

## Inquiry into Health Impacts of Air Pollution in Victoria

Mr Anthony Polack

**Organisation Name:**  
**Your position or role:**

### YOUR SUBMISSION

**Submission:**

Dear Committee,

I am a concerned citizen who recommends that the Government adopts the recommendations of the People's Clean Air Action Plan for Victoria:

#### COAL:

By September 2021, establish a comprehensive plan that sets out specific and enforceable obligations for coal-fired power station operators to achieve Best Available Control Technology (BACT) emissions levels, including the following elements:

- BACT short and medium-term emissions limits for PM10, PM2.5, SO2, NOx, and Hg.
  - Continuous emission monitoring (CEMS) for CO2, PM2.5, SO2, NOx, and Hg, to be installed, maintained and operated, with real-time posting on a publicly available website.
  - A requirement that CEMS be maintained and operated in accordance with international best practices, including annual relative accuracy test audits and quarterly relative accuracy audits.
  - Use of the U.S. National Institute of Standards and Technology (NIST) “non-nulling” or the equivalent reference method to measure stack flow rate of stack gases.
  - A maintenance plan, with specified replacement of parts at intervals based conservatively on prior maintenance history and on-site storage of critical components affecting emissions (such as filter bags, SO2 and NOx reagents).
  - An immediate reduction in generation to the lowest level necessary to maintain grid stability and initiation of shutdown procedures for any malfunction that cannot be resolved within a specified period of time.
  - The use of the cleanest available fuels during any period where a pollution control is not operational (e.g., before the unit reaches the operating temperature needed by its selective catalytic reduction (SCR)).
- Immediate reporting of any upset conditions to the agency and the public. The agency should thereafter investigate and post the results of its review.
- Shutdown of the unit if monitoring device availability falls below acceptable levels.

#### VEHICLES:

By September 2021, develop a comprehensive plan to reduce vehicle pollution, with a focus on vehicle pollution hotspots, including the following elements:

- Low emissions/cleanair zones targeting diesel freight trucks in high-traffic urban areas.
- Anti-idling regulations to require engines be stopped when a vehicle is stationary for more than 1 minute, particularly near vulnerable community locations such as schools and childcare centres.
- A levy or restricted access to the Port of Melbourne for non-Euro6/VI compliant heavy vehicles.
- Incentives for freight operators to upgrade to Euro 6/VI compliant vehicles.
- A commitment to revise urban planning in ports areas with a view to achieving clean air outcomes.

#### WOOD HEATERS:

By September 2021, implement a plan to phase-out wood heaters, including the following elements:

- Progressive restrictions on the use of wood heaters during periods of increased air pollution risk and/or unfavourable weather conditions.
- Require the removal of wood heaters from homes upon sale.
- Subsidise insulation upgrades and heat pump installations for houses that remove wood heaters.

#### AIR QUALITY MONITORING:

By September 2021, develop an air quality monitoring plan that increases the level of, and access to, air quality monitoring and information, including by:

- Installing and/or increasing permanent air quality monitoring stations in every community that is near a major industrial source of pollution, such as coal-fired power stations. Implementing localised monitoring networks in areas with large traffic flow and with high wood-burning heater usage, including the use of low-cost monitors.
- Ensuring access to monitoring data be made available in real-time, on a single website maintained by the EPA.
- Ensuring both current and historical data be made available in downloadable datasets to coincide with the implementation of the Environment Protection Act 2018.
- Funding and implementing an AirSmart health promotion campaign to minimise the health impacts of poor air quality.

**A VICTORIAN INVENTORY:**

Action: The Victorian EPA to complete and publicly release the Victorian air pollution inventory by September 2021, and to update it at least every 3 years.

Action: By September 2021, coal mine and coal-fired power station pollution to be reported separately in the National Pollutant Inventory.

## **FILE ATTACHMENTS**

**File1:** [60624f264cf81-VICTORIA-Clean-Air-Action-Plan-2021.pdf](#)

**File2:**

**File3:**

**Signature:**

Anthony Polack