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**MOOLARBEN OC3 EXTENSION PROJECT – MOOLARBEN COAL OPERATIONS (MCO)
(SSD-33083358)**

**Comments on MCO Responses to Agency Advice on Submissions and Amendment Reports
(PAE-78226232)**

Dear Ms Lucas,

I am writing in response to your request for the Environment Protection Authority (EPA) to review the responses to agency advice on the Submissions and Amendment Reports from Moolarben Coal Operations Pty Ltd (MCO) for the Moolarben OC3 Extension Project (the project).

The EPA has reviewed the following documents:

- *MCO Response – RFI 1- Cover letter* – Michael Moore (Yancoal Manager – Approvals) – 25 November 2024
- *MCO Response RFI 1 Attachment 4 – EPA* – Moolarben Coal Operation Pty Ltd

The EPA has reviewed the *MCO Response to RFI – Attachment 4 – EPA* (Attachment 4) and notes it has not fully addressed the EPA's response to submissions (RTS) on this project from 17 May 2024 in relation to the **Air** component.

Attachment 4 has provided additional information and clarity regarding the modelling assumptions and has addressed 4 of the 6 issues raised by the EPA's submission of 17 May 2024. However, the EPA proposes that conditions of approval may resolve the outstanding issues.

With regards to the **Greenhouse Gas Assessment** component of Attachment 4, the EPA similarly proposes conditions of approval to ensure currency of the Greenhouse Gas Management Plan (GHGMP) prior to commencement of the OC3 Extension Project.

The EPA has the following comments and recommendations:

Matters to be addressed with conditions of approval or AQMP:

1. **Air:**

The EPA recommends the following conditions of approval or requirements of the Air Quality Management Plan (AQMP) to resolve the outstanding issues regarding uncertainty in meteorological

modelling, and the matter of predicted compliance with impact assessment criteria relying on reactive measures:

Uncertainty in meteorological monitoring:

- Haulage roads must be maintained and watered to achieve a 90 % dust control efficiency at all times.
- The proponent must ensure that sufficient water is available at all times throughout the project lifetime to adequately control fugitive dust emissions.
- Materials handling activities must be postponed or relocated if wind speeds are >8 m/s and in the direction of offsite receptors.
- The maximum disturbance areas due to OC3 operations must not exceed 675 ha.

Evaluation of effectiveness of reactive management practices:

Within 12 months of approval of the OC3 extension, and every year thereafter, the licensee must undertake a review of the AQMP, and the proactive and 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 activities and review undertaken for the previous year of operations. The report must include but it is not necessarily limited to:

- a) Summarise 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 (particulate concentrations and/or meteorology) and associated actions, initiated in the previous year of operations to minimise offsite dust impacts.
 - IV. The number of hours reactive management methods were used, and the triggers they were initiated from.
- b) An evaluation of the effectiveness of the reactive management measures in minimising dust (PM₁₀, PM_{2.5}) impacts at receptors,
- c) Where exceedances of particulate criteria at any ambient monitoring station are observed, an evaluation of the contributing factors must be undertaken.
- d) Following the review, include all recommendations of any necessary changes to the AQMP, monitor locations (particulate and meteorology), trigger levels and/or actions required to mitigate offsite dust impacts.

2. Greenhouse Gas Management Plan:

The EPA recommends the following conditions of approval to ensure the existing GHGMP is updated prior to commencement of activities related to the OC3 Extension Project to address gaps previously raised by the EPA RTS dated 17 May 2024.

- Prior to commencing operations related to the OC3 Extension project, the Applicant must update, formalise, and implement the existing greenhouse gas management plan (the plan). The plan's preparation should be informed and consistent with the principles in the most recent version of the NSW EPA Guide for Large Emitters. The plan must include (but not limited to) the following:
 - *Measurable GHG emission goals.*
 - *Detailed energy efficiency plan.*
 - *Commitment to monitoring, reporting and continuous improvement.*
 - *Expected impact of the Safeguard Mechanism Baseline on year-to-year emissions.*

- *Comparison of emissions to NSW Government's legislated emissions reduction targets.*

NOTE:

The preparation of the Plan does not preclude the consent holder from preparing and providing additional information in accordance with requirements under the EPA's regulatory framework, including conditions in the Environment Protection Licence.

If you have any questions about this request, please contact Jacques Theron on (02) 6333 3818 or via email at info@epa.nsw.gov.au.

Yours sincerely



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