<table>
<thead>
<tr>
<th>Consider</th>
<th>What to Check</th>
<th>Details of Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the licensee aware of review?</td>
<td>Contact licensee to let them know review is underway (Check PALMS communication tab. This should be done by RACSU)</td>
<td>Notification Letter sent 5/July/2018. NIL response received.</td>
</tr>
<tr>
<td>Are the licensee details correct?</td>
<td>Check accountable party details against Response provided above (if applicable), <a href="http://www.asic.gov.au">www.asic.gov.au</a>, <a href="http://www.abr.business.gov.au">www.abr.business.gov.au</a>, or <a href="http://www.dlg.nsw.gov.au/dlg/dighome/documents/Downloads/lgdpall.xls">www.dlg.nsw.gov.au/dlg/dighome/documents/Downloads/lgdpall.xls</a> Check contact details with licensee.</td>
<td>Details have been checked and updated. Further changes will be required early in 2019 as a new Station Manager is being appointed.</td>
</tr>
<tr>
<td>Are the premises details correct?</td>
<td>Check common name and address details. Check SIX viewer, SAI Global if required, Project Approvals etc.</td>
<td>Details have been checked and are correct. Further changes will be required when the water treatment facility presently under construction on Mt Piper land becomes operational in July 2019 as a separate stand-alone activity.</td>
</tr>
<tr>
<td>Are the scheduled activities and fee base activities correct?</td>
<td>Check against licence application form. Check against last Annual Return/Annual Reports or site inspection.</td>
<td>Details have been checked and are correct.</td>
</tr>
<tr>
<td>Are the types and locations of monitoring/discharge points correct and/or are there any that can be removed/added?</td>
<td>Check against site map, site plans or PIRMP. Check against standard approach for describing points on licence.</td>
<td>The location of licensed discharge point 1 (LDP1) has been relocated to the coal stockpile sediment basin, and discharge limits, discharging monitoring, and conditions concerning management of the basin following rainfall have been attached by Notice 1569404. Ambient air monitoring points previously on licence 766 have been transferred to this licence. Air discharge and monitoring locations are being reviewed and potentially changed (monitoring locations) as part of the NSW Coal Fire Power Station Review Project. Finalising the outcomes of the NSW Coal Fire Power Station Review Project is continuing and will continue past the Statutory licence review period.</td>
</tr>
<tr>
<td>Are limit/monitoring tables correct?</td>
<td>Check limits are appropriate (e.g. Clean Air Regulation). Check pollutants/units are appropriate.</td>
<td>Premises is Group 4 under the Clean Air Regulation whereas most limits are Group 6 (more</td>
</tr>
</tbody>
</table>
| **Check frequency is appropriate.**  
**Check method against Approved Methods** | **stringent). Pollutants, frequency, and methods are appropriate**  
**Air emission concentration limits and monitoring requirements are being reviewed and potentially limits lowered and monitoring improved and expanded, including through expansion of continuous emission monitoring by the EPA’s TAA-Air Section as part of the NSW Coal Fired Power Station Review Project.**  
This element is continuing and will continue past the Statutory licence review period. |
|---|---|
| **Are non-standard conditions /PRPs still appropriate?**  
**Review all non-standard conditions and PRPs.** | **Check for correct plain English.**  
**Check that licensee can comply.**  
**Check that EPA can enforce the condition.**  
**Check that requirements and PRP dates are still current or have been completed (in which case they can be removed).** | **checked**  
**licensee can comply**  
**checked**  
**No current PRP’s**  
This constitutes ongoing actions – see below.  
**The Region has reviewed all conditions of the licence to ensure the licence is fit for purpose and up to date and that to the licensee will achieve the EPA’s objectives and the objectives of the POEO Act.**  
**Finalising the outcomes of the NSW Coal Fire Power Station Review Project will continue past the Statutory licence review period.** |
| **Is the licence consistent with other licences in the sector?** | **Check against model licence (if applicable).**  
**Check against any Compliance Audit Unit sector reviews.**  
**Check against Monitoring Protocols stored on Insite.** | **This constitutes ongoing actions – and is being addressed as a fundamental driver of the NSW Coal Fired Power Station Review Project.**  
**Finalising the outcomes of the NSW Coal Fire Power Station Review Project will continue past the Statutory licence review period.** |
| **Have submissions and any issues outstanding from other EPA actions been considered?** | **Check file for any public/licensee submissions.** | **This constitutes ongoing actions – see below.**  
**Public submissions stored in SF18/100537. A high volume of public submissions have been received, most of which relate to the regulation of all NSW Power Stations. Finalisation of the NSW Coal Fired Power Station Review**
Check whether outstanding matters from previous reviews, Compliance Audit Unit action, PNPs, prosecutions, complaints etc.

Project will continue past the Statutory licence review period and will respond to matters raised by the public submissions.

Other issues considered not related to the NSW Coal Fired Power Station Review Project include:
1. Water management changes associated with proper operation of the coal stockpile sediment basin.
2. Review management of the ash emplacement area presently under investigation.
3. Need for better air monitoring in Lithgow.

<table>
<thead>
<tr>
<th>Risk Based Licensing – Environmental Risk Assessment</th>
<th>Has there been any change to the licensee’s activities since the last ERA?</th>
<th>Potentially. Annual monitoring of the ash emplacements indicates the Mount Piper emplacement area may be impacting groundwater. This is currently under investigation.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>If yes, need to undertake a new ERA.</td>
<td>Potentially.</td>
</tr>
<tr>
<td></td>
<td>Has there been any changes to the licensee’s pollution controls, environmental management systems, or incident management systems since the last ERA?</td>
<td>Nothing of substance.</td>
</tr>
<tr>
<td></td>
<td>If yes, need to undertake a new ERA.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Has there been any changes to the receiving environment or location of sensitive receptors since the last ERA?</td>
<td>Nothing of substance.</td>
</tr>
<tr>
<td></td>
<td>If yes, need to undertake a new ERA.</td>
<td></td>
</tr>
</tbody>
</table>

**RECOMMENDATION**

☒ Vary licence
☐ No change to licence
☒ Other

**COMMENTS FROM REVIEWING OFFICER**

As a priority make changes to the licence to include ambient monitoring requirements on the licence (from EPL 766) and to update management of the coal stockpile sediment based.

Continue with NSW Coal Fired Power Station Review Project and further vary the licence to incorporate outcomes of the NSW Coal Fired Power Station Review Project that are relevant to Mount Piper. In doing so, consider responses from Ministry of Health and Office of Environment & Heritage.

**PROCESS INFORMATION**

Darryl Clift  
Head Regional Operations CW  
Date: 21/12/2018

**AUTHORISATION**

Regional Manager: Sandie Jones.  21/12/2018

**PALMS UPDATE**

Finalised Date: 21 December 2018