

# PORT KEMBLA POLLUTION MEETING

C/- 203 Wentworth Street, Port Kembla NSW 2505  
Telephone: (02) 4276 2715  
Email: pkpm@optusnet.com.au

**LBLReview**  
**Regulatory Reform and Advice Branch**  
**Environmental Protection Authority**  
**PO Box A290**  
**Sydney South NSW 1232**

[LBL.Review@epa.nsw.gov.au](mailto:LBL.Review@epa.nsw.gov.au)

Thursday 16<sup>th</sup> December

Dear Sir,

Thank you for the opportunity to comment on the proposed review of the Load-based Licensing Scheme. We acknowledge the wonderful work that the EPA has done and is still doing to protect us from reckless exploitation by heavy industry. We realise that load-based licensing is one of the tools at your disposal to achieve the aim we all want, which is a system of manufacturing and industrial development that is environmentally sustainable and is fair and equitable to all citizens.

We have several comments:

1. There should be spot checks by the EPA to ensure that industries are accurately evaluating their emissions for LBL purposes. Environmental Impact Statements (EIS) produced by those preparing DAs are based on estimations which later need to be confirmed. When a Council is the Approval Authority there is still need for the EPA to confirm the accuracy of the estimations.
2. We support the weighting system in the LBL and consider it would be a worthwhile plan to regularly review the weightings according to the reduction attitudes of the industries. If the industry finds the paying of the LBL is cheaper than improvement, the cost should be increased to encourage compliance with best practice.
3. Page 20 states “about 90% of human health costs from air pollution are due to particulates”. We consider that particulates should be differentiated into PM 2.5-10 and PM2.5. Furthermore the fine PM2.5 should be considerably higher weighted than they are

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Providing an open forum for local community, industry and relevant government agencies to work co-operatively reducing levels of pollution that impact on the health and comfort of the community.

because of the health impact and the widespread affect. PM 2.5 and smaller have the greatest impact because they go deeper into the lungs.

4. The working of open stockpiles should attract and extra LBL fee.
5. We support the introduction of “Cumulative Impacts” but need to have more information about limits and other details. Cumulative Impact should be mandated to be addressed at the Development Application stage on new and upgraded developments. Cumulative Impacts are essential for industrial areas like Port Kembla. Is the Port Kembla airshed weighted in the Critical Zone? If not why not.
6. It is wise to measure pollution in the air for LBL purposes but we suggest measuring oxygen and ozone levels as well. Regular monitoring of oxygen may be beneficial to the community during the thunderstorm period. LBL could not be applied but it would be a good opportunity to know the quality of the air. Some people in our group suspect that the impact on residents in the recent Melbourne Thunderstorms may have been made worse by ozone depleting the oxygen at ground level. Lightning can cause a chemical reaction that changes oxygen into ozone. That is the smell after a thunderstorm.
7. Residents have complained to us about the difficulty in reporting pollution incidents to the EPA. It might be useful to educate the general public about how to report details of pollution incidents to the EPA - something like The Tosser Campaign which seems to be successful.

Yours Sincerely,  
Olive Rodwell

For and on behalf of the PKPM