ATTACHMENT 1

In order to finalise the Department's assessment, additional information is required including but not limited to the following:

1. General

- It is noted that in the Quantity Surveyors (QS) report there is an item listed for 'special equipment' with a value of $80,000 (excluding GST). The EIS does not include any details of additional equipment proposed as part of the development. Any alterations or additions for 'special equipment' should be clearly outlined in the EIS. Please describe and provide further details on what this additional item relates to in the context of the proposal.
- Apart from upgrades to several liquid waste storage tanks, the EIS does not include any additional internal works as part of the proposed development, however the QS report identifies minor internal and external services works. Please clarify and detail all building works and infrastructure upgrades or items requirement to facilitate the proposed development.
- The EIS states that 'no tree removal' would occur as part of the proposal. However, the plans for 16 Kiora Crescent show the removal of the existing demountable site office and laying of hardstand across the site across, an area currently grassed and containing at least one tree. Please clarify whether any vegetation removal is proposed as part of the EIS.
- Please provide the current operational hours of the facility.
- It is noted that the proposed development would generate an additional five personnel. Please provide details of work shift hours across the proposed 24/7 operations and clarify whether the total employee numbers also include truck drivers (noting that the Applicant currently operates a fleet of 7 vehicles).
- The site currently holds an EPA Environment Protection Licence (EPL) 20444. Please confirm whether the Applicant intends for the EPL to be amended to include the expansion of the proposal or if a new EPL will be sought.
- The site's existing operations is currently approved under Council DA 2013/351/1 consent. Please confirm if the Council DA consent will be surrendered should the proposed development be approved.
- Provide further details on the market demand for the proposed development type to justify the significant proposed throughput increase (from 900 to 110,000 tonnes) for a diverse range of liquid waste types.
- The EIS notes that the project would reduce waste generated by the community, however it is not clear how this will be achieved. Provide further details and justification on the resource recovery outcomes for the proposed development in line with the intentions of the *NSW Waste Avoidance and Resource Recovery Strategy 2014-21*.
- The mitigation measures presented in Chapter 12 of the EIS identifies mitigation measures, however this is not reflected in the Environmental Aspects and Impacts (EAI) Register (Appendix 9). Please confirm whether the Applicant proposes to prepare an updated and comprehensive EAI register. It is further noted that the details in the nature and extent of mitigation measures are considered by the Department to be minimal in the context of the significance of the throughput increases. Please update and provide further details.

2. Waste Management

- The site is currently authorized to process 900 tonnes per annum (tpa). An increase to 110,000 tpa is a significant increase. Further details are required to understand the ability of the site to accommodate the throughput, including:
    - unloading and loading times for vehicles to demonstrate that these activities can be adequately undertaken within the operational hours; and
    - the processing times for each waste stream and for all plant and equipment (including the shredder, processing equipment etc).

- Provide further details for the identification and handling of non-conforming waste.
- Table 15 in the EIS outlines the applicable resource recovery orders (RRO) and exemption (RRE) applicable to the proposed development. Please provide further clarification regarding which waste types will be processed by the proposed development, and which will trigger beneficial reuse values captured by the intent of these orders and exemptions. In addition, provide further details on the proposed testing regimes to ensure incoming/outgoing waste is appropriately classified / characterised to meet the definitions of the applicable RROs/RREs to minimise unacceptable environmental or human health risks to the surrounding and receival environments.
- It is noted that Intermediate Bulk Containers (IBCs) would be transported from 16 Kiora Crescent to the adjacent 14 Kiora Crescent for further processing. Please provide further details on the procedure in which the IBCs would be transported between the sites, including details on the proposed frequency and transit path for these movements and demonstrate how this would avoid interaction with incoming/outgoing heavy vehicles. Further details are also required on the mitigation measures to ensure the safe movement of IBCs and on-site vehicles is required.
- Describe the contingencies that would be implemented should machinery or pollution control equipment fail, as well as the maintenance and downtime requirements for unexpected stoppages during operational hours.
- The EIS notes that quantities of waste received at 16 Kiora Crescent are measured before and after receipt at a public weighbridge, typically 14 Sammut Street Smithfield. Provide further detail on how this is managed and recorded, particularly if the development will be accepting waste from vehicles outside its own fleet.
- Provide further details on the waste outputs and the final dispatch locations of solid and sludge waste produced, and details of the locations and licenced waste contractors that would be used to transport the waste off-site.
- Describe how product destruction waste (out of date liquid product/food waste) is transported to the site, and how the waste weight is determined.
- Provide further detail for storage limits and stockpile sizes/locations for process outgoing products should be provided. Please specify the location and volume of product storage at the facility, particularly with consideration of the increased processing output as part of the proposal.

3. Traffic and access

Site Access

- Previous advice provided by the Department and Council to the Applicant has outlined that the internal swept path movements are not appropriate and need to be updated to demonstrate that turning paths would not encroach onto Council footpath, nature strip or any other infrastructure located on Council land. It is noted that the advice has not been considered in the EIS, it is required that mitigation measures and/or alternatives need to be considered and subsequently updated to meet Council and the Department's requirements.
- The manoeuvring and turning of the vehicle must be completed within the site and must not cause encroachment into nature strip or the footpath. The swept path diagrams demonstrate otherwise with the encroachment into nature strip. As per previous correspondence the Department requested the proponent consult with Council to resolve internal swept path movements satisfactorily. Please provide further evidence of any further consultation with Council regarding the outcome and resolution of these issues.
- The site plan provided in Appendix 1 indicates that works would be carried out to widen the site entrance at 16 Kiora Crescent. Please provide further description of these works. The width of the proposed driveway shown in the site plan extends over two existing stormwater pits. Please advise if these stormwater pits would be required to be relocated or managed to allow the widening of the site entrance. The proposed driveway widening works should also form part of the proposed development description and the be reflected in the QS report.
- Update site plans to show the dimension of the site access upgrades proposed for the driveway entrance at 16 Kiora Crescent.

Traffic Generation

- The EIS notes that vehicle transporting waste to and from the sites can carry between 2,000 and 30,000 litres (L) of materials and notes that the majority of vehicles accessing the site are owned and operated by the Applicant, however the provided vehicle and truck register (Appendix 8) shows a list of existing truck fleet owned by the Applicant range in carrying capacity from 2,000 to 15,000L. Please clarify how the Applicant intends to transport 30,000 L of waste. It is also noted that vehicles carrying 30,000 L of waste is anticipated to be longer than the 10 metre vehicles assessed in the swept path analysis in the Traffic Impact Assessment (TIA).
- The vehicles shown in the register (Appendix 8) also appear to be liquid waste collection vehicles only. Numerous solid waste streams would be collected at the facility (clothes, containers with liquid etc). Please provide details of the truck types, size, capacity and frequency that would be transiting to the facility.
- Provide further details on how outgoing waste would be collected at the facility, including details of the truck types, size, capacity and frequency of outgoing product collection vehicles. These vehicles have not been accounted for within the trip generation numbers within the TIA and is required to be updated in the assessment.
- At present, only seven vehicles are recorded as owned by the Applicant (Appendix 8), and that most of the waste transported to the site would be via the Applicant's owned vehicles. Provide further justification and details on the feasibility of relying on existing vehicle fleet to meet demands across the Sydney metropolitan area, including further details on the proposed locations and destination of trips.
- Vehicle trips have been calculated with an even distribution across the 24/hr period. Some of the sources of incoming waste include retailers, outlets, supermarkets etc). Please provide details of the operational hours to demonstrate that an even split of vehicles across the 24-hour period is considered feasible.
- Vehicle trips have also been assumed in the TIA to be even across the entire annual (365 days) of operations. Based on the nature waste it is likely there would be peak periods or quieter periods (e.g. corresponding with Christmas periods etc.). A peak daily throughput should be identified and assessed as a worst-case scenario assessed.
- Provide details on the time require to load and unloading vehicles within the site to justify the site's ability to accommodate up to four truck movements per hour.
- The Proposal is considered a traffic generating development under *State Environmental Planning Policy (Infrastructure) 2007*. Please provide evidence of consultation with Transport for NSW during the preparation of the TIA.

Parking

- The EIS notes that truck parking would occur at 49-53 Pine Road. Please provide a copy of the development consent for use of this address as a truck depot.
- Please provide further details on the procedures in which vehicles would be 'called up' from the 49-53 Pine Road address to demonstrate how queuing would be avoided on Kiora Crescent.
- Provide a site plan for 49-53 Pine Road showing the site can suitably accommodate the Applicant's fleet.
- Describe and explain the process on how external vehicles not owned by the Applicant would access the site.
- Describe and explain the process for preventing queuing offsite for vehicles entering the site.

4. Air Quality

- The Air Quality Impact Assessment (AQIA) only assesses odour impacts with no other potential fugitive or point source emissions including hydrocarbons considered. Please update the AQIA or provide strong justification as to why no other potential pollutants are required to be assessed. The existing environment section of the EIS notes high background levels of PM2.5 and PM10. Given the presence

of a shredder on site and the increase in vehicle movements and intensification of operation of the site the AQIA should be updated to include an assessment of other potential pollutants (including VOCs, PM10 and PM2.5)
- Provide further detail of the proposed odour monitoring measures to be used and how air quality impacts would be monitored and managed during operations
- Provide further details on the processing capacity and processing/flow rates for odour management infrastructure (i.e. solids filter, dissolved air flotation (DAF) equipment etc). It is noted that the maximum flow rate through the bio trickling filter system is not expected to increase. Please specify what the maximum flow rate is to justify that the system can suitably accommodate the significant throughput increase.

5. Noise and Vibration

- Assess and provide further information on the cumulative noise impacts of other surrounding development in the Noise Impact Assessment (NIA).
- Provide further details and justification for the proposed noise management and monitoring measures for the proposed development.

6. Water Management

- The updated plans show the removal of the grassed area in the north-western corner of 14 Kiora Crescent and replacement of this area with hardstand. An increase in impervious area will increase the stormwater flows across the site. Please quantify the additional stormwater flow and assess the potential water quality impacts and ability for the stormwater infrastructure to accommodate these changes.
- The EIS has not included mitigation measures that would be implemented during an overflow event with pits/sumps or in the event of a fire incident where fire containment.
- The increased processing requirements as part of the proposal would likely contribute to a significant increase in the volume of wastewater discharged to sewer. Provide additional detail on the associated infrastructure (sewer connection) capacity to facilitate this increase, including maximum flow rates and capacity for discharge to the sewer system.

7. Contamination

- It is noted that while no major intrusive works are proposed, vegetation removal, resurfacing (e.g. once the demountable is removed) and widening of the site access are likely to result in some exposure of soils. Given the history and nature of the site an assessment of the potential to expose contaminated soil (as required by the SEARS) should be provided and mitigation measures identified in the even construction works result in the exposure of contaminated soils identified.
- It is noted that there is limited capacity for detention of fire water onsite and that it would pool in the Kiora Crescent cul-de-sac where it could be pumped up by the Applicant's vehicle fleet. Please assess the potential contamination risks associated with such an event.

8. Greenhouse Gas

- Provide the feasible measures that would be implemented on site to minimise the proposal's greenhouse gas emissions.