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Matthew Sprott Department of Planning and Infrastructure 23-33 Bridge Street Sydney NSW 2000

11 November 2013

EN04281

Dear Matthew,

## Comments of PEL Responses to SKM Review Comments on the Drayton South Project Air Quality Impact Assessment

I have reviewed the responses to SKM's Peer Review of the Drayton South Project Air Quality Impact Assessment. These responses were prepared by Pacific Environment Limited (PEL) and dated 6 November 2013.

PEL has provided responses to all of SKM comments and most of these responses are accepted or deemed not significant to the outcomes of the assessment and therefore no additional information is being sought.

PEL also confirmed that the inconsistencies between the data presented in the main report and the data in the appendices (for example, comments 4, 5, 8, 9, 10 and 18) were either due to typographical errors or previous versions of inventories which were not updated.

The following item remains outstanding:

## Comment 20 (moisture and silt contents)

The PEL response confirms that there is variability in the silt content on haul roads at Drayton (between 0.7 and 1.6% in the October 2013 results). These results are higher than the value used in the RTS modelling (0.4% measured in February 2013). PEL has stated that the February 2013 and October 2013 results are similar, however the use of 0.7% instead of 0.4% would result in an emission 1.8 times higher from this (haulage) activity. PEL should quantify the likely range in total site emissions due to the variability in silt contents (from 0.4 to 1.6%), and comment on the potential implications in terms of predicted impacts.

PEL refers to recent bulk samples of overburden tests for silt and moisture content at two Hunter Valley mines and one in the Gunnedah area (an existing ACARP project). It was stated that the average silt content was 4.6% with a range between 1.2 and 9.6% (the RTS modelling was based on 1.8% silt content). It was also stated that the average moisture content was 5.6% with a range between 3.8 and 7.9% (the RTS modelling was

Drayton South Coal Project Adequacy of PEL Responses to SKM Peer Review November 2013



based on 10.9% moisture content). PEL estimated that the total site emissions would increase by less than 1% by using the average moisture content (5.6%). The same calculation should be done using the average silt content (4.6%) with a comment on the likely change in total site emissions and implications in terms of predicted impacts. A table which shows the results from the referenced bulk overburden tests for the Hunter Valley and Gunnedah sites should also be provided, to allow the Department of Planning and Infrastructure to check that they are satisfied with the interpretation.

Please contact me on 4979 2663 if you have any questions on these outcomes.

Yours sincerely

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