



PETER SCOTT

OBJECT

Submission ID: 215818

Organisation: N/A	Key issues: <i>Social impacts, Other issues</i>
Location: <i>New South Wales 2037</i>	
Attachment: <i>Attached overleaf</i>	

Submission date: 11/19/2024 5:17:52 PM

I am concerned that the risks of air borne and water borne microplastics escaping from the proposed facility over a long period of time will result in significant cumulative health issues for the communities in Moss Vale and the surrounding environs including in the greater Sydney water catchment.

On page 46 of the MV Plastics Recycling Facility SSD 94099871 Assessment Report states that "DAF system at the WTP would capture more than 90% of the microplastic particles....."

What are the long term health consequences to the community of the ever increasing amount of microplastics escaping from the proposed facility?

On page 26 of the Assessment Report 5.5.3, there is a statement. "NSW Health advised it had no comments on the proposal". I ask has NSW Health thoroughly assessed the health risks associated with microplastics escaping from this proposed facility. If not why not !

How can the NSW Government allow this development to proceed without addressing the serious health risks associated with the ever increasing volumes microplastics escaping from the plant by air and/or water?

Findings and conclusions	Recommended conditions
<ul style="list-style-type: none"> • The AQIA explained that risks of health impacts from this would be low as exceedances only occur when background levels are high and ABR staff would be working in an enclosed building. • The AQIA found that odour generation potential would be minimal. Any operational processes with potential to produce odour would be carefully managed, for example filter cake would be bagged immediately. • NSW Health advised it had no comments on the proposal. • On review of the revised AQIA, the EPA advised that if a lower discharge concentration was permitted than was modelled, exceedances would not occur. The EPA recommended a range of operating, monitoring and verification conditions for the EPL, including an emission limit of 10 mg/m³ for Total Solid Particles which would ensure no additional exceedances of PM_{2.5} and PM₁₀ would occur. • Noting the community's concerns regarding air quality and to ensure any potential risks are managed in a timely manner, the Department has recommended a range of stringent conditions. These include undertaking a series of air quality validation events after commencement of operation (at six months, two years and full operation) which would ensure that if the development is not operating as predicted, additional contingency measures would be implemented in a timely manner. • The Department also recommends the preparation of an Operational Air Quality Management Plan (OAQMP) detailing how air quality would be controlled, which is to include the requirement for all doors to operational buildings to be shut when not in use. • The Department's assessment concludes the implementation of the recommended conditions would ensure air quality impacts are acceptable and can be adequately managed by the Applicant. If exceedances are identified by the verification process, a range of contingency measures would be implemented to ensure compliance with the relevant criteria. 	
<p>Microplastics</p>	
<ul style="list-style-type: none"> • Microplastics can be generated by physical, chemical and biological fragmentation of plastic. As crushing and moulding of plastic has the potential to create microplastics, concerns were raised by Council, the public and the EPA about the fate of microplastic particles in the environment. • All plastic recycling and processing activities would occur within enclosed buildings, with no plastic coming into contact with stormwater that is released offsite. The Applicant has advised process water from plastic washing activities would contain microplastics, however, the DAF system at the WTP would capture more than 90 % of the microplastic particles in dewatered filter cake. This filter cake would be taken to landfill as general solid waste and would not enter the environment. The remaining 10 % (up to 40 milligrams per litre (mg/l)) of microplastic particles would remain in the process water sent to sewer as trade waste (up to 10 kL per day at full operations). This level is well below Council's trade waste requirement for maximum total particulates of 300 mg/l. 	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> • undertake final design of the WTP in consultation with the EPA • include consideration of new technology for the reduction of microplastic in wastewater