



16 April 2021

Department of Planning, Industry and Environment
Attention: Stephen O'Donoghue, Director - Resource Assessments
12 Darcy Street
Paramatta NSW 2124

Via email: stephen.odonoghue@planning.nsw.gov.au

Dear Mr O'Donoghue,

RE: TARRAWONGA COAL MINE MODIFICATION 9 – RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

Please find enclosed a response to the request for additional information received from the NSW Department of Planning, Infrastructure and Environment (DPIE) on 26 March 2021 in relation to comments received regarding the Tarrawonga Coal Mine Modification 9 (the Modification) from the Resources Regulator and NSW Environment Protection Authority (EPA).

Resources Regulator

Table 1 below provides responses to feedback received from the Resources Regulator on the Modification.

NSW Environment Protection Authority

Whitehaven agrees with EPA's comment regarding application of the *Waste Avoidance and Resource Recovery Act 2001* and will implement waste hierarchy principles consistent with Section 2.1 of the Modification Report, which provides that Tarrawonga Coal Pty Ltd would continue to investigate feasible and reasonable opportunities for recycling heavy vehicle waste tyres throughout the mine life.

The recommended licence conditions provided by EPA are considered to be generally acceptable, with the exception of those where amendment is recommended in relation to storage areas and heights to enable effective implementation. These are summarised in Table 2 below. A variation to the Tarrawonga Coal Mine's Environment Protection Licence (EPL 12365) to permit waste tyre disposal and incorporate the recommended conditions would be required following determination of Modification 9 and prior to commencement of on-site waste tyre disposal.

If you wish to discuss or require any further information to progress the assessment of the Modification application, please do not hesitate to contact Tony Dwyer on (02) 6741 9316 or TDwyer@whitehavencoal.com.au.

Yours sincerely

WHITEHAVEN COAL LIMITED

Tony Dwyer

Group Manager – Approvals and Environment

Table 1
Response to Request for Additional Information – Resources Regulator

Resources Regulator Comment	TCPL Response
<i>Based on the review of the modification report, the Resources Regulator advises that it has no specific comments regarding mine safety in relation to the proposed Modification.</i> <i>In relation to mine rehabilitation the following should be included in the proposal.</i>	Noted.
1. <i>Waste Management Plan</i> <i>A commitment that the waste management plan is updated to include the changed management of waste tyre disposal.</i>	Waste monitoring and minimisation measures implemented at the Tarrawonga Coal Mine would continue to be reported in the Annual Review in accordance with Project Approval (11_0047), including additional requirements relevant to waste tyre disposal. Waste tyre disposal management is detailed in Whitehaven's draft <i>Mine Tyre Disposal Procedure</i>, which would be reviewed periodically and amended as required.
2. <i>Placement location in emplacement area</i> <i>Details of the location of parameters for where tyres will be disposed of within the emplacement should be identified (eg. away from emplacement edges or outer edges and depth of burial).</i> <i>The height of placement within the Overburden Emplacement Area should be determined to ensure there is no loss of structural integrity within the area during or following rehabilitation. Management controls addressing risks related to placement locations should be developed.</i>	Section 2.3 and Appendix B of the Modification report detail a proposed disposal methodology, including a process to identify and record disposal locations. A pre-task risk assessment would be completed prior to disposal, and must consider the following: • fire and safety hazards and their management; • potential for saturated/perched aquifers to be disturbed or impeded; • required depth to prevent uprising and ensure stability of the final consolidated landform; and • proximity to coal rejects, potentially acid-forming material and depth of cover.
3. <i>Placement volume limits</i> <i>Details of the volume of tyres to be placed at each location have not been identified (eg. cell size and volume limits).</i>	Placement volume limits at each disposal location would be determined in accordance with the proposed disposal methodology detailed in Section 2.3 and Appendix B of the Modification Report, in consideration of the conclusions of a pre-task risk assessment. Detailed mine planning information will inform selection of appropriate disposal locations and volumes during the life of the operation, and therefore, limits cannot be provided at this stage.

Table 2
Response to EPA Advice on Modification Application

EPA Comment	TCPL Response
<i>1. Matters to be addressed with conditions</i> <i>a. Application of the waste hierarchy</i>	Noted
<i>b. Limit to the number of and origin of tyres that can be disposed of at the premises in any one year</i>	Noted
<i>c. Environmental considerations</i> <i>The EPA therefore recommends that the following conditions are added to the project approval should the modification be approved:</i> <i>.....</i> <i>O5.2 Stockpiles of any heavy plant waste tyres stored at the premises awaiting disposal must:</i> <i>(a) be less than 3 metres in height;</i> <i>(b) not cover an area of more than 200 square metres; and</i> <i>(c) not be located within 10 metres of any other flammable or combustible materials.</i>	TCPL advise that the proposed height of 3 metres O5.2 (a) is not practical given that some tyres have a wider diameter. It is recommended that the height should be a minimum of 4 metres to ensure safety and accommodate storage heights of large tyres. TCPL presume the specified area of 200 square metres proposed in the draft condition O5.2 (b) is incorrect and is intended to state 2000 square metres. A minimum of 2000 square metres would be required at Tarrawonga Coal Mine to ensure a safe and appropriate area to manage the storage and rehandling of tyres.