

DEPARTMENT OF PLANNING

FINAL SUBMISSION

1. RESPONSE TO SUPPLEMENTARY REPORT ON
CUMULATIVE AIR QUALITY IMPACTS (DR. HOLMES 12/7/91)

Dr. Holmes estimation of Worst Case Impacts of Dust

Worst case Impacts were selected from the situation of Year 3 Glennies Creek, Year 5 Camberwell, Year 2 Glendell (as extrapolated). Table 1 (Inventory of Dust Emissions) showed total emissions of 9644.9 t/yr for Glendell Colliery (not yet in production) as compared with 604.2 t/yr for Glennies Creek Coal Project and 2647.3 t/yr for Camberwell Colliery.

The production of dust at Glendell Colliery (not yet in production) was estimated by Dr. Holmes as 2.68 kg/t of ROM coal, 0.24 kg/t ROM Coal at Glennies Creek Coal project and 1.32 kg/t of ROM Coal at Camberwell Colliery.

Air quality at Residences 1 and 2 (R1 and R2) was predicted as 7 gm/m²/mo and 4.5 gm/m²/mo in the worst case of the three mines operating with the contribution by Glennies Creek being 1 gm/m²/mo and 0.5 gm/m²/mo respectively. Estimated dust concentration would be in the worst case 150/ug/m³ or 90ug/m³ (at criterion).

Discussion

The assumed dust generation activities (proposed) at Glendell need to be further checked as an update of prediction.

Recent advice from Glendell Coal Limited (17 July 1991) is that the dust emission of 2.68 kg/t of ROM coal from Glendell used by Dr Holmes is not valid as the Glendell Colliery would operate with modern mining equipment and techniques and air quality safeguards set by the SPCC similar to comparable mines such as Camberwell, Howick (both 1.32 kg/t) Rixs Creek (0.58-0.84 kg/t), Bulga (0.85- 1.04 kg/t), Narama (0.7 - 1.06 kg/t). The advice from Mr M.J. Shea of Glendell Coal Limited assisted in the timing of predicted dust emissions from Glendell Colliery:

"In considering a 'worst case' impact, it is worth noting that Glendell coal production could not start within 1½ to 2 years, because of the time necessary to finish building the project, and would not reach the full production rate of 3.6 mtpy of ROM coal for at least 4 years after commencement of production. Under conditions of a slow buildup of demand for export coal it could take as much as 8 years to reach full production."

Conclusion of Mr Shea

"Generally it can be said that although the basis for Dr. Holmes' modelling is not known in detail, for the reasons outlined above the predictions of dust deposition and concentration of total suspended particulates in the ambient air are likely to have been overstated as far as the Glendell contribution is concerned."

2. MATTERS RAISED IN THE APPLICANT'S SUBMISSION IN REPLY

Issue of the Glendell Colliery and Cumulative Impact

The Department in general considers that monitoring of cumulative impact can only proceed when mining at the various sites is underway but assessment can be made on the basis of predictive studies. There has been no mining at Glendell Colliery since development consent or the granting of a coal lease. Glendell does not exist as a coal mine so its practical impact is nil. Should Glendell Colliery commence mining in the near future its environmental impacts would be monitored in the cumulative impact requirements applying to the various mines.

Specific development consents are discrete decisions and are not necessarily altered when future developments occurs. It is prudent for the decision-maker to cover the likely future by applying conditions which are flexible enough to provide for changing environmental circumstances.

Dust cumulative impact has been addressed by the Applicant's submissions and should continue to be considered as a predicted cumulative impact. If new information comes to hand from the Glendell and Camberwell Collieries this would need to be considered.

It is still the Department's view that cumulative environmental loadings of particulates, gaseous emissions, contaminated or saline water discharge actually emitted or produced provide a basis for the review of further proposals which entail emissions or discharges.

Mitigation Measures

The Applicant seems to now want to rely on the Camberwell put option agreements, with contracts for sale attached, as the basis of environmental mitigation and looks only to small incremental impacts to be addressed by itself.

The methodology of environmental impact assessment (EIA) of a project where impinged on by an operational project is correctly followed in the EIS with its definition of zone of affectation. The EIS was the basis upon which the Department's assessment was built. In defining the environment in which the proposed project is located, it is relevant to include existing operational projects and assign discrete values of impact to the project being assessed, such that the total or cumulative impact can be estimated.

Background Noise Levels

The Department's background night time noise criterion selected was the L90 value intermediate between "rural" (35dBA) and "industrial" (45dBA) for a residence, as set out in the SPCC Noise Control Manual "Recommended Outdoor Background Noise Levels". The Department maintains that L90 40 d B(A) is an appropriate value until further advised by the SPCC.

Residential Impact

The Applicant has not fully addressed the issue of residential impact, on the owners of R1 and R2 and has relied on the "contractural" arrangements of these owners with respect to the existing operating project (Camberwell Coal Mine). The Department considers "safety net" provisions fair to all parties are appropriate.

These provision are addressed in the suggested conditions of consent, in relation to pollution control, amenity protection and acquisition or compensation arrangements.

Non Objectors

The Applicant has effectively stated that other potentially affected or marginally affected land-owners who are not objectors do not need to be considered in terms of requirements for mitigation should adverse circumstances arise. Section 90 of the Act includes "the public interest" so the Department appropriately looks also to impacts on parties who are not objectors to the proposal, as well the formal objectors.

3. PROPOSED CONDITIONS OF CONSENT

The attached schedule sets out the Department's suggested conditions. As indicated in the Department's covering letter advice is being sought from the SPCC as to numerical limits on pollution levels for inclusion in the conditions of consent.