



OUT21/12847

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Planning and Assessment Group
NSW Department of Planning, Industry and Environment

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Dear Ms Cole

**Mount Pleasant Optimisation Project (SSD-10418)
Supplementary RTS**

I refer to your email of 13 September 2021 to the Department of Planning, Industry and Environment (DPIE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

This proposal is to extend the life of the open cut operation by mining deeper coal seams, using existing and proposed new infrastructure.

DPIE Water continues to have concerns regarding the proposed management of Potential Acid Forming (PAF) material with the potential to be disposed of in out-of-pit emplacement areas, specifically relating to the identification of such material, and monitoring and mitigation of potential impacts to groundwater.

Any further referrals to DPIE Water and NRAR can be sent by email to landuse.enquiries@dpie.nsw.gov.au or to the following coordinating officer within DPIE Water:

Alistair Drew, Project Officer- email: alistair.drew@dpie.nsw.gov.au

Yours sincerely

Liz Rogers
Manager, Assessments, Knowledge Division
Department of Planning, Industry and Environment: Water
29 September 2021

Attachment A

Detailed advice to DPIE Planning & Assessment regarding the Mount Pleasant Optimisation Project (SSD-10418) Supplementary RTS

1.0 Potential Acid Forming (PAF) material

1.1 Explanation

PAF Material Management

DPIE Water reiterates that PAF waste-rock material, which would be mined under the approval being sought, could potentially be disposed of in out-of-pit emplacement areas and has the potential to cause adverse impacts groundwater, including from material leachate.

The proponent has provided very limited detail regarding the process of identification of non-coal fine PAF material, noting in the Appendix C of the Supplementary RtS that *‘PAF material can be identified in-pit, separately handled and emplaced with the general run-of-mine NAF material as long as sufficient NAF cover is maintained.’*. Figure 1 of appendix C simply indicates that confirmation of acid forming potential of material will occur *‘biennially’*.

The proponent indicated in the Supplementary RtS, without providing additional detail, that *‘further associated QA/QC procedures to effectively manage PAF material at the Mount Pleasant Operation, based on operational experience’* are being developed and also that *‘further detail regarding the management of PAF materials would be documented in Mining Operations Plans/Rehabilitation Management Plans’*.

The level of detail provided by the proponent regarding the procedures for PAF material identification and management is not sufficient to give DPIE Water confidence that the potential impacts to groundwater will be managed appropriately.

Residual DPIE Water concerns include, for example: how PAF material will be identified; whether some or all of certain stratigraphy – such as the Archerfield Sandstone - will be treated as PAF; testing for PAF material will only occur once every two years (as indicated in Figure 1 of the supplementary response to submissions), and whether testing is proposed to be re-evaluated at a defined frequency or set at the Mine Operations Plan stage.

DPIE Water acknowledges that the proponent has committed to in-pit disposal of all coal fine rejects - regardless of acid forming potential.

Monitoring of Potential Impacts

DPIE Water notes that the proponent has indicated in the Supplementary Response to Submissions that elements (which weren’t specified) of the approved Mining Operations Plan and Water Management Plan are used to mitigate and monitor for potential impacts of the currently approved operations (which include out-of-pit emplacement of PAF material). However, insufficient detail has been provided to DPIE Water regarding the proponent’s commitments to monitor or respond to potential impacts related to emplacement of the PAF material which would be mined under the approval being sought.

1.2 Recommendations – Prior to Determination

That the proponent:

- provide additional details regarding the procedures (e.g. process for identifying PAF material, testing methodologies, frequency, QA/QC) which would ensure the identification and appropriate handling of all PAF material mined under the approval being sought.

- provide additional details of monitoring and proposed responses to potential impacts to groundwater from handling and disposal of any PAF material in the out-of-pit emplacement area.

End Attachment A