

29 August 2016

Michael Azar

Ecove Group

Sent to [michael@ecove.com.au](mailto:michael@ecove.com.au)

Dear Mr Azar,

**Site 9 - Landfill gas design measures and development in context of requirements of SEPP33**

In relation to our meeting held on 24 August 2016 and the correspondence with NSW EPA, namely:

*“The EPA further recommends that DPE requires a separate risk analysis and assessment that considers the details of the gas and leachate management systems and evaluates both probabilities for the systems to fail and consequences if the systems were to fail (in that context, DPE may consider the applicability of State Environmental Planning Policy 33 (SEPP 33) and relevant documents listed In Appendix 1 of this SEPP; we also refer DPE to the document entitled “EPA Guidelines for the Assessment and Management of Sites Impacted by Hazardous Ground Gases 2012” (<http://www.epa.nsw.gov.au/resources/clm/120932GroundGas.pdf>) and particularly Figure 5 on page 23 outlining the risk analysis and assessment process)”.*

We interpret the scope of SEPP 33 for assessing the development of potentially hazardous and offensive operations for the purpose of industry or storage and understand the validity of the regulation for this type of development. However, for the purposes of the Site 9 development, we consider that use of a qualitative Level 1 assessment as described in SEPP 33 is appropriate and a risk analysis can be undertaken using the format described therein.

We do not consider the application of all the requirements of SEPP 33 to be appropriate as the gas mitigation measures are designed in accordance with the NSW guidance and UK industry best practice. There are also several levels of redundancy in the design and on-going monitoring planned until stabilisation of landfill gas has been demonstrated.

We also note that a detailed risk assessment requires the design of the building to be developed well beyond the DA drawing stage and requires Construction Certificate level drawings, as well as specific inputs from the builders (which are yet to be engaged). This

assessment will be undertaken, and will be reviewed and signed off as part of the section B site audit statement, prior to the issue of a construction certificate.

Yours faithfully,

**DLA Environmental Services**



Aidan Marsh  
Manager Queensland