



DOC17/426803

Mr Kelly McNicol
Department of Planning and Assessment
Industry and Assessment
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Attention: Ms Kate Masters

**Standard Post and Electronic Mail
17 August 2017**

Dear Mr McNicol

Mayfield West Recycling Facility SSD 7698 – 1a McIntosh Drive, Mayfield West.

I refer to your email to the Environment Protection Authority ("the EPA") dated 24 July 2017 requesting comments on Benedict Recycling Pty Ltd's ("the Proponent") Response to Submissions (RTS) for the proposed Mayfield West Recycling Facility located at 1a McIntosh Drive, Mayfield West.

The EPA has reviewed the RTS and provides the following comments and recommended conditions of approval.

Noise Impact Assessment

The EPA supports the Proponent's request that a Traffic Noise Management Strategy (TNMS) is no longer required as the supporting information predicts the road traffic noise being negligible and within the 2dB allowable for land use developments. The EPA's recommended conditions of approval provided to the Department of Planning and Environment (DPE) on 23 February 2017 (DOC17/126618) remain unchanged.

Air Quality Impact Assessment

The EPA has reviewed the revised air quality assessment, noting that the dispersion modelling was revised to use significantly more refined emission rates which provide a more accurate representation of how the expanded facility will operate. A frequency analysis using the revised modelling results at the neighbouring industrial facility to the west of the site predicted an additional 0.5 and 0.03 days of exceedances of 24 hour average PM10 and PM2.5 criteria respectively. Since the predicted additional exceedances are fractions of a day per year, the revised air quality

assessment concluded that the proposed expansion and management measures will not cause any adverse impacts to the environment.

The revised air quality assessment indicated that the exceedances are most likely to occur at the nearby industrial receptors, where project related 24-hour average PM₁₀ concentrations were predicted to be in the range of 2.4-5.6 µg/m³. In contrast, project related 24-hour average PM₁₀ concentrations at residences were predicted to be much lower, in the range of 0.6-1.3 µg/m³. It concluded that therefore predicted additional exceedances of 24 hour average PM₁₀ and PM_{2.5} criteria at nearby residences would be much lower than 0.5 and 0.03 days.

The following emission controls, which were included in the assessment, are proposed to be employed:

- Water sprinklers at crushing/screening plant;
- Sealing of all operating, storage, unloading and loading areas;
- Minimising areas of exposed earth through suitable landscaping;
- Utilising dust suppressants (e.g. light water spray);
- Installing wind breaks to prevent particulates becoming airborne;
- Regular cleaning/sweeping of sealed surfaces;
- Water spraying during material transfer, screening and crushing operations; and
- Water spraying of the stockpiles.

I note that the revised air quality assessment did not propose any further control or management measures to reduce dust impacts. Specifically, the revised air quality assessment considered that the proposed control and management measures specified above were adequate, and enclosing the processing building, and/or adopting management measures when the meteorological conditions were unfavourable, were not considered necessary.

The EPA advises the DPE that Conditions of Approval for the project should include a requirement for an updated air quality management plan, including site-specific benchmarking of best management practice particle emission controls, and appropriate response mechanisms. The attached Recommended Conditions of Approval (Attachment A) should reflect the refined modelling assumptions made in the revised air quality assessment.

Water Assessment

The EPA is seeking specialist advice in relation to the water assessment and anticipates comments will be provided to the DPE in the coming week.

If you have any questions regarding this matter, please contact Karen Gallagher on (02) 4908 6822.

Yours faithfully



STEVEN JAMES
Acting Manager Regional Waste Compliance
Environment Protection Authority

Enclosure: Attachment A – Air Recommended Conditions of Approval.

ATTACHMENT A – RECOMMENDED CONDITIONS OF APPROVAL FOR SSD 7698

AIR

Air Quality Management Plan

1. For all emission sources at the site the proponent must prepare an air quality management plan that includes, but is not limited to:
 - *Site specific benchmarking of emission controls with best management practice*
 - *Key performance indicator(s);*
 - *Monitoring method(s);*
 - *Location, frequency and duration of monitoring;*
 - *Record keeping;*
 - *Response mechanisms; and*
 - *Compliance reporting.*
2. The air quality management plan must be implemented prior to the commencement of any dust generating activities associated with the proposed modification.

Dust

3. All onsite roads and carparking areas must be sealed with concrete or asphalt;
4. All operating, storage, unloading and loading areas must be sealed with concrete, asphalt, or other impervious barrier of the same or greater quality;
5. The ancillary storage area cannot be used for any particulate generating activities;
6. Water sprinklers at the crushing and screening plant must be utilised at all times when the plant is operational;
7. Dust suppressants must be used to prevent particulate emissions from stockpiles and other dust generating sources;
8. Trucks entering and leaving the premises that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and unloading;
9. Campaign crushing must occur for no more than 46 days per year;
10. All operations and activities occurring at the premises must be carried out in a manner that prevents and minimises the emission of air pollutants from the premises; and
11. The premises must be maintained in a manner that prevents and minimises the emission of air pollutants.

