# Secretary's Environmental Assessment Requirements (SEARs): Scoping Report

## A Submission to the Department of Planning, Industry and Environment NSW

## On behalf of Kiora One Pty Ltd

**13th April 2022**

MRA Consulting Group

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Job No. 221-5417-02

### Prepared by

MRA Consulting Group (MRA)
Registered as Mike Ritchie & Associates Pty Ltd
ABN 13 143 273 812

Suite 408 Henry Lawson Building
19 Roseby Street
Drummoyne NSW 2047

+61 2 8541 6169
info@mraconsulting.com.au
mraconsulting.com.au

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### Disclaimer

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# Glossary

| Terminology | Definition |
|---|---|
| AHIMS | Aboriginal Heritage Information Management System |
| C&D | Construction and Demolition |
| DCP | Development Control Plan |
| DPIE | Department of Planning, Industry and Environment (NSW) |
| EIS | Environmental Impact Statement |
| EP&A Act | Environmental Planning and Assessment Act 1979 |
| EPA | Environment Protection Authority (NSW) |
| EPL | Environment Protection License |
| FTE | Full Time Equivalent |
| IBC | Intermediate Bulk Container |
| LEP | Local Environmental Plan |
| LGA | Local Government Area |
| MRA | MRA Consulting Group |
| OEMP | Operational Environmental Management Plan |
| PFAS | Per- and poly-fluoroalkyl substances |
| PFOS | Perfluorooctane sulfonate |
| PFOA | Perfluorooctanoic acid |
| PoEO Act | Protection of the Environment Operations Act 1997 |
| SEARs | Secretary's Environmental Assessment Requirements |
| SEPP | State Environmental Planning Policies |
| SSD | State Significant Development |
| tpa | tonnes per annum |
| VOCs | Volatile Organic Compounds |
| WARR | Waste Avoidance and Resource Recovery |

# Executive Summary

**Introduction**

MRA Consulting Group (MRA) have prepared this project scoping report on behalf of Kiora One Pty Ltd (Kiora One) for submission to the NSW Department of Planning, Industry and Environment (DPIE). Kiora One have recently acquired a site at 5 Kiora Crescent, Yennora in Sydney's west. The site was vacant and being used as overflow car park and shipping container storage yards until September 2021. Construction is now underway for three large industrial buildings and ancillary offices (approved under DA no. DA2019/457/1 issued by Cumberland City Council on 31 May 2020. Kiora One propose to commission these buildings as facilities for liquid waste processing, depackaging/product destruction, non-destructive drilling mud dewatering and transfer of hazardous waste/ dangerous goods. The facility would accept and process up to 270,000 tonnes of material waste per year across all proposed uses.

**Background**

Kiora One is a sister company to Enviro Waste Services Group, an Australian family owned and operated, 24-hour Liquid Waste disposal company in Sydney who specialise in the removal and treatment of liquid waste.

The group currently operates a facility for the processing and treatment of liquid waste on the opposite side of Kiora Crescent from the proposed development (site identified as 14-16 Kiora Crescent, Yennora). Both existing and proposed facilities would complement each other, with the proposal to manage a range of similar and different types of liquid waste compared to the existing facility.

**The Proposal**

It is proposed to develop waste facilities at the site capable of handling up to 270,000 tonnes per annum (tpa) of waste in total, comprising of approximately:

- 180,000 tpa of liquid waste (including waste cooking oil, sewage sludge and residues, industrial waste residues);
- 60,000 tpa of drilling muds;
- 20,000 tpa of product destruction; and
- 10,000 tpa hazardous liquid waste.

The above materials would be managed through separate processes proposed to be commissioned at the site, utilising the various industrial infrastructure already approved and under construction at the site. The facility would also require to be licenced to receive proposed wastes to include the following:

- Residues from industrial waste treatment/disposal operations – landfill leachates (N205);
- Liquid waste material in glass, plastic or aluminium containers;
- Surface active agents (surfactants), containing principally organic constituents and which may contain metals and inorganic materials (M250);
- Per- and poly-fluoroalkyl substances (PFAS) contaminated materials, including waste PFAS containing products and contaminated containers and PFAS (including PFOS and/or PFOA) contaminated fire-fighting foams (M270);
- Waste oil/ waste, hydrocarbons/ water or emulsions (J120);
- Waste mineral oils unfit for their original intended use (J100);
- Fire debris and fire wash waters (N140); and
- Sewage sludge and residues (K130).

The main objective of the proposal is to increase the liquid waste management capacity of the company's business of liquid waste processing, treatment and recovery. The proposed facility would also:

- Create a new facility to efficiently process liquid waste, reducing likelihood of illegal dumping; and
- Enable to operate to a high environmental standard and ensure cleaner production principles are implemented.

**Statutory Context**

The scale of proposed processing of liquid waste (>10,000tpa liquid food and >1,000tpa other aqueous or non-aqueous liquid industrial waste), processing C&D waste (>100,000tpa), processing dangerous goods (>1,000tpa) will trigger State Significant Development under the *State Environmental Planning Policy (Planning Systems) 2021*. Accordingly, the Department of Planning, Industry, and Environment (DPIE) will be the consent authority for the development application.

The development will also require a licence under the Protection of the Environment Operations Act (PoEO Act).

The site is located in land zoned IN1 – General Industrial under the Cumberland Local Environmental Plan (LEP) 2021. Resource Recovery is permitted with consent in this zone type. Additionally, under the *State Environmental Planning Policy (SEPP) (Transport and Infrastructure) 2021*, waste management facilities are permitted with consent in prescribed zones (IN1 – General Industrial is classified as a prescribed zone).

The project's compliance with the Cumberland LEP and the Cumberland Development Control Plan (DCP) 2021 will be included in the Environmental Impact Statement.

**Strategic Context**

This project supports the NSW Waste and Resource Recovery (WARR) targets for resource recovery by:

- offering a liquid waste recycling service, thus contributing to reduce waste disposal per capita;
- creating additional capacity for commercial and industrial liquid waste recycling operations and establishing additional liquid waste recycling options, thereby supporting an increase in the recycling rates for these wastes;
- ensuring packaging from waste products is diverted from landfill and recycled, for product destruction for instance;
- increasing the processing and treatment capacity for non-destructive drilling (NDD) waste and allowing for better management and recycling potential of this type of waste;
- providing competitive, cost effective liquid waste facility thus reducing incentive for illegal dumping; and
- increasing the effective transfer capacity for hazardous materials from within the Sydney Basin, considering processing and treatment options are typically situated elsewhere.

**Options Analysis**

Several alternative options were considered when developing the project proposal:

<u>Option 1: Receive and process 270,000 tpa of waste at the site at 5 Kiora Crescent, Yennora</u>

This option involves developing the site at 5 Kiora Crescent into a liquid waste processing, non-destructive digging mud (NDD mud) processing, product destruction and hazardous materials transfer facility capable of receiving and processing up to 270,000 tpa of waste. The site is suitable for such a use, both in terms of site infrastructure (with minimal additional work required) as well as from a planning perspective (resource recovery, waste storage and transfer permitted with consent in the IN1 General Industrial zone).

The site is situated in an industrial area close to major arterial roads that will connect the site to the rest of metropolitan Sydney without causing undue disturbance to residents. Residents and other sensitive receivers are located a substantial distance from the site and there are therefore no expected impacts to residential amenity.

Industrial buildings currently under development at the site according to existing approvals have been designed to accommodate a range of uses according to this proposal.

Option 2: Increase capacity at the proponent's existing site at 14-16 Kiora Crescent

Enviro Waste currently operates a facility for the processing and treatment of liquid waste on the opposite side of Kiora Crescent from the proposed development (land at 14-16 Kiora Crescent, Yennora). This site has recently been approved for the expansion of operations and is unlikely to be able to accommodate further increases in future. In addition, the existing operation does not have space to accommodate both existing and proposed processes for different types of waste, complementing rather than duplicating each other.

Option 3: Develop an alternative site for the proposed use

Kiora One have carried out a preliminary study looking at alternative sites, to assess their suitability and any potential environmental and planning constraints associated with developing these. The subject site was deemed the preferred option for functional and environmental purposes.

Option 4: 'Do Nothing' Option

The consequences of not proceeding with the project would be to deny the wider community of the benefits resulting from the increased capacity of liquid waste treatment and recycling. If the 'do nothing' option was implemented, the demand on liquid waste treatment and recycling would only increase, thus resulting in a potential increase of the cost of this service across NSW, incentivising illegal dumping of liquid waste.

The 'do nothing' option also does not align with the direction of Kiora One as a business and is likely to limit the ability to manage waste streams proposed due to limited regional alternatives.

Preferred Option

Option 1 is preferred due to the need for increasing capacity for resource recovery, and particularly the management and treatment of liquid waste, in the Sydney metropolitan region. The suitability of the site and its geographic location in relation to its proximity to sensitive receptors, feedstock generation, accessibility and offtake partners were all taken into consideration as part of the site selection process.

**Potential Environmental Impacts**

The operation of the proposed waste processing facility may see impacts realised by neighbouring properties in the following aspects:

- no major excavation works are anticipated during the developmental works of the project, during which no impacts on groundwater are foreseen. The site is not classed on an area of acid sulfate soils and no soil contamination issues are likely to occur.
- The site has been largely already developed for the use as an industrial site. The proposal would address specific needs related to the proposed uses, however it is unlikely that there will be a need for extensive construction works outside of the installation of plant and equipment, including the storage tanks or bunding to contain spills from the processes. The EIS will include design of surface water controls to prevent uncontrolled release of water from the site.
- The site falls under a medium to low flood impact risk according to Cumberland Council flood mapping. The potential impacts of flooding have previously been assessed and considered in the design of the industrial buildings at the site. Flood risks will be reviewed as part of the EIS process and assessed in terms of potential impact on the proposed uses (with consideration to measures in place to mitigate flood risk from existing approved development features).
- The site will store small quantities of hazardous substances and chemicals and will comply with the requirements of the Work, Health and Safety Regulation 2017.
- Access to the site is provided from Kiora Crescent. The site is expected to receive up to 150 trucks per day for delivery and offtake of waste materials. This averages to approximately 12 truck movements per hour or one truck every 5 minutes over a 12-hour period (it is expected that the site may receive some deliveries overnight from potential emergency or night works, however the bulk of deliveries and offtake will occur between approximately 6am to 6pm). The site will accommodate trucks entering and exiting in a forward-facing direction with minimal traffic conflicts

via separate entry and exit points off Kiora Crescent. Parking for staff and visitors will be provided onsite according to the existing approved site plan (see Appendix A).

- Operational noise is anticipated from truck movements, loading/unloading of waste and the operation of processing equipment within the building. The development is surrounded by industrial land for at least 300m and it is not considered that noise will affect the amenity of the closest sensitive receptors or industrial premises. A noise impact assessment would be included in the EIS.
- Impacts to air from the development are primarily related to odour emissions. A range of mitigation measures, to include biotrickling filter system, vertical dispersion stack, indoor operations and the use of deodoriser would be able to mitigate potential odour impact.
- There are minimal anticipated environmental impacts associated with heritage, bushfire, biodiversity, and visual amenity due to the industrial location and pre-developed nature of the site.
- The site will be managed in accordance with an Operational Environmental Management Plan (OEMP), which is a compilation of plans and policies that ensure the safe and efficient operation of the site, to be prepared prior to commencement of operations at the site.

**Conclusion**

The demand for liquid waste recycling around Sydney metropolitan region and the wider NSW has been increasing. The site would provide much needed capacity to increase process quantities of liquid waste, thus reduce the likelihood of illegal dumping.

The subject site has been chosen for the proposed development due to its location within an established industrial area, with adequate separation distance from residential areas and ecologically sensitive receivers. The proposed development will have extensive environmental safeguards to provide assurance with regard to the expected degree of environmental impacts.

The project will provide employment opportunities by creating 33 ongoing operational jobs.

The project is justified socially (by new job creation), environmentally (by ongoing and sustainable management of liquid waste), and economically (by supporting the liquid waste recycling and recovery market). It aligns with current and future land use for the surrounding area and with the resource recovery aims and objectives of the *NSW Waste and Sustainable Materials Strategy*.

# 1 Introduction

This project scoping report, submitted to support a request for Secretary's Environmental Assessment Requirements (SEARs Request) has been prepared by MRA Consulting Group (MRA) on behalf of Kiora One .

Kiora One intends to develop the site at 5 Kiora Crescent, liquid waste processing, depackaging/product destruction, non-destructive drilling mud dewatering and transfer of hazardous waste/ dangerous goods. The site is situated within the Cumberland Council Local Government Area (LGA).

The proposed facility will have a processing capacity of up to 270,000 tonnes per annum (tpa) across the various uses described and would operate 24 hours a day (2 x 10-12 hour shifts), 7 days a week.

This report aims to provide a formal introduction to the proposed development and will:

- Outline the proposed works and operations;
- Provide a description of the site, surrounding area, and environmental context;
- Assess different options and alternatives to the proposal;
- Provide a high-level summary of the planning framework and strategic context of the proposed development;
- Outline the strategic need of the proposal;
- Identify current and future community consultation and stakeholder engagement activities undertaken for the proposal;
- Provide a preliminary environmental assessment for the proposal; and
- Provide the justification and need of the proposal.

The proposal is State Significant Development (SSD) under Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* as a facility which exceeds the following thresholds (Schedule 1 Clause 23 Waste and resource management facilities):

- Liquid Waste:
  a) handles more than 10,000 tonnes per year of liquid food or grease trap waste, or
  b) handles more than 1,000 tonnes per year of other aqueous or non-aqueous liquid industrial waste.
- Solid waste:
  – handles more than 100,000 tonnes per year of waste.
- hazardous waste:
  – handles more than 1,000 tonnes per year of liquid waste classified in the Australian Dangerous Goods Code or medical, cytotoxic or quarantine waste.

The proposed development would generate 33 FTE positions during operation.

# 2 Background

## 2.1 The Applicant

Kiora One is a sister company to Enviro Waste Services Group, an Australian family owned and operated 24 hour Liquid Waste disposal company in Sydney who specialise in liquid waste removal.

The group was founded on the extensive experience of its Owner and Director, Eddy Hawach who has been in the Liquid Waste industry in Sydney for over 15 years. The company was built on ensuring the highest quality of care is taken to ensure customer satisfaction without impacting on the built and natural environment.

The group specialises in the following:

- Liquid waste disposal.
- Grease trap waste disposal.
- Hazardous waste removal.
- Oily waste disposal.
- Oily water removal.
- Septic waste removal.
- Septic tank cleaning.
- Packaged waste removal.
- Product destruction.

## 2.2 Site Description

The proposed development is to be located at 5 Kiora Crescent, Yennora in the Cumberland Council LGA.

The development site is identified as Lot 10/-/DP1233715 in the Cumberland Local Environmental Plan (LEP) 2021. The site is zoned as IN1 – General Industrial. Waste management and resource recovery use is permitted with consent in the IN1 zoning.

The site is an irregular shaped land parcel covering an area of 0.7ha (7,221sqm) and located on the northern side of Kiora Crescent, approximately 50m west of the intersection of Kiora Crescent and Norrie Street, Yennora. The site has a frontage of approximately 85.6m to Kiora Crescent.

Up until September 2021, the site was vacant and being used as overflow car park and shipping container storage yards. Construction is now underway for new large industrial warehouses and ancillary offices, a weighbridge, car parking spaces and associated site works and landscaping, as per DA no. DA2019/457/1 dated 31 May 2020 (Cumberland City Council).

The approved development (Appendix A) comprises:

- units:
  - Unit 1 (central part of the overall site): 1,872m$^2$ comprising 487m$^2$ of office area and 1,385m$^2$ of warehouse;
  - Unit 2 (along the eastern boundary of the site): 1,095m$^2$ comprising 93m$^2$ of office area and 1,002m$^2$ of warehouse; and
  - Unit 3 (along the northern boundary of the site): 384m$^2$ comprising 81m$^2$ of office are and 303m$^2$ of warehouse.
- 51 car parking spaces, including 8 visitor parking spaces and 2 accessible car parking space;
- A weighbridge associated with unit 1.

The site is within a 350m walking distance of Yennora Train Station, and within a 450m walking distance of bus stop with regular services to Fairfield Station and Town Hall.

**Figure 1: Satellite Image of Site**


Source: Nearmap, 2022.

## 2.3 Surrounding Area

The site is situated in the IN1 – General Industrial land use zoning under the *Cumberland LEP 2021* (see Figure 3), with the neighbouring lots developed into industrial sheds and yards. The surroundings, in all directions, are mainly General Industrial IN1, with Special Infrastructure SP2 (T5 – Leppington railway line) to the east and south and beyond that, Low Density Residential R2.

Enviro Waste currently operates a separate facility for the processing and treatment of liquid waste on the opposite side of Kiora Crescent from the proposed development (land at 14-16 Kiora Crescent, Yennora). Both Enviro Waste's existing and Kiora One's proposed facilities would complement each other and would manage different types of liquid waste.

The closest sensitive receivers to the site are residences approximately 300m to the south-east, on the opposite side of Yennora Railway Station and Leppington railway line.

The nearest waterway is Prospect Creek, approximately 600 m west of the site. Prospect Creek begins at Prospect Reservoir 6.8 km north west of the site and flows into Georges River at Georges Hall, approximately 5 km south of the site.

The aerial photograph in Figure 2 provides context to the locality and the relationship of the development site with adjoining developments.

**Figure 2: Development Site and its Surrounding**


*Source: Nearmap, 2022.*

**Figure 3: Zone Map of Site and Surrounds**


*Source: ePlanning Spatial Viewer, 2022.*

## 2.4 Existing Approvals

### 2.4.1 Environment Protection Licence

The site does not hold any Environment Protection Licence (EPL) as the previous use was not a scheduled activity under Schedule 1 of the *Protection of the Environment Operations Act 1997 (PoEO Act).*

### 2.4.2 Development Consent

A DA for "*Construction of three (3) industrial units and a weighbridge including associated site works and landscaping*" was approved by Cumberland City Council on 31 May 2020 (ref. DA2019/457/1). The DA was granted 'Deferred Commencement' pursuant to Section 4.16(3) of the Environmental Planning and Assessment Act 1979.

# 3 Proposal Description

## 3.1 Proposal Objectives

Approval is sought for development consent to use the site as a waste processing facility capable of handling up to 270,000 tonnes per annum (tpa) of waste, comprising up to:

- 180,000 tpa of liquid waste (including waste cooking oil, sewage sludge and residues, industrial waste residues);
- 60,000 tpa of drilling muds;
- 20,000 tpa of product destruction; and
- 10,000 tpa hazardous liquid waste.

A preliminary layout plan for the proposed site would be according to Appendix B.

The facility would require to be licenced to receive liquid wastes to include the following:

- Residues from industrial waste treatment/disposal operations – landfill leachates (N205);
- Liquid waste material in glass, plastic or aluminium containers;
- Surface active agents (surfactants), containing principally organic constituents and which may contain metals and inorganic materials (M250);
- Per- and poly-fluoroalkyl substances (PFAS) contaminated materials, including waste PFAS containing products and contaminated containers and PFAS (including PFOS and/or PFOA) contaminated fire-fighting foams (M270);
- Waste oil/ waste, hydrocarbons/ water or emulsions (J120);
- Waste mineral oils unfit for their original intended use (J100);
- Fire debris and fire wash waters (N140); and
- Sewage sludge and residues (K130).

The main objective of the proposal is to increase the liquid waste management capacity of the proponent's business of liquid waste processing, treatment and recovery. The proposed facility would also:

- Create a new facility to efficiently process liquid waste, reducing likelihood of illegal dumping; and
- Enable to operate to a high environmental standard and ensure cleaner production principles are implemented.

## 3.2 Outline of the Proposal

The proposed facility would be capable of accepting and processing up to 270,000 tpa of waste overall. The operational processes to be carried out on site are outlined below.

### 3.2.1 Liquid Waste Processing

The purpose of the facility is to receive waste liquids and process the liquid so suitably cleaned water is removed for discharge to trade waste and remaining sludges are sent offsite to a licenced waste contractor to be further processed.

The processes involved in the site operations are as follows:

- Waste liquids are collected from sites throughout the Sydney Metropolitan Area. Most of the liquids are collected from special purpose tanks which separate the solid residues from the liquids, minimising the solids collected. The waste liquids are collected via pump tankers. The pump is mounted on the truck and runs on the truck's diesel engine. A flexible hose connected to the pump

and tank intake transfers the liquid through the intake nozzle, hose assembly and then into the tank. A pressure valve allows the displaced air to be released to the atmosphere.

- The liquids are delivered to the site. Trucks reverse into the unloading area located inside the dedicated building.
- A flexible hose connected to the outlet point of the tanker truck delivering to the building and is connected to a filter which removes any solids. The filtration devices are on wheels and can be manoeuvred such that a flexible hose connected to the outlet of the filter connected to any one of the tanks within the facility.
- Solids from the filters are manually transferred to a storage bin that once full is classified in accordance with waste guidelines and sent accordingly to a licenced landfill.
- The waste liquids are pumped from the tankers using the main pump within the facility not the tanker pump, the liquids are pumped to a series of settling tanks and pipework at the facility. The main pumps flow direction and valves throughout the facility controls the movement of liquid waste depending on the operations which vary dependant on volumes of different wastes received.
- Before final treatment, the majority of the waste liquid destined for trade waste is pumped from the storage tanks into the DAF (Dissolved air flotation) which separates the solid and remaining oil from the water.
- Oil and sludge are transferred from the DAF to small storage tanks near the DAF. This is removed from site by a licenced waste contractor to be processed as grease trap waste.
- Wastewater from the DAF would be discharged to the Sydney Water sewer under a Trade Wastewater Agreement.

### 3.2.2 Drilling Muds

Drilling muds consist of sludges, slurries and dirty water derived mainly from construction, utility location, utility installation, maintenance and similar industrial operations. Liquid spoil would be processed onsite to remove water and recover a spadable cake which can be used in composting or applied to land as a clean fill.

Drilling muds would be delivered to the site in a similar manner as liquid wastes, being brought to the site in tanker trucks. NDD (also known as hydro excavation) material is typically excavated by blasting earth with pressurised water to loosen it and then use of a high-volume suction vacuum to collect material in a truck mounted tanker.

All storage and processing of the slurry waste would be wholly undertaken within the confines of the shed, including the loading and unloading of trucks.

### 3.2.3 Product Destruction

The site would receive and carry out secure product destruction for products that are, but not limited to:

- Damaged, defect, recalled items;
- Obsolete, out of date products;
- Quarantined stock;
- Production overruns and stock disposal; and
- Unwanted products.

The destruction and disposal of liquid products would involve the following:

- Out-of-date, expired or perishable liquid waste (such as fruit juices, soft drinks, shampoos and soaps) are divided by waste stream and fed into a shredder to separate liquids from packaging.
- Shredded packaging containers (cardboard, plastics, aluminium) are collected and recycled;

- Liquid wastes are collected into intermediate bulk containers (IBCs) and stored on site;
- Liquid soap wastes are collected and sent to an alternative facility for further processing;
- IBCs containing food waste are transported off site to be used in irrigation practices for agricultural properties/farmlands.

The part of the site where product destruction would take place would be secure, including restricted access to materials at all time, within a building dedicated only for destroying material.

### 3.2.4 Bulking and Transfer of Hazardous Liquid Waste

The site would accept a wide range of predominantly packaged hazardous wastes, for identification, classification, sorting, recovery, treatment and bulking, prior to being dispatched for either recovery, recycling or final disposal.

Liquid wastes would be received in various small containers. In order to facilitate their disposal, most would be bulked into larger containers e.g. 1,000 litre Intermediate Bulk Containers (IBCs) or bulk storage tanks, to obtain maximum transport efficiency.

The tanks will be situated in a dedicated bunded area.

## 3.3 Operating Hours

The proposed development will operate 24 hours a day, 7 days a week.

Receival of incoming waste and offtake will occur 24 hours a day, 7 days a week. Processing operations will occur 24 hours a day, 7 days a week with included scheduled downtime for maintenance of plant and equipment.

## 3.4 Construction and Demolition Works

No demolition works are required as part of these proposals and there are no proposed changes to the buildings' footprint at the site.

Some construction works would be required and would consist of:

- Installation of plant and equipment, including the storage tanks; and
- Installation of bunding to contain spills from the processes.

## 3.5 Employment

The proposed development would generate 33 FTE positions during operation. This includes 30 FTE staff working on the processing operations (in 2 x 10 or 12 hour shifts) and 3 FTE office staff. Shifts may be staggered once operational to limit crossover of staff change-over and office staff would typically be limited to day operations. Therefore, the maximum number of staff onsite at any time is expected to be approximately 18 personnel across all uses and shifts in a given day.

## 3.6 Vehicular Access, Traffic Generation and Parking

### 3.6.1 Vehicular Access

Access to the site is provided off Kiora Crescent, via two 14.5m wide access points, located on the site frontage, towards the south-eastern and south-western corners of the site.

It is proposed that the site would operate a one-way system whereby vehicles enter the site via the south-western driveway and exit via the south-eastern driveway.

### 3.6.2 Traffic Generation

It is expected that, staff vehicle traffic experienced at the site would be a maximum of approximately 18 staff vehicles in a day (18 cars in and 18 cars out). In addition to the traffic generated by staff employed at the site, the site would generate on average 150 trucks per day over a 24-hour period, or 6 trucks per hour (ie 6 trucks coming in, and 6 trucks leaving the site per hour).

This is based on the annual capacity of the site (270,000 tpa ≡ 270,000,000 litres) and operation of the site 7 days per week. Material would be transported in heavy rigid vehicles (HRVs) ranging from 2,000 to 22,000 litres in size. The average truck capacity is 10,000 litres.

### 3.6.3 Parking

There is ample parking for passenger vehicles at the site. 51 car spaces are available to staff and visitors. Each shift requires 15 staff with 3 additional office staff during the day. Taking into account an overlap of staff on site during changeover, a maximum of 33 spaces are required to accommodate staff parking needs. Additional spaces would be provided for visitors and mobility parking - 2 accessible car parking space are provided immediately adjoining the various buildings.

No trucks will park at the site outside of delivering or picking up material. Similarly, no trucks are proposed to be parked at the site overnight.

## 3.7 Site Security

Staff will generally be on site 24/7 which provides security. The industrial buildings will have security provisions including fencing, gates and lighting.

# 4 Statutory and Strategic Planning Framework

## 4.1 Strategic Context

The proposed development will support and be consistent with a number of statutory policies including the "*Waste Avoidance and Resource Recovery Act, 2001*" (WARR Act) and the "*NSW Waste and Sustainable Materials Strategy 2041*".

The *NSW Waste and Sustainable Materials Strategy 2041* is a key component of the Government's vision for the environmental, social, and economic future of NSW and is supported financially by the *Waste Less, Recycle More* initiative. The NSW government is in the process of further developing the 20-year strategy which will focus on sustainability, reliability and affordability of waste and recycling in NSW towards 2041.

In line with the most relevant Strategy objectives and targets to the site, the proponent's operations would contribute to:

- Reduce total waste generated by 10% per person by 2030.
  - By offering a waste recycling service, the proposed development will contribute to reduce waste generation from virgin resources.
- Have an 80% average recovery rate from all waste streams by 2030.
  - The proposed development would create additional capacity for commercial and industrial liquid waste recycling operations, establish additional liquid waste recycling options, thereby supporting an increase in the recycling rates for these wastes.
  - The proposed drilling mud processing has the potential to divert 99% of the stream from landfill.
- Significantly increase the use of recycled content by governments and industry.
  - The processing facility would assist to increase the availability of recycled material for input back into production and beneficial reuse.
- Divert more waste from landfill – by 2030 increase the waste diverted from landfill to 75%.
  - Product destruction for instance, would ensure packaging from waste products is diverted from landfill and recycled.
- Manage hazardous wastes.
  - The proposed development would significantly increase the processing and treatment capacity for liquid and hazardous waste and will allow for better management and recycling potential of this type of waste.

## 4.2 Statutory Context

### 4.2.1 Environmental Planning and Assessment (EP&A) Act 1979

The Environmental Planning and Assessment Act 1979 (EP&A Act) and the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) provide the framework for the assessment of the environmental impact of proposed development in NSW.

Part 3 of the EP&A Act provides for the formation of environmental planning instruments (EPIs), which can take the form of Local Environmental Plans (LEPs) or SEPPs. EPIs contain provisions that control the permissibility of development and identify when development approval is required. EPIs that are applicable to the Proposal are:

- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (SEPP) (Transport and Infrastructure) 2021*
- *Cumberland Local Environmental Plan (LEP) 2021*

- *Cumberland Development Control Plan (DCP) 2021*

### 4.2.2 State Environmental Planning Policy (Planning Systems) 2021

This proposal is classified as State Significant Development under Schedule 1, Section 23 of the *State Environmental Planning Policy (Planning Systems) 2021* as it is:

> *(3) Development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste.*
>
> *(5) Development for the purpose of hazardous waste facilities that transfer, store or dispose of solid or liquid waste classified in the Australian Dangerous Goods Code or medical, cytotoxic or quarantine waste that handles more than 1,000 tonnes per year of waste.*
>
> *(6) Development for the purpose of any other liquid waste depot that treats, stores or disposes of industrial liquid waste and*
>
> > *(a) handles more than 10,000 tonnes per year of liquid food or grease trap waste, or*
> >
> > *(b) handles more than 1,000 tonnes per year of other aqueous or non-aqueous liquid industrial waste.*

State Significant applications are submitted to the Department of Planning Infrastructure and the Environment and the Minister for Planning is the consent authority.

### 4.2.3 State Environmental Planning Policy (Transport and Infrastructure) 2021

Pursuant to Division 23, Clause 2.152 of the *State Environmental Planning Policy (SEPP) (Transport and Infrastructure) 2021*, development for the purpose of a waste or resource management facility (including resource recovery facility) may be carried out by any person with consent on land in a prescribed zone.

The proposal is consistent with the definition of a waste or resource management facility. The site is located within a prescribed zone (IN1 General Industrial). Consequently, the development is permissible with consent pursuant to the provision of the *Transport and Infrastructure SEPP*.

With reference to Chapter 2.7 (1) *Relationship to other environmental planning instruments* of the *Transport and Infrastructure* SEPP 2021:

> *Except as provided by subsection (2), if there is an inconsistency between this Chapter and **any other environmental planning instrument**, whether made before or after the commencement of this Chapter, **this Chapter prevails to the extent of the inconsistency**.*

### 4.2.4 State Environmental Planning Policy (Biodiversity and Conservation) 2021

The *Biodiversity and Conservation SEPP 2021* is a consolidation of 11 environmental planning instruments and came into effect on 1 March 2022.

Chapter 11 of the SEPP replaces the *Greater Metropolitan Regional Environmental Plan No 2 – Georges River Catchment (Georges River REP)* and relates to the protection of water quality within the Georges River Catchment. The Site is within the boundary of the Catchment as indicated by the catchment map.

Part 11.3 *Planning requirements*, Section 22 states:

> *Development for the purpose of waste management facilities or works, being development of a Waste Management Facility or Works described in Schedule 3 (Designated Development) to the Environmental Planning and Assessment Regulation 1994.*
>
> ***Planning controls***
>
> *Development consent required unless on flood liable land, **in which case it is prohibited**.*
>
> ***Specific matters for consideration***

*A system is to be required to manage leachate surface controls on the land on which the waste management facility or works is or are proposed.*

*A site management plan is to be required for the land on which the waste management facility or works is or are proposed.*

*The likelihood of groundwater contamination.*

*The adequacy of the proposed leachate management system and surface water controls.*

*The long-term stability of the final landform and the adequacy of the site management plan.*

*Where the proposed development involves extraction of material, whether an adverse impact on the Georges River or its tributaries will result.*

The Biodiversity and Conservation SEPP thus precludes development of the site for the purpose of waste management facilities.

Chapter 11.2 (1) of the Biodiversity and Conservation SEPP states that *if this Chapter is inconsistent with another **regional environmental plan or a local environmental plan**, then this Chapter prevails to the extent of the inconsistency, subject to section 36 (4) of the Act.*

It has already been noted that the *Transport and Infrastructure SEPP* prevails over **any other planning instrument**. In this instance, the *Transport and Infrastructure SEPP* ought to prevail over the *Biodiversity and Conservation SEPP*, as it prevails over *any planning instrument* and not only a *regional environmental plan* or *local environmental plan.* Thus the development is permissible, under the *Transport and Infrastructure SEPP* within the designated IN1 site zoing.

The aforementioned *specific matters* for consideration will be assessed within this EIS.

**Flood Liable Land**

The following definitions are also noted –

The Definition of Flood Liable Land in the *State Environmental Planning Policy (Biodiversity and Conservation) 2021*:

***Flood liable land*** means land identified in an environmental planning instrument as flood liable land.

In the Cumberland LEP 2021:

**5.21 Flood planning**

***flood planning area*** has the same meaning as it has in the Floodplain Development Manual.

Within the *Floodplain Development Manual: the management of flood liable land* (April 2005, ISBN 0 7347 5476 0).

***Flood prone land*** is *Land susceptible to flooding by the PMF event. Flood prone land is synonymous with flood liable land*.

On the basis of the above definitions, flood liable land in the LEP is land susceptible to the PMF event.

The proposed development site has previously been approved for the construction of 3 industrial units which would be adapted to the uses identified as part of the proposed development. All industrial buildings approved have been designed and modelled to mitigate the impact of flooding at the site and according to Flood Study completed by SGC in November of 2019, are not impacted by the PMF event. Since the development area is not susceptible to the PMF event it is considered that the provisions of the *Biodiversity and Conservation* SEPP 2021, as it relates to the permissibility of the proposed use on *flood liable land* need not apply.

With consideration to the above points, the proposed development is regarded to be permitted with consent. Given the nature and scale of the proposed use, approval would be sought as State Significant Development under Schedule 1, Section 23 of the *State Environmental Planning Policy (Planning Systems) 2021.*

### 4.2.5 Cumberland Local Environmental Plan (LEP) 2021

The new *Cumberland Local Environmental Plan (LEP) 2021* came into effect on 5 November 2021. The Cumberland LEP 2021 provides a unified set of controls that effectively replaces the following three LEPs that applied to the Cumberland Local Government Area (LGA):

- Auburn LEP 2010.
- Parramatta LEP 2011.
- Holroyd LEP 2013.

The LEP guides planning decisions for local government areas. It provides the legislative framework for land use and development in a LGA through land use zones and planning controls. The LEP consists of a written instrument and a series of maps

The site is zoned IN1 General Industrial under the *Cumberland LEP 2021*. The proposed development is consistent with the definition of a "waste or resource management facility". The development is permissible with consent in accordance with the IN1 zone and is consistent with the objectives of the IN1 zoning.

### 4.2.6 Cumberland Development Control Plan (DCP) 2021

The new *Cumberland Development Control Plan (DCP) 2021* came into effect on 5 November 2021.

The Cumberland DCP 2021 now provides a unified set of controls that effectively replaces the following three DCPs that applied to the Cumberland Local Government Area (LGA):

- Auburn DCP 2010.
- Holroyd DCP 2013.
- Parramatta DCP 2011.

The DCP provides guidance for the design and operation of development within a Local Government Area (LGA) to achieve the aims and objectives of the Local Environmental Plan (LEP).

The application would not result in the construction of additional infrastructure, however the provisions of the Cumberland DCP 2021 will be considered during the application.

### 4.2.7 Protection of the Environment Operations Act 1997

Proposed activities at the development are listed under Schedule 1 Clause 34 of the *Protection of the Environment Operations (PoEO) Act 1997* as ‘resource recovery’ activities and therefore require a licence to operate.

# 5 Options Analysis

## 5.1 Objectives of Proposal

The objectives of this proposal are to:

- Receive and process of up to 270,000 tpa of waste from sources as described in Section 3, from the Sydney metropolitan region;
- Develop a new waste processing facility to efficiently process liquid waste, reducing likelihood of illegal dumping;
- Minimise adverse impacts to the environment and the local community; and
- Create jobs for the stimulus of the local economy.

## 5.2 Option 1: Receive and process 270,000 tpa of waste at the site at 5 Kiora Crescent, Yennora

This option involves developing the site at 5 Kiora Crescent into a liquid waste processing, NDD mud processing, product destruction and hazardous materials transfer facility capable of receiving and processing up to 270,000 tpa of waste. The site is suitable for such a use, both in terms of site infrastructure (with minimal additional work required beyond approved infrastructure) as well as from a planning perspective (resource recovery, waste storage and transfer permitted with consent in the IN1 General Industrial zone).

The site is situated in an industrial area close to major arterial roads that will connect the site to the rest of metropolitan Sydney without causing undue disturbance to residents. Residents and other sensitive receivers are located a substantial distance from the site and there are therefore no expected impacts to residential amenity.

Industrial buildings currently under development at the site according to existing approvals have been designed to accommodate a range of uses according to this proposal. Additionally, the proximity of the proponent's existing water treatment facility at 14-16 Kiora Crescent, will allow for synergies and efficiencies between the two operations. There will be some overlap in the capabilities of the proposed facility and the existing facility at 14-16 Kiora Crescent, however it is intended that once operational, the two facilities would handle different liquid waste types, meaning both facilities would become more specialised in their capacity to process and handle liquid wastes. Once the liquid waste treatment component of the facility at 5 Kiora were to come online, 14-16 would be capable of becoming more specialised in its capacity to handle and processes wastes, for example, more grease trap and industrial derived liquid wastes.

Based on current growth expectations in liquid waste treatment, hazardous materials/dangerous goods management and drilling mud processing, it is expected that the proposed development could expect to receive the proposed quantities of materials within a reasonable growth period (5-10 years of operating). The proposed development would provide processing and transfer capacity for nominated streams both in the near- and long-term future, given the proposed capacities.

## 5.3 Option 2: Increase capacity at the proponent's existing site at 14-16 Kiora Crescent

Enviro Waste currently operates a separate facility for the processing and treatment of liquid waste on the opposite side of Kiora Crescent from the proposed development (land at 14-16 Kiora Crescent, Yennora). The existing site is permitted to process up to 110,000 tpa of liquid waste, and has a storage capacity is 477 tonnes, equivalent to approximately one and a half days of processing.

As such, the existing site cannot accommodate the additional capacity proposed as part of this application, in such way to ensure safe, efficient manner and to the highest possible environmental standards.

In addition, both existing and proposed facilities would operate different processes for different type of liquid waste, complementing rather than duplicating each other.

## 5.4 Option 3: Develop an alternative site for the proposed use

This option would require additional site search, with associated time and financial costs. Kiora One have already carried out a preliminary study looking at alternative sites, to assess their suitability, availability and any potential environmental and planning constraints associated with developing these.

As such, the subject site was deemed the preferred option and the proponent has now purchased the site

## 5.5 Option 4: 'Do Nothing' Option

The consequences of not proceeding with the project would be to deny the wider community of the benefits resulting from the increased capacity of liquid waste treatment and recycling. If the 'do nothing' option was implemented, the demand on liquid waste treatment and recycling would only increase, thus resulting in a potential increase of the cost of this service across NSW, incentivising illegal dumping of liquid waste.

The 'do nothing' option also does not align with the direction of Enviro Waste group as a business and is likely to limit the ability to manage waste streams proposed due to limited regional alternatives.

## 5.6 Preferred option

Option 1 is preferred due to the need for increasing capacity for resource recovery, and particularly the management and treatment of liquid waste, in the Sydney metropolitan region. The suitability of the site and its geographic location in relation to its proximity to sensitive receptors, feedstock generation, accessibility and offtake partners were all taken into consideration as part of the site selection process.

# 6 Potential Environmental Impacts

## 6.1 Soils and Contamination

Since the proposed development is situated on a pre-developed site, no major excavation works are anticipated during the developmental works of the project. It is anticipated that any minor dust erosion and sedimentation would be managed in accordance with standard construction management practices. No impacts on groundwater are foreseen during these minor earthworks.

The subject site is not classed on an area of acid sulfate soils on the Cumberland LEP 2021 maps.

## 6.2 Heritage

The site is not listed as being a heritage site or containing heritage items under the Cumberland LEP 2021. An additional search of the NSW Heritage Database did not return any items at the address.

No items or areas of Aboriginal Significance are known to occur within, or adjacent to, the subject land. A search of the Aboriginal Heritage Information Management System (AHIMS) database confirms that there are no significant Aboriginal sites or locations within a 1km buffer of the subject site.

Given the industrial context of the area and land uses and a lack of recorded heritage items, it is unlikely that the proposed development would have any impact on Aboriginal heritage.

## 6.3 Bushfire

The site is not located in bushfire prone land. There is no expected hazard with regard to bushfire related to this project.

## 6.4 Waste Management

The purpose of the facility is to manage liquid waste to improve liquid waste treatment, recycling and recovery. The overall impact on liquid waste management is therefore positive.

The size of the site and the sheds are sufficient for the proposed throughput, taking into account the space required for vehicle movements, the equipment and machinery, and the treatment processes.

The site will be managed in accordance with an Operational Environmental Management Plan (OEMP), which is a compilation of plans and policies that ensure the safe and efficient operation of the site. The OEMP will feature:

- Environmental Management System, including:
  - Organisation chart;
  - Statutory requirements;
  - Reporting requirements;
  - Complaints and community consultation; and
  - Training schedule.
- Risk Assessments;
- Monitoring and Review protocols;
- Acoustic Management Plan;
- Traffic Management Plan; and
- Pollution Incident Response Management Plan.

The site will be maintained to be clean and tidy at the conclusion of each shift.

## 6.5 Water Management

The site is covered with hardstand and no significant ground excavation is anticipated as the development proposes to use the existing sheds. Some excavation or ground-breaking works may be required for the installation of plant and equipment, including the storage tanks or bunding to contain spills from the processes.

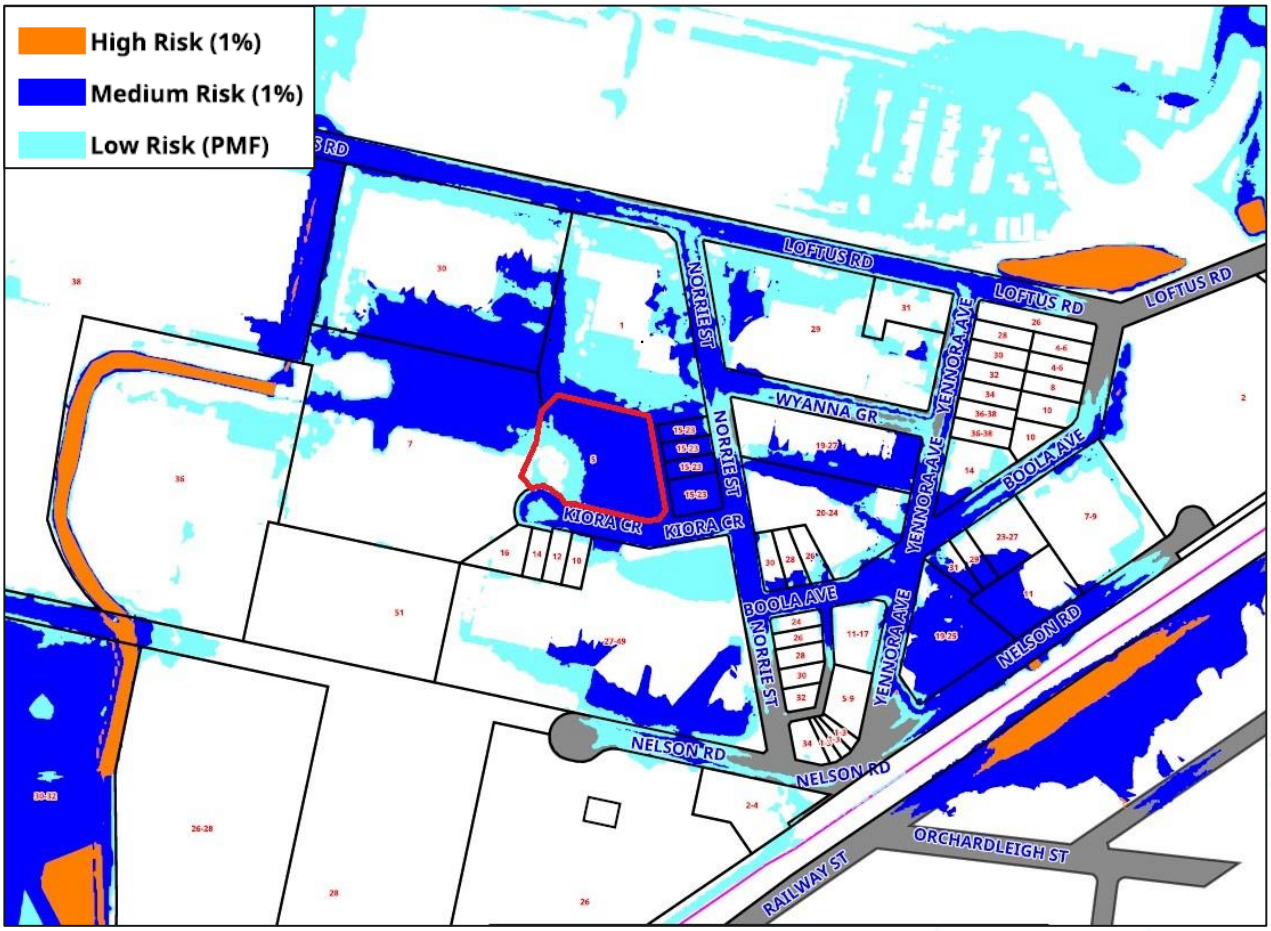
The EIS will include design of surface water controls to prevent uncontrolled release of water from the site. These controls will be described in the EIS.

During the construction phases, standard measures to contain runoff and sediment will be implemented.

## 6.6 Flooding

Flood mapping conducted by Cumberland Council (published October 2021) shows that the site is at medium to low risk for flood events (See Figure 4).

**Figure 4: Flood Risk Precincts Mapping**




*Source: Cumberland Council Flood Risk Precincts Map 4.*

### Medium Flood Risk Precinct

This has been defined as land below the 1% AEP flood subject to low hydraulic hazard (in accordance with the provisional criteria outlined by the Floodplain Development Manual). Development within this Precinct is possible, however appropriate flood management measures must be implemented, to ensure the safety and protection of both person and property during a critical storm event.

**Low Flood Risk Precinct**

This has been defined as all other land within the floodplain (i.e. within the extent of the probable maximum flood) but not identified as either a high flood risk precinct or medium flood risk precinct, where risk of damages are low for most land uses. Development within this Precinct is possible, however consideration for development is needed to ensure that property is protected.

**Flood Study Report, 5 Kiora Cr, November 2019**

A flood assessment report for the proposed industrial development located at 5 Kiora Crescent, Yennora (DA2019/457/1 dated 31 May 2020) was produced by SGC Engineering in November 2019. The report is attached as Appendix C.

The report indicates that the site is affected by overland flooding from the local upstream catchment and primarily the surcharging of council's infrastructure surrounding the development on Kiora Crescent. The runoff from the localised upstream catchment travels overland through the low-lying areas until it reaches the main open culvert structure downstream of the site and connects to Prospect Creek. In this case, the low-lying area is along the middle of the site.

The study investigated the impact of the industrial development on the overland flooding behaviour and its impact on the flood levels both upstream and downstream.

The study proposed mitigation measures that ensured that the development would not have any adverse impact on flooding behaviour in its vicinity. The proposed measures required minor cutting in nominated landscape and car park areas, construction of internal pit and pipe networks, and nominated structures raised on piers.

These measures are being implemented as part of the construction of approved infrastructure at the site which is due for completion by early-mid 2023. As such, it is not expected that the industrial development at the site would have any adverse impact on the flooding behaviour elsewhere in the floodplain.

## 6.7 Biodiversity

The development would be unlikely to have an impact on species or their habitat given the existing industrial nature of the site and immediate surrounding area.

The site is brownfield in nature and exists in a well-established industrial zone

Preliminary investigations via a search of the *NSW Values Map* identified no threatened or endangered flora and fauna populations are located on the site. No existing trees or remnant vegetation would be removed as part of the proposal.

Considering that the site is previously developed, and that no vegetation will be removed, the existing biodiversity values of the site would not be affected by the proposal.

Consequently, a BDAR waiver request is attached as Appendix D.

## 6.8 Hazards

The site will store small quantities of LPG, lime and sodium hydroxide.

Chemical management requires a site to comply with the requirements of the *Work, Health and Safety Regulation 2017*.

Requirements in Australian Standards also need to be applied when a site stores more than minor quantities of a hazardous substance/chemical belonging to one of the nine Classes of Dangerous Goods. The basis of chemical management safeguards for these classes are described in the following Australian Standards:

- AS 1940–2017 The storage and handling of flammable and combustible liquids;
- AS 3780-2008 The storage and handling of corrosive substances;

- AS/NZS 1596:2014 The storage and handling of LP Gas; and
- AS 4332–2004 The storage and handling of gases in cylinders.

Storage of all hazardous chemicals would comply with the above standards. General controls that need to be met for adequate chemical management at the site are as follows:

- Storage of LPG cylinders outside the building, inside a lockable cage, in accordance with AS/NZS 1596:2014;
- Provision of adequate fire protection services;
- Provision of spill kits near chemical storage area;
- Site securely locked when not in operation;
- Up to date environmental and safety management procedures and systems; and
- Personnel regularly trained and competency tested in matters regarding the use of firefighting equipment.

## 6.9 Traffic

Access to the site is from Kiora Crescent which ends in cul-de-sac. Beyond this, the site is well located between the A28 Cumberland Highway to the northwest and the A22 Hume Highway to the south, providing access to the M4 Western Motorway to the east.

**Figure 5: Site Location in Context with Sydney Road Network**


*Source: SIX Maps, 2022*

The facility is expected to accommodate 150 trucks per day entering the site for delivery and offtake of liquid waste. This equates to 6 trucks per hour (12 movements) or one truck movement every 5 minutes. Peak periods may result in higher per hour trucks accessing the site, however it is expected the site would be capable of accommodating a higher than average traffic load which would be detailed in the EIS.

In addition, it is expected that up to 18 staff vehicles would access the site per day (36 movements).

No parking would be provided for trucks at the site. There are 51 car spaces available to staff and visitors at the site, which is more than adequate for the 33 staff members who would be working at the premises over two shifts.

Traffic impacts will be capable of being managed given the nature of the site and surrounding industrial zone – internal traffic movements would be managed with a one-way system whereby vehicles enter the site via the south-western driveway and exit via the south-eastern driveway.

Additional traffic generated by the facility is unlikely to overburden the local roads.

## 6.10 Visual Amenity

The site is located within an established industrial area in Yennora and is surrounded by large industrial and warehouse buildings and is IN1 zoned which is General Industrial. The site is additionally screened from public view at Kiora Crescent through the landscaped plantings of shrubs and trees at the street frontage. No vegetation is proposed to be removed under this development.

Since the project site is located within a broader industrial precinct with the existing sheds already permitted and built at the site, there will be minimal visual impacts due to the developmental works of this project.

## 6.11 Noise

Operational noise is anticipated from truck movements, loading/unloading of waste and the operation of processing equipment within the building.

- The site is surrounded by a railway track, industrial development and warehousing buildings.
- The nearest residential receptors are located approximately 300m to the south east of the site.

It is considered unlikely that noise will affect the amenity of the closest sensitive receptors or industrial premises.

## 6.12 Air Quality

### 6.12.1 Construction Phase

Minor construction works are proposed to enable the development to take place.

Construction dust related impacts are anticipated to be minor and able to be managed through standard dust controls such as watering, covering soil, and reducing truck speeds.

### 6.12.2 Operational Phase

Impacts to air from the proposed development are primarily related to odour emissions.

Chemical compound (eg. volatile organic compounds (VOCs), vapours, noxious fumes) and dust/particulate emission levels are likely to be negligible or deemed absent from the proposed development.

The majority of sources of odour will be generated within the buildings receiving liquid wastes including residues from industrial waste treatment/disposal operations, surfactants, waste oil/hydrocarbon mixtures/emulsions in water, among other liquid waste materials.

The waste liquid brought on site is pumped directly from the vacuum tankers into tanks therefore minimising release of odorous emissions during the unloading process. Unloading is undertaken within a bunded area thus minimising the spread of potentially odorous oils should a spill occur.

Similarly the untreated liquids are securely stored in tanks in the bunded area limiting the movement of odorous liquids if a leak were to occur. All tanks are almost fully enclosed with only small diameter breathing vents which vent to the biotrickling filter system and then are dispersed through a stack.

The facility used the following mitigation measures:

- Biotrickling filter system: displaced air from tank filling is vented through a biotrickling filter, uses a packed bed consisting of porous material that bacteria affix to and create a biomass film, this film degrades pollutants that are transferred to the packed bed as the air/gas is transported through the material;
- Vertical dispersion stack: From the biotrickling system the site would discharge the filtered air vertically through a stack above the roofline;
- Indoor operations: All liquid waste handling occurs within the building, reducing odour impacts from fugitive emissions; and
- Deodoriser: The deodoriser system would include spray points positioned at the top of the front roller doors and spray inwards within the building. Additional spray points would be positioned on the back wall of the facility pointed towards the filtering/screening process, and would spray every 15 minutes.

# 7 Stakeholder Engagement

The Proponent is committed to consulting with the local community and other stakeholders, regarding the proposed development. The consultation process will ensure that stakeholders have the opportunity to understand and comment on the development.

The Proponent, through MRA Consulting group intends to consult with:

- Government Agencies (through the SEARs);
- Nearby landowners and occupiers that may be affected by the Proposal; and
- Nearby businesses that may be affected by the proposal.

The EIS will describe the consultation process and the issues raised and identify where the proposal has been amended in response to these issues. If amendments have not been made, the EIS will explain the reasons behind the decision to retain those elements of the development.

# 8 Justification and Conclusion

The demand for liquid waste recycling around Sydney metropolitan region and the wider NSW has been increasing. The site would provide much needed capacity to increase process quantities of liquid waste, thus reduce the likelihood of illegal dumping.

The subject site has been chosen for the proposed development for the following reasons:

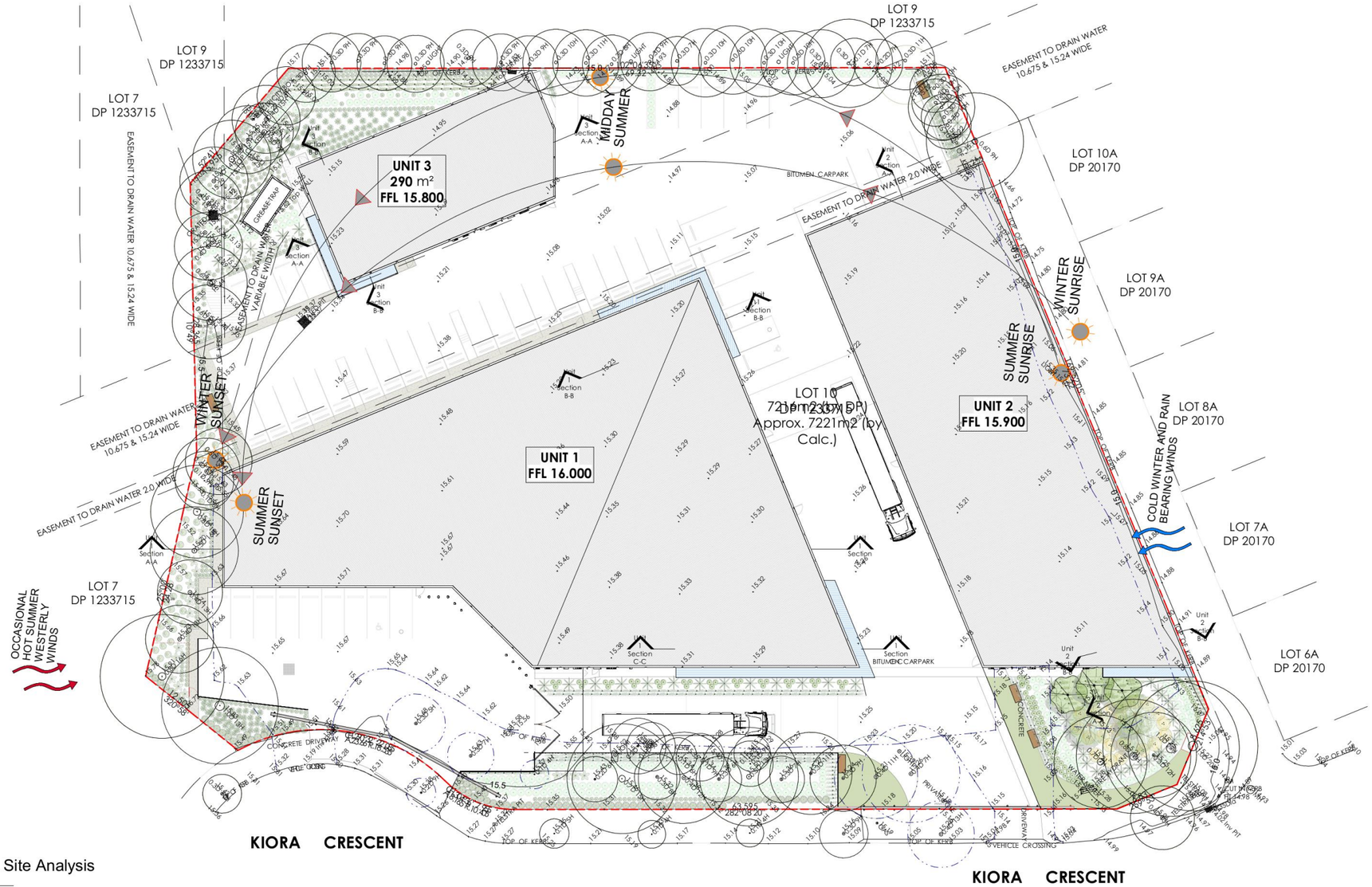
- It is on appropriately zoned industrial land with minimal impacts to the surrounding neighbourhood.
- It has ample room and buildings available to cater for the proposed operations.
- It is located in a well-established industrial area with adequate services.
- It is not in a sensitive land use area and has adequate separation distance from residential areas and ecologically sensitive receivers (i.e. Waterways).
- The proposed development would service areas throughout NSW and is well located with Transport routes are readily available, and without detrimentally affecting the local road network.

The proposed development will have extensive environmental safeguards to provide assurance with regard to the expected degree of environmental impacts.

The project will provide employment opportunities by creating 33 ongoing operational jobs.

The project is justified socially (by new job creation), environmentally (by ongoing and sustainable management of liquid waste), and economically (by supporting the liquid waste recycling and recovery market). It aligns with current and future land use for the surrounding area and with the resource recovery aims and objectives of the *NSW Waste and Sustainable Materials Strategy*.

# Appendix A Approved Site Plans (DA2019/457/1)




1 Site Plan & Site Analysis Plan
1 : 200

| REV | DESCRIPTION | DATE | BY |
|---|---|---|---|
| A | DEVELOPMENT APPLICATION | 21/10/19 | CB |

FOR DA APPROVAL

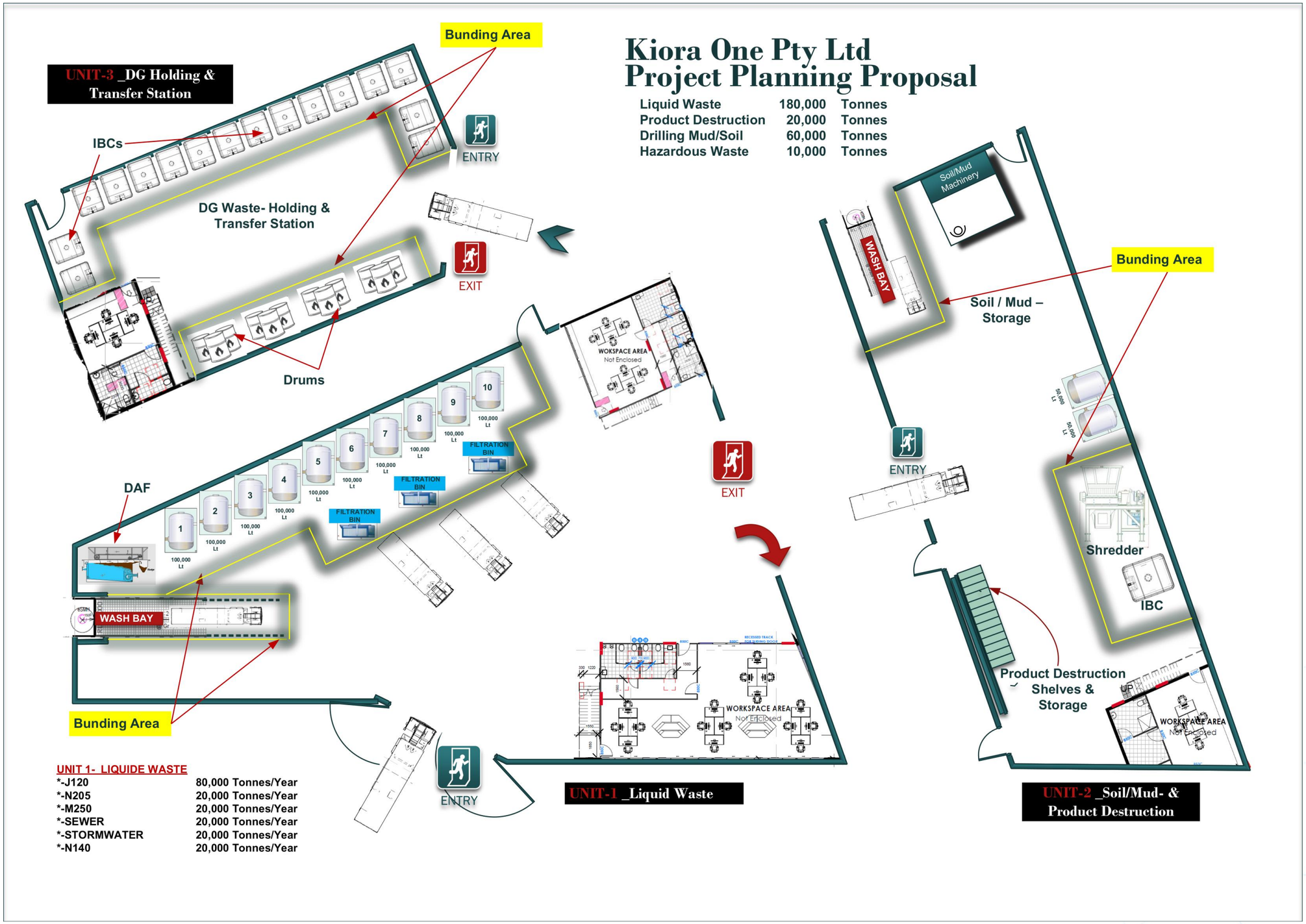
baini design

BAINI DESIGN
ABN 51 068 732 593
18 Villiers street
Parramatta, NSW 2150
Sydney, Australia
Phone + 61 2 9188 8250
info@bainidesign.com.au
www.bainidesign.com.au

PROJECT TITLE
INDUSTRIAL DEVELOPMENT
5 KIORA CRESCENT, YENNORA 2161
DRAWING TITLE
SITE PLAN & SITE ANALYSIS PLAN

| PROJECT NUMBER | DRAWING NUMBER | DATE | REVISION |
|---|---|---|---|
| 18117 | 03 | 10/21/19 | A |
| | SCALE @ A1 | DRAWN BY | CHECKED BY |
| | 1 : 200 | GA | CB |

# Appendix B Industrial Shed Internal Layout Plans



**MRA Consulting Group**

Suite 408 Henry Lawson Building
19 Roseby Street
Drummoyne NSW 2047

+61 2 8541 6169
info@mraconsulting.com.au
mraconsulting.com.au


MRA Consulting Group