

ASSESSMENT REPORT

Section 75W Modification – Garden Organics Plant Input Jacks Gully Alternate Waste Treatment Facility (05_0098 Mod 4)

1. BACKGROUND

The Macarthur Resource Recovery Park (MRRP) (formerly known as the Jacks Gully Waste and Recycling Centre) is located off Richardson Road, Narellan, in the Camden local government area (refer to Figure 1).

Camden Council originally operated the site as a putrescible landfill until 1975 when WSN Environmental Solutions (WSN, the Proponent) took over the operation of the site. Since this time, Camden Council has issued development consent for a Materials Recycling Centre (MRF), a Gas Power Station and a Composting Facility at the site. The landfill no longer accepts municipal waste and only one cell is currently open to accept residual waste from the Alternative Waste Treatment (AWT) facility as described below.

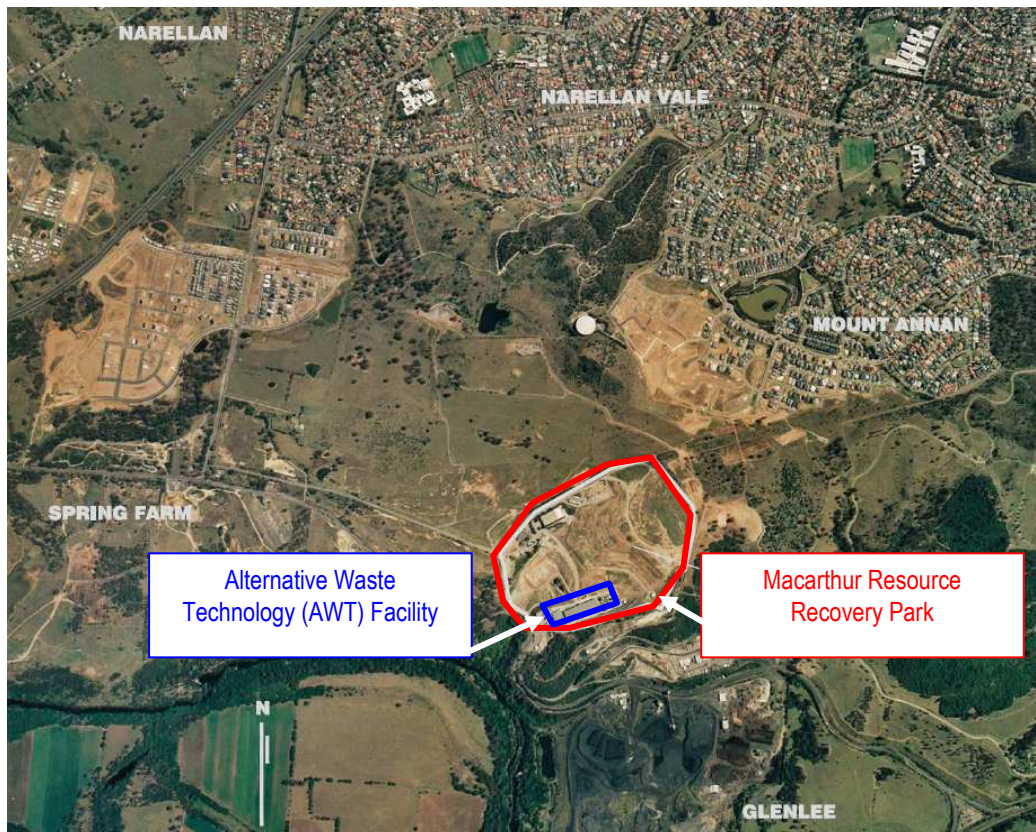


Figure 1: Site Location

On 7 September 2006, the then Minister for Planning granted approval for the construction and operation of an AWT facility at the MRRP (refer to Figure 2). The AWT facility is approved to process up to 120,000 tonnes of municipal waste (putrescible) each year. The facility also incorporates a Garden Organics Plant (GOP) that processes organic waste to produce compost.

Under the Minister's approval, the following tonnage can also be received and processed in the GOP:

- 25,000 tonnes per annum (tpa) of garden waste; and
- 5,000 tonnes per annum of biosolids (e.g. sewerage treatment plant residual).

In the 08/09 financial year, approximately 28,000 tonnes of garden waste and 0 tonnes of biosolids were received and processed at the GOP. This equated to 3,000 tonnes of garden waste in excess of the approved receipt and processing tonnage. WSN has sought to rectify the permitted tonnage through this modification application.



Figure 2: The Garden Organics Plant (GOP) within the AWT Facility at the Macarthur Resource Recovery Park

2. PROPOSED MODIFICATION

The GOP utilises tunnel composting technology to process organic material into high grade compost and mulch products. The tunnel composting system uses natural decomposition processes.

The existing approval for the AWT Facility restricts the amount of waste received and processed as follows:

Condition 2.8

Except as provided by a condition of an Environmental Protection Licence (EPL), the Proponent shall restrict the waste received at the site to the following:

- 130,000 tonnes per year of mixed municipal waste classified as inert or solid waste under Schedule 1 of the Protection of the Environment Operations Act 1997;*
- 25,000 tonnes per year of garden waste; and*
- 5,000 tonnes per year of biosolids.*

- 2.9 *Except as provided by a condition of an EPL, the Proponent shall ensure that the only wastes that are processed at the site are:*

- a) 90,000 tonnes per year of mixed municipal waste classified as inert or solid waste under Schedule 1 of the *Protection of the Environment Operations Act 1997* at the ArrowBio Plant;
- b) 25,000 tonnes per year of garden waste at the Garden Organics Plant; and
- c) 5,000 tonnes per year of biosolids at the Garden Organics Plant.

The above conditions restrict the total quantity of organics that may be received and processed annually at the facility to 30,000 tonnes (ie. 25,000 tonnes of garden waste and 5,000 tonnes of biosolids).

In September 2010, WSN submitted an application to modify the AWT Facility approval under Section 75W of the *Environmental Planning & Assessment Act 1979* (EP&A Act) to provide some flexibility in the type of waste received at the GOP. Specifically, if no biosolids were to be received at the facility in any one year, WSN seek to replace the biosolids quota with garden waste. This represents a potential 5,000 tpa increase in the amount of garden waste that could be received and processed at the GOP, however, the overall tonnage of organics received at the GOP would remain the same (30,000 tpa).

As described earlier, the GOP does not currently receive or process biosolids, but has received approximately 28,000 tonnes of garden waste in a year. Thus, modification of condition 2.8(c) and 2.9(c) to allow the GOP to receive / process 5,000 tonnes of garden waste or biosolids would provide WSN with the flexibility to meet current demands for garden waste processing without raising the overall total permissible quantity of material through the facility.

The proposed modified conditions of consent are as follows:

Condition 2.8

Except as provided by a condition of an Environmental Protection Licence (EPL), the Proponent shall restrict the waste received at the site to the following:

- a) 130,000 tonnes per year of mixed municipal waste classified as inert or solid waste under Schedule 1 of the *Protection of the Environment Operations Act 1997*;
- b) 25,000 tonnes per year of garden waste; and
- c) **An additional** 5,000 tonnes per year of **garden waste or** biosolids.

2.9 Except as provided by a condition of an EPL, the Proponent shall ensure that the only wastes that are processed at the site are:

- a) 90,000 tonnes per year of mixed municipal waste classified as inert or solid waste under Schedule 1 of the *Protection of the Environment Operations Act 1997* at the ArrowBio Plant;
- b) 25,000 tonnes per year of garden waste at the Garden Organics Plant; and
- c) **An additional** 5,000 tonnes per year of **garden waste or** biosolids at the Garden Organics Plant.

3. STATUTORY CONTEXT

The Minister for Planning was the consent authority for the original major project application, and is consequently the consent authority for this modification application under section 75W of the Act.

On 25 January 2010, the Minister delegated his powers and functions as an approval authority to modify certain modification requests under section 75W of the EP&A Act to the Executive Director, Major Projects Assessment. This modification application meets the terms of this delegation. Under these circumstances, the Executive Director may determine the application under delegated authority.

4. CONSULTATION

Under Section 75W of the EP&A Act, the Minister is not required to notify or exhibit the application. However, following a review of the modification application, the Department determined that the proposed modification should be referred to the Department of Environment, Climate Change and Water (DECCW), Camden City Council (Council), and the Roads and Traffic Authority (RTA). Consultation with other neighboring sites was considered unnecessary, as the environmental impacts of the proposal would essentially remain unchanged from the approved project.

The DECCW, RTA and Council raised no objections to the proposed modification. The DECCW advised that the receipt and processing of biosolids at the facility has a greater potential to be a source of odour as opposed to garden waste. Therefore, the DECCW supports the proposed modification as it has the potential to reduce odour emissions from the site.

Council raised concerns regarding odour emissions and recommended a condition of consent to address this issue.

5. ASSESSMENT

The Department has considered the following documents as part of the modification application (refer to Tag B):

- the Environmental Assessment;
- the original and consolidated consent;
- submissions;
- the Proponent's response to submissions; and
- the relevant provisions of the EP & A Act.

The Department considers the key issue to be the potential for generation of offensive odour. All other issues are considered to be minor and able to be addressed through the existing conditions of approval.

5.1 Odour

Odour is a key issue of concern to the community surrounding the MRRP and the AWT facility. In the early part of 2010, the site was generating multiple odour complaints and continues to do so periodically. Both the Department and DECCW have taken action to address this issue including the instigation of a 'Pollution Reduction Program' through the Environment Protection Licence governing the site.

WSN and DECCW continue to work closely with the community including initiating a community 'walk around' the facility to assist the community's understanding of the facility and potential odour sources.

In addition, WSN is currently finalising a comprehensive site wide odour audit at the MRRP to ensure that the facility is not generating offensive odour. Under the existing Environmental Planning Licence (EPL) for the site, WSN is bound to adhere to the recommendations of the Odour Audit to address local odour impacts.

Moreover, WSN has recently carried out extensive work to address potential odour impacts from the MRRP. In this suite of work, actions of direct relevance to potential odours generated by the Garden Organics Plant include installation of an 'odour control fence' to part of the perimeter of the site, including the boundary adjacent to the GOP. The 'odour fence' is designed to supplement the odour controls on site including an existing biofilter system currently operating within the GOP.

No additional odour modelling was undertaken to quantitatively determine the potential impacts associated with the proposed modification. However, the DECCW confirmed that the receipt and processing of the approved quantity of biosolids at the facility has the greater potential to be a source of odour from the site as opposed to the same quantity of garden waste. Biosolids (eg. sewerage treatment plant residuals) are typically a more odourous waste type. Given that the proposed modification could potentially result in a reduction of the amount of biosolids processed at the site through the substitution of biosolid quantities by green waste, the proposed modification is more likely to result in less odour being generated from the site.

On the basis that the proposed modification would not alter the overall quantity of throughputs or intensity of the existing operation at the GOP, and in light of the original and recently installed odour suppression devices operating in and around the GOP, the Department considers that the proposed modification would have no additional impact with regard to odour production. Added assurance of future compliance is provided by the EPL requirement to undertake and abide by the recommendations of a comprehensive site wide odour audit.

Both the Department and the DECCW consider that the air quality management and monitoring requirements contained within the existing approval and EPL for the operations are sufficient to address potential odour impacts. Notwithstanding, to ensure that the volume of garden organics being processed, and the retention time of waste within the enclosed tunnels does not lead to the release of odours the following condition is proposed:

- the Proponent shall develop a Standard Operating Procedure (SOP) to control fugitive emissions from the operations of the Organics Processing Plant. The SOP shall be, as far as possible, consistent with the existing Environmental Management Plan, developed in consultation with Council and submitted to Director-General for approval within 3 months of approval of Modification 4.

It is WSN's responsibility to consult with the DECCW with regard to updating the existing EPL for the AWT facility to incorporate the modified limits on waste receipt and processing.

5.2 Other Issues

Table 2: Other Issues

Issue	Consideration	Recommendation
Traffic	Whilst WSN propose to increase the quantity of garden waste that can be processed at the GOP, the overall total permissible quantity of material through the facility would not increase. Therefore there would be no additional truck movements or traffic impacts.	No additional conditions required
Noise	Truck movements and the intensity or duration of the operation would not be changed as a result of the proposed modification. Accordingly, the modification would result in no additional noise impacts.	No additional conditions required
Dust	The GOP would remain as a contained operation with all unloading, loading and processing occurring within purpose built enclosed structures. Dust emissions would not change as a result of the proposal and impacts would remain acceptable.	No additional conditions required
Water	The EA concluded that the AWT and GOP would not have a negative impact on water and groundwater. The process remains unchanged as a result of the proposed modification and impacts on water and groundwater would also not change.	No additional conditions required

6. CONCLUSION

Given that the proposed modification would not result in an increase to the quantities of waste approved for receipt and processing at the facility, the Department considers the proposed modification would not increase the environmental impacts of the facility. The Department considers there are potential environmental benefits associated with the proposal such as a reduction in potential odour impacts from the site.

Consequently, the Department believes the proposed modification should be approved.

7. RECOMMENDATION

Under delegation of the Minister, it is RECOMMENDED that the Executive Director, Major Projects Assessment;

- consider the findings and recommendations of this report;
- approve the proposed modification under Section 75W of the EP&A Act;
- sign the attached instrument **Tagged A**.

Christine Chapman
Major Projects Assessment


Chris Ritchie 7/12/10
Manager - Industry
Major Projects Assessment


Chris Wilson 12.12.10
Executive Director
Major Projects Assessment