

16 March 2017

Ms Lauren Evans  
Planning Officer  
Resource Assessments – Planning Services  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Evans

### **Hunter Valley Operations South - Modification 5 (MP 06\_0261)**

I refer to your email of 8 February 2017 inviting comment on the Environmental Assessment (EA) exhibited on the NSW Department of Planning & Infrastructure web site in relation to the Hunter Valley Operations South - Modification 5 (MP 06\_0261) (the Project).

The Hunter Valley Operations South mine is located 24km north-west of Singleton. The Project involves modification to the current approval in order to mine to deeper coal seams, increase the height of overburden emplacement, increase extraction and processing rates from 16 million tonnes per annum (Mtpa) to 20 Mtpa run-of-mine (ROM) coal, and update of Statement of Commitments within PA 06\_0261. There will be no change to the approved footprint of disturbance.

Hunter New England Population Health (HNE Health) has reviewed the EA report paying particular attention to the management of air quality, noise, groundwater, surface water and other issues which may have an impact on public health. The following points are discussed and should be considered in the approval process for this project.

#### **Air Quality**

There is no evidence of a threshold below which exposure to particulate matter (PM) is not associated with health effects. Therefore, it is important that all reasonable and feasible measures are taken to minimise human exposure to PM, even where assessment criteria are met.

We note the document entitled *HVO South Modification 5 – Update of the Approved Methods* that updates the air quality impact assessment because the initial assessment had not adopted the variation to the National Environmental Protection (Ambient Air Quality) Measure (NEPM) air standard incorporated into the EPA Approved Methods. The updated assessment estimates annual average PM<sub>10</sub> impacts on communities adjacent to the mine and identifies multiple residences where the NEPM air standard for PM<sub>10</sub> will not be met.

While the update made an adjustment to recognise the variation to the PM<sub>10</sub> standard, the air quality assessment has not been updated for the variation to the annual average PM<sub>2.5</sub> air standard of 7µg/m<sup>3</sup> by 2025. This project will extend beyond 2025 and this standard may be

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breached in adjacent communities. The project timelines for completion of Stage 2 and Stage 3 are described as “indicative” and “flexible”, so it would be appropriate to add an isopleth for a  $PM_{2.5}$  level of  $7\mu g/m^3$  to Figures 1 (Stage 2) and 2 (Stage 3).

### **Noise and Blasting**

Environmental noise can have negative impacts on human health and well-being and trigger ongoing community complaints about annoyance, sleep disturbance and stress. Evidence concerning the adverse health effects of environmental noise is detailed in a number of publications, for example, the *World Health Organization Night Noise Guidelines for Europe* (2009) and the *WHO Guidelines for Community Noise* (1999). To protect public health, it is prudent to take all reasonable and feasible measures to minimise public exposure to mine-related noise, irrespective of compliance with the relevant noise policies.

Under the *NSW Industrial Noise Policy* (EPA 2000), a development is considered to cause a noise impact if the predicted noise level at the receiver exceeds the project specific noise levels (PSNL) for the project. This Policy also details the response and mitigation measures required when noise trigger levels are met or exceeded.

The noise modelling in the EA shows the potential for some significant exceedances during prevailing weather conditions (Table C.1 in *Appendix E Noise and Vibration Study*). As shown in Table C.1, the Project is predicted to exceed the PSNL at a large number of private residences, including one residence with exceedances greater than 5 dB(A) (Noise Affection Zone), 25 residences with exceedances of 3-5 dB(A) (Active Noise Management Zone), and 4 residences with exceedances of 0-2 dB(A) (Noise Management Zone).

The EA states that the proponent has contacted and sought feedback from all residents that have been identified, via the modelling, to be impacted by the Project. In the event that the Project is approved, it is advised that the proponent engage in clear and open consultation with these residents to ensure they are aware of the extent of the impacts and their options.

The current approval allows for a maximum of three blasts a day, and 15 blasts per week, between the hours of 7am and 6pm Monday to Saturday, with no blasting allowed on Sundays, public holidays, or any other time without written approval from the EPA. We emphasise the need to ensure strict control of blast conditions to protect the public from the impacts of vibration, overpressure and blast fume emissions.

If you require any further information please telephone Carolyn Herlihy, Environmental Health Officer on 4924 6477.

Yours Sincerely



Professor David Durrheim  
**Director – Health Protection**  
**Hunter New England Population Health**