

Duralie Coal Mine - Independent Environmental Audit 2014
Response to Recommendations

Recommendations				
Audit report reference	Management area	Audit Recommendation	Duralie Coal Response (Original February 2015)	Status Update January 2017
4.2.4.1	Noise management	Recommendation N1: The Vipac Quarterly Environmental Noise Survey reports do not contain assessment of low frequency noise emissions in accordance with the Industrial Noise Policy. It is recommended that low frequency noise emissions should be assessed in the quarterly reports to satisfy Condition L4.5 of EPL 11701.	Duralie Coal Mine undertakes its monitoring in accordance with the INP. The Duralie Modification Environmental Assessment included a low frequency analysis of C and A weighted intrusive noise levels in accordance with INP requirements which indicated that there is no dominant low-frequency content relating to noise emissions from Duralie Coal Mine. DCM will continue to consult with the EPA and DP&E as part of future revisions of the Noise Management Plan with consideration to low frequency assessment.	Completed. The DCM Noise Management Plan was update and approved by DP&E on 7 March 2016. The quarterly attended noise monitoring reports include an assessment of low frequency noise. A low frequency noise assessment is only undertaken when the target specific mine noise is deemed to be the dominant noise source in accordance with the INP Section 4. If the mine noise is deemed to be the dominant source an analysis of C and A weighted noise levels is undertaken to determine if the modifying factor should be applied.
4.2.4.1	Noise management	Recommendation N2: It is recommended that to incorporate the low frequency assessment into the current noise monitoring report format analysis results should be changed on the left hand side of the graphical representation to the following, in order: Total Leq dB(A) Mine contribution Leq dB(A) Mine contribution Leq dB(C) Mine dB(C) – dB(A) Mine contribution L1 (night time only).	As above.	Completed. The C and A weighted assessment is included in the noise reports if the mine contribution is deemed to be the dominant source. Noise reports are available on the Duralie Coal website.
4.2.4.2	Noise management	Recommendation N3: It is recommended that the inversion data since commissioning of the real-time capability be analysed to determine the 90th percentile site-specific inversion strength in accordance with provisions in the INP. A summary report should then be forwarded to EPA/OEH for their consideration of reviewing the applicable inversion strength in EPL 11701. Incorporation of the site-specific value in the EPL would then necessitate changes to the real-time noise management triggers.	DCPL fulfils its obligations listed under the Statement of Commitments of Direct Temperature Inversion Management within Appendix 9 of the Duralie Coal Project Approval 08_0203 and EPL11701 conditions 4.9 and M5. DCPL will continue to provide for real-time measurement of temperature lapse rate in accordance with the Industrial Noise Policy and also review inversion data to interpret the 90th percentile inversion strength in line with the INP provisions. Additionally, correlation between the measured and calculated inversion strengths will continue to be included in the noise survey reports.	Direct temperature inversion monitoring continues to be undertaken at Duralie. The inversion strength would be assessed in the quarterly noise monitoring reports where there is an exceedence of the noise criteria in accordance with the NMP Section 7.2.4 Compliance Assessment Protocol.
4.2.8	Noise management	Recommendation N4: It is recommended the unattended logger surveys (typically 72 hour) be discontinued.	Duralie Coal accepts the recommendation.	Completed. The DCM Noise Management Plan was update and approved by DP&E on 7 March 2016. Unattended logger surveys have been removed from Section 7.
4.2.8	Noise management	Recommendation N5: It is recommended to discontinue including model results in compliance reports.	Duralie Coal accepts the recommendation.	Completed. The DCM Noise Management Plan was update and approved by DP&E on 7 March 2016. Modelled results are no longer reported in the compliance reports.
4.11.8	Biodiversity	Recommendation B1: It is recommended that consultation between Duralie Coal Pty Ltd and the OEH should be undertaken to address the concerns expressed by OEH. The amendments to the survey design of the Giant Barred Frog Study are described in the Annual Giant Barred Frog Study Reports 2011 to 2014 prepared by Biosphere Environmental Consultants (Dr Arthur White). Any consultation with the OEH in relation to survey transects should include Dr Arthur White who was endorsed by DP&I in March 2012 as a qualified and experienced person for the preparation of the Giant Barred Frog Study and Giant Barred Frog Management Plan in accordance with Project Approval 08_0203 Schedule 3 conditions 30 and 32. The two documents, were approved in March 2012 and annual reports of the monitoring results were submitted to the OEH and DPI. The discussion with OEH related to statistical analysis and methodology of the population data should include Dr Ian Lenane to ensure clarification of issues and discussion of consistency of approach.	Duralie Coal accepts the recommendation and will consult accordingly.	DCPL prepared a revision the Giant Barred Frog Management Plan with assistance from Dr Arthur White in 2015. The revised GBFMP was approved by DP&E on 17 December 2015 and by DotE on 4 January 2016. The revised GBFMP was provided to OEH and is available on the Duralie Coal website.
4.16	Rehabilitation	Recommendation R1: It is recommended that final landform design remains generally consistent within the limitations of the maximum height of the waste overburden emplacements (i.e. 135 m AHD approved 5 December 2014) and include some visible relief (+/- 20m RL) to provide a more natural skyline on the completed rehabilitation areas. The final slope of the overburden emplacement should adopt a concave profile (rather than batters and benches) where practicable to manage surface runoff and reduce potential erosion risk on the completed areas.	DCPL have an approved Rehabilitation Management Plan which currently commits to assessing the incorporation of a concave profile where practicable. The rehabilitation approach and strategy was also assessed within the Duralie Extension Project Modification and outlines DCPL's approach to waste emplacement shaping. Assessment of visible relief options on final landforms will be undertaken in consultation with DRE and DP&E during the revision of respective documents.	The DCM Rehabilitation Management Plan was updated and accepted by DRE on 21 October 2016. The RMP was revised to ensure consistency with the Mining Operations Plan following advise from DRE. The audit recommendation is addressed in the RMP Section 5.4.
4.12.3.2	Heritage	Recommendation H1: It is recommended that the maintenance program for the former Weismantel Inn European heritage site including any special requirements of the tenancy be described in the Heritage Management Plan.	Duralie Coal accepts this recommendation.	The DCM Heritage Management Plan was revised and approved by DP&E on 23 June 2015. The HMP Section 6.2 states "Weismantel's Inn is managed under the standard agency agreement for residential properties. This includes routine inspections of roofs, gutters, building damage such as water ingress, pest inspections and any other matters. No specific tenancy requirements beyond standard NSW tenancy requirements are required for the Former Weismantel's Inn."