

Mr Jeremy Perera  
General Manager

DGL Group Limited  
11 BODEN ROAD  
SEVEN HILLS NSW 2147

06/05/2022

Dear Mr Perera

**Unanderra Liquid Waste Treatment Facility (SSD-8304)  
Request for additional information**

I refer to Response to Submissions for the Unanderra Liquid Waste Treatment Facility (SSD-8304).

We require the following additional information:

**Air Quality Impact Assessment (AQIA):**

- The original AQIA submitted with the EIS provided predictions for the incremental and cumulative impacts of NO<sub>2</sub> in Table 7-3. It is not clear if these predictions are still relevant for the proposal. Based on the advice in the Advitech report and subsequent modelling in the Todoroski Air Sciences letter (dated 15 December 2021), there are not expected to be any NO<sub>2</sub> emissions from either of the on-site operations (i.e. the BRP or the LWTP). Please clarify.
- The updated air quality modelling in the Todoroski Air Sciences letter (dated 15 December 2021) provides updated predictions of a range of pollutants, including lead. Please provide an assessment of the cumulative impacts of lead (Pb) emissions based on the updated emission rates in the revised AQIA or justify why a cumulative impact assessment has not been carried out.
- The Advitech report has informed the updated site operations emissions inventory and air quality modelling in the Todoroski letter dated 15 December 2021, which includes emissions of hydrogen sulphide. Please demonstrate the hydrogen sulphide emissions will not cause off-site odour impacts.

**Noise Impact Assessment (NIA):**

Construction Assessment:

- The NIA does not provide a definite set of construction noise criteria for the project based on the measured RBL. Please update the NIA to address.
- Please clarify the following conclusions in Section 8 of the NIA:
  - the proposed plant and equipment was modelled as generating similar noise levels. However, it is not clear what comparison is being made as the SWLs provided relate to truck loading and truck movements
  - the operational noise criteria are referred to as being less stringent. However, the operational noise criteria set out in Table 5-3 of the NIA would be more stringent than the

construction noise criteria of RBL + 10dBA (56dBA for the daytime period). Please update the NIA to clarify.

- the conclusion refers to the modelling as being the basis for the Applicant's conclusion that there would be no significant risk of construction noise impacts. However, there was no modelling done for construction noise impacts. Please update the NIA.

Operational Assessment:

- The specific plant and equipment to be used during operation within the BRP and LWTP have not been identified within the NIA. Please clarify.
- As there is an existing operation on the site, noise measurements should have been undertaken to verify predictions from the existing operations. If possible, please update the NIA to address this or justify why this has not occurred.
- The assessment of cumulative noise impacts should be based on verified modelling results and/or measured noise levels
- The following additional details are required:
  - the basis for the assumptions made about the sound pressure levels inside the BRP and the proposed LWTP
  - how the sleep disturbance criteria has been established for the project
  - existing operational noise controls and mitigation measures already being implemented at the site.

If available, please provide a copy of the current Operational Environmental Management Plan used on-site.

Please provide the information or notify us that the information will not be provided, by Monday, 30 May 2022. If you cannot meet this deadline, please propose and commit to an alternative timeframe for providing this information.

If you have any questions, please contact Rebecka Groth, on 82751723 or at [rebecka.groth@dpie.nsw.gov.au](mailto:rebecka.groth@dpie.nsw.gov.au).

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sheelagh Laguna'.

Sheelagh Laguna  
A/Team Leader  
Industry Assessments