



24 September 2020

Director Industry Assessments, Planning and Assessment,
Department of Planning, Industry and Environment,
Locked Bag 5022
PARRAMATTA NSW 2124

Submitted online: www.planningportal.nsw.gov.au/major-projects

Dear Sir

Re: Kariong Sand and Soil Supplies Facility (SSD 8660)

Central Coast Public Health Unit (CCPHU) offers the following comments on the Response to Submissions (RTS) report and revised environmental impact assessment for the above project.

1 Air Quality

We note Section 1.2.2 of the Air Quality Impact Assessment (AQIA) which acknowledges our previous comments and provides the proponent's responses.

We are aware that the EPA noted inadequacies in the initial air quality impact assessment and now seek confirmation that the revised AQIA, mitigation measures and Air Quality Management and Monitoring Plan are to satisfaction of the EPA.

The AQIA states that no project related exceedance of the 24 hour average PM10 and PM2.5 impact assessment criterion will occur (p 87). However we note:

- the EIS (Tables 9.14, 9.15 and 9.16) indicates that particulate matter attributable to the project will contribute up to 26% of the PM10 24 hour criterion and up to 12% of the PM2.5 24 hour criterion at the most affected receptors. Table 9.14 indicates that the impact expected at location I6 (Kariong Correctional Facility) is almost as high.
- The AQIA indicates that, measured at the nearest sensitive receptor, respirable crystalline silica will be increased up to 10% of relevant criteria by the project but this is considered insignificant (section 1.2.3).
- Construction phase activities have potential to generate 'short term emissions of particulates', which 'may typically be experienced by neighbours as amenity impacts rather than health related impacts'.

While the anticipated increases may fall under the relevant assessment criteria, we suggest that they could present an increased risk to the health of the community. We reiterate our previous advice that *'Epidemiological studies have been unable to identify a threshold below which exposure to particulate matter air pollution (PM) is not associated with health effects. Therefore, any increase in exposure must be assumed to have an adverse impact, even at levels below the assessment criteria'*.

The expected impact at the Riding for Disabled facility is not obvious in the EIS (Table 9.17) and we request that the assessment clearly identify the potential impact at this location.

The use of mist sprays for dust suppression is relied on throughout the site. We seek confirmation that ceiling mounted spray misters will be effective in managing air quality impacts, especially in relation to the 11m high open face to the tip and spread building (AQIA Fig 3).

The complete closure of doors and openings on the processing building is a dust control measure and the AQIA (p66) notes doors will be closed 'whenever possible', reflecting the realistic situation that openings cannot be closed at all times. We suggest that if necessary to ensure that air quality goals are met, processing operations should cease while doors and other openings are open.

To remove potential subjectivity, formal processes should be developed to guide the ceasing of work on 'windy days' and the visual assessment of, and response to dust lift off during material handling. These processes should be included in the Air Quality Management and Monitoring Plan, or otherwise documented.

The AQIA identifies the need for implementation of mitigation measures to ensure that the risks to the community from construction phase air quality impacts remain low or not significant. The proposed mitigation measures and Construction Environmental Management Plan must be to the satisfaction of the EPA and or Central Coast Council as applicable.

The EIS (Table 9.11 item 7.1) recommends the avoidance of bonfires and burning of waste materials as mitigation measures. We suggest that these activities should be expressly prohibited.

As in our previous submission, we believe that the project should not create any deterioration of air quality beyond the property boundaries, or present a risk to people on the site, whether during construction, during operations, from associated vehicles or as a contributor to cumulative impacts. If approved, conditions should be applied to ensure air quality is not adversely impacted by the project.

2 Noise

We note the RTS report (pp 129-131) and the Noise and Vibration Impact Assessment (NVIA) which provide the proponent's responses to our comments on the previous assessment.

We seek confirmation that the NVIA, mitigation measures, Construction Noise and Vibration Management Plan are to the satisfaction of the EPA and Central Coast Council, as applicable.

The NVIA predicts that noise emissions to the surrounding environment are low and that the Project Noise Trigger Levels are satisfied, provided various mitigation measures are employed (NVIA p2). Should the project proceed, we ask that appropriate approval conditions are applied to ensure there is no adverse impact on the community and people on the site, during both construction and operational stages.

The NVIA (section 5.3) suggests that facades and openings will be closed during 'processing activities' and that processing activities will not occur during vehicle movements when doors are open. Various façade construction methods are proposed to provide the required minimum airborne sound insulation performance. We defer to the EPA but suggest that these undertakings should be formalised as conditions of approval if the project proceeds.

The traffic noise assessment notes an 88% increase in heavy vehicles on Gindurra Road from the project (NVIA Table 17), resulting in an increase of only 0.6dB. We request confirmation that this is an accurate assessment.

During construction, exceedances of the Noise Management Levels of up to 12dB are predicted at the nearest residential receivers (NVIA section 9.1). In addition to the proposed mitigation measures, if the project proceeds, we ask that the recommendations in section 9.1.2 of the NVIA be considered as possible conditions of approval, that is construction of noise barriers (walls) and monitoring of construction noise levels, and if required, respite periods and alternate construction methods.

We reiterate our previous suggestion that the proponent should consult with the local community and commit to a construction schedule that will create the least possible disruption.

3 Cumulative Impacts

A cautious approach should be adopted to assessment of cumulative impacts. The AQIA states (p50) that no assessment of cumulative impact has been conducted, and we seek confirmation that this is reasonable, given that SEARS have been issued for similar projects at 75 Piles Rd Somersby, 83 Gindurra Rd Somersby and that Gosford Quarries operates 250m to the east of the project site. We believe there is an imperative to ensure that the health and amenity of the local area is not negatively affected by the cumulative impact of individual projects, especially when the timing of projects means the risk of cumulative impact may be less obvious.

4 Water Supply

We note the commitment to connect the premises to Council's sewerage system and the intent to collect and reuse rainwater and stormwater.

The dual supply of recycled and potable water must be in accordance with the relevant plumbing and drainage standards. There must be no risk to Central Coast Council's potable water supply, for example backflow of recycled water into the potable supply within or beyond the property boundary.

We seek confirmation that the volume of water collected on site will be sufficient for the emission reduction methods listed in the EIS (Table 9.4). If not, a backup water supply will be required and details of this should be provided (noting potable water use in the secondary sorting shed).

5 Worker and Visitor/Contractor Health

If the project proceeds, we request that the following concerns be addressed:

- The proponent must ensure the health and safety of all workers and visitors, for example potential exposure to: recycled water through dust suppression misters, noisy work environments, *legionella* bacteria in water misting systems (including potable water supplies), and non compliant hazardous materials such as asbestos.
- The water misting and water treatment systems must be designed, maintained and operated to manage the risks they present to human health.
- Caution should be exercised in sweeping hard surfaces and roadways, to avoid risk to worker health and further dust generation.
- Air quality within the buildings must ensure workers are not exposed to unacceptable levels of particulate matter. The EIS suggests local exhaust ventilation systems as a recommended mitigation measure (Table 9.11, item 6.1). If mechanical ventilation is utilised, exhaust

discharges must be located and treated so as to avoid negative impacts within and beyond the property boundaries.

- The non friable asbestos cement observed during the initial site investigation must be managed to avoid risks to human health. Management strategies must be to the satisfaction of the appropriate regulator.
- While we commend strategies to reduce reliance on potable water for dust suppression, the human health risks associated with recycled water must be assessed and managed to ensure that water quality is fit for the end use. The Water Quality Impact Assessment (WQIA) makes claims in relation to human health but does not provide an adequate human health risk assessment or details to substantiate the claims made. A thorough human health risk assessment is required, and must include the risk of exposure to pathogens including *legionella* bacteria, and contaminants such as hydrocarbons and other chemicals.
- The stormwater treatment plant performance claims in the WQIA, including Table 5, section 7.13.1 and section 8 require verification and validation to the satisfaction of the appropriate regulator.
- All water outlets connected to a recycled water supply must be clearly labelled as not suitable for drinking.
- All approvals relevant to the recycled water scheme, including the treatment systems, must be obtained prior to commencement of recycled water use.
- The WQIA refers to firefighting foams and the risk of PFAS (p37). This risk must be managed and we ask that appropriate conditions of approval be applied.
- Closure of building opening is a dust and noise mitigation measure. It is essential that workers are not exposed to unacceptable noise levels.

6 Monitoring and Enforcement

If the project is approved, management strategies should be consistent with best practice, clearly quantifiable, measurable, auditable and enforceable. Methods for determining compliance must be to the satisfaction of the appropriate regulator.

Comprehensive monitoring of noise emissions and air quality would be required to ensure that the project goals are met, and that the health and amenity of the community are not negatively affected. We would support the commitment to provide continuous monitoring equipment including high volume air samplers, dust gauges and sound meters (RTS Report Table 6.1, NVIA s9.1.2), baseline particulate concentration measurements (AQIA p22), and regular reporting of results to the community.

Monitoring locations should be representative of all sensitive receptors, and able to remain in situ long term so that longer term air quality impacts can be assessed, for example against annual average criteria. Monitoring results should be readily available, for example on a publicly accessible website

We would also support incremental increases in production based on air quality and noise monitoring results if deemed appropriate.

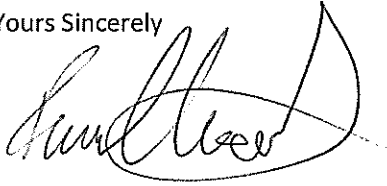
7 Community Feedback

The community must have a contact point for complaints if noise or air quality issues occur, and the proponent must guarantee a prompt and genuine response to all complaints. A 'complaints management protocol' should be developed and implemented in consultation with the community so that the community can be confident that any concerns will be effectively addressed.

Research indicates that air quality and noise impacts may produce negative health effects even at exposures below guidelines. Additionally, significant health outcomes can arise if guidelines are not met. Accordingly, should the project proceed, we encourage appropriate controls, including enforcement, to ensure that adverse impacts are avoided.

Thank you for the opportunity to comment on this project. Please contact Paul Cook or Daniel Newton at the Public Health Unit on 43209730 if further information is required.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Paul Cook', written in a cursive style.

Paul Cook
Acting Director, Public Health

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