

Your reference :  
Our reference : SF19/87530; DOC19/832968  
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**Springvale Water Treatment Project – SSD 7592 - Modification 4**  
**EPA comment on Modification Report**

I refer to the email received on 6 September 2019 from the Department of Planning and Environment (the Department) requesting the Environment Protection Authority (EPA) provide comment on the application submitted by Springvale Coal Pty Limited for a modification to the Springvale Water Treatment Project SSD 7592 Mod 4 (Mod 4).

The EPA understands that Mod 4 seeks the transfer of an additional 3060 ML of water to Thompsons Creek Reservoir (TCR) until 31 January 2020, including an increase in the transfer volume from 24ML/day to 36 ML/day during the period 1 and 31 January 2020.

The EPA notes from the *Springvale Water Treatment project Modification 4 – Modification Report (September 2019)* (the Report) that modelling indicates the additional water would result in an increase in the EC and alterations to the pH and phosphate as P, in TCR. It is also noted there is an environmental flow of between 0.3 and 0.8 ML/day from the TCR.

Section 3.2.5 of Appendix A of the Report provides that “*results demonstrate that overflows are not expected to occur even under the wettest of conditions for the Approved and Proposed scenarios*”. Noting the current water requirements of the Mount Piper Power Station (MPPS), which are directly related to power generation, and the assumptions made in the Report, the EPA considers there is a potential risk that overflows, or the need for controlled discharges, may occur.

Environment Protection Licence 13007 does not include a licenced discharge point from TCR. Historically water within the TCR has been equivalent in chemical composition to the downstream receiving environment. The modelling in the Report, now indicates that increases in water pollutants such as EC and phosphate are increasing to a level that is different from Pipers Flat Creek.

The EPA notes that the volume increase from 24ML/day to 36 ML/day coincides with the cessation of the use of the temporary desalinisation system operating at Angus Place colliery. Section 3.2.1 of the Report provides that “*the ongoing operation of the temporary desalination system to reduce transfer volumes is not considered a viable long term solution*”. While the use of the desalinisation plant at Angus Place may not be sustainable in the long-term, Mod 4 is for a month-long period only. Therefore, adequate justification for the transfer volume in terms of the continued use of the Angus Place desalinisation plant has not been provided.

The EPA therefore recommends that the proponent:

1. Develop a contingency strategy to account for the potential changes in water volumes in TCR as a result of changes in water use by MPPS because of its current reduced operation.

This contingency strategy should consider options for management of water that may be in excess of what can be safely stored in TCR and could include discharge, increases in environmental flow and/or continued use of desalinisation at Angus Place.

2. Investigates the requirement for a discharge point on EPL 13007 to authorise the discharge of water from TCR that will have an increased EC and altered pH and phosphate concentration as a result of the proposed MOD4.

Should you have any further enquiries in relation to this matter please contact Mr Matthew Prince at the Central West (Bathurst) Office of the EPA by telephoning (02) 6883 5354.

Yours sincerely

A handwritten signature in black ink, appearing to read 'SL', positioned above the printed name.

**SHERIDAN LEDGER**  
**Unit Head Central West Region**  
**Environment Protection Authority**