**BRIEFING BY CRS AT 16 IPSWICH STREET SITE**

**31 JANUARY 2018**

Discussion was purposeful, with a range of topics covered. The following notes refer to the main points that were of interest to me.

**Present**: Adam Perry, Ewen McKenzie, Chris Klootwijk, Barbara Moore, Imi Moore, Dietlind Sommer, Bruce Allan(?), Mrs XX? Allan, Leo Dobes.

**Context**: Adam Perry set the context by reiterating that CRS considers that progressing the original proposal for a recycling facility plus ‘energy production’ was too risky for CRS to pursue because of community concerns. This is consistent with his position when discussing the issue with me in mid-2017 when he claimed that they would only proceed if there were no risk of rejection because to do otherwise was bad business.

CRS is now proceeding on the basis of the revised 15 January 2018 Scoping Document NI2018-27 under section 212 of the *Planning and Development Act 2007*. ActewAGL is no longer connected with the project because incineration is not proposed. However, Adam Perry made it clear that circumstances could change in the future, either because CRS decides to revive the idea of an incinerator, or because the ACT Government decides to favour the possibility of incineration as it did some years ago. At this point, however, there is no intention of proceeding with an incinerator. Acceptance of this position by the community can only be based on taking CRS on trust, but there can be no absolute guarantee into the future.

CRS has begun a program of consultation with local business. It held discussions with Harvey Norman on the morning of 31 January 2018.

**Size of waste recycling facility**

The floor area of the recycling facility has been expanded substantially, leaving no room on the site (section 47: blocks 8, 9, 11) for an incinerator. Questions regarding the possibility of one day building an incinerator on the existing Access Recycling site on Lithgow Street were left hanging.

The reason for enlarging the recycling-only facility is to accommodate compressor machinery, because non-recyclable waste will not be incinerated. Trucks entering the facility will dump mixed waste onto the floor, followed by separation using magnets, air pressure, etc. Compressors will be used to produce bales of shredded recyclable material that can then be railed to markets. Other compressor machinery will be used to stuff non-recyclable waste into watertight standard multimodal containers that will be railed to Woodlawn for landfill. Compression of both types of waste will take place inside the facility, with forklifts used to load it onto railcars on the hardstand that is to be constructed parallel to the existing railway line.

**Odour**

CRS is optimistic that it can control odour because:

* Only 30 per cent of the waste is expected to be putrescible.
* Waste will be sorted immediately on arrival and packed into containers ready for shipment.
* Doors will be shut during operations, except for entry and exit of trucks.
* Air will be sucked into the facility (negative pressure) so odour cannot escape through doors, and will be vented from a chimney to ensure wider dispersal. Air turnover within the facility is expected to occur about five times a day.
* A carbon filter will be used to reduce odour. [CRS did not have details to hand, but it is likely that it could use activated carbon, enzymes or various biochemical means of reducing odour-producing bacteria.]
* Excessive odour within the facility would be an occupational hazard because the 40 or so employees working inside could be subject to vomiting, etc, and could not work effectively. CRS also pointed out that nearby business would suffer and complain. [CRS thus has an incentive to minimise odour issues.]

Use of external odour monitoring equipment was not discussed.

**Chimney plume**

Chimney plumes can pose problems for aircraft, depending on the velocity of emission, temperature and smoke.

CRS does not consider the plume from the chimney to be a problem. An incinerator would have produced a high temperature plume of potential concern to the airport. Recycling alone will be at ambient temperatures because no heat treatment will be used. According to CRS, CASA has been approached twice on this issue and has said that it has no concerns with the revised proposal.

**Fire**

CRS conceded that the risk of waste catching fire is a possibility, but considered it to be mitigated in several ways:

* Fires in landfill and open-air waste processing facilities are typically due to hot ashes or coals in the waste stream. Spontaneous combustion is also possible.
* The CRS facility will utilise heat sensing monitors on machinery used to sort waste dumped by trucks. Hot spots will be dealt with immediately.
* Separation of waste within the facility will also reduce the chance of fire.
* Fire suppression will be installed within the facility.

**Traffic**

CRS expects to handle 230 trucks each day, with entry from Lithgow Street and exit into Ipswich Street. Truck movements will be about every four minutes, with trucks turning around inside the facility and going through a chlorine wheel bath on exit.

Because the facility will operate until 10pm each day, truck operators will be able to choose their delivery times in order to minimise their own costs. [It is likely that they will therefore avoid peak traffic periods.] Traffic analysis indicates that peak period traffic loads would only increase by 0.3 per cent.

**Waste** **composition** **and** **sources**:

CRS expects to process 300,000 tonnes of waste per annum at the facility. This compares with 309,000 tonnes p.a. currently going to Mugga Lane landfill. Waste composition will be household waste and Commercial and Industry waste. Construction waste will not be accepted, except for cardboard, plastic, and wood offcuts, when, for example, a block of flats is being fitted out with white goods that come with packaging.

CRS will continue to accept waste from Palerang-Queanbeyan, consistent with current arrangements at Mugga Lane. Yass has a cost-effective landfill so would be unlikely to send waste to Canberra.

Composting of putrescible waste and its use in agriculture was considered for a site near Temora but technical risks, including odour, were considered too great.

Councils in the south of Sydney have a contract with Veolia to compost 140,000t waste per year at Woodlawn using a Mechanical Biological Treatment facility. However, the composted material is not permitted to leave the site and is therefore used only for mine remediation. It is financially viable only because of the high fees charged by Veolia and the fact that composted waste is not subject to the landfill levy applied to waste sourced from Sydney. But odour is a problem.

**Site contamination and remediation**

According to CRS, the tanks that had been installed and used for storage by Shell on the site had not leaked. Ground contamination was therefore limited to spills during unloading of fuel from rail tankers. The tanks themselves have been flushed and are clean.

According to CRS, site remediation has been completed, audited and certified. Bore holes have not revealed groundwater contamination.

Because the new facility will have a 2m high internal bund wall, future contamination is not expected to be a problem.

**Financial viability**

CRS considers that it can gain a financial edge over Mugga Lane by at least a few dollars at the gate, primarily due to:

* Construction waste will not be accepted by CRS because existing operators in Canberra already have the expertise and would be more efficient.
* Private waste (e.g. trailers) will not be accepted because content cannot be guaranteed in the way that commercial operators provide consistency.
* By maximising extraction of recyclable waste, rail costs will be reduced for transfer of putrescible waste to landfill at Woodlawn.
* Efficient compression of both recyclable and putrescible waste will increase the weight of bales and multimodal containers respectively, but will reduce rail costs due to lower volumes transported.
* Metal recovered during the separation stage will be transferred to the existing Lithgow Street Access Recycling facility [an economy of scope]. Access Recycling is owned by Mr Perry.
* Commercial-in-confidence agreements with the Woodlawn operator and Suez give CRS confidence that it can out-compete others. [However, CRS faces sovereign risk in the possibility of NSW imposing additional landfill fees at Woodlawn because only waste sourced from Sydney currently faces fees. This was not discussed.]
* CRS claims that it will receive no subsidies from the ACT Government. It did receive a $1million subsidy from the NSW Government to build a hardstand (rail platform). Even though the hardstand is located in the ACT, the NSW Government justified the subsidy on the basis that use of rail to transport waste would reduce the number of trucks on roads, particularly from the Access Recycling metal recycling business accessing the port of Botany and clogging up tunnels. Transport for NSW will also gain $1.30/tonne/km fees for rail carriage.

Leo Dobes

President

Griffith Narrabundah Community Association

31 January 2018