Presentation to PAC Public Hearing

3 February, 2015



Drinking Water

 No level of risk is acceptable in Sydney Water Catchment Special Areas



UEP Project Application Area

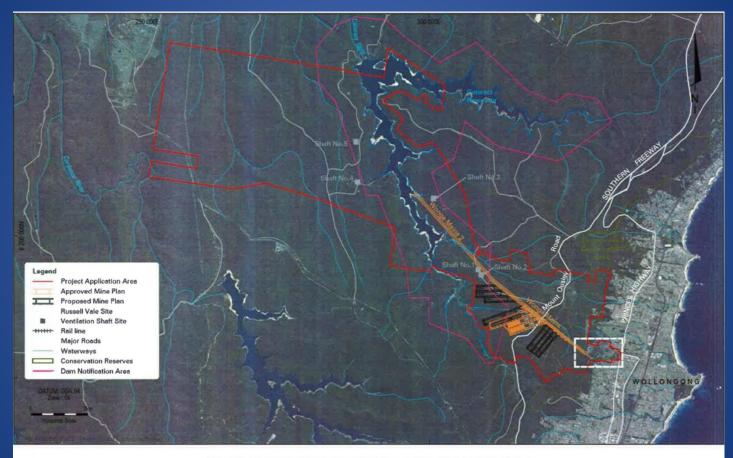


Figure 2: Proposed mining areas and existing workings at Russell Vale Colliery

Russell Vale Colliery Underground Expansion Project Preliminary Assessment Report, p 4

History of MODs under Preliminary Works Project

| Application | Date | Status | Purpose |
|------------------------------------|---|--|--|
| Preliminary Works Project (PWP) | 19/4/2010 | Determined | The NRE No. 1 Preliminary Works Project: - extracting up to 1 million tonne of run- of-mine coal a year from the Bulli and Wongawilli coal seams for a period of up to 3 years using pillar extraction mining methods; |
| SMP Longwall 4 | Used transitional legislation Early 2012 | "Approved" & carried out. Basis of approval was of questionable legality. | Long mining of Wonga East Iongwall 4 |
| Preliminary Works Project MOD 1 | Exhibited 13 Aug to 3 Sept 2012 | Completed. Determination 24/12/2012 | Longwall mining of Wonga East Iongwall 4 & 5 |
| Preliminary Works Project MOD 2 | Exhibited 22 Aug to 13 May 2014 | Approved 19/11/2014 | Longall mining of first 400m of Wonga East longwall 6 |
| Preliminary Works Project MOD 3 | Not exhibited. Public not notified. Community Consultative Committee not notified. | Determination made by DoPE 10/10/2014 – Approved | Extension of time for PWP to 31 December, 2014 |

Previous PAC comments on Piecemeal planning and approval process at Russell Vale Colliery

PAC
 Determination NRE No 1
 Colliery,
 Preliminary
 Works Project
 p. 3, 13/10/11

".....the Commission considers that separation of project applications where the primary purpose of the first is to facilitate the second could lead to lack of public confidence in the NSW assessment and regulatory systems and must be considered undesirable. " Previous PAC comments on Piecemeal planning and approval process at Russell Vale Colliery (cont)

PAC Determination -NRE No 1 Colliery, Preliminary Works Project, Mod 1, 3/12/2012, p. 9

"The Commission notes the considerable disquiet expressed by Community groups, government agencies and Wollongong City Council on a range of matters including.....the piecemeal approach to assessment of this mining project....." Previous PAC comments on Piecemeal planning and approval process at Russell Vale Colliery (cont)

PAC Determination
– Russell Vale
Colliery,
Preliminary Works
Project MOD 2
19.11.2014

"The Commission is put in a very difficult position.....it shares objectors concerns in regard to the piecemeal approach to gaining planning approval."

Piecemeal applications, Modifications and Boundaries

- If approved, this approval should include a condition that there are no modifications allowed for additional longwalls
- The Project Approval area should not include Wonga West area
- Any expansion of mining beyond the 8 longwalls included in the UEP PPR application should take place under a new application under Part 4 of the Environmental Planning and Assessment Act, with the additional requirements and stricter conditions that this would entail.

Proposed Western Boundary of Project Area (in red)

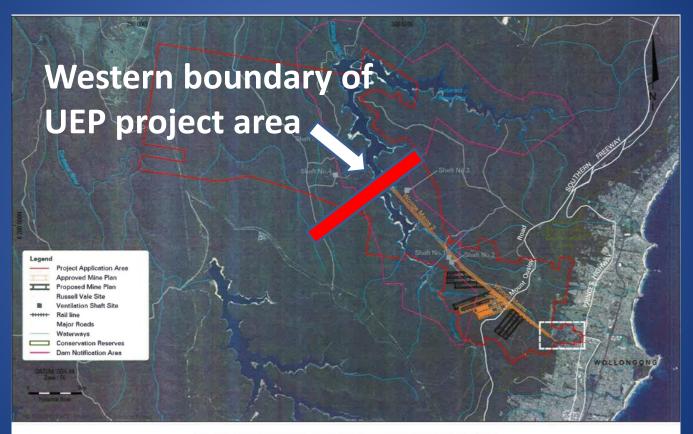


Figure 2: Proposed mining areas and existing workings at Russell Vale Colliery

Spot the difference

Dendrobium Colliery



Tahmoor Colliery



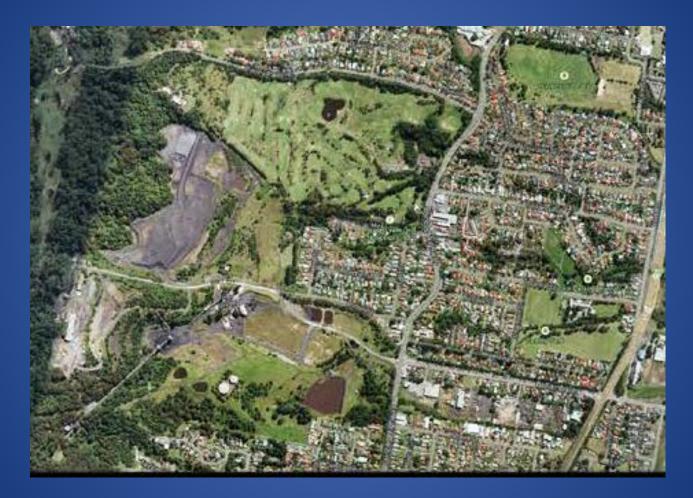
Metropolitan Colliery



Russell Vale Colliery



Air quality



Aerial view of Russell Vale Colliery site

Climate Council Joint Statement on the Health Effects of Coal in Australia

The first two of four key findings:

- Coal mining and burning coal for electricity emits toxic and carcinogenic substances into our air, water and land.
- Coal pollution is linked to the development of potentially fatal diseases and studies show severe health impacts on miners, workers and local communities.

Available at: https://www.climatecouncil.org.au/health-effects-of-coal

Air quality "Mitigation Measures", EAR, p53, Fact or Fiction?

Mitigation Measures

Wollongong Coal has implemented a range of air quality mitigation measures associated with the existing mining operations. These measures include:

- decommissioning the Balgownie belt and bins and the Bulli decline belt;
- construction of a new stackout conveyer and tripper system;
- covering coal conveyors to the stockpile area;
- installation of an automatically controlled stockpile spray system;
- use of mobile water trucks;
- a new truck washing facility used by all trucks prior to departure from the site x
- covering all loads prior to leaving the site;
- sealing pit top truck haulage roads and parking areas;
- the use of a bobcat mounted road sweeper on all sealed areas;
- the use of fixed water sprays on surface and underground coal conveyors; and
- operating a comprehensive air quality management system, including 12 dust deposit gauges (DDGs) and two real-time high volume air samplers (HVASs).



Five of the 11 measures "implemented" according to the Department, either never happened or are just ineffective tokens

| DoPE claim, EAR, p 56 | Reality |
|---|--|
| decommissioning the Balgownie belt and bins and the Bulli decline belt; | the Balgownie belt is not decommissioned and can still be used during the day,. Mod 1 of the Preliminary Works Project permits this. |
| construction of a new stackout conveyer and tripper system; | |
| covering coal conveyors to the stockpile area; | the conveyors to the stockpile are not fully covered. 70% of the conveyors are now called trippers and cannot be covered. These are same trippers that are causing all the noise at present and there is another 280m of trippers still to be built |
| installation of an automatically controlled stockpile spray system; | |
| use of mobile water trucks; | |

| DoPE Claim, EAR p. 56 | Reality |
|---|---|
| a new truck washing facility used by all trucks prior to departure from the site; | the truck wash facility exists but is ineffective. Trucks drive thru it at speed and do not stop, so the sprays continue washing nothing. |
| covering all loads prior to leaving the site; | covering all loads is left up to the truck driver. A GNRE staff member told the community at an information day, that GNRE cannot control whether the drivers cover their loads or not. |
| sealing pit top truck haulage roads and parking areas; | the carpark areas are not sealed and the trucks drive on unsealed coal dust roads. |
| The use of bobcat mounted road sweeper on all sealed areas | This is ineffective as most roads and areas are not sealed |

| DoPE Claim, EAR p. 56 | Reality |
|--|---------|
| The use of fixed water sprays on surface and underground coal conveyors | |
| Operating a comprehensive air quality management system, including 12 dust deposit guages)DDGs) and two real-time high volume air samplers (HVASs) | |

A recent study estimates that Russell Vale Colliery emits 779 tonnes of particulate matter pollution (coal dust and particles) per year.

 Per tonne of coal extracted, Russell Vale mine's air pollution is estimated as being 165 times greater than that of Dendrobium mine, a nearby mine south of Wollongong. NRE No 1 Colliery Particulate Matter Control

Ref: Best Practice Pollution Reduction Program, PAE Holmes, 25 October, 2012, p. 10. See <u>Dust Pollution Reduction Program</u> Dendrobium emissions sourced from <u>Dendrobium Mine Particulate Matter</u> <u>Control Best Practice Pollution Reduction Program</u>, 2 February, 2012

Estimated emissions for Russell Vale Colliery

| Mining Activity | TSP (tonnes/year) | PM ₁₀ (tonnes/year) | PM _{2.5} (tonnes/year) |
|---|----------------------|-----------------------------------|------------------------------------|
| Wheel generated particulates on unpaved roads | 11 | 3 | 0 |
| Wind erosion of coal stockpiles | 670 | 335 | 50 |
| Trucks unloading coal | 49 | 4 | 1 |
| Graders | 0 | 0 | 0 |
| Material transfer of coal | 45 | 5 | 1 |
| Screening | 3 | 1 | 0 |
| Total | 779 | 348 | 52 |

Table 2.3: Summary of PM emissions with current controls in place

Estimated emissions for Dendrobium Colliery

| Table 2.3: Estimated controlled emissions | | | |
|--|---------------------|------|-------|
| PRP activity | TSP (tonne/year) | PM10 | PM2.5 |
| Loading coal to the stockpile | 1.5 | 0.70 | 0.10 |
| Working the stockpile by bulldozer/loader | 31.9 | 9.5 | 0.7 |
| Wind erosion from the stockpile | 40.8 | 20.4 | 3.1 |
| Loading coal to trains | 0.4 | 0.2 | 0.03 |
| Ventilation fans | 4.5 | 3.1 | 3.9 |
| Movement of vehicles into and out of the Nebo Portal | 1.3 | 0.2 | 0.06 |
| Total | 80.4 | 34.1 | 7.9 |

Stockpiles on Colliery site

- Two new coal stockpiles of 140,000 tonnes
- Added to the existing 80,000 tonne stockpile this will bring total stockpiling on site to 360,000 tonnes.



- All the recommendations of the PAE Holmes Report should be implemented before any mining begins under this UEP.
- Proponent should be required to lease more space at Port Kembla Coal Terminal to stockpile their coal, NOT increase stockpiling at Russell Vale Colliery

Transport of coal

- 17 laden trucks per hour means 34 truck trips from the Colliery to Port Kembla Coal Terminal each hour
- One truck every 104 seconds
- Or more than one truck every 104 seconds in "emergencies".
- Definition of "emergency" when a ship is in port



Transport of coal

• There has to be another way







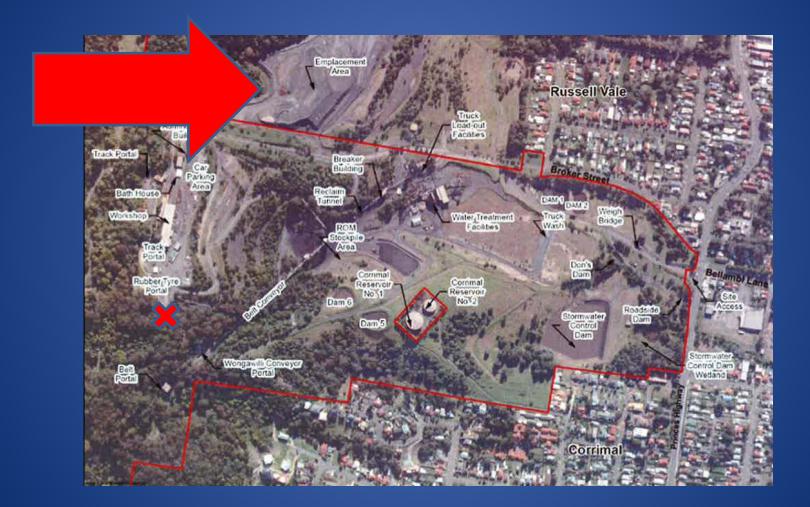
Noise level application

Back ground noise levels (PWP scenario) Historical noise levels (Previous washery) Suburban/industrial interface(Predating res area) Noise Report Contours and topography not consider Sensitive receivers to perimeter of site not in residential areas Example of WC's commitment Sound walls required under PWP Mobile plant reversing alarms



 Noise levels should be based only on background noise as per the original PWP. The supposed "Washery noise" and the Suburban Industrial interface are invalid and should not be used as excuses for increasing the noise about levels specified in the PWP.

Emplacement Area



Emplacement Area

Emplacement area under PWP

Was never mentioned

Reject coal disposed of on site

Emplacement Area under UEP

EA states: "There is no intention to use this emplacement area as part of this project."

Reject coal will be disposed of on site

But it is never that clear cut with WC 🕐

Emplacement Area under MPA

WC has no intention of using this area under the UEP but would continue to use it under the existing Council consent.



• All dumping on the emplacement area should cease in the UEP, as specified in the EA

ROM Coal



ROM definition

"Raw coal as mined that has not undergone any screening, crushing or washing."

PWP ROM coal is crushed and dumped into a screen with mobile plant

UEP ROM coal will be screened at various locations and crushed in a huge new crushing and sizing plant.



- Coal should not be processed in any way on site.
- If the colliery is unable to export ROM coal, production should cease.

Production Rate of Coal

| Table 1: Major comp | ponents of the Russell Vale Preferred Underground Expansion Project |
|---------------------|---|
| Aspect | Preferred UEP Project |
| Project Summary | Continued longwall mining operations to extract 4.7 Mt of ROM coal from the Wongawilli Seam in the Wonga East area over a period of 5 years; Upgraded and continued operation of the pit top area, support facilities and utilities; Continued minimal processing (sizing and screening) of up to 3 Mtpa of ROM coal at the pit top area; Continued exploration activities, environmental monitoring an maintenance of access to the existing underground workings and surface infrastructive within exploration and mining tenements in the Wonga West domain; Continued transport of ROM coal from the mine by road to the PKCT for export; and Disposal of coal rejects adjacent to the mine site and rehabilitation of the site. |

EAR, p. 6

PRODUCTION RATE Production of 3 million tonnes per annum The 3mt of coal per annum is a historical figure Extraction schedule in PPR do not justify this figure Pit top infrastructure not completed for 5.5 years after approval



Production Rate of Coal

- Limit extraction, processing and transport of coal to 1 mtpa;

Conclusions

- This application should be rejected.
- There should be an independent investigation into the many inaccuracies and misleading statements in the Major Project Assessment.

Thank you.