



DOC18/936088

Mr Kelly McNicol
Team Leader – Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

18 December 2018

Dear Mr McNicol

SSD 5300 MOD 2 – 50 Wyllie Road, Kembla Grange – EPA Comments

I am writing to you about the Department of Planning and Environment's (DPE) request for comments for the Modification Application for the Kembla Grange Resource Recovery Facility, SSD 5300 MOD 2 located at 50 Wyllie Road, Kembla Grange (the Premises). The Environment Protection Authority (EPA) has reviewed the application and supporting documentation and provides the following comments and proposed consent conditions:

Condition A6

The EPA recommends that the wording of this condition be updated from "calendar year" to "in any 12 month period". This will enable both EPA and DPE to determine compliance with this condition at any point in time rather than at the end of a defined period such as the proposed reporting period.

Condition C11

The EPA does not have any objections to this condition being aligned with the environment protection licence reporting period of 15 March to 14 March each year.

Noise

The EPA has not had sufficient time to undertake a thorough review of the noise impact assessment, accordingly we have recommended a condition that requires noise monitoring to be conducted following commissioning of the proposed modifications to assess compliance with noise limits.

Leachate Management and Stormwater Management

Given the proposed changes to site operations, which include an outdoor picking station, we recommend that the applicant be required to assess the adequacy and suitability of the current leachate and stormwater management system.

We note that the drawing titled *Proposed Industrial Development, Lot 10 DP 878167, Wyllie Road, Kembla Grange, Site Plan, Drawing No. C10* prepared by KFW and dated 7 November 2012 shows a stormwater pit located in close proximity to the picking station where waste will potentially be stored.

Approved drawings

The EPA has identified inconsistencies in the naming of different processing areas and infrastructure on the updated drawings (e.g. the three onsite ponds are not consistently named in all drawings). The EPA recommends that the applicant reviews and updates all drawings intended to form part of the approved documentation to ensure they are consistent and to avoid ambiguity.

Licence Variation

The EPA notes that the current consent permits composting to occur in a fully enclosed building under negative pressure. However, we note that the applicant does not intend to compost at the Premises.

If approved, this modification will permit the proposed composting building to be used for another purpose. As such, the EPA will work with the applicant to ensure that the Licence reflects the approved operations at the Premises.

Proposed Consent Conditions

Condition A6

1. The Applicant must not receive or process more than 230,000 tonnes of waste at the Premises in any 12 month period, subject to Condition A8.

Noise

2. The applicant must carry out noise monitoring within 3 months of commissioning the indoor processing plant at locations identified in Condition B20 of the Consent.
3. If the noise limits outlined in Condition B20 of the approval are exceeded, the applicant must prepare a report with recommendations for proposed noise mitigation measures.
4. The noise monitoring report and any recommendations must be submitted to DPE the EPA within one month of the monitoring being conducted.

Leachate and Stormwater Management

5. The applicant must provide an updated leachate and stormwater management plan and associated diagrams to DPE and the EPA.
6. All segregated garden waste must be stored and processed in the area labelled "Green waste shredding area" on the drawing titled *Proposed Industrial Development, Lot 10 DP 878167, Wyllie Road, Kembla Grange, Site Plan, Drawing No. C10* prepared by KFW and dated 7 November 2012.
7. Waste must not be stored or stockpiled on any stormwater pit at the Premises.

If you have any questions in relation to this matter, please contact Tracey McAndrew on (02) 4224 4124.

Yours sincerely



MEGAN WHELAN
Unit Head Waste Compliance
Environment Protection Authority