

Submission - Genesis Waste Management Facility Modification 6 (MP 06_0139 MOD 6) - Hour of operation and landfill cap

I wish to lodge mine and my husband's objections to the proposed increase in the operating hours and volume of waste to be received at the Genesis Waste Management Facility at Eastern Creek.

Our main objections are:

- 1) The increase in volume to 1,000,000 tonnes per annum is a massive increase in the current amount accepted at the landfill part of the facility. The original approved receipted volume was set at 700,000 tonnes per annum when this facility was given consent. Obviously this figure was set by the approving authorities for a reason. What has changed to the reasoning behind the original approval to allow an increase of 42.86% to the allowable waste figure?
- 2) The ensuing 42.86% increase in waste receipt will increase truck movements by a similar amount and will add to an already congested traffic area. The proponent claims that by being allowed to operate 24 hours a day that this will disperse the traffic over that period. What studies and data do they have to back up such a claim? As the majority of construction companies work within the hours that the Genesis facility already operates (not overnight) the additional volume of traffic / truck movements will be more concentrated in the hours that are already approved. The increased truck movement will also add to both noise and air pollution within the area.
- 3) The northern end of facility is located 490 metres from houses in Minchinbury. Whilst the initial approval considered that the noise from the facility would be similar to that generated by the M4 Motorway, those consideration were based on the original approval and operating hours. The ambient background noise in the early morning hours now proposed have not been taken into consideration (i.e. the noise will carry further and seem louder in the middle of the night when there is no other major ambient background noise to help muffle it.
- 4) In the proponent's "Request to Modify SERARs final" document (Genesis Xero Waste Facility - Proposed Modification to Project Approval 06_0139 (MOD 6)) dated 19 August 2016 the proponent states 4 main reasons for the extended operating hours.
 - a. "To accommodate loss in production time arising from the operator's commitment to ensuring a safe and efficient work environment". This is obviously the operator's obligation under law. What has this got to do with extending operating hours to 24 hours a day? Could we read into this that if they aren't allowed to operate 24 hours a day that the facility will not have a safe work? Obviously, all businesses must ensure that they operate in a safe working environment regardless of when they operate. In fact, running a 24 hour per day operation comes with a whole new raft of issues to consider when account for tired workers operating heavy machinery on overnight shift work.
 - b. "To facilitate acceptance of loads of waste received from night project". Once again, where is the data to back up this claim? The proponent asks for a 42.8% increase in waste receipt. The amount of waste required to be delivered overnight from road construction to the Genesis facility would be minimal and would hardly justify the granting of a 24 hour per day operating licence.
 - c. "To facilitate the acceptance of loads of waste during the operation of large projects". Once again, these "large projects" (that are as yet unnamed or identified) operate during normal

construction times (mainly daylight hours). The necessity to operate a facility 24 hours a day from such unidentified “large projects” is not addressed and cannot be used as a qualification to extend the facility’s operating hours.

d. “To help streamline and facilitate the proper removal and disposal of asbestos and contaminated soils by providing a facility which can receive such material with longer operating hours”. How can the proponent expect this to be considered as a serious reason for extending the operating hours to 24 hours per day? Do they seriously believe that an illegal asbestos dumper will decide at 2:00am in the morning that they will now “do the right thing” and visit the Genesis facility rather than illegally dump their waste? This excuse to operate the facility 24 hours per day is not acceptable and should not be taken as a serious proposal from the developer. They claim that “the extended operating hours may have a positive effect in the community by decreasing illegal dumping of such substances...”. What facts or evidence is this statement based on? The current operating hours of the Genesis facility are more than ample for genuine law abiding construction and demolition contractors to dispose of waste in a legal way.

The proponent’s reasons for asking for extension to these hours appear to be flimsy and based on little or no fact, only supposition. Surely approval cannot be considered based on baseless ideas that extending hours of operation may help large projects dispose waste out of normal hours and help deter illegal asbestos dumping or even help improve the safety of their operation’s work environment. The proponent has already been granted extensions to their operating times in previous applications. There is no apparent reason for the proponent to seek extension to the hours of operation and the volume that can be received other than for the proponent’s financial gain. The fact that this facility lies within 500 metres of local housing and that the noise that it will produce in the early hours of the morning makes this facility unacceptable for 24 hour operation. The increased truck movements that would come with an increase in allowable waste acceptance at the facility (mainly during their current operating hours) is also a major concern with local roads already overloaded. I ask that the governing bodies that consider such applications look into the original approvals and objections for this facility and consider the reasoning behind the original development approval and the constraints within. I strongly oppose the application and believe that it should be rejected and urge the NSW Planning and Environment Commission to consider the aforementioned reasons also.

Finally, I would like to state that there was not a lot of time to understand this and read through it all, even though it is only a modification. It is confusing and not easy for residents who are not used to doing these.

Yours truly

Stephen & Kerri Bradbury

Minchinbury residents for 29 years