



# Hunter Environment Lobby Inc.

202 High St  
East Maitland NSW 2323  
28<sup>th</sup> July 2020

## **Bayswater Power Station Upgrade - Major Projects - Department of Planning and Environment**

Hunter Environment Lobby Inc.(HEL) is a regional community-based environmental organization that has been active for well over 25 years on the issues of environmental degradation, species and habitat loss, and climate change.

We have been active around the issues involved with Power Stations and their operations here in the Hunter over the last few years, as can be seen by our submissions to the Department on 18/12/2019 on the proposal to build a new dual fuel Power Station at Tomago, as well as our submissions to two Parliamentary Inquiries on; Sustainability of Energy Supply and Resources on 15/9/2019, as well as The Remediation of Coal Ash Dumps on 11/10/2019.

These last documents are available through the Parliamentary Inquiry function of NSW Parliament.

We find the Environmental Impact Statement in its current form is incomplete and requires further information. As it currently stand the EIS is lacking key information for a consent authority to make an informed decision.

We feel that the EIS fails to describe the hydrogeology of the project area. It needs to detail groundwater flows, recharge areas and discharge areas. It also needs to define aquifers in the area that could be affected by the industrial operations and coal ash disposal practices.

As a result, the EIS fails to assess the full implications of ongoing coal ash disposal in the repository. Given that the EP&A Act has specific requirements around what an EIS should include, the Department should evaluate whether the EIS complies with the Act.

We find also that there needs to be more transparency around coal ash reuse. The EIS proposes an ambitious target for coal ash reuse, seeking to recycle 1 million tonnes of coal ash. While coal ash reuse could be a good thing, the ambitiousness of the proposed reuse rate is concerning. There is little market demand for coal ash.

Without a strong market for coal ash recycling, AGL must provide transparency regarding what will happen to coal ash in the case it cannot be reused. A thorough reuse and disposal plan will assure the community and the Department that this enormous amount of coal ash will not be dumped in abandoned mine pits. Coal ash is toxic and if not carefully disposed of can contaminate air, soil and water.

We also find that AGL should improve their proposed salt cake landfill lining. The proposed salt cake landfill is non-compliant with the EPAs minimum requirements for solid landfill.

That AGL proposes clay liners and caps in their EIS demonstrates a lack of understanding of the risks that salt poses to the integrity of a clay landfill liner and the geochemical process at play. Salt can destroy clay lining and poses massive contamination risks. The Department should require AGL to propose an alternative liner.

In conclusion, HEL feels that AGL needs to re-evaluate its EIS process and attend to the deficiencies inherent in that document. We also ask that we may submit further if more examination of the documents show up even more issues than are apparent presently.

Yours in trust,

A handwritten signature in black ink, appearing to read 'Jan Davis', is positioned above the typed name.

Jan Davis  
President Hunter Environment Lobby Inc.