

Ref: D2017/18308

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Dear Mr Stuckey

**Springvale Mine Extension Project Modification (SSD5594 MOD 2)**

Thank you for your email received 23 January 2017 seeking WaterNSW's comments on the Springvale Mine Extension Project Modification 2 (SSD 5594 MOD 2). WaterNSW has reviewed the Statement of Environmental Effects (SEE) prepared by Centennial Coal (dated December 2016).

WaterNSW notes that the Department is also currently assessing the following projects which are related to the Springvale Mine Extension Project (SMEP) Modification 2:

- Springvale Water Treatment Project (SSD 7592) to treat SMEP mine water discharges for reuse at Mount Piper Power Station and cease mine water discharges at LDP009
- Springvale Mine Extension Project Modification 1 to increase coal production, and
- Western Coal Services Project Modification 1 to dispose of sludge generated by the Springvale Water Treatment Project (SWTP) at the reject emplacement area of the Coal Services Site.

**Overall Comments**

WaterNSW is disappointed that there has been a delay in the implementation of measures to achieve the performance measures relating to salinity and toxicity of mine water discharges. In this regard WaterNSW notes that Centennial Coal agreed in July 2015 to meet a 50th percentile of 700, a 90th percentile of 900 and a 100th percentile limit of 1,000 micro-Siemens per centimetre Electrical Conductivity ( $\mu\text{S/cm EC}$ ) limits for salinity at LDP009 by July 2017.

If the modification application is approved the result would be a greater concentration and load of salts entering the catchment downstream of LDP009 (than that currently permitted) with resulting current chronic toxicity continuing until June 2019 (or earlier if an appropriate mitigation measure is implemented). In such circumstances WaterNSW considers Centennial Coal should be required to undertake compensatory water quality and/or catchment improvement measures and suggests the imposition of an appropriate condition for such measures (with a specified monetary value) to be implemented at or within the vicinity of the impacted watercourses and that these measures are implemented by 30 June 2018.

### ***Elimination of Acute Toxicity from LDP009 Discharges***

The SEE states that acute toxicity has been eliminated from LDP009 discharges due to changes to flocculant agent and dosing rates. Therefore there is no need to modify the condition relating to acute toxicity.

### ***Impact of SSD5594 MOD1 on SSD5594 MOD2***

The SEE states that the proposed modification achieves NorBE by meeting the discharge limit for salinity as defined by the DPE 'base case' of 1200  $\mu\text{S}/\text{cm}$  for discharges at LDP009 into Sawyers Swamp Creek, that existed at the time of the original SMEP SSD 5594 application.

WaterNSW notes that the SMEP Mod 1 (SSD 5594 MOD 1) estimated an increase in mine water discharges by 10 L/s or 0.86 ML/day at LDP009 into Sawyers Swamp Creek over that approved in the original application, as a result of the proposed increase in annual coal production to 5.5 Mtpa. WaterNSW considers the SMEP Mod 2 appears to not have considered the mine water discharge increases as a result of SMEP Mod 1. Recent additional sensitivity analyses for SMEP Mod 1 by Jacobs (dated 2 February 2017) show minor deterioration of water quality downstream in the Cocks River catchment as a result of the SMEP Mod 1 compared to the original SMEP. Clarification and justification is required in this regard.

The salinity in Table ES1 of the SEE for Mod 2 and Tables 4.12 and 4.22 (Jacobs December 2016) for 50 and 90%-ile for Lake Wallace (Node#074) and Lake Burragorang (Node#280) for approved case are not the same as in Tables 3.34 and 3.40 (Jacobs 26 March 2015); Table 6 (Jacobs 3 August 2015) and Additional Sensitivity Analyses for SMEP Mod 1 by Jacobs (dated 2 February 2017). Clarification is also required in this regard.

### ***Impact of Springvale Mine Water Treatment Plant (SSD7592) on SSD5594 MOD 2***

WaterNSW notes that a separate proposal is being considered by the Department for the Springvale Water Treatment Plant (SWTP) (SSD 7592). The SEE states that the SWTP will be operational by 30 June 2019. When the SWTP is operational, it will treat mine water to the water quality criteria of 500 $\mu\text{S}/\text{cm}$  (90<sup>th</sup> Percentile) and that this treated water is proposed to be reused at Mount Piper Power Station, any excess water be discharged to Thompsons Creek Reservoir and mine water discharges at LDP009 will cease.

### ***WaterNSW Recommendations***

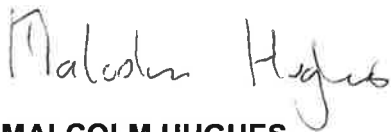
Water NSW recommends that:

1. The SMEP Mod 2 is not determined until the Springvale Water Treatment Plant Project (SSD 7592) is determined and the SWTP should have a condition requiring the Project to be constructed and implemented within 18 months of the approval to ensure current untreated mine water discharges occurring at LDP009 as part of the SMEP proposal ceases as early as possible.
2. If the SWTP become operational before the 30 June 2019, the chronic toxicity criteria in Schedule 4, Condition 12 proposed to be deferred to 30 June 2019 should be met at such time when the Springvale Mine Water Treatment Plant (SSD 7592) becomes operational, whichever occurs first.
3. The proposed amended condition be reworded to:
  - Eliminate acute toxicity from LDP009 discharges to aquatic species by 30 June 2017 and chronic toxicity to aquatic species by 30 June 2019 or such time that the Springvale Mine Water Treatment Plant (SSD 7592) becomes operational (whichever occurs first), with acute toxicity defined as >10% effect relative to the control group and chronic toxicity defined as >20% effect relative to the control group.

4. A condition is included in the consent which requires Centennial Coal to implement an appropriate level of water quality or catchment improvement at or within the vicinity of the watercourse impacted by the ongoing discharge of mine waters by 30 June 2018.

Water NSW would appreciate continuing to be involved in the assessment of this application.

If you wish to discuss this letter or the project more generally please do not hesitate to contact me on 4724 2452.



**MALCOLM HUGHES**  
**Manager Catchment Protection**

2/3/17

