

2 May 2019

Ms Susan Fox
Planning Officer
NSW Planning & Environment
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SYDNEY NSW 2001

Email: susan.fox@planning.nsw.gov.au

Dear Ms Fox

Response to Submissions Report – Capacity Increase at the Regain Spent Potlining Facility, Tomago

I refer to your email of 2 April 2019 inviting commentary on the Response to Submissions (RTS) report for the modification of the Regain Spent Potlining Facility at Tomago. The modification involves increasing the capacity of the facility from 20,000 tonnes per annum (tpa) to 60,000 tpa, including altering the original site layout and key plant components to improve efficiencies.

The RTS has been reviewed by Hunter New England Population Health (HNEPH). Particular attention has been paid to issues which may have an impact on public health, including the proponent's response to our previous submissions to the Environmental Impact Statement, and issues raised in a meeting with HNEPH representatives on 4 February 2019.

The assumption that all PM₁₀ particulates would constitute PM_{2.5} particulates is a suitably conservative assumption provided the Environment Protection Authority (EPA) are satisfied with the modelled PM₁₀ levels. While the predicted PM_{2.5} levels are below 8 µg/m³, we note the National Environment Protection Council (NEPC) aim to move to annual average and 24-hour PM_{2.5} standards of 7 µg/m³ and 20 µg/m³ by 2025.

Hunter New England Local Health District
ABN 63 598 010 203

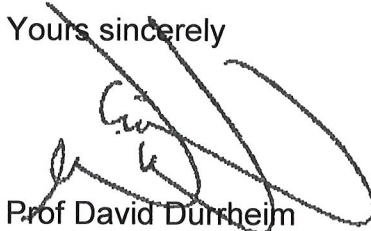
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The response provides the requested clarifications, including that the form of nickel emitted is not associated with non-threshold genotoxic effects.

Based on the request by the EPA for more information on cadmium, PAHs and benzo(a)pyrene, we will reserve our comments on health impacts until the EPA are satisfied with the accuracy and completeness of the exposure assessment.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Dunne', is written over the closing 'Yours sincerely'.

Prof David Dunne
Senior Staff Specialist – Hunter New England Population Health