

19 May 2015

Jane Flanagan
Senior Planner
Industry Assessments
Department of planning and Environment
23-33 bridge Street
SYDNEY NSW 2000

Dear Jane,

06-0239 Genesis Waste Facility - Mod 5 Pre-sort enclosure: Response to Submissions

In response to your email dated 28 April 2015 regarding submissions to 06-0239 Mod 5, I would like to provide you with the following information.

Response to Department of Planning and Environment submission

We note the Department of Planning and Environment (DP&E) have requested a Spoil Management Plan, with particular concern relating to the management of dust emissions from the Pre-Sort Enclosure (PSE).

AT&L have provided the below responses to this request. A copy of the email correspondence has been provided at **Attachment A**.

With regards to length of time spoil will be stored on site:

The reuse of topsoil and spoil immediately after excavation where possible, otherwise temporarily stockpile area will be provide within the site boundary.

With regards to noise impacts associated with spoil management:

Any excessive noise associated with construction during earthworks will be managed by earthen or structural noise wall, if required.

With regards to the final location for spoil:

The spoil will gradually be used for fill around the work areas within the site boundary. A relocation for the spoil will be continuous exercise, the extent of this exercise is undetermined at this stage of works.

It is also expected that much of the spoil will be able to be screened in situ whereupon, provided that it satisfies the relevant EPA Exemptions, it may be sold as product soil. The spoil which is not sold in this way will be subject to the above management.

With regards to potential dust impacts:

The installation of temporary erosion and sedimentation controls will be implemented around temporary stockpiles. Revegetation of temporary stockpiles, geofabric covers or dust sealants may be used for dust management.

With regards to the preparation of a spoil excavation and management plan as a condition of any approval to the modification:

Preparing a spoil management plan for earthworks of this size seems unwarranted. As the spoil will be [either removed from site or] continuously be used for fill with the surrounding works.

Response to Blacktown Council submission

This response is limited to matters not dealt with in letter from Christopher Biggs of DADI to Council dated 1 May 2015 directed to Glennys James. This letter has been provided at **Attachment B**.

Planning

As indicated in the 75W report, an increase in tonnage of processing materials beyond the current project Approval (as modified) limits has not been proposed as part of the Modification.

The Modification seeks to improve the efficiency of existing material pre-sorting procedures by providing additional floor space for mechanical and hand sorting. This improvement will not result in additional traffic impacts off-site above that stated as it does not attract additional material to the site. There will be no impacts on the existing driveway.

Traffix has prepared a letter relating to the traffic impacts of the modification (**Attachment C**). The letter concludes:

“... the proposal will generate up to 10 veh/hr which is a minor increase and will have minimal impact on the surrounding road network. As such, the proposal is supportable from a traffic perspective.

An additional 10 on-site car parking spaces are also proposed which will readily accommodate any increase in parking demands arising from the additional staff required to operate the new enclosure”.

With 10 additional staff expected to be employed as a result of the PSE, 10 additional car parking spaces have been provided on the site (indicated on layout plan at **Attachment D**).

A ‘Turn Path’ diagram has been prepared by AT&L and is provided at **Attachment E**. The plan demonstrates how all trucks and vehicles can enter and exit the building in a forward direction.

Axis Architects have provided the following commentary on the consistency of the proposed enclosure with the height, bulk, scale, colours and finishes of the existing Materials Processing Centre building.

“... we advise that the proposed Pre Sort Building will be of similar bulk and scale of the adjoining MPC centre currently operating on the site. Construction materials and finishes will be [consistent] with this existing adjoining facility.”

This statement is provided in the Architectural Design Statement at **Attachment D**.

Building

Axis architects have advised it is appropriate to resolve the details of fire safety provisions at detailed design stage. The PSE provides full external access for firefighting appliances to travel in a continuous forward direction around the proposed facility.

It is understood the certifying authority should forward the application for construction certificate to the NSW Fire Commissioner.

Engineering

AT&L Engineers have confirmed the engineering design is as per 'The Engineering Guide for Development 2005'. See Engineers Design Statement at **Attachment F**.

Environmental Health

Pacific Environment has conducted further noise modelling to respond to Blacktown Council's concerns regarding cumulative noise impacts of the additional operating space. Results of this analysis will be issued to Jane Flannagan and at a later date due to the time required to carry out this modelling. Expected finalisation date is 22 May 2015.

Response to DPI (Office of Water) submission

Groundwater

It is confirmed excavation will be required as part of the Modification. The proposed excavation, some 14m deep into a berm of overburden approximately 14 metres high has the potential to intercept groundwater flow. Excavation will not however be to a greater depth than the ground level of the already existing buildings. In terms of groundwater seepage into excavations, inflow rates are expected to be low and will, in all likelihood, reduce further within a few days of the water-bearing strata being exposed. The volume of water generated by groundwater inflow is expected to be considerably less than that due to rainfall and it is considered unlikely that a formal groundwater dewatering system will be required.

A licence for temporary construction dewatering issued by the NSW Office of Water (NOW) is unlikely to be required as the total groundwater inflow is expected to be less than 3 ML/yr.

It is expected that seepage water will be suitable for transfer to the construction-phase stormwater management systems. Poor quality groundwater may be encountered in some areas, such as elevated salinity associated with saline soils or highly alkaline water perhaps with elevated ammonia levels associated with the volcanic breccia present beneath the hill in the northern part of the site. On-site treatment, blending with stormwater or transfer off-site to a suitable, licensed disposal site may be necessary as a last resort.

This information has been taken from the Soil and Water Report prepared by Edison Environmental & Engineering Pty Ltd in April 2015 in support of SSD 6236 which is based on groundwater testing across the entire site.

Water supply

Roof run-off capture for reuse will be provided, consistent with Storm Consulting's Site Surface Water Management Plan provided at Appendix A of **Attachment G** (AT&L Stormwater Management Report).

It is confirmed the southern OSD basin will be used as a water supply source for the Pre-Sort Enclosure.

Response to EPA submission

Dust management

As detailed in the original Environmental Assessment Report for the application prepared by Environmental Resource Management Australia, enclosed processing of construction and demolition materials is favourable over open air sorting as it minimises air quality impacts.

The Air Quality Report prepared by Holmes Air Sciences (submitted with the original application) identified road haulage to landfill on unsealed roads as the most significant dust generating activity. The proposal will not contribute to a greater degree if haulage to the landfill. The construction and operation of the downhill conveyor and chute has reduced the number of trucks travelling on unsealed roads within the Quarry and has thereby minimised the risk of airborne particulates from this activity.

Section 9.5 of the original Environmental Assessment Report details the management and mitigation measures for air quality for both construction and operation. These include waster spray mists, wetting of vehicles with potentially dusty roads, and planting on berms.

The waste proposed for pre-sorting within the PSE are materials within the existing waste stream received at the facility and currently dealt with within the MPC. These are typically commercial and industrial wastes such as fabrics, plastics, paper cardboard, glass, metals and timber.

These 'soft' materials are not inherently dusty and will not be subject to processes liable to make them dusty. Cardboard, paper and plastics will be baled within the PSE for off-site recycling.

In terms of the operation of plant machinery and waste transfer and sorting, the existing operations at the main MPC will extended to the PSE. Existing dust measures management measures will continue.

Current dust and air quality monitoring measures are ongoing. Since commencement of operations no exceedances of the permitted levels of airborne particulates has been identified.

Details of the existing Air Quality Odour and GHG Management Plan are provided at **Attachment H**. Details of management methods for both construction and operation phases are provided.

Waste management

The existing waste management, sorting and storage procedures approved under 06-0239 (as modified) are proposed to extend to the PSE.

Onsite traffic management will be as currently advised to the EPA as per the Traffic and transport Code of Conduct (**Attachment I**).

Trucks delivering materials approach the site via Honeycomb Drive in a westerly direction along 'DADI Drive'.

All trucks are weighed at the inbound weighbridge. At this point their loads are inspected and a preliminary classification takes place.

Loads identified as having a larger proportion of 'soft' commercial and industrial materials will be directed to the PSE. The flow of traffic is shown on the diagram provided in **Attachment J**.

All vehicles drive in a forward direction into the PSE, turn within the building empty their load and exit in a forward direction as shown on the diagram. All trucks then follow the route through the site returning to the weighbridge to be weighed on their exit.

Baled or packaged materials for recycling by others will exit in the same manner and be weighed as they leave the site.

Residual materials from the sorting process will be delivered by truck from the PSE to the MPC. The waste will be subjected to existing MPC processes.

No new additional type of waste will be received at the premises.

The existence of the PSE provides an extension of the existing activities at the MPC. In the case of mechanical or plant failure in the MPC, the PSE will act as contingency centre to absorb the impacts of the failure, ensuring key activities continue on site. Should there be a failure in the PSE, activities will resume as they currently run. No contingency plan will be necessary.

Surface water management

As detailed in Storm Consulting's Site Surface Water Management Plan provided at Appendix A of **Attachment G**, work floor waste stockpile area is to be directed to sewer. All clean surface runoff is to be diverted to two OSD basins or an in-pit basin. No waste water will be created as no toilets are proposed in the PSE.

Response to NSW Fire and Rescue submission

We are yet to receive comments from these authorities.

Should any further clarification be required by DP&E or the authorities, please let me know.

Kind regards,



Skye Playfair Redman
Consultant

Attachment A: Email from AT&L regarding DP&E request for Spoil Management Plan

Attachment B: Letter to Blacktown Council from Christopher Biggs, DADI

Attachment C: Letter from Traffix regarding impacts of proposed modification

Attachment D: Architectural floor plan and Design Statement

Attachment E: Turn Path diagram

Attachment F: Engineers Design Statement

Attachment G: Stormwater Management Report

Attachment H: Air Quality Odour and GHG Management Plan

Attachment I: Traffic and Transport Code of Conduct

Attachment J: Traffic flow diagrams

Attachment A

Email from AT&L regarding DP&E request for Spoil Management Plan

Attachment B

Letter to Blacktown Council from Christopher Biggs, DADI

Attachment C

Letter from Traffix regarding impacts of proposed modification

Attachment D

Architectural floor plan and Design Statement

Attachment E
Turn Path diagram

Attachment F
Engineers Design Statement

Attachment G

Stormwater Management Report

Attachment H

Air Quality Odour and GHG Management Plan

Attachment I

Traffic and Transport Code of Conduct

Attachment J
Traffic flow diagrams