

BULGA COAL

GLENCORE

Bulga Coal 2021 Independent Environmental Audit Recommendations and Proposed Actions in Response

Condition Reference	Context	Recommendation	Action Proposed by Bulga Coal	By When
SSD 4960 Schedule 3, Condition 13	No overpressure or vibrations results were recorded at the Dawtrey monitor for blasts fired at Bulga Open Cut on 27/04/21 at 14:18 and 29/04/21 at 12:24.	Continue to ensure equipment is regularly serviced, maintained, and is fit for purpose.	Bulga to continue servicing and maintaining blast equipment.	Ongoing
SSD 4960 Schedule 3, Condition 16	Multiple exceedances in PM10 concentration (24-hour average) at monitoring locations	Continue to implement the dust TARP and review it periodically.	Bulga to continue to implement the dust TARP and review it periodically.	Ongoing
SSD 4960 Schedule 3 Condition 17	Several exceedances of 24-hour PM10 assessment criteria were recorded by the BCC air quality monitoring network during the audit period. While standard Glencore tenancy agreements are issued that include advice on health risks associated with exceedances. Currently tenants of these properties are not notified of exceedances when they occur.	Where exceedances of particulate emission limits occur, ensure that notification is provided for tenants on mine owned land.	Bulga will notify tenants of mine owned properties if the air quality criteria is exceeded in the region of the properties as a result of Bulga Coal emissions.	Triggered by exceedance

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Condition Reference	Context	Recommendation	Action Proposed by Bulga Coal	By When
SSD 4960 Schedule 3, Condition 27	Multiple discharge events of sediment laden water and Chemical and hydrocarbon storage at workshop	Continue to conduct regular inspections and maintenance of drainage infrastructure to avoid preventable discharge events. Where required review water infrastructure design. Ensure Chemical and hydrocarbon storage is periodically reviewed for compliance against the relevant Australian standards. Consider diverting the water off the workshop roof structures to capture it for utilisation on site.	Bulga to continue to conduct regular inspections and maintenance of drainage infrastructure. Annual compliance assessment of sediment dams and drains capacity and catchment areas undertaken. Undertake a compliance review against the relevant Australian Standards for chemical and hydrocarbon storage across site. Investigate the potential and feasibility of divert the water off the workshop roof to capture it onsite for use.	Ongoing 30/06/2023 30/06/2022
SSD 4960 Schedule 3, Condition 51A	Bushfire Management Plan	Section 9.1 of GCAA-625378177-10531 GCAA Work Authorisation and Permit System – Protocol should be referenced in Section 6 of the Bushfire Management Plan to meet item d.	Review the Bushfire Management Plan to ensure that Section 9.1 of GCAA-625378177-10531 GCAA Work Authorisation and Permit System – Protocol is referenced in Section 6 to meet item (d) of SSD 4960 S3 C51A.	30/06/2022
SSD 4960 Schedule 3, Condition 52	Waste management	It is recommended that the bioremediation area be sign posted to better track contaminated material deposited.	Install sign posts at the bioremediation area to better track contaminated material deposited.	30/06/2022

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SSD 4960 Schedule 3, Condition 52C	Chemical and hydrocarbon storage	Continue to ensure that the storage, handling, and transport of dangerous goods is reviewed whenever new products are brought to site or existing materials are moved around site.	All new chemicals require approval to be brought onto site as per the Chemical Management Procedure BULOC-1104430715-1177. Where existing materials are moved around site, the Change Management Procedure BULOC-1104430715-2361 must be followed to ensure risks are managed appropriately.	As triggered
SSD 4960 Schedule 3, Condition 53	Rehabilitation Objectives	1. Undertake a whole of site soil balance to quantify shortfall and plan for contingency. There is 260ha of 'Agricultural land' to be established at the end of mine life. This is currently a risk to lease relinquishment down the track if there is inadequate soil to verify the land is resilient to stock grazing, drought, erosion etc in comparison to analogue sites. Some soil material was lost to Rhodes Grass contamination in the rehabilitation that is to be re-disturbed.	Undertake a whole of site soil balance to quantify shortfall and plan for contingency.	31/12/2022
		2. Plan and install additional access tracks throughout rehab to provide easy access for rehab inspections and maintenance, especially as the geomorphic landform is being used from this point forward. The site is already planning this but worth mentioning as a support for the idea.	Undertake a review of whether additional access tracks can be installed throughout rehab to provide easier access for rehabilitation inspections and maintenance.	31/12/2022
		3. Ensure Topsoil stockpiles are signposted to reduce chance of disturbance or dumping.	Install sign posts for topsoil stockpiles to reduce the chance of disturbance or dumping.	31/12/2022

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Condition Reference	Context	Recommendation	Action Proposed by Bulga Coal	By When
SSD 4960 Schedule 5, Condition 5	In September 2019, Bulga Coal received a Show Cause Notice from DPIE for failing to operate the CCC in accordance with the CCC Guidelines.	Ensure CCC operation is periodically reviewed for compliance against the Department's Community Consultative Committee Guidelines for State Significant Projects (2016, or its latest version).	Undertake a compliance review of the CCC operation against the Department's Community Consultative Committee Guidelines for State Significant Projects (2016, or its latest version).	30/06/2022
DA-41-03-99 Schedule 2, Condition 6.2	No overpressure or vibrations results were recorded at the Dawtrey monitor for blasts fired at Bulga Open Cut on 27/04/21 at 14:18 and 29/04/21 at 12:24.	Relinquish DA-41-03-99	Relinquish DA-41-03-99.	30/06/2022
DA-41-03-99 Schedule 2, Condition 6.3.5	Cumulative Land Acquisition Criteria	Relinquish DA-41-03-99	Relinquish DA-41-03-99.	30/06/2022
DA-41-03-99 Schedule 2, Condition 6.3.6	Cumulative land acquisition criteria are not provided in the noise management plan. Cumulative mine noise is not measured during regular noise compliance monitoring. It is not possible, based on the information provide, to determine if the cumulative noise impact assessment criteria are being achieved.	Relinquish DA-41-03-99	Relinquish DA-41-03-99.	30/06/2022
DA-41-03-99 Schedule 2, Condition 8.2	The AQMP and WMP have not been updated to include quality assurance/quality control plan and shall require approval from the relevant regulatory agencies.	Relinquish DA-41-03-99	Relinquish DA-41-03-99.	30/06/2022
DA-41-03-99 Schedule 2, Condition 10.1	In September 2019, Bulga Coal received a Show Cause Notice from DPIE for failing to operate the CCC in accordance with the CCC Guidelines.	Ensure CCC operation is periodically reviewed for compliance against the Department's Community Consultative Committee Guidelines for State Significant Projects (2016, or its latest version).	Undertake a compliance review of the CCC operation against the Department's Community Consultative Committee Guidelines for State Significant Projects (2016, or its latest version).	30/06/2022
DA 376-8-2003 Schedule 4 Condition 22	Impact Assessment Criteria - Multiple exceedances in PM10 concentration (24-hour average) at monitoring locations.	Continue to implement the dust TARP and review it periodically.	Bulga to continue to implement the dust TARP and review it periodically.	Ongoing

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DA 376-8-2003 Schedule 4 Condition 24	Air Quality Operating Conditions - Failure to minimise dust emissions from the deep pit tailings emplacement area.	Continue to implement the dust TARP and review it periodically.	Bulga to continue to implement the dust TARP and review it periodically.	Ongoing
DA 376-8-2003 Schedule 4 Condition 24A	Air Quality & Greenhouse Gas Management Plan	AQGGMP should include evidence of approval of the suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary along with evidence of consultation with the EPA in Appendix C.	The Air Quality Management Plan will be revised to include evidence of approval that the suitably qualified and experienced person has been endorsed by the Planning Secretary along with evidence of consultation with the EPA.	30/06/2022
DA 376-8-2003 Schedule 6, Condition 6	Community Consultative Committee - In September 2019, Bulga Coal received a Show Cause Notice from DPIE for failing to operate the CCC in accordance with the CCC Guidelines.	Ensure CCC operation is periodically reviewed for compliance against the Department's Community Consultative Committee Guidelines for State Significant Projects (2016, or its latest version).	Undertake a compliance review of the CCC operation against the Department's Community Consultative Committee Guidelines for State Significant Projects (2016, or its latest version).	30/06/2022
EPL 563 Condition P1.4	No overpressure or vibrations results were recorded at the Dawtrey monitor for blasts fired at Bulga Open Cut on 27/04/21 at 14:18 and 29/04/21 at 12:24.	Continue to ensure equipment is regularly serviced, maintained, and is fit for purpose.	Bulga to continue servicing and maintaining blast equipment.	Ongoing
EPL 563 Condition L1.1	Pollution of waters – multiple discharges of sediment laden water	Continue to conduct regular inspections and maintenance of drainage infrastructure to avoid preventable discharge events.	Bulga to continue to conduct regular inspections and maintenance of drainage infrastructure. Annual compliance assessment of sediment dams and drains capacity and catchment areas undertaken.	Ongoing
EPL 563 Condition O1.1	Chemical and hydrocarbon storage	Ensure Chemical and hydrocarbon storage is periodically reviewed for compliance against the relevant Australian standards.	Undertake a compliance review against the relevant Australian Standards for chemical and hydrocarbon storage across site.	30/06/2023

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EPL 563 Condition O3.1	Multiple exceedances in PM10 concentration (24-hour average) at monitoring locations.	Continue to implement the current air quality monitoring and management protocols. Continue to undertake detailed analysis of monitoring results, particularly for exceedance days to determine the likely contribution from Bulga Coal Complex operations to recorded concentrations. Continue to implement the dust TARP and review it periodically.	Bulga to continue to implement the Air Quality and Greenhouse Gas Management Plan.	Ongoing
EPL 563 Condition O3.3	Tailings Emplacement Area - Failure to Minimise Dust.	Continue to implement the dust TARP and review it periodically.	Bulga to continue to implement the dust TARP and review it periodically.	Ongoing
EPL 563 Condition O6.1	Failure to adequately bund flocculant tanks and other tanks containing materials that could cause environmental harm.	Continue to ensure all existing and new above-ground tanks containing material that is likely to cause environmental harm are banded or have an alternative spill containment system in place.	Bulga to continue to implement the Chemical Bund Management Procedure BULOC-1104430715-27248.	Ongoing
EPL 563 Condition M2.2	Air Monitoring Requirements - PM10 was not monitored continuously at EPA Point 9 and Point 10 due to equipment failure.	Continue to ensure equipment is regularly serviced, maintained, and is fit for purpose.	Bulga to continue servicing and maintaining blast equipment.	Ongoing
EPL 563 Condition M4.1	Weather monitoring - Weather data was not monitored continuously at EPA Point 20, Point 21 and Point 23 due to the equipment failure during the EPL Annual Return reporting period.	Continue to ensure equipment is regularly serviced, maintained, and is fit for purpose.	Bulga to continue servicing and maintaining blast equipment.	Ongoing
EPL 563 Condition M9.4	Requirement to Monitor Particulate Matter - PM10 concentrations are monitored at 10 min intervals.	Continue to ensure equipment is regularly serviced, maintained, and is fit for purpose.	Bulga to continue servicing and maintaining blast equipment.	Ongoing
ML1547 Schedule 00, Condition 2.1	Failure to comply with Condition 2(1) of ML1547 – Conduct operations in accordance with MOP due to spatial data review.	Review quality assurance process and ensure data management systems are up to date.	Undertake a review of the quality assurance process for MOP GIS data management and ensure the GIS system is up to date.	30/09//2022