

# CULLEN VALLEY MINE

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## FIRE MANAGEMENT PLAN

*for Shoalhaven Coal Pty Ltd*

*20 April 2022*



## DOCUMENT CONTROL

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### Document Status

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# 1. INTRODUCTION

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## 1.1 Background

Cullen Valley Mine (CVM) is located near Cullen Bullen in the Western Coalfields of NSW, approximately 30 km north-west of Lithgow (see **Figure 1**). Underground mining commenced at CVM (formerly Tyldesley Colliery) around 1904 and continued up until the 1960s when the workings were abandoned. Early open cut operations were conducted on the site between 1948 and 1953.

The current development consent for CVM (DA 200-5-2003) was granted by the Department of Infrastructure and Planning (now the Department of Planning and Environment (DPE)) in August 2004 for a period of 21 years. The conditions of DA 200-5-2003 were subsequently modified in December 2004 to allow for the transportation of product coal from CVM to domestic destinations other than Mount Piper Power Station. The conceptual layout of the site as approved under DA 200-5-2003 is shown on **Figure 2**.

Mining of coal at CVM commenced in May 2000 using open cut methods following a four-month construction phase and continued until the site was placed in Care and Maintenance in early 2013.

Shoalhaven Coal Pty Ltd (trading as Castlereagh Coal Pty Ltd (Castlereagh Coal)) purchased CVM in May 2015 and has operated the mine under Care and Maintenance since that time. Castlereagh Coal intends to recommence open cut coal mining operations at CVM in early 2022 within the existing disturbance area approved under DA 200-5-2003. The operations are planned to recover approximately 450,000 tonnes of coal and to carry out associated rehabilitation activities, which are scheduled to be undertaken over a period of approximately 9 months. Coal produced from these operations will be transported by road to domestic destinations as currently approved.

## 1.2 Document Purpose and Scope

This Fire Management Plan (FMP) document has been prepared to describe the outline the response to, and management of fire within the CVM site. This revision of the FMP has been prepared in accordance with the requirements of DA 200-5-2003 for use by Castlereagh Coal during the recommencement of mining operations on site.

## 1.3 Document Objectives

The objectives of this document are to:

- Describe fire management procedures and response measures at CVM;
- Provide mitigation controls that will be implemented to reduce the risk and severity of fire events on site; and
- Outline procedures for communication with external CVM stakeholders in relation to fires.

Statutory requirements from DA 200-5-2003 that relate to this FMP and where they are addressed in this document are provided in **Table 1**.

## 1.4 Document Structure

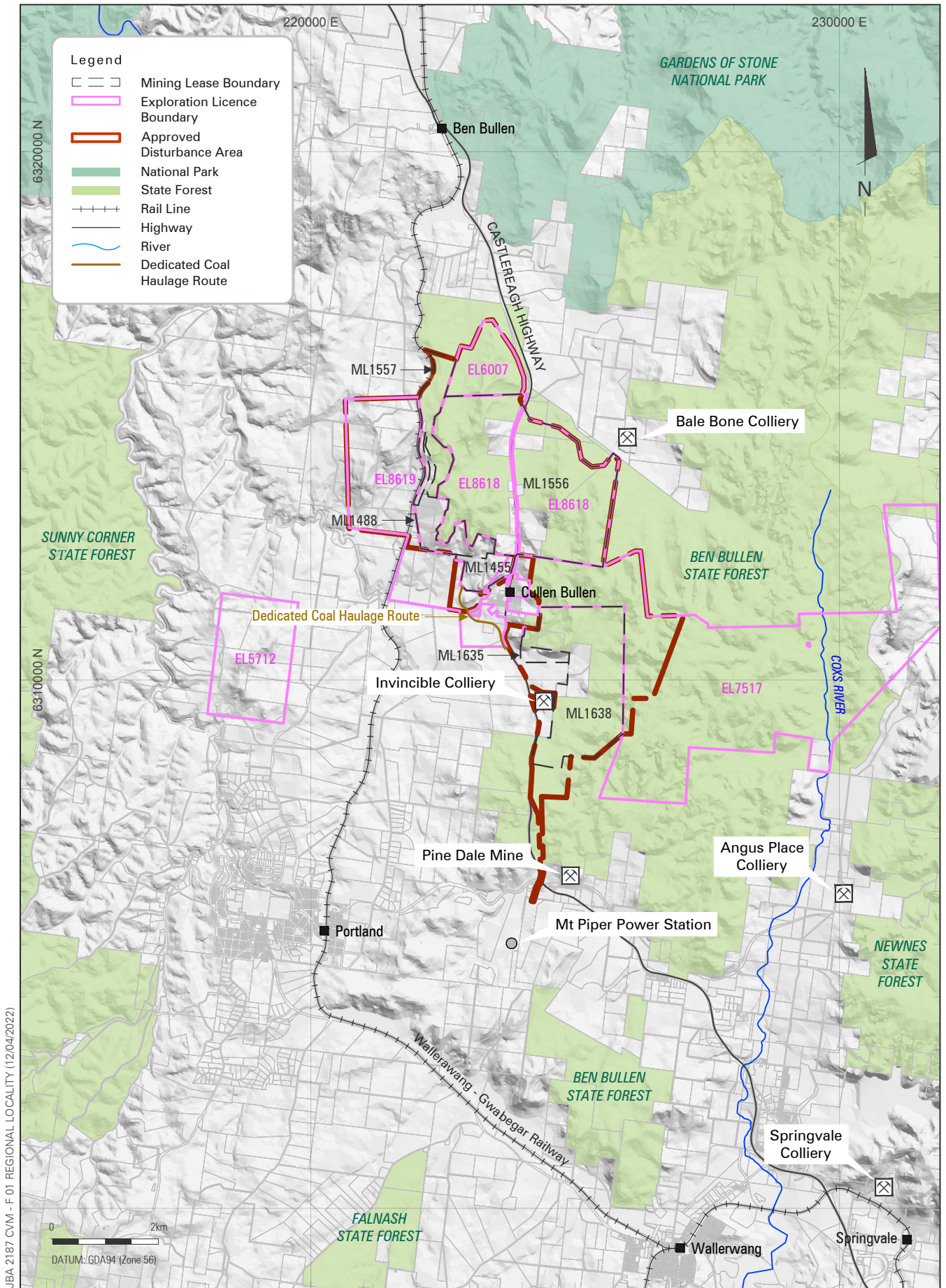
The document is structured as follows:

- **Section 1** outlines the purpose, scope and objectives of this FMP and provides relevant background information on CVM;

- **Section 2** outlines the management plan including mitigation measures, monitoring programs, air quality standards and land acquisition procedures;
- **Section 3** outlines the relevant stakeholder engagements as well as complaints, incidents and reporting requirements;
- **Section 4** provides an overview of the roles and responsibilities of personnel within the company in managing environmental issues for Cullen Valley Mine;
- **Section 5** outlines the reporting and review requirements for this FMP; and
- **Sections 6 and 7** provide a list of reference documents and abbreviations used in this document.

**Table 1 FMP Requirements**

DA 200-5-2003 Condition	Requirement	Where Addressed
Schedule 4, Condition 57	The Applicant shall: (a) ensure that the development is suitably equipped to respond to any fires on site to the satisfaction of DPI and the Rural Fire Service; and	<b>Section 2.3, 3</b>
	(b) prepare a Fire Management Plan; to the satisfaction of DPIE and the Rural Fire Service	<b>Section 3</b>



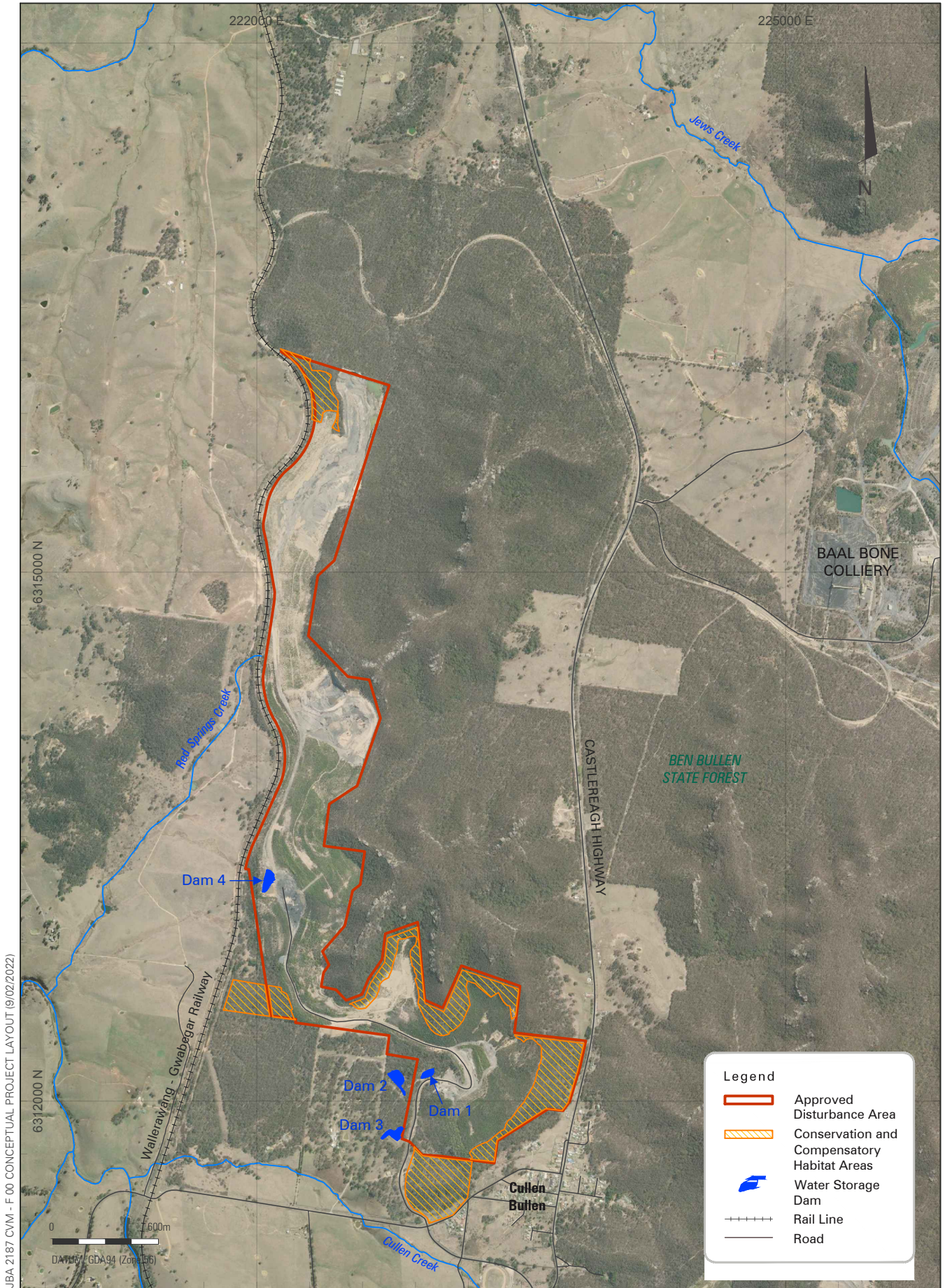
JBA 2187 CVM - F 01 REGIONAL LOCALITY (12/04/2022)

CULLEN VALLEY MINE



Regional Locality

**FIGURE 1**



CULLEN VALLEY MINE

Conceptual Project Layout

**FIGURE 2**

## 2. FIRE MANAGEMENT PLAN

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### 2.1 Existing Environment

This section provides a summary of the existing environment of CVM and the surrounding land categories that have been considered in this FMP. These include the CVM site and adjacent Habitat Compensation Areas (HCA), privately owned land, the Wallerawang-Gwabegar Rail Line and the Castlereagh Highway (refer to **Figure 2** and **Figure 3**).

#### 2.1.1 CVM Site

The existing CVM site generally consists of a combined open cut and highwall coal mining operation and associated infrastructure, rehabilitation areas and water management control structures. Coal is approved for extraction from the Upper Irondale, Irondale, Lidsdale and Lithgow seams of the Illawarra Coal Measures.

Open cut mining operations are currently undertaken on site utilising shovel/excavator and a fleet of trucks. Coal is extracted from seven seams within the Illawarra Coal Measures by the open cut operation. Highwall and underground mining operations are also approved under DA 200-5-2003 and include highwall mining and underground mining of the Irondale and Lithgow seams using continuous miner units. No highwall or underground mining is currently undertaken at CVM.

Site infrastructure generally includes the following:

- The CVM site offices, workshop, bathhouse and associated amenities;
- Fully bunded fuel storage facilities housing one 90,000 L tank and associated pipes, meters and pumps;
- Coal stockpiles with a capacity of 100,000 tonnes;
- Carpark and internal access roads (including a private haul road to the south of Cullen Bullen township), with site access from an intersection with Portland Cullen Bullen Road (see **Figure 1** and **Figure 2**); and
- Powerlines, transformer installations and other mining related facilities.

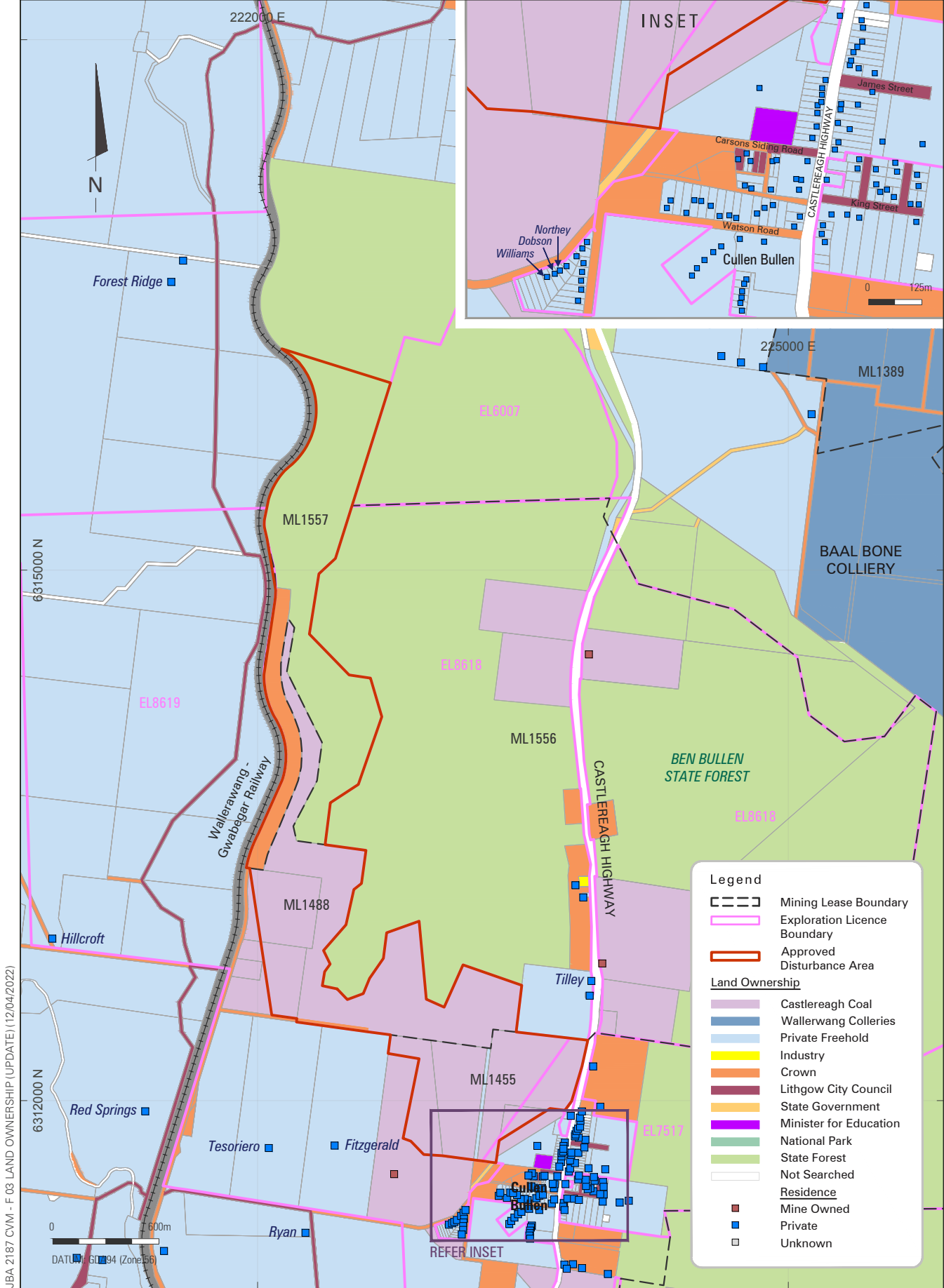
The land to be accessed for the open cut operation is predominantly covered by undulating native woodland and forests which comprise part of the Ben Bullen State Forest. While these native vegetation communities represent a stable and low maintenance landform, the vegetated areas surrounding CVM may represent a hazard during a fire event.

#### 2.1.2 Surrounding Private Land Ownership

The lands occupied by CVM are predominantly managed by Forests NSW as part of the Ben Bullen State Forest, with other areas within the site held by Castlereagh Coal and the Crown. A number of private landholdings are located in the immediate surrounds of the site. The status of land ownership surrounding CVM is shown in **Figure 3**.

The township of Cullen Bullen is located approximately 0.5 km to the south of the CVM site administration facilities and adjacent to the Castlereagh Highway (refer **Figure 1**). Cullen Bullen is surrounded by lands cleared for small rural properties and by the Ben Bullen State Forest.

A number of private rural properties are also located in the vicinity of the CVM, the locations of which are shown in **Figure 3**. Lands to the west have generally been cleared for existing agriculture including cattle grazing, while those properties immediately to the south and north of the site consist of small rural allotments.



JBA 2187 CVM - F 03 LAND OWNERSHIP (UPDATE) (12/04/2022)

CULLEN VALLEY MINE

Land Ownership

**FIGURE 3**



### 2.1.3 Wallerawang – Gwabegar Rail Line

The Wallerawang – Gwabegar Rail Line runs from south to north immediately adjacent to the western boundary of CVM, separating the site and the Ben Bullen State Forest from the cleared rural properties located along Red Springs Road. As shown on **Figure 2**, the location Wallerawang – Gwabegar Rail Line provides an effective potential fire break.

### 2.1.4 Castlereagh Highway

The Castlereagh Highway, a major regional road, provides a boundary to the east of the site, bordering the Ben Bullen State Forest to the east of the CVM site, as shown in **Figure 1**. The highway provides an effective access and potential firebreak between the site and further State Forest areas to the east.

### 2.1.5 Habitat Compensation Areas

The CVM HCAs as shown on **Figure 2** are approximately 50 ha in size and are predominantly native woodland areas owned by Castlereagh Coal. The HCAs have been permanently delineated as conservation areas under DA 200-5-2003. The HCA are located surrounding the areas previously disturbed by mining activities at CVM and adjacent to the Ben Bullen State Forest.

The aim of the HCAs is to provide a habitat for native wildlife, which gains much of its value in its location being continuous with the vegetation communities in the Ben Bullen State Forest. An important component of the habitat potential of the area relevant to fire management is fallen logs and leaf litter, which offer shelter for small ground dwelling mammals and reptiles.

### 2.1.6 Subsurface Heating

An area of underground heating was first encountered at CVM early in 2004 by the open cut operations of Lithgow Coal Company (previous owners of CVM). This fire had started in the abandoned Tyldesley Mine in the mid-1960s or 1970s and despite attempts to contain this event since, the fire is still being managed in consultation with the Department of Regional NSW-Resources Regulator (RR).

A Plan of Works for the management of the underground heating areas was updated by Umwelt (2020) and included in the CVM Mining Operations Plan 2021 - 2025. A further review relative to a Section 240 Notice requiring an updated Plan of Works for the containment and extinguishing of the subsurface heating has been commissioned, with the outcomes to be adopted into Rehabilitation Management Plan and related CVM documents.

Castlereagh Coal will continue to monitor for subsurface heating and undertake treatment measures in accordance with the updated Plan of Works. Monitoring and treatment activities for the subsurface heating area currently include:

- Weekly monitoring of heating areas (temperature/heat gun, sulphurous smell, smoke, discoloration of the ground, vegetation dieback or stress and/or surface cracking);
- Capping of surface cracking in heating areas; and
- Excavation and compaction of material as required to mitigate identified heating areas.

## 2.2 EMERGENCY CONTACTS

In all cases where there is a risk of loss of life, serious injury, or spread of fire onto adjoining properties, the RFS will be contacted immediately for assistance through the 000-emergency number. The RFS will also be contacted if there is a risk of fire impacting on infrastructure and other assets within CVM.

Forests NSW will also be contacted as soon as possible in the event that a fire is detected in the Ben Bullen State Forest, or if there is a risk of fire impacting their lands adjacent to the CVM site.

All personnel are responsible to notify the CVM Mine Manager and site office on the numbers provided in **Table 2** in the event of a fire occurring on site, or if there is the possibility that a fire in the region may reach the site.

All employees, contractors and visitors to the site are made aware of the appropriate emergency contacts and procedures to be used in the event of a fire during the site induction process.

## 2.3 MANAGEMENT STRATEGIES

This section provides a summary of the management strategies in place at CVM to minimise fire risk and manage any events that may occur.

### 2.3.1 CVM Site & Adjacent Properties

For the CVM site, the Wallerawang – Gwabegar Rail Line and surrounding road network provide effective fire breaks to assist in providing access for fire response and management. General measures implemented at CVM for the management of fire risk include:

- Regular inspections and maintenance of vegetation adjacent to site infrastructure, access roads and existing fire trails, as appropriate;
- Ensuring firefighting equipment is available on mobile equipment (including water carts) for the initial response to fire events on site, or to assist emergency services, if required;
- Ensuring all on site water storages are available for firefighting purposes to CVM personnel and the RFS, if required. The locations of current water management infrastructure on site are shown in **Figure 2**;
- All infrastructure areas, mobile and stationary plant and equipment at CVM having access to fire extinguishers;
- All infrastructure areas are regularly maintained to reduce the potential for fire occurrence or spread. Site equipment will be maintained in good working order to prevent incidents that could potentially result in a fire; and
- Ensuring that no additional impediment is caused by Castlereagh Coal to existing access tracks in the adjacent Ben Bullen State Forest which may be used for firefighting purposes by the RFS and Forests NSW.

### 2.3.2 Habitat Compensation Area

The HCAs pose a fire risk given the developed structure of the vegetation, leaf litter, fallen logs and continuity with the Ben Bullen State Forest. The structure of the vegetation within the HCAs provides the habitat values of these areas. As such, typical fire management strategies such as hazard reduction burning and fire break construction are not proposed for these areas due to their potential to greatly diminish their ecological significance.

The general fire management measures described in **Section 2.3.1** will be implemented for the areas of the HCA which share common boundaries with private properties and the mining and infrastructure areas of CVM.

**Table 2      Contact Details**

Emergency Contact	Contact Number
Emergency Services	000
Lithgow LGA Fire Control Centre	1300 258 737
Cullen Valley Mine Site Office	(02) 6359 0600
Cullen Valley Mine Manager	(02) 6359 0600
Forestry Corporation Head Office	(02) 9872 0111
Forestry Corporation Fire Duty Officer Northern Softwood Region, Bathurst Management Area	(02) 6332 4812

## 3. STAKEHOLDER ENGAGEMENT

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### 3.1 FMP Consultation

Correspondence with regulatory agencies relating to this revision of the FMP is included as **Appendix A**.

### 3.2 External Communications

#### 3.2.1 Community Complaints

All community complaints received by CVM are recorded in the Castlereagh Coal Complaints Register. The register is regularly maintained and published on the Castlereagh Coal website to document a summary of all complaints received and follow-up actions taken by CVM personnel in response.

Further detail on the management of community complaints is provided within Section 6.1.3 of the CVM EMS.

#### 3.2.2 Incidents and Non-Compliances

Schedule 6, Condition 5 of DA 200-5-2003 requires CVM to report any non-compliance against the requirements for this FMP (refer **Table 1**) to regulatory agencies and in the Annual Review.

Any reporting of a breach in compliance with the conditions of DA 200-5-2003 will outline the following:

- The date, time, and nature of the exceedance/incident; and
- The cause (or likely cause) of the exceedance/incident;
- Reference to the development consent condition which is considered to be non-compliant and the reasons for it;
- What action has been taken to date; and
- Describe the proposed measures to address the exceedance/incident and the proposed timeframe for completion.

Any incident will be reported to DPE and other relevant regulatory authorities immediately after becoming aware of the incident. Any non-compliance must be notified to DPE by the operator within seven days of becoming aware of the non-compliance. These notifications for incidents or non-compliances will be submitted in writing via the DPE's Major Projects Website and identify the development (including the development application number and name) and set out the location and nature of the incident, as outlined above.

## 4. ROLES AND RESPONSIBILITIES

**Table 4** summarises the management measures discussed in this FMP and provides the relevant responsibilities for each. These responsibilities may be delegated as required.

Ref	Control Measure	Responsibility	Timing
1	Review and approve this EMS and provide adequate resources for its implementation on site.	Operations Manager	Ongoing
2	All employees and contractors to be made aware of emergency procedures and responses in the case of fire at CVM.	All employees	Ongoing
3	Immediately enact the emergency notification procedure in the event of a fire on site ( <b>Section 2.2</b> of this FMP), notifying the site office and Mining Supervisor.	All employees	As required
4	Co-ordinate the immediate response to a fire on site and liaise with emergency services, as required.	Mining Supervisor	As required
5	All fire management equipment will be regularly maintained to ensure ongoing effectiveness.	Operations Manager	Ongoing
6	All onsite roads and water management infrastructure will be regularly maintained to provide access in the event of a fire.	Operations Manager	Ongoing
7	Monitor the areas impacted by subsurface heating in accordance with the CVM Plan of Management for Subsurface Heating.	Environment Officer	Ongoing
8	Notify the RFS if there are any changes to site access points at CVM.	Operations Manager	As required
9	Fire and subsurface heating management actions and any additional management measures will be reported in the CVM Annual Review.	Environment Officer	Annual
10	Complete review of this FMP to ensure consistency with current operations at CVM and industry standards and procedures.	Environment Officer	Five Yearly

## 5. REPORTING & REVIEW

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### 5.1 Reporting

#### 5.1.1 Annual Reporting

In accordance with Schedule 6, Condition 5 of DA 200-5-2003, CVM will continue to submit an Annual Review to DPE and relevant agencies. The Annual Review will include a summary of any changes to management or response arrangements for fire or subsurface heating on site during the year and detail any related incidents.

A copy of each CVM Annual Review is provided to DPE, RR, EPA, LCC and the representatives of the mine Community Consultative Committee (CCC).

#### 5.1.2 Stakeholder Reporting

In accordance with Schedule 6, Condition 8 of DA 200-5-2003 CVM is required to establish a CCC to oversee the environmental performance of the mine. While in operation, the CCC will meet at least twice a year and will review and provide advice on environmental performance including this document, monitoring results, audit reports or complaints.

### 5.2 Auditing

In accordance with Schedule 5, Condition 6 of DA 200-5-2003, Castlereaugh Coal will commission an Independent Environmental Audit within 2 years of the date of consent, and every five years thereafter, for submission to DPE, unless otherwise approved. This audit report will consider the effectiveness of the FMP and provide environmental management advice to ensure its ongoing effectiveness.

### 5.3 Review

This FMP will be reviewed on at least a five yearly basis to ensure that it remains consistent with operations at CVM and in accordance with general industry standards and procedures. Reviews will consider the need to modify the FMP and the management measures in place at CVM to ensure that all practicable measures are in place to minimise the risk of fire on site.

The FMP will also be reviewed (and if necessary, updated) in response to:

- Relevant findings from Independent Environmental Audits;
- Findings from investigations of community complaints or monitoring non-compliances relating to air quality impacts; and
- Directions from regulatory agencies.

Approval of any major amendments to this FMP will be sought from the Secretary of DPE and other stakeholders, as required under DA 200-5-2003.

## 6. REFERENCES

- Castlereagh Coal (2022) *Cullen Valley Mine Environmental Management Strategy*.
- Castlereagh Coal (2022) *Cullen Valley Mine Environmental Monitoring Program*.
- International Environmental Consultants (2003) *Cullen Valley Mine Lease Extension Project*.
- Umwelt (2020) *Care and Maintenance Mining Operations Plan (2021 – 2025) Cullen Valley Mine*.

## 7. ABBREVIATIONS

Abbreviation	Meaning
CCC	Community Consultative Committee
CVM	Cullen Valley Mine
DPE	Department of Planning and Environment
RR	Department of Regional NSW – Resources Regulator
EIS	Environmental Impact Statement
EMP	Environmental Monitoring Program
EPA	Environmental Protection Authority
FMP	Fire Management Plan
HCA	Habitat Compensation Areas
LCC	Lithgow City Council
RFS	Rural Fire Service
t	Tonnes

**APPENDIX A**  
**STAKEHOLDER ENGAGEMENT**

Cullen Valley Management Plans – April 2022 Department Review

Management/Monitoring Plans	Reviewed Y/N	Comments/Notes	Response
Environmental Monitoring Program	Y	<p>Questions marked in <u>underlined</u></p> <ul style="list-style-type: none"> <li>• A figure showing monitoring locations is provided. <u>The EMP needs to include a figure clearly showing sensitive receiver locations.</u></li> <li>• <u>The EMP needs to describe whether the air quality monitoring locations are representative of the operation.</u></li> <li>• A brief description of the monitoring of deposited dust and PM<sub>10</sub> is provided. <u>Further detail on the frequency of monitoring and processes to deal with exceedances should be provided.</u> Met Station is present.</li> <li>• Attended noise monitoring is undertaken quarterly. There is an exemption from the requirement to carry out continuous noise monitoring – letter attached as an Appendix to the Plan. <u>There is no/little discussion on exceedances and how that would be managed, maybe be discussed further in the other plans.</u></li> <li>• There is a commitment that blasting will not occur and if it were to occur a Blast MP would be submitted for approval prior to blasting occurring.</li> <li>• The EMP needs to describe how monitoring of coal tonnage, truck movements etc will be monitored.</li> <li>• Rehab monitoring undertaken monthly, no reference to MOP.</li> </ul>	<ul style="list-style-type: none"> <li>• Figure 4 land ownership has been included to illustrate the privately owned land surrounding CVM. It also includes labels for the land descriptors used within the noise criteria.</li> <li>• Section 2.2.1 of the EMP indicates that the monitoring locations are representative of the operations.</li> <li>• Air Quality monitoring frequency and process to deal with exceedances of criteria has been clarified within Section 2.2.1.</li> <li>• Noise monitoring process to deal with exceedances of criteria has been clarified within Section 2.3.3.</li> <li>• No Blast MP required as no blasting will occur in near future.</li> <li>• Section 2.9 has been included to describe the management of coal tonnages and haulage in accordance with the requirements of DA 200-5-2003.</li> <li>• Reference included within Section 2.7.3 to the MOP (soon to be Rehabilitation Management Plan).</li> <li>• Noted.</li> <li>• Referred to the 2021 IEA submitted to DPE in March 2022.</li> </ul>

		<ul style="list-style-type: none"> <li>• Consultation refers to the EMS,NMP,AQMP, WMP,CHVMP and FFMP.</li> <li>• Restates or refers to condition requirements for audits and complaints etc. Last audit was in 2016.</li> </ul>	
Noise Monitoring Program	N	<p>TO NOTE: The consent conditions have a letter as an appendix which has a series of commitments – many refer to particular plant to be used on-site to reduce noise emissions. <u>Please include these commitments.</u></p>	<p>CVM has been under Care and Maintenance since 2013. Accordingly, contractor equipment will be utilised for the recommencement of mining operations. Section 2.3.4 has been updated to include the methods to be implemented to manage noise emissions from the mining operations.</p>
Site Water Management Plan	N	<p>(a) Predicted site water usage is 10ML per annum for the proposed works and this would not be exceeded This is primarily used for dust suppression on haul roads. Water sourced from the underground workings and the pollution control dams.</p> <p>Questions:</p> <ul style="list-style-type: none"> <li>- Can't find any consultation with EPA and DPI Water. Please provide this.</li> <li>- for WAL27898, what is the available licence amount and from what water sharing plan is the water drawn?</li> <li>- How is clean water diverted around the extraction area and face? I couldn't find this detail in section 2.3.</li> </ul>	<ul style="list-style-type: none"> <li>- DA200-5-2003 does not require the EMP to be prepared in consultation with EPA or DPI Water. The EPA reviewed the site water management plan and provided comments in its letter correspondence dated 9 March 2022.</li> <li>- WAL27898 is for a total of 80 units. Section 2.3 of the Site Water Management Plan has been updated to reference the details of this WAL and WSP which it is drawn from.</li> <li>- Section 2.3 has been updated to include a reference to the diversion drains/contour banks which are installed upstream of disturbed areas to divert water around mining operations where this is practically possible</li> </ul>

		<ul style="list-style-type: none"> <li>- 2.2.3 – stronger commitment to maintain freeboard to ensure the required rainfall events are captured.</li> </ul>	<ul style="list-style-type: none"> <li>- Section 2.3.2 has been revised and updated to strengthen commitment to maintain adequate freeboard in accordance with Blue Book requirements.</li> </ul>
Surface Water Monitoring Program	N	<p>Question</p> <ul style="list-style-type: none"> <li>- Section 3 – there are no procedures or commitments to undertake corrective actions or mitigation measures if the surface water criteria is exceeded. You must include these.</li> </ul>	Sections 3.15 and 3.16 have been included to provide a mechanism for investigation and/or corrective action in the event the surface water criteria/trigger level is exceeded.
Fire Management Plan	Yes	<p>Notes.</p> <p>The Plan could expand more on how it's suitably equipped to deal with fires, however, RFS is satisfied with Plan.</p> <p>Combustion issue is discussed – is being managed with RR.</p>	Noted.