



22 March 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) in relation to comments received regarding the Tarrawonga Coal Mine Modification 9 (the Modification) from Narrabri Shire Council.

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

A handwritten signature in black ink, appearing to be "Tony Dwyer", written over a blue circular stamp.

Tony Dwyer
Group Manager – Approvals and Environment

Table 1
Response to Request for Additional Information – Narrabri Shire Council

NSC Comment	TCPL Response
1. Council request the following information be provided by the proponent before any possible effects of the proposed modification can be adequately considered and assessed; • An Environmental Plan/Assessment to show impact on the environment along with, - Volume of land available, and - Volume of land suitable for the volume of tyres for disposal.	Section 2 of the Modification report provides a detailed environmental review of proposed waste tyre disposal at the Tarrawonga Coal Mine, including consideration of recycling, existing disposal practices within Australia and acceptability of on-site disposal. Correspondence received from the NSW Environment Protection Authority informed the scope of assessment. Section 2.3 and Appendix B of the Modification report also detail a proposed disposal methodology, including a process to identify and record disposal locations. This process will occur progressively in line with updated mine planning to optimise disposal and prevent environmental impacts. On this basis the volumes of land will vary over time, however due to the scale of operations relative to the volume of tyres requiring disposal, it is apparent that sufficient suitable land will be available for the proposed activity.
• Operational Procedures of how the tyres will be land applied. - The method of how they will be disposed of, and - Land Closure process following the void space being full.	Appendix B of the Modification report provides a draft <i>Mine Tyre Disposal Procedure</i> prepared by Whitehaven. The draft <i>Mine Tyre Disposal Procedure</i> provides a standard work practice for the management and disposal of waste tyres, including disposal method, hazard assessments, tracking of disposal locations and monitoring and reporting. Table 10, Condition 61 of the Tarrawonga Coal Mine Project Approval (11_0047) requires that the mine site must be rehabilitated to be safe, stable and non-polluting. A Final Void and Mine Closure Plan would be prepared prior to the end of the mine life to demonstrate this objective would be satisfied (including consideration of disposed waste tyres) in accordance with Condition 65(d) of the Project Approval (11_0047).
• Confirmation of what Tarrawonga Coal Mine's existing Environmental Protection Licence with the New South Wales (NSW) Environmental protection Licence with regards to tyres,	The Tarrawonga Coal Mine's existing Environment Protection Licence (EPL 12365) does not currently permit the disposal of waste tyres on-site. A variation to EPL 12365 would be required following determination of Modification 9 and prior to commencement of on-site waste tyre disposal.
• Procedures that are New South Wales Regulator approved (not Queensland), and	There are currently no equivalent NSW Government waste tyre disposal management procedures, policies or guidelines available. Notwithstanding, additional relevant information specific to the mining industry was sought from the Australian Coal Association Research Program and Tyre Stewardship Australia.

NSC Comment	TCPL Response
What monitoring/sampling processes are in place for contaminated soils and water for his process.	As described in Section 2.4 of the Modification report, monitoring of disposed waste tyres will be undertaken as a component of rehabilitation monitoring, consistent with a Mining Operations Plan (MOP) and other applicable site management plans. An existing groundwater quality monitoring program is also undertaken in accordance with the Tarrawonga Coal Mine Water Management Plan and includes a suite of analytes which will assist in identifying any potential contamination from waste tyre disposal and prompt remediation actions.

