

The Director
Policy Systems and Procedures, Development Assessment Systems and Approvals
NSW Department of Planning and Infrastructure
By email: plan_comment@planning.nsw.gov.au

30 September 2013

Dear Director,

Submission of Objection – Western Coal Services Project

The Nature Conservation Council of NSW (NCC) welcomes the opportunity to comment on Centennial Coal's Western Coal Services Project.

NCC is the peak environment body for New South Wales, representing more than 100 organisations. We have long-standing experience in state environmental assessment and planning and are extremely concerned with the proposed upgrade of existing handling and processing infrastructure at the Angus Place and Springvale coal mines.

This project put forward by Centennial Coal poses health and environmental risks to the local communities of Lithgow and its surrounding towns. Not only will there be higher levels of coal dust produced due to the increased movement of coal from the mines, there will be negative water quality and noise impacts.

NCC objects to the Western Coal Services Project on the following grounds:

Coal dust impacts

Coal dust in the form of particulate matter (PM₁₀ and PM_{2.5}) poses a significant health risk to the people living in proximity to the mines and coal transport routes. The health risks related to particulate matter include respiratory problems, cardiovascular issues, increase in the incidences of asthma and premature death. People who are at most risk from particulate matter exposure are children, teens and those over the age of 65¹.

The proposed increased output of the Springvale mine and the approved Angus Place Modification 1 Project will result in an increase in the coal dust along the Wallerawang and Mt Piper haul roads. As shown in Table 40, the comparison of scenarios 1a and 1b to scenario 2a and 2b shows a considerable increase in PM₁₀ levels².

¹ American Lung Association, 2013, *State of the Air 2013*, <http://www.stateoftheair.org/2013/assets/ala-sota-2013.pdf>, pp.33-34.

² NSW Dept of Planning and Infrastructure, 2012, *Springvale Mine Extension Project*, http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5594

The National standards for particulate matter levels, PM₁₀ and PM_{2.5} are 50 µg/m³ over a 24-hour period and 25 µg/m³ over a 24-hour period³. According to the Western Coal Services Project EIS, there could be gross exceedances of the National standards for PM₁₀ and PM_{2.5} at sites such as WR1 and WR2.

Impact on water quality

Based on the most recent Sydney Catchment Audit 2010, water quality in the Nuebeck's Creek sub-catchment of the upper Coxs River is considered the worst in the entire Sydney Catchment.

The water quality problems stem from the open-cut mining at the old Eastern & Western Main Collieries (the Proposed Area), and the adjacent old Wallerawang Colliery (now Pine Dale Mine). Bad extraction practices of poor-quality shale and claystone coal seams, which are high in sulphur and pyrites, led to the creation of a legacy of acid mine drainage, salinity and heavy metal problems.

The Western Coal Services Project EIS has identified concerns about contaminants from the processing centre, including iron, manganese, nickel, and zinc, entering the local watercourses. It also highlighted that there would be increased salinity levels and sediment deposits in the creeks and rivers that flow past the washery site.

The concerns raised in the EIS are similar to those of the Lithgow community, members of which have conducted their own monitoring and water quality checks in the waterways. They have found pH, salinity, and phosphate levels and water temperatures are much higher than background levels, and that dissolved oxygen levels have decreased over the same period⁴. The increased output from the washery at the Springvale Coal Service site could exacerbate these water quality issues putting further strain on the local water supply and the flora and fauna that rely on these waterways for their survival.

Impacts on the community

The village of Blackmans Flat is already affected by two open-cut mines, the 1500 MW Mt Piper Power Station and Centennial's coal washery and coal handling operations. Additional 24-hour-a-day, seven-day-a-week coal-handling operations within metres of the residents of Blackmans Flat is unacceptable.

This project could result in the quadrupling of heavy coal truck movements along the Coal Link Angus Place to Mt Piper Haul Road that would create noise and lighting issues for local residents. Blackmans Flat is in a valley, and the noise generated by mining and power generation operations bounces off surrounding hills and is projected south down the valley. Noise from bulldozer trucks working on the Mt Piper Coal Stockpile have resulted in complaints from residents 4km away. This noise is amplified by the localised phenomenon of temperature inversions, which are common during winter, late at night, and early mornings when sleep disruption is likely to occur.

³ Australian Government; Department of Sustainability, Environment, Water, Population and Communities, 2013, *National standards for criteria air pollutants in Australia*, <http://www.environment.gov.au/atmosphere/airquality/publications/standards.html>

⁴ Lithgow Environment Group, 2010, Stream Watch, <http://www.lithgowenvironment.org/stream-watch.html>.

Over the past 12 months the demand for electricity in NSW has decreased, and this led to two Wallerawang generators being shut down during January⁵. However, according to proposed changes, it is projected that out of the 7 Mtpa processed at the Springvale Coal Service site, 6 Mtpa will be exported. The threat posed by this project to the local communities far outweighs the benefits it brings to the local economic and employment sector.

Conclusion

Given the impacts on the air, water and the community, it is irresponsible to develop the Western Coal Services Project and we urge the NSW government to reject the proposal.

Yours sincerely,

Katherine Smolski
Campaigns Director

⁵ Pitt & Sherry. 2013. Carbon Emissions Index – Electricity Emissions Update – 30th April 2013, <http://www.pittsh.com.au/assets/files/Cedex/CEDEX%20Electricity%20Update%20May%202013.pdf>.