

Our Ref: D2016/141219

Paul Freeman
A/Team Leader, Resource Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Freeman

**Western Coal Services Project Modification 1 (SSD 5579)
Review of Statement of Environmental Effects**

I refer to the Statement of Environmental Effects (SEE) for the modification of the Western Coal Services consent SSD 5579. The modification application seeks permission to allow receipt of the residuals from the proposed Springvale Water Treatment Plant project.

WaterNSW has reviewed the SEE and notes that the salt and water balance modelling results predict an adverse environmental impact along Wangcol Creek due to increase in salinity as a result of the proposed residuals material transfer and emplacement at the Springvale Coal Services Site (SCSS). This indicates that the proposed modification would not have a neutral or beneficial effect on water quality in Wangcol Creek.

WaterNSW have the following comments:

- The SEE states that the increased EC is primarily due to increased salt load on Cooks Dam (EC within Cooks Dam - median 3273 $\mu\text{S}/\text{cm}$ and can be as high as 4460 $\mu\text{S}/\text{cm}$) which is higher than the assumed of 2500 $\mu\text{S}/\text{cm}$ for residuals material stream. WaterNSW notes that water from the Rejects Emplacement Area is pumped to Cooks Dam (see Vol. 1, Page 29, Section 3.3.9.3). WaterNSW considers that this may be the reason for high salinity and water levels in Cooks Dam and appropriate mitigation measures should be adopted to rectify this issue.
- Appendix D, Page 39, Section 5.1.1 and Figure 5-3 states discharges from LDP006 range from 0-14 ML/day. While salinity loads for average annual discharges have been estimated, salinity loads and consequences for higher end of discharges are not estimated. WaterNSW considers these should be estimated and impacts on Wangcol Creek assessed.
- Clarification is required on the timeframe when the clean water diversions at the SCSS would be installed, monitoring completed and salt and water modelling results validated for future conditions. WaterNSW requests that the modelling validation results be provided to agencies.

WaterNSW requests the opportunity to continue to be involved in any ongoing assessment of the Project. Further queries about our comments can be directed to Girja Sharma on 47242459.

Yours sincerely



MALCOLM HUGHES
Manager Catchment Protection

CC: Darryl Cliff - EPA

16/12/16