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Mr Chris Ritchie
Director, Industry Assessment
NSW Department of Planning & Environment
Locked Bag 5022
Parramatta NSW 2124

CC: Rebecka Groth
Senior Environmental Officer

Dear Chris,

RESPONSE TO AGENCY COMMENTS | SSD-21190804 - JALCO MANUFACTURING FACILITY

This letter is written in response to the correspondence received from the NSW Department of Planning and Environment (**DPE**) and multiple Government and non-government agencies following the submission of the response to submissions (**RTS**) document for the proposed Jalco Manufacturing Facility State Significant Development Application (**SSDA**), identified as SSD-21190804, on the 25 February 2022.

During the exhibition period of the SSDA between December 2021 and January 2022 the application received seven submissions all from Government and non-government agencies who requested further information be provided. Following submission of this information in February 2022, a further five requests for information was made based off the RTS information.

This letter and subsequent response table has been prepared to address the matters raised by the DPE and relevant agencies to ensure the DPE are able to make an informed assessment of SSD-21190804.

This letter is accompanied by the following documentation, which comprehensively addresses the issues raised by the relevant agencies:

- **Attachment A:** Costin Roe Letter on Stormwater Management
- **Attachment B:** Acoustic Impact Assessment
- **Attachment C:** Air Quality Impact Assessment
- **Attachment D:** Traffic Impact Statement
- **Attachment E:** Lot 201 Operational Traffic Management Plan
- **Attachment F:** Polex Report on Extractors
- **Attachment G:** Architectural Fit Out Plans

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The accompanying documentation addresses each of the issues raised by the DPE and relevant agencies, as summarised in **Table 1** (overleaf).'

We trust the information submitted with this response letter will adequately address the outstanding matters raised by the agencies following the previously submitted RTS for SSD-21190804.

Should you require any additional information regarding the matter please do not hesitate to reach myself at the undersigned, or Jacqueline Parker on (02) 8233 9969.

Kind regards,

John Booth
Senior Consultant
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Table 1 Requested Further Information

Matter for Consideration	Response
Fairfield City Council	
Traffic Related Matters	
It is expected that the truck movements at the Smithfield Site will be the same for the proposed Lot 201 Site.	Yes, that is correct.
Heavy vehicle movements are distributed evenly across the 24-hour period for the Horsley Logistics Park Site, there will be a maximum of 3 hourly heavy vehicle movements resulting in 57 movements per day.	The heavy vehicle numbers are consistent with the approved operational management plans including the Noise Verification Report for Lot 201, as approved under SSD-10436 and as modified.
All issues raised by Transport for NSW shall be satisfactorily addressed prior to determination.	Noted. TfNSW has been consulted as part of the SSDA process. All items associated with TfNSW have been responded to as part of the RTS submitted to the DPE on the 25 February 2022, of which they requested no further information following its submission. Therefore, TfNSW items have been satisfactorily addressed for this SSDA.
A Loading Dock Management Plan (LDMP) and Operational Traffic Management Plan (OTMP) shall be prepared to the Council's satisfaction and appropriate measures shall be implemented to prevent additional trucks from entering the site when loading docks are fulling occupied. In addition, the traffic management plans	An Operational Traffic Management Plan (OTMP) has been prepared as part of SSD 10436 (refer to **Attachment E**) for Lot 201.

Matter for Consideration	Response
should outline measures in place to minimise potential conflicts between truck movements and other users.	The assumptions in the OTMP consider Jalco's future use. It demonstrates the site can operate satisfactorily for the future use. A Loading Dock Management Plan can be complete as part of a condition of consent for operation.
The applicant shall provide swept path diagrams to demonstrate that the largest vehicle (26m B-Double vehicle) can satisfactorily turn into and out of the site to access Lot 201 Warehouses 2A and 2B without crossing the double barrier lines on Johnston Crescent.	Warehouses 2A and 2B do not form part of this application. The turning movements in and out of this portion of the warehouse was assessed under SSD-10436 Modification 1 and approved on 04 August 2021. This comment is not relevant to Jalco's proposed use and operation.
<u>Environmental Management</u>	
NSW EPA is the appropriate regulatory authority. All matters raised by NSW EPA shall be satisfactorily addressed prior to determination.	Noted. The EPA have been consulted as part of the SSDA process, with comments responded to in the RTS document submitted to the DPE on the 25 February 2022, and with additional comments addressed below in this table.
The proposal shall demonstrate it will not cause any significant release of odorous and toxic VOCs. The consultant identified dichloromethane to be the only chemical that contain toxic or odours VOC's. The anticipated dichloromethane consumption is based on a	As very small quantities of dichloromethane are used, exceedances of the impact assessment criteria are highly unlikely. It is assumed that: 1) Dichloromethane is used at a rate of 0.5 litres per hour

Matter for Consideration	Response
monthly usage. Impact assessment criteria for principal toxic air pollutants in the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW is based on hourly usage. The consultant shall anticipate VOC's consumption based on hourly usage or alternatively that consultant shall provide a clear statement advising that the anticipated VOC's emissions will comply with Impact Assessment Criteria present within the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW.	2) 50% of all dichloromethane used is evaporated 3) All dichloromethane is used within the dispensary which is ventilated at a rate of 4.5 m^3/s 4) The carbon filtration system absorbs dichloromethane at 90% efficiency The in-stack concentration of dichloromethane is estimated to be 2.05mg/m^3, which is well below the criterion of 3.19mg/m^3. Given the height and exhaust velocity of the stack serving the dispensary, and as shown by result of the odour modelling, emissions from the stack will be diluted several thousand times (>4,000) prior to emissions from the stack reaching the nearest receptor. This would effectively reduce ground level concentrations to a fraction of the impact assessment criteria. Refer to the Air Quality Impact Assessment at **Attachment C** for further information.
Table 11 Predicted Odour concentration at Residential Receptor and Figure 14 Odour Impacts, present within the report demonstrates the predicted odour impact that identified receivers are to experience. The Table displays that the odour concentration predicted at all surrounding residential receptors are below the relevant odour criteria of 2ou. It is then further indicated that all commercial receptors are predicted to experience odour concentrations (average across the entire	The adopted pollution control system design (refer Section 2.3 in **Attachment C**) is predicted to achieve compliance with the adopted odour impact assessment criteria at all locations with the exception of one carpark receptor, where the predicted odour concentration is 2.0 odour units (refer Section 7 in **Attachment C**).

Matter for Consideration	Response
commercial site) below the 2our criterion with the exception of receptor C1 which is predicted to experience an exceedance of 2.8 ou which the consultant considers marginal. A revised dispersion modelling assessment must include various pollution control strategies until compliance is achieved in accordance with the NSW EPA Approved Methods for Modelling and Assessment of Air Pollutant Guidelines.	It is noted that the adopted odour impact assessment criterion is conservative. Based on previous discussions with the NSW EPA, the odour impact assessment criterion is recommended to be determined through identifying the area within the two-odour unit isopleth and multiplying this area by the relevant average population density of 500 people per square kilometre for the Site, the affected population for the worst-case sensitivity scenario modelled would be less than 30, which means an odour impact assessment criterion of 5 ou may be appropriate.
The consultant has stated that the WWTP is identified to be a relatively large odour source, with a 28% contribution to total odour emissions from the site. A ground level impact contribution analysis was performed and revealed that the impacts from the WWTP ranged from <0.1ou to 0.4ou at the modelled residential receptors. There is no mention of the odour modelling impact of the WWTP undertaken on the identified commercial receptors. The consultant shall also undertake an odour modelling impact contribution analysis and present the ground level concentration contribution of the WWTP will have on modelled commercial receptors.	Refer to Section 7 in **Attachment C** Air Quality Impact Assessment for source contribution for all receptors.
An odour control strategy for the WWTP has been provided by the consultant which demonstrates an approximate 50-90 per cent reduction in odour impacts at	Given the proximity of the WWTP to the worst impacted commercial receptors, higher odour reductions are predicted for these commercial receptors. Refer to Section 7 in **Attachment C** for further information.

Matter for Consideration	Response
residential receivers. The consultant shall demonstrate how much odour reduction will occur at commercial receptors as a result of the odour control strategy.	
The consultant has indicated that the proposal proposes to operate on a 24/7 basis with a proposed maximum annual average product throughput of 208,100 tonnes per annum and 57 heavy vehicles and 317 light vehicle movements per day over 3 shifts. This is significant increase from what was stated previously. A revised Operational noise impact assessment shall reflect the changes in vehicle movements.	Refer to Section 7.1.1 in the Air Quality Impact Assessment at **Attachment B**.
Western Sydney Airport	
Response to Submissions – Matters which are raised at Points 3 to 5 of our previous submission will need to form conditions on any future development consent.	Noted.
Response to Submissions – The data provided at Table 5/ Section 5.2 of the Air Quality Assessment needs to assess impact of air emissions at the Obstacle Limitation Surface (OLS). This would include confirmation of any impact of air emissions from the emission point at the OLS height. The current data only identifies the impact of emissions at the source of emissions.	Jalco have submitted a CASA form 1247 Operational Assessment of a proposed plume rise to CASA to determine if a risk to the safety of aircraft operations is a matter that would require further assessment. As outlined in Form 1247: *It is for CASA to determine such an outcome given all considered input which is to be assessed whether it may create a risk to the safety of aircraft operation.*

Matter for Consideration	Response
	It is noted that Form 1247 deals with the impact of plume velocity at the Obstacle Limitation Surface (OLS). Air quality impacts at OLS are not considered to be likely and are not routinely addressed for transient receptors such as an airplane passing through the area at velocities greater than 67 m/s (aircraft landing speeds).
Appendix H – We note that WSA is identified as the relevant Commonwealth authority in accordance with Schedule 3 Dictionary for Chapter 4 of the SEPP (Precincts – Western Parkland City) 2021, and therefore this process would satisfy the relevant consultation considerations identified within the response to submissions once the above information in relation to the OLS is confirmed.	Noted.
Fire & Rescue NSW	
That an Emergency Response Plan (ERP) be developed to specifically address foreseeable on-site and off-site fire events and other emergency incidents (e.g. LPG unloading incident ignition and fire, flammable liquid store fire or potential hazmat incidents).	Noted. This will form part of the OEMP.
That the ERP detailed the appropriate risk control measures that would need to be implemented in order to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards). Such measures would include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures,	Noted.

Matter for Consideration	Response
minimum evacuation zone distances and a safe method of shutting down the automated storage system (either in its entirety or partially, as determined by risk assessment).	
Other risk control measures that may need to be implemented in a fire emergency dur to any unique hazards specific to the site should also be included in the ERP.	Noted.
That two copies of the ERP are stored in a prominent “Emergency Information Cabinet’ which is located in apposition directly adjacent to the site’s main entry point/s.	Noted. This will form part of the OEMP.
That an Emergency Services Information Package (ESIP) be developed as detailed in FRNSW guidelines – Emergency Services Information Package and Tactical Fire Plans for use by responding firefighters. It is to be stored along with the ERP in an ‘Emergency Information Cabinet’ which is located in a position directly adjacent to the site’s main entry point/s.	Noted. This will form part of the OEMP.
Environmental Protection Authority	
The EPA recommends that the proponent provides information on the expected control design and performance of air emission and pollution control equipment, and that additional assessment is undertaken to demonstrate compliance with EPA’s impact assessment criterion. The EPA recommends the proponent provides:	Refer to the following sections in the Air Quality Impact Assessment (**Attachment C**) in reference to the EPA’s numbered items. 1. Refer to Section 2.3, Appendix B and Appendix C

Matter for Consideration	Response
1. a description of all aspects of the air emission control system, including fugitive emission capture, treatment, and discharge systems 2. plan, process flow diagrams and descriptions that clearly identify and explain all pollution control equipment and expected emission performance 3. manufacturers guarantee or similar, to confirm the expected emission performance of the scrubber system 4. additional assessment to demonstrate the project complies with EPA's impact assessment criterion 5. a sensitivity analysis that explores the contributions the uncontrolled building vents have on potential offsite impacts	2. Refer to Section 2.3, Appendix B, Appendix C and Appendix H 3. Refer to Section 2.3 and Appendix B 4. Refer to Section 7 5. Refer to Section 8
The EPA recommends the proponent provides: 1. The predicted noise level from the Jalco premises only at all assessed receivers presented as both a table of results and noise contour maps for all assessed meteorological conditions, operating scenarios and time of day (day, evening and night). 2. An exhaustive list of operating hours for all activities and processes assed in the application	Refer to the following sections in the Acoustic Impact Assessment (**Attachment B**) in reference to the EPA's numbered items. 1. Refer to Section 7.2.3 2. Refer to Section 7.1.4

Matter for Consideration	Response
The EPA recommends, prior to project approval, the proponent provide: 1. A description of all aspects of the air emission control system, including fugitive emission capture, treatment and discharge systems 2. Plans, process flow diagrams and descriptions that clearly identify and explain all pollution control equipment and expected emission performance 3. Manufacturers guarantee or similar, to confirm the expected emission performance of the scrubber systems	Refer to Section 2.3, Appendix B, Appendix C and Appendix H in **Attachment C**.
The EPA recommends additional assessment be undertaken such that the project is demonstrated to comply with EPA's impact assessment criterion. This could include the following: ▪ Use of more refined level of assessment ▪ Adopt additional mitigation measures and/or controls such as a commitment to enclose the WWTP as assessed in the Response to Submissions, Revised Air Quality Impact Assessment ▪ Redesign the activity/ location of emission sources away from receptors	Refer to Section 7 in **Attachment C**.
The EPA recommends the AQIA be revised to include a sensitivity analysis that explores the contributions the uncontrolled building vents have on potential offsite impacts. This should consider variations in discharge concentrations and the	Refer to Section 8 in **Attachment C**.

Matter for Consideration	Response
resulting predicted offsite contributions. Where the sensitivity analysis identifies risks to offsite impacts, additional mitigation measures should be nominated to address those risks. This may include the provision of better dispersion via increased building vent heights or additional controls.	
NSW Department of Planning & Environment	
Please clarify this statement '*To minimise disruption on the production line, the dangerous goods are located to minimise disruption and enable ease of access when the material is required*'.	The internal fit out of Jalco's warehouse cannot accommodate dangerous goods due to the racking layout, bottle storage and filling lines. Therefore, it was determined the Dangerous Goods store and Class 3 Store to be located on the handstand areas.
The RtS, in Appendix A – Dangerous Goods Storage Process Map provides that there would be substantial handling of DG's including deliveries to external storage areas and moving DG's externally into the production area via forklift when needed. This has the potential to cause contamination of the stormwater system in the case of a spill or fire. The Stormwater Management Plan prepared by Costin Roe and dated 28 May 2021 (Appendix F of the RtS) is for the use of the site as a warehouse and does not include measures to capture and retain contaminated water in the external areas where dangerous goods are stored and handled. ▪ The external potentially contaminated hardstand areas should be separated from the clean stormwater areas similar to the Smithfield facility as described in the Contaminated Water Retention Plan (Appendix P of the EIS). Please provide	A pollution control valve will be implemented in the stormwater drainage system for Lot 201. In the case of a spill or fire, the pollution control valve will be automatically closed to prevent contamination of the stormwater system leaving the site. Costin Roe have prepared a letter outlining this mitigation measure, refer to **Attachment A**. Further, the maximum volume of Class 3, which will be transported across the site, would be 200 litre drums. In the case of Dangerous Goods store, the maximum amount of liquid transferred at a given point would be 1,000 litre Intermediate Bulk Container (IBC).

Matter for Consideration	Response
details of the contaminated water retention system isolated from the stormwater system.	In an event of a spillage, Jalco has spillage kits distributed across the site. These kits bund the spilled liquid and would be manually pumped into an IBC or drum for safe disposal.
A sufficient justification for the external storage of DGs has not been provided. Further justification is required, this should include liquid truck filling area bunding details and the controls and management measures proposed to avoid spills.	Given the internal racking, bottle storage and manufacturing requirements, the external storage of Dangerous Goods is required to accommodate site requirements. Most dangerous goods will be delivered via tanker trucks. These trucks park directly in the liquid filling area and connect to a hose, which feeds directly into the warehouse. Three Dangerous Goods trucks would attend the site per day. The liquid filling stations significantly minimise the risk of dangerous goods spillage, as the technology and infrastructure seamlessly connect between the truck and the tanks within the warehouse. For dangerous goods to be located in the Class 3 and Dangerous Goods store within the hardstand, an employee would be accessing and moving these product 24 times/day. A dangerous goods delivery truck for IBCs and 2000L drum to occur once per day. Within the storage area itself,

Matter for Consideration	Response
	there will be the appropriate bunding and construction to ensure any spillage would be managed in its contained structure. In relation to spillage with transporting product across the site, refer to the previous response above.
Provide contingency measures should the WWTP be out of commission or require maintenance.	The Wastewater Treatment Plant (WWTP) has a 50 kilolitre (KL) tank and a 30 KL additional storage tank. This volume would be enough to cater for 36 hours of production volumes. If the breakdown is more than 24 hours, a pump out would be implemented to empty the balance tanks so production can be continued without issue.
Provide a quantification of contaminated water in the case of a fire and how the proposed building, bunding and internal and external water conveyance systems can cater for the expected volumes.	The entire Lot 201 warehouse has been designed to cater for the following: ▪ 500 cubic metre sprinkler tank to accommodate a 2-hour fire event across the site; and ▪ 2,360 cubic metre OSD tank which would capture water runoff from a fire event.

Matter for Consideration	Response
	If a fire event occurs, there is an automatic point valve cut off from the site to the broader stormwater network. The water during a fire event would be held in the sprinkler tank and the OSD tank. Once the fire event has passed, this water will be treated for contamination and pumped out prior to be integrated into the broader network.
An onsite Loading Dock Management Plan is required to ensure conflict between the unloading of DG's and loading and unloading of product does not arise.	Noted. To form part of a condition of consent.
The Traffic Assessment assumed that the addition of night time hours will evenly distribute heavy vehicles to be representative of the Smithfield facility at peak hours. Provide additional justification that night time operations would be fully representative of daytime operations.	The truck movements have been updated to reflect the approved noise verification report for Lot 201 and the acoustic report prepared for Jalco's use and fit out. Refer to **Attachment D** for the breakdown of information.
A breakdown of heavy vehicles (type and amount per day) proposed to access the site has not been provided. Please update the RtS.	The Traffic Assessment (**Attachment D**) has been updated to reflect anticipated truck movements within site. Further, these truck movements are consistent with the Noise Verification Report for Lot 201 and the Noise Report for Jalco's use and fit out (**Attachment B**).
The RtS suggests that "in SSD-10436, truck movements were restricted for Lot 202 during	The Traffic Assessment and Noise Report have adopted consistent traffic generation rates associated with Jalco's operations. These rates have

Matter for Consideration	Response
night time to mitigate against any negative externalities associated with noise. This SSDA did not restrict vehicle movements inbound or outbound during any period of the 24/7 operations at Lot 201. The Department notes the final Noise Assessment prepared for SSD 10436 states: ▪ *the Lot 201 night-time peak scenario includes 10 two-way heavy vehicle movements, which has been modelled as five HV arrivals and five HV departures in a 15-minute period. In the event that the duration of individual low speed movements was extended due to additional manoeuvring (increasing SWL), this would also limit the number of vehicle movements that could reasonably be expected to occur in a 15-minute assessment period (decreasing SWL).* ▪ *[and] "The initial modelling assumptions would be revisited during detailed design when vehicle routes, site layouts, peak vehicle movements and specific operator information becomes available. In the event that higher noise levels are predicted, additional feasible and reasonable noise mitigation options would be assessed."* Provide clarification that a maximum of five heavy vehicle movements in any 15-minute night time period would result from the operations of all tenancies within Lot 201.	been previously adopted in the Noise Verification Report for Lot 201, which was approved by the DPE. The acoustic report demonstrates that the warehouse can operate 24/7, including truck deliveries, without producing significant noise disruption to surrounding receivers. Refer to the revised traffic report and noise report at **Appendix D and B**.