

## Proposed 400% increase in air pollution limit NorthConnex

The proposal to grant a 400% increase in the limit for VOC emissions from the NorthConnex Stacks is unacceptable. No serious attempt was made either by the proponent or the regulator to justify the 400% increase. The proposal appears to have arisen from an oversight using modelling completed in 2015. The proponent has failed to provide data from either 2018 or 2019 and modelling results based upon such data. No explanation is offered as to why data from either 2018 or 2019 was not able to be obtained to satisfy the rigor that needs to be demonstrated to justify this proposal rather than the whim of the proponent.

The proponent has demonstrated its contempt for the residents of NSW by its failure to provide data from 2019 relating to air pollution emissions from motor vehicles and analyse options to reduce air pollution from the stacks thus averting any need to obtain a higher stack emission limit. The stack emission modelling used by RMS was made based upon around 10-year old data and the claim that vehicle emissions will reduce as tighter emission controls have taken place. The later claim made in 2010 is rejected as there has been no change to Federal Government emission controls and none are proposed by the current Federal Government. In the light of this, the responsibility rests with the proponent to provide current data on stack emissions and motor vehicle emissions in 2019 not rely upon outdated projections. The proponent has had 8 years to collect such data and should be required to provide current data rather than rely upon information from 10 years ago. If vehicle emissions have reduced, current emission data may show that no increase in the proposed limit is necessary. The 400% sought increase is merely to reduce business risk and has not been rigorously justified by the proponent.

The proponent has not demonstrated any changes to its operational controls which would permit the facility to operate without any change to the existing limit. It is not up to the public to suggest these operational changes. It is the responsibility of the proponent to demonstrate what changes could be made and the evidence why those changes will not deliver the sought pollution reduction to satisfy the existing limit. The failure of RMS to document operational changes and provide evidence in 2019 as to the effect of those possibilities should result in this proposal being rejected.

The proponent has not demonstrated how its proposed monitoring of stack emissions will be impacted by the existing limit for VOCs. There is no existing environment protection licence for the NorthConnex stacks. Until a licence is issued, the implications for compliance cannot be critically assessed. Any changes to the existing planning approval providing a 400% increase in a pollution limit is not justified at this time.

At the regulatory perspective, the NSW EPA has failed to introduce pollution charges on stack emissions and set those charges at a level reflective of emission control costs. Further, the regulator failed to critically examine the sought 400% increase in a pollutant with known health effects.