environmental Management Report 1 July 2017 to 30 June 2021 (Letter from DPIE to BSL)			17-Nov-2020	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-2007	Yes (E)
O-1.5	BlueScope Steel (AIS) Pty Ltd - Sinter Plant Waste Gas Cleaning Plant, Gypsum Plant and Ore Preparation Upgrade Project (Triennial) Environmental Management Report for 1-Jul-2017 to 30-Jun-2020			23-Oct-2020	Yes (E)
O-1.5	Sinter Plant Monthly Report			Jul 2020 to Jul 2021	Yes (E)
A.4 Environment Protection Licence / Statutory Requirements					
W-1.3, W-1.4, W-A4.1 & O-1.6	Environment Protection Licence	6092		11-Nov-2021	Yes (E)
A.5 Structural Adequacy					
W-1.5	Construction Certificate for piling and foundations for the main plant	Certificate No. 125/01		10-Sep-2001	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-2001	Yes (E) *
W-1.5	Construction Certificate for construction of the main plant	Certificate No. 65/02		21-Mar-2002	Yes (E) *
W-1.5	Construction Certificate for construction of the WGCP stack	Certificate No. 288/02		6-Nov-2002	Yes (E) *
W-1.5	Construction Certificate for construction of ancillary plant (SRG and ammonia)	Certificate No. 289/02		6-Nov-2002	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-2003	Yes (E) *
W-1.5	Construction Certificate for piling and civil works for the gypsum plant	Certificate No. 65/06		20-Feb-2006	Yes (E) *
W-1.6	Interim Occupation Certificate for the WGCP	Certificate No. 66/03		6-May-2003	Yes (E) *

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
W-1.6	Final Occupation Certificate for the WGCP	Certificate No. 18/05		19-Jan-2005	Yes (E) *
W-1.7	Appointment of Principal Certifying Authority (Letter from BHP to Department of Urban Affairs and Planning)			23-Jul-2001	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-2001	Yes (E) *
W-1.7	Letter from BHP Steel to Council and Department with attached Pre-Construction Compliance Report			11-Sep-2001	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-2002	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-2002	Yes (E) *
A.6 Statutory Requirements					
W-1.10	Documentum				
W-1.10	Environment Protection Licence	6092		11-Nov-2021	Yes (E)
A.7 Maintenance and Operation of Plant and Equipment					
W-A1.2	CITECT				
W-A1.2	Example Work Order for Outlet Dust Monitor Cleaning	WO30721957		Nov-2021	Yes (E)
W-A1.2	Maintenance Plan in SAP to Remove and Clean Outlet Dust Monitor (example screenshot)	SP1296			Yes (E)
W-A1.2	Procedure for the Investigation of High Dust Emission Levels While the WGCP is Bypassed	SP-OPSP-07-31	3	10-Mar-2020	Yes (E)
W-A1.2	Procedure to Outline the Steps Necessary to Set up the Sinter Machine for WGCP By-pass	SP-OPSP-07-32	2	19-Feb-2020	Yes (E)
W-A1.2	Sinter Plant Bedly Report				No
W-A1.2	Trip Machine on High Waste Gas TPM	Event 4296274		9-Mar-2020	Yes (E)

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
B. ENVIRONMENTAL MANAGEMENT PLANS					
B.1 Construction Management Plan					
O-6.1 & O-6.2	Independent Environmental Audit Report, Sinter Ore Preparation Upgrade Project		Final	Jul-2013	Yes (E) *
B.2 Environmental Management Plan					
W-3.2 & G-3.4	Coke and Iron Department Handbook	DH-CI-ADM-00	8	Feb-2020	Yes (E)
W-3.2 & G-3.4	Example 'Cokemaking & Ironmaking Env. Business Plan Report' for July 2021 to February 2022				Yes (E)
W-3.2 & G-3.4	Example 'Cokemaking & Ironmaking Monthly Environment Report' from MARS for January 2022				Yes (E)
W-3.2 & G-3.4	Example 'Individual Performance and Development Review' for: Ore Preparation Operations Engineer				Yes (E)
W-3.2 & G-3.4	Independent Environmental Audit (2016), Audit Report	J-000185-REP-002	0	15-Jun-2016	Yes (E)
W-3.2 & G-3.4	NSW Pollution Incident Response Plan			Jun-2021	Yes (E)
W-3.2 & G-3.4	Ore Preparation LAWWNE Aspects Register	DS.DH-IM-ADM-05.03	6	Feb-2022	Yes (E)
W-3.2 & G-3.4	Ore Preparation Operations - Organisation Chart (example screenshots)				Yes (E)
W-3.2 & G-3.4	Procedure for Responding to High Dust Emission Levels from the WGCP Stack	SP-OPSP-K-WGH-01	4	1-Apr-2019	Yes (E)
W-3.2 & G-3.4	Process User Requirement Specification (PURS), Part 6.0, Dust Management System	MA-OPSP-K-PURS-06	3	14-Jul-2017	Yes (E)
W-3.2 & G-3.4	Risk Scenario – Waste Gas – Stack Discharge	Hazard 2.3.3		17-Feb-2022	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-2010	Yes (E) *
O-6.3	Independent Environmental Audit Report, Sinter Ore Preparation Upgrade Project		Final	Jul-2013	Yes (E) *

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
C. COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT / COMPLAINTS					
C.1 Provision of Information					
O-5.1 & O-5.4	Minutes for Community Consultative Committee Meetings				Yes (E)
O-5.1 & O-5.4	'Sinter Plant Ore Preparation Upgrade' page of BSL website				Yes (E)
C.2 Systems for Receiving Complaints and Enquiries					
W-4.55, W-A2.2 & O-5.2	Example Self-Report to EPA (Entry in MARS database)	ID C2021202	-		No
W-4.55, W-A2.2 & O-5.2	MARS				
W-4.55, W-A2.2 & O-5.2	Significant Environmental Incident Investigation and Reporting Process	MA-ENV-11-01	3	Aug-2018	Yes (E)
C.3 Recording of Complaints and Follow-up Actions					
W-A2.1 & O-5.3	Example Self-Report to EPA (Entry in MARS database)	ID C2021202	-		No
W-A2.1 & O-5.3	MARS				
W-A2.1 & O-5.3	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Apr-2019 to 21-Feb-2022				Yes (E)
D. COMPLIANCE MONITORING AND REPORTING					
W-2.1	Environment Protection Licence	6092		11-Nov-2021	Yes (E)
W-2.1	Ore Preparations – SP & RM & Bulk Operations Monthly Compliance Report			Nov-2021	Yes (E)
W-2.1	Ore Preparations – Asset Maintenance/Development Monthly Compliance Report			Feb-2022	Yes (E)
W-2.2	SCE Monthly Environmental Compliance Report			Jan-2022	Yes (E)
E. ENVIRONMENTAL STANDARDS AND CONDITIONS					
E.3 Noise – Operations Phase					
W-4.2 & W-4.6	Sinter Plant Compliance Noise Monitoring	610.18002-L01-v1.0		7-Feb-2019	Yes (E) *

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
W-4.6, W-4.7 & O-2.9	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Apr-2019 to 21-Feb-2022				Yes (E)
W-4.6, O-2.9 & O-2.10	Environment Protection Licence	6092		11-Nov-2021	Yes (E)
O-2.9	Independent Environmental Audit Report, Sinter Ore Preparation Upgrade Project		Final	Jul-2013	Yes (E) *
O-2.10	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Apr-2019 to 21-Feb-2022				Yes (E)
E.5 Air Quality – Operations Phase					
O-2.1	Environment Protection Licence	6092		11-Nov-2021	Yes (E)
O-2.1	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Apr-2019 to 21-Feb-2022				Yes (E)
W-4.11	EHS Data Monitor Pro web-based application – Data recorded for c. January 2018 to December 2021 for EPL Pt 107				Yes (E)
W-4.11	'NSW Monitoring Data' page of the BSL website				
W-4.12 & O-2.2	Fugitive Dust Management System	MA-ENV-02-02	4	Oct-2019	Yes (E)
W-4.12	MARS record for spill of powdered lime during unloading of a truck	i2032803		9-Dec-2021	Yes (E)
O-2.3	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Apr-2019 to 21-Feb-2022				Yes (E)
O-2.3 & O-2.4	Fugitive Dust Management System	MA-ENV-02-02	4	Oct-2019	Yes (E)
O-2.4	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Apr-2019 to 21-Feb-2022				Yes (E)
W-4.14	EHS Data Monitor Pro web-based application – Data recorded for c. January 2018 to December 2021 for dioxins at EPL Pt 107				Yes (E)

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
E.6 Sulphur Rich Gas Management					
W-4.20	Gypsum: Use as a Soil Amendment (PowerPoint presentation)				Yes (E)
W-4.20	Query re suitability of gypsum product (email from DPI to BSL)			29-Oct-2021	Yes (E)
W-4.20	Gypsum proposal (email from EPA to BSL)			18-Nov-2021	Yes (E)
G-4.21A	Example summary report (Excel spreadsheet) submitted to the EPA, which includes the status of the regenerator and SRG plant			Nov-2021	Yes (E)
G-4.21A	Gypsum Tonnes Transported Since 2019 (Excel spreadsheet)				Yes (E)
E.9 Pollution of Waters					
W-4.30	2021 PKSW Groundwater monitoring map extract				Yes (E)
W-4.30 & W-4.31	Environment Protection Licence	6092		11-Nov-21	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-2013	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-4.37	Environment Protection Licence	6092		11-Nov-21	Yes (E)
W-4.37	EPL licence Notice No. 1110309	280032		19-Mar-2010	Yes (E)
W-4.38	Fugitive Dust Management System	MA-ENV-02-02	4	Oct-2019	Yes (E)
W-4.38	WGCP Regen Fans - Clean Heat Exchanger – Chemical Clean			3-Aug-2021	Yes (E)

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
W-4.39 & W-4.40	Independent Environmental Audit (2016), Audit Report	J-000185-REP-002	0	15-Jun-16	Yes (E)
W-4.39 & W-4.41	Management of Waste Material	DIV-AR-RS-01	14	Apr-2020	Yes (E)
W-4.39	Ore Prep Waste Management Plan (Excel spreadsheet)	MA-OPD-01-03-05			Yes (E)
W-4.39 & W-4.41	Waste Register for Coke and Ironmaking Department (example screenshot)				Yes (E)
W-4.42	EPA - Ore Preparations Meeting Minutes			30-Nov-2021	Yes (E)
W-4.42	Management of Waste Material	DIV-AR-RS-01	14	Apr-2020	Yes (E)
O-2.13	Environment Protection Licence	6092		11-Nov-21	Yes (E)
O-2.13	Independent Environmental Audit Report – Sinter Plant – Waste Gas Cleaning Plant and Gypsum Plant			2013	Yes (E) *
O-2.15	Management of Waste Material	DIV-AR-RS-01	14	Apr-2020	Yes (E)
O-2.15	Waste Register for Coke and Ironmaking Department (example screenshot)				Yes (E)
E.16 Roads and Traffic					
W-4.45	BlueScope Steel (AIS) Pty Ltd - Sinter Plant Waste Gas Cleaning Plant, Gypsum Plant and Ore Preparation Upgrade Project (Triennial) Environmental Management Report for 1-Jul-2017 to 30-Jun-2020			23-Oct-2020	Yes (E)
W-4.45	Independent Environmental Audit (2016), Audit Report	J-000185-REP-002	0	15-Jun-16	Yes (E)
W-4.45 & W-4.46	SMERP Transport of Hazardous Materials Study			2002	Yes (E) *
W-4.48	Independent Environmental Audit Report – Sinter Plant – Waste Gas Cleaning Plant and Gypsum Plant			2013	Yes (E) *
W-4.48	Transport Management Plan			21-Dec-2020	Yes (E)
E.17 Site Management					
W-4.51	Independent Environmental Audit Report – Sinter Plant – Waste Gas Cleaning Plant and Gypsum Plant			2013	Yes (E) *
W-4.51	WGCP Regen Fans - Clean Heat Exchanger – Chemical Clean			3-Aug-2021	Yes (E)

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
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-Apr-2019 to 21-Feb-2022				Yes (E)
E.19 Environmental Awareness Training					
W-4.54	Example 'Ore Preparation Training Matrix' (Excel spreadsheet) for Crew B			15-Feb-2022	Yes (E)
W-4.54	Illawarra Site Environment Awareness Refresher Training	52002852		7-Oct-2020	Yes (E)
W-4.54	Ore Preparation Departmental Induction and Conveyor Safety (In part only)	52002065			Yes (HC) *
W-4.54	Ore Preparation Bulk Operations Environment Awareness Refresher Training		1		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			2018–2019	Yes (E)
W-A3.1, W-A3.3, W-A3.4 & WA3.6	eConnect EPA: Annual Return submitted (email)			29-Aug-2019	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			2019-2020	Yes (E)
W-A3.1, W-A3.3, W-A3.4 & WA3.6	eConnect EPA: Annual Return submitted (email)			29-Aug-2020	Yes (E)

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
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			2020-2021	Yes (E)
W-A3.1, W-A3.3, W-A3.4 & WA3.6	eConnect EPA: Annual Return submitted (email)			29-Aug-2021	Yes (E)
G.3 Environmental Management Report					
W-7.4, W-7.5, O-7.2 & O-7.3	BlueScope Steel (AIS) Pty Ltd - Sinter Plant Waste Gas Cleaning Plant, Gypsum Plant and Ore Preparation Upgrade Project (Triennial) Environmental Management Report for 1-Jul-2017 to 30-Jun-2020			23-Oct-2020	Yes (E)
O-7.2 & O-7.3	Sinter Plant Ore Preparations Upgrade Project (MP 06_0229) – Triennial Environmental Management Report 1 July 2017 to 30 June 2021 (Letter from DPIE to BSL)			17-Nov-2020	Yes (E)
W-7.4 & W-7.5	Waste Gas Cleaning Plant (DA-26-02-01) – Triennial Environmental Management Report 1 July 2017 to 30 June 2021 (Letter from DPIE to BSL)			17-Nov-2020	Yes (E)
G.4 Independent Environmental Audit					
W-7.6, W-7.7, O-4.1 & O-4.2	Independent Environmental Audit (2019), Audit Report	J-000364-REP-001	0	23-Apr-2019	Yes (E)
W-7.6, W-7.7, O-4.1 & O-4.2	Waste Gas Cleaning Plant (DA No 26-02-01) Sinter Plant Ore Preparations Upgrade Project (MP 06_0229) Independent Environmental Audit 2019 (Letter from DP&E to BSL)			9-May-2019	Yes (E)
G.5 Incident Reporting					
O-7.1, W-A3.7 & W-A3.8	Environment Protection Licence	6092		11-Nov-21	Yes (E)
O-7.1, W-A3.7 & W-A3.8	Penalty Notices – Two Non-compliances with Environment Protection Licence Condition E5.5 – Dioxins and Furans Exceedances During March and April 2020			22-Jul-2022	Yes (E)

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
W-A3.8	Sinter Machine Stack Dioxins & Furans Exceedances (BSL Incident Report)			8-May-2020	Yes (E)
O-7.1	MARS record for exceedances of EPL concentration limits for dioxins and furans at Pt 151 during the bypass in 2020	i1718603		20-Apr-2020	Yes (E)
O-7.1	Significant Environmental Incident Investigation and Reporting Process	MA-ENV-11-01	3	Aug-2018	Yes (E)
ENVIRONMENT PROTECTION LICENCE CONDITIONS					
LIMIT CONDITIONS					
L2 Load Limits					
L2.4	Licence Monitoring Data, Annual Summary Report, 1 Jul 2018 to 30 Jun 2019 (Data for Sinter Plant WGCP)				Yes (E)
L2.4	Licence Monitoring Data, Annual Summary Report, 1 Jul 2019 to 30 Jun 2020 (Data for Sinter Plant WGCP)				Yes (E)
L2.4	Licence Monitoring Data, Annual Summary Report, 1 Jul 2020 to 30 Jun 2021 (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 c. January 2018 to December 2021 for EPL Pt 107				Yes (E)
L3.4 & L3.5	'NSW Monitoring Data' page of the BSL website				
L6 Noise Limits					
L6.2	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Apr-2019 to 21-Feb-2022				Yes (E)
OPERATING CONDITIONS					
O3 Dust					
O3.2	Environment Protection Licence	6092		11-Nov-2021	Yes (E)
O3.2	Fugitive Dust Management System	MA-ENV-02-02	4	Oct-2019	Yes (E)
O3.2	MARS record for DER size 3 from vac truck emptying in 21 area	i1899993		14-Apr-2021	Yes (E)

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
O3.2	Port Kembla Wind Forecast: 12 February (email)			12-Feb-2022	Yes (E)
O3.2	Port Kembla Wind Forecast: 20 February (email)			20-Feb-2022	Yes (E)
O3.5	Fugitive Dust Management System	MA-ENV-02-02	4	Oct-2019	Yes (E)
O4 Processes and management					
O4.17	Example summary report (Excel spreadsheet) submitted to the EPA, which includes the status of the regenerator and SRG plant			Nov-2021	Yes (E)
O4.17	Gypsum Tonnes Transported Since 2019 (Excel spreadsheet)				Yes (E)
O4.18	Register of self-reports to EPA (Extract from MARS system in Excel format) for 1-Apr-2019 to 21-Feb-2022				Yes (E)
MONITORING AND RECORDING CONDITIONS					
M1 Monitoring records					
M1.2 & M1.3	EHS Data Monitor Pro web-based application – Data recorded for c. January 2018 to December 2021 for EPL Pt 107				Yes (E)
M1.2	'NSW Monitoring Data' page of the BSL website				
M1.3	'LIMS Solutions' database				
M2 Requirement to monitor concentration of pollutants discharged					
M2.1, M2.2 & M2.3	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2018–2019	Yes (E)
M2.1, M2.2 & M2.3	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2019–2020	Yes (E)
M2.1, M2.2 & M2.3	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2020–2021	Yes (E)
M2.1, M2.2 & M2.3	EHS Data Monitor Pro web-based application – Data recorded for c. January 2018 to December 2021 for EPL Pt 107				Yes (E)

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
M2.1, M2.2, M2.3, M2.5 & M2.6	'NSW Monitoring Data' page of the BSL website				
M3 Testing methods - concentration limits					
M3.1 & M3.2	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2018–2019	Yes (E)
M3.1 & M3.2	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2019–2020	Yes (E)
M3.1 & M3.2	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2020–2021	Yes (E)
M3.1	Approval to use USEPA Conditional Test Method CTM-13B (Letter from EPA to BSL)			17-Nov-2015	Yes (E) *
M8 Requirement to monitor volume or mass					
M8.1	'Manly Hydraulics Laboratory' online system				
M8.2 & M8.3	'NSW Monitoring Data' page of the BSL website				
M9 Other monitoring and recording conditions					
M9.1	CITECT				
M9.1	EPA - Ore Preparations Meeting Minutes			9-Feb-2021	Yes (E)
M9.1	Ore Preparations – SP & RM & Bulk Operations Monthly Compliance Report			Nov-2021	Yes (E)
M9.1	Ore Preparations – Asset Maintenance/Development Monthly Compliance Report			Feb-2022	Yes (E)
M9.1	Point 2 Opacity Hourly Avg 2018-2022 (Excel spreadsheet)				Yes (E)
M9.2	ControlWare system for camera displays				
REPORTING CONDITIONS					
R4 Other reporting conditions					
R4.1	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2018–2019	Yes (E)
R4.1	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2019–2020	Yes (E)
R4.1	Annual Return, BLUESCOPE STEEL (AIS) PTY. LTD., Licence 6092			2020–2021	Yes (E)

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
R4.1	'NSW Monitoring Data' page of the BSL website				
R4.2, R4.3 & R4.4	BlueScope Port Kembla Steelworks Ambient Monitoring Data Portal				
R4.2	EPA and BSL Environment Department Liaison Meeting Minutes			9-Jun-2016	Yes (E) *
R4.2	Revamped ambient monitoring data site (Email from BSL to EPA)			20-Feb-2018	Yes (E) *
R4.3 & R4.4	Ambient Air Monitoring Network Peer Review	0480622	1	23-Nov-2018	Yes (E) *
R4.5	Register of recorded complaints (Extract from MARS system in Excel format) for 1-Apr-2019 to 21-Feb-2022				Yes (E)
SPECIAL CONDITIONS					
E5 Sinter Machine Short Term Bypass Arrangements					
E5.3, E5.7, E5.8 & E5.10	Request to Bypass the Sinter Plant Waste Gas Cleaning Plant (Letter from BSL to EPA)			27-Sep-2021	Yes (E)
E5.3, E5.7, E5.8 & E5.10	Request to Bypass the Sinter Plant Waste Gas Cleaning Plant (Letter from BSL to EPA)			14-May-2021	Yes (E)
E5.3, E5.7, E5.8 & E5.10	Special Condition 'E5 Sinter Machine Short Term Bypass Arrangements – February 2020 (Letter from EPA to BSL)			6-Dec-2019	Yes (E)
E5.3, E5.7, E5.8 & E5.10	Approval of Request to Bypass the Sinter Plant Waste Gas Cleaning Plant – June 2021			3-Jun-2021	Yes (E)
E5.4 & E5.5	EHS Data Monitor Pro web-based application				
E5.4 & E5.5	'LIMS Solutions' database				
E5.4, E5.5, E5.6 & E5.9	'NSW Monitoring Data' page of the BSL website				
E5.11	Review of Air Emissions Model (Report)			26-Feb-2021	No
E5.11	Review of Air Emissions Model Update (letter from BSL to EPA)			30-Dec-2021	Yes (E)
E5.12 & E5.13	Methodology for Feasibility Assessment for Continuous Emissions Monitoring Systems (Sulfur Dioxide)			28-Oct-2021	Yes (E)

ID #	Document or Electronic System	Document No.	Rev. No.	Date	Copy Taken?
E5.12 & E5.13	Condition E5.12 Proposed Methodology for Feasibility Assessment (letter from EPA to BSL)			2-Nov-2021	Yes (E)
E7 Sinter Plant Waste Reuse Trials					
E7.2	Approval of Activated Char Undersized Reuse Trial (letter from EPA to BSL)			15-Jul-2016	Yes (E) *
E7.2	Erratum: Approval of Activated Char Undersized (ACU) Reuse Trial (letter from EPA to BSL)			19-Jul-2016	Yes (E) *
E7.2	Approval of Activated Char Undersized Reuse Trial 2 (letter from EPA to BSL)			31-Jan-2018	Yes (E) *
E7.3	Trial 1 Report Reuse of Activated Char Undersized in the Sinter Plant (letter from EPA to BSL)			8-Nov-2017	Yes (E) *
E7.3, E7.4, E7.6 & E7.7	Reuse of Activated Char Undersize (ACU) in the Sinter Plant, Trial 1 Report			Jul-2017	Yes (E) *
E7.3, E7.4, E7.6 & E7.7	Reuse of Activated Char Undersize (ACU) in the Sinter Plant, Trial 2 Report			Dec-2018	Yes (E) *
ACTIONS FROM PREVIOUS IEAs					
2019/3	Road sweeper schedule			21-Jan-2021	Yes (E)
2019/6	'NSW Monitoring Data' page of the BSL website				
2019/7	Ore Preparation LAWWNE Aspects Register	DS.DH-IM-ADM-05.03	6	Feb-2022	Yes (E)

* Documentation provided for a previous IEA.

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 (24 February 2022) 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.	Controls are listed in the Environmental Aspects and Impacts Register (DS.DH-IM-ADM-05.03, Rev. 6, dated February 2022, copy provided). This information is also included in the on-line hazard register (MARS), which was sighted (example record for WGCP stack discharge, 2.3.3) 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. 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. A relatively large number of Pollution Reduction Programs are listed in the EPL (such as PRP 176 for the IMED diversion project). Whilst there are currently no PRPs relating to the WGCP, this PRP history indicates an ongoing program of implementing additional risk reduction measures at the Steelworks.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		Some controls listed in the Environmental Aspects and Impacts Register were spot-checked during the site inspections (refer to Appendix B.3).		
W-4.1	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.	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 Appendix B of this report). Meeting this overall objective is also evidenced through: • Relatively few incidents and no complaints associated with the WGCP since the previous IEA (refer to Section 4.2.1); • Relatively few identified non-compliances in this IEA (refer to Sections 4.3.2 and 4.3.3); • Active communication with the EPA (Example minutes sighted for 9 February 2021 and 30 November 2021, copies provided); and • Active communication via the Community Consultation Committee (Minutes are available at: http://bsi-illawarraweb-prod.elasticbeanstalk.com/community/community-consultative-committee/). This CC specifically relates to operation of the WGCP and there have been no exceedances of the licence limits from the WGCP stack (Pt 107 – refer to EPL # L3.4) during operation of the WGCP. The dioxin exceedances in 2020 occurred during a bypass of the WGCP (refer to Section 4.2.1) when the WGCP was not in operation.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		This CC has been categorised as 'Compliant' and non-compliances related to the dioxin exceedances are addressed separately (refer to CC # O2.6 and EPL # E5.5 and E5.8).		
W-A1.1 [Also EPL # O1.1]	Licensed activities must be carried out in a competent manner. This includes: • the processing, handling, movement and storage of materials and substances used to carry out the activity; and • the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	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 Appendix B of this report). The systems used to ensure competency of plant operation and contractors were also reviewed during the IEA. **Plant Operations** 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 November 2021 and February 2022. These specifically include a reference to the general EPL condition and list examples of the actions / evidence required to demonstrate compliance. An example 'Ore Preparation Training Matrix' (Excel spreadsheet, dated 15-Feb-2022) was provided for Crew B. Training with an environmental focus is listed in this training matrix and appeared to be comprehensive. For example: • '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', etc.). • 'Ore Prep Environment Awareness'. **Contractors** An example monthly compliance report was provided for SCE Industrial Services (Jan-22), which lists examples of actions / evidence required to demonstrate compliance with EPL licence requirements.	**Compliant**	

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 (Super-cedes W-1.2)	The Applicant must carry out the development generally in accordance with: (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. In the event of an inconsistency between: (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 recent document shall prevail to the extent of the inconsistency.	It is difficult to verify compliance with all aspects of this CC, therefore a sampling approach was adopted as follows: (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. Surveys are undertaken every 5 years, so the 7-Feb-19 report (which was provided during the previous IEA in 2019) is still current. Note: The memorial has been relocated; however, the noise monitoring was undertaken at the original location in accordance with EPL # L6.5. 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.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
O-1.1 & O-1.2	The Proponent shall carry out the project generally in accordance with the: (a) Major Project Application 06_0229; (b) *Ore Preparation Upgrade Project - Environmental Assessment* dated February 2007, and prepared by CH2M HILL Australia Pty Ltd; (c) Correspondence titled *BlueScope Steel's Proposed Ore Preparation Plant Upgrade - Reference: 06-0229* dated 2 May 2007 and containing *Attachment 1: Response to Issues Raised in Submissions and Additional Statement of Commitments*; and (d) MOD 1. In the event of an inconsistency between: (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.	It is difficult to verify compliance with all aspects of this CC, therefore a sampling approach was adopted as follows: (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. 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.	**Compliant**	
W-2.5 & O-1.3	The Proponent shall comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of: (a) any reports, plans or correspondence that are submitted in accordance with this approval; and (b) the implementation of any actions or measures contained in these reports, plans or correspondence.	BSL advised that the DPIE has not requested specific additional requirements. For example: • BSL advised that no specific requests had been received from DPIE relating to the IEA undertaken in 2019. • BSL advised that no specific requests had been received from DPIE relating to the Hazard Audit for the WGCP undertaken in 2021 (Note: Hazard Audit related requirements were excluded from the scope of the IEA – refer to Section 1.4).	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		• The letter from the DPIE in response to BSL's submission of the 2017-2020 'Triennial Environmental Management Report' for the WGCP does not include any specific additional requirements (letter dated 17/11/2020, copy provided). • The letter from the DPIE in response to BSL's submission of the 2017-2020 'Triennial Environmental Management Report' for the OPUP only required the following: "in accordance with Schedule 2, Condition 5.4 please make the copy of the Triennial Report available on the company website, including any other documents as required under Condition 5.4 and also ensure that these documents are up-to-date." (letter dated 17/11/2020, copy provided). The most recent 'Triennial Environmental Management Report' (EMR) for 1-Jul-2017 to 30-Jun-2020 is available on the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/). This observation is consistent with the consultation with the DPIE prior to audit (refer to Section 2.3.1).		
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**	
O-1.5	The maximum production capacity from the upgraded Sinter Plant shall be limited to 6.6 million tonnes per annum.	The daily production data is recorded. The average daily production data for July 2020 to June 2021 showed production of 10,103 tonnes per day, which equates to c. 3.67 million tonnes per annum.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		Previous year's annual production data is reported in the Triennial Review reports, which are available on line at: https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/ 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) and re-starting of blast furnace 6 is not expected to occur before the next IEA.		
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.	BSL has a current EPL licence (EPL 6092, dated 11-Nov-21, copy provided). A historical listing of the EPL revisions issued to BSL is included on the EPA website (sighted). BSL advised that there have been no new construction activities since the previous IEA in 2019, which appeared to be consistent with observations during the site inspection on 24 February 2022.	**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.	BSL has a current EPL licence (EPL 6092, dated 11-Nov-21, copy provided). No issues were raised by the EPA representative prior to the IEA (refer to Section 2.3.1).	**Compliant**	
W-A4.1 [Also EPL # G1.1 to G1.3]	Copy of licence kept at the premises or on the vehicle or mobile plant. A copy of this licence must be kept at the premises or on the vehicle or mobile plant to which the licence applies. The licence must be produced to any authorised officer of the EPA who asks to see it.	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. A copy of the EPL is held by the BSL environment department (not sighted) and is available on the BSL intranet (sighted).	**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.	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.		
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.	BSL has a current EPL licence (EPL 6092, dated 11-Nov-21, copy provided), which is available on the EPA website. Since the previous IEA in 2019 there have been multiple variations to the EPL, including the addition of conditions related to the dioxin exceedances during the WGCP bypass in 2020 (refer to Section 4.2.1 and Appendix B.2). A copy of the approval is stored in Documentum (sighted). Also refer to CC # W-A4.1 above.	**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.	Construction certificates for the WGCP (DA 26-02-01) were provided during the previous IEA in 2019. These include: • 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].	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		• 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]. The WGCP was constructed in 2003 (Certificates 1-6) and the Gypsum Plant was commissioned in 2007 (Certificate 7).		
W-1.6	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.	The interim and final occupation certificates for the WGCP (DA 26-02-01) were provided during the previous IEA in 2019 (Certificate No. 66/03, dated 6-May-03 and Certificate No. 18/05, dated 19-Jan-05).	**Compliant**	
W-1.7	Prior to commencement of work, the person having the benefit of the Development Consent and a Construction Certificate shall: • 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). The Principal Certifying Authority shall determine when inspections and compliance certificates are required.	The letter sent to the Department appointing the Principal Certifying Authority was provided during the previous IEA in 2019 (letter dated 23-Jul-01, copy provided). 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 during the previous IEA in 2019 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).	**Compliant**	
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.	An engineering certification from Sumitomo Heavy Industries was provided for the previous IEA in 2019 (dated 15-Feb-02). It is reported in this document that:	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		All design loads for the structural design was determined in accordance with the following standards. *AS 1170.1 Dead and live loads* *AS 1170.2 wind loads* *AS 1170.4 Earthquake loads* The design of the foundations was certified against AS 1170 by Woolacotts Consulting Engineers (letter dated 19-Sep-02, copy provided for previous IEA in 2019). 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.)".		
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 24 February 2022. BSL advised that there may be some demolition at the berth in future that might be close to the Gypsum Plant. This is expected to be covered by the separate DA for berth upgrade (i.e. out of scope of current IEA).	**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	BSL has a current EPL licence (EPL 6092, dated 11-Nov-2021, copy provided), which is available on the EPA website. Since the previous IEA in 2019 there have been multiple variations to the EPL, including the addition of conditions	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	Applicant to obtain, renew or comply with such licences, permits or approvals.	related to the dioxin exceedances during the WGCP bypass in 2020 (refer to Section 4.2.1 and Appendix B.2). A copy of the approval is stored in Documentum (sighted). Also refer to CC # W-A4.1 above.		
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: • 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). Three environmental related systems / operations were reviewed during the audit: (i) maintenance of the TPM monitors at Point 107 and the inlet duct to the WGCP; (ii) monitoring of bypass conditions using the opacity meters and auto-trip of the Sinter Machine; and, (iii) procedure for preparing to undertake a bypass. **Outlet Dust Monitors at Point 107 and Inlet Duct to WGCP** The monitors are self-calibrating (sighted trending data in CITECT) with a maintenance plan in SAP to remove and clean (SP1296, sighted and screenshot provided). Cleaning is undertaken every six months (example WO30721957 dated November 2021, copy provided) and is next scheduled for May 2022. **CEMS and Auto-Trip of Sinter Machine During Bypass** The total particulate limit in the EPL for the stack (Point 151) during a bypass is 20 mg/m^3 (refer to EPL # 5.5). The 'Procedure for the Investigation of High Dust Emission Levels While the WGCP is Bypassed' was sighted (SP-OPSP-07-31, dated 10 March 2020, copy provided). It is noted in this procedure that the Sinter Machine must be stopped if the 1-hour average reading reaches the high-high limit of 18 mg/m^3.	**Compliant**	**2022/02** - The 'Procedure to Outline the Steps Necessary to Set up the Sinter Machine for WGCP By-pass' (SP-OPSP-07-32) should include the steps required to ensure the composition of the ore blend is modified to minimise dioxin formation prior to a planned bypass or in the event of an emergency bypass.

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		This procedure also includes details of an automated trip added to the Sinter Machine: **Note**: An automatic trip function is included in the PLC that will stop the Sinter Machine or high TPM concentration as follows: • If between 2 hours and 3 hours of a minimum 30 minute machine stop 3A/B Weighted 1 hr Average (F51_FINSWGAB_031967_OT01_avg_pv) > 18 mg/m^3 AND 3A/B instantaneous average (F51_FINSWGAB_031967_OT01_pv) > 18 mg/m^3 • If > 3 hours since a machine stop 3A/B Weighted 1 hr Average (F51_FINSWGAB_031967_OT01_avg_pv) > 18 mg/m^3 The MoC record to add the automated trip to the sinter machine was sighted (Event 4296274, dated 09/03/2020, copy provided) and was noted to be marked as 'complete'. **Preparing for a Bypass** The 'Procedure to Outline the Steps Necessary to Set up the Sinter Machine for WGCP By-pass' was sighted (SP-OPSP-07-32, dated 19 February 2020, copy provided). It was noted that amending the ore blend prior to a bypass (i.e. to prevent a potential dioxin limit exceedance) is not documented in this procedure; however, evidence of adjusting the bed composition prior to most recent bypass in 2021 was sighted ("Sinter Plant Bedly Report", copy not provided). This appeared to have been modified in accordance with the recommendation from the investigation report (i.e. by reducing input of one of the ores to the mix).		

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
B.	**ENVIRONMENTAL MANAGEMENT PLANS**			
B.1	**Construction Management Plan**			
O-6.1	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: (a) a description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant; (b) statutory and other obligations that the Proponent is required to fulfil during construction including all approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies; (c) details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan: 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	The scope of the 2022 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). BSL advised that there have been no new construction activities since the previous IEA in 2019, which appeared to be consistent with observations during the site inspection on 24 February 2022.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	iii. measures to monitor and control noise emissions during construction works. (d) a description of the roles and responsibilities for all relevant employees involved in the construction of the project; (e) the additional studies listed under condition 6.2 of this approval; and (f) complaints and enquiries handling procedures during construction. 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.			
O-6.2	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: (a) where soil testing prior to the commencement of construction identifies the presence of acid sulfate soils, an Acid Sulfate Soil Management Plan prepared in accordance with guidance provided in *Acid Sulfate Soil Manual* (Acid Sulfate Soil Management Advisory Committee, 1998); (b) a Construction Water Management Plan to detail how surface water, groundwater and stormwater will be managed on the site during construction. The Plan shall include use of appropriately-sized stormwater controls, in accordance with *Managing*	The scope of the 2022 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. BSL advised that there have been no new construction activities since the previous IEA in 2019, which appeared to be consistent with observations during the site inspection on 24 February 2022. If BSL undertakes construction work in the future, then any approval would consider the need to manage construction related impacts through new conditions.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	Urban Stormwater: Soils and Construction (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: 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; 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			

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	would be recorded; and, if any non-compliance is detected. (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.			
B.2 Environmental Management Plan				
W-3.2	The Applicant must prepare and implement an Environmental Management Plan for all operations at the site. This plan must: (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;	There is no standalone EMP for the WGCP. The required information is included in various documents. (a) and (b) Is addressed in the Coke and Ironmaking Department Handbook (DH-CI-ADM-00, dated Feb-2020, copy provided) and Process User Requirement Specification (PURS) manuals (sighted, example copy provided for Part 6.0, Dust Management System, MA-OPSP-K-PURS-06, dated 14/07/2017). (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 example record for WGCP stack discharge (2.3.3, copy provided).	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	(e) describe what measures and procedures will be implemented to: • 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: • a Waste Management Plan (Condition 4.39); • a Contingency Plan (Condition 5.11). The Environmental Management Plan must be approved by the Secretary before the Waste Gas Cleaning Plant may be commissioned.	BSL can generate a 'Monthly Environment Report' from MARS (example copy provided for January 2022) and performance is tracked in the Cokemaking & Ironmaking Env. Business Plan Reports (copy provided for July 2021 to February 2022). Targets are set at a coke and ironmaking level (which are then cited in the relevant position descriptions – see (f) below). (e) Incidents are categorised by type and location and incident category. Refer to CC # W-4.55 for complaint management. All incidents (including environmental incidents) are recorded in MARS. BSL's environment team will determine if the 'NSW pollution incident response plan' (sighted, dated June 2021) needs to be activated. This plan is available on BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2021-nsw-monitoring-data/). BSL advised that there were no examples of this plan being triggered for WGCP/OPUP/GP, but an example was sighted for an incident at the Blast Furnace (copy not provided – included record of 5 agency consultation). An example procedure for responding to high dust emission levels from the WGCP stack was also sighted (SP-OPSP-K-WGH-01, dated 1/4/2019, copy provided). (f) The 'Ore Preparation Operations - Organisation Chart' was sighted (example screenshots provided). An example performance and development review was also sighted in PeoplePoint for the Operations Engineer, which includes meeting of environment business plan objectives, etc. (g) It is reported in the 2016 IEA 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).		

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		Similarly, it was reported that the Contingency Plan was submitted (recipient not identified) on 6 Jan 2003. The current Management of Waste Material procedure was sighted (DIV-AR-RS-01, dated April 2020, copy provided). The current Waste Management Plan was also sighted (Excel spreadsheet, MA-OPD-01-03-05, copy provided).		
W-3.3	The Applicant must ensure that a copy of the Environmental Management Plan is submitted to Council and is publicly available.	There is no standalone EMP for the WGCP. The required information is included in various documents (refer to CC # W3.2). This CC was not verified in the IEA reports for 2013 and 2010 and no evidence could be found during the current (or previous) IEAs to demonstrate that all documents constituting the EMP have been submitted to Council. 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. BSL advised that it is proposed to change this condition to be the same as for OPUP (which does not require the EMP to be made publicly available); however, this change is currently on hold pending a final decision on the ACU modification.	**Non-Compliant**	**2022/03** – 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). Note: There is currently no standalone EMP. The required information may be included in various documents (Refer to CC # W3.2). 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

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
				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. Note: This is an open action from previous IEAs. BSL advised that it is proposed to address this action as part of a planned modification to the CCs.
G-3.4 (Super-cedes W-3.4)	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.	There is no standalone EMP for the Gypsum Plant. Example documents comprising the EMP were sighted during the audit (refer to W-3.2).	**Compliant**	
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 2022 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**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
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.	It could not be verified if there have been any specific public requests for documents required under this approval. 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 documentation supporting modifications to this approval that may be granted from time to time; (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; (c) a copy of each strategy, plan and program required under this approval; and (d) the outcomes of any audit in accordance with condition 4.1 of this approval.	Info. on the Sinter Plant Ore Preparation Upgrade website page (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/) 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 CC has been assessed as 'Compliant'.	**Compliant**	
C.2	**Systems for Receiving Complaints and Enquiries**			
W-4.55	Prior to the commencement of construction activities for the Waste Gas Cleaning Plant, the Applicant shall arrange:	Complaints are received via the general enquiries toll free number (1800 800 789), which can be found on the 'Contact	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	• 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 • a postal address where written complaints can be lodged. 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.	Us' website page (http://www.bluescopesteel.com.au/our-company/contact-us). Complaints may also be received via the BlueScope Switchboard on (02) 4275 7522, which can be found on the Sinter Plant Ore Preparation Upgrade website page (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/). 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, last reviewed August 2018, copy provided). Complaints are recorded in MARS (sighted "Complaint" tab in MARS which includes: list of complaints with Reference Number / Title / Received Date / Status - all but one was noted to be marked as complete – one marked as open was recent – dated 21/2/2022). Selecting a complaint provides more detail, including finding of investigation and actions. BSL will then go back to complainant as required. An example for a self-report (SRG offline) was sighted and appeared to be complete (No. C2021202, copy not provided). BSL advised that they don't normally receive complaints by post. Postal addresses can be found on the 'Contact Us' website page (http://www.bluescopesteel.com.au/our-company/contact-us) and the Sinter Plant Ore Preparation Upgrade website page (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/). An advertisement was posted in newspaper (dated 20 February 2008, sighted during a previous IEA). The telephone numbers and postal address are displayed at the entrance gate on Christy Drive (refer to Photograph 7).		

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		Photograph 7 Sign at Entry on Christy Drive (24 Feb. 2022)  		
W-A2.2 [Also EPL # M7.1 to M7.3]	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. 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. This condition does not apply until three months after this condition takes effect.	Same as EPL # M7.1 to M7.3. Refer to CC # W-4.55 above.	**Compliant**	
O-5.2	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):	Refer to CC # W-4.55 above. 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	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	(a) a telephone number on which complaints and enquiries about construction and operational activities at the site may be registered; (b) a postal address to which written complaints and enquiries may be sent; and (c) an email address to which electronic complaints and enquiries may be transmitted. The telephone number, the postal address and the email address shall be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public, and which clearly indicates the purposes of the sign. This information is also to be provided on the Proponent's website.	the 'Contact Us' website page (http://www.bluescopesteel.com.au/our-company/contact-us).		
C.3 Recording of Complaints and Follow-up Actions				
W-A2.1 [Also EPL # M6.1 to M6.4]	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: • 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	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 (No. C2021202, copy not provided), 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. MARS was implemented in June 2012 so records have been maintained as required by this CC. Records since 1 April 2019 were sighted (copy provided) and are summarised in Section 4.2.1.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	• if no action was taken by the licensee, the reasons why no action was taken. The record of a complaint must be kept for at least four years after the complaint was made. The record must be produced to any authorised officer of the EPA who asks to see them.			
O-5.3	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: (a) the date and time, where relevant, of the complaint and enquiry; (b) the means by which the complaint and enquiry was made (telephone, mail or email); (c) any personal details of the complainant and/or enquirer that were provided, or if no details were provided, a note to that effect; (d) the nature of the complaint and enquiry; (e) record of 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. The Complaints and Enquiries Register shall be made available for inspection by the Secretary upon request.	Refer to W-A2.1. (e) Sighted can select wind direction in MARS.	**Compliant**	

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.	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: • BSL has a current EPL licence (EPL 6092, dated 11-Nov-21, copy provided), which is available on the EPA website. Since the previous IEA in 2019 there have been multiple variations to the EPL, including the addition of conditions related to the dioxin exceedances during the WGCP bypass in 2020 (refer to Section 4.2.1 and Appendix B.2). • 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).	The scope of the 2022 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. Contractors are audited with compliance tracked by BSL monthly. An example monthly compliance report was provided for SCE Industrial Services (Jan-2022), which lists examples of the actions / evidence required to demonstrate compliance with EPL licence requirements (e.g. waste management). 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 CCs via the equivalent condition in the EPL (e.g. CC # W-4.6, which relates to noise, is essentially the same as EPL # L6.5 & L6.6).	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
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 2022 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 was categorised as 'Compliant' as outlined above for CC # W-2.1 and no evidence of new construction works was observed during the site inspection on 24 February 2022.	**Compliant**	
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 2022 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 was categorised as 'Compliant' as outlined above for CC # W-2.1 and no evidence of new construction works was observed during the site inspection on 24 February 2022.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
E.	**ENVIRONMENTAL STANDARDS AND CONDITIONS**			
E.3	**Noise – Operations Phase**			
W-4.2	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.	Refer to CC # W-4.6.	**Compliant**	
W-4.6 [Also EPL # L6.5 & L6.6]	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'. *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.* Note: EPL # L6.6 is as follows: *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.* *Noise monitoring must use the "FAST" response on the sound level meter.* *Note: Noise impacts that may be enhanced by temperature inversions shall be addressed by:* *a) documenting noise complaints received to identify any higher level of impacts or patterns of temperature inversions; and*	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 was originally the Gabriella Memorial site on Christy Drive. Note: The memorial has been relocated; however, the noise monitoring is still undertaken at the original location in accordance with EPL # L6.5. BSL advised that multiple noise reports have been submitted to DPIE 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". Surveys are undertaken every 5 years, so the 7-Feb-19 report (which was provided during the previous IEA in 2019) is still current. BSL has not recorded any noise complaints since the previous IEA in 2019 (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).	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	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.			
W-4.7	Noise impacts that may be enhanced by temperature inversions shall be addressed by: • 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 2019 (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 $L_{Aeq(15\ minute)}$. 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 2022 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 2019 (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	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	a) measured at the most affected point on or within the site boundary at the most sensitive receiver to determine compliance with $L_{Aeq(15\ minute)}$ night noise limits; b) measured at one metre from the dwelling facade to determine compliance with $L_{A1(1\ minute)}$ noise limits; and c) subject to the modification factors provided in Section 4 of the New South Wales Industrial Noise Policy (EPA, 2000), where applicable. Notwithstanding, should direct measurement of noise from the development be impractical, the Proponent may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the New South Wales Industrial Noise Policy (EPA, 2000), where applicable. 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.	condition # L6. This includes locations that differ from CC # O-2.10. 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 $L_{Aeq(15\ minute)}$ noise limit is 70 DB(A). The EPL does not currently nominate a location or DB(A) limit for monitoring noise at the nearest affected residence. The scope of the 2022 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). BSL has not recorded any noise complaints since the previous IEA in 2019 (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).		
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).	**Refer to relevant CCs below**	
O-2.1	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.	BSL has not recorded any odour complaints for the Sinter Plant (including the OPUP) since the previous IEA in 2019 (refer to Section 4.2.1) and offensive odour was not identified as a concern during consultation prior to the audit (refer to 2.3.1). Note: This facility is not generally a source of odour emissions, which is evidenced by the absence of odour limits in the EPL.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
W-4.11 [Also EPL # O4.16]	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. *Note: Normal operation excludes the first two-hours of operation following start up.*	EPL # O4.16 is as follows: *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/Nm^3 for particulate matter.* *Note: Normal operation excludes the first two hours of operation following start up.* Therefore, EPL # O4.16 is similar to CC # W-4.11 but adds a 20 mg/Nm^3 criterion for particulate matter to enable an assessment of 'visibility'. There have been two self-reports of a visible emissions from the WGCP stack since the previous IEA in 2019 (refer to Section 4.2.1); however, these were during the first two-hours of operation following start up (May and September 2020). 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 for: • c. January 2018 to December 2021 via the 'EHS Data Monitor Pro' web-based application (copy provided). • March 2019 to December 2021 on the 'NSW Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2021-nsw-monitoring-data/). The reported monitoring results for the WGCP stack confirm a total particulate matter measurement less than the 20 mg/Nm^3 criterion. It was not possible to sight the continuous monitoring reading at the control room during the site inspection due to COVID restrictions. A photograph was provided by BSL on 22 March	**Compliant**	**2022/04** – 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 by amending the relevant conditions. Note: This is an open action from previous IEAs. BSL advised that it is proposed to address this action as part of a planned modification to the CCs.

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		2022 and the reading was observed to be 6 mg/Nm^3 at the outlet (refer to Photograph 6 in Section 3.6). BSL advised that this display has been updated for bypass conditions, so it measures the opacity meters for TPM (not verified). It is noted that compliance with the 20 mg/Nm^3 criterion does not necessarily mean that the emissions are not visible. Actions were included in previous IEAs to investigate and resolve this apparent inconsistency but do not appear to have been closed.		
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. Note: EPL # O3.1 is as follows: *Activities occurring at the premises must be carried out in such a manner that fugitive dust emissions from the activities are minimised.*	Dust emissions are required to be managed in accordance with the Fugitive Dust Management System (FDMS) (Divisional procedure MA-ENV-02-02, dated October 2019, copy provided), which requires additional controls on a case-by-case basis. During the site inspection on 24 February 2022, the WGCP was observed to be maintained in a manner that minimises dust generation (Note: It was raining heavily during the site inspection). For example: • The roadways appeared to have been swept by the mobile sweepers (refer to Photograph 9, Photograph 10 and Photograph 11). • There were no obvious dust emissions from plant or equipment at the WGCP. In December 2021, there was spill of powdered lime during unloading of a truck (i2032803, copy provided). The incident report notes that "The majority of the spilled lime was cleaned off the road and walkway with a bobcat and brooms and shovels, a street sweeper and water cart then cleaned up the remainder." This does not appear to have resulted in an emission from the premises.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
W-4.13 & O2.6	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.	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 2019 (also refer to Sections 4.2.1 and 4.3.1).	**Non-Compliant**	
O-2.2 [Also EPL # O3.1]	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. Note: EPL # O3.1 is as follows: *Activities occurring at the premises must be carried out in such a manner that fugitive dust emissions from the activities are minimised.*	Dust emissions are required to be managed in accordance with the Fugitive Dust Management System (FDMS) (Divisional procedure MA-ENV-02-02, dated October 2019, copy provided), which requires additional controls on a case-by-case basis. BSL advised that water carts and road sweepers are used (as observed during previous IEAs); however, these vehicles were not observed the site inspection on 24 February 2022 as it was raining heavily. BSL advised that the precipitators were washed down prior to recent maintenance so as to mitigate potential dust emissions (video evidence provided). 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) and there were no obvious dust emissions from plant or equipment at the Sinter Plant outside the main building.	**Compliant**	
O-2.3 [Also EPL # O3.4]	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.	Dust emissions are required to be managed in accordance with the Fugitive Dust Management System (FDMS) (Divisional procedure MA-ENV-02-02, dated October 2019, copy provided), which requires additional controls on a case-by-case basis. 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	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	Note: EPL # O3.4 is as follows: *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.* *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.)*	that "Every dry bulk material loaded truck must be covered before leaving the PKSW site". 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 vehicles entering or leaving the Sinter Plant since the previous IEA in 2019 (refer to Section 4.2.1). 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.		
O-2.4	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.	Dust emissions are required to be managed in accordance with the Fugitive Dust Management System (FDMS) (Divisional procedure MA-ENV-02-02, dated October 2019, copy provided), which requires additional controls on a case-by-case basis. BSL has not recorded any complaints regarding dust emissions beyond the boundary of the site since the previous IEA in 2019 (refer to Section 4.2.1). There we no obvious visible dust emissions beyond the boundary of the site during the site inspection on 24 February 2022; (Note: it was raining heavily during the site inspection).	**Compliant**	
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 24 February 2022, the majority of the internal roads, trafficable areas and manoeuvring areas at the Sinter Plant were observed to be sealed. Only the 'overflow' car parking area near the Sinter Plant offices is not sealed (water carts were observed during the previous IEA in 2019 to be wetting down this area to minimise the potential for dust generation – This was not observed during the site inspection on 24 February 2022; however, this visit occurred during a period of heavy rainfall).	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
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. This equates to c. 7 hr residence time in the regenerator. The rate through the regenerator was reported to be c. 9.4 to 11.3 tph for 13/12/2018 to 30/1/2022 (Screenshot of tph records, copy provided). Monitoring results from 'EHS Monitor Pro' for dioxins at the WGCP stack (data provided for c. January 2018 to December 2021) indicate that dioxins are below 0.05 ng/m^3 and therefore below the EPL limit of 0.3 ng/m^3 (as per EPL # L3.4 table of Air Concentration Limits for Pt 107) and the 0.1 ng/m^3 design target (as per EPL # L3.4, Note 2 b)).	**Compliant**	
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. BSL consulted with NSW Department of Primary Industries (DPI) and NSW Health (PowerPoint presentation "Gypsum: Use as a Soil Amendment", copy provided) to verify that Gypsum is not considered a fertiliser (it is a soil 'amendment'). Use as a soil amendment has been accepted by the NSW DPI (email dated 29/10/2021, copy provided) and EPA (email dated 18/11/2021, copy provided), but not implemented.	**Not Triggered**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
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 summary report (Excel spreadsheet) is submitted to the EPA (for discussion during 12 weekly meetings), which includes the status of the regenerator and SRG plant. An example report was sighted for November 2021 (copy provided). This includes the % availability of the SRG plant for January to October 2021. This has been assessed as an 'Compliant' since BSL appear to be attempting to operate the plant to ensure maximum *practicable* recovery, Gypsum production does not appear to be reducing (Based on Excel Spreadsheet of Weighbridge data from 01/02/2019 to 22/02/2022, copy provided) and BSL 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 on 24 February 2022.	**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**	
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.	**Groundwater** The EPL includes requirements for a Groundwater Monitoring Program (EPL # E3.1); however, this does not appear to specifically relate to the Sinter Plant (including WGCP and Gypsum Plant). BSL advised that an updated groundwater monitoring report for the PKSW was submitted to the EPA in Dec 2021 (based on	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		sampling from Sept-Oct 2021 – Example data sighted). BSL advised that they have not received any feedback from the EPA (not verified). **Surface Water** Stormwater from the Sinter Plant area (including WGCP and Gypsum Plant) is directed to the 4BF Thickener for clarification before discharge to the IMED. The stormwater / process water collection / treatment facilities for the Sinter Plant (including the IMED) were observed during the site inspection on 24 February 2022 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. The IMED Drainage Diversion Project (PRP 176) was completed in August 2017. As a result, the IMED does not normally discharge to the harbour under dry weather conditions and the monitoring results for Pt 89 (IMED) currently comply with EPL limits (refer to EPL # L3.5, M2.5, M2.6 and M8.1).		
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.	Stormwater from the Sinter Plant area (including WGCP and Gypsum Plant) is directed to the 4BF Thickener for clarification before discharge to the IMED. Such an emission would only potentially arise due to overflow of the IMED. The IMED Drainage Diversion Project (PRP 176) was completed in August 2017. As a result, the IMED does not normally discharge to the harbour under dry weather conditions and the monitoring results for Pt 89 (IMED) currently comply with EPL limits (refer to EPL # L3.5, M2.5, M2.6 and M8.1).	**Compliant**	
E.11 Stormwater Management				
W-4.33	Prior to construction, the Applicant must prepare a detailed Stormwater Management Plan for the site, which	The scope of the 2022 IEA did not include a detailed assessment of compliance with the CCs for the construction,	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	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).	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. No evidence of new construction works was observed during the site inspection on 24 February 2022.		
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 pollutants from the Waste Gas Cleaning Plant during wet weather and to meet Licence Limit conditions for wet weather detailed in the EPL.	Stormwater from the Sinter Plant area (including WGCP and Gypsum Plant) is directed to the 4BF Thickener for clarification before discharge to the IMED. 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). The IMED Drainage Diversion Project (PRP 176) was completed in August 2017. As a result, the IMED does not normally discharge to the harbour under dry weather conditions and the monitoring results for Pt 89 (IMED) currently comply with EPL limits (refer to EPL # L3.5, M2.5, M2.6 and M8.1). The stormwater / process water collection / treatment facilities for the Sinter Plant (including the IMED) were observed during the site inspection on 24 February 2022 and no deficiencies were observed.	**Compliant**	
O-2.11	The Proponent shall install stormwater drains, stormwater ponds, settlement ponds and/or storage ponds and other erosion, sediment and pollution controls	The scope of the 2022 IEA did not include a detailed assessment of compliance with the CCs for the construction,	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	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.	commissioning and initial operations phases (refer to Section 1.4). However, this CC is marked as complete in the 2013 IEA. Stormwater from the Sinter Plant area (including WGCP and Gypsum Plant) is directed to the 4BF Thickener for clarification before discharge to the IMED. The stormwater / process water collection / treatment facilities for the Sinter Plant (including the IMED) were observed during the site inspection on 24 February 2022 and no deficiencies were observed.		
O-2.12	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 the Protection of the Environment Operations Act 1997 which prohibits the pollution of waters.	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. Monitoring data is reported monthly on the 'NSW Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2021-nsw-monitoring-data/). As of 4 April 2022, this website was observed to include monthly reports for April 2012 to December 2021. BSL advised that data for 2022 had not been published yet as some results were still being analysed. The IMED Drainage Diversion Project (PRP 176) was completed in August 2017. As a result, the IMED does not normally discharge to the harbour under dry weather conditions and the monitoring results for Pt 89 (IMED) currently comply with EPL limits (refer to EPL # L3.5, M2.5, M2.6 and M8.1). The stormwater / process water collection / treatment facilities for the Sinter Plant (including the IMED) were observed during the site inspection on 24 February 2022 and no deficiencies were observed.	**Compliant**	

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.	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: *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.* *1. 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.* *The program must include details on but need not necessarily be limited to the following:* *a) monitoring methodologies and standards to be employed to assess radionuclides and their pathways in any air emissions and water discharges during plant operations;* *b) radionuclide species;* *c) monitoring location(s);* *d) monitoring frequency;* *e) representativeness of the sampling;* *f) assessment of results, including Australian and International Standards;* *g) reporting;* *h) process description and variability;* *i) issues relevant to particle size distribution of particulate materials and*	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		j) opportunities to integrate with other monitoring programs. 2. *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.* 3. *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.* 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).		
E.14 Spillage Response				
W-4.38	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.	Dust emissions are required to be managed in accordance with the Fugitive Dust Management System (FDMS) (Divisional procedure MA-ENV-02-02, dated October 2019, copy provided), which requires additional controls on a case-by-case basis. Dust is collected in the WGCP dedusting system and cyclone system (AC screen). This is collected and transported by truck to stockpile area. An example procedure was sighted for cleaning the heat exchanger for the WGCP regenerator fans (dated 03.08.2021, copy provided). This includes a requirement to report any incidents and includes measures to minimise potential impacts of a spillage, such as: bunding the area with sandbags; lining	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		the sump with plastic as a catchpoint for run-off and for a vac-truck to recover any wastewater; vacuuming of any and all loose material e.g. Char, dust etc. from tube bundles; etc. Photographic evidence from the most recent clean was provided for some of the measures (copies provided). Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED Drainage Diversion Project (PRP 176) was completed in August 2017. As a result, the IMED does not normally discharge to the harbour under dry weather conditions and significantly reduces the likelihood of any particulates or debris being discharged off-site with surface water runoff.		
E.15 Waste Generation and Management				
W-4.39	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: • 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. The Waste Management Plan prepared must be approved by the Secretary prior to commissioning of the development.	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)". This CC has been assessed as 'Compliant' since: • The waste register for the coke and ironmaking department was sighted on the BSL Intranet (example screenshot provided) and appeared to confirm that the waste has been classified (refer to CC # W-4.41 below). • The current Management of Waste Material procedure was sighted (DIV-AR-RS-01, dated April 2020, copy provided). • The current Waste Management Plan was sighted (Excel spreadsheet, MA-OPD-01-03-05, copy provided). This	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		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 24 February 2022 (refer to CC # O-2.13 below).		
W-4.40	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.	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)". This CC has been assessed as 'Compliant' since this CC is marked as complete in the 2016 IEA (refer to Section 1.4).	**Compliant**	
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 (*Management of Waste Material*, DIV-AR-RS-01, dated April 2020, 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 on the BSL Intranet (example screenshot 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 24 February 2022 (refer to CC # O-2.13).	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		If no recycling option exists for the material within BSL, then the divisional procedure requires identification of re-cycling options outside the company (*Management of Waste Material*, DIV-AR-RS-01, dated April 2020, copy provided). BSL has completed trials to determine if waste char can be recycled; however, other options are also being considered (e.g. charging ACU into the Blast Furnace via the PCI Plant) (refer to Section 4.2.2). BSL is also investigating recycling of the electrostatic precipitator (EP) dust back to the Sinter Machine, which was part of the original design. BSL advised that the EP dust was removed from the process during initial operation of the WGCP as it was suspected of being a source of potential blockages in the adsorbers, but subsequently it has been determined that blockages were due to another cause. Blockage at the adsorbers is no longer an issue, but it is not straightforward to return EP dust to the Sinter Machine as it also raises the potential for 'upcycling'. A stockpile of EP dust has been established (refer to Photograph 20) and a draft management plan was submitted to the EPA for feedback on 30/11/2021. BSL has trialled return of EP dust and proposes further trials (as reported in minutes of EPA - Ore Preparation Meeting, dated November 2021, copy provided). BSL advised that reuse of the EP dust is expected to occur within the next three years (i.e. before next IEA).		
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 2022 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 as being complete	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		in the EPL (completed June 2007), and the CC is marked as complete in the 2013 IEA. Segregation of waste materials into dedicated waste storage skips was also observed on site during the site inspection on 24 February 2022 (refer to Photograph 8). **Photograph 8 Waste Storage Skips (24 February 2022)**  Reuse of ACU and EP dust is under investigation (refer to CC # W-4.42 and Section 4.2.2)).		
O-2.14 [Also EPL # L5.1]	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.	EPL # L5.1 includes the list of permitted wastes. BSL advised that is not normal to receive wastes generated from off-site and that this has not occurred since the 2019 IEA. Although not verifiable, this has been categorised as compliant since the Sinter Plant (including WGCP and Gypsum Plant) do not have appear to have the capacity to process external waste	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	Note: EPL # L5.1 is as follows: *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.* *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.* *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.* *This condition does not limit any other conditions in this licence.*	and no evidence of such materials was sighted during the site inspection on 24 February 2022.		
O-2.15	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.	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 (*Management of Waste Material*, DIV-AR-RS-01, dated April 2020, 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 on the BSL Intranet (example screenshot provided) and appeared to confirm that the waste has been classified.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
E.16 Roads and Traffic				
W-4.45	All chemicals being transported to the site must follow the route set out in the SEE.	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. It is reported in the most recent 'Triennial Report' (copy provided) that the Ammonia Plant at the Waste Gas Cleaning Plant was decommissioned on 14 December 2018. Therefore, BSL are not currently transporting Ammonia to the site. It was not possible within the scope of the current IEA to determine if all chemicals have been transported in accordance with the routes specified in the SEE; therefore, this was again categorised as 'Non-Compliant'.	**Non-Compliant**	**2022/05** - It was not possible within the scope of the current IEA to determine if all chemicals have been transported to the site in accordance with the routes specified in the SEE (CC # W-4.45) or that all non-liquid waste leaving the site have followed the route set out in Figure 5.4 of the SEE (CC # W-4.46). It is understood that some materials are not being transported (e.g. Ammonia); however, BSL should undertake a review of current transport routes and seek an amendment to CC # W-4.45 and W-4.46 that will permit the assessment and use of alternative routes (particularly where these would pose a lower overall risk).
W-4.46	The transport route for the non-liquid waste leaving the site must follow the route set out in Figure 5.4 of the SEE.	The 2002 transport study was supplied by BSL as defining the routes set out in the SEE (Since the SEE was not provided, it is not clear if this transport study is consistent with the SEE), which specified the following route for Waste Dust – Route 5: Wollongong to Kemps Creek via the Southern Freeway to Mount Ousley, then the Picton Road to Wilton, Hume Highway	**Non-Compliant**	Refer to **2022/05**.

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		to Camden Valley Way and then Cowpasture Road to Elizabeth Drive. Waste dust is not currently being transported from the PKSW whilst investigating re-use options, although it is transported from the Sinter Plant / WGCP to the stockpile area. It was not possible within the scope of the current IEA to determine if all non-liquid wastes leaving the site have been transported in accordance with the routes specified in the SEE; however, new transport route options are available that may be in use (e.g. M7). Therefore, this was again categorised as 'Non-Compliant'.		
W-4.47	The developer must ensure that sufficient parking is provided on site for all vehicles associated with the construction and operation of the plant. No vehicles associated with the proposed development are to park along Christy Drive or Old Port Road.	New access arrangements have been provided since the previous IEA in 2019, which have eliminated parking along Christy Drive. The new access arrangements ensure use of dedicated vehicle parking areas for BSL personnel and visitors. Two additional car parks are also provided outside the Sinter Plant Administration Building.	**Compliant**	
W-4.48	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.	The scope of the 2022 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 was marked as complete in the 2013 IEA. An example Transport Management Plan for delivery of the new stack segments (up to 6.9 m diameter) was sighted (dated 21/12/2020, copy provided). It is reported in this plan that "Permits to complete this project will be required from the following parties: • RMS over size over mass permit • All loads to be escorted by various pilots and police where required • Relevant council approvals	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		• Electrical Approval" Whilst evidence of obtaining these permits was not sighted, this condition was categorised as 'Compliant' as no issues were raised by the authority representatives prior to the IEA (refer to Section 2.3.1).		
E.17 Site Management				
W-4.49	Stockpiles of sand, gravel, soil and the like must be located to ensure that the material: • does not spill onto the road pavement; and • is not placed in drainage lines or water courses, and cannot be washed into these areas. 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.	During the site inspection on 24 February 2022, the majority of the drains and roadways at the WGCP were observed to be clear of stockpiles of sand, gravel, soil and the like. Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED Drainage Diversion Project (PRP 176) was completed in August 2017. As a result, the IMED does not normally discharge to the harbour under dry weather conditions and significantly reduces the likelihood of any particulates or debris being discharged off-site with surface water runoff.	**Compliant**	
W-4.50	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.	During the site inspection on 24 February 2022, drains, gutters, access ways and roadways at the WGCP were observed to be mostly free of sediment and any other material, particularly in the vicinity of the WGCP (refer to Photograph 9). Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED Drainage Diversion Project (PRP 176) was completed in August 2017. As a result, the IMED does not normally discharge to the harbour under dry weather conditions and significantly reduces the likelihood of any particulates or debris being discharged off-site with surface water runoff.	**Compliant**	
W-4.51	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	The scope of the 2022 IEA did not include a detailed assessment of compliance with the CCs for the construction,	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	public footpath or any other locations which could lead to the discharge of materials into the stormwater drainage system or natural watercourse.	commissioning, and initial operations phases (refer to Section 1.4). This CC has is marked as complete in the 2013 IEA. No activities of this type were observed during the site inspections on 24 February 2022; however, the following examples demonstrate the control of potential discharges into the site stormwater drainage system: • The precipitators were washed down prior to recent maintenance so as to mitigate potential dust emissions (video evidence provided). This included installation of temporary sand bagging and tarpaulins (photographic evidence provided). • An example procedure was sighted for cleaning the heat exchanger for the WGCP regenerator fans (dated 03.08.2021, copy provided). This includes measures to minimise potential impacts of a spillage, such as: bunding the area with sandbags; lining the sump with plastic as a catchpoint for run-off and for a vac-truck to recover any wastewater; vacuuming of any and all loose material e.g. Char, dust etc. from tube bundles; etc. Photographic evidence from the most recent clean was provided for some of the measures (copies provided). Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED Drainage Diversion Project (PRP 176) was completed in August 2017. As a result, the IMED does not normally discharge to the harbour under dry weather conditions and significantly reduces the likelihood of any contaminant being discharged off-site with surface water runoff.		
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	The scope of the 2022 IEA did not include a detailed assessment of compliance with the CCs for the construction,	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	with the BHP Environmental Improvement Program – Masterplan for the Steelworks Site.	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.		
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 2019 (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.	BSL advised that the hierarchy of environmental related training is as follows: **Illawarra Site** 1. 'Illawarra Site Induction' – This is a high-level induction and refers to BSL's HSEC policy (not verified). 2. 'Illawarra Sites Environment Awareness Training' (Qualification No. 52002852, dated 07/10/2020, copy provided) - This is the main environmental awareness training module at an Illawarra site level. It is a training presentation (19 slides) rather than an eLearning module. 3. 'Illawarra Waste Management Awareness' (copy not provided). 4. 'Fugitive Dust Management Awareness' (copy not provided). **Ore Preparation** 5. 'Ore Preparation Departmental Induction and Conveyor Safety' (Note: Qualification No. 52002065, also referred to as the 'Ore Preparation Safety Induction, copy not provided). 6. 'Ore Prep Environment Awareness' (copy provided).	**Compliant (Staff and Embedded Contractors)** **Non-Compliant (Other Contractors)**	**2022/06** - Contractors should also complete the 'Ore Prep Environment Awareness' training module and evidence of completion of environmental awareness training should be included in the ComplyFlow tracking system.

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		An example 'Ore Preparation Training Matrix' (Excel spreadsheet, dated 15-Feb-2022) was provided for Crew B. The following environmental training is listed in this training matrix: • 'Illawarra Site Induction' (all up-to-date). • 'Illawarra Waste Management Awareness' (all complete). • 'Fugitive Dust Management Awareness' (majority complete). • 'Ore Preparation Safety Induction' (all complete). • 'Ore Prep Environment Awareness' (all complete). BlueScope personnel and embedded contractors are required to complete all of the training listed above. Other contractors are required to complete the 'Illawarra Site Induction' and the 'Ore Preparation Departmental Induction and Conveyor Safety' training. BSL advised that other contractors are not currently required to complete the 'Ore Prep Environment Awareness' training module.		
G. ENVIRONMENTAL REPORTING				
G.1 Annual Return				
W-A3.1 [Also EPL # R1.1]	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: • a Statement of Compliance; and • a Monitoring and Complaints Summary. 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.	The Annual Returns for 2018–2019, 2019-2020 and 2020-2021 were sighted (copies provided) and include a Statement of Compliance and Monitoring and Complaints Summary. Note: Annual Returns are 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. Receipts from eConnect confirming submission were sighted for all three Annual Returns (copies provided) and the receipt of the Annual Returns for EPL No. 6092 is reported 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
	Note: EPL # R1.1 is as follows: *The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:* *1. a Statement of Compliance,* *2. a Monitoring and Complaints Summary,* *3. a Statement of Compliance - Licence Conditions,* *4. a Statement of Compliance - Load based Fee,* *5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,* *6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and* *7. a Statement of Compliance - Environmental Management Systems and Practices.* *At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.*			
W-A3.2 [Also EPL # R1.2 to R1.4]	An Annual Return must be prepared in respect of each reporting, except as provided below 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. Where this licence is transferred from the licensee to a new licensee: • 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	The Annual Returns for 2018–2019, 2019-2020 and 2020-2021 were sighted (copies provided) – Refer to CC # W-A3.1. BSL advised that 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.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	• 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. Note: An application to transfer a licence must be made in the approved form for this purpose. 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: • 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]	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'). Note: EPL # R1.1 is as follows: *The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:* *1. a Statement of Compliance,* *2. a Monitoring and Complaints Summary,* *3. a Statement of Compliance - Licence Conditions,* *4. a Statement of Compliance - Load based Fee,*	The Annual Returns for 2018–2019, 2019-2020 and 2020-2021 were sighted (copies provided) and include a Statement of Compliance and Monitoring and Complaints Summary. Note: Annual Returns are submitted using an on-line system (i.e. not by 'registered post'). Receipts from eConnect confirming submission were sighted for all three Annual Returns (copies provided) and the receipt of the Annual Returns for EPL No. 6092 is reported 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
	5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, *6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and* *7. a Statement of Compliance - Environmental Management Systems and Practices.* *At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.*			
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: • the assessable pollutants for which the actual load could not be calculated; and • the relevant circumstances that were beyond the control of the licensee.	The Annual Return is due in August each year. This is consistent with receipts from eConnect confirming submission for the 2018–2019, 2019-2020 and 2020-2021 Annual Returns (copies provided).	**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.	The Annual Returns for 2018–2019, 2019-2020 and 2020-2021 were sighted (copies provided) These are stored in Documentum (sighted) and it was observed that electronic copies are held dating back to 2013.	**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: • the licence holder; or • by a person approved in writing by the EPA to sign on behalf of the licence holder.	The Annual Returns for 2018–2019, 2019-2020 and 2020-2021 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. Receipts from eConnect confirming submission were sighted for all three Annual Returns (copies	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	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.	provided) and the receipt of the Annual Returns for EPL No. 6092 is reported on the EPA website (https://apps.epa.nsw.gov.au/prpoeoapp/).		
G.3 Environmental Management Report				
W-7.4	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: (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: (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;	The most recent 'Triennial Environmental Management Report' (EMR) for 1-Jul-2017 to 30-Jun-2020 was submitted to DPIE on 23-October-2020. 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) and is available on the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/). In the response to BSL's submission of the 2017-2020 'Triennial Environmental Management Report', DPIE has reported that "The Department considers that the Triennial Report generally satisfied Conditions 7.4 of the approval" (letter dated 17/11/2020, copy provided).	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	(e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next three years to improve the environmental performance of the development.			
W-7.5	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.	Refer to CC # W-7.4. DPIE's response to BSL's submission of the 2017-2020 'Triennial Environmental Management Report', did not require any additional matters to be addressed (letter dated 17/11/2020, copy provided).	**Compliant**	
O-7.2	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: (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; (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: (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	The most recent 'Triennial Environmental Management Report' (EMR) for 1-Jul-2017 to 30-Jun-2020 was submitted to DPIE on 23-October-2020. 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) and is available on the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/). In the response to BSL's submission of the 2017-2020 'Triennial Environmental Management Report', DPIE has reported that "The Department considers that the Triennial Report generally satisfied Condition 7.2 of the approval." (letter dated 17/11/2020, copy provided).	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	(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	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.	Refer to CC # O-5.4 and O-7.2. In the response to BSL's submission of the 2017-2020 'Triennial Environmental Management Report', DPIE only required the following: "in accordance with Schedule 2, Condition 5.4 please make the copy of the Triennial Report available on the company website, including any other documents as required under Condition 5.4 and also ensure that these documents are up-to-date." (letter dated 17/11/2020, copy provided). The most recent 'Triennial Environmental Management Report' (EMR) for 1-Jul-2017 to 30-Jun-2020 is available on the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/sinter-plant-ore-preparation-upgrade/).	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
G.4 Independent Environmental Audit				
W-7.6	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; (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.	The previous IEA was undertaken during February-April 2019 (final report dated 23 April 2019). It is noted in the acceptance letter from the DP&E for previous IEA (letter dated 9-May-2019, copy provided) that the report "generally satisfied Schedule 2, Condition 7.6 and Schedule 2, Condition 4.1 of the respective approvals".	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
W-7.7	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.	The previous IEA was undertaken during February-April 2019 (final report dated 23 April 2019). It is noted in the acceptance letter from the DP&E for previous IEA (letter dated 9-May-2019, copy provided) that the report "generally satisfied Schedule 2, Condition 7.6 and Schedule 2, Condition 4.1 of the respective approvals". The status of the corrective actions identified in the 2019 IEA is reported in Section 4.3.5.	**Compliant**	
O-4.1	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.	The previous IEA was undertaken during February-April 2019 (final report dated 23 April 2019). It is noted in the acceptance letter from the DP&E for previous IEA (letter dated 9-May-2019, copy provided) that the report "generally satisfied Schedule 2, Condition 7.6 and Schedule 2, Condition 4.1 of the respective approvals".	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
O-4.2	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.	The previous IEA was undertaken during February-April 2019 (final report dated 23 April 2019). It is noted in the acceptance letter from the DP&E for previous IEA (letter dated 9-May-2019, copy provided) that the report "generally satisfied Schedule 2, Condition 7.6 and Schedule 2, Condition 4.1 of the respective approvals". The status of the corrective actions identified in the 2019 IEA is reported in Section 4.3.5.	**Compliant**	
G.5 Incident Reporting				
O-7.1	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. 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.	Reporting requirements are included in the *Significant Environmental Incident Investigation and Reporting Process* (MA-ENV-11-01, dated August 2018, copy provided). It is reported in Section 5.2 of this procedure that: *In accordance with EPL 6092, reporting requirements exist for licence non-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.* The most significant incident recorded since the previous IEA in 2019 relates to exceedances of EPL concentration limits for dioxins and furans at Pt 151 during the bypass in 2020 (also refer to Section 4.2.1). The corresponding record in MARS (i1718603, copy provided) is flagged as being "Environment Authority notifiable" and indicates the name of the EPA officer contacted. The actual and potential environmental consequence rating is recorded in MARS as level 2, which is a "LAWWNE impact that is localised on-site and can be addressed in the short term, with little (nuisance) effect off-site that can be promptly addressed." Furthermore, it is reported	**Not Triggered**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		in the EPA Penalty Notice (dated 22 July 2022, copy provided) that "In response to the non-compliances BSL undertook air emissions modelling populating the site wide PRP 131 model with the dioxin emissions data. The modelling showed compliance with relevant environmental and health criteria (Ground Level Concentration criteria)". Based on the evaluations outlined above, the exceedances of the EPL concentration limits for dioxins and furans do not appear to be an "incident that causes (or may cause) harm to the environment". Consequently, this condition has been categorised as "Not Triggered".		
W-A3.7 [Also EPL # R2.1 to R2.2]	*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.* Notifications must be made by telephoning the EPA's Pollution Line service on 131 555. The licensee must provide written details of the notification to the EPA within seven days of the date on which the incident occurred.	Also refer to CC # O-7.1 above. Clause 147 in Part 5.7 of the Act is as follows: *(a) harm to the environment is material if—* *(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or* *(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and* *(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.* Based on the evaluations outlined in CC # O-7.1 above, the exceedances of the EPL concentration limits for dioxins and furans have been categorised as non-compliances with EPL condition E5.5 rather than "incidents causing or threatening material harm to the environment". The EPA Penalty Notice	**Not Triggered**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		(dated 22 July 2022, copy provided) specifically refers to non-compliances with the EPL E5.5 concentration limits and BSL do not appear to have penalised due to failure to notify in accordance with the EPL conditions or Clause 152 of the POEO Act. Consequently, this condition has been categorised as "Not Triggered" even though an investigation report was subsequently submitted to the EPA (refer to CC # W-A3.8).		
W-A3.8 [Also EPL # R3.1 to R3.4]	Where an authorised officer of the EPA suspects on reasonable grounds that: • where this licence applies to premises, an event has occurred at the premises; or • 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. 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. The request may require a report which includes any or all of the following information: • the cause, time and duration of the event; • the type, volume and concentration of every pollutant discharged as a result of the event;	Also refer to CC # O-7.1 above. It is reported in the EPA Penalty Notice (dated 22 July 2022, copy provided) that BSL "submitted an Incident Report to the EPA on 8 May 2020, a Review of Human Health Risks Report on 25 May 2020, and a Show Cause Letter Response on 6 July 2020." It is reported in the incident investigation report (copy provided) that it was requested by the EPA on 23 April 2020 in relation to the Sinter Machine Stack Dioxins and Furans Exceedance on 26 March 2020 and on 7 May this request was extended to include the Sinter Machine Stack Dioxins and Furans Exceedances on 6, 20, 23, 27, 28 April 2020. The incident investigation report (copy provided) appears to address the information listed under this condition and it is noted in the EPA Penalty Notice (dated 22 July 2022, copy provided) that four new conditions were added to the EPL.	**Compliant**	

CC #	Condition of Development Consent	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	• 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; • 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. 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.			

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 to EPL Point 151).

Table 12 Audit Findings (Additional Conditions from EPL)

<table>
<tr><th>EPL #</th><th>Condition of EPL</th><th>Evidence and Finding/s</th><th>Compliance Assessment</th><th>Recommended Action/s</th></tr>
<tr><td colspan="5">LIMIT CONDITIONS</td></tr>
<tr><td colspan="5">L2 Load Limits</td></tr>
<tr><td>L2.4</td><td>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.
<table>
<tr><th>Discharge Point</th><th>Pollutant</th><th>Units of Measure</th><th>Total Mass Limit</th><th>Method</th></tr>
<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>
</table></td><td>The annual mass load of solid particles discharged at Pt 107 (WGCP stack) was reported to range from 30.3 to 46 tonnes for 2018-2019 to 2020-2021:
<table>
<tr><th>Total Mass Discharged (tonnes per annum)</th><th>Source</th></tr>
<tr><td>46</td><td>Licence Monitoring Data, Annual Summary Report, 1 Jul 2018 to 30 Jun 2019</td></tr>
<tr><td>30.3</td><td>Licence Monitoring Data, Annual Summary Report, 1 Jul 2019 to 30 Jun 2020</td></tr>
<tr><td>33.7</td><td>Licence Monitoring Data, Annual Summary Report, 1 Jul 2020 to 30 Jun 2021</td></tr>
</table>
The total forecast for 1 Jul 2021 to 31 Jan 2022 is estimated to be 34.1 tonnes based on the available data reported on the ‘Monitoring Data’ page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2021-nsw-monitoring-data/).</td><td>Compliant</td><td></td></tr>
</table>

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
L3	**Concentration Limits**			
L3.1 to L3.3	For each monitoring/discharge point or utilisation area specified in the table\s 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. Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges. To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\s.	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	Air Concentration Limits *NOTE: TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.* Note: 2. Notes relating to Discharge Point 107 – Sinter Plant Waste Gas Cleaning Plant Stack 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. A program may be developed through the licensing process to address this issue. 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	**Point 2 (Sinter Machine Room Dedusting Stack) and Point 107 (Sinter Plant WGCP Exhaust Stack)** 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. 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/2021-nsw-monitoring-data/). As of 4 April 2022, this website was observed to include monthly reports for April 2012 to December 2021. BSL advised that data for 2022 had not been published yet as some results were still being analysed. The available reported data indicates compliance with the EPL limits for Point 2 and Point 107 since the previous IEA in 2019 and this is consistent with the corresponding Annual Returns.	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	(TCDD) equivalent, WHO 2005 TEF, dry 101.3 kPa, 273 K, 15.7% O2 in waste gases at Point 107. 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.	Monitoring results from 'EHS Monitor Pro' for dioxins at the WGCP stack (data provided for c. January 2018 to December 2021) indicate that dioxins are below 0.05 ng/m^3 and therefore below the EPL limit of 0.3 ng/m^3 (as per EPL # L3.4 table of Air Concentration Limits for Pt 107) and the 0.1 ng/m^3 design target (as per EPL # L3.4, Note 2 b)). The status of the negotiations referred to in Note 2 c) was not reviewed within the scope of the IEA.		
L3.5	Water and/or Land Concentration Limits *NOTE: TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.* 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.	**Point 89 (Iron Making East Drain)** Monitoring results for Point 89 are recorded in the 'EHS Data Monitor Pro' web-based application (sighted). Monitoring results for Point 89 are also reported on the 'Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2021-nsw-monitoring-data/). Note: This typically only indicates that no sample was taken; however, this is consistent with the sampling requirements (refer to EPL # M2.5 & M2.6). As of 4 April 2022, this website was observed to include monthly reports for April 2012 to December 2021. BSL advised that data for 2022 had not been published yet as some results were still being analysed. There have been no reported dry weather discharges from Pt 89 since completion of the IMED Drainage Diversion Project (PRP 176) and raising the weir at the IMED in August 2017. Therefore, although there are no actual monitoring results for the pollutants at Pt 89 since the previous IEA in 2019; this is still compliant with this condition since the	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		limits only apply for dry weather discharges at Pt 89 (also refer to EPL # M2.5 & M2.6).		
L6	**Noise Limits**			
L6.2	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: 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.	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 2019. 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 24 February 2022. No noise complaints have been recorded since the previous IEA in 2019 (refer to Section 4.2.1).	**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 2019 (refer to EPL # L6.2).	**Not Triggered**	
OPERATING CONDITIONS				
O3	**Dust**			
O3.2	a) The licensee must develop and comply with the licensee's Environmental Management Manual "Fugitive Dust Management System" (FDMS), procedure MA-ENV-02-02 (dated 5 November 2019 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. 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	Dust emissions are required to be managed in accordance with the Fugitive Dust Management System (FDMS) (Divisional procedure MA-ENV-02-02, dated October 2019, copy provided), which requires additional controls on a case-by-case basis. Designated stockpile areas are nominated in the FDMS (Divisional procedure MA-ENV-02-02, dated October 2019, copy provided) and includes a list of dust control measures (e.g. stockpile sprays) (refer to EPL # O3.5). Video surveillance is provided at the control room and stockpile cameras are monitored by raw materials handling (separate control room).	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	443942, provided by the licensee to the EPA on 7 March 2018 and filed on EPA file DOC18/144556. c) The licensee must conduct monitoring at all sites and complete a regular survey of the nominated sites in accordance with the FDMS. d) For the purposes of the FDMS: i) Dust Emission Ranking (DER) is obtained by using the descriptions shown at table 7.2 and numbered photograph plates detailed in the FDMS. ii) Deleted. Follow-up Actions e) In the event that a DER 3 or greater, as set out in the FDMS, is observed then: i) Each such event must be reported in the licensee's incident reporting system, and ii) If the EPA requests, the licensee must demonstrate that measures were taken which complied with the FDMS to minimise those emissions. f) Nothing in this condition affects the responsibility of the licensee to comply with condition O1.1 and condition O2.1.	BSL advised that water carts and road sweepers are used (as observed during previous IEAs); however, these vehicles were not observed the site inspection on 24 February 2022 as it was raining heavily. c) Ambient dust monitoring is provided at Area 21. If receive a high wind alert, then will monitor via the cameras. Example weather alerts were sighted (emails dated 12 February 2022 and 20 February 2022, copies provided). d i) DER photograph plates are included in the FDMS. Note: d) ii) has been deleted from the current EPL. This previously specified that "No DER rating and reporting requirements apply when wind speeds exceed 25 knots (12.9 m/sec) measured on the licensed premises". The reporting requirements in the FDMS have been updated ("DER ratings do not apply for wind speed above 25 knots (46.4 km/h)" has been deleted in Section 5.2.1 of the FDMS). e) There were no Sinter Plant related self-reports to EPA with a DER of 3 or greater since the previous IEA in 2019 (refer to Section 4.2.1). However, there was an incident where a truck created dust at Area 21 with a DER of 3. The MARS record was sighted (i1899993, copy provided) as an example of BSL's incident reporting system. This included photographic evidence to confirm the DER.		
O3.5	MATERIAL STOCKPILES – DUST AND STORMWATER CONTROLS 1. Development of any new stockpiles (permanent, temporary or emergency) must be in accordance with the BSL Risk Assessment Process (MA-ENV-03-08). Note i. and ii.	Designated stockpile areas are nominated in the FDMS (Divisional procedure MA-ENV-02-02, dated October 2019, copy provided – Note: This was previously MA-ENG-ENV-03-08) and includes a list of dust control measures (e.g. stockpile sprays).	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	Note: 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") (EPA file DOC21/541873). 2. The EPA must be consulted prior to the establishment of any new permanent or temporary stockpiles: 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 Definitions – Stockpiles 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.			

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. Note: In complying with the above condition the licensee must aim to achieve an operational goal of 95% availability for the regenerator and the SRG Plant.	BSL track 'SRG availability' (i.e. availability of SRG for the Gypsum Plant) and a summary report (Excel spreadsheet) is submitted to the EPA (for discussion during 12 weekly meetings), which includes the status of the regenerator and SRG plant. An example report was sighted for November 2021 (copy provided). This includes the % availability of the SRG plant for January to October 2021. The % availability of the regenerator and Gypsum Plant is also tracked in an Excel Spreadsheet. The data for January 2020 to January 2022 shows the average availability of the regenerator when the Gypsum Plant was on (i.e. during SRG recovery) was c. 81%. This was discussed with the EPA representative, and it was acknowledged that the 95% level is a 'target' rather than a prescriptive limit. This has been assessed as an 'Compliant' since BSL appear to be attempting to operate the plant to ensure maximum *practicable* recovery, Gypsum production does not appear to be reducing (Based on Excel Spreadsheet of Weighbridge data from 01/02/2019 to 22/02/2022, copy provided) and BSL are self-reporting to the EPA when SRG recovery is not available (refer to Section 4.2.1).	**Compliant**	
O4.18	The Licensee must notify the EPA of any outage of the WGCP regenerator or SRG Plant that exceeds 7 days of sinter plant operations.	This condition has been changed since the previous IEA in 2019. The previous condition required notification of "any venting of sulfur rich gas (SRG) to atmosphere that exceeds 24 continuous hours". BSL has made self-reports to EPA when SRG recovery is not available (refer to Section 4.2.1). Note: Some of these self-reports relate to the older version of this condition and some relate to the current version of this condition.	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
O4.19	For any SRG Plant or regenerator outage exceeding 21 days, stack testing at Discharge Point 107, M2.2 requirements must be undertaken as follows: a) all parameters commencing on day 22 and then; b) weekly for SO2; c) every 3 weeks for all other parameters. Note 1: SO2 monitoring is not required per (a) and (b) above if SO2 is being monitored continuously by a CEMS. Note 2: EPA proposes to review the above condition in April 2023 in consultation with the licensee, against the suitability of the time periods, the resourcing required to collect this data, and the relevance to environmental performance.	There have not been any reported SRG Plant or regenerator outages exceeding 21 days since the previous IEA in 2019. BSL advised that outage duration is monitored by the Operations Engineer once the 7-day notification requirement is triggered (refer to EPL # O4.18); however, this does not appear to be a formalised in a procedure. This is to ensure the equipment is brought back online before reaching the 21-day limit specified in EPL # O4.19. BSL should establish a procedure or process to ensure stack testing at Discharge Point 107 is undertaken in accordance with EPL # O4.19 if an SRG Plant or regenerator outage exceeding 21 days (e.g. by adding a corrective action to undertake additional monitoring with a corresponding due date).	**Not Triggered**	**2022/07** - BSL should establish a procedure or process to ensure stack testing at Discharge Point 107 is undertaken in accordance with EPL # O4.19 if an SRG Plant or regenerator outage exceeding 21 days (e.g. by adding a corrective action to undertake additional monitoring with a corresponding due date).
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	All records required to be kept by the licence must be: 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.	Monitoring data is reported monthly on the 'Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2021-nsw-monitoring-data/). As of 4 April 2022, this website was observed to include monthly reports for April 2012 to December 2021. BSL advised that data for 2022 had not been published yet as some results were still being analysed. The 'EHS Data Monitor Pro' web-based application (sighted) can present the data graphically.	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		Example graphical data from 'EHS Data Monitor Pro' was provided for July 2018 to July 2019 for all monitoring undertaken at the WGCP stack (EPL Pt 107). 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).		
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: 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), and results are 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 in 'LIMS Solutions' (example sighted in LIMS for P02970-21 - Sinter Plant Point 2, sampled 20/10/21, copy not provided).	**Compliant**	
M2 Requirement to monitor concentration of pollutants discharged				
M2.1, M2.2 & M2.3	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: Air Monitoring Requirements *NOTE: TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.* 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.	**Point 2 (Sinter Machine Room Dedusting Stack) and Point 107 (Sinter Plant WGCP Exhaust Stack)** 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. Note: Continuous monitoring of opacity is required for Pt 2 and of total solid particles for Pt 151 (refer to EPL # M9.1). Monitoring data is reported monthly on the 'Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2021-nsw-monitoring-data/). As of 4 April 2022, this website was observed to include monthly reports for April 2012 to December 2021. BSL	**Non-Compliant**	**2022/08** - Only two of the quarterly monitoring results for Solid Particles at EPL Point 2 are reported on the 'Monitoring Data' page of the BSL website in 2019. The missing records should be uploaded to the website. **2022/09** - BSL has self-reported (as a non-compliance in the 2019, 2020 and 2021 Annual Returns) that some air monitoring analysis is not fully compliant with EPA approved

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	For the purposes of the table(s) above; a) Special Frequency 1 means "Quarterly in duplicate". b) Special Frequency 2 means "Yearly in duplicate". … g) Point 107 – The averaging period for SO2 and NOx for testing purposes is one hour. … Note: In situations where routine ambient air monitoring falls on a Public Holiday, the sampling event may be undertaken on the next regular business day. Note: The condition M2.2 monitoring requirements may be varied by the EPA in writing, following a written request from the licensee explaining the circumstances why a routine air monitoring event may not be undertaken.	advised that data for 2022 had not been published yet as some results were still being analysed. The data reported on the website generally complies with the requirements of this condition (Note: In many cases, the sample frequency is significantly higher than that required by this condition); however, the following exception was identified: • Only two of the quarterly monitoring results for Solid Particles at EPL Point 2 are reported on the 'Monitoring Data' page of the BSL website for 2019 (March and October). This has not been categorised as 'Non-Compliant' since the corresponding Annual Returns report that all four quarterly measurements were taken; however the records on the website should be updated accordingly. The 'EHS Data Monitor Pro' web-based application (sighted) can present data graphically. Example graphical data from 'EHS Data Monitor Pro' was provided for c. January 2018 to December 2021 for all monitoring undertaken at EPL Pt 107. BSL has self-reported (as a non-compliance in the 2019, 2020 and 2021 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). It is reported on the EPA website for EPL No. 6092 that the EPA has "requested additional information to progress BSL application to modify sampling methods". However, this non-compliance has continued to be reported in the past three annual returns and should be resolved for EPL Pt 2.		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. It is reported on the EPA website for EPL No. 6092 that the EPA has "requested additional information to progress BSL application to modify sampling methods". However, this non-compliance has continued to be reported in the past three annual returns and should be resolved for EPL Pt 2.

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
M2.5 & M2.6	Water and/or Land Monitoring Requirements *NOTE: TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.* For the purposes of the table(s) above: … f) 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. Note: In situations where routine water sampling falls on a Public Holiday, the sampling event may be undertaken on the next regular business day. Note: The condition M2.5 monitoring requirements may be varied by the EPA in writing, following a written request from the licensee explaining the circumstances why a routine water sampling event may not be undertaken.	**Point 89 (Iron Making East Drain)** 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/2021-nsw-monitoring-data/). Note: This typically only indicates that no sample was taken; however, this is consistent with the requirements of this condition (see below). As of 4 April 2022, this website was observed to include monthly reports for April 2012 to December 2021. BSL advised that data for 2022 had not been published yet as some results were still being analysed. There have been no reported dry weather discharges from Pt 89 since completion of the IMED Drainage Diversion Project (PRP 176) and raising the weir at the IMED in August 2017. Therefore, although there are no actual monitoring results for the pollutants at Pt 89 since the previous IEA in 2019; this is still compliant with Special Frequency 11, which only applies for dry weather discharges at Pt 89.	**Compliant**	
M3	**Testing methods - concentration limits**			
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or 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	Same as EPL # M3.1. It is reported in the 2019 IEA that evidence was sighted of an approval from the EPA to use CTM-13B (as BSL did not want to use method 8) and this approval was to apply until 2020 (or until such time as it is cancelled by the EPA). This related specifically to measuring the concentration of sulfuric acid mist and sulfur trioxide for reporting of sulfur oxide emissions. Conditional Test Method (CTM) 13B is now an approved alternative method in the updated NSW EPA approved method list (https://www.epa.nsw.gov.au/your-environment/air/industrial-emissions/sampling-analysing-	**Non-Compliant**	Refer to **2022/09**.

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	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. Note: The Protection of the Environment Operations (Clean Air) Regulation 2021 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".	air-emissions/approved-methods-sampling-analysing-air-pollutants); therefore, specific approval to use it is no longer required. BSL has self-reported (as a non-compliance in the 2019, 2020 and 2021 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'. It is reported on the EPA website for EPL No. 6092 that the EPA has "requested additional information to progress BSL application to modify sampling methods". However, this non-compliance has continued to be reported in the past three annual returns and should be resolved for EPL Pt 2.		
M3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	The NSW EPA has specified the approved methods for the sampling and analysis of water pollutants (https://www.epa.nsw.gov.au/your-environment/water/polices-guidelines-and-programs) BSL personnel advised that grab samples are collected for all licensed water discharges at Point 89 (as specified in EPL # M2.5) and that they were not aware of any requests to use other testing methods (not verified). EPA personnel also confirmed BSL's advice and no non-compliances are reported in the 2019, 2020 and 2021 Annual Returns for this condition. Although not possible to fully verify within the scope of the IEA, this condition has been categorised as 'Compliant'.	**Compliant**	

<table>
<tr><th>EPL #</th><th>Condition of EPL</th><th>Evidence and Finding/s</th><th>Compliance Assessment</th><th>Recommended Action/s</th></tr>
<tr><td colspan="5">M8 Requirement to monitor volume or mass</td></tr>
<tr><td>M8.1</td><td>For each discharge point or utilisation area specified below, the licensee must monitor:
a) the volume of liquids discharged to water or applied to the area;
b) the mass of solids applied to the area;
c) the mass of pollutants emitted to the air;
at the frequency and using the method and units of measure, specified below.
NOTE: TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.</td><td>Point 89 (Iron Making East Drain)
The requirement to daily monitor flow (kilolitres/day) is included in EPL # M8.1, which also lists the approved method for Point 89 (IMED) as a weir structure and level sensor.
The total flow is provided on the ‘Manly Hydraulics Laboratory’ online system. Data for 1-April-2019 to 23-February-2022 was sighted for the IMED. The max. recorded peak was observed to be 10,294 kl/day (c. August 2020).
There were four periods of discharge via Point 89: c. February 2020, c. July 2020, c. August 2020 and c. March 2021 (Exact dates not determinable from data provided).</td><td>Compliant</td><td></td></tr>
<tr><td>M8.2</td><td>POINT 107 – Sinter Plant Waste Gas Cleaning Plant Stack Mass Load Monitoring
The following pollutants shall have their mass load determined at Point 107:
<table>
<tr><th>Pollutant</th><th>Unit of Measure</th></tr>
<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>
</table></td><td>Point 107 (Sinter Plant WGCP Exhaust Stack)
Annual monitoring summary reports are included on the ‘Monitoring Data’ page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2021-nsw-monitoring-data/).
The annual monitoring summary reports for 2019, 2020 and 2021 include the mass loads in tonnes/annum for Point 107, as required by EPL # M8.2.</td><td>Compliant</td><td></td></tr>
</table>

<table>
<tr><th>EPL #</th><th>Condition of EPL</th><th>Evidence and Finding/s</th><th>Compliance Assessment</th><th>Recommended Action/s</th></tr>
<tr>
<td>M8.3</td>
<td>POINT 89 – Ironmaking East Drain Mass Load Monitoring
The following pollutants shall have their mass load determined at Point 89:
<table>
<tr><th>Pollutant</th><th>Unit of Measure</th></tr>
<tr><td>Total suspended solids</td><td>Tonnes/annum</td></tr>
<tr><td>Total zinc</td><td>Tonnes/annum</td></tr>
</table>
</td>
<td>Point 89 (Iron Making East Drain)
Annual monitoring summary reports are included on the ‘Monitoring Data’ page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2021-nsw-monitoring-data/).
The annual monitoring summary reports for 2019 and 2020 do not include the mass load information for Point 89; however, this may be due to the occurrence of short (< 1 day) duration emissions from the IMED during these reporting periods and sampling at Point 89 is only required ‘daily during a dry weather discharge’ (refer to EPL # M2.5 & M2.6). This was not verified with BSL during the IEA.
The annual monitoring summary report for 2021 includes the mass loads in tonnes/annum for Point 89 (i.e. presumably based on discharges that occurred c. July 2020, c. August 2020 and c. March 2021 – refer to EPL # M8.1). It is reported that this was based on ‘sampling conducted during wet weather discharges only’, with an annual load of 0.015 tonnes for Zinc and 1.51 tonnes for TSS.
This condition has been categorised as ‘Compliant’ based on the most recent annual monitoring summary report and the absence of non-compliances reported in the Annual Returns for this EPL condition; however, it is recommended that BSL consult with the EPA to determine if this condition is still applicable now that the IMED is unlikely to overflow under normal conditions and monitoring at Point 89 is normally only required ‘daily during a dry weather discharge’ (refer to EPL # M2.5 & M2.6).
Note: It is reported in the EPL that this condition originated from the SMERP (i.e. predates the IMED diversion project).</td>
<td>Compliant</td>
<td>2022/10 - It is recommended that BSL consult with the EPA to determine if EPL condition #M8.3 is still applicable for Point 89 now that the IMED is unlikely to overflow under normal conditions and monitoring at Point 89 is normally only required ‘daily during a dry weather discharge’ (refer to EPL # M2.5 & M2.6).
If EPL condition #M8.3 is retained, then sampling requirements should be clearly defined (e.g. sampling at Point 89 is required during dry and/or wet weather discharges to determine these mass loads).</td>
</tr>
</table>

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
M9	**Other monitoring and recording conditions**			
M9.1	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.	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. 12 months of continuous monitoring data is stored in CITECT (sighted) rather than being reported via 'EHS Data Monitor Pro'. BSL has implemented a new system, referred to as "OSIPI", for backing up data from CITECT, which has been implemented to back-up the data for the opacity meters (copy of spreadsheet data provided showing data for 2018 to current). BSL has not recorded any self-reports relating to a device being off-line since the previous IEA in 2019 (refer to Section 4.2.1). It is noted in a previous IEA report that self-reports have been made by BSL in the past when a device was off-line. 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). BSL advised that there have been some operability issues with the room dedusting opacity meter since the previous	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		IEA in 2019; however, unavailability has not reached 5% of the time. For example, the following is reported in the minutes of a meeting with the EPA (dated 9 February 2021, copy provided): "Electrical fault of opacity meter at RRDS stack in late Jan 2021. Fault has been repaired. Outage lasted approximately 8 days." Availability of instruments is also provided to the BSL Environment Department for inclusion in a quarterly maintenance compliance report (example 'Ore Preparation - Asset Maintenance/Development Quarterly Compliance Report', dated February 2022, and example 'Ore Preparations - SP & RM & Bulk Operations Quarterly Compliance Report, dated November 2021, copies provided), which specifically references this EPL condition. Availability is monitored quarterly (example email sighted showing quarterly monitoring of availability, copy not provided).		
M9.2	VIDEO RECORDING OF SITE AIR EMISISONS 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. *NOTE: TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.*	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 via the online ControlWare system and includes 3 months of recordings.	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
REPORTING CONDITIONS				
R4	**Other reporting conditions**			
R4.1	When the Annual Return is provided to the EPA, the licensee must also provide an 'Annual Monitoring Report'. Note: This report must provide the information that was previously provided quarterly under conditions R4, R4.1, R4.2 and R4.3. The 'Annual Monitoring Report' must be presented in a format agreed with the EPA and comprise: 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: 'O4.10 -BOS Roof Emissions', 'O4.13 BOS Kish Tipping', 'O4.14 Hot Metal Pouring', 'O4.17 - SRG Venting', and 'O4.19 Biosperse 485 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. f) data from any new source coal(s) used in the Pulverised Coal Injection (PCI) facility over the	This condition applies for the entire PKSW, so is not specifically applicable to the OPUP and WGCP (including Gypsum Plant). Therefore, the IEA only included a review of this EPL condition as it relates to the OPUP and WGCP (including Gypsum Plant). Note: Items (f) and (g) do not apply to the OPUP or WGCP (including Gypsum Plant). 'Licence Monitoring Data Annual Summary Reports' are provided on the 'Monitoring Data' page of the BSL website. Since the previous IEA in 2019, reports are available on the website for: 1 Jul 2018 to 30 Jun 2019; 1 Jul 2019 to 30 Jun 2020; and 1 Jul 2020 to 30 Jun 2021. b) includes a cross-reference to 'O4.17 - SRG Venting'. This appears to be an error and should be a reference to EPL Condition # O4.16 (Note: it appears that this cross-reference was not corrected when a condition was deleted for an update to the EPL on 12 January 2017). EPL # O4.16 is as follows: *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/Nm^3 for particulate matter.* *Note: Normal operation excludes the first two hours of operation following start up.* Note: The data required for EPL # O4.16 is not included in the 'Licence Monitoring Data Annual Summary Reports'	**Compliant**	**2022/11** – EPL Condition # R4.1 part b) includes a cross-reference to 'O4.17 - SRG Venting'. This appears to be an error and should be a reference to EPL Condition # O4.16 (Note: it appears that this cross-reference was not corrected when a condition was deleted for an update to the EPL on 12 January 2017). **2022/12** – BSL would appear to be compliant with the intent of EPL Condition # R4.1 based on submission of the Annual Returns (refer to CC # W-A3.1) and the quarterly monitoring reports (i.e. reports for Jan, Apr, Jul and Oct) on the 'Monitoring Data' page of the BSL website; however, the monitoring data for particulate matter at Point 107 should be included in the 'Annual Monitoring Report' as required under part b).

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	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). g) For Lime Slurry Diverted to Alliance and Recycling Lime Pits: 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. ii) The information must include a graph showing a comparison of the previous years.	provided on the 'Monitoring Data' page of the BSL website; however, compliance with the 20 mg/Nm^3 limit for particulate matter is included in the quarterly monitoring reports (i.e. reports for Jan, Apr, Jul and Oct) on the 'Monitoring Data' page of the BSL website and concentration monitoring data for Point 107 is included in Section B2 'Concentration Monitoring Summary' in the Annual Returns (examples provided for 2019, 2020 and 2021). BSL would appear to be compliant with the intent of this condition based on submission of the Annual Returns (refer to CC # W-A3.1) and the quarterly monitoring reports (i.e. reports for Jan, Apr, Jul and Oct) on the 'Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2021-nsw-monitoring-data/); however, the monitoring data for particulate matter at Point 107 should be included in the 'Annual Monitoring Report' as required under part b).		

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
R4.2	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. Note: In establishing the web site, the licensee should consider the publishing requirements listed in EPA Requirements For Publishing Pollution Monitoring Data.	Monitoring data is accessible via the 'BlueScope Port Kembla Steelworks Ambient Monitoring Data Portal' (sighted) at: https://piinthesky.gtsgroup.com.au/Bluescope. The reported hourly average data includes: PM10 (ug/m^3), Wind Speed (km/hr) and Wind Direction (deg.). 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 being 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). The minutes of the EPA liaison meeting on 9-Jun-16 (copy provided) confirm that real time monitoring was available from 1-Jun-16.	**Compliant**	
R4.3	Ambient Air Monitoring Network Report 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: a) summarised or graphically presented ambient air quality monitoring results assessed against relevant air quality standards and criteria; b) comparison of licensee air quality data against other air quality data (e.g. OEH stations / ANSTO monitoring); c) presentation of long-term trends; d) a narrative of a-c above, and e) a quality assurance statement.	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.	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
R4.4	a) By 1 December 2016 the licensee must submit a review of the Ambient Air Monitoring Network. 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. ii) In reviewing the pollutants monitored the process must include but may not be limited to: a. the inclusion of PM2.5 and sulphur oxides into the network; 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 c. other monitoring undertaken in the Port Kembla area (including e.g. ANSTO, Dustrak, OEH monitoring station). 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.	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). It is reported in the Independent Peer Review report that the review included a detailed review of the following documentation: • *140508 Ambient Risk Assessment Submission.pdf* • *160829 R4.3 Ambient Monitoring Annual Report 15~16.pdf* • *161201 R4.4 Ambient Air Monitoring Network Review Report.pdf* • *170829 R4.3 Ambient Monitoring Annual Report 16~17.pdf* • *180829 R4.3 Ambient Monitoring Annual Report 17~18.pdf* The independent peer review appears to have addressed items (i) and (ii). It is reported in the Independent Peer Review report that: • *Review of the network appears appropriate, and no additional frequency is considered advantageous.*	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		• *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.*		
R4.5	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.	There are no records of abnormal colour changes being self-reported to the EPA since the previous IEA in 2019 (refer to Section 4.2.1). Such an emission would only potentially arise due to overflow of the IMED. The IMED Drainage Diversion Project (PRP 176) was completed in August 2017. As a result, the IMED does not normally discharge to the harbour under dry weather conditions. No visible discolouration of the harbour was evident during the site inspection on 24 February 2022 (Note: The IMED was not discharging to the harbour at this time).	**Compliant**	
SPECIAL CONDITIONS				
E5	**Sinter Machine Short Term Bypass Arrangements**			
E5.1	Background 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:	EPL # E5.1 is a background note for EPL # E5.2 to E5.10 (See below for findings and compliance assessment). The conditions listed in Section E5 of the current EPL were added after the WGCP stack fire in 2014. These conditions have been triggered since the previous IEA in 2019 (refer to EPL # E5.3).	Refer to EPL # E5.2 to E5.10	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	(a) for a proactive response to plant control data/indicators or emergency shutdown; or (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.	Two WGCP bypasses have occurred since the previous IEA in 2019; one in 2020 and another in 2021. Both bypasses were for approved preventative maintenance; therefore, items 1 and 2 of EPL # 5.3 have not been triggered since the previous IEA in 2019. BSL notified the EPA of the planned bypasses in 2020 (letter dated 27 September 2019, copy provided) and 2021 (letter dated 14 May 2021, copy provided), which were both approved by the EPA (letters dated 6 December 2012 and 3 June 2021, copies provided).	**Not Triggered (EPL #5.3, Pt 1 and Pt 2)** **Compliant (EPL #5.3, Pt 3)**	
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. *NOTE TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.* For each monitoring/discharge point or utilisation area specified in the table\s 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.	**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/2021-nsw-monitoring-data/).	**Non-Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	NOTE TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information. Note: 1. The combined emissions of air impurities from point 151 must be determined in accordance with TM-38, calculated using data collected concurrently at sampling locations 3A and 3B. 2. The Dioxins and Furans sampling time must be the longer of either 2 hours or the time required to achieve a method detection limit of 0.02 ng/m3.	The website was observed to include the following data for Point 151 for the planned bypasses in 2020 and 2021: • 'SINTER MACHINE INTERIM OPERATIONAL ARRANGEMENTS AIR QUALITY DATA' for 18 February to 02 May 2020. This report notes exceedance of the EPL concentration limit for dioxins and furans at Point 151 (refer to Section 4.2.1). The NSW EPA issued two penalty notices (Notice Numbers: 1597434 and 1597435, Issue date: 22 July 2020) due to these exceedances during the 2020 bypass (refer to Section 4.3.1). • 'SINTER MACHINE INTERIM OPERATIONAL ARRANGEMENTS AIR QUALITY DATA' for 21 June to 24 June 2021. This report does not identify any exceedance of an EPL limit at Point 151 during the 2021 bypass. Monitoring results for Point 151 are also recorded in the 'EHS Data Monitor Pro' web-based application. BSL advised that Note 1 was added to the EPL because it is now possible to also sample at location 3B (prior to 2021 most were sampled at location 3A). With respect to Note 2, sampling data from LIMS for June 2021 shows the duration of sampling is > 2 hrs. BSL advised that they are confident that 2 hrs is sufficient to achieve the limit based on extensive sampling to date (not verified). This condition has been assessed as 'Non-Compliant' due to exceedance of the concentration limit for dioxins and furans at Point 151 (No. 3 Sinter Machine Stack) during the 2020 bypass.		
E5.6	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)	Monitoring results for Point 151 are reported on the 'Monitoring Data' page of the BSL website for the bypasses in 2021 and 2020 (also refer to EPL # E5.5). BSL advised that	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	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: *NOTE TABLE HAS NOT BEEN REPRODUCED IN THIS REPORT – Refer to EPL for further information.* Note: 1. Special Frequency 12 means "Daily at the commencement of the bypass and one sample every 2 days following confirmation that the first 3 daily sample results are less than the licence limit." 2. Due to the increased Dioxin and Furan monitoring frequency, non-isokinetic testing of the following gases using the specified methods is approved for the June 2021 bypass: a) Hydrogen Chloride and Hydrogen Fluoride - USEPA Method 26 or equivalent. b) Sulfur Dioxide and Sulfuric Acid Mist and Sulfur Trioxide (as SO3) - USEPA Conditional Test Method 13 (USEPA Method 8A) or 13A or equivalent. 3. Continuous monitoring of Solid Particles is required under this licence as listed in the table above. The results of this monitoring are not required for compliance assessment purposes. The results of this monitoring are used by the licensee for operational control purposes. 4. Type 1 substance means the elements antimony, arsenic, cadmium, lead or mercury or any compound containing one or more of those elements. 5. Type 2 substance means the elements beryllium, chromium, cobalt, manganese, nickel, selenium, tin or vanadium or any compound containing one or more of those elements.	the report for the 2021 bypass was updated as results were received, and that the EPA requested the raw data (not verified). Sampling frequency for most of the listed pollutants is 'daily during testing' or 'weekly'. Continuous monitoring is only specified for solid particles for operational control purposes (as per Note 3). The sampling frequency for all pollutants was the same during the 2020 and 2021 bypasses, with the exception of dioxins and furans. For the 2020 bypass, the frequency was 'weekly', but this was changed as per Note 1 prior to the 2021 bypass. Continuous monitoring results for Solid Particles at Point 151 are reported on the 'Monitoring Data' page of the BSL website for the 2020 and 2021 bypasses: • An Excel spreadsheet showing the recorded Solid Particles (mg/m^3) monitoring results at the No 3 Sinter Machine Stack 3A Duct for 21/02/2020 22:30 to 2/05/2020 19:00 and 3B duct for 21/02/2020 22:30 to 29/04/2020 2:00. • An Excel spreadsheet showing the recorded Solid Particles (mg/m^3) monitoring results at the No 3 Sinter Machine Stack (Point 151) for 19/06/2021 11:00 to 25/06/2021 2:00. BSL advised that these results were posted on the website on every working day (not verified). Monitoring undertaken during the bypasses appears to have complied with the monitoring requirements. In some cases, the sample frequency significantly exceeded the frequency specified in this condition.		

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	6. Limits for Type 1 and Type 2 substances are specified in the Protection of the Environment Operations (Clean Air) Regulation 2021.			
E5.7	Operation 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: a) 28 days for a proactive response or emergency shutdown; and b) 10 weeks for any preventative maintenance.	BSL notified the EPA of the planned bypasses in 2020 (letter dated 27 September 2019, copy provided) and 2021 (letter dated 14 May 2021, copy provided), which were both approved by the EPA (letters dated 6 December 2012 and 3 June 2021, copies provided). The bypass in 2020 was scheduled for 12 weeks and was completed in c. 74 days (refer to EPL # 5.10). The bypass in 2021 was scheduled for 3 weeks and was completed in c. 4.8 days (refer to EPL # 5.10). This has been categorised as 'Compliant' since each bypass was completed in less than the scheduled time specified in each notification.	**Compliant**	
E5.8	Duty to Minimise or Prevent Air Pollution 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: 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.	BSL notified the EPA of the planned bypasses in 2020 (letter dated 27 September 2019, copy provided) and 2021 (letter dated 14 May 2021, copy provided). EPA requested additional information for the 2020 bypass, which included reference to the requirements of this EPL condition (letter dated 21 October 2019). BSL subsequently provided additional information to the EPA (letter dated 24 October 2019), which outlined measures such as managing feed materials and maintaining equipment. BSL's notification for the 2021 bypass outlined measures proposed to prevent an exceedance of the dioxins and furans concentration limit based on the findings of the investigations following the exceedance during the bypass in 2020 (refer to EPL # E5.4 & E5.5). This included adjusting and testing the ore blend prior to the 2021 bypass to provide additional evidence that the concentration in the	**Non-Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		waste gas could be minimised through the proposed alteration of the ore blend. This has been categorised as 'Non-Compliant' due to exceedance of the concentration limit for dioxins and furans at Point 151 (No. 3 Sinter Machine Stack) during the bypass in 2020 – Refer to EPL # E5.4 & E5.5.		
E5.9	Timely Public Access to Air Quality Data 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: (a) In stack at point 151. (b) Ambient air quality. This service must be developed in consultation with the EPA.	Monitoring data is reported on the 'NSW Monitoring Data' page of the BSL website (https://www.bluescopeillawarra.com.au/environment/reporting-on-performance/2021-nsw-monitoring-data/). The website was observed to include: • 'SINTER MACHINE INTERIM OPERATIONAL ARRANGEMENTS AIR QUALITY DATA' for 18 February to 02 May 2020. This report includes a hyperlink to the online monitoring data for PM10 (https://piinthesky.gtsgroup.com.au/Bluescope) and notes exceedance of the EPL concentration limit for dioxins and furans at Point 151. • An Excel spreadsheet showing the recorded Solid Particles (mg/m^3) monitoring results at the No 3 Sinter Machine Stack 3A Duct for 21/02/2020 22:30 to 2/05/2020 19:00 and 3B duct for 21/02/2020 22:30 to 29/04/2020 2:00. The max. readings were 25 mg/m^3.for 3A and 28 mg/m^3.for 3B. • 'SINTER MACHINE INTERIM OPERATIONAL ARRANGEMENTS AIR QUALITY DATA' for 21 June to 24 June 2021. This report includes a hyperlink to the online monitoring data for PM10 (https://piinthesky.gtsgroup.com.au/Bluescope).	**Compliant**	

<table>
<tr><th>EPL #</th><th>Condition of EPL</th><th>Evidence and Finding/s</th><th>Compliance Assessment</th><th>Recommended Action/s</th></tr>
<tr><td></td><td></td><td>• An Excel spreadsheet showing the recorded Solid Particles (mg/m^3) monitoring results at the No 3 Sinter Machine Stack (Point 151) for 19/06/2021 11:00 to 25/06/2021 2:00. The max. reading was 16 mg/m^3.</td><td></td><td></td></tr>
<tr><td>E5.10</td><td>Requirement to record bypasses of the WGCP
The licensee must record the following details in relation to each bypass of the WGCP and provide the information to the EPA upon request:
a) The reason for the bypass;
b) The start time and date; and
c) The finish time and date.</td><td>BSL notified the EPA of the planned bypasses in 2020 (letter dated 27 September 2019, copy provided) and 2021 (letter dated 14 May 2021, copy provided). These notifications included the information required by items a) and b) (Note: only start date is specified) and c) (Note: duration is specified rather than finish date).
Although start and finish times were not specified in the notifications, this has been marked a ’Compliant’ since both bypasses were approved by the EPA (letters dated 6 December 2012 and 3 June 2021, copies provided) and the following additional data was provided by BSL for the IEA (emails dated 2 and 9 July 2021, copies provided):
<table><tr><td>Start of Bypass Condition</td><td>18/02/2020 7:25</td><td>19/6/2021 08:26</td></tr><tr><td>End of Bypass Condition</td><td>2/05/2020 18:19</td><td>24/6/2021 02:24</td></tr><tr><td>Bypass Duration (days)</td><td>74.45</td><td>4.75</td></tr><tr><td>Bypass Duration (hours)</td><td>1786.9</td><td>114</td></tr></table></td><td>Compliant</td><td></td></tr>
<tr><td>E5.11</td><td>Review of Air Emissions Model
Background</td><td>The report submitted to EPA in 2021 was sighted (dated 26 Feb 2021, copy not provided). Evidence of its submission to EPA as also sighted (copy not provided).</td><td>Compliant</td><td></td></tr>
</table>

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	The current site emissions model was developed by ENVIRON over the period from 2008 to 2011. The model, methods and consultants were approved by the EPA and the work undertaken successfully as part of PRP 131. Having a standard approved model has allowed consistent assessment over time of changes in air emissions and impacts associated with operational changes and incidents. The current model allows any combination of plant to be modelled, including 6 Blast Furnace and other plant that has been shut down. New plant can simply be added. Following the recent use of the model during the 2020 Sinter Plant Bypass, the EPA has highlighted the possible need for some updates, including current plant configuration, supporting data, and generation of model outputs consistent with contemporary guidelines and criteria. **Aim** To review the existing BSL Air Emissions Site Wide Model. **Requirements** 1 The licensee must undertake a review of the Air Emissions Site Wide Model and identify all updates required to be made to the model to ensure; a) all point and fugitive emission sources are reflective of the current operations b) the emissions inventory is reflective of contemporary emissions data c) any adopted emission factors are current and consistent with industry standard the background air quality data is based on contemporary ambient air monitoring data	BSL advised that they are now working with consultants to update the model (to use CALPUFF). Emission factors have been updated for some stacks and some (more recent) meteorological data is to be used. BSL advised EPA of the "peer review undertaken by ERM Australia Pacific Pty Ltd (ERM) in February 2021" (letter to EPA dated 30 December 2021, copy provided).		

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	d) the simulated production scenarios are reflective of current and likely future operations e) the adopted meteorologic data is both spatially and temporally representative f) all nearby sensitive receivers have been considered The report must incorporate a peer review by a suitably qualified and experienced professional that has been approved by the EPA. Following submission of this report, the EPA will discuss the model update timing with the licensee All assessment procedures and must be consistent with the EPA's Approved Method for the Modelling and Assessment of Air Pollutants in NSW (2017) **Due Date**: 26 February 2021 Note: BlueScope plans to update the air emissions model as part of the No 6 Reline project. This update is currently expected to occur in late 2021.			
E5.12	**Feasibility Assessment for Continuous Emissions Monitoring System (CEMS) (Sulfur Dioxide)** **Background** In spite of ongoing efforts by BSL, the Sulfur Rich Gas (SRG) plant continues to experience significant down times. SRG availability was around 80% in 2018 and 60% for 2019. While this has not presented an emissions limit compliance issue, it does increase emissions of sulfur oxides. The current licence quarterly stack testing provides limited information on emissions rates, particularly on any short term changes in SO2 emissions when the SRG plant is on or off line. Other real time monitoring systems installed following the fire in 2014 has	The 'Methodology for Feasibility Assessment for Continuous Emissions Monitoring Systems (Sulfur Dioxide)' has been submitted to EPA (dated 28 October 2021, copy provided). The EPA has "reviewed the proposal and is satisfied with the proposed methodology" (letter dated 2/11/2021, copy provided).	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	proven useful in tracking plant performance and adjusting operating parameters. Additionally if the WGCP regenerator is off line, real time sulfur dioxide (SO2) monitoring may provide additional, real time information on the condition of the WGCP char. An SO2 CEMS system was investigated and trialled at the sinter plant some time ago. EPA believes there is value in reassessing the feasibility of implementing continuous emissions SO2 monitoring to account for these changes in emissions in real time, and thus will require a feasibility assessment. **Aim** To undertake a feasibility assessment for implementing a continuous method for measuring sulfur dioxide (SO2) emissions from the Sinter Plant Waste Gas Cleaning Plant Stack. **Requirements** 1. The licensee must prepare and submit a feasibility study report which assesses the feasibility of installing and operating a monitoring system capable of measuring sulfur dioxide (SO2) emissions on the outlet of the Sinter Plant Waste Gas Cleaning Plant Stack on a continuous basis. The proposed system must be capable of being correlated against a reference method in accordance with US EPA Performance Specification 2. As a minimum, the report must: a) be prepared in consultation with a suitably qualified and experienced air monitoring practitioner who has demonstrated experience in the installation and			

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	operation of SO2 monitoring systems at large industrial plant; b) include a statement about the general feasibility of installing a SO2 CEMS; c) evaluate potential monitoring options based on site specific factors including, but not limited to: i. process and stack conditions, ii. sulfur dioxide concentration range, and iii. reliability and life cycle cost. d) evaluate potential installation locations capable of achieving a representative measurement. 2. By 30 October 2021 the licensee must submit to the EPA a proposed methodology for undertaking the feasibility assessment of continuous SO2 monitoring at EPL Point 107 as required under 1 above. The proposed methodology must generate a prioritised feasibility ranking of the measurement options. **Due Date: 30 October 2021**			
E5.13	The licensee must undertake the feasibility assessment per the approved methodology and submit a report of the assessment findings to the EPA by the due date below. Where it is considered not feasible to install a SO2 CEMS, the Report must: a) provide a detailed explanation and robust justification of why installation and operation of an SO2 CEMS is not feasible; and b) detail proposed alternative monitoring and reporting options that ensure ongoing representativeness of SO2 emission monitoring and reporting at the premises. Alternative options must have suitable	The 'Methodology for Feasibility Assessment for Continuous Emissions Monitoring Systems (Sulfur Dioxide)' has been submitted to EPA (dated 28 October 2021, copy provided). The EPA has "reviewed the proposal and is satisfied with the proposed methodology" (letter dated 2/11/2021, copy provided). BSL advised that this is to be covered by a six-month trial using existing equipment.	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	temporal resolution to ensure all significant emission variability is accounted for. Note: Following submission of the report EPA will meet with the licensee to discuss the findings and possible installation of a monitor or monitoring system. **Due Date: 1 March 2022**			
E7	**Sinter Plant Waste Reuse Trials**			
E7.1	**Background** 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. **Requirements** Unless otherwise agreed in writing by the EPA, the licensee must comply with the following conditions.	EPL # E7.1 is an explanatory note for EPL # E7.2 to E7.7 (see below for findings and compliance assessment). Note: BSL advised that two re-use trials were completed prior to the previous IEA in 2019 and that recycling of ACU is still under investigation. BSL also advised that there have been no further trials since the previous IEA in 2019.	Refer to EPL # E7.2 to E7.7	
E7.2	The licensee must submit an ACU trial proposal and obtain approval in writing from the EPA prior to commencing the trial.	It is reported in the 2019 IEA report that "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."	**Compliant**	
E7.3	The licensee must undertake the trial as outlined in the Proposal unless otherwise agreed in writing by the EPA.	Both trials were completed prior to the IEA; therefore, it was not possible to fully verify compliance with this condition. However, it is reported in the 2019 IEA report that "the EPA has responded positively (letter dated 8-Nov-17, copy provided) to BSL's report for the first trial (dated Jul-17, copy	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
		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."		
E7.4	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*.	Both trials were completed prior to the IEA; therefore, it was not possible to fully verify compliance with this condition. However, it is reported in the 2019 IEA report that "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)."	**Compliant**	
E7.5	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.	Both trials were completed prior to the IEA; therefore, it was not possible to fully verify compliance with this condition. However, it is reported in the 2019 IEA report that "the ACU and precipitator dust generated during the 2nd trial was observed during the site inspection on 1 March 2019."	**Compliant**	
E7.6	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: 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;	It is reported in the 2019 IEA report that "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."	**Compliant**	

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
	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.			

EPL #	Condition of EPL	Evidence and Finding/s	Compliance Assessment	Recommended Action/s
E7.7	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: 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.	Both trials were completed prior to the IEA; therefore, it was not possible to fully verify compliance with this condition. However, it is reported in the 2019 IEA report that "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)."	**Compliant**	

B.3 Site and Equipment Inspections

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

Some controls listed in the Environmental Aspects and Impacts Register were spot-checked during the site inspection (e.g. bunding, IMED weir, spill kits, waste management, etc.).

Table 13 Audit Findings (Site and Equipment Inspections – 24 February 2022)

ID #	Evidence and Finding/s	Recommended Action/s
1	During the site inspection on 24 February 2022, the drains, gutters, access ways and roadways were observed to be mostly free of sediment and any other material, particularly in the vicinity of the WGCP and the Gypsum Plant. Significant build-up and drag out of dust was observed outside the northern end of the Sinter Plant (refer to Photograph 9). This area should be cleaned to minimise drag out and potential discharge of these dusts to the site drainage system. Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED Drainage Diversion Project (PRP 176) was completed in August 2017. As a result, the IMED does not normally discharge to the harbour under dry weather conditions and significantly reduces the likelihood of any particulates or debris being discharged off-site with surface water runoff. **Photograph 9 Example Roadways at Sinter Plant (24 February 2022)** 	**2022/13** - Significant build up and drag out of dust was observed outside the northern end of the Sinter Plant (refer to Photograph 9). This area should be cleaned to minimise drag out and potential discharge of these dusts to the site drainage system.

ID #	Evidence and Finding/s	Recommended Action/s
	  **Photograph 10 Example Roadways at WGCP (24 February 2022)**  	

ID #	Evidence and Finding/s	Recommended Action/s
	Photograph 11 Example Roadways at Gypsum Plant (24 February 2022) 	

ID #	Evidence and Finding/s	Recommended Action/s
2	Small amounts of loose char were observed on the ground at the WGCP (refer to Photograph 12 and Photograph 14). Note: Site drains discharge to the 4BF Thickener and then to the IMED. The IMED Drainage Diversion Project (PRP 176) was completed in August 2017. As a result, the IMED does not normally discharge to the harbour under dry weather conditions and significantly reduces the likelihood of any particulates or debris being discharged off-site with surface water runoff. **Photograph 12 Char on Ground at WGCP (24 February 2022)**  	**2022/14** - Small amounts of loose char were observed on the ground at the WGCP (refer to Photograph 12 and Photograph 14). These char spillages should be cleaned up.

ID #	Evidence and Finding/s	Recommended Action/s
3	Example bunding is shown in Photograph 13. Most was observed to be clean of material and the bund for the Sodium Hydroxide tank has been cleaned / recoated since the previous IEA. The bund for unloading Sodium Hydroxide was observed to contain some sediments / debris and should be cleaned. **Photograph 13 Example Bunding (24 February 2022)** Water Treatment Area at WGCP  NaOH Storage 	**2022/15** – The bund for the Sodium Hydroxide unloading area should be cleaned of all sediments and debris (refer to Photograph 13).

ID #	Evidence and Finding/s	Recommended Action/s
	Water Treatment Area at WGCP  Sodium Hydroxide Unloading Area 	

ID #	Evidence and Finding/s	Recommended Action/s
4	An example procedure was sighted for cleaning the heat exchanger for the WGCP regenerator fans (dated 03.08.2021, copy provided). This includes measures to minimise potential impacts of a spillage, such as: bunding the area with sandbags (refer to Photograph 14); lining the sump with plastic as a catchpoint for run-off and for a vac-truck to recover any wastewater; vacuuming of any and all loose material e.g. Char, dust etc. from tube bundles; etc. **Photograph 14 Example Use of Sandbags at WGCP (24 February 2022)** 	

ID #	Evidence and Finding/s	Recommended Action/s
5	Some isolated examples of dust build up were observed on or near equipment at the Sinter Plant; however, these were generally inside buildings and subject to periodic clean-up work orders. **Photograph 15 Dust Build up at Sinter Plant Building (24 February 2022)**  	

ID #	Evidence and Finding/s	Recommended Action/s
	 	

ID #	Evidence and Finding/s	Recommended Action/s
6	Cleanaway waste observed to be removing liquid waste at the Sinter Plant. **Photograph 16 Cleanaway Removing Liquid Waste (24 February 2022)**  	

ID #	Evidence and Finding/s	Recommended Action/s
7	Segregation of waste materials into dedicated waste storage skips was observed on site during the site inspections on 24 February 2022 (refer to CC # O-2.13). However, in one instance, mixed waste was observed in a bin marked for dry industrial waste. **Photograph 17 Bin for Dry Industrial Waste (24 February 2022)**  	**2022/16** – It should be ensured that the bin marked for 'dry industrial waste' at the WGCP is not used for other waste materials (refer to Photograph 17).

ID #	Evidence and Finding/s	Recommended Action/s
8	The liquid level in the IMED was observed to be at a relatively high level following recent periods of high rainfall. **Photograph 18 IMED (24 February 2022)** IMED  IMED Weir 	

ID #	Evidence and Finding/s	Recommended Action/s
9	There were no visible emissions from any of the stacks during the site inspection. **Photograph 19 WGCP and No.3 Sinter Machine Stacks (22 February 2022)** WGCP Stack (Pt 107)  No.3 Sinter Machine Stack (Pt 151) 	

ID #	Evidence and Finding/s	Recommended Action/s
4	Storage of ACU and EP dust was observed at the stockpile area. No visible dust emissions were observed during a truck delivery (refer to Photograph 20). **Photograph 20 ACU and EP Dust at Stockpile Area (24 February 2022)**   	

Appendix C Planning Secretary Audit Team Agreement

NSW GOVERNMENT | Planning, Industry & Environment

Mr Richard Lorenc
Ore Preparation Manager
BlueScope Steel (AIS) Pty Ltd
Five Islands Road
PORT KEMBLA NSW 2505

08/12/2021

Dear Mr Lorenc

Waste Gas Cleaning Plant (DA No 26-02-01)
Sinter Plant Ore Preparations Upgrade Project (MP 06_0229)
Independent Auditor 2021

I refer to your letter of 16 November 2021 seeking approval of Mr Philip Skinner of Arriscar Pty Limited as the lead auditor for the upcoming Independent Environmental Audit of Waste Gas Cleaning Plant and the Sinter Plant Ore Preparations Upgrade Project (the projects), in accordance with Schedule 2, Condition 7.6 of development consent DA 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 projects.

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. Auditors may wish to have regard to the Independent Audit Guideline dated May 2020. A copy of this guideline can be located at https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf.

The audit report is to include the following:

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

Within two months of the commissioning of 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 approval condition.

Should you need to discuss the above, please contact Georgia Dragicevic, Senior Compliance Officer, on (02) 4247 1852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely

Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

Appendix D Independent Audit Declaration Form

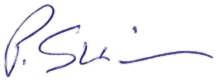
Project Name	Sinter Machine Emission Reduction Project (SMERP) including Waste Gas Cleaning Plant (WGCP); Gypsum Plant; and, Ore Preparation Upgrade Project (OPUP)
Consent Number	DA No 26-02-01, MOD-50-4-2005-I and MOD 2; and DA No 06-0229, MOD 1.
Description of Project	Sinter Plant, Waste Gas Cleaning 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	20 April 2022

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:

i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
ii. the findings of the audit are reported truthfully, accurately and completely;
iii. I have exercised due diligence and professional judgement in conducting the audit;
iv. I have acted professionally, objectively and in an unbiased manner;
v. 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;
vi. 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;
vii. 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
viii. 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	Arriscar Pty Limited
Company Address	Level 26, 44 Market Street, Sydney NSW 2000