



Date: 15 December 2020
Our Ref: 20201215-SMPPS-DPIE

Mr Andrew Rode
Department of Planning, Industry and Environment
12 Darcy Street
Parramatta NSW 2124

Dear Mr Rode

**Submission in relation to State Significant Development Modification Applications
Angus Place Colliery – Modification 6 (Angus Place Coal Project (MP 06_0021))
Springvale WTF – Modification 6 (Springvale Water Treatment Project (SSD 7592))**

Veolia is the designer, builder and operator of the Springvale Water Treatment Facility (**Springvale WTF**), which receives mine water from Springvale Coal Mine and Angus Place Coal Mine and treats it for beneficial reuse in Mount Piper Power Station.

We are writing to advise that we object to the proposed Modification 6 applications in respect of Angus Place Colliery and the Springvale WTF referred to above. We have set out the key reasons below.

Whilst we understand that the application for Angus Place Colliery Modification 6 is being publicly exhibited and the Springvale WTF Modification 6 is not, these proposals are interlinked and form part of the same water treatment system for the coal mines and Mount Piper Power Station, and accordingly our position and comments apply to both applications.

Regrettably Veolia was not consulted on the proposed Modification 6 prior to it being lodged with the Department. However we note that following the publication of the "*Centennial and Energy Australia Angus Place Coal Project (MP 06_0021) and Springvale Water Treatment Project (SSD 7592) Modification 6 - Modification Report*" (**Modification 6 Report**), Veolia has commenced discussions with Energy Australia and Centennial, including in relation to the issues discussed below, and all parties are committed to reviewing the technical issues and to work collaboratively to develop alternative, low to no impact solutions.

Objection 1: The proposed modification is unnecessary as the existing Springvale WTF has the ability and capacity to treat Angus Place Mine Water

First, the existing Springvale WTF can treat the Angus Place Mine Water without any pre-treatment. The applicant's modification application attempts to address (in part) the total hardness of the mine water as providing justification for the modification. However, the Springvale WTF has already been proven to successfully treat mine water with elevated total hardness coming from Angus Place Mine (demonstrated, for example, during the period from 2 February 2020 to 18 March 2020 where the total hardness of the mine water was 36mg/L on average, with a maximum of 52mg/L CaCO₃ on the 9 February 2020).



Second, the Springvale WTF has the capacity to treat the mine water volumes. The reduced flow conditions referred to in the report were small reductions only and/or for a short period of time. Aggregated data indicates that during that year to date, there has only been an average of approximately 2.5% reduction in the mine water flows treated by the Springvale WTF.

The Springvale WTF is designed to accept 36ML per day of mine water during normal operations, and occasionally 42ML per day when required.

A reduction of 2.5% results in an average Springvale WTF availability of approximately 35ML per day, which is still higher than what appears to be the total extraction rates permitted under the relevant consents (MP 06_0021 and SSD 5594) of 32.4ML per day.

Accordingly, Modification 6 is not necessary to manage the flows or hardness levels of mine water from the Angus Place Coal Mine, nor would it be effective as a mitigant to the risk of mine flooding.

Objection 2: The proposed modification would result in detrimental environmental and social impacts

Pre-treating Angus Place mine water for hardness using the process suggested in the Modification 6 Report risks water contamination with polymers and the precipitation of barium sulphate, which would be highly damaging to the Springvale WTF. Such damage could lead to significant reduction in water treatment capacity, if not cause complete shutdown, and would accordingly jeopardise the environmental objectives and benefits of the Springvale Water Treatment Project.

In addition, we have concerns regarding the following environmental and social impacts of the proposed modification in the relevant areas:

1. The additional pipeline infrastructure proposed would expose the environment to increased potential for leaks.
2. The proposed pre-treatment facility is a large structure with additional risks of leakage of both mine waters and/or chemicals used in its treatment.
3. The proposal, which involves sending relatively dilute mine waters to Mount Piper Power Station's Brine Concentration facility will consume significantly more energy to evaporate water than using the existing (and more efficient) Springvale WTF.
4. The remote location of the proposed pre-treatment facility creates a high safety risk for the remote workers and technical monitoring of plant performance in such areas carries an increased risk of erroneous dosing and loss of containment.
5. In relation to sludge production at the pre-treatment facility, there is an additional risk that a sludge leak could block the transfer pipes making the pre-treatment scheme inoperable.
6. Additional trucking operations daily to and from the proposed pre-treatment site will be necessary to transport, amongst other things, waste (sludge) generated from the process. This will add to road congestion, noise and infrastructure wear and tear in the area. Note that the amount of sludge produced at the Springvale WTF is at 50% dryness, rather than 5% (as stated in the Modification 6 Report (at page 53), i.e 10 times less volume.



If you have any questions or require any further information, please do not hesitate to contact me on 0417 550 746 or john.battaglia@veolia.com.

Yours sincerely

A handwritten signature in black ink, appearing to be "JB", with a long, sweeping horizontal line extending to the right.

John Battaglia
For and on behalf of Veolia Water Australia Pty Ltd