



Our reference: EF13/2705:DOC16/401196-02:MF
Contact: Matt Fuller (02) 4224 4100

Department of Planning and Environment
(Attention: Gen Seed)
GPO Box 39
SYDNEY NSW 2001

Dear Ms Seed

DA 470-11-2003 – MOD 8 – PROPOSED QUARRY BUND
BORAL RESOURCES – DUNMORE QUARRY

I refer to your letter and attached Environmental Assessment (EA) to the Environment Protection Authority (EPA) of 11 August 2016 seeking comment on a proposed modification to DA 470-11-2003 for a proposed bund to be constructed west of the existing Croome Farm quarry operations at Boral Dunmore.

The EPA has identified a number of issues that require further information and clarification in regards to the environmental impacts of this development and ensure appropriate mitigation measures will be implemented to protect the environment and community amenity.

On the basis of a review of the information provided the EPA makes the following observations:

- The modification proposal involves the construction of a 1.8 kilometre bund, up to five metres high and varying in width from between 24 and 41 metres. It will involve the use of extracted overburden from the existing approved extraction area.
- The proposed bund is intended to provide pre-emptive noise and visual management for the site for a proposed extension of the Croome Farm Pit (Croome Farm West Pit). This will be the subject of a future modification application – Modification 9 (Mod 9) - expected to be lodged in mid to late 2016.
- The proposed bund (Mod 8) and proposed extraction area (under Mod 9) will move construction and quarrying activities over the existing ridgeline, downhill and closer to rural residential areas to the west. Existing quarrying activities (including blasting) currently occur about 1000 metres from these privately owned residences. The Company has stated in recent Community Consultative Committee minutes (17 February 2016) that the “*proposed pit footprints*” could potentially be as close as 300 metres, if approved.

The EPA provides the following initial comments to assist the Department of Planning and Environment (DPE) in the assessment and determination of the proposal.

1. The design and size of the bund does not appear to have been clearly justified from a noise and visual management perspective.
 - i. There appears to be no information in the EA on how the bund will provide noise management to residences to the west of the proposed future extraction area (Mod 9), if approved.
 - ii. There appears to be insufficient information in the EA to demonstrate the relationship of the bund to the topography of the land to support its visual management outcome. This includes information on the relative levels (in metres) of the land and bund. This is important in justifying the scale of bund construction, quantity of overburden to be emplaced and extent of any land disturbance. This can

influence factors such as the duration of the project, vehicle activities/equipment type associated with its construction and resulting environmental impacts, including dust and noise.

2. There are risks that the bund will not provide effective visual and noise management in the absence of Mod 9 being assessed and determined. For example, if the bund was constructed as proposed it may need to be modified following future acoustical assessments under Mod 9 and if the final approved extraction area varied from that proposed in this EA. This may result in additional environmental impacts (for example, noise, dust and vegetation disturbance) that could be avoided by a more integrated assessment and determination of the Mod 8 and 9.
3. There appears to be no mention in the EA of the linkages of the proposed Mod 8 project measures to existing environmental management strategies and environmental monitoring programs for the site (for example, as required under existing approval conditions). A Construction Environmental Management Plan should be developed and implemented (prior to construction) which clearly documents how all environmental requirements will be achieved. It should include appropriate management strategies, monitoring programs and mitigation measures to ensure that noise (including vibration), air (including dust/fine particulates) and water pollution generated from bund construction is prevented/minimised as far as practicable.
4. There appears to be insufficient information in the EA to demonstrate that revegetation (using native plants) will be successful using extracted overburden. Extracted overburden will have less organic matter than soil, and may retain less moisture. Previous revegetation in this area has been challenging to get established. Successful and timely revegetation is important from a dust management perspective as the site is elevated and exposed to frequent strong winds.
5. The modification proposes some amendments to existing consent conditions. These amendments include changes to the Blasting Hotline, Blast Management Plan, Fines Management Plan, Flocculent Management Plan and groundwater monitoring. Before determining these changes the Independent Environmental Audit required under the existing consent should be considered. This audit includes a review of the adequacy of existing plans and recommended actions to improve environmental performance. The EPA requests an opportunity to consider the audit report and its outcomes before providing further comments on these proposed amendments. The future expansion of the quarry (Mod 9) should also be taken into account when considering these changes.

The EPA may also provide further comments on the Air Quality Assessment (Appendix B) and Noise Assessment (Appendix C) of the EA in a separate letter to DPE. We also may provide additional comments upon receipt and review of any further information in relation to the proposed development modification.

The EPA is able to meet at a mutually convenient to discuss the above matters, if required.

If you have questions please phone Matt Fuller on (02) 4224 4100.

Yours sincerely



01/09/16

PETER BLOEM
Manager Illawarra
Environment Protection Authority