

BAAL BONE COLLIERY

(A MEMBER OF OAKBRIDGE COAL DIVISION)



OPERATED BY THE WALLERAWANG COLLIERIES LTD

2011 Independent Environmental Audit Action Plan

Managed by



Table 1: Baal Bone 2011 Independent Audit Action Plan - Summary

Item	Action Plan	Target Date of Completion
Noise Management Plan	A review of the Noise Management Plan and implementation of the plan, will conducted as part of the annual review of the Baal Bone Environmental Management System (EMS).	June 2012 (EMS Review)
Water Management Plan and associated sub plans	<p>Baal Bone will finalise and implement the Water Management Plan and all associated sub-plans:</p> <ul style="list-style-type: none"> • a detailed Site Water Balance; • the Ben Bullen Creek Natural Channel Design and Restoration Plan; • an Erosion and Sediment Control Plan; • a Surface Water Monitoring Program; • a Groundwater Monitoring Plan; and • a Surface and Ground Water Response Plan. 	September 2012
Surface and Groundwater Monitoring	<p>In response to iron exceedences Baal Bone will commence additional water monitoring at LDP1, at a weekly frequency for a period of 8 weeks to determine if any trends in iron levels are discernible with more frequent monitoring. If any trends are identified, Baal Bone will design and implement a response plan.</p> <p>In addition to a limited period of weekly sampling at LDP1, from January 2012 Baal Bone has instructed its water sampling company to carry out water sampling at LDP1 every month, regardless of whether the Overshot Dam is discharging.</p> <p>Baal Bone's Mining Operations Plan -Suspension of Mining Operations 2012 to 2015 (DRAFT) outlines the continuation of Baal Bone's environmental monitoring program during the MOP period. This includes the continuation of monitoring in groundwater piezometers in the area of LW 29 - 31 for at least a year during the care and maintenance phase.</p>	June 2012
Rehabilitation Management Plan (within Mining Operations Plan 2012 - 2015)	<p>The Mining Operations Plan - Baal Bone Suspension of Mining Operations 2012 to 2015 (DRAFT) will be amended to include the following, and subsequently resubmitted to NSW Department of Planning and Infrastructure and NSW Department of Trade and Investment, Regional Infrastructure and Service for approval:</p> <ul style="list-style-type: none"> • objectives contained within the Baal Bone Colliery Environmental Assessment- March 2010; • detail on weed management, including a timetable; • reference to the comprehensive Social Impact Assessment completed in 2008; and • inclusion of the Capertee Stringybark in the revegetation species list. <p>In accordance with the Mining Operations Plan - Suspension of Mining Operations 2012 to 2015 (DRAFT), Baal Bone will continue annual monitoring/walkover of rehabilitated areas by a suitably qualified ecologist/botanist.</p>	April 2012

Table 1: Baal Bone 2011 Independent Audit Action Plan - Summary

Item	Action Plan	Target Date of Completion
Biodiversity and Landscape Management Plan	<p>In correspondence from the Department of Planning (dated 03/02/12) approval has been granted for the revised Biodiversity and Landscape Management Plan.</p> <p>As part of the annual EMS Review Baal Bone will revise the BLMP and consideration will be given to the inclusion of include detail regarding:</p> <ul style="list-style-type: none"> • fauna and flora management; • threatened species or populations; • endangered ecological communities; • current and future impact monitoring; • timeframes and action plans; • review and implementation accountability; • the management of Ben Bullen Creek; and • reference to the comprehensive Ben Bullen Creek Management Plan to avoid replication. 	June 2012 (EMS Review)
Waste Management	Baal Bone will conduct a review of waste management procedures on-site, including procedures for updating the waste register to ensure compliance with section 4.1 of the Waste Management Plan.	June 2012 (EMS Review)
Pipeline Management	<p>Baal Bone has formalised the procedure for the inspection of pipelines in sensitive areas, by including pipeline inspection as a distinct item on Maintenance Work Orders. Work Order checklist sheets are automatically generated at defined intervals, and are the specific responsibility of an allocated competent employee.</p> <p>As part of the annual EMS review Baal Bone will revise and update XCN SD ANN 0040 Pipeline Management to reflect the new procedures and controls.</p>	March 2012 June 2012 (EMS Review)

Table 1: Baal Bone 2011 Independent Audit Action Plan - Summary

Item	Action Plan	Target Date of Completion
Review and update of EMS	<p>As part of the annual review of Baal Bone's EMS - strategies, plans and programs will be updated with the relevant recommendations arising from the 2011 independent audit. This includes:</p> <ul style="list-style-type: none"> • update, where necessary, XCN generic documentation to be site-specific for Baal Bone; • develop and maintain a legislative compliance register; • conduct a review of EMS records management to improve the efficiency and accessibility of compliance records; • review and update the reporting schedule to ensure that all relevant submissions and monitoring requirements under statutory approvals are identified and met; • update relevant procedures, forms and records used in response to non-compliance; and • appoint a suitably qualified person to be responsible for managing the requirements of the EMS. <p>As a result of changes to the NSW Protection of the Environment Operations (POEO) Act, all relevant management plans were updated with new reporting requirements. This occurred as a separate action, prior to the annual EMS review.</p>	June 2012
Environmental Management Reporting	<p>Henceforth Baal Bone will ensure that quarterly environmental performance reviews are completed and posted online. A retrospective report, for the Q4 2011 reporting period, will also be produced and published online to ensure that reporting requirements contained within the AQMP are met for time following the approval of the AQMP. Quarterly reviews will include air quality monitoring results.</p> <p>Consideration will also be given to the inclusion of noise, water, flora and fauna monitoring results in the quarterly environmental performance reviews.</p> <p>The 2011 Annual Environmental Management Report (due for submission to the NSW Department of Planning and Infrastructure by the 31st March 2012) will include a summary of rehabilitation inspections undertaken during 2011.</p>	May 2012
Access to Information	<p>Baal Bone will conduct a review of access to information procedures for publishing documents on the external website to ensure that requirements under Condition 9 of Schedule 5 are met.</p>	April 2012