Proposed Amplification of Liquid Waste Treatment Facility

10 Davis Road, Wetherill Park

Halgan Liquid Waste Solutions

Secretary's Environmental Assessment Requirements: Scoping Report

September 2023

halgan pty ltd

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SUMMARY

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

Halgan currently accepts and treats grease trap waste tpa (K110) at the facility in accordance with NSW Environment Protection Authority (EPA) Licence No. 21629, with planning consent for 50,000 tonnes per annum (tpa) of grease trap waste (DA 286.1/2020). Halgan is proposing to seek approval for a total annual volume of 120,000 tpa of liquid waste, comprising the existing approved 50,000 tpa of grease trap waste, and up to 70,000 tpa combination of industrial and other liquid waste streams.

Strategic Context

Liquid waste streams are generated in construction and commercial/industrial sites. Halgan will treat and concentrate the oils and contaminants for transport to specialist disposal solutions or recyclers for reuse.

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.

Background and Current Site Operations

Halgan is an established Australian company with a strong market presence manufacturing and serving wastewater treatment equipment. Since 2022 Halgan Liquid Waste (ABN 69 064 448 157) has been successfully accepting and treating grease trap waste at its facility at 10 Davis Road Wetherill Park.

The 3820 square metre (sqm) site (Lot 603/260618) is located in a Zone E4 General Industrial area, and ideally located near major arterial roads - Elizabeth Drive and Reconciliation Road. The site has two driveways enabling all deliveries to enter and exit on a forward direction, 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 activities on a 24/7 basis, provided they 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 of liquid waste are carried out within the building. Operations are primarily from 4am to 6pm Monday to Saturday, with Council planning consent for operations 24/7, 52 weeks per year, in order to cater for emergency contingencies and ameliorate traffic congestion.

Operations generate negligible noise or air emissions beyond the site with effective treatment and mitigation. Unloading operations are carried out within a bunded, confined area and treatment is carried out within an area maintaining best practice odour control, with a best-practice carbon odour control system discharging extracted and treated air to the atmosphere. Air quality, noise mitigation and water containment/quality controls will be extended and continued.

The existing building is well-suited to the proposed treatment operations. Industry best-practice facilities comprise automated roller-doors, solid internal walls, bunds, storage tanks and physical separation tanks, full automation, and activated carbon air treatment.

In the two years of great trap waste treatment operations, there has been no complaints or non-compliances, and full compliance with planning consent, EPA Licence and Sydney Water discharge requirements.

Project Description

Halgan is proposing to seek approval for an additional 70,000 tpa of industrial and other liquid waste streams, comprising the following waste streams/codes:

Industrial liquid wastes & Source	**NEPM Code***
Fire debris and fire wash waters: Water used in the control of property fires etc.	N140
Waste mineral oils unfit for their original intended use: Used mineral oil suitable for recycling	J100
Waste oil/water, hydrocarbon/water mixtures, emulsions: Wastewater generated from the auto industry etc.	J120
Groundwaters, waste waters / leachate: Water generated from weather events	Z140
Industrial wash waters: Wash waters resulting from wash down liquid during production shut downs etc.	N205
Product destruction: Packaged liquid food waste unfit for purpose Liquid to be treated and packaging diverted to recycling facilities	N/A
Food waste (liquid): Residual/ wash down liquid waste from food processing facilities	N/A
Inks /dyes: Wash water from production such as material dye etc.	F100
Drilling mud and/or muddy water from drilling operations: Drill mud from excavation of VENM soil	N/A

*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).

In accordance with the NSW EPA requirements for industrial liquids, all waste must be pre-determined at the source by a NATA-approved facility to identify the actual contaminant within the waste liquid. Suitability for treatment will be verified by Halgan prior to acceptance at the Facility.

Treated water would continue to be discharged to sewer in accordance with the Sydney Water Source Control Agreement. Other residual material would be transported off site to approved organic reuse, recycling or disposal facilities.

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

Approximately sixteen (16) staff will be employed in total, with six (6) dedicated to the liquid waste operations, and the remainder in administration and sales. 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 continue to be used for office requirements and amenities. All treated water will be discharged via a Sydney Water Trade Waste Agreement.

Statutory Context

The site is zoned E4 - General Industrial and leased on a long term (5+5 year) basis. The site has a current Consent (DA 286.1/2020).

Halgan anticipates volumes of liquid waste to be treated of up to 120,000 tpa of liquid industrial waste (including the previously approved 50,000 tpa of grease trap waste) water within five years of approval.

Schedule 3 of the *Environmental Planning and Assessment Regulation 2021* sets out the criteria for Designated Development. Part 2, Section 45 applies to Waste Management Facilities or Works, and states that "*development for the purposes of a waste management facility or works that purify, recover, reprocess or process more than 5,000 tonnes per year of solid or liquid organic materials*" is defined as designated development, and an Environmental Impact Statement (EIS) must be prepared.

The amplification proposal is also defined as State Significant Development (SSD), as it exceeds the threshold in Schedule 1, Section 23 (6), of the State Environmental Planning Policy (Planning Systems) 2021. The Minister for Planning (or their delegate) determines development applications for SSD under Part 4 of the EP&A Act. The proposed amplification will be defined as integrated development, and a licence amendment will be required from NSW EPA.

Assessment

Environmental risk assessment has been carried out for operation of the proposed development. The following cumulative 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 have been carried out, and will be updated to manage risk to operations, access, adjoining properties etc. An updated, cumulative Flood Risk Study and Management Plan will be prepared as required by Development Control Plan (DCP).

Key operational documents will be updated and provided, including Fire Safety Schedule, Operational and Environmental Management Plans, Emergency Management Plan and consultation/approvals for works from utilities including Transgrid and Sydney Water (if required).

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 Pty Ltd (Halgan) for the proposed amplification of the 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.

Halgan operates a liquid grease trap waste treatment facility at 10 Davis Road Wetherill Park. The consent (286.1/2020) permits treatment of 50,000 tonnes per annum (tpa) liquid grease trap waste (K110) within the existing building. Treated residues are transported off-site to approved organic reuse or recycling facilities.

Unloading, treatment and load-out are carried out within the building. Operations are primarily from 4am to 4pm Monday to Friday, although approval exists for 24/7, 52 weeks per year in order to cater for industry requirements. In the two years of operations, Halgan has successfully operated in full compliance with all planning consent, Sydney Water discharge licence, and NSW Environment Protection Authority (EPA) Licence No. 21629 requirements.

Figure 1.1 shows the location of the site.

FIGURE 1.1: Site Location

1.2 OUTLINE OF THE PROPOSAL

Halgan proposes to seek approval for an additional 70,000 tpa of liquid waste for treatment, comprising a range of liquid waste streams. Additional treatment units and processes would be installed, and controls measures (air treatment, wastewater treatment etc) would be amplified. The Facility has ample space and parking for the proposed amplification.

Operations would continue to generate negligible noise or air emissions beyond the site with effective treatment and mitigation. All unloading and treatment operations would continue to be carried out within the existing building and in bunded, confined areas with managed ventilation, with an upgraded, best-practice odour control 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 bunds, installation of storage tanks and physical separation treatment, upgrading the air quality treatment system, additional pipework/storage tanks, electrical/control systems, and commissioning.

Approximately sixteen (16) staff will be employed, including administration and sales staff. Existing facilities would be used for office requirements and amenities. 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. Treated water will be discharged to sewer in accordance with a Sydney Water Trade Waste Agreement.

The Wetherill Park industrial area is well suited and zoned for appropriate development of this nature. Future development in the area will be monitored during the assessment phase, however there is no known development, at this time, that would conflict with, or increase the cumulative impacts of, this proposal.

1.2.1 The Proponent

The proponent is Halgan Liquid Waste Pty Ltd (Halgan, ABN 69 064 448 157), 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 generation of liquid waste streams, has resulted in an increase in the volume and nature of liquid waste. Despite the increase in liquid waste generation, treatment capacity is constrained. Sydney Water continues to tighten and regulate discharges to sewer, and generators seek convenient, affordable and sustainable disposal and reuse solutions. 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.

Liquid waste streams are generated in construction and commercial/industrial sites. Halgan will treat and concentrate the oils and contaminants, for transport to specialist disposal solutions or recyclers for reuse.

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

The proposed development is described in detail in **Section 3** of this Report.

1.2.3 Project Schedule

Subject to planning and other approvals, additional construction and installation of the plant and equipment would be carried out over a six-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 amended NSW EPA Licence No. 21629.

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 STATUTORY CONTEXT

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

The proposal will also be State Significant Development. This requires that Halgan seek Secretary Environmental Assessment Requirements (SEARs) from DPE to set out the requirements of the Environmental Impact Statement (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). An amendment to Licence No. 21629 from NSW 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, any other nearby development, and all relevant policies and statutory instruments.

2 STRATEGIC CONTEXT

2.1 NEED FOR THE PROPOSAL

2.1.1 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.

2.1.2 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.

The proposal aligns with NSW Government Waste Avoidance and Sustainable Material Strategy 2041 which takes into account the potential resource value and future use of materials in accordance with ecologically sustainable development (ESD) principles.

The site at 10 Davis Rd is considered appropriate as it has the following characteristics:

- Appropriate zoning (E4-General Industrial);
- Appropriate and tested 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 sources and 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*'.

2.1.3 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 treat and recycle all their wastes safely in an easily accessible and environmentally-friendly facility. Recovered material can then be re-used for beneficial industrial and agricultural purposes.

2.1.4 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.

2.2 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 liquid 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/oil recovery) would be constrained;
- The effective management and 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.

3 PROJECT DESCRIPTION

3.1 SITE LOCATION, LAND OWNERSHIP AND SURROUNDINGS

The Liquid Waste Facility 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. The Estate 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. Reconciliation Drive provides access to the M4 Motorway.

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 would only be required for transport of plant into the site during the construction phase.

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

Figure 3.1, 3.2 and **3.3** 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 3.1: Aerial of Site (Existing)

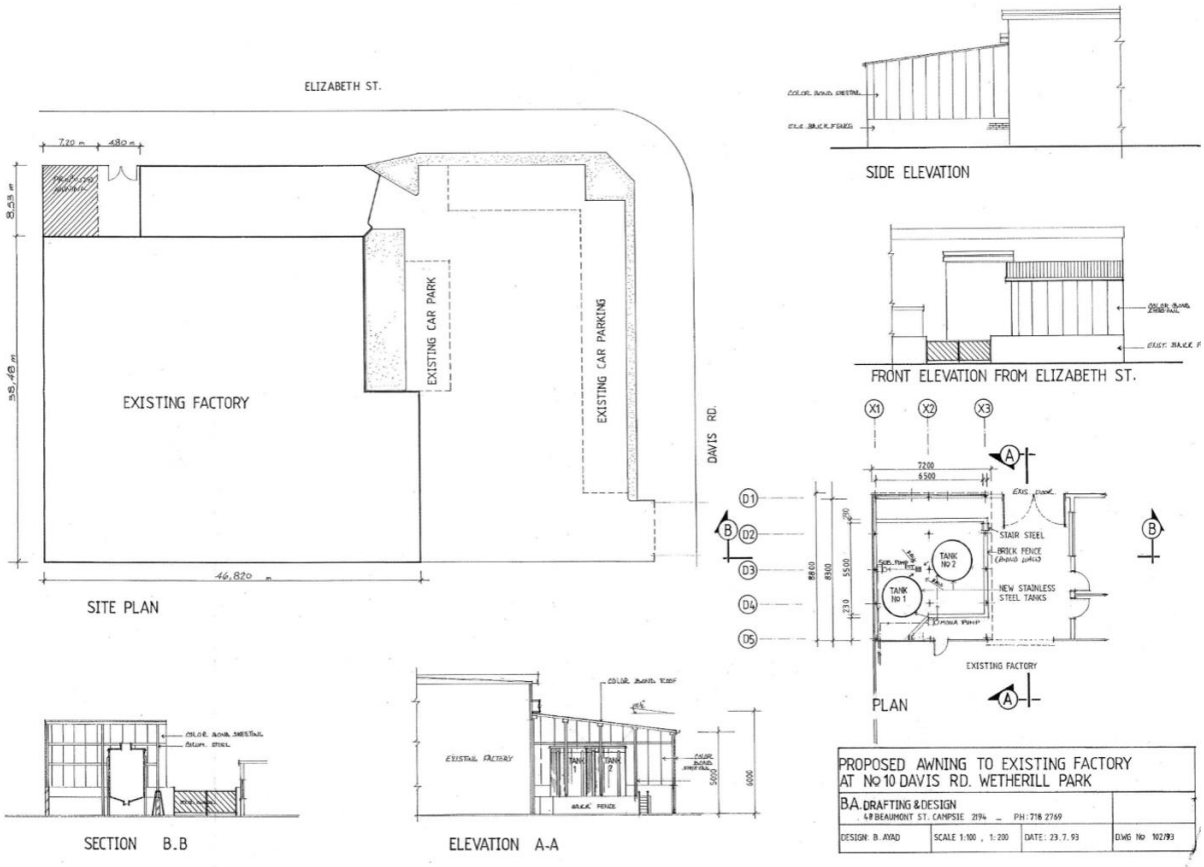

Figure 3.2: Site Plan (Existing)

3.2 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, with loading/unloading within the building, and egress to Elizabeth Street. There is a wide grassed verge on the western and northern frontages, with several established native street trees which will not be impacted by works and operation within the building.

The existing building is well suited to 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. The floor slab of the building is designed to capture all spillages. Suitable fire protection has been installed which is inspected and certified annually.

Office facilities comprise approximately 260 sqm, consisting of an adjacent ground-floor administration office, and a mezzanine office overlooking the operational area. No change is proposed or required to the offices or amenities.

Vehicle parking consists of 26 spaces on the concrete apron fronting the building, which are suitable for both light and heavy vehicles. Line marking, flood mitigation controls and signage was carried out in 2021 to Council's DCP and DA requirements, and no additional changes are anticipated.

Figure 3.4 Collection Vacuum Tanker (Grease Trap Waste)

3.3 PROPOSED FACILITIES AND PROCESSES

The proposal comprises the capacity to accept, store and treat:

- Treatment of 50,000 tpa of liquid grease trap waste (K110), as approved within the existing building; and
- Up to 70,000 tpa of various liquid waste streams as set out in **Table 3.1**.

The new proposal will be separate from the existing Grease Trap Treatment facility.

Residual waste would be transported off site to approved organic reuse or recycling facilities. Treated water would continue to be discharged to sewer in accordance with Sydney water Trade Waste Licence.

3.3.1 Liquid Treatment Waste Process

The dedicated treatment area, shown in **Figure 3.5**, will require additional receival, storage and treatment facilities to be installed so that liquid waste streams can be completely separated. This is required to prevent any risk of cross-contamination of the waste streams.

Industrial liquid wastes, up to a limit of 70,000 tpa, would comprise the streams as set out in **Table 3.1** below:

Industrial liquid wastes & Source	**NEPM Code***
Fire debris and fire wash waters: Water used in the control of property fires etc.	N140
Waste mineral oils unfit for their original intended use: Used mineral oil suitable for recycling	J100
Waste oil/water, hydrocarbon/water mixtures, emulsions: Waste water generated from the auto industry etc.	J120
Groundwaters, waste waters / leachate: Water generated from weather events	Z140
Industrial wash waters: Wash waters resulting from wash down liquid during production shut downs etc.	N205
Product destruction: Packaged liquid food waste unfit for purpose Liquid to be treated and packaging diverted to recycling facilities	N/A
Food waste (liquid): Residual/ wash down liquid waste from food processing facilities	N/A
Inks /dyes: Wash water from production such as material dye etc.	F100
Drilling mud and/or muddy water from drilling operations: Drill mud from excavation of VENM soil	N/A

*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).

The transport, handling and treatment process would entail:

- All waste must be pre-determined at the source by a NATA-approved laboratory to identify the actual contaminant within the waste liquid In accordance with the NSW EPA requirements for industrial liquids. Suitability for treatment will be verified by Halgan prior to acceptance at the Facility. Once the waste is analysed, and deemed appropriate for treatment by Halgan, a unique tracking number will be assigned. This is an identification number used by the generator of the waste, the transporter, and the receiving treatment facility.
- 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 contractors, businesses and industries. 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.
- Tankers would enter the yard in the forward direction by the main Davis Road

entrance then the roller door into a bunded unloading bay within the 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;

- All waste will be received and recorded over a calibrated and certified weighbridge. Samples of received industrial waste will be stored for further testing if required.
- The vehicle will then be directed to the appropriate unloading area. The waste will be emptied from the truck by gravity and positive displacement pumps, with no vacuum transfer used within the facility. All receival and storage tanks would be hard-plumped 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 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.
- Operator will activate the automated lock out system depending on the waste stream. Tankers will discharge through a primary screening mechanism into receival tanks, which will electronically record loads and volumes. The primary screens will remove any gross solids and contamination, with air ducted to the air quality control system;
- 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.
- Waste consisting of "oil" will be settled for a predetermined time to allow the oil to separate from the water phase. Oily water will 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 with final treatment via a biological process and discharged to the Sydney Water sewer system under the Industrial Trade Waste licence. Residual sludge for the process will be directed to an EPA-approved treatment facility.
- Liquid food waste (packaged or bulk) will be stored in appropriate storage tanks and transported offsite to an approved facility or reuse site application. All liquid food waste will be managed via the NSW EPA Liquid Food Waste exemption.
- Waste containing predominantly water (fire debris/ stormwater etc) will be screened to remove solids contamination and directed to the biological treatment process.
- The entire treatment area will be subject to air quality management. Potentially contaminated air, including all tanks and processing units, will be treated through the granular activated carbon units prior to discharge in accordance with the EPA Licence. 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.

New treatment and storage units proposed include (conceptually):

- Five (5) 50,000 litre storage tanks
- Two (2) 50,000 litre process tanks

- Two (2) biological treatment tanks (size yet to be determined)
- One (1) screened receival system
- One (1) shredder
- Positive displacement transfer pumps
- An additional Carbon Odour Control unit

The proposed conceptual layout (subject to design development) is shown on **Figure 3.5.** Operational management measures are discussed further in **Section 7**.

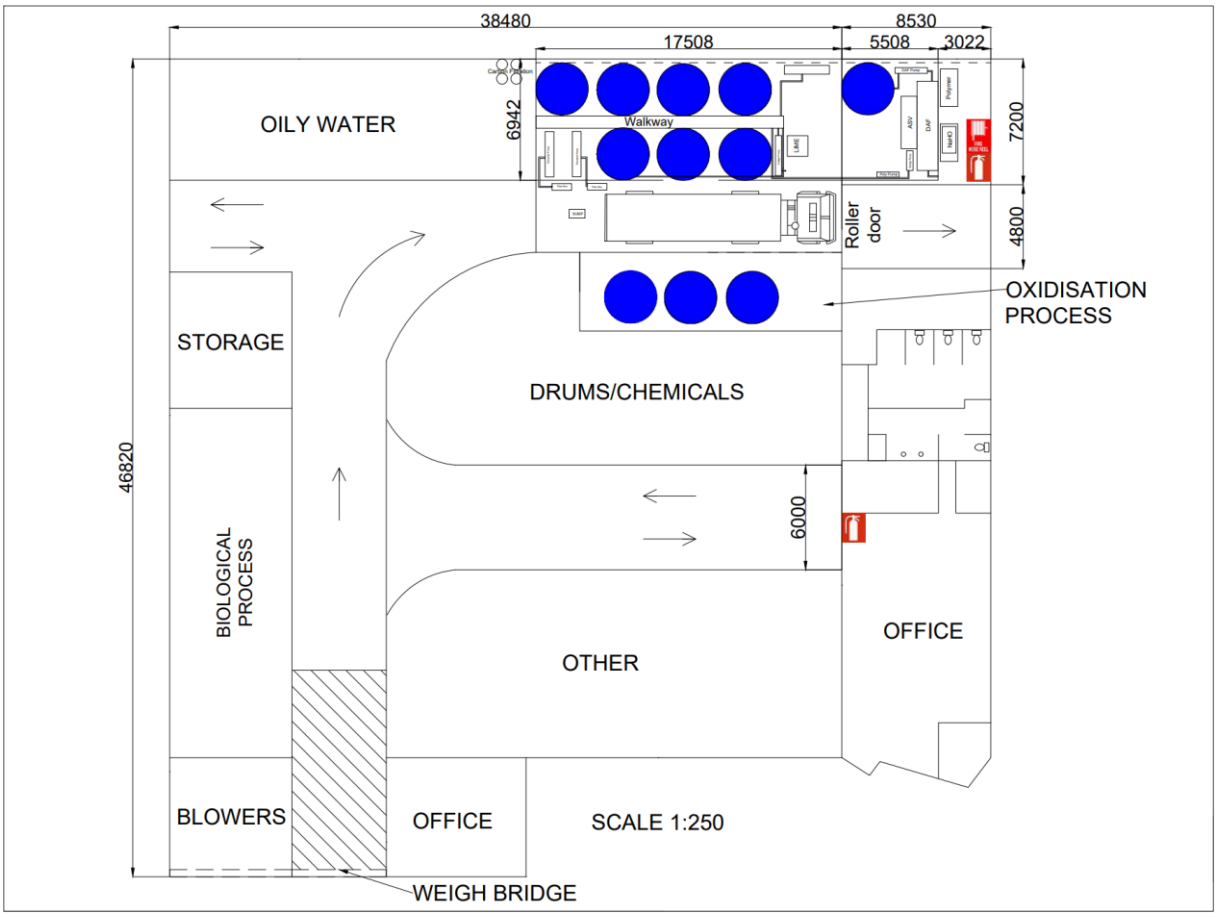

Figure 3.5 Proposed Site Layout

Figure 3.6 Granular Activated Carbon (GAC) Canisters for Air Filtration. Modular system allows all offensive gases to be scrubbed, and additional canisters on standby.

3.3.2 Transport and Hours of Operation

Operations would be carried out up to 24 hours per day depending on the wastes received, primarily Monday to Friday, fifty-two weeks per year. Work may be required to be carried out on Saturdays and Sundays dependant on the site treatment requirements or if 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.

Industrial liquid wastes are primarily transported in larger (8-wheel heavy rigid vehicles) and later in the day than the existing grease trap wastes. This will avoid disruption at site, and minimise impacts on the local road network. Swept path analysis has previously been carried out in 2019, and confirmed that 8-wheel heavy rigid vehicles can satisfactorily park, unload and exit the facility. An updated traffic, access and parking assessment will be carried out, and unloading and parking plan prepared.

3.3.3 Costs and Staging

The projected capital cost for the proposed changes is approximately $900,000, and would generally comprise additional units and facilities as follows:

- Detailed design and procurement of key items of plant/equipment following planning consent;
- 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 six months, with commissioning and operations only following EPA Licence amendment.

3.4 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 biological treatment and then discharged to sewer. 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 and certified for the proposed changes.

4 STATUTORY CONTEXT

4.1 PLANNING APPROVALS FRAMEWORK

4.1.1 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 4.2.1.1** for a description of the permissibility of the proposed development under the Fairfield Local Environmental Plan 2013).

Schedule 3 of the *Environmental Planning and Assessment Regulation 2021* sets out the criteria for Designated Development. Part 2, Section 45 applies to Waste Management Facilities or Works, and states that "development for the purposes of a waste management facility or works that purify, recover, reprocess or process more than 5,000 tones per year of solid or liquid organic materials is designated development.

4.1.2 SEPP (Planning Systems) 2011

This SEPP (Schedule 1 Section 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 DPE 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 of Schedule 8 of the *EP&A Regulation (2021)*.

4.1.3 Integrated Development

The proposed cumulative development would be defined as a scheduled activity pursuant to Schedule 1 (Cl. 41 Waste processing (non-thermal treatment)) of the *NSW Protection of the Environment Operations (POEO) Act (1997)*, as it may involve having on site at any time more than 200 kilograms of liquid waste, and may involve having on site at any time more than 2,000 litres of waste oil, and may involve processing more than 20 tonnes of waste oil per year. Hence the proposal will require concurrence approval from NSW EPA, an amended environment protection licence will be required, and will be considered integrated development in accordance with section 91A of the *EP&A Act.*

4.2 ENVIRONMENTAL PLANNING INSTRUMENTS AND STRATEGY DOCUMENTS

Development is subject to local, regional and state planning instruments, as outlined below.

4.2.1 Local Planning Instruments

4.2.1.1 Fairfield Local Environment Plan (2013)

The subject land, Lot 603 DP 260618, is zoned General Industrial Zone E4 in accordance with Fairfield LEP 2013. The objectives of the zone and how the cumulative development meets those objectives are set out in **Table 4.1** below.

Table 4.1: Consistency with Objectives of LEP 2013, General Industrial Zone E4

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 E4 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. According to Council's flood modelling, the Site as having a medium risk of overland flood inundation: an updated Flood Risk Mitigation Plan will be developed.

4.2.1.2 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 4.2 below;

- Flood Risk Management (Chapter 11) – see Table 4.2;
- Car Parking, vehicle and access management (Chapter 12) – see Table 4.2.

Table 4.2: Fairfield City Wide DCP 2013 relevant provisions

Provision	Consideration	Outcome
9.2 Car parking, vehicle and access management	Referral to Transport for NSW (TfNSW) for traffic generating development and controls relating to the requirements for car parking and vehicular site access.	Referral to the TfNSW and Council.
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).	Prepare and update Management Plan.
12.1.1 Parking Rates	Resource Recovery Facility – Merit-based assessment	Traffic/access/parking Study.
12.2 Design Guidelines	Provides detailed design guidelines for car parking.	The Proposal includes car parking which will comply with the DCP provisions.

4.2.2 State and Regional Plans

4.2.2.1 State Environmental Planning Policies

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

- SEPP (Transport and Infrastructure) 2021
- SEPP (Resilience and Hazards) 2021
- SEPP (Biodiversity and Conservation) 2021
- SEPP (Primary Production) 2021
- NSW Waste and Sustainable Material Strategy 2041
- Planning for Bushfire Protection 2019

SEPP (Transport and Infrastructure) 2021

Under this SEPP, Zone E4 General Industrial is a prescribed zone in accordance with Clause 2.153. This 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.*

The Land Use Table of the Transfer and Infrastructure SEPP also states that "*waste or resource management facilities"* in a prescribed zone are permitted with consent.

In addition, Schedule 3 of the Transfer and Infrastructure SEPP identifies resource recovery or waste transfer stations of any size or capacity as being traffic generating activity. 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 Transport for NSW.

SEPP (Resilience and Hazards) 2021

This SEPP 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 updated air quality / odour assessment study (see **Section 6.4**) 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 for industry. 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.

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.

NSW Waste and Sustainable Material Strategy 2041: provides targets for the reduction in waste. 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 proposed Facility will assist in meeting this target and is considered to be consistent with the NSW Waste and Sustainable Material Strategy 2041.

4.3 ENVIRONMENTAL LEGISLATION

4.3.1 NSW State Legislation

4.3.1.1 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. The existing EPL No. 21629 would need to be amended to include provisions for the proposed new waste streams.

4.3.2 Commonwealth Legislation

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

4.3.3 Other Agency Requirements

Relevant agencies and key stakeholders will be consulted for this proposal, including Fairfield City Council (FCC), TfNSW, DPE, NSW Fire & Rescue and EPA. Initial consultation has been carried out with Sydney Water (sewer capacity and Trade Waste Agreement requirements), and DPE regarding the approval pathway. A Pre-DA meeting is scheduled with Council on 31 August 2023.

4.4 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.

5 COMMUNITY ENGAGEMENT

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.

5.1 CONSULTATION PROGRAM

A list of the organisations to be contacted and issues raised is provided in **Table 5.1**.

Table 5.1: Stakeholder Consultation

Organisation Consulted	Date	Comments
Fairfield City Council (pre-DA meeting)	10.00am, Thursday 31 August 2023.	• 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 • Fire/SEPP33 • Meeting notes to be issued by Council • Halgan seeks Council update on any other developments, standards or infrastructure projects that may impact proposal.
DPE	TBD	• Provide overview & seek feedback • further detail on waste types and operational contingencies • Clarify Waiver Application requirements for Aboriginal Cultural Heritage and Biodiversity Assessment
NSW EPA	TBD	• Provide overview to Manager, Hazardous Materials, and Operations Licencing (Metro West) • Sent Scoping Report & meeting request
NSW Fire & Rescue (9742 7434)	TBD	• Halgan to seek requirements, explain existing and proposed operations.
Transport for NSW (TfNSW)	TBD	• Halgan to seek requirements, explain existing and proposed operations.
Sydney Water	TBD	• Sufficient local sewer capacity exists • Trade Waste Agreement will be required, with stringent discharge limits and monitoring.

5.2 CONSULTATION WITH LANDOWNERS AND SURROUNDING BUSINESES

Halgan acknowledges the need to be a good neighbour and to minimise the footprint of its operations while operating a viable recycling operation. Since leasing the Facility at 10 Davis Road Wetherill Park in 2019, Halgan has established and maintained contact with all adjacent land users regarding site management, emergency response etc. There have been no adverse contacts or complaints from neighbours to Halgan's operations.

Adjacent businesses will be specifically consulted during the EIS preparation phase to explain the proposal, and responses included in the EIS. Further consultation with landowners and businesses will be carried out during exhibition of the EIS.

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 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 E4 in accordance with *Fairfield Local Environment Plan (LEP) 2013*. As set out in Section 4.2, 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. All works are to be carried out within the existing building.

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.

It is not anticipated that the amenity of neighbouring properties will 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. Since commencement of operations in 2021, full compliance with EPA Licence conditions has been achieved, with no adverse impacts or complaints. 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 are fitted with strainers to remove larger waste that may have been dropped on site.

Areas receiving and storing waste are fully bunded. Treated liquid water is discharged to sewer 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, hence no salinity, contamination or latent heritage issues are anticipated.

6.2.2 Construction impacts

The installation of the 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. The Flood Risk Management Plan will be updated as required, however no changes to levels are required, hence no additional risks are anticipated.

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 indicate no listed threatened species in the immediate vicinity.

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 was secured for the local EIS in 2020.

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 tanks etc. within the building. 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 receival, storage and treatment and load out of liquid waste.

6.4.4 Mitigation measures

- Installation and operation of ducting and upgraded scrubber system;
- Segregated area to be managed such that 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

An updated 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. Since commencement of operations in 2021, no noise complaints have been received by Halgan, Council or EPA.

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 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.

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.

An updated traffic, access and parking study will be prepared. Since commencement of operations in 2021, no traffic or safety near-misses or incidents have been recorded by Halgan, Council or EPA.

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 indicated that there were no registered sites or relics on, or in the immediate vicinity of, the property.

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 the site and 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 6.1** outlines the measures designed to mitigate health risks associated with the proposed amplification:

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	▪ Wastes transported in enclosed tanker trucks ▪ Compliance with EPA and WasteSafe tracking system as required.

Aspect of Operation	Nature of Risk	Potential Exposure Pathway	Proposed Safeguards
			▪ Training in appropriate procedures 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	▪ Products transferred as soon as possible (generally 12-hour turn over max 24-hour residence time) ▪ Unloading via gravity and positive displacement pumps. Receival 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	▪ All wastewater to be discharged to Sydney Water sewer via hard plumbed pipework
Stormwater management	Contamination	Physical contact	▪ 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	▪ 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	▪ 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	▪ Restricted public access ▪ Site bounded by appropriate security fences, with 24hr CCTV and alarm system. ▪ 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.

Trucks use diesel fuel, with diesel and gas-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 an additional 70,000 tpa of liquid waste, with treated residue transported off-site for beneficial reuse/disposal, 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 2,** 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 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 will be carried out for this proposal using *Hazardous and Offensive Development Application Guidelines.* This will assess primarily liquid waste receival, 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.

An amendment to the existing EPL will be sought from NSW EPA to accept the additional liquid waste streams 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 anticipated to be negligible with the proposed controls, facility design, operational scheduling, and updating/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 updated. 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. Since commencement of operations in 2021, no safety non-conformances or incidents have been registered by Halgan, Council, or NSW EPA or WorkSafe.

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 are to be confined to a small area within the existing building, and relatively straight-forward. A construction environmental management plan (CEMP) will be prepared, including housekeeping, protection of trees/stormwater system, and incident management plans.

Although no excavation is required or proposed, and unexpected finds protocol will be included in the CEMP, and tool-boxed with all staff/contractors. All waste removed will be segregated and recycled if possible, and soils classified in accordance with the EPA Waste Classification Guidelines for appropriate disposal.

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 following any incident, 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

End Note: This Scoping Report has been prepared in general accordance with the requirements of State Significant Development Guidelines - Preparing a Scoping Report (NSW Department of Planning Industry and Environment, Oct 2022). As the existing development has been subject to assessment and approval in 2020 (refer to NSW Planning Portal for EIS, all associated studies and agency reviews CNR-11167), a full tabulation of assessment factors has not been included.