The following report was prepared by the Complex Community Liaison Adviser and Complex Environmental Adviser in consultation with the community, Complex companies and the City of Hobsons Bay.

YEAR IN REVIEW:

Two new faces joined the Group over the year. A welcome was extended to Valerie Gemmell, resident from Curlew Avenue and Del Blake, General Manager of Manufacturing from Qenos Pty Ltd (formerly Kemcor Australia). Cr Carl Marsich continued as Chairperson with Judy Hindle, as Deputy Chairperson. More recently, the Group congratulated Cr Marsich on his elevation to Mayor of the City of Hobsons Bay.

Congratulations was also extended late last year to ACNCG member and Altona resident, Judy Hindle for being awarded “Most Environmentally Conscious Individual” under the Keep Australia Beautiful Victoria, City Pride Awards. The award recognised Judy’s efforts in environmental conservation, ACNCG and other community activities. Judy was also the recipient of the 1999 Salvation Army Good Samaritan Award for Hobsons Bay.

Meetings have been more streamlined as a result of a proposal submitted Judy Hindle to restructure meeting procedures. The format will be reviewed at the Group’s Annual General Meeting held on June 8, 2000.

Public concern and community interaction at meetings has been heightened this year as a result of a number of environmental incidents at Qenos with a number of people outside of the ACNCG attending meetings and voicing concern. It is appreciated that whilst the year has been difficult, the Group has been strengthened in its resolve to ensure environmental improvements. Regular attendance by Council officers and representatives of Workcover, EPA, City West Water and the City of Hobsons Bay has been acknowledged and the Group is pleased that an improved working relationship with the regulatory authorities has been developed over the year.

BASELINE PROGRAMS:

The Consultative Chronicle continues to be the principle method of communicating between the ACNCG and the wider community. There are four editions per year - February, April, August and November – which are
distributed to 10,000 homes and businesses in Altona. It is pleasing to note that the City of Hobsons Bay has agreed to continue to sponsor one edition per year.

All of the Complex companies delivered their annual reports to the Group.

Site alarms continue to be tested at 8.30 every Tuesday. The Complex maintains its support of the Environmental Action Line system and this year has introduced a message bank service that will take multiple incoming calls.

ACNCG representatives worked with Council to update and graphically develop the Altona Complex Community Awareness and Emergency response procedures. The revamped fridge magnets were distributed to local residents in December, 1999.

INITIATIVES:

The Altona Complex opened its doors to the public on March 25, 2000 with an estimated 1,200 visitors taking the opportunity to visit the chemical industry. ACNCG members set up a community stand at the Qenos central display area and were available to speak to the public about the Group and its objectives.

COMMUNITY OUTREACH:

Members of the Group have continued to be available and address various functions on the community consultation and ACNCG activities. Community representation to the Australian Primary Producer of Food and Dairy Industry, Women of the West group and involvement in the Major Hazardous Health and Safety week are an example of organisations who have been given presentations by members of the ACNCG.

THE YEAR AHEAD:

The ACNCG were the recipients of a Federation grant of $44,000 for a landscape beautification/community project. The Promenade of Federation will depict significant milestones along Kororoit Creek Road (from Maidstone Street to Qenos Resins site) and celebrate the successful integration of industry, community and the environment. ACNCG representatives will work with Council and Altona’s Secondary College Horticultural Centre to develop a living artwork incorporating flora and historical memorabilia to celebrate the past 100 years. It is expected the project will be completed mid next year. Groundwater remediation at Dow and Australian Vinlys will continue to be monitored and progressed by the Group. Qenos is in the process of developing a groundwater management plan with its EMT groups.
The Group will meet at least once a year for the purpose of reviewing the performance, objectives and general health of the ACNCG. An independent facilitator will conduct the meeting.

To ascertain community perceptions of Qenos and the Altona Complex operations in the immediate area, Qenos will be undertaking a Community Attitude Survey as part of their Environment Improvement Plan. The results will be communicated through the Chronicle.

**COMPANY AND COUNCIL REPORTS:**

**Australian Vinlys – Altona**

Highlights for the year:

We were disappointed to have two significant incidents during the year. In September, PVC resin escaped from a drier and was carried by the wind to the neighbouring Qenos resins site. The installation of detection equipment to raise the alarm if resin is lost from the driers is part of the EIP, and we are working through the technical aspects of that project. In December, we lost < 50 L of vinyl chloride monomer when equipment was being taken out of service for maintenance. This led to a review of the ways in which we coordinate major maintenance, and also of the permit to work system.

There were two injuries requiring more than First Aid treatment during the year. One was a broken finger sustained while stretch wrapping equipment was being cleared of accumulated stretch wrap. The other was a fractured elbow caused by a slip and fall on smooth concrete made slippery by rainwater.

The plant made extensive preparations for Y2K, which included changes to equipment and software, and we were confident that we were fully prepared. Because we could not be sure that gas, water, electricity and emergency services would function as normal, we decided to stop production for two days until it was clear that all the external services were functioning as normal.

We have reached agreement with City West Water on a new Trade Waste Agreement. The plant is proud of the fact that it maintained 100% compliance for the duration of the previous Trade Waste Agreement, from 1990 to 1999. We have also reduced the quantity of effluent discharged by a sustained effort to recycle water, and we are looking for more ways to save water.

EPA audited the site to check that licence conditions were being complied with. No non-compliances were found.

The Environment Improvement Plan is giving good results, with most work being implemented on schedule, and some ahead of schedule. A few jobs have fallen behind, generally because they have proven to be bigger tasks than we had realised, but we’ll catch up in the coming year.
We had two plant inspections by the Environment Management Team during the year. These were held on Sunday mornings, with breakfast provided, and involved the Managing Director or General Manager, so that residents could talk directly to the most senior decision makers in the business.

EMT and Groundwater Management Team meetings were held throughout the year.

We expect to commission the pilot facility to remove chlorinated hydrocarbon contamination from groundwater in about September/October 2000. Preparatory civil works have been completed.

We were delighted that the Laverton and Altona plants jointly received an “Outstanding Achievement – Manufacturing Category” in the State Government 2000 Energy Smart Awards. We have achieved a lot in energy saving, and aim to achieve more.

**Australian Vinlys – Laverton**

Highlights for the year:

- September 1999 - Greenhouse gas emissions from the production for the year ending September 1999 are 624kg CO2 equivalent per Tonne of PVC produced compared to the previous year’s figure of 669 kg. Results to May 2000 suggest that our target for this year of 590kg will be achieved.

- October 1999 - Prescribed waste system for disposal of packaging around organic peroxides is installed. This issue became apparent during initial walk around for the EIP development with community members.

- December 1999 - Effluent cooling tower installed to lower effluent discharge temperatures. This has allowed discharges to remain continuous at all times during the summer.

- December 1999 - 2 losses of containment of diesel from temporary pump operations which were running to cool effluent prior to commissioning of cooling tower.

- January 2000 - plant shuts down for the New Year. No Y2K problems experienced.

- February 2000 - Laverton Plant starts work on an Exemplar Safety Case working closely with WorkCover to work through the processes required to comply with the new Major Hazard Facility Regulations
• March 2000 - Dust extractions system on reaction additives floor completed. Significantly improves air quality for operators in the area.

• April 2000 - Laverton Plant completes a year without a recordable injury (ie nothing more severe than a First Aid injury) for employees, contractors and visitors.

• May 2000 - 6 new operators start at AV to start pre-training before new shift formed on July 1 2000 as plant moves from a 4 shift roster to 5 shift roster with a training day every 5 weeks

• May 2000 - Work completed for preparation of Environmental Improvement Plan for the Laverton Site. The EIP has been agreed in principle and is now undergoing final assembly before formal consideration by the EPA, City West Water and WorkCover. We expect the document to be ready for signing by 31 July 2000. Thank you to those members from the community, the authorities and Laverton Plant for the effort put into achieving this outcome.

BASF:

BASF was chosen as host of the launch of the National Pollutant Inventory (NPI) database. The Federal Environment Minister, Senator Robert Hill and the Victorian Minister for Environment and Conservation, Sherryl Garbutt, launched the NPI on January 28, 2000. The audience comprised local residents, neighbouring complex companies, the Victorian Environment Protection Authority, and representatives of the Plastics and Chemical Industries Association and the Minerals Council of Australia.

BASF second EIP is nearing completion and the Environmental monitoring team are presently formulating a new EIP. The results from the previous two EIP have seen a major reduction in emissions from the site and are currently well below our EPA discharge limits.

The company reports that capital spending on upgrading environmental and safety systems has continued. A dedicated concrete bunded area is currently being commissioned which will prevent spills and leaks from entering either stormwater or the effluent plant. Other capital works programs included upgrading of an agitator to improve production and reduce the level of monomer discharging to sewer, water and heat recovery trials from the thermal oxidiser.

BASF Dangerous Goods Licence was amended during the year with changes approved for the installation of a new diesel tank and a pH dosing system for the effluent. An amended Trade Waste licence is also being developed and is expected to be in place by May 2000.
City of Hobsons Bay:

The beginning of the year saw sporadic attendance by Council officers. This was not due to a lack of commitment but a question of resources spread thin. A rethink of our priorities has resulted in commitment at senior level to support and contribute to the ACNCG process.

Whilst the increased number of pressure valve releases and the very public butadiene release from Qenos was a low point in the year it has been the catalyst for some positive developments.

- Council strengthened its role as a facilitator, working with and between industry, regulatory authorities and the public.
- It acted as a “wake up call” to industry, residents, and regulatory authorities.
- Qenos questioning its “culture” and “accepted standards.”
- Pressure Management Review, EIP review.
- A project is continuing to develop protocols between Council, EPA and the Department of Human Services for the management of public health communication and support to residents arising out of critical incidents.

Council was pleased to support the production and distribution of Y2K public information and the presentation by Del Blake, Nessie Hardy and the Mayor, of City of Hobsons Bay, Cr Carl Marsich on Major Hazard Facilities to the Health and Safety Week Seminar at Darebin.

Council completed a Cooling Tower study relating to Legionnaires disease and we are pleased to see the results of that research being used to assist the State Government in its deliberations on strategies to reduce the likelihood of Legionella infections.

Through our joint work on ACNCG and various committees and working groups the relationship between the EPA and Council has strengthened and improved. We now have greater understanding, communication and cooperation.

Council supports and wishes the ACNCG success in pursuing its objectives in the coming year. Council recognises the Group as a valuable community forum and an excellent example of what can be achieved through open communication, sincere inclusion of stakeholders in decision making and partnerships. The fact that the Group is continuing should not be taken for granted as it takes energy, time and commitment to maintain its worth.

Congratulations to all participants for their dedication, work and contributions over last year and Council hopes the Group continues its on-going commitment to the environment for the coming year.
Dow Chemical:

With the completion of Dow’s Groundwater Management Plan, the Dow Groundwater Consultative Group combined with the Dow Environmental Monitoring Team (EMT) resulting in the addition of 3 members to the Dow EMT. A fourth new member also joined in 1999. This year we have continued to involve plant operators in EMT meetings.

During the year the EMT reviewed the Dow Environment Improvement Plan (EIP) accepting a range of new plans proposed by Dow. In December 1999 a consolidated update of the Dow EIP was issued to EMT members, EPA and the City of Hobson’s Bay. A copy was provided for the Altona Library.

Two EMT meetings (one regular and one extra meeting) in September 1999 were devoted to review of the Groundwater Management Plan. A range of updates was incorporated to reflect the outcomes of the hot spot clean up trial and the routine groundwater monitoring results. Dow is currently conducting a pilot of an alternative groundwater treatment system. This pilot is progressing on schedule.

In November 1999 the EMT conducted a site visit. The group identified a number of areas for improvement, which have been included in the EIP.

The EMT has agreed on a Community Notification Protocol for incidents occurring at Dow. An EMT member participated with the Dow team investigating a serious injury that occurred in February.

In May 2000 the EPA encouraged the EMT to take a fresh look at the foundation document of the EIP, acknowledge the achievements and look at future opportunities e.g. greenhouse gases. A process and timeline for this review will be determined at the November 2000 EMT meeting.

Review of the EIP will be a key focus for 2000/01 along with community consultation associated with the forthcoming Major Hazard Facility Regulations.

Dow gratefully acknowledges the valuable involvement and assistance of all the members of the EMT and would like to thank them for their considerable efforts.

Qenos Pty Ltd:

In July 1999, Orica Limited and Kemcor Australia Ltd combined their polyethylene, polypropylene, synthetic rubber and engineering plastics operations into a new joint venture. Qenos, the name of the new joint venture, was announced last October.
At the end of last year, Qenos Pty Ltd employed about 1210 people, of which 863 are based in Altona.

1999 was a disappointing year for environmental performance because of community concerns triggered by pressure safety valves incidents at the Olefins that resulted with high impact on local residents. Qenos has been prosecuted by the EPA over the incident and has pleaded guilty to the charge of polluting the atmosphere. Sincere apologies were communicated to local residents by means of a letterdrop.

Thorough reviews with extensive community involvement were initiated and have highlighted areas where improvements can be made. Qenos is committed to reduce the frequency of PSV releases from the Olefins plant to one per year and ensuring that those releases that may cause unacceptable community impact are piped to flare.

Owing to these incidents, the EPA initiated a review of Qenos’ accredited licence status. This review encompassed inputs from Qenos, residents and the Council. After extensive consultation, the EPA maintained the accreditation under the following conditions:

- Performance to be reviewed after six months;
- Qenos to incorporate its PSV commitments into their EIP with specific milestones;
- The accredited licence audit scope be widened to cover actual performance and environmental risk.

Despite these significant issues, Qenos’ overall environmental performance has continued to improve. The total number of environmental incidents was 35% lower than last year and in particular the reduction in incidents from 14 to 1 at Plastics was a highlight. Qenos also achieved a significantly improved personal safety performance in 1999.

While reported legionella levels in cooling water raised concerns during the year there were no cases of Legionnaires Disease associated with Qenos. However, as a result of extensive community and employee input, improved communication systems and cooling water management resulted.

Major EIP items completed during 1999 were:

- The installation of the community noise meter and regular reporting of the noise data to the EMT.

- Environmental Awareness training for all operators at Olefins, Elastomers and Resins.
Completion of Environmental Leadership training at Olefins and Elastomers.

A project to improve removal of VOC’s especially benzene from wastewater was substantially completed.

Stormwater/fire water retention lagoon is in the process of construction at Elastomers.

A significant reduction in VOC emissions was achieved in 1999 and the reduction in emissions of benzene and butadiene has continued.

As predicted there were no problems with Y2K and plants functioned smoothly over the New Year period.

As part of World Environment Day celebrations, members of the community and employees planted 400 trees at Qenos’ Plastics site. This also fulfills EIP commitments to reducing the visual impacts of Qenos sites.

We wish to take this opportunity to thank our EMT members for their commitment and personal contribution to the success of the EMT program and especially for their involvement in our Environmental Leadership Training.

Environment Protection Authority Annual Report

INTRODUCTION

From EPA’s perspective, the ACNCG has faced a number of significant challenges during the 1999 – 2000 period.

Environmental performance varied significantly between the Complex companies, with a disappointing number of incidents and complaints recorded overall.

EPA is always disappointed to initiate enforcement action against companies, especially major companies with a stated corporate commitment to protecting the environment. EPA’s Enforcement Policy continues to provide the framework for EPA in making decisions about taking enforcement action. We hope that the year ahead will not provide us with as many situations where enforcement action is necessary against the Complex companies.

Environment Improvement Plans for all of the Complex companies have continued to progress. Companies are continuing to be committed to the EIP
concept. The continued participation of residents ensures that EIPs remain a key mechanism for meeting the community’s expectations. EPA appreciates the time that residents spend attending community meetings.

Investigations into groundwater have progressed significantly across the Complex. It is encouraging to see substantial commitments being made by some of the Complex companies towards resolution of groundwater issues.

A number of other positive achievements in improving environmental performance were recorded during the year. Substantial reductions in waste generation have been positive achievements for some companies; maintaining relatively low levels of emissions have been achievements for others.

COMMUNITY CONSULTATION

EPA is pleased to see continuing support of the ACNCG by the resident members. It is also pleasing to have seen a number of new participants during the last 12 months.

The Altona Consultative Chronicle continues to be an important communication tool for the group to the local community.

Some issues that have been raised surrounding the use of the Complex Environmental Action Line have been resolved by additional training for the people manning the phone and by supplying additional lines to allow the system to handle more than one call at a time. EPA hopes that the companies continue to support the system.

The reporting of incidents from companies directly to the resident members of the ACNCG has been launched across all companies following discussion at ACNCG meetings.

ACCREDITED LICENSEE PROGRAM

EPA’s accredited licensee program faced a challenge during 1999 in relation to resolving the action to be taken about a period of poor performance at a site with an accredited licence.

Qenos’ accreditation was reviewed during October and November 1999 following a perceived period of poor performance. This related to a number of pressure safety valve releases at Qenos Olefins and considerable community concern. The review was undertaken by Mr. Dennis Monahan, EPA’s Director Commercial and Industry Services.
The review recognised that Qenos’ longer term performance in reducing emissions to atmosphere and waste generation had been high, and also that the company’s performance had been poor in the months immediately preceding the review. The review also recognised that the local community did not currently trust Qenos enough for a meaningful EIP process to be in place.

Qenos made a number of commitments to improving the performance of the Olefins site. These included conducting a review of pressure management at the Olefins site which involved EPA and the community, and a commitment to make a number of modifications to equipment and procedures at the Olefins site to reduce the number of pressure safety valve emissions to atmosphere.

EPA decided in April 2000 not to revoke Qenos’ accreditation following the commitments made by Qenos and feedback from community members. The community members stated that they felt that Qenos had made substantial commitments towards improving their environmental performance and that communication with the local community by Qenos had substantially improved.

The accredited licensee program fundamentally involves participation by the community. Community members were involved in the review and contributed significantly. The positive outcome that was achieved was in a large part due to the involvement of the community members.

BASF’s accreditation has continued and the company has continued to maintain its environmental performance.
INDIVIDUAL COMPANIES
Complaints and Incidents – Summary

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<tr>
<td>Qenos – Resins</td>
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</tr>
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AVC – Altona Premises

- Complaints and Incidents
  
  One complaint was recorded against AVC Altona for offsite discharge of PVC pellets.

  AVC Altona recorded one incident for the year on 21 December 1999 which was a 50 kg VCM release. EPA was satisfied with the response to this incident.

  For both AVC sites, performance monitoring showed good compliance with licence and SEPP limits for the year.

- Enforcement Action

  No enforcement action was taken against AVC Altona.

- Environment Improvement Plan

  AVC Altona continued to progress against their existing EIP.
• Groundwater

AVC is continuing progress on remediating groundwater contamination at its Altona site. A Research, Development and Demonstration approval was issued to PPK Consulting on 18 April 2000 for construction of equipment at the site to treat contaminated soil and groundwater.

**AVC – Laverton Premises**

• Complaints and Incidents

AVC Laverton recorded one incident for the year on 12 May 1999 which was a 3.5 tonne VCM release through steam traps at the site. The details of this release were discussed at EMT meetings.

For both AVC sites, performance monitoring showed good compliance with licence and SEPP limits for the year.

• Enforcement Action

Australia Vinyls Corporation pleaded guilty to a charge of environmental hazard on 23 February 2000 in relation to a release of 400 kg VCM from their Laverton plant in November 1998.

• Environment Improvement Plan

AVC Laverton has developed an EIP which is ready to be approved by all parties. It is pleasing to see AVC commit to the EIP approach for their Laverton plant.

• Groundwater

Soil contamination at the AVC Laverton site resulting from activities at the adjacent Pigment Manufacturers of Australia (PMA) site has been discussed during the development of the Laverton site EIP. Groundwater monitoring has shown some contamination. PMA are reviewing their management plan for the site and will report to EPA and the AVC Laverton EMT group later in 2000.

**BASF**

BASF volunteered to host the launch of the National Pollutant Inventory (NPI) on 28 January 2000. The National Pollutant Inventory makes environmental emission information from a wide variety of sources, including industrial sites, available on the Internet. The NPI was launched by Senator Robert Hill, the Commonwealth Minister for the Environment. The event was attended by government and industry representatives.
• Complaints and Incidents

No complaints were made about BASF during the 12 month period.
BASF did not record any incidents for the year.

• Enforcement Action

No enforcement action was taken against BASF.

• Environment Improvement Plan

BASF continued to progress against their existing EIP. Their next EIP is currently in development.

• Groundwater

Groundwater monitoring at BASF has not shown any change in groundwater at the site over the last 12 months.

Dow

• Complaints and Incidents

No complaints were made about Dow during the 12 month period.
Dow recorded 3 incidents for the year, all of which were spills contained onsite. Modifications either were made or are planned in all cases to prevent a recurrence of any of these situations.

• Enforcement Action

No enforcement action was taken against Dow.

• Environment Improvement Plan

Dow continued to progress against their existing EIP.

One significant environmental achievement that should be recognised is the implementation of a project in the Latex plant to eliminate the discharge of
ammonia rich wastewater to sewer. The quantity of waste that has been eliminated from discharge to sewer is in the order of 12 megalitres of wastewater per year and 3 tonnes of ammonia. The project was progressed with involvement from City West Water and EPA.

- Groundwater

Dow were issued with a Research, Development and Demonstration approval for air sparging and soil vapour extraction from an enhanced fragmentation zone. This project was to increase the porosity of the basalt aquifer by blasting, and then to treat extracted groundwater in specifically installed equipment.

The blasting was carried out successfully on 15 April 2000 with EPA present. EPA is continuing to review the progress of Dow’s groundwater management plan.

**Qenos**

- Complaints and Incidents

No complaints were registered against Qenos Resins or Qenos Elastomers for the 12 month period.

A number of complaints were recorded against the Qenos Olefins and Plastics sites for the 12 month period. The breakdown is shown in section 0. A number of the complaints corresponded to reportable incidents.

Qenos is in a position to demonstrate considerable improvement in its complaints performance over the next 12 months.

Qenos reported a number of incidents for the period. The Olefins plant recorded a number of significant pressure safety valve emissions to atmosphere during the period. Most significant was the release of three tonnes of butadiene from distillation column T-509 on 18 July 1999 which resulted in 11 complaints to EPA. Olefins also recorded a number of spills which did not extend offsite. Elastomers recorded one latex spill. Plastics recorded an offsite discharge of polyethylene.

The Qenos Pressure Management Review was set up with the aim of reducing the number of pressure safety valve releases from the Olefins site. A substantial amount of work has occurred and a number of commitments to improved pressure management at the Olefins site have been made. The coming twelve months will demonstrate whether the actions already taken and further actions proposed will reduce the number of releases at Olefins. The ACNCG has a
significant role to play in terms of assessing whether Qenos has met its public commitments.

- **Enforcement Action**

  Kemcor Australia (now Qenos) received a Penalty Infringement Notice in June 1999 for the breach of a licence condition in relation to the late submission of their annual report to EPA.

  Qenos have also been charged by EPA with air pollution and breach of licence in relation to the release of butadiene from the pressure safety valve on distillation column T-509 on 18 July 1999. At the time of writing the hearing is expected to occur on 9 June 2000 at the Sunshine Magistrate’s Court.

- **Environment Improvement Plan**

  The Qenos EMT meetings have stewarded the projects completed under the 1998 Kemcor EIP. The Kemcor EIP that was signed in 1998 has nearly reached the end of its three year life and so development of the next EIP has begun. A new format for the next EIP has been discussed at the EMT meetings.

- **Groundwater**

  Investigations at the Qenos Plastics, Resins and Elastomers sites to date have not revealed contamination which appears to result due to the Qenos operations. Investigations at the Olefins site has revealed benzene contamination onsite. Qenos has committed to producing a groundwater management plan by the end of 2000.

**CHALLENGES FOR THE YEAR AHEAD**

**Groundwater management**

Groundwater contamination continues to be a significant issue for the Complex and will be so for the foreseeable future. EPA expects to see a groundwater management plan from Qenos during the next 12 months. EPA also looks forward to evaluating the results of work at Dow and AVC.

**Performance at Qenos**

Qenos has made a number of commitments to improving its performance at the Olefins site. Due to the nature and the scale of the works involved, they will take some time to complete. The ACNCG will have a significant role to play in
assessing whether Qenos has met its commitments and whether its performance has improved.

**Environmental Noise**

Environmental noise has been mentioned in previous EPA annual reports. The installation and commissioning of the Charles Rd noise meter will provide information about the actual impact of noise from the Complex companies. Results are now being regularly reported to EMTs. EPA hopes that the availability of this information will now help evaluate noise abatement projects and result in a reduction in environmental noise.

**Implementation of Major Hazard Facility Regulations**

The Victorian Workcover Authority expects the Major Hazard Facility Regulations to be declared during 2000. EPA looks forward to working with VWA as needed in implementation of these regulations at the Complex companies.