



Lithgow Environment Group Inc.

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Preserving the Balance of Nature

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

14 October 2010

Dear Sir/Madam

RE: Mount Piper Ash Placement Project MP 09_0186

At its meeting of 16 September 2010 the membership of Lithgow Environment Group Inc. (LEG) resolved to oppose the Nuebeck's Creek and Ivanhoe No. 4 options, because of the adverse impact on native vegetation in Ben Bullen State Forest and Mount Piper Reserve.

On environmental grounds Lambert's Gully South and North are the least offensive options, but on human health and social grounds are devastating for sensitive receivers in Blackmans Flat. LEG members therefore can only support these options if Delta Electricity offers to buy up those residents in Blackmans Flat village who wish to sell up.

LEG members believe our Streamwatch water quality monitoring for Nuebeck's Creek and the upper Cocks River since 2006 confirms that Delta Electricity has not and cannot prevent highly saline metal contaminated brine and fly-ash leachate from polluting surface water and groundwater in the proposal area. This EA fails to address this, because the ash repository will not be lined, and no Licence Limits are proposed for Salinity, heavy metals, Fluoride or Boron.

The EA fails to address other toxic substances used in large quantities at Mt Piper power station and ultimately disposed of in the brine and ash dumps, including but not limited to water treatment chemicals and corrosion inhibitors like Carbohydrazide, Chlorine Dioxide, Ferrous Sulphate, Sodium Hydroxide, and Sulphuric Acid. The EA ignores testing for PCB's, known to occur in old Western Main Colliery (Lambert's Gully Mine) underground workings¹.

Lambert's Gully North and South are just 800m south and west of 13 homes in Blackmans Flat village. The Wind Rose's in the SKM Air Quality Report show that the average annual wind speed at Mt Piper is 2.5 metres per second (m/s), and the predominant wind is from the west-southwest. Noise and dust will therefore be propagated directly towards those 13 homes on most days. The Noise Report states that noise exceedances will occur even under neutral weather conditions, but the average wind speed of 2.5m/s shows such 'neutral' days are rare.

From past experience, therefore, LEG members do not believe that Delta Electricity can manage noise or dust associated with the disposal of 786,500 m³ of ash/year, or 2,100,000 m³/year if a new 2000 MW coal plant is built, so close to and downwind of 13 homes in Blackmans Flat.

¹ <http://www.smh.com.au/national/deadly-chemicals-buried-in-drums-20100605-xlra.html>

LEG notes that the Department of Planning also approved Kerosene Vale Stage 2 Ash Repository on 26/11/2008 claiming to have met all environmental requirements. Yet just 3 months later in February 2009 Delta Electricity was fined \$45,000 plus \$35,000 in Court costs in the Land & Environment Court for causing dust pollution from that very same facility.

LEG members also note that Delta Electricity is currently facing legal action in the Land and Environment Court for allegedly polluting the Coxs River from Wallerawang Power Station. Our Streamwatch monitoring data suggests that Delta Electricity may be similarly vulnerable to litigation for pollution of Sawyers Swamp Creek and Nuebeck's Creek.

Whilst our volunteers could spend their limited and valuable time writing a submission on this proposal, members have already lodged many submissions raising serious concerns about fly-ash and brine disposal at Wallerawang and Mt Piper Power Stations, including for the:

- o PINE DALE COAL MINE YARRABOLDY EXTENSION: APP. NO: 10_0041
- o NEW BASE LOAD POWER STATION (MT PIPER EXTENSION): MP 09_0119
- o INVINCIBLE OPEN CUT EXPANSION PROJECT: 07_0127 MOD 2
- o MOUNT PIPER POWER STATION WESTERN RAIL COAL UNLOADER: 06_0271
- o INVINCIBLE OPEN CUT MINE EXPANSION PROJECT: 07_0127 Mod 1
- o KEROSENE VALE STAGE 2 REPOSITORY AREA: 07_0005
- o LAMBERTS GULLY COAL MINE - ACCESS RAMP CONSTRUCTION (06_0017_MOD 1)
- o EXTENSION MT PIPER ASH & BRINE DISPOSAL: MOD-77-9-2007-I
- o INVINCIBLE OPEN-CUT PROJECT: 05_0065 - MOD 1
- o IVANHOE NORTH MINE: 05_0103
- o MODIFICATION ANGUS PLACE COAL PROJECT: 06_0021 MOD 1
- o LAMBERTS GULLY OPEN CUT COAL MINE EXTENSION: 06_0017
- o MODIFICATION MOUNT PIPER POWER STATION: MOD-1-1-2006
- o PINE DALE MINE MODIFICATION: 461-04 MOD
- o LITHGOW CITY COUNCIL SOLID WASTE LANDFILL: DA NO. 388/05
- o PINE DALE MINE OPEN-CUT MINE: DA 461-04

LEG members have donated their valuable time attending Delta Community Reference Group (Western Division) meetings, where many of our concerns have been raised but not acted upon. We have raised these issues in the numerous submissions above, only to have them totally ignored. We therefore will not waste time rewriting all these concerns again. Our time can be better spent working with other groups, the media, and through legal channels.

However we strongly urge the Department of Planning to consider all the concerns raised in all the above submissions regarding noise, dust, human health, surface water, groundwater, PCB's and other pollutants, and cumulative impacts associated with fly-ash and brine disposal.

Yours faithfully

Chris Jonkers
Natural Area Project Officer
Lithgow Environment Group Inc.