

Proposed Red Hill Waste Management Facility Waste Water Treatment Plant

CONCERNS AND OBJECTIONS

The following brief summary of concerns and objections relate to the Information shared at the Community Liaison Meeting held on the 5th September 2007 and the release of the 'Waste Water Treatment Plant Review Report' dated 18th September 2007.

1. As stated in the executive summary – issues associated “are mainly odour and the attraction of certain disease carrying vermin” further, “Odour issues are mainly due to extended on site storage, inappropriate chemical dosing and seasonal impacts of temperature and wind velocity. Vermin relates to flies and scavenging birds able to spread disease outside the WWTP facility”. ***The Neighbouring areas of Red Hill already have disproportionately high numbers of flies and issues related to the numerous and varied scavenging birds as a result of the Waste Management Facility without adding to these existing, unreasonably high levels and potential for further spread of disease. ‘Under the health act 1911 (amended 1976) it is illegal to breed flies in WA’ which this would indeed be doing by compounded proportions. Whilst this may not be by intent it would be by practice.***
2. The review fails under ‘Site Characterisation Climate’ 2.5 Catchments to recognise nor emphasise ‘Christmas Tree Creek’ and its lakes/dams and many tributaries, some of which flow directly off the existing Red Hill Waste Management site into the creek ecosystem. Christmas Tree Creek is the closest of all waterways (approx 200 meters or so) to the Waste Management site. Due to the significant down-gradient water run-off flows directly off the management facility into the Christmas Tree Creek system, which inturn flows into Jane brook and then the Swan River. ***The environmental risks of this are substantial to both flora and fauna (as outlined in Section 8 and 3) and given that both Christmas Tree Creek and Jane brook run through one of Perth’s premier national parks (John Forrest National Park) this should be an enormous deterrent and reason alone for an alternative site.***
3. In line with point 1 and 2 above the report Identifies under ‘6.5 Facility Location’ “The most significant issue for siting the WWTP is buffer for odours and recognition of the threat to the adjacent John Forest National Park posed by the emission to surface waters of raw or treated effluent through equipment failures” and I would suggest other issues foreseen or otherwise related to natural issues inclusive of flooding, fire, geological causes etc etc... ***The Neighbouring areas of Red Hill already have disproportionately high levels of odour as a result of the Waste Management Facility without adding to these unreasonably high levels. As the report states clearly under 10.1 ‘Odour’ “Despite implementation of best National practice odour management, there will be a base level of odour emissions as a result of the discharge of high contaminant loads and/or plant upsets” alone. When you add this to the existing Odour levels at times again this is unreasonable.***
4. Section 6 ‘WWTP Technology’ stipulates that the WWTP will operate 24hrs a day with peak pumping periods occurring early morning and early evening. “Noise associated with the operation of pumps, compressors and /or aerators will occur consistently,

however the low level noise impacts (anticipated at <40db) will be most noticeable as ambient noise levels decrease after 20.00hrs". *What is not mentioned is the 'high level noise impacts' in a very quiet and peaceful area where these noise impacts become significant. Again adding to the past and existing noise associated with the Red Hill Facility and Power Plant this is an unreasonable proposition.*

5. Section 11 states that "the stimulation of development due to improved infrastructure may compound negative aesthetic and amenity issues associated with current landfill activities and compromise landfill buffers". *Agreed given the proposed size of this operation and potential for further expansion in the future with other planned developments in the Gidgegannup area.*

The final points to make are again reflected verbatim from the report and signify the clear inappropriate nature of the Waste Water Treatment Facility being located on the Red Hill site "The development of a wastewater treatment plant at the current Red Hill Waste Landfill Facility, or any site in close proximity to John Forrest National Park, runs risks associated with discharges to the environment. The Red Hill facility that has a common boundary with the National Park has increased potential for risk due to the proximity of the park". Additionally "potential failure of sewerage pipelines is an ongoing concern for infrastructure older than 10 years (due to sulphur attack on pipelining). The risk to flora and fauna (Section 3) in the down-gradient John Forrest National Park from spills and catastrophic failure is significant". Section 8 'Effluent' further outlines these risks.

By the reports own admission in the Executive Summary "**Overall the risks associated with EMRC leasing land to Water corporation for development of an onsite WWTP outweigh known on-site requirements for reuse water supplies or the estimated revenue of such an arrangement**". For the above reasons and the ongoing compounding effects related to many existing and unresolved issues that already exist at the Red Hill Waste Management Facility (raised with the EPA and EMRC 13/01/05 and again on the 16/01/07), we vehemently oppose the introduction of a Waste Water Treatment Plant at the Red Hill Waste Management site or any adjoining land (where a title may be transferred to Water Corp.) where any identified risks are still present. This may move responsibility and negative publicity away from EMRC however the environmental and social impacts remain the same.

When we purchased our property in 2002, the development selling agent stated that the Red Hill Facility had a license and lifespan of 5 years at which time there was significant funds allocated to ensure that it became national park as with the adjoining forest. To our surprise the operations have dramatically increased in size and impact. With an estimated increase of population in the immediate vicinity of 2,617 proposed lots/residences and 7,142 people overall (in the very near future as part of the adjoining Parkerville and Stoneville Developments) combined with the existing environmental concerns raised with the EPA the only reasonable outcome would be for Red Hill Waste Management Facility to consider down scaling their future operations rather than such a risk adverse proposal to increase them.

Yours Sincerely

Name withheld