

From: Lauren Stevens
Sent: Mon, 8 Apr 2019 14:58:59 +1000
To: 'ainsley.bruem@rms.nsw.gov.au'
Subject: RE: DA016/19 - Wallerawang Power Station
Attachments: 190404 Letter to LCC response to submissions DA016_19 asbestos.pdf

Hi Ainsley

Please refer to the attached response from Energy Australia regarding the above mentioned development application.

Yours Sincerely

Lauren Stevens | Development Planner

Economic Development & Environment | [Lithgow City Council](#)

Phone: (02) 6354 9999 | **Fax:** (02) 6351 4259

#ECMBODY

From: BRUEM Ainsley [<mailto:ainsley.bruem@rms.nsw.gov.au>]

Sent: Friday, 15 March 2019 1:40 PM

To: Lithgow City Council

Cc: Development Western

Subject: RE: DA016/19 - Wallerawang Power Station

Dear Hanna,

Please find attached Roads and Maritime Services submission for the above proposal.

I apologise for our late reply to this.

Could I ask that you also confirm receipt of our previous correspondence forwarding our submission for DA015/19 sent to Council on 12/03/19?

With thanks,

Ainsley Bruem

Acting Manager

Land Use Developments

Western Region | Regional Customer Services

T 02 6861 1449 M 0408 571 088

www.rms.nsw.gov.au

Every journey matters

Roads and Maritime Services

Level 1 51 - 55 Currajong St Parkes NSW 2870

PO Box 334 Parkes NSW 2870

-----Original Message-----

From: Lithgow City Council [<mailto:council@lithgow.nsw.gov.au>]

Sent: Thursday, 14 February 2019 11:09 AM

To: Development Western

Subject: DA016/19 - Wallerawang Power Station

Dear Sir/Madam

Please find attached letter in relation to DA016/19.

The plans and documents can be downloaded through the following link -

<http://archive.lithgow.nsw.gov.au/download/EIS-Asbestos-Disposal-Area-Rev2-collated.pdf>

Kind regards

Hanna Peachman | Development Administration Assistant Economic Development & Environment |

Lithgow City Council

Phone: (02) 6354 9999 | Fax: (02) 6351 4259

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4 April 2019

Mrs Lauren Stevens
Developer Planner
Lithgow City Council
PO Box 19
180 Mort St, Lithgow NSW 2790

Ref: A1419278

Dear Mrs Stevens,

DA016/19 - Proposed Asbestos Disposal Area - Part Lot 5 DP 829137 Wallerawang Power Station Main Street, Wallerawang NSW 2845

I refer to the letter from Lithgow City Council dated 18 March 2019 regarding the above Development Application for an asbestos disposal area adjacent the approved ash repository associated with the currently closed Wallerawang Power Station. EnergyAustraliaNSW response to the submissions received from the community and regulators following the exhibition of the Development Application is provided in **Attachment A**.

Please contact me if you have any questions relating to the above on 02 6354 8102 or at Ben.Eastwood@energyaustraliansw.com.au.

Yours Sincerely,

Mr Ben Eastwood
NSW Environment Leader
EnergyAustralia NSW

ATTACHMENT A

Submission received from Roads and Maritime Services (RMS)	EnergyAustraliaNSW Response
The documentation submitted states: <i>"no further assessment of traffic impacts is proposed as part of this EIS". However, Roads and Maritime is of the opinion that there may be potential for transport related impacts as a direct result of the following:</i> • <i>During the closure and rehabilitation phase about 750 truckloads (i.e.1500 truck movements) would be required to transport capping material to the site.</i> • <i>This material may be sourced from the Sydney metropolitan area.</i> • <i>No traffic movements or impacts are anticipated on public roads during the operation of the Proposal.</i> • <i>Further clarification is sought regarding whether the shortfall in capping material would be required during the construction and or operation phase of the Proposal.</i> Further information of these potential impacts is requested in order for Roads and Maritime to undertake a thorough assessment. The impacts of transporting material should include, but not limited to: • <i>Cumulative traffic impacts of surrounding developments approved or proposed.</i> • <i>Traffic volumes of this material are to also include a description of:</i> ○ <i>Peak times for existing traffic.</i> ○ <i>Peak times for project-related haulage.</i> ○ <i>Transportation hours.</i> ○ <i>Project related traffic interaction with existing background traffic and traffic generated by proposal.</i> • <i>The origin, destination and routes for:</i> ○ <i>Heavy vehicle traffic.</i> ○ <i>Oversize and over mass traffic.</i> • <i>Local climate conditions that may affect road safety for vehicles used during construction and operation, of the project (e.g. fog, wet and dry weather, etc.)</i> • <i>Haulage operations coinciding with local school bus pick up/drop off times are to be avoided.</i> • <i>Details of the management of the haulage of these materials to site.</i> <i>Details of the management and coordination of these heavy vehicle movements and measures to limit disruption to other motorists. This should also include strategies and measures employed to manage the risks of driver fatigue, road hazards and driver behaviour.</i>	Traffic impacts have been previously assessed for the import of capping material to the Wallerawang Ash Repository where the proposed asbestos disposal area is located. EnergyAustraliaNSW submitted a Modification to Project Approval 07_0005 for the Kerosene Vale Ash Repository (KVAR) to the NSW Department of Planning and Environment for the import of capping material outside of the Lithgow Local Government Area at up to 100 truck-loads per day (200 truck movements) for a two-year period. It was anticipated that the majority of capping material would be sourced from major infrastructure construction projects occurring in the Sydney Region. The Modification was granted by the Minister for Planning on 26 November 2018. The Modification assessed potential traffic impacts associated with the import of capping material in the Environmental Impact Statement (EIS) which supported the application. Section 4.4.2 of the EIS assessed that based on the maximum anticipated delivery rate of 150 trucks per day (later reduced to 100 trucks in the submissions report) and assuming all deliveries came from the one source, the project would result in an increase of 1.7% (all vehicles) and 8.6% (heavy vehicles) along that section of the Great Western Highway, which was not expected to be noticeable by road users. Increases of traffic volumes on the Castlereagh Highway between the Great Western Highway and WWPS were expected to be low and minor in nature. Overall traffic impacts would be expected to be lower than when WWPS was operational. EnergyAustralia NSW does not intend to increase the number of approved truck movements for the import of capping material specifically for the asbestos repository. The 750 truckloads of capping material required would be imported within the approved KVAR allowance. Therefore, the capping material required for the asbestos disposal area was already considered and approved in the Modification to PA 07_0005 as described above. Further to the above, the NSW Department of Planning and Environment approved the Operational Transport Management Plan (OTMP) on the 21 November 2018. The NSW Roads and Maritime Services (RMS) approved the OTMP for the import of capping material in its correspondence dated 6 November 2018. The approved OTMP further addresses the matters raised by RMS in its submission. The asbestos disposal area is located adjacent to the Kerosene Vale Ash Repository and forms part of the overall closure and rehabilitation of this area. The proposed asbestos disposal location and the areas containing asbestos are internally connected via the Angus Place Coal Haul Road, an internal private haul road, and do not require the use of external roads for access.

	Subsequently, no traffic movements or impacts are expected on public roads during the transport and disposal of asbestos contaminated materials from Wallerawang Power Station to the proposed disposal area at KVAR. No further assessment is required beyond what has been approved as the number of trucks carting material to the Wallerawang Ash Repository will not exceed the approved 100 truck-loads per day.
Submission received from local resident	EnergyAustraliaNSW Response
1. How will you ensure that all safety measures are met to the people of Lidsdale and Wallerawang, 2. The development will have detrimental effects on people's health and safety	The proposed asbestos disposal area is located in a semi-rural area with few residential and commercial land uses nearby. The nearest residential properties are around 300 metres from the proposed disposal area. The Environmental Impact Statement (EIS) for the Asbestos Disposal Area found that the proposal would have a minimal impact on the community due to the large distance between the proposed asbestos disposal area and the nearest sensitive receivers. Neighbouring residents would be provided with a contact number for enquiries any complaints during the project. EnergyAustraliaNSW has a Community Consultative Committee (CCC) which was formed in 2007 to share information and build relations with the local community. The group meets quarterly. EnergyAustraliaNSW has consulted with the CCC since 2016 regarding the Wallerawang DDR project, including the asbestos repository. This group would provide a forum for the people of Lidsdale and Wallerawang to raise any concerns regarding health and safety. One of the objectives of the project is 'avoid the need for asbestos waste to be transported on public roads', which would minimise the safety risk of the project. Asbestos waste generated by the closure of WWPS would be buried and encapsulated within the asbestos disposal area. The proposed asbestos disposal area would have a footprint of up to about 1.8 hectares. It would comprise six 250-metre long trenches that would be excavated to a depth of about three metres and width of about three metres (see Figure 2-1 in SEE). The trenches would be spaced about three metres apart. If more waste is generated by the WWPS Closure Project than currently estimated, additional trenches would be excavated in the temporary stockpile area, in the northern section of the footprint of the proposal. The trenches would be excavated progressively and would be filled to a depth of about 2.5 metres with bagged or wrapped asbestos waste (see Section 2.2.1). This trench-and-fill method would enable the length of open trench to be matched to the volume of asbestos waste being generated by the WWPS Closure Project at any one time.

	This would simplify the day-to-day maintenance of the proposed asbestos disposal area by minimising the need for management of erosion and sediment control, soil stockpiles and dust. The management of asbestos materials and disposal of asbestos contaminated waste material to ensure the safety of works and the community is described in detail under Section 2 in the EIS. As described in the EIS the key works to construct and operate the proposed asbestos disposal area to ensure public safety include: • fencing the boundary of the proposed asbestos disposal area and erecting signage at the entrance(s) to the area; • prior to ground disturbance works commencing, installing stormwater management controls to minimise erosion and sedimentation at the proposed asbestos disposal area; • progressively clearing the proposed asbestos disposal area and mulching the removed vegetation; • progressively stripping topsoil and temporarily stockpiling it nearby; • progressively excavating trenches and temporarily stockpiling the excavated material. • disposing of asbestos waste into the open trench to within 0.5 metres of the existing ground level; and • backfilling the trench with capping material and once all asbestos waste disposal has occurred, placing a mound over the trenches and dressing it with topsoil and vegetating it. As described in the EIS, to ensure the safety of the work force and community asbestos waste will be managed in accordance with two separate plans, these will include the Asbestos Removal Control Plan and the Asbestos Management Plan. The Asbestos Removal Control Plan, as described in the EIS, will be prepared by a licenced asbestos contractor and in accordance with the requirements of the Code of Practice, <i>How to Safely Remove Asbestos (SafeWork NSW 2016b)</i>. The Asbestos Removal Control Plan would include measures such as: • asbestos waste and soiled personal protective equipment would be double-bagged or double-wrapped in 0.2-millimetre thick heavy duty, low density polyethylene plastic bags or wrapping, marked 'asbestos waste' and sealed by tape; • sealing of work areas; • dust suppression and decontamination procedures for staff and bagged material leaving the removal area;
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	• environmental and personal air monitoring requirements to ensure the controls that are implemented are adequately managing the risk; • requirements for transporting the asbestos waste from WWPS to the landfill, including that trucks be lined, leak proof and always covered. An Asbestos Management Plan, as described in the SEE, would be produced for the operation, closure and rehabilitation of the proposed asbestos disposal area. The plan would address the requirements for the disposal of asbestos waste outlined in Section 80 of the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> and would include correct operational procedures and handling and control measures to minimise the health risks to workers and the community during the unloading and disposal of asbestos waste, procedures for backfilling trenches filled with asbestos waste and environmental and personal air monitoring. Specifically, the Asbestos Management Plan will address matters such as: • once asbestos waste has been disposed of into the trench, applying an immediate covering of natural site soil at a minimum thickness of 150 millimetres; • at the end of each day, applying a cap of at least 500 millimetres at the top of the trench; • once all trenches are completed, applying a final capping layer of at least 2.5 metres to form the final landform; • asbestos waste and no other waste materials including incompatible waste materials would be disposed of within the disposal area. The Asbestos Management Plan would identify a range of measures to make sure that the site remains intact and is not subject to any disturbance, including appropriate fencing and warning signs displayed, appropriate design and stabilisation of the capping layer including a marking layer, and ongoing monitoring for dust and fibres as required. The Asbestos Management Plan would consider preparation of the site for future use, which includes protecting people, flora and fauna on or near the site from exposure to pollutants. With these measures in place, it is not expected that the development will have detrimental effects on people's health and safety.
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