



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L8614/2011/2	Licence file number:	2011/010675
Licence holder:	Downer EDI Works Pty Ltd		
Trading as:	Downer Group		
ACN:	008 709 608		
Registered address:	39 Delhi Road, North Ryde, NSW 2113		
Reporting period:	01 / 07 / 2021 to 30 / 06 / 2022		

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 complete: <ul style="list-style-type: none">• section C;• section D if required; and• sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none">• section C;• section D if required;• section E; and• sign the declaration at 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 35	13,870 tons

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
L1 Triple Interceptor Waste	5,500 Litres

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:	2.2.3 and 5.3.1	Date(s) of non-compliance:	17/12/2021
Details of non-compliance:			
<p>On the 17th of December 2021, stack testing was undertaken by suitably qualified air consultants 'Ektimo' in accordance with licence requirements. Draft results from this testing were received in January 2021 and showed that the required flow rate of the stack was not adhered to, with the results showing the stack flow rate at 7.3 m/s, below the 9 m/s outlined in condition 2.2.3 of the site environmental licence.</p> <p>In regard to the second part of the non-compliance regarding licence condition 5.3.1 – communication of the results was not distributed to the correct personnel, and therefore appropriate review of results did not occur allowing timely notification of this licence non-conformance.</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>Given the lower flow velocity, reduced pollutant dispersion potentially has occurred. However, given that the other pollutants tested for were well below licence limits, this is unlikely to have caused any significant environmental impact.</p> <p>The discharge point of this non-conformance was the licensed discharge point A1, which is labelled in the site map outlined in Schedule 1 of the site environmental licence L8614/2011/2.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The consultant providing the report identified the likely cause of the issue as an issue with the stack fan. It was advised that given the age of the plant, repairs and/or replacement of this component was required.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>This stack fan, which was identified as the likely cause of the issue was repaired as soon as practicable. In addition, Downer have purchased a newer, more efficient asphalt plant which will replace the existing asphalt plant operating at the time of the non-conformance. Given the newer pollution control technology in the more modern plant, this will further mitigate the chance of this incident re-occurring.</p> <p>In addition, the air quality consultants have updated there reporting system so that any future results will be distributed not only to site, but also to the state production manager, and the environment and sustainability manager. This will ensure that all results will be reviewed by the relevant parties able to appropriately address any concerns.</p>			

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: / /

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 :	[Redacted]	Signature:	[Redacted]
Name: (printed)	[Redacted]	Name: (printed)	[Redacted]
Position:	State Manager	Position:	Production Operations Manager
Date:	16/09/2022	Date:	16/09/2022
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.