


From: 
To: EPD_Customer_Services
Subject: Submission
Date: Monday, 11 June 2018 3:13:33 PM

SUBMISSION AGAINST
DRAFT EIS MATERIALS RECOVERY FACILITY - FYSHWICK
201700053
EPDCustomerServices@act.gov.au

Dear Minister,

It is likely that the MRF building because of its outlandish size will be built over some of the most contaminated soils left by the old Shell bulk fuel depot and would therefore collect benzene vapours which are known carcinogens.

The 4 Corners Program on Monday 21st May "Complicit" highlighted the terrible health impacts for workers in contact with benzene in a confined space or building.

The danger was recognised in the Draft EIS by the Site Auditor who would not endorse a changed purpose from fuel depot unless the existing configuration and buildings were used. Obviously this is not possible. The proponent recognised the difficulty and dangers he was creating when he committed to the installation of a very expensive flexible membrane vapour barrier under the slab.

Occupation and Safety concerns demand that this barrier be demonstrated as effective. It has not been. Detailed information about its specifications, installation methods and past performance was not supplied. This is unacceptable and must be rectified. Without details of this kind no meaningful or reliable judgement on its effectiveness can be reached. By law the EIS process is supposed to provide sufficient detailed information to allow assessment. The EIS fails to make it clear whether the vapour barrier would also be installed under all the buildings on the site or just the MRF. This must be clarified. The car park area will also cover one of the BTEX "hot spots" and so should also be protected so that toxic vapours do not enter parked vehicles and endanger the health of the unaware drivers. The HIA should have considered these issues but did not.

This submission asks you the responsible Minister, to seek these details and put them out for public comment. The Unions would be most interested in the health and welfare of their members employed in the MRF by CRS.

As Minister you should also seek suitably qualified experts to examine the dangers and risks and evaluate them against the performance and reliability of the proposed vapour barrier once its specifications have been revealed. An Inquiry Panel would be the suitable mechanism for this.

With respect,

