NSW GOVERNMENT
Department of Planning and Environment

Ms Nancy Zheng
Executive Manager
Plasrefine Recycling Pty Ltd
Suite 607, Level 6
109 Pitt Street
Sydney NSW 2000

14 April 2022

Dear Ms Zheng

Moss Vale Plastics Recycling Facility (SSD-9409987)
Request for Additional Information

I refer to the Department's request for a Response to Submissions Report (RtS) dated 24 March 2022. The Department has subsequently finalised its review of the Environmental Impact Statement (EIS) prepared to support the above application.

The Department's review and the submissions received during the exhibition period from the general public, have identified the proposed access road and social impact as key issues with the proposed development. The Department requires you to include a response in your RtS to the issues raised in Attachment 1, along with those identified in previous correspondence dated 24 March 2022, in accordance with clause 82(2) of the Environmental Planning and Assessment Regulation 2000.

Please note that advice from Wingecarribee Shire Council and Transport for NSW has not been received, these pieces of advice will be forwarded to you when they are received.

If you have any questions regarding this matter, please contact Emma Barnet on 9274 6412 or emma.barnet@planning.nsw.gov.au

Yours sincerely

Chris Ritchie
Director
Industry Assessments

ATTACHMENT 1

Social Impact Assessment

- The Department received over 300 submissions during exhibition of the EIS for the development. Many of these submissions raised concern about the social impacts of the development. Please provide a more detailed Social Impact Assessment to address community concerns.

Access Road

- Please provide additional design detail for the proposed access road, particularly the intersection treatment for the intersection with Lackey Road. The design will need to include all road infrastructure improvements required and demonstrate the proposed vehicles can safely use the access road and intersection. Any proposed design also needs to demonstrate the relevant roads authority is satisfied with the proposed design.
- Alternate access options, such as a potential route from the North of the site, could be considered to help mitigate impacts to residential receivers.

General

- The EIS describes the site as Lot 11 DP 1084421 with an access road traversing Lot 1 DP 26490 and Lot 10 DP 1084421. The assessed access road crosses two lots for which landowner's consent is required. In addition, it appears Lot 11 DP 108442 is not owned by Plasrefine Recycling Pty Ltd. Please provide landowner's consent for:
  - Lot 11 DP 1084421 owned by The Trustee for Mr LYU Trust
  - Lot 1 DP 26490 (proposed route 2b)
  - Lot 10 DP 1084421 (proposed route 2a and 2b)
- Many submissions received by the Department were concerned that the location of the proposed development is not appropriate. Please provide further justification for the development in terms of its location and potential distance to waste providers. As part of the justification, please provide more information on where waste would be sourced from and where products would be dispatched to.
- An existing dam which crosses the property boundary into Lot 10 DP 1084421 is proposed to be modified. Please provide details of the proposed works to be undertaken and a dam dewatering report if required.

Process

- The proposed development would have the capacity to accept and process up to 120,000 tpa of plastic waste. Please confirm the proposed development's maximum daily processing capacity.
- It appears all product storage would occur in building 2. Please clarify if building 1 would be used for any storage for plastic products. If so, please show on a plan.
- Please confirm if all plastic products would be despatched from building 2.
- Please confirm approximately how many transfers of product between building 1 and building 2 would occur a day.
- Show on the site plan where different plastic types would be stored.
- Describe the product manufacturing lab.
- Provide addition process description as follows:
  - describe how the plastic is dried before granulation
  - describe the water granulation process.
  - how steam is generated for the steaming/disinfectant process
  - what the energy source for extrusion granulation is.

Water

- Provide justification for the expected water demand and wastewater generation for the facility and include a detailed water cycle showing a breakdown of the water demand, loss, and wastewater generation for each process and how this interacts with the wastewater treatment plant, wastewater discharge and potable water demand. The water balance is to show required flows in both periods of drought and high rainfall.
- The water balance shows 30KL/d is lost to evaporation clarify at what point in the process this occurs and whether it is captured via an emission control system.
- Confirm how frequently and how much stormwater would discharge from the site compared to pre-development levels.
- The Water and Wastewater Modelling report (WWM) appears to use average flows to describe peak flows for both water consumption and wastewater discharge. Please clarify if the average flows are representative of actual expected peak flows and how this will be achieved in each case.

- Both the water supply and STP are stated to have limited capacity and are likely to be over capacity in the near future. Please demonstrate that the proposal will not put additional stress on over capacity water/wastewater systems.

Traffic

- Provide a break-down of the heavy vehicle traffic trip generation by hour showing whether trucks are bringing in waste or picking up product. Describe how incoming heavy vehicles would be scheduled across the day and the expected tonnage of each vehicle.
- The Traffic and Transport assessment is based on the assumption that all heavy vehicles delivering to the site would be 20 tonnes. Please advise how this would be enforced.
- The identified transport route crosses the railway line at the northern end of Berrima Road. Please assess the potential impact at this railway crossing.
- Justify the assumed trip distribution where 60 % of the trucks would come from and leave to the south.

Noise

- Justify the use of the chosen noise model for traffic noise as it does not discern the difference between a small and large truck and does not include the effects of acceleration and engine compression braking.
- Please clarify how many trucks have been modelled onsite at any one time and demonstrate compliance with the numbers predicted by the traffic assessment.
- Please provide contingency measures for night-time noise given It is predicted to be at the noise trigger level.
- Provide more information to demonstrate the internal noise level would remain below 85 dBA, including mobile plant.
- The design is high level and as such predictions are based on certain assumptions. Please provide greater detail about the façade construction which will be required to meet a specific noise reduction performance.
- The NIA appears to assess traffic noise with a maximum of 5 trucks in a peak hour period. Please provide justification for this peak movement rate including a breakdown of all expected truck movements throughout the day.
- Table 5.13 of the NIA provides source heights for vehicle noise generation. Please clarify if the elevation of the access road has been considered in the modelling.
- Table 5.13 of the NIA states that traffic speeds with be 25 km/hr, adding that this is conservative. Please provide the expected speed limit of the proposed access road and justification for the modelled speed limit for both trucks and light vehicles.

Air Quality

- Explain how the emission control systems (ECS) would operate and which process they would be attached to.
- Show the ECS on the site plan.
- Provide the modelled cumulative impacts as well as incremental for PM_{10} and $PM_{2.5}$.
- It would appear there is potential for odour emissions from the residual waste in the plastic containers and sludge handling at the wastewater treatment plant. Please undertake an odour impact assessment in accordance with the SEARs.
- Section 5.3.3 of the Air Quality and Odour report (AQOR) states that *'The majority of residential receptors are to the south of the proposal with the closest located to the southeast. The wind rose presented in Figure 4.2 shows winds in the direction of these receivers, from the northwest, are rare.'* The wind roses show significant wind from the northeast and west. Please clarify the likely impacts of these winds on residential receptors.
- The AQOR assesses impacts on the assumption that maximum Protection of the Environment Operations Act emission limits are achieved. Please justify this assumption and provide expected emission data from each process.
- The AQOR states that *'The modelling assessment included emissions from the four air pollution control system stacks only'*. Please include all potential sources of emissions or provide justification for the limited modelling.
- The cumulative assessment within the AQOR utilises data from Bargo (~39Km away) despite a number of local pollution sources being identified. Please justify the use of data from Bargo or assess the likely cumulative impact with consideration to the local pollution sources.

Plans

- Please provide the following additional plans:
  - a cut and fill plan

- a final contour plan
- individual drawings of the proposed plant
- details of the administration building, offices, and lab.
- the layout of the wastewater treatment building

- Please label all equipment on the site plan

Waste

- Provide the site's total waste storage capacity in tonnes as well as a tonnage per bunker.
- The process to produce refuse derived fuel (RDF) is unclear. Please clarify, if waste would be sent for further processing into RDF or if it will be sold as RDF. If RDF is proposed to be produced on site, the NSW Energy from Waste Policy Statement and associated guidelines are to be addressed.
- Please advise how much RDF would be produced and clarify if the 15,000 tonnes of RDF referred to in Table 7.2 is additional to the 9,000 tonnes included in table 7.3.
- Show on the site plan where the RDF would be stored.
- Show on the site plan the where the process residues would be stored and explain how they are removed offsite.
- Show on the site plan where staff generated waste will be stored.
- Provide contingency measures for plant breakdown given the limited onsite storage.

Visual

- Please provide further justification regarding the proposed bulk and scale of the development given the concerns raised by the general public during the exhibition period. This justification should also clearly demonstrate that design variations have been considered with respect to the height and bulk of the development. particularly the 18 m high office. The design details are sparse and high level as it appears further detail/visual mitigation would be provided during detailed design. The Department requires a better understanding of visual impacts. As such, further details about finishes including façade treatments, colour and landscaping should be provided, including revised plans. Finishes must consider the proposed bulk and scale in the context of the surrounding area.
- The office building is proposed to be up to 18 m high, yet the visual assessment does not appear to have addressed this aspect. Please clarify.
- As the site would operate 24 hours per day, it is expected there will be some lighting required. Provide details about the proposed lighting and undertake a light spill impact assessment.
- The EIS states that one of the features of the proposal is signage, and that consideration to (former) SEPP 64 was undertaken as part of urban design and visual assessment. However, the EIS does not contain imagery nor an assessment against Chapter 3 of the State Environmental Planning Policy Industry and Employment. Please address.
- Provide a photomontage of the proposal from Collins Road that also shows the developments to either side.