

SUBMISSION BY

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QUALITY CASTINGS PTY LTD

42 VIOLET STREET, REVESBY NSW

SUBMISSION ON SSD 7349 REVESBY RESOURCE RECOVERY FACILITY

I am the beneficial owner of 42 – 50 Violet Street Revesby. This property is located directly opposite the site of Enviro Recycling at 37-51 Violet Street.

I object to the proposed expansion of the resource recovery facility on the following grounds;

- Excessive dust pollution
- Excessive noise pollution
- Possible major health hazard of airborne asbestos dust
- Excessive truck traffic in Violet Street

As our site is directly opposite so I have had ample opportunity to observe the operations of Enviro Recycling since the current operations commenced about two months ago.

I have observed the following issues;

DUST POLLUTION

Enviro Recycling operates concrete crushing and sizing machinery in the open yard opposite my factory. The crushing operation produces a large amount of dust from the crushing operation and also the loading of the crushers and the transporting by conveyor and dumping of the crushed material. These activities are all done in an open yard.

Although there is a rudimentary attempt to use water spray to reduce this dust it is largely ineffective. Enviro uses a water spray located at the south western

end of the yard. But the spray coverage is insufficient to reduce the fine dust that is transported out of the site to neighbouring properties including my own.

There is also no guarantee that the water spray dust reduction will actually be operated when crushing is done. I have observed several occasions when crushing is done without the spray being operated.

The wind direction is critical to the dust emissions to Violet Street. When the wind is from the westerly direction no problem is experienced, but when the wind is from the east or north east which is the prevailing Summer direction there are unacceptable amounts of fine dust blown on to my property. This dust is evident on any cars parked in my premises and can be tasted and felt in the back of the throat by persons in my premises.

The following pictures show dust on a car parked in our parking area for a period of less than 6 hours.





The fine dust can be seen at the bottom of the windscreen on the car.

This airborne dust would have silicosis hazards as well as possible crushed asbestos content.

The Cardno SSD application report Section 4.6.3 states that further assessments will be undertaken by Enviro. To my knowledge no assessments or measurement of the dust emissions has yet been undertaken by Enviro.

Of particular concern is that the dust emissions that are currently unacceptable and unmonitored will increase by eightfold if the increased capacity of the plant is approved by State Planning NSW.

The crushing plant should be located in an enclosed shed that is ventilated by dust extraction equipment including filtering exhaust air and passing exhaust air through a wet scrubber. Although this would be costly it is a necessary part of the equipment required to recycle concrete and building waste that may contain asbestos in a manner that is not hazardous to the public. It is a legitimate cost of doing the recycling business and should not be avoided by operators profiting from this business at the expense of the health and safety of neighbours and the community.

EXCESSIVE NOISE POLLUTION

Due to there being no wheel wash facility at the Enviro plant trucks are now leaving the plant with mud on their wheels which is deposited on to Violet Street. Presumably to clean up this mud on Violet Street Enviro has been using road sweepers to spray and vacuum the Street on an almost continual bases.

These vacuum road sweepers are extremely noisy vehicles and already I have complained to Enviro about this. The vehicles travel up and down the Southern half of Violet Street and do U turns at either end of their run. They have been known to pass our offices thirty or more times a day.

The noise of these vehicles passing our offices makes it extremely hard for my employees to concentrate on work and makes it unattractive to work in the environment created. If this was to continue I would have to double glaze our windows and build a solid front boundary wall.

Despite the sweepers the street is often dusty or muddy so as to make trafficking cars filthy when they drive down the street.

Although Enviro has said that it is installing a wheel wash, no continuance of the operations should be permitted until this is completed and it is proved that

the street sweepers will no longer be necessary to maintain the street in a reasonable condition.

POSSIBLE ASBESTOS DUST

A Clean Up Notice of the EPA NSW dated 30 May 2016 was issued to Enviro Recycling that disclosed asbestos found on site in the 'North West 'area. This is directly opposite my property and amongst the material that is crushed.

This is an extremely concerning health factor for employees on my property or any neighbouring property including residential areas nearby. In a northerly wind asbestos dust could be transmitted to Revesby residential areas.

Enviro has stated that they will monitor loads on trucks as they are received, but obviously they could only see the top layer of any truckload. What is beneath could be asbestos from demolition sites. In addition due to the high cost of disposing of asbestos it is entirely feasible that a deal could be done with employees of Enviro to ignore the contents of a truckload of demolition materials.

For this reason it is imperative that all dust emission remain on site and crushing is not done in the open yard.

The only way to ensure the health of the community is to do the crushing in a fully enclosed building with dust extraction and water scrubbing.

EXCESSIVE TRAFFIC IN VIOLET STREET.

Violet Street is in an Industrial area and therefore all businesses including our business are periodically serviced by large trucks. This naturally occasionally causes some hold ups in the street already.

I have read the Cardno report on traffic created by the expansion of the plant to 250,000 tonnes per year which states that the increase of truck movements would be negligible.

I have already observed up to 3 B-Double trucks waiting in line in Violet Street to enter Enviro's plant. There were extensive traffic delays on that occasion and the southern end of the street resembled a muddy country road by the time they had dropped their loads.

The fact is that 250,000 tonnes represents 25000 incoming truck movements at an average of 10 tonnes per truck. At a five day week for 48 weeks allowing for the Christmas break there are 240 working days, which makes about 104 movements a day, or 13 per hour in an eight hour day or one every 4.6 minutes if they were equally spaced throughout the day which is most unlikely.

In addition if these are the trucks coming in with demolition materials then there will be about half that number again leaving with processed material.

If all these trucks have to pass through the proposed wheel wash before exiting the site then the wash cycle will be necessarily brief and the roads will be mud tracks.

Based on the above calculations I cannot accept that there will not be excessive traffic in Violet Street to the detriment of all other existing businesses.

CONCLUSION

For the above reasons I strongly object to the proposed expansion of the Enviro Recycling Plant in Revesby.

This is just the wrong location for this plant , which should be located much further out from the populated areas of the city including areas of employment like the Revesby Industrial Area.

The recycling business should include not just the crushing and sorting equipment but all the necessary dust suppression and emission equipment required to prevent polluting emissions.

While Mr Bruce Fordham may be passionate about Recycling, he is no doubt even more passionate about his profits, but somewhat less caring about polluting the community in which he operates his business.

NSW Planning and Environment should reject this application unless it is proved that all emissions are retained and processed in the site and the activities are scaled down to fit the location of the site with regard to other peoples' amenity within the area.

