

APPENDIX G

Lamberts North Ash Repository Internal Audit CoA – Schedule 2 August 2018

Audit Report				
Audit Summary	<ul style="list-style-type: none"> • Within the audit limitations and audit methodology listed below, the Project Conditions of Approval for Lamberts North Ash Repository - Schedule 2, are generally Compliant. • Audit Finding items are summarised adjacent, and are detailed within the report. • Observations in brief: <ul style="list-style-type: none"> - A1 Consider adding full title for each part of Environmental Assessment on website. - Consider adding links from Lamberts North webpage to: <ul style="list-style-type: none"> B10 Community Reference Group meeting Minutes published on Mt Piper and Wallerawang community webpage. B12 Contact details published on Mt Piper webpage. B13 Update email and additional phone number contact details in next AMER (Appendix A). E21 2016-17 AEMR signed 16 Jan 2018 version on LAN, not Objective; incorrect Object ID and '2015-16' in some sections. 	Audit Findings (please see Audit Criteria overleaf, for full description)		
		NC-H	Non-compliance – High	0
		NC-M	Non-compliance – Medium	0
		NC-L	Non-compliance – Low	0
		NC-A	Administrative non-compliance	0
		C	Compliant	21
		NA	Not Assessed	22
		O	Observation	13
	<ul style="list-style-type: none"> - Consider including B6 Biodiversity Offsets, B7 Ecological Monitoring Program, D3e Landscape/Revegetation Plan, D3f Site Rehabilitation Management Plan, D4 Geotechnical Impacts, E19-E20 Environmental Incident Reporting, and E21 Annual Performance Reporting, in future audit schedules. 			
Auditor	Skye Zorz, Mt Piper Systems Officer HSSE, incumbent Lamberts North Ash Repository Environmental Representative			
Audit Date	31 August 2018			
Audit Type	Internal Audit			
Audit Method	Desktop sampling			
Audit Scope	Project Conditions of Approval for Lamberts North Ash Repository - Schedule 2			
Audit Limitations	Broad and limited depth audit: <ul style="list-style-type: none"> - based on presence and absence of required documentation, not degree (or quality) of implementation; - other items 'Not Assessed' due to coverage by previous internal audits; - other items 'Not Assessed' due to no current issues identified; - other items 'Not Assessed' due to no construction activities currently underway; - other items 'Not Assessed' due to project still being in operational phase. 			
Audit Documents	Document Title	Document Reference		
	Project Approval 09_0186 Schedules 1 & 2 Conditions of Approval	https://www.energyaustralia.com.au/sites/default/files/2017-03/conditons-of-approval.pdf		
	All project approval documents on Planning website	http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=3574		
	Lamberts North Ash Repository – project information on EA website	https://www.energyaustralia.com.au/about-us/energy-generation/lamberts-north-ash-repository		

	Lamberts North Ash Repository Compliance Tracking document	https://www.energyaustralia.com.au/sites/default/files/2017-03/compliance-and-tracking.pdf	
	Mt Piper and Wallerawang Power Stations – Community Reference Group – meeting minutes	https://www.energyaustralia.com.au/about-us/energy-generation/mt-piper-power-station/mt-piper-and-wallerawang-community	
	Mt Piper Power Station – Contact Us details	https://www.energyaustralia.com.au/about-us/energy-generation/mt-piper-power-station	
	2016-17 Mt Piper Ash Placement Project, Lamberts North Annual Environment Management Report	https://www.energyaustralia.com.au/sites/default/files/2018-01/20180116_AEMR%20Lamberts%20North%202016-17_reviewed_final_complete.pdf	
	Lamberts North Ash Placement Project – Construction Environmental Management Plan, CDM Smith / Delta Electricity – Western, December 2012	https://www.energyaustralia.com.au/sites/default/files/2017-03/Construction%20Environmental%20Management%20Plan%202012.pdf	
	Lamberts North Ash Placement Project – Operation Environmental Management Plan, CDM Smith / Delta Electricity – Western, May 2013	https://www.energyaustralia.com.au/sites/default/files/2017-04/130509%20OEMP%20Final%20.pdf	
	MP-PL-701 – Mount Piper & Lamberts North Ash, Dust, Brine Repository Management Plan, LendLease, May 2017	Hardcopy provided by LendLease	
	Biodiversity Offset Management Plan – Lamberts North, July 2015	https://www.energyaustralia.com.au/sites/default/files/2017-03/Biodiversity%20Offset%20Management%20Plan%202015.pdf	
	Ash Management Strategy, July 2012	https://www.energyaustralia.com.au/sites/default/files/2017-03/Ash%20Management%20Strategy.pdf	
	130509 Approval from DG re OEMP (Objective Reference: B970776)		
	20150824 Letter from DPE regarding Mt Piper Ash Placement Project (MP09_0186) - Lamberts North Biodiversity Offset Management Plan (Objective Reference: A756977)		
Audit Criteria	Risk Level	Colour Code	Description
	High	NC-H	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
	Medium	NC-M	Non-compliance with: <ul style="list-style-type: none"> • Potential for serious environmental consequences, but is unlikely to occur; or • Potential for moderate environmental consequences, but is likely to occur.
	Low	NC-L	Non-compliance with: <ul style="list-style-type: none"> • Potential for moderate environmental consequences, but is unlikely to occur; or • Potential for low environmental consequences, but is likely to occur.
	Administrative non-compliance	NC-A	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).
	Compliant	C	The intent and all elements of the requirement of the regulatory approval have been complied with.
	Not Assessed	NA	Not assessed.
	Observation	O	Observation, based on identified inconsistency or opportunity for improvement.

Lamberts North Ash Repository – Conditions of Approval – Schedules 2		Finding	Comments / Evidence
Schedule 2 – Conditions of Approval			
Part A – Administrative Conditions			
Terms of Approval			
A1	The proponent shall carry out the project generally in accordance with the: (a) Major Project Application 09_0186; (b) Mt Piper Ash Placement (two volumes) – Environmental Assessment, prepared by Sinclair Knight Merz, August 2010; (c) Mt Piper Ash Placement – Submissions Report, prepared by Sinclair Knight Merz, March 2011; (d) Delta’s Letter to the Department – Submissions Report response to the Department and Agency Issues, dated 22 June 2011; and (e) the conditions of this approval.	C	<ul style="list-style-type: none"> All documents exist and are publicly available as follows: <ul style="list-style-type: none"> (a) (b) (c) (e): http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=3574 (a) (b) (c) (d) (e): https://www.energyaustralia.com.au/about-us/energy-generation/lamberts-north-ash-repository accordions, as follows: <ul style="list-style-type: none"> (a) ‘Project Approval’ accordion: https://www.energyaustralia.com.au/sites/default/files/2017-03/ash-placement-project-application.pdf (b) ‘Environmental Assessment’ accordion: <ul style="list-style-type: none"> Part 1: https://www.energyaustralia.com.au/sites/default/files/2017-03/Part%201.pdf Part 2 Key issues: https://www.energyaustralia.com.au/sites/default/files/2017-03/Part%202%20Key%20Issues.pdf Part 3: https://www.energyaustralia.com.au/sites/default/files/2017-03/Part%203.pdf (c) ‘Environmental Assessment’ accordion: https://www.energyaustralia.com.au/sites/default/files/2017-04/110622%20Letter%20%20Attachment%20to%20DPI%20re%20Comments%20Sub%20Rpt.pdf (d) ‘Environmental Assessment’ accordion: https://www.energyaustralia.com.au/sites/default/files/2017-04/110622%20Letter%20%20Attachment%20to%20DPI%20re%20Comments%20Sub%20Rpt.pdf (e) ‘Project Approval’ accordion: https://www.energyaustralia.com.au/sites/default/files/2017-03/conditons-of-approval.pdf The scope of the OEMP was prepared with specific consideration of relevant measures to address requirements of (a)/(e), (b), (c), and was also prepared to address relevant stipulations and commitments in (d).
		O	<ul style="list-style-type: none"> Observation: Mt Piper Ash Placement – Environmental Assessment, prepared by Sinclair Knight Merz, August 2010 is published under the https://www.energyaustralia.com.au/about-us/energy-generation/lamberts-north-ash-repository ‘Environmental Assessment’ accordion titled “Part 1”, “Part 2 Key Issues” and “Part 3”. Consider adding full title, ‘Mt Piper Ash Placement – Environmental Assessment’ for each part.
A2	In the event of an inconsistency between: (a) The conditions of this approval and any document listed from condition A1a) – A1d) inclusive the	NA	<ul style="list-style-type: none"> Noted, no current issues identified.

Lamberts North Ash Repository – Conditions of Approval – Schedules 2		Finding	Comments / Evidence
	<p>conditions of this approval shall prevail to the extent of the inconsistency; and</p> <p>(b) Any of the documents listed from the condition A1a) –A1d) inclusive, the most recent document shall prevail to the extent of the inconsistency.</p>		
A3	<p>The proponent shall comply with the reasonable requirements of the Director-General arising from the Department's assessment of:</p> <p>(a) Any reports, plans or correspondence that are submitted in accordance with this approval; and</p> <p>(b) The implementation of any actions or measures contained in these reports, plans or correspondence.</p>	NA	<ul style="list-style-type: none"> Noted, no current issues identified.
A4	<p>The proponent shall meet the requirements of the Director-General in respect of the implementation of any measure necessary to ensure compliance with the conditions of this approval, and general consistency with the documents listed under condition A1 of this approval.</p>	NA	<ul style="list-style-type: none"> Noted, no current issues identified.
Limits of Approval			
A5	<p>This approval shall lapse five years after the date on which it is granted, unless the works that are the subject of this approval are physically commenced on or before that time.</p>	C	<ul style="list-style-type: none"> Project Approval is dated 16 February 2012, with construction works on the Lamberts North Ash Repository project physically commencing in January 2013 (greater than four years prior to lapse date), following approval of the CEMP by DP&E in December 2012, and ash placement commencing in September 2013.
Statutory Requirements			

Lamberts North Ash Repository – Conditions of Approval – Schedules 2		Finding	Comments / Evidence
A6	The Proponent shall ensure that all licences, permits and approvals are updated and/or obtained as required by law and maintained as required with respect to the project. No condition of this approval removes the obligation for the Proponent to obtain, renew or comply with such licences, permits or approvals.	C	<ul style="list-style-type: none"> • Prior to construction, licences for sinking boreholes were obtained from the NSW Office of Water. • According to the Environmental Assessment (SKM, 2010), and OEMP (CDM Smith, 2013), no permits were required during the operational phase of the project. • No Commonwealth permits, licences or approvals have been identified for the project. • The project complies with the requirements of EnergyAustralia NSW's EPL 13007.
Staging			
A7	Where the Proponent intends to construct and operate the project in discrete stage (i.e. Lamberts North and Lamberts South) it may comply with the requirements in conditions B4, B5, D2, D3 and D4 separately for each stage.	C	<ul style="list-style-type: none"> • This Condition of Approval gives consent to develop both Lamberts North and South sites, allowing the project to be staged with separate CEMPs and OEMPs being required for Lamberts North (the first developed) and Lamberts South. • In February 2012, Delta (and subsequently EnergyAustralia NSW in September 2013) acquired Lamberts North, within Lots 9 & 15 DP804929 – approximately 53ha in area. • CEMP (CDM Smith, 2012) for construction (B4) of Lamberts North including: <ul style="list-style-type: none"> - Construction Noise Management Plan (B5) was approved by the DPI 1 December 2012. • OEMP (CDM Smith, 2013) for operation (D2) of Lamberts North including: <ul style="list-style-type: none"> - the Operational Noise Management Plan (D3); and - Groundwater Management Plan (D4) was approved by the DPI on 13 May 2013. • North Lamberts North – approximately 20ha site area constructed for ash placement within Lamberts North, commenced construction in January 2013 and commenced placement in September 2013. • Lamberts South – development is pending land acquisitions, CEMP and OEMP approval.
Part B – Prior to Construction Conditions			
Environmental Representative			

<p>B1</p>	<p>Prior to the commencement of any construction activities, or as otherwise agreed by the Director-General, the Proponent shall nominate for the approval of the Director-General a suitably qualified and experienced Environmental Representative(s). The Proponent shall engage the Environmental Representative(s) during any construction activities, and throughout the life of the project, or as otherwise agreed by the Director-General. The Environmental Representative(s) shall:</p> <ul style="list-style-type: none"> (a) oversee the implementation of all environmental management plans and monitoring programs required under this approval, and advise the Proponent upon the achievement of these plans/programs; (b) consider and advise the Proponent on its compliance obligations against all matters specified in the conditions of this approval and the Statement of Commitments; and (c) have the authority and independence to recommend to the Proponent reasonable steps to be taken to avoid or minimise unintended or adverse environmental impacts and, failing the effectiveness of such steps, to recommend to the Proponent that relevant activities are to be ceased as soon as reasonably practicable if there is a significant risk that an adverse impact on the environment will be likely to occur. 	<p>C</p>	<ul style="list-style-type: none"> • In October 2012 Delta Electricity nominated the Senior Environment Officer Kelly Gillen as the Environmental Representative. The Senior Environment Officer was approved as the Environmental Representative by the DPI on 01 December 2012. • In April 2015, EnergyAustralia NSW notified the DP&E of Mrs Gillen’s new position within the organisation and nominated the new Senior Environment Officer Coleen Milroy as the Environmental Representative. • The Senior Environment Officer: <ul style="list-style-type: none"> - oversees the implementation of Lamberts North operations through attendance at Monthly Client Meetings with Lend Lease. - guides the project through site visits, sampling, auditing and other regulatory activities to ensure compliance with the environmental requirements of the CoAs and all relevant licences. • In April 2018, EnergyAustralia NSW notified the DP&E of Mrs Milroy’s resignation from the organisation and nominated the HSSE Systems Officer, Skye Zorz, as the replacement Environmental Representative.
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Lamberts North Ash Repository – Conditions of Approval – Schedules 2		Finding	Comments / Evidence
B2	Groundwater Modelling.	C	<ul style="list-style-type: none"> Groundwater modelling completed: <ul style="list-style-type: none"> Groundwater modelling report, prepared by CDM Smith in November 2012. Prepared in consultation with SCA and evaluated the potential impacts of construction and operational activities at the site and to assist in determining appropriate surface and groundwater management measures. No construction work has commenced at Lamberts South.
B3	Groundwater Monitoring.	C	<ul style="list-style-type: none"> Groundwater monitoring commenced: <ul style="list-style-type: none"> Groundwater bores were installed in July 2012 and were licenced for their construction with NSW Office of Water. The first sampling event for baseline testing was performed upon installation and prior to construction. The location and parameters to be undertaken were done in consultation with SCA. Existing historical groundwater bores that were established since the construction of Mt Piper are used to supplement the newly installed groundwater bores.
B4	CEMP.	C	<ul style="list-style-type: none"> CEMP prepared and approved: <ul style="list-style-type: none"> CEMP (CDM Smith, 2012) for construction at Lamberts North was developed in consultation with Delta Electricity Environment Section, NOW and SCA. The CEMP was approved by the DPI in December 2012. https://www.energyaustralia.com.au/sites/default/files/2017-03/Construction%20Environmental%20Management%20Plan%202012.pdf
B5	CEMP plans: (a) Construction Noise Management Plan. (b) Groundwater Management Plan. (c) Soil and Surface Water Management Plan. (d) Air Quality Management Plan. (e) Flora and Fauna Management Plan. (f) Aboriginal Heritage Plan. (g) Ash Transportation Plan.	C	<ul style="list-style-type: none"> CEMP contains the following plans: <ul style="list-style-type: none"> CEMP and all associated sub-plans for Lamberts North (CDM Smith, 2012) was developed in consultation with Delta Electricity's Environment Section, NOW and SCA. The CEMP was approved by the DPI on 01 December 2012.
B6	Biodiversity Offsets.	C	<ul style="list-style-type: none"> Biodiversity Offset Management Plan (BOMP) for Lamberts North CEMP prepared and approved: <ul style="list-style-type: none"> in consultation with OEH was submitted 14 May 2013 to DPI. BOMP was not approved 18 June 2013 and DPI requested the BOMP to be revised to include an offset of 1:1 to the existing rehabilitation site and be resubmitted. BOMP was revised in consultation with OEH and submitted 23 July 2015.

Lamberts North Ash Repository – Conditions of Approval – Schedules 2		Finding	Comments / Evidence
			<ul style="list-style-type: none"> - Revised BOMP was approved 24 August 2015. - https://www.energyaustralia.com.au/sites/default/files/2017-03/Biodiversity%20Offset%20Management%20Plan%202015.pdf • A Biodiversity Offset Strategic Outline (BOSO) was prepared for Lamberts South and was considered appropriate by the Department.
		O	<ul style="list-style-type: none"> • Observation: Biodiversity Offsets not previously internally audited, therefore consider including this area of CoA in future audit schedules.
B7	Ecological Monitoring Program.	C	<ul style="list-style-type: none"> • The Ecological Monitoring Plan (EMP) prepared and approved: <ul style="list-style-type: none"> - produced 31 November 2012 in consultation with NOW and DPI (Fisheries). - Baseline data was sampled 7 November 2012 and autumn and spring sampling commenced in 2013 to present.
		O	<ul style="list-style-type: none"> • Observation: Ecological Monitoring Program not previously internally audited, therefore consider including this area of CoA in future audit schedules.
B8- B9	Compliance Monitoring and Tracking.	C	<ul style="list-style-type: none"> • Compliance Tracking program prepared and approved: <ul style="list-style-type: none"> - developed & implemented prior to commencing construction. - Compliance and Tracking document approved by DPI on 13 December 2012. - https://www.energyaustralia.com.au/about-us/energy-generation/lamberts-north-ash-repository
B10	Community Information and Complaints Management Procedure of Information.	C	<ul style="list-style-type: none"> • Internal audit (Complaints and Communication) conducted by Coleen Milroy and Kyle Brown Aug-2016. • Project website is available for the Lamberts North Project: https://www.energyaustralia.com.au/about-us/energy-generation/lamberts-north-ash-repository • Webpage hosts the Environmental Assessment, Submissions report and approvals, as well as Environmental Management Plans, Annual Environmental Management Reports and Compliance Tracking. • Progress on operations and outcomes of compliance tracking are detailed within the Quarterly Community Reference Group meeting and the minutes from this meeting are available from the following website: https://www.energyaustralia.com.au/about-us/energy-generation/mt-piper-power-station/mt-piper-and-wallerawang-community
		O	<ul style="list-style-type: none"> • Observation: see B8-B9 above.

Lamberts North Ash Repository – Conditions of Approval – Schedules 2		Finding	Comments / Evidence
		O	<ul style="list-style-type: none"> Observation: consider adding link from https://www.energyaustralia.com.au/about-us/energy-generation/lamberts-north-ash-repository page to Minutes of the Community Reference Group meeting published on https://www.energyaustralia.com.au/about-us/energy-generation/mt-piper-power-station/mt-piper-and-wallerawang-community page.
B11-B12	Complaints and Enquiries Procedures.	C	<ul style="list-style-type: none"> Internal audit (Complaints) conducted by Coleen Milroy and Kyle Brown Aug-2016. Contact details are available from the following website: https://www.energyaustralia.com.au/about-us/energy-generation/mt-piper-power-station This website lists the following contact details: <ul style="list-style-type: none"> <u>Phone</u>: 24 hour contact number on (02) 6354 8111 or 1800 756 968 <u>Postal Address</u>: Mt Piper Power Station, Locked Bag 1000, Portland NSW 2847 <u>Email</u>: community@energyaustraliansw.com.au Any complaints to EnergyAustralia NSW go via the switchboard, or through email or mail and are then redirected to the appropriate area of EnergyAustralia NSW operations. All complaints are recorded in the Ellipse system in the Incidents and Complaints Register with all details captured including actions to be taken if necessary as per Environment Management System Administration Procedure for non-conformity, corrective and preventative action. If actions were necessary, a review of those actions is undertaken before the work order is closed. In addition, the ash contractors produce a monthly compliance report including a record of any complaints received. https://www.energyaustralia.com.au/about-us/energy-generation/lamberts-north-ash-repository
		O	<ul style="list-style-type: none"> Observation: consider adding link from https://www.energyaustralia.com.au/about-us/energy-generation/lamberts-north-ash-repository page to the contact details published on https://www.energyaustralia.com.au/about-us/energy-generation/mt-piper-power-station
		O	<ul style="list-style-type: none"> Observation: In next AMER, update following in Appendix A: <ul style="list-style-type: none"> - email contact details to: community@energyaustraliansw.com.au - additional phone contact details to: or 1800 756 968
B13	Community Information Plan.	C	<ul style="list-style-type: none"> Internal audit (Communication) conducted by Coleen Milroy and Kyle Brown Aug-2016. The <i>Lamberts North Ash Placement Stakeholder Communications Plan</i> (September 2012) prepared and implemented: <ul style="list-style-type: none"> - specifically prepared and implemented for the purposes of this project. - Community Information Plan (CIP) was also prepared in October 2013. - The CIP was published in the local newspaper Lithgow Mercury 08 December 2012.

Lamberts North Ash Repository – Conditions of Approval – Schedules 2		Finding	Comments / Evidence
			<ul style="list-style-type: none"> - The CIP was updated to reflect EnergyAustralia (EA) as the owners and remove any references to Delta Electricity in accordance with a recommendation from the Independent Environmental Audit (Aurecon, 2013).
B14	Design.	C	<ul style="list-style-type: none"> • Design approved by DP&E 01 December 2012. • The ash placement areas were designed by JK Williams (https://www.jkw.com.au/lamberts-north/), in consultation with Principal Contractors Lend Lease, to ensure structural stability of the ash placement areas. The ash placement areas were constructed in line with the design.
Part C – During Construction Conditions			
C1- C2	Environmental Incident Reporting.	NA	<ul style="list-style-type: none"> • No construction activities currently underway.
C3- C5	Construction Hours.	NA	<ul style="list-style-type: none"> • No construction activities currently underway.
C6	Construction Noise.	NA	<ul style="list-style-type: none"> • No construction activities currently underway.
C7	Dust Generation.	NA	<ul style="list-style-type: none"> • No construction activities currently underway.
C8- C9	Heritage Impacts.	NA	<ul style="list-style-type: none"> • No construction activities currently underway.
C10- C13	Soil and Water Quality Impacts.	NA	<ul style="list-style-type: none"> • No construction activities currently underway.
C14- C16	Waster Generation and Management.	NA	<ul style="list-style-type: none"> • No construction activities currently underway.
Part D – Prior to Operation Conditions			
Ash Management			
D1	The Proponent shall prepare a long-term ash management strategy including a program for investigation and assessment of alternative ash management measures with a goal of 40% reuse of ash by 31 December 2020. The report shall be submitted to the Director-General six months prior to the commencement of operations. The Proponent shall report on the status and outcomes of its investigations to the Director-General every two years from the commencement	C	<ul style="list-style-type: none"> • Lamberts North Consistency Report and Ash Management Strategy prepared and approved: <ul style="list-style-type: none"> - prepared by SKM (2012) and DMC (2010) respectively. - approved by DPI 30 July 2012 detailing the long-term ash management strategy for ash re-use. - https://www.energyaustralia.com.au/sites/default/files/2017-03/Ash%20Management%20Strategy.pdf

Lamberts North Ash Repository – Conditions of Approval – Schedules 2		Finding	Comments / Evidence
	of the operation of the project, unless otherwise agreed by the Director-General.		
Operational Environmental Management Plan			
D2	OEMP.	C	<ul style="list-style-type: none"> The Operation Environmental Management Plan prepared and approved: <ul style="list-style-type: none"> prepared by CDM Smith 2013. approved by DPI in May 2013. operations at Lamberts North commenced in September 2013.
D3	OEMP plans: (a) Operational Noise Management Plan. (b) Groundwater Management Plan. (c) Soil and Surface Water Management Plan. (d) Air Quality Management Plan. (e) Landscape/Revegetation Plan. (f) Site Rehabilitation Management Plan.	C	<ul style="list-style-type: none"> OEMP contains the following plans: <ul style="list-style-type: none"> The Operation Environmental Management Plan was prepared by CDM Smith. Sections 6.3 – 6.7 detail the required management plans. It is noted that (e) and (f) are combined into a single Landscape Revegetation and Rehabilitation Plan. Approval of the OEMP was granted in May 2013 and operations at Lamberts North commenced in September 2013.
		O	<ul style="list-style-type: none"> Observation: CoA conditions D3e Landscape/Revegetation Plan and D3f Site Rehabilitation Management Plan not previously internally audited, therefore consider including these areas of OEMP in future audit schedules.
D4	Groundwater Quality and Geotechnical Impacts.	NA	<ul style="list-style-type: none"> Internal audit (groundwater quality) conducted by Coleen Milroy and Antony Nolan Aug-2017. 2016-17 AEMR commentary included: <ul style="list-style-type: none"> Evaluation of groundwater levels at Lamberts North (CDM, 2012) was provided to DPI May 2013. Groundwater level evaluation report demonstrated that the activities associated with preparation and re-profiling of Lamberts North area had minimal impact on groundwater levels on and immediately adjacent to the site.
		O	<ul style="list-style-type: none"> Observation: Geotechnical Impacts not previously internally audited, therefore consider including this area of OEMP in future audit schedules.
Part E – During Operation Conditions			
E1- E6	Operational Hours.	NA	<ul style="list-style-type: none"> 2016-17 AEMR commentary included: <ul style="list-style-type: none"> Lend Lease have advised that no operational activities have taken place outside the hours designated above. Ash haul truck logs support this statement.
		O	<ul style="list-style-type: none"> Observation: during next site visit/internal audit, ground-truth sample of ash haul truck logs.
E7- E10	Operational Noise.	NA	<ul style="list-style-type: none"> Internal audit conducted by Coleen Milroy and Antony Nolan Aug-2017. 2016-17 AEMR commentary included: <ul style="list-style-type: none"> noise criteria included in Table 6-4 of the approved OEMP.

Lamberts North Ash Repository – Conditions of Approval – Schedules 2		Finding	Comments / Evidence
			<ul style="list-style-type: none"> - meteorological conditions to which the above criteria apply are included in Section 6.3.5.3 of the approved OEMP. - compliance addressed in section 6.3.5.4 of the approved OEMP and reported in AEMR. - The plant and equipment mitigation measures are included in Table 6-3 of the approved OEMP. No noise complaints have been received for Lamberts North within the reporting period.
E11	Operational Noise Review.	NA	<ul style="list-style-type: none"> • Internal audit conducted by Coleen Milroy and Antony Nolan Aug-2017. • 2016-17 AEMR commentary included: <ul style="list-style-type: none"> - Operation Noise Review Report prepared in October 2013 by Aurecon. - Report submitted to the DPI on 9th October 2013 and the EPA 10th October 2013 for review. The report concluded that the noise resulting from Lamberts North operations comply with the criteria specified in condition E7 at the representative residential receivers at Location 1 and Location 2. - No complaints regarding noise from Lamberts North have been recorded during the reporting period.
E12- E14	Ongoing Operational Noise Monitoring.	NA	<ul style="list-style-type: none"> • Internal audit conducted by Coleen Milroy and Antony Nolan Aug-2017. • 2016-17 AEMR commentary included: <ul style="list-style-type: none"> - Operational noise monitoring program included in Table 6-5 of the approved OEMP. - Six-monthly monitoring performed during 2016-2017. - Both reports state that the noise resulting from Lamberts North operations complies with the criteria specified under condition E7 at the representative residential receivers.
E15	Groundwater Monitoring.	NA	<ul style="list-style-type: none"> • Internal audit conducted by Coleen Milroy and Antony Nolan Aug-2017. • 2016-17 AEMR commentary included: <ul style="list-style-type: none"> - Groundwater Monitoring program included as part of the Groundwater Management Plan as Section 6.4.3 of the approved OEMP. - Monitoring has been carried out on a continual monthly basis including the first 12 months of operations to establish baseline data. - Results of Groundwater monitoring during the reporting period have been addressed in AEMR and can be found in Appendix D.
E16	Surface Water Quality Monitoring.	NA	<ul style="list-style-type: none"> • Internal audit conducted by Coleen Milroy and Alicia de Vos Aug-2015. • 2016-17 AEMR commentary included: <ul style="list-style-type: none"> - Surface water monitoring programme included in Table 6.21 of the approve OEMP. - Monthly monitoring performed at the Final Holding Pond monitoring station to Neubecks Creek (LDPO1), and at NC01 and WX22. Wet weather monitoring was performed in October 2013 and March 2014.

Lamberts North Ash Repository – Conditions of Approval – Schedules 2		Finding	Comments / Evidence
			<ul style="list-style-type: none"> - Results of Surface water monitoring during the reporting period have been addressed in AEMR and can be found in Appendix D.
E17	Hydrological Monitoring Program.	NA	<ul style="list-style-type: none"> • Internal audit (Groundwater Management) conducted by Coleen Milroy and Antony Nolan Aug-2017. • 2016-17 AEMR commentary included: <ul style="list-style-type: none"> - Huons Creek filled in during construction of the Lamberts North ash placement site commenced. As such, it was not developed as a sub-surface drain as was originally proposed. - Consistency report (SKM, 2012) was submitted to the DPI on 30 July 2012. - The report states that groundwater modelling performed during construction demonstrated that the water contained within the creek was largely groundwater as a result of the Huon Void intersecting the groundwater table. - Based on this finding, the hydrological monitoring program was incorporated into the Groundwater Management Plan.
E18	Air Quality Monitoring.	NA	<ul style="list-style-type: none"> • Internal audit conducted by Coleen Milroy Oct-2015. • 2016-17 AEMR commentary included: <ul style="list-style-type: none"> - The Air Quality Monitoring Program is included in section 6.6.6 of the approved OEMP. It states that air quality monitoring will be undertaken for the life of the project. TEOM and dust gauge data has been collected monthly in the first 12 months of operation to determine whether additional monitoring stations are required as a result of the project. The results of Air Quality monitoring during the reporting period are addressed in AEMR.
E19- E20	Environmental Incident Reporting.	NA	<ul style="list-style-type: none"> • No current issues identified.
		O	<ul style="list-style-type: none"> • Observation: Environmental Incident Reporting not previously internally audited, therefore consider including this area of CoA in future audit schedules.

Lamberts North Ash Repository – Conditions of Approval – Schedules 2	Finding	Comments / Evidence
<p>E21 Annual Performance Reporting.</p> <p>The Proponent shall, throughout the life of the project, prepare and submit to the Director-General, an Annual Environmental Management Report (AEMR). The AEMR shall review the performance of the project against the Operation Environmental Management Plan (refer to condition D2 of this approval) and the conditions of this approval. The AEMR shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> (a) Details of compliance with the conditions of this approval; (b) A copy of the Complaints Register (refer to condition B11 of this approval) for the preceding twelve-month period (exclusive of personal details), and details of how these complaints were addressed and resolved; (c) Identification of any circumstances in which the environmental impacts and performance of the project during the twelve-month period have not been generally consistent with the environmental impacts and performance predicted in the documents listed under condition A1 of this approval, with details of additional mitigation measures applied to the project to address recurrence of these circumstances; 	C	<ul style="list-style-type: none"> • For life of the project, an Annual Environmental Management Report (AEMR) must be prepared and submitted to the Director-General, reviewing project performance against OEMP (condition D2) and the conditions of approval, and in 2016-17 EnergyAustralia NSW reported (https://www.energyaustralia.com.au/sites/default/files/2018-01/20180116_AEMR%20Lamberts%20North%202016-17_reviewed_final_complete.pdf): <ul style="list-style-type: none"> - A summary of compliance in Section 1, incidents and non-compliances are tabled in Section 11, and details of compliance with the conditions of approval in Appendix A; - In section 9, no community complaints received relating to the Lamberts North Ash Repository during the reporting period. It is noted that EnergyAustralia NSW maintains a 24-hour hotline for the public to report incidents, complaints or enquiries with contact details available on the EnergyAustralia website. EnergyAustralia records the details of all complaints received in a Complaints Register; - In section 6, Operational Noise Monitoring (Appendix B & C noise assessment reports), Ecological Monitoring, Air Quality Monitoring, Waste, and Heritage Management, are discussed. A summary of the environmental management measures and associated performance are provided in Table 8. - In section 7, Groundwater Monitoring Surface (including Hydrological Monitoring), and Water Quality Monitoring (Appendix D water quality report) are discussed. - In section 8, Landscape and Revegetation is discussed. - Environmental monitoring for the operations at Lamberts North Ash Placement Area designed to comply with the regulatory requirements specified in Section 3 of the AEMR (Consents, Leases, Licences and Permits), and also to provide an ongoing analysis of the condition of the environment surrounding the operations. - Environmental monitoring performed as part of the monitoring program at the sites indicated in Figure 3 (Lamberts North Monitoring Locations), and the results used as indicators of the effectiveness of the environmental controls, and as guidelines for the management and maintenance of key environmental procedures. - Detailed procedures outlining the environmental monitoring responsibilities of key stakeholders and impacts to be mitigated are found within the individual sub-plans of the OEMP. - Details regarding the environmental responsibilities, key stakeholders and impacts to be mitigated regarding construction activities are found within the CEMP. - Performance against environmental monitoring and compliance requirements provided by Lend Lease as a monthly Client Service Report and through external consultant and internal data and reports. Summaries of reports are provided in sections 6.1 – 6.6 and Appendix H.

Lamberts North Ash Repository – Conditions of Approval – Schedules 2	Finding	Comments / Evidence
<p>(d) Results of all environmental monitoring required under conditions of this approval, including interpretations and discussion by a suitable qualified person; and</p> <p>(e) A list of occasion in the twelve-month period when environmental goals/objectives/impact assessment criteria for the project have not been achieved, indicating the reason for failure to meet the criteria and the action taken to prevent recurrence of that type of failure.</p> <p>The Proponent shall submit a copy of the AEMR to the Director-General every year, with the first AEMR to be submitted no later than fourteen months after the commencement of operation of the project unless otherwise agreed by the Director-General. The Director-General may require the Proponent to address certain matters in relation to the environmental performance of the project in response to the Director-General's review of the Annual Environment Management Report. Any action required to be undertaken shall be completed within such period as the Director-General may require. The Proponent shall make copies of each AEMR available for public inspection on request. Copies of the AEMR shall be sent to the EPA and the SCA.</p>		<ul style="list-style-type: none"> - 2013-14, 2014-15, and 2016-17 AEMRs submitted annually to DG, initially by end following October, and presently, by DG agreement, by end of following November. - It is noted that the 2016-17 AEMR was originally submitted on 30 November 2017 ('20171122_AEMR Lamberts North 2016-17_reviewed.pdf'), however in a letter dated 20 December 2017, the Department required the AEMR to be resubmitted ('20180116_AEMR Lamberts North 2016-17_reviewed_final.docx', resubmitted 19 January 2018), based mainly on a number of compliance clarifications arising from internal audit findings reported. - Section 5, lists and discusses actions required from previous AEMR review/s. - 2013-14, 2014-15, and 2016-17 AEMRs available for public inspection at: https://www.energyaustralia.com.au/about-us/energy-generation/lamberts-north-ash-repository 'Annual Environmental Management Report' accordion. - Copies of the AEMR sent to the EPA and the SCA, letters and enclosed copies of AEMR: 2013-14 AEMR: SCA 29 April 2015 (A721639); EPA 29 April 2015 (A721638) 2014-15 AEMR: SCA/WNSW 10 March 2016 (A803034); EPA 10 March 2016 (A803033) 2015-16 AEMR: WNSW 12 January 2017 (A895077); EPA 12 January 2017 (A895071) 2016-17 AEMR: WNSW 30 November 2017 (A992070); EPA 30 November 2017 (A992072)
	O	<ul style="list-style-type: none"> • Observations: 2016-17 AEMR <ul style="list-style-type: none"> - signed 16 Jan 2018 version found on LAN and not in Objective. ○ Initial Submission (Nov-17) in Objective: '20171122_AEMR Lamberts North 2016-17_reviewed.pdf'. ○ Resubmission (Jan-18) on LAN: '20180116_AEMR Lamberts North 2016-17_reviewed_final.docx'. - Incorrect Object ID, and '2015-16' in some section headers.
	O	<ul style="list-style-type: none"> • Observation: Annual Performance Reporting not previously internally audited, therefore consider including this area of CoA in future audit schedules.

Lamberts North Ash Repository – Conditions of Approval – Schedules 2		Finding	Comments / Evidence
E22	<p>Independent Environmental Auditing.</p> <p>Within 12 months of commencement of operation of Lamberts North and Lamberts South and then as may be directed by the Director-General, the Proponent shall commission an independent person or team to undertake and Environmental Audit of the project. The independent person or team shall be approved by the Director-General prior to the commencement of the Audit. The Audit shall:</p> <p>(a) Be carried out in accordance with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems Auditing;</p> <p>(b) Assess compliance with the requirements of this approval, and other licences and approvals that apply to the project;</p> <p>(c) Assess the environmental performance of the project against the predictions made and conclusions drawn in the documents referred to under condition A1 of this approval;</p> <p>(d) Review the effectiveness of the environmental management of the project, including any environmental impact mitigation works; and</p> <p>(e) Review the adequacy of the Proponent’s response to any complaints made about the project</p>	C	<ul style="list-style-type: none"> • In accordance with CoA condition E22, EnergyAustralia engaged Aurecon to undertake the independent environmental audit on 2nd – 3rd September 2014. • At the Department’s request in May 2018, EnergyAustralia will engage an external party to undertake another Independent Environmental Audit, before end of June 2019.

Lamberts North Ash Repository – Conditions of Approval – Schedules 2		Finding	Comments / Evidence
	<p>identified in the Complaints Register.</p> <p>The Environmental Audit Report shall be submitted to the Director-General within two months of the completion of the Audit, detailing the findings and recommendations of the Audit and including a detailed response from the Proponent to any of the recommendations contained in the Report.</p>		
E23-E25	Waste Generation and Management.	NA	<ul style="list-style-type: none"> • Internal audit (Waste Management) conducted by Coleen Milroy and Kyle Brown Aug-2016. • 2016-17 AEMR commentary included: <ul style="list-style-type: none"> - Lend Lease utilises EnergyAustralia NSW’s waste management facilities for wastes generated in the operation of the repository, including waste oils, general waste and materials for recycling. These are stored in intermediate storage facilities at Mt Piper Power Station and routinely removed by EnergyAustralia NSW’s waste contractors. - No wastes generated outside the Lamberts North site are allowed to enter the area. - To prevent the unlawful access to the repository area, regular security patrols are conducted across the site. Both Lend Lease and EnergyAustralia NSW security personnel are required to report if they encounter wastes outside those that are allowed during routine operations. - Lend Lease provides Monthly Ash Placement Work Instructions to address all issues of routine site maintenance as part of a monthly work program. Waste management is conducted in accordance with EPA guidelines.
Part F – Post Operation Conditions			
F1	Project Completion Management Plan.	NA	<ul style="list-style-type: none"> • Project is still in operational phase.

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