

## **Environmental Policies - Scrutiny review**

### **Terms of reference**

1. To consider the identification and implementation of environmental strategy and policy since the publication of Jersey into the Millennium: A Sustainable Future;
2. To question the Council of Ministers, and in particular the Minister for Planning and Environment, on planned strategy and policy in respect of environmental matters; and
3. To consider the draft Strategic Plan in relation to environmental strategy and policy.

### **Response:**

In the light of the impending construction of Building 4 of the So JDC's proposed International Finance Centre to replace the car park.(if enough tenants sign pre-let agreements) Save Our Shoreline Jersey re-examines what lies beneath Jersey's Waterfront, the gateway to our Island.

A number of Waterfront projects have been approved and/ or built in recent years, and many more are in the Planning pipeline. Little has been said thus far about the remediation necessary for each one during the excavation of the sites, especially as most now have plans for several levels of underground car parking.

It is to Dandara's credit that following our concerns about sea penetration of Castle Quay, they worked with us during the planning process of Castle Quay 2 which has recently been approved. The compromise restricted the basement level to one so excavation will not go down to mean high water sea level which is where problems start.

The Finance Quarter development, however, is a new and huge beast in its extent and design and added to the existing and already approved but unbuilt buildings such as the Zephyrus Development, will cause a huge headache. The old Victorian sea wall on the boundary of Harbour Reach (building 4) serves to remind us where the beach once was, below 9 - 10.5 metres of largely contaminated fill.

All the buildings will need deep excavation work on areas that have previously been identified in two independent reports, the WRc Environmental Resources Management Report of 1999, and the Arup Rothwell Consulting Engineers Report of 2000. (Maps attached) The consultants agreed that following the practice of dumping of combined incinerator ash into our land reclamation sites from 1979 until 1995, the Waterfront is riddled with pockets of ash, asbestos and other toxic materials. The whole area can be classed as a collection of toxic waste dumps which are porous and face powerful hydropneumatic pressures from our huge tides. As the tide rises, seawater is forced into the underlying areas and mixes with the contaminated groundwater which is flowing slowly seawards.

SOSJ know from experience (such as documented events at the Energy from Waste Plant excavation) that the sea can indeed come 'up and under', even if piling is used, will mix with contaminants and the resulting leachate, which contain high concentrations of heavy metals and other pollutants, will flow to sea, which are 'controlled waters', (as in fact is the ground water table below St. Helier).

It is not just the removal of the contaminated material that is the problem here. In fact the Wrc report of 1999 states: "The rate of groundwater migration estimated to be 21 metres per year would tend to indicate that a plume of contaminated waters could take up to 20 years to migrate from the oldest areas of ash disposal to the current sea wall". Coincidentally SOSJ released their own report in March of 1999 which mirrored Wrc's concerns about marine pollution. Given that nearly 14 years have already passed since the Wrc Environmental Management Report and Arup Rothwell reports, we are now approaching the highest risk period, and further excavation can only serve to disturb the forces underground that will accelerate this process. Ironically the soon to be renovated West Park Bathing Pool may be off bounds if the process speeds up.

The Wrc report (Nov 1995) show that in the Esplanade car park area, between 1987 - 1995, As was segregated into layers or 'graves'. The levels vary from +6.2m, to +7.0m OD. A smaller area to the east is show as ash mixed with inert fill during tipping. (See map attached)

The Waterfront is in reality a huge toxic dump. All anyone can do is to remediate as much as possible when construction starts. Our observations in the past have been that site managers have been allowed to decide 'on the hoof' which loads contain incinerator ash, which contain asbestos coated material, and which seem inert. All materials are then carted off by lorries to various disposal sites at La Collette. Asbestos will be for a time available to the air, and a recent assurance Transport and Technical Services that 'as soon as it is noticed it will be covered with a tarpaulin' is not good enough given that the area is heavily populated, and it can only take a few fibres of asbestos to be inhaled to cause often lethal disease in later years.

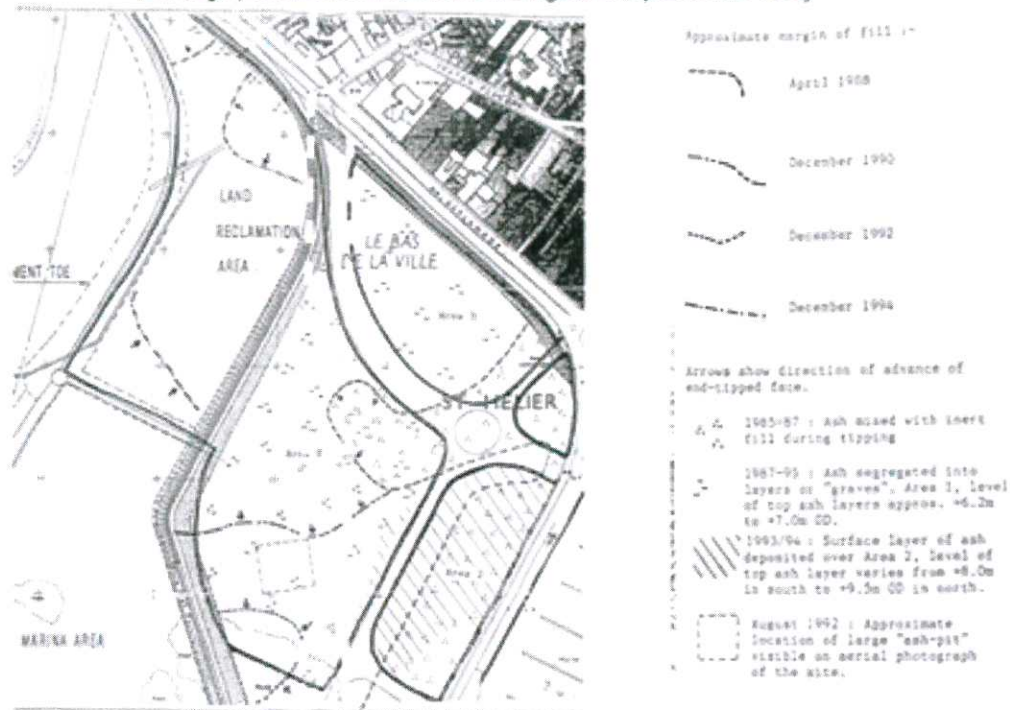
We have raised the issue with the various Departments and are looking at more environmentally friendly disposal methods. But the sheer volume of material and its removal will alone cause deep disruption to the already mobile ground and sea waters and the effects on the motility and disturbance of the toxins are unknown. Dr. Mike Romeril, Environmental Adviser to the States of Jersey, estimated that in 1988 alone, over 17,000 tonnes of combined incinerator ash was dumped, which contained 440kg cadmium, 4.8kg mercury and 64,000 kg lead. This process went on for many years and volumes increased. So we see problems creating huge deep excavations in what is actually a contaminated marine environment. And there are further problems in disposing of the excavated material much of which must be deemed contaminated.

SOSJ feel that this situation cannot be lightly signed off by Planning and Environment without a full workable and robust remediation method in place and we ask that this is initiated without delay. JDC seem to be playing down the possible problems,

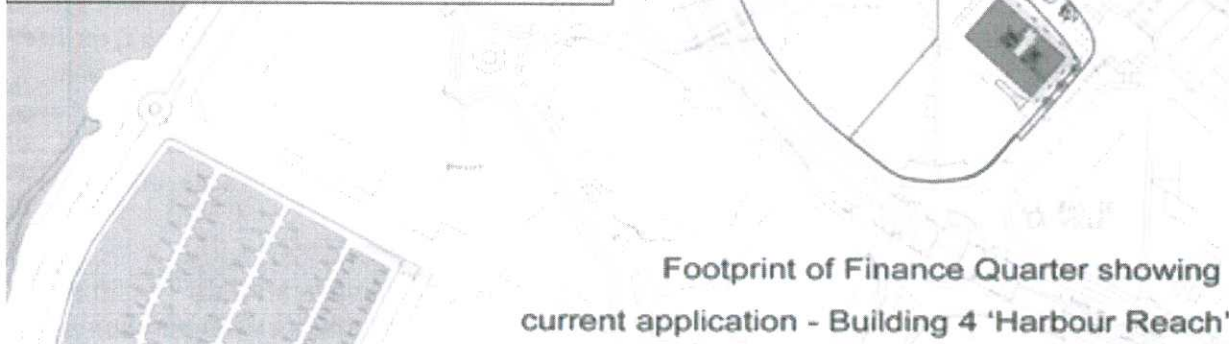
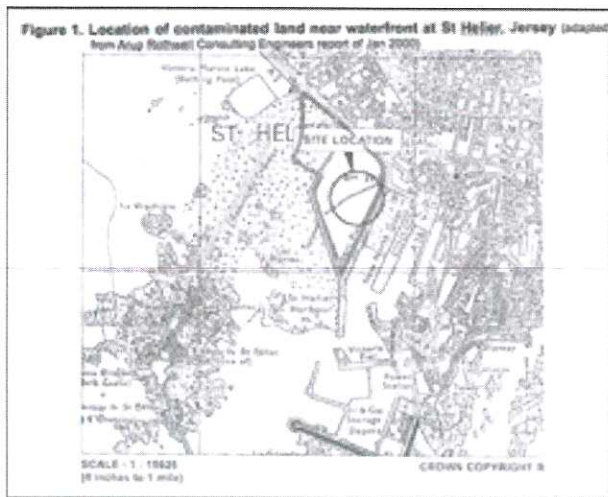
**NOTE:**

The Bellozanne municipal waste incinerator was built in 1972. Ash from incineration in the period from 1972 to mid 1980s was stockpiled near the site of the incinerator. From May 1985, ash from the incinerator was disposed at Albert Pier Reclamation Site. Initially, ash was tipped together with inert fill material in the area behind the Albert Pier wall. From September 1987, the method of ash disposal was changed, in order to restrict it to pits above mean high tide level.

**Figure 2. Location of incinerator ash disposal sites near waterfront at St Helier, Jersey. (from WRc Environmental Management report of Nov 1995)**



The average height of the fill at the site is 9 to 10.5 m AOD :



Footprint of Finance Quarter showing current application - Building 4 'Harbour Reach'

When the reclaimed site was filled, incinerator ash from Bellozanne incinerator started being disposed at the La Collette landfill outside St Helier. The Waterfront Enterprise Board was established to develop the reclaimed site on the waterfront at St Helier, and they commissioned an assessment of the reclaimed land to WRC Environmental Management in November 1995. Several waterfront developments were planned, including housing and a leisure centre. The Waterfront Enterprise Board then commissioned a geotechnical report on the Albert Pier Housing to Arup Rothwell Consulting Engineers, this was published in December 2000, and construction work started the following year. A public health opinion on the possible health hazards of incinerator ash on the site was requested to the Health & Social Service Committee in mid 2000.

To illustrate the fact that environmental policies do not currently protect either the health of the Islanders or the environment I have included the recent planning objections that I have felt compelled to write.

**Objection to the planning application for No. 1 Jersey International Financial Centre, The Esplanade, St Helier - P/2013/0993**

**Date: 9th August 2013**

**This objection is to be read in conjunction with Appendix 1**

I find this whole application to be completely inadequate. Despite conflicting information and overall poor standard of what information is included, I will focus on what are the most concerning environmental factors.

***Environmental assessment of ground conditions (July 2013):***

From the executive summary:

Pg 6 ground conditions state that the site would be classified as a brownfield site of made ground with boulders etc. It also states the use of barrier pipes. Could the applicant explain the need for/ use of them.

It also states that only zinc has been found in elevated quantities. A fact I find highly surprising as there has been no testing commissioned for this application. Knowing that this area of reclaimed land was constructed prior to 1995, one could find literally anything on site, including asbestos fibres as there were no records kept of disposal areas of incinerator ash etc.

In relation to controlled waters previous (completely outdated) testing shows elevated levels of copper, petroleum hydrocarbons and benzo(a)pyrene.

I see no risk assessments completed on any of the potential hazardous materials. This in itself is unusual as in the conceptual model it notes inter alia "the risk to construction personnel through direct contact, ingestion and inhalation with contaminated soil".

In accordance with good practice there should now be a thorough investigation of both the ground conditions and of ground water on site. This should be carried out before any

permission is granted. Depending on the results it may be that any remediation of the site prior to construction would make the project financially unviable, especially in the case of an underground 3 level basement public car park.

Also I see no adequate assessment of the radon gas present.

Pg 7 Here it is stated that standard groundwork methods will be used to minimise dust and mud on public highways. This is not acceptable. Given the nature of the made ground, potentially asbestos fibres amongst other pollutants may be released and put the public's health at risk.

Pg 8 Within the objectives and brief it states this Preliminary Environmental Assessment is of the ground conditions for buildings 1 and 2 and the underground public car park. However the most recent ground investigation was completed in 2008, some 5 years ago. With this being just a desk study, the information given must not be regarded as a true reflection of ground conditions as they are today. This application should be placed on hold until proper investigations are conducted.

***Environmental assessment of ground conditions (July 2013):***

Of the 6 reports used dated 1995, 1999, 2004 and 3 in 2008, it is stated that the information contained within the 3 reports of 2008 can not be relied upon. If put another way, it actually means that there has been no adequate testing of the ground conditions.

In the WRc 1995 only one borehole was drilled but no chemical testing completed. In the Amplus 1999 report also no chemical testing was completed. The WRc 2004 makes apparent that there has only ever been one borehole test within the site boundary (WRc 1995). In the Amplus 2008 and Faber Maunsell 2008 reports, the desk study completed by Faber Maunsell did not have the full copies of reports used.

As previously stated none of this data can be relied upon as no licence is held to use the information. This raises the question of how can Waterman include results of previous ground conditions that were not available to them.

On pg 4 it states that there was an obstruction encountered on the north-east of the site - the old sea wall.

2.2 Ground conditions here differ to the executive summary - see nature of made ground.

Pg 6/7 states that the obstructions believed to be part of the old sea wall are beneath buildings 1 and 2 and the underground carpark.

Pg 7 states there is no record of tidal flow under the site. This is surprising as I have viewed such data which was provided by another applicant on a different application. Dandara were able to show me the tidal flow patterns beneath the ground of their site.

I am surprised that only lead has been identified as a possible risk to human health, and copper as a risk to controlled waters. My surprise is exacerbated by the fact there was no ground water sampling completed in the Amplus report 2008.

### ***Environmental Impact Statement Addendum - Revised July 2013***

The revision does not appear to address any flaws or omissions that were present in the first version.

The chapter concerning ground conditions state that there is no change to previous assessments.

Perhaps the applicant can show us the assessments they have commissioned themselves for this large scale application.

At this stage I do not intend to indicate all the shortcomings of this application and it should not be taken as indicative that there are not other environmental concerns. I am making a great assumption when I hope that the application will be scrutinised by the planning department or will it regarded as a fait accompli. When asking a planning officer why in the EIS of July the applicant stated they had planning permission for building 4 (which had not officially been passed at that time); my response was inter alia "the Minister had made a resolution in April, to approve subject to the completion of the Planning Obligation, so their assumption was not wildly inaccurate."

### **Additional Information:**

#### **Ground Works**

The ground that will be excavated used to be the beach where the then Public Services would randomly dump Bellozanne ash, both bottom and fly ash, and these areas have been mapped by consultants Arup. Our concerns that the ground water migration as forecast in 1995 by the Wrc Management Report will be speeded up and the excavation of more than one basement level will cause hydropneumatic forces from the sea (remember this was once the beach) to force huge pressures under the site and up into the excavation as happened at Castle Quay 1 and more particularly during the construction of the incinerator, whereby at one point the bunker was (in the words of one independent consultant...) in danger of washing away. This excavation also caused other problems foreseen by SOS but ignored by the clients TTS and the contractors CSBC. Fichtner's Project Manager's Consultant warning were ignored when he realised the consequences of what the contractors were doing to get rid of the polluted leachate in the pit (they were pumping it straight to sea in contravention of the contract and the law. This was his view and shared by the Regulator Willie Peggie (now Director of Environment) We attach one of Mr Peggie's letters to the Contractor as evidence of this.

The Project Manager eventually left as his job was made untenable as he was seen as a whistle blower. He maintains that he offered to give evidence to the Regulator under oath but was refused. We have still too have a satisfactory explanation as to why no action was taken despite the overwhelming evidence. We can only assume that it was deemed to be 'not in the public interest'. Hence our fears about the potential environmental fallout of this huge States project.

The problems here could be repeated at the Esplanade site: The Client is the SoJDC; at EfW the client was TTS. Both clients are in fact the States, thus cannot be seen to be impartial. Senator Cohen recognised that this situation was not tenable as a 'poacher turned gamekeeper' problem could potentially arise, and thus it transpired at the incinerator construction site no action was taken despite the huge amount of evidence that we gathered and the Witness statement that we received at the time. [www.jerseyinperil.com/witnessreport.html](http://www.jerseyinperil.com/witnessreport.html)

Senator Cohen agreed and insisted that in future developments of this nature (Zephyrus and Castle Quay 2) the CEMP must involve the use of a third party independent consultant to oversee the safe removal and disposal of toxic material. SOS had noted that asbestos loaded material was observed to be transported in a random fashion from early sites and arbitrarily dumped at various points at La Collette depending on the site manager's judgement as to what it contained. Sometimes wheels were washed sometimes not, sometimes material was dumped inside the ash compound directly on the rubble wall. SOS photographed contaminated material blowing out to sea in a cloud of dust on several occasions.

Our evidence was compelling and the Environmental Scrutiny Panel of the time agreed that in future this must not happen again. But we note that regarding Building 4, this specific condition was not applied and we regret not going further into it. Being tied up with asbestos containers at La Collette and other issues (in particular the Georgian Sea Wall) and being self funded we do not have the enormous resources that the SoJDC obviously have.

We would like to append as evidence of what we say here of the situation that can happen in what is actually a marine environment by way of our report: 'What Really Happened at EfW.' The link to our report on this is here: <http://www.jerseyinperil.com/special.html>

Going deeper than one level (a level agreed by previous Environment Minister Freddie Cohen and team with us regrading the Zephyrus and Castle Quay 2 developments) will cause other problems.

## **APPENDIX 1**

### **Objection to the planning application for No. 4 Jersey International Financial Centre, The Esplanade, St Helier - P/2012/1141**

#### **Concerns and reasons for objection: No Asbestos Testing**

This proposed Financial Centre is to be constructed upon reclaimed land, which at best could only be described as hazardous. The proposal sees the excavation under two of the buildings of Phase 2 going down far enough to construct a three level basement car park. Although this application is for building 4, it can not be seen as a separate entity to the scheme as a whole.

It is confirmed within the application that no asbestos testing has been undertaken with regard to the fill materials that are present there today. This area of reclaimed land is known to have various pockets of asbestos dumped there during the reclamation of this area. It is a blatant disregard for the health of not only the workers that will be employed on this project but also to the residents surrounding this development and daily users of the area.

***“This material is a major hazard to health and no concentration of asbestos dust may be presumed safe.”***

*Source: Lancet, March 1995*

Asbestos is the collective term for a group of magnesium silicate materials. This fibrous mineral has an excellent resistance to attack from fire, heat and chemicals. It is commonly found in building products, brake linings, gaskets and roofing materials.

There are 3 main forms of asbestos:

- Blue asbestos or crocidolite which is so dangerous that its use is now virtually banned in the UK. It is still a substantial threat to any demolition workers and is still present in old buildings, boiler plant and ships.
- White asbestos or chrysotile
- Brown asbestos or amosite

The other varieties are tremolite, anthophyllite and actinolite however they have minor commercial importance.



## **What are the health hazards of exposure to asbestos?**

Asbestos is well recognized as a health hazard. Asbestos fibers associated with these health risks are too small to be seen with the naked eye.

People may be exposed to asbestos in their workplace, their communities, or their homes. If products containing asbestos are disturbed, the tiny asbestos fibers are released into the air. When asbestos fibers are breathed in, they may get trapped in the lungs and remain there for a long time. Over time, these fibers can accumulate and cause scarring and inflammation which can affect breathing and lead to serious health problems.

This buildup of scar-like tissue in the lungs is called asbestosis and can result in loss of lung function that often progresses to disability and death.

Asbestosis (an inflammatory condition affecting the lungs that can cause shortness of breath, coughing, and permanent lung damage) and other nonmalignant lung and pleural disorders, including pleural plaques (changes in the membranes surrounding the lung), pleural thickening, and benign pleural effusions (abnormal collections of fluid between the thin layers of tissue lining the lungs and the wall of the chest cavity).

Asbestosis may result from exposures as short as six weeks in heavy dust concentrations.

Asbestos also causes cancer of the lung and other diseases such as mesothelioma of the pleura which is a fatal malignant tumor of the membrane lining the cavity of the lung or stomach.

Brief exposure to blue asbestos can manifest itself later in life as mesothelioma. There also many people who are now being diagnosed with asbestos-related disease who have never worked in asbestos-handling industries. Some were exposed to asbestos fibers as children, because their fathers worked in heavy industry, construction or as vehicle mechanics and brought asbestos home on their work clothes.

It's crucial, that people be protected from asbestos exposed during the digging for new construction developments.

Studies have shown that exposure to asbestos may increase the risk of lung cancer and mesothelioma (a relatively rare cancer of the thin membranes that line the chest and abdomen. Although rare, mesothelioma is the most common form of cancer associated with asbestos exposure. In addition to lung cancer and mesothelioma, some studies have suggested an association between asbestos exposure to gastrointestinal and colorectal cancers, as well as an elevated risk for cancers of the throat, kidney, esophagus, and gallbladder.

## **What factors affect the risk of developing an asbestos-related disease?**

Several factors can help to determine how asbestos exposure affects an individual, including:

- Dose (how much asbestos an individual was exposed to).
- Duration (how long an individual was exposed).
- Size, shape, and chemical makeup of the asbestos fibers.
- Source of the exposure.
- Individual risk factors, such as smoking and pre-existing lung disease.

Although all forms of asbestos are considered hazardous, different types of asbestos fibers may be associated with different health risks. For example, the results of several studies suggest that amphibole forms of asbestos may be more harmful than chrysotile, particularly for mesothelioma risk, because they tend to stay in the lungs for a longer period of time.

The current control limits for asbestos dust are: crocidolite, amosite and tremolite - 0.2 fibres per millilitre of air; chrysotile - 0.5 fibres per millilitre of air, averaged over any continuous period of 4 hours, where fibres measured are five millionths of a metre in length or greater. The sample is to be taken by a prescribed membrane filter which is then scanned by a microscope at 400-450 magnification.

The excavation for this project is going to take a considerable amount of time to complete and in this time it appears acceptable to allow thousands of Islander's health to be put at risk for the sake of a new 'Financial Centre'.

### **Zephyrus**

With the proposed Zephyrus development nearby, the application has a condition that the removal and overseeing of spoil must be independently supervised. It is hoped that such a condition is also imposed on this proposed development. Another consideration is will La Collette have the capacity to accept all the excavated waste from this development site as due to its very nature it has to be classed as hazardous.

### **Existing sea wall**

Incorporating the sea wall in to the development may not be possible. There does not appear to be any contingency plans for this happening. Due to the unknown variability of the rock stratum, it may even be impossible to use secant piling. In this event the project is going to have greater problems than it will have already. In my opinion to excavate down three levels for the basement car parks will be an engineers nightmare. In the code of construction it states that the Phase 2 Geo-environmental ground investigation and risk reports are yet to be completed, which really should be done now as they are also intending on constructing a tunnel to re-route La Route de la Liberation. See parking strategy report 1.4).

### **Ground water**

It states in the code of construction in table 1 that they did not know if tidal influences affected the ground water levels. In plans we have seen for Castle Quay 2 the tidal flow is known and also which direction it flows through the development site. Therefore in my opinion this information needs to be gathered for before the development of the proposed Financial Centre.

### **Pollution pathways**

These have not been fully investigated.

### **Heavy Metals**

Their presence has been identified in the waste management plan, page 2, therefore any water discharge permit application should take due consideration of this and look at the ways that the heavy metals can be removed from any potential water discharge from the site. Also it is known that there is likely to be incinerator ash in the excavated waste.

### **Preliminary Hydrological Report**

For a proposed development of this size this can only be described as wholly inadequate. There appears to be no borehole samples from the actual area of building 4 and limited leachate testing has been undertaken.

Mrs Lara Luke BSc(Hons) Dip Poll Con (Open)  
Save Our Shoreline

At the time of writing this submission, we are still waiting for the answers to the below questions (sent in an email on the 16th September 2013):

1. What is the expected volume of waste that will be excavated and treated as contaminated from the proposed esplanade financial quarters development?
2. What is the percentage volume that has to be added to this as a result of expansion after excavation?
3. What is the capacity of a cell at La Collette?
4. What is the financial cost of one cell?
5. What are the space requirements for the contaminated excavated waste at La Collette?
6. Can La Collect receive this volume of waste?
7. How will this volume of contaminated waste affect the life of La Collette?
8. Will a new disposal site be chosen?

Specifically looking at the car park:

Further to the above questions, the current application does not deal with the following aspects adequately and/or show a lack of information.

- It states that no further EIS needs to be submitted as the car park does not exceed existing parameters of the applications for the other buildings. This is incorrect as the development will now go sub strata and does exceed the parameters of existing applications. A separate well informed EIS needs to now (it should have been already been completed) be undertaken as a matter of urgency.
- Method of transportation of excavated fill to disposal site.
- Mitigation measures to prevent escape of contaminates from excavated fill.
- How will an excavation of this size affect the groundwater table?
- Will there be any environmental concerns when/ if this happens?
- What is the hydrological data from the site in question?
- What will be the excavation methods?
- How will the public and site workers be protected from potential contaminates?
- Can La Collette accept the expected level of waste from this particular development and if not what would happen to the contaminated fill?

Here we have another application that is completely missing any information of any value, however this is something that in my opinion I have learnt to expect. The overall quality of the EIS can be described at best as extremely poor. I look forward to being able to provide more substantial comment when we see the applicant make a proper and detailed application for such a grand scale development.

A very valued colleague, Mr Keith Shaw, who campaigned tirelessly up until his death from mesothelioma about both the procedures and policies of the environment department, therefore on his behalf I have included one of his letters highlighting his concerns:

Mr. Keith Shaw

**Objection to application WML024 for the dumping of Asbestos Waste on the La Collette reclamation site in St Helier under Article 17 of the Waste Management (Jersey) Law 2005**

Dear Minister, you are well aware of the issues exposed by the recent Scrutiny Panel, which were witnessed by yourself about pollution problems caused by contractors carrying out ground works for the construction of the replacement incinerator, at the La Collette reclamation site.

\*You will no doubt recall how you witnessed your staff trying to divert discussions surrounding the poor quality workmanship that was taking place.

\*I recollect that one of your senior staff attempted to compare the land where work was being done on the La Collette reclamation /dump to the beach area at Greve d'azette.

\*Please correct me if I have got the wrong impression, but I also believe that one of your senior staff even asked for the written transcript records of the Scrutiny Process to be amended with respect to his earlier comments.

\*You will be aware of the efforts taken by one of your staff to halt problems that were being caused by the alleged unsafe practices by the contractors, which had been observed and documented by an agent of T&TS's main contractor.

\*There was evidence that some of your Senior Officers were totally unfamiliar with the friable nature and instability of the rock beneath their feet, and how water could & did travel through it, possibly due to fissures reaching heights higher than high tide levels.

\*There was evidence of the widely held belief in the strength and resistance to problems from the surface underneath & materials inside of these marvellous / impervious Butyl bags.

\*You will be aware that the work done by the contractor was carried out in such a poor manner and quality that the Attorney General is presently considering it for legal action as it was carried out in clear contravention of the contractual obligations and local laws.

\*You will be aware that T&TS allowed serial Health & Safety issues to go unchecked over a long period and failed to report them to the local regulatory authorities.

\*All of these issues placed your management of the Planning & Environment Department under the spotlight with respect to its effectiveness and respect for the environment we live in.

In the opinion of many people the past history of this site, managed by your Department has seen a serious catalogue of errors.

Indiscriminate dumping of any and all toxic and putrescent waste has evidently occurred.

Apparently despite staff being employed to manage and monitor the site problems occurred and records are not sufficiently accurate.

**To recap Application WML 024 registered 17-02-11**

It seeks to move a known mass and volume of highly toxic material from its present temporary location, where it was placed in old rusty leaking and structurally unsound steel boxes. It remained in these inadequate containers for many years as they slowly deteriorated and possibly allowed the waste to escape.

The plan appears to be to move said Toxic Waste to an area with a dubious/uncharted history for its structural integrity. The placing of the Toxic Waste into pits dug into areas made from structurally unstable materials and then lining them with clay in areas that are known to be prone to flooding and leaching seems to be bizarre.

Dumping of asbestos has been going on for many years in the La Collette area and records may be inaccurate as to when, how much, where and how it was dumped.

Some of it was just dumped on the ground and allowed to enter the sea.

Deputy Paul Le Claire told a meeting of Havre des Pas residents 5-6 years ago that he has photographic evidence of dumped asbestos waste on the shoreline. the asbestos waste before the statistics started before 2006 when records began.

There were site managers whose role was specifically to monitor Asbestos waste in place since 1998 yet records for stored Asbestos on start in xdxxx. Where was the asbestos going to during that time and how was it stored.

Cell 30 is not landfill it is reclaimed land (quote)

£ sets of drawings , 2 books etc to go through.

Main points I got were

pit will be made from clay - - no lining was mentioned (From memory)

Pit will be covered in clay - plus drain channels to a sump!?

40m wide x75m long x 5m deep 10m above datum!

Nominal Volume 10,000 cu m

The location could be exactly where they are now as I guess that location has been used for its present purpose for yonks! Needs checking.

There are 200 containers which were 2nd hand when bought and go back to 1976 or 86 ( needs to be checked and discussed with others) some were filled by others off site.

Total weight -estimated 1,500 tonnes 4,500 cu m volume

Management has been by one person mainly Dennis Rive, Assistant Mngr 1998 - 2000 then Manager since.

They are planning for containers to be unable to be moved without collapse. which means that they believe they probably already are and therefore are leaking and or leaching.( request made to H&S Insp for a check of ground area surrounding containers - T&TS will already have done that but may not be revealing results-facts - but be talking about use of caution - sounds better for them!)

Method statements indicate a process of lifting slightly and checking in several stages( I didnt find out what will be done if they believe the containers are too fragile to move. I expect that the bases of the containers have sagged but are presently supported by the tops of the ones underneath!, which is why they will be lifting in several stages) by cameras and visually before decision is taken to physically move them. ( Not sure where - I would think that there will have to be poss 3 sites Good - ok to move and empty, store contents ready to be replaced Bad- container collapses at present location and has to be hand emptied & content moved to safe location- then container dealt with and taken to = Ugly - where the old containers go to to be decontaminated before going to Bellozanne. to be burnt in the incinerator like other tin cans.)

The lucky side of the container issue is the relative lightness of asbestos in most forms - so unless the old containers were really crap and damaged ie not waterproof the bottoms should not be heavily loaded . All stuff should have been treble bagged - but they acknowledge some contained were filled off site ! so I guess they are red flagged already as potential problems form poor storage.

This is going to be a massive exercise with many unknowns - and several areas of potential hazardous issues. All emergency services will need to be alerted I reckon. Plus lots of areas sealed off against potential for air borne pollution.

I am not going to bother counting the containers but might just go for a look see later.

End of letter.

Summary:

It can be shown by the nature of the questions posed to the various departments and the absence of any concrete answers, that the policies and procedures fall short of the expectations in today's world. Not only do we have ineffective policies and procedures, we have departments that are unable to provide answers to reasonable requests for information which should be at their fingertips.

Mrs Lara Luke BSc(Hons) Dip Poll Con (Open)  
Pollution Consultant and committee member SOSJ,