



THE COLONG FOUNDATION FOR WILDERNESS LTD.

Friday 20th September, 2019

Mining and Industry Projects
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam,

Submission regarding Springvale water treatment plant SSD 7592 Mod 4

Attn: Paul Freeman

Coxs River salinity problems

Coxs River salinity problems will not be resolved by commissioning the water treatment plant that is the subject of this modification proposal whilst LDP006 continues to discharge high concentrations of salt. Further efforts to significantly reduce salinity load on the Coxs River from LDP006 must now be required a regulatory priority. As a reminder to regulators, salinity levels are not just of sodium chloride, but includes salts of Arsenic, Aluminium, Cadmium, Chromium, Cobalt, Copper, Mercury, Lead, Manganese, Nickel, Zinc. High salt levels of these elements have no place in Sydney's drinking water supply.

Springvale Coal Services has recorded salinity at LDP006 in the Coxs River Catchment of 6400 $\mu\text{S}/\text{cm}$ in January 2018. The previously Springvale Coal Services recorded at LDP006, 5190 $\mu\text{S}/\text{cm}$ in June 2016 and 6680 $\mu\text{S}/\text{cm}$ in September 2017.

The salinity of the Coxs River at Maddox Lane was 1350 $\mu\text{S}/\text{cm}$ on 17/4/2018, the highest recorded was 1400 $\mu\text{S}/\text{cm}$ on 3/5/2016 by Lithgow Environment Group. These readings indicate Springvale's minewater (and associated ash dam at the Mt Piper power plant) are causing elevated salinity levels further downstream than predicted, as salinity is still 630 $\mu\text{S}/\text{cm}$ at the Six Foot Track some 95 km downstream of the Coxs headwaters (recorded by Lithgow Environment Group).

Given these data, the estimates given for the impact of Mod 4 on the Coxs River salinity passes into insignificance, even if the modelling were to underestimate the results.

Efforts to modify water treatment project

The Colong Foundation welcomes efforts by the proponent to accommodate additional mine water from Clarence Colliery at the Springvale water treatment plant. We understand that this is at least part of the reason for this Mod 4 to this plant.

Clarence mine water treated by the plant should then be discharged into the Coxs River, and not resold into another catchment. These additional flows would then dilute the salt from LDP006.

Thank you for the opportunity to comment on this modification proposal and we await commissioning of the new plant, augmented to accept mine water from Clarence Colliery.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K. Muir', written in a cursive style.

Keith Muir
Director
The Colong Foundation for Wilderness Ltd

PS. The advice that modification was to enable Clarence Colliery mine water to be treated at this plant came from several sources, including some close to the proponent. We welcome the enlargements and alterations to accommodate the additional source mine water.

KM.