



DOC19/499596

Mr Kelly McNicol
Team Leader, Industry Assessments
Department of Planning, Industry and Environment
Via email: information@planning.nsw.gov.au

Attention: Ms Susan Fox

10 July 2019

Dear Mr McNicol

Bulk Recovery Solutions Pty Ltd – Ingleburn Facility – SSD 8593

I refer to the email dated 7 June 2019 from Jessica Fountain to the Environment Protection Authority (EPA) regarding the notice of exhibition for the Ingleburn Resource Recovery Facility under SSD8593 (Proposal).

We are unable to undertake a detailed assessment of the Proposal and therefore cannot support the Proposal in its current form as the proponent has not sufficiently addressed a number of requirements:

- A detailed assessment and related flow diagram for *each waste stream* which the proponent has nominated in the EIS (Table 4 – Proposed Waste Types) has not been provided as required in section B.b) of EPA SEARS.
- We have identified a number of waste types proposed to be received by the proponent that have the potential to generate odour which are not addressed in the odour source inventory of the Air Quality Impact Assessment (Table 6-3). As per the Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales, the AQIA report should be revised to include:
 - A detailed list of all process inputs and outputs that could give rise to odours
 - Plans, process flow diagrams and descriptions that clearly identify and explain all pollution control equipment and techniques for all processes on the premises
 - A description of all aspects of the air emission control system, with particular regard to any fugitive emission capture systems
 - The operational parameters of all emission sources, including all operational variability, i.e. location, release type (stack, volume or area) and release parameters (e.g. emission concentration and rate)
 - An updated odour emissions inventory that includes a detailed discussion of the methodology used to calculate the expected odour emission rates for each source and detailed calculations of odour emission rates for each source. All potential odour sources should be included in these calculations.

- A number of the plans submitted by the proponent detailing vehicular movement within the site show vehicle paths directly through the nominated receivals area for solid waste. We require further information detailing how the proponent will meet the EPA's minimum standards for managing construction waste in NSW, given the limited space available.
- We have concerns that the proposed methodology for the treatment of asbestos containing liquids may not adequately remove all asbestos fibres prior to discharge to sewer. Further information about this process and any associated testing is required. The proponent should also ensure that discharge of this material to sewer is covered by the trade waste agreement with Sydney Water.
- During a meeting with the proponent on 12 September 2017, the EPA expressed the need to ensure that outgoing waste types meet EPA Resource Recovery Orders (RRO). There is no indication from the proponent in the Proposal that indicates that outgoing waste types will meet the RRO's as required.

The EPA will be in a better position to recommend conditions for project approval once sufficient information is provided as detailed above.

If you have any questions about this matter, please contact Matthew Davidson on (02) 4224 4104.

Yours sincerely



MEGAN WHELAN
Unit Head Waste Compliance
Environment Protection Authority