



DOC23/428419

DEPARTMENT OF PLANNING AND ENVIRONMENT

ABN 20 770 070 468

Via the Major Projects Planning Portal and via e-mail to [Tom.Burns@dpie.nsw.gov.au](mailto:Tom.Burns@dpie.nsw.gov.au)

Attention: Mr Tom Burns

### **Enviroking Liquid Waste Facility – MP07\_0048 - MOD 3 Processing Limit Increase, Advice on Modification Report**

Dear Mr Burns

Thank you for consulting with the Environment Protection Authority (the EPA) about the Modification Application and Report for the Enviroking Liquid Waste Facility MOD 3 – Processing limit increase (MP07\_0048-MOD-3). The application relates to the Enviroking Liquid Waste Facility (Enviroking) located at 843 John Renshaw Drive, Black Hill (the Premises). The Department of Planning provided certain documents associated with MOD 3 for the EPA's review (the Review Documents).

The EPA understands the modification proposal is for:

- Condition 6(a) of Schedule 2 of the Development Consent to increase the quantity to be processed at the facility from 20,000 tonnes to 30,000 tonnes per year in total of waste; and
- Condition 6(a) of Schedule 2 of the consent to align the 12 month period of the approved capacity with the EPA licence reporting period, 23 October of each year, rather than the anniversary date of the development consent.

The proposal is subject to environment protection licence No 11180 (the Licence) under the *Protection of the Environment Operations Act 1997* for the Scheduled Activities of Waste Storage and Waste Processing (non-thermal Treatment). The proposed modification MOD-3 will require a variation to the licence to increase the volume of waste authorised to be processed at the Premises per year.

#### **Review of the Proposal**

The EPA understands from the documents provided that Enviroking propose to increase the quantity of waste processed at the Premises from 20,000 tonnes to 30,000 tonnes per year. Enviroking collect, treat and process liquid waste, including grease trap waste, liquid food waste, drilling muds and slurries, and oily wash waters. The proposal does not include any new buildings, alterations or additions to existing building or plant and equipment.

The EPA provided comment to a Scoping Report on 20 August 2021 (our ref DOC21/713500), which set out key information requirements for the proposed modifications. Our letter noted key considerations relating potential increased air, noise, odour and associated environmental impacts by increasing capacity at the Premises.

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The EPA notes that the Review Documents addressed the key information requirements and indicated little to no impact of the modification to surrounding land users or stakeholders. However, the EPA is concerned about the capacity for solid waste storage from the increased throughput.

The EPA has recently inspected the Premises and observed that a solid waste by-product material stored at the rear/side of the buildings was able to be impacted by rainfall. The EPA observed that waste woodchip is stored at the rear of the buildings uncovered; leachate from woodchip can be ecotoxic. There are no walls to prevent rainfall ingress to some key areas, and storage stockpiles can encroach onto uncovered areas, causing the potential for runoff from waste stockpiles to flow into the stormwater system. The EPA has been advised by Enviroking that since our inspection wastes inside the building have been “pulled back” to prevent them being impacted by rainfall.

The EPA proposes to negotiate a Pollution Reduction Program (PRP) under the Licence requiring: the covering of the rear storage area; the enclosure of certain walls of the building; and the regrading of hardstand to prevent any spills from entering the stormwater system. After the completion of the PRP the EPA would add the proposed condition shown below to the Licence.

### **Additional recommended condition**

If the Department of Planning is minded to grant consent to the modification the EPA recommends the following additional condition for the reasons provided:

1. All wastes at the premises must be stored under cover or in sealed tanks.

Reason: To mitigate the potential for stormwater to interact with waste and generate a liquid pollutant. These actions will ensure best practice waste storage and handling. These actions will also reduce the potential for the generation of offensive odours.

If the Department of Planning is minded to grant consent to the modification the EPA considers that the issues noted above regarding new roofing, walls and regrading are not of a significance to necessitate holding up the increased production capacity allowed under the consent and Licence.

### **Disposal of treated wastes**

Although not directly related to the modification application the EPA reminds Enviroking that it needs to have in place suitable management/disposal options in place for the increased throughput. All waste disposed to land must be conducted strictly in accord with any resource recovery order and exemption and in such a manner that the pollutants in the treated waste are sustainably reused by the land and not overapplied causing land pollution, water pollution or offensive odours.

If you have any questions about this request, please contact Carolyn Alford on (02) 49086894 or via email at [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au).

Yours sincerely

**PETER JAMIESON**  
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**Environment Protection Authority**