

From: [REDACTED]
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Draft Environmental Impact Statement

Materials Recovery Facility Fyshwick,

Blocks 9 & 11 Section 8 Fyshwick

Capital Recycling Solutions

Submission in Opposition - APPLICATION NUMBER 201700053

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To The Director-General of ACT Planning

Dear Mr Ponton

Please accept this submission on behalf of the Old Narrabundah Community Council Inc. (ONCC) in strong opposition to the CRS development proposed for 16 Ipswich Street Fyshwick, comprising Blocks 9 & 11 Section 8 Fyshwick. Thank you for the extension of time to respond and we do so on a number of grounds that we outline below.

The Minister must ensure that all relevant social, environmental and economic matters necessary for a comprehensive evaluation of this development are provided with sufficient detail to allow assessment.

ONCC submits that the Draft EIS under consideration does not comply with this basic requirement.

The Draft EIS is long, poorly organised, and with inadequate technical and scientific detail relating to a proposal that is complex. It raises significant environmental and health concerns. In addition, it is difficult to read and understand.

ONCC respectfully requests that the Minister, as entitled to do under s.228 of the Planning and Development Act 2007, engage a suitably qualified independent Inquiry Panel of experts to assess each aspect of the EIS for which scientific and technical expertise is required.

The Draft EIS is deficient as follows: -

There is no real Public Benefit.

[1] This is a development that should be situated in broad acre zoned areas, away from built up areas.

[2] The ACT is well served by recycling facilities and given the world oversupply of recyclables we do not need another Materials Recovery Facility (MRF) in the ACT.

[3] Granting development consent for the Project as proposed is inconsistent with the public interest which must be key to planning decision-making. The development in its entirety would deliver congested roads, poorer air quality, risks of accident and fire as frequently occur in similar plants, risks to water quality in the Molonglo Catchment and to air safety at Canberra International Airport among others. The development must be considered as a whole for cumulative impacts and when this is done, the conclusion is reached that Canberra does not need it; that it will deliver adverse impacts to the proposed location and the Canberra community. It should be rejected as not in the public interest.

Insufficient consideration of alternatives.

[4] The National Waste Policy contains a number of strategies including product stewardship framework legislation to allow the impacts of a product to be responsibly managed during and at end-of-life; better packaging management; continued government focus to reduce the amount of biodegradable material sent to landfill and improvements in waste avoidance and re-use of materials in the commercial and industrial waste stream. If the Food Organics and Garden Organics (FOGO) trial is successful in the ACT then the justification for this facility is questionable. It makes no sense when a simpler alternative would be to have Canberrans recycle their waste on the doorstep by providing them with a bin for their green and organic waste. This waste could then be composted and reused.

None of the above strategies were considered in the EIS as required. Alternative sites should also have been considered for both the MRF and the railway hub. They

were not. The EIS should be returned till these and other issues have been adequately addressed.

[5] The transport of waste across borders creates another set of environmental difficulties. How long would it take from doorstep to Woodlawn and what degradation of waste would occur in that period and how would any leachate be captured? It extends the time that the waste is exposed to the environment and the potential to create air, waste, noise and odour impacts. The shipping containers would create methane that would be released directly into the atmosphere. ONCC notes that there was no climate change consideration of this in the EIS.

[6] The risk of waste being kept on site for longer than 24 hours and how to avoid an increase in odour problems and the generation of excess leachate has not been adequately assessed. The number of trains to Woodlawn per week needs to be assessed and the solutions provided to problems which might arise if there is a delay for any reason or if the number of empty containers do not arrive back at Fyshwick and the supply is inadequate for the daily compaction purposes.

[7] Waste transport to Woodlawn is unacceptable for a number of other reasons. It is unacceptable as it moves responsibility for ACT waste into another State. It does nothing to reduce landfilling as the Woodlawn facility would be expected, as a result, to fill to capacity sooner even if Mugga Lane had extended its lifetime. It also reduces the power produced in the ACT from methane and transfers that production to NSW at Woodlawn. It is not desirable to have household waste double handled or even triple handled as this proposal requires. The added costs of the proposal to waste collection, handling and to the ratepayers of the ACT need to be estimated. The EIS should have included a cost benefit analysis so that the community can see that its waste collection costs will not rise as a result of the development. Earlier NoWaste assessment of waste to Woodlawn in preference to the extension of Mugga was rejected due to the cost to the ACT. This is recorded in NI: 2014-153.

[8] The ACT government should consider the future capacity of Woodlawn over a long time period for accepting ACT waste to ensure a viable and long lasting waste solution for the ACT. Relevant also is the risk to NSW residents of having Woodlawn's life reduced by acceptance of ACT waste thus limiting the long term security of their waste disposal. The ACT government should also consider the legislative context of Woodlawn accepting our waste and the possibility that any consent given to them for this might be withdrawn by the NSW Government at any time. The Government should note that the EIS does not contain any contingency plans if this should happen.

[9] The security of our waste disposal is an important matter that needs more examination. Giving monopoly control of ACT waste into the hands of one private developer is not prudent and does not serve the public interest. It has the detrimental potential of reducing the incentive of citizens to avoid or recycle.

[10] There is a risk, not explored in the EIS, to ACT residents that if this development does not continue to operate over the long term they would face an immediate waste solution crisis and be exposed to higher costs for their waste services.

[11] The EIS fails to address the decommissioning timeframe and methods as required by the Scoping Document. Responsibility for any clean-up of the site after operation ceases should be guaranteed by a Bond.

[12] Rail transport also increases the potential for NSW waste to come to the Fyshwick site by rail to avoid the NSW waste levy for recycling prior to disposal. It makes little economic sense to have empty rolling stock returning to Fyshwick from Woodlawn or from Port Botany. The proponent must give assurances that this will not occur.

[13] Stage 2 of this proposal is for an incinerator; a feature which the residents have soundly rejected. Apart from this incinerator sourcing ACT waste where is the guarantee that we will not end up burning NSW waste?

Poor Site selection

[14] The plant is inappropriately sited. Consideration should be given to the potential for conflict between the development and the surrounding land use. It is recommended that waste transfer stations not be adjacent to a residential zone or other sensitive or non-compatible land use, and that a suitable 'separation distance' separates such uses from the depot. The ACT Environmental Protection Authority (EPA) Separation Distance Guidelines recommends a separation distance of at least 300m to the nearest sensitive land use.

[15] The East Lakes Urban Renewal development will be within that 300m buffer, particularly the high rise component. The odour and noise modelling did not take high rise into account and modelled for impacts at ground level. These are two of the most complained about issues for EP Agencies in any jurisdiction and to place unnecessarily, a major Waste Transfer station so close makes little common sense. The EIS dismisses the future East Lake development too easily.

A review of the East Lake Urban Renewal area from 2007 shows a potential mixed-use zone across the Monaro Highway (See Figure 20). This is approximately 300m from the proposed facility. Whilst this proposal is possible, there are no firm plans for development of this site from the ACT Government.

The ACT EPA released a Draft Separation Distance Guidelines for Air Emissions in November 2014. In this draft, it outlines that the separation distances from sensitive receptors should be a minimum of 300m for "Materials Recovery Facilities" and "Waste Transfer stations". This proposal achieves this.

ACTPLA has in two previous industrial developments proposed for Hume directed in the relevant Scoping Documents that the Separation Distance Guidelines be addressed by the proponents. Members of our community would have expected no less in this major waste project to be situated in Central Canberra. The dismissal contains no analysis of the nature of the development and the impacts that might be felt by its 9,000 residents considering the closest access to the Monaro Highway north is to use Ipswich St. The Traffic Impact Assessment should have considered this.

[16] Two other important developments should also be examined for impacts from this proposal; the Molonglo Group development of the Dairy Road which will bring

tourists and residents into the Fyshwick area and the development of the eastern side of Cessnock Street. These two future land uses should have been considered in the traffic assessment, odour assessment and air quality assessment and were not.

[17] CRS Scoping Application November 2017 makes it clear that this is stage 1 in a larger development plan. Page 3 states;

Capital Recycling Solutions Pty Ltd (CRS) has prepared this Scoping Application in accordance with the requirements of the ACT Planning and Environment Act, 2007 and is associated to the previous Application number 201700053 – Materials recovery facility and waste to energy (WtE) thermal conversion and emission control equipment.

This request for a separate EIS scoping document comes after extensive community consultation as part of the process for application number 20170002[5]3 which has influenced our approach to split the original proposal into its key components.

- 1 The Materials Recovery Facility and Rail Freight Terminal (MRF)*
- 2. The Waste to Energy facility (WtE)*

We consider the WtE facility ancillary to the overall solution in that it is dealing with residues from the MRF and does not impact on its effectiveness or viability. As such, we are proposing to proceed with an EIS process for the MRF only, with a separate EIS process to be undertaken for the WtE component at a later date.

This is a clear statement of future intent. That it was not considered in the EIS in relation to this development for adequacy of site selection is a significant weakness. The EIS should be sent back for this requirement to be completed.

[18] Stage 2 of the proponent's development should also have been assessed in the EIS for the potential it has to create cumulative adverse impacts on human health and the health of the environment. In spite of the proponent's verbal claims that he has no intention 'at present' to build an incinerator or Waste to Energy (WtE) as it is preferred to be called, his written Scoping Application and the two notifiable instruments for this development still include it. Therefore it is legally still current and since the Scoping Document was informed by the Scoping Application then we argue that legally it is an active component - Part 2 of the development and should have been assessed as part 5.1 of the Scoping Document required. This must be redressed in a revised EIS.

Inadequate block Size

[19] Consideration should be given to the capacity of the facility, users of the depot, and the processes to be undertaken at the depot when assessing the site. The proposal for the depot should also consider including an adequate area for potential expansion over the next 20 years, with at least enough area to accommodate the projected increase in waste and new technologies.

The Minister must question the land size for its adequacy for all elements of the proposal and any future development or improvements. (Scoping Application May 2017 pp 15), *in Addition to the proposed site there is the potential for further*

processing on the adjacent Access Recycling site in the future. The proponent does not own Block 13. Just a little more than 3ha in total Blocks 9 and 11 will be too small for the footprint of the buildings plus the rail hub and its associated infrastructures and the surrounding containment areas to allow for vehicle movements, construction and maintenance access and lay down and auxiliary equipment. There will be no buffer zone between this facility and its near neighbours retail and commercial.

[20] Besides the fact that the site is too small for all that needs to be constructed the total plant site needs to be much larger than the required building footprint to provide any buffer for spillages or impacts from accidents, fire or discharge and to allow sufficient land for truck movements, maintenance and other necessary activities.

[21] In extreme situations where adequate queuing space cannot be provided on the transfer station site, an additional offsite area can be provided as a holding area for waiting trucks. There is no provision in the EIS for this.

[22] There is no location of the waste water collection tanks which would be necessary for the leachate collection nor the route on the site of the vehicle movement of those trucks taking it away for treatment.

[23] There is no plan for accident and emergency response. How would the firefighting services access any of the facilities with so little room to manoeuvre. The site plan shows how congested it will be and allows nothing for growth/expansion or necessary modifications that might be needed in the future.

[24] There is no location for the office, administration building, educational research centre, the two weigh bridges or any of the other infrastructure which might be needed on site. The Scoping Document required that this be outlined in maps. It has not been. Concept drawings are no substitute for engineer or draftsman drawn maps or diagrams. This part of the EIS needs to be done again and re-exhibited. The A3 plans did not reduce well to A4 size and the AECOM results of soil and water testing and the site map showing the boreholes and their results could not be read even with a magnifying glass.

Site suitability

[25] The site is an old Shell depot for the receipt and distribution of diesel fuel. Years of use has left the site seriously contaminated. The EPA aims to minimise the risk of adverse impacts of contaminated land on the environment and human health so the site was audited by an accredited auditor and remediation deemed necessary.

The EIS does not discuss in detail the various remediation alternatives because the proponent prefers to "manage" the site. The Scoping Document should require an in depth discussion of the remediation option justifying the minimal action to be applied, in order to be able to assess whether management is an acceptable solution.

[26] No recent site analysis has occurred. The Site assessment offered in Appendix H was based on earlier and dated groundwater and soil testing. Those tests revealed Benzene, Toluene, Ethylbenzene, Xylene (BTEX) and other hydrocarbons at levels which greatly exceeded the standard criteria. This is very concerning. It also revealed the presence on site of an unknown black tarry substance in the car park

area and evidence of toxic firefighting foam. No further testing for these was done and should have been. The 2011 AECOM report stated that more analysis in the future would be required. For the community's assurance this should be addressed.

[27] The qualified Site Auditor appointed by the proponent and the Environmental Management Plan (EMP) submitted in this EIS gave the advice that a changed commercial or industrial use of this site was only suitable if the present site conditions were maintained. That meant that no disruption of the soil or groundwater should occur and that no building should take place until it was adequately remediated. This means of course that the proposal in its present form cannot proceed. The concern was that highly toxic benzene vapours, if they penetrated new buildings, could be harmful to the health of the workers inside.

The obvious conclusion is that a more detailed and up to date site assessment should be completed so that the "management" solutions offered in this EIS can be adequately validated.

[28] Because the contaminants on the site are toxic and present in significant concentration a vapour barrier is proposed to prevent intrusion of benzene and other hydrocarbons into the buildings endangering the health of the workers. However the exact type of barrier is not explained with any clarity and so its effectiveness cannot be assessed. Examples of its use in other comparable situations must be supplied along with its performance history and a description of its physical and mechanical properties.

[29] Most barriers or liners used in industry such as agriculture or mining or landfills eventually leak. The potential for this liner to also fail overtime and not to provide the protection it was planned for is high. In view of the use of the building as an MRF where there will be multiple machines shredding, shaking and compacting, the consequent vibration plus natural ground movement will cause shrinking of the liner at the edges, rips or tears, parting of seals, all of which means a lot of contaminant will get through. The omission to address in detail the inherent and site specific dangers associated with the use of this kind of liner must be rectified.

Too many unaddressed Traffic issues. On-site roads and vehicle staging

[30] For this development there are serious weaknesses in the design as it relates to traffic movement. From arrival of truck to departure there are several left or right hand turns. This is far from ideal and opens the site to potential minor or major collisions involving other users and the general public. It is most important to arrange buildings and roads on the site to eliminate or minimize intersections, the need to back up vehicles, and sharp turns. The fact that delivery traffic will enter both from Lithgow and Ipswich Streets, as advised by the proponent in a meeting on 17th May, increases the risk of an onsite collision and has the potential to slow the south bound traffic on Ipswich Street even more. This dangerous situation is exasperated because of the reduced sight line caused by the rise of the hill to the north over the railway line bridge and merging traffic coming from Barrier Street. It is unacceptable when we are considering a new development which was not necessary and certainly not suited for this site and where other sites were available.

[31] The associated car traffic of the public or visitors should, where practicable, be kept separate from the collection and transfer truck traffic. This is not the case with this development. Employee and visitor vehicles in the car park will have to cross the path of entering and exiting trucks.

It is not clear how access to and from the car park against the direction of the exiting and entering trucks will allow visitors to leave safely. This should have been addressed in the Traffic Impact Assessment. Traffic flow diagrams for car park intersection with the access road should have been included.

[32] Semi trailers and garbage trucks are difficult to manoeuvre and require gentle slopes and sufficient turning radii. Ideally, these vehicles should not have to reverse. Lack of scaled plans, as mentioned earlier, failed to demonstrate there is adequate room on site to guarantee road safety at all times.

[33] The roads should be appropriately constructed and maintained to allow for all weather access; kept clean at all times; designed to accommodate a variety of vehicle sizes, speeds and turning characteristics, and the carriageway should be designed for heavy traffic. Roads and receiving areas should be sealed with bitumen or concrete, or similar materials with low permeability. Unloading areas should be on level ground and provision should be made for the safe reversing of both light and heavy vehicles. Safety barriers should be installed at unloading areas. A straight approach to the weighbridge is recommended. The EIS failed to demonstrate this.

[34] The need to direct traffic flow in a one-way loop through the main transfer building and around the entire site should have been addressed. Facilities with one-way traffic flow have buildings (and sometimes entire sites) with separate entrances and exits. The EIS is already outdated as contrary to its Traffic study we are now advised that southbound trucks will be able to enter and exit the facility via Ipswich Street. This is to alleviate congestion in Wiluna and Lithgow Streets. The loss of the one direction loop for traffic movement on site presents a different set of site risks which now need to be assessed. The draft EIS has failed to eliminate sharp turns, intersection of traffic on the site and the need for vehicles to reverse.

[35] The site layout should ensure that there is adequate queuing space. Checking against observed traffic data for existing facilities should be conducted as part of the design process. This was not done. The EIS fails to provide space for vehicles to queue when the incoming traffic flow is greater than the facility's tipping area can accommodate. Sufficient queuing areas should be located.

[36] The EIS has failed to convince that road accidents involving waste trucks will not increase in the environment surrounding Ipswich Street as a direct result of the activity from this facility. Intersections and cross- traffic pose a danger. Accident risks on and off site have not been addressed in the risk assessment for this development and should have been.

Impacts on the Local Road Network

[37] Contrary to any public benefit the increased traffic in Fyshwick is not in the public interest rather a public nuisance. 230 trucks a day or 460 truck movements additional on Ipswich St is unacceptable. These movements are all concentrated around Ipswich Street, Newcastle Street and the north and south exits to and from the Monaro Highway. Road accidents in these intersections will increase. The

proponent seeks to dismiss the impact of the extra traffic and calls it “negligible”. He does this by averaging the truck movements over the hours of operation of the facility. However if one averages the garbage trucks over the hours of their operation instead of one truck every 4 minutes it is closer to two trucks. It would only take small delays along their route for the trucks to arrive in a procession and have to queue in either Wiluna Street or worse Ipswich Street. The impact this might have on other road users and on the commercial businesses along those streets has not been assessed.

[38] This community shares others’ doubts about the accuracy of the number of trucks stipulated. Far from clear is the number of trucks and their frequency which will access the site to remove the recyclable materials which cannot go to market by rail. Additionally the number of trucks that might be bringing unquantified waste metals to the site for transport by rail to Port Botany is also unclear. Additional truck movements associated with maintenance, hazardous waste removal, leachate or waste water removal, deliveries of fuel and other necessities and so on can be suspected. They should have been quantified as best as possible but notwithstanding that any additional increase cannot be supported.

[39] According to the EIS there will be 460 traffic movements on Ipswich Street from garbage trucks each day. As Canberra grows the scale of operation of the proposal will ultimately be much larger than described in this EIS. The proponent has failed to take into account future growth and should be asked to do so.

[40] Transfer stations often receive surges of traffic when collection vehicles have finished their routes. Transfer station traffic varies locally, but tends to peak twice a day. The first peak is often near the middle of the day or shift, and the second at the end of the day or shift. Therefore, the best sites for transfer stations are located away from areas that have midday traffic peaks and/or school bus and pedestrian traffic. A site visit in January confirmed that traffic on Ipswich Street at midday is heavy and noisy. The traffic study should be revised to consider alternate peak traffic periods in Fyshwick.

[41] Wiluna Street is on a bus route and the East Lake development preferred plan shows the bus route from there accessing Ipswich Street. The Traffic study did not consider bus routes and the impact of merging buses on waste trucks queuing in Wiluna Street.

[42] The Traffic impact report did not undertake separate intersection impact assessments for the Newcastle/Ipswich Street/Dairy Rd/Monaro Highway intersections where most of the additional traffic will be coming from and for the Canberra Avenue/Ipswich Street/Monaro Highway intersections. This should be advised in a revised EIS.

Air Safety Concerns

[43] Most wildlife strikes occur on and in the vicinity of airports, where aircraft fly at lower elevations. The risk of a strike on an airport relates to the level and form of wildlife activity both within the boundary of an airport and in surrounding areas. Wildlife attracted to land uses around airports can migrate onto the airport or across flight paths, increasing the risk of strikes. Airports actively reduce wildlife

populations and manage the risk of strikes on airport land. The proponent must address this.

[44] The International Civil Aviation Organisation (ICAO) has developed specific advice on land uses with the potential to become high risk wildlife attractions. These include food garbage disposal.

It is also essential that new land uses and changes to land zoning within 13 km of the airport property are regularly monitored and action plans created to mitigate any unacceptable increase in the risk of bird strike. For example, the ICAO document 'Airport Services Manual- Bird Control and Reduction' suggests that garbage dumps should not be sited within 13km of airport property. Air Safety Guideline C Attachment 1 lists waste transfer stations within 3 km of airports as "High Risk" and "Incompatible". Mitigation or monitoring is not listed as an option for new developments. The EIS has failed to address this issue. Existing Waste Transfer Stations and other food disposal activities in the vicinity of aerodromes need to demonstrate compliance with bird control measures in accordance with the requirements of the Civil Aviation Safety Authority (CASA).

All appropriate Air Safety Guidelines, especially Guideline C - Bird Strike, must be applied to this development and they were not. It is a serious omission in the EIS that no assessment was done on this development for its compatibility with the airport operations.

Canberra Aerodrome Masterplan places great emphasis on the danger of bird strike to planes landing and taking off and identifies a number of sites around it which are being monitored. In view of this concern a waste transfer station 2.5km from the centreline of the main runway deserves no less stringent scrutiny.

Unaddressed waste separating and handling issues

[45] The EIS inadequately deals with the discovery of unwanted and hazardous materials in the waste stream and supplies insufficient detail about their handling storage and eventual disposal. A Hazardous materials plan should be provided to include methods to identify and isolate hazardous materials, the temporary storage locations and methods, and emergency phone numbers. There was no plan.

[46] Precautions must be taken to avoid receipt of hazardous and dangerous wastes and then plant implemented for their proper handling and disposal. There must be separate handling procedures and separate storage areas for separating and containing contaminated waste found in the waste stream such as asbestos, batteries, tyres (if found), pesticides and other PCB type chemicals, paints, resins, chemicals or any substances prohibited from being discharged into the environment. The EIS must provide details of where and how these dangerous materials will be dealt with.

Odour

[47] Waste Transfer stations everywhere smell and are the subject of complaints. Even the state of the art VEOLIA facility at Banksmeadow has been the subject of

numerous complaints. Waste Transfer stations located in the middle of a busy commercial area are inadvisable. This proposal on this site is a potentially offensive industry because the closer the distance between the odour source and the receiver the more intolerable the impact of odour may be to the receptor.

Odour control is particularly difficult to achieve, monitor and regulate. This facility in particular needs a higher level of scrutiny because any adverse impacts it might cause will be irreversible by the fact that once established there will be no alternative waste disposal solution for the residents of the ACT with Fyshwick the established receival point for all of Canberra's Mugga waste.

[48] Greater scrutiny of this issue is supported by the fact that Municipal Solid Waste (MSW), food waste, and certain garden wastes such as grass have a high potential for odour generation. Odours might increase during warm or wet weather. The Odour study did not address seasonal climatic conditions.

[49] The EIS failed to evaluate the prevailing wind direction. Odour contours show the worst case scenario 2 affecting areas in a north-westerly direction but fail to show the area of affectation during times when the wind is blowing from that direction towards the south east.

[50] As an ameliorating technique the Air ventilation system needs to be tested and validated for the adequacy of effectiveness.

[51] There needs to be an estimation of the impact on odour emissions if the extraction/ventilation system fails or needs maintenance. There should be some back-up system in case of failure.

[52] The odour modelling did not demonstrate with any degree of certainty that the potential odour impact is less than the EPA odour criteria for normal conditions and other conditions including times of higher emissions from accident, power failure, equipment failure, unusual meteorological conditions or human error. This is essential because of the location. There must be no odour impacts on neighbouring businesses which have minimal buffer zones. The amelioration techniques must be validated for site specific efficiency.

[53] Rail transport is dependent upon the availability of adequate numbers of rail cars and containers and the ability of the railroad system to pick up and move the waste in a timely manner. Long delays before departure or along the route can result in odour problems. A shortage of empty containers at the facility has the potential to hold the waste longer on site thus increasing any odours. The EIS has failed to address the risk of filled waste containers sitting at the siding or in the shed for lengthy periods of time.

[54] The odour modelling only addressed the odour from the vent and from opening and closing doors. This is inadequate and must be redressed. Litter can also cause odour problems to near neighbours.

The Air Quality Impacts were ignored

[55] Appendix I Odour Impact Assessment is not a substitute for an Air Quality Study. Different science is involved. It is unacceptable to ask the community to accept this report as the only report that looks at the crucial air issues.

[56] There was no Air Quality Study in the EIS in spite of it being specifically required by the Scoping Document. There are several significant reasons why air quality is an issue for this development.

- a) The contaminated soil on blocks 9 and 11 which will be disturbed by the proposed development carrying toxic pollutants into the air.
- b) The number of extra trucks increasing the fine particulates into the air from the diesel exhaust. This is also of concern inside the building.
- c) The ventilation system in the shed is not filtered.
- d) Stage 2 ancillary to this development is for a WtE component and should be assessed for cumulative air impacts.
- e) The potential impact of the above issues on human health

[57] The stack plume must be assessed for the quality of its emissions which could include fine particulates, BTEX vapours, diesel fumes and pathogens created in the waste.

[58] The Air quality assessment should have provided base line data on the air of the surroundings to evaluate the impact of an added load of pollutants. This information should then have been used to inform a Health Impact Assessment in order to examine the kinds of diseases which might be exacerbated by any such addition. Many studies of health and pollution point to an incremental increase of hospitalisation and mortality with each measured increase of fine particulate emissions.

[59] Public interest and health protection demand that this Proposal not be approved unless a full Air Quality Study and Health Impact Assessment be done and resubmitted for public comment.

[60] Different types of systems are available to control air quality inside the building. The chosen one must be described and assessed for its suitability and effectiveness.

Some Transfer Stations use a piping system with an array of nozzles aimed to deliver a fine spray to the area where dust is likely to be generated in the tipping area. They typically are actuated by station staff "on demand" when dust is generated. Dust suppression systems can operate using water only or can have an injection system that are able to mix odour-neutralizing compounds (usually naturally occurring organic extracts) with the water. These dual purpose systems effectively control both dust and odours. Water-based dust suppression systems, however, can have adverse economic impacts. The additional moisture added to the waste increases the amount of leachate created and the weight of outbound loads, potentially reducing rail capacity and increasing costs.

It is unsatisfactory that the EIS did not consider alternate systems providing sufficient information about each alternative to allow evaluation.

Litter control

[61] Litter control needs more attention in this EIS. It is not treated seriously enough. It is unreasonable to expect the public to accept there will be no litter outside the shed on the say so of the developer. All practicable measures should be

taken to minimise litter generation and confine litter arising from the operation of the transfer station within the boundaries of the site.

Litter should be minimised by ensuring full containment at the depot. A litter collection program should be established to control wind-blown litter at the site. Simple things like covering bins and transport vehicles, checking the direction of the wind before mulching or crushing, and enclosing drop-off areas can minimise litter. Consider the direction of the main prevailing wind when designing the facility, and attempt to minimise the amount of wind-blown litter.

Daily litter inspections and pickups at the facility and on surrounding streets must be implemented. Litter should be collected at least once a day, more frequently if it becomes unsightly or a nuisance.

A perimeter fence should be installed to prevent windblown litter from leaving the site.

All incoming and outgoing loads must be covered.

All incoming and outgoing trucks must be leak proof to avoid leachate spills on public streets. The same should apply to the rail containers.

To prevent traffic litter acceleration, deceleration or turning lanes at the site entrances and exits must be controlled to maintain steady traffic flows around the facility. This may require widening the Ipswich Street entrance since trucks will now enter and exit through this road.

Where possible, all transfer station infrastructure should be designed to face a direction that provides the greatest protection against the prevailing winds. The doors on this building seem to be orientated to the east/south east from where summer winds generally blow.

Further, all litter should be cleared daily from within the site and outside the site boundary.

The EIS should be rewritten to give assurances that the litter control meets the above standards.

Noise

[62] The transfer station loading and unloading and compacting; the MRF equipment, the air ventilation engine, the traffic movement braking and reversing alarms and the train noise along with the noise generated from neighbouring industries was not assessed for cumulative impact. This must be redressed.

[63] Apart from an acoustic wall on the southern side noise attenuation measures are not properly addressed. It is merely suggested that dampening kits might be used on equipment and nothing is said about the construction of the building to make it noise proof. The principal way to reduce the effects of high-decibel noise in enclosed tipping areas is to apply a sound- absorbing finish over some ceiling and wall surface areas. Typically, spray-on acoustical coatings are used.

[64] Noise sources associated with the operation of trains include wheel squeal, flanging and idling. The design of locomotives makes it necessary to leave them running (idling) if they are to be stationary for a period of time. Noise from idling is

associated with diesel freight locomotives when stationary at passing loops or rail yards and therefore in this instance has the potential to have an adverse impact on the surrounding amenity. Rail noise should have been considered in a cumulative noise impact assessment.

Leachate Management

[65] When runoff contacts waste, it is considered potentially contaminated and is known as "leachate." Rainfall and wash-down water flows from roofs, roads, parking lots, and landscaped areas at a transfer station, eventually reaching natural or constructed storm water drainage systems. Runoff might also percolate into the ground-water system. Keeping surface water free of runoff contamination from waste, mud, and fuel and oil that drips from vehicles is important to maintaining the quality of both the surface and ground water systems.

Transfer station design and operation should ensure that contaminated water is collected separately, then properly managed on site or disposed of safely. The EIS has failed to adequately ensure that water falling in the waste storage areas does not leave the site untreated. There must be more details about the design of storage areas for liquid wastes as a result of spills or leachate creation.

[66] The management system for the transfer station is not clearly described in this EIS. There is inconsistency in the height of the bund to collect leachate on both tipping areas. The Text Volume 1 says it is 150mm while the diagrams show it as 2m. This is a huge discrepancy which must be explained.

[67] Both the 150mm option and the 2m option must be examined for their capacity and effectiveness and any other proposed choice similarly evaluated.

[68] Cover systems for the bunds need to be addressed to prevent spilled leachates from entering the environment and the sewer system in particular.

[69] The slope of the floor and how it will channel the leachate into each of those bunds needs further explanation since the bunds are orientated differently.

[70] How the leachate moves from the bonded areas into storage tanks also needs explanation especially the location of the tank.

[71] The method of removal from the tank into the rail containers, if re-injection is a preferred disposal method, needs explanation since the collection points of the leachate and the compactors are at different ends of the buildings.

[72] The wheel wash water should be treated as leachate and removed to the leachate collection tank for offsite disposal. There should be wheel wash facilities at each of the two container doors. This was not addressed in the EIS.

[73] A 20,000L capacity tank is judged as sufficient but it is not clear if that capacity was calculated including wheel wash and any storm water entering the shed. This must be clearly explained.

[74] If the leachate tank proves to be of insufficient volume and fills to capacity there should be an additional tank for the overflow. The EIS must give this assurance.

[75] Other design and operation measures to consider in managing surface water quality include limiting outside parking of loaded containers or alternatively using rain-tight, leak-tight containers. If loaded containers or transfer vehicles are parked or stored outside, providing catch basins for any leachate created outside the shed is a necessity. The EIS must address this.

Stormwater Management

[76] The EIS needs to describe in more detail the designed stormwater drains, sumps and first flush systems to prevent stormwater runoff from entering the active waste disposal and resource recovery area.

[77] The EIS has failed to take into sufficient account the Jerrabomberra Wetlands Management Plans and the Jerrabomberra Creek rehabilitation project. The Jerrabomberra Wetlands Management Plan acknowledges the potential for impact on the wetlands as a result of surrounding land uses and impacts on water quality from urban and rural runoff. Monitoring has shown that much of the water and riparian quality of Jerrabomberra Creek is degraded. This may be related to a range of land management practices in the Jerrabomberra Creek catchment and from the effects of urban stormwater runoff. Significant exceedances of standards occurred during large storm events, when sediments and nutrients moved across the catchment and were transported into and through the drainage system. Since there is inadequate undisturbed and rehabilitated or revegetated areas on the site to act as filters for sediment a more robust sediment control system should have been designed. Hay bales with iron stakes are not durable and will not do the job over a long time frame.

[78] As stated earlier in this submission a recycling facility will find a percentage of rogue wastes in the waste stream and will have to separate them out and deal with them appropriately. However, there is the potential that some of the residue of those wastes if liquid or other could find their way onto the floor or be spilled elsewhere and become an environmental risk at the site. The risk that this poses to the stormwater and sewerage systems has not been thoroughly investigated.

[79] There is a high potential for stormwater to enter the sewerage system and the adequacy of proposed stormwater controls, waste minimisation and water conservation programs and the adequacy of any contingency plans if things go wrong, errors or failures of systems occur must be assessed in more detail.

Hazards and Risks

[80] The Draft EIS fails to consider adequately and comprehensively the hazards and risks of this proposal. While considering the bushfire risk it omits the risk of fire on site and fails to mention in its discussion of environmental history that both Access Recycling and Benedict Industries have had some recent serious fires in their businesses.

Landfill fires and fire in recycling facilities and transfer stations are widespread. The transport and receipt of hot waste loads is an extreme high risk for waste transfer stations. By its very nature, waste is potentially flammable.

Fire or explosion can occur for a number of reasons e.g. fire from adjacent sites; fire in the waste trucks entering the site caused by hot material brought in with the waste, or through spontaneous combustion of volatile material in the waste; or fire initiated on-site by vehicle accident, equipment or by discarded matches or naked flames. There could also be electrical faults or chemical causes. Waste is potentially flammable, so everyone needs to be trained in fire safety. Waste fires as a hazard and risk must be dealt with in the EIS.

[81] Other key hazards and risks for the Proposal include spills, either liquid or solid, for example bursting hydraulic oils and potential loss of putrescible loads. Non-conforming waste, including the receipt of dangerous goods/hazardous substances at the site, if not properly identified or contained, can also result in adverse spills escaping to the environment. How this is to be prevented requires a more detailed analysis.

[82] Nor is the risk of accidents and those associated with occupational health issues on a contaminated site adequately dealt with. This must also be addressed.

[83] Disruption of operations, equipment failure and structural damage to the terminal building as a result of accidents due to the operation of trucks and heavy machinery within the building have not been assessed in the EIS Risk Assessment and should have been. This must be addressed as must all other possible risks to the disruption of operations.

[84] Potential hazards to the environment and public health have been identified in relation to the contaminated site and health and respiratory pollution as a result of dusty loads and diesel emission were not addressed in the risk assessment.

[85] Traffic accidents resulting from the interaction between heavy garbage and delivery vehicles with other road users was not addressed.

Throughout the consultation and presentation process the proponent has continually maintained that many of these issues are to be addressed at the construction stage or for inclusion in future DAs. However, ONCC notes that Government advice states; *The EIS must include sufficient information to ensure that all environmental, social and economic impacts associated with the proposal have been identified and assessed, and any adverse impacts are avoided, minimised, mitigated or as a last resort, offset.*

In conclusion the ONCC submits that there are too many uncertainties and unaddressed issues to allow the Minister to accept this Draft as a satisfactory EIS.

This is the wrong solution in the wrong location.

The proposal should be rejected.

Old Narrabundah Community Council
Serving the Community

Web: www.narrabundah.org.au

26th June 2018