



## **Galong – MOD6 Kiln Coal Stockpile - Modification Report**

**Graymont (NSW) Pty Ltd**

**Galong Limestone Mine and Kiln**

**Galong, NSW**

**SAA240021.01**

**14 June 2024**

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## 1 INTRODUCTION

### 1.1 Existing Operations

Galong Limestone Mine & Kiln is located at 342 Eubindal Road, Galong, NSW shown in Figure 1.

Galong Limestone Mine & Kiln has operated since the 1900’s and produces limestone and quicklime. Graymont (NSW) Pty Ltd (Graymont) operates Galong Limestone Mine & Kiln generally within the Project Boundary (combined Mining Leases 1496 & 1745 issued under the *Mining Act 1992*).

Development Consent DA T2003-025 granted by the now Hilltop Council in 2003, authorises limestone mining operations and related processing and dispatch activities. A State Significant Development Application DA-317-7-2003-i was approved in 2003 by (the now) Department of Planning, Housing and Infrastructure (DPHI) under the former Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act), to construct and operate a limestone kiln to produce 150,000 tonnes per annum of quicklime at the Galong Limestone Mine.

### 1.2 Applicant

The applicant’s details are outlines in **Table 1**.

**Table 1. Applicants Details**

<b>Name</b>	Graymont (NSW) Pty Ltd
<b>ABN</b>	34 004 776 989
<b>Address</b>	Level 9, 118 Mount Street, North Sydney NSW 2060
<b>Contact Name</b>	Michelle Muir
<b>Contact Email</b>	Michelle.muir@graymont.com
<b>Contact Number</b>	0429 985 534

### 1.3 Purpose

On behalf of Graymont, Epic Environmental Pty Ltd (Epic) has prepared this Modification Report to support a modification to DA317-7-2003-i (MOD6) under Section 4.55(1A) of the EP&A Act.

This Modification Report has generally been prepared in accordance with ‘State Significant Development Guidelines – Preparing a Modification Report’ (MOD Report Guidelines) as updated October 2022. The purpose of the modification report is to assess, where relevant, the economic, environmental and social impacts of a proposed modification.

### 1.4 Modification Description and Need

Graymont is seeking to modify development approvals DA-317-7-2003-i to permit an extension of the time period over which a temporary 10,000 t coal stockpile (Stockpile) can remain within the area approved to be disturbed under DA T2003-025.

The Stockpile was expected to be removed by 30 June 2024 (as per Modification Report submitted in support of DA-317-7-2003-i MOD4). However, due production issues in 2023 and reduced kiln operation, the Stockpile was not depleted at the rate originally planned. Therefore, Graymont is seeking a time extension for Stockpile depletion until 30 June 2026.

No other changes are proposed to the existing enclosed 200 t coal stockpile building or any other approved element or existing activities.

MOD 6 will allow Graymont to deplete the coal stored on the Stockpile over an extended but time-limited period.



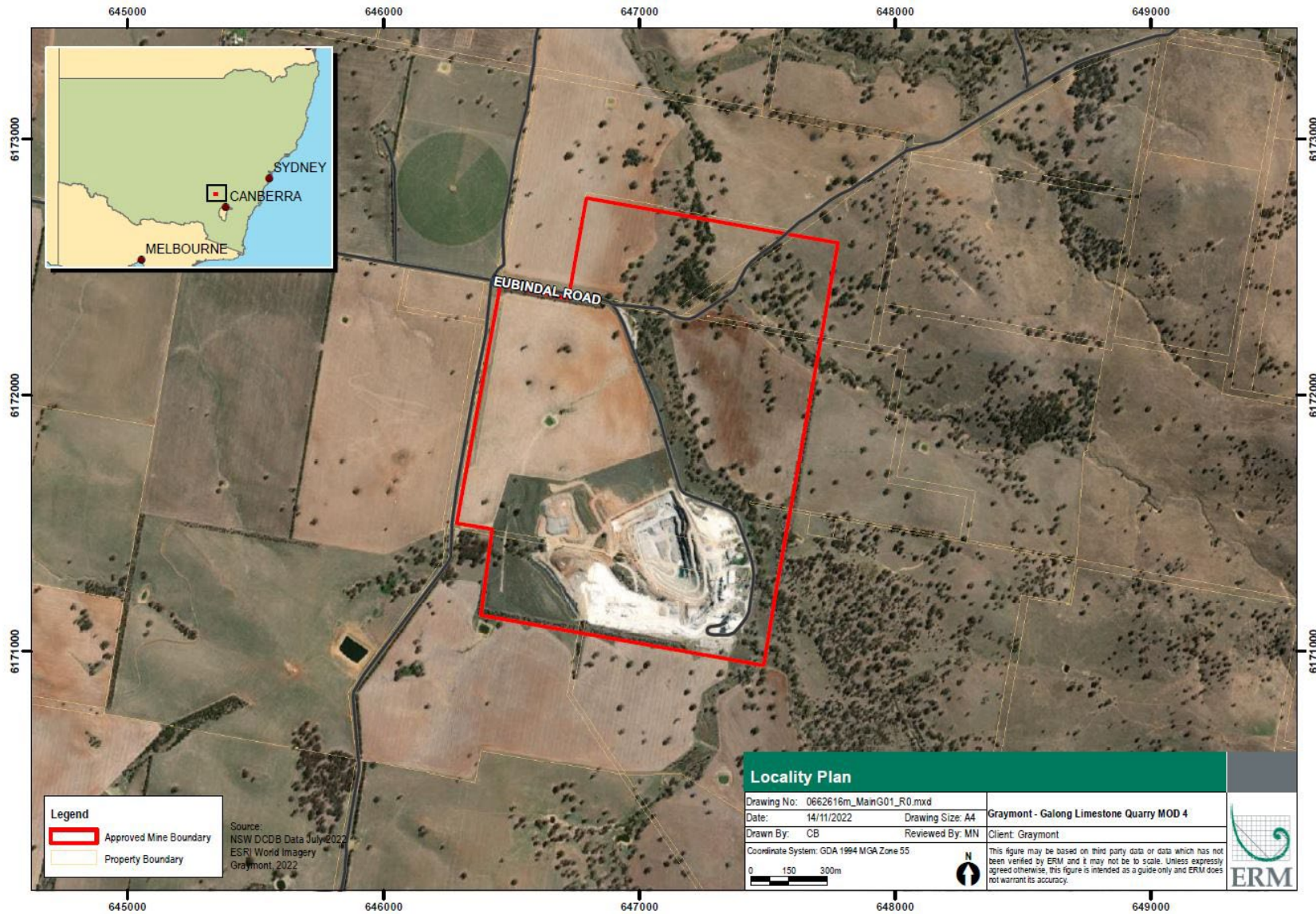


Figure 1. Locality Plan (ERM 2022)

## 1.5 Structure

This Modification Report is structured as follows:

- **Section 1:** introduces MOD6, the applicant and document's purpose
- **Section 2:** provides the strategic context
- **Section 3:** describes the construction and operational activities for which MOD6 is sought, as well as alternatives considered
- **Section 4:** provides the statutory context
- **Section 5:** describes stakeholder engagement activities
- **Section 6:** assesses the impacts and lists any required mitigation or management measures
- **Section 7:** provides a MOD6 justification and conclusion



## 2 STRATEGIC CONEXT

This section provides a description of the strategic context of MOD6 including the existing Galong Limestone Mine & Kiln, key features, surrounding land use, natural and built features land ownership, cumulative considerations, and government strategies and programs. It also describes alternatives considered relevant to MOD6.

### 2.1 Galong

#### 2.1.1 DA 317-7-2003-i

DA 317-7-2003-i was granted under the EP&A Act on 11 December 2003 by the (now) DPHI for the construction and operation of a limestone kiln to produce 150,000 tpa of quicklime at Galong.

Condition 1.2(b) of DA 317-7-2003-i states that development shall be carried out in accordance with the Environmental Impact Statement (EIS) titled 'Environmental Impact Statement Galong Lime Kiln Project' (Olsen Environmental Consulting, 2003).

**Section 2.4** of the EIS describes the existing site operations and **Section 4** describes the approved Project. **Section 4** contains the following information relating to the existing coal stockpile and associated transport process:

- "It is proposed that the Kiln will be coal-fired. Coal will be delivered by truck and stored in a fully enclosed, 200 t capacity building. Once or twice each day, coal will be reclaimed by front end loader and delivered by an elevator to a 50 t capacity surge bin. Coal will be fed from the surge bin to the mill by a short conveyor. The kiln will consume between 60 and 70 tonnes per day of coal."
- "It is proposed that one of the existing agricultural limestone grinding mills will be converted to a Coal Mill. The milling system will incorporate a bag filter and fan to maintain it under suction and to collect coal fines."
- "Pulverised coal will be pneumatically conveyed from the coal milling system to the coal dust storage. The pulverized coal is then metered carefully and transported pneumatically to a total of 60 burner lances in the Kiln."
- "It is most likely that coal will be delivered from either the Illawarra or Lithgow region via Galong Road. From Lithgow, the route will be from the northwest side of Galong Road and will avoid the village of Galong. The coal route from Illawarra will probably involve vehicles passing through Galong."
- "The Kiln will use between 60-70t of coal per day. The coal will be delivered by truck, resulting in up to two (2) B Doubles or three (3) semi-trailer deliveries per day. These vehicles will arrive and depart the Mine via Burley Griffin Way through the town of Galong. Transportation hours will be the same as for the expanded mine which is 7am to 7pm Monday to Saturday."
- "Vehicle access to the proposed Lime Kiln will be via the Mine's access road which is located in Eubindal Road at the end of the formed section of that road."
- "All product and delivery vehicles associated with the Kiln will use the route from Burley Griffin Way (MR84) via the town of Galong. This route includes Galong Road (Crescent Street, Bobbara Road, Ryan Street through Galong town) and Eubindal Road. These vehicles will arrive from and depart to the east along Burley Griffin Way (MR84)."
- "The operating workforce for the Lime Kiln will consist of an average of 4 people per day working over three shifts during a 24 hour day".

#### 2.1.2 DA 317-7-2003-i MOD1

MOD1 related to Sunday construction work hours.

#### 2.1.3 DA 317-7-2003-i MOD2

MOD2 increased LPG storage capacity.

#### 2.1.4 DA 317-7-2003-i MOD3

MOD3 was required to align with the requirements of the NSW Environmental Protection Agency.

#### 2.1.5 DA 317-7-2003-i MOD4

MOD4 permitted a temporary 10,000 t coal stockpile and increase truck movements (ERM, 2022).

#### 2.1.6 DA 317-7-2003-i MOD5

MOD5 is on exhibition until the 19/06/2024 and relates to the disposal of lime kiln wastes generated by the site operations within the overburden areas of the Galong Limestone Mine (Pitt & Sherry, 2024).

#### 2.1.7 Other Approvals

The following additional development consents have been issued for Galong Limestone Mine & Kiln:

- DA T2003-025 (as modified) from Hilltops Council provides approval for a limestone mine and processing and provides approval to alter the existing area of mining operations to 16 December 2043. DA T2003-025 approves the expansion of the mine and increased production for a period of 40 years with production of up to 500,000 tpa of limestone. DA T2003-025 has been modified on five occasions with the latest modification being approved on 27 September 2022
- DA 07-033 provides approval for the construction of an alternative transport route around Galong and to increase the annual rate of limestone extraction and transportation of product to 665,000 tpa
- DA 2020-0208 was approved on 27 April 2021 for construction and operation of a solar energy system with a 1 megawatt capacity
- DA 2020-0033 was approved on 23 April 2020 for a two-lot subdivision.

No changes to these development consents are required for MOD6.

## 2.2 Key Features

### 2.2.1 Local and Regional Community

Galong Limestone Mine & Kiln is located in Galong, 22 kilometres (km) east of Harden and 20km south of Boorowa; and is 93 km north-west of Canberra.

### 2.2.2 Surrounding Land Uses

Galong Limestone Mine & Kiln is surrounded by land zoned RU1 Primary Production under Hilltops Local Environmental Plan 2023 (Hilltops LEP). The surrounding land is used for sheep and cattle grazing and/or cropping.

### 2.2.3 Natural Features

Galong Limestone Mine & Kiln is in the north-eastern part of the Murrumbidgee River Basin in an area of undulating to hilly topography where relief varies from 450 m AHD to 750 m Australian Height Datum (AHD) and is in the upper part of Limestone Creek catchment in a broad open valley that faces northwest. The natural topography has been altered by development of the limestone mine and kiln. Extensive land clearing for agricultural land use has occurred in the surrounding area.

Galong Limestone Mine & Kiln will be developed in the catchment of Limestone Creek. This is an ephemeral tributary of Rocky Ponds Creek which enters Jugiong Creek. Jugiong Creek eventually enters the Murrumbidgee River 300 km south-west of Galong Limestone Mine and Kiln as generally described in. Limestone Creek has a catchment of 38 km<sup>2</sup> of which approximately 7.6 km<sup>2</sup> is located upstream.

The natural drainage has been altered by the development of the Galong Limestone Mine and Kiln, in addition to that caused by extensive land clearing and agricultural land use in the surrounding area.

#### 2.2.4 Built Features

The Galong Limestone Mine and Kiln generally contains the following buildings and machinery

- Limestone mine: crushing circuit, limestone mill building, product storage hoppers and tanks, weighbridge, five transportable office and storage buildings, banded LPG and fuel tanks and an equipment laydown area; and
- Lime kiln: including kiln, coal mill, coal storage shed and a lime silo.

#### 2.2.5 Land Ownership

The land the subject of MOD6 is entirely within land owned by Graymont.

The nearest private receivers to Galong Limestone Mine and Kiln are illustrated in **Figure 2.**

### 2.3 Cumulative Impacts

The Galong Limestone Mine and Kiln is the only major project operating in Galong (DPHI, 2024) with MOD6 expected to have negligible cumulative impacts as discussed in **Section 6.**

### 2.4 Government Strategies, Policies and Plans

DA 317-7-2003-i was granted under the 'Harden Interim Development Order Number 1', with the concurrence of the Director-General of the Department of Infrastructure, Planning and Natural Resources (constituted under the EP&A Act). 'Harden Interim Development Order Number 1' was superseded by the Harden LEP 2011.

The following government plans and strategies are also relevant to MOD6.

#### 2.4.1 South East and Tablelands Regional Plan 2036

Galong Limestone Mine and Kiln is within the south-east and Tablelands Region. The 'South East and Tablelands Regional Plan 2036' (DPE, 2017) outlines the State Government's land use planning priorities for the South East and Tablelands Region.

The plan defines four broad goals, each comprised of more specific directions. Goal 1 is for a connected and prosperous community. MOD6 is consistent with Goal 1 of the plan as it continues the prosperity of Galong and the flow-on effects to the community.

The other goals are not relevant to MOD6.

#### 2.4.2 Hilltops 2040

Hilltops 2040 is the name of the 'Hilltops Local Strategic Planning Statement 2020-2040' (LSPS) (Hilltops Council 2020). The plan has five strategic policies, each comprised of more specific objectives. Strategic policy three is "Economic Development" which contains the following objective:

*"5. Intensive agricultural and mining activities are supported subject to the full consideration of topography, soil types, and environmental impact."*

MOD6 aligns with this objective as it related to continued mining activities and this Modification Report considers environmental impact.

### 2.5 Regional and Local Planning Context

**Section 4** discusses the regional and local planning context.

### 2.6 Environmental Constraints

Environmental constraints and appropriate mitigation measures are described in detail in **Section 6.**



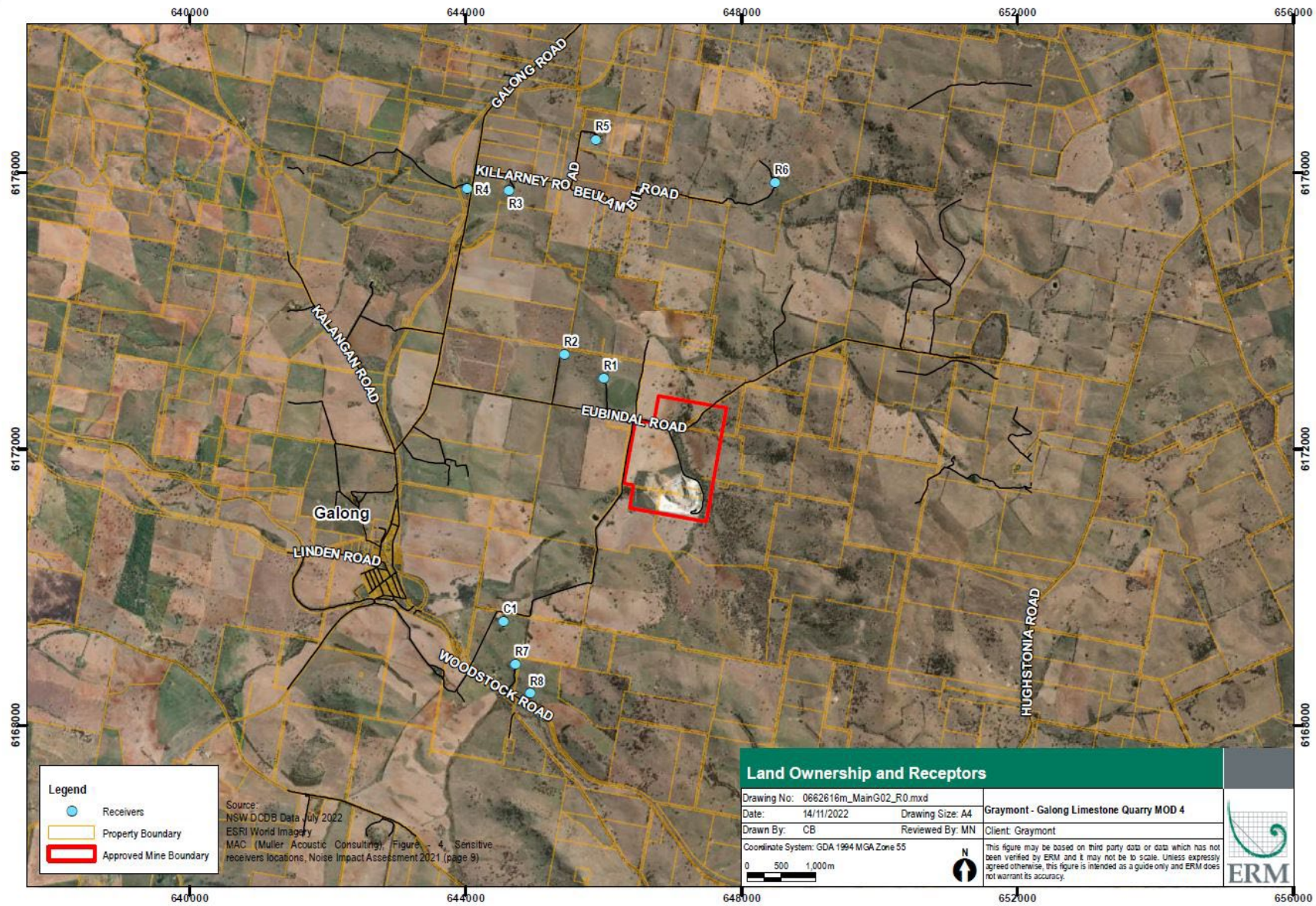


Figure 2. DCDB boundaries and Receptors (ERM 2022)

### 3 DESCRIPTION OF MODIFICATION

This section describes the operational activities for which the modification is sought, as well as the alternatives considered.

#### 3.1 Description

Graymont is seeking to remove a redundant consent condition 3.25A.

Graymont is also seeking to address a pending inconsistency in the MOD report documents listed in consent condition 1.2 (ERM 2022<sup>1</sup>), regarding the period over which the Stockpile is permitted to remain under MOD4. Graymont seeks to modify the date by which the Stockpile will be depleted to 30 June 2026.

Table 2 provides a summary of the proposed Modifications.

**Table 2. Summary of Modifications**

Element	Original Project	Modified Project
Temporary 10,000 t Coal Stockpile end date	30 June 2024 Described in the MOD4 modification report (not in consent conditions)	30 June 2026
Vehicle Movements	Up to 12 heavy vehicle movements per day (six in and six out) permitted under MOD4	Up to six heavy vehicle movements per day (three in and three out) (revert to conditions 3.25 as prior to MOD4)

#### 3.2 MOD6 Conditions Requiring Amendment

Graymont is seeking to remove a redundant consent condition 3.25A relating to the temporary increase in permitted heavy vehicle movements.

No other amendments are sought.

#### 3.3 Alternatives Considered

The stockpile already exists. The ‘do nothing’ option (i.e., continue to use coal to achieve the original deadline for depletion) was not appropriate as it is operationally impractical to increase the throughput of coal in the kiln. Removal of the remaining stockpiled from the site by the original deadline coal would require an increase in truck movements to and from site (beyond that permitted in the Consent), would unnecessarily increase dust emissions and be of commercial detriment to Graymont.

The only reasonable solution is to seek a longer timeframe than previously estimated for the depletion of the stockpiled coal.

#### 3.4 Substantially the Same Development

MOD6 is “substantially the same development” as that approved under DA 317-7-2003-i MOD4 (or as sought under the current modification application MOD5) as no changes are proposed to the :

- size of the existing enclosed 200 t coal stockpile building or any other approved project element
- maximum capacity of the Stockpile (up to 10,000 t)
- existing storage area (100 m x 65 m)
- maximum height of the stockpile (2.5 m)
- approved operating workforce (up to four people per day)
- operation hours (the same as kiln operating hours, which are 24 hour per day, 7 days per week)
- lime kiln coal consumption rate (less than 70 t of coal per day)
- Duration of the limestone mine and kiln operation.

<sup>1</sup> As well as the subsequent ERM (2023).



#### 4 STATUTORY CONTEXT

This section outlines the key statutory requirements for Galong Limestone Mine and Kiln under the EP&A Act and other relevant NSW and Commonwealth legislation. It describes the power to grant approval, permissibility, the any post approvals required under other relevant acts.

The statutory framework including relevant legislative requirements is outlined in **Table 3**.

**Table 3. Statutory Framework**

Reference	Discussion
<b>Consideration under the EP&amp;A Act -Mandatory</b>	
Section 1.3 - Objects of the Act	<p>The relevant planning legislation in New South Wales is the EP&amp;A Act. Pursuant to Section 1.3, the Objects of the Act are:</p> <ol style="list-style-type: none"> <li>a. <i>to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State’s natural and other resources,</i></li> <li>b. <i>To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment</i></li> <li>c. <i>To promote the orderly and economic use and development of land</i></li> <li>d. <i>To promote the delivery and maintenance of affordable housing</i></li> <li>e. <i>To protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats</i></li> <li>f. <i>To promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)</i></li> <li>g. <i>To promote good design and amenity of the built environment</i></li> <li>h. <i>To promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants</i></li> <li>i. <i>To promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,</i></li> <li>j. <i>To provide increased opportunity for community participation in environmental planning and assessment.”</i></li> </ol> <p>Objects a, b, c and e are potentially relevant to MOD6. As demonstrated in this Modification report, MOD6 will promote the continued development of natural resources, and is proposed in an area approved to be disturbed and therefore includes environmental consideration and conservation of threatened species.</p>
Section 4.15 - Evaluation	<p>Pursuant to Section 4.15, the consent authority is required to take the following matters into consideration in determining a development application:</p> <ul style="list-style-type: none"> <li>● Relevant environmental planning instruments including: <ul style="list-style-type: none"> <li>- Harden LEP 2011</li> <li>- State Environmental Planning Policy (Resilience and Hazards) 2021</li> </ul> </li> <li>● Any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority, including: <ul style="list-style-type: none"> <li>- Hilltops LEP 2023</li> </ul> </li> <li>● Relevant development control plans</li> <li>● The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality</li> <li>● The suitability of the site for the development</li> <li>● Any submissions made in accordance with this Act or the regulations</li> <li>● The public interest.</li> </ul> <p>There is no Development Control Plan for the former Harden Shire Council area and therefore no relevant Development Control Plan for MOD6. Mitigation measures to reduce hazards are detailed in <b>Section 6.3</b>.</p>

Reference	Discussion
<b>Considerations under the NSW legislation (Section 4.42) – Cannot be refused</b>	
<i>Fisheries Management Act 1994</i> (FM Act)	MOD6 will not require an aquaculture permit under Section 144 of the FM Act.
<i>Coal Mine Subsidence Compensation Act 2017</i> (CMS Act)	MOD6 is not within a mine subsidence district. Therefore, it will not require approval under Part 3 of the CMS Act.
<i>Mining Act 1992</i>	The Mining Act 1992 aims to encourage and facilitate the discovery and development of mineral resources in NSW, having regard to the need to encourage ecologically sustainable development (ESD).  Mining Leases 1496 & 1745 will continue to apply to MOD6.
<i>Petroleum (Onshore) Act 1991</i>	The Petroleum (Onshore) Act 1991 aims to encourage and facilitate the discovery and development of petroleum resources in NSW, having regard to the need to encourage ESD.  There are no existing petroleum or coal leases or exploration licences to the Project Site.
<i>Protection of the Environment Operations Act 1997</i> (POEO Act)	Under the provisions of Schedule 1, Clause 6 of the POEO Act, lime production of more than 150 tonnes per day or 30,000 tonnes per year is classified as a Scheduled activity and requires an Environment Protection Licence (EPL). EPL4660 licences the Project Site to produce 100,000-250,000 t of limestone or cement per year.  No changes to EPL4660 are required due to MOD6.
<i>Roads Act 1993</i>	Consent from the appropriate roads' authority under Section 138 of the <i>Roads Act</i> is required for any works undertaken on or under public roads.  No work is proposed on or under a public road.
<i>Pipelines Act 1967</i>	The <i>Pipeline Act 1967</i> controls pipeline construction, operation, and licensing in NSW.  MOD6 will not involve the construction and operation of water pipelines. Licensing under this Act will not be required.
<b>Considerations under NSW legislation (Section 4.41) – are not required</b>	
<i>Fisheries Management Act 1994</i>	The Project will not require a permit under section 201, 205 or 219 of the FM Act.
<i>Heritage Act 1977</i>	The Project will not require approval under Part 4, or an excavation permit under section 139 of the <i>Heritage Act 1977</i> .
<i>National Parks and Wildlife Act 1979</i> (NPW Act)	The Project will not require an Aboriginal heritage impact permit under section 90 of the NPW Act.
<i>Rural Fires Act 1997</i> (RF Act)	The RF Act aims to prevent, mitigate and suppress bush and other fires in local government areas of the NSW. Section 63(2) of the RF Act requires the owners of land to prevent the ignition and spread of bushfires on their land.  The Project will not require a bush fire safety authority under section 100B of the <i>Rural Fires Act 1997</i> .
<i>Water Management Act 2000</i>	The Project will not require a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the <i>Water Management Act 2000</i> .

Reference	Discussion
<b>Considerations under other NSW legislation</b>	
<i>Biodiversity Conservation Act 2016</i> (BC Act) – Section 7.14	<p>The BC Act establishes mechanisms for:</p> <ul style="list-style-type: none"> <li>• The management and protection of listed threatened species of native flora and fauna (excluding fish and marine vegetation) and TECs</li> <li>• The listing of threatened species, TECs and key threatening processes</li> <li>• The development and implementation of recovery and threat abatement plans</li> <li>• The declaration of critical habitat</li> <li>• The consideration and assessment of threatened species impacts in development assessment process</li> <li>• Biodiversity Offsets Scheme, including the Biodiversity Values Map and method to identify serious and irreversible impacts.</li> </ul> <p>The MOD6 area is approved to be disturbed under DA T2003/025 (as modified). No additional disturbance will occur as a result of MOD6 and an assessment under the BC Act is not required.</p>
<b>Consideration under Federal Legislation</b>	
<i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act)	<p>The EPBC Act focuses on a Project’s impact on Matters of National Environmental Significance (MNES).</p> <p>If the Project has a potential to impact any MNES, an EPBC self-assessment should be undertaken. Based on the self-assessment, a decision can be made if an EPBC should be referred or not.</p> <p>If a Referral is lodged, the Federal Minister for the Environment DCCEEW will make one of three decisions:</p> <ul style="list-style-type: none"> <li>• The matter is considered a “Controlled Action”</li> <li>• The matter is not considered a “Controlled Action” if undertaken in a particular manner</li> <li>• The matter is not considered a “Controlled Action”</li> </ul> <p>If the matter is considered a Controlled Action, a decision will be made on what level of information is required. This will require either additional information, or a decision can be made on the Referral information provided.</p> <p>The MOD6 area is approved to be disturbed under DA T2003/025 (as modified). No additional disturbance will occur as a result of MOD6 and an assessment under the EPBC Act is not required.</p>
<b>Consideration under relevant EPIs (Permissibility)</b>	
<i>Hilltops LEP 2023</i>	The Project Site is zoned RU1 Primary Production under the Harden LEP 2011 and “mining” is permitted with consent.
<b>Considerations under Development Control Plans</b>	
	No Development Control Plan applies to the Project Site.

## 5 STAKEHOLDER ENGAGEMENT

Engagement with the Community Liaison Committee is currently underway for MOD6. The Galong Site Manager sent an email to the Galong Community Liaison Committee on 12 June 2024 advising the Committee of Graymont's intention to seek an extension of time for permission to use the existing storage coal pad for coal storage. The Committee was advised that this would not require further disturbance of ground or construction activity.

## 6 IMPACT ASSESSMENT

This Modification Report details the likely impacts of the Project upon the natural and built environments and the locality. The potential impacts and mitigation measures are summarised within this section.

### 6.1 Air Quality

#### 6.1.1 Background

The 2003 lime kiln EIS included an Air Quality Impact Assessment (Holmes Air Sciences, 2003). Dust emissions (total suspended particulates (TSP)) were estimated based on the proposed activities for the quarry operations. The assessment assumed that 500,000 tpa of material was mined and 200,000 tpa of material was milled (with the remaining 300,000 tpa being processed in the lime kiln). The emissions inventory estimated total TSP emissions of 211,040 kg per year.

#### 6.1.2 Impact Assessment

An Air Quality Letter Report (AQLR) was prepared to support MOD4 (ERM 2022, 2023) and concluded that the particulate matter emissions that will be generated by the Project would not be materially significant compared to the estimated emissions from previously approved activities at the limestone kiln. As MOD 6 only requires an extension to the storage period for the Stockpile permitted under MOD4, it is expected that there will be no material change to the particular matter emissions identified in the AQLR submitted with the MOD4 modification report. Therefore, the current Environmental Management Plan will adequately manage the potential emissions from the existing stockpile for the extended period sought through MOD6.

The AQLR findings have been updated with the particular matter emissions monitoring results obtained since that time. As per the Graymont Environmental Management Plan (Graymont, 2022), dust deposition monitoring is undertaken at the Galong Mine site at four locations and commenced in June 2010. The four locations are shown in **Figure 3**. A summary of dust deposition monitoring results from 2017 to 2023 is presented in **Table 4** and **Figure 4**.

The results show that in general, since 2017, there has been an overall decline in dust deposition recorded at DG1 and DG2. At DG3 and DG4, dust deposition results remained similar since 2017 with the exception of notably low results in 2022. The results show that dust deposition rates recorded since MOD4 was approved have not materially increased from those prior to 2022 and at some locations have continued to decrease. The proposed extension of permitted period for the Stockpile under MOD6 is not expected to affect this trend.

The NSW EPA maximum total dust deposition criterion is 4 g/m<sup>2</sup>/month, assessed as insoluble solids as defined by AS 3580.10.1. Only dust deposition at DG 1 has exceeded the NSW EPA criteria (during 2018 and 2019). No exceedances the NSW EPA criteria have occurred at any site since MOD4 was approved. Continued compliance with the NSW EPA criteria is expected as a result of the proposed changes under MOD6.





Figure 3. Location of dust deposition gauges (ERM 2022)

Table 4. Dust Deposition Monitoring Results Annual Average

Sample Point and Sample ID	Year	Total Insoluble Matter (g/m <sup>2</sup> /month)
DG 1 – Top of Bund	2017	3.76
	2018	4.99
	2019	4.70
	2020	2.81
	2021	1.86
	2022	0.79
	2023	1.77
DG 2 – Next to House	2017	2.90
	2018	3.08
	2019	2.85
	2020	3.15
	2021	2.30
	2022	1.80
	2023	1.75

Sample Point and Sample ID	Year	Total Insoluble Matter (g/m <sup>2</sup> /month)
DG 3 – Along Road	2017	2.51
	2018	3.09
	2019	3.20
	2020	2.91
	2021	2.40
	2022	1.92
	2023	2.90
DG 4 - Galong	2017	3.51
	2018	3.47
	2019	2.95
	2020	2.83
	2021	3.60
	2022	1.18
	2023	3.28

Note: **Bold** represents an exceedance of the criteria

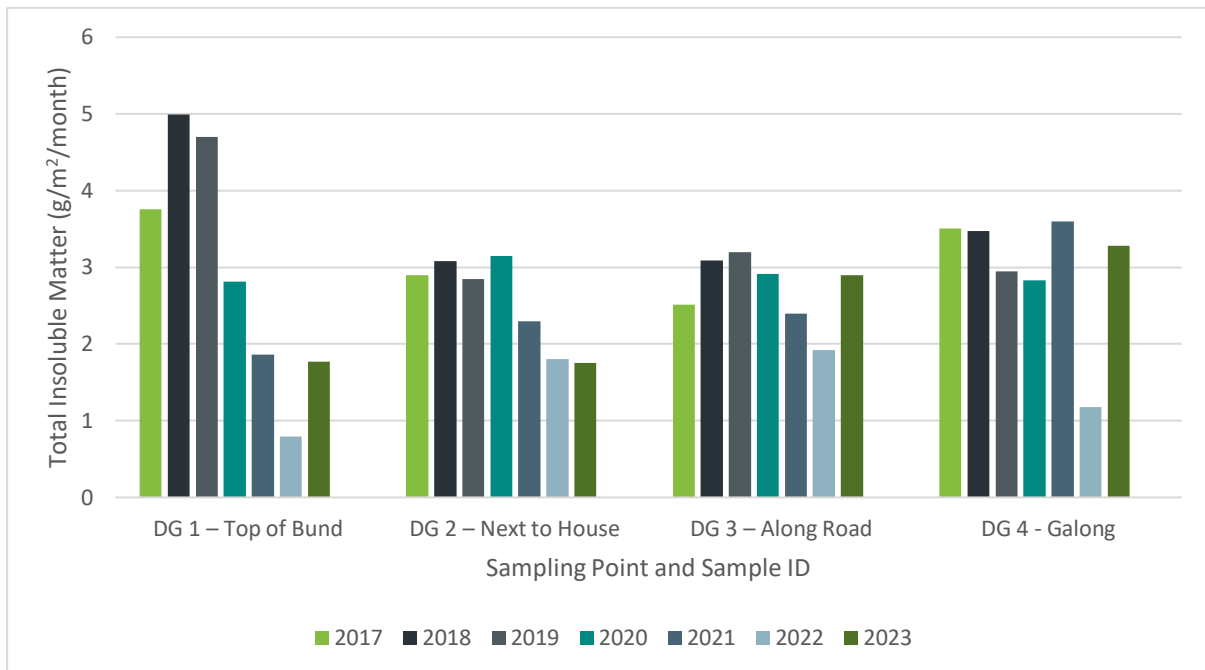


Figure 4. Dust deposition monitoring results

### 6.1.3 Mitigation and Management

No material impacts are expected and no additional mitigation and/or management measures are required beyond the existing measures in place for the limestone mine and kiln.

## 6.2 Other Environmental Factors

Other potential environmental factors have been considered in **Table 5**.

**Table 5. Other Environmental Factors Impact Assessment**

Environmental Factor	Impact Assessment
Noise	No increase in truck movements and no changes to operational conditions are associated with the extended timeframe of the Stockpile. Therefore, no further noise impacts expected.
Hazard – Coal Stockpile	The coal stockpile was designed by a suitably qualified professional, Kon Van Kessel – Senior Mining Engineer Graymont as described in the MOD4 report (ERM 2022). The nature, management and operation of the stockpile will not change as a result of MOD6.
Heritage and Biodiversity	The MOD6 area is approved to be disturbed under DA T2003/025 (as modified). No further consideration of heritage or biodiversity to that assessed for DA T2003/025; is therefore required for MOD6.
Visual	<p>The coal stockpile exists under current approvals., especially if the colour treatment guidelines and landscaping recommendations are implemented.</p> <p>The coal stockpile maximum height of 2.5 m will not be exceeded as a result of the changes sought under MOD6. There will be no impact on visual or aesthetic values beyond the increased period of the presence of the stockpile.</p> <p>The closest sensitive receiver to the boundary of the Project Site is 753 m as shown on <b>Figure 2</b>. The 2003 lime kiln EIS contained an Aesthetics Report (Maurice Hayter &amp; Associates Architects, 2003) that concluded because of its valley location, remote from public viewing, the proposal will have little visual or aesthetic impact on the surrounding countryside.</p>
Social and Economic	The Project would not result in a change to the workforce at the Project Site. The Project is not expected to cause any negative socio-economic impacts.
Rehabilitation	The MOD6 area will be considered with the larger rehabilitation of the Galong limestone mine in accordance with the 2022 Rehabilitation Management Plan (RMP) (and/or subsequent versions). The Project is not expected to cause any negative impacts in relation to rehabilitation.

## 6.3 Mitigation Measures Summary

The majority of impacts associated with proposed activities associated with MOD 6 (as described at **Section 3**) will be managed in accordance with existing Operational Environmental Management Plan(Graymont, 2022) in place at Galong Limestone Kiln and Mine. No additional measures or changes to the Plan are required.

## 7 JUSTIFICATION AND CONCLUSION

Graymont is seeking MOD6 to DA 317-7-2003-i under Section 4.55 (1A) of the EP&A Act to extend the duration of the temporary 10,000 t coal stockpile.

The Project is considered to be “substantially the same development” as that originally approved under DA 317-7-2003-i MOD4 as it does not involve changes to the:

- size of the existing enclosed 200 t coal stockpile building or any other approved project element
- maximum capacity of the Stockpile (up to 10,000 t)
- existing storage area (100 m x 65 m)
- maximum height of the stockpile (2.5 m)
- approved operating workforce (up to four people per day)
- operation hours (the same as kiln operating hours, which are 24 hour per day, 7 days per week)
- lime kiln coal consumption rate (less than 70 t of coal per day)
- Duration of the limestone mine and kiln operation.

Increased heavy vehicle movements permitted under MOD4 (up to 12 per day) are no longer required and have been reduced back to the level previously permitted (six per day).

Justification is provided for MOD6 as it will allow Graymont to continue to deplete the temporary coal stockpile with no material changes to environmental impacts expected.

Implementation of mitigation and management measures in accordance with the MOD4 Modification Report (ERM, 2022) and the Operational Environmental Management Plan (Graymont, 2022), will mitigate any residual environmental risks and impacts associated with the MOD6.

## 8 REFERENCES

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## 9 ACRONYMS

DA	Development Application
DPE	Department of Planning and Environment
DPHI	Department of Planning, Housing and Infrastructure (Formerly DPE)
EIS	Environmental Impact Assessment
EPA	Environmental Protection Agency
ESD	Ecologically Sustainable Development
EP&A Act	Environmental Planning and Assessment Act
km	Kilometres
LEP	Local Environmental Plan
LSPS	Local Strategic Planning Statement
m	Metres
MOD	Modification
NSW	New South Wales
t	Tonne
tpa	Tonnes per annum

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