

Our reference : DOC12/25028 LIC07/1428-09
Contact : Lindsay Fulloon (02) 6773 7000
Date : 20 June 2012

Mr Paul Freeman
Planner – Mining Projects
Department of Planning and Infrastructure
GPO Box 30
SYDNEY NSW 2001

Dear Mr Freeman

Boggabri Coal Mine s75W modification application

I refer to the Boggabri Coal Pty Limited s.75W consent modification application you referred to the Environment Protection Authority (EPA) via e-mail on 6 June 2012. The EPA has reviewed the information provided (comprising the Development Consent Modification Environmental Assessment and Appendices) and offers the following comments for the Department of Planning and Infrastructure's (DoP&I's) consideration in the determination process.

Noise Impacts

The EPA notes that the site is already subject to an Environment Protection Licence (EPL) that contains noise limit conditions. The EPA also notes that while the Noise Impact Assessment (NIA) states that predicted L_{Aeq} (15minute) noise levels will exceed the project specific noise levels (PSNLs) by up to 4dB(A). The PSNLs established in the NIA of 35dB(A) also form the current noise limits applying via environment protection licence no. 12407. Section 6.2.4 of the EA states that "*Boggabri Coal will ensure that the PSNC are met at all privately owned residences for the duration of this Modification*" and lists additional noise mitigation measures to be implemented. EPA therefore recommends that, should this modification be approved, the existing noise limits applying at the site remain unaltered (i.e. at 35dB(A) for all non-project related residences).

The EPA also notes that the EA does not appear to make any commitment to real-time noise monitoring to ensure that operations can be modified where necessary to ensure compliance with the PSNLs at all times. The EPA therefore also recommends that DoP&I requires real-time noise monitoring as a condition of any approvals granted further to the modification application.

Air Impacts

The EPA notes that the proponent seeks to increase the height of the overburden emplacement area (OEA) by 55 metres from that currently approved. After reviewing the Air Quality and Greenhouse Gas Assessment (AQGGA) the EPA is satisfied that this will not result in significant change in the air impacts from the proposal. The EPA has reviewed the AQGGA and arrived at this position after considering that:

- While the increase in OEA height would increase surface area exposed to wind erosion, and emissions due to overburden handling, these have been adequately accounted for in the presented dispersion modelling;

- Mining will continue at a ROM coal production rate of 3.5Mtpa, when the impacts have been modelled at double that rate (i.e. 7Mtpa);
- Predicted 24hr average PM₁₀ impacts at all private residences are below the EPA assessment criterion (50µg/m³); and
- The neighbouring Tarrawonga Coal Mine already has acquisition rights to the only receptor predicted to exceed the annual criterion for PM₁₀.

If you have any further enquiries about this matter please contact Lindsay Fulloon in our Armidale office on 02 6773 7000.

Yours sincerely



ROBERT O'HERN
Head Regional Operations Unit – Armidale
Environment Protection Authority