METROMIX

Response to Audit Recommendations

for the

Teralba Quarry

Prepared by:

RWCorkery&co

March 2026

<table>
<tr><th>Issue No.</th><th>Condition</th><th>Requirement</th><th>Issue sighted</th><th>Recommendation</th><th>Metromix Response</th></tr>
<tr><td>NC-01</td><td>Schedule 2
Condition 2</td><td>The Proponent, in acting on this approval, must carry out the project in accordance with:
(a) the conditions of this approval; and
(b) all written directions of the Secretary</td><td>Non-compliances have been recorded against Conditions of Approval Schedule 3 (Conditions 17, 21, 23, 32, 60), Schedule 5 (Condition 7A, 7B, ,11).</td><td>It is recommended that all non-compliances identified are addressed and closed out. Consider implementing a process to track compliance requirements and status.</td><td>Noted.</td></tr>
<tr><td>NC-02</td><td>Schedule 3
Condition 17</td><td>Air Quality Criteria
The Proponent must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not exceed the criteria in Tables 5 to 7 at any residence on privately-owned land, or on more than 25% of any privately-owned land.
Table 5: Long-Term Impact Assessment Criteria for Particulate Matter
<table><tr><th>Pollutant</th><th>Averaging period</th><th>[d] Criterion</th></tr><tr><td>Total suspended particulates (TSP)</td><td>Annual</td><td>[a] 90 µg/m^3</td></tr><tr><td>Particulate matter < 10 µm (PM_{10})</td><td>Annual</td><td>[a] 30 µg/m^3</td></tr></table>Table 6: Short Term Impact Assessment Criteria for Particulate Matter
<table><tr><th>Pollutant</th><th>Averaging period</th><th>[d] Criterion</th></tr><tr><td>Particulate matter < 10 µm (PM_{10})</td><td>24 hour</td><td>[a] 50 µg/m^3</td></tr></table>Table 7: Long-Term Impact Assessment Criteria for Deposited Dust
<table><tr><th>Pollutant</th><th>Averaging period</th><th>Maximum increase in deposited dust level</th><th>Maximum total deposited dust level</th></tr><tr><td>[c] Deposited dust</td><td>Annual</td><td>[b] 2 g/m^2/month</td><td>[a] 4 g/m^2/month</td></tr></table>Notes to Tables 5-7:
• [a] Total impact (i.e. incremental increase in concentrations due to the project plus background concentrations due to all other sources);
• [b] Incremental impact (i.e. incremental increase in concentrations due to the project on its own);
• [c] Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method.
• [d] Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents, illegal activities or any other activity agreed by the Secretary in consultation with EPA.</td><td>PM_{10} monitoring identified two exceedances of the site criteria for particulates.
Exceedance on 2/09/2024 was attributed to smoke from bushfires in the region, while the result on 17/02/2025 was possibly related to mowing in the near vicinity of the PM_{10} monitor. Meteorological data indicated that winds during the sampling period were from the south, while the sampling location was east of the site.</td><td>Both exceedances were attributed to offsite activities. No further action required.</td><td>Metromix considers this issue is resolved and notes continued compliance with the air quality criteria.</td></tr>
<tr><td>NC-03</td><td>Schedule 3
Condition 21

EPL M4.1</td><td>For the life of the project, the Proponent must ensure that there is a suitable meteorological station operating in the vicinity of the site that:
• complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales guideline; and
is capable of continuous real-time measurement of temperature lapse rate, in accordance with the NSW Industrial Noise Policy, or as otherwise approved by EPA.</td><td>The weather station had failed on 3 occasions.
• 7 July 2024 to 18 July 2024 - failure to record continuous meteorological data due to a planned Telstra 3G network closure and modem upgrade.
• 7 August 2024 - equipment fault causing a failure to record continuous meteorological data.
• 1 September 2024 to 3 September 2024 - equipment fault causing a failure to record continuous meteorological data.</td><td>The Meteorological monitoring station has been repaired and fault parts replaced. A maintenance plan is in place for regular maintenance of the weather station.
No further action required.</td><td>Metromix considers this issue is resolved and notes continued compliance with the meteorological monitoring requirements.</td></tr>
</table>

Issue No.	Condition	Requirement	Issue sighted	Recommendation	Metromix Response
NC-04	Schedule 3 Condition 23 EPL L2.1	**Surface Water Discharges** The Proponent must ensure that all surface water discharges from the site comply with the discharge limits in any EPL which regulates water discharges from the site, or with section 120 of the POEO Act.	An exceedance of the TSS criterion was recorded at EPL Point 5 during discharge on 23/02/2023. The exceedance was identified as resulting from significant rainfall (200mm in 12 hours, exceeding the 5-day 90th percentile event of 51.8mm for the Newcastle Region).	Exceedances were attributed to significant rainfall rather than quarry related activities. No further action required.	A compliance inspection and weather forecast check is undertaken daily to ensure controls are effectively implemented. Metromix considers that the significant rainfall events and subsequent exceedances of the TSS criterion at EPL Point 5 were not under the control of Metromix. The Metromix monitoring system recorded these events, demonstrating the effectiveness of current management. Metromix intend to continue implementing water management in accordance with the approved Water Management Plan.
NC-05	Schedule 3 Condition 32 EPL O6.1 SoC 11.14	The Proponent must install truck wheel wash facilities within 6 months of the date of this approval at all quarry exits and following such installation, must ensure that all trucks have their tyres and vehicles cleaned of mud, dirt and dust prior to exiting the site, so as to avoid tracking dirt onto public roads, to the satisfaction of the Secretary.	During inspections conducted on 27 July 2023 and 18 August 2023 in response to a community report, EPA officers observed sediment tracking from the Quarry exit onto Rhondda Road (northwest bound lane) for approximately 1km in the northwest direction.	The wheel wash has been upgraded and daily monitoring of wheel wash is undertaken. During the site inspection, use of the wheel wash was demonstrated. No further action required.	Metromix considers this issue is resolved as actions have been taken in consultation with EPA to ensure sediment tracking onto Rhondda Road does not occur.
NC-06	Schedule 3 Condition 60	**Biodiversity and Rehabilitation Management Plan** The Proponent must prepare a Biodiversity and Rehabilitation Management Plan for the project to the satisfaction of the Secretary. This plan must: a) be prepared by a suitably qualified expert and in consultation with DRG, DPI and Council; b) be submitted to the Secretary for approval within 12 months of the date of approval of Modification 1; c) provide details of the conceptual final landform and associated land uses for the site; d) describe how the implementation of the Biodiversity Offset Strategy would be integrated with the overall rehabilitation of the site; e) describe the short, medium and long-term measures that would be implemented to: • manage remnant vegetation and habitat on site; • implement the Biodiversity Offset Strategy; and • ensure compliance with the rehabilitation objectives and progressive rehabilitation obligations in this approval; f) include detailed performance and completion criteria for evaluating the performance of the Biodiversity Offset Strategy and the rehabilitation of the site (including progressive rehabilitation), including triggering remedial action (if necessary); g) include a detailed description of the measures that would be implemented over the next 3 years, including the procedures to be implemented for: • ensuring compliance with the rehabilitation objectives and progressive rehabilitation obligations in this approval; • enhancing the quality of remnant vegetation and fauna habitat; • protecting and restoring native endemic vegetation and fauna habitat within any offset areas and rehabilitation areas;	The Biodiversity and Rehabilitation Management Plan does not clearly identify triggers for rehabilitation criteria or require qualitative monitoring of rehabilitation to compare against criteria.	The Biodiversity and Rehabilitation Management Plan should be reviewed and updated to clearly identify triggers for rehabilitation criteria and qualitative monitoring of rehabilitation to compare against criteria.	In accordance with Condition 5 of Schedule 5 of PA 10_0183, within three months of this audit report, Metromix will review and update the Biodiversity and Rehabilitation Management Plan to address this recommendation.

Issue No.	Condition	Requirement	Issue sighted	Recommendation	Metromix Response
		• 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; • ensuring minimal environmental consequences for the local *Tetratheca juncea* population; • protecting vegetation and fauna habitat outside the approved disturbance area on-site; • minimising the impacts on native fauna on site, including undertaking appropriate pre-clearance surveys; • controlling weeds and feral pests; • controlling erosion; • controlling access; and • bushfire management; h) include a program to monitor the effectiveness of these measures, and progress against the performance and completion criteria; i) identify the potential risks to successful implementation of the Biodiversity Offset Strategy and rehabilitation of the site, and include a description of the contingency measures that would be implemented to mitigate against these risks; and j) include details of who would be responsible for monitoring, reviewing, and implementing the plan. The Proponent must implement the plan as approved by the Secretary.			
NC-07	Schedule 3 Condition 60	**Biodiversity and Rehabilitation Management Plan** The Proponent must prepare a Biodiversity and Rehabilitation Management Plan for the project to the satisfaction of the Secretary. This plan must: a) be prepared by a suitably qualified expert and in consultation with DRG, DPI and Council; b) be submitted to the Secretary for approval within 12 months of the date of approval of Modification 1; c) provide details of the conceptual final landform and associated land uses for the site; d) describe how the implementation of the Biodiversity Offset Strategy would be integrated with the overall rehabilitation of the site; e) describe the short, medium and long-term measures that would be implemented to: • manage remnant vegetation and habitat on site; • implement the Biodiversity Offset Strategy; and • ensure compliance with the rehabilitation objectives and progressive rehabilitation obligations in this approval; f) include detailed performance and completion criteria for evaluating the performance of the Biodiversity Offset Strategy and the rehabilitation of the site (including progressive rehabilitation), including triggering remedial action (if necessary); g) include a detailed description of the measures that would be implemented over the next 3 years, including the procedures to be implemented for: • ensuring compliance with the rehabilitation objectives and progressive rehabilitation obligations in this approval; • enhancing the quality of remnant vegetation and fauna habitat; • protecting and restoring native endemic vegetation and fauna habitat within any offset areas and rehabilitation areas;	The following requirements of the Biodiversity and Rehabilitation Management Plan were not verified: • Management of weeds in the northern area. A significant infestation of *Lantana camara* was present • Assessment of fuel loads in accordance with Section 8.0 • Rehabilitation monitoring, including rehabilitation photograph analysis was not included in rehabilitation monitoring in the annual reviews.	Metromix need to implement a process to ensure compliance with all requirements of the Biodiversity and Rehabilitation Management Plan.	In accordance with Condition 5 of Schedule 5 of PA 10_0183, within three months of this audit report, Metromix will review and update the Biodiversity and Rehabilitation Management Plan to address this recommendation.

Issue No.	Condition	Requirement	Issue sighted	Recommendation	Metromix Response
		• 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; • ensuring minimal environmental consequences for the local *Tetratheca juncea* population; • protecting vegetation and fauna habitat outside the approved disturbance area on-site; • minimising the impacts on native fauna on site, including undertaking appropriate pre-clearance surveys; • controlling weeds and feral pests; • controlling erosion; • controlling access; and • bushfire management; h) include a program to monitor the effectiveness of these measures, and progress against the performance and completion criteria; i) identify the potential risks to successful implementation of the Biodiversity Offset Strategy and rehabilitation of the site, and include a description of the contingency measures that would be implemented to mitigate against these risks; and j) include details of who would be responsible for monitoring, reviewing, and implementing the plan. The Proponent must implement the plan as approved by the Secretary.			
NC-08	Schedule 5 Condition 2	**Adaptive Management** The Proponent must assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this approval and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria and/or performance measures has occurred, the Proponent must as soon as becoming aware of any exceedance: (a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not reoccur; (b) consider all reasonable and feasible options for remediation (where relevant); (c) within 14 days of the exceedance occurring, submit a report to the Secretary describing these remediation options and any preferred remediation measures or other course of action; and (d) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.	9 instances were recorded where non-compliances with criteria or performance measures were recorded. Of the 9 instances, 6 were recorded as noncompliance's with criteria, while 3 were recorded as incidents.	Metromix should review and, if necessary, amend existing controls which have been implemented to minimise the risk of exceedances of project criteria or performance measures	In accordance with Condition 5 of Schedule 5 of PA 10_0183, within three months of this audit report, Metromix will review and, if necessary, update the relevant management plans/strategies to address this recommendation.
NC-09	Schedule 5 Condition 7A	The Proponent must immediately notify the Secretary (using the contact name, email address and phone number provided by the Department from time to time) and any other relevant agencies of any incident.	Incidents had not always been immediately notified to the Secretary	Metromix need to ensure that incidents are reported to DPHI as soon as becoming aware of the incident.	This non-compliance is noted and Metromix will endeavour to notify incidents immediately upon becoming aware of the incident in accordance with this condition. It is noted that all three notifiable incidents within the audit reporting period were notified to DPHI within zero to five days of becoming aware of the incident (see JHC Ref No. 98 in Appendix C of the IEA Report).

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<tr><th>Issue No.</th><th>Condition</th><th>Requirement</th><th>Issue sighted</th><th>Recommendation</th><th>Metromix Response</th></tr>
<tr><td>NC-10</td><td>Schedule 5
Condition 7B</td><td>Within 7 days of the date of the incident, the Proponent must provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested. This report must include the time and date of the incident, details of the incident, measures implemented to prevent re-occurrence and must identify any non-compliance with this approval.</td><td>Incidents reports had not always been provided to the Secretary within 7 days of the incident.</td><td>Metromix need to ensure that incidents are reported to DPHI as soon as becoming aware of the incident.</td><td>This non-compliance is noted and Metromix will endeavour to report incidents within seven days of becoming aware of the incident in accordance with this condition.
It is noted that incident reports were prepared and provided to DPHI for all three notifiable incidents within the audit reporting period. Only one of these reports was provided outside the timeframe (eight days) required by this condition.
(see JHC Ref No. 99 in Appendix C of the IEA Report).</td></tr>
<tr><td>NC-11</td><td>Schedule 5
Condition 11</td><td>Within 3 months of the date of this approval, the Proponent must:
a) make the following information publicly available on its website:
• the EA;
• current statutory approvals for the project;
• approved strategies, plans or programs;
• a summary of the monitoring results of the project, which have been reported in accordance with the various plans and programs approved under the conditions of this approval;
• a complaints register, updated on a quarterly basis;
• minutes of CCC meetings;
• copies of any annual reviews (over the last 5 years);
• any independent environmental audit, and the Proponent's response to the recommendations in any audit; and
• any other matter required by the Secretary; and
keep this information up-to-date, to the satisfaction of the Secretary.</td><td>The following information was not available:
• Proponent's response to the recommendations in the previous audit
• 2023-2024 Annual Review</td><td>Metromix should ensure that all required information by the project approval is provided on the website.</td><td>Metromix considers this issue is resolved as the response to the recommendations of the previous audit has been uploaded to the website.</td></tr>
<tr><td>NC-12</td><td>EPL
L3.1</td><td>For each discharge point or utilisation area specified below (by a point number), the volume/mass of:
a) liquids discharged to water; or;
b) solids or liquids applied to the area;
must not exceed the volume/mass limit specified for that discharge point or area.
<table>
<tr><th>Point</th><th>Units of Measure</th><th>100 percentile concentration limit</th></tr>
<tr><td>4</td><td>kilolitres per day</td><td></td></tr>
<tr><td>5</td><td>kilolitres per day</td><td>2000</td></tr>
<tr><td>5</td><td>megalitres per year</td><td>113</td></tr>
</table></td><td>Daily readings not available to demonstrate compliance with daily discharge limits for EPL Point 5.</td><td>Metromix should implement a process to record daily discharges from EPL Point 5.</td><td>Metromix will take recordings of flowmeter data at EPL Point 5 daily during discharge to ensure demonstrable compliance with this condition. No further action required.</td></tr>
<tr><td>NC-13</td><td>EPL
M2.2</td><td>Air Monitoring Requirements
POINT 1,8,9,11,13
<table>
<tr><th>Pollutant</th><th>Unit of Measure</th><th>Frequency</th><th>Sampling Method</th></tr>
<tr><td>Particulates - Deposited Matter</td><td>grams per square metre per month</td><td>Once a month (min. of 4 weeks)</td><td>AM-19</td></tr>
</table>
Point 3
<table>
<tr><th>Pollutant</th><th>Unit of Measure</th><th>Frequency</th><th>Sampling Method</th></tr>
<tr><td>PM_{10}</td><td>micrograms per cubic metre</td><td>Every 6 days</td><td>AM-18</td></tr>
</table></td><td>An exceedance of PM_{10} sample frequency requirement (6 days) was recorded on 8 September 2024.
The exposure period for the deposited dust samples collected on Monday 3 November 2025, were outside the required period of 30 ± 2 days.</td><td>Metromix should ensure that staff are appropriately trained and that monitoring is undertaken in accordance with the approved AQMP.</td><td>Metromix considers this issue is resolved as air quality monitoring requirements have been clarified with relevant staff to ensure compliance with the approved AQMP.
It is noted that, as no incidents or complaints in relation to air quality were recorded at the Quarry during October 2025, it is considered that this non-compliance has not caused any material harm to the environment and is therefore not considered to be an 'incident' in accordance with the definitions of PA 10_0183. A non-compliance report was provided to DPHI and EPA on 28 November 2025.</td></tr>
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<tr><td>NC-14</td><td>EPL
M2.3</td><td>Water and/ or Land Monitoring Requirements
Point 4<table><tr><th>Pollutant</th><th>Unit of Measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Electrical conductivity</td><td>microsiemens per centimetre</td><td>Monthly</td><td>Grab sample</td></tr><tr><td>Oil and Grease</td><td>milligrams per litre</td><td>Monthly</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Monthly</td><td>Grab sample</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Monthly</td><td>Grab sample</td></tr></table></td><td>No water sample was collected in February at EPL No.4 (Adit Dam) due to an administrative oversight. Monitoring was collected on 8 March 2024.</td><td>Metromix should ensure that, where a change in personnel occurs, a thorough handover is conducted to ensure the new worker understands all requirements of the role.</td><td>A toolbox talk was developed and communicated to relevant personnel in regard to this non-compliance. Metromix will continue to undertake thorough staff training to ensure employees are aware of monitoring and compliance requirements.
New staff are to review and sign management plans as part of onboarding to ensure role clarity.</td></tr>
<tr><th>Reference</th><th colspan="2">Identified Opportunity for Improvement</th><th colspan="2">Metromix Response</th></tr>
<tr><td>1</td><td colspan="2">Metromix may consider updating the project website to improve the layout and provide easier access to documentation.</td><td colspan="2">Metromix has initiated a review of the website in conjunction with its IT managers and internal staff to identify opportunities for improvement of the layout and ease of access. Progress with this review will be reported in the following Annual Review.</td></tr>
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