

Topic	Page	Recommendation	IC Response
AEMR	110	Weed control activities for each of the BSOP operation areas should be more specific in terms of outlining what weed species were targetted during which season and the control method (chemical, mechanical) applied.	Weed management will be undertaken as required - The NSW DPI Noxious and Environmental Weed Control Handbook will be used as a guidance tool. A summary of weed management activities will be provided in the AEMR.
AEMR	110	The AEMR could go further to outline specific tasks e.g. monitoring and research undertaken for the threatened species that are the subject of annual focus at the BSOP	More detail on monitoring and research undertaken for threatened species will be included in the FY14 AEMR.
AEMR	110	The activities outlind for the next AEMR period (Section 6) have ommitted key ecology and rehabilitation activities including, but not limited to weed control activities, Stage 3 rehabilitation works (planting/seeding and habitat restoration) and feral animal control activities.	More detail on key ecology and rehabilitation activities will be included in the FY14 AEMR.
AEMR	111	Future AEMRs should outline monitoring locations and results to provide a summary of the flora and fauna monitoring undertaken at the BSOP during the year.	The annual emplacement rehabilitation monitoring report has been included as an appendix to past AEMR's and will be provided in future AEMR's going forward. This document includes monitoring locations, methods etc. A summary of flora/fauna monitoring undertaken during the AEMR period will be provided in future AEMR's.
Air Quality Management	123	<p>Prioritise management and monitoring measures in accordance with air quality risks. At present, there are a range of areas where a comprehensive level of detail is provided for area/activities that are considered to represent a relatively low emission potential. An example of this is the management of air emissions from surface vehicles at Appin West. Current nominated control and monitoring measures include: outline vehicle maintenance regimes; Use of low emission diesel fuel; Periodic vehicle emissions testing; Occupational hygiene testing; health surveillance monitoring; routine maintenance and inspection of vehicles.</p> <p>For a facility of this scale at which intensive vehicle operations do not occur, there is a risk that the extent of these controls may draw attention away from key emission sources, whilst providing little or no improvement in air quality. A more targeted set of management measures for this emission source would be: Operation of on site plant and vehicles in a proper and efficient manner, including regular maintenance; Procurement of off-road plant/vehicles that meet the US EPA Tier 3 emission standard (or equivalent); and Use of low emission diesel fuel</p>	The air emission sources and management measures will be reviewed and updated accordingly during the next scheduled review of the AQMP.
Air Quality Management	123	Removal of duplication in the AQMP is recommended, with cross reference (to site-specific section) included if required. Duplication and crossover are noted on a range of areas within the AQMP, and should be minimized or removed where possible. For exmample in Table 6-1 of the AQMP, under 'transport of coal product on public roads' requirements including dust depositin/photometer monitoring, loading chute enclosure/gap, internal roadway spraying, wheel wash requirements are direct duplicates of measures covered under other areas (e.g. "Appin East Site).	Noted. Will be incorporated into the next review of the AQMP.
Air Quality Management	124	A more practical monitoring protocol should be established for the use of optical photometers. This protocol should be developed by a BSOP environmental officer after familiarisation with the monitoring instrument in a field situation, with contribution/review from an air quality specialist. Such a protocol should be concise in nature (e.g. largely dot points, 2-4 pages in length), and adress the following: Typical triggers for a survey event; instrument specification and relative calibrations; monitoring methodology - intrument siting (proximity, alignment), monitoring period, averaging period, particulate class (e.g. PM10 or TSP), statistics of interest; Threshold levels and response mechanisms; and Record keeping (e.g. sample log sheet);	Noted. Procedure will be developed accordingly.
Air Quality Management	124	Site inspection sheets should be attached to the AQMP	Site inspection sheets are maintained in the Illawarra Coal Document Management System.
Air Quality Management	124	Screening out of risks should not be included under "operational controls". If the emission source is not considered to be a potential riosk, then ideally it should be excluded from the table	Noted. Will be considered during the next review of the AQMP.

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Air Quality Management	124	Airbourne particulate matter monitoring is yet to commence at the West Cliff Colliery and Appin Mine. Monitoring equipment was in the process of being commissioned at the time of the audit. Proposed compliance monitoring is limited to one event per month when real time (optical measurements are greater than 80% of respective criteria). The proposed real time instrumentation is not considered to be of adequate precision for assessment of compliance against aquisition and project approval criteria. Should HVAS monitoring be required by the real time monitoring, then given the inherent scatter in dust monitoring results, the HVAS sampling frequency of one event per month over three months (i.e. 3 samples in total) is not considered adequate to make a meaningful comparison against the aquisition and project approval criteria. It is recommended where it is required to demonstrate compliance with PA 08_0150 criteria, that sampling be performed at a suitable frequency (e.g. 1 in 6 days), and to a method for which an Australian Standard is available. Additionally, monitors should be located in a manner that allow comparison against the criteria. At present should exceedances be measured at the monitoring location, it will be unclear whether they extend to residential or privately owned land beyond the location of the monitor (i.e. the locations at which the criteria apply).	IC does not propose to modify the current monitoring program and associated compliance assessment protocol. The current program was developed in consultation with the EPA.
Air Quality Management	124	The AQMP should include a specific protocol for establishing the contribution of the BSOP to total particulate matter levels for assessment against incremental criteria. Given the prescence of frequent exceedances due to regional events across NSW, this protocol would assist in diagnosing the cause of exceedances, and estimatingthe contribution from the BSOP under such conditions. This would typically involve identifying background monitoring data sources, as well as procedures for considering variability in real-time monitoring data in conjunction with wind direction influences.	Noted - Protocol for assessing compliance against the incremental criteria (compliance and aquisition) will be incorporated into the AQMP once sufficient real time data has been obtianed and evaluated.
Air Quality Management	124	The clear-sky angle of dust deposition gauges should be reviewed. As an example, dust deposition gauge AEDD15 was noted to be located in close proximity to plant foliage.	Noted. Review will be undertaken to assess the suitability of the current site positions.
Air Quality Management	125	Dust emissions were observed at Appin East from trucks approaching the loading point (prior to u trun). The source of this dust should be investigated and control measures identified. In addition, a timeframe should be nominated for the completion of the sealing of the central area (i.e. to allow effective sweeping and/or rinsing).	Noted
Air Quality Management	125	Weekly checklists (or similar) should include the inspection of (fabric) haul truck covers. Covers on some trucks were observed to be showing signs of wear that may impede their ability to prevent dust emissions.	Conditions of covers are included in the exsisting mechanical inspection program for the truck fleet. Targeted spot checks will be undertake to assess the condition of the truck covers.
Air Quality Management	125	Only one transfer water spray was observed at the West Cliff Colliery CHPP. It is recommended that the AQMP be reviewed and updated to consider the need for water sprays at all transfer points at the West Cliff CHPP.	A review will be undertaken for the need for sprays on conveyors and transfer points and AQMP will be updated accordingly.
Air Quality Management	125	Dust emissions were observed by the auditors at Appin West Waste facility. Appin West site management reported that plans were in place to seal (provide hardstand for) a larger area which would help to reduce dust from this location.	Noted. Dust emissions from the area will be evaulated if required improvements to this site area will be undertaken (pending capital availability). Currently road sprays are available as primary control.
Compliance Report	143	Recommended that upload dates be added to cover pages or the website so that compliance with publishing timeframes can be quickly and easily determined	The date on the report is the publish date.
Compliance Report	143	It is recommended that further information be provided concerning the individual components of each of the condition items for future reports to provide a clearer understanding on progress against the requirement	IC will provide more detail where necessary in future annual compliance reports.
Consent - Surface Water Discharges	142	As discussed with the EPA (miutes of meeting 6 march 2014), ICHPL to submit an EPL variation request based on recent monitoring data.	IC will continue to consult with the EPA regarding variations to the Licence.
Consent - Surrender of Consents and Approvals	142	Confirm with relevant agencies appropriate Approvals have been surrendered as per the requirements of Condition 8, Schedule 2.	Write to the Director General to advise surrender of approvals as required by Condition 2.8 of the Bulli Seam Operations Approval and Sections 75YA and 104A of the EP&A Act.

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Ecology and Rehabilitation	111	It is recommended that flora and fauna monitoring reporting include figures outlining survey locations, monitoring and rehabilitation issues and successes	Noted and will be taken into account for future monitoring reports.
Ecology and Rehabilitation	111	Electronic filing of correspondence relating to specific EPBC conditions should be saved in easy to locate folders. It is suggested that folders correspond with each EPBC condition item	Noted - Documents will be maintained in our document control system.
Ecology and Rehabilitation	111	Further information should be provided within the EPBC Annual Compliance Report on the individual components of each of the condition items for future reports to provide a clear understanding on progress.	IC will provide more detail where necessary in future annual compliance reports.
Ecology and Rehabilitation	111	Document upload dates should be provided on the BSOP/ICHPL website to allow for efficient condition compliance assessment where upload timeframes are required	All approved management plans have been published on the website as required by Schedule 6, Condition 11 of the Project Approval.
Ecology and Rehabilitation	111	ICHPL to develop and implement a weed management plan including non local native species and noxious weeds for WC Colliery and Appin BSOP areas. Species such as whiskey grass, Rhodes Grass, African Love Grass and Sharp Rush should be a focus at West Cliff Colliery for 2014 and beyond.	Weed management will be undertaken as required - The NSW DPI Noxious and Environmental Weed Control Handbook will be used as a guidance tool.
Ecology and Rehabilitation	111	ICHPL to develop and implement a Pest Species Management Plan for the control and management of feral animals such as foxes, cats and rabbits. The plan should be prepared in consultation with the Department of Primary Industries, OEH and the Sydney Catchment Authority.	We do not believe that such a management plan will add significant value. Our preference would be participation in regional vertebrate pest programs with National Parks & Wildlife Service and Sydney Catchment Authority. There would be very little benefit implementing a localised predator control program at West Cliff only as predators from surrounding areas would simply move in and re-occupy the site. In the past, we have contributed to pest management programs in the adjacent Dharawal State Conservation area and would continue to do so should a program be established.
Ecology and rehabilitation	111	ICHPL to include threatened biota information; such as protected areas on site and procedures for; SBB, BHS, Persoonia hirsuta, SSTF and other threatened biota found on site into site inductions	Core requirements are covered in the site environmental assessments. Permit to Work requirements are incorporated into the general inductions for each site. Permit to Disturb is part of the Permit to Work process.
Ecology and rehabilitation	112	Placement of artificial habitat, specifically tiles and/or metal, in a few areas on western facing rehabilitation areas within Stage 3 and eventually Stage 4 at West Cliff Colliery to provide optimal habitat for the Broad-headed Snake. Signage locations could be placed on nearby roadways where habitat is visible as an educational tool for workers and visitors.	Artificial habitat will be installed within identified areas of the emplacement rehabilitation in-line with the approved Emplacement and Broad-headed Snake Management Plans.
Ecology and rehabilitation	112	Provide educational signage for future guided site tours to indicate different planting timeframes and rehabilitation effort for each of the Stage 1, 2 and 3 emplacement areas.	We do not believe that signage is necessary; however, planting timeframes and rehab methods have been incorporated into the IC GIS system for future reference.
Ecology and Rehabilitation	142	It is recommended that Stage 1 and 2 rehabilitation areas be targeted and spot sprayed for weeds, particularly Rhodes Grass, African Love Grass.	Weed spraying is undertaken as required and a summary of the weed spraying activities is included in the AEMR.
Ecology and Rehabilitation	142	It is recommended that the planning for Stage 4 clearance and rehabilitation consider key learnings from Stage 2 and 3 rehabilitation works in terms of soil medium, land form shaping, use of endemic species, retention and use of coarse woody debris, creation of water soaks and lay out of rock outcrops where not already included in the relevant Emplacement Management Plan.	At this stage, the methodology used in Stage 2 and 3 will be adopted for Stage 4 as per the approved Emplacement Management Plan.
Environmental Management Strategy	45	Review and update the strategy to include targets for identified objectives	Targets will be incorporated where relevant.
Environmental Management Strategy	45	Reference the BSOP Pollution Incident Response Management Plan as a key document for emergency management	The PIRMP will be referenced in the EMS during the next scheduled update.
Environmental Management Strategy	45	Update Appendix 1 to reference Figures that have been prepared since the Strategy was approved	Appendix 1 will be updated accordingly during the next scheduled update of the EMS.
EPBC 2010/5350 - Condition 15 - Accurate Records Must be Maintained	143	Recommended that electric filing of correspondence concerning EPBC actions be saved in easy and accessible folders/locations that correspond with each EPBC condition item.	Noted - Correspondence will be maintained in our document control system.
EPL	143	Conduct a periodic broad analysis of potential pollutants in water, including those that are naturally occurring against ANZECC guidelines	IC will continue to monitor pollutants in accordance with the requirements of EPL2504.

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EPL	143	It is recommended that the time of the sample be included on the 14 day monitoring data spreadsheet for all monitoring locations. It is recommended that the contractor include the dates on which the sample was taken; the time at which the sample was collected; the point at which the sample was taken; and the name of the person who collected the sample on all COC's. This information should also be included on the field sheets.	We believe there is no benefit to adding the time to the 14 day monitoring report; however, we will progress the recommendations regarding recording the time the sample was taken on the relevant documentation.
EPL	143	Update the IC Surface Water Monitoring Audit Form to include an assessment of the sampling method as required by EPL 2504	Noted - Will be included as part of the next scheduled review of the audit form.
EPL	143	Ensure the BSOP telephone complaints line is clearly available on the ICHPL website	Illawarra Coal has discussed with BHP Billiton web owners. Changes to web formatting may be considered in the future.
EPL	143	Ensure back-up systems or processes are available to monitor discharge points where upgrade or maintenance works are being conducted.	Noted - Will be managed on a case-by-case basis.
EPL	143	Document the roles, responsibilities and process for deciding if an incident has the potential to cause environmental harm	Noted - To be incorporated into the next review of the PIRMP
EPL - Ecotox	142	Ensure the required units of measurement (i.e. IC or EC) are included on the Chain of Custody or another form of communication so that the laboratory is aware of the required endpoint.	Future Chain of Custody forms will include the required units of measurement as per EPL2504.
Gas Drainage Management Plan	51	Future gas drainage management plans should include an assessment of potential flare noise. If flare noise is not considered an issue justification for not conducting an assessment should be provided.	Noted.  Gas Drainage Management Plans are currently developed for West Cliff Longwalls 36-37 and Appin Longwalls 706-708 to address the requirements of the Bulli Seam Operations Approval (Schedule 4 Condition 21). Any future applications will explicitly address flaring activities as per recommendation.
Gas Drainage Management Plan	134	Given the number of flare noise complaints received from the Appin Gas Drainage Project Areas 7 and 9 and Appin ventilation shaft No.6 Projects future gas drainage Management Plans should include an assessment of potential flare noise. If flare noise is not considered an issue justification for not conducting an assessment should be provided.	Noted.  Gas Drainage Management Plans are currently developed for West Cliff Longwalls 36-37 and Appin Longwalls 706-708 to address the requirements of the Bulli Seam Operations Approval (Schedule 4 Condition 21). Future applications will explicitly address flaring activities as per recommendation.  It should be noted for this recommendation that flares are only operated to manage gas drained from Appin Area 9. This project was approved by the Department of Planning under approval 08_0256, which was issued prior to the Bulli Seam Operations approval. Flaring operations were commenced with a number of noise mitigation measures in place, with mitigation measures enhanced throughout the project based on investigation, consultation with the community, and BHPB IC's complaints management process.  No flaring has been undertaken for Appin Area 7 gas drainage operations as this gas reports to power plants for utilisation. There are no flaring activities associated with the Ventilation Shaft No.6 Project.
General Management Plan Recommendations	46	That integration between the strategy and the management plans be improved. Each plan should outline its strategic context in line with ICHPL/BHP Billitons EMS, Group Level Documents, Standards and other procedures	Noted.
General Management Plan Recommendations	46	That the structure of management plans be improved so as to highlight management actions that can be easily identified, implemented and audited against. This could include having a table or section listing all of the management/mitigation measures required as part of the plan.	Noted. Will be incorporated where appropriate.
General Management Plan Recommendations	47	Any revised management plans be submitted to the Director-General. Revised plans may not necessarily be required to be approved, however; submission of the plans will ensure that the Director-General has the most up-to-date documents on file and will have access to changes to environmental management practices for the BSOP.	Noted. Where required, updated management plans will be submitted to the Director-General.

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General Management Plan Recommendations	47	Where management plans have been submitted but have yet to be approved by the Director-General it is recommended that where practicable and where cost commitments are not considered excessive/prohibitive these plans be implemented until such time as formal approval and/or feedback is received from the Director-General.	Commitments made under management plans will be implemented following approval (not prior).
General Management Plan Recommendations	47	That environmental management related plans be updated to reflect current operations and incorporate the recommendations of this audit report. Where management plans are identified to require actions as per the above recommendations, a repeat recommendation has not been made in the table below to avoid duplication of recommendations.	Noted. Environmental management plans will be updated as required to reflect the current operations during the next scheduled review.
General Management Plan Recommendations	143	Clearly state how unpredicted impacts and their consequences are managed and those ongoing impacts are reduced to levels below relevant impact assessment criteria as quickly as possible.	Where relevant, management plans will be updated to make reference to the Illawarra Coal Event Reporting and Investigation Procedure which defines the process for managing this type of issue. Subsidence management plans account for unpredicted impacts through the use of TARPS and Contingency Plans.
General Management Plan Recommendations	143	It is recommended that management plans be reviewed and revised to: Define roles and responsibilities. Where specific control measures are stated it is recommended that roles be assigned	The management plans already define the roles and responsibilities specific to the governance and implementation of the plans. Illawarra Coal does not believe assigning roles to specific controls would add value.
Heritage Management Plan	50	Update the HMP to clearly identify roles and responsibilities for action items (i.e. who does what and when)	Update the HMP to clearly identify roles and responsibilities for action items (i.e. who does what and when) and send to Dept of Planning for re-approval.
Heritage Management Plan	50	Table 4 (pg.17) should be changed to read Condition 5(K) not Condition 25 (k) of Schedule 3 of PA 08_1050.	Update the HMP and send to Dept of Planning for re-approval.
Noise Management	134	It is recommended that BSOP personnel sign the BarnOwl calibration sheet to confirm they have been trained in calibration techniques. It is also suggested that the BarnOwl be calibrated by a NATA accredited laboratory and/or serviced by the manufacturer on an annual basis.	Noted. IC is developing a competency assessment for BarnOwl monitoring. Calibration will be incorporated into the assessment. The BSO noise management plan requires the BarnOwl be calibrated annually by a NATA accredited lab.
Noise Management	135	Include road traffic noise as a topic in environmental awareness training and record the training on the HSE skills matrix.	Road traffic noise awareness training would be distributed via site communications on an as needed basis
Noise Management	135	Review and update the BSO Environmental Noise Monitoring Procedure to include the process for calibrating the BarnOwl. Include the BarnOwl Calibration Record sheet as a formal attachment.	The Noise Monitoring Procedure has been updated to include the calibration process. The BarnOwl calibration record sheet will be attached to the procedure.
Noise Management Plan	134	A clear reference should be made in the noise management plan that noise issues and criteria associated with projects (e.g. Appin Area 9 Gas Drainage Project Area 7 and 9) are managed under separate management plans, i.e. the Gas Drainage Management Plan.	Noted - Will be incorporated into the next review of the Plan.
Noise Management Plan	134	Update the noise management plan to reflect the noise mitigation measures at changes to Appin Mine No.2 Ventilation shaft such as the noise barrier.	Noted - To be incorporated into the next review of the Plan
Noise Management Plan	135	Clearly identify which survey points correspond to which receiver numbers as stated in Table 1, Condition 1, Schedule 4 of PA 08_0150 to demonstrate compliance with noise criteria at each of the identified receivers.	Noted - To be incorporated into the next review of the Plan. The current monitoring stations provide an assessment of compliance at specific receivers (using the noise contour bands generated as part of the noise impact assessment).
Noise Management Plan	135	Clearly identify which survey points correspond to which receiver numbers as stated in Table 1, Condition 1, Schedule 4 of PA 08_0150 have made a complaint to demonstrate compliance with noise criteria at each of the identified receivers. Ensure site environmental personnel are made aware of the latest complaints concerning BSOP operations.	Noted - To be incorporated into the next review of the Plan. The current monitoring stations provide an assessment of compliance at specific receivers (using the noise contour bands generated as part of the noise impact assessment).
Noise Management Plan	135	Review and update the NMP to reference the BSO Environmental Noise Monitoring Procedure. In particular sections that refer to monitoring requirements.	Noted - To be incorporated into the next review of the Plan
Noise Management Plan	135	Review and update Section 6.2.2 (p.21) of the NMP to provide a specific timeframe to conduct a noise monitoring survey	Noted - To be incorporated into the next review of the Plan
Noise Management Plan	135	Review and update the NMP to define training requirements for BSOP personnel to conduct attended and real-time noise monitoring using the BarnOwl or handheld equipment should an external acoustic consultant not be used.	Noted - To be incorporated into the next review of the Plan

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PA 08_0150 - Schedule 2, Condition 12 - Operation of Plant and Equipment	142	It is recommended that the site conduct an audit of its compliance against AS1940, AS1596 and the Dangerous Goods Code. The audit should include the brine storage tank at Appin West Pit Top	The legal requirements associated with Dangerous Goods are managed through our legal compliance system (Tickit). Periodic audits are undertaken as deemed appropriate.
PA 08_0150 - Schedule 4 Condition 1 - Noise Impact Assessment Criteria	142	Implement a review process of noise monitoring data prior to uploading the 14 day monitoring report to the BHP Billiton website.	Noted
PA 08_0150 - Schedule 4 Condition 27 - Visual Amenity and Lighting	142	It is recommended that ICHPL conduct inspections of outdoor lighting to demonstrate it meets the requirements of AS4282 (INT) 1995 - Control of Obtrusive Effects of Outdoor Lighting.	Light emissions from operations will be assessed visually as part of the night time noise monitoring program.
PA 08_0150 - Schedule 4 Condition 28 - Waste	142	As already proposed by ICHPL, seal the access road and ring road to the waste sorting area to reduce the potential for dust emissions from unsealed ground at Appin West.	Noted. Dust emissions from the area will be evaluated if required improvements to this site area will be undertaken (pending capital availability). Currently road sprays are available as primary control.
PA 08_0150 - Schedule 4 Condition 29 - General Waste Recommendations	142	Ensure that the date of the audit is provided on the waste audit report. It is recommended that 1SAP tracking numbers are included against non-conformances to demonstrate the issues have been closed out. Used batteries should be stored in a dedicated storage area/container that provides cover and secondary containment.	Noted. Used battery strage will be reviwed and actioned accodngly.
Pollution Incident Response Management Plans	52	Update the PIRMP to reference and explain the interaction of overarching ICHPL management and any relevant GLD documents	PIRMP will be reviewed and reference will be made to relevant emergency response documentation.
Pollution Incident Response Management Plans	53	Provide details of the ranking system for determining the likelihood and materiality ratings provided in Appendix B.	Noted - To be incorporated into the next review of the Plan
Pollution Incident Response Management Plans	54	Ensure the PIRMP is tested at least every 12 months as stated in Section 4.3 of the plan	Noted
Service Boreholes Management Plan	51	Responsibilities detailed in section 4 (pp.3-4) of the plan should be clearly outlined in a separate section and/or table to ensure BSOP personnel understand their responsibilities and that those actions are implemented within required timeframes.	This has been completed
Service Boreholes Management Plan	51	An explanation of the legislative requirements outlined in Section 5.1 (p.5) and Section 8.1.0 (Pg.15) of the plan should be provided so their implications to the installation, operation and rehabilitation of boreholes are understood. As this is an overarching plan these lists should not be limiting.	Noted. Will consider in future applications.
Service Boreholes Management Plan	51	Update the plan to include timeframes for inspections of control measures during the operational and project completion phases. The plan only identifies a timeframe for weekly inspections of activities and operations to determine control measures are working during the construction phase.	Noted. Will consider in future applications.
Service Boreholes Management Plan	143	Provide a review period for the Service Borehole Management Plan.	The Bulli Seam Operations approval prescribes the review period for strategies, plans and programs in Schedule 6 Condition 5.
Site Inspection Recommendations	26	Remove signage to the former LDP2	This has been completed
Site Inspection Recommendations	26	Sediment dam should be monitored on a regular basis to ensure sediment does not build up and compromise the storage capacity	Noted. This will be monitored as per the quarterly inspections.
Site Inspection Recommendations	27	Leak at the top of the former man and materials shaft had been sealed with expanding foam - ICHPL to perform a screening calculation to assess if this leak is a potential significance to GHG emissions and to determine management measures	Leak will be investigated to determine the most appropriate action.
Site Observations	24	Concrete screed to thickening tanks at the wash plant should be inspected and repaired to prevent surface water ingress and maintain the integrity of the tanks base	Tank screed will be inspected to determine the most appropriate action.

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Site Observations	24	30000L above ground reagent tanks - include the bund to the two tanks on the weekly environmental inspection checklist to ensure that its integrity can be monitored over time	Noted. Bund will be added to the inspection checklist.
Site Observations	84	Signage for LDP20 be reinstated	Noted. Signage will be reinstated.
Site Observations	84	Appin West Brine storage tank - Review the adequacy of the bunding to the brine storage in conjunction with the AS1940 audit as recommended for PA 08_0150. condition 12, Schedule 2	Noted. Adequacy of bunding will be reviewed accordingly.
Site Observations	97	IO - The deflector screen adjacent to the brine loading area be extended to the full length of the pad in order to prevent future spills impacting adjacent soil.	The adequacy of the deflector screening will be reviewed accordingly.
Subsidence Management Plans	73	Ongoing environmental monitoring should be conducted as required by approved plans and reports.	Agreed
Subsidence Management Plans	73	ICHPL has allocated substantial resources, both in-house and consultant/contractor, to subsidence management. While it is probably not appropriate or practical to provide more than a general overview of these resources within the relatively high level SMP's, it may be useful to have available for internal use a brief document and organisation chart which summarises (down to field operations) the allocation of tasks and responsibilities to, and interfaces between, the various line managers and technical and field staff involved in subsidence management.	Extraction Plans required by the BSOP Consent have a section dedicated to outlining Roles and Responsibilities, including field staff - this approach will continue.
Surface Water Management Plan	90	Update the SWMP to reflect current operations in comparison to the predictions made in the EA. The site inspection identified minor elements of the water management system such as the cessation of discharging mine water to Brennan's Ck that had changed from those described in the SWMP. the update can be conducted during the scheduled review of the SWMP	Noted: SWMP will be updated accordingly as part of the next scheduled review.
Surface Water Management Plan	90	Update tables 3-2, 3-3 and 3-4 of the SWMP to reflect the current PRP requirements such as PRP 18 - Modification to Brennans Ck Dam offtake, PRP 19 and PRP20. These PRPs include current and future due dates for actions	Noted: SWMP will be updated accordingly as part of the next scheduled review.
Surface Water Management Plan	142	Review and update the Surface Water Management Plan to reflect the current operations of water management at the tree BSOP sites. It is recommended that a formal description of the monitoring process be developed. The document should describe the timing and methods used to gather monitoring data as well as the reporting required and include specific roles and responsibilities for those tasks. This will assist BSOP to reduce the reliance on specific site staff to operate an effective system.	Noted: SWMP will be updated accordingly as part of the next scheduled review.
Traffic Management Plan	48	Review and update the TMP to include the requirement to cover all vehicles that travel on public roads rather than just oversized loads.	Noted. Wording in management plan will be amended as required i.e. to include requirements for the haulage fleet.
Traffic Management Plan	48	Review and update the TMP and assign individual roles to responsibilities defined in Table 1	Table 1 in the TMP will be reviewed and updated accordingly.
Traffic Management Plan	48	Report on the performance of the TMP in the AEMR as stated in the TMP (section 8.1.1 (pg15)).	Noted.
Underground Coal Wash Emplacement Trial	142	It is recommended that ICHPL update the Director-General concerning the status of the underground Coal Wash Emplacement Trial and this condition. Communications with the Director-General should be documented.	IC is yet to receive feedback on the draft plan that was provided. We will re-engage the Dept. outlining our preferred Consent Condition.
Waste Management Plan	49	Include the requirements of EPL 2504 and how these will be managed.	Noted: WMP will be updated accordingly as part of the next scheduled review.
Waste Management Plan	49	Review and update the WMP and assign individual roles to responsibilities defined in Table 1.	Noted: WMP will be updated accordingly as part of the next scheduled review.
Waste Management Plan	49	Review and update the WMP to reflect the collection, review and reporting processes for waste data across the BSOP including the 1SAP spreadsheets for Appin Mine and West Cliff Colliery	Noted: WMP will be updated accordingly as part of the next scheduled review.
Waste Management Plan	49	Review and update the WMP to reflect waste avoidance, reduction, recycling objectives, initiatives or targets.	Noted: WMP will be updated accordingly as part of the next scheduled review.

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West Cliff Coal Wash Emplacement Area Management Plan incorporating the EPBC Coal Wash Emplacement Staging and Rehabilitation Plan	109	It is recommended that seed collection efforts to outline the source of the seed collection (locality) and by who collects the seed be defined in the WCP Emplacement Area Management Plan	Noted. Seed will be harvested from areas of land to be cleared for coal wash emplacement where possible (although some outside purchase or collection of seed may be required). This is summarised in the current plan and also includes a species list for revegetation at West Cliff.
West Cliff Coal Wash Emplacement Area Management Plan incorporating the EPBC Coal Wash Emplacement Staging and Rehabilitation Plan	109	It is recommended that the pre-clearance checklist (referenced section 7.1.1) be included in the appendices of the WCP Emplacement Area Management Plan	The checklist is part of the Permit to Disturb process and therefore does not need to be included as an appendix.
West Cliff Coal Wash Emplacement Area Management Plan incorporating the EPBC Coal Wash Emplacement Staging and Rehabilitation Plan	110	Update the plan to include a summary status of the various stages. An overview of the various stages (i.e. Stage 3 and Stage 4) and the status of these stages was not provided in the WCP Emplacement Area Management Plan.	Noted. Details will be incorporated into the West Cliff Emplacement Coal Wash Emplacement Area Management Plan for Stage 4.
West Cliff Coal Wash Emplacement Area Management Plan incorporating the EPBC Coal Wash Emplacement Staging and Rehabilitation Plan	110	Update Pg 15 of the WCP Emplacement Area Management Plan to correct the <i>Section Error! Reference not found</i> text	Noted. Details will be incorporated into the West Cliff Emplacement Coal Wash Emplacement Area Management Plan for Stage 4.
West Cliff Coal Wash Emplacement Area Management Plan incorporating the EPBC Coal Wash Emplacement Staging and Rehabilitation Plan	110	Define a timeframe for audits for the procedures maintained and implemented by the contract company employed to maintain the emplacement area (p.25 of the plan)	Noted. Details will be incorporated into the West Cliff Emplacement Coal Wash Emplacement Area Management Plan for Stage 4.
West Cliff Coal Wash Emplacement Area Management Plan incorporating the EPBC Coal Wash Emplacement Staging and Rehabilitation Plan	143	Review and update Figure 11 to clearly show a 100m habitat corridor	Figure 11 already shows the 100m habitat corridor.