

MOD 11- MPPS -Application Number
SSD-7592-Mod-11

Dear Sir/Madam,

I oppose and object this current modification for the reasons below. Whilst understanding the fiscal need and energy being produced now communities and the environment is not being protected. Yes, it provides employment for 3 companies EnergyAustralia, Centennial & Viola who manage the current desalination plant with making huge profits from a product that is owned by all Australians (coal).

1. Purely it shows citizens this is a lack of not going above and beyond by both companies have no reasoning or respect for the environment with this proposal setting a precedent to harm aquatic life;
2. No intentions to achieve a Neutral or Beneficial Effect (NorBE). Electrical conductivity needs to remain no higher than 350EC, as it is well documented that above this sustainable life in waterways has lost its integrity and failure of healthy waterways;
3. Shows the complete failure of government legislation for both companies to maintain water quality and with the historic and current contamination from direct mining discharge from Centennial Coal washery as with Mt Piper Ash Repository leaching into the groundwater and seeping into Wangcol Creek that feeds into upper Cocks River System. decades of sacrificing this area. Equally the loss in the Gardens of Stone SCA upland protected Threatened Ecological Communities/THPSS, depleting aquifers;
4. This is like Groundhog Day with the current and historic evidence already written and provided to the Dept & IPC so many times throughout the history of both companies refusing to step up work together with providing a long-term beneficial outcome for the environment;
5. Citizens led to believe that the existing desalination plant would be zero discharge and cause no harm to the environment or waterways. Only to find that desalination of excess mine discharge water from Springvale Mine & Angus Place mine has failed:
 - i) Citizens of Lithgow finding that not all the discharge water was being treated and only a small amount fully treated water for boilers at Mt Piper Power Station, the remainder blended thus increasing salinity and heavy metal levels. No increase in volumes of mine water discharged will have a Neutral or Beneficial Effect - total loads of salt and heavy metals will increase, and exceed ANZECC guidelines limits;
 - ii) This has been the process since the desalination plant became operational in 2017;
 - iii) Mt Piper is not at capacity 24/7, needs less water & less coal to generate 8% of the State's electricity, and this MOD will determine whether that unused mine water will be fully or partially treated for planned and unplanned outages for many years;
 - iv) EnergyAustralia CEO relays that Mt Piper would economically benefit now by being standby with the ability to ramp down to 150MW. [Financial Review December 2024 EnergyAustralia's fight for future of NSW coal plant](#)¹;
 - v) Centennials proposal for this Modification intends to release an additional 42 million litres per day of mine waste water to Thompsons Creek Reservoir (for up to 111 days at a time) to cover Mount Piper outage periods. This will consist of up to 18 million litres per day of water through the water treatment plant and 24 million litres a day of untreated water (only sediment will be removed). ***This does not include unplanned outages;***

- vi) It is obvious that all companies involved have discussed this situation with excess mine water long before now as with the planned shut downs for Mt Piper. This is not acceptable and the outcome that relates to mine discharge water will as with current situation that all mine water treated or not at all will meet the Norbe EC at 350 and higher levels of heavy metals. Correct me if I am wrong but citizens believe this has been an illegal activity??
- vii) Given the reduction of coal for Mt Piper and continues to reduce due to renewable increasing and that Springvale mine has a licence to operate till 2028 providing coal as with coal supplies from Clarence, Mt Airly and Invincible Open Cut Mine. There is no need for the current proposal for Angus Place West to proceed. If however, it were to proceed then this current modification should be withdrawn and a new DA prepared for Angus Place West.

Recommendations:

The historic & current issues well known to the Dept, IPC and Ministers with ongoing contamination to our waterways sacrificing the upper Cocks River and Wangcol Creek for years. An immediate inquiry should be actioned. This does not solve the current critical situation with continuation of contamination and all companies involved must have severe penalties imposed until a solution has been determined or both facilities shut down.

All companies involved who profit from their operation those being Centennial, EnergyAustralia Mt Piper PS, Veolia, Sydney water be required to financial inject to cover the costs of additional desalination plant to achieve no contamination discharge into our waterways and that all brine to be transported off site to a location for dispersal.

Thank you for the opportunity to make a submission for this proposed project.

Your sincerely

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