

31 January 2020

Lauren Evans  
Planning Officer  
NSW Department of Planning, Industry & Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Evans

**LENDELL CONTINUED OPERATIONS PROJECT (SSD-9349)**

I refer to your email of 4 December 2019 requesting advice in relation to the Environmental Impact Statement (EIS) on exhibition for the Glendell Continued Operations Project (the Project).

Glendell Mine is located approximately 20km north-west of Singleton and 24km south-east of Muswellbrook, and is part of the Mt Owen Mine Complex.

The Project proposes continuation of mining in a new area to the north of the existing mine, including an additional 750 hectares of disturbance area, extraction of an additional 135 million tonnes of coal, and an extension of time from 2024 to 2044. Additionally the Project proposes an increase in the maximum rate of extraction from 4.5 million tonnes per annum (Mtpa) to 10 Mtpa of coal. Throughput at the coal handling and processing plant will be maintained due to decreases in extraction rates at other Mt Owen Complex pits. The advancement of the Project will be to the north, away from the nearest sensitive receivers.

The comments provided in this letter are contingent on confirmation by the NSW Environment Protection Authority (EPA) that the methods employed to assess air quality and noise impacts are appropriate. If this was found not to be the case, our comments would need to be considered in light of the methodological issues identified by the EPA.

Hunter New England Local Health District (HNELHD) has reviewed the EIS concentrating on assessments of air quality, noise, water and other issues that may impact on public health, and would like to provide the following comments:

**Air Quality**

The EIS states that there are a number of private residences that are expected to experience exceedances of the annual average PM10 criteria of 25 µg/m<sup>3</sup>, though it is noted that all affected properties have existing acquisition rights.

A review of the data from the Upper Hunter Air Quality Monitoring Network for the past three calendar years 2017 – 2019, indicates that at two monitors nearest the Project, Muswellbrook to the north and Camberwell to the south, the annual average PM10 levels have exceeded the

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criteria of 25 µg/m<sup>3</sup> in two out of three years, and three out of three years respectively. In addition, in those three years Muswellbrook experienced exceedances of the 24 hour average PM<sub>10</sub> criteria of 50 µg/m<sup>3</sup> on 2, 13, and 58 occasions, while Camberwell experienced exceedances on 33, 44 and 87 occasions. While the results from late 2019 would have been heavily influenced by high levels of bushfire smoke and all years may have been influenced by dust and dust storms from afar associated with dry conditions and drought, it is still clear that the local area is regularly experiencing levels of air particulates exceeding criteria. It is recommended that this be taken into account during the decision making process.

There is no evidence of a threshold below which PM is not associated with health effects and so HNELHD strongly recommends the implementation of proactive and reactive dust control strategies, along with all best-practice interventions to minimise PM emissions.

### **Noise**

The Noise Impact Assessment in the EIS predicts that the Project can meet all noise criteria and will not increase noise impacts at private residences.

It is important that residents have access to a complaints mechanism which enables both rapid assessment and corrective measures (if required) to be implemented.

### **Potable Water**

The EIS mentions both a piped potable water supply as well as potable water supply tanks. So the source of the potable water supply is unclear.

If the site is not connected to a reticulated town water supply, then the applicant must demonstrate that the drinking water supplied at the premises will consistently meet the *Australian Drinking Water Guidelines 2011* and any subsequent amendments of the Guidelines.

The *Public Health Act 2010* and the *Public Health Regulation 2012* require drinking water suppliers to:

- have a quality assurance program (QAP) that complies with the Regulation
- comply with (i.e. implement) their QAP
- provide a copy of the QAP to the local Public Health Unit
- keep records relating to managing the safety of their drinking water supply.

The proponent is encouraged to contact Hunter New England Local Health District with respect to developing a Quality Assurance Program.

The Quality Assurance Program for the site should be submitted to this office at the address below prior to commencement of use. Further information and templates can be found at:

<http://www.health.nsw.gov.au/environment/water/Pages/private-supplies.aspx>.

If you require any further information please feel free to contact Carolyn Herlihy, Environmental Health Officer on (02) 4924 6477.

Yours Sincerely



Professor David Durrheim  
**Director Health Protection**  
**Hunter New England Population Health**