

DOC17/526348

Mr Kelly Mc Nicol
Department of Planning and Environment
Industry and Assessment
PO Box 39
SYDNEY NSW 2001
Kate.masters@planning.nsw.gov.au

Attention: Ms Kate Masters

**Standard Post and Electronic Mail
25 October 2017**

Dear Mr McNicol

Mayfield West Recycling Facility SSD 7698 – Water Assessment

I refer to a letter to the Environment Protection Authority ("the EPA") dated 27 September 2017, prepared by EMM Consulting in relation to the Mayfield West Recycling Facility SSD 7698 and additional Water Assessment information.

The EPA has reviewed the additional information and provides the following advice.

1. The EPA notes that there is adequate area available for additional treatment systems if required and that storage tanks will overflow to sewer. However, the key issue is overflow volume and frequency from the 3-stage pit system (for the potentially contaminated waste area); and also from other areas of the site, if water quality testing highlights water quality risks that are not addressed in accordance with the Blue Book, which is based on managing clean sediment.
2. Prior to consent, the EPA's expected water quality outcomes are understood by the Proponent and can be achieved if post-consent water quality results indicate additional wet weather storage, at-source controls or further treatment are required. This would involve identifying space for additional storage to prevent managed overflows to a frequency appropriate for the level of risk and/or additional treatment or impact mitigation systems, and a commitment to implement such systems based on the outcomes of the characterisation study.
3. As part of the post-consent water quality assessment, the discharge quality and overflow volume and frequency from the 3-stage pit system and other areas of the site (outside the bunded area) be defined and where necessary, appropriate wet weather storage, at-source controls or further

treatment is implemented based on the risk identified in water quality assessment. It should be noted that even with further treatment using a water treatment plant that additional wastewater capture may be required to control the frequency of overflows relative to risk and treatment rate.

While storage tanks overflow to sewer, the key issue is overflow volume and frequency from the 3-stage pit system (for the potentially contaminated waste area) and also from other areas of the site subject to water quality testing, e.g. including the 24,990 m² area outside of the bunded segregated heavy waste processing and stockpiling area.

The pit system has a capacity of only 40,000 litres plus a pumping capacity of 20 litres per second and the pump activates when Cell 3 is about one third full. The overflow frequency from the 3-stage pit system is therefore dependent on the size of the pit system, plus the pumping rate and timing of activation. The frequency of potential overflow from this pit system is not defined or shown to be consistent with the Blue Book requirements. If post-consent water quality results indicate additional wet weather storage, at-source controls or further treatment is required, then any overflow from the pits may need to be at a reduced frequency commensurate with the risk. Similarly, if other areas of the site identify water quality risks the wet weather storage requirements and overflow frequency requirements may need to be greater than required by the Blue Book.

It is noted that Benedict propose to apply the ANZECC/ARMCANZ (2000) default trigger values for slightly to moderately disturbed ecosystems to determine whether to release water from the tanks to the perimeter drain or to the sewer and will work with the EPA to determine whether alternative agreed site-specific criteria are appropriate to replace the default trigger values. Site-specific criteria will not be applied without agreement from the EPA. This is an acceptable approach.

If you have any further questions in relation to this matter please contact Karen Gallagher on 4908 6822.

Yours faithfully



25/10/2017

STEVEN JAMES
A/Manager Regional Waste Compliance
Environment Protection Authority