

(1405)

CONFIDENTIALTO: ASHLEY CHENG

(PLANNING & INFRASTRUCTURE)

NEELIAS CYNELIA WASTE RECYCLING PROPOSAL2013SSD: 4964

DEAR ASHLEY,

PLEASE SEE OUR CONCERNS ABOUT THE ABOVE PROPOSAL.

WE APPRECIATE THE TIME EXTENSION AND THE OPPORTUNITY
TO READ THE EPA RESPONSE (WHICH DID ANSWER SOME
OF OUR QUESTIONS)

PLEASE CALL ME IF YOU NEED TO CONTACT ME, AS THIS IS NOT

MY FAX.

REGARDS,

PS. PLEASE DO NOT PROVIDE OUR PERSONAL INFORMATION TO
THE PROPONENT OR PLACE IT ON THE DEPARTMENT'S WEBSITE.
AS WE WISH TO REMAIN ANONYMOUS.

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VEDLIA'S CAMELLIA WASTE RECYCLING PROPOSAL: 2013SSD: 4964

WE OBJECT TO THE ABOVE PROPOSAL. OUR CONCERNS INCLUDE:

1) A LACK OF COMMUNITY CONSULTATION. RESIDENTS WEST OF JAMES RUSE DRIVE AND THOSE EAST OF THE SITE (IE IN SILVERWATER & NEWINGTON) HAVE NOT BEEN CONSULTED, YET THEY ARE CLOSER THAN OTHER SITES SUCH AS PARRAMATTA SPEEDWAY, WHICH IS NOTED AS A FACILITY IN THE NEIGHBOURHOOD.

WHILST THE INDUSTRIAL NATURE OF THE PENINSULA IS IDENTIFIED CORRECTLY, THE SOCIO-ECONOMIC DATA ABOUT ROSEHILL IS OUT OF DATE (BASED AS IT IS ON ABS DATA FROM 2005 CENSUS).

WHY NOT USE MORE RECENT ABS DATA FROM THE LAST CENSUS (2011)? THIS DATA INDICATES THAT THE POPULATION DENSITY IN ROSEHILL IS NOT IN DECLINE, BUT IS INCREASING RAPIDLY. THIS IS DUE TO ZONING CHANGES AND THE CONSTRUCTION OF HIGH RISE APARTMENT BLOCKS - MANY OF THEM ALONG JAMES RUSE DRIVE.

ANOTHER FACTOR IS THE CONTINUING EXPANSION OF THE UNI OF WESTERN SYDNEY (UWS) - ITS BACK BOUNDARY APPROX 1KM FROM THE PROPOSED FACILITY.

FURTHERMORE, IT IS MISLEADING TO PLACE ROSEHILL TOGETHER

WITH CAMELLIA AND THEN CLAIM THIS AREA IS PREDOMINANTLY

INDUSTRIAL. CAMELLIA IS BUT ROSEHILL, HARRIS PARK & PARRAMATTA ARE PREDOMINANTLY RESIDENTIAL AND GROWING RAPIDLY.

2) IT IS OVERLY OPTIMISTIC TO CLAIM THAT THE PROPOSAL'S IMPACT ON THE VISUAL ENVIRONMENT IS LESS THAN SIGNIFICANT.

THE 'RIVERCAT' IS NOT ONLY A COMMUTER FERRY BUT A TOURIST ATTRACTION, AS IS THE PARRAMATTA RIVER. ANY BUILDINGS ALONG THE RIVER SHOULD BE ENHANCING THE WATERWAY, NOT EXCEEDING HEIGHT LIMITS. THIS BUILDINGS SIZE AND BULK WILL BE AESTHETICALLY UNAPPEALING TO RESIDENTS & TOURISTS ALIKE.

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3) THE POTENTIAL HAZARD ANALYSIS AND RISK ASSESSMENT IS FLAWED, ITS CLAIM THAT "THERE ARE A LIMITED NUMBER OF SCENARIOS WITH OFFSITE IMPACT AND THEREFORE CUMULATIVE AND SOCIETAL RISK IS NOT REQUIRED." (7.3.4) (VELLIA'S EIS, FEB 2013) IS INCORRECT AS THESE SCENARIOS CAN NEVER BE EXHAUSTED. (HENCE NEW APPROACHES TO BUSINESS CONTINUITY PLANNING FOCUS ON RESOURCES NOT SCENARIOS.) THE FEW SCENARIOS CONCEPT SUGGESTS A LACK OF IMAGINATION AND/OR EXPERTISE. ITS ALSO EXTREMELY RARE, NOT TO CONSIDER THE PROBABILITIES OF EVENTS WHEN DETERMINING THEIR RISK LEVELS, AS MUCH CAN AND WILL BE LOST BY OMITTING THIS STEP. (RISKS NOT EXAMINED FULLY, CANNOT BE APPROPRIATELY MITIGATED AND RESIDUAL RISK CANNOT BE IDENTIFIED. THE APPROACH TAKEN DOES NOT SHOW A DUTY OF CARE TO THE COMMUNITY.

4) BREAKING THE CAP IS A SIGNIFICANT ISSUE AS THE SITE'S SOILS ARE CONTAMINATED BY CHROMIUM (VI) AND "A SIGNIFICANT AMOUNT OF ASBESTOS-CONTAINING MATERIAL IN THE SURFACE SOILS AND ALONG THE BANKS OF THE PARRAMATTA RIVER" (SSOMP, 2009; QUOTED IN 7.7 OF VELLIA'S EIS, FEB 2013).

MUCH MORE INFORMATION NEEDS TO BE PROVIDED ABOUT HOW MUCH OF THE CAP WILL BE BREACHED AND FOR HOW LONG, BEFORE THE COMMUNITY COULD FEEL COMFORTABLE ABOUT THE PROPOSAL. THE TREATMENT OF ^{POTENTIAL EXPOSURE TO} ASBESTOS FIBRES, ^{ASBESTOS} WITHIN THE SOIL, BOTH UNDER THE CAP AND WITHIN THE EMBANKMENT, IS NOT ADEQUATELY CONSIDERED FROM THE LOCAL RESIDENTS' PERSPECTIVE, DESPITE ITS WIDELY KNOWN HEALTH IMPACTS AND THIS SITE'S PROXIMITY TO THE JAMES HARDIE SITE.

TO ALLAY CONCERNS, ONE EXPECTS MORE THAN THE STATEMENT THAT "AN INDUSTRIAL HYGIENIST ... WOULD BE ON SITE AT ALL TIMES DURING THE EXPOSURE OF THE CAPPING LAYER" AND THAT ACTIONS

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WILL BE TAKEN IN ACCORD WITH THE ASBESTOS MANAGEMENT PLAN, WHICH IS TO BE PREPARED. (7.7.3 VEDLIA'S EIS, FEB 2013)

THIS EXPECTATION IS RE-INFORCED BY THE CMJA INVESTIGATION IN 2009 WHICH FOUND "SIGNIFICANTLY HIGHER CONCENTRATIONS (UP TO 3000 mg/kg) OF CR (VI) IN THE FILL MATERIAL" AND "A SIGNIFICANT VOLUME OF (ACM) ASBESTOS CONTAINING MATERIAL WAS ALSO UNearthED IN THE NORTHERN PORTION OF THE SITE"

(2.3 OF SSEMP - 37 GRAND AVE, CAMELLIA) GIVEN THAT ASBESTOS FIBRES COULD BE BLOWN ~~HERE~~ INTO PARRAMATTA'S CBI THE COMMUNITY'S POTENTIAL EXPOSURE SHOULD HAVE BEEN

FLAGGED (PARTICULARLY THOSE LIVING CLOSEST TO THE SITE AND THOSE ATTENDING PTDALMORE PUBLIC SCHOOL - THIS SCHOOL'S BOUNDARIES BORDER SOUTH AND JOHN STS.)

MOREOVER, AS FREQUENT FERRY TRAVELLERS, ^{TO DATE} WE HAVE NOT NOTICED ANY SIGNAGE - AS DIRECTED IN CMJA'S SSEMP 2009 - TO ALERT THE PUBLIC TO POTENTIAL DANGERS AROUND THIS SITE'S NORTHERN RIVERBANK.

5) DUST AND ODOUR IMPACTS ARE INADEQUATELY ANALYSED GIVEN "MONITORING FOR DUST DEPOSITION, ... HAS BEEN UNDERTAKEN AT THE SITE FOR 2 MONTHS, THIS MONITORING IDENTIFIED THAT THE LEVELS OF TOTAL SOLIDS WERE ABOVE THE EPA CRITERIA FOR DUST DEPOSITION" (7.2.1. VEDLIA'S EIS, FEB. 2013).

IF DUST DEPOSITION IS ABOVE EPA CRITERIA, SHOULDN'T THIS BE INVESTIGATED AND REDUCED TO ACCEPTABLE LEVELS, BEFORE PROPOSALS FOR ADDITIONAL WORKS - BE THEY CONSTRUCTION OR OPERATIONAL, BE CONSIDERED?

ALSO, IF EXISTING AIR QUALITY MEASURES AT CHULLORA

PLEASE DO NOT PUBLISH OUR PERSONAL INFORMATION.

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ARE NOT REPRESENTATIVE OF CAMELLIA, WHY ISN'T AIR ON SITE AT CAMELLIA BEING MEASURED?

AFTER ALL, THE EIS FOR THIS PROPOSAL ADMITS THAT DURING CONSTRUCTION, THE LOCAL AIR COULD POTENTIALLY BE IMPACTED BY DUST GENERATION (INCLUDING ASBESTOS FIBRES AND EXHAUST EMISSIONS).

AN ACCURATE BASELINE IS NEEDED, AS IT IS IRRESPONSIBLE TO PLAN CHANGES THAT ARE POTENTIALLY NEGATIVE, WITHOUT KNOWING THE CURRENT STATE. HOW CAN APPROPRIATE ACTIONS TO ENSURE HEALTH AND SAFETY BE UNDERTAKEN, IF ~~(THE)~~ THE CURRENT POSITION IS UNKNOWN?

FURTHERMORE, IT WOULD BE PREFERABLE FOR DOOR MODELLING TO USE THE MOST RECENT AVAILABLE DATA (NOT 2020 FIGURES) AS THIS WOULD INCREASE THE MODEL'S VALIDITY. IE. DISPERSION MODELLING, WOULD MORE ACCURATELY REFLECT THE CURRENT SITUATION.

6) NOISE IMPACTS, PARTICULARLY DURING CONSTRUCTION ARE ANOTHER MAJOR CONCERN.