

# Hunter Quarries - Karuah Quarry

## Independent Environmental Audit - Response to Audit Recommendations

Approval ID	Requirement	Evidence collected	Independent Audit Findings/Recommendations	Compliance Status	Hunter Quarries Commitment	Timing / Effective By
<b>Blast Hours</b>	6. Blasting at the site may only take place: a) between 9am and 3pm Monday to Friday inclusive; b) once per week; and c) at such other times as may be approved by the DEC.	AEMRs; EMP (2014); Biannual Noise Monitoring Reports (2014- to current)	As reported in the 2018 AEMR, a blasting event occurred on 8 October 2018 at 3:05pm. As outlined in this condition, blasting is to occur between 9am and 3pm (Monday to Friday) inclusive. No evidence was provided during the audit to suggest that approval had been received by EPA or DPE to allow blasting to be undertaken outside of standard hours. Based on the above Hunter Quarries are deemed non-compliant with this condition.  It is reported in AEMRs that two blasting events occurred on the same day, up to 10 minutes apart on: - 30/1/2018. - 3/2/2017 - 8/4/2016 - 8/7/2016 - 14/11/2014 and - 1/12/2014 subcondition b) of this condition outlines blasting events may only take once per week. Hunter Quarries should seek advice from DPIE as to whether these events are considered to be the same blasting 'event' due to the small amount of time between blasts.	<b>Non-Compliant</b>	HQ agrees with EMMs recommendation for this non-compliance. HQ will consult with the DPIE to determine what constitutes a blast event and then review the Blast Management Plan and make any necessary updates.	29 May 2020
<b>Air Quality Impact Assessment Criteria</b>	13. The Applicant shall ensure that the dust emissions generated by the development do not cause additional exceedances of the ambient air quality impact assessment criteria listed in Tables 6, 7, and 8 at any residence on, or on more than 25 percent of, any privately owned land. Pollutant Averaging period Criterion Total suspended particulate (TSP) matter Annual 90 µg/m3 Particulate matter < 10 µm (PM10) Annual 30 µg/m3	AEMRs; and EMP (2014)	The last audit (MCW 2014) outlines a letter from DECC dated 17 July 2008 describing that the Department no longer requires Heggies (the company monitoring at the time) to undertake regular PM10 monitoring. Therefore, the requirement for ongoing monitoring using the High Volume Air Sampler (HVAS) did not appear to be required. This condition requires the monitoring of PM10 and TSP in order to show compliance. It is recommended that Hunter Quarries enter formal discussions regarding the requirement for PM10 / TSP monitoring with DPIE following this audit, and following agreement with DPIE, amend the EMP to include HVAS, PM10 and TSP monitoring for Karuah and report data in future AEMRs, in accordance with development consent.	<b>Non-Compliant</b>	HQ undertakes regular TSP and PM10 monitoring for Karuah East Quarry operation using HVAS located at the closest resident to operation. In line with EMMS recommendation, HQ will update the EMP to include reporting of TSP and PM10 monitoring in future environmental monitoring reports.	30 June 2020



<b>Air Quality Impact Assessment Criteria</b>	Pollutant Averaging Period Criterion Particulate matter < 10 µm (PM10) 24 hour 50 µg/m3	AEMRs; and EMP (2014)	<p>The last audit (MCW 2014) outlines a letter from DECC dated 17 July 2008 describing that the Department no longer requires Heggies (the company monitoring at the time) to undertake regular PM10 monitoring. Therefore, the requirement for ongoing monitoring using the High Volume Air Sampler (HVAS) did not appear to be required.</p> <p>This condition requires the monitoring of PM10 and TSP in order to show compliance.</p> <p>It is recommended that Hunter Quarries enter formal discussions regarding the requirement for PM10 / TSP monitoring with DPIE following this audit, and following agreement with DPIE, amend the EMP to include HVAS, PM10 and TSP monitoring for Karuah and report data in future AEMRs, in accordance with development consent.</p>	<b>Non-Compliant</b>	HQ undertakes regular TSP and PM10 monitoring for Karuah East Quarry operation using HVAS located at the closest resident to operation. In line with EMMS recommendation, HQ will update the EMP to include reporting of TSP and PM10 monitoring in future environmental monitoring reports.	30 June 2020
<b>Conservation Offset Area</b>	<p>18. Within 3 years of this consent, the Applicant shall implement suitable arrangements to provide long term security for the conservation offset area, to the satisfaction of the Director-General.</p> <p>Note: The long term security of the offset can be achieved through a combination of the following: Deed of Agreement with the Minister, rezoning the land under the Great Lakes Local Environment Plan 1996, caveats on the title under the Conveyancing Act 191, etc....</p>	No conservation deed supplied	<p>The last audit (MCW 2014) outlined that the Lot 12 (offset area) is not currently secured in 'perpetuity' at the time and classed the condition as 'non-compliant'. During the previous audit, Hunter Quarries were reported as stating that 'they were hoping to put a restriction (caveat) on the title, which would be registered with land titles office'. This would mean the area would only be used for conservation.</p> <p>MCW 2014 recommended that Hunter Quarries seek Lot 12 security in perpetuity through a formal land title change through NSW Land and Property in consultation with the DPIE. As outlined in the 2016 AEMR, on the 23 June 2016, Hunter Quarries provided a submission seeking long term security for the conservation area through the implementation of a caveat on the title of Lot 12. It is stated in AEMR 2018 and AEMR 2017 that the caveat would be progressed further with the DPIE during 2019.</p> <p>No formalised evidence or correspondence was observed during the audit period (e.g. no deed or conservation bond for offset security). It is recommended Hunter Quarries follow up with DPIE and OEH in regards to arrangement (e.g. deed or agreement) which details long term security for the conservation offset area.</p>	<b>Non-Compliant</b>	HQ will consult with the DPIE and OEH in regards to the conservation offset area. HQ will be guided by DPIE and/or OEH in meeting compliance with this condition.	30 October 2020



<b>Conservation Offset Area</b>	<p>19. Before carrying out any clearing associated with Stage 2 of the development, the Applicant shall prepare, and subsequently implement, a Flora and Fauna Management Plan for the development to the satisfaction of the Director-General. This plan must include:</p> <p>a) a Vegetation Clearing Protocol;  b) a Remnant Vegetation Conservation Plan; and  c) a Conservation Offset Management Plan.</p>	<p>AEMRs;  EMP (2014);  EMS (2016); and  Flora and Fauna Management Plan (2014)</p>	<p>The Flora and Fauna Management Plan (2014) was sighted as part of the audit. No evidence of correspondence with DPIE for the approval of the 2014 version of the management plan was able to be provided. It is recommended that Hunter Quarries reviews and updates Flora and Fauna Management Plan (including sub-plans).</p>	<b>Non-Compliant</b>	<p>HQ agrees with EMMs recommendation for this non-compliance. HQ will revise the Flora and Fauna Management Plan and seek approval from DPIE.</p>	30 June 2020
<b>Conservation Offset Area</b>	<p>21. The Remnant Vegetation Conservation Plan shall:</p> <p>a) describe what measures would be implemented to conserve, maintain and enhance the vegetation on the site which will not be cleared as part of the development (in particular sub-populations of <i>Tetratheca juncea</i> (Black-eyed Susan)); and  b) describe how the performance of these measures would be monitored over time.</p>	<p>AEMRs;  EMP (2014);  EMS (2016);  and  Flora and Fauna Management Plan (2014)</p>	<p>Hunter Quarries has prepared and implemented a Remnant Vegetation Conservation Plan which adequately addressed measures for conservation, maintenance and enhancement of the vegetation on site and includes performance measures over time.</p> <p>It is noted that monitoring efforts for remnant vegetation areas ceased in 2011. The last audit (MCW 2014) recommended that Environmental Monitoring be conducted biannually to ensure all ecological values are monitored to determine any changes within communities.</p>	<b>Non-Compliant</b>	<p>HQ will review the EMP and in consultation with DPIE, look to address this non-compliance.</p>	30 June 2020
<b>Site Water Management Plan</b>	<p>26. Within 12 months of the date of this consent, the Applicant shall prepare, and subsequently implement, a Site Water Management Plan for the development, in consultation with the DEC, and to the satisfaction of the Director-General. The plan shall detail how site water management on site will be integrated with existing surface water management and erosion and sediment control systems and address surface water management and erosion and sediment control at both the construction and operation phases of the development. This plan must include:</p> <p>a) an Erosion and Sediment Control Plan;  b) a Surface Water Monitoring Program; and  c) a site water balance.</p>	<p>AEMRs;  Site Water Management Plans (2014, 2015, 2016);  and  EPL 11569</p>	<p>Site Water Management Plan 2016 approved by DPIE in letter dated 1 April 2016, sighted and meets conditions of consent.</p> <p>Audit actions from the previous audit, while addressed in Table 1 of the current Site Water Management Plan (2016), do not appear to be fully implemented at the site, as evidenced by the discharge scenario identified during the site inspection (refer to Condition 24 above). It was unclear during the site inspection if a water level sensor was installed on Dam 2 or if an alarm was set for high water levels in the dam. The WMP states that these items have been installed and implemented.</p> <p>EMM recommends that Hunter Quarries update the Site Water Management Plan to formalise adequate management procedures of discharge point.</p>	<b>Non-Compliant</b>	<p>HQ will revise the Site Water Management Plan, including review of the discharge procedure, and seek approval from the DPIE.</p> <p>NOTE: LDP001 is fitted with a metered discharge valve and capacity indicator. HQ would not look to install a lock on the valve lever as this could result in future issues with the leave and whole valve.</p>	30 June 2020



<b>Surface Water Monitoring</b>	<p>28. The Applicant shall:</p> <p>a) measure:</p> <ul style="list-style-type: none"> <li>• the volume of water discharged from the site via licensed discharge points;</li> <li>• water use on the site;</li> <li>• water transfers across the site; and</li> <li>• dam and water structure storage levels.</li> </ul> <p>b) regularly monitor the quality of the surface water discharged from the licensed discharge points on the site;</p> <p>to the satisfaction of the DEC and the Director-General.</p>	<p>Site Water Management Plans (2014 and 2015) (Erosion and Sediment Control Plan, Surface Water Monitoring Program and site water balance) Water Usage Information</p>	<p>The last audit (MCW 2014) considered part a) of this condition 'non-compliant' and part b) 'compliant'. The following recommendations were made in light of this, including:</p> <ul style="list-style-type: none"> <li>- Revise and update SWMP to formalise adequate management procedures for discharge point, including the review of the monitoring and notification of high-water levels at Sediment dam 2; and</li> <li>- Formalise roles and responsibilities in relation to water discharge events.</li> </ul> <p>The WMP (2016) states that the water level in Sediment Dam 2 is monitored via an electronic height sensor, however the sensor did not appear to be operating during the site inspection. The SWMP describes that the flow of water can be estimated based on the flow through the discharge pipeline. The 2018 AEMR outlines that the site has the ability to pump water back up into the pit area (unused section) to increase capacity.</p> <p>Based on the site inspection it is not evident that any of the audit actions from the previous audit had been addressed, as discharge was occurring during the inspection after a 10 mm rainfall event, when no discharges had previously occurred at the site according to documentation reviewed for the audit.</p> <p>Recommendations as per response to Condition 26</p>	<b>Non-Compliant</b>	<p>HQ will revise the Site Water Management Plan, including review of the discharge procedure, and seek approval from the DPIE.</p> <p>NOTE: LDP001 is fitted with a metered discharge valve and capacity indicator. HQ would not look to install a lock on the valve lever as this could result in future issues with the leave and whole valve.</p>	30 June 2020
<b>Bushfire Management</b>	<p>36. The Applicant shall:</p> <p>a) ensure that the development is suitably equipped to respond to any fires on-site; and</p> <p>b) assist the Rural Fire Service and Emergency Services as much as possible if there is a fire on-site.;</p> <p>and within 6 months of the date of this consent, the Applicant shall prepare a conservation sensitive Bushfire Management Plan for the development, to the satisfaction of Council and the Rural Fire Service.</p>	<p>Bushfire Management Plan 2014; AEMRs;</p>	<p>The Bushfire Management Plan (BMP-GSSE dated August 2006) was updated and finalised in December 2014. No evidence of approval of the plan from council or RFS was available for observation. A copy of the plan was sighted during the audit.</p> <p>Plant and equipment available onsite for firefighting purposes includes:</p> <ul style="list-style-type: none"> <li>- water storage dam (Sediment Dam 2) with a permanent fill point for tankers, and a 50,000 L clean water tank;</li> <li>- water tanker and earth tanking equipment; fire extinguishers; warning alarm siren; and</li> <li>- portable radios.</li> </ul> <p>Hunter Quarries also employee site induction training specific to emergency response. Site Induction Training was observed and noted.</p> <p>It is recommended that Hunter Quarries follow-up with Council and RFS regarding the approval of this plan so that it is approved in accordance with the condition requirement.</p>	<b>Non-Compliant</b>	<p>HQ agrees with EMMs recommendation for this non-compliance. HQ will revise the Bushfire Management Plan with consultation from MidCoast Council and the RFS, and then seek approval from the DPIE.</p>	30 June 2020



<b>Environmental Monitoring Program</b>	4. Within 3 months of the completion of the Independent Environmental Audit (see condition 6 below), the Applicant shall review, and if necessary revise, the Environmental Monitoring Program to the satisfaction of the Director-General.	EMP (2014)	The EMP does not appear to have been updated following the previous IEA. No formalised correspondence from DPIE regarding Environmental Monitoring Plan (2014) was sighted. Hunter Quarries is to review and update EMP within specified timeframe of the completion of the IEA (2019).	<b>Non-Compliant</b>	HQ agrees with EMMs recommendation for this non-compliance. HQ will revise the EMP and seek approval from DPIE.	31 January 2020
<b>Community Consultative Committee</b>	10. If the Applicant does not receive at least two expressions of interest to serve on the CCC the Applicant shall instead develop a communications strategy for consulting with Council and residents within 2 km of the development, to the satisfaction of the Director-General. This strategy should outline how the Applicant will advise Council and nearby residents on its environmental management plans, monitoring results, audit reports or complaints. This communication should occur twice a year. Notes: If during the course of the development, a Community Consultative Committee that has been established is found to be no longer effective, the Director-General may agree to its disbandment.	EMS 2016	No evidence supplied of submission of reports in accordance with the communications strategy detailed in the EMS. EMM recommend that these reports are prepared as discussed in the EMS and as required by this condition of consent. Alternatively, a CCC for Karuah Quarry should be implemented .	<b>Non-Compliant</b>	HQ agrees with EMMs recommendation for this non-compliance. HQ will review the Community Communication Strategy and revise accordingly with consultation from the DPIE.	30 April 2020