

Proposed Liquid Waste Treatment Facility
10 Davis Road, Wetherill Park
Halgan Liquid Waste Solutions

**Secretary's Environmental Assessment Requirements:
Scoping Report**

November 2019



SUMMARY

This Scoping Report has been prepared to support the request for Secretary's Environment Assessment Requirements (SEARs) from the NSW Department of Planning, Industry and Environment (DPIE) for Halgan Liquid Waste Solutions (Halgan) to accept and treat liquid waste at 10 Davis Road, Wetherill Park, NSW 2164.

Halgan is proposing:

- Continued manufacturing of plastic tanks by moulding within the existing building;
- Treatment of 50,000 tonnes per annum (tpa) of liquid waste, comprising upto 30,000 grease trap waste tpa (K110) and upto 20,000 tpa industrial oily and muddy waters in a dedicated new area within the existing building. Residual waste would be transported off site to approved organic reuse or recycling facilities.

Halgan is an established Australian company with a strong market presence manufacturing wastewater treatment equipment. Halgan has recently expanded its Sydney presence with the lease of a new facility at 10 Davis Road Wetherill Park.

The 3820 square metre (sqm) site (Lot 603/260618) is located in a Zone 1 General Industrial area, and ideally located near major arterial roads - Elizabeth Drive and Reconciliation Road. The site has two driveways, parking for approximately 26 cars, an existing 1,400 sqm building with clear span, dual-access, roller doors, and existing administration/office facilities.

Wetherill Park is an established industrial area which permits a wide range of manufacturing activities on a 24/7 basis, provided are *not hazardous or offensive*. Adjacent land uses are heavy and light industrial, including manufacturing, fabrication, transport, waste treatment/transfer stations and recycling (e.g. Cleanaway, SUEZ), and chemical plants.

Unloading, treatment and load-out would be carried out within the building. Operations would be primarily from 4am to 6pm Monday to Saturday, although 24/7, 52 weeks per year, in order to cater for emergency contingencies and ameliorate traffic congestion.

The tanker fleet would be licenced by NSW EPA and Sydney Water (Waste Safe) for transport of Category 1 and Category 2 trackable waste.

Operations would generate negligible noise or air emissions beyond the site with effective treatment and mitigation. Unloading and treatment operations would be carried out within a bunded, confined area under negative ventilation, with a best-practice scrubber system discharging extracted and treated air to the atmosphere.

The existing building is well-suited to the proposed manufacturing and treatment operations, with minor structural modifications required. Construction will primarily comprise of installation of a new (additional) roller-door, construction of new solid internal walls, bunds, installation of storage tanks and physical separation treatment scrubber units, pipework and electrical/control systems, and commissioning.

Approximately sixteen (16) staff will be employed in total, with three (3) dedicated to the liquid waste operations. No off-site staff parking will be required, as the ample parking is available on-site, including disabled and visitor parking, to comply with existing Consent and Council DCP requirements. Existing facilities would be used for office requirements and amenities. All treated water will be discharged via a Sydney Water Trade Waste Agreement.

The site is zoned IN1 - Industrial and leased on a long term (5+5 year) basis.

The site has a current Consent (DA 578/2006) and is subject to Exempt and Complying Development SEPP (Subdivision 10A (Category 3): general industry to light industry).

Halgan anticipates volumes of liquid waste to be treated of up to 50,000 tpa of liquid industrial waste (grease trap and oily or muddy) water within five years of commencement.

The proposal will be defined as State Significant Development (SSD) and require an EIS to be prepared. The Minister for Planning (or their delegate) determines development applications for SSD under Part 4 of the EP&A Act. The proposed operation will also require a licence from the NSW EPA.

Environmental risk assessment will be carried out for operation of the proposed development. The following specialist studies are anticipated to be required:

- Air quality assessment - to optimise air quality design and equipment selection, and to predict potential odour and amenity impacts;
- Traffic, access and parking analysis - to assess impacts on local roads, parking requirements, site access and internal manoeuvrability. This will include swept path analysis;
- Acoustic Study - to model likely noise generation and impacts on surrounding land uses;
- Flood Risk Management Plan - as Wetherill Park is within Council's flood-risk zone, and the part of the site is within a medium-risk area of local overland flooding. The survey levels for the site and building would be compared to the predicted flood levels, and measures developed to manage risk to operations, access, adjoining properties etc. This will require the preparation of a Flood Risk Study as required by Development Control Plan (DCP).

Key operational documents will be provided, including Fire Safety Schedule, draft Operational and Environmental Management Plans, and consultation/approvals for works from utilities including Transgrid and Sydney Water.

Preliminary environmental assessment concludes that the proposed changes would have negligible environmental and community impact, and no adverse impacts on neighbouring land uses. The changes are concluded to be consistent with all planning instrument requirements, and would enable greater recycling within the Smithfield-Wetherill Park Industrial Estate and across Sydney.

The project has been assessed in terms of the principles of ecologically sustainable development, as required by legislative and Halgan's policy requirements. The proposed changes to the Facility are concluded to be justified in terms of the principles of ESD and in social, economic and environmental criteria, and will:

- Provide greater treatment and recycling capability for grease trap waste and oily water in the growing Sydney metropolitan market;
- Provide benefits to the community and environment through the encouragement of recycling and cleaner production techniques;
- Be compatible with current and future land use in the Wetherill Park Industrial Estate.

The proposed development is also concluded to fully comply with all legislative, statutory and policy guidelines of NSW Government, NSW EPA and Fairfield City Council.

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1 INTRODUCTION

1.1 BACKGROUND

This Scoping Report has been prepared by Wild Environment Pty Ltd for Halgan Liquid Waste Solutions Pty Ltd (Halgan) for the proposed liquid waste treatment facility (Lot 603/ DP 260618) at 10 Davis Road, Wetherill Park NSW 2164. The site is located in the Smithfield-Wetherill Park Industrial Estate, south of the Prospect Reservoir.

Figure 1.1 shows the location of the site.

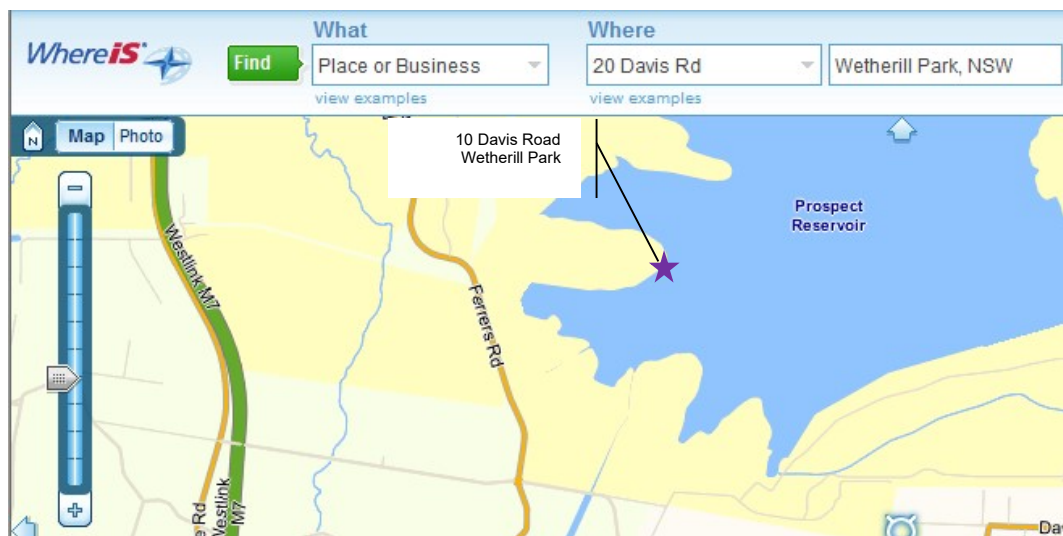


FIGURE 1.1: Site Location

1.2 OUTLINE OF THE PROPOSAL

Halgan has recently relocated from Brookvale with the lease of a new site at 10 Davis Road Wetherill Park. Manufacturing of plastic units is being carried out within the existing building, and administration/sales/technical support within the existing office facilities at the site.

Halgan is proposing:

- Continued manufacturing of plastic tanks and treatment units within the existing building;
- Treatment of 50,000 tpa of liquid waste, comprising upto 30,000 tpa of grease trap waste (K110) and upto 20,000 tpa industrial oily and muddy waters (refer **Table 5.1**) in a dedicated new area within the existing building. Treated residues would be transported off site to approved organic reuse or recycling facilities.

Unloading, treatment and load-out would be carried out within the building. Operations would be primarily from 4am to 4pm Monday to Friday, although approval for 24/7, 52 weeks per year will be sought in order to cater for industry emergency contingencies.

The tanker fleet would be licenced by NSW EPA and Sydney Water (Waste Safe) for transport of Category 1 and Category 2 trackable waste - this has not been included within this Scoping Report.

Operations would generate negligible noise or air emissions beyond the site with effective treatment and mitigation. Unloading and treatment operations would be carried out within a bunded, confined area with managed ventilation, with a best-practice scrubber system discharging extracted and treated air to the atmosphere.

The existing building is well-suited to the proposed manufacturing and treatment operations, with minor structural modifications required. Construction will primarily comprise of installation of a new roller-door, construction of solid internal walls, bunds, installation of storage tanks and physical separation treatment scrubber units, pipework and electrical/control systems, and commissioning.

Approximately sixteen (16) staff will be employed. No off-site staff parking will be required, as the ample parking is available on-site, including disabled and visitor parking, to comply with Council DCP requirements. Existing facilities would be used for office requirements and amenities. Treated water will be discharged to sewer in accordance with a Sydney Water Trade Waste Agreement.

1.2.1 The Proponent

The proponent is Halgan Liquid Treatment Pty Ltd (Halgan), a privately-owned company trading for more than twenty years. Halgan is an established Australian company with a strong market presence manufacturing liquid waste treatment equipment for the industrial and commercial market in Brisbane, Sydney and Melbourne. Over the past twenty years Halgan has manufactured a wide range of treatment units including grease traps, stormwater tanks, rainwater tanks etc. using heat-treatment plastic (roto-moulding) to provide equipment that is light-weight, durable and sustainable.

For further information on Halgan's services refer to the web site www.halgan.com.au.

1.2.2 Need for Proposed Development

Rapid population growth in the Sydney metropolitan area, and the increasing popularity of restaurant/takeaway/home-delivery meals, has resulted in an increase in the number of commercial kitchens. Since Sydney Water introduced stringent discharge requirements in the 1980's to restrict the discharge of oils to the sewer system, the volume of grease trap waste requiring collection and treatment has grown rapidly. The proposed development would increase the treatment capacity in Sydney to safely and sustainably meet the changing waste market, and increase recycling for beneficial reuse, generally by land application.

Oily water largely results from washdown of commercial/industrial sites, and requires separation of the oil component. The concentrated oil is then transported to specialist oil recyclers for reuse.

Both streams will produce treated water for discharge to the sewer system in accordance with a Sydney Water Trade Waste Agreement.

The proposed development is described in detail in **Section 5** of this Report.

1.2.3 Project Schedule

Subject to planning and other approvals, construction and installation of the plant and equipment would be carried out over a three-month period. Commissioning and optimisation would then take approximately one month, during which all management plans and procedures would be reviewed and updated if necessary. Operations would commence following issue of the Occupancy Certificate and NSW EPA Licence.

1.3 OBJECTIVES OF THE DEVELOPMENT

The primary objective of the proposed development would be to provide improved capability to treat and beneficially reuse liquid waste for the growing Sydney market.

1.4 ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

The proposed changes to the Facility will be assessed under Part 4 of the *Environmental Planning & Assessment (EP&A) Act, 1979*.

The premises are located within the Smithfield-Wetherill Park Industrial Estate, and the site is zoned IN1 – General Industrial under Fairfield Local Environmental Plan (LEP) 2013. The proposed development is consistent with the currently approved land use and zoning, and is permissible with consent.

The site and proposed development will be assessed with regard to Fairfield City Wide Development Control Plan (DCP) 2013. Consistency with these planning instruments is detailed in Section 2 of this Scoping Report.

The site has a current planning Consent (DA 578/2006) and manufacturing (plastic moulding) operations are currently carried out in accordance with NSW *State Environmental Planning Policy (SEPP) (Exempt and Complying Development)* (Subdivision 10A (Category 3): general industry to light industry).

The proposal would be defined as designated development because, pursuant to *EPA Regulation (2000)* Schedule 3 (clause 32) (1)(c), the development would be a “*waste management facility or works that store, treat, purify or dispose of waste or sort, process, recycle, recover, use or reuse material from waste .. more than 5,000 tpa of liquid organic materials*”.

Pursuant to Section 89C of the EP&A Act, projects are classified as State Significant Development (SSD) if they are declared to be as such by the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP). Clause 23 of Schedule 1 of the SRD SEPP identifies the following types of developments to be SSD: (6) “*Development for the purpose of any other liquid waste depot that treats, stores or disposes of industrial liquid waste and –*

- a) handles more than 10,000 tpa of liquid food or grease trap waste, or*
- b) handles more than 1,000 tpa of other aqueous or non-aqueous liquid industrial waste.”*

Based on the intended handling capacity of the Facility, the development is classified as SSD. The Minister for Planning (or their delegate) determines development applications for SSD under Part 4 of the EP&A Act. The Minister may delegate the consent authority function to the NSW Planning Assessment Commission (PAC) in certain circumstances where there is objection from local government, or over 25 submissions are received during the EIS exhibition period.

This requires that Halgan seek Secretary Environmental Assessment Requirements (SEARs) from DPIE to set out the requirements of the Environmental Impact Assessment (EIS).

The development would be a scheduled activity and defined as integrated development pursuant to Schedule 1 of the *Protection of the Environment (Operations) Act (1997)*. A Licence from the NSW Environment Protection Authority (EPA) would be required.

Preliminary assessment concludes that there are no actions that could have a significant impact on matters of National Environmental Significance, hence it is

considered that there are no additional approvals required under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999*.

The EIS would assess the cumulative impacts of the existing site operations and the proposed changes, and all relevant policies and statutory instruments.

2 ASSESSMENT & APPROVAL PROCESS

The environmental and planning framework relevant to the proposed development can be categorised into three areas:

- **planning approvals framework** - governs the planning approval process and generally derived from the EP&A Act;
- **environmental planning instruments and strategy documents** - establishes the matters for consideration for assessment of the proposal;
- **environment protection legislation** - determines the specific environmental approvals required for the proposal.

These three subject areas are discussed in the following sections.

2.1 PLANNING APPROVALS FRAMEWORK

2.1.1 Environmental Planning and Assessment (EP&A) Act 1979

Development consent is required under Part 4 of the EP&A Act if an environmental planning instrument states that a project is permissible with development consent (refer to **Section 2.2.1.1** for a description of the permissibility of the proposed development under the Fairfield Local Environmental Plan 2013).

The EP&A Regulation (2000), Schedule 3, Clause (2) (i), states that “plastics industries:

- (i) that manufacture more than 2,000 tonnes per year of synthetic plastic resins, or*
- (ii) that reprocess more than 5,000 tonnes of plastics per year otherwise than by a simple melting and reforming process..”*

are defined as designated development.

Halgan’s current manufacturing process consumes approximately 225 tpa of synthetic (plastic) powder in the heat moulding of wastewater tanks. It is anticipated that manufacturing would double by 2024 i.e. 450 tpa. Therefore the manufacturing process volumes will not exceed the thresholds in the EPA Regulation above, and the manufacturing operations will not be not defined as designated development.

2.1.2 State and Regional Development SEPP 2011

This SEPP (Clause 23 (6) Waste and Resource Management Facilities) states that development for “*liquid waste depots that treat, store or dispose of industrial liquid waste and...*

- a) handles more than 10,000 tpa of liquid food or grease trap waste*
- b) handles more than 1,000 tpa of other aqueous or non-aqueous of liquid industrial waste ..”*

is defined as State Significant Development.

This requires Halgan to seek Secretary’s Environmental Assessment Requirements (SEARs) from DPIE to set out the requirements for the Environmental Impact Statement (EIS). The Minister for Planning (or their delegate) determines development applications for SSD under Part 4 of the EP&A Act. The EIS must also meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the *EP&A Regulation (2000)*.

2.1.3 Integrated Development

The proposed development would be defined as a scheduled activity pursuant to Schedule 1 of NSW *Protection of the Environment Operations* (POEO) 1997 Act, and will require concurrence approval from NSW EPA. An environment protection licence will be required for operation of the facility.

In addition, the proposed development will be considered integrated development in accordance with section 91A of the *EP&A Act*.

2.2 ENVIRONMENTAL PLANNING INSTRUMENTS AND STRATEGY DOCUMENTS

Under the *EP&A Act*, land development is subject to local, regional and state planning instruments, as outlined below.

2.2.1 Local Planning Instruments

2.2.1.1 *Fairfield Local Environment Plan (2013)*

The subject land, Lot 603 DP 260618, is zoned General Industrial Zone IN1 in accordance with Fairfield LEP 2013. The objectives of the zone and how the development meets those objectives are set out in **Table 2.1** below.

Table 2.1: Consistency with Objectives of LEP 2013, General Industrial Zone IN1

Objective	Consistency with Objective
To provide a wide range of industrial and warehouse land uses.	Proposed development is consistent with existing and permissible land uses within zone and surrounding areas. A broad range of industrial employment opportunities are encouraged by facilitating beneficial reuse of resources for reprocessing.
To encourage employment opportunities	Consistent with objective: will encourage employment directly (at Facility) and indirectly in related service businesses.
To ensure development is not likely to detrimentally affect the viability of any nearby business centre.	No impact
To minimise any adverse effect of industry on other land uses	Previous operations and assessed impacts of change conclude no adverse impacts on other land uses.
To support and protect industrial land for industrial uses.	Maintains valuable industrial use on existing Site, with no adverse impacts on surrounding industrial lands.

The proposed changes to the existing facility are considered likely to comply with these definitions, and should therefore be permissible with consent.

The General Industrial Zone IN1 also prohibits hazardous and offensive industry. The EIS will need to demonstrate that, with appropriate mitigation measures, there will be

no adverse odour, noise or amenity impacts, and therefore that the proposal is not hazardous or offensive.

There are no LEP principal development standards (e.g. lot size, height, FSR etc.) controls relating to the Site, and in any case, the envelope of the building will not be altered. The land has no heritage items located on or near it, is not within a potential acid sulphate soil area, riparian area, or bush fire risk area. Council has identified the Site as having a medium risk of overland flood, which will be investigated during the EIS process, and an appropriate Plan developed.

2.2.1.2 Fairfield City Wide Development Control Plan 2013

Fairfield City Wide Development Control Plan (DCP) 2013 provides detailed guidelines and standards that must be considered for all new development. Particular elements of the DCP of relevance to the proposed development include:

- Environmental Site Analysis (Chapter 3) – specifically the requirements for submitting a DA and an outline of information to be included in an EIS;
- Development Control for Industrial Development (Chapter 9) – guiding principles for the development which are addressed in Table 2.2 below;
- Flood Risk Management (Chapter 11) – see Table 2.2;
- Car Parking, vehicle and access management (Chapter 12) – see Table 2.2.

Table 2.2: Fairfield City Wide DCP 2013 relevant provisions

Provision	Consideration	Outcome
9.2 Car parking, vehicle and access management	Referral to NSW Roads and Maritime Services (RMS) for traffic generating development and controls relating to the requirements for car parking and vehicular site access.	Referral to the RMS and Council. Refer also Section 6.6
9.4 Streetscape and amenity	Hours of operation, if more than 500m from residential areas, to be considered based on Acoustic Report.	More than 500m from residential areas. Acoustic report to be carried out.
Chapter 11	Part of the Land identified by Council to be at within a medium-risk overland inundation zone (S149 Certificate).	Investigate & develop appropriate Management Plan.
12.1.1 Parking Rates	Resource Recovery Facility – Merit-based assessment	Traffic/access/parking Study. Refer to Section 6.6
12.2 Design Guidelines	Provides detailed design guidelines for car parking.	Refer to Section 6.6. The Proposal includes car parking which will comply with the design provisions.

2.2.2 State and Regional Plans

2.2.2.1 State Environmental Planning Policies

Consideration has also been given to relevant State Environmental Planning Policies (SEPPs) and Plans including:

- State Environmental Planning Policy (Infrastructure) 2007
- SEPP No. 33 – Hazardous and Offensive Development
- SEPP No. 55 – Remediation of Land
- State Environmental Planning Policy (Western Sydney Parklands) 2009
- NSW Waste Avoidance and Resource Recovery (WARR) Strategy 2014-21
- A Plan for Growing Sydney 2014

State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP)

Under the Infrastructure SEPP, Zone IN1 General Industrial is a prescribed zone in accordance with Clause 120. This clause identifies a resource recovery facility as:

resource recovery facility means a facility for the recovery of resources from waste, including such works or activities as separating and sorting, processing or treating the waste, composting, temporary storage, transfer or sale of recovered resources, energy generation from waste gases and water treatment, but not including re-manufacture of material or goods or disposal of the material by landfill or incineration.

In addition, a resource recovery facility is defined as a type of waste or resource management facility under the following definition:

Waste or resource management facility means a waste or resource transfer station, a resource recovery facility or a waste disposal facility.

Under Clause 121 of the Infrastructure SEPP:

a) Development for the purpose of waste or resource management facilities, other than development referred to in subclause (2), may be carried out by any person with consent on land in a prescribed zone.

The Proposal is therefore in accordance with Clause 121 of the Infrastructure SEPP and is therefore permissible with consent.

In addition, Clause 104, in conjunction with Schedule 3, of the Infrastructure SEPP identifies resource recovery or waste transfer stations of any size or capacity as being traffic generating activity under Column 1 of Schedule 3. The provisions of this SEPP require the consent authority to give written notice of the development application and consider any responses received from the consent authority, in this case Roads and Maritime Services (RMS).

SEPP No. 33 – Hazardous and Offensive Development

SEPP 33 provides definitions for 'hazardous industry', 'hazardous storage establishment', 'offensive industry' and 'offensive storage establishment'. The definitions apply to all planning instruments, existing and future. The policy also requires specified matters to be considered for proposals that are 'potentially hazardous' or 'potentially offensive' as defined in the policy.

An assessment of the proposed development was undertaken using the methodology given in 'Applying SEPP 33, Hazardous and Offensive Development Application Guideline'. The guidelines include a threshold screening test used to determine whether a development is potentially hazardous. The proposed changes were assessed as follows:

- Maximum quantities of dangerous goods do not exceed the screening thresholds for any class of good
- The transportation screening thresholds are not exceeded
- The development therefore does not fall within the definition of potentially hazardous industry.

The proposed changes have the potential to emit polluting discharges (primarily odour) that would cause a level of offence in the absence of control measures.

However, an air quality / odour assessment study (see **Section 6.4 and Appendix B**) will be carried out and is anticipated to conclude the negligible impacts from the proposed changes and odour levels will comply with NSW EPA odour goals. If impacts are controlled, development is concluded not to be offensive and should therefore be permissible within the zoning.

Further, public health and safety, and the occupational amenity of neighbouring land uses, will not be impacted by vectors due to extensive and rigorous controls as described in **Section 6.9**.

This Scoping Study therefore concludes that the proposed changes would not exceed the screening test of SEPP 33 as potentially hazardous or offensive.

SEPP No. 55 – Remediation of Land

Changes would be carried out by installation of facilities within existing building. No excavation is anticipated, but should this be required, any waste would be classified in accordance with NSW EPA Guidelines and disposed of to appropriately licenced facilities.

10 Davis Road is not listed on the NSW EPA Contaminated Lands Register.

State Environmental Planning Policy (Western Sydney Parklands) 2009

Nearby land to the Site is located within the area known as the Western Sydney Parklands and to which the State Environmental Planning Policy (Western Sydney Parklands) 2009 applies. There are no provisions within this SEPP which apply to development adjacent to the parkland sites and therefore the SEPP does not apply to the Proposal site.

NSW Waste Avoidance and Resource Recovery (WARR) Strategy 2014-21: provides targets for the reduction in waste to 2021. The objectives and targets of the Strategy are to:

- 1) Avoid and reduce waste generation;
- 2) Increase recycling;
- 3) Divert more waste from landfill;
- 4) Manage problem wastes better;
- 5) Reduce littering;

6) Reduce illegal dumping.

The Strategy includes targets to increase recycling of municipal solid waste, and commercial and industrial waste to 70% by 2021-22. The proposed Facility will assist in meeting this target and is considered to be consistent with the NSW WARR Strategy.

A Plan for Growing Sydney 2014: Action 4.2, Identify and Protect Land for New Waste Management Facilities, identifies that Sydney will require additional waste and recycling infrastructure of:

- additional recycling infrastructure capacity of 165,000 tpa for municipal (local council) waste;
- additional recycling infrastructure capacity of 380,000 tpa for commercial and industrial waste;
- an additional 25 community recycling centres for recycling of household hazardous waste.

The Plan identifies the need for the identification and protection of new locations for waste management infrastructure, for example at the proposed Halgan Facility.

2.3 ENVIRONMENTAL LEGISLATION

2.3.1 NSW State Legislation

2.3.1.1 *Protection of The Environment Operations Act 1997*

The *Protection of the Environment Operation Act (POEO) 1997* aims to protect, restore and enhance environmental quality, decrease risks to human health and prevent the degradation of the environment. The Act provides for the regulation of noise, air and water pollution and waste management.

Waste facilities are a scheduled activity under the Act, and as such require an Environment Protection Licence (EPL) from NSW EPA, which set conditions that must be adhered to during operation.

2.3.2 Commonwealth Legislation

No Commonwealth legislation is considered to be applicable to this proposal. No vegetation is to be cleared.

2.3.3 Other Agency Requirements

Relevant agencies and key stakeholders will be consulted for this proposal. Fairfield City Council (FCC) was consulted on 8 October 2019 (refer Appendix D), and DPIE on 30 October 2019. Initial consultation has been carried out with Sydney Water (sewer capacity and Trade Waste Agreement requirements) and Transgrid (overhead easement).

EPA and NSW Fire & Rescue have been contacted, and any feedback regarding approval/concurrence requirements will be sent to DPIE when received.

2.4 CONCLUSION

All relevant statutory instruments will be considered in the concept development and assessment of this proposal. It is considered that all matters will be addressed where applicable, and that the proposal will fully comply with the objectives and requirements of all relevant statutory instruments.

3 CONSULTATION

Halgan embraces the principles of sustainable development, and actively seeks input and involvement from the wider community. Halgan is committed to early engagement of all interested stakeholders and parties potentially affected by the development, and a consultation strategy has been implemented to provide information and gain feedback.

3.1 CONSULTATION PROGRAM

A list of the organisations to be contacted and issues raised is provided in **Table 3.1**.

Table 3.1: Stakeholder Consultation

Organisation Consulted	Date	Comments
Fairfield City Council (pre-DA meeting)	8 Oct. 2019	<ul style="list-style-type: none"> • Odour, noise, traffic/access, flood assessment reports required • Site suitability and permissibility. Verify site manoeuvrability and parking • Demonstrate compatibility between manufacturing and liquid treatment operations • BCA Compliance Statement required • To verify setback and landscaping (DCP Ch9) • Management plans for plastic bead if used for manufacturing • Fire/SEPP33 • Meeting notes to be issued by Council
Transgrid	2 Oct 2019	<ul style="list-style-type: none"> • Preliminary consultation re. approval to carry out works near overhead powerline easement.
DPIE	30 Oct 2019	<ul style="list-style-type: none"> • Provided overview & sought feedback • DPIE requested further detail on waste types and operational contingencies • Halgan to review and implement DPIE Major Projects draft Early Engagement Guidelines • DPIE advised Waiver Applications to be submitted for Aboriginal Cultural Heritage and Biodiversity Assessment
NSW EPA	15 Nov 2019	<ul style="list-style-type: none"> • Provided overview to Manager, Hazardous Materials • Sent Scoping Report & meeting request
NSW Fire & Rescue (9742 7434)	15 Nov 2019	<ul style="list-style-type: none"> • Follow up required
Sydney Water	Sept. 2019	<ul style="list-style-type: none"> • Sufficient local sewer capacity exists • Trade Waste Agreement will be required, with stringent discharge limits and monitoring.

3.2 CONSULTATION WITH LANDOWNERS AND SURROUNDING BUSINESSES

Halgan acknowledges the need to be a good neighbour and to minimise the footprint of its operations while operating a viable recycling operation.

Adjacent businesses have been consulted in early October 2019 to explain the proposal and seek feedback. No objections were raised at this stage. Further consultation with landowners and businesses will be carried out during preparation of the EIS, and responses included in the EIS.

4 OPTIONS ASSESSMENT

4.1 NEED FOR THE PROPOSAL

4.1.1 Introduction

Prevention of organics and oils from discharge to the sewer system and the broader environment is a well-established and essential principle. This proposal meets the stated and legislated policies of the NSW Government, Sydney Water and Halgan in waste avoidance and protection of the environment.

4.1.2 Strategic Fit with State and Regional Initiatives

The proposed changes are consistent with the NSW Government's current waste management framework which focuses on reducing potential hazards to the environment and capturing value from materials that would otherwise be disposed of to landfill or illegally disposed of.

In particular the NSW Government introduced the Waste Avoidance and Resource Recovery Act (2001) which takes into account the potential resource value and future use of materials in accordance with ESD (ecologically sustainable development) principles.

An exhaustive search was carried out within Sydney to identify the most suitable site for relocation of Halgan's Brookvale operation to cater for longer-term growth and establishment of a liquid waste treatment facility. The site at 10 Davis Rd was selected as it met the search criteria and had the following characteristics:

- Appropriate zoning (IN1-General Industrial);
- Appropriate access and size of site to justify investment;
- Suitable existing building with excellent clearances;
- Strong local employment focus and suitable skill base;
- Ready access to potential markets;
- Excellent access to arterial road network to enable transport of manufactured goods, and treated material to regional NSW for recycling by land application and concentrated oils top specialist recyclers;
- Ample off-street parking;
- Local synergies e.g. business for maintenance and supplies;
- Long term lease enabling investment to create industry-best practice operation.

On a local level, the proposed development is consistent with the objectives of Chapter 9 – Development Controls for Industrial Development in Fairfield City Council's City Wide DCP (2013) as the proposal supports and '*reinforces recycling and waste management principles*'.

4.1.3 Benefits to Commercial and Industrial Industries

The proposed development will provide commercial generators of liquid waste both economic and cleaner production advantages by being able to recycle all their wastes safely in an easily accessible and environmentally-friendly facility. This material can then be re-used for beneficial industrial and agricultural purposes.

4.1.4 Conclusion

By reducing environmental harm associated with liquid waste in accordance with the

principles of ecologically sustainable development, the proposed development is consistent with NSW Government, Fairfield City Council, Halgan's Corporate Policy and community expectations.

4.2 CONSEQUENCES OF NOT PROCEEDING

The principal alternative to the proposal is a "Do Nothing" scenario, whereby the growing Sydney market will have limited access to additional treatment capacity. Under this scenario:

- Further stress would be placed on finite, already-limited treatment capacity;
- Supply of resources for beneficial reuse (e.g. land application) would be reduced;
- The effective management of treatment of liquid waste in the Sydney market is likely to diminish, and costs increase;
- Community, Government and regulatory expectations for reducing and recycling waste as a valuable resource would not be met.

5 DESCRIPTION OF THE PROPOSAL

5.1 SITE LOCATION, LAND OWNERSHIP AND SURROUNDINGS

The site is located in the Smithfield-Wetherill Park Industrial Estate on Lot 603 DP 260618, 10 Davis Road, Wetherill Park NSW 2164. This industrial estate is located approximately 35km west of Sydney CBD, south of the Prospect Reservoir. **Figure 1.1** shows the location of the facility and the surrounding land uses.

The site is owned by F.S.G. (HOLDINGS) Pty Ltd, and leased by Halgan under a long-term lease (refer to Certificate of Title in **Appendix A**).

Access to the Smithfield-Wetherill Park Industrial Estate is via Hassall Street, Davis Road, Elizabeth Street and Victoria Street. Reconciliation Drive provides access to the M4 Motorway. Hassall Street provides wide carriageways and experiences constant traffic flows over extended operating periods. Hassall Street is well serviced by a number of major roads including The Horsley Drive to the south, the Cumberland Highway to the east and Westlink M7 to the west.

The site is also subject to a 30 metre easement for an overhead power line. TransGrid has advised Council that it also intends to enter into restrictive covenant agreements with owners for a further 15 metres either side of the existing easement. As no building works are contemplated, approval from Transgrid may only be required for transport of plant into the site during the construction phase, and for potential installation of solar panels.

Adjoining sites are of similar design and use, comprising a mix of light and heavy industries such as cabinet making, panel beating, and engine repair workshops.

Figure 5.1, 5.2 and **5.3** show an aerial overview, the existing site layout and traffic access. There will be no change to the footprint, area or elevation of site buildings as a result of the proposal.



Figure 5.1: Aerial of Site (Existing)

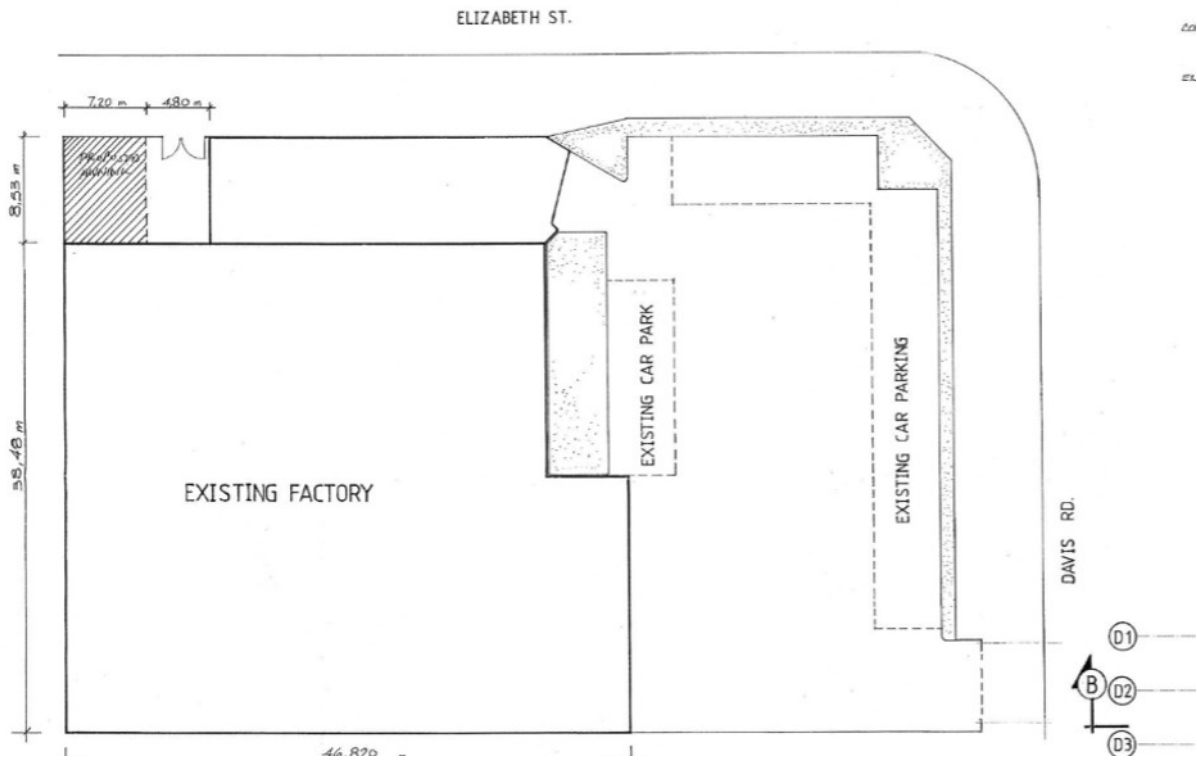


Figure 5.2: Site Plan (Existing)

5.2 DESCRIPTION OF EXISTING FACILITIES

The area of the site is approximately 3,820 sqm, and dimensions approximately 77m by 54m.

Access to the site is from Davis Road, although egress to Elizabeth Street is feasible. There is a wide grassed verge on the western and northern frontages, with several established native street trees.

The existing building is well suited to manufacturing and industrial operations, with a floor area of approximately 1658 sqm, and dimensions approximately 46m by 38m wide. The building is of utilitarian design, with six metre internal clearances, concrete slab floor, steel structure, galvanised steel roof and concrete panel walls. Access is by roller doors from the main entrance off Davis Road, and secondary egress to Elizabeth Street. The floor slab of the building is designed to capture all spillages. Dust suppression sprinklers have been installed in the roof and suitable fire protection is in place.

Office facilities comprise approximately 260 sqm, consisting of an adjacent ground-floor administration office, and a mezzanine office overlooking the operational area.

Vehicle parking consists of 26 spaces on the concrete apron fronting the building, which are suitable for both light and heavy vehicles.

The existing building will continue to be used for manufacturing plastic tanks for waste treatment, which are transported and sold to businesses in NSW, Queensland and Victoria. Most of the southern and western areas will continue to be dedicated to this process, as shown in **Figure 5.3**. The plastic moulding process is straight-forward and comprises the following basic steps:

- Powdered plastic is transported to site and heat-treated (by gas) in two large rotating moulding machines;
- Formed units are tested, modified as required and stored in internal racks for short periods;
- Finished units are transported by heavy rigid vehicles (HRVs) to distributors, plumbers and commercial end-users.

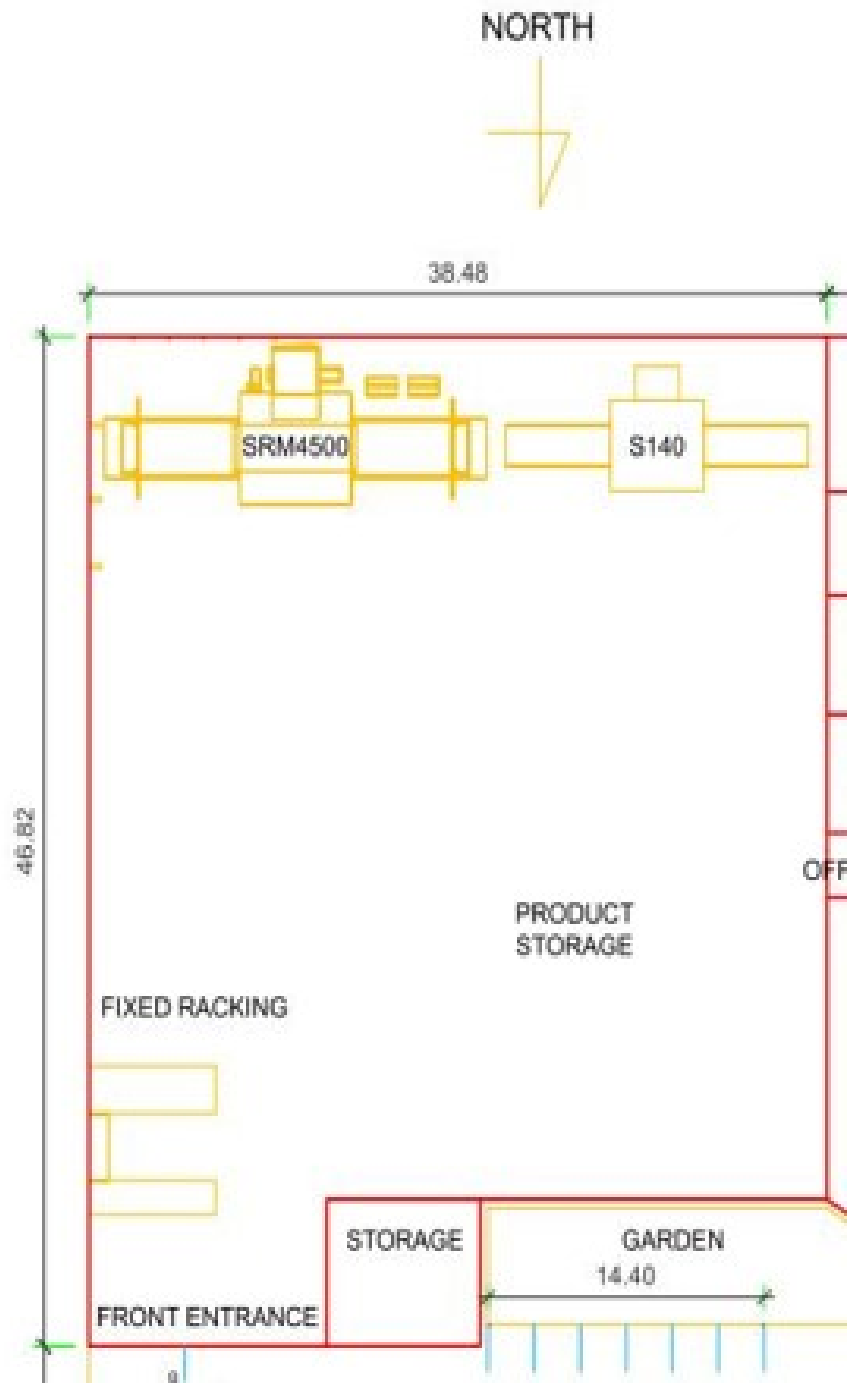


Figure 5.3 Existing Site Layout

5.3 PROPOSED FACILITIES AND PROCESSES

The proposal comprises:

- Continued manufacturing of plastic tanks by moulding within the existing building;
- Treatment of 50,000 tpa of liquid waste, comprising upto 30,000 tpa of grease trap waste (K110) and upto 20,000 tpa of various oily waters of various NEPM codes (refer **Table 5.1**) in a dedicated new area within the existing building. Residual waste would be transported off site to approved organic reuse or recycling facilities.

5.3.1 Liquid Treatment Waste Process

The dedicated treatment area, shown in **Figure 5.5**, would be designed, built and operated to receive and store the two liquid waste streams completely separately. This is required to prevent any risk of cross-contamination of the two streams.

Industrial liquid wastes, upto a limit of 20,000 tpa, would comprise the streams as set out in **Table 5.1** below:

Industrial liquid wastes	NEPM Code*
Fire debris and fire wash waters	N140
Waste mineral oils unfit for their original intended use	J100
Waste oil/water, hydrocarbon/water mixtures, emulsions	J120
Groundwaters	Z140
Drilling mud and/or muddy water from drilling operations	No Code

Table 5.1 Proposed Industrial Liquid Waste Streams

*Transport of liquid wastes in Australia is regulated by the *Australian Hazardous Waste Data and Reporting Standard* (2017), developed and adopted by all Australian, state and territory governments. This Standard designates industrial liquid waste codes using *National Environment Protection (Movement of Controlled Waste between States and Territories) Measure* (the NEPM).

A small fleet of specialised liquid waste tankers will collect liquid waste from businesses and transport to the site. Incoming liquid waste loads would generally be homogenous loads from sources such as businesses, restaurants and supermarkets.

Dedicated trucks would be used for the transport of grease trap waste (refer Figure 5.4). Trucks would be approved by Sydney Water for the transport (only) of grease trap waste.

Industrial liquid waste trucks will be approved for the transport of dangerous good by NSW EPA and all loads tracked in accordance with EPA Regulated Waste (WasteSafe) requirements.

All receival and storage tanks would be hard-plumbed to eliminate the need for operators to disconnect/connect hoses. All treatment systems will be automated with lock out systems to prevent cross contamination. On receival of grease trap waste the automated system will “lock out” access to all industrial liquid tanks and processes. Similarly, on receival of industrial liquid waste the automated system will “lock out” access to all grease trap tanks and processes.

The handling process would entail:

- Tankers would enter the yard in the forward direction by the main Davis Road entrance then reverse through the new roller door into a bunded unloading bay within the new enclosed treatment operations area. The roller door will be closed prior to discharge. There would be no queuing of trucks as, in the worst-case scenario, two trucks could wait within the yard while one is unloading;
- Operator will activate the automated lock out system depending on the waste stream Tankers will discharge under vacuum through a primary screening mechanism into two 20KL receival tanks. Receival tanks will have load cells installed to electronically record loads and volumes. The primary screens will remove any gross solids and contamination, with air ducted to the scrubber;
- The contents of the receival tanks will be pumped to storage tanks. All connection lines within the facility will be hard-plumbed which will eliminate any leakages and minimise fugitive emissions.
- Grease trap waste will be settled for at least 4 hours in accordance with the NSW

EPA Resource Recovery Order – Treated grease trap waste). After settling, the treated water will be pH adjusted, then pumped to the Diffused Air Flotation (DAF) unit for treatment prior to discharge to Sydney Water sewer system. The recovered oil, grease and solids will be separated and sent to storage tanks for lime amendment. Approximately 70% of waste will be treated water, which will be tested then discharged to sewer in accordance with the Sydney Water Trade Waste Agreement. After the settled water is removed from the storage tank/s the remaining oil/grease and solids are pumped to a solids storage tank. The floating layer (oil/grease) will be incorporated into the bottom settled solids layer allowing saponification by the addition of lime. The lime-amended sludge will then be directed to an approved reuse facility as approved by the EPA.

- Oily water will be settled then pumped to a plate separator to remove free floating oil. The recovered oil will be directed to a recycling facility for reuse. The remaining liquid phase after the plate separator will be treated via a DAF unit and discharged to the Sydney Water sewer system under an Industrial Trade Waste licence. Residual sludge for the process will be directed to an EPA approved treatment facility.
- The entire treatment area will be enclosed and subject to odour management. All potentially contaminated air will be treated through the scrubber prior to discharge in accordance with the EPA Licence (refer Figure 5.6). The treatment area will be bunded in accordance with EPA Guidelines, and cleaned daily. Any spills will be attended to immediately;
- Treated product would be stored separately and removed daily to beneficial reuse, primarily land application for grease trap material, or specialist oil recyclers for the concentrated oils. It is anticipated that on average one load per day of each stream will be removed, so that the material is stored on site for less than 24 hours, thereby reducing storage volumes.



Figure 5.4 Collection Vacuum Tanker (Grease Trap Waste)

The proposed layout is shown on **Figure 5.5**. Operational management measures are discussed further in Chapter 6.

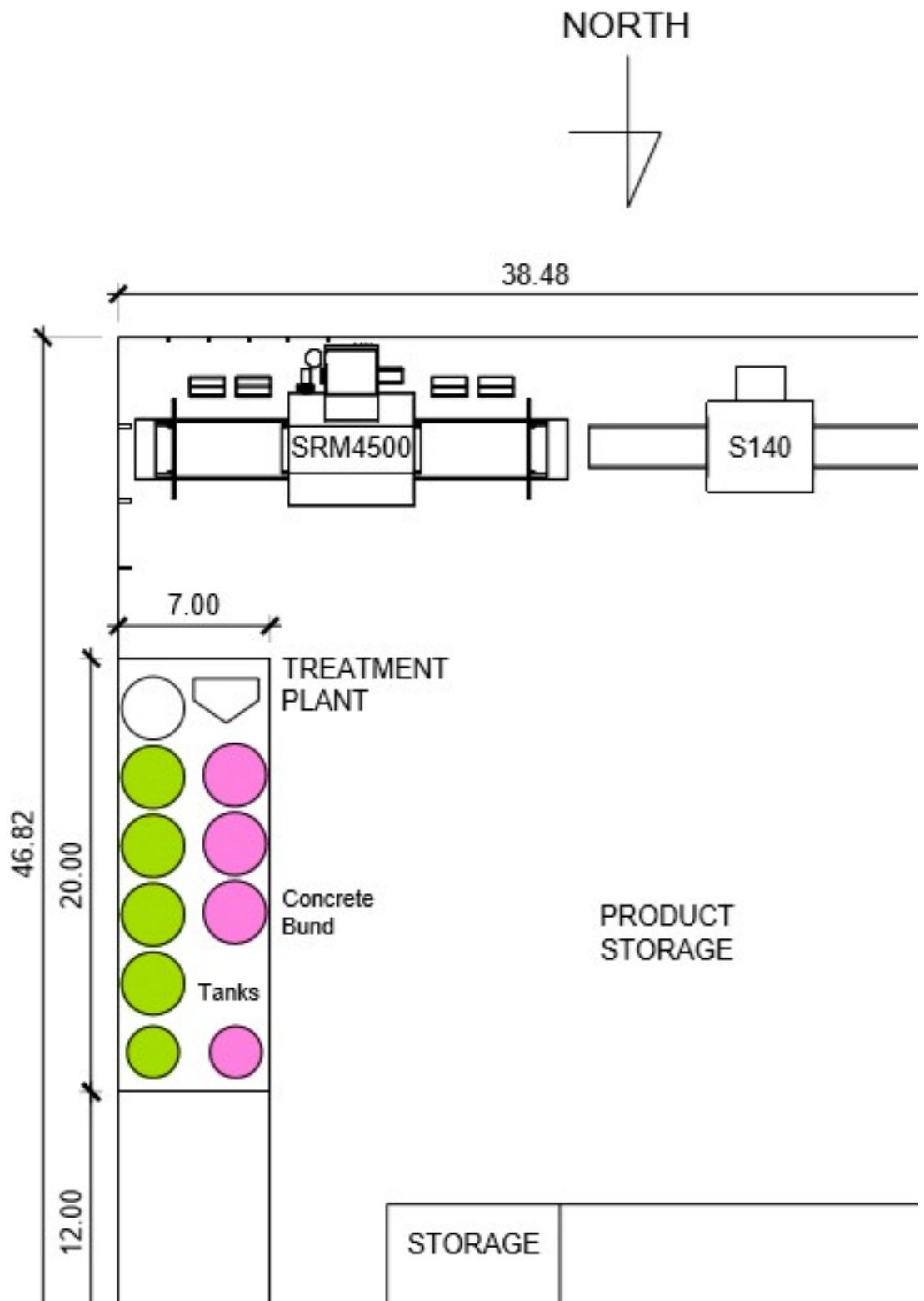


Figure 5.5 Proposed Site Layout



Figure 5.6 Granular Activated Carbon (GAC) Canisters for Air Filtration. Modular system allows all offensive gases to be scrubbed, and additional canisters installed if required.

5.3.2 Waste Disposal and Recycling

Currently the existing facility disposes of small volumes of packaging waste, oily rags, paper/cardboard recycling and general solid waste through segregated bins and a commercial waste disposal company.

The proposed changes will result in little change to existing waste management, except during construction when volumes will increase for a short period, and the treated product load-out and sewer discharge as described above.

5.3.3 Transport and Hours of Operation

Operations would be carried out 12 hours a day, Monday to Friday, fifty-two weeks per year. No works would be carried out on Saturdays and Sundays unless deemed an emergency. Core hours of deliveries/operation would be 4.00am to 4.00pm. Trucks would leave site from 4.00am to meet market requirements and avoid traffic congestion. Two operators would be employed, with one working from 4.00am to 2.00pm, and the second from 6.00am to 4.00pm.

IN1 Zoning allows for operation 24 hours a day with approval.

5.3.4 Costs, Funding and Staging

The projected capital cost for the proposed changes is \$750,000, and would generally comprise:

- Detailed design and procurement of key items of plant/equipment following planning consent;
- Construction of segregation wall and bunding, finished with an epoxy resin to ensure bund integrity;
- Installation of prefabricated tanks and equipment (e.g. scrubbers, screens and DAF);
- Installation of pipework, ducting, valves and controls, electrics, signage and fire safety equipment etc
- Commissioning, training, optimisation and revision of management plans.

The duration of construction is anticipated to be three months, followed by one month of commissioning and optimisation. Operations would commence only after the EPA Licence and Occupancy Certificate have been secured.

5.4 AUXILLIARY FACILITIES

No change in auxiliary features, such as electricity, gas or water or security will be required by the proposed changes. All unloading, treatment and load out would be carried out internally.

Stormwater will continue to be kept separate from process water and prevented from entering the sewer. All stormwater pits on the site are fitted with a strainer.

All water from the operations area would be contained within sumps within the bunded area. This would be treated through the DAF prior to sewer discharge. Discharge to Sydney Water's existing sewer, in compliance with trade waste agreement standards, will continue. The existing emergency and fire systems will be upgraded as required for the proposed changes.

6 EXISTING ENVIRONMENT AND IMPACT ASSESSMENT

6.1 LAND USE AND ENVIRONMENTAL SETTING

6.1.1 Existing land use

The Halgan site is Lot 603 DP 260618, 10 Davis Road, Wetherill Park NSW 2164. The Site is located in the Smithfield-Wetherill Park Industrial Estate, south of the Prospect Reservoir and bounded by Hassall Street, The Horsley Drive and Cowpasture Road. The Estate is described by Fairfield City Council as the largest industrial estate in the southern hemisphere, housing over 1,000 firms and employing 20,000 people (Fairfield Council, 2009).

The facility is surrounded by extensive light and heavy industry with immediate neighbours as follows:

- North – light industrial (equipment/cabinet manufacture and engine repairs)
- East – mixed transport, manufacturing storage and other businesses
- South – light and heavy industry
- West – light industrial (equipment/cabinet manufacture and engine repairs)

The nearest residential area is approximately 1.1 km to the south. A map of surrounding land uses is provided in **Figure 1.3**.

The site is zoned General Industrial Zone IN1 in accordance with *Fairfield Local Environment Plan (LEP) 2013*. As set out in Section 2.2., preliminary assessment concludes the proposal complies with the objectives and requirements of this zoning.

6.1.2 Construction impacts

No temporary or long-term construction impacts are anticipated due to the minor nature of alterations required.

6.1.3 Operational impacts

Potential impacts on surrounding land uses will be negligible but may result from the acceptance of liquid waste and the potential odour impacts from their handling at the Facility. Other minor impacts may include traffic, noise and water quality and these are discussed further in this Section.

The amenity for neighbouring properties may be impacted from potential odours from the site. As described in **Section 6.4** potential odour impacts will be managed to minimise odour at the source and off-site. As the proposed development changes will be undertaken within an established industrial estate, and based on the mitigation measures proposed, adverse impacts on the surrounding land uses are not anticipated.

6.2 WATER QUALITY, DRAINAGE AND SOILS

6.2.1 Existing Environment

The Site is located in the upper catchment for the Georges River, just south of the Prospect Reservoir. All driveways and working areas on the site are fully sealed. Surface water runoff from the driveways, parking area and roof are directed to the Council stormwater system.

All stormwater is directed to onsite sumps prior to discharge. Sumps are inspected and managed to ensure the site discharge is not contaminated. All stormwater drains on site will be fitted with strainers to remove larger waste that may have been

dropped on site.

Areas receiving and storing waste will be fully bunded. Treated liquid will be disposed in accordance with the Sydney Water Trade Waste Agreement, which includes routine testing and auditing of water prior to discharge.

As described above, all works will take place within a sealed bunded area. No excavation or other disturbance of the underlying soils is required.

6.2.2 Construction impacts

The installation of the containment wall, storage tanks and plant would have negligible, if any, impact on the existing water cycle or receiving waters.

6.2.3 Operation impacts

Operational impacts from the acceptance and storage of liquid waste are considered to be negligible. All handling and transfer of waste will take place within a bunded, impermeable area.

There will be no change to the stormwater drainage system.

6.3 BIODIVERSITY

6.3.1 Existing flora and fauna

The site has been heavily modified by industrial use. Few trees or shrubs are present, and the majority of the site is hardstand. There are several hardy eucalypts (Sydney bluegum) and callistemon (bottlebrush) on the verge and within the perimeter of the site which will be protected and maintained. There is limited flora and fauna resources on the site and its immediate surroundings, with very little potential habitat. A NSW Bionet Atlas Search has indicated no listed threatened species in the immediate vicinity (refer Appendix E).

6.3.2 Construction impacts

The proposed development area consists of internal alterations to an existing structure which has no impact on any flora or fauna species. No excavation or vegetation clearing is required.

6.3.3 Operation impacts

There will be no additional impacts during the operational phase.

A Biodiversity Development Assessment Report Waiver Application is included in Appendix E.

6.4 AIR QUALITY (DUST & ODOUR)

6.4.1 Existing air quality

Air quality in the locality is typical of industrial areas, with adverse impacts from heavy traffic and industry.

6.4.2 Construction impacts

Installation of the containment walls, bunding, tanks, pipework and equipment would have negligible temporary impacts as this would entail placement of prefabricated panels and tanks etc. If required, damping down of the work area will be carried out to suppress nuisance dust.

6.4.3 Operation impacts

Odour impact assessment would be carried out by an established specialist in accordance with Council, and NSW EPA and requirements and standards. This will guide the design, equipment selection and operation of the proposed operation. As the material to be treated is liquid, there will be no dust or particulate matter generated.

No adverse air quality impacts are anticipated from the receipt, storage and treatment and load out of liquid waste.

6.4.4 Mitigation measures

- Installation and operation of scrubber system;
- Segregated area to be kept under negative pressure with all air scrubbed prior to atmospheric discharge;
- Design and stringent housekeeping regime, subject to inspection and audit;
- Roller doors closed during unloading and operation;
- Waste transferred regularly to reduce volumes and risk of fugitive emissions;
- Vector/pest control program to be implemented.
- Good neighbour program, monitoring and contact management program to be implemented.

6.5 NOISE & VIBRATION

6.5.1 Existing Acoustic Environment

The Smithfield-Wetherill Park Industrial Estate hosts a range of heavy industries that operate 24 hours a day. The Halgan Site is similarly able to operate 24 hours a day, subject to Consent. In addition, transport of goods and materials would be scheduled outside normal working hours where possible to avoid congestion.

Background noise in the area is associated with traffic, including a high portion of heavy vehicle movements, and surrounding industrial operations.

6.5.2 Noise Impact Assessment

A noise impact statement will be carried out. Based on similar operations, the noise generated by truck traffic unloading and loading liquid waste is not considered likely to impact on neighbouring land users. The acceptance and handling of liquid waste at the site are not anticipated to generate additional noise.

Operational noise is not considered likely to have any significant impact on adjoining businesses or residential areas as the proposal does not include the installation of any significant noise generating plant or equipment.

6.5.3 Conclusion

It is therefore concluded that the acceptance of liquid waste would not have a significant noise impact on adjoining neighbours or the nearest residences.

6.6 TRAFFIC, ACCESS & PARKING

6.6.1 Existing traffic and road network

6.6.1.1 Traffic and Access

The main purpose of the Wetherill Park Industrial Precinct is to concentrate heavy vehicle movements and deliver them to an appropriate intersection within the regional road network. The location of the site is well serviced by a number of arterial roads including The Horsley Drive to the south, The Cumberland Highway to the east, the Great Western Highway to the north and Westlink M7 to the west.

Streets within the Industrial Estate have been designed specifically to cater for the movement of heavy vehicles within an industrial area. As such, they provide wide carriageways with lay-bys and turning areas sufficient for vehicles to enter all adjacent sites. Davis Road experiences constant traffic flows over extended operating periods.

The primary access road to the Halgan facility is directly from Davis Road via a wide driveway, with contingency egress to Elizabeth Street.

6.6.1.2 Parking

Parking on the Halgan Site is approved for twenty-six cars, which exceeds requirements for the existing manufacturing, administration and proposed changes. Floor space of the site will not be altered by the proposal.

Parking will be reviewed during the EIS process to verify compliance with statutory and Council's DCP requirements. Swept path analysis will be carried out.

6.6.2 Construction Impacts

Traffic impacts from the minor construction works are anticipated to be negligible.

6.6.3 Operation Impacts

The proposed changes are not likely to have a material impact on traffic flows on- and off-site. Ample parking exists on site, and will be verified.

There will be no impact on any residential streets as a result of the proposal.

A traffic, access and parking study will be carried out, including internal site manoeuvrability (swept path analysis).

6.7 HERITAGE

6.7.1 Existing setting

A search of the relevant registers and visual inspection of the site indicates that there are no heritage items of conservation value. A number of items associated with Prospect Reservoir were identified in the wider vicinity however these would not be impacted by the works.

A search of the NSW Office of Environment and Heritage AHIMS (Aboriginal Heritage Information Management System register on 19 November 2019 indicated that there were no registered sites or relics on, or in the immediate vicinity of, the property (refer Appendix F).

6.7.2 Construction impacts

No impacts from the installation of the works are anticipated on any indigenous or non-indigenous heritage items.

6.7.3 Operation impacts

The operational phase of accepting liquid waste would have no impact on heritage items or places in the vicinity.

NSW DPIE Aboriginal Cultural Heritage Impact Assessment Guidelines sets out the requirements for assessing potential impacts on Aboriginal cultural heritage for applications for consent or approval for SSD. The proposed works have been considered in accordance with the DPIE Guidelines and the following OEH guidance:

- Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010)
- Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (OEH 2011)
- Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010)

The applicant seeks an exemption from the requirements to carry out an Aboriginal Cultural Heritage Impact Assessment (ACHAR) because:

- the site has been highly modified by past use;
- the proposed works do not entail excavation or disturbing the ground surface of the site;
- the proposed works entail development of an existing building or structure that does not exceed the current building footprint;
- A recent AHIMS search indicated that there were no registered relics or sites in the vicinity of the property.

Therefore, it is considered unlikely that any items of indigenous heritage would be present, and an ACHAR waiver is sought.

6.8 VISUAL AMENITY, SOCIAL AND COMMUNITY ASSESSMENT

6.8.1 Existing scenic condition and local character

The Smithfield-Wetherill Park Industrial Estate is characterised by industrial buildings and associated structures ranging from processing and manufacturing plants, wholesale, transport and service firms. 10 Davis Road consists of paved parking and driveway areas and a large utilitarian building with associated office and meeting room areas. Small landscaped areas are located between the driveway apron and north-western perimeter fence.

The Facility has street frontage to Davis Road and Elizabeth Street, consisting of the wide driveways and verges with some remnant eucalypts.

No adjacent land uses will be able to directly view the proposed operations, as they will be carried out within the existing building.

The nearest residential areas are located across approximately 1.1 km from the site and have no direct view of the site. 10 Davis Road is located within an industrial precinct away from residential and recreational activity areas.

6.8.2 Visual impact assessment

As the proposal will not alter the existing building or site layout the visual amenity of the area will not be impacted.

The proposed development will have no visual effect on neighbouring buildings.

6.8.3 Construction Impacts

Construction will have negligible impact on the surrounding properties and is compatible with the adjacent industrial land uses. The proposed development is not anticipated to have any detrimental impact on social amenity.

6.8.4 Operational Impacts

The proposed development is consistent with State and Regional planning instruments, and will facilitate an increase in recycling and beneficial reuse of waste. Subject to careful design, equipment selection, effective operation, maintenance and housekeeping, there are not anticipated to be any adverse impacts on visual and public amenity.

6.9 PUBLIC HEALTH & SAFETY

6.9.1 Introduction

The management of waste streams from collection through to beneficial reuse or disposal requires consideration so that appropriate design and safeguards are implemented to prevent public health and occupational health and safety risks.

The acceptance of liquid waste to the Site at 10 Davis Road Facility will not pose any potential issue for public health and safety.

6.9.2 Overview of Potential Public Health Risks Associated with the acceptance of Liquid Waste

In consideration of this proposal and experience with existing similar facilities, the following potential public health risks have been identified to be managed with respect to the construction and operation of the proposed development:

Operational Risks

- unloading, handling and storage on site;
- airborne emissions from waste handling – odour, dust and airborne pathogens;
- stormwater management;
- wastewater management;
- control of vermin and insect pests;
- security.

Experience operating with liquid waste at other facilities, such as existing plants in Wetherill Park and the broader Sydney area, demonstrates that these should be no potential chronic or acute health risks associated with a well-managed process.

The following table outlines the measures designed to mitigate health risks associated with the proposal:

Table 6.1: Design and management of exposure risks to human health

Aspect of Operation	Nature of Risk	Potential Exposure Pathway	Proposed Safeguards
Operation			
Waste collection and transport to and from site	Traffic hazards and exposure to wastes	Traffic accidents, inhalation and physical contact with wastes	<ul style="list-style-type: none">▪ Wastes transported in enclosed tanker trucks▪ Compliance with EPA and WasteSafe tracking system as required.▪ Training in appropriate procedures

Aspect of Operation	Nature of Risk	Potential Exposure Pathway	Proposed Safeguards
			provided to operators and truck drivers, including emergency and spill response
Unloading, handling and storage on site	Exposure to waste-related pathogens and attraction of insects and vermin	Inhalation and physical contact with wastes. Secondary impacts through pathogen-spreading vectors such as insects and vermin	<ul style="list-style-type: none"> ▪ Products transferred as soon as possible (generally 12-hour turn over max 24-hour residence time) ▪ Unloading via vacuum. Receiving bays and storage areas designed to be well ventilated, contained with bunds in accordance with NSW EPA and WorkCover requirements, and secure from vermin and insect pests ▪ Internal liquid transfer via hard plumbed pipework ▪ Areas maintained with best practice housekeeping standards ▪ Training of operators in waste handling and emergency and spill response procedures ▪ Liquid wastes to be kept separate from other waste types
Wastewater management	Exposure to waterborne pathogens	Physical contact	<ul style="list-style-type: none"> ▪ All wastewater to be discharged to Sydney Water sewer via hard plumbed pipework
Stormwater management	Contamination	Physical contact	<ul style="list-style-type: none"> ▪ Prevention of stormwater entering process and handling areas through use of roofs and bunds.
General traffic and road safety	Traffic hazards and exposure to wastes	Traffic accidents and physical contact with waste	<ul style="list-style-type: none"> ▪ Training in appropriate procedures provided to operators and truck drivers, including emergency and spill response ▪ Transport by enclosed, suitable trucks ▪ Clear signage around site to define what traffic is permitted in what areas on site
Control of vermin and insect pests	Exposure to vector-related pathogens	Physical contact	<ul style="list-style-type: none"> ▪ Comprehensive vector and pest program e.g. use of rodent traps at appropriate locations in storage areas, regular inspections and audits. ▪ Design incorporating proper site drainage to prevent stagnant wet areas that attract mosquitoes and other insect pests
Security	Public access to site	Accidents and physical contact with wastes	<ul style="list-style-type: none"> ▪ Restricted public access ▪ Site bounded by appropriate security fences, with 24-hour security patrols and 24hr camera ▪ Warning signs displayed at appropriate locations around site

Vector control will be paramount to the proposal, and will include:

- Training of all staff in correct handling, use of appropriate PPE, and control of vectors;
- Use of professional pest control contractors and systems as appropriate (e.g. Rentokill or similar) to eliminate insects and rodents etc;
- Rigorous monitoring and auditing of the effectiveness of the above controls;

- Inspections and learnings from many other waste treatment facilities.

Potential public health implications for the proposed development are further reduced by the position of the Facility within an industrial precinct, which is located more than 1km from the nearest residential area. The material would be delivered in enclosed tankers and treatment process fully automated and enclosed under air quality control systems.

The adjacent premises are occupied by industrial businesses (e.g. transport, manufacturing), at adequate separation distances from the site. There are no recreational areas nearby and the access roads are seldom used by the public.

6.9.3 Conclusion

The results of this preliminary health impact assessment indicate that public and occupational health and safety risks associated with the proposed changes will be negligible if the safeguards outlined above are implemented. As well as complying with stringent OHS guidelines, Halgan will implement an Occupational Health and Safety Management System, certified to AS 4801 (and an Environmental Management System in accordance with ISO-14001). Halgan's Environment, Quality and Safety Department are responsible for the maintenance and auditing of these systems with the facility operation and maintenance teams.

6.10 WASTE, ENERGY & RESOURCES

6.10.1 Energy Use

The existing facility has a power consumption of approximately 80 - 100kWh per month, which would be expected to increase by less than 10% as a result of the proposed changes. Installation of a solar photo-voltaic rooftop system would be investigated to reduce energy consumption and greenhouse gases.

Trucks use diesel fuel, with diesel and increasingly electric powered plant used for transporting materials around the site. The administration facilities and amenities require electricity.

6.10.2 Waste Generation

Halgan has a comprehensive waste management system in place with transport off-site by a commercial provider. The proposed changes will not substantially alter the waste types and recovery processes.

The proposed changes to the facility would see the acceptance of up to 50,000 tpa of liquid waste, with treated residue transported off-site for beneficial reuse, and treated water discharged to sewer in accordance with the Sydney Water Trade Waste Agreement. Liquid waste would be treated in accordance with NSW EPA Resource Recovery Orders (RRO).

The proposed changes to the Facility are an important component of sustainable waste management through resource recovery.

6.10.3 Construction and Operations Impacts

Construction waste impacts are anticipated to be negligible. A waste management plan would be prepared.

The acceptance and treatment of liquid waste would see additional wastes diverted from sewer to be beneficially reused for land application, recycling or similar.

6.10.4 Mitigation Measures

- Records shall be maintained of each load of waste entering the premises, including the identification of the vehicle, weight, nature and origin of waste received, and how it was contained
- Waste transporters will continue to undergo an induction process and attend continuing information courses on waste types permitted to be received
- Any wastes generated on the site will be recycled wherever possible
- Wastewater generated on site to be treated and then disposed to sewer.

6.11 ECONOMIC & FINANCIAL ASSESSMENT

6.11.1 Existing environment

The Facility is located in the Smithfield-Wetherill Park Industrial Estate which is one of Sydney's significant industrial hubs and an important economic and employment centre within the City of Fairfield. The site is strategically located between growth areas and major populations in the north-west and south-west of Sydney (Fairfield Council, 2009). The area has a wide range of productive industries and supporting services.

One of the key objectives of *Fairfield City Wide DCP (2013)* is to encourage and reinforce recycling and waste management principles. The proposed development meets both these principles by allowing Halgan to stay economically competitive, meeting the needs of a changing waste market, while providing a service that is central to waste management and recycling policies.

6.11.2 Impact Assessment

6.11.2.1 Financial Assessment

As described in **Section 4**, the proposed changes will allow Halgan to meet growing and changing market needs, better servicing both commercial and industrial sectors. The existing Facility at 10 Davis Road is considered most suitable for these activities because of the following:

- The site is compatible with adjacent industrial land uses and has limited application for other types of industry;
- Enables re-use of existing plant, equipment and site facilities;
- Is centrally located and close to arterial roads to decrease transport costs and time;
- Enables generation of beneficial products for recycling and agricultural benefit
- Provides benefits to industrial and commercial clients through effective management of waste products.

The financial benefits outlined above justify Halgan's investment to make the proposed changes.

6.11.2.2 Economic Assessment

Consistent with the principles of ESD, the economic evaluation compares environmental and social costs and benefits of the project in an economic context. The proposed development will have the following benefits:

- Reduction in environmental risks associated with unlawful liquid waste discharge to the sewer system and ultimately to receiving waters;
- Recycling benefit to the wider Sydney metropolitan area via commercial and

industrial clients and production of useful by-products for agricultural or industrial purposes

Consistent with the objectives of Fairfield LEP (2013) and Fairfield City Wide DCP (2013), the proposed development will complement the existing industries in the Smithfield-Wetherill Park Industrial Estate.

6.11.3 Conclusion

The proposed changes represent the optimal financial option for Halgan Liquid Waste. By improving their resource recovery capability, the proposed changes will improve Halgan's competitiveness, with positive economic implications for the local and wider Sydney economy. The economic benefits outlined above indicate that the proposal represents a desirable course of action for the community of Sydney as a whole.

6.12 HAZARD & RISK ASSESSMENT

6.12.1 Introduction

A review of items covered under SEPP 33 will be carried out for this proposal using *Applying SEPP 33 Hazardous and Offensive Development Application Guidelines*. This will assess primarily liquid waste receipt, storage, treatment and load-out, and manufacturing operations.

Management systems, including neighbour and emergency response plans, will be documented and submitted to incorporate all findings. This will mitigate against any possible issues associated with the proposed changes to the Facility. The proposed changes are not anticipated to substantially change the risks and hazards associated with the site. Preliminary risks associated with public and worker health and safety has been detailed in **Section 6.9**.

6.12.2 Offensive development evaluation

The acceptance of liquid waste at the Facility has the potential to cause odour at the site, which may be considered offensive although negligible. As discussed in **Section 6.4**, air quality assessment and modelling will be carried out, and is anticipated that, with appropriate design, treatment, operation and maintenance, odour impacts from the proposed changes are expected to be negligible.

Additionally an Environment Protection Licence will need to be sought from NSW EPA to accept liquid waste at the Facility, ensuring appropriate control and regulation of activities at the site.

6.12.3 Risk management safeguards to be mitigated through the EMS

The main potential for impacts associated with the operation of the proposal on the environment and neighbouring land uses is air quality (odours) from handling liquid waste.

Air quality impacts are considered likely to be negligible with the proposed controls, facility design, operational scheduling, and implementation of Halgan's environmental management system. The facility will continue to be supervised continuously, audited regularly, and subject to an extensive range of monitoring procedures. Incident management and emergency response procedures will be implemented. Halgan has a proud environmental and "good neighbour" record, and its Australian operations are in general accordance with ISO-14001 Environmental Management Systems.

Identification of hazards associated with the proposed developments to the Halgan facility will be reflected in an updated EMS.

Further, public health and safety, and the occupational amenity of neighbouring land

uses, are not likely to be impacted by vectors due to extensive and rigorous controls as described in **Section 6.9**.

6.13 CUMULATIVE IMPACTS

No substantial cumulative impacts have been identified for the proposed changes.

The proposed changes to the existing facility will not result in any material change to traffic flows. Water quality changes are also considered negligible. Air quality impact assessment concludes that, with the proposed mitigation measures set out in this Scoping Report, there will be negligible odour impacts on neighbouring land uses.

By providing a capability to safely accept, transfer and recycle/beneficially reuse liquid waste, it is considered that the risk of poor management and disposal practices (i.e. discharge to sewer or stormwater) will be reduced, along with the reduction in total cost to customers, and improved waste management for the local community and the broader city of Sydney.

7 ENVIRONMENTAL AND OPERATIONAL MANAGEMENT SYSTEMS AND PLANS

7.1 MANAGEMENT SYSTEMS

Halgan's existing environmental and occupational health and safety management systems keep abreast of legislative changes, governmental regulations and changes to market conditions. Risk prevention remains a priority, with an internal audit system used to check the reliability of the facilities.

Halgan has been established for over twenty years, and is proud of its record as being a good neighbour and promoting environmentally sustainable development. Halgan's environmental management system is in general accordance with ISO-14000 and ISO-9000 Series requirements. Halgan also has AS-4801 accreditation for their occupational health and safety system.

This section describes the environmental and operational management systems and plans for the Halgan waste recycling facility, including the outline environmental management plan (EMP) operation of the proposed development; training, monitoring, auditing and reporting requirements; outline plans for incident management; and a summary of mitigation measures during all phases of the proposed development.

7.2 ENVIRONMENTAL MANAGEMENT PLANS

7.2.1 Construction environmental management plan

The proposed construction works is confirmed to a small area and relatively straightforward. A CEMP will be prepared for this phase of works, and will require approval by the Certifier prior to the Construction Certificate being issued.

7.2.2 Operational environmental management

Halgan will update the EMS, where required, to include additional operational safeguards for the acceptance of new liquid waste streams. In particular the operational management will address health, safety and environmental issues associated with acceptance of liquid waste. All environmental management operational procedures will be in general accordance with ISO-14001 and AS4801.

Operational management will outline safety training requirements for employees and detail precautionary measures to be undertaken when working in hazardous conditions.

The EMS will be reviewed annually and will incorporate the result of any monitoring undertaken in the previous year.

7.3 INCIDENT MANAGEMENT PLAN

The incident management plan will be updated to include specific actions that may relate to handling and transfer of liquid waste. The Fire Safety Schedule will be updated. Liaison with NSW Fire and Rescue (local Brigade) will be carried out during detailed design to confirm and document first-response and emergency management requirements.

LIST OF APPENDICES

- Appendix A Certificate of Title
- Appendix B S149 Certificate
- Appendix C Existing Development Consent
- Appendix D Fairfield City Council Meeting Minutes (8 October 2019)
- Appendix E Biodiversity Development Assessment Waiver Application
- Appendix F NSW OEH AHIMS Search Results