



OPERATIONAL COMPLIANCE REPORT

2024 – 25

DA 86-04-01 Mod 16 and LEC 10397 of 1995 Mod 15

MITCHELL AVE KURRI KURRI NSW

REVISION : 0
DATE : 09 October 2025

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1. EXECUTIVE SUMMARY

This 2024-25 Operational Compliance Report has been prepared in accordance with Schedule 4, Condition 61 of Development Consent (DA 86-04-01 MOD 16 and LEC 10397 of 1995 MOD 15; identically worded, and referred to herein as the Consent), and the requirements of the (then) Department of Planning, Industry and Environment's *Compliance Reporting Post Approval Requirements* (PARs; May 2020), to monitor and report on the compliance status of Weston Aluminium's Resource Recovery Facility.

Nil (0) Non-Compliances occurred during the 2024-25 Compliance Reporting period.

2. INTRODUCTION

2.1 Operational and Approval Overview

In 1998, Weston Aluminium (WA) commenced resource recovery facility operations at 129 Mitchell Avenue Kurri Kurri, NSW, traditionally recycling aluminium dross and scrap to produce aluminium sow, ingot and puck, and the on-trading of various forms of scrap metal. The facility was originally approved to process up to 40,000 tonnes of dross and up to 35,000 tonnes of scrap per annum.

WA has since sought a number of Consent modifications to diversify the business, and to further support existing clientele and the broader waste management and resource recovery sectors. These modifications are described as follows:

- Modification 1 (4 October 2001): alterations to the administration building extension;
- Modification 2 (8 August 2002): addition of an annex on the process building;
- Modification 3 (4 September 2009): approval to process 40,000 tonnes of dross aluminium and 35,000 tonnes of scrap aluminium; installation of a new pre-processing facility within the existing ALDEX building; construction of additional dross storage bays; construction and operation of a previously approved baghouse (BH 7); potential relocation of an existing BH (BH 3); and construction of a new stack to vent the holding side of the reverberatory furnace;
- Modification 4 (5 August 2010): approval to undertake a two-week trial to process up to 40 tonnes of Spent Potlining (SPL) in existing furnaces
- Modification 5 (7 February 2011): construction and operation of a briquetting facility within an existing building at the site;

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- Modification 6 (25 October 2011): approval to undertake a 12-month trial to process up to 200 tonnes of SPL in existing rotary furnaces;
- Modification 7 (7 September 2012): approval for Stage 1 of the commercial-scale treatment and processing of Second Cut SPL and construction and operation of a new Rotary Cooler;
- Modification 8 (17 February 2013): approval to undertake a 12-month trial to process up to 3,000 tonnes of Mixed (combined First Cut and Second Cut) SPL in existing rotary furnaces;
- Modification 9 (15 September 2015): approval to undertake a two-year trial to process up to 2,000 tonnes of pharmaceutical and illicit drug wastes in existing furnaces;
- Modification 10 (1 March 2017): removed the distinction in the consent between SPL types, thereby allowing the commercial-scale processing of First Cut, Second Cut and Mixed SPL;
- Modification 11 (withdrawn): submitted application in 2016 for approval to undertake a two-year trial to process up to 1,000 tonnes of quarantine waste. This application was withdrawn to give priority to the determination of the State Significant Development application for the TPF;
- Modification 12 (2 August 2019): approval for the commercial-scale treatment and processing of up to 2,000 tonnes per year of pharmaceutical waste and up to 5 tonnes per year of illicit drug waste in existing furnaces;
- Modification 13 (withdrawn): submitted application for an extension of trial processing of illicit drug and pharmaceutical wastes. This application was withdrawn;
- Modification 14 (3 September 2021): approval to reconfigure its emission control, including the construction of a new baghouse-scrubber which would then be dedicated to the reverberatory furnace operation;
- Modification 15 (10 November 2023): approval to receive, store and shred up to 20,000 tpa of post-consumer product for secure waste destruction; and
- Modification 16 (17 October 2024): approval to operate the Rotary and Reverberatory Furnaces on a concurrent basis.

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This Operational Compliance Report has been prepared in accordance with Condition 61 of Development Consent (DA 86-04-01 Mod 16 and 10397 of 1995 Mod 15) for the 03 August 2023 – 02 August 2024 operational period¹.

2.2 Scope of Compliance Report

Compliance Monitoring and reporting requirements associated with the Development are defined in the Department's PARs, and Conditions 61 of the Consent. Consent wording is reproduced below:

61. 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.*

2.3 Project Name and Project Application Number

Name: Extensions to an existing aluminium dross recycling plant
Application Number: DA 86-04-01 Mod 16 and LEC 10397 of 1995 Mod 15
Address: 129 Mitchell Avenue Kurri Kurri NSW 2327

Note 1: The reporting interval (03 August – 02 August) was established following the publication of the (then) Department of Planning, Industry and Environment's Compliance Reporting Post Approval Requirements (2018), and subsequent implementation of annual Compliance Reporting for (and beyond) DA 86-04-01 Modification 12. Reporting intervals therefore align with the regulatory Approval of Modification 12 operations.

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2.4 Project Address

129 Mitchell Avenue Kurri Kurri NSW 2327

The Development footprint and context is illustrated below in **Figure 1**.

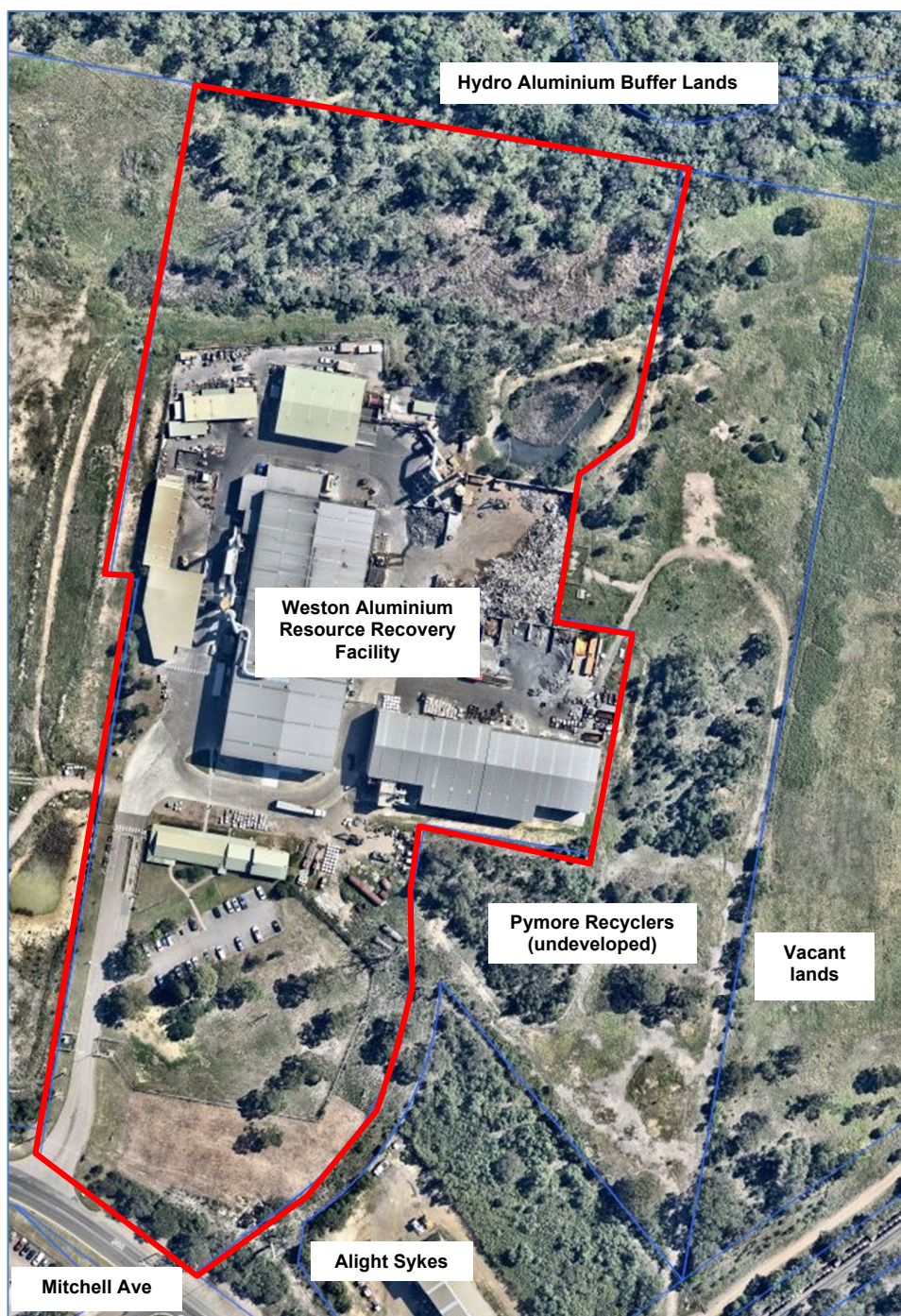


Figure 1 – Development footprint and context

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2.5 Project Phase

Operational

2.6 Compliance Reporting Period

03 August 2024 – 02 August 2025

2.7 Project Activity Summary

The following works are associated with the Compliance Reporting period:

- Conventional site operations;
- Development Consent Modification Approval (DA 86-04-01 MOD 16 and LEC 10397 of 1995 MOD15) permitting concurrent operations of the Rotary and Reverberatory Furnaces;
- Environment Protection Licence Variation in relation to concurrent furnace operations; and
- Commencement of concurrent furnace operations.

2.8 Key Project Personnel

Site Contact: Mr Christopher McClung
Position: General Manager
Company: Weston Aluminium Pty Limited
Contact: cmcclung@westonal.com.au / 0409 462 532

3. COMPLIANCE STATUS SUMMARY

The Compliance Report Summary prepared for the Operational stage of the Development is provided in **Appendix A**. The format of this Report is consistent with PAR (2020) requirements.

4. NON-COMPLIANCES

Nil (0) Non-Compliances occurred during the 2024-25 Compliance Reporting period.

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5. PREVIOUS COMPLIANCE REPORT ACTIONS

Three (3) non-compliances were reported for the previous Compliance Reporting period (2023 – 24). A summary of action resolution and status is provided in **Table 1**.

6. INDEPENDENT AUDIT ACTIONS

Independent Environmental and Hazard Audits were undertaken during the earlier 2023-24 Compliance Reporting period. RPS and Advitech Audit Teams were engaged respectively for these Audits, as endorsed by the DPHI.

A summary of action resolution and status in response to Environmental Audit findings is given in **Tables 2** and **3**. A summary of action resolution and status in response to Hazard Audit findings is given in **Table 4**.

All Audit actions were closed during the earlier 2023-24 reporting interval.

Independent Environmental and Hazard Audits are next scheduled to occur during the 2026-27 Compliance Reporting Period.

7. INCIDENTS

A single (1) Incident occurred during the 2024-25 Compliance Reporting period.

This incident (small localised fire in Baghouse 1 on 05 September 2024) was reported to the Department on 20 September 2025 in accordance with Development Consent requirements (refer **Appendix A**). Weston Aluminium's Pollution Incident Reporting Management Plan was implemented immediately and all relevant authorities were notified accordingly at that time.

In response to the incident, the baghouse deluge system was activated to address the localised fire, operations were ceased and an investigation performed. A limited number of fire-damaged fabric filters (located at the baghouse inlet) were subsequently removed and replaced, and additional monitoring and feedback systems and spark suppression systems were installed to mitigate future incidents.

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Table 1: Summary of Action Closure Status - 2023-24 Non-Compliances

NC Number	ID	Details of Non-Compliance	WA Response	Action Status
1	Schedule 2 Condition 7	Updates of the Fire Safety Study and Emergency Plan are required within 3 months of the Mod 15 approval to include reference to the Consumer Product Waste Shredding activity (i.e. by 10 Feb 2024; refer Condition 56A). Due to an administrative oversight, updates to the FSS and ERP occurred late.	RiskCon Engineering were engaged to prepare the updates in accordance with Consent and HIPAP requirements. Updated Plans were issued to the Planning Secretary on 28 Feb 2025 via the Planning Portal.	CLOSED
2	Schedule 3 Condition 23	Real-time, continuous particulate monitors are used for broken bag detection associated with Baghouses / Stacks 1, 4 and 7. WA has achieved a strong history of air emissions compliance performance. The real-time particulate monitoring controller failed in Jan 2024 and was dispatched for Supplier assessment. Data recovery prior to the failure was limited (up to and including 13 Oct 2023). The Controller unit was replaced, but its configuration was not compatible with existing Sensors, so was returned and again replaced with a customised Controller - commissioned 26 Feb 2024. Consequently, data is not available for the period 13 Oct 2023 – 26 Feb 2024 (refer Appendix A).	No broken bags were detected during the 2023-24 Reporting Period, and routine, independent compliance emissions testing verifies compliance with particulate limit requirements for all stacks (including those fitted with bag leak detectors). Accordingly, no consequence is considered for the limited data availability during the previous 2023-24 reporting period. Real-time, continuous particulate monitoring was reinstated on 26 Feb 2024. Particulate monitoring has been achieved throughout the entire 2024-25 reporting period.	CLOSED
3	Schedule 4 Condition 56A	As above, updates of the Fire Safety Study and Emergency Plan are required within 3 months of the Mod 15 approval to include reference to the Consumer Product Waste Shredding activity (i.e. by 10 Feb 2024; refer Condition 56A). Due to an administrative oversight, updates to the FSS and ERP occurred late.	As above, RiskCon Engineering were engaged to prepare the updates in accordance with Consent and HIPAP requirements. Updated Plans were issued to the Planning Secretary on 28 February 2025 via the Planning Portal.	CLOSED

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Table 2: Summary of Action Closure Status - 2023 Independent Environmental Audit (DA 86-04-01 and LEC 10397 of 1995 (as Modified))

Condition Number ID & Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Weston Aluminium Response	Action Status
Schedule 3, Condition 21 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 Nov 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.	The fluoride emission monitoring and control system has been restored and will continue to be operated and maintained in accordance with approval requirements.	CLOSED
Schedule 3, Condition 23 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 Nov 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.	Particulate emission monitoring systems have been restored and will continue to be operated and maintained in accordance with approval requirements.	CLOSED
Schedule 3, Condition 25 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 Nov 2021 fire event, treated first flush waters (removal of particulates, metals, nutrients and oil & grease) were reused on site for irrigation purposes. Weston Aluminium	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 management of stormwater quality, containment and disposal via Trade Waste will continue in accordance with the	CLOSED

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Condition Number ID & Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Weston Aluminium Response	Action Status
	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 Nov 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.	the incident. No further corrective actions are required.	established (post-fire event) protocol. Stormwater reuse opportunities on site (dust suppression and process cooling) are also being explored to improve future process sustainability.	
Schedule 3, Condition 25A 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 in the open air. All waste was observed to	Weston Aluminium to continue to apply the Authorised Waste Storage Plan and Clinical Waste Receipt and Storage Plan developed in cooperation with the EPA.	Weston Aluminium is committed to the ongoing implementation of the Authorised Waste Storage Plan and Clinical Waste Receipt and Storage Plan, as developed in cooperation with the EPA.	CLOSED

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Condition Number ID & Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Weston Aluminium Response	Action Status
	be stored in appropriately bunded and covered areas during site inspection. Since the non-compliance, Weston Aluminium reports all waste has been stored appropriately.			
Schedule 3, Condition 36 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 <i>Environment Protection Manual Technical Bulletin Bunding and Spill Management</i> 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.	Signage installed 08 Dec 2023. Manifest updated 18 Dec 2023. SafeWork NSW Notification 21 Dec 2023.	CLOSED
Schedule 3, Condition 45 Except as expressly permitted by an EPL, the Applicant shall not cause, permit or allow any waste generated outside the site to be	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	WA to continue to apply the Authorised Waste Storage Plan and Clinical Waste Receipt and Storage	Weston Aluminium is committed to the ongoing implementation of the Authorised Waste Storage Plan	CLOSED

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Condition Number ID & Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Weston Aluminium Response	Action Status
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.	the EPL. This waste was reportedly destroyed by the fire event on 14 Nov 2021. No additional consignments of this waste type were observed to have been received in Weston Aluminium's reporting or weighbridge records.	Plan developed in collaboration with the EPA.	and Clinical Waste Receipt and Storage Plan, as developed in cooperation with the EPA.	
Schedule 4, Condition 57 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 Nov 2021 fire incident by email and via Major Projects Portal on 19 Nov 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 Jul 2022 and Jul 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.	Weston Aluminium has a clear understanding and appreciation of incident notification requirements, having adopted the meaning of an incident as described in the POEO Act.	No further action required.	CLOSED

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Table 3: Summary of Action Closure Status - 2023 Independent Environmental Audit (EPL 6423)

Condition Number ID & Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Weston Aluminium Response	Action Status
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 Nov 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, 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 Nov 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.	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.	Management of stormwater quality, containment and disposal via Trade Waste will continue in accordance with the established (post-fire event) protocol. Stormwater reuse opportunities on site (dust suppression and process cooling) are also being explored to improve future process sustainability.	CLOSED

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Condition Number ID & Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Weston Aluminium Response	Action Status
L4.1 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.	Auditors sighted waste tracking sheets provided by Weston Aluminium. Weston Aluminium'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 Jun 2021 and 18 Dec 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 Jan 2022. Weston Aluminium's 'Action Register – Nov 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.	Weston Aluminium 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.	Standard Operating Procedures have been developed and implemented in relation to waste receipt, QC inspection, handling and storage. A targeted training package has been developed and rolled-out to all staff to ensure familiarity with the NSW EPA Waste Classification Guidelines 2014. Training presentation prepared and delivered to applicable staff 19Jan24	CLOSED
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	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.	Refer comments above and below.	CLOSED

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Condition Number ID & Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Weston Aluminium Response	Action Status
Control Order in Relation to Aluminium Smelter Wastes containing Fluoride and/or Cyanide, 1986".				
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 Point 1 exceeds 1.4 milligrams per cubic metre.	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 Jul 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/m ³ .	No further action required.	The fluoride emission monitoring and control system has been restored and will continue to be operated and maintained in accordance with approval requirements.	CLOSED
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	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,	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	Signage installed 08 Dec 2023. Manifest updated 18 Dec 2023. SafeWork NSW Notification 21 Dec 2023.	CLOSED

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Condition Number ID & Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Weston Aluminium Response	Action Status
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.	the 2023 Hazard Audit by Advitech Pty Ltd was reviewed by auditors, which found the workshop DG cabinet was not appropriately labelled.	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.		
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 Jul 2022, 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 Jul 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).	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. No further action required.	Monitoring systems have been restored and monitoring programs will continue to be operated and scheduled in accordance with approval requirements.	CLOSED

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Condition Number ID & Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Weston Aluminium Response	Action Status
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 to update its internal compliance calendar to ensure this does not happen in future. No further action required.	The internal Compliance Calendar will continue to be implemented and updated (as required) to ensure reporting obligations and requirements are achieved and satisfied.	CLOSED

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Table 4: Summary of Action Closure Status - 2023 Independent Hazard Audit

Ref No.	Description / Issue	Finding(s) and Recommendations(s)	Priority	Allocation of Responsibility	Due Date	Comments	Action Status
01/2020 & 01/2023	Storage and Labelling of Packaging/Vessels Suitable for DG	Ensure packaging and vessel are properly stored in accord with Australian Standards and adequately labelled in relation to their contents at all times.	Medium	C. McClung	29 Dec 2023	Signage installed 08 Dec 2023. Manifest updated 18 Dec 2023. SafeWork NSW Notification 21 Dec 2023.	CLOSED
06/2020 & 02/2023	Understanding Potential Domino Effects	During a future risk assessment, quantify the consequence and risk associated with hazardous incident scenarios at the site. A Level 2 risk assessment consistent with the NSW Multi-level Risk Assessment Guideline (May 2011) is recommended. An understanding of the impact contours in relation to the broader development of the Kurri Kurri Industrial Park is considered prudent.	Medium	C. McClung	Undefined / Ongoing	A number of studies have performed as part of new SSD project Application, including whole-of site Fire Safety Study and Preliminary Hazard Analysis. Copies provided to DPE. Updated FSS and PHA (per DPE comment) have been prepared. WA considers that these studies present adequate, quantifiable risk and consequence profiling for the activities undertaken on site.	CLOSED
03/2023	Storage and handling of dangerous goods in accordance with all	Ensure that any changes to dangerous goods stores are externally verified as compliant with Australian Standards by a competent person	Medium	C. McClung	29 Feb 2024	As above, proposed broadening of DG storage has been assessed as part of a new SSD Project Application. FSS	CLOSED

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Ref No.	Description / Issue	Finding(s) and Recommendations(s)	Priority	Allocation of Responsibility	Due Date	Comments	Action Status
	relevant Australian Standards	(e.g. member of the Australasian Institute of Dangerous Goods Consultants) before being placed into operation.				and PHA verifies compliance of proposed DG stores with the ADG Code of Australia and AS1940 (2017).	
04/2023	Waste received at the site	Any material which arrives on site without a suitable, compliant storage location must be transported off-site to a suitable storage location as soon as possible	High	C. McClung	Ongoing	An Authorised Waste Storage Plan, Clinical Waste Receipt and Storage Plan, and Standard Operating Procedures have been developed for waste inspection, receipt and storage. Plans and procedures include a protocol for waste quarantine and rejection (return to generator / originator) for wastes that are non-confirming or not compatible with established storages.	CLOSED
05/2023	Waste received at the site	Prepare and implement a specific training program for all company personnel including management, operations, maintenance and contractors regarding the potential hazards of all accepted wastes and the severity of deviating from approved processes.	Low	C. McClung	29 Dec 2023	As above, proposed Class 3 storage is assessed as part of a new SSD Project Application, including whole-of site Fire Safety Study and Preliminary Hazard Analysis. Training scope and engagement of Industrial Chemists defined. Copies provided to DPE.	CLOSED

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Ref No.	Description / Issue	Finding(s) and Recommendations(s)	Priority	Allocation of Responsibility	Due Date	Comments	Action Status
06/2023	Waste received at the site	Review feasible options to increase suitably designed dangerous goods storage capacity for all approved waste streams, to the extent that the site layout and infrastructure safely permits.	Low	C. McClung	29 Dec 2023	As above, proposed Dangerous Goods storage has been assessed as part of a new SSD Project Application, including whole-of site Fire Safety Study and Preliminary Hazard Analysis. Layout and storage infrastructure design and protocols defined. Updated FSS and PHA (per DPE comment) have been prepared.	CLOSED

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8. COMPLAINTS

Two (2) discrete complaints (noise and/or odour) were received via the NSW EPA (by anonymous complainants) during the 2024-25 Compliance Reporting Period and are summarised below in **Table 5**.

Table 5: Summary of Complaints – 2024-25 Reporting Period.

Nature of Complaint	# of Complaints received by WA	# of Complainants	# of Complaints attributable to WA
Odour	1	1	0
Visible Emission	0	0	0
Noise	0	0	0
Noise & Odour	1	1	0
Other	0	0	0
Total	2	2	0

The following comments are made in relation to complaints received during the Reporting Period:

- No operational- or maintenance-related issues were experienced or reported during each of the complaint events. Of the complaints received, none could be attributable to Weston Aluminium operations;
- Written summaries of complaint particulars, possible contributing factors, and actions taken by Weston Aluminium (where applicable) were provided to the NSW EPA (Hunter Region) following the receipt of each complaint;
- Weston Aluminium has received occasional noise complaints over the past 5-years in relation to an intermittent and excessive air-blowing / high-velocity air noise. Following investigation on each occasion, these noise complaints could not be attributed to Weston Aluminium. Weston Aluminium does operate a number of motors and fans associated with air emissions control and such systems are operational continuously throughout each week (i.e. not intermittently), however the operation of these plant and equipment is not typically associated with excessive noise and is not detectible beyond the property boundary. A nearby independent industrial operation (also on Mitchell Avenue) is considered to be the likely source of the excessive air blowing / high-velocity noise; and
- No other particular trends in complaint behaviour / observation are noted.

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Weston Aluminium continues to operate and maintain its plant and equipment in accordance with manufacturer's specification and preventative maintenance requirements. Staff members continue to make observations of local odour, air quality and noise issues, and are instructed to document any findings to ascertain / confirm potential source(s).

No further action is considered in relation to noise or odour.

9. MONITORING TRENDS

A comparison of 2024-25 air emission monitoring results with regulatory limits and historical assessment predictions is provided in **Appendix B**. Commentary regarding the trending of air emissions control performance as well as comparisons with assessment predictions is also provided therein.

A summary of findings is given below:

- Monitoring performed during the 2024-25 Compliance Reporting period confirmed full compliance with regulatory limits for all parameters at all monitoring points;
- Emission concentrations reported during the 2024-25 reporting period were generally lower or consistent with historical levels;
- Comparisons between assessment predictions (published in historical environmental assessments) and emission performance data (obtained during the reporting period) reveals the following:
 - The arsenic result for EPL Point 13 was marginally above the 2001 EIS prediction (0.00033 vs 0.0002 mg/m³); and
 - All other air emission monitoring results were either below concentrations predicted or had a result less than the analytical limit of detection.

Weston Aluminium is committed to operating and maintaining its plant and equipment in a responsible, effective and competent manner, and to maintaining full compliance with regulatory air quality limit criteria.

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10. FURTHER IMPROVEMENTS IN ENVIRONMENTAL PERFORMANCE

The following measures will be implemented during the subsequent 2025-26 Compliance Reporting period to maintain ongoing regulatory compliance, and to further improve the environmental performance of the development.

- Whilst some feasibility issues exist, Weston Aluminium will continue to explore available upgrades to existing lime scrubbing dosing systems to reduce or eliminate the accumulation of lime residues within the furnaces' pollution control system. This will reduce or eliminate the quantity of unreacted lime that is typically lost to landfill disposal;
- Continue to explore opportunities for the reuse of captured surface waters (e.g. hardstand and/or mobile plant washdown), thus achieving sustainable diversion of water from trade waste disposal;
- Following the regulatory approval of an SSD application sought to repurpose the former Aldex Building, upgrade fabric filters within Baghouse 7 from a conventional to a pleated (higher surface area) fabric design; and
- Seek regulatory approvals for the reinstatement of a second rotary furnace (destroyed and deleted in response to the November 2021 premises fire), and the installation and operation of a new air emissions scrubber-fabric filter baghouse for dedicated servicing of reverberatory furnace (scrap remelt) operations.

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APPENDIX A

COMPLIANCE TABLE

ID NO.	COMPLIANCE REQUIREMENT (MOD 15)	DEVELOPMENT PHASE	LEAD TIME	MONITORING METHODOLOGY	EVIDENCE REQUIRED	RECEIVING AUTHORITY/DEPARTMENT	EVIDENCE AND COMMENTS	COMPLIANCE STATUS
Schedule 2 Condition 1	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.	All Development stages	At all times	Implementation of CEMP and OEMP and adherence to management and mitigation commitments.	Incident reports. Incident Notification. Historical AEMRs. Annual Compliance Reporting	Department of Planning, Housing & Infrastructure & Environment (DPHI), NSW Environment Protection Authority (EPA) and Cessnock City Council (CCC), as required.	Mature Standard Operating Procedures, operator competency training, Environmental Management System, Environmental Management Plans, routine testing and inspection and Preventative Maintenance Program implemented. Plans updated to reflect Modifications to operations, activities and any changes to environmental aspects, as required. Strong compliance and high standard of environmental management history. Certification to ISO14001 achieved 2019 and maintained since.	Compliant
Schedule 2 Condition 2	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 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, prepare by Weston Aluminium and the Response to Submissions, dated 15 July 2015, prepared by Weston Aluminium. j) 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 and the letter dated 29 July 2021 prepared by Todoroski Air Sciences. m) Modification application DA-86-04-01-MOD-15 and the enclosed Modification Report dated 9 June 2023 prepared by AECOM as amended by the Response to Submissions Report dated 12 October 2023 prepared by AECOM n) The modification as described in the Modification Report prepared by AECOM titled Modification Report Weston Aluminium - Concurrent Operations dated 18 March 2024 as amended by Response to Submissions Report Weston Aluminium - Concurrent Furnace Operations prepared by AECOM and dated 7 June 2024 as amended by the letter titled Re: Weston Aluminium - Further to Response to Submissions by Todoroski Air Sciences and dated 25 July 2024 If there is any inconsistency between the above, the conditions of this approval shall prevail to the extent of any inconsistency.	All Development stages	At all times	Implementation and monitoring of design, management and mitigation measure commitments and performance. Annual Returns. Compliance Monitoring and Reporting. This tool.		DPHI and/or EPA, as applicable	Development and associated Modifications undertaken in accordance with Development Applications and associated Environmental Assessments. Management and Mitigation measures incorporated into Operational Environmental Management Plan, and updated as required, or as part of Change Management.	Compliant
Schedule 2 Condition 3	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.	All Development stages	At all times	Implementation and monitoring in accordance with strategies and plans	Compliance Reporting	DPHI and/or EPA, as applicable	Plan / Strategy updates performed in accordance with Department requirements (refer Modifications).	Compliant
Schedule 2 Condition 4	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.	Construction and Operation	Prior to commencement of construction and commencement of Operational Phase	Notification to Department	Written Notification to Department	DPHI (and predecessors)	COMPLETED. Notification requirements associated with historical Modifications satisfied. Updated Air Quality Monitoring Program, outlining reconfigured operations (concurrent furnace operation) provided via MP Portal 12Nov24.	Compliant
Schedule 2 Condition 5	The Applicant shall not process on site more than a combined total of 40,000 tonnes of dross aluminium, SPL, General Solid Waste (consumer product waste) and illicit and pharmaceutical waste and 35,000 tonnes of scrap aluminium metal per year.	Operational	Annual (historically reported as part of AEMR; coinciding with EPL anniversary (19 Dec - 18 Dec).	AEMR (historically (pre-2019) and now Compliance Monitoring	Compliance Reporting	Historically DPE, EPA and CCC. Now DPHI	Historically fully Compliant. Current Reporting period - well-below limits (Reporting Period 03 Aug23 -02 Aug24): Combined dross, SPL, GSW, illicit and pharma waste: 3,343 T (vs limit of 40,000T). No SPL processed since Mar 2020. Scrap aluminium processed: 7,996 T (vs limit of 35,000T).	Compliant
Schedule 2 Condition 5A	The Applicant shall not process on site more than 2,000 tonnes of pharmaceutical waste and 5 tonnes of illicit drug waste per year.	Operational	Annual (historically reported as part of AEMR; coinciding with EPL anniversary (19 Dec - 18 Dec).	AEMR (historically (pre-2019) and now Compliance Monitoring	Compliance Reporting	Historically DPE, EPA and CCC. Now DPHI	Illicit waste processed: 4.3 T; Pharmaceutical Waste: 0 T. Pharmaceutical wastes were diverted to the Thermal Processing Facility (independent Consent; SSD 7396) during the Reporting Period to support final commissioning and operational activities.	Compliant
Schedule 2 Condition 5B	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.	Operational	At all times	SOPs and training. Operational Data Sheets and SiteTracker	Operational Data Sheets Excursions to be reported via Compliance Reporting.	DPHI	No co-processing of pharmaceutical and/or illicit drug wastes with dross occurred during the Reporting Period.	Compliant
Schedule 2 Condition 5C	The Applicant must not process liquid pharmaceutical or illicit drug waste unless approval is granted by the EPA.	Operational	Following commencement of MOD 12	Operations coordination and recommencement following Consent and EPL Variation issue.	Thermal Processing Assessment per Condition E2 of EPL required to support EPL Variation Application.	EPA	Approval gained 2023, though no Pharmaceutical Waste processed occurred in the Rotary Furnace during the reporting period (refer above).	Compliant
Schedule 2 Condition 6	The Applicant shall not process more than 15,000 tonnes per year of dross aluminium sourced from overseas smelters and secondary aluminium processors.	Operational	At all times	Weighbridge reporting database, Rotary Furnace Operational Sheets and SiteTracker Database	Internal reporting	DPHI	No overseas dross has been processed since 2011 (clean-slating of NZ Dross). Secondary dross processing has historically and consistently been well-below 15,000 tpa limit. Total dross (primary and secondary sources) quantities processed during the Reporting Period was 2,179 T	Compliant
Schedule 2 Condition 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.	Operational	At all times	Monthly stocktaking records	Stocktake records and photographs	DPHI & EPA (for SPL - as part of Environmentally Hazardous Chemicals Act Licence reporting obligations)	No SPL processed since Mar 2020. Zero SPL stocks on site beyond Mar 2020. Max aluminium dross storage during Reporting Period: 347 T.	Compliant
Schedule 2 Condition 6AA	The Applicant must ensure that not more than 250 tonnes of General Solid Waste (consumer product waste) is stored onsite at any one time.	Operational	At all times	Monthly stocktaking records	Stocktake records	DPHI	Inputs typically shredded on demand, and immediately upon receipt. Max consumer product waste stored during Reporting Period: 46 T	Compliant
Schedule 2 Condition 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.	Operational (during 12-mth Trial)	For duration of Mod 8 Trial program. Reporting as part of Monitoring & Verification Report (following Trial completion)	Furnace Operational Sheets, SiteTracker Database, Weighbridge database and monthly Stocktake records	Furnace Operational Sheets, SiteTracker Database, Weighbridge database and monthly Stocktake records and photographs	DPHI, EPA, CCC	COMPLETED. Trial performed Aug 2015 - Apr 2016 (< 12 months). Total tonnage delivered and processed: 352 tonnes. Stock quantity limit (<1,000 tonnes at any time) satisfied. Reported as part of Monitoring & Verification Report (20 May 2016). Regulatory approval for the Mixed SPL Processing Trial was granted by the NSW Department of Planning & Environment and the NSW Environmental Protection Authority (EPA) on 17 Feb 2013 and 15 Mar 2013 respectively. A variation to our Environmental Protection Licence (EPL) was subsequently sought from the EPA to improve the consistency of EPL wording with that of the Development Consent (approved 10 Jul 2014). Sourcing constraints.	Compliant
Schedule 2 Condition 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 b) during the operation of DA 86-01-01 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.	Operational (during 24-mth Trial)	For duration of Mod 9 Trial program. Reporting as part of Monitoring & Verification Report (following Trial completion)	Furnace Operational Sheets, SiteTracker Database, Weighbridge database and monthly Stocktake records	Furnace Operational Sheets, SiteTracker Database, Weighbridge database and monthly Stocktake records and photographs	DPHI, EPA, CCC	COMPLETED. Trial performed Dec 2015 - Oct 2017 (<24 months). 1.9 tonnes illicit drugs received and processed during the Trial. 141 tonnes of pharmaceutical drugs received, stored and processed during Trial. Reported as part of Monitoring & Verification Report (10 Nov 2017).	Compliant
Schedule 2 Condition 7	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.	All Development stages	As required by the Planning Secretary	Compliance Reporting	Management Plan / Monitoring Program	DPHI, EPA, CCC, as required	Updates of the Air Quality Monitoring Plan is required within 1 month of Mod 16 commencement. Mod 16 approval 17 October 2024. Variation to EPA Licence prepared in consultation with NSW EPA (including monitoring arrangements; 17 Oct 2024). Updated AQMP submitted to the Planning Secretary on 12 Nov 2024.	Compliant
Schedule 2 Condition 8	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.	Within six-months of Mod 3 commencement	Within six-months of Mod 3 commencement	Engagement of PCA (AcroCert)	Building Certification	DPHI	COMPLETED. Certification conducted by AcroCert as nominated PCA and issued to DPE (24 Jul 2008). Building Certificate (CCC-issued) also held in archives dated 21 Jul 2010. Original Construction Consent Certificates (80161001 & 80161002) issued 27 Sep 2001 and 10 Oct 2001.	Compliant
Schedule 2 Condition 9	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. Notes: • Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	Construction	Prior to commencement of operations				COMPLETED. Refer Archives (circa 1998)	Compliant
Schedule 2 Condition 10	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.	Operational	At all times	Maintenance Database. Equipment supplier specifications	Maintenance Database		MEX Maintenance system - Asset Register and Preventative Maintenance programs developed, implemented and plant operated in accordance with Australian Standards and equipment supplier requirements / specifications.	Compliant
Schedule 2 Condition 10A	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.	Prior to Mod 8 commencement (EPL) and 1 week prior to commencement and within 2 weeks of conclusion of Trial (Notification)	Prior to Mod 8 commencement (EPL) and 1 week prior to commencement and within 2 weeks of conclusion of Trial (Notification)		EPL variation issue and written notification	DPHI, EPA and CCC	COMPLETED. Regulatory approval for the Mixed SPL Processing Trial was granted by the NSW Department of Planning & Environment and the NSW Environmental Protection Authority (EPA) on 17 Feb 2013 and 15 Mar 2013 respectively. A variation to our Environmental Protection Licence (EPL) was subsequently sought from the EPA to improve the consistency of EPL wording with that of the Development Consent (approved 10 Jul 2014). Notification to Authorities provided 14 Oct 2015 (Trial Commencement) and 12 May 2016 (Trial conclusion).	Compliant
Schedule 2 Condition 10B	Prior to the commencement of the 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.	Prior to Mod 9 commencement (EPL) and 1 week prior to commencement and within 2 weeks of conclusion of Trial (Notification)	Prior to Mod 9 commencement (EPL) and 1 week prior to commencement and within 2 weeks of conclusion of Trial (Notification)		EPL variation issue and written notification	DPHI, EPA and CCC	COMPLETED. EPL Variation received 01 Oct 2015 (Notice 1534264). Email Notification to Authorities by email 29 Sep 2015 (commencement) and 07 Nov 2017 (conclusion).	Compliant
Schedule 3 Condition 11	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.	Operational	At all times	Real-time, continuous emissions monitoring systems, routine (independent) compliance stack emissions monitoring.	Emissions monitoring Reports, Compliance Reporting, Annual Returns	DPHI and EPA, as required	Strong history of air emissions compliance performance. Pollution Control Systems (baghouses and baghouse-scrubbers) and associated monitoring systems operated and maintained in accordance with manufacturer's requirements. Filters changed routinely. Strong history of compliance achieved (refer former AEMR, Annual Returns, Compliance Reporting). Compliance stack testing conducted by independent provider in accordance with EPL requirements. No exceedences occurred during the Reporting Period.	Compliant

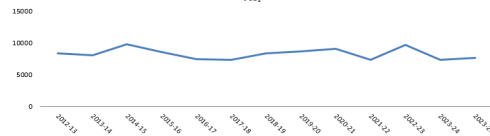
COMPLIANCE TABLE

ID NO.	COMPLIANCE REQUIREMENT (MOD 15)	DEVELOPMENT PHASE	LEAD TIME	MONITORING METHODOLOGY	EVIDENCE REQUIRED	RECEIVING AUTHORITY/DEPARTMENT	EVIDENCE AND COMMENTS	COMPLIANCE STATUS																																		
Schedule 3 Condition 12	Prior to the commencement of DA 86-04-01 Mod 14, The Applicant must increase the height of Stack 1 from 20 metres to 30 metres.	Construction of Mod 14	Prior to commencement of operations			EPA	COMPLETED. The original Stack 1 (20 m height) was demolished and replaced with a new 30 m stack as part of Mod 14 construction works. Pre-operational notification of works completion to NSW EPA 25Jul22.	Compliant																																		
Schedule 3 Condition 13	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 16; 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.	Operational	Within 1 month of commencement of Mod 12		EPA advice re: recommended conditions of Approval - defining Mod requirements. Formal submission of updated AQMP	DPHI	AQMP update prepared Nov24 to reflect concurrent furnace operations and submitted to MP Portal 12Nov24 (following EPA Variation request 17Oct24; and subsequent RFIs). All amonitoring is undertaken in accordance with the AQMP.	Compliant																																		
Schedule 3 Condition 13A	Within 12 months of commencement of DA 86-04-01 Mod 12, the PApplicant must prepare, to the satisfaction of the Planning Secretary, and submit to the EPA, and Air Emissions Verification Report. The Air Emissions Verification Report must include: a) air emissions 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 <i>Protection of the Operations (Clean Air) Regulation 2010</i> .	Operational	Within 12 months of commencement of DA 86-04-01 Mod 12			DPHI and EPA	COMPLETED. AEVR submitted to DPE and EPA 16 Dec 2020. Approved by DPE 10 Mar 2021.	Compliant																																		
Schedule 3 Condition 14	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.	Construction and Operational	At all times	Discharge point design, construction and operation (routine compliance monitoring)	Emissions monitoring reports, describing stack dimensions, configuration and flow parameters	N/A	All discharge points constructed and operated in accordance with planning assessments and EPL requirements.	Compliant																																		
Schedule 3 Condition 15	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	At all times	Routine inspection		Upon request	COMPLETED. Traffic management commitments defined in original EIS (1996), subsequent assessments and Management Plans have been adhered to. Vehicle washbay used for wheel washing, as required. WA staff monitor adherence in regards to load and vehicle management (per NHVR (National Heavy Vehicle Regulator) requirements on an ongoing basis.	Compliant																																		
Schedule 3 Condition 16	The Applicant shall implement all reasonable and feasible measures to minimise the dust generated by the development.	All Development stages	At all times	Routine inspection	Routine inspection and housekeeping records	N/A	Process and production areas are enclosed within buildings and ventilated to fabric filter dust collectors. Clean emissions are discharged via respective stacks. Internal and external housekeeping is performed routinely to mitigate dust generation from trafficable and/or storage areas. Mobile sweepers used routinely in processing and trafficable areas throughout the site.	Compliant																																		
Schedule 3 Condition 17	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.	Operational	Within 3 months of Mod 3 commencement		Confirmation to DPE (DoP)	DPHI	COMPLETED. Mod 3 determined 4 Sep 2009; commencement of Mod 3 date to be confirmed. Confirmation of curtain installation by end Nov 2009 provided 12 Apr 2010 as part of responses to DoP Orders.	Compliant																																		
Schedule 3 Condition 18	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.	Operational	Within 6 months of Mod 3 commencement		Confirmation to DPE (DoP)	DPHI	COMPLETED. Confirmation provided 12 Apr 2010 and 27 Jul 2010 (delayed installation and commissioning program explained). Commencement of operations occurred 23 Jul 2010 (per 27 Jul 2010 correspondence).	Compliant																																		
Schedule 3 Condition 19	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.	Operational	Within 9 months of Mod 3 commencement	Assessment of Baghouse 7 emissions control performance upon commissioning	Confirmation of Baghouse 7 performance	DPHI	COMPLETED. Confirmation provided 17 Sep 2010 of compliance Baghouse 7 emissions control performance. Confirmation that Baghouse 3 relocation will not be required. DPI letter received 23 Dec 2010 acknowledging BH7 emissions control performance, no requirement to relocate BH3, and confirmation of Condition satisfisfaction.	Compliant																																		
Schedule 3 Condition 20	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.	Operational	Within 6 months of Mod 3 commencement		Written confirmation of ducting arrangement modification	DPHI	COMPLETED. Confirmation of ducting decommissioning and removal between Aldex Building and Baghouse 2 provided 27 Jul 2010 (Item 5). Baghouse 2 was destroyed by fire in 2021.	Compliant																																		
Schedule 3 Condition 21	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.	Operational	At all times	Real-time emissions monitoring system	System operation	DPHI	Real-time, continuous fluoride emissions monitoring system installed at Discharge Point 1 (Stack 1). Controlled by Citect PLC (fluoride conc, lime slurry density, fluoride monitor signal strength, duct and BH temps, etc.). EPL defines hourly average limit of 1.4 mg/m³ and instantaneous limit of 2 mg/m³. Visible and audible alarms activate conservatively at an instantaneous fluoride concentration of 1.2 mg/m³. Lime slurry sprays activated from 0.6 mg/m³ to effect early control. No exceedances reported during the Compliance Reporting Period.	Compliant																																		
Schedule 3 Condition 22	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.	Operational	At all times	Real-time emissions monitoring system	Monitoring data history	N/A	In event of approaching instantaneous and/or hourly average limits, furnace operations are idled and burners lowered until fluoride concentration lowered; also allowing Maintenance intervention (e.g. lime blockage), as required. This operating protocol is reflected in Standard Operating Procedures and reinforced by Environmental Bulletins. No exceedances reported during Compliance Period.	Compliant																																		
Schedule 3 Condition 23	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.	Operational	At all times	Real-time emissions monitoring systems (all stacks, excluding Stack 6)	Monitoring data history	DPHI, EPA and CCC	Real-time, continuous particulate monitors are used for broken bag detection associated with Baghouses / Stacks 1, 4 and 7 (Note: Stacks 2 and 3 were destroyed by the 2021 premises fire, and in response to modified operations, were not replaced; Stack 5 is no longer associated with conventional activities). Full compliance achieved during the Reporting Period. Strong history of air emissions compliance performance. No broken bags were detected during the Reporting Period, and routine, independence compliance emissions testing verifies compliance with particulate limit requirements for all stacks. Full compliance during the Reporting Period. 	Compliant																																		
Schedule 3 Condition 23A	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.	Operational	At all times	Standard Operating Protocols. Incoming waste receipt and storage inspections.	Inspection Sheets		No SPL received since March 2020 (prior to current Reporting Period). Nevertheless, all historical SPL consignments were stored undercover to prevent windblown dust and contact with stormwater.	Compliant																																		
Schedule 3 Condition 23B	General Solid Waste (consumer product waste) associated with DA-86-04-01-Mod-15 must be stored and processed in an enclosed building at all times.	Operational	At all times	Standard Operating Protocols. Incoming waste receipt and storage inspections.	Inspection Sheets		All consumer product wastes received were stored and processed within an enclosed building during the reporting period. Shredding commenced April 2024.	Compliant																																		
Schedule 3 Condition 24	The Applicant shall participate and implement recommendations from any regional Health Impact Assessment to the satisfaction of the Planning Secretary.	Operational					Regional Health Impact Assessments have not been sought to date. WA will participate in the event of future Health Impact Assessment being sought.	Not triggered																																		
Schedule 3 Condition 25	Except as may be expressly provided in an EPL for the development, the Applicant shall comply with Section 120 of the <i>Protection of the Environment Operations Act 1997</i> .	All Development stages	At all times	EPL monitoring	Monitoring data history	DPHI and EPA	No discharges to the environment occurred during the reporting period. All site process-related and stormwater flows (clean and potentially contaminated) are captured in the sites Main Pond and continue to be discharged to Trade Waste under Agreement with Hunter Water.	Compliant																																		
Schedule 3 Condition 25A	All pharmaceutical waste must be stored in an enclosed (appropriately bunded and covered) area to prevent the contamination of stormwater.	Operational (Mod 9 and Mod 12)	At all times	Routine site inspections. Protocols followed for receipt and storage of pharmaceuticals in accordance with SOP.	Stocktake records and photos, weekly Enviro Inspection records		In accordance with SOPs, process inputs are stored and handled within Process Buildings, preventing the contamination of stormwater. During the Reporting Period, all wastes were stored within enclosed and appropriately bunded areas to prevent the potential contamination of stormwater. Storage requirements are defined, in conjunction with EPA, through the development of an Authorised Waste Storage Plan and Clinical Waste Receipt and Storage Plan. E & S controls installed and maintained in accordance with the original EISs (1996 and 2001) and Erosion, Sediment and Water Management Plan (1997) - approved by EPA 17 Jul 97. Stormwater network and Main Pond continues to manage stormwater flows. Main Pond and network of Pits are routinely cleared as part of Preventative Maintenance Program. Following the November 2021 fire event, improvements were made to the network, including earthworks to increase containment freeboard, isolation of the bypass chamber, dredging of the Pond Forebay, installation of screens on stormwater inlets/pits, management of fire wastes (consolidation, tarping, boom installation, and subsequent offsite disposal), installation of secondary containment booms, and formalisation of Trade Waste discharge arrangements. Control systems continue to be maintained.	Compliant																																		
Schedule 3 Condition 26	Prior to commencement of construction, the Applicant shall implement erosion and sediment controls in accordance with the Department of Housing and Landcom's <i>Managing Urban Stormwater: Soils and Construction</i> .	Construction	Prior to Construction	Site inspections			COMPLETED. CEMP and OEMP prepared as part of 2001 EIS. Plans prepared byt Boyden & Partners 03 May 1997 and approved by EPA, CCC and DLWC. Plans reflected therein and implemented.	Compliant																																		
Schedule 3 Condition 27	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.	Pre-Construction	Prior to Construction					Compliant																																		
Schedule 3 Condition 28	The Applicant shall comply with the restrictions in Table 3, unless otherwise agreed by the Planning Secretary. <table data-bbox="204 1518 572 1560"><caption>Table 3: Construction Hours for the Development</caption><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>N/A</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.	Activity	Day	Time	Construction	Monday – Friday	7:00am to 6:00pm		Saturday	8:00am to 1:00pm		Sunday and Public Holidays	N/A	Construction	At all times	CEMP implementation			No construction works undertaken during reporting period.	Not triggered																						
Activity	Day	Time																																								
Construction	Monday – Friday	7:00am to 6:00pm																																								
	Saturday	8:00am to 1:00pm																																								
	Sunday and Public Holidays	N/A																																								
Schedule 3 Condition 29	The Applicant shall ensure that the noise from the operation of the development does not exceed the noise limits presented in Table 4. <table data-bbox="204 1623 572 1728"><caption>Table 4: Development Noise Limits (dB(A))</caption><tr><th rowspan="2">Location</th><th colspan="2">Daytime</th><th colspan="2">Evening</th><th colspan="2">Night time</th></tr><tr><th>Maximum (dB(A))</th><th>Limit (dB(A))</th><th>Maximum (dB(A))</th><th>Limit (dB(A))</th><th>Maximum (dB(A))</th><th>Limit (dB(A))</th></tr><tr><td>Residences at the corner of Government Street and 10th Street</td><td>48</td><td>48</td><td>40</td><td>40</td><td>47</td><td>37</td></tr><tr><td>Residences on Northcote Street</td><td>44</td><td>44</td><td>-</td><td>44</td><td>40</td><td>37</td></tr><tr><td>Residences in the Light Industrial Zone on Mitchell Avenue and Railway Road</td><td>43</td><td>43</td><td>-</td><td>43</td><td>41</td><td>35</td></tr></table> Note: Condition 30 of this consent does not impose maximum allowable noise limits for residences on Horton Road and McCarra Road as the Applicant has established a registered agreement with the landowner of those properties in regard to noise.	Location	Daytime		Evening		Night time		Maximum (dB(A))	Limit (dB(A))	Maximum (dB(A))	Limit (dB(A))	Maximum (dB(A))	Limit (dB(A))	Residences at the corner of Government Street and 10 th Street	48	48	40	40	47	37	Residences on Northcote Street	44	44	-	44	40	37	Residences in the Light Industrial Zone on Mitchell Avenue and Railway Road	43	43	-	43	41	35	Operational	At all times	Independent Noise Surveys performed in accordance with EPL requirements and frequency	Noise Monitoring Reports	EPA (accompany Annual Return)	Monitoring is performed on a triennial basis in accordance with EPL requirements - both attended monitoring and modelling assessment. Strong compliance achieved to date. Monitoring performed 9 - 10 October 2024. Assessment survey confirmed full compliance with noise limits at all monitoring locations. Predictive (modelling) assessment results were consistent with direct measurements performed. The next triennial monitoring event is scheduled to occur during October 2027, and will be reported as part of the 2027-28 Compliance Report.	Compliant
Location	Daytime		Evening		Night time																																					
	Maximum (dB(A))	Limit (dB(A))	Maximum (dB(A))	Limit (dB(A))	Maximum (dB(A))	Limit (dB(A))																																				
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Residences in the Light Industrial Zone on Mitchell Avenue and Railway Road	43	43	-	43	41	35																																				
Schedule 3 Condition 30	The Applicant shall ensure that trucks are not entering and leaving the site outside the hours of 7.00am to 10.00pm.	Operational	At all times	Contract arrangements, weighbridge manning hours and Main Gate closure			Truck access and egress from the site typically limited to 7am - 5pm Monday to Friday. Occasionally trucks may access and exit site as late as 6pm by special arrangement only. Typically, no weekend deliveries or outings. Main Gate opening hours typically restricted to 7:00am - 5:00pm, Monday - Friday.	Compliant																																		
Schedule 3 Condition 30A	All doors adjacent to the briquetting plant are to be closed at all times.	Operational	At all times				COMPLETED. Doors remained closed at all times during Briquetting Plant operations. Briquetting Plant decommissioned and removed in 2020. No noise issues or complaints historically in relation to Briquetting Plant operation. Condition no longer relevant.	Compliant																																		
Schedule 3 Condition 31	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 noise limits specified in Condition 28 and management measures to address any exceedances.	Operational	Prior to commencement of operations		Noise Monitoring Program development	EPA and DPHI	COMPLETED. Monitoring methodology defined as part of OEMP development (2001). Agreed Monitoring methodology is reflected in Noise Compliance Study Reports, which includes attended monitoring and modelling assessment.	Compliant																																		
Schedule 3 Condition 31A	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.	Operational	Following commencement of Briquetting plant (Mod 5)	Compliance noise monitoring	Compliance noise moitoring reports		COMPLETED. No exceedances to date as a result of Mod 5 activities. Therefore, no requirement to enclose concrete slab. Update: Briquetting Plant decommissioned in 2020. Condition no longer relevant.	Compliant																																		

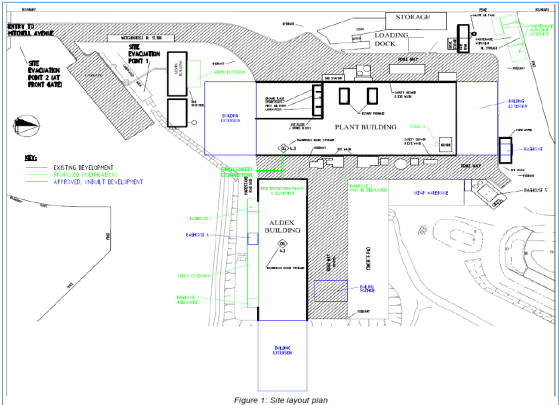
COMPLIANCE TABLE

ID NO.	COMPLIANCE REQUIREMENT (MOD 15)	DEVELOPMENT PHASE	LEAD TIME	MONITORING METHODOLOGY	EVIDENCE REQUIRED	RECEIVING AUTHORITY/DEPARTMENT	EVIDENCE AND COMMENTS	COMPLIANCE STATUS
Schedule 3 Condition 32	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.	Pre-Construction	Prior to commencement of construction		Study preparations	DPHI	COMPLETED. Studies undertaken by Steve Sylvester (Granherne) as part of original Development. HAZOP, FHA, Fire Safety Study and Transport Risk Assessment Study forwarded to DUAP 09 Apr 1997. DUAP approved 28 Apr 1997. Studies subsequently updated in accordance with Modifications/SSD Approval requirements. All updated studies prepared and issued to DPE (Jan-Feb 19). CSS approved 15 Mar 2019. FHA approved 10 May 2019. FSS updated (as single, stand-alone document) to reflect DPE review comments (7 May 2019), and submitted 26 Nov 2019 (Approved by DPE 16 Jan 20). HAZOP updated per DPE comments (07 May 2019) and submitted 23 Dec 2019. HAZOP approved by DPE (16 Dec 2020; inadvertent delay with written approval).	Compliant
Schedule 3 Condition 33	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 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-comissioning	2 months prior to commissioning of original Development				COMPLETED. Refer archives.	Compliant
Schedule 3 Condition 34	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 Rescues, 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.	Pre-operational	Propr to commencement of operations				COMPLETED. The original intent was to facilitate molten aluminum transfers between Weston Aluminium and Hydro Aluminium Kurri Kurri (then VAW). Transfer of molten alumnium was not performed however, and is no longer part of the Development. Hydro Aluminium closure occurred in 2011.	Not triggered
Schedule 3 Condition 35	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.	Operational	At all times		Protocol and Inspection records	Available upon request	COMPLETED. Dross inspection protocol developed (2002) and implemented for first 10 batches of dross delivered (NZAS dross).	Compliant
Schedule 3 Condition 36	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 <i>Bunding and Spill Management</i> .	Operational	At all times				Plant Building dross/SPL storage bunkers designed in accordance with AS requirements. Structures roofed and bunded. Diesel facility bund also designed and constructed with >110% capacity of the tank (earlier 5,000L, then 8,000L, now 12,000L UST; approx 21,000L capacity bund). 2023 upgrade to tank to self-bunded 12,000L tank, which is still accommodated within the original bund for back-up containment. Secondary diesel storage facility in scrap yard (6,000L; removed 2023) was similarly a self-bunded design, and AS compliant). DG Notification and updates, as required, provided to SafeWork NSW, including designation of Depots, development of Manifest (contacts, site plans, SDSs, Risk Assessments and DG Register). Last Notification update Oct 2024. Manifest held in HAZCHEM cabinet at site entrance. In accordance with SOPs, process inputs are stored and handled within Process Buildings, preventing the contamination of stormwater. During the Reporting Period, all wastes were stored within enclosed and appropriately bunded areas to prevent the potential contamination of stormwater. Storage requirements have been defined, in conjunction with EPA, through the development of an Authorised Waste Storage Plan and Clinical Waste Receipt and Storage Plan.	Compliant
Schedule 3 Condition 37	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.	Operational	Commencement of Mod 3		Annual Fire Safety Certification	CCC - annual basis (21 July anniversary)	COMPLETED. Emergency stops, alarms and associated signage installed in both Plant and Aldex Buildings following Mod 3. Conveyor motor had overtemperature sensor, and will stop in event of fire. Systems inspected routineley and form part of the Fire Safety Measures assessed and certified annually in accordance with CCC's schedule. Physical connections between the Plant and Aldex Buildings were subsequently removed in 2014. Condition no longer relevant. Thereafter, buildings have been treated as isolated buildings.	Compliant
Schedule 3 Condition 37B	The Applicant must ensure that the shredder associated with DA-86-04-01-Mod-15 is located: (a) Located within the blue areas as shown on the layout plan in Appendix A (b) located more than 30 m from a Class 3 dangerous goods handling or storage area; and (c) cleaned daily.	Operational	At all times beyond Mod-15 commencement	Routine inspection			Shredder operations are limited to blue shaded areas only. Class 3 DG wastes are stored within Class 3 self-bunded and lockable storage containers located in the eastern end of the Yard, which is a minimum >50 m from shredding operations. Shredder continues to be inspected and cleaned daily.	Compliant
Schedule 3 Condition 38	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).	Operational	At all times				COMPLETED. Original intent was to facilitate molten aluminum transfers between Weston Aluminium and Hydro Aluminium Kurri Kurri (then VAW). Transfer of molten alumnium was not performed and is no longer part of the Development. Hydro Aluminium closure occurred in 2011.	Not triggered
Schedule 3 Condition 39	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.	All Development stages	At all times				40 parking spaces provisioned 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 to ensure that no queuing on the public road network occurs.	Compliant
Schedule 3 Condition 40	During the development, the Applicant shall ensure that the development does not result in any vehicles queuing on the public road network.	All Development stages	At all times	Site Induction. Instruction to transport contractors.			As above, sufficient parking available on site. No parking occurs on Mitchell Avenue or any other public road. No queuing on the public road network occurs. Queuing upon entry / exit and movements are managed by Weighbridge Staff. No breaches detected during the Reporting Period.	Compliant
Schedule 3 Condition 41	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 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.	Pre-operational	Prior to commencement of coperation			DPHI	Original Transport Code of Conduct prepared 2002. Transport Risk Assessment Study prepared for original development 1997 and forwarded to the then DUAP 09 Apr 97. DUAP approval received 28 Apr 97. Code of Conduct forms part of OEMP. Transport Code of Conduct (Route Selection) updated as part of Safety Management System updates. Should significant changes to site activities / layout occur, this Transport Code of Conduct will again be updated. Code of Conduct also reflected in the site's Transport Contractor Induction Package (which is reviewed and updated routinely).	Compliant
Schedule 3 Condition 42	The Applicant shall ensure that the lighting associated with the development: a) complies with the latest version of Australian Standard AS 4282(INT) - <i>Control of Obtrusive Effects of Outdoor Lighting</i> ; 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.	All Development stages	At all times				External floodlighting installed in such a way as to be sensitive to neighbouring landuse and public roadways. Lighting aimed at ground in trafficable areas within the site. Lighting is not considered obtrusive from Mitchell Avenue view.	Compliant
Schedule 3 Condition 43	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.	Pre-Construction	Prior to commencement of construction				COMPLETED. Landscape Management Plan prepared as part of 2001 CEMP. Considered as part of subsequent Modifications, as applicable, and for consistency with the Asset Protection Zone (APZ) developed in consultation with NSWRFs.	Compliant
Schedule 3 Condition 44	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.	Operational	At all times		Weighbridge records and Inspection Sheets		Specific Immobilisation Approval sought from NSW EPA 2005 (2005-S-13) for historical disposals. Protocol for sampling and assessment developed. Extensions to SIA sought as required, including provision of statistical data analysis demonstrating classification (per TCLP fluoride) and compliance with Approval. Beyond some baghouse dust residues, WA has essentially achieved a zero-waste status with respect to process residues. Baghouse dust residues have been classified as GSW, and are disposed of accordingly. Periodic sample analyses are performed to verify GSW classification.	Compliant
Schedule 3 Condition 45	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.	Operational	At all times	Period review of Consent and EPL provisions (particularly in response to Modifications and new Developments).	Weighbridge Records, Inspection Sheets, Operational Data Sheets		Wastes are received on site for reprocessing and resource recovery in accordance with regulatory approvals. No waste disposal occurs on site. Accepted wastes are in accordance with EPL provisions (Note: no asbestos waste received or accepted).	Compliant
Schedule 3 Condition 46	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.	All Development stages	At all times until a feasible recycling option is identified and implemented.		Annual Environmental Management Reports	CCC, EPA and DPHI	Progress with WA's investigation of recycling options historically reflected in former 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 dramatically reduced to <500 tonnes per annum, and have remained low (typically <200 tpa) ever since.	Compliant
Schedule 3 Condition 47	The Applicant shall maximise on site waste recycling, in particular packaging materials, paper and any other such wastes.	All Development stages	At all times		Weighbridge Records		WA introduced additional bins (Paper & Cardboard and Timber) in 2008 to improve recycling performance and reduce landfilling activity. WA has since moved to a more paper-free environment, and seeks low-packaging consumables purchases. Timber pallets are either reused on site for product dispatch, or otherwise dispatched to an offsite processor for chipping and resale as mulch. Since the introduction of Consumer Waste Shredding activities, the quantity of cardboard packaging has again increased (in preference to plastic shrink-wrap), so cardboard is now segregated, baled and dispatched via a 3rd-party contractor for offsite recycling, thereby avoiding landfill disposal.	Compliant
Schedule 3 Condition 48	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.	All Development stages	At all times				Any clearing performed beyond that defined in the CEMP has been performed in accordance with subsequent Modifications, and in consultation with NSWRFs / FRNSW as part on APZ establishment and maintenance, particularly after the significant local/regional bushfires in 2014 and 2016. FRNSW and NSWRFs are particularly concerned about regrowth fuel load (e.g. near carpark and pond), and insisted on more routine hazard reduction (slashing), which has occurred routinely since, and has continued through the Reporting Period.	Compliant
Schedule 3 Condition 49	Clearing for the development shall be restricted to areas of the site covered by the Angophora/Stringsbark/Grey Gum community. The Forest Red Gum, (Eucalyptus tereticornis) community shall be preserved for its habitat value and ecological significance.	All Development stages	At all times				Vegetation Management Plan (15 May 1997) and supplementary information provided by WA (02 Jun 1997) indicated the majority of Forest Red Gum community would be retained. NPWS satisfied with VPM (letter 05 Jun 1997). As above, any clearing performed beyond that defined in CEMP has been performed in accordance with subsequent Modifications, and in consultation with FRNSW and NSWRFs as part on APZ establishment and maintenance, particularly after the significant local/regional bushfires in 2014 and 2016. FRNSW and NSW RFS particularly concerned about regrowth fuel load (e.g. near carpark and pond), and insisted on more routine hazard reduction (slashing), which has occurred routinely since.	Compliant
Schedule 3 Condition 50	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.	All Development stages	At all times				Wetland construction and maintenance is performed in accordance with the E&S Plan. Silt fencing also established and maintained at the northern boundary at the steepest sloped location. NPWS in letter of 05 Jun 1997 confirmed entire Typha swamp would be retained. Pg 15 of Erosion, Sediment and Water Management Plan outlines erosion controls downstream of work areas prior to works commencement.	Compliant
Schedule 3 Condition 51	The Applicant shall implement a program to minimise the presence and spread of weeds, in particular camphor laurel, on the site.	All Development stages	At all times		MEX database		Preventative Maintenance performed - removal and/or spraying of weeds, including Camphor Laurel. Weed Management Plan (03 Mar 2015) implemented. No camphor Laurel present on site since mid-2015. Common weed spraying is performed as part of ongoing Preventative Maintenance program.	Compliant
Schedule 3 Condition 52	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.	All Development stages	At all times			EPA and Environment & Heritage	Nil artefacts identified to date. Should any artifacts be identified, NSW Environment & Heritage is to be notified immediately.	Compliant
Schedule 3 Condition 53	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.	Operational	Within 6 months from commencement of Mod 3	ESAP preparation. Performance of actions monitored via annual NGER (National Greenhouse and Energy Reporting) reports.	ESAP	DPHI	COMPLETED. Advitech engaged to prepare an ESAP. Final Report (28 June 2010) submitted to the Planning Secretary (NSW DoP) on 27 Jul 2010. WA has since implemented numerous measures, including: 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 lighting; 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 c.f. time-based operation). Energy Conservation Plan also prepared for the original development and provided to CCC on 12 Mar 1997.	Compliant

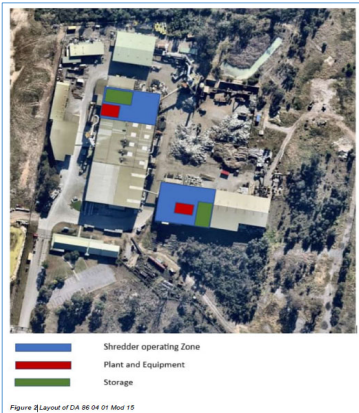
COMPLIANCE TABLE

ID NO.	COMPLIANCE REQUIREMENT (MOD 15)	DEVELOPMENT PHASE	LEAD TIME	MONITORING METHODOLOGY	EVIDENCE REQUIRED	RECEIVING AUTHORITY/DEPARTMENT	EVIDENCE AND COMMENTS	COMPLIANCE STATUS										
Schedule 3 Condition 54	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.	All Development stages	At all times beyond Mod 3	AEMR, NPI and NGER reporting	NPI and NGER reporting	CCC, EPA and DPHI	GHG emissions reported via NGER (EERS) Reporting. Historical data demonstrates general improvements or otherwise stability in energy efficiencies and reductions in facility GHG emissions. 	Compliant										
Schedule 3 Condition 54A	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; andundertake 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.	Operational	During Mod 8	Refer Monitoring and Verification Report	Monitoring and Verification Report	CCC, EPA and DPHI	COMPLETED. Monitoring and Verification Report for SPL Processing Trial (Mod 8) issued 20 May 2016, following Trial completion. All monitoring requirements satisfied. No exceedances of air emission criteria throughout Trial.	Compliant										
Schedule 3 Condition 54B	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; 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.	Operational	During Mod 8	Refer Monitoring and Verification Report	Monitoring and Verification Report	CCC, EPA and DPHI	COMPLETED. Monitoring and Verification Report for SPL Processing Trial (Mod 8) issued 20 May 2016, following Trial completion. All monitoring requirements satisfied. No exceedances of air emission criteria throughout Trial.	Compliant										
Schedule 3 Condition 54C	For the duration of 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 is 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 than 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; 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.	Operational	During Mod 9	Refer Monitoring and Verification Report	Monitoring and Verification Report	CCC, EPA and DPHI	COMPLETED. Monitoring and Verification Report for Pharmaceutical and Illicit Drug Processing Trial (Mod 9) issued 11 Nov 2017, following Trial completion. All monitoring requirements satisfied. No exceedances of air emission criteria throughout Trial.	Compliant										
Schedule 3 Condition 54D	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 the EPA, Council and the Planning Secretary within 90 days of the completion of DA 86-01-01 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 conditon 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.	Operational	During Mod 9	Refer Monitoring and Verification Report	Monitoring and Verification Report	CCC, EPA and DPHI	COMPLETED. Monitoring and Verification Report for Pharmaceutical and Illicit Drug Processing Trial (Mod 9) issued 11 Nov 2017, following Trial completion. All monitoring requirements satisfied. No exceedances of air emission criteria throughout Trial.	Compliant										
Schedule 3 Condition 54E	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.	Operational	During Mod 12	SOPs and training. Operational Data Sheets and SiteTracker	Operational Data Sheets		Approval granted by the EPA during the Reporting Period (Mar 2023) and operations performed in accordance with 54C. No liquid wastes co-processed with Dross during the Reporting period.	Compliant										
Schedule 3 Condition 54F	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.	Operational	During Mod 12 processing operations	Per SOP for Pharmaceutical and Illicit Drug Processing	Refer Rotary Furnace Operations Sheets, Illicit Drug Inspection Sheets and Citect data output files.		Process conditions recorded on Operation Sheets in accordance with Consent and EPL requirements.	Compliant										
Schedule 3 Condition 54G	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 prepared by AECOM and dated 10 July 2017 and included in Appendix B.	Operational	12 months after Mod 12 commencement				COMPLETED. Air Emissions Verification Report (AEVR) prepared and submitted to DPE and EPA 16 Dec 2020. Scope achieved. AEVR approved by DPE 10 Mar 2021.	Compliant										
Schedule 4 Condition 55	The Applicant shall implement the following Plans for the development: 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 <i>Hazardous Industry Planning Advisory Paper No. 7 - Construction Safety Study Guidelines</i> .	Initial facility construction	During construction phase	Per CEMP			COMPLETED. Requirements defined in the CEMP and CSS were satisfied.	Compliant										
Schedule 4 Condition 55A	The Applicant must prepare and implement a Construction Environmental Management Plan for the duration of the construction of DA 86-04-01 Mod 14. The plan must be prepared in accordance with the relevant guidelines, and include: (a) details of: (i) the relevant statutory requirements; (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any mitigation measures; (b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; (c) a program to monitor and report on the: (i) impacts and environmental performance of the development; and (ii) effectiveness of the management measures set out pursuant to paragraph (b) above; (d) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; (e) a protocol for managing and reporting any: (i) incident or non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); complaint; and (iii) failure to comply with statutory requirements.	Construction phase (Mod 14)	Prior to and during construction phase of Mod 14	CEMP preparation	CEMP is available to regulators upon request	Not required to be submitted. EPA notification of construction completion.	COMPLETED. CEMP prepared Feb22 and implemented during construction phase of Mod 14 (not required to be submitted for approval). Construction completed Aug22 (NSW EPA notified 02Aug22). <i>Note: wording of Condition 55A (inclusion of items (a) - (e)) appears to have been updated upon finalisation of Mod-15 consolidated Consent...</i>	Compliant										
Schedule 4 Condition 56	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 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 and Rescue 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.	Operational (Mod 3)	Within 3 months of commencement of Mod 3		Updated OEMP, FSS, ERP and SMS	DPHI	COMPLETED. Original plans prepared and approved (by then Planning NSW) in 2002. Updated documents: OEMP (AECOM; Dec 2009), FSS (AECOM, Dec 2009), ERP (WA, Nov 2009) and SMS (WA Nov 2009) issued to DPE (03 Dec 2009) and subsequently approved. These documents have also been updated as part of subsequent Mods (e.g. Mod 7, 12 and SSD 7396) and as part of routine review and updates.	Compliant										
Schedule 4 Condition 56A	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. <table data-bbox="219 1673 563 1757"><tr><th>Modification</th><th>Plans</th></tr><tr><td>DA 86-04-01 Mod 7</td><td>SS C, d and e</td></tr><tr><td>DA 86-04-01 Mod 9</td><td>SS G and e</td></tr><tr><td>DA 86-04-01 Mod 12</td><td>SS G and e</td></tr><tr><td>DA-86-04-01 Mod 15</td><td>SS C and B</td></tr></table>	Modification	Plans	DA 86-04-01 Mod 7	SS C, d and e	DA 86-04-01 Mod 9	SS G and e	DA 86-04-01 Mod 12	SS G and e	DA-86-04-01 Mod 15	SS C and B	Operational (Mod 15)	Within 3 months of commencement of Mod 15	Diary entry	Submission of updated Plans	DPHI	Updates of the Fire Safety Study and Emergency Plan not required for Mod 16. Current versions updated per earlier Mod 15.	Not triggered
Modification	Plans																	
DA 86-04-01 Mod 7	SS C, d and e																	
DA 86-04-01 Mod 9	SS G and e																	
DA 86-04-01 Mod 12	SS G and e																	
DA-86-04-01 Mod 15	SS C and B																	
Schedule 4 Condition 56B	The Applicant shall update the Safety Management System covering all on-site operations and secuity protocols for the storage, transport and incineration of pharmaceutical and illicit drug wastes.	Operational (Mod 9)	Prior to commencement of Mod 9	Diary entry	Submission of updated SMS	DPHI	COMPLETED. As above. Documents updated most recently for Mod 12: SMS (WA, Sep 2019; minor subsequent revisions Feb and May 2020) issued to DPE (03 Dec 2019). Also prepared in conjunction with corresponding Plan updates sought by SSD 7396. Safety Management System Manual approved by DPE 13 May 2020. Subsequent SMS and ERP revisions are performed on an annual basis.	Compliant										
Schedule 4 Condition 56C	Six months after commencement of operation of DA 10397 of 1995 Mod 10 [DA 86-04-01 Mod 12], the Applicant shall submit to the Planning Secretary, a report verifying that: a) the updated Emergency Response 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.	Operation (Mod 12)	6-months after Mod 12 commencement	Diary entry	Correspondence to DPE	DPHI	COMPLETED. ERP and SMS updated concurrently per Mod 12 and SSD 7396 requirements. ERP approved in Sep 2019, while SMS approved May 2020 following Department reviews and comment. Email of 06 Jul 2020 forwarded to DPE confirming that the ERP and SMS have been implemented and are currently in place.Subsequent SMS and ERP revisions are performed on an annual basis.	Compliant										
Schedule 4 Condition 57	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 our in Appendix C .	Operational	Immediately following incident, should a notifiable incident occur.	Routine Compliance monitoring and inspection	In-house documentation	DPHI and/or EPA, as applicable	Emergency Services support sought during the Reporting Period for a baghouse 1 fire (05Sep24). WA's PIRMP was implemented and relevant authorities (including NSW DPHI) notified accordingly. Report per Appendix C of Development Consent was submitted to DPHI on 20Sep24. DPHI acknowledged and satisfied with incident reporting.	Compliant										

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ID NO.	COMPLIANCE REQUIREMENT (MOD 15)	DEVELOPMENT PHASE	LEAD TIME	MONITORING METHODOLOGY	EVIDENCE REQUIRED	RECEIVING AUTHORITY/DEPARTMENT	EVIDENCE AND COMMENTS	COMPLIANCE STATUS
Schedule 4 Condition 58	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.	Operational	Within 7 days after becoming aware of a non-compliance, should a non-compliance occur.	Routine Compliance monitoring and inspection	Formal notification	DPHI and/or EPA, as applicable	Refer above	Compliant
Schedule 4 Condition 59	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.	Operational	Per Condition 58, in the event of a non-compliance.	Routine Compliance monitoring and inspection	Formal notification	DPHI and/or EPA, as applicable	Refer above	Compliant
Schedule 4 Condition 60	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Operational	n/a				Noted.	Compliant
Schedule 4 Condition 61	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.	Operational	Within three months after the first year of commencement of operation, and in the same month each subsequent year	Compliance Reporting	Compliance Report	DPHI	2024-25 Compliance Report prepared to capture development activities up-to and including Mod 16. This Compliance Table forms part of the 2024-25 Compliance Report.	Compliant
Schedule 4 Condition 63	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.	Operational	Publicly available within 60 days of DPE submission, and 7 days in writing to DPE prior		Website upload, following formal written notification to DPE	DPHI	2023-24 Compliance Report submitted to the MP Portal 08Nov24, and notified same-day that Report will be published on the website no sooner than 7 days from Notification. Similarly, the 2024-25 Compliance Report will be uploaded to the website within 60 days after Department submission, and the Department will be notified at least 7 days prior.	Compliant
Schedule 4 Condition 64	Within one year of 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).	Operational	Within one year of commencement of operation (by 03Aug23), and every three years after	Diary entry	Auditor engagement and DPE endorsement, Independent Audit Report	DPHI	RPS engaged for 2023 Independent Environmental Audit, and the proposed Audit Team endorsed by DPE (07Jun23). IEA Report submitted to MP Portal 24Nov23. DPHI acceptance 26Jun24. Next IEA due in 2026.	Compliant
Schedule 4 Condition 65	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 [64] 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 is done.	Operational	Per condition following receipt of the Audit Report	Diary entry	Independent Audit Report and Action Register	DPHI	The 2023 Audit is the first performed under the 2020 PARs. Action plans prepared following IEA Report finalisation, and submitted to the MP Portal 04Dec23. Subsequent updates (latest Nov24) submitted via the Portal. Updated Action Plan status forms part of the 2024-25 Compliance Report.	Compliant
Schedule 4 Condition 66	In accordance with specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must: a) review an 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.	Operational	Submit and respond to Audit Reports in a timely manner. Publically available within 60 days of DPE submission, and 7 days in writing to DPE prior	In-house reporting	Website upload, following formal written notification to DPE	DPHI	Condition now superceded by Schedule 4 Condition 65.	Compliant
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 the commencement of the audit. Hazard Audits must be carried out in accordance with the Department's <i>Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit Guidelines'</i> .	Operational (Mod 12 and beyond)	12 months following commencement of Modification 12 (i.e. By 06 Sep 2020) and every 3 years thereafter. Reports to be submitted to the Planning Secretary for approval within one month of completing each audit. Auditor(s) to be pre-approved by the Department	Execution of correspondence. Hazard Audit Reports to be prepared in accordance with the Department's HIPAP No. 5 requirements	Auditor endorsement by the Planning Secretary. Hazard Audit Reports.	DPHI	Advitech engaged for 2023 Independent Hazard Audit, and the proposed Audit Team endorsed by DPE (20Jun23). Audit commenced with the provision of documentary evidence, and site-based Audit activities occurred 24 and 25Aug23. Delays experienced with Audit reporting communicated with DPE, and an alternate reporting deadline of 23Oct23 approved by DPE (06Oct23). 2023 IHA submitted to the MP Portal 23Oct23, along with associated Action Plan. All actions completed by 21Dec23. 2023 IHA approved by (the then) DPE 19Dec23. Noted that the Consent Condition wording should now make reference to Mod 14 (rather than Mod 12). Next Independent Hazared Audit due 2026.	Compliant
Schedule 4 Condition 68	Within one month of each audit carried out in accordance with Condition 54 (typo), 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, resopns must be documented. The Applicant must implement the recommendations to the satisfaction of the Planning Secretary.	Operational	Within 1 month of Independent Audit Report submission.	Translation of Audit Recommendations into report with appropriate timeframes for implementation.	Report - Actions, Timeframes, Status	DPHI	Refer above	Compliant
Schedule 4 Condition 69	Any condition of this consent that requires the carrying out of 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. Note: For the purposes of this condition, as set out in the EP&A ct, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.	Pre-Operational and Operational					Noted	Compliant
Schedule 4 Condition 70	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: the documents referred to in condition Error! Reference source not found. of Schedule 2 of this consent; ii. all current statutory approvals for the development; iii. all approved strategies, plans and programs approved 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; 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.	Operational	As applicable (refer above)	Refer above	Refer above	DPHI and/or EPA, as applicable	Required information and documents are available on the company website and updated on an as-required basis.	Compliant
Appendix A Site Plan	 Figure 1: Site layout plan							

COMPLIANCE TABLE

ID NO.	COMPLIANCE REQUIREMENT (MOD 15)	DEVELOPMENT PHASE	LEAD TIME	MONITORING METHODOLOGY	EVIDENCE REQUIRED	RECEIVING AUTHORITY/DEPARTMENT	EVIDENCE AND COMMENTS	COMPLIANCE STATUS																		
Appendix A Site Plan																										
Appendix B Hazard and Risk Mitigation Measures	Table 15 Summary of Management Measures <table><tr><th>Issue</th><th>Mitigation Measures</th></tr><tr><td>Air Quality</td><td> - All existing air quality monitoring and management systems will continue to be operated for the duration of the Project; and - Monitoring of air emission parameters currently assessed for processing operations will continue to be undertaken in accordance with the existing emissions monitoring regimes. </td></tr><tr><td>Hazards and Risk</td><td> WA commits to the ongoing operation of existing and proposed site safeguards identified for the facility for the duration of operation of the Project: - Bag-houses – all bag-houses will be fitted with real-time, continuous particulate monitoring systems (existing); - Bag-houses – all bag-houses will be fitted with high differential pressure detection to activate bag pulsing and cleaning processes (existing); - Baghouse No.1 – Exhaust gases from the furnaces will be directed to Baghouse No.1 for treatment prior to release to atmosphere (existing); - The existing site Environmental Management System will be updated to incorporate the increased capacity with regards to pharmaceutical and illicit drug wastes. Change management procedures have been completed for the introduction of the processing trial, and prior to full scale commercial treatment the following documents will be updated: - Safety Management System; and - Environmental mitigation measures. - The Safety Management System Manual will be updated to include the operations and materials associated with the Project prior to the commencement of operation in accordance with the requirements of the <i>NSW Work Health and Safety Regulation 2011</i>; - The Emergency Response Plan will be updated to include specific responses to the hazard scenarios identified for this Project; - WA will continue to comply with the conditions of the EPL issued by the EPA under the POEO Act; - WA will update the SafeWork NSW Notification of Dangerous Goods for manifest quantities where the storage of DG materials is anticipated; - The transport of dangerous goods to and from site will be in accordance with the Australian Dangerous Goods Code of Practice / NZ 5433; and - As a part of the update to the safety management system manual, WA's dangerous goods policy, plans and procedures will be updated to include the requirement to store and handle all dangerous goods in accordance with the relevant Australian Standard for each class including: - AS 1940 – The Storage and Handling of Flammable and Combustible Liquids; - AS 4332 The storage and handling of gases in cylinders; - AS/NZS 4452, The storage and handling of toxic subetances; - AS/NZS 3816, Management of clinical and related wastes; - HB 202, A management system for clinical and related wastes – Guide to the application of AS/NZS 3816, Management of clinical and related wastes; - AS 3780 – The storage and handling of corrosive substances; - AS/NZS 4681 – The storage and handling of Class 9 miscellaneous dangerous goods; and - AS/NZS 3833 – The Storage and Handling of Mixed Classes of Goods, in Packages and Intermediate Bulk Containers. </td></tr><tr><td></td><td> The following additional safeguards have been identified in protecting against the accumulation of flammable gases within the furnace in the event of a flameout: - During normal operation, the temperature of the furnaces would operate in the order of 900-1000°C; - In the event of burner failure, the furnace automatically undergoes a purge cycle as part of reset conditions (as per Australian Standard requirements), eliminating the potential for the accumulation of flammable gases; and - The operating temperatures would be well above the auto-ignition temperature of methane and also that of any hydrocarbon solvents that could be introduced in the waste stream that might be a potential source of flammable gases. 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Spilt material will be returned to storage for processing (i.e. not disposed of); and - The water quality monitoring program will continue to be implemented. </td></tr><tr><td>Greenhouse Gas</td><td> - Practices currently in place at the plant to reduce GHG emissions, including the routine tuning and maintenance of furnace burners, will continue to be undertaken. </td></tr><tr><td>Noise</td><td> - Truck movements will continue to be restricted to between the hours of 7am and 10am in accordance with Condition L5.1 of the EPL. </td></tr><tr><td>Waste</td><td> - Transport of pharmaceutical waste will be undertaken by licensed waste </td></tr></table>	Issue	Mitigation Measures	Air Quality	- All existing air quality monitoring and management systems will continue to be operated for the duration of the Project; and - Monitoring of air emission parameters currently assessed for processing operations will continue to be undertaken in accordance with the existing emissions monitoring regimes.	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Waste	Transport of pharmaceutical waste will be undertaken by licensed waste						Hazard and Risk Mitigation Measures implemented and ongoing for all operations during the Compliance Reporting Period (since commencement of Mod 12). Management Plans and Systems updated accordingly to reflect MOD 12 requirements. Also refer commentary above.	Compliant
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ID NO.	COMPLIANCE REQUIREMENT (MOD 15)			DEVELOPMENT PHASE	LEAD TIME	MONITORING METHODOLOGY	EVIDENCE REQUIRED	RECEIVING AUTHORITY/DEPARTMENT	EVIDENCE AND COMMENTS	COMPLIANCE STATUS
	Management	transport operators and the waste will be formally tracked in accordance with the NSW EPA's Online Waste Tracking protocol; • Transport of illicit drug wastes will be facilitated by NSW Police and relevant Chain of Custody procedures will apply; • WA standard operating procedures for material receipt and delivery record keeping will continue to apply for pharmaceutical and illicit drug wastes; • Prior to storage and/or processing, wastes will be inspected and details recorded on the relevant inspection sheet, including the date and time, the nature of the consignment, packaging type, mass / volume and the source; • Bulk bag wastes will be disposed of to an appropriately licensed facility in conjunction with routine site disposal protocols, and • No landfilling of the ash residues will occur.								
	Social and Economic	• The site will be secure at all times and security will be maintained in accordance with defined protocols; • NSW Police will be responsible for the secure transport of illicit drug wastes								
		to the facility, and will supervise the handling and complete destruction of these wastes immediately upon receipt. There will be no storage of illicit drugs on site. These processes will be thoroughly controlled and documented by NSW Police; and • In the event that pharmaceutical wastes requiring disposal do contain small quantities of precursors, WA will require formal prior notification from waste suppliers and will insist that such materials be segregated for either immediate processing upon receipt or secure onsite storage. Storage and processing of such wastes will be under the direct supervision of WA management and waste generator / agent representatives, as required.								
Appendix C Incident Notification and Reporting Requirements	WRITTEN INCIDENT NOTIFICATION REQUIREMENTS 1. A written incident notification addressing the requirements set out below must be emailed to the Department at the following address: compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition 8 or, having given such notification, subsequently forms the view that an incident has not occurred. 2. Written notification of an incident must: a. identify the development and application number; b. provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); c. identify how the incident was detected; d. identify when the applicant became aware of the incident; e. identify any actual or potential non-compliance with conditions of consent; f. describe what immediate steps were taken in relation to the incident; g. identify further action(s) that will be taken in relation to the incident; and h. identify a point contact for further communication regarding the incident. INCIDENT REPORT REQUIREMENTS 3. Within 20 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested. 4. The Incident Report must include: a. summary of the incident; b. outcomes of an incident investigation, including identification of the cause of the incident; c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and d. details of any communication with other stakeholders regarding the incident									

 Weston Aluminium Pty Ltd	DA 86-04-01 Mod 16 and LEC 10397 of 1995 Mod 15 2024-25 COMPLIANCE REPORT OPERATIONAL	Revision	1
		Page No:	28 of 30
		Prepared By:	C. McClung
		Authorised By:	G. Snedden
		Issue Date:	Oct 2025

APPENDIX B

Annual Air Emissions Monitoring Summary

2025 EPL Reporting Year

07-Oct-2025
Weston Aluminium
Doc No. 60539866_2025AESR

Annual Air Emissions Monitoring Summary

2025 EPL Reporting Year

Client: Weston Aluminium Pty Ltd

ABN: 91 075 245 108

Prepared by

AECOM Australia Pty Ltd

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07-Oct-2025

Job No.: 60539866

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Quality information

Document Annual Air Emissions Monitoring Summary
Ref 60539866
Date 07-Oct-2025
Originator Zac Heironymus
Checker/s Dylan Turnbull
Verifier/s Chad Whitburn

Revision History

Rev	Revision Date	Details	Approved	
			Name/Position	Signature
A	23-Sep-2025	Draft for client comment	Chad Whitburn Technical Director	
0	07-Oct-2025	Final for issue	Chad Whitburn Technical Director	

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1.0 Introduction

AECOM Australia Pty Ltd (AECOM) was engaged by Weston Aluminium Pty Ltd (Weston Aluminium) to summarise the results of air emission monitoring conducted at the Weston Aluminium facility at 129 Mitchell Avenue, Kurri Kurri, New South Wales (the site) for operations approved under Development Consents DA 86-04-01 (as Modified) and LEC 10397 of 1995 (as modified). The site is licensed under Environment Protection Licence (EPL) 6423 (anniversary date 19 December).

Air emission monitoring was undertaken to fulfill the requirements EPL 6423 for the 2024-2025 reporting period. This report summarises results of monitoring carried out by Port Hunter Environmental (PHE) during bi-annual compliance testing (4 October 2024) and annual compliance testing (26 to 29 May 2025).

To evaluate compliance with EPL 6423, monitoring results have been assessed against EPL limits relating to air emissions (refer Section 3.0). To provide additional context, monitoring results have been compared against historical site measurement trends (refer Section 4.0) and stack pollutant concentration predictions used in air quality impact assessments (AQIAs) previously undertaken for the site (refer Section 5.0).

2.0 Air emission monitoring points

EPL 6423 includes eight air monitoring points, which are detailed in Table 1 and shown in Figure 1. It is noted that EPL Point 2 (Stack 2) and EPL Point 3 (Stack 3) were destroyed in a fire in 2021 and were subsequently decommissioned and removed from the site. In addition, facility operations associated with EPL Point 17 (Stack 5) relate to an independent Development Consent, and accordingly Stack 5 air emissions results are to be reported separately. As a result, Stack 2, Stack 3 and Stack 5 have not been considered further in this summary.

Table 1 EPL 6423 air monitoring locations

EPL ID no.	Stack no.	Description	2024-2025 monitoring
1	Stack 1	Wet-Dry Lime-Fed Scrubber and Fabric Filter Baghouse No. 1 (servicing the No. 2 Rotary Furnace).	Annual compliance monitoring conducted 26 May 2025.
2	Stack 2	Fabric Filter Baghouse No. 2 (servicing the Dross Storage Bays).	N/A ¹
3	Stack 3	Fabric Filter Baghouse No. 3 (servicing the Metal Reclaiming Machine, Cooler and Screens).	N/A ¹
4	Stack 4	Fabric Filter Baghouse No. 4 (servicing the Metal Reclaiming Machine, Cooler and Screens).	Annual compliance monitoring conducted 29 May 2025.
13	Stack 1	Wet-Dry Lime-Fed Scrubber and Fabric Filter Baghouse No. 1 (servicing the Charging/Side Well of the Reverberatory Furnace).	• Bi-annual compliance monitoring conducted 3 October 2024 • Annual compliance monitoring conducted 27 May 2025
14	Stack 6	Direct vent of clean combustion gases (servicing the Holding Side of the Reverberatory Furnace).	Monitoring conducted 28 May 2025.
16	Stack 8	By-pass Stack (servicing the Thermal Waste Treatment Plant).	N/A ²
17	Stack 5	Dry Lime and Activated Carbon Fed Scrubber and Fabric Filter Baghouse No. 5 (servicing the Thermal Waste Treatment Plant).	N/A ³
18	Stack 7	Fabric Filter Baghouse No. 7 (servicing the Pre-Processing Plant, Dross Storage Bays (Aldex Building)).	Annual compliance monitoring conducted 29 May 2025.
¹ EPL Point 2 (Stack 2) and EPL Point 3 (Stack 3) were destroyed in a fire in 2021 and were subsequently decommissioned and removed from the site. ² No monitoring required for EPL Point 16 (Stack 8) under EPL 6423. ³ EPL Point 17 (Stack 5) operations relate to a separate Development Consent. Emissions data are to be reported separately.			

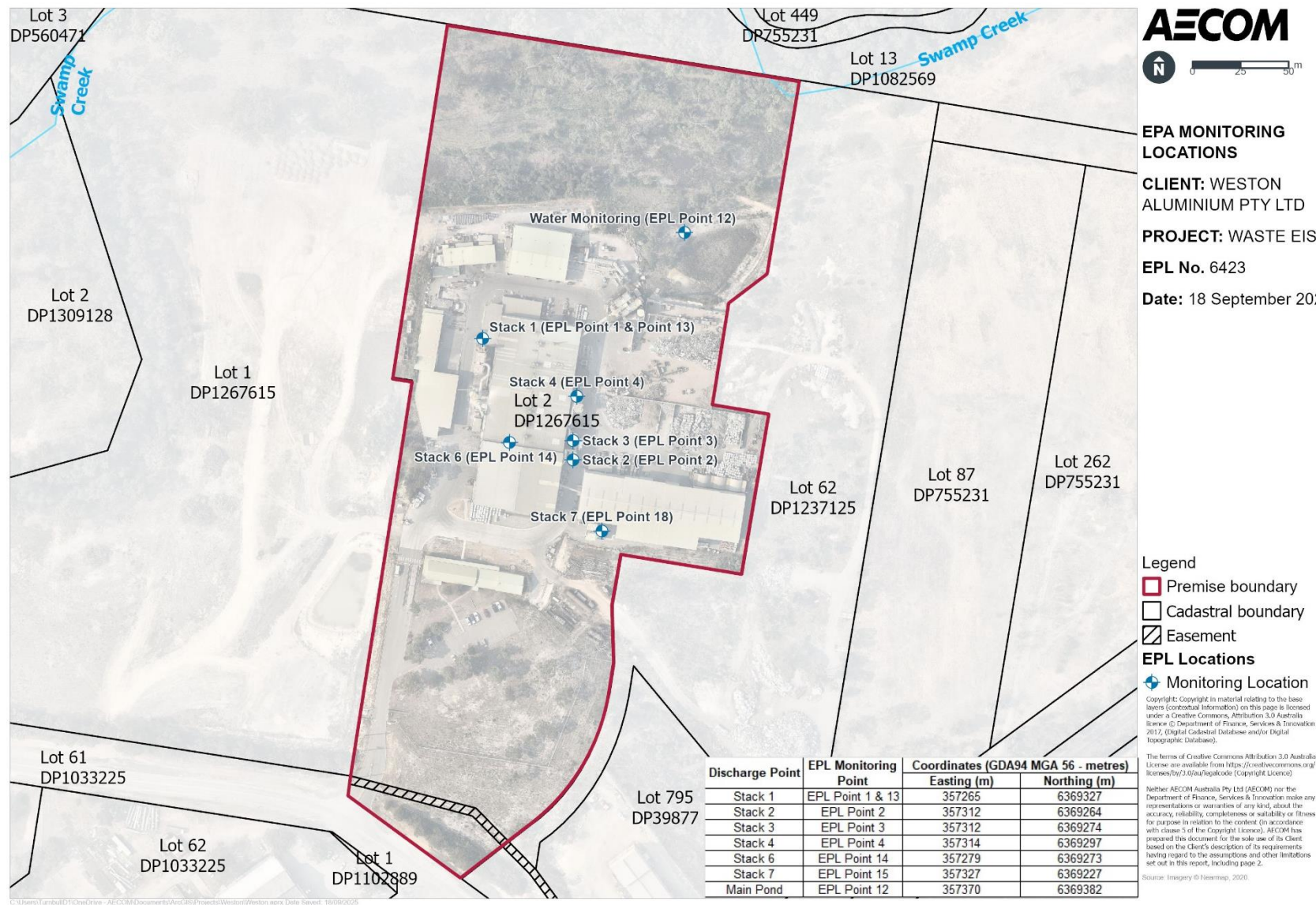


Figure 1 EPL 6423 air monitoring locations

3.0 Monitoring results summary

This section provides a summary of results of the air emission monitoring undertaken by PHE during the 2024-2025 reporting period. Monitoring was undertaken for the following air monitoring points:

- Point 1 (Stack 1 Rotary Furnace)
- Point 4 (Stack 4)
- Point 13 (Stack 1 Reverberatory Furnace)
- Point 14 (Stack 6)
- Point 18 (Stack 7).

Results of the air emission monitoring are summarised in Table 2 to Table 6. For all monitoring points tested, the measured stack concentrations of all pollutants are below the concentration limits specified in EPL 6423.

Table 2 Monitoring results summary - EPL Point 1 (Stack 1 Rotary Furnace)

Pollutant	Units	Test result ¹	EPL 6423 limit
Exit velocity	m/s	18	15 (minimum)
Gaseous fluoride	mg/m ³	<0.019	2
Type 1 and Type 2 substances in aggregate	mg/m ³	0.0092	1
Cyanide	mg/m ³	<0.011	0.8
Dioxins and furans (middle bound)	ng/m ³	0.0012	0.1
Carbon monoxide	mg/m ³	2	125
Sulfuric acid mist and sulfur trioxide (as SO ₃)	mg/m ³	<2.1	20
Solid particles	mg/m ³	0.81	15
Hydrogen chloride	mg/m ³	<0.52	10
Nitrogen oxides (as equivalent NO ₂)	mg/m ³	2	100
Cadmium	mg/m ³	0.000084	0.02
Gaseous fluoride	mg/m ³	<0.019	2
Sulfur dioxide (as SO ₃)	mg/m ³	<11	-
¹ Monitoring conducted on 26 May 2025.			

Table 3 Monitoring results summary - EPL Point 4 (Stack 4)

Pollutant	Units	Test result ¹	EPL 6423 limit
Solid particles	mg/m ³	0.47	24
¹ Monitoring conducted on 29 May 2025.			

Table 4 Monitoring results summary - EPL Point 13 (Stack 1 Reverberatory Furnace)

Pollutant	Units	Test result ¹	EPL 6423 limit
Type 1 and Type 2 substances in aggregate	mg/m ³	0.0055	1
Dioxins and furans (middle bound)	ng/m ³	0.0016 ²	0.1
		0.0011	
Carbon monoxide	mg/m ³	7	125
Sulfuric acid mist and sulfur trioxide (as SO ₃)	mg/m ³	<2.1	30
Solid particles	mg/m ³	0.24	10
Hydrogen chloride	mg/m ³	<0.53	10
Nitrogen oxides (as equivalent NO ₂)	mg/m ³	<2	100
Cadmium	mg/m ³	<0.00025	0.02
VOCs	mg/m ³	1.32	77
Sulfur dioxide (as SO ₃)	mg/m ³	<11	-
¹ Monitoring conducted on 27 May 2025 unless otherwise stated.			
² Monitoring conducted on 4 October 2024.			

Table 5 Monitoring results summary - EPL Point 14 (Stack 6)

Pollutant	Units	Test result ¹	EPL 6423 limit
Solid particles (corrected to 15% O ₂)	mg/m ³	7.4	10
¹ Monitoring conducted on 28 May 2025.			

Table 6 Monitoring results summary - EPL Point 18 (Stack 7)

Pollutant	Units	Test result ¹	EPL 6423 limit
Solid particles	mg/m ³	0.2	15
¹ Monitoring conducted on 29 May 2025.			

4.0 Comparison of results with historical trends

This section presents an analysis of the monitoring results presented in Section 3.0 against historical measured stack pollutant concentration trends. Comparison against historical trends is useful for identifying significant changes in process operating conditions and sampling errors.

Figures displaying air emission monitoring results for 2024-2025 compared to results for previous year (dating back to 2013) are presented in Appendix A. It is noted that the average of the two dioxins and furans measurements undertaken at EPL Point 13 during 2024-2025 was used for this comparison.

Comparison of 2024-2025 monitoring results against historical measurements shows:

- Gaseous fluoride concentrations measured at EPL Point 1 were consistent with historical levels.
- Type 1 and type 2 substances in aggregate concentrations measured at EPL Points 1 and 13 were consistent with historical levels.
- The cyanide concentration measured at EPL Point 1 was consistent with historical levels.
- Dioxins and furans concentrations measured at EPL Point 1 and 13 were consistent with historical levels.
- Carbon monoxide concentrations measured at EPL Point 1 and 13 were consistent with historical levels.
- Sulfuric acid mist and sulfur trioxide measurements at EPL Points 1 and 13 were consistent with historical levels.
- Measured solid particle concentrations were typically lower than or consistent with historical levels across the EPL release points, with the exception of EPL Point 14 which recorded the highest measured concentration across all available measurement records, yet was still less than the criteria.
- Hydrogen chloride concentrations measured at EPL Points 1 and 13 were consistent with historical levels.
- Nitrogen oxides concentrations measured at EPL Points 1 and 13 were consistent with historical levels.
- Cadmium concentrations measured at EPL Points 1 and 13 were consistent with or lower than historical levels.
- VOC concentrations measured at EPL Point 1 and 13 were consistent with historical levels.

5.0 Comparison of modelled and measured stack pollutant concentrations

This section provides a comparison of pollutant concentrations measured in the 2024-2025 reporting period against pollutant concentrations forecasted in AQIAs previously undertaken for the site.

As the stack pollutant concentrations used to inform stack emissions rates in AQIAs were used to demonstrate compliance with ground level air quality criteria, it is useful to compare recently measured stack pollutant concentrations against these values. If measured stack pollutant concentrations are below, or similar to modelled pollutant concentrations, then this provides an indication that the site is unlikely to be generating ground level pollutant concentrations greater than those predicted by the respective AQIA.

Air quality impacts for the site have been assessed in seven major impact assessment studies undertaken in 1994 (EIS), 2001 (EIS), 2007 (SEE), 2010 (EA), 2012 (EA), 2017 (EA), and 2021 (Modification 14 application).

The most recent, an AQIA prepared for the Modification 14 application prepared in 2021 included modelling based on the maximum stack concentration for each EPL point as measured from 2016 to 2019 and is considered the most relevant to the facilities current operations and is therefore the most appropriate for comparison against 2024-2025 monitoring data.

Stack pollutant concentrations used to inform the AQIAs undertaken for the site in 2001, 2007 (SEE), 2010 (EA), 2017 (EA), and 2021 have been compared against measured emissions for the reporting period in Table 7 to Table 9. Pollutant emission rates referenced in the 2010 EA for the briquetting facility are provided in Table 10. The comparisons show that for the 2024-2025 reporting period:

- The arsenic result for EPL Point 13 was marginally above the 2001 EIS prediction (0.00033 vs 0.0002 mg/m³).
- All other air emission monitoring results were below the concentrations used in site AQIA studies or had a result less than the limit of detection.

Table 7 Comparison of modelled and measured stack pollutant concentrations – EPL Point 1 (Stack 1)

Parameter	Unit	2007 SEE ¹	2017 EA ²	2021 AQIA ³	2025 result
SO ₂ ⁴	mg/m ³	2.1	5.5	6.0	<11
Nitrogen oxides	mg/m ³	4.6	11.3	9.0	2
PM ₁₀ ⁴	mg/m ³	6.4	0.55	3.1	0.5
Carbon monoxide	mg/m ³	10.8	118	25.2	2

¹ Calculated from stack gas flow rate at normal conditions and modelled stack emission rate in the 2007 SEE.

² Calculated from stack gas flow rate at normal conditions and modelled stack emission rate in the 2017 EA.

³ Maximum measured values as used for air dispersion modelling in the preparation of the 2021 Modification 14 AQIA.

⁴ Note that for sulfur dioxide and fine particulates (PM₁₀), a concentration limit is not specified in the EPL or Development Consent; these emissions are monitored for load based licensing and national pollutant inventory calculations.

Table 8 Comparison of modelled and measured stack pollutant concentrations - EPL Point 13 (Stack 1)

Parameter	Unit	2001 EIS	2007 SEE ¹	2017 EA ²	2021 AQIA ³	2025 result
SO ₂	mg/m ³	-	1.07	7.33	5.5	<11
Nitrogen oxides	mg/m ³	-	12.3	25.39	9.0	<2
Carbon monoxide	mg/m ³	-	38	-	-	7
PM ₁₀	mg/m ³	2.74	3.6	1.08	3.5	0.2
Hydrogen chloride	mg/m ³	7.27	-	1.85	-	<0.53
2,3,7,8-TCDD	ng/m ³	0.1303	-	-	-	<0.00059
Arsenic	mg/m ³	0.0002	-	-	0.000148	0.00033
Antimony	mg/m ³	0.0002	-	-	0.00013	<0.0025
Beryllium	mg/m ³	0.0010	-	-	0.00009	<0.0025
Cadmium	mg/m ³	0.0134	-	-	0.0188	<0.00025
Lead	mg/m ³	0.0318	-	-	0.00088	0.00067
Mercury	mg/m ³	0.0004	-	-	0.00131	<0.00033

¹ Calculated from stack gas flow rate at normal conditions and stack emission rate predictions in the 2007 SEE.

² Calculated from stack gas flow rate at normal conditions and stack emission rate predictions in the 2017 EA.

³ Maximum measured values as used for air dispersion modelling in the preparation of the 2021 Modification 14 AQIA.

⁴ Note that for sulfur dioxide, nitrogen oxides, carbon monoxide, fine particulates (PM₁₀) and hydrogen chloride, a concentration limit is not specified in the EPL. These emissions are monitored for load based licensing and national pollutant inventory calculations.

Table 9 Comparison of modelled and measured stack pollutant concentrations - EPL Point 14 (Stack 6)

Parameter	Unit	2007 SEE ¹	2021 AQIA ²	2025 result
SO ₂ ³	mg/m ³	1.0	10	<11
Nitrogen oxides	mg/m ³	316	81	39
PM ₁₀ ³	mg/m ³	13.8	1.7	0.71
Carbon monoxide	mg/m ³	44	3.0	2.0

¹ Calculated from stack gas flow rate at normal conditions and stack emission rate predictions in the 2007 SEE.

² Values used for air dispersion modelling undertaken in support of the 2021 Modification 14 AQIA.

³ Note that for sulfur dioxide and fine particulates (PM₁₀), a concentration limit is not specified in the EPL or Development Consent. These emissions are monitored for load based licensing and national pollutant inventory calculations. Furthermore, stack testing results are corrected to 15% oxygen and are more conservative than the stack concentrations used in the 2007 SEE.

Table 10 Comparison of modelled and measured stack pollutant concentrations - EPL Point 18 (Stack 7)

Parameter	Unit	2010 EA ¹	2025 result
Total particulates	mg/m ³	2.14	0.2

¹ Calculated from the emission factor for pulverised charcoal briquetting, which represents a conservative estimate.

6.0 References

AECOM Australia, 2016, *Thermal Waste Processing Project: Environmental Impact Statement*, 16 August 2016.

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HLA-Envirosciences, 2007, *Statement of Environmental Effects to Support Modification Applications for Aluminium Dross Recycling Facility*, 21 November 2007.

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Todoroski Air Sciences, 2021, *Air Quality Impact Assessment Weston Aluminium Modification*, 19 February 2021

URS, 2001, *Environmental Impact Statement for Additions to the Kurri Kurri Aluminium Refining and Recycling Facility*, 23 April 2001.

Appendix A

Historical monitoring
trends

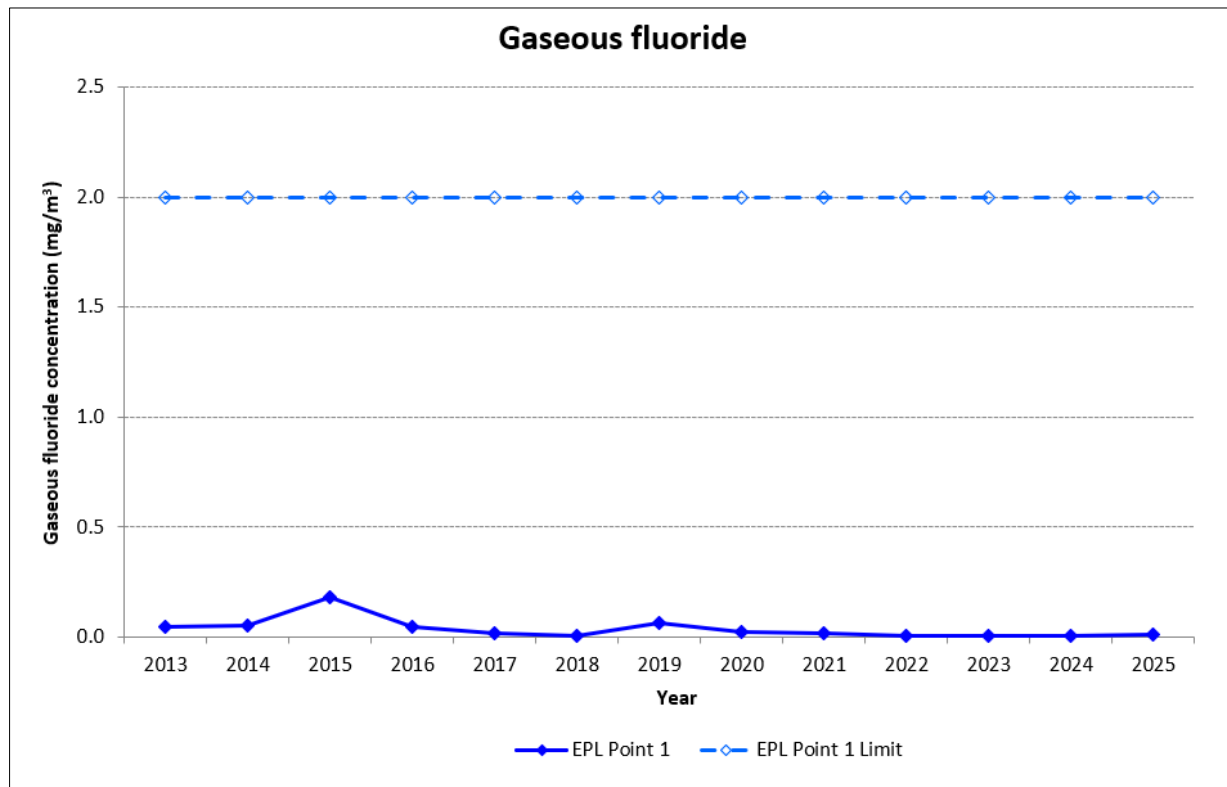


Figure A-1 Gaseous fluoride concentration - historical monitoring results

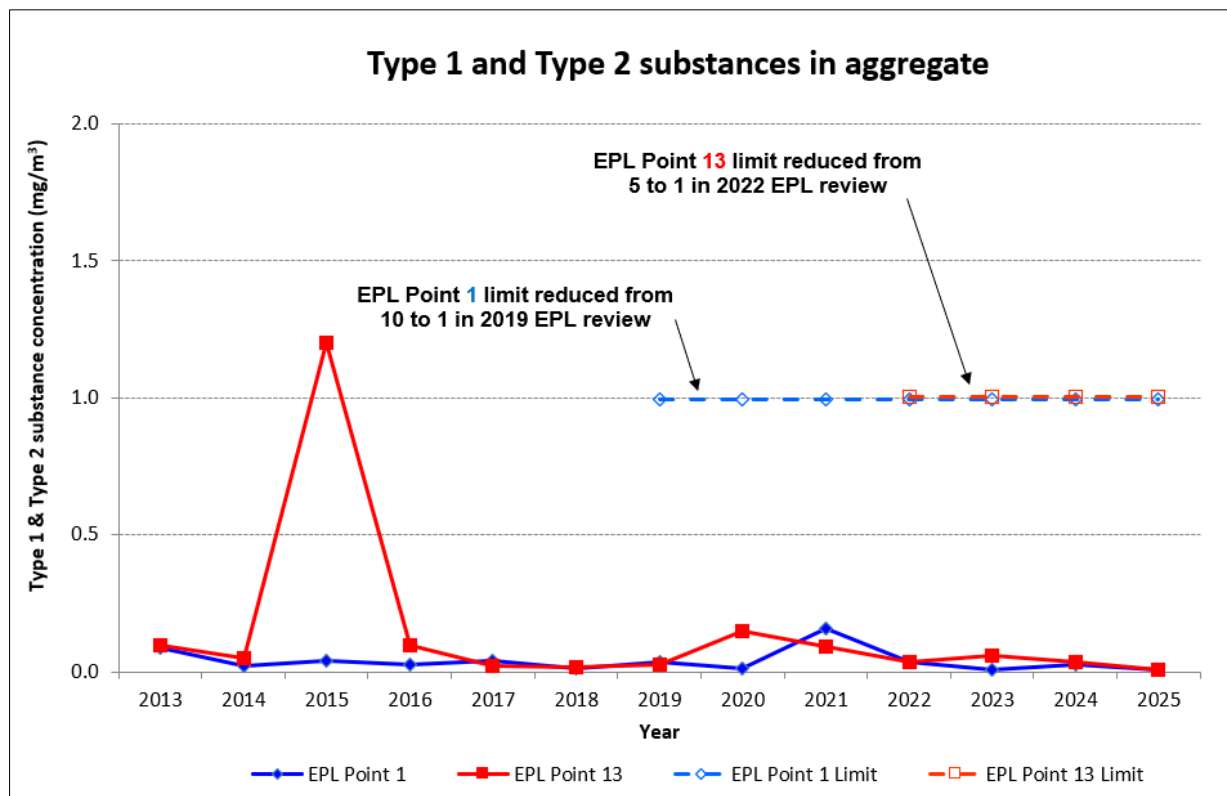


Figure A-2 Type 1 and 2 substances concentration - historical monitoring results

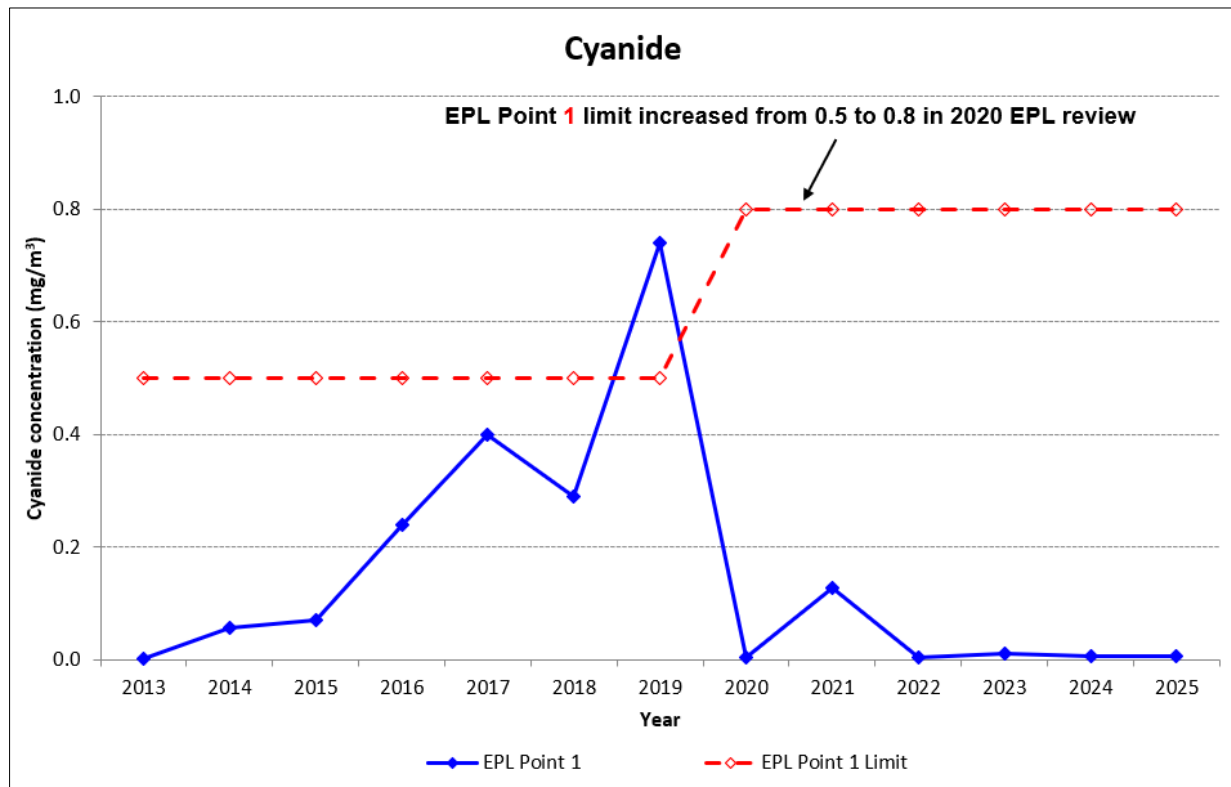


Figure A-3 Cyanide concentration - historical monitoring results

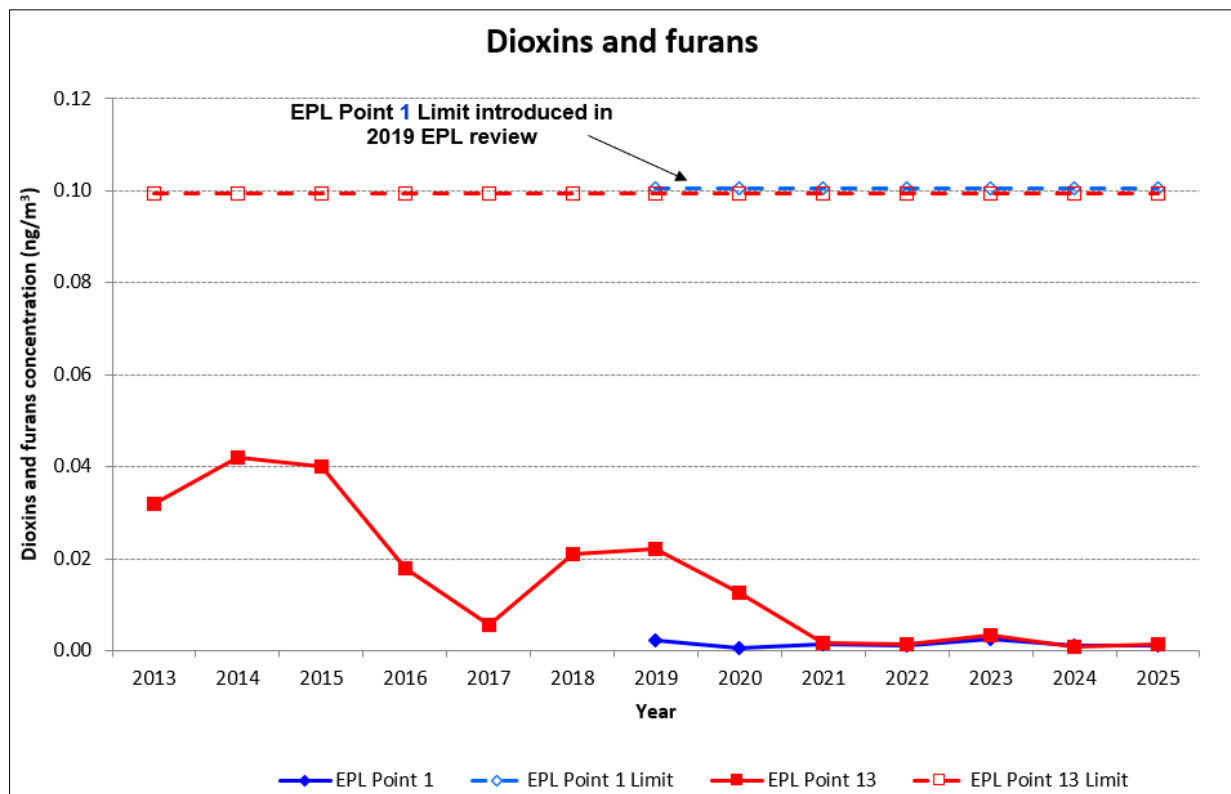


Figure A-4 Dioxins and furans concentration - historical monitoring results

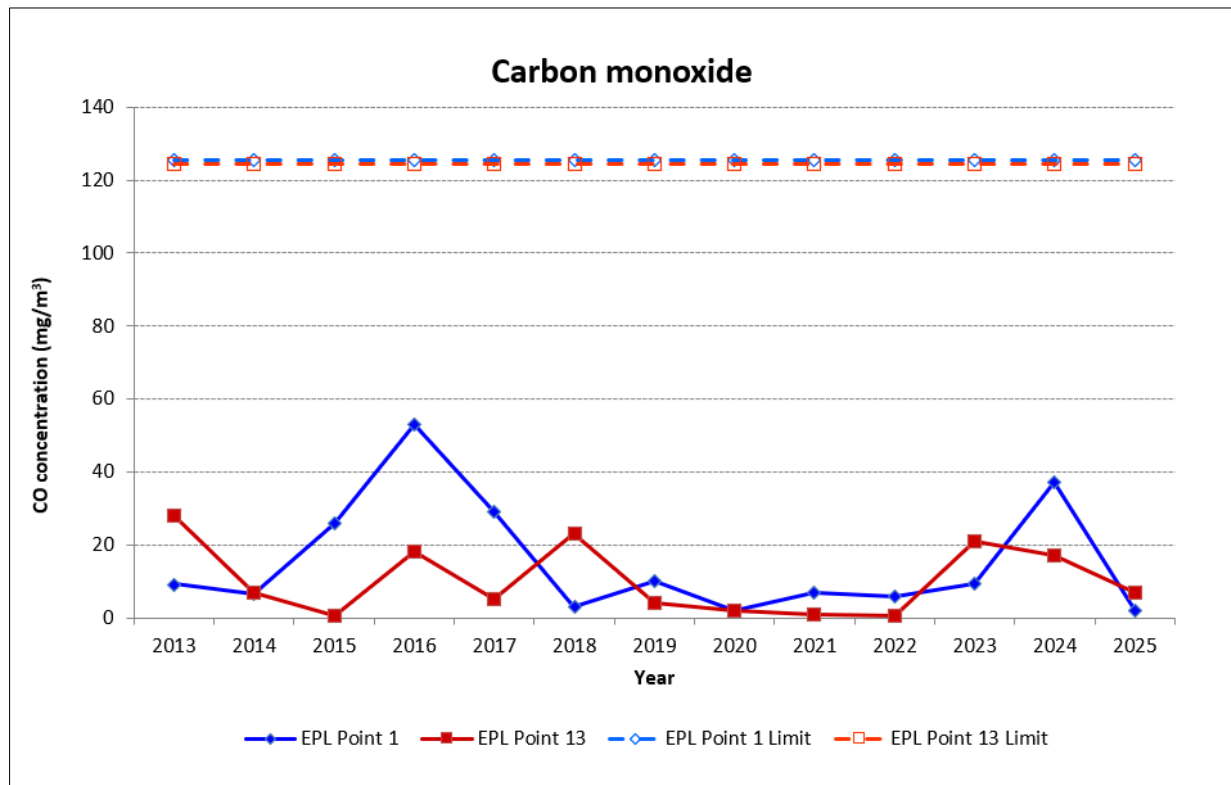
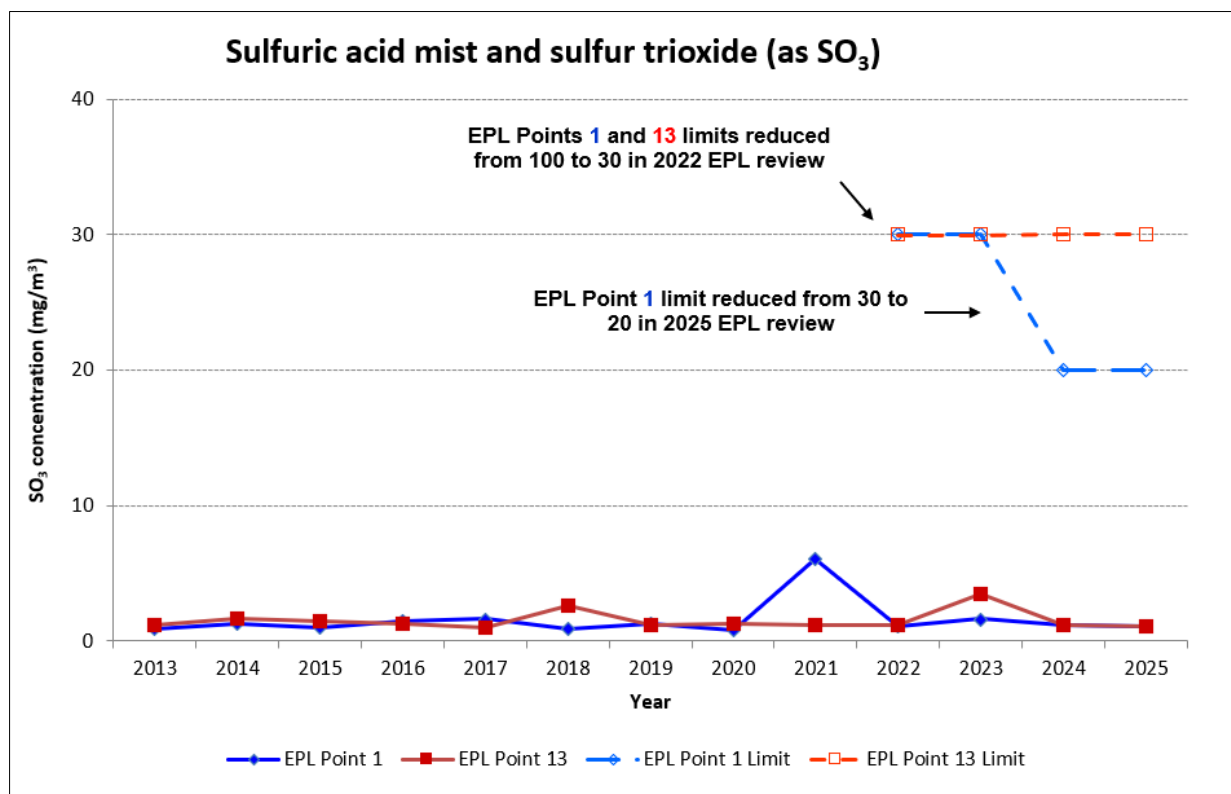


Figure A-5 Carbon monoxide concentration - historical monitoring results

Figure A-6 Sulfuric acid mist and sulfur trioxide (as SO₃) concentration - historical monitoring results

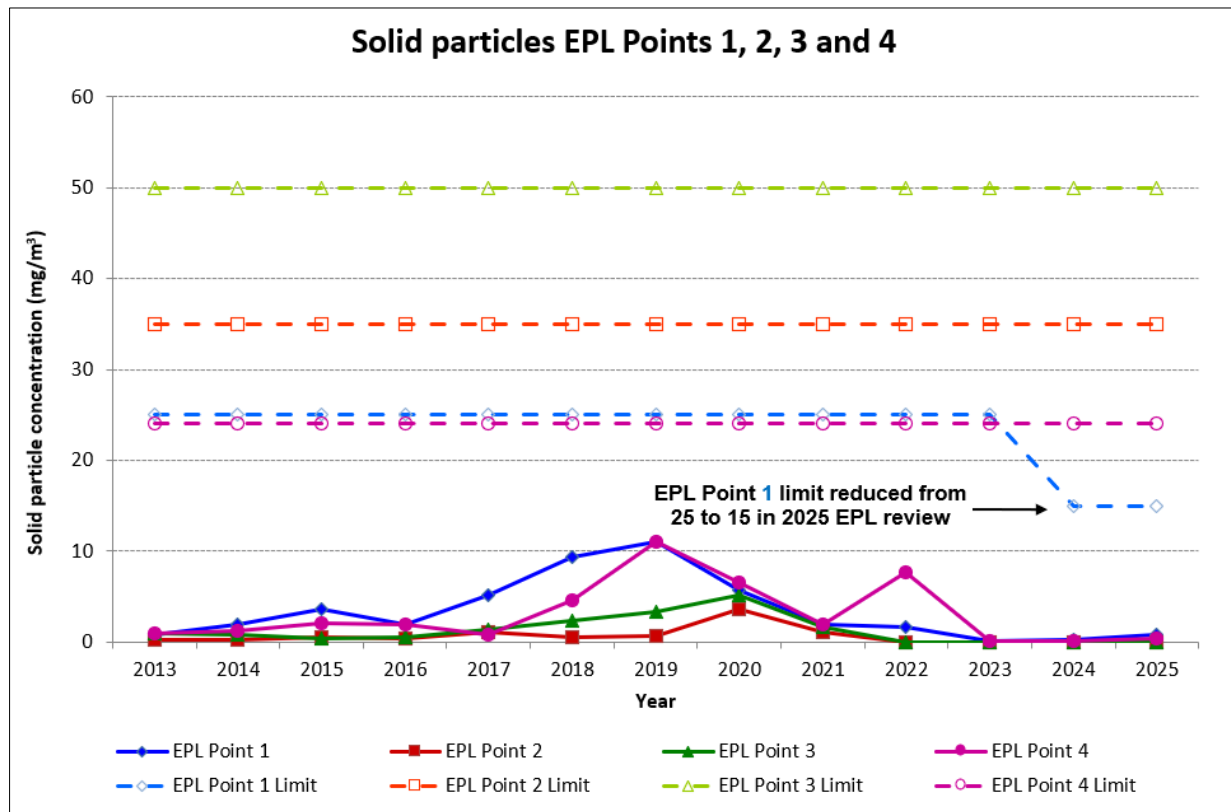


Figure A-7 Solid particles concentration - historical monitoring results for EPL Points 1, 2, 3 and 4

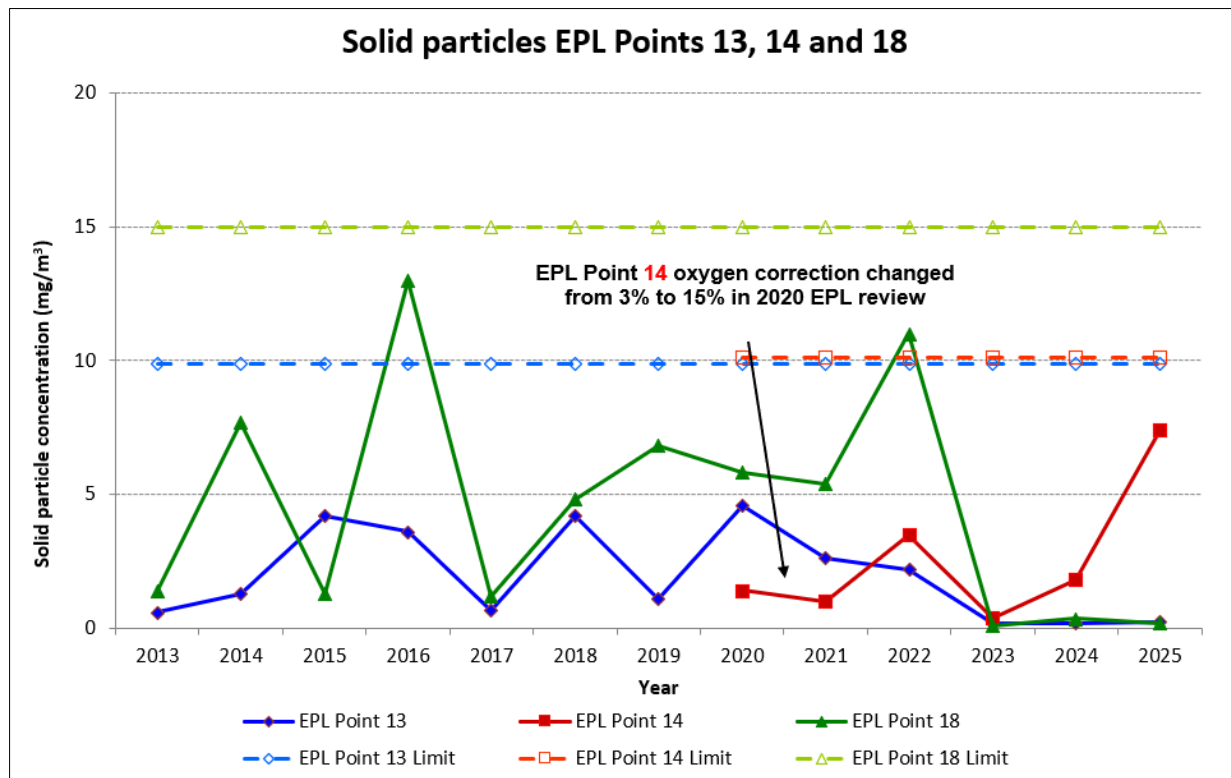


Figure A-8 Solid particles emission concentration - historical monitoring results for EPL Points 13, 14 and 18

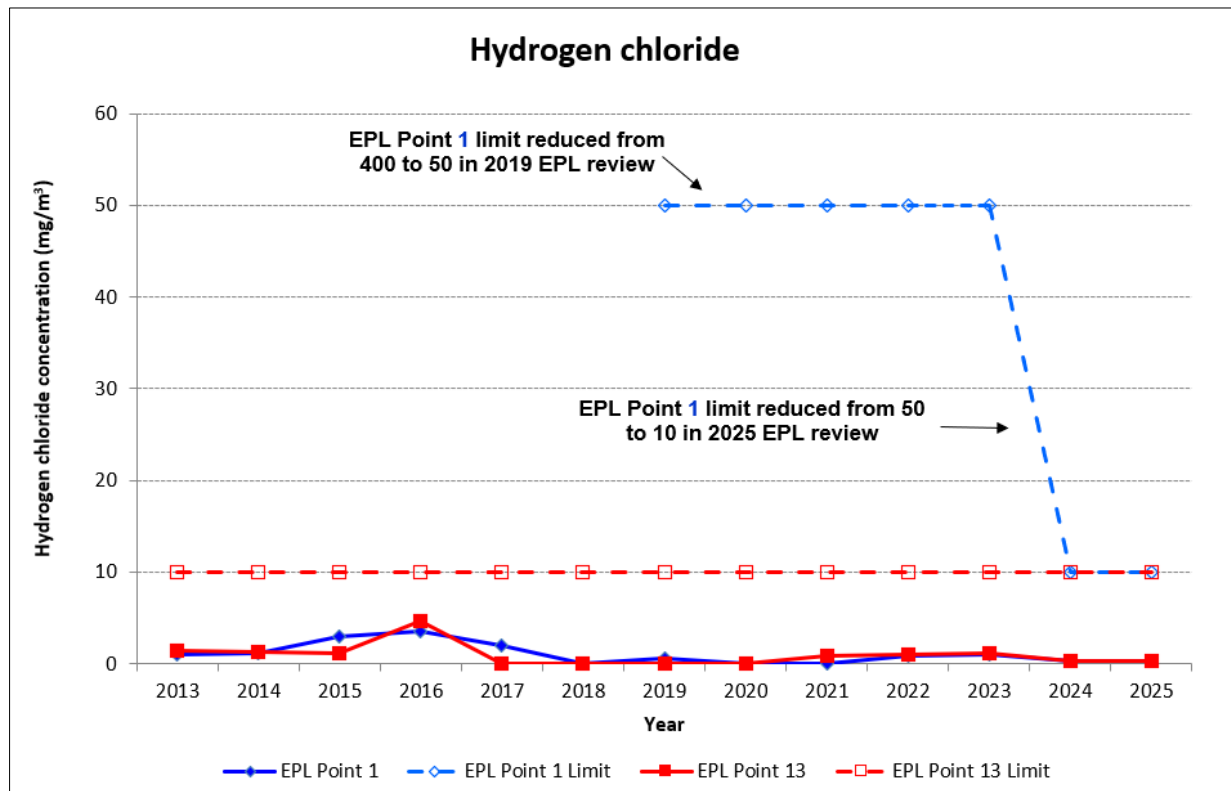


Figure A-9 Hydrogen chloride concentration - historical monitoring results

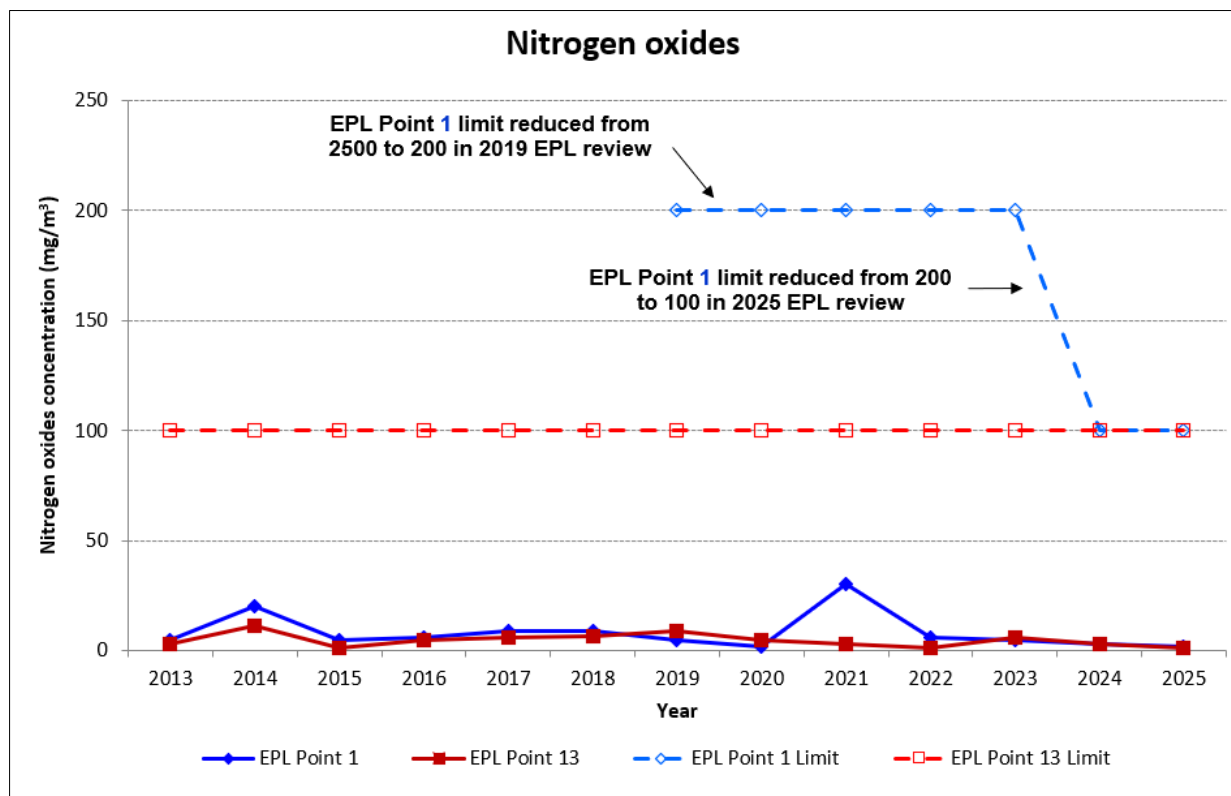


Figure A-10 Nitrogen oxides concentration - historical monitoring results

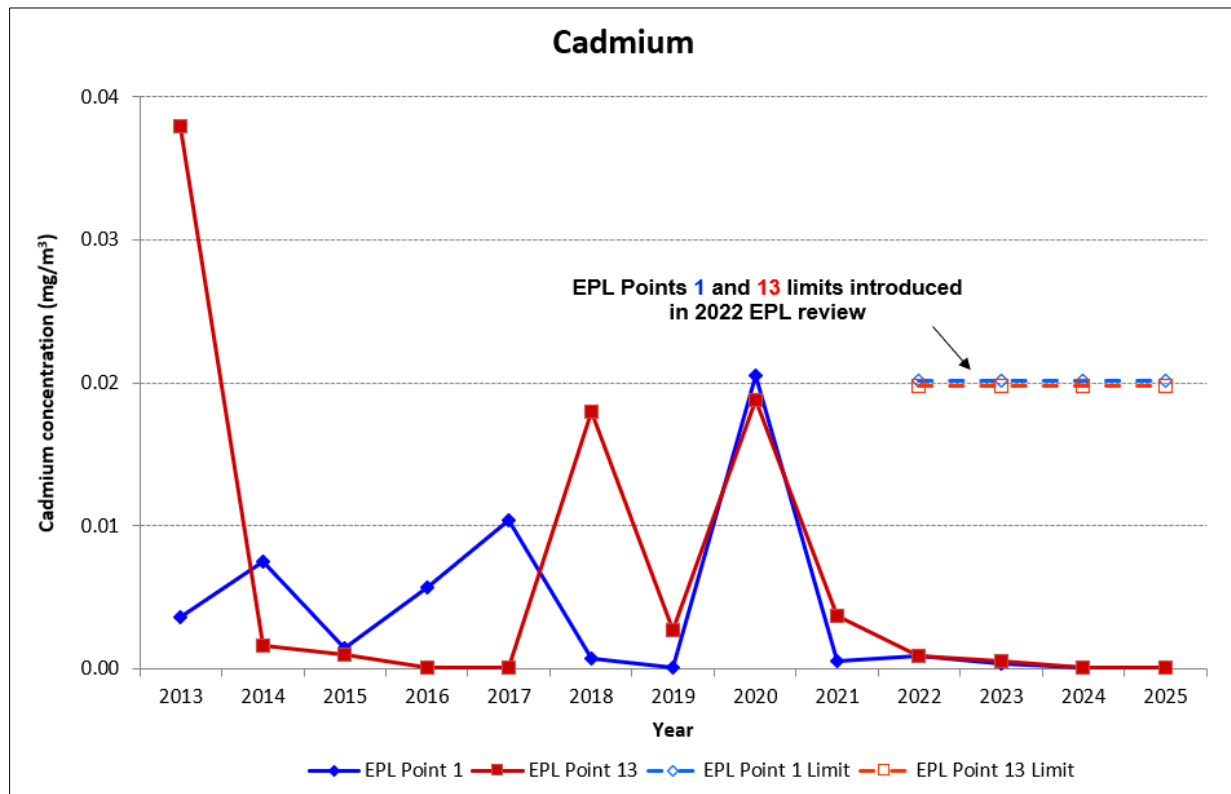


Figure A-11 Cadmium concentration - historical monitoring results

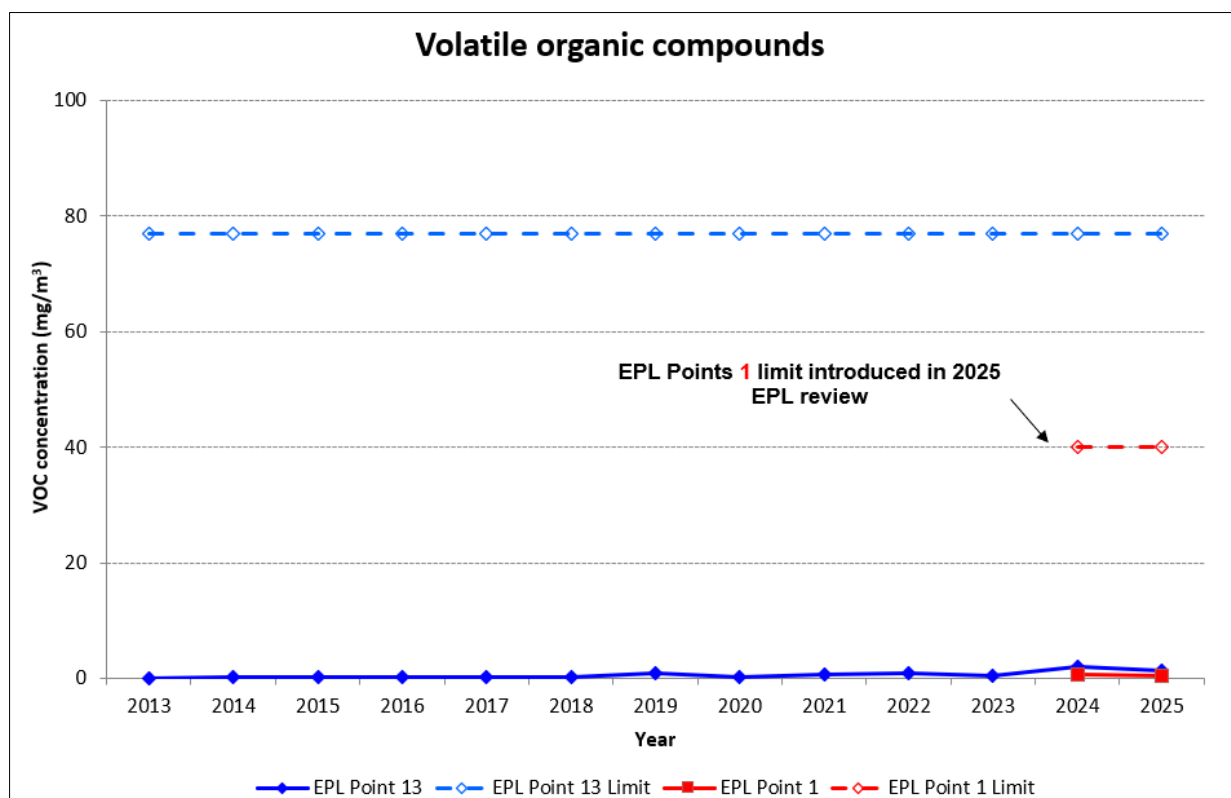


Figure A-12 VOC concentration - historical monitoring results

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		Prepared By:	C. McClung
		Authorised By:	G. Snedden
		Issue Date:	Oct 2025

APPENDIX C

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			Page No:	30 of 30
			Prepared By:	C. McClung
			Authorised By:	G. Snedden
			Issue Date:	Oct 2025

DECLARATION

Project Name	Weston Aluminium – Extensions to an existing aluminium dross recycling plant
Project Application No.	DA 86-04-01 MOD 16 and LEC 10397 of 1995 MOD 15
Description of Project	Concurrent Furnace Operation
Project Address	129 Mitchell Avenue Kurri Kurri NSW 2327
Proponent	Weston Aluminium Pty Limited
Title of Compliance Report	Operational Phase
Date	09 October 2025

I declare that I have reviewed the contents of the attached Compliance Report and to the best of my knowledge:

- the Compliance Report has been prepared in accordance with all relevant conditions of consent;
- the Compliance Report has been prepared in accordance with the Compliance Reporting Requirements;
- the findings of the Compliance Report are reported truthfully, accurately and completely;
- due diligence and professional judgement have been exercised in preparing the Compliance Report; and
- the Compliance Report is an accurate summary of the compliance status of the development.

Notes:

- 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) 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
- 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 Authorised Reporting Officer	Christopher McClung
Title	General Manager
Signature	
Qualification	B. Env. Sc (Chem Hons I)
Company	Weston Aluminium Pty Limited
Company Address	129 Mitchell Avenue Kurri Kurri NSW 2327