



23 October 2018

Secretariat  
Independent Planning Commission  
Level 3, 201 Elizabeth Street  
SYDNEY NSW 2000

**Attention: David Koppers**

Dear David,

**RE: CLEAN TEQ SUNRISE PROJECT OPTIMISATION MODIFICATION (MOD4) – COMMUNITY CONCERNS RAISED DURING THE PUBLIC MEETING**

Following the Independent Planning Commission (IPC) public meeting for the Clean TeQ Sunrise Project Modification 4 on 16 October 2018, Clean TeQ Holdings Limited (Clean TeQ) wishes to provide the IPC some additional information in response to some concerns raised by the community in the meeting. Clean TeQ notes that it will provide a separate response to community written submissions once they are made available on the IPC website.

While the concerns raised in the public meeting were generally consistent with previous Modification 4 submissions and therefore have already been addressed in Clean TeQ's Response to Submissions and the Department of Planning and Environment's (DP&E) environmental assessment report, Clean TeQ would like to reiterate key points related to these concerns.

Clean TeQ will provide a separate response to the concerns raised by the Lachlan Shire Council, Parkes Shire Council and the Forbes Shire Council during their briefing with the IPC.

#### ***Recommended Development Consent – Air Quality and Noise Related Conditions***

- The Air Quality and Greenhouse Gas Assessment (Ramboll Environ, 2017) and Noise and Blasting Assessment (Renzo Tonin & Associates, 2017) (including consideration of meteorological conditions) were prepared in accordance with the relevant New South Wales policies – *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (Environment Protection Authority [EPA], 2016) and the *Industrial Noise Policy* (EPA, 2000).
- The EPA raised no concerns with the Air Quality and Greenhouse Gas Assessment and Noise and Blasting Assessment in its submission on Modification 4.
- The recommended Development Consent conditions are consistent with the *Voluntary Land Acquisition and Mitigation Policy* (NSW Government, 2018).

#### ***Air Quality Management and Monitoring***

- The recommended Development Consent conditions address concerns raised by community members:
  - Continuous and real-time monitoring of the sulphuric acid plant in-stack concentration is required in the Air Quality Management Plan (Condition 23, Schedule 3). Real-time monitoring of the sulphuric acid plant in-stack concentration will allow Clean TeQ to implement proactive air quality management measures.
  - Regular reporting on the environmental performance of the Project (including monitoring results) on the Clean TeQ website (Condition 9, Schedule 5).

- Confirmation that stack emissions comply with relevant criteria and best practice emission concentrations using an updated air quality model is required as part of the Air Quality Verification Report to the satisfaction of the EPA (Condition 24A, Schedule 3).

### ***Project Borefield Management***

- Modification 4 would not change the approved Project borefield and associated groundwater impacts.
- Modification 4 includes the addition of licensed surface water extraction from the Lachlan River. Supply of surface water from the Lachlan River would reduce demand on the Project borefield, resulting in reduced groundwater extraction.
- The existing Development Consent requires a Groundwater Management Plan to be prepared in consultation with the Department of Industry – Land and Water and EPA and to the satisfaction of the Secretary of the DP&E that addresses concerns raised by community members (Condition 30[c], Schedule 3):
  - groundwater assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts associated with the development in the vicinity of the Project borefield;
  - a program to monitor and report on the impacts of the development on the groundwater supply of any potentially affected landholders; and
  - a plan to respond to any exceedances of the groundwater assessment criteria, and mitigate any adverse impacts of the development.

The DP&E recommended no change to the existing Groundwater Management Plan condition as a result of Modification 4.

- As part of the preparation of the Groundwater Management Plan, Clean TeQ has conducted a bore census to identify groundwater users in the vicinity of the Project borefield and commenced development of a contemporary groundwater model.
- The existing Development Consent requires a compensatory water supply to be provided to anyone whose basic landholder water rights are adversely and directly impacted as a result of the development in consultation with the Department of Industry – Land and Water and to the satisfaction of the Secretary of the DP&E (Condition 28, Schedule 3).

### ***Mine Site – Potential Groundwater Impacts***

- Modification 4 would not change the approved open cut pits and associated groundwater impacts.
- Modelling of the modified tailings storage facility (Coffey, 2018) demonstrated that the potential seepage impacts would meet the relevant *NSW Aquifer Interference Policy* (NSW Government, 2012) minimal impact consideration criteria.

### ***Road Transport – Potential Amenity Impacts***

- Modification 4 would not change the approved operations phase road transport activity operational hours (i.e. 24 hours per day).
- The Road Transport Assessment (GTA Consultants, 2017) concluded that Modification 4 would have no significant impacts on the performance, capacity, efficiency and safety of the road network.
- The Noise and Blasting Assessment (Renzo Tonin, 2017) concluded that no exceedances of the relevant road noise criteria would be expected.

- The recommended Development Consent requires a Traffic Management Plan to be prepared in consultation with the Roads and Maritime Services and the Councils and to the satisfaction of the Secretary of the DP&E that must include reasonable and feasible measures to minimise amenity impacts to local communities, including minimising night time truck movements and compression braking in urban areas as far as practicable (Condition 45, Schedule 3).

***Compliance with Development Consent Conditions***

- The existing Development Consent requires Clean TeQ to assess and manage Project-related risks to ensure there are no exceedances of the criteria and performance measures in the Development Consent (Condition 3, Schedule 5).
- The existing Development Consent provides for community members that consider that the Project is exceeding Development Consent criteria to request the Secretary of the DP&E for an independent review of the Project impacts (Condition 1, Schedule 4). The independent review must be commissioned by Clean TeQ and undertaken by a suitably qualified, experienced and independent person approved by the Secretary of the DP&E.

***Potential Cumulative Impacts***

- Environmental Assessment Requirements for the proposed Flemington Project and Owendale Project were issued after the submission of the Modification 4 Environmental Assessment.
- The Environmental Assessment Requirements for these projects require that the Environmental Impact Statements for these projects consider the potential cumulative impacts with “other mining developments in the locality” such as the Clean TeQ Sunrise Project.

***Development Consent Conditions***

Should the IPC elect to review the recommended Development Consent conditions, Clean TeQ respectfully requests an opportunity to comment on any proposed amendments to the recommended Development Consent conditions prior to the IPC’s determination.

Please contact the undersigned if you have any queries regarding the above.

Yours sincerely,

**CLEAN TEQ HOLDINGS LIMITED**



**JOHN HANRAHAN  
APPROVALS LEAD – CLEAN TEQ SUNRISE PROJECT**