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Environment Protection Authority



COMPLIANCE AUDIT PROGRAM



ENVIRONMENT PROTECTION AUTHORITY

Environment
Protection
Authority
New South Wales

ENVIRONMENT PROTECTION AUTHORITY

FINAL

COMPLIANCE AUDIT REPORT

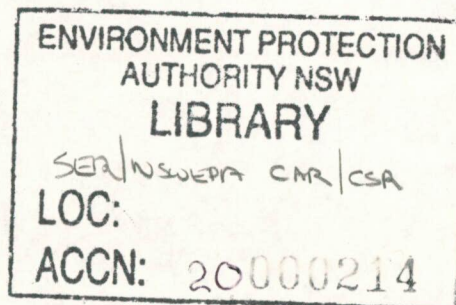
CSR LTD AND VACUUM OIL COMPANY PTY LTD

CSR EMOLEUM

QUEANBEYAN

NSW

DECEMBER 1999



EXECUTIVE SUMMARY

An Environment Protection Authority (EPA) Compliance Audit was undertaken at the CSR Emoleum bitumen plant, operated by CSR Ltd and Vacuum Oil Company Pty Ltd and located in Queanbeyan. The site was audited as part of a statewide program of compliance audit. The main objectives of the audit were to assess compliance with the statutory requirements administered by the EPA and make recommendations for an action program to address any non-compliance identified during the audit.

Assessment of compliance was undertaken by a detailed site inspection, discussion with representatives of the enterprise and review of all records and documentation required by the statutory instruments issued to the enterprise. The site inspection was carried out by officers of the EPA on 17 August 1999.

The findings of the audit indicate that the enterprise is not complying with a number of conditions attached to the licence issued under the Pollution Control Act and taken to be an Environment Protection Licence under the Protection of the Environment Operations Act.

Issues of concern identified during the course of the audit include:

- The temperature of the material in the bulk storage tanks exceeded 160 degrees Celsius for bitumen products.
- Sand in the materials storage bay had been allowed to bank up against the windshield.

An action program has been developed to ensure that the enterprise addresses the non-compliances.

Further observations, beyond the scope of the compliance audit, are also presented in this report. Issues of concern in relation to further observations are:

- The EPA is concerned that the enterprise does not have any procedures in place to ensure the integrity of the underground storage tanks and associated pipework. If leakage was occurring there is potential for hydrocarbon contamination of soil and groundwater.
- There is the potential for hydrocarbon-contaminated runoff from the waste bitumen stockpile to migrate off the site during rainfall events. The EPA is concerned that during such events hydrocarbon-contaminated runoff could enter the stormwater drainage system, and thus increase the likelihood of the company breaching the Clean Waters Act.
- The baghouse on the bitumen batching plant has recently been upgraded. The upgraded baghouse does not have a system for alerting employees to a failure or breakdown of the dust extraction equipment. The EPA is concerned that, should the baghouse fail in any way, air pollution may inadvertently occur.
- A 'bad batch' of emulsion was stored in an area located in the south-western corner of the site. The EPA is concerned that the company do not have procedures in place for the recycling, reuse or disposal of the waste emulsion.

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1. INTRODUCTION

1.1 Purpose of the Report

This report has been prepared to present the findings of the compliance audit carried out at CSR Emoleum Road Services plant at High Street, Queanbeyan, operated by CSR Ltd & Vacuum Oil Company Pty Ltd. The report also outlines a time frame for follow up action to address any non-compliances identified during the audit and improve environmental performance.

The findings presented in this report are based upon information from the EPA's files, information supplied by employees of the enterprise and information collected during the site inspection on 17 August 1999. Matters of non-compliance with environmental legislation which may have occurred before or after the site inspection are not addressed in this report.

This report has been prepared for the purpose described and no responsibility is accepted for use of any part of this report in any other context or for any other purpose.

1.2 Scope of the Audit

The scope of this audit was limited to an assessment of compliance by the enterprise with legislation administered by the EPA and to the compliance of the enterprise with the conditions attached to the statutory instruments issued by the EPA.

Activities examined during the audit included the following:

1. Storage of materials on site
2. Transfer of materials
3. Processing of materials
4. Transport
5. Dust control
6. Water management
7. Waste management
8. Storage of fuel and chemicals
9. Administration and record-keeping

The objectives of the audit were:

- to assess whether the enterprise is complying with all current legislation administered by the EPA;
- to determine whether the enterprise has the appropriate statutory instruments for the activities carried out;
- to develop an action program to address any non-compliances and improve environmental performance.

1.3 Premises and Process Description

CSR Emoleum Road Services is located in High Street, within the Queanbeyan local government area. The premises is surrounded by industry except for the northern boundary which runs parallel to a rail line. The closest residential property is located in Carrington Street, NSW.

CSR Emoleum is a partnership between CSR Ltd and Vacuum Oil Company Pty Ltd. Current production is approximately 50,000T per annum.

Asphalt is made on demand and the use of the batching facility is dependent on a number of factors which include seasonal effects such as temperature. There is a greater use of the plant in summer than in winter.

A batch (truck load) is ordered by telephone made prior to the truck arrival on site. Each batch ordered is made up in approximately 15 minutes and in that time the truck arrives to be loaded with asphalt. The truck is weighed after loading and prior to departure the details are logged in a job sheet.

During the day bitumen and aggregate is delivered and stored in the appropriate location on site.

Procedures for batching asphalt:

Front-end loader feeds material on to the conveyor for transportation to the dryer. The feed conveyor is loaded with a mix of aggregate of defined size according to the batch ordered. The conveyor feeds a rotating dryer which contains a burner and a forced draft derived from a fan. The dried aggregate is passed via a vertical shaft conveyor to a grader (shaker table) which maintains a source of appropriate sized aggregate for the pug mill which mixes a defined amount of aggregate with bitumen to form the hot asphalt. The batch from the pug mill is then either deposited directly to a waiting truck below or deposited into a skip which travels up an incline to the top of two thermally insulated silos from which trucks can also be loaded.

Bitumen for the pugmill is stored on site in three heated storage tanks. Other chemicals stored are bitumen roadspray (heated), emoleum (cold-mix), bitumen emulsion, diesel, kerosene, lime, trichloroethylene and asphalt adhesion agents.

Emissions from the plant are ducted to a baghouse and the majority of collected dust is reused in the process. The burner in the dryer is operated only when needed although the fans for the dryer and dust extraction system (baghouse) may operate from commencement of work to shut down.

The Enterprise advised that all contaminated site runoff is passed through oil/water separators and goes to sewer, in accordance with a trade waste agreement with Queanbeyan Council. Trapped sediment is supplied to a nearby concrete works for recycling.

A truck wash is located in an undercover washing bay. Wastewater from truck washing operations passes through an oil/water separator. Separated wastewater, stored in a holding well, and waste oil are removed by a contracted liquid waste disposal service.

1.4 Statutory Instruments Issued to the Enterprise

The EPA has issued the following statutory instrument to the enterprise:

- Licence No.000851 issued under the Pollution Control Act, 1970 and taken to be an Environment Protection Licence under the Protection of the Environment Operations Act 1997 as described in Part 2 Clause 6 of the Protection of the Environment Operations (Savings and Transitional) Regulation 1998. The anniversary date for the licence is 16 January. A copy of the licence is attached as **Appendix A**.

2. ASSESSMENT OF COMPLIANCE

2.1 Compliance with Statutory Instruments

Compliance was assessed against all conditions attached to Environment Protection Licence No. 000851.

Assessment of compliance was undertaken by a detailed site inspection and a review of the records and documentation required by the licence.

Assessment of compliance, details of non-compliance and recommendations are presented in Table 2.1.

2.2 Compliance with Statutory Legislation

Compliance was assessed against environmental legislation administered by the EPA. The assessment involved a review of the EPA's records, information supplied by the enterprise and the site inspection to determine whether the enterprise has applied for all of the necessary statutory instruments.

The EPA's records reveal that the enterprise had not applied for, and obtained all of the necessary statutory instruments for the premises. It was noted that the baghouse attached to the bitumen plant has recently been upgraded. The enterprise reported that these works were carried out in December 1998. The enterprise did not apply for Pollution Control Approval to carry out these works as required under the Pollution Control Act and specified in the Clean Air Act.

It should be noted that under the current legislation, the Protection of the Environment Operations Act 1997, Pollution Control Approvals are now not required, however variations to the licence may be needed for certain works.

2.3 Further Observations

Further observations are recorded where issues of environmental concern were observed which do not strictly relate to the scope of the audit or assessment of compliance. Further observations are considered to be indicators of potential non-compliances or areas where environmental performance may be improved.

Aging underground fuel storage tanks, waste oil storage facility and associated infrastructure

The enterprise stores diesel and kerosene in underground storage tanks (USTs). Both the diesel and kerosene USTs have capacities of 58,000 litres. The tanks are approximately 12 years old.

Waste lube oil from the vehicle maintenance workshop is also stored underground. The waste oil is collected in a sump and piped to a waste oil collection tank. A liquid waste removal contractor pumps the collection tank out.

The enterprise reported that there is no system in place for determining if any of the USTs and associated infrastructure are leaking. The EPA is concerned that the enterprise does not have any procedures in place to ensure the integrity of the USTs and associated pipework. If leakage was occurring there is potential for hydrocarbon contamination of soil and groundwater.

Potential contamination of stormwater runoff from stockpiled waste bitumen product

On the day of the site inspection, waste bitumen was stockpiled in the western corner of the premises (directly behind the aggregate conveyor belt). There was no diversion works at this corner of the boundary to prevent runoff from this area of the site occurring. Hence, there is the potential for hydrocarbon-contaminated runoff from the waste bitumen stockpile to migrate off the site during rainfall events. The EPA is concerned that during such events hydrocarbon-contaminated runoff could enter the stormwater drainage system, and thus increase the likelihood of the company breaching the Clean Waters Act.

Operation of the baghouse

During the site inspection, it was noted that the baghouse on the bitumen batching plant has recently been upgraded. The upgraded baghouse, whilst likely to improve the companies management of dust emissions from the plant, does not have a system for alerting employees to a failure or breakdown of the dust extraction equipment. If the baghouse fails eg a bag breaks, the enterprise relies on the "loss of pressure" to indicate a problem. There is no alarm or equivalent system to indicate a bag failure and/or to automatically shutdown the plant. The EPA is concerned that, should the baghouse fail in any way, air pollution may inadvertently occur.

Emulsion waste product disposal options

On the day of the site inspection, a 'bad batch' of emulsion (approx. 6,000L) was stored in an area located in the south-western corner of the site. The waste emulsion would be unlikely to pose any risk to the environment in its present state. However, the site representative reported to the Audit team that the company was unsure how they were going to dispose of this waste.

The EPA is concerned that the company does not have procedures in place for the recycling, reuse or disposal of the waste emulsion.

TABLE 2.1 ASSESSMENT OF COMPLIANCE WITH LICENCE No. 000851

Statutory Instrument: Environment Protection Licence No. 000851			
Condition No.	Compliance	Comment	Action Required
S1	Yes		
S2	Yes		
S3	Yes		
S4(a-c)		The requirement of this condition did not apply during the licence period, as no monitoring is required by this licence.	
S5.1-S5.4		The requirement of the condition did not apply at the time of the audit. The audit team was advised that no pollution complaints have been received by the licensee or the licensee's agents or employees. The EPA does not have any evidence to indicate that any pollution complaints were received by the enterprise which would require reporting.	
S6.1-S6.4		The requirements of this condition did not apply at the time of the site inspection. There is no record keeping required by the licence other than the requirement to maintain a complaints register.	
S7.1-S7.2		The requirement of the condition did not apply as no event described in this condition occurred at the time of the audit. There is no evidence to suggest that such an event has occurred during the current licence period which would require reporting to the EPA.	
S7.3		This is a deeming clause which determines the applicability of conditions S7.1-S7.2. No assessment of compliance is required.	

Statutory Instrument: Environment Protection Licence No. 000851			
Condition No.	Compliance	Comment	Action Required
S8.1-S8.4		The requirement of this condition did not apply at the time of the site inspection. During the current licence period, there is no evidence on file that the EPA made a written request for a written report from the enterprise in relation to any event described in this condition.	
S9.1-S9.3		The requirements of this condition did not apply at the time of the site inspection. The Certificate of Compliance (CoC) for the current licence period is due within six weeks after this licence expires on 16 January 2000.	
S9.4	Yes		
S9.5		The licensee is not a natural person. The licensee is CSR Emoleum and Vacuum Oil Company Pty Ltd.	
S9.6		This is a statement which describes the alternative methods that may be used to certify the Certificate of Compliance.	
S10.1-S10.3	Yes		
S11.1		This condition is a deeming clause that determines the applicability of conditions S11.2 –S11.6. These conditions are applicable, as the licensee is a corporation.	
S11.2	Not determined	It is not determined if the licensee has authorised at least two of the licensee's senior employees or agents to speak on behalf of the licensee and to provide any information or document required under this licence. (See comments S11.3)	The enterprise must authorise at least two employees or agents to represent the licensee.

Statutory Instrument: Environment Protection Licence No. 000851			
Condition No.	Compliance	Comment	Action Required
S11.3	No	There is no information on file to indicate that the licensee has formally advised the EPA of the names and telephone numbers of persons authorised to speak on behalf of the licensee and to provide any information or document required under this licence.	The enterprise must provide formal advice to the EPA of the names and telephone numbers of at least two authorised persons and their contact telephone numbers.
S11.4	This condition is a deeming clause which determines the applicability of condition S11.3 and S11.5.		
S11.5-S11.6	The requirements of these conditions did not apply, as the information required under condition S11.2 has not been provided.		
P1	Not determined	<p>It has not been determined if the licensee only operates plant and equipment at the premises between the hours of 6.30am and 10pm since the site inspection was carried out between the hours of 8am and 1pm.</p> <p>Note: The Supervisor advised that some employees arrive at the workplace at 6.00am, however, site operations start around 6.30am. Normal finishing time for asphalt mixing operations is approximately 3.00pm. Only specials jobs will require the late finish of 10.00pm.</p> <p>The EPA has no reason to suspect that the enterprise is operating outside the times specified in this condition.</p>	The enterprise to ensure that operation of the premises only occurs between the hours of 6.30am and 10 pm.

Statutory Instrument: Environment Protection Licence No. 000851			
Condition No.	Compliance	Comment	Action Required
P2	Not determined	<p>It has not been determined if vehicles greater than 4 tonnes tare only enter or leave the premises between the hours of 6.30am and 10pm since the site inspection was carried out between the hours of 8am and 1pm.</p> <p>Note: The Supervisor advised that trucks do not enter the premises until 6.30am. Normal finishing time for trucks leaving the premises is approximately 5.00-6.00pm. Special jobs require the late finishing time of 10.00pm.</p> <p>The EPA has no reason to suspect that vehicles greater than 4 tonnes enter or leave the premises outside the times specified in this condition.</p>	The enterprise to ensure that no vehicles greater than 4 tonnes tare enter or leave the premises outside the hours of 6.30am and 10pm.
A1	Yes		
A2 (part 1)	No	<p>The temperature of the material in the bulk storage tanks must not exceed 165 degrees Celsius for bitumen products...</p> <p>The temperature of the material in the bulk storage tanks inspected on the day of the site inspection exceeded 165 degrees Celsius for bitumen products.</p> <p>Further, according to the most current calibration records supplied by the company, all storage tanks holding bitumen products have temperatures over 165 degrees Celsius (ranging from 167 to 173 degrees Celsius).</p> <p>It is noted that the spray seal tanks could hold either bitumen or modified bitumen product.</p> <p>The gauges inspected on the day of the site inspection were well-maintained and tamper-proof.</p>	<p>The enterprise to ensure that the temperature in the bulk storage tanks does not exceed 165 degrees Celsius for bitumen products</p> <p>Or</p> <p>Renegotiate the condition with the Southern Tablelands regional office of the EPA.</p>

Statutory Instrument: Environment Protection Licence No. 000851			
Condition No.	Compliance	Comment	Action Required
A2 (part 2)	Yes	The temperature of the material in the bulk storage tanks must not exceed 180 degrees Celsius for modified bitumen products...	
A3		<p>The requirements of the condition did not apply at the time of the site inspection, as automatic water sprays are not provided at the point of discharge from the material holding hopper to conveyor belts. Therefore, water sprays can not be initiated on start-up of the conveyor.</p> <p>Note: On the day of the site inspection, there was no evidence of dust being generated during the movement of material from the holding hopper to the conveyor belt. The site supervisor advised that material generally arrives wetted. Further, water sprays over aggregate storage bays are initiated on an as-needs basis.</p>	
A4		<p>The requirements of the condition did not apply at the time of the site inspection since no dust emissions were occurring during truck loading and unloading operations to require water spray nozzles to be operated.</p> <p>However, on the day of the site inspection, it was observed that a water sprinkler system was in place in the aggregate storage bay area. The site representative demonstrated the use of the sprinkler system, indicating that water spray nozzles could be operated in such a way to adequately suppress dust emissions during truck loading and unloading operations.</p> <p>The EPA has no reason to believe that this condition would not be complied with during truck loading and/or unloading operations.</p>	
A5		<p>The requirements of the condition did not apply at the time of the site inspection since conveyor belt cleaning operations were not being conducted.</p> <p>However, the site representative advised the audit team that the cleaning of conveyors is conducted on an as-needs basis. Any material removed during conveyor belt cleaning is recycled through the plant.</p> <p>There was no evidence of spilt material in the vicinity of the conveyor belt.</p> <p>The EPA has no reason to believe that this condition would not be complied with during conveyor belt cleaning operations.</p>	

Statutory Instrument: Environment Protection Licence No. 000851			
Condition No.	Compliance	Comment	Action Required
A6	Yes		
A7	Yes		
A8	Not determined	<p>It was not determined if burners were self-proportioning and adjusted as to supply sufficient air for complete combustion of the fuel at all burner settings.</p> <p>However, the site representative advised the audit team that AGL regularly inspect and maintain gas supply and associated infrastructure, including the self-proportioning mechanisms of the burners.</p>	<p>The enterprise must ensure that burners are self-proportioning and adjusted as to supply sufficient air for complete combustion of the fuel at all burner settings</p> <p>Or</p> <p>Renegotiate the condition with the Southern Tablelands regional office of the EPA.</p>
A9	No	On the day of the site inspection it was evident that the sand bin in the aggregate storage bay was excessively full and sand had been allowed to bank-up against the windshield.	The enterprise must ensure that material is not allowed to bank-up against the windshields.
A10		<p>The requirements of this condition did not apply at the time of the site inspection since there were no spillage of material on to sealed areas, as a result of delivery or handling, that would require cleaning up.</p> <p>The site representative advised the audit team that if a spillage of material occurs as a result of delivery or handling, it is controlled by cleaning up the spill and watering the sealed areas.</p> <p>The EPA has no reason to suspect that the enterprise does not comply with this condition if a spillage of material on to a sealed area were to occur.</p>	

3. ACTION PROGRAM FOR THE ENTERPRISE

Recommendations for an action program in relation to compliance are summarised in Table 3.1.

TABLE 3.1 ACTION PROGRAM

Condition No	Action details	Target date
ENVIRONMENT PROTECTION LICENCE No. 000851		
S11.2 & S11.3	The enterprise must provide formal advice to the EPA of the names and telephone numbers of at least two authorised persons and their contact telephone numbers.	Immediately
P1	The enterprise to ensure that operation of the premises only occurs between the hours of 6.30am and 10pm.	Ongoing
P2	The enterprise to ensure that no vehicles greater than 4 tonnes tare enter or leave the premises outside the hours of 6.30am and 10pm.	Ongoing
A2 (part 1)	The enterprise to ensure that the temperature in the bulk storage tanks does not exceed 165 degrees Celsius for bitumen products Or Renegotiate the condition with the Southern Tablelands regional office of the EPA.	Ongoing Or 1 March 2000
A8	The enterprise must ensure that burners are self-proportioning and adjusted as to supply sufficient air for complete combustion of the fuel at all burner settings Or Renegotiate the condition with the Southern Tablelands regional office of the EPA.	Ongoing Or 1 March 2000
A9	The enterprise must ensure that material is not allowed to bank-up against the windshields.	Immediately

APPENDIX A

ENVIRONMENT PROTECTION LICENCE No 000851

Pollution Control Act, 1970.

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"harm" in relation to the environment, includes any direct or indirect alteration to the environment that has the effect of degrading the environment and, without limiting the generality of the foregoing, includes:

- (a) any act or omission that results in air pollution, within the meaning of the Clean Air Act 1961; and
- (b) any act or omission that results in the pollution of any water, within the meaning of the Clean Waters Act 1970.

"dry weather conditions" means less than ten millimetres of rain falling within a 24 hour period.

Pollution of waters

S1. The licensee must not pollute waters except as expressly permitted by this licence. (That is, the defence in section 16 (6) of the Clean Waters Act 1970 is available only if the licensee pollutes waters as expressly permitted by this licence.)

In this condition, the terms "**pollute**" and "**waters**" have the same meaning as in the Clean Waters Act 1970.

Activities must be carried out competently

S2. All activities carried out on the premises must be carried out in a competent manner.

In this condition, "**activities**" includes:

- (a) the processing, handling, movement and storage of materials and substances; and
- (b) the treatment, storage and disposal of wastes (including solid and liquid wastes).

Maintenance of plant and equipment

S3. All plant and equipment installed or used in or on the premises:
(a) must be maintained in a proper and efficient condition; and
(b) must be operated in a proper and efficient manner.

In this condition, "**plant and equipment**" includes drainage systems, infrastructure, pollution control equipment and fuel burning equipment.

Testing methods

S4. Any monitoring required by this licence must be carried out:
(a) in accordance with any relevant testing methods set out in the New South Wales Clean Air (Plant and Equipment) Regulation 1997, the Clean Waters Regulations 1972 or the

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- Noise Control Regulation 1975; or
- (b) in accordance with any method set out in any condition of this licence; or
 - (c) if no compulsory method is set out in those Regulations or in this licence, in a manner approved by the EPA in writing before any tests are conducted.

Record of pollution complaints

- S5.1 The licensee must keep a legible record of all complaints received by the licensee or by any employee or agent of the licensee, in relation to pollution from or on the premises.
- S5.2 The record must include details of the following:
- (a) the date and time of the complaint;
 - (b) the method by which the complaint was lodged;
 - (c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
 - (d) the nature of the complaint;
 - (e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant.
- S5.3 The record of each complaint must be kept for at least 2 years after the complaint was received.
- S5.4 The records must be produced to any officer of the EPA who asks to see them.

Records

- S6.1 The results of any monitoring required by this licence must be recorded.
- S6.2 All records required to be kept by this licence must be kept in a legible form or in a form that can readily be reduced to a legible form.
- S6.3 The records must be kept for at least 3 years after the monitoring or event to which they relate took place.
- S6.4 The records must be produced in a legible form to any officer of the EPA who asks to see them.

Reporting of environmental harm

- S7.1 If anything happens on the premises that has caused, is causing or is likely to cause harm to the environment, whether the harm occurs on or off the premises, the licensee must report the event to the EPA as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents.

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- S7.2 The event must be reported by telephoning:
- (a) the regional office of the EPA on the phone number specified on the front of this licence, if the event is reported during office hours;
 - (b) the after hours telephone number specified on the front of this licence, if after office hours;
 - (c) in the event that an EPA officer cannot be contacted at either of those numbers, the EPA's "Pollution Line" service on 131 555.
- S7.3 This condition does not apply when the harm caused or likely to be caused to the environment is expressly permitted by this licence.

Written report

- S8.1 The EPA may make a written request that the licensee prepare a written report of any event on the premises that, in the opinion of the EPA, has caused, is causing or is likely to cause harm to the environment, whether the harm occurs on or off the premises.
- S8.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within 21 days of the request, or within such shorter time as may be specified in the request.
- S8.3 The report must include the following information:
- (a) all details known to the licensee of the cause, time and duration of the event;
 - (b) all details known to the licensee of the type, volume and concentration of every pollutant released as a result of the event;
 - (c) the name, address and telephone number of every employee or agent of the licensee who witnessed the event;
 - (d) the name, address and telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
 - (e) details of any remedial action taken by the licensee or any other person in relation to the event;
 - (f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event.
- S8.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.

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Certificate of compliance

S9.1 The licensee must supply the following particulars to the EPA, and must provide a certificate to the EPA, certifying that those particulars are correct:

Monitoring conditions

- (a) whether all monitoring required by this licence has been carried out;
- (b) if all the monitoring has not been carried out, what monitoring has not been carried out and the reasons why the monitoring has not been carried out;
- (c) whether all the monitoring data required to be reported to the EPA by this licence has been reported to the EPA;
- (d) whether all that monitoring data was reported within the time specified by this licence;
- (e) if all the monitoring data has not been reported to the EPA, or has not been reported within the time specified, the reasons why the monitoring data has not been so reported;
- (f) whether all the monitoring data reported to the EPA was derived from monitoring carried out in accordance with this licence;
- (g) if any of the monitoring data reported to the EPA was not derived from monitoring carried out in accordance with this licence, what monitoring data was not so derived and the reasons why the monitoring data was not so derived;

Compliance with conditions

- (h) whether every condition of this licence has been complied with;
- (i) if one or more conditions have not been complied with, in relation to each such condition:
 - (i) the nature of the non-compliance; and
 - (ii) the reasons for that non-compliance; and
 - (iii) any action taken to prevent, control or mitigate the non-compliance; and
 - (iv) any action that has been or will be taken to prevent a recurrence of the non-compliance.

S9.2 The certificate must be in the form entitled "Pollution Control Act 1970 - Certificate of Compliance" available from any office of the EPA.

S9.3 The certificate must be provided to the EPA no later than 6 weeks

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after the date of expiry of this licence.

- S9.4 If this licence is a renewed licence, the certificate required by any previous licence held by the licensee must be provided to the EPA no later than 6 weeks after the date of expiry of the previous licence.
- S9.5 If the licensee is a natural person, the certificate must be signed by the licensee.
- S9.6 If the licensee is a corporation, the certificate may, as an alternative to the affixing of the corporate seal, be signed:
- (a) by the chief executive officer of the corporation; or
 - (b) by any other person approved by the EPA in writing.

NOTE: **The certificate must not be completed or signed before the licence expires, as you must report your compliance with licence conditions for the entire licence period.**

Licence must be kept at premises

- S10.1 A copy of this licence must be kept at the premises.
- S10.2 The licence must be produced to any officer of the EPA who asks to see it.
- S10.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.

Responsible employees

- S11.1 This condition does not apply if the licensee is a natural person who conducts the operation by himself or herself.
- S11.2 The licensee must authorise at least two of the licensee's senior employees or agents:
- (a) to speak on behalf of the licensee; and
 - (b) to provide any information or document required under this licence.
- S11.3 The licensee must authorise those persons, and inform the EPA of the names and telephone numbers of those authorised persons, within 14 days of the date of this licence coming into force.
- S11.4 If this licence is a renewed licence, and the licensee has previously authorised persons and informed the EPA of their names and addresses, the licensee is not required to again inform the EPA if those people continue to be authorised and their telephone numbers have not changed.

Pollution Control Act, 1970.

Licence Number: 000851

In Force Until: 16 January, 2000

S11.5 The licensee must inform the EPA of any change in the information provided under this condition within 14 days of the change.

S11.6 Any person authorised by the licensee must be readily contactable on the person's nominated telephone number during regular working hours.

P1. The licensee must only operate plant and equipment at the premises between the hours of 6.30 am and 10 pm.

P2. Vehicles greater than 4 tonnes tare may only enter or leave the premises between the hours of 6.30 am and 10 pm.

Pollution Control Act, 1970.

Further conditions with respect to the Clean Air Act 1961

Licence Number: 000851

In Force Until: 16 January, 2000

Prescribed Use Classification: PRE-MIX BITUMEN PLANTS

Operational Scale: more than 10 kilotonnes but not more than 50 kilotonnes per annum

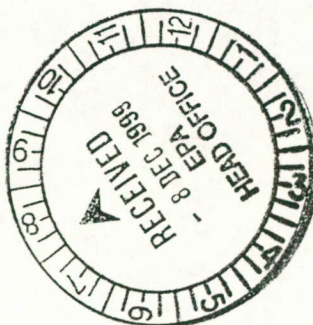
- A1. The sulphur content of the fuel used must not exceed 0.05 percent by weight.
- A2. The temperature of the material in the bulk storage tanks must not exceed 165 degrees celsius for bitumen products and 180 degrees celsius for modified bitumen products.
- A3. Automatic water sprays provided at the point of discharge from the material holding hopper to conveyor belts must be initiated on start-up of the conveyor when the material being discharged is not sufficiently wet to prevent dust generation.
- A4. Water spray nozzles must be operated to suppress dust emissions that occur during truck loading and/or unloading operations.
- A5. Material removed during conveyor belt cleaning operations must be contained for dust free disposal or re-use. It must not be discharged to the ground.
- A6. All sealed surfaces intended to carry vehicular traffic must be kept clean.
- A7. Unsealed trafficable areas must be maintained, at all times, in a condition which minimises the emission of wind-blown or traffic-generated dust.
- A8. Burners must be self-proportioning, and must be so adjusted as to supply sufficient air for complete combustion of the fuel at all burner settings.
- A9. Material must not be allowed to bank-up against the windshields.
- A10. Any spillages of material onto sealed areas, as a result of delivery or handling, must be cleaned up without delay into storage bins or other suitable receptacles, or must be controlled by watering of the sealed areas immediately following the delivery or handling operation.

APPENDIX B

ENTERPRISE RESPONSE

CSR**Emoleum**

Road Services

1 Unwin Street
Rosehill N.S.W. 2142Private Bag 1
Granville N.S.W. 2142Phone: (02) 9897 4333
Fax: (02) 9897 4311

Friday, December 03, 1999
Liesl Truscott
NSW EPA
PO Box A290
Sydney South
NSW 1232

Re Compliance audit CSR Emoleum Roads Services Queanbeyan

Dear Liesl,

Thank you for the draft compliance audit report conducted on our premises at Queanbeyan on the 17th August 1999. Please find following our comments as a result of us reviewing the report.

ACTION PROGRAM

CSR Emoleum intends to carry out the recommended actions as described in the *Action Program* of your report.

FURTHER OBSERVATIONS

CSR Emoleum will address the first 3 issues raised in the further observation section of the report by end of June 2000. However we are seeking clarification of the fourth point describing a "bad batch" of Emoleum. Please note that Emoleum is part of our Trading name and is not a product we produce. Please contact Noel Goodchild of our Queanbeyan Depot 02 6297 3144 in relation to clarifying the above query.

Should you wish to discuss this further with me please call on 9897-4345.

Sincerely,

A handwritten signature in black ink, appearing to be 'A Morrison'.

Andrew Morrison
EH&S Manager Eastern Region
CSR Emoleum Road Services