

Say No to Plasrefine

**#NOT THE RIGHT SITE
#MOSS VALE MATTERS**

**Response to
Wingecarribee Shire Council's
Response to
GHD's Response to Submissions.**



Moss Vale Matters community group requests that Wingecarribee Shire Council makes an amendment to its draft Submission in relation to the Moss Vale Plastics Recycling Facility, as follows:

- 1. Council oppose the proposed development in its current location.**

Unequivocal opposition to this site's suitability for a Plastic Recycling Facility is essential for Council's position to be consistent with the following:

State MPs
statements:
"Not the right
site"

The firm opposition from both State Members of Parliament that it is NOT the right site:

The Honourable Member for Goulburn, Wendy Tuckerman MP, who has spoken against the proposal as recently as the 17th October 2023; and

The Honourable Member for Wollondilly, Judy Hannan MP.

Overwhelming
community
opposition:
"Not the right site"

665 submissions in total

647 Object

11 in support, and of those only
4 are local.

This proposal has no social
licence.

Wingecarribee LEP IN1 zone needs “To minimise any adverse effect of industry on other land uses”

There are irreconcilable inconsistencies relating to land use planning in the Wingecarribee LEP for Zone General Industrial.

A significant buffer between the residential area and heavy industry in the form of an 8 acre/ 12 football fields Plastics Recycling Factory (PRF) that deals with hazardous processes is **not achievable** in this site.

This proposal is only 30 metres away from Bioresources Australia, and 150 metres from a residential area.



Compare & Contrast

For comparison, approval for a **Naxos PET recycling facility in Albury on 18 December 2020** stated in the reasons for determination: that there was “*significant separation from residential receivers or sensitive land uses*”:

that being “*approximately 1.7- 1.9 kilometres to the north over existing undulating terrain*” for a facility **less than half the size and scope of Plasrefine.**

Reference: Portal reference number (PAN-41794).

Impossible to manage fire risk at this site

There is **no significant separation** from residential receivers or sensitive land uses.

In the submission from Brendan Hurley, NSW Fire & Rescue, to the Secretary's Environmental Assessment Requirements (SEARs), it states GHD has provided insufficient information as to how this will be managed.



Fire safety guideline

Fire safety in waste facilities

5 Background

Historically, fire brigades have attended numerous fires at waste facilities in NSW. These fires are often quite large and have a detrimental impact on firefighting intervention, the environment, local community and the waste industry itself. The potential fire size correlates with the nature of the combustible waste material being processed, stockpile arrangements, on-site fire safety systems and emergency procedures specific to each facility.

Examples of a waste facility include:

- recycling centres
- resource recovery
- materials recovery facility
- energy recovery centre, and
- transfer stations.

Processes undertaken at waste facilities have higher risks than for other industries and can result in greater frequency and severity of fires. A fire involving bulk storage of mixed, loose combustible waste material presents a high and volatile fire load and causes significant challenges for firefighting intervention.

Waste fires in NSW have demanded significant fire brigade resources and intervention over multiple days to extinguish the fire. The largest and longest-lasting fires often involve large stockpiles of unsorted waste with inadequate separation, where physical removal, separation and extinguishment is required. These fires also result in major pollution impact on the community, especially from smoke, which is unable to be contained.

Combustible waste therefore generally presents 'special problems of firefighting' that warrant classification and consideration of 'special hazards' provisions under Clause E1.10 and E2.3 of the *NCC*. Fires in waste facilities present specific issues for firefighting, including:

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- Document attached for reference in the NSW Fire & Rescue response to SEARs:
 - https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_fire_safety_in_waste_facilities.pdf

Fires at Plastics Sorting and Reprocessing Facilities in AUSTRALIA since 2019

Remondis Waste facility - October 23, 2023, 40m x 70m area of recycling waste caught fire taking 4 hours and 60 fire fighters to bring under control.

Benedict Recycling Belrose 30/6/22 Major fire at waste recycling facility fuelled by plastic waste

Cleanaway Artarmon Resource Recovery Centre - December 5, 2022 Major fire at waste management facility fuelled by plastic waste

Cleanaway Bohle Solid Waste Services - October 28, 2021 Major fire at waste management facility with explosions on site

Cleanaway Brooklyn Resource Recovery Centre - January 24, 2021 Major fire at waste recycling facility fuelled by plastic waste

Cleanaway Kwinana Technical and Environmental Services - January 7, 2020 Major fire at waste recycling facility fuelled by plastic waste Fire and Emergency Services issued a hazardous substances alert

Cleanaway Perth MRF - November 25, 2019 Multiple fires at this facility

Cleanaway Rockdale Resource Recovery Centre - June 11, 2022 Major fire fuelled by stockpiled plastic waste destroys MRF

Instant Waste Management - September 8, 2021 Major fire at recycling facility fuelled by plastic waste

Kriaris Recyclables Processing (MRF) Kunwarara QLD - August 29, 2020 Plastic-fuelled fire at material recovery facility

SEQ Waste & Recycling – No date provided Fire at recycling facility fuelled by plastic waste

Ophir Road Resource Recovery Centre - February 18, 2023 Fire at recycling facility fuelled by plastic waste

Veolia Welshpool Resource Recovery Centre WA - March 1, 2023 Major fire at recycling facility fuelled by plastic waste Multiple fires at this facility

Re.Group - December 26, 2022 Major fire at recycling facility fuelled by plastic waste

Noise & vibration incompatible with existing land uses

The RTS states:

“Construction noise levels during all stages of construction are predicted to result in noise levels above the Interim Construction Noise Guidelines (ICNG) Noise Affected Noise Management Level”.

There are **no guarantees** that any attempts to mitigate the noise can or will be successful in such close proximity to existing land uses.

During 24/7 operations, GHD admits the use of 20 tonne trucks for estimation is conservative, with actual load likely exceed that. A 20 tonne truck is estimated at 80 dB.

According to the Bioresources Australia submission over 60 dB is harmful to their work.

AVOIDING "The Least preferred route due to

"need for heavy vehicles to carry out a hook turn across a level rail crossing"

"Level crossing collisions between trains & vehicles are a MAJOR SAFETY RISK"

"Rail freight is predicted to increase by 90 per cent."

4.3.3 Option 3: North-south connection with Douglas Road

Option 3 includes access to / from the north of the plastics recycling and reprocessing facility site via Berrima Road, Douglas Road, Collins Road and a new constructed north-south road. This would require constructing a road in the existing road easement and expanding the existing level crossing area, to accommodate vehicles turning left out of the new road onto Douglas Road as shown in Figure 4.4.

During consultation with Council, this option was found to be the least preferred due to the need for heavy vehicles to carry out a hook turn across a level rail crossing associated with the Berrima Branch Line. Reference was made to *Level crossing safety - Transport for NSW and National Railway Level Crossing Safety Strategy 2010-2020* specifically, that level crossing collisions between trains and vehicles are a major road safety risk.

This is of concern given the projected growth in Australian freight over the next few decades: between 2010- 2030, truck traffic is predicted to increase by 50 per cent and rail freight is expected to increase by 90 per cent. In

Route issue 1: Safety

- Relocation of the current level crossing to the west introduces risks for other road users: particularly the owners and newly established businesses situated on Douglas Road, including those already operating and possessing approvals in the business park located on Redfield Road regarding safe access to travel east without having to perform a hook turn across the level crossing.
- There are 3 level crossings that any vehicles servicing the PRF will need to traverse before reaching the proposed North/South access road.

Route issue 2: Lack of practical onsite infrastructure analysis

- Douglas Road: No site survey: the place identified for the level crossing is at significantly different elevation to the road
- Braddon Rd: Currently being constructed and (privately funded) for a rural/ Environmental living subdivision of 2x 5 Acre lots. The 5 acre lots are zoned Environmental living due to the sensitive land and grade 2 riparian land that runs through the area. The EIS is misleading in that Braddon Road is essentially a country lane built to a minimum standard and needs to remain a residential road not only for the safety of residents but to stop heavy vehicles from driving through the residential streets of Moss Vale. Safety of pedestrians needs to be considered for children walking from school

Boral train (52 wagons) sitting on Plasrefine proposed relocated level crossing for 35 mins!!!!



Route issue 3: Nth-Sth Road in Riparian zone

https://water.dpie.nsw.gov.au/data/assets/pdf_file/0008/386207/licensing_approvals_controlled_activities_riparian_corridors.pdf

Changes to controlled activities within riparian corridors

On 1 July 2012 rules commenced regarding controlled activities within riparian corridors. The rules amend the riparian corridor widths that apply to watercourses, providing more flexibility in how riparian corridors can be used and making it easier for applicants to determine the department's controlled activity approval requirements.

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Table 1. Recommended riparian corridor widths

Watercourse type	VRZ width (each side of watercourse)	Total RC width
1 st order	10 metres	20 m + channel width
2 nd order	20 metres	40 m + channel width

- where suitable, applicants may undertake non-riparian corridor works or development within the outer 50% of a VRZ, as long as they offset this activity by connecting an equivalent area to the RC within the development site

There is no ability to connect an equivalent area to the Riparian Corridor to offset a road in the Riparian Zone within the scope of this proposal on this site.

Council's placement of the road corridor predates the 2012 DPIE Changes to controlled activities in Riparian Zones.



Microplastic pollution in post- filtration wastewater from PRFs

Brown, E., MacDonald, A. Allen, S., Allen, D. (2023). *The potential for a plastic recycling facility to release microplastic pollution and possible filtration remediation effectiveness*, *Journal of Hazardous Materials Advances*, (10). <https://doi.org/10.1016/j.hazadv.2023.100309>

1. *“the release of very high concentrations of small MPs, particularly environmentally relevant sized MPs of <math><10\mu\text{m}</math>.”*
2. *“Micro-plastics released relative to the tonnage imported to the plant is up to 0.06 tonne/tonne for post-filtration discharge. This equates to approximately 6% of the mass of plastic waste brought to the PRF for recycling (0.004-0.13 tonne/tonne).”*
3. This result *“is not insignificant to a receiving waterway of sewer network, Given that the discharged MP particles are predominantly <math><10\mu\text{m}</math> and therefore pose a risk to ecosystem health”*.

Implications for Moss Vale or Berrima STP:

- P119: Intention to discharge “up to 10,000 litres per day of wastewater to sewer each day”
- For a PRF processing up to 120,000 tonnes of mixed plastic waste per year, there is the expectation that our WWTP will be able to manage up to 7200 tonnes of Micro-plastic pollution per year.
- Key question: how do we manage that in Sydney's Drinking Water Catchment?



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- Building height: building height diagrams have not been adjusted, other than for building 1, which was 15.5 metres. Building 2 remains 16.7 metres.
- No emissions stacks on drawings: according to the document these are more than 22 metres high from ground level and 1.2 metres in diameter **times 4**.

In view of our research, this community respectfully requests that:

Wingecarribee Shire Council makes an amendment to its draft Submission in relation to the Moss Vale Plastics Recycling Facility, as follows:

1. Council oppose the proposed development in its current location.

For Wingecarribee Shire Council's position to be consistent with risk management and duty of care for our community, unequivocal opposition to this site's suitability for a Plastic Recycling Facility is essential.