

17 November 2013

Ms Rebecca Sommer  
Planning Officer  
NSW Department of Planning & Infrastructure  
G P O Box 39  
SYDNEY NSW 2001

[rebecca.sommer@planning.nsw.gov.au](mailto:rebecca.sommer@planning.nsw.gov.au)

Dear Ms Sommer

**PORT WARATAH COAL SERVICES LIMITED  
RESPONSE TO COMMUNITY SUBMISSIONS - TERMINAL 4 PROJECT**

I refer to the responses to submissions prepared by EMGA Mitchell McLennen exhibited by the NSW Planning & Infrastructure in relation to the Port Waratah Coal Services project proposal for the construction of the Terminal 4 (T4) Project on Kooragang Island next to existing coal loading infrastructure and on the opposite side of the Hunter River in Mayfield North.

The T4 Project proposes to modify its throughput to 70 Mtpa which is in addition to Port Waratah Coal Services approved current capacity of 145 Mtpa (120 Mtpa through Kooragang Coal Terminal and 25 Mtpa through Carrington Coal Terminal). The addition of the T4 Project is a significant increase in coal throughput through the port of Newcastle.

We acknowledge the proponents consideration of Hunter New England Health's submission to the Terminal 4 Coal Loader Project proposal.

**Air quality**

The health effects of exposure to PM<sub>2.5</sub> and PM<sub>10</sub> are well established. As the proponent's response to submissions acknowledges, no threshold has been identified below which exposure to PM is not associated with health effects. Compliance with air quality standards is not, therefore, completely protective of health. The lack of an identified threshold is recognised in the National Plan for Clean Air, a goal which is to develop an "exposure reduction framework" that will encourage reductions in population exposure to PM, even where standards are met.

Hunter New England Local Health District  
ABN 63 598 010 203

Hunter New England Population Health  
Locked Bag 10  
Wallsend NSW 2287  
Phone (02) 4924 6477 Fax (02) 4924 6490  
Email PHEnquiries@hnehealth.nsw.gov.au  
[www.hnehealth.nsw.gov.au/hnep](http://www.hnehealth.nsw.gov.au/hnep)

We note the sensitivity analysis using alternative years to the 2010 PM10 monitoring data – which was atypically lower than other years. The Air Quality Assessment for the Modified Project for 70 Mtpa operations, predict an incremental annual average PM10 concentration up to 0.7  $\mu\text{g}/\text{m}^3$  (Warabrook and Mayfield West) and 1.0  $\mu\text{g}/\text{m}^3$  (Sandgate) and an incremental maximum 24 hour average PM10 (in Stage 3 operations) of 5.4 and 6.8  $\mu\text{g}/\text{m}^3$  in Mayfield West and Sandgate respectively.

While the modelled air quality impacts comply with the current EPA assessment criteria, should the project be approved it is recommended that the proponent is required to implement all reasonable and feasible measures to control emissions of PM2.5 and PM10 from all sources. This will ensure that any health impact is minimised.

### **Coal Dust in Rail corridors**

Fugitive coal dust emissions from trains continue to be of concern to the community. While it is acknowledged that PWCS does not have operational control over coal trains, one of the main sources of community concern in regard to the coal loader development is the increased rail movements. While the estimates of particulate levels from modelling fugitive coal dust from trains are reassuring, it would be useful to fully assess community impacts of fugitive coal dust and diesel emission from trains using EPA approved monitoring methods.

### **Noise**

The noise generated by the increase in train movements due to the T4 proposal is still within the OEH guidelines. The management and monitoring measures for noise and vibration levels generated during construction and operation of the proposal are in line with those in the Environmental Assessment and appear appropriate for the modified proposal.

There will be occasional perceptible increases in noise beyond that produced by the current Kooragang Coal Terminal. Given there are community concerns about noise from the current terminal it will be important to implement all feasible and reasonable noise mitigation measures to minimise the cumulative noise impact.

Yours sincerely



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