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9/06/2021

## **Submission: MOD 1 - Lamberts North Ash Repository Upgrades**

The Hunter Community Environment Centre is a not-for-profit environmental resource centre located in Newcastle, established in 2004 to support grassroots community efforts to protect and preserve the important ecological assets of the greater Hunter Valley.

Through environmental investigation, research and publications, skill-sharing and community engagement the HCEC seeks to facilitate input from grassroots constituents towards improved social and environmental outcomes on matters that impact biodiversity in the Newcastle and greater Hunter region.

The HCEC's engagement with coal-fired power stations and associated ash dumps located in Lithgow has come about through our state-wide investigation into water pollution impacts of current coal-ash waste storage practices, part of our campaign to reduce ecosystem contamination from ash leachate, increase the safe and beneficial reuse of the approximately 200 million tonnes of ash waste dumped across NSW and see ash waste sites comprehensively remediated.

While we appreciate the Proponent is taking measures to reduce leachate impacts and mitigate environmental impacts, the methods proposed in the Modification are only partial solutions and do not demonstrate a strong enough commitment by EnergyAustralia to reducing the overall environmental impacts of their operations.

The HCEC **objects** to the Modification Proposal on the following grounds:

### **1. The site is inappropriate for ash emplacement and storage**

The highly disturbed surface and underground terrain and hydrology from numerous historical underground mine-workings surrounding and beneath the MPAR and LNAR, and its location at the top of a significant drinking water catchment servicing a large population render the site unfit for ash placement in the first instance.

The HCEC's surface water sampling in March 2020 of drainage sites from ash emplacement areas in Lithgow identified 8 heavy metal exceedances of ANZECC water quality guidelines for 95% freshwater trigger values.

These high concentrations of harmful pollutants in surface water at the top of the Upper Cox's catchment are highly concerning, and the potential afforded by increased coal-ash reuse to remove pollutants from the top of the catchment area entirely must be exploited.

## **2. The Modification takes an inappropriate approach to leachate control**

While we note that the Modification may increase the potential of ash reuse in future, the removal and safe reuse of ash must be made an immediate and top priority by EnergyAustralia for leachate issues to be comprehensively addressed and on-going risks mitigated effectively.

The use of liners to prevent leachate in only one portion of the overall ash emplacement area, after leachate has already escaped into the surrounding environment is inadequate and a commitment to cease dumping ash on a polluting site, and remove the polluting substance from a site with inherent environmental contamination risks must be made.

The effectiveness of using lining in only one section of the ash emplacement area is not addressed in the Modification Report.

The proposed storage of concentrated leachate in on-site in ponds and use of transport pipelines is cause for concern and the Modification should not be approved in the absence of a review of the detailed design for potential environmental risks including but not limited to over-flow of the ponds, whether the site can accommodate appropriately sized ponds and any other requirements specified in the EPA Environmental Guidelines for Solid Waste Landfill.

## **3. Outstanding approval for Groundwater Interception Project**

There is a total of nine project interactions with other mining, electricity generation and water treatment works cited in the Modification Report.

Notably, in absence of planning approval for the Groundwater Interception Project, and proof that this approach to leachate reduction is effective, HCEC asserts that any changes to the ash emplacement areas should not be approved, and that further detail on the interactions between the two respective ash emplacement areas, and the proposed addition of liners and how this affects the movement of leachate be investigated before approval is granted.

## **4. Existence of alternatives to ash emplacement on-site**

Economic modelling commissioned by HCEC into increased ash reuse (for the manufacture of Structural Lightweight Aggregates) at each of the five, operating coal-fired power stations in NSW indicates the City of Lithgow could benefit from approximately \$57.7 million in economic growth in the Professional, Scientific & Technical Services and Heavy & Civil Engineering Construction sectors within the Preparation and Construction phase spanning just three years.

While the use of liners, other leachate mitigation actions and the continued management of ash emplacement areas is crucial for as long as ash is present on-site, the approval for this Modification should not be granted until EnergyAustralia demonstrates a tangible commitment to preventing its pollution impacts by taking immediate and tangible steps towards the safe and beneficial reuse of ash.