

A. S. Berecry  
130 Bullen Bullen Road  
Waukivory NSW 2422  
([vocaledge@bigpond.com](mailto:vocaledge@bigpond.com))

28/10/2013

Major Projects  
Department of Planning & Infrastructure  
GPO Box 39  
Sydney NSW 2001

Attn Mr P Freeman  
Senior Planner  
Mining Projects | Department of Planning & Infrastructure  
23-33 Bridge Street SYDNEY 2000 | GPO Box 39 SYDNEY 2001

**Proposed Rocky Hill Mine Project – Application SSD – 5156.**

This submission is made by an affected family on a farming property which shares a boundary of 4km with the proposed mine at Rocky Hill.

In my professional capacity as a coal geologist, I was contracted to do the coal exploration for Gloucester Coal, formerly known as BMI Mining.

Due to the size of the EIS and limited amount of time to respond to the application, these comments and recommendations are not based on the whole EIS but just the immediate areas that affect us as a family.

The issues that affect us are:

- Property prices and saleability
- Noise
- Dust pollution
- Blasting pollution and vibration
- Geology, resource and rehabilitation
- Greenhouse Gas Emissions

**Property values Issue:**

We share a **four kilometre boundary** with GRL mine site and have an aerial view of the proposed Rocky Hill into the main pits and coal handling areas.

There are two houses on the property which are approximately 1.2 kms from the mine site (see green coded property in Figure F below) and the most western part of the farm is only 600 metres from the mine site.

Whilst the main access to our property is via Waukivory Road, we and any potential buyers still have to drive into the township past the entrance to the proposed mine. This will have an enormous crippling impact on property values and significantly reduce the ability to sell the property.

Our current subdivision (our only superannuation) with several blocks leading to Fairbairns Road plans to take advantage of Fairbairns Road aspect which has magnificent views of the valley and the Bucketts mountains. Fairbairns Road had great prestigious value with small farms and new houses and very attractive and popular with Sydney tree changers. Now, all properties East of the railway line is mine owned by GRL, GCL and AGL which renders my subdivision worthless and unsaleable.

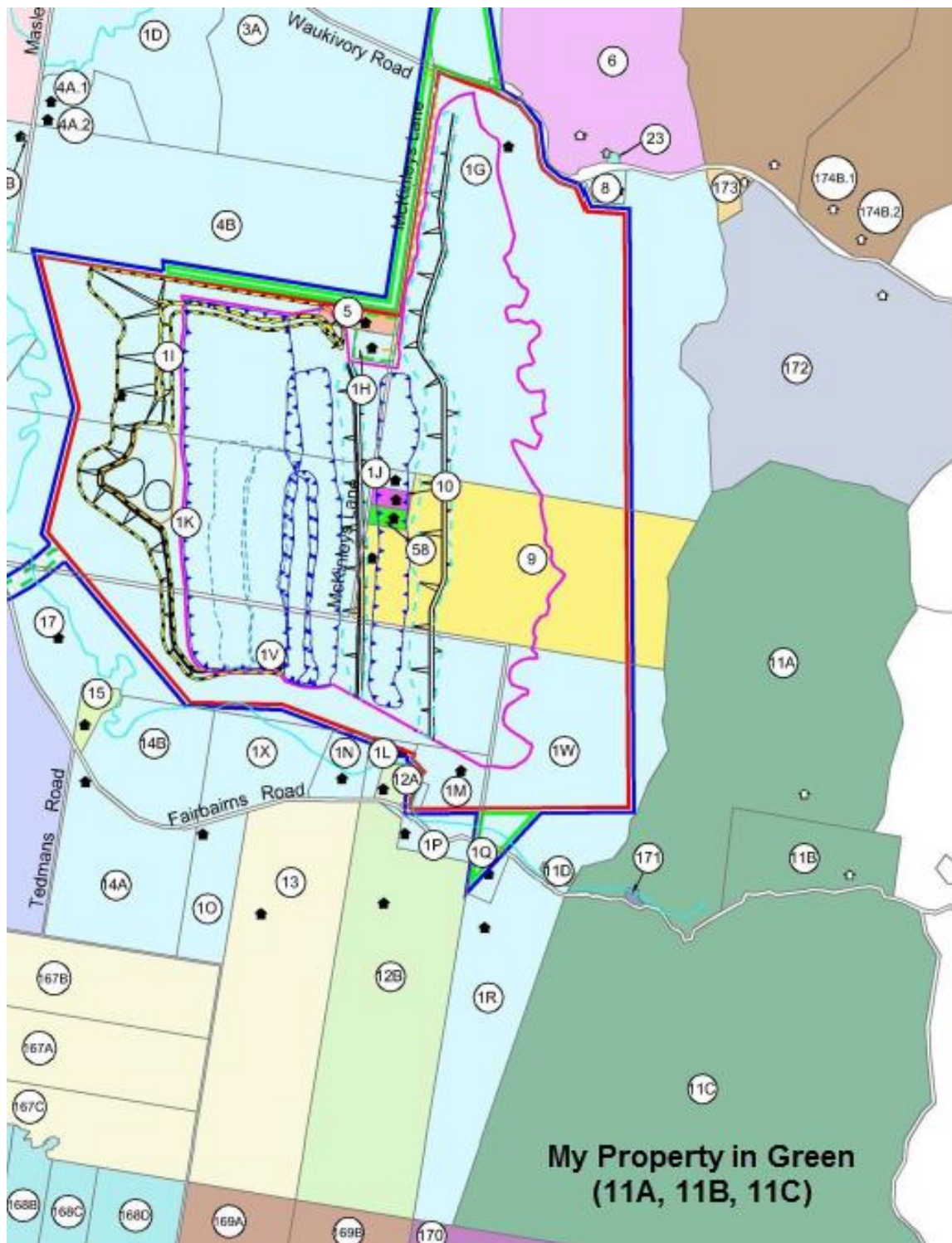
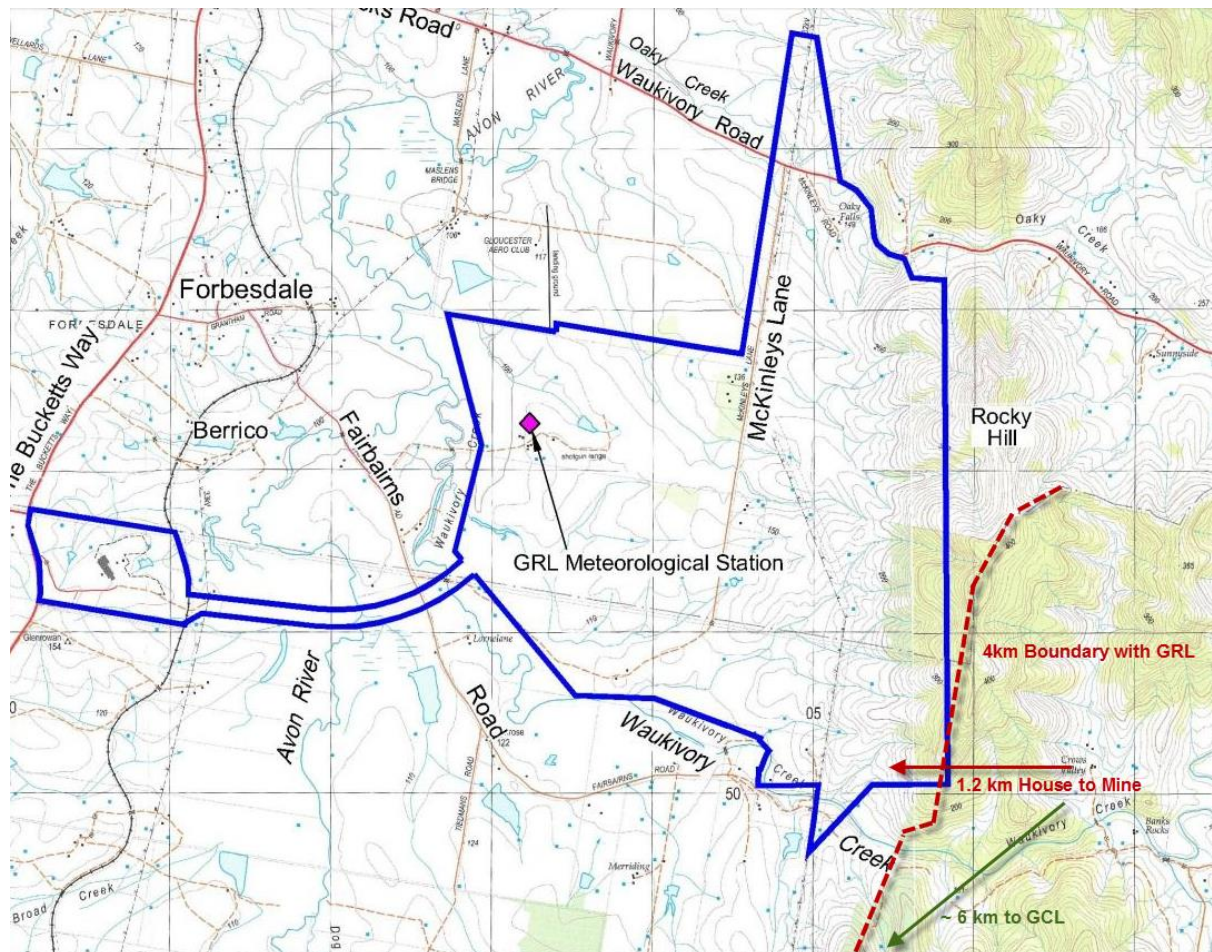


Fig F Land Ownership ES-15 (GRL Executive Summary)

## Noise

My family home is situated 1.2 kms from the mine site.



Partial Fig E Local Setting ES-13 (GRL Executive Summary)

The 35 decibel line excludes our two houses (so called receptors) [see Figure 6.30 below].

Concerns for us:

- Being on the other side of the 35 dBA line is indiscernible to those who are on the greater side of the 35 dBA line and yet we have not claim. Figure 6.30 shows that part of our property is affected by greater than 35 dbA, yet the two houses are under 20 dBA.
- Gloucester Coal (Yancoal) is 7 km from my house (receptor) and we get a disturbing level of noise from mining activities such as heavy vehicle track noise, engine noise, and blast noise from the pits. On one occasion our house shook from a blast.
- Recent drilling exploration on Rocky Hill site was very audible. As geologist I have worked with drilling rigs and can vouch for them being much quieter than mining associated noises.

- As a consequence I have little confidence in the consultants' noise modelling. It is flawed.

Rocky Hill mine site is 1.2 km from my family home (receptor) and it is indicated in the EIS that I won't be affected. This I can't believe.

The specialist noise consultant appears to have skewed modelling data to produce a Decibel contour chart that suits GRL. It seems suspicious that the 35 dBA contour eliminates just about all private residences.

If their modelling is false, then the consultants should also be held accountable as well as the applicant should it be accepted.

The consultants' noise study excludes us from the acquisition rule yet my property value is already reduced.

My family health will also be seriously affected by high frequency and low frequency noise.

The following chart shows the noise contours to which I'll be monitoring and recording. Should these limits prove to be grossly incorrect then I believe it is the company's responsibility to close the mine until something is done about the noise pollution.

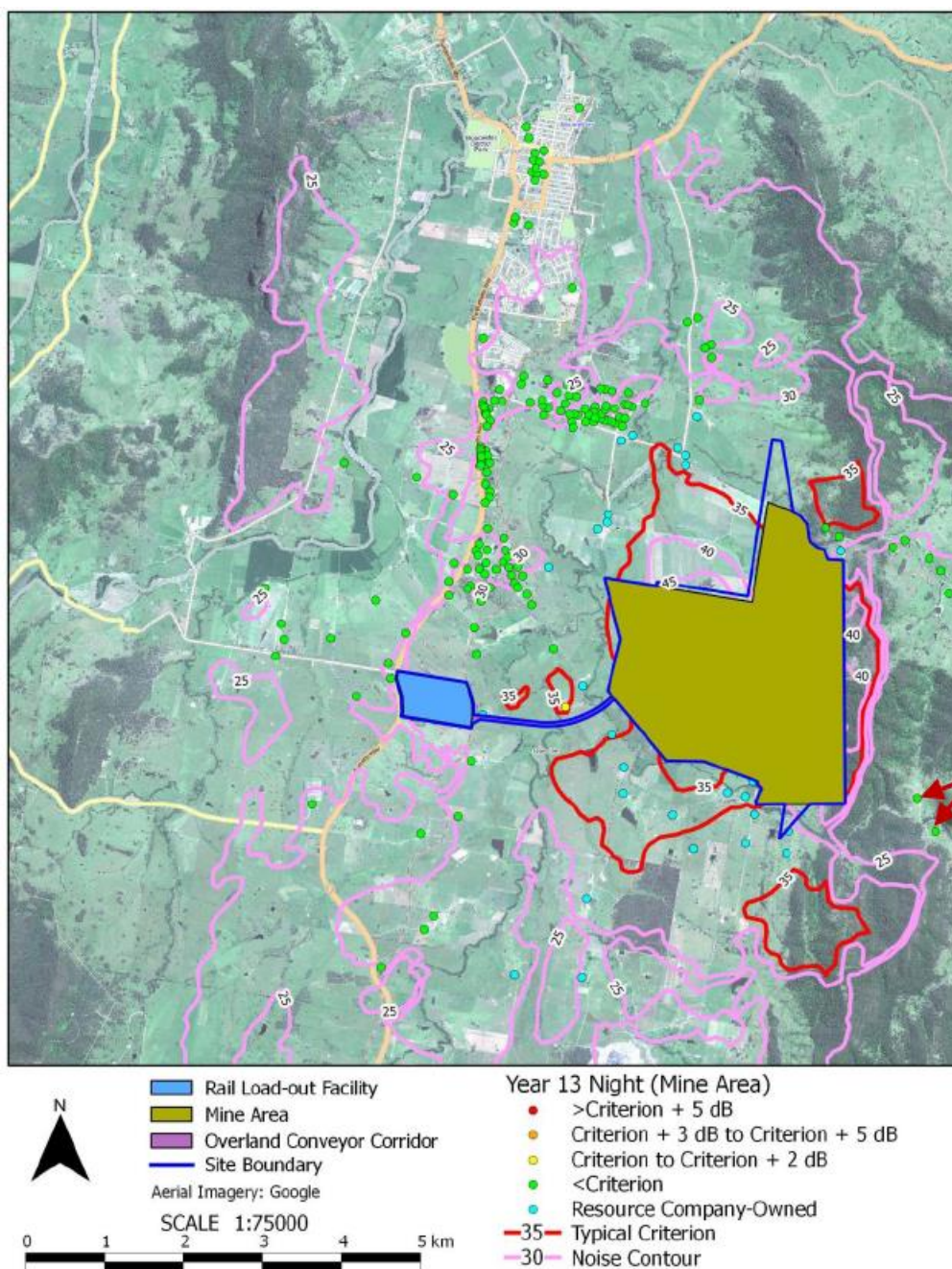
The people in the Waukivory valley are already being affected by Stratford Coal Mine noise, all be it well below the EPA level, it is still very annoying.

There is NO noise or dust monitoring done to the east of the mine site. This should be corrected before any consideration of approval is given.

#### **Our preferred outcomes:**

- **No Mine or**
- **Absolutely NO night work, including rail loading, washery and maintenance. GRL has no social licence to disturb country and town people at night.**
- **Compensation for loss the property value**
- **Compensation for noise inconvenience**
- **Compensation for dust pollution**
- **Inclusions in the acquisition zone**
- **Mine to cease operations if noise exceeds the stated limits. A noise monitoring device installed on our property and regularly checked by myself or an independent representative.**
- **Consultant to be made responsible for their modelling in an attempt to prevent them producing models that favour the mine/client.**





Noise contours have been produced from a single adverse meteorological condition and are indicative of the 10% exceedance level.

**Figure 6.30** Year 13 Night – Predicted 10% Exceedance  $L_{Aeq,15min}$  (dBA)

### **Dust Issue:**

This issue is a very pressing and has huge implications for health. The EIS clearly states that I am not affected by either PM2.5 or PM10 particle dust (see Figure 4.24), which I find difficult to believe. The Stratford extension EIS, which is 6.5 kms to the south west, states that I'll be affected by both particulate matter but it is expected to be below the assessment criteria of 25ug/m3.

A couple of locals have commented on the morning mist that settles around the town which used to be pearly white is now a discoloured brownish colour – no doubt pollution from the current mine containing small and large particle dust. This mine will not just affect my family farm but all the people in the Gloucester area.

Rocky Hill modelling shows that my family home (receptor), which is situated 1.2 km from the GRL Rocky Hill mine site, won't be affected by dust. Given that even small amounts of coal dust contains carcinogenic material, if this is a serious oversight by the consultants' modelling they should be held accountable.

People in the Gloucester township are noticing coal dust in their pool filters, on their roofs and on their cars. Gloucester is 13 kms from Stratford Coal Mine/Yancoal, and according to their dust modelling it is impossible to get coal dust in the Gloucester township.

Dust pollution is not just a human concern, we have noticed calves born on the edge of the Stratford Coal mine area are coughing. Even the cows occasionally cough. This is an observation that could be an indicator of worse things to come. I am a healthy person, and now I suffer every year with various respiratory problems which are hard to clear up. I have many more visits to my GP and often need prescribed medication which I have never needed before.

The following figure 4.21 shows no attempt to monitor dust pollution east of the mine. This will affect a lot of people on small farms who live in this area.

### **Our preferred outcomes:**

- **If the mine is approved, provide at least a temporary dust monitor at my home to demonstrate that the modelling is accurate. And if it is shown that the modelling is flawed – open negotiations for acquisition/compensation.**
- **Organise an independent in-depth health study on the people of Gloucester and surrounds. Health testing should be done on all issues concerning health by noise, dust, light, sleep disorders and stress caused by uncertainty created by the mine.**

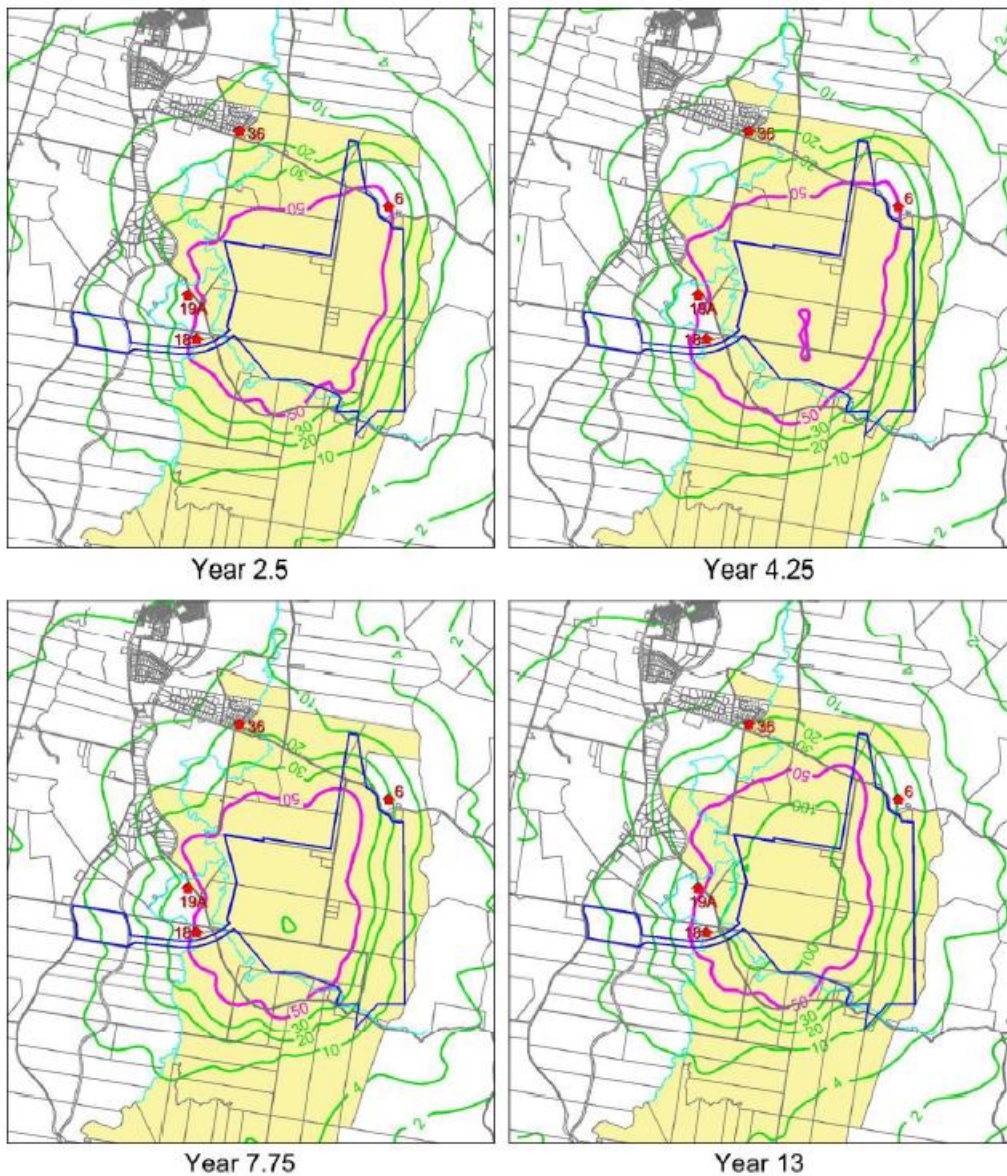


Fig 4.24 Predicted Maximum 24-Hour Average PM10 Concentrations “Proposal-Only”

Above is an example of the Dust modelling that I believe is incorrect. Even the consultant covers themselves with “Proposal-Only”.



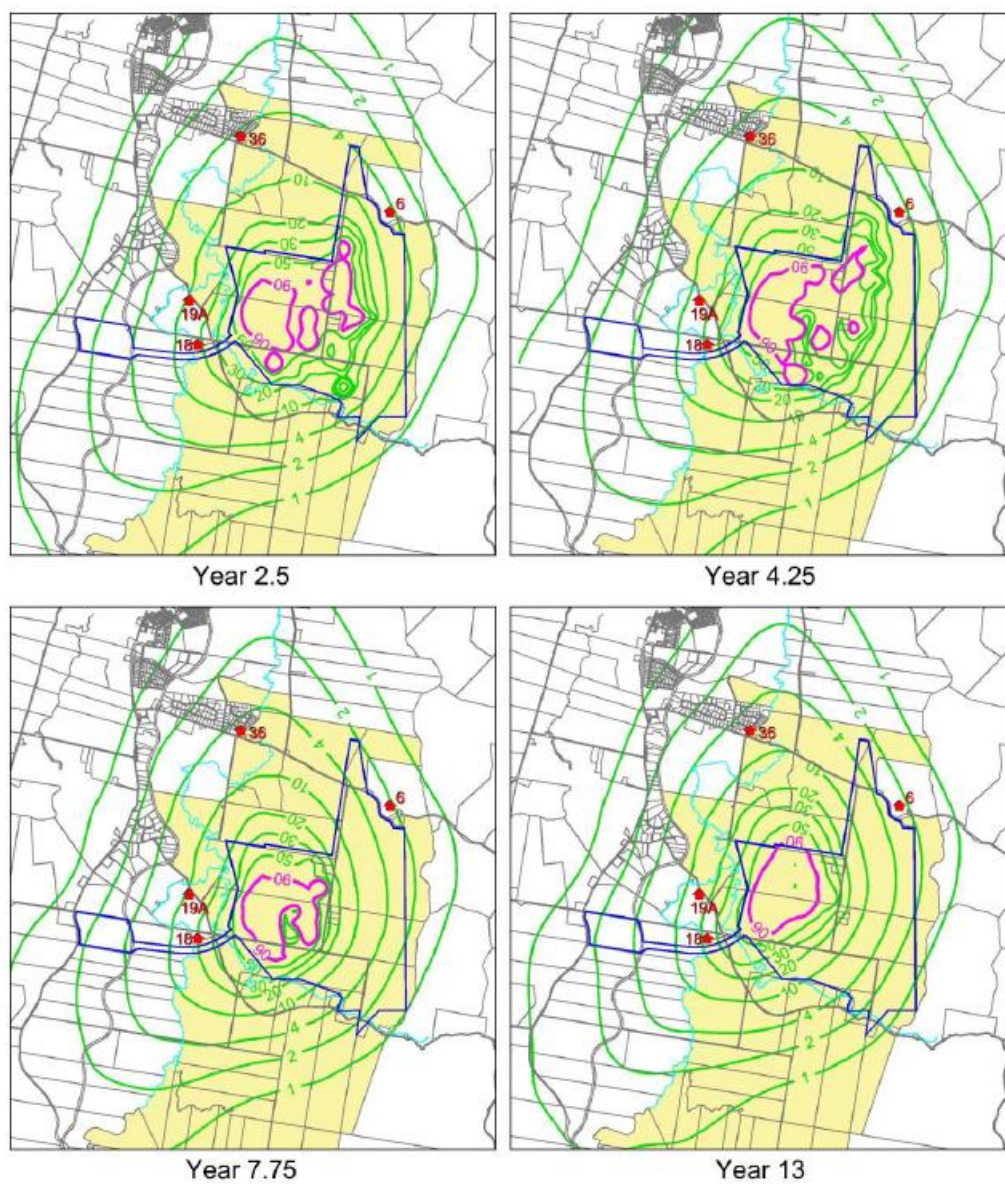


Fig 4.23 Annual TSP Concentrations “Proposal-Only”.

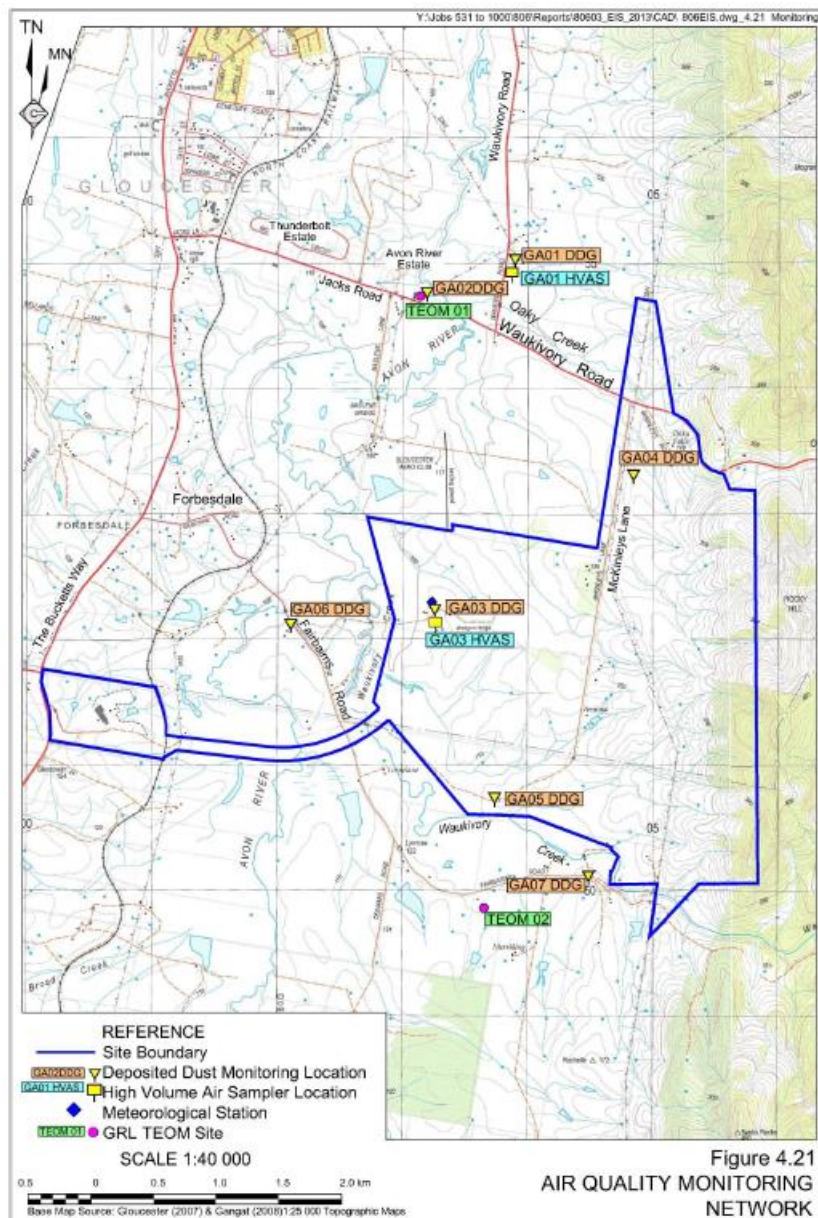


Figure 4.21 showing no data is being collected to the east of the mine site.

### Blasting and Rogue Boulders Issue:

Blasting is a very serious concern. Blasting will be conducted close to basement rock (Alum Mountain Volcanics). Our family home and other farm buildings are constructed on the same basement rock and we are expecting vibration problems as the volcanic rock will transfer waves easier than the sedimentary fractured and faulted rocks.

Huge stand-alone boulders (approximately up to 20m<sup>3</sup>) of rhyolite rest on the rock shelf located on the crest of the hill, Rocky Hill ridge, which runs between the mine site and my family home. With blasting, I am concerned that these great boulders might loosen and

slide towards the mine site or towards my family home. There is evidence of boulders rolling down the Rocky hill. And on the Bucketts about 15-20 years ago, boulders loosened and rolled off the Bucketts creating a massive scar and coming to rest within metres of homes.

**Our preferred outcomes:**

- **Reduce Blasting effects of vibration/air blast noise criteria by modifying the blast technique.**
- **Examine the boulders on the ridge and make safe.**

**Greenhouse Gas Emissions:**

The EIS states there is insignificant effect on climate change to Greenhouse Gas Emissions by the release of fugitive CH<sub>4</sub> during mining .

Gloucester Coal did numerous gas measurements on open drill holes to establish if there was a commercial viability and also the associated danger of escaping gas due to fires etc.

If there is no fugitive gas expelled during mining, then I question what AGL is doing with gas mining drill holes planned in Rocky hills site area.

**Geology and Resource efficiency Issues:**

As the geologist, at the time, who worked on the Stratford Coal project, I am well aware that the Rocky Hill project has low resources, low quality coal and immense structural problems for mining.

This would be the smallest coal mine carrying a highest risk mine proposal in the state and carries a high probability of failure, potentially leaving the Gloucester community a scar in the landscape of our valley for the tax payers to remedy. I question the state significance of this project, comparing it to the Hunter Valley mines. Even the small boutique mines of Stratford/Durallie mines dwarf this proposal.

This mine will destroy our \$30 million per year tourism business and tree changing investors. I am personally disgusted that innocent people are expected to suffer for the greed of mining companies who are increasingly owned by offshore interests.

The Rocky Hill Company openly states that it will mine the best quality coal first to recover costs. Should it then fail and withdraws bankrupt, the remaining coal resources will be sterilised.

**Our preferred outcomes:**

- If granted a mining lease then Rocky Hill should pay royalties on the entire minable resource to cover the state for any sterilised resources.

I contend that the EIS is seriously flawed.

The mine asks for approval based on its EIS and consultants' modelling then its mining lease should be limited to the scope of the report and the proposed modelling. Should a mining lease be granted based on this EIS, Rocky Hill Coal Mine should live by its findings.

In the event of any of the EIS criteria being exceeded, their rights to continue mining should cease immediately.

**I restate my concerns:**

**The issues that affect us are:**

- **Property prices and saleability**
- **Noise**
- **Dust pollution**
- **Blasting pollution and vibration**
- **Geology, resource and rehabilitation**
- **Greenhouse Gas Emissions**

**Anthony and Diana Berecny**