

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
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16th June 2016

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Ref: CTS 12238/16 Letter to YRA from Dr Miles dated 8 June 2016

Dear Dr Miles,

Thank you for your letter and the time you have spent considering and investigating our concerns.

If we may detract momentarily before we address your reply, we would like to draw your attention to the attached Newspaper article titled "Asbestos article July 2015" and the following information that we obtained in regard to dust emissions from 2 of our local quarries for the years 2012-2013. It is disturbing to note that Hanson, in their recent application to expand their operations, publicly acknowledged that the rock found at their quarrying area (which is also found throughout the Darlington Range) contains 3% asbestos and 37 % crystalline silica.

This information was obtained from the QDOS Facebook page showing extracts from **the National Pollutant inventory. Refer attachment titled "Hanson's Silica Dust Output PDF"**

Holcim quarry 2012-2013 dust emissions
PM10 dust 110,000kg
PM2.5 dust 4,200kg

Hanson quarry 2012-2013 dust emissions
PM10 dust 35,000kg
PM2.5 dust 3,000kg

Therefore the total dust emissions from these two quarries alone = 152,000 kg for that year

Based on the makeup of the rock in the Darlington ranges (containing 3% asbestos and the 37 % crystalline silica) this in turn gives us:

$152,000 \times 37\% = 56,314$ kg of crystalline silica dust

$152,000 \times 3\% = 4,560$ kg of asbestos dust

The asbestos dust fibres, which to our understanding are the most dangerous, are some 2 millionths' of a metre in length and are therefore in the PM2.5 range, so the potentially dangerous asbestos emissions from these two quarries equates to $\Rightarrow 7,200\text{kg} \times 3\% = 216$ kg of potentially lethal asbestos fibres. We also believe that asbestos fibres smaller than 10 millionths' of a metre (**of which there are possibly some 4,560 kilograms released into our surrounding air**) if inhaled or ingested in drinking water, can also result in serious health complications.

NOTE: the above calculations only take into account two quarries in our area. The actual level from all four quarries could quite easily be double the above dust emissions considering those other quarries do their rock crushing in the open (**we are sure your staff will be able to verify our assumptions, as they will have the emissions for the 2015-2016 years readily available for all the quarries in our area**).

But trying to get a more accurate calculation seems pointless when you consider the newspaper article attached where it is stated that **inhaling one asbestos fibre alone can result in a person developing the form of lung cancer known as Mesothelioma.** The article also mentions that people handling/washing asbestos covered clothing of their spouses also contracted Mesothelioma. (*We suspect that those unfortunate family members were not subjected to constant dust levels containing asbestos fibres that we may be subjected to on a 24/7 basis.*)

We will now address the matters raised in your response to YRA dated 8th June 2016. We ask that you and your team plus the other State Government Ministers and their Departments, as well as any other controlling authority responsible for areas associated with Business Approvals, Compliance Matters, Health and Safety take the time to closely evaluate our response to your letter of the 8th of June 2016.

Dr Miles, the community is not arguing against local business development – we welcome it. **What we do ask is that, in particular, the State Government takes our concerns into careful consideration as a matter of urgency because the health of people who live and work in this area continues to be put at serious risk. It can NOT BE LIKE THIS if those in authority and those whom have, or want to have, a business in the area abide by the rules.**

Asbestos Dust

Dr Miles, the 3% asbestos content and the 37 % crystalline silica content of the rock in the Darlington Ranges is the very reason that we requested the DEHP, as a matter of urgency in December 2014, to carry out air quality tests and install live 24/7 air quality monitoring stations. We are extremely disappointed to find that there is absolutely no reference to asbestos in any of the investigations mentioned in your letter dated 8 June 2016.

As we have been anxiously waiting for this information for some 1 ½ years we request that the matter of asbestos emissions in our area is addressed and made known to us **immediately**. We would also be very much obliged if your experts could advise in writing how many million asbestos fibres there are in one gram of PM 10 and PM 2.5 asbestos dust. (*i.e. if the fibres are 2 microns in length how many million fibres would it take to achieve a mass of 1 gram*)?

Crystalline Silica Dust

As we understand it *according to the Victorian EPA Protocol for environmental management: Mining and extractive industries, large mines or quarries greater than 500,000 tonnes/year extraction which are known to have silica in their rock must provide level-1 data over a 12 month period which consists Real time continuous 24-hour PM 10 and PM 2.5 data for a 12 month period, analysis of crystalline silica (PM 2.5 fraction) and heavy metal content (PM 10) where applicable.*

Because we believe that 4 large quarries in our area (**one of the quarries alone has been described as one of the largest in Queensland**) process some 6 or more times the volume specified above i.e. >3 million tonnes and because we believe that most of the rock crushing is done in the open **and in particular because we have been informed** that the rock analysis from one of the quarries revealed that it was 37% silica and 3% asbestos, we requested in December 2014 that DEHP carry out similar tests in the Yatala and Ormeau region.

We also requested that similar 24 hour live monitoring stations as per **DEHP's link:**

http://www.ehp.qld.gov.au/air/data/search.php?day=20&month=05&year=2016&hour=08&category_id=1&mode=measurement&goto=Latest+hour

are installed in our area with the data available 24/7 to any resident who wants to check.

We are again extremely disappointed to find in the link provided in your letter www.data.qld.gov.au/dataset/air-quality-monitoring-2015 an excel spreadsheet which only contains dust data from 14:00pm 2/9/2015 until 23:00pm 31/12/2015. This is only 4 months of data recording and well short of the 12 months required for a much smaller operation. Dr Miles, when we first opened the spreadsheet we found it to be unreadable in that the first 66% was blank and the columns had to be widened in order to be able to read the data. We amended the worksheet titled it "*Luscombe-aq-2015 saved for YRA ref 8 June 2016 rev-1.pdf*" and provided it as an attachment for your reference. We were not aware and still do not know exactly where in Luscombe the dust monitor was located. You will by now know that we have several quarries in our immediate vicinity and as such we would have expected some dust monitors being located in the **inhabited downwind areas of Yatala and Ormeau** in order for the monitors to truly measure the cumulative dust from all the quarries.

Your DEHP officers will be well acquainted with our area and know, that due to the topography, the odours we have been subjected to for over 6 years can be very directional under various wind conditions and directions, in that one street at any one time can experience very objectionable odours whereas another street only a short distance away will not be affected at all. **Based on this observation** we find it hard to imagine how a monitor located in some remote uninhabited area can represent actual dust levels from various quarries experienced by downwind residences in Yatala and Ormeau which themselves will experience different levels depending if the winds are from the East or from the West. How can we be expected to believe that **ONE MONITOR IN LUSCOMBE**, as shown from the data provided to have been used in this case, can represent dust levels in very different locations (Ormeau and Yatala) either of which will experience much higher levels when the wind is blowing in their direction?

- We ask that your experts confirm in writing that the selected dust monitoring site used to generate the 4 month excel data, is truly representative of the cumulative dust levels that Yatala and Ormeau residents downwind from the quarries have to breathe 24/7. For instance, please refer to the attached file titled "**Quarry dust complaint 44**", do the readings recorded over a 4 month period at the monitoring location in Luscombe represent the actual dust levels being experienced by Ormeau residents in Vennor Drive and nearby streets?
- If this guarantee cannot be given, we request that several monitors are promptly located in downwind locations of Yatala and Ormeau and that the tests are repeated immediately over a 12 month period and that all data is available online immediately for easy and ready access to all residents and quarries from the first day of their operation and not after a further 12 month delay.

Bio-aerosol Monitoring

Dr Miles, your letter informed us that a compost associated bio-aerosol monitoring program was carried out in November 2015. We draw to your attention a recent complaint from a resident in Tristan Court, Ormeau, and **(submitted 6 June 2016)**. Please be aware that the residents in that location have been complaining to the Gold Coast City Council, DEHP and to their State member for years about dust **(and amongst other things metal projectiles breaking their roof tiles or landing dangerously close to residents in their backyards, from mulching machinery parts or metal mixed in with the green waste)** from a large green waste shredding operation just some 100 metres away from them. You will note that we have made a mention of that operation in our original request for monitoring. Two recent complaints are provided in the attachments and are labelled "*Dust complaint 583*" and "*Dust complaint 581*" **(further evidence can be forwarded to yourself upon request; some of this has also been emailed more recently to the pollution hotline)**

As we have mentioned in our earlier correspondence and provided links to overseas tests, *bio-aerosol emissions from green waste shredding are considerably higher than from compost turning*. We sincerely hope that DSITI have in fact carried out tests downwind of that site's emissions as those unfortunate Tristan Court, Ormeau residents are up to their ears in it, without anyone from any level of government thus far stepping forward and putting an end to this gross injustice.

As you can appreciate 100 metres separation from an *Aspergillus fumigatus* generating source is not a safe distance for residents, particularly if they are elderly or if they have a pre-existing condition such as asthma or if they are young children.

- Dr Miles, we ask that you instruct your experts to ensure that adequate bio-aerosol level tests have been carried out in the conditions that the Tristan Court, Ormeau residents are constantly subjected to. If not, we request that these tests are carried out immediately and that appropriate action is taken by DEHP AND/OR Gold Coast City Council to have this farcical situation discontinued immediately. Residents should not be imprisoned within their homes because of the continuously dangerous conditions being created by inappropriate industrial activities which, for whatever reason, have been and are being allowed far too close to residential areas!

Odours observed within the community

Dr Miles, we note and are familiar with the suggestion in your reply in regard to the procedure for reporting odours. With all due respect, we again re-emphasise that this has not worked successfully in Yatala.

You or your staff only need to Google the area as it stands currently (and has stood for the past 8-10 years) in order to realise that there **is only one huge outdoor windrow composting** site, upwind and directly across the road from residences, capable of producing those odours. This site, despite hundreds of complaints since and possibly before 2010, has been allowed to continue to generate and get away with offensive odours. In fact, when it applied for an expansion of its composting operation and also submitted a MCU for additional ERA's, one of which was a Bio-mass burning green-waste electricity generating plant, all were approved by the Planning and Environment Court on the 7th of May 2014. This was despite the Gold Coast City Council unanimously rejecting the application and despite 3 residents who lived directly opposite the site and the many other residents surrounding the site, submitting objections to the MCU about the then current odour emissions. After hundreds more complaints since the Court approval of the MCU, the DEHP finally observed offensive odours in the immediate vicinity and the Planning and Environment Court issued a strict EPO on the 8th of April 2015 which included hefty fines and the bringing forward the construction of an enclosure for housing the initial compost mixing and decomposition. **This sealed enclosure was the basis of the original MCU court approval** and was to be negatively aerated and fitted with a bio-filter to minimise harmful emissions of bacteria, mould spores/Aspergillus Fumigatus and other potentially harmful bio-aerosols and was to be completed by 31 January 2016.

However, "sorry for this, but this unfortunate saga continues"! Because of the way the conditions in the court order were presented DEHP have informed YRA that this enabled the offending company to not construct the sealed enclosure complete with bio-filter and as anyone would logically expect, the odours and complaints once again emerged.

Although the odours have once again abated, perhaps due to the vehement complaints and perhaps due to the fact that the wind direction at this time of the year is in the opposite direction, the fact of the matter remains that the original condition of the Court's MCU appeal approval was that the sealed enclosure which includes a bio-filter and based on which it was claimed that the odour emissions would be reduced by 50%, the enclosure construction was to commence by the 7th of May 2016 (2years from the judgement date) **This date has since passed!**

- Minister we ask that you instruct the relevant officers in your department to ensure that the court conditions are observed to the letter. Please understand that our community will not tolerate any further delays to the construction of **the promised** sealed enclosure complete with bio-filter as originally approved by the Planning and Environment Court, as it at least promised a halving of the odour intensity and minimisation of harmful bacteria/spores etc. / etc...

Please forgive us if we seem irreverent, but you may by now appreciate that we are fully conversant with the complaints system and its gross inadequacies, which we hope you will address.

24/7 Air quality monitoring

Dr Miles please refer to the attachment labelled "Air pollution today 22 May 2016 from DEHP live monitor.pdf"

Air quality live data link.

http://www.ehp.qld.gov.au/air/data/search.php?day=20&month=05&year=2016&hour=08&category_id=1&mode=measurement&goto=Latest+hour

Please note that we mean no disrespect by going into the details below as we are very much aware that you understand the terminology, however some of your staff, other Ministers and their teams and some of our residents, may not be so well informed, so the detail is for their benefit.

The screen shot of the table shows air quality data for the **20th of May 2016 between 7:00 am – 8:00 am**. Obviously all the particles in the columns below can be detrimental to human health if they are present in excessive levels. That is why they are being monitored.

We are particularly interested in the Column titled "Particle PM 2.5 (24hr av) (ug/m³)"

PM_{2.5} means particles with a mean aerodynamic diameter less than 2.5 microns and this further means particles less than two and a half millionth of a metre in size. Particles which are so small can be absorbed deep into our lungs and can in excessive volumes and over long periods of exposure cause serious damage to our respiratory system/i.e. our lungs. As we understand it the EPP (AIR) 2008 guideline for PM 2.5 is 25ug/m³, this mean 25 millionths of a gram per cubic metre. **However note:** if the PM_{2.5} dust contains silica more precisely known as respirable crystalline silica (defined as PM 2.5 fraction) then that dust is considered far more harmful to human health and the acceptable level for continuous human exposure is 3ug/m³ Annual average.

The tables and data in this link provided are to our untrained eyes absolutely top class, **and we will settle for nothing less**. Note: anyone can enter any past time and date and obtain instantly the air quality for all the monitoring sites in Queensland on that particular year-month-date and time. For example the data in the screenshot shows that the PM 2.5 dust pollution levels at that time in Cannon Hill 27.1 ug/m³ are higher than levels in nearby suburbs such as Wynnum West which at that time is only 12.6 ug/m³.

We consider this will make it difficult for anyone to exceed their permitted emissions without immediately appearing on the radar, and more importantly the health of the residents in downwind and surrounding areas will be protected 24/7.

We are well aware that the live data in those tables does not show respirable crystalline silica levels or asbestos levels, however a high reading (such as the 27.1 ug/m³ in the table provided in the screen shot for Cannon Hill) if it were at a residence adjacent to and downwind from a quarry in Yatala or Ormeau would indicate that high levels of crystalline silica are contained in that dust and that proportionately high levels of asbestos fibres are also in that dust.

Additionally as Yatala and Ormeau residences will be downwind from the emissions of many hundreds of new industries there is a very real prospect for our air quality to deteriorate significantly from companies who do not comply with their approval conditions either purposely or unknowingly if their equipment is malfunctioning, or even from complying companies simply because of the sheer volume of industries which will be concentrated so close to our residential areas. **The live air quality monitoring stations that we are requesting of which there should be at least 2 (one in Ormeau and one in Yatala)** need to monitor all the listed pollutants and not just dust and will be a clear signal to all would be polluters that they may not “crop dust the Northern region of the Gold Coast”.

With all due respect, please do not reply to our letter and live monitoring request in the manner (**of your predecessors**) that all future development applications will be treated on their merit and that all will have to comply with stringent regulations and limits OR that it is up to Gold Coast City Council to make the final decision “as we all know by now that it is not the case”. It has very clearly been demonstrated by the amount of grief caused to our residents over many years that the authorities, be they the DEHP and/or Gold Coast City Council, have not been successful and cannot ensure the compliance of two businesses which produce excessive obvious obnoxious odours and visible dust pollution. Therefore it is not unexpected that YRA feels those authorities are currently in no position to control hundreds more possible polluters when, and if, they are all concentrated in one area without the help of live monitoring stations. These need to be installed **now** so that a readily recognisable reference point is established.

Yours Truly,

YRA Committee Member

FOR and on BEHALF of the entire YRA Committee and YRA Members – all of whom have received a copy of this correspondence and your letter dated 8th June 2016.

Please read this letter with attachments provided in the email and labelled:

- 1- Letter to YRA from Hon Dr Steven Miles MP dated 8th June 2016
- 2- Asbestos article July 2015
- 3- Luscombe-aq-2015 saved for YRA ref 8 June 2016 rev-1.pdf
- 4- Air pollution today 22 May 2016 from DEHP live monitor.pdf
- 5- Dust complaint 581
- 6- Dust complaint 583
- 7- Odour complaint 584
- 8- Hanson’s silica dust output.pdf
- 9- Quarry Dust Complaint 43
- 10- Quarry Dust Complaint 44

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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”

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