MEMO

ARCADIS Design & Consultancy for natural and built assets

Date	2/08/2021
To	Chris Ritchie
From	Sean Fishwick
Copy to	Sheelagh Laguna, Luke Parker, Jordan Rodgers, Anthea Gilmore, Kristen Branks
Subject	Kings Park Expansion SSD – Response to DPIE Submission

OVERVIEW

The Kings Park Metal Recycling Expansion (SSD-10396) Environmental Impact Statement (EIS) was submitted for exhibition on 17th September 2020 and has entered the response to submission phase. A submission was received from the Department of Planning, Infrastructure and Environment via email on 6th November 2020. The submission comments and responses to each have been provided in the table below.

Comment	General Topic	Response
Landowner Consent		
• The Department notes the existing facility (SSD-5041) is operated by Sell & Parker (the Applicant) and is located on land owned by Trusts associated with the owners of Sell & Parker. Please clarify if landowner's consent is required, and if not, reasons why it is not required. If landowner's consent is required, please provide.	Landowner Consent	Landowner consent was provided on 24th November 2020 to DPIE.
General		
• The Department notes the community and EPA concerns regarding noise and air quality impacts from the existing operations. It is noted that no additional mitigation and management measures are proposed for the current Proposal (SSD-10396). As such, please provide further information demonstrating why and how the existing management measures can be relied upon to mitigate environmental impacts (in particular for noise and air) from the expanded operations.	Mitigation Measures – Noise and Air	Environmental assessment for the Proposal has been prepared in accordance with SEARs (SSD-10396). The assessment found that the existing mitigation measures from the Original Approval (SSD-5041) are sufficient to manage potential impact from the Proposal. To further identify potential areas of noise and air impact, updated noise and air quality assessment (supported by updated monitoring) have been prepared as part of the RtS process. These assessments have been provided in Appendix C and D of the RtS respectively. Both of the updated noise and air quality assessments have confirmed that the current mitigation measures are sufficient for the Proposal. Notwithstanding these findings, Sell & Parker are proposing to increase the height of the noise wall on the south eastern boundary of the Proposal site by around 2.2 metres (along 70 linear metres) to provide further shielding to residents in areas of concern identified through consultation. Further detail on this mitigation measure is provided in Section 6 of the RtS. The Operation Environmental Management Plan (OEMP) will also be updated to accommodate change associated with the Proposal.
• It is stated in the EIS that stockpile volumes would not increase as a result of this development. Please confirm what measures would be put in place to monitor stockpile size and ensure the volumes remain the same as approved by SSD-5041 MOD 3.	Stockpile Volumes	The Stockpile Plan presented in Appendix D of the EIS detailed the locations and volumes of combustible stockpiles located within the Proposal site and has subsequently been amended. A revised stockpile plan is provided as Appendix G of the RtS and is identical to the plan under SSD5041 Mod 3. The nature of scrap metal recycling is such that the volume of inputs (i.e. scrap metal loads arriving at site) fluctuate across the day, week and year. As per existing approved operations, processing activities such as sorting of scrap in tipping areas, loading of scrap into processing equipment will be managed to maintain scrap metal stockpiles

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		within the currently approved limits identified on the revised stockpile plan (Appendix G of the RtS). Sell & Parker aims to clear tipping areas of combustible scrap metal stockpiles (by processing this material) prior to close of business each day with any remaining material sorted into the numbered stockpiles on the plan. It should be noted that there are 14 stockpiles (including the Floc stockpile) for combustible material illustrated on the plan but not all of these stockpiles contain material or are used simultaneously. The stockpile management plan provides sufficient capacity for maintaining the stockpile management at the end of daily operations. During operations the Floc stockpile continues to be managed by ongoing offsite disposal (daily basis) and the working pile would continuously be processed. Similarly, product stockpiles (e.g. shred, aluminium) are managed on an ongoing basis through scheduling of pickups (for offsite re-use, recovery or disposal) or sale to customers (e.g. Steel mills). As described in section 3.4 of the EIS, a capacity analysis was prepared for the Proposal that identified sufficient capacity was available within the existing processing equipment to accommodate the proposed increased throughput.
• The EIS states that the development would help meet higher recycling standards prescribed by China's National Sword Policy. Please explain how the Proposal would help meet higher recycling standards given there are no processing changes proposed.	Higher recycling standards	Sell & Parker currently hold license number A036040008 issued by the AQSIQ agency of the Chinese Government, allowing the export of scrap metal to China. As a result of the implementation of China's National Sword Policy, to continue exporting to China, Sell & Parker was required to install plant with the capability to produce the new purity requirements. This plant was approved and constructed as part of Modification 3 for the Original Approval (SSD5041). An increase in throughput at the Proposal Site would enable a greater volume of scrap metal to be processed to the standards required by China's National Sword Policy that would otherwise be possible if processed by alternative facilities without advanced processing plant.
• It is noted the site has three weighbridges: one entry, one exit and one adjacent to one of the shears. Please explain the purpose of the central weighbridge. If its use is associated with the central entry (non-ferrous material), please explain why its use is not shown on the swept path analysis for those vehicles using the central entrance.	Central driveway purpose and swept path analysis	To safely carry heavy loads in large vehicles, the weight of the load is required to be evenly distributed across each of the axles, see *https://roads-waterways.transport.nsw.gov.au/business-industry/partners-suppliers/lgr/other-information/heavy-vehicles/mass-limits.html*. The central weighbridge is used to weigh, and balance vehicle axel loads of vehicles transporting product off site. Axel loads are manipulated by reorganising material within the load using the crane directly adjacent to the central weighbridge. The majority of vehicles that require load balancing comprise outgoing loads of material (shred) being delivered to steel mills. Most importantly the weighbridge is required to ensure that Sell & Parker meet its heavy vehicle chain of responsibility obligations.

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• NearMap shows that a number of skip bins and truck trays are located to the south of the post shredder processing building, in the location of a number of the proposed stacking spaces and as such within proposed paths of vehicles. Please clarify the purpose of these skip bins and truck trays and whether they will be moved prior to the commencement of any expanded operations and if so, where will they be moved to?	Purpose of skip bins near post shredder building	The area noted within the submission is an area that was at the time of the NearMap image being taken predominantly being used for storage of parts and equipment. The area south of the post-shredder processing building (Building C) may have been used to temporarily store equipment (e.g. skip bins) as part of daily operations when the image was photographed. During operation of the Proposal stacking spaces will be maintained to ensure they are accessible as required and free of stored parts and equipment. Material would be relocated through processing, sale or transport to other Sell & Parker facilities, as required. Some of the skip bins and truck trays will be deployed to customer sites to collect the material for expanded operations.
• According to the processing flow-chart Figure 2-5, the oxycutter feeds into the shear. As such, please explain why the oxycutter capacity has been added to the shear capacity in Table 2-3 when it appears, they would be acting in sequence.	Oxycutter processing	The capacity analysis is a theoretical assessment intended to demonstrate the potential processing capacity of the Proposal site. For this reason it has been simplified. It is acknowledged that the shear is a limiting factor for processing as detailed in Figure 2-5 in the EIS. However, in practice, not all material processed through oxy-cutting would then be required to pass through the shear. Regardless, the removal of the throughput capacity associated with oxy-cutting activities (2,718 tpa) would not substantially change the outcome of the assessment as it only accounts for ~0.34% of the total theoretical output.
• The flood assessment states that the increased processing capacity would be achieved by extending the daily operation time, yet elsewhere in the EIS it is stated that operating hours would not change. Please confirm whether the operating hours would be changing and if the assessment covers these changes.	Discrepancies of operating hours in flooding report	The Proposal does not include a change to approved operational hours. Operations will remain consistent with SSD-5041 Modification 3 for SSD-10396 as detailed in Table 4-2 of the EIS. The reference “extension of the daily operation times” within the Flooding Assessment (Appendix J of the EIS) relates to the length of time during which scrap metal is being processed through the machinery on a given day within the approved operating hours, Specifically, this is a reference to the fact that the machinery will operate more consistently, and efficiently during the currently approved operational hours. Under the current operations, scrap is processed ‘as required’ and is not always processed continuously throughout the approved operational hours. With the Proposal, the period of time during operational hours that active processing is occurring would increase (i.e. the utilisation % of processing plant would increase).
• The assessment for SSD-5041 identified that additional operation of the hammer mill may increase the frequency of explosions. Please	Hammermill explosions	Due to the nature of materials and processes for scrap metal recycling, it is possible that overpressure events will occasionally occur despite restrictions as to what can be brought on to site and loads being reviewed (i.e. lithium batteries hidden in loads). Overpressure events are infrequent (two within the last two years) and isolated events.

Comment	General Topic	Response
demonstrate why this is not applicable to the current Proposal.		However, the Proposal would result in an increase in overpressure risk at the Proposal site as an increase in throughput increases (albeit very slightly) the risk of receipt of hidden non-confirming waste. Mitigation and management measures are in place and would continue to be implemented to manage this risk. These include: • Implementation of the pre-shredder to manage higher risk materials. The pre-shredder has been designed to contain and reduce risk from overpressure events. This acts as a preventative measure prior to the scrap metal entering the shredder. • Only accepting pre-inspected vehicles on site, • Regular inspection of loads and subsequent 'defueling' of any vehicles that have the potential to have residual fuels. • Signage to inform customers of prohibited items. • Supply agreements with key clients committing to not supplying prohibited materials. In response to comments on the EIS Arriscar were engaged to undertake a preliminary risk screening (as described in DPIE's Applying SEPP 33 guidelines) and a Preliminary Hazard Analysis (PHA). This included a semi-quantitative risk assessment of hazardous incidents such as explosion. The PHA has been included as Appendix I of the RtS. Based on a semi-quantitative risk assessment, the Proposal complies with the DPIE's quantitative and qualitative risk criteria for land use safety planning
Capacity		
• More information is required to explain the difference between the approved Project (SSD-5041) and the proposed development (SSD-10396) in terms of operational practices. Noting the Department's earlier request, the EIS still hasn't clearly articulated how the site will almost double the development's capacity with no other changes, including no changes in hours of operation. That is, please describe exactly what changes to operational practices would be applied, how they are different from what has already been approved and quantify how the changes would increase the volume of waste processed.	Operational processing capability	The current constraint on the site's capacity is the prescribed throughput limit within the Existing Approval (SSD-5041), not the sites receiving or processing capability. The questions raised in the submission seem to stem from the assumption that site under the Existing Approval is operating at 100% utilisation in terms of staff, equipment, plant, operational hours and that any increase in throughput would require changes to these elements. As described in previous responses, this is not the case. The Proposal and how it relates to the Existing Approval has been described in Sections 2, 3.4 and 4 of the EIS. As shown in the capacity analysis in Section 3.4 of the EIS, the existing approved machinery has sufficient existing capacity during the approved operational hours to process an increased throughput. Therefore, an increase in throughput at the Proposal site can be achieved, simply by loading product into processing equipment consistently during those operational hours and formalising the processes and requirements surrounding this. For example, once running, the shredder will process all material fed

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		into the infeed conveyor up to its design capacity limit of 140 tonnes per hour (2,100 tonnes per day based on a 15 hour operational day). As such, to increase throughput for this item of processing equipment, greater quantities of material need to be received, in order for it to be fed into the infeed conveyor over any given hour/day to reach the design capacity. The amount of material that can be fed into processing equipment is controlled by two key processes: • Equipment such as loaders and material handlers feeding into processing equipment • Scrap metal being delivered to the facility. **Equipment** There is sufficient capacity and down time in current operation of supporting equipment such as loaders and material handlers to facilitate an increase in throughput. These equipment items and associated processes are not currently 100% utilised. Utilisation of these items could be increased by: • Increasing the rate at which material is loaded by each item of equipment. • Running multiple items (of existing approved equipment) concurrently for longer periods of the day • Scheduling existing staff more efficiently, e.g. increasing shift availability, increasing the number of staff on shift (from the existing staff pool) during busy periods • Training staff formally and informally to increase competence and efficiency in their roles • Increasing the volumes of material available on the tip floor (facilitated by increased waste being delivered). **Scrap metal** As described within Section 3.2 of the EIS (Proposal need and strategic justification) increasing population, consumption patterns and industry growth coupled with a focus on increasing resource recovery are expected to result in an increasing demand for local metals recovery capacity in the future. With relatively few facilities in Greater Sydney with advanced metal recycling capabilities, the proposed throughput expansion is essential for securing Sydney's future metal recover capacity. The increased throughput limit would allow Sell & Parker to capture more scrap metal. More scrap metal arriving at the site would result in greater volumes being available to be utilised by the equipment as described above.

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• Table 2-3 in the EIS provides a summary of processing capacity for the plant equipment. Please also provide a breakdown showing what the plant is processing currently to demonstrate how the increase in overall capacity would be achieved.	Processing capacity	As noted within the submission Table 2-3 in the EIS provides a summary of processing capacity for the plant equipment. The capacity of each of the plant and equipment has not changed since the original EIS and have always been operating below the maximum capacity available. The total capacity of all the plant and equipment on site is estimated at around 800,000tpa. Processing is not calculated per plant and equipment but determined on the volumes and type of material being purchased on a daily basis. The site processed around 340,000 tonnes in the last EPL reporting period. Note that the current constraint on the site's capacity is the prescribed throughput limit (350,000 tpa) within the Existing Approval (SSD-5041), not the sites receiving or processing capability.
Noise		
• Table 6-8 in the EIS contains responses to the community's concerns raised during consultation. The response to noise concerns is to introduce beeper-less signals and improved fencing. Please describe the improved fencing and determine the reduction in noise levels the fencing would provide.	Noise mitigation	A Noise and Vibration Impact Assessment, has been prepared for the Proposal and is included as Section 9 and Appendix H of the EIS. As part of the RtS, a Supplementary Noise Impact and Vibration Impact Assessment (refer to Appendix C of the RtS) incorporating updates to respond to comments received on the EIS has been prepared. To identify potential noise concerns from the Proposal at nearby sensitive receivers, a noise model was developed and updated as part of the Addendum Noise and Vibration Impact Assessment. The updated noise modelling identified that predicted noise levels during operation of the Proposal would comply with the established noise criteria at all sensitive receiver locations. During operation of the Proposal, potential noise and vibrations impacts would continue to be managed through existing mitigation measures, identified for the Original Approval (SSD-5041) including the current Noise Management Plan (NMP). Existing noise barriers on site include: • North – Around 10 metres high along Tattersall Road • South – Between 4 to 6 metres high • East – Between 6 to 10 metres high • West – Between 6 to 8 metres high Notwithstanding these findings, Sell & Parker are proposing to increase the height of the noise wall on the south eastern boundary of the Proposal site by around 2.2 metres (along 70 linear metres) to provide further shielding to residents in areas of concern identified through consultation. Further detail on this mitigation measure is provided in Section 6 of the RtS.

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• Representative assessment locations: – The Department recognises that the EPA's Noise Policy for Industry (NPfI) requires an assessment to be undertaken only at the reasonably most-affected location. However, as the NVIA appears to only have presented predicted operational noise levels at one (1) receiver location due east of the site, it is not clear if Location R1 is indeed the most-affected location in the Blacktown catchment area. Please provide noise contours showing the range of predicted operational noise levels for residential receivers from Sunnyholt Road to the highest location above sea level along Anthony Street, covering an assessment radius of around 700 metres from the eastern site boundary. – Please provide comment on the variation in LA90 background noise levels across the Blacktown catchment area and whether the Project noise trigger levels applied to R1 can be applied to residences along Anthony Street (east of Charles Street). Intrusiveness noise levels may need to be revised subject to confirming the reasonably most-affected location in the Blacktown area. – The Blacktown residential area bounded by Vardys Road, Sunnyholt Road and the Western Rail Line is largely R2 zoning (low density residential). Suburban noise amenity area would apply to this area based on the guidance established in NPfI. Please provide justification of why the urban amenity noise levels were adopted in the current assessment, noting that the suburban noise amenity	Noise levels/locations	A Supplementary Noise and Vibration Impact Assessment (refer to Appendix C of the RtS) incorporating updates to respond to comments received on the EIS has been prepared. - The Supplementary Noise and Vibration Impact Assessment includes noise contours identifying the potential impacts across each Noise Catchment Area (NCA). The representative receiver location for each NCA was selected based on the worst affected receiver within each NCA. - The Supplementary Noise and Vibration Impact Assessment (refer to Appendix C of the RtS) has included additional long term noise monitoring at four locations between 11 February and 24 February 2021 to determine the overall single L_{A90} Rating Background Levels (RBL) and representative ambient L_{eq} noise levels for each assessment period in accordance with the NSW 'Noise Policy for Industry' (NPfI). The updated background noise levels can be found in Appendix C of the RtS. - As per NPfI an urban acoustical environment is an area that is near commercial districts or industrial districts. The residential areas assessed are adjacent to the Kings Park industrial area. The latest background noise monitoring (as provided in Appendix C of the RtS) also confirmed that the RBLs are more in line with the typical background noise levels for an urban environment

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<tr><th>Comment</th><th>General Topic</th><th>Response</th></tr>
<tr><td>area was applied in the NVIA submitted for SSD-5041.</td><td></td><td></td></tr>
<tr><td>• Operational noise modelling assumptions:
– The time-averaged LAeq,15min sound power level presented in Table 7.1 of the NVIA appears to be identical to those adopted in the 2014 NVIA assessment (SSD-5041), which seems to also have come from on-site measurements and data from similar Projects. According to the NPfI, time-averaged sound levels describe a time varying noise by a single value and would therefore increase or decrease depending on noise peaks and the degree of fluctuation over a specified time period. Please clarify how many tonnes of metal are expected to be processed per 15-minute or per hour for annual throughput limits of 90,000 tpa, 350,000 tpa and 600,000 tpa. Further, please include the on-site sound power level measurement survey (incl. measurement methodology, process/activity description, processing/production rate, sound pressure and power level data) undertaken to develop the operational noise model within the NVIA.
– Ground type ‘soft’ appears to have been adopted to model the effects of sound propagation between sources and receivers. Soft ground in calculation algorithms such as ISO 9613-2 and CONCAWE generally represent uncompacted grassland. Please provide clarification of why ‘soft’ ground was selected to predict noise levels surrounding the site and whether it would</td><td>Noise levels/ assessment/ modelling</td><td>- A Supplementary Noise and Vibration Impact Assessment has been prepared and is included as Appendix C of the RtS). The addendum assessment includes updated sound power levels based on attended on-site noise monitoring undertaken on Monday, 8th March 2021. This on site noise monitoring included measurements of individual plant items as well as measurement of activities / processes such as hammer milling and metal shearing, where a number of plant items were operating within an area concurrently and completing typical routine / cycle.. The peak 15 minute / hourly throughput for processing equipment is the same for each the three noted annual throughput limits as it is dictated by the capacity of each item of processing equipment. Table 2-3 of the EIS identifies the processing capacity for key items of plant and equipment, with the hourly throughput reproduced below:
<table><tr><th>Processing equipment</th><th>Operational capacity (tonnes per hour)</th></tr><tr><td>Non-ferrous baler</td><td>10</td></tr><tr><td>Shredder</td><td>140</td></tr><tr><td>Lindemann Shear</td><td>7.5</td></tr><tr><td>Danieli Shear</td><td>17.5</td></tr><tr><td>Oxycutting</td><td>1.5</td></tr></table>- Hard ground has been adopted in the noise modelling for the Addendum Noise and Vibration Impact.
- A detailed wind analysis including an assessment of its significance in accordance with the NSW ‘Noise Policy for Industry’ (NPfI) has been included in the supplementary assessment (refer to Appendix C of the RtS).
- The enhancing effect of temperature inversion has been included in the updated model for the addendum assessment. The updated noise modelling identified that predicted noise levels during operation of the Proposal would comply with the established noise criteria at all sensitive receiver locations, including when the enhancing effect of temperature inversions were considered.
- A verification check to validate the noise model was undertaken during the recent attended noise measurements on site (Monday, 8th March 2021). The verification was conducted at the boundary of the existing site. The verification was undertaken when all day time plant items listed in the addendum report were operating (except for the pre-</td></tr>
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Comment	General Topic	Response
be more appropriate to select 'hard' ground. – It is noted that a prevailing wind condition of 3 m/s was modelled as a feature of the area for R1 in the 2014 NVIA (SSD-5041). It is not clear why the prevailing wind condition has not been applied to residential receivers in the Blacktown area in the 2020 NVIA. Further, it is not clear how the meteorological data at the Horsley Park Equestrian Centre was applied to represent local conditions in the Blacktown locality. Please, at a minimum, provide wind rose plots and an accompanying analysis/discussion. – It is noted that the enhancing effect of temperature inversion on sound propagation was not considered in the NVIA on the basis that the site is situated within an industrial complex with a surrounding urban locality. However, it would appear that the supporting scientific evidence is missing from the NVIA document. Please provide either measurements of inversion parameters or a prediction of wind and temperature profiles in the locality. In the absence of supporting evidence, Factsheet D of the NPfI states that noise-enhancing meteorological conditions would need to be adopted for all assessment periods for noise impact assessment purposes. – Given the site is already operational and the Proposal does not involve physical works, noise modelling of the proposed operations could be validated by measured noise levels in close proximity to the site and at some key residential locations surrounding the site. It is not		shredder and one shear, which were in-operational during the site visit). Measured noise levels were found to be within 1dB of the modelling results.

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clear why measurements were not undertaken to check the validity of noise predictions. Please address noise model validation.		
• NPfI modifying factors to account for annoying characteristics: – The NVIA has not adopted any modifying factors for tonal noise, low-frequency noise, or impulsive noise on the basis of measurements undertaken on site and at other similar metal recycling facilities. Please provide supporting evidence as this information appears to be missing from the NVIA. – While Tables 9.5 and 9.7 in the NVIA reported intermittent vibration levels and Table 4.3 (short-term attended measurement results) reported that intermittent noise and loud bangs were heard, there does not appear to be any recognition of site generated noise having intermittent characteristics in the operational noise assessment. Please provide clarification of why the modifying factor of +5 dB for intermittent noise was not applied for assessing noise between the 6am and 7am shoulder period.	Tonal noise/ vibration	A Supplementary Noise and Vibration Impact Assessment has been prepared and is included as Appendix C of the RtS. As detailed in the Addendum Noise and Vibration Impact Assessment, to address agency comments, additional attended on site noise measurements were undertaken on Monday, 8th March 2021 to capture noise from existing plant and equipment on site and to undertake verification of the noise model with these noise sources. An analysis of these noise measurements and measurements from other similar metal recycling facilities were analysed for tonal or low frequency characteristics as per the methodology prescribed in NSW 'Noise Policy for Industry' (NPfI), and after accounting for acoustic shielding provided by intervening structures between the site and both residential and industrial receptors, is not considered to be tonal or have low frequency characteristics. An analysis of intermittent noise was also undertaken. Modifying factors for intermittent noise is to be applied for the night time period only. During the night time period only plant for maintenance and cleaning activities are utilised. An analysis of noise from plant items used for maintenance and cleaning activities, including forklifts, hand tools, pressure hoses and cranes, found they did not exhibit intermittent character. Therefore, the character of noise as perceived at the receiver location from night time activities is not considered to be intermittent and the modifying factor of +5 dB for intermittent noise was not applied.
Plans		
• It is noted that approximately 30 tonnes of ULABs would be accepted and stored on site for transfer to a recycling facility. Please show where ULABs are stored within the non-ferrous shed and describe how often they are transported off site.	ULABs	ULABs are stored within Building B (non-ferrous shed) on the southern side near the central roller door, however the exact location may change depending on material inflow and the day to day operations of the shed. ULABs are stored in accordance with manufacturers SDS and transported in accordance with ABRI storage and packaging standards. ULABs are collected and transferred from the Proposal site whenever Sell & Parker have acquired 24t (approximately a truck load), (which is currently approximately every ten days) to an EPA licenced third-party ULAB recycler in accordance with best practice.

Comment	General Topic	Response
		There is no processing of ULAB's on site by Sell & Parker, and ULAB's are considered non combustible when stored as set out above. Arriscar have also considered ULABs in the Preliminary Hazard Analysis (PHA) prepared as part of this RtS (Appendix I of the RtS) and Sell & Parker hold an EPL which covers receipt of hazardous waste and lead.
• It is noted a plan showing the locations of all waste stockpiles, that is, not including processed waste, has been provided to address Fire and Rescue recommendations. However, as requested previously, please provide a plan showing the locations and sizes of all stockpiles (including processed waste) for operational purposes.	Waste stockpile locations	A revised stockpile plan showing the location and sizes of stockpiles in accordance with the FRNSW guidelines is provided as Appendix G of the RtS. Appendix G illustrates in blue shading the locations of non combustible material stockpiles.
• Please clarify the use of Building A, as Table 2-2 and Figure 2-3 label it as maintenance workshop and non-ferrous shed respectively.	Building A name	As noted in Table 2-2 of the EIS, Building A is used for storage of large non-ferrous items and as a maintenance workshop. This has been considered in the updated Figure 2-3 (Appendix F of the RtS).
• It is noted that on the site plan the north-western corner of the site contains Building L, a metal awning and 'machinery'. Please clarify what machinery is present at that location.	Machinery located at Building L	As noted in Table 2-2 of the EIS, Building L and the metal awning (as approved in SSD-5041) contain the plant for sorting of non-ferrous outputs from the shredder. The 'machinery' south of Building L on the Site Layout Plan (Appendix C of the EIS) is the shredder. This processes the majority of the ferrous metal arriving at the Proposal site. Metal is delivered in a mix of vehicle types to the shredder tip floor before being fed into the shredder. The shredder produces shred, floc and small quantities of non-ferrous metals. Figure 2-3 (Appendix F of the RtS) has been revised and updated to show these clarifications.
• Please show and label all plant, including those in buildings, on the site plan.	Plant labels on site plan	The Site Layout Plan (Appendix C of the EIS) is intended to display the plant and equipment at a high level. Further details are provided in Figure 2-3 of the EIS which has been revised and updated to include labels for plant and equipment within buildings and is included as Appendix F of the RtS. A description of the plant and equipment is provided in Section 2.4 of the EIS. Specifics of the layout and processes for individual items of processing plant are commercial in confidence and as such have been excluded from the EIS. Specific details and schematics can be provided to DPIE separately on a strictly commercial in confidence basis, if required.

Comment	General Topic	Response
Structures		
• It is acknowledged that the site operates under SSD-5041 MOD 3 and that the buildings and plant locations and design have been assessed and approved. However, as SSD-10396 is a new application, a description of the existing buildings and plant is required along with any approved plans.	Building/Plant descriptions	A description of the site including plant, equipment and structures is provided in Section 2.4 of the EIS and shown on the Site Layout Plan (Appendix C). An updated version of Figure 2-3 has been provided to show plant and equipment locations including those within buildings and is provided as Appendix F of the RtS.
Air		
• It is noted there is an emissions collection system on the hammer mill. Please describe the emissions collections system and how it controls emissions from the mill.	Air - Emissions collections system	The Emissions Collection Systems (ECS) sits adjacent to the shredder (hammermill). the ECS is connected to an extraction hood over the inlet area of the hammermill. The ECS is a cyclonic upward air movement pushing against a downward wet spray system. Warm air and particles are extracted from the fragmentiser drawn via fans into the ECS. The hammermill's emissions are drawn into the base of the unit just above the sump. Heavy particulates within the air column drop out when they enter the ECS and fall into the sump that contains the water utilised for the emissions spray system. If the combined weight of the particle and water droplet are great enough, the particles are pushed against the outer wall of the ECS and drop down into the sump. The downward moving water droplets intercept upward moving air and bind with particulates, dropping the material into the sump. The sump is a separator system that works like a gross pollutant trap. The clean water section includes disinfection systems, where it is used for emissions spray system. The sump is emptied regularly and replaced with fresh water. The filtered air from the unit is transferred via the duct work to the central stack emission point located on the north western corner of building C. This stack has the sampling ports and a conical outlet to help increase the exit velocity which pushes the air higher into the air column and in turn improves dispersion.
Traffic		
• It is noted the assessment identifies peak periods which were used to assess impacts across the scenarios. Please clarify whether	Traffic – peak periods	As noted in Section 7 of the EIS and the TIA (Appendix E of the EIS), the stacking capacity for the Proposal site has been based on existing weighbridge data and looks at the availability of stacking spaces during the Proposal site peak i.e. when the site is operating at maximum throughput.

Comment	General Topic	Response
these are peak periods for the road network or for the facility.		The assessment of traffic impacts on the surrounding road network looks at the potential impacts from the Proposal on intersection performance during the road network peak periods.
• It is noted that swept paths have been provided, however, the plans do not include stockpiles. Please update the plans to include stockpiles and ensure the swept path analysis demonstrates that vehicles can safely access the relevant stockpile.	Swept paths – stockpile locations	A revised stockpile plan showing swept paths and the location and sizes of stockpiles in accordance with FRNSW guidelines is provided as Appendix G of the RtS. The 'revised plan shows that there is no conflict between swept paths and stockpiles.
• Table 6-2 in the traffic assessment provides a Stacking Capacity Assessment, however it is unclear whether the number of vehicles accessing the site in an hour represents peak operational periods. If not, please update the table for peak operational periods	Stacking Capacity	As noted in Section 7 of the EIS and the TIA (Appendix E of the EIS), the number of vehicles accessing the site when operational at 600,000 tpa has been extrapolated using existing weighbridge data. The number of vehicles arriving at the site under the 600,000 tpa is considered to be reflective of the site operating at its peak throughput the operating hours. We have not included any non peak operational periods in our modelling. This assessment is considered to be conservative as: • An average turnaround time has been used to assess stacking capacity which is skewed by infrequent deliveries (e.g. special oversize items), that require substantially longer turnaround times. • It assumes all vehicles accessing the site are B-doubles. In practice, a range of vehicles of different sizes access the site on a daily basis. Several light vehicles could stack in the space assigned for one B double which would significantly increase the available stacking spaces. • It uses conservative load volumes for each vehicle type which results in the total volume of vehicles being overestimated. • It does not consider the ability of vehicles to stack along the western driveway, prior to the entry weighbridge. • Does not consider the ability for vehicles to stack in unused spaces assigned to other processing areas. The stacking capacity assessment demonstrates that the vehicles anticipated to arrive when operating at 600,000 tpa (using conservative assumptions as described) could be accommodated across the available stacking spaces with additional capacity available across a range of areas. As such, it is considered that the Proposal site when operating at 600,000 tpa would have ample capacity to accommodate vehicles arriving at the Proposal Site and could accommodate for fluctuations in the daily arrival numbers that are expected of facilities of this nature.

Comment	General Topic	Response
Fire Hydrant Report		
• The fire hydrant report in Appendix K identified numerous non-compliances. However, the EIS states 'The Fire Hydrant Assessment (Appendix K) identified that the existing fire infrastructure on-site would be able to adequately manage fire risks associated with the Proposal without additional alterations'. Please clarify when and how the non-compliances have been or will be addressed.	Non-compliance list Fire Hydrant Assessment	Sell & Parker are undertaking an upgrades program to address non-compliances related to fire infrastructure as identified within the Fire Hydrant Assessment Report (Appendix K of the EIS). This would be complete prior to operation of the Proposal and would be documented in a Fire Hydrant Close Out Report The compilation of mitigation measures included as section 6 of the RtS has been updated to include this requirement.
Hazards		
It is noted that this SSD proposes to integrate with the existing operation approved under SSD-5041. As such, the Department refers to the original PHA prepared for SSD-5041 by Arriscar in 2014. • Table 12-2 of the EIS provides information on where some of the Dangerous Goods (DG) are to be located, but it appears the table is incomplete. For example, the locations of oxygen, kerosene, argon and LPG are not provided. As such, please provide: – a site layout clearly showing the storage area for each of the DGs stored on the site – clarification of whether Class 3 and Combustible liquids (C1) are stored and will continue to be stored within the same bunded area. Please note, if Combustible Liquid (C1) materials are stored together with Class 3 materials, the entire inventory must be considered as Class 3 material. The storage would include	Dangerous good locations	In response to comments on the EIS a full review and rationalisation of potentially hazardous materials and dangerous goods stored on Proposal Site has been undertaken. As part of this Arriscar were engaged to undertake a new preliminary risk screening (as described in DPIE's Applying SEPP 33 guidelines) and a Preliminary Hazard Analysis (PHA). These have been included as Appendix I of the RtS. A full list of the types and quantities and storage methodology for potentially hazardous materials and DGs is presented in the PHA (Appendix I of the RtS). The volumes listed in the PHA have been confirmed by Sell & Parker and as such have also been updated in the EIS where applicable (in particular to oxygen and lead). The Arriscar assessment found that the Proposal complies with DPIE's quantitative and qualitative risk criteria for land use safety planning and included several recommendations based on the findings of the risk assessment. These recommendations have been incorporated as mitigation measures for the Proposal (see Section 6 of the RtS) and include: • The safety requirements for unloading liquid oxygen to the on-site bulk storage tank should be specified in an appropriate document / procedure (e.g. maintenance of exclusion zone for materials contaminated with oil etc., ensuring clear access to tank, prohibiting oxy-cutting operations during tanker unloading, etc.). Note the unloading of liquid oxygen to the onsite bulk storage is handled by specialist Coregas. However, Sell & Parker will periodically review its operations to ensure all safety requirements are met for these requirements.

Comment	General Topic	Response
tanks, IBCs or small packages with the same bunded area.		• A review and audit of the bulk liquid oxygen storage tank installation should be undertaken to ensure compliance with the requirements of the relevant Australian Standard/s. • It should be ensured that the steel enclosure surrounding the liquid storage tank is structurally secure should there be a release of low temperature liquid oxygen (which may lead to low temperature embrittlement and potential structural failure of the enclosure). This should include consultation with Coregas and a suitably qualified structural engineer. A specific emergency response procedure should be included in the Emergency Response Plan to cover a release of liquid oxygen at the RRF.
• It is noted that oxygen has increased from 3,000 L (as per PHA (2014)) to 16,000 L. Please clarify: – whether the oxygen is stored as compressed oxygen or liquified oxygen – the methodology used to convert litres of oxygen to kilograms of oxygen – the controls that would be used for the storage of oxygen.	DG - Oxygen	
• It is noted that 50,000 kg of lead would be stored on site. Lead has been classified in the EIS as DG Class 6.1. Please provide information on the type of lead (or lead compound) being stored and the method by which the lead (or lead compound) is made (i.e. is the lead from batteries or other sources). Provide the SDS (or equivalent) of the lead material for the Department to confirm its DG classification.	DG - Lead	Note that the lead referred to generally comprises soft dry lead, typically from the building industry (roof flashings, counterweights) and recreation industry (scuba weight belts, fishing sinker weights, boat keels etc). This lead metal is not a dangerous good (refer to the PHA provided as Appendix I of the RtS). Lead is not processed on site. It is collected and loaded in containers for export in the same form it is received. Lead material that cannot fit inside a shipping container is not accepted. We do not accept or buy lead (or lead paste) from ULAB's (it is the complete ULAB that is accepted)
• The Department does not agree with the EIS's conclusion that the SSD does not trigger SEPP 33 as the dangerous goods quantities are under the threshold requirements. In accordance with 'Applying SEPP 33', the subsidiary risk of a DG material is required to go through the risk screening process. As such, 16,000L of oxygen (Class 2.2 sub risk 5.1) potentially exceeds the DG class 5.1 thresholds of 5 tonnes. Please verify the quantities of Class 2.2 sub risk 5.1, Class 6 and Class 8 materials being or to be stored onsite and assess whether the proposed quantity of materials would trigger SEPP 33. If so,	SEPP 33	

Comment	General Topic	Response
update the original PHA or prepare a new PHA in accordance with Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis' and 'Multi-Level Risk Assessment'.		