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Nature Conservation Saves for Tomorrow

Independent Planning Assessment Commission

[submitted via email - ipcn@ipcn.nsw.gov.au]

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AMENDED MODIFICATION FOR SPRINGVALE WATER TREATMENT PLANT - MOD11

The Blue Mountains Conservation Society (the Society) is a community-based volunteer organisation with over 900 members. Our mission is to help protect, conserve and advocate for the natural environment of the Greater Blue Mountains. In fulfilling its mission the Society advocates for the protection of the Greater Blue Mountains World Heritage Area.

The Springvale water treatment plant (SWTP) was approved to treat mine waste water from Springvale and Angus Place mines and reuse it in Mt Piper Power Station (MPPS) cooling towers. This was to protect Sydney's drinking water catchment (SDWC). Its consent in 2017 shows it has to operate as a zero discharge system. The SWTP has achieved significant environmental protection as the assessment report by Department of Planning, Housing and Infrastructure (DPHI) recognises. The plant's operation also protects the Greater Blue Mountain World Heritage Area (GBMWA) from the mine's discharges to the Cocks River.

Comments on the amended modification for SWTP MOD11 and associated documents

Amended modification for SWTP MOD11

The amended modification for the Springvale Water treatment plant MOD11 is an improvement on the earlier proposed MOD11 sought by Centennial Coal. The first proposal was huge overreach. The revised amendments now have

- removed the open-ended timeframe for mine water discharges and restricted this discharge to the one planned outage in April and May 2025;

- defined in the actual consent the composition of the mine water which can be transferred to Thompsons Creek Dam (TCR) during the identified planned outage;
- limited the volume of daily transfers;
- removed the potential for large mine water transfers by inserting a daily upper volume limit which is the minimum volume required by the existing Energy Australia water access licence for TCR,
- introduced two trigger points to notify increasing salinity in TCR at 550 microsiemens/cm and to cease transfers if a risk of reaching 600 microsiemens/cm.

These are issues which the Society raised in its earlier submission.

This transfer should be much more controlled than the previous “interim water management’ modifications. However, there are environmental issues which are not being addressed.

The amended MOD11

- still allows salinity to increase to levels pre-dating the operation of SWTP. This is not appropriate to meet NORBE test which, while not mandatory for a modification, is considered best practice for water discharges particularly which feed into SDWC areas;
- reduces the maximum salinity allowed but does not explain why this level was chosen;
- does not address impacts from heavy metals/ minerals which are typically found in mine waste water. There is no pollution control of this discharge (to Thompsons Creek Reservoir) as part of the proposed amendment. “environmental flows” should not contain high salinity or mine water levels of heavy metals.

SWTP MOD11 Assessment Report March 2025

It is disappointing to see that water quality can only be maintained at “historical levels”. The assessment report shows water quality was “historically poor” pre SWTP but ‘material improvement’ of salinity levels has been due to SWTP. [p.7] We believe that ‘historical’ [p.15] (pre SWTP operating) is not a suitable goal even though this is a one-off event. A permanent solution is needed as the expert panel emphasises.

The report also states that Centennial Coal’s alternatives to MOD11 were not feasible but stresses the need for Centennial to find alternative solutions. [p18]

Independent Expert Advisory Panel for Mining (IEAPM) Report

The Society welcomes the advice from expert panel commenting on further issues that need to be addressed in relation to this modification: These include circulation of impounded water; lack of knowledge of minerals and heavy metals in the proposed discharges; the practical need for a wet weather contingency plan. There is also the

critical issue of how to keep the SWTP operating during future outages of MPPS. The Society and the public want to have SWTP continue to operate as the zero discharge it has been approved to be.

Managing water circulation in dams was not addressed in Centennial's application even though it is a common issue with dam management. This potentially impacts on the salinity levels and where they are recorded. It demonstrates how modifications can be proposed with insufficient identification and assessment of relevant issues.

The future

The biggest issue is how to prevent this current Mod becoming just one more interim solution. There have been a series of interim water management modifications allowing poorly treated mine water to be discharged into TCR and two further applications withdrawn from May 2019 to October 2023. The amended modification 11 is a step up in regulation and should be a gamechanger.

The critical issue still for SWTP is how to have the SWTP operating as the zero release operation approved in 2017 even when MPPS is not operating. The stop gap series of MODS is not an appropriate solution. Centennial Coal needs to have a feasible plan to achieve this.

There is also the issue of how to manage excess mine water from Springvale and Angus Place mines which are beyond the capacity of SWTP. Adding to SWTP's capacity or bringing in a temporary water treatment plant as Centennial Mine has done at other mines are options. There are also alternate water management strategies. South Tahmoor Mine, for instance, has been allowed to store excess brine temporarily in underground mine spaces. It is understood that Centennial has already been allowed to expand its underground storage capacity.

Beyond the existing situation, there are a number of future proposals which rely on the SWTP.

- MOD 12 for the SWTP has not yet submitted but it is understood that Centennial Coal wants to discharge mine waste water to Wangcol Creek (and thence Cocks River and Sydney's Drinking Water catchment). If this proposal is submitted it could undermine the environmental improvement of the SWTP.
- Angus Place West mine proposal is still expected later this year.

Keeping SWTP plant working to capacity, managing brine streams and within consent conditions during an outage will be challenged without a solution to achieving this. MPPS will have more planned and unplanned outages. This is a critical issue for the future operations of SWTP and environmental protection.

It is recommended that Centennial be required to provide a plan to keep SWTP operating during future MPPS outages, and, as a matter of urgency, a plan for the next outage.

Yours sincerely

A handwritten signature in dark ink, appearing to read "A. Cam". The signature is fluid and cursive, with a prominent initial "A" and a trailing "Cam".

Annette Cam
President
Blue Mountains Conservation Society