

GREATER WESTERN  
AREA HEALTH SERVICE  
NSW HEALTH

Our Ref: D10/7116

Howard Reid  
Manager, Mining  
Department of Planning  
GPO Box 39  
Sydney NSW 2001

Dear Mr Reid

The Greater Western Area Health Service is pleased to have the opportunity to provide comment on the Environmental Assessment report for the Rasp project (Application 07\_0018)

Please find attached a copy of the Greater Western Area Health Service submission. I hope this will be of assistance to you in assessing the application.

Should you have any questions related to this submission please contact Dr Thérèse Jones, Manager Population Health for the Greater Western Area Health Service on 02 6339 5600 ([therese.jones@gwahs.health.nsw.gov.au](mailto:therese.jones@gwahs.health.nsw.gov.au)) or Mr Adam Capon, in NSW Health Environmental Health Branch on 9816 0534 ([acapon@doh.health.nsw.gov.au](mailto:acapon@doh.health.nsw.gov.au)). Mr Jason Harwood of the Population Health Unit in Broken Hill is also available to provide advice on local health issues and can be reached on 08 80801486.

Yours sincerely



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# **Greater Western AHS Submission - Rasp Mine Project**

## **August 2010**

Broken Hill has a population of approximately 20 000 people. There has been extensive mining of lead for a long period of time. The University Department of Rural Health and Greater Western Area Health Service (AHS) have worked together on lead issues in Broken Hill for a number of years with the NSW Government spending over 17.264 million dollars on strategies to reduce lead exposure within the community.

It is recognised that historical issues regarding lead exist in Broken Hill and that this submission relates to the activities of CBH Resources Ltd. It is important to note the location of the mining operation in the centre of town and the proximity to residential areas.

### **Traffic Noise**

It is noted that heavy vehicles will be used along Eyre Street. There is concern that the vehicle traffic will increase noise levels.

### **Noise and vibration assessment**

Exposure to noise and vibration also has the potential to cause adverse health impacts. The Department of Environment Climate Change and Water have assessed this section extensively and a Noise Management Plan should be developed and implemented by the applicant to the satisfaction of DECCW.

### **Air Quality**

Air quality impact assessment is generally satisfactory, but as the proposed project is centrally located in Broken Hill and in close proximity to a number of sensitive receptors; Greater Western AHS is concerned with the possible impact on existing air quality in the area. The number of real time dust monitors and their location must be decided based on air modelling and their ability to accurately measure air quality and wind patterns in the region.

The assessment indicates that the real-time dust monitoring will inform dust management in real-time. There are no contingency plans for situations where the dust management controls may not work. Restriction of certain operations to reduce emissions during those situations must be considered.

As the high volume samplers will be used to quantify lead in the dust emissions, their location must also be decided using the contour plots identifying high risk zones and after consultation with DECCW.

Heavy vehicles will be used along Eyre Street. There is concern that the vehicle traffic will generate increased dust levels in this area. This dust will have potentially high lead levels and will settle on roofs, houses and in yards, potentially increasing soil lead levels and may enter water private water tanks if present following rainfall.

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Also of particular concern is the potential for increased dust emissions from tailings dam and fugitive dust emissions from free areas on the site. Active surveillance and reactive management of the emissions from the tailing dam must be instituted.

### **Community Health**

Greater Western AHS and NSW Health have reviewed the risk assessment presented by CHB Resources which has identified lead as the main driver of health risk with regard to this proposal. While Greater Western AHS and NSW Health have no issues with the methods undertaken in the risk assessment it should be pointed out that a number of assumptions and uncertainties are present that have the potential to significantly alter its overall conclusions. These include assumptions around stabilisation of dust and dust control measures, bioaccessibility and knowledge of the community with regard to existing lead risk.

Current blood lead monitoring should go beyond the employees and contractors identified in the report and include monitoring of community members with a particular focus on children 0 to 5 years. It is noted that BHOP have committed to lead awareness and community education programs regarding lead

If NSW Planning were to approve this development application in addition to the proposed monitoring suggested by the proponent, Greater Western AHS make the following recommendations:

1. Given the current knowledge on blood lead levels and their effect on health, that lead is the main driver of the health risk assessment, the uncertainties presented above and the close proximity of the mine to a large population already affected by lead contamination, Greater Western AHS would be seeking to institute blood lead monitoring / surveillance of the population targeted specifically at the impact the mine was having on the population.
2. Given the assumption of community awareness around existing lead risk Greater Western AHS would be seeking to institute an appropriate community awareness and education program around lead risk.

Greater Western AHS and NSW Health have expertise in both these areas and are happy to provide NSW Planning with the structure for successful implementation of these recommendations as part of the licensing conditions.

3. An effective long term stabilisation and rehabilitation plan to reduce dust impact off the lease once the mining operations have ceased
4. A satisfactory update and approval of the health risk assessment around the dust control agents to be used on the site before operations commence

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Given that the health risk assessment identified backyard contamination as a major source of background contribution to lead, it may be in the company's best interest and as a good will gesture to the community to consider proactively engaging the community to remediate identified areas of high contamination.

### **Water resources**

There is the potential of increased dust containing lead in the immediate vicinity of the mining operation and in areas in the path of winds with potential for lead to be washed into private rainwater tanks. The bioaccessibility of lead from this source has not been included in modelling. Community members must be made aware of this potential through community education programs.

In the event that the proposed development is connected to Country Water's recycled water supply network and uses recycled effluent on site in the future, a detailed health risk assessment on this process should be submitted to Greater Western AHS for evaluation prior to commencement of the effluent reuse.