



Mr Timothy Baillie
Director
Bulk Recovery Solutions Pty Ltd
16 Kerr Road
Ingleburn NSW 2565
19/02/2021

Dear Mr Baillie

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

I refer to our meeting of 17 February 2021 regarding the Ingleburn Resource Recovery Facility (SSD-8593). We note you have requested to amend the proposed development to remove certain activities and are now seeking approval for receipt and processing of liquid waste (excluding asbestos contaminated liquids) only. As a result of these proposed changes and our consideration of documentation previously submitted, the Department is requesting that you provide additional information.

You are requested to submit additional information that confirms the scope of the revised proposal and effectively addresses the issues identified in Attachment 1. **We recommend that your specialist consultants contact the Department directly to discuss in detail the requirements for each issue.**

You are requested to provide the information, or notification that the information will not be provided, to the Department by 5 March 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 Sheelagh Laguna, who can be contacted on 92746574/ at sheelagh.laguna@planning.nsw.gov.au.

Yours sincerely,

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

William Hodgkinson
Team Leader
Industry Assessments

Attachment 1

A. The Amended Proposal

From our meeting of 17 February and your letter dated 18 February 2021, the Department understands the proposed development will be amended to remove certain elements, with the following elements to remain:

- Liquid Waste receipt and processing (excluding Asbestos Containing Liquid) – 116,250 tonnes per annum (tpa) – with a breakdown of liquid waste being oily water, industrial wastewater, drill mud, stormwater, groundwater, leachate, sewer waste and firewater as described in Table 1-1 of the RTS dated October 2020 and updated by the addendum RTS dated 7 January 2021.

Based on the proposed amendments and our discussion, the Department understands the following will be applicable to the amended proposal:

- Vacuum trucks (12 t trucks) delivering liquid waste would need to access the site on a 24/7 basis. Delivery of liquid waste at night would occur on an irregular and unpredictable schedule, depending on client needs (e.g. Sydney Water sewer clog pump out emergency).
- Liquid waste processing (in tanks) would occur 24/7.
- Removal of residuals from liquid waste processing (using 28 t trucks) would occur during daytime hours only.
- All trucks accessing the site are required to pre-book a time slot, including those occurring at night.
- Trucks accessing the site would be spread out evenly across the day-time operating hours.
- Only one liquid waste truck would operate in the main building at any one time.
- All liquid waste processing would occur internally or under the existing north-eastern and south-eastern awnings.
- No asbestos would be accepted and processed on site.
- All tanks and stored chemicals would be appropriately bunded.
- Liquid waste processing would be vacuum pressurised to prevent the release of odour.
- Charcoal filters would be installed on the DAF.
- No mobile plant would operate externally at night and only one internally.

Please confirm the understanding above or advise of changes and provide an accurate, complete and updated description of the proposed development in your response.

B. Further information required to finalise the Department's assessment

As discussed, the Department requires the following additional information to finalise its assessment of the proposal, as amended.

General

Please provide the following updated information:

1. Updated site plans (BRS-Site-002 and SITE02 revision P) that accurately show all elements of the amended development.
2. An equipment and plant list and labelled diagrams of all plant that would be used to process liquid waste.

3. An updated process description for liquid waste that matches the proposed equipment list. The existing equipment list and process description do not match the process flow diagrams (see p 32 of the EIS).
4. Clarification of equipment and plant that would be used during the night-time period and a description of its night-time use.
5. An updated site matrix showing where leachate and groundwater would be tipped and processed.
6. Clarification of the onsite storage capacity sought in the amended application i.e. storage at any one time for liquid waste, filter cake etc.
7. Clarification of the hours during which the various liquid waste activities would occur within a 24-hour period, being:
 - a. The 'regular' daytime hours of liquid waste delivery and removal, including the days this will occur (*for example 7am-6pm Monday to Saturday*).
 - b. The 'irregular' night-time hours of liquid waste delivery only and the days this will occur (*for example 10pm-6am Monday to Friday*)
 - c. The hours when mobile plant (e.g. forklifts) will be operating
 - d. The hours of any other activities
8. Specification of the location of the lab on a plan and identification of whether this space has been previously approved for use as an office.
9. An architectural drawing of the noise wall or demonstrate that the wall is no longer required for the amended proposal.
10. A description of the how the booking system used for waste deliveries would operate to manage onsite traffic.
11. A list of management and mitigation measures which includes all measures proposed to be implemented on site to manage potential impacts of the development (liquid waste acceptance and processing). This list would be included in any consent issued for the development.

Air

The air quality impact assessment (AQIA) should be reviewed in light of the amendments to the proposal. In particular, the following information is required:

12. The AQIA states that liquid waste processing includes biological treatment, sludge thickening, and encapsulating sludge material in concrete, however, these processes are not described in any other documents. If these processes are still proposed, please include in the amended process description, if not, demonstrate that the removal of these processes would not impact odour emissions beyond what was originally assessed.
13. Appendix B of the October Response to Submissions (RtS) states that the vacuum storage tanks will be fitted with carbon filters to treat the air ventilated during the filling of the tanks, and any such release occurs indoors. It is our understanding that the sewage sludge and J120 liquid waste would be pumped into a treatment process outside the building. Please confirm if this is the case. If so, please demonstrate that tipping of odorous waste external to the building would not adversely impact odour emissions.

Noise

An updated noise assessment is required that includes assessment of the impacts of night-time liquid waste delivery.

14. The Noise Impact Assessment (NIA) assessed operational noise based on 'urban' amenity noise area category, however, it should have been based on a 'suburban' amenity noise

area. As such, LAeq,15min project noise trigger levels (PNTL) should be lower for the night-time period. Please update the noise assessment to reflect the correct noise area category.

15. Ensure the sound power levels used in the updated assessment correspond to the actual equipment to be used onsite.

Traffic

An updated traffic impact assessment (TIA) should be provided based on the worst-case scenario and should:

16. Detail the maximum number of pre-booked trucks arriving and leaving the site per hour and identify in which hour(s) this would likely occur based on operational requirements (known as the 'operational peak'). Traffic numbers must reflect the proposed capacity increase for liquid waste which is at least 4 times greater than the existing approved capacity.
17. Include a justified and accurate estimate of the frequency and maximum vehicle numbers (both per day and per year) connected to the 'irregular' delivery of liquid waste (i.e. those deliveries occurring during the hours specified in point 7.b above).
18. Provide the results of updated traffic modelling based on the maximum hourly traffic numbers for liquid waste identified in points 16 and 17 above.
19. Include a cumulative traffic assessment for liquid waste and other waste remaining under the existing Council consent, taking into account the maximum quantities to be received and dispatched.
20. Include an updated time-step analysis for trucks onsite at any one time.
21. Justify the assumption that all delivery trucks would arrive and leave the site at full capacity.