

## Attachment 1 Department of Planning, Industry and Environment Comments

### Water Management

1. The Department reiterates its previous concerns about the effectiveness of the proposed floating wetland for water treatment. The Department notes Section 7.10 of the WCIA states:

*we note that we have not modelled the benefit of the proposed floating wetlands in the MUSIC model because it is believed that the science behind the FTWs is still in its infancy and needs further research under a broader range of conditions before the models being considered rigorous. Research to date has not measured the performance under a configuration such as the one proposed in this project where the pond is also used for stormwater harvesting. In conclusion, at this time, there is a lack of suitable scientific data available with which to model FTWs as proposed on this project. Results in this report are therefore to be considered somewhat conservative.*

Considering these uncertainties and that the water treatment pond would treat both a mix of clean stormwater and leachate, please include justification and evidence the proposed floating wetland is suitable and effective in treating the collected water in the RtS. Furthermore, please clarify what is meant by the results of the WCIA are “*considered somewhat conservative*”.

2. The Department notes Figures 2.5 and 2.6 of the Somersby Industrial Park Plan of Management show the southern part of the site is covered by Hawkesbury Coastal Banksia Woodland, sandstone hanging swamps and heaths, and exposed Hawkesbury Woodland which provides significant habitats. The WICA states the proposed water treatment pond would discharge to Kangoo Road via the retained bushland eight times per year.

The Department reiterates its previous concerns about the potential impacts of discharging water on the ecological value of the retained bushland and downstream receivers and water users. Unlike recycled water used on-site which would be treated by a stormwater treatment plant, the only treatment for discharged water would be the water treatment pond comprising an OSD basin and a floating wetland.

The WCIA only includes water quality criteria for recycled water to be used on-site and did not provide an appropriate monitoring program including all pollutants of concern and relevant criteria for the discharged water as requested by the Department in its SEARs and previous adequacy review comments. Further, considering the uncertainty of the effectiveness of the floating wetland, please ensure a downstream impact assessment and a monitoring program including all pollutants of concern and relevant criteria is included in the RtS.

3. The Department previously requested clarification of the triggers for water to discharge from the water treatment pond. The WCIA only states the frequency has been reduced from 25 to 8 times per year but does not provide clarification of the trigger. Please provide the trigger in the RtS.

### Waste Processing

4. The Department has identified discrepancies in waste processing as described in the amended EIS and the Waste Management Plan (see Attachment 2). Please provide a clear waste processing description in the RtS.
5. Please clarify if waste delivery vehicles and landscaping/aggregate supply vehicles are owned and operated by the Applicant or by contractors. Should the vehicles be operated by contractors, please clarify what measures are proposed to track and schedule the arrival and departure of vehicles to ensure vehicle queuing on Gindurra Road would not occur.
6. The Department notes the WMP states that *soil loads that meet the criteria for Excavated Natural Materials (ENM), will be either sold unprocessed as ENM, or blended and processed with other soil materials to produce manufactured soils*. The EPA submission on the original development (dated 25 March 2019) states that any material that has been processed cannot be considered ENM. The EPA considers that processing ENM significantly increases the risk for contamination and encourages poor practices such as blending contaminated materials with cleaner waste streams.

The WMP does not address the EPA comments. Please confirm that no ENM will be processed/blended on-site in the RtS and provide an updated WMP accordingly.

7. The Department notes Section 6.3.2.2 of the amended Environmental Impact Statement (EIS) and Section 3.2.2 of the WMP include standard inspection requirements described in Section 1.2 of Standards for Managing Construction Waste in NSW (EPA, April 2019) which is not specific for the proposed operation. Please provide development specific inspection requirements and clarify following matters:
  - (a) should the entire load be rejected after unloading, how will it be loaded back to the vehicle?
  - (b) would only one vehicle load be inspected at the Tip and Spread building at any given time or would be multiple loads be inspected simultaneously?
  - (c) should multiple loads be inspected simultaneously, and one load need to be rejected, please clarify how the Applicant will ensure the non-conforming waste load would be separated from other loads in the Tip and Spread Building.

### **Air quality**

8. Please include a table of 24-hour concentrations of PM<sub>2.5</sub> and PM<sub>10</sub> (background, incremental, and cumulative) at all receivers in the Air Quality Impact Assessment (AQIA) which is similar to Table 21 of the AQIA.
9. The AQIA only provides a brief silica dust impact assessment as follows:

*adjustment of the annual average PM<sub>2.5</sub> modelling results to account for the potential worst-case silica content of processed materials (67%) results in a predicted incremental RCS concentration at the worst affected receptor of 0.28 µg/m<sup>3</sup> which represents >10 % of the criterion. Even with the addition of a background concentration of 0.7 µg/m<sup>3</sup>, the maximum RCS concentration is less than one third of the Victorian EPA and the California EPA Office for Environmental Health Hazard Assessment annual average criterion of 3 µg/m<sup>3</sup>.*

please provide a table of incremental and cumulative concentrations of respirable crystalline silica at all receivers to justify the project will not negatively impact on the health of the community, even at the closest residential receptor.
10. Please respond to all issues raised in Todoroski Air Sciences Peer Review of Kariong Sand and Soil Supplies Air Quality Impact Assessment dated 22 September 2020.

### **Noise and Vibration**

11. Please include predictions of PNLs at all receivers without mitigation measures in place in the Noise and Vibration Impact Assessment.
12. Please respond to all issues raised in the technical review prepared by Muller Acoustic Consulting dated 23 September 2020.

### **Traffic and Access**

13. The Department notes traffic surveys were undertaken in 2017 and raises concerns about whether the survey results sufficiently represent the current traffic conditions as a result of recent proposed and completed development. As such, please provide a more recent survey result adequately representing the existing traffic in the site's vicinity and key intersections performance.

Should a new traffic survey be undertaken, considering the COVID-19 pandemic, counts undertaken at the moment may not be representative. Alternative approaches to understanding the impact of COVID-19 pandemic on traffic patterns should be discussed with TfNSW.
14. The Traffic Impact Assessment (TIA) states traffic surveys were undertaken at Central Coast Highway/Kangoo Road and Central Coast Highway/Wisemans Ferry Road intersections. Please provide traffic survey result of Central Coast Highway/Kangoo Road intersection for the completeness of the report.
15. The TIA should assess the worst-case scenario when waste delivery vehicles from south using Central Coast Highway/Kangoo Road intersection and its impacts on the intersection performance.
16. The TIA does not detail the proposed management measures for prohibiting waste delivery vehicles using Kangoo Road, Acacia Road and Debenham Road South to access the site. Please detail the management measures in the RtS.

17. Please provide SIDRA modelling results for Wisemans Ferry Road/Gindurra Road intersection (the overall Level of Service (LoS) and LoS at AM and PM peaks in the TIA).
18. The queueing analysis included in Section 3.2.4 of the TIA is insufficient considering it does not detail how long would it take for a truck to be processed at the weighbridge including weighing and visual inspection of waste load. Please clarify and provide additional queueing analysis in the RtS.
19. Please respond to all issues raised in the peer review prepared by Intersect Traffic dated 22 September 2020.

**Other Issues**

20. The Department notes Figure 3.5 of the WMP shows skip bin locations, but these locations are not shown on the civil plan. Please update the civil plan to ensure its consistency with the WMP.

## Attachment 2 Discrepancies in Waste Processing Description

Waste Type	Amended EIS	Waste Management Plan	Discrepancies and Issues
<p><b>Mixed Building Waste</b></p>	<p>Mixed building waste is transferred from the waste storage area via front end loader to the Secondary Sorting Warehouse. Remaining materials would be deposited into chutes and into separate hook lift bins beneath the sorting line. The material remaining after the picking line would be directed to a hook lift bin for disposal at a licensed landfill facility. Timber and concrete/aggregate would be transferred to the Waste Storage Bays, awaiting processing.</p>	<p>Loads would be received separately in B-Doubles, semi-trailers, skip bins or rigid trucks, tipped in an unloading bay in the Tip and Spread Building, then moved via front end loader to the Mixed building waste storage bay. Material would then be subject to a primary sorting process using a grab excavator to remove concrete, steel and timber. Residual waste to be stored in skip bin or a separate bunker and disposed off-site.</p> <p>Concrete, masonry, clean timber from the primary sorting process would be separated and crushed, shredded and screened to specifications to produce saleable products.</p> <p>Residual waste from the primary sorting process would be stored in skip bin before being transferred to a secondary sorting facility located in the warehouse building at the North of the site. Concrete, brick, asphalt, paper, cardboard, plastic and metals would be separated at the secondary processing stage. Separated materials would be stored in skip bins prior to being transferred for recycling. Residual waste from the secondary processing stage would be stored in skip bins prior to being disposed off-site at a landfill.</p>	<p>1. Please clarify the location of the skip bins and bunkers storing residual waste generated from the primary sorting process.</p>
<p><b>Concrete, tiles and masonry</b></p>	<p>Waste materials are moved from waste storage bunkers into the 'Processing Area' via front end loader, as required. Concrete/masonry is processed in the Crusher Building. The sorted products are removed to the Products Storage Area. Soils and aggregate materials from the Processing Area would be stored in separate piles within the dedicated Product Blending Area. Here, materials would be blended as needed to manufacture products for building and landscaping</p>	<p>Loads would be received separately in B-Doubles, semi-trailers or rigid trucks, tipped in the unloading bay associated with the Tip and Spread Building, then moved via front end loader to the Concrete/tiles/masonry storage bay. Material would then be crushed/screened in the Processing area then stored in a pile then moved to the Landscape supplies bunker for sale.</p>	<p>1. Please clarify whether crushed concrete, tiles and masonry would be blended in the blending area before being stored in the landscape supplies and aggregate storage bays.</p>

Waste Type	Amended EIS	Waste Management Plan	Discrepancies and Issues
	<p>applications. Products, once blended, would be stored in separate piles and sampled/tested to confirm compliance with an appropriate EPA Resource Recovery Order. Products would then be moved by front end loader to the Landscape Storage Bays or the Aggregate Storage Bays, awaiting sale.</p>		
<p><b>Timber, stump and root balls</b></p>	<p>Wood and timber are processed in the Mulcher Building, with the mulch product removed to the Products Storage Area. Soil and aggregate materials from the Processing Area would be stored in separate piles within the dedicated Product Blending Area. Here, materials would be blended as needed to manufacture products for building and landscaping applications. Products, once blended, would be stored in separate piles and sampled/tested to confirm compliance with an appropriate EPA Resource Recovery Order. Products would then be moved by front end loader to the Landscape Storage Bays or the Aggregate Storage Bays, awaiting sale.</p>	<p>Loads would be received separately in rigid trucks, tipped in the unloading bay associated with the Tip and Spread Building, then moved via front end loader to the Timber storage bay. Material would then be chipped in an on-site shredder. Chipped material would then be moved via front end loader to the timber mulch storage bay in the landscape supplies area.</p>	<p>1. Please clarify whether chipped timber would be transferred to the blending area before being stored in the landscape supplies storage bays.</p>
<p><b>Asphalt</b></p>	<p>The amended EIS does not include asphalt in the processing description.</p>	<p>Loads would be received separately in B-Doubles, semi-trailers or rigid trucks, tipped in the unloading bay associated with the Tip and Spread Building, then moved via front end loader to the Asphalt storage bay. Material would then be crushed/screened in the Processing Area then stored in a pile then moved to the Landscape supplies bunker for sale.</p>	<p>1. The amended EIS does not include asphalt in the processing description. Please clarify if asphalt would be processed as described in the Waste Management Plan.</p>
<p><b>VENM</b></p>	<p>The amended EIS only states clean soil would be tested and transferred to a product storage bay for sale.</p>	<p>Loads would be received separately in B-Doubles, semi-trailers, or rigid trucks (e.g. 12 t), tipped in the unloading bay associated with the Tip and Spread Building, then moved via front end loader to the VENM storage bay. Material to be blended and/or sold as manufactured soil would then be screened in the</p>	<p>1. The amended EIS does not include VENM in the processing description. Please confirm if VENM would be processed as</p>

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		Processing area then stored in a pile then moved to the Landscape supplies bunker for sale. Material to the sold as VENM would be transferred, unprocessed, to the sale area.	described in the Waste Management Plan.
<b>Soil</b>	The amended EIS only states clean soil will be tested and transferred to a product storage bay for sale.	<p>Loads will be received separately in B-Doubles, semi-trailers or rigid trucks, tipped in unloading bay associated with the Tip and Spread Building, then moved via front end loader to the soil storage bay. Materials will then be screened in the Processing area then stored in a pile then moved to the Landscape supplies bunker for sale.</p> <p>Soil loads that meet the criteria for Excavated Natural Materials (ENM), will be either sold unprocessed as ENM, or blended and processed with other soil materials to produce manufactured soils.</p>	1. Please clarify the location of the dedicated soil storage bay. The civil plan only shows dedicated ENM and VENM storage bays.