



Your reference :
Our reference : SF14/6738; DOC16/602437-04
Contact : Mr Allan Adams; (02) 6332 7610

Mr Paul Freeman
Team Leader, Resource Assessments
NSW Department of Planning & Environment
GPO Box 39
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13 December 2016

Dear Mr Freeman

I refer to your request by email to the Environment Protection Authority (EPA) on the 28 November 2016 for comments and recommendations on the Western Coal Services SSD 5579 Modification 1 (MOD1).

The modification is to permit the receipt of the "residuals" waste stream from the proposed Springvale Water Treatment Project (SWTP) to be constructed at Mount Piper Power Station (MPPS). The residual waste is proposed to be disposed within the existing Reject Emplacement Area (REA) at the Springvale Coal Services Site (SCCS). Changes to the decommissioning and rehabilitation strategy approved in SSD 5579 are also being sought. The EPA has reviewed the Statement of Environmental Effects (SEE) including the supporting appendices and provides the following comments.

The EPA supports the proposed SWTP at MPPS, and acknowledges the benefits to water quality in the Coxs River Catchment as a result. In addition, the proposed implementation of clean water diversion works at SCCS are predicted to reduce the catchment contributing to the discharge at Licensed Discharge Point 006 (LDP006) is also supported. The diversion of clean water is predicted to reduce the average annual discharge from LDP006 from 848 ML to 441 ML.

However, MOD1 predicts that the annual disposal of 157 ML (approximately 10 KL at a time) of residuals from the SWTP will result in the annual average discharge increasing from 441 ML to 570 ML; while this is a reduction in the current annual average of 848 ML, and this is dependent on the success of the clean water diversion, the disposal of residuals still results in a predicted discharge of 129 ML (with an estimated EC of 2500 $\mu\text{S}/\text{cm}$) annually from LDP006.

As stated above, the EPA welcomes the construction of the SWTP and the beneficial outcomes to water quality. However the EPA does not support the transfer and disposal of SWTP waste in a liquid state to the SCCS - REA that will result in water with an elevated EC (2500 $\mu\text{S}/\text{ccm}$) contributing to an increased daily rate of discharge in the order of 0.3-0.5 ML/day from LDP006. Allowing a discharge of up to 0.5 ML/day of mine water back to the Coxs River (via an increased discharge at LDP6 into Neubecks Creek), is counter to the intent of the SWTP.

The EPA acknowledges that the residuals material will be decanted from the REA and managed in accordance with the current water management practices at SCCS. The EPA requests that options to dewater the residuals on-site at MPPS treatment facility or the SCCS prior to disposal at the REA as a solid waste be considered. Following disposal as a solid waste placement, the material could be managed to restrict influx of rainfall and the subsequent generation of leachate.

In addition, the EPA is seeking clarification on the exact location proposed for disposal of the residuals. Figure 5 of the main report titled '*Springvale Coal Services Site Infrastructure*' shows the Co-disposal REA located near the main entrance on the eastern side of the site. Whereas, Figure 11 of the main report titled '*Residuals Transfer Pipeline at Springvale Coal Services Site*' shows the Residuals Transfer Pipeline terminating at the REA located on the southern boundary of the site.

In the event the project is approved, and a decision is made on the most suitable form to dispose the waste into the REA, the licensee will be required to formally classify the waste as per the EPA guidelines, and apply for a licence variation to permit the receipt of waste from off-site.

Should you have any further enquiries in relation to this matter please contact Mr Allan Adams at the Central West (Bathurst) Office of the EPA by telephoning (02) 6332 7610.

Yours sincerely



DARRYL CLIFT
Head Central West Unit
Environment Protection Authority