

LAKE MACQUARIE - CENTRAL COAST
Coal-ash Community Alliance inc.
Community action for a cleaner environment

P.O. Box 1024 Toronto N.S.W. 2283 coalashalliance@gmail.com

Bayswater Power Station Upgrade

To
Department of Environment and Energy
AGL Macquarie Pty Limited

The Coal-ash Community Alliance Inc. is a group of residents living near several power station ash dams within the Hunter, Lake Macquarie and Central Coast regions. Having met with and raised concerns with the Hon Matt Kean MP and also having members on the Eraring Power Station Ash Dam Expansion Community Consultative Committees appointed by NSW Planning, we submit this paper to the AGL Macquarie Pty Limited.

It has long been recognised and documented that all power stations and their ash dams have impacts on surrounding regions with breaches of EPA licensing related to monitoring of air, surface and groundwater, overflows, heavy metals plus further environmental externalities.

We object to the proposal based on the the following issues:

- Bayswater has continually been the subject of licence breaches resulting in fines and or Enforced Undertakings for Air & Water pollution including elevated Heavy Metal findings, fly ash spills and the sale of ash with unsafe heavy metal levels, even after acknowledgement of failures in their own practices year after year. These issues closely reflect the issues at other Power Stations in the region, documented in compliance reports with the cumulative Environmental impacts being duplicated, yet the breaches continue.
- There are no heavy metal concentration limits in the Bayswater Environmental Protection Licence yet numerous breaches of heavy metal concentrations have occurred above Australia's National Water Quality Guidelines for species protection, being ANZECC guidelines. Water impacts in the E.I.S indicate exceedences for boron, chlorine, chromium, copper, fluoride, lead, sodium and zinc in Tinkers Creek. EPL 8, Bayswater Creek, Hunter River, Plashett Reservoir & Pikes Creek also exceeded licensing approvals and recommended limits for species protection.
- The E.I.S. fails to give detail on how Bayswater ash will be reused and therefore casts doubt on AGL's ability to meet the projected reuse rates. The fact that Origin Energy's Eraring power station has had a long-standing reuse target of 80% now to be achieved by December 2021, with the best percentage over the past three years at 34.8%, raises even more doubt on AGL's ability to achieve the reuse rate set out in the E.I.S. How can the public be assured that the predicted amount of coal ash reuse will be achievable with such little information?

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- The C.C.A. is concerned that AGL's predicted re-use rate is only for their current annual production of new ash and does not include material stored within their dam over decades, leading to further water pollution through leachate and ash dam overflow.
- Only on-site ash processing for reuse and production of products is acceptable from an environmental perspective as sintering, production of Lytag and geopolymer products facilitate the decontamination of heavy metals, minimise raw ash transportation and allows stored ash to be processed beneficially at a faster rate in bulk.
- Any Salt Cake landfill proposal must be accompanied by a reassurance of World's Best Practice techniques to satisfy the community's concerns of further groundwater contamination at the hands of Bayswater. The C.C.A. does not believe this information is forthcoming through this E.I.S.

Yours sincerely,

Gary Blaschke

Gary Blaschke OAM
CCA Spokesperson

