

12th October 2010

Attention: Kate Masters

Director
Major Infrastructure Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Ms Masters,

Re: Mount Piper Ash Placement Project – Portland Application No MP09_0186

I object to this modification on the grounds that it will enhance current cumulative impacts for the residents of Blackmans Flat and the surrounding environment. My concerns are the same as stated in many previous submissions¹ (see example below: 'Proposed Modification to a Development Consent MOD-77-9-2007-I – Mount Piper Ash and Brine Disposal).

I am a member of the Delta Community Reference Group Western Region, and have conveyed the communities concerns regarding the doubling in size of the ash repository². Delta have kindly provided presentations on ash management, but my concerns still remain that the current amount of ash of over 10 millions tonnes which would double if this application is approved and the health of those community members including loss of property value will be a direct impact from this expansion.

I have also raised the concerns with Delta about the stability of the ash repository, which if anyone from the planning department has taken the time to visit this site will realise the sheer size of the current repository is a major concern if it were to collapse. Whilst information has been given that all legislative requirements are met, there is no guarantee that a catastrophic collapse of the ash repository wall could not happen in the event of major flooding, earth tremors, and possible structural weakness due to the past history of blasting in the immediate area from Lamberts Gully Open Cut Mine (over 130 blasts, and 9.52% of blasts at Lambert's Gully mine during 2006 exceeded Licence air blast overpressure criteria of 115dB).

Whilst the current and projected demand for electricity is reality the community would like to see the department lead by example by transitioning to alternative power sources, reduce the current toxic impacts on a small community, the loss of property values, provision for a sustainable source of employment for this community, and last but not least an **inclusive approach** of this community within this approvals process.

Yours truly

1 See Appendix 1 below: Submission to Major Infrastructure Assessment Department of Planning - Proposed Modification to a Development Consent MOD-77-9-2007-I – Mount Piper Power Station Ash and Brine Disposal 14th October 2007

2 See attached Appendix 2: Minutes from Delta Western Region Community Reference Group Mt Piper Wednesday 17th February 2010

APPENDIX 1

14th October 2007

Major Infrastructure Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sir

Re: **Proposed Modification to a Development Consent
MOD-77-9-2007-i – Mount Piper Power Station**

I object to this modification on the grounds that it will enhance current cumulative impacts for the residents of Blackmans Flat and the surrounding environment. Which includes an open cut mine 200 metres from our backyard.

Reasons for objections are:

- Not accept any further fly ash in this location and should be removed from site. We already have 12 million tonnes in our backyard.
- Not accept any further brine at this location and be removed from site
- Not accept this as a modification it should be a new DA refer to **figure 2** 'Mt Piper Power Station Property Ownership' this clearly shows the area DP 804929 is not land owned by Mt Piper and needs to be acquired.
- This acquired land is moving even closer to the township of Blackmans Flat
- I dispute the distance of the new fly ash boundary being 1.5 klm. Measurement should be taken from the most eastern end.
- I dispute the distance for the most eastern end of fly ash boundary to Lidsdale. Lidsdale boundary starts at View St Lidsdale which is just over 2 klm not 4 klm
- Residents have raised more than visual effects of fly ash. Meeting with Mr Saladine residents complained about the dust, the noise, cumulative impacts on the township of Blackmans Flat. Those cumulative impacts are directly related to the Mt Piper Power Station and the coal industry which provides coal to Mt Piper. Further consultation with a

forum this year conducted by WRI showed clearly fly ash was a high priority, devaluation of property, health impacts of nearest residents,

- I dispute that the noise will be the same, as the eastern boundary will be closer to residents.
- I dispute that fly ash is benign. Mt Piper may well say they are complying with their sample test of fly ash and that may very well be. But we have 12 million tonnes of fly ash in our back yard which equates to a toxic waste dump with 12 million tonnes of excessive trace elements **not 1 sample**, some of those being Arsenic, Beryllium, Cadmium, Chromium (III), Chromium (VI), Copper, Lead, Mercury, Nickel, Selenium, Zinc; Radionuclides; Polychlorinated Dioxins & Furans, PAH's, PCB's, Cumene, very high levels of Fluoride & Boron compounds, all of which remain toxic **forever**.

This is the constituents of fly ash we also have those same constituents in brine (which is 3 times saltier than sea water) which will be placed on ash dam and airbourne as their water recycle systems uses this brine to dampen ash which I might add is an insufficient system to maintain airbourne flyash.

- I question the location of rust inhibitors used at this location to maintain rust corrosion of machinery, whether it be Chromium based or phosphate based at no place in this document does it state where this residual is placed or removed from this site. Which leads to me to believe its destination will eventually be the fly ash repository. What other toxic cleaning wastes are used for operations and not removed from site again the question is '**not indicated in this document that those toxic wastes are not removed from site?**', placement has to be the fly ash repository.
- *I dispute that the Fly Ash repository shall contain these excessive levels of Major Ions and trace elements given the substructure is sandstone and given that within the surroundings at close proximity is constant blasting. Example being Springvale Coal – Lamberts Gully Open Cut Mine has over the last 2 years conducted over 130 blasts and 9.52% of blasts at Lambert's Gully mine during 2006 exceeded Licence air blast overpressure criteria of 115dB. This location borders on Mt Piper property.
- There is no method to contain this toxic waste in the event of floods which would eventually be flushed into the waterways in the immediate area which flows into the Coxs River.
- Every year Delta Electricity in the Lithgow region uses:
 - 35 tonnes of Ammonia
 - 140 tonnes of Chlorine
 - 1600 tonnes of Sulphuric Acid
 - 1400 tonnes of Sodium Hydroxide (Caustic Soda)
 - 50 tonnes of Ferric Chloride
 - 10 truckloads of Carbohydrazide (organic corrosion inhibitor)

- 8.5 million tonnes of coal
- 8000 tonnes of fuel oil
- 10,000 tonnes of biomass
- 148,000 litres of lubricating oil

Carbohydrazide - is an organic oxygen scavenger used as a corrosion inhibitor in boilers. Its Material Safety Data Sheet (MSDS) says:

- *"Harmful to aquatic organisms, may cause long-term adverse effects in the aquatic environment" and*
- *"Do not allow to enter sewers or water courses" and*
- *"The product is not readily biodegradable".*

Sodium Hydroxide - So where do Delta's 10 truckloads end up?

References

- EPA website register for POEO licences – Licence No 3607 for 2006

Clearly the Department of Planning needs to work with Lithgow City Council for immediate action to rezone the township of Blackmans Flat to either 2v village or Industrial, Waste zone. As there is more industry than residents those industries and proposed industries are. Mt Piper Power Station which will need a new fly ash repository, enlargement of Mt Piper Power Station, Pine Dale Open Cut Mine Area A and Area B, Lambert Gully Open Cut Mine, Springvale Washery, Lithgow City Council Waste Facility, Proposed Nuebecks Creek Open Cut Mine, proposed Ferndale Mine, Invincible and Ivanhoe Open Cut Mines which all of these mines including the waste facility will increase heavy vehicles in our township.

I wished to be informed of the decision made on this Modification. I wish for my name to be withheld to any other parties including applicant.

APPENDIX 2

Western Region Community Reference Group

Mt Piper Power Station

Notes from the meeting held Wednesday 17 February 2010

Attendees: Jim Whitty, Alex Preema, Max de Haan, Steve Saladine, Barbara Milne, Margaret Miller, Julie Favell

Transgrid guests:

Apologies: Faye Vandermeier (who has now resigned), Ron Bidwell, Boris Hunt, Warwick Peckham, Sue Graves

Welcome and introductions

Steve Saladine introduced a team from Transgrid who had been invited to present to the meeting as they are proposing to upgrade high voltage networks and switchyards at Wallerawang Power Station and surrounding areas.

Steve Jones outlined the proposed works to the meeting noting that they were modernising the power system to bring it into line with the standard of other bulk supply points. In preparation for a community consultative phase (which is part of the approval process), a number of community group members identified potential issues for consideration including: the need for noise mitigation, the impact of large load deliveries on local roads, concern about EMF, re-vegetation and the need for a traffic management plan to manage impacts of vehicle movements including road safety and local schools.

The first phase is planned for early 2010 to mid 2013 while the second will begin in 2013 to later that year.

Action Items

On completion of the Transgrid presentation, the planned agenda for the meeting was resumed. Notes from the previous meeting were approved.

Rail Unloader Project update – the proposal for the development of the Cobbora coal resource near Dunedoo was raised and it was noted that the potential to transport coal to the Western region from other suppliers provides an important option for maintaining affordable coal supplies.

Operations Update

It was noted that Mt Piper was running reliably. Wallerawang had two units out over the Christmas during a period of low demand with one unit returning to service in early January. The second unit is on standby and a major outage is planned for winter.

Water Use and Management

An update on Oberon Dam water management was provided. It was noted that Delta was on 32% of its allocation from the Fish River scheme and that after rain Oberon Dam had returned to 10.28% of capacity. Both Western Power Stations were designed to use Fish River water. Cocks River water has higher salinity levels due to the long period of drought as no water had flushed through the system, however with recent rain, Lake Wallace was flushed out. A desalination plant producing 6 ML per

Notes from 17 February 2010 community meeting

day is being considered for installation at Wallerawang to reduce dependence on Oberon Dam water.

Roand -

The RO plant will treat the blow down water which will no longer be discharged into Coss River.

Mt Piper Ash Placement proposal

A short presentation was made to outline Delta's proposal for new ash placement areas.

Julie Flavell noted that Blackman's Flat residents consider that the two areas are too close to the township of Blackman's Flat. It was also noted that if Mt Piper doubles in size, and coal is the preferred fuel, that ash volumes would also double in size.

There was interest expressed in gaining a better understanding of the make-up of Mt Piper ash and there was a request for a presentation to be made at a future meeting.

Member's feedback

Alex Preema, Acclimatisation Society - raised the issue of the potential for nuclear power to be the way for future energy generation

Julie Favell, Blackman's Flat

- a) expressed concern about salinity in Nuebeck's Creek. It was observed by Steve Saladine that this could be the result of draining due to longwall mining and spillage from mines and that Delta is not discharging into this water course.
- b) on behalf of Lithgow Environment Group Julie noted they would prefer Mt Piper extension to be gas fuelled and to be air cooled.
- c) that jobs for young people in the area are an issue. Steve noted that he is a member of the Lithgow Business Advisory Committee and that they had recently had a presentation from the University of Western Sydney about the potential for a campus of the University to be established in the Lithgow region.

Next meeting - 26 May 2010 at Mt Piper

*Caroline
Adams*