



9 February 2021

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Boral Berrima Cement Works Kiln 6 Upgrade (DA 401-11-2002-i) Triennial Independent Environmental Audit

Please find attached the final audit report prepared by Robert Byrnes from International Environmental Consultants finalised on 3 February 2021. This audit was undertaken as per condition 4.5 of DA401-11-2002i and condition 3.3 of DA85-4-2005i.

Boral has reviewed the audit report and believes it has complied with the requirements of the audit conditions.

The audit identified 5 non-compliances through the 3-year period which related to Condition 1.6, which is a general condition requiring the operations meet all other statutory obligations. These non-compliances all related to reported non-compliances to the EPA under EPL 1698 which were all appropriately reported and addressed at the time. These are outlined in Table 3.1 of the audit report and reproduced below.

Table 3.1 – Compliance Status Summary

| Instrument | Condition | Year of Non-Compliance | Details |
|-------------------|------------------|-------------------------------|--|
| DA401-11-2002i | 1.6 | 2019, 2020 | Five Non-compliances with EPL conditions in relation to monitoring and emissions (as outlined in below) |
| EPL1698 | L3.3 | 2018 | Cadmium and Thallium exceedance of limits |
| | L3.3 | 2018 | Solid particles exceedance of limits |
| | L3.3 | 2018 | Hydrogen Chloride exceedance of limits |
| | M2.2 | 2019 | HVAS failure to run on 4 occasions |
| | O2.1 | 2019 | Failure of bag house filtration system resulting in excessive dust emissions. EPA infringement notice issued |

The 2018 non-compliances were during the Solid Waste Derived Fuels Proof of Performance Trials, were of short duration and addressed at the time as part of the commissioning process.

Regarding the HVAS failure, as per the EPL the HVAS it is required to run every 6 days. On occasion it can fail to run due to power interruptions, programming failures or equipment failure. During the reporting period of 2019 this occurred on four occasions. These instances were beyond the control of the site. As a corrective action the site undertakes additional testing to make up for missed events. To reflect this approach the site Air Quality Management Plan was updated in June 2020 with the following:

'As with any type of monitoring equipment there is potential for failure to run. Should a sample not be collected due to equipment error and unintentional human error, this would not be considered a non-compliant event and an additional day will be added to make up for the missed sample.'

The baghouse failure incident resulted in a Penalty Infringement of \$15000. Boral addressed this issue at the time of the event. The community were appropriately consulted, improvements made to the baghouse and a real-time dust monitor installed along with the implementation of a Trigger Action Response Plan (TARP) to reduce the risk of dust emissions on the community of New Berrima.

The audit identified the following recommendations:

- 1) Consideration should be given to either amalgamating the two current consents as they both have elements that overlap or updating the Cement Mill 7 consent to align with DA 401-11-2002-i-MOD12
- 2) The noise assessment criteria contained in the Cement Mill 7 Consent DA 401-11- 2002-I needs to be updated to align with the EPL and DA 401-11-2002-i-MOD12.
- 3) Bank erosion on the main batter slopes of the shale quarry should be corrected and the drainage system on the banks re-established.
- 4) Seek approval from Wingecarribee Shire Council to reinstate the truck warning signage on Taylor Road.

Boral takes on these recommendations, makes the following comments and proposes to undertake the following to address the recommendations.

- Cement Mill 7 consent alignment – Boral will request a Modification to the current noise condition to align to DA 401-11-2002-I and EPL 1698. We will aim to undertake this by August 2021.
- Bank erosion on main batter – this is an ongoing maintenance issue and will continually be addressed operationally as required.
- Signage – Truck warning. Boral will request the Council to reinstate truck warning signage on Taylor Avenue. A request will be undertaken by the end of February 2021

If you require any further information, please feel free to contact me via email or on 0401 893 420.

Regards



Greg Johnson

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Boral Cement**
