Our reference:

Department of Planning and Infrastructure
Development Assessment Systems & Approvals
GPO Box 39
Sydney NSW 2001

Attention: David Mooney

ELECTRONIC AND STANDARD MAIL

Dear Sir,

Spring Farm Resource Recovery Facility (05_0098 MOD 5)
Section 96(1A) of the Environmental Planning and Assessment Act 1979

I refer to the Department of Planning and Infrastructure correspondence received by the Environment Protection Authority ("EPA") on 11 November 2013 regarding an application from SITA Australia Pty Ltd (SITA) to modify the Project Approval for the Spring Farm Resource Recovery Facility, Richardson Road, Spring Farm ("the Premises"). SITA holds Environment Protection Licence No. 12588 (the "Licence") in respect of the Premises. The EPA also refers to its correspondence dated 4 October 2012 providing comments on the first draft of the proposal.

The modification application has been sought to allow for a number of changes, including:

- Increase processing capacity of general solid waste (non-putrescible) by 40 000 tpa
- Receive and process 520m^3 per day of liquid waste

The EPA has reviewed the Environment Assessment dated 30 October 2013 prepared by Cardno NSW/ACT and provides the following advice/comments:

1. The use of incorrect waste classifications and definitions in the Environment Assessment makes the proposal difficult to assess:
    - References to 'inert' waste in the document are incorrect. All waste should be classified in accordance with EPA Waste Classification Guidelines;
    - When referring to 'solid waste' it is unclear if the writer is referring to general solid waste (non-putrescible) or general solid waste (putrescible).
    - The use of the term 'biosolids' is used incorrectly used to refer to the by-products generated from the waste water treatment process. In accordance with Schedule 1 of the *Protection of the Environment Operations Act 1997*, biosolids are defined as the organic product that results from sewage treatment processes (sometimes referred to as sewage sludge)."

2. The residue or by-products generated from the leachate stream of the treatment processes and the liquid from the sludge dewatering must be classified in accordance with the EPA Waste Classification Guidelines and disposed of to a facility that can lawfully accept that waste type. This stream must be kept separate from the organic stream.

PO Box A290 Sydney South NSW 1232
59-61 Goulburn St Sydney NSW 2000
Tel: (02) 9995 5000 Fax: (02) 9995 5999
TTY (02) 9211 4723
ABN 43 692 285 758
www.epa.nsw.gov.au

3. The residue or by-products generated from the organic stream of the treatment processes must be classified in accordance with the EPA Waste Classification Guidelines and disposed of to a facility that can lawfully accept that waste type. Alternatively to use the by-product and the liquid from the sludge dewatering of the organic stream in the composting process a specific exemption may be sought from the EPA.

4. No assessment of potential impacts from the flare including visual impacts is included in the Environment Assessment.

5. EPA recommends the requirement for a meteorological station at the Premises to regularly record wind speed, wind direction and temperature (at a minimum).

6. A detailed input/output balance for the site to determine the processing capacity and to manage storage requirements for the proposal has not been undertaken. In addition volumes of outgoing waste have not been provided in the Environment Assessment.

7. Management of tank de-sludging has not been included in the Environment Assessment.

8. EPA review of the odour modelling indicates that the assessment is inadequate and EPA recommends the assessment should be revised to demonstrate impacts have been robustly and realistically assessed (see attachment A)

If have any questions regarding this matter please contact Christy Groves on (02) 9995 5765.

Yours sincerely

KEVIN HISER
A/Unit Head - Waste Compliance
Environment Protection Authority

4/12/13

Attachment A

The EPA advises that further information and clarification is required to demonstrate the assessment of Project impacts has been robustly and realistically assessed.

A summary of the main issues is provided below.

1) Modelling results show compliance with the adopted Project odour criterion however there appears to be a discrepancy between model results and actual odour impacts

Despite the history of ongoing odour complaints in the area surrounding the Project site, the Project dispersion model predicts compliance with the Project odour criteria of 2 OU and consequently minimal risk of adverse odour impacts at existing or proposed future residential receptors.

Consequently the dispersion model results do not appear to be representative of existing odour impacts at residential receptors in the vicinity of the Project. This indicates the modelling assessment does not adequately estimate the risk of adverse odour impacts.

2) A range of factors require consideration to ensure modelled odour impacts are reliable

The failure of a dispersion model to adequately predict odour impacts can be attributed to a range of factors. In the context of the observed discrepancy, further consideration of the following issues may increase the robustness of the model performance:

- identification of all significant ongoing and intermittent emission sources;
- operating scenario representativeness, including scenarios that take into account potential upset conditions;
- quantification of odour emissions data, including emission data representativeness and range;
- existing mitigation methods and management strategies and their implementation and efficacy;
- cumulative odour impacts.

3) The Project has the potential to increase the risk of odour impacts at nearby residential receptors

The Project includes receipt and treatment of new waste types, and a significant increase the amount of waste received and processed. These changes will result in alteration to the number, size and nature of some existing emission sources, in addition to new emission sources. Changes associated with the Project with the potential to affect odour emissions include:

- increased deliveries and amount of time the ARRT receival hall is open;
- changes to tank farm operation including use of open and additional tanks and reactors;
- de-sludging of tanks;
- changes to existing waste streams and processing of new waste types. In addition, the Project appears to include the resumption of putrescible waste acceptance and processing (see EA, Section 6.2.3).