

**From:** [REDACTED]  
**To:** [EPD\\_Customer\\_Services](mailto:EPD_Customer_Services@act.gov.au)  
**Subject:** Submission against the MRF Fyshwick 201700053  
**Date:** Saturday, 16 June 2018 4:51:05 PM

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TO the Minister for Planning  
Submission against the MRF Fyshwick  
201700053

[EPDCustomerServices@act.gov.au](mailto:EPDCustomerServices@act.gov.au)

I object to the proposal to construct a waste transfer station and railway terminal on the old Shell depot at Fyshwick, a contaminated site. I have many concerns about transport issues and adverse air, odour and noise impacts but I have a particular concern about the health of our waterways and do not consider that this has been properly addressed in the Draft EIS.

I object to the proposal to construct a large waste transfer station at Ipswich street Fyshwick on the basis that the old Shell depot is seriously contaminated with hydrocarbons which have leaked into the groundwater and soil and migrated off site. The potential for these to affect our waterways has been too easily dismissed in the Draft EIS. Jerrabomberra Creek is an important and iconic Canberra waterway. As a community we must take every step we can to protect the environmental integrity of our precious waterways by reducing the adverse environmental impacts that degrade them. The Draft EIS for a MRF on a site which itself is seriously degraded by chemical spillage from its past use as a fuel depot, offers no protection to Jerrabomberra Creek but rather exposes it to further ecological harm. The EIS concludes that there is little risk to the creek since it is 400 meters from the site. This conclusion must be rejected.

The Wetlands is already adversely impacted by sediments, salinity, nutrients and some heavy metals which have no known source but most likely originate in Fyshwick. The EIS claims that the development will have no ecological impacts because these two sensitive areas are too distant from the development. This claim must be challenged on the basis that distance has failed to protect the valued waterways in the past.

The Draft EIS for the MRF at Fyshwick inadequately addressed the issue of the protection of our waterways by ignoring the east west creek directly adjacent to the entrance of the CRS site. This creek has been missed for its potential to carry harmful BTEX contaminants into Jerrabomberra Creek via a channel and pond on the western side of Ipswich Street. Neither Shell nor this developer has undertaken any comprehensive monitoring or testing of the underground and surface waters in this area. I find that astounding. It is not just because we all know that hydrocarbons will migrate through soil and water away from the location of their origins but because the MRF site is crossed by an important storm water channel whose outlet is a culvert into this particular creek.

A geological study of the Canberra region shows an east-west fault zone near the southern boundary of the CRS site which also crosses Jerrabomberra Creek. It is highly likely that the fault zone is related to the east-west creek bed which connects the drainage culvert at the entrance to the CRS site with Jerrabomberra Creek. This fault zone has the potential to provide a pathway for dispersion of hydrocarbon contaminants from the CRS site toward Jerrabomberra Creek, if not into the creek and from thereon into Lake Burley Griffin. Actual dispersion of hydrocarbons along the fault zone/storm water channel into the creek needs to be investigated more thoroughly before any claims about the development not having an ecological impact can be made.

The "ephemeral creek" along the northern edge of the site whose surface water showed some heavy metal pollution also need more rigorous assessment, monitoring and testing. This creek acts at the moment as a drainage channel but will have to be realigned to allow for the construction of the rail terminal. This drainage channel also flows into the above east west creek. Once realigned it will also have the potential to allow hydrocarbons into the Jerrabomberra catchment which unless there is ongoing monitoring of the whole site and its drainage systems will go undetected.

As I have said earlier in this submission the significance for hydrocarbon leakage from the site needs to be investigated by a detailed bore monitoring program along the creek bed adjacent to Ipswich street. Elevated concentrations well above the acceptable standard, of TPH, BTEX, lead, PAHs and LNAPLs were identified in

earlier site investigations done by AECOM for Shell 2010. CRS' s plan to demolish, excavate, backfill and construct on this site entails a high level of disruption and reactivation of the underground water and soil chemical contaminants.

Only widespread testing can demonstrate with sufficient levels of assurance that Jerrabomberra creek will have no adverse impact from this development. I suggest also that an effective monitoring program be set up for underground water and surface water to be conducted on the site and offsite well into the future of this operation.

There is no commitment to any monitoring in the EIS for water or for air, noise or odour also. This is unacceptable as major development of this kind and one with a stage 2 WtE component, should automatically require rigorous monitoring programmes. The monitoring should begin immediately with the start of demolition and construction so that the baseline data is available when the WtT facility begins to add its impacts.

This EIS is judged as deficient in its assessment of environmental impacts and mitigation and should be judged as inadequate and undeserving of approval. I submit the Minister should either send this Draft EIS back for rewriting and when completed empanel and Inquiry board of independent assessors to review it particularly for its impacts on the issues outlined above.

Sincerely,

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