



EnergyAustralia

## EnergyAustralia NSW

# Internal Audit Form

This Proforma forms part of the OHS and Environmental Management Systems of EnergyAustralia NSW and is to be used in conjunction with DES SA 001-24 OHS Auditing and EMSAP-16 Internal Audit.

### PART A – Audit Details

#### 1. BASIS & OBJECTIVES

The audit was conducted in accordance with DES SA 001-24 OHS Auditing and EMSAP-16 Internal Audit.

**System Procedure** \_\_\_\_\_

Other (provide detail): **Lamberts North Operational Environmental Management Plan (OEMP) Rev 3 May 2013 – as approved by DG DP&I**

**Note:** if a System Procedure was the audit subject, a copy should be provided as an attachment to this Audit Report.

**The audit was conducted on:**

3/07/2014

**Audit Team Leader:**

Kelly Gillen

**The audit team comprised:**  
(Audit Team Members)

Coleen Milroy

**The objectives of the audit were to:**

- Confirm EnergyAustralia NSW's level of compliance on the Lamberts North ash placement project, with a particular focus on the general OEMP document
- Confirm LendLease's level of compliance on the Lamberts North ash placement project as principal contractor for the repository, with a particular focus on the general OEMP document
- Complete inspection of site to confirm compliance with general requirements of OEMP and Project Conditions of Approval
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#### 2. SCOPE & METHODOLOGY

The scope of the audit was to assess the standard of compliance with documented requirements / procedure(s) and to make recommendations, where appropriate, to enable improved environmental performance. This internal audit was conducted as part of the internal audit program specified for EMSAP-16 Internal Audit.

The audit methodology consisted of:

- An audit "entry" meeting;
- Completion of the audit, using the Audit Checklist to record the audit findings following (*Note: checklist may be modified to suit actual audit methodology*):
  - Interviews with EnergyAustralia NSW personnel / contractors / suppliers;
  - Examination of data, records, reports and checklists;
  - Review of procedures and processes used;
  - Field Inspections.
- An audit "exit" meeting;
- Completion of the audit report.



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### PART B – Audit Checklist

3. PLANNING	
	Tick Box (✓) if Completed
Confirm audit scope, objectives and methodology.	<input checked="" type="checkbox"/>
Appoint Audit Team.	<input checked="" type="checkbox"/>
Brief audit team on audit scope, objectives and methodology.	<input checked="" type="checkbox"/>
Confirm audit timing, access requirements, personnel required, etc. with area to be audited.	<input checked="" type="checkbox"/>
Prepare audit checklist / protocols.	<input checked="" type="checkbox"/>
Review previous audit findings (if available and relevant).	N/A
4. AUDIT COMPLETION	
	Tick Box (✓) if Completed
Conduct Audit Entry meeting / record attendees.	<input checked="" type="checkbox"/>
Complete audit utilising the audit checklist / protocol documenting audit findings, evidence sighted to verify audit findings, areas inspected, personnel interviewed, records inspected, etc.	<input checked="" type="checkbox"/>
Assess the audit findings and categorise the level of compliance against the documented procedure or process – that is: "Comply" / "Non-compliance" / "Observation".	<input checked="" type="checkbox"/>
Consolidate audit findings and recommendations.	<input checked="" type="checkbox"/>
Conduct Audit Exit meeting/record attendees.	<input checked="" type="checkbox"/>
Prepare draft audit report.	<input checked="" type="checkbox"/>
EnergyAustralia NSW Manager SHE to review draft audit report prior to the report being finalised.	<input checked="" type="checkbox"/>
Finalise audit report – Lead Auditor to sign and date.	<input checked="" type="checkbox"/>
Distribute audit report, with original copy to the SHE Systems Officer, which is to include the original marked up checklists detailing the audit findings / comments.	<input checked="" type="checkbox"/>
Prepare non-conformance report including a copy of the audit recommendations as an attachment to the non-conformance form.	<input checked="" type="checkbox"/>
Enter audit recommendations into Ellipse for follow up corrective / preventative action.	<input checked="" type="checkbox"/>



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### PART C – Audit Outcomes

#### 5. FINDINGS Note: Interviewees – JA=Jane Aiken, JT=Jason Thompson, RS=Rainer Scheurer, CM=Coleen Milroy

OEMP Clause No.	Description of Clause	Interviewee	Compliance C= Comply NC = Non Compliance O = Observation	Evidence Sighted / Comments <i>(For example: Documents / Field Inspections / Records / Test Certificates, Checklists, etc.)</i>
1.6 Structure of the OEMP	To ensure the continuous improvement of the project, an annual Repository Management Plan will also be produced as a supporting document to the OEMP.	JA	C / O	Current Repository Management Plan (RMP) for 2014 sighted. Revision 8 of document dated July 2014. Also sighted previous RMP . <b><u>Refer recommendation 1.</u></b>
2.2.1 Hours of Operation	Under normal conditions, the operation of the ash placement area at Lamberts North will occur during the following hours: <input type="checkbox"/> Monday to Friday: 6am – 8pm; and <input type="checkbox"/> Saturday to Sunday: 6am – 5pm.	JA	C	Sited several daily operating sheets which include “ash start”, “ash stop” and “location” Refer form 22/06/2014.
2.2.1 Hours of Operation	CoA E2 states that operations outside the normal operation hours are only permitted in specific emergency situations. If this has occurred must: <input type="checkbox"/> Prepare and submit a report to the DG if this has occurred more than once in a 2-month period within 60 days of second event. <input type="checkbox"/> Maintain log of operations outside normal hours and notify EPA and sensitive receivers prior to emergency ashing, with written notification to DG within 7 days.	JA/RS	C	No operations noted outside hours. Noted that the requirements are not well captured in daily operating sheets. <b>**Follow up required on ashing during belt replacement works – 3 May 2014**</b> <u>Follow-up: Email from RS confirming that ashing occurred on 3 May 2014 until 11.50pm. This was during the brine in ash campaign period, and ashing occurred only in the Stage 1 area. Ref email – Obj Ref A657606</u> <b><u>Refer recommendation 2.</u></b>
2.2.3 Ash Placement	Ash placement will be defined within the perimeter embankment along the northern and eastern boundary of the site, prepared during the construction phase.	JA	C	Site inspection conducted and confirmed that ash placement has occurred generally in accordance with clause 2.2.3 of the OEMP.

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2.2.3 Ash Placement	Brine-conditioned ash will be placed above RL 946 unless further groundwater modelling indicates it can be placed at a lower level.	JA	C	At this time there is no plan to place brine conditioned ash in Lamberts North. LendLease fully aware of the requirements to place above RL 946 if required.
2.2.3 Ash Placement	The sequence of ash placement will work by initially placing ash across the site starting from the most northerly part of the Project site once construction is completed, then towards the east and south of Lamberts North.	JA	C	Site inspection conducted and confirmed that ash placement has occurred generally in accordance with clause 2.2.3 of the OEMP.
2.2.3 Ash Placement	The ash is treated to achieve an average compaction of 95%, relative to its maximum standard compaction,	JA	O	93% is reported as the requirement in LendLeases monthly reporting to EA, and this is consistent with contractual obligations. 95% is a target only. Sited Golder 6-monthly report (May 2014) which stated average compaction of 94.9%. All Golder reviews have stated 93% as a suitable compaction target (ref 2009/10 Audit by Golder – 24/3/10) <b>Refer recommendation 5.</b>
2.2.3 Ash Placement	Ash is placed in layers and stepped to produce an overall batter slope of approximately 1(V):4(H), with benches added every 10m in vertical height change	JA	C	Site inspection conducted and confirmed that ash placement has occurred generally in accordance with clause 2.2.3 of the OEMP. Note, this clause not relevant at this time.
2.2.3 Ash Placement	As each part of the ash repository meets its proposed RL level, this area is capped, and ash will then continue to be placed beside the capped area.	JA	C	Site inspection conducted and confirmed that ash placement has occurred generally in accordance with clause 2.2.3 of the OEMP. Note, this clause not relevant at this time.
2.2.4 Ash Management	Ash is controlled during placement by the use of sprinklers, water carts, and artificial dust suppressants to minimise the generation of dust of prepared and working areas, haul roads, stockpiles and working surfaces, and ultimately by capping	JA	C	Water usage monitored in monthly report to EA. Daily record of environmental monitoring (sited June form – MPSF713B  Site inspection conducted and confirmed that ash management has occurred generally in accordance with clause 2.2.4 of the OEMP.

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2.2.4 Ash Management	Testing and monitoring is also routinely undertaken, including: <input type="checkbox"/> Ash moisture content; <input type="checkbox"/> Rainfall and evaporation; <input type="checkbox"/> Water quality and volume; <input type="checkbox"/> Compaction of ash; <input type="checkbox"/> Dust; <input type="checkbox"/> Ash placement levels; <input type="checkbox"/> Rehabilitation and revegetation; <input type="checkbox"/> Engineering and geotechnical considerations (compaction and stability);	JA	C/O	Sited evidence of all testing/monitoring requirements being met and monitored as follows:  <ul style="list-style-type: none"> <li>- Monthly performance report to EA</li> <li>- Regular compaction testing by Golder</li> <li>- Mac Geotech undertake engineering/geotechnical – sited 1/7/14 and 3 samples specific for LN on 24/4/14</li> <li>- Weather station data</li> <li>- Site dust gauges</li> <li>- Surveys of rehab/reveg and general ash formation</li> </ul> <p><b><u>Refer recommendation 3 – ensure that all relevant items are included in the monthly performance report to enable tracking by all members of the Project Team.</u></b></p>
2.2.5 Water Management	A water management system will be implemented at Lamberts North to ensure that there is no adverse impact on existing surface water or groundwater conditions within and surrounding the site	JA	C	Site inspection conducted and confirmed that water management has occurred generally in accordance with clause 2.2.5 of the OEMP. Noted dirty water collection ponds and pumpback system being implemented from main pond area.
2.2.5 Water Management	Rainwater that falls on the site is captured and stored in retention ponds and used on site.	JA	C	Site inspection conducted and confirmed that water management has occurred generally in accordance with clause 2.2.5 of the OEMP and the RMP.  Note: Rainwater that falls to the exterior of the site boundary is directed around the site via the drainage diversion line.
2.2.5 Water Management	The ash repository has been designed to contain water onsite, by diverting water into the centre of the site to on-site retention and sediment basins;	JA	C	Site inspection conducted and confirmed that water management has occurred generally in accordance with clause 2.2.5 of the OEMP and the RMP.
2.2.5 Water Management	Excess runoff from the surrounding hillside during a large rain event will be captured in the drain on the south-western side boundary of the site and drained west to Mt Piper power station;	JA	C	Site inspection conducted and confirmed that water management has occurred generally in accordance with clause 2.2.5 of the OEMP and the RMP. Observed drainage line.

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3.1 Environmental Management System	The Contractor engaged to operate Lamberts North shall also manage its process responsibilities under the framework of an EMS.	JA	C	LendLease have an Environmental Management System for the site which has been certified to 14001. A comprehensive EMP with associated procedures was sited.
3.1 Environmental Management System	Contractual arrangements will be put in place to meet the performance criteria and objectives set out by this OEMP.	RS/JT	C	Contract Administrator confirmed that the standard environmental clauses are contained within contract C5131. Also confirmed that environmental KPIs and financial drivers are captured.
3.1 Environmental Management System	Every aspect of site practice is captured in documents such as the OEMP, the works Contract, and documents prepared by the Contractor such as a Repository Management Plan (RMP) which will detail all aspects of operation of the ash repository, monthly work instructions, technical specifications, and work procedures.	JA	C	OEMP and RMP considered to be relatively static documents capturing overarching operational principles and strategies. Sited daily/weekly/monthly work instructions which capture detailed site management procedures.
3.1 Environmental Management System	The RMP is updated each year to meet the criteria set out by the OEMP, while at the same time improving the design and environmental mitigation measures through a process of continuous improvement.	JA	C	OEMP and RMP considered to be relatively static documents capturing overarching operational principles and strategies – although RMP reviewed on an ongoing basis. Sited daily/weekly/monthly work instructions which capture detailed site management procedures. 6-monthly Golder reviews form basis for significant changes and improvements in site management.
3.3 Project Communication - Internal	A Project Team will be formed, comprising all Delta staff involved in the Project's operation and the site staff working under the Contractor. Although the Environmental Representative is independent from the Project Team, that person is still considered to be part of the Project Team in terms of project communications	RS	C	Project Team formed and this team meet formally on a minimum monthly basis at the monthly contract progress meeting.

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3.3.1 Project Communication - Internal	Weekly Project meetings will be held to communicate the current status of the Project to Project Team staff, including the opportunity to discuss specific issues and concerns about the Project and forthcoming activities.	RS	C	Key LendLease personnel attend daily EA operating meeting to provide updates on operation and highlight concerns. Contract Administrator in regular attendance.
3.3.1 Project Communication - Internal	Other methods of internal communication include: <ul style="list-style-type: none"> <li>▪ Tool box Meetings as required</li> <li>▪ Daily contractor site meetings</li> <li>▪ Monthly environmental compliance reports</li> </ul>	JA	C	Sited a range of communication methods including: <ul style="list-style-type: none"> <li>- Daily pre-start briefings</li> <li>- APA Team weekly team meeting</li> <li>- Weekly ash placement instruction</li> <li>- Toolbox talks and minutes</li> <li>- *All sited for the week ending 7/7/14</li> </ul>
3.3.2 Project Communication - External	External communications will be managed by Delta in line with the complaints management and community information procedures	CM	C	Complaints handled in accordance with DEP BM 022 and other communications in accordance with EMSAP 7. Note: no complaints received by EA or LendLease to date.
3.3.2 Project Communication - External	Continued communication will be maintained with the broader community for the duration of the Project, and complaints will be handled in accordance with the procedures as outlined in Section 3.5.	CM	C	Complaints handled in accordance with DEP BM 022 and other communications in accordance with EMSAP 7. Note: no complaints received by EA or LendLease to date.
3.3.2 Project Communication - External	In addition to the Community Information Plan, Delta's Management Team regularly meets on a quarterly basis, with a local community group, the Western Community Reference Group.	CM	C	Confirmed that quarterly community forum meetings are chaired by the GM and held with key stakeholders from every locality including Blackmans Flat, adjacent to LN repository. Refer agenda and minutes from previous and upcoming meeting – Obj Ref A657607/608.
3.3.2 Project Communication - External	Delta has a project webpage available on its website (www.de.com.au) relating to the Mount Piper Ash Placement Project, which will be updated prior to operation with the suitable phone numbers, including after-hours contact details.	CM	C	Delta webpage was created, maintained and updated prior to acquisition by EA. EA webpage has a portal for community complaints/incidents/queries with 24 hr contact details.

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3.3.2 Project Communication - External	Portals for community complaints and enquiries will include: <input type="checkbox"/> A 24 hour contact number; <input type="checkbox"/> A postal address to which written complaints and enquiries may be sent; and <input type="checkbox"/> An email address to which electronic complaints and enquiries may be transmitted.	CM	C	Delta webpage was created, maintained and updated prior to acquisition by EA. EA webpage has a portal for community complaints/incidents/queries with 24 hr contact details.
3.4 Environmental Training and Site Induction	Prior to commencing operation works, Delta will induct all personnel working on Lamberts North.	RS	C/O	Workers are not permitted onsite without having first completed a comprehensive site induction. It is noted that LendLease also conduct a site-specific induction for all of their own staff. <b><u>Refer recommendation 6 – Update LendLease training to ensure specific elements of LN are captured.</u></b>
3.4 Environmental Training and Site Induction	The Contractor will also implement its own approved OH&S management systems and all personnel requiring access to Lamberts North will also be inducted into these procedures.	RS/JA	C/O	Workers are not permitted onsite without having first completed a comprehensive site induction. It is noted that LendLease also conduct a site-specific induction for all of their own staff.  Current version of Health and Safety Management Plan provided by LendLease – refer Obj Ref A657609.





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3.4 Environmental Training and Site Induction	<p>The site induction process will include environmental topics relating to Project operations, with the purpose of providing sufficient education so that all personnel:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Understand their environmental obligations;</li> <li><input type="checkbox"/> Understand and comply with the OEMP and sub-plans;</li> <li><input type="checkbox"/> Understand how their role interacts with the environment and local community;</li> <li><input type="checkbox"/> Can identify potential environmental incidents and be aware of communication pathways to report such events; and</li> <li><input type="checkbox"/> Can identify the requirement to implement appropriate control measures and corrective actions.</li> </ul>	JA	C	<p>Workers are not permitted onsite without having first completed a comprehensive site induction. It is noted that LendLease also conduct a site-specific induction for all of their own staff.</p> <p><b><u>Refer recommendation 6 – Update LendLease training to ensure specific elements of LN are captured.</u></b></p>
3.4 Environmental Training and Site Induction	<p>The Contractor will identify resources for the following environmental activities:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Monitoring and inspecting site environmental controls;</li> <li><input type="checkbox"/> Developing any site-specific environmental procedures and plans (such as erosion and sediment control plans), work instructions, inspection and test plans (ITPs) and checklists;</li> <li><input type="checkbox"/> Controlling and filing documents relating to legislation, standards and environmental records; and</li> <li><input type="checkbox"/> Auditing environmental practices and controls.</li> </ul>	JA	C	<p>LendLease have an Environmental Management System for the site which has been certified to 14001. A comprehensive EMP with associated procedures was sited which includes resourcing.</p>



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3.5 Complaints Management	Delta has an existing complaints handling procedure as part of its EMS, which will be implemented during the operational phase of the project	CM	C	Complaints handled in accordance with DEP BM 022 and other communications in accordance with EMSAP 7. Note: no complaints received by EA or LendLease to date.
3.5 Complaints Management	As part of this procedure, details of complaints will be recorded in a complaints register, which will include as a minimum: <input type="checkbox"/> Date and time of the complaint; <input type="checkbox"/> Means by which the complaint was made; <input type="checkbox"/> Personal details of the complainant that were provided, or if no details were provided a note to that effect; <input type="checkbox"/> The nature of the complaint; <input type="checkbox"/> Time taking to respond to the complaint; <input type="checkbox"/> Any investigations and actions taken by Delta in relation to the complaint; <input type="checkbox"/> Any follow up contact with, and feedback from the complainant; and <input type="checkbox"/> If no action was taken by Delta in relation to the complaint, the reason/s why no action was taken.	CM	C	All complaints and enquiries which are environmental in nature are captured, tracked and reported on using EnergyAustralia's Works Management System (Ellipse) using standard job codes.
3.5 Complaints Management	The Monthly Environmental Compliance Report will document any complaints, actions and outcomes made in the reporting period.	JA	O	Provision in monthly project report for this to occur, however it is not a standing item. <b><u>Refer recommendation 3 – ensure that all relevant items are included in the monthly performance report to enable tracking by all members of the Project Team.</u></b>
3.6 Environmental Inspection Program	Daily observational monitoring of site environmental conditions and impact control measures will be undertaken by the Contractor. The Contractor will record these and take action in accordance with the requirements set out in this OEMP.	JA	C	Comprehensive daily observation sheets maintained by LendLease – includes items such as fugitive dust, rainfall etc. – Sighted example from 22/06/2014. Any issues are noted and reported to Environmental Team Leader for action. Management measures are captured via procedures and daily instructions.

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3.6 Environmental Inspection Program	Completed daily observation Checklists will be placed on the Project file and kept for auditing purposes	JA	C	Sighted example from 22/06/2014 and extensive hardcopy records maintained in contractor site office.
3.6 Environmental Inspection Program	The contractor will complete weekly environmental inspection checklists considering noise, air, water and general environmental impacts	JA	C/O	Weekly site inspection records are maintained and include environmental aspects, however a standalone environmental inspection undertaken by both EA and LL staff may be of benefit. <u>Refer template MP-SF-713G from LL EMP.</u>
3.6 Environmental Inspection Program	A site inspection report will be completed by the contractor after a significant rainfall event (>25mL/24hrs)	JA	C Commendation	Sighted rainfall site assessment form which is more rigorous than the stated requirement (triggers after 5mm/12 hours. Example 22/6/2014
3.7.1 Auditing of the OEMP - External	In accordance with CoA E22 and as part of the EMS, an audit will be conducted within 12 months of the commencement of operations. The audit will be conducted by an independent and suitably qualified person in accordance with AS/NZ ISO 19011:2003 Guidelines for Quality and/or Environmental Management Systems Auditing and Delta's ISO 14001 certified EMS.	CM	TBC	External Audit with Aurecon scheduled for August 2014.
3.7.2 Auditing of the OEMP - Internal	Six-monthly internal audits of the Contractors performance will also be undertaken in accordance with the Contractor's EMS. Internal audits will review the implementation of the OEMP and effectiveness of the management measures, and results will be reported to the Contract Administrator. An audit summary shall also be incorporated into the Monthly Environmental Compliance Report.	CM	C	This audit is the first formal internal audit of operations and compliance with the OEMP. Note that a comprehensive audit was also conducted during Construction.  Other audits have been conducted in the form of site inspections with the next inspection scheduled for 2 September 2014.

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3.8 Non compliances and corrective actions	All potential or actual non-compliant activities (non-conformances) must be brought to the attention of the Contract Administrator and the Principal's Representative.	JA/RS	C	Facilitated via EA and LLs online incident reporting forms. Any potential issues communicated immediately via CA to Enviro Rep. Provision for reporting and tracking via monthly project meetings.
3.8 Non compliances and corrective actions	All non-conformances will be recorded in the appropriate report, form, checklist, or complaints register. Corrective actions will be recorded, and the Contractor is responsible for ensuring that the necessary corrective actions are satisfactorily completed.	JA/RS	C	All incidents/non-conformances which are environmental in nature are captured, tracked and reported on using EnergyAustralia's Works Management System (Ellipse) using standard job codes.
3.8 Non compliances and corrective actions	The Director-General will be informed within 12 hours if the non-conformance is incident related	CM	C	Provision for this reporting to occur – not triggered to date.
3.9.2 Incident Response Procedure	The Contractor must communicate any environmental incident that occurs during Lamberts North operations (including near misses) to the Contract Administrator immediately.	RS	C	Facilitated via EA and LLs online incident reporting forms. Any potential issues communicated immediately via CA to Enviro Rep. Provision for reporting and tracking via monthly project meetings. Not triggered to date.
3.9.2 Incident Response Procedure	Delta will be responsible for notifying the Director-General of any environmental incident within 12 hours of becoming aware of the incident. Delta will provide full written details of the incident to the Director-General within seven days of the date on which the incident occurred, or as soon as practicable depending on the nature or severity of the incident.	CM	C	Provision for this reporting to occur – not triggered to date.



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3.9.3 Incident Investigation	All incidents will be documented, investigations conducted and action plans established in order that the event does not occur again. The Environmental Representative must be involved in the investigative process as an independent observer	CM	C	All incidents/non-conformances which are environmental in nature are captured, tracked and reported on using EnergyAustralia's Works Management System (Ellipse) using standard job codes.
3.9.4 Emergency Preparedness	The Emergency Response Plan will be included in all Project inductions, specifying the steps to be taken and the persons to contact will be highlighted in the site induction.	JA/CM	C	EA Emergency Response Procedure relayed via EA and LendLease inductions
3.9.4 Emergency Preparedness	Access to Materials Safety Data Sheet (MSDS) information will be made available at the main site office: and, where appropriate, at specific locations where specified substances are being used.	JA	C	SDSs available vi online system (similar to EA). Conducted site inspection and noted poor housekeeping in oil stores. Located in Stage 1 area but servicing LN also. <u>Refer Recommendation 4.</u>
3.10 Document Control	Project records, including Contractor records, will be maintained to provide evidence of the effective operation of this OEMP. The records will be identifiable as to the item/area concerned. Records will be filed, stored and maintained in accordance with Delta's/Contractor quality assurance procedures.	JA/RS	C	Maintained primarily via monthly project meetings, internal audits and eventually the AEMR. Both EA and LL operate under certified EMS and records are managed accordingly.



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## Internal Audit Form

### 5. FINDINGS Note: Interviewees – JA=Jane Aiken, JT=Jason Thompson, RS=Rainer Scheurer, CM=Coleen Milroy

OEMP Clause No.	Description of Clause	Interviewee	Compliance C= Comply NC = Non Compliance O = Observation	Evidence Sighted / Comments <i>(For example: Documents / Field Inspections / Records / Test Certificates, Checklists, etc.)</i>
3.11 Continuous Improvement and Adaptive Management	To ensure the measures being implemented on site are relevant and effective in their implementation, management review meetings will be undertaken on a regular basis (where required). Meeting attendees will include (as a minimum) Delta (Principal's Representative), Contract Administrator, and nominated personnel from the Contractor. The Environmental Representative may also attend. A record of the meeting will be documented as minutes and maintained by the Contractor.	JA	C	Facilitated via monthly contract progress meeting. Includes identification of upcoming issues, changes in procedures etc. Attendees include contract administrator, external plant TL, environment rep or environment team member and key personnel from LendLease.
4.2 Environmental Risk Assessment	The contractor, in consultation with Delta, will continually review the potential for an impact to cause harm, and maintain a risk assessment register.	JA	C/O	Risk register maintained as appendix to EMP, however this document requires update and should be reviewed to ensure that all Lamberts North aspects and impacts. <u>Refer recommendation 3.2</u>
4.2 Environmental Risk Assessment	The OEMP sets out the likelihood and consequence assessments to be used, as well as the risk matrix. *Check whether adopted*	JA	C	LendLease risk register has adopted a matrix which generally aligns with the OEMP matrix.
4.3 Aspects and Impacts Register	The contractor will develop and reference an Environmental Aspects and Impacts register. Controls identified to minimise and mitigate risk shall be implemented in association with the Repository Management Plan.	JA	C	Appendix 3A of EMP. Review of controls suggested indicate that all are either in place or proposed in the near future.

Authorised by: Manager SHE, EnergyAustralia NSW

Date of Original Approval: To be approved

Date of this Revision: 1/07/2014

Control Status: Uncontrolled in hardcopy. Valid for the day of print only. Please ensure document version is valid before use.

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## Internal Audit Form

**5. FINDINGS** Note: Interviewees – JA=Jane Aiken, JT=Jason Thompson, RS=Rainer Scheurer, CM=Coleen Milroy

OEMP Clause No.	Description of Clause	Interviewee	Compliance <i>C= Comply</i> <i>NC = Non Compliance</i> <i>O = Observation</i>	Evidence Sighted / Comments <i>(For example: Documents / Field Inspections / Records / Test Certificates, Checklists, etc.)</i>
5.2 Environmental Monitoring Plan	The routine environmental monitoring requirements include: <ul style="list-style-type: none"> <li>▪ One operational noise review within 60 days of operations commencing</li> <li>▪ Ongoing 6-monthly noise monitoring</li> <li>▪ Monthly groundwater monitoring</li> <li>▪ Monthly surface water monitoring</li> <li>▪ 6-monthly aquatic ecology monitoring</li> <li>▪ Monthly dust/AQ monitoring</li> </ul> *Note: Environmental monitoring sub-plans to form basis of next internal audit.	CM	C	All monitoring events completed as tracked in Compliance Tracking Program. No exceedences noted to date.



### 6. RECOMMENDATIONS

<p><b>1</b> (OEMP Clause 3.1)</p>	<p><b>Ensure that the Repository Management Plan continues to be reviewed/updated on an annual basis:</b></p> <ul style="list-style-type: none"> <li>- The OEMP states that the RMP must be updated on an annual basis. It is noted that the RMP is not typically managed in this fashion, but rather is amended as required and to reflect significant variations in</li> <li>- In consideration of the above, suggest that a <b>review</b> of the document and its adequacy is undertaken at least annually.</li> <li>- Previously approved RMP dated 6/03/2012, current (draft) revision #8 of RMP dated July 2014. Note that finalisation is required to capture new water management processes.</li> </ul>
<p><b>2</b> (OEMP Clause 2.2.1)</p>	<p><b>Amend procedures and/or daily operations form to highlight notification/reporting requirements if operations at Lamberts North occur outside approved hours:</b></p> <ul style="list-style-type: none"> <li>- Operations outside normal hours trigger a range of complex notification and reporting requirements to EANSW ER, Contract Administrator, EPA, Director General etc.</li> <li>- Although this reporting requirement has not been triggered to date, evidence was not sighted to indicate that these requirements are captured/documented</li> </ul>
<p><b>3.1</b> (OEMP Clause 3.5)</p>	<p><b>Include additional environmental items in Monthly LendLease – EANSW Contract Meeting:</b></p> <ul style="list-style-type: none"> <li>- Complaints and/or enquiries received directly by LendLease and any actions and outcomes reached</li> </ul>
<p><b>3.2</b> (OEMP Clauses 4.2/4.3)</p>	<p><b>Review/Update Appendix 3, Table A of LendLease Environmental Management Plan to incorporate environmental aspects as relevant to Lamberts North:</b></p> <ul style="list-style-type: none"> <li>- Last update of aspects and impacts appears to have been 30/01/2013 (per document version history).</li> <li>- Lamberts North operations should be reviewed to ensure that the risks captured in the aspects and impacts table are up to date and relevant to LN APA.</li> </ul>
<p><b>4</b> (OEMP Clause 3.9.4)</p>	<p><b>Review storage of Dangerous Goods, Hazardous substances etc:</b></p> <ul style="list-style-type: none"> <li>- It is noted that the diesel refuelling facility and banded storage shed are located in the Stage 1 area, however they also service vehicles working at Lamberts North.</li> <li>- When reviewing availability of MSDS's it was noted that the bund around the diesel refuelling tank had a significant level of water present, and housekeeping in the banded shed area needed attention.</li> </ul>
<p><b>5</b> (OEMP Clause 2.2.3)</p>	<p><b>Revisit compaction targets:</b></p> <ul style="list-style-type: none"> <li>- OEMP states a compaction target of 95% relative to maximum standard compaction</li> <li>- The monthly LendLease – EANSW Contract Meeting environmental report states a target of 93%</li> <li>- Actual compaction figures (ref Golder 6-monthly report, May 2014) demonstrate an average compaction of 94.9%</li> </ul>
<p><b>6</b> (OEMP Clause 4.4)</p>	<p><b>Update LendLease Induction Training:</b></p> <ul style="list-style-type: none"> <li>- Ensure that project-specific induction training encompasses operations in the Lamberts North ash placement area.</li> </ul>





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## Internal Audit Form

### PART D – Close-Out

#### 7. ATTACHMENTS

The following documents are attached (*strike through those that do not apply*):

- ~~1. Copy of the procedure(s) audited~~
- ~~2. Interview notes~~
- ~~3. Records / Evidence of compliance~~
- 4. Attachments filed in Objective – references throughout.
- 5. ....
- 6. ....

#### 8. NON-CONFORMANCE REPORT

Based on the findings of this audit, has a Non-Conformance been raised?

Yes ~~/~~ No  
Work Order #

If Yes – description of Non-Conformance:

.....  
No non-conformances, however 6 observations / recommendations were made and these have  
.....  
Been entered into Ellipse as a standard ENVAUD work order  
.....  
.....

#### 9. FOLLOW-UP AUDIT

Recommendation concerning the requirement for a follow up audit to confirm that the corrective / preventative action taken has been effective in addressing the observations / non conformances identified –

Yes ~~/~~ No  
Next internal audit to include followup and review

If "Yes", date recommended for follow up audit:            30/09/2014

#### 10. AUTHORISATION

This audit report is authorised by:

Print Name:     Kelly Gillen            Signed: Via Objective                            Date: 1/09/2014  
**(Lead Auditor)**

#### 11. AUDIT REPORT DISTRIBUTION

The original copy of this Audit Report has been provided to the SHE Systems Officer.

Yes ~~/~~ No

Copies of the Audit Report has been distributed to:

- Environment Manager
- Contract Administrator