



# THE UNITED MINeworkers' FEDERATION OF AUSTRALIA

(Division of the Construction, Forestry, Mining and Energy Union)  
(Incorporating the Federal & State Registered Unions)

## Northern District Branch

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16 December 2011

The Planner  
Department of Planning  
GPO Box 39  
**SYDNEY NSW 2001**

Email: [plan\\_comment@planning.nsw.gov.au](mailto:plan_comment@planning.nsw.gov.au)

Dear Sir

**RE: REVIEW OF ENVIRONMENTAL ASSESSMENT – INTEGRA MINING COMPLEX, OPEN CUT &  
UNDERGROUND PROJECTS MODIFICATION 1 (DA 08-0101 MOD 1)**

Please find attached the CFMEU Northern District Branch's Submission in relation to the abovementioned project.

The Union welcomes the opportunity to comment on the Integra Mining Complex, Opencut and Underground Projects Modification (DA 08-0101 MOD 1).

Should you have any questions concerning the same, please do not hesitate to contact the Union Office.

Yours sincerely

**KEENON ENDACOTT  
INDUSTRIAL RESEARCH OFFICER**



**Mining and Energy** Division

# Review of Environmental Assessment

## Integra Mining Complex Open Cut & Underground Projects Modification 1 DA 08-0101 MOD 1

### Submission

Construction Forestry Mining and Energy  
Union (Mining and Energy Division)  
Northern District Branch

December 2011

On 15 November 2011 Integra Coal Operations Pty Ltd applied to the Minister, Department of Planning, seeking approval for the extension of approved emplacement area and increasing the dump heights to 141m AHD.

The Director General made the Environmental Assessment publicly available on the 7 December 2011 at the DoP Information Centre Sydney and Singleton Shire Council.

The Union is pleased to take the opportunity to comment on the Integra emplacement project and related activities Environmental Assessment.

The Mining and Energy Division is a Division of the CFMEU under the Federal Workplace Relations Act 1996, with over 120,000 members, one of the largest in Australia. The Division covers several industries including the coal industry, coal ports, metalliferous mining industries, electrical power generation, oil and gas and the Nation's small coking industry.

The Northern District Branch of the CFMEU Mining and Energy Division, being the branch that on behalf of the organisation which is making the submission is the principal Union representing coal miners in the Northern District coalfields of New South Wales. The Integra facility is located approximately 10 kilometres north-west of Singleton is wholly within the State's Northern District coalfields.

The Union is familiar with the Integra facility site and has engaged the services of an Environmental Consultant with extensive experience in local government and environmental assessments on coal mining related projects.

After reviewing all the material and taking advice, the Union supports the extension of the emplacement area Project as proposed and ask the medication to the consent requested be granted

## **Project Overview**

A recent preliminary study was undertaken by the proponent to reassess the waste rock emplacement requirements for the North Open Cut (NOC). The study identified insufficient

dump space by December 2011 and then again in 2015. Without resolution, the proponent indicates there being a significant impact on the development of the pit, and ultimately cause mine operations to cease.

Integra has developed a short-term dumping strategy, occurring over three stages. Stage 1 and some components of Stage 2 are generally in accordance with the current NOC emplacement strategy and comply with the project approvals and therefore, do not require further approval. This proposed modification seeks approval for the components of Stage 2 which vary from the current approved NOC emplacement strategy.

Stage 2 activities which are in accordance with the approved emplacement strategy comprise:

- The rehabilitation of Area 3, which is within the approved NOC emplacement and is approximately 16.5ha in size; and
- Emplacement within approved areas as they become available, including in-pit emplacement within an area of approximately 5 ha in the north-eastern corner of the NOC pit shell.

Stage 2 activities which require modification to the approved emplacement strategy comprise:

- The extension of the approved NOC out-of-pit emplacement to the east and south, into an area referred to as ex-pit dump Area 9. This area is approximately 39 ha and comprises tailings dam 3. The waste rock will be used to cap the tailings dam; and
- Increasing the height of approved NOC emplacements from 135m AHD to 141m AHD.

In summary the changes to the approved NOC emplacement strategy are an extension of the out-of-pit emplacement footprint from 43ha to 82ha and an increase in height from 135m AHD to 141 AHD. There will be no change to the methods or approach to emplacement.

It is noted that the approved emplacement height documents in the NOC Mining Operation Plan (MOP) is 145 AHD. The MOP will be amended in accordance with the proposed modification. Consultation with DP&I and the Department of Resources and Energy in this regard is ongoing.

Stage 2, in combination with Stage 1, will afford emplacement capacity until 2015. Stage 3 is the subject of a separate application and will afford emplacement capacity beyond 2015.



Rehabilitation and development of the final landform within ex-pit dump Area 9 and other approved emplacements will continue to be undertaken progressively across the mined area, consistent with the existing approved approach, methodologies and final land use options described in the existing NOC MOP. However, the NOC MOP will be updated to accommodate relatively minor changes associated with the proposed modification including a final landform resulting from the proposed modifications will be provided in the updated MOP.

The proposed modifications will not result in changes to the approved tailings management strategy. A tailings dam capping strategy and lifecycle plan will be developed by Integra, prior to capping of TD3, for all tailings dams at the Complex.

The extension of the emplacement area will require the relocation of the crib site located between the approved NOC emplacement area and TD2. In addition to the existing elements of the crib site described, the new site will also include a second 5 000 L water tank and a 45 kVA diesel electric generator with local distribution and compressor. One of the crib huts and the ablution block will also be replaced. An approximate 8.5 m covered area and parking facility for trucks will also be provided within the site.

The new site will be established approximately 600m west of the existing crib site on the western edge of the approved NOC emplacement area. The site will be approximately 600m west of the existing crib site on the western edge of the approved NOC emplacement area. The site will be approximately 2.25ha in size and located within an area previously disturbed by mining activities. The proposed site is highly disturbed with patchy covering comprising introduced grass species. The construction will require minimal earthworks with excavation to a maximum depth of 2m for cables, and minor cut and fill for site levelling preparation and drainage. Construction is expected to be completed by the end of February 2012. An existing stand of trees adjacent to the new crib site will not be impacted with any excavation to occur outside of the trees' root zone.

### **Need for Modification**

A recent study of the volume of waste rock to be produced and the approved emplacement strategy for the NOC has identified a significant deficiency in emplacement capacity. The short-term dumping strategy, proposed as part of Modification 1 will address this deficiency. Without

resolution, the capacity constraints will significantly impact the efficient development of the pit, and ultimately cause mine operations to cease.

Extension to the timeframes stipulated in Conditions 42 and 43 will allow Integra sufficient time to complete further investigations into the feasibility of mechanisms to provide long term security for the biodiversity offset areas, and revise the biodiversity offset strategy in order to provide an appropriate and potentially improved biodiversity conservation value to be fully investigated.

Studies have indicated that the overland conveyor required under Condition 48 is not economically viable and its construction would result in significant disruption to existing operations, with only minimal environmental benefits. Extension to the timeframe stipulated in condition 48, for the installation and construction of the conveyor will allow a robust assessment of and consultation on, the potential impacts associated with its removal from the project approvals. It will also enable a detailed study of potential additional dust amelioration measures to be implemented in this area for underground coal haulage. Further investigations into the potential construction and operation of the conveyor will also be continued during this period. The potential removal of this condition will be the subject of a separate application. If an extension to the timeframe is not granted and trucking is required to cease then production of coal from the Underground operations would be suspended resulting in the loss of employment for Underground workers.

## **Stakeholder Engagement**

According to the proponent a comprehensive stakeholder engagement strategy is in place for the Complex. This strategy will be supplemented by activities that apply specifically to the proposed modifications. The planned stakeholder activities are based on the nature and scale of the proposed modifications.

Integra's stakeholder engagement strategy allows for consideration of stakeholders' views and timely feedback on any matters raised.

Consultation related to the proposed modification has been ongoing with Government agencies, with meetings held between Integra and KP&I on 20 September, 2011, 6 October 2011 and 4 November 2011.

A meeting with Council is proposed for early December 2011 to discuss, amongst other matters, the proposed modifications.

In addition Integra has also prepared a communications and community engagement sub-plan associated with NOC's emplacement activities. The purpose of this sub-plan is to ensure the community is informed, updated and engaged on matters pertaining to NOC's dumping.

## **Air Quality**

The emplacement area situated within ex-pit dump Area 9 is approximately 500m closer to neighbouring receivers than the approved NOC emplacement area. Receivers include those to the north-east towards Stony Creek Road and Thomas Lane, along with receivers directly to the east along Bridgman Road.

The use of ex-pit dump Area 9 for emplacement of waste rock will result in emissions associated with haulage of the waste rock to the site, fugitive emissions associated with emplacement of material, and wind erosion from exposed land. Emissions from these activities have the potential to result in higher concentrations of particulates at nearby residences. Prevailing winds are to the north-west and south-east, and therefore, residences situated to the south-east of the emplacement area at the most risk of additional impact.

However, the predicted impacts at receivers in this area are below the relevant air quality impact assessment criteria, even when considering the cumulative impact of the Complex and other sources of dust. Due to the minor change in total emissions from the proposed modification, it is not considered necessary to complete dispersion modelling to assess the potential impacts and a semi-quantitative assessment has been completed.

Consultants PAE Holmes have reviewed the potential change in particulate emissions associated with the emplacement of waste rock in ex-pit dump Area 9 and compared them with the emissions contained in the NOC air quality impact assessment and also the air quality assessment prepared for the Opencut EA.

Current operations are considered most similar to those previously modelled in the NOC and Opencut EAs for Year 3 operations, compared with the estimated TSP emissions for Year 3



operations with the estimated TSP emissions from actual Year 3 operations, which includes the use of ex-pit dump Area 9 for overburden emplacement.

Emissions would be slightly higher under the proposed modification, with negligible impacts at receivers expected to occur due to the use of ex-pit Area 9 for overburden emplacement and associated wind erosion from the emplacement area. Further, as significantly less overburden has been moved compared with the assumptions in the dispersion modelling completed for both the NOC and Opencut EAs, (approximately 4 million bank cubic metres moved, compared with approximately 8 Mbcm in the EAs), there is a reduction in overall emissions from waste activities. The increase in height of the emplacement from 135 AHD to 141m AHD will not result in a change in overall emissions from waste activities. In addition, temporary rehabilitation of part of the approved NOC emplacement area in Area 3 will result in no increase in total exposed area compared with the assumptions in the NOC and Open Cut EAs.

Although it is expected that fugitive emissions from the proposal would remain negligible, dust control measures may be implemented to further minimise airborne emissions

Air quality management associated with emplacement of waste rock in ex-pit Area 9 will be undertaken in accordance with the Air Quality Management Plan which will be revised to incorporate this area.

An Air Quality Management Plan, will be prepared in accordance with Condition 26 of the project approvals, and submitted to the DP&I for assessment.

## **Noise**

The existing noise climate for local receiver areas surrounding the Complex varies. Noise monitoring at the Complex consists of attended and unattended measurement and real-time monitoring. There are no prescribed noise monitoring locations with the project approvals; however, a real-time management system and a monitoring program are contained within the Noise Management Plan which, in accordance with Condition 10 of the project approvals is required to be prepared.



Recent unattended and short term attended noise monitoring was completed for the months of winter 2011. This monitoring identified management zones for a small number of residences to the north and east of the NOC.

Acoustic impacts associated with the extension of the NOC emplacement into ex-pit dump Area 9 and the proposed increase in the maximum emplacement height have been reviewed and compared against current emissions from the NOC emplacement area and combined site noise from the Complex. The review has considered several aspects that influence noise propagation including source height and the reduced distance of ex-pit dump Area 9 to receivers in the north through to the south-east.

Calculations have identified that receivers nearest to ex-pit dump Area 9, including those situated to the north-east towards Stony Creek Road and Thomas Lane, along with receivers directly to the east and south-east along Bridgman Road, may experience a maximum increase of between 1 to 1.5 dB in contribution from haulage associated with the emplacement due to the proposed modification.

In summary the acoustic impact from the proposed modification combined with existing mine noise from the Complex, is not expected to be significant.

The Complex is in the process of developing additional noise management measures to reduce noise emissions. A Noise Management Plan and blast Management Plan for the Complex have been prepared in accordance with Conditions 10 and 19 respectively for the project approvals.

The Noise Management Plan will be revised, subject to approval, to reflect any management or monitoring measures associated with quantifying impacts from the hauling associated with the emplacement of waste rock in ex-pit Area 9.

## **Other Environmental Considerations**

### **Ecology**

Fauna and Flora assessments were undertaken for the NOC EA respectively by Consultants Geoff Cunningham Natural Resource Consultants and Countrywide Ecological Services.

The majority of ex-pit dump Area 9, the area proposed for the extension of the approved NOC out-of-pit dump, was classified as 'Rehabilitated and Disturbed Land'. This vegetation community was determined as having low ecological value and was not required to be offset as part of the offset strategy proposed in the NOC EA that was subsequently subsumed into the Complex's project approvals. The majority of the ex-pit dump Area 9 remains disturbed with only small areas of rehabilitated vegetation still in its early phases of development.

A portion of ex-pit dump Area 9, which incorporates TD3 and an area between the southern boundary of the NOC project site and TD2, was not assessed in the NOC EA. This area has been previously entirely disturbed by mining operations and is mostly devoid of vegetation apart from some partially grassed areas and a few small shrubs.

The proposed NOC emplacement extension area and new crib site are entirely within an area that has been previously disturbed and utilised as an emplacement area for waste rock from the Camberwell Coal Mine North Pit which ceased mining in 1999. A small portion of this area has since been rehabilitated though no substantial vegetation clearing will be undertaken to accommodate the proposed modification with only immature planted trees and shrubs to be removed. Therefore there will be no significant impacts on ecology as a result of the proposed extension of the NOC emplacement.

### **Aboriginal Heritage**

An Aboriginal heritage assessment of the NOC area was undertaken by consultants HLA Environsciences Pty Ltd. The NOC area is highly modified by past disturbance and the majority of the area, including ex-pit Area 9, was assessed as having low archaeological sensitivity. As detailed previously, the proposed NOC emplacement extension area is entirely within an area that has been previously disturbed and utilised as a waste rock emplacement for the Camberwell Coal Mine.

It is concluded there will be no impacts on Aboriginal heritage as a result of the proposed modifications and no mitigation measures are required.

### **Non-Aboriginal heritage**

The Open Cut Project EA assessed the impacts of this proposal on Dulwich Homestead Site which is listed as a heritage item of local significance under the Singleton LEP. This item is

located approximately 2km to the west of the ex-pit dump Area 9, and will not be impacted by the extension of the NOC into this area.

No items or places of non-Aboriginal heritage significance are located within the ex-pit dump Area 9. Accordingly there will be no impacts, monitoring or measures required.

## **Visual**

The Complex's existing visual environment is typical of rural areas within the upper Hunter Valley.

A visual assessment for the NOC was carried out by consultants in 2007. The ex-pit dump Area 9 is located to the south of the approved NOC emplacement and will be at the same elevation. The most sensitive viewpoints, residences to the north that have full visibility, will have no increase in visual impact as the extension will be located behind existing emplacement area and therefore will not be visible from this direction.

Sensitive view points to the south-west will have only partial views of ex-pit dump Area 9 due to the intervening topography and vegetation. Again the direction of the view points and the location of the ex-pit dump Area 9 in relation to the existing emplacement area will mean that it will be indiscernible visually. It is unlikely that there will be a significant increase in visual impact for these residences.

The proposed ex-pit dump Area 9 may be partially visible to some view points to the west that already have partial view of the NOC emplacement, as well as other facilities at the Complex. However as this area will be consistent with the existing NOC emplacement in terms of height and features, it will be relatively indiscernible from these views. As the views are only partial, and are more than 2km from the ex-pit dump with an existing mining outlook, the modification is expected to have minimal to no visual impact.

## **Water**

The existing water management system involves the full containment of dirty process water and surface run off from disturbed areas on the site and the diversion of clean surface runoff from undisturbed or rehabilitated catchments into the downstream drainage system to Glennies Creek.



Dirty water currently flows to three main water storage dams. There are also a number of smaller dirty water storage dams east of the approved NOC emplacement area.

Ex-pit dump Area 9 will be located in the catchment area which contains the approved NOC emplacement. There is currently sufficient capacity in the approved dirty water storage dam network to accommodate any changes resulting from the extension of the NOC emplacement in ex-pit dump Area 9. It is considered that the extension to the NOC emplacement can be incorporated within the existing surface water management system. Therefore there will be no significant impacts on surface water as a result of the proposed modifications.

The extension to the NOC emplacement will not impact on groundwater.

### **In Summation**

Integra seeks approval from the Minister of Planning and Infrastructure to modify project approvals PA 08-0101 and PA 08-0102 under Section 75W of the EP & A Act.

The environmental impact assessment has determined that the potential impacts associated with the proposed modifications are minor to negligible.

The proposed modifications can be managed under the Complex's existing management systems which will be revised as necessary subject to approval of the proposed modifications. Additional management measures have been proposed for the management of potential noise and air quality impacts within the extension of the NOC emplacement into ex-pit dump Area 9, though impacts are expected to be of minor nature.

The Union considers that on balance, the overall potential impacts of the proposed modifications are consistent with the approved development and objectives of the EP&A Act, and therefore support the proponent's application.

A handwritten signature in black ink, appearing to read 'Grahame Kelly', with a stylized, cursive script.

**Grahame Kelly**

**DISTRICT SECRETARY**