

**Integra Underground  
Post Approval Review**



Document: Integra Underground Air Quality and Greenhouse Gas Management Plan

Revision: Version 5.1, Dated 26 July 2019 – 26 July 2022

Reviewed: Sarah Clibborn on 26 November 2020

<b><i>Integra Underground Air Quality and Greenhouse Gas Management Plan, condition 15, Schedule 3</i></b>	<b>Sufficient (Yes/No/Partial)</b>	<b>Document reference and comment</b>	<b>Action Required</b>	<b>Company Response</b>
The Proponent must prepare an Air Quality & Greenhouse Gas Management Plan for the project to the satisfaction of the Secretary. This plan must:				
(a) be prepared in consultation with EPA, and then submitted to the Secretary for approval;	Yes	<b>Section 1.4 and Appendix B.</b>	Consultation with EPA found in <b>Appendix A.</b> Please add reference accordingly.	Reference updated in Section 1.4
(b) describe the measures that would be implemented to ensure: <ul style="list-style-type: none"> <li>compliance with the air quality criteria and operating conditions of this approval; and</li> <li>best practice air quality management is being employed;</li> </ul>	Yes	<b>Section 3.1.</b> Some very minor grammatical errors in this section – “using a water carts”, “There is currently limited water sprays”	Amend if desired.	Suggested changes made in Section 3.1
(c) describe the air quality management system in detail;	Yes	<b>Section 3.1</b>	Nil	
(d) include an air quality monitoring program that:				
<ul style="list-style-type: none"> <li>uses a combination of real-time monitors and supplementary monitors to evaluate the performance of the project;</li> </ul>	No	<b>Section 4–</b> While there is a combination of real-time and supplementary monitors within the network, the removal of 6 out of 7 Deposited Dust gauges seems excessive. The	Please amend changes to monitoring	Integra Underground considers one depositional dust

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		<p>Department considers that one Deposited Dust Gauge is not adequate to evaluate the performance of the project.</p> <p>The Department acknowledges that there is potential duplication of results between IDG4, IDG5, IDG6 and IDG7. The Department also acknowledges that there is potential duplication of results between IDG1 and IDG2, and that IDG2 is more representative of sensitive receptors. The Department is supportive of the rationalisation of Integra UG's Deposited Dust Gauges to improve the efficiency of sample collection, however, strongly recommends that more than one Deposited Dust Gauge be retained.</p>	network accordingly.	<p>gauge to be adequate to meet the requirements of PA 08_0101. Notwithstanding, Integra Underground has taken the Department's review comments are presents a monitoring program that includes three gauges. The following have been updated to reflect this: Section 4.1, Figure 4, Table 4-1</p>
<ul style="list-style-type: none"> <li>includes a protocol for determining any exceedances of the relevant conditions of this approval;</li> </ul>	Yes	The protocol for determining and reporting exceedances is located in <b>Section 5.1.2</b> , not <b>Section 4</b> .	Please update reference in <b>Table 1-1</b> .	Table 1-1 updated
<ul style="list-style-type: none"> <li>adequately supports the proactive and reactive air quality management system;</li> </ul>	Yes	This information is located in <b>Section 3.1</b> , not <b>Section 4</b> .	Please update reference in <b>Table 1-1</b> .	Table 1-1 updated

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<ul style="list-style-type: none"> <li>includes PM<sub>2.5</sub> monitoring (although this obligation could be satisfied by the regional air quality monitoring network if sufficient justification is provided);</li> </ul>	Yes	<b>Section 4.1</b>	Nil	
<ul style="list-style-type: none"> <li>evaluates and reports on the effectiveness of the air quality management system and the best practice air quality management measures; and</li> </ul>	Yes	This information is found in <b>Section 5.1.1</b> , not <b>Section 4</b> .	Please update reference in <b>Table 1-1</b> .	Table 1-1 updated
(e) include a protocol that has been prepared in consultation with the owners of nearby mines (including Ashton, Rix's Creek North, Rix's Creek and the Mount Owen Complex) to minimise the cumulative air quality impacts of the mines.	Partial	<b>Section 1.4</b> – protocol referred to in this section, but detail not included. Noted that a combined CCC is operated and there are quarterly meetings with Ashton, Rix's Creek, Mt Owen and Glendell.	Please provide more information regarding the protocol and what actions are taken to minimise cumulative air quality impacts.	Added reference to Section 3.1.1 to Table 1-1
The Proponent must implement the approved management plan as approved from time to time by the Secretary.				
<b><i>Integra Underground Air Quality and Greenhouse Gas Management Plan, condition 10, Schedule 3</i></b>	<b>Sufficient (Yes/No/Partial)</b>	<b>Document reference and comment</b>	<b>Action Required</b>	<b>Company Response</b>
The Proponent must ensure that no offensive odours are emitted from the site, as defined under the POEO Act.		There is no information regarding this condition in <b>Table 3.1</b> as stated in <b>Table 1-1</b> , it is only stated that the Environment and Community Manager is the person responsible for minimising the use of odorous substances.	Please provide further information.	Included additional control measure in Table 3-1. Performance indicator in Table 2-4. Table 1-1 updated.

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<b><i>Integra Underground Air Quality and Greenhouse Gas Management Plan, condition 11, Schedule 3</i></b>	<b>Sufficient (Yes/No/Partial)</b>	<b>Document reference and comment</b>	<b>Action Required</b>	<b>Company Response</b>
The Proponent must implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site to the satisfaction of the Secretary.	Yes	<b>Section 3.2</b>	Nil	
<b><i>Integra Underground Air Quality and Greenhouse Gas Management Plan, condition 12, Schedule 3</i></b>	<b>Sufficient (Yes/No/Partial)</b>	<b>Document reference and comment</b>	<b>Action Required</b>	<b>Company Response</b>
<p>The Proponent must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that the project does not exceed or contribute to an exceedance of the criteria listed in Table 9 at any residence on privately-owned land or on more than 25 percent of any privately-owned land. (see DA08_0101 for table 9).</p> <p>For the purposes of this condition, 'reasonable and feasible avoidance and mitigation measures' includes, but is not limited to, the requirements in conditions 14 and 15 to develop and implement a real-time air quality management system that ensures effective operational response to the risk of exceedance of the criteria.</p>	Yes	<b>Section 3.1</b>	Nil	

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<b><i>Integra Underground Air Quality and Greenhouse Gas Management Plan, condition 13, Schedule 3</i></b>	<b>Sufficient (Yes/No/Partial)</b>	<b>Document reference and comment</b>	<b>Action Required</b>	<b>Company Response</b>
The Proponent must ensure that particulate matter emissions generated by the project do not exceed the criteria in Table 9 at any occupied residence on any mine-owned land (including land owned by adjacent mines), unless:				
(a) the tenant and/or landowner has been notified of any health risks in accordance with the notification requirements under Schedule 4 of this approval;	Yes	This information is located in <b>Section 5.1.2</b> , not <b>Section 3.1</b>	Please update reference in <b>Table 1-1</b> .	Table 1-1 updated
(b) the tenant on land owned by the Proponent can terminate the tenancy agreement without penalty, subject to giving reasonable notice, and the Proponent uses its best endeavours to provide assistance with relocation and sourcing of alternative accommodation;	No	No information regarding this condition could be located throughout the plan. Therefore this condition is not satisfied.	Please provide further information to satisfy this condition.	Commitment included in Section 5.1.2. Table 1-1 updated.
(c) air mitigation measures (such as air filters, a first flush roof water drainage system and/or air conditioning) are installed at the residence, if requested by the tenant and landowner (where owned by another mine other than the Proponent);	No	No information regarding this condition could be located throughout the plan. Therefore this condition is not satisfied	Please provide further information to satisfy this condition.	Commitment included in Section 5.1.2. Table 1-1 updated.

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(d) particulate matter air quality monitoring is undertaken to inform the tenant and landowner (where owned by a mine other than the Proponent) of potential health risks; and	No	No information regarding this condition could be located throughout the plan. Therefore this condition is not satisfied.	Please provide further information to satisfy this condition.	Commitment included in Section 5.1.2. Table 1-1 updated.
(e) monitoring data is presented to the tenant in an appropriate format, for a medical practitioner to assist the tenant in making an informed decision on the health risks associated with occupying the property, to the satisfaction of the Secretary.	No	No information regarding this condition could be located throughout the plan. Therefore this condition is not satisfied.	Please provide further information to satisfy this condition.	Commitment included in Section 5.1.2. Table 1-1 updated.
<b><i>Integra Underground Air Quality and Greenhouse Gas Management Plan, condition 14, Schedule 3</i></b>	<b>Sufficient (Yes/No/Partial)</b>	<b>Document reference and comment</b>	<b>Action Required</b>	<b>Company Response</b>
The Proponent must:				
(a) implement best practice air quality management on site, including all reasonable and feasible measures to minimise the off-site odour, fume and dust emissions generated by the project, including those	No	There is no information regarding this condition in <b>Table 3.1</b> as stated in <b>Table 1-1</b> , it is only stated that the Environment and Community Manager is the person responsible for minimising the use of odorous substances.	Please provide further information.	Included additional control measure in Table 3-1. Performance indicator in Table 2-4. Table 1-1 updated.

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generated by spontaneous combustion;				
(b) minimise any visible air pollution generated by the project;	Yes	<b>Section 3.1</b>	Nil	
(c) operate an air quality management system on site to ensure compliance with the relevant conditions of this approval;	Partial	<b>Section 3.1</b>	Nil	
(d) minimise the air quality impacts of the project during adverse meteorological conditions and extraordinary events (see note d in condition 12);	Yes	<b>Section 3.1 and Table 1-2</b>	Include reference to <b>Table 1-2</b> in <b>Table 1-1</b>	Table 1-1 updated.
(e) minimise surface disturbance of the site; and	Yes	<b>Section 3.1</b>	Nil	
(f) co-ordinate the air quality management on site with the air quality management of nearby mines (including Ashton, Rix's Creek North, Rix's Creek and the Mount Owen Complex) to minimise cumulative air quality impacts,	Partial	Section 3.1.1 – protocol referred to in this section, but detail not included. Noted that a combined CCC is operated and there are quarterly meetings with Ashton, Rix's Creek, Mt Owen and Glendell.	Please provide more information regarding the protocol and what actions are taken to minimise cumulative air quality impacts.	Additional detail about the protocol included in Section 3.1.1.
to the satisfaction of the Secretary.				
<b>Integra Underground Air Quality and Greenhouse Gas Management Plan, condition 16, Schedule 3</b>	<b>Sufficient (Yes/No/Partial)</b>	<b>Document reference and comment</b>	<b>Action Required</b>	<b>Company Response</b>

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For the life of the project, the Proponent must ensure that there is a meteorological station in the vicinity of the site that:				
(a) complies with the requirements in the <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i> guideline; and	Yes	<b>Section 4</b>	Nil	
(b) is capable of continuous real-time measurement of temperature lapse rate in accordance with the <i>NSW Industrial Noise Policy</i> or as otherwise approved by the EPA.	Partial	<b>Section 4.1</b> – Stated that the use of the Glendell meteorological station has been agreed with the EPA, however, there is no evidence of this provided.	Please provide evidence of agreement with EPA.	The meteorological station is consistent with that in Condition L3.5 of EPL 3390.
<b><i>Integra Underground Air Quality and Greenhouse Gas Management Plan, condition 2, Schedule 5</i></b>	<b><i>Sufficient (Yes/No/Partial)</i></b>	<b><i>Document reference and comment</i></b>	<b><i>Action Required</i></b>	<b><i>Company Response</i></b>
The Proponent must ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include:				
(a) detailed baseline data;	Yes	<b>Section 2.1</b>	Nil	
(b) a description of: <ul style="list-style-type: none"> <li>the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>any relevant limits or performance measures/criteria; and</li> <li>the specific performance indicators that are proposed to be used to judge the performance of,</li> </ul>	Yes	<b>Sections 1.3 and 2.3</b>	Nil	



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or guide the implementation of, the project or any management measures;				
(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	Yes	<b>Section 3.1</b>		
(d) a program to monitor and report on the: <ul style="list-style-type: none"> <li>impacts and environmental performance of the project; and</li> <li>effectiveness of any management measures (see (c) above);</li> </ul>	Yes	<b>Sections 4 and 5</b>	Nil	
(e) a contingency plan to manage any unpredicted impacts and their consequences;	Yes	<b>Section 5.1.2</b>	Nil	
(f) a program to investigate and implement ways to improve the environmental performance of the project over time;	Yes	<b>Section 5.2</b>	Nil	
(g) a program to regularly review management practices to align	Yes	<b>Section 5.2</b>	Nil	

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with contemporary best practice industry standards;				
(h) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>incidents;</li> <li>complaints;</li> <li>non-compliances with the conditions of this approval and statutory requirements; and</li> <li>exceedances of the impact assessment criteria and/or performance criteria; and</li> </ul>	Yes	<b>Sections 4.3 and 5.1.1</b>	Nil	
(i) a protocol for periodic review of the plan.	Yes	<b>Section 5.2</b>	Nil	
<b>General Comments</b>			<b>Action Required</b>	<b>Company Response</b>
<b>Other Agency Comments</b>			<b>Action Required</b>	<b>Company Response</b>