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Via Major Projects Planning Portal

EPA Advice on Submissions Report

Dear Emily

Thank you for the request (PA-32897282) for a review by the NSW Environment Protection Authority (EPA) of the Submissions Report (SR) for a proposed modification to the Project Approval (PA 07_0018 - Mod 6) for the Rasp mine at Broken Hill.

The EPA has reviewed the following document:

- Submissions Report – Kintore Pit TSF3 – December 2021

The EPA understand the proposal is:

- To establish the Kintore Pit as TSF3 for dried tailings co-placed with waste rock.
- Relocate the mine portal access decline.
- Harvest TSF2 tailings for transfer to TSF3.
- Periodic crushing of non-ore material in the Kintore or BHP pits.
- Use waste rock for rehabilitation capping.

Based on the information provided, the proposal is subject to an environment protection licence under Schedule 1 of the *Protection of the Environment Operations Act 1997* for 'mining for minerals' and 'crushing, grinding and separating'.

The EPA has reviewed the SR and notes it has not addressed all the matters in the EPA's submission on the Modification Report dated 20 September 2021.

Matter to be addressed with conditions

The SR notes that the EPA has recommended a 500ktpa extraction and processing limit and that the existing Project Approval has a 750ktpa limit for the premises. The SR responds by advising that proponent did not seek to change the approved 750ktpa limit with this modification.

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The Air Quality Impact Assessment (AQIA - dated 26 May 2021 prepared by ERM Australia Pacific Pty Ltd) that supports Mod 6 assumes a maximum extraction and processing limit of 500ktpa in its assessment. The EPA cannot support the modification without addressing this issue and requiring a revised AQIA assuming a 750ktpa processing limit or requesting a reduction in the approved processing limit.

Alternatively a compromise can be reached where a 500ktpa processing limit is imposed for Mod 6 until a revised AQIA is submitted with a higher assumed processing limit (whether 750ktpa or another figure between 500ktpa and 750ktpa.) The EPA notes in discussions with the proponent that it is unlikely the 500ktpa processing limit will be exceeded, hence the smaller assumed limit in the AQIA.

The EPA recommends the processing limit condition in any modified development consent is:

1. No more than 500 thousand tonnes per annum (500 ktpa) of ore can be extracted and processed at the site.

or

2. No more than 500 thousand tonnes per annum (500 ktpa) of ore can be extracted and processed at the premises.

Note: Where a revised Air Quality Impact Assessment is submitted and that assumes a higher extraction and processing limit and demonstrates compliance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (EPA, 2016) and any regulatory air quality limits associated with the development's activities, that higher assumed figure can be adopted as the approved extraction and processing limit.

If you have any further enquiries about this matter please contact me by telephoning 02 6969 0705 or by electronic mail at riverina.farwest@epa.nsw.gov.au.

Yours sincerely



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