

Stephen O'Donoghue - CCP - EPA comments

From: Phil Towler <ptowler@emgamm.com>
To: Stephen O'Donoghue <Stephen.O'Donoghue@planning.nsw.gov.au>
Date: Thursday, 12 September 2013 11:23
Subject: CCP - EPA comments
CC: Oliver Muller <omuller@emgamm.com>, Trish McDonald <Trish.McDonald@cobbo...

Steve

Thank you for the EPA comments. As you recognise, the majority repeat EPAs comments on the PPR&RTS (February 2013). The CHC responses to these provided in the Supplementary Information report (February to May 2013) Appendix A are unchanged.

Water quality parameters (p5)

We note EPA's requirement to monitor VOCs, cyanide and radionuclides for the first 12 months as opposed to on an ongoing basis. This is a reasonable approach.

Heavy vehicle movements (p9)

The CHC commitment to limit heavy vehicle (greater than a tare weight of 30 tonnes) deliveries to the hours specified by EPA is to address the EPA requirement to restrict 'heavy vehicle movements to and from the site' – see Response to PAC Recommendation 15. The EPA's requirement is unlimited spatially and the condition as proposed by EPA could be read that that a truck destined for the site could not leave a distant location (say Sydney) outside of the specified hours.

CHC can control the delivery of materials to the site through the contracts it has with suppliers. This includes specifying delivery times and the routes that delivery vehicles may use. As described in the EA (Section 12.5.2), this will include contractual measures so that access to the site is from the Golden Highway and the section of Spring Ridge Road (or its realignment) north of the mine.

The routes taken by trucks leaving the site can also be controlled (ie ensuring they travel north to the Golden Highway). However, it is harder to implement controls that ensure that all heavy vehicles leave the site within the hours specified by EPA.

The EPA issue is does not appear to be related to residences close to the mine entrance but trucks using local roads. The small number of trucks leaving "outside of hours" would join the small number of other trucks (eg those associated with agricultural activities) that use the local roads currently and will continue to do so.

Trucks will generally leave the site as soon as possible after arriving (ie within the specified hours). If the EPA condition is adopted as it stands, a short delay to a truck leaving the site late in the day could mean that the truck (and its driver) would effectively have to be impounded until vehicle movements were allowed. This is not practical or reasonable. Therefore, it is requested that the condition reflects CHC's commitment rather than the more general EPA suggested condition.

Construction noise (p10)

P10, Construction noise: it remains likely that some construction activities will need to out outside of

standard hours. However, it is recognised that a) these activities will be determined as part of detailed construction planning, b) that reasonable and feasible noise reduction measures will need to be considered as part of this planning and c) that consultation with potentially impacted residents will need to occur closer to the time of construction. It is therefore accepted that out-of-hours work is restricted pending further consultation and assessment. These assessments would consider the comments raised by EPA regarding the current out-of-hours assessment.

Noise criteria (p11-12)

We note that the noise criteria on L6.1 will be updated as the current limits are not consist with the RING. We have made no comment at this stage but would the opportunity to review the updated version. Could you please send these through to the recipients of this email?

Best regards

Phil

Philip Towler
Associate Director

Sydney, Newcastle and Brisbane.



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From: Stephen O'Donoghue [mailto:Stephen.O'Donoghue@planning.nsw.gov.au]

Sent: Tuesday, 10 September 2013 2:53 PM

To: Phil Towler

Cc: Matthew Riley

Subject: Fwd: RE: FW: Cobbora Coal Project - Response to PAC Recommendations and Revised Preferred Project Report

Phil FYI. Please note that Brad is tied up next few days, but I will be seeking further advice / possible amendment regarding the recommended noise limits as they appear to be based on extraction plus rail to derive INP noise predictions - that is used table 2 rather than table 3 for the revised PPR report. Note EPA advice confirming that RING should apply for rail spur line. I'll clarify and forward any amendment. Otherwise again if you have any further input for anything else that you have not raised before let me know.

Also in relation to noise did Oliver manage to work out number of receptors affected by rail noise under the 'planned' rail movements, also did he have any further advice regarding by how much the noise barriers may reduce maximum noise levels at the 2 receptors.

Regards

Steve

Stephen O'Donoghue
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>>> Bradley Tanswell <bradley.tanswell@epa.nsw.gov.au> 10/09/2013 12:18 >>>

Steve,

Please find attached the EPA's comments on the revised Preferred Project Report. Apologies again for the delayed response. This will also be sent today via mail.

Regards,

Brad

Brad Tanswell

Acting Head Far West Operations | NSW Environment Protection Authority |

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bradley.tanswell@environment.nsw.gov.au

From: Stephen O'Donoghue [mailto:Stephen.O'Donoghue@planning.nsw.gov.au]

Sent: Wednesday, 28 August 2013 9:24 AM

To: Tanswell Bradley

Subject: Re: FW: Cobbora Coal Project - Response to PAC Recommendations and Revised Preferred Project Report

Thanks Brad.

Cheers

Steve

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>>> Bradley Tanswell <bradley.tanswell@epa.nsw.gov.au> 28/08/2013 08:23 >>>

Hi Steve,

I have been advised we have key staff involved in assessment of Cobbora out of action this week and back on board next week so unfortunately EPA I will be unable to get our comments to you by end of the week (30 August). We will endeavour to get advice to you as early next week as possible however I envisage it will be toward the end of next week (and by 6 September at the outside).

Regards,

Brad

Brad Tanswell

Acting Head Far West Operations | NSW Environment Protection Authority |

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From: Stephen O'Donoghue [mailto:Stephen.O'Donoghue@planning.nsw.gov.au]
Sent: Wednesday, 14 August 2013 4:49 PM
To: Tim Baker; Tanswell Bradley; julie.moloney@industry.nsw.gov.au; liz.rogers@dpi.nsw.gov.au; Wynn Samantha
Cc: Matthew Riley; landuse.enquiries@dpi.nsw.gov.au
Subject: Cobbora Coal Project - Response to PAC Recommendations and Revised Preferred Project Report

Dear Tim, Brad/ Sam, Julie, Liz

Cobbora Holding Company (CHC) has submitted a report to DP&I providing a response to the PAC recommendations including a revised Preferred Project Report (PPR).

The revised PPR considers the PAC recommendations and amends the mine plan to reduce impacts on bio-diversity and to reduce the disturbance area of the mine. As a consequence, the mine footprint has been revised and reduced and the sequence of mining modified to adopt a 2 or 1 pit mining operation rather than 3 pit operation over the mine life.

The report also discusses implications and project justification/ drivers since the NSW Government announced that the Cobbora Coal Mine would be sold or leased.

The report can be downloaded for review from the Department's website at:

Cobbora page - go to folder "Response to PAC Review and revised PPR"

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=3695

Report - Part 1- Main Report

[https://majorprojects.affinitylive.com/public/a4b9ab5650cfa5e8185989530074bd96/01.%20Cobbora%20Coal%20Project%20-%20Response%20to%20PAC%20Review%20and%20Revised%20PPR%20\(Part%201\).pdf](https://majorprojects.affinitylive.com/public/a4b9ab5650cfa5e8185989530074bd96/01.%20Cobbora%20Coal%20Project%20-%20Response%20to%20PAC%20Review%20and%20Revised%20PPR%20(Part%201).pdf)

Report Part 2 - containing

Appendix A Revised Mine Plan - Technical and Financial Considerations

Appendix B Tailings Management Review

Appendix C Tailings Storage Facilities Management Plan

Appendix D Response to PAC review of water modelling

Appendix E Revised Mine Plan - groundwater and surface water assessment

Appendix F Revised Mine Plan - mine rehabilitation strategy

[https://majorprojects.affinitylive.com/public/68fbacb0ae5e519b9fa55ffd4bc70758/02.%20Cobbora%20Coal%20Project%20-%20Response%20to%20PAC%20Review%20and%20Revised%20PPR%20\(Part%202\).pdf](https://majorprojects.affinitylive.com/public/68fbacb0ae5e519b9fa55ffd4bc70758/02.%20Cobbora%20Coal%20Project%20-%20Response%20to%20PAC%20Review%20and%20Revised%20PPR%20(Part%202).pdf)

Part 3 containing

Appendix G - Bio-diversity Offset Strategy

Appendix H - Revised Mine Plan - air quality and greenhouse gas assessment (part)

[https://majorprojects.affinitylive.com/public/e5909bab8014d664d49a3f6783c80046/03.%20Cobbora%20Coal%20Project%20-%20Response%20to%20PAC%20Review%20and%20Revised%20PPR%20\(Part%203\).pdf](https://majorprojects.affinitylive.com/public/e5909bab8014d664d49a3f6783c80046/03.%20Cobbora%20Coal%20Project%20-%20Response%20to%20PAC%20Review%20and%20Revised%20PPR%20(Part%203).pdf)

Part 4 containing

Appendix H - Revised Mine Plan - air quality and greenhouse gas assessment (part)

Appendix I - Revised Mine Plan - noise assessment

Appendix J - Revised Mine Plan - impacts to Aboriginal sites

Appendix K - Revised Project - Economic Assessment

[https://majorprojects.affinitylive.com/public/37ecca824b4df317d2fc7e0930b6d8fa/04.%20Cobbora%20Coal%20Project%20-%20Response%20to%20PAC%20Review%20and%20Revised%20PPR%20\(Part%204\).pdf](https://majorprojects.affinitylive.com/public/37ecca824b4df317d2fc7e0930b6d8fa/04.%20Cobbora%20Coal%20Project%20-%20Response%20to%20PAC%20Review%20and%20Revised%20PPR%20(Part%204).pdf)

If you wish to provide any further comment or submission on the project can you provide comments directly to me by email by **Friday 30 August 2013** with hard copy sent to:

Director Mining and Industry Projects

Department of Planning & Infrastructure

GPO Box 39

Sydney NSW 2001

Please call to discuss as necessary.

Thanks

Steve

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