



Centennial Coal



Western Coal Services Project Response to EIS Submissions

October 2013

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1. Introduction

Springvale Coal proposes to upgrade the existing Springvale Coal Services site and amalgamate the related coal transport and logistic functions of Springvale Coal Mine and Angus Place Colliery. The Project Application Area which was the subject of an Environmental Impact Statement (EIS) is provided a Figure 1.

The EIS was publicly displayed between 26th August 2013 and 26th September 2013. There were nine government agency submissions, two public submissions and one special interest group submission as listed below:

- ☐ Department of Primary Industries (includes separate comments from NSW Office of Water, Agriculture NSW and Fisheries NSW);
- ☐ Sydney Catchment Authority;
- ☐ NSW Health – Nepean Blue Mountains Local Health District;
- ☐ NSW Department of Trade and Investment, Regional Infrastructure and Services – Division of Resources and Energy;
- ☐ NSW Transport Roads and Maritime Services;
- ☐ Environment Protection Authority;
- ☐ Office of Environment and Heritage;
- ☐ Forestry Corporation of NSW – Macquarie Region;
- ☐ Lithgow City Council;
- ☐ Nature Conservation Council of NSW;
- ☐ Energy Australia; and
- ☐ Private Resident (name withheld).

Separate correspondence was provided by the NSW Department of Planning and Infrastructure which requested this Response to Submissions.

Issues raised are discussed in the following section with a specific response provided in Appendix A. No issues have been raised which require a change in the project as assessed in the EIS, however a revised Statement of Commitments is provided in Section 3 which includes some additional commitments arising from the submissions.

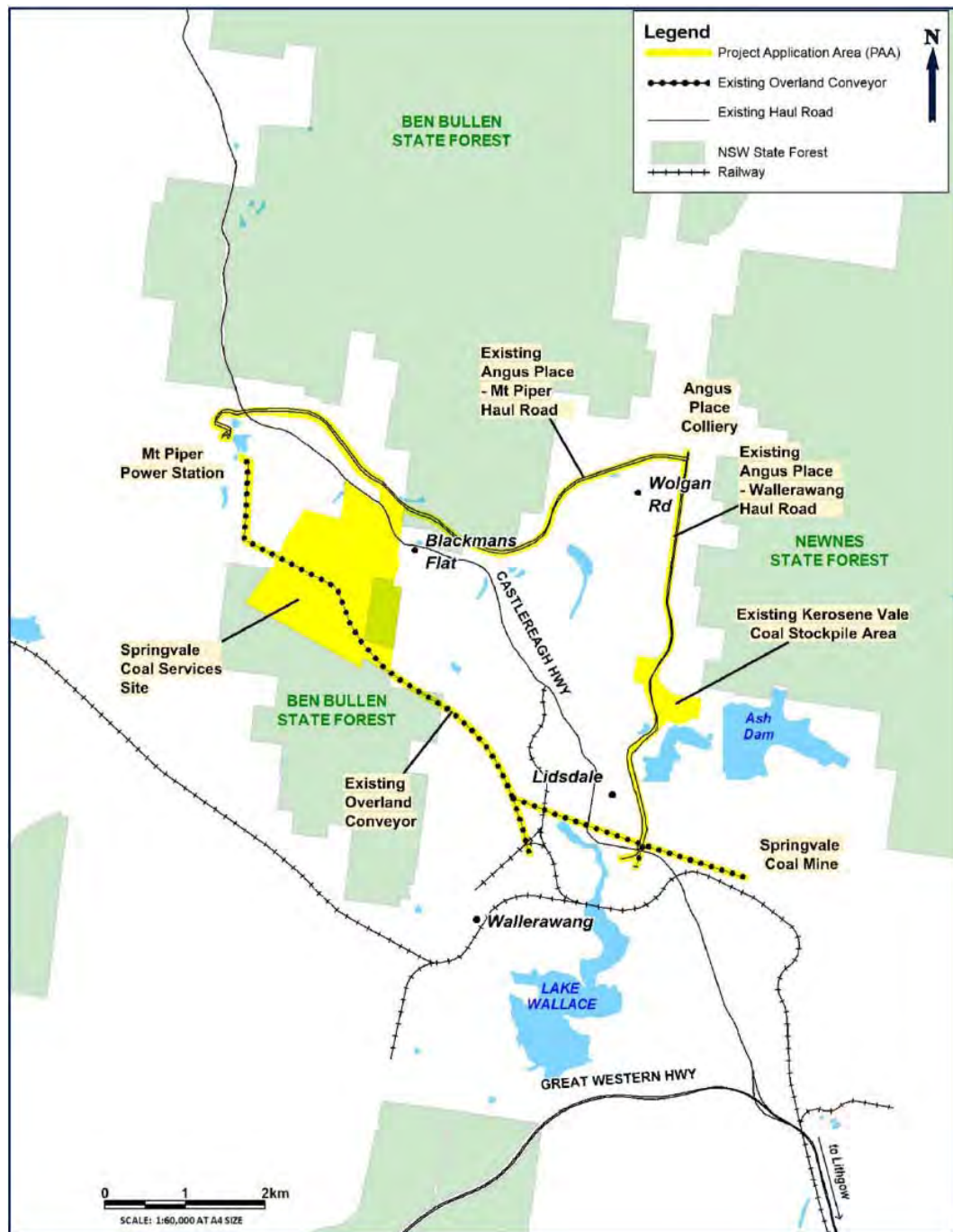


Figure 1 Project Location

1.1 Project Overview

The project as described in the EIS involves an upgrade the existing Springvale Coal Services site and amalgamation of related coal transport and logistic functions. The Western Coal Services Project comprises:

- ❑ Upgrade the existing Washery and supporting infrastructure within the Springvale Coal Services Site by constructing a new Washery adjacent to the existing facility that will remain operational to provide a total processing capacity of up to 7 Million tonnes per annum (Mtpa);

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- ❑ Construct processing infrastructure including additional conveyors and transfer points and other coal handling requirements to cater for the upgraded Washery facility within the existing disturbance footprint of the Springvale Coal Services Site;
 - ❑ Extend and enlarge the existing Reject Emplacement Area (REA) on the Springvale Coal Services Site to enable sufficient reject disposal capacity for a 25 year life;
 - ❑ Construct a private Link Haul Road, approximately 1.3 km in length, linking the Springvale Coal Services Site with the existing private haul road from Angus Place Colliery to Mt Piper Power Station. The private Link Haul Road will cross a section of the existing Pine Dale Mine operation and over the Castlereagh Highway via the construction of a road bridge;
 - ❑ Improve the current water management systems on the Springvale Coal Services Site by separating clean and dirty water streams prior to either reuse or discharge off site;
 - ❑ Integrate the remaining rehabilitation, monitoring, water management and reporting requirements associated with the now closed Lamberts Gully Open Cut Mine which occupies the Springvale Coal Services Site;
 - ❑ Integrate the existing approved transport of coal from Springvale Coal Mine and Angus Place Colliery into the one consent;
 - ❑ Increase the utilisation of the return side of the existing OL system to enable up to 6.3 Mtpa of coal to be delivered to Lidsdale Siding; and
 - ❑ Continue use of all existing approved infrastructure, facilities and activities associated with the transport and processing of coal from each mine gate and the point of delivery to the Springvale Coal Services Site. This infrastructure includes the existing conveyors, private haul roads, Kerosene Vale Stockpile Area, REAs, services, access roads, car parks and buildings.

1.2 Scope

This report has been prepared in response to a request from the Department of Planning and Infrastructure dated 9th October 2013. This letter specifically requests information on issues raised in the EPA and SCA submissions. Following consideration of the submissions, no changes to the design described in the EIS are proposed.

2. Response to Submissions

Detailed responses to each issues raised in the submissions is provided as Appendix A while copies of all submissions are contained as Appendix B. A summary of the issues raised is provided below.

2.1 Summary of Issues

There were 12 submissions on the EIS. Nine submissions were from government agencies, none of which objected to the Project. The Special Interest Organisation and one public submission objected while the second public submission did not object to the Project. A summary of these submissions is provided in Table 1.

A summary of the issues raised is provided in **Table 1** while detailed responses to each are provided in Appendix A.

Table 1. **Summary of Submissions**

Submission	Summary of Issues
EPA	Provided details of required noise criteria and hours of operation as well as suggested consent conditions regarding noise. The EPA raised the issue of low pH seepage from the site which are being investigated by Springvale Coal and advised that any remediation actions will be incorporated into a PRP on the Western Coal Services licence when separated from Springvale Coal's Licence 3607
SCA	Considers that the groundwater assessment requires more data but expects that the expanded monitoring network will provide that data prior to construction. Further water treatment may be necessary.
OEH	Requires a commitment to offset impacts on native vegetation and notes that Delta's proposed ash emplacement is covered by a Biodiversity Offset Management Plan. This plan will be affected by the REA.
DRE	Provided advice on matters to be incorporated into a new Mining Operations Plan specifically for the Western Coal Services Project.
NSW Health	Sought clarification on the air quality methods used in the EIS as well as raised general concerns regarding dust and noise impacts on the health of residents in the vicinity of the project.
DPI Office of Water	Advised that it has no objection to the proposal and provided information on future licensing requirements
NSW Fisheries	Advised that it has no issues
NSW Agriculture	Advised that it has no issues

Submission	Summary of Issues
Forestry Corp NSW	Advised on commercial arrangements should changes be required to any land managed by the Corporation
RMS	Provided design criteria for the overpass and requirements for the necessary Works Authorisation Deed.
Lithgow City Council	Advised of the need for future land access and Voluntary Planning Agreement
Nature Conservation Council	Objected to the project on the grounds of health impacts, noise and dust emissions
Energy Australia	Requested ongoing consultation with Centennial as new land owner for the Pinedale property which will be crossed by the proposed new haul road link
Public Submission	Objected to the project on the grounds that only residents directly impacted by this project are being addressed rather than residents impacted by the other existing operations

Centennial's response to the specific issues raised in the submissions is provided in Appendix A.

The Department of Planning and Infrastructure requested additional information and clarification during its assessment of the EIS. The additional information provided related to the current land zoning for the Springvale Coal Services Site and the land ownership status of properties in the village of Blackmans Flat. The current land zoning information is shown on Figure 2.

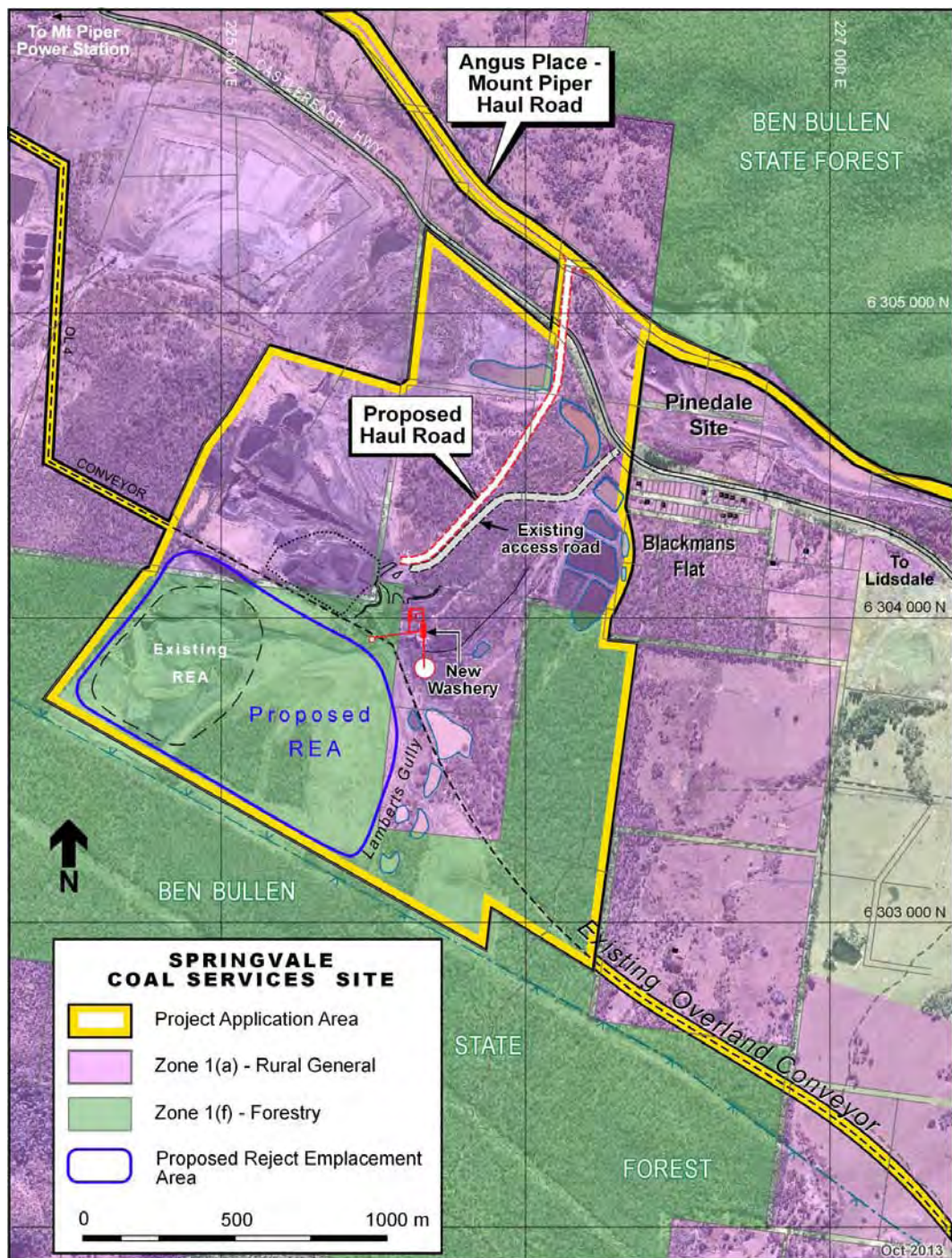


Figure 2 – Land Zoning Springvale Coal Services Site

3. Statement of Commitments

The final Statement of Commitments is provided in following three tables which appear in the EIS as Tables 65, 66 and 67. Modifications from the Statement of Commitments contained in the EIS have been shown in red text.

EIS Table 65 -Existing Management Plans for the Western Coal Services Project

Title	Objectives	Update required after Project Approval
Springvale Coal Services Site Operations		
Rehabilitation and Landscape Plan, Rehabilitation Plan and Closure Plan	Provision of pollution control systems to protect water ways and surrounding ecosystems; Progressive rehabilitation of disturbed areas to a safe and stable landform compatible with the surrounding land uses; Provision of suitable waste management systems; Control of soil erosion; Control of noxious weeds and vermin; The lodgement of security deposits to ensure compliance with conditions and a regular review of these amounts in line with environment liability; and Upon the decommissioning of the site, removal of plant and infrastructure, and making the site safe.	A single Mining Operations Rehabilitation Plan will be prepared for the entire PAA. This Plan will prepared under current DRE guidelines and include component plans as noted in this table
Water Management Plan.	This plan was originally developed under the Lamberts Gully Open Cut approval (PA06_017) and regularly updated. The plan covers progressive upgrading of the water management system at the Springvale Coal Services site through containment of dirty water from disturbed areas, recycling of process water and progressive and improved separation of clean water which passes through the site.	A single Water Management Plan will be prepared for the entire PAA in consultation with the EPA, SCA and NOW as discussed in Table 67 .
Dust Management Plan.	This plan has been developed to monitor the dust emissions from the site. The plan outlines the air quality control measures and management strategies, and the monitoring system in place at the Springvale Coal Services Site.	A single Dust Management Plan will be prepared for the entire PAA in consultation with the EPA as discussed in Table 67 .
Noise Management Plan.	This plan covers the existing Washery operation, reject disposal activities and the previous Lamberts Gully Open Cut.	A single Noise Management Plan will be prepared for the entire PAA in consultation with the EPA as discussed in Table 67 .

Title	Objectives	Update required after Project Approval
Erosion and Sediment Control Plan.	This plan covers earthmoving and vegetation clearing associated with the previous Lamberts Gully Open Cut operation.	A single Erosion and Sediment Control Plan will be prepared for the entire PAA in consultation with the EPA as discussed in Table 67 .
Bushfire Management Plan.	This plan identifies the existing infrastructure that may be at risk from bushfire passing through the adjacent State Forest. The main objective is to establish and maintain a sufficient asset protection zone.	No.
Hazardous Substances Management Plan.	This plan details the existing fuel, oil and chemical storages facilities on site, documents management procedures and provides the MSDS register	No.
Slope Stability Management Plan.	The objective of this plan is to ensure that all slopes created on site are constructed safely. This includes open cut highwall and low walls, road batters, REA emplacements and access ramps.	The Slope Stability Management Plan requires updating to include the new REA and remove aspects relating to the previous open cut operation.
Reject Emplacement Procedure.	This plan provides specific procedures covering the existing disposal of reject in the A Pit REA. The plan includes an inspection regime for pipes, pumps and ponds.	The Reject Emplacement Procedure requires updating to incorporate the new infrastructure.
Existing Haul Roads Operations		
Wallerawang Haul Road Inspection Protocol.	This plan provides for the ongoing inspections of the Wallerawang Haul Road. These inspections cover condition of road surface and drainage provisions.	A consolidated Haul Road Management Plan will be prepared for the entire PAA.
Wallerawang Haul Road Landscape Management Plan.	Prepared in response to the Angus Place project approval (PA 06_0021), this plan provides for the establishment and maintenance of landscaping measures to minimise the visual impact of the haul road, particularly those from residential areas. It also provides for the ongoing maintenance of the landscaping works.	A consolidated Haul Road Management Plan will be prepared for the entire PAA.

Title	Objectives	Update required after Project Approval
Noise Management Plan (Haul Roads).	This plan covers noise monitoring and management procedures covering truck transport to both Mount Piper and Wallerawang Power Stations.	A single Noise Management Plan will be prepared for the entire PAA in consultation with the EPA as discussed in Table 67 .
Kerosene Vale Stockpile Area Operations		
Draft Kerosene Vale Rehabilitation Plan.	This plan provides for the progressive rehabilitation of areas of the Kerosene Vale storage area that are not required for ongoing operations	A single Rehabilitation Plan will be prepared for the entire PAA in consultation with DRE as discussed in Table 67 .

In addition to the above existing plans of management, **Table 66** and **Table 67** from the EIS detail the Statement of Commitments for the Project that Springvale Coal is willing to adopt for implementation throughout the Project development phase and through to the end of the Project life, respectively, should approval be granted under Part 4 of the EP&A Act.

EIS Table 66 - Project Development Phase – Statement of Commitments

Desired Outcome	Action
Development Phase	
All construction operations are appropriately undertaken to minimise potential impacts to the environment.	<p>1.1 Appropriate erosion and sediment control measures will be implemented for construction of the upgrading of the Washery and associated infrastructure (additional conveyors and transfer points on the Springvale Coal Services Site, refer to Figure 8), extension and enlargement of the existing REA, and construction of the Link Haul Road and overpass of the Castlereagh Highway and will be installed prior to commencement of disturbance activities, generally in accordance with the guidelines '<i>Managing Urban Stormwater – Soils and Construction, Volume 2E: Mines and Quarries</i>' (DECC 2008).</p> <p>1.2 A Works Authorisation Deed with RMS will be obtained for the overpass of the Castlereagh Highway prior to construction works within the highway easement.</p> <p>1.3 Prior to construction a CEMP will be prepared for the Springvale Coal Services Site that will be implemented during the construction phase and will include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Noise Management Plan; <input type="checkbox"/> Air Quality Management Plan; <input type="checkbox"/> Site Water Management Plan; <input type="checkbox"/> Groundwater Management Plan; <input type="checkbox"/> Cultural Heritage Management Plan; <input type="checkbox"/> Weed Management Plan; and <input type="checkbox"/> Construction Traffic Management Plan.

EIS Table 67 - Project Operation - Statement of Commitments

Desired Outcome	Action
1. General	
All operations are undertaken in a manner that will minimise the environmental impacts associated with the Project.	1.1 Operations will be undertaken generally in accordance with the description provided in this EIS dated April 2013.
2. Hours of Operation	
All operations are undertaken within the approved operating hours.	2.1 Operations may be undertaken 24 hours a day 7 days a week.
3. Noise and Vibration	
All noise impacts are minimised to the greatest extent possible.	<p>3.1 Removal of the northern two thirds of the existing Co-Disposal REA at the Springvale Coal Services Site within five years of Project Approval.</p> <p>3.2 The construction of the Link Haul Road in the location as depicted in Figure 1.</p> <p>3.3 Material haulage will be managed to maintain compliance with the approved noise criteria on the private Haul Roads.</p> <p>3.4 Reduction of truck movements along Mt Piper Haul Road during prevailing noise enhancing weather conditions in order to meet the nominated Project Specific Noise Criteria. The default level will be zero trucking during these conditions until such time as noise monitoring confirms the truck movements required to meet the Project Specific Noise Criteria during these conditions.</p> <p>3.5 Within 6 months of the date of the Project Approval, A Noise Management Plan will be prepared for the entire PAA. The plan will be prepared in consultation with the EPA. The Noise Management Plan will include the existing monitoring and mitigation strategies contained in the current approved Angus Place Noise Monitoring program, specifically, quarterly inspections of road surfaces, quarterly attended and unattended monitoring to assess compliance and additional noise monitoring in response to noise complaints. The Noise Management Plan will include a protocol for determining the prevailing noise enhancing weather conditions which would trigger reduced transport on the Mt Piper Haul Road.</p> <p>3.6 The following dust mitigation measures will be implemented and will be completed prior to operating the new infrastructure:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Enclosure of the existing and proposed Washery; <input type="checkbox"/> Enclosure of conveyor transfer points; <input type="checkbox"/> Loading of coal rejects from an enclosed bin; <input type="checkbox"/> Majority of coal reclaimed from stockpiles via underground reclaim tunnel; <input type="checkbox"/> Three quarter enclosed conveyors; and <input type="checkbox"/> New Link Haul Road will be fully sealed. <p>3.7 Location of infrastructure as per Figure 8.</p>
4. Air Quality	

Desired Outcome	Action
<p>All air quality impacts are minimised to the greatest extent possible.</p>	<p>4.1 The following dust mitigation measures will be implemented and will be completed prior to operating the new infrastructure:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Enclosure of the existing and proposed Washery; <input type="checkbox"/> Enclosure of conveyor transfer points; <input type="checkbox"/> Loading of coal rejects from an enclosed bin; <input type="checkbox"/> Majority of coal reclaimed from stockpiles via underground reclaim tunnel; <input type="checkbox"/> Three quarter enclosed conveyors; <input type="checkbox"/> Stockpile water sprays which are wind activated; <input type="checkbox"/> New Link Haul Road will be fully sealed; <input type="checkbox"/> Regular use of water carts on unsealed roads trafficked by heavy vehicles. This will include the surface of the proposed REA; and <input type="checkbox"/> Installation of a TEOM continuous atmospheric dust monitoring unit within the Blackmans Flat residential area. <p>4.2 Within 6 months of the date of the Project Approval, an updated Air Quality Management Plan will be prepared for the entire PAA. The plan will be prepared in consultation with the EPA.</p>
5. Surface Water, Groundwater, Geomorphology and Aquatic	
<p>All surface water groundwater and aquatic impacts are minimised to the greatest extent possible.</p>	<p>5.1 Within 6 months of Project Approval a single Water Management Plan will be prepared for the entire PAA and will include operation of the new infrastructure, water recycling system, surface and groundwater monitoring including Wangcol Creek mixing zone and a staged implementation of the separation of the Lamberts Gully drainage line as it passes through the Springvale Coal Services Site as well as the localised changes associated with approved Mt Piper Power Station Ash Emplacement Project.</p> <p>5.2 Within 6 months of the date of the Project Approval apply for any necessary water licenses covering the Springvale Coal Services Site.</p> <p>5.3 Within 5 years of the date of the Project Approval, complete the separation of clean and dirty water at the Springvale Coal Services Site. The design will include the diversion of upstream catchments of Huon Gully around the new REA. The sub-catchment containing the existing A Pit REA (previously the Lambert Gully upstream of the Springvale Coal Services Site Open Cut) as well as the new REA will be diverted into the New Sediment Dam. This sub-catchment currently discharges to Huon Gully without treatment and the staged bypass and therefore the proposed change will lead to improved water quality in Huon Gully. Following remediation of the new REA, this sub-catchment of Huon Gully will be restored.</p> <p>5.4 Construct a staged bypass of the Conveyor Dam and Retention Pond on the Springvale Coal Services Site within 3 years of the date of the consent.</p> <p>5.5 Construct a pollution control pond control runoff from the new REA. This structure will have a capacity of approximately 15 ML and will be located on the north-</p>

Desired Outcome	Action
	<p>eastern corner of the REA. The dam will have a pipe connection to the existing Washery Dam, which is connected to Cooks Dam via a pipeline. This will enable treated stormwater from the new REA to be recycled back to the Washery via Cooks Dam. This dam is to be constructed once the current A Pit REA is completed but prior to the base of the new REA being completed.</p> <p>5.6 Provision of a belt press filter system (or equivalent) to recover water from the tailings produced from the new Washery. This water recovery system will cover tailings produced from the existing Washery but will be installed as part of the construction of the new Washery.</p> <p>5.7 Apply for a separate EPL covering the entire PAA that includes LDP 003 (Kerosene Vale Stockpile Area) and LDP 006 and LDP 007 (conveyor at Duncan Street, Lidsdale).</p> <p>5.8 Within 3 months of completion of the clean and dirty water separation system consent apply to relocate the current LDP006 to the spillway of Cooks Dam and replace the existing LDP006 with a license monitoring point.</p> <p>5.9 Within 6 months of completion of the Link Haul Road, complete the additional riparian planting for a 100 m section of Wangcol Creek downstream of the Link Haul Road crossing. The species selection and density is to be determined in consultation with the SCA and NOW.</p> <p>5.10 Within 12 months of Project Approval, site specific trigger values based on ANZECC 2000 Guidelines will be developed for Wangcol Creek.</p> <p>5.11 To better understand the groundwater linkages, within 12 months of Project Approval, a baseline groundwater monitoring program will be established for the Springvale Coal Services Site. The baseline groundwater monitoring program will include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Quarterly monitoring of water levels from a network of monitoring bores following the completion of construction; <input type="checkbox"/> Six monthly sampling of monitoring bores for field analysis of pH, EC and temperature and laboratory analysis on major ions, pH, EC, TDS, dissolved arsenic, cadmium, chromium, copper, iron, lead, manganese, nickel and zinc; and <input type="checkbox"/> An annual review so that its capacity as an accurate predictive tool can be assessed and maintained.
6. Visual	
All visual impacts are minimised to the greatest extent possible.	<p>6.1 Prior to its completion, the battered slopes of the Link Haul Road overpass bridge will be planted with low maintenance hardy groundcover flowering species.</p> <p>6.2 Staged rehabilitation of the REA will be in accordance with the timeframes provided within the EIS.</p>
7. Aboriginal Heritage Management	
Ensure that identified and unidentified Aboriginal Sites are appropriately managed.	7.1 Within six months of Project Approval, a CHMP will be prepared as part of the ongoing management of the Springvale Coal Services Site. The CHMP which will be developed in consultation with the Aboriginal Stakeholders.
8. Traffic Management	

Desired Outcome	Action
Project-related impacts on the road network are limited.	<p>8.1 The Link Haul Road will be constructed in accordance with AUSROADS Guidelines in consultation with RMS.</p> <p>8.2 All construction sites associated with the infrastructure upgrade prepare and implement a Construction Traffic Management Plan.</p> <p>8.3 Upgrade Springvale Coal Services intersection line-marking to RMS standards.</p>
9. Contamination	
Potential contamination impacts are minimised to the greatest extent possible.	<p>9.1 A Phase 2 Assessment of the entire Springvale Coal Services Site will be conducted before February 2015, in accordance with Springvale Coal's stated commitments to the NSW EPA (letter dated 2 February 2012).</p>
10. Rehabilitation	
Rehabilitation of the Springvale Coal Services Site is conducted in accordance with Industry Standards.	<p>10.1 Within six months of Project Approval a single Rehabilitation Plan will be prepared for the entire PAA in consultation with DRE and DPI and will include the timeframes provided within this EIS, details of the rehabilitation methods, monitoring and reporting framework. Results arising from the implementation of the program will be reported each year in the Annual Review (currently referred to as the AEMR).</p> <p>10.2 The rehabilitation program will include previous commitments from the Lamberts Gully Project Approval (06-0017) including <i>Eucalyptus cannonii</i>.</p>

4. Conclusion

Centennial has reviewed the submissions made to the Western Coal Services Project EIS and where appropriate has included additional matters in the Statement of Commitments. The issues raised have generally been minor and can be accommodated within the proposed management plans that will be prepared prior to construction as well as plans covering the ongoing operation.

There has been no issues raised which has required a modification to the proposed development as detailed in the EIS.

Appendix A – Detailed Response Table

Detailed Response to Submissions

Authority	Issue	Response
EPA	<p>Hours of operation Construction</p> <p>"Construction is restricted to standard hours only except for:</p> <ul style="list-style-type: none"> • Works that comply with the relevant Noise Management Level (NML); • The delivery of materials outside of approved hours as required by Police or other relevant authorities for safety reasons; • Emergencies which are defined as where it is required to avoid the loss of lives, property and/or to prevent environmental harm; • Works that can only take place during a road or rail possession outside of standard construction hours." 	<p>Within 6 months of the date of approval a Noise Management Plan will be prepared for the whole Project Application Area. The Plan will be developed in consultation with the EPA and will include construction hours of operation. The Statement of Commitments (see Chapter 3) has been updated.</p>
	<p>The EPA notes that the proponent states that the facility will operate on a 24 hours a day 7 days a week basis. DPI should ensure that the restrictions on road haulage between Angus Place and Wallerawang Power Station, as discussed in section 3.6 of the EIS), are included as a condition should the Western Coal Services Project if approval is granted.</p> <p><i>The Proponent shall not use the Wallerawang power station haul road at night.</i></p> <p><i>Note: Night is defined as the period from 10pm to 7am on Monday to Saturday, and 10pm to 8am on Sundays and public holidays.</i></p>	<p>Centennial has undertaken to meet project specific noise goals at sensitive residential receptors. The EIS describes the activities that will be undertaken to meet these goals, this includes restricted operating hours under certain weather conditions. Within 6 months of the date of approval a Noise Management Plan will be prepared for the whole Project Application Area. The Plan will be developed in consultation with the EPA and will include, as described in the EIS, the measures that will be taken to ensure compliance with noise goals is achieved at all privately owned residences.</p>
	<p>The EPA consider the PSNL to be generally acceptable, however note that the proponent has used quarterly background noise monitoring data obtained over the period December 2010 to September 2012 at locations S1, S2 and S3, which includes noise emissions from the subject site. The</p>	<p>Centennial is investigating, though the Springvale Section 75W Modification dated September 2013, noise mitigation strategies for the Springvale Pit Top. It is anticipated that through this modification PSNLs for these residences will be derived.</p>

Authority	Issue	Response
	<p>proponent has processed this data to determine the lowest 10th percentile values, which it then considers representative of background noise levels at these locations in the absence of Springvale operations. The use of the lowest 10th percentile value is acceptable provided that data shows Springvale ceased operations (and hence its noise emissions did not contribute significantly to the overall RBL) for 100/0 or more of the monitoring period. The EPA considers that such further information on the operating periods for Springvale Coal Mine is required before it can support this approach.</p>	
	<p>The assessment predicts exceedances of the PSNL that must be addressed by the proponent in accordance with Chapters 8 and 9 of the INP. EPA will then be in a position to recommend noise limits for all residences predicted to receive noise levels up to and including the PSNL. For any other receivers predicted to receive noise levels above the PSNL, DPI is best positioned to weigh the social and economic benefits of the proposal against potential adverse noise impacts and to determine if a higher noise limit is justified. If a higher noise limit is accepted by DPI following this assessment and consent is granted EPA will include these limits in a licence, if one is required.</p>	<p>Exceedences of the PSNL are predicted to occur for some residences within the village of Blackmans Flat. Although not stated in the Noise Impact Assessment, the EIS states that Springvale Coal has developed a strategy to manage the impacts on Blackmans Flat.</p> <p>To date, Springvale Coal has purchased five of nine properties and has written agreements with a further three residents within the Blackmans Flat residential area. Springvale Coal is continuing to negotiate with the remaining resident within the Blackmans Flat residential area.</p>
	<p>The proponent needs to provide in Tables 45 and 46 the predicted noise levels for inversion scenarios.</p>	<p>Tables 45 and 46 of the NIA show predicted operational noise levels at Wolgan Road Residents which are affected by the operation of the haul roads. Predictions under temperature inversions are not provided as there is a commitment to limit trucking during inversion conditions and therefore not applicable.</p>
	<p>The EPA generally supports the components of the proponent's Statements of Commitments for surface water management, as detailed in Part 5 of Table 67</p>	<p>The Statement of Commitments (commitment 5.8) has been revised to reflect that the application to relocate LDP006 will be made within 3 months of completion of the clean and dirty water</p>

Authority	Issue	Response
	<p>of the EIS, with the exception of the commitment to <i>"Within 3 months of consent apply to relocate the current LDP006 to the spillway of Cooks Dam and replace the existing LDP006 with a license monitoring point"</i>. The EPA is not prepared to turn the existing surface water discharge point 'LDP6' in to a monitoring point until there is a complete separation of clean and dirty water at the premises and until the EPA is satisfied that the water quality leaving the site through LOP6 represents the quality of water entering the site and not influenced by the Western Coal Services operations or former mining operations at the premises.</p>	<p>separation system.</p>
	<p>Table 67 of the EIS indicates that the timetable to implement this (separation of water) is 5 years which appears to the EPA to be an excessive timeframe.</p>	<p>There are two main components to the separation of clean water entering the site from the existing dirty water systems at the Springvale Coal Services Site. The first is the engineering works required to convey the water and the second is the rehabilitation of internal site areas which contribute to dirty water runoff. The engineering works will need to be staged but will be substantially complete within 2 years however the establishment of stable vegetation cover which generates clean runoff will take up to 5 years.</p> <p>A set of rehabilitation completion criteria, to be developed in consultation with the EPA and DRE, will be developed and applied to the rehabilitation of the internal site areas.</p>
	<p>The EPA is also aware that surface groundwater seepages are leaving the Western Coal Services site along the Castlereagh Highway frontage, opposite the DML Dam. This matter was brought to the EPA's attention in May 2013 who in turn advised Springvale Coal. This water is characterised by low pH, high electrical conductivity and leaves behind an aluminium rich precipitate. These seepages are</p>	<p>The Springvale Coal Services Site is located within an area of current open cut and historical underground mine workings. As such, surface water and groundwater interactions, and the migration of water through the site, are complex.</p> <p>Springvale Coal commenced an investigation into groundwater migration off site in March 2012. This investigation has included the installation of additional piezometers and ongoing surface</p>

Authority	Issue	Response
	<p>currently being investigated by Springvale Coal and this investigation program and any subsequent remedial actions will need to be incorporated into a PRP on the Western Coal Services licence when separated from Springvale Coal's Licence 3607.</p>	<p>water monitoring. The investigation has identified leakage paths between old underground workings and DML Dam as well as leakage points between DML and Cooks Dams. Additional piezometers are being installed along Wangcol Creek to further examine potential leakage from DML and Cooks Dams.</p> <p>There are 15 groundwater monitoring bores established within and surrounding the Western Coal Services Site. These form part of the ongoing groundwater monitoring program. The bores have been established in a range of strata and ground conditions including open underground workings, solid coal pillars, saturated overburden, unsaturated and dry overburden, Marrangaroo Formation (below the Lithgow Seam, up-gradient and down-gradient of the site. Piezometers have been installed in selected locations where possible and regular data collection and water quality sampling is underway.</p> <p>Centennial is aware of the leakage noted by the EPA and have included this in the investigations. This leakage is very small, investigations are continuing on measures to reduce this flow.</p> <p>A small area from the original Western Main Colliery operation was identified as causing a flow of low pH drainage. This area is located within the area identified for rehabilitation as part of the Project. In order to contain this seepage on site, two sumps equipped with pumps have been installed which return the collected seepage to the dirty water system.</p>
SCA	<p>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</p>	<p>The use of the term "dirty water" to describe the 30% of discharges relates to water discharged from Cooks Dam once the licence has been transferred to this point. This discharge will need to meet the water quality criteria defined in the surface water assessment.</p>

Authority	Issue	Response
	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.	The water referred to as clean represents the water quality above the site within Lamberts Gully. Although this water is generated from Ben Bullen State Forest, its quality will reflect geology, soil and vegetation conditions.
	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.	<p>The surface and groundwater assessments for the Project conclude that Wangcol Creek is a losing system, in that water moving through the site travels below the bed of the creek to the north. This conclusion was based on 3 monitoring locations, and Springvale Coal committed to the installation of additional monitoring bores to extend the monitoring network and confirm the conclusion drawn in the assessment.</p> <p>Additional monitoring bores have been established. There is a total of 15 monitoring bores on and surrounding the SpringvaleCoal Services Site. Ambient water quality within Wangcol Creek along with aquatic ecology assessments were completed as part of the EIS. The Statement of Commitments includes a Water Management Plan that will include provision for the development of site specific trigger values based on the ANZECC 2000 guidelines.</p>
	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	<p>The Springvale Coal Services Site is located within an area of current open cut and historical underground mine workings. As such, surface water and groundwater interactions, and the migration of water through the site, are complex.</p> <p>The amount of modelled increase in groundwater inflow to the surface water system is 4,700 litres per day. The additional contribution from inflows into Cooks and DML dams, although included in the water balance, was negligible in the overall water</p>

Authority	Issue	Response
	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.	<p>balance.</p> <p>Regardless, this amount was included in the Water Balance assessment. The Water Balance showed that the future site water demand of 2.45 ML per day (2,450 m³ per day) would be largely satisfied by a combination of water recycling initiatives and on site storages.</p> <p>Section 9.5.3.6 describes the proposed surface water management and mitigation strategies while Sections 9.5.4 describe the groundwater system and potential impacts. The surface water initiatives include separation of clean and dirty water systems, recycling of dirty water and construction of additional pollution control storage. This new system will provide long term benefits in water quality leaving the Springvale Coal Services Site.</p>
	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.	<p>EIS includes riparian planting along Wangcol Creek. This is to mitigate the clearing associated with the haul road crossing. A significant benefit of the project will be the improvements in the existing water management system on site which in turn will improve water quality in Wangcol Creek.</p> <p>Discussions with the SCA will continue to ensure riparian enhancement of Wangcol Creek is undertaken by Centennial's operations in the area.</p>
	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 EIS acknowledged that Delta Electricity obtained project approval in February 2012 to emplace ash over the area proposed in this Project for reject emplacement. As Springvale Coal is the landholder, Delta Electricity will be required to enter into an agreement with Springvale Coal for the emplacement of ash. To date, no such agreement is in place.

Authority	Issue	Response
OEH	<p>A clear commitment to offset impacts on native vegetation. That the EA include a clear commitment (ie in the Statement of Commitments) to offset the impacts of this proposal on native vegetation as part of a regional offset package for Centennial's operations. OEH is aware that previous consents, including part of the Mt Piper Ash Placement consent (application 09_0186) held by Delta Electricity, apply to parts of the proposed impact area. This includes areas of planted / regenerating vegetation and 10.35ha of MU 37, which is located in Lamberts South within the proposed Reject Emplacement Area (REA) footprint. In the Conditions of Consent for the Mt Piper Ash Placement (09_0186), Delta Electricity is required to develop a Biodiversity Offset Management Plan which includes an offset for direct and indirect impacts of the proposal to maintain or improve biodiversity values. Consistent with Condition B6 of the consent for application 09_0186, Delta Electricity has produced a Biodiversity Offset Management Plan for Lamberts North and a Biodiversity Offset Strategy Outline for Lamberts South.</p>	<p>Centennial has made a commitment to include this project in the proposed regional biodiversity offset strategy which is being developed in consultation with OEH.</p>
	<p>That impacts on native vegetation be clearly quantified in such a way that they can be included as part of the overall offset calculations for such a regional offset package.</p>	<p>The Project will involve the removal of approximately 10.5 ha Cocks Permian Red Stringybark - Brittle Gum Woodland. Less than 0.3 ha will be cleared during construction of the haul road line while the remaining will be disturbed at around year 10 of the REA development. This vegetation community is not listed as an EEC, is fragmented and disturbed. The majority of the vegetation to be cleared by the project consists of planted vegetation following previous open cut mining.</p>
	<p>A more detailed assessment of the values of planted / rehabilitated vegetation. That the age and species</p>	<p>The vegetation surveys contained in the EIS included targeted surveys of the rehabilitation areas at Springvale Coal Services</p>

Authority	Issue	Response
	comprising Planted Regenerating Vegetation be identified, and this community's habitat values be considered as part of the biodiversity assessment for the project.	Site. The oldest vegetation is 6 years having been sown in 2007. The youngest vegetation is less than 3 years old. The Lamberts Gully Open Cut rehabilitation areas were surveyed as part of the EIS studies and the results contained in the Ecological Assessment. The results were presented on the basis of vegetation community type, habit value and then assessment of impacts on individual rare and endangered species. A description was provided for each vegetation community type and dominant species, including the rehabilitation areas. A complete species list was not provided for any identified community but rather a combined species list was provided as an appendix.
	Inclusion of the proposed water management system for the Western Coal Services Project in the Regional Water Strategy.	<p>In Section 4.3.5 of the EIS, is the following statement: <i>There is also the provision for a water supply pipeline from the Springvale Coal Mine to the Springvale Coal Services Site running along the OL structure approved under consent 11/92 for the Springvale Coal Mine. This pipeline was approved at a diameter of 100 mm but will be installed under this approval at a diameter of 150 mm. The pipeline will also be extended to the Lidsdale Siding on the same conveyor.</i></p> <p>The water management system at the Springvale Coal Services Site is a discrete system contributing low volumes of water to the regional catchment.</p>
DRE	Reduce time to prepare regional rehabilitation strategy from 6 months to 3 months	The Statement of Commitments refers to the preparation of a single rehabilitation plan covering the entire PAA, not a regional rehabilitation strategy. Centennial believe that the proposed 6 month timeframe for the rehabilitation plan covering the components of the PAA is appropriate given the complexity of the task and consultation required.
	Prepare separate MOP for Western Coal Services	The Statement of Commitments has been updated to include a commitment to prepare a separate Mining Operations Plan for the Western Coal Services Project.

Authority	Issue	Response
	Retention of haul roads and link roads following project completion requires approval of third parties including ongoing maintenance. These should be removed unless responsibility by another party is demonstrated	The removal of these roads is included in the current security provision held by Springvale Coal and Angus Place Colliery. The security for the removal of this infrastructure at the end of Project life will be transferred to the Western Coal Services Project and accounted for in the Project's Mining Operations Plan. Regardless, it is likely that, at the end of the Project life, this infrastructure will be considered strategic for the regions road network. As such, the retention of these roads is considered appropriate as a final land use. Springvale Coal understands that should these roads not be required for some reason in future then they will need to be removed.
	Areas related to the Delta Electricity Ash Emplacement and the Lithgow City Council (LCC) Municipal Waste Emplacement are excluded from proposed rehabilitation activity. The statement on page 42 of the EIS is that ""these areas have already been completed to the requirements of both Delta Electricity and LCC and no further work is proposed". DRE does not believe that this statement has been clearly demonstrated to the point where rehabilitation of these areas can be excluded from the project. As such, the forthcoming RMP/MOP must cover the rehabilitation of these areas unless a clear and legally binding transfer of land management responsibility and rehabilitation has been demonstrated.	The rehabilitation of this land will be included in the Mining Operations Plan for the Project until such time as Delta Electricity and/or Lithgow City Council exercise their landholder rights to use the land for an alternative purpose.
	Figures 13 to 16 within the EIS show the REA extending onto land owned by Delta. The acceptance of this arrangement by Delta needs to be demonstrated.	The requirement to enter into a commercial arrangement with a third party is included in the EIS.
	Species list for rehabilitation to be provided in MOP	The Statement of Commitments has been updated to include a commitment to prepare a separate Mining Operations Plan for the Western Coal Services Project.
	'Potential Industrial Land Use' compared with DRE	The rehabilitation of this land will be included in the Mining

Authority	Issue	Response
	suggested "Forest Ecosystem" must be addressed in the forthcoming RMP/MOP.	Operations Plan for the Project, however, it is likely that, at the end of the Project life, the Springvale Coal Services Site will be considered strategic industrial land for the region (as is currently provided for in the Draft Lithgow Local Environment Plan). As such, an Industrial Land Use is considered appropriate as a final land use.
	Existing Rehabilitation at Kerosene Vale has not had DRE signoff	The Statement of Commitments has been updated to include a commitment to prepare a separate Mining Operations Plan for the Western Coal Services Project, including the Kerosene Vale Coal Stockpile Site.
	No mention of recovering soil and vegetation resources when clearing existing rehabilitation	Section 5.8 of the EIS states that: <i>Although there is no remaining original natural topsoil on site, the REA will be developed on rehabilitated land previously disturbed by the Lamberts Gully Open Cut Mine. As the footprint of the REA expands, the surface topdressing and suitable underlying overburden material will be stripped and used either directly on completed emplacement batters, or to construct the drainage embankment around the ultimate footprint of the REA. Approximately 150,000 m³ of topdressing material will be required to rehabilitate the ultimate surface of the REA. A further 18,000 m³ will be required for topdressing the Co-Disposal area, while miscellaneous areas will take another 2,000 m³. This represents less than 30 cm depth to be stripped from the base of the future REA.</i>
	Topdressing sourced from the drainage embankment around the REA must not compromise stability or water management in this area	The drainage embankment will be a purpose built structure designed to allow recovery of the material at later stages of the REA rehabilitation. This will not compromise either the water management system nor the stability of the finished REA profile.
	Recommends that the top of the REA not be flat	The Statement of Commitments has been updated to include a commitment to prepare a separate Mining Operations Plan for the Western Coal Services Project
	No soil cover depth has been specified	The calculated volumes of material provided in the EIS were based on 20 cm average cover
	Current slope of the Co disposal area is greater than	The Statement of Commitments has been updated to include a

Authority	Issue	Response
	1 in 3. This should be reduced to 1 in 3 at the time of project completion unless stability confirmed	commitment to prepare a separate Mining Operations Plan for the Western Coal Services Project
	A back up plan is needed for DML and Cooks Dam in the event that either Delta Electricity or LCC do not formally accept responsibility	These dams will either be used by third parties or remain for wildlife refuges at the end of mine life. The rehabilitation of these dams will be included in the Mining Operations Plan for the Project until such time as Delta Electricity and/or Lithgow City Council exercise their landholder rights to use the land for an alternative purpose
	MOP to include a plan showing titles with surface and sub surface entitlements	The Statement of Commitments has been updated to include a commitment to prepare a separate Mining Operations Plan for the Western Coal Services Project
	Suggested conditions relating to rehabilitation including objectives to be contained in the approval	No response required.
NSW Health	It is noted that the comment on how existing PM2.5 levels were estimated has been addressed. However it is unclear why Bathurst data was used for estimating background levels of PM2.5 and PM10.	There are two components to the atmospheric model, the first is a program called CALMET which is used to determine three dimensional atmospheric conditions while the second is CALPUF which is a three dimensional dispersion model used to assess the impacts of the project on local air quality. Observed hourly data from the Pine Dale Automatic Weather Station (AWS), Lidsdale AWS, Springvale AWS, BoM Bathurst Airport AWS and BoM Mount Boyce AWS were used as input for CALMET. This data provided an accurate reflection of local weather patterns. Determining background dust levels used gauges located at Springvale, Angus Place, Pinedale and the NSW TEOM site at Bathurst. The Bathurst site was used to determine PM2.5 micron dust levels because this is the only site that had a continuous set of both PM10 and PM2.5 with the most recent complete data set being for the year 2011. Bushfires around Bathurst in mid 2011 resulted in significantly higher PM10 and PM2.5 data which provided for a conservative assessment of background dust levels. Although the Air Quality Impact Assessment discussed that locally derived data shows consistently lower levels of atmospheric dust (Section 5.3.5), conservative data was used for the purposes of impact

Authority	Issue	Response
		assessment.
	The assessment proposes individual agreements with residents at Blackmans Flat; however, more detail should be provided about whether building treatment or acquisition is being considered as an option. We understand that individual agreements are confidential, but it would be useful to know what options residents are being offered as these will have long-term impacts on their health.	<p>The EIS states that Springvale Coal has developed a strategy to manage the impacts on Blackmans Flat.</p> <p>To date, Springvale Coal has purchased five of nine properties and has written agreements with a further three residents within the Blackmans Flat residential area. Springvale Coal is continuing to negotiate with the remaining resident within the Blackmans Flat residential area.</p>
	The EIS outlines the approach to assessing potential sleep disturbance according to the NSW EPA Industrial Noise Policy, however the report then refers to use of alternative sleep disturbance criteria such as the NSW Road Noise Policy (RNP), which are not as stringent. The use of alternative sleep disturbance criteria to develop alternative project specific noise goals is not supported.	Although alternative sleep disturbance criteria was discussed, the lower values provided in the NSW Industrial Noise Policy (INP) was used in the assessment. Other awakening reactions described in the NSW Road Noise Policy were considered as these are not described in the INP and for completeness were included in the assessment.
	The EIS noted in the overview of key findings (Appendix 7 Social Impact Assessment) that conventional measures to reduce the impacts (noise, visual and dust) will not address the cumulative impacts that have occurred over many years, and future zoning of Blackmans Flat will need to recognise dominant land use.	<p>The EIS states that Springvale Coal has developed a strategy to manage the impacts on Blackmans Flat.</p> <p>To date, Springvale Coal has purchased five of nine properties and has written agreements with a further three residents within the Blackmans Flat residential area. Springvale Coal is continuing to negotiate with the remaining resident within the Blackmans Flat residential area.</p>
DPI – Office of Water	NSW Office of Water advised that it has no objection to the proposal	No response required
	the Office appreciates the proponent's commitments in relation to water management, in particular the commitment to upgrade the existing site water management plan to incorporate the proposal. These commitments are considered adequate to address the potential impacts to water resources arising from	No response required

Authority	Issue	Response
	the proposal.	
	the proponents should note that the interception of groundwater by the existing DML and Cook's Dams may require licensing within the Sydney Basin Coxs River Groundwater Source under the <i>Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources</i> , unless considered exempt. The proponents should consult with the Office of Water to determine any licensing requirements. A list of general licensing requirements was provided.	The Statement of Commitments has been updated to include a commitment to obtain the relevant water licenses. Consultation with the NOW has commenced.
Fisheries NSW	Fisheries NSW advises no issues	No response required
Agriculture NSW	Agriculture NSW advises no issues	No response required
Forestry Corporation of NSW	Western Coal Services should recognize the tenure of land as State Forest managed by Forestry Corporation of NSW (FCNSW)	No response required
	Should the proposal require modification of surface infrastructure please note that the company must enter a compensation agreement with FCNSW to compensate for disruption to forestry activities, use of forestry roads and loss of revenue from the removal of timber or other forest values.	No response required
RMS	The design and construction of the overpass of the Castlereagh Highway will be administered through a Works Authorisation Deed entered by the proponent with Roads and Maritime. The Deed will provide for the specifications to be met in the design and construction of an overpass following consultation with the Roads and Maritime Project Services Manager.	Centennial will continue to liaise with RMS and enter into a Works Authorisation deed with RMS prior to the construction of the haul road link across the Castlereagh Highway.
LCC	The use of Council's land is acceptable subject to continued consultation and negotiation with Council. Commercial considerations would be required which	No response required

Authority	Issue	Response
	could be accommodated within a Voluntary Planning Agreement	
	Noise assessment shows 11 out of 16 receptors at Blackmans Flat will not meet the noise criteria however only one negotiated agreement will be arranged	<p>The EIS states that Springvale Coal has developed a strategy to manage the impacts on Blackmans Flat.</p> <p>To date, Springvale Coal has purchased five of nine properties and has written agreements with a further three residents within the Blackmans Flat residential area. Springvale Coal is continuing to negotiate with the remaining resident within the Blackmans Flat residential area.</p>
	Council requests that the construction earthworks/mounds for the bridge over the Castlereagh Highway be revegetated as soon as practicable	<p>The Statement of Commitments, Table 67 of the EIS, states that:</p> <p><i>Prior to its' completion, the battered slopes of the Link Haul Road overpass bridge will be planted with low maintenance hardy groundcover flowering species.</i></p>
	All new buildings will require construction certificates	The Statement of Commitments has been updated to include a commitment to obtain construction certificates for new buildings.
	Use of the existing onsite sewage management system needs to be justified. An assessment by a qualified person to advise Council that the existing system can handle the proposed loadings adequately.	<p>Section 9.5.3.6 of the EIS states that:</p> <p><i>The biocycle sewerage system on site was constructed with sufficient capacity for the former Lambert Gully Open Cut and therefore does not require upgrade.</i></p> <p>The project will involve increasing the current employee numbers from 15 to 18 which is significantly lower than the previous employment levels on site.</p>
	Council requests that at VPA be negotiated	Consultation with Lithgow City Council regarding a regional approach to a Voluntary Planning Agreement is ongoing.
NCC	Health impacts According to the Western Coal Services Project EIS, there could be gross exceedances of the National standards for PM10 and PM2.5 at sites such as WR1 and WR2.	Section 9.5.2.4 states that under worst case scenarios for the two Wolgan Roads residences the 50 ug/m ³ criterion for 24 hour average PM10 concentrations will be exceeded on two occasions each year. Given the small number of predicted exceedances these are able to be effectively managed. The mitigation strategies are detailed in Section 9.5.2.5.
	Concerns raised regarding water quality	Surface water management and mitigation strategies are

Authority	Issue	Response
		provided in Section 9.5.3.6 of the EIS. The results of these measures would lead to an improvement in water quality leaving the site.
	This project could result in the quadrupling of heavy coal truck movements along the Coal Link Angus Place to Mt Piper Haul Road that would create noise and lighting issues for local residents.	Section 1.1.3 and figure 2 of the EIS describes coal inputs, with the supply from Angus Place being 4 Mtpa in accordance with SSD 12_5602. The Project does not seek to increase the production from source mines
Energy Aust	Requests ongoing consultation with Centennial	No comment required
Private	Complaint regarding the relocation of only the residents impacted by this individual project rather than residents impacted by other projects in the vicinity	No comment required

Appendix B – Copies of Submissions



Our ref:

Mr Lyndon Bryant
Project Manager, Western Operations
Springvale Coal Pty Limited
PO Box 198
WALLERAWANG NSW 2845

Dear Mr Bryant

**Western Coal Services Project (SSD-5579)
Response to Submissions**

The Department has provided you with the submissions received during the exhibition of the EIS for the Western Coal Services Project.

The Director-General requests that you prepare responses to the issues raised in submissions. In particular, please provide information on the extent and proposed management of acidic drainage from the site that is identified in the EPA's submission and also provide additional groundwater monitoring data, as requested in the SCA's submission. Please provide your responses by 31 October 2013.

If you wish to discuss the matter further, please contact Colin Phillips.

Yours sincerely

Howard Reed

9.10.13

Manager, Mining Projects

As the Director-General's nominee



Department of Primary Industries

OUT13/29565

- 9 OCT 2013

Mr Brendan Liew
Mining Projects
NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

brendan.liew@planning.nsw.gov

Dear Mr Liew,

**Centennial Western Coal Services Project (SSD 5579)
Response to exhibition of Environmental Assessment**

I refer to your email dated 20 August 2013 requesting advice from the Department of Primary Industries in respect to the above matter.

Comment by NSW Office of Water

The NSW Office of Water advises:

- (i) no objection to the proposal.
- (ii) the Office appreciates the proponent's commitments in relation to water management, in particular the commitment to upgrade the existing site water management plan to incorporate the proposal. These commitments are considered adequate to address the potential impacts to water resources arising from the proposal.
- (iii) the proponents should note that the interception of groundwater by the existing DML and Cook's Dams may require licensing within the Sydney Basin Coxs River Groundwater Source under the *Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources*, unless considered exempt. The proponents should consult with the Office of Water to determine any licensing requirements. A list of general licensing requirements is provided for information at Attachment A.

For further information please contact Rohan Macdonald, Water Regulation Officer, Major Projects (Newcastle office) on 4904 2642, or at: rohan.macdonald@water.nsw.gov.au.

Comment by Fisheries NSW

Fisheries NSW advise no issues.

For further information please contact David Ward, Fisheries Conservation Manager (Tamworth office) 6763 1255, or at: david.ward@industry.nsw.gov.au.

Comment by Agriculture NSW

Agriculture NSW advises no issues.

For further information please contact Wendy Goodburn, Resource Management Officer (Goulburn office) on 4828 6635, or: wendy.goodburn@industry.nsw.gov.au.

State Forest land

As advised in this Department's letter of 24 June 2013, State Forests are now managed by Forestry Corporation of NSW, a separate government entity. As such, no advice as to State Forest issues are included here and contact should be made direct with that Corporation.

A relevant contact officer for this region is Melanie Dyne, Programs Officer (Bathurst Office) on 6331 2044 or at melanie.dyne@fcnsw.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Phil Anquetil', with a stylized flourish at the end.

Phil Anquetil
Executive Director Business Services

Attachment A

Centennial Western Coal Services Project (SSD 5579) Response to exhibition of EIS

General licensing requirements under the *Water Management Act 2000* (WMA)

- An Access Licence nominated to a water supply work is required to take from any water source managed under the WMA. (Relevant water sources: Sydney Basin Cocks River Groundwater Source of the *Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources* and Upper Nepean and Upstream Warragamba Water Source of the *Water Sharing Plan for the Greater Metropolitan Region Unregulated River Water Sources*).
- Exemptions for access licences are provided in Clause 18 and the Schedule 5 of the *Water Management (General) Regulation 2011*. Refer:
<http://www.legislation.nsw.gov.au/maintop/view/inforce/subordleg+469+2011+cd+0+N>
- Section 54 of the WMA provides details on harvestable rights.
- Requirements for access licence dealings are provided in the following documents:
 - Section 71 of WMA
 - the Access Licence Dealing Principles, refer:
<http://www.legislation.nsw.gov.au/maintop/view/inforce/subordleg+433+2004+cd+0+N>
 - Part 12 of the Water Sharing Plan, refer:
<http://www.legislation.nsw.gov.au/viewtop/inforce/subordleg+111+2011+cd+0+N>

Application forms for access licence and access licence dealings are available at:
<http://www.water.nsw.gov.au/Water-licensing/Applications-and-fees/Applications/default.aspx>

End Attachment A



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

Attention: Mr Colin Phillips
Email: Colin.Phillips@planning.nsw.gov.au

Dear Mr Reed

**Review of Environmental Impact Statement
Western Coal Services Project**

I refer to your recent request for Trade & Investment, Division of Resources and Energy (DRE) to review and provide comments on the proposed Western Coal Services Project Environmental Impact Statement (EIS).

Project Summary

The Western Coal Services Project is located approximately 4 kilometres north west of Lidsdale and will cover a 25 year period.

The Project covers the ongoing operation of the following sites;

- the Springvale Coal Services site (including the former Lamberts Gully Open Cut mine);
- the Wallerawang Haul Road;
- the Mt Piper Haul Road;
- the Springvale Overland Conveyor system (connecting Springvale Colliery, Mt Piper Power Station, Wallerawang Power Station, the Springvale Coal Services Site and the Lidsdale Siding), and;
- the Kerosene Vale Stockpile Area.

The project also covers the following activities;

- the expansion of the Springvale Coal Services Site Washery and associated infrastructure – through the construction of a new washery to operate in tandem with the existing washery - which will increase total capacity of the washery to 7Mt per year (up from 2Mt per year) and the total site capacity to 9.5Mt per year;

- extension and enlargement of the current Reject Emplacement Area (REA) to cover a 25 year period, with total reject production of up to 25Mt and a size of approximately 1000 metres long, 700 metres wide and 70 metres high;
- a new haul road link of 1.3 kilometres in length connecting the Angus Place Haul Road with the Springvale Coal Services Site;
- upgrades to the site water management system at the Springvale Coal Services Site including a perimeter drain around the REA, a new 15ML pollution control dam and improved differentiation of the clean and dirty water systems;
- continued operation of infrastructure, facilities and activities, and;
- ongoing rehabilitation, monitoring, water management and reporting.

Construction will take place over a 12 to 18 month period.

DRE has reviewed the EIS and provide the following comments on issues and activities related to its areas of responsibility.

Rehabilitation & Mine Closure

Mining Operations Plan/ Rehabilitation Management Plan

A Rehabilitation and Landscape Plan has been prepared for the Springvale Coal Services Site and a Draft Kerosene Vale Rehabilitation Plan has been prepared for the Kerosene Vale site.

A single Rehabilitation Plan is proposed for the Project Application Area, to be developed within 6 months of the project approval. DRE supports this proposal, but recommends a reduced time period for Plan preparation of 3 months from the project approval. This can be extended if the proponent is unable to meet this timeframe.

The proposed Rehabilitation Plan should be prepared in accordance with the current DRE Mining Operations Plan guidelines dated September 2013. It would be expected that this Rehabilitation Management Plan/ Mining Operations Plan (RMP/MOP) would replace the Rehabilitation and Landscape Plan for the Coal Services Site and would either replace the Kerosene Vale Rehabilitation Plan or have it included as an attachment.

Separate MOPs would be required for the Western Coal Services Project, the Springvale Colliery and the Angus Place Colliery. It should be noted that at present the Coal Services Site and the Springvale Colliery are combined in a single MOP and the Kerosene Vale site is covered within the Angus Place Colliery MOP.

Retention of Haul Roads

The EIS indicates the new link haul road will be retained as part of the existing road network (Figure 11 and Section 5.5.8) following project completion. This proposal needs to be accepted by another party, including a commitment for ongoing maintenance, otherwise the haul road and bridge should be removed. Unless future responsibility by another party is demonstrated, the removal must be considered and documented in the forthcoming RMP/MOP.

Rehabilitation of areas owned by Delta Electricity and Lithgow City Council

Areas related to the Delta Electricity Ash Emplacement and the Lithgow City Council (LCC) Municipal Waste Emplacement are excluded from proposed rehabilitation activity. The statement on page 42 of the EIS is that "...these areas have already been completed to the requirements of both Delta Electricity and LCC and no further work is proposed". DRE does not believe that this statement has been clearly demonstrated to the point where rehabilitation of these areas can be excluded from the project. As such, the forthcoming RMP/MOP must cover the rehabilitation of these areas unless a clear and legally binding transfer of land management responsibility and rehabilitation has been demonstrated.

Figures 13 to 16 within the EIS show the REA extending onto land owned by Delta. The acceptance of this arrangement by Delta needs to be demonstrated.

Vegetation Species to be used in Rehabilitation

It is noted that no rehabilitation species list has been provided and that Figure 21 identifies a land cover of "Native vegetation suitable for reject emplacement". The species used in the rehabilitation program will need to be provided in the forthcoming RMP/MOP and the species used should aim to re-establish some of the threatened species identified in Section 9.5 of the EIS.

The proposed vegetation species used should be determined in consultation with and to the satisfaction of Forests NSW, Office of Environment and Heritage and DRE.

Post Mining Land Use – Potential Industrial Land Use

Figure 21 shows a post closure land use as 'Potential Industrial Land Use'. While this may be a realistic post mining land use for this area, DRE recommends that the land use of "Forest Ecosystem" apply to this area in the event that an industrial land use is not determined to be appropriate at mine closure. This must be addressed in the forthcoming RMP/MOP.

Kerosene Vale Stockpile – Existing Rehabilitation

The Rehabilitation Status for the Kerosene Vale Stockpile Area figure (Figure 10) shows an area of 'Existing Rehabilitation', but this has not been signed off by DRE as further action is required. It is also noted that further works will be required to permanently seal disused mine entries located on this site. This will need to be included in the forthcoming RMP/MOP.

Recovery of Soil Resources and Vegetative Material from Reject Emplacement Area Construction

With regard to construction of the REA (Domain 2) it is noted that a significant area of former rehabilitation will need to be destroyed to permit this construction. There is no mention in the EIS of recovering soil resources and vegetative material from these rehabilitation areas. It is recommended that a condition of the Development Consent requires that soil resources and vegetative material impacted by construction of the REA must be recovered, appropriately managed and used effectively in the rehabilitation program.

Reject Emplacement Area – Drainage Embankment Removal

It is noted that topdressing material for the washery and coal handling area will be sourced from the drainage embankment around the REA (page 41 of the EIS). It is essential that this does not affect the long term stability of the REA or compromise the water management system in this area. This needs to be covered in more detail in the forthcoming RMP/MOP.

Reject Emplacement Area - Final Landform

DRE notes that the REA Cross Sections (page 53 of the EIS) show an extensive flat surface. This is not a landscape consistent with the pre-mining landform which is predominantly undulating hills. A more natural landform would be more appropriate for this area. However, it is noted in the visual impact section of the EIS that the flat top, minimising total height, may reduce visual impacts from certain vantage points (page 187). It is recommended that the final landform of the top of the REA be reconsidered in the forthcoming RMP/MOP.

It is also noted that no soil cover depth for the REA is specified. This will also need to be addressed in the forthcoming RMP/MOP.

Co-disposal Area – Final Landform

Although not specified in the EIS, DRE understands (from site visits) that the current slope of the co-disposal area outer embankments are greater than 1 in 3. The EIS does not propose any action to reduce the slope of these embankments, potentially affecting both long term stability and visual impacts. A reduced slope for these embankments to a slope of no greater than 1 in 3 should be required at the time of project completion unless information is provided to confirm the existing landform is geotechnically stable, is acceptable to the landowner and is supporting a sustainable ecosystem.

Retention of Cooks and DML Dams

With regard to the Cooks and DML dams (Domain 4), the proposed retention of dams is acceptable provided these dams are required for future usage by LCC and/or Delta Electricity and that ongoing responsibility for these dams has been formally accepted by the relevant landowner. A back up rehabilitation plan needs to be developed in case these are not required at the time of project completion.

Mining Titles

The mining titles that cover this project area are identified in the EIS and shown on Figure 6. DRE considers that it is essential for the forthcoming RMP/MOP to provide a clear indication of which areas are covered by surface leases only, surface and subsurface leases, and lands within the project area which are not covered by mining tenements, particularly at the Kerosene Vale and Coal Services sites

Recommended Conditions of Approval

DRE recommends that the following conditions be incorporated into the Development Consent, if granted:

Rehabilitation Objectives and Commitments

The Proponent shall rehabilitate the site to the satisfaction of the Director, Environmental Sustainability of Trade & Investment DRE.

Rehabilitation must be substantially consistent with the Rehabilitation Objectives described in the EIS, the Statement of Commitments outlined in Chapter 10, Tables 65, 66 and 67 and the following objectives in Table DRE1.

Table DRE 1

Rehabilitation Feature	Objective
Mine site (as a whole of the disturbed land and water)	Safe, stable and non-polluting, fit for the purpose of the intended post-mining land use(s).
Rehabilitation materials	Materials (including topsoils, substrates and seeds of the disturbed areas) are recovered, appropriately managed and used effectively as resources in the rehabilitation.
Landforms	<p>Final landforms sustain the intended land use for the post-mining domain(s).</p> <p>Final landforms are consistent with and complement the topography of the surrounding region to minimise the visual prominence of the final landforms in the post mining landscape.</p> <p>Final landforms incorporate design relief patterns and principles consistent with natural drainage.</p>
Water Quality	<p>Water retained on site is fit for the intended land use(s) for the post-mining domain(s).</p> <p>Water discharged from site is consistent with the baseline ecological, hydrological and geomorphic conditions of the downstream creeks prior to mining disturbance.</p> <p>Water management is consistent with the regional catchment management strategy.</p>
Native flora and fauna habitat and corridors	<p>Size, locations and species of native tree lots and corridors are established to sustain biodiversity habitats.</p> <p>Species are selected that re-establishes and complements regional and local biodiversity.</p>

Progressive Rehabilitation

The proponent shall carry out all surface disturbing activities (eg pre-stripping in advance of mining operations) in a manner that, as far is reasonably practicable, minimises potential for dust emissions and shall carry out rehabilitation of disturbed areas progressively, as soon as reasonably practicable, to the satisfaction of the Director Environmental Sustainability in DRE.

Rehabilitation Plan

1. The Proponent must prepare and implement a Rehabilitation Plan to the satisfaction of the Director Environmental Sustainability of the DRE.
2. Rehabilitation Plan must:
 - a. be submitted and approved by the Director Environmental Sustainability prior to carrying out any surface disturbing activities of the development, unless otherwise agreed by the Director General of the Department of Planning and Infrastructure (DP&I);
 - b. be prepared in accordance with DRE guidelines and in consultation with DP&I, OEH, EPA, Forests NSW, NOW, Lithgow City Council and the Community Consultative Committee.;
 - c. incorporate and be consistent with the rehabilitation objectives in the EIS, the statement of commitments and Table DRE 1;
 - d. integrate and build on, to the maximum extent practicable, the other management plans required under this approval; and,
 - e. address all aspects of mine closure and rehabilitation, including post mining land use domains, rehabilitation objectives, completion criteria and rehabilitation monitoring and management.

Note: The approved Mining Operation Plan (which will become the REMP once the Mining Act Amendments have commenced), required as a condition of the Mining Lease(s) issued in relation to this project, will satisfy the requirements of this condition for a Rehabilitation Plan.

Summary

DRE supports the project as outlined in the EIS. The project will increase efficiency and flexibility of the coal processing and distribution network utilised by Springvale Coal & Centennial Coal. The project is seen to be an important component in the effective operation of other sites, specifically Angus Place Colliery, Springvale Colliery, Wallerawang Power Station, Mt Piper Power Station and the Lidsdale Siding, as well as potential future coal mines in the area.

The environmental impacts of the project appear to be far outweighed by the economic and employment benefits which will be provided, particularly as the majority of areas covered by the project are already disturbed or established. In addition, Water Management at the Springvale Coal Services Site will be upgraded and improved, reducing the risk of pollution discharges from this site.

From DRE's perspective, any deficiencies noted in the EIS can be adequately addressed in the forthcoming RMP/MOP

Should you have any enquires regarding this matter please contact Vince Fallico, Project Officer, Industry Coordination on (02) 8281 7340.

Yours sincerely



**ADRIAN DELANY
ACTING DIRECTOR
INDUSTRY COORDINATION**

8.10.13



Our reference: EF13/3625: DOC13/66173
Contact: Andrew Helms (02) 6332 7604

Director, Mining Projects
Development Assessment Systems & Approvals
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Mr Brendan Liew

8 October 2013

Dear Mr Kitto

WESTERN COAL SERVICES – SSD-5579

I refer to an email from the Department of Planning and Infrastructure (DPI) dated 20 August 2013 seeking comments on Springvale Coal Pty Limited's proposed development application for the Western Coal Services project located on the Castlereagh Highway, Blackmans Flat.

The Environment Protection Authority (EPA) has reviewed the Environmental Impact Statement (EIS) associated with this project. Please find the assessment of impacts of the project and the recommendations of the EPA in Attachment 1. If the DPI determines the project application by granting consent, the EPA recommends that the conditions provided within Attachment 1 be incorporated into the consent, however, please note the EPA recommends that further information is required in relation to the potential noise impacts of the facility.

It is noted that the facility is currently licensed by the EPA under the *Protection of the Environment Operations Act 1997* (licence No. 3607) and shares this licence with Springvale Colliery. In the event that the project is approved by DPI the proponent will need to make an application to the EPA for a separate Environment Protection Licence for the Coal Services Site that incorporates the relevant conditions of the planning approval. Centennial Coal will also be required to submit applications to the EPA to vary the Environment Protection Licences for Springvale Colliery and Angus Place Colliery to remove those components of those facilities that are proposed to be captured by the Western Coal Services project.

Should you have any enquiries regarding this matter please contact Andrew Helms at the EPA's Central West (Bathurst) Office by telephoning (02) 6332 7604.

Yours sincerely

A handwritten signature in black ink, appearing to read 'SL', written over a horizontal line.

SHERIDAN LEDGER
A/Manager Central West
Environment Protection Authority

Attachment 1 EPA comments and recommended conditions of project approval

ATTACHMENT 1 – COMMENTS/RECOMMENDED CONDITIONS OF APPROVAL

Hours of Operation:

Construction

Any approval needs to include the following conditions:

- “Construction is restricted to standard hours only except for:
 - Works that comply with the relevant Noise Management Level (NML);
 - The delivery of materials outside of approved hours as required by Police or other relevant authorities for safety reasons;
 - Emergencies which are defined as where it is required to avoid the loss of lives, property and/or to prevent environmental harm;
 - Works that can only take place during a road or rail possession outside of standard construction hours.”
- “Noise impacts exceeding the relevant NML during standard construction hours and during road or rail possessions outside of standard construction hours are to be managed in accordance with an appropriate Construction Noise Management Strategy.”

Operation

The EPA notes that the proponent states that the facility will operate on a 24 hours a day 7 days a week basis. DPI should ensure that the restrictions on road haulage between Angus Place and Wallerawang Power Station, as discussed in section 3.6 of the EIS), are included as a condition should the Western Coal Services Project if approval is granted.

These restrictions are contained in condition 19 of Project Application approval 06_0021 which states:

Operating Hours – Wallerawang Power Station Haul Road

19. The Proponent shall not use the Wallerawang power station haul road at night.

Note: Night is defined as the period from 10pm to 7am on Monday to Saturday, and 10pm to 8am on Sundays and public holidays.

Noise

The EPA has reviewed the noise assessment ‘Centennial Western Coal Services Project – Noise and Vibration Impact Assessment’ prepared by SLR Consulting Pty Ltd (Ref 630.10123.00500R2 dated 24 July 2013).

The proponent has adopted $L_{Aeq,15\text{minute}}$ Project Specific Noise Levels (PSNL) based on the nominated background noise levels. The EPA considers this approach consistent with the NSW Industrial Noise Policy 2000 (INP).

Acceptability of the PSNL for evening and night periods

The EPA consider the PSNL to be generally acceptable, however note that the proponent has used quarterly background noise monitoring data obtained over the period December 2010 to September 2012 at locations S1, S2 and S3, which includes noise emissions from the subject site. The proponent has processed this data to determine the lowest 10th percentile values, which it then considers representative of background noise levels at these locations in the absence of Springvale operations. The use of the lowest 10th percentile value is acceptable provided that data shows Springvale ceased operations (and hence its noise emissions did not contribute significantly to the overall RBL) for 10% or more of the monitoring period. The EPA considers that such further information on the operating periods for Springvale Coal Mine is required before it can support this approach.

The proponent has predicted noise levels from the project will exceed the PSNL, however has not considered the acceptability of the impacts in accordance with Chapters 8 and 9 of the INP. In the *Bulga Milbrodale Progress Association Inc v Minister for Planning and Infrastructure and Warkworth Mining Limited* [2013] NSWLEC 48, one of the issues which lead to the appeal being upheld was that impacts above the PSNL were predicted, but that in giving approval to the project the DPI did not consider the acceptability of the impacts in accordance with Chapters 8 and 9 of the INP.

Recommendations

1. The assessment predicts exceedances of the PSNL that must be addressed by the proponent in accordance with Chapters 8 and 9 of the INP. EPA will then be in a position to recommend noise limits for all residences predicted to receive noise levels up to and including the PSNL. For any other receivers predicted to receive noise levels above the PSNL, DPI is best positioned to weigh the social and economic benefits of the proposal against potential adverse noise impacts and to determine if a higher noise limit is justified. If a higher noise limit is accepted by DPI following this assessment and consent is granted EPA will include these limits in a licence, if one is required.
2. The proponent should provide robust quantitative information on the operating and non-operating periods for Springvale Coal Mine during December 2010 to September 2012 to support its claim that the lowest 10th percentile of all the ABLs measured at locations S1, S2 and S3 over that period is representative of the actual RBLs in the absence of any noise from Springvale operations.
3. The proponent needs to provide in Tables 45 and 46 the predicted noise levels for inversion scenarios.

Surface Water:

The EPA notes in Section 9.5.3.1 of the EIS that the proponent has identified surface water management as a moderate risk and that upgrades are required as part of the proposed project. The proponent goes on to state (Section 9.5.3.6) that a range of mitigation measures have been identified to improve the quality of surface water leaving the site and that these measures will be implemented following approval of the project.

The EPA agrees with the proponent that the historical add-hoc development of the site has not been conducive to best practice surface water management and that while the proponent has been making a number of improvements under Pollution Reduction Programs (PRP) attached to Environment Protection Licence 3607, further upgrades are still required. Some of the mitigation measures proposed by the proponent are currently captured as PRPs under Licence 3607 and these PRPs will need to be 'rolled over' to any new licence granted to the Western Coal Services Project. These PRPs are:

U1 Sediment dam storage capacities

- U1.1 The licensee must undertake works at the Centennial Coal Services site to ensure that the Main Sediment Dam, the Stockpile Sediment Dam and the Washery Sediment Dam have the capacity to store a 95th percentile (56mm) 5 day rainfall event.*

These works must be completed by 9 May 2014.

Note: The EPA will place a note under condition L2.4 stating that the water quality limits for licence discharge point 6 (LDP6) will not apply during a 95th percentile (56mm) 5 day rainfall event once the licensee has stated that all site sediment control dams have attained the appropriate storage specifications.

U3 Assessment of potential impacts of pollutants at LDP6

- U3.1 At Point 6 (LDP6) the licensee must monitor (by sampling and obtaining results by laboratory analysis) the concentration of each pollutant specified in Column 1 in the table below. The licensee must use the sampling method, units of measure and sample at the frequency as specified in the columns opposite each pollutant. The licensee shall continue to monitor for these pollutants at the upstream and downstream locations within Wangcol Creek as previously nominated.

Following the collection of additional monitoring results up until 31 December 2013, the licensee must undertake an assessment of the pollutants detected in water discharged from the site via LDP6 in accordance with ANZECC water quality guidelines and provide this assessment to the Bathurst Regional Office of the EPA by 28 February 2014.

Pollutant	Units of measure	Frequency	Sampling method
Conductivity	microsiemens per centimetre	monthly during discharge	Grab sample
Iron (dissolved)	milligrams per litre	monthly during discharge	Grab sample
Manganese (dissolved)	milligrams per litre	monthly during discharge	Grab sample
Nickel (dissolved)	milligrams per litre	monthly during discharge	Grab sample
Nickel (total)	milligrams per litre	monthly during discharge	Grab sample
Zinc (dissolved)	milligrams per litre	monthly during discharge	Grab sample
Zinc (total)	milligrams per litre	monthly during discharge	Grab sample
Total hardness	milligrams per litre	monthly during discharge	Grab sample

Note: It is the EPA's intention to place water quality limits for these pollutants on all discharges via LDP6 based on the results of this assessment.

The EPA generally supports the components of the proponent's Statements of Commitments for surface water management, as detailed in Part 5 of Table 67 of the EIS, with the exception of the commitment to "Within 3 months of consent apply to relocate the current LDP006 to the spillway of Cooks Dam and replace the existing LDP006 with a license monitoring point". The EPA is not prepared to turn the existing surface water discharge point 'LDP6' in to a monitoring point until there is a complete separation of clean and dirty water at the premises and until the EPA is satisfied that the water quality leaving the site through LDP6 represents the quality of water entering the site and not influenced by the Western Coal Services operations or former mining operations at the premises. Table 67 of the EIS indicates that the timetable to implement this is 5 years which appears to the EPA to be an excessive timeframe.

The EPA is also aware that surface groundwater seepages are leaving the Western Coal Services site along the Castlereagh Highway frontage, opposite the DML Dam. This matter was brought to the EPA's attention in May 2013 who in turn advised Springvale Coal. This water is characterised by low pH, high electrical conductivity and leaves behind an aluminium rich precipitate. These seepages are currently being investigated by Springvale Coal and this investigation program and any subsequent remedial actions will need to be incorporated in to a PRP on the Western Coal Services licence when separated from Springvale Coal's Licence 3607.

Macquarie RegionCnr Browning St & Panorama Ave Bathurst NSW 2795
(PO Box 143 Bathurst NSW 2795)**T** 02 6331 2044**F** 02 6331 5528www.forestrycorporation.com.au

15/10/2013

Ref No.: F2010/01269

NSW Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

Dear Colin

Please find below Forestry Corporation of NSW response to the Western Coal Services Project Environmental Impact Statement:

Western Coal Services should recognise the tenure of the land as State Forest managed by Forestry Corporation of NSW.

Should the proposal require modification of surface infrastructure please note that the mining company must enter into a compensation agreement with FCNSW to compensate for:

- Disruptions to forestry activities
- Use of forestry roads
- Loss of revenue from the removal of timber or other forest values

If you require further clarification, please contact Dan Kirby on (02) 6331 2044.

Regards

**DAN KIRBY**
STEWARDSHIP AND FIRE MANAGER
NORTHERN SOFTWOODS

JKH:AM
Environment & Development Dept.



3 October 2013

Mr Colin Phillips
Mining & Industry Projects
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Sir,

(SSD-5579) CENTENNIAL WESTERN COAL SERVICES PROJECT – LITHGOW COUNCIL SUBMISSION

Thank you for your referral of the abovementioned project, which was received on 21 August 2013.

Council thanks you for the opportunity to provide comment on the abovementioned project, and acknowledges that the project will provide a number of benefits and in particular will significantly reduce traffic movements in the locality.

Lithgow City Council Land Ownership

The development proposes to construct a haul road through property owned by Lithgow City Council known as Lot 42 DP751636. This development is not to impact on Council's approval for a new waste facility and is to minimise any potential impacts on future traffic movements in conjunction with that development. It is considered that the proposal to utilise Council land is acceptable subject to continued consultation and negotiation with Council throughout the processes until construction of the haul road is finalised. Naturally the proposed construction on and use of Council land will require some commercial consideration between the parties which may be able to be accommodated as part of a Voluntary Planning Agreement (VPA).

Noise

It is considered in the noise assessment that the Mt Piper Haul Road will not be used in prevailing noise enhancing weather conditions. However, it is not indicated how this will be managed, where the data will be collected i.e. weather station, real time monitoring or reliance on other sources.

In Table 17 (EIS p102) 11 out of the 16 receptors for Scenario 2 at Blackmans Flat will not meet the noise criteria for the project during evening and night periods. Only one negotiated agreement will be arranged for the worst case receptor B17, with no other negotiations stated. It is noted that out of these 11 receptors the following averages are evident from modeling:

- on a calm evening the average noise level is 2.4dBA above the project specific criteria

☎ (02) 6354 9999
📠 (02) 6351 4259

🌐 www.lithgow.nsw.gov.au
📧 council@lithgow.nsw.gov.au

✉ ADDRESS CORRESPONDENCE
TO GENERAL MANAGER
PO BOX 19, LITHGOW NSW 2790

- on a windy evening the average noise level is 4dBA above the project specific criteria
- on a calm night the average noise level is 2.4dBA above the project specific criteria
- on a windy night the average noise level is 1.2dBA above the project specific criteria
- on a night with inversion the average noise level is 4.2dBA above the project specific criteria

Further in Table 29 (EIS p.108) that the predicted maximum (worst case scenario) noise levels (L_{Amax} dBA) will not meet the 'Sleep Disturbance Noise Goal' at 13 of the receptors in Blackmans Flat. These levels are on average 12.7dBA above the criteria set, even if the applied 10dBA is taken into consideration (for difference of outdoor noise level to indoor noise level with all openings closed), the average is still 2.7dBA above the criteria. Table 32 (EIS p.109) also states exceedences for sleep disturbance criteria at Wolgan Road receptors on an average of 7dBA.

Council considers that these noise levels, although worst case scenario, do not meet the set criteria for the project and require mitigation. Additional noise mitigation measures such as limiting movements during evening and night could be implemented to reduce issues of noise, especially on Blackmans Flat. Additionally, the use of acquisition agreements could be implemented for additional receptors to give residents an option, if ongoing issue of noise at Blackmans Flat becomes evident once the development is operational.

Visibility

There will be some visual impacts on the nearby area, however is not significant. Council would request that the construction earthworks/mounds for the bridge over the Castlereagh Highway to be re-vegetated as soon as practical. This will potentially minimise visual impacts and mitigate against erosion and sedimentation issues.

Construction

The construction of all new buildings and infrastructure will require Construction Certificates. These applications will require all appropriate structural details and plans to be submitted along with the associated Council fees, should Council be chosen to be the certifier.

Onsite Waste Management

The increased use of the existing onsite sewerage management system from 15 employees to 18 employees needs to be justified with details of the existing system provided. This will require an assessment by a qualified person to advise Council that the existing system can handle the proposed loadings adequately and that the system is fully functional. If any upgrades are required, these will have to be undertaken in conjunction with the project. If the existing system requires full replacement then a Section 68 Application under the *Local Government Act* will be required.

Community Contribution

Council is interested in a community contribution by way of a VPA. This may also be a way of covering the construction on and use of Council land.

Please do not hesitate to contact Jessica Heath during business hours, between Monday and Friday on (02) 6354 9989 in Council's Environment and Development Department should you have any queries in relation to this matter.

Yours faithfully

A handwritten signature in black ink, appearing to read 'A Muir', followed by a long, horizontal, slightly wavy line that extends to the right.

Mr Andrew Muir

GROUP MANAGER ENVIRONMENT & DEVELOPMENT

27 August 2013

Mr Rod Dwyer
Principal Planner/General Manager
RPS Australia
PO Box 428
HAMILTON NSW 2303

Dear Mr Dwyer,

**Re: Western Coal Services Project (Project Application no: SSD-5579)
Environmental Impact Statement**

I am writing in regards to the request for review of the Environmental Impact Statement (EIS) provided for the Western Coal Services Project. A review was previously conducted by Nepean Blue Mountains Local Health District and a letter with comments was sent to the NSW Department of Planning and Infrastructure, dated 31 May 2013. The comments focused on the Air Quality and Noise requirements as these are the impacts of most concern with the project proposal in relation to long term health effects on the community.

A second version of the EIS has been received, and we have received an email from Lyndon Bryant from Centennial Coal, dated 27 August 2013, which attempts to address some of the issues raised in the initial review. Whilst a number of our concerns have been addressed adequately, the following issues in relation to Air Quality and Noise remain:

Air Quality DRGs

- It is noted that the comment on how existing PM_{2.5} levels were estimated has been addressed. However it is unclear why Bathurst data was used for estimating background levels of PM_{2.5} and PM₁₀.

Noise DRGs

- The assessment proposes individual agreements with residents at Blackmans Flat; however, more detail should be provided about whether building treatment or acquisition is being considered as an option. We understand that individual agreements are confidential, but it would be useful to know what options residents are being offered as these will have long-term impacts on their health.
- The EIS outlines the approach to assessing potential sleep disturbance according to the NSW EPA Industrial Noise Policy, however the report then refers to use of alternative sleep disturbance criteria such as the NSW Road

Nepean Blue Mountains Local Health District
ABN 31 910 677 424

Nepean Hospital
Derby Street, Penrith NSW 2750
PO Box 63, Penrith NSW 2751
Tel (02) 4734 2000

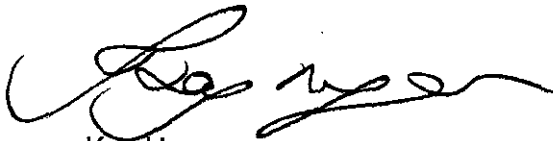
Website www.nbmlhd.health.nsw.gov.au

Noise Policy (RNP), which are not as stringent. The use of alternative sleep disturbance criteria to develop alternative project specific noise goals is not supported.

The EIS noted in the overview of key findings (Appendix 7 Social Impact Assessment) that conventional measures to reduce the impacts (noise, visual and dust) will not address the cumulative impacts that have occurred over many years, and future zoning of Blackmans Flat will need to recognise dominant land use.

If you like to discuss any of the above comments further please contact Nicola Scott, Public Health Officer on (02) 4734 2022.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kay Hyman', with a long horizontal flourish extending to the right.

Kay Hyman
Chief Executive



Office of Environment & Heritage

Date: 27th September 2013
Your reference: SSD 5579
Our reference: DOC13/66863
Contact: Liz Mazzer
68835325

Colin Phillips
Infrastructure Projects
NSW Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

Dear Mr Phillips

RE: Centennial Western Coal Services Project (SSD 5579)

I refer to a letter sent on 20th August 2013 by RPS on behalf of Springvale Coal seeking comment from the Office of Environment and Heritage (OEH) on the Environmental Assessment (EA) for the Western Coal Services Project.

OEH has reviewed the documentation and, in summary, considers that the following is required:

- A clear commitment to offset impacts on native vegetation,
- A more detailed assessment of the values of planted / rehabilitated vegetation, and
- Inclusion of the proposed water management for the Western Coal Services Project in the Regional Water Strategy.

Further detail is provided in Attachment A.

If you have any questions regarding this matter further please contact Liz Mazzer on 02 6883 5325 or email liz.mazzer@environment.nsw.gov.au

Yours sincerely

SONYA ARDILL
Senior Team Leader Planning
North West Operations

ATTACHMENT A

Biodiversity and Water Management

ISSUE 1

Interaction with previous consents and commitment to offset impacts on biodiversity.

Background

OEH understands that the impact of the proposed project (where Haul Road 2 is the preferred option) includes removal of up to:

- 0.05ha of Tableland Gully Snow Gum – Ribbon Gum Montane Grassy Forest (MU 11),
- 10.62ha of Cox's Permian Red Stringybark – Brittle Gum Woodland (MU 37), and
- 30.67ha of planted / regenerating vegetation.

OEH is aware that previous consents, including part of the Mt Piper Ash Placement consent (application 09_0186) held by Delta Electricity, apply to parts of the proposed impact area. This includes areas of planted / regenerating vegetation and 10.35ha of MU 37, which is located in Lamberts South within the proposed Reject Emplacement Area (REA) footprint.

In the Conditions of Consent for the Mt Piper Ash Placement (09_0186), Delta Electricity is required to develop a Biodiversity Offset Management Plan which includes an offset for direct and indirect impacts of the proposal to maintain or improve biodiversity values. Consistent with Condition B6 of the consent for application 09_0186, Delta Electricity has produced a Biodiversity Offset Management Plan for Lamberts North and a Biodiversity Offset Strategy Outline for Lamberts South.

The Western Coal Services Project proposal, if approved, will result in the remnants of MU37 in Lamberts South being cleared and rehabilitated over a 25 year period. During this time, this area will not be available for use for the Mt Piper Ash Placement project, and there is uncertainty as to whether it will be used for this purpose after 25 years. The Western Coal Services Project will therefore have the more immediate impact on remnant native vegetation in the area. It is unclear as to whether the requirement for providing a biodiversity offset for the remnant native vegetation to be cleared in Lamberts South will be the responsibility of Delta Electricity or Centennial Coal.

Section 9.5.6.7 of the EA states that,

Centennial is developing a regional biodiversity offset strategy in close consultation with OEH which will cover a number of projects in the Western Coalfield including the Western Coal Services Project. OEH has indicated that it has a preference for a regional approach rather than individual strategies for each project as a regional package would yield greater environmental benefits. Consultation on the regional strategy is ongoing.

While this statement demonstrates that Centennial is developing a regional biodiversity offset strategy, there is no clear commitment within the Western Coal Services Project EA to indicate that the clearing of native vegetation associated with this project will be included in the overall offset calculations for the regional offset package.

Recommendations

- That the EA include a clear commitment (ie in the Statement of Commitments) to offset the impacts of this proposal on native vegetation as part of a regional offset package for Centennial's operations.
- That impacts on native vegetation be clearly quantified in such a way that they can be included as part of the overall offset calculations for such a regional offset package.

ISSUE 2

The biodiversity values of planted / regenerating vegetation have not been assessed.

Background

The proposal would result in the clearing of approximately 30.67 ha of Planted Regenerating Vegetation. Section 4.3 of the Ecological Assessment (Appendix 8) describes this as,

These areas of the site are mostly comprised of young Eucalyptus and Acacia species, planted as part of rehabilitation efforts over the site.

There is no detail provided regarding species, age or potential habitat values of this vegetation.

Recommendation

That the age and species comprising Planted Regenerating Vegetation be identified, and this community's habitat values be considered as part of the biodiversity assessment for the project.

ISSUE 3

Relationship with the proposed Regional Water Strategy.

Background

The EA states that the existing coal processing operation uses 0.885 MI per day which will increase to a total of 2.725 MI per day with the increase coal processing and dust controls. The project has incorporated increased water recycling capability to remove and recover water from the tailings. This will result in approximately 1.5 MI per day of water recovery and recycling and only 0.34 MI per day of make-up water required.

The water balance modelling presented in the EA indicates that the Western Coal Services Project will be a net producer of water during average rain years but there will be a water deficit for 20 to 30% of days in future. During low rainfall periods and drought conditions, water makeup will be provided from the Springvale Mine via a water supply pipeline along the overland conveyor (Table i).

The Statement of Commitments includes the development of a single Water Management Plan to be prepared for the entire project application area.

OEHL understands that a Regional Water Strategy is in development which should include water usage and disposal by the Western Coal Services Project. No information regarding the Regional Water Strategy has been included in the EA.

Recommendation

That a commitment be made to include the water management associated with the Western Coal Services Project as part of the Regional Water Strategy.



Transport
Roads & Maritime
Services

WST12/00027

Manager
Mining Projects
Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001



Dear Sir

Western Coal Services Project (SSD-5579); Exhibition of Environmental Impact Statement

Thank you for your email received 20 August 2013 referring the Environmental Impact Statement for the Western Coal Services Project to Roads and Maritime Services for submissions.

Roads and Maritime will not object to the proposed development and provides the following requirements:

The design and construction of the overpass of the Castlereagh Highway will be administered through a Works Authorisation Deed entered by the proponent with Roads and Maritime. The Deed will provide for the specifications to be met in the design and construction of an overpass following consultation with the Roads and Maritime Project Services Manager.

Castlereagh Highway Overpass

The bridge structure over the Castlereagh Highway is to be designed and constructed to Roads and Maritime requirements, including (but not limited to):

- Compliance with *AS 5100 Bridge Design*.
- Minimum vertical clearance of 6.5 metres from the highway centreline to the underside of the bridge.
- The typical cross section width of the Castlereagh Highway at the overpass is to cater for a horizontal clearance of 14 metres for a two lane highway. The 14 metre horizontal clearance must be increased by the width of any additional lanes and medians.
- Wire rope safety barrier is to be used between the highway carriageway and the bridge structure, requiring 1.5 metres clearance from the barrier to the bridge structure.
- The applicant will be responsible for maintenance and subsequent removal of the proposed overpass structure at the completion of the mine operation and will be required to lodge a security deposit/bond adjusted annually for Building Price Index increase as part of the Deed to ensure this.
- The bridge structure and approaches are to be designed to minimise impacts on maintenance activities required within the road reserve. Maintenance activities required for the bridge structures are to be carried out from within or on the bridge structure.

Roads and Maritime Services

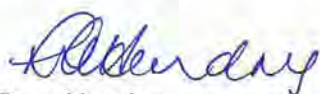
- The Roads and Maritime concurrence role as provided for by the Section 138 of the *Roads Act 1993* and consent role as provided for by the Works Authorisation Deed includes all works affecting the Castlereagh Highway (HW18).
- Traffic management during construction has not been addressed in the Environmental Impact Statement. If a sidetrack of the Castlereagh Highway is required, this will need to cater for two-way traffic during construction of the proposed overpass. Sidetrack requirements are to be designed to 90km/h standard with an 80km/h speed zone throughout. The sidetrack is to be a minimum 9m width seal and verge with edge line marking. The pavement is to be minimum 400mm pavement thickness; the pavement design is to be approved by Roads and Maritime. The sidetrack is also to be designed to cater for oversized loads up to 8m wide that travel the highway.

General

- Sight distance along the highway is to be maintained at the existing level, this is to be addressed as part of the design of the haul road overpass.
- Any proposed road facilities and intersection treatments are to be in accordance with the *Austroads Guide to Road Design* and Roads and Maritime supplements, including the provision of safe intersection sight distance. The Roads and Maritime supplements to the *Austroads Guide to Road Design* are available online at www.rms.nsw.gov.au/doingbusinesswithus/ausroadsguides/road_design.html
- All non general-access vehicles will need to be approved by Roads and Maritime and the appropriate gazettal obtained for use of the road network, including local roads.
- Road Safety Audits are to be conducted at the design and pre-opening stages in accordance with *Austroads Guide to Road Safety Part 6: Road Safety Audit (2009)*. The developer is responsible for mitigating deficiencies noted within the audit report. This is relevant for works impacting on the Castlereagh Highway
- The applicant is required to obtain permits for any oversized and over-mass loads from the Roads and Maritime Special Permits Unit in Glen Innes, Ph 1300 656 371.
- All works associated with the project including consultation and planning will be at no cost to Roads and Maritime.

Please keep Roads and Maritime informed of the progress of the Project Application. If you require any further information please contact Fiona Francis on (02) 6861 1688.

Yours faithfully

 25 SEP 2013

Tony Hendry
Road Safety and Traffic Manager
Western

Roads and Maritime WAD Advices

Advice to the Developer for inclusion in Notice of Determination under 'Advices'

- Conditions of development consent do not guarantee Roads and Maritime consent to the specific road works, traffic control signals and /or other structures or works for which it is responsible. The Developer must obtain Roads and Maritime authorisation in writing prior to the commencement of any road works on the Castlereagh Highway, including traffic management, temporary or permanent road works associated with the proposed development.
- Following development consent, early discussion with the Roads and Maritime Project Manager is recommended. Roads and Maritime will initiate the WAD process by sending out a letter and information pack on receipt of the Project Approval, including the name and contact details of the Roads and Maritime Project Manager.
- As the WAD process, including acceptance of design documentation and construction can take considerable time, you should allow sufficient lead time within the project development program to ensure that all documentation and works are completed in advance of operation. Roads and Maritime will not consider granting concurrence to occupation until it is satisfied all documentation and works under the WAD have been completed.
- Authorisation to commence construction will only be granted when Roads and Maritime is satisfied that all requirements under the WAD have been met by the Developer, including Roads and Maritime fees and charges, an unconditional bank guarantee for the full value of the works, detailed design documentation, environmental assessment, road occupancy licence, among other matters. Roads and Maritime will issue a letter to the Developer advising of this authorisation.
- Any property acquisition /dedication required to accommodate the State road works associated with the proposed development shall be at full cost to the developer, including all legal and survey costs. This land shall be dedicated by the Developer as public road reserve in favour of the Council, as the owner.
- Part of the Developers timeline should make provision for Roads and Maritime to satisfy its obligations under the *Environmental Planning and Assessment Act 1979* (EP&A Act) to assess the environmental impacts of the works within the road reserve. Further investigation and assessment to that undertaken for the development consent may be required to the satisfaction of Roads and Maritime, under Part 5 of the EP&A Act.
- It is recommended that the developer use design consultants with the experience and knowledge of the Roads and Maritime design requirements, in particular the Austroads Guide to Road Design (with Roads and Maritime supplements) and relevant Australian Standards.
- Construction on a State road requires the engagement of a Roads and Maritime pre-qualified contractor. A list of pre-qualified contractors can be found on the Roads and Maritime website below.

<http://www.rms.nsw.gov.au/doingbusinesswithus/tenderscontracts/prequalifiedcontractors.html>

Advice to the Consent Authority

- On the Minister's determination a copy of the Project Approval should be forwarded to Roads and Maritime within the appellant period for advice, consideration and/or action where required.



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Penrith NSW 2750
Tel 1300 722 468 Fax 02 4725 2599
Email info@sca.nsw.gov.au
Website www.sca.nsw.gov.au

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

Yours sincerely



for

MALCOLM HUGHES

A/Senior Manager, Sustainability

4/10/2023

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



EnergyAustralia

26 September 2013

NSW Department of Planning and Infrastructure
GPO Box 39
Sydney NSW 2001

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ABN 99 086 014 968

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Dear Sir/Madam

RE: Western Coal Services Project - EIS Submission

EnergyAustralia welcomes the opportunity to provide a submission on the Centennial Western Coal Services Project EIS, which has been on public exhibition from 26 August to 26 September 2013.

EnergyAustralia is a key stakeholder in the Lithgow region and with the local community. We own and operate the Mt Piper and Wallerawang power stations, as well as associated water infrastructure and the Pine Dale mine. The efficient operation of this portfolio of assets provides significant economic benefit to the local region, as well as to the broader state economy through the power stations' contribution to the NSW wholesale electricity market.

EnergyAustralia supports continued economic development in the region and considers that projects such as the Western Coal Services Project can contribute to this. However, we note that the Centennial application proposes a number of new and expanded project infrastructure elements which have the potential to adversely impact ongoing operations at the Mt Piper and Wallerawang power stations as well as impacting lands which EnergyAustralia hold existing interests in.

To ensure that new developments such as the Western Coal Services Project contribute to the region's economic development without subtracting from existing coal and power generation activities or the efficient functioning of the overall region, we request a consultative approach to provide opportunity for EnergyAustralia's input prior to the final design and the commencement of construction.

Specifically, the proposed washery expansion, additional conveyor and transfer stations, and rejects emplacement areas all encroach upon EnergyAustralia owned land. As such, it is requested that prior to the finalisation of the detailed design and operational plans thereof, Centennial consults with EnergyAustralia for approval, so as to ensure that the management of these lands are not adversely impacted.

It is noted that the proposed rejects emplacement area presents an overlapping consent area to the approved Mt Piper Ash Placement Project, presenting additional ash storage challenges to ongoing power station operations. Furthermore, the proposed Project Application Area overlaps lands of the Pine Dale mine and the Pine Dale Stage 2 development, presenting a conflict. The proposed Link Haul Road alignment also traverses Pine Dale mine lands, as well as lands for which EnergyAustralia holds ash storage interests.

As such, it is requested that prior to the finalisation of detailed design of the Link Haul Road, Centennial consults with EnergyAustralia for approval, to ensure our operational interests are not adversely impacted.

Given the level of impacts upon EnergyAustralia land and operational interests, a consultative approach in the implementation of the proposed coal services infrastructure is considered imperative to minimizing risks to ongoing reliable electricity generation.

As a key stakeholder to the region, EnergyAustralia is keen to pursue a planning outcome which supports the operational continuity of our assets and the ongoing contribution of the industry to the community.

I would welcome the opportunity to meet with you to discuss the proposed project and how workable arrangements could be put in place and will contact your offices in due course. In the meantime please feel free to contact Mark Frewin on 03 8628 1130 or mark.frewin@energyaustralia.com.au if you require more information.

Sincerely

A handwritten signature in dark ink, appearing to read 'R Edwards', with a stylized flourish at the end.

Ross Edwards

Executive Manager Corporate Strategy & Development

The Director
Policy Systems and Procedures, Development Assessment Systems and Approvals
NSW Department of Planning and Infrastructure
By email: plan_comment@planning.nsw.gov.au

30 September 2013

Dear Director,

Submission of Objection – Western Coal Services Project

The Nature Conservation Council of NSW (NCC) welcomes the opportunity to comment on Centennial Coal's Western Coal Services Project.

NCC is the peak environment body for New South Wales, representing more than 100 organisations. We have long-standing experience in state environmental assessment and planning and are extremely concerned with the proposed upgrade of existing handling and processing infrastructure at the Angus Place and Springvale coal mines.

This project put forward by Centennial Coal poses health and environmental risks to the local communities of Lithgow and its surrounding towns. Not only will there be higher levels of coal dust produced due to the increased movement of coal from the mines, there will be negative water quality and noise impacts.

NCC objects to the Western Coal Services Project on the following grounds:

Coal dust impacts

Coal dust in the form of particulate matter (PM₁₀ and PM_{2.5}) poses a significant health risk to the people living in proximity to the mines and coal transport routes. The health risks related to particulate matter include respiratory problems, cardiovascular issues, increase in the incidences of asthma and premature death. People who are at most risk from particulate matter exposure are children, teens and those over the age of 65¹.

The proposed increased output of the Springvale mine and the approved Angus Place Modification 1 Project will result in an increase in the coal dust along the Wallerawang and Mt Piper haul roads. As shown in Table 40, the comparison of scenarios 1a and 1b to scenario 2a and 2b shows a considerable increase in PM₁₀ levels².

¹ American Lung Association, 2013, *State of the Air 2013*, <http://www.stateoftheair.org/2013/assets/ala-sota-2013.pdf>, pp.33-34.

² NSW Dept of Planning and Infrastructure, 2012, *Springvale Mine Extension Project*, http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5594

The National standards for particulate matter levels, PM₁₀ and PM_{2.5} are 50 µg/m³ over a 24-hour period and 25 µg/m³ over a 24-hour period³. According to the Western Coal Services Project EIS, there could be gross exceedances of the National standards for PM₁₀ and PM_{2.5} at sites such as WR1 and WR2.

Impact on water quality

Based on the most recent Sydney Catchment Audit 2010, water quality in the Nuebeck's Creek sub-catchment of the upper Coxs River is considered the worst in the entire Sydney Catchment.

The water quality problems stem from the open-cut mining at the old Eastern & Western Main Collieries (the Proposed Area), and the adjacent old Wallerawang Colliery (now Pine Dale Mine). Bad extraction practices of poor-quality shale and claystone coal seams, which are high in sulphur and pyrites, led to the creation of a legacy of acid mine drainage, salinity and heavy metal problems.

The Western Coal Services Project EIS has identified concerns about contaminants from the processing centre, including iron, manganese, nickel, and zinc, entering the local watercourses. It also highlighted that there would be increased salinity levels and sediment deposits in the creeks and rivers that flow past the washery site.

The concerns raised in the EIS are similar to those of the Lithgow community, members of which have conducted their own monitoring and water quality checks in the waterways. They have found pH, salinity, and phosphate levels and water temperatures are much higher than background levels, and that dissolved oxygen levels have decreased over the same period⁴. The increased output from the washery at the Springvale Coal Service site could exacerbate these water quality issues putting further strain on the local water supply and the flora and fauna that rely on these waterways for their survival.

Impacts on the community

The village of Blackmans Flat is already affected by two open-cut mines, the 1500 MW Mt Piper Power Station and Centennial's coal washery and coal handling operations. Additional 24-hour-a-day, seven-day-a-week coal-handling operations within metres of the residents of Blackmans Flat is unacceptable.

This project could result in the quadrupling of heavy coal truck movements along the Coal Link Angus Place to Mt Piper Haul Road that would create noise and lighting issues for local residents. Blackmans Flat is in a valley, and the noise generated by mining and power generation operations bounces off surrounding hills and is projected south down the valley. Noise from bulldozer trucks working on the Mt Piper Coal Stockpile have resulted in complaints from residents 4km away. This noise is amplified by the localised phenomenon of temperature inversions, which are common during winter, late at night, and early mornings when sleep disruption is likely to occur.

³ Australian Government; Department of Sustainability, Environment, Water, Population and Communities, 2013, *National standards for criteria air pollutants in Australia*, <http://www.environment.gov.au/atmosphere/airquality/publications/standards.html>

⁴ Lithgow Environment Group, 2010, Stream Watch, <http://www.lithgowenvironment.org/stream-watch.html>.

Over the past 12 months the demand for electricity in NSW has decreased, and this led to two Wallerawang generators being shut down during January⁵. However, according to proposed changes, it is projected that out of the 7 Mtpa processed at the Springvale Coal Service site, 6 Mtpa will be exported. The threat posed by this project to the local communities far outweighs the benefits it brings to the local economic and employment sector.

Conclusion

Given the impacts on the air, water and the community, it is irresponsible to develop the Western Coal Services Project and we urge the NSW government to reject the proposal.

Yours sincerely,

Katherine Smolski
Campaigns Director

⁵ Pitt & Sherry. 2013. Carbon Emissions Index – Electricity Emissions Update – 30th April 2013, <http://www.pittsh.com.au/assets/files/Cedex/CEDEX%20Electricity%20Update%20May%202013.pdf>.

18TH September 2013

Attention Mr Colin Phillips

NSW Planning & Infrastructure

Major Project Assessments

Mining & Industry Projects.

Dear Sir

Re: Submission for Western Coal Services – SSD12-5579

I object and oppose this project as with every other project that has been passed by the State Government or Lithgow City Council in the Blackmans Flat area. Would you or could you honestly say that you would live here? And yet you expect people to accept this as quality long term planning and a current and future quality of life.

This area as you should by now know is a rural setting bordering on the Ben Bullen State Forest which has been acknowledge by the Premiers department to be listed for reservation. Equally documented is the acknowledgement of preserving sensitive lands and waterways by Lithgow City Council in their current draft LEP. At the same time Lithgow City Council have determined that given the state significant and local approvals, this rural setting which is currently zoned Rural 1A is now proposed to be zoned as Employment Lands -Heavy Industry. Whilst no one denies the need for financial economic viability, Blackmans Flat residents have paid the price time and time again for this State for many years through no choice by the loss of their quality of lifestyle, their health, their environment, their property values, and the deterioration of their homes due to blasting which has never been acknowledged by any of these companies in their so-called 'rigorous independent assessment processes'. A Departmental review is long overdue and needs to be determined by the Department and not by the contracted consultants by those companies.

Again I ask that the NSW government ensure that these companies as well as Lithgow City Council, who were well aware of residents living in the area when they determined past developments to have an inclusive approach not only for industry but for all of the local constituents.

Lithgow City Council have completed their draft Local Environment Plan which if the department took the time to read will show that there is no outcome or solution for the people who live in the immediate area of Blackmans Flat in fact they as well have given no out policy for those remaining residents. They have dictated that industry is important and people are not.

Whilst again I acknowledge the importance of industry there has been no inclusion for the people who live here. Those families were here before most of the proposals were approved or a very smaller scale and each and every company were consciously aware of those residents with no respect or care about the damage they imposed upon us. There is no balance here or inclusiveness and those companies have profited whilst each individual has lost the only real asset they have and worked all their life to attain – only to be given the death sentence by the Department and Council. If those companies did have any real respect for their community members they will do the most honourable and assist with relocating at no cost to the resident. I would see the only solution is for the government to step up and start proactive legislation that enforces any company who wishes to operate industry to be responsible for relocation at no cost to the resident.

I would like to thank the Department for strongly urging Centennial Pty Ltd to undertake genuine consultation, for requiring the Company to produce a Social Impact Statement, and for requiring them to address the current and future cumulative impacts on this community. The company now appears to be proceeding with relocating the **immediate residents** impacted upon by this individual Project, but I believe that **the Department must ensure that all of the Companies operating in this area are made equally responsible for contributing to the relocation of any affected resident within a 3 kilometre radius who wish to be relocated at no cost to them.**

However I recently visited Centennials community consultation day and met with their representatives and enquired why we have not received any further correspondence regarding relocation? I was advised they will not consider our relocation as we are not in the immediate area, but some 800 - 1000 metres from this particular site, approximately 600 - 800 metres from Pine Dale Site, approximately 1.2 kilometres from the existing eastern boundary for the ash repository and 1.4 kilometres from the proposed Nuebecks Creek Open Cut Mine. I am deeply disappointed and the fear of retribution rings loud-and-clear due to the fact that I have been outspoken in my objection to these projects trying to protect the other residents of Blackmans Flat and the only real asset I have – my home.

As the department is well aware, the current cumulative impacts and Centennials Social Impact consultant reports that exceedences will occur due to quadrupling the coal handling from 2 to up to 9 million tonnes per year including an unknown quantity on site of coal fines, 24 hours per day, 7 days per week, increased trucks movements along the Angus Place to Mt Piper private Haul Road, and an overpass over the highway linking the private haul road to the project area. Add the current application for Nuebecks Creek Open Cut Mine which undoubtedly will be approved, Pine Dale Stage 2 to demolish 200 hectares of the Ben Bullen State Forest with unknown coal stock piles with a exploration licence of another 300 hectares of open-cut , the approval of Mt Pipers Ash Repository closer to our home which is currently holding over 12-14 million tonnes of fly ash, unknown quality of coal stock pile on site we will certainly will have increased our loss of quality of life, our home and natural environment, increased health issues, loss of property value through no fault of our own due to these current and future proposal.

Attached is a snap shot of Blackmans Flat taken in 2006, unfortunately we do not have the opportunity to have access to the real time picture of impacts on the area but believe you would have that opportunity to view. As you can see given all of those industries and the position of our home and the dominating winds, the contours of the forest gives indication of huge concerns of air quality. I am beyond reading and believing data from any of those companies as questioned this current system given past historic evidence by volunteers that has been proven to show all the

documentation provided by a company given to the department failed on numerous occasions with breaches of both state and federal acts.

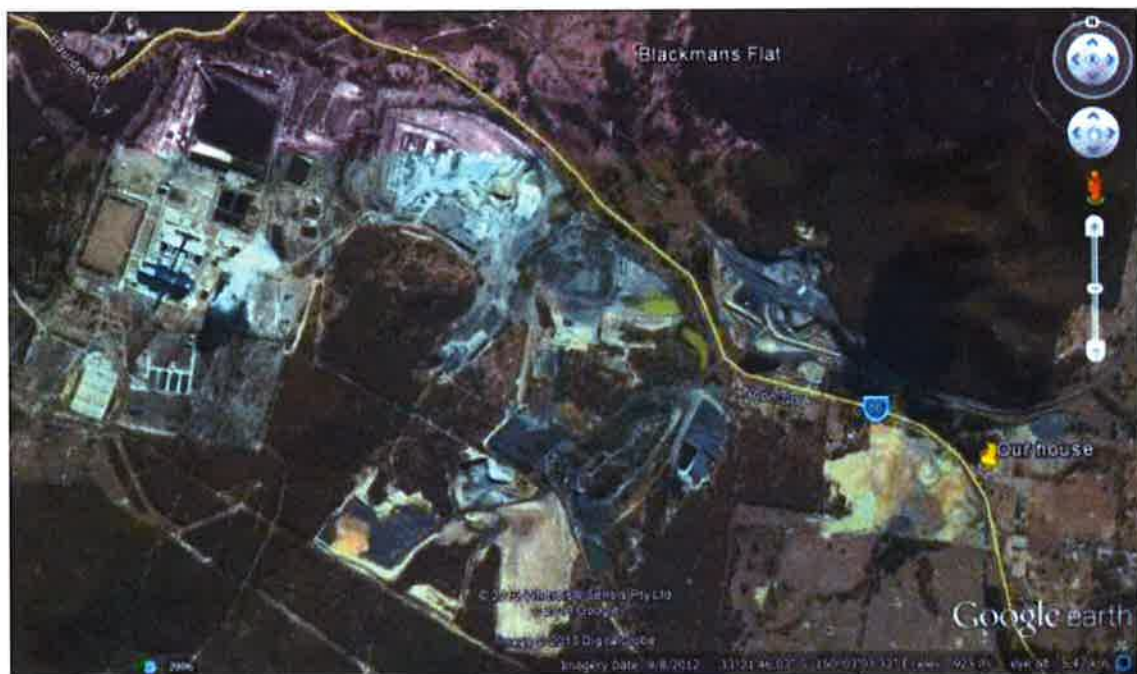
I recommend that the NSW Government proceed with legislating to protect not only industry but people with a 3 kilometre radius barrier for industry from any resident.

I recommend that the NSW Government proceed with legislating in the field government staff to review any industrial development application that is state significant to ensure that the application does reflect accuracy.

I recommend that the NSW Government proceed with legislating in the field government staff to commence an ongoing monitoring program for recording native vegetation.

I recommend that the NSW Government proceed with legislating that all industries will comply with having a neutral and beneficial result with zero discharge pollution policy for waterways, land and air.

Yours truly





Centennial Coal

Centennial Coal Company Limited

c/- Locked Bag 1002

Wallerawang NSW 2845

