



Our ref: DOC24/180751

Polina Golberg
Department of Planning and Environment
Via: Major Projects Portal

19 March 2024

Dear Polina,

Additional Information Request – Hanson Construction Materials Pty Ltd – Aggregate Recycling (MP08_0143-Mod-6)

I am writing in response to your request for advice from the NSW Environment Protection Authority (**EPA**) about modification application PAE-68211958, submitted by Hanson Construction Materials Pty Ltd (**Proponent**) to modify Development Consent MB08_0143 (**Proposal**) at Boollwarro Parade, Shellharbour 2529 (**Premises**).

The Premises currently holds Environment Protection Licence (**EPL**) No. 2193 to undertake scheduled activities under the *Protection of the Environment Operations Act 1997* (**Act**). If the modification application is approved, the Proponent will be required to apply for a licence variation.

The EPA understands the modification proposes:

- To receive & process <160,000 tonnes of concrete waste per annum.
- To receive & process <40,000 tonnes of 3rd party sourced recycled glass per annum.

The EPA has reviewed the information submitted for the Proposal, including but not limited to, the following documents:

- *Modification Report Bass Point Quarry MP08_0143 Mod 6 Concrete and Glass Recycling (Version 3) – Ethos Urban – 18 December 2023 (Modification Report)*
- *Environmental Noise Assessment Bass Point Quarry Proposed Concrete and Glass*
- *Air Quality Management Plan Bass Point Quarry Expansion (Revision 7.2) – Hanson Construction Materials and Zephyr Environmental Pty Ltd – November 2021*
- *Surface Water Management Plan For the Bass Point Quarry (Revision 5) – Hanson Construction Materials and Martens Pty Ltd – August 2019*
- *Waste Management Plan Bass Point Quarry Extension Lot 22 DP 1010797 – May 2010*

The EPA's key environmental issues are water quality management and odour, and the associated adequacy of the SWMP and AQMP. Additional information relating to these documents is required by the EPA to enable a proper assessment of the Proposal.

The EPA requests that the Proponent provide the information outlined in **Attachment A** to the EPA and to the Department of Planning and Environment.

If you have any questions, please contact Tylah Batistuzo-Hale on (02) 8275 1144.

Yours sincerely

GREG NEWMAN
Unit Head Regulatory Operations

Attachments: 1

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ATTACHMENT A

Additional Information Required

The Proponent should prepare revised reports / documentation that address the management of environmental categories identified below.

WATER

The EPA has reviewed the SWMP and has identified the following items that need to be addressed to enable the EPA to complete our assessment.

1. Leachate Management

Pollution of land and waters may occur if leachate is not adequately managed. Current surface water management controls at the Premises are designed to manage run off from natural crushed rock, however may not be adequate for managing leachate from stockpiles of crushed concrete and recycled glass. The SWMP does not address the potential for the Proposal to generate leachate, detailed where leachate will drain to, or propose leachate management measures.

Recommendation - The revised Modification Report should:

- a. propose tonnage limits on quantities of concrete waste and recycled glass to be stored at the Premises at any one time
- b. identify any pollutants likely to be generated by introduction of rainfall into stockpiles of crushed concrete and recycled glass
- c. assess the adequacy of existing surface water management controls to capture, direct, store and treat leachate from crushed concrete and recycled glass
- d. consider additional controls needed to adequately prevent, capture, store, and treat leachate
- e. consider any changes to EPL 2193 made necessary by findings from a. - c. above.

AIR

2. Odour Management

When crushed, contaminants present on unwashed, recycled glass they have the potential to generate odour. While the AQMP details odour mitigation measures in relation to blasting activities, it does not propose mitigation measures specific to the Proposal.

Recommendation - The revised Modification Report should:

- a. explain if glass material will meet the conditions of the Recovered Glass Sand Order 2014 under the Protection of the Environment Operations (Waste) Regulation 2014 upon receipt at the Premises
- b. identify quality control measures to be implemented to ensure recycled glass is free of contaminants (including leftover residues) prior to arriving at the Premises.

WASTE

3. Reporting requirements

Per the Proposal, scheduled activities of waste storage and resource recovery are proposed to be

undertaken at the Premises. The EPL will require a variation to add these scheduled activities.

Consequently, the Premises will be subject to a number of record keeping and reporting requirements under the Protection of the Environment (Waste) Regulation 2014. The EPA wishes to ensure the Proponent is fully aware of requirements associated with the Proposal.

Further information about requirements applicable to the Proposal is accessible through the documents below:

- [Requirements for licensed waste facilities in NSW](#)
- [Waste Levy Benchmark Requirements](#)
- [Claiming deductions for waste used for an approved operational purpose](#)
- [Claiming Transported Waste Deductions](#)

Furthermore, a financial assurance is typically required for licensed waste facilities in NSW to ensure costs of clean up and remediation are provided for by the licensee.

Further information about financial assurance is accessible through the documents below:

- [Financial assurance](#)
- [NSW EPA Financial Assurance Policy](#)

Recommendation – The Proponent should consider the information supplied through the above resources and, if the Proposal is approved, undertake necessary actions to ensure the relevant requirements are met.