



Ms Georgia Dragicevic
 Acting Team leader Compliance
 Department of Planning and Environment
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8th March 2019

Dear Ms Dragicevic

**Boral Peppertree Quarry (MP 06_0074)
 Independent Audit
 Response to recommendations**

We refer to Peppertree Quarry (MP 06_0074) Condition 5, Schedule 5 requiring an Independent Audit to be conducted on the operations' compliance with the Condition of Consent. This Condition requires that the Independent Audit report be issued to the Department accompanied with a response to the recommendations contained in the Audit report.

Attached is the Independent Audit Report on Peppertree Quarry issued to Boral on the 7th March 2019.

The Independent Audit has provided valued feedback to the Peppertree operations. Our response to the recommendations are listed below in line with the Reports Table 5-8 "Summary of Opportunities for Improvement".

No.	Condition / recommendation # Issue / observation	Recommendation	Response	Due Date
PQ 1/18	COA, Schedule 3, Condition 9 The NBMP generally meets the criteria as outlined in this condition. However, the plan does not include a section on best practice (as referenced in the condition).	The NBMP should be updated to include a section on best practice and how activities are reviewed to ensure they align with current best practice.	The NBMP will be reviewed by the end of April 2019 in response to the Independent Audit. This will include a section on Best practice and how activities are reviewed to ensure they align with current best practice.	30 th May 2019
PQ 2/18	COA, Schedule 3, Condition 10 The NBMP has been	The plan should be updated to reflect the recent changes to noise mitigation brought about	The NBMP will be reviewed by the end of April 2019 in response to the	30 th May 2019



No.	Condition / recommendation # Issue / observation	Recommendation	Response	Due Date
	<p>developed in compliance with the condition and adequately addresses all assessment criteria.</p> <p>However, the following observations have been made:</p> <ul style="list-style-type: none"> • The plan does not reflect the recent changes to noise mitigation brought about from the Voluntary Undertaking. • A number of references are still made to activities that are to be completed in 2017. • Table 2 in the plan references the incorrect condition. 	<p>from the Voluntary Undertaking.</p> <p>It is recommended that when the Noise Management Plan is next updated, all dated references are checked and updated / removed where relevant.</p> <p>Table 2 in the plan should be updated to reference the correct condition.</p>	<p>Independent Audit. It will be reviewed in line with the recommendations.</p>	
<p>PQ 3/18</p>	<p>COA, Schedule 3, Condition 17</p> <p>Boral undertook a review of dust deposition gauges for the last three years to identify the root cause of non-compliances (through Todoroski Air Sciences). They found that higher than usual levels have occurred during the Spring and Summer months for EPL monitoring location D1. In most cases, these are also associated with low levels of ash and therefore high levels of organics. The organic matter is primarily bird related.</p> <p>Air quality monitors are located within Boral's property boundary. When exceedances are modelled to receiver locations as specified in this condition i.e. 'at any residence on privately owned land, or on more than 25 percent of any privately-owned land' the dust deposition levels are found to be below criteria.</p>	<p>It is recommended that discussion with EPA and DP&E are continued regarding the relocation of these monitoring points to as more representative area that aligns with the requirements of the MCoA. Alternatively, this condition of consent may require modification to align with the current arrangement and ensure that it can be implemented effectively.</p>	<p>Discussions will be progressed with the DPE and EPA and the outcomes in regards to the Air quality gauges captured in the revision of the Air Quality Management Plan.</p>	<p>30th May 2019</p>
<p>PQ 4/18</p>	<p>COA, Schedule 3, Condition 19</p> <p>The AQMP generally meets the criteria as</p>	<p>The AQMP should be updated to include a section on best practice and how activities are</p>	<p>The AQMP will be reviewed by the end of April 2019 in response to the Independent</p>	<p>30th May 2019</p>



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	<p>outlined in this condition. Some best management practice measures that have been implemented including the use of weather zone forecasting system for wind to identify high risk days and the application of citrus based dust suppression polymers to exposed areas.</p> <p>However, the plan has not been kept up to date with current best practice in relation to air quality monitoring.</p>	<p>reviewed to ensure they align with best practice.</p> <p>An investigation of best practice relating to air quality at similar facilities should be undertaken to understand the feasibility and value of implementing best practice systems (eg continuous air quality monitoring)</p>	<p>Audit. This will include a section on Best practice and how activities are reviewed to ensure they align with current best practice.</p>	
<p>PQ 5/18</p>	<p>COA, Schedule 3, Condition 29</p> <p>Water <i>quality</i> monitoring occurs within Tangarang Creek and Barbers Creek. Water <i>flow</i> monitoring occurs within Tangarang Creek. However, water <i>flow</i> monitoring does not occur within Barbers Creek in accordance with the condition. This is a result of Barbers Creek being inaccessible and unsuitable for installation of flow monitoring equipment.</p>	<p>It is recommended that discussions are held with DP&E regarding modification of this condition to facilitate practical implementation</p>	<p>A review of the water monitoring requirements will be undertaken as part of the revision of the WMP and including ongoing water <i>flow</i> data collection in Barbers Creek.</p>	<p>30th May 2019</p>
<p>PQ 6/18</p>	<p>COA, Schedule 3, Condition 41</p> <p>As flagged within the 2015 Audit and the DP&E 2016 audit. Since these audits the waste management provider has been changed. Veolia is now the primary provider, Fast Skips – steel and Endeavour Industries collects office waste. However, no evidence was sighted that recommendations from the previous audit have been implemented. No formal waste management plan or document is in place to support the implementation of reasonable and feasible measures to minimise waste generated by the project. Arcadis understand that a plan is being developed by Boral.</p>	<p>Boral should establish a clear procedure around monitoring and recording waste generation. It is recommended that the waste contractors are engaged to assist with this process.</p>	<p>A waste management procedure will be developed to outline the current management of waste on the site and the programs in place for minimisation and recycling as well as tracking</p>	<p>30th June 2019</p>



No.	Condition / recommendation # Issue / observation	Recommendation	Response	Due Date
PQ 7/18	COA, Schedule 3, Condition 42 During the site visit it was observed that Veolia bins on site were not being utilised for the marked waste types. I.e. bins marked for recycling not receiving recyclable materials	As above	On completion of a new stores area, a number of recycling bays will be established with the areas clearly identified for recycled materials.	30 th September 2019
PQ 8/18	COA, Schedule 3, Condition 46 Production data is provided within the AEMR. However, no evidence has been sighted of this data being provided to DRE.	Production data should be provided to DRE using the standard form for that purpose in accordance with the requirements of the condition.	Noted. A copy of the production data will be issued to the Department of Planning and Environment outside of the annual AEMR.	Annually by October
PQ 10/18	COA, Schedule 5, Condition 9 Environmental performance data is not located on Boral Peppertree's specific web page but on the Boral website and the website is difficult to navigate to find the relevant information.	The web page should be redesigned to be easier to navigate. Information on the page could benefit from being aligned to this condition of approval (at a high level) so information is easier to find.	The Peppertree Quarry website has been developed to align with all other Boral quarry website information. Feedback will be provided to Boral Corporate as to the Audit findings and whether changes to the website design and navigation can be undertaken.	30 th May 2019
PQ 12/18	EPL,M5.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint. Contact line is available, but it is not clear on the website that this line that can be used for complaints. However, it is noted that the complaints hotline is included in the local newsletter.	The website should be updated to clearly identify the telephone number through which complaints can be made.	The Peppertree Quarry website has been developed to align with all other Boral quarry website information. Feedback will be provided to Boral Corporate as to the Audit findings and whether changes to the website design and navigation can be undertaken.	30 th May 2019
Outstanding recommendations from 2016 DP&E Audit				
PQ 13/18	COA, Schedule 3, condition 41 (a) Waste management review	Boral should establish a clear procedure around monitoring and recording waste generation. It is	A waste management procedure will be developed to outline the current	30 th June 2019



No.	Condition / recommendation # Issue / observation	Recommendation	Response	Due Date
	to be undertaken and procedures to be put in place for management, including data collection and analysis. Procedures to be in place by July 2017	recommended that the waste contractors are engaged to assist with this process. Arcadis understand that a waste management plan is being developed by Boral.	management of waste on the site and the programs in place for minimisation and recycling as well as tracking	

Outstanding recommendations from 2015 IEA

PQ 14/18	PQ 6/15 Peppertree Quarry website is difficult to navigate, and it is unclear if the data on the website meets all requirements under the conditions of consent.	It is recommended that the website be redesigned to present the required data more clearly. Peppertree Quarry could be separated from the Marulan South Limestone Mine page to avoid confusion. It is recommended that headings are aligned to those in the McoA to make navigating the site easier.	The Peppertree Quarry website has been developed to align with all other Boral quarry website information. Feedback will be provided to Boral Corporate as to the Audit findings and whether changes to the website design and navigation can be undertaken.	30 th May 2019
PQ 15/18	PQ 9/15 Boral does not appear to be tracking waste or identifying areas of further improvement. Boral identified that the primary waste contractor has recently changed and this data is now being collected.	It is recommended that Boral engage with waste contractors to track waste with the aim of implementing and monitoring waste minimisation strategies.	A waste management procedure will be developed to outline the current management of waste on the site and the programs in place for minimisation and recycling as well as tracking	30 th June 2019

If you require any further information regarding the above, please contact Angus Shedden, Manager Peppertree Quarry, on 0401 894 513.

Yours sincerely

Angus Shedden
Manager Peppertree Quarry

