25 June 2018

Secretary
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Katrina O'Reilly
Team Leader- Compliance

Dear Katrina,

Tahmoor Coking Coal
Submission of Independent Environmental Audit Report

We refer to Tahmoor Coking Coal Operation's (TCCO) s Development Consent DA67-98 and, specifically, Condition 50 that requires an Independent Environmental Audit.

An Independent Audit of the development has been completed by SLR Consulting and an electronic (PDF) copy is enclosed with this covering letter for your file reference Table 1 below outlines the recommendations from SLR Consulting and the associated comments/ actions from TCCO. TCCO will manage the actions outlined within Table 1 and will report back to the Department of Planning & Environment on completion of each action.

The next Independent Environmental Audit is scheduled for September 2020.

If you have any questions regarding this report please don't hesitate to contact me on 0437 266 998 or ron.bush@glencore.com.au.

Yours sincerely,

Ron Bush

Environment and Community Manager

Table 1: SLR Consulting Recommendations with Comments from Tahmoor Coking Coal

Ref	Description	Risk	Tahmoor Coking Coal Comment/Action	Timing
DA67/98				
44	REC 1 b) Recommend including NMP statutory requirements in NMP, and including MP requirement in the NMP and the AQGHGMP. Also recommend including measures to monitor and report on the effectiveness of management measures in the NMP. e) Recommend TARP is attached the NMP & AQGHGMP, instead of being separate. g) Recommend including protocol for incidents, non-compliances and exceedances of criteria in the NMP. Also recommend on expanding on incidents, non-compliances and exceedances in the AQGHGMP.	**Administrative**	Tahmoor Coking Coal will implement these changes in the next review	June 2018

	The entire Air Quality Monitoring Plan should be attached to the AQGHGMP.			
45	REC 2 • Include water quality results from previous years in future Annual Reviews. • Include comparisons against predictions of the EA for water quality in future Annual Reviews. • Provide trends for all data, not just dust, in future Annual Reviews. • Identify discrepancies between the predicted and actual impacts for water quality, in future Annual Reviews. • Progress in respect of rehabilitation completion criteria needs to be reported in future Annual Reviews. • Future Annual Reviews should report discharge volumes in accordance with Section 7 of the Annual Review Guideline, dated October 2015. • Future Annual Reviews should include a summary of the rehabilitation performance of the operation against the rehabilitation targets in the MOP in accordance with Section 8 of the Annual Review Guideline, dated October 2015 • Future Annual Reviews should include a summary of non-compliances in Section 11, in accordance with Section 8 of the Annual Review Guideline, dated October 2015.	**Administrative**	A number of these actions were implemented in the 2018 Annual Review. All others will be implemented in the 2019 Annual Review.	March 2019

	Future Annual Reviews should include in Section 12 a timeline for implementation of measures, whether any management plans will need to be revised to reflect the measures to be implemented and any actions resulting from a condition of a relevant approval that will be triggered in the next reporting period in accordance with Section 8 of the Annual Review Guideline, dated October 2015. Additional subsidence reporting as per recommendations from DGS Report (Section 7.2)			
46	REC 3 • Ensure that relevant Management Plans are revised after an audit report is submitted. • Ensure relevant Management Plans are revised after receiving a directive (incident report) from DRG.	**Administrative**	Review of Management Plans is to be complete by 30 June. This will be in line with the requirement to review within 3 months of the Annual Review, Independent Audit Submission and Directive from the Resource Regulator.	June 2018
DA57/93				
41	REC 4 • Continue to monitor grass planting trials at the Reject Emplacement Area where the survival and growth of planted grass species in areas where the existing vegetation (within revegetation areas) was sparse. • Undertake a grass seed mix trial, looking at increasing the diversity of grass seed mix in areas where groundcover is sparse.	**Non – Compliant (Low Risk)**	Contour Drains have been constructed in line with the Cardno Drawing. All other actions will be completed by December 2018.	December 2018

	• The review of the Reject Emplacement Area Management Plan should be completed and the Plan updated as required. The plan is now potentially out of date due to the age. • Topsoil stockpiles resulting from future disturbance should be 3m high and be seeded with a temporary vegetation cover. • Ensure future contour drains and other water management structures at the REA are constructed in accordance with approved designs.			
EPL1389				
L2	REC 5 Recommend testing in two locations at the dam (M4), with this being the last dam prior to discharging to LDP 1. Recommend testing for a period of six months at a monitoring location close to the discharge point and one adjacent to the flocculation area. This will determine if the Flocculent is fully mixing across the dam.	**Non – Compliant (Low Risk)**	Tahmoor Coking Coal will implement additional monitoring point as per this recommendation.	July 2018
LW 27 – 30 Subsidence Management Plan				
2	REC 6 • Ensure CMA Plan is implemented when required in the future. • Implement agreed actions relating to rehabilitation of Myrtle Creek and Redbank Creek based on DRG feedback.	**Non – Compliance (Medium Risk)**	Tahmoor Coking Coal is committed to completing the CMAP as per the timeline that is submitted to the Resource Regulator. Timeline is due in August 2018. .	August 2018

ML1539				
57	REC 7 Tahmoor Coking Coal Operations must ensure that prior to the commencement of "second working" extraction they give three (3) months written notice to landowners.	**Administrative Non - Compliance**	Tahmoor Coking Coal is aware of this commitment and currently preparing LW32 notification.	June 2018
CCL716				
30	REC 8 For any future topsoil stockpiles, they should be shaped to be less than 3m in height.	**Non – Compliance (Low Risk)**	Tahmoor Coking Coal will implement a 3m guide post to assist with ensuring stockpiles are in line with the height requirements.	December 2018
Other Recommendations				
NA	REC 9: • Add MOP to the website as it is an approved plan. It is important document as it can easily be determined where mining will be in the community. • The Heritage Management Plans developed for the different SMP's should be included on the website. • The SMP Written Report should be included on the website as it gives a good summary of proposed mining operations. • Any specific Environmental Management Plans that were developed for the SMP's should be on the website.	**NA**	Tahmoor Coking Coal will update the website with required documents.	July 2018

	• Include latest version of the AQGHGMP on the website.			
NA	REC 10 • Discuss the statutory requirements relating to the Noise Management Plan. Including this condition and any other relevant noise conditions consents. • Prepare a cross referencing table.	**NA**	The Noise Management Plan will be updated with a table cross-referencing noise conditions.	June 2018
NA	REC 11 Separate the classification of incidents versus areas of identified improvement at site. Some of the areas classified within the Glencore database as an incident are just areas of improvement (eg. removal of tree from a road). It should be clearly defined within the Glencore database about which incidents are reportable versus non-reportable incidents.	**NA**	The CMO system currently has a section whereby incidents are classified as reportable. In the 2019 Annual Review actions will be differentiated based on whether they are reportable.	March 2019
NA	REC 12 • There needs to be a mechanism on the sewerage treatment system to measure discharge. SLR recommends an accurate a meter system. • Current system is potentially inaccurate and likely overestimates usage. • Recommend that remedial works are continued on the WWTP by the supplier to bring the plant back into full operation.	**NA**	Tahmoor Coking Coal will install a flow meter on the entrance to the sewage plant.	September 2018

NA	REC 13 Include a figure in the Annual Review outlining the consent boundaries, mining lease boundaries and the EPL boundary. The current figure in the Annual Review only outlines the mining lease boundaries.	**NA**	Tahmoor Coking Coal will include Consent Boundaries and EPL Boundary in the 2019 Annual Review	March 2019
NA	REC 14 Recommend reporting discharge volumes in Annual Reviews in accordance with Section 7 of the Oct 2015 Annual Review Guidelines.	**NA**	Tahmoor Coking Coal will report on water discharge volumes in the 2019 Annual Review	March 2019
NA	REC 15 Recommend that plans are developed to remove/recycle waste material (old parts etc) from the site.	**NA**	Tahmoor Coking Coal currently has a Waste Management Plan. The contract associated with waste is currently being reviewed. Tahmoor will review this procedure with the new contractor to ensure the best outcomes are obtained.	September 2018
NA	Next version of the MOP document needs to be revised to reflect latest version of the guidelines (ESG3: Mining Operations Plan (MOP) Guidelines, dated September 2013	**NA**	The MOP requires review in 2019. This will be as per the new guidelines.	September 2019