



Bass Point Quarry

Action Plan 2020

Issue No.	Condition	Requirement	Issue sighted	Hanson response	Due date												
NC-01	Schedule 2, Condition 2	<p>The Proponent must carry out the project:</p> <p>(a) generally in accordance with the EA, EA (MOD 1), EA (MOD 2) and the project layout; and</p> <p>(b) in accordance with the statement of commitments and the conditions of this approval.</p>	<p>Eight non-compliance were raised where compliance with the conditions of consent was not demonstrated.</p>	<p>The Auditor’s recommendation is that “Hanson should ensure that appropriate processes are developed and implemented to ensure compliance with the requirements of the conditions of consent.” Hanson at the Bass Point Quarry aim for continuous improvement of processes related to compliance matters, including compliance with the conditions of consent.</p> <p>This ongoing refinement of processes occurs following any non-compliances (as detailed during the reporting process), but more importantly, it occurs on a proactive basis.</p> <p>Hanson’s commitment to ongoing compliance with the conditions of consent is demonstrated in the appointment of a permanent full-time Compliance Officer in 2019.</p>	Ongoing.												
NC-02	Schedule 2, Condition 8	<p>The Proponent must limit the dispatch of trucks carrying quarry products or concrete from the site to the levels shown in Table 1.</p> <ul style="list-style-type: none"> Table 1: Laden Truck Dispatch Hours <table border="1" data-bbox="465 962 878 1366"> <thead> <tr> <th data-bbox="465 962 680 1018">Period</th> <th data-bbox="680 962 878 1018">Maximum laden truck despatch</th> </tr> </thead> <tbody> <tr> <td data-bbox="465 1018 680 1050">7 am – 10 pm</td> <td data-bbox="680 1018 878 1050">40 in any hour</td> </tr> <tr> <td data-bbox="465 1050 680 1082">10 pm – 7 am</td> <td data-bbox="680 1050 878 1082">23 in any hour</td> </tr> <tr> <td data-bbox="465 1082 680 1198">5 am – 6 am (Monday to Friday only and excluding Public Holidays)</td> <td data-bbox="680 1082 878 1198">27</td> </tr> <tr> <td data-bbox="465 1198 680 1315">6 am – 7am (Monday to Friday only and excluding Public Holidays)</td> <td data-bbox="680 1198 878 1315">38</td> </tr> <tr> <td data-bbox="465 1315 680 1366">24-hour period on any day</td> <td data-bbox="680 1315 878 1366">500</td> </tr> </tbody> </table>	Period	Maximum laden truck despatch	7 am – 10 pm	40 in any hour	10 pm – 7 am	23 in any hour	5 am – 6 am (Monday to Friday only and excluding Public Holidays)	27	6 am – 7am (Monday to Friday only and excluding Public Holidays)	38	24-hour period on any day	500	<p>Transport data from the 2019 annual review show 3 exceedances in 2019:</p> <ul style="list-style-type: none"> 9/02/2019 – 28 trucks despatched between 5.00am and 6.00am (23 permitted). 22/03/2019 - 28 trucks despatched between 5.00am and 6.00am (27 permitted). 2/05/2019 - 28 trucks despatched between 5.00am and 6.00am (27 permitted). 	<p>This issue has now been rectified within the weighbridge with the SAP system (weighbridge operating system) now locking out operators once the movement limit has been reached. No further exceedances have occurred since the implementation of this software change.</p>	None required.
Period	Maximum laden truck despatch																
7 am – 10 pm	40 in any hour																
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NC-03	Schedule 3, Condition 6	<p>The Proponent must prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with the EPA, and submitted to the Secretary for approval by 31 May 2014;</p> <p>(b) describe the measures that would be implemented to ensure:</p> <ul style="list-style-type: none"> – best management practice is being employed to minimise the construction, operational and transport noise of the project; – the noise impacts of the project are minimised during any meteorological conditions when the noise limits in this approval do not apply; and – compliance with the relevant conditions of this approval; <p>(c) describe the proposed noise management system in detail; and</p> <p>(d) include a monitoring program that:</p> <ul style="list-style-type: none"> – is capable of regularly evaluating the performance of the project, including noisy individual items of plant, such as haulage trucks, crushers and bulldozers; – includes a protocol for determining any exceedances of the relevant conditions in this approval at locations listed in Table 2; and – evaluates and reports on the effectiveness of the noise management system on site. <p>The Proponent must implement the approved management plan as approved from time to time by the Secretary.</p>	<p>It was noted in the previous report that the Noise Management Plan required the operator shall quantify and characterise the overall levels of ambient noise (i.e. L_{Amax}, L_{A1}, L_{A10}, L_{A50}, L_{A90}, L_{A99}, L_{Amin}) over the 15 minute measurement interval. While the consultant had been requested to include the required information, noise reports do not show that the noise monitoring variables had been quantified and characterised.</p>	<p>Hanson requested on 30/09/2020 that the acoustical consultant include the additional ambient noise parameters within the scope of future noise monitoring if this is not already the case.</p> <p>Hanson also requested that monitoring of these parameters be acknowledged within future noise monitoring reports.</p>	<p>31/12/2020 (next noise monitoring is due to be completed in December 2020, exact date not yet confirmed)</p>
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NC-04	Schedule 3, Condition 14	<p>The Proponent must prepare and implement a Blast 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 EPA, and be submitted to the Secretary for approval by 31 May 2014; (b) describe the measures that would be implemented to ensure: <ul style="list-style-type: none"> · best management practice is being employed; and · compliance with the relevant conditions of this approval; (c) include a specific blast fume management protocol to demonstrate how emissions will be minimised, including risk management strategies if blast fumes are generated; and (d) include a monitoring program for evaluating the performance of the project including: <ul style="list-style-type: none"> · compliance with the applicable criteria; and · minimising fume emissions from the site. <p>The Proponent must implement the approved management plan as approved from time to time by the Secretary.</p>	<p>No monitoring records were available for the blast event which occurred on 14/02/2020. Reported as a non-compliance to DPIE and EPA 14/02/2020.</p>	<p>The Auditor’s recommendation was that “Hanson should ensure that monitoring of all blast events is conducted in accordance with Schedule 3, Condition 14”. Hanson endeavour to undertake blasting activities in accordance with industry best practice and in accordance with the relevant conditions of consent.</p> <p>All the control measures reported to DPIE in the detailed incident report have been implemented by Hanson. All blast events since 14/02/2020 have been appropriately monitored and records maintained accordingly.</p>	Ongoing.
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NC-05	Schedule 3, Condition 14	The Proponent must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not exceed the criteria in Tables 4 to 6 at any residence on privately-owned land.	<p>Deposited dust at DDG2 has consistently exceeded the Maximum total deposited dust level of 4g/m²/mth.</p> <p>Investigations by the Quarry have determined that deposited dust levels at DDG2 were impacted by the earthworks being conducted for the adjacent marina development.</p> <p>While particulate matter (PM₁₀) exceedances had been recorded for monitoring at location PM10-2, site investigations attributed the exceedances to off-site impacts and the close proximity of the monitoring location to the site.</p>	Hanson will undertake a review of controls for managing dust emissions from site to ensure that all feasible measures are implemented, as per the Auditor's recommendation. As part of this review, the Air Quality Management Plan will be reviewed, and revised as required.	28 January 2021
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NC-06	Schedule 3, Condition 16	<p>The Proponent must prepare and implement an Air Quality Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with the EPA, and submitted to the Secretary for approval by 31 May 2014;</p> <p>(b) describe the measures that would be implemented to ensure:</p> <ul style="list-style-type: none"> · best management practice is employed; · the air quality impacts of the project are minimised during adverse meteorological conditions and extraordinary events; and · compliance with the relevant conditions of this approval; <p>(c) describe the proposed air quality management system based on the preparation of a site-specific best management practice determination and reactive dust management strategy; and</p> <p>(d) include an air quality monitoring program that:</p> <ul style="list-style-type: none"> · is capable of evaluating the performance of the project; · includes a protocol for determining any exceedances of the relevant conditions of approval; · adequately supports the air quality management system; and · evaluates and reports on the adequacy of the air quality management system. <p>The Proponent must implement the approved management plan as approved from time to time by the Secretary.</p>	<p>Monitoring of PM₁₀ had not been conducted in accordance with Section 7.4 of the AQMP.</p> <p>LVAS sampling PM₁₀ monitoring data was not available for the periods 5 February 2019 to 9 August 2019, 23 November 2019 to 18 December 2019, and 16 February 2020 to 18 April 2020 due to equipment malfunction.</p>	<p>Ongoing maintenance of air quality monitors will require a back-up unit to be utilised at all times. If further malfunctioning of air quality monitors do occur, which results in a period where no data has been collected, the DPIE will be notified of the incident.</p>	Ongoing.
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NC-07	Schedule 3, Condition 19 EPL Condition L1 EPL Condition L2	Unless an EPL or the EPA authorises otherwise, the Proponent must ensure that all surface water discharges from the site comply with section 120 of the POEO Act.	A breach in the capacity of two sediment basins due to exceptional rainfall from Friday 7th to Sunday 9th February 2020 resulted in discharge from DP2 and DP3 which did not comply with the discharge limits in the EPL (high Total Suspended Solids).	An EPL variation was finalised on 18 June 2020. The variation included provisions for discharges during periods of exceptional rainfall, as was recommended by the Auditor. The EPA have since advised that another EPL variation is necessary, so that there is greater clarity on discharges during periods of exceptional rainfall. Hanson will work cooperatively with the EPA in this regard to complete the EPL variation and ensure ongoing compliance with EPL conditions.	Ongoing.
NC-08	Schedule 3, Condition 40	The Proponent must prepare and implement a Landscape Management Plan for the project to the satisfaction of the Secretary. This plan must: e) include a detailed description of the measures that would be implemented, including the procedures to be implemented for: <ul style="list-style-type: none"> • controlling weeds and feral pests; 	Weed inspections had not been conducted in accordance with the Landscape Management Plan. No weed inspections had been conducted in 2019.	Since the Independent Environmental Audit Hanson have secured two different businesses to undertake complementary weed control activities on site. One business has already commenced weed control activities on site. The other business is due to commence weed control activities next month. These activities will continue, to ensure ongoing compliance with the Landscape Management Plan.	Ongoing.
NC-09	Schedule 3, Condition 41	Within 6 months of the approval of the Landscape Management Plan, the Proponent must lodge a Conservation and Rehabilitation Bond with the Department to ensure that the rehabilitation of the site is implemented in accordance with the performance and completion criteria set out in the Landscape Management Plan. The sum of the bond must be determined by: (a) calculating the cost of rehabilitating the site; and (b) employing a suitably qualified quantity surveyor or other expert to verify the calculated costs, to the satisfaction of the Secretary.	Landscape and Rehabilitation Management Plan approved 16/03/2018. Conservation and Rehabilitation Bond not lodged within 6 months of approval of the plan. Due before 16/09/18. Lodgement confirmed by DPIE 16/10/18.	No further action is required.	None required.

NC-10	Schedule 5, Condition 2	<p>The Proponent must assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this approval and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation.</p> <p>Where any exceedance of these criteria and/or performance measures has occurred, the Proponent must, at the earliest opportunity:</p> <p>(a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur;</p> <p>(b) consider all reasonable and feasible options for remediation (where relevant);</p> <p>(c) within 14 days of the exceedance occurring, submit a report to the Secretary describing these remediation options and any preferred remediation measures or other course of action; and</p> <p>(d) implement remediation measures as directed by the Secretary;</p> <p>to the satisfaction of the Secretary.</p>	<p>No data was available from the LVAS for the period 4/02/2020 to 18/04/2020. Note that back up unit malfunctioned at same time, hence was not able to be used.</p> <p>Not reported as a non-compliance to DPIE.</p>	<p>Ongoing maintenance of air quality monitors will require a back-up unit to be utilised at all times. If further malfunctioning of air quality monitors do occur which results in a period where no data has been collected, the DPIE will be notified of the incident.</p>	Ongoing.
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NC-11	Schedule 5, Condition 5	<p>Within 3 months of:</p> <ul style="list-style-type: none"> (a) the submission of an annual review under condition 4 above; (b) the submission of an incident report under condition 7 below; (c) the submission of an audit report under condition 9 below; or (d) any modification to this approval (unless the conditions require otherwise), <p>the Proponent must review the strategies, plans, and programs required under this approval, to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval.</p> <p>The Proponent must notify the Department in writing of any such review being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary</p>	<p>Email to DPIE 3/07/18.</p> <p>No updates have occurred as a result of the annual review. No evidence provided to show the DPIE had been notified that a review of the management plans had been completed.</p> <p>No evidence of review of management plans following submission of the previous independent audit report.</p> <p>No evidence of review of the AQMP following air quality exceedances.</p>	<p>The update to management plans have been ongoing since the beginning of 2019. Hanson will strive to finalise the outstanding management plans by the end of January 2021.</p>	28 January 2021.
NC-12	Schedule 5, Condition 7	<p>The Proponent must immediately notify the Secretary (using the contact name, email address and phone number provided by the Department from time to time) and any other relevant agencies of any incident.</p>	<p>Water quality incident 10/02/2020.</p> <p>EPA notified 10/02/2020.</p> <p>DPIE were not notified until 14/02/2020.</p> <p>The site had not notified DPIE immediately upon becoming aware of the water quality exceedance.</p>	<p>EPA and DPIE will be notified concurrently on all incidents that occur at the site.</p>	Ongoing.

NC-13	EPL Condition M2.1 EPL Condition M2.2	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:	Records do not show that all required pollutants were monitored during the period covered by this report. Records of pH and total suspended solids were not always available for discharge from DP-1.								
NC-14	PL Condition A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1" data-bbox="468 791 875 1082"> <thead> <tr> <th data-bbox="468 791 674 823">Fee Based Activity</th> <th data-bbox="674 791 875 823">Scale</th> </tr> </thead> <tbody> <tr> <td data-bbox="468 823 674 938">Crushing, Grinding or separating</td> <td data-bbox="674 823 875 938">> 500000-2000000 T annual processing capacity</td> </tr> <tr> <td data-bbox="468 938 674 1082">Land-based extractive activity</td> <td data-bbox="674 938 875 1082">> 500000-2000000 T annual capacity to extract, process or store</td> </tr> </tbody> </table>	Fee Based Activity	Scale	Crushing, Grinding or separating	> 500000-2000000 T annual processing capacity	Land-based extractive activity	> 500000-2000000 T annual capacity to extract, process or store	<p>The annual production for the 2017-2018 reporting period exceeded the maximum quantity permitted in the EPL.</p> <p>Noted that the EPL was subsequently varied to align with the project approval limits.</p>	No further action is required.	None required.
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