



DOC20/390460

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

22 May 2020

Dear Ms Thornton,

**Modification Application for Spring Farm Advanced Resource Recovery Technology Facility (MP 05\_0098 MOD 6) - Liquid Waste-water Treatment Plant**

On 18 October 2019 the NSW Environment Protection Authority (**EPA**) wrote to the Department of Planning, Industry and Environment (**DPIE**) providing further comments (see DOC19/889378-1) on the modification application for Spring Farm Advanced Resource Recovery Technology Facility (**MP 05\_0098 MOD 6**) at Barrow Rd Spring Farm (**the Premises**) which proposes modifications to the site operational hours and the processing of industrial liquid wastes at the Premises (the Proposal).

**The EPA cannot support Proposal in its current form**

The EPA still has significant concerns in relation to this Proposal. The EPA is concerned that insufficient information has been provided to conduct an adequate assessment of the potential impacts from the proposed processing of industrial liquid wastes. Therefore, it is the EPA's position that it cannot support the Proposal in its current form. For the benefit of the applicant the EPA has provided further comment on the additional information in Attachment 1 to this letter. The comments below should also be read with consideration to the EPA's previous correspondence dated 21 March 2019, 18 October 2019 and 9 March 2020.

**Operating hours**

In correspondence DOC19/889378-1 the EPA raised no further concerns regarding the Proposal to modify the operating hours and the associated noise impact assessment and is satisfied that this aspect of the application can be approved.

**Processing industrial liquid waste**

On 9 March 2020 the EPA wrote to DPIE providing further comments on MP 05\_0098 MOD 6 (see DOC20/175122-1). In DOC20/175122-1 the EPA advised that the applicant had not provided sufficient information for the EPA to make an adequate assessment of the Proposal to process industrial liquid wastes at the Premises.

To facilitate the matter the EPA and DPIE met with the applicant to discuss the information that would be required to support the application. Following these discussions, the applicant supplied additional information to DPIE on 4 May 2020. The EPA has reviewed the additional information in the

applicant's submission dated 4 May 2020 and has determined the applicant has not provided sufficient information or detail for the EPA to make an adequate assessment.

Should DPIE or the applicant have any queries regarding this assessment, I can be contacted on 9995 5646.

Yours sincerely

A handwritten signature in black ink, appearing to read 'T.W.', is positioned above the printed name.

**TREVOR WILSON**  
**Unit Head Waste Compliance**  
**Environment Protection Authority**

## **Attachment 1**

### **Odour Impact Assessment**

On 18 October 2019 the EPA commented that as the industrial liquid waste processing will occur in enclosed vessels the EPA accepts the applicant's advice that the risk of problematic emissions is low and that conditions relying upon post-commissioning validation of the odour emissions may be reasonable.

Since then, the EPA has investigated a significant spike in complaints from residents in Spring Farm and Mount Annan areas alleging they are experiencing odours generated by the SUEZ waste premises at Spring Farm.

On the 2 March 2020 EPA Authorised Officers identified offsite odour associated with the Spring Farm tank farm (subject of this MOD) that matched the character described in some of those complaints. The EPA is concerned that the receipt of Industrial Liquid Wastes may increase the risk of odour impacting the surrounding residential suburbs.

Considering the odour impact experienced by the residents of Spring Farm and Mount Annan, the EPA cannot consider recommending approval without first having reviewed a satisfactory and representative Odour Impact Assessment produced in accordance with *EPA's Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW (EPA's Approved Methods)*.

On 9 March 2020 the EPA commented that the applicant had not provided an Odour Impact Assessment, produced in accordance with EPA's Approved Methods that included emissions relevant to the industrial liquid wastes detailed in the Proposal. Those proposed industrial waste liquids included grease trap waste, mineral oils, surface active ingredients, waste inks, dyes, fire wash water, residuals from industrial waste disposal, photographic chemicals, waste resin and latex. EPA requested this assessment be based on representative odour emissions data from a comparable plant, such as SUEZ' Camellia facility or similar.

On 4 May 2020 (q24) the applicant notes that they have provided ERM's April 2019 (MOD 6) Odour Assessment. ERM's Odour Assessment provides insufficient detail as follows:

- ERM's April 2019 (MOD 6) Odour Assessment characterised odour emissions from the tank farm by relying upon greenwaste compost leachate pond data collected from Camden Soil Mix. This odour will likely differ from that generated in the treatment of grease trap waste, mineral oils, surface active ingredients, waste inks, dyes, fire wash water, residuals from industrial waste disposal, photographic chemicals, waste resin and latex.
- ERM's April 2019 (MOD 6) Odour Assessment (p4) notes correctly *"that the modelled odour assessment criteria are not intended to achieve no odour. They are concerned with controlling odours to ensure offensive odour impacts will be effectively managed."* ERM is correct in that whilst modelling may demonstrate the probabilities of low odour impact, the community may still experience impact, and the EPA may still identify instances whereby a licensed facility breaches its licence conditions and section 129 of the *Protection of the Environment Operations Act, 1997 (the Act)* by causing offsite offensive odour.
- ERM's April 2019 (MOD 6) Odour Assessment (Figure 7.1) provided odour modelling contours that show no odour impact from the combined SUEZ waste facilities to the nearby suburb of Mount Annan and that the facilities only partly impact the Spring Farm residences. This modelling does not reflect the recent offensive odour impact experienced in these suburbs that the EPA has confirmed is caused by the SUEZ Spring Farm waste facilities. The EPA is addressing this matter in separate regulatory action.

Prior to consideration of a new application for this Proposal, it is recommended the applicant and its consultants meet with the DPIE and EPA to discuss measures SUEZ will take to ensure any future Odour Impact Assessment is conducted in accordance with EPA's Approved Methods and:

- relies upon representative data,
- considers all odour emission points (including pressure relief, decanting and cleaning of enclosed lines and vessels) and
- provides satisfactory odour mitigation measures that addresses the odour impact experienced by the residents of Spring Farm and Mount Annan.

### **Bunding**

On 4 May 2020 the applicant provided Appendix E Spring Farm Tank Farm Final Hazard Analysis Risk Assessment Report (12 April 2016). A recommended outcome of that Risk Assessment was that SUEZ confirm whether the facility bunding is to current standards. This should be confirmed. Of note, the EPA would ask the applicant to check all bunding is constructed to be impervious to the liquids proposed to be stored onsite and constructed so that any leaks, including pressurized or from elevated lines and vessels will be contained.

### **Discharge to sewer**

The applicant is progressing towards obtaining a Trade Waste Agreement with Sydney Water and has attached correspondence containing certain analytes at Appendix D 4 May 2020. Prior to assessing any subsequent application, the applicant should provide correspondence with Sydney Water confirming the characterisation, range of potential contaminants, treatment regime, sampling, discharge analytes and discharge criteria is suitable for the proposed suite of influent industrial liquid wastes being discharged to their system.

### **Response to EPA questions 9 March 2020**

On 4 May 2020 the applicant has numerically detailed its response to the EPA questions of 9 March 2020. EPA has reviewed this response as follows:

1. The applicant did not provide sufficient specific detail to answer the EPA's question.
2. The applicant did not detail the physical and chemical characteristics of conforming liquids.
3. Answered.
4. The applicant described its process but as with Q2 did not detail the non-conforming limits of influent liquids.
5. Answered.
6. The applicant relied on the assertion that the proposed treatment matches their Camellia plant. Considering this plant has been closed with the intention of it being replaced by the proposed facility, a more rigorous demonstration of its suitability was appropriate.
7. This did not answer the EPA's question.
8. The applicant described the total volume approved without providing the detail requested.
9. Answered.
10. The ERM MOD 6 Odour Assessment states (p12) the odour emissions rates adopted are the same as in MOD 5. Section 6.1.1 (p15) of the MOD 5 Odour Impact Assessment states "*Measurements were not made at the tank farm as these tanks are enclosed.*" Both documents rely upon the assumption that the tank farm will create specific odour emissions comparable to the Camden Soil Mix greenwaste leachate dam. On 9 March 2020 the EPA rejected reliance upon this data and asked for a more representative assessment of the liquid waste treatment plant. The applicant has not provided any further information in this regard.
11. Answered.
12. Answered.
13. No further detail required.
14. The applicant did not provide sufficient detail regarding the factors that may impact the effectiveness of the treatment process.
15. No further detail required.
16. Answered.
17. The applicant has not provided a description of the storage, handling, transfer, processing collection and disposal of the filter cake.

18. EPA is concerned that the applicant does not propose any separation of recoverable materials for reuse (eg. the oily fractions) and would consider this appropriate in a future application.
19. The applicant has partly answered this question by detailing the influent analytes but not the conforming concentrations.
20. Answered.
21. Answered.
22. Answered.
23. Answered.
24. Refer to Odour Impact Assessment above.
25. MOD 5 did not describe the industrial liquids proposed in MOD 6.

Whilst the EPA has assessed whether the applicant has answered its questions, any future application should not rely upon the provided information as it is generally insufficient. The applicant and its consultants should meet with DPIE and EPA prior to producing further submissions to better understand the requirements of assessment for this Proposal.

**Adequate documentation and version control.**

Any future application to be considered by the EPA will require submission of an Environmental Assessment that includes current and consistent supporting documentation. Subsequent clarifications are to be made to that document to ensure consistency and clarity of what is proposed. EPA will not consider reference to previous assessments.