



NOTICE IS HEREBY GIVEN that of a meeting of **Community Environment Committee** will be held:

DATE: **Wednesday 20 February 2013**

TIME: **7.00pm – 8.30pm.**

PLACE: **THE MANLY ENVIRONMENT CENTRE, 41 BELGRAVE ST, MANLY**

COMMITTEE MEMBERS:

Councillors

Cllr Jean Hay AM, Mayor (ex officio)	Manly Council
Cllr Cathy Griffin	Manly Council
Cllr Hugh Burns	Manly Council

Other Representatives

Susan Buchan	Community Representative
Michella Burgers	Community Representative
Diana Deeley	Community Representative
Jacqueline French	Community Representative
Natasha Hammond-Deakin	Community Representative
Lloyd Keen	Community Representative
Keelah Lam	Community Representative
Neil Ohlbach	Community Representative
Dr Jan Ritchie	Community Representative
David Thomas	Community Representative
Karen Pitt	Community Representative
Lee DeGail	National Parks & Wildlife Representative

Council Staff

Judy Reizes	Manager, Manly Environment Centre
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All other Councillors are free to attend as observers and are invited to do so and to engage in discussions, but not in voting, on any matter before the Committee.

Stephen Clements

Deputy General Manager, Executive Manager, Landuse & Sustainability

Date: 14 February 2013



AGENDA

COMMUNITY ENVIRONMENT COMMITTEE

MEETING TO BE HELD ON Wednesday 20 February, 2013

at 7.00pm.

THE MANLY ENVIRONMENT CENTRE, 41 BELGRAVE ST, MANLY

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| ITEM 1 | Apologies and leave of absence. |
| ITEM 2 | Declarations of Interest – Pecuniary
Non - Pecuniary |
| ITEM 3 | Confirmation of Minutes of Meeting 12 December, 2012 and Matters Arising. |
| ITEM 4 | MEC Eco Awards - Closing date for Nominations Friday 1 March |
| ITEM 5 | Long-Nosed Bandicoot Monitoring in the Residential Area –
Update on Stage 1 and briefing on upcoming Stage 2 |
| ITEM 6 | Penguin Warden Report |
| ITEM 7 | Update on North Head Sewage Treatment Plant –
see attachment from Council Meeting 11th February |
| ITEM 8 | Cabbage Tree Bay. <ul style="list-style-type: none">• Friends of Cabbage Tree Bay Volunteer Group• Day at the Bay – Sunday 21 April, celebrating Earth Day |
| ITEM 9 | Climate Action Summit 2013 |
| ITEM 10 | MEC AND Current Local Environmental issues Report |
| ITEM 11 | General Business brought to the Attention of the Chair Prior to the Meeting and Approved for Consideration. |
| ITEM 12 | Next Meeting: Wednesday 13 March, 2013 at 7.00pm. |

TO: Ordinary Meeting - 11 February 2013
REPORT: Notice of Motion Report No. 4
SUBJECT: Ongoing problems with North Head Sewerage Treatment Plant
FILE NO: MC/13/11698

Councillor Barbara Aird will move that:

Manly Council calls on the Premier of NSW to:

1. acknowledge the adverse impacts (particularly odours, health concerns and sludge trucks) and concerns of the Manly community and Manly Council over many decades in regard to the North Head Sewage Treatment Plant.
2. urgently begin the planning process to remove the ocean outfall and close the North Head Sewage Treatment Plant.
3. immediately take steps to implement at the North Head Sewage Treatment Plant, the "ultimate aim" of section 27(1) of the Sydney Water Act 1994, which states, inter alia "the corporation is to adopt as an ultimate aim the prevention of all dry weather discharges of sewage to waters, including from ocean outfalls, except to the extent that this is necessary to safeguard public health or prevent environmental degradation, or both."
4. explain why despite continual licence breaches at North Head Sewage Treatment Plant there have been no prosecutions.

(cc to Ministers and Shadow Ministers for Environment and Heritage, and Health, Local Member for Manly, Sydney Coastal Council Group, L.G.S.A)

Background

Over many decades, Manly residents and Council have raised concerns about adverse impacts from the North Head Sewage Treatment Plant. Odours, health issues and sewage sludge trucks continue and there is still only primary treatment of the sewage before being dumped into the ocean. There are no plans to phase out ocean outfalls, although many developed countries throughout the world have now outlawed this. In fact, the operations at North Head continue to grow. State Government still draws major dividends and taxes from Sydney Water, possibly amounting to more than \$5 billion over the last 20 years.

Over 20 years ago there was an opportunity to process the sludge in a remote location with a large buffer zone (because of the hazards) about 90ks from Sydney. However, the Water Board rejected this (ICAC enquiry) and chose the cheaper option, Manly....a dense residential location with virtually no buffer zone (only 400 metres). Since then the population density has increased, with the International College of Tourism and University, St. Patricks' housing estate, Quarantine Station resort, Police College, Manly Hospital and St. Paul's College all in close proximity to the Treatment Plant.

An investigation by the Sun Herald in October, 2011 revealed that there have been significant licence breaches at the North Head Sewage Treatment Plant and yet the NSW Government's Office of Environment and Heritage has not prosecuted one of the breaches. The Manly Daily Editorial of 29/10/2011 also stated that "of all the local complaints that find their way to the office at the Daily, the smell coming from North Head is one of the most consistent...But the revelation that potentially toxic mercury was discharged from the facility in 2009/10 goes well beyond an unpleasant stench....There's too much at stake."

This can be rectified with political vision and will!

Notice of Motion Report No. 4 (Cont'd)**RECOMMENDATION**

That the Notice of Motion be submitted for consideration.

ATTACHMENTS

AT- 1	The Sun Herald 23/10/11 "Sydney Water's shame"	2 Pages
AT- 2	Fairlight Survey Group Address to Council 18/01/1994	1 Page
AT- 3	Fairlight Survey Group Address Notes	1 Page
AT- 4	The Sun Herald 23/10/2011 "Look who's polluting:"	1 Page
AT- 5	Copy of letter to Mike Baird MP, Member for Manly by Beverley Trevenen for Clean Ocean Foundation dated 9 October 2012	1 Page
AT- 6	Attachment to letter to Mike Baird, MP Member for Manly dated 9 October 2012 by Beverley Trevenen	6 Pages

OM110213NM_4.DOC

***** End of Notice of Motion Report No. 4 *****

REPORT FROM ENVIRONMENT DIVISION ON NORTH HEAD S.T.P. B.E.46

Ladies and Gentlemen:

This is a brief statement at very short notice.

We would not be here for the fact that there is cause for serious concern. We are suffering health ailments and stress living with closed windows against the dust and gases which the Water Board refers to as odours.

As recently as 6.00 pm yesterday, at Manly Hospital, Hydrogen Sulphide gas was smelt from the plant, confirmed by a male nurse also as not from the hospital and, at 11.10 last night, in hoavy overcast weather, strong phenol deodorant masking hydrogen sulphide gas, produced instant swelling, blocking of nose and headache necessitating shutting windows, in fairlight.

This is a health, technical and funding issue. We are a group acting in the public interest. We ask you the Council as residents and representatives, where does the responsibility lie for our health?

We would like to work with Council on this issue.

(Environment Division)

The technical and wind reports are flawed. The apparent direction on supporting the Water Board and EPA is wrong, not representing the community needs and, in this short time there is not the competent technical expertise to deal with it.

We note Council Environment Division's summary includes references from the EPA only on the dust tests. The Minister for the Environment writes "the E.P.A officers who inspect the Water Board's North Head Plant have not observed material from the sludge stockpile to become airborne".

Both in the May Report and the revised October 28 Report, 1993, "the Water Board staff said on occasions dust was created from the windrows of treated sludge (which Jim Fairlie confirmed August 7th, 1993 at a public group meeting)". Why was this not quoted in Council Environment Division's summary?

With reference to the winds, 10th March, 1993, the Water Board's weather facility was not working. It was based on a forecast. The Sydney/Hobart Yacht Race would depend on Bureau of Meteorology Reports not Water Board Reports.

Sludge Disposal Options Study November, 1992 compares Manly and environs with volcanic areas and eye nasal and cough symptoms in the vicinity of a paper mill. If a paper mill was started locally, an E.I.S would be required and without same would not be allowed to operate.

Appointing another independent body is a delaying tactic. We all know the dust and gases extend beyond the perimeters of the plant and is significantly affecting our environment, requiring an E.I.S.

What is council doing for the residents and their state of health in the short term? 2010 is too far away, ALSO Manly's tourism will be affected and there should be a piping solution in the short term before the Olympics.

The 200 million dollars from the Environmental Levy should help.

We have many statements, in one submitted there is mention of an ear nose and throat specialist informing her that 70% of his patients were from this area and all with breathing and nasal problems, and her quality of life has deteriorated. Others state skin irritations, sore eyes, sore throat and constant congestion, nasal polyps etc.

Why bother with pelletising when money would be saved by immediate piping?

ADVICE: Notes (re: Fairlight & Manly)
There are many of us in Fairlight & Manly whose health is being affected by the works at the North Head Sewage Treatment Plant.

Briefly, incineration ceased and sludge processing commenced 1991. This is deodourizing the H₂S with chemicals, (chlorine & caustic) and, neutralizing the sludge with lime and cement kiln dust.

The health problems suffered & complained about include skin & eye irritations, a frightening-sudden-inability-to-breathe choking & gasping for breath, coughing, nausea; watering eyes & noses, increased mucous production; sore dry throats affecting voice & chest, general malaise and, especially if one leaves the window open at night with wind direction from the plant, sinus headaches & blocked nose. Spot bleeding of nose, & throat through continued clearing, has been reported, plus nasal polyps.

Testimonials state some of these symptoms coincide with odours from the plant, and some appear without noticeable odours, but all are localized. If one leaves the area for holiday or weekend symptoms vanish only to return on return.

The odours include: H₂S, chlorine/ammonia, a sulphur smell, a cheap-bathroom-deodourant-type smell masking H₂S - (the result is a foetid decaying carcase smell and/or decaying fish/fish glue), various chemical odours and a metal smell - we have learned from the EPA this last would be when the incinerator shafts are aired to prevent rusting.

Not all areas are affected, and some more often than others, the winds follow land contours, Fairlight, Eastern Hill and North Steyne appear to be more effected, but the air dispersion is not even and odours can vary from barely detectable to dense concentration - in "pockets", - this can cause onset of gasping-for-breath &/or immediate headache & nausea.

The background and results of our complaints to the EPA & Water Board are covered under the facts published in The Sydney Morning Herald "Let's clear the air" and the N.Beaches W/Ender "Water Bd Sludge Report Unreliable". (available/attached).

The Report concentrated on the dust and ignored the gas-&-chemical-deodourising emissions. Some of the health symptoms suffered are classic reactions from exposure to ozone which was produced at North Head, using ultra violet light to control odour from a ventilation shaft, trialled during 1992. The EPA have informed us ozone is no longer produced. The sludge dust contains fibres & silica.

There is mention in the Report they expect resident reaction when the sludge pelletising processing commences in 1994 for which no E.I.S. (Environmental Impact Statement) has been done, which the EPA state is necessary for the long term.

In the Review of Environmental Factors, Oct 1991, covering North Head Sludge Trial refs: Environmental considerations include there should be no "Harmful effect on Health" & no "adverse odour impacts on local communities". Despite these violations of the Clean Air Act (Section 15A "no scheduled premises shall have an emission of odour pertaining to the handled chemicals beyonds its boundaries"), the EPA state, one of their officers has to be present at the time of the smell for action to be taken. Of course by the time one rings the EPA, and registers the odour, it is fatuous to expect it to be still present by the time an officer reaches the spot! - and one hears no more. So complaining to the EPA is rather like writing to Santa Claus, nil response & one gives up.

In the original tender, Ecore Consortium stated sludge processing would be done in a remote industrial location with a large buffer zone 90k SW of Sydney (Maldon)- (because of the hazards). The Water Board rejected this, (recent ICAC enquiry), and chose the cheaper option Manly - a dense residential location with no buffer zone.

In a North Head Sludge Disposal Options Study 1992 (Appendix A p.1) "There is documented evidence that some pollutants can be harmful when inhaled in high concentrations or at frequent intervals and the recent public concern may be warranted."

The population density within 3 sq.k of the plant is 18,000; 6,000 per sq.k., Fairlight, according to the Water Board, is 5k from the plant.

PROPOSED RESOLUTION:

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Introduction

North Head Sewage Treatment Plant (NHSTP) is located on a headland that forms part of the gateway to Sydney Harbour and our internationally renowned city, in fact, considered one of the top 10 cities in the world. Surprisingly, Sydney is still sending sewage through ocean outfall tunnels to the Tasman Sea. Despite Community action, little change has occurred in this since the 1970s.

Over many years NHSTP, its ocean outfalls, the odours emitted from both the plant and biosolids being transported by trucks have been the subject of a plethora of written plans from the Government, Sydney Water and its predecessor organisation as well as press, radio and, television commentary. Notable amongst the plans, was Sydney Water's WaterPlan 21, released to the public in 1997, that detailed their goals for the future. WaterPlan 21 was used as the cornerstone to promote two large projects in Manly. However, the finished projects, ended-up, far removed from satisfying the goals of WaterPlan 21.

NHSTP was first constructed in 1970s. A health study revealed significant effects on the swimmers' health on Manly's Beaches during high pollution events caused by effluent from NHSTP being released at the cliff face. This led the Government to initiate the construction of the Ocean Outfalls to release the effluent 3.5 km offshore.

Since many people were opposed to releasing untreated effluent to the ocean, People Opposed to Ocean Outfalls (POOO) marches commenced 1985 in Manly protesting against sewage pollution of the ocean. The protests culminated in 1989 in the Midnight Oil "Turn the Tide" concert at Bondi, attracting an estimated 200,000 people. Nevertheless, the ocean outfall at NHSTP was commissioned in 1990.

In December 1989 the Clean Waterways Program was established to promote clean oceans, beaches, harbours, estuaries, rivers and waterways in the State by spending \$7 billion over 20 years within the Water Board region. This sum was to fund work additional to the Board's ongoing work, and was funded by a Special Environment Levy (SEL) of \$80 per annum per Board ratepayer for five years. Most people were supportive of the levy for a cleaner environment.

History of Government Proposals and Community Activity NHSTP

In January 1991 the New South Wales Government and the Water Board released a series of public discussion documents. The discussion document "Towards Clean Beaches and Ocean Waters for Sydney" records:

"A message from the Minister for the Environment and the Chairman of the Sydney Water Board

"In a series of public forums conducted throughout Sydney in 1989, the community gave a very clear message that they wanted clean beaches and ocean waters."

"Given limited resources, it is imperative the community provide input into the decision-making process..."

Another document in the series "Improved Effluent Quality" provided options for improved effluent from Sydney's coastal sewage treatment plants. Extracts from this document are presented below:

"Introduction A report commissioned by the Government and prepared by independent consultants, Camp, Dresser and McKee was released 1989 "...found that the ocean outfalls would achieve an improvement in the levels of beach pollution from sewage effluent. However, the outfalls would not provide the solution to the pollution of the oceans themselves".

"The community gave a very clear message that they wanted, among other things, clean beaches and ocean water."

Where we want to go

"The current standard for ocean water quality was set by the NSW State Pollution Control Commission (SPCC) in 1976. The Water Board is currently meeting this standard with the first submarine ocean outfalls at Malabar and North Head, as well as at plants at Warriewood, Wollongong, Bombo and Shellharbour."

Effluent Quality Goal

“The Water Board has adopted a goal for the quality of the effluent being discharged into the ocean.”

The short and medium term strategy proposed by the Board is designed to facilitate the treatment plants meeting this goal.”

“The goal against which all the treatment processes will be assessed is 50 parts per million for solids and 20 parts per million for grease.”

“The longer term goal is to meet the Environment Protection Authority effluent quality after 1995.”

The series of documents for a public discussion initiated a process of genuine community consultation, presenting options to be assessed, no contracts already signed, and a dollars decision not already made. No funding was allocated for construction after completion of the consultation.

Is the continuing inaction of Governments in improving the treatment standards at its ocean wastewater plants, the result of the sentiments expressed on page 111 of the 1994 “Report of the Joint Select Committee Upon Sydney Water Board”

“The Industry commission Report No. 26, Water Resources and Waste Water disposal, 1992 warned of the dangers of committing operational organisations such as the Water Board to a spiral of rising costs. The Report also warned of an attendant inability to fund future infrastructure improvements to secure critical environmental improvements via the simplistic application of command and control approaches.”

This seems to be contradictory if the “environmental improvements” are indeed “critical”, then what could possibly be meant by “the simplistic application of command and control approaches”

However, it is interesting to note that the next step was a headline in the Sydney Morning Herald January 1995 “Scrap Ocean Outfalls says EPA”. In the article, Professor John Niland the Chairman of the EPA is quoted as saying “We can’t keep treating the oceans the way we have. Unless a body like the EPA starts to speak out we will get five or 10 years down the track and find we are still no better off. The next stage is a complete phase-out of the deep ocean outfalls.”

Unfortunately Professor John Niland was correct! Seventeen long years later there has been no change to licence levels for effluent concentration of sewage solids and grease pollution of the ocean.

The EPA’s Pollution Reduction Program 010 issued to Licence Number 378 North Head STP required Sydney Water to report to the EPA by 31 October 1997, as to how to achieve items 1 and 2 while item 3 to be reported by 30 April 1997.

1 A fifty percentile NFR concentration in the plant effluent of 100 milligrams per litre; and

2 A fifty percentile oil and grease concentration in the plant effluent of less than 25 milligrams per litre; and

3 Sludge removal from the premises which maintains sludge truck numbers at or below a ceiling of 120 truck movements per 5 day week.

By world standards this was not an ambitious enterprise, and, certainly very much less than had been proposed by the NSW Government and the Water Board in the “Improved Effluent Quality Options 1991-1992” documentation.

In November 1997 Mr. Hartcher asked in Parliament why the upgrade to full primary treatment for NHSTP was being delayed until 2002 and the Ministerial response was: “There is no delay. It is going through processes – completion to full primary upgrade will be in 2005’.

Sydney Water stated that PRP010 had been included in Environmental Protection Licence 378 (EPL378) that regulates NHSTP.

On 19 May 1998 Sydney Water noted the detail of their response to PRP010 in a paper presented at a meeting of the SWC Executive:

"A PRP report for North Head was submitted to the EPA in October 1997 for options to achieve effluent NFR 100mg/L and O & G 25 mg/L (ie consistent with the Waterplan 21 outcomes) and to maintain trucking at or below 120 movements per week. The PRP options report identified a preferred liquid treatment option of chemically assisted sedimentation and conventional primary treatment (CAS/CPT). The PRP report also identified a preferred on site process for biosolids management consisting of digestion and drying. Similar PRP's for Malabar and Bondi will be submitted to the EPA in November 98."

It appears that Sydney Water having submitted the options to the EPA in response to PRP10, the matter "died" there, and no further action was taken by the EPA. It is clear that PRP010 no longer forms part of EPL378 but the licence is not annotated as to how or when PRP010 was removed.

Northside Storage Tunnel (NST)

This tunnel was built to keep Sydney Harbour clean, particularly for the 2000 Olympics. In order to alleviate community opposition from the Manly Community to NHSTP being the recipient of another "long pipe solution", Sydney Water promoted the NST to Manly with a sludge pipe that would end the trucking of sludge from NHSTP through the streets of Manly. Sydney Water placed three full-page advertisements in The Manly Daily and made presentations to Manly Council and precincts.

As an indication of the claims made by Sydney Water, the following are extracts from the advertisement The Manly Daily Saturday, November 8, 1997:

"It's part of WaterPlan 21, which is Sydney Water's twenty year \$3 billion program to improve our waterways."

"The design of the tunnel will also let us maximize recycling along its length in the future with a resultant reduction of flow through North Head."

"\$375 million buys a lot more than a tunnel. The rest of the money is being spent on other environmental benefits. These include \$50 million to take biosolids away from North Head, rather than using trucks. As well, recycling pipes for water for water will be installed. The storage tunnel is flexible and can run both ways which is important for increased recycling in the future."

"We want you to appreciate that WaterPlan 21 is an ambitious and responsible plan to bring very real benefits to everybody in Sydney..."

No sludge pipe was integrated in the NST, since it had not been included as an item in the contract that Sydney Water issued for building the tunnel. The reuse water pipe, installed in the NST, had so deteriorated by 2008 that it could not be used and it was too costly to be replaced.

Sydney Water later declared the promotion of the sludge pipe a 'mistake'. On 28 September 2001 at a parliamentary enquiry Mr. Alex Walker, the then CEO of Sydney Water said:

'On 14 May 1999 Sydney Water formally and publically apologised to the Manly community for incorrectly publicizing the intention to install a pipeline to transfer sludge to Camellia for off-site treatment.'

Further, Mr. Walker stated regarding North Head Sewage Treatment Plant:

'The proposed on-site processing would ensure the production of a stable grade A pellitised product that can be transported in a fully enclosed tanker-type truck.'

A step change in thinking about wastewater seems to have occurred at the beginning of 2000 as may be seen from the correspondence discussed below. On 24 Jan 2000 the Managing Director of SWC wrote to the Director General of EPA. The third paragraph reads:

"The Board was advised that at the Strategic Liaison (SLG) meeting of 17 November, 1999 the EPA stated that there were no environmental imperatives that would require Sydney Water to upgrade North Head STP and nor were there likely to be in the next 5 years. Specifically, the EPA does not propose to issue a Pollution Reduction Program for an upgrade on environmental grounds over the next five years. The SLG agreed that any decision to upgrade the STP to improve its reliability is a decision for Sydney Water to make based on the Corporation's Risk Management Strategies."

And then continued with

"The Board of Directors requested that I write to you to obtain written confirmation of the EPA's view regarding the upgrade of North Head STP."

EPA Director General replied 2 February 2000 confirming that the EPA has no current requirements on SWC to upgrade the North Head STP. The last sentence in that letter reads; *"I accept that any decision to upgrade the North Head plant to improve its reliability is a decision for Sydney Water to make based on the Corporation's risk management strategies."*

IN February 2000 Sydney Water Corporation's Board of Directors approved funding for NHSTP Project North Head for upgrade to cost \$179m $\pm$ 25% which included a reduction in the concentration of solids and oil and grease in the effluent.

This was followed by a presentation to the Board of Sydney Water at its meeting of 11 April 2001 at which it was confirmed that:

'In February 2000 the Board approved in principle the upgrade of the major ocean plants to full primary treatment.' (Interface with Upgrade of Major Ocean Plants)

In June 2001, the Sydney Water Board of Directors approved a Community Consultation Policy that would provide the foundations for the approach to communication with the community on Project North Head, extract from Consultation Policy:

"Sydney Water provides products and services essential to the communities it serves. Community consultation provides Sydney Water with the opportunity to understand and incorporate community views and preferences into the decision-making process. The views and preferences of the community are one of several important factors considered by Sydney Water in the decision-making process. Other factors include environmental, health, economic, technical, operational and safety considerations."

In November 2001 Project North Head (PNH) community consultation commenced. The catchphrase for the PNH consultation was "no surprises".

On reviewing the notes of the meetings and data provided for assessment for Project North Head for members of the MKSF between November 2001 and 25 March 2003, it can be seen that MKSF members demonstrated their commitment to community and environment with attendance at meetings despite recognising that it was an information forum for decisions already made by Sydney Water for an upgrade to NHSTP within an already allocated budget. There was a feeling amongst MKSF members that they were being shepherded, participating in a mix and match game. One member angrily declared that they were there to select the colour of any paint required.

The PNH 'consultation solutions' were based on the premise that the community were prepared to have sewage solids, oil and grease pollution to the ocean continued. This was shown to be wrong by a statement signed by eight members of MKSF that there could be no consensus based on the options provided failing to achieve sustainability objectives, given population growth, the timelines under consideration. Four members of MKSF presented a Resolution that called on Sydney Water to:

- 1. Embark upon a preliminary study that determines when NHSTP will become partially, or fully redundant.*
- 2. Describe an alternative viable scheme(s) that could supersede current wastewater disposal methods at North Head, as requested by key stakeholders at your recent workshops.*
- 3. Give the potential timeframe for implementing a replacement scheme*

Members of Manly Key Stakeholders' Forum (MKSF) were advised by letter dated 9 October 2002, Ref:831/486/OC 086 that the final workshop on Project Objectives would be held on 22 October 2002, however, the meetings continued until March 2003.

A consultant for IPART who undertook a Review between October and December 2002 had raised the issue with EPA *"... that Sydney Water intends to upgrade all the ocean outfall sewage treatment plants by 2010 which is outside the capital program that they defined. The North Head STP is identified for upgrading to start within the defined program. This is said to be in reaction to increasing grease loads The EPA says that upgrading the ocean outfall plants is not a priority."* (EPA representing the Government's environmental priorities).

IPART's Determination No 4 of May 2003 states:

"All above ground asset renewal capital expenditure was allowed except for: \$16 million for an upgrade at the North Head sewerage treatment plant, as this was not in line with the priorities set by the Environmental Protection Authority of NSW."

"In evaluating the appropriateness of environment-related capital expenditure projects, the Tribunal relies heavily on advice from the EPA (representing the Government's environmental priorities)"

Sydney Water argued the consultant misinterpreted the prime drivers for NHSTP upgrade.

"Sydney Water explained that the drivers for the project are partly to ensure the maintenance of effluent standards under the existing licence, and to improve the reliability of existing equipment systems." Further, *"WaterPlan 21 is a significant driver also"*.

Despite the overwhelming support from the Manly Key Stake-Holders' Forum that the reduction in solids pollution to the ocean should be greater than the options presented in the PNH, IPART questioned community support for the upgrading at North Head STP.

As a result of IPART Determination No 4 of May 2003 Sydney Water sought approval from its Board of Directors at a meeting in November 2003, *"for works to include reliability, renewal, process improvement, biosolids management and a water reuse facility at North Head Sewage Treatment Plant (STP) in the price submission to the Independent Pricing and Regulatory Tribunal (IPART) at an estimated cost of \$106 million."*: The following were presented 19 November 2003 in a paper for the Sydney Water Corporation's Board:

'... there will be 13% growth within the catchment over the next 20 years'; Page 1

'Project North Head was targeted at increasing solids capture from the current 30%, to 60%.' Page 1

'The process upgrade may result in an increase in oil and grease captured, including a solids capture increase, from the current 30%, to approximately 35% capture.' Page 11

Extracts from Sydney Water's "Client Needs Specification for North Head STP Performance and Reliability Project Concept Design"

"2.1 Objective"

The overall objective of the PAR project is to provide North Head STP with the appropriate process capability, reliability and operability to ensure compliance with the current EPA licence requirements with respect to effluent quality up to the year 2023".

As mentioned above, it was not intended that in the long term the effect of PAR would be an increase in the capture rate, because the licence was not to be changed till at least 2023. The Project was therefore constructed on the assumption of a 13% growth in the inflow to the plant, but no change to the effluent pollution levels. The current licence concentration pollution levels for TSS, oil and grease have existed since 1976 – 36 years to date.

Since odours have been a perennial problem at NHSTP, the PAR Project 'Client Needs Specification' included section '5.3 Task 3 Odour Mitigation' with

'5.3.3 Project Scope'

The scope of works for odour mitigation shall include but shall not be limited to:

Based on the capital works recommended by Sydney Water's Air Quality & Atmospheric Monitoring Unit and agreed by the IPT, provide a concept design for odour mitigation of the operation of North Head STP following implementation of PAR. Provide capital and operating and maintenance costs for the odour mitigation components of the PAR project. 'Page 17

Whilst the digesters and the biosolid storage facilities at NHSTP were being designed, the Community Consultative Group members requested that contingency measures should be included in the design to avoid offensive odours that at that time were being experienced by community from Malabar STP. The possibility of offensive odours being produced by the biosolids from the digesters was forcefully denied by the representatives of Sydney Water. Unfortunately, the experience with the new biosolids facility, which became operational in September 2007, indicates otherwise and is supported by an extract from FOI document SW Ref KH004130 dated 01.08.08

‘However, the biosolids produced by the new digesters are more odorous than when Thiess Services operated their plant.’

and

‘From December 2007, Sydney Water has required all trucks transporting biosolids from North Head STP to use special tarpaulin covers that are very effective in preventing odours from the biosolids escaping.’

As well as

‘Additionally Treatment Operations, working in conjunction with Asset Planning and Sustainability, has initiated a research and development project to investigate methods to reduce the odour levels of biosolids from North Head STP.’

It appears that the writer of the PAR ‘Client Needs Specification’ was aware that odours were likely to be problematic since the two dot point quoted above and repeated here for emphasis “
“ odour mitigation of the operation of North Head STP following implementation of PAR.
Provide capital and operating and maintenance costs for the odour mitigation components of the PAR project’ ,
indicate that odour problems were expected to occur!

It is noteworthy that the PAR “Client Needs Specification” Section “3.3 Compatibility with Project North Head” states

‘The full primary upgrade as identified by Project North Head is the blue print for the long term development of the plant. The concept design for the PAR project will be compatible with the provision of the full primary equivalent upgrade at a later date. The concept design will identify and accommodate a two stage approach to the provision of the full primary upgrade.’ Page 7

Finally it was proposed in section ‘5.7.4 Proposal’ that:

‘North Head STP is to be progressively upgraded, over time, to achieve full primary sedimentation.’

And

‘In the full primary treatment upgrade of North Head STP (to be carried out beyond 2020).

‘The Options Report of Project North Head contains the proposed general arrangement for the full upgrade.’

The performance outcomes in Sydney Water’s proposed upgrade to full primary treatment at NHSTP after 2020 were rejected in the 2003 PNH consultation.

In response to a request for information made under the GIPA Act regarding the claim that EPA advised Sydney Water to proceed with PARR on the premise that changes to effluent concentration levels was unlikely before 2023 the Office of Environment & Heritage replied “*we have been unable to locate a record that refers to 2023.*”

SWC has acknowledged that this is correct. However, SWC still claims that the PARR project was designed to meet the current pollution concentration loads until 2023. How this could be done without setting an effluent concentration is not clear, so *ipso facto* whether the EPA has or has not set the licence conditions to persist till 2023.

EPL378’s Assessable Pollutant Load Limit (kg) specifies:

Total Suspended Solids	35010800kg (35,000 tonnes)
BOD	35010800kg (35,000 tonnes)
Oil and Grease	5569900kg (5,500 tonnes)

REPORT FROM ENVIRONMENT DIVISION ON NORTH HEAD S.T.P. B.E.46

Ladies and Gentlemen:

This is a brief statement at very short notice.

We would not be here for the fact that there is cause for serious concern. We are suffering health ailments and stress living with closed windows against the dust and gases which the Water Board refers to as odours.

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This is a health, technical and funding issue. We are a group acting in the public interest. We ask you the Council as residents and representatives, where does the responsibility lie for our health?

We would like to work with Council on this issue.

The technical and wind reports are flawed. The apparent *(Environment Division)* direction on supporting the Water Board and EPA is wrong, not representing the community needs and, in this short time there is not the competent technical expertise to deal with it.

We note Council Environment Division's summary includes references from the EPA only on the dust tests. The Minister for the Environment writes "the E.P.A officers who inspect the Water Board's North Head Plant have not observed material from the sludge stockpile to become airborne".

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Sludge Disposal Options Study November, 1992 compares Manly and environs with volcanic areas and eye nasal and cough symptoms in the vicinity of a paper mill. If a paper mill was started locally, an E.I.S would be required and without same would not be allowed to operate.

Appointing another independent body is a delaying tactic. We all know the dust and gases extend beyond the perimeters of the plant and is significantly affecting our environment, requiring an E.I.S.

What is council doing for the residents and their state of health in the short term? 2010 is too far away, ALSO Manly's tourism will be affected and there should be a piping solution in the short term before the Olympics.

The 200 million dollars from the Environmental Levy should help.

We have many statements, in one submitted there is mention of an ear nose and throat specialist informing her that 70% of his patients were from this area and all with breathing and nasal problems, and her quality of life has deteriorated. Others state skin irritations, sore eyes, sore throat and constant congestion, nasal polyps etc.

Why bother with pelletising when money would be saved by immediate piping?

ADDITIONAL Notes
There are many of us in Fairlight & Manly whose health is being affected by the works at the North Head Sewage Treatment Plant.

Briefly, incineration ceased and sludge processing commenced 1991. This is deodourizing the H₂S with chemicals, (chlorine & caustic) and, neutralizing the sludge with lime and cement kiln dust.

The health problems suffered & complained about include skin & eye irritations, a frightening-sudden-inability-to-breathe choking & gasping for breath, coughing, nausea; watering eyes & noses, increased mucous production; sore dry throats effecting voice & chest, general malaise and, especially if one leaves the window open at night with wind direction from the plant, sinus headaches & blocked nose. Spot bleeding of nose, & throat through continued clearing, has been reported, plus nasal polyps.

Testimonials state some of these symptoms coincide with odours from the plant, and some appear without noticeable odours, but all are localized. If one leaves the area for holiday or weekend symptoms vanish only to return on return.

The odours include: H₂S, chlorine/ammonia, a sulphur smell, a cheap-bathroom-deodourant-type smell masking H₂S - (the result is a foetid decaying carcass smell and/or decaying fish/fish glue), various chemical odours and a metal smell - we have learned from the EPA this last would be when the incinerator shafts are aired to prevent rusting.

Not all areas are affected, and some more often than others, the winds follow land contours, Fairlight, Eastern Hill and North Steyne appear to be more effected, but the air dispersion is not even and odours can vary from barely detectable to dense concentration - in "pockets", - this can cause onset of gasping-for-breath &/or immediate headache & nausea.

The background and results of our complaints to the EPA & Water Board are covered under the facts published in The Sydney Morning Herald "Let's clear the air" and the N.Beaches W/Ender "Water Bd Sludge Report Unreliable". (available/attached).

The Report concentrated on the dust and ignored the gas-&-chemical-deodourising emissions. Some of the health symptoms suffered are classic reactions from exposure to ozone which was produced at North Head, using ultra violet light to control odour from a ventilation shaft, trialled during 1992. The EPA have informed us ozone is no longer produced. The sludge dust contains fibres & silica.

There is mention in the Report they expect resident reaction when the sludge pelletising processing commences in 1994 for which no E.I.S. (Environmental Impact Statement) has been done, which the EPA state is necessary for the long term.

In the Review of Environmental Factors, Oct 1991, covering North Head Sludge Trial refs: Environmental considerations include there should be no "Harmful effect on Health"; & no "adverse odour impacts on local communities". Despite these violations of the Clean Air Act (Section 15A "no scheduled premises shall have an emission of odour pertaining to the handled chemicals beyonds its boundaries"), the EPA state, one of their officers has to be present at the time of the smell for action to be taken. Of course by the time one rings the EPA, and registers the odour, it is fatuous to expect it to be still present by the time an officer reaches the spot! - and one hears no more. So complaining to the EPA is rather like writing to Santa Claus, nil response & one gives up.

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In a North Head Sludge Disposal Options Study 1992 (Appendix A p.1) "There is documented evidence that some pollutants can be harmful when inhaled in high concentrations or at frequent intervals and the recent public concern may be warranted."

The population density within 3 sq.k of the plant is 18,000; 6,000 per sq.k., Fairlight, according to the Water Board, is 5k from the plant.

PROPOSED RESOLUTION:

p.t.o.

REPORT FROM ENVIRONMENT DIVISION ON NORTH HEAD S.T.P. B.E.46

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PROPOSED RESOLUTION:

p.t.o.



TO: Manly Community Environment Committee
MEETING DATE: 20 February, 2013
AUTHOR: Judy Reizes, Community Environment Committee Co-ordinator
SUBJECT: MEC and Current Local Environmental Issues Report

Manly Environment Centre Report

The MEC has worked on the following initiatives:-

The 19th OCEAN CARE DAY SUNDAY, 2nd DECEMBER, 2012 – theme “Cabbage Tree Bay – See Under the Sea” to celebrate the establishment of the Friends of Cabbage Tree Bay Volunteers. Scientist Belinda Curley talked about her research project on Dusky Whalers in CTB as part of the opening proceedings.

MC was General Manager Henry Wong and Cllr Jean Hay, Mayor of Manly officially opened the event. Our International Interns working with 3 of our Volunteers who are qualified in Marine Biology and prepared and ran the MEC Eco Lab that focused on the biodiversity of Cabbage Tree Bay. The Penguin Pavilion was also a major focus with school children’s penguin artwork from Taronga Zoo Project Penguin. Taronga Zoomobile always a great hit with the children.

- 45 Stallholders including Manly Council’s CEP and Bushcare, 35 NGO’s and Government bodies.
- 13 Artists.
- 28 Volunteers.
- 34 people signed up to attend an information session for ‘Friends of Cabbage Tree Bay’
- Manly Mayor Jean Hay :-
 - Launched Friends of Cabbage Tree Bay Volunteers.
 - Presented the prizes for Project Penguin Art Competition for Secondary Students to Ellie Nicholls from Mackellar Girls High School.
 - Winner of the Children’s Sticker Competition to Eliza Curll from Manly Village Public School. Runner up Zoe Mathieson from Middle Harbour Public School.
- Community feedback as the most successful Ocean Care Day.

INTERNSHIPS AND VOLUNTEERS:

December - We would like to thank our 2012 volunteers for all their efforts throughout 2012 which was a very full and successful year and we celebrated with a wonderful end of year party at The Manly Art Gallery.

January - Our Intern from South Korea Evelyn completed her 4 month Internship in January and our new South Korean Intern Yuree commenced her 3 months Internship. We also have some new volunteers who have joined us this year. We continue to receive more Intern and Volunteer applications every month.

MEETINGS:

Meetings/Visits/events attended in December included:-

Weekly Meetings with Events Team in the lead up to Ocean Care Day

8 & 9 December – First weekend for ‘Friends of Cabbage Tree Bay’ volunteers.

3 January – Meeting with Sea Life Sanctuary – venue for MEC Eco Awards.

7 January – Robynne Millward organised Bike Life Festival Meeting - A collaborative working group across Council met including Council Traffic staff, Community Environmental Projects –

(Retro Ride), Sustainable Transport Committee, Community Environment Committee, Manly Youth Council, Events, Community Safety Officer and Manly Environment Centre.

8 January – Meeting of 'Friends of Cabbage Tree Bay' Working Group and Volunteers.

10 January – Meeting with potential Korean Intern.

15 January – Organising World Wetlands Day walk with Louise Egerton at Manly Lagoon.

17 January – RM Guringai Festival Meeting with Manly Community Centre and Warringah Council Art and Cultural Development.

22 January – RM Video Conferencing Meeting.

29 January - RM Guringai Festival Meeting Manly Community Centre.

VISITS:

21 January – Visit to MEC by delegation from Chongqing, Sichuan, China of Senior staff from Environmental Protection Authority. They were welcomed by Deputy GM Stephen Clements Robynne Millward gave a short talk and tour of the MEC and Manly Food Co-operative. The 2 hour tour included Council sustainable projects including solar panels, waste, bubblers, litter guards and sustainable water uses presented by Council Staff. This is our third EPA delegation from mainland China.

EVENTS/LAUNCHES:

19 December – Volunteer Christmas Party. A very successful Volunteer End of Year Party was held at the Manly Art Gallery, attended by 55 volunteers.

UPCOMING EVENTS

World Wetlands Day - 2 February – We were planning to have a 2 hour guided walk of the Manly Lagoon by acclaimed author Louise Egerton, to celebrate World Wetlands Day, but because of bad weather this will have to be rescheduled to 23 February.

Friends of Cabbage Tree Bay Volunteers - Progress with FoCTB Volunteers – next intake of Volunteers Training Day Sat 9 Feb 9am – 11.30am Sands Café, Shelly Beach.

MEC Eco Awards – Nominations are now being received for the Annual MEC Eco Awards. The nominations close on 28 February. The gala presentation night will be held at Manly Sea Life Sanctuary on 6 March, 2013.

RECOMMENDATION:

Report be received and noted.

Judy Reizes
Manly Community Environment Committee Co-ordinator
7 February, 2013