

Eastern Creek REP Throughput Increase (SSD 11606719)

Department's comments on Environmental Impact Statement

25 August 2022

In order to finalise the Department's assessment, additional information is required:

1. General

- Further clarification should be provided about the Applicant's intentions regarding the existing consent 06_0139 (as modified) should the Proposal be approved. Please note that, as the operations and infrastructure approved (or currently under assessment) under the MP 06_0139 consent are closely related to the Proposal, the Department would recommend the MP 06_0139 consent and associated modifications be consolidated into the one instrument for the site.
- The EIS does not appear to have taken into consideration or provided adequate details on the following proposed modification assessments:
 - MOD 9 (Upgrades to the western operational area)
 - MOD 10 (Landfill gas capture and treatment project)
 - MOD 11 (Timber Picking Station)
 - MOD 12 (Relocation of gas flare compound)

The infrastructures and site layout upgrades proposed in these modifications should be considered and assessed with regard to their cumulative impacts and interaction with the Proposal.

- Please provide further detailed justification for the size of the additional waste throughput. This information should consider the existing capacity of Bingo Industries' Greater Sydney network of waste / resource recovery facilities to process construction and demolition (C&D) and construction and industrial (C&I) wastes. This information should also provide details of the anticipated source locations of incoming waste materials.
- Section 7.5 and Figure 7-1 of the EIS provide details on the proposed timeframes and staging of the Proposal, i.e. Stages 1 to 3. However, some of the details on timing of stages are unclear and there appears to be some overlap of activities between Stages 2 and 3. Please provide further clarification on the timeframes and staging of the Proposal, specifically regarding the timing of various operational and construction activities, as well as details of contingencies should activities proposed in the various stages be delayed.

2. Waste Management

- The proposal includes landfilling additional material into the void. Please clarify how much material will be landfilled per annum, including worst-case volumes. Please clarify if the landfill void will fill more quickly and, once the void is filled, where proposed residuals would be landfilled in the future.
- Further, provide details of whether the original long-term plans to rehabilitate the landfill void or the final landform will be altered from MP 06_0139 Schedule 4 Condition 1.

- The EIS states the Material Processing Centre 2 (MPC2) has the ability to process waste materials received at the facility to achieve resource recovery rates of up to 90%. Please provide details to demonstrate how a 90% recovery rate would be achieved.
- Please provide a breakdown of approximate total daily, weekly and monthly quantities of various waste streams to be received and processed on site.
- Please provide site plans detailing the locations of the following: 1) where incoming waste types will be stored and stockpiled when received at the facility, and 2) where various recovered material types will be separated and stored on site before being dispatched off-site.

3. Air Quality and Odour

- The EPA appears to have raised a range of issues on the Air Quality Impact Assessment (AQIA) which need to be addressed.
- The AQIA indicates that the approved MP 06_0139, MOD 10 landfill gas capture treatment system will provide significant improvements to the efficacy of landfill gas capture and will effectively manage odours from the landfill at the site. Please provide further details and specifications (including processing and flow treatment rates) to demonstrate and justify that the gas capture treatment system can manage odour impacts associated with the proposed additional residual wastes as well as the existing waste.
- Describe any contingencies or additional measures that would be implemented to manage odour should the landfill gas capture treatment system be off-line or out of order for a period of time.
- Figure 2-1 in the AQIA provides the assessment locations for commercial and residential receptors. It is noted that the Minchinbury residential assessment locations north of the site are on the periphery of the suburb on the far side of the M4 Motorway from the facility. Please justify whether the AQIA adequately assesses and captures all potentially affected receiver locations.
- It is noted in the AQIA that odour emissions monitoring was undertaken in June 2022 to inform the odour emissions inventory developed in the EIS. Please provide further details on the June 2022 odour monitoring assessment including assessment locations, date of monitoring, meteorological data, dispersion modelling and results.
- Please provide further information on the facility's odour complaints management system, including details of how complaints are recorded, investigated, followed-up and resolved.
- The AQIA states that construction activities associated with Stages 2 and 3 have a low potential for dust emissions. Please provide further justification to support this assumption.
- The AQIA appears not to have considered air quality impacts associated with road dust from vehicles entering and leaving the site for construction works and/or operations. Please update the EIS to consider traffic air quality emissions for the site.

4. Traffic

- Tables 6.2 and 6.3 in the TIA indicate that hourly vehicle traffic generation for Stages 1 and 2 is based on '24-hour operation per day (assumes vehicles are evenly split across the day)'. Please confirm if this assumption has been used for the purposes of calculating total traffic generation only, rather than for peak hour traffic modelling.
- Please clarify how the data in Table 6.4 (Cumulative Impacts) in the TIA has been factored into the SIDRA modelling in Table 6.9 and Appendix, including a breakdown of peak hour increases in traffic and staff shift changes.
- The TIA does not appear to have considered the total cumulative traffic from the existing operations at the site with Stages 1, 2 and 3 of the Proposal. Please update the TIA with this information.

- Clarify how traffic generation from existing and any approved industrial sites near the site and all developable industrial zoned land in the vicinity of the site has been considered in the cumulative impact analysis.

5. Noise

- The assessment locations provided in the Noise and Vibration Impact Assessment (NVIA) in Figure 2-1 appear to be located on the southern Minchinbury residential boundary closest to the site and near the M4 Motorway. The Department notes the EPA's Noise Policy for Industry (NPfI) requires an assessment to be undertaken at the most-affected locations, rather than simply the closest ones. A most-affected location is a sensitive receiver location that experiences (or will experience) the greatest noise impact from the noise source under consideration. Please provide justification and demonstrate that the NVIA has considered all representative receiver locations which are most affected by the Proposal.
- Section 3.4 of the NVIA provides details and results of noise monitoring undertaken in October 2020. Please provide a site plan showing the noise assessment locations detailed in Table 3-5.
- Please provide further details on how cumulative noise impacts (including those from surrounding developments) have been addressed.

6. Water Management

- Please provide a detailed site plan outlining all existing water management infrastructures at the site. Consideration should also be given to the stormwater basin upgrades proposed in MOD 9 under the MP 06_0139 consent.
- It is noted a leachate treatment plant is currently located on the site for the capture of dirty water from processing operations. Please update the site plans to show the location of the internal leachate collection system. Furthermore, please provide details on the following:
 - the process by which dirty water/leachate will be collected
 - the capacity of the leachate tanks
 - the amount of leachate generated from operational activities
 - the frequency with which leachate will be pumped out and removed from the tanks and discharged to sewer (Trade Waste).
- Provide further clarification on the management of wheel wash water, including details of where the wheel wash water will be stored, treated and/or discharged or reused.
- Table 13-5 in the EIS outlines the mitigation measures for hazards and risks and states that fire water will be contained where possible. Further details are required on the management and containment of retained fire water after a fire event.
- Please provide mitigation measures to be implemented during an overflow event with pits and sumps on the site.
- Provide details on the sediment and erosion controls and measures to be implemented through the various stages of construction works proposed for the development.

7. Consultation

- Further clarification is required on the outcomes of consultation with key authorities including Blacktown City Council and EPA. The Engagement report appears to only identify issues that were raised by these agencies on 17 November 2021, with no further details provided on whether the issues raised have been resolved or considered.

- Please clarify whether further consultation has occurred since the finalisation of the Engagement report.