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Director-General
NSW Government
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

13 June 2017

Dear Sir/Madam

Hitchcock Road Sand Project (06_0104) Comments on Independent Environmental Audit

Under Clause 6 of Schedule 5 of the Notice of Project Approval dated 3 February 2010 we are required to commission an Independent Environmental Audit every three years. The first audit was completed in April 2011, the second audit was carried out in April 2014 and the most recent audit completed in April 2017 is enclosed. Our response to the audit recommendations outlined in Section 8 (page 46) of the report are detailed below:

1. *The Wisemans Ferry Road access road entry/exit to the site needs to be checked daily for mud and dirt and cleaned off as per the environmental commitments.*

Response - Agreed. Site checks are made daily, the water truck and mechanical sweeper are used to clean the intersection as required.

2. *The breach in the landscaped bund along the Hitchcock road frontage providing access to the site needs to be filled in and access provided either over the bund or a new offset bund provided behind the existing bund to allow vehicular access.*

Response - Agreed. A new offset bund has been constructed.

- 3. The dust gauge located at Jurd's property needs relocation to meet the requirements of AS/NZS 3580.1.1:2016 Methods for sampling and analysis of ambient air Part 1.1: Guide to siting air monitoring equipment.*

Response - Agreed. A copy of AS/NZS 3580.1.1:2016 *Methods for sampling and analysis of ambient air Part 1.1: Guide to siting air monitoring equipment* has been obtained and the Environmental Manager will look for a new location which complies with the standard.

- 4. A permanent survey marker showing Australian Height Datum needs to be established within the main pit so that maximum extraction levels can be surveyed from the benchmark as required. The maximum extraction depth levels for the project need to be monitored at least monthly to ensure compliance with the approved maximum extraction depth plan and the results recorded in future AEMRs.*

Response - Agreed. The site has since been surveyed by a registered surveyor and a benchmark has been installed in the main extraction pit. A dumpy level will be used to check extraction depths monthly from the benchmark.

- 5. A groundwater monitoring well needs to be established within the main pit with the monthly monitoring of groundwater levels to ensure maximum extraction levels are at least two meters above the established wet weather groundwater level. The groundwater levels need to be recorded in future AEMRs.*

Response - Agreed. A deep monitoring well has since been installed in the main extraction area of the site. A further three, deep monitoring wells and two shallow monitoring wells have also been installed. The additional groundwater information will be used to update the groundwater contour map and maximum depth of extraction map for the site.

- 6. The existing offset areas of rehabilitation need to be pegged out and established on a survey plan and shown in future AEMRs.*

Response - Agreed.

- 7. The long-term security for the off-set strategy needs to be resolved and agreed with the Department of Planning and Environment.*

Response - Agreed.

8. *The December 2015 aerial photograph of the site shown in Figure 1 should be updated to show contours with one metre intervals and this data and any future updates used to amend the Site Plan shown in Figure 2 and in future AEMRs.*

Response - Agreed. An updated aerial survey of the site has been carried out with contours mapped from surveyed control points. The survey will be used as a base plan for future site plans.

9. *The Department of Primary Industries – Water issues outlined in February 2017 need to be addressed and new information included in a revised Water Management Plan. The revised Water Management Plan also need to include procedures for monthly monitoring of maximum extraction depth levels from the groundwater monitoring well within the main pit.*

Response - Agreed. The Water Management Plan will be reviewed and updated to address the concerns raised by Department of Industry – Water. The annual Groundwater Report will contain additional groundwater information, including monitoring the levels of the clean water dam and the licensed spring on Por 167.

10. *The pollution incident response management plan should be amended to include a Hazardous Chemicals Register plus another Safety Data Sheet Register.*

Response – The Pollution Incident Response Management Plan has been amended to include one form known as *Form 42 – Hazardous Chemicals Register*. It is not necessary to have two forms as suggested.

11. *Both the Dangerous Hazardous Substance and Non-Dangerous Hazardous Substance Registers located in the weighbridge office need to be updated with nomenclature, a list of hazardous chemicals and safety data sheets to conform with the pollution incident response management plan.*

Response - Agreed. The classification of Dangerous and Non - Dangerous Hazardous substances is inconsistent and not required under the Work Health and Safety Regulation 2011. *Form 15A - Dangerous Hazardous Substances Register* and *form 15B – Non - Dangerous Hazardous Substances Register* will be amended to *Form 42 – Hazardous Chemicals Register* to ensure consistency with the Pollution Incident Response Management Plan.

12. *Future AEMRs should be based on the October 2015 NSW government publication Annual Review Guideline.*

Response - Agreed.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Joshua Graham', with a long horizontal flourish extending to the right.

Joshua Graham
Managing Director