# Department's comments

## General

- The EIS states that the Applicant seeks approval for the production of 4000 tonnes per year of chemical products. The EIS also suggests the development would require a licence from the EPA (exceeding 5,000 tonnes per year) given the proposal would produce 180,000,000 litres of soap and detergent products per year. This amount would equate to around 181,976 tonnes of liquid soap (depending on the exact weight of product).
    - Respond to this contradiction and provide a clear indication of the exact amount in tonnes proposed to be produced per year.
    - It is noted that some of the technical studies have been prepared based on a maximum throughput or production capacity of 4000 tonnes per year. Should an increase quantity be proposed, these studies would need to be updated.
- Provide details of how the liquid truck filling station will operate.
    - Also provide an indication of the height of the conveyors and given their location at the frontage of the lot, assess any potential visual impacts caused by the structures.
- Justify the external loading and unloading of DG's given the availability of several loading bays for internal loading and unloading.
- Provide more details on the Applicant's Smithfield operations which has been used as a reference facility in the EIS, including:
    - Amount of liquid soap and detergents produced per year, noting the EIS suggests the total throughput of the Smithfield site including liquid and solid soap is around 4000 tonnes per year.
    - Maximum production amounts per day in tonnes.
    - Number of employees.
    - Additional background information on Jalco including types of products produced and application, main customers and locations of primary on-sellers of the product.
    - A breakdown of vehicle movements including heavy vehicles.
- The Process Flow Diagram at Appendix S contradicts the information in the EIS relating to production capacity and employee numbers:

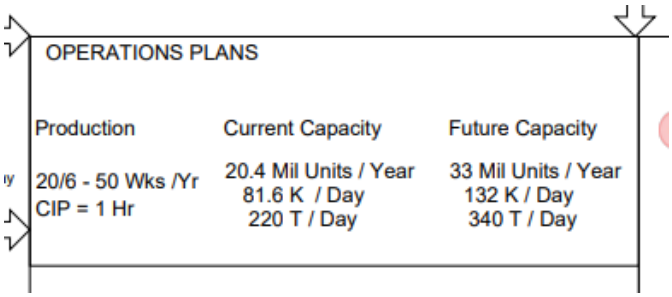
- The EIS suggests the site would have 60 staff and have a production rate of 4000 tonnes per year. Please clarify this contradiction.

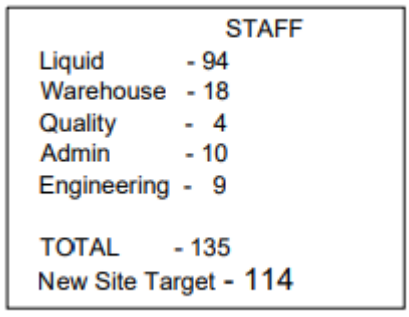
## Traffic

- The Transport Assessment suggests the swept paths and manoeuvring of vehicles on site has been approved as part of MOD 1 of SSD 10436. However, MOD 1 did not propose the unloading of DG's externally via forklift.
    - Provide the location of the DG loading and unloading area in consideration of the swept path requirements of other trucks including those parked at the liquid filling station and trucks in the loading docks.
- The Transport Assessment suggests that operational traffic data was provided to the author of the assessment by ESR based on the Smithfield operations. How were these traffic counts taken? Are the Smithfield operations precisely representative of the proposal to assume the vehicle movements would be the same? Are the traffic numbers based on the Smithfield site operating at full capacity to the same level of throughput and output as the proposal? Are all the vehicle numbers from liquid soap manufacturing?
- Provide a breakdown of the types and quantities of trucks that deliver materials, chemicals and dangerous goods to the site.
    - How often is the liquid filling station utilised to necessitate three filling points? How long does it take to pump out the liquids in the tanker?

## Air

- The AQIA was based on a production capacity of 4000 tonnes per year and a total of 30 heavy vehicle movements per day. This contradicts the Traffic Assessment and the EIS. Please clarify and have the AQIA updated if required.
- The EIS states that the odour emission monitoring of the Smithfield site was utilised to create the model in the AQIA as it has a comparable production capacity of 4000 tonnes per year. Should the Applicant be seeking a throughput in excess of 4000 tonnes per year, the AQIA must be updated to assess the resultant impacts of the increased throughput.



## Noise

- As noted above, the maximum production capacity of the facility is unclear in the EIS. It appears the technical studies have been based on a production capacity of 4000 tonnes per year. In the Noise Impact Assessment (NIA) for SSD 10436 for ESR Logistics Park heavy vehicle movements were restricted on Lot 201 to **10 two-way** movements over a 15-minute period to ensure cumulative operations of all tenancies met the noise limits. The NIA submitted with the EIS for this SSD has utilised the operational truck movements from the Smithfield site (see above requesting additional information on how these numbers were calculated) and suggested a maximum of seven trucks would be expected in a 15 minute period during the night. Should the operating capacity be increased to produce in excess of the existing Smithfield facility, updates to the NIA would be required.

## Water

- Provide a detailed description and specifications for the wastewater treatment plant (WTP) including maximum daily and weekly wastewater flow rates and a justification that the system can cater for these flows.
    - Provide a site-specific contaminated water retention plan or similar to justify the sizing and type of the proposed WTP, conveyance systems and bunding – including a water balance.
    - Provide a quantification of contaminated water in the case of a fire and how the proposed building, bunding and internal and external water conveyance systems can cater for the expected volumes.
    - A flow diagram of the wastewater treatment train including yearly quantities of wastewater should be provided.
    - Provide contingency measures should the WTP be out of commission.
- DG's will be unloaded externally via forklifts. The EIS suggests that: "*No further changes are proposed to the approved building or stormwater management works than those previously approved."* Based on a review of the Contaminated Water Retention Plan for the Smithfield site at Appendix P of the EIS, this would not be the case as water from any areas which store or unload DG's would need to be directed to the WTP. SSD 10436 required a Stormwater Management Plan to be prepared prior to the construction of the warehouse. The Civil Plans for MOD 1 detail that all external stormwater captured on the roof and hardstand areas, including the external areas to be used for the unloading of DG's, would be directed to an underground OSD tank prior to discharge to the street. Provide details of how the approved stormwater management system on site would need to be augmented or re-designed to facilitate the development and the conveyance of contaminated or potentially contaminated water to the WTP.
    - Provide Civil Plans similar to those submitted with MOD 1 of the amended stormwater system.
    - Provide a justification for the type of storm event the system would be designed to?