

1 April 2021

Mr David Schwebel
Planning Officer, Industry Assessments
Planning & Assessment
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Mr Schwebel

Request for input to the Environmental Impact Statement for the St Marys Resource Recovery Facility (SSD-10474)

I refer to the request for SafeWork NSW to review and provide advice on the Environmental Impact Statement (EIS) for a Resource Recovery Facility at 25 Dunheved Circuit St Marys (SSD-10474). Thank you for the opportunity to comment on the proposed development.

The SafeWork NSW review is in relation to asbestos management (specifically the Waste Management Plan) and as such does not include other work health and safety obligations as required by the Work Health & Safety Act 2011 and the Work Health & Safety Regulation 2017.

Of note is the inclusion of reference material to *the NSW EPA (2014) Draft Protocol for managing asbestos during resource recovery of construction and demolition waste*. This document is not current or accessible to the public, and the applicant should seek advice from the Environment Protection Authority.

The following recommendations are provided for consideration in relation to the proposal:

The Waste Management Plan (version 1, dated 12/10/2020) refers to asbestos multiple times and is included in varying sections below.

- 1.3 Legislative requirements and related documentation
- 2.2.2 Timber processing
 - Load inspections at weighbridge
- 3.2.2 Waste inspection, acceptance, and non-conforming waste
 - Standard 1 Inspection requirements
- Appendix A – Non-conforming waste procedure
 - Asbestos Inspection Register
 - Steps to be undertaken for all incoming waste loads
 - Detailed inspection of incoming waste, and Asbestos Inspection Register
 - Initial inspection of incoming waste
 - Rejecting the load
 - Non-conforming waste suspected in stockpiles
 - Asbestos testing and notification
 - Further asbestos testing
 - Asbestos survey and sampling report
 - Removal of asbestos-contaminated waste

Training of workers in Asbestos Awareness

The Plan mentions trained personnel will inspect incoming loads from an elevated inspection point using video cameras and at spread inspection areas.

- Ensure trained personnel have received training as per Clause 445 of the WHS Regulation 2017.
- Training must include identification, safe handling and suitable control measures for asbestos or asbestos containing material.
- Consider the types of instances where asbestos may present at the facility in training ie
 - asbestos sheeting attached to timbers
 - asbestos debris stuck behind nails in timber
 - asbestos containing mastics and membranes adhered to timbers.

Personal Protective Equipment for asbestos

The Plan infers that any asbestos identified either at the weigh bridge or because of spreading in an inspection area that the load and the asbestos waste will be rejected. The plan also directs that only non-conforming materials other than asbestos can be handled, removed, and disposed of wearing appropriate personal protective equipment (PPE).

- Consider asbestos PPE being available if asbestos is identified during processing.
- What asbestos PPE would be required as a minimum?
- Removal and waste disposal.
- Decontamination procedures for workers, plant and the affected area.
- Clearance inspections.

Non-Conforming Waste Procedure

Sections 6.4, 6.5, 6.6 and 6.7 of the Non-Conforming Waste Procedure in Appendix A, refers to asbestos waste suspected in stockpiles. Sections 6.5 and 6.7 infer that these stockpiles are soil as the testing and sampling analysis is for soils.

- Review the above sections with regards to the term stockpiles as they relate to wood waste which the facility has proposed will be processed and not soil as listed.
- Develop a procedure for where asbestos is identified or suspected throughout the facility processes with regards to identification, safe handling, and suitable control measures.

Management of hazardous, toxic and liquid waste

Section 4 of the Non-conforming Waste Procedure is the management of hazardous, toxic and liquid wastes. It infers that Attachment 1 contains the procedures for managing these hazards in an emergency. Attachment 1 was not able to be located within the Plan.

- Ensure if asbestos is unexpectedly processed through a shredder or other processes that make safe procedures are implemented immediately with regards to worker safety.
- Include dust suppression, signage and barricades.
- Engagement of suitably qualified asbestos consultant ie: Licensed Asbestos Assessor or an Occupational Hygienist to inspect and determine contamination.
- What remediation actions are required to decontaminate the site?
- Decontamination of plant, equipment, site and workers.
- Clearance inspections deeming safe to re-occupy areas, plant etc.

SafeWork NSW would like to be given the opportunity to review processes and procedures once the approval has been granted and the project has progressed, and more detailed information is available.

Should you require clarification of any issue raised in this submission please contact Mr Jason Wall, Assistant State Inspector, Asbestos and Demolition Services at jason.wall@safework.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Karyn Davidson', with a stylized flourish at the end.

Karyn Davidson

Manager, Asbestos and Demolition Services

Chemicals, Explosives & Safety Auditing

SafeWork NSW

Better Regulation Division, Department of Customer Service