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Ref: D2013/90318

Mr. Howard Reed  
Manager Mining Projects  
NSW Department of Planning & Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr. Reed

**Centennial Western Coal Services Project (SSD-5579)**

I refer to a letter received from RPS Australia East Pty Ltd dated 20 August 2013 requesting the Sydney Catchment Authority's comments on the Environmental Impact Statement (EIS) for the Centennial Western Coal Services Project. The Sydney Catchment Authority (SCA) appreciates the opportunity to provide its comments at this stage of the environmental assessment.

The proposed development is located wholly within the Upper Cox's River sub-catchment that is part of the Sydney Drinking Water Catchment. The SCA believes the development has the potential to adversely impact on water quantity and quality. Therefore, it is important that the proposed development be constructed, operated and rehabilitated in a manner which does not adversely affect the quantity and quality of surface and ground waters.

The SCA has the following comments:

1. The proponent's surface water assessment predicts a slight reduction in the daily average discharge from the current scenario of 1.5 to 1.33 ML per day and that only 2% of the discharges are predicted over the EPL limit of 10ML per day. The surface water assessment further predicts that approximately 70% of the discharge will constitute clean water and the remaining 30% dirty water due to the proposed separation of clean and dirty water systems. Given that the discharge is proposed from the dirty water system only, which could increase concentrations of pollutants, the SCA considers the proponent should include provisions for additional treatment of dirty water prior to discharge off site.
2. The SCA notes that additional groundwater bores are proposed to be installed to better understand the groundwater movement between the site and Wangcol Creek. However, the SCA considers that the groundwater assessment is based on insufficient baseline groundwater quality data of less than two years (only four monitoring events). The SCA expects that there will be sufficient baseline monitoring data prior to any construction activity and the ground water assessment should be revised if there is significant departure in the monitoring data.
3. The groundwater assessment predicts an increase in inflow to the existing Cooks and DML dams, which are located nearest to the surface water discharge point, from the current scenario of 3.0 to 7.7 cubic metres per day as a result of reject emplacement over a 25 year period. This is a net increase of 4.7 cubic metres per

day. The EIS does not provide any management measures to reduce groundwater inflows to Cooks and DML dams which have been affecting the discharge water quality to Wangcol Creek. The EIS also does not specifically address the impacts of the proposed reject emplacement area on groundwater quality. The SCA considers that both of these matters should be addressed by the proponent.

4. Approximately 40 hectare of land is proposed to be cleared as part of this development, including clearing of existing revegetated areas. However, the EIS does not provide any offsets for vegetation clearing except rehabilitation of disturbed areas. The SCA considers that the Proponent should be required to consider additional offsets such as revegetation and rehabilitation of Wangcol Creek.
5. The SCA notes that the proposed future reject emplacement area overlaps with the Lamberts South ash placement area of the Mount Piper power station. The ash placement project was approved by the Department of Planning & Infrastructure on 16 February 2012 and is currently under construction. The EIS has not addressed the implications of the dual use of this area for both projects. The SCA considers that this matter needs to be addressed.

The SCA would appreciate being involved in the further assessment of the application including comments on draft conditions of approval.

If you wish to discuss any matter in this letter, please do not hesitate to contact Dr Girja Sharma, A/Team Leader Assessments, on 4724 2459 or [girja.sharma@sca.nsw.gov.au](mailto:girja.sharma@sca.nsw.gov.au)

Yours sincerely

for

**MALCOLM HUGHES**

**A/Senior Manager, Sustainability**

4/10/2023

cc Neville Osborne, Infrastructure Projects, Department of Planning & Infrastructure