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Senior Environmental Assessment Officer
Department of Planning and Environment
Locked Bag 5022
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Friday 5 August 2022

Dear Bianca,

RE: Request for Additional Information SSD 9418

I refer to correspondence received from DPE dated 2 August 2022 regarding a request for additional information for SSD 9418 currently under assessment. The application is seeking approval for the expansion of an existing composting facility from 76,000tpa to 200,000tpa at Ravensworth, NSW.

This letter seeks to respond to additional matters raised by Singleton Council and DPE in relation to the subject application.

Information Requested by Singleton Council

Space Urban provides the following response in relation to Singleton Council's comments.

Comment

"The RtS does not consider the adequacy or effectiveness of the existing controls, or the ability of these controls to manage and mitigate the increased impacts expected from the expanded operations".

Response

As provided in the RTS report (June 2022), mitigation measures have been updated and revised from those implemented under DA140/2016 and have also been further revised from those provided in the EIS (2019).

All assessment reports prepared for the EIS proposed mitigation measures (where applicable) that are far more onerous than those proposed in the SEEs prepared for DA140/2016 and subsequent modifications (refer to Table 6.1 of SEE prepared by Jacobs, February 2018, for a summary of existing mitigation measures).

Whilst mitigation measures implemented for the existing 76,000tpa operations have proven adequate, a revision of mitigation measures has occurred for the 200,000tpa operations which considers the increased scale of the proposed development. These mitigation measures are considered to be best practice and adequate to minimise the impacts of the expanded development.

At the request of DPE, a revised and consolidated Statement of Commitments has been prepared and is provided as **Attachment A**.



Comment

"The RtS states the existing management plans (groundwater management plan, composting management plan, etc.) will be updated post-determination. These plans were developed for the existing facility (DA140/2016) and should be updated to support the expanded operations and submitted with the RtS".

Response

As is the normal process for a SSD, any new or revised operational management plans required are prepared and signed off by DPE post approval of the project. It is unreasonable for Council to request operational management plans at this stage of the assessment process when there is no guarantee that the expanded project will be approved. These management plans will be prepared and/or updated should the project receive approval. The consent would be conditioned accordingly requesting these operational management plans.

Comment

"The Traffic Impact Assessment (Rev 1, dated 23 October 2020) does not consider the other local roads (i.e. other than Lemington Road) that may be used to transport material to/from the site and the impact of the additional heavy vehicles movements on these roads".

Response

The revised Traffic Impact Assessment prepared by Pavey (October 2020) has provided additional detail and assessment of haul routes, including local roads in the vicinity that may be used. As stated on Page 6 of the revised TIA:

"The principal haul roads in the vicinity of the site are New England Highway and a short section of Lemington road. All deliveries of incoming product are sourced local from adjacent power stations and mines or from further afield in Newcastle, Central Coast and Sydney utilising the State Road Network of Pacific Motorway, Hunter Expressway and New England Highway.

No vehicle movements are anticipated to travel south along Lemington Road to the Golden Highway due to lack of end-users in this direction and the narrowness of the road particular at Moses Crossing (one lane causeway over the Hunter River)".

There are no other local roads proposed to be used.

Trucks will utilise major road roads as they are the most efficient means to receive waste and distribute finished products. Refer to Figures 4.1, 4.2, and 4.3 of the TIA for the designated haul routes.

Further to the above, on 5 July 2022 TfNSW stated:

TfNSW has reviewed the Response to Submission Report, prepared by Space Urban, and dated 20/06/2022 and raises no objection to or requirements for the proposed development as it is considered there will be no significant impact on the nearby classified (State) road network.

Whilst it is acknowledged that TfNSW has no jurisdiction over local roads, they have reviewed the revised TIA, including haulage routes, and have no issues.



Information Requested by DPE

Space Urban provides the following response in relation to DPE's comments.

Comment

"The Traffic Impact Assessment (Rev 1, dated 23 October 2020) states the peak additional truck movements would be 114 (in and out) per day based on the increased annual production capacity of 200,000 tonnes per annum. However, the wheel-generated dust predictions provided in the Air Quality Impact Assessment (Rev 2, dated 9 August 2019) assumes a peak scenario of 108 heavy vehicle movements per day. Clarification is sought on this discrepancy and updated studies provided, as required".

Response

It is acknowledged that there is a slight difference in the traffic numbers provided in the Traffic Impact Assessment (Pavey, Rev 1, 2020) and the Air Quality Impact Assessment (AED, Rev 2, 2019). As stated on Page 44 of the Air Quality Impact Assessment:

"As there are minimal light vehicle movements (eg. due to staff and visitors) the focus of the dust assessment has been on the movement of heavy trucks that deliver waste streams and/or remove product from the site".

Light vehicle movement is considered a very low contributor to the overall dust emissions from the development.

Comment

"Noting the amendment of the development application, you are requested to provide an updated list of management and mitigation measures (Table 48 of the EIS). The revised management and mitigation measures will form part of the development consent".

Response

An updated **Statement of Commitments** is provided as **Attachment A**.

Comment

Requested verbally – please provide an updated table showing the amount of each waste type to be received onsite.



Response

Table 2 – Volumes of Wastes to be Accepted Annually

WASTE TYPE	ANNUAL AMOUNT (TPA)	STATE OF WASTE RECEIVED
Garden Organics	110,000	Mulched and screened
Biosolids	25,000	Dewatered – for blending
Paper Crumble	10,000	Shredded – for blending
Urban Wood Residue	2,500	Shredded – for blending
Natural Organic Fibrous Material	2,500	Shredded – for blending
Recycled Water from Bayswater Power Station	25,000	Raw – for blending and compost maintenance
Animal Wastes (manure)	5,000	Raw – for blending
Hydro-excavated drilling mud	20,000	Raw – transfer only to another facility for processing
Total	200,000	

We trust this response resolves the outstanding issues, however, should you require any further clarification or information please contact the undersigned on 0419 715 665 or smithsk@spaceurban.com.au.

Regards

A handwritten signature in black ink, appearing to read "S. Smith".

Shaun Smith
Principal Environmental Planner
Space Urban Pty Ltd

Attachment A – Revised Statement of Commitments



ATTACHMENT A

Attachment A - Revised Statement of Commitments

ENVIRONMENTAL ELEMENT	COMMITMENT
Air Quality	<p>The following odour mitigation will be implemented for the expanded development:</p> <ul style="list-style-type: none"> • A revised Compost Management Plan is to be prepared prior to the development increasing operations at the site. • Staff will receive training on methods to reduce odour generation. • Onsite dams, stormwater, and leachate to be suitably managed through separation of clean and leachate runoff, reuse, and sampling. • Only approved wastes will be accepted onsite. • Windrows will be managed in accordance with site operational procedure for windrow construction and maintenance. • All odorous wastes are to be mixed immediately with less odorous wastes to reduce odour generation. Where this is not possible odorous wastes will be covered temporarily with green waste or saw dust. • Homogeneous mixing will be undertaken. • Compost materials will be watered to a moisture content such as not to create an anaerobic environment. • Odour monitoring will be undertaken as required should an issue be identified at a sensitive receiver. <p>The following greenhouse gas mitigation will be implemented for the expanded development:</p> <ul style="list-style-type: none"> • Whenever practicable, vehicles to leave site with full loads to reduce the number of traffic movements and diesel consumption. • All vehicles/plant and machinery will be turned off when not in use and regularly serviced in accordance with manufacturers specifications to ensure efficient operation. • The use of alternative fuels and power sources for construction plant and equipment will be investigated and implemented, where appropriate. • Recycled materials will be incorporated into the project where possible. • The energy efficiency and related carbon emissions will be considered in the selection of vehicle and plant equipment. • All vehicles and machinery will be fitted with OEM exhaust systems to ensure exhaust emissions are within accepted standards. <p>The following dust mitigation will be implemented for the expanded development:</p> <ul style="list-style-type: none"> • Hardstand pads and the internal roadways will be regularly watered to suppress dust using site water carts. • Staff will undertake visual inspections of dust generation to ensure dust is not spreading beyond the site boundary. • Loads leaving the site will be required to be watered and tarped to prevent dust generation. • Windrows and stockpiles will be maintained by water cart and will have a minimum moisture content of 45%, with increased watering to occur prior to adverse weather conditions. • A site weather station will be utilised to inform of onsite weather conditions which will dictate operational activities. • During excessive wind conditions, loading activities will be reduced until more favourable conditions prevail. • Staff will receive training on methods to reduce dust generation.
Surface Water and Groundwater	<ul style="list-style-type: none"> • Surface and Groundwater Management Plan to be updated to include the expanded facility. • Limit fuels and chemicals stored onsite to a minimum. • All required chemicals and fuels must be located within a bunded enclosure located away from drainage lines and stormwater drains. • Plant and equipment must be regularly inspected and serviced to limit risk of oil loss.

- Refuelling of vehicles or machinery is to occur within a containment or hardstand area.
- designed to prevent the escape of spilled substances to the surrounding environment.
- Wash down areas must be appropriately constructed to capture and treat all wastewater, with collected solid material disposed off-site to a licensed facility.
- All staff to be appropriately trained in the spill response plan for the minimisation and management of unintended spills.
- A high standard of site housekeeping is to be maintained to limit risk of gross pollutants entering surface waters (i.e. construction waste, litter).
- All reasonable and practicable measures must be taken to prevent pollution of any existing waterways as a result of silt or untreated leachate run-off, and oil or grease spills from any machinery.
- Wastewater for cleaning equipment must not be discharged or indirectly to any watercourses or stormwater systems.
- Exposed bare earth areas within the composting facility site must be minimised. Unused areas are to be revegetated.
- The facility must be designed to prevent surface water from mixing with the organics received and processed at the premises and the final products, process residuals and contaminated materials stored at the premises. This includes:
 - Drains and spillways.
 - Bunding.
 - Sediment controls during construction.
- Clean stormwater must be diverted around waste and leachate catchments through the installation of clean water catch drains and diversion bunds.
- Maintain surface gradient of the hardstand pad and orientation/geometry of windrows to minimise leachate generation and to ensure that leachate flows directly to the primary detention basin without mixing with compost organics
- Maintain all water related infrastructure, during construction and operation of expanded infrastructure, and operation, designed to maximise runoff and reduce infiltration including:
 - Low permeability base in the composting processing areas.
 - Lining of the leachate dams.
 - Bunding and arrangement of windrows.
 - Perimeter bunding and diversion drains.
- Procedures for testing, treatment and discharge of leachate to be established and implemented, including monitoring anaerobic conditions.
- Undertake aeration of the leachate dam (increase oxygen) if required (i.e. if hydrogen sulphide, dissolved oxygen or pH levels are outside limits).
- Monitor water levels of the detention basin to ensure that the water levels do not drop below the anticipated use of water for composting and evaporation.
- Maintain integrity of hardstand pad by repairs to areas damaged by plant and machinery movements.
- Ensure drains and surface water gradients are free of excess vegetation and debris so that the flow of stormwater or leachate is not impeded, and the moisture / compaction levels achieved in embankment construction are maintained.
- Regular inspections of onsite infrastructure and structural integrity of drains, hardstand, and leachate dam.
- Repair and maintain any cracks observed in the base and side walls of the dam using clay, preferably bentonite or bentonite clay mixture.
- Waste to be accepted at the facility is to be in accordance with the EPA licence. Waste must be effectively vetted so prohibited wastes are not accepted at the facility.
- Waste is only to be received, stored, or processed in areas where the leachate barrier has been installed.
- Monitoring of pollutants must be undertaken as per EPL 7654.
- Leachate collection and storage facilities must be maintained to collect and impound all leachate in accordance with the design storm event.
- Leachate is not to be used for dust suppression on haul roads.

	<ul style="list-style-type: none"> Leachate is to be recycled through moisture conditioning of compost, to drawdown on basin volumes and ensure the design capacity of the basin is maintained for future storm events. Management of windrows and gradients to ensure no ponding or pooling occurs. Depressions must be filled promptly by using screened or sieved overburden. All water that has entered processing and storage areas and water that has been contaminated by leachate must be handled and treated in the same manner as leachate. Leachate must be collected and stored in a lined basin capable of capturing the 1% AEP, 24-hour runoff event. The hardstand pad and basin liner shall be constructed recompacted overburden/clay with an in-situ permeability (K) of less than 1×10^{-9} m/s in accordance with Aurecon (2017). The leachate dam must be designed in accordance with AS 3798-2007 – Guidelines on Earthworks for Commercial and Residential Developments. Leachate basin is to be regularly desilted in order to maintain design storage capacity, without compromising basin liner integrity.
Traffic and Access	<ul style="list-style-type: none"> As there would be no impact on the performance of the local road network, road upgrades are not required. While the traffic assessment concludes that the additional traffic generated by the facility will not adversely impact on road capacity, Bettergrow will, where possible, schedule the bulk of its heavy vehicle movements to avoid the busy morning and afternoon peak hours.
Noise and Vibration	<ul style="list-style-type: none"> As the noise assessment has determined there will be no construction or operational noise impacts from the development, no specific noise mitigation measures or monitoring is proposed. Notwithstanding the above, all employees and contractors are to receive an environmental induction that will include: <ul style="list-style-type: none"> Relevant licence and approval conditions. Permissible hours of work. Location of nearest sensitive receivers. Construction employee parking areas. Designated loading/unloading areas and procedures. Site opening/closing times (including deliveries). Environmental incident procedures.
Biodiversity	<ul style="list-style-type: none"> The establishment of artificial wetlands in the north-western area of the lease area, where small depressions exist, is recommended. Use of a variety of water depths, and planting of native wetland species endemic to the Singleton region is encouraged. Weeds present over the disturbed areas of the site should be controlled/eradicated where feasible.
Bushfire	<ul style="list-style-type: none"> Access Road - A minimum 4m wide access road with 1m shoulders, passing areas every 200m to allow two-way passing of vehicles, and all-weather trafficable is to be provided. Perimeter Road - A minimum 4m wide unsealed all-weather trafficable road around the external perimeter of the compost mounds should be provided to prevent potential grass fires encroaching into the compost facility, or a fire from the compost facility spreading into surrounding grassed areas and properties. Water - A diesel or petrol-powered fire-fighting pump, with at least a 40m long hose with steel nozzle, mounted on a mobile fire tanker unit should be provided. It should be able to pump out water and cart water from the water supply tank/dam, and fight any spot fires caused by ember attack, or self-combustion. An Emergency and Evacuation Plan should be prepared - including details of the site Fire Warden, local Rural Fire Service contact numbers, emergency muster point, fire-fighting appliances and location, first aid kits, and emergency response procedures in the advent of a bush fire. The Rural Fire Service should also be notified of the development once approved so it can be added to their facility register, and details also provided of access and fire-fighting capacity onsite.
Visual	<ul style="list-style-type: none"> As the development site is already adequately screened from view no additional mitigation measures are proposed.

	<ul style="list-style-type: none"> • Design and location characteristics of the development provide sufficient mitigation. • Retention of existing trees within the site are recommended to maintain the existing level of screening.
Aboriginal Heritage	<ul style="list-style-type: none"> • All relevant staff should be made aware of their statutory obligations for heritage under the National Parks and Wildlife Act 1974 and the Heritage Act 1977. This is to be in the form of a heritage induction on site prior to works. • In the unlikely event that disturbed Aboriginal objects are identified during the development then they are to be collected and recorded in accordance with Heritage NSW guidelines and in consultation with the Registered Aboriginal Parties. • In the unlikely event that human skeletal remains are identified, work must cease immediately in the vicinity of the remains and the area cordoned off. • The proponent must contact the local NSW Police who will make an initial assessment as to whether the remains are part of a crime scene or are possible Aboriginal remains. • If the remains are thought to be Aboriginal, Heritage NSW must be contacted via the Environment Line 131 555. • A Heritage NSW officer will determine if the remains are Aboriginal or not. • If the remains are identified as Aboriginal, a management plan must be developed in consultation with the relevant Aboriginal stakeholders before works recommence.
Historic Heritage	<ul style="list-style-type: none"> • All relevant staff should be made aware of their statutory obligations for heritage under the National Parks and Wildlife Act 1974 and the Heritage Act 1977. This is to be in the form of a heritage induction on site prior to works. • In the unlikely event that disturbed objects are identified during the development then they are to be collected and recorded in accordance with Heritage NSW guidelines. • In the unlikely event that human skeletal remains are identified, work must cease immediately in the vicinity of the remains and the area cordoned off. • The proponent must contact the local NSW Police who will make an initial assessment as to whether the remains are part of a crime scene. • If the remains are thought to be of heritage significance, Heritage NSW must be contacted via the Environment Line 131 555. • A Heritage NSW officer will determine if the remains are of heritage significance.
Socio-economic	<ul style="list-style-type: none"> • No further mitigation measures are proposed with regard to socio-economic issues as it is considered that: <ul style="list-style-type: none"> ○ the proposed development will be of net benefit to the community. ○ provide decreased cost and increased social efficiency associated with composting and nutrient recycling. • Ongoing engagement will occur with key stakeholders during construction and operations.
Fire and Incident Management	<ul style="list-style-type: none"> • New storage structures on the site should be constructed to comply with Part E1 (deemed to satisfy provisions) and Part E2.3 (Special Hazards) of the BCA. • A strict no smoking policy should be enforced on site when in proximity of any combustible materials. Smoking will only be permitted in clearly signposted areas. • All water collection points should be checked regularly to ensure their ability to be accessed in an emergency. • Fire extinguishers should be positioned at readily accessible points, including on mobile plant, so that their use in an emergency is not restricted. • All firefighting plant and equipment should be regularly serviced in line with the manufacturer's recommendation. • The temperature of all stockpiles and windrows should be monitored in accordance with established workplace procedures. If temperatures throughout the compost exceed 67°C, then watering is to be initiated to dissipate heat. • All stockpiles and windrows should be sufficiently moist. The moisture content of compost windrows must be kept above 40% weight for weight to retard burning. • In the event of a fire within a windrow, the affected stockpile/windrow must first be suppressed with either the use of water and/or dirt. The stockpile/windrow must then be pulled apart. However, if weather conditions are such that pulling apart the stockpile/windrow is likely to ignite other stockpile/windrows or spread the fire internally

	<p>or externally, (eg dry with moderate/strong winds), the stockpile must not be broken up until conditions are suitable.</p> <ul style="list-style-type: none"> • In the event a fire cannot be extinguished using water or soil, the use of fire retardants should be considered (expert advice should be sought from Fire and Rescue NSW before taking action with retardants). • Once the fire has been extinguished, affected areas should be monitored on a continual basis until materials have cooled. • All fire water should be contained on site. • All staff should be trained in the use of onsite firefighting appliances. • Combustible materials should not be accumulated in areas close to exhausts or engines. • Display emergency procedures and information in the site office or other visible location. • Conduct or participate in site emergency scenarios as required. • Regularly identify and check all site fire extinguishers and firefighting equipment.
Hazard and Risk	<ul style="list-style-type: none"> • All mobile plant and equipment should be fitted with fire extinguishers. • An Emergency Response Plan should be prepared and implemented for the facility. • All staff on site should be appropriately trained in the handling of dangerous goods. • Flammable and combustible liquids will be stored in accordance with AS 1940-2004: The Storage and Handling of Flammable and Combustible Liquids.
Waste Management	<ul style="list-style-type: none"> • The following mitigation and management measures will be applied during construction and operation of the facility. • Plant and equipment should be regularly maintained. • Ordering should be limited to only the required amount of materials. • Materials should be segregated to maximise reuse and recycling. • Routine checks should be undertaken of waste sorting and storage areas for cleanliness, hygiene and OH&S issues, and contaminated waste materials. • Separate skips and recycling bins should be provided for effective waste segregation and recycling purposes. • Training and awareness of the requirements of the WMP and specific waste management strategies will be undertaken. • Contaminated waste will be managed, transported, and disposed of in accordance with licensing requirements. • Off-site waste disposal should be transported and disposed of in accordance with licensing requirements. • Assessment of suspicious potentially contaminated materials, hazardous materials and liquid wastes should be undertaken. • Regular monitoring, inspection and reporting requirements should be undertaken, and findings implemented.