

11 December 2019

Mandana Mazaheri  
Planning Officer  
Department of Planning, Industry & Environment  
GPO Box 39  
SYDNEY NSW 2001  
By email: [mandana.mazaheri@planning.nsw.gov.au](mailto:mandana.mazaheri@planning.nsw.gov.au)

Dear Ms Mazaheri

**AGL - NEWCASTLE POWER STATION (SSI-9837)  
OLD PUNT ROAD TOMAGO**

I refer to the Environmental Impact Statement (EIS) exhibited on the NSW Department of Planning, Industry and Environment website in relation to a proposed Newcastle Power Station. The development by AGL Energy Limited (AGL) involves the construction and operation of a 250 megawatt gas fired power station and ancillary infrastructure including site access, gas pipelines and electricity transmissions lines.

Hunter New England Population Health (HNE Health) has reviewed the Environmental Impact Statement (EIS) report paying particular attention to the management of air quality, noise and other issues which may have an impact on public health.

**Air Quality**

It is noted that for the Impact Assessment Criteria (Appendix G Air Quality Impact Assessment, table 3.3) the criterion for PM<sub>2.5</sub> contains an error with the 24-hour maximum and annual mean reversed. This error however does not seem to be reflected elsewhere in the report.

When taking into account the cumulative air quality impacts, the air shed appears to be at the limit for PM<sub>2.5</sub> annual (at 8.1µg/m<sup>3</sup>) and while this development will add only a small increment (to 8.3µg/m<sup>3</sup>), the air shed already exceeds the PM<sub>2.5</sub> maximum annual concentration standard. It is noted also that the NEPC has included a reduction in long-term PM<sub>2.5</sub> targets as a simplified approach for an exposure-reduction framework, bringing the annual average target to 7 µg/m<sup>3</sup> and the 24-hour target to 20µg/m<sup>3</sup>, to be achieved by 2025.

Hunter New England Local Health District  
ABN 63 598 010 203

Hunter New England Population Health  
Locked Bag 10  
Wallsend NSW 2287  
Phone (02) 4924 6477 Fax (02) 4924 6490  
Email [HNELHD-EnvironmentalHealth@health.nsw.gov.au](mailto:HNELHD-EnvironmentalHealth@health.nsw.gov.au)  
[www.hnehealth.nsw.gov.au/hneph](http://www.hnehealth.nsw.gov.au/hneph)

## Acrolein

We are of the understanding that EPA will be requesting further information in relation to a number of air toxics, including acrolein. HNE Health requires the EPA exposure assessment before commenting on potential health impacts.

## Noise

Environmental noise can have adverse impacts on human health and well-being and trigger ongoing community complaints about annoyance and stress. The applicant should ensure compliance with all NSW Environment Protection Authority noise criteria. This includes the use of noise mitigation measures as discussed in Section 6.9 of the EIS to safeguard the closest sensitive receivers.

To protect public health, it is also prudent to take all reasonable and feasible measures to minimise public exposure to industrial-related noise.

## Legionella

Any Cooling Towers must comply with the requirements of the *Public Health Act 2010* and *Public Health Regulation 2012*. NSW Health recommends that the system should be managed in accordance with the NSW Health Guidelines Legionella Control in Cooling Water Systems 2018. They must be installed and maintained to prevent the growth of *Legionella*.

It is recommended that if not conducted already, that the proponent seeks additional specialist advice in relation to ensuring robust community engagement and consultation processes.

If you require any further information please telephone Cindy Gliddon, Environmental Health Officer on 4924 6477

Yours sincerely



Dr David Durrheim  
**Director - Health Protection**  
**Hunter New England Population Health**