

Integra Underground Post Approval Review



Document: Integra Underground Noise Management Plan

Revision: Version 4, June 2020

Reviewed: Sarah Clibborn on 24 September 2020

<i>Integra Underground Noise Management Plan, Condition 2, Schedule 3</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
<p>Except for the land referred to in Table 1 for which the acquisition basis is noise, the Proponent must ensure that the noise generated by the project (excluding construction works specified in conditions 2A and 2B of Schedule 3) does not exceed the criteria in Table 2 at any residence on privately-owned land or on more than 25 percent of any privately-owned land.</p> <p>However, these criteria do not apply if the Proponent, or another mining company, has acquired the land or if the Proponent has a written agreement with the relevant landowner to exceed the criteria, and the Proponent has advised the Department in writing of the terms of this agreement.</p> <p>Noise generated by the project is to be measured in accordance with the relevant requirements of the INP. Appendix 5 sets out the requirements for evaluating compliance with these criteria.</p>	Partial	<p>Section 4.2 – while section 4.2.1 discusses the monitoring sites required for compliance with EPL 3390 (Noise Assessment Groups 3-7 inclusive), it does not consider the requirements of PA 08_0101. It is also unclear how NMP 3 can be representative of NMP 4, or how NMP 7 can be representative of NMP 6 as they are each representative of different Noise Assessment Groups. The justification provided in the report prepared by Umwelt is not adequate and the report also states that assessment of the monitoring points required for PA 08_0101 is outside the scope of the report.</p>	<p>Provide further information/justification regarding the proposal for primary and supplementary monitoring with regard to the requirements of PA 08_0101.</p>	<p>Attended noise monitoring location will remain as per current approved Noise Management Plan</p>

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<p>The noise criteria in Table 2 only have effect when, in the opinion of the Secretary, open cut mining operations at Rix's Creek North have been placed on care and maintenance or have permanently ceased.</p> <p><i>Note: To interpret the locations referred to in Table 2, see the applicable figures in Appendix 4.</i></p>				
Integra Underground Noise Management Plan, Condition 2A, Schedule 3	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
<p>The Proponent must manage noise from construction activities associated with the water pipeline infrastructure and Modification 8, in accordance with the noise management levels defined in Table 2 of the <i>Interim Construction Noise Guideline</i>.</p> <p>During construction of the water pipeline infrastructure and Modification 8, the Proponent must ensure that combined operational and construction noise from the development does not exceed a level of 5 dB(A) above the daytime operational $L_{Aeq(15min)}$ noise criteria in Table 3 during Standard</p>	Yes	Section 2.2.5, 4.2, 4.3 and 4.4.1 satisfy this condition.	Nil	

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Construction Hours (7 am to 6 pm, Monday to Friday; and 8 am to 1 pm on Saturdays) and does not exceed the evening or night time operational $L_{Aeq(15min)}$ noise criteria in Table 2, except where an alternative temporary limit has been approved by the Secretary for specific works or where the Proponent has an agreement with the owner/s of the relevant residence/land to generate higher noise levels, and the Proponent has advised the Department in writing of the terms of this agreement.				
<i>Integra Underground Noise Management Plan, Condition 2B, Schedule 3</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
In seeking an alternative temporary construction noise limit above the levels identified in condition 2A, the Proponent must submit a Construction Work Noise Protocol to the Secretary for approval, prior to undertaking the nominated construction works. This protocol must:				
(a) be prepared to the satisfaction of the Secretary;	NA	Alternative noise limits have not been sought.	NA	
(b) be prepared in consultation with the EPA and any landowners who may be affected by the proposed variation; and	NA	Alternative noise limits have not been sought.	NA	

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(c) address the relevant requirements of the <i>Interim Construction Noise Guideline</i> .	NA	Alternative noise limits have not been sought.	NA	
The Proponent may only undertake construction activities that require a Construction Work Noise Protocol, in accordance with a Construction Work Noise Protocol as approved from time to time by the Secretary.	NA	Alternative noise limits have not been sought.	NA	
<i>Integra Underground Noise Management Plan, Condition 3, Schedule 3</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
If noise generated by the project (excluding construction works specified in conditions 2A and 2B of Schedule 3) exceeds the criteria in Table 3 at any residence on privately-owned land or on more than 25 percent of any privately-owned land, then upon receiving a written request for acquisition from the landowner, the Proponent must acquire the land in accordance with the procedures in conditions 7 and 8 of Schedule 4.	Partial	Section 4.2 – while section 4.2.1 discusses the monitoring sites required for compliance with EPL 3390 (Noise Assessment Groups 3-7 inclusive), it does not consider the requirements of PA 08_0101. It is also unclear how NMP 3 can be representative of NMP 4, or how NMP 7 can be representative of NMP 6 as they are each representative of different Noise Assessment Groups. The justification provided in the report prepared by Umwelt is not adequate and the report also states that assessment of the monitoring points required	Provide further information/justification regarding the proposal for primary and supplementary monitoring with regard to the requirements of PA 08_0101.	Attended noise monitoring location will remain as per current approved Noise Management Plan

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<p>Noise generated by the project is to be measured in accordance with the relevant requirements of the INP. Appendix 5 sets out the requirements for evaluating compliance with these criteria.</p> <p>The acquisition noise criteria in Table 3 only have effect when, in the opinion of the Secretary, open cut mining operations at Rix's Creek North have been placed on care and maintenance or have permanently ceased.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> To interpret the locations referred to in Table 3, see the applicable figures in Appendix 4; and For this condition to apply, the exceedances of the criteria must be systemic. 		for PA 08_0101 is outside the scope of the report.		
<i>Integra Underground Noise Management Plan, Condition 4, Schedule 3</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
The Proponent must implement all reasonable and feasible measures to ensure that the noise generated by the project combined with the noise generated by other mines in the vicinity does not exceed the criteria in Table 4 at any residence on privately-owned land or on more than 25 percent of any privately-	Partial	<p>Section 3 satisfies the requirements for cumulative noise measurement and management.</p> <p>Section 4.2 – while section 4.2.1 discusses the monitoring sites required for compliance with EPL 3390 (Noise Assessment Groups 3-7</p>	<p>Nil</p> <p>Provide further information/justification regarding the proposal for</p>	<p>Attended noise monitoring location will remain as per current approved Noise Management Plan</p>

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<p>owned land (except for the residential receivers in Table 1 for which the acquisition basis is noise). The Proponent must share the costs associated with implementing these measures on as equitable basis as possible with the relevant mines.</p> <p>Cumulative noise is to be measured in accordance with the relevant requirements of the INP. Appendix 5 sets out the requirements for evaluating compliance with these criteria.</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 8 and 9 to develop and implement a real-time noise management system that ensures effective operational response to the risk of exceedance of the criteria.</p> <p><i>Note: To interpret the locations referred to in Table 4, see the applicable figures in Appendix 4.</i></p>		<p>inclusive), it does not consider the requirements of PA 08_0101. It is also unclear how NMP 3 can be representative of NMP 4, or how NMP 7 can be representative of NMP 6 as they are each representative of different Noise Assessment Groups. The justification provided in the report prepared by Umwelt is not adequate and the report also states that assessment of the monitoring points required for PA 08_0101 is outside the scope of the report.</p> <p>Section 4.3 satisfies the requirements for real time noise monitoring.</p>	<p>primary and supplementary monitoring with regard to the requirements of PA 08_0101.</p> <p style="text-align: center;">Nil</p>	
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<i>Integra Underground Noise Management Plan, Condition 5, Schedule 3</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
<p>If the noise generated by the project combined with the noise generated by other mines in the vicinity exceeds the criteria in Table 5 at any residence on privately-owned land or on more than 25 percent of privately-owned land (except for the residential receivers in Table 1 for which the acquisition basis is noise), then upon receiving a written request for acquisition from the landowner, the Proponent must acquire the land on as equitable basis as possible with the relevant mines in accordance with the procedures in conditions 7 and 8 of Schedule 4.</p> <p>Cumulative noise is to be measured in accordance with the relevant requirements of the INP. Appendix 5 sets out the requirements for evaluating compliance with these criteria.</p> <p>Notes:</p> <ul style="list-style-type: none"> To interpret the locations referred to in Table 5, see the applicable figures in Appendix 4; and 	No	It is stated that sections 4.2, 4.3 and 4.4.1 provide details regarding this condition, however these sections do not provide this information.	Please provide correct references and/or further information to satisfy this condition.	<p>Additional information included in Section 3.3.3.</p> <p>Table 1-1 updated with correct reference.</p>

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<ul style="list-style-type: none"> For these conditions to apply, the exceedances of the criteria must be systemic. 				
Integra Underground Noise Management Plan, Condition 6, Schedule 3	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
Upon receiving a written request from the owner of any residence:				
(a) on the land listed in Table 1 for which the acquisition basis is noise; or	No	It is stated that section 4.2 provides details regarding this condition, however this section does not provide this information.	Please provide correct references and/or further information to satisfy this condition.	Correct reference is Section 4.4. Table 1-1 updated.
(b) on the land listed in Table 6; or	No	It is stated that section 4.2 provides details regarding this condition, however this section does not provide this information.	Please provide correct references and/or further information to satisfy this condition.	Correct reference is Section 4.4. Table 1-1 updated.
(c) on privately-owned land where subsequent noise monitoring shows the noise generated by the project is greater than or equal to the criteria in Table 7, the Proponent must implement additional noise mitigation measures (such as double-glazing, insulation, and/or air conditioning) at the residence in consultation with the landowner.	No	It is stated that section 4.2 provides details regarding this condition, however this section does not provide this information.	Please provide correct references and/or further information to satisfy this condition.	Correct reference is Section 4.4. Table 1-1 updated.

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<p>If within 3 months of receiving this request from the owner, the Proponent and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p> <p>Cumulative noise is to be measured in accordance with the relevant requirements of the INP. Appendix 5 sets out the requirements for evaluating compliance with these criteria.</p> <p>The additional mitigation measures in Tables 6 and 7 only have effect when, in the opinion of the Secretary, open cut mining operations at Rix's Creek North have been placed on care and maintenance or have permanently ceased.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <i>To interpret the locations referred to in Table 7, see the figures in Appendix 4; and</i> <i>For these conditions to apply, the exceedances of the criteria must be systemic.</i> 	No	<p>It is stated that section 4.2 provides details regarding this condition, however this section does not provide this information.</p>	<p>Please provide correct references and/or further information to satisfy this condition.</p>	<p>Correct reference is Section 4.4. Table 1-1 updated.</p>
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<i>Integra Underground Noise Management Plan, Condition 7, Schedule 3</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
<p>If the cumulative noise generated by the project combined with the noise generated by other mines in the vicinity exceeds the criteria at any residence on the land referred to in Table 8, then upon receiving a written request from the owner, the Proponent must implement additional noise mitigation measures (such as double-glazing, insulation, and/or air conditioning) at the residence in consultation with the landowner. The Proponent must share the costs associated with implementing these measures on as equitable basis as possible with the relevant mines.</p> <p>If within 3 months of receiving this request from the owner, the Proponent and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p>	No	It is stated that section 4.4 provides details regarding this condition, however this section does not provide this information and instead provides detail on community complaints.	Please provide correct references and/or further information to satisfy this condition.	Additional information provided in Section 4.4.

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<p>Cumulative noise is to be measured in accordance with the relevant requirements of the INP. Appendix 5 sets out the requirements for evaluating compliance with these criteria.</p> <p>Notes:</p> <ul style="list-style-type: none"> To interpret the locations referred to in Table 8, see the figures in Appendix 4; and For these conditions to apply, the exceedances of the criteria must be systemic. 				
Integra Underground Noise Management Plan, Condition 8, Schedule 3	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
The Proponent must:				
(a) implement best practice noise management, including all reasonable and feasible noise mitigation measures, to minimise the construction, operational and low frequency noise generated by the project at all times, including during temperature inversions;	Yes	Section 3 provides information regarding this condition.	Nil	
(b) operate a comprehensive noise management system that uses a	Yes	Section 3 provides information regarding this condition.	Nil	

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combination of predicted meteorological forecasting and real-time noise monitoring data to guide the day-to-day planning of mining operations and the implementation of both proactive and reactive mitigation measures to ensure compliance with the relevant conditions of this approval;				
(c) implement all reasonable and feasible measures to minimise the release of noise emissions from noisy plant and equipment on site;	Yes	Section 3 provides information regarding this condition.	Nil	
(d) minimise the noise impacts of the project during meteorological conditions under which the noise limits of this approval do not apply (see Appendix 5); and	Yes	Section 3 provides information regarding this condition.	Nil	
(e) co-ordinate the noise management on site with noise management at nearby mines (including Ashton, Rix's Creek North, Rix's Creek and the Mount Owen Complex) to minimise cumulative noise impacts, to the satisfaction of the Secretary.	Yes	Section 3.3.3 provides information regarding this condition.	Nil	Also in Section 1.4. Table 1-1 updated.
<i>Note: Noisy plant and equipment includes both fixed and mobile sources, either underground or at the surface (such as pumps, conveyors, compressors, workshops, ventilation shafts, gaswell sites and diesel operated vehicles and loaders).</i>				

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<i>Integra Underground Noise Management Plan, Condition 9, Schedule 3</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
The Proponent must prepare a Noise Management Plan for the project to the satisfaction of the Secretary. This plan must:				
a. be prepared in consultation with the EPA, and then submitted to the Secretary for approval;	Yes	Section 1.4 states that this plan was revised as a result of consultation with the EPA and changes to EPL 3390. Documentation of correspondence with the EPA is provided in Appendix A .	Nil.	
b. describe the measures that would be implemented to ensure: <ul style="list-style-type: none"> i. compliance with the noise criteria and operating conditions of this approval; and ii. best management practice is being employed; 	Yes	Section 3 focuses on implementation of preventative and corrective measures, along with training and review procedures to ensure best practice management.	Nil.	
c. describe the noise management system in detail;	Yes	Section 3.3 describes corrective measures in the event of an exceedance, section 3.2 also outlines preventative measures. Section 3.2.2 refers to PA 08_0102 instead of PA 08_0101.	Please add reference to Section 3.2 in Table 1-1 . Correct reference as required.	Table 1-1 updated.
d. include a noise monitoring program that:	Yes	Section 4.4 specifically related to Community Complaints. Section 4 overall relates to the noise monitoring program.	Amend reference in Table 1-1 as required.	

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i. uses a combination of real-time and supplementary attended monitoring measures to evaluate the performance of the project;				
ii. includes a protocol for determining exceedances of the relevant conditions in this approval;	Yes	Section 3.3 relates to exceedance protocols and corrective actions.	Amend reference in Table 1-1 as required.	Table 1-1 updated.
iii. evaluates and reports on the effectiveness of the noise management system and the best practice noise management measures; and	Yes	Section 5 relates to reporting.	Amend reference in Table 1-1 as required.	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 located regarding this condition.	Please provide information.	This condition wording is incorrect. Information for correct condition is included in Sections 1.4 and 3.3.3.
<i>Integra Underground Mining Operations Plan, Condition 2, Schedule 5</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
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	Section 2.1 addresses this condition.	Nil.	

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(b) a description of: i. the relevant statutory requirements (including any relevant approval, licence or lease conditions);	Yes	Sections 2.2.2 to 2.2.5 address this condition.	Only Section 2.2.2 is referenced in Table 1-1 . Amend reference accordingly.	Table 1-1 updated.
ii. any relevant limits or performance measures/criteria; and	Yes	Section 2 addresses this condition.	Nil.	
iii. the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;	Yes	Section 2 addresses this condition.	Nil.	
(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	Yes	Sections 3 and 4 address this condition. Table 1-1 specifically references Section 4.4 which relates only to Community Complaints.	Amend reference in Table 1-1 accordingly.	Table 1-1 updated.
(d) a program to monitor and report on the: • impacts and environmental performance of the project; and	Yes	Section 4 addresses this condition.	Nil.	
• effectiveness of any management measures (see (c) above);	Yes	Section 5 addresses this condition. Section 4 is referenced in Table 1-1 .	Amend reference in Table 1-1 accordingly.	Table 1-1 updated.

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(e) a contingency plan to manage any unpredicted impacts and their consequences;	Partial	Table 1-1 states that this information can be found in Section 4.4 . However, Section 5.2 titled Contingency Plan, states that Section 3.2 covers this requirement. Section 3.2 only relates to preventative measures and cumulative noise management.	Please amend references and provide further information.	Correct reference is Section 3.3. This has been updated in Section 5.2. Table 1-1 updated.
(f) a program to investigate and implement ways to improve the environmental performance of the project over time;	Yes	Section 5.3 addresses this condition.	Nil.	
(g) a program to regularly review management practices to align with contemporary best practice industry standards;	Yes	Section 3.5 and section 5.3 address this condition.	Nil	
(h) a protocol for managing and reporting any:				
<ul style="list-style-type: none"> incidents; 	No	No protocol found in regard to incident reporting.	Please provide further information.	See Section 3.3.1. Additional information added in Section 5.1.
<ul style="list-style-type: none"> complaints; 	Yes	Section 4.4 addresses this condition.		
<ul style="list-style-type: none"> non-compliances with the conditions of this approval and statutory requirements; and 	No	No protocol found in regard to incident reporting.	Please provide further information.	See Section 3.3.1. Additional information added in Section 5.1.

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<ul style="list-style-type: none"> exceedances of the impact assessment criteria and/or performance criteria; and 	Yes	Table 1-1 states that this information is located in Section 4.4 . Section 3.3 addresses this condition.	Amend reference in Table 1-1 accordingly.	Table 1-1 updated.
(i) a protocol for periodic review of the plan.	Yes	Section 5.3 addresses this condition.	Nil.	
<i>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</i>	NA	NA	NA	
Integra Underground Mining Operations Plan, Condition 7, Schedule 5	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
To ensure the strategies, plans or programs under this approval are updated on a regular basis, and that they incorporate any appropriate mitigation measures to improve the environmental performance of the project, the Proponent may at any time submit revised strategies, plans or programs to the Secretary for approval. With the agreement of the Secretary, the Proponent may also submit any strategy, plan or program required by this approval on a staged basis.	Yes	The EPA was consulted in the preparation of this plan as required by condition 9 of Schedule 3.	Nil.	

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With the agreement of the Secretary, the Proponent may revise any strategy, plan or program approved under this approval without consulting with all the parties nominated under the applicable conditions of approval.				
<p>Notes:</p> <ul style="list-style-type: none"> While any strategy, plan or program may be submitted on a progressive basis, the Proponent must ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times; and If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program. 	NA	NA	NA	

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<i>Integra Underground Mining Operations Plan, Appendix 5</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
1. Attended monitoring is to be used to evaluate compliance with the relevant conditions of this approval.	Partial	Section 4.2 addresses attended monitoring, however, while section 4.2.1 discusses the monitoring sites required for compliance with EPL 3390 (Noise Assessment Groups 3-7 inclusive), it does not consider the requirements of PA 08_0101. It is also unclear how NMP 3 can be representative of NMP 4, or how NMP 7 can be representative of NMP 6 as they are each representative of different Noise Assessment Groups. The justification provided in the report prepared by Umwelt is not adequate and the report also states that assessment of the monitoring points required for PA 08_0101 is outside the scope of the report.	Provide further information/justification regarding the proposal for primary and supplementary monitoring with regard to the requirements of PA 08_0101.	Attended noise monitoring location will remain as per current approved Noise Management Plan
2. Data collected for the purposes of determining compliance with the relevant conditions of this approval is to be excluded under the following meteorological conditions: a) during periods of rain or hail;	No	It is stated that Section 4.4.2 provides information regarding this condition. There is no Section 4.4.2 in the plan.	Please provide correct references and/or further information to satisfy this condition.	Section 3.3.2 is the correct reference. Table 1-1 updated.

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<ul style="list-style-type: none"> b) average wind speed at microphone height exceeds 5 m/s; c) wind speeds greater than 3 m/s measures at 10 m above ground level; and d) temperature inversion conditions greater than 3°C/100m. 				
<p>3. Unless otherwise agreed with the Secretary, this monitoring is to be carried out in accordance with the relevant requirements relating for reviewing performance set out in the INP, in particular the requirements relating to:</p> <ul style="list-style-type: none"> a) monitoring locations for the collection of representative noise data; b) equipment used to collect noise data, and conformity with Australian Standards relevant to such equipment; and c) modifications to noise data collected, including for the exclusion of extraneous noise and/or penalties for 	<p>Partial</p>	<p>Section 4.2.2 and 4.2.3 provide sufficient information for conditions 3(b) and 3(c) of Appendix 5, however they do not provide information regarding monitoring sites as required by condition 3(a) of Appendix 5.</p>	<p>Please provide correct references and/or further information to satisfy this condition.</p>	<p>Attended noise monitoring location will remain as per current approved Noise Management Plan</p>

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modifying factors apart from adjustments for duration.				
4. To the extent that there is any inconsistency between the INP and the requirements set out in this Appendix, the Appendix prevails to the extent of the inconsistency.	NA	Noted by Integra.	NA	
5. Except for wind speed at microphone height, the data to be used for determining meteorological conditions shall be that recorded by the meteorological station located on the site (as required by condition 16 of Schedule 3).	Yes	The table refers to section 4.4.2 , however this section does not exist. This information is located in section 4.2.4 .	Please amend reference.	Table 1-1 updated.
General Comments			Action Required	Company Response
Table 1-4 in Section 1.3.2 has noise limits listed under the columns entitled "Type of monitoring point" and "Location description".			Amend as required.	Amended
Table 3-1 in Section 3.1 – in the second row of the Implementation column, the paragraph from the first row has been duplicated and it does not match the existing or proposed action.			Amend as required.	Amended
Table 1-4 in Section 1.3.2 – There is an error in the first row with regard to Condition P1.4. The columns withing the second cell appear to have noise limit values in them rather than the type of monitoring point and location description as shown in the EPL.			Amend as required.	Amended
The report from Umwelt suggests that NMP 3 is representative of NAGs 3, 4 and 5 (unless there is an exceedance at NMP3, in which case 'supplementary monitoring' will be carried out at NMP4 to assess compliance against criteria for NAGs 4 and 5. Similarly, NMP7 will be representative of NAGs 7 and 6, unless there is an exceedance at NMP 7, in which case 'supplementary monitoring will be carried out at NMP 6 to determined compliance against criteria for NAG 6).			Please provide further information clarifying/justifying this approach.	Attended noise monitoring location will remain as per current approved

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However, this is not explicit in the Management Plan. The Management Plan explains that NMP 3 and 7 will be used to assess compliance with NAGs 3 to 7, but it does not clearly state how each point represents the respective NAGs. Refer to Section 4.2.1 of the NMP which explains that monitoring will be undertaken at locations representative of the NAGs listed in Table 2-2 and monitoring points “shown in Figure 2”. This figure only shows the supplementary points as a different colour. It does not show any monitoring points for NAGs 1, 2 or 5.		Noise Management Plan				
The supporting report from Umwelt explains that NMP 5 has been removed, as NMP 3 and NMP 4 are closer to IUG operations, and so NMP3 will be used to assess compliance against criteria for NAG 5. Similarly, the MP needs to outline how the criteria for NAG 1 and NAG 2 will be assessed (i.e. which monitoring points will be used?) as this is not evident in the plan.	Please state clearly in the plan that this is the case and provide justification for this approach.	Attended noise monitoring location will remain as per current approved Noise Management Plan. Section 4.2.1 has been updated to provide clarification about NAGs 1 & 2.				
In order to assess compliance against the criteria, the Management Plan needs to explicitly state which Noise Assessment Group each monitoring location represents. The current revision assumes the reader has read the Umwelt report and understands the difference between the primary (3 and 7) and supplementary monitoring points (4 and 6), and which NAG they represent. A table similar to that below could be included in the section on attended noise monitoring (4.2.3), or Table 2-2 could be updated to incorporate the representative Noise Monitoring Point for each NAG. <table><tr><th>Noise Assessment Group</th><th>Noise Monitoring Location</th></tr><tr><td>1</td><td>?</td></tr></table>	Noise Assessment Group	Noise Monitoring Location	1	?		Attended noise monitoring location will remain as per current approved Noise Management Plan
Noise Assessment Group	Noise Monitoring Location					
1	?					

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2	?			
3	3 (Primary monitoring location for NAG 3, 4 and 5).			
4	3 (unless monitoring results exceeds criteria for NAG 3, in which case monitoring at NMP 4 will be conducted)			
5	3 (unless monitoring results exceed criteria for NAG 3, in which case monitoring at NMP 4 will be conducted)).			
6	7 (unless 7 exceeds criteria for NAG 7, in which case 6 will be used).			
7	7 (primary monitoring location for NAG 6 and 7)			
8	8			
9	9			
10	10			
Umwelt's supporting report states that if the noise levels from IUG are above the noise limits for at the primary monitoring points, additional compliance monitoring should be completed at the supplementary monitoring points (i.e. NMP 4 for NAG 4 and 5, and NMP6 for NAG 6).		Please explain the process for carrying out supplementary monitoring at NMPs 4 and 6 when there are exceedances	Attended noise monitoring location will remain as per current approved	

Integra Underground
Post Approval Review



Document: Integra Underground Noise Management Plan

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	at the primary monitoring points (3 and 7).	Noise Management Plan
Other Agency Comments	Action Required	Company Response