



Our ref: DOC21/17584-9
Your ref: SSD 8660

Department of Planning and Environment
Industry Assessments
4 Parramatta Square
PARRAMATTA NSW 2150

Attention: Mr Bruce Zhang

By Email
5 February 2021

Dear Mr Zhang

**State Significant Development SSD 8660 – Construct and operate resource recovery facility
– 90 Gindurra Road, Somersby**

I refer to your email dated 14 January 2021 requesting comment from the Environment Protection Authority (**EPA**) about SSD 8660 (**the Application**). The Application seeks to construct and operate a resource recovery facility to process 200,000 tonnes per annum of soils and building and demolition waste at 90 Gindurra Road, Somersby.

The EPA has conducted a review of the information provided in the Supplementary Response to Submissions (**RtS**) and associated technical reports responding to environmental issues in the amended EIS. This review of the RtS document has shown that the development can operate in a manner that poses minimal risk to the surrounding environment, however this is subject to several operational conditions and recommendations. The review was undertaken by separate technical branches of the EPA and their comments are attached to this letter (**Attachment 1**)

If you have any further enquiries regarding this matter, please contact Kasey Williams on (02) 4908 6859.

Yours sincerely

Steven James
Unit Head Regulatory Operations Metro North
Environment Protection Authority

Attachment 1

A. Noise Impact Assessment

In addressing the EPA's noise issues outlined in DOC20/922391 to Industry Assessments dated 6/11/2020, the RtS refers to the Noise and Vibration Impact Assessment Addendum 6 to the RtS which is a letter from Wave Acoustics dated 9 December 2020 - Document No. 60.00741.05 LTR1R2.DOCX (**RtS NIA**). The RtS NIA states:

“The Waves Consulting report used a ‘representative’ background noise level location as per the requirements of the NSW Noise Policy for Industry (NPI). The NPI does not target the lowest background noise level in an area which may only affect a few receivers. The aim of the NPI background noise monitoring is to capture a representative noise level which characterises the average of the receivers in the area”.

The EPA does not agree with this interpretation of the NPfI. The NPfI states that background noise monitoring should be undertaken at the *“Reasonably most- or potentially most-affected residence(s)”*. The NPfI states that where this is not possible, ‘representative’ locations should be selected and fully justified. The term ‘representative’ should not be inferred to mean anything other than ‘representative’ of the reasonably most affected residence.

That said, the acoustic environment in the area would be largely controlled by traffic on the M1 and other removed diffuse sources including industrial noise and local traffic. The PNTL for daytime hours is controlled by the amenity criteria and is 2dB lower than the daytime intrusive criteria. The EPA accepts that this 2dB margin is sufficient to mitigate against potential differences in background noise at the monitoring location versus nearby residences. The EPA also notes that the RtS NIA confirms that the site was not operational during the monitoring period.

In addressing EPA's concerns about the adopted sound power levels for the crushing and screening plant, the RtS NIA has confirmed that the levels used were supplied by the manufacturer and represent equipment operating under maximum load. Additionally, further mitigation measures have now been proposed as follows:

“Recent proposed design changes as provided by Jackson Environmental Planning Pty Ltd (dated 27 November 2020) show that the Screen and Crusher operations will now be housed inside fully enclosed buildings, with only small openings to allow conveyor belts into and out of the building. The conveyor belts will also be fully enclosed and capped with thick rubber curtains. The buildings / enclosures will be constructed of standard Colourbond sheeting and the openings will be covered with thick rubber curtains. The adjacent bunkers will be constructed of thick concrete walls with one (1) thick rubber curtain wall and roof. Waves Consulting estimate that these changes will reduce noise emissions by 10 to 15 dB”.

The EPA considers the revised mitigation measures to be an appropriate safeguard.

B. Air Impact Assessment

The EPA has reviewed the RtS and notes the following key changes have been made to address the issues raised in relation to air quality; the proponent is proposing a staged approach to approvals with initial approval sought for 100,000 tonnes per annum (tpa) operation. This is a significant reduction from the 200,000 tpa previously applied for. This approach is proposed to account for any uncertainties associated with the project.

Re-modelling of the project has been performed at the maximum production rate of 200,000 tpa and the emissions inventory for the project has been adjusted. The revised modelling predicts compliance with the EPA's impact assessment criterion for TSP, PM10 and PM2.5. It is noted some significant ($>20\mu\text{g}/\text{m}^3$) incremental impacts are still predicted to occur at some nearby receptors. However, it is acknowledged that the modelled scenario is at the maximum processing rate of 200,000 tpa, and some additional conservative assumptions have been adopted. Additionally, the proponent proposes a staged development and will install air quality monitoring equipment and develop a site-specific air quality management plan.

Some uncertainty remains in the representativeness of the meteorological monitoring used in the modelling. However, the associated uncertainties have been reduced through the commitment to fully enclose structures around processing activities. Additionally, the proponent proposes to install a meteorological monitoring station at the premises which will provide site specific data for any future assessments.

It is proposed that the tip and spread building will only have three fully enclosed sides, with a large open front for vehicle access. The EPA considers the design of the structure could be further improved by fully enclosing all sides of the building. However, the risk of air quality impacts occurring from this building have been reduced via a ceiling mounted dust suppression system. Additional management measures such as minimising drop heights, visual monitoring and hand-held dust suppression are also proposed. As such, the EPA considers the risk of potential air quality impacts from the building are low, where site operations are managed appropriately.

The EPA considers the assessment has been done in general accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants and has satisfied the EPA's request for additional information. Some uncertainty remains regarding the assessment and the associated impacts on air quality. However, the EPA consider this uncertainty can be addressed through conditions of approval for the project.

The EPA considers that the RtS adequately addresses the remaining air quality issues and recommend the following conditions of consent.

1. Air Quality Management Plan

The proponent must prepare and maintain an Air Quality Management Plan for the site. The plan must include both proactive and reactive measure for all significant emission sources at the premises. The plan must include, as a minimum, A Trigger Action Response Plan (TARP) and the following information, for all dust generating activities at the site:

- Key performance indicator(s);
- Monitoring method(s);
- Location, frequency and duration of monitoring;
- Record keeping;
- Response mechanisms; and
- Compliance reporting.

The Trigger Action Response Plan (TARP) must, at a minimum:

- detail proactive measures to minimise air quality impacts;
- identify real-time boundary monitoring trigger levels for remedial action; and,
- detail the remedial action that will be taken if trigger levels are exceeded.

2. The proponent must development and implement an ambient air monitoring strategy for the premises incorporating continuous particle monitoring, including but not limited to, total suspended particles and particulate matter $<10\ \mu\text{m}$ (PM₁₀).
3. The Proponent must install and operate a meteorological monitoring station at the premises.

C. Water Impact Assessment

The EPA has reviewed the RtS and makes the following recommendations in relation to water impacts:

The stormwater treatment design has been modified, with removal of the floating treatment wetland, and changes to the operation of the OSD to include a '5-day trigger' for controlled discharges once water quality 'criteria' have been achieved. These 'criteria' are to be developed in consultation with the EPA and are to be based on the ANZECC (2000) guidelines for slightly to moderately disturbed ecosystems. This modification aims to reduce the uncontrolled overflow frequency from 8 to 3 events per year. It is recommended the applicant confirms that the removal of the wetlands from the OSD basin, and the addition of controlled discharges does not change the total volume of water discharged to the environment.

The RtS includes changes to some of the building enclosures. In some sections of the RtS, the roof material of the crusher and mulcher buildings is Colourbond steel, elsewhere it is stated to be canvas. It is recommended that the applicant commits to roofing material that will be impervious to water to minimise the generation of polluted runoff.

The applicant has agreed to all of the EPA's previous recommended conditions of approval, with the exception of the following: *'The southern portion of the site (approximately 4ha) will remain as undeveloped, vegetated buffer during the life of the facility'*. The applicant states that whilst there is no current intention of further developing this land, they consider there is not a link between the recommended condition and the development proposal. The EPA recommends this condition of approval be revised to *'Should the land use or hydrology of the southern portion of the site (approximately 4ha) change during the operation of the site, a revised impact assessment should be prepared to ensure residual risks to the environment remain unchanged'*.