

Wambo Modification No.17

To NSW Department of Planning

In relation to the modification on the Wambo complex this is a formal objection on these grounds.

The SEARS request that the proponent complete air quality assessment on approved current method.

The EPA approved methods for the modelling and assessment of air pollutants in NSW was changed to the new 2016 requirements as gazetted on the 20th January 2017 addition no.8.

The proponent and TAS have not applied the new assessment criteria of PM2.5 standards, also the changes that will apply in 2025 where the annual average will be reduced to 7 rather at 8 as per the AAQ NEPM.

The Proponent and TAS have not referred to the PM10 annual average changes to 25 as the annual average. The proponent has used superseded average of 30, which was removed for modelling as per the government gazette.

Also the changes in the standards also changes the cumulative assessment criteria, the use of the old standard will not give complete assessment of the changes that apply.

The other issue that needs to be raised is the behaviour of the proponent as reported in the Newcastle Herald Thursday 27th April 2017, of the concerns with neighbours of not complying with directives or conditions set on the company to comply with, which raises concerns of actual rehabilitation standards and if the company will comply with directives set by departments.

On these conditions the application needs to be re-addressed to meet the requirements set.

PROTECTION OF THE ENVIRONMENT OPERATIONS (CLEAN AIR) REGULATION 2010

I, David Fowler, Acting Chief Environmental Regulator, Environment Protection Authority (EPA), with the delegated authority of the EPA, publish the document "*Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*" (2016) in accordance with clause 3 of the *Protection of the Environment Operation (Clean Air) Regulation 2010*. This document takes effect upon publication in the New South Wales Government Gazette.

David Fowler,
Acting Chief Environmental Regulator,
Environment Protection Authority.



**Approved Methods for the
Modelling and Assessment of
Air Pollutants in New South
Wales**

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Environment Protection Authority

Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales

7.1 SO₂, NO₂, O₃, Pb, PM_{2.5}, PM₁₀, TSP, deposited dust, CO and HF

7.1.1 Impact assessment criteria

Table 7.1: Impact assessment criteria for SO₂, NO₂, O₃, Pb, PM_{2.5}, PM₁₀, TSP, deposited dust, CO and HF

Pollutant	Averaging period	Concentration		Source
		pphm	µg/m ³	
Sulfur dioxide (SO ₂)	10 minutes	25	712	NHMRC (1996)
	1 hour	20	570	NEPC (1998)
	24 hours	8	228	NEPC (1998)
	Annual	2	60	NEPC (1998)
Nitrogen dioxide (NO ₂)	1 hour	12	246	NEPC (1998)
	Annual	3	62	NEPC (1998)
Photochemical oxidants (as ozone)	1 hour	10	214	NEPC (1998)
	4 hours	8	171	NEPC (1998)
Lead	Annual	—	0.5	NEPC (1998)
PM _{2.5}	24 hours	—	25	DoE (2016)
	Annual	—	8	DoE (2016)
PM ₁₀	24 hours	—	50	DoE (2016)
	Annual	—	25	DoE (2016)
Total suspended particulates (TSP)	Annual	—	90	NHMRC (1996)
		g/m ² /month ^a	g/m ² /month ^b	
Deposited dust ^c	Annual	2	4	NERDDC (1988)
		ppm	mg/m ³	
Carbon monoxide (CO)	15 minutes	87	100	WHO (2000)
	1 hour	25	30	WHO (2000)
	8 hours	9	10	NEPC (1998)
		µg/m ³ ^d	µg/m ³ ^e	
Hydrogen fluoride	90 days	0.5	0.25	ANZECC (1990)
	30 days	0.84	0.4	ANZECC (1990)
	7 days	1.7	0.8	ANZECC (1990)
	24 hours	2.9	1.5	ANZECC (1990)

a. Maximum increase in deposited dust level.

b. Maximum total deposited dust level.

c. Dust is assessed as insoluble solids as defined by AS 3580.10.1-1991 (AM-19).

d. General land use, which includes all areas other than specialised land use.

e. Specialized land use, which includes all areas with vegetation sensitive to fluoride, such as grape vines and stone fruits.