



Mr Timothy Baillie
Director
Bulk Recovery Solutions Pty Ltd
16 Kerr Road
Ingleburn New South Wales 2565
11/12/2020

Dear Mr Baillie

**Ingleburn Resource Recovery Facility (SSD-8593)
Request for Additional Information**

I refer to the revised Response to Submissions (RTS), dated October 2020, for the Ingleburn Resource Recovery Facility (SSD-8593).

The Department has reviewed the RTS report in consultation with the Environmental Protection Authority and Council. Unfortunately, the Department can not progress the application until further information is provided.

The Department requests that a response is provided to the issues outlined in **Attachments 1 and 2**. The EPA's comments will be provided as soon as they are received.

You are requested to provide the information, or notification that the information will not be provided, to the Department by 01 February 2021. If you are unable to provide the requested information within this timeframe, you are requested to provide, and commit to, a timeframe detailing the provision of this information.

If you have any questions, please contact Emma Barnet, who can be contacted on 92746412/ at emma.barnet@planning.nsw.gov.au.

Yours sincerely,

A handwritten signature in blue ink that reads 'W Hodgkinson'.

William Hodgkinson
Team Leader
Industry Assessments

Attachment 2: Council's letter dated 30 November 2020

Attachment 1
SSD 8593- Ingleburn Resource Recovery Facility
Review of Revised Response to Submissions dated October 2020

General

- Given the extent of changes, a request to amend the DA in accordance with Clause 55 of the Environmental Planning and Assessment Regulation 2000 is required.
- The summary of the proposed amendments to the original development is not comprehensive, numerous components have been left out. Please provide a detailed list which includes all changes proposed subsequent to the exhibition of the EIS (including the flaps on the noise wall, awning, removal of grease trap waste and hazardous waste and change of methodology for asbestos treatment). Please note that a processing capacity of 500,000 tonnes per annum was not part of the exhibited proposal.
- Table 1-1 of the RTS provides a list of wastes currently allowed to be processed under existing consent/licences and a list of additional waste proposed to be treated. It has never been clear whether you propose to continue treating all the wastes in column 1 noting that the Department prefers that the existing consents be surrendered, please address.

Site Plans

- It is noted that the site plans have been updated as requested, however, they still do not show all of the waste to be stored onsite. Please amend the plans and descriptions to include municipal waste and its components including timber, commercial waste and its components, slag, leachate, groundwater, fly ash, grit and crushed glass. Please also accurately label the external stockpiles.
- It is noted that the site plans of the office and laboratory have not been provided and that Council advises that these components have not been approved. Please clarify whether a consent has been issued for the three-story office and lab and, if not, what you are seeking consent for.
- Appendix D of the October RTS contains tipping procedures for a range of wastes, as requested, please also provide waste process flow diagrams that match the relevant process descriptions.
- Please provide plans for the approved awning which shows the location of the footings and supports.

Capacity

- Appendix H provides a breakdown of the storage capacity of the facility. It is noted SB15 is listed as both the pre-crushing storage area and the Tip & Spread area, please note that these two areas should be separate, is there alternate pre-crushed waste stockpile?

Asbestos

- The asbestos waste drop off procedure still indicates that the vehicle would be hosed out and the asbestos liquid waste would be sampled, please update this procedure in accordance with the description in the RTS.
- Please confirm the type of asbestos containing waste to be received on-site. Is it Liquid Containing Asbestos or Asbestos Containing Liquid?
- Please describe the processing and treatment methods for the confirmed asbestos waste.

Stormwater

- It is noted trucks would be cleaned out at the individual unloading areas, please explain how the washout water is captured for each waste unloading area.
- The stormwater assessment in Appendix J describes the proposed stormwater management on site, including water to be released offsite in major storm events. Please clarify what is meant by a major storm event and please also characterise the water at the point of discharge.
- It is unclear whether flocculation tanks are to be used for water storage in large rain events as per the existing development if so, where would the liquid waste be treated while the water is being stored?
- The stormwater assessment states that the proposed development does not impact the overland flow paths, however, this is untrue as the impact of the stockpiles in the easement has not been assessed. It is also noted that previous versions of the RTS, and pages 32, 37 and 53 of the October RTS, state that the stockpiles in the easement had been removed from the development. However, it would appear stockpiles are again part of the development. Please clarify whether stockpiles in the easement to drain water are proposed and if so, undertake an assessment of the off-site flood impact.

Waste Management

- Please provide a breakdown of municipal waste and commercial waste to be stored onsite, please also indicate where it would be separated, and the components stored.
- Figure 15-1 provides the locations, names, dimensions and capacities of waste storage facilities. However, it is noted that there is no barrier between SB 8 and SB 7 or SB 9, please demonstrate how these stockpiles would be kept separate and also how a truck would access SB 9 when SB7 is full.
- Table 15-3 in the RTS shows the approximate quantities for existing and proposed waste streams, however, it does not include restricted solid waste as a solid waste stream, please clarify.
- Please demonstrate the tip and spread area is separate to the unprocessed C&D waste stockpile.
- Figure 15-1 provides the locations, names, dimensions and capacities of waste storage facilities. Please describe what would be stored in SB 4 - 6 and SB 19.
- Appendix H still refers to asbestos containing liquid, please amend to include the correct waste type.

Traffic

- Please provide a series of swept path analyses that:
 - demonstrates a vehicle can access the internal tip and spread area
 - demonstrates a heavy vehicle can navigate the awning support structures
 - shows two liquid waste vehicles operating internally.
- Drawing No. TURN02 in Appendix E indicates heavy vehicles would scrape against the existing noise barrier, please clarify.
- The May 2020 traffic assessment states that Lancaster Street would be used in lieu of on-site stacking yet the recent version of the RTS states that there would be no stacking or queuing. Please clarify how the facility would avoid stacking while accepting greater traffic volumes than the current development.

- As the development needs to account for worst case scenario, please provide a plan showing stacking/queueing spots to be used if required noting that stacked vehicles are usually stationary.
- The Department still has concerns that traffic has been underestimated, p 30 of the RTS states there will be 34 Heavy vehicles (HV) trips per hour (hr) which equates to 17 HV/hr, yet p 4 of the traffic assessment in Appendix F states there will be 4 vehicles per hour and the most recent time step analysis shows 7 vehicles in a standard hour. This current report appears to be an underestimation. Please clarify noting that the original traffic assessment was also based on the assumption 225,000 tonnes of waste would be accepted per annum.
- Please use data from the weighbridge for the solid waste traffic estimation (you don't need make and model or capacity of trucks for the assessment) or demonstrate the solid waste trucks would always be at capacity.
- Please provide a vehicle breakdown by hour to demonstrate that operational peaks have been assessed.
- Describe what safety measures the development would have in place to prevent liquid waste trucks backing into tanks.

Attachment 2
SSD 8593- Ingleburn Resource Recovery Facility
Council's Review of Revised Response to Submissions dated October 2020