

**Hunter New England Local Health District  
Hunter New England Population Health**

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**Health**

Hunter New England  
Local Health District

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Ms Genevieve Seed  
Senior Planning Officer  
Resource Assessments | Planning Services  
NSW Department of Planning and Environment.  
320 Pitt Street | GPO Box 39 | Sydney NSW 2001

Dear Genevieve

Re: RIX'S CREEK COAL MINE CONTINUATION OF MINING PROJECT SSD 6300 - RESPONSE TO REVISED RESPONSE TO SUBMISSIONS

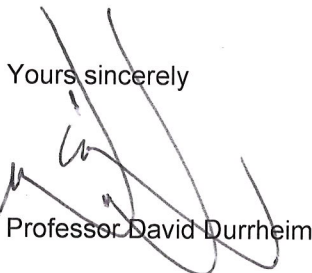
We understand that the Independent Planning Commission have sought further clarification as to whether NSW Health's concerns with regard to air quality have been addressed in the proponent's response to submissions and revised response to submissions.

Further review of Appendix H has revealed that the new NEPM air standard for annual average PM10 of 25  $\mu\text{g}/\text{m}^3$  is not predicted to be exceeded in the residential areas immediately north of Singleton are but at least one residence is predicted to reach 25  $\mu\text{g}/\text{m}^3$  and many other residences will be in the vicinity of the goal due to incremental emissions from Rix's Creek and existing air pollution from surrounding mines. Many private residences that are not in the acquisition zones within McDougall Hill and Singleton Heights will have significantly increased predicted daily PM10 impacts from the mine – many with an incremental average 24 hour PM10 impact of 20 to 30  $\mu\text{g}/\text{m}^3$  (Appendix H, Table 3). The cumulative impact at the Country Acres Caravan Park is predicted to exceed the NEPM average 24 hour PM10 goal of 50  $\mu\text{g}/\text{m}^3$  (Appendix H, Table 6, Figure 3 and 4 - noting that the tolerance of 5 days of exceedance of the goal per annum has been removed from the revised NEPM). There are also incremental impacts in mine owned residences and residences subject to acquisition.

While the EIS focuses on assessment criteria we note that there is no evidence of a threshold below which exposure to particulate matter (PM) is not associated with health effects. Therefore, it is important that all reasonable and feasible measures are taken to minimise human exposure to PM.

On review of the revised response to submissions we note that multiple residential areas will experience increased PM10 impacts. If the project is approved it will be important to consider the need for mitigation of impacts beyond traditional acquisition zones, the impact on residential expansion surrounding the mine and targeted interventions such as those promoted through the Dust Stop Program.

Yours sincerely



Professor David Durrheim

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