

21 November 2016

Mr Thomas Watt Environmental Planning Officer Department of Planning & Environment GPO Box 39 SYDNEY NSW 2001

Dear Mr Watt

Martin's Creek Quarry Project (SSD 14_6612)

I refer to the Environmental Impact Statement (EIS) exhibited on the NSW Department of Planning & Infrastructure web site in relation to the Martin's Creek Quarry Project (SSD 14_6612). Martin's Creek Quarry proposes the extraction of up to 1.5 million tonne of Andesite rock per annum up from a previous per annum average of 906,000 tonnes, expansion into a new extraction area and the consolidation of existing operations and approvals.

Hunter New England Population Health (HNEPH) has reviewed the Environmental Assessment (EA) Report and associated documentation, paying particular attention to the management of air quality, noise, soil, water and other issues which may have an impact on human health.

HNEPH notes the emphasis in the Director General's Requirements on effective and genuine community consultation with active involvement of the community in this process. There is some sensitivity in the community associated with this development proposal, thus, your community consultation should continue up to and if approved, during the ongoing operation of the development.

When assessing health risks, both incremental changes in exposure from existing background pollutant levels and the cumulative impacts of specific and existing pollutant levels should be addressed at the location of receptors. Exposure should be assessed at the location of the most affected receptors.

The following should also be considered in the approval process for this project:

Air Quality

Long and short-term exposure to $PM_{2.5}$ causes health effects including heart and lung diseases which may lead to premature death and increased hospital admissions. No threshold has been identified below which exposure to $PM_{2.5}$ is not associated with health effects. Therefore the proponent should demonstrate that the mitigation measures implemented throughout their operation of the project will result in no increase in the net $PM_{2.5}$ to the air-shed impacting on the surrounding population.

In addition it should be noted on 15 December 2015, the National Environment Protection Council (NEPC) agreed to vary the National Environment Protection (Ambient Air Quality) Measure (NEPM). The amending instrument took effect on 4 February 2016. The new standards are as follows:

Hunter New England Local Health District ABN 63 598 010 203

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Pollutant	Averaging Period	Maximum	Maximum allowable
		concentration standard	exceedances
Particles as PM ₁₀	1 day	50 μg/m ³	None
	1 year	25 μg/m ³	None
Particles as PM _{2.5}	1 day	25 μg/m ³	None
	1 year	8 μg/m ³	None

Reference: https://www.legislation.gov.au/Details/F2016C00215

Noise

Environmental noise can have negative impacts on human health and well-being and trigger ongoing community complaints about annoyance, sleep disturbance and stress. Evidence concerning the adverse health effects of environmental noise is detailed in a number of publications, for example, the *World Health Organization Night Noise Guidelines for Europe* (2009) and the *WHO Guidelines for Community Noise* (1999). To protect public health, it is prudent to take all reasonable and feasible measures to minimise public exposure to quarry and other related noise, irrespective of compliance with the relevant noise policies.

The EIS advises that the applicant proposes to operate the project including quarrying and processing operations between 0430 hrs to 2000hrs Monday to Saturday and train loading 24 hours per day, seven days per week.

The EIS review of noise monitoring data for the existing operations have highlighted concerns with excessive emissions associated with the extraction activities at the quarry floor, primary and secondary crushing operations, operational truck movements within the quarry area and rail loading. In addition noise generated by truck movements through local communities is an issue to residents. The EIS has outlined mitigation and management measures to address the impact from these noise emitters.

In respect to the above mitigation measures there are many issues that need to be continuously evaluated and managed to control noise emissions. The approval needs to demonstrate that the proposed mitigation and management measures on the existing and predicted noise impacts are satisfactory and ensure compliance with all the regulatory criteria.

Potable Water

The EIS does not address the source, retention and treatment of water to be used by the project for potable purposes. The assessment, management and monitoring of potable water needs to be addressed in a Drinking Water Management Plan and included as part of the EIS.

Surface Water

There is minimal information in the EIS on surface water associated with the proposal. The collection, retention, treatment, use and off site discharge of surface water needs to be adequately assessed. The offsite discharge and its implications on the receiving environment need to be evaluated and continuously monitored.

Groundwater

The type of operations undertaken on this site has an inherent risk to any ground water reserves in and around the site. There needs to be further assessment, management and monitoring of any ground water associated with this proposal.

Water Management and Monitoring

Any approval need to ensure that the EIS has a comprehensive Water Management Plan addressing all aspects of assessment, management and continuous monitoring of potable, surface and ground water associated with this proposal.

If you require any further information please contact Chris Williams, Environmental Health Officer on (02) 49246477

Yours Sincerely

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Dr David Durrheim Service Director Health Protection Hunter New England Population Health