

Appendix I – 2020 AEMR – Actions Completed from Previous Reviews.

No.	Name of Review	Action Required	Requested by	Action taken by the Operator
1	Annual Environmental Management Report 2015	Air Emissions - Over-fired air system	EPA	Completed
2	Envirorisk External Audit 2015	Include licence renewals and reporting obligations within Risk Manager compliance system	Envirorisk	Completed.
3	Envirorisk External Audit 2015	Review the 'Blueframe' treatment plant areas and upgrade to comply with AS 2843.1 & .2 as detailed in Table E1 of Envirorisk report	Envirorisk	Completed. Process has now been updated where applicable.
4	Envirorisk External Audit 2015	Improve boiler operation to bring particulate emissions to 250 mg/m3.	Envirorisk	Completed
5	Envirorisk External Audit 2015	Update the EMP/ WMP	Envirorisk	Completed.
6	Envirorisk External Audit 2015	Remove sawdust off the fuel shed roof and repair any conduit leaks or roof gaps.	Envirorisk	Completed on the day.
7	Envirorisk External Audit 2015	Advise all residue truck drivers and contractors of the requirement to cover their loads prior to site departure.	Envirorisk	Completed.
8	Annual Return	Error on EPA annual return pro-forma. Confusion between gas density and molecular weight units.	HPP	Error reported to EPA Bathurst. Completed, see EPA Variation Notice 1567059 dated 13 July 2018.
9	External Audit 2019	Prior to purchasing timber chip for boiler fuel, have the Environmental Advisor sign off it is fit for purpose and contains no hazardous materials e.g., treated painted or engineered timber, impurities (metals, plastics), etc.	EnviroRisk	Completed.
10	External Audit 2019	Seek DPE approval of the current version of the Waste Management Plan.	HPP	Completed
11	External Audit 2019	Prepare a Landscape Management Plan and provide to the D-G for approval.	EnviroRisk	Completed – update early 2021.
12	External Audit 2019	HPP consider aligning the AEMR and EPA Licence Annual Return to avert the doubling reproduction of some data.	EnviroRisk	Assessed. Requires consent (DA) modification.

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13	External Audit 2019	Develop a system for management and control of H2 waste including operator training to ensure treated Bifenthrin timbers do not enter the boiler fuel waste re-use stream. (This may alter if permission is granted by EPA to burn bifenthrin treated timber following a proof of destruction testing program). There may be options to re-use these residues as a beneficial re-use, e.g., fuel, MDF.	EnviroRisk	Completed
	External Audit 2019	<p>a) Undertake testing to correlate the Opacity meter with particulate emission levels such that it can be used as both a compliance device and a control tool for boiler operators to regulate fuel/ air mix and overfire air controls.</p> <p>b) Set out an SOP such that operators may be trained in the use of the opacity monitoring system to maximise boiler combustion efficiency.</p>	EnviroRisk	Completed
	External Audit 2019	Develop a new SOP capturing control over treated timber required including movement of liquid residues and empty container labelling and storage. Train all relevant operators in the SOP.	EnviroRisk	Completed as part of the Waste Management Plan.
	External Audit 2019	Verify and hold documentation that the contractors transporting treated timber waste are Licenced.	EnviroRisk	Completed.
	External Audit 2019	Make sure all operators have access to chemical SDS data via an on-line system as some chemical information was not available in hard copy at stations.	EnviroRisk	Completed. SDS are now maintained in the shift leader's office.

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	External Audit 2019	<p>a) Investigate scope for burning bark within the boiler furnace to replace purchased fuel needs from off-site, provide sale options for a quantity of the chipped timber and therefore a net financial benefit to site operations.</p> <p>b) A procedure to optimise combustion efficiency controls to ensure air discharge compliance will need to pre-date any change to fuel use.</p>	EnviroRisk	Investigated. Not considered viable given the saleable value and calorific value of bark. Introduction of clinker (silica from soils in bark melting) will adversely affect the plant operations.
	External Audit 2019	Complete a review of site generated waste to evaluate beneficial re-use opportunities as opposed to landfill.	EnviroRisk	Partially completed. H2 timber currently sent to borg under resource recovery framework. Ash currently under review.
	External Audit 2019	Investigate feasibility of a bark hammer mill with payback against fuel purchase, grate replacement, downtime and sale of existing dry material (chip).	EnviroRisk	Completed. Not a viable option given the cost of hammer mill, impacts of burning bark and generation of clinker in the boiler fire box. The site will not pursue the option.
	External Audit 2019	Assess beneficial re-use opportunities for ash as opposed to landfill disposal.	EnviroRisk	Under investigation. Delivery 2021 subject to reg. approval.