

Internal Environmental Audit Report

Lamberts North Project

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Contents

- 1. Introduction 3
- 2. Audit Objectives, Criteria & Scope..... 4
- 3. Methodology..... 5
 - 3.1.1 Documents considered 5
 - 3.2 Checklist preparation..... 5**
 - 3.3 Opening meeting 5**
 - 3.4 Closing meeting 6**
 - 3.5 Site inspection/Interviews 6**
 - 3.6 Documents and records 6**
 - 3.7 Audit report..... 7**
- 4. Compliance with Conditions of Approval 8
 - 4.1 Conditions of Approval 8
 - 4.2 Status of compliance..... 8
- 5. Conclusion..... 9

1. Introduction

An environmental audit was conducted to confirm environmental compliance with the Department of Planning and Environment (DPE) Conditions of Approval (CoA) for the Mt Piper Ash Repository Project 09_0186-Lamberts North. CoA B8 required Delta Electricity (now privatised EnergyAustralia NSW) to develop and implement a Compliance Tracking Program to track and report on compliance with all CoA's. In particular, B8 c) requires a program of independent environmental auditing with audits *“carried out in accordance with ISO 19011:2002 - Guidelines for Quality and or Environmental Management Systems Auditing”* with non-compliances to be rectified as per B8 d).

2. Audit Objectives, Criteria & Scope

The audit objective was to assess compliance with:

- Environmental mitigation measures stated in Operation Environmental Management Plans (OEMP) in relation to air quality;
- Environmental management protocols and controls stated in the Operational Environmental Management Plan (OEMP) in relation to air quality;
- Relevant Project Approval conditions and statement of commitments contained in the NSW Planning Approval of 16 February 2012.

The scope of the audit was to assess the standard of compliance with documented requirements / procedure(s) and to make recommendations, where appropriate, to enable improved environmental performance. This internal audit was conducted as part of the internal audit program specified for EMSAP-16 Internal Audit and the Lamberts North Compliance Tracking Plan that requires a 6 monthly audit be performed by the Environmental Representative. The scope of the audit was limited to implementation of obligations, commitments and environmental practices either at the time of the audit or in the preceding period.

3. Methodology

The on-site audit was conducted by Coleen Milroy, Environmental Representative for the Lamberts North project. The audit methodology consisted of:

- An audit opening meeting
- Completion of the audit, using the Audit Checklist to record the audit findings following
 - Interviews with EnergyAustralia NSW personnel / contractors / suppliers;
 - Examination of data, records, reports and checklists;
 - Review of procedures and processes used;
 - Site Inspections.
- An audit closing meeting;
- Completion of the audit report.

The audit was undertaken in accordance with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems Auditing.

3.1.1 Documents considered

A number of documents have been considered in preparing this Audit Report. This includes the following:

- Major Project Application 09_0186
- Mt Piper Ash Placement (two volumes) – Environmental Assessment (EA), prepared by SKM, August 2010.
- Conditions of this approval (dated 16 February 2012).

In addition to the above documents, the following documents were also reviewed for the checklist preparation.

- Lamberts North Ash Placement Project Operation Environmental Management Plan (OEMP) prepared by CDM Smith, dated May 2013.
- Environmental Protection Licence (EPL) 13007.

3.2 Checklist preparation

A checklist for the site audit was prepared based on the review of the documents listed in Section 3.1.1.

3.3 Opening meeting

An Audit opening meeting was held at 9.30am on Monday 12 October 2015 at Mt Piper Power Station. The meeting was attended by:

- Peter Griffiths (Environment Manager, EnergyAustralia NSW)
- Craig Tuffley (A/Contract Administrator for Lend Lease, EnergyAustralia NSW)

- Steven Thompson (Senior Environment Officer, EnergyAustralia NSW)
- Alicia De Vos (Graduate Scientist, EnergyAustralia NSW)
- Coleen Milroy (Audit Leader)

3.4 Closing meeting

An Audit closing meeting was held at 12.30pm on Tuesday 13 October 2015 at Mt Piper Power Station. The meeting was attended by:

- Peter Griffiths (Environment Manager, EnergyAustralia NSW)
- Wayne Gaynor (Contract Administrator for Lend Lease, EnergyAustralia NSW)
- Steven Thompson (Senior Environment Officer, EnergyAustralia NSW)
- Alicia De Vos (Graduate Scientist, EnergyAustralia NSW)
- Coleen Milroy (Audit Leader)

3.5 Site inspection/Interviews

An inspection of the Lamberts North site was undertaken on 12 October 2015 by Coleen Milroy. The auditor was accompanied by Alicia De Vos and Kerry Jones (Lend Lease). Prior to the inspection relevant documentation was reviewed and interviews were undertaken with relevant staff.

Those interviewed included:

- Jane Aiken (Environmental Team Leader / Scientist, Lend Lease)
- Peter James (Team Leader / Lend Lease)
- Steven Thompson (Senior Environment Officer, EnergyAustralia NSW)
- Alicia De Vos (Graduate Scientist, EnergyAustralia NSW)
- Kerry Jones (Lend Lease)

3.6 Documents and records

Project records and reports reviewed during the audit included the following:

- Complaints Register
- Repository Management Plan
- Operational Noise Review (Conditions of Approval E11)
- Audit reports applicable to Lamberts North
- Monitoring data:
 - Air quality
 - Weather monitoring
- Records and registers:

- Incidents register
- Risk register
- Complaints register
- Inspections records ie daily, weekly, monthly
- Plant and equipment inspection checks, servicing records
- Ash moisture content at placement and water usage

The weather on 12 October 2015 was sunny with light winds.

3.7 Audit report

Section 4 of the report provides a summary of the findings described in more detail in the checklists in Appendix A.

Table 1 defines the terminology used in the checklists and identifies the action required with respect to audit findings.

Table 1 – Definitions and action required

Audit Finding	Definition and Actions
Compliant	There is sufficient and appropriate evidence to demonstrate the particular requirement has been complied with and is within the scope of the audit.
Non-compliance	Clear evidence has been collected to demonstrate the particular requirement has not been complied with and is within the scope of the audit.
Observation	An observation made which does not directly relate to conformance.

4. Compliance with Conditions of Approval

4.1 Conditions of Approval

This section addresses Conditions of Approval D3 and aims to “*assess compliance with the requirements of this approval (09_0186), and other licences and approvals that apply to the project*”. A review of compliance with the Conditions of Approval is provided in **Appendix A**.

4.2 Status of compliance

The audit found that the operation of Lamberts North in regard to air quality was generally undertaken in accordance with the requirements of the Conditions of Approval.

Two non-compliances and one area of improvement relating to the Conditions of Approval were identified and are summarised in Table 2.

Table 2 – Summary of non-compliances and areas of improvement

Ref	Non-Compliances	Recommendation
5	The AQMMP Section 6.6.6 of the OEMP requires that samples will be removed from the dust deposition gauges on a monthly basis by a NATA approved laboratory and compared to baseline dust deposition monitoring records from Mount Piper, and the DECC amenity based criteria for dust deposition of 3.5 g/m ² /month (annual).	Monthly analysis is performed by NATA accredited laboratory. The results are updated into Air Quality database; however a baseline criterion is a blanket 4.0g/m ² /month (annual) which is not applicable to Lamberts North. Lend Lease also report in their monthly client report to the incorrect baseline for Lamberts North. It is recommended that the correct baseline criteria of 3.5 g/m ² /month is incorporated into the database for monthly comparison to ensure compliance with the AQMMP. It is recommended that Lend Lease amend their reporting criteria to the correct baseline.
17	Complaints AQMMP Section 6.6.5 OEMP requires that in the event of exceeded dust levels at the sensitive receiver locations, EnergyAustralia NSW shall carry out an investigation of TSP and/or PM ₁₀ to determine whether operations at Lamberts North were the potential cause of this exceedance. Specific criterion for PM ₁₀ and TSP has been provide in Table 6-24 performance indicators	Exceedances are currently investigated in the AEMR. It is recommended that the Air Quality database incorporate mechanisms to flag exceedances that will pre-empt investigations prior to the AEMR.
Ref	Areas of improvement	Recommendation
26	Reporting AQMMP Section 6.6.5 OEMP requires that in regard to any air quality/dust management, monitoring and any complaints will be provided in a Monthly Environmental Report.	Lend Lease report air quality/ dust management in client monthly compliance meeting and report to EnergyAustralia NSW. No reporting of air quality other than opacity is reported in EA NSW monthly compliance meetings. It is recommended including reference to air quality in EANSW monthly compliance meetings No complaints to date.

5. Conclusion

The audit was carried out generally in accordance with the requirements of ISO 19011:2002 Guidelines for Quality and ISO 14001:2004 Guidelines for Environmental Management Systems. The environmental management of the project, including environmental impact mitigation works were generally found to be effective. No complaints or incidents related to the Lambert North ash placement have been reported during operation. The audit found that both Lend Lease and EnergyAustralia NSW have well established inspection schedules and the information was readily available during the audit. Monitoring programs as required by the OEMP and Conditions of Approval are in place and monitoring data is available.

The audit found that the operation of Lamberts North was generally in compliance with the requirements of the approval of the project. Two non-compliances were identified and can be characterised as administrative issues. These indicate that EnergyAustralia NSW is generally compliant with a Condition of Approval, but requires some modification to ensure full compliance is obtained.

APPENDIX A

Table A: Audit Checklist see attachment