

# Rathmines

PROGRESS ASSOCIATION



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*Postal Address:*

THE SECRETARY

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8th November 2014

REF: SSD 5145

Public Submission to Northern Coal Logistics Project

[www.majorprojects.planning.nsw.gov.au/page/on-exhibition](http://www.majorprojects.planning.nsw.gov.au/page/on-exhibition)

## **Who We Are**

The Rathmines Progress Association has been in existence since 1945. The Association covers the suburbs of Rathmines, Fishing Point, Balmoral and Buttaba.

## **What We Stand For**

To quote in part from our constitution:

“Aims & Objectives”

The Rathmines Progress Association and its members shall individually and collectively interest themselves in and work for the good of the community in general and provide and/or maintain Community Amenities.

## **Where we live**

We are situated on Western Lake Macquarie New South Wales; our nearest Town Centre is Toronto Postcode 2283. Rathmines, Fishing Point, Balmoral and Buttaba are all in postcode 2283

Postcode 2283 adequately describes the suburbs around Toronto with a total population of 22,729.



## **Rathmines Progress Association's Response to Northern Coal Logistics Project SSD 5145 Produced by SLR Consulting Australia Pty Ltd**

Centennial Coal should be congratulated on this Environmental Impact Statement. It is the most detailed Environmental Impact Statement publication we have witnessed to date. It is a testament to providing clear and concise vision to the future of their significant coal operations in Lake Macquarie.

### **Air quality in Our Areas**

It is noted in this EIS that the only EPA independent monitored sites are at Newcastle, Wallsend and Beresfield a distance of approx 17.5Km, 12.5Km and 22Km respectively from Newstan Mine. Our Association believes such distances from independent monitored EPA sites are too great to properly reflect our local areas.

Also it states on page 307 of this EIS "limited research has been undertaken to assess the fraction of PM10 from a wide range of sources which would be emitted as PM2.5 and as such, publicly available emission rates for PM2.5 are not available". Given the lack of reliable evidence they adopted an eight year old document, namely "Fugitive Dust Emission Factors MRI dated 2006" to calculate the emission rates for PM2.5

Again on page 307, Table 68, Ambient Air Quality Environment levels for existing Power Stations are summarised.

However, nothing is mentioned regarding fugitive emissions from uncovered coal wagons from the Wallerah 2 Coal Project transporting five million tons of coal per annum for 28 years or Centennial Coal transporting eight million tons of coal per annum for the next thirty years in uncovered wagons. Also the return trip of these empty uncovered wagons which emit fine coal particles of coal (venturi effect) to the atmosphere in our surrounding areas.

It is mentioned in this EIS that RailCorp, ARTC and HVCC are in control of timetabling coal transport. Indeed it is possible that other collieries may transfer their coal via Port Kembla if delay time to Port Newcastle became unacceptable. This would result in more uncovered coal wagons travelling through our area.



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## Uncovered Railway Coal Wagons

The Northern Coal logistics Project's Main Report Introduction states, Newstan Colliery began underground coal mining operations in 1887.

It would be expected that the experience and expertise gained by Newstan Mine Management, staff and its various owners in mining and transportation of coal for one hundred and twenty four years would make it a lead model in the mining industry.

It is interesting to evidence upon reading Volume 1 Main Report (438) of this EIS that the only reference to covered trucks is on page 316 under the heading of "Construction Management Plan"

It has been the practice for many years to cover all loaded coal trucks travelling the Private Haul Road from Newstan to Eraring Power Station and other Centennial Coal mines. There is no reference made to this in the EIS. It is also understood that New South Wales Regulations, require all trucks carrying loose particulate material on Roads must cover their loads.

However, there is a great anomaly in the law and working practice that railway coal wagons delivering coal into Eraring Power Station from the Main Northern Railway spur loop, do not have to cover their coal as an operating practice, unlike the road coal trucks and trailers on the private coal road.

Similarly is the case with Centennial Coal which cover coal trucks on the Private Haul Road then transports coal in uncovered wagons (up to 3,450 tonnes per train) through suburban communities.

This project applies for a combined total increase (from 4 million tonnes to 8 million tonnes per annum) for shipping from Newcastle or Port Kembla. All the rail trips will originate from the Newstan train loading loop, these additional movements double the risk of coal dust to the suburban communities of Lake Macquarie, Newcastle, Sydney Metropolitan Area and communities to the south to Port Kembla.

We now refer to "Centennial Newstan Air Quality Impact Assessment" prepared by Global Environmental Solutions (SLR), Report No. 630.10002, dated 12th September 2011.

(It is noticed the subject EIS has been prepared by the same Consultants.)

Page 60 – 9.8, Headed **Train and Truck Load Out and Transportation.**

"Spilled coal can be a source of particulate matter emissions particularly as the coal dries and where it is deposited on tracks and trafficked areas can be pulverised to produce a very fine and easily eroded particulate matter."



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They then list various “Best practice” applications and methods to control emissions of particulate matter from rail corridors include.

One such recommendation was --- Covering load (e.g. tarpaulins or lid);

Also on page 60 is Table 32 headed “Best Dust Mitigation measures Implemented and Proposed for Newstan Colliery.

Towards the end of this table (on page 63) a Rail Corridor Activity is “**Covering Load**” (e.g. tarpaulins or lid) Currently Implemented - **NO**

Whereas **Covering Trucks** Current Implementation - **YES**

**This was referred to Centennial Coal in 2011.**

**However, three years later , no movement has been made to cover rail wagons.**

## **Uncovered Empty Railway Coal Wagons - Vortexing Fine Dust Into the Atmosphere**

It is understood by us, that the returning wagons, though empty are subject to the venturi effect and coal fines are emitted into the atmosphere

Vide Appendix 1 and 2

## **Wallarah 2 Mine**

### **Wallarah 2 Mine Coal Rail Transport to Newcastle**

We understand the above will transport approx.100 000 tonnes per week (5.0mtpa) from Wyee to Newcastle for the next twenty eight years if the project is approved.

It is noted in an article published by Newcastle Herald dated 5<sup>th</sup> June 2013 in which the Project Manager Mr K Barry comments “There’s been a lot of talk about dust related to coal trains and whether wagons should be covered. If that ever becomes a requirement we should abide by that”.

Vide Appendix 3



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Our understanding is that each train operated by Wallarah 2 Mine will have thirty eight wagons. The capacity of each wagon is about 105 tonnes. The average coal train loaded is about 4000 tonnes. As each train delivery includes a return trip, therefore the annual quota of 5 000 000 tonnes of coal equates to 4.3 cycles per day (Waratah 2 EIS figures). To us that means 8.6 trips in uncovered wagons per day throughout residential areas.

### Uncovered Railway Wagons Total Trip Figures Scenario

Centennial Coal's 8 loads per day requires 8 empty returns, equating to 16 trips per day (venting coal fines both ways). Calculating 16 trips per day by say 300 days per year over a 30 year period = 144,000 trips (240,000,000 tonnes of coal) for the life of the project. That is a massive amount of emissions from uncovered wagons.

A similar calculation for Wallarah 2 Coal Project's 4.3 loads per day for a 28 year period results in 72,240 trips (140,000,000 tonnes) for the life of the project.

Therefore the total number of trips going through our local area, due to these two projects is 216,240 and moving 380,000,000 tonnes of coal. That is 216,240 opportunities for venting coal fines into residential neighbourhoods.

Potentially other mining companies may wish to freight coal via Port Kembla.

This is why covered wagons should be made a mandatory requirement for all Mining Projects.

**Newcastle Port** is the largest coal handling facility in the World, recording exports of 142.6 million tonnes of coal for the Financial Year 2012/2013. To date no coal wagons are covered, this poses serious health implications to the populations near coal railway export corridors and ship loading hubs.

### Covered Rail Wagons

#### Waratah Coal Qld

Reference is made to an article in the Newcastle Herald dated 8<sup>th</sup> June 2013. It reports Clive Palmer's Waratah Coal in Queensland, will be the first mining company in Australia to transport coal in covered wagons. A system for covering wagons has been successful in the United States of America.

Vide Appendix 4



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## **Variance of Northern Coal Logistics Project Environmental Impact Statement Daily Train Numbers Per Day and Wallerah 2 Coal Project Environmental Impact Statement**

We have a quote from Northern Coal Logistics Project Environmental Impact Statement, page 364 "If the Wallerah 2 Coal Project (Wyong Coal Joint Venture) proceeds it is likely that two or three coal trains could travel from Wallerah 2 Coal Project site to the Port of Newcastle".

We also have a quote from Wallerah 2 Coal Project Environmental Impact Statement, April 2013 Executive Summary page xiv "The average number of daily train movements associated with the Project is 4.3 cycles per day. However, there is a capacity to accommodate a theoretical maximum scenario of six train cycles per day, six day a week to assemble coal shipments at the Port of Newcastle"

We are amazed that the six cycles in 2013 now becomes only two or three in this EIS !

**One of the Director General's Requirements for Air Quality in this EIS is quoted below:**

**"reasonable and feasible mitigation measures to minimise dust emissions, including evidence there is no such measures, available other than those proposed:"**

The previously mentioned "Centennial Newstan Air Quality Impact Assessment" prepared by Global Environmental Solutions (SLR), Report No. 630.10002, dated 12th September 2011 recommended measures that were considered **Industry Best Practice**

It clearly states in Train and Truck Load Out Transportation, **covering loads is best practice.**

This was referred to Centennial Coal in 2011.

However, three years later , no movement has been made to cover rail wagons.

**We believe the Directors General's Requirement have not been met.**

## **Particulates as PM10 - Maximum 24 Hour Average Fassifern Public School NC6 dust collection point Northern Coal Logistics Project Environmental Impact Statement page 313**

The high readings at Fassifern Public School are of concern to us. We are aware Centennial Coal proposes to automate coal transfers at 6 million tonnes per annum. Considering the current high readings we suggest they should advance their automation schedule.

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### Coal Particulates and the Community

The houses of Fassifern/Fennell Bay Postcode 2283 are around 0.75 kilometres away from the Newstan coal areas and the Newstan Rail Loading Facility.

A Newcastle Herald article dated 4<sup>th</sup> August 2012 lists the following schools in our area with a direct distance in metres from the railway line

List of local schools in our areas near the main rail corridor exposed to dust from uncovered trains.

School	Distance (metres)	Enrolments
Awaba Public	208	29
Booragul Public	438	267
Charlton Christian College	0	610
Dora Creek Public	313	136
Fassifern Public	0	58
Lake Macquarie High	500	508
Morisset High	15	836
Morisset Public	458	239
St John Vianney	63	121
St Pauls High	63	908
Teralba Public	83	68
Total Students		<u>3,780</u>

Vide Appendix 5 & 6 (2 part scan)

### **Parliamentary Ministerial Concern**

The Hon. Greg Piper MP (State Independent Member for Lake Macquarie) in his June 2013 publication of 'Lake Macquarie Matters' had an article headed 'Clearing the Air', we quote in part.

"The National Pollutant Inventory, a Federal Government internet database, shows Lake Macquarie has been amongst the State's highest emissions of nitrogen oxides, sulphur dioxides and particulate matter, pollutants are considered to pose significant health risks"

Also in this article he is lobbying to have an independent, government – operated air quality monitor in Lake Macquarie. We congratulate our Hon. Member on this article.

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## In Conclusion

We are not against Centennial Coal or other coal mining companies. Mining brings wealth and employment to our national and local areas.

However, we believe the Directors General's Requirement on Air Quality has not been met.

Also due to the large increase in coal operations and transportation of coal by the Northern Coal Logistics Project we submit the social implications for the planned increases of transportation of coal in uncovered wagons venting fines into the atmosphere in Lake Macquarie coupled with the double whammy of increased coal ash fallout by Eraring Power station in our areas is completely unacceptable.

We, the Rathmines Progress Association have put forward the reasons for our concern. It is our belief that all coal wagons loaded, or returning empty should be covered.

Legislators should make it a mandatory requirement for all approvals. In the mean time could it be a requirement applied to the Northern Coal Logistics Project.

Yours Faithfully,

W McArthur

Hon. Secretary

LATE EXTRA FINAL

Reference Newcastle Herald dated Monday 10<sup>th</sup> November 2014, heading "Cover coal wagons plea"

We refer to a petition to be tabled in State Parliament on Tuesday this week following from a Parliamentary Enquiry into the Environmental Authority's management of coal train pollution monitoring. The petition is signed by 10,346 people, who are residents in coal affected communities including Newcastle, the Hunter Valley and Illawarra, Gloucester, Gunnedah, Lithgow and the Blue Mountains.