

Mr Fred Itaoui
Director
Bioelektra
Unit 31, 287 Victoria Road
Rydalmere NSW 2116

22 July 2021

Dear Mr Itaoui

**West Nowra Resource Recovery Park Stage 2 (SSD-9887)
Response to submissions**

I refer to the letter dated 13 July 2021. The Department has now completed a review of the EIS and provides the attached comments (Appendix 1). Please ensure these comments are addressed in the Response to Submissions.

If you have any questions, please contact Kathryn Moreira on 0292746086/ at kathryn.moreira@dpie.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Will Hodgkinson'.

**Will Hodgkinson
Team Leader
Industry Assessments**

Appendix 1: Additional Information Request West Nowra Resource Recovery Facility Stage 2 (SSD-9887)

Key issues

1. General Requirements

- **Architectural Plans**
 - The Plans at Appendix F lack sufficient details to carry out an assessment of the SSD. The following amendments / additional information is required:
 - Provide the construction material types for the external surfaces (e.g. what is the “hardstand” area proposed to be constructed of (road building gravel, concrete, asphalt?)
 - Provide plans for the roof structure described on pg. 42 of the EIS for the covered holding bays.
 - Provide an elevation of the development from the south showing the entire office.
 - Provide a plan for the car park showing traffic flow and parking spaces in accordance with Australian Standard 2890.
 - Provide the location of the proposed 1MW solar system.
 - Floor Plans
 - The location of all proposed plant and equipment, stockpiles, conveyors is required – similar to image on pg. 40.
 - Provide the location of waste inspection area inside the reception hall.
 - Provide the location of non-conforming waste stockpiles or areas.
 - Details of any internal leachate management system (pit and pipe network, blind sumps, grates?).
 - Details of any bunded areas proposed.
 - Provide the maximum stockpiling capacity of each recovered material bay.
 - Provide the location of the two unloading areas for the incoming waste including push walls.
 - Location of the ventilation and process air extraction system.
 - A concept Landscaping Plan is required to be submitted as an Appendix to the EIS and discussed and assessed throughout the EIS where necessary.
 - A Site Analysis Plan detailing the location of adjoining buildings, structures and uses is required.
 - Provide location of essential services (potable water and electricity)
- **Queuing Plan**
 - Plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network;
 - a truck queuing plan is required indicating that the maximum amount of trucks proposed to be on the site at any given time (including awaiting to enter the weighbridge) can be catered for wholly within the site.
- **Stormwater Plan**
 - A detailed stormwater / wastewater plan is required detailing the stormwater system proposed to collect, hold and discharge stormwater.
 - Figure 3-1 in the Soil and Water Assessment lacks sufficient detail:
 - Provide the ultimate discharge point for the sediment basins / wetland
 - If the south-eastern basin is to be removed as part of Stage 1 it should not be included on the plan
 - Location of wastewater tanks discussed in section 3.1.1 of the Soil and Water Assessment.
 - It is unclear how stormwater from hardstand areas would be directed to the proposed pipe/culvert network.
 - Provide details of proposed firewater system.

2. Waste Management

- How were the incoming waste stream breakdowns derived? Was Shoalhaven Council's collected red bin data used to understand potential waste streams and breakdowns?
- Provide the maximum quantity of waste which can be processed in the autoclaves at any given time.

- NSW Energy From Waste Policy Statement (EfWP)
 - The application provides limited information to demonstrate compliance with the EfWP, including but not limited to:
 - Details of the proposed Cement Australia and Boral receival facilities and ability to accept the waste and its specifications.
 - Additional information on the potential halogenated substances contained in the RDF.
 - Breakdown of potential contaminants expected to existing in the bio-mass and RDF based on similar operations / facilities (can be international examples)
- Provide the maximum quantity of biomass to be stored on site at any given time. The EIS suggests in some parts that the biomass would be stored in covered bins, but in other parts it is suggested waste would be stockpiled (refer to figure 15.1). Please clarify.
 - How will biomass and RDF be transferred to the covered holding bays?
- How will contaminants be removed to a level appropriate for the reuse of the biomass for EfW.
 - Does Bioelektra have data from other facilities detailing the expected contaminate load in the biomass (as a %) including if any halogenated substances are present?
- Provide the location of all proposed receival facilities for segregated wastes.

3. Traffic

- Provide a breakdown of the truck types expected to load and unload waste including type and maximum amount accessing the site each day.
- Provide how the expected light and heavy vehicle trips were estimated? Was this based on the expected tonnage per truck? If so, provide a breakdown of average loads based on truck type in a table.

4. Water

- The residual wastes to be sent to landfill are proposed to be stockpiled in the holding bays. Would any leachate be created in this area and how would this be managed?
- **Wastewater**
 - Provide a more detailed description of the proposed wastewater treatment plant and process.
 - What is the capacity of the wastewater treatment plant and how has this been sized based on the expected volumes?
 - What is the capacity of the processed wastewater holding tanks? How often would these tanks need to be pumped out?
 - What contingencies are proposed in the event that the SBR is not functioning?

5. Contamination

- Provide the intended control measures to address potential landfill gas risks during construction and operation, as the Preliminary Site Investigation has identified the risk to be moderate to high.
- Provide details regarding the results of landfill gas monitoring for the adjacent landfill to better understand the likelihood of landfill gas migration.