

DOC18/962553

Mr Bruce Zhang
Environmental Assessment Officer
Department of Planning and Environment
PO Box 39
SYDNEY NSW 2001

14 December 2018

Dear Mr Zhang

**Woodlawn Resource Recovery Facility (MP 06_0239 MOD 2 and MP 10_0012 MOD 3)
Modification – Final comments and recommended conditions of consent**

I am writing in response to your email to the Environment Protection Authority (EPA), dated 10 December 2018, seeking the EPA's final comments and recommended conditions of consent for Veolia Environmental Services (Australia) Pty Ltd's application to modify Woodlawn development approvals MP 06_0239 and MP 10_0012. Veolia is seeking to modify the approvals to permit the construction and operation of Solid Recovered Fuel (SRF) facility at the premises and the transport of SRF product to Port Botany.

We have reviewed Veolia's Response to Submissions document dated 16 November 2018 and are satisfied that it addresses the concerns raised in our letters to the Department dated 16 August 2018 and 17 October 2017.

Should the modification be approved, the EPA recommends that a number of new conditions be included in the modified project approvals, as detailed below.

Air Quality

1. Trucks transporting waste to and from the SRF facility must be covered at all times, except for when they are loading or unloading.
2. The SRF facility must be designed and constructed so as not to preclude the retrofit of odour controls to the processing building and dryer exhaust.
3. SRF processing is limited to an input of 50,000 tonnes per annum of residual waste from the MBT facility.
4. The Applicant must carry out an Air Quality and Odour Audit of the SRF facility within 3 months of the commencement of operations. The audit must:
 - a) Be carried out by a suitably qualified and experienced expert;
 - b) Validate the emissions from the facility against air quality and odour predictions made in the modification application;

- c) Assess particulate matter emissions from the dryer exhaust against limits set out in the Protection of the Environment Operations (Clean Air) Regulation 2010.
 - d) Review design and management practices of the facility against industry best practice for air emissions and odour management; and
 - e) Assess the need for any additional mitigation measures based on the findings of the audit and provide recommendations for their implementation.
5. Within 6 weeks of the completion of an Air Quality and Odour Audit, the Proponent shall submit a copy of the audit report to both the EPA and the Department with a response to any recommendations contained in the audit report.
 6. The proponent must ensure that all SRF product is stored in a manner that maintains it in a dry state. If stored outside the processing building, storage must prevent water ingress.
 7. SRF product must not be used as a fuel on the premises.

Waste Receipt and Vehicle Flow Control Plan

The EPA notes that the Proponent intends to utilise the existing entrance and weighbridge facilities for the Woodlawn Bioreactor (Environment Protection Licence 14436) to receive and record waste destined for the proposed SRF facility.

The Protection of the Environment (Operations) Act 1997 and the Protection of the Environment Operations (Waste) Regulation 2014 set out specific requirements for recording waste received at waste facilities. Whilst it may be possible to meet these requirements using a single weighbridge for both the Bioreactor and the proposed SRF facility, the exact details of how this will be achieved are unclear.

Should the proposed modifications be approved, it is recommended that the following condition be included in the modified approvals:

1. The Proponent must prepare and implement a Waste Receipt and Vehicle Flow Control Plan to the satisfaction of the EPA. This plan must be submitted to the EPA for approval prior to construction of the SRF facility, and include details of the infrastructure, and the systems and procedures, that will be used to ensure compliance with the requirements of Section 88 of the Protection of the Environment Operations Act 1997 and Part 3 of the Protection of the Environment (Waste) Regulation 2014. The plan must also show all vehicle entry and exit points, including emergency exits, where waste is transported into, out of, and between (a) the SRF facility and (b) the adjoining Woodlawn Mechanical Biological Treatment facility and (c) the Woodlawn Bioreactor facility.

If you have any questions or would like to further discuss this matter, please contact Nick Feneley on (02) 4224 4144.

Yours sincerely



MEGAN WHELAN
Unit Head Waste Compliance
Environment Protection Authority