



DOC19/1060742-17

Department of Planning, Industry and Environment
Returned via the Major Projects Portal

Attention: Ms Lauren Evans

24 January 2020

Dear Ms Evans

**Environmental Impact Statement Exhibition
Glendell Continued Operations Project (SSD 9349 (and 5850))**

I refer to the email from the Department of Planning, Industry and Environment (DPIE) to the Environment Protection Authority (EPA) dated 4 December 2019 seeking the EPA's advice in relation to the adequacy of the Environmental Impact Statement (EIS) for the Glendell Continued Operations Project (SSD 9349 and 5850) and any recommended Conditions of Approval.

The Proponent, Mt Owen Pty Limited, is proposing to extend the existing Glendell Mine into a new mining area to the north, providing access to approximately 135 million tonnes of additional coal reserves and extending the life of the mine until 2044. The Proposal also integrates with other mining infrastructure in the Mount Owen complex.

The EPA has reviewed the EIS and has determined that it requires additional information to properly assess the proposal. The EPA's additional information requirements are provided at **Attachment A** to this letter.

If you have any questions about this matter, please contact Matthew Corradin on 02 4908 6830 or by email to hunter.region@epa.nsw.gov.au.

Yours sincerely

MITCHELL BENNETT
Head Strategic Operations Unit
Environment Protection Authority

ATTACHMENT A – EPA additional information requirements

The EPA requires the following information to adequately assess the proposal:

Air

- **Details of PM_{2.5} mitigation measures**

The EPA requires details of the mitigation measures that will be implemented to reduce the predicted PM_{2.5} impacts and associated risk of exceedances of relevant PM_{2.5} impact assessment criteria due to the Proposal.

Appendix G of the Air Quality Impact Assessment (AQIA) predicts impacts from the Proposal equal to the EPA's annual average PM_{2.5} impact assessment criteria of 8 µg/m³ at ten private properties that are not subject to Voluntary Land Acquisition and Mitigation Policy (VLAMP) acquisition rights. Some of these residences are located to the east of the Glendell Mine/Mount Owen Complex in Middle Falbrook (AQIA Figure 34).

- **Analysis of PM₁₀ impacts**

The EPA requires consideration of whether additional mitigation measures can be implemented to reduce the predicted PM₁₀ impacts as a result of the Proposal as listed in the table at **Attachment B**.

Appendix G of the AQIA lists the maximum 24-hour PM₁₀ concentrations at all identified receptors. It indicates exceedances of the EPA's PM₁₀ 24-hour impact assessment criteria at numerous private properties that are not subject to VLAMP acquisition rights. Many of these residences are located to the east of Glendell Mine/Mount Owen Complex in Middle Falbrook (AQIA Figure 28).

The table at **Attachment B** lists the predicted 24-hour PM₁₀ concentrations for these private properties, and the number of days they are predicted to exceed the EPA's PM₁₀ 24-hour impact assessment criteria of 50 µg/m³ (cumulative basis). The number of predicted exceedance days for the Proposal compared to predicted exceedance days for operations in 2014 are also listed. The AQIA does not provide any further information or discussion on the exceedances of the impact assessment criteria at all these private residences.

- **Analysis of Worse Case Scenarios**

The EPA requires confirmation that background air quality was included in the modelled ground level concentrations and provide further investigation of cumulative concentrations from both the highest backgrounds and highest incremental concentrations in accordance with Table 11.3 of the Approved Methods for receptors in Table 1 in respect of PM₁₀ concentrations.

- **Source Apportionment**

The EPA requires a source apportionment assessment of particulates to quantify the contribution of the proposed Glendell operations to the air quality impacts at private residences. Additional actions and measures may need to be proposed to ensure that impacts do not exceed EPA's air quality criteria in respect of PM₁₀ concentrations.

Waste

- **Additional Waste Stream Details**

The EPA requires further details about all waste streams that will be generated as a result of activities associated with the Proposal. This should include the types of waste to be

generated (as per the EPA's Waste Classification Guidelines), the expected quantities in tonnes and the manner in which the waste streams will be managed, including all relevant mitigation measures to protect the environment. This is necessary because only a limited discussion of waste streams is provided in Section 7.15 of the EIS.

- **Justification of Waste Management**

The EPA requires adequate justification for the waste management options to be used for any wastes produced at the Premises. Waste management options should be considered in accordance with waste hierarchy contained in the *Waste Avoidance and Resource Recovery Act 2001*. Where waste will be disposed of, either on site or elsewhere, the EPA requires justification such as a life cycle analysis with environmental costs and benefits included.

This additional information is necessary because the EIS states that large waste tyres and concrete waste will be buried at the premises. This appears to be contrary to the waste hierarchy contained in the *Waste Avoidance and Resource Recovery Act 2001*.

ATTACHMENT B – 24-hour PM₁₀ concentrations and number of exceedance days at private residences with no acquisition rights. Exceedances in the 24-hour average PM₁₀ criterion of 50 µg/m³ are shown in bold.

Property ID	Maximum Cumulative 24-hour PM ₁₀ (µg/m ³)					Number of exceedance days				
	2014	Yr 1	Yr 6	Yr 13	Yr 18	2014	Yr 1	Yr 6	Yr 13	Yr 18
7a	48	52	52	52	48		1	1	1	
7b	48	52	52	52	48		1	1	1	
7c	48	51	51	51	48		1	1	1	
10	48	53	54	51	48		2	2	1	
11	48	52	54	50	48		3	3		
12	48	53	53	50	48		3	3		
13	48	55	49	49	47		1			
14	48	52	49	49	47		1			
15b	48	51	49	48	47		1			
19	48	61	59	50	48		3	3		
93	48	52	50	49	47		1			
94	48	53	49	49	47		1			
95	48	52	49	49	47		1			
134	52	54	52	50	49	1	1	1		
135	52	53	51	50	49	1	1	1		
136	51	53	51	50	49	1	1	1		
280	47	53	51	49	47		1	1		
281	47	53	51	49	47		1	1		
282	48	55	52	50	47		1	1		
290	47	51	49	48	47		1			
291	48	53	50	48	47		1			
297a	48	53	52	48	48		2	2		
297b	48	53	52	48	48		2	2		
297c	48	53	52	48	48		2	2		
299	48	54	52	49	48		2	2		
300	48	55	54	50	48		3	2		
302	48	56	54	51	47		2	1	1	
309	47	51	50	48	47		1			
310	47	51	50	48	47		1			
311	47	51	50	48	47		1			
312	47	51	49	48	47		1			
315	47	51	50	48	47		1	1		
316	47	53	51	48	47		1	1		
317	47	53	51	48	47		1	1		
318	47	53	51	48	47		1	1		
319	47	53	51	48	47		1	1		
320	47	53	52	49	47		1	1		
321	47	53	52	49	47		1	1		
322	47	54	53	49	47		1	1		
323	48	55	54	50	47		1	1		
324	48	56	54	51	48		1	1	1	
325	48	56	55	51	48		1	1	1	
326	48	56	54	51	48		1	1	1	
327	48	55	53	50	48		1	1		
328	48	54	52	49	48		1	1		
329	48	54	52	49	48		2	1		
330	48	52	51	48	48		2	1		