

IEA REPORT FINDINGS, RESPONSE – DEC 2019

1. 2019 Independent Environmental Audit – DA35/98, Mod 5

a. Audit conducted by AECOM, Oct 2019

b. 3 non-conformances and 16 OFIs

Non-Conformances

Conditions	Condition Details	Audit Results	Corrective Actions
15	The Applicant shall endeavour to enter into contractual arrangements with transport companies to require their trucks to use the routes determined under the Transport Management Plan.	<p>Inadequate detail included in the Traffic Management Plan with regards to the requirements to ensure trucks use the routes outlined in the plan, as required by Condition 15 of DA 35/98</p> <p>The TMP outlines specific requirements for traffic movement onsite at the CAP. The plan however does not discuss the requirement for vehicles to predominantly use the main arterial roads. The auditors did not sight evidence to verify that IXOM had endeavoured to enter into contractual arrangements with transport companies regarding the predetermines access routes outlined in the TMP.</p>	<p>Include reference to the requirements of Condition 15 in the Traffic Management Plan. Specific mention should be made to the allocated entry to the site, via the main arterial roads.</p> <p>Endeavour to enter into contractual arrangements with transport companies to require their trucks to use the routes outlined in the Traffic Management Plan.</p> <p>Done</p>
21	<p>(a) Excavated material shall be screened, tested and disposed of in accordance with the Department of Education, Climate Change and Water's Waste Classification Guidelines 2008. Testing shall include, but not be limited to, mercury and hexachlorobenzene. (b) Materials found to be contaminated shall be disposed of to an appropriately</p>	<p>The management of contaminated material during the excavation process of MOD 5. Material was managed in accordance with the MOD 5 Construction Environmental Management Plan however was not compliant with Condition 21 of DA 35/98.</p>	<p>Contradiction of condition in DA35/98 and the Repack CEMP. Mod 5 and CEMP were both reviewed and approved by DPIE before commencement.</p> <p>Consider removing / rewording this Condition in the next Modification to the Development Consent.</p> <p>Make a prompt in the Compliance Matrix as a reminder.</p>

	licensed facility and not reused on site for any purpose.		
35	No later than one month prior to the start of operation, the Applicant shall prepare to the satisfaction of the EPA, a Noise Management Plan to address operating the proposed development in accordance with the Site Noise Reduction Program.	Evidence that the noise management plan was approved by the EPA was not provided, as required by Condition 35 of DA 35/98	<p>Seek approval of the noise management plan from the EPA. Submit to EPA after the EMP has been updated with the Noise Management Plan.</p> <p>Noise Mgt plan has been revised in the EMP. It has been submitted previously and will be resubmitted to the EPA for approval.</p> <p>Due: 30 July 2020</p>

Opportunities for Improvements

Conditions	Condition Details	Audit results	Corrective Actions
Site Inspection Photo 4-1	2019 IEA OFI 001	Consider options for reducing the impacts of spills / leaks from pipelines to land. This could include systematically replacing sections beneath the pipelines with hard stand on a risk-based approach.	Explore options Consider putting in a capital project. Will consider implementing impervious barrier to prevent contamination to soil Due: Apr 2021
Site Inspection Photo 4-8	2019 IEA OFI 002	Improve housekeeping to prevent iron chips from entering stormwater drain	Done. Included in the daily checks to ensure good housekeeping.
DA 35/98 Condition 19, Environmental Management Plan	2019 IEA OFI 003	Include a brief discussion of the Development Consent and each of the Modifications 1-5 and what they approve in Section 3.2.	Update EMP to reflect OFIs Done
	2019 IEA OFI 004	Include the requirements of the relevant Development Consent Conditions to each significant environmental aspect and discuss how they will be addressed.	Update EMP to reflect OFIs Done
	2019 IEA OFI 005	Include the Work Health and Safety Act 2011 and the relevant requirements (in particular relating to Major Hazard Facility Licence and Dangerous Goods Notification) to Table 1 General Requirements Register	Update EMP to reflect OFIs Done
	2019 IEA OFI 006	Include the NGER Act and relevant requirements to Table 1 General Requirements Register	Update EMP to reflect OFIs Done
	2019 IEA OFI 007	Consider including energy use as a significant environmental aspect and including specific discussion of how the Botany CAP is managing this aspect.	Update EMP to reflect OFIs Done

DA 35/98 Condition 32 Noise Management Plan	2019 IEA OFI 008	Update the 'Noise and Amenity' aspect to make it more specific to noise. In particular, ensure that the Development Consent Conditions relevant to noise are included as 'Requirements' and that these are addressed in the plan. Also include further discussion of the noise monitoring program undertaken by the BIP including the monitoring locations and which receivers are impacted by the Botany CAP.	Include in the Noise section of the EMP the monitoring location that Ixom is impacted Done
DA 35/98 Condition 50 Waste Management Plan	2019 IEA OFI 009	Update the Waste Generation aspect (Section 6.2.4) to include further detail. Specifically, consider including the following: • Outline of the Development Consent Conditions relevant to waste • Outline the key legislative requirements relating to waste, in particular, the requirements of the POEO Act 1997 and POEO (Waste) Regulation 2014 • Include discussion of the potential impacts to resource depletion from inappropriate waste management • Include mitigation measures for solid waste management, including the prevention / minimisation of waste generation. • Identify the waste streams generated by the Botany CAP and include discussion of the management of each waste stream.	Update Waste Management plan to include recommendations. Provide further detail on the different waste streams generated by the Botany CAP and the management measures (including measures to reduce generation, storage, collection and disposal) for each waste stream. Included waste management details in the Waste section of the EMP document Done
	2019 IEA OFI 010	Consider developing a Waste Register (similar to the Materials Tracking Register prepared for MOD 5) to better track all waste generated and removed from site. This is also a requirement of IXOM's Global Waste Management Procedure (SHE-GBL-PRO-ENV-003 – Waste Generation)	Develop Waste tracking register and implement as part of the Waste Management procedure Done. Spreadsheet developed and included as part of the Waste Management Plan

DA 35/98 Condition 15 Traffic Management Plan	2019 IEA OFI 011	Include reference to the requirements of Condition 15 in the Traffic Management Plan. Specific mention should be made to the allocated entry to the site, via the main arterial roads	Include reference to the requirements in TMP Done
DA 35/98 Condition 13 Hazard Audit	2019 IEA OFI 012	Seek confirmation from the DPIE that the 2017 Hazard Audit had been provided and if not, re-submit report to the DPIE	Email to compliance@DPIE and find out. Done. Submitted 4/2/2020. Approved letter received 28/2/2020
DA 35/98 Condition 17 Traffic and Transport	2019 IEA OFI 013	Include in the sites Traffic Management Plan a description of the process in place and location of storage should a road tanker of chlorine be required to be parked on site. Also ensure it reflects the requirement that the time the full road tanker spends on site does not exceed 4380 hours in any 12-month period and how this would be tracked.	Include requirements in the TMP. Done
DA 35/98 Condition 18 Traffic and Transport	2019 IEA OFI 014	Consult with the property landlord to request general maintenance of the visitor car park	Done. Request for maintenance and rectification has been made to Orica, who is considering the request.
DA 35/98 Condition 32 Noise	2019 IEA OFI 015	Request to have Conditions 32 and 33 removed / updated in the next Modification to reflect the noise limits set out in the EPL.	Consult with DPIE. Make a prompt in Compliance Matrix Table to do this Next Mod
DA 35/98 Condition 50 Waste	2019 IEA OFI 016	Provide further detail on the different waste streams generated by the Botany CAP and the management measures (including measures to reduce generation, storage, collection and disposal) for each waste stream.	Include requirements in the WMP. WMP Work Instruction has been made available in SP DMS, short version is included in the EMP Done