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EPA Advice on Modification to SSD-5579

Dear Ms Allan

Thank you for the request for advice from Public Authority Consultation (PAE-36057224), requesting the review by the NSW Environment Protection Authority (EPA) of the Modification to SSD-5579 at Western Coal Services (WCS).

The EPA has reviewed the following document:

- *Western Coal Services Project – Modification report for modification to SSD-5579 – EMM* (December 2021).

The EPA understands the proposal is for:

- Springvale coal to change the existing water management system at Springvale Coal Services Site (SCSS) to facilitate the transfer of water between WCS and other operations, and to improve the quality of water discharged to Wangcol Creek.

In addition, the modification seeks to comply with a Pollution Reduction Program (PRP) placed on the WCS Environment Protection Licence (EPL 21229) in December 2020. The PRP requires an evaluation of options for the long-term management of water being discharged from licenced discharge point 1 (LDP001) at WCS into Wangcol Creek, a tributary of the Coxs River.

Based on the information provided, the proposal is subject to an EPL under sections 43, 47, 55 of the *Protection of the Environment Operations Act 1997* (POEO Act) for coal works, clause 10 of Schedule 1 of the POEO Act.

The EPA has the following additional comments and recommendations:

1. Matters to be addressed prior to determination

The EPA acknowledges the lodgement of the modification as a pathway to enable compliance with the PRP to address the discharges from LDP001; with an offtake from Cooks Dam (WCS) and an offtake and discharge point at Pond D at Mount Piper Power Station (MPPS). With reference to the connection to the Springvale Coal Services (SCCS) / Regis transfer system as outlined in the modification, the EPA is aware that the Regis – McPhillamys Gold Project is yet to be determined, and at present is currently at 'Assessment' phase with the Department of Industry and Environment

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(DPIE). The EPA has therefore assessed this modification on the basis that the water transferred to MPPS for treatment and processing would remain as an ongoing management system, and any transfer to the Regis – McPhillamys Gold Project is at this stage a potential future option.

To understand the potential environmental impacts of the modification, the EPA requires clarity around the daily volumes of water proposed to be piped to MPPS. Listed within Table 4.1, page 20 of the modification, it is stated that up to 15.6 ML/day of water would be transferred to the SCCS-Regis transfer system, and up to 2.6 ML/day piped to MPPS. *The EPA requires clarification on the volumes, as this appears to imply that a total of 18.2 ML (15.6 + 2.6) could be produced and discharged from LDP001 daily.* It is the understanding of the EPA that 18.2 ML/day exceeds the historical daily volumes discharged from LDP001.

Within Section 8.2 – Alternatives, page 74, dot point 4 states that treatment using brine concentrators (existing or new) would be cost prohibitive to purchase, and the existing system is constrained in capacity. This statement appears to be in contradiction with Section 2.3 – Transfer of Water to MPPS, page 8, stating that water transferred to MPPS from SCSS will be temporarily stored within Pond D prior to treatment within MPPS's brine concentrators, with the permeate water transferred to MPPS's cooling towers. *The EPA therefore requires clarification on the use of brine concentrators at MPPS or elsewhere.*

In line with requiring greater clarification around the daily volumes of water being discharged from LDP001, the EPA requires clarification around any brine waste stream generation, disposal and or handling. The EPA notes that dot point two of Section 1.5.2 – Springvale Water Treatment Project, page 5, acknowledges that a "separate modification will be prepared by Springvale Coal to modify SSD-7592 to allow temporary storage of water within Pond D, treatment of water within MPPS's brine concentrators, transfer of permeate to MPPS's cooling water system and management of brine".

The EPA considers the generation and management of brine to be an important factor in reviewing this modification, despite occurring on a separate premises at MPPS; this modification could have benefitted from providing potential scenarios of brine generation and management, and an assessment of disposal and potential impacts to surface and groundwater. *The EPA is aware of the issues around handling and disposal of brine waste at MPPS, and the nearby Veolia plant, and therefore requests additional information on this matter.*

The EPA supports the proposed modification but makes the above comments and requires the additional information to ensure the project in its entirety is fully understood.

If you have any questions about this request, please contact Allan Adams on (02) 6333 3804 or via e-mail at EPA.Southopsregional@epa.nsw.gov.au. For general enquiries to the EPA please call (02) 9995 5000 or e-mail info@epa.nsw.gov.au.

Yours sincerely



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