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Amended Advice Regarding the Air Quality Impact Assessment Report for Bettergrow Resource Recovery Facility Weatherill Park

Dear Ms Bianca Thornton

Thank you for providing the clarification regarding the NSW Environment Protection Authority (EPA) response to the submissions report for the Bettergrow Resource Recovery Facility Wetherill Park (Application SSD 7401- Mod-1) at 24 Davis Road Wetherill Park on land described as Lot 18 DP249417.

The EPA has reviewed the following documents:

- BETTERGROW WETHERILL PARK - Modification of the Bettergrow Resource Recovery and Recycling Facility - Response to Submissions - SSD 7401 – MOD1.
- Air Quality Impact Assessment, Prepared by Advanced Environmental Dynamics Pty Ltd, 15 September 2020.
- Additional Air Quality Information prepared by Advanced Environmental Dynamics Pty Ltd, 2 December 2020.

The EPA understands the proposed new limits for each waste stream and the proposed wastes to be received include:

- 100,000 tonnes per year of hydro-excavation drilling muds and fluids for storage, separation and consolidation (**being a 40,000tpa increase above currently approved levels**)
- 150,000 tonnes per year of General Solid Waste, including VENM, ENM, soils, gravels, aggregates, street sweepings, clean timber, asphalt waste, cured concrete, rail ballast, and C&D waste (**this is a new waste stream for processing**)
- 70,000 tonnes of Garden Organics (GO) and Mixed Food and Garden Organics (FOGO) (**no change to approved levels**) 30,000 tonnes of Food Organics (**no change to approved levels**).

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Conditions of Approval

Based on the information provided in the Air Quality Impact Assessment (AQIA) and the Additional Air Quality Information, on 1 February 2021 the EPA recommended the following condition of approval:

The site is limited to processing a maximum of 497.5 tonnes per day.

The proponent responded on 15 February 2021 clarifying the modelling scenario in the AQIA:

*The reference to 497.5 t/day was for the **bulk material only** and was used for the dust assessment and that it did not include any of the other waste streams including FOGO, mud, C&D. Only those waste streams that were assessed as potentially being associated with the generation of dust. Other waste streams were considered “sufficiently wet” based on the project information provided.*

The EPA recommended the condition based on the presented modelling scenario in the AQIA of a peak scenario of 497.5 tonnes/day of bulk material. No qualitative assessment of emissions from other waste streams was provided to clearly interpret the modelling scenario.

The handling of the bulk landscaping materials was identified as the highest risk of dust emissions in the AQIA. The peak emissions scenario equates to ~180,000 tpa material assessed, 4.5 times the proposed throughput of bulk landscaping supplies (40,000 tpa).

Amended advice

Based on the information provided the EPA considers the risk of dust from the operations is likely to be low. The EPA also notes that the proposed handling will be conducted within an enclosed building. Based on this the EPA amends its advice and now considers the processing limit condition not necessary as it's not reflective of the proposed operations.

If you have any further questions, please contact Luke Davison on 02 6659 8250 or via email at north.coast@epa.nsw.gov.au

Yours sincerely

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