

ASSESSMENT REPORT

Orange Waste Project - Site Layout Changes (MOD 1)

1. BACKGROUND

On 28 April 2010, following a review by the Planning Assessment Commission, the then Minister for Planning approved a major project application submitted by Orange City Council (OCC) for the Orange Waste Project.

The project incorporates two sites, one at Ophir Road in the Orange local government area (LGA) and the second at Euchareena Road in the Cabonne LGA. The project approval provides for:

- an expansion of the existing Ophir Road Resource Recovery Centre (ORRRC) in Orange; and
- the construction and operation of the Euchareena Road Resource Recovery Centre (ERRRC, including composting and landfilling operations) in Molong (see Figure 1).



Figure 1: Regional Context

Key components of the approved Orange Waste Project are summarised in Table 1 and depicted in Figures 2 and 3.

Table 1: Major components of the Project

Aspect	Description
Project Summary	Ophir Road Resource Recovery Centre
Proposed key infrastructure	- Baling facility - Organics shredding facility - Relocated Material Recycling Facility (MRF)
Proposed ancillary infrastructure	Internal roads
Proposed baling facility throughput	Approximately 20,000 - 26,000 tonnes per annum (tpa)
Proposed relocated MRF throughput	Approximately 10,000 - 13,000 tpa
Project Summary	Euchareena Road Resource Recovery Centre
Proposed key infrastructure	- Baled waste landfill - Enclosed tunnel composting facility
Proposed ancillary infrastructure	- Weighbridge and gatehouse - External roads and intersection - Stormwater management - Leachate management - Fences - Power supply - Internal roads - Amenities - Car parking
Proposed Euchareena Road landfill capacity	1.5 million m³
Proposed Euchareena Road landfill filling rate	Approximately 30,000 - 45,000 tpa
Proposed composting facility capacity	Approximately 15,000 - 20,000 tpa

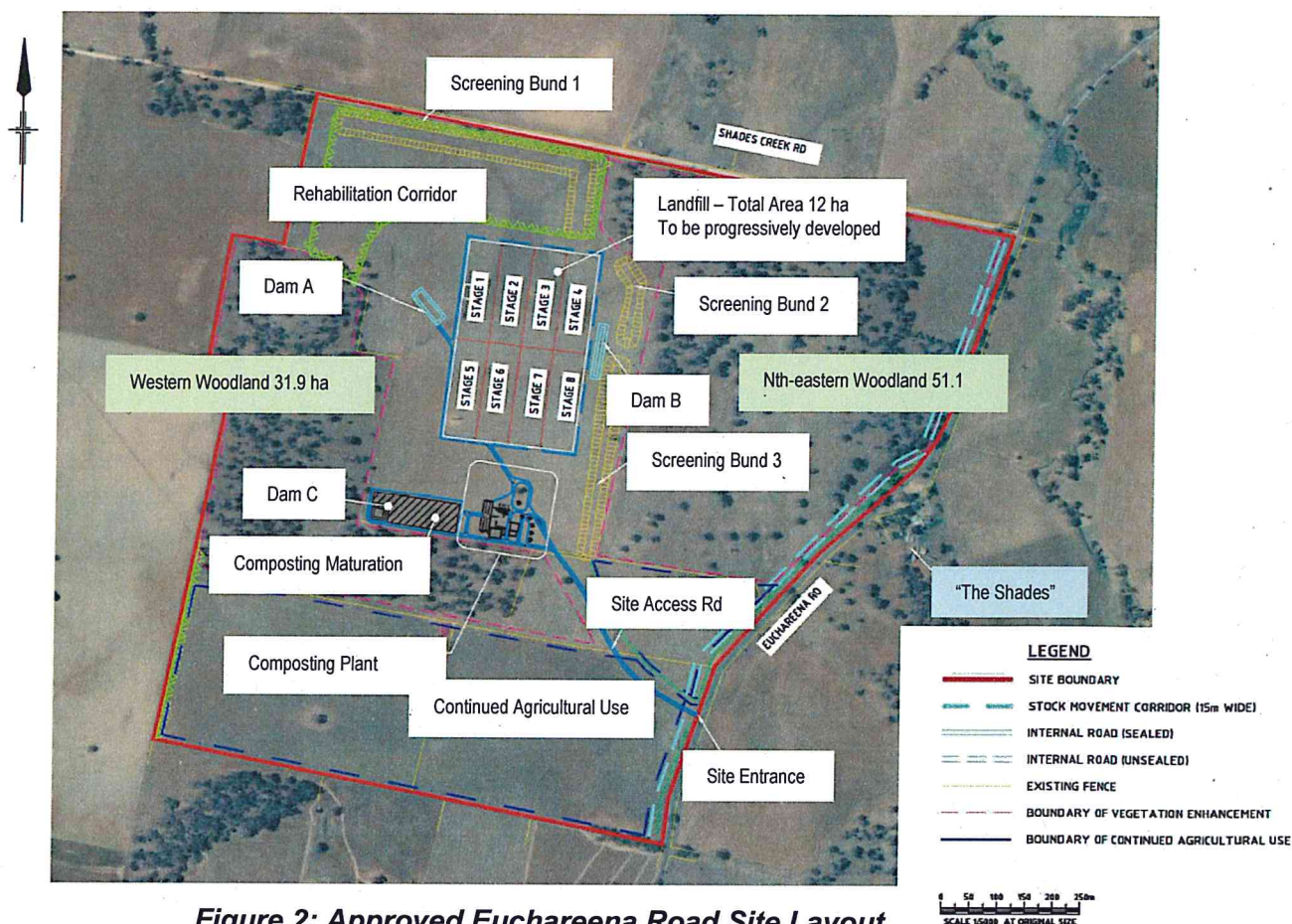


Figure 2: Approved Euchareena Road Site Layout

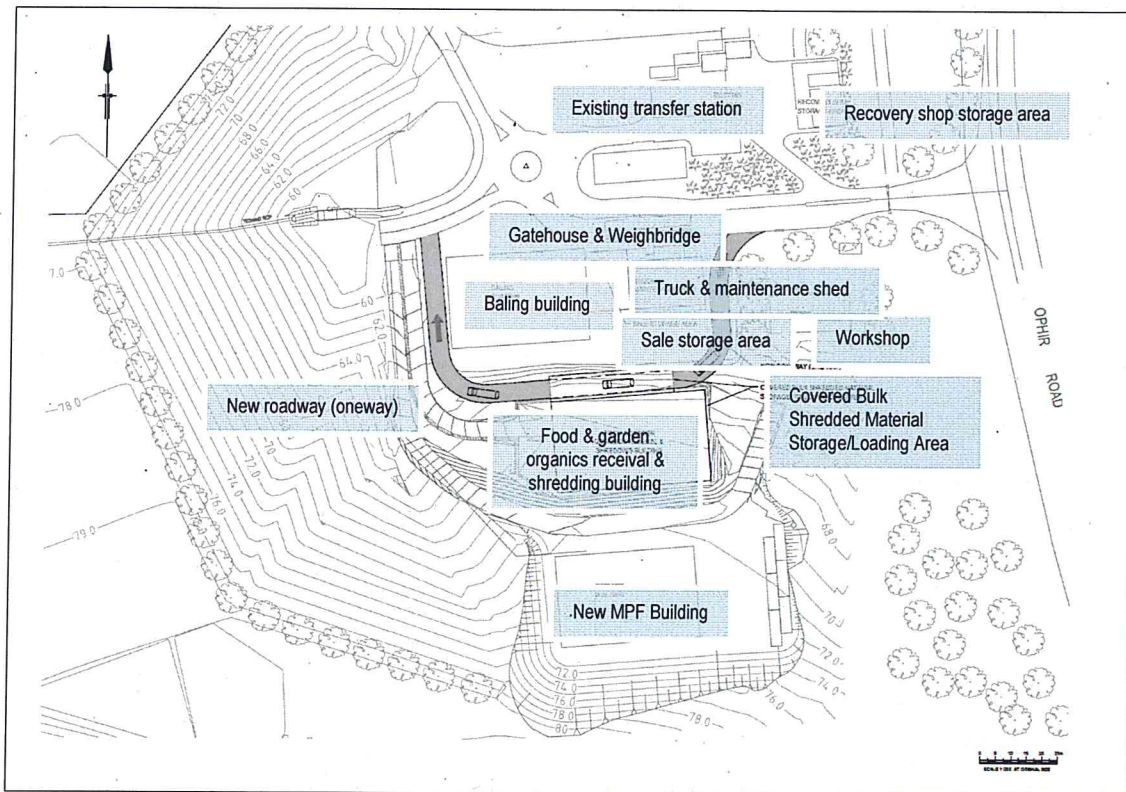


Figure 3: Approved Ophir Road Site Layout

The nearest residences to the ERRRC operations are the properties "The Shades" which is located approximately 800m to the east (see Figure 2) and "Hylands" which is located approximately 1,430m to the south. The nearest residence to the ORRRC operations is located approximately 400m to the south of the site.

The primary focus of the ORRRC site is on resource recovery. Waste is delivered to the site where recyclable material is recovered from the waste stream for reuse. The primary focus of the ERRRC site is on composting and landfilling operations. Food and garden waste is collected separately, combined with biosolids, processed in composting tunnels and placed in windrows before being on-sold as compost. Residual waste from both sites is landfilled at the ERRRC.

OCC recently made the decision to move away from a solely Council run facility and engage expert waste contractors to run the recycling and composting elements of the operations.

A tender was awarded for these operations at both sites and as a result, OCC identified a number of site layout and infrastructure changes that would be necessary at both sites to provide for the delineation between Council operated facilities and those operated by the waste contractors. This, in addition to finalising the project design changes proposed by OCC to improve operational efficiencies, has resulted in the need to submit an application to modify the project

Consequently, on 21 February 2012, OCC lodged a modification application with the Department under section 75W of the *Environmental Planning and Assessment Act, 1979* (EP&A Act) to revise the site layout.

2. PROPOSED MODIFICATION

Orange City Council is now seeking approval to:

- modify the design of the buildings and infrastructure at both the ERRRC and the ORRRC sites;
- modify the site layout at both the ERRRC and the ORRRC sites;
- relocate the approved education building from the ERRRC to the ORRRC site; and

- modify the internal road layout at both sites.

In particular, changes proposed at the ERRRC include:

- rearranging the layout and orientation of the composting buildings and infrastructure;
- replacing the water storage Dam C with 5 separate dams (C1 to C5);
- modifying the internal road network and reducing the amount of car parking spaces;
- relocating the weighbridge to the south;
- relocating the maintenance shed and landfill office to the north-east;
- relocating the education facilities to the ORRRC; and
- changing the colour of the buildings in order to be corrosion resistant.

The approved ERRRC site layout and proposed modifications are illustrated in Figures 4 to 6.

Specific changes proposed at the ORRRC site include:

- consolidating the approved food, garden and organics receipt and shredding building, the baling building and the bale storage area into a single building – referred to as the Resource Recovery Building (RRB);
- retaining the existing recycling facility and truck shed previously proposed for demolition;
- modifying the approved internal road network from a part one-way, to a part two-way roadway connecting the proposed RRB with the existing internal road network;
- incorporation of additional educational facilities; and
- changing the colour of the RRB to better integrate into the surrounding landscape.

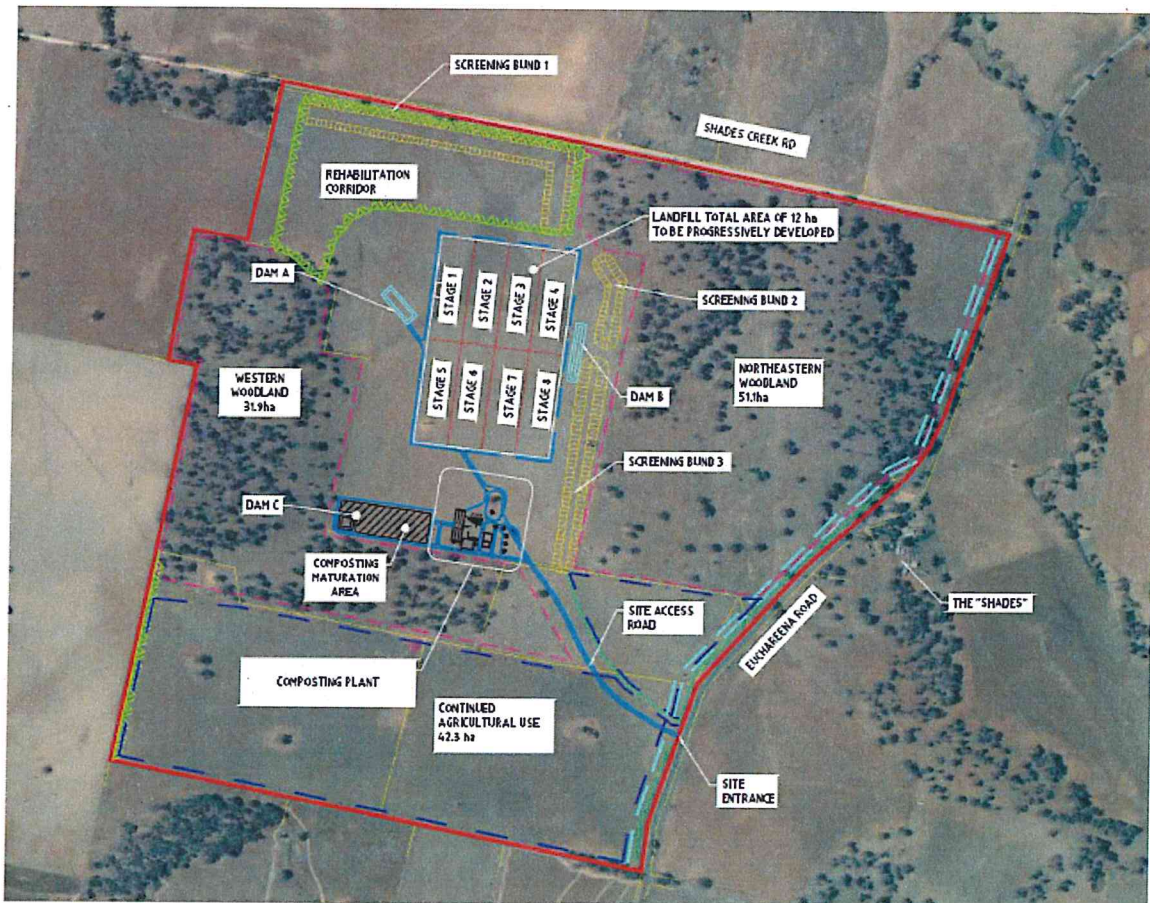
The approved ORRRC site layout and proposed modifications are illustrated in Figures 7 and 9.

Under the proposed modification, all waste baling and non-baleable waste would be bulked up, and organics shredding and blending operations conducted within the new RRB at the ORRRC.

The proposed modification would allow new buildings to be constructed at the ORRRC site with minimal disruption to the existing waste operations. Further, it would also allow OCC to separate Council operated facilities from the recycling and composting elements operated by waste contractors. All changes are designed to improve the operational efficiency of the waste operations at both sites. Notwithstanding this arrangement, the site would remain in the ownership of OCC.

The relocation of the educational facilities from the ERRRC to the ORRRC site has resulted from the Department's requirement to reduce traffic movements to the ERRRC site, an outcome of the original approval, and the accessibility of the ORRRC's to the more populous area of Orange. Further, the relocation of the shredding facilities to the ORRRC site, also resulting from the determination, means that the remaining operations at ERRRC will be largely passive.

No change is proposed to the volume of waste permitted to be received or processed at either site.

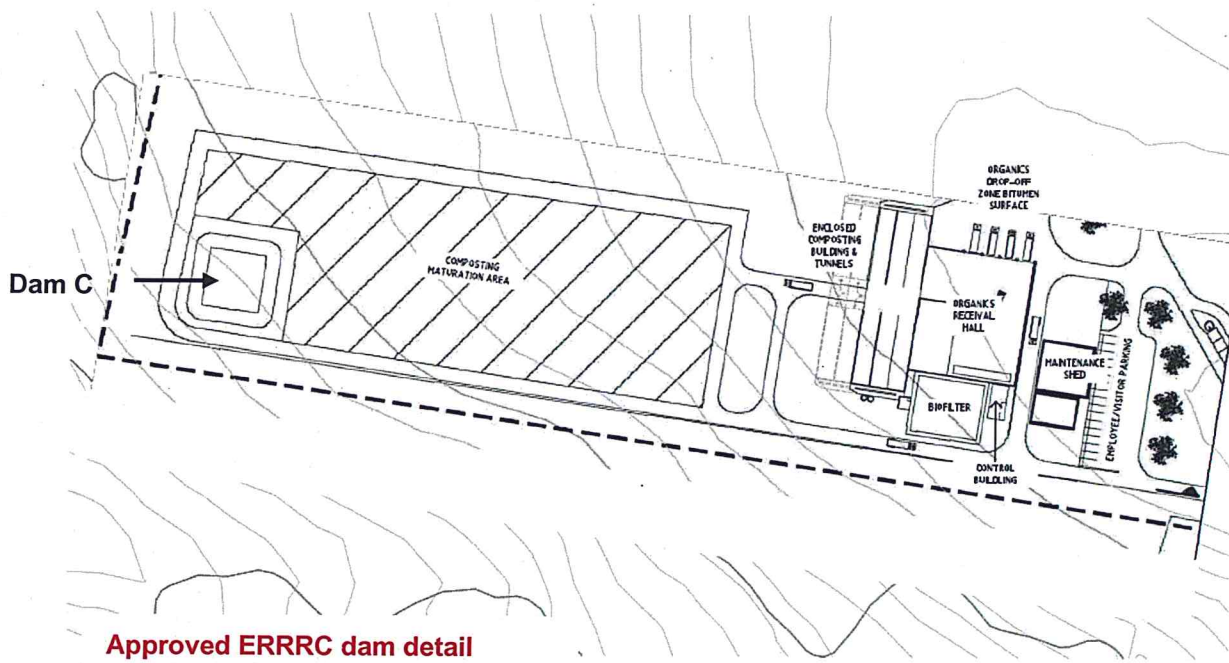


Approved site plan

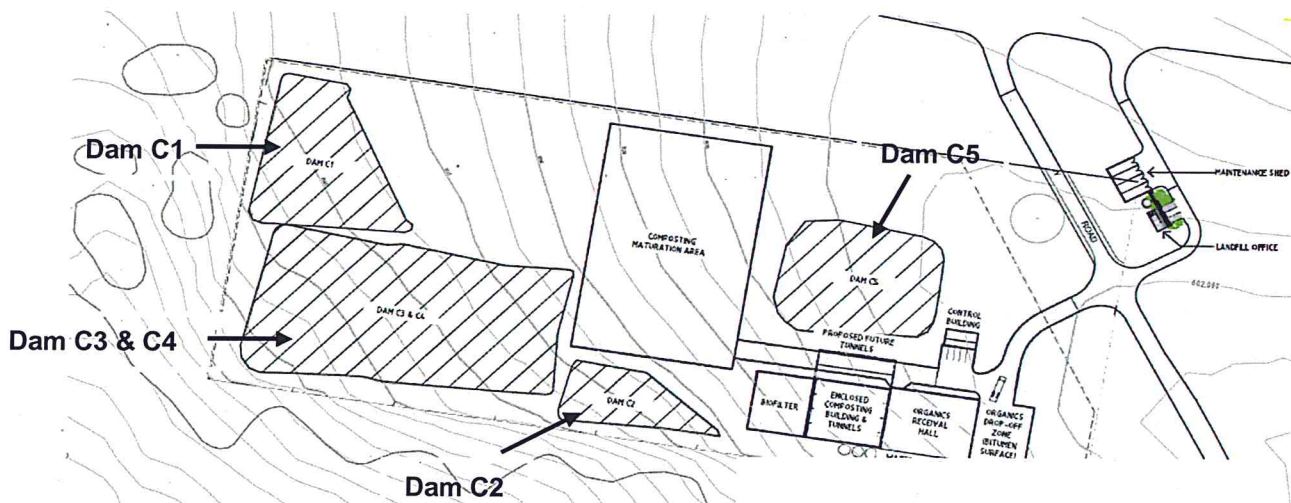


Proposed site plan

Figure 4: Approved and proposed ERRRC site layout



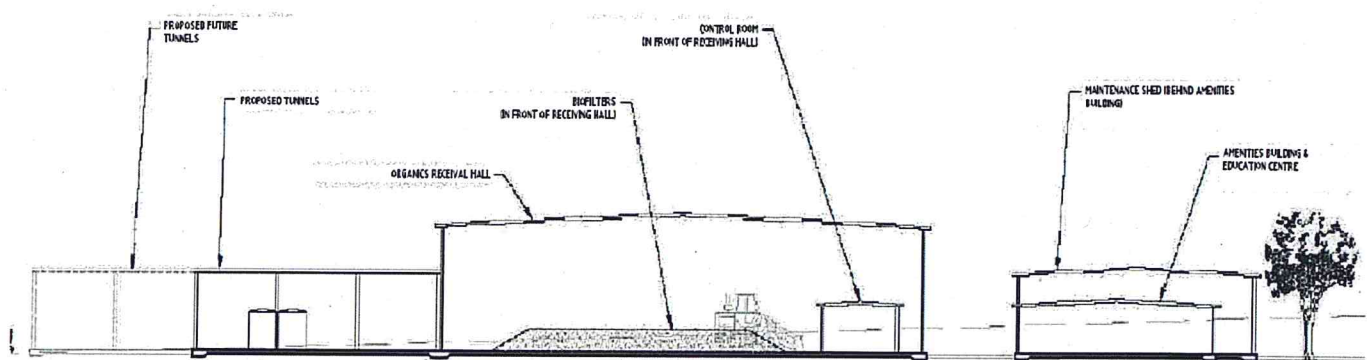
Approved ERRRC dam detail



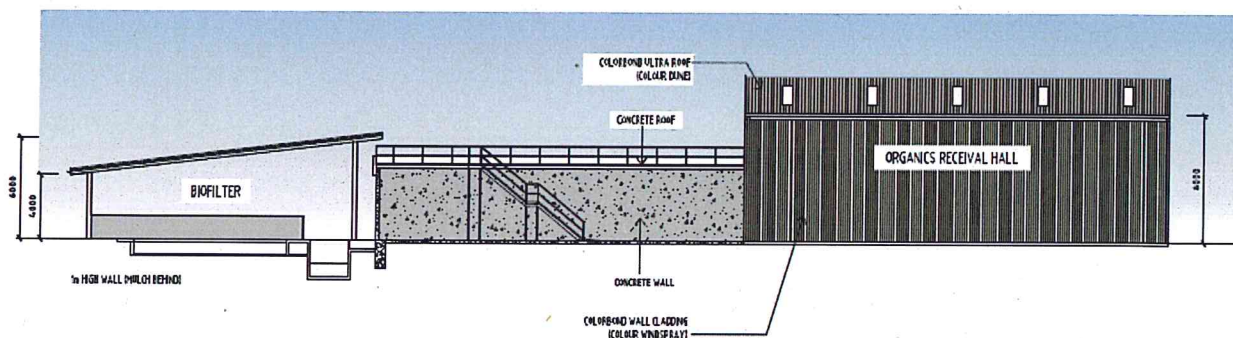
Proposed ERRRC dam detail

2 PROPOSED PART SITE PLAN

Figure 5: Approved and proposed ERRRC site dam and composting area comparison

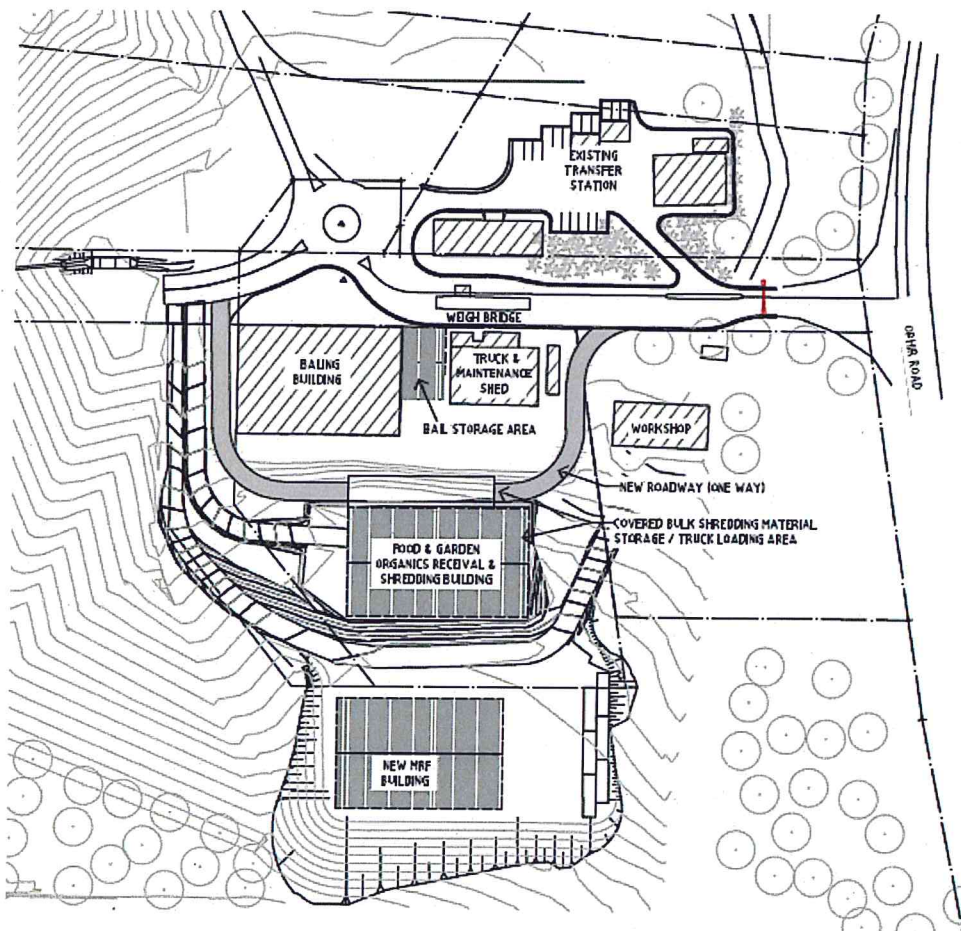


Approved ERRRC southern elevation

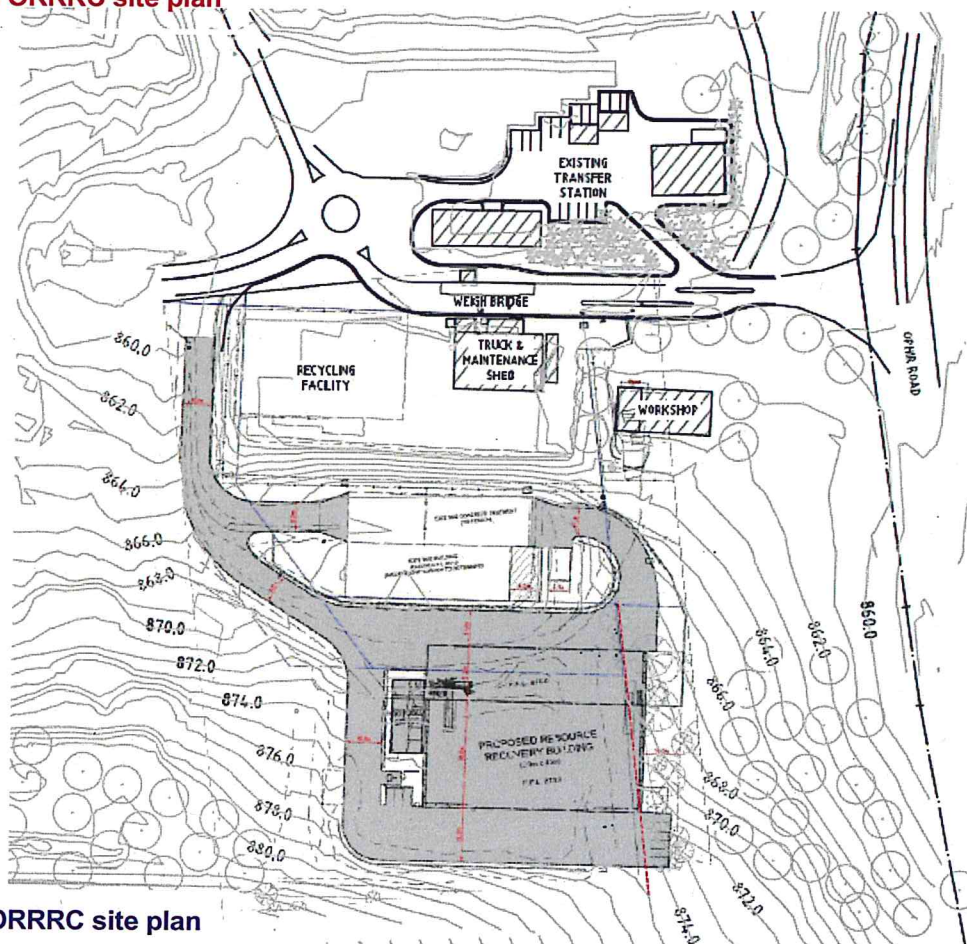


Proposed ERRRC southern elevation

Figure 6: Approved and proposed ERRRC southern elevation

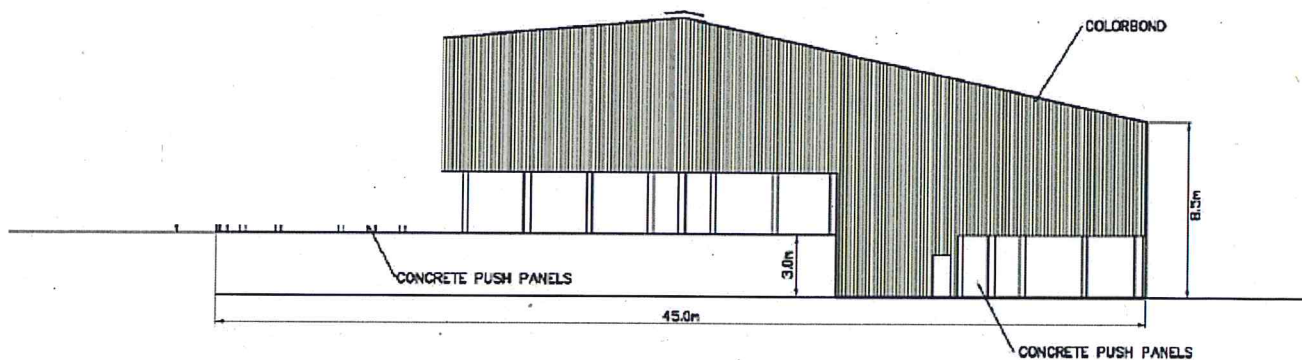


Approved ORRRC site plan

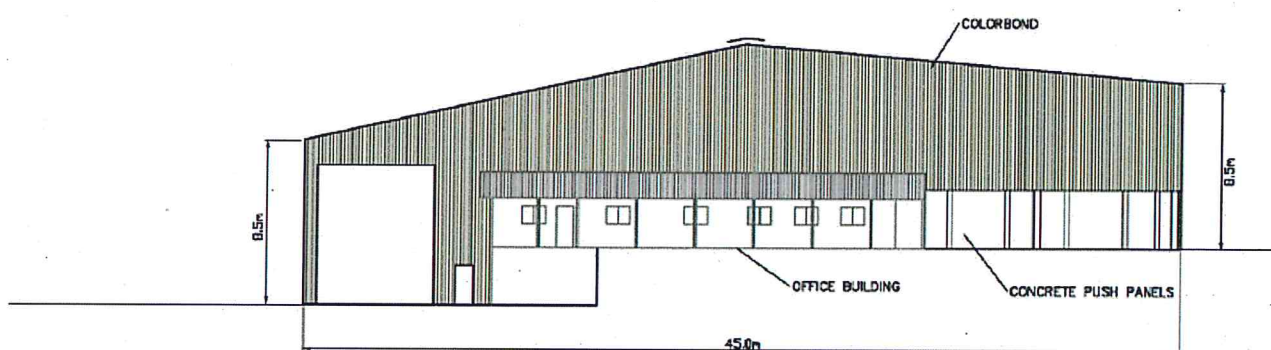


Proposed ORRRC site plan

Figure 7: Approved and proposed ORRRC site layout

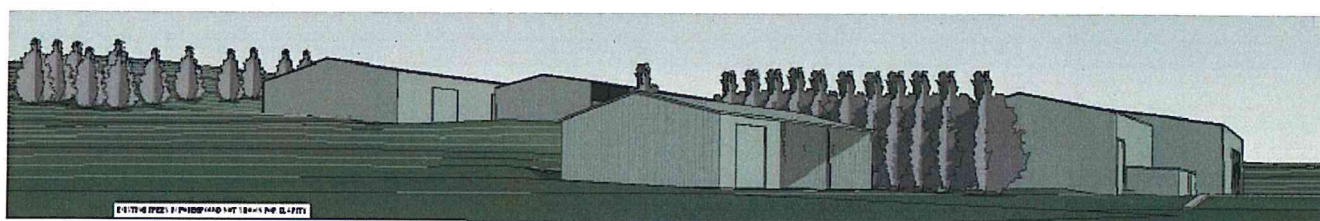


EAST ELEVATION

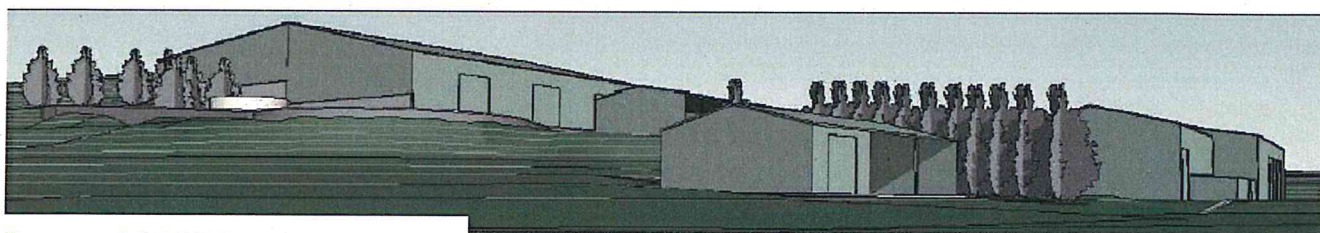


WEST ELEVATION

Figure 8: Proposed eastern and western elevations of the consolidated ORRRC resource recovery building



Approved ORRRC buildings



Proposed ORRRC buildings

Figure 9: Visual comparison (artist impression) of the existing approved and proposed ORRRC buildings

3. STATUTORY CONTEXT

Section 75W

In accordance with Clause 12 of Schedule 6A of the EP&A Act, section 75W of the Act as in force immediately before its repeal on 1 October 2011 and as modified by Schedule 6A, continues to apply to transitional Part 3A projects.

Under Section 75W of the EP&A Act, the Minister is obliged to be satisfied that what is proposed is indeed a modification of the original proposal, rather than being a new project in its own right.

The Department notes that:

- the primary function and purpose of the approved project would not change as a result of the proposed modification; and
- any potential environmental impacts would be minimal and appropriately managed through the existing or modified conditions of consent.

Therefore, it is considered that the proposed modification is within the scope of section 75W of the EP&A Act. Consequently, the Department considers that the application should be assessed and determined under Section 75W of the EP&A Act rather than requiring a new development or project application to be lodged.

Approval Authority

The Minister was the approval authority for the original project approval, and is consequently the approval authority for this application.

The Executive Director, Major Projects Assessment, may determine this application on behalf of the Minister in accordance with the Minister's delegation dated 14 September 2011, subject to the following:

- where the relevant local Council/s has not made an objection;
- where a political donations disclosure statement has not been made; and
- there are less than 25 public submissions in the nature of objections.

The Department is satisfied that the application meets the terms of the delegation and that the Executive Director may determine the application under delegated authority.

4. CONSULTATION

Under Section 75W of the EP&A Act, the Department is not required to notify or exhibit the application. However, upon receipt, the application was placed on the Department's website and following a review of the application, the Department:

- publicly exhibited the EA from **Friday 2 March 2012** until **Monday 19 March 2012** (15 days):
 - on the Department's website;
 - at the Department of Planning and Infrastructure's Sydney Office;
 - at the Department of Planning and Infrastructure's Dubbo Office;
 - at Orange City Council;
 - at Cabonne Council; and
 - at the Nature Conservation Council.
- advertised the public exhibition in the Molong Express and Orange Central Western Daily newspapers on **Thursday 1 March 2012**;
- notified relevant government authorities including Orange City Council (OCC), Cabonne Council (CC), the Environment Protection Authority (EPA), Roads and Maritime Services (RMS), Department of Trade and Investment, Regional Infrastructure and Services (DTIRIS) and the NSW Office of Water (NOW); and
- notified and sought comment from those who lodged submissions on the original application.

During the exhibition period, the Department received a total of thirteen (13) submissions on the project, including: five (5) submissions from public agencies, two (2) submissions from special interest groups and six (6) submissions from the general public.

On 14 May 2012, OCC lodged a response to submissions (RTS) report with the Department to address the issues raised in submissions. In its RTS report, OCC also outlined a number of additional changes to the design, site layout and appearance of buildings at both sites.

Due to the additional changes, relevant government authorities and submitters to the modification were provided with a further 14 days to make supplementary submissions on the revised modification.

In response, the Department received 9 supplementary submissions, which included five (5) from public agencies, two (2) from special interest groups (Hub Action Group and the Apiculture Committee) and two (2) from the general public. All supplementary submissions received on the RTS also had made submissions to the original exhibition of the modification. As such, for the purposes of this assessment, where supplementary submissions have been made by agencies and/or persons, the issues raised will be considered as one (1) consolidated submission.

A summary of the issues raised in submissions is provided below.

4.1 Agency submissions

OCC did not object to, or raise concerns with, the proposed modification.

CC did not object to the proposed modification, however, it did raise concerns regarding:

- the proposed additional water storage dams at the ERRRC site; and
- the design and alignment of the composting buildings at the ERRRC site and the potential resultant air, noise and visual impacts on nearby sensitive receivers.

Further, CC noted that OCC had lodged a development application with CC for a 2 lot subdivision of the ERRRC site and requested clarification on the interaction between such a consent and the Part 3A project approval.

The **EPA** did not object to the proposed modification. The EPA noted that the proposed changes would be primarily to road and building design and/or layout only and that the waste management strategies would remain the same. Further, the EPA considered that the proposed changes at the ERRRC site would likely result in a positive environmental impact in relation to odour, noise and water, and that OCC would be required to comply with the existing noise limits in the Environment Protection License (EPL) for the ORRRC site operations.

The **RMS** did not object to the proposed modification and noted that it would not have any traffic impacts.

The **NOW** did not object to the proposed modification, however, it requested that the Soil and Water Management Plan be prepared, in consultation with NOW, to reflect the proposed changes. The Department notes that under the existing approval, this Plan is required prior to the commencement of operations on the Euchareena site. As the Euchareena site has not commenced operations, the Department is satisfied the Soil and Water Management Plan would be prepared for the modified project.

4.2 Special Interest Groups

The **Hub Action Group** objected to the proposal, raising the following key concerns in their submission:

- the presence of a shredder and the removal of screening/bunding at the ERRRC site;
- the design and alignment of the composting buildings at the ERRRC and the potential resultant odour and noise impacts;
- the removal of the Education Centre (and public scrutiny) from the ERRRC site;
- the additional water storage dams (C1 to C5) at the ERRRC site requesting clarification on dam capacity, lining, function, water source and harvestable rights;
- whether the proposed changes could be considered as a modification; and
- the potential for the modification to increase risk to the local apiculture industry.

The **Orange Waste Project Apiculture Committee (Apiculture Committee)** made no objection to the proposed modification and noted that they are of the view that the proposed modification would not increase risk to the local apiculture industry. The Apiculture Committee noted in its meeting minutes (M12/32) that it endorsed the improved overall functionality of the proposed infrastructure modifications and agreed that there would be no additional risk proposed to apiculture management procedures already endorsed for the Orange Waste Project.

4.3 General Public

Submissions from members of the general public raised a variety of concerns, including:

- the presence of a shredder at the ERRRC site which is in conflict with the project approval;
- visual impacts including the loss of landscaping, screening bunds at the ERRRC site and the proposed change to the building colour;
- impacts on tourism and local business through the removal of the education centre from the ERRRC site;
- the design and alignment of the composting buildings at the ERRRC and the potential resultant odour and noise impacts;
- the size and location of the additional water storage dams (C1 to C5);
- the potential for the modification to increase risk to local apiculture industry; and
- the implications of OCC's development application with CC for a 2 lot subdivision of the ERRRC site.

All of the issues raised in submissions are addressed below.

5. ASSESSMENT

The Department has assessed the merits of the proposed modification. During this assessment, the Department has considered:

- the EA, RTS and Director-General's assessment report for the approved project;
- existing conditions of approval;
- all documentation supporting the proposed modification;
- all issues raised in submissions on the proposed modification;
- OCC's response to these submissions;
- relevant environmental planning instruments, policies and guidelines; and
- requirements of the EP&A Act, including the objects of the Act.

Keys issues considered as part of the assessment of the approved project application included consideration of alternative sites, resource recovery levels, justifiable demand (for the new landfill at the ERRRC), impacts on agricultural land, apiculture risks, and traffic.

In regard to the proposed modification, the Department considers soil and water, noise and air quality to be the key environmental issues associated with the proposed modification. The assessment of all other issues is outlined in Table 2 below.

5.1 Soil and Water

Issue

The proposed modification has the potential to increase the soil and water impacts of the project.

Consideration

ORRRC Site

The consolidation of the three approved process buildings at the ORRRC site into a single building would marginally decrease the total gross floor area (GFA) from 2,916m² (as approved) to 2,881.28m² - a reduction of approximately 34.75m² or 1%.

As a result of the building consolidation, together with removing the need for any demolition works, soil and water impacts from construction, including earthworks, are expected to decrease.

ERRRC Site

In regard to the ERRRC Site, the proposed modification would result in; a change to the internal road layout; the consolidation of buildings; the reconfiguration of Dam C into 5 separate dams (Dams C1 – C5); and an increase in dam storage capacity.

A number of submitters raised concerns about the plans in the original modification, which only illustrated the proposed reconfiguration of Dam C. Concerns were raised that since the plans did not show the other approved surface water dams (A and B) at the ERRRC site, that these dams could potentially have been removed from the site.

Cabonne Council and a number of public submitters (eg. the Hub Action Group) also raised concerns that the overall capacity of Dam C had increased from 0.5 to 10 mega litres (ML) which would exceed harvestable rights for the ERRRC site.

In response to these concerns, the Department requested OCC provide further clarification on the dams function, design (lining), water capacity and harvestable rights, and end use.

In its RTS report, OCC provided amended plans of the ERRRC site to show all current and proposed surface waters dams. OCC clarified that the proposed modification did not seek to change Dams A and B (located adjacent to the landfill area) which would remain in accordance with the current approval. The proposed modification would see Dam C, located in the vicinity of the composting facility at the ERRRC site, separated into five (5) separate dams (Dams C1–C5) (see Figures 4 - 5) with an increased water storage capacity.

OCC indicated that following the project's approval, detailed water balance analysis had been undertaken which concluded that the original water requirements for the ERRRC site had been under estimated (ie 0.5 ML) and that around 5 ML of water would be required for its operational activities.

Dams C1-C5 would now have a combined capacity of around 10 mega litres. OCC indicated the extra capacity in Dam C would enable the composting facility to store sufficient water for operational needs without any of the dams needing to be at 100% capacity (ie less than 10 ML). The increased capacity would also ensure that surface runoff during periods of high rainfall can be adequately accommodated, thereby preventing any uncontrolled release of liquid residue from the site into the local water environment.

Further, OCC advised that the function of Dams C1-C4 would remain unchanged for that which was approved and will serve to collect water (including stormwater) from the composting operation areas for re-use in the composting process. The function of Dams C1 and C2 would be for the capture and reuse of stormwater that has potentially been in contact with treated compost. Dam C3 would capture residual runoff from the composting process in addition to providing top up water for the compost process. Dam C4 would be kept less than 20% full and act as a back up for C3 in times of high rainfall. Dam C5 would be used as a fire fighting resource.

The dam design would remain consistent with the approval design incorporating a 900mm clay lined closed system where no discharge occurs. The compost maturation area would be bunded to prevent leachate run-off into surrounding soils.

In terms of harvestable rights, OCC has responded by suggesting that because Dams C1-C4 would serve as a pollution control function (ie collecting leachate water from the compost maturation area), the dams would be exempt from harvestable rights requirements.

The Department discussed this issue with NOW, who has confirmed that since the Dams would be used to store rainwater harvested from the roofs of the buildings and maturation area and not for capturing overland flow from clean areas, this method of collection is not considered within the harvestable rights calculations.

Conclusion

Existing conditions of approval require OCC to prepare and implement a Soil and Water Management Plan (SWMP) for the project, in consultation with Council and to the satisfaction of the Director-General. Further, additional conditions are in place to ensure that the soil and water impacts of the project are effectively managed. These include the requirement for OCC to:

- implement suitable erosion and sediment control measures on site during construction;
- prepare and implement a Construction Management Plan for the project which includes measures to minimise and manage soil and water impacts;
- ensure discharge limits comply with section 120 of the POEO Act; and
- ensure all chemicals, fuels and oils used on site are stored in appropriately bunded areas.

The NOW supported the proposal provided the Soil and Water Management Plan (SWMP) is updated to reflect the modified project. Further, the NOW advised if the catchment areas of Dam C1-C5 are bunded to restrict runoff to be only from potentially contaminated areas and the dams are used for the storage of water sourced from roof runoff then the dam capacities would not be considered under the Maximum Harvestable Rights Dam Capacity (MHRDC) for the site. Dams which capture overland runoff from clean (undisturbed) areas would need to be considered under the MHRDC.

Under the conditions of approval, OCC is required to prepare a SWMP. As the SWMP is yet to be prepared (given operations have not commenced at the Euchareena site), the SWMP would need to ensure it addresses any potential soil and water related issues relating to the modification. The SWMP is also required to be prepared in consultation with NOW and the EPA, and as such, the Department is satisfied that the SWMP would ensure soil and water related issues, including those relating to the modification, would be adequately managed.

Furthermore, the Department has also recommended additional conditions to ensure that the additional dams (C1-C5) are also constructed in a manner to include 900mm of clay lining material to manage any seepage issues.

The Department is satisfied that the existing conditions and recommended modified conditions would adequately manage any potential soil and water impacts from the project (as modified).

5.2 Noise

Issue

The proposed modification has the potential to increase the noise impacts of the project.

Consideration

Noise impacts from the approved project were considered to be conservative as the predictions were based on the use of plant and equipment not contained in a partially enclosed building. Further, noise impacts were predicted to be below the relevant noise criteria.

The proposed modification would not change the plant and equipment used at the facility, nor would it change the volume of waste permitted to be received or processed at the facility.

The consolidation of operations into one building at the ORRRC (ie. the RRB) is expected to lead to a reduction in noise during construction due to a reduction in the amount of required demolition work and the construction of a single building as opposed to three.

Given the above, noise emissions during construction and operation at both sites are expected to be less than those assessed under the original project approval.

A number of public submitters raised concern about the presence of a shredder at the ERRRC site on the original modification plans and subsequent noise impacts. Further, CC and a number of submitters (eg. the Hub Action Group) also raised concern that the proposed design (enclosed on three sides with an open end) and alignment of the organics receival building at the ERRRC site would increase noise at nearby sensitive receivers.

In response to these concerns, OCC has clarified that the shredder was shown in error on the original plans and would only be located at the ORRRC site.

In regard to the design of the organics receival building, OCC clarified that the original noise assessment modelled noise emissions based on all plant and equipment operating directly and concurrently, without the presence of an enclosed building structure. Given that the organic receival area would now be partially enclosed, OCC's acoustic experts advise that the actual noise levels would be lower than those predicted in the original EA.

Further, since the noise assessment was undertaken for the approved project, noise intensive shredding operations originally proposed at the ERRRC site have now been relocated to the ORRRC site in accordance with the conditions of approval.

OCC has confirmed that no shredding facilities are proposed at the ERRRC site. This is expected to result in further reductions in actual noise emissions at the ERRRC site compared to those predicted in the original EA.

Conclusion

Both the EPA and the Department consider that the proposed modification is expected to result in a positive environmental outcome in relation to noise.

Existing conditions of approval are in place to ensure that the noise impacts of the project are effectively controlled. These include the requirement for OCC to comply with specific noise limits and hours of operation, and implement the approved Noise Monitoring Program at the ERRRC site.

With existing conditions in place and given the conservative modelling which was undertaken assuming no enclosed building would be used, the Department is satisfied that the proposed modification would not increase noise impacts from the project.

5.3 Air Quality

Issue

The proposed modification has the potential to increase the air quality impacts of the project.

Consideration

The EA for the approved project concluded that the air quality impacts of the project would be negligible.

The proposed modification involves minor site layout changes and no change is proposed to waste operations including the volume of waste permitted to be received or processed at the facility. Therefore, the proposed modification is not expected to result in any additional air quality impacts beyond that originally approved.

The consolidation of operations into a single building (ie. the RRB) at the ORRRC is expected to result in a reduction in dust impacts during construction due to less construction and demolition works being undertaken at the site.

Cabonne Council and a number of public submitters (eg. the Hub Action Group) raised concerns that the proposed design (3 enclosed sides with an open end) and alignment of the organics receival building at the ERRRC site would increase odour impacts on nearby sensitive receivers.

In response to this concern, OCC confirmed that the original air quality assessment for the approved project was undertaken on the assumption that this building was not enclosed on any side. In this regard, OCC notes that the proposed modification is therefore not expected to have a greater impact on air quality than originally approved.

Conclusion

Both the Department and the EPA consider that the proposed modification is expected to result in a positive environmental outcome in relation to air quality at the ERRRC site.

Existing conditions of approval are in place to ensure that the air quality impacts of the project, including odour and dust, are effectively controlled. These include the requirement for OCC to:

- comply with the total suspended particle, PM₁₀ and dust deposition limits specified in the project approval;
- not cause or permit the emission of offensive odours from the site; and
- implement the approved Air Quality Monitoring Program for the project.

The Department is therefore satisfied that the air quality impacts of the proposed modification would be negligible.

5.4 Other Issues

Table 2: Assessment of other issues

Issue	Assessment	Recommendation
Apiculture risks	• The Department and a number of submitters raised concerns that an increase in the availability of water at the ERRRC site (Dams C1 - C5), may increase the attractiveness to bees thereby increasing the risk of disease and contamination to nearby apiaries. • OCC's apiaries experts, who prepared the approved Apiculture Risk Management Plan, reviewed the proposed modification and concluded that while there may be an increase in attractiveness associated with an increase in available water on site, there would also be a significant increase in dilution of contaminants effectively removing any risk to apiculture. • The Apiculture Committee reviewed the modification and agreed that there would be no significant change in the risk to apiculture from the proposed modification. • The Department is satisfied that the proposed modification would not increase risks to the local apiculture industry. Existing conditions of approval require the OCC to implement all reasonable and feasible measures to minimise the apiculture risks of the project including baling and wrapping all mixed and residual waste in plastic and using an enclosed tunnel composting facility; and implement the approved Apiculture Risk Management Plan to minimise Apiculture risks.	• Recommended conditions require OCC to: - ensure that bales are wrapped all year round in accordance with the Apiculture Risk Management Plan.
Visual	• The proposed modification would reduce the number of new buildings at the ORRRC site. However, as a result, the existing recycling facility and truck shed, would be retained. • The EA for the proposed modification included a three dimensional visual comparison of the existing approved and proposed buildings at the ORRRC site (see Figure 9). • Changes proposed at the ERRRC site are essentially a re-organisation of approved buildings that are screened from near residences by purpose built visual bunds (see Figure 4). • OCC responded to concerns regarding the visual bunds, vegetation screening at the ERRRC and building colour. OCC confirmed that bunding and screening would not change as a result of the proposed modification and submitted revised plans (see Figures 4 - 5). • Due to the existing topography of the site (sloping from south to north), existing vegetation and the distance to the nearest residential receiver (approx. 400m to the south), the proposed modification is expected to result in a negligible change to visual impact of the project (see Figure 9). • Existing conditions of approval require OCC to landscape areas around any new buildings at the ORRRC site, prior to operations commencing. Similar landscaping requirements are in place for the ERRRC site to minimise visual impacts. • The Department considers that the visual impacts of the proposed modification would be minor and has recommended a minor amendment to the approval conditions requiring the buildings to be a colour consistent with other buildings in the locality.	• Recommended conditions require OCC to: - ensure buildings are externally clad with colours that are consistent with other buildings in the locality and on site and are non-reflective.
Traffic	• The modification does not seek to alter the number of truck movements	• Recommended

Issue	Assessment	Recommendation
	into, or out of, the facility during construction and operation. - The revised internal road layouts have been modified to improve vehicular movement around both sites. - Due to the relocation of the education centre to the ORRRC, light vehicle traffic at the ERRRC is expected to be reduced by approximately 30 vehicle movements a year (eg. school buses). - Traffic is not expected to increase at the ORRRC site due to the relocation of the education centre given that education activities are currently already hosted at the ORRRC site. - OCC proposed to reduce the number of parking spaces at the ERRRC from 17 to 8 light vehicle spaces as a result of the relocation of the education building. - To meet the relevant RMS guidelines, thirteen (13) car parking spaces would be required at the ERRRC site. The OCC has committed to providing 13 spaces at the site. - CC, OCC and the RMS did not raise any further issues in relation to traffic. - The Department is satisfied that the traffic impacts of the proposed modification would be negligible.	conditions require OCC to: provide a total of 13 car parking spaces at the ERRRC site, to the satisfaction of the Director-General.
Flora and fauna	- No additional impacts on flora and fauna beyond the approved facility would occur as a result of the proposed modification. - The proposed modification would not impact on the Proponent's responsibilities to protect and enhance the remnant White Box Endangered Ecological Community at the ERRRC site. - There are existing conditions in place to ensure the flora and fauna impacts of the project are adequately managed (see recommendation). - The EPA did not raise any issues in regard to flora and fauna. - The Department is satisfied that the flora and fauna impacts of the proposed modification would be negligible.	Manage through existing conditions of approval.
Cultural heritage	- No known items or areas of heritage (including Aboriginal) significance would be impacted by the proposed modification. - The existing approval details the Proponent's obligation to protect and conserve Aboriginal artifacts found in the south-western corner of the ERRRC site. This will not change. - Further, there are existing conditions in place to deal with any unexpected isolated artifact finds/deposits (see recommendation). - The EPA did not raise any issues in regard to heritage. - The Department is satisfied that the proposed modification would not result in any heritage impacts beyond this already assessed.	Manage through existing conditions of approval.
Approval interaction with other consents	- The OCC recently lodged a development application with CC for the subdivision of the ERRR site separating the composting facility from the other components of the ERRRC site. - Concerns were raised by CC and a number of submitters that OCC may not fulfill its commitment to oversee the on-going environmental monitoring and management of the site. - In response to these concerns OCC clarified that the need for the subdivision is to: - simplify EPA licensing by allowing 2 separate EPLs to be issued at the site, one to OCC for the landfill operations and one to a waste contractor for the composting operations; and - simplify internal site management and leasing arrangements at the site. - OCC has confirmed that regardless of the subdivision, the site would remain in their ownership and management. Therefore, the responsibility of ensuring environmental compliance with the project approval would also remain with OCC. - The Department is satisfied that suitable provisions are in place under the EP&A Act to ensure that the management requirements detailed in the project approval would not be effected by any consent issued by CC.	N/A

Based on the above assessment, the Department is satisfied the proposed modification would result in minimal environmental impacts beyond those issues identified and managed through the original project approval.

6. CONCLUSION

The Department has assessed the proposed modification in accordance with the requirements of clause 8B of the Regulations. This assessment has found that the proposed modification would:

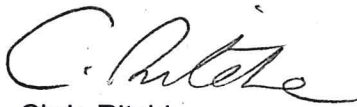
- result in minimal environmental impacts beyond the approved facility;
- allow new buildings to be constructed at the ORRRC site with minimal disruption to the existing waste operations;
- allow OCC to separate Council operated facilities from the recycling and composting elements operated by waste contractors;
- result in a reduction in required construction and demolition works;
- improve the operational efficiency of the facility; and
- improve internal vehicular movement at both sites.

Consequently, the Department is satisfied that the modification should be approved.

7. RECOMMENDATION

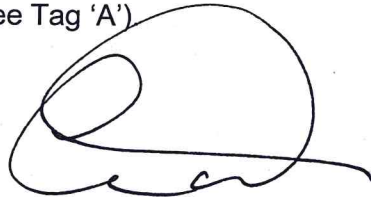
It is RECOMMENDED that the Executive Director, Major Project Assessment:

- **consider** the findings and recommendations of this report;
- **determine** that the proposed modification is within the scope of section 75W of the EP&A Act;
- **approve** the application subject to conditions; and
- **sign** the attached notice of modification (see Tag 'A')



Chris Ritchie
Manager - Industry
Mining and Industry Projects

7/8/12



Chris Wilson
Executive Director
Major Projects Assessment

7.8.12