

7th February 2020

NSW Dept. Planning, Industry & Environment

GPO Box 39

SYDNEY NSW 2001

Dear Sir/Madam,

Submission: Mt Piper Energy Recovery Project Application **Number** SSD-8294

I object and equally oppose this proposal for the following reasons and believe this project if approved will be detrimental across many fronts for this community.

The impacts regarding emissions, soil, water, bush fire, socio, cumulative, transport and air quality with unacceptable wording i.e. Likely, be negligible, low risk, unlikely, modelling and averaging wording is no guarantee that there will be no harm or will likely have various impacts to this community. Yet again, we are presented with the “negligible impact” statements which we have seen before in this location which led a small community of Blackmans Flat being relocated, until after a long history and monitoring of this area, which did *have* cumulative impacted risks (air, water, soil, socially and financially disadvantaged, health and non-inclusive of community) acknowledged by the Dept of Planning NSW. This area in fact still does. “Considered to be a very low risk of cumulative emissions exceeding criteria or likely be negligible”. To say that there is a reduction of emissions due to Wallerawang PS being decommissioned is inadequate presumption and not inclusive of:

CUMULATIVE IMPACTS overarch all items in this Development Application.
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1.

- increase in production with modifications coal supplies Centennial operations. i.e increase in stockpiles at pit tops Springvale, Western Coal Services washery, Centennials Lidsdale railway siding
- other proposals in the area or west of Lithgow which will see increase in road transport along Castlereagh Highway. i.e. EnergyAustralia's potential for increase in contractors for removal of ash off site road haulage;
- EnergyAustralia seeking outside Lithgow sources of coal for MPPS i.e increase in coal via rail transport exposed trains to MPPS proposed rail unloader Pipers Flat
- Angus Place will go online this year and will increase on private haulage road.
- Interim road haulage from Centennial Clarence Colliery to MPPS
- BetterGrow proposal will utilise 18% of site for his industry and the remaining land will be open for opportunities of likeminded business to lease.
- Mt Piper Power Station stockpile 3-500,000 tonnes of exposed coal on site,
- 25 million+ tonnes of toxic fly ash exposed + unrehabilitated Kerosene Vale ash repository
- bordering to the east of MPPS is Centennial Coals Western Coal Services with the capacity holding of 830,000 tonnes on site exposed,
- Awaiting MPPS consultants' report for the leaching of MPPS fly ash into the ground water which presented over 12 months ago,

- Centennial – Western Coal Services – LDP6 discharge – 2019 recent reports show EC alone reached 7,000 us/cm, flows into Neubecks Creek and into the Coxs River. (Note the headwaters of the Coxs River approximately 8 klms salinity has never changed in over 10 years with readings of 70-90 us/cm). Ref. [Lithgow Environment Group volunteer water monitoring project](#). [Lithgow Environment Group water monitoring historic Streamwatch database](#)
 - Bush Fires – cannot be excluded. It has been noted that due to drought and 2010 fires burning soil and fuel load that Chromium 6 had been recorded. One can presume response for this is that we are unlikely to have such horrendous situation due to the massive areas burnt, but I refer to [Professor Ross Garnaut initial report 2008 report and review](#) “a widescale review into the impact of **climate change** on Australia and its economy, and came to a conclusion: the nation would face a more frequent and intense fire season by 2020”.
2. I do not accept and reject the current mode of air quality monitoring in Lithgow and especially at MPPS. Whilst we have been told there is 24/7 monitoring. I note that under the current legislation MPPS does not have to report on all emissions required or is actual 24/7 monitoring. i.e. “24.2.1 Quality The assessment highlighted that the **predicted** contribution of the project to **1-hour average** SO₂ concentrations is **likely to be negligible**”. To give confidence and what any community deserves which historic and current industrial air quality data/impacts, I ask for the *government* – Dept of Planning Industry and Environment, OEH, Scientific Atmospheric Division to manage, monitor, report and immediately place a stand-alone independent real time 24/7 monitoring system i.e. [Katoomba Air Quality Monitoring Unit](#). Why is that Bathurst and Singleton the closest real time monitoring system and have done for years, but not in Lithgow?
 3. Lithgow is historical known for its ongoing risk with coal seams burning which presented again with Gaspers Mt fire, which re-activated numerous locations across Lithgow. Cullen Valley Open Cut mine (caretaker mode – approximately 6 kilometres west of MPPS) is historically known representing and still does.
Management of the emission stack is not included on how this will be maintained. One of the most significant parts is the height of the stack which seems to be failing in this proposal. The current height of the stack will be detrimental to community, land, air, water, Flora and Fauna. Ref: [EPA Approved Methods for Modelling and Assessment Air Pollutants in NSW](#)
 Ref: <https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/air/mod3p107268.pdf?la=en&hash=5991A3E99F4B188B494A93BB1CE6435041FC4621>
 4. **Transport by road.** The current requirement to reduce landfill and greenhouse gases is noted and the best-case scenario *has not been included* in this EIS which is to reduce the landfill emissions, increase congestion impacts on the roads, to have a facility to reduce all of those impacts at the nearest location would be SYDNEY. Whilst there has been a road traffic modelling study of transport through the preferred routes for existing **traffic a scenario is required** showing what the increase of traffic will be in 5, 10 15 years the amount of vehicular emissions transporting RDF 120 kilometres to Lithgow. Include future on cost (is it financially viable?) for contractors transporting in 5 10 15 years
 5. **Temperature Inversions** – there is not a single mention anywhere in the EIS about Temperature Inversions, specifically not in Section 10 Air Quality and Odour. Yet they are a

regular occurrence in Blackmans Flat, Portland, Wallerawang and Lithgow CBD, especially during winter.

6.

Human Health Risk

12.2.2 Population

"These indicators generally reflect the vulnerability of the populations, its ability to adapt to environmental stresses, and are important to highlight from an equity point of view. The project will be implemented within a community that may have some increased susceptibility to impacts from the project, should these be of significance".

Again, another reason for rejecting this project. No one can really advise now, as based on modelling on what those health impacts will be on individuals, possible loss of business due to contamination with small hobby farms with example of existing neighbours to EnergyAustralia i.e. Jannei Goat Dairy Farm (milk and cheese products) or the Premier poultry facility Pipers Flat road (approximately 90,000 chickens on site). Include the cost of additional burden on health and the quality of life for Lithgow residents.

Additional comments : This very project whilst going on modelling cannot give a tick of 100% guarantee of no harm to those who do live in the area and are already financially disadvantaged who do grow their own vegetables/fruit, eggs/meat to live within their means. This is increasing financial vulnerability for every individual trying to manage with what they have. Unacceptable burden to those who are disadvantaged. Likely increase on demand for financial support, likely increase in health care needs, individuals have lost their means to maintain their independence, lifestyle, loss of worth. This whole project is not inclusive of Lithgows community with likely individual impacts either, loss of business, lifestyle, loss of worth, increased medical needs or death.

8.

14.2.6 Hydrology

Table 14-3 Summary of local surface water quality.

Again, reason for rejecting this proposal, given the existing hazardous discharges/contamination noted in summary and historical mining footprint F14-2 image with the substructure of the ash repository is a honeycomb of old mine workings, is an unstable and fractured environment. See attached.

9.

15. Transport ; 15.2.2.1 Existing Road Network

Transport:

I reject and oppose both preferred options for transport. Increase in traffic into the future has not been considered and how those impacts will reflect on communities with the preferred options. This pilot project if approved needs to be located at an acceptable location in Sydney. This will ensure least impacts via roads, reduce emissions with vehicular activity movements, reduce impacts on local communities, reduce the costs to contractors transporting to be economically viable into the future given the increase in all costs to a contracted transporting truck company.

Existing Road Network

As stated in paragraph 3, the Castlereagh Highway is a state rural highway.

Reason for rejecting:

- Lithgow is a transition town and one of its main attractions is the natural areas with Lithgow City Council targeting campaign for future Eco-Tourism to increase viable economic sustainability. The Gardens of Stone Alliances current [Destination Pagoda Gardens of Stone Proposal Plan report and summary](#) launched in Lithgow April 2019 is yet another project stream ready to go to increase sustainable eco-tourism, and attract 'tree-changers' seeking to escape the City to a clean-green environment.
- Castlereagh Highway is a secondary tourist highway, increase in traffic will deter current and new visitors who travel along this quiet highway who come to this area well known for its natural areas, camping, bushwalking, birding, canyoning, ecologist, abseiling to name a few leisure activities. Those visitors are not coming to see a RDF factory, open-cut mines, coal waste dumps - they are coming to be removed from just that, traffic, noise, pollution. This hardly compares to the number of visitors who will inject into the local economy, far more than 16 permanent workers.

10.

16.3.3 Operational Noise Assessment ; 16.5.2 Operational Noise

Operational Noise Assessment

"This section presents an evaluation of the magnitude and extent of any potential noise impacts associated with the operational phase of the Project.

Key Project operational emission sources and scenarios are summarised in Table 16-6. The predicted noise levels are then summarised in Table 16-7. Table 16-8 and Table 16-9.

*Predicted noise levels above the Project Noise Trigger Levels (PNTL) have been highlighted in **bold typeset**"*

I reject and oppose the current modelling as this is modelling with existing scenarios and predicted noise levels. It will not be until if this project did get approval that it may present at higher levels than predicted. Noise receptors to be in place for the entire project and be 24/7 real time monitoring to guarantee a truthful noise report. In the meantime people who live close to this location will have to endure a long process. Just another burden to community with already cumulative impacted area.

11.

18. Hazards and Risks

18.1.2

Methodology

Last paragraph: *"The existing MPPS facilities and operations were excluded from the scope of the PHA, as the Project is a stand-alone plant located adjacent to the existing MPPS, with a number of interfaces with the power station".*

I reject this assessment and it should have inclusion of a scenario of a combined effect if there is example flood/fire/explosion/earthquake/air quality.

12.

22.1 Table page 242 Bush Fire Risk Mitigation

Mt Piper Power Station (MPPS) and the proposed Energy Recovery Project immediate area *is* an high risk fire prone location given the recent Gospers Mt fire which did present spot fires at MPPS Friday 20th December 2019 closing the Castlereagh Highway in at least 4 locations 1 being at MPPS and 500 metres north of the power station, Boulder Rd directly across from MPPS, 2klms north the

village of Cullen Bullen engulfed (note in the near vicinity either side of the highway are at least 4 open cut exposed pits and coal-waste stockpiles in caretaker mode – yet another extreme risk if fire connects with underground coal seams). Large stockpiles of dried, baled garbage will be extremely fire-prone, even if in an enclosed environment.

As a resident of Blackmans Flat/Lidsdale as with 2 new sub-divisions residents in this vicinity went through 6 weeks of anxiety watching from our home/s as the fire slowly approached. We had no fire brigades due to the engulfment presenting in Lithgow CBD area as with the entire Newnes State Forest and Ben Bullen State Forest burning, lack of resources. The fire finally approached the ridge (Ben Bullen State Forest) above our home on Friday 20th December 2019 2pm. Luckily for us the wind factor was in our favour with a slow burn down the slope, as it came closer 6pm, still no resources. We went to Energy Australias land -haul road to defend our property only 300 metres from fire front. Still no one to support in case wind changed or fire jumped the private haul road. 8pm 2 water trucks from Mt Piper did arrive to put out any danger spots. The fire continued to burn Saturday 21st and our worst fears that this fire did jump the private haul road as we watched from our home. See attached photos. Luckily again with a helicopter passing over to access water to put out existing fires surrounding MPPS extinguished those locations. But we were still not out of the woods as for days after we watched Ben Bullen State Forest fire continue to burn.

13.

23. 5 Socio Economic Summary (Green House Gases and Health)

I object to this project being a green renewable project. Whilst the applications comments with reducing emissions/landfill, it will:

- with increase to already existing emissions in Lithgow.
- Increase health risks to the community. With already inadequate hospital specialists with most patients having to travel 100 kilometres to Nepean Hospital. Lithgow is an aging population with current inadequate services to cater for the elderly.
- Increase in road transport, congestion and emissions by way of road haulage transport RDF product
- ReGroup claim it is not economically viable to transport RDF product by rail. So how can it be economically viable to transport 150 kilometres to Lithgow? To reduce overall emissions this project should be centred closest to placement near Sydneys landfills. Not in Lithgow.
- Socially/financially disadvantaged vulnerable residents will suffer the most : SOCIAL IMPACT ASSESSMENT April 2013 – Centennial Coal: 2.1 Lithgow LGA – Overview COMMUNITY PROFILE: *“Until recently Lithgow was perceived to be an inland mining and industrial centre, however, recent developments have seen Lithgow recognised as an important tourism destination, heritage centre and a desirable residential area.*

“The Lithgow LGA includes World Heritage listed National Parks and State Forests, making Lithgow an important domestic and international visitor destination. Environmental protection and natural resource issues within the Lithgow LGA are becoming increasingly recognised and include: • Management of land within the Sydney Drinking Water Catchment Area; • Cumulative impacts of on-site effluent disposal; • Management of bushfire threat to settlement and areas of high biodiversity; • Impact of flooding on settlement areas; • Loss or reduction of environmentally sensitive land, water and biodiversity resources; • Encroachment of development on the scenic qualities of the landscape; • Management of contaminated lands”. Acknowledgment : James Marshall & Co.

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-5579%2120190227T040831.580%20GMT>

14.

CLIMATE CHANGE – LITHGOW IS A TRANSITION TOWN

- Lithgow is a transition town and Lithgow City Council are targeting the direction for Eco-Tourism which is well known that this area has been left behind with supporting a new direction with our natural areas which is an untapped viable economic sustainable asset.
- Lithgow City Council Community Strategic Plan 2013-2026 COMMUNITY PROFILE: *“Until recently Lithgow was perceived to be an inland mining and industrial centre, however, recent developments have seen Lithgow recognised as an important tourism destination, heritage centre and a desirable residential area*

Climate Change: [“The Lithgow City Council Community Strategic Plan 2013-2026 – Our Place...Our Future was adopted by Lithgow City Council at its Ordinary Meeting of Council held on 27 May 2013 \(Resolution Number 13-166\)”](#)

- Lithgow can diversify to renewable energy projects. Support from both State and Federal government have been lacking or seems to be being ignored for the needs of immediate funding to ensure Lithgow can succeed with sustainable economic viability.

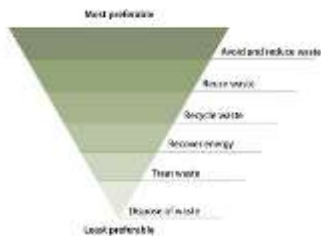
Recommendations:

- This project be refused outright for this location, remove Waste to Energy from government policy. The world in the last few years has moved towards circular economies with education of reduce/reuse as a top priority. If government continued with Waste to Energy, it would create complacency. “Well we can burn our rubbish now, no need to worry”.
- Lithgow to immediately have a 24/7 real time monitoring system managed by *Atmospheric Science Research Division, Department of Planning, Industry and Environment ... Office of Environment and Heritage i.e. Katoomba Air Watch Monitoring System*
<https://www.lithgowmercury.com.au/story/6126360/lithgows-air-to-be-monitored-over-next-12-months-photos/>
- Lithgow has contributed for over 100 years with adequate supply of coal/power generation at a huge cost to its community with excessive emissions, health impacts, contamination of lands, loss of high biodiverse conservation areas, employment. That the NSW Government provide immediate interim funding and support Lithgows transition. Which will include funding for current [Gardens of Stone Proposal Plan](#) and for renewable projects and training to support existing coal/energy employees as with apprenticeships. Lithgow is well connected to the grid and has numerous locations and varied renewable options to be successful. i.e Combined solar, wind and hydro project.
- That the NSW Government to support Lithgow and fund for Professor Andrew Blakers to assist Lithgows transition. <https://www.youtube.com/watch?v=y1IC6TiNDRc>

[Professor Andrew Blakers page 53 REPORT ON PROCEEDINGS BEFORE SELECT COMMITTEE ON ELECTRICITY SUPPLY, DEMAND AND PRICES IN NEW SOUTH WALES CORRECTED PROOF At Macquarie Room, Parliament House, Sydney on Wednesday, 21 February 2018](#)

- That the current LBL fees legislation be reviewed with current “Pay to Pollute” be “Pay to be Clean”. That any pollutants emitted, or discharged will acquire a significant fine for each individual emission with an action timeline to be clean, no emissions and no discharges; That NSW EPA staff or any other relevant government agencies to review reports and test on site with full costs paid by the company/ies to EPA or other relevant government agencies.
- That the current EPA policy **not acceptable** and be removed: Where further recycling is not feasible, it may be possible to recover the energy from the material and feed that back into the economy where this is acceptable to the community.

<https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/warr-strategy/the-waste-hierarchy>



Avoiding and reducing waste

The highest priority, **avoiding and reducing the generation of waste**, encourages the community, industry and government to reduce the amount of virgin materials extracted and used. The goal is to maximise efficiency and avoid unnecessary consumption through behaviours such as:

- selecting items with the least packaging or that require the fewest resources to produce
- avoiding disposable goods or single-use materials
- buying products that are recycled, recyclable, repairable, refillable, re-usable or biodegradable
- using leftover food rather than throwing it away.
- **Recovering resources**
- The second priority, resource recovery, maximises options for re-use, recycling, reprocessing and energy recovery.
- Where avoiding and reducing waste is not possible, the next most preferred option is to **re-use** the materials without further processing, avoiding the costs of energy and other resources required for recycling. For example, many household and industrial items can be repaired, re-used, sold or donated to charities.
- Re-use (without further processing) and recycling (processing waste materials to make the same or different products) keeps materials in the productive economy and benefits the environment by decreasing the need for new materials and waste absorption.
- Where further recycling is not feasible, it may be possible to recover the energy from the material and feed that back into the economy where this is acceptable to the community.
- Some materials may be inappropriate to re-use, recycle or recover for energy and instead require treatment to stabilise them and minimise their environmental or health impacts.
- **Treatment or disposal**
- Finally, the waste hierarchy recognises that some types of waste, such as hazardous chemicals or asbestos, cannot be safely recycled and direct treatment or disposal is the most appropriate management option.

Thank you for accepting my submission and would like to be notified of the outcome of this project.

Yours truly

[Redacted Signature]

Lithgow.

Additional References and Images:

- 3 February 2020

More than 270 scientists have signed an open letter to Australia's leaders calling on them to abandon partisan politics and take action on climate change. <https://climate.anu.edu.au/news-events/news/scientists-sign-open-letter-australian-government-urging-action-climate-change>

- References:

¹Press release 24 September 2018 Brussels Environment. **Commission reviews implementation of EU waste rules, proposes actions to help 14 Member States meet recycling targets** : Legal obligations on the management of municipal waste are laid down in the [Waste Framework Directive](#).

These include a 50 % municipal waste preparing for re-use/recycling target to be achieved by 2020. The Directive was recently revised to include new and more ambitious targets: 55 % to be achieved by 2025, 60 % by 2030 and 65 % by 2035. The revised Packaging and Packaging Waste Directive introduces a new plastic packaging recycling target of 55% to be reached by 2030.

https://ec.europa.eu/info/news/commission-reviews-implementation-eu-waste-rules-proposes-actions-help-14-member-states-meet-recycling-targets-2018-sep-24_en

- Large stockpiles of dried, baled garbage from Sydney stored at the RDF will be extremely fire-prone, and pose an unacceptable human health risk if it should catch on fire. Spontaneous combustion of these waste stockpiles is another potential safety risk and health hazard even if in a contained enclosed area there is still risk events from pick up to destination and on site with transfers by truck to facility. **(Note: There have been numerous fires at recycling plants recently eg.**

25 November 2019: Industrial fire sends fireballs, thick smoke into the air at Cleanaway waste facility in South Guildford - <https://www.abc.net.au/news/2019-11-25/industrial-fire-at-waste-facility-in-south-guildford-perth/11735442> That Cleanaway recycling facility contained pallets of compressed plastic and compressed cardboard blocks destined for recycling.



Photo: [Smouldering pallets in front of a South Guildford factory. \(ABC News: James Carmody\)](#)

Tuesday, 28 January 2020 Third Cleanaway recycling plant hit by fire in three months, as Dardanup-based facility damaged <https://thewest.com.au/news/perth/third-cleanaway-recycling-plant-hit-by-fire-in-three-months-as-dardanup-based-facility-damaged-ng-b881445209z>

2016 report commissioned by the Commonwealth Department of the Environment by The Institute for Sustainable Futures (ISF) - Fattal, A., Kelly, S., Liu, A., Giurco, D.2016., Waste Fires in Australia: Cause for Concern? Prepared for the Department of Environment, Canberra by the UTS Institute for Sustainable Futures, Sydney.

3.2 AUSTRALIAN WASTE INDUSTRY AND FIRES. This section provides a brief outline of the rate of occurrence of fires in the waste industry in Australia and overseas. According to the most recent annual reporting of statistics published by fire departments across Australia there were 5,652 rubbish fires in NSW1, 3,583 other fires (which includes rubbish) in Western Australia, 1,003 outside rubbish fires in South Australia; and 1,723 (16%) of all fires attended by the fire services in Tasmania. Based off the data supplied from New South Wales, we can see that organic products, including green waste, timber waste and compost, are those more likely to combust. There are two types of landfill fires: above surface and underground. We note that spontaneous ignition can occur when products have been stored for only a short period of time, particularly during the early stages of anaerobic decomposition. (This Report is equally relevant to the BetterGrow proposal at Wang Power Station)



Photo: Temperature Inversions at Mount Piper Power Station can occur at any time of the year, but more frequently in Winter. This one was on 3 January 2004.

The proposed stack will only be 70m high, compared to Mount Piper PS stack at 250m high (3.6 times lower) – **see page 59 SSD8294: Figure 3-4 comparative Illustration in the Reference Facility – Rudersdorf, Germany.** This is not high enough to penetrate Temperature Inversions. Harmful air emissions will become concentrated under these Temperature Inversion blankets for many hours, particularly while residents are sleeping, having major health implications.

Ref: [EPA Approved Methods for Modelling and Assessment Air Pollutants in NSW](#)

Ref: <https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/air/mod3p107268.pdf?la=en&hash=5991A3E99F4B188B494A93BB1CE6435041FC4621>

([The Building Code of Australia](#) contains recommendations about chimney and flue heights. Chimneys need to be high enough to ensure that smoke is directed away from where it might be harmful to neighbours.).

It should be noted that emissions from the RDF are cumulative ie. In addition to emissions from MPSS (not addressed in EIS). The EIS claims (10.2.2 Baseline Air Quality) that there have been no exceedances of PM10, PM2.5, SO2, or NO2 at Blackmans Flat or Wallerawang. This conflicts with the NSW Health Sydney West AHS submission on the Mount Piper Power Station Extension Proposal in 2010, included below

2.7 NSW Health Sydney West AHS

2.7.1 Submission

NSW Health strongly supports the view that the proposed CCGT gas operated plant represents the more acceptable option in terms of human health effects.

The potential increases in exposure to sulphur dioxide from the USC plant is of most concern, but there are other issues in relation to likely increments in other pollutants (mercury, dioxins, PAHs and regional ozone) associated with the USC coal option.

Sulphur dioxide is of most concern due to:

- Existing short-term concentrations exceeding guideline values
- Significant predicted increments with USC option
- Emerging health evidence that more stringent short term sulphur dioxide health guidelines are warranted

High rates of pre-existing respiratory and cardiovascular disease occur in the local area. SWAHS believes that the air quality assessment is based on a year with the lowest air pollution impacts, so that actual air quality may be poorer than predicted.

The location of the peak air pollution impact is on two of the most disadvantaged suburbs in SWAHS,

potentially exacerbating existing health inequalities. Tables 8 and 10 in the Air Quality Assessment provide maximum monitored 1-hour SO₂ concentrations at Blackman's Flat and Wallerawang from 2001-2008. This data indicated that the existing air quality criterion has been exceeded in three of the eight years. The modelling suggests that exceedances of the criterion in the domain could have occurred up to 5 times in 2001.

Monitored data averaged over 10-minutes is not provided in the assessment. Estimates of sulphur dioxide impacts of the existing plants averaged over 10 minutes (Table 13) suggest exceedances of the 10-minute criterion occur more frequently than the 1-hour.

The modelling provided predicts that the 10-minute and 1-hour sulphur dioxide impacts from the USC

plant will exceed the existing Mt Piper impacts, particularly at Wallerawang (Table 13). The distribution of the impacts for the worst hour of the modelled year are shown in Figure 13. This demonstrates that significant increases in sulphur dioxide exposure from Mt Piper are expected over the same region most impacted by Wallerawang power station emissions, which is around the township of Wallerawang. Unfortunately the figure provided does not include the cumulative impact of all three sources.

DECC air quality assessment criteria were set in 2002. Subsequently the World Health Organisation has reviewed the health effects of sulphur dioxide (WHO 2006). The review found that while there was little new information on the respiratory effects of sulphur dioxide, reappraisal of earlier studies had focussed attention on the need to control exposures over shorter periods of time.

A suggestion of a separate effect of sulphur dioxide on the autonomic nervous system emerged in 2001. The WHO review noted that epidemiological studies are detecting adverse health effects (admissions for respiratory and cardiac disease, mortality) of sulphur dioxide at quite low ambient concentrations.

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SINCLAIR KNIGHT MERZ

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In regard to birth outcomes, sulphur dioxide has been associated with low birth weight and premature birth in a number of studies (Sram 2005).

The WHO review also recommended that the short term exposure guideline be set for exposure over 10 minutes at 0.0118ppm (500ug.m3) as this is the exposure period over which acute health effects develop. This is almost 50% lower than the DECC criterion used in this assessment

The health status of people living in the Lithgow LGA is on many measures worse than in other parts of NSW. Some of the villages within this LGA will be those most impacted by emissions from the proposed power plant. These communities already have high levels of relative disadvantage, making them more susceptible to additional health impacts from environmental stressors such as air pollution.

Furthermore people in the Lithgow LGA already experience high levels of morbidity due to respiratory and cardiovascular diseases, the conditions most likely to be aggravated by exposure to sulphur dioxide.

The most recent Air Quality Guidelines from the WHO are emphatic about the need to consider the impacts of air pollution sources on disadvantaged populations. The proposal to continue monitoring of sulphur dioxide and nitrogen dioxide at Wallerawang and Blackman's Flat is also strongly supported.

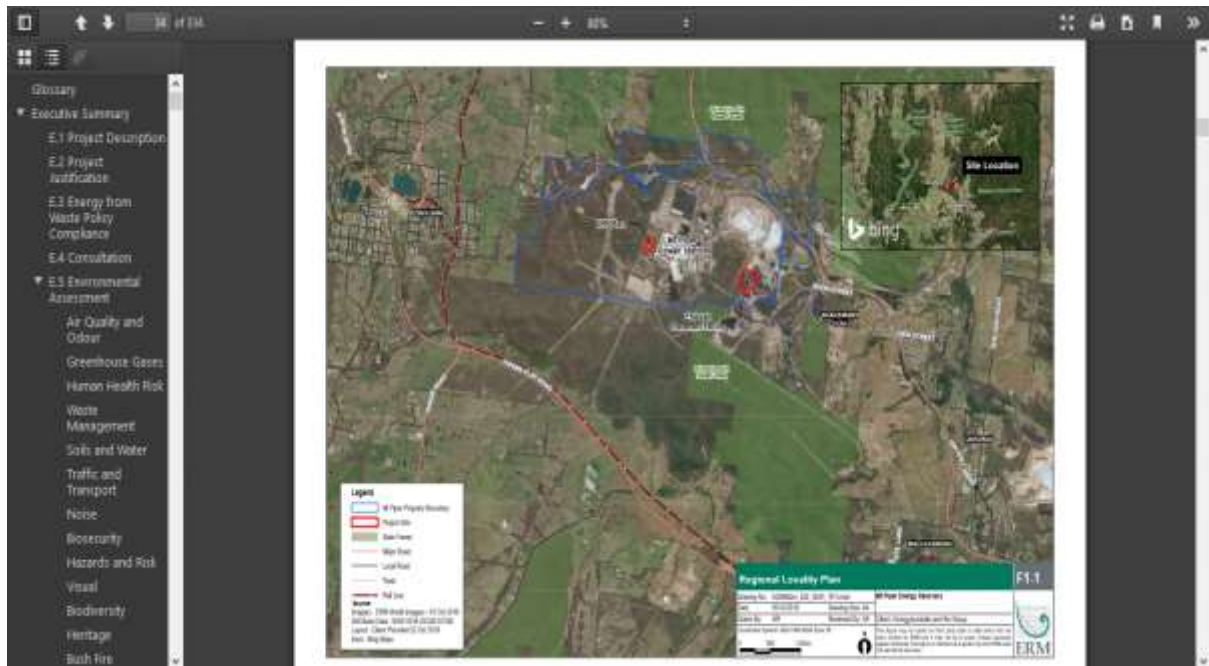
We have also carefully reviewed the impacts on water quality and availability and under current supply arrangements the proposal does not appear pose any problems in terms of health. Water availability in the Lithgow area is an ongoing issue that requires close monitoring by the relevant agencies.

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<ul style="list-style-type: none"> + Load-based licensing + Emissions trading - POEO Public Register <ul style="list-style-type: none"> Terms of use: POEO public register Search for licences, applications and notices Search for penalty notices Search for prosecutions and civil proceedings Enforceable undertakings Exemptions and approvals Licensing FAQs List of licences Unlicensed premises still regulated by the EPA National Pollutant Inventory + Compliance audit program + Reporting and managing incidents + Wind farm regulation NSW Gas Plan Regulation + Gas industry in NSW + Native forest bio-fuel + Authorised officers 	<p>premises, see using LHA gas</p> <p>Summary</p> <p>Licence number: 13007 Annual return start: 01 Jan 2018 Annual return end: 31 Dec 2018 Date received: 01 Mar 2019</p> <p>Fee-based activities and associated pollutants subject to load based fees for this licence: Generation of electrical power from coal</p> <table> <tr> <th>Assessable pollutant</th><th>Assessable load (kg)</th><th>Pollutant fee</th></tr> <tr> <td>Nitrogen Oxides</td><td>24,488,170.000</td><td>\$1,102,418.00</td></tr> <tr> <td>Sulphur oxides</td><td>36,334,106.000</td><td>\$385,526.67</td></tr> <tr> <td>Selenium - Enclosed</td><td>0.000</td><td>\$0.00</td></tr> <tr> <td>Salt - Enclosed</td><td>0.000</td><td>\$0.00</td></tr> <tr> <td>Mercury</td><td>25.190</td><td>\$13,364.05</td></tr> <tr> <td>Total suspended solids - Enclosed</td><td>0.000</td><td>\$0.00</td></tr> <tr> <td>Fluorides</td><td>315,236.000</td><td>\$205,892.13</td></tr> <tr> <td>Arsenic</td><td>15.530</td><td>\$3,894.86</td></tr> <tr> <td>Benzo(a)pyrene</td><td>0.216</td><td>\$30.21</td></tr> <tr> <td>Lead</td><td>12.420</td><td>\$658.92</td></tr> <tr> <td>Fine Particulates</td><td>106,373.000</td><td>\$64,129.62</td></tr> <tr> <td>Coarse Particulates</td><td>129,784.000</td><td>\$10,919.81</td></tr> <tr> <td>Total pollutant fee:</td><td></td><td>\$1,786,834.27</td></tr> <tr> <td>Administrative fee:</td><td></td><td>\$51,471.00</td></tr> <tr> <td>Load based fee:</td><td></td><td>\$1,735,363.27</td></tr> </table>	Assessable pollutant	Assessable load (kg)	Pollutant fee	Nitrogen Oxides	24,488,170.000	\$1,102,418.00	Sulphur oxides	36,334,106.000	\$385,526.67	Selenium - Enclosed	0.000	\$0.00	Salt - Enclosed	0.000	\$0.00	Mercury	25.190	\$13,364.05	Total suspended solids - Enclosed	0.000	\$0.00	Fluorides	315,236.000	\$205,892.13	Arsenic	15.530	\$3,894.86	Benzo(a)pyrene	0.216	\$30.21	Lead	12.420	\$658.92	Fine Particulates	106,373.000	\$64,129.62	Coarse Particulates	129,784.000	\$10,919.81	Total pollutant fee:		\$1,786,834.27	Administrative fee:		\$51,471.00	Load based fee:		\$1,735,363.27
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Mt Piper Annual report – licence fees 2018.



Map of project site and bordering areas.



Image: View from our home looking towards Newnes SF 12.12.19 4pm



Image from our home Newnes SF 14.12.10 8.45pm



Image Wolgan Road Ben Bullen State Forest 16th December 10am



Image: Back of our house 16th December 2019 6pm. Back burn Ben Bullen SF



Image: Our home it took days for this fire (Ben Bullen SF) to reach our home 20th December 4pm



Image: from our home 20th December 2019 8pm (Ben Bullen SF)



Image: from our home 21st December 2019 1pm (fire jumps private haul road) Ben Bullen SF