



Boral Construction Materials Ltd

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Ms Georgia Dragicevic
Senior Compliance Officer
Resource Assessments and Compliance
NSW Department of Planning and Environment
PO Box 5475 Wollongong NSW 2520

Re: Dunmore Quarry Independent Environmental Audit Response to Recommendations

Dear Ms Dragicevic,

The independent environmental audit report issued to Boral in June 2015 provided valuable feedback to the Boral Dunmore Quarry operations. The Quarry's responses, in line with the Report's Table 8 "Summary of opportunities for improvement", are attached for the Department of Planning and Environment records.

Kind Regards,

A handwritten signature in blue ink that reads "Glenn Troy".

Glenn Troy

Dunmore Quarry Manager

Boral Dunmore Quarry – Independent Environmental Audit Response to Recommendations

No.	Consent condition/issue	Recommendation	Response
DQ1/14	Sched 4, C 19 Public notice of blasting	Ensure that information regarding the blast hotline is advertised in a local newspaper annually. Alternately, blast information should be provided on the Dunmore Quarry website (discussions with Kate Jackson identified that the website is still being populated and would be functional by early October 2014). Notification that the site was functional was received on the 03/11/2014, however a section on blast information could not be identified at http://www.boral.com.au/Article/dunmore_quarry_mainpage.asp	Through Modification 8 of the Development consent, in condition 19 of Schedule 4, all words after “the Applicant” were deleted and replaced with “must operate a blasting hotline, or alternative system agreed to by the Secretary, to enable the public to get up-to-date information on blasting operations at the development”. Dunmore Quarry operates a 'hotline' for neighbours who wish to be notified ahead of blasting events. Information on how to register for notification is available on the Dunmore Quarry Website.
DQ2/14	Sched 4, C 24 Fines Management Plan	It is suggested that Boral enter into discussions with DPE regarding revising the details of this condition. It may be more appropriate that implementation of the Fines management Plan is triggered once stockpiles of fines reach a certain value.	Through Modification 8 of the Development consent, condition 24 of Schedule 4 was deleted (excluding the Note) and replaced with “The Applicant must implement all reasonable and feasible measures to stabilise the surface of stockpiles of crusher fines to minimise wind-blown dust emissions, erosion and sedimentation.
DQ3/14	Sched 4, C 30 Site Water Balance	It is suggested that Boral enter into discussions with DPE regarding revising the details of this condition. The water balance was revised as part of the amended Water Management Plan (Evans and Peck, April 2008) in light of the new dam configuration and water transfer systems onsite. Therefore, the water balance presented in the EIS is no longer valid. It would be more appropriate to provide information regarding: <ul style="list-style-type: none"> • Water demand for the previous year • Rainfall and inflows for the previous year, as compared to the average presented in the water balance • Dam storage levels and the possible implications on sourcing required demand from onsite dams and/or mains. 	Through Modification 8 of the Development consent, condition 30 of Schedule 4 was deleted and replaced with: In each Annual Review, the Applicant must: (a) recalculate the site water balance for the development; (b) provide information on evaporative losses, dust suppression, dam storage levels and implications of obtaining any water supplies from off-site; and (c) evaluate water take against licensing requirements
DQ4/14	Sched 4, C 37 Flocculant Management Plan	It is suggested that Boral enter into discussions with DPE regarding deleting this condition.	This condition was deleted through Modification 8 of the Development consent.
DQ5/14	Sched 4, C 38	It is suggested that Boral enter into discussions with DPE regarding	Through the Environmental Assessment related to Modification 8 it

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DQ6/14	Other Water Management Works Sched 4, C 40 Monitoring (groundwater)	deleting this condition if the above actions are to the satisfaction of the Director-General. It is suggested that Boral initiate discussions with DPE regarding the purpose of regional groundwater monitoring. If this information is not being used for decision-making, then the cost associated with monitoring may not be justified.	was proposed to it was proposed to delete this condition as actions have been completed and were reported back to the EPA and the Secretary through the quarry's Annual Review. Through Modification 8 of the Development consent, the following note was inserted at the end of condition 30 of Schedule 4: <i>"On the provision of two years of monitoring data that shows negligible impact on the regional groundwater network, the Secretary may agree to suspend monitoring of regional groundwater levels and/or quality."</i>
DQ7/14	Sched 4, C 41 Site Water Management Plan	It is recommended that all water management plans and strategies be reviewed, updated (based on the relevant guidelines) and integrated into a single operational document.	The water management plan and associated sub-plans and strategy have been updated into a single operational document. The updated water management plan was approved by the Secretary on the 06/12/2016.
DQ8/14	Sched 4, C 42 Erosion & Sediment Control Plan	The ESCP should be prepared as a separate plan (within the WMP) that address the requirements of the Blue Book and this condition.	The ESCP has been prepared and included in the water management plan. The updated Water Management Plan was approved by the Secretary on the 06/12/2016.
DQ9/14	Sched 4, C 43 Surface Water Monitoring Program	The detail provided for all environmental monitoring is limited, and in some instances does not fully cover the requirements of the Development Consent. It is suggested that Environmental Monitoring Program be reviewed to ensure the necessary detail is included.	The surface water monitoring program has been updated and included in the water management plan. The updated Water Management Plan was approved by the Secretary on the 06/12/2016.
DQ10/14	Sched 4, C44 Ground Water Monitoring Program	A groundwater monitoring program should be established to meet elements (a) and (b) of this condition, and as detailed in the EMP. The rationale for including regional groundwater monitoring in this condition, and how the subsequent information will be used, is not clear. It is suggested that Boral initiate discussions with DPE to clarify this condition, and delete if appropriate.	The groundwater monitoring program has been updated and included in the water management plan. The updated Water Management Plan was approved by the Secretary on the 06/12/16.
DQ11/14	Sched 4, 47 Flora and Fauna	It is recommended that all flora and fauna management plans and strategies be reviewed, updated (based on the relevant guidelines and	The flora and fauna management plan and associated sub plans and protocol have been updated. The updated flora and fauna

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	Management Plan	best practice) and integrated into a single operational document.	management plan was approved by the Secretary on the 18/01/17.
DQ12/14	Sched 4, C 52 Independent Audit of the Flora & Fauna Management Plan	It is recommended that Boral initiates an independent audit of the Flora and Fauna Management Plan as soon as possible. A request to prepare a proposal for the audit was sighted on the 04/11/2014.	Boral Dunmore Quarry received approval on a suitably qualified, experienced and independent auditor 28/09/16. Boral Dunmore Quarry will conduct the independent audit by April 2017.
DQ13/14	Sched 4, C 54 Rehabilitation Management Plan	Undertake a complete review of the RMP to ensure it meets the requirements of this condition, represents BMP and integrates effectively with other elements of the FFMP.	The rehabilitation management plan has been reviewed and updated. The updated rehabilitation management plan was approved by the Secretary on the 18/11/2016.
DQ14/14	Sched 4, C 57 Rehabilitation and Conservation Bond	Ensure that the Rehabilitation and Conservation Bond is lodged as soon as possible. This requirement should be included on a regulatory compliance schedule and responsibility allocated.	The rehabilitation and conservation bond will be lodged with the Secretary as soon as possible. This requirement will be included in the Boral electronic tracking system to trigger alerts when the review is due.
DQ15/14	Sched 4, C 58 Reporting – Rehabilitation Management Plan	The actions reported in the AEMR should be linked to the actions identified in the RMP. As identified above, undertake a complete review of the RMP to ensure it meets the requirements of S4, C 54, represents BMP and integrates effectively with other elements of the FFMP.	The rehabilitation management plan has been reviewed and updated. The updated rehabilitation management plan was approved by the Secretary on the 18/11/2016.
DQ16/14	Sched 4, C 60 Transport Management Plan	Prepare the TMP as soon as possible, and integrate the components already developed to date.	The transport management plan has been prepared and was approved by the Secretary on 18/11/16.
DQ17/14	Sched 4, C 70 Waste Minimisation	Seek appropriate approval for tyre reuse on the site as soon as possible.	Tyre register has been developed outlining re-use purposes and emergency spares. Discussions with the Environmental Protection Authority will begin in as soon as possible and if required appropriate approval sought.
DQ18/14	Sched 4, C 72 Waste reporting	Waste reporting could include types and weights/ volumes of waste generated and recycled. This would allow for comparisons between years	Waste tracking system to be updated and comparisons completed for future AEMR's.

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DQ19/14	Sched 5, C 2	<p>and to identify the effectiveness of waste reduction measures/ initiatives.</p> <p>Provide a copy of the Environmental Management Strategy to Council and maintain records of communication. Upload a copy of the strategy to the Boral Dunmore Quarry website.</p>	<p>A copy of the existing Environmental Management Strategy (EMS) is available on the Boral Dunmore Quarry website. The EMS will be reviewed and updated as soon as possible to reflect the recently approved management plans. The updated EMS will be uploaded to the Dunmore Quarry website and provided to Council, with correspondence recorded.</p>
DQ20/14	Sched 5, C 5	<p>Review the format and content of the AEMR and ensure that current and accurate information is provided.</p>	<p>The AEMR/Annual Review format was reviewed during the 2015/2016 Annual Review process.</p>
DQ21/14	Sched 5, C 11	<p>Ensure the website is populated with the required information by the end of November 2014.</p>	<p>The Boral Dunmore Quarry website is continually undergoing improvements with the upload of required information as they become available. A reminder system will be established to ensure the website is reviewed and kept up to date.</p>
DQ22/14	Sched 5 C 13 Revision of Strategies, Plans and Programs	<p>As identified previously, there have been a number of non-compliances regarding the meeting the timeframes for the preparation strategies, plans, and programs and document reviews have been sporadic. As such a review schedule should be established and maintained to ensure future compliance with this requirement.</p>	<p>All review requirements will be included in the Boral electronic tracking system (EAM) to trigger alerts when the review is due, additionally an onsite wall planner/calendar will be prepared to meet these requirements.</p>