



DOC22/277571-8

The Department of Planning and Environment
Return via the Major Planning Portal

Attention: Mr Philip Nevill

8 June 2022

Dear Mr Nevill

EPA Advice - Dubbo Project Modification 1 Report - Project Layout and Processing Changes (SSD-5251)

Thank you for the invitation from the Department of Planning and Environment (DPE) sent to the Environment Protection Authority (EPA) on 24 March 2022 seeking comment on Australian Strategic Materials (Holdings) Ltd's (Proponent) Modification 1 Report - Project Layout and Processing Changes (SSD-5251) for the Dubbo Project (Proposal).

The EPA has reviewed the Dubbo Project Modification 1 Report (SSD 5251) dated March 2022 prepared by R.W. Corkery & Co. Pty. Limited on behalf of the Proponent and accompanying appendices and understands that the Proposal relates to the following:

- Construction and operation of:
 - Chlor-alkali Plant for the production of hydrochloric acid and sodium hydroxide for use in on-site processing operations
 - A Brine Concentrator to maximise water recovery
 - A conveyor between the Processing plant and Administration Area and the relocated Salt Encapsulation Cells
- Relocation of:
 - Salt Encapsulation Cells from the approved location southwest of the Open Cut to the liquid Residue Storage Facility Area 3
 - Solid Residue Storage Facility from the approved location west of the Waste Rock Emplacement to the Liquid Residue Storage Facility Area 5
 - Rail Container Laydown and Storage Area from the approved location to an area immediately west of the approved location
- Reclassification of various approved disturbance areas to permit alternate uses
- Realignment of sections of the approved Macquarie River Water Pipeline, located entirely within the Project Site, and an extension of approximately 600m of the pipeline to allow for connection to the water supply bore
- A range of adjustment to the approved Project Site Layout
- Extended construction hours for non-linear infrastructure to be 24 hours a day, 7 days a week
- Extension of the Project Life by eight (8) years from 31 December 2037 to December 2045.

Phone 131 555
Phone +61 2 9995 5555
(from outside NSW)

TTY 133 677
ABN 43 692 285 758

PO Box 2111
Dubbo
NSW 2830 Australia

L1, 48-52 Wingewarra St
Dubbo
NSW 2830 Australia

info@epa.nsw.gov.au
www.epa.nsw.gov.au

The EPA provides its comments on the Proposal below:

1. Hours of Construction Operations

The existing approved hours of construction operation are 7am to 6pm Monday to Friday, 8am to 1pm Saturday, and at no time on Sundays or public holidays. The Proposal seeks an extension to the construction hours to 24 hours a day, 7 days a week.

The EPA can support the proposed modification of construction hours. If approved the Proponent will have to make a separate application to vary Environment Protection Licence (EPL) 20702.

2. Road Noise Barrier

The Proponent proposed to modify condition 2 of schedule 3 of the approval SSD-5251 that requires the construction of a 3 m high, 1 km long road noise barrier on land owned by Taronga Western Plains Zoo.

The EPA can support the proposed modification if alternative noise mitigation measures provide noise reduction equivalent to that provided by the approved road noise barrier condition 2 of schedule 3 of SSD-5251. The proponent must develop any noise reduction mitigation measure in consultation with Taronga Western Plains Zoo and the EPA.

3. Chlor-alkali Plant

The modification proposes to construct and operate a Chlor-alkali Plant that has a capacity to produce approximately 100 000tpa of 34% Hydrochloric acid (HCl) and 95 000 tpa of 32% Sodium Hydroxide (NaOH).

The "Ore processing facility" definition in SSD-5251 must be updated to include Chlor-alkali Plant. The EPA requires the Chlor-alkali Plant to be included in the Processing and Design Validation in conditions 21 and 22 of schedule 3 of SSD-5251.

4. Brine concentrator

The modification proposes to construct and operate a Brine concentrator to recover rare metals and rare earth elements for further processing off site and maximise water recovery.

The "Ore processing facility" definition in SSD-5251 must be updated to include the Brine concentrator. The EPA requires the Brine concentrator to be included in the Processing and Design Validation in conditions 21 and 22 of schedule 3 of SSD-5251.

5. Other

The Dubbo Project is subject to EPL 20702 issued by the EPA under the *Protection of the Environment Operations Act 1997* for the scheduled activities of: mining for cement or lime works; chemical storage; extractive industries; mining for minerals; mineral processing and crushing, grinding and separating. If Modification 1 is approved the Proponent will be required to make application to vary their EPL to add schedule activity "Chemical Production".

If you have any questions about this matter, please contact Mr Joshua Loxley on (02) 6883 5333 or by email at info@epa.nsw.gov.au.

Yours sincerely



NARELLE SARGENT

Manager

Regulatory Operations Regional West