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Department of Planning, Industry and Environment
Returned via the Major Projects Portal

Attention: Mr Joel Herbert

4 November 2019

Dear Mr Herbert

**Statement of Environmental Effects Exhibition
Bulga Optimisation (SSD 4960) MOD 3 and Bulga Underground (DA 376-8-2003) MOD 7**

I refer to the email from the Department of Planning, Industry and Environment (DPIE) to the Environment Protection Authority (EPA) dated 30 September 2019 seeking the EPA's advice in relation to the adequacy of the proponent's Statement of Environmental Effects (SoEE) for the Bulga Optimisation (SSD 4960) Mod 3 and Bulga Underground (DA 376-8-2003) Mod 7 proposals. The EPA understands the SoEE incorporates both Proposals.

The Proponent, Bulga Coal Management Pty Limited, is proposing to extend the former open cut area currently occupied by the current tailing's storage facilities known as the Deep and Bayswater Pits and disturbing an additional 20.2 hectares to allow for the extraction of deeper coal resources. The Proponent is also evaluating whether underground mining operations can recommence. Changes to infrastructure servicing both open cut and underground operations will be required.

The EPA has reviewed the SoEE and has determined that it requires additional information to properly assess the proposal. The EPA's additional information requirements are provided at **Attachment A** to this letter.

If you have any questions about this matter, please contact Matthew Corradin on 02 4908 6830 or by email to hunter.region@epa.nsw.gov.au

Yours sincerely

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ATTACHMENT A – EPA additional information requirements

Air

- The Proponent must provide an assessment of particulate emissions from the existing approved operations at the Bulga Coal Mine and evaluate changes to air quality resulting from SSD 4960 Mod 3. This assessment is needed because the modification will result in new activities to the south of the existing project area. Incremental dispersion contour plots must be included.

The Air Quality Impact Assessment (AQIA) does not present a complete assessment of the air quality impacts from the current approved operations. Rather assumes SSD 4960 Mod 3 will not change air quality impacts. Predicted impacts above the assessment criteria are to occur to the north-east and north-west of the Bulga Coal Mine, towards Bulga. However, no particulate impacts above the EPA's assessment criteria are predicted to the south of the Bulga Coal Mine towards Broke. It is unclear how these impacts compare to the existing approved operations of Bulga Coal Mine.

- The Proponent must provide justification for the use of Properties 195, 217s and 311 for assessing the 24-hour PM₁₀ impact assessment criteria as well as identifying all properties predicted to experience additional exceedance days as a result of SSD 4960 Mod 3.

The AQIA predicts for the cumulative scenario that numerous private residences will exceed the 24-hour average PM₁₀ criteria of 50 µg/m³ over all years modelled (Figure 19 and Appendix D). The AQIA examines the potential contribution of each source to cumulative concentrations at three locations. Specifically, Property 195 is predicted to experience two exceedance days with a significant project only contribution of 24 µg/m³. Property 311 is also predicted to experience two exceedance days (9 µg/m³) and Property 217s is predicted to experience one exceedance day (6 µg/m³).

- The Proponent must provide an assessment of annual PM₁₀ incremental emissions and evaluate changes to air quality impacts solely as a result of the proposed SSD 4960 Mod 3.

The AQIA and Figure 25 predict that Property 1A will exceed the annual PM₁₀ criteria of 25 µg/m³ on three of the four years modelled. Property 1A also exceeds the Voluntary Land Acquisition and Mitigation Policy criteria and is entitled to voluntary mitigation and acquisition.

- The Proponent must provide additional information to confirm particulate emissions from haulage activities.

Information to evaluate particulate emissions from haulage activities is not provided in the AQIA. Missing information includes silt content, weight of truck, weight of load. This is required to calculate haulage emissions. The significance of the requested information is demonstrated in the following example:

Haulage of overburden from Main Pit to Main Dump (2022)

Parameter	Intensity t/yr	Silt content (%)	Truck Load (t)	kg/VKT	VKT (km)	Control	TSP emissions (kg)
AQIA	108,020,340	Not provided	230	4	9.2	85 %	2,592,488
EPA calculation	108,020,340	10 (NPI default)	230	8.57[#]	9.2	85 %	5,553,094

[#]The EPA's calculation under estimates emissions through the inability to include truck weight in the calculation of kg/VKT.

Given emissions from haulage activities are almost half (47% of TSP for 2026) of emissions for the project and the exceedances at receptors outlined above, the potential significant under estimation of the emissions inventory creates a significant risk to the surrounding communities.

Note: Cumulative impact figures (19, 25, 28, 30, 33, 36) only have impact assessment criteria contour line which limits the EPA's ability to assess cumulative particulate impacts.

Waste

- The Proponent must provide further details about all waste streams (classified as per the EPA's Waste Classification Guidelines) that will be generated as a result of activities associated with SSD 4960 Mod 3 and DA 376-8-2003 Mod 7, the expected quantities in tonnes and the manner in which the waste streams will be lawfully managed (recycled, reused and/or disposed of).