



6 September 2010

The Director General  
The Department of Planning  
23 – 33 Bridge Street  
SYDNEY NSW 2000

By Email: [christine.chapman@planning.nsw.gov.au](mailto:christine.chapman@planning.nsw.gov.au)

**Attention: Ms Christine Chapman**

Dear Ms Chapman,

**RE: LIGHT HORSE BUSINESS CENTRE – APPROVED PROJECT NO. MP 06-0239  
PROJECT MODIFICATION – YOUR 06.09.2010 EMAIL**

I refer to your 6 September 2010 email requesting additional information regarding the proposed modifications.

Please see below our response which provides further detail on the conveyor and chute and their operation, and also addresses the Department's concerns regarding the management of asbestos waste.

### Conveyor & Chute Operation

The loading hopper of the conveyor will be within the MPC Building and residual material less than 300mm average size from the proposed automated sorting/recycling process will be deposited into the hopper and thence onto the conveyor which will be 1,800mm wide.

The conveyor will then protrude from the northern side of the MPC building and parallel with it. It will be situated within a covered culvert (lower than the MPC floor level) until it reaches the edge of the Quarry lip. The culvert and conveyor will pass under the road.

It will then empty its contents into a loading hopper or silo. The connection point will be covered by a removable hood. When the silo is full, the conveyor's operation will be temporarily interrupted, load scales on the hopper will record the weight of the load and then the contents will be progressively released onto the next level conveyor below the lip of the Quarry and from the base of the silo.

The next level conveyor will be covered by a hood along its length which is removable in sections if required. The conveyor will be angled towards the base of the quarry at an angle not exceeding 50 degrees.

At the point shown on the diagram in the project modification application (about halfway down the quarry side) the covered conveyor will discharge its material into a tube or pipe of 2,000mm diameter (which has variously been described or referred to as a "chute").

The Chute or pipe will continue at an angle towards the base of the Quarry ending about 6 metres from the Quarry floor. A canvas sock will ensure that the actual drop height between the end of the sock and the floor is

no more than 3 metres. The discharge end of the chute will be equipped with fine mist sprays to generate fine particle water mist when discharge is taking place. This will minimise dust generation.

Material will then be distributed around the base of the Quarry for filling and compaction by heavy plant.

The conveyors (2) will be electrically driven from mains power supply and subject to the normal regular and routine maintenance regime of all items of plant and equipment used in the business.

Backup power supply will be provided by on site diesel driven generators.

In the event of total failure of plant or power, trucking of material to the base will be carried out as outlined in the EA.

### **Asbestos Waste**

Asbestos waste will be managed in accordance with the procedures set out in section 29 of Appendix 7 (Volume 2) of the Environmental Management Strategy document (EMS) (previously provided to you) and as such will not enter the MPC but be directly bagged and trucked to the base of the Quarry where it will be buried. As it will not enter the MPC, it will not have access to the conveyor/chute and will not be compacted until it has first been buried and covered over.

For your ease of reference I have copied the relevant section of the EMS below.

#### ***BONDED OR STABILIZED ASBESTOS (CATEGORY 1) WASTES***

*The Site Operator will typically deal with bonded asbestos from the Construction and Demolition waste stream and not with loose and friable asbestos which can pose risks of generating airborne fibres if disturbed.*

*Asbestos wastes will be dealt with at the site through a series of measures as follows:*

- 1. Staff training in accordance with the Industry Asbestos Awareness Course and follow up course by trained in house staff or by external trainers to be undertaken on a regular basis at least once a year;*
- 2. Checking and inspection of incoming materials prior to stockpiling or processing to minimise the risk of asbestos wastes as follows:*
- 3. First inspection will be conducted when the load arrives at the facility*
- 4. Independent auditing of this system which minimises the risk of the presence of asbestos and other contaminants;*
- 5. Recording of non-complying generators illegally disposing of asbestos wastes; and*
- 6. Redirecting of asbestos wastes to other appropriate facilities or landfilled at the site in accordance with strict regulatory guidelines as set out below.*

*Wastes that contain asbestos will not be mixed with other wastes.*

*All asbestos will be carefully unloaded under supervision by the operator.*

*Disposal of asbestos will be required to meet the site license conditions and comply with Clause 42 of the Protection of the Environment Operations (Waste) Regulation 2005 NSW.*

*The requirements to be implemented by the site operators regarding the collection, storage and landfilling of asbestos wastes are as follows:*

- *Unbagged, uncovered or unsecured asbestos fibre and dust waste will be directed back to the quarantine and gatehouse area for redirection and the DECCW will be informed and an incident report completed. Waste that is classified as loose or fibrous will not be dealt with except in accordance with the following procedures:*
  - (i) *the waste will be bagged and covered in such a manner so as to prevent the emission of any dust;*
  - (ii) *the waste will be collected and stored in impermeable bags,*
  - (ii) *each bag will be made of heavy duty low density polyethylene of at least 0.2 mm thickness, and have dimensions of no more than 1.2 m in height and 0.9 m in width,*
  - (iii) *each bag must be sealed by a wire tie, and contain no more than 25 kg of waste, and*
  - (iv) *each bag must be marked with the words "CAUTION ASBESTOS" in letters of not less than 40 mm and which comply with AS 1319—1994, Safety signs for the occupational environment.*
- *if asbestos waste in any form is stored in a bag, the following procedures will be followed;*
  - (i) *the bag will be placed in a leak-proof container that is used only for the purposes of storing asbestos waste;*
  - (ii) *the container will be marked with the words "DANGER—ASBESTOS WASTE ONLY—AVOID CREATING DUST" in letters of not less than 50 mm and which comply with the Australian Standard, and*
  - (iii) *the container will have a close-fitting sealed cover so as to prevent any spillage or dispersal of the waste,*
- *asbestos waste will be stored in a secure area so as to prevent entry by unauthorised persons and to prevent the risk of environmental harm and where possible will be stored separately from other types of waste.*
- *if asbestos waste that is in the form of stabilised asbestos waste in bonded matrix is stored otherwise than in a bag in accordance with paragraph (c), the following procedures will be followed:*
  - (i) *if it is practicable to do so, the waste will be wetted so as to prevent the emission of any dust,*
  - (ii) *in wetting the asbestos waste, special care will be taken to ensure that the wetting process does not cause any emission of dust or lead to any discharge of polluted water, and*
  - (iii) *the waste will be kept covered at all times.*

*Covered Containers carrying bagged waste will be transported to the Landfill base by truck and not transported by chute. There the containers will be unloaded in the manner described.*

*For the disposal of asbestos waste at the Landfill, the waste will be by way of burial at least to a depth of 0.5m on the same day it is received and finally to a depth of at least 20 m beneath the planned final land surface of the landfill site. Loads requiring separate burial (i.e. which have some loose fibres or are friable in condition) will be placed in pre-prepared trenches and immediately covered by the operator.*

*For logistic reasons co-disposal of asbestos materials if accepted with general refuse, will be practiced in preference to separate (monofill)/segregated asbestos burial at one (single) location in the Site.*

*In disposing of asbestos waste in any form at the landfill, the waste will be unloaded in such a manner as to avoid the creation of dust. The waste will not be compacted before it is covered and will not come into contact with any earthmoving equipment at any time.*

I hope that this letter addresses the matters you raised in your email.

Do not hesitate to contact me if you have any further questions with regard to the project modification application.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'G. Openshaw', written in a cursive style.

**GREG OPENSHAW  
SOLICITOR**