



Ms Katrina O'Reilly
Team Leader Compliance
Department of Planning & Environment
PO Box 5475
Wollongong NSW 2520

Email: Katrina.OReilly@planning.nsw.gov.au
CC: Georgia.Dragicevic@planning.nsw.gov

22 February 2018

Dear Ms O'Reilly,

Re: 2017 Independent Environmental Audit Report Submission

Holcim (Australia) Pty Ltd (Holcim) owns and operates Cooma Road Quarry, located approximately 6 kilometres south of Queanbeyan, NSW. Cooma Road Quarry has been operating since 1959 and is a significant supplier of granite and dacite hard rock aggregates in the region.

In September 2013, a new State Significant Development (SSD-5019) approval was granted to provide an additional 20 years of quarry life and an increased production limit from 1 million tonnes per annum (Mtpa) to 1.5 Mtpa.

As per Condition 10 of Schedule 5 of the Development Consent (SSD-5019), Holcim engaged Pitt&sherry to conduct an Independent Environmental Audit representing the first of three yearly audits required for the site. Pitt&sherry were endorsed by the Secretary of the Department of Planning & Environment as per letter dated 26 October 2017 (included in this submission letter as Attachment 1).

As per Condition 11 of Schedule 5 of the Development Consent (SSD-5019), please find enclosed the 2017 Independent Environmental Audit report for Cooma Road Quarry. Holcim has considered the recommendations from this report and developed a response (included in this submission letter as Attachment 2).

Please do not hesitate to contact me if you have any questions.

Yours sincerely,

A handwritten signature in cursive script that reads 'Amy Nelson'.

Amy Nelson
Planning & Environment Coordinator – NSW/ACT

Attachment 1:

Endorsement by the Department of Planning &
Environment



Contact: Georgia Dragicevic
Phone: 4224 9477
Fax: 4224 9470
Email: Georgia.Dragicevic@planning.nsw.gov.au

Ms Rachel Heath
Planning & Environment Manager
Holcim (Australia) Pty Ltd
PO Box 76
MARULAN NSW 2579

Dear Ms Heath

**Cooma Road Quarry (SSD 5109)
Independent Environmental Audit 2017**

I refer to your letter dated 10 October 2017 seeking approval of Ken Holmes of KMH Environmental as the lead auditor for the upcoming Cooma Road Quarry Independent Environmental Audit, in accordance with condition 10 of Schedule 5 of the State significant development consent SSD 5109 (the consent).

Having considered the qualifications and experience of Mr Holmes, the Secretary endorses the appointment of Mr Holmes to undertake the audit in accordance with condition 10 of Schedule 5 of the consent. This approval is conditional on Mr Holmes being independent of the development.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing and in accordance with the Independent Audit Guideline dated October 2015. A copy of this guideline can be located at <http://www.planning.nsw.gov.au/Policy-and-Legislation/Mining-and-Resources/Integrated-Mining-Policy>.

The audit report is to include the following:

- a compliance table indicating the compliance status of each condition of approval and any relevant EPL;
- not use the term "partial compliance";
- recommend actions in response to non-compliances;
- review the adequacy of plans and programs required under this consent; and
- identify opportunities for improved environmental management and performance.

Within 10 weeks of commissioning the audit, or as otherwise agreed by the Secretary, Holcim is to submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations. Prior to submitting the audit report to the Secretary, it is recommended that Holcim review the report to ensure it complies with the relevant consent condition.

Should you have any enquiries in relation to this matter, please contact Georgia Dragicevic, Senior Compliance Officer, on telephone number (02) 4224 9477 or by email to Georgia.Dragicevic@planning.nsw.gov.au

Yours sincerely

Katrina O'Reilly
Team Leader Compliance
as nominee of the Secretary

Attachment 2:

Holcim Response to 2017 Independent
Environmental Audit Recommendation

Table 1. Development Consent SSD_5109 - MOD 1

Schedule	Condition	Condition Description/Requirement	Compliance	Pittsherry Comments & Recommendations	Holcim Comments & Response to Recommendations
2	26	<p>The Applicant must pay Council road maintenance contributions of \$0.2911 per tonne for every tonne of quarry product or recycled concrete transported to and from the site in accordance with Council's Section 94 Contributions Plan – No 2 Extractive Industry. Each payment must be:</p> <p>(a) paid to Council at the end of each calendar year; and</p> <p>(b) based on weighbridge records of the quantity of quarry products and recycled concrete transported to and from the site.</p> <p>Note: If the parties are not able to agree on any aspect of the road upgrade and maintenance contributions, either party may refer the matter to the Secretary for resolution.</p>	Not Verified	Documentation confirming compliance with this Condition was not available for review.	Noted. Holcim will continue to pay Council road maintenance contributions in accordance with this Condition.
3	1	<p>The Applicant must keep accurate records of:</p> <p>(a) the amount of quarry products transported from the site (monthly and annually) and publish these records on its website on a quarterly basis; and</p> <p>(b) the quantity, destination and source of all laden truck movements to and from the site (hourly, daily, weekly, monthly and annually).</p>	Observation	<p>(a) Production data is commercially sensitive. Annual production data is provided in the Annual Review (see Schedule 2, Condition 17) to confirm that the quarry's production limits are not exceeded. The data is captured in weighbridge records and in Annual Review documents.</p> <p>(b) Weighbridge records record the quantity, destination of all laden truck movements to and from the site (hourly). This information can be used to determine daily, weekly, monthly and annually dispatches.</p> <p>Observation: AEMR 2016 for the calendar year is signed by NSW Planning and Environment Coordinator on 31 March 2016</p> <p>Recommendation: this typographical error should be corrected.</p>	Noted. Holcim will continue to provide annual production data in the Annual Review. Holcim will ensure future Annual Reviews are proof-read to avoid typographical errors.
3	6	<p>The Applicant must:</p> <p>(a) implement best management practice to minimise the construction, operational and traffic noise of the development;</p> <p>(b) minimise the noise impacts of the development during meteorological conditions when the noise limits in this consent do not apply;</p> <p>(c) maintain the effectiveness of any noise attenuation</p>	Not Compliant	(a) The Noise Management Plan (2014) describes best management practice to minimise the construction and operational traffic noise. Earth bunds have been constructed in accordance with the plan. Night/evening work are not undertaken. The 2014 and 2015 Annual Reports stated that no noise monitoring was	Noted. Holcim will continue to undertake attended noise monitoring on a quarterly basis. Holcim will also engage a suitably qualified person to conduct a sound power level testing program to review against sound power level (SWL) for equipment outlined in the Environmental Impact Statement (EIS). A comprehensive

		<p>on equipment to ensure consistency with the benchmark sound power levels presented in the EIS; and</p> <p>(d) regularly assess the results of noise monitoring to ensure compliance with the relevant conditions of this consent, to the satisfaction of the Secretary.</p>		<p>being undertaken and planned to commence quarterly noise monitoring in 2016.</p> <p>(b) As per (a).</p> <p>(c) The Noise Management Plan (2014) states that “the three-yearly sound power level testing program will commence with the first year of operations following Development Consent”. This has not occurred. Other than noting that there have been no noise-related complaints, it cannot be assessed whether this condition has been met.</p> <p>(d) Attended noise monitoring of operations are being undertaken (see Appendix 9, Condition 3). The AEMR 2016 includes detailed noise report.</p> <p>Conclusion: Noise monitoring data is not available for the entire audit period however it is to be included in the annual report as of 2016.</p>	<p>obligations register will assist with managing these commitments.</p> <p>Responsibility: Both the Planning & Environment team and Quarry Manager</p> <p>Date: Quarter 2, 2018</p>
3	7	<p>The Applicant must prepare and implement a Noise Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with Council and the EPA, and submitted to the Secretary for approval within 6 months of this consent;</p> <p>(b) describe the measures that would be implemented to comply with the:</p> <ul style="list-style-type: none"> • noise criteria in Table 1; • hours of operation in Table 2; and • operating conditions in Condition 7 above; <p>(c) include a monitoring program that:</p> <ul style="list-style-type: none"> • incorporates quarterly (or as otherwise agreed by the Secretary) attended noise monitoring to evaluate the performance of the development against the noise criteria in Table 1; • includes a protocol for determining exceedances of the noise criteria in Table 1; and • assesses the sound power levels of the equipment on site, compares it with the benchmark levels used in the EIS, and evaluates the effectiveness of any attenuation. <p>The Applicant must implement the approved management plan as approved from time to time by the Secretary.</p>	Not Compliant	<p>a) The Noise Management Plan has been prepared and submitted as required.</p> <p>b) and c): The plan includes details of how to address the relevant requirements including attended noise monitoring.</p> <p>Table 2.1 in the Noise Management Plan refers to section 2.1.3 of the plan on addressing condition 7 (a). there is no section 2.1.3 in the plan (2014).</p> <p>The AEMR contains the reports of quarterly noise monitoring in the appendix (December 2016 report by WSP/PB indicating the noise levels are likely to have been within Development Consent conditions).</p> <p>However, implementation of the plan is inadequate in terms of noise monitoring and reporting.</p> <p>Conclusion: Section 6.1 of the plan (2014) refers to quarterly attended noise monitoring however this was not implemented until June 2016. This is now being implemented.</p>	<p>Noted. Holcim will continue to undertake attended noise monitoring on a quarterly basis. Holcim will also engage a suitably qualified person to conduct a sound power level testing program to review against sound power level (SWL) for equipment outlined in the Environmental Impact Statement (EIS). A comprehensive obligations register will assist with managing these commitments.</p> <p>Responsibility: Both the Planning & Environment team and Quarry Manager</p> <p>Date: Quarter 2, 2018</p>

3	9	<p>The Applicant must ensure that the blasting on the site does not cause exceedances of the criteria in Table 3. Table 3: Blasting Criteria</p> <table border="1" data-bbox="369 536 1019 651"> <thead> <tr> <th>Location</th> <th>Airblast overpressure (dB(Lin Peak))</th> <th>Ground vibration (mm/s)</th> <th>Allowable exceedance</th> </tr> </thead> <tbody> <tr> <td></td> <td>120</td> <td>10</td> <td>0%</td> </tr> <tr> <td>Any residence on privately-owned land</td> <td>115</td> <td>5</td> <td>5% of the total number of blasts over a period of 12 months</td> </tr> </tbody> </table> <p>However, these criteria do not apply if the Applicant has a written agreement with the relevant owner or infrastructure provider/owner, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance		120	10	0%	Any residence on privately-owned land	115	5	5% of the total number of blasts over a period of 12 months	Not Compliant	<p>One blast event logged in INX breach of blasting limit on 14/12/16. The Auditor understands that this exceedance is an isolated event.</p> <p>Recommendation: Continue to monitor blasts. If exceedances occur in the future, undertake a review of blasting procedures.</p>	<p>The EPA & DP&E were notified of the exceedance of the 115 dB limit on 14/12/16. The resulting exceedance did not exceed the 120 dB max criteria or the annual limit for blasting.</p> <p>Cooma Road Quarry enters blast monitoring data into a database on a fortnightly basis which is consequently published to the Holcim webpage¹ (as required by the Cooma Road Quarry EPL). Cooma Road Quarry will continue to monitor blasts and enter blast monitoring data on a fortnightly basis. The Holcim Planning & Environment team will continue to work with the Cooma Road Quarry Manager to ensure that exceedances are identified and that appropriate stakeholders are notified as soon as practical.</p> <p>If more than one exceedance occurs in a three month period, a review will be undertaken of the blasting procedure and DP&E (and any other stakeholders) will be provided with the review report.</p> <p>Responsibility: Planning & Environment Team and Quarry Manager</p> <p>Date: Quarter 1, 2018</p>
Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance														
	120	10	0%														
Any residence on privately-owned land	115	5	5% of the total number of blasts over a period of 12 months														
3	20	<p>The Applicant must prepare and implement a Water Management Plan for the development to the satisfaction of the Secretary. This plan must be prepared in consultation with the EPA and DPI Water by suitably qualified and experienced person/s whose appointment has been approved by the Secretary, and be submitted to the Secretary for approval within 6 months of the date of this consent. This plan must include a:</p> <p>(a) Site Water Balance that includes details of:</p> <ul style="list-style-type: none"> • sources and security of water supply, including contingency planning; • water use on site; and 	Observation	<p>The Water Management Plan has been submitted but approval from the Secretary/Director-General has not been received as at the time of the audit (01 Dec 2017).</p> <p>Recommendation: DPI Water be contacted regarding finalisation of the Water Management Plan.</p>	<p>Holcim will engage a suitably qualified and experienced person/s to assist with the finalisation of the Water Management Plan through consultation with DPI Water.</p> <p>Responsibility: Planning & Environment Team</p> <p>Date: Quarter 2, 2018</p>												

¹ Pollution monitoring data, <http://www.holcim.com.au/en/sustainability/environment/pollution-monitoring-data.html>

		<ul style="list-style-type: none"> • measures that would be implemented to minimise use of clean water and maximise recycling of dirty water on the site; (b) Surface Water Management Plan that includes: <ul style="list-style-type: none"> • baseline data on surface water flows and quality in the watercourses that could be affected by the development; • a detailed description of the surface water management system on site, including the design objectives and performance criteria for the: <ul style="list-style-type: none"> - clean water diversions; - erosion and sediment controls; - water storages (including Maximum Harvestable Rights requirements); and - control of water pollution from areas of the site that have been rehabilitated; • performance criteria, including trigger levels for investigating any potentially adverse surface water quality impacts; • a program to monitor: <ul style="list-style-type: none"> - any surface water discharges; - the effectiveness of the water management system; - surface water flows and quality in local watercourses; and - ecosystem health of local watercourses; (c) Groundwater Monitoring Program that includes: <ul style="list-style-type: none"> • baseline data of groundwater levels surrounding the development; • groundwater assessment criteria based upon analysis of baseline data for groundwater, including trigger levels for investigating any potentially adverse groundwater impacts; and • a program to monitor and/or validate the impacts of the development on groundwater resources; (d) Surface and Ground Water Response Plan that describes the measures and/or procedures that would be implemented to: <ul style="list-style-type: none"> • respond to any exceedences of the surface water and groundwater assessment criteria; and • mitigate and/or offset any adverse impacts on surface water and groundwater resources located within and adjacent to the site. <p>The Applicant must implement the approved management plan as approved from time to time by the Secretary</p>			
3	24	<p>The Applicant must prepare and implement a Rehabilitation Management Plan for the development to the satisfaction of the Secretary. This plan must:</p>	Administrative non-compliance	The Rehabilitation Management Plan has been submitted to DPI, NOW and Council but not yet approved.	Holcim will engage a suitably qualified and experienced person/s to assist with the finalisation of the Rehabilitation Management Plan

		<p>(a) be prepared in consultation with DRE, DPI, DPI Water and Council;</p> <p>(b) be submitted to the Secretary for approval within 12 months of the date of this consent;</p> <p>(c) describe the short, medium and long term measures that would be implemented to:</p> <ul style="list-style-type: none"> • manage remnant vegetation and habitat on site; • ensure compliance with the rehabilitation objectives and progressive rehabilitation obligations in this consent; <p>(d) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site, including triggering remedial action (if necessary);</p> <p>(e) include a detailed description of the measures that would be implemented over the next 3 years, including the procedures to be implemented for:</p> <ul style="list-style-type: none"> • ensuring compliance with the rehabilitation objectives and progressive rehabilitation obligations in this consent; • enhancing the quality of remnant vegetation and fauna habitat; • establishing vegetation screening to minimise the visual impacts of the site on surrounding receivers; • restoring native endemic vegetation and fauna habitat within the rehabilitation area; • maximising the salvage of environmental resources within the approved disturbance area – including tree hollows, vegetative and soil resources – for beneficial reuse in the enhancement of the biodiversity areas or rehabilitation area; • collecting and propagating seed; • minimising the impacts on native fauna on site; • controlling weeds and feral pests; • controlling erosion; • controlling access; and • bushfire management; <p>(f) include a program to monitor and report on the effectiveness of these measures, and progress against the performance and completion criteria;</p> <p>(g) include details of who would be responsible for monitoring, reviewing, and implementing the plan;</p> <p>(h) provide details of the conceptual final landform and associated land uses; and</p> <p>(i) provide details of water management requirements and details of the final void in relation to water storage.</p> <p>The Applicant must implement the approved management plan as approved from time to time by the</p>		<p>Observation: Follow up as required to get Rehabilitation Management Plan approved.</p>	<p>through consultation with relevant stakeholders.</p> <p>Responsibility: Planning & Environment Team</p> <p>Date: Quarter 2, 2018</p>
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		Secretary			
3	30	<p>Prior to importing onto the site any recycled concrete or any other material that may be classified as a waste under the EPA Waste Classification Guidelines 2009 (or its latest version), the Applicant must obtain a 'resource recovery exemption' under the POEO Act and provide evidence of this exemption to the Department.</p> <p>Note: This condition does not apply to routine deliveries to the site.</p>	Not Compliant	<p>Concrete waste (from a concrete batching plant) is processed at the site.</p> <p>A Resource Recovery Exemption for that material has not been obtained.</p> <p>Recommendation: Apply for a Resource Recovery Exemption for the concrete wastes processed at the site.</p>	<p>Holcim will engage a suitably qualified person to assist with the applying for a Resource Recovery Exemption for the concrete waste processed at Cooma Road Quarry.</p> <p>Responsibility: Planning & Environment Team</p> <p>Date: Quarter 2, 2018</p>
3	31	<p>The Applicant must:</p> <p>(a) minimise the waste generated by the development; and</p> <p>(b) ensure that the waste generated by the development is appropriately stored, handled, and disposed of, to the satisfaction of the Secretary.</p>	Not Compliant	<p>No waste stockpile was observed during site inspection. Waste materials are sorted into 3 m³ bins.</p> <p>Waste management service by contractors – waste receipts were inspected – e.g. Remondis 30 June 2017, 31 Aug 2017; Southern Oil (waste oil) on 11 Nov 2017; Southern Oil (waste filter) on 11 Oct 2017.</p> <p>Waste oil is managed in a bunded area. One open waste oil drum for temporary storage was sighted outside the bund. The auditees mentioned that this area is served by an oil/grease separator with hardstand sloping towards a capture drain. However, the area is not protected by any bunds and stormwater or surface water contamination is possible during storm events.</p> <p>Recommendation: It is recommended that this waste oil drum be kept in a drip tray or other suitable mechanism to avoid any leaks affecting stormwater runoff.</p>	<p>Holcim has a comprehensive Environmental Management System (EMS) that addresses environmental risks associated with operational aspects related to quarrying. Chapter 6.11 of the Holcim EMS provides guidelines on the Storage of Liquid Fuels & Chemicals. Holcim's Quarry Manager will review Chapter 6.11 of the Holcim EMS and will hold a toolbox talk for Cooma Road Quarry employees. Environmental hazards will continue to be recorded using Holcim's internal reporting software – INX.</p> <p>Responsibility: Quarry Manager</p> <p>Date: Quarter 1, 2018</p>
5	4	<p>With 3 months of the submission of an:</p> <p>(a) incident report under condition 7 below;</p> <p>(b) Annual Review under condition 9 below;</p> <p>(c) audit report under condition 10 below; and</p> <p>(d) any modifications to this consent,</p> <p>The applicant must review, and if necessary revise, the strategies, plans and programs required under this consent, to the satisfaction of the Secretary.</p>	Not Compliant	<p>The Environmental Management Strategy has not been revised since March 2014, as per the Strategy available on the Holcim website². Annual Review report for 2016 mentions the Modifications to SSD_5109 (page 6).</p> <p>Evidence for review of the Strategy</p>	<p>Develop a Minutes template for recording meetings and/or reviews associated with strategies, plans and programs. Should a revision be required, the strategy, plan and/or program will be updated and submitted to DP&E as well as other relevant stakeholders.</p>

² http://www.holcim.com.au/fileadmin/templates/AU/doc/Community_Link/Cooma_Road/EnvironmentalMgtPlans/EnvironmentalMgtStrategy.pdf

		<p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</p>		<p>following modifications to the consent SSD 5109 as per the August 2016 Modification was not provided to the Auditor.</p> <p>Recommendation: Prepare and save minutes of meetings where documentation Management Reviews and/or procedural document reviews are undertaken.</p>	<p>Responsibility: The Planning & Environment team</p> <p>Date: Quarter 1, 2018</p>
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Table 2. Environment Protection License (EPL) 1453

Condition	Condition Description/Requirement	Compliance	Comments and Recommendations	Holcim Response
01.1	<p>Licensed activities must be carried out in a competent manner. This includes:</p> <p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	Not Compliant	<p>No waste stockpile was observed during site inspection. Waste materials are sorted into 3m3 bins.</p> <p>Waste management service by contractors – waste receipts were inspected – eg Remondis 30 June 2017, 31 Aug 2017; Southern Oil (waste oil) on 11 Nov 2017; Southern Oil (waste filter) on 11 Oct 2017.</p> <p>Waste oil is managed in a bunded area. One open waste oil drum for temporary storage was sighted outside the bund. The auditees mentioned that this area is served by a oil/grease separator with hardstand sloping towards a capture drain. However, the area is not protected by any bunds and stormwater or surface water contamination is possible during storm events.</p> <p>Recommendation: Refer to MCoA Schedule 3 Condition 31 above.</p>	<p>Holcim has a comprehensive Environmental Management System (EMS) that addresses environmental risks associated with operational aspects related to quarrying. Chapter 6.11 of the Holcim EMS provides guidelines on the Storage of Liquid Fuels & Chemicals whilst Chapter 6.13 provides guidelines on Waste Management. Holcim's Quarry Manager will review Chapter 6.11 and 6.13 of the Holcim EMS and will hold a toolbox talk for Cooma Road Quarry employees. Environmental hazards will continue to be recorded using Holcim's internal reporting software – INX.</p> <p>Responsibility: Quarry Manager</p> <p>Date: Quarter 1, 2018</p>
M2.2	<p>The record must include details of the following:</p> <p>a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.</p>	Observation	<p>The required details of complaints, action and status are recorded in the incident report form.</p> <p>The method by which the complaint was made is not clear on the two extracts presented.</p> <p>Recommendation: all required details should be noted on the forms.</p>	<p>Noted. Holcim will continue to record community complaints using Holcim's internal reporting software – INX. Cooma Road Quarry Manager will hold a toolbox talk for Cooma Road Quarry employees explaining the details that must be entered into INX following a community complaint.</p> <p>Responsibility: Quarry Manager</p> <p>Date: Quarter 1, 2018</p>
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <p>a) a Statement of Compliance; and b) a Monitoring and Complaints Summary.</p> <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	Not Compliant	<p>The 2017 (1 May 2016 – 30 Apr 2017) Annual Return Form G Statement of Compliance is incomplete. The blasting complaint of March 2017 (as noted in the INX extract) is not noted in the 2017 Annual Return (a similar complaint in 2014 was noted in the 2014 Annual Return).</p> <p>Recommendation: Annual Reports should</p>	<p>Noted. Annual Returns are coordinated by Holcim's Executive Support team. From now on, this team will ensure that the document is reviewed and signed by the Quarry Manager.</p> <p>Responsibility: Executive Support team/Planning & Environment team/Quarry Manager</p>

			be complete and signed off by relevant senior personnel.	Date: Quarter 1, 2018
R1.7	<p>Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:</p> <p>a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.</p>	Administrative Non-Compliance	<p>Annual Returns for 2014, 2015 and 2016 are signed by Director and Secretary.</p> <p>Observation: Annual Return for 2017 is not signed on form H.</p>	<p>Noted. Annual Returns are coordinated by Holcim's Executive Support team. From now on, this team will ensure that the document is reviewed and signed by the Quarry Manager.</p> <p>Responsibility: Executive Support team/Planning & Environment team/Quarry Manager</p> <p>Date: Quarter 1, 2018</p>
R2.2	<p>The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.</p> <p>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p>	Not Compliant	<p>There have been no serious environmental harm incidents occurred on site. Any environmental incidents should be included in the Annual Returns; However, Annual Return 2017 (01/5/16 – 30/4/17) form C did not include the one instance of lower than limits pH (6.3 against lower limit of 6.5) as noted on 1 Sept 2016 (AEMR 2016 and Attachment 4.1H Environmental Monitoring Worksheet for 1/9/16 – 15/9/16).</p> <p>Recommendation: Make sure Annual Reports are complete and include all relevant information.</p>	<p>Quarry Manager will be up-skilled to understand notification requirements.</p> <p>Responsibility: Planning & Environment team</p> <p>Date: Quarter 1, 2018</p> <p>Annual Returns are coordinated by Holcim's Executive Support team. From now on, this team will ensure that the document is reviewed and signed by the Quarry Manager.</p> <p>Responsibility: Executive Support team/Planning & Environment team/Quarry Manager</p> <p>Date: Quarter 1, 2018</p>
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Not Verified	Auditees advised that it is kept in Permit Compliance Folder in the weighbridge office.	<p>Noted. Holcim have a permit compliance folder on-site however this should be audited to check it contains all relevant approvals, licences and/or permits.</p> <p>Responsibility: Quarry Manager</p> <p>Date: Quarter 4, 2018</p>

Table 3. Water Licence 40WA413082

Condition	Condition Description/Requirement	Compliance	Comments and Recommendations	Holcim Response
1	<p>A logbook must be kept and maintained at the authorised work site or on the property for each water supply work authorised by this approval, unless the work is metered and fitted with a data logger.</p> <p>A logbook is a document, electronic or hard copy, that records specific required information.</p> <p>A metered water supply work is a water supply work fitted with a data logger and a meter that complies with Australian standard AS 4747: meters for non-urban water supply.</p>	Not Compliant	<p>Two spreadsheets are maintained for plant water usage and water usage vs rainfall. Such information for past years could not be verified as only 2017 logbooks were available at the audit. The plant water usage spreadsheet for 2017 indicates process water usage and total water usage as per meter reading. Data is available January to November 2017 at the time of this audit.</p> <p>The Water Licence number and other specific details on the logged meter/water source are not noted in the logbooks. Recommendation: update the logbook with required specific details.</p>	<p>Holcim will update the logbook with the required information. The Quarry Manager will continue to log details of water usage as well as additional information required as per logbook update.</p> <p>Responsibility: Planning & Environment Team and Quarry Manager</p> <p>Date: Quarter 4, 2018</p>
2	<p>The purpose or purposes for which water is taken, as well as details of the type of crop, area cropped, and dates of planting and harvesting, must be recorded in the logbook each time water is taken.</p>	Not Compliant	<p>Water metering reading for general use and process water use at plant are noted in the spreadsheet. Only total water usage per month for quarry water usage is available.</p> <p>Recommendation: update the logbook with required specific details.</p>	<p>Holcim will update the logbook with the required information. The Quarry Manager will continue to log details of water usage as well as additional information required as per logbook update.</p> <p>Responsibility: Planning & Environment Team and Quarry Manager</p> <p>Date: Quarter 4, 2018</p>
3	<p>Where a water meter is installed on a water supply work authorised by this approval, the meter reading must be recorded in the logbook before taking water. This reading must be recorded every time water is to be taken.</p> <p>A water meter is a device that measures the volume of water that is extracted over a known period of time. Examples of a water meter may include a mechanical meter, electromagnetic meter, channel meter with mobile phone, or an authorised meter equivalent.</p>	Not Compliant	<p>Logbook entries are per monthly water consumption, not per water extraction. Reading is not recorded every time water is taken.</p> <p>Recommendation: update the logbook with required specific details.</p>	<p>Holcim will update the logbook with the required information. The Quarry Manager will continue to log details of water usage as well as additional information required as per logbook update.</p> <p>Responsibility: Planning & Environment Team and Quarry Manager</p> <p>Date: Quarter 4, 2018</p>
4	<p>Before water is taken through the water supply work authorised by this approval, confirmation must be recorded in the logbook that cease to take conditions do not apply and water may be taken.</p> <p>The method of confirming that water may be taken, such as visual inspection or internet search, must also be recorded in the logbook.</p> <p>If water may be taken, the:</p>	Not Compliant	<p>Date, time and licence or approval number is not recorded in the logbook.</p> <p>Recommendation: Logbooks for WAL 413082 include all required information, including date, time and licence or approval number.</p>	<p>Holcim will update the logbook with the required information. The Quarry Manager will continue to log details of water usage as well as additional information required as per logbook update.</p> <p>Responsibility: Planning & Environment Team and Quarry Manager</p> <p>Date: Quarter 4, 2018</p>

	<p>a. date, and b. time of the confirmation, and c. flow rate or water level at the reference point in the water source must be recorded in the logbook.</p> <p>Visual inspection means to physically inspect the gauge (or reference point) and confirm flow rate or water level by eye. Internet search means to confirm the flow rate or water level at the appropriate gauge by checking the correct website. Cease to take conditions means any condition on this approval, or on the access licence under which water is proposed to be taken, that prohibits the taking of water in a particular circumstance.</p>			
5	<p>Once the approval holder becomes aware of a breach of any condition on this approval, the approval holder must notify the minister as soon as practicable. The minister must be notified by:</p> <ol style="list-style-type: none"> email: information@water.nsw.gov.au, or by telephone: 1800 353 104. Any notification by telephone must also be confirmed in writing within seven (7) business days of the telephone call. 	Observation	<p>Recommendation: The water approval related Non- Compliances described in this audit should be reported as per this condition.</p>	<p>Holcim will report the non-compliances identified by this audit to DPI Water.</p> <p>Responsibility: Planning & Environment Team</p> <p>Date: Quarter 1, 2018</p>
8	<p>The following information must be recorded in the logbook for each period of time that water is taken:</p> <ol style="list-style-type: none"> date, volume of water, start and end time when water was taken as well as the pump capacity per unit of time, and the access licence number under which the water is taken, and c. the approval number under which the water is taken, and the volume of water taken for domestic consumption and/or stock watering. a logbook is a document, electronic or hard copy, that records specific required information. 	Not Compliant	<p>The logbook contains monthly total water usage only. It doesn't have date, time, volume of each water draw, access licence number etc.</p> <p>Recommendation: update the logbook with required information.</p>	<p>Holcim will update the logbook with the required information. The Quarry Manager will continue to log details of water usage as well as additional information required as per logbook update.</p> <p>Responsibility: Planning & Environment Team and Quarry Manager</p> <p>Date: Quarter 4, 2018</p>