

APPENDIX 2

DIRECTOR-GENERALS REQUIREMENTS





Contact: Emma Barnet
Phone: (02) 9228 6550
Fax: (02) 9228 6466
Email: emma.barnet@planning.nsw.gov.au

Mr Will Dwyer
Goodman Property Service (Aust) Pty Ltd
Level 17, 60 Castlereagh Street
Sydney NSW 2000

Our Ref: 12/20565

Dear Mr Dwyer

**State Significant Development - Director-General's Requirements
Mainfreight Dangerous Goods Storage Facility, Prestons (SSD - 5746)**

I have attached a copy of the Director-General's environmental assessment requirements (DGRs) for the preparation of an Environmental Impact Statement for the proposed Mainfreight Dangerous Goods Storage Facility.

These requirements are based on the information you have provided to date and have been prepared in consultation with the relevant government agencies and Liverpool City Council. Their comments, which you should address appropriately in preparing the EIS, are attached (see Attachment 2). Please note that the Department may alter these requirements at any time, and that you must consult further with the Department if you do not lodge a development application and EIS for the development within two years of the date of issue of these DGRs. The Department will review the EIS for the development carefully before putting it on public exhibition, and will require you to submit an amended EIS if it does not adequately address the DGRs.

I wish to emphasise the importance of effective and genuine community consultation and the need for proposals to proactively respond to the community's concerns. Accordingly a comprehensive, detailed and genuine community consultation and engagement process must be undertaken during the preparation of the EIS. This process must ensure that the community is both informed of the proposal and is actively engaged in issues of concern to them. Sufficient information must be provided to the community so that it has a good understanding of what is being proposed and of the potential impacts.

The Department prefers operations like the Mainfreight Dangerous Goods Storage Facility to operate under a single, modern planning approval. Consequently, the Department encourages you to develop the project with this preference in mind, and to consider surrendering any existing planning approvals for the current warehouse facility should the proposal be approved.

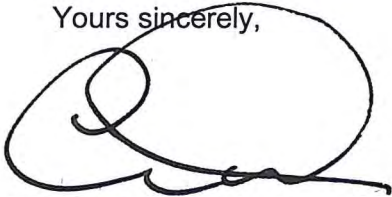
Your proposal may require a separate approval under Commonwealth *Environment Protection Biodiversity Conservation Act 1999* (EPBC Act). If an EPBC Act approval is required, I would appreciate it if you would advise the Department accordingly, as the Commonwealth approval process may be integrated into the NSW approval process, and supplementary DGR's may need to be issued.

I would appreciate it if you would contact the Department at least two weeks before you propose to submit the development application and EIS for your development. This will enable the Department to determine the:

- applicable fee (see Division 1AA, Part 15 of the *Environmental Planning and Assessment Regulation 2000*);
- consultation and public exhibition arrangements; and
- number of copies (hard-copy and CD-ROM) of the EIS required for review.

If you have any enquiries about these requirements, please contact Emma Barnett on the above details.

Yours sincerely,



1. 2. 13

Chris Wilson
Executive Director
Major Projects Assessment
As the Director-General's nominee

Director General's Environmental Assessment Requirements

Section 78A(8A) of the *Environmental Planning and Assessment Act 1979*

State Significant Development

Application Number	SSD - 5746
Development	<p>The expansion of the existing Mainfreight Centre including the use of the facility for the storage and handling of around 500,000kg of materials classified as dangerous goods, including aerosol cans, acidic solids, acidic liquids and alkali liquids.</p> <p>The proposal includes the construction of around 13,260m² of new warehouse space, sheds and hardstand area.</p>
Location	30-50 Yarrowa Street, Prestons (Lots 101 & 102 DP 1117691 and Lot 2 DP 28729)
Applicant	Goodman Property Services (Australia) Pty Ltd
Date of Issue	February 2013
General Requirements	<p>The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i>.</p> <p>In addition, the EIS must include a:</p> <ul style="list-style-type: none"> • clear description of the existing operations carried out on the site and how the site operates lawfully under the <i>Environmental Planning and Assessment Act 1979</i> including any reliance on use rights and/or planning approvals; • detailed description of the development, including: <ul style="list-style-type: none"> – need for the proposed development; – justification for the proposed development; – likely staging of the development; – the nature and destination of materials to be received and distributed; and – plans of all proposed building works. • consideration of all relevant environmental planning instruments and policy documents, including identification and justification of any inconsistencies with these instruments and documents (e.g. the <i>Work Health and Safety Regulation 2011</i>); • risk assessment of the potential environmental impacts of the development, identifying the key issues for further assessment; • detailed assessment of the key issues specified below, and any other significant issues identified in this risk assessment, which includes: <ul style="list-style-type: none"> – a description of the existing environment, <u>using sufficient baseline data</u>; – an assessment of the potential impacts of all stages of the development, including any cumulative impacts, taking into consideration relevant guidelines, policies, plans and statutes; and – a description of the measures that would be implemented to avoid, minimise and if necessary, offset the potential impacts of the development, including proposals for adaptive management and/or contingency plans to manage any significant risks to the environment; • a consolidated summary of all the proposed environmental management and monitoring measures, highlighting commitments included in the EIS. <p>The EIS must also be accompanied by a report from a qualified quantity</p>

	<p>surveyor providing:</p> <ul style="list-style-type: none"> • a detailed calculation of the capital investment value (as defined in clause 3 of the <i>Environmental Planning and Assessment Regulation 2000</i>) of the proposed development, including details of all assumptions and components from which the CIV calculation is derived; • an estimate of the jobs that will be created during the construction and operational phases of the proposed development; and • certification that the information provided is accurate at the date of preparation.
<p>Key Issues</p>	<p>The EIS must address the following specific issues:</p> <ul style="list-style-type: none"> • Hazards and Risks – including <ul style="list-style-type: none"> – an assessment of the hazards and risks associated with the proposal and the existing operations on site (and the potential for off site impacts) including details of hazardous materials used or stored on the premises during operation; – A Preliminary Hazards Analysis (PHA) must be prepared in accordance with the Department's <i>Hazardous Industry Planning Advisory Paper No. 6 Hazard analysis and Multi-level Risk Assessment</i>. The PHA should: <ul style="list-style-type: none"> ▪ consider the risks from the proposed development (including loading/unloading and transport activities); and ▪ demonstrate that the proposed development would comply with the criteria set out in <i>Hazardous Industry Planning Advisory Paper No 4 Risk Criteria for Land Use Safety Planning</i>. – technical information on the environmental protection equipment to be installed on the premises such as air, water and noise controls, spill cleanup equipment and fire management and containment measures; – an assessment of any potential bushfire risks; and – consideration of any nearby Transgrid easements. • Transport and Access – including: <ul style="list-style-type: none"> – accurate predictions of the traffic generated by the development; – a detailed assessment of the potential impacts of the development on the capacity, efficiency and safety of the road network including the cumulative traffic generated by all existing and the proposed development; – details of any upgrades to road infrastructure that would be required due to the development; and – site accesses, internal roads and vehicular parking required as a result of the development. • Air Quality – including: <ul style="list-style-type: none"> – a quantitative assessment of the potential air quality impacts during construction and operation of the proposed development (including odour, dust, fugitive and greenhouse gas emissions). This assessment shall also consider potential impacts of the proposal on any nearby sensitive receivers; and – details of the proposed management and monitoring measures. • Noise and Vibration – including: <ul style="list-style-type: none"> – a noise impact assessment, including an assessment of predicted noise impacts and road traffic noise during both construction and operation; – the potential impacts of the proposal on any nearby sensitive receivers; – consideration of vibration impacts from excavation works; and – details of the proposed noise mitigation, monitoring and management measures. • Soil and Water – including a detailed assessment of potential soil, surface and groundwater impacts, particularly on nearby sensitive water sources/bodies; • Waste - including: <ul style="list-style-type: none"> – the measures that would be implemented to ensure that the proposal

	<p>is consistent with the aims, objectives, and guidance in the <i>DECCW's Waste Classification Guidelines</i>; and</p> <ul style="list-style-type: none"> - details of the quantities and classification of waste including chemicals and hazardous materials that will be generated, disposed of, handled and managed on site and stockpiled. • Visual and Design – including: <ul style="list-style-type: none"> - details of building design and how the facility would be built and fitted-out to handle the proposed storage of dangerous goods (i.e. bunding and tanker loading/unloading areas); and - any potential visual impacts on surrounding receivers from public areas. • Heritage.
Plans and Documents	The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the <i>Environmental Planning and Assessment Regulation 2000</i> . These documents should be included as part of the EIS rather than as separate documents.
Consultation	<p>During the preparation of the Environmental Impact Statement, you should consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups or affected landowners.</p> <p>In particular you must consult with the:</p> <ul style="list-style-type: none"> • Environmental Protection Authority; • Office of Environment and Heritage; • NSW Office of Water; • Transport for NSW (including NSW Roads and Maritime Service); • NSW Fire Brigades; • NSW WorkCover; • Transgrid; • Liverpool City Council; and • the local community and stakeholders. <p>The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p>
Further consultation after 2 years	If you do not lodge an EIS for the development within 2 years of the issue date of these DGRs, you must consult with the Director General in relation to the requirements for lodgement.
References	The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans as identified. While not exhaustive, the following attachment contains a list of some of the guidelines, policies, and plans that may be relevant to the environmental assessment of this project.

ATTACHMENT 1

Technical and Policy Guidelines

The following guidelines may assist in the preparation of the Environmental Impact Statement. This list is not exhaustive and not all of these guidelines may be relevant to your proposal.

Many of these documents can be found on the following websites:

<http://www.planning.nsw.gov.au>

<http://www.bookshop.nsw.gov.au>

<http://www.publications.gov.au>

Policies, Guidelines and Plans

Aspect	Policy /Methodology
Hazard and Risk	
	AS/NZS 4360:2004 Risk Management
	HB 203:2006 Environmental Risk Management – Principals and Process
	State Environmental Planning Policy No 33– Hazardous and Offensive Development (SEPP 33)
	Planning Advisory Paper No. 6 – Guidelines for Hazardous Analysis (DUAP)
	Planning Advisory Paper No. 4 – Risk Criteria for Land Use Safety Planning (DUAP)
	Newcastle and Kooragang Island Area Risk Assessment Study, 1992
Soil and Water	
	Acid Sulfate Soil Manual (ASSMAC)
<i>Soil</i>	Australian and New Zealand Guidelines for the Assessment and Management of Contaminated Sites (ANZECC & NHMRC)
	National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPC)
	State Environmental Planning Policy No. 55 – Remediation of Land
	Managing Land Contamination - Planning Guidelines SEPP 55 – Remediation of Land (DUAP and EPA)
	Rural Land Capability Mapping
	Agricultural Land Classification
<i>Surface Water</i>	National Water Quality Management Strategy: Australian Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ)
	National Water Quality Management Strategy: Australian Guidelines for Water Quality Monitoring and Reporting (ANZECC/ARMCANZ)
	National Water Quality Management Strategy: Guidelines for Sewerage Systems - Effluent Management (ARMCANZ/ANZECC)
	National Water Quality Management Strategy: Guidelines for Sewerage Systems - Use of Reclaimed Water (ARMCANZ/ANZECC)
	National Water Quality Management Strategy - Guidelines For Water Recycling: Managing Health And Environmental Risks (Phase1) (EPHC, NRMMC & AHMC)
	National Water Quality Management Strategy - Guidelines For Water Recycling: Managing Health And Environmental Risks (Phase1) (EPHC, NRMMC & AHMC)
	Managing Urban Stormwater: Council Handbook. Draft (EPA)
	Managing Urban Stormwater: Treatment Techniques (EPA)
	Managing Urban Stormwater: Source Control. Draft (EPA)

	Managing Urban Stormwater: Soils & Construction (Landcom)
	Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (DEC)
	Using the ANZECC Guideline and Water Quality Objectives in NSW (DEC)
	Floodplain Risk Management Guideline: Practical Consideration of Climate Change (DECC)
<i>Groundwater</i>	National Water Quality Management Strategy Guidelines for Groundwater Protection in Australia (ARMCANZ/ANZECC)
	NSW State Groundwater Policy Framework Document (DLWC)
	NSW State Groundwater Quality Protection Policy (DLWC)
	NSW State Groundwater Quantity Management Policy (DLWC) Draft
	The NSW State Groundwater Dependent Ecosystem Policy (DLWC) Guidelines for the Assessment and Management of Groundwater Contamination (DECC) Draft
Air Quality	
	Protection of the Environment Operations (Clean Air) Regulations 2010
	Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW (DEC)
	Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DEC)
Odour	
	Technical Framework: Assessment and Management of Odour from Stationary Sources in NSW (DEC)
	Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (DEC)
Greenhouse Gas	
	National Greenhouse Accounts (NGA) Factors
	Guidelines for Energy Savings Action Plans (DEUS)
Noise	
	NSW Industrial Noise Policy (DECC)
	NSW Road Noise Policy (OEH)
	Environmental Noise Control Manual (DECC)
Waste	
	Waste Avoidance and Resource Recovery Strategy (Resource NSW)
	Waste Classification Guidelines (DECC)
	Protection of the Environment Operations (Waste) Regulations 2005
Transport	
	Guide to Traffic Generating Development (RTA)
	Road Design Guide (RTA)
	Road and Related Facilities, EIS Guideline (DoPI)
Heritage	
	Draft Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation (DEC)
<i>Non-Indigenous</i>	NSW Heritage Manual (NSW Heritage Office & DUAP)
	The Burra Charter (The Australia ICOMOS charter for places of cultural significance)

ATTACHMENT 2
Government Authority Responses to Request for Key Issues

Your Reference: SSD 5746
Our Reference: SYD12/01477
Contact: Stella Qu
Telephone: 8849 2520



Transport
Roads & Maritime
Services

Environmental Planning Officer
Major Projects Assessment
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Emma Barnet

REQUEST FOR THE DIRECTOR GENERAL'S REQUIREMENTS FOR EXPANSION OF EXISTING MAINFRIIGHT FACILITY (SSD 5746)

Dear Ms. Barnet,

I refer to your letter of 14 December 2012 (SSD 5746) requesting Roads and Maritime Services (RMS) to provide details of key issues and assessment requirements regarding the proposed expansion of existing mainfreight facility under the Environmental Planning and Assessment Act 1979.

RMS would like the following issues to be included in the transport and traffic impact assessment of the proposed development:

1. Daily and peak traffic movements likely to be generated by the proposed development including the impact on nearby intersections and the need / associated funding for upgrading or road improvement works (if required).
2. Details of the proposed accesses and the parking provisions associated with the proposed development including compliance with the requirements of the relevant Australian Standards (ie: turn paths, sight distance requirements, aisle widths, etc).
3. Proposed number of car parking spaces and compliance with the appropriate parking codes.
4. Details of service vehicle movements (including vehicle type and likely arrival and departure times).
5. The hazardous materials shall be transported using the designated dangerous goods routes. In this regard, a travel plan or map should be provided to DP&I which illustrates the routes for transportation of the dangerous goods to the subject site.

Roads and Maritime Services

Further enquiries on this matter can be directed to the nominated Land Use and Transport Planner, Stella Qu on phone 8849 2219 or facsimile (02) 8849 2520.

Yours sincerely



James Hall
Senior Land Use Planner
Transport Planning, Sydney Region
30 January 2013



Your Reference Mainfreight Prestons SSD 5746
Our reference : DOC12/52603
Contact : Nicolas Israel, 9995 6821

Mr Chris Ritchie
Manager – Industry
Mining and Industry Projects
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Mr Ritchie

I refer to your request for the Environment Protection Authority's (EPA's) requirements for the Environmental Impact Statement (EIS) for the proposed expansion of the existing Mainfreight warehouse and distribution facility at 30-50 Yarrowa Street, Prestons received by the EPA on 17 December 2012.

The EPA has considered the details of the proposal as provided by the Department of Planning and Infrastructure (DoPI) and has identified the information it requires to assess the project in Attachment A. In summary, the EPA's key information requirements for the EIS are:

1. potential air quality impacts on neighbouring properties, taking into account cumulative air quality impacts of similar activities locally and regionally;
2. potential impacts of noise over the life of the development, especially during evening and night time periods. Of particular concern is the cumulative noise impacts on sensitive receivers from existing and proposed activities;
3. water pollution; and
4. waste generation, storage and management on site.

Notwithstanding the above and provided that the proposal is approved by the determining authority, Mainfreight Distribution Pty Limited (the proponent) will be required to hold an Environment Protection Licence (EPL) with the EPA under the *Protection of the Environment Operations Act 1979* (POEO Act). The proponent will need to make a separate application to the EPA to obtain this EPL. General information on licence requirements can be obtained from Environment Line on 131 555 or on the EPA's website www.environment.nsw.gov.au/licensing

To assist the EPA in assessing the EIS, it is requested that the EIS follow the format of DoPI EIS guidelines and addresses the EPA's specific requirements outlined in Attachment A. If the necessary information is not adequately provided in the EIS then delays in the development and licence application processes may occur. In carrying out the assessment, the proponent should refer to the relevant guidelines as listed in Attachment B and any relevant industry codes of practice and best practice management guidelines.



ENVIRONMENT PROTECTION AUTHORITY

The EPA requests that the proponent provides one hard copy and one electronic copy of the EIS when lodging its application to the EPA. These documents should be lodged at the EPA's office, PO Box 668, PARRAMATTA NSW 2124.

Should you wish to discuss the matter further, please contact Mr Nicolas Israel on (02) 9995 6821.

Yours sincerely

 30/1/13

GREG SHEEHY
Manager Sydney Industry
Environment Protection Authority



Attachment A

EPA's Recommended Environmental Assessment Requirements (EARs)

TABLE OF CONTENTS

- 1 Environmental impacts of the project**
- 2 Licensing requirements**
- 3 Air issues**
 - 3.1 Air quality**
- 4 Noise and vibration**
- 5 Waste, chemicals and hazardous materials/radiation**
 - 5.1 General waste – any proposal**
 - 5.2 Chemicals subject to Chemical Control Orders**
- 6 Water and soils**
 - 6.1 Acid sulfate soils**
 - 6.2 Water**

1 Environmental impacts of the project

1. Impacts related to the following environmental issues need to be assessed, quantified and reported on:

- Air Issues
 - air quality
 - greenhouse gas
- Noise and vibration
- Waste including hazardous materials and radiation
 - Waste EARs for waste facilities
 - General waste – any proposal
 - Chemicals subject to Chemical Control Orders
 - Hazardous materials and radiation
- Water and Soils
 - Acid sulfate soils
 - Contaminated sites
 - Soils - general
 - Water quality

2. Environmental Assessments (EAs) should address the specific requirements outlined under each heading below and assess impacts in accordance with the relevant guidelines mentioned. A full list of guidelines is included at **Attachment B**.

2 Licensing requirements

1. On the basis of the information submitted to date, it appears that the proposal is a scheduled activity (chemical storage) under the *Protection of the Environment Operations Act 1997* (POEO Act) and will therefore require an Environment Protection Licence (EPL) if approval is granted. The EIS should address the requirements of Section 45 of the POEO Act determining the extent of each impact and providing sufficient information to enable the EPA to determine appropriate limits for the EPL.
2. Should project approval be granted, the proponent will need to make a separate application to the EPA for an EPL to ensure that the proposed activities are reflected in that EPL prior to undertaking any on site works. Additional information is available through the *EPA Guide to Licensing* document: (www.environment.nsw.gov.au/licensing/licenceguide.htm).

SPECIFIC ISSUES

3 Air issues

3.1 Air quality

The EIS should include a detailed air quality impact assessment (AQIA). The AQIA should:

1. Assess the risk associated with potential discharges of fugitive and point source emissions for all stages of the proposal. Assessment of risk relates to environmental harm, risk to human health and amenity.
2. Justify the level of assessment undertaken on the basis of risk factors, including but not limited to:
 - a) proposal location;
 - b) characteristics of the receiving environment; and
 - c) type and quantity of pollutants emitted.
3. Describe the receiving environment in detail. The proposal must be contextualised within the receiving environment (local, regional and inter-regional as appropriate). The description must include but need not be limited to:
 - a) meteorology and climate;
 - b) topography;
 - c) surrounding land-use; receptors; and
 - d) ambient air quality.
4. Include a detailed description of the proposal. All processes that could result in air emissions must be identified and described. Sufficient detail to accurately communicate the characteristics and quantity of all emissions must be provided.
5. Include a consideration of 'worst case' emission scenarios and impacts at proposed emission limits.
6. Account for cumulative impacts associated with existing emission sources as well as any currently approved developments linked to the receiving environment.
7. Include air dispersion modelling where there is a risk of adverse air quality impacts, or where there is sufficient uncertainty to warrant a rigorous numerical impact assessment. Air dispersion modelling must be conducted in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2005) <http://www.environment.nsw.gov.au/resources/air/ammodelling05361.pdf>.
8. Demonstrate the proposal's ability to comply with the relevant regulatory framework, specifically the *Protection of the Environment Operations (POEO) Act (1997)* and the *POEO (Clean Air) Regulation (2002)*.
9. Provide an assessment of the project in terms of the priorities and targets adopted under the NSW State Plan 2010 and its implementation plan Action for Air.

10. Detail emission control techniques/practices that will be employed by the proposal.

4 Noise and vibration

1. In relation to noise, the following matters should be addressed (where relevant) as part of the Environmental Assessment.

General

2. Construction noise associated with the proposed development should be assessed using the *Interim Construction Noise Guideline* (DECC, 2009).

<http://www.environment.nsw.gov.au/noise/constructnoise.htm>

3. Vibration from all activities (including construction and operation) to be undertaken on the premises should be assessed using the guidelines contained in the *Assessing Vibration: a technical guideline* (DEC, 2006).

<http://www.environment.nsw.gov.au/noise/vibrationguide.htm>

4. If blasting is required for any reasons during the construction or operational stage of the proposed development, blast impacts should be demonstrated to be capable of complying with the guidelines contained in *Australian and New Zealand Environment Council – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration* (ANZEC, 1990).

<http://www.environment.nsw.gov.au/noise/blasting.htm>

Industry

5. Operational noise from all industrial activities (including private haul roads and private railway lines) to be undertaken on the premises should be assessed using the guidelines contained in the *NSW Industrial Noise Policy* (EPA, 2000) and *Industrial Noise Policy Application Notes*.

<http://www.environment.nsw.gov.au/noise/industrial.htm>

Road

6. Noise on public roads from increased road traffic generated by land use developments should be assessed using the guidelines contained in the *Environmental Criteria for Road Traffic Noise* (EPA, 1999).

<http://www.environment.nsw.gov.au/noise/traffic.htm>

7. Noise from new or upgraded public roads should be assessed using the *Environmental Criteria for Road Traffic Noise* (EPA, 1999).

<http://www.environment.nsw.gov.au/noise/traffic.htm>

5 Waste, chemicals and hazardous materials/radiation

5.1 General waste – any proposal

The EIS should:

1. Include a detailed plan for in-situ classification of waste material, including the sampling locations and sampling regime that will be employed to classify the waste, particularly with regards to the identification of contamination hotspots.
2. Identify, characterise and classify all waste that will be generated onsite through excavation, demolition or construction activities, including proposed quantities of the waste.
Note: All waste must be classified in accordance with the *EPA's Waste Classification Guidelines*.
3. Identify, characterise and classify all waste that is proposed to be disposed of to an offsite location, including proposed quantities of the waste and the disposal locations for the waste. This includes waste that is intended for re-use or recycling.
Note: All waste must be classified in accordance with the *EPA's Classification Guidelines*.
4. Include a commitment to retaining all sampling and classification results for the life of the project to demonstrate compliance with the *EPA's Waste Classification Guidelines*.
5. Provide details of how waste will be handled and managed onsite to minimise pollution, including:
 - a) Stockpile location and management
 - Labelling of stockpiles for identification, ensuring that all waste is clearly identified and stockpiled separately from other types of material (especially the separation of any contaminated and non-contaminated waste).
 - Proposed height limits for all waste to reduce the potential for dust and odour.
 - Procedures for minimising the movement of waste around the site and double handling.
 - Measures to minimise leaching from stockpiles into the surrounding environment, such as sediment fencing, geofabric liners etc.
 - a) Erosion, sediment and leachate control including measures to be implemented to minimise erosion, leachate and sediment mobilisation at the site during works. The EIS should show the location of each measure to be implemented. The Proponent should consider measures such as:
 - Sediment traps
 - Diversion banks

- Sediment fences
- Bunds (earth, hay, mulch)
- Geofabric liners
- Other control measures as appropriate

The Proponent should also provide details of:

- how leachate from stockpiled waste material will be kept separate from stormwater runoff;
 - treatment of leachate through a wastewater treatment plant (if applicable); and
 - any proposed transport and disposal of leachate off-site.
6. Provide details of how the waste will be handled and managed during transport to a lawful facility. If the waste possesses hazardous characteristics, the Proponent must provide details of how the waste will be treated or immobilised to render it suitable for transport and disposal.
 7. Include details of all procedures and protocols to be implemented to ensure that any waste leaving the site is transported and disposed of lawfully and does not pose a risk to human health or the environment.
 8. Include a statement demonstrating that the Proponent is aware of EPA's requirements with respect to notification and tracking of waste.
 9. Include a statement demonstrating that the Proponent is aware of the relevant legislative requirements for disposal of the waste, including any relevant Resource Recovery Exemptions, as gazetted by EPA from time to time.
 10. Outline contingency plans for any event that affects operations at the site that may result in environmental harm, including: excessive stockpiling of waste, volume of leachate generated exceeds the storage capacity available on-site etc.

5.2 Chemicals subject to Chemical Control Orders

1. The EIS must demonstrate how the Proponent will manage all materials and wastes containing scheduled chemical waste, dioxin and/or polychlorinated biphenyls (PCBs) in accordance with the applicable Chemical Control Order, National Management Plan or in accordance with a licence under the EHC Act.
2. Where a project involves any processing or treatment of scheduled chemicals, the proponent must provide the EPA with sufficient and appropriate documentation for a technology assessment to be undertaken by the EPA, in accordance with the following:
 - 'National Protocol - Approval/Licensing of Trials of Technologies for the Treatment/Disposal of Schedule X Wastes - July 1994'; and



ENVIRONMENT PROTECTION AUTHORITY

- 'National Protocol for Approval/Licensing of Commercial Scale Facilities for the Treatment/Disposal of Schedule X Wastes - July 1994'.

6 Water and soils

6.1 Acid sulfate soils

1. The potential impacts of the development on acid sulfate soils must be assessed in accordance with the relevant guidelines in the *Acid Sulfate Soils Manual* (Stone *et al.* 1998) and the *Acid Sulfate Soils Laboratory Methods Guidelines* (Ahern *et al.* 2004).
2. Describe mitigation and management options that will be used to prevent, control, abate or minimise potential impacts from the disturbance of acid sulfate soils associated with the project and to reduce risks to human health and prevent the degradation of the environment. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.

6.2 Water

Describe Proposal

1. Describe the proposal including position of any intakes and discharges, volumes, water quality and frequency of all water discharges.
2. Demonstrate that all practical options to avoid discharge have been implemented and environmental impact minimised where discharge is necessary.
3. Where relevant include a water balance for the development including water requirements (quantity, quality and source(s)) and proposed storm and wastewater disposal, including type, volumes, proposed treatment and management methods and re-use options.

Background Conditions

4. Describe existing surface and groundwater quality. An assessment needs to be undertaken for any water resource likely to be affected by the proposal.
5. State the Water Quality Objectives for the receiving waters relevant to the proposal. These refer to the community's agreed environmental values and human uses endorsed by the NSW Government as goals for ambient waters (<http://www.environment.nsw.gov.au/ieo/index.htm>). Where groundwater may be impacted the assessment should identify appropriate groundwater environmental values.
6. State the indicators and associated trigger values or criteria for the identified environmental values. This information should be sourced from the ANZECC (2000) Guidelines for Fresh and Marine Water Quality (http://www.mincos.gov.au/publications/australian_and_new_zealand_guidelines_for_fresh_and_marine_water_quality).
7. State any locally specific objectives, criteria or targets which have been endorsed by the NSW Government.



Impact Assessment

8. Describe the nature and degree of impact that any proposed discharges will have on the receiving environment.
9. Assess impacts against the relevant ambient water quality outcomes. Demonstrate how the proposal will be designed and operated to:
 - o protect the Water Quality Objectives for receiving waters where they are currently being achieved; and
 - o contribute towards achievement of the Water Quality Objectives over time where they are not currently being achieved.
10. Where a discharge is proposed that includes a mixing zone, the proposal should demonstrate how wastewater discharged to waterways will ensure the ANZECC (2000) water quality criteria for relevant chemical and non-chemical parameters are met at the edge of the initial mixing zone of the discharge, and that any impacts in the initial mixing zone are demonstrated to be reversible.
11. Assess impacts on groundwater and groundwater dependent ecosystems.
12. Describe how stormwater will be managed both during and after construction.

Monitoring

13. Describe how predicted impacts will be monitored and assessed over time.

Attachment B – Guidance Material

Title	Web address
<u>Relevant Legislation</u>	
<i>Contaminated Land Management Act 1997</i>	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+140+1997+cd+0+N
<i>Environmentally Hazardous Chemicals Act 1985</i>	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+14+1985+cd+0+N
<i>Environmental Planning and Assessment Act 1979</i>	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+203+1979+cd+0+N
<i>Protection of the Environment Operations Act 1997</i>	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+156+1997+cd+0+N
<u>Licensing</u>	
EPA Guide to Licensing	www.environment.nsw.gov.au/licensing/licenceguide.htm
<u>Air Issues</u>	
Air Quality	
Approved methods for modelling and assessment of air pollutants in NSW (2005)	http://www.environment.nsw.gov.au/resources/air/ammodelling05361.pdf
<i>POEO (Clean Air) Regulation 2002</i>	http://www.legislation.nsw.gov.au/maintop/view/inforce/subordleg+642+2002+cd+0+N
<u>Noise and Vibration</u>	
Interim Construction Noise Guideline (DECC, 2009)	http://www.environment.nsw.gov.au/noise/constructnoise.htm
Assessing Vibration: a technical guideline (DEC, 2006)	http://www.environment.nsw.gov.au/noise/vibrationguide.htm
Australian and New Zealand Environment Council – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration (ANZEC, 1990)	http://www.environment.nsw.gov.au/noise/blasting.htm
Industrial Noise Policy Application Notes	http://www.environment.nsw.gov.au/noise/traffic.htm
Environmental Criteria for Road Traffic Noise (EPA, 1999)	http://www.environment.nsw.gov.au/noise/traffic.htm
<u>Waste, Chemicals and Hazardous Materials and Radiation</u>	
Waste	
Environmental Guidelines: Solid Waste Landfills (EPA, 1996)	http://www.environment.nsw.gov.au/resources/waste/envguidlns/solidlandfill.pdf

Draft Environmental Guidelines - Industrial Waste Landfilling (April 1998)	http://www.environment.nsw.gov.au/resources/waste/envguidlns/industrialfill.pdf
Waste Classification Guidelines (DECC, 2008)	http://www.environment.nsw.gov.au/waste/envguidlns/index.htm
EPA Resource recovery exemption	http://www.environment.nsw.gov.au/waste/RRRecoveryExemptions.htm
Chemicals subject to Chemical Control Orders	
Chemical Control Orders (regulated through the EHC Act)	http://www.environment.nsw.gov.au/pesticides/CCOs.htm
National Protocol - Approval/Licensing of Trials of Technologies for the Treatment/Disposal of Schedule X Wastes - July 1994	Available in libraries
National Protocol for Approval/Licensing of Commercial Scale Facilities for the Treatment/Disposal of Schedule X Wastes - July 1994	Available in libraries
<u>Water and Soils</u>	
Acid sulphate soils	
Acid Sulfate Soils Planning Maps	http://canri.nsw.gov.au/download/
Acid Sulfate Soils Manual (Stone et al. 1998)	Manual available for purchase from: http://www.landcom.com.au/whats-new/the-blue-book.aspx Chapters 1 and 2 are on DoP's Guidelines Register at: Chapter 1 Acid Sulfate Soils Planning Guidelines: http://www.planning.nsw.gov.au/rdaquidelines/documents/NSW%20Acid%20Sulfate%20Soils%20Planning%20Guidelines.pdf Chapter 2 Acid Sulfate Soils Assessment Guidelines: http://www.planning.nsw.gov.au/rdaquidelines/documents/NSW%20Acid%20Sulfate%20Soils%20Assessment%20Guidelines.pdf
Acid Sulfate Soils Laboratory Methods Guidelines (Ahern et al. 2004)	http://www.derm.qld.gov.au/land/ass/pdfs/lmg.pdf This replaces Chapter 4 of the Acid Sulfate Soils Manual above.
Water	
Water Quality Objectives	http://www.environment.nsw.gov.au/ieo/index.htm
ANZECC (2000) Guidelines for Fresh and Marine Water Quality	http://www.mincos.gov.au/publications/australian_and_new_zealand_guidelines_for_fresh_and_marine_water_quality
Applying Goals for Ambient Water Quality Guidance for Operations Officers – Mixing Zones	http://deccnet/water/resources/AWQGuidance7.pdf
Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)	http://www.environment.nsw.gov.au/resources/legislation/approved_methods-water.pdf



31 January 2013

Ms Emma Barnet
Department of Planning and Infrastructure
emma.barnet@planning.nsw.gov.au

Dear Ms Barnett

**Re: Minto Resource Recovery Facility (SSD 5339)
Manfrieght Dangerous Goods Storage Facility (SSD 5746)**

I write in response to your letter dated 14 December 2012 seeking Council's advice in regard to Director General's Requirements (DGRs) for the proposed expansion of the existing warehouse and distribution facility at 30-50 Yarrowa Street, Prestons, including the use of the facility for the storage of dangerous goods (the "proposed development").

Please note that while the letter to Council was dated 14 December 2012, Council did not receive a copy of the letter until 23 January 2013. As a result, Council requested an extension of time to prepare a detailed response. The request for an extension of time was denied. As such the following is provided, given the limited time available.

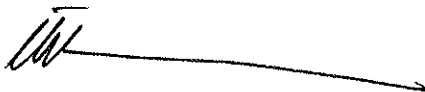
Council advises that the following matters should be incorporated into the DGRs for the proposed development:

- The proposal must fulfil the requirements pursuant to State Environmental Planning Policy 33: Hazardous and Offensive Development including:
 - * provision of a preliminary hazard analysis to support the development application that demonstrates that risk levels do not preclude approval,
 - * provision of a hazard and operability study, fire safety study, emergency plan and an updated hazard analysis undertaken during the design phase of the project,
 - * provision of a construction safety study to ensure facility safety during construction and commissioning, particularly when there is interaction with existing operations,
 - * commitment to implementation of a safety management system to give safety assurance during ongoing operation, and
 - * commitment to regular independent hazard audits to verify the integrity of the safety systems and that the facility is being operated in accordance with its hazards-related conditions of consent.
- The proposal must fulfil the requirements of SEPP 55 – Remediation of Land – Undertake a Stage 1- Preliminary site assessment under the NSW EPA's "*Guidelines for Consultants Reporting on Contaminated Sites*".
- An environmental Management Plan shall be developed. The Environmental Management Plan shall include but not be limited to:
 - * Measures to control noise emissions from the site
 - * Measures to suppress odours and dust emissions

- * Selection of traffic routes to minimise residential noise intrusions
 - * Soil and sediment control measures
 - * Measures to identify hazardous and industrial wastes and the procedures for storage, removal and disposal
 - * Measures to address any other potential hazards given that the site is situated approximately 200m from a significant waterway (Cabramatta Creek) and 205m of a residential area.
- An acoustic report is to be prepared and submitted in accordance with the NSW EPA's *NSW Industrial Noise Policy*. The report shall include but is not limited to the following information:
 - * Noise measurements taken at the nearby noise sensitive locations.
 - * Verification that noise levels at the nearest potentially affected receiver comply with all relevant assessment criteria and where noise measurements required indicate that the relevant assessment criteria are exceeded, recommendations shall be provided in relation to how noise emissions can be satisfactorily reduced to comply with the assessment criteria.
 - A Traffic Impact Assessment (TIA), including intersection treatment and appropriate car parking provision, prepared in accordance with the RMS Guide to Traffic Generating Development carried out by an appropriately qualified and experienced person.
 - A detailed plan of haulage routes and times designed to minimise impact on residential areas and the local road network.
 - An assessment of the impact of required easements around existing Transgrid power infrastructure on the subject site to be conducted by an appropriately qualified and experienced person, with recommendations to be incorporated into the design of proposed internal roads and driveways.
 - The driveway arrangement is to maintain road safety for all road users, and if required separate light and heavy vehicles.
 - Demonstration of commitment to upgrade the access road (Yarrowa Road) and associated drainage infrastructure to industrial standard. Designs for infrastructure works are to meet Council's specifications.
 - A flora and fauna assessment should be required if the area of impact is identified as containing native vegetation or habitat for flora and fauna. The assessment is to be undertaken by a suitably qualified and experienced person.
 - Part of the subject site is bushfire prone. A Bushfire Impact Assessment should be undertaken by a suitably qualified and experienced person and all subsequent recommendations incorporated into the design of the proposed facility.

Should you require any further information on this matter, please do not hesitate to contact Council's Manager of Strategic Planning, Tanya O'Brien, on 9821 9341.

Yours sincerely



Milan Marecic
Director City Planning

Date: 23 January 2013
Our Ref: 2013/001917
Your Ref: SSD-5746

Mr Chris Ritchie
Manager – Industry
Mining and Industry Projects
NSW Department of Planning and Infrastructure
GPO Box 39
Sydney NSW 2001

Attn: Ms Emma Barnet

Dear Mr Ritchie,

**Mainfreight Dangerous Goods Storage Facility, Prestons
Proposed expansion to existing Facility (SSD-5746)**

Thank you for your letter dated 14 December 2012 requesting requirements to be included in the Director-General's Requirements (DGRs) for an EIS relating to the above proposal.

Based on information provided in the 'Overview of Proposed Development' document, the proposed facility would appear to be a Major Hazard Facility (MHF) under the Work Health and Safety Regulation 2011.

We suggest that you include the following in the DGRs.

- Prior to commencement of preparation of the EIS, the applicant must consult with the Major Hazard Facilities Unit of WorkCover NSW and obtain the requirements for the matters to be addressed in the EIS to demonstrate how compliance with the WHS Regulation 2011 will be met.

Should you have any queries, please contact Sohan Fernando on telephone 8281 6485 or e mail sohan.fernando@workcover.nsw.gov.au.

Yours sincerely,



Sohan Fernando
Senior Safety Analyst
Major Hazards Facilities Unit
WorkCover Authority of NSW