



NEW SOUTH WALES

15 September 2009

Manager – Manufacturing and Rural Industries
Major Development Assessment
Department of Planning
P.O. Box 39
Sydney NSW 2001

Attention: Chris Ritchie

**RE: Request to Remove Clyde Transfer Terminal Conditions of Development
Consent (DA 205-08-01) Pertaining to Monitoring Requirements at the Nearest
Residential Location**

Veolia Environmental Services (Veolia) requests modification to the Clyde Transfer Terminal (the Terminal) Conditions of Development Consent (COCs) pertaining to environmental monitoring at the nearest residential location.

The residence used by Veolia to conduct monitoring, in accordance with the COCs (*refer to Attachment 1*), is located at 10 William Street, Granville (the Premises). A verbal agreement existing with the previous owner of the Premises allowed Veolia unlimited access to conduct depositional dust, total suspended particulates (TSP) and operational noise monitoring, as well as use of power to operate the TSP units. A change of ownership since late 2008 has limited Veolia's access to the Premises with the new owners reluctant to re-connect power to the building.

Condition 97 of the COCs makes reference to AS 3580.1.1 (2007) which states the selected monitoring site must have adequate and reliable source of electricity. In addition, Veolia has been informed by the landlords once the Premises is leased, access to the property will be discontinued.

In an exercise to source another suitable monitoring location, Veolia has approached several of the neighbouring residents to seek permission to set up monitoring on their properties but without success, making depositional dust and TSP monitoring no longer feasible for Veolia to continue at a residential location. Furthermore, following a review of the monitoring requirements within the COCs and five (5) years of historical dust and TSP monitoring data (*refer to Attachment 2*), Veolia finds that no exceedances have been recorded at the Premises that could be directly related to any construction or operational activities carried out at the Terminal since the commencement of waste operations in 2004. Neither dust nor TSP monitoring



Veolia Environmental Services (Australia) Pty Ltd
Cnr. Unwin & Shirley Streets, Rosehill, NSW 2142. -PO Box 171 Granville, NSW, 2142
tel +61 (0)2 9841 2500 - fax +61 (0)2 9841 2992
www.veolia.com.au ABN 20 051 316 584





(Conditions 49 and 97) are requirements under the Terminal's Environmental Protection Licence (EPL) 11793.

Operational noise monitoring (Conditions 108 -110) is a requirement under both the COCs and the EPL. No noise complaints have been received to date against the Terminal. Veolia would also like the DOP to note that the City Rail metropolitan train network and an Australia Post depot operate between the Terminal and the Premises. Condition 109 states that where it can be demonstrated that direct measurement of noise from the premises is impractical, alternative means of determining compliance maybe be acceptable. Additionally, no noise exceedances have been identified by noise specialists (Hyder Consulting Pty Ltd; Heggies Pty Ltd) that Veolia has engaged in the past to measure the Terminal's operational noise levels.

Based on this information Veolia understands that the noise emitted from the Terminal whilst operating under normal conditions is generally consistent with the background industrial noise levels in accordance with Industrial Noise Policy (EPA, 2000). Veolia therefore proposes that the requirement for operational noise monitoring be removed from both the Terminal and the Premises.

Veolia is still committed to conducting monitoring at the Terminal to determine the depositional dust and TSP levels at the site boundary, however requests to have the requirements to monitor dust and TSP at the residential property and all operational noise monitoring requirements be removed from the COCs.

Veolia invites the DOP to enter into discussions regarding this matter and obtain a resolution. If there are any questions please do not hesitate to call me on (02) 9841 2950 or Toni Soster on (02) 9841 2926

Yours Sincerely,

.....
Veolia Environmental Services
Peter Nicholas
Environmental Management Representative

CC:

The Department of Environment, Climate Change and Water

Enclosed:

Attachment 1
Attachment 2

Clyde Transfer Terminal Conditions of Consent – Air Monitoring Requirements
Clyde Transfer Terminal Historical Air Monitoring Results





ATTACHMENT 1

CLYDE TRANSFER TERMINAL CONDITIONS OF DEVELOPMENT CONSENT – AIR MONITORING REQUIREMENTS

49 The Dust Management Plan shall include, but not necessarily be limited to, control strategies to achieve compliance with dust emission limits in this consent and any environment protection licence. The Dust Management Plan shall adopt the recommendations made by Turnkey Environmental Services Pty Ltd (dated 13 Feb 2006) and provided in Appendix D of the Statement of Environmental Effects Modification to the Terminal Building Forced Ventilation System Clyde Waste Transfer Station (Environ, Oct 2006) in relation to the dust suppression spray system at the terminal. The Dust Management Plan shall provide for the monitoring of the performance of the dust suppression system and for improving its performance as it may be necessary. The Dust Management Plan shall incorporate an Ambient Air Quality Monitoring Plan, prepared in accordance with conditions 96 and 97, including requirements for monitoring and reporting any changes TSP and dust deposition levels in the nearest residential areas after installation of the odour control system subject to MOD-133-11-2006. Following review of monitoring performance results, the Director-General may require the applicant to undertake further investigations, monitoring or implement measures aimed to mitigate identified dust impacts on residential areas associated with the operation of the terminal.

97 The Applicant shall undertake sampling and analysis for ambient air pollutants in accordance with the methods and the frequencies detailed in the table below. Ambient air pollutant monitoring sites shall be selected in accordance with Approved Methods for the Sampling and Analysis of Air Pollutants in NSW.

Pollutant	Location	Method ¹	Frequency
Particulate matter (TSP)	Nearest residence or public space and background	AM1-AM15	As per AM-15
Particulates (deposited matter)	Nearest residence or public space and background	AM1-AM19	As per AM-19

Noted: ¹ All methods are specified in the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW and all monitoring must be conducted strictly in accordance with the requirements outlined in this document.

108 Noise generated at the premises during the operation stage must not exceed the noise limits presented in the table below:

Location	Day	Evening	Night	
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)
First St, Granville (nearest residence)	44	38	39	56
10 Hampstead Rd, Auburn	40	38	38	54
17 Cumberland Rd, Auburn	41	39	39	52



For the purpose of this condition:

- (a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays*
- (b) Evening is defined as the period from 6pm to 10pm*
- (c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays*
- (d) LAeq(15minute) is defined as the equivalent continuous 'A' weighted sound pressure level- the energy average of the noise measured over a 15 minute period
LA1 (1 minute) is defined as the sound pressure level exceeded for one percent of a 1 minute measurement period.*

108A *Within three months of the commissioning of the forced ventilation system subject to MOD-133-11-2006, or as may be agreed by the Director-General, the Applicant shall conduct and submit to the Director-General and the DEC a noise assessment of the terminal whilst operating under normal conditions including operation of the forced ventilation system. The assessment shall be conducted in accordance with the requirements of the New South Wales Industrial Noise Policy (EPA, 2000) for the purpose of assessing compliance with the noise criteria describe in condition 108. The assessment shall include, but not necessarily be limited to:*

- (a) noise monitoring;*
- (b) methodologies for noise monitoring;*
- (c) location of noise monitoring;*
- (d) frequency of noise monitoring; and*
- (e) details of any entries in the Complaints register relating to noise impacts.*

Subject to the results of the assessment, the Director-General may require the Applicant to conduct further investigations or implement measures aimed to achieve compliance with the noise criteria.

109 *Noise from the premises is to be measured at the most affected point on or within the residential boundary to Determine compliance with the LAeq (15 minute) noise limits.*

Where it can be demonstrated that direct measurement of noise from the premises is impractical, the EPA may accept alternative means of determining compliance.

Note: See Chapter 11 of the NSW Industrial Noise Policy.

The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise level where applicable.

110 *Noise from the premises is to be measured at 1m from the dwelling facade to determine compliance with the LA1 (1 minute) noise limits.*

Dust Deposition and HVAS Data

	Jan-06	Feb-06	Mar-06	Apr-06	May-06	Jun-06	Jul-06	Aug-06	OPERATION Sep-06	Oct-06	Nov-06	Dec-06	Jan-07	MIN	MAX	MEAN
DG1 Prefect (residential receptor)	4.0	2.8	3.4	2.1	1.4	1.5	2.9	2.5	2.5	2.8	*	*	*	1.4	4.0	2.6
DG2 W Boundary (Clyde Transfer Terminal)	2.5	3.3	2.6	1.4	2.2	3.3	1.7	3.2	1.4	1.6	*	*	*	1.4	3.3	2.3

Site	OPERATION			
TSP (Prefect) Residential Receiver	Date	TSP (ug m ³)	MIN	MAX
	25/08/2006	23	23	52
	29/08/2006	33		
	2/09/2006	34		
	4/09/2006	52		
	13/09/2006	36		
	15/09/2006	28		
	26/07/2006	66	45	66
	28/07/2006	58		
	1/08/2006	47		
	3/08/2006	47		
	7/08/2006	62		
	12/08/2006	45		
TSP (CTT) Background Receiver				
	26/07/2006	66	45	66
	28/07/2006	58		
	1/08/2006	47		
	3/08/2006	47		
	7/08/2006	62		
	12/08/2006	45		

* Dust monitoring was not conducted during this period as the dust stand at the terminal was damaged during construction work being undertaken on-site by Pacific National, installation of a replacement was underway at the time of completion of this report.

Dust Deposition and HVAS Data

	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07	Jan-08	MIN	MAX	MEAN
DG1 Prefect (residential receptor)	*	*	1.1	0.8	0.8	1.1	1.5	1.1	1.0	1.6	0.5	1.9	0.9	0.5	1.9	1.1
DG2 W Boundary (Clyde Transfer Terminal)	*	*	1.0	1.5	1.5	1.0	1.4	2.0	2.0	1.6	1.9	2.9	3.2	1.0	3.2	1.8

Site	OPERATION					Mean
	Date	TSP (ug m3)	MIN	MAX	MEAN	
TSP (Prefect) Residential Receiver	26/03/2007	19	19	67	36	23
	27/03/2007	27				33
	28/03/2007	42				34
	29/03/2007	39				52
	30/03/2007	20				36
	31/03/2007	26				28
	4/10/2007	42				
	5/10/2007	67				
	6/10/2007	57				
	7/10/2007	36				
TSP (CTT) Background Receiver	8/10/2007	30				
	9/10/2007	29				
	26/03/2007	46	43	99	66	66
	27/03/2007	61				58
	28/03/2007	99				47
	29/03/2007	67				47
	30/03/2007	53				62
	31/03/2007	43				45
	4/10/2007	71				
	5/10/2007	76				
6/10/2007	82					
7/10/2007	56					
8/10/2007	69					
9/10/2007	63					

* Dust monitoring was not conducted during this period as the dust stand at the terminal was damaged during construction work being undertaken on-site by Pacific National. Installation of a replacement was underway at the time of completion of this report.

Dust Deposition and HVAS Data

Site	Jan-05	Feb-05	Mar-05	Apr-05	May-05	Jun-05	Jul-05	Aug-05	Sep-05	Oct-05	Nov-05	Dec-05	Jan-06	MIN	MAX	MEAN
DC1 Prefect (residential receptor)	4.6	4.3	3.3	1.3	1.2	3.6	2.1	4.2	4.7	4.7	3.7	2.3	4.0	1.2	4.7	3.3
DC2 W Boundary (Cycle Transfer Terminal)	4.7	3.6	2.3	4.2	1.1	3.7	4.7	3.2	3.6	3.6	4.4	1.4	2.5	1.1	4.7	3.3

OPERATION

Site	Date	TSP (ug m3)	MIN	MAX	MEAN
TSP (Prefect) Residential Receiver	15/01/2005	58	25	77	43
	18/01/2005	25			
	5/12/2005	77			
	6/12/2005	37			
	15/12/2005	56			
	16/12/2005	27			
	17/12/2005	31			
	18/12/2005	30			
TSP (CTT) Background Receiver	5/02/2005	61	45	99	76
	10/02/2005	51			
	12/02/2005	45			
	15/02/2005	94			
	18/02/2005	96			
	2/03/2005	99			
	21/12/2005	77			
	22/12/2005	87			
	28/12/2005	82			
	29/12/2005	75			
	30/12/2005	64			
	30/12/2006	75			

Dust Deposition and HVAS Data

	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08	Jan-09	MIN	MAX	MEAN
DG1 Predict (residential receptor)	0.9	0.9	0.8	0.8	1.9	0.7	5.3	1.3	3.0	2.4	2.8	1.7	3.3	0.7	5.5	2.1
DG2 W Boundary (Cycle Transfer Terminal)	3.2	3.6	2.2	1.5	2.5	0.9	1.6	2.3	2.6	3.1	5.6	4.5	4.4	0.9	5.6	2.9

Site	OPERATION				2007 data Period Mean Annual Mean											
	MIN	MAX	MEAN		Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08
TSP (Predict) Residential Receiver																
27/03/2008	14.8	122	47		19											
28/03/2008	16.3				27											
29/03/2008	17.2				42											
30/03/2008	24.3				39											
31/03/2008	21.2				20											
1/04/2008	33.8				26											
10/09/2008	48.5				42											
11/09/2008	79.4				67											
12/09/2008	43.8				57											
13/09/2008	105				36											
14/09/2008	41				30											
15/09/2008	122				29											
TSP (CTT) Background Receiver																
27/03/2008	40.6	129	72		46											
28/03/2008	37				61											
29/03/2008	24.9				99											
30/03/2008	54.6				67											
31/03/2008	65.9				53											
1/04/2008	98.8				43											
10/09/2008	97.9				71											
11/09/2008	94.4				76											
12/09/2008	96.9				82											
13/09/2008	99.5				56											
14/09/2008	42.8				69											
15/09/2008	129				43											

* Sample lost - dust bottle used found damaged due to weather conditions knocking sand over

** Residential dust depositional level exceedance noted at 5.5g/m²/month. Level from dust stand at terminal is 1.5g/m²/month which is within limits set out in the OEMP. Exceedance from another source in the area.

* TSP results have shown spikes above 90g/m²/month during sampling from 10/09/08 - 15/09/08. The average for 2008 is 72g/m²/month which is within limits set by the NSW Action for Air legislation. It is expected that pre construction activities for construction of the new hardstand have contributed to the elevated dust levels. A spike in dust levels is to be expected prior to completion of the new hardstand.

--- Depositional dust level exceedance noted at 5.5g/m²/month at DG2. Levels at residential receptor are within limits set in OEMP and consistent with results from the past few months. This exceedance not indicating a relationship between dust levels at nearest residential receptor DG1 and high levels at DG2

	OPERATION										MIN	MAX	MEAN	
	Jan-08	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09				Nov-09
DG1 Prefect (residential receptor)	3.3	1.7	1.1	1.5	0.8	1.2	1.1	1.9						
DG2 W Boundary (Clyde Transfer Terminal)	4.4	1.4	2.5	4.3	2.5	5.8	2.2	4.1						

2007 data	Period Mean	Annual Mean
14.8		
16.3		
17.2		
24.3		
21.2		
33.8	21	
48.5		
79.4		
43.8		
105		
41		
122	73	47
40.6		
37		
24.9		
54.6		
65.9		
90.8	72	
97.9		
94.4		
90.9		
99.5		
42.8		
129	92	72

ite with constant unloading of soil loads. Retest 7 days later 3.0g/m²/month