

## ATTACHMENT 1 – Department’s Response to Submission review comments

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

### 1. General Requirements

- The site is currently approved by the Council to process 900 tonnes per annum (tpa) of liquid waste materials, with the Applicant proposing to increase the throughput to 110,000 tpa as part of the SSD proposal. Further justification is required to demonstrate that the existing and proposed infrastructures (i.e. increase in tank size of Tanks 5, 6 and 8) and site suitability would be sufficient to cater for the proposed increase in waste processing throughput, storage and vehicle movements.
- Provide further details on the market demand to support the proposed throughput increase for a diverse range of liquid waste types should be provided. It is noted that the RtS references the Australia Government waste export ban as a driver for the need for the proposal, however it is understood that this direction targets solid waste streams such as glass, plastics and cardboard, and not liquid waste. The Applicant’s justification for the proposal should include further quantification of supply and demand factors supported by relevant references to market data with regards to the waste types targeted.
- The RtS introduces the inclusion of a new area located at 27-49 Nelson Road, Yennora for the development’s truck parking which was previously not reported in the EIS. Additional information is required as follows:
  - Confirmation of where maintenance of its waste transport vehicles associated with the proposal will be undertaken, and whether that location has lawful approval and environmental controls in place to service waste transport vehicles.
  - A site plan to show that the new proposed parking address at 27-49 Nelson Road can suitably accommodate the Applicant’s entire truck fleet.
  - A copy of the development consent or agreement for use of the above address as a truck depot.

### 2. Traffic and Access

- The RtS has reported that other small industrial sites in the area cannot meet requirements for trucks to enter and leave in a forward direction is not considered adequate to address the truck manoeuvring concerns previously raised by Cumberland City Council (Council) and the Department for the proposal. The Department and Council have previously stated they will not support the proposed reverse manoeuvring of vehicles accessing the site as it will compromise the safety for pedestrians and vehicles within the vicinity. Please provide alternative measures to adequately address Council’s requirements with vehicles entering leaving the site in a forward direction.
- The vehicle and trucks registration provided in Attachment 8 of the revised EIS lists a site vehicle which is 11.5 metres (m) in length, however swept paths provided have only been provided for 10 m trucks. For consideration of potential future delivery vehicles and to be consistent with Australian Standards, swept paths should be provided for 12.5 m trucks. Please update.
- The Department has previously requested for the Applicant to further consult with Council to resolve truck manoeuvrability issues at the site. The RtS does not provide sufficient evidence to indicate that internal swept path movements have been satisfactorily resolved with Council. Trucks are still required to be undertake a four-point turn and reverse into Council land which has been identified as being unsatisfactory by Council, whereby manoeuvring should be limited to a 3-point turn into the site. Please address.
- Council have further identified safety risk concerns associated with reverse manoeuvring on Council’s land. Vehicles are required to enter and leave the site in a forward direction. The Applicant has not resolved this issue.
- Update the swept path drawing to clearly demonstrate vehicle movements entering and leaving both 14 and 16 Kiara Crescent.

- Council have identified that they would not support the proposed driveway widening and that the use of the driveway should be for access only, and not for manoeuvring. It is further noted that the proposed widening of the driveway at 16 Kiara Crescent to allow for greater room for vehicle turning also contradicts with Council's request for all vehicles to manoeuvre within the site itself. Please address.
- No mitigation measures have been identified for traffic and transport for the proposal. Mitigation measures should be provided outlining how the Applicant would ensure internal and external traffic movements are safely managed to reduce impacts on the surrounding road network as well as appropriately mitigate on site operational safety risks.
- The RtS has indicated that a Construction Pedestrian and Traffic Plan is not considered warranted as required by TfNSW for the proposal, however does not provide a construction traffic impact assessment to support this statement. Please address.

### 3. Air Quality

- It is noted that the revised Air Quality Impact Assessment (AQIA) provides an updated assessment of Volatile Organic Compounds (VOCs). This assessment includes tabulated xylene, however tabulated data is not provided for benzene despite the maximum modelled ground level concentration of benzene reported (0.028 mg/m<sup>3</sup>) is close to the limit (0.029 mg/m<sup>3</sup>). Please provide this information.
- The Applicant has not provided details of an odour assessment for 16 Kiara Crescent, including details of a worse-case scenario. The RtS reports that due to limited available odour emission data from existing/similar liquid waste facilities, it is an indication that there are low odour risks for the site. The Department does not consider this response as sufficient justification to warrant the exclusion of an odour assessment for 16 Kiara Crescent. Please update the OIA to include odour impacts from 16 Kiara Crescent.
- Update the OIA to include the following information:
  - comparison between existing (current) worst case odour modelling and future worst-case odour modelling;
  - the current average and maximum throughput (daily/hourly) and the potential maximum throughput (daily/hourly) for each part of the plant(s);
  - details about what waste streams were assumed in the worst-case impact assessment;
  - examples of similar sites processing similar liquid food waste to demonstrate that these products are not indeed odorous as claimed;
  - the location of the emission of each odour source as well as its characteristics and likely emission frequency, timing, duration, intensity, characteristics and chemical composition (as required by the *Technical framework - Assessment and Management of Odour from Stationary Sources in NSW*); and
  - details of odour mitigation measures including monitoring as in accordance with the Approved Methods.

### 4. Waste

- Provide further details and confirmation on whether waste deliveries would cease during periods of downtime or maintenance. Details should be provided regarding alternate locations should onsite storage not be sufficient.
- The information provided in the RtS, including the waste stream processing capacity (Table 2-1) and water processing equipment capacity (Table 2-2) are unclear regarding the ability for the site to accommodate the proposed throughput (110,000 tpa). Please provide further clarification with regards to the requested information:
  - unloading/loading times for vehicles to demonstrate that these activities can be adequately undertaken within the operational hours;
  - the processing times for each waste stream and for all plant and equipment; and
  - clearer details on what is meant by the '% of the year' within Table 2-1 and Table 2-2 of the RtS.
- Provide further details on the waste outputs and the final dispatch locations for waste materials processed at 16 Kiara Crescent.

- The RtS refers to the use of an off-site weighbridge located at 14 Sammut Street, Smithfield for incoming loads as there will be no weighbridge located on either 14 or 16 Kiora Crescent. In accordance with the *Protection of the Environment Operations (Waste) Regulation 2014*, all waste vehicles entering and leaving the facility are required to be weighed on a weighbridge. Waste records must be provided during use of the weighbridge and to include specific waste records detailing the amount of waste (in tonnes), the type of waste, the delivery vehicle registration number, the date of waste delivery and location of where the waste is to be placed. Waste records are also necessary to comply with EPA Environment Protection Licence (EPL) conditional requirements. Please provide further details on how waste records will be obtained for both incoming and outgoing waste vehicles from 14 and 16 Kiora Crescent.

## **5. Noise and Vibration**

- The cumulative noise assessment presented does not adequately include an assessment of other approved and proposed developments surrounding the proposal. The capped maximum LAeq levels for any one development outlined in the Noise Policy for Industry is not considered to be adequate justification for the conclusion that the proposal would have no cumulative noise impacts.
- An inventory of noise sources for activities at the development which carefully differentiates steady, non-steady, and incidental sounds must be provided.
- Please provide additional justification to support the selection of noise monitoring 'Location A' and elaborate on whether noise monitoring at this location is representative of the most-affected location(s). Noise contours should be presented within the NIA to ensure noise levels in the surrounding areas can be comprehensively assessed.

## **6. Contamination**

- Given the low firewater detention available onsite, the contamination risk assessment related to the firewater in the RtS understates the likelihood and consequence of contaminated firefighting water entering the stormwater system in the event of a fire and failing to be intercepted before entering the nearest water infrastructure. On-site firewater containment should be provided.

## **7. Stormwater Management**

- Council's request for a detailed stormwater drawing (layout plans, cross-sectional details, and connection details of the outlet pipe to the street system) have not been provided. Please provide this information.
- The updated EIS has not included mitigation measures that would be implemented to prevent liquid entering Council's stormwater during an overflow event with pits/sumps or in the event of a fire incident where fire containment is not possible. Please provide this information.

## **8. Consultation**

- The revised and proposed driveway design for 16 Kiora Crescent appears to impact a Telstra pit, evidence of consultation with Telstra should be provided.
- A community and stakeholder participation strategy was required as part of the SEARs, however has not been prepared and included as part of the RtS or updated EIS. Further consultation should be undertaken with adjoining landowners and the wider community, or justification for the extent and nature of consultation carried out should be provided.
- No details regarding the proposed approach to future community and stakeholder engagement have been provided.