

Attention Paul Freeman

NSW Planning & Environment

320 Pitt Street

SYDNEY NSW 2000

SUBMISSION ON CLARENCE COAL (MOD 4) - DA504-00-Mod-4

Dear Sir/Madam,

Thank you for the opportunity to comment on Centennial Coal's application to modify conditions of consent for the Clarence Colliery to increase the total allowable coal haulage off-site by road to the Mount Piper Power Station by 100,000 tonnes until 31 December 2020. I oppose this current project.

I am very concerned about the impact of heavy diesel truck movements, mining and coal-fired power on air pollution and the health of residents in Lithgow and surrounding areas. Although the direct emissions from this proposal are relatively small, the proposal will increase air pollution and must be considered in the context of the cumulative emissions load in the region.

Air pollution is a serious issue in Lithgow and is harming people's health

In the Lithgow region there are several significant sources of fine particle pollution, including the Mt Piper power station and local mines, including Centennial's Springvale and Clarence collieries. According to data from the National Pollutant Inventory, in 2017-18 there were 395,700 kg of fine particles emitted from these three sources alone, including 61,000 kg of ultra-fine particles less than 2.5µm.

The NSW Environment Protection Authority has identified fine particle pollution as a priority due to the adverse impacts on health, particularly for the elderly, children and those with existing health conditions, such as heart or lung disease or asthma.

Air pollution is currently not adequately monitored in the Lithgow area

Unfortunately, it is not possible to accurately assess the impact all this accumulated air pollution is having on the health of residents in Lithgow and the surrounding region. This is because there is currently no National Association of Testing Authorities-accredited, continuous air-quality monitoring station in the Lithgow area as part of the NSW Government's statewide air-quality monitoring network. However, in comparable regions such as Muswellbrook and Singleton, near the Bayswater and Liddell coal-fired power stations, publicly available data shows these areas regularly breach national air-quality standards for fine particles.

Transportation of coal by road will add to the cumulative air pollution load

The proposed modification will result in an additional 30–56 daily movements of heavy diesel trucks through Lithgow. This is on top of the existing 50 truck movements per day associated with a similar modification granted in 2014 which has allowed 100,000 tonnes per year of coal haulage to the west. This will significantly add to the cumulative air pollution load through wheel-generated particulates on unsealed roads at either end of the journey and transferring and dumping coal into and out of trucks. The NSW EPA has also identified diesel exhaust emissions as a major source of fine particle pollution, as well as ozone-forming nitrogen-oxides and toxins.

Centennial should be required to ensure public air-pollution monitoring

Centennial Coal operates the Springvale and Clarence collieries, and supplies the coal for the Mt Piper power station, the largest emitter of fine-particle pollution in the region. Centennial has a responsibility to ensure health authorities and residents are better able to understand the cost to their health and wellbeing of air pollution and identify opportunities to mitigate the threat. This modification application is an opportunity to ensure Centennial Coal takes on this responsibility.

The monitoring stations should be publicly owned and operated as part of the NSW Government's statewide air-quality monitoring network. It is not good enough for the monitoring to be privately undertaken by the polluter. To ensure access, consistency and public confidence in the quality of the data being reported, Centennial Coal should be required to pay for the NSW Department of Planning and Environment to install, operate and maintain at least two permanent, NATA-accredited, continuous air-quality monitoring stations in the Lithgow area. These should monitor particles, sulphur dioxide, nitrogen oxides and ozone.

Best practice pollution reduction controls should be mandatory

The conditions of consent should require best-practice pollution reduction controls for the loading, transport and unloading of the coal, including:

1. Trucks transporting coal from the premises must be covered immediately after loading to prevent wind-blown emissions and spillage. The covering must be maintained until immediately before unloading the trucks.
2. The drop height when loading and unloading the trucks must be less than 1.5 metres.
3. The moisture content of the material transported must be at least 2%.
4. There must be a truck wheel wash before any truck used to haul coal leaves the mine or the destination to ensure that truck is clean and free of loose material.
5. All trucks used to haul coal from the site must be compliant with Euro VI standards for heavy vehicle emissions.

Additional Comments

1. Castlereagh Highway B55 is a tourist designated highway and if this project was to be determined it discourage visitors to our areas with the extra movements proposed. I object to the trucks being on this road corridor.
2. Lithgow is in transition and a major push by numerous dedicated community members including Lithgow City Council playing an integral part in diversification for Lithgows future. The current proposed [Destination Pagoda](#) tourist economic plan launch 8th April 2019 in Lithgow. planning directions. [Long-term plan for Portland Cement Works revealed](#). This project will not assist in those future plans.
3. Energy Australia – Mt Piper Power Station has an obligation in this proposal and has not sought to seek other resources, due to that lack of planning the community is again paying the price that will impact on our local roadways due to not forward planning. Coal could be sourced from the east via rail.
4. Mt Piper Power Station borders on Ben Bullen State Forest which is known to be a high biodiverse and geological draw card, which is visited by thousands of people every year, this is yet another deterrent to a vast sector of visitors not to visit this area. It will also reduce those existing visitors and potential new visitors to this area.
5. Surrounding areas to Mt Piper Power Station also includes villages and 2 other state forest as well as National Parks, again this project will hinder people wanting to drive, stay and visit with accommodation close to those areas.
6. Introducing more trucks in particular to the area of Blackmans Flat will impact severely with already known cumulative impacts with Mt Piper Power Station holding average of exposed coal stock piles of 300,000 tonnes, over 20 million tonnes of exposed fly ash and bordering Mt Piper Power Station is Centennial Western Coal Services which has the capacity to hold over 830,000 tonnes at any given time. The air borne particles and emissions from these sites is hardly inviting for anyone to want to stay let alone drive to the bordering natural areas.
7. Lithgow is in great need of support for direction, strategic planning, funding from all relevant government departments to assist with the supporting evidence from local people, local groups, local businesses, visitors and Lithgow City Council on wanting diversification to ensure this great city and villages continue to grow and thrive after coal. Lithgow has the potential to be a renewable energy transition town given the infrastructure already in place. Incentive to support the existing coal and energy workers and their children with the first step of local training transition to renewable jobs equally investment with clean green renewable energy projects. Renewable projects that will have no add emissions to an already known hot spot from those current and proposed coal and energy industries. Lithgow has the potential to be an international visiting location, it is a unique untapped economic sustainable resource waiting, if given the right economic support from governments

Thank you for your time in reading my submission and would like to be kept informed of this project.

Yours sincerely