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ENVIRONMENTAL ASSESSMENT OF THE COMBINED PASMINGO COCKLE CREEK SMELTER PTY LTD AND INCITEC FERTILISER PTY LTD REMEDIATION PROJECT

S75W Application for an increase in the volume and height of the
onsite Containment Cell

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Environmental Assessment of the Combined Pasminco Cockle Creek Smelter Pty Ltd and Incitec Fertiliser Pty Ltd Remediation Project

S75W Application for an increase in the volume and height of the onsite
Containment Cell

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Ferrier Hodgson

Level 29, 600 Bourke Street, Melbourne VIC 3000

Consultant

Cara Renshaw

Tel: (02) 8907 0900

Registered Address

Level 1, 41 McLaren Street, North Sydney 2025

WSP Contacts

Cara Renshaw; Richard Johnson

Table of Contents

Executive Summary.....	5
1. Project Background.....	7
1.1. Overview of Historical Operations on the Site.....	7
1.2. Description of the Existing Approved Project.....	7
1.3. Details of the Combined Remediation Project	8
1.4. Justification for this modification	9
1.5. Applicable Management Plans and Monitoring Programs	10
2. Assessment of Environmental Impacts	11
2.1. Qualitative Risk Assessment	11
2.2. Visual Assessment of the PCCS Cell	12
3. Consultation	13
3.1. NSW EPA	13
3.2. Lake Macquarie City Council	13
3.3. Site Auditor	13
3.4. Mine Subsidence Board.....	13
4. Conclusions.....	14
Figures.....	15
Appendices.....	18

Executive Summary

Pasminco Cockle Creek Smelter Pty Ltd (Subject to Deed of Company Arrangement – (PCCS)) has previously received approval under Part 3A of the EP&A Act 1979 (the Act) to remediate its contaminated site at Boolaroo, near Newcastle, NSW, Australia.

By an approval under s.75W of the EP&A Act dated 17 December 2012 (MOD 4), contaminated material from the adjoining site owned by Incitec Fertilisers Pty Ltd (IFL) was authorised to be placed in the containment cell under construction on the PCCS site.

Since approval of MOD 4, excavation of the contaminated material from the IFL Site and its placement in the containment cell on the PCCS Site has been ongoing. As a consequence of MOD 4, PCCS is currently authorised to place approximately 1,650,000 m³ of contaminated material into the PCCS containment cell, which is to be a maximum height of 38 m RL.

Recent detailed surveys of the PCCS and IFL sites have revealed that additional cell capacity of approximately 250,000 m³ is required to adequately cater for all contaminated material from the PCCS and IFL sites. This environmental assessment (EA) is lodged in support of an application under s.75W of the EP&A Act for an increase in the volume and height of the cell to make provision for this material.

In essence, the only material factors to be considered in the EA are:

- The visual environment will change by virtue of the increased height of the PCCS cell. The visual assessment of the new project concludes that the increased height of the PCCS cell will not be material from any relevant viewing point.
- There will be environmental, social and economic benefits arising from the placement of all relevant contaminated material on the PCCS and IFL sites into the PCCS cell. No alternative arrangements are in place for the removal of the contaminated material which exceeds 1,650,000m³ to any off site location.
- As for the existing projects, the construction environmental impacts will be appropriately managed in accordance with existing approvals.
- The amended cell design will still accommodate recreational use of the top of the cell for the general community.

Overall, it is reasonable to conclude that any adverse impact arising from the placement of additional contaminated material into the PCCS containment cell have been considered, as the development is materially the same development as originally approved and that the associated environmental impacts are negligible.

GLOSSARY

TEXT	MEANING
EA	Environmental Assessment
EP&A Act 1979	Environment Protection and Assessment Act 1979
ETP	Effluent Treatment Plant
Combined Remediation Project	The merging of the PCCS and IFL remediation projects by the placement of the IFL contamination in the PCCS containment cell
Combined Site	The area consisting the PCCS and IFL Sites
CWMP	Contaminated Water Management Plan
Deed Administrators	Ferrier Hodgson
DoPI	NSW Department of Planning and Infrastructure
EPA	NSW Environment Protection Agency (formerly DECCW)
EPL	Environmental Protection Licence
FH	Ferrier Hodgson (Deed Administrators)
IFL	Incitec Fertiliser Pty Ltd
LMCC	Lake Macquarie City Council
MSB	Mine Subsidence Board
PCCS	Pasminco Cockle Creek Smelter Pty Ltd (Subject to Deed of Company Arrangement))
RO	Remediation Order
s.75W	Section 75W of the repealed Part 3A of the EP&A Act 1979 setting out procedures for modifications to an approved project
SWMP	Surface Water Monitoring Plan
VMP	Voluntary Management Plan
WTP	Wastewater Treatment Plant

1. Project Background

The remediation of the PCCS site described as 13a Main Road, Boolaroo, near Newcastle, NSW, Australia is the subject of Major Projects Approval 06_0184 (as modified including most recently by MOD 4). MOD 4 permitted remediation of contaminated material from the IFL Site through emplacement in the PCCS containment cell constructed in accordance with the PCCS Part 3A Approval

The remediation of the adjoining IFL site described as Lot 1 DP225720 13 Main Road, Boolaroo, near Newcastle, NSW, Australia is the subject of Major Projects Approval 08-0221 (IFL Part 3A Approval). By instrument dated 17 December 2012, the IFL Part 3A Approval was modified to permit contaminated material excavated from the IFL Site to be placed in the containment cell on the PCCS Site.

Although Part 3A of the EP&A Act has now been repealed, Schedule 6A of the Act continues to apply to Part 3A transitional projects – including the remediation of the PCCS Site and the adjoining IFL site.

Remediation of the PCCS Site and the IFL Site in accordance with the PCCS Part 3A Approval and of the IFL Site in accordance with the IFL Part 3A Approval including excavation of contaminated soil and its placement in the PCCS containment cell is well advanced and is due for completion, subject to weather, in late 2013.

Documents lodged in support of PCCS MOD 4 and IFL MOD 1 contemplates that the PCCS containment cell would, when complete, have a maximum volume of 1,650,000 m³ and a maximum height of RL38 m.

Recent surveys of the PCCS Site and the IFL Site, and in particular, of the estimated remaining contaminated material which is yet to be excavated and placed into the PCCS cell, will cause the cell to have a volume in excess of 1,650,000m³ and a maximum height in excess of RL38 m. Having regard to the surveyed estimated quantity of contaminated material which is yet to be excavated, modification of the PCCS Part 3A Approval is now sought to allow a maximum volume of 1,900,00 m³ and a maximum height of RL42.15 m. This increased volume and height allows for the placement of approximately 140,000 m³ of contaminated material in addition to the already approved 1,650,000 m³ and also provides for a contingency of 110,000 m³.

This modification application does not seek approval for the excavation of any additional contaminated material. All proposed excavation will occur in accordance with the existing PCCS Part 3A Approval and IFL Part 3A Approval.

This document is the Environmental Assessment (EA) in respect of the proposed increase in contaminated material to be placed within the PCCS cell.

1.1. Overview of Historical Operations on the Site

Conventional lead smelting operations on the PCCS Lands (including the IFL site at that time) commenced in 1896. Various technology upgrades occurred on the site over the course of the site's operations until the smelter closure in September 2003.

In the second part of the 1900s, the Incitec Site was subdivided from the then existing PCCS Site for the purposes of fertiliser production by a company separate to PCCS. The IFL site is almost completely surrounded by the PCCS Site. IFL has owned the IFL Site since 2003 but ceased operations in 2009. Prior to that date, IFL used the IFL Site for fertiliser production, storage and distribution.

During the years of operation on the PCCS and IFL sites, both sites became contaminated by slag (used for filling and levelling parts of the site) and other raw materials and products of the industrial activities.

A Remediation Order (RO) was issued to PCCS on the 1st of July 2003 by the Environment Protection Authority (EPA). Part of the PCCS site has been remediated to a stage where it has been excised from the RO. The mechanism for this excision will apply in principle to the balance of the PCCS Site over time.

The IFL Site was declared a remediation site under s.21 of the *Contaminated Land Management Act 1997* in 2005. IFL committed to a Voluntary Management Plan (VMP) (last modification dated 9 February 2010).

1.2. Description of the Existing Approved Project

The remediation of the PCCS Site was initially described in the 2006 EA as including the excavation of contaminated soil with subsequent refilling, regrading and surface stabilisation with imported fill as necessary, treatment of excavated materials as required, emplacement of excavated material and other materials into a containment cell which will be progressively sealed by capping imported from off-site, and the provision of appropriate environmental controls. Prior to the approval, there was a phase of removing for sale or reuse as much of the materials on the PCCS Site as possible. The approval also included demolition and removal of the smelter machinery, equipment and buildings (including asbestos).

The PCCS project was approved on 24 February 2007 and allowed for staging of the project including undertaking the remediation and cell construction in defined stages. There were initially five (5) remediation parcels with the later addition of a small parcel for conservation purposes known as the Angophora Reserve. The IFL site has subsequently been included as Parcel 6 (refer **Figure 1.1**)

Activities such as lead recovery from on-site slag by operation of a jig machine, treatment of 'special' wastes for approved off-site disposal and the off-site Lead Abatement Strategy are either complete or nearing completion.

The PCCS remediation project is very advanced. Parcels 1 to 3 and the Angophora Reserve are essentially complete with Remediation Parcel 4 nearly complete and Remediation Parcel 5 substantially commenced.

The PCCS Part 3A Approval was supplemented on 9 April 2008 with the approval of the detailed Containment Cell Design. A s.75W modification was approved on 24 June 2010 in relation to some minor matters relating to the qualifications of who can sign off the completed cell.

The cell design was also modified to increase the footprint and volume in May 2010 but within the parameters of the then existing approvals.

A s.75W project approval modification was subsequently granted on 10 August 2012 which provides for a change to the cell cap to allow a membrane layer as a replacement of the originally approved clay layer due to shortages in clay availability. The modification approval calls for a Cap Report to be signed off by the PCCS Site Auditor.

Prior to the addition of the IFL remediation and the approval of MOD 4, the PCCS project was scheduled to have been completed by about mid 2013. Remediation works are now scheduled to be completed by the end of 2013.

1.2.1. IFL Project

The IFL project was approved in two stages. The IFL Stage 1 Approval was granted on 17 August 2009 (Project Approval MP 08_0221) and authorised immediate early works to undertake groundwater control on the northern portion of the IFL site accompanied with the approval to demolish a gantry running parallel to the northern boundary with the PCCS site. The IFL Stage 1 approval was subsequently modified in 2010 to include groundwater controls on the southern portion of the IFL site.

Both parts of Stage 1 were installed and operating at some stages to certain degrees, although due to other on-site activities have ceased to be practically effective.

The IFL Stage 2 approval was received on 11 November 2010 and included the following activities:

(a) Demolition/removal of the machinery, equipment and buildings (including asbestos), the construction of water management facilities (e.g. dams, drainage, and a Water Treatment Plant (WTP)) - all complete to the required remediation staging.

(b) Excavation of contaminated soil for placement in an on-site containment cell – virtually no progress achieved to date. This component of the project was scheduled under the latest IFL VMP to be complete before the end of 2014.

The IFL Remediation Project has achieved demolition, asbestos removal and the installation of a WTP and associated dams. Soil remediation has commenced and is also scheduled for completion by the end of 2013.

By instrument dated 17 December 2012, the IFL Part 3A Approval (Project Approval MP 08_0221) was modified to permit contaminated material excavated from the IFL Site to be placed in the containment cell on the PCCS Site. **Figure 1.2** shows the combined project.

1.3. Details of the Combined Remediation Project

1.3.1. Modified Containment Cell Description

This modification application seeks approval to place additional contaminated material into the PCCS containment cell, the additional material is qualitatively the same as all other material which has already been excavated from the PCCS and IFL sites and which has been placed into the PCCS cell. The source of the contaminated material remains either the PCCS Site or the IFL Site.

The PCCS cell would retain the same footprint and design, but would be less than 5 m higher (an increase from 38.0m to 42.15m RL) with a decreased top surface area. Details of the modified design are provided in the report of Golder Associates which is attached as **Appendix A**.

The top surface of the PCCS cell would remain relatively flat (2% slope – as approved by the August 2012 s.75W modification), self-draining and suitable for some recreational activity with grass on the top surface and grass or other stabilising vegetation on the batters. Despite the increase in the cell volume, the amount of leachate generated from the cell would be the same as for the existing cell so that the current leachate treatment capacity would not need to be changed.

The visual impact of the increased height is assessed in **Section 2.2** of this document.

After the remediation is complete, the PCCS cell would be managed in accordance with condition 8.8 of the PCCS Part 3A Approval (Project Approval 06_0184) which would continue to apply to the modified cell. It is anticipated that the remediated PCCS Site and IFL site would then be developed in accordance with the master plan redevelopment of the PCCS/IFL site that has been the subject of Lake Macquarie Council assessment for the past few years.

It is also anticipated that the remediation order issued in respect of the PCCS Site would be modified at a suitable time after the remediation is complete to restrict its application to the cell and its immediate surrounds. It is envisaged at a later stage after the cell has been demonstrated to be stable in form and in management that the RO would be lifted altogether (subject to agreement with the EPA).

It is anticipated that the VMP applying to the IFL site would also be lifted at a suitable time after completion of remediation (subject to agreement with the EPA).

1.3.2. Modified Remediation Staging and Management

Remediation Staging

Staging of the completion of the remediation project will not be affected by the proposed modification, the excavation of contaminated material and its placement in the PCCS cell will continue as previously approved. It is anticipated that subject to weather, and approval of the subject modification application, that the remediation of the PCCS Site and the IFL Site in accordance with the PCCS Part 3A Approval and the IFL Part 3A Approval would be completed by the end of 2013. Capping of the containment cell would then proceed in accordance with the PCCS Part 3A Approval. After remediation is complete on the IFL Site, it would be graded and stabilised for erosion control. As before, when the whole site has been remediated (except for the PCCS ETP), the ETP would then be dismantled and the area remediated leading to the closure of the PCCS cell and finalisation of the cell capping.

Environmental Management

All existing environmental controls in the PCCS Part 3A Approval and the IFL Part 3A Approval would remain in place for the duration of the works identified in this modification.

In addition, Environment Protection Licence No 5042 (EPL 5042), issued to PCCS and which applies to the PCCS Site and the IFL Site would remain in place. That EPA imposes a comprehensive range of environmental management and monitoring requirements across the whole of the PCCS Site and the IFL Site

It is expected that the RO applying to the PCCS Site would remain in place and the VMP applying to the IFL Site would also remain in place during the completion of the excavation of relevant contaminated material and its placement in the PCCS containment cell.

1.4. Justification for this modification

A detailed survey of the containment cell was completed in October 2013 and PCCS now have clarity on the remaining amount of material requiring placement within the cell to complete the remediation program.

Despite using information from bore holes and previous technical studies, the specific depth of contamination on the site has been unknown until now when remediation is almost complete. Additional material which hadn't previously been identified has been discovered during the course of the remediation works, primarily due to contaminants leaching through the soil that require tracing, and hot spots being located. The additional material is principally related to the PCCS site, not the IFL site.

PCCS are confident that the remediation has been completed thoroughly and that it will be completed in accordance with the pre-approved levels. The requested volume increase includes a sufficient contingency volume to avoid the need to repeat the s.75W process should additional hot spots be located during the remaining remediation.

1.5. Applicable Management Plans and Monitoring Programs

This section provides a summary of the management plans and monitoring programs relating to the approved project and a description of the proposed changes to these plans/programs to accommodate the modification).

1.5.1. Remediation Period

Section 5 of the PCCS Part 3A approval sets out the “Environmental Monitoring and Auditing” conditions for the remediation period. The Section 5 conditions are further qualified by Section 7 Remediation Environmental Management.

Remediation Environmental Management Plan

The existing Remediation Environmental Management Plan would still be applicable and does not require revision as a result of this modification.

Air Quality and Meteorological Monitoring

The existing Air Quality Monitoring Plan would still be applicable and does not require revision as a result of this modification.

Surface Water and Groundwater Monitoring

The existing PCCS CWMP and SWMP would still be applicable. Similarly, the existing Interim Groundwater Management Plan (IGMP) would still apply.

Noise Monitoring and Assessment

The existing Noise Monitoring Plan would still be applicable and does not require revision as a result of this modification.

Traffic and Transport Management Protocol

The existing Traffic and Transport Management Protocol would still be applicable and does not require revision as a result of this modification.

Environmental Auditing

The PCCS Part 3A approval condition 5.11 requires an Independent Environmental Audit Report (IEAR) be prepared every 12 months assessing environmental compliance, performance and effectiveness against the PCCS approval. A similar condition is included in the IFL Stage 2 Approval. It is proposed that the next PCCS IEAR be conducted over the whole site and respond to the conditions that result for the total site.

Validation of Remedial Works

By agreement, the IFL Site Auditor Andrew Lau of JBS has passed over the audit role for the Combined Remediation Project to Graeme Nyland of Environ, the PCCS Site Auditor. The same procedures and approvals that have been applied to the PCCS remediation will be applied to the additional IFL area.

1.5.2. Operation Period

Environmental Management of the Containment Cell

Condition 8.6 of the PCCS Part 3A approval would continue to apply to the completed PCCS containment cell. A preliminary Containment Cell Environmental Management Plan (CCEMP) was provided with the original approved PCCS Cell Design.

2. Assessment of Environmental Impacts

Set out below is an environmental assessment of the proposed modified containment cell.

2.1. Qualitative Risk Assessment

A qualitative risk assessment of the potential environmental impacts of the additional containment cell volume sought by the subject s.75W application is set out below

As this modification application does not seek approval for the excavation of any additional contaminated material beyond that which is already approved by the PCCS Part 3A Approval and the IFL Part 3A Approval, All proposed excavation will occur in accordance with the existing PCCS Part 3A Approval and IFL Part 3A Approval. It follows that the only additional works which would be undertaken in the event that the subject s.75W application is approved, would be the those additional earthworks required to place excavated material into the containment cell.

Potential risk	Assessment
Contamination materials affecting humans by ingestion or exposure	Contaminants presenting a greater risk such as asbestos, PCBs and concentrated metals have already been removed from both sites using approved and safe procedures. Procedures exist within the approved remediation activities to deal with previously undiscovered finds of similar materials during the remediation period. Remediation crews are subject to regular lead-in-blood testing and response procedures to ensure that there is no adverse accumulation of lead arising from the remediation. This potential impact does not require further assessment.
Dust generated by materials movements affecting the environment	Dust will arise from the operation of equipment and trucks when the excavated material is placed into the containment cell. This risk will be managed in accordance with existing PCCS Management Plans, the existing requirements of the PCCS Part 3A Approval and EPL5042.
Noise generated by equipment when placing excavated material into the containment cell	Some minor additional noise will occur from the operation of equipment and trucks involved in the placement of excavated material into the containment cell. This risk will be managed in accordance with existing PCCS Management Plans, the existing requirements of the PCCS Part 3A Approval and EPL5042. The period during which works associated with the placement of excavated material into the containment cell will be undertaken, will not be any longer than the period of works contemplated by MOD 4. In addition, the nature of the works to be undertaken in accordance with any approval issued in respect of this application is the same as those works which are presently contemplated by the PCCS Part 3A Approval and the IFL Part 3A Approval. Accordingly, no material increase in noise from equipment used when placing excavated material into the containment cell is predicted.
Impacts of remediation activities on transport and traffic	Onsite traffic will be unchanged. The only additional traffic or equipment movement will be involved in the placement of excavated material into the PCCS cell. This potential impact does not require further assessment.

Impacts of remediation activities on surface or groundwater (including erosion)	The placement of additional excavated material into the containment cell will not materially alter any surface or groundwater conditions beyond those which result from existing and approved activities. The size of the footprint of the cell will not alter.
Social and economic impacts associated with the remediation	The timely completion of the remediation of the PCCS Site and the IFL Site will be beneficial by limiting the time that the site remains contaminated and with exposed surfaces. The visual environment will be altered to a minor extent by the increased height of the PCCS cell, however, as discussed in the attached Conybeare Morrison report, the impact of the increased height is considered reasonable
Potential impacts on and from mine subsidence	The existing PCCS cell has been designed to meet the Mine Subsidence Board requirements. The modified cell will not alter this completed task, although it is proposed that the Mine Subsidence Board will be notified of the expanded cell design.

2.2. Visual Assessment of the PCCS Cell

A Visual Assessment Report for the enlarged PCCS cell is attached at **Appendix B**. The report includes an assessment of the visual impacts at RL42.15.

The report makes the following conclusions:

While acknowledging that the PCCS cell will result in a major change to the topography of the PCCS/IFL sites, the visual impact of the cell increasing by less than 5m in height, will be relatively insignificant due to the mitigation measures outlined of battering and landscaping of the cell.

As discussed in Section 5.3 of the Visual Assessment, Views of the cell from long and medium distance views illustrate the cell blending into the backdrop of surrounding hills, with increase in height visually unperceivable over time when the landscape is established. Intermediate views of the cell from within the site of its increase in height are of low visual impact.

In summary, the visual environment will be altered by a minor increase in the height of the PCCS cell, but that increase will not be material.

3. Consultation

3.1. NSW EPA

Duncan McGregor of Minter Ellison has, on behalf of the Deed Administrators, advised John Coffey of the EPA in relation to the scope of the proposed s.75W modification.

John Coffey raised no material issues in relation to the proposed modification. In addition, John Coffey indicated his view that the proposed modification would not require any variation to EPL5042.

Duncan McGregor indicated that a copy of the s.75W modification would be provided to John Coffey at the time of lodgement of the application with the Department of Planning and Infrastructure.

3.2. Lake Macquarie City Council

Sharon Pope of Lake Macquarie City Council (LMCC) has been consulted by Ferrier Hodgson. Ferrier Hodgson reports that LMCC are supportive of the works to be undertaken and are happy to be consulted during the assessment of the application. LMCC expressed their interest in seeing how the cell would blend with Munibung Hills, and requested a copy of the visual assessment.

A copy of this EA, including the visual assessment has been provided to Council concurrently with this s.75W modification.

3.3. Site Auditor

The Deed Administrators have consulted with the PCCS Site Auditor (Graeme Nyland of Environ) seeking any comments in relation to the proposed increase in the volume of the existing cell. Mr Nyland has prepared a response advising that he is satisfied that the remediation has been conducted to the agreed standard, and has no concerns over the validation results obtained. The Auditor is aware of a number of areas of unexpected depths of contamination, and notes that an increase such as this is not unusual, particularly given the size of the site.

A copy of the Auditor's letter is contained in **Appendix C**.

3.4. Mine Subsidence Board

WSP consulted with the Mine Subsidence Board (MSB) on 22 October 2013. The MSB advised that the modification will need to readress the mine subsidence design implications.

Golder Associates have prepared a letter for the MSB detailing that the design calculations indicate that the conceptual expansion design will not be damaged by mine subsidence. A copy of Golder's letter is contained in **Appendix D**.

A copy of this EA, and Golder Associates cell expansion drawings have been provided to the MSB concurrently with this s.75W modification.

4. Conclusions

Summary of the Environmental Impacts for the Combined Project

There are no material increases in adverse impacts of the minor increase in the volume and height of the existing PCCS containment cell on the surrounding locale.

The increase in volume and height of the existing PCCS containment cell will facilitate the completion of the major remediation project comprising the remediation of the PCCS Site and the IFL Site by way of excavation of contaminated material and its placement in the existing PCCS containment cell. The relatively minor increase in the height of the existing approved containment cell is unlikely to be discernible to most viewers in the locality, and should be balanced against the positive environmental outcomes achieved by facilitating the timely completion of the remediation of two large and extensively contaminated sites.

Approval of the s.75W application would avoid any requirement to:

- move up to 250,000m³ of excavated material from the PCCS Site and the IFL Site to an as yet unidentified off-site location with appropriate capacity and containment safeguards or
- to place that excavated material in a new dedicated facility with appropriate safeguards elsewhere on either the PCCS Site or the IFL Site.

Both of these alternative solutions are likely to have material environmental impacts

It is reasonable to conclude that any adverse impact of the cell expansion can be considered to be a minor impact in respect of the assessment that the Minister for Planning needs to consider when assessing the s.75W requesting modification to the existing PCCS Part 3A approval, as the development is materially the same development as originally approved and that the associated environmental impacts are negligible.

Figures

Figure 1.1 – Project Remediation Parcels

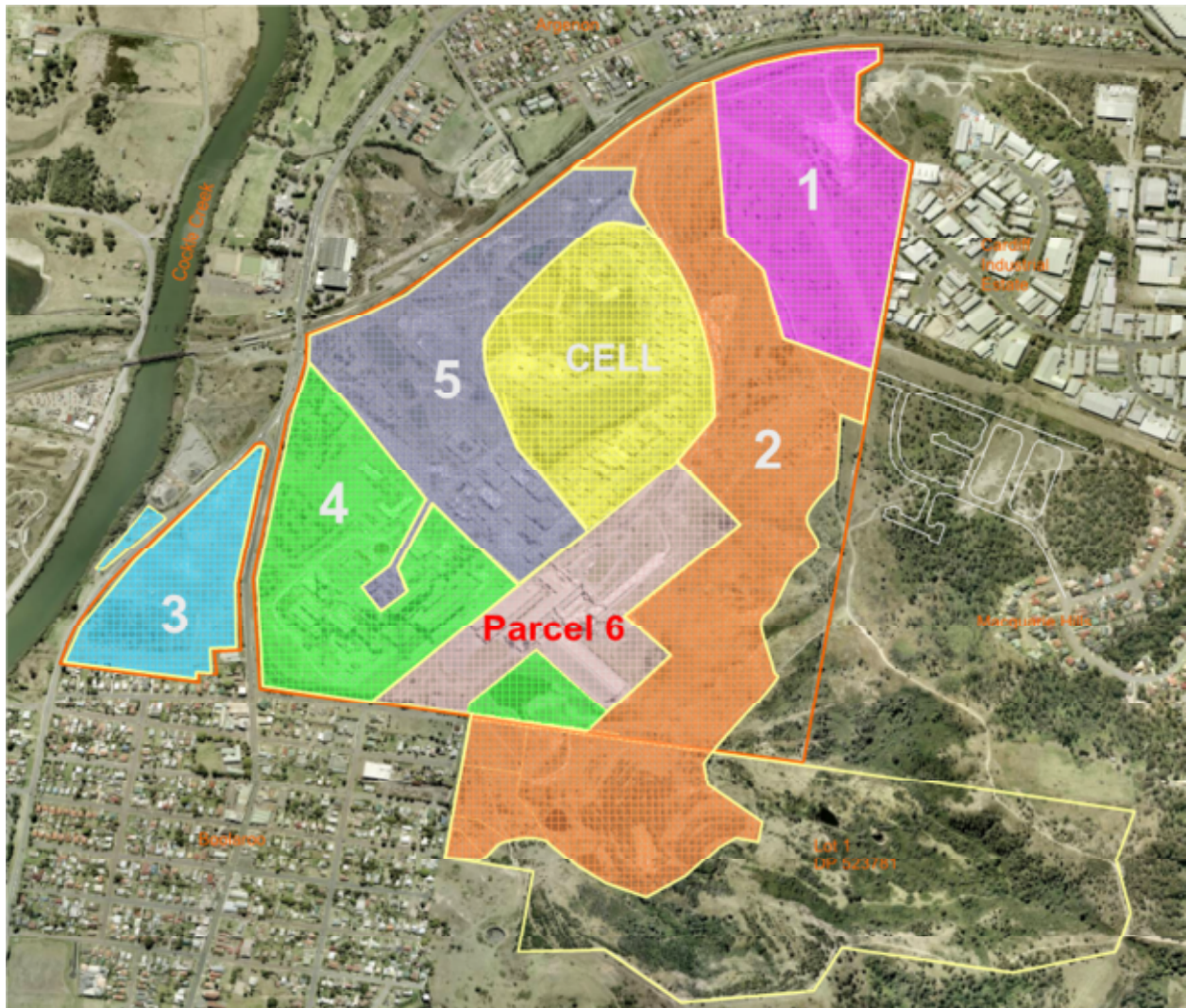


Figure 1.2 – Aerial Photo of Combined Project Cell



Appendices

APPENDIX A

Expansion of PCCS Containment Cell Concept Design Report – 21 October 2013 – Golder Associates

APPENDIX B

Visual Assessment of Proposed Expansion of Containment Cell – October 2013 – Conybeare Morrison

APPENDIX C

Letter from the Site Auditor

APPENDIX D

Golder Associates Letter to Mine Subsidence Board