

N.S.W. Environmental Protection Authority
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1 June 2022

**RE: PROTECTION OF THE ENVIRONMENT OPERATIONS (CLEAN AIR REGULATION)
PROPOSED N.S.W. CLEAN AIR REGULATION**

**OBJECTION TO SEVERAL CHANGES THAT IMPACT ON HUMAN HEALTH AND
ENVIRONMENTAL CHANGES**

To whom it may concern,

As a citizen of N.S.W., ratepayer to Central Coast Council, resident living near coal fired power stations and ash dams and a member of the Eraring (Origin) Community Consultative Committee, I object to any changes to the act that will have detrimental impacts on human health or the environment.

I personally opposed Delta Electricity exemption application along with close to two hundred other concerned residents and groups, due to the extent of emission of Nitrogen Oxide from Vales Point power station in 2021. The outcome was to allow an exemption for a further five years on emissions, which are still two and a half times that of the European Union and certainly nowhere near the recent recommendations by the World Health Organisation standards.

I doubt very much that any of the government bureaucrats proposing these changes has had too much to do with communities living near the power stations or their ash dams. In 2020 the Legislative Council Public Works Committee conducted an inquiry into the Costs for Remediation of sites containing coal ash repositories with their findings and recommendations making up Report 4 March 2021.

The bipartisan and unanimous committee commented (3.66) P32, "The committee agrees with inquiry participants that little research, if any, has been conducted on the impacts and long term consequences in relation to the health of communities residing near coal ash dams. We are disappointed with the response by the NSW EPA and NSW Health to community concerns about a potential link between the circulation of additional metals in the **AIR** and **WATERWAYS**, and **IMPACTS** on **HEALTH OUTCOMES** for the community. This response, in conjunction with the lack of research conducted to date on this matter, demonstrated a complete disregard by the government towards the health of its citizens".

It should and must be noted that all ash dams in NSW are the making of nearby, antiquated and sub world standard coal fired power station and that any changes to the regulation needs to be health based and processes to include clean air technologies.

Recommendation Number 6 of the findings of the inquiry stated... “ That NSW Health immediately undertake an epidemiological assessment of the health of residents near coal ash dams to establish the health impacts of coal ash and publish by 31 December 2022”.

The noted findings and response by the NSW Government was that “NSW Health is committed to understanding the impacts of coal ash on the health of communities. An epidemiological assessment of the health of residents near coal ash dams will not establish whether observed health outcomes are attributable to chemicals in coal ash. However, following consultation with the Coal Ash Community Alliance and allied organisations, NSW Health will propose alternative study types which are better able to address the community’s health concerns. Exposure assessment or health risk assessment studies would provide greater benefit compared to an epidemiological study”.

To this date neither epidemiological, exposure nor health risk assessments have been conducted and therefore no conclusion has been determined to whether coal ash dams or their sources being coal fired power stations severely impact the health of the NSW citizens living within a radius of a **minimum of 25 kilometres** from any coal ash dam or power station.

What has been exposed and confirmed by the Australian Institute of Health and Welfare is that the Central Coast / Hunter New England areas have over 100 new cases of cancer per annum compared to the similar populations of most of NSW (106.7 cases PA) this including and combination of the North Coast NSW, Western NSW and South Eastern NSW (excluding Sydney, Blue Mountains and Murrumbidgee) .

Other finding by the Australian Bureau of Statistics has **persons with three or more chronic health conditions** by suburb and population, indicating that the further you live from power stations and or coal ash dams the less health impacts, especially from air pollution.

The **Central Coast** being directly impacted by both **Vales Point** and **Eraring power stations** having...

- Lake Munmorah / Mannering Park having **16.9%** of their population having three or more chronic health conditions.
- Budgewoi **16.2%**
- Gosford **11.7%**
- Avoca Beach **8.0%**

Hunter New England:

- Newcastle Port **18.9%**
- Swansea **15.0%**
- Singleton **11.0%**

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Sydney:

- Malabar / La Perouse **7.9%** (Sydney Airport, oil refineries, Orica's toxic groundwater plume).
- Mosman **6.0%**
- Bankstown **5.3%** (Bankstown Airport 5th busiest airport in the world)
- Parramatta **3.5%**

South Coast: Port Kembla **13.2%** (industrial city and steelworks)

Similar findings by the ABS on chronic asthma...

Central Coast:

- Blue Haven **15.5%** of the population
- Budgewoi **15.4%**
- Woy Woy **12.8%**
- Terrigal **11.8%**

Hunter / New England:

- Bolton Point **16.6%**
- Hamilton **15.3%**
- Swansea **12.6%**

Sydney:

- Liverpool **8.8%**
- Surry Hills **6.9%**
- Parramatta / Rose Hill **5.1%**

South Coast:

- Port Kembla **13.5%**
- Kiama **9.3%**

NB:

The Central Coast's two main public hospitals (Gosford & Wyong) had **1,142** presentations of children between **0-15 years** for **acute asthma disorders** between Jan 2019- Dec 2020 inclusive. This being 95 children per month being presented to emergency.

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Doctors J. E. Vaughn, G. I. White and J. R. Phillips from the Queens Road Medical Centre (now Lake Munmorah Medical Centre) reported that incidences of asthma and recurrent Bronchitis in adults who do not smoke were 30% more than the National figures, unfortunately this was in August 1985 some 37 years ago and nothing has changed.

Mannering Park residents living under the shadow of the Vales Point Power Station had extreme cases of brain tumours in children over many years. It now has Blood Disorders rampant.

The Central Coast and particularly the Hunter New England regions are quickly reaching close to 20% of their populations having either three or more chronic health conditions or acute asthma.

Vales Point and Eraring ash dams with there combined 60 million tonnes of stored coal ash, regularly exceed licensing standards with the NSW Government Air Quality Alerts being a regular occurrence for both PM 10 and PM 2.5 fine particles leaving the site.

Being known by the NSW Government and NSW EPA, (Variation of Clean-Up Notice 1604734 Jan 2021) the Vales Point ash dam has some **61,770 cubic metres of illegally dumped (Special waste) Asbestos and some 159,200 cubic metres of General Solid Waste**, unnamed on the premises with video evidence available that during high wind periods the particles leave the dams and flow over near by residential and commercial properties, thus needing water bombing by helicopters to suppress the fine particles.

Direct distances from **Vales Point power station** to nearby local communities are as follows...

- **Mannering Park** to Summerland Point **2.71 km.**
- “ “ to Lake Munmorah **5.97 km**
- “ “ to Swansea **11.2 KM**
- “ “ To Wyong **18.61 km**

Eraring power station to Dora Creek **2.80 km**

- “ “ to Morisset **5.63 km**
- “ “ to Toronto **8.89 km**
- “ “ to Lake Munmorah **14.57 km**

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These figures and findings were presented to the **Directors of the Central Coast and Hunter New England Public Health Units and the EPA** at a meeting held on the 29th of April 2022 by members of Future Sooner, Gary Blaschke OAM, Joseph Halwagy registered Chemist and Dr. Merlene Thrift GP Cooranbong (20 years).

These findings alerted the Public Health Units of information that they were unaware of and it was proposed that these meeting should continue on a monthly basis, the next being 7th June at Morisset Hospital.

Joseph Halwagy presented indisputable evidence on Naplan results from Central Coast Schools with Lake Munmorah and Mannering Park (closest to the power station) ranking 30th from 30 schools. Once again demonstrating the further you reside from power station the great Naplan results.

The NSW Government along with politically appointed Local and Regional Planning panels plus an appointed Administrator for Central Coast Council have put forward housing proposals from 17,000 new dwellings in the North Wyong Structure Plan 2012 to now some 55,269 new dwellings in the Central Coast Regional Plan 2041, being a conservative estimated increase in population near the power stations of Vales Point and Eraring to some 138,172 new residents being put in harms way of both power stations and or ash dams.



None of these structure or regional plans has taken into consideration of the cumulative impacts on human health and welfare, especially those within a 25 km radius of coal fired power stations or ash dams, plus ongoing destruction of our fauna and flora. Each proposal is looked upon as an individual development

The latest proposal of which I addressed Central Coast Council on the matter on Tuesday 24th May, is that of a further 360 new dwellings, an over fifties village, a childcare centre, medical centre, motel, food outlets and outdoor recreational facilities at the Doyalson Wyee RSL Club which happens to be sandwiched by two ash dams.

The Vales Point ash dam is over fifty years old and unlined, having many Government Air Quality Alerts for fine particles leaving the site with 30 Million tonnes of stored coal ash with illegally dumped asbestos and unknown general waste included, just across the road from this proposed housing and commercial development.



At the rear of the proposed site is the forgotten Lake Munmorah ash dam with no documentation of quantities stored or complexities of heavy metals contained. The Central Coast Administrator Rik Hart has indicated in correspondence with me that the EPL over the Vales Point ash dam site, combined with improved monitoring, transparency and potential coal ash re-use opportunities, are considered adequate to manage potential environmental impacts.

Firstly Mr. Hart is not an expert in this field nor me, yet I have been on the Eraring Community Consultative Committee and a founding member of the Coal Ash Community Alliance Inc. for close to three years with a background involved with the Orica ground water toxic plume of Ethylene dichloride at Botany.

Mr. Hart's assumptions that the Environmental Protection Licence covering the Vales Point site along with its improved monitoring and transparency, is simply incorrect by all statistical and medical evidence available. The potential for coal ash re-use opportunities to the extent needed to remove the issue is far from being solved in any manner, whether it is with concrete for roads, pre-cast building materials or other possibilities.

I find it confusing that further correspondence from the former Central Coast Administrator (former employer of Rik Hart) Mr. Dick Persson AM acknowledged the contribution the community had made to the Legislative Council Inquiry and had written to the NSW Minister for Energy and Environment, the Hon Matthew Kean MP, David Harris MP, Yasmin Catley MP, Emma McBride MP and David Meham MP, seeking their support in acknowledging the inquiry and implementing the sixteen recommendations made in the Legislative Council Report dated 4 March 2021. To date I have not seen any reply or information of their support.

The mounting Federal Government statistical information and increasing unsolved medical findings through Legislative Council inquiries, University Cancer Cluster reports, Public Health Units, doctors and scientists and the total ignorance to these findings by NSW Planning, Regional and Local Planning Panels and in my case an ill-informed Central Coast Council Administrator and those putting forward this NSW Clean Air Regulation amounts to possible neglect of the health and welfare of those living within the 25 km radius of coal fired power stations and their ash dams.

It could and most probably will be argued that any decision allowing any changes to legislation without conducting recommended studies on health by both the Legislative Council Public Works Committee and two regional Public Health Units, to be totally irresponsible and possibly legally liable for the ongoing health of the 63,816 existing and potential 138,172 new residents to the northern part of the Central Coast and lower Lake Macquarie regions.



650 children currently suffering from chronic asthma in the region.
(Doctors for the environment)

The proposal needs to recognise and include the following...

- That the emission concentration standards have not changed along with the regional development since 1997.
- The acknowledgement of the increased general population since 1997 including the disabled and elderly (Central Coast has the third largest population of those over 65 years in NSW) and future housing proposals under the Central Coast Regional Plan 2041.
- **The proposal is no longer health based.**
- The phrasing of more stringent emissions is far too late.
- The lack of EPA consultation with the community to any changes, allowing only four weeks with most of the general community unaware.
- That new technologies exist and are not being required by the EPA, such as Fabric Filter Bags, Low Nitrogen Burners and other means that are well recognised to reduce human impact.
- That the NSW Government nor the industry themselves have investigated in the re-use of coal ash which is part of the air quality issue for the regions around power stations.



Coal ash dust over vehicle on Pacific Highway Doyalson



What is required by the community for all power stations and industries is...

- Independent Health Impact Assessments.
- Regional Air Quality Assessments.
- The removal of the capacity of industry to apply for exemptions for the phasing out to lower emissions.
- NO further licences to pollute.

I am happy to talk further on any of the above issues if needed...

Yours sincerely,

Gary Blaschke

Gary Blaschke OAM



