



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

Once completed, please submit this form either via email to info@dwer.wa.gov.au, or to the below postal address:

Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919

Section A – Licence details

Licence number:	L4533/1967/15	Licence file number:	DER2015/000597
Licence holder name:	Cockburn Cement Limited		
Trading as:	Cockburn Cement Limited		
ACN:	008 673 470		
Registered business address:	Level 1, 157 Grenfell Street. Adelaide SA 5000		
Reporting period:	01 / 01 / 2019 to 31 / 12 / 2019		

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)

☐ Yes – please complete:

- section C;
- section D (if required); and
- sign the declaration in Section F.

☒ No – please complete:

- section C;
- section D (if required);
- section E; and
- sign the declaration in Section F.

Section C – Statement of actual production

Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.

Prescribed premises category	Actual production quantity
Category 43 – Cement or lime manufacturing	<2,400,000 Tonnes
Category 12 – Screening etc. of material	<1,000,000Tonnes
Category 61A – Solid waste facility	<5,000 Tonnes
Category 63 – Class I inert landfill	<247,500 Tonnes

Section D – Statement of actual Part 2 waste discharge quantity

Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.

Prescribed premises category	Actual Part 2 waste discharge quantity
Not applicable	Not applicable

Section E – Details of non-compliance with licence condition

Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.

Condition no:	7	Date(s) of non-compliance:	January, February, April, May, June, October and November.
Details of non-compliance:			
Kiln	Parameter	Month	Data Availability %
5	NOx	October	64
5	NOx	November	78
6	NOx	January	85
6	NOx	February	66
6	NOx	April	66
6	NOx	May	89
6	NOx	June	89
6	NOx	October	80
6	SO ₂	November	76
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No evidence of any environmental impact.			
Cause (or suspected cause) of non-compliance:			
<p>NOx - unstable spans, dilution probe issues. Overnight calibrations outside acceptable limit.</p> <p>SO₂ – probe controller fault, instability following power failure. Scheduled instrument maintenance.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Rebuilt dilution probe.</p> <p>NOx analyser replaced.</p> <p>Gas cylinder replaced.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 28/02/19, 27/03/19, 28/05/19, 28/06/19, 28/07/19, 20/11/19 and 28/12/19	

Condition no:	13	Date(s) of non-compliance:	14/02/19, 08/03/19, 04/04/19, 08/04/19, 03/11/19, and 24/11/19
Details of non-compliance:			
Kiln	Date	Description	
5	14/02/19	Not available for scheduled stack testing due to kiln availability	
5	08/03/19	Not available for scheduled stack testing due to kiln availability	
6	03/04/19	Not available for scheduled stack testing due to kiln availability	
5 & 6	08/04/19	Not available for scheduled stack testing due to kiln availability	
6	03/11/19	Not available for scheduled stack testing due to kiln availability	
6	24/11/19	Not available for scheduled stack testing due to kiln availability	
5	05/12/19	Not available for scheduled stack testing due to kiln availability	
5	13/12/19	Not available for scheduled stack testing due to kiln availability	
5	20/12/19	Not available for scheduled stack testing due to kiln availability	
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 any environmental impact.			
Cause (or suspected cause) of non-compliance:			
Kiln downtime due to maintenance repairs and scheduled production downtime.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
No action required.			
In a meeting with DWER Officers on 1 May 2019, CCL advised of Kiln's unavailability due to scheduled maintenance, wash downs and scheduled downtime due to full stock levels.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DWER verbally		Date: 01 / 05 / 2019	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 27/03/2019, 28/04/2019, 28/05/2019, 28/12/2019 & 28/01/2020	

Condition no:	17	Date(s) of non-compliance:	January
Details of non-compliance:			
As reported in 2019's AACR submission, real time CEMS data available on the Cockburn Cement Limited Website failed to update from June 2018 to January 2019.			
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.			
CEMS data is downloaded and reported to DWER on a monthly basis in accordance with EP Licence Condition 45. As reported in 2019's AACR submission, we confirm that there was no actual loss of data, nor discharge limit exceedances. This incident was limited to the failure of data upload from the CEMS to the website due to a file transfer protocol failure, resulting from the change of the website hosting server.			
Cause (or suspected cause) of non-compliance:			
Data transfer failure between CCL's Kiln 5 and Kiln 6 CEMS and the CCL Community Website.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
No evidence of any adverse effects. The following improvements were actions to prevent recurrence of the non-compliance: <ol style="list-style-type: none"> 1. KPI's and Service Level Agreements with website host service provider. 2. Uptime report with integrated alarms for the early notification of data transfer failure; and 3. Robust assurance process for all public data required by Licence requirements. 			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DWER verbally		Date: 18 / 01 / 2019	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 25 / 03 / 2019	

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Condition no:	19	Date(s) of non-compliance:	2019
Details of non-compliance:			
Thermal imagery of the coal stockpile was not conducted on 10 days over the reporting period: 12/01/2019, 17/01/2019, 18/01/2019, 21/01/2019, 23/03/2019, 09/04/2019, 10/07/2019, 19/07/2019, 26/08/2019 & 28/10/2019			
Thermal imagery of the stockpile was conducted only once a day for 95 days.			
Date	Date	Date	Date
13/01/2019	23/03/2019	5/05/2019	3/08/2019
14/01/2019	26/03/2019	10/05/2019	4/08/2019
15/01/2019	29/03/2019	14/05/2019	5/08/2019
16/01/2019	30/03/2019	15/05/2019	7/08/2019
22/01/2019	3/04/2019	17/05/2019	10/08/2019
23/01/2019	4/04/2019	18/05/2019	11/08/2019
24/01/2019	6/04/2019	20/05/2019	12/08/2019
28/01/2019	7/04/2019	8/06/2019	15/08/2019
3/02/2019	8/04/2019	16/06/2019	16/08/2019
8/02/2019	10/04/2019	17/06/2019	17/08/2019
20/02/2019	12/04/2019	23/06/2019	19/08/2019
21/02/2019	17/04/2019	28/06/2019	20/08/2019
22/02/2019	20/04/2019	6/07/2019	22/08/2019
23/02/2019	22/04/2019	8/07/2019	23/08/2019
13/03/2019	25/04/2019	11/07/2019	24/08/2019
14/03/2019	1/05/2019	2/08/2019	25/08/2019
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 any environmental impact.			
Cause (or suspected cause) of non-compliance:			
Operators were not able to provide evidence of coal stockpile imagery twice a day, at least four hours apart. Inspection process is based on hard copy records which are not readily verifiable by management.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
CCL is investigating the replacement of hard copy records and incorporating inspection records as part of its HSE Risk Management database Cintellate. This will enable in situ recording of inspections and electronic recording of coal stockpile imagery inspections to enable generation of automated reports to verify compliance on a regular basis.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Condition no:	25	Date(s) of non-compliance:	December
Details of non-compliance:			
<p>The monthly data availability for OSIRIS Monitoring Location D – South Coogee Primary School for December 2019 was 87%.</p> <p>The monthly data availability for OSIRIS Monitoring Location E – Water Corporation for December 2019 was 87%.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No evidence of any environmental impact.			
Cause (or suspected cause) of non-compliance:			
<p>Failure of VPN connection to service provider.</p> <p>Monitoring data from the OSIRIS units is temporarily stored in the unit's data logger and transferred to AirQWeb a web based data management software managed by CCL's service provider Turkey from the UK. VPN connection was lost on the 28th of December and not resolved until 3rd of January 2020.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The OSIRIS monitoring network is around 15 years old with technology no longer supported by local service providers.</p> <p>CCL is investigating the option to have the data transferred to a local service provider through CCL's servers. This will allow early notification of data transfer failures by CCL's servers and also prompt action and resolution to issues raised with a local service provider.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: 28 / 01 / 2019	

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Condition no:	26	Date(s) of non-compliance:	November and December
Details of non-compliance:			
The following 24-hour ambient monitoring limit exceedances were recorded:			
Monitoring Location	Date	Average PM10	
BAM South	06/12/19	55	
BAM South	12/12/19	52	
BAM South	13/12/19	54	
BAM North	15/12/19	80	
BAM North	17/12/19	57	
BAM East	21/12/19	51	
BAM East	24/12/19	60	
OSIRIS C – Britannia	24/12/19	66	
BAM North	27/12/19	70	
BAM East	30/12/19	52	
BAM North	30/12/19	81	
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 any environmental impact. Monitoring locations are shown on Appendix 1: BAMs Network Monitoring Locations.			
Cause (or suspected cause) of non-compliance:			
Fugitive dust emissions.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Ceased clinker carting operations. Use of water truck for dust suppression. Use of a dust suppression mister. Application of dust suppression material over LKD and other unsealed areas. Use of shell grit as dust suppression over unsealed areas of around monitoring locations.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in		Date: 28/01/20	

writing			
Condition no:	29	Date(s) of non-compliance:	December 2019
Details of non-compliance:			
Daily inspections of the LKD disposal area, landfill, coal stockpile, shellsand stockpile and processing areas were not conducted on four days during the reporting period: 19/12/2019, 20/12/2019, 30/12/2019 and 31/12/2019.			
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 any environmental impact.			
Cause (or suspected cause) of non-compliance:			
Inspections not conducted over a period where of extended leave of nominated responsible person. Inspections were missed during the coverage period.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Detailed handover notes to incorporate itemized list of all key tasks and responsibilities associated with the role for all extended leave cover. CCL is investigating the replacement of hard copy records and incorporating inspection records as part of its HSE Risk Management database Cintellate to enable in situ electronic recording of inspections to generate automated reports to verify compliance on a regular basis.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Condition no:	39	Date(s) of non-compliance:	2019
Details of non-compliance:			
The following Groundwater parameters were not monitored during the reporting period:			
Monitoring Bore	Parameter	Month	
A (S, I & D)	pH	January	
D (S)	pH	January, February, March and April	
Z (S)	pH	May, June, July, August, September, October, November and December	
Z (S)	EC	November	
Z (S)	Temperature	November	
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 any environmental impact.			
Cause (or suspected cause) of non-compliance:			
A – pH malfunction at the time of sampling. No back up items available from the supplier. D – blocked at 2.5m below collar. Unable to fit pH probe. Smaller EC and Temperature probe used. Z – blockage or casing kink at 12.3m below collar. Unable to fit pH probe. Z – EC and Temperature measured with smaller probe when available from supplier.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
D (S) re-drilled in May. Z – smaller probe used for measurement of EC and pH where available from supplier. Bore Z to be re-drilled			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 30 / 03 / 2019	

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Condition no:	42 (a)	Date(s) of non-compliance:	April, August, September, October, November and December
Details of non-compliance:			
Twelve Complaints were not responded to within the prescribed 72 hours of receipt.			
CC #	72 Hour Response Due Date	Actual Response Date	Actual Response Time
CC-004403	22-04-19 16:10	23-04-19 14:44	94:34
CC-004492	30-08-19 16:50	01-09-19 16:51	120:01
CC-004506	16-09-19 14:43	17-09-19 01:06	82:23
CC-004532	07-10-19 20:11	09-10-19 00:33	100:22
CC-004547	26-10-19 21:30	27-10-19 00:55	75:25
CC-004564	26-11-19 14:51	28-11-19 12:13	117:22
CC-004565	27-11-19 10:38	28-11-19 13:49	99:11
CC-004566	27-11-19 10:48	28-11-19 14:22	99:34
CC-004571	03-12-19 13:54	22-01-20 09:23	1267:29
CC-004585	24-12-19 14:45	30-12-19 15:43	216:58
CC-004586	27-12-19 11:50	30-12-19 15:45	147:55
CC-004587	28-12-19 11:40	30-12-19 15:46	124:06
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 any environmental impact.			
Cause (or suspected cause) of non-compliance:			
One complaint received during Easter holidays break. Database error recording 72hr response due date based on time of entry, not receipt date of complaint. Changes in complaint management to a centralized model and different time zone resulting in adjustments and familiarization with process and timeframes. Human error following de-centralization of complaints management with one complaint being missed for extended period.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Complaints management decentralized and returned to each site for local management. Out of office auto replies to be set up and tested over each public holiday extended break.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Condition no:	45	Date(s) of non-compliance:	January, February, March, August, September, October, November and December
Details of non-compliance:			
<p>Monthly CEMS data reports for January, February, March, August, September, October, November and December did not include NOx and SO2 emissions in required units of measure and averaging period as set out in Condition 7 and Table 9, Schedule 3.</p> <p>November weekly stack monitoring reports not submitted by 28th of December.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <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>			
Cause (or suspected cause) of non-compliance:			
<p>Amended Licence issued in January 2019 during peak reporting period. Monthly compliance report requirements discussed with service provider. Discrepancy in averaging period identified in March with monthly reports re-issued for January through to March. Change of Data Analyst at service provider resulted in incorrect units of measure reported from August to December.</p> <p>Weekly stack testing commenced on 1st of November as prescribed by the Licence.</p> <p>Stack testing reports were issued by the service provider but missed due to automatic filing rule of incoming mail.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Corrected the reporting requirements with the service provider.</p> <p>Removed automatic filing rule from incoming mail to prevent recurrence of similar non-compliance.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 28/03/2019 & 28 / 01 / 2020	

Section F – 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 particular¹.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:	Director	Position:	Company Secretary
Date:	29/3/20	Date:	30 MARCH 2020
Seal (if signing under seal):			

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.

² AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.