

TERREY HILLS PROGRESS ASSOCIATION

KIMBRIKI RESOURCE RECOVERY PROPOSAL C10_0064/MP 10_0065

This submission was compiled by members of the Association April 2011

The following issues are raised after a cursory appraisal of the Environmental Assessment dated Feb. 2011 and are submitted because of lack of notification of this proposal to the residents of this area. They are based on a reasonable understanding of the disciplines on which the comments are made and a knowledge that all four local Councils will not provide an independent oversight of the design, construction or operation, due to their pecuniary interests in this development. Following are our objections to the proposal as it stands.

ADDRESSING THE EXECUTIVE SUMMARY

- Consultation: Page xv - Actual real consultation appears to have been to speak to 7 adjoining property owners and attempt to satisfy their concerns. However there are some 1500 or more residents of Terrey Hills who are possibly affected by the odours produced as a result of the proposed development, in addition to the downstream environment of Deep Creek and Narrabeen Lagoon.
The interests of these other neighbours do not appear to have been canvassed.
- Construction Air Quality: Page xvii - Comments on construction air quality compliance are based on the 24 hour Annual Average Criteria.
This indicates that during days of out-of-the-ordinary weather conditions, it is most likely that air quality test results will be outside the acceptable limits.
- Odour Control: Page xix - Operation odour measures taken to reduce the potential for odours to occur outside the Resource Recovery (RRF) building rely entirely on specially constructed biofilters and odour scrubbers.
The proponents should provide specific existing successful installations of these so the community can determine if they have a history of satisfactory operation.
- Odour Control - Existing: Page xix - Current landfill and composting operations do not meet the 99 percentile compliance for odour control.
Thus the statement “cumulative odour emissions that include current emissions associated with the existing landfill would also meet this odour criterion” is false.
- Quality of Work: Page xix - Specifications provided to the equipment suppliers need to ensure there is a buffer included for ‘out-of-specification’ failures in the performance of equipment supplied, average and not perfect installation, and average operation and maintenance regimes as these issues are the cause of failure of very high percentage of all environmental plant to operate as designed. Once installed such plant is rarely replaced with compliant equipment and the plant always continues to run contrary to design specification.
The community cannot trust this project to be successful unless these issues are shown to be addressed beforehand.
- Uncontrolled Odour: Page xx - Odour generated from garbage truck movements and offloading of waste will be entirely dependent on site management. It is inevitable that the ‘normal habits’ of workers and management will reduce site behaviour to ‘average’ at best. This will give rise to uncontrolled odours being emitted from the site.
The only way to prevent such negligence is for the community to have access to a ‘specially empowered independent person’ who will enforce good management practices.

- Noise: Page xxi - Although operational noise within the building is to be checked for compliance during commissioning,
no statement is made that noise compliance around the surrounding streets and district will be maintained at all times within the current ambient readings during the night-time hours. This must be guaranteed.
- Traffic Management: Page xxi - The suggested procedures for traffic management at the Mona Vale Rd intersection are totally inadequate. It is recommended in the body of the report that right-turn both into and out of Kimbriki Rd should be restricted to outside the morning traffic peak hours.
This will only create more anguish for persons accessing the tip during those times and the probability of U-turn accidents on Mona Vale Rd will drastically increase. This measure should not be considered as an option.

For this project to go ahead, Mona Vale Rd must be upgraded to a 4-lane road from Booralie Rd to east of the Kimbriki intersection and traffic lights installed at the intersection as was provided on Forest Way for the Belrose Tip.

- Surface Water - Construction: Page xxiii - It is proposed that cut-off drains will discharge into the existing Council drainage. Since there is a propensity for the existing drainage to overflow the current storage during periods of prolonged heavy rainfall, this proposal is not satisfactory.
Cut-off drains should discharge below the existing storage dam in a manner to prevent scouring of the watercourse.
- Surface Water - Operations: Page xxiii - Although the body of the report states that the existing storage pond is adequate for the 5yr ARI over 24 hours, this is most unlikely to be the case, just by careful scrutiny of the figures provided and industry operational practices.
Therefore rainwater run-off from the proposed roof areas, as well as the paved operations areas, must be directed to the proposed dedicated stormwater detention basin to comply with current Council and State requirements for other developments within Terrey Hills.

There is no mention of how spilled leachate from the garbage trucks will be collected and treated for pathogens derived from human waste in the domestic garbage, illegally dumped liquid waste and chemicals in the garbage. This would be a significant issue and requires more attention than appears to have been given.

- Social Impacts: Page xxvii - Although it is stated that “the potential for negative impacts would be reduced,”,
There actually appears to be a high potential for social impacts to the surrounding residents from noise at night-time, odours at all hours, contamination of Narrabeen Lagoon during sustained wet weather and congestion along Mona Vale Rd.
- Summary Conclusion: Page xxviii - Although it is stated that “The environmental assessment concludes that many of the potential issues identified would be effectively managed through project design features”,
the report fails to address the commonly held knowledge, throughout the consulting engineering industry, that it is the ‘lowest common denominator’ which will cause a project to fail technically. That denominator is people.

CONCLUSION

1. This project is likely AT BEST to result in an AVERAGE OUTCOME in terms of design, construction, commissioning, operation and maintenance, much of which is not central to the core business of the proponent, which is getting rid of waste material in a timely fashion.
2. The local people and environment will suffer accordingly without significant changes to how the project is designed, delivered and managed.
3. Other waste processing facilities reliant on a high degree of technical management skill have failed the odour test especially, and no reasons have been provided in this Environmental Assessment to conclude that this one will perform any better.
4. It is based on dismissal of the small detail that causes process failure. Such details are: that sorting incoming waste will prevent pollutants entering the waste stream; that the existing water management does not allow release of contaminants and high water flows downstream; that effects on neighbours will be managed; that special air filtration will somehow miraculously reduce odours to being undetected; that equipment peak operation is sustainable over the life of the plant; that Mona Vale Rd users will happily turn kilometres out of their way during peak periods to gain entry to and from the tip; that environmental monitoring will somehow make the operator comply; that large storms only occur a day at a time; that the operator will miraculously budget for and fund every activity that will be required to ensure 100% operational success; that the design garbage volume will not be exceeded; that indeed the equipment will actually meet design requirements.
5. This operation is best suited to the site that is in existence at Belrose Waste Management Centre with only land fill to the Kimbriki site. This would not require any additional truck movements or road upgrading as the vehicle movement would be only around 15% on the proposed recycling.
6. Communities in the vicinity of the Belrose putrescible tip have developed with the full knowledge of any associated adverse traffic, noise, odour and dust nuisances. Any expansion of the truck movements, sorting activities and processing would be unlikely to have the same effect on the existing population as it would on the existing Terrey Hills population within a similar radius. Likely operations failures would impact less on current populations as Belrose site is not adjacent to a shopping centre as is Kimbriki.

Thank you for providing the opportunity to state our concerns.

Yours sincerely,

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