



Planning &
Environment

Planning Services

Industry Assessments

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Our Ref: SSD 7256 MOD 3

Mr Ben Sawley
Cleanaway ResourceCo
35-37 Frank Street
Wetherill Park NSW 2164

Email: ben@resourceco.com.au

Dear Mr Sawley

**Response to Submissions
ResourceCo Resource Recovery Facility Modification (SSD 7256 MOD 3)**

The notification of the above modification application ended on 25 April 2019. All submissions received by the Department during the notification of the modification application are enclosed (**Attachment 1**).

The Department requires that you provide a written response to each of the issues raised in a Response to Submissions (RTS) report. In addition, it is requested you address the issues raised by the Department in **Attachment 2**. Your RTS should include any revised management and mitigation measures, if considered necessary.

If you have any questions, please contact Bianca Thornton on the details listed above.

Yours sincerely

Kelly McNicol
**Team Leader, Industry Assessments
Planning Services**

Enclosed/Attached:

Attachment 1: Submissions

Attachment 2: Department's Comments

Attachment 1: Submissions

Memorandum

TO: BIANCA THORNTON – INDUSTRY ASSESSMENT OFFICER,
DEPARTMENT OF PLANNING AND ENVIRONMENT

FROM: KERREN VEN – STRATEGIC PLANNER, FAIRFIELD CITY
COUNCIL

CC:

SUBJECT: MODIFICATION APPLICATION FOR RESOURCE RECOVERY
FACILITY AT 35-37 FRANK STREET, WETHERILL PARK

FILE: SSD 7256 MOD 3

DATE: 30 APRIL 2019

The modification seeks to replace the approved designated storage area wrapped and baled process engineered fuel (PEF) to the existing an outdoor storage area from 287m² to 1,291m².

1. The following comments were provided from Council's Environmental Management Section (EMS):

The proposal involves 4 fold increases in the designated area for external storage of processed, wrapped and baled Processed Engineered Fuel (PEF). It states that as all materials are sealed, any potential leachate or litter issues can be managed by existing stormwater quality control devices. It is noted that these devices are gross pollutant trapping devices and do not treat leachate. Discussions with the EPA reveal ongoing issues with containment of existing outdoor storage, including loss of containment of baled waste.

No details of any fire fighting water retention system for outdoor areas have been presented or, if one exists, the implications the 4 fold increase in materials stored onsite. A fire engineering report dated 2017 refers to containment of fire fighting water 'within the footprint of the building'. This is not relevant to outdoor storage.

Based on the submitted information, EMS believes that the following information should be sought prior to further comment:

- Either
 - Details of the containment and disposal of leachate from the outdoor storage of Processed Engineered Fuel (PEF); or
 - Details of internal storage of Processed Engineered Fuel (PEF);
- Details of the onsite containment of fire fighting water.

2. The following comments were provided from Council's Traffic Engineers:

A review of the plans reveal that the storage area at the site shall be differentiated from the manoeuvring/circulation areas by signposting and line markings.

Swept path diagrams provided by the applicant show the manoeuvring of 19m long articulated vehicles and 26m long B-Double vehicles within the site. However, the movements of the articulated and B-Double vehicles manoeuvring into and out of the driveway onto 35-37 Frank Street, Wetherill Park are not shown on the swept path diagrams.

Swept path assessment undertaken by Council officers in accordance with Austroads Design Vehicles and Turning Path Templates shows it would be difficult for the 19m long articulated vehicles and 26m B-Double vehicles to manoeuvre

into the site due to the proposed access arrangement. The swept path diagrams provided by the applicant need to show 19m long and 26m long vehicles can satisfactorily manoeuvre into and out of the driveway and which direction these vehicles are travelling to/from Frank Street.

In addition, further information shall be provided to Council regarding the number of 19m long articulated vehicles and 25m/26m long B-Double vehicles that are anticipated to attend the site on an hourly/daily basis. This is to ensure there will be no potential conflicts among users on-site. Where there are a high number of trucks servicing the site on hour/daily basis, a loading management plan shall be submitted to Council for assessment.

The applicant shall also clarify whether the access driveway located on the south-eastern corner of the site will be used by vehicles and/or trucks.

If you have any questions regarding what is requested by Council, please do not hesitate to contact me on 9725 0222.

Kind regards,

Kerren Ven

STRATEGIC PLANNER, STRATEGIC LAND USE PLANNING



DOC19/ 349527

Ms Bianca Thornton
Planning Officer
Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

EMAIL

24 April 2019

Attention: Ms Bianca Thornton

**SSD 7256 – Cleanaway ResourceCo Wetherill Park – Modification Application (Mod 3) –
Amendment of Approved Site Layout Plan to Increase the Designated Area for Bale Storage**

I refer to the modification application (**the Application**) submitted by ResourceCo RRF Pty Ltd (**ResourceCo**) to increase the storage capacity of baled waste outside from 287 square metres to 1,291 square meters at 35-37 Frank Street, Wetherill Park, Lot 31 DP 589097 (**the Premises**).

The Environment Protection Authority (**EPA**) has reviewed the modification application and associated documents and advises that no information has been provided to support the Applicant's assertion that no harm will be caused from the increased volume of waste being stored outside, particularly in relation to potential water pollution from the Premises. No testing/modelling has been provided to predict pollutant loads into the environment, or to demonstrate that no pollution is being generated from outside storage of waste at the Premises.

Therefore the EPA is unable to support the modification application in its current form.

The EPA notes that during several inspections of the Premises, EPA officers have observed bales of waste stored outside that have been inadequately wrapped or ripped, with PEF exposed and escaping the bales. This greatly increases the likelihood of waste contaminating surface water and discharging to stormwater. The EPA also notes that, during one inspection, the baling machine did not appear to be working correctly and waste was not completely sealed.

The EPA understands that currently all water that comes into contact with this outside area flows through a HumeGard HG18 GPT, a Humes JellyFish JF3000-19-4 Filter and through an Ecosol RSF100 litter basket. These controls are designed to deal predominantly with sediment/particulate pollutants. Various waste types and waste streams are permitted to be accepted by ResourceCo. Many pollutants such as nutrients and metals would be expected to be generated from these waste types. The EPA would consider it unlikely that the current water treatment system would be able to remove all potential pollutants from the waste water prior to discharge.

Further information must be provided by ResourceCo as follows:

- a) a detailed process that will adequately characterise the quality of wastewater discharged to inform any needed mitigation measures such as additional treatment systems for potential dissolved contaminants; or

- b) proposals for controls that would be implemented to prevent potential dissolved contaminants entering offsite waterways, e.g. additional permanent covers, storing undercover, bunding.

If ResourceCo choose to use the discharge characterisation route, then the elements should include:

1. A Surface Water Discharge Characterisation Assessment involving representative water sampling to account for the full range of potential pollutants. This should include representative event-based samples of discharge quality immediately below the final treatment system of first-flush stormwater runoff (i.e. not in downstream waterways which may be affected by other pollutants sources).
2. A Surface Water Mitigation and Monitoring Plan that includes an investigation of practical measures that could be taken to avoid or minimise pollution based on the Surface Water Discharge Characterisation Assessment and also the development of an ongoing monitoring plan for any identified risk factors.
3. A Surface Water Validation Report to demonstrate the effectiveness of surface water control treatment structures and effectiveness of any implemented mitigation options.

ResourceCo have noted in the Application that some sampling has already commenced relating to sampling required by the Surface water Management Plan. This information should be submitted as a part of the Application.

If you have any questions regarding this matter, please contact George Jamieson on 9995 5204.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Spitts' with a large, stylized initial 'S'.

DEANNE PITTS
A/Unit Head Waste Compliance
Environment Protection Authority

Attachment 2: Department's Comments

General

1. Provide land owner's consent.
2. Provide a Donations and Gift Disclosure. The form can be downloaded from the Department's website: <https://www.planning.nsw.gov.au/Assess-and-Regulate/Development-Assessment/Planning-Approval-Pathways/Donations-and-Gift-Disclosure>

Leachate

3. Section 2.1.3 of the Modification Application states that baled PEF is wrapped in a water proof plastic which would eliminate the generation of leachate. Discussions with the EPA have indicated that during recent site inspections, some of the wrapping was found torn or unsealed. Further, the EPA's letter advises that the existing stormwater controls are not designed to remove the pollutants found in leachate. Additional information on leachate management is requested.

Fire and Incident Management

4. The proposed modification involves increasing the external storage of PEF by 4.5 times the approved volume. As such, information on fire and incident management is required.

Site Manoeuvrability

5. Details on how the safe and efficient movement of pedestrians and vehicles will be achieved throughout the operation of the development is requested. While updated swept path diagrams have been provided, there are two areas of concern regarding truck manoeuvrability:
 - the area between Bale Storage B and the weighbridge
 - the area between Bale Storage C and Bale Storage D.The two areas of concern are shown in Figure 1.

Figure 1

