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Electronic Mail
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Attention: Sheelagh Laguna

EPA Advice on SEARS Request - Eastern Creek REP Throughput Increase (SSD-11606719)

Dear Ms Laguna

I refer to your request for advice from Public Authority Consultation PAE-11604656, requesting input from the NSW Environment Protection Authority (EPA) into the Secretary's Environmental Assessment Requirements (SEARs) for the proposed Eastern Creek Recycling Ecology Park (REP) Throughput Increase (SSD 11606719) at 1 Kangaroo Avenue, Eastern Creek NSW 2766 (Premises).

The EPA has reviewed the following document:

- EASTERN CREEK RECYCLING ECOLOGY PARK EXPANSION SSD Scoping Report (Revision B) - Sean Fishwick – 27.11.2020

The EPA understands the proposal seeks to increase the amount of materials received at Eastern Creek REP from 2 million tonnes per annum (Mtpa) to 3.5 Mtpa. To accommodate this, the application proposes:

- installation of a new entry and exit weighbridges and associated control offices
- internal road network upgrades and associated water management infrastructure (where required)
- provision of new site entry and egress points
- establishment of a staff car parking area

The EPA understands that the proposal does not intend to change the current operating conditions. Based on the information provided, Eastern Creek REP proposes to continue to operate within conditions of its existing environment protection licences (EPL) 20121 and 13426. EPL 20121 currently permits 667 000 tonnes of material at any one time and this includes finished product.

The EPA considers the increased throughput has the potential to adversely impact the environment and public health particularly with air emissions, and in this regard we draw your attention to the proximity of the Premises to residential areas in nearby Minchinbury and the adjacent commercial warehouse facilities. These impacts must be appropriately assessed and managed. The scoping report appropriately commits to further assessment of these impacts and

for inclusion in the Environmental Impact Statement (EIS). The EPA requests that the EIS include the following information and details:

1. **Matters to be addressed in addition to standard environmental assessment guidelines**

The EPA expects licensed facilities to implement best practice for the management of waste facilities in NSW to eliminate adverse impacts on the community and environment. Current best practice for waste processing facilities is to operate to a standard with an equivalent level of environmental control that can be achieved from operating within an enclosed building; this includes all waste handling activities, such as receival, sorting, processing, sampling, quarantine, storage and loading and storage of finished products.

In addition, external haulage areas or roads must be managed to achieve equivalent environmental controls as can be achieved by sealed hardstand. Any unused external surfaces must be managed to achieve equivalent environmental controls that can be provided by sealed hardstand or vegetation.

2. Standard Environmental Guidelines to be followed

The EPA agrees with the need for further assessment/studies to manage the environmental impacts of the Proposal. The EPA requires the Environmental Impact Statement (EIS) to address, but not limited to, the following:

A. Air Quality Impacts

As recently as September 2020, odour and dust complaints have been made by impacted residents and businesses relating to current operations at Eastern Creek REP. With an increase of material received, it is crucial to effectively manage any air impacts.

From the scoping report, the EPA notes that '[a] detailed air quality impact assessment will be carried out as part of the EIS to evaluate the impact of emissions of key pollutants during both construction and operation of the Proposal'.

The EIS should include a detailed Air Quality Impact Assessment (AQIA) for construction and operation of the project in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW. The AQIA should:

- demonstrate how the development will comply with the relevant regulatory framework specifically, the POEO Act and the POEO (Clean Air) Regulation (2010)
- include a cumulative local and regional air quality impact assessment, including odour.

The EIS should also include how risks of air pollution will be managed and monitored during the operations and construction stages to meet best practice performance expectations and avoid off-site impacts.

Technical standards and guidelines related to air are linked as follows:

- **Approved Methods for the Modelling and Assessment of Air Pollutants in NSW** (EPA, 2017)
- **Approved Methods for the Sampling and Analysis of Air Pollutants in NSW** (DEC, 2007)
- **Technical Framework – Assessment and Management of Odour from Stationary Sources in NSW** (DEC, 2006)
- **Generic Guidance and Optimum Model Settings for the CALPUFF Modelling System for Inclusion into the 'Approved Methods for the Modelling and Assessments of Air Pollutants in NSW, Australia** (OEH, 2011)
- **Ground-level ozone impact assessment framework** (EPA, 2015)

B. Water Quality Impacts

Managing water quality impacts is essential to prevent erosion and water pollution. The scoping report commits to '[a]n assessment of the potential impacts of the Proposal on water quality and hydrology during construction and operation.'

The assessment should demonstrate that all practical options to avoid discharge have been investigated and measures taken to reduce the level of contaminants in the discharge, so that any impact is reduced where a discharge is necessary.

Applicants must:

- identify and estimate the quality and quantity of all pollutants that may be introduced into the water cycle by source and discharge point
- describe the nature and degree of impact that any discharge(s) will have on the receiving environment. This includes consideration of all pollutants that pose a risk of non-trivial harm to human health and the environment (this should also include intercepted saline groundwater or acidic runoff generated by acid sulphate soil where appropriate).
- demonstrate assessment against the ambient NSW Water Quality Objectives and environmental values for the receiving waters relevant to construction and operating activity. This includes the indicators and associated trigger values or criteria for the identified environmental values.
- assess the significance of any identified impacts, including consideration of the relevant environmental values and ambient water quality outcomes. Assessment of discharges to surface waters should be guided by the ANZECC guidelines, using local Water Quality Objectives.

Technical standards and guidelines related to water are linked as follows:

- **Approved Methods for the Sampling and Analysis of Water Pollutants in NSW** (DEC, 2004)
- **Australian and New Zealand Guidelines for Fresh and Marine Water Quality** (Australian and New Zealand Governments and Australian State and territory governments, 2019)
- **NSW Water Quality and River Flow Objectives** (DEC, 2006)
- **Using the ANZECC Guidelines and Water Quality Objectives in NSW** (DEC, 2006)
- **Managing Urban Stormwater Volumes 1 and 2** (Landcom, 2004)
- **Environmental Guidelines for use of effluent by irrigation** (DEC, 2004)
- **Storing and Handling Liquids: Environmental Protection** (EPA, 2019)

C. Noise & Vibration Impacts

The impact of noise and vibration must be managed to protect the amenity and wellbeing of the community. Potential impacts should be minimised through the implementation of all feasible and reasonable mitigation measures.

The scoping report commits to '[a] detailed noise and vibration assessment … undertaken as part of the EIS to determine the potential impacts of the Proposal on the surrounding sensitive receivers, for both construction and operation.'

Technical standards and guidelines related to noise and vibration are linked as follows:

- **Noise Policy for Industry** (NSW, 2017)
- **Interim Construction Noise Guideline** (NSW, 2017)
- **ANZEC Guideline for Blasting** (ANZEC, 1990)
- **Assessing Vibration: A Technical Guide** (DEC, 2006)

- **Rail Noise Infrastructure Noise Guidelines** (EPA, 2013)
- **Road Noise Policy and Application Notes** (DECCW, 2011)

D.Waste Generation and Management

Different assessment requirements apply based on the type of facility (that is landfills, alternative waste treatment plants, liquid waste treatment plants, waste recovery facilities, building demolition waste processing yards, scrap metal yards, waste processing, waste fuel production, energy recovery facilities and in the context of Resource Recovery Orders and Exemptions). The waste transported, generated, or received as part of carrying out the activity should be minimised and managed in a way that protects all environmental values.

Technical standards and guidelines related to waste management are linked as follows:

- Waste guidelines and resources about legislation can be found at **Waste Avoidance and Resource Recovery Strategy and Waste regulations in NSW**
- **EPA's Waste Classification Guidelines** (EPA, 2014)
- **Environmental Guidelines: Solid Waste Landfills** (EPA, 2016)
- **Environmental Guidelines: Use and Disposal of Biosolids Products** (EPA, 1997)
- **Environmental Guidelines: Composting and Related Organics Processing Facilities** (DEC, 2004)
- **NSW Energy from Waste Policy Statement** (EPA, 2015)
- **Standards for managing construction waste in NSW** (EPA, 2019)

If you have any questions about this request, please contact Rashad Danoun on 9995 6370 or via email rashad.danoun@epa.nsw.gov.au.

Yours sincerely

LARA BARRINGTON
Unit Head – Regulatory Operations Metropolitan West