



Broken Hill Operations Pty Ltd - Rasp Mine 2022 Independent Environmental Audit – Action Plan

An independent audit covering the period from 16 February 2019 to 11 March 2022 was conducted for Project Approval 07_0018 MOD9, Environmental Protection Licence 12559, and Consolidated Mining Lease 7, in March 2022. The actions and timeframes to address Non-compliances and Observations identified in the audit are addressed in the following tables.

Observations

Item No.	Condition	Requirement	Observations	Action	Date Required
	PA 07_0018 Sch2 Cond1	Obligation to Minimise Harm to the Environment The Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation or rehabilitation of the project.	Observation No. 1 To enable significant environmental risks to be proactively determined and addressed to minimise material harm, BHOP could review and update the existing site Environmental Risk Register that was last revised in 2010. BHOP's existing health and safety risk assessment could potentially be used as a template.	Observation No. 1 BHOP will review and update the existing site Environmental Risk Register. To be completed with MOD6 EA.	30 September 2022
	PA 07_0018 Sch2 Cond1	Obligation to Minimise Harm to the Environment The Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation or rehabilitation of the project.	Observation No. 2 BHOP should review, update as required, and reissue: a) the Dust Deposition Gauge Monitoring Procedure; b) the High Volume Air Sample Monitoring Procedure; and c) the Tapered Element Oscillating Microbalance (TEOM) Monitoring Procedure.	Observation No. 2 Procedures to be updated.	31 August 2022
	PA 07_0018 Sch2 Cond5	Limits on Approval – Mining Operations The Proponent may carry out mining operations on site until 31 December 2026. <i>Note to Condition 5: Under this approval, the Proponent is required to rehabilitate the site and carry out additional undertakings to the satisfaction of the Secretary. Consequently, this approval will continue to apply in all respects – other than the right to conduct mining operations - until the</i>	Observation No. 3 BHOP should ensure the issued Rehabilitation Management Plan includes the current mining operations end date.	Observation No. 3 BHOP will ensure that the current mining operations end date is included in the RMP.	2 July 2022



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		<i>rehabilitation of the site and these additional undertakings have been carried out satisfactorily.</i>			
	PA 07_0018 Sch2 Cond6	Limits on Approval – Production The Proponent shall not extract more than 750,000 tonnes of ore per annum, or more than 8,450,000 tonnes of ore over the life of the project.	Observation No. 4 For consistency with the use of “extract” in this condition, BHOP’s Annual Environmental Management Reports could be revised to: a) replace the “approved to produce” reference in the Introduction with “approved to extract”; and b) include a footnote to Table 2-2 (Ore and Waste Summary for the Reporting Period) to define “ore tonnes mined” as “extraction”.	Observation No. 4 BHOP will revise the production summaries in future AEMRs to refer to “extraction” as defined in this condition.	Ongoing
	PA 07_0018 Sch2 Cond8	Structural Adequacy 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. <i>Notes to Condition 8:</i> <ul style="list-style-type: none"> • Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works; and • Part 8 of the EP&A Regulation sets out the requirements for the certification of the project. 	Observation No. 5 Section 5.1 of the 2021 Annual Environmental Management Report incorrectly states that no buildings were constructed on CML7 in “2020”; this reference should be “2021”.	Observation No. 5 Corrected.	Complete



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Item No.	Condition	Requirement	Observations	Action	Date Required
	PA 07_0018 Sch2 Cond10	Operation of Plant and Equipment The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Observation No. 6 BHOP could investigate why the most recent record in Pronto for 'raw water filter and clean' of the washbay at the entrance to the mining area of the site was on 14 January 2019 (i.e. more than 3 years prior to March 2022).	Observation No. 6 To be investigated.	31 August 2022
	PA 07_0018 Sch2 Cond10	Operation of Plant and Equipment The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Observation No. 7 BHOP could investigate why the most recent record in Pronto for the monthly electrical service of TEOM2 was on 10 November 2020 (i.e. more than 15 months prior to March 2022).	Observation No. 7 To be investigated.	31 August 2022
	PA 07_0018 Sch2 Cond10	Operation of Plant and Equipment The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Observation No. 8 To facilitate scheduling for maintenance of environmental assets (e.g. monitoring equipment) and assigning priority status for repair and replacement, BHOP could include all relevant environmental assets in Pronto. As of March 2022, the only environmental assets recorded in Pronto were the two TEOM units.	Observation No. 8 All environmental assets and maintenance scheduling to be entered into Pronto.	31 August 2022
	PA 07_0018 Sch2 Cond10	Operation of Plant and Equipment The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and	Observation No. 9 To improve the ongoing status of compliance with monitoring requirements of the Project Approval and EPL, the maintenance, repair and replacement of environmental monitoring equipment could be assigned a priority '1' status in Pronto.	Observation No. 9 BHOP has assigned to the servicing, maintenance and repair of BHOP's environmental monitoring equipment a Priority 1 status in the Pronto system.	Complete



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		(b) operated in a proper and efficient manner.			
	PA 07_0018 Sch2 Cond10	Operation of Plant and Equipment The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Observation No. 10 BHOP could review and potentially reduce the existing 24 month service interval between filter bags replacement in the Crusher Baghouse.	Observation No. 10 To be reviewed.	31 August 2022
	PA 07_0018 Sch2 Cond10	Operation of Plant and Equipment The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Observation No. 11 BHOP should review its data entry processes and confirm that preventative maintenance task numbers for fixed assets (in particular, critical assets such as the Horwood Dam pump and Crusher Baghouse) have been consistently entered into Pronto.	Observation No. 11 BHOP will review its data entry processes and confirm that preventative maintenance task numbers for fixed assets are consistently entered into Pronto.	31 August 2022
	PA 07_0018 Sch2 Cond10	Operation of Plant and Equipment The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Observation No. 12 BHOP could consider implementing a program to scan and include PDF versions of relevant operating manuals with the relevant Pronto items.	Observation No. 12 BHOP will consider digitising operating manuals to be attached to relevant Pronto items.	31 August 2022
	PA 07_0018 Sch2 Cond10	Operation of Plant and Equipment The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Observation No. 13 For the Crusher Baghouse, BHOP could ensure the Pronto system contains up-to-date information regarding the quantity of spare filter bags in stock.	Observation No. 13 BHOP to ensure inventory of Baghouse filter bags is correct in Pronto.	31 July 2022



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		(a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.			
	PA 07_0018 Sch2 Cond10	Operation of Plant and Equipment The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Observation No. 14 BHOP could review the inspection and maintenance schedule for roller door mechanisms in all relevant structures, to ensure the roller doors provide a complete seal when in the fully closed position.	Observation No. 14 BHOP to review inspection and maintenance of rollers door mechanisms to ensure doors operate and seal correctly.	31 August 2022
	PA 07_0018 Sch2 Cond10	Operation of Plant and Equipment The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Observation No. 15 BHOP could consider whether completed site inspections (including workshop) could be validated by: • using an electronic checklist on a tablet or other device instead of using hard copy checklists; or • requiring hard copy inspection checklists to either be attached or referenced (e.g. by a unique checklist number) in Pronto.	Observation No. 15 BHOP to consider electronic checklists for site inspections or attaching hard copies of inspections in Pronto.	31 August 2022
	PA 07_0018 Sch2 Cond10	Operation of Plant and Equipment The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Observation No. 16 Completed hard copy inspection forms could be scanned and entered into Pronto: • to facilitate ease of reference in tracking relevant work orders from the date of inspection (as distinct from date of entry into Pronto) to date of completion; and • as a back-up measure in the event that the original completed hard-copy forms are mislaid.	Observation No. 16 BHOP to consider digitising hard copies of inspection checklists to Pronto.	31 August 2022
	PA 07_0018 Sch3 Cond2	Air Quality and Greenhouse Gas – Greenhouse Gas Emissions	Observation No. 17 BHOP could develop and implement a suitable greenhouse	Observation No. 17 BHOP will consider the	30 September 2022



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		The Proponent shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site to the satisfaction of the Secretary.	gas emissions reduction program, inclusive of formal programs for greenhouse gas reduction and improved energy efficiency.	development of a greenhouse gas emissions reduction program.	
	PA 07_0018 Sch3 Cond2	Air Quality and Greenhouse Gas – Greenhouse Gas Emissions The Proponent shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site to the satisfaction of the Secretary.	Observation No. 18 BHOP could calculate 'unit' greenhouse gas emissions, as CO2 per tonne of lead and/or zinc concentrate produced, from commencement of operations to date. This will provide suitable baseline data for any planned energy and emissions reduction program that may be progressed in the future.	Observation No. 18 BHOP will consider the value in recording the unit emissions of greenhouse, as CO2 per tonne of lead and/or zinc concentrate produced, since the commencement of operations.	30 September 2022
	PA 07_0018 Sch3 Cond2	Air Quality and Greenhouse Gas – Greenhouse Gas Emissions The Proponent shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site to the satisfaction of the Secretary.	Observation No. 19 BHOP could consider the feasibility of reaching an agreement with AGL (i.e. the owner of the Broken Hill Solar Farm and Silverton Wind Farm) to source a specified percentage of energy consumed on site as renewable/green energy.	Observation No. 19 BHOP will investigate an agreement with their energy provider to source portion of energy consumed from renewable sources.	30 September 2022
	PA 07_0018 Sch3 Cond2	Air Quality and Greenhouse Gas – Greenhouse Gas Emissions The Proponent shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site to the satisfaction of the Secretary.	Observation No. 20 BHOP could consider the feasibility of purchasing and retiring carbon offsets.	Observation No. 20 BHOP to consider the purchase of carbon offsets.	30 September 2022
	PA 07_0018 Sch3 Cond2	Air Quality and Greenhouse Gas – Greenhouse Gas Emissions The Proponent shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site to the satisfaction of the Secretary.	Observation No. 21 BHOP could consider formalising (i.e. in a CBH/BHOP	Observation No. 21 BHOP to consider developing	30 August 2022



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		The Proponent shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site to the satisfaction of the Secretary.	document) greenhouse gas and energy efficiency criteria (e.g. minimum acceptable criteria) for relevant plant and equipment procurement decisions.	formal energy efficiency criteria for plant and equipment procurement.	
	PA 07_0018 Sch3 Cond2	Air Quality and Greenhouse Gas – Greenhouse Gas Emissions The Proponent shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site to the satisfaction of the Secretary.	Observation No. 22 BHOP could commission an independent energy audit of the project to: a) identify opportunities for reductions in greenhouse gas emissions; b) identify opportunities for improvement in energy efficiency; c) identify opportunities for energy cost savings; and d) provide information to BHOP's parent company for sustainability reporting purposes.	Observation No. 22 BHOP to consider the commissioning of an independent energy audit.	31 December 2022
	PA 07_0018 Sch3 Cond3	Air Quality and Greenhouse Gas – Air Quality Criteria 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 cause an exceedance of the criteria listed in Tables 1, 2 or 3 at any residence on privately-owned land.	Observation No. 23 BHOP could review section 1.3 (Dust Deposition Sampling) in Monthly Environment Monitoring Reports to ensure that deposited dust data and commentary for each dust deposition gauge is expressed in terms of compliance against the "annual" averaging period specified in Table 3 of this condition.	Observation No. 23 BHOP to consider presenting data in section 1.3 of Monthly Environmental Monitoring Reports in terms of compliance against annual averaging.	31 July 2022
	PA 07_0018 Sch3 Cond3	Air Quality and Greenhouse Gas – Air Quality Criteria 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 cause an exceedance of the criteria listed in Tables 1, 2 or 3 at	Observation No. 24 BHOP should review the results table for Dust Deposition Gauges D1 to D7 in BHOP's Monthly Environment Monitoring Reports. Several reports (e.g. December 2020, March 2021, June 2021, and November 2021) incorrectly indicate a 'non-compliance' at D1 against an unspecified g/m2 /month limit (i.e. could be either "maximum project	Observation No. 24 BHOP will review and correct where required results for Dust Depositional Gauges in Monthly Environment Monitoring Reports.	31 August 2022



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		any residence on privately-owned land.	level” or “maximum total deposited dust contribution”).		
	PA 07_0018 Sch3 Cond3	Air Quality and Greenhouse Gas – Air Quality Criteria 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 cause an exceedance of the criteria listed in Tables 1, 2 or 3 at any residence on privately-owned land.	Observation No. 25 To improve the reproducibility and quality control of deposited dust results, BHOP could consider collecting a duplicate sample for deposited dust once per quarter at one location and submitting that sample as a blind sample to the laboratory (i.e. a total of four samples per year).	Observation No. 25 BHOP will consider collecting a duplicate sample for depositional dust once per quarter and submit as a blind sample to the laboratory (i.e. a total of four samples per year).	30 September 2022
	PA 07_0018 Sch3 Cond4	Air Quality and Greenhouse Gas – Air Quality Criteria The Proponent shall ensure that the project is operated in a manner that does not exceed the criteria listed in Tables 4 and 5.	Observation No. 26 BHOP is encouraged to review current service agreements with external suppliers to verify the status of supply and immediate availability of spare filter bags on site or within Broken Hill.	Observation No. 26 BHOP will review current service agreements with external suppliers to verify the status of supply and immediate availability of spare bags on site or within Broken Hill.	31 October 2022
	PA 07_0018 Sch3 Cond4	Air Quality and Greenhouse Gas – Air Quality Criteria The Proponent shall ensure that the project is operated in a manner that does not exceed the criteria listed in Tables 4 and 5.	Observation No. 27 Where point source air emissions have not exceeded the approved discharge criteria limits but have been measured to be within 20% of these limits (i.e. an internal investigation trigger), BHOP should investigate the exceedance to help prevent potential exceedances of discharge criteria in the future.	Observation No. 27 BHOP to begin investigating results of point source air emissions that approach discharge limits within 20%.	31 October 2022
	PA 07_0018 Sch3 Cond4	Air Quality and Greenhouse Gas – Operating Conditions The Proponent shall seal and maintain the roads	Observation No. 28 BHOP should prioritise the repair, resealing and possible widening (as required) of the sealed roads identified in	Observation No. 28 BHOP to investigate roads in this condition which require repair.	31 October 2022



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		listed in Table 6 to the satisfaction of the Secretary. The roads shall be sealed prior to the commencement of ore extraction, unless otherwise agreed by the Secretary.	Table 6 of this condition, potentially in conjunction with Mod 6 works, to minimise potential dust emissions from these roads arising from vehicle movements and/or high winds.		
	PA 07_0018 Sch3 Cond10	Air Quality and Greenhouse Gas – Operating Conditions Video recording equipment shall be installed to assist in the active management of emissions from the tailings storage facility.	Observation No. 29 In addition to the Environment Office, BHOP could display the real-time TSF2 camera images in the Emergency Services Office, which may assist BHOP in responding to visible dust emissions from TSF2 in a timely manner when the Environment Office is not occupied (e.g. on weekends or if environmental personnel are in the field and not in line-of-sight of TSF2).	Observation No. 29 BHOP to have TSF2 camera imagery installed in ESO office.	Complete
	PA 07_0018 Sch3 Cond11	Air Quality and Greenhouse Gas – Air Quality Management Plan The Proponent shall prepare and implement a detailed Air Quality Management Plan for the project to the satisfaction of the Secretary.	Observation No. 30 BHOP could potentially delete the Air Quality Monitoring Program Management Plan (issued on 28 July 2016), which appears to be redundant given the inclusion of the Air Quality Monitoring Program (dated February 2019) as Appendix E of the Air Quality Management Plan.	Observation No. 30 BHOP to amend Air Quality Monitoring Program Management Plan to be as part of AQMP review.	Submitted for review.
	PA 07_0018 Sch3 Cond11	Air Quality and Greenhouse Gas – Air Quality Management Plan The Proponent shall prepare and implement a detailed Air Quality Management Plan for the project to the satisfaction of the Secretary.	Observation No. 31 Figure 1 in the Air Quality Management Plan refers to the possibly redundant Air Quality Monitoring Program Management Plan (issued on 28 July 2016).	Observation No. 31 BHOP to update Figure 1 in AQMP accordingly.	Complete
	PA 07_0018 Sch3 Cond11	Air Quality and Greenhouse Gas – Air Quality Management Plan The Proponent shall prepare and implement a	Observation No. 32 BHOP should review and update Table 7 in the Air Quality Management Plan, which:	Observation No. 32 BHOP to review Table 7 and update to company standard.	Complete



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		detailed Air Quality Management Plan for the project to the satisfaction of the Secretary.	<ul style="list-style-type: none"> • does not follow accepted industry practice of assigning increasing numeric scores for increasing severity of consequence categories; • describes only two categories of 'probability'; • describes only three risk classifications of low, medium and high; • does not clearly define control actions (e.g. frequency of application of chemical dust suppressant is not defined, and the 80% control figure is not referable to a relevant standard); and • does not clearly identify residual risk after the implementation of controls. 		
	PA 07_0018 Sch3 Cond12	<p>Lead Awareness and Public Health – Contribution to Public Blood lead Monitoring & Public Education</p> <p>During the implementation of the project, the Proponent shall make a reasonable contribution towards the cost of:</p> <p>(a) public health monitoring, particularly in relation to child blood lead levels; and</p> <p>(b) public education campaigns about the health risks associated with lead, to the satisfaction of the Secretary.</p> <p><i>Note: The Secretary will consult with the Director-General of the NSW Department of Health on the reasonableness of the proposed contribution prior to making any decisions under this condition, and determine the date upon which the contributions shall commence.</i></p>	<p>Observation No. 33</p> <p>In Appendix C of the Community Lead Management Plan, the reference to "Section 5" should instead refer to "Section 8".</p>	<p>Observation No. 33</p> <p>BHOP to update Appendix C in CLMP.</p>	31 July 2022
	PA 07_0018 Sch3 Cond12	<p>Lead Awareness and Public Health – Contribution to Public Blood lead Monitoring & Public Education</p> <p>During the implementation of the project, the Proponent shall make a reasonable contribution</p>	<p>Observation No. 34</p> <p>BHOP could review the Community Lead Management Plan to include details of any other public health monitoring and public education campaigns which BHOP</p>	<p>Observation No. 34</p> <p>BHOP to consider the inclusion of other public health monitoring and public health campaigns supported</p>	31 July 2022



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		<p>towards the cost of:</p> <p>(a) public health monitoring, particularly in relation to child blood lead levels; and</p> <p>(b) public education campaigns about the health risks associated with lead, to the satisfaction of the Secretary.</p> <p><i>Note: The Secretary will consult with the Director-General of the NSW Department of Health on the reasonableness of the proposed contribution prior to making any decisions under this condition, and determine the date upon which the contributions shall commence.</i></p>	supports.	in the CLMP.	
	PA 07_0018 Sch3 Cond12	<p>Lead Awareness and Public Health – Contribution to Public Blood lead Monitoring & Public Education</p> <p>During the implementation of the project, the Proponent shall make a reasonable contribution towards the cost of:</p> <p>(a) public health monitoring, particularly in relation to child blood lead levels; and</p> <p>(b) public education campaigns about the health risks associated with lead, to the satisfaction of the Secretary.</p> <p><i>Note: The Secretary will consult with the Director-General of the NSW Department of Health on the reasonableness of the proposed contribution prior to making any decisions under this condition, and determine the date upon which the contributions shall commence.</i></p>	<p>Observation No. 35</p> <p>In order to increase the likelihood of the funding being used, BHOP could consider amending section 8 and Appendix C of the Community Lead Management Plan to specify that other Department of Health agencies (i.e. apart from the BHCFHC) could submit a proposal for potential funding.</p>	<p>Observation No. 35</p> <p>BHOP will consider including details of other public health monitoring and education campaigns in the next review of the CLMP.</p>	31 July 2022
	PA 07_0018 Sch3 Cond13	<p>Lead Awareness and Public Health – Lead Management Plan</p> <p>The Proponent shall prepare and implement a Lead Management Plan for the project to the satisfaction</p>	<p>Observation No. 36</p> <p>BHOP could report on community blood lead levels and analyse blood level trends in future Annual Environmental Management Reports, possibly using information in or</p>	<p>Observation No. 36</p> <p>BHOP will consider reporting on community blood lead levels and analysing trends in future Annual</p>	1 March 2023



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		<p>of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with the Lead Reference Group, including the NSW Department of Health (Western NSW Local Health District) and Council;</p> <p>(b) be submitted to the Secretary for approval by 30 June 2011;</p> <p>(c) outline the proposed commitment towards the cost of:</p> <ul style="list-style-type: none"> • public health monitoring, particularly in relation to child blood lead levels, and tracking of this data over time; and • public education campaigns about the health risks associated with lead, including lead hygiene, lead and children, tank water lead risks and soil lead contamination risks. <p>(d) identify additional reasonable and feasible measures that could be implemented either on site or in the areas adjoining the site to minimise the potential lead impacts of the project and “free areas”;</p> <p>(e) include a program for the staged implementation of the measures identified in (d) above in the event that dust emissions are higher than predicted or the public health monitoring suggests further action is required to reduce blood lead levels in the environment surrounding the site; and</p> <p>(f) include a detailed communication strategy, that outlines how the relevant dust and blood level monitoring data would be reported on the Proponent’s website along with any relevant public education material.</p>	<p>attached to the Minutes of Lead Reference Group meetings for supporting data.</p>	<p>Environmental Management Reports.</p>	
	PA 07_0018 Sch3 Cond13	<p>Lead Awareness and Public Health – Lead Management Plan</p> <p>The Proponent shall prepare and implement a Lead</p>	<p>Observation No. 37</p> <p>As of March 2022, BHOP’s Community Lead Management Plan (CLMP) is overdue for revision and potential update.</p>	<p>Observation No. 37</p> <p>BHOP will include additional feasible measures that could be</p>	31 July 2022



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		<p>Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with the Lead Reference Group, including the NSW Department of Health (Western NSW Local Health District) and Council;</p> <p>(b) be submitted to the Secretary for approval by 30 June 2011;</p> <p>(c) outline the proposed commitment towards the cost of:</p> <ul style="list-style-type: none"> • public health monitoring, particularly in relation to child blood lead levels, and tracking of this data over time; and • public education campaigns about the health risks associated with lead, including lead hygiene, lead and children, tank water lead risks and soil lead contamination risks. <p>(d) identify additional reasonable and feasible measures that could be implemented either on site or in the areas adjoining the site to minimise the potential lead impacts of the project and “free areas”;</p> <p>(e) include a program for the staged implementation of the measures identified in (d) above in the event that dust emissions are higher than predicted or the public health monitoring suggests further action is required to reduce blood lead levels in the environment surrounding the site; and</p> <p>(f) include a detailed communication strategy, that outlines how the relevant dust and blood level monitoring data would be reported on the Proponent’s website along with any relevant public education material.</p>	<p>Revision of the CLMP could identify any additional reasonable and feasible measures as referred to in paragraph (d) of this condition, based on relevant data from the Mod 6 Human Health Risk Assessment and public health monitoring of blood lead levels.</p>	<p>implemented to minimise potential lead impacts of the project.</p>	
	PA 07_0018 Sch3 Cond13	Lead Awareness and Public Health – Lead Management Plan	<p>Observation No. 38</p> <p>In the next revision of the Community Lead Management</p>	<p>Observation No. 38</p> <p>Appendix A and B of the CLMP to</p>	31 July 2022



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		<p>The Proponent shall prepare and implement a Lead Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with the Lead Reference Group, including the NSW Department of Health (Western NSW Local Health District) and Council; (b) be submitted to the Secretary for approval by 30 June 2011; (c) outline the proposed commitment towards the cost of: <ul style="list-style-type: none"> • public health monitoring, particularly in relation to child blood lead levels, and tracking of this data over time; and • public education campaigns about the health risks associated with lead, including lead hygiene, lead and children, tank water lead risks and soil lead contamination risks. (d) identify additional reasonable and feasible measures that could be implemented either on site or in the areas adjoining the site to minimise the potential lead impacts of the project and “free areas”; (e) include a program for the staged implementation of the measures identified in (d) above in the event that dust emissions are higher than predicted or the public health monitoring suggests further action is required to reduce blood lead levels in the environment surrounding the site; and (f) include a detailed communication strategy, that outlines how the relevant dust and blood level monitoring data would be reported on the Proponent’s website along with any relevant public education material. 	<p>Plan, Appendix A (Sensitive Receptor Locations) and Appendix B (Air Quality Monitoring Locations) could be reviewed and updated.</p>	<p>be reviewed and updated where required in next review of CLMP.</p>	
	PA 07_0018 Sch3 Cond15	Noise and Vibration – Hours of Operation	Observation No. 39	Observation No. 39	31 July 2022



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		<p>Unless the Secretary agrees otherwise, the Proponent must comply with the operating hours in Table 6.1.</p> <p><i>Table 6.1: Operating Hours</i></p> <table><tr><th>Activity</th><th>Hours</th></tr><tr><td>Construction</td><td>7 am to 6 pm, Monday to Friday</td></tr><tr><td>Capping and rehabilitation of TSF2</td><td>8 am to 1 pm, Saturday</td></tr><tr><td>Shunting of concentrate wagons</td><td>No activities on Sundays or public holidays</td></tr><tr><td>Production rock blasting</td><td>7 am and 6 pm on any day</td></tr><tr><td>Transporting cement to the cement silo</td><td>6:45am and 7:15pm on any day</td></tr><tr><td>Loading the cement silo</td><td>7 am to 7 pm on any day</td></tr><tr><td>All other activities</td><td>24 hours a day, 7 days a week</td></tr></table>	Activity	Hours	Construction	7 am to 6 pm, Monday to Friday	Capping and rehabilitation of TSF2	8 am to 1 pm, Saturday	Shunting of concentrate wagons	No activities on Sundays or public holidays	Production rock blasting	7 am and 6 pm on any day	Transporting cement to the cement silo	6:45am and 7:15pm on any day	Loading the cement silo	7 am to 7 pm on any day	All other activities	24 hours a day, 7 days a week	<p>Following Mod 6 approval, the requirements of this condition could be proactively communicated on the CBH website, to allow these requirements to be known and understood by the community (i.e. in addition to being available via Table 6.1 in the Project Approval).</p>	<p>BHOP will review the information provided on the website to communicate the operating hours.</p>	
Activity	Hours																				
Construction	7 am to 6 pm, Monday to Friday																				
Capping and rehabilitation of TSF2	8 am to 1 pm, Saturday																				
Shunting of concentrate wagons	No activities on Sundays or public holidays																				
Production rock blasting	7 am and 6 pm on any day																				
Transporting cement to the cement silo	6:45am and 7:15pm on any day																				
Loading the cement silo	7 am to 7 pm on any day																				
All other activities	24 hours a day, 7 days a week																				
	PA 07_0018 Sch3 Cond17	<p>Noise and Vibration – Noise Limits</p> <p>The Proponent shall ensure that the noise generated by the project does not exceed the criteria in Table 7.</p>	<p>Observation No. 40</p> <p>BHOP could ensure that:</p> <p>a) attended noise monitoring surveys are conducted when the mill is operational (i.e. when project-generated noise is likely to be higher than when the mill is non-operational); and</p> <p>b) survey reports clearly define the mill’s operational status.</p>	<p>Observation No. 40</p> <p>BHOP to schedule attended noise surveys when the mill is operational and the status of the mill is included in survey reports.</p>	31 August 2022																
	PA 07_0018 Sch3 Cond17	<p>Noise and Vibration – Noise Limits</p> <p>The Proponent shall ensure that the noise generated by the project does not exceed the criteria in Table 7.</p>	<p>Observation No. 41</p> <p>BHOP could commence internal noise monitoring up to 30 minutes before 7:00am to establish the background noise level on that day before the commencement of day-time mining activities.</p>	<p>Observation No. 41</p> <p>BHOP to consider undertaking noise monitoring in the 30 minutes leading up to 7am to establish background noise level for the day.</p>	31 July 2022																
	PA 07_0018 Sch3 Cond17	<p>Noise and Vibration – Noise Limits</p> <p>The Proponent shall ensure that the noise generated by the project does not exceed the criteria in Table 7.</p>	<p>Observation No. 42</p> <p>BHOP should formally investigate noise limit exceedances recorded during internal noise monitoring activities, to confirm that the exceedances are not attributable to noise generated by the project.</p>	<p>Observation No. 42</p> <p>BHOP will investigate noise limit exceedances during internal noise monitoring activities.</p>	On going																



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Item No.	Condition	Requirement	Observations	Action	Date Required
	PA 07_0018 Sch3 Cond17	Noise and Vibration – Noise Limits The Proponent shall ensure that the noise generated by the project does not exceed the criteria in Table 7.	Observation No. 43 BHOP is encouraged to conduct regular noise surveys (i.e. using a calibrated noise meter) during Mod 6 works and any other activity (e.g. surface drilling near the site boundary), which could cause an exceedance of applicable noise limits at any monitoring location in Table 7 of this condition.	Observation No. 43 BHOP to conducted regular noise surveys during MOD6 works and other activities nearing the site boundary.	On going
	PA 07_0018 Sch3 Cond17	Noise and Vibration – Noise Limits The Proponent shall ensure that the noise generated by the project does not exceed the criteria in Table 7.	Observation No. 44 BHOP should consider engaging the external consultant (EMM) to conduct attended noise monitoring at times of day other than at 'night', to assess the operation's compliance with 'day' and 'evening' noise limits in Table 7 of this condition.	Observation No. 44 BHOP to consider conducting noise monitoring in day and evening periods to test compliance with noise limits.	31 August 2022
	PA 07_0018 Sch3 Cond18	Noise and Vibration – Blasting Limits The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Tables 8 and 9.	Observation No. 45 BHOP's Technical Services Department could be requested to provide input into section 2.1 (Blasting) of each Monthly Environment Monitoring Report, regarding whether any airblast overpressure exceedance recorded against the relevant conditions of the Project Approval and EPL is attributable to blasting activities during the reporting period.	Observation No. 45 BHOP to investigate how to include over pressure in Monthly Environment Monitoring Report.	Complete
	PA 07_0018 Sch3 Cond20	Noise and Vibration – Noise and Blast Management Plan The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary.	Observation No. 46 The footer of the Noise Monitoring Management Plan (issued on 25 June 2019) changes from 'revision no. 5', to 'revision no. 3' from page 26 onwards.	Observation No. 46 BHOP to correct formatting in the Noise Monitoring Management Plan.	31 July 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
	PA 07_0018 Sch3 Cond20	Noise and Vibration – Noise and Blast Management Plan The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary.	Observation No. 47 BHOP should rectify the duplication of Section 6.3 (Noise Monitoring Locations, Action Limits) in the Noise Monitoring Management Plan (NMMP). The Action Limits heading is embedded in Table 3 of the NMMP.	Observation No. 47 BHOP to rectify the duplication in current review of Noise Monitoring Management Plan.	31 July 2022
	PA 07_0018 Sch3 Cond23	Soil and Water – Water Management Plan The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with EPA, DPIE Water and RR.	Observation No. 48 BHOP should rectify the inconsistent Doc ID in the header of the Site Water Management Plan, which changes from “BHO-PLN-ENV-006” in pages 1 to 18, to “BHO-PLN-ENV-004” in pages 19 to 48. BHO-PLN-ENV-006 is already used for BHOP’s Blasting Monitoring Program Management Plan.	Observation No. 48 BHOP to ensure Management Plans have consistent document control throughout.	31 July 2022
	PA 07_0018 Sch3 Cond23	Soil and Water – Water Management Plan The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with EPA, DPIE Water and RR.	Observation No. 49 The new stormwater pond to the north of TSF2 Embankment 2 could be included (with design storage details) in the next revision of the Site Water Management Plan, with possibly an ARI assigned.	Observation No. 49 BHOP to include the new stormwater pond to the north of TSF2 Embankment 2 to the Site Water Management Plan.	Complete
	PA 07_0018 Sch3 Cond23	Soil and Water – Water Management Plan The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be consistent with	Observation No. 50 Sections 10.5.1 to 10.5.15 of the previous Site Water Management Plan (Golder Associates, 30 April 2012, report no. 097626108-007-R-Rev11) state that BHOP will	Observation No. 50 BHOP to investigate the status of works referenced in 2012 version of Site Water Management Plan.	31 July 2022



Item No.	Condition	Requirement	Observations	Action	Date Required
		the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with EPA, DPIE Water and RR.	carry out a series of works and actions (e.g. section 10.5.5 states that BHOP will: "Install a culvert in catchment 16 to direct runoff to S17"). BHOP should confirm: a) the status of the works and actions referred to in the Golder Associates SWMP; and b) that these works and actions have been entered and closed out in INX InControl.		
	PA 07_0018 Sch3 Cond23	Soil and Water – Water Management Plan The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with EPA, DPIE Water and RR.	Observation No. 51 Reasons for the absence of on-site surface water quality background data (i.e. the longstanding, disturbed nature of the site) could be provided in section 8.3 of the Site Water Management Plan. The relevant sentence in section 8.3 of the SWMP currently reads: "No initial background water quality values were identified for surface water at the site.	Observation No. 51 BHOP to include surface water study as part of RMP.	Ongoing
	PA 07_0018 Sch3 Cond23	Soil and Water – Water Management Plan The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with EPA, DPIE Water and RR.	Observation No. 52 BHOP could improve the readability of Figure 4 in the Site Water Management Plan by identifying the solid lines (Direct Flow) and dashed lines (Overflow) with different colours.	Observation No. 52 BHOP to consider the value in differentiating between direct flow and overflow on Figure 4 in the SWMP.	31 July 2022
	PA 07_0018 Sch3 Cond23	Soil and Water – Water Management Plan The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to	Observation No. 53 Section 5.3 of the Site Water Management Plan (SWMP) describes the location of the Backfill Plant as: "The Backfill Plant is located to the south west of the site in C27." BHOP could amend this description to refer to the north west of the site in C27, and indicate the location of the Backfill	Observation No. 53 BHOP to correct location of the Backfill Plant in the SWMP.	31 July 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
		reflect the final detailed design of the project, and be prepared in consultation with EPA, DPIE Water and RR.	Plant in Figure 1 of the SWMP.		
	PA 07_0018 Sch3 Cond23	Soil and Water – Water Management Plan The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with EPA, DPIE Water and RR.	Observation No. 54 BHOP should rectify the incorrect reference to “air quality monitoring” in section 11.2 of the Site Water Management Plan.	Observation No. 54 BHOP to correct SWMP in current review.	31 July 2022
	PA 07_0018 Sch3 Cond23	Soil and Water – Water Management Plan The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with EPA, DPIE Water and RR.	Observation No. 55 Given that minor seepage was observed at the S49 Ryan Street Dam on 10 March 2022 after 9 days with no rain, BHOP could investigate whether additional seepage controls (or methods, as referred to in section 9.1 of the Site Water Management Plan) are required at the S49 Ryan Street Dam.	Observation No. 55 Further seepage mitigation methods to be investigated for S49.	Ongoing
	PA 07_0018 Sch3 Cond29	Transport – Traffic Management Plan The Proponent shall prepare and implement a traffic management plan to the satisfaction of the Secretary. The plan shall focus on traffic management during construction of the project, and must be developed in consultation with the RMS and Council. The plan must be submitted for the approval of the Secretary prior to the	Observation No. 56 The Traffic Management Plan (TMP) dated 20 July 2011 is currently labelled as a GR Engineering Services document. When reviewing and updating the TMP (possibly to coincide with Mod 6 works), BHOP could consider issuing the revised TMP as a BHOP document.	Observation No. 56 When reviewing and updating the TMP, BHOP will issue the revised TMP as a BHOP document.	31 July 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
		commencement of construction.			
	PA 07_0018 Sch3 Cond30	Heritage The Proponent shall prepare and implement a Conservation Management Plan for the site to the satisfaction of the Secretary. This plan must provide a strategic framework for all heritage items located on the Lease, based on the principles of the Burra Charter, and developed in consultation with the Heritage Council and Council. The plan must be submitted for the approval of the Secretary by December 2011.	Observation No. 57 BHOP is encouraged to request GML Heritage to review, update and finalise the draft September 2015 Conservation Management Plan. Once received, this final version is required to be submitted for approval of the Secretary.	Observation No. 57 BHOP will finalise and submit for approval the Conservation Management Plan as part of the development of the RMP.	31 December 2022
	PA 07_0018 Sch3 Cond32	Waste The Proponent shall: (a) minimise the waste generated by the project; and (b) ensure that the waste generated by the project is appropriately stored, handled, and disposed of, to the satisfaction of the Secretary.	Observation No. 58 BHOP could consider allowing a local community organisation to place container recycling bins (for containers that attract a 10 cent refund) in the site administration area and workshop, to enable that organisation to remove those items and receive proceeds from a local Reverse Vending Machine.	Observation No. 58 BHOP to investigate current practice for can and bottle recycling and determine if a local community group are interested in collecting from site.	31 August 2022
	PA 07_0018 Sch3 Cond32	Waste The Proponent shall: (a) minimise the waste generated by the project; and (b) ensure that the waste generated by the project is appropriately stored, handled, and disposed of, to the satisfaction of the Secretary.	Observation No. 59 On an annual frequency, BHOP could verify and retain records of the validity of the licences of all its hazardous waste contractors.	Observation No. 59 On an annual frequency, BHOP will verify that the licences of all regulated waste contractors utilised by BHOP are valid.	30 September 2022 and annually thereafter
	PA 07_0018 Sch3 Cond32	Waste	Observation No. 60	Observation No. 60	31 December 2022 and ongoing



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Item No.	Condition	Requirement	Observations	Action	Date Required
		The Proponent shall: (a) minimise the waste generated by the project; and (b) ensure that the waste generated by the project is appropriately stored, handled, and disposed of, to the satisfaction of the Secretary.	BHOP should ensure its hazardous waste contractors provide EPA tracking numbers on all submitted invoices.	BHOP will review existing processes that are being utilised by licensed waste contractors that remove regulated waste off-site. BHOP will ensure that processes for retaining these records are consistent and effectively utilised.	
	PA 07_0018 Sch3 Cond32	Waste The Proponent shall: (a) minimise the waste generated by the project; and (b) ensure that the waste generated by the project is appropriately stored, handled, and disposed of, to the satisfaction of the Secretary.	Observation No. 61 BHOP could request its hazardous waste contractors to provide annual reports to BHOP, defining all hazardous waste removed from site and the relevant waste tracking numbers.	Observation No. 61 Annual reports defining all regulated waste removed from site and the relevant waste tracking numbers could be requested from all external contractors that remove regulated waste from the Rasp Mine site.	30 September 2022 and annually thereafter
	PA 07_0018 Sch3 Cond32	Waste The Proponent shall: (a) minimise the waste generated by the project; and (b) ensure that the waste generated by the project is appropriately stored, handled, and disposed of, to the satisfaction of the Secretary.	Observation No. 62 BHOP could potentially improve the temporary storage of waste awaiting transport off-site by: a) designating an undercover area (weather protected) for the waste; and b) placing drums which potentially contain hydrocarbon waste, in a bunded area, instead of on wooden pallets.	Observation No. 62 BHOP to consider redesigning temporary waste storage on site.	30 September 2022
	PA 07_0018 Sch3 Cond32	Waste The Proponent shall: (a) minimise the waste generated by the project; and (b) ensure that the waste generated by the project is appropriately stored, handled, and disposed of, to the satisfaction of the Secretary.	Observation No. 63 During this March 2022 audit, it was observed that BHOP workshop personnel could improve waste segregation practices. For example, there was evidence of hydrocarbon contaminated waste being incorrectly discarded in general waste skip bins.	Observation No. 63 Toolbox talks to be conducted to operators on appropriate waste disposal.	30 November 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
	PA 07_0018 Sch3 Cond32	Waste The Proponent shall: (a) minimise the waste generated by the project; and (b) ensure that the waste generated by the project is appropriately stored, handled, and disposed of, to the satisfaction of the Secretary.	Observation No. 64 During this March 2022 audit, it was observed that a significant number of used intermediate bulk containers (IBCs) utilised for the storage of hydrocarbon contaminated waste were only partially full. BHOP could fill each IBC prior to collection, to prevent contractor fees being incurred for removal of partially filled IBCs.	Observation No. 64 To be included in toolbox talk, as above.	30 November 2022
	PA 07_0018 Sch3 Cond33	Waste The Proponent shall prepare and implement a Waste Management Plan for the project to the satisfaction of the Secretary.	Observation No. 65 BHOP should assign a Doc ID (i.e. BHO-PLN-ENV-XXX) to the Waste Management Plan (25 June 2019).	Observation No. 65 Document ID to be assigned to Waste Management Plan.	31 August 2022
	PA 07_0018 Sch3 Cond33	Waste The Proponent shall prepare and implement a Waste Management Plan for the project to the satisfaction of the Secretary.	Observation No. 66 Section 3.1 of the Waste Management Plan states that the approved Mining Operations Plan is “available on the BHOP website”. If this statement is to be retained, BHOP should include the approved Mining Operations Plan on the CBH website.	Observation No. 66 Statement to be removed from Waste Management Plan.	31 August 2022
	PA 07_0018 Sch3 Cond33	Waste The Proponent shall prepare and implement a Waste Management Plan for the project to the satisfaction of the Secretary.	Observation No. 67 Section 3.2.3 of the Waste Management Plan could be revised to: <ul style="list-style-type: none"> • include predicted “surface tailings volume” and “cumulative tailings volume”, for the remaining life of mine (i.e. which as of March 2022, is until 31 December 2026); and • update Table 3-2 with post-2016 data regarding “actual tailings in TSF2”, and “actual total waste rock” and its on-site destination (i.e. in-pit and/or underground). 	Observation No. 67 Predicted tailings volumes for TSF2 to be included in next revision of Waste Management Plan.	31 August 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
	PA 07_0018 Sch3 Cond33	Waste The Proponent shall prepare and implement a Waste Management Plan for the project to the satisfaction of the Secretary.	Observation No. 68 Section 3.7 (Audits) of the Waste Management Plan could be amended to include a program of on-site waste management audits (conducted either internally or via an external provider) to identify potential improvements in waste management across the site.	Observation No. 68 BHOP to investigate potential for on-site waste management audits.	31 August 2022
	PA 07_0018 Sch3 Cond33	Waste The Proponent shall prepare and implement a Waste Management Plan for the project to the satisfaction of the Secretary.	Observation No. 69 BHOP could confirm that it is receiving accurate waste records from the relevant service provider (i.e. recorded weights/receipts from the BHCC landfill weighbridge) for waste that is removed from site and charged by weight.	Observation No. 69 BHOP to consider.	31 August 2022
	PA 07_0018 Sch3 Cond33	Waste The Proponent shall prepare and implement a Waste Management Plan for the project to the satisfaction of the Secretary.	Observation No. 70 BHOP could revise section 3.2.9 of the Waste Management Plan to remove the reference to keeping a register of concrete waste storage and removal, if not legally required.	Observation No. 70 BHOP to investigate whether it is a requirement and react accordingly.	31 August 2022
	PA 07_0018 Sch3 Cond33A	Waste The Proponent must update the Waste Management Plan required by condition 33 of this approval by December 2017, unless the Secretary agrees otherwise. The updated plan must include: (a) a long-term waste management strategy; and b) an action plan for the implementation of the key measures proposed to achieve the strategy. Following approval, the Proponent must implement the plan.	Observation No. 71 BHOP could consider whether the Waste Management Plan should clearly define that for mineral waste, the long-term waste management strategy is the Rehabilitation Strategy required under Project Approval Schedule 3, condition 34A.	Observation No. 71 BHOP to investigate how this would fit into the RMP.	31 July 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
	PA 07_0018 Sch3 Cond33A	Waste The Proponent must update the Waste Management Plan required by condition 33 of this approval by December 2017, unless the Secretary agrees otherwise. The updated plan must include: (a) a long-term waste management strategy; and b) an action plan for the implementation of the key measures proposed to achieve the strategy. Following approval, the Proponent must implement the plan.	Observation No. 72 Section 1.4 of the Waste Management Plan refers to achieving 60% total recycling of non-mineral waste. BHOP could schedule periodic internal audits against this 60% target, and if the target is not feasible, reassess the target.	Observation No. 72 BHOP to consider whether it is necessary to change the target for recycling of non-mineral waste.	31 August 2022
	PA 07_0018 Sch4 Cond1	Environmental Management – Environmental Management Strategy The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary.	Observation No. 73 BHOP could establish formal processes (i.e. via internal or external audit) to demonstrate ‘implementation’ of the Environment Management Strategy.	Observation No. 73 Consideration to be made to establish a formal process to demonstrate implementation of the Environment Management Strategy.	30 September 2022
	PA 07_0018 Sch4 Cond1	Environmental Management – Environmental Management Strategy The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary.	Observation No. 74 As of March 2022, BHOP was unable to provide evidence that a Rasp Mine Environment Risk Register was being maintained and updated at least every three years, as referred to in section 5.1 of the Environment Management Strategy.	Observation No. 74 BHOP to update Environment Risk Register and implement program to ensure revision and update at least every three years.	30 September 2022
	PA 07_0018 Sch4 Cond2	Environmental Management – Management Plan Requirements The Proponent shall ensure that the management plans required under this approval are prepared in accordance with relevant guidelines.	Observation No. 75 Appendix 2 in BHOP’s current Mining Operations Plan (1 October 2021 to 30 September 2023) lists the management plans required under the Project Approval, but: <ul style="list-style-type: none"> incorrectly identifies BHOP’s Environment Management 	Observation No. 75 Amend current MOP to correctly identify Environment Management Strategy and Rehabilitation Strategy and include TBMP and Conservation Management Plan.	31 July 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
			Strategy, and Rehabilitation Strategy, as Environmental Management Plans; • does not include the required Technical Blasting Management Plan; and • does not include the required Conservation Management Plan.		
	PA 07_0018 Sch4 Cond2	Environmental Management – Management Plan Requirements The Proponent shall ensure that the management plans required under this approval are prepared in accordance with relevant guidelines.	Observation No. 76 BHOP could consider whether paragraph (f) of this condition could potentially be satisfied by preparing information which would be included as a section or appendix in all Environmental Management Plans (EMPs). For example, the EMPs could include information regarding a BHOP committee which holds periodic meetings to discuss and record actions to potentially improve the environmental performance of the project.	Observation No. 76 BHOP to consider if there is a blanket procedure that would satisfy paragraph (f) of this condition across all Environmental Management Plans.	30 September 2022
	PA 07_0018 Sch4 Cond4	Environmental Management – Revision of Strategies, Plans & Programs Within three months of: (a) the submission of an annual review under Condition 3 above; (b) the submission of an incident report under Condition 5 below; (c) the submission of an audit report under Condition 7 below, or (d) any modification of the conditions of this approval (unless the conditions require otherwise), the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary. <i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and</i>	Observation No. 77 On the cover or second page of each strategy, plan and program required under this Project Approval, BHOP could insert a 'Review Table' or 'Document History Table' which includes the following details: a) date of review; b) name of reviewer; c) outcome of the review (i.e. 'revisions required' or 'no revisions required'); and d) in the case of revisions being required, the date of submission of the relevant revised document to the Secretary (having regard to the amended wording of this condition in the consolidated Project Approval as modified on 16 March 2022 by Mod 6).	Observation No. 77 BHOP to implement document history on future reviews of management plans and strategies.	On going



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Item No.	Condition	Requirement	Observations	Action	Date Required
		<i>incorporate any recommended measures to improve the environmental performance of the project.</i>			
	PA 07_0018 Sch4 Cond5	Reporting – Incident Notification, Reporting and Response The Secretary must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the project (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5.	Observation No. 78 BHOP could consider Appendix 5 of the Project Approval and develop an incident reporting form template for external regulators, which could be attached as an appendix to the Pollution Incident Response Management Plan.	Observation No. 78 BHOP to develop an incident reporting form template for external regulators.	30 September 2022
	PA 07_0018 Sch4 Cond5A	Reporting – Non-Compliance Notification The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance. A non-compliance notification must identify the project and the application number for it, set out the condition of approval that the project is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. Note: A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.	Observation No. 79 In all notifications to the DPE under this condition, BHOP should as required by this condition, set out the condition of the Project Approval which the project was not compliant with.	Observation No. 79 BHOP to highlight which conditions of the Project Approval the project was not compliant with when making notifications to the DPE.	On going
	PA 07_0018 Sch4 Cond5A	Reporting – Non-Compliance Notification	Observation No. 80	Observation No. 80	30 September 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
		The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance. A non-compliance notification must identify the project and the application number for it, set out the condition of approval that the project is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. Note: A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.	BHOP could develop an incident and non-compliance reporting procedure which defines the reporting workflow and potentially provides examples of the 'incidents' and 'non-compliances' as defined in the Project Approval.	BHOP to consider the value in developing an incident and non-compliance reporting procedure.	
	PA 07_0018 Sch4 Cond5A	Reporting – Non-Compliance Notification The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance. A non-compliance notification must identify the project and the application number for it, set out the condition of approval that the project is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. Note: A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.	Observation No. 81 BHOP should review its INX InControl system to verify if separate fields exist for 'incident' and 'non-compliance', which are separately identified in Project Approval, Schedule 4, conditions 5 and 5A.	Observation No. 81 BHOP to amend INX InControl fields to separate incidents and non-compliances.	31 July 2022
	PA 07_0018 Sch4 Cond5A	Reporting – Non-Compliance Notification The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance. A non-compliance notification must identify the	Observation No. 82 BHOP should notify the DPE in accordance with Project Approval Schedule 4, condition 5A, within seven days of becoming aware of any exceedance in blasting limits for Block 7 production blasts.	Observation No. 82 Blasting in Block 7 is currently in compliance; issue was reported in AEMR and Annual Review. To be actioned if required in the future.	N/a



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Item No.	Condition	Requirement	Observations	Action	Date Required
		project and the application number for it, set out the condition of approval that the project is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. Note: A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.			
	PA 07_0018 Sch4 Cond6	Reporting – Regular Reporting The Proponent shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any approved plans or programs of the conditions of this approval.	Observation No. 83 The CBH website could be updated to include the December 2020 “Human Health Risk Assessment for Rasp Mine, Mod 6” (SLR ref: 640.12028-R01-v3.0, dated 14 December 2020).	Observation No. 83 BHOP to consider adding the 2020 HHRA to the website.	Complete
	PA 07_0018 Sch4 Cond9	Access to Information From the end of March 2011, the Proponent shall: <ul style="list-style-type: none"> (a) make copies of the following publicly available on its website: <ul style="list-style-type: none"> • the documents referred to in Condition 2 of Schedule 2; • all current statutory approvals for the project; • all approved strategies, plans and programs required under the conditions of this approval; • the monitoring results of the project, reported in accordance with the specifications in any conditions of this approval, or any approved plans or programs; • a complaints register, updated on a 	Observation No. 84 Although CML7 is available on the CBH website by virtue of being included as Annexure C to the Rasp Mine Environmental Assessment Report (July 2010) and as Appendix B to the MOD 4 EA, for ease of access, CML7 could be made available as a separately defined document on the CBH website.	Observation No. 84 BHOP to consider the value added by having CML7 available on the website as a separate document.	31 July 2022



Item No.	Condition	Requirement	Observations	Action	Date Required
		<p>monthly basis;</p> <ul style="list-style-type: none"> the annual reviews of the project; any independent environmental audit of the project, and the Proponent's response to the recommendations in any audit; and any other matter required by the Secretary; <p>(b) keep this information up-to-date, to the satisfaction of the Secretary.</p>			
	PA 07_0018 Sch4 Cond9	<p>Access to Information</p> <p>From the end of March 2011, the Proponent shall:</p> <p>(a) make copies of the following publicly available on its website:</p> <ul style="list-style-type: none"> the documents referred to in Condition 2 of Schedule 2; all current statutory approvals for the project; all approved strategies, plans and programs required under the conditions of this approval; the monitoring results of the project, reported in accordance with the specifications in any conditions of this approval, or any approved plans or programs; a complaints register, updated on a monthly basis; the annual reviews of the project; any independent environmental audit of the project, and the Proponent's response to the recommendations in any audit; and any other matter required by the Secretary; <p>(b) keep this information up-to-date, to the satisfaction of the Secretary.</p>	<p>Observation No. 85</p> <p>The next revision of the Noise Monitoring Management Plan could include relevant 'Project Approval' related information in the Blasting Monitoring Program Management Plan (BMPMP) and Technical Blasting Management Plan (TBMP). The BMPMP and TBMP would then not have to be available on the CBH website.</p>	<p>Observation No. 85</p> <p>BHOP to consider including excerpts from the TBMP in the Noise Monitoring Management Plan to reduce number of documents required on the website.</p>	31 July 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
	EPL 12559 Cond A4.2	<p>Information supplied to the EPA</p> <p>For the purposes of condition A3.1 the licence application includes: <i>[Auditor's Note: incorrect cross-reference.]</i></p> <p>1) The Project Approval issued by the Department of Planning and Infrastructure on 31 January 2011;</p> <p>2) The Project Approval modification titled "Rasp Mine Mod 1" issued by the Department of Planning and Infrastructure issued on 16 March 2012;</p> <p>3) The Environmental Assessment titled "Final Report - Rasp Mine" dated July 2010;</p> <p>4) The Environmental Assessment titled "Rasp Mine - Preferred Project Report" dated September 2010;</p> <p>5) Broken Hill Operations Pty Ltd Rasp Mine "Noise and Blast Management Plan" submitted to the EPA on the 14 October 2011.</p> <p>6) The Environmental Assessment titled "Rasp Mine - Relocation of Ventilation Shaft" dated November 2011;</p> <p>7) The Broken Hill Operations Pty Ltd Rasp Mine "Air Quality Management Plan" submitted to the EPA in March 2011;</p> <p>8) The Broken Hill Operations Pty Ltd Rasp Mine "Site Water Management Plan" dated 20 March 2012 and;</p> <p>9) The Broken Hill Operations Pty Ltd Rasp Mine "Construction and Operations Manual for Tailing Storage in Blackwood Pit" submitted to the EPA in April 2012.</p>	<p>Observation No. 86</p> <p>Ideally, BHOP should submit the TSF2 "Operation, Maintenance and Surveillance Manual" (Doc ID: BHO-MAN-MET-029, Golder Associates, V1, issued on 15 June 2020) to the EPA, even though paragraph 9) of this condition is out of date. Other updated documents could be submitted on the EPA's request. Alternatively, BHOP could request this condition to be updated or removed from the EPL.</p>	<p>Observation No. 86</p> <p>BHOP to consider submission of the most recent version of the TSF2 Operation, Maintenance and Surveillance Manual to the EPA.</p>	31 July 2022
	EPL 12559 Cond P1.1	<p>Location of monitoring/discharge points and areas</p> <p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p>	<p>Observation No. 87</p> <p>BHOP should review the EPL monitoring point labels in the table in this condition against the HVAS units in the field. EPL monitoring point 12 (TSP-HVAS2) in the table is labelled by BHOP in the field (see above photo) as EPL</p>	<p>Observation No. 87</p> <p>BHOP to audit EPL monitoring point labels across site.</p>	Complete



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Item No.	Condition	Requirement	Observations	Action	Date Required
			monitoring point 13. EPL monitoring point 57 (TSP-HVAS) in the table is identified by BHOP in the field as TSP-HVAS3.		
	EPL 12559 Cond P1.3	Location of monitoring/discharge points and areas The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.	Observation No. 88 BHOP could consider installing locks on all groundwater monitoring bores (especially those which are located outside the CML7 boundary fence) to prevent the risk of groundwater sample contamination from unauthorised access to those bores.	Observation No. 88 BHOP to install locks on groundwater monitoring bores located outside the boundary fence where possible.	Complete
	EPL 12559 Cond P1.4	Location of monitoring/discharge points and areas The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.	Observation No. 89 With the next scheduled variation/update of the EPL, the “location description” (i.e. EPA Identification No. 55) for the meteorological station commissioned in January 2019 could be defined in the table in this condition.	Observation No. 89 BHOP to request variation in EPL to include accurate location description for the meteorological station.	31 July 2022
	EPL 12559 Cond L4.3	Noise Limits Noise from the premises is to be measured at the most affected point within the boundary of the nominated premises, or at the most affected point within 30 metres of a dwelling where the dwelling is more than 30 metres from the boundary, to determine compliance with the noise level limits in Condition L4.2 unless otherwise stated. Where it can be demonstrated that direct measurement of noise from the premises is impractical, the EPA may accept alternative means of determining compliance. See Chapter 11 of the NSW Industrial Noise Policy. The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.	Observation No. 90 BHOP could review the October 2017 NSW EPA Noise Policy for Industry (or discuss with the consultant, EMM) to verify whether: a) the Noise Policy for Industry requires an alternate noise monitoring survey regime to be adopted; and b) whether the Policy defines that only night time noise survey monitoring is required to be conducted by the relevant industrial sites to which the Policy applies.	Observation No. 90 BHOP to discuss with EMM prior to next scheduled noise monitoring event, requirements of the Noise Policy for Industry.	30 September 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
	EPL 12559 Cond L6.1	Hours of Operation Standard construction hours Unless otherwise specified by any other condition of this licence, all construction activities are: a) restricted to between the hours of 7:00am and 6:00pm Monday to Friday; b) restricted to between the hours of 8:00am and 1:00pm Saturday; and c) not to be undertaken on Sundays or Public Holidays.	Observation No. 91 BHOP could ensure that these construction hours are formally included in the general (employees and contractors) induction for Mod 6 works, to enable all construction personnel to be fully aware of these conditions.	Observation No. 91 BHOP to review induction and similar construction specific briefings will be reviewed to ensure they address construction hours.	31 July 2022
	EPL 12559 Cond L8.1	Other limit conditions All storm water and other surface water holding ponds identified in the Site Water Management Plan must be designed, constructed and maintained to accommodate the stormwater runoff generated in a 100 year (24 hour) Average Recurrence Interval rain event.	Observation No. 92 BHOP could request Golder Associates to survey and confirm the capacity of all water storage facilities listed in Table 6 of the Site Water Management Plan, to verify that these facilities meet the required 1 in 100 year ARI design capacity. As of March 2022, information regarding design capacity is not consistently included in the Site Water Management Plan.	Observation No. 92 BHOP to engage Golder Associates to survey and confirm capacity of all water storage facilities listed in Table 6 of the SWMP.	31 December 2022
	EPL 12559 Cond O1.1	Activities must be carried out in a competent manner Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Observation No. 93 For the purpose of identifying environment risk associated with potential concentrate spillage during off-site transportation, BHOP could verify/continue to monitor the exact location when BHOP ceases to have responsibility for concentrate which is transported off-site (i.e. potentially referencing this in the conditions of carriage or customer contracts).	Observation No. 93 BHOP to monitor location of concentrate which has been transported off-site.	31 October 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
	EPL 12559 Cond O2.1	Maintenance of plant and equipment All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Observation No. 94 Training sessions in key environmental obligations under the EPL (and Project Approval and CML7) may be beneficial for key BHOP operational personnel (e.g. Control Room operators) to ensure that these personnel understand the environmental obligations applicable to the operation (i.e. to facilitate correct decision making).	Observation No. 94 BHOP to consider implementing training in relation to key environmental obligations under the EPL for key operational personnel.	31 August 2022
	EPL 12559 Cond O3.3	Dust Visible dust emissions from any tailings storage facility must be immediately suppressed by water or chemical application.	Observation No. 95 BHOP could review section 7.1.6 in the TSF2 Operation, Maintenance and Surveillance Manual (15 June 2020) to ensure that the expressed commitments (e.g. at least hourly monitoring during dust suppression system operation) are feasible and achievable in daily operations.	Observation No. 95 BHOP to investigate commitments in TSF2 Operation, Maintenance and Surveillance Manual are feasible and achievable.	31 August 2022
	EPL 12559 Cond O3.3	Dust Visible dust emissions from any tailings storage facility must be immediately suppressed by water or chemical application.	Observation No. 96 The Daily Inspection Checklist (Doc ID: BHO-CKL-MET-022, issued on 25 January 2020) could be revised and updated to include a line item for completion by the BHOP employee, to confirm whether or not visible dust was being emitted from the surface of TSF2 at the time of inspection of TSF2.	Observation No. 96 BHOP to revise Daily Inspection Checklist (BHO-CKL-MET-022) to include a check for whether dust was visible being emitted from the TSF2 surface.	31 August 2022
	EPL 12559 Cond O3.4	Dust Crushing of extracted material must only occur inside the crusher enclosure.	Observation No. 97 In the event that a mobile crusher is required to be used for the Mod 6 works, BHOP could consider either: a) applying to vary this EPL condition; or b) securing formal written approval from the EPA to use a mobile crusher for the Mod 6 works.	Observation No. 97 BHOP to seek a variation in the EPL.	31 July 2022
	EPL 12559 Cond O4.1	Process and management	Observation No. 98	Observation No. 98	31 October 2022 and annually



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Item No.	Condition	Requirement	Observations	Action	Date Required
		All surface water storage ponds must be maintained to ensure that sedimentation does not reduce their capacity by more than 10% of the design capacity.	BHOP could consider developing and implementing an annual pre-summer inspection checklist and clean-up to ensure that all stormwater drainage channels, sediment control facilities etc. are fully functional prior to forecasted major rain events. The demonstrated completion of a formal inspection with the use of a checklist and preventative maintenance schedule would be beneficial if a major rain event resulted in the overtopping and release from any on-site water storages.	BHOP to develop an annual checklist and clean out schedule for all stormwater drainage channels, sediment control facilities etc.	thereafter
	EPL 12559 Cond O4.1	Process and management All surface water storage ponds must be maintained to ensure that sedimentation does not reduce their capacity by more than 10% of the design capacity.	Observation No. 99 BHOP is encouraged to survey all on-site stormwater retention storages to determine the actual storage volumes of each facility. Information determined by Golder Associates within the Site Water Management Plan dated 30 April 2012 and referred to in the BHOP Site Water Management Plan issued on 25 June 2019, is limited to the area of each water storage facility (i.e. in m2) and the runoff volumes within each catchment, not the actual available storage volume (i.e. in m3) within each facility.	Observation No. 99 BHOP to consider surveying stormwater retention ponds in next review of SWMP.	31 December 2022
	EPL 12559 Cond M1.1	Monitoring records The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Observation No. 100 BHOP could confer with ALS to obtain laboratory report data in CSV or another data format which would enable uploading/converting into Excel via a suitable third party software platform to be purchased by BHOP.	Observation No. 100 BHOP to investigate if possible to get lab reports as CSV files.	Complete
	EPL 12559 Cond M1.1	Monitoring records The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Observation No. 101 BHOP could consider loading field data into a tablet (using INX InForm) instead of hard copy, to reduce the risk of loss of data on hard copy field sheets.	Observation No. 101 BHOP to investigate the use of electronic field sheets.	31 December 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
	EPL 12559 Cond M1.1	Monitoring records All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Observation No. 102 As of March 2022, no compliance database (or equivalent) is being utilised to enable BHOP to be proactively and consistently notified of required statutory renewals, reporting obligations, fee payments and other relevant compliance obligations.	Observation No. 102 BHOP to implement a compliance database.	31 December 2022
	EPL 12559 Cond M1.1	Monitoring records All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Observation No. 103 BHOP is encouraged to purchase a formal environmental database and discontinue the use of multiple spreadsheets for the retention of environmental monitoring data and records. Once purchased, BHOP could request ALS to submit this data as electronic CSV files for uploading into the database.	Observation No. 103 BHOP will purchase an environmental database for all monitoring data.	31 December 2022
	EPL 12559 Cond M2.1	Requirement to monitor concentration of pollutants discharged For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Observation No. 104 BHOP's Site Water Monitoring Procedure (BHO-ENV-PRO-011) should be reviewed and updated with suitable document control applied.	Observation No. 104 Document control to be revised across all Management Plans.	31 July 2022



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	EPL 12559 Cond M2.1	Requirement to monitor concentration of pollutants discharged Water and/ or Land Monitoring Requirements	Observation No. 105 In section 3.1 of the Environmental Monitoring Report for the 2020 Annual Return (reporting period from 2 November 2019 to 1 November 2020), BHOP could check for a possible date transcription error in the results tables for Shaft 7 (EPL53) and Kintore Pit (EPL54). Each of these tables shows two rows with a date of 2/03/2020 with different results in each row, and each of these tables does not include a date in April 2020.	Observation No. 105 BHOP to investigate the discrepancy in the Environmental Monitoring Report for the 2020 Annual Return.	31 December 2022
	EPL 12559 Cond M3.1	Testing methods – concentration limits Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. <i>Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</i>	Observation No. 106 BHOP could confirm and secure evidence from the ALS/ACTest Newcastle Coal Testing Laboratory that: a) TSP; b) PM10; and c) lead dust, is included within this laboratory's current scope of NATA Accreditation.	Observation No. 106 BHOP will confirm the NATA Accreditation of the ALS Newcastle Coal Testing Laboratory.	30 August 2022
	EPL 12559 Cond M3.2	Testing methods – concentration limits	Observation No. 107	Observation No. 107	31 July 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
		Analysis of heavy metals in air samples required by this licence must be done in accordance with: (a) APHA 3030 for the preparation of the sample; and (b) APHA 3111B for the measurement of lead.	BHOP could request the EPA to vary this condition to refer to equivalent USEPA methods, as APHA methods are not being used by service provider, Envirolab Services (i.e. Envirolab Services defines in its laboratory reports that USEPA methods are being utilised for the analysis of heavy metals in air samples).	BHOP to investigate a variation in the EPL to USEPA method equivalents, as are the methods used by Envirolab.	
	EPL 12559 Cond M4.1	Weather monitoring At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.	Observation No. 108 In BHOP's Monthly Environment Monitoring Report for June 2021 (viewed as an example during this March 2022 audit), the "Weather Data Summary for June 2021" table incorrectly refers to dates in June 2018.	Observation No. 108 June 2021 Monthly Environment Monitoring Report to be amended.	Complete
	EPL 12559 Cond M5.2	Recording of pollution complaints The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Observation No. 109 BHOP could consider modifying INX InControl to create separate fields for recording: • any personal details of the complainant or a note that no personal details were provided (paragraph c)); and • information stating that if no action was taken by the licensee, the reasons why no action was taken (paragraph f)).	Observation No. 109 BHOP to investigate possible alterations to INX complaints form.	31 July 2022
	EPL 12559 Cond M6.1	Telephone complaints line The licensee must operate during its operating hours a telephone complaints line for the purpose of	Observation No. 110 BHOP should reconsider the current practice (adopted in 2018) of locating the dedicated phone for the receipt of	Observation No. 110 BHOP to consider relocating the complaints line phone.	31 August 2022



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		receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	community complaints on the Senior Environmental Advisor's desk, which is unmanned at night and over the weekend (i.e. the phone is answered by an answering machine). This practice could potentially increase caller frustration, and result in an increased number of complaints made directly to the EPA or media.		
	EPL 12559 Cond M6.2	Telephone complaints line The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Observation No. 111 BHOP is encouraged to define in INX InControl if an external complaint was received directly by BHOP or indirectly via the EPA.	Observation No. 111 INX InControl to be updated to record whether complaints were received internally or externally.	31 July 2022
	EPL 12559 Cond R1.9	Blast monitoring reporting The licensee must supply a Blast Management Report quarterly.	Observation No. 112 In section 4 of each Quarterly Blast Report (which corresponds with paragraph c) of this condition), BHOP could include a comment that blast data for the reporting period is presented in the blast data table within the report.	Observation No. 112 BHOP to include reference to blast data table in section 4 of the Quarterly Blast Report.	31 July 2022 and quarterly thereafter
	EPL 12559 Cond R3.3	Written report The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the	Observation No. 113 BHOP could consider updating INX InControl to receive and capture the information defined in EPL condition R3.3 a) – g) (for example, any witnesses to an incident, in paragraph c))	Observation No. 113 Altering the INX entry fields for events covered by this condition to be considered.	31 July 2022



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		licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.			
	EPL 12559 Cond G1.1	Copy of licence kept at the premises or plant A copy of this licence must be kept at the premises to which the licence applies.	Observation No. 114 BHOP could consider keeping a hard copy of the current version of the EPL in the Mill Control Room for ease of access by personnel.	Observation No. 114 BHOP to investigate a hard copy of the EPL could be put in the Mill Control Room or if it could be made accessible on the company intranet.	31 July 2022
	EPL 12559 Cond E1.1	Concrete Batching Plant construction The licensee must construct the Concrete Batching Plant (CBP) consistent with the Construction Environment Management Plan (BHO-PLN-ENV-011) dated December 2017 and kept on EPA file DOC17/609105-02.	Observation No. 115 BHOP could consider conducting an internal audit against approved Construction Environmental Management Plans applicable to works under Mod 6. BHOP is encouraged to commence the internal audit during construction of Mod 6 works, using the February 2020 CEMP-CBP audit report and February 2020 compliance table as a template.	Observation No. 115 BHOP to conduct internal audits against the Construction Environmental Management Plan during MOD6 works.	31 October 2022
	EPL 12559 Cond E1.1	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 of the Department of Primary Industries – Mineral Resources.	Observation No. 116 BHOP could consider defining on the cover page of the MOP the approval status of the MOP (i.e. 'draft' or 'approved').	Observation No. 116 MOP document title page to include approval status.	31 July 2022



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	CML7 Cond2	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 of the Department of Primary Industries – Mineral Resources.	Observation No. 117 In relation to the sixth dot point in paragraph (b) of this condition, when preparing a new or amended MOP or Rehabilitation Management Plan, BHOP could have regard to relevant updated environmental guidelines adopted by the Resources Regulator (e.g. in relation to rehabilitation) and reference any relevant guideline.	Observation No. 117 Noted.	N/a
	CML7 Cond3	Reporting (a) The lease holder must lodge Environmental Management Reports (EMR) with the Director-General annually or at dates otherwise directed by the Director-General. (b) The EMR must: - report against compliance with the MOP; - report on progress in respect of rehabilitation completion criteria; - report on the extent of compliance with regulatory requirements; and - have regard to any relevant guidelines adopted by the Director-General; Additional environmental reports may be required on specific surface disturbing operations or environmental incidents from time to time as directed in writing by the Director-General and must be lodged as instructed.	Observation No. 118 BHOP could include a section in its Annual Environmental Management Reports to state whether BHOP has complied with the relevant conditions of CML7, MPL183, MPL184, MPL185 and MPL186, during the reporting period.	Observation No. 118 BHOP will consider including compliance to conditions in mining leases during the reporting period in its Annual Environmental Management Reports.	1 March 2023
	CML7 Cond12	Safety Operations must be carried out in a manner that ensures the safety of persons or stock in the vicinity of the operations. All drill holes shafts and excavations must be appropriately protected, to the satisfaction of the Director-General, to ensure that access to them by persons and stock is restricted. Abandoned shafts and excavations opened up or	Observation No. 119 Two abandoned shafts (one each at the BHP Pit and Kintore Pit) are currently protected by posts and chains instead of fences. For additional safety and security, BHOP could consider erecting fences around these abandoned shafts.	Observation No. 119 BHOP to investigate fencing abandoned shafts in BHP Pit and Kintore Pit.	31 August 2022



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		used by the lease holder must be filled in or otherwise rendered safe to a standard acceptable to the Director-General.			
	CML7 Cond12	Safety Operations must be carried out in a manner that ensures the safety of persons or stock in the vicinity of the operations. All drill holes shafts and excavations must be appropriately protected, to the satisfaction of the Director-General, to ensure that access to them by persons and stock is restricted. Abandoned shafts and excavations opened up or used by the lease holder must be filled in or otherwise rendered safe to a standard acceptable to the Director-General.	Observation No. 120 BHOP could consider inclusion of the S49 Ryan Street Dam on the inspection checklist.	Observation No. 120 S49 to be added to inspection checklist.	31 August 2022
	CML7 Cond13	Rehabilitation Disturbed land must be rehabilitated to a sustainable/agreed end land use to the satisfaction of the Director-General.	Observation No. 121 BHOP could consider the legal effect of this condition regarding whether the words, “disturbed land” mean: <ul style="list-style-type: none"> • land which only BHOP has disturbed, or • land which BHOP and previous lessees have disturbed. 	Observation No. 121 BHOP to consider confirming the definition of this term.	30 September 2022
	CML7 Cond26	Special Conditions – General In respect of the area shown on Catalogued Plan No M8388 the registered holder shall not conduct any mining operations other than diamond drilling between the depths of 15.24 metres and 76 metres below the surface unless with the consent of the Minister first and subject to such conditions as may be stipulated.	Observation No. 122 The reference in this Condition to Catalogued Plan Number M8388 seems to be incorrect. Schedule 2 of CML7 refers to plan M18388. BHOP could clarify the correct reference with the appropriate government agency.	Observation No. 122 BHOP to investigate confirming the correct Catalogued Plan No.	30 September 2022



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Item No.	Condition	Requirement	Observations	Action	Date Required
	CML7 Cond32	Special Conditions – General The registered holder shall as far as may be practicable so conduct operations as not to interfere in any way with the public use and enjoyment of Reserve No 2421 for Temporary Common; Reserve No 69262 from Sale for future Public Requirements, Reserve No 3073 from Sale for Public Recreation and Reserve No 30905 for Quarry.	Observation No. 123 BHOP could contact the appropriate government agency to confirm the locations of these named Reserve areas.	Observation No. 123 BHOP to confirm locations of the Reserve areas in this condition.	30 September 2022