

Gabrielle Allan

From: sysadmin@interlated.com.au on behalf of Gardens of Stone <sysadmin@interlated.com.au>
Sent: Monday, 9 October 2023 7:15 PM
To: Gabrielle Allan
Cc: jrobens@interlated.com.au; keith.muir6@bigpond.com
Subject: Angus Place mod 8 and West Coal Services mod 5 submission

I have not made a reportable political donation:
No

I would like my name withheld: No

Felicity Crombach
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I am objecting to the proposal:
Yes

To Whom It May Concern

I am objecting to several points. I have visited the Gardens of Stone many times when I lived in NSW and it remains a favourite place in my memories.

Firstly, the lack of time for comment on these damaging proposals especially over a long weekend when I was busy with my grandchildren.

Secondly, the modification proposals should be part of the Angus Place West major project, not treated like a separate project

Thirdly, nationally endangered wetlands and swamps are so easily damaged but this could happen to much greater degrees by mining. Especially so because mining companies are notorious for not cleaning up after themselves.

Fourthly, and this is surely the thing that will knock this project on the head, Sydney's drinking water supplies are likely to be contaminated. The water the mining company proposes to dump can't be treated at the specially built 40ML/day mine water treatment plant. If not there then where? I may not live in Sydney these days but I still visit and I have friends and relatives who live there.

Fifthly, the modification proposals should be subjected to scrutiny under Federal environmental law. With Centennial's track record it is not safe to rely on its environmental report.

Another reverse osmosis treatment plant is needed right now to treat this additional mine water. It would be a disaster if water escaped into the waterways due to insufficient treatment plants.

We need more time to comment. Some time was taken up with public holidays.

Modification 8 for Angus Place and modification 5 for Western Coal Services appear to be part of Centennial's plans to expand mining under Angus Place West – which has to go through a state significant development application. The impacts of these modifications should be assessed in totality with Angus Place West major project, rather than piecemeal through these modifications.

The modifications should be withdrawn and the proposed changes should be included in Centennial's state significant development application for the Angus Place West mining area so that they can be appropriately assessed.

In 2018, Angus Place Mine Modification 5 was approved allowing pumping at a rate of 10 ML/day from mine workings (areas 800 and 900). Following this approval, the groundwater table dropped between 21 and 30 metres (Centennial Coal, Coxs River Swamp Review, July 2018, pg44). This drop in groundwater was observed to quickly dry out Kangaroo and Lambs Creeks and associated swamps, as well as the Coxs River and swamps (Lithgow Environment Group, pers. comm. 4 Oct, 2023). Since 2018, far-field loss of surface waters in Newnes Plateau streams and swamps have been observed over a kilometre away following depressurisation of groundwater in a coal

seam due to coal mining at Springvale. Such far-field impacts may explain the observations made by Lithgow Environment Centre in 2018 and why future surface water losses from dewatering areas 800 and 900 may be expected.

Due to the proximity of the Lithgow Coal seam to the surface in the Angus Place West project area. These modifications may cause regional drawdown or localised far-field drawdown of near-surface groundwater, damaging Kangaroo and Lambs Creeks and swamps, as well as the upper Coxs River and its swamps. Nationally endangered plants may also be harmed, including *Xerochrysum palustre* (Swamp everlasting), *Pultenaea glabra*, *Kunzea cambagei*, *Veronica blakleyi*, *Grevillea acanthifolia*, *Gentianella cunninghamii*, *Prasophyllum australe* and Latham's Snipe (a rare migratory bird species).

The mine effluent will have elevated levels of heavy metals if salinity is treated to the proposed 350µS/cm standard. This level of treatment may not adequately protect aquatic ecosystems, especially macroinvertebrates, given the flow of mine water at the LDP001 entry point into Wangcol Creek. Wangcol Creek flows to the Coxs River and is part of Sydney's Drinking Water Catchment. The modifications will see more contaminated mine water going into the Wangcol Creek from the Western Coal Services site. This water is likely to be contaminated with toxic chemicals such as arsenic and selenium that have been recorded as present in the mine water of the Springvale-Angus Place mine water system.

The proposed discharges should not meet the "neutral or beneficial" test for water pollution because it adds to the overall pollution load in the creek. The transfer of 10ML/day of mine water from Angus Place to the Western Coal Services site for discharge should not be allowed.

Adding mine water to a highly polluted element of the Wangcol Creek catchment is also likely to flush out more heavy metals from that contaminated part of the catchment downstream into the Coxs River, a key part of Sydney's water catchment that flows through the Greater Blue Mountains World Heritage Area.

These modification proposals to allow large discharges of mine water also defeat the purpose of the \$120 million Springvale Water Treatment Project (SSD-7592, approved in June 2017) that was built to eliminate mine water discharges from Springvale Mine and Angus Place Colliery.

We are concerned the modifications have not been referred for Commonwealth assessment under the EPBC Act. We think that this project is likely to have significant impacts on water and that the modifications should be referred to Environment Minister Plibersek to determine if the water trigger applies. Commonwealth assessment and the application of the water trigger is important to ensure that there is rigorous assessment of the surface and groundwater impacts of the modifications.

In 2011, Centennial acknowledged that the Federal Environment Minister considered its mining activities had had a significant impact on Temperate Highland Peat Swamps on Sandstone, namely Narrow Swamp, East Wolgan Swamp and Junction Swamp and entered a \$1.45 million enforceable undertaking with the Commonwealth under s 486DA of the EPBC Act. These swamps have not recovered and are expected to be permanently lost. The company has since paid \$28 million that only partly offsets some of the significant damage it has caused to nationally endangered swamps on Newnes Plateau.

Centennial Coal should withdraw modification 8 Angus Place and 5 Western Coal Services. Centennial Coal should at least seek to install a reverse osmosis treatment plant at Angus Place, as it did under modification 5, and then pump the brine effluent to Springvale Water Treatment Plant site for processing and appropriate disposal.

Any proposal for additional water treatment capacity at Angus Place Mine should be made as part of the major project for Angus Place West. Discharges from a reverse osmosis treatment plant at Angus Place should have a salinity of 30µS/cm to have a neutral effect on the salinity of the Coxs River headwaters that would receive this discharge.

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