

7 September 2022

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Charter Hall
C/- Project Strategy
PO Box 271
Sutherland NSW 1499

Attention: Tim Greenaway

Dear Tim

Rooty Hill MRF Installation of a wheel wash

1 Introduction

The NSW Environment Protection Authority has requested a wheel wash be installed at the Rooty Hill Materials Recovery Facility (MRF), planned to be constructed at 600 Woodstock Avenue, Rooty Hill, and operated by Cleanaway. However, based on waste management industry experience and the type of facility, in my opinion it is very doubtful that the risk of contamination to vehicles is sufficient to justify the installation of a wheel wash.

In forming this opinion, I have considered the benefits of wheel washes in certain circumstances, as outlined in Section 2, and my experience with MRFs, as outlined in Section 3. I have also consulted with waste management specialists, including Hugo Kandelaars at Wheelwash Australia Pty Ltd, and another waste management specialist with 27 years' experience in the industry.

2 Wheel Washers

Wheel washes are designed to clean dust, mud, dirt, sediment, soil and clay from the tyres, wheels and underbody of heavy vehicles and prevent these materials from being tracked off site. Wheel washes are typically installed at sites, such as construction sites and landfills, where these materials are present and likely to be picked up by vehicles. Construction sites and landfills feature unsealed roads over which heavy vehicles will travel and pick up dust and mud. Heavy vehicles using these sites may also be carrying building material and/or building waste for processing or disposal and, as a result, may have dust and dirt on their wheels and bodies.

Wheel washes may also be installed at sites where contaminated materials, such as lead dust, might adhere to the wheels and bodies of vehicles. Wheel washes are not designed to clean off large items such as soiled paper, cardboard or crushed containers.

If a wheel wash is installed, on balance, the cost and maintenance requirements cannot be justified considering the very low risk of contamination.

I have been to many MRFs in Australia and New Zealand and I have not seen a wheel wash at any MRF I have visited.

MRFs I know that do not have wheel washes installed include:

- Visy, Smithfield
- IQ Renew, Somersby
- Polytrade, Enfield
- Polytrade, Rydalmere
- Handybin, Coffs Harbour
- Hume MRF, ACT
- Former SUEZ MRF, Chullora
- Veolia, Spring Farm
- The former Visy and Cleanaway MRF, Bessemer Road, Blacktown
- Rockhampton MRF
- Hannans MRF, Darwin
- Auckland MRF.

Wheel washes are unnecessary for the operation of a MRF or to manage its impacts. As a result, there is unlikely to be a single MRF in Australia that has a wheel wash installed.

3 My Experience

I am Technical Director, Waste and Resources Management, Asia-Pacific, at SLR Consulting. I have a Bachelor of Applied Science from the University of Technology, Sydney and Master of Environmental Studies from Macquarie University, Sydney. I am a Member of the Waste Management and Resource Recovery Association of Australia and WasteMINZ, the peak body for the waste management industry in New Zealand. I am an environmental consultant with more than 30 years' experience in waste management. I have worked for the NSW EPA, waste management contractors and consultants.

Over my years in the waste management industry, I have been involved in many MRF-related projects including the following:

- In 2022 I was an expert witness in the case of Handybin v Coffs Harbour City Council, which dealt with how the proceeds of CDS materials processed by the Coffs Harbour MRF would be divided between Handybin and Coffs Harbour City Council.
- In 2017-2018 I was a member of the APC team that undertook audits of MRFs in NSW and every council in NSW to determine the number of CDS containers in recycling streams as part of the establishment of the NSW container deposit scheme.
- In 2015-2016 for ACT NOWaste I prepared the bulk of the tender and contract documentation for the operation of the Hume MRF in the ACT and was a member of the tender evaluation panel that assessed tenderer's submissions.
- In 2014 for the NSW Office of Environment and Heritage I undertook a review of NSW waste data, projected waste quantities into the future and calculated resource recovery infrastructure needs for 14 regions of NSW. The project required compiling a comprehensive list of waste infrastructure including MRFs.

- In 2012 for ACT Territory and Municipal Services I assisted with preliminary studies and research for the preparation of a business case for the development of a new MRF at Hume in the ACT. The project involved mapping the current MRF, calculating costs, projecting feedstock data and preparation of a high-level transition plan.
- In 2006 for the NSW Department of Environment and Conservation I prepared a check list of typical MRF components along with descriptions and photographs for a survey of MRFs in NSW.
- In 2003 for Waste Service NSW I undertook analysis of data gathered from audits of samples of recyclables delivered to Chullora MRF to establish the relationship between load compaction and density and the proportion of broken glass.

Since 2001 I have managed or personally undertaken a number of audits of MRF inputs and outputs including:

- 2006 - Audits of glass fines by particle size and colour at JJ Richard's Brisbane MRF for the Queensland EPA, now the Department of Environment and Science
- 2006 - Census of major waste infrastructure including MRFs for WA Department of Water Environment and Resources
- 2005 and 2006 - Audit of residual material produced at the Hume MRF over five days for ACT NOWaste
- 2004 - Audits of residual waste from three MRFs to which members of Eastern Metropolitan Regional Council (WA) delivered recyclables
- 2001, 2002 and 2003 - Audits of recyclables delivered to Chullora MRF
- 2001 - Audits of MRF waste for Gold Coast City Council.

I have lectured in waste management at the University of NSW and was a judge for the 2015 and 2017 National Landfill and Transfer Stations Innovation and Excellence Awards for the now Waste Management and Resource Recovery Association of Australia.

4 Conclusion

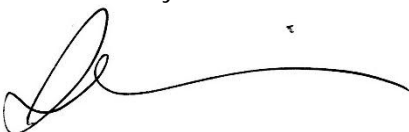
Installation of a wheel wash at the proposed MRF is unnecessary. Wheel washes are designed to clean heavy vehicles of dust and mud at sites with unsealed roads such as construction sites and landfills.

Sites like the proposed MRF, that are entirely sealed and paved, will not generate any dust or mud. Wheel washes are not designed to clean off materials such as cardboard and crushed containers.

From my experience a wheel wash is not needed at this site as no mud or sediment will be generated on-site.

From the experience and examples detailed above, it is unlikely that a wheel wash has been installed at a MRF in Australasia.

Yours sincerely



ANDREW QUINN
Technical Director - Waste and Resources Management

Checked/ Authorised by: DB
