



11 November 2016

NSW Department of Planning & Environment

GPO Box 39
Sydney NSW 2001

Attention: **Sheelagh Laguna**
Senior Planning Officer

Dear Sheelagh

OBJECTION: State Significant Development Application No. 15_7349 - Revesby Resource Recycling Facility, 37-51 and 57-67 Violet Street, Revesby.

1.0 Introduction

Environmental Earth Sciences NSW was commissioned by Nubent Pty Ltd and Bituminous Products Pty Ltd to review planning documents on public exhibition and assist in preparing an objection to the proposed expansion of the existing resource recovery facility located at 37-51 & 57-67 Violet Street, Revesby NSW (SSD 15_7349).

The documents reviewed include:

- Cardno (NSW/ACT) Pty Ltd, 23 October 2015, *Revesby Recycling Facility – State Significant Development Application Report (reference: 59915106 R001 SSD Application Report v3)*
- Cardno (NSW/ACT) Pty Ltd, 29 September 2016, *Waste Recycling Facility, Nos 37-51 & 57-67 Violet Street, Revesby, Environmental Impact Statement (EIS) (reference: 59915106 Draft v3)*
- NSW Department of Planning & Environment (DPE), *SEARs for the Revesby Recycling Facility (SSD 7349)*, letter to Enviro Recycling Pty Ltd dated 20 November 2015.

Following the document review and a visit to the site, this objection has been prepared based on the following issues / concerns regarding:

- insufficient consultation;
- site location;
- air quality;
- traffic;
- noise and vibration; and
- soils and contamination.



2.0 Consultation

Section 7 of the EIS indicates that Enviro Recycling personally distributed a neighbour consultation letter regarding this SSD application (Section 7.1.3.1).

- we argue that this neighbour consultation did not take place as stipulated, as representatives at Bituminous Products Pty Ltd (33 Violet Street, Revesby) indicate that they did not receive the letter notification as presented within Appendix K (letter addressed to "To Whom It May Concern" dated 22 April 2016) of the EIS. No confirmation is given that the listed neighbours were presented with these letters.

In addition, no notification was given to landowners (Nubent Pty Ltd) or tenants (Vulkan Advanced Engineering Pty Ltd and Billabong Water Pty Ltd) of 35 Violet Street, Revesby (see Table 7-3).

- as 35 Violet Street is situated on the northern boundary of the development site, it would be assumed that consultation would be required with all parties (land owner and tenants) with regards this application.
- Nubent Pty Ltd was first notified of this SSD application through a letter from DPE dated 11 October 2016.
- Vulkan Advanced Engineering Pty Ltd and Billabong Water Pty Ltd have had no formal notification given.

Section 7.2 of the EIS also states that 'during the exhibition of the EIS... Enviro Recycling would place the EIS on their website'.

- A review of Enviro Recycling's website (www.envirorecycling.com.au) undertaken by Environmental Earth Sciences on 8 November 2016 identified that this document was not located on the website, and the website makes no mention of the development application or proposed expansion of operations.

As insufficient consultation has taken place, the landowners and tenants of these properties have not had sufficient time to review all documentation or discuss any issues or concerns that they may have with the development.

3.0 Recycling Facility Site Location

This Waste Recycling Facility is located in a Commercial/ Industrial area that is predominantly a manufacturing area. While this development site has been used for scrap metal recycling in the past, Enviro Recycling introduced C&D materials recycling to the site in 2015. Since this time, the impacts to the surrounding environment (dust, noise, vibrations, amenity etc.) have increased and adversely affected neighbouring properties and businesses.

The manufacturing industry has made an important contribution to Australia's economic development. The manufacturing sector contains and advances the skills and capabilities that allows Australia into the ranks of the advanced nations of the world. In addition, Australia's success in innovation is linked to our traditional prowess in manufacturing.

The location of a Waste Recycling Facility in a Commercial / Industrial area that is predominantly a manufacturing area is not an appropriate fit or conducive to supporting the manufacturing industry and production processes in this area. The impacts from current



operational processes (load out, sorting, crushing, screening, stockpiling etc.) following the inclusion of C&D waste materials at the site has decreased the viability of manufacturing businesses adjacent to this site due to, in particular, the generation of depositional dust.

4.0 Air Quality

Section 5 of the EIS indicates that an Air Quality assessment has been undertaken for this development application. This assessment is considered insufficient due to the following reasons:

- no site specific monitoring and measurements were taken;
- the measurements adapted for modelling purposes came from a site over 6km from the development site, in an area where it is unlikely that significant dust generation would occur and unlikely to be impacted by dust generation from the development site;
- no data was available for TSP concentrations or dust deposition levels from the adopted data source; and
- the assessment is focused on the nearest residential properties as the most sensitive receptors and does not take into consideration the neighbouring properties and the operations these neighbours conduct (i.e. laser cutting, electronics, spray painting, manufacturing, etc.).

The impact to air quality at the neighbouring properties under the current operations at the Enviro Recycling site is significant. Depositional dust is visible on all surfaces, both outside and inside buildings (see photo plates 1 to 4, Attachment A). This depositional dust is a significant concern because of:

- the potential health impacts of breathing in and ingesting this dust;
- the safety concerns of this dust creating a slip or fall hazard by creating slippery surfaces in work areas and stairwells;
- the operational impact this dust has on the manufacturing businesses adjacent to this facility that require a 'dust free' environment to operate (i.e. laser cutting, electronics, etc.); and
- the current controls and mitigation measures in place to reduce the depositional dust are insufficient.

Attachment B contains a copy of previous communications from Nubent Pty Ltd and Bituminous Products Pty Ltd written to a number of parties (including the NSW Environment Protection Authority and Bankstown City Council) with regards to concerns about air pollution amongst other concerns.

If this SSD application to increase the operational capacity of the recycling centre is approved, it is assumed that the dust levels will also increase. As dust depositional levels are already a cause for concern, any increase to depositional dust amounts would be considered detrimental to the surrounding businesses (as discussed in Section 2 of this letter).

As current air quality management systems on site are insufficient or unsuitable for the current operating practices of the recycling facility, it is considered that management systems proposed within the development application will also be insufficient and unsuitable once capacity is increased.



5.0 Traffic

Section 5.3 of the EIS states that '(t)raffic impacts on the local surrounding road network are not expected to be significant during either the construction or operation of the proposed Recycling facility'. Traffic impacts on Violet Street due to current operations are already creating concerns with regards to congestion and safety. By increasing operations and traffic movements 8-fold, these congestion and safety concerns become significant.

The EIS states that 'Violet Street is 10-12 m wide and is suitable for trucks, trailers and semi-trailers' (Section 5.3.1). While the street is wide enough for the passage of trucks, it is not wide enough for the trucks to stop within the street while waiting for access to the recycling facility, which is common practice during current operations (see photo plate 5, Attachment A).

In addition, the street sweeper that Enviro Recycling use to tidy up dirt and dust issues on Violet Street often travels at low speed in the centre and on the wrong side of the road.

The traffic operations introduce the following issues / concerns not addressed within the EIS:

- the stopping of trucks within the roadway, and the use of the street sweeper effectively reduces Violet Street to a one-way street which necessitates traffic moving to the wrong side of the road to pass or overtake these vehicles;
- the visibility for vehicle drivers behind or driving around or overtaking these stopped trucks is reduced significantly and has not been addressed within the traffic studies undertaken as part of this EIS and development application; and
- these stopped trucks also block off access to street parking and driveways for employees of and visitors to neighbouring companies, thereby increasing traffic congestion on Violet Street.

The management and mitigation measures listed within Section 5.3.3 does not provide any advice on how congestion and reduced visibility will be managed on Violet Street as trucks stop and wait in the roadway for access to the facility.

6.0 Noise and Vibration

Neighbours to this facility should be able to expect to have the quiet enjoyment of working within their property. The levels of noise coming for current operations have already exceeded 90dB on a number of occasions (see photo plate 6, Attachment A) as measured by Nubent Pty Ltd representatives while on site at 35 Violet Street, Revesby.

- these measurements already exceed the maximum noise emission criteria set out within the current EPA licence (L3.1 Noise from the premises shall not exceed 70 dB(A) from the nearest industrial boundary).

It is proposed that the location of Logger 1 within the EIS noise assessment (EIS Appendix D) did not truly represent the level of noise being omitted from current site operations. Truck movements in and off site would have been assessed (as stated within EIS Table 5-8), however loud operational noises which are focussed within the northern section of the site



(adjacent to the northern boundary which borders 35 Violet Street) would not have been appropriately assessed.

- neighbouring businesses adjacent to this boundary were not considered as sensitive receptors within the noise study even though current operational noises have adversely impacted these neighbours.

EIS Section 5.4.3.2 indicates that noise levels have also been assessed to each boundary of the site which are currently bounded by industrial and commercial receivers. The conclusion was reached that 'the current site EPA licence and INP industrial criteria of 70 dB(A) was predicted to be exceeded at all of the site boundaries for worst case operation, near to the site boundaries'.

- due to noise levels already being measured at significant levels above 70dB(A) at the neighbouring property, it is not considered that this criteria will only be exceeded during 'worst case' scenarios; and
- the increase of truck movements and the increased number of plant to be used on site under the proposed increased operations will most likely significantly increase noise levels at the site boundaries during normal operations.

In addition, vibrations caused by current plant and operational processes have already caused impacts to both human comfort and structural damage to buildings.

- Vibrations have already caused structural damage to walls, pylons and concrete slabs within the neighbouring property (see photo plates 7 to 8, Attachment A).

The levels of noise and vibrations during current operations have been uncomfortable enough for neighbouring site users to require ear protection or to stop work and leave site. This is considered to be a significant impact on human comfort for site users and visitors on neighbouring properties. This is not considered to be a sustainable or a reasonable mitigation measure.

It is not considered that the proposed noise and vibration mitigation measures outlined within the EIS will be sufficient to allow for the quiet enjoyment of neighbouring properties.

7.0 Soils and Contamination

A review of the NSW Environment Protection Authority public register has identified a number of notices for this site and operators within the past 8 months:

- s.91 Clean Up Notice (Notice Number: 1540623) dated 30 May 2016 – in relation to asbestos containing material being identified on site within material that has been sorted and in some instances crushed and screened, in preparation for material recycling and reuse.
- Penalty Notice (Notice Number: 3085780482) dated 12 October 2016 – in relation to the corporation contravening condition O3.3 of the licence for failure to ensure that sediment was tracked from the premises.
 - This penalty notice also lists an official caution that the EPA issued to Enviro Recycling on 28 July 2016 for processing material outside of the building that is located on the premises in non compliance with the Licence.



- s.96 Prevention Notice (Notice Number: 1546062) dated 4 November 2016 – in relation to waste related activities at the premises undertaken by Enviro Recycling being carried out in an environmentally unsatisfactory manner.

Concerns have been raised by neighbouring properties about the potential for asbestos to be present within the depositional dust that is currently an issue on the neighbouring properties.

Past and current performance would suggest that this is a possibility, and we don't believe that this has been adequately assessed or covered within this development application.

In addition, silted water generated from site and street sweeping processes associated with operational dust management has been observed running into Council stormwater drains along the street (see photo plate 8, Attachment A). Concerns have been raised about the potential for contaminants to be entering the stormwater system and adversely affecting the local aquatic ecosystem.

The continuing complaints from neighbours, and the concerns raised by the NSW EPA and the issuing of clean up, penalty and prevention notices would suggest that current operations as having a significant impact on the surrounding environment and the expansion of operations at this site would be inadvisable.

8.0 Conclusion

We consider that in light of the aforementioned issues and concerns, this development should not go ahead as currently proposed. On behalf of Nubent Pty Ltd and Bituminous Products Pty Ltd, and tenants located at 35 Violet Street (Vulkan Advanced Engineering Pty Ltd and Billabong Water Pty Ltd), we object to the development (SSD 15_7349).

Environmental Earth Sciences NSW

On behalf of Nubent Pty Ltd and Bituminous Products Pty Ltd

Project Manager

Nicole Cheung
Senior Environmental Consultant

Project Director / Internal Reviewer

Fraser Elder
Manager - Green Plus Property

Technical Reviewer

Mark Stuckey
Principal Soil Scientist, Hydrogeologist and Risk Assessor



9.0 Limitations

This report has been prepared by Environmental Earth Sciences NSW ACN 109 404 006 in response to and subject to the following limitations:

1. The specific instructions received from Nubent Pty Ltd and Bituminous Products Pty Ltd;
2. The specific scope of works set out in PO116160 issued by instructing company for and on behalf of Nubent Pty Ltd and Bituminous Products Pty Ltd;
3. May not be relied upon by any third party not named in this report for any purpose except with the prior written consent of Environmental Earth Sciences NSW (which consent may or may not be given at the discretion of Environmental Earth Sciences NSW);
4. This report comprises the formal report, documentation sections, tables, figures and appendices etc. and must not be released to any third party or copied in part without all the material included in this report for any reason;
5. The report only relates to the site referred to in the scope of works being located at 37-51 & 57-67 Violet Street, Revesby NSW ("the site");
6. The report relates to the site as at the date of the report as conditions may change thereafter due to natural processes and/or site activities;
7. No warranty or guarantee is made in regard to any other use than as specified in the scope of works and only applies to the depth tested and reported in this report; and
8. Our General Limitations set out at the back of the body of this report.

ENVIRONMENTAL EARTH SCIENCES GENERAL LIMITATIONS

Scope of services

The work presented in this report is Environmental Earth Sciences response to the specific scope of works requested by, planned with and approved by the client. It cannot be relied on by any other third party for any purpose except with our prior written consent. Client may distribute this report to other parties and in doing so warrants that the report is suitable for the purpose it was intended for. However, any party wishing to rely on this report should contact us to determine the suitability of this report for their specific purpose.

Data should not be separated from the report

A report is provided inclusive of all documentation sections, limitations, tables, figures and appendices and should not be provided or copied in part without all supporting documentation for any reason, because misinterpretation may occur.

Subsurface conditions change

Understanding an environmental study will reduce exposure to the risk of the presence of contaminated soil and or groundwater. However, contaminants may be present in areas that were not investigated, or may migrate to other areas. Analysis cannot cover every type of contaminant that could possibly be present. When combined with field observations, field measurements and professional judgement, this approach increases the probability of identifying contaminated soil and or groundwater. Under no circumstances can it be considered that these findings represent the actual condition of the site at all points.

Environmental studies identify actual sub-surface conditions only at those points where samples are taken, when they are taken. Actual conditions between sampling locations differ from those inferred because no professional, no matter how qualified, and no sub-surface exploration program, no matter how comprehensive, can reveal what is hidden below the ground surface. The actual interface between materials may be far more gradual or abrupt than an assessment indicates. Actual conditions in areas not sampled may differ from that predicted. Nothing can be done to prevent the unanticipated. However, steps can be taken to help minimize the impact. For this reason, site owners should retain our services.

Problems with interpretation by others

Advice and interpretation is provided on the basis that subsequent work will be undertaken by Environmental Earth Sciences NSW. This will identify variances, maintain consistency in how data is interpreted, conduct additional tests that may be necessary and recommend solutions to problems encountered on site. Other parties may misinterpret our work and we cannot be responsible for how the information in this report is used. If further data is collected or comes to light we reserve the right to alter their conclusions.

Obtain regulatory approval

The investigation and remediation of contaminated sites is a field in which legislation and interpretation of legislation is changing rapidly. Our interpretation of the investigation findings should not be taken to be that of any other party. When approval from a statutory authority is required for a project, that approval should be directly sought by the client.

Limit of liability

This study has been carried out to a particular scope of works at a specified site and should not be used for any other purpose. This report is provided on the condition that Environmental Earth Sciences NSW disclaims all liability to any person or entity other than the client in respect of anything done or omitted to be done and of the consequence of anything done or omitted to be done by any such person in reliance, whether in whole or in part, on the contents of this report. Furthermore, Environmental Earth Sciences NSW disclaims all liability in respect of anything done or omitted to be done and of the consequence of anything done or omitted to be done by the client, or any such person in reliance, whether in whole or any part of the contents of this report of all matters not stated in the brief outlined in Environmental Earth Sciences NSW's proposal number and according to Environmental Earth Sciences general terms and conditions and special terms and conditions for contaminated sites.

To the maximum extent permitted by law, we exclude all liability of whatever nature, whether in contract, tort or otherwise, for the acts, omissions or default, whether negligent or otherwise for any loss or damage whatsoever that may arise in any way in connection with the supply of services. Under circumstances where liability cannot be excluded, such liability is limited to the value of the purchased service.

ATTACHMENT A – PHOTOGRAPHS



PLATE 1: Depositional Dust outside buildings at 35 Violet Street, Revesby



PLATE 2: Depositional Dust outside buildings at 35 Violet Street, Revesby



PLATE 3: Depositional Dust within work areas at 35 Violet Street, Revesby



PLATE 4: Depositional Dust on stairwell within building at 35 Violet Street, Revesby



PLATE 5: Traffic hazard – Truck stopped in Violet Street blocking one lane and reducing visibility.

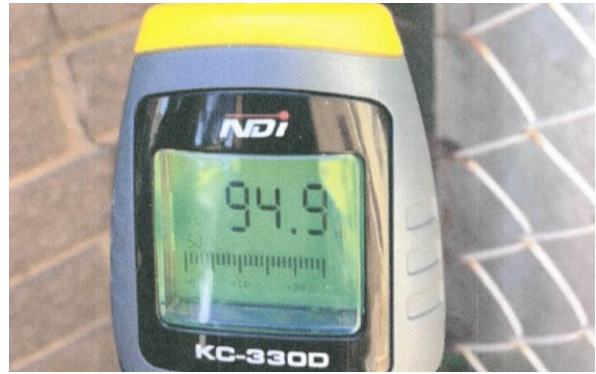


PLATE 6: Independent Noise level reading conducted by Nubent Pty Ltd at 35 Violet Street, Revesby (Maximum level – 11 October 2016)



PLATE 7: Vibration damage to outside building wall at Unit 3, 35 Violet Street. Wall adjacent to Enviro Recycling

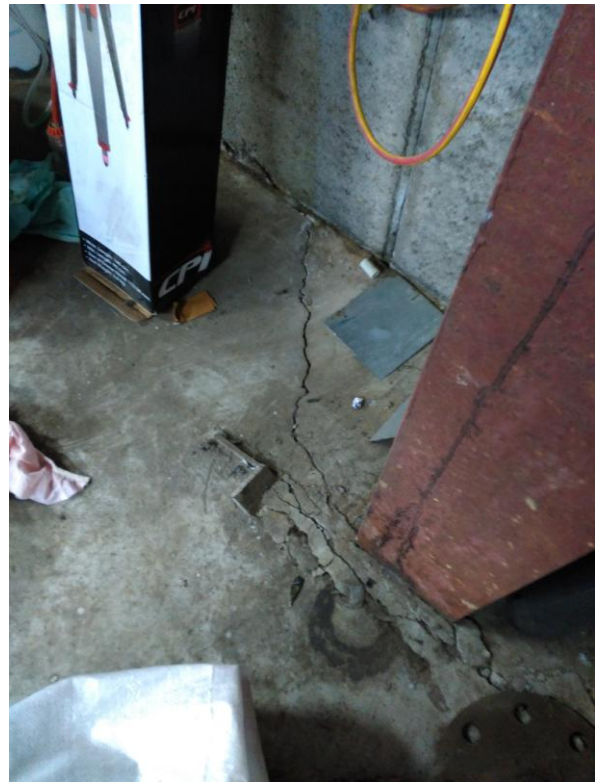


PLATE 8: Vibration damage to structural pylon and internal concrete slab at Unit 3, 35 Violet Street. Wall adjacent to Enviro Recycling



PLATE 9: Sediment laden runoff from Enviro Recycling running down Violet Street and into stormwater drains.



ATTACHMENT B – LETTERS OF CONCERN



BITUMINOUS PRODUCTS PTY LTD

29-35 Violet Street Revesby NSW 2212

TO WHOM IT MAY CONCERN 2nd November 2016

This statement is made in relation to Enviro Recycling 37 – 51 Violet Street Revesby NSW 2212. I have been reluctant to report this to the EPA in the past as we have tried to be tolerant of our neighbours Enviro Recyclers, however despite meetings and promises to improve, Enviro Recycling are getting worse and have no regard for the surrounding community.

Our complaints relate to:

- Noise
 - Dust
 - Vibration
 - Traffic congestion in the street
 - Street sweeper constantly blocking the road.
 - Dirt, dust and mud in the street tracked by vehicles
-
1. The surrounding factories including us are often inundated with dust fallout that covers our yards, machinery and vehicles and infiltrates the laboratory and offices.
 2. We have had the dust analysed for crystalline silica and asbestos in May 2016 as a duty of care to our employees and it came back negative for both but we are concerned that this may not be the case on all occasions.
 3. On 13th October 2016, wood fibres covered 35, 33 and 29 Violet Street. Apart from the respiration hazard and general nuisance value we now have a potential fire fuel all over any horizontal surface including roofs and guttering.
 4. Violet Street is often covered in mud as Enviro Recycling use a street sweeper with water spray to attempt to clean up the dust fallout and dirt tracked into the street by the trucks.
 5. They sometimes use a water tanker to wash the street which simply moves the dirt into the stormwater system and canal.
 6. Violet Street is often blocked by tippers queuing to get into the site from both directions which delays all other delivery vehicles and cause a safety hazard.
 7. 35 Violet Street (next door to Enviro) is worst affected with vibrations and resonance from screens and heavy equipment and perpetual inundation in invasive abrasive dust.

We try to be tolerant of our neighbours however the activities of Enviro Recycling are having a real impact on our business and is a cause of concern to us and our employees.

Neil Morcombe
Managing Director

24th August 2016

Attention The Licencing Officer

EPA

P.O. Box A290

Sydney South NSW 1232

Dear Sir or Madam,

Subject:

Unacceptable Noise Vibration Levels and Air Pollution Levels from Enviro Recycling in Violet Street
Revesby EPA Reference C11080/2016.

Dear Sir,

Further to our letters of the 25th May 2016 and 29th June 2016 and 12th July 2016 and 1st August 2016 and 9th August 2016 we are still receiving many hours of noise in excess of 70 dB and sometimes in excess of 90 dB, see picture at 91.7db on the 9th August, at times with a constant ground vibration that would show a Richter scale measurement. Another picture is provided of sawdust fallout to out yard, this covers everything throughout our factory. Some days it is impossible to work under these conditions.

AS I write this letter the whole building is vibrating and making it impossible to work!

Today is the 24th August and we are covered in sawdust and cannot go outside our building as our eyes sting to an extent it is unbearable for any length of time. The db at my desk I have just taken and it is in excess of 93 db!, however much worse than the loudness is the physical pulsating pressurewaves which make work impossible.

It appears that the concrete floor slabs in the Enviro yard are poured in direct contact with our floor slabs and footings. This obviously allows a direct transmission of vibration and sometimes violent percussions through our building.

Enviro is far worse than a conventional tip. The excessive noise, percussive vibration and air pollution have made life hell!

Can the EPA please help our plight?

Yours faithfully,

John Bradley 0418 974 332

Nubent Pty Ltd

Owners of 35 Violet Street

Revesby NSW 2212

9th August 2016

Attention The Licencing Officer

EPA

P.O. Box A290

Sydney South NSW 1232

Dear Sir or Madam,

Subject:

Unacceptable Noise Vibration Levels and Air Pollution Levels from Enviro Recycling in Violet Street
Revesby

Dear Sir,

Further to our letters of the 25th May 2016 and 29th June 2016 and 12th July 2016 and 1st August 2016 we are still receiving many hours of noise in excess of 70 dB and sometimes in excess of 90 dB, see picture at 91.7db on the 9th August, at times with a constant ground vibration that would show a Richter scale measurement. Another picture is provided of sawdust fallout to out yard, this covers everything throughout our factory. Some days it is impossible to work under these conditions.

It appears that the concrete floor slabs in the Enviro yard are poured in direct contact with our floor slabs and footings. This obviously allows a direct transmission of vibration and sometimes violent percussions through our building.

Enviro is far worse than a conventional tip. The excessive noise, percussive vibration and air pollution have made life hell!

Can the EPA please help our plight?

Yours faithfully,

John Bradley 0418 974 332

Nubent Pty Ltd

Owners of 35 Violet Street

Revesby NSW 2212

12th July 2016

Attention The Licencing Officer

EPA

P.O. Box A290

Sydney South NSW 1232

Dear Sir or Madam,

Subject:

Unacceptable Noise Vibration Levels and Air Pollution Levels from Enviro Recycling in Violet Street
Revesby

Dear Sir,

Further to our letters of the 25th May 2016 and 29th June 2016, we are still receiving many hours of noise in excess of 70 dB and sometimes in excess of 90 dB, at times with a constant ground vibration that would show a Richter scale measurement. Some days it is impossible to work under these conditions.

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Can the EPA please help our plight?

Yours faithfully,

John Bradley 0418 974 332

Nubent Pty Ltd

Owners of 35 Violet Street

Revesby NSW 2212

1st August 2016

Attention The Licencing Officer

EPA

P.O. Box A290

Sydney South NSW 1232

Dear Sir or Madam,

Subject:

Unacceptable Noise Vibration Levels and Air Pollution Levels from Enviro Recycling in Violet Street
Revesby

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Can the EPA please help our plight?

Yours faithfully,

John Bradley 0418 974 332

Nubent Pty Ltd

Owners of 35 Violet Street

Revesby NSW 2212

12th July 2016

Attention Mr Ranmal Mendis

Senior Building Surveyor

Bankstown City Council

P.O.Box 8, Bankstown NSW 1885

Unacceptable Noise Vibration Levels and Air Pollution Levels from Enviro Recycling in Violet Street
Revesby

Dear Sir,

Further to our letter of the 28th April we are still receiving many hours of noise in excess of 70 dB and sometimes in excess of 90 dB, at times with a constant ground vibration that would show a Richter scale measurement. Some days it is impossible to work under these conditions.

Enviro is far worse than a conventional tip. The excessive noise, vibration and air pollution have made life hell!

Can Council please help our plight.

Yours faithfully,

John Bradley 0418 974 332

Nubent Pty Ltd

Owners of 35 Violet Street

Revesby NSW 2212

29th June 2016

Attention: The Licencing Officer

EPA

P.O. Box A290 Sydney South NSW 1232

Dear Sir,

It is approximately 7 months now since we approached our adjacent neighbour Mr Bruce Fordham, managing Director of Enviro Recycling P/L situated at 37-51 Violet Street, Revesby. The issues were SILICA DUST from cement and brick crushing and noise well in excess of 70db.

Our approach was to complain about the large volumes of very fine sawdust and fine silica laden dust that regularly descend on our property. This can be much as 3mm over a few hours particularly noticeable on car windscreens and concreated areas. Since that time a shade cloth screen has been erected but the volume of dust has only marginally decreased. Air is also polluted when Enviro process timber which releases phenol smelling vapours which affect the eyes. Dust masks are required at these times.

The Resident employees on our site are extremely upset and angry at these pollution extremes. A common retort is "we are living in hell!" This continual silica dust problem still awaits a solution.

NOISE.

Noise levels at the boundary are always in excess of 70db when the heavy plant is near our boundary Walls (usually 70-95 dB on our handheld meter).

However the dB is almost bearable compared to the resonance created at our wall by large throttle openings of their diesel motors when close to our walls which are unprotected on the Enviro side. The compression waves on our wall (they do not have a retaining wall) create a standing resonance or harmonic inside our building which can make occupation unbearable.

Enviro are using our factory and office walls as their own waste retaining walls, their heavy machinery excavators often contact our walls resulting in very heavy impacts.

Our walls are cracked from floor to ceiling due to extremely large equipment impacts that have occurred on many occasions. Structural cracks in our concrete floor are evident at the base of our wall support columns.

It appears that the only lasting solution to the noise and recycling waste problem is a high wall at least the height of our own walls to be constructed between our properties to stop the noise penetration and damage to our property. It is noted that Council only require a 3 metre wall height which obviously will not stop the problem.

Yours faithfully,

John Bradley.

Nubent Pty Ltd

Factory 3, 35 Violet Street, Revesby NSW 2212 0418 974 332 or 9771 4642

25th May 2016

Attention: The Licencing Officer

EPA

P.O. Box A290

Sydney South NSW 1232

Dear Sir,

It is approximately 6 months now since we approached our adjacent neighbour Mr Bruce Fordham, managing Director of Enviro Recycling P/L situated at 37-51 Violet Street, Revesby. The issues were SILICA DUST from cement and brick crushing and noise in excess of 70db.

Our approach was to complain about the large volumes of sawdust and silica laden dust that regularly descend on our property. This can be much as 3mm over a few hours particularly noticeable on car windscreens and concreated areas. Since that time a shade cloth screen has been erected but the volume of dust has only marginally decreased. Air is also polluted when Enviro process timber which releases phenol smelling vapours which affect the eyes. Dust masks are required at these times.

The Resident employees are extremely upset and angry at these pollution extremes. A common retort is "we are living in hell!" This continual silica dust problem still awaits a solution.

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Our walls are cracked from floor to ceiling due to extremely large equipment impacts that have occurred on many occasions. Structural cracks are evident at the base of our wall support columns.

It appears that the only lasting solution to the noise problem is a high wall at least the height of our own walls to be constructed between our properties to stop the noise penetration. It is noted that Council only require a 3 metre wall height which obviously will not stop the problem.

Yours faithfully,

John Bradley.

Nubent Pty Ltd

Factory 3, 35 Violet Street, Revesby NSW 2212 0418 974 332 or 9771 4642

28th April 2016

Attention: Mr Ranmal Mendis

ranmal.mendis@bankstown.nsw.gov.au

Senior Building Surveyor

Bankstown City Council

P.O. Box 8, Bankstown NSW 1885.

council@bankstown.nsw.gov.au

Dear Sir,

Many thanks for attending our factories at 35 Violet Street, Revesby on 28th April 2016.

It is approximately 6 months now since we approached our adjacent neighbour Mr Bruce Fordham, managing Director of Enviro Recycling P/L situated at 37-51 Violet Street, Revesby. The issues were SILICA DUST from cement and brick crushing.

Our approach was to complain about the large volumes of silica laden dust that regularly descend on our property. This can be much as 3mm over a few hours particularly noticeable on car windscreens. Since that time a shade cloth screen has been erected but the volume of dust has not decreased. Air is also polluted when Enviro process timber which releases phenol smelling vapours which affect the eyes. Dust masks are required at these times.

Resident employees are extremely upset and angry at these pollution extremes. A common retort is "we are living in hell!" This continual silica dust problem still awaits a solution.

NOISE.

Noise levels at the boundary are always in excess of 70db when the heavy plant is near our boundary Walls (usually 70-90 dB on our handheld meter).

However the dB is almost bearable compared to the resonance created at our wall by large throttle openings of their diesel motors when close to our walls which are unprotected on the Enviro side. The compression waves on our wall create a standing resonance or harmonic inside our building which can make occupation unbearable.

Our walls are cracked from floor to ceiling due to extremely large equipment impacts that have occurred on many occasions.

It appears that the only lasting solution to the noise problem is a high wall at least the height of our own walls to be constructed between our properties to stop the noise penetration. It is noted that Council only require a 3 metre wall height which obviously will not stop the problem.

Yours faithfully,

John Bradley.

Nubent Pty Ltd

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