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Dear Ellen

**EPA advice on Environmental Impact Statement - Yennora Liquid Waste Treatment Plant (SSD-10407)**

The NSW Environment Protection Authority ("EPA") received a request for advice from the Department of Environment, Industry and Planning ("DPE") in relation to the Environmental Impact Statement ("EIS") submitted for a proposed expansion of the Enviro Waste Services Group Pty Ltd ("EWS") Yennora liquid waste treatment facility (SSD-10407) on 12 November 2020.

EWS is proposing to increase its waste processing quantity to 110,000 tonnes per annum and increase the maximum quantity of waste to be stored at any one time to 477 tonnes; specifically:

- processing 100,000 tonnes per annum and storing 377 tonnes at any given time of liquid waste at the existing facility at 14 Kiara Crescent; and
- processing 10,000 tonnes per annum and storing 100 tonnes of out-of-date liquid product/food waste at a new facility at 16 Kiara Crescent.

The proposed increase in capacity would also require 24/7 operations.

The EPA has reviewed the EIS for the proposed expansion of the EWS Yennora liquid waste treatment facility by Benbow Environmental dated 3 November 2020 and advises that there are matters that must be addressed before General Terms of Approval can be issued. The matters specifically relate to the assessment of odours and management of waste transport vehicles.

Detailed comments are provided below.

**1. Odour Impact Assessment**

The Odour Impact Assessment 3 November 2019 ("the OIA") does not provide adequate justification that the existing plant, including the biotrickling filter, the solids filter and the DAF, can handle the increased throughput. The proposed additional facility has not been included in the quantitative odour assessment and the OIA has not adequately justified its exclusion.

Considering the operational variability of the potential waste streams and volumes received, the OIA has not presented a justified worse-case scenario to evaluate potential impacts. Considering the uncertainties with regards to odour modelling and impacts, the OIA has not considered the odour risk of the proposal and what additional mitigation and control measures could be implemented should odour impacts occur once the facility becomes operational.

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### **Justification of capability for increased capacity not provided**

The proposal seeks to increase annual throughput from 900 tonnes to 100,000 tonnes without any change to plant. The proposed increase in the storage will be addressed through a modification to the storage tanks. The OIA has not demonstrated the capacity of the plant being able to handle the greater than 100x throughput increase in liquid waste while controlling any odours.

The OIA identifies three odour sources, the solids filter, the biotrickling filter and the Dissolved Air Flotation (DAF) plant, but does not provide adequate justification that they have the capacity to handle the proposed increase in throughput. The OIA should include, as a minimum, the design capacity of each, the current average and maximum throughput (daily/hourly) and the potential maximum throughput (daily/hourly) for each part of plant. Consideration to operational variability and maximum rates should be given in the justification.

**The EPA requests EWS provide adequate justification that the existing plant (inclusive of the biotrickling filter, the solids filter and the DAF) is capable in handling the increased throughput of liquid waste including reference to current throughput rates and times, control efficiency and plant design capacity.**

### **Justification of exclusion of odour sources from quantitative assessment not adequately justified**

The quantitative OIA has not included the proposed activities at 16 Kiora Crescent, which include the receipt, processing and storage of 10,000 tonnes per annum of waste including out-of-date food waste, in the assessment of odour.

The OIA justifies exclusion of these activities from the quantitative assessment by stating that the minor odours from 16 Kiora Crescent are negligible and are not offensive. However, this justification has only been informed by some of the proposed waste materials to be received (fruit juice and soft drinks) and has not given consideration to other proposed materials such as large quantities of out-of-date dairy products or other food wastes. The EPA considers that exclusion of these odour sources from the quantitative assessment has not been adequately justified.

**The EPA requests that EWS provide an adequate justification for exclusion of these activities from the quantitative odour assessment, and justification that the odour risk from these activities is low. In considering this comment, consideration could be given to:**

- **Odour emission rates from the existing or similar facilities with similar waste streams**
- **The controls implemented to manage odour emissions from these activities, to reduce risk of significant odour emissions from the activities**

**Where an adequate justification cannot be provided, then the EPA requests EWS include 16 Kiora Crescent in the odour assessment, particularly when determining an appropriate worst-case scenario and operational variability (waste type and receipt volume).**

### **Worst-case scenario**

The odour assessment scenario presented includes the biotrickling filter and the building (consisting of DAF and solids filter) as the odour sources. The odour emission rates for both sources have been based on sampling of one source of cooking oil at a similar facility and may not be adequately representative of the proposed operations. The proposal seeks to receive and process a range of wastes and daily and/or hourly operations are likely. A worst-case scenario should be included that considers the variability in the waste received and considers maximum daily operations and justifies that the odour concentration used is conservative and representative.

**The EPA requests EWS revise the OIA to include a justified worst-case scenario that considers operational variability and various waste products proposed to be received and processed.**

### **Odour risk assessment**

There is significant uncertainty regarding the robustness of the odour assessment due to non site-specific and limited odour measurements used in the assessment, lack of clear justification of throughput capacity for processes and controls, and a lack of clarity pertaining to operational variability (waste type and receipt volume). Additionally, the OIA has not identified additional feasible odour mitigation measures that could be implemented should odour impacts occur once the facility is operational.

The *Technical framework – Assessment and management of odour from stationary sources in NSW* lists in Section 6.2 the information to be included in odour impact assessments and includes such information that informs the odour risk of an activity. This includes additional feasible measures that could be implemented if the facility emits offensive odour after it is operational.

The EPA will use this information, together with the results of the odour assessment, to evaluate the risk of impact associated with the activity. This information will be used to develop conditions of approval or licence conditions for the activity. It will also indicate to the EPA the proponents' level of understanding regarding the odour risk of their activity and their obligation to comply with section 129 of the *Protection of the Environment Operations Act 1997*.

**The EPA requests EWS evaluates the odour risk of the project and identifies additional feasible odour mitigation measures that could be implemented if required should odour impacts occur once the facility becomes operational.**

### **2. Waste transport vehicle movements and maintenance**

EWS state there are four (4) spaces for trucks to park onsite, including at the rear of 16 Kiora Crescent and inside the buildings. The Traffic Assessment for the proposal dated July 2020 advises that there is opportunity to use unlimited street parking on both sides of Kiora Crescent and Norrie Street.

As previously advised by the EPA's SEARS response in regard to the proposal dated 1 April 2020, the EPA is not supportive of a proposal that involves waste transport vehicles parking outside of the facility.

**The EPA requests EWS provides confirmation as to whether it intends to utilise public parking for waste transport vehicle queuing or parking.**

The Traffic Assessment estimates that the expansion would result in 3 trucks movements per hour; 2 trucks arriving and 1 departing in the AM peak hour and 1 truck arriving and 2 departing in the PM peak hour. The estimation relies on truck movements being spaced out throughout a 24-hour period.

**The EPA requests EWS provide a traffic control plan that ensures truck movements are evenly spaced out throughout a 24-hour period to prevent excess truck queuing outside the facility during peak periods.**

The EIS states that a site at 49-53 Pine Road, Yennora NSW is intended to be used as a parking facility for trucks associated with the proposal. The EPA requests that EWS clarify what activities will be undertaken at the premises, in particular whether vehicle servicing, maintenance, and truck washing and removing residual waste from tankers. Such activities can pose a pollution risk to waters if adequate controls are not put in place.

The EPA notes that that 49-53 Pine Road, Yennora is located next to Prospect Creek. EWS holds an environment protection licence ("EPL") for the transport of category 1 and category 2 trackable wastes (no 13039), the EPA regulates the maintenance of waste transport vehicles against standard licence operating conditions.

If EWS intends to use 49-53 Pine Road as a truck depot, the EPA requests EWS confirm where maintenance of its waste transport vehicles associated with the proposal will taking place and whether that premises has lawful approval and environmental controls in place to service waste transport trucks.

Please contact me if you have any questions.

Yours sincerely

*William Dove 08.12.2020*

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