

Werris Creek Coal (WCC) MP 10 0059 Independent Environmental Audit Action Plan v1 2014

MP 10_0059 Condition	Audit Finding	SLR Audit Team Recommendation	WCC Response and Due Date
<p>Schedule 2 Condition 8</p> <p>The Proponent shall not transport:</p> <p>b) any product coal from the site by public road to the Muswellbrook, Singleton, Mid-Western regional, Cessnock or Newcastle local government areas without the written approval of the Director-General.</p>	<p>Some coal goes out to Tamworth/Armidale/Guyra hospitals but no coal is currently transported by public road into the Muswellbrook, Singleton, Mid-Western, Cessnock or Newcastle local government regions.</p> <p>During the audit period WCC was non-compliant with this condition. SLR sighted a letter from DP&I dated 1 February 2012 regarding coal being transported by road to Newcastle without the Director General's approval (the Project Approval was granted on 25 October 2011). The DP&I considered it to be a non-compliance.</p> <p>DP&I did however grant approval to transport coal by road to the Muswellbrook, Singleton, Mid-Western regional, Cessnock or Newcastle local government areas until 30 June 2012.</p> <p>WCC responded to the letter from the DP&I on 13 March 2012 noting the conditions relating to road haulage and mitigation measures to ensure WCC meet this condition in the future.</p>	<p>None.</p>	<p>Contract with the particular domestic coal customer in Newcastle was changed from truck coal transport to 100% rail coal transport from July 2012.</p>
<p>Schedule 2 Condition 10</p> <p>The Proponent shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> · Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates (where necessary) for the proposed building works; and · Part 8 of the EP&A Regulation sets out the requirements for the certification of the project. 	<p>Construction certificate 109/2010-2 issued 27 June 2013.</p> <p>WCC does not yet have an occupation certificate. SLR understands the issue relates to the older demountable buildings not having emergency lighting. The project to install the emergency lighting is now expected to be delivered by the end of August 2014.</p>	<p>WCC to install emergency lighting and liaise with council regarding the occupation certificate.</p>	<p>Additional emergency lighting to be installed in August 2014. Obtain an Occupation Certificate from Liverpool Plains Shire Council by October 2014.</p>

Werris Creek Coal (WCC) MP 10_0059 Independent Environmental Audit Action Plan v1 2014

MP 10_0059 Condition	Audit Finding	SLR Audit Team Recommendation	WCC Response and Due Date																																				
<p>Schedule 3 Condition 1</p> <p>The Proponent shall ensure that the noise generated by the project (including noise generated on the Werris Creek Rail Spur) does not exceed the criteria in Table 1 at any residence on privately-owned land or on more than 25 percent of any privately-owned land.</p> <p>Table 1: Noise criteria</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Location</th> <th style="text-align: center;">Day dB(A) L_{eq}(15 min)</th> <th style="text-align: center;">Evening & Night dB(A) L_{eq}(15 min)</th> <th style="text-align: center;">Night dB(A) L₁(1 min)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">R18</td> <td style="text-align: center;">40</td> <td style="text-align: center;">37</td> <td style="text-align: center;">45</td> </tr> <tr> <td style="text-align: center;">R10, R11, R14</td> <td style="text-align: center;">39</td> <td style="text-align: center;">36</td> <td style="text-align: center;">45</td> </tr> <tr> <td style="text-align: center;">R20, R21</td> <td style="text-align: center;">39</td> <td style="text-align: center;">37</td> <td style="text-align: center;">45</td> </tr> <tr> <td style="text-align: center;">R12</td> <td style="text-align: center;">38</td> <td style="text-align: center;">36</td> <td style="text-align: center;">45</td> </tr> <tr> <td style="text-align: center;">R98</td> <td style="text-align: center;">38</td> <td style="text-align: center;">37</td> <td style="text-align: center;">45</td> </tr> <tr> <td style="text-align: center;">R7, R8, R9, R24</td> <td style="text-align: center;">37</td> <td style="text-align: center;">37</td> <td style="text-align: center;">45</td> </tr> <tr> <td style="text-align: center;">R22, R98</td> <td style="text-align: center;">36</td> <td style="text-align: center;">36</td> <td style="text-align: center;">45</td> </tr> <tr> <td style="text-align: center;">All other privately-owned land</td> <td style="text-align: center;">35</td> <td style="text-align: center;">35</td> <td style="text-align: center;">45</td> </tr> </tbody> </table> <p><i>Notes:</i></p> <ul style="list-style-type: none"> · To interpret the locations referred to in Table 1, see the applicable figure in Appendix 3; and · Noise generated by the project is to be measured in accordance with the relevant requirements and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy. <p>However, these criteria do not apply if the Proponent has an agreement with the relevant owner/s of these residences/land to generate higher noise levels, and the Proponent has advised the Department in writing of the terms of this agreement.</p>	Location	Day dB(A) L _{eq} (15 min)	Evening & Night dB(A) L _{eq} (15 min)	Night dB(A) L ₁ (1 min)	R18	40	37	45	R10, R11, R14	39	36	45	R20, R21	39	37	45	R12	38	36	45	R98	38	37	45	R7, R8, R9, R24	37	37	45	R22, R98	36	36	45	All other privately-owned land	35	35	45	<p>WCC Annual Environmental Management Reports (AEMR) 2013-2014, 2012-2013, 2011-2012 and associated monthly noise monitoring reports have been reviewed.</p> <p>As reported in the WCC AEMR 2013-2014 (refer Table 3.49) noise levels above the relevant criteria were measured at 3 locations (R5, R9 and R22) during July 2013 and one location (R97) during September 2013.</p> <p>These measured exceedances were reported by WCC to the DP&I via letters dated 24 July 2013 and 3 October 2013). These were the first measured exceedances of the relevant noise limits in 33 months.</p> <p>Noise levels greater than the noise criteria specified in Table 1 of PA 10_0059 Schedule 3 were measured during September 2013 at R98 however, it is noted that WCC had a negotiated agreement with this residence. AEMR 2013-2014 reports that this elevated noise level was in accordance with the negotiated agreement for WCC to undertake additional noise works and that double-glazing has been installed at R98.</p>	None.	<p>Additional private agreements successfully negotiated with R9 & R22 while R5 and R97 have not accepted the offer. Since exceedance in September 2013 all trucks are now attenuated.</p>
Location	Day dB(A) L _{eq} (15 min)	Evening & Night dB(A) L _{eq} (15 min)	Night dB(A) L ₁ (1 min)																																				
R18	40	37	45																																				
R10, R11, R14	39	36	45																																				
R20, R21	39	37	45																																				
R12	38	36	45																																				
R98	38	37	45																																				
R7, R8, R9, R24	37	37	45																																				
R22, R98	36	36	45																																				
All other privately-owned land	35	35	45																																				

Werris Creek Coal (WCC) MP 10 0059 Independent Environmental Audit Action Plan v1 2014

MP 10_0059 Condition	Audit Finding	SLR Audit Team Recommendation	WCC Response and Due Date																							
<p>Schedule 3 Condition 16</p> <p>The Proponent shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not exceed the criteria listed in Tables 6, 7 and 8 at any residence on privately-owned land or on more than 25 percent of any privately owned land.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 5px;"> <caption>Table 6. Long-term criteria for particulate matter</caption> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate (TSP) matter</td> <td>Annual</td> <td>* 30 µg/m³</td> </tr> <tr> <td>Particulate matter < 10 µm (PM₁₀)</td> <td>Annual</td> <td>* 30 µg/m³</td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 5px;"> <caption>Table 7. Short-term criteria for particulate matter</caption> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter < 10 µm (PM₁₀)</td> <td>24 hour</td> <td>* 50 µg/m³</td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <caption>Table 8. Long-term criteria for deposited dust</caption> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Maximum increase in deposited dust level</th> <th>Maximum total deposited dust level</th> </tr> </thead> <tbody> <tr> <td>Deposited dust</td> <td>Annual</td> <td>* 2 g/m²/month</td> <td>* 4 g/m²/month</td> </tr> </tbody> </table> <p><i>Notes to Tables 6-8:</i></p> <ul style="list-style-type: none"> · a Total impact (i.e. incremental increase in concentrations due to the project plus background concentrations due to all other sources); · b Incremental impact (i.e. incremental increase in concentrations due to the project on its own); · c Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method. · d Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents, illegal activities or any other activity agreed by the Director-General in consultation with EPA. 	Pollutant	Averaging Period	Criterion	Total suspended particulate (TSP) matter	Annual	* 30 µg/m ³	Particulate matter < 10 µm (PM ₁₀)	Annual	* 30 µg/m ³	Pollutant	Averaging Period	Criterion	Particulate matter < 10 µm (PM ₁₀)	24 hour	* 50 µg/m ³	Pollutant	Averaging Period	Maximum increase in deposited dust level	Maximum total deposited dust level	Deposited dust	Annual	* 2 g/m ² /month	* 4 g/m ² /month	<p>Concentrations of PM₁₀ (and PM_{2.5}), TSP and Deposited Dust are measured by TEOM, HVAS and deposited dust gauges at a number of locations surrounding the site.</p> <p>Results of the deposited dust monitoring program for the period April 2013 to March 2014 indicate that the annual average at all locations, with the exception of DG34, were below the criterion of 4g/m²/month. The elevated deposition at DG34 was likely due to local effects, given that surrounding dust gauges did not show a similar elevation. Dust deposition monitoring results for previous reporting years show compliance with the relevant criteria.</p> <p>Annual average PM₁₀ and TSP monitoring results for 5 HVAS monitoring locations (4 PM₁₀, 1 TSP) indicate compliance with the relevant criteria. Examination of the data from the Werris Creek PM₁₀ TEOM also indicates compliance with the annual average PM₁₀ criterion.</p> <p>Daily maximum PM₁₀ concentrations were shown to be in compliance at the Werris Creek TEOM. Examination of HVAS monitoring results for the period April 2013 to March 2014 indicate an exceedance of the 24hr PM₁₀ criterion at the HVP11 (Glenara) location with a monitored concentration of 56.4ug/m³. It is noted that significant discussion surrounding this exceedance has been provided within the AEMR (2013/2014) which examined upwind/downwind concentrations of PM₁₀ during the exceedance period. Although this analysis suggests that the contribution from the mine itself was of the order of 42.8ug/m³ and therefore in compliance with the incremental criterion, SLR note that the criterion is a cumulative criterion and represents "Total impact (i.e. incremental increase in concentrations due to the project plus background concentrations due to all other sources)".</p> <p>The criterion for maximum 24 hour PM₁₀ does include a statement to note that the concentrations "excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents, illegal activities or any other activity agreed by the Director General in consultation with EPA".</p>	<p>SLR recommends that WCC establish a method for determining extraordinary events using upwind/downwind HVAS results (the four HVAS are located at the four points of the compass). Additional consultation with the EPA is required if monitoring (WCC monitoring data and regional monitoring data) indicate the possibility of regional dust events.</p>	<p>WCC to discuss with the Department of Planning and Environment (DP&E) and Environment Protection Authority (EPA) regarding a methodology for upwind/downwind dust monitoring to determine dust source contribution and/or regional dust events by December 2014.</p>
Pollutant	Averaging Period	Criterion																								
Total suspended particulate (TSP) matter	Annual	* 30 µg/m ³																								
Particulate matter < 10 µm (PM ₁₀)	Annual	* 30 µg/m ³																								
Pollutant	Averaging Period	Criterion																								
Particulate matter < 10 µm (PM ₁₀)	24 hour	* 50 µg/m ³																								
Pollutant	Averaging Period	Maximum increase in deposited dust level	Maximum total deposited dust level																							
Deposited dust	Annual	* 2 g/m ² /month	* 4 g/m ² /month																							

Werris Creek Coal (WCC) MP 10 0059 Independent Environmental Audit Action Plan v1 2014

MP 10_0059 Condition	Audit Finding	SLR Audit Team Recommendation	WCC Response and Due Date
<p>Schedule 3 Condition 22</p> <p>The Proponent shall ensure that all surface water discharges from the site comply with the discharge limits (both volume and quality) set for the project in any EPL.</p>	<p>Volume limits do not apply to the EPL.</p> <p>2011/12 AEMR period - There were 21 discharge events during the AEMR period - criteria met.</p> <p>2012/13 AEMR period - There were 11 discharge events during the AEMR period - criteria met.</p> <p>2013/14 AEMR period - There were four discharge events during the AEMR period - criteria met.</p> <p>WCC is permitted to discharge when the dirty water quality is within the criteria specified in EPL 12290, however if a rainfall event greater than 39.2mm occurs in a consecutive 5 day period then the TSS limit does not apply.</p> <p>There was an uncontrolled discharge on 11 March 2012 from Void Water Dam 3. Void Water Dam 3 is not a licensed discharge point therefore this condition is non - compliant.</p>	<p>Automated float system to be installed in 2014.</p>	<p>Automated float switch alarm system to determine high water levels of Void Water Dam 3 and 4 will be installed in August 2014 and Void Water Dam 1 by December 2014.</p>

EA Statement of Commitments	Audit Finding	SLR Audit Team Recommendation	WCC Response and Due Date
<p>2.8 Retain all void water within the Void Water Dams or sumps within the open cut.</p>	<p>Penalty notice advised (24/09/2012) a mine water dam had failed and discharged into Quipolly Creek (Site reported to the EPA) - PIN issued x3. Previous event July 2007.</p> <p>The following actions have been completed to ensure effective management of surface water onsite:</p> <ul style="list-style-type: none"> • Engineering review on 3 major dams - redesign and reconstruct; • Operating level maintained; • Prescribed Dams (DSC); • 0.5m diameter pipe spillway capable of managing a 1 in 10,000 year 5 day storm event; • WCC Environmental Officer has completed DSC dam inspection report; • Void Management pumping (copy) dedicated; and • Real time monitoring system (SentineX/Observant) capable of sending alarms when High Water Levels are triggered. <p>WCC have made all reasonable attempts to ensure this incident will not happen again.</p>	<p>The WCC Environmental Officer is in the process of installing a float gauge to determine when the water level is near the capacity of the Void Dams (high water level alarm).</p> <p>Continue weekly inspections to review water levels.</p>	<p>Automated float switch alarm system to determine high water levels of Void Water Dam 3 and 4 will be installed in August 2014 and Void Water Dam 1 by December 2014.</p>

Werris Creek Coal (WCC) MP 10 0059 Independent Environmental Audit Action Plan v1 2014

EA Statement of Commitments	Audit Finding	SLR Audit Team Recommendation	WCC Response and Due Date
<p>14.2 Continue monitoring of piezometers and groundwater bores on and surrounding the Project Site in accordance with the current Groundwater Monitoring Program.</p> <p>To be completed both monthly and continuous (dependent on particular piezometer or groundwater bore).</p>	<p>2013-14 AEMR indicates groundwater monitoring (levels) is undertaken bimonthly, instead of monthly as per this commitment. SWMP is still in draft and outlines monitoring is completed bimonthly for water levels.</p> <p>The audit team considers monitoring every two months to be sufficient.</p>	None.	<p>Submit Site Water Management Plan for approval outlining bimonthly groundwater level monitoring by October 2014.</p>

EPL 12290 Condition	Audit Finding	SLR Audit Team Recommendation	WCC Response and Due Date
<p>L1.1</p> <p>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.</p>	<p>The Void Water Dam 1 discharged offsite on 11 March 2012. The PIN letter from EPA dated 24 September 2012 regarding the discharge of water from the dam noted the water had entered Quipolly Creek. With this being a discharge from a dam which is not a licensed discharge point, it is therefore classified as a 'pollutant' under section 120 of the Protection of the Environment Operations Act 1997.</p> <p>It should be noted that since this discharge there have been several changes including major upgrades to Void Water Dams (certified geotechnical/construction design), update to the SWMP, training, regular inspections and maintenance, correspondence with EPA and DP&I. An automated float system (high water alarm) will be installed in 2014 to monitor water levels of the Void Water Dams.</p>	Automated float system to be installed in 2014.	Automated float switch alarm system to determine high water levels of Void Water Dam 3 and 4 will be installed in August 2014 and Void Water Dam 1 by December 2014.

Werris Creek Coal (WCC) MP 10 0059 Independent Environmental Audit Action Plan v1 2014

EPL 12290 Condition	Audit Finding	SLR Audit Team Recommendation	WCC Response and Due Date																																								
<p>L4.1 Noise generated from the premises must not exceed the noise limits in the table below. The locations referred to in the table below are defined within Appendix 3 of Werris Creek Coal Mine, Extension Project Approval 10_0059:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Locality and Location</th> <th style="text-align: center;">Day LAeq (15 minutes)</th> <th style="text-align: center;">Evening LAeq (15 minutes)</th> <th style="text-align: center;">Night LAeq (15 minutes)</th> <th style="text-align: center;">Night LA1 (1 minute)</th> </tr> </thead> <tbody> <tr> <td>The residence on the property "Talavera" marked as location "R05" in Appendix 3 of Project Approval 10_0059</td> <td style="text-align: center;">38</td> <td style="text-align: center;">37</td> <td style="text-align: center;">37</td> <td style="text-align: center;">45</td> </tr> <tr> <td>The residence known as "Quipoly Rakeby Cottage" marked as location "R12" in Appendix 3 of Project Approval 10_0059</td> <td style="text-align: center;">38</td> <td style="text-align: center;">38</td> <td style="text-align: center;">38</td> <td style="text-align: center;">45</td> </tr> <tr> <td>The residence located at 83 Wachenella Lane marked as location "R7" in Appendix 3 of Project Approval 10_0059</td> <td style="text-align: center;">37</td> <td style="text-align: center;">37</td> <td style="text-align: center;">37</td> <td style="text-align: center;">45</td> </tr> <tr> <td>The residence on the property "Gedhurst" marked as location "R6" in Appendix 3 of Project Approval 10_0059</td> <td style="text-align: center;">37</td> <td style="text-align: center;">37</td> <td style="text-align: center;">37</td> <td style="text-align: center;">45</td> </tr> <tr> <td>The residence on the property "Lazakone" marked as location "R24" in Appendix 3 of Project Approval 10_0059</td> <td style="text-align: center;">37</td> <td style="text-align: center;">37</td> <td style="text-align: center;">37</td> <td style="text-align: center;">45</td> </tr> <tr> <td>The residence on the property "Mountain View" marked as location "R22" in Appendix 3 of Project Approval 10_0059</td> <td style="text-align: center;">36</td> <td style="text-align: center;">36</td> <td style="text-align: center;">36</td> <td style="text-align: center;">45</td> </tr> <tr> <td>Any other affected residences not owned by the licensee or its related companies</td> <td style="text-align: center;">35</td> <td style="text-align: center;">35</td> <td style="text-align: center;">35</td> <td style="text-align: center;">45</td> </tr> </tbody> </table>	Locality and Location	Day LAeq (15 minutes)	Evening LAeq (15 minutes)	Night LAeq (15 minutes)	Night LA1 (1 minute)	The residence on the property "Talavera" marked as location "R05" in Appendix 3 of Project Approval 10_0059	38	37	37	45	The residence known as "Quipoly Rakeby Cottage" marked as location "R12" in Appendix 3 of Project Approval 10_0059	38	38	38	45	The residence located at 83 Wachenella Lane marked as location "R7" in Appendix 3 of Project Approval 10_0059	37	37	37	45	The residence on the property "Gedhurst" marked as location "R6" in Appendix 3 of Project Approval 10_0059	37	37	37	45	The residence on the property "Lazakone" marked as location "R24" in Appendix 3 of Project Approval 10_0059	37	37	37	45	The residence on the property "Mountain View" marked as location "R22" in Appendix 3 of Project Approval 10_0059	36	36	36	45	Any other affected residences not owned by the licensee or its related companies	35	35	35	45	<p>Werris Creek Coal AEMRs 2013-2014, 2012-2013, 2011-2012 and associated monthly noise monitoring reports.</p> <p>As reported in the WCC AEMR 2013-2014 (refer Table 3.49) noise levels above the relevant criteria were measured at 3 locations (R5, R9 and R22) during July 2013 and one location (R97) during September 2013.</p> <p>The EPA acknowledged, via email communication to WCC dated 24 October 2013, that the exceedance measured at R97 would not need to be recorded as an incident in the Annual Return since the property does not have a residence on it.</p> <p>These measured exceedances were reported by WCC to the EPA via letters dated 24 July 2013 and 3 October 2013.</p> <p>These were the first measured exceedances of the relevant noise limits in 33 months.</p>	None.	<p>Additional private agreements successfully negotiated with R9 & R22 while R5 and R97 have not accepted the offer. Since exceedance in September 2013 all trucks are now attenuated.</p>
Locality and Location	Day LAeq (15 minutes)	Evening LAeq (15 minutes)	Night LAeq (15 minutes)	Night LA1 (1 minute)																																							
The residence on the property "Talavera" marked as location "R05" in Appendix 3 of Project Approval 10_0059	38	37	37	45																																							
The residence known as "Quipoly Rakeby Cottage" marked as location "R12" in Appendix 3 of Project Approval 10_0059	38	38	38	45																																							
The residence located at 83 Wachenella Lane marked as location "R7" in Appendix 3 of Project Approval 10_0059	37	37	37	45																																							
The residence on the property "Gedhurst" marked as location "R6" in Appendix 3 of Project Approval 10_0059	37	37	37	45																																							
The residence on the property "Lazakone" marked as location "R24" in Appendix 3 of Project Approval 10_0059	37	37	37	45																																							
The residence on the property "Mountain View" marked as location "R22" in Appendix 3 of Project Approval 10_0059	36	36	36	45																																							
Any other affected residences not owned by the licensee or its related companies	35	35	35	45																																							

Werris Creek Coal (WCC) MP 10 0059 Independent Environmental Audit Action Plan v1 2014

Mining Lease 1563 Condition	Audit Finding	SLR Audit Team Recommendation	WCC Response and Due Date
<p>Condition 16 (ML 1563)</p> <p>Operations must be carried out in a manner that does not cause or aggravate air pollution, water pollution (including sedimentation) or soil contamination or erosion, unless otherwise authorised by a relevant approval, and in accordance with an accepted Mining Operations Plan. For the purpose of this condition, water shall be taken to include any watercourse, water body or groundwaters. The lease holder must observe and perform any instructions given by the Director-General in this regard.</p>	<p>Void Water Dam 1 is located within this mining lease.</p> <p>The Void Water Dam 1 discharged offsite on 11 March 2012. The PIN letter from EPA dated 24 September 2012 regarding the discharge of water from the dam noted the water had entered Quipolly Creek. With this being a discharge from a dam which is not a licensed discharge, it is therefore classified as a 'pollutant' under section 120 of the Protection of the Environment Operations Act 1997.</p> <p>It should be noted that since this discharge there have been several changes including major upgrades to Void Water Dams (certified geotechnical/construction design), update to the SWMP, training, regular inspections and maintenance, correspondence with EPA and DP&I. An automated float system (high water alarm) will be installed in 2014 to monitor water levels of the Void Water Dams.</p>	<p>Automated float system to be installed in 2014.</p>	<p>Automated float switch alarm system to determine high water levels of Void Water Dam 3 and 4 will be installed in August 2014 and Void Water Dam 1 by December 2014.</p>

Additional Recommendations	Aspect	SLR Audit Team Recommendation	WCC Response and Due Date
<p>Schedule 3 Condition 5 of Project Approval</p>	<p>Identification of mining noise</p>	<p>The monthly noise monitoring reports report noise from Werris Creek Mine as "WCC XX" where XX is the estimated noise level contributed from WCC. If a specific mining noise source is a significant component to the measured noise level (i.e. not just mining activities); then It is recommended that it is identified when audible (ie rail loadout, trucks, dozer, etc).</p>	<p>Where practicable to identify a WCC noise source above "general mining hum", attended noise monitoring reports will specify the WCC noise source from August 2014.</p>
<p>Schedule 3 Condition 6 and 13 of Project Approval EPL – L5 EA Statement of Commitments – 7 ML 1671/1672 – Condition 10 ML 1563 – Condition 11</p>	<p>Blast Management</p>	<p>WCC receives a high level of blasting complaints from the communities of Werris Creek and Quipolly and mining operations are going to continue to advance closer to Werris Creek over the next decade. During the 2013-14 AEMR, WCC received 55 blast complaints from 23 complainants. SLR recommends a third party assessment is completed of blasting practices to determine if it is practicable and cost effective to modify current practices to further reduce community complaints. This assessment is to be undertaken by an expert in the field of blast management in consultation with the DP&I and EPA.</p>	<p>WCC to discuss with the DP&E and EPA regarding a third party blasting assessment to be completed by December 2014.</p>

Werris Creek Coal (WCC) MP 10 0059 Independent Environmental Audit Action Plan v1 2014

Additional Recommendations	Aspect	SLR Audit Team Recommendation	WCC Response and Due Date
Schedule 3 Condition 23 of Project Approval Statement of Commitments – 1.4	Groundwater	<p>The audit team endorses ENVIRONs recommendation to expand the groundwater monitoring database statistical analysis (Groundwater Monitoring Report - April 2014). 'To further assess the variation in groundwater levels, it is recommended that the groundwater monitoring database be expanded to include a statistical analysis of groundwater level variations using a statistical trending analysis such as one-sided cumulative sum analysis (CUSUM). These tools allow for identification of trends that are independent of background variation.'</p> <p>The WCC Environmental Officer is in the process of installing a float system to determine when the water level is near the capacity of the Void Dams (high water level alarm). Continue weekly inspections to review water levels.</p>	Annual cusum analysis of groundwater levels completed and reported in the Annual Environmental Management Report 2013-2014 completed in May 2014.
Schedule 3 Condition 25 of Project Approval	Biodiversity Offset Management Plan	Send the OEH a final copy of the BOMP for their records.	Send copy of Biodiversity and Offset Management Plan to OEH by August 2014.
Schedule 3 Condition 27 of Project Approval	Longterm security offsets	SLR recommends that WCC progress consultation with the DP&I in order to close out this condition regarding long term security for the offset area.	Last correspondence with DP&E in email dated 3 rd June 2014 was that lawyers were currently finalising comments on the wording of s88 instruments. BOA security to be completed by December 2014.
Schedule 3 Condition 37 and 38 of Project Approval	Visual Bund	Finalise the construction of the visual bund and revegetate the visual bund.	Mine planning for the Visual Bund has it scheduled to be completed in financial year 2014-2015 by June 2015.

Werris Creek Coal (WCC) MP 10 0059 Independent Environmental Audit Action Plan v1 2014

Additional Recommendations	Aspect	SLR Audit Team Recommendation	WCC Response and Due Date
<p>Schedule 3 Condition 39 of Project Approval</p> <p>EPL – O1.1</p> <p>Statement of Commitments – 11, 12.8</p>	<p>Waste</p>	<p>Develop a waste management plan for the site to document the waste management strategy for the site.</p> <p>Investigate options for implementing a total waste management service which includes the separation of all recyclable material as well as the oily waste.</p> <p>Training on oil spill response, clean up and general waste management is to be undertaken for all staff in the field of operations and maintenance.</p>	<p>WCC requested Expressions of Interest in June 2014 to supply a total waste management service to be awarded by October 2014. Waste Management Plan to be developed by December 2014. Spill response training to be rolled out by December 2014.</p>
<p>Schedule 3 Condition 42 of Project Approval</p> <p>ML 1671/1672 – Condition 7</p>	<p>Weed management</p>	<p>There were a couple of small areas where weeds are dominant. These areas are already known and have been fenced off and signed. Continue to implement the strategy to remove these weeds from site and complete additional rehabilitation once weeds are removed. See Photo 7 of this audit report.</p>	<p>Weed management strategy outlined in Biodiversity and Offset Management Plan (2013) and Annual Environmental Management Report 2013-2014 completed in May 2014.</p>
<p>EPL – L4.4, M5</p>	<p>Complaint Management</p>	<p>SLR recommends including weather parameters in the complaints register such as wind speed, direction and temperature inversion at the time of the event that was subject of the complaint. Weather conditions are currently documented in each individual Complaint Report but if added to the complaint register then this will assist in potentially identifying any trends in noise impacts that could be as a result of weather enhancing conditions.</p>	<p>Weather conditions to be included in Complaints Register from August 2014.</p>