

NSW Department of Planning Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Director – Coal and Quarries Assessments

Your Ref:
Our Ref:
File:
Date:

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28 August 2019

Dear Sir / Madam

REVISED PREFERRED PROJECT – RUSSELL VALE COLLIERY UNDERGROUND EXPANSION PROJECT

Independent Expert Panel for Mining in the Catchment & Surface Water and Groundwater Issues

Council notes that Wollongong Coal has provided a revised mine plan based on a non-caving first workings mining system in order to try to address the uncertainty regarding the impacts of longwall mining, raised by the Planning Assessment Commission in their Second Review Report. Council also notes that the Independent Expert Panel for Mining in the Catchment has been established to provide informed expert advice to the Department on the impact of mining activities in the Greater Sydney Water Catchment Special Areas, with particular emphasis on the risks to the quantity of water in the Catchment Special Areas.

The Independent Expert Panel for Mining in the Catchment has three specific Terms of Reference, namely:

1. Undertake an initial review and report on specific coal mining activities at the Metropolitan and Dendrobium Coal Mines in the Greater Sydney Water Catchment Special Areas;
2. Undertake a review of current coal mining in the Greater Sydney Water Catchment Special Areas with a particular focus on risks to the quantity of water available, the environmental consequences for swamps and the issue of cumulative impacts associated with the Dendrobium, Metropolitan, Russell Vale and Wongawilli Coal Mines; and
3. Provide advice as required to the Department on mining activities in the Greater Sydney Water Catchment Special Areas and specifically future EIS applications / extraction plans / subsidence management plans for each of the mines.

The Independent Expert Panel has produced the "Initial Report on Specific Mining Activities at the Metropolitan and Dendrobium Coal Mines" as the first part of their Terms of Reference. This report found that up to 3 megalitres per day of surface water and groundwater seepage into Dendrobium Coal Mine workings instead of the creeks and reservoirs. At Metropolitan Coal Mine, approximately 500,000 litres per day of surface water and groundwater seepage may be going into the mine workings instead of Woronora Reservoir or creeks. The report also notes that groundwater, surface water and subsidence issues are very complex and difficult to understand.

In light of the above, Council is concerned about the loss of water to reservoirs due to mining activities. Council does not want to see any further water losses to reservoirs, creeks and upland swamps as a result of mining activities.

It is noted that Table 5.3 in the Umwelt report predicts that 0.53 megalitres per day or 193.5 megalitres per year of groundwater will inflow into the mine workings as a result of the Wonga East project. A total mine inflow of groundwater is predicted to be in the order of 0.79 megalitres per day or 288 megalitres per year.

Therefore, Council requests that the revised preferred project for Russell Vale Colliery be considered by the Independent Expert Panel for Mining in the Catchment, as a precautionary peer review measure, before any approval recommendation is made by the Department to the Independent Planning Commission. This is due to the fact that the Bulli and Balgownie coal seams have already been extracted above the subject Wongawilli coal seam and there is a potential risk that the water losses may in fact be greater than predicted from the proposed mining of the Wongawilli coal seam. The Independent Expert Panel for Mining in the Catchment should review the proposal's potential impact upon the quantity and quality of water available in the catchment

for drinking water supplies and for upland swamps. Further, the Panel is requested to consider the cumulative impact that the proposed Russell Vale coal mine and other coal mines have on drinking water supplies and the health of upland swamps in the Greater Sydney Water Catchment Special Areas.

New Coal Processing Plant & Reject Materials Handling

The screening and sizing station (as part of the coal processing plant) is likely to cause some potential noise issues to surrounding residential development in the locality. However, the proposed redesign of the Pit Top layout to strategically relocate infrastructure to more shielded locations will assist in reducing potential noise impacts. Additionally, the implementation of additional noise mitigation works at the pit top such as the new noise barrier, as well as the extension to the height of existing bunds will also assist in reducing potential noise issues. Further, the acoustic treatment of coal processing infrastructure will result in noise levels being within acceptable levels for the majority of the time the site is operational. The Umwelt report indicates that only negligible (1-2dB) exceedances predicted at surrounding residences will occur for a small percentage (less than 10%) of winter nights. This scenario is considered acceptable from Council's perspective provided that these pit top noise control measures are included as conditions of the project approval (if the project is ultimately recommended for approval by the Department and the Independent Planning Commission).

The Umwelt report (page 21) also indicates that *"...any rocky reject material that is separated by the coal processing plant will be transferred to a rejects stockpile by the rejects conveyor from where it will either be loaded onto road trucks to be sold as VEHM fill material or transferred to the mine portal and emplaced underground or used in site rehabilitation works."*

Importantly, the current Russell Vale Colliery Emplacement Area (governed by Development Consent No. 1989/839) will no longer be used as part of this project. As per the current Department of Planning Industry and Environment Development Control Order applying to the emplacement area, rehabilitation works are likely to occur within the next 3 - 6 months upon the emplacement area. In this regard, Council staff are awaiting revised final rehabilitation plans and associated documentation from Wollongong Coal for sign-off, before final rehabilitation works can commence.

Accordingly, Council requests that an appropriate condition be provided on any approval stating that under no circumstances is coal reject material to be deposited upon the former Russell Vale Colliery Emplacement Area (should the project ultimately be approved).

Coal Transport to Port Kembla Coal Terminal & a Road Maintenance Contribution to Council for the Maintenance of Bellambi Lane

Product coal will be transported by truck to Port Kembla Coal Terminal (PKCT) through the use of semi-trailers and / or truck and dog trailers. Wollongong Coal may in the future seek to use B-doubles vehicles which would reduce the number of trucks per hour. This change would need to be done via a future amendment to the project approval.

The transport route will be from the pit top via Bellambi Lane and Memorial Drive, which is the route that has been historically used for the transport of coal from the colliery to PKCT.

It is proposed that outbound laden truck movements will be limited to an average of 16 per hour between the hours of 7.00 am to 6.00 pm Mondays to Fridays and 8.00 am to 6.00 pm Saturdays. Further, it is proposed that coal transport may occasionally be required until 10.00 pm Mondays to Fridays as a result of unexpected port closures or interruptions. If this is the case, outbound laden truck movements will be further limited to an average of 12 trucks per hour between 6.00 pm to 10.00 pm Mondays to Fridays.

However, Council recommends that a condition of approval be imposed which requires Wollongong Coal to obtain special one-off written clearances from the Department to undertake any coal transporting between the hours of 6.00 pm to 10.00 pm Mondays to Fridays. Any such request by Wollongong Coal would need to demonstrate as to why the variation to the normal hours of coal transport is necessary and appropriate, in the circumstances.

The Umwelt report (page 162) states that Wollongong Coal will seek to reach agreement with Council within 12 months of the project approval for a road maintenance contribution for the maintenance of Bellambi Lane. This arrangement is considered acceptable and hence, Council requests that a condition be imposed dealing with this statement of commitment that Wollongong Coal seek to reach agreement with Council within this 12 month timeframe (should the project ultimately be approved).

Should you have any enquiries or wish to discuss this matter further, please contact Mr Ron Zwicker, Special Projects & Planning Support Manager on telephone number (02) 4227 7111.

This letter is authorised by

Mark Riordan
Manager Development Assessment & Certification
Wollongong City Council
Telephone (02) 4227 7111