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Quarry submission

I object to proposal as it stands and make the following points of objection and questions

That one of the Modification proposals was not advertised in the listed proposed changes .

2.1.2. pg 31 EA no 6 Separation and sale of clay which occurs as lenses within the sand resource

This statement number 6 under the heading “ The Proposal provides for the following modifications to Quarry Site and transport operations.”

Is not mentioned NOR advertised in the list of modifications proposed for the Quarry .Why not?

There are implications to the water use and the methods of separation of this product ;

Is there more machinery proposed for this operation ? If so what ?

Will separation of clay + stockpiling? increase the length of time before water can be re-cycled/re-used in the operations ?

Is this material to be harvested from silt ponds ? How will that affect their integrity ?

4.1.2.1.pg7 Water management plan . “sediment storage volumes identified in Table 1.1. This will require markers to indicate when their capacities are reached. When they are reached trapped sediment will be removed and used as part of final landform creation and rehabilitation.” This would seem to indicate that the trapped sediments already have a purpose in the Quarry operations as shown in

4.1.2.3. “If necessary it may be stored in stockpiles that drain back toward a sediment basin.”

What is the purpose of selling the clay ? so far the Modification has only spoken in terms of the Roadbuilding ,Building and construction industries and has been silent on clay . Would it be classified as ENM?

Why not keep the clay if it is clean , for re lining the ponds to prevent seepage from harvesting or rain event damage or for supporting the structure of the bunds and so be effectively used to take the place of the intended imports of ENM with its expected contaminations ?

P 165/170 EA the objects of the EPA act are listed as

a) i) indicates that the CONSERVATION of Water and a “better environment “ are two key elements

The executive summary (p19) under the heading Water, makes no mention of the increased water allocation and use to 210 ML . As discussed in the public meeting Bungonia Feb 12 2018

MULTIQUIP QUARRIES - 4 - WATER MANAGEMENT PLAN Ardmore Park Quarry Report No. 625/08 R. W. CORKERY & CO. PTY. LIMITED 3.1.3 Water Use Water will be used at the quarry for the following purposes and at the estimated rates. • Dust Suppression (on roads, hardstands etc.). The estimated use is approximately 20 to 22 ML/year and will depend on prevailing weather conditions. • Sand Washing. Multiquip estimates that approximately 700L of water will be required to wash every tonne of sand. However, between 50% and 75% of the total volume of water added will be recovered and available for re-use. The more sand that is processed, the better the recovery percentage expected. Therefore, total net use is estimated at: - 35ML/year at a production rate of 100,000 tonnes per year; and - 70ML/year at a production rate of 400,000 tonnes per year • Domestic use in the administration buildings. Estimated use is 1kL/day (0.37ML/year).

In summary, the expected annual water demand will be between 57ML/year and 92ML/year, depending on washed-sand production. Much of this will be drawn from the re-use and clarifying ponds with the shortfall sourced from the bore (Section 3.1.4.4).

Q. Why would there be any change of the 100ML allocation already provided to the Quarry ?

Reference to R. W. CORKERY & CO. PTY. LIMITED

Table 18 Sediment Basins, **Re-use Ponds** and Clarifying Ponds Reference1 Stage Total Volume (ML) Design Methodology Management Method **SB1 Not yet required** 0.3 Type C basin2 Self-draining, pumped and/or overtopping SB2 Operations 0.9 SB3 Operations 1.4 SB4a / SB4b Establishment 1.6 Type D basin2 **Capacity returned within 5 days of design rainfall event**3 SB5 Establishment 0.4 SB6 Establishment 0.9 Operations 1.6 RE1 Establishment 2.8 **Harvestable Right Storage Reuse and/or overtopping RE2 Operational** 4.6 CP1 Establishment 1.6 Type D2 basin & Harvestable Right Storage Capacity returned within 5 days of design rainfall event3 CP2 **Establishment Not required** CP3 Operational 21 Note 1: Refer to Figures 18 and 19 Note 2: As described by the Blue Book Landcom (2004) Note 3: 5-day 95th percentile rainfall event

Searched for 2005-2018 ; Summary statistics for all years

Move mouse over highest daily rainfall to view dates.

Statistic	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Mean	66.2	63.8	65.2	51.8	48.3	61.0	42.3	45.2	46.2	55.0	57.8	60.2
Median	55.0	49.5	49.3	41.8	29.6	38.6	33.3	34.6	39.5	45.8	53.8	49.0
Highest Daily	114.325th 1885	149.917th 1928	114.015th 1989	76.030th 1988	167.111th 1925	117.825th 2013	135.626th 1922	93.228th 1974	83.36th 1967	143.331st 1969	80.019th 1986	135.95th 1911

[Plot statistics and this year](#)

Data within the table which are in *italics* represent observations which have not been fully quality controlled, a process which may take a number of months to complete. While these data may be correct, you should exercise caution in their use. For observations of daily rainfall which span more than one day it indicates that there is some uncertainty associated with the exact date on which the daily rainfall occurred.

Gaps occur in the table where a valid observation is not available. This is frequently associated with the observer being unavailable (where observations are undertaken manually), a failure in the observing equipment, or when an event has produced suspect data.

Product Code: IDCJAC0009 reference: 35424824[top](#)

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Highest Daily	22.8	13.6	53.8	8.6	20.0	9.8	4.6	13.4	11.6	8.8	26.6	21.0
Monthly Total	39.6	49.5	163.6	22.0	23.6	18.2	7.6	38.0	14.6	36.8	87.8	42.0

Annual total for 2017 = 543.3 mm

We note that the re-use/re-cycling ponds and other harvestable rights ponds are “not yet required”.

Question ;Where is the currently used operational water coming from ? is it being pumped up ?

Why is there no re-use yet of the water allocation of 110 and an attempt to double this water allocation . Re. Water in the existing allocation being lost (basalt dams do not effectively hold water). The quarry has not indicated its support for the environment by lining the dams to enable them to retain the maximum towards their operations’ requirements .

We note that in 2018 when the environment here is experiencing less rainfall from the EIS presented in the original application 2005 see above table .

In 7.2.2.2 The Quarry proponent quotes

The precautionary principle "where there are threats of serious or irreversible environmental damage, lack of full scientific certainty should NOT (my capitals) be used as a reason for postponing measures to prevent environmental degradation”.

This suggests that the Quarry accepts that the full responsibility to ensure no harm will happen from its activities..

However unfortunately the statement “With the exception of the depletion of sand and basalt, it is considered that there are **no features** (my enhancement) of the local environment that would be irreversibly or unacceptably damaged.” Ignores completely the impact of the doubling of water resources 110ML up now to 210 ML p111 EA 5.7.3.5 drawn from the Plateau water supply , to be used up annually on these operations;

EA Table 17 Water Quality Objectives, Targets, Priorities, Actions and Responses;

- Practices that maintain or improve groundwater. Source: SEEC (2017) – Table 1 How is a 210ML allocation diverted from agricultural and other use lands [bought allocations] in the plateau –achieving either of these required outcomes?

Given that rainfall predictions are increasingly unreliable in this period of ‘climate change’ this statement Site Auditing ;Water Management Plan p11. “Results of an inspection of the volumes of water collected in Dam 8 and RE2 after rainfall events (for model calibration – Section 3.1.1)12. And the note that “ 12; Subject to rainfall, this will only be required for two years” may be too soon to stop monitoring .

I would suggest reviews would be necessary on a long term basis eg every 5 years over the 30 years or the life of the quarry --- particularly as this action clause depends on the data modelled in this way – “The models actually predict increases in flow post development in mean or wet periods. If necessary, the permissible re-use volumes given in Column 6, Table 1.1 will be adjusted subject to site-specific calibration of the models (Section 3.1.1)” Models Always need good data to provide reliable information .

There is lack of transparency over the Actual Hours of operation p 17 EA as described:-

Quoted; “An increase in hours of operation for product loading and transportation. Multiquip is proposing transportation hours of 5:00am to 10:00pm, Monday to Friday and 5:00am to 5:00pm on Saturday to allow for an increase in the distribution of truck movements throughout the day”

This does not explain the actual hours that the Quarry operations will commence ;

It does NOT explain whether other Quarry related vehicle movements -deliveries etc or internal movement of materials /constructions etc by any other vehicles and or contractors who will haul products which are NOT the “state of the art dedicated Quarry trucks owned by Multiquip – will be moving into/around the site.

EA Pg 24 “Then, after receiving enquiries from local businesses and industry, Multiquip sought and received approval to supply up to 20 000t of quarry products to these operators via local roads.” ... A small volume, up to 20 000t, **may** be transported via local roads to supply local customers. Corkery Note1 on P5 “As approved by PA 07_0155 Mod 2. This transport may be undertaken independent of transport route upgrade requirements.”

P15 2.3.2. “In response to potential customer enquiries, Multiquip proposes to establish a bitumen pre-coating plant (Pre-coat Plant) to provide road sealing products for use on local roads”.

Because the quarry suggested that this product will be made and loaded freshly into trucks for transport , so how early will this part of the operation be ? and what impact will it have on the people living and trying to sleep within the noise zone ? The winter atmospheric inversion layers may also have a measurable effect on the transmission of noise and possibly also smells from the site.

Are these operations also regulated under the extractive industry , or considered as ancillary , and separate and potentially not regulated under the conditions relating to the Haul road ?

2.3.1 p 35 EA “The rate of production would increase to produce the proposed 580 000tpa, however, this increase would be achieved through additional utilisation of the approved mobile equipment within the hours of operation approved for processing operations.”

Because there are proposed back haul loads the actual loads on the roads will be closer to doubled for each truck as both forward and return trips would carry 50 Tonnes.

The quarry also indicates that there is a 24 hour a day allowance to do various aspects of their operations ; this is very confusing .

What exactly are the hours of operations ? How do they differ from the hours of Transportation .?

Q. How are these operations times and movements monitored and regulated?

Bitumen pre-coater impacts from the machinery noise ,especially as the quarry suggests that 20,000 tonnes will be the expected output per year the impacts should be considered . A further Diesel generator ,the crushing plant and conveyor belt operation with material rushing along chutes, loaded and unloaded as the aggregates of varying sizes will produce a new sound profile .What soundproofing is to be provided for this equipment ?and for this additional processing operation ?

My understanding is that, according to the current Conditions of Consent, The existing crusher unit was supposed to be enclosed in a sound proof building .To my knowledge this has not happened , yet tonnes of rock product has been crushed and trucked out of the site already .

Relating to the stockpiled treated bitumen ;there is no indication of how the integrity of the piles will be maintained against leechates and degradation ;The Quarry suggests with reference to “the coated aggregates forming a stockpile below the chute. The stockpiled aggregates would generally be loaded directly to trucks for delivery to road maintenance or construction projects.” This expectation does not account for the considered management of material when the ‘general’ does not occur nor when stockpiling may be necessary .What will happen then?

The extended transportation hours are excessive for the Quarry haul trucks noting that Murrumbateman, another rural/regional area, has successfully limited the hours of transportation to those close to the current Conditions of Consent for this Quarry .

Ardmore Park Quarry operations are currently limited to 7:00am to 6:00pm Monday to Friday and 7:00am to 1:00pm Saturday.

Local quarries here have haul roads for their operations . the Destination for the road is the Quarry – and the roads for eg Holcim and Boral are not used by any through traffic at all . Ardmore park is situated on a through road from the highlands to the coast ; it is in a rural residential area which experiences pulses of recreational traffic and weekend increases.Longer haul hours through areas of increased population will impact on the local use of the road system ,and amenity of the residents -we note the New subdivisions on Fisher road; Tickner Valley Road the Prairie Oaks Road ,the activities of the Driver training school [which Multiquip has recently purchased] the Monastery and the large number of infil dwellings on land unoccupied in the original assessment of “Receivers along the route” Jerrara Rd and along Oallen Ford Road in 2005 . .

All of these conditions are major reasons why these extended hours are excessive and not acceptable neither for residents nor other road users .

Q. I am not aware of any follow up of household numbers and population counts of those now living along the route [including Oallen Ford Rd] and its feeder roads since that application .

Q Has the proponent undertaken any such measured re-assessment of the impacts on the “receiver” local population?

Q Has the proponent undertaken any updated traffic counts to would assist realistic assessment of the traffic levels now in 2018 and their impact on the haul roads ? We note high concentrations of motorbike riders on weekends and touring caravans together with horse trailers, routinely passing through the area since the new bridge works over the Shoalhaven river.We can assume higher vehicle numbers of all types sharing the haul route , which would reflect Major access changes with the opening of Route 92 to the Coast (2016) There has been a major influx into the local population [9 new subdivisions ;constant new houses and neighbours ,] since those original counts 2005 and an inconclusive count in 2008.? The last one was given as 2013 taken over one single day and copying exactly the previous numbers . Surely this information is seriously dated and irrelevant ; particularly as all the noise assessments are built on wishful “projections” on those figures .We note high concentrations of motorbike riders on

weekends and touring caravans together with horse trailers, routinely passing through the area since the new bridge works over the Shoalhaven river.

As part of the **previous consent Lighting Emissions 35**. The Proponent shall: (a) take all practicable measures to mitigate off-site lighting impacts from the project; and (b) ensure that all external lighting associated with the project complies with Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting, to the satisfaction of the Director-General.

How is the light spill going to be managed from the convoys of trucks in the night , both on the haul route and the concentration of light and activity on site in the dark of night .?

Will all the extreme transportation hours also apply to the “local Deliveries “ category of transportation ??and to all the local roads in the district?

S94 contributions; the Quarry wishes for “Inclusion of a **conditional clause to allow for Multiquip** to enter into a Voluntary Planning Agreement (VPA) with Goulburn Mulwaree Council which **would replace the nominated Section 94 Contributions**.

I am opposed to any particular arrangements with Multiquip that is not also available to other Quarries in the region. Section 94 contributions are designed to allow for an increase in revenue over time if a business increases its road use ; and -logically- to reduce if the haul movements are not made . These measures see below(summary) are set and regulated across the GMC area to account for the extra impact of the haulage use of the roads; The Council manages these funds towards the best interests of Council ratepayers. Ratepayers can approach the council with their local interests to be met.

Given the Council determinations below Any VPA agreement would seem to be a major not a minor change.

Ref Goulburn Mulwaree Council

The Plan also applies to any applications relating to extractive industries, mines and other heavy vehicle haulage developments anywhere within the LGA due to the road pavement deterioration associated with heavy vehicles servicing such operations.

For Council to levy contributions, there must be a clear nexus between the proposed development and the need for the public service or amenity for which the levy is being required, as detailed in the provisions of the Plan.

Amendment No. 3

On the 7 June 2016, Council approved s94 Amendment No. 3 which became effective on 23 June 2016. The purpose of Amendment No. 3 was to amend Goulburn Mulwaree Section 94 Contributions Plan 2009 to:

- Update the cents per tonne per kilometre rate for heavy haulage development to 4.62 cents
- Specify that the indexation of contributions for heavy haulage development is to be based on the Producer Price Index
- Specify that contributions for heavy haulage development can be levied on the basis of either the mass of haulage material (in tonnes) transported to or from the site (where verifiable tonnage receipts can be provided) or the number of laden equivalent standard axles (ESAs) generated by the development
- Make minor corrections and administrative changes

These arrangements would seem to me to be fair and reasonable.

Re; Road Surface and Maintenance ref Pg 28 EA 2018

What is the detail provided on following :-

The proponent Quotes the intention to • Rehabilitate existing pavement to provide for pavement life >10 years.

What is the impact on the life of the pavement of the increased daily total of movements;

And the interval times moving closer together and over longer times?

What is the impact on the life of the pavement of the increased individual axle weights ?

Does this element relate to the entire driveable surface or only the edges and new work completed by the contractors to the Quarry ?

How has the currently existing relict life of the road surface been determined?

Does the independent traffic count (date?) take into account the increase of those vehicles other than the identified haulage truck movements as allowed by the existing conditions of consent??

What impact will the ambient temperature have on quarry truck haul operations as the asphalt surface softens in high summer and the extra traction forces by increased and more frequent heavier loads ? At what point will the assessed risk of severe road surface damage, trigger a temporary halt to truck and associated heavy vehicle movements ?

I Object to importation of ENM

The EA summary says the Quarry wishes to import ENM ;

This is a QUALITATIVE difference from the original application and consents which provided for VENM .

ENM Google search for definition gives;_ **Excavated Natural Material** (ENM) is naturally occurring rock and soil (including **materials** such as sandstone, shale, clay and soil) that has: a) Been **excavated** from the ground b) Contains at least 98 per cent (by weight) **natural material** c) Does not meet the **definition** of Virgin **Excavated Natural Material** (VENM).

Virgin Excavated Natural Material. (VENM). Definition. VENM is natural material: • That has been excavated or quarried **from areas that are not contaminated with manufactured chemicals or process residues, as a result of industrial, commercial, mining or agricultural activities.** • **That does not contain sulphidic ores or soils.** www.rms.nsw.gov.au/.../about/.../env-fact-sheet-1-virgin-excavated-natural-material.p...

We note :-

Legal offsite disposal of Roads and Maritime Services waste Summary: Audience: A duly completed and signed notice under section 143(3A) of the Protection of the Environment Operations Act 1997 (NSW) ("POEO Act") ("s.143 Notice") must be received by either Roads and Maritime Services (Roads and Maritime) **or its contractors prior to transporting project waste generated by or for Roads and Maritime to a place that is not owned by Roads and Maritime and is not a licensed landfill or resource recovery facility. Roads and Maritime and its contractors must ensure that such waste is appropriately classified and correctly described on the s.143 Notice.** Roads and Maritime staff and contractors What activities are within the scope of this direction? This environmental direction applies to project waste generated by or for Roads and Maritime and transported to places that are not owned by Roads and Maritime and **not a licensed waste facility** (the "Waste Site"). This includes waste transported for reuse, recycling, disposal, or stockpiling. Common project waste within the scope of this direction include materials such as spoil, fill, **Virgin Excavated Natural Material (VENM), Excavated Natural Material (ENM), crushed rock, reclaimed asphalt pavement, mulched vegetation, waste concrete, and bridge demolition/maintenance waste.**

There is confusion in the document

- "Importation of VENM to provide additional material to backfill completed sections of the extraction area and enable the creation of a final landform with an elevation and slopes consistent with those of the pre-Project environment.
- Progressive rehabilitation of the final landform through final profiling, soil replacement and revegetation with both pasture and native woodland vegetation."

EA 27.5 p44 Imported VENM and ENM will be unloaded on the quarry floor and a bulldozer used to profile this material into the proposed final landform. Progressively greater volumes of VENM and ENM will be unloaded and spread.

Would any ENM require composting or any other treatment before being used as specific product for sale ;or used in bunding ?

The importation of VENM [as per original consent] should in my opinion be the only type allowed given that:-

- 1/ The Quarry is on a plateau; Unless scientifically proven to be otherwise , we assume that the water resource is a single definable resource to be shared equitably and managed sustainably ,now and in the future between all users.
- 2/The potential for Ground water contamination is high with ENM as the source material is NOT CERTIFIED AS UNCONTAMINATED ;continued amounts will be added over a long time increasing the potential impact of any contaminants.
- 3/the groundwater is a fragile and vital survival resource to the plateau communities , facing as we all are, significant climate change and reductions both in reliability and predicted rainfall.
- 4/ the Quarry site has vegetation corridor link options close to the bio-diversity of the Morton National Park, necessitating careful and sustainable re-vegetation that will depend on a non contaminated site for best chance of success.

Unfortunately the highest \$ value would be placed on contaminated products because they are the most difficult to re-locate. However this should not be the main consideration given that Multiquip undoubtedly would wish to follow best Environmental principles and follow their support of the Precautionary Principle in this matter.

Q. What oversight or monitoring of actual loads is provided for, apart from the usual Self-Regulation -especially in relation to unknown soil contaminants ?

Loss of existing natural soil resource

Q. How does the EXPORT of prime Basalt soil [a separated inherited limited approval] rather than its conservation on the site ,lead towards a successful rehabilitation of the Quarry site over time??.

The introduced materials VENM will have few of the environmental qualities needed to successfully re-introduce bio-diversity sufficient to reconnect the degraded site to the remnant forest Yellow Box/ Red gum. This is a sensitive & endangered ecological community under the EPBC Act and part of the Corridors into the Morton National Park . t is immediately adjoining the Quarry Southern boundary .

Ref Corridors and connectivity Office of Environment and Heritage. Conservation Notes P1

“To restore landscape connectivity, many revegetation projects in recent decades have aimed not only to increase the area of habitat but to also re-link isolated natural areas with corridors.” ...Tips :Mimic the composition and structure of healthy local vegetation. New corridors should use local native plant species. This is particularly important in enabling corridors to become habitat, especially in extensively cleared areas where little of the indigenous vegetation remains. Plantings should have a similar structure to reference sites or benchmarks for the vegetation type. The local catchment management authority (CMA) can provide information.”

This suggests that the introduction of foreign soil material [VENM] , rather than retention of the available superior local naturally occurring soil, together with its biome , would make any re-habilitation of the site more problematic ,especially in the harsher climate conditions expected for the next 30 years. ENM is out of the question.

It is a backward step for the community to be expected to accept all the impacts for extra 8 years.

Repeated Modification to consents/conditions etc will undoubtedly also impact on the community over this extra time. Consent for the Quarry was given 7 August 2009 for 30 years resulting in a Quarry completion and Decommissioning date would be 2039 ; which is what the Community expects for the Quarry duration .

- Condition 5. Is Presented as an administrative element

“Multiquip is also seeking modification to the wording of several of the administrative conditions of Schedule 2 . Resetting the 30-year approval period to commence 1 July 2017, extending the limit of the approval to 30 June 2047”

This “re-setting – of the dates is Confusingly presented.

There will be another 8 years of impacts still causing difficulties for residents. The capacity of the Quarry to make profit for the proponent was originally assessed with the time frames requested and , presumably , all the research was done to back their business decision to proceed. All the commercial risk assessments would also have been done .Multiquip continues to present its positive business outlook and enquiries etc leading to further modifications (100K local deliveries) and bitumen precoating plant (currently applied for).It has permission for heavier loads reducing its unit costs and is asking for extended hours to bulk up deliveries . Multiquip presents itself as already having a profitable future .

Why therefore does it need more years?

2.4.3. “This flexibility in scheduling of truck movements would be further enhanced by the ability of Multiquip to hold laden trucks at the Quarry Site over night and despatch these on commencing the next day.”

Is the loading of these trucks to be accomplished within the Transportation hours ? or is there going to be “operational time which will take the noise and movement and lights past Midnight and/ or commence well before Dawn ?

Before setting off, will the diesel trucks require the cabins be warmed for driver comfort and performance ,assist frost removal, iced up windows, with their diesel engines all turned over idling for a measurable period of time to accommodate the low temperatures in this district . Goulburn had a recorded Minus 10.4 degrees this last winter ; our place had Minus 13.2.

This measure (2.4.3.) would majorly increase the impact of the truck movements especially when residents are asleep in the morning or at night ; a CONVOY of trucks at 5am in the morning ;a convoy condensed into a few hours in the late evening 1/ dramatically increases the risk of road damage ,due to intensity and frequency of their passage and the cumulative weight naturally leading to corrugations in the road surface 2/ increases the likelihood of wildlife deaths ;3/increases the risk of small vehicle related accidents. It also increases the amount and changes type of noise from transportation in a convoy ;noise that is magnified in effect by being generated in the landscape .

Such a convoy also presents a massive visual and auditory impact far beyond individual truck movements. The worst impacts would be light and engine noise particularly at the sensitive intersections Oallen Ford road and Mountain Ash road ,where multiple heavily laden vehicles flashing lights and full headlights ,early in the morning and late at night will be squealing ,exhaust braking, changing gears ,and grinding up or down the inclines and echoing in the valley . That noise travels huge distances in a quiet rural night scape. No-one should have to endure that until 2047.

2.8.2. Transport operations ; Initially Multiquip proposed to extend transport hours of operation to 24 hours Monday to Saturday. 24 hour transportation is an unwarrantable impost on the community .The site is not a stand-alone site; Community residents and activities lie within its impact zone .Nor is it a historically developed resource with unique agreements in place .

“evening hours (6:00pm to 10:00pm). Multiquip has been active in emphasising that transport during these hours would be restricted as far as possible” stacking loaded trucks into convoys in the night hours and setting them out in the early dawn are not beneficial to the sleep and lifestyle amenity of those impacted neighbours both next door to the quarry ,on the route and within any of the noise and light pollution zones.

2.4.2 pg 37 “Multiquip proposes to use 4-Axle Truck and 5-Axle Dog Trailer vehicles with a pay load of 50.3t (see Appendix 5)delivery of all quarry products (including clay materials) and importation of VENM or ENM.”

How is cross contamination between products to be avoided if VENM and ENM are to use the same vehicles?

The EA does not say Contractors are required to have the same standards of vehicle. How can the safety and other considerations so important to the Quarry management be adhered to if part of the transportation is outside their control and monitoring .?

2.5.3.2. “ENM screened and blended with Quarry materials to produce a specialty product” This sounds as if damaged and contaminated materials will become saleable ; the previous stated purpose in the EA has been to provide for site filling, bunding , and re-habilitation .

What exact source material is intended to be imported specifically to be blended with Quarry products for sale?

What management plan is in place for stockpiles and handling of such material?

Wherein the EA is the information on this extra business activity proposed for the site?

It seems as if the purpose of this site is to be a waste facility.

If not-- why ask for ENM which is contaminated materials. There is a statement in the justification that the ground will be returned to agriculture after the quarry is finished; having sold off the good topsoil and the quarry clay ,rock , and sand all replaced with waste – exactly what agriculture is suggested for this contaminated land?

2.8.5. “After reviewing these concerns, and on identifying an opportunity to undertake the concrete batching operations at a site within Goulburn (subject to separate development approval),”

Is the transportation of the high volume materials to Goulburn considered to be part of the “local deliveries” and possibly using Mountain Ash Rd ?? or is this component of Quarry operations to be considered as part of the Quarry products which should be transported on the designated Quarry Haul route ??

With the inclusion of a bitumen coating plant and a clay/specialised product creation there are justifiable reasons for being concerned that this changing into a multi use industrial site rather than an extractive industry .

4.2.2.3 Consultation methods

The proponent reports success in all public relations, outlines gifts and points to the quarry’s overwhelming presence in the Progress Association and in community events. The Quarry continues to hand out copious copies of their phone number to report breaches of compliance and complaints to them. No one in the community wants a relationship with the quarry based upon being a “policeman”. Compliance with the conditions of consent should be the quarry’s business.