

Hunter Community Environment Centre.



27/11/2019

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With this final opportunity to comment on the Eraring Power Station Ash Dam Expansion MOD 1, the HCEC wishes to reiterate the points made in our initial objection to the project¹.

1. **Coal ash reuse targets have not been met**, with the barriers to increased reuse remaining un-addressed, meaning subsequent expansions to the Eraring dam may be needed as soon as 2024.
2. **The EIS lacks critical detail about ash waste volume or risks of catastrophic failure**, with detailed risk mitigation plans to address Subsidence and Surface Water Interconnectivity hazards, identified by SCT Operations absent. Updated ash flow paths and disaster mitigation response plans are similarly absent.
3. **The EIS does not set out the elements or toxicity of the coal ash**
Limited mention of heavy metal concentrations in ash are made in the EIS, however in the event of ash dam failure, severe contamination of Lake Macquarie with heavy metal laden coal-ash may occur, devastating local ecological populations including native birds and fish, and jeopardising the ability for recreational interaction with the Lake.
4. **The ash dump will be allowed to continue to contaminate Lake Macquarie and coastal wetlands**
5. **The ash dump will be allowed to continue to pollute groundwater**
6. **The ash dump will continue to cause air pollution**

Detailed information about water pollution stemming from the Eraring ash dam can be found in the HCEC's report released in Feb 2019, *Out of the Ashes: Water pollution and Lake Macquarie's aging coal-fired power stations*².

Attached to this submission are the key recommendations of this report, aimed at reducing water pollution through amendments to EPLs and outlining coal-ash reuse possibilities and barriers.

¹ http://hcec.org.au/sites/default/files/files/hcec_eraring_power_station_-_ash_dam_expansion_mod_1_submission.pdf

² <https://drive.google.com/file/d/1-3qbaitKC1r17vFdkAQ8JQFsx22ybIL/view>

Proposed mining under the ash dam

In addition, the HCEC would like to draw the Commission's attention to the fact that the EIS does not make any mention of the proposed under-mining of the Eraring ash dam by Cenntenial Coal, with geotechnical information about the potential risks of this activity entirely absent.

The proposal for further mining by Cenntenial emerged after the Eraring expansion EIS was completed and the public submission period closed, however considering that the EIS does consider the risks associated with the existing Awaba mine workings, including Subsidence and Surface water interconnectivity hazards:

1. Has the Commission considered how the proposed mining by Cenntenial and the ash dam expansion interact, or sought information about possible subsidence and other risks generated by further mining and additional ash waste deposition?
2. Has the proponent made assurances or addressed the Commission regarding geotechnical aspects of future mining activity and risk-mitigation, in light of the expansion proposal?
3. And, have assurances by the proponent been verified by independent experts, engineers or environmental consultants?

Public meeting and transparency

Finally, the HCEC would like to request that the Commission reconsider its decision not hold a public meeting regarding this proposal, due to the drastic increase in community awareness and concern about ash waste dams, caused by the sudden closure of the Myuna Bay Sport and Recreation Centre in March 2019.

The issues and risks outlined in a technical report issued by Origin Energy which triggered the closure of Myuna Bay Rec. Centre, and a subsequent review of the report³ which substantiated the decision made by the Office of Sport as reasonable, are matters of public interest and alongside the public outrage at losing a beloved community asset, there is now an elevated degree of awareness and concern among the local community about the environmental and safety hazards of Erarings ash waste dam.

We would like the Commission to acknowledge that the official submission period for the proposed Eraring expansion ended *prior* to the announcement that Myuna Bay Rec. Centre was to be closed, thus the level and diversity of community concerns about the Eraring ash dam site was not captured by the submission process.

We note the Commission opted to conduct a site tour with community stakeholders and the extended opportunity to make comment, however there are firm grounds for a public meeting to be called and we urge the Commission to do so.

The HCEC believes an opportunity for community stakeholders to pose questions, raise concerns and attain information from direct sources during a public meeting about the Eraring ash dam, its management, expansion and the measures being taken by Origin Energy, the Department of Planning, EPA and any other relevant bodies to mitigate current and future impacts and risks to the

³ <https://www.newcastleherald.com.au/story/6302877/further-analysis-required-to-determine-risk-to-myuna-bay/>

surrounding area and environment, will be of immense value to increasing understanding and fostering transparency for a concerned public.

Summary

- The water pollution issues being caused by the Eraring ash dam will be exacerbated by the expansion, contributing to an ash storage and management regime already causing unsafe levels of heavy metals to accumulate in Lake Macquarie's aquatic organisms
- While some risks of the expansion have been identified by Origin and consultants, risk mitigation plans and strategies have not been explored in any depth, and their viability remains unknown by the public, and seemingly Origin Energy. More detail is needed for the public and community to be assured the expansion can be carried out safely.
- The risks of future mining operations proposed by Centennial Coal in relation to the expansion have not been addressed at all by the EIS or Origin Energy.
- With the special circumstances surrounding this proposal, including the loss of the Myuna Bay Recreation Centre, and the drastic increase in community concern about ash waste management and the Eraring Power Station Ash Dam Expansion, we are calling for a public meeting to be held so that affected and invested local stakeholders can see concerns addressed directly by Origin Energy and the Commission