

Duralie Coal Mine - Rail Haulage Audit December 2013
Response to Recommendations

**Final report completed by 31-Dec-13.*

**Final report with response to recommendations to be provided to DoPI within 6 week of completing audit.*

**Note that the content of recommendations provided in this section are advisory and require further investigation and consideration.*

Section 1 - Logistics

Condition	Observation/Recommendation	Responsible Persons	Due Date	Completion Date	Comment/Response
Condition 8, Schedule 3. The Proponent shall:					
a) only dispatch shuttle trains from the site between 6am and 10pm;	It is recommended that the requirement that no train departs the site before 6am is reinforced with Aurizon staff.	Simon Budden	31-Dec-13	20-Dec-13	This action has been completed and was confirmed by email from Aurizon on 20 December 2013.
Condition 48, Schedule 3. The Proponent shall keep accurate records of:					
(b) the: number of train movements to and from the site each day; date and time of each train movement to the site between 10pm and midnight; and instances when the shuttle train is operated on the North Coast railway between midnight and 1am in exceptional circumstances. Make these records publically available on its website on a fortnightly basis.	It is recommended that DCPL review its procedures for posting of train performance data on its website to ensure that this information is made available consistently on a fortnightly basis.	Simon Budden	31-Dec-13	6-Dec-13	This action has been addressed and measures have been taken to ensure fortnightly update of train data.
Condition 9A(b), Schedule 5. The Conditions of Approval permit the dispatch of trains from Duralie until 10pm. However, the audit is required to consider the dispatch of trains from the site between 9.25pm and 1am the following day and to recommend appropriate measures or actions to improve the efficiency of these rail haulage operations and minimise their associated impacts.	Over the period analysed a total of 13 train movements are recorded where the train has departed Duralie after 9:25. Given this limited number of movements, it appears possible to transport the same amount of coal yet avoid any departures after 9:25 by instituting more movements on a Saturday. It is recommended that this issue be investigated by DCPL, Aurizon and ARTC to determine if it is feasible to reduce or eliminate dispatch of trains after 9.25pm.	Simon Budden	31-Jan-14	21-Jan-13	The review period of this audit was during one of DCPL's lower railed coal periods. When DCPL rail an increased tonnage the use of Saturdays will be required to reach this output. Our current manning structure of the Duralie CHP and the Stratford CHPP does not currently allow for consistent operation of shuttle on Saturdays. Therefore using Saturdays in place of operating after 9:25pm is not viable. Also the 13 trains represents approx 5% of weekdays (exclude public holidays) that the train operated after 9:25pm. This is not statistically significant enough to warrant such a structural shift in shuttle operations to use Saturdays instead. Additionally, Wilkinson Murray's report states if reduced night time movements were to be considered by increasing movements on weekends, this should be done carefully in consultation with the community as there might be a community preference of having less weekend movements. Review undertaken and recommendation will not be pursued.
General	The shuttle train operation appears well managed however there appears to be a lack of formal documentation on the processes to be adopted. It is recommended that the process is formalised and a Shuttle Train Management Plan put in place, which would assist to ensure a consistent approach is taken regardless of individual staff and would demonstrate management oversight and governance.	Simon Budden	31-Jun-14		DCPL will collate existing protocols and formalise standard procedures to meet the audit recommendation. This will require consultation between DCPL and Aurizon.

Other:					
Stratford Coal Mine Condition 6, Schedule 3 of the Development Consent states that the Stratford rail loop must only be occupied simultaneously by two trains at night no more than 25 times in a calendar year from the start of 2014, and no more than once a week.	It is recommended that some level of coordination be put in place between the Duralie shuttle train and the Stratford export train, to ensure compliance with this Condition of Operation at Stratford and to potentially eliminate inefficiencies in the operation of the shuttle train.	Simon Budden	31-Jan-14	31-Jan-14	In 2012 DCPL engaged both HVCCC and ARTC regarding co-ordination of the shuttle train into the export train pathing. Several meetings were held and it involved the GM of logistics for our company who at the time was on the board of NCIG. Progress was made until the last approval by the head of ARTC did not proceed. All of this work to improve co-ordination now cannot proceed as the senior levels of ARTC will not allow control of the north coast line to go to HVCCC. So after 18 months of meetings, lobbying and constructive work we are now at the limit of co-ordination we can expect. DCPL will continue to work with ARTC and HVCC to minimise inefficiencies in the operation of the shuttle train and meet SCM Condition 6, Schedule 3.

Section 2 - Noise

Condition	Observation/Recommendation	Responsible Persons	Due Date	Completion Date	Comment/Response
Condition 2c, Schedule 4 (i.e. notify the relevant owner in writing that they are entitled to ask for additional noise mitigation measures to be installed at their residence).	It is recommended that rail noise compliance levels are validated to confirm the extent of any exceedance of the LAmx 85 dBA pass-by criterion.	Michael Plain	31-Jan-14	31-Jan-14	Rail noise receivers R2 and R4-R12 have been addressed in accordance with the Consultation Plan required under Condition 1A Schedule 4, i.e. notification has been provided to the relevant owner in writing that they are entitled to ask for additional noise mitigation measures to be installed at their residence and follow-up of any requests received to undertake such works. Of the remaining rail noise receivers where an exceedance of the LAmx 85 dBA pass-by criterion has been recorded the residence has either been mine owned or the exceedance has been less than 2dB over the pass-by criteria and would not constitute an exceedance in accordance with the NSW Industrial Noise Policy Section 11.1.3. Rail noise monitoring results will continue to be validated to confirm any exceedance of the licence criteria in the quarterly noise reports.

Section 3 - Air Quality

Condition	Observation/Recommendation	Responsible Persons	Due Date	Completion Date	Comment/Response
Condition 9A(b), Schedule 5. Review the existing rail haulage operations to determine whether all reasonable and feasible measures are being implemented to minimise the; dust impacts of these operations.	All reasonable and feasible measures were observed to be applied. No changes to operational practices are required provided that; regular inspections are recorded/documentated by the mine to confirm that it is maintaining its existing controls and practices into the future, i.e. water sprays operational, no coal build up on wagons. (For example, this could be a visual check or photo per a simple check off list), and if any issue be found during a regular inspection, it should be promptly rectified, and the solution documented.)	Simon Budden	28-Mar-14		DCPL will review the current inspection checklists to ensure these items have been considered.