



DOC21/806692-7

Planning and Assessment Division
Department of Planning, Industry and Environment
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Email: Tegan.Cole@planning.nsw.gov.au

Attention: Ms Tegan Cole

15 October 2021

**EPA Advice on Submissions Report
Mount Pleasant Optimisation Project – SSD 10418**

Dear Ms Cole

Thank you for the request for advice from Public Authority Consultation (PAE-28043707), requesting the review by the NSW Environment Protection Authority (EPA) of the Submissions Report and additional matters provided by the proponent in relation to the Mount Pleasant Optimisation Project (SSD 10418).

The EPA has previously provided advice on the Environmental Impact Statement on 17 March 2021, and the Response to Submissions Report, on 26 July 2021. The EPA's previous responses included recommended conditions in relation to water quality and noise matters, but raised the following air quality assessment matters to be addressed:

- modelled mitigation measures not described; and
- identifying receptors subject to acquisition rights.

Air Quality Matters

The EPA has reviewed the submission information and notes it has addressed the EPA's submission on this project from 26 July 2021 in relation air quality matters. A detailed assessment of the proponent's submission on the air quality matters is provided at **Attachment A**.

In response to the particulate emission mitigation measures detailed by the proponent, the EPA recommends the following condition of approval in relation to air quality:

1. Evaluation of effectiveness of reactive management practices

Upon the completion of the first year of increased run-of-mine (ROM) production under the Mount Pleasant Optimisation Project (SSD-10418) and every year thereafter, the licensee must undertake a review of the reactive management measures implemented at the premises during the previous year of operations.

A report must be prepared, and provided to the NSW EPA, detailing the review undertaken for the previous year of operations. The report must include but it is not necessarily limited to:

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- a) A summary of the:
 - I. ROM coal produced in the previous year of operations
 - II. The ambient air monitoring data collected in the previous year of operations
 - III. The trigger levels (PM₁₀ concentration and meteorology) and associated actions, initiated in the previous year of operations
- b) Quantifies the number of hours the reactive management methods were used, specifying whether from environment protection licence conditions, air quality management plan or other reasons,
- c) Evaluates the effectiveness of the reactive management measures in minimising dust (PM₁₀, PM_{2.5}) impacts at receptors,
- d) Recommends any necessary changes to monitor locations, trigger levels or actions required to mitigate dust impacts.

Noise Condition Matters

In response to the EPA's recommended noise limit conditions in our letter of 26 July 2021, the proponent raised some concerns with the conditions. These were discussed at a meeting between the EPA and the proponent on 22 September 2021. The process of determining the recommended noise limits and associated criteria was discussed, and at the conclusion of the meeting the EPA invited the applicant to provide further written submission if they wished.

To date the EPA has not received any further submission from the proponent in regard to the recommended noise conditions previously provided, and as such the EPA does not propose to vary the noise conditions and limits already provided. There is no change to the recommended noise conditions provided at Attachment C of our letter dated 26 July 2021.

If you have any questions about this request, please contact Michael Howat on 02 4908 6819 or via email at RegOps.MetroRegulation@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'KG' with a stylized flourish.

KAREN GALLAGHER
Acting Unit Head, Regulatory Operations Metro North
Environment Protection Authority

Attachment A – Air Quality Impact Assessment

Modelled mitigation measures

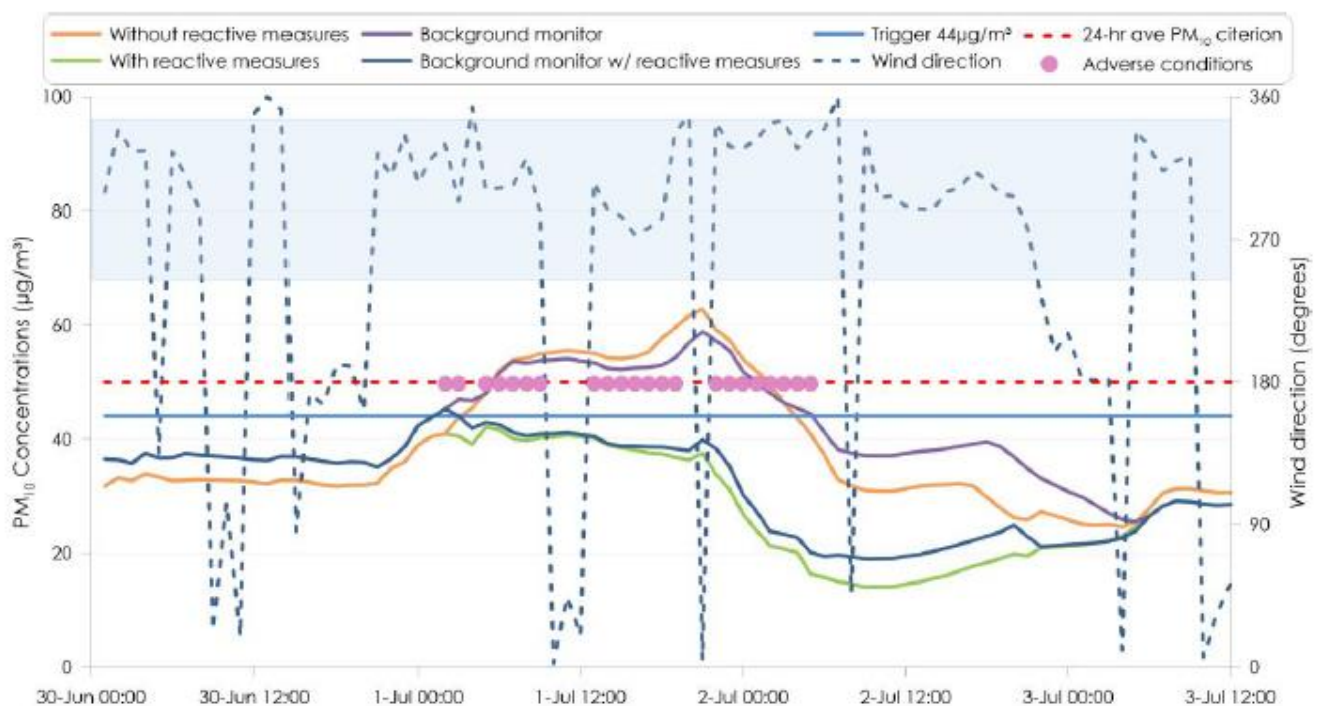
The EPA previously recommended that this issue had not been adequately addressed.

The EPA recommended that the proponent identified the specific triggers and specific actions that are modelled and therefore proposed to be used to manage particulate emissions and impacts at the affected receptors, both for Muswellbrook and isolated receptors, to demonstrate they will be able to manage the particulate emissions and impacts.

Proponent response

The Supplementary Information (September 2021) clarifies that the revised analysis applies the reactive measures (shutting down activities in the pit and overburden areas, while the CHPP and wind erosion emission continue) when the EPL trigger levels for Muswellbrook NW monitor and the trigger levels in the Mount Pleasant AQMP occur and no additional, lower or alternate trigger levels have been applied.

The Supplementary Information (September 2021) has improved the presentation of the data (Graph 1) to assist EPA's interpretation of the analysis. The analysis was provided for the sensitive receptor while the monitoring data (now included) is where the trigger level applies.



Graph 1 – Timeseries showing the effect of implementing reactive measures at Receiver 112

The EPA has determined this matter has been adequately addressed, and provided the recommended condition of approval (above) in relation to this matter.

Receptors subject to acquisition rights - PM₁₀ incremental exceedances

The EPA advised it was not explicitly clear if there are additional receptors that will have acquisition rights under the proposal.

Proponent response

The Supplementary Information (September 2021) has included a table summarising the receptors that would have acquisition rights under the proposed project.

Basis	Development Consent DA 92/97	Project (SSD 10418)
Noise	23, 45, 47, 67, 96, 102, 108, 112, 118, 120, 120c, 121, 136, 143a, 143b, 143c, 143e, 147, 153a, 156a, 157a, 158, 159, 447, 448, 449	136, 143a
Noise and Air	43, 43b	118, 120, 120c, 121, 143b, 143e, 147, 153a, 154, 154b, 156a, 157a, 159
Air	20, 21	112
<i>Total Number of Eligible Receptors</i>	30	16

This matter has been adequately addressed in the proponents response.