ENVIRONMENTAL MANAGEMENT STRATEGY

Bombala Sawmill Project
September 2021

Dongwha

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DOCUMENT CONTROL

Title	Environmental Management Strategy
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Revision 1	DWAU	First issue	24/11/2011	Approved
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GLOSSARY AND ABBRIEVIATIONS

ACHMP	Aboriginal Cultural Heritage Management Plan
AEMP	Air Emission Management Plan
AMMAAP	Approved Methods for the Modelling and Assessment of Air Pollutants in NSW
BOM	Bureau of Meteorology
DPIE	Department of Planning, Industry and Environment
DWAU	Dongwha Australia
DWRMMP	Dust and Wood Residue Management and Monitoring Plan
ECO	Emergency Control Organisation
EEP	Energy Efficiency Plan
EMS	Environmental Management Strategy
EPA	Environment Protection Authority
EPC	Emergency Planning Committee
EPL	Environment Protection Licence
LMP	Landscape Management Plan
NGER	National Greenhouse and Energy Reporting
NPI	National Pollutant Inventory
NRC	Natural Resources Commission
NOW	New South Wales Office of Water
NSW	New South Wales
OSD	On-site detention
PIRMP	Pollution Incident Response Management Plan
PMP	Product Management Plan
PM_{10}	Particulate matter of size 10 μm
RAP	Remedial Action Plan
RNP	NSW EPA Road Noise Policy
SEPP	State Environmental Planning Policy
SMS	Safety Management System
SWMP	Soil and Water Management Plan
WHS	Work, Health and Safety

1. BACKGROUND

1.1 INTRODUCTION

Dongwha Australia (DWAU) Environmental Management Strategy (EMS) 2021 has been prepared in accordance with the requirements of **Project Approval PA07_0161 (MOD4)**. PA07_0161 was granted under section **75J of the Environmental Planning and Assessment Act 1979 (EP&A Act)** on 7th September 2010. The EMS takes into consideration the commitments stated in Environmental Assessment, Independent environmental audit, various development consent conditions and license conditions. DWAU's Environmental Management Strategy (2021) includes current environmental plans and strategies. It provides a strategic framework for planning and decision making, monitoring of actions and reporting of those. This Environmental Management plan has been in effect for DWAU to ensure its compliance with current environmental & legal requirements and continue to improve performance in future.

DWAU (trading as Tasco) was founded in 2011 in Australia as DWAU's directly managed overseas production base through acquisition of Willmott Timbers. DWAU operates a saw mill and timber production facility at Sandy Lane, Bombala. Operations began on site in 1979, and the mill had a number of owners over the past 39 years. During that period many developmental consents/building permits had accumulated for various upgrades and expansions on site.

In September 2010, DWAU gained approval from the Department of Planning and Environment (DP&E) now known as the Department of Planning, Industry and Environment (DPIE) to redevelop the site. Since then, four modifications to this consent were approved-the most recent being MOD4. The conditions of the consent were modified as a result of these changes.

DWAU was built on government subsidies to boost its role in improving the regional economy. It produces a wide range of products such as lumber and decks, and plays an important role in the development of Australia's timber industry using DWAU's outstanding technologies and expertise.

The condition for the EMS is reproduced in Table 1-1:

Table 1-1: Project Approval MP07_0161 (MOD4) – Schedule 4, Condition 1

Condition	Section of Document Addressing Condition
Environmental Management Strategy The Proponent must prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. The strategy must:	
(a) be submitted within 2 months of the date of this approval and approved by the Secretary prior to carrying out any construction;	Section 1.3
(b) be revised and approved by the Secretary, prior to the commencement of operations of the new: dry mill or treatment plant or green mill or boiler/s or kiln or steamer/s or vacuum pump or wastewater tank flue (as described in the EA and 07_0161 MOD 1);	Section 1.3**Error! Reference source not found.**
(c) provide the strategic context for environmental management of the project;	Section 2.2
(d) identify the statutory requirements that apply to the project;	Section 2.3

Table 1-1: Project Approval MP07_0161 (MOD4) – Schedule 4, Condition 1

Condition	Section of Document Addressing Condition
(e) describe in general how the environmental performance of the project would be monitored and managed;	
(f) describe the procedures that would be implemented to: • keep the local community and relevant agencies informed about the operation and environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • manage cumulative impacts; • respond to emergencies; and	Section 4
(g) describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the project.	Section 3

1.1.1 Facility Location

The site street address is 1 Sandy Lane, Bombala and includes the following allotments:

- Lot 2 DP 1016573; and
- Lot 27 DP 1061792

The site is located approximately 2 km south-west of the township of Bombala. The site is surrounded by two private properties; also including a farmland.

The entrance to the site is approximately 700m from the intersection of the Monaro Highway and Delegate Bombala Road. The Bombala River is approximately 1 km to the north-east, and two of its tributaries – Parsonage Creek and Saucy Creek – are located 120 m to the north and 650 m to the west respectively.

1.1.2 Site Description

DWAU's timber processing facility is located on the western side of Sandy Lane, Bombala to the south of Delegate Road and west of the Monaro Highway. The site has an approximate area of 380,000 m^2.

The Facility comprises of the following main components:-

- Green Mill;
- Dry Mill;
- Satellite Building;
- Treatment Plant;
- Despatch Building;
- Kilns, Boiler, Weighbridge, Workshop;

- 4 ponds-Pond 1 ,Pond 2 , Northern Pond and Southern Pond;
- Self-Bunded above ground fuel tank of 70,000 L capacity;
- Internal Roads, car parking; and
- Administration Building and amenities.

There are other storage areas on the site like TTSA Storage area and Dry Timber Storage area. Components of the old treatment area still exist on site and are to be removed and remediated.

The daily operations' at the facility as follows:-

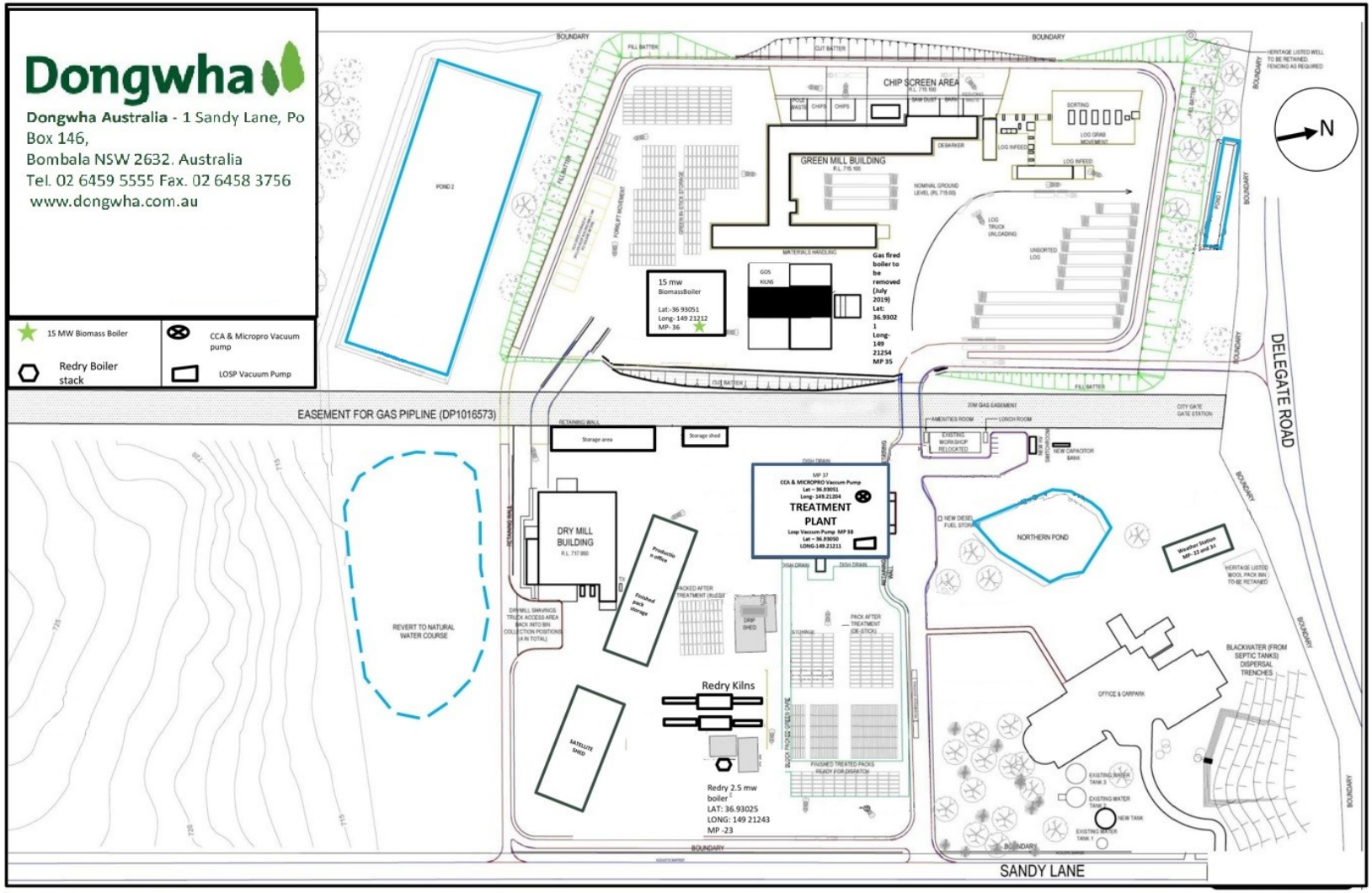
- **Green Mill** (06:00 to 16:00) and **Log Sorting Line** starting at 06:00;
- **Log Yard** Loading and unloading of trucks , including allowable hours of truck movements (06:00 to 16:30);
- **Dry Mill** (04:00 to 01:00)
- **Satellite** (04:00 to 01:00)
- **Treatment Plant** –(06:00 to 23:00), Monday –Friday
- Kilns and Boilers, etc – 24 hours

The main entry to the site is located on the Eastern side of the complex facing Sandy Lane. There are 2 entry points to the Sandy Lane site. There is a point of entry to the main administration office and a point of entry to the Operations site.

An aerial photograph of the site and surrounds is provided as Figure 1-1 and a basic site layout is provided as Figure 1-2.

Figure 1-1: Aerial Photograph of DWAU and Surrounds

Figure 1-2: Basic DWAU Site Layout



1.2 PURPOSE OF THE ENVIRONMENTAL MANAGEMENT STRATEGY

The purpose of this strategy is to provide effective environmental management of all DWAU operations at the Sandy Lane Site including identifying and implementing:

- The strategic context for the environmental management of DWAU's site
- Roles, responsibilities, authority and accountability of all key personnel involved in the environmental management of the site
- Statutory requirements that apply to the site
- Procedures to keep the local community and relevant agencies informed about the operation and environmental performance of the site
- Procedures to receive, handle, respond and to and record complaints
- Procedures to resolve any disputes that may arise during the course of the site
- Procedure to respond to any non-compliance
- Procedures to manage cumulative impacts
- Procedure to respond to emergencies
- A plan for monitoring the environmental performance of the site; and
- A framework for review and continual improvement

1.3 CONSULTATION

The first issue of this EMS was approved on 24 November 2011 and was prepared in consultation with the DPIE and EPA. A general revision was undertaken in 2018-19. This report presents revision 3 of the EMS.

2. ENVIRONMENTAL MANAGEMENT

This document details the Environmental Management Strategy for DWAU including the strategic context for environmental management of the site, organizational responsibilities, planning activities, procedures, monitoring, implementation and review. It is the main component of the overall environmental management system for DWAU.

In addition to complying with regulatory requirements, DWAU commit to implementing plans and policies that have been developed in consultation with relevant government agencies and departments including:

- Aboriginal Cultural Heritage Management Plan;
- Air Emission Management Plan;
- Dust and Wood Residue Monitoring and Management Plan;
- Energy Efficiency Plan;
- Landscape Management Plan
- Product Management Plan;
- Remedial Action Plan;
- Safety Management System
- Soil and Water Management Plan;
- Pollution Incident Response Management Plan

2.1 DWAU MANAGEMENT

As part of environmental progress, DWAU's management team will make sure that they will comply with all relevant legislation and policies (Please refer DWAU's Environmental Policy statement – Appendix 1).

DWAU's management will annually review and identify:

- If objectives and targets are being met
- Consider all community concerns and significant environmental aspects during operations
- How operation's environmental aspects can be improved upon

The Managing Director is responsible for ensuring the environmental programs are implemented and reviews are undertaken annually, including feedback and lessons learnt in the workplace to ensure satisfactory progress towards all environmental objectives and targets.

2.2 STRATEGIC CONTEXT

2.2.1 Relevant Legislation

The following key legislation relevant to the environmental management of DWAU includes:

- **Protection of the Environment Operations Act 1997 (PoEo Act)** is administered by the EPA. The POEO Act establishes the procedures for issuing licenses for environmental protection including waste, water, air, water and noise pollution control. The owner or occupier of the premise that is engaged in the scheduled activities is required to hold an Environment Protection License (EPL) and comply at all times with the condition of that license.

DWAU holds **EPL 11205** for its operations including > 200,000 m^3 of wood or timber milling processing, and 30,000 m^3 of wood preservation activities. The EPL was granted 19 April 2010, includes aspects of air, water, applications to land and noise pollution and is reviewed annually.

- **Protection of the Environment Operations (Clean Air) Regulation 2002**- DWAU is required to comply with Group 4 emissions under Schedule 4 and Group 6 emissions.

- **Contaminated Land Management Act 1997** - The act establishes process for investigating and remediating contaminated land, which applies to any remediation works for the DWAU site.

- **Environmental Planning and Assessment Act 1979** - This act has conditions which are required to:
  (a) Prevent and minimize, adverse environmental impacts;
  (b) Set standards and performance measures for acceptable environmental performance
  (c) Require regular monitoring and reporting; and
  (d) Provide for the ongoing environmental management of the site.

  Project approval 07_0161 was granted under section **75J of the Environmental Planning and Assessment Act 1979 (EP&A Act)** on 7th September 2010 and was also modified under 75W of EP&A Act. PA07_0161 (MOD4) is the most recent approval.

- **Water act 1912:** DWAU has complied with all the requirements of this act. This act requires a license for all groundwater works, including boreholes.

The above key legislation and other relevant NSW legislation and applicability to the site is identified in the legal register in Appendix 2.

2.2.2 Guidelines And Australian Standards

The following guidelines and Australian standards are relevant to the management of DWAU.

- Storage and handling liquids: Environmental Protection – Participants Manual
- AS 1940-2017 the storage and handling of flammable and combustible liquids
- AS/NZS 2843.1:2006 timber preservation plants – Timber preservation plant site design
- AS/NZS 2843.2.2006 Timber preservation plants-Timber area operations
- AS 2890.1.2004:Parking facilities- Off-Street Parking
- AS 2890.2:2018: Parking facilities-Off-street commercial vehicle facilities
- AS 4282:2019(INT)-Control of obtrusive effects of outdoor lighting
- Austroads pavement design guide
- NSW EPA Noise Policy for Industry (2017)

2.3 STATUTORY OBLIGATIONS

Statutory obligations that apply to the site are the conditions of the Project Approval 07_0161 (MOD4) and requirements of the Environment Protection Licence (EPL) No. 11205. A copy of the most recent versions of these documents shall be kept on site at all times.

Conditions relating to the ongoing environmental management of the site and how these are addressed within this strategy have been identified in in the legal register provided as Appendix 2 to this EMS. Any condition that has been verified as being complete in the recent independent environmental audit has not been included.

3. IMPLEMENTATION & OPERATION

3.1 ROLES, RESPONSIBILITIES, AUTHORITY AND ACCOUNTABILITY

The organizational chart describes the current senior roles and hierarchy of accountability for DWAU. Responsibilities and authorities are described further underneath for key personnel involved in the environmental management of DWAU (Please refer the Organizational Chart – Appendix 3).

Managing Director's responsibilities include:

- Providing leadership and governance in overall environment management of DWAU, including endorsement of environmental objectives and targets;
- Ensuring adequate resources and funding is available for proper management of DWAU

The **General Manager** has overall responsibility for the implementation of this strategy and reports to DWAU's Managing Director. Specific environmental tasks include:

- Being responsible for all environmental related communication, with interested external parties and regulatory parties.
- Ensuring the environmental programs are implemented and reviews are undertaken annually, including feedback and lessons learnt in the workplace to ensure satisfactory progress towards all environmental objectives and targets.
- Recommending to DWAU's Managing Director's objectives and targets for higher risk environmental activities of the Facility.
- Notifying Managing Director and if necessary government authorities and agencies of any incident.
- Being familiar with the relevant regulatory requirements.
- Ensuring compliance of activities with the relevant management plans.
- Complying with requirements of the license issued by EPA.
- Stopping operations if unacceptable impact on environment is identified.

The **Operations Manager** tasks include:

- Being familiar with the relevant regulatory and operational requirements and their impacts on operations.
- Ensuring compliance of activities with the relevant management plans.
- Be responsible for ensuring the adequacy of the strategies, plans and programs.
- Ensuring a Hazard Incident Investigation occurs following any incident and that the Managing Director is informed.
- Complying with the requirements of the license issues by EPA.
- Ensuring that all the employees and contractors are working in accordance with the requirements of the Environmental Management Plan.
- Monitoring and taking action to ensure that all the requirements are implemented throughout the life of workplace.
- Reviewing corrective and preventative actions to monitor the implementation of recommendations made from audits/site inspections.
- Stopping work if unacceptable impact on the environment is identified.

The **Environmental Manager and Environmental Compliance Officer's** tasks include:

- Complying with the relevant regulatory requirements identified in the management plans.
- Exercising an appropriate level of due diligence in enforcing work practices that minimize adverse environmental impacts.
- Complying with the requirements of the license issued by EPA.
- Providing direction and guidance to leading hands to implement the management plans.
- Ensuring that all environmental incidents are reported and investigated in accordance with the Incident Response Plan.
- Stopping work if unacceptable impact on environment is identified

The **Leading Hands'** tasks include:

- Complying with the relevant regulatory requirements identified in the management plans.
- Complying with requirements of the license issued by the EPA.
- Exercising an appropriate level of due diligence in enforcing work practices that minimize adverse environmental impacts.
- Supervising all employees and contractors in the environmental standards required in their work.
- Ensuring the development of Environmental Controls for the work activity.
- Ensuring that all employees and contractors in workplace comply with environmental requirements.
- Requiring all employees and contractors to report environmental risks or hazards.
- Liaising with employee trades, sub lessees, contractors and subcontractors so that prompt responses are given when environmental issues are raised.
- Periodically monitoring activities to evaluate compliance with the management plans. Periodic monitoring must involve site inspections of active work sites.
- Raising any non-compliance with the management plans observed or identified.
- Stopping work if unacceptable impact on environment is identified.

In addition, all other employees, contractors and subcontractors have an obligation to protect the environment through carrying out their own work with due diligence. In particular, they must:

- Comply with statutory and operational requirements
- Report any incident that may result in environmental harm that arises in course of, or in connection with, their work.
- Implement practical ways to control environmental risk.

3.2 ENVIRONMENTAL TRAINING

All the people involved with DWAU have received relevant environmental training to ensure they understand their responsibilities when implementing the environmental management plan. People who are trained include those at site of all activities and operations, including contractors, subcontractors and visitors. The training should be tailored to the role of an individual in the site.

The training include:

- Site inductions
- Identification of key points of environmental value and any relevant matters of national environmental significance

- Understanding the requirements of the environmental management plan and the individual's role
- Environmental incident emergency response procedures
- Site environmental controls
- An outline of the potential consequences of not meeting their environmental responsibilities

Records of all training conducted should be maintained and include:

- The person receiving the training
- The date the training was received
- The name of the person conducting the training
- A summary of the training

3.3 OBJECTIVES & TARGETS

A set of environmental objectives and performance targets has been prepared in relation to DWAU's site operations.

Objectives	Actions	Performance indicators and Targets	Responsibility
Maintain 100% environmental Compliance	1. Implement this EMP 2. Internal audits by DWAU 3. External audits every 3 years 4. Undertake annual review 5. Undertake weekly inspections	No compliance issues No complaints All monitoring requirements under the EPL and Project Approval are met	Managing Director
Prevent surface water, groundwater and land contamination	1. Implement SWMP 2. Regular Monitoring as per SWMP 3. Undertake weekly inspections	• Monitoring results for soil, surface water, groundwater under set criteria (SWMP) • Monthly inspection checklist complete and issues dealt with as soon as practicable.	Environmental Compliance Officer Leading Hands
Minimise air emissions	1. Implement DWRMMP 2. Implement AEMP 3. Undertake stack testing 4. Undertake weekly inspections	No air complaints Compliance with EPL Limits	Environmental Compliance Officer
Minimise noise emissions	1. Undertake noise monitoring 2. Undertake weekly inspections	No noise complaints Compliance with noise limits	Environmental Compliance Officer

Objectives	Actions	Performance indicators and Targets	Responsibility
Reduce waste generation	1. Implement PMP 2. Maintain waste records 3. Identify opportunities for waste minimisation and reuse options	Reduced waste generation by 5% per year Reduce waste to landfill by 5% per year	Environmental Compliance Officer
Minimise risk of spills	1. Ensure integrity of bunded areas 2. Undertake weekly inspections	No incidents	Safety Officer
Improve visual amenity of site	1. Implement LMP 2. Undertake weekly inspections	Planting survival rate 90-95%	Environmental Compliance Officer

4. PROCEDURES

4.1 COMPLAINTS HANDLING PROCEDURE

Environmental compliance officer shall be responsible for all the compliant related communication with external parties and regulatory parties.

The complaints management system includes a telephone number- ***(02) 6459 5560*** that community complaints maybe registered on , and a postal address (1 Sandy Lane, Bombala, NSW, 2632) to which written complaints may be sent. The contact details will be advertised at the site entrance and on website. Details of all complaints received will be recorded in an up to date Complaints register. The Register shall record, but not necessarily be limited to:

- The date and time , where relevant , of the complaint
- The means by which the complaint was made (telephone or mail)
- Any personal details of the complainant that were provided , or if no details were provided , a note to that effect;
- The nature of the complaint;
- Any action(s) taken by the management in relation to the complaint , including any follow-up contact with the complainant; and
- If no action was taken by the management in relation to the complainant , the reason(s) why no action was taken

Compliance officer shall refer the complaint to the appropriate party and acknowledge receipt of the complaint within 24 hours.

The officer shall make the Complaints Register available to the Council and the Secretary of DPIE for inspection upon request. Information on all complaints received, including the means by which they were addressed and whether resolution was reached will be included in the Annual Review Report.

4.1.1 Dispute Resolution Procedure

Overtime disputes can arise either internally within the organization, with the community or with the regulatory authorities. In all circumstances, DWAU shall generally adopt the following hierarchy of dispute resolution:

- Negotiation. In most cases DWAU shall first try to resolve the dispute amicably with the other party
- Meditation .If negotiation is unsuccessful DWAU shall consider meditation assisted by an independent third party
- Arbitration/Adjudication. Where negotiation or meditation has failed or on highly technical issues DWAU may seek arbitration. The court would adjudicate where there has been a breach of law

4.1.2 Non-Compliance Procedure

A non-compliance is defined as a failure to comply with environmental legislation or with management plan requirements.

All employees have the authority to raise a non-compliance or preventive action should they occur. The non-compliance report should identify root cause and preventative or corrective action. Non-compliance are forwarded to the responsible manager to determine appropriate actions and dates. On completion of agreed actions, the nominated manager signs-off the non-conformance.

Where appropriate, work on non-complying activities maybe stopped by authorities. This stoppage remains in force until corrective action is implemented or authority is given to continue.

4.2 INCIDENT RESPONSE

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)
DWAU's PIRMP is to be immediately implemented in the event that a pollution incident occurs at DWAU's site such that material harm to the environment is caused or threatened.

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN PURPOSE
A "pollution incident' includes a leak, spill or escape of a substance, or circumstances in which this is likely to occur. According to the POEO Act, DWAU must prepare, keep, test and implement a pollution incident response management plan. The purpose of this management plan is to provide a consistent and effective emergency response to any chemical spills which may impact on the site and its surrounding areas, including the control of water levels in our dams which may flow into neighbouring rivers and banks.

Please refer DWAU's PIRMP.

4.3 EMERGENCY MANAGEMENT PROCEDURES

DWAU's Emergency Management Procedures include procedures for Internal and External Crisis Situations.

Potential Internal crisis situation include:

- Fire/Explosion
- Bomb threat
- Medical emergency
- Severe weather/storm damage
- Lightning
- Large chemical spills
- Industrial unrest/riot/assault Disgruntled employee
- Earthquake/Seismic event
- Pandemic
- Flooding
- Hostage situation
- Extortion-Threat against company/employee
- Terrorist attack

While potential external crisis situation includes Fire on adjoining properties.

For the Emergency Management Procedure, there are two main structured groups - Emergency Control Organization (ECO) and Emergency Planning Committee (EPC). ECO is a structured group that will initiate an appropriate response to an emergency. The group consists of employee representatives such as Emergency Controller and Area Wardens. EPC is a group responsible for establishing an emergency plan, emergency response procedures and ECO.HR /Compliance

Manager, Environmental Compliance Officer, WHS officer and Managers of relevant departments. Compliance officer/Manager should ensure that an appropriate form of consultation is implemented within the workplace in relation to emergency response procedures. These procedures shall be reviewed and updated by WHS officer to ensure they comply with Safety Management System plan prepared.

The emergency procedures and contact details, shall be prominently displayed in various locations on Site. WHS officer shall also enlist local emergency response crews to carry out mock drills to test these procedures and preparedness of site and emergency personnel. WHS officer shall be notified of all environmental incidents and shall ensure a Hazard Incident Investigation has occurred.

NSW EPA and Secretary of DPIE shall be notified of any incident with actual or potential significant off-site impacts on people or the biophysical environment as soon as practicable upon becoming aware of the incident. DWAU shall provide full written details of the incident to the Council and the Secretary within 7 days of the date on which the incident occurred (COA Schedule 4, 4).

5. MONITORING, REVIEW AND IMPROVEMENT

5.1 ENVIRONMENTAL MONITORING

Environmental monitoring is used to check the performance of the operation against regulatory standards and planning initiatives. Records of all environmental monitoring and results are kept on the site and monitoring results required under the EPL are available on the website.

5.1.1 Analysis and Reporting Procedures

Compliance officer will review all environmental monitoring results on a regular basis to ensure compliance with all statutory, legislative and approval requirements, and to identify where results or trends indicate any non-compliance to the development consent criteria or other approval conditions. The results of all environmental monitoring will be included while doing EPA annual return and also included in the environmental management strategy annually.

DWAU's compliance with the Project Approval and EPL conditions is assessed by a 3 year independent environmental audit.

5.1.2 Procedure For Exceedance Of Criteria Or Threshold

If the monitoring show that the relevant criteria or threshold has been exceeded, the company will conduct an investigation into the potential sources and/or causes. The investigation will consider all the factors that may have resulted in exceedance. If the company is responsible, further actions will be taken to address the matter. A report will be supplied to both DPIE and EPA.

The report will:

(a) Describe the date , time and nature of the incident;
(b) Identify the cause or likely cause of the incident
(c) Describe the action taken; and
(d) Describe the proposed measures to address the incident.

If the results of the environmental monitoring identify impacts generated by the site are greater than the relevant impact assessment criteria, except where a negotiated agreement has been entered into in relation to that impact.

Different types of monitoring is done to review the environmental performance of DWAU.

5.1.3 Routine Monitoring

Leading hands shall undertake weekly inspections of the site ensuring compliance with relevant environmental requirements and management plans. Checklist should be retained as part of the record of inspection.

5.1.4 Noise Monitoring

Environmental Compliance Officer engages a noise consultant to conduct an Environmental Noise Compliance Assessment annually. Noise monitoring is to be undertaken in accordance with conditions L4.1 to L4.8 of the EPL.

The report must satisfy the following:

- Validate the predictions made in environmental assessment
- Demonstrate compliance with the limits specified in the Conditions of Approval;
- Demonstrate the noise controls are working effectively; and
- If any non-compliances are detected , describe the measures that are to be implemented and timing for implementation of these measures , to ensure compliance

The report shall be submitted to the DPIE Secretary and EPA.

5.1.5 Air Quality Monitoring

Environmental compliance officer shall ensure that Air quality monitoring plan is part of the environmental management strategy. The Air Emissions Management Plan describes a program for the ongoing monitoring and reporting of air emissions from the site, describing the location , frequency, method and pollutants to be monitored. Air monitoring required shall be undertaken in accordance with relevant conditions in the EPL.

5.1.6 Chemical Storage

Compliance officer shall maintain an inventory system that accurately measures and reports on production losses of chemical stored on site. The compliance officer should also ensure an early warning leak detection and prevention system is installed and maintained and the integrity of bunds, tanks and pipelines are regularly assessed. This is as per the Pollution Incident Response Management Plan.

A site manifest will also be maintained for hazardous chemicals stored at the site as per Schedule 12 of the Work Health and Safety Regulation 2017.

5.1.7 Energy Monitoring

The National Greenhouse and Energy Reporting (NGER) scheme, established by the National Greenhouse and Energy Reporting Act 2007 (NGER Act), is a single national framework for reporting and disseminating company information about energy consumption and emissions.

The objectives of the NGER scheme are to:

- Inform government policy
- Inform the Australian public
- Helps meet Australia’s international reporting obligations
- Assist Commonwealth , state and territory government programs and activities
- Avoid duplication of similar reporting requirements in states and territories

DWAU annually submits a report detailing information about greenhouse gas emissions, energy production, energy consumption and other information specified under NGER legislation.

5.1.8 Soil And Water Monitoring

Environmental Compliance officer has engaged a specialist environmental consultancy to implement a soil and water monitoring program that:

- Establishes existing soil , surface and groundwater quality;
- Identifies potential pollutants from the site;
- Identifies the soil, surface water , groundwater and wastewater impact assessment criteria;
- Identifies and justifies monitoring locations, sampling frequencies and methods;
- Establishes procedures for assessment and reporting of monitoring results; and
- Outlines contingency measures if exceeds are identified.

5.1.9 Weather Monitoring

The meteorological parameters that must be measured are:

- Air temperature
- Wind direction
- Wind speed
- Sigma theta (a measure of wind direction fluctuation)
- Rainfall
- Relative humidity

The monitoring station is located to the west of the administration building on the site. The station is well maintained and capable of monitoring the parameters specified in the environmental protection license document. The data can be used for assessment and modelling purposes. DWAU records weather data on quarterly basis.

5.1.10 Product Management Plan

As per the project approval MP 07_0161, DWAU has prepared a product management plan. EPA was also consulted, while preparing and revising the plan. The product management plan must:

(a) Identify the types and sources of materials and resources used in the production process, including a waste minimization and management method
(b) Identify potential environmental impacts and liabilities at each stage of product's lifecycle
(c) Describe, classify and quantify the waste produced in the production process and include measures to maximize reduction, reuse and recycling of this waste.
(d) Describe how the effectiveness of the plan would be monitored and reported.

5.1.11 Monthly Checklist

Leading Hands for each process area undertake monthly inspections of each area as per Internal Environmental Checklist (Appendix 4).

Issues identified should be discussed in Regular Toolbox talks / Safety Meetings.

5.2 ENVIRONMENTAL MONITORING PLAN

Environmental monitoring required is described in detail in the relevant monitoring and management plans as discussed in the previous section.

A recommended environmental monitoring and inspection plan summarising DWAU's monitoring requirements is presented as Table 5-1. The results from such monitoring are aimed at safeguarding the environment from long term degradation.

Table 5-1: Monitoring & Inspection Plan

Aspect	Requirement	Frequency / Due Date	Process / Plan	EPA Identification Points	Evidence
Noise Compliance Monitoring	EPL Conditions L4.1 to L4.8 and M7.1	Annually Due: February	Noise compliance report to be undertaken by a suitably qualified acoustic consultant in accordance with EPL conditions at the locations EPA identification points 32 and 33	Points 32, 33	Annual Noise Compliance Report
Noise Validation Monitoring	PA07_0161 Sch 3, Conditions 9 and 11	In the event of a complaint or upon request from the Secretary	Noise Validation Report undertaken by a suitably qualified acoustic consultant in accordance with the Noise Policy for Industry (2017) and: • Be submitted to EPA and DPIE within 1 month of complaint/request; • Validate predictions with limits in Project Approval; • Demonstrate noise controls are working effectively; and If any non-compliances are detected, describe the measures that are to be implemented and timing for completion.	Points 32, 33	Noise Validation Report
Air Emission Monitoring (Stack Testing)	PA07_0161 Sch 3, Condition 5 EPL Conditions L2.2 & M2.2, M3.1	Points 23, 36 – Every 6 months Due: February & August Point 37 – Annually Due: August	Stack testing to be undertaken by a suitably qualified consultant in accordance with Air Emission Management Plan and Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, and relevant requirements. For EPL Identification Points 23, 36 and 37.	Points 23, 36, 37	Emission Testing Report

Table 5-1: Monitoring & Inspection Plan

Aspect	Requirement	Frequency / Due Date	Process / Plan	EPA Identification Points	Evidence
Weather Monitoring	PA07_0161 Sch 3, Condition 7 EPL Conditions M4.1 to M4.3	Continuous monitoring	Automated Weather Station to be monitored as per sampling methods under EPL Condition M4.2 and M4.3 and the Approved Methods for Sampling and Analysis of Air Pollutants in NSW.	Points 22, 34	Weather data print out
Soil Monitoring	EPL Conditions M2.3	Every 6 months Due: February & August	Soil sampling and reporting to be undertaken by a suitably qualified consultant as per the Soil and Water Monitoring Program within the Soil and Water Management Plan, and EPL Condition M2.3.	Points 1, 2, 3, 4	Monitoring Report
Surface Water Monitoring	EPL Conditions M2.3	Every 6 months Due: February & August	Water quality monitoring and reporting to be undertaken by a suitably qualified consultant as per the Soil and Water Monitoring Program within the Soil and Water Management Plan, and EPL Condition M2.3.	Points 5, 6, 7	Monitoring Report
Groundwater Monitoring	EPL Conditions M2.3	Annually Due: August	Groundwater monitoring and reporting to be undertaken by a suitably qualified consultant as per the Soil and Water Monitoring Program within the Soil and Water Management Plan, and EPL Condition M2.3.	Points 10 to 19	Monitoring Report
Energy Monitoring	PA07_0161 Sch 3, Condition 33(e)	Annually	As per Energy Efficiency Plan, monitoring of electricity, gas, biomass and fuel (eg: diesel) usage is to be undertaken by DWAU employees.	N/A	Energy Efficiency Plan – Annual Data
Waste	N/A	As required	Maintain records of waste disposal and classification as per Product Management Plan and Dust and Wood Residue Monitoring and Management Plan.	N/A	Waste tracking and classification records

Table 5-1: Monitoring & Inspection Plan

Aspect	Requirement	Frequency / Due Date	Process / Plan	EPA Identification Points	Evidence
Monthly Environmental Inspections	PA07_0161 Sch 2, Condition 1	Monthly	Leading Hands undertake monthly inspections of each area as per Internal Environmental Checklist. Issues identified should be discussed in Regular Toolbox talks / Safety Meetings.	N/A	Environmental Checklist Records

5.3 ENVIRONMENTAL AUDITING

5.3.1 INDEPENDENT ENVIRONMENTAL AUDIT

DWAU is required to engage an Environmental Consultant to undertake an Independent Environmental Audit on in accordance with the condition 5 of Schedule 4 of consent 07-0161 MOD 4. The first independent environmental audit was conducted at the site in 2018 and the second in 2021. DWAU has to ensure the audits be conducted every 3 years.

The Managing Director shall commission an independent Environmental Audit of the project. Appointment of the independent auditor must be endorsed by the DPIE.

The audit must:

- Include consultation with EPA , Council and DPIE;
- Assess the environmental performance of the project and assess whether it's complying with the relevant requirements in the conditions approval and Environmental Protection License;
- Review the adequacy of strategies , plans or programs required under these approvals , and if appropriate;
- Recommend measures or actions to improve the environmental performance of the project, and/or any assessment plan or program.

The next audits are due in 2024 and 2027.

5.4 REVIEWS

5.4.1 Review Of Plans And Programs

The Compliance Officer shall be responsible for ensuring adequacy for the strategies, plans and programs following:

- The recommendations of an audit or corrective action;
- An environmental incident;
- Receipt of a community complaint; and or
- Instruction from regulatory authority.

In addition review of plans and strategies required under the Project Approval must be reviewed within 3 months of:

- An independent environmental audit;
- Annual review;
- Consent of any modification of the conditions of the project approval; and
- Issue of a direction of the Planning Secretary.

This review will enable a continual improvement process to ensure the continuing suitability, adequacy and effectiveness of the management plan and its implementation. Should the review identify that plans or strategies require revision, these must be revised to the satisfaction of the Secretary and submitted within 6 weeks of the review.

The Compliance Officer shall ensure the Product Management Plan is revised and reviewed every 5 years to the satisfaction of the DPIE.

5.4.2 Annual Review

The Compliance Officer is responsible for ensuring that a review of the environmental performance of the project occurs annually. The review must:

- Identify the standards and performance measures that apply to the project;
- Describe the works and operations carried out in the past year
- Describe the work and operations carried out in last year
- Include a summary of the complaints received during the past year , and compare this to complaints received in previous years;
- Analysis on the monitoring results and the complaints received against the:
- Relevant statutory requirements , limits or performance measures /criteria;
- Monitoring results from the previous years; and
- Predictions in the EA
- Identify any trends in the monitoring results over the life of the site;
- Identify any non-compliance during the previous year; and
- Describe what actions were, or are being, taken to ensure compliance.

The Annual Review is to be undertaken in accordance with the Annual Review Guideline (2015) and is due is due 60 calendar days after the end of each reporting period. The reporting period for DWAU is for the 12 months ending 1st November each year. The Annual Review shall be submitted to the DPIE and EPA.

5.4.3 Document Control

DWAU will ensure that all the EMS documentation is maintained, up to date and readily available to all authorized personnel. The following procedures ensure document control:

- Copies of the EMS document will be kept on-site;
- The document will be reviewed , and if necessary revised, if any changes occur;
- All the relevant authorities will be notified of revision to the EMS;
- The EMS will be clearly dated;
- All plans and strategies required under this EMS and the Project Approval will be maintained,
- All monitoring results will be retained for a minimum of 4 years in accordance with Condition M1 of the EPL

5.5 Pollution Studies & Reduction Programs

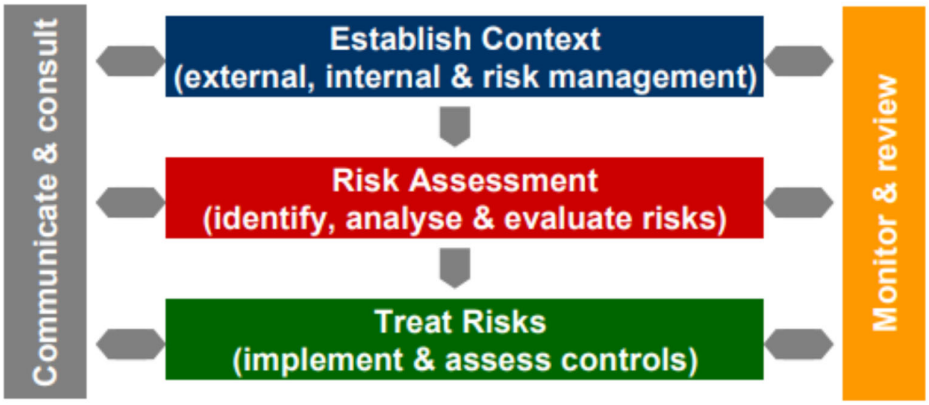
The EPL often contains pollution studies and reduction programs required to be completed by certain dates. These will be undertaken in consultation with qualified and experienced consultants to ensure that any programs or mitigation measures are adequately implemented.

6. RISK MANAGEMENT PROCESS

DWAU will utilize the Australian and New Zealand Risk Management Standard AS/NZS ISO 31000:2009 to manage risks. This is a structured and proactive approach that can be applied organization-wide to support management of strategic and/or operational risks.

Under this approach, there are five key stages to the risk management process.

1. Communicate and consult – with internal and external stakeholders
2. Establish context – the boundaries
3. Risk Assessment – identify , analyze and evaluate risks
4. Treat Risks - implement and assess controls to address risk
5. Monitoring and review – risk reviews and audit



Risk management approach using AS/NZS ISO 31000 Risk Management Standard

The environmental risk analysis for the site involves:

- Identifying environmental aspects
- Identifying the source of potential risks associated with each of these aspects
- Identifying the potential impact associated with each risk
- Evaluating the likelihood of occurrence and consequence of each risk
- Assigning a risk rating
- Identifying priority issues for the EA

The potential risks were given a ranking with regard to the likelihood of it occurring in accordance with the definitions provided below.

LIKELIHOOD	DESCRIPTION
Almost certain	Expected to occur in most circumstances
Likely	Will probably occur in most circumstances
Possible	Could occur
Unlikely	Could occur but not expected
Rare	Occurs only in exceptional circumstances

CONSEQUENCE	DEFINITION
Extreme	Irreparable/long-term damage/widespread environmental effects may include major pollution incident , unauthorized damage to significant cultural or heritage sites. Occurence may result in significant regulatory intervention
High	Serious damage to the environment, medium-long term impact, rehabilitation at considerable expense. Possible legal non-compliance and/or damage to corporate reputation.
Medium	Localised, short term damage/disturbance to the environment requiring relatively short-term remedial action (<1 month)
Low	Noticeable impact on natural environment /corporate reputation requiring little to no remedial action
Negligible	Negligible impact on the environment which is difficult to notice and does not require remedial action

Impact Priority Matrix

Likelihood Level	Negligible	Low	Medium	High	Extreme
Almost Certain	Medium	High	Extreme	Extreme	Extreme
Likely	Low	Medium	High	Extreme	Extreme
Possible	Negligible	Low	Medium	High	Extreme
Unlikely	Negligible	Negligible	Low	Medium	High
Rare	Negligible	Negligible	Negligible	Low	Medium

6.1 RISK ANALYSIS

Environmental Aspect	Source of Risk	Potential Impact	Mitigation Measures & Monitoring	Likelihood	Consequence	Risk Rating
Air Emissions	Stack emissions from Redry Kiln 1 and 2 Exhaust, 2.5MW Redry Boiler, 15MW Biomass Boiler and Vacuum Pump Exhaust.	Emissions of Nitrogen oxides, solid particles, volatile organic compounds, Type 1 and Type 2 substances, copper exceeding the EPL Limits	Air Emission Management Plan Regular monitoring of emissions from these sources is undertaken annual in accordance with the EPL. Recent monitoring results have confirmed compliance with EPL.	Unlikely	High	Medium
		Impacts on nearby sensitive receptors	Air assessment confirmed emissions would meet acceptable ground level concentrations. Air Emission Management Plan. Regular monitoring of emissions from these sources is undertaken annual in accordance with the EPL.	Unlikely	Medium	Low
	Wood Residue Stockpiles	Visible dust emissions causing health issues and/or nuisance to road users and sensitive receptors	Dust and Wood Residue Management and Monitoring Plan. Designated storage bunkers for wood residue Use of wood residue in biomass boilers and regular removal of excess wood residue from site minimises quantities of wood residue.	Unlikely	Medium	Low
	Dust emissions in the loading area behind residue storage bunkers and on the site's exit road.	Visible dust emissions can cause nuisance to sensitive receptors	Dust and Wood Residue Management and Monitoring Plan. Regular watering of ground surfaces using "dustex" Sweeping of the exit road by independent contractor.	Possible	Medium	Medium
Odour	Odour from the treatment plant, Redry building and GoS building.	Odour emissions impacting nearby sensitive receivers	Since the start of operations on the site, there has been no Odour issues or complaints.	Unlikely	Low	Negligible

Environmental Aspect	Source of Risk	Potential Impact	Mitigation Measures & Monitoring	Likelihood	Consequence	Risk Rating
Noise	Noise from site processes and handling operations	Excessive noise levels at sensitive receptors, exceedance of EPL noise limits	Regular noise monitoring as per EPL If noise monitoring indicates an exceedance to EPL limits, a noise assessment should be undertaken to determine the source of the noise and identify additional mitigation measures.	Likely	Medium	High
Waste	Area adjacent to Pond 2 contains items which require disposal.	Potential for these items of waste to contaminate water or land and generally create an untidy environment. Poor housekeeping.	Items need to be removed and/or recovered as a priority.	Possible	Medium	Medium
	Wood residue – bark, woodchip, saw dust and shavings	Generation of excessive waste resulting in potential contamination issues and/or wasted resources	The Dust and Wood Residue Management and Monitoring Plan identifies how wood residue is managed and options for reuse and/or recycling.	Rare	Low	Negligible
	Hazardous waste - CCA and Micro Pro drip pad waste	Incorrect management of hazardous wastes can result in health impacts and contamination to the environment.	The Product Management Plan identifies management strategies and disposal options for this waste.	Unlikely	Medium	Low
	Bifenthrin waste (H2F Treatement)	Incorrect management may result in health impacts and contamination to the environment.	The Product Management Plan identifies management strategies for this waste. Minor quantities are generated. Classification of this waste is needed.	Possible	Medium	Medium

Environmental Aspect	Source of Risk	Potential Impact	Mitigation Measures & Monitoring	Likelihood	Consequence	Risk Rating
	General waste – reject treated timber & Boiler Ash	Incorrect management may result in health impacts and contamination to the environment.	The Product Management Plan identifies management strategies for this waste. Further investigation into potential reuse/recycling options for boiler ash is recommended.	Unlikely	Medium	Low
	Wastewater	Release of wastewater resulting in contamination of waterways and land	All wastewater generated on site is treated prior to reuse	Unlikely	Medium	Low
Chemical usage and storage	Treatment Plant Bulk Chemicals	If there is a spillage issue or incident, then it can be hazardous to both health and environment.	Treatment plant has a bunded concrete area to reduce the risk of chemical contamination of soil and groundwater. A dedicated forklift is assigned for treatment plant to ensure that contaminated materials and chemicals are kept within sealed and Bunded areas.	Unlikely	Low	Low
	Diesel tank	f there is a spillage issue or incident, then it can be hazardous to both health and environment.	Diesel tank is self bunded	Unlikely	Low	Low
	H2F System (Bifenthrin)	f there is a spillage issue or incident, then it can be hazardous to both health and environment.	Bunded spray unit, enclosed booth	Unlikely	Low	Low
Transport	Movement of heavy vehicles during operation	Increase in traffic as a result of operation impacting safety and traffic along the local road network.	Restricted hours for truck movements 06:00 to 16:30) Transport movements managed at the weighbridge office.	Unlikely	Medium	Low

Environmental Aspect	Source of Risk	Potential Impact	Mitigation Measures & Monitoring	Likelihood	Consequence	Risk Rating
Soil & Groundwater	There is contaminated soil present in the vicinity of the CCA treatment facility.	Hazardous to the site and also to health, safety and environment.	Remedial Action Plan Soil and Water Management Plan Ongoing soil monitoring undertaken by an independent contractor. Remediation of this area is needed as a priority.	Likely	Medium	High
	Treated timber and/or chemical spill, release	Contamination within soils and groundwater migrating off site	Bunded chemical storage areas Procedures in place for management of treated timber process	Unlikely	Medium	Low
Surface Water	Management of surface water on site within ponds	Potential overflow to off-site waterways	Reuse of pond water in on site processes Pond system on site designed to be self contained and does not overflow to off site waterways Soil and Water Management Plan Regular Surface Water Monitoring	Unlikely	Medium	Low

APPENDICES

Appendix 1: Environmental Policy Statement

Dongwha

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ENVIRONMENTAL POLICY STATEMENT

OUR COMMITMENT

Dongwha Australia acknowledges that aspects of its activities can have significant impact on our environment. It is our objective to balance business and environment both locally and globally. As a company we are committed to conduct all activities in a manner that will seek to ensure prevention of pollution.

Accordingly, the company will seek to achieve and maintain compliance to all existing and future environmental legislation, and all other requirements to which the company subscribes.

OUR STRATEGY

To deliver on our commitment, Dongwha Australia will endeavour to:

- Communicate its environmental policies and procedures to all employees and others where appropriate
- Comply with all relevant environmental laws, regulations, statutory obligations and relevant codes of practice.
- Develop and maintain environmental management systems that integrate environmental management in all aspects of our business activities.
- Make business actions that work toward achieving sustainable development.
- Ensure our employees, subcontractors, suppliers and consultants are aware of and have required skills to fulfil their environmental obligations with respect to Dongwha Australia's operations.
- Aim to conserve resources, reduce waste and eliminate or minimise adverse environmental effect and risks that may be associated with our services and operations.
- Work with our clients and stakeholders to assist them achieve their environmental objectives and obligations.
- Periodically review environmental policies and procedures to maintain their relevance.

Iljun Son (Jack) | General Manager

09/08/2018

Appendix 2: Legal Register

Attachment A1: Legal and Other Requirements

Table A1-1: Register of legal and other requirements

Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
Environmental Planning and Assessment Act 1979	All	S4.2	Comply with Project Approval PA07_0161 (MOD4) conditions from DPIE.	Conditions of the Project Approval that are required to be addressed in this EMS are detailed in **Error! Reference source not found.** below.
Protection of the Environment Operations Act 1997	Environment Protection Licences	48	Clause 48 *Licensing requirement – scheduled activities (premises based)* (1) *This section applies to scheduled activities where Schedule 1 indicates that a licence is required for premises at which the activity is carried on.*	EPL 11205 authorises the carrying out of wood or timber milling processing and wood preservation activities at the site. Conditions of the EPL are addressed in this EMS in Table A1-4.

Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
	Environmental Harm	S115 S116 S117	The principal objective of the legislation is to avoid causing environmental harm. Harm is defined in the Act as being: ***"harm"**, in relation to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above includes any act or omission that results in pollution.* ***"Pollution"** means:* *(a) water pollution, or* *(b) air pollution, or* *(c) noise pollution, or* *(d) land pollution.* Clause 115 relates to the offence for wilful or negligent disposal of waste likely to harm the environment. Clause 116 relates to offences for wilful or negligent causing leaks, spills or escapes of substances likely to harm the environment. Clause 117 relates to offences for wilful or negligent emission of ozone depleting substances likely to harm the environment.	The implementation of the EMS would ensure that the environmental impacts of the activities taking place on site are minimised. Safeguards, Management & Monitoring Plans and procedures would ensure that site operations avoid causing environmental harm or pollution.
	Water Pollution	S120 S123	Clause 120 relates to the prohibition of pollution of waters: *A person who pollutes any waters is guilty of an offence.* Clause 123 details the maximum penalty for water pollution offences. Tier 2 penalties apply. *A person who is guilty of an offence under this Part is liable, on conviction.*	Applies. Responsibility extends to all employees. Implementing the SWMP will address this clause.

Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
	Air Pollution and Odour	Part 5.4	Clause 124 relates to the operation of plant (other than domestic plant): *The occupier of any premises who operates any plant in or on those premises in such a manner as to cause air pollution from those premises is guilty of an offence if the air pollution so caused, or any part of the air pollution so caused, is caused by the occupier's failure:* *(a) to maintain the plant in an efficient condition, or* *(b) to operate the plant in a proper and efficient manner.* Clause 125 relates to maintenance work on plant. Clause 126 relates to dealing with materials. Clause 128 relates to standards of air impurities not to be exceeded. Clause 129 relates to the emission of odours from licensed premises. Clause 132 details the maximum penalty for air pollution offences. Tier 2 penalties apply. *A person who is guilty of an offence under this Division is liable, on conviction*	Potential for air pollution to occur is associated with stack emission points. An Air Emissions Management Plan addresses potential air pollution issues Responsibility extends to all employees. If found guilty of an air pollution offence, both the company and the individual can be held liable.

Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
	Noise Pollution	S139 S140 S141	Clause 139 relates to the operation of plant: *The occupier of any premises who operates any plant (other than control equipment) at those premises in such a manner as to cause the emission of noise from those premises is guilty of an offence of the noise so caused, or any part of it, is caused by the occupier's failure:* *(a) To maintain the plant in an efficient condition, or* *(b) To operate the plant in a proper and efficient manner.* Clause 140 relates to dealing with materials: *The occupier of any premises who deals with materials in or on premises in such a manner as to cause the emission of noise from those premises is guilty of an offence if the noise so caused, or any part of it, is caused by the occupier's failure to deal with those materials in a proper and efficient manner.* Clause 141 details the maximum penalty for noise offences. Tier 2 offences apply. *A person who is guilty of an offence under this Part is liable, on conviction.*	Noise Limits apply to site operations. Noise Monitoring is a requirement of the Project Approval and EPL.
	Land Pollution	S142A	Clause 142A relates to the pollution of land. Tier 2 penalties apply. *A person who pollutes land is guilty of an offence.*	Applies. Relevant plans include: Product Management Plan, Dust and Wood Residue Management and Monitoring Plan.

Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
	Waste	S143 S144 S145	Waste needs to be disposed of in a manner which does not create or is likely to create environmental harm. Clause 143 relates to the unlawful transporting or depositing of waste: *If a person transports waste to a place that cannot lawfully be used as a waste facility for that waste, or causes or permits waste to be so transported:* *(a) the person, and* *(b) if the person is not the owner of the waste, the owner,* *are each guilty of an offence.* Clause 144 deals with the use of land as waste facility without lawful authority: (*1) A person who is the owner or occupier of any land and who uses the land, or causes or permits the land to be used, as a waste facility without lawful authority is guilty of an offence.* *(2) In any proceedings for an offence under this section the defendant bears the onus of proving that there is lawful authority to use the land concerned as a waste facility.* *All waste must be classified in accordance with the EPA's Waste Classification Guidelines.*	The generation of waste requires appropriate management. Any waste disposal required must be undertaken in accordance with the NSW EPA's *Waste Classification Guidelines*. The Product Management Plan identifies all the waste expected to be generated by the site activities and outlines its respective classification and management (i.e. recycled, disposed, etc.) All waste should be stored in an environmentally safe manner. False or misleading information regarding pollution incidents is an offence under the Act.

Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
	Duty to notify pollution incidents	S148	Clause 148 *Pollution incidents causing or threatening material harm to be notified.* • *Kinds of incidents to be notified* *This Part applies where a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened.* • *Duty of person carrying on activity to notify* *A person carrying on the activity must, immediately after the person becomes aware of the incident, notify each relevant authority of the incident and all relevant information about it.*	In the event of an incident, the duty to notify extends to all staff and contractors of the site. Staff and/or contractors are required to notify the employer. When management is not contactable, they are required to notify the relevant authorities.
	Duty to prepare and implement pollution incident response management plans	S153A	Clause 153A *Duty of Licence holder to prepare pollution incident response management plan* *The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.*	Applies. DWAU have a Pollution Incident Response Management Plan.
	Control equipment	S167	Clause 167 relates to the responsibility of the occupier of any premises to maintain and operate any control equipment installed at the premises in a proper and efficient manner.	Applies.

Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
Protection of the Environment Operations (Clean Air) Regulation 2010	Standards for Schedule Premises	Division 2	Clause 32 *General grouping of activities and plant.* In general: Group 4 apply to activity or plant that commenced after 1 July 1986 and before 1 August 1997. Group 5 apply to activity or plant that commenced after 1 August 1997 and before 1 September 2005. Group 6 apply to activity or plant that commenced after 1 September 2005.	Group 6 standards area of relevance to the new plant.
	Standards of concentration for Scheduled Premises: general activities and plant	Sch 4	General standards of concentration	The following group 6 standards of concentration apply: Solid particles (total): 50mg/m^3 NOx as NO2: 500 mg/m^3 Dioxins and furans: 0.1 Ng/m^3 Type 1 and 2 substances in Aggregate: 1 mg/m^3 Total Volatile Organic Compounds, as n-propane: 40 mg/m^3
Protection of the Environment Operations (Waste) Regulation 2014	Waste and transport	Part 4 Part 5	Part 4 relates to the tracking of certain waste transported within, out of and into NSW. Part 5 relates to reporting on transportation of waste from NSW to an interstate waste facility if the waste has been generated in the metropolitan levy area.	Tracking requirements apply to CCA and Micro Pro drip pad waste (waste code: H170)

Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
Water Management Act 2000	Water access licence	S56 S60A S89 S91A	A licence may be required in the relevant water sharing plan area for the right to share available water from a particular water source. Water cannot be taken from a waterbody without a licence.	Does not apply
	Water management works	S90 S91B S91C S91D	Approval is required for construction and/or use of a water supply work, drainage work or flood work.	Does not apply
	Waterfront land	S91	A controlled activity approval is required for works on or under waterfront land.	Does not apply
Water Act 1912 Applies to water sources in NSW where water sharing plans have not commenced.	Surface water	S10	A licence or permit may be required for the taking and using of water from a stream or river, capture of water in a farm dam.	Does not apply
	Groundwater	S112	A licence may be required for extraction of groundwater.	Applies to boreholes
Work Health and Safety Regulation, 2017	Labelling of hazardous chemicals	S341	Hazardous chemical used, handled or stored at the workplace must be correctly labelled in accordance with clause 335. Schedule 9, Part 3 of the Regulation sets out requirements for labelling.	All hazardous chemicals on site must be correctly labelled. The Safety Management System addresses workplace hazardous chemicals.
	Hazardous chemicals register	S346	A register of hazardous chemicals used, handled and stored at the site needs to be prepared and maintained and include the current safety data sheets for each hazardous chemical listed.	Safety Management System
	Manifest of hazardous chemicals	S347	If quantities of hazardous chemicals exceed manifest quantities in Schedule 11, a manifest of hazardous chemicals must be prepared. The manifest must comply with Schedule 12 of the regulation.	Applies. Treatment plant chemicals exceed thresholds therefore a manifest is required.

Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
	Manifest Quantities	S348	Notification to SafeWork is required if manifest quantities in Schedule 11 are exceeded.	Notification of hazardous chemicals to SafeWork is required.
	Placarding Requirements	S349 S350	Outer warning placards are to be displayed if the placard quantity in Schedule 11 is exceeded. A placard must comply with Schedule 13.	Placarding is required.
	Emergency Plans and Safety Equipment	S359 S360 S361 S362	Fire protection and firefighting equipment designed for the types of hazardous chemicals used and stored at the site must be installed, tested and maintained. Equipment must be available for use in an emergency.	Safety Management System contains emergency procedures.
Dangerous Goods (Road and Rail Transport) Act 2008	Transport of dangerous goods	S9	Clause 9 requires transport of dangerous goods by road or rail to be in a safe manner.	Applies
Waste Avoidance and Resource Recovery Act, 2001	Waste Strategy	S12	Promotes waste avoidance and resource recovery and provides for a state-wide Waste Strategy to achieve a continual reduction in waste generation. The NSW Waste Avoidance and Resource Recovery Strategy 2014-21 provides the framework for waste management until 2021.	Product Management Plan
Contaminated Land Management Act 1997	Reporting contamination	S60	Clause 60 relates to the duty of a person undertaking activities that have contaminated land and the land owner to report contamination.	Applies. Remediation Action Plan
Noxious Weeds Act 1993	Weed control & reporting	S12 S15	Clause 12 relates to private occupiers of land responsibility to control noxious weeds on land. Clause 15 requires occupiers of land to notify local control authority of notifiable weeds.	Applies. Landscape Management Plan

Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
Biodiversity Conservation Act 2016 No 63	Protection of animals and plants	Part 2	Clause 2.1 relates to offences for harming animals that are a threatened species, part of a threatened ecological community or a protected animal. Clause 2.2 relates to offences for picking plants. Clause 2.3 and 2.4 relate to offences for damaging areas of outstanding biodiversity and habitat of threatened species or ecological community.	Applies
	Clearing of native vegetation	S2.11	A biodiversity conservation licence is required for clearing of native vegetation	Does not apply
Environment Protection and Biodiversity Conservation Act 1999 (Cth)	Flora and fauna conservation	Part 13	A permit is required for activities that will affect listed species and ecological communities within a commonwealth area.	Does not apply
Heritage Act 1977	Heritage	S57 S139 S146	Clause 57 requires approval for work to any item to which an interim heritage order or listing on the state heritage register applies. Clause 139 requires that an excavation permit is required to disturb any land knowing or having reasonable cause to suspect disturbance may uncover a relic. Clause 146 requires that discovery of a relic must be notified to the Heritage Council.	Applies
Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)	Protection of places and objects	S20 S22	Clause 20 relates to reporting of any discovery of Aboriginal remains to the Minister. Clause 22 requires compliance with the provisions of any declaration in relation to a significant Aboriginal area or object.	Aboriginal Cultural Heritage Management Plan
National Greenhouse and Energy Reporting Act 2007 and Regulations 2008	Greenhouse Gas emissions	S13	Requirement for the accounting and reporting of greenhouse gases emitted and energy consumed or produced during a financial year if the facility meets the thresholds in Clause 13.	Applies

Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
Fisheries Management Act 1994	Permits	S144 S201 S205 S219	Clause 144: Aquaculture permit Clause 201: Permit to carry out dredging or reclamation work Clause 205: Permit to cut, remove, damage or destroy marine vegetation on public water land or an aquaculture lease, or on the foreshore of any such land or lease. Clause 219: Permit to: (a) set a net, netting or other material, or (b) construct or alter a dam, floodgate, causeway or weir, or (c) otherwise create an obstruction, across or within a bay, inlet, river or creek, or across or around a flat	Does not apply.

Table A1-2: Licences, Approvals and Permits

Type	Relevant Legislation	Required?	Agency
LICENCES			
Environment Protection Licence	Schedule 1 of the Protection of the Environment Operations Act 1997	**YES**	NSW EPA
Surface Water Licence	Water Act 1912	No	Office of Water
Groundwater Licence	Water Act 1912	No	Office of Water
Water Access Licence	Water Management Act 2000	No	Office of Water
PERMITS			
Permits under the Fisheries Management Act	Fisheries Management Act 1994	No	DPI Fishing and Aquaculture
Aboriginal Heritage Impact Permit	National Parks & Wildlife Act 1974	No	OEH
Permits under the Heritage Act 1977	Heritage Act 1977	No	OEH
APPROVALS			
Project Approval	Environmental Planning and Assessment Act 1979	**YES**	Department of Planning, Industry & Environment
Alter or erect improvements within a mine subsidence district	Mine Subsidence Compensation Act 1961	No	Mine Subsidence Board
Consent for works and structures in a public road	Roads Act 1993	No	RMS
Sub-division or development of bush fire prone land	Rural Fires Act 1997	No	Commissioner of the NSW Rural Fire Service

Table A1-3: Project Approval 07_0161 (MOD4) Conditions relevant to Environmental Management

Condition	Requirement	EMS Section / Plan
Schedule 3 – Specific Environmental Conditions		
AIR QUALITY		
1	The Applicant must not cause or permit the emission of offensive odours from the site as defined under Section 129 of the POEO Act.	AEMP
Dust		
2	The Applicant must implement all reasonable and feasible measures to minimise dust generated by the development (this must include ensuring that all trucks carrying woodchips or wood residue have their loads covered).	AEMP DWRMMP

Table A1-3: Project Approval 07_0161 (MOD4) Conditions relevant to Environmental Management

Condition	Requirement	EMS Section / Plan
4	The Applicant must prepare and implement a Dust and Wood Residue Monitoring and Management Plan to the satisfaction of the Planning Secretary. The plan must: (a) be revised in consultation with EPA and approved by the Planning Secretary prior to the commencement of operation of the 15MW wood fired boiler; (b) provide a detailed program for management of the existing wood residue stockpile: i. describing how the stockpile would be monitored and managed; ii. describing the disposal options and progress achieved to date; iii. setting out the disposal strategy to be implemented, with detailed staging, linking to the stages of the mill expansion, and timing for complete removal of the stockpile; iv. outlining the contingency measures that would be implemented should the management of the stockpile prove insufficient, or the disposal strategy be delayed (c) quantify the volumes of wood residue to be produced once operating at full capacity; (d) demonstrate that these volumes can be appropriately stored and disposed; (e) provide a monitoring strategy to identify: i. any potential or actual failings in the management of dust and wood residue; ii. when excess wood residue is being produced and when milling is required to cease to avoid exceeding the capacity of the storage area; and (f) outline the contingency measures that would be implemented should: i. the management measures prove insufficient; ii. the disposal options change; or iii. the wood residue produced exceed the storage capacity on site.	DWRMMP
Emission Limits		
5	Unless otherwise specified by the Planning Secretary, the Applicant must: a) Undertake air emissions monitoring in accordance with the EPL(s) for the site; and b) Ensure that emissions for the development do not exceed the emissions limits specified by the EPA in the EPL(s) for the site.	AEMP
Boiler Fuel		
5C	The Proponent shall ensure only unused and uncontaminated wood material is utilised within the 15 MW Wood-fired Boiler and 2.5 MW Wood-fired Boiler.	DWRMMP
5D	The Proponent shall ensure Copper Chrome Arsenate treated timber is not utilised within the 15 MW Wood-fired and 2.5 MW Wood-fired Boiler.	DWRMMP
5E	The Proponent shall ensure they conduct fuel quality testing of the timber to be utilised within the 15MW Wood-Fired Boiler and 2.5MW Wood-Fired Boiler.	DWRMMP

Table A1-3: Project Approval 07_0161 (MOD4) Conditions relevant to Environmental Management

<table>
<tr><th>Condition</th><th>Requirement</th><th>EMS Section / Plan</th></tr>
<tr><td colspan="3">Air Emissions Management Plans</td></tr>
<tr><td>6</td><td>The Applicant must prepare and implement an Air Emissions Management Plan to the satisfaction of the Director-General. This plan must:
(a) be prepared in consultation with the EPA and approved by the Director-General prior to operation of the new: dry mill or treatment plant or green mill or boiler/s or kiln or steamer/s or vacuum pump or wastewater tank flue (as described in the EA and 07_0161 MOD 1);
(b) be updated prior to the operation of the 15 MW Wood-fired Boiler, to the satisfaction of the Planning Secretary and the EPA;
(c) be prepared in accordance with the requirements of the “Approved methods for the sampling and analysis of air pollutants in NSW”;
(d) identify the air emission limits for the development;
(e) demonstrate that the ground level concentration would comply with the requirements of the “Approved methods for the modelling and assessment of air pollutants in New South Wales”;
(f) describe the treatments, controls and operational practices to be implemented to manage air emissions, demonstrating best practice process design and emission control;
(g) include a program for the ongoing monitoring and reporting of air emissions from the development, describing the location, frequency, method and pollutants to be monitored; and
(h) outline the contingency measures that would be implemented should any air emission limits be exceeded</td><td>AEMP</td></tr>
<tr><td colspan="3">Meteorological Monitoring</td></tr>
<tr><td>7</td><td>During the life of the development, the Applicant must ensure that there is a suitable meteorological station in the vicinity of the site that complies with the requirements in the latest version of Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales guidelines.</td><td>AEMP
Table 5-1</td></tr>
<tr><td colspan="3">Construction and Operation Hours</td></tr>
<tr><td>8</td><td>The Applicant must comply with the construction and operation hours in Table 2.
Table 2: Construction and Operation Hours
<table>
<tr><th>Activity</th><th>Day</th><th>Time</th></tr>
<tr><td rowspan="3">Construction and Demolition</td><td>Monday – Friday</td><td>7am to 6pm</td></tr>
<tr><td>Saturday</td><td>8am to 1pm</td></tr>
<tr><td>Sunday and Public Holidays</td><td>Nil</td></tr>
<tr><td>Operations – Log Yard, Green Mill and Product Dispatch</td><td>Monday - Saturday</td><td>6am to 10pm</td></tr>
<tr><td>All other Operations</td><td>All Days</td><td>All Hours</td></tr>
</table>
Notes:
• Construction and demolition activities may be conducted outside the hours in Table 2 provided that the activities ar not audible at any residence beyond the boundary of the site; and
• Emergency work to avoid the loss of life, property and/or prevent environmental harm may be undertaken outsid the hours in Table 2.</td><td>Section 1.1.2</td></tr>
<tr><td>9</td><td>The Applicant must ensure that noise generated by the development does not exceed the noise limits presented in Table 3 or Table 4.
Table 3: Operation Noise Limits (dB(A))
<table>
<tr><th rowspan="2">Location</th><th>Day</th><th>Evening</th><th colspan="2">Night</th></tr>
<tr><th>$L_{Aeq\ 15\ min}$</th><th>$L_{Aeq15\ min}$</th><th>$L_{Aeq15\ min}$</th><th>L_{Amax}</th></tr>
<tr><td>Any Residence</td><td>35</td><td>35</td><td>35</td><td>45</td></tr>
</table>
Table 4: Construction Noise Limits (dB(A))
<table>
<tr><th rowspan="2">Location</th><th>Day</th></tr>
<tr><th>$L_{Aeq\ 5\ min}$</th></tr>
<tr><td>Wedmore Road, west</td><td>45</td></tr>
<tr><td>Any Other Residence</td><td>40</td></tr>
</table>
Notes – Unless otherwise specified in the EPL:
· Noise emission limits apply under all meteorological conditions except for any of the following:
a) wind speeds greater than 3 m/s at 10 metres above ground level; or
b) stability category G temperature inversions conditions; or
c) stability category F temperature inversions conditions and wind speeds greater than 2 m/s at 10 m above ground level.
· To determine compliance with this condition, noise from the development must be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary and within 1 m of a dwelling façade, to determine L_{Amax} noise limits.
· However, where it can be demonstrated that direct measurement of noise from the development is impractical, the EPA may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.</td><td>Table 5-1</td></tr>
</table>

Table A1-3: Project Approval 07_0161 (MOD4) Conditions relevant to Environmental Management

Condition	Requirement	EMS Section / Plan
NOISE		
Noise Validation Report		
11	The Applicant must prepare Noise Validation Reports, to the satisfaction of the Director-General. The reports must: (a) be undertaken: i. within 3 months of the commencement of construction, while working under normal construction and operational conditions (ie it is expected that the mill will still be operating during most stages of construction and the cumulative noise levels of all works on site must be measured); ii. within 3 months of the completion of all building works as described in the EA and 07_0161 MOD 1 or a time otherwise agreed to by the Director-General, while operating under normal conditions; and iii. within three months of the commencement of operation of the 15 MW Wood-fired Boiler, whilst operating; and iv. under normal conditions; following the receipt of a complaint, if requested by the Planning Secretary; (b) be submitted to EPA and the Director-General within 1 month of each time identified in (a) above; (c) validate the predictions made in the EA; (d) demonstrate compliance with the limits in this consent; (e) demonstrate the noise controls are working effectively; and, (f) if any non-compliances are detected, describe the measures that are to be implemented and the timing for implementation of these measures, to ensure compliance.	Table 5-1
SOIL, SURFACE AND GROUND WATER		
Remediation		
12	The Applicant must provide and implement a Remedial Action Plan for the site to the satisfaction of the Director-General. The plan must: (a) be reviewed and endorsed by a suitably qualified independent expert (to be approved by EPA) and approved by the Director-General, prior to the commencement of any earth or building works on Zone 3; (b) identify the nature and extent of all contamination on the existing mill site (Lot 27 DP1061792), including any offsite impacts (for example on groundwater); (c) justify the remediation criteria for the site; (d) consider options for the remediation of each component of the contamination; (e) justify the remediation strategy proposed; (f) set out the timing and staging of all remediation works to be undertaken; (g) include a site validation plan; and (h) demonstrate compliance with the *Contaminated Land Management Act 1997*.	RAP
13	Prior to the commencement of building works on contaminated areas of Zone 3 (as described in the Remedial Action Plan required by Condition 12 of this Schedule), the Applicant must provide a Validation Report and Site Audit Report and Statement covering the areas of the site which have been remediated. The: (a) the Validation Report and Site Audit Report and Statement must be provided to the Department, EPA and Council, certifying the appropriateness of the validation report; and the (b) Validation Report must also: i. be prepared in accordance with the guidelines made or approved by the EPA under section 105 of the *Contaminated Land Management Act 1997*; ii. be subject to a Site Audit in accordance with the *Contaminated Land Management Act 1997* to confirm the appropriateness of the Validation Report; and iii. include the results of surface and groundwater monitoring.	To be provided upon completion

Table A1-3: Project Approval 07_0161 (MOD4) Conditions relevant to Environmental Management

Condition	Requirement	EMS Section / Plan
Water Pollution		
15	The Applicant must not cause or permit any waters to be polluted, as defined under Section 120 of the POEO Act	SWMP
Bunding		
16	All chemicals must be stored in: (a) appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% (or 120%, where required by the Australian Standards) of the largest container stored within the bund.	Safety Management System
17	The Applicant must implement suitable measures to ensure: the integrity of the bunds is maintained, and to prevent and manage spills on site. These measures must include: (a) an inventory system to accurately measure and report on production losses; (b) an early warning leak detection and prevention system, certified by an accredited site auditor; (c) a bund, tank and pipeline integrity assessment program; and (d) a spill prevention and management system, including: i. a Spill Response and Prevention Plan; ii. a Monitoring Program; and iii. staff training.	Pollution Incident Response Management Plan
18	From the commencement of operations of the new treatment plant onwards, the Applicant must ensure that: (a) all treated timber is managed in accordance with Australian Standard *AS/NZS 2843.1:2006 Timber preservation plants – Timber preservation plant site design*, or its latest version; and (b) all treated timber undergoing CCA-fixation is stored on an impermeable surface and any runoff collected from these areas is separated from runoff that is not contaminated with CCA.	CCA Treated Timber Testing Procedure for Fixation using the Aquaspex Chromate Test Kit.
Fill		
19	Any fill material brought to site must be Virgin Excavated Natural Material or material subject to a Resource Recovery Exemption that is permitted to be used as a fill material, in accordance with the provisions of the *Protection of the Environment (Waste) Regulation 2005*. *Note: Any fill material subject to a Resource Recovery Exemption received at the site must be accompanied by documentation demonstrating that material's compliance with the conditions of the exemption, and this documentation must be provided to the Department, Council or the Principle Certifying Authority on request.*	Not relevant unless fill to be brought onto site.
Management		
20	The Applicant must prepare and implement a Soil and Water Management Plan for the development to the satisfaction of the Director-General. This plan must: (a) be approved by the Director-General prior to the commencement of any works on site; (b) be prepared in consultation with Council and EPA (including the Office of Water); (c) include : i. a Site Water Balance; ii. a Sediment and Erosion Control Plan; iii. a Stormwater Management Scheme; and iv. a Soil and Water Monitoring Program.	SWMP
21-25	*Includes requirements for i to iv of condition 20 above*	SWMP

Table A1-3: Project Approval 07_0161 (MOD4) Conditions relevant to Environmental Management

Condition	Requirement	EMS Section / Plan
WASTE		
26	The Applicant must ensure ash from the 15 MW Wood-fired Boiler and 2.5 MW Wood-fired Boiler is stored temporarily on-site for no more than three months in a dedicated concrete bunker. If the ash cannot be re-used or recycled, the Applicant must classify the waste in accordance with the EPA's *Waste Classification Guidelines* and dispose of to a facility that may lawfully accept the waste.	PMP
27	The Applicant must prepare and implement a Product Management Plan, to the satisfaction of the Planning Secretary. The Plan must: (a) be prepared in consultation with the EPA and approved by the Planning Secretary within 12 months of the consent of MOD 2; (b) identify the types and sources of materials and resources used in the production process, including a procurement plan demonstrating that options to reuse and recycle materials, (particularly waste products) are maximised; (c) identify potential environmental impacts and liabilities at each stage of the products life cycle; (d) detail the measure to be implemented to improve the design and reduce the liabilities identified in (c) above, including: • the material intensity of the product; and • hazardous materials contained in the product; (e) describe, classify and quantify the waste produced in the production process and include measures to maximise the reduction, reuse and recycling of this waste; (f) describe how the effectiveness of the plan would be monitored and reported; and (g) be revised and updated every 5 years to the satisfaction of the Director-General.	PMP
Statutory Requirements		
29A	All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	PMP
29B	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's *Waste Classification Guidelines Part 1: Classifying Waste* (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.	PMP
29C	Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing or disposal.	No waste received on site
29D	The Applicant must retain all sampling and waste classification data for the life of the development in accordance with the requirements of EPA.	PMP
ENERGY		
32	The Applicant must ensure the development is energy and water efficient, in accordance with industry best practice, to the satisfaction of the Director-General.	SWMP EEP

Table A1-3: Project Approval 07_0161 (MOD4) Conditions relevant to Environmental Management

Condition	Requirement	EMS Section / Plan
33	The Applicant must prepare and implement an Energy Efficiency Plan for the development, to the satisfaction of the Director-General. The program must: (a) be approved by the Director-General prior to the commencement of operation of the new: dry mill or treatment plant or green mill or boiler/s or kiln or steamer/s or vacuum pump or wastewater tank flue (as described in the EA and 07_0161 MOD 1); (b) investigate options to reduce the energy consumption of the development, including the use of solar kilns; (c) describe the energy efficiency measures that would be implemented onsite, quantify the savings made and demonstrating the use of best available technology; (d) demonstrate all reasonable and feasible measures to minimise greenhouse gas emissions would be implemented; and (e) include a program to monitor and report on the effectiveness of the measures implemented and a protocol for periodic review of the plan to ensure the development would continue to operate efficiently.	EEP
HERITAGE		
Aboriginal Cultural Heritage Management Plan		
34	The Applicant must prepare and implement an Aboriginal Cultural Heritage Management Plan for the development to the satisfaction of the Director-General. This plan must: (a) be prepared by a suitably experienced and accredited Aboriginal Heritage Consultant; (b) be prepared in consultation with EPA and the Aboriginal community, and be approved by the Director-General prior to the commencement of any works onsite; (c) describe the survey findings and identify all known artefacts onsite; (d) describe the procedures to be implemented: i. to salvage excavate, or record any artefacts on site; ii. to ensure appropriate Aboriginal groups are given the opportunity to be present on site during all earthworks; and iii. should additional artefacts or human remains be uncovered onsite.	ACHMP
Historical Heritage		
35	The Applicant must ensure that the Wool Pack Inn and Well are: (a) fenced in accordance with the recommendations in the EA, prior to the commencement of construction; and (b) protected for the life of the development.	ACHMP
VISUAL IMPACT		
Landscaping		
37	The Applicant must prepare and implement a landscape management plan for the development. The plan must: (a) be prepared in consultation with Council and approved by the Director-General prior to the commencement of building works on Zone 3; (b) illustrate the location, species and mature heights of plants to be established on site; (c) illustrate how the landscaping would minimise views of the site; (d) use endemic species only in the landscaping, ensuring seed and propagule sources are from local botanical provenance; (e) provide a timetable for the implementation of the plan; and (f) provide for the maintenance of the landscaping.	LMP

Table A1-3: Project Approval 07_0161 (MOD4) Conditions relevant to Environmental Management

Condition	Requirement	EMS Section / Plan
38A	Within 12 months of the consent of MOD 2, the Landscape Management Plan (required under Condition 38 and approved on 10 February 2012) must be updated to the satisfaction of the Planning Secretary in consultation with the EPA. The updated plan must include: a) measures to ensure that the final landform of the Rear Stockpile(s) area is free draining; b) details on the revegetation of the Rear Stockpile area with native species and its integration into the surrounding landscape, c) measures that would be put in place to ensure sufficient resources are available to implement the proposed rehabilitation measures, and the ongoing management of the vegetation following the complete removal of the Rear Stockpile(s); and d) timing of the implementation of the above works including a maintenance schedule.	LMP
Schedule 4 – Environmental Management, Monitoring, Auditing and Reporting		
ENVIRONMENTAL MANAGEMENT STRATEGY		
1	The Applicant must prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Director-General. This strategy must: (a) be submitted within 2 months of the date of this consent and approved by the Director-General prior to carrying out any construction; (b) be revised and approved by the Director-General, prior to the commencement of operations of ~~each~~ the new: dry mill or treatment plant or green mill or boiler/s or kiln or steamer/s or vacuum pump or wastewater tank flue (as described in the EA and 07_0161 MOD 1); (c) provide the strategic context for environmental management of the development; (d) identify the statutory requirements that apply to the development; (e) describe in general how the environmental performance of the development would be monitored and managed; (f) describe the procedures that would be implemented to: • keep the local community and relevant agencies informed about the operation and environmental performance of the development; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the development; • respond to any non-compliance; • manage cumulative impacts; and • respond to emergencies; and (g) describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the development	This document

Table A1-3: Project Approval 07_0161 (MOD4) Conditions relevant to Environmental Management

Condition	Requirement	EMS Section / Plan
ANNUAL REVIEW		
2	Within 12 months after the commencement of bulk earthworks in Zone 1, and annually thereafter, the Applicant must submit a review of the environmental performance of the development to the Director-General and relevant agencies. This report must: (a) identify the standards and performance measures that apply to the development; (b) describe the works and operations carried out in the past year; (c) describe the works and operations that will be carried out in the next year; (d) include a summary on the monthly production levels over the year; (e) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years; (f) analyse the monitoring results and the complaints received against the: • relevant statutory requirements, limits or performance measures/criteria; • monitoring results from previous years; and • predictions in the EA; (g) identify any trends in the monitoring results over the life of the development; (h) identify any non-compliance during the previous year; and (i) describe what actions were, or are being, taken to ensure compliance	Section 5.4.2
REVISION OF PLANS AND PROGRAMS		
3	Within 3 months of: a) the submission of an independent Audit under Condition 5 of Schedule 4; b) the submission of an incident report under condition 4 of schedule 4 c) the submission of an Annual Review under condition 2 of schedule 4; d) the consent of any modification of the conditions of this consent; or e) the issue of a direction of the Planning Secretary under condition 4 schedule 2 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Department must be notified in writing that a review is being carried out.	Section 5.4.1
3A	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for consent within six weeks of the review. Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.	Section 5.4.1
INCIDENT REPORTING		
4	The Applicant must notify the Director-General and any other relevant agencies of any incident associated with the development as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant must provide the Director-General and any relevant agencies with a detailed report on the incident.	PIRMP

Table A1-3: Project Approval 07_0161 (MOD4) Conditions relevant to Environmental Management

Condition	Requirement	EMS Section / Plan
INDEPENDENT ENVIRONMENTAL AUDIT		
5	Within 2 years of this consent, and every 3 years thereafter, unless the Director-General directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must: (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Director-General; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the development and assess whether it is complying with the relevant requirements in this consent and any relevant EPL (including any assessment, plan or program required under these consent s); (d) review the adequacy of strategies, plans or programs required under these consent s; and, if appropriate, (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these consent s. *Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Director-General.*	Section 5.3
6	Within 6 weeks of the completing of this audit, or as otherwise agreed by the Director-General, the Applicant must submit a copy of the audit report to the Director-General, together with its response to any recommendations contained in the audit report.	Section 5.3

Table A1-4: EPL No. 11205 Requirements

Condition	Requirement	Relevant EMS / Plan
A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. **Scheduled Activity** / **Fee Based Activity** / **Scale** Wood or timber milling or processing / Wood or timber milling or processing / > 200000 m3 annual processing capacity Wood preservation / Wood preservation / > 30000 m3 annual processing capacity	Section 2.2
P1.1	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.	AEMP Table 5-1
P1.3	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.	SWMP Table 5-1
P1.4	The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.	AEMP Table 5-1

Table A1-4: EPL No. 11205 Requirements

<table>
<tr><th>Condition</th><th>Requirement</th><th>Relevant EMS / Plan</th></tr>
<tr><td colspan="3">3. LIMIT CONDITIONS</td></tr>
<tr><td>L1
L1.1</td><td>Pollution of Waters
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.</td><td>SWMP
Table A1-1</td></tr>
<tr><td>L2
L2.1</td><td>Concentration Limits
For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number) the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.</td><td>Note.</td></tr>
<tr><td>L2.2</td><td>Air Concentration Limits

Point 23
<table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr><tr><td>Nitrogen Oxides</td><td>milligrams per cubic metre</td><td>200</td><td>Dry, 273 K, 101.3 kPa</td><td>7%</td><td>As per test method</td></tr><tr><td>Volatile organic compounds</td><td>milligrams per cubic metre</td><td>5</td><td>Dry, 273 K, 101.3 kPa</td><td>7%</td><td>As per test method</td></tr></table>
Point 36
<table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr><tr><td>Nitrogen Oxides</td><td>milligrams per cubic metre</td><td>500</td><td>Dry, 273 K, 101.3 kPa</td><td>7%</td><td>1 hour</td></tr><tr><td>Solid Particles</td><td>milligrams per cubic metre</td><td>50</td><td>Dry, 273 K, 101.3 kPa</td><td>7%</td><td>1 hour</td></tr><tr><td>Volatile organic compounds</td><td>milligrams per cubic metre</td><td>40</td><td>Dry, 273 K, 101.3 kPa</td><td>7%</td><td>1 hour</td></tr><tr><td>Type 1 and Type 2 substances in aggregate</td><td>milligrams per cubic metre</td><td>1</td><td>Dry, 273 K, 101.3 kPa</td><td>7%</td><td>1 hour</td></tr></table>
Point 37, 38
<table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr><tr><td>Type 1 and Type 2 substances in aggregate</td><td>milligrams per cubic metre</td><td>1</td><td>Dry, 273K, 101.3kPa</td><td></td><td>As per test method</td></tr><tr><td>Copper</td><td>milligrams per cubic metre</td><td>TBD</td><td>Dry, 273K, 101.3kPa</td><td></td><td>As per test method</td></tr></table></td><td>AEMP</td></tr>
<tr><td>L3.1</td><td>Waste
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.</td><td>No waste is received at the premises</td></tr>
<tr><td>L3.2</td><td>There must be no incineration or burning of chemically treated timber at the premises.</td><td>No incineration or burning is undertaken at the premises</td></tr>
</table>

Table A1-4: EPL No. 11205 Requirements

Condition	Requirement	Relevant EMS / Plan
L4.1	Noise limits Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2. POINT 21, 32, 33 Time period | Measurement parameter | Measurement frequency | Noise level dB(A) All hours | LAeq | Continuous | 35 Night | LAmax | Continuous | 45	Table 5-1 Section 5.1.4 Noise monitoring to be undertaken by suitably qualified acoustic consultant.
L4.2	For the purpose of Condition L4.1: a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sunday and Public Holidays; b) Evening is defined as the period 6pm to 10pm; and c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sunday and Public Holidays.	Section 5.1.4 Noise monitoring to be undertaken by suitably qualified acoustic consultant.
L4.3	The noise limits set out in Condition L4.1 apply under all meteorological conditions except for the following: a) Wind speeds greater than 3 metres/second at 10 metres above ground level; or b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or c) Stability category G temperature inversion conditions.	Section 5.1.4 Noise monitoring to be undertaken by suitably qualified acoustic consultant.
L4.4	For the purposes of Condition L4.3: a) The meteorological data to be used for determining meteorological conditions is the data recorded by the meteorological weather station identified as EPA Identification Point 22 must be used to determine meteorological conditions; and b) Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part E4 of Appendix E to the *New South Wales Industrial Noise Policy* (EPA 2000).	Section 5.1.4 Noise monitoring to be undertaken by suitably qualified acoustic consultant.
L4.5	For the purposes of determining the noise generated at the premises a Class 1 or 2 noise monitoring equipment as defined by AS IEC61672.1-2004 and AS IEC61672.2-2004, or other noise monitoring equipment accepted by the EPA in writing must be used.	Section 5.1.4 Noise monitoring to be undertaken by suitably qualified acoustic consultant.
L4.6	To determine compliance: a) with the Leq(15 minute) noise limits in Condition L4.1, the noise measurement equipment must be located: i) approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or ii) within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable iii) within approximately 50 metres of the boundary of a National Park, Nature Reserve or State Conservation Area. b) with the LAmax noise limits in Condition L4.1, the noise monitoring equipment must be located within 1 metre of a dwelling façade. c) the noise monitoring equipment must be located in a position that is: i) at the most affected point at a location where there is no dwelling at the location; or ii) at the most affected point within an area at a location prescribed by conditions L4.6(a) or L4.6(b).	Section 5.1.4 Noise monitoring to be undertaken by suitably qualified acoustic consultant.

Table A1-4: EPL No. 11205 Requirements

Condition	Requirement	Relevant EMS / Plan
L4.7	A breach of this Environment Protection Licence will still occur where noise generated from the premises in excess of the appropriate limit specified in the condition L4.1 is detected: • in an area at a location other than an area prescribed by condition L4.6; and/or at a point other than the most affected point at a location.	Section 5.1.4 Noise monitoring to be undertaken by suitably qualified acoustic consultant.
L4.8	For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.	Section 5.1.4 Noise monitoring to be undertaken by suitably qualified acoustic consultant.
L5.1	Potentially offensive odour No condition of this licence identifies a potentially offensive odour for the purposes of Section 129 of the Protection of the Environment Operations Act 1997. Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	AEMP
OPERATING CONDITIONS		
O1	Activities must be carried out in a competent manner O1.1 Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Monthly environmental inspection PMP
O2.2	Maintenance of plant and equipment All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Maintenance records
O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	AEMP DWRMMP
O4.1	The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date.	Emergency Management Procedures
O5.1	The licensee must ensure that any liquid and/or non liquid waste generated and/or stored at the premises is assessed and classified in accordance with the NSW EPA Waste Classification Guidelines (2014) as in force from time to time.	PMP
O5.2	The licensee must ensure that waste identified for recycling is stored separately from other waste.	PMP

Table A1-4: EPL No. 11205 Requirements

<table>
<tr><th>Condition</th><th>Requirement</th><th>Relevant EMS / Plan</th></tr>
<tr><td>O6.1 & O6.2</td><td>The licensee must not move timber treated with copper chrome arsenate (CCA) preservative at the premises from the sealed drip pad until the CCA preservative is 'drip free'.
In this licence 'drip free' has the same meaning as in AS/NZS 2843.1:2006, Timber Preservation plants - Timber preservation plant site design.</td><td>CCA Treated Timber Testing Procedure for Fixation using the Aquaspex Chromate Test Kit.</td></tr>
<tr><td colspan="3">MONITORING & RECORDING CONDITIONS</td></tr>
<tr><td>M1.1</td><td>The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.</td><td>Section 5.4.3</td></tr>
<tr><td>M1.2</td><td>All records required to be kept by this licence must be:
a) in a legible form, or in a form that can readily be reduced to a legible form;
b) kept for at least 4 years after the monitoring or event to which they relate took place; and
c) produced in a legible form to any authorised officer of the EPA who asks to see them.</td><td>Section 5.4.3</td></tr>
<tr><td>M1.3</td><td>The following records must be kept in respect of any samples required to be collected for the purposes of this licence:
a) the date(s) on which the sample was taken;
b) the time(s) at which the sample was collected;
c) the point at which the sample was taken; and
d) the name of the person who collected the sample.</td><td>Section 5.4.3</td></tr>
<tr><td>M2.2</td><td>Air Monitoring Requirements
Points 23, 36
<table>
<tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr>
<tr><td>Carbon dioxide</td><td>percent</td><td>Every 6 months</td><td>TM-24</td></tr>
<tr><td>Carbon monoxide</td><td>milligrams per cubic metre</td><td>Every 6 months</td><td>TM-32</td></tr>
<tr><td>Dry gas density</td><td>kilograms per cubic metre</td><td>Every 6 months</td><td>TM-23</td></tr>
<tr><td>Moisture</td><td>percent</td><td>Every 6 months</td><td>TM-22</td></tr>
<tr><td>Molecular weight of stack gases</td><td>grams per gram mole</td><td>Every 6 months</td><td>TM-23</td></tr>
<tr><td>Nitrogen Oxides</td><td>milligrams per cubic metre</td><td>Every 6 months</td><td>TM-11</td></tr>
<tr><td>Oxygen (O2)</td><td>percent</td><td>Every 6 months</td><td>TM-25</td></tr>
<tr><td>Solid Particles</td><td>milligrams per cubic metre</td><td>Every 6 months</td><td>TM-15</td></tr>
<tr><td>Temperature</td><td>degrees Celsius</td><td>Every 6 months</td><td>TM-2</td></tr>
<tr><td>Type 1 and Type 2 substances in aggregate</td><td>milligrams per cubic metre</td><td>Every 6 months</td><td>TM-12, TM-13 & TM-14</td></tr>
<tr><td>Velocity</td><td>metres per second</td><td>Every 6 months</td><td>TM-2</td></tr>
<tr><td>Volatile organic compounds</td><td>milligrams per gram</td><td>Every 6 months</td><td>TM-34</td></tr>
<tr><td>Volumetric flowrate</td><td>cubic metres per second</td><td>Every 6 months</td><td>TM-2</td></tr>
</table>
Points 37, 38
<table>
<tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr>
<tr><td>Copper</td><td>milligrams per cubic metre</td><td>Yearly</td><td>TM-12, TM-13 & TM-14</td></tr>
<tr><td>Moisture</td><td>percent</td><td>Yearly</td><td>TM-22</td></tr>
<tr><td>Temperature</td><td>degrees Celsius</td><td>Yearly</td><td>TM-2</td></tr>
<tr><td>Type 1 and Type 2 substances in aggregate</td><td>milligrams per cubic metre</td><td>Yearly</td><td>TM-12, TM-13 & TM-14</td></tr>
<tr><td>Volumetric flowrate</td><td>cubic metres per second</td><td>Yearly</td><td>TM-2</td></tr>
</table></td><td>AEMP
Section 5.1.5</td></tr>
</table>

Table A1-4: EPL No. 11205 Requirements

<table>
<tr><th>Condition</th><th>Requirement</th><th>Relevant EMS / Plan</th></tr>
<tr><td>M2.3</td><td>Water and/ or Land Monitoring Requirements

Points 1,2,3,4
<table>
<tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr>
<tr><td>Arsenic</td><td>milligrams per kilogram</td><td>2 Times a year</td><td>Representative sample</td></tr>
<tr><td>Chromium (total)</td><td>milligrams per kilogram</td><td>2 Times a year</td><td>Representative sample</td></tr>
<tr><td>Chromium (VI) Compounds</td><td>milligrams per kilogram</td><td>2 Times a year</td><td>Representative sample</td></tr>
<tr><td>Copper (total)</td><td>milligrams per kilogram</td><td>2 Times a year</td><td>Representative sample</td></tr>
</table>

Points 5,6,7
<table>
<tr><td>Arsenic</td><td>milligrams per litre</td><td>2 Times a year</td><td>Representative sample</td></tr>
<tr><td>Chromium (total)</td><td>milligrams per litre</td><td>2 Times a year</td><td>Representative sample</td></tr>
<tr><td>Chromium (VI) Compounds</td><td>milligrams per litre</td><td>2 Times a year</td><td>Representative sample</td></tr>
<tr><td>Copper</td><td>milligrams per litre</td><td>2 Times a year</td><td>Representative sample</td></tr>
<tr><td>Dissolved Oxygen</td><td>colour units</td><td>2 Times a year</td><td>In situ</td></tr>
<tr><td>Electrical conductivity</td><td>siemens</td><td>2 Times a year</td><td>In situ</td></tr>
<tr><td>Hardness (as calcium carbonate)</td><td>milligrams per litre</td><td>2 Times a year</td><td>In situ</td></tr>
<tr><td>pH</td><td>pH</td><td>2 Times a year</td><td>In situ</td></tr>
<tr><td>Redox potential</td><td>millivolts</td><td>2 Times a year</td><td>In situ</td></tr>
<tr><td>Total organic carbon</td><td>milligrams per litre</td><td>2 Times a year</td><td>Representative sample</td></tr>
</table>

Points 10 – 19
<table>
<tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr>
<tr><td>Arsenic</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr>
<tr><td>Chromium (total)</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr>
<tr><td>Chromium (VI) Compounds</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr>
<tr><td>Copper</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr>
<tr><td>Dissolved Oxygen</td><td>colour units</td><td>Yearly</td><td>In situ</td></tr>
<tr><td>Electrical conductivity</td><td>siemens</td><td>Yearly</td><td>In situ</td></tr>
<tr><td>Iron</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr>
<tr><td>pH</td><td>pH</td><td>Yearly</td><td>In situ</td></tr>
<tr><td>Total copper</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr>
<tr><td>Total dissolved solids</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr>
<tr><td>Total organic carbon</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr>
<tr><td>Zinc</td><td>milligrams per litre</td><td>Yearly</td><td>Representative sample</td></tr>
</table>
</td><td>SWMP</td></tr>
<tr><td>M3.1</td><td>Testing Methods – concentration limits
Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:
a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or
b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or
c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</td><td>AEMP
Section 5.1.5</td></tr>
<tr><td>M3.2</td><td>Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.

Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</td><td>SWMP
AEMP
Section 5.1.1</td></tr>
</table>

Table A1-4: EPL No. 11205 Requirements

<table>
<tr><th>Condition</th><th>Requirement</th><th>Relevant EMS / Plan</th></tr>
<tr><td>M4</td><td>M4.1 The meteorological weather station must be maintained so as to be capable of continuously monitoring
the parameters specified in this section.
M4.2 For each monitoring point specified in the table below the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1. The licensee must use the sampling method, units of measure, averaging period and sample at the frequency, specified opposite in the other columns.
Point 22 - Automated Weather Station
<table>
<tr><th>Parameter</th><th>Units of Measure</th><th>Frequency</th><th>Averaging Period</th><th>Sampling Method</th></tr>
<tr><td>Temperature @ 2 metres</td><td>°C</td><td>Continuous</td><td>15 minute</td><td>AM-4</td></tr>
<tr><td>Wind direction @ 10 metres</td><td>°</td><td>Continuous</td><td>15 minute</td><td>AM-2 & AM-4</td></tr>
<tr><td>Wind speed @ 10 metres</td><td>m/s</td><td>Continuous</td><td>15 minute</td><td>AM-2 & AM-4</td></tr>
<tr><td>Sigma theta @ 10 metres</td><td>°</td><td>Continuous</td><td>15 minute</td><td>AM-2 & AM-4</td></tr>
<tr><td>Rainfall</td><td>mm</td><td>Continuous</td><td>15 minute</td><td>AM-4</td></tr>
<tr><td>Temperature @ 10 metres</td><td>°C</td><td>Continuous</td><td>15 minute</td><td>AM-4</td></tr>
<tr><td>Solar radiation</td><td>W/m2</td><td>Continous</td><td>15 minute</td><td>AM-4</td></tr>
</table>
M4.3 At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.
Point 34
<table>
<tr><th>Parameter</th><th>Sampling method</th><th>Units of measure</th><th>Averaging period</th><th>Frequency</th></tr>
<tr><td>Temperature at 2 metres</td><td>AM-4</td><td>degrees Celsius</td><td>15 minutes</td><td>Continuous</td></tr>
<tr><td>Wind Direction at 10 metres</td><td>AM-2 & AM-4</td><td>Degrees</td><td>15 minutes</td><td>Continuous</td></tr>
<tr><td>Wind Speed at 10 metres</td><td>AM-2 & AM-4</td><td>metres per second</td><td>15 minutes</td><td>Continuous</td></tr>
<tr><td>Sigma theta</td><td>AM-2 & AM-4</td><td>Degrees</td><td>15 minutes</td><td>Continuous</td></tr>
<tr><td>Rainfall</td><td>AM-4</td><td>millimetres per hour</td><td>15 minutes</td><td>Continuous</td></tr>
<tr><td>Temperature at 10 metres</td><td>AM-4</td><td>degrees Celsius</td><td>15 minutes</td><td>Continuous</td></tr>
<tr><td>Total Solar Radiation</td><td>AM-4</td><td>Watts per square metre</td><td>15 minutes</td><td>Continuous</td></tr>
</table></td><td>AEMP
Section 5.1.9
Table 5-1</td></tr>
<tr><td>M5.1</td><td>The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.</td><td>Section 4.1</td></tr>
<tr><td>M5.2</td><td>The record must include details of the following:
a) the date and time of the complaint;
b) the method by which the complaint was made;
c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
d) the nature of the complaint;
e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
f) if no action was taken by the licensee, the reasons why no action was taken.</td><td>Section 4.1</td></tr>
<tr><td>M5.3</td><td>The record of a complaint must be kept for at least 4 years after the complaint was made.</td><td>Section 4.1</td></tr>
<tr><td>M6</td><td>Telephone complaints line
M6.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.
M6.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.
M6.3 The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.</td><td>Section 4.1</td></tr>
<tr><td>M7</td><td>Other monitoring and recording conditions</td><td></td></tr>
</table>

Table A1-4: EPL No. 11205 Requirements

Condition	Requirement	Relevant EMS / Plan
M7.1	To determine compliance with Condition L4.1, attended noise monitoring must be undertaken in accordance with Conditions L4.5 and L4.6 and: a) at the locations EPA Identification Points 32 and 33, as listed in Condition L4.1; b) occur annually; c) occur during each day, evening and night period as defined in the New South Wales Industrial Noise Policy (EPA 2000) for a minimum of: - 1.5 hours during the day; - 30 minutes during the evening; and - 1 hour during the night. d) occur for three consecutive days.	Noise monitoring to be undertaken by suitably qualified acoustic consultant. Section 5.1.4
M7.2	The licensee must monitor (by sampling and obtaining results by analysis) that timber, treated with copper chrome arsenate (CCA) preservative at the premises, is 'drip free' prior to movement of the treated timber from the sealed drip pad area, by: a) sampling at least one batch of CCA treated timber each month using the method outlined at Appendix C AS/NZS 2843.1:2006, Timber Preservation Plants – Timber preservation plant site design; and b) analysing the sample using a field test kit such as Merck Aquaquant Test Kit 1.14441.0001 or equivalent.	CCA Treated Timber Testing Procedure for Fixation using the Aquaspex Chromate Test Kit.
REPORTING CONDITIONS		
R1	Annual return documents R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices.	Section 5.1.1
R2	Notification of environmental harm R2.1 Notifications must be made by telephoning the Environment Line service on 131 555. R2.2 The licensee must provide written details of the chen to the EPA within 7 days of the date on which the incident occurred. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	PIRMP

Table A1-4: EPL No. 11205 Requirements

Condition	Requirement	Relevant EMS / Plan
R3	Written report R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event. R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request. R3.3 The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;	PRIMP
	e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	
R4	Other reporting conditions R4.1 A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the annual monitoring required by Condition M7.1. The assessment must be prepared by a suitably qualified and experienced acoustical consultant and include: a) an assessment of compliance with noise limits presented in Condition L4.1; and b) an outline of any management actions taken within the monitoring period to address any exceedances of the limits contained in Condition L4.1.	Table 5-1 Section 5.1.4
GENERAL CONDITIONS		
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	
POLLUTION STUDIES AND REDUCTION PROGRAMS		
U1 U1.1	Noise validation monitoring and assessment By 1 November 2020, the Licensee must engage a suitably qualified and experienced acoustical practitioner/s to undertake a noise validation assessment of noise generating activities occurring at the licensed Premises (the Noise Validation Assessment).	Complete

Table A1-4: EPL No. 11205 Requirements

Condition	Requirement	Relevant EMS / Plan
U1.2	By 30 December 2020, the suitably qualified and experienced acoustical practitioner/s engaged by the Licensee in accordance with U1.1 must undertake the Noise Validation Assessment referred to in condition U1.1.	
U1.3	The Noise Validation Assessment must: 1. be undertaken in accordance with the NSW Industrial Noise Policy; 2. include, but not be limited to: a. the identification and assessment of each noise generating source located at the licensed premises during day, evening and night time periods defined in condition L4.2 b. the assessment of the contribution of individual and combined noise sources to noise generation at nominated sensitive receivers; c. a comparison of the results of the Noise Validation Assessment with the noise assessment undertaken in 2018 (Dongwha Australia Operation Noise Monitoring – Blackett Acoustic, August 2018) to determine how the mitigation measures have affected noise emissions from the premises; and d. a comparison of the results of the Noise Validation Assessment with the limit conditions referred to in condition L4.1. 3. where noise levels are found to exceed the limit condition under condition L4.1 of the licence, detail proposed noise mitigation measures (including the associated predicted noise attenuation from these measures) to achieve compliance with consented noise limits at sensitive receivers. This should include the provision of reasonable and feasible timeframes for the implementation of recommended controls.	Complete
U1.4	By 29 January 2021, the Licensee must submit a report outlining the findings and recommendations of the noise assessment to NSW EPA's Manager Regulatory Operations - Regional South.	Complete
U2 U2.1	Quality assurance and quality control program – 2.5 MW boiler By 15 February 2021, the Licensee must develop and implement a rigorous ongoing Quality Assurance and Quality Control Program to ensure proper and efficient operation of the 2.5MW boiler. The Quality Assurance and Quality Control Program must include, but need not be limited to: a) A set of processes that demonstrate and facilitate reliable and robust compliance with the licence and with Section 124 to 128 of the Protection of the Environment Operations Act 1997. This should include processes relating to: i) operation (including but not limited to the standard operating conditions of the boiler and the implementation of operational procedures and practices) ii) maintenance (preventative and remedial) iii) audit and incident response b) Standards of staff competencies, including but not limited to: i) suitable awareness of all operational management plans; ii) suitable awareness of standard operating procedures; and iii) staff training requirements c) Any other relevant matters	Complete
U2.2	By 28 February 2021, the Licensee must submit a copy of the Quality Assurance and Quality Control Program to NSW EPA's Manager Regulatory Operations - Regional South.	Complete
U3 U3.1	2.5 MW Wood Fired Redry Boiler Improvement Works The Licensee must engage a suitably qualified and experienced person/s to implement Recommendation 2 of the Air Quality Assessment of Various Emissions to Air to Inform a Pollution Studies Program for a 2.5MW Biomass Boiler within the Bombala Timber Mill, NSW dated 20 February 2020. In particular, the Licensee must implement the steps listed under conditions U3.2 - U3.4 by the relevant nominated dates.	Section 5.5

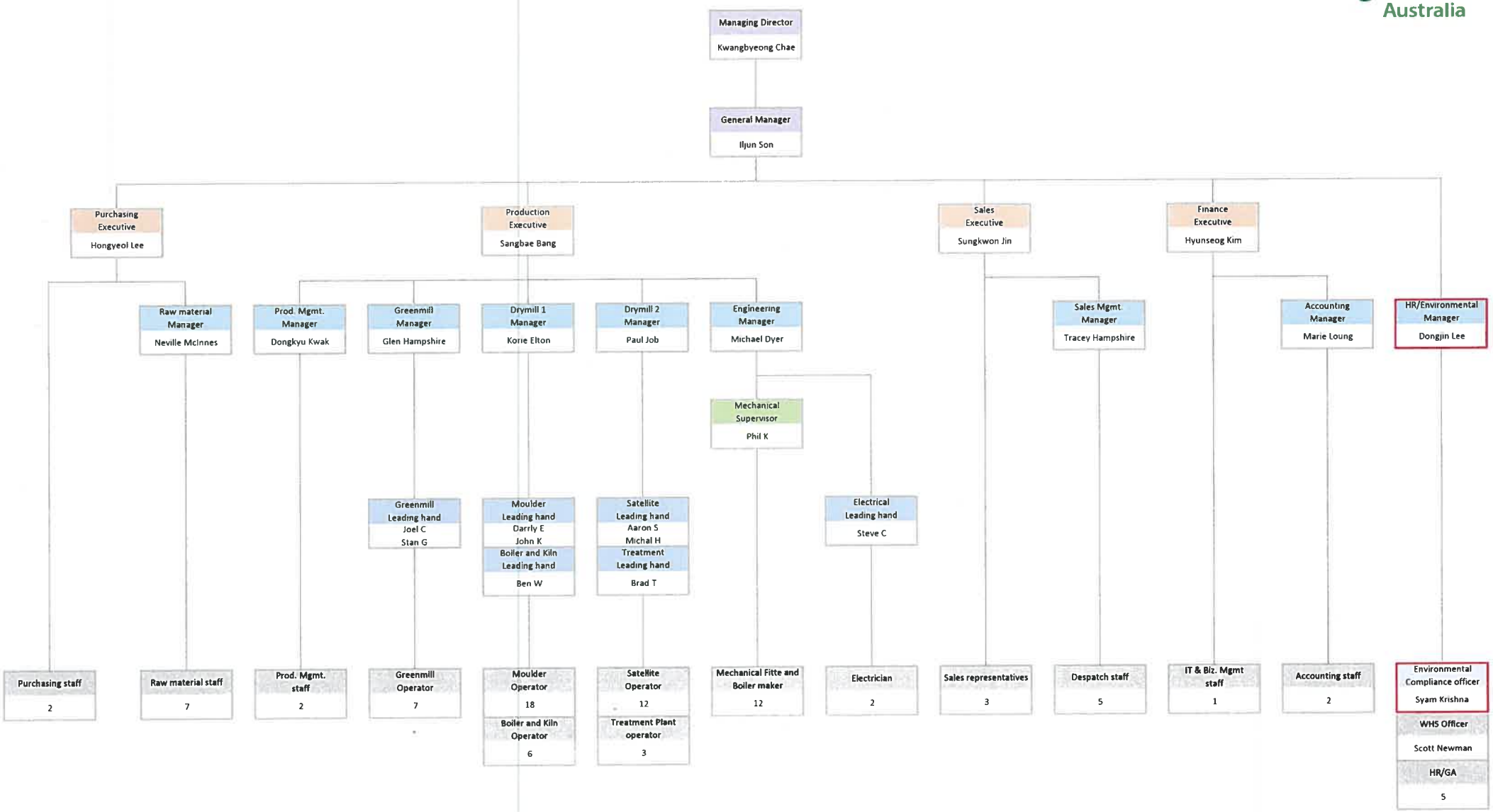
Table A1-4: EPL No. 11205 Requirements

Condition	Requirement	Relevant EMS / Plan
U3.2	By 1 November 2021 the Licensee must engage a suitably qualified and experienced person/s to: 1. Install a manual butterfly damper at the inlet of each secondary air fan; 2. Reinstate the fan motors; 3. Automate the fan inlet butterfly dampers by adding a 4-20 mA actuator that positions the butterfly dampers according to boiler load; 4. Install a pressure transmitter in the duct between the furnace and evaporator tube bank to serve as the furnace pressure signal; and 5. Install a K-type thermocouple in the duct between the furnace and evaporator tube bank	Section 5.5
U3.3	By 1 March 2022 the Licensee must engage a suitably qualified and experienced person/s to: 1. Install a tapping point in the duct between the evaporator tube bank and the multiclone to suit a flue gas analyser probe; 2. Add tapping points at the inlet and outlet of the multiclone for connecting a manometer for reading the differential pressure; 3. Add the furnace pressure signal to the control system; and 4. Add the ability to manually input the furnace pressure ramping set-point	Section 5.5
U3.4	By 15 May 2022, the Licensee must engage a suitably qualified and experienced person/s to undertake commissioning works for the 2.5MW Boiler Improvement Works	Section 5.5
U3.5	By 1 June 2022, the Licensee must submit a copy of the Commissioning Report for the 2.5MW boiler Improvement Works to the Manager Regulatory Operations - Regional South	Section 5.5

Appendix 3: Organisation Chart

Dongwha Australia Organizatinal Chart -1 (Total staff numbers : 115 persons)*

Dongwha Australia



Dongwha
Dongwha Australia - 1 Sandy Lane, Po Box 146,
Bombala NSW 2632. Australia
Tel. 02 6459 5555 Fax. 02 6458 3756
www.dongwha.com.au

ENVIRONMENTAL CHECKLIST

Leading Hand:

Site: Sandy Lane, Bombala **Area:**

Date:

Weather Conditions:

	Yes	No	N/A
The site is generally in tidy condition			
All materials and equipment are contained within the site boundary			
All works are undertaken within the site boundary			
Daily environmental inspections completed as required			
Dust control acceptable			
Noise control acceptable			
All traffic on designated routes			
No mud / dirt on public roads			
Dust Suppression, i.e. water cart, is being used to minimize dust emissions			
No oil leaks or spills visible on site			
Wastes are segregated in designated containers			
Storage of chemicals in appropriate location			
Refuelling in designated areas			
Spill kits available in designated areas			

NOTES:

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WHS CHECKLIST

WEEKLY PATROL GENERAL AREA		
Patrol Item	**Status Yes/No**	**Comments**
Procedures being followed		
General Area		
Plant Operators using UHF		
Plant Operators driving to conditions		
Lockout Procedures/mobile phones/smoking rules are being followed in all areas		
PPE being used		
General Area		
Plant operators wearing appropriate work clothing		
General Items		
Walkways are clear of obstacles		
Drains are clear of debris		
General rubbish in bins		
Emergency exits are clear		
Fire hose & Extinguishers kept clear		
Signage in good condition		
Grass has been cut		
Car park in good condition		
Items Requiring Action		
Patrol Conducted by and Date	Name:	Date: