

PINE DALE MINE
Independent Environmental Audit 2014
Status of Non-Compliances and Recommendations

TABLE 1: Summary of Non-compliances and Proposed Actions

Condition	Summary of Condition / Requirement	Auditors Comment	Compliance Status and Auditors Recommendation	Enhance Place Comment (status as at 17 March 2016)	Timing
PA 10_0041, Condition 3.27 (c)	<p>c) a Groundwater Management Plan, which includes:</p> <ul style="list-style-type: none"> i. groundwater assessment criteria, including trigger levels for investigating and potentially adverse groundwater impacts; ii. a program to monitor: <ul style="list-style-type: none"> i. groundwater inflows to the open cut mining operation ii. the impacts of the project on; <ul style="list-style-type: none"> - baseflows to Neubecks Creek; - any groundwater bores on privately owned land; and iii. a program to validate the groundwater model for the project, and calibrate it to site specific conditions; and iv. a plan to respond to any exceedances of the performance criteria, and offset the loss of any baseflow to Neubecks Creek caused by the project. 	<p>Pine Dale was assessed as non-compliant with this condition as groundwater monitoring results identified exceedances of trigger values as defined by the GWMP for pH and EC and the WMP has not been updated to reflect the current reporting criteria adopted (i.e. the previous version of the sites' Groundwater Monitoring Program (Dec 2005)).</p>	<p>Preparation – Compliant (2013)</p> <p>Implementation –</p> <p>Non-compliant</p> <p>Repeat Recommendation 2013/IEA/009</p> <p>Consult with NOW, OEH and DPE to review water quality trigger values and based on the consultation update and implement the WMP (incorporating the GWMP).</p>	<p>Unforeseen delays in the progress of the Pine Dale Mine Stage 2 Extension Project application has caused delays in the review and updates of existing management plans. Enhance Place has reviewed the relevant Environmental Management plans in light of the site being held in care and maintenance for an extended period.</p>	<p>Completed in September 2015</p>
PA 10_0041, Condition 3.52	<p>By the end of April 2011, the Proponent shall prepare and implement a Bushfire Management Plan for the site, to the satisfaction of the State Forest in consultation with the local Rural Fire Service.</p>	<p>The previous IEA (URS, 2013, p.A-18) identified that this condition was non-compliant on the basis that the Bushfire Management Plan was not approved by State Forests by the end of April 2011.</p> <p>The Bushfire Management Plan has not been developed to the satisfaction of State Forests and has not been updated to reflect the Site response for a care and maintenance situation, as opposed to a mining operation.</p>	<p>Non-compliant</p> <p>2014IEA/022 Recommendation</p> <p>Update the Bushfire Management Plan with respect to the Site being on care and maintenance. Ensure State Forests and the local RFS have involvement in the update of the Plan and confirm satisfaction of the plan from State Forests.</p>	<p>Noted, relevant environmental management plans reviewed in light of site being held in care and maintenance for an extended period.</p>	<p>Completed in September 2015</p>

Condition	Summary of Condition / Requirement	Auditors Comment	Compliance Status and Auditors Recommendation	Enhance Place Comment (status as at 17 March 2016)	Timing
PA 10_0041, Condition 5.1	Environmental Management Strategy Refer to Appendix A for full Condition requirements.	<i>Pine Dale has been found non-compliant with this Condition as a number of key revisions and updates have not occurred to the Environmental Management Strategy during the audit period.</i>	Preparation – Compliant (2013) Implementation – Non-compliant 2014/IEA/011 Recommendation <i>Update the Environmental Management Strategy and relevant figures and plans to reflect current monitoring programs and reports as well as explain and reflect that the Site has moved from operational activities to a care and maintenance status and that controls as detailed in the strategy and plans will remain relevant.</i>	Noted, relevant environmental management plans reviewed in light of site being held in care and maintenance for an extended period.	Completed in September 2015
PA 10_0041, Condition 5.4	Revision of Strategies, Plans and Programs Refer to Appendix A for full Condition requirements.	<i>This Condition was found non-compliant in accordance with Condition 5.4(c) as strategies, plans and programs were not updated following submission of the previous IEA (URS, 2013).</i>	Non-compliant 2014/IEA/012 Recommendation <i>Strategies, plans, and programs should be reviewed and revised to reflect recommendations provided in the previous Independent Environmental Audit report and to reflect the care and maintenance status of the Site.</i>	Noted, relevant environmental management plans reviewed in light of site being held in care and maintenance for an extended period.	Completed in September 2015
PA 10_0041, Condition 5.8	Independent Environmental Audit Refer to Appendix A for full Condition requirements.	<i>Pine Dale was found non-compliant with this Condition due to timing of the 2014 independent environmental audit as the audit was not commenced until August 2014 as compared to the condition requirement of June 2014.</i>	Non-compliant (due to timing)	Noted, no further action required.	Completed

Condition	Summary of Condition / Requirement	Auditors Comment	Compliance Status and Auditors Recommendation	Enhance Place Comment (status as at 17 March 2016)	Timing
ML 1569, Condition 2	Mining, Rehabilitation, Environmental Management Process (MREMP) - Mining Operations Plan (MOP) Refer to Appendix A for full Condition requirements.	Refer to ML 1664, Condition 3(a). This condition was found to be non-compliant given the MOP expired on 28 February 2014 whilst mining operations were continuing (the Site went into care and maintenance in April 2014) and the draft Care and Maintenance MOP was yet to be formally approved at the time of writing this report.	Refer to ML 1664, Condition 3(a). Non-compliant (due to expiration of previous MOP and no approval of draft C&M MOP) 2014/IEA/018 Recommendation Prepare and implement a plan identifying detailed rehabilitation measures for the entire length of Neubecks Creek.	A draft C&M MOP was submitted to DRE in March 2014. DRE responded in May 2014 seeking clarifications which rely on external advice. The required external expert assessment and advice has been received. Enhance Place has been actively working on the preparation of a robust rehabilitation strategy to meet DRE requirements. A revised C&M MOP has been submitted to DRE for approval and is available on the website. A rehabilitation program for Neubecks Creek has been included in the C&M MOP submitted to DRE.	C&M MOP Completed in December 2014
ML 1569, Condition 3(a)	Mining Operations Plan Mining operations must not be carried out otherwise than in accordance with a Mining Operations Plan (MOP) which has been approved by the Director-General.	This condition was found to be non-compliant given the MOP expired on 28 February 2014 whilst mining operations were continuing (the Site went into care and maintenance in April 2014). Pine Dale has been consulting with DTRIS-DRE concerning the requirements for the draft Care and Maintenance Mining Operations Plan / Rehabilitation Management Plan since April 2014 and was in the process of actioning DTRIS-DRE requests for the draft MOP at the time of the audit with a view to approval by the end of 2014. Therefore DTRIS-DRE are aware of the situation with respect to the status of the MOP.	Non-compliant (due to expiration of previous MOP and no approval of draft C&M MOP)	See above comment	Completed December 2014
ML 1569, Condition 3(e)	A MOP ceases to have effect 7 years after date of approval or other such period as identified by the Director-General.	This condition was found to be non-compliant given the 2011 MOP expired in February 2014 and a replacement MOP was in the process of being prepared but had not formally been approved.	Non-compliant	See above comment	Completed December 2014

TABLE 2: Summary of Auditor Recommendations and Proposed Actions

Condition	Auditors Recommendation	Enhance Place Comment (status as at 17 March 2016)	Timing
PA 10_0041, Condition 3.7	2014/IEA/008 Recommendation <i>The EPL should be changed to reflect the purchase of Centennial Coal residences and those residences that are no longer required on the licence.</i> Repeat Recommendations 2013/IEA/028 and 2013/IEA/029	Enhance Place acknowledges that there have been substantial changes to landownership adjacent to Pine Dale Mine and will consult with the EPA regarding what changes (if any) are required to EPL 4911.	EPL reviewed August 2014, no changes required.
PA 10_0041, Condition 3.26	2014/IEA/021 Recommendation <i>Prepare a formal report that analyses baseline monitoring data. The report to provide findings and recommendations concerning surface water flows/levels and quality in creeks and other waterbodies (including the Neubeck's Creek, the Blue Lake and the Cox's River).</i>	Surface water monitoring undertaken to date has not identified any adverse impacts to water flows/levels and quality in creeks and other water bodies. All monitoring requirements to meet this condition have been undertaken and further surface water assessments completed. Any further assessment would depend on the future of Pine Dale Mine and the recommencement of mining activities.	Prior to the recommencement of mining activities
PA 10_0041, Condition 3.39	2014/IEA/001 Recommendation <i>It is recommended that the workshop area be tidied and that redundant items be removed from Site. Localised oil spills should be cleaned up and waste material disposed of at an appropriately licenced facility. Equipment to remain on-site should be stored securely in the on-site containers.</i>	Noted. Site contractor notified of housekeeping matters and general tidy up required. Manager of Mining engineering will inspect on a weekly basis as part of statutory inspection procedure.	Clean up and removal of contaminated soil materials undertaken in June 2015.
PA 10_0041, Condition 3.51	2014/IEA/009 Recommendation <i>Review the suitability of the on-site fire truck and confirm if it is fit for purpose.</i> <i>It is recommended that Pine Dale invite NSW Rural Fire Services to inspect the Site and discuss fire management in the Blackmans Flat area.</i>	Noted, Enhance Place will liaise with the rural fire service regarding emergency response and preparedness in case of a fire.	Bush Fire Management Plan was updated in February 2015 (following review by the Rural Fire Service and Forestry Corporation of NSW). The on-site fire truck was removed from this plan.
PA 10_0041, Condition 5.2	Repeat Recommendation 2013/IEA/037 <i>The Bushfire Management Plan, Water Management Plan, Waste Management Plan and the Baseline Water Monitoring Plan should be updated to include a procedure for handling complaints and incidents as appropriate or reference other documents such as the Strategy where such processes are described.</i>	Noted, environmental Management Plans updated in light of Pine Dale Mine being put in care and maintenance.	Complete - Management Plans were updated in September 2015
PA 10_0041, Condition 5.6	Repeat Recommendation 2013/IEA/039 <i>Training on the use of the incident reporting systems for incidents, near misses and observations should be undertaken.</i>	Noted, Enhance Place will ensure all staff are adequately trained to report incidents following the recommencement of mining at the site. No further action required at this time.	Prior to the recommencement of mining activities.
PA 10_0041, Condition 5.7	2014/IEA/013 Recommendation <i>It is recommended that Pine Dale include an upload date next to each environmental monitoring document on the website so it is clear that they were uploaded within specified timeframe.</i>	All publically available reports including environmental monitoring data uploaded to the company website are tracked for auditing purposes using a 'digital change request form' confirmation of uploaded reports and the date is confirmed by the data team via email. This procedure is considered adequate to sufficiently demonstrate uploaded reports. No further action is proposed.	Complete

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PA 10_0041, Condition 5.9	2014/IEA/014 Recommendation <i>Ensure all recommendations provided in the audit report are included in the response to any recommendations</i>	Noted	Complete
EPL 4911, Condition L4.8	Repeat Recommendation 2013/IEA/041 <i>Identify in future noise reporting if modifying factors were / were not applicable (Clause 6.6 of AS 1055.1).</i>	Noted, noise reports updated accordingly.	Complete
EPL 4911, Condition O1.1	2014/IEA/001 Recommendation <i>Refer to PA 10_0041 Condition 3.39</i> Repeat Recommendation 2013/IEA/042 <i>Update the induction and bi-annual refresher training to include training of the storage, handling and disposal of materials and waste.</i>	Noted.	Prior to the recommencement of mining activities.
EPL 4911, Condition M1.2	Recommendation 2013/IEA044 <i>Update the Excel monitoring data record sheet for surface water, groundwater and noise to include a column to record who took the sample.</i>	Noted, database spreadsheets updated accordingly. No further action required.	Complete
EPL 4911, Condition M5.1	2014/IEA/015 Recommendation <i>Review complaints received from sources other than that the complaints records and ensure these are entered into the complaints register and that follow-up action is documented.</i> <i>Provide training on complaints procedures to ensure complaints are recorded and actioned.</i>	Noted, complaints database updated accordingly. No further action required.	Complete
EPL 4911, Condition M5.2	2014/IEA/016 Recommendation <i>Complaint records must be completed in their entirety. In particular corrective actions carried out and a root cause description to minimise further occurrences should be included.</i>	Enhance Place will review and update the complaints database and records to ensure adequately completed.	Complete
EPL 4911, Condition M6.2	2014/IEA/017 Recommendation <i>Consolidate the telephone complaints phone number into one number and change the descriptor on the website to 'environmental and complaints hotline'.</i>	Noted, Enhance Place will review the website and complaints line accordingly.	Complete
ML 1664, Condition 4(b)	2014/IEA/019 Recommendation <i>Ensure actions in the Action Plan provided by DTRIS-DRE dated 16 July 2014 are incorporated in the 2014 AEMR.</i>	Noted.	Complete
ML 1664, Condition 5	Repeat Recommendation 2013/IEA/047 <i>An incident management procedure should be developed for the site and all staff and contractors are inducted on their responsibility to report all observations, near misses and incidents.</i>	Noted, to be completed prior to the recommencement of mining activities.	Prior to the recommencement of mining activities.

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SoC, Condition 3.2	2014/IEA/023 Recommendation <i>Pine Dale should consider control and management of the number of Pine Trees on site.</i>	Noted, The revised Care and Maintenance Mining Operations Plan will include a discussion on the management and control of pine trees at Pine dale Mine.	Care & Maintenance MOP Completed, December 2014
SoC, Condition 11.4	2014/IEA/020 Recommendation <i>Grass soil stockpiles to minimise soil erosion.</i>	Noted, Enhance Place has revegetated more than 5 hectares of land with temporary grass seeding in 2014. A further review of the need to undertake additional temporary seeding of stockpile areas will be undertaken.	Complete