



31 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) – CONCERNS RAISED IN WRITTEN SUBMISSIONS

Clean TeQ Holdings Limited (Clean TeQ) has reviewed the written submissions to the Independent Planning Commission (IPC) on the Clean TeQ Sunrise Project Modification 4 application.

The following information is additional to that provided in responses and submissions made to the IPC and DP&E to date. It is provided to clarify residual concerns with noise criteria, tailings storage design, traffic movements, hazards and risk management and the limestone quarry.

Should the IPC elect to amend the recommended Development Consent conditions, Clean TeQ respectfully requests an opportunity to comment prior to the IPC's determination.

Recommended Development Consent – Sleep Disturbance Noise Criteria

- Clean TeQ notes that sleep disturbance criteria were not previously included in the Development Consent (i.e. the inclusion of the sleep disturbance criteria is a new requirement consistent with current NSW Government policy).
- The sleep disturbance criteria included in the recommended Development Consent conditions are consistent with *NSW Road Noise Policy* (Department of Environment, Climate Change and Water, 2011).

Tailings Storage Facility and Diversions Design

- The tailings storage facility will be designed, constructed and operated in accordance with the Dam Safety Committee's requirements (Condition 29, Schedule 3). The Dam Safety Committee is responsible for the administration of the NSW *Dams Safety Act 1978*.
- The diversions will be designed in accordance with the Development Consent requirements (Condition 29, Schedule 3) and a detailed description of the diversions will be included in the Surface Water Management Plan (Condition 30[b], Schedule 3). As the Department of Industry – Lands and Water and the Environment Protection Authority are responsible for the administration of the NSW *Water Management Act 2000* and NSW *Protection of the Environment Operations Act 1997*, Clean TeQ will consult with both entities during the preparation of the Surface Water Management Plan.

Hazards Management

- The Preliminary Hazard Analysis concluded:
 - The risks of irritation, injury and fatality were found to comply with the relevant criteria both at the site boundary and the nearest private residence.
 - Societal risk, area cumulative risk, propagation risk, transport risk and environmental risk were concluded to be acceptable.
- The Modification includes the removal of the counter current decantation processing method which would eliminate the hazard events associated with the production of hydrogen sulphide, hydrogen and nitrogen (e.g. gaseous releases of hydrogen sulphide).
- The recommended Development Consent requires the preparation and implementation of the following management plans and studies which aim to reduce the likelihood and/or consequences of potentially hazardous incidents:
 - Pre-construction:
 - Fire Safety Study;
 - Final Hazard Analysis;
 - Construction Safety Study; and
 - HAZOP.
 - Pre-commissioning:
 - Transport of Hazardous Materials Study;
 - Emergency Plan; and
 - Safety Management System.

Real-Time Particulate Monitoring

- Clean TeQ will undertake real-time particulate matter monitoring in accordance with the requirements of the Environment Protection Licence.
- The real-time particulate matter monitoring will be undertaken in accordance with the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales* (Department of Environment and Conservation, 2007) and relevant Australian Standards (e.g. using a TEOM or BAM).

Trundle Bypass

- The Bogan Way is suitable for the modified Project traffic because it:
 - is part of the existing arterial/regional road network;
 - has adequate capacity to accommodate the Project heavy vehicles;
 - has suitable geometry – priority at intersections, avoids sharp turns; and
 - is approved to carry Project heavy vehicle types.

- The Pedestrian Access Review found:
 - the existing pedestrian and vehicular environment in Forbes Street is generally satisfactory, with no major issues which would require immediate upgrading to meet current standards; and
 - that it is unlikely that a significant deterioration in the safety of the existing pedestrian and vehicular environment would result with the modified Project.
- The Road Noise Assessment found that there would be no exceedances of relevant noise criteria in Trundle as a result of the modified Project.
- A bypass would remove a relatively minor number of heavy vehicles from Trundle (maximum of 70 movements per day – assuming the maximum amount of limestone is transported from external suppliers).
- If a bypass was to be required, use of it would potentially result in amenity impacts (e.g. road noise and dust) at residences located on roads that do not currently experience significant traffic volumes and are likely to be inadequate for the Project heavy vehicles.

Fifield Bypass

- Modification 4 would not change the approved Fifield Bypass.
- Modification 4 would reduce the overall total Project traffic by approximately 34%.
- In accordance with the terms of the Voluntary Planning Agreement, a road safety audit would be conducted to determine if the Fifield Bypass is required. If the road safety audit determines that the approved Fifield Bypass is required, Clean TeQ will construct and use the approved Fifield Bypass.

Limestone Quarry Site Ownership

- Modification 4 would not change the approved Project limestone quarry.
- Clean TeQ acknowledges that it does not own all of the limestone quarry site.

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