

8.0 Statement of Commitments

In accordance with the requirements under the Part 3A (repealed) provisions of the EP&A Act, the following draft Statement of Commitments is provided. Regain commits to the implementation of the environmental management measures detailed in **Table 51** during construction and operation of the proposed modification.

Table 51 Draft Statement of Commitments

Issue	Safeguard
General	<ol style="list-style-type: none"> 1. The Proponent would implement all practicable measures to prevent or minimise harm to the environment that may result from the construction or operation of the Project. 2. The Proponent would implement all practicable measures to prevent or minimise harm to the environment that may result from the construction or operation of the Project. 3. The Proponent would prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management practices and procedures to be followed during the construction phase, particularly in relation to the management of soils, surface waters, air quality, and noise management. 4. The Proponent would update a current EMP prepared for the existing site activities. 5. The Proponent would operate the facility in accordance with existing EPA pollution control approvals for existing operations at the Tomago smelter. 6. The Proponent would operate the facility in accordance with existing EPA Environmental Protection Licences (EPLs) issued for existing operations of the smelter. 7. The Proponent would ensure regular inspection, monitoring and auditing is undertaken to maintain effective environmental management and to highlight non-compliance of standards, conditions or licence requirements. 8. The Proponent would ensure routine monitoring of air quality, groundwater and surface water is undertaken. Groundwater and surface water monitoring is undertaken in conjunction with the TAC smelter existing monitoring program where appropriate.
Air Quality	<ol style="list-style-type: none"> 1. The Proponent would implement dust mitigation strategies throughout the facility including: <ul style="list-style-type: none"> - Enclosure of external plant; - Construction of sealed processing and product storage facilities; - Installation of dust extraction systems throughout the processing plant and connected to dust generating activities; and - Installation of visual and audible alarm systems to minimise potential for dust generation in the event of plant / system breakdown or failure. 2. The Proponent would ensure residual emissions would be directed to the atmosphere via stacks, as indicated by the proposal. 3. The Proponent would implement dust mitigation strategies as part of the CEMP which will include: <ul style="list-style-type: none"> - Stabilisation of disturbed surfaces during construction; - Removal of excessive soil on construction vehicle tyres; and - Spraying of stockpiled earths / fine construction material during high winds to reduce potential for dust. 4. The Proponent would maintain processing plant and Shed 5 under negative pressure, treated products would be maintained in a moist condition, to mitigate fugitive emissions. 5. The Proponent would control SPL processing stages to destroy cyanide and hazardous gases.

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	<ol style="list-style-type: none"> 6. The Proponent would control the thermal treatment process (i.e. maintain the temperature below 850°C) to minimise liberation of gaseous fluoride. 7. The Proponent would operate baghouse dust collectors to minimise emissions of particulate matter and particulate-bound contaminants. 8. The Proponent would apply appropriate housekeeping practices to minimise dust generation from concrete apron areas.
Hazard and Risk	<ol style="list-style-type: none"> 1. The Proponent would prepare and implement a Safety Management System (SMS) for the SPL plant to include elements of the operations, maintenance and management of the facility. The SMS would be developed in accordance with the guidelines issued by the Department of Planning in Hazardous Industry Planning Advisory Paper No.9, "Guidelines for Safety Management Systems". 2. The Proponent would install the following systems within the SMS: <ul style="list-style-type: none"> - A kiln temperature monitoring and calibration procedure to ensure the temperature control system of the kiln is operated using correct data and information; - A burner management system designed in accordance with AS1853 ("Automatic Oil and Gas Burners: Mechanical Draught", Standards Association of Australia, Sydney, 1983); - A pressure management and monitoring / alarm system for dust extraction equipment; and - A temperature management and alarm system in the baghouse. 3. The Proponent would construct the SPL facility so that it incorporates: <ul style="list-style-type: none"> - Bunding of truck loading areas to prevent potential contamination of nearby drains and stormwater run-off channels; - The rotary kiln would be fitted with blast panels to minimise the potential for explosion damage to the kiln shell; and - An interlock would be fitted to the water supply system and induction fan.
Human Health	<ol style="list-style-type: none"> 1. The environmental controls as listed in Section 2.4 of this EA would be implemented.
Traffic and Transport	<ol style="list-style-type: none"> 1. Operate in accordance with the Road Transport Act 2013. 2. Construction vehicles carrying loose materials to and from the site would be covered after loading (prior to traversing public roads) to prevent wind-blown dust emissions and spillages. 3. In the event of a spillage of materials from construction vehicles onto a public road, the RMS & EPA would be notified and the spilled material would be removed. 4. Construction traffic would only traverse those public roads as outlined in the EA, which are public roads that are suitable for heavy vehicles. 5. Additionally, adequate on-site parking would be provided for construction traffic so that no construction vehicles would be parked on the surrounding road network. <p>The following specific traffic mitigation measures would be applied to the Project during operation:</p> <ul style="list-style-type: none"> • Site access procedures including the proposed haulage route would be communicated to site personnel and heavy vehicle operators. • Trucks would ensure loads are appropriately covered and sealed to protect transported material from wind and rain.
Noise and Vibration	<ol style="list-style-type: none"> 1. The Proponent would implement noise mitigation strategies to achieve the following: <ul style="list-style-type: none"> - Operational noise levels are maintained at 10 dB(A) below the existing Leq noise level of the smelter; and - The L1 (1 min) level of any specific noise source would not exceed the background noise level (L90) by more than 15 dB(A) when

Issue	Safeguard
	<p>measured outside the bedroom window of the nearest residential receiver (in accordance with DECC's Environmental Noise Control Manual).</p> <ol style="list-style-type: none"> 2. The Proponent would implement noise mitigation strategies in the CEMP, including but not limited to the following: <ul style="list-style-type: none"> - Unless otherwise agreed by DECC, construction activity, likely to impact on sensitive receivers, would only occur during the period: <ul style="list-style-type: none"> ▪ 7.00am to 6.00pm Monday to Friday; ▪ 8.00am to 1.00pm Saturday; and ▪ No work on Sundays or public holidays. 3. Construction noise shall not exceed 5 dB above background levels (as prescribed by EPA Environmental Noise Control Manual criteria).
Waste	<ol style="list-style-type: none"> 1. All construction waste would be classified in accordance with the Waste Classification Guidelines (EPA, 2014) prior to disposal and transported to an appropriately licensed waste disposal facility. 2. The site EMP would be reviewed and updated following approval of the Project as modified, if necessary. 3. A variation to EPL 13269 would be sought to provide for the revised site layout and emission points following approval of the Project. 4. The EHC Licence (#88) would be reviewed following approval of the Project and if required a variation sought to maintain consistency. 5. SPL material would be maintained under cover within Shed 5 prior to processing. 6. Exposed treated product would be maintained in a moist condition to prevent dust rising. Treated product would be stockpiled within Shed 6.
Water and Soil	<ol style="list-style-type: none"> 1. The Stormwater Management Plan would be reviewed and updated to accompany the modified Project 2. The Proponent shall implement all practicable measures to minimise the discharge of sediments, contaminants and pollutants to surface and ground water as a result of the operation of the facility. 3. The Proponent shall ensure that all drains and stormwater channels outside the SPL bunded area are directed to the existing site first flush pond. 4. The Proponent shall ensure there is no outside truck loading in the SPL facility during rain periods. 5. The Proponent shall implement ground water and surface water quality management strategies in the CEMP.