



MAUREEN HORDERN

OBJECT

Submission ID: 216494

Organisation: N/A	Key issues: <i>Social impacts, Land use compatibility (surrounding land uses), Traffic, Other issues</i>
Location: New South Wales 2121	
Attachment: N/A	

Submission date: 11/21/2024 4:39:19 AM

I object to this project as it has potential harmful impacts for the community and Sydney's drinking water.

GHD is aware of the hazardous emissions in the event of fire and weather events, advising residents to limit time outdoors during such events. The risk of exposure to hazardous air events is too great a burden for the community, especially as there are many "sensitive receivers" and many families moved to the Southern Highlands for its clean air and to raise healthy families. Increased occurrences of Climate Change weather events have been happening all around the world and especially probable here as the Plasrefine site is on bushfire prone land. Ref: Rural Fire Service tool for bush fire prone land for address 74-76 Beaconsfield Road, Moss Vale

A large number of Local residents are of the view that this is not the right site for Reprocessing of Plastic and Recycling Plastic into powders, flakes and pellets because forever chemicals from plastic affect our health and this proposed site is too close to the following::

Streams actually located on the site which supply water for Sydney's Drinking Water, Agricultural industries and food production, schools, childcare centres, playing fields, platypuses in the Wingecarribee River, workers at the Industrial Park and Garvin Institute Mouse House. This Plastics facility proposal has upset so many for years but their concerns have not been heard. This process has created lack of trust in Government Departments and Agencies and in the Consultant GHD. The Southern Highlands residents choose to live where they do because they care about the environment and have chosen where they live accordingly. To place a Plastics facility there is to disrupt their way of life and livelihoods. The very reasons people choose to live in The Southern Highlands are negatively impacted by this Plastics Plant. The Plastic Recycling and Reprocessing plant will create great losses to the community. The negative impact on local food production, water, tourism, residential subdivision land sales, sale of residents' own properties, reluctance to be a worker in the industrial park, traffic, odour, noise and effects of forever chemicals would not be wanted in any township. If you would not like it in your backyard then others should not have it imposed on their backyard. It is too close to residents and workers, the land size of the site is not large enough for the proposal and its mitigation measures, so therefore it is not the right site.

PFAS

GHD's Dr Mark Bowman, Technical Director for Environment and Contaminants, whose letter dated 30th October 2024 has been lodged with the IPC in support of this project in response to concerns regarding microplastics and PFAS Emissions on the site. However, Dr Bowman had a conflicting opinion about plastics being near food and water stated by him at Clean-Up Conference in South Australia in 31 December 2022. Dr Bowman opinion then was that we need to ensure that unlike some of the challenges with PFAS, where they have been dispersively released and haven't been controlled, how we use those chemicals is the key takeaway. We need to really not let these chemicals out into the environment in the first place. We don't want it in our drinking water. We don't want them in our food. We want safe breathable air, and it is best to ensure that we are not releasing chemicals into areas that we are using for food and water.

I wonder if Dr Bowman realises that the Plastic Reprocessing and Recycling plant is proposed for a site containing riparian streams where the water flows to the Wingecarribee River and then to Sydney's Drinking



Water Catchment and that food production takes place on local land and that of the closest sensitive recipients.

How can there be trust when a GHD expert has two opposing opinions depending on who his audience is.

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The new Australian level for PFOA will be 200 and was previously 560 ng/l. The US has a maximum contaminant goal of 0.

The PFAS contaminants from Plasrefine should not be downplayed considering the closeness on the site of streams feeding Sydney's Drinking Water and close to sensitive receivers. Australian regulations have lagged behind but the science is emerging regarding the dangers of PFAS just like with asbestos and silica in the past.

TRAFFIC AND ROADS

Narrow country roads with so many trucks is a recipe for disaster. There will be an expected timeframe placed on the arrival of these trucks, as the doors are now estimated to be open for only 3.3 hours per day; note that the the trucks comings and goings are calculated like clockwork in this calculation. There is always the possibility of traffic hold ups with the long distances travelled by these trucks. The plant cannot operate whilst the doors are open which must create pressure for the trucks to arrive promptly. At the same time as truck arrivals and departures, local residents will be using the same roads - parents will be dropping children to school and childcare and estimating their travel time to reach their workplaces on time. Add to this the trucks that will be transporting the reprocessed plastic products, eg flooring. Also shift workers will be on the road at 3pm, stated by Department of Planning not to be peak time, but this coincides with the end of the school day and children will be walking and bike riding and parents will be driving to pick up school children. This amount of activity is not safe on narrow country roads which in a short time will become potholed from the continuous heavy usage.

LACK OF STRINGENT CONTROLS

In the Department of Planning Assessment there are so many Recommendations, eg it is recommended that:

an environmental officer be employed during construction and operation, a Community Consultation Committee be established before construction commences, preparation and implementation of Community Consultation Plan, preparation of Landscape Management Plan, Operational Traffic Management Plan, Traffic Control Plan, Heavy Vehicle Monitoring Plan and Operational Water Management Plan etc. etc. Where are the stringent controls that the residents rely on during Planning processes when the Department of Planning is only recommending and not directing for controls. Also the Assessment can only assess the design and the finished build could have many variations which could be unacceptable to locals and sensitive receivers, especially as the community's trust has already been tested. We are aware of compromises that are made during a build when funds are getting low.

CLARIFICATION REQUIRED

The manufacture of plastic powders only came to public notice in the Department of Planning Assessment Report. So speakers at the IPC meetings spoke of flakes and pellets, and only rarely did a local speaker mention powders because powders had not previously been disclosed by GHD. How can there be trust?



Even in the Assessment Report reference to powders is used sparingly but flakes and pellets are referred to more often.

GHD has depicted the Moss Vale population to be stagnant and old, when in fact it is growing and vibrant.

GHD has taken the greater distance measurement from Plasrefine site to sensitive receivers front letter boxes despite that it might be back boundaries that adjoin the proposed plastics facility site. Sensitive Receivers are entitled to use all of their land, including to the back boundary where they will receive greater impacts than GHD has allowed for by measuring a greater distance to property front letter boxes not the closer rear boundary near the Plasrefine site..

In a letter dated 15th November by David Gamble GHD to Mr Chris Ritchie, Acting Executive Director, Department of Planning Re: Information on vehicle access door opening periods. At the bottom of page 3 of this letter it mentions a negative air pressure system and then on page 4 it is stated that the measures will enable the plant to operate continuously whether the doors are open or not. I would like to reiterate that plastic powders could be in both buildings 1 and 2 and these powders are easily spreading microplastics..

Air Quality in the Assessment Report Page 45

This states to keep doors shut when not in use. It should also state that the doors should be shut when in use to prevent emissions and microplastics escaping from building 1, especially powders. Exceedances of PM 2.5 and PM 10 at the ABR should not be tolerated and shows that the proposed facility is too close to ABR. Lowering the height of the stacks is a concern as emissions are closer to ground level.

Microplastics in the Assessment Report Page 47

It is stated that the PE wood plastic floor production line in Building 2 would be the primary source of particulates. It ignores and does not mention the plastic powder in Building 1 which might be moved to building 2. The assessment report states that flakes and pellets would be moved from building 1 to Building 2. The powders are of concern as they are easily spreading microplastics.

Noise and Vibration Assessment Report Page 47

A land owner has the right to use all of their land. GHD measured the distance of sensitive receivers, not from their boundary that adjoins the potential development but from the letterbox at the very furthest extremity of the blocks. Therefore the sensitive receivers land is actually closer than GHD has stated so the impacts will be greater.

Operational and traffic noise Assessment Report Page 48 This states modelling of two worst case operational scenarios. Both assumed the roller doors were open. Under no circumstances should the roller doors be open when the equipment is operational so this modelling seems futile. (Refer to David Gamble's letter regarding new sourced roller doors dated 15th November 2024 and lodged with the IPC.)

Under traffic noise there is no mention of the 50 trucks per day reversing through the open roller doors with the beep beep beep beep beep reversing warning noise. Would this be under 2db stated for traffic noise?

The third paragraph in the Assessment Report on page 49 does not make sense in relation to Noise. It states To ensure operational noise remains as predicted, the Department recommends a range of stringent conditions including compliance with the operational noise limits and requiring all doors stay closed 'when not in use. This should read when in use. Note: There would be no operational noise if the equipment is not in use.

Although, under the heading microplastics, the doors should remain closed when not in use to prevent the escape of microplastics.

163 Fire NSW has advised that smoke would be hot and buoyant and therefore would rise directly upwards - not only the perfect conditions scenario. This is not taking into account bad weather and wind conditions at the



time and the type and amount of burning plastics. I worry that there is insufficient space around the buildings to fight a fire, where fire fighters can be a satisfactory distance from the hot burning building. In the event of a plastics fire, residents would need to evacuate as it is negligent to advise residents, especially sensitive recipients to shelter inside their homes in the event of a huge plastic plant fire. With black smoke and contaminants billowing. What are the impacts on Sydney Drinking Water if there is a fire needs to be highly considered?

Biodiversity

Platypuses in the Wingecarribee River - Australia is the only country in the world with these remarkable native animals so they need to be looked after. The Platypus is the only remaining semi-aquatic monotreme in the world. The International Union for Conservation of Nature lists the Platypus as near threatened.

Even minute traces of forever chemicals can accumulate to increasingly high levels in Platypuses, causing death by affecting their livers. Research suggests that platypuses are consuming the chemicals through their diet and through the sediment on the bottom of the creeks and rivers whilst consuming macroinvertebrates or water bugs that may also be contaminated.

Creation of Pasrefine Jobs

The Department of Planning states that Plasrefine will create 140 jobs in the Industrial Park. The truck movements and other negative impacts of noise, odours and emissions will affect the uptake of other business in the Industrial Park. I think that a Plastic Reprocessing and Recycling Plant with such a large footprint will have only negative affects on the area, reducing tourism jobs and reducing jobs in food production and agriculture.

I object to this project as it has potential harmful impacts for the community and Sydney's drinking water.

GHD is aware of the hazardous emissions in the event of fire and weather events, advising residents to limit time outdoors during such events. The horses, stock etc cannot be indoors. The risk of exposure to hazardous air events is too great a burden for the community, especially as so many families moved to the Southern Highlands for its clean air and to raise healthy families. Increased occurrences of Climate Change weather events have been happening all around the world and especially probable here as the Plasrefine site is on bushfire prone land. Ref: Rural Fire Service tool for bush fire prone land for address 74-76 Beaconsfield Road, Moss Vale

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Traffic and Roads

Narrow country roads with so many trucks is a recipe for disaster. There will be an expected timeframe placed on the arrival of these trucks, as the doors are now estimated to be open for only 3.3 hours per day; note that the the trucks comings and goings are calculated like clockwork in this calculation. What time allowance is there for truck delays; there is always the possibility of traffic hold ups with the long distances travelled by these trucks. The plant cannot operate whilst the doors are open which must create pressure for the trucks to arrive promptly. At the same time as truck arrivals and departures, local residents will be using the same roads - parents will be dropping children to school and childcare and estimating their travel time to reach their workplaces on time. Add to this the trucks that will be transporting the reprocessed plastic products, eg flooring. Also shift workers will be on the road at 3pm, stated by Department of Planning not to be peak time, but this coincides with the end of the school day and children will be walking and bike riding and parents will be driving to pick up school children. This amount of activity is not safe on narrow country roads which in a short time will become potholed from the continuous heavy usage.

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In a letter dated 15th November by David Gamble GHD to Mr Chris Ritchie, Acting Executive Director, Department of Planning Re: Information on vehicle access door opening periods, two diagrams are shown for roller door entrance into and exit from Building 1. The waste water treatment plant is located in front of part of the roller door in one diagram and the other diagram clearly shows the how trucks will reverse through the entrance and exit from the building but no WWTP is blocking the roller door. Is one to assume that there is enough room between the building and the WWTP for exiting trucks or will the WWTP need be relocated? Its confusing that two different diagrams are supplied for the same roller door; one with WWTP in front of part of the roller door.

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