

Airly Mine Response to Auditor's Recommendations – May 2015.

As required under Schedule 2 Condition 44 of of Airly Coal Mine – Life of Consent (DA162/91 MOD 3), Table 1 below provides a response to the recommendations outlined in the 2015 Independent Environmental Audit Report.

Table 1: Airly Mine Response to Auditor's Recommendations – May 2015.

Condition	Description	Risk	Airly Mine Response
DA 162/91 Schedule 2, Condition 13(b)	Airly management reported that they are in the process of preparing a Draft Extraction Management Plan; however, the draft plan was not in a condition to be provided to the auditors for review at the time of the audit. Given the Draft Extraction Plan was not available for review this condition was found to be indeterminate	Low	Noted. The Extraction Plan has been submitted to the Department of Planning and Environment for approval.
DA 162/91 Schedule 2, Condition 20	Update the 2011 Surface Water Management Plan to reflect current Licenced Discharge Points and water management infrastructure and monitoring requirements or submit the draft Surface Water Monitoring and Management Plan to the Secretary for approval.	Low	Airly Mine will review, update and submit the management plan to the relevant government agencies for review and comment.

Condition	Description	Risk	Airly Mine Response
DA 162/91 Schedule 2, Condition 36	<p>Ensure the procedure(s) for managing non-compliances are included in the next revision/update of the Strategy. The Strategy be updated to:</p> <ul style="list-style-type: none"> - Better reflect the rehabilitation and weed management strategies - Provide an overview of measuring rehabilitation performance against closure criteria – or refer to the Closure Plan and/or MOP once developed. - Define an environmental hazards reporting approach as a means of developing a culture of reporting all issues and providing a leading indicator for environmental management/performance. 	Low	The recommendation will be considered during the review and update of the Environmental Management Strategy at Airly Mine.
DA 162/91 Schedule 2, Condition 38	<p>Implement the Draft Surface Water Monitoring Management and Draft Groundwater Water Monitoring Management Plan until the Airly Extension Project is determined.</p> <p>Update the legislation sections of the Draft Surface Water Monitoring Management and the Draft Groundwater Water Monitoring Management Plan to include references to the Development Consent, EPL and any other licence or permits should approval for the Airly Extension Project be granted.</p>	Low	Airly Mine will review, update and submit management plans to the relevant government agencies for review and comment.
DA 162/91 Statement of Commitments Condition 10	Confirm that the disused airfield had been removed from the latest topographic map for the area.	Administrative	Consult with the Department of Lands to confirm that the disused airfield had been removed from the latest topographic map for the area.
EPL 12374 L2.1	Consider investigating options to reduce the potential for discharges at LDP3 or review monitoring data to demonstrate that discharges at LDP3 do not impact downstream waters.	Low	Noted. Review the management of water captured in the Train Loader Dam (LDP3) in the Surface Water Management Plan.

Condition	Description	Risk	Airly Mine Response
EPL 12374 O1.1	Improve hydrocarbon management at the Workshop and laydown area including addressing spills from the workshop concrete slab and compressor areas (such as with secondary containment); as well as provision of sumps and hardstand for plant maintenance to reduce the potential for hydrocarbon impacts to the underlying soil.	Low	The area of concrete hardstand will be expanded at the workshop to improve the management of hydrocarbons.
ML 1331 Condition 3(c)	Revise and update the MOP to include all requirements of the ESG3; Mining Operations Plan (MOP) Guidelines September 2013	Low	The recommendation will be considered during the next revision and update of the Mining Operations Plan at Airly Mine.
Management Plans	Consideration should be given to providing the Draft Surface Water Monitoring and Management Plan (AIR-MP-3091) and Draft Groundwater Monitoring and Management Plan (AIR-MP-3090) to government agencies for review and comment prior to submission to NSW DP&E.	Low	Airly Mine will review, update and submit management plans to the relevant government agencies for review and comment.
Management Plans	Ensure document control requirements are included and completed on management plans.	Administrative	Noted
Management Plans	That the structure of current management plans be improved so as to highlight management actions and mitigation measures 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.	Administrative	Noted
Management Plans	That integration between the EMS and the management plans is improved. Each plan should outline its strategic context in line with Airly's EMS and Centennial Coal's Standards.	Administrative	Noted
Landscape/Rehabilitation Management Plan	Remove the 2009 Landscape and Rehabilitation Management Plan from the Airly Environmental Management System as it relates to works from the original commencement of the mine that are now not applicable.	Administrative	The 2009 Landscape and Rehabilitation Management Plan will be deleted as a controlled document component of the Environmental Management System at Airly Mine.

Condition	Description	Risk	Airly Mine Response
Pollution Incident Response Management Plan	Ensure the Plans appended to the PIRMP clearly and legibly show the location of potential pollutants on the premises. Best practice is to colour these locations differently from others so that they stand out.	Administrative	The recommendation will be considered during the next revision and update of the PIRMP at Airly Mine.
Site Observation	Conduct regular inspections of access roads on Mt Genowlan and Mt Airly and inform NSW National Parks when potential issues are identified. Ensure communications with NSW National Parks are documented.	Low	The condition of the tracks used to access exploration drill sites on Mt Genowlan and Mt Airly will be included in drill site inspections and communication undertaken with NSW National Parks will include the condition of these tracks.
Site Observation	Ensure that adequate weed control is undertaken at the Airly Village in cleared areas. Some weeds were observed during the site inspection on pasture areas.	Low	The control of weeds will continue to be undertaken over the operational areas at Airly Mine.