



Rob Williamson
General Manager
Broken Hill Operations Pty Ltd - Rasp Mine
PO Box 5073
BROKEN HILL, NSW 2880

Dear Mr Williamson

Rasp Mine – Proposed Modification (MOD 4)

I refer to your preliminary information paper dated August 2016 regarding the proposed modification of the Rasp Zinc-Lead-Silver Mine project approval (PA 07_0018). The modification includes:

- increasing the capacity of the existing Blackwood Pit tailings storage facility (TSF2) by constructing embankments and a retaining wall at low points along its perimeter; and
- constructing and operating an on-site concrete batching plant for the manufacture and use of fibrecrete and concrete at the mine.

Based on the information provided, the Department confirms that the proposed activities can be characterised as a modification to the existing approval and can be assessed and determined under Section 75W of the *Environmental Planning and Assessment (EP&A) Act 1979*.

The Department will not be issuing formal Environmental Assessment Requirements for the proposed modification. In addition to any issues identified in your preliminary information paper and that may be raised in consultation with key agencies, **Attachment 1** provides specific advice on key areas of consideration by the Department for the assessment of the modification.

In preparing the Environmental Assessment (EA), you must undertake consultation with the NSW Environment Protection Authority (EPA) to confirm that the proposal meets requirements of the relevant policies and guidelines, particularly in relation to noise and dust.

Additionally, the Department also requires you to consult with the Division of Resources and Energy within the Department of Industry, the Dam Safety Committee, NSW Health, the Department of Primary Industries and Broken Hill City Council.

If you wish to discuss this matter further, please contact Elle Donnelley on (02) 9228 6340.

Yours sincerely

15/9/16

Clay Preshaw
A/Director
Resource Assessments

ATTACHMENT 1 KEY ISSUES FOR CONSIDERATION

MINE PLAN

- A strong justification will need to be provided, including consideration of alternatives, in relation to all aspects of the proposed modification, including the:
 - need to undertake additional underground mining development;
 - proposed design of the TSF2 embankments and retaining wall;
 - reasons the approved TSF1 is an unviable option for tailings storage; and
 - proposed location of the concrete batching plant.
- Include a revised materials balance accounting for the storage of additional waste rock underground and all tailings material within TSF2 (rather than storing both tailings and waste rock underground as proposed in the original EA).

AIR QUALITY

- Include detailed management measures that would be used to prevent tailings within the modified TSF2 from drying out and generating dust. The measures proposed and presented in the EA must be developed in consultation with the EPA.

HEALTH

- The EA must demonstrate that the proposed modification would not increase the potential for lead exposure in the community.

CONSTRUCTION NOISE

- Construction of the concrete batching plant and the TSF2 embankments and retaining wall are classified as construction activities. The EA should include an assessment of the likely construction noise impacts of these activities under the *Interim Construction Noise Guideline*.

SURFACE WATER

- Include details of changes to the surface management system and identification of the modifications required to the mine soil and water management plan (if applicable).
- Include details of raw water supply and use, including existing raw water consumption and proposed consumption associated with the modification. Provide details about the improvements in water use and consumption that have reduced raw water usage to date.

REHABILITATION

- Include details of the revised rehabilitation strategy and proposed final landform, specifically in relation to the modified TSF2.

GENERAL

- Ensure that project scheduling is clearly defined in the EA, providing details of proposed construction timeframes associated with the concrete batching plant and the TSF2 embankments and retaining wall. Potential cumulative impacts must be assessed if construction activities are expected to overlap.
- As the modification is a standalone document, rather than state that impacts were assessed in the original EA and reference this document, sufficient detail from the original project EA will need to be included in the modification EA to describe overall project impacts.
- Adequate justification will be required to justify the level of assessment undertaken for minor environmental impacts.
- Identify any proposed changes to the Environment Protection Licence requirements.