9.0 Statement of Commitments

In accordance with the DGRs issued by the Director-General for Planning, a draft Statement of Commitments (SoC) is required to be included within the Environmental Assessment (refer to **Table 9.1**). The draft SoC provides a list of commitments that SITA is prepared to make to minimise or avoid the environmental impacts of the SAWT-BIOWISE facility (refer to potential environmental impacts and mitigation measures outlined within **Sections 5, 6** and **7**).

The draft SoC will be finalised following consideration of the feedback received during the public exhibition of the EA.

Table 9.1: Draft Statement of Commitments for Advanced Waste Treatment Facility, Elizabeth Drive

Prior to Construction	
Environmental Outcome (Commitment)	**Measure (Commitment)**
1.1 Environmental Protection and management	• A Construction Environmental Management Plan (CEMP) will be prepared in accordance with the conditions of approval, this Environmental Assessment and all other relevant Acts and Regulations.
1.2 Minimise impact on flooding and hydrology	• During detailed design, all facilities and roads will be elevated above the 1 in 100 year AEP flood event or sufficient bunding will be provided. Protection will be provided to areas subject to erosion or inundation during a 1 in 100 year AEP storm event. • Runoff for all events up to and including the 1 in 10 year, 24 hour AEP event will be retained on site as described in **Section 4**. • Solid waste, which could potentially pollute stormwater runoff, will be handled in an enclosed building with concrete floors to limit the generation of leachate. • Sorting and composting will occur within an enclosed building. Condensate from composting tunnels and biocells will be recycled in the composting process, which will prevent leachate discharge to other parts of the SAWT-BIOWISE facility. As the composting process is a net user of water, leachate discharge from the process is highly unlikely. • Maturation and green waste storage will be carried out on specifically designed hardstand areas that have suitably low permeability to prevent infiltration of leachate into the groundwater. Any leachate from the maturation and green waste storage will be drained to the leachate pond. • All drainage paths will be designed to prevent ponding and infiltration into the groundwater as a result of standing water. • Leachate storage and treatment ponds and stormwater storage ponds will be lined with a low permeability liner to control infiltration into groundwater.
Minimise impact from odour emissions	Odour can be generated at the SAWT-BIOWISE facility as a result of mixed waste processing and degradation of organic components. The SAWT-BIOWISE process requires both indoor and outdoor operations. The outdoor operations are susceptible to changes in weather and require careful attention. Several mechanisms that either limit odour generation or provide odour mitigation have been incorporated into the design of the proposed layout. These include: • Provision of enclosed facilities for all parts of the SAWT-BIOWISE process, except maturation and green waste shredding. • Roller doors in the Receival Building to enable the openings to be closed at all times other than

Prior to Construction	
Environmental Outcome (Commitment)	**Measure (Commitment)**
	loading/unloading. • Biofilters for treatment of all air within the Receival, Resource Recovery and Composting buildings. • Maintenance of oxygen and moisture levels and feedstock composition within optimum range for composting. • Aeration of the leachate and stormwater ponds as required to ensure the ponds remain aerobic. • Preferential reuse of stored leachate in the composting process to avoid long-term storage of leachate. • Appropriate storage of biosolids (tank or covered pit) if/when they are accepted. Monitoring will be undertaken to determine that the majority of emissions pass through the biofilters and that potential off-site odours can be appropriately controlled. If necessary implementation of alternative odour mitigation will be considered to enable acceptable odour levels to be maintained throughout operation of the SAWT-BIOWISE facility. SITA will implement a transparent and efficient Customer Feedback program whereby odour complaints can be registered and investigated. An odour complaints registration, investigation and response procedure will be implemented at the SAWT-BIOWISE facility.
Minimise impact on visual amenity and landscape	To address the visibility of the SAWT-BIOWISE facility in context with the surrounding landscape, buildings have been designed to sit at an elevation as low as practicable on the SAWT-BIOWISE Site, without compromising flood protection or drainage design. SITA also proposes to retain as many trees and other vegetation as practicable. This will provide screening for the completed SAWT-BIOWISE facility, and also maintain the semi-rural character of the area.

Construction Phase	
Environmental Outcome (Commitment)	**Measure (Commitment)**
The proposed SAWT-BIOWISE facility will be constructed in accordance with the proposal contained in the Environmental Assessment, June 2007	The SAWT-BIOWISE facility will be constructed in accordance with CEMP.
Minimise impact on geology, soils and groundwater	An Erosion and Sediment Control Plan (ESCP) and/or Stormwater Management Plan (SWMP) will be prepared as part of the Construction EMP to ensure that impacts associated with construction are appropriately managed. The specific mitigation measures that will be applied to control erosion and soil related impacts are: • An ESCP and/or SWMP will be prepared and implemented in line with Edition 4 of the Department of Housing's *Managing Urban Stormwater Guidelines* (2004) 'Blue Book' prior to the commencement of works. • Regular inspection of the work site will be undertaken during construction activities to ensure that the ESCP and/or SWMP is properly implemented and maintained. • Geofabric sediment fences will be temporarily installed down slope of disturbed areas where there is the potential for runoff to enter Badgerys Creek. • Temporary stockpiles will not be located adjacent to drainage lines. • Vegetation clearance and soil disturbance will be limited to areas required for construction. • Revegetation of disturbed areas will occur (where practicable) immediately after completion of works in that area. • In the event that unexpected contaminated material is disturbed during earthworks, controls will be implemented to divert surface runoff and the material will be removed from the Site and disposed of at an approved site.
Minimise impact on surface water quality	A Water Quality Management Strategy will be developed for sediment control during construction and operation. The following measures will be adopted: • Temporary erosion controls will be provided where necessary. • Permanent stabilisation of embankments, channels, etc. will be achieved through vegetation and will be carried out promptly. • Construction will be staged and progressive rehabilitation undertaken to minimise the area available to erosion at any one time.
Minimise impact on flora and	To offset the removal of some severely degraded and isolated small pockets of Cumberland Woodland, a revegetation program will be initiated in discussion with LANDCARE and DECC along the north west boundary. It is envisaged that

Construction Phase	
Environmental Outcome (Commitment)	**Measure (Commitment)**
fauna	the revegetation program will include species affiliated with Cumberland Woodland vegetation association. A Vegetation Management Plan including a re-planting program will be developed including details on: • Ongoing preservation of riparian vegetation and the protection of fauna habitat. • Clearing limits will be clearly marked and fenced prior to construction to prevent accidental impacts to adjacent vegetation. • No heavy machinery will be permitted access outside of clearing limits. • No building materials (including spoil mounds) will be stored or placed outside of clearing limits. • Revegetation of areas within the 'River Flat Eucalypt Forest endangered ecological community' (Badgerys Creek Riparian Community) will be considered. • The area of Badgerys Creek Riparian Community, adjacent to the SAWT-BIOWISE Site, will remain restricted to staff of SITA and persons will enter this area only for the purposes of vegetation management and environmental monitoring. • An active program of weed management will be implemented. • The mature Angophora will be fenced prior to clearing to avoid disturbance. • Non-residual herbicides will be used, on an as-needed basis, to control weeds. • A referral will be sent to the Department of the Environment and Water Resources (DEWR) in regards to the clearing of Cumberland Plain Woodland, a listed EEC under the EPBC Act. • Prior to construction conduct a targeted survey for threatened flora. In addition to these measures, SITA have implemented a programme of revegetation along the northern boundary of the Elizabeth Drive Site with species consistent with Cumberland Plain Woodland vegetation association. This revegetation commenced in 2004 in co-operation with LANDCARE, such that 2,000 trees have already been planted in this area. Key objectives of replanting would be to replace any remnants of Cumberland Plain Woodland that have already been removed from the Elizabeth Drive Site during historical (pre-SITA) quarrying/land clearing practices. This planting will also serve as a vegetative screening barrier along this boundary.

Construction Phase	
Environmental Outcome (Commitment)	**Measure (Commitment)**
Minimise impact on air quality	The following practices and procedures will be adopted to ensure that dust levels are adequately controlled: • Regular cleaning of the site haulage and access roads. • Dust suppression on unsealed roads and work areas using a water cart. • Minimising traffic movements on exposed areas. • Minimising heavy vehicle trip distances and speed within the Elizabeth Drive Site. • Dampening of temporary stockpiles. • Removing mud from vehicles before leaving the Elizabeth Drive Site, where necessary. • Cleaning up materials that might act as dust sources, as soon as possible. • Progressive rehabilitation of cleared land. • Conducting regular maintenance of machinery and vehicles. • Ensuring any procedures for outdoor activities include a requirement for dust minimisation. Providing awareness training in the importance of minimising dust generation at its source. The following practices and procedures will be adopted to ensure that dust levels are adequately controlled: • Waste handling within enclosed buildings, except for green waste. • Locating compost maturation and compost feedstock stockpiles away from sensitive receptors. • Dampening of stockpiles. • Limiting storage size of green waste to reduce potential for dust nuisance. • Conducting regular maintenance of machinery and vehicles.
Minimise impact on heritage	The riparian precinct will remain fenced and padlocked to ensure that contractors do not enter the KC/1 vicinity and that storage, building rubble and spoil materials are excluded. SITA recognises that it is an offence to remove, disturb or destroy any Aboriginal relic in NSW without the prior written consent of the Director-General of DECC. Should any Aboriginal archaeological relics, deposits or sites be located or exposed during any SAWT-BIOWISE Site works, all works with the potential to disturb the site will cease immediately and DECC will be contacted to confirm a course of action.

Construction Phase	
Environmental Outcome (Commitment)	**Measure (Commitment)**
Minimise impact on surface water quality	**Stormwater and Leachate** • Stormwater affected by the proposed SAWT-BIOWISE facility has been divided into diverted stormwater and 'clean' site runoff. The SAWT-BIOWISE Site will be graded to ensure that stormwater is diverted appropriately and undergoes the level of treatment as required by regulation. Roads will be graded to prevent uncontrolled runoff. All stormwater will be captured and retained on site up to and including the 1 in 10 year, 24 hour duration event. • Storage of stormwater runoff will be suitably managed to ensure as much re-use, and thereby reduction in potable water demand, as is practicable. This type of water will be used for application in the SAWT-BIOWISE process, or it will be directly used for operational purposes (irrigation and dust suppression). • All leachate will be retained and re-used on site. Condensate leachate and leachate from cleaning will be temporarily stored in closed containers before being re-used in the composting process. Stormwater leachate will be treated through bioretention before being temporarily stored in Sedimentation Pond A and re-used as discussed in Section 4.6. As with stormwater re-use, this will have the added benefit of reducing the demand for potable water. The pond will be lined to a suitable permeability to prevent leachate leakage. • Re-use of process and product-related leachate and additional use of stormwater runoff to the extent that is practicable, will prevent the discharge of untreated water from the SAWT-BIOWISE facility, and stormwater discharged to Badgerys Creek will not increase. The waste will be received under cover in the Receival and Resource Recovery Buildings to avoid contact with stormwater and hence stop potential pathogen transfer via wind and/or water.
Minimise impact from greenhouse gas emissions	In order to minimise the impact from greenhouse gas emissions, the following procedures will be used: • The composting of waste under aerobic conditions produces less methane than the anaerobic decomposition of waste which occurs within a landfill. This greatly reduces the amount of methane being released to the atmosphere, and the magnitude of greenhouse gases produced overall. • Over the past ten years approximately 3500 new trees have been planted by SITA. SITA propose to plant a further 300 trees, further reducing the impact of any greenhouse gas emissions.

Construction Phase	
Environmental Outcome (Commitment)	**Measure (Commitment)**
Minimise impact from noise during operation	**A Construction Noise Management Plan will be prepared within the CEMP** SITA would propose to install mitigation measures at Caretaker's Cottage after the appropriate negotiation with Council and/or affected landowner.
Minimise impact on visual amenity and landscape	At the completion of construction of the SAWT-BIOWISE facility, the riparian area will be further landscaped with native flora species endemic to the locality. SITA has previously undertaken substantial planting around the perimeter of its Elizabeth Drive Site. Location of new trees and native flora will be complementary with stormwater drainage design, water storage, water treatment, vehicle movements and LANDCARE advice. In addition to providing screening for buildings, the vegetation and trees will also act as a buffer to prevailing winds. Even though most of the machinery and equipment comprising the SAWT-BIOWISE facility does not need to be housed for its operation, much of it has been enclosed to reduce other impacts such as noise and odour. Enclosing machinery reduces the visual impact of the SAWT-BIOWISE Site. An appropriate range of building materials, colours and textures will be integrated into the current building designs and hard surfaces to take account of surrounding landscape colours, seasonal changes and variable light conditions Given the semi-rural location, SITA will take care to minimise the amount of light spill impacting on local fauna. Consideration will be given to use of directional lights that limit light spill. Mobile equipment will be fitted with headlights as opposed to permanent lighting masts, where feasible.
Minimise the risk of fire hazard	To minimise the risk of fire and fire hazards on and around the facility the following procedures and measures will be implemented: • Inform staff when extreme fire danger conditions exist. • Monitoring of extreme fire danger conditions and fire bans. • Procedures written for the SAWT-BIOWISE facility based on receiving and reporting of 'hot' loads. • Temperature monitoring and control in composting process, buildings and maturation stockpiles.

Construction Phase	
Environmental Outcome (Commitment)	**Measure (Commitment)**
	• Smoking prohibited within the SAWT-BIOWISE facility, composting areas and near equipment maintenance facilities and the use of designated smoking areas. • Strict controls over welding or other 'hot' works that may produce sparks. • Facility Evacuation Plan and procedures. • Reporting of incidents to the Emergency Co-ordinator. • Adequate provision of water supply in close proximity to the SAWT-BIOWISE facility. • Fire fighting equipment installed within SAWT-BIOWISE facility and staff training in its use. • A water cart will be available on site. • Contaminants that may be combustible will be stored in metal skip bins and removed before the bin is full. • Fuels and flammable solvents stored in appropriately constructed areas, including bunds and spill management equipment. • The use of appropriate fire-fighting design as required by the Building Code of Australia. • Diesel for equipment fuelling will be stored on site in a tank with associated fittings and pipelines designed to comply with Australian Standard AS1940:2004 (Storage and Handling of Flammable and Combustible Liquids.) The tank would be contained within a bunded area which would not be linked to any other part of the site. The bund would have the capacity of 110% of the tank capacity. • Maintenance of a buffer firebreak zone between built structures and natural vegetation surrounding the Elizabeth Drive site. Smoking prohibited within the SAWT-BIOWISE facility, composting areas and near equipment maintenance facilities. • Strict controls on activities likely to generate sparks (e.g. welding). • Adequate provision of water supply in close proximity to the SAWT-BIOWISE facility. The SAWT-BIOWISE facility is a net user of water and as such a supply of water will always be maintained.
Minimise potential health and safety impacts to workers and future users of the compost material	• The SAWT-BIOWISE process will be maintained at a temperature to inactivate parasites and destroy most weed seeds. The temperature will be controlled to ensure that beneficial micro-organisms are not immobilised. • Temperature will also be controlled by the monitoring and control of moisture content within the composting materials. Moisture will be monitored and the addition rate of water/leachate will be controlled to maintain the required moisture content, which in turn will promote the composting process and maintain the required temperature. • Pathogens will be controlled in the SAWT-BIOWISE process during active composting taking place within the

Construction Phase	
Environmental Outcome (Commitment)	**Measure (Commitment)**
	composting tunnels and biocells. • Oxygen content will be constantly monitored during the active composting phase and airflow will be controlled by either/both the air intake or/and air extraction capacity for each tunnel or biocell. • The contents of each tunnel and biocell will be turned as required to ensure thorough mixing and hence composting of all material. • Mechanical waste handling equipment, such as front-end loaders, will be provided in the Receival Building, the Resource Recovery Building, and for processes associated with the composting tunnels and biocells and the Maturation Pad. The loaders have air-conditioned cabins that provide filtered air to the driver. • Biosolids, if accepted at the facility, would be discharged directly into a sealed tank/pit to avoid human contact; • Provision of specifically-designed air-conditioned rooms that incorporate air-conditioned ducting systems to provide fresh air for workers in the Manual Recovery Room located within the Resource Recovery Building. • Conveyors designed to minimise heavy lifting and associated strain injuries or other movements that could result in workers falling into the waste will be installed. • The spread of disease by nuisance animals such as feral cats, rats and birds will be controlled by undertaking the entire SAWT-BIOWISE process in fully-enclosed buildings and installing security fencing around the property. • Transportation of waste to the SAWT-BIOWISE facility will occur in enclosed vehicles to avoid leakage and spillage onto roads and hence any potential health risks associated with the public coming in contact with material being delivered to the SAWT-BIOWISE facility. • Appropriate authorisation from NSW Agriculture will be obtained in regard to any transfer of compost to *Phylloxera* exclusion zones. • Compost and recyclables exiting the SAWT-BIOWISE facility will be transported in vehicles that comply with RTA requirements and will generally be in the type of vehicles usually associated with this form of transport. A high level of plant hygiene is required to prevent incidents associated with all forms of bacteria and pathogens. Accordingly, a number of workplace, health and safety procedures will be added to the SITA Health and Safety Management System. The new procedures will be put in place to minimise risks to the workers from the material arriving at the proposed SAWT-BIOWISE facility. These procedures will include: • Staff training prior to the commencement of work under workforce supervision. • Use of gloves by all workers at all times to avoid transferring material and potentially pathogenic material from

Construction Phase	
Environmental Outcome (Commitment)	**Measure (Commitment)**
	hand to mouth. • Compulsory use of washing facilities prior to meal breaks and before leaving the SAWT-BIOWISE Site. • Use of facemasks as necessary by staff when working outside rooms with forced ventilation and air-conditioned mobile plant machinery cabins. • Use of protective clothing such as overalls. • Worker health checks and monitoring. • Safe work procedures. • Hearing protection in certain areas of the SAWT-BIOWISE facility, as required.

Pre-Operational Phase	
Environmental Outcome (Commitment)	**Measure (Commitment)**
The proposed SAWT-BIOWISE facility will be operated in accordance with the proposal contained in the Environmental Assessment, June 2007	• An Operational Environmental Management Plan will be prepared and implemented addressing the operational mitigation measures proposed in the Environmental Assessment, Statement of Commitments and the Conditions of Approval. This includes relevant parts of Plans made under the Statement of Commitments.

Operational Phase	
Environmental Outcome (Commitment)	**Measure (Commitment)**
The proposed SAWT-BIOWISE facility will be operated in accordance with the proposal contained in the Environmental Assessment, June 2007	• The SAWT-BIOWISE facility will be operated in accordance with the OEMP.
Minimise impact from odour emissions	• SITA will undertake further odour testing to ensure the SAWT-BIOWISE facility has no adverse effects on neighbouring properties.
Minimise impact on flora and	• To offset the removal of some severely degraded and isolated small pockets of Cumberland Woodland, a

Operational Phase	
Environmental Outcome (Commitment)	**Measure (Commitment)**
fauna	revegetation program will be initiated (in discussion with LANDCARE & DECC) along the north-west boundary. It is envisaged that the revegetation program will include species affiliated with Cumberland Woodland vegetation association. • An active vegetation management program will be initiated. This will provide the buffering from the development to the riparian zone.