September 2020

**Submission to Russell Vale Underground Expansion Project - Oppose**

As a home owner at 20 West Street Russell Vale which is located approximately 200 metres from the mine I am shocked at the New South Wale’s Department of Planning’s decision to approve the proposed expansion for further consideration by the IPC.

The Department appears to be interested only in the “cost-benefit analysis” which as any economist will tell you (one that isn’t being paid by the proponent) cannot capture all of the costs and in this case is too reliant on the proponent’s opinion of the impact on residents of costs such as air and noise pollution, reduced amenity and danger.

This mine is too close to a residential area to be in keeping with a modern city such as Wollongong which relies on its amenity to attract talented people and businesses to the area.

I do not accept the comment that because this is an existing mine that expanding it is a reasonable decision. Fair enough, 100 years ago when the population was sparse and our knowledge of the impact of coal mining on health and the environment was in its infancy, but not today.

Because it is so close to homes, there is no way that this mine cannot present a danger. The dust produced will fall on our homes and into the air we breathe and the trucks are a constant threat to our children’s safety.

Responsibility for our safety seems to rest entirely with the company which itself has an extremely poor history of compliance. They have not removed the waste pile as directed by Council, and do not seem interested in complying with Australian standards and rules.

There is no doubt there will be a significant increase in dust from the mine expansion.

Resident’s testify to the layers of fine black dust already found in our roofs and on our decks.

We are renovating at the moment and my builder said our roof cavity is black with coal dust. When the mine was (partially) removing the stockpile of waste coal the increase in dust resulted in our kids’ feet being black. The dust is very fine and easily inhaled into the lungs. My kids get blocked noses whenever the wind blows from the direction of the mine.

Since the removal of the waste pile has stopped, we have noticed a reduction in coal dust.

I not understand how the mine (and not the Government – EPA) can be solely responsible for monitoring dust. There is a collection point on the fence we share with our neighbour which is rarely checked. I cannot recall when it was last checked and we would notice since we are at home most of the time. The dust levels shown on the mine’s website do not agree either with what we observe in windy and dry conditions.

Let’s assume that dust levels are a health risk and as a result of 20 years exposure my kids get lung disease. Who is held responsible? Is it the mine? This mine will not exist then. Is it the planning authority or government that approved the project?

Who checks on the mine to see if they are using sprinklers in dry and windy weather (they don’t) and what happens if they are not? Our house is well within reach of the dust coming from the still huge stockpile. If the mine re-opens then processing and movement of coal and a new stockpile has to increase dust and by a lot. How is it possible to predict what this increase will be and whether it will be “generally acceptable”?

As well as our lived experience of coal dust, we also saw how the mine reneged on its obligation to remove the waste pile which to date has been the main cause of dust. The neighbourhood predicted this would be the case. On day one of the scheduled removal, many trucks lined up, but by the second week there was only one or two trucks making the trip and then no more trucks.

The Council ordered WCL to remove the whole stockpile, but they only removed a portion. It is still clearly visible from Broker Street and we have received zero explanation from the mine as to whether the pile will be removed.

The proximity of this mine to our home together with their failure to do the right thing are the main reasons why we so strongly against re-opening this mine.

Expanding the mine will result in more mess, more buildings to demolish, a larger hole to fill, and more environmental degradation. To give this company the green light is like giving a kid who draws on internal walls a packet of permanent markers and it would be brave parent to say don’t worry, this kid is going to clean up its own mess.

**Extract from Department report concerning dust**

WCL has committed to implementing a range of best practice air quality mitigation measures including:

- full enclosure of the new coal processing plant and all conveyors and material transfer points;

- operation of water sprays and use of water carts on unsealed haul routes;

- washing and covering of all trucks before leaving the site;

- use of veneer coating on long term unworked stockpiles (>30 days) and unsealed haul routes;

- revegetation/rehabilitation of exposed disturbed areas; and

- proactive and reactive dust control measures, including continuing to operate the existing real-timemonitoring system and modifying or suspending activities, if necessary, to minimise dust impacts.

• The Department notes that historical operations at the colliery have generally complied with applicable air quality criteria and considers the proposed air quality mitigation measures represent current best management practice.

• An assessment of the worst-case operating scenario, involving maximum daily ROM throughput and product transfer coinciding with worst case meteorological dispersion conditions, was undertaken at the request of the EPA. This assessment predicted that the PM2.5 criterion would not be exceeded under worst-case conditions, **however there are predicted to be exceedances of the 24-hour average PM10 criterion at three receptor locations to the north, when combined with the 95th percentile measured value for background.**

• ERM notes that the worst-case scenario is highly conservative and that it is unlikely that the maximum production levels would coincide with worst case dispersion conditions in practice.

• WCL has installed additional air deposited dust monitoring stations around the site, including 3 located in local schools, and two Tapered Element Oscillating Microbalance instruments (TEOMs) capable of recording total suspended particulates (TSPs), PM10 and PM2.5 emissions have been installed at the boundaries of the site, along with an automated weather station. This system allows the colliery operators to continuously monitor weather conditions and dust dispersion levels, and to modifying or suspending activities, if necessary, to minimise dust impacts.

• In its Second Review Report, the Commission indicated that an effective real-time monitoring and proactive management regime is of critical importance to minimise potential air quality impact on residents.

The Department agrees and has recommended a condition requiring the existing air quality network, including real-time system, continue to operate during all stages of the Revised UEP.

• The Department agrees that the predicted air quality impacts associated with the project are generally acceptable, and that the risks of adverse impacts are low and can be adequately managed through the implementation of best practice mitigation, monitoring and management measures. The Department has recommended conditions requiring WCL to:

- comply with contemporary air quality criteria;

- implement all reasonable and feasible ‘source-based’ measures to minimise dust emissions on site;

- continue to implement a real-time dust monitoring program and an active air quality management system to identify and manage potential exceedances; and

- develop a comprehensive Air Quality and Greenhouse Gas Management Plan.