



Our reference: EF13/3448:DOC13/82337-1:PB
Contact: Craig Patterson(02) 4224 4100

Manager Industry
Department of Planning & Infrastructure
(Attention: Chris Ritchie)
GPO Box 39
SYDNEY NSW 2001

Dear Mr Ritchie

**PORT KEMBLA COPPER 200M STACK DEMOLITION
REVISED DEMOLITION MANAGEMENT PLAN**

I am writing in response to the request from the Department of Planning and Infrastructure dated 7 November 2013 for the Environment Protection Authority's (EPA) comments on the latest version of Port Kembla Copper's Stack Demolition Management Plan (SDMP).

On the basis of a review of the SDMP, the plan has included additional information in response to the issues raised by the EPA in its previous submissions and discussions with PKC. EPA's comments are provided in the attachment to this letter (Attachment A) and relate mainly to the procedures that underpin the SDMP particularly in relation to community notification and clean up protocols.

In providing these comments the EPA has also read the public submissions as they relate to the exhibited SDMP available on the NSW Planning Major Projects Register.

Should you have any questions please contact the above officer.

Yours sincerely

G Howard 14/11/13

GISELLE HOWARD
Director Metropolitan
Environment Protection Authority

Attachment A

ATTACHMENT A

1. The EPA does not approve or endorse Environmental Management Plans. EPA's role is to set environmental objectives for environmental management, not to be directly involved in the development of strategies to achieve those objectives.
2. The SDMP states there are three key plans associated with the activity. These include the SDMP, the Evacuation Management Plan and the Stack Demolition Process and Techniques Plan. All plans must be consistent with each other and form a comprehensive and integrated management framework.
3. The demolition of the PKC stack is a highly specialised and unique activity. Its size and proximity to residential areas requires careful evaluation of all risks, the necessary measures to reduce and manage these risks and the contingencies that will be put in place if unacceptable impacts occur.

It is important that both best and worst case risks are identified and uncertainties acknowledged. This is because:

- It is difficult to predict the exact magnitude of the dust cloud that may arise from the activity. Even with the proposed dust controls there is the potential for a dust cloud to be generated and prevailing winds to blow the dust cloud offsite and into residential areas.
- There may be limitations in the management measures proposed and their performance on the day to prevent or reduce dust escaping from beyond the boundary of the premises. For example the adequacy of proposed dust management measures will be dependent on the outcomes of the full-scale trial of the water cannons to be held at a future date.
- The movement and extent of any dust cloud beyond the boundary of the premises cannot be accurately predicted beforehand and will be highly dependant on the behaviour of the stack felling, the performance of dust control measures and the prevailing weather conditions on the day. For example, a very localised dust plume of short duration could result that may bypass air quality monitors on the day despite the best pre-planning efforts.

The SDMP provides some general statements about the potential for offsite dust impacts and measures to control them. Further strategies and protocols should be required to be in place before the activity occurs that underpin this SDMP and to assist the community in understanding all risks and that effective precautions and measures are in place to address these risks. This should include a clear strategy for advising the community of potential dust impacts and a protocol for the clean up and rectification of any impacts should they occur. This is further discussed below:

a) Community Notification Protocol during demolition

The SDMP includes a proposed language communication strategy in Appendix H. This strategy is important in informing PKC's pre-demolition communication strategy and any supporting information developed to protect the community. EPA recommends that NSW Health be consulted in the development of this strategy well in advance of any proposed demolition date.

Some of the key messages relating to the early warning of residents regarding potential dust impacts have not been included. It also states that dust is expected to settle within the boundaries of the PKC site. The strategy should address the key issues raised in the public submissions and also be consistent with the information included in the SDMP.

b) Protocol for the Clean Up and Rectification of any impacts.

The SDMP states that PKC will arrange and pay for the cost of cleaning of all impacted private and commercial properties if dust from the stack demolition results in amenity issues. It also states that an assessment of potential risks to human health will be conducted if monitoring indicates dust levels greater than the screening criteria are recorded. Community expectations regarding clean up may be based on amenity and/or health concerns and in either case may not be limited to whether the screening criteria have been met or not. The logistics of this process and time required for it to be undertaken should be clearly understood and documented before the event to avoid unnecessary delays in providing confidence to the community that any impacted properties are

promptly cleaned and do not cause a concern to human health or the environment. The clean up protocol should include but not be limited to:

- Monitoring programs to be undertaken during/after the event to identify the extent and impact of any dust.
- Sample collection and analysis to identify dust constituents and determine the risk profile of the dust.
- The time required for samples to be collected and sample results to be obtained from the laboratory.
- Management of settled dust including dust recovery and cleaning of properties, including any interim management measures until sample results are obtained.. The management measures could include sweeping/vacuuming dust from hard surfaces using commercial operators and using water carts to wash down houses, windows, driveways and vehicles.
- Dispute resolution.

4. The SDMP indicates on page 22 that wind speed and direction can vary depending on seasonal variations and this can influence the potential for dust impacts to occur in residential areas. This information however was limited. As the exact date of the felling is yet to be confirmed, the EPA suggests that further analysis of wind direction and the timing of the event be considered to see if it is practical to undertake the activity when the likelihood of winds blowing towards the residential areas are minimised.

The EPA has undertaken a preliminary review of historical wind speed/direction and other climate data available on the BOM website. The 9am and 3pm wind roses for the months of November, December, January, February, March and April for Bellambi and Port Kembla Signal Stations were reviewed. This information appears to indicate:

- The strength and frequency of north easterly winds varies considerably during the time of day for the summer and autumn months and is typically lower in the morning than the afternoon.
- During summer the frequency of northerly and southerly winds in the morning is almost the same.
- The strength and frequency of south, south-easterly and south-westerly winds increases in the morning from late summer (eg February) onwards through autumn and reaches a maximum in winter months.
- On average February and March tend to be the wettest months in the Illawarra.

Winds from the south, south easterly and south-westerly winds (offshore) blow away from the Port Kembla residential area. These are the most favourable winds and could provide a further safeguard to the community from potential dust impacts.

Noise and Vibration

5. The ANZECC Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration need to be considered when interpreting the predicted blast overpressure and ground vibration levels and compliance with the limits in the project approval. The intent of these criteria is to minimise annoyance and discomfort to persons and are not intended to control damage.

Waste Management

6. The SDMP states the approach used to classify and manage stack demolition waste will be conducted in a manner consistent with the December 2010 DMP.

Whilst PKC has advised that all asbestos has been removed, the EPA reminds PKC that under the Protection of the Environment Operations (Waste) Regulation the reprocessing of wastes containing any asbestos is not permitted.

The SDMP states that the stack is unlikely to contain Hazardous or Special Wastes. PKC should confirm this statement by providing an indicative waste classification of the materials in the stack in

accordance with the EPA's Waste Classification Guidelines. PKC should confirm that the vast majority of the stack materials (being concrete not exposed to emissions) may be classified as General Solid Waste and the internal stack bricks as Restricted Solid Waste. Some information in Appendix E could inform this.

PKC should also include a statement of its ability to sort the materials after demolition has occurred to assist in maximising the reuse of clean material onsite and disposal of other contaminated material offsite in an approved manner. In accordance with the Waste Classification Guidelines, if it is not possible to sort the materials, the whole waste must be classified according to the highest class of waste.

General

7. The PKC "stack info" website contains several erroneous and out of date statements. For example, the FAQs still refer to a 250 metre exclusion zone and state all dust will be confined to the PKC premises. It needs to be expanded and updated to be more closely aligned with the SDMP and to address the issues raised in the public submissions.
8. The EPA encourages PKC to begin reporting air quality data from its ambient air quality monitoring program prior to stack demolition. The PKC "stack info" website should be utilised for this purpose.
9. The SDMP states there is no infrastructure in the proposed fall zone. PKC should also ensure that appropriate measures are in place to protect infrastructure (For example, water, gas, sewer, electricity etc) outside the intended fall zone in the unlikely event that the stack falls away from impact zone.