

Letter



Date: Tuesday, 8 February 2022

Willowtree Planning

Suite 1, Level 10, 56 Berry Street North Sydney, NSW 2060

FAO: Cameron Gray

Project Name:	SSD 25725029 – Ardex Warehouse and Manufacturing Facility
Reference:	21.1137.FL2V1
Status:	Final

Further to your email dated 22 December 2021 and associated comments received on the Air Quality Impact Assessment (AQIA) for the proposed Ardex Warehouse and Manufacturing Facility located at Kemps Creek, prepared by Northstar (21.1137.FR1V3, 5 November 2021), please find overleaf our response to relevant Department and Agency comments relating to air quality. It is noted that comments have also been received from Penrith City Council, although no comments requiring a response in relation to air quality were received.

A response to the proposed conditions of consent, as provided by NSW EPA is also presented.

We trust the responses close out these issues without further need to undertake any additional analysis. If you require any further information or clarification, please do not hesitate to contact the undersigned at your convenience.

For and on behalf of

Northstar Air Quality Pty Ltd

A handwritten signature in black ink, appearing to read 'M Doyle'.

Martin Doyle

Director

Reviewed by: LS

Department / Agency	Comment	Response
Department of Planning, Industry and Environment (DPIE)	24. The Department requires the AQIA to be revised to include a map identifying the sensitive receptors used in the assessment. Details of the property addresses are also required.	Figure 7 provided in the AQIA (ref 21.1137.FR1V3) provides a uniform grid map of the modelled receptors. As the exact location of sensitive receptors at off-site locations was unknown at the time of the assessment, a conservative approach has been adopted which provides predicted impacts at off-site locations on a uniform grid. For the purpose of the assessment, all of the individual receptor points shown on Figure 7 were considered as 'sensitive receptors' within the assessment. As the exact locations of these are unknown, no property addresses are available.
	25. The Department notes the AQIA considers cumulative air quality impacts. The Department requires the Applicant to confirm whether the Kemps Creek Data Centre (SSD-1010198) is included in the AQIA. The AQIA is to be updated as required.	Section 4.4 of the AQIA provides specific discussion of the Kemps Creek Data Centre (SSD-1010198). As stated in Section 4.4 of the AQIA: An EIS is currently being prepared for SSD 10101987 (Kemps Creek Data Centre), which is located immediately to the south of the Proposal site, and within the Kemps Creek Warehouse, Logistics and Industrial Facilities Hub. No detailed AQIA to support that SSD is available on the NSW Government Major Projects website at the time of writing, and no specific commentary can be provided regarding the potential for cumulative impacts with the Proposal. However, in broad terms, emissions of air pollutants associated with the operation of a data centre development are likely to be sporadic, and related to the requirement for emergency power generation, and in this specific case, diesel fuelled power generation. As indicated in the scoping report, <i>It is noted that the generators are for standby emergency backup power only and would be used only when required; thereby, the potential air quality impacts associated with the operational phase would be considerably low.</i> Emissions of nitrogen dioxide (NO₂) are likely to be the limiting factor for a data centre development, rather than impacts associated with particulate matter, and the potential for cumulative impacts to occur with the Proposal is low, given that emissions of NO₂ from the Proposal would be limited to vehicles. Based on this, no further update of the AQIA is required.

Department / Agency	Comment	Response
	26. The Department notes the AQIA recommends an Air Quality Management Plan be prepared for the proposal without the detailed analysis to support this position. The Department requests further analysis in the assessment of air quality impacts.	It is assumed this comment refers to the recommendation for a Construction Air Quality Management Plan to be implemented and adhered during construction of the Proposal as outlined in Section 2.3.1 of the AQIA. As outlined in this section of the report, construction of all roads and buildings has previously been approved as part of SSD 9522. Development of a Construction Air Quality Management Plan (CAQMP) was recommended based on a construction dust risk assessment which was performed as part of this SSD 9522 submission. Detailed analysis, including the risk assessment approach and outcomes have been undertaken as part of this, with a range of management and mitigation measures identified as a result, with detail of these measures to be included within the recommended CAQMP. Based on the above and construction risk assessment provided within the previously approved SSD submission for construction of the roads and buildings, further analysis is not considered to be required.
NSW Environment Protection Authority (EPA)	2a. odour emissions likely to be generated during the mixing of chemicals/solvents have not been adequately addressed. Gaseous pollutants and odour from liquid manufacturing have been identified as potential emissions affecting air quality, however this has not been explored further.	As outlined in Section 2.2.2 of the AQIA, none of the chemicals proposed for use in liquids manufacturing have been identified as being particularly odorous. Nonetheless, the volumes of chemicals stored on the site would not necessitate external storage, therefore potential air quality issues associated with odour would be contained. Additionally, the proposed recommended operational condition put forward by the EPA for the site which stipulates <i>the applicant must not cause or permit the emission of any offensive odour from the premises</i> would ensure odour impacts do not extend beyond the site boundary. Based on the above, further assessment of potential odour impacts affecting air quality is not considered to be required.

Department / Agency	Comment	Response
	Background concentrations of TSP has been estimated due to the lack of available representative data from the nearest weather stations. The report concludes that there are no additional impacts at the nearest sensitive receptors off-site, located two kilometres from the subject site but does not consider the impact of TSP on neighbouring businesses within the industrial precinct.	As previously identified, the nearest sensitive receptors subject to assessment are presented in Figure 7 of the AQIA. The assessment has therefore appropriately considered the impact of TSP at all off-site locations.
	The cumulative impacts on sensitive receivers from operations occurring across the broader industrial precinct cannot be adequately assessed due to the potential industrial operations being largely unknown.	Noted. No further comment required.

Department / Agency	Comment	Response
	The AQIA conservatively estimates the particulate emissions (the primary source of emissions for this proposal) from the powder and liquid manufacturing operations, however it is not clear whether parts of the loading and filling operations are conducted entirely within the warehouse (e.g. the transferring of 100 kg bags of powdered raw material into small silos using a hoist) or whether any raw materials are stored outside the warehouse.	In accordance with the Plan of Management developed for the Proposal, raw products will be stored within the silo's or within the mixing tanks (depending on the product) as part of the manufacturing process, which are all contained within the warehouse building. These processes would all be controlled in accordance with the emission control techniques outlined in Section 2.2.3 of the AQIA. In addition, all loading and filling operations (such as transfer of raw materials into small silos) would be conducted entirely indoors within the warehouse.

NSW EPA has also provided recommended conditions of consent for the Proposal. A response to those proposed conditions is presented below.

Recommended Condition	Response
The applicant must take all reasonable steps to minimise dust generation during construction activities.	Agreed. This would be managed through a Construction Air Quality Management Plan, as proposed in the AQIA.
The applicant must not cause or permit the emission of any offensive odour from the premises.	Agreed – this condition will ensure no offensive odours are emitted beyond the site boundary.
The applicant must implement the reasonable and feasible operational control measures described under points 2.2.3 of the AQIA.	Agreed
The applicant must maintain and operate environmentally critical infrastructure in a proper and efficient manner, including all dust collectors and filters, in accordance with point 7.1 of the AQIA.	Agreed
The applicant must not undertake any loading or filling activities unless environmentally critical infrastructure, such as dust collectors and filters, are functioning appropriately in accordance with manufacturer's specifications and performance guarantees.	Agreed
The applicant must undertake post-commissioning air quality monitoring targeting TSP, PM ₁₀ and PM _{2.5} within 12-months of commencing operations.	Further clarification required regarding this proposed condition. We suggest that this condition should relate specifically to points of emission rather than general ambient monitoring.