



State Pollution Control Commission



Manager Assessments Branch
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Attention: Mr V Thomson

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27 FEB 1990

Dear Sir

ENVIRONMENTAL IMPACT STATEMENT Camberwell Coal Project

We refer to the Environmental Impact Statement (E.I.S) for the proposed Camberwell Coal Project of Camberwell Coal joint venture and offer the following comments.

Air Pollution

The E.I.S highlights the fact that there will be unacceptable impact, ie annual average dust deposition greater than +2 grammes per square metre per month increment and/or suspended particulates greater than 90 $\mu\text{g}/\text{metres cubed}$ at a number of residences. The residences affected will vary throughout the 20 year life of the mine. The Commission therefore recommends that the proponent must substantiate that suitable arrangements have been made to reduce the impact on these people. The proponent could provide a buffer zone and negate any possible future demand to construct residences/developments within the +2g/metres squared/month and 90 $\mu\text{g}/\text{metres cubed}$ contours (Drawings No 7.4.5 to 7.4.10). The residences that will be affected are 3, 37, 38, 65, 68, 91, 92, 96 to 103 and 131 and vary during the life of the mine. Singleton Heights, Bridgman Road and Camberwell Village we believe may experience elevated dust deposition and suspended particulate levels but these will fall below our ambient long term goals.

Noise Pollution

The E.I.S again highlights that there will be impacts on residences. The Commission has set a maximum goal of LA10T 35dB(A) night time and 45dB(A) daytime noise levels for the residences. These levels are those specified in our Environmental Noise Control Manual. Residences 3, 36, 37, 38, 64, 65, 68, 91, 92, 95 to 103 and 131 will be above our goals.

Increased traffic flows will occur on Bridgman Road and Middle Fallbrook Road during the construction/operation of the mine but the noise levels at the residences has not been assessed in the E.I.S and so no comparison with our Noise goals as set down in our Environmental Noise Control Manual have been done. We suggest these levels be provided prior to Development Consent being issued.

The Commission has set blasting overpressure and vibration criteria of; overpressure 115 dBlin and ground vibration 5mm/second peak particle velocity (2mm/second for historic buildings) at the receptor. These criteria will be exceeded at residences for some period during the 20 year life of the mine.

The levels of overpressure and ground vibration will also exceed our 2mm/second goal at 'Dulwich' homestead. If the proponent purchases as proposed the area inside the zone of affectation (7.4.13) the affects of blasting on residences will be negated.

Approval of any new residential or accommodation developments within the 35 dB(A) contour without taking into account noise levels should not occur. Noise impact at Singleton heights, Bridgman Road and Camberwell Village we believe will be below our goals.

Water Pollution

We will require a goal of nil contaminated dry weather discharges off-site ie the most contaminated waters to be reused on-site first. If however, due to the unforeseen weather conditions or increased mine water make, the company requests to be allowed to discharge contaminated water, the Commission would only allow this to occur when the assimilative capacity of the Hunter River and Glennies Creek could accept it and when end uses of Glennies Creek, Station Creek and the Hunter River were not impaired. Table 5.6.2 indicates that there is generally a water deficit even after taking ground water inflows into account. The Commission believes that water pollution should not be viewed as a reason to defer Development Approval.

General

The Commission believes that this proposal should only be given Development Consent when evidence has been provided to substantiate that suitable arrangements have been made to reduce the impact of both noise and dust on the areas listed above. Nuisance dust may occasionally occur at other areas.

The proposal will require approval under Section 17 of the State Pollution Control Commission Act and this also would only be granted if suitable arrangements had been made with the affected property owners.

The Commission is generally in agreement with the proposal in the E.I.S in that if the properties are purchased within the zone of affectation figure 7.4.13 impact of both noise and dust on the areas outside that zone of affectation will be below our criteria.

A copy of this letter has been forwarded to Singleton Shire Council and Camberwell Joint Venture.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'R. Smith', is written above the typed name.

R Smith
Deputy Regional Manager
Hunter & North Coast
for Secretary