



4 December 2018

Sheridan Ledger
Acting Head Central West
Environment Protection Authority
PO Box 1388
Bathurst NSW 2795

Sent by email to:
Sheridan.Ledger@epa.nsw.gov.au

Dear Sheridan,

Re: Tritton Mine – DA 41/98 Modification 6 – Response to EPA Feedback on RTS

Thank you for providing further feedback on behalf of the Environmental Protection Authority (EPA) following review of the *Response to Submissions* for Modification 6 of Development Application (DA) 41/98 for the Tritton Mine (the Mine).

It is noted that the activities associated with tailings extraction, handing and storage before transport and use in the paste fill plant at the Murrawombie Mine encompass two different development consents (DA 41/98 and DA 10/2018/027/001) and Environment Protection Licences (11254 and 4501). This makes defining management and regulation problematic. It is proposed that the majority of the EPA's request may be addressed though a single condition that requires the preparation of a Tailings Extraction Management Plan that also incorporates the activities at the Murrawombie Mine such that management across both sites is accounted for.

The question of whether this requirement is included as a special condition on the EPLs for the operations or incorporated as a condition of DA 41/98 is a matter for the Department of Planning and Environment and the EPA to determine.

As discussed on the phone on 3 December 2018, I have prepared a response to the EPA's recommended conditions of consent, taking into account the outcomes and request for further clarification during our discussion. I have separated the response into the three headings based on the most recent EPA correspondence.

Air Quality

Tritton Resources Pty Ltd (Tritton) agrees with the premise of the recommended Conditions 1, 2 and 3. It is noted that any monitoring program prepared in consultation with the EPA would address the requirements of Condition 4, making this condition redundant. It is not agreed that a TEOM be

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required for dust monitoring, however it is acknowledged that real-time dust monitoring will be a component of management. As discussed, the monitoring requested may be undertaken using an E-Sampler, DustTrak or similar monitoring equipment such that real time data can be recorded, the equipment can easily be installed and moved and may be powered using a solar panel.

I note that we discussed that meteorological monitoring (Condition 5) should be limited to monitoring of wind direction and wind speed during any period when real time dust monitoring is occurring, to further qualify the results and conclusions from monitoring.

Water

As discussed, please find attached a copy of the Erosion and Sediment Control Plan for the Tritton Mine. This was inadvertently left out of the *Response to Submissions* document and not picked up when sent to you. A specific condition relating to the preparation of an Erosion and Sediment Control Plan is therefore not required.

Waste (tailings)

I note your query about water management on the stockpiling pad for the Tailings Storage Facility (TSF). As we discussed, the information provided previously was obviously not clear. The pad used for stockpiling tailings material and for truck access will be constructed from waste rock material and will effectively be constructed to ensure that stockpiling and handling operations avoid the surface of the TSF where possible. However, as the pad would sit within the TSF, it would be incorporated into water management for the facility. That is, there would be no bunding, drains or diversions on this pad and rainfall would drain towards the decant pond for the TSF, similar to management of the remaining surface of the facility. There is therefore minimal risk that rainfall in this location would pool or present a risk to the stability of the facility embankment.

Conclusion

It is agreed that the activities would benefit from a management plan that provides an overview of both the extraction and handling as well as transport and use of the material so that the entire process is described in one place. In addition, any management plan would provide a useful guide for Mine personnel that may be undertaking the activity and present a summary of environmental management actions required during any paste fill production campaign.

It is proposed that Tritton prepare a Tailings Extraction Management Plan in consultation with the EPA that incorporates the following.

1. A figure that presents the layout of both tailings extraction activities and the paste fill plant at Murrawombie.
2. A summary of design controls for tailings extraction cells to limit risks to embankment stability.
3. An overview of the production process including the following.
 - a. Tailings extraction procedures
 - b. A description of stockpiling areas, volumes and indicative timing for drying (storage) at the Tritton Mine.
 - c. Loading and hauling procedures including risk management for activities on the TSF.
 - d. Transportation overview including load covering.
 - e. An overview of stockpiling procedures at the Murrawombie Mine including a description of the stockpiling area and indicative storage volumes.
 - f. An overview of paste fill production procedures.

4. A description of the management and mitigation measures that would be implemented during any paste fill production campaign, including any monitoring program.
5. A Trigger Action Response Plan.
6. Procedures for managing incidents, complaints or unforeseen events.
7. A summary of roles and responsibilities of key personnel in the process.
8. A procedure for evaluating the success of management.

I trust that the above satisfies the final requests of the EPA with regards the Modification 6 proposal and tailings excavation operations. Should you have any additional queries on the above, please don't hesitate to contact myself or Dean Woods.

Yours sincerely



Nick Warren
Senior Environmental Consultant

Encls: Tritton Mine – Erosion and Sediment Control Plan (RWC, 2015)

Copy: Tritton Resources Pty Ltd