Yatala Residents Alliance
A COMMUNITY VOICE
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"A Community voice surrounding topics which impact the lifestyle, health & environment of residents near commercial & industrial developments in the Yatala Enterprise Area"

The Honourable Dr Steven Miles MP
Minister for Environment and Heritage Protection and Minister for National Parks and the Great Barrier Reef
GPO Box 2454
Brisbane
Queensland 4001

17 July 2017

Emails:
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Dear Minister Miles
CC Mr Jonathan Black

Re: Ormeau/Yatala air quality investigation

We refer to your letter CTS04796/15 dated 27 April 2015 in which you advised that monitoring for dust, crystalline silica and asbestos, would occur between June and October 2015. You also advised that monitoring would be conducted for bio-aerosol concentrations at the source and downwind locations in order to determine the potential risk to sensitive receptors.

We advise that an advance "Ormeau/Yatala air Quality investigation" report was emailed and posted to the stakeholders on the 11th of May 2017 and after some delays while we were waiting for DSITI to post the report online, the report and related excel spreadsheets containing hourly records of dust levels were finally emailed to some 382 residents/YRA members. Despite several past communications with your office and Mr Black Director General of the DEHP, we note that there is absolutely no reference in the report about any **bio-aerosol investigation.**

Please refer to the following link which is a similar investigation to what we have been requesting, the investigation dated 2015 was carried out at 2 composting facilities in Swanbank Ipswich Queensland.
Link https://eprints.qut.edu.au/83087/4/Carol_Fewkes_Thesis.pdf

Within chapter 6 of that investigation ***"Conclusions"*** *you will note on page 108 under "**Residential and occupational health risk"** Concentrations of bio-aerosols frequently found above TLV's (threshold limit values) at distances >0.5km up to 2km(or potentially greater)from composting facilities may be typical. Therefore, bio-aerosols from industrial green waste composting facilities should be considered as a potential health risk to surrounding communities.*

On page 109 under "General recommendations"

- *A buffer zone/or separation distance of approximately 2km from industrial green waste composting facilities for residential or sensitive commercial (e.g. food processing, health care)*

Dr Miles there are several hundred homes within a 2km radius of the composting and mulching operations in the Yatala/Ormeau area (a quick google earth aerial view will show that some homes are as close as 100 metres), therefore please ensure that the bio-aerosol investigation (that YRA has asked for some 2 years ago) is promptly completed along the lines of the investigation in the above link.

After the first reading of the "Ormeau/Yatala air quality investigation" it appeared that all dust levels recorded were well within the standards. Although welcome news we were rather surprised that the dust level which was photographed at Vennor Drive on the 6th of July 2016 appeared to be deemed as acceptable.

Remembering that hourly excel spreadsheet dust levels were available for reference from the monitoring sites we looked them up and found that no record existed for the Ormeau monitoring station until the 7th of July 2016, 2 days (**refer page 10 of air investigation**) after that event and the record available **was only for PM10** and **not** for PM2.5 or TSP levels. This appeared strange as the introductory letter advises that monitoring took place between September 2015 and November 2016.

We then decided to take a closer look at all the information presented and have come up with the following observations and questions:

The introductory letter advised that *Quarry activities are deemed to be an ERA, with each site required to hold an Environmental Authority (EA), which contains conditions for lawful operation. Each of these EA's lists specific limits for air emissions*. We also referred to the Australian Government air quality standards Link http://www.environment.gov.au/protection/air-quality/air-quality-standards and noted that under the NEPM (National Environment Protection Measure for Ambient Air Quality) that the NEPM sets national standards for the 6 key air pollutants to which most Australians are exposed, carbon monoxide, ozone, sulphur dioxide, nitrogen dioxide, lead and particles. Under the AIR NEPM, all Australians have the same level of air quality protection. (More on this later).

We note that Maximum levels for Particles as:

PM10 are 50 ug/m3 one day average
PM10 are 25 ug/m3 one year average ---→ as per page 3 of the air quality investigation report.
PM2.5 are 25 ug/m3 one day average
PM2.5 are 8 ug/m3 one year average

Based on this information we viewed several Quarry permits which DEHP had supplied to one of our resident members and were most surprised at how much these permits varied in their specific limits for air emissions, particularly as most of these permits were issued within the last couple of years. For example:

- One permit stated a dust deposition rate of 120 milligrams per cubic metre OR PM10 suspended in the atmosphere of 50ug/m3 over a 24hour averaging time must not be exceeded at any nuisance sensitive or commercial place. We note the absence of a limit for PM2.5 particles!
- Another permit stated dust deposition rate of 120 milligrams per cubic metre OR PM10 suspended in the atmosphere of 150ug/m3 over a 24hour averaging time must not be exceeded at any nuisance sensitive or commercial place. We again note the absence of a limit for PM2.5 particles! And is it legal to issue a permit for 150ug/m3 when the national limit is 50ug/m3??
- Yet another permit just "states "odours or airborne contaminants which are noxious or offensive or otherwise unreasonably disruptive to public amenity or safety must not cause nuisance to any sensitive place or commercial place". How do you quantify "unreasonably" or "nuisance" and how do you police these definitions? Wouldn't it have been much simpler to use the correct national standard for PM10 and PM2.5 particulate emissions?

There are 8 permits in all, permit numbers are as follows and each has one of the above conditions for air emissions. Permit number EPPR00563913, EPPR00575213, EPPR00845313, EPPR00984013, EPPR01766213, EPPR00810613, EPPR00841213, EPPR02000314.

Dr Miles could you please advise if you consider these quarry permits acceptable and could you also please advise if this would be acceptable to yourself if you were the owner of the nearest sensitive neighbouring property.

SELECTION OF MONITORING SITES AND MONITORING EQUIPMENT

We noted on page 8 of the report that monitoring equipment was situated at a property in Luscombe approximately 1.5km north of the nearest quarry. On pages 13-14 we noted that the second monitoring site was in Vennor Drive Ormeau which is on a ridge overlooking a quarry approximately 500 metres away. Throughout the report we get the distinct impression that it is recognised that the Ormeau site is the most susceptible to dust events so we find it rather strange that the best equipment (**in our opinion the TEOM analyser which produces the hourly dust reports on excel**) was only used in Harts Road Luscombe, we also note that priority was given to Luscombe in regard to a monitor which was able to record hourly events i.e. Luscombe started 2 September 2015 and went for 8 Months on PM2.5 data and TSP data(somewhat short of a year which would have provided a much clearer picture) and over 1 year with PM10 data, whereas Ormeau started some 10 months(July) later and only provided some 4 months of hourly data for PM10 only.

We also believe that the Ormeau site experiences the highest dust levels when there are westerlies and south westerly winds, these winds are generally experienced well before July, so it is unfortunate that a full Year of PM10, PM2.5 and TSP hourly data was not collected at Ormeau.

We also do not agree with the last paragraph on page 1 of the report i.e. that the monitoring was conducted at residential sites likely to experience the highest impacts from quarrying activities based on proximity, as 1.5km is not the nearest residence to quarries in Luscombe. One of our YRA members has resided in the area for some 30 years and is probably half that distance or less from quarries, additionally they are located between 2 quarries and are in the unenviable position of getting a dose of dust whether the wind direction is from the south east or the south west. They advised us that they were never approached by DEHP or DSITI in regard to having a dust monitor placed on their property.

On page 8 of the report under the heading of "**Meteorology"** it is mentioned that "*During the monitoring period there were also extensive earthworks associated with the development of an industrial estate taking place approximately 1.5kilometres from Harts Road"* and that potential existed for dust from those earthworks to impact at the monitoring site. Please note YRA requested air monitoring not only for quarry dust but for cumulative dust, we suspect that residents in the vicinity of Stanmore Road between Enkleman Road and Paterson Road have been and are being subjected to not only dust from the quarries but also dust from the multiple sites currently being cleared for industrial development. Why did DEHP or DSITI not consider placing a dust monitor in that area considering that all Australians are entitled to PM2.5 and PM10 emissions complying with NEPM national standards?

We can appreciate that the report is difficult to read in regard to what monitoring equipment was used where and when, so we produced a simplified chart as **per the attachment titled "Air investigation timing chart 9 July 2017"**. This was done more for the benefit of our members but may also be useful to yourself as it may give you a clearer picture as to why we are so sceptical about portions of the report.

Deposited dust monitoring

The deposited dust monitoring as shown on pages 6, 16 &17 is basically a funnel in a bottle collecting dust over a month period, that dust as very clearly described in page 6 is then processed to establish the proportion of a nearby quarries contribution of what is deemed to be nuisance dust in the particular area where that bottle is located (*as we understand it, this should preferably be at the premises of the nearest sensitive receptors/ residential homes or businesses*). This method in our opinion is unable to identify the days or hours within a month when dust levels may have been unbearable to persons living nearby nor does it OR for that matter should it identify the cumulative dust levels from other quarries and other dust sources such as earthworks at large industrial sites and some industry.

The results presented for the 2 chosen monitoring sites are not indicative of the total/cumulative dust which may have been higher in certain residential parts of Ormeau and Yatala (*why were there no deposited dust levels conducted there?)*. Additionally the Luscombe site which is 1.5km from the nearest quarry is **NOT** the nearest sensitive receptor as there are homes which are considerably closer.

General observation about the air quality investigation report

This report was made available to all our 382 members for their information and opportunity to offer any comments, understandably because of its technical nature and complexity we have had a low response from only 10 members, 9 of whom were very supportive of the YRA committees' efforts but most were confused and suspicious of the reference to average dust levels whether daily or yearly average. One member was not supportive and felt that YRA should be doing more, we found this to be rather surprising as we had not issued any public comment on our view or any other members views on the report.

The best way that we can think of describing PM2.5 and PM10 particulate matter is by suggesting our residents google PM2.5 particulate matter and reading about it on Wikipedia or many other sites, it can then be realised that it is because of it's potential to harm human health and even plant health that Australia's first National ambient air quality standards included Particles as PM2.5 and Particles as PM10 amongst the other 5 key pollutants. Refer link as follows: http://www.environment.gov.au/protection/air-quality/air-quality-standards

We note on page 2 of the above link that there is nothing sinister about the averaging period in fact as we understand it, it would have been established based on advice from the medical community to minimise health impacts from both long term and short term impacts i.e. levels of PM2.5 have a limit of 25 micro grams per cubic metre averaged over one day, BUT this level is reduced considerably to a level of 8 micrograms per cubic metre averaged over one year. In other words it is considered that an exposure to dust levels of up to 25ug/m3 over one day is not considered harmful but if this same exposure continued over 365 days then that would result in a yearly average of 25ug/m3 which would be 17ug/m3 over the 8ug/m3 yearly limit and would be considered very harmful.

More information about averaging is available at www.envirojustice.org.au refer link as follows: https://envirojustice.org.au/sites/default/files/files/Submissions%20and%20reports/Envirojustice_air_pollution_report_final.pdf

Page 26 paragraph 3 from the document in the above link gives an example of the limitations of averaging **while all the information within that link has spurred us to go the extra effort of carefully reading the air quality report for our area**.

We prepared the following table on page 6 to help people understand how the averages are arrived at and also to realise how important and valuable the data available in hourly spreadsheet form is. That is also the reason why we asked Minister Miles for a 24/7 monitoring station to be located in the Yatala/Ormeau area way back on the 8th of March 2015.

Table below showing PM2.5 levels (which include dust) collected and recorded over a one week period**, Prepared by YRA committee for illustration purposes only.**

TIME Of Day	Monday. PM2.5 Ug/m3	Tuesday PM2.5 Ug/m3	Wednesday PM2.5 Ug/m3	Thursday PM2.5 Ug/m3	Friday PM2.5 Ug/m3	Saturday PM2.5 Ug/m3	Sunday PM2.5 Ug/m3
12:00am	1	1	1	1	1	1	1
1:00am	1	1	1	1	1	1	1
2:00am	3	3	3	3	3	3	3
3:00am	8	8	8	8	8	8	8
4:00am	9	9	9	9	9	9	9
5:00am	13	13	13	13	13	13	13
6:00am	15	15	15	15	15	15	15
7:00am	20	20	20	20	20	20	20
8:00am	40	40	40	40	40	40	40
9:00am	50	50	50	50	50	50	50
10:00am	50	50	50	50	50	50	50
11:00am	58	58	58	58	58	58	58
12:00pm	10	10	10	10	10	10	10
1:00pm	11	11	11	11	11	11	11
2:00pm	3	3	3	3	3	3	3
3:00pm	3	3	3	3	3	3	3
4:00pm	1	1	1	1	1	1	1
5:00pm	1	1	1	1	1	1	1
6:00pm	1	1	1	1	1	1	1
7:00pm	1	1	1	1	1	1	1
8:00pm	1	1	1	1	1	1	1
9:00pm	2	2	2	2	2	2	2
10:00pm	3	3	3	3	3	3	3
11:00pm	3	3	3	3	3	3	3
	Total	Total	Total	Total	Total	Total	Total
	308	308	308	308	308	308	308
	Average	Average	Average	Average	Average	Average	Average
	12.83333	12.83333	12.83333	12.83333	12.83333	12.83333	12.83333

Note 1: in the above table 308/24 = 12.83333 so the average level for the day is 12.8333ug/m3 this is well below the daily average limit of 25ug/m3, but if only the daily average figure was reported instead of showing the hourly readings one would not know that there were actually 4 hours in that day when the levels spiked over the recommended daily average, and one would have no way of proving it.

The total for the week is 308 X7 = 2156 so the average level for the week is 2156/(7X24) = 12.83333ug/m3, again this seems an acceptable figure, however if this were to be repeated over 52 weeks it would result in an average of 12.8333/m3, which would not be acceptable as the yearly average limit is 8ug/m3. Also note that levels in yellow spiked over the 25ug/m3 limit was 7x4 =24 times during that week but one would have no way of proving it if they were presented with a report that told them the weekly average was only 12.8333m/m3.
The only monitoring (**in our opinion**) which gives a true insight into the true dust levels experienced at the Ormeau/Yatala air quality investigation is the TEOM analyser (short for Model 1405-DF dichotomous TEOM**) unfortunately** this was only used for 8 months at a site 1.5km from the nearest quarry and not at all, at the more sensitive receptor in Vennor Drive Ormeau which is only some 500 metres away from its nearest quarry. This is mind boggling, as the report states on page 8 that Vennor Drive Ormeau has historically been the source of ongoing dust complaints.

It has not gone unnoticed that the spreadsheets associated with the "Ormeau/Yatala air quality investigation" were not mentioned anywhere in that report, YRA committee members had to find them online and as they were not readable because the columns were compressed we in turn requested for DEHP to present them to us in a more legible style.

Obviously the TEOM analyser should have been used for the full 12 months at both the selected sites and at least in one more downwind residential site so that cumulative PM10 and PM2.5 dust impacts could have been established not only from the quarries but also from all other existing dust pollution sources. It would appear that the principal aim of the air report was to establish that quarries emissions are benign and little to no attempt has been made to establish a true picture of cumulative dust which should not exceed the NEPM air levels. Again we refer you to page 26 of the following link to demonstrate that what we are stating is very possibly true. https://envirojustice.org.au/sites/default/files/files/Submissions%20and%20reports/Envirojustice_air_pollution_report_final.pdf

Asbestos Sampling

While waiting for the test to be conducted in regard to any asbestos levels in our air, we found during our research an Australian Government Department of Health article titled "Who is at risk of developing asbestos-related diseases" refer link http://www.health.gov.au/internet/publications/publishing.nsf/Content/asbestos-toc~asbestos-health~asbestos-risk-diseases

In this guide to the general public we are told that we are all exposed to low levels of asbestos in the air we breathe every day. We are also advised that ambient or background air usually contains between 10 and 200 asbestos fibres in every 1000 litres or in 1 cubic metre (**equivalent to 0.01 to 0.20 fibres per litre of air**). We are also advised on that same page that most people do not become ill from this exposure. Further down the page we are told "Although there is no absolutely safe level of exposure to asbestos fibres, occasional exposure to low levels of fibres poses only a low risk to your health."

We noted that on page 19 table 8 of the "Ormeau/Yatala air quality investigation" titled "Table 8 Asbestos monitoring results" shows that the concentration in fibres/ml was below <0.001, this equates to 1 fibre per litre and 1000 fibres per 1 cubic metre. This (<0.001 reporting limit of detection) we understand is 5 times to 100 times the abovementioned ambient or background asbestos levels.

We also noted on page 19 that the concentration of respirable fibres was below the reporting limit of detection of 0.001 fibres/ml OR as we have deduced below the reporting limit of detection of 1 respirable fibres per litre of air.

- Could someone please explain if reporting limit of detection means that if the fibre count is below 1 respirable fibre for instance if it was 0.9 respirable fibres per litre then that would be considered ok??

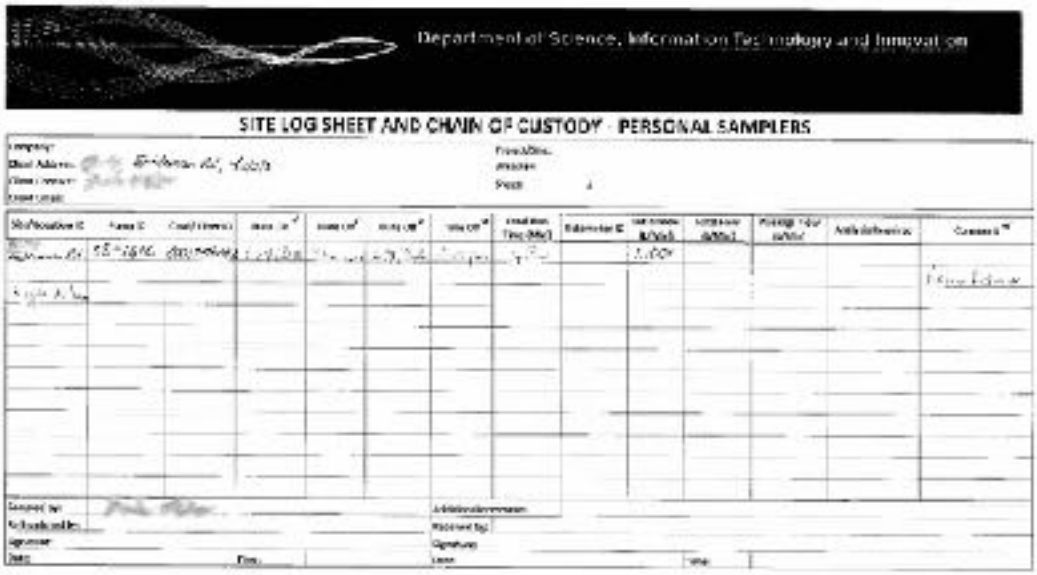
  We used the litre as a unit as we believe that on average humans breathe 10 litres per minute, so in effect if the concentration were to be 0.9 fibres per litre then we would pass through our lungs 10x0.9x60x24 = 12,960 respirable fibres in a day. This is a bit of a worry but then <0.001/ml or <1.0 respirable fibres could also mean 0.1 fibres per litre in which case we would pass through our lungs 10x0.1x60x24= 1,440 respirable fibres.

- We note that there were no asbestos fibres detected in any of the 4 samples and also note that only 1 non-asbestiform actinolite fibre was found in the sample from Enkleman Road which was collected from a total volume of 500 litres over 8 hours. As we breathe 14400 litres per day could you please confirm if the amount of non-asbestiform actinolite that we breathe in at Enkleman Road would be 1 x14400/500 = 28.8 fibres per day if that concentration was on a continuous basis??

Although the results from the 4 particle samples on page 19 appear to be below what we actually expected after having read up on ambient asbestos levels in Australia**, we suspect that the test may have been flawed**. We also note that no additional tests were carried out by DEHP or DSITI personnel at either of the two monitoring sites or at any other location as was advised by DEHP in their email dated 16 August 2016. We find it most disturbing that a test as serious as asbestos level sampling was left to us amateurs alone (after a 20 month delay) with not one professional reading by either DEHP or DSITI personnel.) i.e. only 4 tests of 8hour duration amounting to 32 hours in total and left to residents only to conduct, is considered unprofessional and HIGHLY UNSATISFACTORY!

At least two residents who participated in the asbestos sampling received two sets of conflicting written instructions in regard to shutting down the instrument. Please view the log sheet, the two sets of instructions and the residents comments which were attached and cross referenced to the log sheet (just in case the two became separated) and note that one resident advised DEHP of this possible error on the test form that was returned with the instrument. The logic about the shutdown procedure was and is to us that basically the asbestos sampling instrument is a precisely calibrated miniature vacuum cleaner which when run over an 8hour period draws through a filter/asbestos fibre collector 500 litres of air. When we use our vacuum cleaners at home we turn off the power before attempting to remove and empty the dust bag.

The following 5 pages are copies of the documents that were handed back to a DEHP officer when they came to collect the asbestos sample.



As there is not adequate provision for the full description under the Site Log sheet, & the Comments column, please refer to the attached 2 pages titled * Comments with relevance to DSITI Log sheet for dust sample taken 6/4/2016.

COMPRESSED FIELD STANDARD OPERTATING PROCEDURE FOR PCXR8 UNIVERSAL SAMPLE PUMP (ADAPTED FROM Catalog No. 224-PCXR8)

This simplified field procedure is for the PCXR8 universal sample pump shown in fig. 1a below

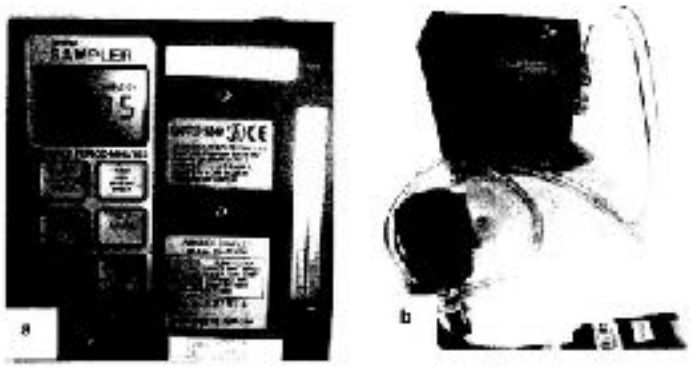


Figure 1: PCXR8 universal sample pump user interface function keys

Connect the filter as shown in Fig 1b above

Use the Date Take screw driver to slide the **ON/OFF** switch to the **ON** position

Press the **START/HOLD** button to put the pump on HOLD (e. paused whenever needed.

Record the sampling start time

Record the filter and site specific information (filter No.) on to the fieldwork sheet. Under the monitor location column, indicate dust condition for the day. May include the detailed comments at the bottom of the sheet.

After sampling, before you turn off the pump, record the sample stop time/ sampling period.

Hold the filter in an upright position with the Filter Inlet upwards.

Slide the pump **ON/OFF** switch to the **OFF** position.

Cap the Filter Inlet and disconnect the filter from the pump connecting tube.

Cap the Filter Outlet and store the Cowl away in a zip bag.

For more information, please refer to the detailed procedure or call for support.

OPERATING PROCEDURE FOR NOXRR – UNIVERSAL SAMPLE PUMP

- Connect the clear hose to the sampler box side.
- Remove white (outlet) cap (white) on filter and connect to clear hose.
- Remove black (inlet) cap on the other end of the filter. Keep caps for remapping after sampling.
- Keep filter in horizontal position if possible while sampling
- Use the screw driver to remove tamper proof clear cover.
  - When ready to sample use screw driver to slide the on/off switch to on. Record the sampling start time.
- While sampling
  - Label the current filter with sampler number, start date/time, finish date/time.
  - Fill in the field sheet with sampler ID, filter ID, sampling location, dust observations.
  - Sample for 8 hours (the display is in minutes therefore 480 minutes).
- When the sampling has finished record stop time/sampling period.
- Hold the filter with hose end facing down. Cap the filter inlet (non-attached end) with black cap and disconnect the filter from hose.
- Cap the end disconnected from the hose with white cap, store filter in plastic zip bag. (Preferably store white cap down).
- Turn pump off and replace clear cover over keys with screwdriver.

Comments attachment to DSITI Site Log Sheet for dust sample taken 6/9/2016

The PCXR8 universal sample pump (Asbestos sampler) was delivered to our home on Wednesday 24/8/2016, a day during which and before which we experienced light rain in Yatala. Today, Tuesday 6/9/2016 is the first day since the instrument was delivered to our home that I considered conditions to be suitable for recording any dust containing any possible actinolite asbestos fibre emissions from quarries upwind from our home, as the wind forecast on willy weather for Yatala for much of the day/8 hour period was from a South Easterly direction..

As a reference, and as the front of our home faces the Darlington Ranges where the Hanson quarry is located, I had a quick look into the ranges and noticed and photographed the dust emissions dissipating in a westerly direction.
Obviously the dust from the Hanson quarry would not affect our home today, but it signaled that dust from the other quarries to our East-South East would therefore most likely be in our air.

Note 1
We were provided with 2 pages/sets of instructions on how to start and stop the instrument. I noticed that these instructions conflict slightly, so I chose the procedure which on shutdown instructed us to first:

- Turn off the pump
- Cap the filter inlet
- Disconnect the filter from the pump tube
- Cap the filter outlet.

Note 2
With the instruction notes provided and with the further orientation provided by the two DEHP officers who delivered the instrument, I found this to be a straight forward procedure. As such I am very much surprised, concerned and disappointed, that since I had made my concerns regarding the possibility of asbestos in the dust in our region known to the authorities and DEHP in late 2014, that it has taken some 20 months to get to this late stage where a few residents are now given instruments to do one off readings to determine if there are Asbestos fibres in our air. Why could these tests not have been done by DEHP early in 2015 in a more exhaustive manner at all potential downwind locations"? As a result I am still none the wiser as to whether my family or I have been exposed to breathing in above background levels of asbestos fibres in our air.
In addition DEHP advised me in a letter in December 2014 that they had requested from *"all significant quarry operations in the area to submit their dust deposition results from the preceeding 2 years and petrographic reports for review"*, I am still none the wiser as to what the results of those tests were and if any of the material contained fibrous actinolite.

I sincerely hope that all current sampler test levels will be made available to all the community along with information as to the exact location where the samples were taken. Additionally I feel that the results of all petrographic tests are made known to the public in the final report as an assurance that there is no fibrous actinolite asbestos in the rock being extracted in our area.

The following are photos of dust in the Darlington Ranges taken at various times(digital files can be emailed on request).

Photo of dust eminating from the direction of the Hanson Quarry. Taken on 10/2/2008. Left is East and Right is West. When the wind is from the East the dust goes in the Bahr's Scrub Bannockburn direction. When it is from the West it goes in the Ormeau direction and when it is from the South in Yatala's direction. Ref RIMG0223

Photo of dust taken 6/9/2016 Ref RIMG2779. Dust from same area some 8 years on. On this day it was not so obvious as the wind was stronger.As mentioned this dust would not have affected us on this day, but it surely would have affected someone.

Location of the Sampler for the 8 hour period on the 6/9/2016. Ref RIMG2783

All Photos can be emailed forward upon request, should better clarity be required.
More photos taken between 2008 and 2016 can also be provided along with links to more recent videos of the dust in that same location.

- Minister Miles could you please instruct DEHP to confirm that the 4 asbestos test samples are considered acceptable irrespective of the shutdown procedure at the end of the tests. If not acceptable, please arrange for DEHP or DSITI staff to perform these tests again at these residential sites, and at the nearest sensitive receptors/properties.
- If the 4 asbestos tests are deemed acceptable, please instruct DEHP or DSITI staff to take the additional tests that we were advised would be taken in the DEHP email dated 16th of August 2016.
- We would also request that the results from petrographic reports from all significant quarry operations in the area as requested by DEHP in 2014 and advised by DEHP in a letter ref CR65296 dated December 2014 are also made available to the public.

Possible/Probable/inevitable (take your pick) Future air pollution in Yatala/Ormeau.

Minister Miles you will no doubt be aware that for some years the YRA committee have been lobbying both the previous and current state governments to **NOT** remove the Industry separation distances that the labour government introduced in 2009 specifically to protect residential properties from industrial impacts. This in fact would have made it impossible for SPECIAL INDUSTRY (a more recent benign term for hazardous industry) and High Impact industry from being able to be established in **our** area. Unfortunately despite all our efforts and pleading your state government saw fit to instruct the Gold Coast City Council to remove the industry separation distances from their new CITY PLAN 2015, Zone map -ZM6- Ormeau Hills, later changed to Zone map-6 Yatala.

This map and earlier maps are rendered useless and misleading as they are overridden by our State Governments mantra " that all development applications will be treated on their merit" i.e. as has occurred under the old maps a Biomass plant (yet to be built) has been approved in the Planning and Environment Court Please view the following links to a similar bio-mas plant at Rocky point Woongoolba. https://www.youtube.com/watch?v=JQSumV5xl_c https://www.youtube.com/watch?v=naMK5O3L1qs and more recently at least 2 more High Impact 24/7 Industries have been approved in an area of Ormeau which in the latest zoning plan is shown as low impact.

WHAT HAS THIS TO DO WITH THE ORMEAU/YATALA AIR QUALITY INVESTIGATION YOU ASK

1. Please refer to the following link: http://www.cleanairaction.net.au/south_east_qld_fs you will note amongst other things that under fine particle emissions PM2.5 that the Bio-mas plant in Woongoolba (aka Rocky Point bio-mas plant) is rated 4th amongst the 6 most significant sources of PM2.5.This plant is similar to what has been allowed to be introduced in our area just some 600-700 metres from elevated homes. We suspect it's PM2.5 24/7 output alone (i.e. 43,234kg of PM2.5 as per page 2 of that clean air action report even when added to a background of 5.0 at the Luscombe site as per page 14 of the "Ormeau/Yatala air quality investigation 2015-2016" will be enough to drive the Yearly permissible limit over the average of 8ug/m3. Additionally we feel that ever since that bio-mas plant was approved absolutely every High Impact industry application such as the 2 recently approved high impact industries should have their predicted emissions added to this predicted total cumulative emission. Otherwise we could well end up in the next couple of years with dozens more High impact or Hazardous industries with additional PM2.5 emissions making the background level in the Yatala/ Ormeau region very hazardous indeed.

   You must realise that we are not just talking about PM2.5 and PM10 emissions we are talking about all the cumulative emissions which are monitored at the various 13 current monitoring sites in QLD except in Yatala where we have none) However we would never be able to prove it because the nearest monitoring station is in Springwood some 17km away, and to make things even harder to prove, the Springwood monitoring station is not even downwind from here i.e. if Yatala was

experiencing Easterly breezes and getting a load of PM2.5 it would have well and truly dissipated and have gone past Springwood anyway. If we had Westerly breezes the pollution would be blown across Ormeau in the direction of the Gold Coast and away from Springwood. We therefore consider any referencing of background levels to the Springwood monitoring station totally useless and misleading.

2. We checked one of the recent High impact industry applications in our area which has since been approved. This can be found on this link http://www.goldcoast.qld.gov.au/planning-and-building/planning-development-online-486.html then go to "Development application tracking and search for MCU201601166, there are many pdf files spread over 3 pages, on page 2 scroll down towards the bottom and you will find a file titled "COMBINED APPLICATION MATERIAL CHANGE OF USE RECONFIGURATION OF A LOT AND OPERATIONAL WORKS REPORT PART 12. Processed 28/10/2016 pdf(3449kb). Much of this file is related to the air emissions of the proposed plant and is probably more professional **(in presentation to our untrained eyes**) to some we have seen in the past applications. However, upon inspection we noted that the background concentrations that the emissions were being compared to were based upon background levels in monitoring stations in "Wooloongabba", "North Maclean" and "Springwood". As an example from page 10 of that report the Nitrogen oxides annual average for the Maclean monitoring station is 6.2ug/m3, on page 13 in table 3.3 "Predicted results" you will find that the predicted source emission for NO2 (Nitrogen oxide) is 1.76) ,this is then added to the background concentration in North Maclean **(22km west of Yatala!!)** which was 6.2ug/m3 to arrive at a total of 7.96 rounded off to 8ug/m3 cumulative which is well within the criteria of 62ug/m3. This may look great particularly when you view the impressive aerial distribution diagram on page 16, BUT IT IS ALL BASED ON A BACKGROUND LEVEL FOR NO_2 at North Maclean and NOT THE CURRENT OR FUTURE BACKGROUND LEVEL OF YATALA OR ORMEAU.

   For instance it does not allow for the future emissions of the Bio-mass plant we will have here. It does not allow for existing emissions of NO_2 from other existing plants in our area and it does not allow for emissions of other plants which may currently be under consideration or MCU application phase.
   There are also other toxic pollutants named in this application and they are Benzene, Toluene and Xylene we haven't even looked for PM 2.5 or PM10 emissions from this plant but we are quite sure that all chimneys will produce some levels which can again be referenced to background levels in Springwood(check them out on google or the governments website) but their emissions are added to background levels of the Springwood monitoring station which is some 17km away, again this does not take into account background levels in our area.

   We do not consider this **absolutely ridiculous and farcical** situation to be the fault of the developers, their consultants, or even Council (as we see it they are just following guidelines**)**

It is however the responsibility of our government and any regulatory body it appoints to approve development applications.

You all need to be aware that all Australians are by law entitled to the same level of clean air which in our view must be monitored in a more local area and not based on a background level many kilometres away (the monitoring stations mentioned above are 17km and 36km North West of Yatala and the other is 22km West of Yatala) and not even downwind from the source (you might as well locate a monitoring station on the North Pole to get even better predicted and benign results). Keeping a tally on approved emissions is not rocket science and it will be all much easier and **honest** to monitor these emission levels where humans actually reside and have to breathe the results of your decisions. Again please have a look at the following link to appreciate that we are totally aware of what has been and is currently occurring.

Please refer to pages 23 and 26 in link https://envirojustice.org.au/sites/default/files/files/Submissions%20and%20reports/Envirojustice_air_pollution_report_final.pdf

SUMMARY

Minister Miles and your team - Please advise:

- Will a bio-aerosol investigation be carried out and if so when.
- Do you consider the Quarry permits presented acceptable and if not, what are you going to do about it and when?
- Are you satisfied with the Ormeau/Yatala air quality investigation?
- Are you satisfied with the asbestos sampling that was carried out and if not when will you instruct DEHP/DSITI to carry out the tests?
- Will you make the petrographic tests that were requested by DEHP from all the quarries in 2014 available to the public?
- Are you satisfied with the current development application procedure which does not take into account local pollution levels but uses background levels of monitoring stations as far away as 36km away AND which does not take into account the progressive level of accumulated pollution for every new additional chimney approved in our area?
- Will you and your fellow MPs ensure that a Springwood style monitoring station with all the necessary sensors (not just PM10 and PM2.5) is provided to our community and is positioned in an area in Yatala most likely to be impacted by the cumulative emissions from industry and quarries, **without any further delays**. We would like Yatala to be included in the list of monitoring stations available on this link https://www.ehp.qld.gov.au/air/data/search.php The following presentation is to illustrate to yourself and our residents, just how good and transparent that data is, it is also exactly what we are requesting from our government. You will note that all that data, as you may already be aware is summarised on a yearly basis and presented by your government and all the other States to the NEPC(National Environment Protection Council) please refer to the following link for help in accessing current and past live air data in Springwood https://www.youtube.com/watch?v=YTeCQag8X6U&feature=youtu.be

The YRA committee, aided by some members, have voluntarily put in hundreds of hours into ensuring that our area and quality of life and health is not ruined, we have done this over a long 8year period. We would appreciate a prompt and honest answer to all of our points, including points made in our letter but not necessarily in this summary.

PLEASE, we do not want to be shunted from Minister to Minister. We are well aware that our requests involve several Ministerial responsibilities, so we ask that you and your Department take responsibility for the actions we have requested. However a condescending answer along the lines of "**every development application will be considered on its merit"** is totally unacceptable and we trust that you realise that our community deserves more consideration and respect than such answers imply.

Minister Miles, after so many years of requests from the community to resolve the issues in the Ormeau / Yatala and surrounding areas affecting those constituents, we can truly say that we expected more from our State Government and affiliated authorities. It is now over to you all to rectify this

apparent oversight, as ignoring the issues raised, will not be an option for this community. It must be noted that ignoring the stated matters, will very likely be noticed by many community bodies throughout Queensland and in fact all over Australia. **EIGHT (8) YEARS of nothing notable occurring to arrest our concerns is JUST NOT ACCEPTABLE!**

Please note: The YRA committee have not had any assistance from any of the sources in the links provided, we have purposely not copied or redistributed any information in those links, but have merely pointed to the pages of those documents which are available to the public online, we encourage everyone to read the entire documents, so that you can all form your own impressions of the information presented and our interpretation of it.

Yours truly,

YRA committee:

Attachments to this Letter:
1. Air investigation timing chart 9 July 2017
2. Ormeau Air Quality data.xlsx
3. Luscombe Air Quality data.xlsx
4. Ormeau-Yatala air quality investigation report.pdf

CC:
Mr Jonathan Black - Director General DEHP
Mr Brett Glosko – DEHP Gold Coast
Hon Bert Van Manen – Federal Member Forde
Premier Annastacia Palaszczuk – Premier of Queensland
Hon Mark Boothman – State Member for Albert
Mayor Tom Tate – Gold Coast City Council
Deputy Mayor / Division 1 Councillor – Donna Gates
ALL YRA Members

Yatala Residents Alliance
A COMMUNITY VOICE

MISSION STATEMENT: "A Community voice surrounding topics which impact the lifestyle, health and environment of residents near commercial and industrial developments in the Yatala Enterprise Area"