



Our reference: DOC14/57137 EF13/2546
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NSW Department of Planning & Infrastructure
GPO Box 39
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Attention: Mr Matthew Sprott

Dear Mr Sprott

**DRAYTON SOUTH COAL PROJECT (11_0062)
RESPONSE TO CONSEQUENTIAL ENVIRONMENTAL IMPACT ASSESSMENT
FOR RETRACTED MINE PLAN**

I refer to your email of 11 April 2014 requesting comment from the Environment Protection Authority (EPA) on the report titled "*Consequential Environmental Impact Assessment for Retracted Mine Plan*" (retracted mine plan), dated March 2014 and prepared by Hansen Bailey. This report has been submitted in accordance with the Drayton South Coal Project, application reference 11_0062 (the project).

The EPA also refers to your email of 15 April 2014 and attached document titled "*Review of air quality impact assessments for the Drayton South Coal Project*" (air assessment report) prepared by Jacobs SKM and dated 4 April 2014 in relation to the project.

The EPA notes the retracted mine plan involves the following:

- Reduction of mining boundary, involving a complete removal of the proposed Houston mining area and reductions in the extent of the Whynot and Redbank mining areas; and
- Operational and management modifications.

The EPA has assessed the reports referred to above and does not have any additional recommended conditions of approval to our previous recommended conditions for the project provided in our letter dated 20 December 2012.

In regard to the information provided in the retracted mine plan and air assessment report the EPA provides the following comments.

Air Quality

The air assessment report concludes on page 3 that there is an anticipated reduction in the total coal and overburden handled each year of the project. Page 11 of the report supports this premise as detailed below:

"As part of their assessment for the retracted mine plan PEL reviewed the reduced mine plan footprints and production schedules and compared these to the previous mine plans for which modelling has been

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undertaken. From this review they found that as there is an overall reduction in material movement across the Project for each year, in addition to the removal of the entire Houston mining area and visual bund and the reductions in the Whynot and Redbank mining areas, it would be expected that there would be an overall reduction in the predicted impacts for the Project when compared to the RTS modelling."

While the EPA agrees with those conclusions to a degree, the most significant reduction in materials handling will only occur after the 20 year predicted life of the mine. Regardless of the quantum of materials handled during the life of the project, the proponent must effectively manage remediation and other disturbed areas in order to maintain the reduction of airborne pollution.

The air assessment report calculates the potential value of reduced emissions at 700 tonnes per year (t/y) for an area of 200 hectares. When applied to the project specifics this value is approximately 1120 t/y when applied to the 320 hectare differential.

The air assessment report further concludes that reduced haulage of product will reduce emissions. This conclusion is sound, yet once again, it relies upon the management of those haul roads and exposed areas.

Noise

The EPA makes reference to the report "Appendix C – Acoustics Assessment Advice" (noise report) prepared by Bridges Acoustics and dated 6 March 2014. The noise report concludes the following:

"This review has indicated the retracted mine plan proposed by AAMC for the Drayton South Project is expected to result in very similar noise levels and blast impacts and continued compliance with relevant noise and blasting criteria at all receivers located generally south and south west of the Project area, including at all residences within the Coolmore and Woodlands Studs."

Based on the above, and noting the predicted reduction in noise levels and blasting impacts resulting from the revised mine footprint the EPA does not have any additions or amendments to our previous recommended conditions of approval dated 20 December 2012 in regard to noise.

If you require any further information regarding this matter please contact Peter Mathews on 4908 6868.

Yours sincerely



24.4.14

MICHAEL HOWAT
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Environment Protection Authority