Catherine Hill Bay Progress Association

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Frazer Park Quarry Resource Recovery Facility

Development Application No SSD 6518

To whom this may concern.

SUBJECT: VOLUME 1 - ENVIRONMENTAL IMPACT STATEMENT - WASTE AND RESOURCE MANAGEMENT FACILITY - SSD 6518 - HODGSON QUARRY PRODUCTS PTY LTD - 800-900 PACIFIC HIGHWAY - FRAZER PARK

This submission is made by way of objection to the above stated EIS Vol 1, the grounds of which follow:

Page 2 – Imported materials includes "ash".

Objection 1 – even though the EIS states imported materials includes "ash", very little is mentioned about the on site management of this material. This material is susceptible to creating dust and water contamination, hence this EIS needs to articulate design / engineering details in order to address these environmental risks?

Page 2 – "It is estimated that the maximum amount of materials to be imported would be 200,000 tonnes per annum.

Objection 2 – the figure for imported material is "**estimated**". This could mean that given increased market demands the site could increase its on-site tonnages without further consent from the statutory authorities, is this correct? If this is the case, prior to DA approval there must be a limit set as to how much material can be brought to and stored on this site as current controls mentioned in the EIS are commensurate with this figure of 200,000t. If no limit is set, increased waste tonnages could have the potential to tip the balance of the sites impact on the environment. In summary, a site tip / storage / process capacity should be set at 200,000t.

Page 2 – "If 200,000 tonnes of material is imported to the site over a period of 48 weeks, the average weekly importation of material would be 4,200 tonnes which, Assuming an average load of 30 tonnes, would generate an additional 28 one-way truck movements per day."

Objection 3 – this figure of truck movements is oversimplified and hence misleading as it assumes that all trucks bringing imported materials to site will take the same amount of materials out. This will not be the case as often trucks will dump waste and leave empty……..time is money! Additional trucks will be required to move the recycled material as and when required. It is not a simple "truck in / truck out" equation and this needs to be considered when looking at a risk free truck / Pacific Highway intersection.

Also, not all trucks will be 30t and smaller trick usage may increase the traffic movement by 100%!

In addition, more trucks will be required to move the report's stated 10% landfill material. This 10% has not been considered in the truck movements!
The number of truck movements need to be accurate and realistic as increased trucks will result in additional impact to the environment as well as increased exposure to a catastrophic collision on the Pacific Hwy intersection.

Page 3 – "There are no sensitive receivers which are predicted to experience GLCs of TSP above the assessment criteria"

Objection 4 – this statement needs to reconsider the additional truck movements as the stated "28 one way truck movements per day" is understated as previously mentioned.

Page 4 – "Progressive rehabilitation of exposed areas."

Objection 5 – on viewing the EIS photos it appears that to date this site has fared poorly when it comes to any rehabilitation. The State is having major problems with abandoned quarries and open cut mines not being rehabilitated so why does this EIS not include a rigorous rehabilitation program with activities and timelines included. Rather than a scant one paragraph, a detailed Rehabilitation Management Plan should be prepared for this site and included in the EIS and DA.

Page 5 – "the Catherine Hill Bay Cultural Precinct"

Objection 6 – Catherine Hill Bay is more than a "Cultural Precinct" it is a designated Heritage Village, only one of 3 in NSW. Consideration of the impact that the EIS and DA will have on this Heritage Village has been scant regard in this EIS. Attention needs to be drawn to this omission.

Page 5 – "The noise level at the worst affected location along the western boundary of the Catherine Hill Bay Residential Development"

Objection 7 – a new residential development located within 800m of the proposed recovery facility is approved to for 550 houses covering 7 stages. Stages 4 & 5 as well as 6 & 7 will be closest to the proposed waste recycling plant and noise / dust / smell, etc needs to be given greater consideration for these areas as the current EIS tends to understate this potential impact.

Page 6 – "The additional 28 truck movements on Pacific Highway would increase noise levels by less than 0.1dBA. The predicted increase is not noticeable and negligible impact is expected."

Objection 8 – as previously mentioned, this statement is incorrect as additional truck movements will be greater than "28 one way truck movements per day". Realistic truck movements need to be used in this EIS in order to properly assess the impact these movements will have on the environment including the facility / Pacific Hwy intersection.

Page 7 –"The additional traffic generation as a result of the increased volume of imports has no detrimental effect on the Pacific Highway."

Objection 9 – as previously mentioned, this statement is incorrect as additional truck movements will be greater than "28 one way truck movements per day". Also, the traffic study assumes that the majority of trucks will be going south and this may change given market demand and location. If this is the case and more trucks, when coming from site, turn north onto the Pacific Hwy then the risk of a potential fatality goes from remote to possible. Realistic traffic movements need to be used in the EIS's traffic report as at the moment they are understated.

Page 7 –"The additional traffic generation as a result of the increased volume of imports has no detrimental effect on the Pacific Highway."

Objection 10 – The traffic report is based on RMS Historic Tube Counts June 2013. Given the dramatic increase in vehicle movements along the Pacific Hwy since 2013, as well as the 550 house development (at least another 550 vehicles) under construction at Catherine Hill Bay, the traffic figures used in this EIS do not reflect realistic current as well as future vehicle movements.

Realistic traffic movement figures need to be used in the EIS's Traffic Study. The Pacific Hwy has changed dramatically over the past few years, given the massive development in this region and is now an extremely busy Highway which will only get busier over the coming years. Without proper hard controls to address the increased truck flow from the new facility onto the Pacific Hwy, there is real potential for a catastrophic collision at this point. The increased volume of recycling material

imports and exports from this site will have a massive effect on the Pacific Highway and this has been understated in this EIS and this omission needs to be addressed.

Page 8 –"The Tip and Sort area will be constructed to receive and sort waste products prior to processing. It will consist of a hardstand area"

Objection 11 – there is no mention in this EIS as to how the "hardstand" will be built, i.e. compacted dirt / clay / gravel OR concrete. Given the nature of the waste materials being brought to site and the potential for water contamination via surface or subsurface drainage (note: much of the area is built on sandy soil) then the EIS should state precisely what the hardstand areas are constructed from. These areas include:

a) Tip and Sort area
b) Raw Recycled materials bays
c) The recycled products pad
d) 10% Waste fill material

The recovery facility is proposed for a very sensitive site as it is surrounded by Lake Macquarie to the west, Catherine Hill Bay village to the north / east, new 550 home development to the north / east, ancient wetlands to the east and Munmorah State Recreational Park, adjacent and to the east. For the proposed 200,000t facility to guarantee no future (over the life of this project) impact on any of these adjacent areas, the new facility needs to be designed and constructed to a high engineering standard, and not on the "smell of an oily rag"!

This EIS and the attached basic designs for hardstands, sealed roads, dams and spillways are not commensurate with the Recovery Facility's location which is adjacent to extremely sensitive heritage, social and environmental areas. The current design criteria is inadequate in dealing with the proposed facility location and its potential to have a major impact on these adjacent areas.

This EIS and its design criteria are not appear "best management practices and mitigation measures to minimise the potential for adverse impacts". This needs to be addressed before any approvals are given.

Page 1 – 3 - Figure 1-1 shows the regional location of the Site. Figure 1-2 shows a more detailed Site location.

Objection 12 – The proposed recovery facility's plan is not current and does not reflect what the regional location is today. The existing recovery facility is located near acutely sensitive residential and natural environments. The plan shows Moonee Colliery, coal tailings and coal stockpiles which no longer exist and has been superseded by a 550 house subdivision. It also shows waterways leading onto Moonee Beach but does not indicate that these waterways pass through incredibly sensitive ancient wetlands and the Munmorah State Recreational Park.

This EIS and its elementary designs for the facilities such as hardstands, dirt roads, dams and spillways are not commensurate with the Recovery Facility's location which, as mentioned, is adjacent to extremely sensitive heritage, social and environmental areas.

This objection is about the current EIS and its design criteria being inadequate in dealing with the proposed facility and its potential to have a major impact on the adjacent highly sensitive areas. Again, this EIS does not reflect "best management practices and mitigation measures to minimise the potential for adverse impacts".

Page 2 – 5 – Section 2.3 Project Design - The Waste and Resource Management Facility has been designed to accommodate the requirements of Hodgson Quarry Products while at the same time minimising the potential impacts to the surrounding environment. This has been achieved through the following design objectives"

Objection 12 – The proposed facility design is based on the site's current quarry standards which, on reviewing the site photos provided in the EIS, appear to be of a poor "best management practices" and engineering standard. Before any approval is considered for this project, the principal should submit an EIS (design and build) to a standard that is commensurate with the increase in production of 300% and its sensitive location.

For this new facility to be "best management practices", the EIS should at least mention the inclusion of a Traffic Management Plan, Dust / Noise Management Plan, Fire Management Plan and Water Management Plan for this site but these Plans are not mentioned, why?

Page 2 – 6 states "The earthworks would include use of the impermeable clay on the site which is currently stockpiled at the southern end of the weighbridge. The clay material would be utilised to provide the base for the entire picking/sorting and bin areas. On top of the clay materials would be a 100mm layer of 20mm minus blue road base material to provide for a working floor to these main areas of the proposed development."

Objection 13 – given the facility's environmentally sensitive location the use of clay and road base for the tip / sort, stockpiles and bin areas appears to be a simple and cheap design which provides no long term guarantee to prevent contaminated water finding its way into the sandy subsoil and onto the Recreational Park's ancient wetlands and into the ocean.

The engineering / civil design for this facility needs to be commensurate with its location and have built into its design robust controls to prevent air / water / ground pollution and be best management practice.

Page 2 – 6 - Section 2.4.2 Soil and Water Management

"• Installation of a 1.8m high chain wire fence covered with geo-textile filter fabric, to the perimeter of the work site area, where required."

Objection 14 – the term "where required" is too loose and needs to be defined in the EIS. If not, no fence / fabric will be installed.

Page 2 – 7 and 2 – 8 Re; Figures 2.3 and 2.4.

Objection 15 –

Figure 2.3 – re; general layout of bins in sorting area – design needs to show more detail such as height of these bins plus the type of construction, i.e. concrete walls and concrete graded floor. Also, there is no detail re; water catchment and drainage.

At least design shows the bins have a wall on the southern side to protect against strong prevailing southerly winds. Unfortunately wall height is not mentioned so stockpiles in each bin could be higher than the back walls – therefore, dust pollution could be a major issue if bins are overfilled.

Objection 16 –

Figure 2.4 – Figure 2.4 Layout of recycled product bins – design needs to show more detail regarding the type of construction, i.e. concrete graded floor and bund walls, as well as water catchment and drainage. This figure title is misleading as this layout shows open stockpiles **NOT** "bins".

These stockpiles cover an approx. area of 100m wide x 70m long and are shown as 6m high. From an environmental perspective these stockpiles, in dry and hot conditions with southerly winds, could result in large amounts of dust being blown onto the Munmorah State Recreational Park as well as Catherine Hill Bay Village and the new 550 house development. These stockpiles are not protected from the strong southerly winds which could spell disaster for the Bay Village and new developments.

Also, there is no mention as to how these large stockpiles ("bins") are to be managed to minimize the impact of wind and rain.

The design details are very basic and lack detail. Design needs to be robust so they reflect robust and best practice engineering standards that guarantee long ongoing protection to the surrounding sensitive environment over the life of this facility.

In addition:

a) how is fly ash going to be managed re; environmental risks?
B) how is mulched timber going to be stored and managed re; environmental risks including fire risk?

Page 2 – 11 Re; Table 3

Objection 17 – Table 3's Figures assume all trucks bringing waste will take product material out. This is not a correct assumption and the Table needs to be reviewed to reflect a more accurate and realistic traffic flow regime. Also, 10% of material cannot be recycled and has to be taken off site, this additional truck movement has not been included in Table 3's figures! In addition, not all trucks will have a 30t capacity. All these underestimates need to be considered in order to develop realistic controls.

Page 2 – 12 - 2.9 Vehicle Access to the Site

Objection 18 – "Real" traffic movement figures need to be used in the Traffic Study, as well as be reflected in the EIS. The Pacific Hwy has changed dramatically over the past few years, given the massive development in this region, and is now an extremely busy road which will only increase over the coming years. Without proper hard controls to address this increased traffic flow and its interaction with the recovery facility trucks, there is real potential for a catastrophic fatal collision at the point where trucks access the Quarry from the Pacific Hwy.

Objection 19 - Given there are no plans for the facility's roads to be sealed, all trucks leaving site will carry a clay / sandy dust on their tyres and under carriage. Nothing in this EIS considers this risk and what controls are to be put in place to address this pollution issue and potential hazard to the environment as well as to traffic visibility and control when on the Pacific Hwy. Controls need to be designed into this facility to address this potential risk.

Page 2 – 13 – "Fire control measures are in place"

Objection 20 – in 2013 there were catastrophic fires in this area and given the recycling facility will store stockpiles of mulched timber it is not sufficient for the EIS to just state "Fire control measures are in place". The EIS should include a specific Fire Management Control Plan for this site to address this potential risk particularly given the sensitive nature / high fire prone area of the proposed facility's location.

Page 2 – 17 –2.11.2 Proposed Water Management

Objection 21 - Figure 2.10 Map showing the location of proposed catchments and Figure 2-11: Configuration of amended North Pit Catchments – these Figures contradict each other as Figure 2 – 11 shows dirty water flowing from N3 catchment / Dam 6 into creeks and the Munmorah State Recreational Park whereas Figure 2-11 shows dirty water flowing back into N3 catchment / Dam 6, however there is no explanation for this. Are both figures correct, please explain?

Page 2 – 20 –Figure 2-13: Cross section of Tip and Sort Area.

Objection 22 – given the facility's environment sensitive location the use of clay and road base for the tip / sort area is a simple and cheap design which provides no guarantee to prevent contaminated water finding its way into the sandy subsoil and into the Recreational Parks ancient wetlands and onto the ocean.

The engineering / civil design for this facility needs to be commensurate with its location and have built into its design robust controls to prevent ground water pollution. Good design would mean a concrete sloped hardstand / concrete drains / sump with permanent automatic pump installation to guarantee contaminated water control in the event of a major downpour.
Putting tarps over stockpiles during major rain events is extremely difficult and a harder design control should be implemented to manage this risk.

Objection 22 – The EIS needs to provide design details for water / contaminant management of the Recycled Products open stockpile area + 10% landfill waste + fly ash area + mulched timber stockpile area.

Page 2 – 21 – Water Balance – Historical rainfall data from the Nora Head Lighthouse have been used for the years 1970 to 2003.

Objection 23 – why does rainfall data used in the EIS stop at 2003 as it should include the most recent data storage? The EIS needs to be updated so it incorporate the most recent rainfall data to reflect current trends.

Page 2 – 23 – Waste Management

Objection 24 – 10% of material will be truck off site for landfill – this 10% has not been included in the truck movement / traffic count? Also, the storage of this material needs to be shown on the site plan?

Page 4 – 2 – 4.2 Community Consultation

"The Site is located within an area operated as an existing extractive industry and there are no residences in close proximity to the Site. It was considered that there was no requirement for community consultation as part of the assessment process."

Objection 25 – it is inconceivable for the EIS to say "there are no residences in close proximity to the Site. It was considered that there was no requirement for community consultation as part of the assessment process." Catherine Hill Bay Heritage Village is nearby and a new development is under construction whereby 550 homes will be built with possibly over 1000 additional residents within relatively close proximity (800m) to this proposed facility. Consultation with the community and Lake Macquarie City Council is imperative to ensure the EIS reflects this facility's location and its sensitive nature given this location.

Page 6 – 20 – 6.10 Management and Mitigation Measures

RE; DUST, States "The proposed development will employ a number of best practice mitigation measures on-site to ensure that dust impacts are minimised. Measures to be employed include:
• Use of a water cart to control emissions from haul roads (unsealed).
• Enforcement of speed limits onsite.
• Progressive rehabilitation of exposed areas.
• Minimising drop height of material during truck loading and unloading where possible.
• Management of dust generating activities during unfavourable meteorological conditions. "

Objection 26 – for the proposed facility to mitigate dust the above stated "best practice mitigation measures" are certainly good but not "best practice" for a site like this and its location. Additional measures (hard controls) are required to meet best practice for optimum long term dust mitigation and minimum pollution to the surrounding environment including Park, ancient wetlands, fauna and residence. Considering this proposed facility is a long term project and to match the sensitive nature of this facility's location, additional controls should be considered and included in the design of this facility. These controls follow:

1. All roads that trucks travel on should be sealed
2. All stockpiles / bins installations to have concrete hardstands with appropriate water management drainage / pump out controls
3. All trucks prior to leaving site are to have their tyres and undercarriages washed
4. All stockpile / bin installations to be protected from southerly winds by concrete walls or grassed berms / bunds that are built to a height of the predicted stockpiles, i.e. minimum 6m
5. Mandatory covering of all loads prior to leaving site
6. Fixed water spray systems to be installed in dust prone areas

Page 9 – 9

9.8.4 Sediment Dam Spillways - "Spillway designs have been calculated for the dams directly into the downstream"

Objection 27 – Designs for 2 spillways are built into this proposed facility and these are for Dams' 10 and 1 using the Blue Book recommendation to design spillways for a 1 in 100 year ARI storm event. Given the proposed facility is a long term project and considering the facility is located adjacent to the Munmorah State Recreational Park with dams / spillways feeding water courses that flow through the Munmorah State Recreational Park's ancient wetlands and then onto the publicly accessible Moonee Beach, the spillways designed for Dams 10 and 1 should be permanent installations using concrete NOT clay which has a greater potential to deteriorate over time and fail.

"Best practice mitigation measures" should be built into these dams and spillways because if they fail the consequences to the downstream environment could be catastrophic.

Page 9 – 15

9.15 Rehabilitation

As the Site is progressively rehabilitated, the rate of entrapment of sediment and erosion will decrease.

Objection 28 – based on this EIS's photos it would appear that very little rehabilitation has been done to this site since commencement of operation more than 30 years ago. To ensure there is a real commitment to rehabilitation of this site the principal should submit a formal written Rehabilitation Management Plan. This Plan to cover the existing site, as well as the future site, including major areas / activities and timelines. This Plan to be developed for the life of facility prior to DA approval being considered?

Also, why does dirty water flow from Catchment N3 / Dam 6 directly into the Munmorah State Recreational Park? This should not be allowed and all site water when leaving site should be via Dam 10 and Dam 1.

Page 9 – 18

9.19.3 Erosion and Sediment Control

"Erosion Controls
• Ensuring rehabilitated lands have effectively reduced the erosion hazard and initiate upgrading or repair as appropriate."

Objection 29 – based on EIS photos it would appear that very little rehabilitation has been done to this site. To ensure rehab is done properly the principal should prepare and submit, prior to DA consideration, a Rehabilitation Management Plan for the current and future sites, including major areas and timelines, developed for the life of facility?

Page 9 – 18

9.19.3 Erosion and Sediment Control

Erosion Controls

• Stockpiles to be visually assessed at time of forming to check they do not exceed 3 metres high.

Objection 30 – Figure 2.4 Layout of recycled product bins – This figure title is misleading as this layout shows stockpiles **NOT** "bins"!

These stockpiles cover a large area of approx. 100m wide x 70m long and are shown as 6m high. As the Erosion Control section restricts stockpiles to 3m, why are the stockpiles in Figure 2.4 shown as 6m high?

Page 10- 2

10.2.2 Traffic Flows

"An intersection survey was conducted on Wednesday 20th May 2015 at the site entrance along the Pacific Highway between the times of 5:00am – 10:00am and 2:00pm - 7:00pm, representing a typical weekday."

Objection 31 – given the extreme importance of understanding the proposed facility's heavy traffic interface with traffic along the Pacific Hwy, this objection is that one 10 hr. survey is not sufficient to draw long term conclusions about traffic flow and traffic controls.

These figures are not current and therefore not accurate and misleading as this survey was done in May 2015 and traffic movement since May 2015 has increased considerably.

Also, the 550 houses to be built at Catherine Hill Bay could put at least another 550 vehicles on the Pacific Hwy every day!

Page 10- 2

10.2.2 Traffic Flows

"Historic tube counts conducted on the Pacific Highway at Nords Wharf, approximated 3.5km north of the Site, from Monday 17th June to Wednesday 26th June 2013 by the RMS indicate average weekday peak volumes of 1527 and 1615 in the AM and PM peak periods respectively and are in agreement with the above data. The complete RMS tube count data is shown in Annexure D of the McLaren Report."

Objection 32 –the objection is that this EIS needs to use current RMS traffic figures and not figures taken from June 2013! Traffic movement along this section of the Pacific Hwy has increased considerably since 2013, hence these figures are not a true representation and understate current trends.

Also, the traffic study has not considered the enormous amount of new development already undertaken or planned for this area. RMS needs to seriously consider the installation of traffic lights at the intersection of The Recycling Facility and the Pacific Hwy to address this current and future increase.

Page 10- 3

10.3.1 Traffic Generation

See Objection 17, i.e. Table 3's Figures assume all trucks bring waste in will take product material out. This is not a correct assumption and the Table needs to be reviewed to reflect a more accurate and realistic traffic flow regime. Also, 10% of material cannot be recycled and has to be taken off site, this additional truck movement has not been included in Table 3's figures! Also, the figures re based on 30t trucks and not all trucks will be 30t.

Page 10- 4

10.3.3 Projected Growth

"Based on the RMS AADT data from the Swansea counting site for the years of 1984, 2004 and 2010, a growth rate of 0.62% has been assumed to calculate the volume of traffic along the Pacific Highway in 2035."

Objection 33 –the objection is that the EIS is not using recent figures for their traffic flow study. It is an understated assumption by using a growth rate projection of 0.62% based on 1984 / 2004 / 2010 data.

Given the current and future housing development planned for this region, traffic movement along this section of the Pacific Hwy has increased considerably since 2010 and this trend will only increase…….much greater than 0.62%!.

Given the importance of getting this traffic study right it is imperative that current RMS data is used, as well as overlapped with the Department of Planning projections re; housing development in this region. The current EIS's traffic study is not a true reflection of current and future traffic flows for the Pacific Hwy and therefore provides misleading assumptions for risk control development that is "management best practice".

Page 10 – 8

10.7 Conclusion

"The impact of the estimated peak hour traffic generation of 14 truck movements (7 in, 7 out) and 16 car movements (8 in AM, 8 out PM) on the Pacific Highway / Site Access Driveway intersection have been assessed to have no detrimental impact based on the existing and estimated 2035 volumes along the Pacific Highway."

Objection 33 – as previously mentioned, the figures used to arrive at the conclusion section is flawed and needs to be reassessed given the above objections.

"It is, therefore, determined under AS2890.2 that the access is safe on the condition that no right turn is permitted for vehicles over 8 metres length."

Objection 34 – as greater than 8m long trucks are not permitted to turn right from the facility onto the Pacific Hwy, given the 300% (+) increase in traffic movement at this intersection then the EIS should state what controls are to be implemented at this critical intersection, re; driver training / signage / guide walls / etc?

To address this potential for an 8m vehicle to turn right, and it will happen, the traffic design for this intersection should include either traffic lights or a right turn safety bay running parallel with the Pacific Hwy.

11.3 Potential Impacts

"Potential social and economic impacts resulting from the proposed facility are generally positive. Adverse social impacts are associated with the potential air, noise, traffic impacts, and visual amenity. The facility would employ best management practices and mitigation measures to minimise the potential for adverse impacts upon the local environment such that any adverse social impacts would be negligible."

Objection 35 – this EIS addresses some but not all "best management practices and mitigation measures to minimise the potential for adverse impacts". Given the numerous environment / design / engineering / best practice gaps in this EIS, highlighted by the above objections, it is apparent that the proposed recycling facility's EIS should not be considered until such time as these gaps are addressed.

In summary, this EIS gives scant regard to:

1. The residence of the existing Catherine Hill Bay Heritage Village
2. The residence who will be building their dream homes at the new 550 housing development site under construction north / east and east of the proposed waste recycling facility
3. The Lake Munmorah State Recreational Park
4. Lake Munmorah State Recreational Park's ancient wetland that the Recycling Facility's water drains into

Also, the EIS understates the proposed facility's social impact when it comes to best practice re; dust mitigation, erosion reduction, water containment and spill, rehabilitation, as well as appropriate traffic control. These understatements need to be reviewed and updated to reflect current trends.

The proposed recycling facility is for a long term business, supporting infrastructure considered for this facility needs to reflect this and meet the criteria of being "best management practices and mitigation measures to minimise the potential for adverse impacts".

Based on the above objections the current EIS does not meet this "best practice" criteria.