

# Hume Waste Plastic to Fuel Facility

## Submission in response to Draft EIS

Email: [epdcustomerservices@act.gov.au](mailto:epdcustomerservices@act.gov.au).

### FOY

#### Landfill Diversion Facility

FOY Group proposes to construct and operate a facility which converts waste plastics into road transport fuels. The facility will be capable of processing 200 tonnes of plastic waste per day in its ultimate configuration. The facility is proposed to be constructed in the Hume industrial area.

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The ‘public’ meeting, held on the evening of Tuesday 30th August at Rose Cottage, was not widely advertised. Nevertheless, the meeting was very well attended. Furthermore, the attendees had tried hard to apprise themselves of the implications of the proposed development. And, numerous serious concerns were raised.

Questions arising from the meeting:

- Possible **emissions** and concern over **proximity to established and proposed housing in the Tuggeranong area?** Note: the facility would operate 24 hours a day.  
*The site is approximately 1300 metres to nearest residence in MacArthur*
- Possible **emissions** and concern over **proximity to established and proposed housing on NSW/ QPRC land** to the east of Hume?  
*No acknowledgement of the advanced planning processes for residential development at Tralee, NSW*
- G6 emission targets NSW used to model target limitations for this site?  
*It appears that the distinctive topography and the effect of emissions when factored in to the phenomenon of the local inversion layer have NOT been taken into account.*
- The extent of any **consultation with QPRC?**  
*QPRC reports that there was a limited briefing with QC officers earlier in year*
- **Projected future expansion** of the proposed facility and the impact on the surrounding industrial and commercial areas?
- Projected future expansion of the proposed facility and the impact on the residential areas in the immediate vicinity, in the ACT and NSW?
- Projected future expansion of the proposed facility, involving an increase in heavy vehicles from various states and the impact on the local road network, including the Monaro Highway?  
*B Double trucks are expected to travel from SA, Vic., NSW and Queensland in order to supplement the (insignificant) ACT and regional contribution of non-recyclable plastics*

- **Reported absence of applicable EPA guidelines in ACT** (need to refer to NSW EPA Guidelines)?
- **What other locations were identified** as suitable for this facility and why? Is there any background documentation to shed some light on the identification process?  
*The proponents reported that the LDA sold the Hume site stating that it was the most suitable of three potential sites (other sites NOT revealed.)*

Note: The meeting questioned the (reported) LDA recommendation and suggestions were made about other potentially more suitable sites such as Majura Parkway area and Woodlawn, NSW. It was noted the Woodlawn Facility would have the advantage of access to non-recyclable plastics serviced by a fully operational railhead.

- **Assessment of fire risks –**
  - a) internal i.e. arising from a catastrophic failure of the plant and, or, an accident involving the transportation of the fuel?
  - b) external i.e. impacting on Hume and the plant from an external source e.g. bushfire, or from another of the more volatile industries which are amassing in the immediate area of Hume?

*The proponents appeared to be unaware of the history of bushfire movements through this valley. Furthermore, they did not appear to be aware of other industries with a poor record of fire containment.*

1. **Heritage considerations** in the Couranga Crescent Precinct adjacent to the ‘preferred site’?

*There is a heritage registered property in Tralee Street in close proximity to the proposed facility.*

- **The possibility of Copper Chrome Arsenate contamination in the immediate area** emanating from the now abandoned Koppers Log Plant to the east of the block?  
*The serious contamination of the Koppers Log site has been the subject of court action in recent years. The detailed report into the condition of the land in the immediate area, completed in 2014, expresses reservations about ground water contamination of adjacent sites.*

See: **Coffey Partners Report dated 24th July, 2014**  
**Land Development Agency, Groundwater Investigation**  
**Stage 1 Development Area - Monaro Highway, Hume, ACT, 24 July 2014**

*Note: Copy of report supplied to Purdon Planning*

- Has the **sheep dip contamination** at the subject site been remediated and the block approved as fit for purpose?  
*There was a working sheep on the site of the proposed FOY development prior to resumption of the land for light industry*
- **Is the proposed FOY plastics to fuel facility classified as ‘light industry’?**

The meeting held on the 30<sup>th</sup> August was informed that, on the one hand, the National Library repository and a ‘secure’ Data Storage Facility are located in Hume, while, on the other hand, the (problematical) hydrocarbon products facility, located in Mitchell prior to a serious fire event, is now fully operational in the same industrial precinct. These are examples of businesses which are collocated but which do not appear to be ‘good neighbours’.

There is an urgent need for an holistic approach to planning in the Hume industrial estate, in particular, with a attention being paid to the type and mix of businesses (professional suites, entertainment, shopfronts etc.), and, the type and mix of light industry, storage facilities and other industries which have emerged during the period of oversight by the LDA.

The ACT Government Scoping Document Form, and attachments, dated 27 April 2016, elucidates the matters to be covered as part of the Draft EIS. These matters include justification of the chosen location; potential impact on surrounding areas including adjacent Canberra suburbs and the planned housing at South Tralee; examination of the site for possible contaminants; the level of fire risk, from the proposed facility itself and from the immediate area; possible environmental impacts in the short and long term.

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**In conclusion, the FOY Group response to the ACT Government requirements, dated 27 July 2016, does not adequately address the matters identified in the government scoping documentation. Furthermore, the FOY Group response to the ‘public meeting’ which followed does not address the many serious concerns which were expressed by attendees at that meeting.**

23 Sept. 2016