

Internal Environmental Audit Report Lamberts North Project

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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 and Scope

The audit objective was to assess compliance with:

- Environmental mitigation measures stated in Operation Environmental Management Plans (OEMP) in relation to complaints, communication and waste management;
- Environmental management protocols and controls stated in the Operational Environmental Management Plan (OEMP) in relation to complaints, communication and waste management;
- 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.
 - Examination of data, records, reports and checklists.
 - Review of procedures and processes used.
- Field Inspection for applicable items
- An audit closing meeting.
- Completion of the audit report.
- Plan any follow up corrective / preventative action/s.

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

3.1 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.

3.3 Opening meeting

An Audit opening meeting was held at 10:00 am on Monday 22 August 2016 at Mt Piper Power Station. The meeting was attended by:

- Wayne Gaynor (Contract Administrator for Lend Lease, EnergyAustralia NSW)
- Coleen Milroy (Audit Leader)
- Kyle Browne (Auditor)
- Steven Thompson (Senior Environment Officer, EnergyAustralia NSW)
- Craig Tuffley (Mechanical and External Plant Leader, EnergyAustralia NSW)

3.4 Interviews

Relevant documentation was reviewed and interviews were undertaken with relevant staff.

Those interviewed included:

- Jane Aiken (Environmental Team Leader / Scientist, Lend Lease)
- Alicia de Vos (Environment Officer)

3.5 Documents and records

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

- Mount Piper and Lamberts North Ash, Dust, Brine Repository Management Plan 2015
- Operational Noise Review (Conditions of Approval E11)
- Audit reports applicable to Lamberts North
- Records and registers:
 - Incidents register
 - Complaints register
 - Waste Transport register
 - Inspections records ie daily, weekly, monthly

3.6 Audit report

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

4.2 Status of compliance

The audit found that the operation of Lamberts North in regard to complaints, communication and waste management was generally undertaken in accordance with the requirements of the Conditions of Approval.

Zero non-compliances and five observations relating to the Conditions of Approval were identified and are summarised in **Table 2**.

Table 2 Summary of recommendations

Reference	Observation	Recommendation	Responsibility	Due Date
4.0 & 5.0	In the event of an Environmental Incident, there is no requirement for an Environment Personnel to notify and follow direction from, the Director-General (as per conditions E19 and E20)	Create a task in the Environment Standard Job for Environment /Community Complaints to include the notification of a regulatory authority if required and to follow their directions	Kyle Browne	11/10/2016
7.0	The Project Manager /Site Manager’s Responsibilities include adherence to community complaint procedures. Wayne Gaynor mentioned in the audit open meeting that there is only a verbal understanding that the Project Manager will notify the Contract Administrator of a complaint.	Review the OEMP and insert the responsibility of the Project Manager to communicate any complaints Lendlease receives, to the Contract Administrator.	Jane Aitken	11/10/2016
8.0	There isn’t a community complaints section within weekly and monthly communication documents between Lendlease and EnergyAustralia NSW. By inserting a complaint section, noting the absence of	Insert a community complaints section within communication channels between Lendlease and EA	Jane Aitken	11/10/2016

Reference	Observation	Recommendation	Responsibility	Due Date
	complaints will acknowledge the possibility and risk of this event.			
13.0, 14.0 & 17.0	There are no records (besides emails) regarding the acceptance of VENM waste from offsite.	Signed copies of the VENM certificate to be filed for future reference	Jane Aitken	11/10/2016
16.0	Waste tracking at Lamberts North is communicated verbally from truck drivers to the Environmental Representative, who then records it in a book. Comments were that the truck drivers only communicated these events if they remembered.	A waste tracking form should be developed and placed into all trucks. Current method of truck drivers notifying Jane Aitken of movements appears to happen infrequently.	Jane Aitken	11/10/2016

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.

The audit found that the operation of Lamberts North was generally in compliance with the requirements of the approval of the project. Zero non-compliances were identified that indicate that EnergyAustralia NSW is generally compliant with the Conditions of Approval. However five recommendations were put forward to improve environmental performance.

Appendix A – Audit Checklist