

WCPL Responses to the DECCW Submission

Item	Summary of Issue	Response
1	Concerns were raised regarding the nature and timing of construction activities and the consideration of evening and night-time construction noise.	<ul style="list-style-type: none"> It should be noted that the construction activities would be undertaken at the CHPP and materials handling area (near the centre of the mine site). The nearest private receivers would be located approximately 5 km from the construction activities. As stated in the EA, the majority of construction works would be undertaken during the daytime and the use of significant noise generating construction equipment (e.g. large cranes, dozers, concrete trucks etc) would be generally limited to daytime hours. The operation of construction heavy equipment was therefore included in the daytime 2011 scenario in the Noise Impact Assessment. Evening and night-time construction works at the CHPP area would include the use of light equipment (e.g. local lighting, light vehicles, elevated work platforms) as required (e.g. for electrical and mechanical installation night works). In the context of the existing 24hr mining operation and the distance to the nearest private receivers, the use of some light equipment during the evening and night-time periods during upgrade construction works would be inconsequential and does not warrant specific noise modelling.
2	<p>Concerns were raised over predicted traffic noise increases along Ulan Road, whether cumulative impacts were considered and the potential impacts of construction traffic noise on private residences on Ulan Road south of Cooks Gap.</p> <p>DECCW requested the absolute level of traffic noise that exceeds the relevant criteria under the ECRTN be provided.</p>	<ul style="list-style-type: none"> As stated in the EA, operational employee traffic and traffic associated with deliveries would be only modestly increased by the Modification. However, a short-term peak in additional traffic is expected in 2011 during construction and potential traffic noise levels on Ulan-Wollar Road (west of Wilpinjong) and Ulan Road (north of Cooks Gap to Ulan-Wollar Road) were reviewed. Potential cumulative traffic associated with Moolarben Coal Mines Stage 2 and Ulan Coal Mine Continued Operations Project in 2011 were included in the traffic noise assessment (refer Tables 20, 21 and 22 of the Noise Impact Assessment). Traffic flows on Ulan Road increase with proximity to Mudgee. Previous traffic counts reported in the Wilpinjong Coal Project EIS indicated significant increases in traffic with increasing proximity to Mudgee (i.e. 790 movements south of Ulan, 1,321 movements north of Wollar Road and 3,482 movements north of Henry Lawson Drive). Recent traffic counts completed for the Modification confirm that daily movements on Ulan Road increase markedly with proximity to Mudgee (i.e. 1,841 north of Cooks Gap and 6,624 south of Henry Lawson Drive). The relative contribution of Wilpinjong Coal Mine traffic to total daily vehicle movements on Ulan Road therefore falls significantly with increasing proximity to Mudgee. The road noise assessment focuses on the section of Ulan Road north of Cooks Gap, as this is the section of Ulan Road where relative contributions of the Wilpinjong Coal Mine to total traffic volumes is higher. The potential increase in traffic noise from Modification construction related traffic on this section of Ulan road has been determined (refer Section 8.3 of the Noise Impact Assessment – Appendix A to the EA) <u>and is less than 2dBA</u>. It follows that detailed assessment of traffic noise on Ulan Road south of Cooks Gap is therefore not warranted for the Modification. DECCW has requested cumulative absolute traffic noise levels that exceed the relevant ECRTN criteria. The table below indicates the estimated number of private receivers that are predicted to exceed applicable ECRTN criteria due to cumulative traffic (i.e. including predicted increased Wilpinjong, Ulan and Moolarben mine traffic) in 2011 on Ulan Road, north of Cooks Gap.

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2 (Cont.)		<table><tr><th rowspan="2">Distance from Ulan Road</th><th rowspan="2">Estimated Number of Private Receivers</th><th rowspan="2">Criteria (night-time/daytime) (dBA)</th><th colspan="2">LAeq(1 hour) (dBA) Predicted Cumulative Traffic (2011)</th></tr><tr><th>Night-time</th><th>Daytime</th></tr><tr><td>20 m</td><td>1</td><td rowspan="8">55/60</td><td>69</td><td>67</td></tr><tr><td>30 m</td><td>1</td><td>67</td><td>65</td></tr><tr><td>40 m</td><td>1</td><td>65</td><td>63</td></tr><tr><td>50 m</td><td>1</td><td>63</td><td>61</td></tr><tr><td>80 m</td><td>1</td><td>60</td><td>58</td></tr><tr><td>100 m</td><td>4</td><td>59</td><td>57</td></tr><tr><td>140 m</td><td>8</td><td>56</td><td>54</td></tr><tr><td>160 m</td><td>1</td><td>56</td><td>54</td></tr></table> <p>Source: After Heggies (2010)</p> <ul style="list-style-type: none">It should be noted that there are no private residences on Ulan-Wollar Road to the west of the mine (refer Figure 4A of the Environmental Assessment).	Distance from Ulan Road	Estimated Number of Private Receivers	Criteria (night-time/daytime) (dBA)	LAeq(1 hour) (dBA) Predicted Cumulative Traffic (2011)		Night-time	Daytime	20 m	1	55/60	69	67	30 m	1	67	65	40 m	1	65	63	50 m	1	63	61	80 m	1	60	58	100 m	4	59	57	140 m	8	56	54	160 m	1	56	54
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3	Concerns regarding the noise modelling scenario in respect to both construction and operational activities occurring in Year 11.	<ul style="list-style-type: none">Three scenarios were modelled for the Modification – viz. 2011, 2014 and 2017/20 combined.The Year 2011 scenario was adopted to capture both operational and construction activities, as described in Section 6.1 of the Noise Impact Assessment:<p>Year 2011 Operations and CHPP Construction</p><p><i>Representative of approximately 13.5 Mtpa ROM coal production rate coinciding with mining in two areas of central Pit 5, together with operations of waste rock mining and emplacement in Pit 1. Construction of the CHPP and materials handling upgrades.</i></p>The 2011 scenario also represents the period before the introduction of any noise attenuated mobile plant items. With the inclusion of the construction activities associated with the CHPP and materials handling upgrades, 2011 represents a typical near term “worst case” scenario.The Year 2014 scenario covers both the predicted peak ROM coal and waste rock production year - and the period with peak on-site mobile equipment use (i.e. haul trucks).Both the 2014 scenario and the combined worst case 2017/2020 scenario model potential operational noise impacts when the mining activities would be occurring in Pit 3, and therefore in closest proximity to private receivers. These scenarios include the operation of the upgraded CHPP and materials handling systems.																																								

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4	DECCW observed that two properties (45 - JAW Smith and 49 - R & L Harkin) are predicted in the EA to fall into the noise affectation zone, and DECCW advises that these properties should be managed accordingly in the Project Approval.	<ul style="list-style-type: none"> Property 49 (R & L Harkin) has recently been purchased by WCPL and is no longer privately owned. WCPL supports the continued inclusion of property 45 (JAW Smith) in the Project Approval as being subject to acquisition by WCPL upon request.
	DECCW observed that the 'acquisition upon request', 'land acquisition criteria' and 'additional noise mitigation measures' provisions in the existing Project Approval could remain unchanged by the Modification.	<ul style="list-style-type: none"> The 'acquisition upon request' provisions in Schedule 3, Condition 1 of the Project Approval would need to be amended to remove one private landowner (5-Power) from Table 1 as this property is no longer privately owned. WCPL concurs with DECCW that the 'land acquisition criteria' provided in Schedule 3, Condition 3 and 'additional noise mitigation measures' provisions in Schedule 3, Condition 6 of the Project Approval would not require revision.
	DECCW queried whether the Reid property (60A/60B) and Bailey property (51) have been purchased by WCPL as they have specific noise limits in the Environment Protection Licence and are not identified as being affected private residences in the EA.	<ul style="list-style-type: none"> The Reid property (60A/60B) has recently been purchased by WCPL. The initial Project Approval for Wilpinjong Coal Mine included Bailey (51) as a private residence in Schedule 3, Condition 2 - Table 2. However, the private residence in question was later found to be located immediately to the north on the adjoining Maher property (58). The Project Approval was revised to correct this administrative error (refer Attachment 1 to the Modification EA, Schedule 3, Condition 2, Table 2 which does not include Bailey [51] and does include Maher [58]). The Environment Protection Licence should be amended to be consistent with the Project Approval.
5	Concerns were raised regarding the potential for cumulative industrial noise from Moolarben and Wilpinjong at private properties to the south-west, on the far side of the Munghorn Gap Nature Reserve.	<ul style="list-style-type: none"> As stated in the Noise Impact Assessment: <i>The nearest private residences which could potentially receive cumulative noise emissions from the WCM and the Moolarben Coal Mines are on the far side of the Munghorn Gap Nature Reserve and are located approximately 4 to 5 km to the southwest of the WCM (i.e. Residences 68A, 68B, 69, 70A and 70B).</i> ... <i>The most stringent acceptable cumulative LAeq noise amenity level is 40 dBA at the receivers surrounding the WCM. The corresponding WCM project specific LAeq noise amenity criterion is 32 dBA.</i> ... <i>The WCM noise amenity emission level at these residences is less than 32 dBA...</i> The above assessment indicates that Wilpinjong Coal Mine operations are not predicted to contribute to any potential exceedances of the cumulative amenity criteria at these residences. Cumulative amenity noise levels at these private residences are therefore expected to be controlled by the progression of the Moolarben Coal Project.

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6	The DECCW request WCPL to acquire real time continuous 'direct measurement of temperature lapse rate' capabilities generally consistent with the NSW INP, and to prepare a proposal, for approval by the Department of Planning (DoP).	<ul style="list-style-type: none"> • WCPL generally supports this suggestion by the DECCW on the basis that the approved noise limits are linked to the magnitude of the vertical temperature gradient (currently consented at 3 degrees Celsius per 100 metres). • However, in the event that the approved noise limits are linked to atmospheric stability class, then the stability class can be determined from the existing on-site automatic weather station.
7	DECCW made comment regarding a potential to change the notes under Schedule 3, Condition2, Table 2 of the Project Approval to the effect of: <i>"noise monitoring and the applicability of the noise limits are to be in accordance with the INP"</i>	<ul style="list-style-type: none"> • WCPL supports the determination of Project Approval noise criteria applying under various weather conditions in accordance with the Industrial Noise Policy. • The following "note" has appeared recently (May 2010) in the Bulga Open Cut Pit (DA-41-03-99) Notice of Modification, which is generally acceptable to WCPL: <i>Noise generated by the development is to be measured and evaluated in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.</i>
8	A concern was raised that 24 hour PM ₁₀ has not been included in the Air Quality Impact Assessment.	<ul style="list-style-type: none"> • 24 hour PM₁₀ monitoring results are presented in Table 4.3, Table B.1 and Table B.2 and summarised in Section 4.3.2 (PM₁₀ Concentrations) of the Air Quality Impact Assessment. • 24 hour PM₁₀ predictions for Wilpinjong Coal Mine incorporating the Modification are presented in Table 7.3, Figure 7.13, Figure 7.14, Figure 7.15, Table 7.4, Figure 7.16 and Table 7.5 and the predictions are discussed in Section 7.3.2 (24-hour average PM₁₀ concentrations) in the Air Quality Impact Assessment.
	The DECCW concurs with the installation of an additional TEOM to the west of the Mine as indicated on Page 48 of AQIA and the development and implementation of a real time trigger and response protocol. The use of such a protocol, combined with a regional air quality monitoring network is considered by DECCW to be essential to the management of dust impacts.	<ul style="list-style-type: none"> • WCPL concurs with the DECCW's statement regarding the installation of an additional TEOM and operation of a real-time trigger and response system. WCPL is currently trialling such a system for inclusion in a future amendment of the AQMP.
9	DECCW advised that the Spontaneous Combustion Management Plan is to be revised to address spontaneous combustion issues, and that the DoP should consider including appropriate conditions in the Project Approval.	<ul style="list-style-type: none"> • The issue of spontaneous combustion does not relate specifically to the proposed Modification as the extent of mining would be unchanged and outbreaks to date have been primarily associated with material in temporary waste emplacements. • Notwithstanding, WCPL will work in consultation with the DECCW and DoP to improve the management of spontaneous combustion at the Wilpinjong Coal Mine.