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John Booth
Planning Officer - Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear John,

**SECTION 4.55(1A) MODIFICATION (MOD 10 - DA 401-11-2002I) - EXTENSION TO EXISTING SOLID WASTE DERIVED FUELS (SWDF) STORAGE - BERRIMA CEMENT WORKS
RESPONSE TO SUBMISSIONS**

1 Introduction

A modification application was lodged by Boral Land and Property Group with the Department of Planning and Environment in February 2019. A statement of environmental effects (**SEE**) accompanies the application which described the proposal and the likely environmental impacts.

The proposed modification involves changes to the dimensions of the SWDF storage shed, and sundry improvements to the existing SWDF storage shed including a minor extension to vehicle access doors to improve vehicle access and manoeuvrability.

The SEE was forwarded to the Environmental Protection Agency (EPA) on 15 February 2019 for comment; a response was subsequently provided on 1 March 2019. The following provides a response to the matters raised in the letter.

2 Estimated Storage Volumes and Shed Dimensions

The following response was provided by the EPA:

There appears to be inconsistencies in several calculations in the SEE document.

The SEE provided by Boral advises that the "as-built" SWDF storage shed has a floor area of 720m² and a storage capacity of 19,300m³ (Table 3.1). If these figures were correct it would result in the height of the waste stored in the shed being approximately 27m. Similarly, the specifications of the "as approved" shed (also Table 3.1) state a floor area of 1650m² and a storage capacity of 44,230m³ (Table 3.1), giving a waste storage height of approximately 30m. Table 4.1 states the height of the SWDF storage shed is 16.5m. There appears to be an error in the figures provided in Table 3.1 and Table 4.1.

Similarly, Table 4.1 advises that if approved the modified shed would have a floor area of 1,104m² (vs the existing 720m²) and a storage capacity of 21,700m³. Although the proposed extension to the shed will almost double the usable storage

floor area, Table 5.1 states the storage capacity will only increase from 19,300m³ to 21,700m³, or approximately 12%. There also appears to be an error in these figures.

The proposal seeks to make the following structural changes to the shed, which are reflected in Table 4.1 of the SEE, and highlighted in yellow here:

	Approved (MOD 9)	'As built'	Proposed (MOD 10)
SWDF shed specification			
Width (m)	30	16	16
Length (m)	50	45	69
Floor area (m ²)	1,650	720	1,104
Height (m)	16.5	No change	No change
SWDF storage and throughput			
Maximum SWDF throughput to Kiln 6 Operations (tpa)	100,000	No change	No change

The increased length of the shed is achieved through a 24m extension in length. The proposal does not seek to change the volumes of material which can be stored within the shed, from that which was originally approved.

The figures provided with regard to storage capacity, in m³, were theoretical storage figures calculated by taking into account the height of the shed; however this volume will not actually be achieved as material will not be stored to the full height of the shed. Rather, the final row in Table 3.1 provides an indicative representation of the shed volume.

We note an error in calculation was provided, thereby herewith the revised Table 3.1, with the corrections identified in yellow, and the proposed modification added in the final row:

	Width (m)	Length (m)	Floor area (m ²)	Shed volume in m ³
Approved	30	50	1,500	24,750
As built	16	45	720	11,880
Proposed	16	69	1,104	18,216

The proposal does not seek to increase the storage capacity from that which was originally approved; thereby the modification will not increase the storage of SWDF material on the site from that which was originally approved.

3 DA Modification 9

The following response was provided by the EPA:

The development will be subject to the conditions of the recently approved Modification 9 (DA 401- 11-2002 MOD 9). This approval allows the for the

construction of a fuel handling, storage and feed system. The EPA does not propose any new or amended consent conditions.

We note the EPA's response.

4 Environmental Protection License

The following response was provided by the EPA:

The EPA regulates the activities undertaken at the premises through Environment Protection Licence (EPL 1698). The existing licence conditions appear adequate to regulate this proposal. If any new information arises in relation to the proposal and its impact on the environment, the EPA can vary this licence.

We note the EPA's response.

Conclusion

I trust that the information provided in this letter report has addressed all of the relevant areas in the submission received. Please contact me at the undersigned below if you require any further information or clarification.

Yours faithfully,



Adnan Voloder

Planning & Development Manager
Boral Land & Property Group