From: David Lovell
To: Colin Phillips
Subject: Northern Coal Logistics - residual issues - RTS report by Centennial Coal.
Date: Thursday, 19 March 2015 8:41:16 AM

Dear Collin, please find Council's response to the Applicant's Response to Submission Report for the Northern Coal Logistics Project by Centennial Coal, where residual issues are identified.

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Response to Submissions Report – LT Creek

With regards to remediation of LT Creek, Council previously raised the following issue.

Centennial Coal had previously discussed including contributions to the remediation of LT Creek as part of future applications relevant to the site, but noted that this issue is not addressed in the current application. It is considered that clarification from Centennial Coal be provided as to their intentions with regards to contributions to dredging as part of this current application. (LMCC)

Officers have reviewed response, and it identifies that Centennial Coal has no intention to contribute to towards dredging of LT Creek as part of the Northern Coal Logistics project. This being the case, Council has concerns that the project appears to provide no mechanism for Centennial Coal to address the historic downstream impacts resulting from the operations at the Newstan Colliery site, yet seek to further increase discharges without dealing with the existing downstream issues. Council has concerns that additional discharges into LT Creek be could be approved without any suitable mechanism for addressing the impacts of historic discharges being identified and enacted.

Council officers have reviewed the additional information provided on metal and salinity discharges, and have concerns that the assessment of the impacts form these discharges are not adequately addressed, particularly with regards to the cumulative impacts.

Response to Submissions Report – Air Quality

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Council's specific air quality condition was not referenced in the "Response to Submissions" document, however, it was similar in intent to that from the EPA (below). In essence, the Air Quality Impact Assessment identified that exceedances to the PM10 standard would be predicted when production increases beyond 5 MTPA, and an option of controlling for air quality was presented. I noted (and the EPA noted), that this option for managing air quality should be a condition of approval.

Northern Coal did not commit to the condition as proposed by the EPA and Council. Given that sensitive receptors are predicted to be exposed to hazardous air pollutants above the national health standard should this control measure not be implemented, Council maintains that a condition of approval is the correct course of action, as recommended by the EPA.

Response to Submissions Report – Rail Impacts

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The response does not satisfactorily address Council's concerns with regard to the likely

cumulative impacts of the development on the regional adequacy of the rail network and available infrastructure, in light of other recent mine approvals also reliant upon the same rail network. The application was not supported by a rail study, rather an assessment within traffic impact assessment. The proposal does not adequately consider the likely cumulative impacts of the development and what if any additional infrastructure regionally may be required. In the minimum this assessment should be undertaken. If the Department countenances approval of the development without this regional assessment, in the minimum the number of trains should be conditioned at a maximum of 8 per day.

Thank you for the opportunity to comment.

Kind Regards,

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