

18 November 2013

Mr Paul Freeman
Senior Planner- Mining Projects
NSW Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Mr Freeman,

ROCKY HILL COAL PROJECT- GLOUCESTER

I refer to the Environmental Impact Statement (EIS) exhibited on the NSW Department of Planning & Infrastructure web site in relation to the construction of the Rocky Hill Coal Mine located in Gloucester, NSW.

The project involves the development of four separate and/or contiguous open cut pits, a coal handling and preparation plant with an overland conveyor and a rail load-out facility. This project has a projected life of between 16 and 21 years and is sought to produce up to 2.5million tonnes of run-of-mine coal per year. The site is located only 3.5km away from the Gloucester township, covering an area of 856ha.

The EIS has been reviewed by Hunter New England Population Health with particular attention paid to management of air quality, noise, water and other issues that may impact on public health.

Air Quality

Only a small number of private residences are directly impacted by particulate emissions, however, one – receptor 18, is significantly impacted by particulate emissions with a prediction of 23 exceedances of the 24 hour PM10 goal of 50 $\mu\text{g}/\text{m}^3$ in year 2.5 (Table 9.2 2A- 73). There are approximately seven mine owned residences that are subject to significant exceedances of this goal and substantial incremental PM10 impacts. Occupants of these residences should be fully informed of the potential impacts of the project. Where possible it would be desirable to decrease the impact on all residential lands, private and mine owned, so that the project does not reduce the number of habitable residences in the local community.

Emissions of dust from vehicles on haul roads are the major single source of PM10 from open cut mines. The PM10 level predictions for this project were based on the

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assumption that haul road watering and suppressant application would achieve a control efficiency dust emission of 90% (page 2A 49). Because this is a theoretical goal that is beyond the 50 to 70% control reported in the Katestone Report (NSW EPA commissioned Katestone report 'NSW Coal Mining Benchmarking Study: International Best Practice Measures to Prevent and / or Minimise Emissions of Particulate Matter from Coal Mining'), we recommend the proponent conduct a sensitivity analysis using lower estimates of 75% and 80% control efficiency values to provide a range of plausible PM10 levels that the community may experience.

In the risk assessment of additional deaths due to PM2.5 exposure on page 2B-33, the following calculation contains an error:

“= 0.02 per 100,000 or 2 per 100,000,000”

These are not equivalent as $0.02 \text{ per } 100,000 = 2 \text{ per } 10,000,000$. While a one order magnitude of difference may not meaningfully change the health risk in this assessment it would be useful to correct the several references to this statistic.

It should be noted that the proponent's estimate of the mortality effect of long-term exposure to PM2.5 are based on the 97.5th percentile of exposure. Therefore, some residences are exposed to levels greater than that presented.

Rainwater Tanks

The EIS does not provide comment on issues associated with drinking water, specifically for residents without a reticulated water supply and reliant on rainwater tanks. An analysis of potential water quality issues in relation to rainwater tanks at residences is recommended.

Hunter New England Population Health strongly supports the inclusion of measures to address potential impacts on rainwater tank drinking water quality. The installation of first flush systems for private rainwater tanks and implementing a tank cleaning program for properties affected by air quality impacts of the project are suggested strategies. The peak reference document in Australia for information in relation to rainwater tanks is enHealth's *Guidance on use of rainwater tanks*, accessible at:

[http://www.health.gov.au/internet/main/publishing.nsf/Content/DD676FA1241CDD0DCA25787000076BCD/\\$File/enhealth-raintank.pdf](http://www.health.gov.au/internet/main/publishing.nsf/Content/DD676FA1241CDD0DCA25787000076BCD/$File/enhealth-raintank.pdf)

It would be appropriate to utilise the above document and apply its recommendations and standards to rainwater tank systems within the vicinity of the mine in a proactive manner. A management system of taking complaints and rectifying issues identified should also be considered.

Social

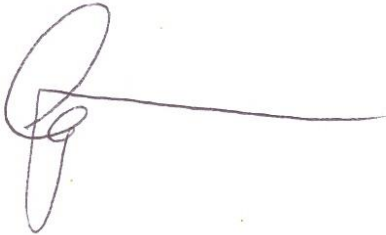
The EIS considers a range of project specific and cumulative social impacts of mining in the area, including the demand for housing, education and health services, and possible impacts on community identity and wellbeing. It is recommended that the proponent continue to monitor social impacts over time and make adjustments as necessary.

Noise

It is noted that there are a number of privately owned residences that will be negatively affected by noise if the Rock Hill Coal Project is approved. Consultation and mitigation measures should be maintained throughout the life of the project.

Should you require any additional information in relation to the above, please telephone Ms Stephanie Stratigos, Environmental Health Officer on 65151856.

Yours sincerely

A handwritten signature in purple ink, consisting of a large loop followed by a horizontal line extending to the right.

Dr Craig Dalton
Acting Director - Health Protection
Hunter New England Population Health