DOC20/585730-6

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

Attention: Joe Fittell

12 August 2020

Dear Mr Fittell,

Planning Referral – Advice on Modification Report
Modification 2 Northern Coal Logistics Mod 2 (SSD-5145-Mod-2)

I refer to your email to the Environment Protection Authority (EPA) on 20 July 2020 seeking advice in relation to the modification report for the Northern Coal Logistics Hub (SSD-5145) located in the Lake Macquarie local government area.

The proposed modification seeks approval for:

- Up to 1.0 Million tonnes per annum (Mtpa) of run-of-mine (ROM) coal to be transported from Myuna Colliery to Cooranbong Entry Site (CES) for blending with coal from Mandalong Mine;
- Up to 0.2 Mtpa of Mandalong ROM coal to be transported from the CES to Myuna Colliery;
- An increase from 0.5 Mtpa up to 1.5 Mtpa of coal to be received at the CES middlings stockpile; and
- An extension to the Development Consent boundary to include the Awaba Private Haul Road through to Wilton Road.

The EPA has reviewed the *Northern Coal Logistics Project Modification Report for Modification to Development Consent SSD-5145 (Report No: J200310 RP#2)* prepared by EMM Consulting and dated 3 July 2020 and has determined 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 Jenny Rushton on 02 6883 5301 or by email to hunter.region@epa.nsw.gov.au

Yours sincerely

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Attachment A: Further Information Required by the EPA

The EPA requires the following additional information prior to considering whether to recommend conditions of approval.

AIR QUALITY

1) Reviewed emissions inventory calculations noting the identified emission discrepancies exhibited in Table B.1 and Table B.2. Further, results and conclusions presented in the AQIA must be accordingly confirmed and updated.

The Air Quality Impact Assessment (AQIA) has included two different modelling scenarios. The first modelling scenario (Scenario 1) includes activities representative of the existing operations. Modelling scenario 2 includes the receival and handling of up to 6 million tonnes per annum (Mtpa) of coal, which is the maximum quantity approved in the current development consent (SSD-5145).

A screening review of the emissions inventory shows a discrepancy in the estimated emissions for the included hauling activities. It appears the calculated total emissions from hauling activities exhibited in Table B.1 and Table B.2 are expressed in tonnes per year instead of kilograms per year. It is not clear if the correct values were used to predict (model) the potential impacts from the proposed operations.

2) ***Additional justification for the level of the assessment including characterisation of the likelihood of impacts from other activities associated with the project.***

Modelling scenario 2 has included some activities representative of the receival and handling of 1 Mtpa of coal from Myuna but does not include emissions from the proposed hauling operations at the CES facility or along private roads. It is unclear, but likely that the estimated emissions inventories do not include emissions for the additional truck movements to transport up to 1 Mtpa of coal from Myuna to and within the CES and backloading 0.2 Mtpa of Mandalong Mine coal to Myuna's pit top. Given these activities are two of the main proposed modifications, further justification for the level of assessment must be provided.

3) ***Detailed information to demonstrate the adequacy and representativeness of the adopted background levels.***

Existing air quality conditions are based on data recorded at the on-site TEOM. This instrument is used to continuously measure hourly TSP and PM_{10} concentrations. The PM_{10} concentrations recorded by this instrument were adopted as an appropriate background, while the TSP background levels were calculated using a PM_{10}: TSP ratio of 40%.

The AQIA states that the measured TSP concentrations were not used to calculate an annual TSP background level as the estimated PM_{10}:TSP ratio (based on on-site data) was 80%, which "*suggests that there may be a possible instrument malfunction or data collection issue*". Based on this statement and since it is stated that the TSP and PM_{10} concentrations were recorded by the same instrument, there is uncertainty regarding the adequacy of the adopted PM_{10} concentrations. Adopting appropriate and representative background levels to assess potential cumulative impacts is required, therefore, justification must be provided to demonstrate the adequacy of the adopted background levels.