

**Illawarra Coal**

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7 July 2009

Department of Planning  
GPO Box 39  
SYDNEY NSW 2001  
Attn: Alison O'Reilly

Dear Alison

**Response to Submissions  
West Cliff Coal Preparation Plant Reliability Project (08\_0243)**

Thank you for providing the submissions sent to the Department of Planning (DoP) in response to the exhibition of the abovementioned Project. Our response to each submission is provided in Attachment A.

We note that no objection to this Project was raised by any NSW Government Agency, and that only a single objection was received from a member of the community.

Illawarra Coal would like to commence construction of the West Cliff Coal Preparation Plant Reliability Project as soon as possible. To this end, we request that the Minister for Planning grant approval for this Project by mid August 2009.

Should you have any further queries in relation to this Project application please do not hesitate to contact me.

Yours sincerely,



**Bruce Blunden**  
Manager – Environmental Approvals

## **Appendix A**

### **West Cliff Coal Preparation Plant Reliability Project (08\_0243) Response to Submissions**

#### Department of Environment and Climate Change (DECC)

DECC support the project in its current form. No variation to the West Cliff Environment Protection Licence will be required due to this Project.

#### Department of Water and Energy (DWE)

The current and proposed water balance for the West Cliff CPP is provided in Section 4.2 of the Environmental Assessment. In 2007/08, the West Cliff CPP used 583 ML to wash ROM coal, where 436 ML was returned to Brennans Creek Dam for reuse or discharge and 147 ML was lost to the system as moisture in clean coal. As described in the Environmental Assessment, the consumption of water after the implementation of the reliability project will be approximately the same as the current water use, with the potential for less water lost in clean coal due to improved Horizontal Band Filters. Further, a water balance for the whole West Cliff site is provided in Figure 5 using data for the 2007/08 period. This water balance includes water extraction from Brennans Creek Dam, incidental water make from West Cliff mine, discharge from the West Cliff site via Brennans Creek Dam, and use in the CPP. All water extraction at the West Cliff site is undertaken in accordance with Water Act Licence No 10SL038404 as described in Section 4.2 of the Environmental Assessment. Licence No 10SL038404 specifies that the licensee may divert of volume of water of 1,100 ML/year for mining use, or up to twice the licensed volume in one year provided diversions do not exceed three times the licensed volume in any three year period. The net volume of water exported from the water management system at West Cliff as moisture in clean coal is in compliance with this License requirement.

Given that Environmental Assessment specifies that no significant change in water use will occur as a result of the West Cliff CPP Reliability Project, and that water will be sourced from Brennans Creek Dam in accordance with an existing Water Act licence, we believe that sufficient information has been provided to enable approval of this Project.

#### Wollondilly Shire Council (WdSC)

- (i) Truck movements: The Bulli Seam Operations Part 3A Project Application will assess traffic related impacts from operations at West Cliff. The implications of coal truck movements associated with the West Cliff operation was also assessed in the recently approved Part 3A application made by the Port Kembla Coal Terminal. As acknowledged by WdSC, the small potential production increase that may be realised by this Project will have an insignificant impact on the volume of traffic on external roads.
- (ii) Water: Due to the installation improved Horizontal Band Filters as part of this Project, there is potential for less water to be lost from the West Cliff water management system in exported clean coal. Water recovered from the Horizontal Band Filters will be treated and returned to Brennans Creek Dam, where it will be either reused or discharged.

- (iii) Greenhouse Gas/Electricity Consumption: Illawarra Coal has a proud history of minimising and abating GHG emissions, and adopting power saving initiatives where it is reasonable and feasible to do so. We acknowledge WdSC commendation of our efforts to reduce our GHG footprint.

#### Department of Primary Industries (DPI)

DPI considers that the Environmental Assessment adequately addresses the environmental management issues relating to the construction and operation of the CPP and its later rehabilitation. Illawarra Coal will progressively update its closure plan for West Cliff Mine during the course of its life in accordance with NSW regulatory requirements.

#### Jaden Harris

Illawarra Coal produces coking coal for use in iron and steel making. Coking coal is used to make coke, which is a necessary physical and chemical input to the iron and steel making process. No economically viable alternatives to the use of coke in the manufacture of large volumes of iron and steel exist.

This Project does not seek to increase the production of coal mined. As described in the Environmental Assessment (see Section 7.7), the implementation of this and other Projects by Illawarra Coal will give rise to considerable Greenhouse Gas abatement and reduced electricity consumption outcomes.