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22 April 2026

Emily Murray
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Locked Bag 5022
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via: NSW Major Projects Portal

EPA Advice on SSD Modification Application – Rasp Mine Modification 13 – PA 07_0018

Dear Ms Murray

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to comment on Public Authority Consultation (PAE)-112725988 – Modification Application (PA 07_0018-Mod 13) for the proposed extension of mining operations and receipt and processing of ore from Pinnacles Mine at Eyre Street, Broken Hill.

The EPA has reviewed the following documents:

- *Rasp Mine Modification 13 – EMM – March 2026*
- *Rasp Mine Modification 13 – Noise Impact Assessment – EMM – 9 February 2026*
- *Blast Vibration Assessment Proposed Mod 13 Production Blasting – Fromble Corp Pty Ltd – 30 September 2025*
- *Rasp Mine Mod13 water resources assessment of related risks and impacts – EMM – 9 February 2026*
- *Rasp Mine Modification 13 – Air Quality Assessment – Zephyr Environmental – 24 February 2026*
- *Rasp Mine Modification 13 – Greenhouse gas assessment – EMM – February 2026*
- *Human health risk assessment – potential impact of Mod 13 on Mod 6 HHRA conclusions – SLR Consulting Australia Pty Ltd – 24 February 2026.*

The EPA understand the proposal is for:

- Extending the underground mining operations into the British deposit (Mining Lode Block 16);
- Develop a tailings dewatering system;
- Installation of an additional emergency egress ladderway from the underground workings to the surface;

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

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- Receive and process up to 100,000 tonnes per annum of ore from the Pinnacles Mine;
- Increase the total amount of ore permitted to be extracted from 8,450,000 tonnes to 12,200,000 tonnes over the life of the project; and
- Extend the approved mine life from 31 December 2026 to 31 December 2031.

The EPA note that Pinnacles Mine is owned by Pinnacles Mines Pty Ltd and operated by Broken Hill Mines and is approved under DA13/13732 under Part 4 of the *Environmental Planning and Assessment Act 1997*. The EPA understand that Pinnacles Mines are running a process parallel to this modification to modify DA13/13732 to allow for the haulage of up to 100,000 tonnes per annum of crushed ore from the Pinnacles Mine to the Rasp Mine. The EPA advise that acceptance and processing of ore from the Pinnacles Mine cannot commence until approval to modify the DA has been obtained from Broken Hill City Council. The EPA will need to be consulted during this DA modification process.

The EPA has responsibilities for pollution control and environmental management under the *Protection of the Environment Operations Act 1997* (the Act). Broken Hill Operations Pty Ltd (the licensee) hold Environment Protection Licence No. 12559 (the licence), issued pursuant to the Act for scheduled activities being undertaken at the premises.

Please note, all activities associated with the proposed modification will be subject to regulation by the EPA in accordance with the licence, including those which may result in potential offsite impacts during both the construction and operational phases of the proposal.

Based on the information provided, the EPA does not object to the proposed modification. However, following review of the information provided considers that additional information is required to complete our assessment. This additional information is detailed in **Attachment A**.

Attachment B provides details of the EPA's recommendations for matters to be addressed with conditions.

The EPA notes that the estimated emissions provided in the GHG assessment (prepared by EMM and dated 09 February 2026) show that the proposal is estimated to generate less than 25,000 tonnes per annum of scope 1 and scope 2 emissions. Therefore, the proposal does not trigger the assessment requirements in the NSW EPA Guide for Large Emitters (Large Emitters Guide).

For future applications or modifications that may lead to increased GHG emissions, applicants are required to provide the following information to enable the consent authority and the EPA, to determine if the proposal is or is not considered a large emitter:

- An estimate of Scope 1 and Scope 2 GHG emissions associated with the proposed modification
- Confirmation of whether the modification is likely to result in 25,000 tonnes CO₂-e or more of Scope 1 and 2 emissions in any financial year

If the estimated emissions exceed this threshold in any financial year during the project's operational life, then the Applicant will be required to provide a GHG assessment prepared in accordance with the Large Emitters Guide.

To reduce the risk of delays in the assessment stages of future applications or modifications, the Applicant should ensure consistency with the principles in the NSW EPA Guide for Large Emitters. If the Applicant considers that certain requirements of the guide are not applicable, this can be specified. However, supporting evidence and justification must be provided.

If you have any questions about this request, please contact EPA Operations Western Districts via email at info@epa.nsw.gov.au or via phone at 131 555.

Yours sincerely

A handwritten signature in cursive script that reads "Briohny Seaman".

Briohny Seaman
Unit Head
NSW Environment Protection Authority

ATTACHMENT A: Matters to be addressed prior to determination

Tailings Dewatering System

The EPA recommends that further information is provided on the proposed tailings dewatering system.

The modification report outlines that *'the proposal filtration plant would be located, in an enclosed building which will also contain a compressor, air dryer and instrument air'*. The EPA requires further information to adequately assess any air emission from the tailings dewatering system.

The EPA request that the proposed tailings dewatering system be assessed within the Air Quality Assessment for the modification.

Further, the EPA note the proposal to utilise the water generated from the proposed tailings dewatering system onsite. The modification report does not provide any information on the quality of the water which will be generated. The EPA has concerns that this water may be high in lead and other contaminants, rendering it unsuitable for re-use activities such as onsite dust suppression.

The EPA request further information be provided on the quality of the water generated from the tailings dewatering process.

Water Management – Site Water Balance

The EPA recommends that further information is provided on the site water balance, including how the proposed tailings dewatering system will alter water volumes, storage capacity, and reuse pathways across the site under both typical and wet weather conditions.

The water resources assessment of related risks and impacts report outlines that *'additional water disposal could occur through on-site dust suppression if the site water inventory issues become problematic'*. The EPA are concerned that there may be periods of time where the site cannot adequately maintain and control water generated from the tailings dewatering system, in particular during times of rain, or following wet periods where onsite dust suppression is not feasible.

The EPA also requires further information on the management and mitigation measures proposed to address periods where water volumes exceed site capacity, including the development and implementation of a Trigger Action Response Plan (TARP) with clearly defined triggers and response actions.

Control of lead and other contaminates between Eyre Street entrance and vehicle wash facility

The EPA note that the proposal to receive and process ore from the Pinnacle Mine would result in up to 1512 additional truck deliveries to the site per year. The EPA are aware that the transport from the Pinnacles Mine to the Rasp Mine will be assessed within a separate DA modification.

The modification report does not clearly identify the pathways that will be taken once these vehicles enter the Rasp Mine site. It is also unclear what mitigation measures will be put in place to ensure that lead and other contaminates are not transported from the site as trucks are leaving. Previous site inspections undertaken by the EPA have identified that Rasp Mine have a truck wash facility that trucks must use on exit, however following washings the trucks move onto an unsealed surface prior to exiting the facility. The modification report does not address this potential pathway for the migration of contaminants.

The EPA request further information on the actions that will be implemented to prevent the migration of lead and other contaminants from unsealed surfaces onto Eyre Street, once trucks leave the truck wash.

Noise

Out of hours construction

The ladder way raise shaft boring and installation as well as the tailings dewatering system are proposed for out of hours construction. The EPA notes that the Noise Impact Assessment does not provide justification for this.

The Interim Construction Noise Guideline (ICNG) requires that any proposal or request for out of hours construction be justified. The justification for out of hours construction should be supplied by the applicant before these hours are further considered.

The construction noise assessment has also identified minor noise exceedances of out of hour construction noise management levels for raised boring activities for the night time period, filter plant establishment works, filter plant footings and foundation works, filter plant structural erection works and tailings pipelines construction works.

The predicted construction noise levels include the construction scenario being considered combined with operational noise. Where these combined levels are below the noise management level, the levels are shown as <"NML VALUE" rather than presenting an actual predicted noise level.

The applicant should supply the magnitude (dB level) of all excursions above existing **operational noise limits** when construction activities are combined with operational noise levels. This is of most relevance for the daytime period where the construction noise management level is different to operational noise limits. These predictions should include the proposed mitigation measures outlined in the NIA in Section 6.

Noise Modelling

The Noise Impact Assessment indicates that noise modelling "was completed using DGMR 'iNoise' noise prediction software. This software applies the EPA accepted ISO 9613 approach (including noise-enhancing meteorological effects) and calculates total noise levels at assessment locations from the concurrent operation of multiple noise sources".

The iNoise model allows a user to import another noise models meteorological effects known as CONCAWE. This can have the effect of 'double counting' meteorological effects potentially resulting in over-predicting noise levels. It is recommended the following be provided:

- Details on whether CONCAWE meteorological has been applied;
- What CONCAWE meteorological category was selected; and,
- Information from DGMR (iNoise owner) that the incorporation of CONCAWE meteorology corrections to the ISO9613 model has been tested, calibrated and/or verified against any standard.

Operational noise assessment

The EPA notes that details of operational noise modelling are outlined in the NIA at Section 4.2.2 and that there is limited information about existing operational noise sources, how they were modelled (location, sound power level etc) and any validation / calibration exercises to show that the model is performing well against measured noise levels.

The model validation is particularly relevant when dealing with an existing operation as this gives a tangible opportunity to gauge the accuracy of the model. It is recommended further detail is provided on the modelling of existing operations including model validation.

The NIA indicates that existing operational noise limits will be exceeded by up to 1dBA at receivers A2 and A3 and that this is principally caused by heavy vehicle movement on the site associated with Pinnacles Mine ore deliveries. Operational noise predictions consider a reasonably worst case fifteen (15) minute period. It is recommended further information is required to indicate and justify how many heavy vehicle movements have been considered in the worst case 15-minute period and what mitigation measures are available to mitigate the noted operational noise limit exceedances.

It is also noted that the Noise Impact Assessment has not included a quantitative assessment of the Noise Policy for Industry Fact Sheet C corrections that may apply to the existing and proposed operation. It is recommended this assessment be provided. An example approach to assess low frequency noise is outlined in the EPA publication: *'An example approach to consider low frequency noise in the context of the NSW noise policy for industry'* - Acoustics Australia Vol. 48, No. 2, August 2020, pages 170-172 <https://link.springer.com/content/pdf/10.1007/s40857-020-00199-x.pdf>

ATTACHMENT B: Matters to be addressed with conditions

Transportation of ore from Pinnacles Mine

The EPA notes that the Air Quality Impact Assessment modelled the existing scenario and the proposed worst-case scenario. It is also noted that haulage of ore from Pinnacles was only considered for onsite at the RASP mine and that the haulage between Pinnacles and RASP Mine will be considered as part of the Pinnacles consent modification.

The following conditions are recommended to be included in the conditions of consent, if approved:

Condition:

Transportation of ore from Pinnacles Mine to Broken Hill Operations Pty Ltd RASP Mine must only occur in sealed trucks.

Condition:

Transportation of ore from Pinnacles Mine to Broken Hill Operations Pty Ltd RASP Mine must only occur on sealed roads.

Condition:

The applicant must not receive more than 100,000 tonne per annum of crushed ore from Pinnacles Mine.

Condition:

The applicant must not process more than 500,000 tonnes per annum of ore.