INDEPENDENT ENVIRONMENTAL AUDIT 2023

Weston Aluminium

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Ian Richardson 17 November 2023

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INDEPENDENT AUDIT REPORT DECLARATION FORM

Independent Audit Report Declaration Form	
Project Name	Weston Aluminium - 2023 Independent Environmental Audit
Consent Number	DA 86-04-01 and LEC10397-1995
Description of Project	Triannual Independent Environmental Audit
Project Address	129 Mitchell Avenue, Kurri Kurri NSW 2327
Proponent	Weston Aluminium Pty Ltd ABN 91 075 245 108
Title of Audit	Weston Aluminium - 2023 Independent Environmental Audit
Date	17 November 2023

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	Ian Richardson
Signature	
Qualification	Bachelor of Environmental Science
Company	RPS AAP Consulting Pty Ltd
Company Address	Unit 2A, 45 Fitzroy Street, Carrington NSW 2294

EXECUTIVE SUMMARY

RPS AAP Consulting Pty Ltd (RPS) was engaged by Weston Aluminium Pty Ltd (Weston Aluminium) to conduct an Independent Environmental Audit (IEA) of the Weston Aluminium Resource Recovery facility located in Kurri Kurri, New South Wales.

The audit was conducted in accordance with Schedule 4, Condition 64 of the Weston Aluminium Development Consent (DA 86-04-01 Mod 14 and LEC 10397 of 1995 Mod 12, identically worded and henceforth referred to as DA 86-04-01). Weston Aluminium requested the IEA scope to include the Independent Compliance Audit required by Condition E1 of Environment Protection Licence (EPL) 6423.

The most recent IEA carried out at the site was conducted for the period of 19 May 2017 to 3 September 2020. The audit period to which this audit applies is inclusive of the period from 3 September 2020 to 31 October 2023 (date of the audit site inspection). This report presents the findings of this audit.

The IEA was undertaken in general accordance with:

- The NSW Department of Planning, Industry and Environment Independent Audit Post Approval Requirements, May 2020 (IEA Requirements, 2020).
- AS/NZS ISO 19011:2014 Guidelines for auditing management systems.
- RPS's proposal (dated 24 May 2023).

The RPS audit team was approved by the NSW Department of Planning and Environment (the Department) on 7 June 2023. A copy of the approval letter is located in **Appendix A**. A one-day site inspection was conducted at Weston Aluminium on 31 October 2023.

A major fire incident occurred on site on 14 November 2021. Weston Aluminium experienced a loss of infrastructure and disruption to regular operations for an extended period due to the incident. The incident resulted in a number of non-compliances against DA 86-04-01 and EPL 6423. Auditors reviewed correspondence between Weston Aluminium and relevant agencies and found that Weston Aluminium took all reasonable measures to reduce environmental harm during and following the event.

Auditors found Weston Aluminium's environmental management system to be comprehensive. Auditors reviewed all management plans and monitoring programs required under DA 86-04-01 and found them to be adequate for managing environmental impacts. Upon site inspection, auditors determined Weston Aluminium's environmental management plans have been implemented effectively during the audit period.

The IEA identified a total of 13 non-compliances against DA 86-04-01 and Environment Protection Licence (EPL) 6423.

GLOSSARY OF TERMS

Abbreviation	Description
AQMP	Air Quality Monitoring Program
Council	Cessnock City Council
CEMP	Construction Environmental Management Plan
the Department	Department of Planning and Environment (DPE)
DA	Development Application
DG	Dangerous Goods
EA	Environmental Assessment
EIS	Environmental Impact Statement
EMS	Environmental Management System
EPA	NSW Environmental Protection Authority
EPL	Environmental Protection Licence
ESAP	Energy Savings Action Plan
ESCP	Erosion and Sediment Control Plan
Ha	Hectare
IEA	Independent Environmental Audit
IMS	Integrated Management System
MEX	MEX Maintenance Software
MOD	Modification
NMP	Noise Management Plan
NSW	New South Wales
OEMP	Operational Environmental Management Plan
OFI	Opportunity for Improvement
OSMS	On-site Sewage Management System
OWS	Oil Water Separator
RFI	Request for information
RPS	RPS AAP Consulting Pty Ltd
Secretary	Secretary of the Department of Planning and Environment or delegate
SSD	State Significant Development
TWA	Trade Waste Agreement
VOC	Volatile Organic Compound
WMP	Water Management Plan

1 INTRODUCTION

RPS AAP Consulting Pty Ltd (RPS) was engaged by Weston Aluminium Pty Ltd to conduct an Independent Environmental Audit (IEA) of the Weston Aluminium facility located at 129 Mitchell Ave, Kurri Kurri NSW 2327.

The audit was conducted in accordance with Schedule 4, Condition 64 of the Weston Aluminium Development Consent (DA 86-04-01 Mod 14 and LEC 0397 of 1995 Mod 12, as consolidated) and RPS' proposal dated 24 May 2023. Weston Aluminium requested RPS include the Independent Compliance Audit required by Condition E1 of Environment Protection Licence (EPL) 6423 as part of the scope of the audit.

The last IEA carried out at the site under DA 86-04-01 Mod 14 and LEC 10397 of 1995 Mod 12 (identically worded and henceforth referred to as DA 86-04-01) was conducted for the period of 19 May 2017 to 3 September 2020. The audit period to which this audit applies is inclusive of the period from 3 September 2020 to 31 October 2023 (date of the audit site inspection). This report presents the findings of the audit.

1.1 Background of the project

1.1.1 The facility

Weston Aluminium operates an aluminium recycling and refining facility at 129 Mitchell Avenue, Kurri Kurri, NSW. The site traditionally recycled aluminium dross and aluminium scrap to produce aluminium sow, ingot and puck. Spent potlining residues, derived from the primary aluminium sector, were also detoxified and beneficiated for various reuse opportunities in the construction products manufacturing industry. The facility has the capacity to process up to a combined 40,000 tonnes per year of dross and SPL, and up to 35,000 tonnes per year of scrap.

In addition to aluminium recycling, the site also has approval for commercial scale processing of pharmaceutical and illicit drug waste. This waste includes expired, superseded, unused and off-specification medications, derived from pharmaceutical manufacturers, aged-care facilities, hospitals and other healthcare providers. Illicit drug wastes include plant material and pill form drugs, derived from confiscated and evidentiary materials managed by NSW Police (AECOM, 2017).

Weston Aluminium has recently taken on an approach focused on its core business, aluminium recycling and refining. No SPL has been processed onsite since March 2020 and processing rates of aluminium dross have declined from previous peaks. Scrap shredders on site have been decommissioned within the audit period.

1.1.2 Approval history

DA86-04-01 was originally approved in 2001. There are 14 modifications approved at the time of the audit site inspection, with Modification 15 currently under assessment. A summary of the DA 86-04-01 modification history is provided below

- Modification 1: Approved 04 October 2001, for alterations to the administration building extension
- Modification 2: Approved 08 August 2002, for an addition of an annex on the process building
- Modification 3: Approved 04 September 2009, for the addition of new process and storage areas and increase the efficiency of the existing development
- Modification 4: Approved 05 August 2010, for a two-week trial of SPL material processing
- Modification 5: Approved 07 February 2011, for the construction and operation of a briquetting facility to process Aldex ash into briquettes in the existing Aldex building
- Modification 6: Approved 25 October 2011, for approval to undertake a 12-month trial to process up to 200 tonnes of SPL in existing rotary furnaces
- Modification 7: Approved 07 September 2012, for a commercial-scale processing of 2nd cut spent potlining material

- Modification 8: Approved 17 February 2013, for a 12-month trial processing mixed spent potlining in existing rotary furnaces
- Modification 9: Approved 15 September 2015, for a 24-month trial processing illicit drug and pharmaceutical wastes
- Modification 10: Approved 01 March 2017, to allow for the commercial scale processing of First Cut SPL
- Modification 11: Withdrawn, trial the processing of up to 1,000 tonnes of quarantine waste over a two-year period
- Modification 12: Approved 02 August 2019, to allow the processing of up to 2,000 t/year of pharmaceutical waste and 5 t/year of illicit drug waste in existing furnaces
- Modification 13: Withdrawn, administrative changes
- Modification 14: Approved 03 September 2021 for reconfiguration of emission control including the construction of a new baghouse -scrubber which will then be dedicated to the reverberatory furnace operation
- Modification 15: Under assessment at the time of the audit, for receipt, storage and shredding of up to 20,000 tonnes per annum of general solid waste including off-specification, damaged, mis-labelled, recalled, expired, unused or surplus consumer products

1.1.3 November 2021 fire incident

On the morning of Sunday 14 November 2021, a fire started on the Weston Aluminium premises. The fire was initially confined to an external hardstand area but expanded due to the influence of strong westerly winds despite the efforts of external emergency response. The fire progressed to the front bays (the southern section of the Plant Building), and the eastern section of the Aldex Building. Other site facilities were largely unaffected.

The fire was originally detected by community members, who contacted emergency services. The building fires were extinguished in the same evening but contained stockpile fires burned until 16 November 2021. Return of site control from Fire & Rescue NSW to Weston Aluminium occurred on Wednesday 17 November 2021, at which point Weston Aluminium staff were able to access limited safe zones and assess the status of the facility.

The fire was not deliberately started by Weston Aluminium, nor related to Weston Aluminium operational activities as the plant was closed at the time the fire started. The fire was determined to have initiated at two discrete and isolated areas of rain-soaked hand sanitiser stocks on the south-western hardstand area.

Weston Aluminium notified the NSW RFS, NSW EPA and SafeWork NSW about the incident. Weston Aluminium worked with relevant agencies including the EPA to clean up and restore the site. A number of non-compliances were incurred as a result of the fire, as explained throughout this report and audit checklists. The outcomes of the fire incident also include stormwater diversion and containment, runoff reconfiguration, a fire waste management plan in consultation with the NSW EPA, verification of pollution control systems, assessment of authorised storage requirements / capacity and upgrades to site security systems.

1.1.4 Further incidents

Other notable incidents at the site include a molten metal spill and a baghouse fire, which occurred in July 2022 and July 2023 respectively. A Show Cause was issued to Weston Aluminium by the NSW DPE on 18 October 2023 in relation to the non-compliance. A meeting between the DPE and Weston Aluminium was held on 24 October 2023. Weston Aluminium then provided a response to the Show Cause on 24 October 2023.The DPE issued Weston Aluminium a warning letter on 1 November 2023 (outside the audit period) regarding the incidents, believing Weston Aluminium failed its obligation to notify the Department of incidents under Schedule 4 Condition 57 of DA 86-04-01. Further detail on incidents that occurred within the audit period is provided in **Section 4.2**.

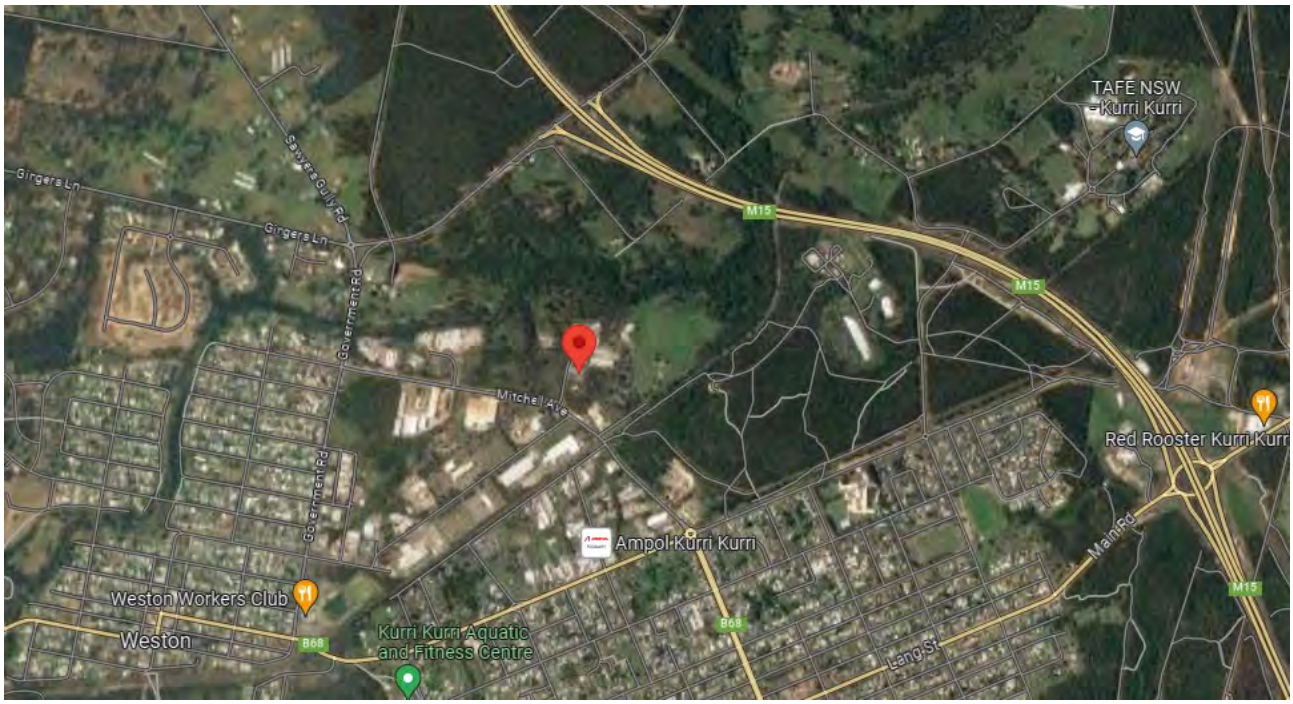

Figure 1 - Site location

1.2 Approvals and Licences

The current approvals and licences that were reviewed as part of this IEA are summarised in **Table 1** below.

Table 1 Summary of Existing Major Approvals and Licences

Title	Agency	Expiry
DA 86-04-01	Department of Planning, Industry and Environment	In perpetuity
LEC 10397 of 1995	Department of Planning, Industry and Environment	In perpetuity
EPL 6423	NSW Environment Protection Authority (EPA)	Review required 9 March 2028

1.3 Audit team

The RPS 2023 IEA team consisted of the personnel outlined in **Table 2** below. The audit team was approved by the Department to conduct the audit. Refer to the letter from the Department provided in **Appendix A**.

Table 2 2023 IEA Audit Team

Personnel	Audit Team Role
Ian Richardson	Lead Auditor – RPS
Luke Wiggins	Auditors Assistant – RPS

1.4 Audit Scope

The requirements for the IEA under DA 86-04-01. And for the Independent Compliance Audit under EPL 6423 are detailed in **Table 3** and **Table 4** below.

Table 3 DA 86-04-01 IEA Requirements

Project Approval Conditions	Requirement	IEA Report Section
Schedule 4, Condition 64	Within one year of the commencement of operation, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must	IEA Report (this report)

Project Approval Conditions	Requirement	IEA Report Section
	commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must:	
Schedule 4, Condition 64(a)	be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020);	Section 2
Schedule 4, Condition 64(b)	be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and	Section 1.3
Schedule 4, Condition 64(c)	be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary).	Section 1.5
Schedule 4, Condition 67	Twelve months after the commencement of DA 86-04-01 Mod 12 and every three years thereafter, or at such intervals as the Planning Secretary may agree, the Applicant must carry out a comprehensive Hazard Audit of the development and within one month of each audit submit a report to the satisfaction of the Planning Secretary for approval. The audits must be carried out at the Applicant's expense by a qualified person or team, independent of the development, approved by the Planning Secretary prior to commencement of the audit. Hazard Audits must be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit Guidelines'.	Completed as a separate audit

Table 4 EPL 6423 IEA Requirements

Project Approval Conditions	Requirement	IEA Report Section
Schedule 8, Condition E1.1	The licensee must conduct an independent compliance audit no less than once every three (3) years to assess and report on compliance with the conditions of this licence, including the adequacy of the documentation required by this licence. A report containing the audit findings must be submitted with the Annual Return.	IEA Report (this report)

1.5 Audit Period

The last IEA carried out at the site under DA 86-04-01 Mod 14 and LEC DA 10397 of 1995 Mod 12 (identically worded) was conducted for the period of 19 May 2017 to 3 September 2020. The audit period to which this audit applies is inclusive of the period from 3 September 2020 to 31 October 2023 (date of last day of audit site inspection). This IEA report is therefore due to the Department 1 December 2023.

2 AUDIT METHODOLOGY

RPS undertook the IEA in accordance with the following methodology:

- Task 1: Audit preparation
- Task 2: Site visit and interviews
- Task 3: Preparation of a draft IEA report for review by Weston Aluminium
- Task 4: Finalisation of the IEA report.

2.1 Task 1 Audit Preparation

2.1.1 Pre-Audit Meeting and Documentation Requests

RPS undertook initial discussions with Weston Aluminium to organise the audit, including the provision of documentation through requests for information (RFI) and provided an audit agenda for the site visit and timing.

Review of documentation provided by Weston Aluminium and their representatives and preparation of compliance assessment checklists that included a list of conditions of key regulatory approvals to be assessed for compliance.

2.1.2 Approval and Regulator Consultation

Following DPE approval of the RPS Audit Team, RPS consulted with relevant regulators via email, with respect to the audit scope and in accordance with the DPE *Independent Audit Post Approval Requirements*, *2020*.

Relevant comments and requests from these regulators were included in the Audit Report and investigated as part of the audit as required.

2.2 Task 2 Site Inspection and Interviews

The Audit Team conducted the audit site visit over one day on 31 October 2023, comprising:

- Document reviews.
- Interviews with relevant personnel.
- Site inspection.
- Opening and closing meetings

Opening and closing meetings were held to ensure open communication with Weston Aluminium and provide preliminary Audit findings. The audit was conducted as per the Audit Agenda, which was determined with Weston Aluminium at the site visit opening meeting.

2.2.1 Opening Meeting

An opening meeting was held upon commencement of the audit at the site. The purpose of this meeting was to confirm the objectives of the audit, the scope of the audit, the resources required and methodology to be applied. An agenda for the site visit was also determined considering auditors priorities, previous audit recommendations and stakeholder input.

2.2.2 Site Inspection and Interviews

The Audit Team undertook a site inspection, which involved physical validation of evidence and collection of a photographic record. The auditor's observations supplemented information gathered during desktop review of documents and records.

During the site inspection, interviews were conducted with the following Weston Aluminium staff:

- Christopher McClung - Environment and Sustainability Manager
- Dean Latter - Maintenance Manager
- Ebony Prior - Admin Support Officer.

Staff interviews were used to support evidence gathered by auditors confirming or denying compliance with DA 86-04-01 and EPL 6423.

2.2.3 Close-out Meeting

At the completion of the audit site visit, a brief close-out meeting was held with relevant Weston Aluminium personnel. The purpose of the close-out meeting was to provide and receive feedback on the audit process and present the summary of preliminary findings, recommendations, and any post-audit actions. It should be noted that additional findings based on detailed document reviews as part of the audit process were required following the completion of the site inspection. As such, the summary of preliminary findings detailed in the closeout meeting did not cover all findings associated with the audit. The audit team maintained continuous communication with Weston Aluminium post site inspection regarding findings of the audit.

2.3 Task 3 Draft IEA Report

During the site visit and as required following the site visit, the audit team reviewed relevant documentation to DA 86-04-01 and EPL6423. Each requirement within the audit compliance tables was reviewed and evidence was gathered to support an assessment of compliance. While personal communication/interviews provide valuable insight, they cannot be solely relied upon as verification of compliance.

An assessment of environmental performance was undertaken and reported in the audit report where issues were identified. A review of the Weston Aluminium's environmental management strategy and environmental monitoring programs were undertaken, and a summary provided in the audit report.

A single consolidated report was prepared (this report), with separate audit checklists appended to address each of the approval instruments.

2.4 Task 4 Finalise IEA Report

Following receipt of consolidated comments from Weston Aluminium, RPS updated and finalised the IEA Report and reissued for Weston Aluminium to submit to the Department via the Major Project website.

2.5 Audit Team Approval

The Department reviewed the nominations and information provided in accordance with the requirements of the consents and the Independent Audit Post Approval Requirements (DPE, 2020) (IEA Guideline) and was satisfied that the RPS audit team was suitably qualified and experienced.

The audit team was approved by the Department on 7 June 2023. A copy of the approval letter is provided in **Appendix A**.

2.6 Scope Development

The IEA was undertaken in general accordance with:

- The Department's Independent Audit Post Approval Requirements (DPE, 2020)
- AS/NZS 19011:2014 Guidelines for auditing management systems (Standards Australia, 2014)
- RPS's proposal (dated 24 May 2023).

2.7 Consultation

The IEA Requirements stipulate that the IEA must include consultation with relevant agencies. A summary of the input regulatory agencies is provided in **Table 5.** The relevant agencies were sent requests for comment on Thursday 20 July 2023.

Table 5 Regulator Response Summary

Regulatory Agency	Response Received	Date Received
Department of Planning, Industry and Environment	Yes	03/08/2023
NSW Environmental Protection Agency	Yes	28/07/2023
Cessnock City Council	No	

A summary of comments received from the regulatory agencies as well as responses to regulator consultation is provided in **Appendix C**. While a response was received from the NSW EPA, the agency advised that it would not provide comment on the IEA, hence the exclusion of NSW EPA from the Agency Consultation Summary checklist.

2.8 Site Inspection

A single day site inspection was conducted at Weston Aluminium, Kurri Kurri on 31 October 2023. During the site inspection the weather conditions were generally fine with the daytime temperature ranging from approx. 22ºC in the morning to 32ºC in the afternoon. No significant rainfall events were noted to have occurred prior to the site inspection. Low to moderate winds were experienced during the day.

Photographs from the audit site inspection supporting audit findings are provided in **Appendix D**.

2.8.1 Opening and Closing Meetings

In accordance with *ISO 19011:2014 Guidelines for Auditing Management Systems*, opening and closing meetings were held during the site inspection. Attendees included Ian Richardson - Lead Auditor (RPS), Luke Wiggins – Assistant Auditor (RPS) and Christopher McClung - Environment and Sustainability Manager (Weston Aluminium).

2.8.2 Site Interviews

2.9 Compliance Status

The compliance status was determined using the relevant descriptors in accordance with the Independent Audit Post Approval Requirements (NSW DPE, 2020) provided in **Table 6** below.

Table 6 Compliance Status Descriptors

Status	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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

Previous audit descriptors of partial compliance, partial non-compliance, not verified or administrative non-compliance or other similar terms must not be used in accordance with the above requirements.

As part of the Audit evaluation, the auditor may make observations, including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the project. Any observations or notes are in addition to the compliance status descriptor assigned to each compliance requirement, limited to the descriptors listed in **Table 6**.

2.10 Evidence Validation

The audit team undertook verification activities to confirm the reliability of audit evidence. This included interviews, data checking, the examination of records, and site inspection. Records were provided in electronic and/or hard copy by site personnel and additional documents were reviewed on site.

Some aspects of the audit process may have relied on information such as judgements and assumptions where external supporting evidence was unavailable or limited. Where this information was considered, its validity was confirmed to the extent possible prior to use by the auditors and is noted in appropriate areas of the audit checklists.

The majority of information was assessed off-site prior to the site inspection. The site inspections concentrated on assessment of the effectiveness of environmental management and adequacy of performance. The extent of audit activities was limited to the time available for the audit site inspections and interviews on the day.

3 ENVIRONMENTAL MANAGEMENT

A detailed implementation review was conducted against each management plan condition in DA 86-04-01 and can be found in the audit checklist in **Appendix B**. The approved strategies, plans or programs required under DA 86-04-01 including a brief summary of the implementation review conducted against each plan are summarised in **Table 7**. This section satisfies the IEA requirement to review the adequacy of any approved strategies, plans or programs.

Table 7 Management Plan Adequacy Review

Document	Findings from Review
Air Quality Monitoring Program (AQMP)	The Air Quality Monitoring Program is currently on Revision 13, last updated in March 2023 and approved by the NSW EPA and NSW DPE. The AQMP details processes around air quality assessment and validation, provides appropriate mitigation measures and timeframes to maintain compliance and outlines methods to respond to potential exceedances. The AQMP also provides responsibilities of staff members, reporting requirements and a process for management review. The AQMP was determined by auditors to adequately address the conditions of consent and state of operations observed during site inspection. Auditors determined the AQMP is being implemented effectively on site based on site observations and review of monitoring data.
Noise Monitoring Program	Auditors reviewed WA's most recent OEMP (April 2020), including the Noise Management Plan contained in Section 6. The NMP contains a monitoring protocol along with management measures to address any exceedances. While there have been some noise related complaints during the audit period, each complaint was investigated and only one complaint was attributable to operations at WA. The source of the noise that caused the complaint was found to be an alarm, which was relocated in response to the complaint and no further complaints in relation to this noise source have been received. Overall, auditors deem the Noise Monitoring Program adequate.
Erosion and Sediment Control Plan	The Erosion Management Plan and OEMP were prepared as part of the 2001 EIS. Plans were prepared by Boyden & Partners 03 May 1997 and approved by EPA, CCC and DLWC. The OEMP was last updated in April 2020. Site inspection revealed the effective implementation of these plans as no runoff or discharges were observed.
Site Rehabilitation Plan	The Clearing and Site Rehabilitation Plan was prepared as part of 'Additions to the Kurri Kurri Aluminium Refining and Recycling Facility Volume 2 Construction Environmental Management Plan' dated April 2001. The plan was prepared by Boyden & Partners 03 May 1997 and approved by EPA, CCC and DLWC. Auditors observed effective rehabilitation to have taken place in areas required on site.
Landscape Management Plan	The Landscape Management Plan was prepared as part of 2001 CEMP. The LMP is considered as part of subsequent modifications and for consistency with the Asset Protection Zones (APZs) developed in consultation with NSW RFS. There has been no change to the Landscape Management Plan since the previous audit.
Water Management Plan	The Water Management Plan was prepared as part of the OEMP under the 2001 EIS. Plans were prepared by Boyden & Partners 03 May 1997 and approved by EPA, CCC and DLWC. The OEMP was last updated in April 2020. Site inspection revealed the effective implementation of these plans as no runoff or spillages were observed.
Energy Saving Action Plan (ESAP)	Weston Aluminium's Energy Saving Action Plan was prepared and finalised in June 2010 by Advitech Pty Ltd. The ESAP has not been revised since it was originally published. The process of recycling aluminium is energy intensive by nature. The ESAP examines the processes involved and identifies potential improvements in energy performance. Correspondence with relevant Weston Aluminium personnel and desktop data review suggested the ESAP has been effectively carried out. It was recommended

Document	Findings from Review
	under the 2020 IEA that Weston Aluminium consider updating the ESAP. The ESAP has not yet been updated.
Emergency Plan	The original Emergency Plan was prepared and approved by Planning NSW in 2002. The plan has since been updated to reflect recent mods. Auditors reviewed the Emergency Response Plan and deemed it adequate. Site inspection confirmed the plan is being implemented effectively with observations made of appropriate safety measures around site, including signage and appropriate PPE. Auditors also inspected staff training programs which included appropriate safety training and the Weston Aluminium Safety Management System, which was observed to be comprehensive.
Construction Environmental Management Plan (CEMP)	Auditors sighted and reviewed the Construction Environmental Management Plan (CEMP) for the Air Emissions Reconfiguration Project (DA 86-01-01 Mod 14). The CEMP was deemed comprehensive with all relevant management plans contained and prepared adequately. Site inspection confirmed proper implementation of the CEMP.
Operational Environmental Management Plan (OEMP)	The most recent version of the OEMP and all of its appended sub plans were reviewed by RPS auditors for adequacy and effectiveness of implementation. The OEMP Revision 5 was prepared by AECOM Australia Pty Ltd in April 2020. The OEMP identifies potential environmental issues associated with the development and addresses standards, objectives, controls and monitoring and reporting requirements. The OEMP contains all required subplans and is appropriately detailed for effective environmental management. Site inspection and audit findings generally support effective implementation of the OEMP.

4 ENVIRONMENTAL PERFORMANCE

This section assesses the requirement of independent environmental audits to review the environmental performance of the development and whether it is complying with the relevant requirements in the approval and EPL. RPS based the assessment of the environmental performance of the site on the following:

- **Section 3** provides an assessment of the effectiveness and adequacy of the environmental management plans and programs required under DA 86-04-01.
- An assessment of compliance with the conditions of DA 86-04-01 and EPL 6423. The findings of this assessment are provided in the compliance checklists presented in **Appendix B** with the identified non-compliances and associated recommendations summarised in the Audit Findings in **Section 6.**
- **Section 4.1** provides a review of compliance management practices in place at Weston Aluminium.
- **Section 4.2** provides a review of incidents reported during the audit period.
- **Section 4.3** provides a review of complaints received during the audit period.

4.1 Compliance Management

4.1.1 Compliance Monitoring

Compliance with the conditions of DA 86-04-01 and EPL 6423 is consistently monitored by the Environment and Sustainability Manager, who undertakes the Weekly Enviro Inspection. The inspection is conducted under a checklist, shown in the site photos and the results are recorded in an internal spreadsheet for review. The Weekly Enviro Inspection checklist was deemed comprehensive by auditors and the weekly frequency of the inspections is deemed adequate for maintaining compliance.

More broadly, compliance is monitored and tracked using a compliance register spreadsheet, which is presented in each annual compliance report. Required actions are tracked in an internal compliance calendar, which ensures Weston Aluminium is aware of deadlines for reporting, notification and other actions in advance.

4.1.2 Internal Assurance

Weston Aluminium's Environmental Management System (EMS) was reviewed by auditors and deemed adequate in managing environmental issues associated with the development. Weston Aluminium received certification of its Integrated Management System (IMS) under *AS/ANZ ISO 9001:2016 Quality Management Systems* in 2019. The IMS conglomerates Weston Aluminium's management systems into one integrated and efficient system including the Safety Management System (SMS), Quality Management System (QMS) and the EMS. The EMS is also separately certified under *AS/NZS ISO 14001:2016 Environmental Management Systems*.

Weston Aluminium's IMS (certified to PASS99: 2012) is an integrated framework which acts as a guide to identify and mitigate environmental impacts associated with the development. The continuous application of technological improvements to minimise environmental emissions and impacts is an operational value for Weston Aluminium. The EMS is made up of the following components:

- An environmental policy
- A register of aspects and impacts
- A register of environmental legislation and standards which applies to the Plant
- Objectives and targets
- Environmental program
- Structure and responsibility
- Training, awareness and competence
- Communication

- EMS documentation
- Document control
- Operational control
- Emergency procedures and response
- Monitoring and measurement
- Non-conformance and corrective and preventive action
- Records
- EMS Audit
- Management Review

4.2 Incidents

Weston Aluminium has a comprehensive incident management and notification system, utilising a STEMS database. When an incident is observed or reported by a staff member, it is recorded in STEMS and tracked through to closure. **Table 8** provides a breakdown of incidents that occurred in the audit period. No further incidents were reported or discovered by auditors.

Table 8 Environmental Incidents during the Audit Period

Year	Details of Incident	Comments
2023	Baghouse 1 Fire	A fire incident occurred at 7:25am 3 July 2023, affecting Baghouse No. 1. The fire occurred inside the baghouse and was quickly controlled and put out by emergency services. No injuries or health issues occurred as a result of the fire. Operating conditions were normal leading up to the incident as per email correspondence between Weston Aluminium's Environment and Sustainability Manager and the DPE on 25 September 2023. Weston Aluminium received a Show Cause on 18 October 2023 regarding this incident and the Baghouse 1 Fire following a Request for Information on 5 September 2023. Weston Aluminium worked with the DPE to define an incident under the consent conditions as the term was not clearly defined in DA 86-04-01. The parties came to the agreement that Weston Aluminium would take on the definition of an incident under the POEO Act and Weston Aluminium was issued an official warning letter by the DPE 2 November 2023 (outside the audit period.)
2022	Molten metal leak	A molten metal leak resulting in fire occurred around 9:50pm 12 July 2022. The leak was caused by a failure of the Reverberatory Furnace tap out block. Molten metal leaked around the cone at the tap out plug and froze into the launders, resulting in a spill around the furnace and under the casting chain. No injuries or health issues occurred as a result of the incident. Weston Aluminium received a Show Cause on 18 October 2023 regarding this incident and the Baghouse 1 Fire following a Request for Information on 5 September 2023. Weston Aluminium worked with the DPE to define an incident under the consent conditions as the term was not clearly defined in DA 86-04-01. The parties came to the agreement that Weston Aluminium would take on the definition of an incident under the POEO Act and Weston Aluminium was issued an official warning letter by the DPE 2 November 2023 (outside the audit period.)
2021	November 2021 Fire	On the morning of Sunday 14 November 2021, a fire started on the Weston Aluminium premises. The fire was initially confined to an external hardstand area but moved due to

Year	Details of Incident	Comments
		fanning from strong westerly winds. The fire progressed to the front bays (the southern section of the Plant Building), and the eastern section of the Aldex Building. Weston Aluminium notified the NSW RFS, NSW EPA and SafeWork NSW about the incident. Weston Aluminium worked with relevant agencies including the EPA to clean up and restore the site. A number of non-compliances were incurred as a result of the fire, as explained throughout the report and audit checklists. Further detail on the November 2021 Fire is provided in **Section 1.1.3**.

S = Schedule C = Condition

4.3 Complaints

Weston Aluminium operates a community complaints telephone line continuously during operation. Weston Aluminium is also receptive to email or face to face complaints, with contact details being provided at the front gate of the site and on the public facing website. All complaints are recorded through Weston Aluminium's internal complaints management register, which was viewed by auditors prior to site inspection. Complaints are then reported in the annual Compliance Report.

A total of 23 complaints have been made since the beginning of the 2020 reporting period, three of which could possibly be attributable to Weston Aluminium's operations upon investigation. Investigation summaries of the complaints can be found in each annual Compliance Report.

The summaries contain details relating to the complaint and the complainant. Further details are contained in Weston Aluminium's internal complaints management register, with time, date, method, contact details, complaint type and response/action taken by Weston Aluminium showcased in a table. Complaint summaries are located in Section 8 of each report for the audit period. Written summaries of complaint details, possible contributing factors and rectifying actions taken by Weston Aluminium are provided to the NSW EPA after receiving and investigating each complaint.

Weston Aluminium's attention to community complaints is commendable. Each complaint is recorded and investigated in depth. Where required, complainants are contacted with questions about their complaint to more deeply understand the nature of their complaints and reasonable remedial actions have been taken where possible.

A summary of the complaints that can be attributed to Weston Aluminium operations is provided below.

4.3.1 23 September 2020

This complaint regarded an alarm sounding intermittently through the night to the north of the Weston Aluminium site. Weston Aluminium responded by relocating the alarm siren from its external location to an internal location within the plant building to attenuate the noise. No complaints regarding the alarm have been received since the alarm siren relocation. No further details were provided in the Compliance Report.

4.3.2 4 February 2022

One complaint attributable to Weston Aluminium operations was received in the 2021-2022 reporting period. The complaint related to processing of a single bale of domestic scrap (later determined to have contained concealed contaminants such as rubber, plastic and timber), which was fed to the Reverberatory Furnace, creating smoke and elevated temperatures in the air exhaust. This elevated temperature condition caused the baghouse fan to undergo an emergency over-temperature shutdown. Operators immediately discontinued baled scrap feed, and re-started the baghouse fan, thus restoring furnace ventilation. Following further scrap inspection and investigation, the remaining consignment of bailed scrap was shredded to remove any entrained contaminants. Weston Aluminium continues to apply its existing protocols in relation to scrap procurement, inspections and quality control (acceptance/rejection), including regular liaison with the

scrap providers in relation to quality standard expectations. Similar issues have not been experienced since the complaint occurred.

4.3.3 23 November 2022

A visible dust complaint was made on 23 November 2022, which was investigated and found to be a result of the handling of demolished building materials during post-baghouse fire rectification works.

Roofing sheeting was being moved to the scrapyard for processing and insulation materials were being piled, moved into bays and put in skip bins. Visible dust emission was caused by these activities, performed by mobile plant under temporary flood lighting. Weston Aluminium's complaints register suggests flood lighting directed towards the works could have magnified the visibility of the emissions. In response, Weston Aluminium now applies less agitative handling techniques to manage dust emissions.

5 STATUS OF 2020 IEA RECOMMENDATIONS

The IEA conducted a reviewed against the recommendations made in the 2020 IEA conducted by RPS. The findings from this review have been provided in **Appendix B.**

6 AUDIT FINDINGS

The findings of the IEA compliance assessment are presented in this section.

A summary of compliance against DA 86-04-01, EPL 6423 and results from the 2020 IEA and agency consultation is provided in **Table 9** below. The non-compliances and corresponding recommendations are summarised in **Section 6.1** and detailed in **Appendix B.**

Table 9 Summary of Audit Findings

Approval	Total No. of Conditions	Compliant	Non-Compliant	Noted	Closed	Open
DA 86-04-01	92	51	7	34		
EPL 6423	95	58	6	31		
2020 IEA	17				12	5
Agency Consultation	3				3	

6.1 Identified Non-Compliances and Recommendations

6.1.1 DA 86-04-01

Non-Compliances identified against DA 86-04-01 have been summarised in **Table 10** below. Further audit commentary and evidence is provided against each condition in the DA 86-04-01 Audit Checklist provided in **Appendix B**.

Table 10 Non-Compliances against DA 86-04-01

Ref No.	Condition Ref	Requirement	Independent Audit Finding	Recommendation
DA29	S3 C21	The Applicant must maintain a continuous fluoride emission monitoring system, which in the event that the concentration of fluoride emitted to atmosphere exceeds the limit value of 1.4 milligrams per cubic metre must activate visible and audible alarms.	The HF monitoring and control instrumentation was damaged by the November 2021 fire incident. The HF monitoring and control system was inoperable between 14 Nov 2021 and 26 Jul 2022. The damage to instrumentation was out of Weston Aluminium's control. Weston Aluminium remedied the non-compliance and now maintains continuous, compliant monitoring, the results of which are published monthly.	No further action required.
DA31	S3 C23	A continuous recording and alarmed bag leak detector must be installed in each stack servicing the facility, excluding the stack 6, with calibration to detect bag failure. The results shall be included in the annual report required under condition 58 of this consent. In the event of a bag failure the failed bag shall be repaired or replaced as soon as possible within the current operational cycle.	Some controls and instrumentation associated with the monitoring systems was destroyed by the premises fire on 14 November 2021. Replacement of particulate monitoring systems and recommissioning was completed in March 2023 as per Weston Aluminium's 2022-23 Compliance Report.	No further action required.
DA34	S3 C25	Except as may be expressly provided in an EPL for the development, the Applicant shall comply with Section 120 of the Protection of the Environment Operations Act 1997.	Annual water quality monitoring is performed at Main Pond discharge point (Point 12) in accordance with EPL requirements, evident in Annual Returns. Between 2012 and the November 2021 fire event, treated first flush waters (removal of particulates, metals, nutrients and oil & grease) were reused on site for irrigation purposes. Weston Aluminium has reported no direct discharges to the environment as a result of operational activities. In response to the November 2021 fire event,	The discharges to the Swamp Creek catchment were a result of response to an emergency incident. Weston Aluminium has reconfigured its stormwater system in response to the incident. No further corrective actions are required.

Ref No.	Condition Ref	Requirement	Independent Audit Finding	Recommendation
			and as requested by EPA, site flows were directed to the Main Pond and the former first flush by-pass service was isolated to prevent discharge of stormwaters to the environment. Contained stormwaters were recovered by tanker for offsite discharge (interim arrangement), and subsequently disposed of to Trade Waste following consultation with Hunter Water. This post-fire configuration (capture and containment of all site flows (clean and potentially dirty), followed by Trade Waste discharge, has been maintained by Weston Aluminium. However, probable discharges of firefighting water and foam were reported to have occurred during the fire on 14 and 15 November 2021. The discharge is likely to have occurred to the Swamp Creek catchment through the headwall outlet to the north of the site. It is noted that the discharge was the result of the response to an emergency. Auditors discovered no further signs of water pollution during site inspection.	
DA35	S3 C25A	All pharmaceutical waste must be stored in an enclosed (appropriately bunded and covered) area to prevent the contamination of stormwater.	Due to increased waste generation and processing demand in response to the Covid-19 Pandemic; and limited processing capacity elsewhere within Australia), Weston Aluminium's internal storage capacities were exhausted, and some quantities of pharmaceutical wastes were stored outside. This non-compliance was reported by Weston Aluminium in 2022. It is noted that since remediation of this non-compliance, there are no freestanding waste stockpiles or waste stores	Since the non-compliance, Weston Aluminium reports all waste has been stored appropriately. It is recommended that Weston Aluminium continues to apply the Authorised Waste Storage Plan and Clinical Waste Receipt and Storage Plan developed in cooperation with the EPA.

Ref No.	Condition Ref	Requirement	Independent Audit Finding	Recommendation
			in the open air. All waste was observed to be stored in appropriately bunded and covered areas during site inspection.	
DA48	S3 C36	The Applicant shall store and handle all dangerous goods, as defined by the Australian Dangerous Goods Code, strictly in accordance with: a) all relevant Australian Standards; b) a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and c) the EPA's Environment Protection Manual Technical Bulletin Bunding and Spill Management.	Heightened market demand due to increased waste generation and processing demand in response to the Covid-19 Pandemic; and limited processing capacity elsewhere within Australia caused Weston Aluminium's internal storage capacities to be exhausted, and some quantities of pharmaceutical wastes were stored outside, as reported in 2022 Compliance Report. No waste was observed to be stored outside during the audit site inspection. Auditors observed all waste to be stored in appropriately bunded and covered areas in line with Australian Standards and the EPA's Environment Protection manual Technical Bulletin Bunding and Spill Management during site inspection. However, the 2023 Hazard Audit by Advitech Pty Ltd was reviewed by auditors, which found the workshop DG cabinet was not appropriately labelled.	The following recommendation was made in the 2023 hazard Audit: install the sign AS 1940:2017 sign "NO SMOKING, NO IGNITION SOURCES WITHIN 3 m' in lettering at least 50 mm high and ensure all electrical devices within this radius are appropriately Ex rated. The store qualifies as a packaged Class 3 package store (cabinet) and must be shown on the Site Plan. Update the Manifest Site Plan to show the location of this store. The cabinet volume is above 250 L capacity and is therefore a Placard quantity store and must be included on the Hazardous Chemicals Manifest and notified to SafeWork NSW.
DA57	S3 C45	Except as expressly permitted by an EPL, the Applicant 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, or any waste generated at the site to be disposed of at the site.	A consignment of brushes (3.28 tonnes) was received on site, as reported in 2022 Compliance Report. These wastes were not classified under the EPA's Waste Classification Guidelines and are considered not expressly permitted by the EPL. This waste was reportedly destroyed by the fire event on 14 November 2021. No additional consignments of this waste type were observed to have been received in Weston Aluminium's reporting or weighbridge records.	It is recommended that WA continues to apply the Authorised Waste Storage Plan and Clinical Waste Receipt and Storage Plan developed in collaboration with the EPA.
DA80	S4 C57	The Department must be notified in writing to	The Department was notified of the 14	No further action required

Ref No.	Condition Ref	Requirement	Independent Audit Finding	Recommendation
		compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix C.	November 2021 fire incident by email and via Major Projects Portal on 19 November 2021. Appendix C stipulates that the report must be submitted within 30 days. The full written report (prepared in accordance with Appendix C requirements) was submitted on 17 Dec 2021, past the 30-day period. Weston Aluminium has amended its compliance calendar to ensure no deadlines will be missed in future Separate incidents occurred on the Weston Aluminium premises in July 2022 and July 2023. These incidents involved a molten metal spill and a fire. Weston Aluminium did not notify the DPE of these incidents due to misunderstanding around notification requirements and the lack of a definition of the term 'incident' under DA 86-04-01. Weston Aluminium liaised with the DPE to clarify the definition of an 'incident' and has now adopted the meaning of an incident as described in the POEO Act.	

6.1.2 Environmental Protection Licence 6423

Non-Compliances identified against EPL 6423 have been summarised in **Table 11** below. Further audit commentary and evidence is provided against each condition in the EPL 6423 Audit Checklist provided in **Appendix B**.

Table 11 Non-Compliances against EPL 6423

Ref No.	Condition Ref	Requirement	Independent Audit Finding	Recommendation
EPL09	L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Annual water quality monitoring is performed at Main Pond discharge point (Point 12) in accordance with EPL requirements, evident in Annual Returns. Between 2012 and the November 2021 fire event, treated first flush waters (removal of particulates, metals, nutrients and oil & grease) were reused on site for irrigation purposes.	The discharges to the Swamp Creek catchment were a result of response to an emergency incident. WA has reconfigured its stormwater system in response to the incident. No further corrective actions are required.

Ref No.	Condition Ref	Requirement	Independent Audit Finding	Recommendation
			Weston Aluminium has reported no direct discharges to the environment as a result of operational activities. In response to the November 2021 fire event, and as requested by EPA, site flows were directed to the Main Pond and the former first flush by-pass service was isolated to prevent discharge of stormwaters to the environment. Contained stormwaters were recovered by tanker for offsite discharge (interim arrangement), and subsequently disposed of to Trade Waste following consultation with Hunter Water. This post-fire configuration (capture and containment of all site flows (clean and potentially dirty), followed by Trade Waste discharge, has been maintained by Weston Aluminium. However, probable discharges of firefighting water and foam were reported to have occurred during the fire on 14 and 15 November 2021. The discharge is likely to have occurred to the Swamp Creek catchment through the headwall outlet to the north of the site. It is noted that the discharge was the result of the response to an emergency. Auditors reviewed the Site Drainage Report (Royal HaskoningDHV, 2022) which verifies the reconfigured surface water management post 2021 fire incident. The original dam capacity was 650m³. This has now been increased to 2,900m³. Auditors discovered no further signs of water pollution during site inspection.	
EPL18	L4.1	The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to	Auditors sighted waste tracking sheets provided by Weston Aluminium. Weston Aluminium's tracking and inspection	Weston Aluminium followed NSW EPA directions to repackage and remove the remaining waste that had not yet been processed

Ref No.	Condition Ref	Requirement	Independent Audit Finding	Recommendation
		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.	system, observed during site inspection, ensures that no waste outside of the definitions, related activities and other limits provided in the table is processed on site. No evidence of improper waste processing was observed during desktop or site inspection. However, it was reported in the 2020-2021 Annual Return that hand sanitiser wastes were received, stored and processed in rotary furnaces between 22 June 2021 and 18 December 2021. The hand sanitiser waste is classified as non-liquid pharmaceutical waste. Weston Aluminium followed NSW EPA direction to repackage and remove the remaining hand sanitiser waste from site 10 January 2022. Weston Aluminium’s ‘Action Register – November 2021 Fire Incident & Other Related Matters’ contains a review of historical communications, which was reviewed by auditors. This documentation confirmed that Weston Aluminium ceased processing of hand sanitiser waste once becoming aware of the non-compliance and donated the remaining stock for reuse.	from the site. It is recommended that all waste types are classified correctly before processing in future. Ensure all staff are familiar with NSW EPA Waste Classification Guidelines 2014 .
EPL23	L7.1	The licensee must comply with the conditions as specified in this licence or where no specific conditions are outlined in this licence, the licensee must comply with the "Chemical Control Order in Relation to Aluminium Smelter Wastes containing Fluoride and/or Cyanide, 1986".	Administrative non-compliance triggered by non-compliances relevant to other conditions of the EPL.	Follow recommendations against non-compliances to ensure compliance with the EPL going forward.
EPL32	O6.1	The continuous fluoride emission monitoring system associated must activate visible and audible alarms in the event that the concentration of fluoride emitted to atmosphere via	The November 2021 fire event damaged the HF monitoring and control instrumentation, resulting in the inoperability of the alarms from the time of the incident until 26 July 2022.	No further action required.

Ref No.	Condition Ref	Requirement	Independent Audit Finding	Recommendation
		Point 1 exceeds 1.4 milligrams per cubic metre.	Site inspection confirmed reinstatement of alarms. The alarms on the continuous fluoride emission monitoring system activate conservatively at a fluoride concentration of 1.2 mg/m3.	
EPL36	O6.5	The licensee must store and handle all liquid chemicals and hazardous materials used at the premises within bunded areas that are constructed and maintained in accordance with the following: a) any relevant Australian Standards for the liquids being stored; b) within a bunded area with a minimum bund capacity of 110% of the volume of the largest single stored vessel within the bund; c) the Storing and Handling Liquids: Environmental Protection Participant's Manual (DECC, 2007); and where any conflict exists between these requirements, the most stringent requirements apply. Note: For the purpose of this condition, any tanks or other storage vessels that are interconnected and may distribute their contents either by gravity or automated pumps must be considered a single vessel.	Auditors viewed 'Weston Aluminium Authorised Waste Storage Study) dated March 2022, along with the Waste Receipt and Storage Plan dated May 2022. Weston Aluminium provided evidence that waste (especially liquid chemicals and hazardous materials) is stored according to the Waste Receipt and Storage Plan, in the form of the 'Hazard Identification and Risk Assessment' worksheets for the Dross Storage, Handling and Processing Area and the Pharmaceutical and Illicit Drug Waste Processing Procedure. This was further backed up by the 'Receipt, Storage and Handling of Toxic and Infectious Substances' procedure. There are no freestanding waste stockpiles or waste stores in the open air. All waste storage areas are appropriately signposted to inform personnel, including emergency personnel, of their content under the Waste Management Plan. However, the 2023 Hazard Audit by Advitech Pty Ltd was reviewed by auditors, which found the workshop DG cabinet was not appropriately labelled.	As described in the Hazard Audit 2023, install the sign AS 1940:2017 sign "NO SMOKING, NO IGNITION SOURCES WITHIN 3 m' in lettering at least 50 mm high and ensure all electrical devices within this radius are appropriately Ex rated. The store qualifies as a packaged Class 3 package store (cabinet) and must be shown on the Site Plan. Update the Manifest Site Plan to show the location of this store. The cabinet volume is above 250 L capacity and is therefore a Placard quantity store and must be included on the Hazardous Chemicals Manifest and notified to SafeWork NSW.
EPL56	M2.1	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	Auditors sighted Annual and 6-monthly Air Emissions Monitoring Reports relevant to the audit period. It is noted that Stack 2 and Stack 3 have been decommissioned and removed, therefore no testing is required. Monitoring methodology for Monitoring Points was observed to be appropriate with respect to units of	Weston Aluminium has reinstated the appropriate monitoring instrumentation since the fire event. Monitoring has been undertaken in a compliant manner since the equipment was reinstated.

Ref No.	Condition Ref	Requirement	Independent Audit Finding	Recommendation
		opposite in the other columns:	measurements, frequency and sampling method. This non-compliance was caused by the November 2021 fire event at the site. The fire damaged monitoring instrumentation and the HF system was inoperable in 2022 until 26 July, when it was reinstated. This resulted in a large portion of missing data for the reporting period. According to the 2021-22 Annual Return, no fluoride-containing furnace inputs were processed at the premises between the incident and 26 July 2022. A portion of cyanide monitoring data from the first half of the 2021 reporting period is also absent due to fire damage to monitoring instrumentation. However, annual cyanide monitoring suggests that the cyanide emissions on a yearly basis were negligible (<0.0083 mg/m3).	
EPL82	E1.1	The licensee must conduct an independent compliance audit no less than once every three (3) years to assess and report on compliance with the conditions of this licence, including the adequacy of the documentation required by this licence. A report containing the audit findings must be submitted with the Annual Return.	This audit was conducted to satisfy this condition. The previous audit was reviewed. It was found that WA neglected to provide a copy of the previous audit report to the NSW EPA in conjunction with the 2019-2020 Annual Return. The missed submission was an administrative oversight by WA.	Weston Aluminium has updated its internal compliance calendar to ensure this does not happen in future. No further action required.

Appendix A
Appointment of Experts

Department of Planning and Environment

Christopher McClung
Environment & Sustainability Manager
Weston Aluminium
Awabakal and Wonnaruah Country
129 Mitchell Avenue
Kurri Kurri, NSW, 2327

07/06/2023

Dear Christopher

Weston Aluminium Waste (DA86-04-01 and LEC10397-1995)
IEA Audit Team - Assessment for DPE endorsement

I refer to your request (DA86-04-01-PA-19) for the Secretary's approval of suitably qualified persons to prepare the 2023 Independent Environmental Audit (IEA) for the Weston Aluminium Waste facility, as required by the conditions of development consents DA86-04-01, as modified and LEC10397-1995, as modified.

The Department of Planning and Environment (the department) has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. In accordance with the conditions of development consents DA86-04-01, as modified and LEC10397-1995, as modified, and the Independent Audit Post Approval Requirements (Department 2020), the Planning Secretary has agreed to the following audit team:

- Ian Richardson – Lead Auditor
- Dianne Munro – Auditor
- Luke Wiggins – Assistant Auditor

Please note that this approval of the above audit team is conditional upon them maintaining certification as a lead auditor with a relevant industry body.

The IEA must be prepared, undertaken and finalised in accordance with the conditions of development consents DA86-04-01, as modified and LEC10397-1995, as modified and the Independent Audit Post Approval Requirements (Department 2020). Failure to meet these requirements will require revision and resubmission.

Please ensure this correspondence is appended to the IEA Report.

Should you wish to discuss the matter further, please contact Joel Fleming on 0467 715 429 or joel.fleming@planning.nsw.gov.au

Yours sincerely

Heidi Watters
Team Leader Northern
Compliance

As nominee of the Planning Secretary

Appendix B
Audit Checklists

AUDIT CHECKLIST – DEVELOPMENT CONSENT DA 86-04-01& LEC 10397 OF 1995

AUDIT CHECKLIST – DEVELOPMENT CONSENT DA 86-04-01& LEC 10397 OF 1995 1
SCHEDULE 2 - ADMINISTRATIVE CONDITIONS 3
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT 3
TERMS OF APPROVAL 3
LIMITS ON APPROVAL 5
Management Plans/ Monitoring Programs 7
STRUCTURAL ADEQUACY 7
OPERATION OF PLANT AND EQUIPMENT 8
Extended Spent Potlining Material Processing Trial 8
Illicit Drug Waste and Pharmaceutical Waste Processing Trial (DA 86-04-01 Mod 9) 8
SCHEDULE 3 - SPECIFIC ENVIRONMENTAL CONDITIONS 9
AIR 9
Emission Limits 9
Construction 10
Operation 10
Health Impact Assessment 13
SOIL AND WATER 13
Discharge Limits 13
Erosion and Sediment Control 15
NOISE 15
Operating Hours 15
Noise Limits 15
Operating Conditions 16
Noise Monitoring 16
Pre-commissioning Studies 17
Pre-operation Emergency Services Cooperation Agreement 18
Dross Importation Protocol 19
Dangerous Goods 19
Emergency Stop System 19
TRANSPORT 20
Road Network and Parking 20
Vehicle Queuing 20
Transport Code of Conduct 20
VISUAL 21
Lighting 21
Landscape Management Plan 21
WASTE 22
Operating Conditions 22
Waste Recycling Investigation 23
FLORA AND FAUNA 23
ABORIGINAL CULTURAL HERITAGE 24
GREENHOUSE GAS 25
Energy Savings Action Plan 25
Monitoring and Reporting 25
EXTENDED SPENT POTLINING MATERIAL PROCESSING TRIAL 26
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Table 1 Development Consent DA 84-04-01 and LEC 10397 of 1995

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
SCHEDULE 2 - ADMINISTRATIVE CONDITIONS					
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT					
DA01	S2 C1	The Applicant shall implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction and/or operation of the development.	The site inspection indicated that Weston Aluminium (WA) is implementing reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction and operation of the project. After reviewing a record of communication between WA and relevant agencies regarding the November 2021 fire incident, the July 2022 molten metal spill incident and the July 2023 baghouse 1 fire incident, it is the position of the auditors that WA acted quickly to ensure harm to the environment was minimised where safely possible. WA demonstrated broad general compliance with the majority of non-compliances being a result of incidents outside of WA control (i.e the Nov 21 fire).	Compliant	
TERMS OF APPROVAL					
DA02	S2 C2	The Applicant shall carry out the development generally in accordance with the: a) EIS as modified by the SEE; b) site plans (see Appendix A); c) conditions of this approval; and, during the spent potlining material processing trial, d) modification application DA-86-04-01 Mod 4 and 10397 Mod 2, and the enclosed Letter dated 26 May 2010 and Attachments 1, 2 and 3. e) Modification application DA-86-04-01 Mod 5 and 10397 Mod 3, and the enclosed SEE, dated November 2010, prepared by GHD; and	Desktop review and site inspection confirmed that WA is carrying out the development in general accordance with the EIS as modified. The site layout and operations were as described in the documentation and WA demonstrated general compliance.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		f) during the extended spent potlining material processing trial, modification application DA-86-04-01 Mod 6 and 10397 Mod 4, and the enclosed Environmental Assessment, dated June 2011 and the Response to Submissions dated 17 August 2011, prepared by Weston Aluminium. g) Modification application DA-86-04-01 Mod 7 and 10397 DA 10397 of 1995 Mod 5, and the enclosed Environmental Assessment, dated 10 May 2012 prepared by AECOM and the Response to Submissions dated 21 June 2012, prepared by Weston Aluminium. h) Modification application DA-86-04-01 Mod 8 and DA 10397 of 1995 Mod 6, and the enclosed Environmental Assessment, dated 30 November 2012, prepared by Weston Aluminium. i) Modification request DA 86-04-01 Mod 9 and DA 10397 of 1995 Mod 7 and the enclosed Environmental Assessment, dated 12 March 2015, prepared by Weston Aluminium and the Response to Submissions, dated 15 July 2015, prepared by Weston Aluminium. j) Modification request Modification request DA 86-04-01 Mod 10 and DA 10397 of 1995 Mod 8 and the enclosed Environmental Assessment, dated 8 September 2016, prepared by AECOM and the Response to Submissions, dated 13 December 2016, prepared by AECOM. k) Modification request DA 86-04-01 Mod 12 and DA 10397 of 1995 Mod 10 and the enclosed Environmental Assessment, dated 10 July 2017, prepared by AECOM and the Response to Submissions, dated 3 November 2017 as amended by the additional information received on 12 April 2018, 30 August 2018, 22 October 2018, 13 December 2018, 28 February 2019, 8 April 2019 and 3 May 2019. l) Modification application DA 86-04-01 MOD 14 and the enclosed Statement of Environmental Effects, dated 4 June 2020 prepared by AECOM and the letter dated 24 Jul 2020 prepared by Todoroski Air Sciences including the Emissions Testing Report October 2013 Stack 5 and 6 dated 22 November 2013 prepared by AECOM. as amended by the Weston Aluminium Facility Emission Reconfiguration Modification Report dated 9 March 2021 prepared by AECOM			

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		and the letter dated 29 July 2021 prepared by Todoroski Air Sciences. If there is any inconsistency between the above, the conditions of this approval shall prevail to the extent of any inconsistency.			
DA03	S2 C3	The Applicant shall comply with any reasonable requirement/s of the Planning Secretary arising from the Department's assessment of: a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this approval; and b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.	WA received a Request for Information dated 5th September 2023 regarding alleged failure to notify the Department of the July 2022 metal spill and Jul 2023 BH1 fire events. After reviewing correspondence between the parties, auditors determined that WA complied with the DPE's requests and returned requested information in a timely manner.	Compliant	
DA04	S2 C4	Prior to each of the events listed below, or within such period otherwise agreed by the Planning Secretary, the Applicant shall certify in writing to the satisfaction of the Planning Secretary, that it has complied with all conditions of this consent applicable prior to that event: a) commencement of any physical works associated with the development; and b) commencement of operations.	Commencement of physical works and operations occurred prior to this audit period.	Not triggered	
LIMITS ON APPROVAL					
DA05	S2 C5	The Applicant shall not process on site more than a combined total of 40,000 tonnes of dross aluminium, SPL and illicit and pharmaceutical waste and 35,000 tonnes of scrap metal aluminium per year.	Relevant reporting is contained in WA's annual compliance reports. A review of compliance reports confirmed less than 40,000 tonnes of dross aluminium, SPL and illicit and pharmaceutical waste and 35,000 tonnes of scrap metal aluminium was processed each reporting year.	Compliant	
DA06	S2 C5A	The Applicant shall not process on site more than 2,000 tonnes of pharmaceutical waste and 5 tonnes of illicit drug wastes per year.	Review of Compliance Reports for each reporting year during the audit period revealed quantities of pharmaceutical waste and illicit drug waste processed on site were well below the approved quantities.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
DA07	S2 C5B	No more than 5 % by mass of pharmaceutical and illicit drug waste is to be co-processed with Aluminium Dross and/or SPL in the furnaces.	Review of Compliance Reports for each reporting year during the audit period revealed a maximum rate of 4.9% coprocessing.	Compliant	
DA08	S2 C5C	The Applicant must not process liquid pharmaceutical or illicit drug waste unless approval is granted by the EPA.	No liquid pharmaceutical or illicit wastes were processed before EPA approval was received. A Thermal Processing Assessment was commissioned 22 October 2022 to evaluate thermodynamics and verify processing approach. The assessment was then submitted to the EPA to support an EPL Variation application. Liquid waste processing was approved by the EPA in March 2023.	Compliant	
DA09	S2 C6	The Applicant shall not process more than 15,000 tonnes per year of dross aluminium sourced from overseas smelters and secondary aluminium processors.	A total weight of 1612 T of secondary aluminium has been processed throughout the entire audit period according to annual Compliance Reports. No overseas dross aluminium has been processed within the audit period.	Compliant	
DA10	S2 6A	The Applicant shall ensure that the combined total of SPL and aluminium dross stored on site does not exceed 5,000 tonnes at any time.	No SPL has been processed on site since March 2020. Maximum combined storage recorded was 3,379 tonnes as reported in compliance reports during the audit period.	Compliant	
DA11	S2 6B	The Applicant shall ensure that DA-86-04-01 Mod 8: a) is undertaken over a period of 12 months only; and b) during the operation of DA-86-04-01 Mod 8: i. no more than 3,000 tonnes of mixed spent potlining material is received on site over the 12 month trial period; and ii. no more than 1,000 tonnes of mixed SPL is stored on site at any one time.	The 12-month trial processing mixed spent potlining in existing rotary furnaces as per Mod 8 was completed by April 2016. Results were reported as part of the Monitoring and Verification Report (20 May 2016).	Not triggered	
DA12	S2 6C	The Applicant shall ensure that DA 86-04-01 Mod 9: a) is undertaken over a trial period of not more than 24 consecutive months only; and	The 24 month trial was closed out and completed by October 2017. 1.9 tonnes of illicit drugs were received and processed	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		b) during the operation of DA 86-04-01 Mod 9: i. no more than 200 tonnes of illicit drug waste is received or processed on site over the 24 month trial period; and ii. no more than 1,000 tonnes of pharmaceutical waste is received, stored or processed on site over the 24 month trial period.	during the trial, along with 141 tonnes of pharmaceutical. Results were reported as part of Monitoring & Verification Report (10 Nov 2017).		
Management Plans/ Monitoring Programs					
DA13	S2 C7	With the approval of the Planning Secretary, the Applicant may submit any management plan or monitoring program required by this approval on a progressive basis.		Noted	
STRUCTURAL ADEQUACY					
DA14	S2 C8	Within six months of the commencement of DA-86-04-01-Mod 3, the Applicant shall obtain and provide copies of all necessary building certificate(s) from Cessnock City Council to the Planning Secretary, for the following works: a) extension of the ALDEX building; b) eight dross storage bays within the ALDEX building; c) pre-processing plant within the ALDEX building; d) annex to the Plant Building; e) covered conveyor between the ALDEX building and the Plant Building; f) Workshop in the north-western corner of the site; and g) Stack 6.	Actions required were undertaken prior to the audit period as confirmed by previous audit.	Not triggered	
DA15	S2 C9	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia.	Auditors sighted Construction Certificates provided to Weston Aluminium by Cessnock City Council, applicable to post-fire (November 2021) rebuild of the Plant Building (southern portion) and Aldex Building (eastern portion).	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
OPERATION OF PLANT AND EQUIPMENT					
DA16	S2 C10	The Applicant shall ensure that all plant and equipment used on the site is maintained and operated in an efficient manner, and in accordance with relevant Australian Standards.	WA utilise a Maintenance Database (MEX) for plant asset maintenance. Schedules (frequency) and Work Orders derived from this system were observed during the site inspection. Example Preventative Maintenance Orders (lime scrubber system, furnace refractory checks and baghouse motor testing) from which Work Orders are raised were provided by WA to auditors.	Compliant	
Extended Spent Potlining Material Processing Trial					
DA17	S2 C10A	Prior to the commencement of the DA-86-04-01 Mod 8, the Applicant must: a) obtain an updated EPL allowing DA-86-04-01 Mod 8 to proceed; and b) notify the Planning Secretary, Council and the EPA's Regional Manager Hunter in writing, 1 week prior to the commencement of DA-86-04-01 Mod 8 and within 2 days of the conclusion of the trial.	Required actions were taken prior to the audit period.	Not triggered	
Illicit Drug Waste and Pharmaceutical Waste Processing Trial (DA 86-04-01 Mod 9)					
DA18	S2 C10B	Prior to the commencement of DA 86-04-01 Mod 9, the Applicant must: a) obtain an updated EPL allowing DA 86-04-01 Mod 9 to proceed; and b) notify the Planning Secretary, Council and the EPA's Regional Manager Hunter in writing, two weeks prior to the commencement of DA 86-04-01 Mod 9 and within two weeks of the conclusion of the trial.	Required actions were taken prior to the audit period.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
SCHEDULE 3 - SPECIFIC ENVIRONMENTAL CONDITIONS					
AIR					
Emission Limits					
DA19	S3 C11	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements, as specified in the EPL applicable to the site.	The 2020 cyanide monitoring finding, and those associated with subsequent 2021 monitoring events, have confirmed compliance with the limit criterion. Biannual cyanide emission monitoring events have been scheduled since the EPL Anniversary Date in accordance with EPL requirements. It is noted that WA reported a non-compliance to the NSW EPA during the COVID period, however the EPA did not deem this to be a non-compliance.	Compliant	
DA20	S3 C13	The Applicant shall update its existing Air Quality Monitoring Program for the development to the satisfaction of the Planning Secretary. This program must: a) be prepared in consultation with the EPA; b) be submitted to the Planning Secretary for approval within one month from the commencement of DA 86-04 01 Mod 14 and c) include: - a program to validate the air emissions of the development, which involved carrying out monitoring of the emissions from the development; - mitigation measures and timeframe for their implementation in case of non-compliances with the emission limits referred to in condition 11; and - a program to monitor the ongoing performance of the development.	WA's AQMP update was prepared August 2022 and issued to EPA 31 August 2022, then to the DPE via the Planning Portal 14 September 2022 (following consultation with EPA). EPA response 08 September 2022 (EPA does not review or comment on management plans). DPE acknowledgement was received 28 September 2022. The AQMP was further updated in March 2023 to reflect the EPL Variation permitting the processing of pharmaceutical and illicit drug waste in Rotary Furnace No. 2. Auditors reviewed the AQMP document prior to site inspection. An air quality monitoring program is contained in Section 4. Mitigation measures are found in Section 6. A program to monitor the ongoing performance of the development can be found in Section 8.	Compliant	
DA21	S3 C13A	Within 12 months of commencement of DA 08-04-01 MOD 12, the Applicant must prepare, to the satisfaction of the Planning	A non-compliance was flagged in the 2020 IEA due to delays in receiving Air Emissions	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		Secretary, and submit to the EPA, an Air Emissions Verification Report. The Air Emissions Verification Report must include: a) air emission sampling results undertaken for the previous 12 months; b) a comparison of the emission sampling results against the discharge limits specified for point 1 in the EPL for the site; and c) the approach, including timeframe for implementation, to resolve any non-compliances with the EPL and the Protection of the Environment Operations (Clean Air) Regulation 2010.	Sampling Verification. The results were received and the report was submitted in December 2020. WA has amended its compliance calendar to ensure no future issues with delays to receiving sampling results impact compliance.		
DA22	S3 C14	The Applicant shall ensure that discharge points serving the facility are designed, constructed and operated generally in accordance with the parameters outlined in the EPL for the Development.	The previous audit confirmed compliance with this condition. Site inspection further validated compliance.	Compliant	
Construction					
DA23	S3 C15	During construction, the Applicant shall ensure that: a) all trucks entering or leaving the site with loads have their loads covered; b) trucks associated with the development do not track dirt onto the public road network; and c) the public roads used by these trucks are kept clean.	Construction was completed prior to the audit period.	Not triggered	
Operation					
DA24	S3 C16	The Applicant shall implement all reasonable and feasible measures to minimise the dust generated by the development.	WA received a dust/visible emissions related complaint that was the result of operations onsite. WA report that the complaint was attributed to the processing of a single bale of domestic scrap (later determined to have contained concealed contaminants such as rubber, plastic and timber), which was fed to the Reverberatory Furnace, creating smoke and elevated temperatures in the air exhaust. This elevated temperature condition caused the baghouse fan to undergo an emergency	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			over-temperature shutdown. Operators immediately discontinued baled scrap feed, and re-started the baghouse fan, thus restoring furnace ventilation. Following further scrap inspection and investigation, the remaining consignment of bailed scrap was subsequently shredded to remove any entrained contaminants. Weston Aluminium continues to apply its existing protocols in relation to scrap procurement, inspection and quality control (acceptance/rejection), including regular liaison with the scrap market in relation to quality standard expectations. A visible dust complaint was also made in 2023, which was investigated and found to be a result of the handling of demolished building materials during post-baghouse fire rectification works. Roofing sheeting was being moved to the scrapyard for processing and insulation materials were being piled, moved into bays and put in skip bins. Visible dust emission was caused by these activities, performed by mobile plant under temporary flood-lighting. WA's complaints register suggests flood lighting directed towards the works could have magnified the visibility of the emissions. In response, WA now applies less agitative handling techniques to manage dust emissions. Some other dust-related complaints were made within the audit period but were determined to be attributable to either other sources or typical emission of steam from the plant building. Auditors determined WA are applying reasonable and feasible dust management measures.		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
DA25	S3 C17	Within three months of the commencement of DA-86-04-01-Mod 3, the Applicant shall isolate each of the eight dross storage bays by curtains to improve the collection efficiency of dust from the localised area.	Required actions were taken prior to the audit period.	Not triggered	
DA26	S3 C18	Within 6 months of the commencement of DA-86-04-01-Mod 3, the Applicant shall certify to the Planning Secretary that it has installed and commenced the operation of bag house No 7 in accordance with the SEE.	Required actions were taken prior to the audit period.	Not triggered	
DA27	S3 C19	Within 9 months of the commencement of DA-86-04-01-Mod 3, the Applicant shall certify to the Planning Secretary that it has installed and commenced the operation of bag house No 3 in accordance with the SEE, should the air quality monitoring referred to in condition 13 indicate that the air emission limit for BH No 7 referred to in condition 11 is exceeded.	Required actions were taken prior to the audit period.	Not triggered	
DA28	S3 C20	Within 6 months of the commencement of DA-86-04-01-Mod 3, the Applicant shall certify to the Planning Secretary that bag house No 2 has being detached from the ALDEX building and is servicing the dross storage area in the Plant Building only.	Required actions were taken prior to the audit period.	Not triggered	
DA29	S3 C21	The Applicant must maintain a continuous fluoride emission monitoring system, which in the event that the concentration of fluoride emitted to atmosphere exceeds the limit value of 1.4 milligrams per cubic metre must activate visible and audible alarms.	The HF monitoring and control instrumentation was damaged by the November 2021 fire incident. The HF monitoring and control system was inoperable between 14 Nov 2021 and 26 Jul 2022. The damage to instrumentation was out of WA's control. WA remedied the non-compliance and now maintains continuous, compliant monitoring, the results of which are published monthly.	Non-compliant	No further action required.
DA30	S3 C22	If the one-hour average concentration of gaseous fluoride emitted to atmosphere exceeds 1.4 milligrams per cubic metre at discharge point 1, then the plant or the section of the plant where the exceedance occurred, must cease operating until the Applicant is able to ensure compliance with the emission limits specified in the EPL for the Development.	No exceedances of gaseous fluoride concentration limits were recorded within the audit period.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
DA31	S3 C23	A continuous recording and alarmed bag leak detector must be installed in each stack servicing the facility, excluding the stack 6, with calibration to detect bag failure. The results shall be included in the annual report required under condition 58 of this consent. In the event of a bag failure the failed bag shall be repaired or replaced as soon as possible within the current operational cycle.	Some controls and instrumentation associated with the monitoring systems was destroyed by the premises fire on 14 November 2021. Replacement of particulate monitoring systems and recommissioning was completed in March 2023 as per WA's 2022-23 Compliance Report.	Non-compliant	No further action required.
DA32	S3 C23A	The Applicant must ensure all SPL is appropriately bunded and covered to prevent the emission of SPL dust, flammable gases and the contamination of stormwater	WA has no active contracts for receipt of SPL. WA reports it is no longer actively seeking SPL processing contracts. No SPL has been processed since March 2020, and no stocks have been held since. WA has recently renewed its Environmentally Hazardous Chemicals Act licence (no. 119) until 4 October 2026 to permit SPL processing if desired.	Not triggered	
Health Impact Assessment					
DA33	S3 C24	The Applicant shall participate and implement recommendations from any regional Health Impact Assessment to the satisfaction of the Planning Secretary.	A Human Health Risk Assessment was conducted for Modification 14 which provided no specific recommendations. No requests have been made for regional Health Impact Assessments to date. WA is open to participating in future HIAs as required, however this has not been identified as a condition of consent for Modification 15.	Compliant	
SOIL AND WATER					
Discharge Limits					
DA34	S3 C25	Except as may be expressly provided in an EPL for the development, the Applicant shall comply with Section 120 of the Protection of the Environment Operations Act 1997.	Annual water quality monitoring is performed at Main Pond discharge point (Point 12) in accordance with EPL requirements, evident in Annual Returns. Between 2012 and the November 2021 fire event, treated first flush waters (removal of particulates, metals, nutrients and oil & grease) were reused on site for irrigation purposes. WA has reported	Non-compliant	The discharges to the Swamp Creek catchment were a result of response to an emergency incident. WA has reconfigured its stormwater system in response to the incident. No further corrective actions are required.

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			no direct discharges to the environment as a result of operational activities. In response to the November 2021 fire event, and as requested by EPA, site flows were directed to the Main Pond and the former first flush by-pass service was isolated to prevent discharge of stormwaters to the environment. Contained stormwaters were recovered by tanker for offsite discharge (interim arrangement), and subsequently disposed of to Trade Waste following consultation with Hunter Water. This post-fire configuration (capture and containment of all site flows (clean and potentially dirty), followed by Trade Waste discharge, has been maintained by WA. However, probable discharges of firefighting water and foam were reported to have occurred during the fire on 14 and 15 November 2021. The discharge is likely to have occurred to the Swamp Creek catchment through the headwall outlet to the north of the site. It is noted that the discharge was the result of the response to an emergency. Auditors discovered no further signs of water pollution during site inspection.		
DA35	S3 C25A	All pharmaceutical waste must be stored in an enclosed (appropriately bunded and covered) area to prevent the contamination of stormwater.	Due to increased waste generation and processing demand in response to the COVID-19 Pandemic (and limited processing capacity elsewhere within Australia), WA's internal storage capacities were exhausted, and some quantities of pharmaceutical wastes were stored outside. This non-compliance was reported by WA in 2022. It is noted that since remediation of this non-compliance, there are no freestanding waste stockpiles or waste stores in the open air. All	Non-compliant	Since the non-compliance, WA reports all waste has been stored appropriately. It is recommended that WA continues to apply the Authorised Waste Storage Plan and Clinical Waste Receipt and Storage Plan developed in collaboration with the EPA.

<table>
<tr><th>Ref No.</th><th>Cond No.</th><th>Audit Finding & Recommendations</th><th>Comments & Evidence</th><th>Audit Findings</th><th>Recommendations</th></tr>
<tr><td></td><td></td><td></td><td>waste was observed to be stored in appropriately bunded and covered areas during site inspection.</td><td></td><td></td></tr>
<tr><td colspan="6">Erosion and Sediment Control</td></tr>
<tr><td>DA36</td><td>S3 C26</td><td>Prior to commencement of construction, the Applicant shall implement erosion and sediment controls in accordance with the Department of Housing and Landcom's Managing Urban Stormwater: Soils and Construction..</td><td>Construction commenced prior to the audit period.</td><td>Not triggered</td><td></td></tr>
<tr><td>DA37</td><td>S3 C27</td><td>The Applicant shall prepare and implement its Erosion and Sediment Control Plan, Site Rehabilitation Plan and
Water Management Plan detailing monitoring requirements and measures to control runoff from the site, contain spillages, minimise stormwater contamination, and dispose of contaminated water and process effluent. These plans shall be submitted to Council and EPA for approval prior to the commencement of construction of the development.</td><td>The relevant plans were prepared as part of the CEMP and OEMP relevant to the 2001 EIS. Plans were prepared by Boyden & Partners 03 May 1997 and approved by EPA, CCC and DLWC. Site inspection revealed the effective implementation of these plans as no runoff or spillages were observed.</td><td>Compliant</td><td></td></tr>
<tr><td colspan="6">NOISE</td></tr>
<tr><td colspan="6">Operating Hours</td></tr>
<tr><td>DA38</td><td>S3 C28</td><td>The Applicant shall comply with the restrictions in Table 3, unless otherwise agreed by the Planning Secretary.
Table 3. Construction Hours for the Development
<table><tr><th>Activity</th><th>Day</th><th>Time</th></tr><tr><td>Construction</td><td>Monday – Friday</td><td>7:00am to 6:00pm</td></tr><tr><td></td><td>Saturday</td><td>8:00am to 1:00pm</td></tr><tr><td></td><td>Sunday and Public Holidays</td><td>Nil</td></tr></table>Note: Construction activities may be conducted outside the hours in Table 3 provided that the activities are not audible at any residence beyond the boundary of the site.</td><td>WA reports to have abided by the allocated construction time periods during construction of Mod 14.
Restoration of 2 buildings occurred under council approvals. These constructions works all occurred within standard construction hours. No complaints suggested any construction works occurring outside of the approved hours.</td><td>Compliant</td><td></td></tr>
<tr><td colspan="6">Noise Limits</td></tr>
<tr><td>DA39</td><td>S3 C29</td><td>The Applicant shall ensure that the noise from the operation of the development does not exceed the noise limits presented in Table 4.</td><td>A Noise Compliance Study was completed by Spectrum Acoustics in October 2021. The report confirmed WA's compliance with Table 4.</td><td>Compliant</td><td></td></tr>
</table>

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		Table 4: Development Noise Limits (dB(A)) **Location** / **Daytime** / **Evening** / **Night time** Residences at the corner of Government Street and 10th Street: 48 / 48 / 40 / 47 / 35 / 57 Residences on Northcote Street: 44 / 44 / - / 44 / 40 / 57 Residences in the Light Industrial Zone on Mitchell Avenue and Railway Road: 43 / 43 / - / 43 / 41 / 55 *Note: Condition 30 of this consent does not impose maximum allowable noise limits for residences on Horton Road and McCarva Road as the Applicant has established a negotiated agreement with the landowner of those properties in regard to noise.*			
Operating Conditions					
DA40	S3 C30	The Applicant shall ensure that trucks are not entering and leaving the site outside the hours of 7.00am to 10.00pm.	WA reports truck access and egress from the site is typically limited to 7am - 5pm Monday to Friday. Occasionally trucks may access and exit site as late as 6pm by special arrangement. Auditors viewed weighbridge records and found no non-compliant truck movements.	Compliant	
DA41	S3 C30A	All doors adjacent the briquetting plant are to be closed at all times.	This condition is addressed in the Operational Environmental Management Plan, however it is no longer relevant as the briquetting plant was decommissioned in 2020 and all equipment has been removed (see site photos). No complaints have been made that were attributable to the briquetting plant. Nevertheless, auditors observed doors adjacent to briquetting plant to be closed at all times during site inspection.	Compliant	
Noise Monitoring					
DA42	S3 C31	The Applicant shall prepare and implement a Noise Monitoring Program, in consultation with the EPA. The Program shall be submitted for the approval of the Planning Secretary within three months of the commencement of operation of the development, and must include a noise monitoring protocol to evaluate compliance with development	Auditors reviewed WA's OEMP, including the Noise Management Plan contained in Section 6. The NMP contains an adequate monitoring protocol along with management measures to address any exceedances.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		noise limits specified in Condition 28 and management measures to address any exceedances.			
DA43	S3 C31A	If noise limits specified in Condition 28 are exceeded as a result of the briquetting plant modification, the Applicant shall fully enclose the concrete slab on the southern side of the Aldex building to the satisfaction of the Planning Secretary.	Modification occurred prior to the audit period.	Not triggered	
DA44	S3 C32	At least one month prior to construction of the development (except for construction of preliminary works that are outside the scope of the hazard studies), the Applicant shall submit for the approval of the Director General, the following studies: a) a Hazard and Operability Study for the process operations and fuel supply. This shall include the rotary cooler cooling water system, safeguards for hydrogen fluoride release, rotary furnaces and holding furnaces. The study shall be chaired by an independent qualified person approved by the Planning Secretary; b) a Final Hazards Analysis (FHA) prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No.6 'Guidelines for Hazard Analysis'; and c) arrangements covering the transport of hazardous materials including details of routes to be used for the movement of trucks. Further, the applicant shall enter into contractual arrangements with contract drivers to require the use of routes determined under this condition except where necessary for local deliveries. This should include a management plan and emergency procedures.	Construction occurred prior to audit period.	Not triggered	
Pre-commissioning Studies					
DA45	S3 C33	At least two months prior to commissioning of the development, the Applicant shall prepare and submit for the approval of the Planning Secretary a Preliminary Hazards Implementation Update, certifying that the recommendations made in following studies have been fully implemented: a) Dross Processing Plant Additions at Weston Kurri Kurri, NSW - Preliminary Hazard Analysis, prepared by	Actions relating to this condition were required prior to the audit period.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		Granherne and dated 25 October 1999; and b) Proposed Additional Facilities at the Weston Dross Processing Plant Weston, NSW - Molten Metal Transportation Risk Assessment. Where it has been decided not to implement a particular recommendation, the reasons shall be clearly stated.			
Pre-operation Emergency Services Cooperation Agreement					
DA46	S3 C34	Prior to the commencement of operation of the development, the Applicant shall develop an Emergency Services Cooperation Agreement in consultation with the emergency response teams relevant to the site and proposed haulage routes for molten aluminium (NSW Fire and Rescue, State Emergency Services and local bushfire fighting services, where relevant). The Agreement shall provide, but not necessarily be limited to: a) policies and procedures for the on-going supply of hazards information to the emergency response teams in relation to the site, molten aluminium transport and dross transport, including quantities and locations of hazardous materials and possible hazardous events associated with the site and dross/ molten aluminium haulage; b) policies and procedures for communication with the emergency response teams, and notification in the event of an emergency; c) any agreement for access to water stores at the development in the event of a bushfire; and d) any agreement for the provision of suitably qualified and appropriately trained employees from the site to assist where relevant in the event of a bushfire or emergency. The Emergency Services Cooperation Agreement shall be consistent with the Emergency Plan required under this consent. The Applicant shall supply a copy of the Emergency Services Cooperation Agreement to the Planning Secretary prior to the commencement of operation.	Prior to the audit period.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
Dross Importation Protocol					
DA47	S3 C35	Dross sourced from overseas smelters and secondary aluminium processors must be inspected prior to processing in accordance with the Inspection Protocol for Imported Dross, approved by the Land and Environment Court on 7 April 2000.	Imported dross inspection has not been required since 10 loads received in 2002.	Not triggered	
Dangerous Goods					
DA48	S3 C36	The Applicant shall store and handle all dangerous goods, as defined by the Australian Dangerous Goods Code, strictly in accordance with: a) all relevant Australian Standards; b) a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and c) the EPA's Environment Protection Manual Technical Bulletin Bunding and Spill Management.	Heightened market demand due to increased waste generation and processing demand in response to the Covid-19 Pandemic (and limited processing capacity elsewhere within Australia) caused WA's internal storage capacities to be exhausted, and some quantities of pharmaceutical wastes were stored outside, as reported in 2022 Compliance Report. No waste was observed to be stored outside during the audit site inspection. Auditors observed all waste to be stored in appropriately bunded and covered areas in line with Australian Standards and the EPA's *Environment Protection manual Technical Bulletin Bunding and Spill Management* during site inspection. It is noted that the 2023 Hazard Audit by Advitech Pty Ltd identified that the workshop DG cabinet was not appropriately labelled.	Non-compliant	The following recommendation was made in the 2023 hazard Audit: install the AS 1940:2017 sign "NO SMOKING, NO IGNITION SOURCES WITHIN 3 m' in lettering at least 50 mm high and ensure all electrical devices within this radius are appropriately Ex rated. The store qualifies as a packaged Class 3 package store (cabinet) and must be shown on the Site Plan. Update the Manifest Site Plan to show the location of this store. The cabinet volume is above 250 L capacity and is therefore a Placard quantity store and must be included on the Hazardous Chemicals Manifest and notified to SafeWork NSW.
Emergency Stop System					
DA49	S3 C37	At the commencement of DA-86-04-01-Mod 3, The Applicant shall have in operation emergency stop systems in ALDEX and Plant buildings, including a temperature sensor and an alarm, in the event of a fire.	Mod 3 commenced prior to this audit period.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
TRANSPORT					
Road Network and Parking					
DA50	S3 C38	The Applicant shall ensure that that haulage of molten aluminium is via Main Road 588 (Renshaw Drive) when travelling towards the Sydney- Newcastle Freeway (F3), rather than via Main Road 195 (Kurri Kurri-Mulbring Road) and Main Road 220 (Lake Road).	WA's original intent was to facilitate molten aluminium transfers between Weston Aluminium and Hydro Aluminium Kurri Kurri (then VAW). Transfer of molten aluminium was never performed and is no longer part of the Development. Hydro Aluminium closure occurred in 2011.	Not triggered	
DA51	S3 C39	The Applicant shall ensure that all parking generated by the development is accommodated on site. No vehicles associated with the development shall park on the public road system at any stage.	40 parking spaces are provided in the Main Carpark (including 2 Visitors and 1 Disabled), and areas along access driveway and throughout the site are provided to park trucks and other vehicles (e.g. contractor service vehicles), as required. No parking occurs on Mitchell Avenue or any other public road. Truck management (parking, flows in/out, etc) is facilitated by Weighbridge Staff members. Auditors did not observe any vehicles associated with the development parking on public roads.	Compliant	
Vehicle Queuing					
DA52	S3 C40	During the development, the Applicant shall ensure that the development does not result in any vehicles queuing on the public road network.	Queuing or parking on public access roads is strictly forbidden under the WA Driver Code of Conduct. Auditors did not observe any queuing or parking on public roads during site inspection.	Compliant	
Transport Code of Conduct					
DA53	S3 C41	Prior to the commencement of operation of the development, the Applicant shall submit for the approval of the Planning Secretary a Transport Code of Conduct to outline management of traffic impacts associated with the site and minimum requirements for the movement of heavy vehicles to and from the site. The Code shall meet the	Actions required prior to the audit period.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		requirements of Council and the RTA, should there be any. The Code shall include, but not necessarily be limited to: a) restrictions to routes, consistent with condition 37 of this consent; b) restrictions to the hours of transport operations, consistent with condition 29 of this consent, to avoid travelling built-up areas late at night or at times of high traffic flows in those areas; c) speed limits to be observed along routes to and from the site, in particular through built-up areas; d) minimum requirements for vehicle maintenance to address noise and exhaust emissions; e) load coverage requirements; and f) behavioural requirements for vehicle drivers.			
VISUAL					
Lighting					
DA54	S3 C42	The Applicant shall ensure that the lighting associated with the development: a) complies with the latest version of Australian Standard AS 4282(INT) - Control of Obtrusive Effects of Outdoor Lighting; and b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	Outdoor lighting set up has not been modified during the audit period. Some additional lighting was required during rebuilding of burnt buildings. This lighting was reported to have been pointed at the construction site at all times. No complaints were received regarding light spill.	Compliant	
Landscape Management Plan					
DA55	S3 C43	The Applicant shall prepare a Landscape Management Plan in consultation with Council prior to the commencement of construction of the development and provide details of existing and proposed tree and shrub species, finish of exposed surfaces (including paved areas), and outline a program for implementation.	The Landscape Management Plan was prepared as part of 2001 CEMP. The LMP is considered as part of subsequent modifications and for consistency with the Asset Protection Zones (APZs) developed in consultation with NSW RFS. There has been no change to the Landscape Management Plan since the previous audit.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
WASTE					
Operating Conditions					
DA56	S3 C44	The Applicant shall ensure that all waste generated on the site during construction and operation of the development is classified in accordance with the EPA's Waste Classification Guidelines and disposed of to a facility that may lawfully accept the waste.	WA sought a Specific Immobilisation Approval from the NSW EPA in 2005 (2005-S-13) for historical disposals. Protocol for sampling and assessment were developed. Extensions to the SIA were sought as required, including provision of statistical data analysis demonstrating classification (per TCLP fluoride) and compliance with the approval. Beyond some baghouse dust residues, WA claims to have achieved a zero-waste status with respect to process residues. Baghouse dust residues have been classified as general solid waste and disposed of accordingly. Residues generated in response to the 14 November 2021 fire event were contained, consolidated (like-for-like) and classified in consultation with NSW EPA prior to disposal offsite. Example Classification Summary for baghouse dust was shown to auditors by WA, which was deemed to be accurate and satisfactory.	Compliant	
DA57	S3 C45	Except as expressly permitted by an EPL, the Applicant 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, or any waste generated at the site to be disposed of at the site.	A consignment of brushes (3.28 tonnes) was received on site, as reported in 2022 Compliance Report. These wastes were not classified under the EPA's Waste Classification Guidelines and are considered not expressly permitted by the EPL. This waste was reportedly destroyed by the fire event on 14 November 2021. No additional consignments of this waste type were observed to have been received in WA's reporting or weighbridge records.	Non-compliant	It is recommended that WA continues to apply the Authorised Waste Storage Plan and Clinical Waste Receipt and Storage Plan developed in collaboration with the EPA.

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
Waste Recycling Investigation					
DA58	S3 C46	The Applicant shall investigate recycling options for ash and fume wastes and submit findings to Council and EPA within 12 months of the commissioning of the development, and every 12 months thereafter, until a feasible recycling alternative is found and implemented.	Progress with WA's investigation of recycling options has been reflected in Annual Environmental Management Reports. WA established the Alternative Materials Division in 2007 to profile ash and dust streams, develop viable reuse markets, and eliminate landfill disposal. Since peak landfilling in FY07 (10,991 tonnes), landfilling rates have been reduced to <500 tonnes per annum (FY11) and have remained low (typically <200 tpa) since. Ash beneficiation has recently been extended to Thermal Processing Facility bottom ashes.	Compliant	
DA59	S3 C47	The Applicant shall maximise on site waste recycling, in particular packaging materials, paper and any other such wastes.	WA is committed to maximising resource recovery and recycling rates. WA has an Alternative Materials Division (established in 2007) to beneficiate and divert process dusts from landfill for reuse as Alternative Materials in the manufacture of brick, tiles and cement. Mature markets established. Contracts and bins are also used to segregate and recycle Paper & Cardboard as well as Timber (pallet) wastes. Metals (ferrous and non-ferrous) are processed in-house for either remelt or on-trading. Commitment to resource recovery forms part of WA's Environment Policy.	Compliant	
FLORA AND FAUNA					
DA60	S3 C48	The Applicant shall not clear any native vegetation beyond the limits defined in Figure 4.1 of Additions to the Kurri Kurri Aluminium Refining and Recycling Facility - Volume II Construction Environmental Plan, prepared by URS and dated 23 April 2001.	WA reports no native vegetation clearing has occurred within the audit period. There were no signs of native vegetation clearing upon site inspection.	Compliant	
DA61	S3 C49	Clearing for the development shall be restricted to areas of the site covered by the Angophora/Stringybark/Grey Gum	Any clearing performed beyond that defined in CEMP has been performed in accordance with subsequent Modifications, and in	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		community. The Forest Red Gum, (Eucalyptus tereticornis) community shall be preserved for its habitat value and ecological significance.	consultation with NSWRFS / FRNSW as part of APZ establishment and maintenance. Previous audits also confirmed compliance.		
DA62	S3 C50	The Typha swamp in the north-western corner of the site and Swamp Creek (and its associated drainage lines) shall be protected from siltation by appropriate means detailed in the Erosion and Sediment Control Plan.	Auditors reviewed the Erosion and Sediment Control Plan, which is part of the CEMP. Wetland construction and maintenance was observed to be performed in accordance with the Erosion and Sediment Control Plan. Silt fencing has been established and maintained at the northern boundary at the steepest sloped location. NPWS confirmed entire Typha swamp would be retained in letter dated 5 June 1997. Page 15 of the Erosion, Sediment and Water Management Plan outlines erosion controls downstream of work areas prior to works commencement.	Compliant	
DA63	S3 C51	The Applicant shall implement a program to minimise the presence and spread of weeds, in particular camphor laurel, on the site.	WA's Weed Management Plan has a particular focus on Camphor Laurel, as required by this condition. The Weed Management Plan is laid out in a simple, easy to understand manner with appropriate controls provided. Auditors deemed the Weed Management Plan adequate and site inspection confirmed adequate implementation of the Weed Management Plan with no observed presence of Camphor Laurel.	Compliant	
ABORIGINAL CULTURAL HERITAGE					
DA64	S3 C52	In the event that Aboriginal objects are uncovered during the course of the development, the Applicant shall cease all works in the immediate areas, notify the EPA and implement any reasonable and feasible measures recommended by the EPA.	No Aboriginal objects have been uncovered during the audit period according to staff interviews and WA's annual compliance reporting.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
GREENHOUSE GAS					
Energy Savings Action Plan					
DA65	S3 C53	The Applicant shall prepare and implement an Energy Savings Action Plan for the development to the satisfaction of the Planning Secretary. This plan must be prepared in accordance with the requirements of the EPA and the Guidelines for Energy Savings Action Plans, DEUS 2005, and be submitted to the Planning Secretary for approval within six months from the commencement of DA-86-04-01-Mod 3.	WA has implemented routine Power Factor Correction checking and optimisation, installation of VSDs to various motors; routine burner tuning and optimisation; replacement of all hi-bay lighting with low-wattage LED; turning off lights and AC units after hours; identifying and eliminating compressed air leaks; and has installed pulse controllers on baghouses (for demand-based operation). Auditors sighted the Energy Saving Action Plan (ESAP), which was comprehensive and is being implemented in an ongoing fashion. It was recommended as part of the 2020 IEA that WA consider updating the ESAP. The ESAP has not yet been updated.	Compliant	
Monitoring and Reporting					
DA66	S3 C54	The Applicant shall, to the satisfaction of the Planning Secretary: a) monitor the greenhouse gas emissions generated by the development; b) investigate ways to reduce greenhouse gas emissions generated by the development; and c) report on greenhouse gas monitoring and abatement measures and energy efficiency measures identified in the Energy Savings Action Plan.	WA's Air Emissions Monitoring Reports sighted and available on website. Results are reported on in Compliance Report. WA investigates methods of reducing greenhouse gas emissions through the ESAP and associated initiatives. Examples of methods employed to reduce greenhouse gas emissions include transitioning to LED lighting, AC usage and leak maintenance. Progress on emissions reduction is monitored in conjunction with yearly NGER reporting. WA aims to achieve further greenhouse gas emission reduction via scrap melting furnace technology upgrades and heat exchanger/reuse projects.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			Auditors sighted WA's NGER Monitoring Summary spreadsheet for period 2012-current.		
EXTENDED SPENT POTLINING MATERIAL PROCESSING TRIAL					
Monitoring and Verification Reporting					
DA67	S3 C54A	For the duration of the DA-86-04-01 Mod 8, the Applicant must: a) monitor and record, air emissions, including cyanide, hydrogen cyanide, fluoride, particulates and all pollutants and parameters specified in the EPL; b) cease processing, and notify the EPA and the Planning Secretary, should laboratory results indicate emissions of cyanide are greater the limits in the EPL or the Protection of the Environment Operations (Clean Air) Regulation 2010; c) monitor and record all processing conditions for the trial, including: i. the quantity and characteristics of all inputs; ii. the processing methods, including the rotary furnace temperature profile and the duration of thermal treatment; and d) undertake real-time monitoring of fluoride and particulate emissions and immediately cease processing, and notify the EPA and the Planning Secretary, should any exceedance of the limits in the EPL occur.	Mod 8 trial was completed prior to the audit period.	Not triggered	
DA68	S3 C54B	The Applicant must prepare a detailed monitoring report, on the outcomes of DA-86-04-01 Mod 8, to the satisfaction of the EPA and the Planning Secretary. The report must: a) be submitted to EPA, Council and the Planning Secretary within 90 days of the completion of DA-86-04-01 Mod 8; b) detail the results of the monitoring required in condition 54A above;	Mod 8 trial was completed prior to the audit period.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		c) compare the results of the trial to, the limits in the EPL and the EPAs air quality impact assessment criteria specified in the "Approved Methods for the Modelling and Assessment of Air Pollutants in NSW" (DEC 2005); d) describe any anomalies in the monitoring data, and any exceedances of the limits or assessment criteria; e) characterise the trial outputs and describe how these products are to be managed and disposed of, demonstrating compliance with condition 44; f) summarise the findings of the trial; g) recommend any actions that could be taken to minimise emissions during any future processing; and h) discuss the likely options for any future processing.			
DA69	S3 C54C	For the duration of the DA 86-04-01 Mod 9, the Applicant must: a) monitor and record, air emissions and all pollutants and parameters specified in the EPL. All air quality monitoring must occur on a quarterly basis and whenever Pharmaceutical and Illicit Drug Waste material is being processed; b) ensure air quality emissions testing in completed in accordance with the EPA's Approved Methods for Sampling and Analysis of Air Pollutants in NSW c) cease processing, and notify the EPA and the Planning Secretary, should laboratory results indicate emissions are greater the limits in the EPL or the Protection of the Environment Operations (Clean Air) Regulation 2010; d) monitor and record all processing conditions for the trial, including: i. the names, contact details and qualifications and experience of the person(s) conducting and supervising the trial;	Mod 9 was completed prior to the audit period.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		ii. the source facility, a description of the waste type, amount and date received of each load of waste accepted for disposal as part of the trial; iii. all process conditions for the trial including the quantity of pharmaceutical and/or illicit drug waste in each batch processed, any other materials/additives processed in each batch, the temperature profile of the furnace during each batch processed and the residence time of the material within the furnace; and iv. undertake real-time monitoring of fluoride and particulate emissions and immediately cease processing, and notify the EPA and the Planning Secretary, should any exceedance of the limits in the EPL occur.			
DA70	S3 C54D	The Applicant must prepare a detailed monitoring report, on the outcomes of DA 86-04-01 Mod 9, to the satisfaction of the EPA and the Planning Secretary. The report must: a) be submitted to EPA, Council and the Planning Secretary within 90 days of the completion of DA 86-04-01 Mod 9; b) detail the results of the monitoring required in condition 54C above; c) compare the results of the trial to, the limits in the EPL and the EPA's air quality impact assessment criteria specified in the "Approved Methods for the Modelling and Assessment of Air Pollutants in NSW" (DEC 2005); d) describe any anomalies in the monitoring data, and any exceedances of the limits or assessment criteria; e) characterise the trial outputs and describe how these products are to be managed and disposed of, demonstrating compliance with condition 44;	Mod 9 was completed prior to the audit period.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		f) summarise the findings of the trial; g) recommend any actions that could be taken to minimise emissions during any future processing; and h) discuss the likely options for any future processing.			
Processing of Pharmaceutical and Illicit Drug Waste					
DA71	S3 C54E	Should approval be granted by the EPA in accordance with Condition 5C, liquid waste must be charged to the suitably hot furnace: a) after the molten aluminium is tapped out; and b) at the beginning of the next charge, prior to the addition of solid aluminium dross.	Approval was granted by the EPA during the Reporting Period (March 2023) and operations performed in accordance with 54C. This is reflected in updated version (9 Mar 2023) of EPL 6423.	Compliant	
DA72	S3 C54F	For the duration of the DA 86-04-01 Mod 12, the Applicant must monitor all processing conditions, the quantity and characteristics of all inputs and processing methods, including the rotary furnace operating profile and the duration of thermal treatment.	Auditors observed Rotary Furnace Operation Sheets which detailed processing conditions in accordance with Consents and EPL requirements.	Compliant	
DA73	S3 C54G	12 months after the commencement of operation of DA 86-04-01 Mod 12 the Applicant must prepare a detailed monitoring report, on the outcomes of operation, to the satisfaction of the Planning Secretary. The report must: a) detail the results of the monitoring required in condition 54F; and b) include a tracking summary of the implementation and monitoring of mitigation measures as listed under Hazards and Risk, Table 15 Summary of Management Measures of the EA and included in Appendix B	The Air Emissions Verification Report was submitted to the DPE and EPA in December 2020 and was subsequently approved by the DPE in March 2021. The report is in the process of being updated to reflect the new position of the stack.	Compliant	
SCHEDULE 4 - ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING					
ENVIRONMENTAL MANAGEMENT AND MONITORING					
Construction Environmental Management Plan					
DA74	S4 C55	The Applicant shall implement the following Plans for the development:		Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		a) Additions to the Kurri Kurri Aluminium Refining and Recycling Facility - Volume II Construction Environmental Management Plan, prepared by URS and dated 23 April 2001; b) Additions to the Kurri Kurri Aluminium Refining and Recycling Facility - Volume II Construction Environmental Management Plan Appendices, prepared by URS and dated 23 April 2001; and c) Construction Safety Study, prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 7 - Construction Safety Study Guidelines.			
DA75	S4 C55A	The Applicant must prepare and implement a Construction Environmental Management Plan for the duration of the construction of DA 86-04 01 Mod 14,	Auditors sighted and reviewed the Construction Environmental Management Plan (CEMP) for the Air Emissions Reconfiguration Project (DA 86-01-01 Mod 14). The CEMP was deemed comprehensive with all relevant management plans contained and prepared adequately. Site inspection confirmed proper implementation of the CEMP.	Compliant	
Operational Environmental Management Plan					
DA76	S4 C56	The Applicant shall update the following Plans/Studies to reflect the requirements of this consent and submit the amended Plans for the approval of the Planning Secretary within three months from the commencement of DA-86-04-01-Mod 3: a) Additions to the Kurri Kurri Aluminium Refining and Recycling Facility - Volume III Operational Environmental Management Plan, prepared by URS and dated 23 April 2001; b) Additions to the Kurri Kurri Aluminium Refining and Recycling Facility - Volume III Operational Environmental Management Plan Appendices, prepared by URS and dated 23 April 2001; c) Fire Safety Study prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper	Mod 3 completed prior to the audit period.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		No. 2 'Fire Safety Study Guidelines' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems. The study shall also be submitted to the NSW Fire Brigade for approval; d) Emergency Plan detailing emergency procedures for the development, including detailed procedures for the safety of people outside of the development who may be at risk from the development. The Emergency Plan must be prepared accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1 'Industry Emergency Planning Guidelines'; and e) Safety Management System covering all on-site operations and associated transport activities involving hazardous materials. The Safety Management System must specify all safety related procedures, responsibilities and policies, along with mechanisms for ensuring adherence to the procedures.			
DA77	S4 C56A	Within three months of each of the modifications listed below, the Applicant shall submit, for approval of the Planning Secretary, the relevant updated studies (as required by Condition 56 and described in table 5) to reflect the requirements of that modification. Modification: DA 86-04-01 Mod 7 — Plans: 56 c, d and e Modification: DA 86-04-01 Mod 9 — Plans: 56 d and e Modification: DA 86-04-01 Mod 12 — Plans: 56 d and e	Required actions taken prior to audit period.	Not triggered	
DA78	S4 C56B	The Applicant shall update the Safety Management System covering all on-site operations and security protocols for the storage, transport and incineration of pharmaceutical and illicit drug waste.	Latest copy of Weston Group Safety Management System (March 2023) was sighted by auditors at site inspection. The Safety Management System was deemed compliant by Advitech Pty Ltd in the 2023 Hazard Audit.	Compliant	
DA79	S4 C56C	Six months after the commencement of operation of DA 10397 of 1995 MOD 10, the Applicant shall submit to	Actions required were taken prior to audit period.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		the Planning Secretary, a report verifying that: a) the updated site Emergency Plan required under condition 56 is effectively in place; and b) the updated Safety Management System required under condition 56 has been fully implemented and that records required by the system are being kept.			
REPORTING AND AUDITING					
Incident Notification, Reporting and Response					
DA80	S4 C57	The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix C.	The Department was notified of the 14 November 2021 fire incident by email and via Major Projects Portal on 19 November 2021. Appendix C stipulates that the report must be submitted within 30 days. The full written report (prepared in accordance with Appendix C requirements) was submitted on 17 Dec 2021, outside the required 30 day period. WA has amended its compliance calendar to ensure no deadlines will be missed in future. Separate incidents occurred on the WA premises in July 2022 and July 2023. These incidents involved a molten metal spill and a fire. WA did not notify the DPE of these incidents due to interpretation of notification requirements and the definition of the term 'incident' under DA 86-04-01. WA liaised with the DPE to clarify the definition of an 'incident' and has now adopted the meaning of an incident as described in the POEO Act.	Non-compliant	No further action required.
Non-Compliance Notification					
DA81	S4 C58	The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance.	DPE was notified of the 14 November 2021 fire incident by email and via Major Projects Portal 19 November 2021.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			WA's routine compliance monitoring ensures compliance with this condition in the event of a separate non-compliance.		
DA82	S4 C59	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Auditors sighted the letter of notification to the DPIE following the 14 November 2021 fire incident. The letter was deemed compliant having identified the development (Weston Aluminium), application number in the title of the letter and all of the relevant details of the non-compliance/incident. The fire incident was treated as a non-compliance.	Compliant	
DA83	S4 C60	A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.		Noted	
Compliance Reporting					
DA84	S4 C61	Within three months after the first year of commencement of operation, and in the same month each subsequent year (or such other timing as agreed by the Planning Secretary), the Applicant must submit a Compliance Report to the Planning Secretary reviewing the environmental performance of the development to the satisfaction of the Planning Secretary. Compliance Reports must be prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2020) and must also: a) identify any trends in the monitoring data over the life of the development; b) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and c) describe what measures will be implemented over the next year to improve the environmental performance of the development.	Compliance Reports for the audit period are available on Weston Aluminium's website. Reports are satisfactory to the condition.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
DA85	S4 C63	The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Department and notify the Department in writing at least 7 days before this is done.	Compliance reports are publicly available on Weston Aluminium website.	Compliant	
Independent Audit					
DA86	S4 C64	Within one year of the commencement of operation, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must: a) be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020); b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and c) be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary).	This Independent Environmental Audit has been commissioned to satisfy this condition.	Compliant	
DA87	S4 C65	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must: a) review and respond to each Independent Audit Report prepared under condition 0 of this consent; b) submit the response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations; c) implement the recommendations to the satisfaction of the Planning Secretary; and d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before	This Independent Environmental Audit has been commissioned to satisfy this condition. It is noted that there was a delay to the initial audit following modification commencement due to COVID-19 disruption, causing the audit to occur after the required 52-week limit. WA elected to perform their audit program in advance after the initial non-compliance.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		this is done.			
DA88	S4 C66	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must: a) review and respond to each Independent Audit Report prepared under condition 65 of this consent; b) submit the response to the Department; and c) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Department and notify the Department in writing at least 7 days before this is done.	This Independent Environmental Audit has been commissioned to satisfy this condition	Compliant	
DA89	S4 C67	Twelve months after the commencement of DA 86-04-01 Mod 12 and every three years thereafter, or at such intervals as the Planning Secretary may agree, the Applicant must carry out a comprehensive Hazard Audit of the development and within one month of each audit submit a report to the satisfaction of the Planning Secretary for approval. The audits must be carried out at the Applicant's expense by a qualified person or team, independent of the development, approved by the Planning Secretary prior to commencement of the audit. Hazard Audits must be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit Guidelines'.	A hazard audit to the satisfaction of this condition has been commissioned and carried out separately to this audit.	Compliant	
DA90	S4 C68	Within one month of each audit carried out in accordance with Condition 54, the Applicant must submit a report to the satisfaction of the Planning Secretary for approval. The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented. The Applicant must implement the recommendations to the satisfaction of the Planning Secretary.	The audit report has been prepared and submitted to the satisfaction of this condition.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
Monitoring and Environmental Audits					
DA91	S4 C69	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing.		Noted	
ACCESS TO INFORMATION					
DA92	S4 C70	At least 48 hours before the commencement of construction until the completion of all works under this consent, the Applicant must: a) make the following information and documents (as they are obtained or approved) publicly available on its website: i. the documents referred to in condition 2 of schedule 2 of this consent; ii. all current statutory approvals for the development; iii. all approved strategies, plans and programs required under the conditions of this consent; iv. regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent; v. a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; vi. a summary of the current stage and progress of the development; vii. contact details to enquire about the development or to make a complaint; viii. a complaints register, updated monthly;	Mod 14 was completed in August 2022. Auditors inspected WA's website and found a suite of relevant documents including: i. The relevant documents referred to in S2C2 including most recent version of the EIS as modified, relevant site plans, the most recent conditions of approval and recent modification reports ii. All current statutory/regulatory approvals including EPL6423, The Consolidated Consent for Mods 1 through 14 and EHC Act Licence 119. iii. All approved strategies plans and programs including the AQMP, ESAP and OEMP. iv. Regular reporting including compliance reports, continuous emissions monitoring, noise monitoring, stormwater testing and air emissions. v. A comprehensive summary of monitoring is included in the annual compliance reports. vi. Current stage and progress summaries are available in the 'Development:	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		ix. the Compliance Report of the development; x. audit reports prepared as part of any Independent Audit of the development and the Applicant's response to the recommendations in any audit report; xi. any other matter required by the Planning Secretary; and b) keep such information up to date, to the satisfaction of the Planning Secretary.	Current Stage Mod 14 – COMPLETE' folder. vii. Contact details can be found under the 'Contact Us' tab. viii. The complaints register is available through the 'Register' folder. ix. Annual Compliance reports. x. All audit documentation. All document was observed to be up to date.		

S = Schedule
C = Condition

AUDIT CHECKLIST – WESTON ALUMINIUM 2020 IEA FINDINGS

AUDIT CHECKLIST – WESTON ALUMINIUM 2020 IEA FINDINGS 1

Table 1: Independent Environmental Audit Recommendations

Ref No.	Cond No.	Audit Recommendations	Action Taken	Status
A01	S2 C3	Ensure that waste materials are fully removed from the adjoining site, and that waste materials are not stored on adjoining sites in future. Notify the Department following the completion of removal of waste materials.	As confirmed in WA correspondence of 31 Jul 2020, materials stored on the adjacent Lot 62 were not wastes, and rather positive-value scrap inputs to Weston Aluminium's process. No actual or potential contamination or environmental harm occured. As per commitments made in WA's response to DPIE (31 Jul 2020) these materials have since been fully recovered. Waste materials will not be stored on the adjoining sites in future. Auditors viewed the adjoining site during inspection, there was no evidence of waste materials stored on the site.	Closed
A02	S2 C4	Ensure that future physical works, or commencement of operations consider the requirement for notification of the Department. Ensure that notifications to the Department are made before any future construction.	WA has updated its compliance calendar and internal compliance diary with relevant notification requirements. These documents were sighted by auditors and deemed comprehensive. It is evident that WA is making effort to ensure compliance and notification requirements are met going forward.	Closed
A03	S3 C13	Ensure that required timeframes for reporting are included in the site compliance calendar and that future compliance reporting is delivered by the due dates.	WA has reviewed and updated its internal compliance monitoring calendar to capture key reporting obligations. This internal monitoring tool is reviewed regularly to ensure that reporting commitments are achieved within the required timeframes. The compliance monitoring calendar was observed on site. Auditors noted the calendar dates back to 2012. This demonstrates that compliance requirements are captured and maintained. The calendar shows required tasks on a monthly basis to ensure compliance with conditions. The most recent compliance report was submitted 16 October 2023.	Closed
A04	S3 C13A	Review annual reporting periods and include in the site compliance calendar prior to the due date (16 August) to allow for delays and ensure that reporting is delivered on time.	Given the historically timely delivery of air emissions monitoring reports, WA did not anticipate reporting delays. Nevertheless, WA has amended its Compliance Calendar and is scheduling monitoring events early in each reporting period to ensure that future regulatory reporting deadlines are not compromised.	Closed
A05	S3 C16	Review operation of the scrap metal shredder to ensure that appropriate inspection of feed materials is undertaken to screen the quality of incoming materials. Review the need for	WA claims visible dust emissions observed during the 2020 Audit were attributed to the processing of some scrap materials recovered from the adjacent Lot 62, which contained excessive dirt as part of the material recovery process. The nature of these scrap materials are not	Closed

Ref No.	Cond No.	Audit Recommendations	Action Taken	Status
		implementation of additional dust mitigation measures.	representative of normal operations. Scrap materials delivered to site are inspected upon receipt to ensure that quality control requirements are satisfied. Any scrap materials found to contain excessive impurities (e.g. dirt, plastics, rubber, etc.) are typically returned to their point of origin. Existing dust suppression systems were sighted during site inspection and are deemed effective for dust suppression associated with typical scrap inputs and operations and will continue to be evaluated for effectiveness. Scrap shredders have been decommissioned since the previous audit. All incoming waste is subject to inspection as shown in weighbridge dockets. An outfeed spray system was installed following the 2020 IEA.	
A06	S3 C36	Upgrade the workshop flammable liquids cabinet to a compliant cabinet. Ensure all packaging and vessels are properly stored in accord with Australian Standards and adequately always labelled in relation to their contents- refer also to Hazard Audit.	WA has modified the existing Workshop DG Cabinet and has performed an audit of contents (Nov 2020). Specific upgrades include painting of the cabinet and labelling (DG Class 3 'Flammable Liquids') to more clearly display its function and associated hazards. A new suitable bund has been incorporated into the cabinet floor (bund capacity is now 40 L, which exceeds the AS1940 requirement of 110% of the largest container; 20L). WA reported in the 2020 IEA Action Register "containers found to be unlabelled and/or not incorporate appropriate lids were either rectified or otherwise disposed of appropriately." However, the 2023 Hazard Audit requires further upgrade of the cabinet to ensure compliance. The following recommendation was made: Install the sign AS 1940:2017 sign "NO SMOKING, NO IGNITION SOURCES WITHIN 3 m' in lettering at least 50 mm high and ensure all electrical devices within this radius are appropriately Ex rated. The store qualifies as a packaged Class 3 package store (cabinet) and must be shown on the Site Plan. Update the Manifest Site Plan to show the location of this store. The cabinet volume is above 250 L capacity and is therefore a Placard quantity store and must be included on the Hazardous Chemicals Manifest and notified to SafeWork NSW.	Open
A07	S3 C54G	Review annual reporting periods and include in the site compliance calendar prior to the due date (16 August) to allow for delays and ensure that reporting is delivered on time.	WA has amended its Compliance Calendar and seek to schedule monitoring events early in each reporting period to ensure that future regulatory reporting deadlines are not compromised. The compliance monitoring calendar dating back to 2012 was observed on site. This demonstrates that compliance requirements are captured and maintained. The calendar shows required tasks on a monthly basis to ensure compliance with conditions.	Closed

Ref No.	Cond No.	Audit Recommendations	Action Taken	Status
A08	S3 C62	The compliance monitoring and reporting program should be updated to reflect the deemed project commencement date of 16 August 2019.	This condition has been removed from consolidated consent. Regardless, compliance reports have since been prepared for the 16 Aug – 15 Aug annual reporting periods. The Compliance Reporting Program and the internal Compliance Calendar have been updated accordingly.	Closed
A14	L3.2	a. Ensure that preventative maintenance and inspection protocols are maintained for all pollution control devices to ensure optimal operation. b. Consult with the EPA to amend Annual Return template, enabling annual reporting of carbon monoxide monitoring summaries for Point 13.	a. The cyanide concentration reported for 16 Dec 2019 monitoring event has been investigated and was determined to be unrelated to plant operation. Mature preventative maintenance and routine inspections continue to remain in place. Following extensive consultation with the EPA, an increase in the regulatory limit from 0.5 to 0.8 mg/m3 has been approved to account for historical data variability and demonstrated via conservative dispersion modelling to remain well below ground-level assessment criteria. Monitoring frequency has also been increased to assess consistency with limit compliance. No further emission limit exceedances have occurred since. b. The EPA were made aware of the template issue and were to update the Annual Return tables as part of Licence anniversary review, however this has not yet occurred. WA to further consult with EPA regarding amendment of the Annual Return template during future licence variations. WA reports emissions monitoring data on its website (including CO) as part of its compliance requirements.	Open
A15	L3.3	Ensure that VOC analysis is conducted with averaging periods as required under the licence conditions.	WA raised the issue with AECOM November 5 2020. AECOM agreed to ensure that future VOC sampling intervals comply with licence requirements to enable a comparative assessment with limit criteria. The 2023 Compliance Report provides a comparison with limit criteria.	Closed
A16	O3.2	The Applicant shall implement all reasonable and feasible measures to minimise the dust generated by the development.	Dust production is not currently a concern for WA due to lowered processing rates, the partially enclosed nature of the shed and the implementation of appropriate dust mitigation measures. Effective dust management was observed on site by auditors including automated water spraying from the shed doors. The workshop was evidently swept.	Closed
A17	O5.5	Ensure that liquid chemicals and hazardous materials are stored correctly on appropriately designed containment, and that spills are thoroughly cleaned and removed to prevent ingress into the stormwater system.	As reported by WA in the 2020 IEA Action Register, all pallet-sized IBCs containing lubricants/coolants have been relocated into the bunded 20” container, and only 205L drum and smaller containers (10 and 20L containers) now stored on the half-width bunded pallets. The 205L drum is no longer stored on a timber pallet. Oil absorbent materials observed	Closed

Ref No.	Cond No.	Audit Recommendations	Action Taken	Status
			during the Audit inspection have since been recovered and disposed of appropriately. This was confirmed by auditors during site inspection.	
A18	O5.6	Review the oil separator and first flush system to ensure that appropriate high-level alarms, valves or other controls are installed and maintained to minimise the risk of overflow.	High-level alarms have been installed within the inground pits (at Oil/Water Separator and Main Pond) to alert staff in the unlikely event of a high-level condition (e.g. attributable to pump blockage / failure). Auditors inspected the oil separator during site inspection and found appropriate controls to be in place.	Closed
A22		The 2020 OEMP update has been updated to include the elements of the Thermal Waste Treatment Plant (TWTP). However, Condition 27 of DA86-04-01 requires the preparation and implementation of an Erosion and Sediment Control Plan, Site Rehabilitation Plan and Water Management Plan. These elements are not reflected in the current version of the OEMP but are understood to be part of the original CEMP for the original development. Subsequent reviews of the OEMP should ensure that relevant requirements from these plans are adequately addressed.	WA notes that the Erosion and Sediment Control Plan, Site Rehabilitation Plan and Water Management Plan are features of the CEMP for the original development. WA will review the opportunity to include relevant elements of these sub-plans into a subsequent OEMP revision and update. The OEMP has not yet been updated.	Open
A23		Condition 43 of DA86-04-01 requires the preparation of a Landscape Management Plan. Clearing has occurred since the development of this plan in accordance with the APZ approved by NSW RFS. It is recommended that this plan be updated, to ensure it is applicable to the site in its current state. DA 86-04-01 further requires implementation of a program to minimise the presence and spread of weeds, in particular camphor laurel (Cinnamomum camphora), on the site. These requirements should also be referenced or incorporated into the OEMP for the site.	WA reported in the 2020 IEA Action Register that they would review the opportunity to include an updated Landscape Management Plan and reference to its existing Weed Management Plan (SMEC, 2015), in a subsequent OEMP revision and update. WA liaises regularly with NSWRFS with respect to vegetation fuel-load management. Auditors sighted Asset protection Zone approval by NSW RFS. The RFS is satisfied that regular maintenance slashing can occur without ongoing APZ approval. WA claims slashing is performed in advance of the growing season following this approval. Following management successes (removal of 2 trees), no camphor laurel specimens exist on site, and camphor laurels are no longer considered an issue on site. The OEMP has not been updated further to April 2020.	Open
A24		The Energy Savings Action Plan was prepared to meet the consent requirements as verified under the previous audit, although this has not been reviewed since 2009. Gas and electricity consumption are under review and improved where applicable. It is recommended that this Action Plan is updated.	WA reported in the 2020 IEA Action Register that they had replaced site-wide lighting with LEDs, installed VSDs, upgraded plant and equipment technologies and has installed sub-metering throughout the site. WA continues to seek continuous improvement opportunities with respect to energy efficiencies, and continues to apply elements of the 2009 ESAP to changing site operations (i.e. as plant and equipment items are replaced /	Open

Ref No.	Cond No.	Audit Recommendations	Action Taken	Status
			upgraded). Energy consumption and efficiencies are monitored and reported annually, demonstrating a trending reduction in energy consumption and GHG rates per unit of production. The ESAP has not been required to be updated since its original version.	
A25		A first flush system, incorporating gross pollutant traps in stormwater pits is maintained to prevent the risk of water pollution from the site. While stormwater pits, gross pollutant traps and the first flush dam are included on regular inspection program and the MEX maintenance system, observations on site indicated that many of the stormwater pits were full of sediment, and the first flush dam was full of sediment. It is noted that the first flush dam was cleaned following the audit on the 9th and 10th September 2020. The stormwater pits, gross pollutant traps and the first flush dam should be inspected regularly, and cleaning and maintenance works should be conducted based on their condition.	WA has reviewed its Preventative Maintenance system to ensure that stormwater pit inspections and maintenance (e.g. sediment recovery and removal) frequencies are appropriate. As noted by the Auditor, sediment accumulations within the first flush dam have since been removed (earlier delayed due to wet weather and contractor availability limitations). WA reported in the 2020 IEA Action Register that they would seek to arrange dam cleaning events with further notice in future to ensure that these maintenance events can occur in a timely manner. WA reports that the most recent dam cleaning event was conducted in July 2022. Dam cleaning is undertaken as needed and is listed on the weekly enviro inspection checklist. Contractors are utilised to extract and clean pits as needed.	Closed
A26		The site inspection identified substantial items of equipment, empty IBCs and other materials stored behind the maintenance workshop and behind the Aldex building adjacent to the Administration building. These areas should be maintained and excess materials removed to minimise the risk of soil contamination, accumulation of combustible materials and to enhance the site amenity.	WA has since removed extraneous items (e.g. empty IBCs) from these areas. Other plant and equipment are stored as part of routine maintenance and operation (e.g. new tyres) and future project activities (e.g. structural steel, aluminium sheeting). WA agreed that these items would be stored in a manner that maintains an acceptable housekeeping standard. Site inspection confirmed that these type of items are not currently stored on site.	Closed

AUDIT CHECKLIST – EPL 6423

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Table 1 EPL 6423

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
1 Administrative Conditions					
A1 What the licence authorises and regulates					
EPL01	A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. **Scheduled Activity** / **Fee Based Activity** / **Scale** Metallurgical activities / Aluminium production (scrap metal) / > 10000 T annual production capacity Resource recovery / Recovery of hazardous and other waste / Any hazardous and other waste recovered Metallurgical activities / Scrap metal processing / 0 - 100000 T annual production capacity Waste disposal (thermal treatment) / Thermal treatment of general waste / Any capacity Waste disposal (thermal treatment) / Thermal treatment of hazardous and other waste / Any capacity Waste storage / Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste / Any listed waste type stored	The scheduled activities and scales listed remain appropriate for operations that were observed to be occurring at the site. No exceedances were reported in WA's annual compliance reports during the audit period, nor were any exceedances observed in weighbridge records sighted by auditors.	Compliant	
A2 Premises or plant to which this licence applies					
EPL02	A2.1	The licence applies to the following premises: **Premises Details** **WESTON ALUMINIUM** **129 MITCHELL AVENUE** **KURRI KURRI** **NSW 2327** **LOT 2; DP 1267615.**		Noted	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
A3 Information supplied to the EPA					
EPL03	A3.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.		Noted	
EPL04	A3.2	Any other document and/or management plan is not to be taken as part of the documentation in condition A3.1, other than those documents and/or management plans specifically referenced in this licence.		Noted	
2 Discharges to Air and Water and Applications to Land					
P1 Location of monitoring/discharge points and areas					
EPL05	P1.1	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.		Noted	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		Air EPA Identification no. / Type of Monitoring Point / Type of Discharge Point / Location Description 1 — Discharge to air, Air emissions monitoring / Discharge to air, Air emissions monitoring / Wet-Dry Lime-Fed Scrubber and Fabric Filter Baghouse No. 1 (servicing the No. 2 Rotary Furnace), marked and shown as "Stack 1" on the "EPA Monitoring Locations Plan". 2 — Discharge to air, Air emissions monitoring / Discharge to air, Air emissions monitoring / Fabric Filter Baghouse No. 2 (servicing the Dross Storage Bays), marked and shown as "Stack 2" on the "EPA Monitoring Locations Plan". 3 — Discharge to air, Air emissions monitoring / Discharge to air, Air emissions monitoring / Fabric Filter Baghouse No. 3 (servicing the Metal Reclaiming Machine, Cooler and Screens), marked and shown as "Stack 3" on the "EPA Monitoring Locations Plan". 4 — Discharge to air, Air emissions monitoring / Discharge to air, Air emissions monitoring / Fabric Filter Baghouse No. 4 (servicing the Metal Reclaiming Machine, Cooler and Screens), marked and shown as "Stack 4" on the "EPA Monitoring Locations Plan". 13 — Discharge to air, Air emissions monitoring / Discharge to air, Air emissions monitoring / Wet-Dry Lime-Fed Scrubber and Fabric Filter Baghouse No. 1 (servicing the Charging/Side Well of the Reverberatory Furnace), marked and shown as "Stack 1" on the "EPA Monitoring Locations Plan". 14 — Discharge to air, Air emissions monitoring / Discharge to air, Air emissions monitoring / Direct vent of clean combustion gases (servicing the Holding Side of the Reverberatory Furnace), marked and shown as "Stack 6" on the "EPA Monitoring Locations Plan". 16 — Discharge to air / By-pass Stack (servicing the Thermal Waste Treatment Plant), marked and shown as "Stack 8" on the "EPA Monitoring Locations Plan". 17 — Discharge to air, Air emissions monitoring / Discharge to air, Air emissions monitoring / Dry Lime and Activated Carbon Fed Scrubber and Fabric Filter Baghouse No. 5 (servicing the Thermal Waste Treatment Plant), marked and shown as "Stack 5" on the "EPA Monitoring Locations Plan". 18 — Discharge to air, Air emissions monitoring / Discharge to air, Air emissions monitoring / Fabric Filter Baghouse No. 7 (servicing the Pre-Processing Plant, Dross Storage Bays (Aldex Building)), marked and shown as "Stack 7" on the "EPA Monitoring Locations Plan".			
EPL06	P1.2	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.		Noted	
EPL07	P1.3	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. *Water and land* EPA Identification no. / Type of Monitoring Point / Type of Discharge Point / Location Description 12 — Stormwater quality monitoring / Discharge from the first flush dam marked and shown as "Main Pond" on the "EPA Monitoring Locations Plan"		Noted	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
EPL08	P1.4	For the purpose of the tables above, "EPA Monitoring Location Plan" refers to the plan titled "EPA Monitoring Locations", prepared by AECOM Australia Pty Ltd, emailed to the EPA on 3/8/2022 (EPA ref. DOC22/676151).		Noted	
3 Limit Conditions					
L1 Pollution of waters					
EPL09	L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Annual water quality monitoring is performed at Main Pond discharge point (Point 12) in accordance with EPL requirements, evident in Annual Returns. Between 2012 and the November 2021 fire event, treated first flush waters (removal of particulates, metals, nutrients and oil & grease) were reused on site for irrigation purposes. WA has reported no direct discharges to the environment as a result of operational activities. In response to the November 2021 fire event, and as requested by EPA, site flows were directed to the Main Pond and the former first flush by-pass service was isolated to prevent discharge of stormwaters to the environment. Contained stormwaters were recovered by tanker for offsite discharge (interim arrangement), and subsequently disposed of to Trade Waste following consultation with Hunter Water. This post-fire configuration (capture and containment of all site flows (clean and potentially dirty), followed by Trade Waste discharge, has been maintained by WA. However, probable discharges of firefighting water and foam were reported to have occurred during the fire on 14 and 15 November 2021. The discharge is	Non-compliant	The discharges to the Swamp Creek catchment were a result of response to an emergency incident. WA has reconfigured its stormwater system in response to the incident. No further corrective actions are required.

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			likely to have occurred to the Swamp Creek catchment through the headwall outlet to the north of the site. It is noted that the discharge was the result of the response to an emergency. Auditors reviewed the Site Drainage Report (Royal HaskoningDHV, 2022) which verifies the reconfigured surface water management post 2021 fire incident. The original dam capacity was 650m³. This has now been increased to 2,900m³. Auditors discovered no further signs of water pollution during site inspection.		
L2 Load limits					
EPL10	L2.1	The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutant in the table below.	Auditors sighted WA's Annual Returns for the audit period. Annual Returns showed no exceedances of the load limits shown in the table below.	Compliant	
EPL11	L2.2	The actual load of an assessable pollutant must be calculated in accordance with the relevant load calculation protocol. **Assessable Pollutant** **Load limit (kg)**	As above.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		Arsenic (Air) Benzene (Air) Benzo(a)pyrene (equivalent) (Air) Coarse Particulates (Air) 8768.00 Fine Particulates (Air) 5099.00 Fluoride (Air) 865.00 Lead (Air) Mercury (Air) Nitrogen Oxides (Air) 20481.00 Sulfur Oxides (Air) 16986.00 Volatile organic compounds (Air) 2436.00 Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence.			
L3 Concentration limits					
EPL12	L3.1	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.	The following comments are a result of cross referencing the annual return and air emissions monitoring data for the audit period with the Air Concentration Limits table: **Point 1** Gaseous fluoride – compliant Type 1 and Type 2 substances in aggregate – compliant Cyanide – It is noted that the 2021-22 Annual Return states 2 samples were required while only one sample has been taken. It is the auditors understanding that Cyanide monitoring is to be undertaken at intervals determined by 'Special Frequency 2', which requires monitoring twice yearly once liquid processing of	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			pharmaceutical/illicit drug waste has commenced. The November fire incident damaged monitoring equipment which has since been reinstated. Annual monitoring was still undertaken hence the 1 sample during the reporting period. This monitoring found cyanide concentration to be compliant. Dioxins and Furans – Compliant Carbon monoxide – compliant Sulfuric acid mist and sulfur trioxide – compliant Solid particles – compliant Hydrogen chloride – compliant Nitrogen oxides – compliant Cadmium - compliant **Note: Points 2 and 3 have been decommissioned, no monitoring required.** **Point 4** Solid particles – compliant **Point 13** VOC – Compliant Carbon monoxide – data not found Nitrogen oxides – compliant Dioxins and Furans – compliant Cadmium – compliant Hydrogen chloride – compliant Solid particles - compliant Sulfuric acid mist and sulfur trioxide – compliant		

<table>
<tr><th>Ref No.</th><th>Cond No.</th><th>Audit Finding & Recommendations</th><th>Comments & Evidence</th><th>Audit Findings</th><th>Recommendations</th></tr>
<tr><td></td><td></td><td></td><td>Type 1 and Type 2 substances in Aggregate – compliant

Point 14
Solid particles – compliant

Point 17
This point is related to the thermal waste treatment plant, subject to SSD 7396.

Point 18
Solid particles - compliant</td><td></td><td></td></tr>
<tr><td>EPL13</td><td>L3.2</td><td>Air Concentration Limits
POINT 1
<table>
<tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr>
<tr><td>Gaseous fluoride</td><td>milligrams per cubic metre</td><td>2</td><td>Dry, 273K, 101.3kPa</td><td></td><td>1 hour (see condition L3.3)</td></tr>
<tr><td>Type 1 and Type 2 substances in aggregate</td><td>milligrams per cubic metre</td><td>1</td><td>Dry, 273K, 101.3kPa</td><td></td><td>1 hour (see condition L3.3)</td></tr>
<tr><td>Cyanide</td><td>milligrams per cubic metre</td><td>0.8</td><td>Dry, 273K, 101.3kPa</td><td></td><td>1 hour (see condition L3.3)</td></tr>
<tr><td>Dioxins & Furans</td><td>nanograms per cubic metre</td><td>0.1</td><td>Dry, 273K, 101.3kPa</td><td></td><td>2 hours</td></tr>
<tr><td>Carbon monoxide</td><td>milligrams per cubic metre</td><td>125</td><td>Dry, 273K, 101.3kPa</td><td></td><td>1 hour rolling</td></tr>
<tr><td>Sulfuric acid mist and sulfur trioxide (as SO3)</td><td>milligrams per cubic metre</td><td>30</td><td>Dry, 273K, 101.3kPa</td><td></td><td>1 hour (see condition L3.3)</td></tr>
<tr><td>Solid Particles</td><td>milligrams per cubic metre</td><td>25</td><td>Dry, 273K, 101.3kPa</td><td></td><td>1 hour (see condition L3.3)</td></tr>
<tr><td>Hydrogen chloride</td><td>milligrams per cubic metre</td><td>50</td><td>Dry, 273K, 101.3kPa</td><td></td><td>1 hour (see condition L3.3)</td></tr>
<tr><td>Nitrogen Oxides</td><td>milligrams per cubic metre</td><td>200</td><td>Dry, 273K, 101.3kPa</td><td></td><td>1 hour block</td></tr>
<tr><td>Cadmium</td><td>milligrams per cubic metre</td><td>0.02</td><td>Dry, 273K, 101.3kPa</td><td></td><td>1 hour (see condition L3.3)</td></tr>
</table>
POINT 2
<table>
<tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr>
<tr><td>Solid Particles</td><td>milligrams per cubic metre</td><td>35</td><td>Dry, 273K, 101.3kPa</td><td></td><td>1 hour (see condition L3.3)</td></tr>
</table></td><td>As above.</td><td>Compliant</td><td></td></tr>
</table>

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations

POINT 3

Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period
Solid Particles	milligrams per cubic metre	50	Dry, 273K, 101.3kPa		1 hour (see condition L3.3)

POINT 4

Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period
Solid Particles	milligrams per cubic metre	24	Dry, 273K, 101.3kPa		1 hour (see condition L3.3)

POINT 13

Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period
Volatile organic compounds	milligrams per cubic metre	77	Dry, 273K, 101.3kPa		1 hour rolling
Carbon monoxide	milligrams per cubic metre	125	Dry, 273K, 101.3kPa		1 hour rolling
Nitrogen Oxides	milligrams per cubic metre	100	Dry, 273K, 101.3kPa		1 hour block
Dioxins & Furans	nanograms per cubic metre	0.1	Dry, 273K, 101.3kPa		2 hours
Cadmium	milligrams per cubic metre	0.02	Dry, 273K, 101.3kPa		1 hour (see condition L3.3)
Hydrogen chloride	milligrams per cubic metre	10	Dry, 273K, 101.3kPa		1 hour (see condition L3.3)
Solid Particles	milligrams per cubic metre	10	Dry, 273K, 101.3kPa		1 hour (see condition L3.3)
Sulfuric acid mist and sulfur trioxide (as SO3)	milligrams per cubic metre	30	Dry, 273K, 101.3kPa		1 hour (see condition L3.3)
Type 1 and Type 2 substances in aggregate	milligrams per cubic metre	1	Dry, 273K, 101.3kPa		1 hour (see condition L3.3)

POINT 14

Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period
Solid Particles	milligrams per cubic metre	10	Dry, 273K, 101.3kPa	15%	1 hour (see condition L3.3)

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		POINT 17 Pollutant / Units of measure / 100 percentile concentration limit / Reference conditions / Oxygen correction / Averaging period volatile organic compounds as n-propane equivalent / milligrams per cubic metre / 20 / Dry, 273K, 101.3kPa / 11% / 1 hour rolling Hydrogen chloride / milligrams per cubic metre / 50 / Dry, 273K, 101.3kPa / 11% / 1 hour (see condition L3.3) Solid Particles / milligrams per cubic metre / 20 / Dry, 273K, 101.3kPa / 11% / 1 hour (see condition L3.3) Sulfuric acid mist and sulfur trioxide (as SO3) / milligrams per cubic metre / 80 / Dry, 273K, 101.3kPa / 11% / 1 hour (see condition L3.3) Type 1 and Type 2 substances in aggregate / milligrams per cubic metre / 1.0 / Dry, 273K, 101.3kPa / 11% / 1 hour (see condition L3.3) Cadmium / milligrams per cubic metre / 0.18 / Dry, 273K, 101.3kPa / 11% / 1 hour (see condition L3.3) Mercury / milligrams per cubic metre / 0.2 / Dry, 273K, 101.3kPa / 11% / 1 hour (see condition L3.3) Nitrogen Oxides / milligrams per cubic metre / 200 / Dry, 273K, 101.3kPa / 11% / 1 hour block Dioxins & Furans / nanograms per cubic metre / 0.1 / Dry, 273K, 101.3kPa / 11% / 2 hours Sulfur dioxide / milligrams per cubic metre / 200 / Dry, 273K, 101.3kPa / 11% / 1 hour block Carbon monoxide / milligrams per cubic metre / 62.5 / Dry, 273K, 101.3kPa / 11% / 1 hour rolling POINT 18 Pollutant / Units of measure / 100 percentile concentration limit / Reference conditions / Oxygen correction / Averaging period Solid Particles / milligrams per cubic metre / 15 / Dry, 273K, 101.3kPa / / 1 hour (see condition L3.3)			
EPL14	L3.3	The Averaging Period is 1 hour, or the minimum sampling period specified in the relevant test method referred to in Part 1, Division 1 of the Protection of the Environment Operations (Clean Air) Regulation 2022, whichever is the greater. Note: The EPA intends to review the concentration limit for Volatile Organic Compounds for Point 17 based on the results from the Post Commissioning Verification Monitoring and Report.	Averaging periods were determined to be compliant based on review of sampling methodology in Annual Emissions Testing Report and Annual Returns.	Compliant	
EPL15	L3.4	The concentration of gaseous fluoride emitted to the atmosphere from Point 1 must not exceed 1.4 milligrams per cubic metre of fluoride, measured as a one hour average.	Gaseous Fluoride Continuous Emissions Monitoring Results are available on Weston Aluminium website, evidently measured as a one-hour average. No	Compliant	

<table>
<tr><th>Ref No.</th><th>Cond No.</th><th>Audit Finding & Recommendations</th><th>Comments & Evidence</th><th>Audit Findings</th><th>Recommendations</th></tr>
<tr><td></td><td></td><td></td><td>exceedances occurred within the audit period.</td><td></td><td></td></tr>
<tr><td>EPL16</td><td>L3.5</td><td>Total plant gaseous fluoride emissions must not exceed 0.25kg/hr.</td><td>No exceedances occurred during the audit period according to WA's emissions monitoring reports during the audit period.</td><td>Compliant</td><td></td></tr>
<tr><td>EPL17</td><td>L3.6</td><td>Total plant particulate emissions must not exceed 5.43 kg/hour.</td><td>No exceedances were recorded within the audit period according to WA's annual reports for the audit period.</td><td>Compliant</td><td></td></tr>
<tr><td colspan="6">L4 Waste</td></tr>
<tr><td>EPL18</td><td>L4.1</td><td>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.
<table>
<tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr>
<tr><td>NA</td><td>Clinical and related waste</td><td>Pathogenic substances only</td><td>Waste disposal (thermal treatment)
Waste storage</td><td>May only be processed in the Thermal Waste Treatment Plant</td></tr>
<tr><td>R120</td><td>Waste pharmaceuticals, drugs and medicines</td><td></td><td>Waste disposal (thermal treatment)
Waste storage</td><td>May only be processed in the Thermal Waste Treatment Plant</td></tr>
<tr><td>NA</td><td>Glass, plastic, paper or cardboard</td><td>Paper documents only</td><td>Waste disposal (thermal treatment)
Waste storage</td><td>May only be processed in the Thermal Waste Treatment Plant</td></tr>
<tr><td>J100</td><td>Waste mineral oils unfit for their original intended use</td><td>Oily rags only</td><td>Waste disposal (thermal treatment)
Waste storage</td><td>May only be processed in the Thermal Waste Treatment Plant</td></tr>
</table></td><td>Auditors sighted waste tracking sheets provided by WA.
WA's tracking and inspection system, observed during site inspection, ensures that no waste outside of the definitions, related activities and other limits provided in the table is processed on site.
No evidence of improper waste processing was observed during desktop or site inspection.
However, it was reported in the 2020-2021 Annual Return that hand sanitiser wastes were received, stored and processed in rotary furnaces between 22 June 2021 and 18 December 2021.
The hand sanitiser waste is classified as non-liquid pharmaceutical waste.
WA followed NSW EPA direction to repackage and remove the remaining hand sanitiser waste from site 10 January 2022.
WA's 'Action Register – November 2021 Fire Incident & Other Related Matters' contains a review of historical communications, which was reviewed by auditors. This documentation confirmed that WA ceased processing of hand</td><td>Non-compliant</td><td>WA followed NSW EPA directions to repackage and remove the remaining waste that had not yet been processed from the site. It is recommended that all waste types are classified correctly before processing in future. Ensure all staff are familiar with NSW EPA Waste Classification Guidelines 2014.</td></tr>
</table>

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			sanitiser waste once becoming aware of the non-compliance and donated the remaining stock for reuse.		

J160	Waste tarry residues	Pitch sludge residues only	Waste disposal (thermal treatment) Waste storage	May only be processed in the Thermal Waste Treatment Plant
J120	Waste oil/hydrocarbons mixtures/emulsions in water	Pitch sludge residues only	Waste disposal (thermal treatment) Waste storage	May only be processed in the Thermal Waste Treatment Plant
G160	Waste from the production, formulation, and use of organic solvents	Solvents and paints only	Waste disposal (thermal treatment) Waste storage	May only be processed in the Thermal Waste Treatment Plant
G150	Halogenated organic solvents	Solvents and paints only	Waste disposal (thermal treatment) Waste storage	May only be processed in the Thermal Waste Treatment Plant
G110	Organic solvents excluding halogenated solvents	Solvents and paints only	Waste disposal (thermal treatment) Waste storage	May only be processed in the Thermal Waste Treatment Plant
F110	Waste resin, latex, plasticiser, glue & adhesive	Solvents and paints only	Waste disposal (thermal treatment) Waste storage	May only be processed in the Thermal Waste Treatment Plant
F100	Waste ink, dye, pigment, paint, lacquer & varnish	Solvents and paints only	Waste disposal (thermal treatment) Waste storage	May only be processed in the Thermal Waste Treatment Plant
T100	Waste chemical substances arising from research and development or teaching activities, including those that are not identified and/or are new and whose effects on human health and/or the environment are not known		Waste disposal (thermal treatment) Waste storage	May only be processed in the Thermal Waste Treatment Plant
R150	Quarantine Waste		Waste disposal (thermal treatment) Waste storage	May only be processed in the Thermal Waste Treatment Plant
R140	Waste from the production & preparation of pharmaceutical products		Waste disposal (thermal treatment) Waste storage	May only be processed in the Thermal Waste Treatment Plant
R130	Cytotoxic		Waste disposal (thermal treatment) Waste storage	May only be processed in the Thermal Waste Treatment Plant
R100	Clinical and related wastes		Waste disposal (thermal treatment) Waste storage	May only be processed in the Thermal Waste Treatment Plant

Ref No.	Cond No.	Audit Finding & Recommendations					Comments & Evidence	Audit Findings	Recommendations
		R120	Waste pharmaceuticals, drugs and medicines	Illicit drug and pharmaceutical waste	Waste disposal (thermal treatment) Waste storage	Combined total quantity of aluminium dross, spent pot lining, illicit drug and pharmaceutical waste must not exceed 5,000 tonnes stored on the premises at any time; and, no more than a combined total of 40,000 tonnes of aluminium dross, spent pot lining, illicit drug and pharmaceutical waste in any combination is to be processed per year. No more than 2,000 tonnes of pharmaceutical waste and no more than 5 tonnes of illicit drug waste is to be processed per year in the Rotary Furnace.			
		NA	Scrap metal	Scrap aluminium metal	Metallurgical Activities	No more that 35,000 tonnes of scrap metal is to be processed per year.			
		D100	Metal carbonyls	Spent potlining wastes from Australian primary aluminium smelters	Waste processing (non-thermal treatment) Waste storage	Combined total quantity of aluminium dross, spent pot lining, illicit drug and pharmaceutical waste must not exceed 5,000 tonnes stored on the premises at any time; and, no more than a combined total of 40,000 tonnes of aluminium dross, spent pot lining, illicit drug and pharmaceutical waste in any			

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations

				combination is to be processed per year.
A130	Cyanides (inorganic)	Spent potlining material wastes from Australian primary aluminium smelters	Waste processing (non-thermal treatment) Waste storage	Combined total quantity of aluminium dross, spent pot lining, illicit drug and pharmaceutical waste must not exceed 5,000 tonnes stored on the premises at any time; and, no more than a combined total of 40,000 tonnes of aluminium dross, spent pot lining, illicit drug and pharmaceutical waste in any combination is to be processed per year.
D300	Non toxic salts	Aluminium Dross	Waste storage Waste processing (non-thermal treatment)	Combined total quantity of aluminium dross, spent pot lining, illicit drug and pharmaceutical waste must not exceed 5,000 tonnes stored on the premises at any time; and, no more than a combined total of 40,000 tonnes of aluminium dross, spent pot lining, illicit drug and pharmaceutical waste in any combination is to be processed per year.

EPL19	L4.2	The licensee must not process a combined total of more than 8,000 tonnes per year of the following wastes in the Thermal Waste Treatment Plant. • Clinical and related waste (Waste Code R100); • Pathogenic substances (Waste Code R110); • Waste pharmaceuticals, drugs and medicines (Waste Code R120); • Cytotoxic substances (Waste Code R130);	This condition is relevant to SSD7396 (not relevant to DA 86-04-01) and will be assessed in a separate IEA.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		• Waste from the production and preparation of pharmaceutical products (Waste Code R140); • Quarantine waste (Waste Code R150); • Waste chemical substances arising from research and development or teaching activities, including those that are not identified and/or are new and whose effects on human health and/or the environment are not known (Waste Code T100); • Solvent and paints (Waste Codes F100, F110, G110, G150 and G160); • Pitch sludge residues (Waste Codes J120 and J160); • Oily rags (Waste Code J100); and • Paper documents.			
L5 Noise Limits					
EPL20	L5.1	Truck movements to and from the premises must only be undertaken between the hours of 7am and 10pm.	Auditors sighted weighbridge records produced upon request by WA. No truck movements occurred between 10pm and 7am.	Compliant	
EPL21	L5.2	Noise from the premises must not exceed the noise limits presented in the table below. Note: Where amenity noise levels are lower than intrusive noise levels, both levels are in the licence condition in order to ensure that intrusive noise impacts are controlled at all times. **Location** / **Daytime** / **Evening** / **Night time** Residences at the corner of Government and 10th Streets / LAeq(15 minute) 48 dB(A) / LAeq(15 minute) 48dB(A), LAeq(evening) 40dB(A) / LAeq(15 minute) 47dB(A), LAeq(night) 35dB(A), LAeq(1 minute) 57dB(A) Residences on Northcote Street / LAeq(15 minute) 44dB(A) / LAeq(15 minute) 44dB(A) / LAeq(15 minute) 44 dB(A), LAeq(night) 40dB(A), LAeq(1 minute) 57dB(A) Residences in the Light Industrial Zone on Mitchell Avenue and Railway Avenue / LAeq(15 minute) 43dB(A) / LAeq(15 minute) 43dB(A) / LAeq(15 minute) 43dB(A), LAeq(night) 41dB(A), LAeq(1 minute) 55dB(A)	WA was deemed to be compliant by technical specialists in the most recent noise compliance study – 'Noise Compliance Study, October 2021 Weston Aluminium' (Spectrum Acoustics), available on WA website. There have been no community complaints that can be attributable to WA operations since the noise compliance study was conducted.	Compliant	
L6 Potentially Offensive Odour					
EPL22	L6.1	No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.	Although 4 complaints regarding odour were submitted within the audit period, all complaints were investigated and none	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	were attributable to WA operations. WA reports in the 2022 Compliance Report "WA was either non-operational at the time of the complaint observations, or otherwise was positioned downwind of the complainant. No operational or maintenance issues were experienced, nor were any odours observed on each occasion."		
L7 Other limit conditions					
EPL23	L7.1	The licensee must comply with the conditions as specified in this licence or where no specific conditions are outlined in this licence, the licensee must comply with the "Chemical Control Order in Relation to Aluminium Smelter Wastes containing Fluoride and/or Cyanide, 1986".	Administrative non-compliance triggered by non-compliances relevant to other conditions of the EPL.	Non-compliant	Follow recommendations against non-compliances to ensure compliance with the EPL going forward.
4 Operating Conditions					
O1 Activities must be carried out in a competent manner					
EPL24	O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Internal Environmental Awareness training is delivered to all site personnel (employees and labour-hire). Auditors sighted Environmental Awareness training presentation, which contained relevant information such as environmental responsibilities, incident response procedures, etc. This is accompanied by a more specific Thermal Processing Facility Environmental Awareness Training presentation. Auditors also viewed Environmental Awareness Training Records showing staff attendance at training events.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
O2 Maintenance of plant and equipment					
EPL25	O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	WA employ MEX (Maintenance Experts) Database for plant asset maintenance. Schedules (frequency) and Work Orders are worked out using this system. Auditors sighted preventative maintenance orders. WA ensure all plant and equipment is operated in a competent manner through their 'First 10 Shifts' process, where on the job competency training is provided on the production floor. Auditors sighted the Individual Induction Plan which forms the 'First 10 Shifts' process.	Compliant	
O3 Dust					
EPL26	O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	WA's AQMP provides a comprehensive list of mitigation measures and implementation timeframes ensuring minimisation/prevention of dust from the premises. Such measures include 3 monthly mechanical inspections, weekly lubrication, monthly electrical inspection and more, displayed in Table 8 of the AQMP. No visible dust emissions were observed during site inspection. Auditors observed water spraying and extraction measures in place and operating during site inspection.	Compliant	
EPL27	O3.2	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	One dust-related complaint was submitted to WA in the audit period. This complaint was determined by WA to be a result of smoke from the baghouse fan overheating/shutdown incident. This incident involved the feeding of a bale of contaminated waste into the reverberatory furnace. The increase in temperature	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			caused an emergency over temperature shutdown. Operators reported that they immediately ceased feeding the furnace and restarted the baghouse fan to improve ventilation. The incident was dealt with competently by WA. Generally, operations at the premises were observed to be conducted in a manner that minimises dust emissions. Dust emissions are generally of low concern at the premises due to lowered production and decommissioning of shredders. Auditors observed water spraying and extraction measures in place and operating during site inspection.		
EPL28	O3.3	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	WA staff were observed to continuously monitor adherence to National Heavy Vehicle Regulator Requirements on ingoing and outgoing trucks, including checking for proper load coverage. Cameras on weighbridge show staff whether loads are covered and would be rejected if uncovered. Clinical waste is received in semi-trailers, dross is received in covered bins. Pot bottoms are in covered vehicles.	Compliant	
O4 Processes and Management					
EPL29	O4.1	All process water, leachate (water that has percolated through a solid including waste), and any stormwater that is contaminated by activities carried on at the Premises must be disposed of to trade waste (i.e, must not be disposed of or discharged to the environment) or another means that achieves the same outcome (E.g. collected and tankered offsite).	In response to the November 2021 fire event and as requested by EPA, all site flows were directed to the Main Pond and the former first flush by-pass service was isolated to prevent discharge of stormwaters to the environment. Contained stormwaters were recovered by tanker for offsite discharge (interim arrangement), and subsequently disposed of to Trade Waste following consultation	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
			with Hunter Water. This post-fire configuration (capture and containment of all site flows (clean and potentially dirty), followed by Trade Waste discharge, has been maintained by WA. Auditors observed WA's water discharge configuration during site inspection.		
O5 Waste Management					
EPL30	O5.1	The licensee must ensure that any liquid and/or non liquid waste generated and/or stored at the premises is assessed and classified in accordance with the EPA's Waste Classification Guidelines as in force from time to time.	Auditors sighted WA's waste classification summary, showing a systematic approach to proper assessment and classification in line with EPA's Waste Classification Guidelines. Beyond some baghouse dust residues, WA produces negligible waste with respect to process residues. Baghouse dust residues have been classified as general solid waste and disposed of accordingly. Residues generated in response to the November 2021 fire event were contained, consolidated (like-for-like) and classified in consultation with NSW EPA prior to disposal offsite.	Compliant	
EPL31	O5.2	The licensee must ensure that waste identified for recycling is stored separately from other waste.	Section 5 of the Operational Environmental Management Plan addresses waste management at WA. The waste management control measures in Table 7 stipulate that all waste will be handled under the approved Waste Management Plan. Very little waste is generated at WA's site. Auditors noted separation of waste with labelled bins in the workshop and site office.	Compliant	
O6 Other operating conditions					
EPL32	O6.1	The continuous fluoride emission monitoring system associated must activate visible and audible alarms in the	The November 2021 fire event damaged the HF monitoring and control	Non-compliant	No further action required.

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		event that the concentration of fluoride emitted to atmosphere via Point 1 exceeds 1.4 milligrams per cubic metre.	instrumentation, resulting in the inoperability of the alarms from the time of the incident until 26 July 2022. Site inspection confirmed reinstatement of alarms. The alarms on the continuous fluoride emission monitoring system activate conservatively at a fluoride concentration of 1.2 mg/m3.		
EPL33	O6.2	If the 1 hour average concentration of gaseous fluoride emitted to atmosphere exceeds 1.4 milligrams per cubic metre at Point 1, the plant or section of the plant where the exceedance occurs must cease operating until the licensee is able to ensure compliance with the emission limits specified in this licence.	Continuous gaseous fluoride monitoring results are available in monthly spreadsheets on the Weston Aluminium website. No exceedances have been recorded within the audit period.	Compliant	
EPL34	O6.3	The automated lime dosing systems that feeds the baghouses that service Points 13 and 17 must activate and audible alarms in the event that insufficient lime is added to the baghouses.	PLC controlled processes are available at these locations and trigger audible and visible alarms. Checking these points forms part of the weekly enviro inspection conducted by the Environment and Sustainability Manager. Auditors reviewed checklist data from these inspections.	Compliant	
EPL35	O6.4	Logged data from the automated lime dosing systems that feeds the baghouses that services Points 13 and 17 must be kept on site for a period of at least 4 years after the data or record was obtained.	Local PLC stores this data on site. The data extends approximately 10years prior to the 2021 fire event. WA produced examples of historical baghouse monitoring data to auditors.	Compliant	
EPL36	O6.5	The licensee must store and handle all liquid chemicals and hazardous materials used at the premises within bunded areas that are constructed and maintained in accordance with the following: a) any relevant Australian Standards for the liquids being stored;	Auditors viewed 'Weston Aluminium Authorised Waste Storage Study) dated March 2022, along with the Waste Receipt and Storage Plan dated May 2022. WA provided evidence that waste (especially liquid chemicals and hazardous materials) is stored according to the Waste Receipt	Non-compliant	As described in the Hazard Audit 2023, install the sign AS 1940:2017 sign "NO SMOKING, NO IGNITION SOURCES WITHIN 3 m' in lettering at least 50 mm high and ensure all electrical devices within this radius are appropriately Ex rated.

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		b) within a bunded area with a minimum bund capacity of 110% of the volume of the largest single stored vessel within the bund; c) the Storing and Handling Liquids: Environmental Protection Participant's Manual (DECC, 2007); and where any conflict exists between these requirements, the most stringent requirements apply. Note: For the purpose of this condition, any tanks or other storage vessels that are interconnected and may distribute their contents either by gravity or automated pumps must be considered a single vessel.	and Storage Plan, in the form of the 'Hazard Identification and Risk Assessment' worksheets for the Dross Storage, Handling and Processing Area and the Pharmaceutical and Illicit Drug Waste Processing Procedure. This was further backed up by the 'Receipt, Storage and Handling of Toxic and Infectious Substances' procedure. There are no freestanding waste stockpiles or waste stores in the open air. All waste storage areas are appropriately signposted to inform personnel, including emergency personnel, of their content under the Waste Management Plan. However, the 2023 Hazard Audit by Advitech Pty Ltd was reviewed by auditors, which found the workshop DG cabinet was not appropriately labelled.		The store qualifies as a packaged Class 3 package store (cabinet) and must be shown on the Site Plan. Update the Manifest Site Plan to show the location of this store. The cabinet volume is above 250 L capacity and is therefore a Placard quantity store and must be included on the Hazardous Chemicals Manifest and notified to SafeWork NSW.
EPL37	O6.6	The licensee must ensure that suitable measures (e.g. high/low alarms, control valves with interlock control, one way valves) are installed on all tanks, ponds or clarifiers and associated pipes and hoses to prevent the spillage of waste.	Diesel tanks located within the Scrap Yard and adjacent to the Maintenance Workshop are self-bunded (duel-walled) systems. The self-bunded tank adjacent to the maintenance workshop is also located within the original diesel facility concrete bund. The Main Pond is fully-bunded, and no connections exist to the environment (100% discharge to Trade Waste under agreement with Hunter Water). Should any spills occur on site, these are attended to in accordance with Spill Response procedures. As above, if any spill residues were to mobilise to the Main Pond, effluent is disposed of to Trade Waste, and not via environmental discharge.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
EPL38	O6.7	The Reverberatory Furnace and No. 2 Rotary Furnace must not be operated simultaneously with emissions reporting to Baghouse No. 1.	A damper system is installed within the Scrubber-Baghouse inlet ducting, which can only be selected to either Rotary or Reverb. WA's PLC trend recording displays damper position history.	Compliant	
Thermal Waste Treatment Plant					
EPL39	O6.8	The thermal waste treatment plant must, as a minimum, use primary and secondary (i.e. two stage) combustion.	SSD7396 is subject to a separate IEA.	Not triggered	
EPL40	O6.9	The maximum amount of waste that can be processed in the thermal waste treatment plant at any one time is 800 kilograms per hour.	SSD7396 is subject to a separate IEA.	Not triggered	
EPL41	O6.10	The thermal waste treatment plant is limited to processing only the following wastes: (a) Medical wastes; (b) Quarantine wastes; (c) Other wastes: limited to oily rags, pitch sludge residue and solvents and paints, confidential documents (no more than 10% by mass at any one time); and, waste chemical substances from research and development or teaching activities (with prior specific written approval from the EPA).	SSD7396 is subject to a separate IEA.	Not triggered	
EPL42	O6.11	For the purposes of condition O6.10 there are currently no prior specific written approvals issued by the EPA.		Noted	
EPL43	O6.12	The Bypass Stack from the Thermal Waste Treatment Plant known as Stack 8 (Point 16) is not to be used, except in the event of an emergency shutdown. In the event that emissions are directed to and discharged from the Bypass Stack, the licensee must provide immediate notification to the EPA by telephoning the EPA's Environment Line on 131 555.	SSD7396 is subject to a separate IEA.	Not triggered	
EPL44	O6.13	All emissions from the burnout hearth must be directed to the emission control equipment associated with the thermal waste treatment plant.	SSD7396 is subject to a separate IEA.	Not triggered	
EPL45	O6.14	Emissions from Point 17 (Stack 5) must have a minimum stack discharge velocity of 18 metres per second.	SSD7396 is subject to a separate IEA.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
EPL46	O6.15	The licensee must permanently mark the floor of the Thermal Waste Treatment Plant building to delineate all areas identified for the safe storage of waste.	SSD7396 is subject to a separate IEA.	Not triggered	
EPL47	O6.16	Waste stored within the Thermal Waste Treatment Plant building must be stored within the areas marked and delineated for safe storage of waste, unless the waste is being prepared for processing or is being processed.	SSD7396 is subject to a separate IEA.	Not triggered	
No. 2 Rotary Furnace – Processing of pharmaceutical and illicit drug waste					
EPL48	O6.17	Pharmaceutical waste and/or illicit drug waste that is of a liquid state of matter must not be co-processed with aluminium dross and/or spent pot lining.	Ensuring pharmaceutical waste/liquid illicit drug waste are not co-processed with aluminium dross and/or spent pot lining is addressed in Section 5 of the Pharmaceutical and Illicit Drug Waste Processing Procedure. This is verified by Operator inspection. The state of the waste (liquid / solid) is recorded on shift-based Rotary Furnace Charge Reports, sighted by auditors during inspection.	Compliant	
EPL49	O6.18	Pharmaceutical waste and/or illicit drug waste shall only be added to the No. 2 Rotary Furnace when its refractory surface temperature is measured to be greater than 500 degrees Celsius.	Auditors observed Rotary Furnace Charge Reports for Pharmaceutical and illicit drug processing. Temperatures were observed to be 513 degrees Celsius, above the required 500 degrees Celsius, during processing.	Compliant	
EPL50	O6.19	Pharmaceutical waste and/or illicit drug waste must not be added to the No. 2 Rotary Furnace at a rate exceeding 50 kilograms per 10 minutes.	Auditors sighted Rotary Furnace Reports for the processing of pharmaceutical and illicit drugs. The reports clearly track the weight and type of drugs processed in given time periods. No exceedances of the approved 50kg per 10 minutes were present on the furnace reports reviewed by auditors.	Compliant	
EPL51	O6.20	When processing pharmaceutical waste and/or illicit drug waste in the No. 2 Rotary Furnace, the temperature of the of the exhaust gas exiting the No. 2 Rotary Furnace must be:	Rotary Furnace Reports demonstrate continuous monitoring, with entries logged every 10 minutes by hand.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(a) continuously monitored; (b) maintained at or above 850 degrees Celsius while processing; and (c) recorded by a data logging system at a frequency not exceeding 1 minute intervals.	It is clear from the text in the report that door/flue temperature must remain greater than 850 degrees Celsius. Data recorded on sighted sheets showed temperature was greater than 850 degrees Celsius when processing waste. Auditors sighted Rotary Temperature tracking spreadsheets, recorded at 1 minute intervals, confirming data is logged at appropriate intervals. It was also noted that the temperatures recorded on the Rotary Temperature tracking spreadsheets never fell below 850.		
EPL52	O6.21	The licensee must cease thermally processing pharmaceutical waste and/or illicit drug waste in the No. 2 Rotary Furnace if monitoring results show an exceedance of the dioxin and furan concentration limit specified under the licence for Point 1.	There have been no exceedances of concentration limits of dioxins and furans within the audit period.	Not triggered	
5 Monitoring and Recording Conditions					
M1 Monitoring records					
EPL53	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.	All monitoring data is recorded and stored by WA and submitted with the Annual Return.	Compliant	
EPL54	M1.2	All records required to be kept by this 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.	WA were able to show all records including Annual Returns in a legible form for the required retaining period of 4 years. There have been no requests by EPA officers to view records.	Compliant	
EPL55	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;	All monitoring records were observed to contain the dates, times and points of samples taken. Auditors viewed Chain of Custody sheets for monitoring data, showing names and companies of those	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		c) the point at which the sample was taken; and d) the name of the person who collected the sample.	taking the samples and those receiving the data.		
M2 Requirement to monitor concentration of pollutants discharged					
EPL56	M2.1	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:	Auditors sighted Annual and 6-monthly Air Emissions Monitoring Reports relevant to the audit period. It is noted that Stack 2 and Stack 3 have been decommissioned and removed, therefore no testing is required. Monitoring methodology for Monitoring Points was observed to be appropriate with respect to units of measurements, frequency and sampling method. This non-compliance was caused by the November 2021 fire event at the site. The fire damaged monitoring instrumentation and the HF system was inoperable in 2022 until 26 July, when it was reinstated. This resulted in a large portion of missing data for the reporting period. According to the 2021-22 Annual Return, no fluoride-containing furnace inputs were processed at the premises between the incident and 26 July 2022. A portion of cyanide monitoring data from the first half of the 2021 reporting period is also absent due to fire damage to monitoring instrumentation. However, annual cyanide monitoring suggests that the cyanide emissions on a yearly basis were negligible (<0.0083 mg/m3).	Non-compliant	WA has reinstated the appropriate monitoring instrumentation since the fire event. Monitoring has been undertaken in a compliant manner since the equipment was reinstated.
EPL57	M2.2	Air Monitoring Requirements	Auditors reviewed the Air Quality Monitoring Program and the Annual Returns for the reporting period and found WA's air quality monitoring and reporting	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		POINT 1 Pollutant / Units of measure / Frequency / Sampling Method Cadmium / milligrams per cubic metre / Special Frequency 2 / TM-14 Carbon monoxide / milligrams per cubic metre / Special Frequency 2 / TM-32 Cyanide / milligrams per cubic metre / Special Frequency 2 / Special Method 2 Dioxins & Furans / nanograms per cubic metre / Special Frequency 2 / TM-18 Gaseous fluoride / milligrams per cubic metre / Continuous / Special Method 1 Hydrogen chloride / milligrams per cubic metre / Special Frequency 2 / TM-7 & TM-8 Moisture / percent / Special Frequency 2 / TM-22 Molecular weight of stack gases / grams per gram mole / Special Frequency 2 / TM-23 Nitrogen Oxides / milligrams per cubic metre / Special Frequency 2 / TM-11 Oxygen (O2) / percent / Special Frequency 2 / TM-25 Solid Particles / milligrams per cubic metre / Special Frequency 2 / TM-15 Sulfuric acid mist and sulfur trioxide (as SO3) / milligrams per cubic metre / Special Frequency 2 / TM-3 Temperature / degrees Celsius / Special Frequency 2 / TM-2 Type 1 and Type 2 substances in aggregate / milligrams per cubic metre / Special Frequency 2 / TM-12, TM-13 & TM-14 Velocity / metres per second / Special Frequency 2 / TM-2 Volumetric flowrate / cubic metres per second / Special Frequency 2 / TM-2 POINT 2 Pollutant / Units of measure / Frequency / Sampling Method Solid Particles / milligrams per cubic metre / Special Frequency 1 / TM-15 POINT 3 Pollutant / Units of measure / Frequency / Sampling Method Solid Particles / milligrams per cubic metre / Special Frequency 1 / TM-15 POINT 4 Pollutant / Units of measure / Frequency / Sampling Method Solid Particles / milligrams per cubic metre / Yearly / TM-15	process to be compliant with the table provided.		

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations

POINT 13

Pollutant	Units of measure	Frequency	Sampling Method
Cadmium	milligrams per cubic metre	Yearly	TM-14
Dioxins & Furans	nanograms per cubic metre	Every 6 months	TM-18
Dry gas density	kilograms per cubic metre	Every 6 months	TM-23
Fluorides	milligrams per cubic metre	Yearly	TM-10
Hydrogen chloride	milligrams per cubic metre	Yearly	TM-7 & TM-8
Moisture content	percent	Yearly	TM-22
Nitrogen Oxides	milligrams per cubic metre	Yearly	TM-11
Oxygen (O2)	percent	Every 6 months	TM-25
Solid Particles	milligrams per cubic metre	Yearly	TM-15
Sulfuric acid mist and sulfur trioxide (as SO3)	milligrams per cubic metre	Yearly	TM-3
Temperature	degrees Celsius	Yearly	TM-2
Type 1 and Type 2 substances in aggregate	milligrams per cubic metre	Yearly	TM-12, TM-13 & TM-14
Velocity	metres per second	Every 6 months	TM-2
Volatile organic compounds	milligrams per cubic metre	Yearly	OM-2
Volumetric flowrate	normalised cubic metres per second	Every 6 months	TM-2

POINT 14

Pollutant	Units of measure	Frequency	Sampling Method
Carbon monoxide	milligrams per cubic metre	Yearly	OM-1
Dry gas density	kilograms per cubic metre	Yearly	TM-23
Moisture content	percent	Yearly	TM-22
Nitrogen Oxides	milligrams per cubic metre	Yearly	TM-11
Oxygen (O2)	percent	Yearly	TM-25
Solid Particles	milligrams per cubic metre	Yearly	TM-15
Temperature	degrees Celsius	Yearly	TM-2
Velocity	metres per second	Yearly	TM-2
Volumetric flowrate	normalised cubic metres per second	Yearly	TM-2

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		POINT 17 Pollutant / Units of measure / Frequency / Sampling Method Cadmium / milligrams per cubic metre / Quarterly / TM-14 Carbon monoxide / milligrams per cubic metre / Continuous / CEM-4 Dioxins & Furans / milligrams per cubic metre / Quarterly / TM-18 Dry gas density / milligrams per cubic metre / Quarterly / TM-23 Hydrogen chloride / milligrams per cubic metre / Continuous / Special Method 3 Mercury / milligrams per cubic metre / Quarterly / TM-14 Nitrogen Oxides / milligrams per cubic metre / Quarterly / TM-11 Oxygen (O2) / percent / Continuous / CEM-3 Solid Particles / milligrams per cubic metre / Continuous / Special Method 4 Sulfur dioxide / milligrams per cubic metre / Quarterly / TM-4 Sulfuric acid mist and sulfur trioxide (as SO3) / milligrams per cubic metre / Quarterly / TM-3 Temperature / Kelvin / Continuous / CEM-6 Type 1 and Type 2 substances in aggregate / milligrams per cubic metre / Quarterly / TM-12, TM-13 & TM-14 Velocity / metres per second / Continuous / CEM-6 volatile organic compounds as n-propane equivalent / milligrams per cubic metre / Quarterly / TM-34 Volumetric flowrate / cubic metres per second / Continuous / CEM-6 POINT 18 Pollutant / Units of measure / Frequency / Sampling Method Solid Particles / milligrams per cubic metre / Yearly / TM-15			
EPL58	M2.3	For the purposes of the table(s) above: (a) Special Method 1 means a continuous gaseous fluoride monitor. (b) Special Method 2 means USEPA OTM-29. (c) Special Method 3 means US EPA Performance Specification 18, or an alternative method agreed to in writing by the EPA. (d) Special Method 4 means US EPA Performance Specification 11, or an alternative method agreed to in writing by the EPA. Test Method (TM) Sampling must be conducted under conditions associated with reasonable worse-case emissions potential, with consideration of process load and waste composition.		Noted	
EPL59	M2.4	In relation to condition M2.3 no alternative method or methods have been agreed to in writing by the EPA.		Noted	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
EPL60	M2.5	For the purposes of the tables above: (a) Special Frequency 1 means the collection of samples yearly upon the licensee first returning the emissions units that report to these points to service in the event that Fabric Filter Baghouses No. 2 and No. 3 are reinstated at the premises. (b) Special Frequency 2 means the collection of samples: (i) yearly, during the processing of aluminium dross and/or spent pot lining, or the co-processing of aluminium dross and/or spent pot lining with pharmaceutical waste and/or illicit drug waste that is of a solid state of matter; and (ii) twice yearly (at least six months apart), during the processing of pharmaceutical waste and/or illicit drug waste that is of a liquid state of matter. Note: The EPA may revise Special Frequency 2 after reviewing two rounds of monitoring (i.e. 12 months after the addition of Special Frequency 2 to the licence).		Noted	
EPL61	M2.6	Water and/ or Land Monitoring Requirements POINT 12 Pollutant: Aluminium; Units of measure: milligrams per litre; Frequency: Yearly; Sampling Method: Grab sample Pollutant: Conductivity; Units of measure: microsiemens per centimetre; Frequency: Yearly; Sampling Method: Grab sample Pollutant: Cyanide; Units of measure: milligrams per litre; Frequency: Yearly; Sampling Method: Grab sample Pollutant: Fluoride; Units of measure: milligrams per litre; Frequency: Yearly; Sampling Method: Grab sample Pollutant: pH; Units of measure: pH; Frequency: Yearly; Sampling Method: Grab sample Pollutant: Total suspended solids; Units of measure: milligrams per litre; Frequency: Yearly; Sampling Method: Grab sample	Water testing records are available on Weston Aluminium website. Yearly records of testing for each of the pollutants specified in the correct units of measurement are present. WA's water monitoring regime is compliant with the table.	Compliant	
M3 Testing methods - concentration limits					
EPL62	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 c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing	Air emissions monitoring is conducted by suitably qualified professionals at Port Hunter Environmental in accordance with the Act and relevant Australian Standards.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		by the EPA for the purposes of that testing prior to the testing taking place.			
EPL63	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. Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".	All monitoring was observed to be in accordance with Approved Methods publication. No relevant other approved methods required.	Compliant	
M4 Testing methods - load limits					
EPL64	M4.1	Note: Division 4 of the Protection of the Environment Operations (General) Regulation 2022 requires that monitoring of actual loads of assessable pollutants listed in L2.2 must be carried out in accordance with the relevant load calculation protocol set out for the fee-based activity classification listed in the Administrative Conditions of this licence.		Noted	
M5 Recording of pollution complaints					
EPL65	M5.1	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.	All complaints received through any medium (ie phone line, letter, email, etc) are reported in Compliance Reports annually. WA's complaints record was sighted by auditors. The record was found to be legible and contain all relevant details.	Compliant	
EPL66	M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were	Auditors sighted WA's complains register. The spreadsheet contained dates and times, methods, natures, personal details of complainants and a record of responsive actions for each complaint.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.			
EPL67	M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Weston Aluminium provided history of complaints for auditors to review, dating back to the 2019-20 reporting period.	Compliant	
EPL68	M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	WA has not been requested to produce the complaints records by EPA officers aside from annual return deliverables.	Not triggered	
M6 Telephone complaints line					
EPL69	M6.1	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 complaints telephone line is manned constantly during operating hours. Contact details are available on the website and at the gate for members of the public to make contact/complaints.	Compliant	
EPL70	M6.2	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.	The complaints telephone line is manned constantly during operating hours. Contact details are available on the website and at the gate for members of the public to make contact/complaints.	Compliant	
EPL71	M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.		Noted	
5 Monitoring and Recording Conditions					
R1 Annual Return Documents					
EPL72	R1.1	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,	Auditors sighted WA's Annual Returns for the 4 year period leading up to the audit site inspection. Annual Returns were observed to contain a statement of compliance, a monitoring	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		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.	and complaints summary, a Statement of Compliance - Licence Conditions, a Statement of Compliance - Load based Fee, a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, a Statement of Compliance - Requirement to Publish Pollution Monitoring Data and a Statement of Compliance - Environmental Management Systems and Practices.		
EPL73	R1.2	An Annual Return must be prepared in respect of each reporting period, 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.	Annual Returns have been prepared in a compliant manner throughout the reporting period. No exceptions applied.	Compliant	
EPL74	R1.3	Where this licence is transferred from the licensee to a new licensee: a) 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 b) 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.	There has been no transfer of this EPL.	Not triggered	
EPL75	R1.4	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: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or	There has been no surrender or revoking of this EPL.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.			
EPL76	R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	A search of the EPA Public Register revealed WA's submission of annual returns during the audit period within the 60 day time limit.	Compliant	
EPL77	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: a) the assessable pollutants for which the actual load could not be calculated; and b) the relevant circumstances that were beyond the control of the licensee.	Annual Returns were sighted by auditors while completing the audit. All sections were completed and all actual load calculations were completed.	Compliant	
EPL78	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.	Auditors sighted the Annual Returns for the previous four years, which had been retained and were provided by WA upon request.	Compliant	
EPL79	R1.8	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Annual Returns signed by company directors electronically after submission via EPAConnect. EPA receipts sighted by auditors.	Compliant	
R2 Notification of environmental harm					
EPL80	Note:	The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	One incident occurred within the audit period. The November 14 2021 fire incident was reported to the EPA on November 19 2021, in accordance with Part 5.7 requirements.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
EPL81	R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Following the November 2021 fire incident, WA made two attempts to contact the Environment Service Line. No response was elicited. WA proceeded to contact the regional EPA Officer via mobile phone.	Compliant	
EPL82	R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.	The fire incident was reported in writing via email to the EPA November 19 2021, 5 days after the fire incident. No other incidents requiring notification occurred during the audit period.	Compliant	
R3 Written report					
EPL83	R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) 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.	NSW EPA requested a written report in response to visible emissions on 18 February 2022. Auditors sighted the request, which provided a due date of 25 February 2022. Auditors then sighted WA's response, submitted 25 February, which clearly outlined the incident, the EPL condition of relevance, contacts details and appropriate responses to each of the EPA's requests for details. WA prepared a similar written report regarding the November 2021 fire incident.	Compliant	
EPL84	R3.2	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.	WA's response to the EPA's request for a written report regarding the visible emissions incident showed evidence tat WA had made all reasonable enquiries in relation to the event. The report was provided within the requested time period.	Compliant	
EPL85	R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event;		Noted	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		b) the type, volume and concentration of every pollutant discharged as a result of the event; c) 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; d) 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; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.			
EPL86	R3.4	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.	No further enquiries were reported.	Noted	
EPL87	R3.5	A noise compliance assessment report must be prepared every three years and submitted to the EPA with the Annual Return. The report must be prepared by an accredited acoustical consultant and must provide an assessment of compliance with Condition L5.2.	WA was deemed to be compliant by suitably qualified technical specialists 'Spectrum Acoustics' in the most recent noise compliance study – 'Noise Compliance Study, October 2021 Weston Aluminium' (Spectrum Acoustics), available on WA website.	Compliant	
R4 Other reporting conditions					
Reporting air exceedances					
EPL88	R4.1	Within seven days of becoming aware of an exceedance of the air concentration limits provided under the Protection of the Environment Operations (Clean Air) Regulation 2022 (as amended), or the licence, the licensee must provide a written	Weston Aluminium's Air Emissions monitoring data is available for download in 6 monthly and annual increments on their public facing website. No exceedances were recorded within the	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		report to the EPA. The report must include, but is not limited to, the following. (a) The date that the monitoring was undertaken. (b) Details of the Point that the monitoring was undertaken where the exceedance occurred. (c) The pollutant in which the concentration limit was exceeded. (d) The monitored concentration of the pollutant that the limit was exceeded. (e) The operating conditions of the respective plant at the time that the monitoring was undertaken. (f) The cause, or likely cause, of the concentration limit exceedance. (g) Action taken, or proposed to be taken, by the licensee in response to the exceedance. The report must be emailed to the EPA at info@epa.nsw.gov.au. Note: The condition above does not remove any requirement to notify pollution incidents causing or threatening environmental harm under Part 5.7 of the Act.	audit period. It is noted that Monitoring Points 2 and 3 were destroyed by the fire incident and have been decommissioned and removed.		
Reinstating Fabric Filter Baghouses No. 2 and No. 3					
EPL89	R4.2	The licensee must provide written notification to the EPA within seven days of reinstating Fabric Filter Baghouses No. 2 and No. 3, that report to Points 2 and 3, and returning them to operations. The notification must be provided by email to info@epa.nsw.gov.au.	Fabric Filter baghouses No.2 and No. 3 were decommissioned and have not been reinstated within the audit period.	Compliant	
No. 2 Rotary Furnace – processing of pharmaceutical and illicit drug waste					
EPL90	R4.3	All pharmaceutical waste and illicit drug waste (whether solid or liquid state of matter) processed in the No. 2 Rotary Furnace must be identified and recorded. The information recorded must include, but is not limited to, the following.	Auditors reviewed Rotary Furnace Charge Report (pharmaceutical and illicit drugs). The report contained details of the type of waste processed, an overall description of the waste, the date and time the waste was added to the furnace and details	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(a) The type of waste processed (pharmaceutical and/or illicit drug waste) and the physical state of matter of the waste (i.e. solid or liquid). (b) A general description of the waste. (c) The date and time the waste was added to the No. 2 Rotary Furnace. (d) Details of any consignment numbers or identification used to track the consignment of waste. (e) Details of whether the waste was co-processed with either aluminium dross or spent pot lining. Records must be maintained for at least four years from the date that the waste was processed; and produced to any authorised officer of the EPA who asks to see them.	regarding co-processing (no cases of coprocessing were noted). WA showed auditors Rotary Operation Sheets, which identify the location of waste storage (Bay G - where incoming DHL pharma waste deliveries are received to). This reference is traced back to the original delivery and storage and hence to the original consignment details.		
7 General Conditions					
G1 Copy of licence kept at the premises or plant					
EPL91	G1.1	A copy of this licence must be kept at the premises to which the licence applies.	WA produced a copy of EPL 6423 to auditors at the site inspection.	Compliant	
EPL92	G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	The EPA has not requested to see the licence. WA keeps a copy on hand in case the need to produce it arises.	Not triggered	
EPL93	G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	The licence is freely available for employees and agents to access.	Compliant	
G2 Contact number for incidents and responsible employees					
EPL94	G2.1	The licensee must operate 24-hour telephone contact lines for the purpose of enabling the EPA to directly contact one or more representatives of the licensee who can: a) respond at all times to incidents relating to the premises; and b) contact the licensee's senior employees or agents authorised at all times to: i) speak on behalf of the licensee; and	24 hour contact phone lines are operated on site. This is advertised on site signage and on WA's public facing website. Any after hours calls are directed straight to the Team Leader's mobile phone.	Compliant	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		ii) provide any information or document required under this licence.			
G3 Other general conditions					
EPL95	G3.1	Completed Programs Program / Description / Completed Date		Noted	

Ref No.	Cond No.	Audit Finding & Recommendations			Comments & Evidence	Audit Findings	Recommendations
		Secondary Aluminium Smelter Best Practice	Report comparing design, performance, operation against international best practice for 2nd'ry aluminium smelters. Include pre-sorting of feed material, fugitive emissions capture and dioxin control. Aim to minimis fugitives and DP13<1ng/m3 at all times. Reduce fugitive and point source emissions of dioxins and furans.	01-March-2006			
		Sealed Feeding System	Provide a report detailing preferred sealed feeding system to load scrap aluminium and heat recovery technology options, fugitive dioxin emission are minimise and dioxin emissions are less than 0.1 ng/m3.	27-November-2006			
		Performance of lime fed baghouse scrubber	Provide an evaluation report on the performance of the lime fed baghouse scrubber to ensure that dioxin emissions are less than 0.1 ng/m3 from DP13.	01-December-2006			
		Investigation into catalytic coated filter bags	Investigation into catalytic coated filter bags. To ensure that dioxin emission are less than 0.1 ng/m3 at DP13.	20-April-2009			
		Commencement of works	Prior to commencement of works - demonstrate that changes to emission collection system serving reverb furnace will have acceptable off site impact via modelling. Ensure that works are effective in ensuring that fugitive emission are captured and dioxin emissions are less than 0.1 ng/m3 at DP 13.	04-September-2007			
		Investigation of re-use of contaminated surface water	Investigation of sustainable on-site re-use of contaminated surface water. Ensure that on site disposal of high Al and F water is sustainable and does not impact on soil or surface water quality.	31-May-2007			
		PRP 7 - Fugitive Emission Capture	Continuous Improvement Program - Fugitive Emission Capture - demonstrate fugitive emissions capture from reverberatory furnace hood. Decrease fugitive emissions of air pollutants including dioxins and furans.	31-August-2010			
		Measurement of lime usage	Demonstrate auditable means of measuring lime usage rate to Baghouse 5. Control dioxin and furan emissions.	31-August-2010			
		Measurement of metal level	Demonstrate auditable means of measuring the metal level within the reverberatory furnace. Control the emission of dioxins and furans.	31-August-2010			
		Procedures to minimise fugitive emissions	Describe procedures to minimise fugitive emissions from the reverberatory furnace. Control emission of dioxins and furans.	31-August-2010			
		Spent Potlining Material Processing Trial	Spent Potlining Material Processing Trial. Comprehensive air quality monitoring throughout the trial.	09-November-2010			
		Spent Potlining Material Processing Trial (2)	Spent Potling Material Processing Trial. Comprehensive air quality monitoring throughout the trial.	14-June-2012			
		Investigation of dioxins and furans in reverberatory furnace combustion emissions	Investigation to determine if dioxin and furans in reverberatory furnace combustion emissions are significantly greater than dioxins and furans in emissions from straight natural gas combustion.	14-September-2012			

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		Mixed Spent Pot Lining Trial: 3000 Tonnes Mixed Spent Potlining Processing Trial to be performed over a twelve month interval. 23-May-2016 Authorised Waste Storage: A study to identify the amount of waste that can be lawfully and safely stored at the Premises at any one time (Authorised Amount). 29-March-2022 Assess Integrity and Permeability of Bunds: The licensee must engage an independent, suitably experienced, and qualified professional to assess and provide a report on the presence, adequacy, structural integrity, and permeability of all bunding structures and hard stand areas including storage and sheds at the premises. 31-March-2022 Premises Water Management System: The licensee must complete a site water management plan, process water sampling plan and leachate management plan. 14-February-2022			
7 Special Conditions					
E1 Compliance Audit					
EPL82	E1.1	The licensee must conduct an independent compliance audit no less than once every three (3) years to assess and report on compliance with the conditions of this licence, including the adequacy of the documentation required by this licence. A report containing the audit findings must be submitted with the Annual Return.	This audit was conducted to satisfy this condition. The previous audit was reviewed. It was found that WA neglected to provide a copy of the previous audit report to the NSW EPA in conjunction with the 2019-2020 Annual Return. The missed submission was an administrative oversight by WA.	Non-compliant	WA has updated its internal records and reporting schedules to ensure this does not happen in future. No further action required.
E2 Thermal Processing Facility (SSD7396)					
Construction of the Thermal Processing Facility					
EPL83	E2.1	This condition authorises construction activities only for the thermal processing facility approved by Development Consent SSD7396. Works and activities must be carried out in accordance with the documents contained in the licence application, except as expressly provided by a condition of this licence.	SSD7396 is subject to a separate audit.	Not triggered	
EPL84	E2.2	Unless otherwise specified by another condition of this licence, construction activities must only be carried out: (a) Between the hours of 7am and 6pm Monday to Friday; (b) between the hours of 8am and 1pm Saturday; and (c) at no time on Sunday or Public Holidays.	SSD7396 is subject to a separate audit.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
EPL85	E2.3	The licensee must ensure that all feasible and reasonable noise and vibration mitigation and management measures are implemented during construction work authorised by the licence, in accordance with the Interim Construction Noise Guideline (DECC,2009).. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	SSD7396 is subject to a separate audit.	Not triggered	
EPL86	E2.4	At least three days prior to commissioning the Thermal Processing Facility, the licensee must provide written notification to the EPA advising its intention to commence commissioning the Thermal Processing Facility. Notification must be provided to the EPA at PO Box 488G, Newcastle NSW 2300, or emailed to info@epa.nsw.gov.au.	SSD7396 is subject to a separate audit.	Not triggered	
EPL87	E2.5	Within seven days of commissioning the Thermal Treatment Facility, the licensee must provided written notification to the EPA advising commissioning of the Thermal Treatment Facility. The notification must be provided to the EPA at PO Box 488G, Newcastle NSW 2300, or emailed to info@epa.nsw.gov.au.	SSD7396 is subject to a separate audit.	Not triggered	
EPL88	E2.6	Within three months of commissioning the thermal waste treatment plant, the licensee must submit to the EPA a Post Commissioning Air Emissions Verification Monitoring and Report which includes, but is not limited to, the following. (a) Air emissions sampling results for the thermal waste treatment plant obtained in accordance with the EPA approved Post Commissioning Proof of Performance Air Emission Sampling Plan included within the Weston Aluminium Preconstruction Design Report, Revision 2, dated July 2019; (b) Comparison of the emission sampling results against the licensed concentration limits; (c) Detailed evaluation of potential off-site impacts based on measured emission concentrations and rates; and	SSD7396 is subject to a separate audit.	Not triggered	

Ref No.	Cond No.	Audit Finding & Recommendations	Comments & Evidence	Audit Findings	Recommendations
		(d) Proposed approach, including timeframe for implementation, to resolve any non-compliances with the licensed concentration limits and the applicable standards of concentration under the Protection of the Environment Operations (Clean Air) Regulation 2021. The Post Commissioning Air Emissions Verification Monitoring and Report must be provided to the EPA's Director - Hunter at PO Box 488G, Newcastle NSW 2300, or emailed to info@epa.nsw.gov.au.			
E3 No. 2 Rotary Furnace – Processing of pharmaceutical and illicit frug waste					
EPL90	E3.1	The licensee must provide notification within seven days of first processing pharmaceutical waste and/or illicit drug waste that is of a liquid state of matter in the No. 2 Rotary Furnace. The notification must be provided in writing an emailed to the EPA at info@epa.nsw.gov.au.	Auditors sighted email communications in which WA notified the EPA that commencement of liquid waste processing. The notification occurred 10 May 2023 with liquid processing to begin 18 May 2023.	Compliant	
EPL91	E3.2	Within six weeks of first processing pharmaceutical waste and/or illicit drug waste that is of a liquid state of matter in the No. 2 Rotary Furnace, the licensee must undertake the first full round of air emissions monitoring required under the licence for Point 1 while processing this waste; and, provide a report to the EPA. (a) Sampling should be undertaken when processing the waste only at the maximum feed rate. (b) The batch cycle should be a minimum of 2 hours to allow for a complaint dioxin test duration. Where this is not practical, a sampling plan must be developed in discussion with the EPA. The report must present the details of the sampling undertaken; a summary of the monitoring results, compared against the pollutant concentration limit specified in the licence. The report must be provided by email to info@epa.nsw.gov.au. Note: This monitoring may count towards the first round of monitoring required under Special Frequency 2 for Point 1 under the licence	Point 1 monitoring data is available for download on WA's public facing website. All testing and analysis is performed in accordance with the National Association of Testing Authority's accreditation requirements.	Compliant	

Appendix C
Stakeholder Consultation

AUDIT CHECKLIST – CONSULTATION SUMMARY

Content

AUDIT CHECKLIST – CONSULTATION SUMMARY 1
Content 1

Table 1: AUDIT CHECKLIST – CONSULTATION SUMMARY

Topic	Comments & Evidence	Status
For the Weston Aluminium 2023 IEA, the department (NSW DPE) requests the audit team take consideration of the following factors:		
Processes/systems are implemented to ensure compliance with activities associated with accepting, storage, and processing of authorised waste materials.	Scheduling of receipt of waste is undertaken with providers. For non-routine wastes, waste description, classification and SDS (where available) are received. CA's and TC's are provided for incoming waste streams. The received waste is then subject to internal inspection at the depository location within the plant. Weighbridge dockets and inspection sheets are scanned and saved on the server. Admin Support Officer, Ebony Prior, demonstrated the process to auditors during site inspection.	Closed
Processes/systems are implemented to ensure activities are undertaken within the boundaries approved by the consent.	All works are kept within the physical boundary approved by DA 86-04-01. This is ensured by site fencing. Site inspection identified no waste or material storage beyond the site boundaries. A weekly enviro inspection is undertaken by the Environment and Sustainability Manager and recorded data is reviewed and saved in an electronic workbook / database. A fire Incident Controls Weekly Inspection occurs on the same day each week. This includes ensuring that 127 and 135 Mitchell Avenue are free of materials storage, checking all material is stored in appropriate areas, any need for supplementary water disposal, any forecast rain, condition of pond, water quality and confirming no discharge is occurring.	Closed
Compliance with contemporary conditions following approval of recent consent modifications (DA86-04-01-Mod 14; LEC10397-1995-Mod 12).	WA demonstrated general compliance of contemporary conditions related to DA86-04-01-Mod 14; LEC10397-1995-Mod 12. Conditions relating to recent modifications were generally deemed compliant by auditors, as demonstrated in the audit checklist.	Closed

Topic	Comments & Evidence	Status
Compliance with contemporary management conditions following approval of the Air Quality Monitoring Program Revision 12 (August 2022).	The Air Quality Monitoring program was updated within one month of DA 86-04- 01 / LEC 10397 of 1995 Mod 12 (air emissions reconfiguration) operational commencement, followed by DPE approval. Auditors reviewed the updated Air Quality Monitoring Program (March 2023), which outlines reconfigured operations and deemed it generally compliant.	

Appendix D
Site Inspection Photographic Record

PHOTOGRAPHIC RECORD

Plate 1 - Aluminium scrap stored in appropriately bunded areas undercover

Plate 2 - Clean, dust free Plant floor

Plate 3 - Aluminium scrap free of contamination

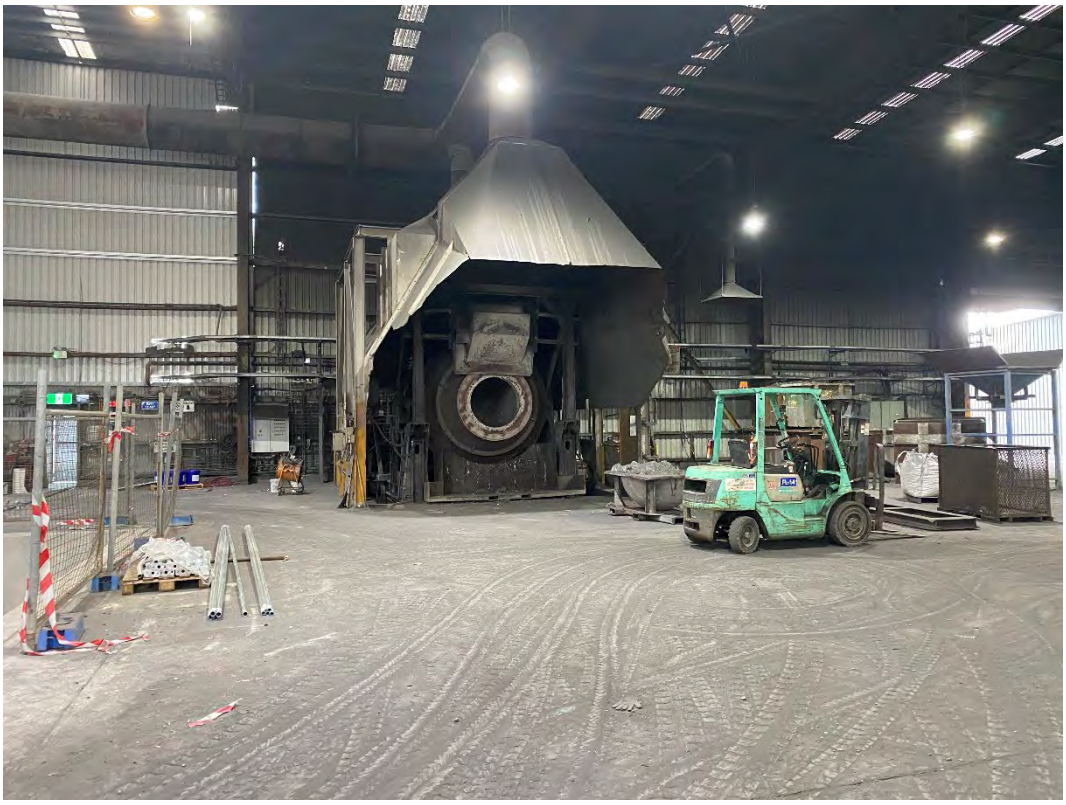


Plate 4 - Rotary Furnace

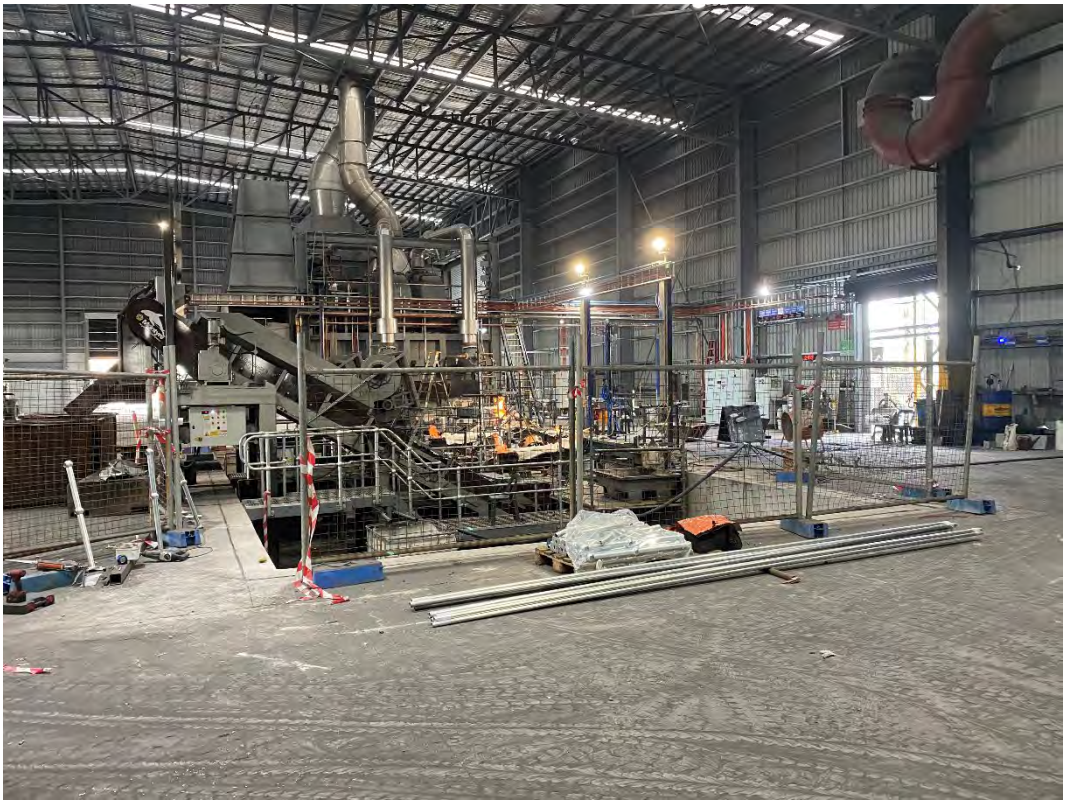


Plate 5 - Casting lines with extractors to Baghouse 1 in background

Plate 6 - Casting lines

Plate 7 - Puck caster and puck trommel with materials stored neatly on pallets

Plate 8 – Puck storage area

Plate 9 – Site office with partially enclosed shed door employing dust mitigation water spray

Plate 10 - Automated HF monitoring

Plate 11 - Lime Silo No. 1 with furnace ventilation in foreground

Plate 12 – Baghouse No. 1 with traffic control signage in foreground

Plate 13 – Baghouse No. 1

Plate 14 – Double skinned fuel tank with concrete bunding

Plate 15 - Wash down area with oil separator in background

Plate 16 - Labelled bins for separating workshop waste

Plate 17 - Lubricants and waste oil bunded storage in lidded containers

Plate 18 - Onsite stormwater containment dam

Plate 19 – Trade waste pump with high level alarm

Plate 20 - Mag flow meter (reports to Hunter Water)

Plate 21 - Received scrap piles with decommissioned shredders ready for sale

Plate 22 - Decommissioned briquetting plant

Plate 23 - Adjacent lot (no material stored)

Plate 24 - Adjacent lot image 2

Plate 25 - Site fencing from adjacent lot

Plate 26 - Truck bringing scrap over weighbridge (scrap not required to be covered)

Plate 27 - Weekly Enviro Inspection record

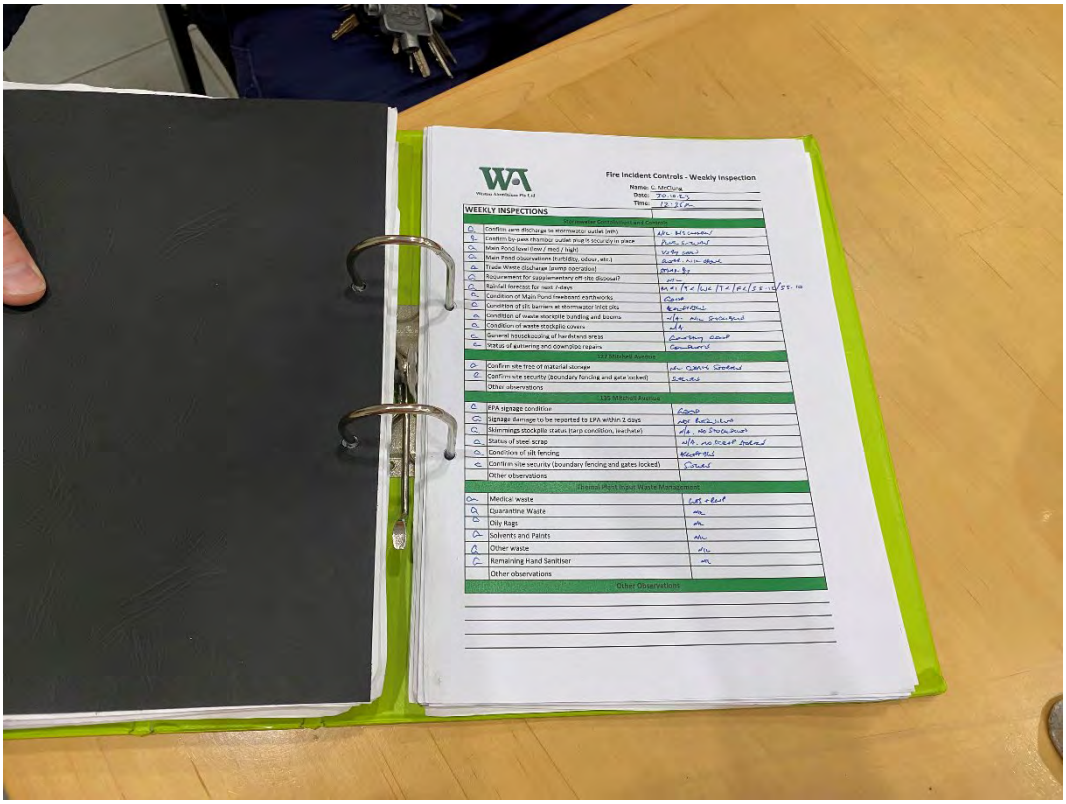
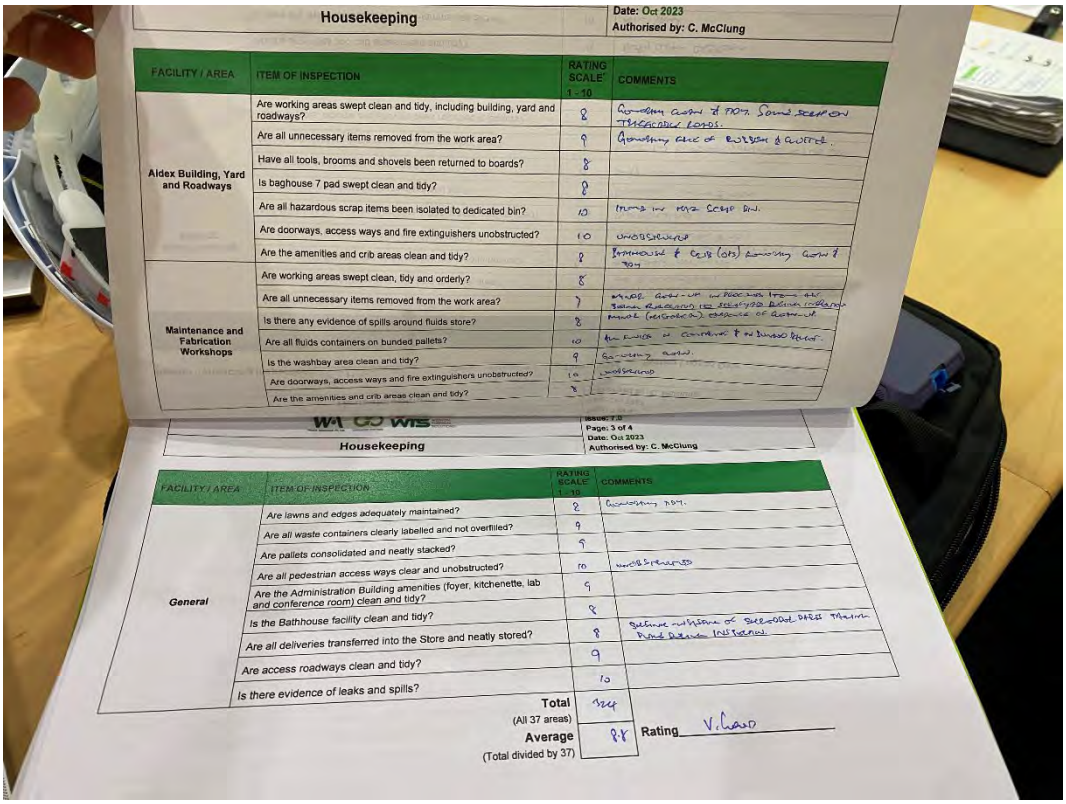


Plate 28 - Weekly Fire Incident Control Inspection checklist

PHOTOGRAPHIC RECORD



Housekeeping

Date: Oct 2023
Authorised by: C. McClung

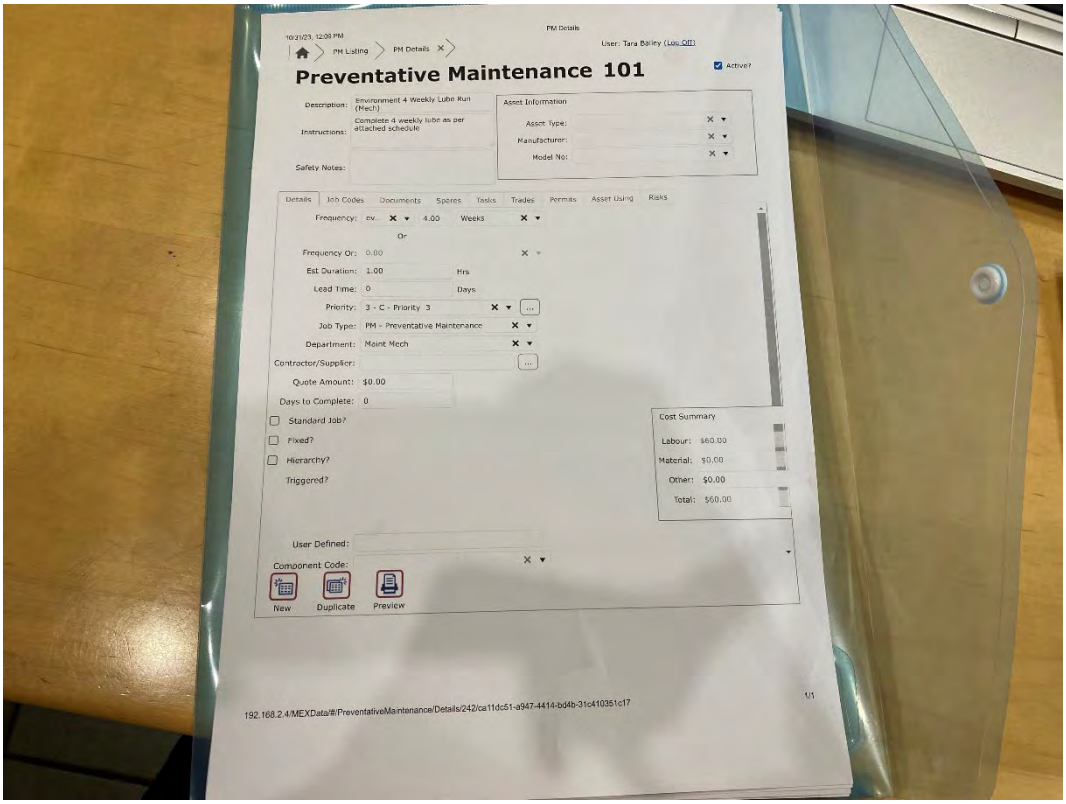
FACILITY / AREA	ITEM OF INSPECTION	RATING SCALE 1 - 10	COMMENTS
Aldex Building, Yard and Roadways	Are working areas swept clean and tidy, including building, yard and roadways?	8	Generally clean & tidy. Some scrap on trafficable roads.
	Are all unnecessary items removed from the work area?	9	Generally free of rubbish & clutter.
	Have all tools, brooms and shovels been returned to boards?	8	
	Is baghouse 7 pad swept clean and tidy?	8	
	Are all hazardous scrap items been isolated to dedicated bin?	10	Items in haz scrap bin.
	Are doorways, access ways and fire extinguishers unobstructed?	10	Unobstructed
	Are the amenities and crib areas clean and tidy?	8	Bathhouse & crib (old) generally clean & tidy
Maintenance and Fabrication Workshops	Are working areas swept clean, tidy and orderly?	8	
	Are all unnecessary items removed from the work area?	7	Minor clutter-up in workshop. Some items of [illegible] maint (McGoldrick). Evidence of clean-up
	Is there any evidence of spills around fluids store?	8	
	Are all fluids containers on bunded pallets?	10	All fluids in containers & on bunded pallets.
	Is the washbay area clean and tidy?	9	Generally good.
	Are doorways, access ways and fire extinguishers unobstructed?	10	Unobstructed
	Are the amenities and crib areas clean and tidy?	8	

Housekeeping

Page: 3 of 4
Date: Oct 2023
Authorised by: C. McClung

FACILITY / AREA	ITEM OF INSPECTION	RATING SCALE 1 - 10	COMMENTS
General	Are lawns and edges adequately maintained?	8	Generally tidy.
	Are all waste containers clearly labelled and not overfilled?	9	
	Are pallets consolidated and neatly stacked?	9	
	Are all pedestrian access ways clear and unobstructed?	10	Unobstructed
	Are the Administration Building amenities (foyer, kitchenette, lab and conference room) clean and tidy?	9	
	Is the Bathhouse facility clean and tidy?	8	
	Are all deliveries transferred into the Store and neatly stored?	8	Outside evidence of [illegible] Material [illegible]
	Are access roadways clean and tidy?	9	
	Is there evidence of leaks and spills?	10	
	Total (All 37 areas)	324	
	Average (Total divided by 37)	8.8	Rating V. Good

Plate 29 - Housekeeping inspection checklist



PM Details

10/21/23, 12:08 PM

PM Listing > PM Details

User: Tara Bailey (Log Off)

Preventative Maintenance 101

Active?

Description: Environment 4 Weekly Lube Run (Mech)

Instructions: Complete 4 weekly lube as per attached schedule

Safety Notes:

Asset Information

Asset Type:

Manufacturer:

Model No:

Details | Job Codes | Documents | Spares | Tasks | Trades | Permits | Asset Using | Risks

Frequency: ev. 4.00 Weeks

Or

Frequency Or: 0.00

Est Duration: 1.00 Hrs

Lead Time: 0 Days

Priority: 3 - C - Priority 3

Job Type: PM - Preventative Maintenance

Department: Maint Mech

Contractor/Supplier:

Quote Amount: $0.00

Days to Complete: 0

Standard Job?

Fixed?

Hierarchy?

Triggered?

Cost Summary

Labour: $60.00

Material: $0.00

Other: $0.00

Total: $60.00

User Defined:

Component Code:

New | Duplicate | Preview

192.168.2.4/MEXData/#/PreventativeMaintenance/Details/242/ca11dc51-a947-4414-bd4b-31c410351c17

1/1

Plate 30 - Preventative maintenance work order 101

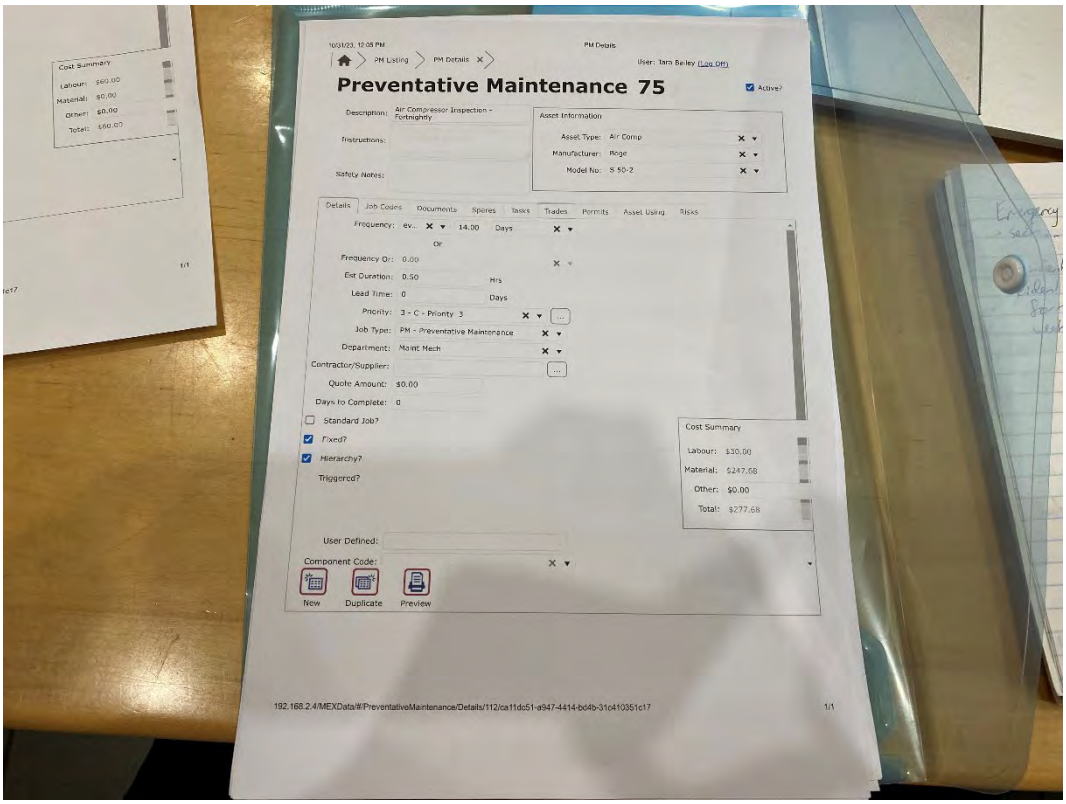


Plate 31 - Preventative maintenance work order 75