GENESIS XERO WASTE

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1 March 2017

By email: emma.barnet@planning.nsw.gov.au

Ms Emma Barnet
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Barnet,

Genesis Xero Waste Facility –Proposed Modification to Project Approval 06_0139 (MOD 6)

Reference is made to Major Project Approval 06_139 that permits the operation of a materials recovery facility and landfill at Eastern Creek.

On September 20 2016, the Department of Planning and Environment (DPE) issued Secretary's Environmental Assessment Requirements (SEARs) in response to a proposed modification (modification 6) of MP06_139 to permit an extension to operating hours at the site.

Shortly thereafter, Dial-a-Dump Industries (DADI) submitted a further and separate request for SEARs for a proposed modification to the cap on waste volumes permitted to go to landfill in a single year. This was referred to as modification 7. In response to this request the DPE sought additional information.

In reviewing the DPE's request for additional information in response to modification 7, DADI recognised the similarities in the scope of issues that were likely to be raised and discussed with you the opportunity of combining the two (2) modifications. This correspondence seeks to formalise these discussions and seeks to amend the SEARs issued on 20 September 2016 to include the following:

- The extension to operating hours (subject of the existing SEARs issued on 20 September); **and**
- **Improved flexibility in relation to the waste volume permitted to be landfilled, by removing the annual cap limit of 700,000 tonnes.**

The intent of the modifications is to improve operational flexibility of the Genesis facility in response to market demand for waste management services. As the DPE are likely aware, there is an ongoing and increasing number of major infrastructure projects being undertaken across Sydney. Many of the major infrastructure projects, currently underway have consent to undertake night time works and require access to waste disposal services during these hours.

For the most part, operations at Genesis will continue to be undertaken in accordance with MP 06_139 (as amended). In particular, there is to be no modification to the following:

- The maximum or total volume of waste that may be accepted in a single year (i.e. they will not receive more than 2 million tonnes in a year); and
- The frequency of reporting of waste received and processed at the facility.

The following correspondence sets out the relevant existing project details, proposed changes and identifies the areas for further environmental investigation to support the implementation of the development and mitigate potential impacts.

To address the proposed amendment of the SEARs to include matters arising from the proposal to remove the landfill cap, the following additional sections have been included:

- Section 3: sets out the existing conditions of consent that are the subject of the review. Sub-sections 3.1.2 and 3.2.2 specifically address the proposed modification of condition 1 (a) in schedule 3 that controls landfill capacity;

- Section 4.0 sets out the need and justification for the proposed modification. Sub-section 4.2 specifically addresses the focus of the amendment relating to removing the landfill cap imposed by condition 1(a) of schedule 3.

Consistent with previous advice and requests received from the DPE, the request to amend the SEARS has sought to provide a holistic approach to the proposed modification, presenting both the initial request to extend hours combined with the amendment to remove the landfill cap.

1 Background to the Project

This chapter provides a brief introduction to the current Project and details the current activities as carried out by the Proponent.

1.1 Overview

MP06_139 permits the operation of a Resource Recovery facility (**RRF**) and a general solid waste (non-putrescible) landfill. The RRF includes a Materials Processing Centre (**MPC**) and a Waste Transfer Station. The Project is commonly known and referred to as the 'Genesis Xero Waste Facility' or 'Genesis'.

The following activities have been approved under Part 3A of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**):

- capacity to receive up to two (2) million tonnes of waste per annum, including inert and solid wastes from construction and demolition (C&D), commercial and industrial (C&I) waste streams complying with acceptable waste for general solid waste (non-putrescible) facilities and green waste clean ups;
- use of fixed and mobile plant on-site to undertake waste processing including sorting, screening, sieving, crushing, grinding, shredding and/or chipping, and composting of green waste using mobile plant;
  recycling of an estimated 65-80% of incoming waste (1.3 to 1.6 million tonnes per annum (mtpa), based on maximum capacity intake) e.g. to produce road base, aggregate, landscaping soil, bedding sand, mulch, wood chip, green waste compost and asphalt derived products for land application;
- testing and on-site storage/stockpiling of finished products prior to resale from stockpiles, predominantly to the building, construction and landscaping sectors and potentially the domestic market;
- transport of an estimated 20-35% of incoming waste (0.4 to 0.7 mtpa, based on a maximum capacity intake) to the landfill proposed within the quarry void, comprising incoming materials which are unsuitable or uneconomical for recovery and recycling (for example contaminated soils, asbestos waste and loads that cannot physically be sorted);
- quarantine and transfer of unacceptable wastes to an appropriate off-site facility for disposal; and
- construction and operation of associated infrastructure, plant and equipment, including upgrade of the internal road network and reshaping of earthen amenity berms.

1.2 The Proponent

The landowner, ThaQuarry Pty Ltd and ACN 114 843 453 Pty Ltd own Lot 1 in DP 1145808 and Pt 8 in DP 1200048 being the subject land of the project.

1.3 The Site

The site, which includes the surface area of the quarry is 52.4Ha and comprises of two (2) land parcels, identified as own Lot 1 in DP 1145808 and Pt 8 in DP 1200048 located within the Blacktown Local Government Area.

The general layout of the approved site is shown in **Attachment A.** An aerial view of the existing site layout, depicting key operational areas is shown in Figure 1.

FIGURE 1 – Depicts the existing site layout and operational areas including Segregated Materials Area (SMA), Materials Processing Centre (MPC) and Landfill.

1.4 Current Operations

The Genesis facility specialises in the management of construction and demolition waste materials. Management operations fall within two (2) distinct categories:

- resource recovery – through the materials processing centre; and
- landfilling – residual materials from the MPC or other EPA authorized Materials Recovery Facilities (MRF)

The site is operated in accordance with approved environmental management strategies and strict waste classification management standards implemented through a rigorous screening processes involving visual inspection of loads by weighbridge camera and then spotters at various positions throughout the facility.

Materials processed for recovery through the MPC are also tipped on the floor of the MPC building prior to being fed into the fixed plant for sorting.

1.4.1 Classification of Waste Materials

The Genesis facility has licences to accept up to two (2) million tonnes of waste per annum. Waste loads received at the facility are classified into three (3) categories outlined in Table 1 below.

Table 1: Categories of waste accepted by Genesis, Eastern Creek

Categories	
Segregated hard-fill materials	this is material capable of being recovered or recycled by a series of processes. Carried on externally to the MPC, in what is known as the Segregated Materials Area (SMA). After reprocessing and/or recovery, recycled hard-fill materials [brick concrete, sand soil stone bitumen] are stored on-site within the SMA until sold.
Co-mingled construction and demolition waste and commercial and industrial waste	consisting of metals, brick, concrete, plasterboard, soil, aggregates, plastics and a range of building and demolition wastes. These materials are delivered to the Materials Processing Centre [MPC] for classification and processing.
Land-filling	the remainder of incoming waste materials is directed straight to landfill for disposal. This is due to its chemical composition and waste classification which requires that it be disposed of by landfilling.

1.4.2 Waste Processing: MPC and PSE Plant

The recycling / waste transfer facility opened 8 June 2012 and operates pursuant to EPL 20121. Modification 5 approved the establishment of second sorting and processing area to the southwest of the MPC, this enclosure is referred to as the Pre-Sort Enclosure and is intended to processes Commercial and Industrial waste streams.

Mixed or comingled building and demolition waste is transported by truck to the facility where it is unloaded within the MPC or PSE. The existing MPC is a large building of cast concrete slab, steel and color-bond construction typical of the surrounding industrial buildings within the Precinct.

Waste which is received within the Materials Processing Centre (MPC) or Pre-Sort Enclosure (PSE) is subject to processing by the Fixed Plant contained inside a building.

The Plant, shown in Figure 3, is a large and complex piece of fixed machinery involving up to 52 interconnected electrically driven conveyors and a range of magnets, graders, screens sieves and hand sorting stations.

FIGURE 2 (Front of MPC building, front main doors visible)

The Plant operates throughout the working day and inevitably there are breakdowns and periods in which routine maintenance is required. Whilst sections of the Plant are isolated from operation for safety purposes during routine maintenance, the times taken for this have a consequential effect on the overall productivity of the Plant.

FIGURE 3: Photo of inside the MPC from the southern end

The extension of hours is partly sought to accommodate the maintenance, repair and cleaning schedules which are necessary to ensure that the Plant operates to maximum capacity and in an environment conducive to workplace safety.

The Pre-Sort Enclosure approved under Modification 5 (as set out in section1.4) will replicate the MPC process in a new enclosure to be constructed to the southwest (refer to approved site layout provided at **Attachment A**).

1.4.3 Segregated Materials Area

The segregated materials area (SMA) is principally used for the receipt, dispatch and stockpiling of inert construction and demolition materials, such as sand dirt concrete, brick tiles, asphalt. Materials received within the SMA come from both pre-sorted loads, transferred from the MPC and also from direct loads of material deposited directly within the area. Once delivered to the SMA materials are sorted into relevant categories (ie brick concrete, sand, soil, stone and bitumen) for reprocessing into a variety of products for sale.

From these primary materials delivered direct to the SMA or sorted at the MPC, all different kinds of aggregates and road base can be produced. A list of typical products produced and subsequently stored on site is provided in Table 2 and shown in Figures 4 and 5.

FIGURE 4: Stockpiles of finished products within the SMA

FIGURE 5: Stockpiles of finished products within the SMA

Table 2: Materials produced on site and stored in the SMA

Product	Product Description
	**10mm Aggregate** A versatile, double screened recycled brick aggregate with multiple applications. Ideal for use around pipes, wet areas and decorative pathways.
	**20mm Aggregate** Double screened recycled aggregate sourced from concrete, asphalt and construction rubble. Perfect for drainage material, retaining wall backfill and decorative pathways.
	**40/70 Aggregate** Crushed recycled concrete between 40mm - 70mm. This larger-sized product is ideal for temporary site access roads (to minimise clay carryout by vehicles) and retaining wall backfill.
	**Bedding Sand** Suitable for pipe bedding, trench filling, slab levelling and sub-course for paving. A low-plasticity, economical and environmentally friendly alternative to virgin sands.

All products produced on site are routinely tested by independent third parties to ensure compliance with any relevant resource recovery exemptions and to ensure consistent quality products are produced.

All stockpiles heights are limited to within the height of the Amenity Berms as required by the project approval and are maintained in accordance with all current legislative and regulatory requirements.

The product is produced by a variety of machinery that is currently used as required within the area and generally consists of 2 mobile crushers plus auxiliary equipment (such as screens, stock-pilers and re-claimers). Mobile equipment (such as loaders and excavators) used to relocate materials and product are also used within the area on an "as required" basis.

1.4.4 Landfill

Any waste which cannot be recycled or re-processed through the MPC, PSE or the SMA, is sent to the Landfill Area. The landfill receives waste directly from the MPC, via the yellow chute depicted in Figure 6. Alternatively, waste may also be accepted directly from waste loads which have been classified as General Solid Waste (Non-putrescible) as shown Figure 7.

Under normal conditions, on an average operating day there are two (2) compactors, two (2) loaders and one (1) excavator operating in the landfill (while the chute is also still operating).

The landfill is located east of the existing MPC and approved PSE (refer to **Attachment A**). Under the existing EPL the landfill is permitted to receive 700,000 tonnes of waste per annum under the existing conditions of consent.

FIGURE 6 – Landfill Operations – chute waste from Genesis MPC

FIGURE 7- Landfill Operations – directed via vehicle from authorized facilities

1.5 Consent history

The Genesis Facility was first approved in November 2009 and is referred to as MP06_139. Since this time the Major Project Approval has been modified five (5) times. A summary of the primary consent and the subsequent modifications are set out below.

- Original Project Approval – Minister's Approval (06_0139) for construction and operation of a resource recovery and non-putrescible landfill facility, with the following input and storage capacities:
    - a waste recovery facility including a MPC and greenwaste area (not yet operating greenwaste activities);
    - rehabilitation of the quarry void via a Class 2 (non-putrescible) landfill;
    - a total throughput of up to 2 million tonnes of materials at the site per calendar year;
    - landfilling of up to 700,000 tonnes of non-putrescible waste (including asbestos);
    - stockpiling of up to 50 tonnes of tyres on site at any one time; and
    - stockpiling of up to 20,000 tonnes of greenwaste on site at any one time.

Modification (Mod 1 granted by the Minister on 30 September 2010) for the following components:

- Electrically powered conveyor and chute;
- Postponed commencement of construction;
- Two way traffic on Fourth Avenue;
- Concrete bay walls within the greenwaste processing area; and
- Relocation of the wheelwash.

- Modification (Mod 2 granted by the Minister on 9 November 2010) for correction to the land description details of the project Approval. The corrected reference to the land being Lots 1,

2, 3 and 4 in DP 1145808.

- Modification (Mod 3 granted by the Minister on 5 December 2011) for the following components:
  - Revised final landform level of the fill pad at Area D;
  - Operational landform levels and site stormwater design;
  - Internal office and external amenities to the Weighbridge;
  - New amenities building;
  - New amenities building associated with the spotter stations;
  - New administrative/office building;
  - New amenities at the tarp stand area;
  - Approval for the use and relocation of the vehicle turning bay which works have already been carried out; and
  - Voluntary planning agreement.

- Modification (Mod 4 granted by the Minister on 14 December 2013) for the following components:

  - Extended operating hours for the MPC allowing it be operated during the hours of 6am to 10pm Monday to Friday, and 6am to 4pm Weekends and Public Holidays; and
  - Modifications to the noise levels in Table 4, which provided that the Proponent would not exceed 36 LAeq(15 minute) dB(A) during the day and 35 LAeq(15 minute) dB(A) during the evening and Morning Shoulder.

- Modification (Mod 5 granted by the Minister on 17 March 2016 for the following components:
  - Allow construction of a Pre-Sort Enclosure in accordance with the plans submitted with the modification application.

1.6 Environmental Protection Licences

The Genesis Facility operates with two (2) Environmental Protection Licences (EPL) issued by the NSW Environmental Protection Authority (EPA). These include:

- EPL No. 20121, relates to the Recycling and resource recovery arm of the operation; and
- EPL No. 13426 relates to the management and regulation of the general solid waste (non-putrescible) landfill operation.

The relevant controls of each licence are set out below.

1.6.1 EPL: 20121: Recycling and Resource Recovery

EPL 20121 applies to the resource recovery processes carried out on the site and allows for the storage of up 667,000 tonnes of waste at any one time. Of this the following fractions of waste may be stored:

- A maximum of 20,000 tonnes of garden waste
- 50 tonnes of tyres; and

- Individual wood waste stockpiles (both processed and unprocessed) must not exceed 2,000 tonnes each (notably there is no overall limit or a limit of the number of stockpiles).

1.6.2 EPL: 13426: Landfill and Waste Storage

Under the provisions of EPL 13426, a total of 700,000 tonnes of waste may be directed to landfill in a calendar year.

2.0 Planning Framework

This section sets out the planning and legislative framework under which the application is made.

The Project was declared a Major Project to which (the former) Part 3A of the EP&A Act applies and for which approval of the Minister for Planning was required.
Ministerial Project Approval (06_0139) was granted on 22 November 2009.

Following the repeal of Part 3A of the Act on 1 October 2011, the project continues to be subject to Part 3A of the Act pursuant to the transitional provisions provided in Schedule 6A of the Act as follows:

> ***Transitional arrangements — repeal of Part 3A***
>
> *1) The following are, subject to this Schedule, transitional Part 3A projects:*
>
> *(a) an approved project (whether approved before or after the repeal of Part 3A),*
>
> *(b) a project that is the subject of an approved concept plan (whether approved before or after the repeal of Part 3A),*
>
> *(c) a project for which environmental assessment requirements for approval to carry out the project, or for approval of a concept plan for the project, were last notified or adopted within 2 years before the relevant Part 3A repeal date (unless the environmental assessment is not duly submitted on or before 30 November 2012 or on or before such later day as the Director-General may allow by notice in writing to the proponent),*
>
> *(d) a project for which an environmental assessment (whether for approval to carry out the project or for approval of a concept plan for the project) was duly submitted before the relevant Part 3A repeal date.*

As the project is the subject of an approved project, Part 3A of the Act continues to apply. Accordingly, the proposed modification can be considered under Section 75W of the Act.

3.0 The Proposal and Amendment to Proposed Modification 6

The following section identifies the existing consent conditions and proposed modifications to these conditions that would facilitate the implementation of the proponent's proposal.

As set out in section 1 the proposed modification will involve amendment of the conditions of consent relating to hours of operation and landfill capacity. The intent of the modification is to improve the operation of the site and respond to demand for services aimed at meeting current infrastructure development needs.

3.1 Existing Conditions

The following section sets out the existing operational requirements of Genesis that are the subject of the proposed modification.

3.1.1 Hours of Operation

The following conditions of consent are relevant to the proposed modification:

- Conditions 39, Table 5, General hours of operation (including construction hours);
- Condition 39a, sets out the hours of operation applying to the chute that feeds waste from the MPC to the landfill;
- Condition 39b, sets out that deliveries are limited to the "operational hours" set out in Table 5 of condition 39;
- Condition 39c, provides extended hours of operation for the MPC permitting operations from 6am to pm Monday to Friday and 6am to 4pm Weekends and Public Holidays.

A summary of the conditions is set out in Table 3 below.

Table 3: Summary of hours approved under Condition 39, Table 5 MP06-139

Activity	Day	Time
Construction	Monday – Friday	7:00am to 6:00pm
	Saturday	8:00am to 4:00pm
	Sunday and Public Holidays	Nil
Operations (including waste deliveries and chute use)	Monday – Friday	7:00am to 6:00pm
	Saturday, Sunday and Public Holidays	8:00am to 4:00pm
MPC	Monday – Friday	6:00am to 10:00pm
	Saturday, Sunday and Public Holidays	6:00am to 4:00pm

3.1.2 Waste – Limits on Input

Condition 1 states the following:

The proponent shall not:

(a) Landfill more than 700,000 tonnes of non-putrescible waste per calendar year;
(b) Receive or landfill putrescible waste on site;
(c) Stockpile more than 50 tonnes of tyres on site at any one time;
(d) Stockpile more than 20,000 tonnes of greenwaste on site at any one time;
(e) Receive waste on site hat is contaminated by chemicals and/or pathogens that will not be rendered harmless by the process or that may constitute a health or environmental risk, including clinical and related waste and diseased carcasses; and
(f) Receive waste on site containing contaminants classified as hazardous waste, restricted waste (other than asbestos) or liquid waste under the POEO Act.

3.2 The Proposed Modification Amended Modification 6:

The following section sets out the proposed amendments and provides a discussion on the need and justification for the extended hours and improved flexibility in relation to waste management and disposal on site. The amending information is identified by use of **bold underlined text or strike through, as relevant.**

3.2.1 Proposed Hours of Operation

The proponent proposes to extend the hours of operation relating to operational activities as set out in Table 5 of Condition 39.

The area of operations to which the conditions apply is not proposed to be modified by the subject application, refer to proposed hours outlined in Table 4 below. The approved layout of the site (as most recently amended by Mod 5) is shown in **Attachment A**.

Table 4: Proposed modification to Table 5 of Condition 39

Area	Activity	Day	Time
Construction			
		Monday – Friday	7:00am to 6:00pm
		Saturday	8:00am to 4:00pm
		Sunday and Public Holidays	Nil
Operations – including the receipt, processing and landfilling of materials			
MPC and PSE	Receive Materials	Monday – Sunday	24 hours
	Operations	Monday – Sunday	24 hours
SMA	Receive Materials	Monday – Sunday	24 hours
	Crushing and Screening	Monday – Sunday	6:00am to 6:00pm
Landfill	Receive Materials (by truck only)	Monday – Sunday	5am to 9pm
Landfill - Chute	Convey waste from MPC to landfill	Monday – Sunday	24 hours
Maintenance works			
MPC and PSE	Repairs to machinery	Monday – Sunday	24 hours

SMA	Cleaning and repairs to machinery.	Monday – Sunday	24 hours
Chute	Clearing of blockages and general repairs.	Monday – Sunday	24 hours

3.2.2 Waste

In addition to the amended and extended hours of operation set out in section 3.1.1, it is now requested that Modification 6 also include an amendment of condition 1 (a) under schedule 3, to delete condition 1(a).

The conditions, as proposed to be amended, would read as follows:

WASTE

Limits on Input

1. The Proponent shall not:

~~a) landfill more than 700,000 tonnes of non-putrescible waste per calendar year;~~

b) b) receive or landfill putrescible waste on site;

c) c) stockpile more than 50 tonnes of tyres on site at any one time;

d) d) stockpile more than 20,000 tonnes of green waste on site at any one time.

e) e) receive waste on site that is contaminated by chemicals and/ or pathogens that will not be

f) rendered harmless by the process or that may constitute a health or environmental risk,

g) including clinical and related waste and diseased carcasses; and

h) f) receive waste on site containing contaminants classified as hazardous waste, restricted

i) waste (other than asbestos) or liquid waste under the POEO Act.

For the avoidance of doubt, the Proponent is ***NOT*** proposing to increase the overall tonnes that may be accepted at the Genesis Facility, it is simply proposing more flexibility as between the aggregate total amount permitted by the respective operating EPLs with regards to volume of waste materials that may be accepted into landfill.

Condition 5 "Limits on Approval" would remain as follows:

The Proponent shall not receive more than 2 million tonnes of materials at the site per calendar year.

4.0 Project need and planning justification

As set out above and in earlier sections of this amended SEARs request, the proposal seeks to achieve the following:

- extension of hours;
- flexibility in relation to landfill capacity by removing the 700,000 tonnes/per annum cap.

As justification for the modification is set out in each of the following sections.

4.1 Extension of Hours

The proponent is seeking to extend general operations including covering waste within the landfill, operation of the MPC and chute, extended delivery hours and the ability to undertake out of hours maintenance and cleaning of plant.

The Project need and justification for proposed extended operating hours is five-fold.

Firstly, to accommodate loss in production time arising from the operator's commitment to ensuring a safe and efficient workplace environment. The plant and machinery is complex and it is necessary to ensure that all components are at all time working effectively and harmoniously in order to ensure an effective production result.

Secondly, to facilitate acceptance of loads of waste received from night projects (ie roadworks).The extended operating hours would allow receipt of material from night projects (ie roadworks), which presents a much more viable option than storing the waste on the side of the road until a facility opens the next day.

Thirdly, to facilitate acceptance of loads of waste during the operation of large projects. The extended operating hours provide a greater window for receipt of waste and sale of product when large projects are underway and either producing large volumes of waste or consuming large volumes of recovered materials.

Fourthly, to help streamline and facilitate the proper removal and disposal of asbestos and contaminated soils, by providing a facility which can receive such materials with longer operating hours. Most existing facilities, which are licensed to accept such wastes will only accept asbestos loads before 4pm (usually due to opening hours constraints and daily cover requirements). The extended operating hours may also have a positive effect in the community by decreasing illegal dumping of such substances, given the facility provides a suitable venue for receipt and proper disposal of such substances for a longer period of time each day.

Fifthly, to facilitate the safe disposal of increased amounts of wastes such as asbestos soils from a variety of state road and infrastructure projects which are currently proposed or already underway.

The environmental management procedures have been developed in accordance with best practice to maximise resource recovery and minimise biodegradable material from being land-filled in accordance with relevant legislative requirements.

The MPC site also benefits from the construction of impervious barriers at various positions around the facility being a requirement under the Project Approval.

The processed materials (from the MPC plant) leaving the conveyor at the rear of the MPC facility are dry materials with no odour. Previous odour testing at the facility has demonstrated that the materials being produced in the MPC and SMA are very low odour producing in any event.

4.2 Need for Flexibility to respond to changes in market conditions

In addition to this, the proponent is seeking greater flexibility with regards to the amount of waste that can be accepted at the landfill premises. Currently, the Genesis facility has approval to accept up to 2 million tonnes of waste per annum.

Of this two million, a maximum of 700,000 T is permitted to be landfilled. The proponent seeks greater flexibility with regards to increasing the amount permitted to be landfilled (without breaching the 2 million tonne overall limit of the facility).

The proponent is seeking this amendment, due to an overwhelming number of state road and infrastructure projects which have been commissioned in the Greater Sydney Area. These have involved the compulsory acquisition of privately owned buildings and old infrastructure and the uncovering of old asbestos in the form of pipes and sheeting. The Proponent assesses that this development will likely involve an increased demand for landfill space for wastes such as asbestos soils, which can legally be accepted under the landfill licence.

A significant and increasing amount of waste is being transported interstate for processing and disposal by landfilling. The economic drivers for this include the high level of landfill levy imposed in NSW under the POEO Act and the fact that there is no corresponding levy in Queensland. The arbitrage between the respective regimes means that there is a rapidly changing ebb and flow of materials for landfill versus materials for reprocessing and recycling available to the Proponent.
NSW EPA has recently foreshadowed the introduction of new regulations to manage waste within NSW waste facilities and the Proponent seeks the flexibility to be able to respond to the expected commercial effects of these changes.

5.0 Potential environmental impacts

This chapter discussed the potential environmental impacts resulting from the modification and also identifies any potential consequential impacts resulting from the extended operating hours. The Proponent identifies the risks involved and outlines the mitigation / management for each consequential impact.

5.1 Potential impacts

The Proponent has identified and examined the following potential environmental impacts of this modification which it is seeking. These include, in order of potential adverse impacts:

1 Noise;
2 Traffic;
3 Air Quality; and
4 Odour.

Table 5 - Proponent's environmental risk assessment

Environmental risk assessment	
Noise	Minimal additional noise impacts are anticipated. However, further technical assessment may need to be provided to determine the effects on the nearest residential receiver and whether the noise limits might be exceeded.
Traffic	As outlined above, the proposal does not involve an increase in the approved maximum capacity of the operation. Accordingly, an increase in overall vehicle movements is not anticipated. Extending the hours of operation may alter the pattern of vehicle movements with trips becoming more spaced out across the day and night. There is limited potential for road traffic noise to affect residential areas as the site is located within an operating industrial zone (that supports existing 24 hour uses) that is accessible via arterial and industrial road networks. Notwithstanding the above, a traffic assessment will be undertaken following the issue of the amended SEARs and be considered in any further application.
Air Quality	In full operation negligible particulate emissions leave the facility. A network of sprinklers already surround the MPC and SMA to wet down sealed roads and to ensure that any materials deposited on site remain wet. Air Quality Assessment and Compliance testing previously undertaken by Pacific Environmental Limited and submitted to the NSW Department of Planning and Infrastructure indicates that the Facility when operating at full capacity, [indoor and outdoor activities] including

Environmental risk assessment	
	crushing screening grinding and land-filling meets all environmental goals and standards for the Facility. There have been no complaints about the facility having any impact on air quality to date. External process, crushing grinding or screening is not proposed to occur beyond the presently permitted hours.
Odour	There will be no odour impacts resulting from this proposed modification, no putrescible material is authorised and no composting of garden waste is being carried out. Odour is never an issue observed during MPC operations. The modification does not involve the processing composting storing managing or otherwise dealing with greenwaste or biodegradeable materials liable to generate odour. Small dry (less than 300mm length) timber pieces recovered from co-mingled demolition wastes are recovered and stored in the bunded stockpile area to the west of the MPC.

The Proponent has assessed the key potential environmental impacts above and formed the view that there are no adverse environmental impacts resulting from the proposed modification.

If you wish to discuss, please contact the writer on 02 8596 6304.

Yours sincerely,

ALICIA MARIX-EVANS
SOLICITOR