



Lithgow Environment Group Inc.

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Preserving the Balance of Nature

Attention: Emily Murray
Department of Planning Industry & Environment
Locked Bag 5022,
Parramatta NSW 2124.

Dear Ms Murray,

Re: Submission:

Mod 1 Lamberts North Ash Repository Upgrades Application Number MP09_0186-Mod-1

Lithgow Environment Group Inc have had a long history with EnergyAustralia's Mt Piper Power Station with participating in community stakeholder meetings since 2009, currently active representing on the EA MPPS Community Consultative Committee.

Whilst we understand the historic issues with Blackmans Flat previous mining, Delta Electricity and now Energy Australia Mt Pipers operations we see no real change in reducing the cumulative impacts or emissions in this location. In fact, it has increased with impacts and likely to increase if the current Waste to Energy Project were to be approved, as with the currently known leaching since 2017 into groundwater and into Wangcol Creek. Add to this with over 10 years of mining discharge from Western Coal Services into Wangcol creek. Noting the current remedial recommendation efforts to be place with Bore Hole 10 with concept to intercept the leaching in Wangcol Creek and pipe it back to the ash repository. This is not a long-term planning solution and believe that this is a patch on a bigger disaster waiting to happen with the well-known fragile honeycomb underground sub structure from previous mining.

Our concerns, objections and recommendations are listed below:

Concerns:

There is no real guarantee that the current proposal to intercept toxic leaching into groundwater and waterways will remove those toxic elements into the waterway.

There is no guarantee that MPAR, LNAR or LSAR will contain its leaching into the future

How and when will the plastic lining be monitored and maintained for its integrity into the future?

Why is that we pay taxes to pay to dump and not for a company to dump ash?

Why is that the legislation is not making companies have all of the ash resourced?

Why is that if MPPS went into caretaker mode and shut down that legislation does not require responsibility for total remediation given the legacy we now have with government peoples' money to clean up Kerosene Vale Ash Repository, Wallerawang repository as with all the other decommissioned or existing coal fired power stations in NSW.

Why is government considering increasing higher level of toxic emission if Waste 2 Energy project were approved adding on to existing emissions, increasing residual non-recyclable plastic, wooden and cotton product ash?

Who is watching and accountable for the daily monitoring of bores not being used in the vicinity?

Objections

Objection to existing known cumulative impacts, exposed coal and coal ash stockpiles
Objection to increasing emissions to the existing known toxic emissions
Objection to increasing non-recyclable plastic, wooden & cotton ash
Objection to the current legislation not requiring fees to dump ash residual
Objection to the current legislation not requiring all ash to be resourced
Objection to intercepting the leaching into Wangcol creek and returning it to the ash repository
Objection to increase of trucks to carry waste refuse, more emissions
Objection to the current method of maintaining dust control with residual brine and current required monitoring.

Every one of the above objections shows that we have a toxic situation that will impact on our land water and air now and into the future.

Reccomendation:

Legislate that all residual ash to be resourced and removed with no residual ash on site
Legislate that Mt Piper Power Station required to monitor *ALL* emissions 24/7 with independent monitoring station to reduce its emissions to zero
Legislate that if ash residual sits on site then large fess to apply until removed/resourced
Legislate that our waterways within the surrounding location be NorBE and meet the same background levels of the headwaters of the Coxs River.
Legislate health warning signage along any waterways within the location or downstream
Legislate transition to 100% renewables by 2025 - 2030.

Thank you for giving the opportunity to make a submission for the above project.

Your sincerely

Julie Favell
Natural Areas/Renewables Transition Liaison Officer
Lithgow Environment Group Inc.