

NEW SOUTH WALES

Date: 22 February 2013

Ashley Cheong
Major Projects Assessment
Department of Planning and Infrastructure
23-33 Bridge Street
SYDNEY NSW 2000

Dear Mr Cheong,

**RE: Final Environmental Impact Statement for exhibition
Veolia Camellia Recycling Centre (SSD- 4964)**

Veolia is writing in response to the Department of Planning and Infrastructure's (DPI) 6 September 2012 request for further information and minor revisions to the Environmental Impact Statement (EIS). The EIS (originally submitted to DPI on 27 August 2012) detailed Veolia's proposed Materials Recycling Facility at 37 Grand Avenue, Camellia (the Proposal).

After further consultation and clarification with DPI, Veolia are re-submitting the EIS with the required changes addressed in order to commence Public Exhibition. Table 1 attached presents the changes requested by DPI and other government stakeholders and how these requests have been addressed within the revised EIS.

In addition, Veolia has made minor adjustments to:

- Access and egress details – alteration to truck navigation around the site has resulted in minor revisions to the Noise Impact Assessment.
- Existing infrastructure – the three liquid waste tanks at the property entrance will remain on site, but will no longer form part of this Proposal.

Enclosed please find Veolia's official submission for Public Exhibition of the EIS: 11 hard copies and 16 electronic copies on CD-ROM.

We trust that we have met all of DPI's requirements accordingly.





Please contact me on (02) 9841 2902 if you have any queries or wish to discuss any aspect of the submission in more detail.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'CHH', located below the 'Yours sincerely,' text.

Christine Hodgkiss
NSW Strategic Planning & Development Manager
Veolia Environmental Services (Australia) Pty Ltd



#	Agency	Agency comment	Revision to EIS	Section
1	DP&I	Executive Summary The Executive Summary states that the existing stormwater system has capacity but would be upgraded. Can more explanation be provided? ...	Additional detail on the stormwater upgrade is provided within the Executive Summary	Executive Summary <i>Hydrology and Flooding</i>
2	DP&I	... This should also be clarified further in Section 7.8	Additional detail added to Section 7.8 to clarify	Section 7.8
3	DP&I	Statutory Context The Statutory Context provided in section 3.1.1 is incorrect. The PAC may not be responsible for determination – this depends on political contributions, number of submissions and whether council objects to the proposal.	This has been amended to show that DP&I are the consent authority.	Section 3.1.1
4	DP&I	Hydrology – Section 7.7 (now Section 7.8) This chapter is particularly confusing, with the issues of flooding / stormwater / operational water use and wastewater unclear. See comments below on 'general readability'. Each of the issues identified by the DGR's (under 'Soil and Water') should be under its own heading, with predicted impacts closely followed by the proposed mitigation measures.	This chapter has been re-organised as follows: - Existing Environment • Groundwater and Salinity • Flooding • Stormwater Management - Construction Impacts • Erosion and Sediment Controls • Groundwater and Salinity • Flooding - Construction Mit Measures • Groundwater and Salinity - Operational Impacts • Stormwater • Flooding • Water Balance and Wastewater - Operational Mit Measures • Stormwater • Flooding • Water Balance and Wastewater	Section 7.8
5	DP&I	<u>Flooding</u> Should Section 7.7.2 be given a different heading such as Flooding?	Flooding now assessed under its own heading	Section 7.8



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6	DP&I	<u>Water balance</u> Table 7-15 on page 100 appears without a prior heading – perhaps this should read ‘Operational Water Use’? In addition the DGR’s require a detailed water balance for the development. <u>Parking</u> The EIS states the proposed facility is to be used for educational purposes, and describes viewing areas and an education centre. It is noted, however, that no provision has been made for bus parking. This should be addressed in Section 7.9.	The title for Table 7-15 now reads “Estimated Operational Water Usage”	Table 7-15
7	DP&I	<u>Parking</u> The EIS states the proposed facility is to be used for educational purposes, and describes viewing areas and an education centre. It is noted, however, that no provision has been made for bus parking. This should be addressed in Section 7.9.	Bus parking has been included within Section 7.9.4 Operational Impact of the Traffic and Transportation chapter. Figure 6.1 now indicates the bus parking location.	Section 7.9.4 and Figure 6.1
8	DP&I	<u>General readability</u> The assessment of key issues is slightly confusing due to the chosen format, for example see Section 7.2 (regarding dust and odour). For the majority of key issues you have chosen the following order: • Background and Existing Conditions • Construction Impacts • Operational Impacts • Construction mitigation measures • Operational mitigation measures If you could use the following suggested order, general document readability would be improved. • Background or existing conditions • Construction impacts • Construction mitigation measures • Operational impacts • Operational mitigation measures	Section 7. Key Issues has been reordered	Section 7



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9	Roads & Maritime Services	...RMS recommends that a Masterplan should be developed for the area bounded by James Ruse Drive to the west, Parramatta River to the north, M4 Motorway to the south, and Duck River to the east. The Masterplan should identify all the improvement works required and should identify a funding mechanism to implement these improvement works. The applicant should financially contribute towards the implementation of this Masterplan...	CH2M HILL discussed this comment with Pahee Sellathurai of RMS via telephone Tuesday 2 October 2012. The conversation confirmed that this is an RMS recommendation to DP&I and no action is required by Veolia until the recommended Masterplan considerations begin. Veolia agrees with the RMS comment in principle. No revision to EIS.	-
10	Parramatta Council	<u>Acid Sulfate Soils</u> The site is identified as having ASS Class 3 which requires an ASS Management plan if there are works below 1m of the site. This needs to be clarified. Page 110 states that an ASSMP is to be implemented for the duration of the construction which implies that excavation will be deeper than 1m. Council would ordinarily request this ASSMP be submitted with an application before any determination is made.	Christine Hodgkiss (Veolia) discussed via telephone with Council and DP&I to confirm that the ASSMP will be provided as part of the eventual Camellia Recycling Centre Construction Environmental Management Plan rather than in the EIS.	
11	Parramatta Council	<u>Flooding</u> Section 7.7 of the EIS discusses the flood affectation of the land and the matters that Council must consider for development upon flood affected land. The EIS however does not appear to adequately address these issues. For example, p 102 addresses some of the issues but states that an engineer's report would certify that the development would not increase flood affectation elsewhere. The engineer's report needs to be submitted and considered before such a statement can be made. Without an engineer's report, how will we know if there is a loss of flood storage area, diversion of flooding upon nearby properties etc. A detailed flood engineer's report needs to be submitted with the EIS.	The Hydrology section has been revised following review of ground and topographical studies and Parramatta City Council documents (Local Flood Risk Management Policy 2006, Lower Parramatta River Floodplain Risk Management Study & Plan 2005). In addition, the building slab floor level has been amended in Figure 6.2.	Figure 6.2, Section 7.8
12	Parramatta Council	<u>Indigenous Heritage</u> Section 8.4 of the EIS states that the proponent has contacted both relevant local Aboriginal Land Councils regarding the proposed development, however there is no discussion as to any correspondence/advice received from the land councils. This should be incorporated into the EIS. A signed statement from the author of the EIS, certifying that the information contained within the document is neither false nor misleading was not present.	Correspondence with the local aboriginal land councils has been included in Section 8.4 Indigenous Heritage.	Sections 8.4.1 and 8.4.2
13	NSW EPA		Completed in the front of the document	Page v



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14	NSW EPA	Table 7-5 of the EIS does not show daytime criteria for M1 – John Street. These should be added as per Table 3 of the Noise Impact Assessment	This has been included as requested in Table 7-5 of the EIS	Table 7-5
15	NSW EPA	The adopted criteria for M2 Milton Street during the evening period should be 47dB(A) in both Table 7-5 of the EIS and Table 3 of the Noise Impact Assessment as per the NSW Industrial Noise Policy Application. Note 'When the RBL for evening or night-time is higher than the RBL for daytime'. EPA notes that this does not change the outcome of the assessment.	This has been amended as requested within both the EIS and the Noise Impact Assessment.	Section 2.4 added, and Table 3 amended within Appendix F Noise Impact Assessment, Table 7-5 of EIS amended
16	NSW EPA	Section 3.2 of the Noise Impact Assessment discusses sleep disturbance criteria however no assessment of potential sleep disturbance impacts is made in the Noise Impact Assessment or EIS	An assessment of potential sleep disturbance has been added to the Noise Impact Assessment and the EIS.	Section 4.6 of Appendix F Noise Impact Assessment, and Section 7.4.7 of the EIS
17	NSW EPA	Any construction works to be undertaken outside the standard construction hours in Section 2.2 of the Interim Noise Construction Guideline require prior approval.	Amendment made as requested to Noise Impact Assessment and EIS.	Section 4.8 of Appendix F Noise Impact Assessment and Section 7.4.6 of EIS
18	NSW Office of Water	<u>Groundwater</u> Section 7.8.2 of the draft EIS indicates disturbance of the existing capping layer during the construction phase of the Camellia Recycling Centre (CRC) project will expose the contaminated material in both the soil and groundwater (page 107). Table 9-1 (Summary of Mitigation Measures) of the draft EIS notes "during the excavation phase of construction it is expected that shallow groundwater may be encountered" and Section 3.3 (State Legislation) notes that if dewatering is required as part of the construction method, a licence will be required from the Office of Water. The draft EIS indicates a detailed geotechnical assessment will be undertaken as part of the detailed design process (see Section 7.8.1, page 106). While it may not be possible to provide a detailed geotechnical assessment until the detailed design stage because the site is contaminated, it is recommended the EIS provides sufficient detail in relation to groundwater interception and dewatering to assess the potential impacts of the project.	EIS Section 7.7.3 now includes mitigation measures regarding groundwater interception and dewatering. These mitigation measures are highly dependent on the selected detailed design of the facility's foundations, and construction methods required to implement the selected foundations.	Section 7.8.3 and Table 9-1



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19	NSW Office of Water	<u>Groundwater</u> Depending on volumes of water encountered and the duration of pumping, a licence may be required from the Office of Water under Part 5 of the <i>Water Act 1912</i> . The Office of Water can advise on the need for a water licence once information is available on the expected groundwater inflows. The applicant should contact the Office of Water licensing officer at the Parramatta Office in relation to this issue.	Excavation is planned only into fill, and groundwater is towards bottom of fill layer as per Figure 7.5. If excavation plans require digging to layer holding groundwater then Office of Water would be contacted to determine need for licence. The EIS has been amended to reflect this. EIS amended as requested.	Section 3.3 State Legislation (<i>Water Management Act 2000</i>) and Section 7.7.2 Construction Impacts (Groundwater)
20	NSW Office of Water	<u>Groundwater</u> The Office of Water recommended the EIS identify any existing surface water and groundwater licences on the subject land. It is noted the Site-Specific Environmental Management Plan at Appendix D refers to a number of monitoring wells and shallow piezometers which have previously been installed (see Sections 1.1, 2.1, 2.2.2 and 2.3).		Section 3.3 State Legislation (<i>Water Act 1912</i>)
21	NSW Office of Water	<u>Surface water stormwater system</u> The RAP indicates consideration has been given to replacing the existing surface water stormwater system (rather than maintaining and repairing the existing old piping) to prevent the infiltration of contaminated groundwater into the system and thereby provide a conduit for contaminated water to enter the Parramatta River (see section 5.2.5, page 36). The RAP notes it would be opportune to install a new section of this piping in the permeable reactive barrier during construction to tie in with future stormwater piping. Section 8.2.2 of the RAP implies the stormwater system will continue to be inspected and maintained rather than be replaced and the draft EIS refers to the upgrading of the stormwater system as part of the site remediation project and also the SSD proposal (see Section 7.7.4, pages 100-101). It is not clear if the 'upgrade' of the stormwater pipe involves the relining or the replacement of the stormwater pipes. It is recommended the EIS clarifies this.	EIS revised to clarify that until CRC is approved, the stormwater system will be under a program of inspection and maintenance. When the CRC is approved the majority of the stormwater system would be upgraded. In addition, the replacement of a small portion of stormwater pipe and the outfall to the Parramatta River form part of the remediation works outlined in the RAP. This initial minor upgrade and the remediation works form part of a separate local development application to Parramatta City Council.	Section 7.8.4 Operational Impacts (<i>Stormwater</i>)



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22	NSW Office of Water	<u>Riparian Land</u> Section 3.3 (State Legislation) of the draft EIS notes the proposal is not considered to be a controlled activity because the proposal is to take place at least 40m away from the Parramatta River. To avoid confusion, it is recommended this section clarifies that the CRC project is a State Significant Development (SSD) and in accordance with S89J(1) of the <i>Environmental Planning and Assessment Act</i> , an activity approval under Section 91 of the <i>Water Management Act 2000</i> does not apply to SSD.	EIS amended as requested.	Section 3.3 State Legislation (<i>Water Management Act 2000</i>)
23	NSW Office of Water	<u>Riparian Land</u> Section 5.3 of the draft EIS notes a small 15m wide by 80m long grass strip of land is present at the northern boundary of the site (page 49). The grassed area is located between the existing concrete car park and the Clyde wetlands which are located directly to the north of the site along the foreshore of the Parramatta River (see Section 8.3.1, page 141). Sections 3.2.1 and 8.3.2 indicate the CRC will be constructed at least 40m back from the Parramatta River foreshore area and the proposal would not impact on the listed wetlands (pages 26 and 143). The Office of Water in the DGR submission recommended the EIS address the issue of the cap in relation to the rehabilitation of riparian land and provide details on whether it is possible (or not) to rehabilitate riparian land.	Development will not occur within this grassed area for this proposal. This proposal will occur within the confines of the boundary fence. The development that has the potential to impact the grassed area is site rehabilitation works, which are the subject of a separate development application to Parramatta City Council. The issue of the grassed area cap in relation to the rehabilitation of riparian land, and details on whether it is possible to rehabilitate riparian land, are addressed within this separate development application. CH2M HILL staff have discussed this separate development application with Janne Grose and Mohammed Ismael of NOW.	-



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24	NSW Office of Water	Riparian Land Section 6.5.2 of the draft EIS clarifies that the existing car park at the northern end of the site is to remain as part of the proposal. It also indicates the entire site would be capped (page 66). Section 7.7.4 notes all works within the 40m foreshore zone will be undertaken as part of the remediation works which is separate to the SSD proposal. It would appear all of the existing grassed area is to be capped as part of the site remediation work (and will not be rehabilitated with native riparian vegetation. It is recommended the EIS clarifies this.	Regarding the NOW comment <i>It also indicates the entire site would be capped (page 66)</i> – The proposal intends to leave the existing site asphalt and cement cap in place, except where excavation for facility foundations is required. Regarding the cap of the grassed area at the north end of the property, please see Comment 23.	
25	Veolia amendment	The initial EIS draft submitted to DPI for the adequacy assessment indicated that the three liquid waste tanks at the site entry would be demolished. These liquid waste tanks are now to remain on the Veolia property and would not form part of the proposed CRC development.	Minor revisions to Section 6 and Figure 6.1	Section 6, Figure 6.1
26	Veolia amendment	The entrances and exit to the receivals area of the CRC building have been modified to keep both at the southwest corner of the building. In addition, trucks will navigate the northern section of the CRC by travelling both inside and outside the building. The Noise Impact Assessment was revised to ensure site layout complies with noise management requirements.	Minor amendments to Figure 6.1 Site Layout, minor amendments to the Noise Impact Assessment	Figure 6.1, Section 7.4, and Appendix F.

