



PCU012095

PROPOSED DEVELOPMENT – ST PETERS MATERIALS RECYCLING FACILITY PROJECT (MP_0086)

IMPACTS ON HUMNA HEALTH:

There has been no genuine attempt by this Proposal to assess the impacts of the proposed activity on human health. There must also be a full assessment on the risks of such an activity on human health. The crushing of sandstone is a hazardous activity.

The Proponent is proposing to conduct the crushing and processing activities outdoors.

The potential impacts on human health have not been comprehensively addressed in the Proponent's EA.

Detailed Modelling should be undertaken to determine expected inhalable dust, and respirable dust and quartz concentrations during normal separation/recycling activities and to make recommendations and proposals as required.

Modelling should also take into account all relevant and known wind directions and wind roses.

Respirable crystalline silica dust is responsible for respiratory illness and workers (working at this subject site) or exposed to the silica dust at the ALF site are exposed to this hazard as well as local residents who are opposite to the site. Exposure to silica dust causes many problems including silicosis.

The Air Quality Assessment blandly assumes that since the adjacent property is currently also a Recycling and Waste Transfer Centre that it is therefore just acceptable to load those employees with additional airborne particulate loadings.

Airborne Particulates generated by this Proposal will significantly devalue its redevelopment potential and degrade its retail commercial value.

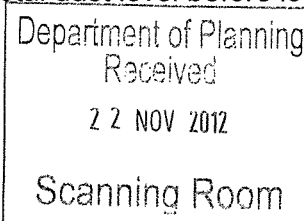
Given the proximity to existing industrial activities and local residents this proposal should not be granted Project Approval.

NUISANCE IMPACTS OF EMISSIONS:

The preceding sections are concerned in large part with the health impacts of particulate matter. Nuisance impacts need also to be considered, mainly in relation to dust.

In NSW, it is accepted practice that dust becomes a nuisance in relation to its impact on residential areas when annual average dust deposition levels exceed 4 g/m²/month (inclusive of background dust levels).

The NSW EPA impact assessment goals for dust fallout, showing the allowable increase in dust deposition level over the ambient (background) level which would be acceptable so that dust nuisance could be avoided and the maximum allowable total dust level before loss of amenity is experienced is show here.



EPA Goals for Allowable Dust Deposition

Averaging Period Maximum Increase in Deposited Dust Level Maximum Total Deposited Dust Level

Annual 2 g/m²/month 4 g/m²/month

Source: AMMAAP, DEC 2005.

By misleadingly presenting only the estimates for contribution by this Project and ignoring existing air quality and surrounding projects the report pretends that the EPA Goal for allowable dust deposition will not be exceeded.

The rear gardens of those homes are only a 4 metre lane width away from the Project area.

DEFECTIVE DISPERSION MODELLING METHODOLOGY:

The atmospheric dispersion modelling carried out for the Project utilises the Ausplume Gaussian Plume Dispersion Model software developed by EPA Victoria, Version 6.0. Ausplume is the approved dispersion model for use in the majority of applications in NSW.

Default options specified in the Technical Users Manual (EPA Victoria, 2000) have been used, as per "*Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in New South Wales*", DEC 2005.

It does not however account for the Topography of sites being modelled.

Local topography plays an important role in atmospheric dispersion of pollutants by allowing or obstructing free movement of air masses.

Given that processing is to take place atop a hill the topography of the area surrounding the project site being characterised by relatively flat terrain and is therefore unlikely to impede the dispersion of atmospheric pollutants. The dispersal area is likely to be large in periods of strong winds.

Strong southerly winds coincide with hot dry summer months and accordingly a terrain file should be incorporated into the dispersion model used for this assessment.

This site does not have the benefit of any natural wind break against wind erosion for exposed surfaces and stockpiles on site and no natural barriers to inhibit the spread of larger dust particles which will tend to settle out quickly and not get transported significant distances by wind.

The adjacent site has been able to exploit the topography of its site, its quarry pit, and its berms and surrounding walls to mitigate its dust generating effects.

The proposed site has no such benefits and crushing and grinding works carried out atop a hill 15 metres above surrounding ground levels will (having regard to wind speed and direction) have an effect on surrounds far exceeding the 8 residential receivers whose gardens are a bare 5 metres away.

EXISTING AIR QUALITY ENVIRONMENT:

The existing air quality in the vicinity of Alexandria Landfill is associated with that of an industrial environment. A number of open-air recycling operations in proximity to each

other ALREADY results in an elevated level of airborne particulates compared with other light and non-industrial areas.

The Randwick site is located in the grounds of the Randwick Army Barracks, on the corner of Avoca and Bundock Streets, approximately 5.6 km east of Alexandria Landfill. The Earlwood site is located within Beaman Park, Riverview Road, Earlwood, approximately 5.5 km west of Alexandria Landfill.

Both monitoring stations are sited in residential areas within the DEC's East Sydney region. Data from these sites has been inappropriately used as a comparison basis for establishing baseline modelling. This is a cheap and inadequate substitute for actual air quality monitoring which should be carried out to establish actual local baseline results.

DUST MANAGEMENT:

The details of dust management measures are wholly inadequate

- Dust spray systems must be installed and operating to minimise dust from all stockpiles and processing areas at the facility.
- Dust sprays and/or dust collection systems must be installed and operating on all crushing, grinding and screening equipment at the facility.
- The Proponent must ensure that all stockpiles are wetted prior to material being removed from them for processing and that during processing, they are kept wet and high-pressure water sprays are utilised to prevent the migration of dust.
- The vehicle routes in use around the premises, except for concrete handstands, are to be kept damp from 700hrs to 1700hrs Monday to Fridays and 700hrs to 1600hrs Saturdays.

All vehicles leaving the premises must be first put through an operating wheel wash

- Continual operation - modeling to take account of water throughput
- Establishment of trigger values when various mitigation and management steps are to be taken and when activities should cease.

No assessment has been shown of the mitigation effects of these where and when they may be utilised or the effect that they have had on the modelling.

No proper assessment can be made therefore as to their accuracy.

ENCLOSURE OF PROPOSED ACTIVITIES:

The EPA's stated position is that general non putrescible waste transfer on the adjacent site (and at ground level not 15 metres in the air) should take place under the cover of a fully enclosed building.

Non putrescible waste transfer involves the loading and unloading of trucks only:

It does not involve the crushing grinding and screening of hardfill materials (such as sandstone).

If the EPA's position is that mere loading and unloading of trucks should take place undercover at ground level it can hardly be the EPA's position that crushing grinding and screening can appropriately be carried out in the open air 15 metres above ground level.

Given the proximity to both residential premises as a minimum, best practice and minimal impact to the environment would dictate that processing of sandstone by crushing or grinding should take place within an enclosed building

The height of the existing sandstone stockpile is 10-15metres above road level of Campbell Rd or Albert Street. This means that crushed sandstone particles will become windborne more readily than similar material from the neighbouring property. This places both residences of Campbell Rd, Albert St, Barwon park Road and uses of Sydney Park at greater risk.

Minimising the exposure of the operations of this proposal to ALF and the adjoining residents in Albert Street and Campbell Road is critical given the close interaction between industrial zones and residential zones.

The adjoining neighbours of the Proponent (including a number of residents to the north in Albert and Campbell Road) will also be greatly affected by both the noise and dust generation of proposed crushing and processing activities.

The Proponent has failed to design the site and the proposed built form, (being largely earth-works), having regard to the operational constraints and the surrounding environment.

In our view, there should be a complete re-design of the proposed development to construct a large building to house these proposed activities.

NOISE:

The operation of crushing, grinding and screening plant, front end loaders and trucks loading and unloading are all known to be noisy activities.

Similar noisy activities currently take place within the ALF site but that site is protected by high concrete walls and berms (of which the Project site is one)

The Project site has no such protection and the machinery and plant noise will affect all local residences.

Proposed F6/St Peters Industrial Route:

The subject site is owned by the NSW Roads & Maritime Services (**RMS**) and the site is leased to the Proponent.

The RMS have a road reservation over the site, for the F6 Corridor, which is substantially mirrored in the local government zoning.

At present this road reservation is extensive and imprecise. However, the road reservation depicted in the Draft Sydney LEP 2011 appears to consolidate the position of the road.

Given the status of this designation on title, we are of the view that the Proponent should not be pursuing a major re-development in circumstances where the

EXCESSIVE HOURS OF OPERATION:

The EA outlines that the proposed hours of operation will be:

Loading of trucks	Monday to Friday	6:00am to 6:00pm
	Saturday	7:00am to 4:00pm
Truck movements	Monday to Friday	6:00am to 6:00pm
	Saturday	7:00am to 4:00pm
Use of crusher/screens	Monday to Friday	7:00am to 6:00pm
	Saturday	7:00am to 4:00pm

These proposed hours of operation are excessive.

The Office of Environment & Heritage recommended that the standard construction hours that are applicable during construction are:

Monday to Friday	7:00am to 6:00pm
Saturday	8:00am to 1:00pm

We are of the view that these hours should also be adopted, if the proposal is approved, to minimise impacts on the surrounding neighbourhood. The loading and movement of large trucks from 6:00am is a public risk and the use of crushers from 7:00pm every morning (excluding Sunday) is a major noise impact to adjoin neighbours and residents in the area.

STORMWATER IMPACTS:

We understand from the 'combined' Traffic and Stormwater Drainage Report prepared by Lyle Marshall & Associates Pty Ltd (September 2012) that with respect to the proposed stormwater drainage system (during the site preparation and excavation stages) that run-off from the site catchment area of 5170 m² will drain to retention basins 1 and 2 which have a combined capacity of 743 m³.^[2]

In our view, we do not believe that it adequate, as the stormwater design should be prepared to handle a one in one hundred year flooding event, as this site area is significant.

There are also inadequate details of what management measures will occur if the detention basins overflow – where will they be discharged to? We also suggest that there should be a perimeter catch drain constructed around the site to divert run off from the subject site away from the adjoining ALF site.

It appears that diesel pumps will also be operated manually between the hours of 6:00am to 6:00pm as required to discharge stormwater from the site to Holland Street. The operation

^[2] Page 20 of the Traffic and Stormwater Drainage Report dated September 2012.

of diesel pumps will also add to the noise load – normally stormwater should be gravity drained.

We also note that stormwater drains in Holland Street are notorious for blockages, as this has been the case for the last decade.

OUTDATED TRAFFIC DATA:

The traffic volume and classification counts relied upon by the Proponent in the EA (Traffic and Stormwater Drainage Report prepared by Lyle Marshall & Associates Pty Ltd) is inadequate.

The report discloses that the traffic counts were carried out over 7 days in December 2009 ^[3] showed:

*“that the peak hours were 7:00-8:00am and 5:00-6:00pm. Traffic volumes were highest in the am peak hour. The two-way traffic of **1047** vphr included **114** heavy vehicles”.*

This traffic data is close to **3 years old** and should not be relied upon for the purposes of making any informed and meaningful assessment by the DOPI's assessment officers. The traffic count and data should be re-done by the Proponent.

Further to this, we point out that the:

“count was a made of all turning movements from 7:00am to 9:00am to Albert Street / Campbell Road intersection in March 2011. For a two-way total of 1059 pcu's / hr in Campbell Road the practical capacity for the right turn from Albert Street is 104 pcu's / hr. The existing volume is 41 pcu's/hr”.

Once again this traffic count is **over 12 months old** and should not be relied upon for the purposes of assessment by the DOPI.

EROSION IMPACTS:

There has been an inadequate assessment of potential erosion impacts in the EA.

The EA states that should the western face of the existing stockpile start to erode then, (upon inspections), the surface may be “*stabilised with spray grass or a light grade woven polypropylene fabric pinned to the surface*”. ¹

Stating that an inspection would take place after a heavy rain event, is not in our view, an adequate response given the enormous stockpile and implications for major slippage should the western face become de-stable.

Comprehensive measures to ensure than adequate erosion control take place should be carefully dealt with in the Proponent's EA.

CUMULATIVE ENVIRONMENTAL IMPACTS:

^[3] Page 26 of the Traffic and Stormwater Drainage Report dated September 2012.

¹ Environmental Assessment prepared by Nexus Environmental Planning Pty Ltd, page 4-20.

There has been no comprehensive consideration of the cumulative environmental impacts having regard to the existing operations underway at ALF.

The potential impacts (dust, traffic and noise) that the Proponent's development will have, as a cumulative impact, will be significant.

We believe that a comprehensive assessment of the proposed impacts having regard to the impacts on the nearby residents is needed.

NEW SOUTH WALES

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