

Prestons Waste Treatment Facility

Response to Submissions

15 MAY 2023



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Acronyms and Abbreviations

Acronym	Definition
AQIA	Air Quality Impact Assessment
ATPIA	Addendum Traffic Impact Assessment
Arcadis	Arcadis Australia Pty Limited
CEMP	Construction Environmental Management Plan
Council	Liverpool City Council
DA	Development Application
DPE	Department of Planning and Environment
e.g.	for example
EIS	Environmental Impact Assessment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulations	<i>Environmental Planning and Assessment Regulations 2021</i>
EPA	NSW Environmental Protection Authority
EPL	Environmental Protection License
FRNSW	Fire and Rescue NSW
IPC	Independent Planning Commission
Km	kilometres
L/s	litres per second
Liverpool LEP 2008	<i>Liverpool Local Environmental Plan 2008</i>
LGA	Liverpool Local Government Area
LoS	Level of Service
m	metre
m ²	square metres
m ³	cubic meter
NVIA	Noise and Vibration Impact Assessment
NSW	New South Wales
OEMP	Operational Environmental Management Plan
Planning Systems SEPP	<i>State Environmental Planning Policy (Planning Systems) 2021</i>
PM10	Particulate matter - 10 micrometres or less in diameter
PM2.5	Particulate matter – 2.5 micrometres or less in diameter
Hi-Quality	Hi-Quality Waste Treatment Services Pty Ltd (the Applicant)

Prestons Waste Treatment Facility – Response to Submissions

Submissions report	Response to Submissions Report
SEARs	Secretary's Environmental Assessment Requirements
SSD	State Significant Development
SSD 9346594	State Significant Development application
The Applicant	Hi-Quality Waste Treatment Services Pty Ltd
tpa	tonnes per annum
Transport and Infrastructure SEPP	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>
WTF	Waste Treatment Facility

Executive Summary

Introduction

This Response to Submissions report (submissions report) has been prepared on behalf of Hi-Quality Waste Treatment Services Pty Ltd (Hi-Quality) (the Applicant) to support a State Significant Development application (SSD 9346594) for the construction and operation of a Waste Treatment Facility (WTF) at 9-13 Whyalla Place, Prestons NSW (the Proposal) in accordance with Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The Applicant is seeking approval to optimise an existing site for the purpose of processing and treating contaminated soils, sludges and liquid wastes to a level suitable for reuse or disposal to a landfill or sewer, with a throughput capacity of up to 270,000 tonnes per annum (tpa).

This submissions report has been prepared by Arcadis Australia Pty Limited (Arcadis) on behalf of the Applicant to support an application for the approval of the Proposal and it has been prepared in alignment with Part 3, Division 5, Clause 59(2) of the *Environmental Planning and Assessment Regulations 2021* (EP&A Regulations) and *Appendix C to the state significant development guidelines* (DPIE, 2021).

Proposal Site description

The Proposal Site is located at 9-13 Whyalla Place, Prestons NSW (Lot 103 DP 866530), in Liverpool Local Government Area (LGA), in an area zoned IN3 Heavy Industrial and has approximately 9,100 square metres.

The nearest residents are located within 500 metres south across Hoxton Park Road. There is a church approximately 350 metres to the north, in proximity to Hoxton Park Road and a recreational oval and sporting facility (Liverpool Catholic Club). There is also a swimming school located approximately 150 m to the north and a Mercure Hotel is located approximately 350 metres to the northwest. The closest surface water receptor is Maxwells Creek, located approximately 300 metres to the east of the Proposal Site.

The previous activities developed on the Proposal Site were a pre-cast concrete slabs manufacturing (between 2005 and 2014) and an audio/video equipment manufacturing and warehouse (between 2014 and 2020). Currently, Hi-Quality is leasing the warehouse space for interim commercial use to Australia Post and is occupying the office space.

The existing infrastructure comprises the following:

- A warehouse building of 4,097 square metres with adjoining office facilities
- Car park
- Water tank
- Landscaped area
- Pumphouse
- Two dual driveway entrances along the eastern boundary (a northern entrance and a southern entrance), which provides access to the existing building with direct roller door access.

The Applicant and Proposal objectives

The Applicant is a fully owned subsidiary of Hi-Quality Group, which was established over 50 years ago has 14 operational sites located in NSW, ACT, Queensland and Victoria and carries out the following activities:

- Waste treatment
- Waste management and landfill
- Resource recovery and recycling
- Skip bin

- Transport, logistics and plant hire
- Civil and environmental services
- Quarrying
- Building and landscaping product supplies
- Property development

Hi-Quality's Yatala site in Queensland is a WTF approved and licensed to treat up to 350,000 tonnes of waste per annum, with similar waste types, treatment technologies/process and environmental controls to the Proposal.

In alignment with the Applicant's experience and objectives, the Proposal Site aims to:

- Facilitate treatment technologies to reduce potential health and environmental impacts.
- Promote the diversion of waste from landfill for alternative uses and beneficial reuse.
- Develop more efficient recovery of resources.
- Provide a strategic waste treatment service that would play a key role in the delivery of construction and development within Western Sydney and wider region.

Proposal description

The Proposal involves the construction and operation of a WTF to process and treat contaminated soils, sludges and liquid wastes to a level suitable for reuse or disposal to a landfill or sewer, with a throughput capacity of up to 270,000 tpa.

The Proposal's key construction components would consist of an extension of the existing building and construction of the following ancillary infrastructure:

- Weighbridges and weighbridge office
- Office and laboratory space configuration within the existing office space
- Driveway
- Parking area
- Truck wash
- Wheel wash

In relation to the operation phase, the Proposal would cover the following activities:

- Classification, screening and acceptance of waste
- Waste characterisation
- Waste storage and handling
- Waste treatment technologies
- Validation and reporting

Submissions overview

The Environmental Impact Assessment (EIS) for the Proposal was publicly exhibited between 19 November 2021 and 16 December 2021. This Response to Submissions report (submissions report) has been prepared to address submissions raised by government agencies, stakeholders, and the public during the exhibition of the EIS. The submissions received included:

- A total of three submissions from government agencies.
- A total of 17 submissions from public stakeholders, including 13 from organisations and four from members of the community.

The three submissions from government agencies were received from:

- Liverpool City Council (Council)

- NSW Environmental Protection Authority (EPA)
- Fire and Rescue NSW (FRNSW)

Overall, the most addressed topics from both government agencies and the public raised were regarding:

- **Traffic and transport:** queries about how traffic would be managed on site, the ability of surrounding roads to cope with increased traffic and heavy vehicles and the level of carparking to be provided on site. An Addendum Traffic Impact Assessment (Appendix G) has been prepared to provide further intersection modelling and assessment of queuing and parking impacts
- **Air quality:** concerns about the potential for air quality impacts to nearby sensitive receivers and the potential odour impacts. A quantitative odour assessment has been provided as part of the revised Air Quality Impact Assessment (Appendix E) and the impact to nearby sensitive receivers has been confirmed
- **Noise and vibration:** concerns about the completeness of the noise assessment and modelling elements used in the noise and vibration assessment within the EIS as well concern regarding the impact to nearby receivers. A revised Noise and Vibration Impact Assessment has been prepared (Appendix F) and as part of this assessment the impact to nearby sensitive receivers has been confirmed and the elements considered in modelling clarified
- **Health and safety:** concern that the Proposal would impact on the health and safety of nearby residents and workers. Updated assessment conducted as part of the submissions report have confirm that there is unlikely to be an impact on nearby receivers. Additional work at the facility would be carried out in alignment with the proposed management measures, that would be implemented to minimise risk of exposure of workers and the surrounding community to potentially harmful contaminants.
- **Site suitability:** concern that the Proposal Site is not suitability for the Proposal, further detail regarding the suitability of the site and surrounding land use is provided in response to community concerns.

Some comments from government agencies and authorities required additional input from technical specialists, and addendum reporting for traffic, air quality, noise and vibration, and flood risk were integrated into this submissions report. Based on the content of the submissions, the technical specialists provided responses to the issues raised where relevant.

In response to submissions received, asbestos is no longer being planned to be accepted onsite.

In response to the submissions received, some mitigation measures have been updated and refined to better avoid, remedy or mitigate the identified impacts. The mitigation measures presented in this submissions report represent the final mitigation measures to be incorporated into the conditions for the approval of the Proposal, as required by Part 8, Division 5, Clause 192(1)(e) of the EP&A Regulations.

1 INTRODUCTION

Hi-Quality Waste Treatment Services Pty Ltd (Hi-Quality) (the Applicant) is seeking to establish a Waste Treatment Facility (WTF) at 9-13 Whyalla Place, Prestons NSW (Lot 103 DP 866530) (the Proposal Site). As part of this, the Applicant is proposing to optimise an existing site to process and treat contaminated soils, sludges and liquid wastes, with a throughput capacity of up to 270,000 tonnes per annum (the Proposal). An Environmental Impact Assessment (EIS) was prepared by Golder Associates Pty Ltd in November 2021 in order to seek approval for the Proposal under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). In particular, the EIS was prepared to address and be consistent with the Secretary's Environmental Assessment Requirements (SEARs) (SSD 9346594), which were issued on 14 October 2020 by the Department of Planning and Environment (DPE).

In compliance with Clause 194 of the *Environmental Planning and Assessment Regulations 2021* (EP&A Regulations), the EIS was publicly exhibited between 19 November 2021 and 16 December 2021. During this exhibition period, submissions were invited from all stakeholders, including organisations, members of the community and government agencies. The submissions received included:

- A total of six submissions from government agencies
- A total of 18 submissions from public stakeholders, including nearby businesses and members of the community..

The submissions received during the public exhibition of the EIS form the subject of this Response to Submissions report (submissions report), which are discussed and addressed within.

Feedback received within submissions identified that a number of aspects of the EIS were unclear or inconsistent. Accordingly, a revised Proposal description and selected technical assessments have been prepared to support this submissions report.

1.1 Proposal overview and background

The Applicant is seeking approval, under Part 4, Division 4.7 of the EP&A Act, for the construction and operation of a waste treatment facility (WTF) to process and treat contaminated soils, sludges and liquid wastes to a level suitable for reuse or disposal to landfill or sewer, with a throughput capacity of up to 270,000 tonnes per annum (tpa) (the Proposal) at 9-13 Whyalla Place, Prestons NSW (Lot 103 DP 866530) (the Proposal Site).

The Proposal Site is approximately 9,100 square metres (m²) and currently supports a warehouse building (~4,097 m²) with adjoining office facilities, carpark, associated water infrastructure and two dual driveway entrances along the eastern boundary (a northern entrance and a southern entrance), which provide access to the existing building with direct roller door access. Historically, previous activities carried out on the Proposal Site were predominantly commercial and/or industrial. From 2005 to 2014, the Proposal Site was owned by Giroto Properties Pty Ltd, which manufactured precast concrete at the site. From 2014 to 2020, the site was operated as an audio and video equipment manufacturing and warehousing company. Hi-Quality purchased the Proposal Site in 2020 and have been subsequently leasing the warehouse space for interim commercial use to Australia Post and occupies the office space.

A revised Proposal description, provided in Appendix B, has been prepared as part of this submissions report to more clearly articulate the key components of the Proposal and how it would operate. The revised Proposal description also incorporates some minor amendments to what has been proposed (refer Section 6).

The key components of the Proposal would include:

- Classification, screening and acceptance of waste
- Waste characterisation
- Waste storage and handling
- Waste treatment technologies
- Validation and reporting

Construction of the Proposal would be carried out in two stages, with the key construction components being an extension of the existing building and construction of the following new ancillary infrastructure:

- During Stage 1, the following would occur:
 - Minor demolition and earthworks
 - Extension of the existing warehouse building
 - Construction of the weighbridges and weighbridge office and a separate driveway to the existing parking area
 - Upgrade of the existing HVAC and fire fighting systems
 - Installation of push walls and bays and internal leachate drainage, truck and wheel wash
 - Internal fitout of including office space reconfigurations, new laboratory space and a decontamination facility within the existing office building.
- During Stage 2, the following would occur:
 - Installation of waste treatment equipment including tanks, pits, silos, pumping and dosing systems

The Proposal Site and proposed facility are shown in Figure 1-1 and Figure 1-2.

The Proposal Site is located in Liverpool Local Government Area (LGA), within an area zoned IN3 Heavy Industrial, a location predominantly focused on commercial and industrial activities. The land zoned approximately 200 metres to the northwest is B6 Enterprise Corridor and 300 metres (m) to the west, RE2 Private Recreation. The Proposal Site is located:

- Approximately five kilometres west of Liverpool CBD
- Approximately 500 m to the north of M7
- Within 150 metres of two concrete plants and an asphalt plant
- Approximately 200 m southeast of a steel galvanising site
- Approximately 200 m east of a manufacturing/packaging site.

The Proposal Site's nearest residents are located within 500 m south across Hoxton Park Road. Approximately 350 m to the north, in proximity to Hoxton Park Road, there is a church, in addition to a recreational oval and a sporting facility (Liverpool Catholic Club). There is also a swimming school located approximately 150 m to the north and a Mercure Hotel is located approximately 350 m to the northwest.

Maxwell Creek is located within approximately 300 m to the east of the Proposal Site and Cabramatta Creek, approximately 2.2 km northeast.

Prestons Waste Treatment Facility Response to Submissions

- Legend
- Site boundary
 - Residential area
 - ~ Watercourse



1:8,000 at A4
 Coordinate System: GDA2020 MGA Zone 56
 Date issued: August 17, 2022
 Imagery: Neamap

Date: 17/08/2022 Path: C:\Users\ial101256\ARCADIS\30135841 - Prestons Waste RIS - 05 Project execution\GIS\A_Current\B_Maps\WhyallaPL_Preston_v2.aprx

Figure 1-1 Proposal Site

1.2 Purpose of this report

The purpose of this submissions report is to respond to submissions raised by government agencies, stakeholders and the public during the exhibition of the EIS. This submissions report has been prepared to satisfy the provisions of Part 3, Division 5, Clause 59 (2) of the EP&A Regulations and *Appendix C to the state significant development guidelines* (DPIE, 2021). Each of the submissions received has been collated, analysed and addressed (as relevant).

1.3 Statutory approval process

The Proposal is considered State Significant Development (SSD) under Clause 23 (waste and resource management facilities) of Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), which refers to:

(3) Development for the purpose of resource recovery of recycling activities that handle more than 100,000 tonnes per year of waste

The relevant local planning instrument is the *Liverpool Local Environmental Plan 2008* (Liverpool LEP 2008). The Proposal's Site is zoned IN3 Heavy Industrial, which under Division 23 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP) is a prescribed zone in which a waste or resource management facility is permissible with consent.

1.4 Structure of this report

The structure of this submissions report is as follows:

- **Section 1** – Introduction: provides an introduction to and overview of the Proposal, the relevant statutory approval pathway and the structure of this submissions report.
- **Section 2** – Exhibition and consultation: provides a description of the consultation which was undertaken as part of the EIS.
- **Section 3** – Overview of submissions: provides an analysis of the submissions received during the exhibition of the EIS and identifies the key issues raised.
- **Section 4** – Response to government agency submissions: provides a catalogue of submissions received from government agencies and their responses.
- **Section 5** – Response to community submissions: provides a summary of the community submissions received and responses to each issue raised.
- **Section 6** – Amended Proposal: provides an overview of the proposed changes to the Proposal to that presented in EIS
- **Section 7** – Summary of revised technical assessments
- **Section 8** – Revised compilation of mitigations measures: provides a revised list of mitigation measures to include any changes as a result of submissions received or updated environmental assessments of the Amended Proposal.
- **Section 9** – Conclusion: provides a summary and conclusion to this submissions report.

2 EXHIBITION AND CONSULTATION

The EIS was placed on public exhibition between 19 November 2021 and 16 December 2021 in accordance with Part 8, Division 5, Clause 194 of the EP&A Regulations.

The EIS was also available to the public in electronic format on the DPE planning portal website.

2.1 EIS consultation

The Applicant has undertaken ongoing consultation with government agencies throughout the preparation of the EIS, including:

- Liverpool City Council
- NSW Environment Protection Authority (EPA)
- Environment, Energy and Science Group of the Department of Planning and Environment (DPE)
- Heritage NSW
- NSW Fire and Rescue (FRNSW)
- Sydney Water
- Transport for NSW.

The consultation was undertaken through a range of mediums, including emails, phone conversations and letter submissions. Feedback from the agencies consulted informed the preparation of the EIS and the project description as it was then understood.

Key stakeholders and community members were also consulted during the preparation of the EIS by written notification and through the Applicant's website, which provided the key details of the Proposal. A notification letter providing details about the Proposal and the EIS exhibition was mailed to identified community stakeholders in March 2021.

2.2 Post Public Exhibition Consultation

The Applicant continues to maintain the email address, postal address and information phone line for the Proposal, which were established during the preparation of the EIS. These will remain available for use by the community during the construction phase.

Additional consultation has been carried out as part of the response to submissions phase, comprising a virtual meeting with the EPA on the 7 June 2022.

Liverpool City Council (Council) was contacted via phone and email to discuss their concerns however a meeting was unable to be organised to discuss Council's concerns.

2.2.1 Environment Protection Authority

Hi-Quality met with the NSW EPA on 7 June 2022 to discuss the key aspects raised within their submission and to outline the proposed approach for addressing concerns within the submissions report. Section 4.3 provides a detailed response to each aspect raised within the EPA's submission (dated 14 January 2022). In response to the EPA's submissions, as well as other feedback received during the exhibition phase, Hi-Quality have revised a number of technical documents prepared to support the EIS and have prepared supplementary material to better articulate the Proposal, including:

- A revised Proposal description (Appendix B), including a streamlined and more focused list of waste types to initially be received at the Proposal Site and clearer description of how each waste type would be

treated (Annexure A to Appendix B). Only minor changes have been made to what is proposed (refer Section 6), however a revised Proposal description has been prepared to provide better clarity regarding the Proposal and to address inconsistencies within the EIS.

- Revised Air Quality Impact Assessment (Appendix E) and Noise and Vibration Impact Assessment (Appendix F) to better articulate potential air quality and noise impacts
- An Addendum Traffic Impact Assessment (Appendix G) to provide further assessment of traffic impacts
- A draft Operational Environmental Management Plan (draft EMP) (Appendix C) which outlines the proposed operational measures that will be implemented once the facility is operational.

A summary of the aspects discussed during the meeting held with the EPA, and how this have been addressed within this report, is presented in Table 2-1.

Table 2-1 Feedback received during stakeholder consultation

Comment	Where addressed in this report
<p>Hi-Quality’s approach of simplifying and clarifying elements of the Proposal is seen favourably as elements of the assessment needed to be tidied up and a number of inconsistencies needed to be addressed.</p>	<p>A revised Proposal description (Appendix B) has been prepared to clarify elements within the EIS and to outline minor changes proposed (allowing a more streamlined list of waste to be accepted at the Facility)</p>
<p>Queried and raised considerations regarding specific elements of the waste treatment processes, including bioremediation and immobilisation. Points were discussed regarding:</p> <ul style="list-style-type: none"> • The time required to properly bioremediate • The use of General Immobilisation Approvals (considered acceptable) • Possibility to group contaminants into family groupings (as long as appropriately grouped) to support Specific Immobilisation Approvals) 	<p>A revised waste table has been prepared (Annexure A to Appendix B) to list the proposed waste streams to be received at the Facility and describe how each waste stream would be treated.</p> <p>A draft OEMP has been prepared (Appendix C) to provide further detail regarding proposed operations of the Proposal Site procedures.</p>
<p>Noted that there is limited solid waste landfill capacity within NSW and that Hi-Quality needed to ensure an outlet for the waste they are processing.</p>	<p>Solid waste received at the Facility would be treated to a level suitable for reuse, recycling or disposal to landfill. All waste would be analysed to confirm it meets the criteria for its ultimate destination. For example, waste transferred to landfill after treatment would need to meet the disposal criteria for the landfill identified for disposal and would be subject to the NSW waste levy. All wastes received at the WTF would be tracked from the waste generator through to destination facility (e.g. landfill), consistent with the <i>Protection of the Environment Operations (Waste) Regulation 2014</i>.</p> <p>A draft OEMP has been prepared (Appendix C) which outlines processes for directing residual waste to appropriately licenced facilities</p>

Noted that the immobilisation approvals are a separate process to the EIS approval and that Hi-Quality could run the two processes concurrently	Noted
Noted that, pending timing and personnel availability, the EPA would consider a preliminary review of the draft EMP	Noted
Noted the importance of providing robust Air Quality and Noise Impact Assessments	Revised Air Quality Impact Assessment (Appendix E) and Noise and Vibration Impact Assessment (Appendix F) to better articulate potential air quality and noise impacts

2.3 Next steps

As provided in Chapter 2, Part 2.2, Section 2.7 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP) the criteria for an SSD to be determined by the Independent Planning Commission (IPC) is based on the following:

- At least 50 submissions (other than from a council) have been made by way of objection
- The Council for the area objects to the application
- A political donation disclosure statement has been lodged with the application (i.e. a political donation has been made by the applicant).

During the exhibition of the EIS a total of 17 public submissions were received all of which were objections. Council did not object to the Proposal but did provide comment. As no political donations were made by Hi-Quality, no political donations disclosure statement was required to be made. As a result, the Proposal is not required to be determined by the IPC.

3 OVERVIEW OF SUBMISSIONS

Three government agency submissions and 17 public submissions were received during the public exhibition of the EIS between 19 November 2021 and 16 December 2021. Of the 17 public submissions, five were form letters. An overview of the submissions and a summary of the process undertaken to ensure that the submissions have been appropriately responded to is provided below.

3.1 Submissions received

Submissions were received from total of six government agencies, as follows:

- Council
- NSW EPA
- FRNSW
- TfNSW
- Environment, Energy and Science Group
- Sydney Water

A total of 18 submissions were received from members of the public and nearby business owners.

3.2 Submission response methodology

3.2.1 Technical specialist input

In response to government agency and public submissions an additional Flood Assessment (Appendix D), Revised Air Quality Impact Assessment (Appendix E) and Noise and Vibration Impact Assessment (Appendix F) have been prepared to provide further clarity on potential air quality and noise impacts. Additionally, an Addendum Traffic Impact Assessment (Appendix G) has been prepared to provide further assessment of traffic impacts

The additional assessments undertaken are appended to this submissions report and are summarised as relevant in Section 7. The information pertaining to relevant responses have been referenced and addressed in the response tables in Section 4 (Government Agency) and Section 5 (Public) of this submissions report.

3.2.2 Government Agencies

As outlined in Section 3.1, a total of six government agencies provided submissions, all of which raised issues to be addressed. Each submission varied in terms of the number and type of items for consideration raised, with some agencies, depending on their function/responsibility, raising more issues than others. Each agency submission was reviewed and considered. Responses to each government agency submission have been provided in Section 4 of this submissions report.

The submissions were then provided to Hi-Quality technical specialist team for considerations and preparation of a response where applicable, as discussed in Section 3.2.1 of this response to submissions.

3.2.3 Public Submissions

As outlined in Section 3.1, a total of 18 submissions were received from members of the public and nearby business owners. These submissions were summarised into key aspects, issues and sub-issues using a system of reference numbers. Each submission was analysed and responded to at an issue and aspect level., Responses to the key issues raised in public submissions have been provided in Section 5 of this submissions report. Of the 18 submissions received A summary of the key issues raised within public submission has been provided below.

3.2.3.1 Summary of public submissions received

The environmental aspects raised within public submissions, and the number of comments relating to each aspect are presented in Table 3-1 and Figure 3-1. Traffic and transport, air quality and human health were the most frequently raised aspects within the submissions received.

Table 3-1: Overview of submissions

Aspect	Number of comments
Scoping report	1
Project description	2
Justification and project need	2
Site description	12

Aspect	Number of comments
Stakeholder consultation	3
Waste management	1
Traffic and transport	30
Noise and vibration	4
Air quality and odour	19
Soils and water	3
Human health	17
Fire and incident management	5
Socio economic	7
Environmental management	2
Ecologically sustainable development	8
Outside project scope	5

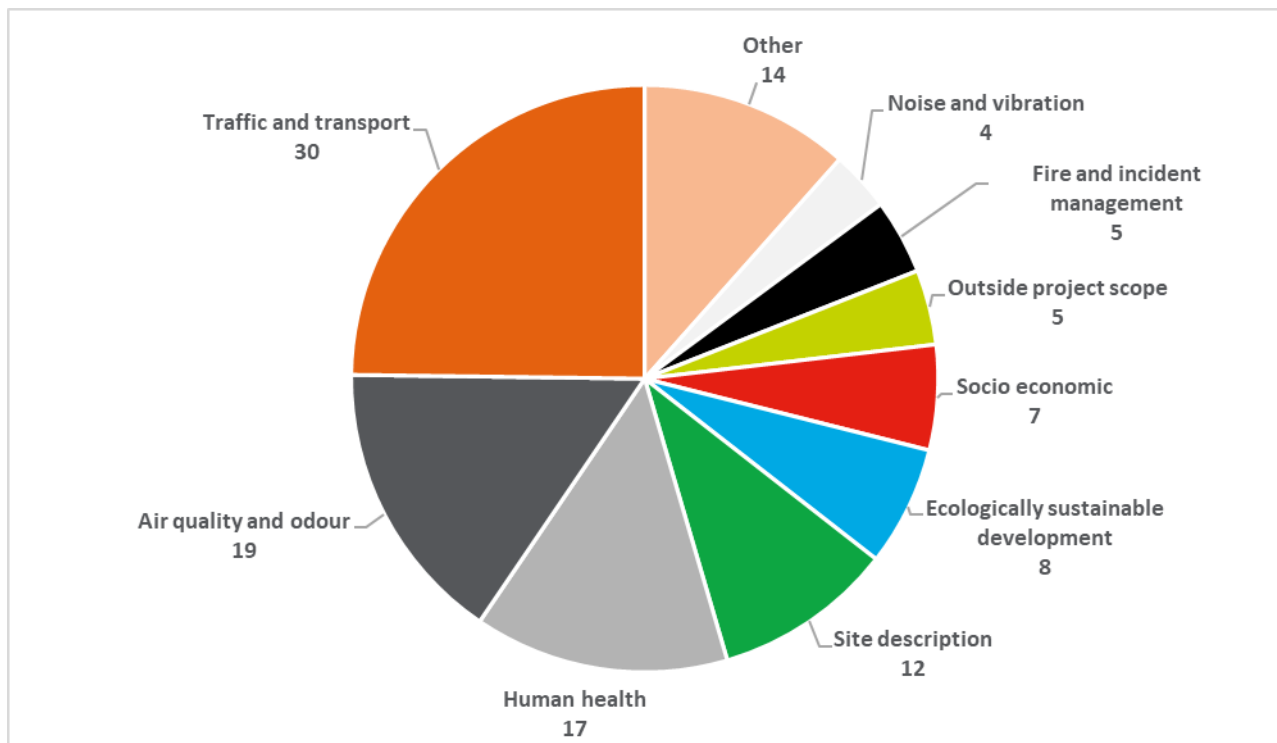


Figure 3-1 Overview of submissions

4 RESPONSE TO GOVERNMENT AGENCY SUBMISSIONS

Submissions received from government agencies between 19 November 2021 and 16 December 2021 have been summarised and responded to in Sections 4.1 to 4.3

4.1 Liverpool Council

A formal submission comprising a letter (dated 20 December 2021) was received from Liverpool City Council (Council). Comments from the submission has been summarised and responded to in the following sections.

4.1.1 Flood Risk

Council provided the following feedback on the Proposal regarding flood risk at the Site:

The submitted design drawings indicate that the ground floor level is 23.2m AHD, which is much lower than the required level. Matters to be addressed:

- i. All floor levels shall be no lower than the Probable Maximum Flood (PMF)
- ii. The structure shall be constructed from flood compatible building components below the PMF
- iii. An engineer's report shall be required to certify that the structure can withstand the forces of floodwater
- iv. Wastewater generated from the site including petroleum and other hazardous chemicals shall not be discharged into downstream site or Council's stormwater system
- v. Appropriate pollution control measures shall be provided to collect, treat and dispose hazardous pollutants from the Site.
- vi. On-site water quality treatment facilities shall be provided to ensure that stormwater runoff leaving the Site comply with Council's water quality standards.

Response

A Flooding and Stormwater Management Study was prepared by Golder Associates in June 2020, which is summarised in Section 11.0 of the Proposal EIS. This study included a TUFLOW flood model, utilising the Council flood model and replaced the existing building structure at the Site with the proposed development as detailed in the EIS and updated Project Description chapter (Appendix B). The model showed that the development had no impact on flooding within the Site and on downstream areas. The model also concluded fluvial flooding impacts would only occur at the Site during a PMF event.

A technical memo addressing flood conditions at the Site has been prepared by Arcadis for the WTF to provide further clarification on the potential flooding impacts and management approach, which also includes a proposed stormwater management strategy. The flood memo is available as Appendix D to this submissions report.

Utilising Golder's flood model, Arcadis has further refined the building representation of the Site and neighbouring properties based on recently obtained topographic survey (2021) and aerial imagery (2022). The existing and proposed fences/external walls of the Site have also been incorporated. The revised flood model was rerun for the 2 hour PMF flood event to produce additional flood hazard mapping of the Site.

The updated modelling showed that during the PMF event an overland flow path forms along Whyalla Place draining to the north. The peak flood depths within the Site are generally 1.00m to 1.25m deep. Peak flood depths along Whyalla Place are deeper than the Site reaching 1.6m at the northern boundary of the Site.

Within the Site the depth velocity product is less than 1 m²/s and is considered a low hazard risk to structures. The proposed redevelopment of the Site does not significantly alter the available flood storage or overland flow paths within or surrounding the Site. As such, the proposed redevelopment does not significantly impact the flood behaviour (peak flood levels or flow velocities) within or surrounding the Site (refer to Figures A1 to B2 of Appendix D).

Flood hazard is a function of depth and velocity. The hazardous conditions a flood creates are classified based on the peak flow depths and flow velocities experienced. The flood hazard experience on Site during the PMF event has been defined as H3, based on the Australian Institute of Disaster Resilience general flood hazard classification, being '*unsafe for vehicles, children and the elderly*'. Under these conditions the Site is considered a low hazard to adults. The flood hazard increases along the Site boundary with Whyalla Place. Along Whyalla Place the flood hazard increases to H5 classification which is considered '*unsafe for vehicles and all people*'.

As noted in the Golders report, the Site is not inundated in the 9-hour 1%, 0.5%, and 0.2% AEP flood events, however local roads will be inundated in these scenarios and access to the Site will be limited or not available. A shelter-in-place strategy is therefore proposed for the Site during flood events, where personnel seek refuge in the existing second level office space, which is above the PMF level. Flood emergency management will be incorporated into the Emergency Management Plan to be prepared for the Site.

Site Floor Levels

As identified by both Council in their submission and Golders in their August 2021 Flooding and Stormwater Management Study, the WTF Site is located outside the 1% Annual Exceedance Probability (AEP) flood extent (an elevation of 23.1 m AHD). The area is classified on Council's online mapping as a low flood risk area, with a flood planning level of the 1% AEP plus 0.5m freeboard (equating to 23.6m AHD). This flood planning level was adopted by Golders, and it was noted as consistent with the existing Finished Floor Level (FFL) of the WTF Site.

Council's submission states that they consider the proposed redevelopment to be a 'sensitive and hazardous development', requiring a flood planning level of the PMF extent (24.5 m AHD). Under the Liverpool Development Control Plan 2008 (Liverpool DCP), the Site falls under the definition of 'concessional development' as it is a change of use, which does not increase flood risk having regard to property damage and personal safety. In accordance with the Liverpool DCP floor level requirements for low flood risk and concessional development includes:

Floor levels to be equal to or greater than the minimum requirements normally applicable to this type of development. Where this is not practical due to compatibility with the height of adjacent buildings, or compatibility with the floor level of existing buildings, or the need for access for persons with disabilities, a lower floor level may be considered. In these circumstances, the floor level is to be as high as practical, and, when undertaking alterations or additions no lower than the existing floor level.

The Proposal aims to maintain existing building floor levels and ensure any building extensions remain above the 1% AEP flood level of 23.1m AHD. Site survey information indicates the existing warehouse floor levels range from 23.5 to 23.6m AHD and these levels will be maintained by the Proposal.

Any on-site parking will be located above the 1% AEP flood level of 23.1m AHD.

Flood compatible materials

Any extension to the existing buildings or modifications of the Site fences/exterior walls will be constructed with flood compatible building components below the PMF level, with an engineer's report to be provided demonstrating that they can withstand the forces of floodwater, debris and buoyancy up to and including the PMF level.

Stormwater and Leachate Management Systems

The Site proposes to have dedicated and independent stormwater and leachate collection systems, which would include:

- All internal pits and drainage points within building areas will be sealed and/or removed, and replaced by a dedicated leachate collection system.
- All materials will be stored on a sealed and bunded surface to minimise the extent of potential spills.
- All building doorways will be bunded with drive-over bunding provided at the truck entry and exit locations.

During Stage 1 water from the leachate collection system would be captured in temporary holding tanks and tested and either disposed of to sewer, if it meets the requirements of a Trade Waste Agreement with Sydney Water, or tankered offsite for disposal at an appropriately licensed site. During Stage 2, water from the leachate collection system will be directed to the proposed onsite wastewater treatment plants for treatment prior to disposal in accordance with a Sydney Water Trade Waste Agreement (see Mitigation Measures in Section 8).

Stormwater discharge

Surface water runoff from the carpark area is proposed to be drained via the existing site infrastructure to Council's network. It is noted that stormwater quality requirements fall under Part 1, Section 6 Water Cycle Management of the Liverpool DCP. However, these requirements apply only to developments that involve additional buildings or hard surface areas. Table 2 of the Flooding and Stormwater Management Study (Golders, 2021) illustrates that the proposed redevelopment replaces existing hard surface areas with building extensions and does not result in a significant increase in impervious areas. Council controls relating to water quality improvements are therefore not applicable to the Proposal. Where required the stormwater drainage network may be modified within the Site to ensure the stormwater and leachate collection system remain separated.

Updated Mitigation Measures

The following mitigation measures have been included in Section 8:

- Any extension to the existing buildings or modifications of the Site fences/exterior walls below the PMF level will be constructed with flood compatible building components. An engineer's report will be provided demonstrating extensions and site fences / exterior walls can withstand the forces of floodwater, debris and buoyancy up to and including the PMF level.
- Any on-site parking will be located above the 1% AEP flood level of 23.1m AHD.
- Flood emergency management will be incorporated into the Emergency Management Plan for the Site and will include a shelter-in-place strategy during flood events.

4.1.2 Traffic, Parking and Access

Council provided the following feedback on the Proposal regarding local traffic and intersection modelling, onsite parking provision, and operational traffic management at the Site:

- SIDRA modelling should use the intersection gap acceptance value for heavy vehicle movements instead of the default value for a light vehicles.
- There is an existing access to the intersection, opposite to Whyalla Road, which is not modelled in SIDRA.
- Consideration is to be given to provide intersection treatments at the Jedda Road/Whyalla Road intersection to improve road safety, particularly for truck movements.
- The car parking provision is less than required 50 spaces according to Liverpool DCP.

- An Operational Traffic Management Plan (OTMP) should be prepared and submitted to Council's Traffic and Transport Sections for review as part of the development consent conditions. The OPTM (to be prepared) must ensure that no vehicle accessing the site is queuing on Whyalla Place.

Response

A Traffic Impact Assessment (TIA) was prepared for the Proposal by PeopleTrans and is summarised in Section 8.0 of the Golders EIS. An addendum Traffic and Parking Impact Assessment (ATPIA) has been prepared by Stanbury Traffic Planning to provide further clarity and intersection modelling as requested by Council and other respondents to the EIS.

SIDRA Modelling – gap acceptance

The SIDRA model in the ATPIA was calibrated to the observed average delay time for each vehicle. As part of the calibration exercise the video footage taken at the time of the survey was reviewed and the time where there were no vehicles waiting to turn right out of Whyalla Place was recorded for the AM and PM peak hour. The right turns included a mixture of heavy and light vehicles. The results are shown in Section 2.5 of the ATPIA. The existing intersection operation was as follows:

- During the AM peak hour, 41 vehicles turned right for a total stop line waiting time of 20 minutes and 6 seconds; an average delay of 29 seconds per vehicle.
- During the PM peak hour, 37 vehicles turned right for a total stop line waiting time of 10 minutes and 33 seconds; an average delay of 17 seconds per vehicle.

The SIDRA modelling was calibrated to this observed average delay time for each vehicle and the modelled results for the existing conditions were found to be:

- During the AM peak hour, average vehicle delay was modelled at 38.3 seconds (Table 6 of the ATPIA), which is 9.3 seconds longer than the recorded average stop line delay.
- During the PM peak hour, average vehicle delay was modelled at 29.4 seconds (Table 7 of the ATPIA), which is 12.4 seconds longer than the recorded average stop line delay.

The average gap acceptance values included in the SIDRA models in the ATPIA therefore take into account the average operation of heavy vehicle movements that exit Whyalla Place.

Whyalla Road and Jedda Road intersection modelling, including Hanson Australia access

The intersection of Whyalla and Jedda roads was modelled using SIDRA to provide a baseline Level of Service at present and assess the impact of the Proposal on the Level of Service. The modelled intersection includes consideration of the driveway of Hanson Australia, opposite Whyalla Road.

An explanation of Level of Service scores is provided in Table 4-1, and the SIDRA modelling results comparing current conditions and proposal conditions is provided in Table 4-2.

Table 4-1: Explanation of Level of Service (LOS) scoring

Level of service	Average delay per vehicle (seconds per vehicle)	Traffic signals and roundabout	Give way and stop signs
A	<14	Good operation	Good operation
B	15 – 28	Good with acceptable delays and spare capacity	Acceptable delays and spare capacity
C	29 – 42	Satisfactory	Satisfactory
D	43 – 56	Operating near capacity	Near capacity

Level of service	Average delay per vehicle (seconds per vehicle)	Traffic signals and roundabout	Give way and stop signs
E	57 – 70	At capacity; at signals, incidents will cause excessive delays. At roundabouts, another control mode required	At capacity and requires other control mode
F	>70	Extra capacity required	Unsatisfactory and requires other control mode

An update to the ATPIA in January 2023 included updated 2022 current year base scenario and 2022 post-development scenario modelling for the intersection at Whyalla Road and Jedda Road, using an updated version of the SIDRA modelling program (version 9). The updated model has taken into account the update of the Jedda Road / Whyalla Place intersection with the southern approach from the Hanson site, and the Hoxton Park Road / Joadja Road intersection with the double right-turn lane that has been installed since the EIS assessment.

The updated model results have been summarised in Table 4-2.

Table 4-2: SIDRA modelling of Whyalla Place and Jedda Road for current conditions and proposal conditions

Intersection of Jedda Road / Whyalla Place / Hanson Concrete	2022 Current conditions		2022 Post development	
	AM	PM	AM	PM
Hanson driveway South approach				
<i>Delay (seconds/vehicle)</i>	101.1 (W)	63 (W)	104.4 (W)	72.7 (W)
<i>Degree of saturation</i>	0.105 (W)	0.225 (W)	0.106 (W)	0.252 (W)
<i>Level of service</i>	F (W)	E (W)	F (W)	F (W)
<i>95th percentile queue</i>	4.2m	7.6m	4.3m	8.7m
Jedda Road East approach				
<i>Delay (seconds/vehicle)</i>	10.9 (W)	9.1 (W)	10.8 (W)	9.3 (W)
<i>Degree of saturation</i>	0.269 (W)	0.354 (W)	0.269 (W)	0.357 (W)
<i>Level of service</i>	A (W)	A (W)	A (W)	A (W)
<i>95th percentile queue</i>	11.6m	11.7m	11.5m	12.4m
Whyalla Place North approach				
<i>Delay (seconds/vehicle)</i>	38.3 (W)	29.4 (W)	42.3 (W)	38.8 (W)
<i>Degree of saturation</i>	0.374 (W)	0.322 (W)	0.425 (W)	0.517 (W)
<i>Level of service</i>	C (W)	C (W)	C (W)	C (W)
<i>95th percentile queue</i>	11.1m	8.4m	13.4m	16m
Jedda Road West approach				

Intersection of Jedda Road / Whyalla Place / Hanson Concrete	2022 Current conditions		2022 Post development	
	AM	PM	AM	PM
<i>Delay (seconds/vehicle)</i>	13.5 (W)	5.8 (W)	13.5 (W)	5.9 (W)
<i>Degree of saturation</i>	0.567 (W)	0.044 (W)	0.561 (W)	0.055 (W)
<i>Level of service</i>	A (W)	A (W)	A (W)	A (W)
<i>95th percentile queue</i>	0.4m	0m	0.4m	0m
Total intersection				
<i>Delay (seconds/vehicle)</i>	101.1 (W)	63 (W)	104.4 (W)	72.7 (W)
<i>Degree of saturation</i>	0.105 (W)	0.225 (W)	0.106 (W)	0.252 (W)
<i>Level of service</i>	F (W)	E (W)	F (W)	F (W)
<i>95th percentile queue</i>	11.6m	11.7m	13.4m	16m

Note: (W) denotes worst movement, as required by the NSW Traffic Modelling Guidelines 2013

The 2022 current conditions model results indicate that the intersection operates at a LOS of F during the weekday AM peak hour, and a LOS of E during the weekday PM peak hour. The model indicates a continued LOS of C for the Whyalla Place north approach, in both the 2022 current conditions and the post development scenarios. The ATPIA acknowledges that some vehicles may experience a delay when turning right out of Whyalla Place, however many vehicles will arrive at the intersection during a gap in traffic created by the signalised junction of Jedda Road and Joadja Road, and experience negligible delay.

The ATPIA also acknowledges that Weld Street provides supplementary access to the industrial land surrounding the Proposal Site. The adjoining intersections of Weld Street, Dampier Place and Whyalla Place can be utilised to provide alternative access and assist to balance traffic that is entering and exiting the immediate precinct via Jedda Road.

Need for intersection treatments to improve safety

The ATPIA also reviewed road safety at the Whyalla Place and Jedda Road intersection. This included a crash history review of data available between 2016 to 2020. The crash data indicated no recorded crashes at the junction in the time period, with the data suggesting no prominent safety issues at the Whyalla Place and Jedda Road intersection and no treatments to the intersection are proposed to accommodate the Proposal.

Car Parking Provision

The parking provision for the Site was also assessed as part of the ATPIA. The provision of 40 parking spaces accommodates the requirements set out in the Liverpool DCP (of 26 spaces), with staff shift changeover at 7am and 3pm being the only time where all onsite car spaces are expected to be occupied.

The assessment prepared for the ATPIA concludes that the provision of 40 parking spaces is satisfactory and no on-street car parking spaces are expected to be required to accommodate staff or visitors to the Site.

Operational Traffic Management Plan

An Operational Traffic Management Plan (OTMP) has been prepared for the Site by Stanbury Traffic Planning and is provided as Appendix 3 to Appendix G of this submissions report. Section 2.6 of the OTMP includes requirements and responsibilities for the Site Manager, which includes ensuring sufficient room is available within the Site boundary for four vehicles to queue inside the Site. A booking system will be utilised by Hi-Quality and truck drivers delivering and removing waste from the Site, to ensure that deliveries and pick-ups are not scheduled when there is not capacity within the Site, which is described in Section 2.5 of the OTMP.

External weighbridge queuing is addressed in Section 6.1 of the ATPIA, where the Proposal Site is described as an [M/M/1] system, “*that is, a single channel, single server system with random arrivals, random service times and a first-come-first-served discipline.*” (Austroads Guide to Traffic Management, Part 2 Section 4.4.1). There is provision for three 19 m vehicles and one 12.5 m heavy rigid vehicle to queue on the Site external to the building (refer to Figure 13 of the ATPIA). For the Proposal Site, the front of each of the two weighbridges are the two control points. The weighbridge system at the Proposal Site is described to automatically permit entry to incoming trucks when either of the weighbridges are empty upon arrival, to reduce standing times of trucks external to the building. Weighbridge service times are on average 60 seconds per vehicle; however, it is acknowledged that at busy times, vehicles may be required to wait outside the building while a vehicle manoeuvres inside the site.

A sensitivity test is provided in Section 6.1 of the ATPIA that demonstrates that for more than three vehicles to be required to wait external to the building to load or unload materials (i.e., the maximum onsite queue length), each vehicle entering the Site would have to be delayed by approximately longer than 25 seconds. The onsite queuing capacity has therefore been deemed to be satisfactory.

A queuing plan that shows the available queuing space for vehicles is provided as Appendix 1 to the OTMP.

4.1.3 Noise and Vibration

Council provided the following feedback on the Proposal regarding noise and vibration impacts arising from construction and operation at the Site:

- The Noise Impact Assessment, included with the EIS, predominantly focussed on the operation of the proposed development. A quantitative assessment must be undertaken for noise impacts associated with construction.
- The Noise Impact Assessment should consider amenity noise levels at neighbouring industrial premises and determine the noise level at the reasonably most-affected point on or within the property boundaries as per Section 2.6 of the NSW EPA’s Noise Policy for Industry (2017).
- A quantitative assessment is also required of potential vibration impacts associated with the construction and operation of the development. In this regard, consideration should be given to potential impacts on cosmetic building damage, structural integrity and human comfort.
- The SEARs require the noise and vibration impact assessment to be undertaken by a suitably qualified person and Council recommends that the consultant be a member of the Australian Acoustical Society or employed by an Association of Australasian Acoustical Consultants (AAAC) member firm.

Response

A Noise and Vibration Assessment (NVA) was undertaken for the EIS and included as Appendix E to the EIS. The NVA included a quantitative assessment of operational noise and a qualitative assessment of construction noise from the Proposal. A Noise and Vibration Impact Assessment (NVIA) (2022) was prepared by EMM Consulting to address the submissions from Council and other stakeholders.

Quantitative assessment of construction noise

The NVIA includes a quantitative assessment of expected construction and operation impacts arising from the Proposal. The NVIA is available as Appendix F to this submissions report.

Quantitative modelling concludes that predicted construction noise levels are expected to comply with relevant Noise Management Levels (NML) at all residential receiver locations during standard construction hours.

Assessment against amenity noise criteria

The NVIA assessment locations have been considered to represent the locations potentially most affected by noise emissions from the Proposal. Compliance of the Proposal with relevant noise goals at these locations would indicate compliant noise level emissions at all other sensitive receptors.

Operational noise levels were predicted to comply with relevant noise targets at all assessment locations during all periods. No exceedances of Operational day, evening, or night 15 minute or 1-hour criteria were predicted at any assessment locations (Table 6-2 of the NVIA).

Vibration impacts

Significant vibration impacts are not anticipated at residential receivers during construction or operation of the Proposal. The NVIA identifies that construction activities at the Proposal Site would not produce significant vibration such as blasting or pile driving. The nearest residential receiver is greater than 350 m from the Site, which is greater than the minimum working distances of 1 to 25 m for cosmetic damage to buildings and 2 to 100 m for human comfort impacts. The NVIA concludes that the Proposal is not anticipated to generate significant vibration impacts off site.

Qualification of persons preparing noise assessment

EMM who prepared the NVIA are a member of the AAAC. The NVIA (2022) was prepared by Jesse Tribby (over 10 years' experience in environmental acoustic assessment) and authorised by Naha Ishac (over 27 years' experience in environmental acoustic assessment and a Member of the Australian Acoustical Society (AAS) since 2005) of EMM.

4.1.4 Air Quality

Council provided the following feedback on the Proposal regarding air quality impacts arising from construction and operation at the Site:

- The report does not include a quantitative assessment of odour impacts and consideration should be given to the technical framework Assessment and Management of Odour from Stationary Sources in NSW published by the Department of Environment and Conservation NSW dated November 2006 and supporting technical notes.

Response

An Revised Air Quality Impact Assessment (AAQIA) has been prepared by Zephyr Environmental to address the additional information requests relating to the Golders Air Quality Impact Assessment, included as Appendix F to the EIS for the Project. The AQIA is available as Appendix E to this submissions report.

Quantitative odour assessment

As stated in Section 10.3.2 of the EIS, contaminated air collected by the HVAC system would be sent for treatment in air emissions control devices prior to discharge to air. The proposed air emissions treatment systems include Particulate Matter (PM) filters and Activated Carbon (AC) filters to remove Volatile Organic Compounds (VOCs) and odour. Air emissions from the WTF will be discharged from three vertical strobic fans at 11.7 m above ground level. Fugitive emissions from the WTF, such as from doorways, would be minimised through the generation of negative pressure by the HVAC system which would be maintained at >-5 Pascals (Pa).

Odour impacts were quantitatively assessed and modelled in Section 7.3 of the AAQIA. The model output determined that there is a very low prediction of odour impacts on sensitive receptors, with all receptors expected to experience less than 2 odour units (OU), within the performance criteria for urban areas.

Mitigation

As described in the Project Description (Appendix B), the mitigation for air quality impacts relating to odour emissions are through the HVAC system engineering and use of particulate matter and activated carbon filters. This is reiterated in Section 8 of this report.

4.1.5 Soils and Contamination

Council have made the following comments regarding soil and contamination investigations made for the Proposal:

- The NSW EPA's Sampling Design Guidelines indicate that between 20 to 21 sampling points would be required as a minimum for site characterisation based on detecting circular hotspots by using a systematic sampling pattern. Golder Associates collected samples from only 6 locations. Council believe the SEARs require characterisation of the nature and extent of any contamination on the site and surrounding area and it is believed that the preliminary nature of the intrusive site investigations do not satisfactorily address the characterisation requirements of the SEARs.

Response

Hi-Quality have considered the existing sampling of soil and contamination investigations to be suitable for the following reasons:

- The Preliminary Site Investigation (PSI) undertaken for the Proposal and included in Appendix G of the EIS concluded that the overall potential for widespread significant soil or groundwater contamination is low, based on the following searches of agency databases:
 - The Site has not been identified as having a notice under the Contaminated Land Management Act (CLM Act) record of notices, nor was it notified under Section 60 of the CLM Act.
 - The Site, or any sites within 500m, has not previously been subjected to a penalty notice under the Protection of the Environment Operations Act (POEO Act).
 - A petrol station currently operates 340 m north of the Site and may be a potential source of soil or groundwater contamination.
 - A Section 10.7 (2) and (5) planning certificate for the Site indicated that Council was not aware that the land is not affected by matters listed in Clause 59(2) of the CLM Act, nor is it subject to a management order, an approved voluntary management proposal, or ongoing maintenance order and Council has not received a Site Audit Statement for the Site.
 - A search of the SafeWork NSW files for records relating to historical storage of hazardous chemicals did not return any results; however, there is still potential that storage of dangerous goods has occurred prior to licensing requirements or has occurred without notification to the regulator.
 - The Department of Defence record search did not identify sites within a 500 m radius that were assessed as part of the Defence 3 Year Contamination Investigation Program. A search of the unexploded ordnance mapping application indicated that the Site was not identified as potentially impacted by unexploded ordnance.
 - Records held on PFAS investigation programs (with information sourced from NSW EPA, Department of Defence and Airservices Australia) did not identify sites within 500 m as being assessed as part of the EPA PFAS Program, the Defence PFAS Program or the Airservices PFAS Program.
- An assessment of the PSI prepared by Golder concluded the following:
 - Golder's site walkover and preliminary site investigation did not identify any areas of potential environmental concern.

- Golder's review of aerial photography identified no potentially contaminating historical site activities prior to development into commercial/industrial land use in the 1990s, with the site being used for grazing until 1991. The site features and layout have not changed since construction.
- The soil boreholes advanced by Golder identified that fill material is present onsite. Based on the soil analytical results, Golder confirmed that the fill material is likely not a source of contamination at the Site.
- Golder concluded that the results of the site investigations indicated that the overall potential for significant widespread soil or groundwater contamination at the site is low. No visual or olfactory evidence of gross contamination was reported by Golder.
- The soil and analytical results did not report contaminants of potential concern above the site assessment criteria in soils at the Site. Golder have therefore surmised that there is no requirement for further analysis of soil contamination at the Site.
- The site walkover undertaken by Golder identified that the Site is currently covered by a concrete hardstand that prevents direct access to onsite soils. This hardstand is planned to remain for the future site development works.
- Golder's assessment was a preliminary assessment, and therefore it is not a requirement that the minimum number of sampling points specified in the Contaminated Land Guidelines are met.
- The Conceptual Site Model developed for the Proposal identified the potential contaminants of concern for the Site were typically associated with uncontrolled filling, agricultural and industrial activities. Potential contaminant migration and exposure pathways included exposure of site workers involved in the construction of the Proposal; however, it was concluded that the overall potential for widespread significant soil or groundwater contamination at the Site is low and the Site is suitable for ongoing commercial / industrial land use. It was concluded that the Site presents a low risk to on-site receptors, including site workers during construction of the Proposal.
- The sampling plan was developed with consideration of the proposed works at the Site and the end use of the Site. It is acknowledged in Section 10.3 of Appendix G of the EIS that the number of sampling locations for the limited detailed site investigation was not in accordance with the sampling density recommended in the Sampling Design Guidelines (EPA, 1995); however the number of investigation locations was considered adequate to provide a preliminary assessment of background contamination levels in soil and groundwater. The limited detailed site investigation undertaken for the Proposal indicated that the risk of contamination was low and all soil and groundwater results were below the limit of reporting (LOR) and adopted site criteria and was therefore not considered to pose an issue to ongoing commercial / industrial land use.
- As described in the Project Description in Appendix B of this submissions report, the proposed WTF is located within an existing shed with hardstand for parking and circulation already present. Only minor soil disturbance is required for building extension and weighbridge installation works, and contaminated soil impacts during construction would be managed through a Construction Environmental Management Plan (CEMP) prepared for the proposed works. The CEMP would include an Unexpected Finds Procedure that would outline the steps to be followed in the event that unexpected contamination is discovered during construction works.

4.1.6 Adequacy of Assessments

Council have made the following comments regarding adequacy of assessments prepared to support the Proposal:

- Recommended that the Department engages a qualified consultant to undertake an independent peer review of the technical reports/EIS.

Response

This comment is noted by Hi-Quality.

4.1.7 Public Health Act 2010

Council requested clarification on whether regulated systems such as warm water and/or cooling water systems will be installed as part of the Project in accordance with the *Public Health Act 2010*, *Public Health Regulation 2012* and *AS 3666 Air-handling and Water Systems of Buildings*.

Response

The HVAC system meets the definition of 'regulated system' under the *Public Health Act 2010* and will be installed and operated in accordance with all applicable regulatory requirements.

4.1.8 Post-Approval Requirements for the Site

Council have made the following comments regarding post-approval requirements for the Site:

- If approval is granted, the consent authority should require routine Independent Environmental Audits.
- Construction and Operational Environmental Management Plans shall be prepared and submitted to the consent authority for review.

Response

This comment is noted by Hi-Quality.

An Operational Environmental Management Plan (OEMP) has been prepared and is available as Appendix C to this submissions report. A CEMP will be prepared and submitted to the Planning Secretary and Council in the nominated timeframe prior to the commencement of any construction works. The development of a CEMP and an OEMP are included as mitigation measures in Section 8 of this submissions report.

4.1.9 Socioeconomic Impact

Council have made the following comments regarding employment opportunities arising from the Proposal:

- Because the proposed development is likely to create up to 48 jobs, it would be beneficial to understand the skills needs of the business in order to assist with workforce development and recruitment of local staff.

Response

Typical skills required by staff at the WTF would include experience and certification in the use of plant and equipment such as front-end loaders, forklifts, shredders, the wastewater treatment equipment, the mobile high sheer mixer, sampling and testing, weighbridge operation, and observation of incoming wastes and verification against a Letter of Approval for waste type, volume, and contaminants.

4.2 Fire and Rescue NSW

A formal submission comprising a letter (dated 28 March 2022) was received from Fire and Rescue NSW. Comments from the submission have been summarised and responded to in the sections below.

4.2.1 Fire safety guidelines

FRNSW request that the fire safety guideline for Fire Safety in Waste Facilities which includes legislated requirements and development considerations (planning) is continued to be utilised and consulted.

Response

Details of the Sites' compliance with the FRNSW *Fire Safety in Waste Facilities* guidelines are provided in the *Fire and Incident Management Assessment*, included as Appendix K of the EIS. The measures identified in the assessment would be addressed during construction and operation of the WTF, in accordance with the mitigation measure outlined in Section 8.

As outlined in Section 8.3 of Appendix K to the EIS, the Proposal will address the requirements and planning considerations outlined in the FRNSW Guidelines for Fire Safety in Waste Facilities. Design development and preparation of construction and operational management plans will consider the FRNSW guidelines, including:

- Construction considerations including Building Code of Australia (BCA) and the National Construction Code (NCC) requirements, as addressed in Appendix K to the EIS
- Fire water runoff containment through the site bunding and leachate system (in the Flooding and Stormwater Management Study – Appendix H of the EIS, and in the Flood Assessment and Stormwater Management memo - Appendix D of this submissions report)
- Firefighting equipment and infrastructure outlined in Section 1.2.1.9 of the Project Description – Appendix B
- Stockpile management protocols which will be outlined in the Waste Management Plan that will form part of the OEMP

Hazardous and flammable materials storage, use and disposal outlined in the OEMP (Appendix C).

4.2.2 Fire vehicle access

FRNSW request that the FRNSW fire safety guideline for Access for fire brigade vehicles and firefighters is continued to be utilised and consulted.

Response

As described in Section 2.7 of the site OEMP (Appendix C), Hi-Quality will continue to maintain suitable access for emergency services vehicles and personnel at the Site in accordance with the FRNSW guidelines.

4.2.3 Emergency response plan

FRNSW request that a comprehensive emergency response plan is developed for the site in accordance with HIPAP No.1.

Response

Emergency response procedures are outlined in Appendix C of the OEMP for the Site, available as Appendix C. Additionally, a Pollution Incident Response Management Plan (PIRMP) will be prepared for the Site, as required by the NSW EPA to obtain an Environment Protection Licence for the Site. The PIRMP will be published once prepared and will be reviewed yearly.

4.2.4 Emergency services information package

FRNSW request that an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline –Emergency services information package and tactical fire plans.

Response

An ESIP would be prepared for the WTF Site in accordance with relevant FRNSW guidelines and is included as a mitigation measures in Section 8.

4.3 NSW Environment Protection Authority

A formal submission comprising a letter (dated 14 January 2022) was received from NSW EPA. Comments from the submission has been summarised and responded to in the sections below.

4.3.1 Inconsistencies in the EIS

The EPA recommends that the EIS be updated to address the inconsistencies throughout the EIS such as:

- Industry recognised timeframes for bioremediation to be completed must be included
- Inconsistencies such as bioremediation for chlorinated compounds must be addressed
- Only wastes suitable for bioremediation should be included in Table 1 – (NSW EPA Waste Codes – Proposed to be Treated)
- The proposed immobilisation using chemical oxidation and mechanical mixing with an excavator be reviewed in accordance with the EPAs Immobilisation Technical Note 1 - Process Equipment for Treatment of Contaminated Soil and Sludge Waste
- Demonstration that the proposed 24-48 hours of curing will be sufficient for the types of media to be oxidised

Response

The Project Description, included as Appendix B, describes the management of soils, including bioremediation in Section 1.4.6.2 and will be compliant with the industry recognised timeframes for bioremediation. The Project Description has also been updated to clarify the processes by which immobilisation will be achieved using chemical oxidation and mechanical mixing and has been updated with the proposed equipment to be used for each activity.

The updated Waste Table for the Proposal is available as Annexure A to Appendix C of this submissions report and defines the waste material to be treated via bioremediation.

A Waste Management Plan (WMP) will be prepared for the Site which will provide specific details on waste management and will prescribe handling / aeration timeframes and sampling and analysis program including remediation target levels and predicted timeframes for completion of the bioremediation process.

Timeframes for bioremediation treatment will largely be dependent on contaminant load, contaminant of concern and other environmental factors. A commitment to a set timeframe for treatment via bioremediation is not proposed, rather the completion of treatment will be validated through laboratory testing to confirm suitable thresholds of contaminant load has been achieved. The Site will manage wastes to be treated via bioremediation through onsite volume limits. Hi-Quality will not accept additional wastes for treatment via bioremediation until any existing materials have been treated, validated, and removed from Site for disposal.

Similarly, for material to be treated by chemical oxidation, the curing time will be dependent on density of materials, which contaminant and co-contaminants are present and their concentration levels, the treatment

target and other environmental factors. The validation testing of treated material would determine the completion of treatment, and volumes of materials to be treated via this methodology is limited to the onsite storage limit (defined in Section 1.4.5 of the Project Description).

4.3.2 Validation, sampling, approval and verification of treatment performance

The EPA recommends that the following information be provided:

Supporting evidence that the proposed treatment technologies can be applied at the facility taking into consideration:

- The contaminants of concern,
- Treatment stoichiometry,
- Constraints of facility including but not limited to the size and time for treatment/storage,
- Available treatment technology, emissions and the disposal/reuse criteria
- The number of samples to be taken for post-treatment validation, the suite of analytes that will be tested for and the validation process proposed to be adopted

Response

The Specific Immobilisation Approvals that Hi-Quality will apply for prior to Site operation would include the details requested by NSW EPA.

4.3.3 Specific contingency measures for each waste type

The EPA recommends that the EIS include specific contingency measures provided for each waste type proposed to be treated at the facility including:

- Providing examples and adopting recognised industry standards for the timeframes required for treatment and;
- Contingencies for each waste type in Table 1 (NSW Waste Codes proposed to be treated) in the event that they are not successfully treated
- Develop an unexpected finds process should be included in the EIS.

Response

Adoption of recognised industry standards and timeframes will be included in the site WMP that will be prepared and submitted to the Planning Secretary and the EPA prior to operation of the WTF.

Contingencies for waste types have been provided in Section 1.4.10 of the updated Project Description (Appendix B)

An unexpected finds process has been developed and is available in the site OEMP (Appendix C).

4.3.4 PFAS contaminated soil and asbestos

The EPA recommends that wastes such as Asbestos and PFAS should be disposed of directly to a facility that can lawfully accept them. This reduces the risk attributed to additional handling of these wastes.

Response

Asbestos containing materials would not be accepted at the Site (refer to Section 1.4.2 of the updated Project Description chapter – Appendix B). The OEMP contains an unexpected asbestos finds procedure in Appendix D.

PFAS contaminated soil would only be accepted at the Site for temporary storage, in a dedicated PFAS soil storage area, and would be transported to an offsite interstate licensed treatment and disposal facility (refer to Waste Table – Annexure A of Appendix B).

4.3.5 Waste classification

The EPA requires that all wastes must be classified in accordance with the EPA's Waste Classification Guidelines.

Response

As described in Section 1.4.4 of the Project Description, included as Appendix B, only wastes that have been characterised in accordance with the EPA's Waste Classification Guidelines would be granted pre-approval to be brought to site. Classification of waste (through NATA lab results) to be received at the site is a pre-requisite for a waste generator to satisfy before a Letter of Approval is issued by Hi-Quality, prior to receipt on site. This is also verified by additional verification testing. Verification testing would also be undertaken on Site to confirm material properties.

Refer to Section 1.4.4 of the updated Project Description chapter – Appendix B.

4.3.6 Specific immobilisation approvals

The EPA requires the proponent to apply for SIAs in accordance with the EPA's immobilisation approval framework.

Response

Hi-Quality intends to apply for Specific Immobilisation Approvals in accordance with the EPA's immobilisation approval framework.

4.3.7 Air and Odour

4.3.7.1 AQIA predicted exceedances of impact assessment criteria

The EPA recommends that the AQIA be revised to:

- Robustly demonstrate that principal air toxics have been minimised to the maximum extent achievable
- Demonstrate compliance with the impact assessment criteria for arsenic and chromium. A review of assumptions made in the assessment could be considered, provided that principal air toxics have been minimised to the maximum extent achievable. Any revised assumptions must be robustly justified with supporting information and/or evidence

Response

The AAQIA prepared by Zephyr Environmental (Appendix E) addresses minimisation of air toxics through the new HVAC system in Section 6 and demonstrates compliance with impact assessment criteria for arsenic and chromium in Table 7-2 in Section 7.2 of the AAQIA (2022). The table identifies predicted concentrations of arsenic and chromium to be well below the criterion established in the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (EPA, 2022).

4.3.7.2 AQIA information on ventilation and emissions control system

Revise the AQIA to provide clarification and supporting documentation on the proposed ventilation system design, and update the AQIA to ensure the assessment is based on the actual proposed design for the ventilation and emission control system

4.3.7.2.1 Ventilation flow rates

The EPA recommends that the AQIA be revised to provide further clarification on the proposed ventilation system design and revise the assessment to be based on the actual proposed design for the ventilation and emission control system.

Response

The AAQIA (2022) identified the ventilation flow rates for the proposed HVAC system as 17.5 metres per second (m/s) in Section 6. The updated assessment presented in the AAQIA (2022) used this ventilation flow rate in the modelled outcomes.

4.3.7.2.2 Discharge velocities

The EPA recommends that the AQIA be revised to adopt discharge velocities that are representative of the proposed ventilation system. Velocities must be robustly justified to demonstrate they are representative to the proposed ventilation system.

Response

The AAQIA (2022) confirms the maximum air exchange through the system will be 52.6 m³/s, vented from the building through the three strobic fans. This equates to a discharge velocity of the HVAC system as 25 m/s (see Section 6 of Appendix E). Updated modelling with the revised discharge velocity is presented in the AAQIA (2022) (Appendix E)

4.3.7.3 AQIA compliance with the Clean Air Regulation

The EPA recommends that the AQIA be revised to demonstrate that compliance with the Regulation can be achieved.

Response

The Protection of the Environment Operations (Clean Air) Regulation (2021) (POEO (Clean Air) Regulation) refers to in-stack concentration limits for Type 1 and Type 2 substances listed under Part 7, Schedule 4 of the Regulation. The AAQIA (Appendix F of this submissions report) confirms compliance with the in-stack concentration limits of arsenic, chromium and lead in Table 6-1 of Section 6 of the report. The post-filtration concentration for arsenic is 0.00125 mg/m³, for chromium is 0.0125 mg/m³, and for lead 0.00125 mg/m³, which are well below the in-stack concentration limit of 1 mg/m³ prescribed under the POEO (Clean Air) Regulation.

4.3.8 Noise Impact

4.3.8.1 NIA inadequacy

The EPA recommends that the following additional information should be included in the NIA:

- The sound power levels of the noise sources within the building
- Transmission loss of the building façade elements including doors

Response

An NVIA was prepared by EMM Consulting in September 2022 to address comments by stakeholders and provide additional information to support the Proposal. The NVIA (2022) is available as Appendix F.

Sound power levels

The sound power levels of noise sources within the building are provided in:

- Table 5-1 of Section 5.1 of the NVIA (2022) for construction,
- Section 5.2 for operations (Table 5-2 for day operations, Table 5-3 for evening and night operations), and
- Table 5-4 of Section 5.3 for sleep disturbance.

Sound power levels have been included for noise sources operating inside and outside of the WTF building.

Transmission loss

Transmission loss has been included in Section 3.2.2 of the NVIA (2022). Transmission loss is measured through the weighted sound reduction index, or R_w value. A high R_w value indicates a higher expected sound transmission loss, with a lower value indicating lower sound transmission loss.

The transmission of internal noise through the existing cement walls of the facility (having a R_w value, of 55 or more) was considered insignificant when compared to transmission of internal noise through the existing metal cladding roof (a R_w value of 20).

Operationally, the roller shutter doors of the building will be closed most of the day, but at times will open to allow vehicles to enter and exit. Conservatively, the NVIA assumes that internal noise will transmit through the roof and one open roller door at any given time. A correction of minus 10 dB has been applied to internal noise transmitting through the open roller shutter door to the outside environment.

4.3.8.2 NIA software package and propagation method

The EPA recommends that the NIA is reviewed and updated to clarify the software package and propagation method used and to provide all the relevant meteorological parameters for each scenario.

Response

The NVIA (2022) used the iNoise software package, which was created by the same developers of B&Ks Predictor software.

Noise predictions were based on ISO9613 calculation method of propagation utilising third-octave data inputs and results. Further detail on the software and propagation method can be found in Section 3.2.1 of the NVIA (2022).

4.3.8.3 NIA modelling elements

The EPA recommends that the NIA is updated to contain the elements that have been included in the modelling with:

- Diagrams that clearly show what elements, such as ground topography, buildings, barriers, noise sources (including their heights), receivers, etc are in place for each modelled scenario

Response

Appendix D of the NVIA (2022) provides the model diagrams of elements included in noise modelling, such as landform contours and the building heights for surrounding industrial area.

4.3.8.4 NIA meteorological and background noise data

The EPA recommends that the NIA is updated to include an appendix containing the daily charts of the background noise monitoring data captured including accompanying meteorological data.

Response

The daily charts of background noise monitoring data (with accompanying meteorological data) are available in Appendix A of the NVIA (2022).

4.3.8.5 NIA assumed truck volumes and time distributions

The EPA recommends that the NIA is reviewed to revise the anticipated truck volumes and time distributions assumed in the NIA to revise the predicted impacts as necessary to ensure a 'reasonable worst case' scenario has been considered.

Response

Section 5.4 of the NVIA (2022) addresses the road traffic noise parameters in accordance with the latest truck volumes as identified in the Addendum Traffic Impact Assessment prepared by Stanbury Traffic Planning for this submissions report (Appendix G).

As noted in Section 5.4 of the NVIA (2022) the TIAA (2022) identified a worst-case scenario of 22 additional truck movements per hour during the day period (3-4PM), for a total of 62 truck movements. This has been modelled along Whyalla Place and Jedda Road to/from the M7.

Section 6.5 of the NVIA (2022) provides the predicted road traffic noise levels, derived from the updated truck volumes and time distributions.

4.3.8.6 NIA sleep disturbance assessment

The EPA recommends that the NIA is updated to include an assessment of sleep disturbance impacts from on-site operations in accordance with Section 2.5 of the EPAs Noise Policy for Industry guidance

Response

The sleep disturbance noise criteria used in the NVIA (2022) is provided in Section 4.4 of the report, with a maximum L_{AEmax} of 60 dBA.

The sound power level for road truck airbrake release was at its worst-case scenario 127 dBA, with no exceedances predicted for any sensitive receivers (Section 6.4 of the NVIA (2022)).

4.3.8.7 NIA construction noise impacts

The EPA recommends that the NIA include a quantitative assessment of construction noise impacts to surrounding sensitive receivers in accordance with the Interim Construction Noise Guideline that details:

- All feasible and reasonable noise mitigation and management measures that will be implemented to minimise construction noise impacts.

Response

The NVIA (2022) provides a quantitative assessment of construction noise impacts (using the ICNG) in Section 6.1.

The results of the assessment concluded no predicted exceedances of noise management levels at any receiver during standard construction hours. No out of hours construction activities are proposed.

Resultingly, no further mitigation measures (other than best practice) for construction are proposed.

4.3.8.8 NIA modifying factor corrections

The EPA recommends that the NIA is updated to include a quantitative assessment of any modifying factor corrections (e.g. Low frequency or tonal noise) are applicable to on site activities in accordance with Fact Sheet C of the EPAs Noise Policy for Industry guidance.

Response

The NVIA (2022) includes a quantitative assessment of modifying factor corrections in Section 3.3.

When possible, third-octave sound power data has been utilised in operational noise modelling to allow for assessment of tonality and low-frequency modifying factors.

Intermittency modifying factors are unlikely to be applicable to the Proposal as all noise sources are either continuous or events.

4.4 Transport for NSW

Transport for NSW (TfNSW) provided the following feedback on the Proposal regarding local traffic and intersection modelling and operational traffic management at the Site.

4.4.1 Traffic and transport

Future year traffic modelling

It is not clear what future year has been modelled in the SIDRA analysis. Normally year 2026 scenario (future 5 year case) are required to be modelled. The traffic report seems to include SIDRA output for existing scenario only. TfNSW requests the SIDRA outputs for future year and post development scenario to be included in the report for review.

Response

The ATPIA prepared for this RTS report has been updated (January 2023) to include modelling for the 2026 scenario, which is available in Section 4 of the ATPIA. The modelling undertaken for the EIS was updated using Sidra Intersection 9 (updated from Sidra Intersection 8) and took into account the following changes in the road network:

- The junction of Jedda Road /Whyalla Place was updated with the southern approach from the Hanson site, as described in Section 4.1.2
- The junction of Hoxton Park Road and Joadja Road was updated to reflect the double right-turn lane that has been installed since the EIS assessment.

The analysis included a review of TfNSW permanent traffic count data at the Hume Highway 150m north of Kendall Drive in Casula (number 62001). While there were closer counters to the Proposal Site, the data recorded was insufficient. A summary of weekday AM and PM peak periods (excluding public and school holidays) is provided in Table 4-4.

Table 4-3: Permanent count data summary

Year	Average Southbound		Average Northbound	
	7am to 9am	3pm to 5pm	7am to 9am	3pm to 5pm
2016	2,555	4,362	3,127	3,132

2017	2,579	4,519	3,269	3,265
2018	2,667	4,726	3,514	3,437
2019	2,659	4,729	3,537	3,383
2019-2016	1.04	1.08	1.13	1.08
Average growth rate	1.0%	2.1%	3.3%	2.0%

A growth rate of 2% per annum was selected for all movements except into and out of Ash Road (south of Jedda Road) and Whyalla Place. No growth was added to these movements as they do not carry any through movements.

The data previously collected by PeopleTrans in 2020 has been increased by 12% to represent 2026 future base traffic volumes. The data collected by Stanbury Traffic Planning in 2022 for the intersection of Jedda Road and Whyalla Place was increased by 8%. The 2026 traffic volumes are shown in Figure 6 (AM peak) and Figure 7 (PM peak) (future base scenario) and Figure 8 (AM peak) and Figure 9 (PM peak) (future post development scenario) in the ATPIA.

A summary of the SIDRA modelling results of the intersection of Jedda Road / Whyalla Place is provided in Table 4-4, and for the intersection of Jedda Road / Joadja Road is provided in Table 4-5.

Table 4-4: SIDRA model results for 2026 future base and post development scenarios at Jedda Road / Whyalla Place

Intersection of Jedda Road / Whyalla Place / Hanson Concrete	2026 Future base		2026 Post development	
	AM	PM	AM	PM
Hanson driveway South approach				
<i>Delay (seconds/vehicle)</i>	125.1 (W)	101.1 (W)	125.1 (W)	119.3 (W)
<i>Degree of saturation</i>	0.119 (W)	0.329 (W)	0.119 (W)	0.371 (W)
<i>Level of service</i>	F (W)	F (W)	F (W)	F (W)
<i>95th percentile queue</i>	4.7 m	11.8 m	4.7 m	13.6 m
Jedda Road East approach				
<i>Delay (seconds/vehicle)</i>	11.5 (W)	10.2 (W)	11.5 (W)	10.4 (W)
<i>Degree of saturation</i>	0.289 (W)	0.366 (W)	0.289 (W)	0.37 (W)
<i>Level of service</i>	A (W)	A (W)	A (W)	A (W)
<i>95th percentile queue</i>	13.1 m	11.7 m	13.1 m	12.4 m
Whyalla Place North approach				
<i>Delay (seconds/vehicle)</i>	46 (W)	37.8 (W)	52.1 (W)	51.9 (W)
<i>Degree of saturation</i>	0.432 (W)	0.343 (W)	0.497 (W)	0.565 (W)
<i>Level of service</i>	D (W)	C (W)	D (W)	D (W)
<i>95th percentile queue</i>	12.9 m	8.5 m	15.8 m	16.5 m

Intersection of Jedda Road / Whyalla Place / Hanson Concrete	2026 Future base		2026 Post development	
	AM	PM	AM	PM
Jedda Road West approach				
<i>Delay (seconds/vehicle)</i>	14.4 (W)	11 (W)	14.4 (W)	11.1 (W)
<i>Degree of saturation</i>	0.65 (W)	0.251 (W)	0.65 (W)	0.258 (W)
<i>Level of service</i>	A (W)	A (W)	A (W)	A (W)
<i>95th percentile queue</i>	0.4 m	0.2 m	0.4 m	0.2 m
Total intersection				
<i>Delay (seconds/vehicle)</i>	125.1 (W)	101.1 (W)	125.1 (W)	119.3 (W)
<i>Degree of saturation</i>	0.119 (W)	0.329 (W)	0.119 (W)	0.371 (W)
<i>Level of service</i>	F (W)	F (W)	F (W)	F (W)
<i>95th percentile queue</i>	13.1 m	11.8 m	15.8 m	16.5 m

Note: (W) denotes worst movement, as required by the NSW Traffic Modelling Guidelines 2013

The intersection of Jedda Road and Whyalla Place is expected to operate at a Level of Service (LoS) F during both the future base and future post development scenarios, with the poor LoS due to delays experienced by vehicles exiting the Hanson driveway. Despite the poor LoS, the modelling indicates the southern approach would retain spare capacity with a Degree of Saturation (DoS) of 0.119 during the AM peak and 0.371 during the PM peak.

The LoS of the northern approach would remain the same during the weekday AM peak hours post development (LoS D). The PM peak hour would see a deterioration of LoS from C in the future base to D in the future, post development scenario. However, the DoS would increase from 0.343 to 0.565, indicating substantial spare capacity at this intersection approach.

Table 4-5: SIDRA model results for 2026 future base and post development scenarios at Jedda Road / Joadja Road

Intersection of Jedda Road / Joadja Road	2026 Future base		2026 Post development	
	AM	PM	AM	PM
Jedda Road South-East approach				
<i>Delay (seconds/vehicle)</i>	17.4	24.6	17.3	25.1
<i>Degree of saturation</i>	0.481	0.870	0.481	0.886
<i>Level of service</i>	B	B	B	B
<i>95th percentile queue</i>	42.8 m	83.9 m	43.6 m	87.7 m
Joadja Road North-East approach				
<i>Delay (seconds/vehicle)</i>	76.0	31.1	76.0	31.4
<i>Degree of saturation</i>	1.019	0.867	1.019	0.870
<i>Level of service</i>	F	C	F	C

Intersection of Jedda Road / Joadja Road	2026 Future base		2026 Post development	
	AM	PM	AM	PM
<i>95th percentile queue</i>	157.1 m	129.6 m	157.1 m	130.7 m
Liverpool transmission substation North-West approach				
<i>Delay (seconds/vehicle)</i>	27.7	27.2	27.7	27.2
<i>Degree of saturation</i>	0.017	0.014	0.017	0.014
<i>Level of service</i>	B	B	B	B
<i>95th percentile queue</i>	0.6 m	0.6 m	0.6 m	0.6 m
Jedda Road South-West approach				
<i>Delay (seconds/vehicle)</i>	14.9	11.2	14.9	11.6
<i>Degree of saturation</i>	0.896	0.660	0.896	0.691
<i>Level of service</i>	B	A	B	A
<i>95th percentile queue</i>	152.7 m	64.5 m	152.7 m	69.2 m
Total intersection				
<i>Delay (seconds/vehicle)</i>	30.0	21.8	30.0	22.2
<i>Degree of saturation</i>	1.019	0.870	1.019	0.886
<i>Level of service</i>	C	B	C	B
<i>95th percentile queue</i>	157.1 m	129.6 m	157.1 m	130.7 m

The Jedda Road and Joadja Road intersection is expected to operate at the same LoS in both the 2026 future base and 2026 post development scenarios.

Joadja Road and Jedda Road queue lengths

The future SIDRA model shows the right turn bay (south-western end) at the intersection of Joadja Road / Jedda Road queuing out to a total of 123m (AM peak), which overflows into the through traffic and impacts the overall efficiency of this approach to the signals. TfNSW requests the applicant to investigate the feasibility of extending the right turn bay on this approach to cover the projected queue lengths.

Response

Further modelling has been carried out to assess the potential impacts of the Proposal on the Joadja Road and Jedda Road intersection. The modelling shows that the queue lengths for the right turn from Jedda Road (south-west) to Jedda Road (south east) indicates the following:

- 2026 Future Base AM peak hour – 152.7m;
- 2026 Post Development AM peak hour – 152.7m (no change);
- 2026 Future Base PM peak hour – 64.5m; and
- 2026 Post Development AM peak hour – 69.2m (+4.7m).

The ATPIA investigated the extension of the right turn bay and although it appears that with a line marking adjustment, the right turn lane could potentially be extended, based on the modelling results in Table 4-5 no

changes are considered necessary to accommodate the minimal increase in traffic (0.6% in the AM peak and 0.9% in the PM peak) attributable to the Proposal.

Hoxton Park Road / Joadja Road queue lengths

The future SIDRA model shows the dual right turn bay at the intersection of Hoxton Park Road / Joadja Road extending out to 203m (PM peak), this effectively queues out into the intersection of Hoxton Park Road / Banks Road. No mitigation options have been investigated with respect to this issue.

Response

When the traffic modelling was prepared for the EIS there was a single right-turn lane from Hoxton Park Road to Joadja Road. The intersection has been upgraded to include two right-turn lanes. The ATPIA has been updated to include traffic modelling for the junction of Hoxton Park Road and Joadja Road, which is available in Section 4.3.3 of the ATPIA. The SIDRA modelling output for the intersection is summarised in Table 4-6.

Table 4-6: SIDRA model results for 2026 future base and post development scenarios at Hoxton Park Road / Joadja Road

Intersection of Hoxton Park Road / Joadja Road	2026 Future base		2026 Post development	
	AM	PM	AM	PM
Joadja Road South approach				
<i>Delay (seconds/vehicle)</i>	25.2	105.2	25.2	106.3
<i>Degree of saturation</i>	0.729	1.048	0.729	1.050
<i>Level of service</i>	B	F	B	F
<i>95th percentile queue</i>	173.2 m	359 m	173.2 m	359 m
Hoxton Park Road East approach				
<i>Delay (seconds/vehicle)</i>	27.0	9.9	27.0	8.6
<i>Degree of saturation</i>	0.584	0.712	0.584	0.712
<i>Level of service</i>	B	A	B	A
<i>95th percentile queue</i>	118 m	145.4 m	118 m	138.7 m
Hoxton Park Road West approach				
<i>Delay (seconds/vehicle)</i>	22.9	22.6	22.9	22.7
<i>Degree of saturation</i>	0.603	0.709	0.603	0.711
<i>Level of service</i>	B	B	B	B
<i>95th percentile queue</i>	149.1 m	114.4 m	149.1 m	114.7 m
Total intersection				
<i>Delay (seconds/vehicle)</i>	24.6	36.8	24.6	36.6
<i>Degree of saturation</i>	0.729	1.048	0.729	1.050
<i>Level of service</i>	B	C	B	C
<i>95th percentile queue</i>	173.2 m	359 m	173.2 m	359 m

The model output indicates that the junction of Hoxton Park Road and Joadja Road would operate at the same LoS in the 2026 future base and 2026 post development scenarios. Based on the results of the modelling, the addition of one light vehicle turning right during the weekday PM peak hour that is associated with the development would have a negligible impact on the right turn. As a result, no mitigation measures have been proposed.

4.5 Environment, Energy and Science Group

4.5.1 Biodiversity

Environment, Energy and Science Group (EES) comment regarding a waiver for the requirement to submit a biodiversity development assessment report being obtained and granted on 11 November 2020 is noted.

4.5.2 Flood Risk

EES notes that the Site is in the Cabramatta Creek Catchment, approximately 300m west of Maxwells Creek, a major tributary of Cabramatta Creek. Liverpool Council flood studies and the EIS' flooding and stormwater management study indicate that the Site is located within the low flood risk precinct and would not be impacted by flooding events up to 1% AEP.

The carpark of the development site is expected to have a floodwater depth of 1-2m under the probable maximum flood (PMF) event. The exit routes from the site, Hoxton Park Road and Jedda Road, would be disconnected under the PMF event and likely be isolated for approximately two hours when the provision for emergency services would not be available.

The proposal should include shelter-in-place arrangements along with emergency backups at the proposed waste treatment facility to mitigate any adverse work, health and safety risks during the major flooding events including the PMF event.

Response

As outlined in Section 4.1.1 a Flooding and Stormwater Management Study was prepared by Golder Associates in June 2020 (Appendix H to the EIS), which is summarised in Section 11.0 of the EIS. The model showed that the development had no impact on flooding within the Site and on downstream areas. The model also concluded fluvial flooding impacts would only occur at the Site during a PMF event.

A technical memo addressing flood conditions at the Site has been prepared by Arcadis for the WTF to provide further clarification on the potential flooding impacts and management approach, which also includes a proposed stormwater management strategy. The flood memo is available as Appendix D to this submissions report.

The updated modelling showed that during the PMF event an overland flow path forms along Whyalla Place, draining to the north. The peak flood depths within the Site are generally 1.00m to 1.25m deep. Peak flood depths along Whyalla Place are deeper than the Site reaching 1.6m at the northern boundary of the Site. Within the Site the depth velocity product is less than 1 m²/s and is considered a low hazard risk to structures. The proposed redevelopment of the Site does not significantly alter the available flood storage or overland flow paths within or surrounding the Site. As such, the proposed redevelopment does not significantly impact the flood behaviour (peak flood levels or flow velocities) within or surrounding the Site (refer to Figures A1 to B2 of Appendix D).

Flood hazard is a function of depth and velocity and the hazardous conditions a flood creates are therefore classified based on the peak flow depths and flow velocities experienced. The flood hazard experience on Site during the PMF event has been defined as H3, based on the Australian Institute of Disaster Resilience general flood hazard classification, being '*unsafe for vehicles, children and the elderly*'. Under these conditions the Site is considered a low hazard to adults. The flood hazard increases along the Site boundary with Whyalla Place. Along Whyalla Place the flood hazard increases to H5 classification which is considered '*unsafe for vehicles and all people*'.

As noted in the Golders report (Appendix H to the EIS), the Site is not inundated in the 9-hour 1%, 0.5%, and 0.2% AEP flood events, however local roads would be inundated in these scenarios and access to the Site would be limited or not available. A shelter-in-place strategy is therefore proposed for the Site during flood events, where personnel seek refuge in the existing second level office space, which is above the PMF level. Flood emergency management will be incorporated into the Emergency Management Plan to be prepared for the Site.

Updated Mitigation Measures

The following mitigation measures have been included in Section 8:

- Any extension to the existing buildings or modifications of the Site fences/exterior walls below the PMF level will be constructed with flood compatible building components. An engineer's report will be provided demonstrating extensions and site fences / exterior walls can withstand the forces of floodwater, debris and buoyancy up to and including the PMF level.
- Any on-site parking will be located above the 1% AEP flood level of 23.1m AHD.
- Flood emergency management will be incorporated into the Emergency Management Plan for the Site and will include a shelter-in-place strategy during flood events.

4.6 Sydney Water

A formal submission comprising a letter (dated 18 January 2022) was received from Sydney Water. Comments from the submission have been summarised and responded to in the sections below.

4.6.1 Water and wastewater servicing

Due to the extent of the development and the significant proposed trade waste discharge to Sydney Water's wastewater network, Sydney Water recommends a feasibility application be lodged to determine early requirements. This would include an understanding any drinking water and process water demands as well as an indication of wastewater discharge.

Response

As described in the updated Project Description chapter (Appendix B), during Stage 1 operations, leachate would be collected in 50KL temporary holding tanks, with PFAS leachate to be stored in a separate tank. A connection to sewer would be installed only following successful application for a trade wastewater licence from Sydney Water. Wastewater would only be discharged to sewer should the collected leachate meet the requirements of the trade wastewater licence. Until successful application for a Trade Waste Agreement leachate would be tankered offsite for disposal at an appropriately licenced site.

During Stage 2 operations 70 ML of liquid waste would be treated and disposed of to sewer, in accordance with a Sydney Water Trade Waste Agreement.

The Applicant will consult with Sydney Water's Water Servicing Coordinator and lodge a feasibility application during detailed design of the Proposal.

Updated Mitigation Measures

The following mitigation measure has been included in Section 8:

- MW11: A feasibility application will be lodged with Sydney Water during detailed design that will detail the indicative water usage and wastewater discharge for the Proposal.

4.6.2 Approvals and recommendations

Sydney Water highlighted a range of additional approvals and recommendations for the Proposal, including the need to:

- Obtain a Section 73 Compliance Certificate
- Seek Building Plan Approval and/or Out of Scope Building Plan Approval
- Consider potential activities impacting Sydney Water assets in line with *Technical guidelines – Building over and adjacent to pipe assets*, including tree planting, as relevant
- Ensure a Trade Waste Agreement is in place in order to discharge to Sydney Water's sewerage system
- Consider backflow prevention, water efficiency and contingency plan requirements and recommendations, as relevant.

Response

As described in Section 5.5 of the EIS, the Applicant commenced consultation with Sydney Water regarding the Trade Waste Application in September 2020. The Applicant is committed to ongoing consultation with Sydney Water throughout the design and construction of the Proposal to ensure all relevant approvals are obtained and recommendations are considered as relevant to the Proposal. Consultation will be carried out in accordance with the Stakeholder Engagement Strategy (mitigation measure SC1) and a feasibility application will be lodged with Sydney Water during detailed design of the Proposal (mitigation measure MW11).

The updated Project Description chapter (Appendix B) acknowledges that Sydney Water will require a Compliance Certificate under Section 73 of the Sydney Water Act. Detailed design will be progressed in consideration of Sydney Water's guidelines and requirements and recommendations from the feasibility application (environmental management measure MW11).

5 RESPONSE TO COMMUNITY SUBMISSIONS

This section provides a summary of the submissions raised by public stakeholders, including organisations and members of the community. As described in Section 3, submissions have been grouped and responded to by key environmental aspects and issues. Responses to community submissions are provided in Table 5-1.

Table 5-1: Response to community submissions

Aspect	Issue	Submission #	Issue summary	Response	Reference
Scoping report	Preliminary risk assessment	18	Queried the preliminary risk ratings allocated to environmental aspects and raised concern about the level of risk associated with the Proposal	<p>The scoping report (Golder, 2020) included a preliminary environmental risk analysis which identified unmitigated risk ratings for environmental aspects based upon the likelihood and consequence of potential adverse impacts. This assisted in the identification of key issues for the Proposal.</p> <p>A more detailed environmental risk assessment was undertaken for the EIS in accordance with the SEARs, as detailed in Chapter 6 of the EIS. It is noted that the mitigated risks for the Proposal were assessed to be very low to negligible with the application of the environmental management measures, which have been further refined in Section 8.</p>	Chapter 6 of the EIS
Project description	Operational hours	1	Queried the operational hours of the Proposal	<p>As stated in Section 2.23.1 of the EIS, the Proposal would receive waste 24 hours a day. Processing and dispatch of waste would be undertaken between 7am and 6pm, Monday to Saturday and 8am to 6pm on Sundays and Public Holidays.</p> <p>This is re-stated in Section 1.4.16 of the updated Project Description, included as Appendix B of this submissions report.</p>	Chapter 2 of the EIS Section 1.4.16 of Appendix B of this report

Aspect	Issue	Submission #	Issue summary	Response	Reference
	Scale of Proposal	15	<p>Concern raised over the scale of the Proposal.</p> <p>A comparison was made to the Cleanaway facility in Olympic Park, noting that it is authorised to discharge up to 20 ML per year of treated effluent annum.</p>	<p>As stated in Chapter 2 of the EIS, the Proposal would accept and process up to 270,000 tpa of contaminated solids, liquid and contaminated sludges. Approximately 70 ML of liquid waste would comprise a portion of the total Stage 2 throughput, which would be treated and disposed of to sewer in accordance with a Sydney Water Trade Waste Agreement.</p> <p>The Proposal would provide an important centralised location for the receipt and treatment of liquid waste (including industrial wastewater and contaminated water). There are currently limited facilities within the Sydney basin licenced to accept this waste stream. The Proposal would provide a safe, best practice location of wastewater to be receive, treated and responsibility disposed of.</p> <p>A revised Proposal description has been prepared for the Proposal (Appendix B of this report). Section 1.4.6.4 of the revised Proposal description provides a detailed description of the nature of liquid waste to be received, how it would be treated and the volume to be discharged to sewer.</p>	Chapter 2 of the EIS Section 1.4.6.1 of Project Description - Appendix B
Justification and strategic need	Site selection and alternatives considered	8, 9, 18	Queried the selection of the Proposal Site for the location of the Proposal	<p>The location of the Proposal has been selected to provide access via existing and future State roads, on mapped B-double routes and due to its location on land zoned IN3 Heavy Industry. As described in Chapter 3 of the EIS, the Site is located in proximity to the M7 Motorway and the future M12 Motorway and would provide opportunities for greater localised precinct-wide waste processing capacity to promote more efficient waste processing and opportunities for re-use, in accordance with State and regional planning policies.</p> <p>The objectives of the IN3 Heavy Industrial zone centre around the need to provide suitable areas for those industries</p>	Chapter 3 of the EIS

Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>that need to be separated from other land uses. Given the nature of the Proposal, the Proposal Site's location within IN3 zoning is considered most appropriate. It is noted that there is currently limited IN3 zoned land across the entire Sydney region (only four locations). In addition to the need to be located in appropriately zoned land, the Proposal requires appropriate land area, appropriate existing onsite infrastructure and appropriate access to the arterial road network.</p> <p>The Proposal Site therefore represents a uniquely suitable location for the Proposal.</p>	
Site description	Surrounding land use	4, 16	Concern that the Proposal Site is located in proximity to residential areas.	<p>The Proposal Site is located 500 m south of the nearest residents, which are to the north of Hoxton Park Road. This distance provides adequate separation from the Proposal and residential areas, and the Proposal Site is suitable for the location as:</p> <ul style="list-style-type: none"> • The Proposal Site is zoned IN3 Heavy Industrial under the <i>Liverpool Local Environment Plan 2008</i> (Liverpool LEP). The objectives of the zone are to provide suitable areas for heavy industries (such as the Proposal) that require separation from other land uses, such as residential development. • As described in Chapter 12 and Appendix I (SEPP 33 Preliminary Risk Screening) of the EIS, the Proposal is not considered a potentially hazardous development under the <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (formerly SEPP 33). • The human health risk assessment, summarised in Chapter 13 and included as Appendix J of the EIS, 	<p>Chapter 4 of the EIS Chapter 12 of the EIS Appendix I of the EIS Chapter 13 of the EIS Appendix J of the EIS</p>

Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>concluded that, with the implementation of the design and management measures identified in the EIS the potential for community exposure to contaminants from the Proposal Site is unlikely and the community health risks are low.</p>	
		10, 11, 12, 13, 14, 18	<p>Concern that there are three schools and a sporting facility located within 1 to 2 kilometres of the Proposal Site.</p>	<p>The potential impacts of the Proposal on the environment, including air quality, noise, traffic and transport, soils and water, and human health have been assessed in the EIS and as part of this report. These assessments considered the closest receivers, such as the Mercure Hotel, which are located significantly closer to the Proposal Site than the schools and sporting facility identified in the submission. The EIS concluded that the Proposal would not have a significant environmental impact on these receivers, hence impacts to schools and sporting facilities are not predicted.</p> <p>The revised Air Quality Impact Assessment (AAQIA) prepared by Zephyr Environmental, and the Noise and Vibration Impact Assessment (NVIA) prepared by EMM Consulting provide further modelling and assessment of potential impacts on nearby commercial, residential, recreation and educational receivers. No exceedances of assessment criteria for air quality or noise and vibration emissions were predicted in either assessment.</p>	<p>Chapter 17 of the EIS AAQIA - Appendix E NVIA - Appendix F</p>
		17	<p>Concern that the Proposal is located in proximity to a 'learn-to-swim' facility.</p>	<p>As noted above, the Proposal Site is on land zoned IN3 Heavy Industry and is consistent with the land use zoning.</p> <p>The learn-to-swim centre, located 120m to the north-west of the Proposal Site at 26-28 Whyalla Place, Prestons, has been considered in the updated air quality impact and noise</p>	<p>Chapter 4 of the EIS AAQIA - Appendix E NVIA - Appendix F</p>

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Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>impact assessments that have been prepared for this submissions report.</p> <p>The revised air quality assessment (AAQIA) prepared by Zephyr Environmental in October 2022 considered the Starfish Learn to Swim commercial receiver in its updated modelling for the Proposal. The modelling in the AAQIA concluded that the particulate matter and arsenic chromium and lead, and odour concentrations at the learn to swim centre would be below threshold criteria set out in relevant guidelines and policies.</p> <p>The noise and vibration impact assessment (NVIA) prepared by EMM Consulting to supplement the EIS acoustic assessment also considered the impact of noise and vibration during construction and operation on the learn to swim centre. Noise emissions during construction, operation, and as a result of an increase in road traffic were modelled and would not exceed the noise criteria developed for the Proposal (in accordance with industry and EPA guidelines and policies).</p> <p>It is considered that impacts to the learn to swim centre are unlikely.</p>	
	<p>Unsuitability of the site for the Proposal</p>	<p>8, 9</p>	<p>Concern that the Proposal Site is unsuitable for the proposed use.</p>	<p>As stated in Sections 2.24.4 and 3.2 of the EIS, the Proposal Site is zoned as IN3 Heavy Industrial under the Liverpool LEP. In accordance with the Liverpool LEP the objectives of the IN3 zone are to:</p> <ul style="list-style-type: none"> • To provide suitable areas for those industries that need to be separated from other land uses • To encourage employment opportunities 	<p>Chapter 2 of the EIS</p> <p>Chapter 3 of the EIS</p>

Aspect	Issue	Submission #	Issue summary	Response	Reference
				<ul style="list-style-type: none"> To minimise any adverse effect of heavy industry on other land uses To support and protect industrial land for industrial uses To preserve opportunities for a wide range of industries and similar land uses by prohibiting land uses that detract from or undermine such opportunities. <p>Development of the Proposal would meet these objectives as:</p> <ul style="list-style-type: none"> The Proposal is for the purposes of industry The Proposal would benefit from the 500 m separation from the nearest residential receivers offered by the site The Proposal would increase the diversity of businesses in operation in the locality The Proposal would provide employment to approximately 14 staff. 	
		17	Concern that the Proposal Site is not an adequate size to safely accommodate the proposed processes and vehicle movements	<p>Section 13.5.1 of the EIS sets out the measures that are included in the Proposal design and the management controls that will be implemented to manage employee work health and safety. These measures have been included within the Proposal design and can be accommodated within the Proposal Site.</p> <p>The design has been assessed in the Fire and Incident Management Report (Appendix K of the EIS), which concluded that, with the implementation of the design recommendations of the report and the management measures proposed, the Proposal would appropriately address fire and incident risk.</p> <p>Swept path analysis of truck turning within the Proposal Site is provided in Appendix D of the EIS and demonstrates that</p>	<p>Chapter 2 of the EIS</p> <p>Appendix K of the EIS</p> <p>Chapter 13 of the EIS</p> <p>OTMP – Appendix to the OEMP (Appendix C)</p>

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Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>trucks up to and including the largest sized vehicle proposed to access the Proposal Site, can safely manoeuvre within the site.</p> <p>An Operational Traffic Management Plan for the Site has also been developed and is available as an appendix the to OEMP, Appendix C of this submissions report. The OTMP provides management measures for heavy vehicles within the Site and includes a driver code of conduct that all drivers will be required to adhere to.</p>	
Stakeholder consultation	Lack of consultation	15, 16, 17	Stated that no consultation was undertaken with the stakeholders	<p>Chapter 5 of the EIS outlines consultation carried out during the preparation of the EIS including consultation with relevant government and regulatory agencies as well as community and business stakeholders.</p> <p>Section 2 of this report outlines further consultation carried out following the exhibition of the EIS.</p>	Chapter 5 of the EIS Section 2 of this report
Waste management	Clarification of waste streams	16	Request for a full evaluation of chemical risks of the raw contaminated materials and the chemical treatments proposed	<p>Section 2.4 of the EIS provides an overview of the WTF, including identification of the treatment technologies and an overview of the operational processes for each of the waste streams. The updated Project Description available in Appendix B also reviews the process for receiving, treating, storing and offtake of waste in Section 1.4. By limiting the volumes of each waste type on Site at any one time, Hi-Quality is managing the risk of storing potentially hazardous waste materials. This is detailed in Section 1.4.5 of the Project Description.</p> <p>A draft Operational Environmental Management Plan (OEMP) has also been prepared, Appendix C of this submissions report, to provide further clarity around the chemical properties of waste streams and how each waste</p>	Chapter 2 of the EIS OEMP - Appendix C Project Description - Appendix B

Aspect	Issue	Submission #	Issue summary	Response	Reference
Traffic and Transport	Increased number of heavy vehicle movements	1, 3, 18	Concerns raised regarding impacts of the project traffic, in particular heavy vehicles, on Jedda Road.	<p>type would be processed. Further detail can be found in Section 2 of the OEMP.</p> <p>Chapter 8 and Appendix D of the EIS describes the predicted impacts of the Proposal on traffic and transport, including a description of the predicted impacts on Jedda Road and Whyalla Place.</p> <p>In response to the submissions received, an Addendum Traffic and Parking Impact Assessment (ATPIA) has been prepared by Stanbury Traffic Planning, which includes modelling of the intersection of Whyalla Place / Jedda Road, and internal swept path modelling for the Site. The ATPIA is included in Appendix G of this submissions report. The modelling found that post development, and despite additional trucks utilising the roads around the Site, the level of service of the Whyalla Place and Jedda Road intersection would not deteriorate. The ATPIA acknowledges that a small delay would be created for vehicles turning right out of Whyalla Place, but this would largely be mitigated through a gap in traffic created by the signalised intersection at Jedda Road and Joadja Road. Weld Street also provides supplementary access to the industrial land surrounding the Proposal Site.</p> <p>Additionally, an OTMP was prepared for the Proposal by Stanbury Traffic Planning and includes management measures to avoid or minimise traffic impacts as a result of the additional truck volumes expected as part of Site operation. The OTMP is available as available as an appendix the to OEMP, Appendix C of this submissions report.</p>	Chapter 8 of the EIS Appendix D of the EIS ATPIA – Appendix G OTMP – Appendix to the OEMP (Appendix C)

Aspect	Issue	Submission #	Issue summary	Response	Reference
		1	<p>Additional operational traffic information for the Proposal was requested by the submitter, including:</p> <ul style="list-style-type: none"> • Heavy vehicle movements and routes • Types of heavy vehicle that would access the project site • Any proposed changes/upgrades to Jedda Road. 	<p>The requested information is provided in the EIS in the following locations:</p> <ul style="list-style-type: none"> • The Proposal would generate up to 8 truck movements per hour during peak hours and up to 26 movements per hour during the busiest operational hours (being 11am to 2pm). As described in Section 7.2 and shown in Figure 7.5 of Appendix D of the EIS, it is assumed that heavy vehicles would travel to the Proposal Site via the M7 Motorway. All vehicles would enter and exit the Site via Whyalla Place and Jedda Road. Trucks heading north-bound from the Site would use Jedda Road and Bernera Road. Trucks heading south-bound from the Site would use Jedda Road and turn onto the M7 Motorway. • The types of heavy vehicles that would access the Proposal Site are listed in Table 7.1 of Appendix D of the EIS and include semi-trailers (19 m in length), quad-dogs (19.5 m in length) and quin-dogs (22 m in length). Attachment 1 of the TIA (Appendix G) identifies the types of trucks that would be used to transport wastes, including trucks for the transport of soils, 10kL & 35 kL tanker trucks for the transport of liquid waste, sludges and drilling mud and Pantech trucks for the transport of wastes to be stored and transferred from the WTF. • As stated in Chapter 8 of the EIS and further detailed in Section 7.3 (Tables 7.6 and 7.7) of Appendix D, the Proposal is not expected to result in a change in the Level of Service (LoS) at the modelled intersections and the additional traffic generated by the Proposal is not expected to compromise the safety and function of the 	<p>Chapter 8 the of EIS Appendix D of the EIS ATPIA: Appendix G OTMP – Appendix to the OEMP (Appendix C)</p>

Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>surrounding road network. No upgrades or changes to Jedda Road are therefore proposed.</p> <p>As noted above, an ATPIA has prepared, including modelling of the intersection at Whyalla Road and Jedda Road and is included as Appendix G to this submissions report. The further traffic assessment includes an additional traffic survey in Section 2.3. The additional traffic survey was compared with the PeopleTrans survey, with the following results:</p> <ul style="list-style-type: none"> • AM peak: an additional 3 heavy vehicles generated and 5 fewer light vehicles than the existing site tenant. • PM peak: an additional 22 heavy vehicles and 37 light vehicles generated under the Proposal, when compared to the existing site tenant. <p>The ATPIA concludes that negligible delay would be experienced by vehicles turning right out of Whyalla Place, with alternative access available to the Site from Weld Street. No upgrades to Jedda Road are therefore proposed. Heavy vehicle movements will be managed through the implementation of the OTMP, which includes a driver code of conduct for heavy vehicles accessing the Site.</p>	
		2, 5, 8, 9, 10, 11, 12, 13, 14, 18	<p>Suggested that the operational traffic assessment presented in the EIS is not accurate and raised concerns that:</p> <ul style="list-style-type: none"> • The surrounding road network does 	<ul style="list-style-type: none"> • As noted above, and described in Chapter 8 and Appendix D of the EIS, the traffic modelling for the Proposal has demonstrated that the traffic associated with the Proposal would not result in a decrease to the LoS at surrounding intersections and would not compromise the safety and function of the surrounding road network. • Additional traffic modelling undertaken in the ATPIA for the Whyalla Place and Jedda Road intersection similarly 	Chapter 8 of the EIS Appendix D of the EIS ATPIA: Appendix G

Aspect	Issue	Submission #	Issue summary	Response	Reference
			<p>not have capacity to accommodate parking associated with traffic associated with the Proposal</p> <ul style="list-style-type: none"> Operational traffic from the Proposal would impact the condition of roads along vehicle routes used by Proposal traffic, particularly heavy vehicles Traffic accessing the Proposal Site would queue onto the surrounding road network and impact on road network performance 	<p>did not result in a reduction in LoS at the intersection post-development.</p> <ul style="list-style-type: none"> Section 6.1 of Appendix D identifies the roads in the vicinity of the Proposal Site that are classified roads, that are able to accommodate B-double trucks. Whyalla Road, Bernera Road, Jedda Road and Joadja Road are all approved B-Double routes meaning that they are designed and constructed to accommodate heavy vehicles. Maintenance and upkeep of these roads are the responsibility of the respective roads authority. It is also noted that the Proposal Site, until recently, operated as a concrete batching facility where heavy vehicles would have frequently accessed the Site and utilised the road network. As described in Chapter 7 of the EIS, acceptance of waste at the Proposal Site would be through a booking system, which allows for scheduling of waste deliveries to manage the number of vehicles accessing the Site at any one time. As described in Section 8.3.1 of the EIS and Section 6.3 of Appendix D of the EIS, the Proposal Site would be able to accommodate a queue length of four trucks inside the Site and trucks are not expected to queue onto the surrounding road network. 	
		5, 7, 10, 11, 12, 13, 14, 17	Concern that Whyalla Place and the surrounding road network is inadequate to be used for heavy vehicles.	As noted above, Section 6.1 of Appendix D identifies the roads in the vicinity of the Proposal Site that are classified roads, that are able to accommodate B-double trucks. Whyalla Road, Bernera Road, Jedda Road, Ash Road, Lyn Parade and Joadja Road are all approved B-Double routes meaning that they are designed and constructed to	Appendix D of EIS

Aspect	Issue	Submission #	Issue summary	Response	Reference
		5, 6, 7, 17	<p>Concern that the Proposal will increase traffic in Whyalla Place, which is already busy.</p> <p>Concern that the Proposal would have a negative impact on the safety and operation of Whyalla Place and Jodda Road.</p>	<p>accommodate heavy vehicles. The maintenance and upkeep of roads are the responsibility of the roads authority.</p> <p>As stated in Chapter 8 of the EIS and further detailed in Section 7.3 (Tables 7.6 and 7.7) of Appendix D, the Proposal is not expected to result in a change in the LoS at the modelled intersections and the additional traffic generated by the Proposal is not expected to compromise the safety and function of the surrounding road network.</p> <p>As noted above, further traffic impact assessment has been undertaken, including modelling of the intersection at Whyalla Road and Jedda Road has been undertaken and is included as Appendix G to this submissions report. The further traffic assessment concluded that the LoS for this intersection would not deteriorate under Proposal conditions. Additionally, while a slight delay may be experienced for vehicles turning right out of Whyalla Place, there is a suitable gap in traffic created by the signalised intersection at Jedda Road and Joadja Road which would make the delay negligible.</p> <p>Section 2.8 of the ATPIA also included a review of the safety performance of the Whyalla Place / Jedda Road intersection. A review of the crash statistics from 2016 to 2020 indicates that there were no crashes at this location for the available 5-year period reviewed, suggesting that there are no safety issues requiring mitigative measures at the intersection.</p>	<p>Chapter 8 of EIS</p> <p>Appendix D of EIS</p> <p>ATPIA: Appendix G</p>
	Parking spaces	17	Concern about the loss of parking spaces on Whyalla Place.	<p>The ATPIA prepared for this submissions report (Appendix G) addressed car parking impacts of the Proposal in Section 3. The assessment discusses the existing off-street car parking spaces, with the nature of the shift work and changeover, being considered sufficient for the requirements of the</p>	<p>Chapter 8 of EIS</p> <p>Appendix D of EIS</p>

Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>proposed operation of the Site. This is also described in Section 8.3.1 of the EIS. No on-street parking would be required by WTF staff.</p> <p>It is acknowledged that construction of the third driveway at the Site would result in the loss of one car parking space on Whyalla Place. The ATPIA assesses the existing street parking supply in the immediate vicinity of the Proposal Site and concludes that the loss of one car parking space can be accommodated within the immediate vicinity of the Proposal Site. As documented in the PeopleTrans report, following construction of the third driveway, 7 car parking spaces could be provided adjacent to the Proposal Site (Figure 6.4).</p> <p>As described in Section 4.5 of Appendix D of the EIS, the on-street parking on Whyalla Place and other streets nearby mean that overall impacts on parking are considered negligible.</p>	<p>ATPIA: Appendix G</p>
	<p>Heavy vehicle routes</p>	<p>8, 9</p>	<p>Concern heavy vehicles will also use Hoxton Park Road and Ash Road to access the Proposal Site</p>	<p>As described in Section 7.2 and shown in Figure 7.5 of Appendix D of the EIS, it is assumed that heavy vehicles would travel to the Proposal Site via the M7 Motorway. All vehicles would enter and exit the site via Whyalla Place and Jedda Road.</p> <p>The OTMP prepared for the WTF includes a list of B-Double approved roads that provide access to the Site. Table 1 of the OTMP provides a summary of restrictions for the key B-Double approved roads.</p> <p>All vehicles would enter and exit the site via Whyalla Place and Jedda Road. Trucks heading north-bound from the Site would use Jedda Road and Bernera Road. Trucks heading south-bound from the Site would use Jedda Road and turn</p>	<p>Appendix D of the EIS OTMP – Appendix to the OEMP (Appendix C)</p>

Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>onto the M7 Motorway. It is not anticipated that heavy vehicles would use Hoxton Park Road or Ash Road to access the Proposal Site as these would not be the most direct routes to the Proposal Site from the main arterial of the M7 Motorway.</p>	
	Operational hours and peak traffic movements	8, 9	Concern that peak traffic movements would be during peak hours, when traffic flows are heaviest.	<p>As stated in Section 2.23.1 of the EIS and Section 1.4.16 of the updated Project Description (Appendix B of this submissions report), the Proposal would receive waste 24 hours a day. Processing and dispatch of waste would be undertaken between 7am and 6pm, Monday to Saturday and 8am to 6pm on Sundays and Public Holidays. While the Proposal would be operational during these hours, as described in Section 7.1.1 of Appendix D of the EIS, heavy vehicle trip generation would be spread across the day, with the highest number of heavy vehicles predicted at 11am and 1pm (see Figure 7.4 of Appendix D of the EIS).</p> <p>Section 2.4.2 of Appendix D of the EIS presents the traffic volumes for Jemma Road (south of Hoxton Park Road) and Joadja Road across the day, with identified peaks at 7am to 9am and 3pm to 5pm (not corresponding with the peak of movements to/from the Proposal Site). As shown in Figure 7.4 of Appendix D, the estimated heavy vehicle movements during the AM peak is 8 and during the PM peak is 22. For the purposes of the Traffic Impact Assessment, the heavy vehicles movements during the peak hours were modelled to understand the impacts to the road network during the peak hour.</p> <p>As stated in Chapter 8 of the EIS and further detailed in Section 7.3 (Tables 7.6 and 7.7) of Appendix D, the Proposal is not expected to result in a change in the LoS at the</p>	<p>Chapter 2 of the EIS Chapter 8 of the EIS Appendix D of the EIS Project Description – Appendix B ATPIA: Appendix G</p>

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Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>modelled intersections during the AM and PM peak hours and the additional traffic generated by the Proposal is not expected to compromise the safety and function of the surrounding road network.</p> <p>The ATPIA, prepared to supplement the previous traffic assessments, concludes that the WTF development is not expected to compromise the safety or functional performance of the surrounding road network.</p>	
Noise and vibration	Operational noise impacts	3	Concern that the Proposal will increase noise in the vicinity of the Proposal Site, which is already subject to high noise levels associated with concrete and asphalt plants in the area.	<p>The existing noise environment of the Proposal Site is described in Section 9.1 of the EIS and Section 3.0 (Table 1) of Appendix E of the EIS.</p> <p>Project Noise Trigger Levels (PNTLs) were developed for the Proposal, based on the background noise levels, which seek to protect the community against cumulative noise impacts and maintain amenity for receivers. The noise impact assessment, undertaken in accordance with the Noise Policy for Industry (EPA, 2017) concluded that the Proposal would be compliant with the PNTLs for all time periods, including under noise-enhancing meteorological conditions.</p> <p>A revised NVIA has been prepared for the Proposal to better clarify potential noise impacts. The revised assessment is provided in Appendix F and found that noise levels from construction and operation of the Proposal Site are predicted to comply with relevant noise targets at all assessment locations. Vibration levels during construction and operation are also predicted to fall within assessment criteria levels at all assessment locations.</p>	Chapter 9 of the EIS Appendix E of the EIS NVIA: Appendix F
	Results for noise	15	Questions the difference of 1 decibel between the	A revised NVIA has been prepared for the Proposal to better clarify potential noise impacts. The revised assessment is	NVIA Appendix F

Aspect	Issue	Submission #	Issue summary	Response	Reference
	enhancing meteorological conditions		usual meteorological conditions and the noise enhancing meteorological conditions.	provided in Appendix F. Operational noise was assessed in accordance with the NSW EPA, <i>Noise Policy for Industry</i> (2017) (NPfI), which includes consideration of noise enhancing meteorological conditions. The predicted operational noise levels for the day, evening, and night periods under noise enhancing meteorological conditions are presented in Table 6.2 of the NVIA. The results for operational noise under noise enhancing meteorological conditions are presented as they represent the ‘worst-case’ scenario for operations. The modelling found that Site operations, even during noise enhancing meteorological conditions would be below the noise management levels for day, evening and night.	
	Operational noise sources	15	Concern that there is not a complete equipment list with sound power levels provided. In particular, concern that a mobile shredder, identified in Section 10.6.2 has not been considered.	<p>Section 9 of the EIS addresses noise and vibration impacts of the Proposal, and in Section 9.2.1 suggests that most equipment would generate negligible noise emissions due to being located and operated within the building. The main sources of noise emissions were identified as external sources, being the ventilation exhaust stacks (3 strobic fans) and heavy vehicle movements at the Site.</p> <p>Similarly, the NVIA (Appendix F) prepared for the submissions report determined that the plant and equipment with the highest risk for noise intrusion or disturbance to nearby receivers were those that penetrated the roof (i.e. the strobic fans that are part of the HVAC system). The equipment list is included in Table 5.2 of the NVIA and includes the mobile shredder. The NIA prepared for the EIS (as Appendix E) identified two primary noise controls to attenuate noise emissions from the strobic fans, which were included in noise modelling for the NVIA.</p>	<p>Chapter 9 of the EIS Project Description – Appendix B Appendix E of the EIS NVIA: Appendix F</p>

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Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>The Project Description available in Appendix B provides an equipment list in Section 1.4.6 for operations and 1.3.3 for construction.</p>	
	Assessment of receivers	15	Concern that the noise impact assessment did not consider noise impacts at receivers closer than 350 m from the Proposal Site.	<p>A revised NVIA has been prepared for the Proposal to better clarify potential noise impacts. The revised assessment is provided in Appendix F. The noise sensitive receivers identified within the vicinity of the Proposal Site include Mercure Hotel, a residential receiver, the Learn to Swim centre at 26-28 Whyalla Place (55 m), and the Potter's House Christian Church at 1/45-47 Whyalla Place (300 m).</p> <p>The updated noise modelling did not predict any noise criteria exceedance or intrusive vibration levels for any of the receivers during night or daytime operation, or during construction.</p> <p>The Proposal Site is surrounded by industrially zoned land. The amenity noise level (ANL) prescribed under the Noise Policy for Industry (EPA, 2017) applicable to industrial sites is 70 LAeq, dB(A). As the Proposal meets the more stringent residential and hotel criteria for the aforementioned sensitive receivers, the industrial noise criterion would be achieved at the adjacent industrial sites.</p>	<p>Appendix E of the EIS NVIA Appendix F</p>
Air quality and odour	Operational air quality	3, 4, 10, 11, 12, 13, 14, 16	Concern that the Proposal will increase air pollution in the vicinity of the Proposal Site, which is already subject to air pollution from concrete and	<p>A revised AQIA has been prepared for the Proposal to better clarify potential air quality impacts. The revised assessment is provided in Appendix E and concluded that the Proposal would not exceed assessment criteria at any of the receivers modelled (Section 7 of the AQIA).</p> <p>Impact criteria for the AQIA were determined using the <i>Approved Methods for the Modelling and Assessment of Air Pollutants in NSW</i> by the NSW EPA. The air quality</p>	<p>Chapter 10 of EIS Appendix F of EIS AAQIA Appendix E</p>

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Aspect	Issue	Submission #	Issue summary	Response	Reference
			<p>asphalt plants in the area.</p>	<p>assessment looks at cumulative particulate emission impacts and thus accounts for existing pre-development background particulate matter concentrations.</p> <p>The existing air quality in the vicinity of the Proposal Site is described in Section 10.1.1 of the EIS and Section 4 of Appendix F of the EIS and Section 5 of the AAQIA.</p> <p>The dispersion modelling presented in the AAQIA accounts for the local meteorology, existing air quality, and land-use information and used calculated emission estimates to predict ground level concentrations to compare with relevant EPA assessment criteria. The results of the dispersion modelling indicate that the predicted concentrations for PM₁₀, PM_{2.5}, arsenic, chromium, lead and odour at the closest sensitive receptors are all predicted to comply with their relevant air quality criteria.</p> <p>Post- commissioning stack testing will be performed for particulate matter and metals to confirm the low to negligible impacts predicted are achieved by the Proposal.</p>	
	<p>Odour</p>	<p>2, 15, 16</p>	<p>Concern raised regarding the potential for the project to generate odour, and the impact this may have on adjacent businesses.</p>	<p>As stated in Section 10.4.3 of the EIS, the Air Quality Impact Assessment (Appendix F of the EIS) assessed the potential impacts from volatile organic compounds (VOCs) were modelled and found to be three orders of magnitude lower than the applicable criteria, indicating very low to negligible risks of loss of amenity due to odour emissions.</p> <p>An addendum AQIA has been prepared for the Proposal to better clarify potential air quality impacts. The revised assessment is provided in Appendix E with additional odour impact assessment provided in Section 7.3. The assessment found that the odour concentration (in Odour Units, or OU)</p>	<p>Chapter 10 of EIS Appendix F of EIS AAQIA Appendix E</p>

Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>modelled at all receivers fell within the prescribed criteria, being 2 OU. Nearly all receivers were predicted to experience <1 OU, with the exception of the Learn to Swim centre, at <2 OU and still within the criteria limits.</p> <p>Section 2.17 of the EIS and Section 1.2.1.7 of the updated Proposal Description describe the air quality management system that would be installed to manage potential air quality impacts from the Proposal. This includes installation and operation of a heating, ventilation and air conditioning (HVAC) system, which will maintain negative pressure within the building envelope, which will minimise fugitive air emissions. Particulate matter and activated carbon filters will be installed and maintained at the point of emission of air from the Proposal, to minimise the release of particulate matter and volatile organic compounds.</p> <p>An addendum AQIA has been prepared for the Proposal to better clarify potential air quality impacts. The revised assessment is provided in Appendix E and found that particulate matter generation for both PM₁₀ and PM_{2.5} concentrations were not predicted to exceed air quality criterion for sensitive receivers. Similarly, concentrations of arsenic, chromium and lead have been modelled and the results indicate concentrations would not exceed assessment criteria at any receiver location.</p> <p>Monitoring would be undertaken during operations to confirm the low to negligible impacts predicted are achieved by the Proposal.</p> <p>An Operational Air Quality Management Plan will be developed for the Proposal that will outline measures to be implemented in the event of failure of the HVAC or filters for</p>	<p>Chapter 2 of the EIS</p> <p>Chapter 10 of the EIS</p> <p>Appendix F of the EIS</p> <p>Project Description – Appendix B</p> <p>AAQIA Appendix E</p>
	<p>Particulate matter and other emissions impacting adjacent businesses</p>	<p>6, 8, 9, 15</p>	<p>Concern that particulate matter and other emissions from the Proposal would impact adjacent businesses. Concern that failure of the proposed filtration systems would result in release of contaminants to the air.</p>		

Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>the emission points for the facility; noting that receipt and treatment of materials would cease until systems are reinstated and operation</p>	
	Background data	15	Request for commentary on representativeness of data from the meteorological station used for baseline data and what may be learnt from drawing on a larger network of stations.	<p>A revised AAQIA has been prepared for the Proposal to better clarify potential air quality impacts. The revised assessment is provided in Appendix E and provides a summary of local meteorology in Section 5.1.</p> <p>To inform the AAQIA data from a total of eight meteorological stations were used to represent the local meteorology in the vicinity of the Proposal Site. These are listed in Table 4-1 of the AAQIA and include four from the Bureau of Meteorology (BoM) and three from the Department of Planning and Environment (DPE). Data from these sites were used in the model CALMET to provide a three-dimensional wind field model across a 40km x 40km domain for the assessment.</p> <p>The year 2021, was then chosen as representative of meteorological conditions in the area. To determine whether or not this was a representative year (as required in the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW), an analysis of wind speed and wind direction was carried out, and is presented in Section 5.1 of the AAQIA. As the Liverpool automatic weather station was the closest monitoring location to the Proposal Site, this was the site chosen for comparison. The analysis showed that 2021 was representative, being not significantly different to any of the other five years analysed (2016 – 2021).</p> <p>Once the representative year was determined the full meteorological modelling was conducted for 2021, including data from seven other weather station locations (Horsley Park, Badgerys Creek, Camden, Holsworthy, Bankstown,</p>	AAQIA Appendix E

Aspect	Issue	Submission #	Issue summary	Response	Reference
	Isopleths	15	<p>Concern that the isopleths in Appendix E of the Air Quality Impact Assessment don't reflect the predominant wind direction shown in the wind rose in the Air Quality Impact Assessment.</p> <p>In particular, concern that metallic aerosols which are sub-PM2.5 are likely to be carried further if there are differences between the assumed and actual meteorological conditions at the Proposal Site.</p>	<p>Bringelly and St Marys) to represent the meteorology across the model domain – in three dimensions.</p> <p>Air quality impacts were assessed in Chapter 10 of the EIS, with the Air Quality assessment prepared by Golder available in Appendix F of the EIS. The assessment in the EIS utilised baseline air quality data from the EPA's Ambient Air Quality Monitoring Station in Liverpool. The air quality assessment did not include windroses to depict typical wind speed and direction at the Site.</p> <p>An addendum AQIA has been prepared for the Proposal to better clarify potential air quality impacts. The revised assessment is provided in Appendix E and provides updated annual and seasonal windroses for the Liverpool AWS in Section 5.1.</p> <p>The windroses indicate that wind speed and direction are reasonably consistent, which are predominantly light and from the southwestern quadrant, with stronger winds from the western and eastern quadrant. Seasonal variation windroses indicate that stronger winds occur in spring from the west, and some from the southwest during winter.</p> <p>Metallic aerosols such as arsenic, chromium and lead have been assessed as part of the AAQIA in Section 7.2. The assessment predicts that metal concentrations (1-hour 99th percentile) would fall well below prescribed criteria at all receivers.</p> <p>Ongoing air quality monitoring will be performed at the Site during operation to validate the modelling predictions, with further mitigation measures available to ensure safe</p>	<p>Chapter 10 of the EIS Appendix F of the EIS AAQIA Appendix E Section 8</p>

Aspect	Issue	Submission #	Issue summary	Response	Reference
	Efficacy of mitigation measures	15	Concern that the efficacy of the mitigation measures, in particular the use of the HVAC to maintain negative pressure within the treatment building and high-speed roller doors, to prevent fugitive emissions, would be compromised during the peak delivery times (i.e. when 26 vehicle movements per hour are expected).	<p>operation of the Site for both employees and nearby receivers. These measures are included in Section 8.</p> <p>Air quality impacts were assessed in Chapter 10 of the EIS, with the Air Quality assessment prepared by Golder available in Appendix F of the EIS.</p> <p>An addendum AQIA has been prepared for the Proposal to better clarify potential air quality impacts. The revised assessment is provided in Appendix E and discusses the management of emissions to air in Section 6. When the high-speed roller doors are open the fans within the facility would continue to draw air in towards them. Subsequently, the doors do not always need to be closed to achieve negative pressure. Should there be a brief period of release when the roller doors are open this is considered unlikely to be significant as air would continue to flow into the building.</p> <p>Measures to mitigate potential impacts to air quality are prescribed in Section 16 of the EIS and are provided with additional clarifications in Section 8. Management measures include the development of an OAQMP that will outline:</p> <ul style="list-style-type: none"> • Procedures to routinely maintain and test operation of the HVAC and emissions control systems • Procedures for air quality monitoring • Measures to minimise the fugitive emissions from the Site <p>Contingency measures to minimise air quality impacts in the event of failure of the HVAC and emissions control systems.</p>	Chapter 10 of the EIS Appendix F of the EIS AAQIA Appendix E Section 8

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Aspect	Issue	Submission #	Issue summary	Response	Reference
	Construction emissions	15	Concern about dust emissions from stockpiles during construction.	<p>An addendum AQIA has been prepared for the Proposal to better clarify potential air quality impacts. The revised assessment is provided in Appendix E.</p> <p>Dust generated through receipt, turning, mixing and loading of dry soil materials would be managed through the HVAC system (described in Section 1.2.1.7 of the updated Proposal Description (Appendix B of this submissions report). The HVAC system is further described in Section 2 of the AAQIA, where it is identified that strobic fans will operate at higher flow rates when dusty or volatile materials are being delivered, handled, or treated. The emissions to air from the WTF are drawn through the emissions control system (described in Section 6 of the AAQIA and Section 1.2.1.7 of the updated Proposal Description). Table 6-1 of Section 6 of the AAQIA summarises the stack and emission parameters for particulate matter and metals, which shows particulate matter emissions for both PM₁₀ and PM_{2.5} fall within prescribed criteria as defined by the <i>Approved Methods</i> statutory guidelines (NSW EPA).</p>	AAQIA Appendix E Project Description Appendix B
Soils and water	Impact to downstream receivers and protection of waterways	4, 6	Concern about the potential for the Proposal to result in adverse impacts to downstream water quality, including sensitive lands such as wetlands and the Georges River catchment.	<p>As described in Section 11.2.1 of the EIS, the Proposal Site currently drains via Council's drainage network and there will be minimal change to the extent of impervious surfaces on site, and hence minimal increase in stormwater runoff, as a result of the Proposal. Once developed, the Proposal Site would continue to discharge clean stormwater to Council's stormwater network. The following approach is proposed for managing clean stormwater on site:</p> <ul style="list-style-type: none"> Stormwater from the warehouse roof would be directed to an onsite rainwater storage tank and used for Site 	Chapter 11 of the EIS Appendix H of the EIS Section 8 Project Description – Appendix B

Aspect	Issue	Submission #	Issue summary	Response	Reference
			<p>Question how the Proposal will protect downstream waterways.</p>	<p>activities; excess water will be directed directly to Council's drainage network</p> <ul style="list-style-type: none"> • Stormwater runoff from the carpark and gardens would be directed to Council's stormwater network. • Surface water monitoring would be undertaken at the point of discharge of surface water from the Site. <p>Site generated wastewater would be separated from stormwater through the design and operational procedures listed in Section 11.7.2 of the EIS and Section 1.2.1.8 of the updated Project Description, which includes:</p> <ul style="list-style-type: none"> • All waste materials storage and handling, leachate collection and vehicle washdown would occur within the treatment facility such that no process water would be allowed to mix with stormwater • The minimum finished floor level for the Proposal would be above the 1% Annual Exceedance Probability (AEP) flood level • Wastewater with dissolved phase contaminants would be contained in lined areas to ensure interaction with groundwater does not occur • Development and implementation of a pollution incident response management plan (PIRMP) and an inspection regime for bunding and chemical storage areas will be included within the OEMP (a draft OEMP has been provided in Appendix C) • Development and implementation of an Operational Site Water Management Plan as part of the OEMP. <p>An additional technical memo has been prepared to provide additional assessment of flood risk and stormwater impacts</p>	<p>Flood Memo Appendix D</p>

Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>that may arise from the Proposal (Appendix D). The memo confirms the use of Council’s stormwater infrastructure network, and that the Site’s independent stormwater and leachate collection systems would collect water runoff from within the building envelope to be treated to Sydney Water’s standard before discharge to sewer via a trade wastewater connection. Validation testing would confirm compliance with the discharge criteria prior to discharge.</p> <p>The implementation of these design and management measures would prevent the discharge of contaminated water from the Proposal Site impacting downstream waterways.</p>	
	Flood risk	6	Concern about the risk of flooding to the site and the potential for release of contamination during the 1 in 100 year flood event.	<p>A detailed flood study for the Proposal is included in Appendix H and summarised in Chapter 11 of the EIS. The flood study concluded that the Proposal Site would not be inundated during the 1 in 100 year flood event. Additional analysis has been undertaken of the potential flood risk during the PMF, and is included as Appendix D.</p> <p>In accordance with the mitigation measures identified in Section 8 any extension to the existing buildings or modifications of the exterior walls will be constructed with flood-compatible building components below the PMF level (confirmed by an engineers report that demonstrates it can withstand the forces of floodwater, debris and buoyancy).</p> <p>Chapter 13 and Appendix J of the EIS identify the potential for release of contaminants to flood water as a potential exposure pathway posing a human health risk from the Proposal. Section 5.1.3 of the human health risk assessment (Appendix J of the EIS) concluded that, through the implementation of the design and operational management measures included in the EIS, the exposure to the community</p>	<p>Appendix H of the EIS Chapter 11 of the EIS Chapter 13 of the EIS Appendix J of the EIS Section 8 Flood Memo Appendix D</p>

Aspect	Issue	Submission #	Issue summary	Response	Reference
				of contaminated flood water is unlikely and the subsequent risks to human health are low.	
Human health	General health concerns	8, 9, 16, 2, 17	Concern that the operation of the Proposal would not protect the health and safety of neighbouring businesses and the workforce and the residential community to the north of Hoxton Park Road.	<p>A Health Impact Assessment is included as Appendix J of the EIS, which assesses the potential for community, including adjacent business and workforces, exposure to contaminants from the off-site migration of contaminants from the Proposal Site. The Health Impact Assessment concluded that, based on the design and infrastructure control measures and the implementation of construction and operational environmental management plans, the potential for community exposure to contaminants from the Proposal Site is unlikely and the community health risks are low.</p> <p>This is supplemented by additional acoustic and air quality assessments prepared for the Proposal, which confirm construction and operation activities at the Site would not exceed criteria for noise or vibration emissions, particulate matter, odour or aerosolised metals. The NVIA is available in Appendix F and the AAQIA is available in Appendix E.</p>	Appendix J of the EIS NVIA: Appendix F AAQIA: Appendix E
	Exposure to contaminated material	2, 10, 11, 12, 13, 14	Concern about potential risk to surrounding workers and the community in the event of a release of contaminant(s) from Site or in the event of a spill.	<p>Section 13.5 of the EIS describes design and management measures that would be implemented to minimise risk of exposure of workers and the surrounding community to potentially harmful contaminants. Design controls include:</p> <ul style="list-style-type: none"> • Use of particulate matter filters and activated carbon filters at air exhaust stacks • Operation of a HVAC system to mitigate and collect fugitive emissions • Capture and treatment of wastewater and leachate in a designated collection system, which would also act as secondary containment for firewater 	Chapter 13 of the EIS

Aspect	Issue	Submission #	Issue summary	Response	Reference
		4	Concern about occupational health and safety issues arising from waste dislodging from truck during deliveries.	<ul style="list-style-type: none"> Internal bunding to capture and contain any spills. <p>The workplace health and safety system, set out in Section 13.5.3 of the EIS, would be implemented for the Proposal and would be refined and implemented for the Proposal. The implementation of these measures would minimise the risk of exposure of workers and the community to contaminated materials.</p> <p>Additionally, as part of the process for obtaining an Environment Protection Licence to permit scheduled activities at the Site, a Pollution Incident Response Management Plan would be prepared for the WTF, which is reviewed on a yearly basis.</p> <p>It is a regulatory requirement within NSW that a load on any vehicle must be loaded in a way that does not make the vehicle unstable or unsafe and loads must be secured so that it is unlikely to fall or dislodge from the vehicle and be restrained by an appropriate method (Heavy Vehicle National Law (NSW) No 42a of 2013). Clause 70 of the of the Protection of the Environment (Waste) Regulation 2014 requires that waste is transported in a manner that avoids the waste spilling, leaking or otherwise escaping from any vehicle or trailer used to transport the waste. All heavy vehicles accessing the Proposal Site would need to operate in accordance with regulatory requirements.</p> <p>Design and management measures have been identified within the EIS to address the potential for community exposure to contaminated wastes. As described in Chapter 7 and Appendix J of the EIS, these measures include:</p>	Chapter 7 of the EIS Appendix J of the EIS OTMP – Appendix to the OEMP (Appendix C)

Aspect	Issue	Submission #	Issue summary	Response	Reference
				<ul style="list-style-type: none"> All waste transported to Site would be in accordance with the <i>Protection of the Environment Operations Act 1997</i> and the <i>Protection of the Environment (Waste) Regulation 2014</i> Trucks would pass over a wheel wash inside the building prior to exit to prevent tracking of waste on outside hard stand and beyond the site boundary The potential migration of contaminants beyond the Site boundary will be managed under the OEMP. <p>Consequently, community exposure to contaminated materials from trucks accessing and leaving the Site are unlikely and risks to human health are low.</p> <p>An Operational Traffic Management Plan (OTMP) has been prepared for the Site which is provided in available as an appendix the to OEMP, Appendix C of this submissions report. The OTMP includes operational procedures for heavy vehicles at the Site in Section 2.4, which requires that all trucks travelling to the Site must be covered, and the covering may only be removed within the Site once the roller doors are fully closed. Additionally, trucks exiting the Site are required to pass through a wheel wash, which would minimise the risk of vehicles tracking soil or other debris onto public roads.</p>	
	Health impacts from increased noise	5, 7	Concern that the Proposal would result in noise impacts leading to detrimental health outcomes for	A Noise and Vibration Impact Assessment is included in Appendix E and summarised in Chapter 9 of the EIS. The noise impact assessment concluded that the Proposal would be compliant with the PNTLs for all time periods, including under noise-enhancing meteorological conditions.	Chapter 9 of the EIS Appendix E of the EIS Chapter 13 of the EIS

Aspect	Issue	Submission #	Issue summary	Response	Reference
			commercial and residential receivers.	<p>Section 5.1.2 of the Health Impact Assessment (Appendix J of the EIS), and summarised in Chapter 13 of the EIS, concluded that the likelihood of exposure to increased ambient noise levels in the surrounding community as a result of the Proposal is unlikely and the consequent risks to human health are therefore considered to be low.</p> <p>The findings presented in the EIS have been further tested and refined in the additional NVIA prepared for the Proposal, which confirms construction and operation activities at the Site would not exceed criteria for noise or vibration. The NVIA is available in Appendix F.</p>	Appendix J of the EIS NVIA – Appendix F
	Health impacts due to decreased air quality	5, 6, 7	Concern that the Proposal would result in air quality impacts leading to detrimental health outcomes for commercial and residential receivers.	<p>The Air Quality Impact Assessment is included in Appendix F and summarised in Chapter 10 of the EIS. As described above, the Air Quality Impact Assessment concluded that the Proposal would be broadly compliant with the assessment criteria. Post—commissioning monitoring would be undertaken to confirm the performance of the air emission control system is meeting the relevant criteria.</p> <p>Section 5.1.1. of the Health Impact Assessment in Appendix J of the EIS, and summarised in Chapter 13 of the EIS, concluded that, with the implementation of the proposed emissions control systems and management and maintenance procedures identified in the EIS, community exposure to contaminants in air is unlikely and risks to health are similarly unlikely. These conclusions will be confirmed through the monitoring program that would be undertaken for emissions from the Site.</p> <p>The findings presented in the EIS have been further tested and refined in the AAQIA prepared for the Proposal, which confirms construction and operation activities at the Site</p>	Chapter 10 of the EIS Appendix F of the EIS Chapter 13 of the EIS Appendix J of the EIS AAQIA – Appendix E

Aspect	Issue	Submission #	Issue summary	Response	Reference
Fire and incident management	Fire from Proposal impacting surrounding area	10, 11, 12, 13, 14	Concern that a fire at the Proposal Site would impact the surrounding area	<p>would not exceed criteria for particulate matter, odour or aerosolised metals. The AAQIA is available in Appendix E.</p> <p>A Fire and Incident Management Report is included as Appendix K and summarised in Chapter 14 of the EIS. As stated in Section 7.2.1 of Appendix K, no hazards to adjoining buildings were identified as the external walls will achieve the requisite fire resistance level (FRL) (see Section 10.2.1 of Appendix K).</p> <p>Fire risk would also be managed through the implementation of design and management controls, including:</p> <ul style="list-style-type: none"> • Limiting of stockpile sizes and spacing of stockpiles by 6 m to meet the requirements of Fire and Rescue NSW's <i>Fire Safety in Waste Facilities Guidelines</i> • Design and installation of a new hydrant booster system, a new sprinkler booster system, fire detection and alarm, and smoke hazard management systems in accordance with Fire and Rescue NSW's <i>Fire Safety in Waste Facilities Guidelines</i> • The extended warehouse will be designed to be compliant with the Performance Requirements of the National Construction Code <p>Upgrades to the fire management system would occur as part of the first stage of construction of the Proposal.</p> <p>Additionally, the Proposal would be designed such that any water used for the purposes of firefighting would be contained on site (see Section 7.9 of Appendix K), minimising potential impacts of fire at the Proposal Site to the environment.</p> <p>The OEMP for the Site (Appendix C) provides fire protection information in Section 2.7 and emergency response details in</p>	Chapter 14 of the EIS Appendix K of the EIS OEMP: Appendix C

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				Section 4.9. Additionally, an Emergency Management Plan will be prepared for the WTF in line with requirements set by Fire Rescue NSW (Section 4.2 of this submissions report).	
Socio Economic	Decrease in surrounding property value and impacts to business	2, 5, 7, 8, 9, 18	Concern about potential adverse economic impacts of the Proposal on nearby property and business, including decrease in appeal to future tenants of neighbouring properties and clients of businesses	As stated in Section 15.5 of the EIS, the Proposal Site is located on land zoned for heavy industry, on which the Proposal is permissible. It is therefore considered that the Proposal is suitably located and corresponding local economies, including potential market and property values will not diminish due to the location of the Proposal. There is the potential that property values associated with land use demand may increase due to the agglomeration of further services within the locality.	Chapter 15 of the EIS
	Amenity of the suburb	16, 18	Concern that the Proposal is inconsistent with the existing family-oriented small business dynamic of the area and will decrease the amenity of the suburb.	The Proposal is located in an area zoned IN3 for heavy industry. The Proposal is consistent with the land use zoning. The EIS concluded that impacts to the amenity of Prestons would not result from the Proposal as the Proposal would meet the prescribed criteria for air quality, noise, contamination, fire and incident management and traffic and transport.	Chapter 4 of the EIS
Environmental management	Concern about environmental track record of Proponent	15	Concern about the Hi Quality's environmental performance as the company has received fines for failing to comply with EPA requirements in the past.	It is acknowledged that Hi-Quality Waste Management has recorded non-compliance against their EPLs in the past.. Hi-Quality has introduced a robust environmental management system which has been successfully implemented across its sites to meet and exceed operational environmental management requirements. As stated in Section 16.2 of the EIS, the Proposal would be operated in accordance with Hi-Quality's overarching environmental management system. Operational	Chapter 16 of the EIS OEMP: Appendix C

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Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>environmental management plans will be developed to meet all Proposal requirements, including the environmental management measures set out in this submissions report. A draft OEMP has been prepared as part of this report (Appendix C) demonstrating how environmental management will be carried out onsite. The facility would be subject to audit requirements that would be reviewed by both the EPA and DPE, to ensure on-going compliance with operational requirements.</p>	
	<p>Uncertainty in application of environmental management measures</p>	<p>15</p>	<p>Request that environmental management measures be strengthened to clearly identify the applicable standards that would be complied with, the triggers for action, the actions that would be undertaken in response to an identified trigger and the persons responsible for the implementation of those actions.</p>	<p>Section 8 of this report provides an updated list of environmental mitigation measures, including a number of revises/additional measures that have been identified in response to submissions raised on the Proposal.</p>	<p>Section 8</p>
<p>Ecologically sustainable development</p>	<p>No community benefit</p>	<p>8</p>	<p>Concern that the Proposal is not justified as it does not benefit the community</p>	<p>The Proposal would provide significant benefit in terms of addressing and securing capacity and capability to treat certain wastes within the Sydney Metropolitan and Western Sydney area and would enable the efficient, safe and</p>	<p>Chapter 17 of the EIS</p>

Aspect	Issue	Submission #	Issue summary	Response	Reference
				<p>productive use of waste resources, which is in the public interest.</p> <p>The justification for the Proposal is presented in Chapter 17 of the EIS. In summary, the Proposal would provide the following benefits, and is therefore justified:</p> <ul style="list-style-type: none"> • Current and future urban development requires the development of waste processing and treatment facilities to treat contaminated soils • The Proposal would provide a strategic asset and waste treatment service that would play a key role in the delivery of construction and development within Western Sydney • The potential impacts of the Proposal can be mitigated and managed through the implementation of the mitigation measures identified in the EIS and this submission report and no significant impacts are predicted during construction and operation of the Proposal. <p>The EIS concluded that the Proposal is in the public interest and therefore recommended approval.</p>	
<p>Outside of Project scope</p>	<p>Future expansion</p>	<p>10, 11, 12, 13, 14</p>	<p>Concern that the site area is too small and will not accommodate future expansion</p>	<p>As described in Chapter 2 of the EIS, the Proposal Site is approximately 9,000 m² and has an existing warehouse of 4,097m² and office facilities. The Proposal would expand the existing warehouse area by 1,300m² and utilise the existing office space for Stage 2 of the Proposal. The proposed expansion of the warehouse and use of the office space is consistent with the requirements of the Liverpool DCP.</p> <p>There are no plans to expand operations or the size of the facility beyond what is described in the EIS.</p>	<p>Chapter 2 of the EIS Proposal Description Appendix B</p>

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				<p>Hi-Quality operate a similar facility in Yatala, Queensland, which receives 270,000 tpa of contaminated soils, sludges and liquid waste for processing. A comparison of the Proposal Site against the Yatala facility is provided in the updated Proposal Description (Appendix B), with a justification of the site suitability given the similarities to the Yatala facility.</p>	

6 AMENDED PROPOSAL

Chapter 2 of the EIS, the proposal description and associated assessment presented in the EIS is based on an indicative and conceptual design. Refinement to the Proposal and the Proposal description has based on:

- Submissions provided by government agencies and the community;
- As part of design progression; and,
- To provide additional clarity where relevant.

Consequently, the Proposal has been amended to no longer accept asbestos on site.

The Proposal would also construct the entire building extension during Stage 1 over a nine month construction period with the internal fitout of the Stage 2 areas still to occur prior to the operation of Stage 2 of the Proposal. Construction of the Proposal as a single stage would have the following benefits:

- Overall reduction in construction timeframes, reducing the duration of impacts to surrounding businesses
- Minimise the risks associated with Stage 1 operations coinciding with Stage 2 construction, such as:
 - Installation of the leachate management system within the building for the Stage 1 and Stage 2 operations during Stage 1, which would reduce the risk of cross contamination of stormwater and leachate during Stage 2 construction
 - Establishment of the stormwater management system during Stage 1, reducing the risk of cross contamination with leachate during Stage 2 construction / fit out
 - Relocation of the fire water tank and associated infrastructure to adjacent the front gate during Stage 1, improving access for fire fighting crews
 - Design and installation of electrical systems during Stage 1 that are of sufficient capacity to accommodate Stage 1 and 2 operations, allowing for testing of the systems during Stage 1 and providing redundancy
 - Allow for installation and testing of the HVAC system / air filtration system during Stage 1 that is sufficient to cater for the Stage 1 and Stage 2 operations, which would allow for testing and refinement of the system prior to full-scale operations.

A consolidated description of the Amended Proposal, including the Proposal (as presented in the EIS) and taking into consideration the amendment to the Proposal (i.e. the Proposal would not accept asbestos on site) is provided in Appendix B. The intent of the Proposal Description in Appendix B is to provide increased clarity on the description of the Proposal and the proposed operations.

Where no amendment has been made to the Proposal there has been no further discussion within this submissions report. No additional impacts to those assessed and presented in the EIS are expected due to the above changes.

7 SUMMARY OF REVISED TECHNICAL ASSESSMENTS

In response to government agency and public submissions several technical assessments were revised and updated, as summarised in Table 7-1.

Table 7-1 Summary of additional impact assessments

Report	Content	Appendix
Flood Assessment Memo	This memo provides prepared to provide further information on the flood conditions of the Site and the proposed stormwater management strategy.	Appendix D
Revised Air Quality Impact Assessment	The AQIA includes an assessment of the following: <ul style="list-style-type: none"> assessment of predicted exceedances for arsenic (As) and chromium (Cr) Clarification of ventilation parameters for the emission control system demonstration of compliance for the point source discharges from the Proposal against the <i>Protection of the Environment (Clean Air) Regulation</i> quantitative assessment of potential odour impacts. 	Appendix E
Noise and Vibration Impact Assessment	A new noise and vibration impact assessment was prepared to provide further information and detail on noise and vibration, and to provide clarity to government authorities, the consent authority, and local businesses and residents that may be affected by the Proposal.	Appendix F
Addendum Traffic Impact Assessment	A new traffic and transport impact assessment was prepared to provide further information and detail on the traffic and car parking impacts. This includes assessment of: <ul style="list-style-type: none"> additional traffic generation of the proposed development and concern over the existing operation of the junction of Jedda Road/Whyalla Place car parking impact and loss of on-street carparking spaces and insufficient provides an Operational Traffic Management Plan that includes measures to manage traffic and parking impacts. 	Appendix G

Further detail on each assessment and its findings are provided below.

7.1 Flood Assessment

In response to Council’s submissions further assessment of the potential flooding impacts was carried out to provide further information on the flood conditions of the Site and the proposed stormwater management strategy.

The site is located beyond the 9-hour 1%, 0.5% and 0.2% AEP flood extents however it is inundated during the extremely rare PMF flood event. During the 2 hour PMF event, the flood conditions within the Site are generally considered to be unsafe for vehicles, children and the elderly, and low hazard to adults and structures. The proposed redevelopment does not significantly impact flood behaviour within or immediately surrounding the Site. The proposed redevelopment will aim to:

- Maintain the existing building floor levels, and ensure any building extensions remain above the 1% AEP flood level of 23.1m AHD.

- Any extension to the existing buildings or modifications of the Site fences/exterior walls will be constructed with flood-compatible building components below the PMF level, with an engineer's report to be provided demonstrating they can withstand the forces of floodwater, debris and buoyancy up to and including the PMF level.
- Any on-site parking will be located above the 1% AEP flood level of 23.1m AHD.

With regards to general stormwater management, within the building areas, a dedicated leachate collection system will collect and treat any runoff. Given that the proposed redevelopment is not significantly increasing the imperviousness of the Site, additional water quality treatment for areas outside the building footprint is not proposed.

7.2 Revised Air Quality Impact Assessment

The purpose of the Air Quality Impact assessment was to provide further information to address comments received from the EPA and Council in response to the EIS, requiring clarification of emission estimation and modelling results, particularly with regard to metals such as arsenic and chromium. Odour modelling has also been undertaken to address concerns regarding the lack of a quantitative analysis of odour in the previous assessment.

The dispersion modelling accounts for the local meteorology and land use information and used calculated emission estimates to predict ground level concentrations to compare with relevant EPA assessment criteria. Conservative assumptions were made regarding both emissions estimates and air flow parameters from the ventilation outlets.

The results show that the predictions for PM₁₀ and PM_{2.5} are very low and unlikely to be discernible above background for each of the 12 specific sensitive receptors. The contribution from the facility is not predicted to cause any exceedances of the annual criteria or any additional exceedances of the 24-hour criteria when added to the highest (non-exceeding) background concentrations. This is similarly the case for heavy metal predictions (arsenic, chromium and lead) with predictions very and well below their respective criteria for each of the 12 specific sensitive receptors assessed. Finally, results show that the odours levels would be below the 2 OU criterion and for the majority of sensitive receptors would be below 1 OU, the theoretical level of detection.

7.3 Revised Noise and Vibration Impact Assessment

The purpose of the Noise and Vibration Impact Assessment (Appendix F) is to provide further information and detail on potential noise and vibration impacts due to the Proposal as well as to provide clarity to those who may be affected by the Proposal. The assessment in Appendix F should be considered as a stand-alone assessment.

The assessment found that:

- Predicted construction noise levels complied with relevant noise management level (NML) at all residential assessment locations during standard construction hours
- Predicted operational noise levels complied with relevant noise targets at all assessment locations during all periods
- Predicted maximum noise levels from operations during the night-time period complied with relevant noise targets at all assessment locations
- Predicted traffic noise associated with haulage of material to and from the Proposal Site complied with relevant noise criteria at all assessment locations

- Construction and operation at the Proposal Site is not anticipated to generate significant vibration impacts off site at any assessment location.

7.4 Addendum Traffic Impact Assessment

Responses from government agencies, as well as the local community received during the exhibition period identified further opportunity to provide detail and clarification on aspects of the Proposal. Subsequently, an Addendum Traffic Impact Assessment has been prepared to provide further detail on the potential impacts to traffic and car parking in the vicinity of the Proposal Site as a result of the Proposal.

Based on the analysis undertaken additional traffic generation of the proposed development and concern over the existing operation of the junction of Jedda Road / Whyalla Place, the proposed development is not expected to compromise the safety or functional performance of the surrounding road network. While at times, it is acknowledged that some vehicles wishing to exit the precinct may experience some delay, waiting for an appropriate gap in Jedda Road traffic to be available, an equal number of vehicles will arrive at the junction with a gap already available and will be able to leave with minimal delay.

Regarding concerns due to loss of on-street car parking spaces and insufficient car parking being provided on-site the assessment found that proposed loss of one on-street car parking space as a result of the construction of the staff car park driveway can be accommodated within the immediate vicinity of the Proposal Site on Whyalla Place. Additionally, there are sufficient car parking spaces on-site to cater for the maximum number of staff anticipated to be on-site at any one time and no reliance on on-street car parking is required.

An Operational Traffic Management Plan was prepared to provide clarity on measures to manage traffic and parking impacts on day-to-day use and to ensure safe vehicle movements to and from the Proposal Site and the frontage road.

8 REVISED COMPILED LIST OF MITIGATION MEASURES

The EIS for the Proposal identified a range of environmental impacts and recommended management and mitigation measures to avoid, remedy or mitigate the identified impacts (Section 16 of the EIS). These mitigation measures have been revised in response to submissions received during the public exhibition. The mitigation measures have also been updated to remove repetition and to assist with the future tracking of requirements should the Proposal be approved, such as the separation of construction and operational mitigation measures. The intent of mitigation measures has been maintained. Amendments to the mitigation measures have been identified having regard to additions (**bold**) and deletions (strikethroughs).

The mitigation measures provided below represent the final mitigation measures to be incorporated into the conditions for the approval of the Proposal, as required by Part 8, Division 5, Clause 192(1)(e) of the EP&A Regulations.

The revised mitigation measures represent the final mitigation measures for the Amended Proposal and are provided in Table 8-1 below.

The 'implementation stage' column of details the timing as to when the specific mitigation measures would be undertaken. For example, a CEMP might be prepared prior to construction, but would not be 'implemented' until the construction or operation phase.

Table 8-1: Revised compilation of mitigation measures

ID	Mitigation Measure	Timing
General		
G1	<p>The Proponent would implement the Project in accordance with the EIA and conditions of approval as provided by the determining authority.</p> <p>A Construction Environmental Management Plan (CEMP) would will be prepared and implemented to guide environmental management and monitoring activities during construction. The CEMP would include specific environmental issue sub-plans to reduce potential impacts and in accordance with relevant commitments identified within the EIS and within this table. A monitoring program shall be conducted throughout the construction period to monitor compliance with the CEMP. Sub-plans to be prepared as part of the CEMP will include:</p> <ul style="list-style-type: none"> • Construction Waste Management Plan • Construction Traffic Management Plan • Construction Noise and Vibration Management Plan • Construction Air Quality Management Plan • Erosion and Sediment Control Plan 	Construction

ID	Mitigation Measure	Timing
G2	<p>An Operational Environmental Management Plan (OEMP) will would be prepared and implemented to guide environmental management and monitoring activities during operation as identified within the EIS in addition to further specific issues identified within the Table. Also refer to Section 16.2 of the EIS. Sub-plans to be prepared as part of the OEMP will include:</p> <ul style="list-style-type: none"> ● Operational Waste Management Plan ● Operational Traffic Management Plan ● Operational Noise and Vibration Management Plan ● Operational Air Quality Management Plan ● Operational Stormwater and Leachate Management Plan ● Emergency Response Management Plan <p>The OEMP will be reviewed annually or more frequently on an as needed basis should there be a change in risk, legislative requirements, or non-compliance.</p> <p>A Pollution Incident Response Management Plan (PIRMP) would be prepared outlining procedures to minimise the risk of a pollution incident on a premises and notification, action and communication procedures to ensure the incident is dealt with safely, and all relevant people and authorities are notified, and kept informed throughout the incident.</p>	Operation
Stakeholder Consultation		
SC1	<p>A The Stakeholder Engagement Strategy has been implemented throughout the delivery of the EIS and would be further developed as part of environmental management documentation for construction and operation of the Project. This would will be updated to provide procedures for communication with stakeholders, procedures for the dissemination of information to the community, identification of the communication channels available for the community and stakeholders to provide feedback on the Project, a protocol for the Project to respond to any enquires or feedback and for managing site visits and property inspections during both construction and operation.</p>	Construction/Operation
Materials and Waste		
MW1	<p>Waste impacts from the Project will be mitigated using both engineering controls and management controls. The engineering controls are part of the design of the Project whilst</p>	Operation

ID	Mitigation Measure	Timing
	<p>management controls to be adopted during operation and construction of the Project are as follows:</p> <ul style="list-style-type: none"> ● Prepare and maintain a Waste Management Plan to be included in the CEMP. ● Prepare and maintain a Waste Management Plan to be included in the OEMP. <p>The Operational Waste Management Plan will include specific details on waste management practices on site, including:</p> <ul style="list-style-type: none"> ● Stockpile handling and management ● Details of soil and sludge handling procedures (e.g. details on how often bioremediated soils will be mixed) ● Sampling and analysis programs for each of the waste streams, including the remediation target levels and monitoring requirements during treatment ● Contingency measures where materials do not respond to treatment methods <p>Prepare and maintain key procedures for Waste Treatment Operations including:</p> <ul style="list-style-type: none"> ● Weighbridge waste acceptance procedure ● Non-confirming waste procedure ● Waste screening procedure ● Batch control procedure ● Material handling procedures – unloading and loading ● Maintenance procedures ● Verify licenses and permits for the handling, transportation, and disposal of waste ● Inspection, monitoring, review and auditing ● Site induction and training 	
MW2	Waste Management to be will be included in the Site Induction.	Construction/operation
MW3	Signs will be erected around the Site providing direction for waste management and adopting the waste management hierarchy.	Construction/operation
MW4	Waste storage areas will to be located within the building and as per the Liverpool City Council DCP Requirements.	Operation

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ID	Mitigation Measure	Timing
MW5	Operations on the Site will be planned Planning to efficiently manage delivery and storage of materials, reduce waste and spoilage.	Operation
MW6	Agreements with suppliers for 'take back' to be arranged where possible.	Operation
MW7	General Waste and recycling skips will be made available and emptied regularly so as not to overflow.	Construction/operation
MW8	All wastes will be managed and properly disposed of in accordance with an appropriately licensed contractor.	Construction/operation
MW9	<p>The following The mitigation measures will be implemented proposed to be in place to prevent waste spreading from the Site include:</p> <ul style="list-style-type: none"> • Loads covered until inside the building and before leaving the building. • A truck and wheel wash would will be installed for trucks prior to exiting the building. • Entry and exit signage to advise transport operators of covering and loading and unloading procedures. • Unloading and loading of waste material will occur within the building. 	Operation
MW10	<p>The mitigation measures proposed to address waste treatment at the Site include:</p> <ul style="list-style-type: none"> • Prepare and maintain a OEMP for the Site Operations. • Prepare and maintain a PIRMP for the Site Operations. • Prepare and maintain a SAQP for Soils Treatment. • Prepare and maintain a SAQP for Waste Water. <p>The OEMP, PIRMP and SAQP will be reviewed annually or more frequently on an as needed basis should there be a change in risk, legislative requirements, or non-compliance</p> <p>Sampling and Analysis Quality Plans (SAQPs) will be prepared for the treatment of soils and wastewater at the Site. The SAQPs will be reviewed annually, or more frequently, on an as needed basis should there be a change in risk, legislative requirements, or non-compliance.</p>	Operation
MW11	A feasibility application will be lodged with Sydney Water during detailed design that will detail the indicative water usage and wastewater discharge for the Proposal	Detailed design

ID	Mitigation Measure	Timing
Traffic and Transport		
TT1	A construction and operation traffic management plan would be prepared prior to construction and operation of the Project, which would be included within the CEMP and OEMP. These plans would include standard traffic management measures including hours of access, vehicle circulation and parking.	Construction/Operation
Noise and Vibration		
NV1	<p>While the Project is below relevant noise criteria requirements, the following standard measures are proposed to further mitigate noise associated with the Project.</p> <p>A Noise Management Plan will be completed for construction and operation and include:</p> <ul style="list-style-type: none"> • Identification of the surrounding noise-sensitive land use. • A description of working hours and practices to minimise noise. • A list of high noise equipment or processes along with mitigation / minimising measures where possible. • A community complaints register and written process for handling complaints. • Contractor involvement. A description of noise generating activities will be discussed in the morning toolbox with opportunities to minimise noise impacts identified and implemented workers to be involved in reducing the effects where possible. 	Construction/Operation
NV2	Proposed plant and equipment will be selected and maintained to achieve the sound power levels outlined in the Noise Assessment (Appendix E).	Operation
NV3	Plant and equipment will be maintained and not generate excessive noise.	Operation
NV4	Broadband reversing alarms will be utilised in place of traditional beeper reversing alarms.	Operation
NV5	Machinery will be operated in a manner that reduces maximum noise level events.	Operation
NV6	Site awareness training / environmental inductions will include a section on noise mitigation techniques / measures to be implemented when on the Site.	Operation
NV7	While vibration from construction and operation are not predicted to cause offsite impacts. The Construction Noise and Vibration Management Plan will review potential vibration impacts and prescribe vibration monitoring, if vibration impacts are predicted. If	Construction

ID	Mitigation Measure	Timing
	<p>necessary, monitoring can be undertaken during the construction phase to assess potential impacts</p>	
<p>Air Quality, Odour and Greenhouse Gases</p>		
<p>AQ1</p>	<p>Project mitigation measures during construction will include development of and adherence to a A Construction Air Quality Management Plan (CAQMP) to be included in the CEMP. The CAQMP will include:</p> <ul style="list-style-type: none"> • Identification of the surrounding land use and local stakeholders. • Displaying the name and contact details of person(s) responsible for air quality at the site boundary. • Recording all air quality complaints, identify causes and incorporating measures to reduce emissions in a timely manner. • Include all site staff at the morning toolbox in a discussion for planning the workday around dust suppression and minimisation. • Structure high dust generating activities (earthworks and demolition) around days with low windspeed and stop or pause these activities during dry and windy conditions. • Loads shall be covered on trucks transporting material to and from the construction site. • Spray the site regularly to suppress dust and use water-associated sweeper to reduce the potential for material to be tracked off site. • Cover and weight stockpiles to prevent wind erosion when they are inactive. 	<p>Construction</p>
<p>AQ2</p>	<p>An Operational Air Quality Management (OAQMP) plan will be developed for the Proposal. The OAQMP will:</p> <ul style="list-style-type: none"> • Establish procedures to routinely maintain and test operation of the HVAC and emissions control systems • Procedures for air quality monitoring • Minimise the fugitive emissions from the Site • Identify contingency measures to minimise air quality impacts in the event of failure of the HVAC and emissions control systems • Prevent the idling of mobile plant and haul trucks when not in use 	<p>Operation</p>

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ID	Mitigation Measure	Timing
	<ul style="list-style-type: none"> Material loading / unloading and handling procedures designed to reduce fugitive dust emissions, e.g. high-speed roller-doors required to be closed during material loading / unloading and handling. 	
AQ3	<p>Particulate matter, VOC and odour emissions from the Project will be mitigated using both engineering controls and management controls. The engineering controls are part of the design of the Project whilst management controls to be adopted during operation and construction of the Project are as follows:</p> <p>Operation of Emissions control devices will be operated according to their manufacture's specifications.</p>	Operation
AQ4	Regular preventative maintenance of emissions control devices according to their manufacture's specifications will be carried out .	Operation
AQ5	A Truck and wheel wash station at the Waste Treatment Facility exit will be installed to reduce soil track-out and generation of fugitive dust outside the building envelope.	Operation
AQ6	The need for fogging suppression systems, where deemed necessary, will be determined during detailed design. This potentially includes Compartment 3 Treatment Bays and other areas as needed.	Operation
AQ7	Compartment 3 on/off switches will be used to focus air collections in the active 1 of 5 Treatment Bays being used for stockpile bay hood to collect, and send for treatment, approximately 95% of the total air flow through the space.	Operation
AQ8	Fabric side curtains and front drop curtain to 4 m will be installed on the Bioremediation Bays are designed and will be used to contain minor contaminant generation from handling and turning process.	Operation
AQ9	Overall, † The building compartments will be maintained at > -5 Pascals (Pa) while in 'daily treatment mode'. When in 'after hours mode', the building can exhaust air system from each compartment shall be reduced and associated outside air inlet dampers closed off to maintain > - 5 Pa whilst saving energy.	Operation

ID	Mitigation Measure	Timing
AQ10	<p>To validate the model predictions from the AAQIA (Appendix EF of the submissions report), it is proposed that post-commissioning stack testing be undertaken during the first year of operation of each Stage. This post-commissioning testing will include:</p> <ul style="list-style-type: none"> • Stack testing upstream and downstream of the air emissions control system to validate the manufactures-stated PM and VOC removal efficiencies. • Stack testing for size resolved PM (PM_{2.5} and PM₁₀) and a metals in PM assay while treating bulk soils or wastes containing heavy metals. • Stack testing for VOCs or odour while treating wastes containing hydrocarbons, industrial solvents and/or odorous wastes. <p>If post-commissioning stack testing indicates the model predictions are conservative, then stack testing will be repeated on a once-in-three years basis.</p>	Operation
AQ11	<p>If post-commissioning testing indicates that there is the potential for air impacts, then fenceline or local air quality monitoring is proposed to be undertaken. This air quality monitoring could include, but may not be limited to, the following:</p> <ul style="list-style-type: none"> • Size resolved fenceline particulate matter monitoring (PM_{2.5} and PM₁₀) • Dust deposition gauge monitoring; • Hydrocarbon or VOC monitoring or; • Total reduced sulfur compound or odour monitoring. 	Operation
AQ12	<p>Energy consumption associated with the generation of GHG for the Project can will be limited by the following mitigation measures, which are consistent with mitigation measures identified for Air Quality:</p> <ul style="list-style-type: none"> • Use of fuel-efficient machinery, equipment, and plant • Consider energy rating when purchasing new machinery and equipment • Implementing a maintenance plan for fuel and electricity powered machinery and equipment • Training to and implementing energy conservation practices by all staff • Consider use of solar energy where feasible. 	Operation

Soil and Water

ID	Mitigation Measure	Timing
SW1	<p>To minimise potential impact of the Project on the water related aspects of the adjacent receiving environment:</p> <p>The CEMP would include environmental procedures related to implementing a stormwater erosion and sediment control strategy and plan to be prepared prior to construction and implemented during construction.</p> <p>The CEMP will include an Erosion and Sediment Control Plan that will be prepared in accordance with <i>Managing Urban Stormwater: Soils and Construction (Landcom, 2004)</i>.</p>	Construction
SW2	<p>The OEMP wouldwill outline environmental procedures during operation including development and implementation of the proposed post-development stormwater management strategy and plan an Operational Site Water Management Plan that will include the following measures:</p> <ul style="list-style-type: none"> • Implementation of the proposed post-development stormwater management strategy and plan • Recycle and reuse the rainwater for the Site's activities to reduce the portable water use • Allow no process water mix into the Site's stormwater system through: <ul style="list-style-type: none"> - All storage and handling of materials undertaken inside the Waste Treatment Facility - Bunding the doorways of the Waste Treatment Facility with drive over bunding - Undertake wheel and truck wash down inside the build prior to exit with water collected and directed to the wastewater treatment plants - Leachate collection within the Waste Treatment Facility - Overflow protection on all tanks - Bunding of the waste water treatment plants in accordance with Australian Standards - Storage of chemicals and dangerous goods in accordance with Australian Standards - No Facility delivery truck wash down inside the Waste Treatment Facility - Material Safety data sheets maintained on site for all chemicals - Bunds water-proof tested on a regular basis and repair implement as needed and procedures documented in the OEMP - Appropriately lined Pre-Treatment Pits and regularly inspected and epoxy liner and concrete repairs implement as needed and procedures documented on the OEMP 	Operation

ID	Mitigation Measure	Timing
	<ul style="list-style-type: none"> - Spill kits located adjacent to potentially contaminating activities and procedures would be in place for Spill Management and documented in the OEMP. • Installation of water efficient fixtures to conform to Council requirements. • No use of groundwater by the Project. • Quarterly monitoring of the groundwater and surface water quality. 	
SW3	<p>During operation the following design, management and mitigation measures are proposed to minimise potential operational impacts of the Project on the water related aspects of the adjacent receiving environment:</p> <p>The minimum finished floor level for the Project be 23.6 mAHD, which is identified by Council as the maximum 1% AEP flood level at the site of 23.1 mAHD plus 0.5 freeboard allowance.</p> <p>Any on-site parking will be located above the 1% AEP flood level of 23.1m AHD.</p>	Operation
SW4	<p>Extension to the existing buildings or modifications of the exterior walls will be constructed with flood-compatible building components below the probably maximum flood (PMF) level. Material selection will be confirmed by an engineers report that demonstrates it can withstand the forces of floodwater, debris and buoyancy.</p>	Construction
SW5	<p>A structural assessment will be undertaken during design development to determine the suitability of the existing and proposed fences/exterior walls during PMF conditions at the Site.</p>	Construction
Hazards and Risk		
HR1	<p>A Pollution Incident Response Management Plan (PIRMP) would will outline procedures to minimise the risk of a pollution incident on the premises and notification, action, and communication procedures to ensure the incident is dealt with safely, and all relevant people and authorities are notified, and kept informed throughout the incident. The PIRMP will be reviewed annually or more frequently on an as needed basis should there be a change in risk, legislative requirements, or non-compliance.</p>	Construction/operation
HR2	<p>The storage and handling of dangerous goods would be as per the Dangerous Goods license for the Site and be banded and stored in accordance with the relevant Australian Standards including:</p>	Operation

ID	Mitigation Measure	Timing
	<ul style="list-style-type: none"> Corrosive substances (Class 8) to be stored and handled by following the methods outlined in AS 3780-2008, The storage and handling of corrosive substances. Storage and handling of Class 5.1 oxidizing substances to be undertaken in accordance with AS 4326-2008, The storage and handling of oxidizing agents. 	
Human Health		
HH1	<p>Human health mitigation measures include relevant measures identified by other technical issues in addition to the Project specific human health mitigation and management measures including:</p> <p>Quarterly personal and ambient monitoring will be conducted to verify that engineering controls outlined above are effective in controlling worker exposure to contaminants.</p>	Operation
HH2	<p>Management of dermal Dermal contact and ingestion will be managed through standard personal hygiene practices, personal protective equipment, clothes change policy and the use of containerised plant, mobile plant and enclosed systems to minimise physical contact with the waste streams.</p>	Operation
HH3	<p>Emergency showers and eyewash stations will be installed and maintained in accordance with AS4775 Emergency eyewash and shower equipment.</p>	Operation
HH4	<p>A structured, pre-employment medical and risk-based health surveillance program will be implemented for the Project.</p>	Operation
HH5	<p>During the first year of operation a competent, independent occupational hygienist will design and conduct quarterly personal and ambient monitoring for silica dust, dust and vapours. The program will be reviewed at the end of the first year and adjusted based on the outcome of the results and site observations.</p>	Operation
HH6	<p>All employees will be required to complete the Proponent's onboarding and induction system that includes health and safety training. The induction will be site-specific and developed as part of the OEMP for the Project, including the key hazards within each area of the Waste Treatment Facility and critical controls. This induction will include the following key related elements:</p> <ul style="list-style-type: none"> Dangerous goods (storage, handling and use) Contaminants (e.g. asbestos, PAHs, dust, vapours) Use and maintenance of personal protective equipment 	Operation

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ID	Mitigation Measure	Timing
	<ul style="list-style-type: none"> • Personal hygiene and clothes change policy • Incidents and first response • Personal decontamination (safety showers) • Spill response • Site critical controls • Workplace monitoring 	
HH7	Signage will be provided within the Waste Treatment Facility that identifies process areas, key hazards and protective equipment requirements.	Operation
HH8	Task based training will be provided and include a competency assessment process with personnel not being permitted to work unsupervised until deemed competent.	Operation
HH9	Ongoing education and awareness will be provided through the health & safety alerts and toolbox meetings.	Operation
HH10	The Proponent will maintain their health and safety management system developed to align with AS/NZS ISO 45001:2018 Occupational Health and Safety Management Systems – Requirements with Guidance for use.	Operation
Fire and Incident Management		
FIM1	All aspects of the Fire Safety Strategy as identified within Appendix K (of the EIS) will be adopted and proposed fire safety measures will meet the relevant Performance Requirements of the NCC. In addition, the following mitigation and management measures specific to fire and incident management will be implemented for the Project.	Operation
FIM2	<p>The Project will be consistent with FRNSW Guidelines including:</p> <ul style="list-style-type: none"> • Access for firefighters and emergency vehicles. • Building design. • Sprinkler and Fire Hydrant System design (including appropriate water pressure). • Fire detection and alarm system. • Smoke Hazard Management. • Fire Water Run-Off Containment. • Stockpile location and size. 	Operation

ID	Mitigation Measure	Timing
FIM3	<p>An Emergency Management Plan should will be developed in accordance with Hazardous Industry Planning Advisory Paper No 1: Emergency Planning (DPIE, 2011), and all staff will receive training in emergency procedures including the Emergency Control Response Response Procedures and delegated fire wardens, the evacuation routes, and the procedures to follow in a fire event. Flood emergency management will be incorporated into the plan with a shelter-in-place strategy adopted for the Site during any flood events. This would will be documented within and Emergency Management Response Response Plan (EMRP) as part of the OEMP for the Project and be in accordance with Work Health and Safety (WHS) legislation and AS3745:2010.</p>	Operation
FIM4	<p>Portable fire extinguishers are to will be provided throughout the building in accordance with the NCC and selected, located, and distributed in accordance with AS2444:2001.</p>	Operation
FIM4	<p>A dedicated smoke exhaust system in Fire Compartment 1 and 3 will be implemented to comply with the requirements of Clause 3 of Specification E2.2b of the NCC with a minimum operating duration of at least 2 hours. The exact smoke exhaust rates shall be determined through detailed design.</p>	Operation
FIM5	<p>Primary firewater containment shall will be from process bunding pits and main floorplate within the Waste Treatment Facility building. This shall be achieved by bunding entry points with drive-over bunding at the truck entry and exits. This primary containment must be capable of containing:</p> <ul style="list-style-type: none"> • Hydrants operating at 30 L/s for a minimum of 4 hours and • High hazard sprinklers operating for a minimum of 2 hours – flowrate to be advised by fire services engineer and • Drenchers operating for a minimum of 2 hours – flowrate to be advised by fire services engineer. 	Operation
FIM6	<p>Stockpiles shall will not exceed 4 m in height. Fire separating masonry walls shall extend at least 1 m above the top of a stockpile and at least 2 m beyond the outermost stockpile edge. The boundary limits of stockpiles must will be permanently marked. It is noted for fire purposes these requirements shall only apply to each 100 m³ stockpile. Internal partitioning proposed for operational purposes need not comply with these requirements.</p>	Operation

ID	Mitigation Measure	Timing
FIM7	Each accessible side of a stockpile shall will have at least 6 m of clear unobstructed space to reduce the risk of fire spread.	Operation
FIM8	Internal stockpiles shall will not impede access to exits and a minimum 1 m path must be maintained past stockpiles to ensure requires paths of travel are accessible.	Operation
FIM9	The fire safety systems should will be tested and maintained in accordance with Australian Standard AS1851 or other relevant testing regime.	Operation
FIM10	The ERP An Operations Plan shall The ERP An Operations Plan shall and Operational Waste Management Plan will be developed by the Site operator as per Section 8.6 of FRNSWs Guideline – Fire Safety in Waste Facilities.	Operation
FIM11	An Emergency Services Information Package must will be provided to emergency service personnel in accordance with per Section 9.4.2 of FRNSWs Guideline – Fire Safety in Waste Facilities.	Operation
Other: Heritage		
H1	In the unlikely event that Aboriginal or suspected Aboriginal archaeological material is uncovered during the development, then works in that area are to stop and the area cordoned off. The project manager will contact DPE or other regulatory body to make an assessment as to whether the material as classed as Aboriginal object/s under the <i>National Parks and Wildlife Act 1974</i> and advise on the required management and mitigation measures. Works are not re-commenced in the cordoned area until heritage clearance has been given and/or the required management and mitigation measures have been implemented.	Construction/Operation

9 CONCLUSION

Hi-Quality Waste Treatment Services Pty Ltd (the Applicant) is seeking approval for the construction and operation of a Waste Treatment Facility (WTF) (SSD 9346594) to process and treat contaminated soils, sludges and liquid wastes to a level suitable for reuse or disposal to a landfill or sewer, with a throughput capacity of up to 270,000 tonnes per annum (tpa) (the Proposal) at 9-13 Whyalla Place, Prestons NSW (Lot 103 DP 866530) (the Proposal Site).

The relevant Environment Impact Assessment (EIS) for the Proposal was publicly exhibited between 19 November 2021 and 16 December 2021.

This submissions report has been prepared in accordance with Part 3, Division 5, Clause 59(2) of *Environmental Planning and Assessment Regulations 2021* (EP&A Regulations) to address comments raised by both government agencies and the community during the public exhibition of the EIS. This submissions report provides further information and justification for the Proposal in order to respond to and address the submissions received.

This submissions report also outlines an amendment to the Proposal as exhibited in the EIS and concludes that the amendment would result in negligible additional environmental impact over those outlined in the EIS.

The mitigation measures provided within the EIS have been updated to respond to the submissions received and further design refinements (refer to Section 8 of the submissions report).

Overall, the assessment identifies that the Proposal would, subject to the implementation of updated mitigation measures, result in no substantial environmental impacts in addition to those identified within the EIS.

10 REFERENCES

Department of Planning, Industry and Environment (DPIE), 2021. *State significant development guidelines – preparing a submissions report: Appendix C to the state significant development guidelines.*

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EPA, 2017. *Noise Policy for Industry*

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Appendix A. Submissions Register

Group	Submitter number	Name
Organisation	1	Campbell Electrical Service P/L
Individual	2	Joe Santagelo
Individual	3	Name withheld
Organisation	4	Ferenc Vastag
Organisation	5	Prestige Concrete Pumping Services Pty Ltd
Organisation	6	GSP Print
Individual	7	Name Withheld
Organisation	8	Boka Investments Pty Ltd
Organisation	9	La-z-Boy Australia Pty Ltd
Organisation	10	Strata Plan 51887
Organisation	11	Strata Plan 64613
Organisation	12	Strata Plan 64023
Organisation	13	Strata Plan 58668
Organisation	14	Strata Plan 58663
Organisation	15	Pharmacare Operations No 1 Pty Ltd
Organisation	16	Minetek Pty Ltd
Individual	17	Stephen Dobell-Brown
Individual	18	Alexander and Vanda Ghignone

Appendix B. Updated Project Description

Appendix C. Operational Environmental Management Plan

Appendix D. Flood Assessment

Appendix E. Revised Air Quality Impact Assessment

Appendix F. Revised Noise and Vibration Impact Assessment

Appendix G. Addendum Traffic and Parking Impact Assessment

Appendix H. Site Plan

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