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Dear Emma

Moss Vale Plastics Recycling and Reprocessing Facility - Environmental Impact Statement

WaterNSW appreciates the opportunity to review the Environmental Impact Statement (EIS) for the proposed Moss Vale Plastics Recycling and Reprocessing Facility proposal.

As the development is located within the Sydney Drinking Water Catchment, clauses 9(1), 9(2) and 10(1) of the *State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011* (Now Chapter 8 of the *State Environmental Planning Policy (Biodiversity and Conservation) 2021*) (the SEPP) apply.

WaterNSW has reviewed the Environmental Impact Statement prepared by GHD Pty Ltd (dated January 2022), focusing mainly on Technical Report 10 – Soils and Water and Technical Report 11 – Water and Wastewater Modelling. WaterNSW has also assessed the MUSIC stormwater quality modelling undertaken to demonstrate a Neutral or Beneficial Effect on Water Quality (NorBE).

WaterNSW has the following comments for consideration and requests that these comments be addressed in the response to submissions report:

Wastewater management and associated modelling

The Technical Report 11 – Water and Wastewater Modelling states that:

- Moss Vale wastewater treatment plant (WWTP) is at full capacity by 2021 and upgrade of the STP is planned in 25/26, and
- the estimated wastewater flow from the facility represents 0.8% of the current capacity of the WWTP and therefore is going have an insignificant impact on the WWTP.

However, the main EIS report, Section 10.4.5 states "If required, wastewater flows from the proposed facility can be stored onsite for up to 24 hours. The wastewater can be discharged overnight when there are lower flows in the wastewater system." Water NSW requests the following details:

1. If Wingecarribee Shire Council identifies/assesses that the Moss Vale WWTP cannot accept additional wastewater load from the facility, what are the alternative options for wastewater management generated by the proposed facility.
2. If the overnight storage of wastewater is required on site, how and where the wastewater will be stored on the site and any associated impacts on water quality.

Stormwater management and water quality assessment:

- MUSIC modelling and stormwater treatment:
 - Existing pond/dam in the north-eastern corner of the property should be considered in “pre” modelling scenario for NorBE assessment. Some portion of eastern side of the adjoining property drains to this pond/dam and needs to be considered in the model. When these changes are implemented in the model, NorBE may not be met.
 - Location of western bioswale is directly adjacent to the second order watercourse, which is at risk of inundation (based on the EIS flooding study). Therefore, a bioswale maybe not be suitable for stormwater treatment at this location and alternatives need to be considered.
 - The proposed bioretention basin's hydraulic conductivity is set to 200 mm/h in the model however WaterNSW's Current Recommended Practices require this to be set as 100 mm/h, considering hydraulic conductivity of the filter media decreases over time. When hydraulic conductivity of filter media was adjusted, the model does not meet NorBE.
 - High flow bypass should be set 50% of the 1- year ARI.
- Details of consultation with the neighbouring property on the eastern side need to be provided regarding proposed changes to existing dam and stormwater drainage.
- More details are required for operational maintenance of the proposed stormwater treatment measures. This is to ensure a stormwater device like the large bioretention basin (filter area 500 m²) can function as designed.
- Erosion and sediment control measures must be detailed to manage the disturbance associated with large site clearing, changes to a dam which overlaps into the adjoining property and construction works near waterways.

WaterNSW requests the following documents are prepared in consultation with WaterNSW to address the stormwater management issues:

- A detailed stormwater drainage plan for long-term sustainable stormwater management. This requires reconsideration of the stormwater treatment elements and a rerun of MUSIC stormwater quality modelling to demonstrate NorBE.
- Monitoring, management, and maintenance measures of the proposed stormwater treatment train as a part of the Operational Environmental Management Plan (OEMP).
- A detailed Soil and Water Management Plan must be developed prior to construction, dealing with erosion and sediment control. It is to be prepared in accordance with Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom,2005).

Water NSW also requests to remain as a stakeholder in any further assessment and consultation on this project.

If you wish to discuss further, please contact Ravi Sundaram or Juri Jung via email at environmental.assessments@waternsw.com.au

Yours sincerely



DARYL GILCHRIST
a/ Manager Catchment Protection