



Bass Point Quarry

Follow-up Action Plan Compliance Response 2019

Task Number	Comments	Hanson Action Details	Dates/Justification
N1.	<p>While a site induction is provided, the site induction does not include specific requirements for environmental management of the site.</p> <p>Recommendation: Update the Site induction to include information on site environmental aspects, impacts and controls.</p>	<p>Please note that the following is currently included within the induction documentation:</p> <p><i>Environmental Management & Controls:</i></p> <ul style="list-style-type: none"> • <i>Show site license/EMP and explain meaning, any special conditions e.g dust, noise, spillage, also any sensitive areas e.g streams or rivers.</i> • <i>Requirement to immediately report any spill or breach.</i> • <i>Aspect and Impact register</i> • <i>How individuals can contribute to reducing environmental impact.</i> • <i>Show location of the site spill kits and overview on how to use them</i> <p>Hanson has updated the site induction to specifically discuss site requirements involving:</p> <ul style="list-style-type: none"> • EECs • potential water quality impacts • weed management • dust and noise 	<p>Update to the site induction has been completed.</p> <p>No further action required.</p>
N2.	<p>All Controls identified to mitigate particulate matter emissions in Section 8 of the AQMP have not been implemented.</p> <p>No shaker grids had not been installed.</p> <p>Vacuuming / sweeping of dirt track-out out onto public roads was not conducted.</p> <p>Recommendation: Implement all measures for managing dust emissions identified in the AQMP.</p>	<p>Update the AQMP to reflect mitigation controls that are implemented on the site.</p> <p>A street sweeper is once a week on the Council road connecting Bass Point Quarry Road from the quarry to the State highway. This was explained to the auditor at the time of the audit.</p> <p>Additionally there are spray bars prior to the weigh bridge that all heavy vehicle transport is required to go through before leaving the site. The spray jets wash the truck wheels which negates the need for shaker grids.</p>	<p>Updated AQMP draft to be submitted for review to DPE and EPA within three months of the 2018 Annual Review Submission.</p>
N3.	<p>Noted that some oil drums, while stored on banded pallets, were not stored such that spills would be collected in the bund.</p> <p>Minor spillage of oils outside of banded area sighted (spills within the building on concrete floor).</p>	<p>Site staff has been notified of the correct process regarding oil drum storage within banded pallets (Auditor noted that one banded pallet can only hold one oil drum. At the time of the audit he noted that one banded pallet was holding four oil drums).</p>	<p>Due to delays in the finalising of the new storage area for oil this has not been completed by stated date.</p> <p>Education on storage requirements</p>

	<p>Recommendation: Ensure all oils and chemicals are stored in accordance with AS1940-2004. Minor spills should be cleaned up to prevent migration of spilt material.</p>	<p>Additionally site staff has been updated on oil spillage protocol, which is included in the site induction.</p> <p>Create new dedicated storage area for oil drums.</p>	<p>of oil drums has been reiterated to staff including oil drum storage and oil spillage protocol.</p>
N4.	<p>For the 2017 period, the annual average dust deposition level for DDG 02 was reported as 3.4 g/m²/mth, although this was with the removal of the February 2017 result of 11.1 g/m²/mth, which was considered anomalous. No reason for exclusion of the result was provided. Inclusion of the February result elevates the annual average to 4.3 g/m²/mth.</p> <p>Results for the first 5 months of 2018 for DDG2 were all above 4.0 g/m²/mth.</p> <p>Records showed that exceedences had been discussed with the EPA, and were considered to be due to works on the adjacent marina development, not associated with the quarry activities.</p> <p>During the site inspection, it was noted that earthworks associated with the marina development were being conducted in close proximity to the dust gauge DDG2.</p> <p>Results for DDG 01, have consistently been below the annual average criterion, with the annual average for 2017 being below 2mg/m²/month.</p> <p>PM10 level 19/03/18 - 57.9µg/m³ (24 hour average <50µg/m³). No formal assessment has been undertaken to determine the cause and actions to reduce dust deposition levels, and a report provided to the Secretary describing remediation options and any preferred remediation measures or other course of action.</p> <p>Recommendation: Review process for management of dust exceedences. Ensure reports are provided to the Secretary as required by Schedule 5, condition 2.</p>	<p>Incorporation of a review schedule by a dedicated person on a monthly basis</p> <p>Documentation kept for every investigation carried out.</p> <p>Discuss with EPA and DPE regarding moving the DDG to a more suitable location.</p>	<p>2018 results have been investigated and a report has been submitted to DPE and EPA regarding the DDG2 exceedance.</p> <p>An amendment to EPL 2193 has been submitted to relocate DDG2 to a more representative location. Once approved the AQMP will be updated to reflect the change in location.</p>
N5.	<p>While water quality results were provided in the annual review on the company website, regular reporting of water quality results was not provided on the website.</p> <p>Recommendation: Upload water quality results to the website basis as results become available.</p>	<p>Provide water quality results to be uploaded onto the website on a monthly basis.</p> <p>Results for 2018 to be compiled into singular document.</p> <p>Monthly results to be provided 2019 onwards with results</p>	<p>2018 results will be available in the 2018 annual review.</p> <p>2019 water quality results will be uploaded monthly onto the Bass Point Quarry Hanson website.</p>

		compiled at the end of the year to ease of navigation on the website	
N6.	<p>Two environmental incidents had occurred where the EPA had requested written reports to be provided.</p> <p>No record that a report had been provided to the EPA.</p> <p>Recommendation: Provide written report to the EPA for incidents causing or threatening to cause environmental harm, or where requested by EPA.</p>	<p>Steve Butcher has indicated that he provided written correspondence with EPA at time of audit.</p> <p>Steve to provide written documentation/evidence of incidents.</p> <p>Develop a protocol when an environmental incident/potential environmental incident has occurred. Nominate personnel to take ownership of reporting incidents.</p>	<p>The incident report relating to the oil spill has been provided to the DPE.</p> <p>DPE have also been provided details on the blast exceedance which, when further investigation occurred, did not actually breach limits set out within the project approval.</p> <p>The Bass Point Quarry Compliance Officer is now the point-of-call regarding environmental incident/potential environmental incident reporting with support from the Grad. Environmental Compliance and Planning Coordinator. Both employees understand the requirements to report to all relevant government agencies should an environmental incident occur at the Quarry in the future.</p>
N7.	<p>No procedure was available for stockpiling to instruct drivers on how to construct stockpiles.</p> <p>Reported that verbal instructions were provided.</p> <p>Recommendation: Prepare procedure for salvage of topsoil and vegetation resources. Provide training and instruction to drivers in the procedure.</p>	<p>Steve Butcher to develop procedure for salvage of topsoil and vegetation resources.</p> <p>Provide training and instruction to drivers in the procedure before works begin.</p>	Completed.
N8.	<p>No records available to verify quarterly visual inspections had been undertaken.</p> <p>Recommendation: Maintain records of quarterly visual inspections. Consider preparing checklist to assist in undertaking</p>	Develop quarterly visual inspections, to be undertaken by Quarry Manager and Compliance Officer.	Completed.
N9.	<p>Records of inspections not available.</p> <p>Recommendation: Undertake inspections as required by the EMS 4.1. Consider preparing checklist to assist in undertaking and recording inspection outcomes.</p>	<p>In accordance with 4.1 of BPQ EMS:</p> <p>Monitoring plan to include: Check basin structural integrity, check outlet for signs of scour/failure, check sediment volume, check and record water level.</p>	Completed.

		<p>Quarterly inspection by Quarry personnel to visually establish the condition of vegetation, evidence of dieback and weed coverage.</p> <p>Develop an inspection checklist that covers off the required inspection from 4.1 of the BPQ EMS.</p>	
A1.	<p>Transport data records show exceedances of hourly limits for maximum laden truck despatches. Reported to be due to either split loads, internal movements being recorded or loads being reallocated (time of reallocation recorded, not the time of transport from site).</p> <p>Recommendation: Review process for recording of truck movements to determine if the time of time of despatch from site can be recorded.</p>	<p>Limitations of the software due to compliance with chain of responsibility legislation and the requirements within the software for drivers to have mandatory breaks. If a truck is preloaded the night before, it will be in the system long enough to create issues regarding process. This is reason why the load is ticketed when a pre-loaded truck arrives at the destination plant/when reallocation occurred.</p>	N/A
A2.	<p>Initial Environmental Management Strategy submitted and approved by DP&E. Verified previous audit.</p> <p>Updated March 2017</p> <p>Approved by DP&E 9 April 2018.</p> <p>Evidence of consultation not included in the updated EMS approved 9 April 2018.</p> <p>Recommendation: Include evidence of consultation in the EMS.</p>	<p>Confirm what consultation documents are required within the EMS.</p>	<p>Consultation has been provided as Appendix A in the draft Environmental Management Strategy which will be submitted to DPE within three month of the 2018 Annual Review submission.</p>
A3.	<p>Records did not show that reviews of documents were conducted following submission of the annual reviews or following completion of the previous audit report in 2015.</p> <p>Recommendation: Review strategies, plans and programs within 3 months of submission of the annual review, an incident or audit report. Provide notification of the review to the Department, and revised documents within 6 weeks of the review.</p>	<p>Notification will be given to DPE when an annual review, incident or audit report has been undertaken at the site.</p> <p>Melissa Anderson was contacted regarding the review of the BPQ management plants within 3 months of the submission of the audit report.</p> <p>Ongoing, the Grad. Environmental Compliance and Planning Coordinator will be providing notification to DPE regarding management plan review after the submission of an annual review, an incident or audit report.</p>	<p>When required/ongoing.</p>
A4.	<p>9/02/18 – Blast exceedance 24/11/17 Precoat spill contained on site.</p> <p>Incidents reported to the EPA. No reports provided to the Secretary.</p>	<p>The blast exceedance noted by the auditor on the 9/02/2018 was a peak recorded before the blast. The monitoring records indicate this and can be provided to DPE.</p>	<p>Pre-coat spill incident report has been submitted to DPE. Information regarding the reported blast exceedance has been provided to DPE.</p>

	Recommendation: Ensure incident reports are provided to the Secretary within 7 days of the date of the incident.		
A5.	<p>Audit commissioned 29/06/15. Draft submitted to Hanson 14/09/15. Email sent to DG 30/11/15 re delays.</p> <p>Audit report not submitted within 3 months of commissioning of the audit. Audit report submitted 14/12/15.</p> <p>Recommendation: Ensure audits are provided to the Secretary within 3 months of commissioning of the audit, or as agreed with the Secretary.</p>	Noted.	N/A
A6.	<p>Auditor commissioned prior to 30 June 2018 to conduct audit. Determination January 2014. Initial audit commissioned 2015. This audit conducted 3 years after initial audit.</p> <p>Audits had not conducted in 2014 and 3 yearly thereafter.</p> <p>Recommendation: Clarify timing of audits with the Secretary. Undertake audits in accordance with agreed requirements.</p>	Request clarification on when DPE would prefer the audits to be submitted - Continue on current three year cycle?	<p>Clarification received from Georgia-DPE that the next audit is to occur 2020.</p> <p>No further action required.</p>
A7.	<p>Audit commissioned 29/06/15. Draft submitted to Hanson 14/09/15. Email sent to DG 30/11/15 re delays.</p> <p>Audit report not submitted within 3 months of commissioning of the audit. Audit report submitted 14/12/15.</p> <p>Recommendation: Ensure audits are provided to the Secretary within 3 months of commissioning of the audit, or as agreed with the Secretary.</p>	Noted.	N/A
A8.	<p>The Complaints Register does not include the personal details of the complainant or, if no such details were provided, a note to that effect.</p> <p>Recommendation: Update the complaints register to include all required information.</p>	<p>The complaints register has been updated to include a column for personal details (if complainant wants to provide personal information).</p> <p>If complainant refuses to provide details, note it within the complaints register.</p>	No further action required.
A9.	<p>Blast records did not include evidence that during the past 12 month period, a calibration check had been carried out on each blast monitor.</p> <p>Recommendation: Include blast monitor calibration records in blast records.</p>	<p>Noted.</p> <p>One calibration check on one monitor was missed when auditor was reviewing records. Calibration was performed in August for 2018.</p>	N/A
A10.	Current location of the eBAM does not conform to the requirements	An alternative location has been discussed with land	BAM has been moved to the new

	<p>of AS 3580.1.1:2007. To be re-sited on completion of the redevelopment of the site. Located in accordance with the identified location in the AQMP. No siting documentation was maintained to record deviations from the standard.</p> <p>Recommendation: Ensure siting documentation is provided and</p>	<p>managers of Killalea lagoon.</p> <p>Potential location to be approved by EPA and DPE for approval.</p>	<p>office following AS 3580.1.1:2007.</p> <p>No further action required.</p>
A11.	<p>The annual review included reporting on water management (Section 6.7). :</p> <ul style="list-style-type: none"> • Rainfall and evaporation conditions for the calendar year. • Record of discharge events during the year. • Records of sedimentation basin inspection, sampling, testing and maintenance • Comparison of records with the previous year and any long term observations/trends. • No audit conducted. <p>Recommendation: Review Annual review prior to release to ensure that all required information is included.</p>	<p>Noted.</p>	<p>To be included in the 2018 annual review.</p>
A12.	<p>Loggers have been installed at 6 locations, including conductivity at one location. BH01, B1202, B1203, BT703, BH3, BH4. (BH01 – removed due to quarry activity) PP04 – Conductivity only (actually BT 0701). Water level and temperature are continuously monitored at B1202, B1203, BT703, BH3, BH4 Conductivity continuously monitored at PP04. Monitoring by ALS monthly, for EC, temperature and depth at 0702, 0703 and 1202.</p> <p>Monitoring has not been conducted at BT702.</p> <p>Recommendation: Implement monitoring of groundwater at well BT702 in accordance with the GMP.</p>	<p>Install a monitor within BT702.</p>	<p>Logger to be installed at BT702 by the end of April 2019 – the monument that houses the borehole has rusted and will need to be repaired for access to the bore.</p>
A13.	<p>Annual Review report completed and provided to DP&E. Section 6.8 includes groundwater monitoring and reporting requirements. Includes:</p> <ul style="list-style-type: none"> • Operations summary; • Summary of groundwater monitoring; • Comparison of records with the previous year and any long 	<p>Noted.</p>	<p>To be included in the 2018 annual review.</p>

	<p>term observations/trends;</p> <ul style="list-style-type: none"> • Identification of any exceedences and discussion on significance of these. • Any recommendations for modification of the monitoring regime as required. <p>Does not include: Rainfall and evaporation conditions for the calendar year</p> <ul style="list-style-type: none"> • Comparison of results with baseline data set and trigger values. <p>An audit of the groundwater management and monitoring system in light of comparison with baseline and previous monitoring records.</p> <p>Recommendation: Review Annual review prior to release to ensure that all required information is included.</p>		
A14.	<p>Preclearance survey (15/05/18) from Biosis for western boundary works. Not commenced at time of audit. Preclearance survey (1/03/18) from Biosis for western boundary works. Clearance being undertaken at the time of audit.</p> <p>The preclearance survey had recommended a pre-clearance survey by a qualified ecologist prior to works being undertaken for frogs and mammals, and an ecologist be on site while clearing was being undertaken. Neither of these recommendations had been implemented.</p> <p>Recommendation: Implement recommendations as provided in preclearance surveys. Where recommendations are not implemented, maintain records of review and reason for rejection of recommendations.</p>	<p>Noted.</p> <p>Frog and mammal surveys were conducted when deemed necessary, for example when in close proximity to Killalea lagoon.</p> <p>Ongoing, when recommendations are not implemented – records will be maintained for review and reasoning for rejection of recommendations. This will be included within the Annual Review.</p>	Ongoing.
A15.	<p>Tubestock purchased was not consistent with the requirements of the LMP (i.e. 75% of species from the list in Appendix B).</p> <p>Tubestock purchased from local supplier –Jambaroo</p> <p>Recommendation: Ensure tubestock provided to site is consistent with the requirements of the LMP.</p>	<p>The reiteration of the importance of following the tubestock listing in Appendix B of the LMP has been communicated to quarry management.</p>	No further action.
A16.	<p>Noise monitoring results had been conducted monthly by an external consultant in January and February 2018. Monitoring reports include reporting on LAeq and LA1, 1 min as</p>	<p>Harwood Acoustics have been notified of the requirements to include LAm_{ax}, LA10, LA50, LA90, LA99, LA_{min} within future noise monitoring reports (November</p>	No further action.

	<p>required by the conditions of consent.</p> <p>LAmx, LA10, LA50, LA90, LA99, LAmin not included in report.</p> <p>Recommendation: Ensure noise monitoring and reporting includes all required noise monitoring variables.</p>	2018).	
A17.	<p>Chain of Custody form does not include reporting on visual assessment of water quality conditions. Sampling register not maintained. Photographs of the lagoon condition were not taken at time of monitoring.</p> <p>Recommendation: Maintain records of visual inspection of lagoon conditions, including photographs.</p>	ALS has been notified of the requirements to maintain records of visual inspection of lagoon conditions, including photographs (November 2018).	No further action.
A18.	<p>Monthly results from ALS available.</p> <p>While a logger has been installed, the standpipe for housing the logger was not in water, hence there was no data to collect.</p> <p>Recommendation: Install standpipe and logger in water to enable water level and temperature to be monitored and recorded.</p>	<p>Discuss with land managers of Killalea lagoon the installation of a new standpipe.</p> <p>Install logger as soon as practically possible.</p>	<p>Logger has been installed.</p> <p>No further action required.</p>
A19.	<p>Annual review includes monitoring data from ALS sampling.</p> <p>Does not include:</p> <ul style="list-style-type: none"> • Rainfall and evaporation conditions for the calendar year. • An audit of the lagoon management and monitoring system in light of comparison with baseline and previous monitoring records. <p>Recommendation: Review Annual review prior to release to ensure that all required information is included.</p>	Make sure the annual review has all the required information included.	To be included within the 2018 Annual Review.
A20.	<p>Regional destination included in summary for 2016 but not included in 2017 or 2018 data provided on website.</p> <p>Recommendation: Ensure the regional destination of quarry products is uploaded with transport records onto the company website.</p>	Update 2017 and 2018 transport data to include regional destination data for the year.	To be included within the 2018 Annual Review.
A21.	<p>Complaints register includes Data, Time, Mode of Complaint, Nature of Complaint, Complaint Comments and Action Taken.</p> <p>Does not include driver, heavy vehicle details, and contact details of the person lodging the complaint.</p> <p>Recommendation: Update the incident register to include all</p>	Create a transport incident register to address specifics in direct relation to transport incidents.	Completed.

	information as required by the TMP Section 3.2		
O1.	<p>Preclearance survey by ecologist only.</p> <p>No record of preclearance survey for aboriginal artefacts. Reported that the requirement for a preclearance survey for aboriginal artefacts was inadvertently included (carry over from another project).</p> <p>Recommendation: Update the EMS to reflect site requirements for preclearance surveys.</p>	Update the EMS to reflect site requirements for preclearance surveys.	EMS has been updated with the draft to be submitted to DPE within three months of the 2018 annual review submission.
O2.	<p>Loggers have been installed at 6 locations, including conductivity at one location.</p> <p>Quarry operations have not progressed below 0m AHD, hence no impacts on groundwater levels due to quarrying operations.</p> <p>Unable to identify the location of GMMW3.</p> <p>Recommendation: Clarify the location of GMMW3 with the consultant who prepared the Groundwater Management Plan to ensure appropriate monitoring is conducted at this location.</p>	Contact Martens to clarify the location of GMMW3.	Martens have been contacted regarding location of GMMW3.
O3.	<p>Reported that the Blast Emissions Site Laws were not updated following each blast as the site has a long history of blasting and was well aware of blast design requirements for the site.</p> <p>All blast emission data was reviewed, although a link between the review and refinement of site laws could not be established.</p> <p>Recommendation: Update the Noise and Blast Management Plan to reflect the current status of blast management.</p>	Update the NBMP to reflect the current status of blast management.	Draft to be sent to DPE within three months of the 2018 annual review submission.
O4.	<p>Pre-clearance survey by ecologist only.</p> <p>Reported that the requirement for a Pre clearance survey for heritage artefacts was not applicable to the site.</p> <p>Recommendation: Update the Environmental Management Strategy to remove reference to Pre-clearance survey for heritage artefacts.</p>	Update the EMS to reflect site requirements for preclearance surveys.	EMS Draft to be sent to DPE within three months of the 2018 annual review submission.