



Your reference :
Our reference : EF13/4246; DOC15/146853-01
Contact : Ms Sheridan Ledger; (02) 6332 7608

Mr Paul Freeman
Senior Planner
GPO Box 39
SYDNEY NSW 2001

21 May 2015

Dear Mr Freeman

MOOLARBEN COAL MINE – STAGE 1 MODIFICATION 11 & STAGE 2 MODIFICATION 1

I refer to your correspondence of 1 May 2015 requesting the Environment Protection Authority (EPA) to provide comment on the proposed Moolarben Coal Mine – Stage 1 Modification 11 & Stage 2 Modification 2 (the Proposal).

As requested, the EPA has considered the Environmental Assessment (EA) for the Proposal. The EPA would like to provide the following comments in response to the EA.

Noise

Meteorological Data

When reviewing the Noise Impact Assessment (NIA) in the EA for the Proposal, the EPA considered the model input information/data utilised in the Moolarben Coal Mine Modification 9 Environmental Assessment (Mod 9 EA). In particular, the EPA considered the meteorological data used, the prevailing meteorological conditions utilised for the model, drainage flow conditions and the scenarios which are modelled.

As you may be aware, Moolarben Coal Mine (the Mine) operates two automated weather stations, one being located near the Stage 1 offices and the other approximately 3 kilometres west of open cut 2, near the Rayner residence. The NIA in the EA utilises meteorological data obtained from the weather station location near the Stage 1 offices while the Mod 9 EA utilised data from the weather station located in proximity to open cut 2 (Rayner residence). The EPA notes the prevailing wind direction utilised in the noise model for night time periods differs in each noise assessment. The NIA provides winds are generally south-westerly during autumn, winter and spring and in summer winds are generally easterly. The Mod 9 EA indicates winds are predominantly south east or north east throughout the year.

The Mod 9 EA includes the following text:

"...prevailing weather conditions identified using data from the Rayner residence weather station was found to be worst case from a noise perspective and was, therefore, adopted for the noise study to ensure a conservative approach."

As the majority of residences in proximity to the Mine are located to the south east of open cut 2 and given the prevailing direction utilised can alter the predicted noise levels from the Proposal, justification of the prevailing meteorological data utilised is recommended.

Modelled Scenarios

The EPA notes that two scenarios have been modelled, being 2016 and 2018 which represent typical operations at the Mine (as per section 6.4 of the NIA) and worst case noise impacts (as per section 6.4.1 of the NIA). The Mod 9 EA provided modelled scenarios for years 2, 6, 11, 16 and 21. When comparing predicted noise levels for the Mod 9 EA and 2016 for the Proposal, the EPA notes that a number of residences are predicted to receive noise level increases of 2-3 dBA as a result of the Proposal. In the majority of cases, these noise levels were not predicted to occur until years 6 or 11 of the Mine. While the increases do not require an alteration to the Environment Protection Licence, it is likely that such increases will be audible and may generate additional complaints.

Surface Water Management

The EPA notes the primary changes to the approved water management system will occur due to the removal of the approved haul road from open cut 4 to the stage 1 infrastructure area which is proposed to be replaced with a haul road between open cut 4 and open cut 1, with the proposed changes resulting in a reduction in the disturbance area.

To allow the EPA to provide comment on the proposed changes to the water management system required as a result of the Proposal, maps which clearly illustrate the proposed alterations should have been provided. While it is noted that up-catchment diversions and water infrastructure are identified in Figure 16 of the EA, it is at scale which is not adequate and the colour utilised for the legend is difficult to see and therefore interpret. An adequate map showing drainage information for the haul road between open cut 1 and open cut 4 is included in Figure 5.1 of the *Moolarben Coal Project OC4 South-West Modification Surface Water Assessment Review*. Similar mapping is not provided for the ROM area and the surface infrastructure area shown in Figure 15 of the EA.

The EPA recommends that further information is requested in relation to the:

- changes to water management system design, particularly in relation to the ROM area;
- how dirty water will be managed along the extent of the conveyor trace which is 60 m wide; and
- given the proposal to fill the open cut 1 void - the proposed ongoing need for mine water dam 10 and the need for OC1 mine water dam 1 proposed in the *Mod 9 Moolarben Coal project Stage 1 Optimisation Modification – Surface Water Impact Assessment (May 2013)* to replace mine water dam 10 once that area has been mined through.

The EPA recommends that revised mapping be obtained which indicates the proposed modified water management system as a result of the Proposal.

Environment Protection Licence

The Mine has advised the EPA that a licence variation application will be submitted in the short term following the approval of the Stage 2 activities. As part of that application, the EPA understands the Mine is currently considering requesting approval to conduct quarrying activities, with associated crushing at a scale which would require the activities to be included as an ancillary activity on the Environment Protection Licence (EPL). The EPA understands the quarrying and crushing activities are proposed to allow for the installation of dam DD1 with material won being utilised for the water management system.

The EPA is unaware as to whether such a proposal was assessed and considered as part of the Stage 2 approval process and therefore requests advice regarding its permissibility.

Should you have any further enquiries in relation to this matter please contact Sheridan Ledger at the Central West (Bathurst) Office of the EPA by telephoning (02) 6332 7608.

Yours sincerely

A handwritten signature in dark ink, appearing to be 'Darryl Clift', written in a cursive style.

DARRYL CLIFT
Head Central West Unit
Environment Protection Authority

