



DOC16/357994-02

Ms Kate Masters
A/Team Leader
Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

EMAIL & STANDARD POST

Dear Ms Masters

I am writing to you in relation to the proposed expansion of the Hearne St Mortdale Resource Recovery Facility (SSD 7421), from 30,000 tpa to 300,000 tpa. It is also proposed to permit waste movements in and out of the facility 24 hours per day.

Further to the letter sent to you on 29 August 2016, the Environment Protection Authority ("EPA") now provides additional comments in relation to the Air Quality Impact Assessment ("AQIA") provided by the Proponent. The EPA has reviewed the AQIA and has determined that it does not have sufficient information to adequately assess the potential air impacts from the proposal. Therefore, the EPA is unable to provide recommended conditions of approval at this stage. The EPA's comments in relation to the AQIA are provided in Attachment A.

If you have any questions in relation to this matter, please contact Deanne Pitts on (02) 9995 5752.

Yours sincerely

A handwritten signature in black ink, appearing to read 'CF', with a large loop at the end.

2 September 2016

CELESTE FORESTAL
Unit Head Waste Compliance
Environment Protection Authority

Att: Attachment A – EPA's comments on AQIA

ATTACHMENT A

The EPA has reviewed the documents placed on Public Exhibition for the expansion of the resource recovery facility at Hearne St, Mortdale from 30,000 tpa to 300,000 tpa. It is also proposed to permit waste movements in and out of the facility 24 hours per day.

The Proponent has not provided sufficient information to adequately assess the potential impacts from the proposal. The Proponent needs provide the following information:

AIR

The EPA has reviewed the Air Quality Impact Assessment (AQIA) (SLR, 2016)¹ prepared for the proposed expansion to the Resource Recovery Facility at Mortdale, NSW. The EPA notes the following from the assessment:

- Annual average throughput used to assess against annual average impact assessment criteria, and a maximum daily throughput utilised to assess against short term (24 hour average) impact assessment criteria;
- Not all information utilised to estimate emission rates for the modelling assessment has been included in the assessment report. The EPA cannot confirm or reproduce the emission estimates from the information provided.

The assessment predicts:

- No exceedances of the impact assessment for Total Suspended Solids, deposited dust, PM₁₀ (annual averaging period) at residential and industrial receptors. No exceedances of the PM_{2.5} (annual averaging period) National Environment Protection Measure (NEPM) standard at residential and industrial receptors;
- A maximum PM₁₀ (24 hour) incremental ground level concentration of 11.3 ug/m³ at residential receptors, with a cumulative ground level concentration of 46.6 ug/m³. No predicted exceedances of the impact assessment criteria for PM₁₀ are noted at residential receptors;
- A maximum PM_{2.5} (24 hour) incremental ground level concentration of 2.1 ug/m³ at residential receptors with a cumulative ground level concentration of 21.6 ug/m³. No predicted exceedances of the NEPM standard for PM_{2.5} are noted at residential receptors;
- An exceedance of the impact assessment criteria for PM₁₀ (24 hour) at one of the industrial receptors. An incremental ground level concentration of 29.8 ug/m³ is predicted, with a cumulative impact of 57.0 ug/m³.

The EPA considers that there is likely to be some conservativeness within the modelling predictions assessing against 24 hour impact assessment criteria. Specifically:

- A maximum daily throughput (20,000 tonnes) was assumed for every day of the modelling scenario, which is unlikely to occur in reality given the proposal is for 300,000 tonnes per annum;
- No accounting for management strategies that could be incorporated into an Air Quality Management Plan for the site; and
- The assessment states that no control factors have been adopted for estimating emissions from material handling activities undertaken within the proposed building. However as no detailed emission inventory has been presented, this cannot be confirmed.

¹ SLR, 2016 – *Resource Recovery Facility – Mortdale, 20 Hearne Street, Mortal Air Quality Impact Assessment State Significant Development Application*, dated 28 June 2016

Based on the above, the EPA is unable to adequately assess the potential impacts from the proposal and requires that the Proponent provides the following information:

1. the Proponent must confirm emission estimates and provide a tabulated emission inventory, outlining all input parameters utilised to estimate emissions; and
2. Where exceedances of the EPA's impact assessment criteria for particles are predicted, the modelling assessment should be revised to include proposed emission controls which will be adopted at the premises.