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14 May 2012

Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Andrew Hartcher

Dear Mr Hartcher,

ADDENDUM TO MINOR MODIFICATION OF PROJECT APPROVAL MP09_0025

This letter forms an addendum to the current application to undertake a minor modification to Project Approval MP09_0025. This addendum seeks to clarify the details of the minor modification application with reference to the Project Approval requirements and in response to issues raised during the public advertising period with respect to the design, appearance and layout of the sites.

Additionally, as a result of steps taken to discharge the conditions of the project approval, together with the details of the modification application, it is recommended that the Project Approval commitments be reviewed in line with **Table 1** attached.

Please find attached a drawing set, **Drawings EV01 – EV16, Issue E**, that has been prepared to clarify the changes to the design, appearance and layout of the sites as described below. The proposed amendments are consistent with Project Approval MP09_0025 and have occurred as a result of detailed design of the facilities, in consultation with the facility operator.

Arrangement of Buildings at Euchareena Road

Following the award of tender for operations, detailed design has been undertaken. **Drawings EV14** and **EV15** demonstrate the layout of buildings at Euchareena Road as per the Project Approval and provide an amended layout prepared by the contractor. Confirmation of this revised layout is sought via the modification application.

The layout of buildings, including the orientation of the composting maturation area and the size, location and orientation of key buildings, is shown in detail on the above mentioned drawings. It is acknowledged that the layout has changed from that submitted with the minor modification application; however the change represents a reduction in bulk and scale of the buildings at the site. Future composting tunnel additions anticipated in the Project Approval are still shown for clarity.

This change in the layout of the buildings has been influenced by a drive to improve operational efficiency of the operations. The proponent has moved the maintenance building and education buildings away from the composting buildings; the maintenance building being moved to the north-east side of the internal road (as shown on **Drawing EV14**), and the education functions returning to the Ophir Road site, to be developed at a later date. The relocation of the maintenance building enables the proponent to undertake minor maintenance and storage of equipment relating to the landfill site, without impacting the contractors composting operations. The relocation of education facilities, as referred to in the advertised modification application, is addressed overleaf.

The change to the layout of the composting buildings has occurred as a result of detailed design by the contractor, who has practical experience with the operational undertaking of resource recovery

and composting operations. The proposed layout provides a viable design coupled with a more logical pattern of development for the undertaking of day to day operations.

Appearance of Buildings at Euchareena Road

The humid conditions associated with composting operations require that all materials will need to be of the highest corrosion resistant standards to ensure that the buildings are maintained in a good state of repair. The commitments to Project Approval MP09_0025 set out that all buildings are to be clad with materials either coated or painted with a light green hue. It has been determined that it is not possible to source metal cladding that meets both the colour and corrosion resistance requirements. Instead it is proposed to use a more robust metal cladding with a limited colour palette. It is proposed that the cladding on the roofs of the organics receival building and biofilter will be grey (Colorbond® steel Dune) in colour. The building walls on the northern and southern elevations will be concrete push walls at the lowest three (3) metres of the building, with grey cladding above (Colorbond® steel Windspray) – see **Drawing EV16**. The higher standard (Ultra) product is consistent with colours used in the area and it is also more able to weather the condensation impacts that might be anticipated on opening of the compost tunnels. The standard and colour of the metal cladding will be consistent with existing facilities in the area.

It is recommended that the modification consent include a condition that requires that the colour of the buildings be consistent with the appearance of existing buildings in the locality, and that the buildings should not be a light colour, in order to minimise reflection. At Euchareena Road buildings should be a grey or similar hue in order to effectively meet the suggested condition.

The Euchareena Road receival building would be enclosed on the three production sides as stated above, and open at the receival area (east elevation). It is understood that the Department seeks clarification on this topic, specifically with respect of any impact of this design on air quality and noise emissions.

It is noted on page 33 of Appendix O of the GHD Environmental Assessment, prepared by Heggies Pty Ltd and submitted in support of the original application, that the receival hall at Euchareena Road would not be fully enclosed. It follows that this assumption forms the basis of the reports prepared by Heggies.

Air Quality

It is noted on page 31 of Appendix O of the GHD Environmental Assessment, entitled *Euchareena Road Resource Recovery Centre Air Quality Assessment*, that the following assumptions were made in the preparation of the report (bold added for emphasis):

*It has been assumed that as the front-end loader operation, waste unloading and shredding is carried out within the composting plant, a 30% particulate reduction factor has been applied, **relating to partial enclosure.***

The front end loader unloading the tunnels and moving material to the maturation pad has no controls applied.

An area of one landfill cell (approximately 9000m²) is assumed to be exposed to wind erosion at any one time.

It is assumed that an excavator or front end loader will unload trucks and load the landfill cells.

It has been assumed that 28 trucks will visit the site per day (ie. 56 truck movements), unloading 7.4t/hr of waste. It has been assumed that 7t/hr of waste being processed through the shredder.

The below statement is also noted at page 33 of the same report (bold added for emphasis):

*Emissions of odour are assumed to be generated and emitted constantly (ie 24 hours per day, 7 days per week) regardless of operation schedules. **It is noted that all the receival hall is not to be fully enclosed.** Therefore, emissions of odour have been assumed to be emitted from waste receivals and sorting. Odourous emissions from the composting tunnels are directed through the biofilter.*

On the basis of the above, it is demonstrated that the air quality assessment was undertaken on the basis of the receival building not being fully enclosed and therefore the current design as described will not have any greater impact than that which was approved.

Noise Emissions

A review of Appendix Q of the GHD Environmental Assessment, entitled *Euchareena Road Resource Recovery Centre Noise Assessment*, sets out that noise modelling was undertaken on the basis that the receival building would be used for the *'Mechanical pre-treatment of food wastes/garden organics and other organic solid wastes including physical contamination removal, shredding, mixing and homogenisation for subsequent composting of the raw material mix.'* (page 10, GHD).

As a condition of consent of Project Approval MP09_0025, all of the above mechanical pre-treatment activities were relocated to the Ophir Road site, thereby removing this noise source. As noted above, Heggies Pty Ltd has stated that it was assumed that the receival building would not be fully enclosed.

Notwithstanding that the primary noise sources, i.e., the mechanical pre-treatment operations, have been removed from the ERRRC site, the noise assessment concluded that even with these activities taking place at the ERRRC, noise impacts would be below the identified noise criterion at the three nearby residential receptors.

On this basis, it is therefore assumed that the intention that the ERRRC receival building be enclosed on the three production sides and open at the receival area would have insignificant impact on the nearby residential receptors by comparison to that which was approved, and in fact, the relocation of mechanical pre-treatment operations to the Ophir Road site would lead to a reduction in noise emissions.

Water Storage at Euchareena Road

Plans approved in respect of Project Approval MP09_0025 demonstrated the provision of a total of three on-site dams at the Euchareena Road site; two in relation to the land fill operations and one in relation to the composting operations. Following completion of a complex water balance analysis it is now proposed that the single dam relating to composting operations would be replaced by five dams, with dam function remaining unchanged. The water balance analysis was prepared to confirm that adequate water is captured at the site to enable the site to operate at an effective level. The analysis has determined that the on-site the facility requires five mega litres of water for operational activities. Dams C1 – C5, as shown on revised **Drawing EV14**, have a combined capacity of 10 mega litres. As such, it has been determined that sufficient water capacity is available, while the revised dam layout improves water saving for reuse.

The two dams relating to land fill operations would remain, however following the completion of detailed design, the size and location is proposed to be slightly modified, as shown on **Drawing EV13**. It is not anticipated that this minor modification will have any detrimental impact on water function at the site.

Building at Ophir Road

The Residual Waste Baling and Food and Garden Organics Building at Ophir Road is subject to a minor change by comparison to the drawings submitted with the minor modification application, being an increase of wall height by 500 millimetres. Despite the increase in wall height, the overall height of

the building will be reduced by 1 metre, from 13 metres to 12 metres, due to a reduction in roof pitch from 15 degrees to 10 degrees on the northern roof plane and a reduction in building width from 50 metres to 45 metres. This width reduction also results in a reduction in the building footprint from 3000 square metres to 2700 square metres.

This reduced building footprint and reduced overall height will result in an overall smaller building which should have a positive impact with respect to duration of construction and visual amenity impacts at the site. The building design is complemented by the varied colour palette as discussed below.

Colour of Buildings at Ophir Road

It is proposed that the Residual Waste Baling and Food and Garden Organics Building would feature walls of a light green hue (Colorbond® Pale Eucalypt) in line with the commitments of the project approval, however the roof would be grey (Colorbond® Dune) and the doors and shutters would be light brown (Colorbond® Paperbark), as shown on **Drawings EV05** and **EV06**. It is considered that this variation and use of complimentary colours would provide visual relief to better integrate the building into the landscape.

Education Facilities at Ophir Road

The modification application proposed the relocation of education facilities from Euchareena Road to Ophir Road. This relocation came about following discussions between the proponent and the contractor, and it has been agreed that these activities are more appropriately located at Ophir Road, where the majority of operational activities would be occurring.

These facilities were to be developed above the offices attached to the Residual Waste Baling and Food and Garden Organics Building as shown in the drawings submitted with the minor modification application. Following further discussions between the proponent and the contractor it is now proposed that education facilities would be maintained at the current location at the Ophir Road site, with exact siting to be determined at a later date. The NetWaste Environmental Learning Facility (ELF) at its current showground site will continue to act as the primary education facility, with no change proposed to current operations.

The current education operations at Ophir Road generate around 30 vehicle movements per year to the site, being 2 school buses per month, plus an additional 6 smaller vehicle per year attending educational tours; this information was included in the original Project information provided prior to approval.

As operations relating to education remain unchanged from those that currently exist it is not anticipated that this amendment to the modification application would have any detrimental impact on site operations or the surrounding area.

Commitments Update

Following the preparation and adoption of the Apiculture Risk Management Plan it is now noted that, in contrast to the current commitment in the Project Approval, bales will be wrapped year round to reduce the likelihood of bees accessing the material. It is recommended that the project commitments be updated to reflect this improved operating approach.

As noted earlier in this document, it has been determined that the provision of metal cladding with a high resistance to corrosion will result in a change to the proposed colour scheme. It is recommended that the project approval commitment be amended to acknowledge this, and that a condition be placed on the project approval to ensure that external materials match existing facilities in the locality, and are not reflective in nature.

Conclusion

This addendum provides clarification to the minor modification application, resulting from the appointment of an experienced contractor to operate the facilities. The contractor, in collaboration with the proponent, seeks to design the required facilities to the highest standard, whilst ensuring efficiency and economic viability. The addendum also addresses comments received during the public advertising period of the modification application. It is the proponent's view that the modification application remains consistent with Project Approval MP09_0025 and will deliver an operation of the highest quality.

Should you have any questions regarding the enclosed, please do not hesitate to contact either Orange City Council's Stephen Sykes on 02 6393 8215 or the undersigned.

Yours faithfully
Geolyse Pty Ltd



DAVID WALKER
Town Planner

No. of Attachments – 2

1. **Table 1:** Recommended project commitment amendments
2. Revised drawing set: **Drawings EV01 – EV16, Issue E.**

Commitments	Nature of amendment
Apiary	Bales will be wrapped year round in line with Apiculture Risk Management Plan (ARMP).
Visual	<p>Buildings at both sites shall be externally clad in materials that match existing buildings in the locality, and that are not reflective.</p> <p>Euchareena Road will be grey (Colorbond® Windspray walls and Dune roof) due to a need to use cladding that is highly corrosive resistant.</p> <p>The walls of the buildings at Ophir Road will be clad with materials that are a light green hue (Colorbond® Pale Eucalypt), roofs will be clad in grey (Colorbond® Dune) and doors and shutters will be light brown (Colorbond® Paperbark).</p>

Table 1: Recommendation amendments to Project Approval commitments.