

21 April 2021

Recycling & Recovery

NSW Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124  
Dear Sir/Madam

## **Lucas Heights Resource Recovery Centre - GO Facility and ARRT Facility Request for approval of staged construction**

### **Introduction**

The relocation and expansion of the existing garden organics (GO) facility and Advanced Resource Recovery Technology (ARRT) facility at Lucas Heights Resource Recovery Centre was approved on 23 January 2017 as a component of the approved SSD 6835.

The current approval under SSD 6835 allows for the construction of both a Garden Organics (GO) facility and Advanced Resource Recovery Technology (ARRT) facility. Construction of these facilities would be implemented in stages and water management works would likewise be staged to minimise the impact of the activities, by ensuring that disturbances only occur when required.

### **Purpose**

This letter has been prepared to address consent condition B14 (SSD 6835) that states:

*With the approval of the Secretary, the Applicant may:*

- (a) Submit any strategy, plan or program for the landfill re-profiling, GO Facility and ARRT Facility construction and operation, required by this consent, on a progressive basis; and/or*
- (b) Combine any strategy, plan or program required by this consent.*

SUEZ is proposing a staged approach to the construction of the GO Facility and ARRT Facility. The program for the proposed construction timeline is summarised below.

### **Program**

Table 1 outlines the proposed staged plan for the construction of the GO facility and ARRT Facility. The Mill Creek realignment would be constructed on a progressive basis to accommodate the staged approach.

In October 2018, the EPA stopped the application of mixed waste organic material on agricultural land and mine site rehabilitation until further controls could be considered. The planned ARRT facility would process up to 200,000 tonnes per year of mixed waste with the intention of producing mixed waste derived compost for application to land. The recent regulatory changes and future uncertainty mean that there is unlikely to be a use for the compost that would have been produced by the ARRT facility in the short term. Operation of the ARRT Facility is therefore proposed to be delayed, (potentially by up to more than 10 years).



**Table 1 Proposed program.**

Stage	Proposed timeline
Construction of GO Facility	2021 (pending approval by DPIE)
Construction of ARRT Facility	> 2031 (pending regulatory guidance for mixed waste compost)

The construction activities associated with the GO Facility include:

- GO Facility West: earthworks, construction of hardstand, internal access road, water and leachate infrastructure, waste receival and sorting areas and compost bunkers and storage areas, Mill Creek realignment and rehabilitation (to the extent required for the construction of the GO facility alone, without the ARRT facility).
- GO Facility East: relocation works within Area 2 and 3 of the GO areas.

#### Management plans

GHD has prepared a Construction Environmental Management Plan (CEMP) for the redevelopment of the GO facility to comply with Conditions D1 and D2 of the Consent.

According to the Consent conditions the CEMP will include the following:

- CEMP for the dual gas and leachate trench (prepared by SUEZ and approved by the EPA)
- Erosion and sediment control plan
- Vegetation and fauna management plan
- Construction traffic management plan

In addition, the following plans have been prepared to support the project:

- Mill Creek Stream rehabilitation, stabilisation and vegetation management plan
- Aquatic habitat monitoring plan.

Only the GO facility would be constructed at this stage. As such, the construction environmental management plans deal with the provision of the GO facility alone, and associated management measures. Where an opportunity exists to delay the full extent of approved disturbance activities (such as undertaking on a smaller initial creek realignment) this will also be proposed.

Sincerely,

Compliance Manager NSW

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