

Rocglen Coal Mine

2013 Independent Environmental Audit - Action Plan

PROJECT APPROVAL 10_0015 NON COMPLIANCES

Condition	Evidence	Proposed Actions/Response	Due Date	Progress Update
2.1	The site inspection and audit of compliance documentation found no significant issues relating to environmental management at the site. However several non-conformances have been identified as documented in the compliance checklists and summarised in this report.	Noted. Non-compliances to be addressed in this action plan.	N/A	
2.2 (d)	A number of non-compliances with the Project Approval were identified during the audit as noted in this report.	Noted. Non-compliances to be addressed in this action plan.	N/A	
3.1	A review of monitoring data identified an exceedance of 1 dB at 'Surrey' location 28 September 2012 of the daytime maximum of 35 dB. No other exceedances were identified for the audit period. Whitehaven continues to monitor noise levels in accordance with its approved Noise Monitoring Program and has also acquired a real time noise monitor which has been located at several residences to monitor noise levels as a result of complaints. It is considered that Whitehaven's actions in investigating the noise exceedances and the continued monitoring is appropriate and no further actions are considered to be required.	Quarterly attended noise monitoring is to continue at 'Surrey' and the option of real time noise monitoring to be used if further noise exceedances are identified or the landholder raises concern.	Ongoing	
3.11	Rocglen do not currently seek approval for individual blasts from Gunnedah Council when road closures are required. Council has approved the Road Closure Management Plan prepared by Rocglen for occasions when blasting will be within 500 metres of a public road and Rocglen are relying on this approved Plan as evidence of Council approval. However, it was noted that the Road Closure Management Plan also identifies that notification will be to the Council's Engineering Services Division by at least 12 noon on the day prior to the road closure. This is currently not undertaken.	Whitehaven is to liaise with Gunnedah Council to ascertain their requirements in relation to approval of blasting and modify the Road Closure Management Plan accordingly. It will be Whitehaven's intention to remove the requirement for Council approval prior to each blast, if Council is accepting of this approach.	August 2013	
3.22	Water Management Plan (under PA 10_0015) submitted 6 March 2012. Although technically non-compliant, the submission of the Water Management Plan six days after the nominated due date is not considered to have any material effect on the environmental performance of the operations. No further action is considered to be required.	Noted.	N/A	
3.25	Letter sighted (dated 20 May 2011) advising that Stage 1 of the Wean Road works had been completed to Gunnedah Shire Council's satisfaction. Work on the Wean Road diversion has been completed but the tar seal to the boundary has not yet been completed. It is understood that Whitehaven has actions currently in progress to facilitate the upgrade and tar sealing of Wean Road required by this condition and no further actions are considered to be required. Compliance with the condition should be verified at the next audit.	The road works to the shire boundary are in progress, in consultation with the Gunnedah Shire. The road upgrade is expected to be completed by the 31 st August 2013.	31 st August 2013	

Condition	Evidence	Proposed Actions/Response	Due Date	Progress Update
5.6	Discharge of sediment laden water from dam SD3 occurred 21 February 2012, reported via letters to DP&I and EPA 1 March 2013, eight days later. An incident report was submitted to EPA on 9 March 2012, a further eight days later. Written notification of the incident did not occur within seven days of the incident.	Whitehaven is to ensure notification of incidents takes place within seven days of the incident.	Ongoing	

ENVIRONMENTAL PROTECTION LICENCE 12870 NON COMPLIANCES

Condition	Evidence	Proposed Actions/Response	Due Date	Progress Update
L1.1 & L2.5 (a)	Whitehaven received a Penalty Infringement Notice (PIN) for discharge on 21 February 2012 from SD3. Discharge occurred 21 February, reported via letter to Environmental Protection Authority (EPA) 1 March 2013. An incident report was submitted to EPA on 9 March 2012. Total Suspended Solids (TSS) from SD3 measured 340 mg/L with 25 millimetres of rain being recorded in the preceding five days. Therefore the licence exemption was not triggered and the exceedance represents a non-compliance with the licence condition. It was noted by the auditor that water management on site has significantly improved since the last audit with no discharge non-compliances reported since the February 2012 incident. Whilst Whitehaven should continue to monitor the effectiveness of its water management system to ensure no further unlicensed discharges occur, no further specific actions are considered to be required.	Noted. Current water management practices are performing well and are to continue.	Ongoing	
L3.1 (a)	A review of monitoring data identified an exceedance of 1 dB at the 'Surrey' location on 28 September 2012 of the daytime maximum of 35 dB. No other exceedances were identified for the audit period. Whitehaven continues to monitor noise associated with its operations as outlined in its approved Noise Management Plan and no further action is considered to be required. It was noted that the revised Noise Management Plan for the extension has been prepared and submitted but has not yet been formally approved. The previous Noise Management Plan therefore remains the approved Plan.	Quarterly noise monitoring is to continue at 'Surrey' with the option of real time monitoring to take place upon landholders concern. The Noise Management Plan prepared for PA 10_0015 has now been approved, with noise management to be undertaken in accordance with the plan.	Ongoing	
R2.1 & R2.2	Discharge of sediment laden water from dam SD3 occurred 21 February 2012, reported via letter to EPA 1 March 2013, eight days later. An incident report was submitted to EPA on 9 March 2012, a further eight days later. Written notification of the incident to the EPA did not occur within seven days of the incident. It was also noted that notification of the incident was not made to the Environment Line but rather was done by letter.	Incidents are to be reported to the environmental line and reports are to be sent to the EPA within 7 days of the incident.	Ongoing	

ENVIRONMENTAL MANAGEMENT PLANS RECOMMENDATIONS

Management Plan	Evidence	Proposed Actions/Response	Due Date	Progress Update
Blast Management Plan	Rocglen do not currently seek approval for individual blasts from Gunnedah Council when road closures are required. Council has approved the Road Closure Management Plan prepared by Rocglen for occasions when blasting will be within 500 metres of a public road and Rocglen are relying on this approved Plan as evidence of Council approval. However, it was noted that the Road Closure Management Plan also identifies that notification will be to the Council's Engineering Services Division by at least 12 noon on the day prior to the road closure. This is currently not undertaken.	Whitehaven is to liaise with Gunnedah Council to ascertain their requirements in relation to approval of blasting and modify the Road Closure Management Plan accordingly. It will be Whitehaven's intention to remove the requirement for Council approval prior to each blast, if Council is accepting of this approach.	August 2013	
Environmental Management Strategy	It was noted that the list of approvals included in Section 3.1 of the revised EMS does not include MPL 1662. It was also noted that although the list in Section 3.1 identifies water licences, it does not specifically identify which licences. In order to ensure that all of the appropriate approvals and licences are identified, it is recommended that further details of the approvals and licences be included in the EMS.	A similar table to that included in Table 1 of the 2011 to 2012 AEMR is to be included in an updated Environmental Management Strategy.	September 2013	
Noise Management Plan	Whilst the existing Road Traffic Noise Management Plan under PA 06_0198 was prepared in consultation with Tarrawonga Coal Mine, there does not appear to be a similar Plan or reference to the existing Plan included in the Noise Management Plan prepared under PA 10_0015.	The Road Traffic Noise Management Plan for Rocglen has now been approved on 21 st June 2013. This plan is consistent with the requirements of Tarrawonga Coal road haulage	Complete	

KEY ENVIRONMENTAL ISSUES

Area of Concern	Evidence	Proposed Actions/Response	Due Date	Progress Update
Hydrocarbon and Chemical Management	During the site inspection of the Rocglen operations, it was noted that where oils, greases and chemicals are being stored on banded pallets, there is potential for spills and leaks to extend beyond the pallet bund, particularly where containers are stacked or leaks occur under pressure.	It was noted during the audit that the most likely cause of spills in the hydrocarbon storage area would result from damage of containers during transport and placement and therefore personnel would be present to quickly relocate the damaged container and contain the spill using the nearby spill kit. Whitehaven to review the hydrocarbon and chemical storage practices for packaged oils, greases and chemicals stored at the Rocglen workshop, using the Technical Considerations in Appendix 2 of the 'Storage and Handling Liquids: Environmental Protection, Participant's Manual' (DECC 2007) as a guide.	September 2013	