

Industry Assessments
Attention Sally Munk
Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street,
Parramatta NSW 2150

Dear Sally,

**Major Projects – Advice on EIS - Woodlawn Advanced Energy Recovery Centre State Significant Development (SSD) application (SSD-21184278)
Feedback from Murrumbidgee and Southern NSW Local Health District Public Health Unit**

Thank you for the opportunity to provide advice on the EIS for the proposed Woodlawn Advanced Energy Recovery Centre State Significant Development (SSD) application (SSD-21184278).

The Public Health Unit has relied on expert reports provided by the NSW Department of Planning and Environment (DPE) in preparing this submission, being the Independent Merit Assessment - Human Health Risk Assessment prepared by CDM Smith and partially funded by NSW Health, dated 14 December 2022. In this regard, the Public Health Unit endorses the comprehensive list of further requirements for the HHRA to allow further merit review of the HHRA as outlined in Section 3 Part 6 of this report.

In addition, the Public Health Unit has reviewed the EIS chapter on health risk and the Human Health Risk Assessment report provided by the applicant and makes the following comments.

Technical detail

- A continual improvement commitment should be implemented over the life of the plant (25 – 30 years) to ensure that air monitoring/treatment technology upgrades are installed when available.

Air quality and odour

- The report identifies that surrounding ambient air quality background levels of PM_{2.5}, SO₂, and NO_x, are already at or exceed National Environment Protection (Ambient Air Quality) Measure guideline values. Therefore, it is important that this project contributes negligible and acceptable values of incremental concentration increases of emissions. (Although assessed incremental increase in particulates are low, any increase has the potential to cause increased health impacts and therefore it is important to use the best available emission control technology to minimise emissions).
- The emissions data does not clearly identify the risk calculations for PM₁₀ and therefore does not translate into verification of alleged negligible impacts associated from dust deposition.

Waste Classification/management

- It is not clear that the EIS has addressed the on-site waste management of residual biproducts generated by the AERC, and therefore, alleged negligible impacts from this storage cannot be verified.
- PFAS Not quantifiable in emissions testing, so not quantified in the HHRA. The HHRA does acknowledge that PFAS could be a source from municipal waste and that risks were likely to be low. However, with continual advancement in PFAS technology this may be a quantifiable pathway in future for emissions and should be noted in the HHRA report.

Human Health Risk Assessment

- It is not clear whether dust deposition from contaminants attached to PM10 have been considered in the calculation of impacts associated with the assessment of drinking water. The verification and quantification of such may alter predicted negligible impact on humans via inhalation and ingestion, particularly in sources of rainwater, plant uptake and consumption of animals.
- The HHRA should include background soil concentrations for each relevant contaminate of concern to adequately verify risks associated with cumulative risk and potential contamination of surface and groundwaters

Conclusion

While the methods applied in the HHRA report and risk outcomes generally address the requirements outlined in the SEARs for the proposed AERC, verification of the accuracy of the risk characterisation and conclusions made in the EIS cannot be completed due to inconsistencies noted above.

Additional information should be provided by the applicant which addresses noted concerns to enable the Murrumbidgee and Southern NSW Local Health District Public Health Unit to verify the conclusions in the EIS/HHRA, which indicate that there are no unacceptable short- or long-term health risks associated with the construction and operation of the AERC.

Should you wish to discuss this matter further, please contact Tabitha Holliday, Environmental Health Officer on 0407 060 237 or Tabitha.Holliday@health.nsw.gov.au.