

Ms Gwen Wilson
General Manager – Safety Health Environment Community
Broken Hill Operations Pty Ltd - Rasp Mine
PO Box 5073
BROKEN HILL NSW 2880
Via email: gwenwilson@cbhresources.com.au

Dear Ms Wilson

**Rasp Zinc Lead-Silver Project (07_0018)
Proposed Modification (MOD 6)**

I refer to your correspondence dated 18 September 2020 and the 'Project Brief – Kintore Pit TSF3', dated September 2020 regarding changes to the scope of the proposed modification (MOD 6) to the Rasp Zinc-Lead-Silver Project Approval (07_0018). MOD 6 now involves:

- use the Kintore Pit as a new tailing storage facility (TSF3) for naturally dried tailings;
- co-disposal of excess waste rock from underground with tailing in Kintore Pit (TSF3);
- relocate the current mine portal and access decline with associated infrastructure to a new boxcut;
- harvest naturally dried tailings from the Blackwood Pit (TSF2) and transfer into TSF3;
- conduct periodic crushing of non-ore material in the Kintore Pit and/or BHP Pit;
- use waste rock for rehabilitation capping; and
- change administrative requirements for annual reporting and noise criteria.

Based on the information provided, the Department confirms that the proposed activities can be characterised as a modification to the existing approval and can be assessed and determined under Section 4.55(2) of the *Environmental Planning and Assessment Act 1979*.

In preparing the Modification Report, you must continue your consultation with the Environment Protection Authority (EPA) to confirm that the proposal meets the requirements of the relevant policies and guidelines, particularly in relation to noise, dust and waste disposal.

Additionally, the Department requires you to consult with the Mining, Exploration & Geoscience, Dams Safety NSW, NSW Health, Department's Resources Regulator and Water Group, and Broken Hill City Council.

The Department has consulted with the key agencies and will not be issuing formal Environmental Assessment Requirements for the proposed modification. In addition to any issues identified in your Project Brief paper dated September 2020, and that may be raised in consultation with key agencies once the Modification Report is lodged, **Attachment 1** provides specific advice on key areas of consideration by the Department for assessment of MOD 6.

If you wish to discuss this matter further, please contact Mandana Mazaheri on (02) 9995 5093.

Yours sincerely



19/10/2020

Stephen O'Donoghue
Director
Resource Assessments
as nominee of the Planning Secretary

ATTACHMENT 1 KEY ISSUES FOR CONSIDERATION

MINE PLAN

- Include a strong justification and consideration of alternatives, in relation to all aspects of the proposed modification, including the:
 - need to use Kintore Pit as a new tailing facility storage (TSF3) and co-disposal of excess waste rock from underground with tailing in Kintore Pit and reasons why the approved TSF1 and TSF2 are not the preferred options for tailings storage;
 - proposed design of the TSF3 embankments, retaining wall, water leakage/permeability and safety issues;
 - proposed design of the tailings dewatering system and infrastructure;
 - proposed design for relocation of the current mine portal, access decline and the new boxcut;
 - proposed design and location of future excess waste rock emplacement areas in consideration of potential lead content and management of higher lead generating exposed areas on the site; and
 - proposed hours, timeframe and sequence of proposed works.
- Include a detailed revised materials balance accounting for the storage of tailings and waste rock for the life of the mine, including consideration of the current waste rock volumes in the pit and justification for future mine waste rock volumes.

AIR QUALITY

- Include a detailed air quality impact assessment and description of on-site dust mitigation and management measures that would be used to prevent exceedances of the air quality criteria, accounting for the cumulative impacts from both Rasp and Perilya Mine operations.
- The measures proposed and presented in the Modification Report must be developed in consultation with the EPA.

NOISE and VIBRATION

- Include a detailed noise and vibration impact assessment and description of management measures that would be used to prevent exceedances of noise and vibration criteria in accordance with the EPA's *Noise Policy for Industry* and *Interim Construction Noise Guideline*, accounting for the cumulative impacts from both Rasp and Perilya Mine operations.
- The measures proposed and presented in the Modification Report must be developed in consultation with the EPA.

HEALTH

- Include a human health risk assessment, in accordance with the *Environmental Health Risk Assessment: Guidelines for assessing human health risks from environmental hazards* (enHealth, 2012).
- Include an update of the current activities being implemented to minimise the existing impact of lead exposure in the community, as per Conditions 12, 13 and 14 of Schedule 3 of the current approval.
- The Modification Report must demonstrate that the proposed modification would not increase the potential for lead exposure or increase blood lead levels in the community.

WATER

- Include detailed assessment and measures to prevent water seepage, permeability and safety risks.
- Include details of changes to the surface management system and identification of the modifications required to the mine soil and water management plan (if applicable).
- Include details of raw water supply and use, including existing raw water consumption and proposed consumption associated with the modification. Provide details about the improvements in water use and consumption that have reduced raw water usage to date.

REHABILITATION

- Include details of the revised rehabilitation strategy, proposed final landform and post-closure maintenance, specifically in relation to the proposed modification, and any requirements of the Broken Hill Rehabilitation Steering Committee.
- The measures proposed and presented in the Modification Report must be developed in consultation with the Department's Division of Resources and Geoscience and the Resources Regulator.

GENERAL

- Ensure that project scheduling is clearly defined in the Modification Report, providing scheduling details of proposed construction activities and materials movement.
- The Modification Report for the proposed modification must account for all the potential cumulative impacts, including from the Perilya Mine operations and if construction activities are expected to overlap with the other proposed activities.
- Adequate justification will be required to justify the level of assessment undertaken for minor environmental impacts.
- Identify any proposed changes to the Environment Protection Licence requirements.
- Evidence of consultation with the local community as well as the relevant agencies about the proposed modification must be provided and documented in the Modification Report.
- As the Modification Report is a standalone document, rather than state that impacts were assessed in the original Environmental Impact Assessment (EIS) and reference this document, sufficient detail from the original project EIS must be included in the Modification Report to describe overall project impacts.