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David Ansen
Planning and Assessment Division
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

**EPA Advice on Environmental Impact Statement – Demast Sludge Dewatering Plant -
SSD-72775222**

Dear Mr Ansen

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to review the Environmental Impact Statement (EIS) for the proposed Sludge Dewatering Plant (Application SSD-72775222) at 7 Long Street, Smithfield NSW (Premises)

Demast Pty Ltd (the Proponent) hold Environment Protection Licence no. 20875 (the Licence) under the *Protection of the Environment Operations Act 1997* (Act) to undertake the scheduled activities of waste processing (non-thermal treatment) and waste storage at the Premises. The Licence permits:

- The receipt of the following wastes:
 - Stormwater contaminated with gross pollutants and street sweeping waste streams;
 - Concrete washout and residual batch concrete from agitator trucks;
 - Drilling mud, hydro excavation waste and non-destructive digging (NDD) waste;
- The receipt of no more than 46,720 tonnes of drilling mud per year; and
- The storage of no more than 640 tonnes of treated drilling mud (solid fraction) at any one time.

The EPA has reviewed the following documents:

- *Demast Sludge Dewatering Plant - State Significant Development - Environmental Impact Statement* (Revision 2) – Element Environment Pty Ltd – 24 October 2025 (EIS)
- *Noise Impact Assessment – Sludge Dewatering Plant Upgrade – 7 Long Street Smithfield, NSW* – Muller Acoustic Consulting Pty Ltd – 25 September 2025 (Noise Impact Assessment)
- *Air Quality Impact Assessment – 7 Long Street Smithfield – Sludge Dewatering Plant Upgrade* – Todoroski Air Sciences – 5 February 2025 (Air Impact Assessment)
- *Integrated Water Management Strategy – Sludge Dewatering Plant: 7 Long Street, Smithfield, NSW* - Martens & Associates Pty Ltd – 3 September 2025
- *Stormwater Management Scheme – Liquid Waste Treatment Facility - Environment Protection Licence - (EPL) 20875 - Demast Pty Ltd - 7 Long Street, Smithfield NSW 2164* - Demast Pty Ltd – 6 July 2022

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

Phone:
131 555

Email:
info@epa.nsw.gov.au

Website:
epa.nsw.gov.au

Visit:
6 Parramatta Square
10 Darcy Street
Parramatta NSW 2150

Mail:
Locked Bag 5022
Parramatta NSW 2124



The EPA understand the proposal is for:

- The increase in the annual throughput of waste at the Premises to 300,000 tonnes per annum.
- The addition of groundwater, general solid waste (non-putrescible) (GSW) soils, virgin excavated natural materials (VENM) and excavated natural materials (ENM) as wastes to be accepted at the Premises for the use in scheduled activities.
- The Proponent does not propose to change any existing site infrastructure, waste storage quantities or processes and has stated that existing plant and equipment and the Premises has capacity to receive and process this additional volume of material.

Based on the information provided, the proposal will require an Environment Protection Licence under sections 43 and 48 of the Act for scheduled activities under clauses 41 and 42 of Schedule 1 of the Act.

The EPA has reviewed the EIS and supporting documents and notes that they do not contain all the information required by the EPA within the EPA's Secretary's Environment Assessment Requirements in Notice no. 1641134 and dated 7 July 2024 (SEARs). Therefore, the EPA is unable to provide recommended conditions of approval for the Proposal at this stage.

1. Matters to be addressed prior to determination

a. Waste

Groundwater

The EIS has not addressed the SEARs requirement to include detailed information on the waste types proposed to be received at the Premises, specifically, details on the chemical content of the groundwater which is proposed to be received at the Premises.

Groundwater is a highly variable media and can often be significantly contaminated. Further information is required on the groundwater which is proposed to be received at the Premises. This should include proposed sources, limits on chemical contaminants, and testing regime including analytes.

Blending of wastes and production of Resource Recovery Order materials

The EIS states that GSW soils, ENM and VENM will be received as dry materials, to which recycled water will be added, following which the materials will be processed with existing NDD waste. It is further stated that *'GSW soils will not require separation from NDD waste during processing or storage due to its similar composition'*.

The EPA understand that the current resource recovery orders (RROs) issued to the Proponent have chemical requirements that are significantly below the contaminant threshold 1 (CT1) for GSW outlined in the EPA's *Waste Classification Guidelines*.

The Proponent should be aware that the blending of wastes to reduce the concentration of contaminants conflicts with the EPA's resource recovery principles. Dilution of contaminants is not considered an acceptable waste management option. Further, it is set out in the EPA's *Guidelines on Resource Recovery Orders and Exemptions 2018* that the EPA does not support the land application of wastes which are blended to reduce the concentration of contaminants. For clarity, this means that chemical and other attribute concentrations in the individual inputs to the production of an RRO material must be below the output concentrations specified in the RRO, and rigorous quality control would be required to ensure this.

2. Matters to be addressed with conditions

b. Air

The EIS states that air quality is a key potential environmental impact associated with the project. The EPA has reviewed the Air Impact Assessment and note that it is predicted that air pollutants emitted from scheduled activities at the Premises would comply with assessment criteria and not present an impact on the surrounding area or on the amenity of residential or industrial land uses.

Mitigation and management measures are presented in the Air Impact Assessment to minimise air emissions.

All reasonable and feasible measures must be implemented by the Proponent to manage potential impacts to air quality during the undertaking of scheduled activities at the Premises. Should the project be determined by way of approval, the EPA advises that impacts from dust will be managed through the Environment Protection Licence.

c. Noise

The EIS states that noise and vibration is a key environmental impact associated with the project. The EPA has reviewed the Noise Impact Assessment and note that it is predicted that noise emissions would comply with noise criteria during all assessment periods, and as such, management measures have not been proposed.

All reasonable and feasible measures must be implemented by the Proponent to manage potential impacts during the undertaking of scheduled activities at the Premises. Should the project be determined by way of approval, the EPA advises that impacts from noise will be managed through the Environment Protection Licence.

If you have any questions about this request, please contact Matthew Konza via email at info@epa.nsw.gov.au.

Yours sincerely



RUTH OWLER
Unit Head Operations
NSW Environment Protection Authority