

Fri 3/06/2022 2:57 PM

[BULK] Take the Survey Form Submission

There has been a submission of the form Take the Survey through your NSW Environment Protection Authority website.

**Name**

Dr Haydn Washington

**Organisation or business name**

individual

**Position (job title)**

environmental scientist

**email address**

[REDACTED]

**Which stakeholder group best describes you?**

Consultant/academic

**Do you support extending the summer petrol volatility period from 15 November - 15 March to 1 November - 31 March?**

neither support or oppose

**Do you support requiring older operations at EPA licensed industrial premises to meet the more stringent emission standards that apply to newer activities and plant?**

strongly support

**Comments**

Older operations must meet the updated and more stringent emission standards so as to protect the environment properly.

**Do you support the transition period (by 2025 to 2030) for these older activities and plant to meet more stringent emission limits?**

strongly oppose

### **Comments**

transition period far too long, they should transition in no more than a year so as to minimise the pollution that should never have been allowed in the first place!

**Do you support expanding the geographic area in which controls apply for the storage and transfer of volatile organic liquids to include the greater Newcastle and Wollongong metropolitan areas, so they are included in the area that requires petrol vapours to be captured during transfer of petrol between underground storage tanks and road tankers (the stage one zone in the Clean Air Regulation)?**

strongly support

**Do you support the proposed new tightened emission limits and control requirements for all volatile organic liquid storage tanks, loading plant and tank vehicles regardless of age?**

strongly support

**Do you have any comments on the timing of the transition period for meeting the proposed new requirements: • 2024 to 2027 for new storage tanks, loading plant and tank vehicles, and • the next major maintenance or 2027 to 2030 for existing storage tanks, loading plant and tank vehicles?**

The transition periods are too long, these things need to be fixed quickly.

**Do you have any other comments on the remake of the Clean Air Regulation?**

There is clear evidence based data that shows significantly high multiple complex comorbidity rates; significantly high head & neck/lung/kidney/colorectal cancer rates; and significantly lower NAPLAN achievement in local communities

affected by air-borne pollution from Group 2 industries such as Vales Point Coal Power Station.

I note that in January this year the EPA granted Vales Point Power Station exemption to extend the period of time the power station remains within Group 2 to at least 2025.

I am concerned to read section 44 (1) Phasing out of Groups 1–4 of the Draft Regulation proposing “An activity or plant belonging to Group 1 or Group 2 on the commencement of this Regulation remains in the Group if the licence for the activity or plant continues to include a legacy condition stating the activity or plant is taken to belong to the Group”

I am also concerned to note this Draft Protection of the Environment Operations (Clean Air) Regulation 2022 makes no reference to the ongoing toxic air-borne pollution from the millions of tons coal ash dams in open unlined dams generated by and deposited around Group 2 industries such as Vales Point, Eraring, and Munmorah Power stations.

Clearly the Draft Protection of the Environment Operations (Clean Air) Regulation 2022 lacks any cognisance and reference to NSW Government Response Inquiry into costs for remediation of sites containing coal ash repositories

(<https://www.parliament.nsw.gov.au/tp/files/80392/NSW%20Government%20response%20Inquiry%20into%20costs%20for%20remediation%20of%20sites%20containing%20coal%20ash.pdf>); and to the NSW Legislative Council Public

Works Committee Report 4 March 2021

(<https://www.parliament.nsw.gov.au/tp/files/79377/Final%20Report%20-%20Costs%20for%20remediation%20of%20sites%20containing%20coal%20ash%20repositories%20-%202022%20March%202021.pdf>)

The evidence-based data available demonstrate that continued emission and pollution rates with standards in place for decades for Group 2 industries will continue to cause unnecessary generational community suffering dealing with

significant health burden than the general population. This lack of social justice is even more extreme for children in the developing years, the sick and elderly residing in close proximity to these Group 2 industries.

**What do you think are the most important sources of air pollution to address in Sydney?**

vehicle emissions

**What do you think are the most important sources of air pollution to address in Newcastle?**

coal fired power stations and coal loader

**What do you think are the most important sources of air pollution to address in Wollongong?**

coal industry and smelter

**What do you think are the most important sources of air pollution to address in the Greater Metropolitan Region?**

vehicle emissions