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Department of Planning and Environment  
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SYDNEY NSW 2001

Attention: Lauren Evans  
By email: [lauren.evans@planning.nsw.gov.au](mailto:lauren.evans@planning.nsw.gov.au)

1 February 2019

Dear Ms Evans

**Mount Owen Continued Operations Project - Modification 2 (SSD 5850 MOD 2)  
Response to Submissions**

I refer to your email to the Environment Protection Authority (EPA) dated 7 January 2019 inviting the EPA to comment on the "Mount Owen Continued Operations Project Modification 2 Response to Submissions" (the RTS) prepared by Umwelt for Glencore and dated December 2018.

The EPA provided a submission to the Department of Planning and Environment ("DPE") about the proposed modification, dated 5 September 2018. The EPA requested more information with respect to:

- Air Quality;
- Noise Compliance Methods;
- Water Quality and management;
- Waste management; and
- Groundwater monitoring.

The EPA has reviewed the RTS and found that the information provided does not satisfy some aspects of the EPA's request for additional information. The EPA will be unable to recommend conditions of approval until the information listed below is provided:

**Air Quality**

The EPA requested a revised assessment that:

1. quantifies  $PM_{2.5}$  emission from diesel plant and equipment proposed for use by the development; and
2. includes additional information (tabulated results and updated conclusions), identifying all receptors (private and mine owned) that are predicted to exceed the EPA's impact assessment criteria ( $PM_{2.5}$ ,  $PM_{10}$ , TSP and dust deposition).

Estimation of diesel particle emissions - Appendix 1 of the RTS includes an estimate of PM<sub>10</sub> and PM<sub>2.5</sub> emissions from diesel engines based on emission factors from the EPA's 2008 Air Emission Inventory, and fuel consumption data for years 2, 8, and 10. The additional information adequately addresses this issue and the EPA would be able to recommend conditions related to this issue once other matters are resolved.

Additional Exceedances of Impact Assessment Criteria - Appendix 1 of the RTS includes updated conclusions of the air quality assessment based on comparisons of predicted ground level concentrations with the EPA's impact assessment criteria contained in the *Approved Methods for Modelling and Assessment of Air Pollutants in NSW*. Additional conclusions provided in the additional information are:

- Excluding community infrastructure or private infrastructure, or properties subject to existing acquisition rights, there are no private sensitive receptors which are predicted to experience 24-hour or annual average PM<sub>2.5</sub>, annual average TSP or annual average dust deposition levels above the EPA impact assessment criteria;
- PM<sub>10</sub> (24 hour) average cumulative concentrations are predicted to exceed the EPA's impact assessment criterion at 48 private sensitive receptors without acquisition rights. Further, the predicted exceedances at 21 of these receptors could be attributable to the proposed modification. This is based on a comparison of the predicted cumulative ground level concentrations for various mines in the areas (excluding Mt Owen) as compared with predicted ground level concentrations for all sources assessed (including Mt Owen). Between, 1 to 3 additional exceedance days are predicted for these receptors.

The predicted PM<sub>10</sub> contributions from the Mt Owen operations account for between 2 and 22 % of the predicted cumulative 24-hour PM<sub>10</sub> ground level concentration, where additional exceedance days are predicted.

The RTS contains little information on the proposed measures to manage the predicted additional exceedances other than advising that revisions to the Air Quality Management Plan would be undertaken. The RTS advises that the modelling does not include reactive management measures that can be undertaken by Mount Owen.

Information Required – Prior to project determination, the proponent should provide further information to demonstrate that additional measures can be implemented to address all additional exceedances of the PM<sub>10</sub> (24-hour) criterion.

### **Noise Compliance Methods**

The EPA requested a revised assessment that detailed a noise compliance methodology capable of separating noise generated from Mount Owen mine from adjacent sources.

The RTS outlines general principles for determining compliance with noise conditions, however it relies on 'professional judgement' and therefore lacks certainty and transparency.

Information Required - Prior to project determination, the proponent should provide a noise compliance assessment methodology that can be used to isolate/separate the noise contribution generated from the Mount Owen mine from adjacent mining operations. The methodology should incorporate, but need not be limited to:

- attended monitoring at locations representing noise sensitive receivers;
- a clear, unambiguous procedure for determining when Mount Owen is to be accountable for any exceedance of the performance criteria at noise sensitive receivers;
- an array of real-time directional noise monitors designed to differentiate between noise generated on premises that hold separate Environment Protection Licences; and
- a noise model to assist in differentiating between noise generated on premises that hold separate Environment Protection Licences.

## **Water Quality and Management**

The EPA requested a comprehensive assessment of potential water quality impacts on receiving waters from proposed discharges from sedimentation dams.

The RTS does not provide a comprehensive water quality impact analysis, but instead notes that runoff entering sediment dams is from disturbed areas that have not been in contact with coal.

Although the additional information does not adequately address this issue, the EPA would be able to recommend conditions related to this issue once other matters are resolved. No further information is required regarding water quality.

## **Waste management**

The EPA requested details of proposed tailings disposal.

Section 6.14.1.2 of the RTS indicates that the proposed modification will only marginally increase tailings volumes and that sufficient capacity exists for tailings disposal.

The EPA is satisfied with the proponent's response regarding tailings disposal. The EPA would be able to recommend conditions related to this issue once other matters are resolved. No further information is required regarding waste management.

## **Groundwater monitoring**

The EPA requested details of groundwater monitoring associated with the proposed modification.

Section 6.2.1.2 of the RTS provides the requested information.

The EPA is satisfied with the response from the proponent. Current consent conditions appropriately deal with the proposed modification. No further information is required regarding groundwater monitoring.

If you require any further information regarding this matter please contact me Bill George on 4908 6821 or by email to [hunter.region@epa.nsw.gov.au](mailto:hunter.region@epa.nsw.gov.au).

Yours sincerely

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