

Information update – 6/08/20 HI QUALITY GROUP Pty Ltd, EIS201900001

Waste hub with integrated resource recovery at 4-16 Tennant St Fyshwick

Background: The following list has been compiled by the Kingston and Barton Residents' Group (KBRG) to inform representations to draft EIS201900001 submitted to the ACT Planning and Land Authority (ACTPLA) by Golder Associates Pty Ltd on behalf of the developer, Hi Quality Group Pty Ltd. Notification for public representations closes on 17 September 2020.

The location of the proposed waste hub is a 10 hectare site at 6-14 Tennant St Fyshwick next to the Molonglo River (463m distance) and 123m from a designated wetland (see Development MAPI- ACT Gov). Lease documents confirm the site was purchased from Rocla for \$8million. This is the site of the former Monier and Rocla concrete batching operations. It is believed that Rocla closed for concrete production around 2015. It is contaminated with asbestos.

Hi Qual has quarry and waste operations in Melbourne and Sydney. At Windellama, Minda landfill, 90km from Canberra, Hi Qual under NSW Environment Protection Licence 10398 at 2015 is allowed to accept 60,000tpa of general solid waste (non-putrescible), no more than 60,000tpa of asbestos waste, no more than 60,000tpa of tyres and any waste received N/A onsite that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time.

EIS201900001 identifies the following waste streams to be handled at the Tennant St site annually (note that sources of this waste are not identified). Details of the processes and techniques used for these streams is unclear. Holding ponds are not clearly explained.

The document appears to downsize and certainly does not explain the possible production of more than 300,000tpa of Refuse Derived Fuel/Processed Engineered Fuel (RDF/PEF) pellets for incineration outside of the ACT or for export. RDF/PEF production involves using waste previously destined for landfill. This dry waste of high calorific value including plastics cannot be recycled. In a shredded or pelletised form it is baled for transfer or export to be incinerated in cement kilns or used as a source of energy in power stations and waste to energy facilities. The proposed Fyshwick operation apparently replaces the Wetherill Park plant to become the largest PEF production facility in Australia (see note below).

Issues of concern with regard to the intended waste streams: Hi Qual is a waste company with a history of non-compliance in NSW. The company has previously been fined for multiple incidents on a number of occasions for breaches which included stockpiling of waste, exceeding the authorised limit, accepting waste that was not allowed at the landfill site, not covering waste and not paying waste levies.

The Hi Quality Group's draft EIS lacks clarity, is vague and inconsistent e.g. volumes of waste, hours of operation, source of waste "predominantly from the ACT" or from interstate including from the Hi Qual Minda Landfill at Windellama. It is difficult to gain an accurate description of all the waste to be handled and certainly the sources are not discussed;

- **40,000 tonnes of wood waste** – This wood is no longer to be burned onsite but doesn't account for the total amount. It will contain contaminants such as paint. Hi Qual says that there will be 31,000 tonnes of clean wood per annum but does not talk about processing. It appears it may now be chipped for the landscaping element of the business or end up in landfill at Windellema;
- **5,000 tonnes of grease trap waste** – "4,500 tonnes discharge to sewer is expected per annum." "The residual sludge waste will be removed from site by tankers for disposal to an appropriately licensed facility;" which is not specified;
- **30,000 tonnes of drilling mud** – "21,000 tonnes of recovered solids would be transferred to the onsite Soil Processing and Recovery Facility. Approximately 9,000 kL of liquid waste would be tested and classified for use on site for dust suppression or discharged to sewer under a Trade Waste Agreement;" We need to ask for the exact source of this drilling mud. It is described as "hydro-excavation". Drilling mud is a Class A Liquid waste;
- **5,000 tonnes of "Oily Water" another Class A liquid waste** – "2,000 tonnes of separated oils would be removed from the Site by a Contractor to an appropriate licensed

facility. Approximately 3,000 tonnes of liquid waste would be tested and used for onsite dust suppression or discharged to sewer under a Trade Waste Agreement;" Use of these waters as dust suppressant must be questioned;

- **250,000 tonnes of 'soil'** – "Any material that is not approved for beneficial re-use would be removed from the Site for disposal at the Proponent's Windellama Minda landfill site or other approved appropriately licensed facility;" The soil which cannot be used on site is described as contaminated soil.
- **2,500 tonnes of "secured asbestos material"** – "A maximum of 45 tonne per week" [equivalent to 2,340 tonnes per annum] "would be accepted and transported for disposal directly to a landfill licensed to accept asbestos waste." There is no information or reason for the asbestos to be received and transferred evidently with no processing of the waste; It is for temporary storage only. This entails double handling of that asbestos material and should be questioned. The EPA has previously said it does not support the double handling of asbestos. Secured asbestos material sounds benign, but this is not the case. It is otherwise called ACM, Asbestos Containing Material and is found in a vast list of items. It is considered harmful because as a waste product it has been damaged. The Minda Landfill at Windellama is licensed for up to 60,000tpa of asbestos.
- **32,000 tonnes of fly ash** to be used in concrete product; Fly ash is highly toxic and porous capable of leaching its heavy metals into the environment, soil, air and water. Note the Hydrological study for the EIS at [Appendix-J](#) found copper, zinc and chromium in the surface water of the Molonglo river up and downstream from the site. Fly ash is used in concrete batching which reflects on the history of the site under Rocla. Hi Qual maintains other sources but no other heavy industry was in that area of Fyshwick.
- **250,000 tonnes of Construction and Demolition (C&D) and dry Commercial and Industrial (C&I) waste** – This is one of the most worrying aspects. It is proposed to crush concrete, bricks tiles, masonry to make aggregate for the concrete batching facility and the landscape business. Activities will emit large volumes (unquantified) of fugitive dust about 30% of it in the finer fractions and a large quantity of that as respirable silica PM5. This is concerning for the workers and the business neighbours in the vicinity as silica dust in stronger winds can travel more than five kilometres. There is a lot of literature now on the non-occupational health impacts of silica dust. You may not get silicosis but there are a number of other nasty illnesses associated with silica. Compounding this is the fact that the crushing could also release the fly ash into the atmosphere. There will also be additional diesel fumes not contained in any building. None of these issues are addressed in the EIS which does not mention the word silica.
- **200,000 tonnes of building and demolition waste to be recycled** – residual waste "up to 500 tonnes per annum which would be directed to the Proponent's Windellema Landfill or other appropriately licensed facility and 14,500 tonnes per annum for beneficial reuse".
- **250,000 litres of admixtures** (not waste) for the concrete batching plant. There are a great number of these chemicals and substances required. The proponent needs to be asked for clarification. The fly ash is an admixture but not in a liquid form it seems.

Tonnage per year of the above waste streams totals 809,500 tonnes excluding the 250,000 litres of admixtures. Page 29 of the "[Fyshwick Resource Facility – Transport Impact Assessment](#)" indicates the tonnage of material processed per annum to reach 1,346,000 tonnes with no explanation of the discrepancy. The operation is 24/7 for 50 weeks of the year. The waste amount specified as 1.1million tpa and this is previously all landfill waste is far greater than the current amount of waste into Mugga Lane landfill. How is the waste accounted for?

Other issues of concern: Potential harmful impacts from such a large stalled enterprise in the middle of a valued commercial area are;

- Past company history of non-compliance is noted on the NSW EPA website. The NSW EPA Manager, Regional Waste Compliance said Hi Quality received a collection of fines reflective of the severity of their breaches. "*This landfill [Minda Landfill at Windellama] is in a sensitive environment where the potential for harm is a serious risk. It is disappointing that Hi Quality*

appeared not to be taking their environmental obligations seriously across a range of issues”, the manager said;

- From 2018 statistical record there are 59 people resident in Fyshwick;
- The expected traffic increases associated with 500,000 vehicle movements per year;
- Noise impacts from the crushing and grinding and vehicle operations on site;
- The impact of extra dust from the predominance of unsealed roads on the site. These are to be wetted but the EIS is confusing about whether this will occur before the truck movements or after the dust has risen. Both methods are common but rely on the manager to see that they are actually practised. Failure to wet the roads as required is one of the most common complaints in the mining industry.
- The issue of the stormwater and fugitive dust impacts on the Molonglo River and its wetland. The proponent has gone to a lot of trouble to manage the stormwater egress but he can do little about the fugitive dust settling over the fence and washing into the river. This is why we need to know the exact characterisation of the dust from the crushing operation.
- Health impacts from increased diesel fumes which have the ability to adsorb silica emitted in the processing of concrete by grinding, cutting, crushing or drilling in an open-air operation. The result is respirable crystalline silica and is deadly.
- Fire risk is common in waste facilities; and there is also bushfire risk as occurred in January 2020 at the Beard Recycling Centre where a “dangerous” fire closed down west Queanbeyan and the inner south suburb of Oaks Estate. This summer showed how dangerous this could be. Remember the 5 day fire in a similar concrete and dry waste facility at Pialligo and the Mitchell toxic fire.
- Greenhouse impacts. The diversion of waste from landfill will reduce the methane but this needs to be balanced with the greenhouse gas emissions created by carting waste into the ACT. We need to know where this waste is coming from. It will affect the traffic impact not only through Fyshwick.
- It is not clear how stockpiling outside the buildings is to be managed.

Note 1. The Transport Impact Assessment is available on the EPSDD website regarding EIS processes. Open draft EIS201900001 for all documents in reply to the ACTPLA Scoping Document.

Note 2. The largest resource recovery and Processed Engineered Fuel (PEF) plant in Australia is at Wetherill Park in Sydney and was the second facility of its type in Australia. It is owned in a joint venture between resource recovery company ResourceCo and Cleanaway, the plant is licensed to receive up to 250,000 tonnes a year of dry commercial and industrial, and mixed construction and demolition waste. From that amount the PEF production is 150,000tpa.

Note 3. In 2020 Minda Landfill at Windellama has opened Cell 3 and will be accepting fire waste from the south coast. The amounts to be received under licence may have been increased.

Some of the questions that are unanswered in EIS201900001-Integrated Resource Recovery Facility

6 – 14 Tennant St Fyshwick, Block 8 + 12 Section 28 - closing for representation Friday 17 September 2020

The purpose of an environmental impact statement (EIS) is to document that all potential impacts have been identified and all adverse impacts have been mitigated to the greatest extent possible.

It must be demonstrated that the need for the proposal outweighs all adverse impacts.

The main role of the EIS is to describe how building, running and closing the facility would affect the local environment. This includes its impact on the people living and working nearby. Overall, there are a lot of questions that need confirming about the Hi Qual proposal. This is to ensure its impacts

are correctly identified and assessed. Evaluating risk and the impact on the environment and human health and safety at this location is not possible when there is insufficient data on the sources, organisation and processing of the different waste streams.

- Where is the source of each waste stream and what will be the content of each waste stream? eg drilling mud, toxic fly ash, asbestos, construction and demolition/industrial waste, greasetrap waste, oily water, wood waste and other landfill wastes?
- Why is it better to build in Fyshwick than at the Hi-Qual Minda Landfill at Windellama NSW, 90km away?
- How much waste will be on-routed from Windellama to Tennant St? Where does the waste at Windellama come from?
- How does the extra traffic on ACT roads align with our net zero emission targets?
- Who will pay for the road maintenance and the upgrade of traffic controlling devices?
- How will different types of toxic and flammable wastes be separated and stockpiled on site, how will they be covered, and how long will they be left in situ before being dealt with?
- Why bring asbestos waste into Fyshwick and then to Windellama when that waste, if generated within the ACT, can go directly to Mugga Lane landfill?
- Why bring asbestos waste to Fyshwick and then to Windellama when that waste, if generated outside of the ACT, could go directly to Windellama?
- Where is the risk assessment of the manufacture of Refuse Derived Fuel/Processed Engineered Fuel RDF/PEF, including the impact on air quality in Fyshwick and where the product is burned?
- After heavy rains and if the sediment is stirred up and overflows from the bottom dam on the site, what will be the content of the runoff onto the adjoining land?

There are many more unanswered questions and confusion from this development which the community believes would be better situated outside of Fyshwick. There is insufficient information in regard to all the stages of preparation and treatment of each waste stream for recycling and processing into a marketable product. If you need clarification or assistance please contact info@isccc.org.au.

There is not sufficient need for this facility in Fyshwick to outweigh the adverse impacts to the urban environment and human health and safety. The EIS should be refused.