



Bengalla Mining Company Pty Limited

Environmental Management Strategy

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1.0 INTRODUCTION

1.1 Background

Bengalla Mining Company Pty Limited (BMC) operates the Bengalla Mine (Bengalla), which is located approximately 4 km west of Muswellbrook in the Upper Hunter Valley, NSW (**Figure 1**).

BMC was granted Development Consent for State Significant Development (SSD) 5170 on 3 March 2015 by the Secretary of the Department of Planning and Environment (DP&E) for the Continuation of Bengalla. BMC commenced under SSD-5170 on 1 October 2015.

This Environmental Management Strategy (EMS) has been developed in accordance with the requirements of Schedule 5, Condition 1 of SSD-5170 (as modified) to provide a framework for environmental management at Bengalla.

1.2 History of Operations

1.2.1 Introduction

BMC was originally granted Development Consent (DA 211/93) in 1996 to construct and operate an open cut coal mine and associated activities. Mining operations at Bengalla commenced in 1998. DA211/93 was surrendered on 22 December 2016.

SSD-5170 (as modified) is now the applicable development consent for Bengalla.

1.2.2 State Significant Development 5170

In September 2013, BMC sought a new development consent under Division 4.1 of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to enable mining operations to continue at Bengalla. The application was supported by the '*Continuation of Bengalla Mine Environmental Impact Statement*' (Bengalla EIS) (Hansen Bailey, 2013) as modified by the '*Continuation of Bengalla Mine Response to Submissions*' (RTS) (Hansen Bailey, 2014).

On 3 March 2015, the Secretary of DP&E as delegate of the Minister for Planning granted SSD-5170 (as modified) which permits the following activities at Bengalla:

- Open cut mining towards the west at a rate of up to 15 Mtpa ROM coal until 2039;
- Continued use of the existing dragline, truck fleet and excavators;
- An out of pit Overburden Emplacement Area (OEA) to the west of Dry Creek which may be utilised for excess spoil material until it is intercepted by mining;
- Various upgrades, relocations or additional new infrastructure to support the Project;
- Processing, handling and transportation of coal via the (upgraded) Coal Handling and Preparation Plant (CHPP) and rail loop for export and domestic sale;

- Continued rejects and tailings co-disposal in the Main OEA and temporary in pit reject emplacement;
- Relocation of a 6 km section of Bengalla Link Road at approximately Year 15 near the existing mine access road to facilitate coal extraction;
- The diversion of Dry Creek via dams and pipe work with a later permanent alignment of Dry Creek through rehabilitation areas when emplacement areas are suitably advanced;
- Relocation of water storage infrastructure as mining progresses through existing dams (including the Staged Discharge Dam and Hunter River Raw Water Dam); and
- A workforce of approximately 900 full time equivalent personnel (plus contractors) at peak production.

1.2.3 Bengalla Development Consent – Modification 1

SSD-5170 was modified on 16 December 2015 by the Executive Director – Resource Assessments and Compliance for the DP&E (as delegate of the Minister for Planning) for the activities largely described in the '*Bengalla Mine Development Consent Modification Statement of Environmental Effects*' (Hansen Bailey, 2015) (MOD 1 SEE). The MOD 1 SEE provides approval for the following:

- Alterations to various water management infrastructure components including:
 - Utilisation of the Satellite Pit as a temporary mine water catchment dam;
 - Relocation of the Staged Discharge Dam and the Hunter River Salinity Trading Scheme staged discharge release point;
 - Construction of clean water diversion levees in locations other than those already approved; and
 - Revised locations for the proposed relocation of the Hunter River Raw Water Dam and Washery Dam;
- Additional locations for the siting of the Explosives Storage Facility; and
- Placement of fill from the excavation of the Dry Creek Clean Water Dam (CW1) adjacent to it.

1.2.4 Bengalla Development Consent – Modification 2

SSD-5170 was modified on 1 July 2016 by the Director – Resource Assessments for the DP&E as delegate of the Minister for Planning for the activities largely described in the '*Bengalla Mine Development Consent Modification Statement of Environmental Effects*' (Hansen Bailey, 2016) (MOD 2 SEE). The MOD 2 SEE provides approval for the following:

- Alterations to the approved height of the Main OEA to improve visual amenity from primary viewing locations in and surrounding the township of Muswellbrook and Denman Road, in two selected locations (Visual Relief Areas):
 - The Northern Relief Area constructed to a maximum height of Reduced Level (RL) 300; and
 - The Southern Relief Area constructed to a maximum height of RL 290.
- Establishment of a new gravel access road from Wybong Road to the Dry Creek Diversion Project Construction Site Office being a former homestead (Homestead Access).

1.2.5 Bengalla Development Consent – Modification 3

SSD-5170 was modified in December 2016 by the Director – Resource Assessments for the DP&E as delegate of the Minister for Planning for the activities largely described in the “*Bengalla Mine Development Consent Modification 3 Statement of Environmental Effects*” (Hansen Bailey, 2016) (SEE MOD 3). The MOD 3 SEE provides approval for the following:

- The construction and operation of an explosives facility and reload facility;
- The alignment of the Hunter River pipeline; and
- The emplacement and use of temporary topsoil stockpiles during mining process.

1.2.6 Bengalla Development Consent – Modification 4

SSD-5170 was modified in December 2018 by the Director – Resource Assessments for the DP&E as delegate of the Minister for Planning for the activities largely described in the “*Bengalla Mine Development Consent Modification 4 Statement of Environmental Effects*” (Hansen Bailey, 2017) (SEE MOD 4). The SEE (Mod 4) provides approval for the following:

- Changes to the approved water management system to reflect operations at Bengalla including proposed enlargement of the approved Staged Discharge Dam (ED1), and construction and use of the Dry Creek East Dam;
- Temporary storage of approximately 2,500 m³ of excess materials from the construction of ED1;
- Increase in the capacity and additional locations of ROM coal stockpiles;
- Additional storage locations for temporary emplacement of coal processing rejects material, prior to permanent emplacement; and
- Temporary clay emplacement within the Main OEA or to the west of this for later use in the reinstatement of Dry Creek.

The approved development layout is presented in **Figure 2**.



BENGALLA MINE

Regional Locality

FIGURE 1



Figure 2 – Development Layout

1.3 Document Purpose

This document has been prepared to satisfy Schedule 5, Condition 1 of SSD-5170 (as modified), which requires the preparation of an EMS. This EMS provides an overview of environmental management at Bengalla. **Table 1** outlines the requirements under Schedule 5, Condition 1 of SSD-5170 (as modified) and explains how these requirements have been addressed by this document. This document was provided to the Department of Planning Industry and Environment (DPIE) for review and approval. Approval was granted on **XX/XX/XXXX** and a copy of the correspondence is included in **Appendix A**.

This EMS is a public document that provides information for BMC personnel, contractors, government stakeholders and the community. This document is made publicly available on the BMC website:

newhopegroup.com.au/bengalla-mine/

Table 1
Environmental Management Strategy Requirements

Condition	Requirement	Relevant Sections
Schedule 5, Condition 1	The Applicant must prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Secretary. The strategy must:	This document
	a) Be submitted to the Secretary for approval within 6 months of the date of this consent;	Cover Page
	b) Provide the strategic framework for environmental management of the development	Section 2.0
	c) Identify the statutory approvals that apply to the development	Section 2.3
	d) Describe the role, responsibility, authority, and accountability of all key personnel involved in environmental management of the development	Section 4.1
	e) Describe the procedures that would be implemented to: <ul style="list-style-type: none"> Keep the local community and relevant agencies informed about the operation and environmental performance of the development Receive, handle, respond to, and record complaints Resolve any disputes that may arise during the course of the development Respond to any non-compliance Respond to emergencies 	Section 4.0
	f) Include: <ul style="list-style-type: none"> References to any strategies, plans and programs approved under the conditions of this consent 	Section 3.2 and Appendix B

Condition	Requirement	Relevant Sections
	<ul style="list-style-type: none"> A clear plan depicting all the monitoring, required to be carried out in relation to the development 	
	The Applicant must implement the approved strategy as approved from time to time by the Secretary	BMC operates in accordance with its approved strategies and plans.

1.4 Document Structure

Section 1.0 provides background information on BMC, describes the Bengalla and the development consent under which it operates;

Section 2.0 outlines BMC's overarching strategy for environmental management and summarises the legislative requirements that apply to Bengalla;

Section 3.0 outlines the Bengalla Environmental Management System;

Section 4.0 outlines the processes for implementation of the Bengalla Environmental Management System;

Section 5.0 defines the abbreviations and acronyms used in this document; and

Section 6.0 references the sources relied on in this document.

2.0 STRATEGIC CONTEXT

2.1 Mission Statement

BMC's mission is to produce safe, productive and profitable coal. BMC honours its commitment to manage health, safety and environmental risks and to work with the community to build enduring relationships.

2.2 Strategy

Environmental management is an integral part of BMC's overall business. BMC appropriately manages all activities that have the potential to impact upon the environment. These includes coal mining operations, coal handling and processing operations, construction work and all support services associated with the business.

The prevention and management of the potential and actual environmental impacts associated with BMC's operations can be achieved through:

- Taking a systematic approach;
- Taking preventive action in preference to reactive correction;
- Proactive attention to environmental issues by all people within the organisation; and
- Innovative changes to the way we work in order to continually improve our environmental performance.

This EMS aims to integrate environmental management planning into BMC's strategic and business planning cycle.

2.3 Regulatory Requirements

The primary regulatory requirements that are relevant to Bengalla's operations are listed in **Table 2**.

Table 2
Relevant Legislation and Authorisations

Primary Legislation	BMC's Authorisations
<i>Environmental Planning and Assessment Act 1979</i>	SSD-5170 (as modified)
<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Commonwealth)	EPBC 2012/6378
<i>Protection of the Environment Operations Act 1997</i>	EPL 6538
<i>Water Management Act 2000</i>	Water Access Licences
<i>Water Act 1912</i>	Bore Licences
<i>Mining Act 1992</i>	ML 1397, ML 1450, ML 1469, ML 1711, ML 1728, ML 1729 and ML 1796

Other Acts that may be relevant to environmental management at Bengalla include:

- *Heritage Act 1977*
- *National Parks and Wildlife Act 1974*
- *Native Vegetation Act 2003*
- *Biodiversity Conservation Act 2016;*
- *Noxious Weeds Act 1993*
- *Threatened Species Conservation Act 1995*
- *Contaminated Land Management Act 1997*
- *Waste Avoidance and Resources Recovery Act 2001; and*
- *Roads Act 1993.*

3.0 ENVIRONMENTAL MANAGEMENT SYSTEM

3.1 Overview

The Bengalla Environmental Management System allows BMC to:

- Efficiently manage its environmental issues;
- Enable compliance with regulatory requirements;
- Enable improvement to environmental performance; and
- Liaise with stakeholders and the local community.

The Environmental Management System is comprised of several management documents, including this EMS. **Table 3** lists the types of documents that form the Environmental Management System and describes their purposes.

Management Strategies, Plans and Monitoring Programs have been prepared and are revised in accordance with the relevant conditions of SSD-5170 (as modified).

All documents in the Environmental Management System are maintained on Lotus Notes or similar (an internal database) so that they are accessible to BMC's employees and contractors. Management strategies and plans are also made publicly available via the BMC website:

newhopegroup.com.au/bengalla-mine/

Table 3
Environmental Management System Documents

Document Type	Purpose
Management Strategies	A strategy is a long-term plan to achieve business objectives.
Plans	Describes the objectives and how to achieve the desired outcomes.
Procedures	A sequence of activities, tasks, steps, decisions, calculations and processes, to produce an outcome.
Monitoring Programs	Describes the types, locations and timing of monitoring activities and the relevant criteria that may apply.
Other support documents	Provide additional tools for carrying out the system's requirements (e.g. manuals, forms, checklists, registers, work instructions)

3.2 Environmental Management Plans

Management plans (as modified) have been prepared in accordance with the relevant conditions of SSD-5170 (as modified). Management Plans outline the operational control which will be employed to enable compliance with the relevant conditions of approval.

Management plans also include monitoring programs which outline the framework for measuring and monitoring environmental performance. BMC operates monitoring networks which includes monitoring stations for aspects of environmental management including air quality, noise, water and blasting. The locations of monitoring stations at Bengalla are shown in **Appendix B**.

The environmental management plans that are implemented at Bengalla are listed in **Table 4**.

Table 4
Environmental Management Plans

Aspect	Management Plans
Air Quality	<ul style="list-style-type: none"> • Air Quality Management Plan
Noise	<ul style="list-style-type: none"> • Noise Management Plan
Water	<ul style="list-style-type: none"> • Water Management Plan
Blasting	<ul style="list-style-type: none"> • Blast Management Plan
Greenhouse Gas	<ul style="list-style-type: none"> • Air Quality Management Plan
Biodiversity	<ul style="list-style-type: none"> • Biodiversity Management Plan • Biodiversity Offset Management Plan
Rehabilitation	<ul style="list-style-type: none"> • Mining Operations Plan
Visual	<ul style="list-style-type: none"> • Visual Impact Mitigation Plan
Heritage	<ul style="list-style-type: none"> • Aboriginal Cultural Heritage Management Plan • Historic Heritage Management Plan

3.3 Procedures

Procedures have been established, documented and maintained for mining related activities. BMC procedures can be accessed by employees and contractors via Lotus Notes or other internal information databases.

4.0 IMPLEMENTATION AND OPERATION

4.1 Organisational Structure and Responsibilities for the Environment

The structure of the environment team at Bengalla is shown in **Figure 3**.

All employees and contractors working at Bengalla have specific accountabilities. All employees and contractors are accountable for:

- Complying with relevant legislation;
- Complying with the Environmental Management System to the extent that it applies to their work;
- Communicating any information that they become aware of in relation to environmental management; and
- Taking appropriate actions to mitigate environmental impacts, following consultation with relevant BMC environmental personnel.

Accountabilities for environmental management are defined in environmental management plans (see **Section 3.2**) so that personnel are aware of their roles and responsibilities.

The direct reporting structure for the environment team is through the Technical Services Manager, who reports to the General Manager.

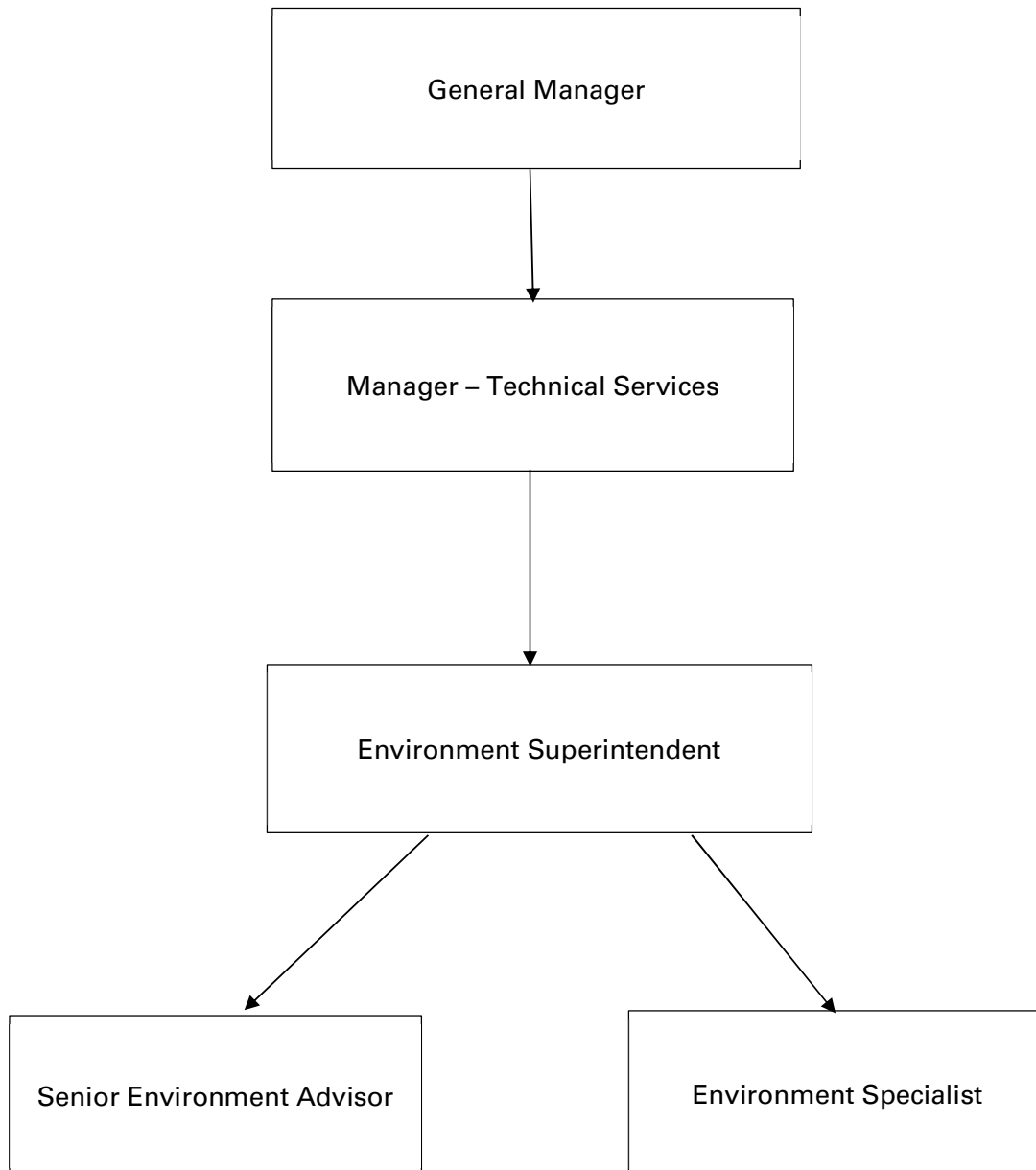
4.2 Training and Competency

BMC provides environmental training regarding regulatory compliance.

BMC requires all employees and contractors to undertake an induction, which provides environmental awareness training prior to commencing work on site.

- Environmental awareness equips personnel to: Effectively undertake their tasks in accordance with the relevant environmental procedures in order to prevent or minimise environmental impacts; and
- Recognise the environmental hazards associated with their specific work tasks, through a risk based assessment process.

Figure 3
BMC Environment Personnel



4.3 Communication and Consultation

4.3.1 Internal Communication

All employees and contractors are provided with information regarding the environment.

Environmental communication includes:

- This EMS;
- Plans and Procedures detailing objectives, management and monitoring measures;
- Environmental training;
- Site inductions; and
- Information about incidents.

4.3.2 External Communication

Bengalla aims to maintain good relationships with government agencies, other stakeholders and the local community. BMC's community liaison objectives are to:

- Ensure that Bengalla consistently builds upon its credibility within the region through a process of engagement and transparency within the neighbouring communities;
- Be proactive rather than reactive;
- Build awareness and provide information on current and future plans;
- Keep all stakeholders well informed;
- Establish working relationships with stakeholders;
- Address any concerns where appropriate, held by residents and other stakeholders; and
- Minimise any potential disruptions and inconvenience to residents and operations.

The processes for external communication between Bengalla and its stakeholders is summarised in **Table 5**.

Table 5
Processes for External Communication

Method of Communication	Frequency	Objectives
Contact with immediate neighbours – General Manager (or designated representative), Community Relations personnel and Environment representatives	Regularly	To notify neighbours on appropriate aspects of the operations, including new proposals and provide a mechanism for any concerns to be raised directly with mine personnel.
Near neighbour newsletter	Quarterly	To provide information on special interest topics and environmental programs.
Community Consultative Committee (constituted by members representing government, community and BMC)	As required under Schedule 5, Condition 6 of SSD-5170	To present information on site operations, initiatives and environmental performance, provide members with opportunity to request information from BMC and exchange of information on topical issues and matters of interest, including guest speakers.
Community open days	Periodically	To provide an opportunity for members of the community to see and experience a working coal mining operation, ask questions and be informed about BMC's operations.
24-hour Environmental Complaints Line	Ongoing	Receipt of community concerns.
General Inquiries Telephone Line	Ongoing	To provide a function for community engagement and receipt of messages after hours.
Bengalla website	Ongoing	To enable the community to readily access information on Bengalla and its performance
Annual Review	Annually	To provide regulatory authorities and the community with information on BMC's activities and environmental performance during the previous year.

4.3.3 Community Complaints

BMC has a Community Complaints Procedure which details how to receive, respond to, record and address community complaints. BMC management will continue to keep a record of all community complaints and subsequent actions. The following details are recorded (as a minimum):

- Complainant details (where provided);
- The nature of the complaint;
- How the complaint was made;
- Actions (if appropriate); and
- Consultation undertaken.

Complaints and enquiries regarding environmental matters are directed to the 24-hour complaints hotline: 1800 178 984. A register of complaints is published monthly on BMC's website in accordance with Schedule 5, Condition 11 of SSD-5170 (as modified).

4.3.4 Conflict Resolution

All conflicts between BMC and other stakeholders (if they arise) will be resolved in accordance with the conditions of SSD-5170 (as modified). In general, disputes with external stakeholders, which cannot be resolved by BMC, are referred to the Secretary of Department of Planning, Industry and Environment (DPIE).

Schedule 3 Condition 35 of SSD-5170 (as modified) states that if there is a dispute between BMC and Muswellbrook Shire Council and/or Transport for NSW regarding contributions to road upgrades and maintenance (other than the DPIE), the dispute shall be referred to the Secretary of DPIE.

Schedule 4 Condition 4 of SSD-5170 (as modified) provides that if an owner of privately-owned land considers Bengalla to be exceeding the relevant performance criteria in the development consent, they may ask the Secretary of the DPIE in writing for an independent review of the impacts of the development on their land. If such a review is requested, BMC will progress this review in accordance with Schedule 4 Condition 4 of SSD-5170 (as modified).

In accordance with Schedule 3 Condition 12 of SSD-5170 (as modified) BMC will commission a property investigation within 2 months of any claim from a property owner that blasting has resulted in damage to structures on their property.

4.3.5 Incidents and Non-compliances

BMC will immediately notify the Secretary of DPIE and any other relevant regulatory agencies of any Incident in accordance with Schedule 5 Condition 7 of SSD-5170 (as modified) (and the EPA in accordance with EPL 6538). Within seven days of the date of the incident, BMC will provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.

BMC will immediately notify the Secretary of DPIE and any other relevant regulatory agencies of any non-compliance in accordance with Schedule 5 Condition 7A of SSD-5170 (as modified) (and the EPA in accordance with EPL 6538). The notification must be in writing and identify the development and set out the location and nature of the incident.

4.3.6 Response to Emergencies

Bengalla has an Emergency Response Team which is trained to respond to emergencies. Simulated emergency exercises are conducted in order to measure and improve the effectiveness of emergency management. BMC maintains a Business Resilience & Recovery Management Program and various procedures to manage the risks associated with its operations.

Where risk assessments have identified potential emergency situations, specific documented procedures for dealing with those emergency situations are in place.

The Bengalla Pollution Incident Response Management Plan includes the following information:

- Initial and ongoing emergency notification to internal and external resources;
- Events and communication log;
- Documented accountabilities;
- Specific emergency situations;
- Critical incident stress management; and
- De-briefs to take place after any emergency situation.

The emergency procedures include accountabilities for dealing with other matters such as using outside assistance, dealing with media, counselling and community relations.

5.0 ABBREVIATIONS

Term	Definition
Bengalla	Bengalla Mine
BMC	Bengalla Mining Company Pty Limited
CHPP	Coal Handling and Preparation Plant
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EMS	Environmental Management Strategy
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	Environmental Protection Authority
EPL	Environmental Protection Licence
Incident	An occurrence or set of circumstances that cause or threatens to cause material harm and which may or may not be or cause a non-compliance
Material Harm	Material harm includes on-site harm, as well as harm to the environment beyond the premises where the pollution incident occurred (NSWEPA)
ML	Mining Lease
Mtpa	Million tonnes per annum
Non-compliance	An occurrence, det of circumstances or development that is a breach of the development consent
OEA	Overburden Emplacement Area
RL	Reduced Level
ROM	Run of Mine
RTS	Response to Submissions
SSD	State Significant Development

6.0 REFERENCES

Hansen Bailey (2013), *Continuation of Bengalla Mine Environmental Impact Statement*.

Hansen Bailey (2014), *Continuation of Bengalla Mine Response to Submissions*.

Statement of Environmental Effects titled "*Bengalla Mine Development Consent Modification Statement of Environmental Effects*" dated August 2015 and prepared by Hansen Bailey, including the Response to Submissions document dated October 2015.

Statement of Environmental Effects titled "*Bengalla Mine Development Consent Modification Statement of Environmental Effects*" dated April 2016 and prepared by Hansen Bailey, including the Response to Submissions document dated June 2016.

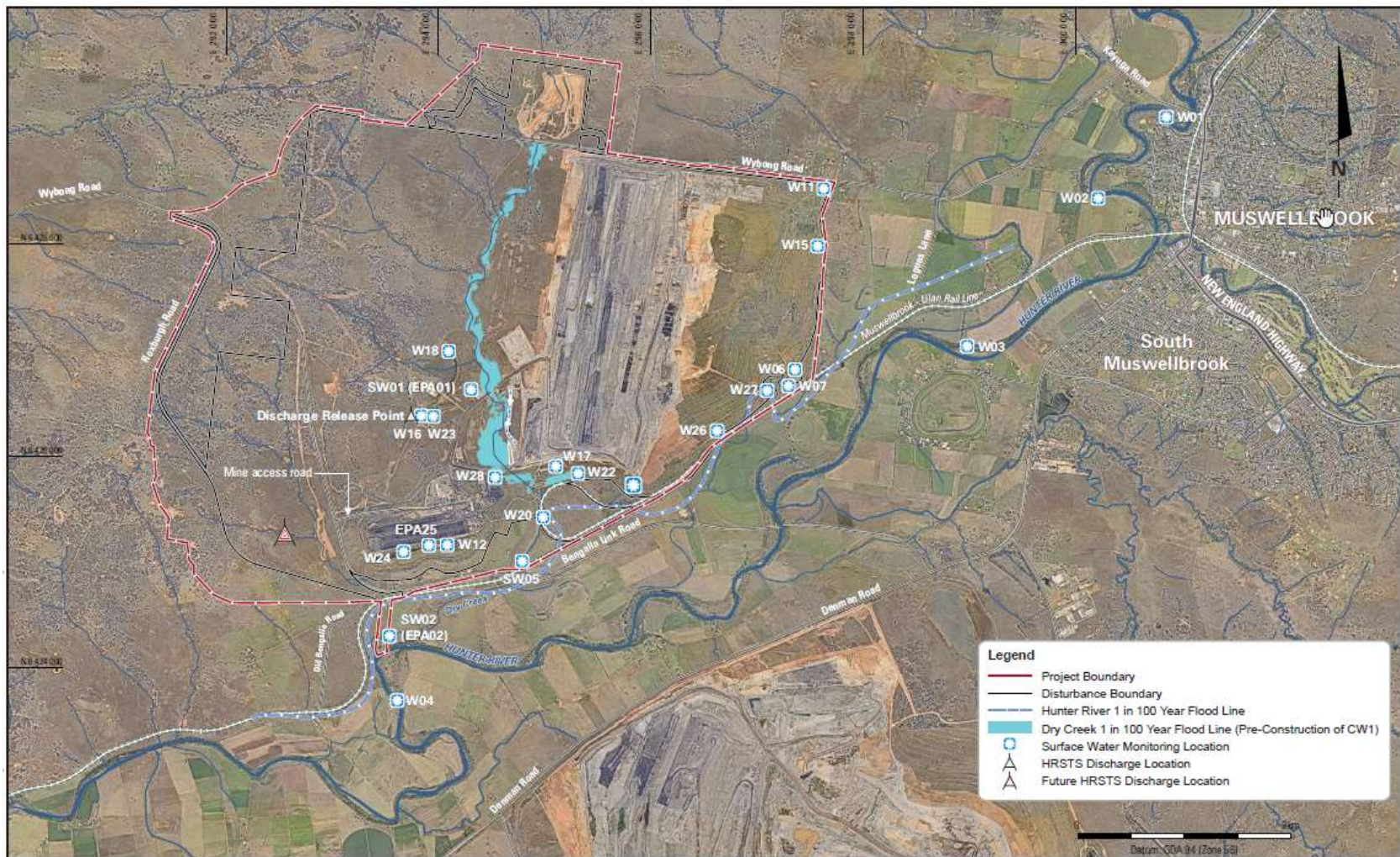
Statement of Environmental Effects titled "*Bengalla Mine Development Consent Modification 3 Statement of Environmental Effects*" dated September 2016 and prepared by Hansen Bailey, including the Response to Submissions document dated November 2016.

Statement of Environmental Effects titled "*Bengalla Mine Development Consent Modification 4 Statement of Environmental Effects*" dated December 2017 and prepared by Hansen Bailey, including the Response to Submissions document dated May 2018 and additional information dated July 2018 and November 2018.

HLA Envirosciences (1993), *Bengalla Mine Environmental Impact Statement*.

APPENDIX A
REGULATORY CORRESPONDENCE

APPENDIX B
ENVIRONMENTAL MONITORING NETWORK



BENGALLA MINE



Hansen Bailey
ENVIRONMENTAL CONSULTANTS

Existing Surface Water Monitoring Locations

