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Ref: D2014/50780

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

Dear Mr. Reed

## **Angus Place Mine Extension Project (SSD-5602)**

The Sydney Catchment Authority (SCA) appreciates the opportunity to provide its comments on the Environmental Impact Statement for the Centennial Coal Company Pty Ltd (Centennial) Angus Place Mine extension project.

The SCA notes that the Angus Place Mine's existing ventilation shaft (APC-VS2) and pit top and associated water management structures and spoil management areas are located in the Upper Coxs River sub-catchment, which is part of the Sydney's drinking water catchment, whilst the proposed longwalls and new supporting facilities are located outside the catchment. Therefore, the focus of the SCA's assessment for the proposal is related to the project components located within the Sydney drinking water catchment.

The SCA is concerned about the increased mine water discharges and associated water quality impacts (salinity) to Kangaroo Creek and Coxs River. The SCA notes that there is currently a Pollution Reduction Program with respect to discharge at Angus Place requiring reduction in salinity levels.

The SCA is also concerned about the proposal to transfer mine water to the local power stations (Mt Piper and Wallerawang) which the SCA understands will have limited and reduced availability due to the recent decision to place the Wallerawang power station in care and maintenance. As a consequence, there may be additional discharges of mine water into receiving watercourses of approximately 30 ML/d from this project. These discharges would further impact the quality of receiving waters and the EIS has not addressed this issue. The SCA considers that the Proponent should either consider an alternative opportunity for mine water reuse or treatment of mine water to a higher level before discharge.

The SCA requests that the Department requires the Proponent to address the SCA's concerns and attached detailed comments. If you wish to discuss any matter in this letter, please do not hesitate to contact Dr Girja Sharma on 4724 2459 or girja.sharma@sca.nsw.gov.au

Yours sincerely

MALCOLM HUGHES

Senior Manager Planning & Environment

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## SYDNEY CATCHMENT AUTHORITY DETAILED COMMENTS

for

## ANGUS PLACE MINE EXTENSION PROJECT ENVIRONMENTAL IMPACT STATEMENT June 2014

Discrepancies and issues that need to be addressed are as follows:

- The EIS states that the baseflow to creeks within the Coxs River catchment is predicted not to be impacted due to the proposed extension at "Springvale" (pages 74 and 75 of Appendix E). Clarification is needed as to whether this prediction is related to Angus Place or Springvale Colliery extension and accordingly corrected.
- The baseflow reductions in Kangaroo Creek are inconsistently presented in the EIS (pages 74 and 75 of Appendix E). Figures 55 and 57 presenting baseflow predictions either do not show Kangaroo Creek or Kangaroo Creek has not been labelled clearly.
- Salinity predictions have been undertaken for the location below the confluence with the Coxs River, not where discharge occurs in Kangaroo Creek. No predictions are made on what would be an expected increase in salinity compared to the current conditions at the discharge point LDP001. The SCA notes that there is currently a Pollution Reduction Program (PRP) on EPL467 with respect to discharge at LDP001 which requires a reduction in salinity levels from 1,100 to 350µS/cm.
- Salinity predictions have not been undertaken for scenario (1) no upgrade of SDWTS and (2) no SWDTS availability and all mine discharges (28.6ML/day) being discharged to the Kangaroo Creek and Coxs River. This is a significant concern to the SCA.
- Salinity predictions have not been undertaken when excess inflows, more than the Wallerawang power station demand of 30 ML/d, is proposed to be discharged at LDP009, at a point immediately upstream of Lake Wallace.
- There is no assessment on whether elevated salt levels are likely in the Coxs River where it enters Lake Burragorang.
- The model predictions for the average Coxs River salinity should include an envelope around the average showing 10th and 90th percentiles.
- The EIS states that based on data available, the estimated error in predictions is approximately ±30%. It is not clear if the upper limits would still fall within an acceptable level of impact.