



DOC19/889378-1

Bianca Thornton
Planning Officer
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2000

18 October 2019

Dear Ms Thornton,

Modification Application for Spring Farm Advanced Resource Recovery Technology Facility (MP 05_0098 MOD 6) - Notice to Supply Further Information.

On 14 August 2019 the NSW Environment Protection Authority (**EPA**) wrote (DOC19/300721-1: **EPA Comments**) to the Department of Planning, Industry and Environment (**DPIE**) providing comments on the Response to Submissions on the modification application for Spring Farm Advanced Resource Recovery Technology Facility (**MP 05_0098 MOD 6**) at Barrow Rd Spring Farm (**the Premises**).

DPIE has provided the EPA with SUEZ correspondence (**SUEZ Addendum**) dated 27 September 2019 clarifying the questions raised in EPA Comments. EPA has reviewed the SUEZ Addendum and notes the following.

Site operational hours

SUEZ has acknowledged and agreed with the EPA's comment regarding condition L4.1 of EPL 12588. EPA makes no further comment on this aspect.

Noise impact assessment

The EPA Comments noted the MP 05_0098 MOD 6 Noise Assessment did not assess noise from vehicles arriving at the premises between the hours of 6am and 7am (including those at the weighbridge). The EPA Comments recommended the applicant provide assessment of the noise impact of vehicles arriving at the Premises, inclusive of the use of the weighbridge, for the period 6am to 7am.

Hibbs and Associates (Ref: S10252-L01) updates its environmental noise impact assessment supporting MP 05_0098 MOD 6 by revising the noise model for truck movements between 6am and 7am. Hibbs conclude:

"The predicted noise immissions are 1 dB lower than those predicted in the 2018 assessment because the expected truck flow is slightly lower. The overall noise impacts are lower because they occur later in the morning. Based on the above, the conclusion of the assessment remains the same, that is with uncertainty considered, the results of the Environmental Noise Assessment are sufficiently accurate to conclude that noise emissions from Spring Farm SFARRF would comply with the requirements of Condition 2.13 of its

planning approval if NSW DPE consent to SUEZ Recycling & Recovery Pty Ltd's application for a change in the operational hours."

The EPA is satisfied with Hibbs and Associates assessment and has no further concerns in this regard.

Odour Modelling Assessment & Air Quality Assessment

The EPA Comments noted that the Odour Assessment *Table 6.1: Odour Emission Rates Used For Each Site* includes a specific odour emission rate (SOER) for the tank farm of an assumed 0.06 ou.m³/m²/s. This is reduced from an assumed 0.108 ou.m³/m²/s used in the MOD 5 assessment. The EPA Comments requested the applicant clarify why the SOER for the tank farm has varied between these applications.

SUEZ Addendum notes the 0.06 ou.m³/m²/s SOER has been adopted from the Camden Soil Mix greenwaste leachate pond data produced for the 2012, Office of Environment & Heritage (OEH) report titled "*Odour Emissions and Mitigation Study – Camden Soil Mix, Mount Annan, NSW*".

SUEZ correspondence of 17 June 2019 "*Waste Water Process Plant*" details the processing of proposed liquid waste at the Premises. The processing of the proposed industrial liquid wastes will occur in enclosed vessels, posing little risk of odour emission.

It is unclear to the EPA whether the 2012 Camden Soil Mix leachate odour emission data reasonably reflects the odour emissions from the treatment of the proposed liquid wastes in the tank farm. However, considering the industrial liquid waste processing will occur in enclosed vessels, the EPA accepts the risk of problematic emissions in this case is low.

The EPA accepts the MP 05_0098 MOD 6 odour modelling assessment and recommends post-commissioning validation of the odour emissions as a condition of consent.

Industrial liquid waste

The EPA Comments requested SUEZ provide further information regarding the industrial liquid wastes to be received at the Premises. SUEZ Addendum has provided sufficient information regarding the following industrial liquid wastes:

- Surface active agents (J120);
- Waste Oil / water emulsions (M250); and
- Waste from production of resins (F110) – Hospitals.

When varying EPL 12588 to allow the receipt of industrial liquid wastes, the EPA will limit the industrial liquid wastes to those detailed in the SUEZ Addendum. EPA will also request further information from SUEZ at that stage regarding the character of the industrial liquid wastes listed above.

Questions

Should you have any questions regarding this matter, please contact Damien Rose on 9995 5586.

Yours sincerely



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Environment Protection Authority