

18 May 2020

Dr Mandana Mazaheri
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Dear Dr Mazaheri

AGL - NEWCASTLE POWER STATION (SSI-9837)
OLD PUNT ROAD TOMAGO - Response to Submissions

I refer to your advice inviting comment on the Response to Submissions (RTS) exhibited on the NSW Department of Planning, Industry & Environment web site in relation to the Newcastle Power Station SSI-9837). Hunter New England Population Health (HNEPH) has reviewed the RTS and makes the following comments for your consideration.

The HNE Health previous response to the EIS (11 December 2019) states that:

- (1) When taking into account the cumulative air quality impacts, the air shed appears to be at the limit for PM_{2.5} annual (at 8.1µg/m³) and while this development will add only a small increment (to 8.3µg/m³), the air shed already exceeds the PM_{2.5} maximum annual concentration standard.

And

- (2) It is noted also that the NEPC has included a reduction in long-term PM_{2.5} targets as a simplified approach for an exposure-reduction framework, bringing the annual average target to 7 µg/m³ and the 24-hour target to 20µg/m³, to be achieved by 2025."

The proponent's response to (1) above was:

'During operation, there would be minor exceedances of PM_{2.5} when compared to the NSW EPA air quality impact assessment criteria, however, this needs to be considered in the context of existing elevated background levels.'

The point of our comment in (1) above is that the background levels are already elevated, and that is an argument for not increasing inputs into the air shed with resulting negative impacts on human health. The proponent has interpreted elevated background levels as a justification for increasing levels. While minor in itself, the total air shed impact is comprised of multiple minor inputs.

The proponent's response to (2) above, is to note the current guideline level, to which they are not ensuring compliance, and does not express an intention to comply with the more stringent future pollution goals.

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We would seek the proponent's commitment to modify the proposed process to ensure that the proposal does not contribute to exceedances of current or future PM_{2.5} standards in Newcastle. A key interest in assessing the future impacts of this development, will be in whether it can meet future national goals.

If you require any further information please telephone Cindy Gliddon, Environmental Health Officer on 4924 6477 or email HNELHD-PHEnvironmentalhealth@health.nsw.gov.au

Yours sincerely,

A handwritten signature in dark ink, appearing to be 'David Durrheim', written over a light blue horizontal line.

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