



Annual Audit Compliance Report form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L4533/1967/15	Licence file number:	5/000597
Company name:	Cockburn Cement Limited		
Trading as:	Cockburn Cement Limited		
ACN:	008 673 470		
Registered Address:	Level 1, 157 Grenfell Street. Adelaide SA 5000		
Reporting period:	01 / 01 / 2016 to 31 / 12 / 2016		

Section B – Statement of Compliance with Licence Conditions	
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)	
<input type="checkbox"/> Yes – please sign the declaration in Section C	
<input checked="" type="checkbox"/> No – please sign the declaration in Section C and proceed to Section D	

Section C – Declaration			
I/We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular ¹ . I/We consent to the Annual Audit Compliance Report being published on the Department of Environment Regulation's (DER) website.			
Signature:		Signature:	
Name: (printed)	Brad Lemmon	Name: (printed)	Marcus Clayton
Position:	Director	Position:	Company Secretary
Seal (if signing under seal):			

AACRs can only be signed by the licensee or an authorised person with the legal authority to sign on behalf of the licensee.

¹ It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

Section D – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licensee was non-compliant at a time during the reporting period.			
Condition no:	43	Date(s) of non-compliance:	January, February, April, May, July, August and September 2016
Details of non-compliance:			
<p>Kiln 5 did not meet licence requirements for monthly CEMS data availability for:</p> <ul style="list-style-type: none"> ▪ NOx: January 2016 (77%); April 2016 (87%) and August 2016 (79%) ▪ SO2: January 2016 (73%); February 2016 (89%); May 2016 (89%); July 2016 (86%) and September 2016 (89%). <p>Kiln 6 did not meet licence requirements for monthly CEMS data availability for:</p> <ul style="list-style-type: none"> ▪ NOx: May 2016 (81%) ▪ SO2: May 2016 (80%) <p>Kiln 5 did not meet licence requirements for annual CEMS data availability for:</p> <ul style="list-style-type: none"> ▪ NOx (94%) ▪ SO2 (91%) 			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No evidence of environmental impact.			
Cause (or suspected cause) of non-compliance:			
<ul style="list-style-type: none"> ▪ Probe controller faults. ▪ Data out of control due to calibration drift outside of limits. ▪ Analyser failures. ▪ Calibration Gas bottle pressure 			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<ul style="list-style-type: none"> ▪ Probe controller faults - Vacuum pump replacement and weekly check sheet amended to monitor vacuum pressure to identify wearing pumps prior to their complete failure. ▪ Data out of control due to calibration drift outside limits - Calibration gas bottles were relocated external to the analyser panel following a regulator issue on K5 system when the panel door was closed. A 'Calibration gas bottle replacement' procedure was developed and site team members were trained by Ecotech in this procedure. ▪ Analyser failures - Critical spares are now available on site to minimise down time associated with analyser failures. ▪ Consideration of replacement options for CEMS units. 			
Was this non-compliance previously reported to DER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DER in writing		Date: CEMS data availability reported on the 21 st day of every month to DER.	

Section D – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licensee was non-compliant at a time during the reporting period.			
Condition no:	44	Date(s) of non-compliance:	Monthly
Details of non-compliance:			
<p>Monitoring Site T was not monitored in 2016.</p> <p>Groundwater pH profiling was not undertaken at Monitoring Site MB1.</p> <p>Monitoring Site G was not monitored in May 2016.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>No evidence of any environmental impact.</p> <p>Please refer to CCL Annual Groundwater Report, submitted to DER on 01/04/2016, for map).</p>			
Cause (or suspected cause) of non-compliance:			
<p>Monitoring Site T was accidentally destroyed by bulldozer in 2010.</p> <p>Monitoring Site MB1 is partially blocked preventing the access of a pH monitoring probe.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>No action required as no evidence of any adverse effects.</p> <p>Monitoring Site T is in close proximity to several other monitoring sites therefore the reinstallation of this bore would not benefit the monitoring program and is not recommended.</p> <p>Monitoring Site MB1, pH is not a critical parameter in this area, therefore the reinstallation of the bore would not benefit the monitoring program and is not recommended. The pH in that area is effectively monitored by the surrounding bores A, C, I2, MB2, etc.</p> <p>Previous report made on planned installation of a bore between the shell sand stockpile and the Beeliar residential area, to the north by June 2016. Following direction from the Department of Water, Bore I2 was installed north west of Bore A, between the shell sand stockpile and the western premises boundary, as a replacement to Bore I.</p>			
Was this non-compliance previously reported to DER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DER verbally		Date: 02 / 06 / 2015 (2015 Annual Compliance Inspection) and 22 / 12 / 2015 (meeting with CCL Munster Licencing Officer Lauren Trott.	
<input checked="" type="checkbox"/> Reported to DER in writing		Date: 26 / 11 / 2015	

Section D – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licensee was non-compliant at a time during the reporting period.			
Condition no:	6	Date(s) of non-compliance:	7 December 2016
Details of non-compliance:			
A community complaint received on 6 th of December 2016 was not recorded on electronic tracking system until 7 th of December. This complaint was not captured in the Weekly Summary Reports published on Cockburn Cement's Community website in the morning of the 7 th of December. The complaint was not received via CCL's community hot line number.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact, an administrative error.			
Cause (or suspected cause) of non-compliance:			
A delayed data entry into the electronic system of a call received in the Control Room rather than the Community Hotline.			
Reporting data downloaded for the period 02/11/16 to 06/12/16 did not capture the above mentioned complaint due to late entry. Thus, not reported in the Weekly Summaries published on the CCL Community website for the reporting period.			
The following reporting period 07/12/16 to 03/01/17 failed to identify the missing record as it fell outside the reporting filter range. Complaint reported as part of Annual Environmental Report for the 2016 calendar period.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<ul style="list-style-type: none"> ▪ CCL will enhance its internal preparatory work and prepare Weekly Summaries on a weekly basis in preparation for publication at end of month. ▪ HSE Compliance Coordinator to review Weekly Summaries for such record overlap and tally against the total monthly complaints. 			
Was this non-compliance previously reported to DER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DER verbally		Date: 24 / 02 / 17	
<input type="checkbox"/> Reported to DER in writing		Date:	

Section D – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licensee was non-compliant at a time during the reporting period.			
Condition no:	55	Date(s) of non-compliance:	23 / 12 / 2016
Details of non-compliance:			
Quarter 4 Stack Testing Report was not submitted by 21 st of December 2016 as stipulated by Licence condition. Report submitted on 24 th of January 2017.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
Stack testing was completed. No environmental impact, an administrative error.			
Cause (or suspected cause) of non-compliance:			
Staff movement in December, with EHS Advisor's departure and Process Engineer responsible for collating data on annual leave. In the absence of these staff, wrongly assumed that the quarter referred to Oct to Dec period rather than Sept to Nov period.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Internal reporting system documented including: <ul style="list-style-type: none"> ▪ Compliance Reporting Procedure update with specific reporting requirements and responsibilities. ▪ Electronic reminders to all responsible persons with itemised requirements for each specific period. ▪ Development of compliance audit checklist for each reporting period as a checkpoint (in progress). ▪ 			
Was this non-compliance previously reported to DER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DER verbally		Date: 24 / 02 / 2017	
<input type="checkbox"/> Reported to DER in writing		Date:	