

Our ref: PN1742040  
Contact: Peter Malloy

7 September 2015

NSW Planning & Environment  
Infrastructure and Industry Assessments  
GPO Box 39  
**SYDNEY NSW 2001**

*Attn: Sally Munk*

Dear Madam

**Re: Proposed modification to Berrima Cement Works – Use of Waste Derived Fuels  
(DA 401-11-2002 MOD 9)**

Thank you for advising Wingecarribee Shire Council that Boral Cement Limited has lodged a modification application and accompanying environmental assessment with the Department of Planning and Environment seeking to modify its existing development consent for the Berrima Cement Works, involving:

- Use of Solid Waste Derived Fuel as an energy source
- Changes to air emission limits of particulate matter, nitrous oxides and volatile organic compounds
- Minor changes to emissions reporting for volatile organic compounds and nitrogen oxides; and
- Construction and operation of a fuel storage and kiln feeding system.

In response to your request to review the Environmental Assessment accompanying the proposed modification, it is requested that the NSW Department of Planning and Environment have regard to the following comments in its assessment of the modification application:

## **1. Environment and Sustainability**

The Wingecarribee Shire Community Strategic Plan 2031 represents the community vision for a healthy and productive community that nurtures our environment. Council acknowledges that the project would contribute to alternatives to fossil fuels, potentially reduce greenhouse gas emissions and contributes to the local economy, however the proposal also has the potential to adversely impact local communities in terms of air quality, noise impacts and increases in rail transport and road traffic.

Therefore Council requests the Department of Planning and Environment to consider in its assessment of the modification application:

- maintaining air quality with increased emission limits,
- minimising noise impacts during construction and operation and
- increases in rail transport and road traffic for transport of fuel to site, and the cumulative impact when considered with other proposals in the area (including the draft mine plan outlined by Hume Coal).

In addition Council requests the Department of Planning and Environment to consider in its assessment of the modification application:

- Whether changing the reporting of nitrogen oxides from one hour averaging periods, to 24 hour averaging is appropriate, and the significance of impacts from a potential increase in the number, and or scale of guideline level exceedances,
- Whether the proposal demonstrates international best practice when the assessment shows Boral cannot meet the nitrogen oxides emission requirements outlined in the NSW Energy from Waste Policy. It is thought the applicant should be encouraged to continue to investigate new technology/best practice to reduce nitrogen oxides levels to the current NSW Energy from Waste Policy requirements.

It is requested that should the proposed modification be approved, additional conditions be imposed to ensure operations use best practice technology in line with the NSW Energy from Waste Policy, that the operation consistently meet permissible emission limits, and that management plans outlined in the environmental assessment are to be implemented to reduce impacts during construction.

It is also requested that should the proposed modification be approved, additional conditions be imposed to include a management plan for communicating and public consultation in line NSW Energy from Waste Policy to demonstrate an ongoing commitment to transparent community engagement during the initial stages of the project construction and operation. The management plan should include specific public reporting requirements and commitments, and request that Council be included as an interested party to receive related reports and submissions.

## **2. Traffic**

The Traffic Impact Assessment (TIA) for the subject proposal, prepared by TRAFFIX – Traffic & Transport Planners Ref. No. 14.443r01v3 Boral Cement Works, New Berrima, dated 24 November 2014, has been reviewed. The reported impacts appear to be quite modest and would indicate that the offset road impacts in the TIA are appropriate:

- “Paying a road maintenance levy to Council of 4 cents/tonne/km for the waste derived fuels.”
- “Surrendering the coal stockpiling for sale modification (MOD 6) that was approved on 20 June 2012.”

Based on the information provided the expected traffic impacts appear to be modest and would be within the normal variation expected in an industrial operation of the size of Boral Cement Works. However, Council requests the Department of Planning and Environment to consider in its assessment of the modification application the following:

- As the base information relies heavily upon advice provided by Boral Cement Works to the TIA author and have not been substantiated, it is recommended that tube classifiers be placed across both access roads into Boral Cement Works (located off Taylor Avenue) and that all vehicle classes be counted and reported for further consideration. It is recommended that the counters record, 24 hours per day, at least 1 month's activity on the access roads to identify average (or "typical"), higher than average, and the frequency of those high activity periods.
- Pre and post development of the performance of the two existing access roads servicing the Boral Cement Works off Taylor Avenue should be assessed to ensure that post development will not adversely affect the performance of Taylor Avenue due to the strategic importance of Taylor Avenue as the main access road servicing the Moss Vale Enterprise Corridor, Moss Vale and surrounds. It is recommended that analyses be undertaken using SIDRA.
- It is suggested that the base data be verified, as the TIA states several times that various existing and proposed activities "is understood" as the base information was provided by Boral Cement Works and the source of that information has not been provided. As such, the accuracy of the base information cannot be ascertained and the projected volumes cannot be verified as traffic generation for this activity is not available.
- It is advised in the TIA that the increase in truck movements will result in an additional 20 truck movements over a 12 hour weekday period and 10 truck movements over a 6 hour Saturday period. The estimation has been determined from an "understanding" of information provided to TRAFFIX by Boral Cement Works that occurs on a "typical transport day".
- It is not stated in the TIA the frequency of when volumes exceed "typical" movements nor what those higher volumes would be. Records or surveys using tube classifiers placed across the access driveways to the Boral Cement Works, over at least a month, would provide data that could identify the frequency of higher than "typical" volumes and it is recommended that surveys, using tube classifiers, and analysis of the raw data of the survey (e.g. MetroCount data file) be undertaken to provide detailed and unbiased data. This would provide a more suitable basis for assessment of the likely impacts of this proposal. The TIA advises that the existing truck movements are 297 movements per day or 24.8 per hour (week day) and 90 movements per day or 15.0 per hour (Saturday).
- Post the change to using waste derived fuels, the proposed truck movements have been estimated to be 317 movements per day or 26.4 per hour (week day) and 100 movements per day or 16.7 movements per hour (Saturday). This accounts for a proposed reduction in the use of coal and the replacement with waste derived fuels which is not as dense as the coal and accounts for the increased truck movements.
- Tube counts placed across the access roads would provide actual total generation from the existing Boral Cement Works. The data would then provide vehicle classification volumes, which could then be compared against the information provided by Boral Cement Works and also enable assessment of the operating conditions at the Boral Cement works access intersections. It is recommended that

the peak period volumes (including consideration of peak flows on Taylor Avenue) at the two access intersections be analysed using SIDRA, noting that the TIA does not provide any comment on the existing or proposed intersection performance or delays.

- The information provided cannot be used to assess the existing performance of the Boral Cement access driveway intersections with Taylor Avenue which needs to be checked to ensure that these will perform at a satisfactory level of service post development. This evaluation is considered justified as Taylor Avenue provides the main road access for industrial and all other traffic between the Hume Highway, Moss Vale Enterprise Corridor and the Moss Vale town centre and surrounds.
- The TIA also advises that at post development, staff levels would be maintained at approximately 150 staff at the Berrima Cement Works (i.e. this would maintain journey to work/home at current levels). Maintenance of existing staff levels would not increase traffic generation for that activity, however, the existing movements need to be considered in the analysis of the intersections and need to be identified and included in the assessment.
- Pre and post development volumes should be shown on a diagram, including the turning and through movements at each access intersection to assist clarity. All vehicle class movements and volumes should be included and identified on the diagram. Generally this would be provided for the AM and PM peak hour, however, should the peak occur outside of these periods, the actual peak should be shown and assessed.
- The TIA advises that tube counts were placed across Taylor Avenue (MR372) between Sydney Street and Melbourne Street (Boral Cement Works traffic cannot be identified). Council's nearest traffic data is located on Berrima Road (north of Douglas Road) and this count, taken in May 2012, shows 3426 – 5 day average (17.0% trucks) and 2448 vehicles per day Saturday (6.0% trucks).
- The base traffic counts for Taylor Avenue included in the TIA appear consistent with Council's counts, given that traffic can also use Berrima Road (local road to Berrima) heading north at the intersection of Berrima Road and Taylor Avenue. The existing traffic volume on Taylor Avenue (which is a Classified Regional Road – MR 372 and not a local road as stated in the TIA) is reported to be 2795 per day (5 day average) and 1866 per day (Saturday), including 767 trucks (or 27.4%) week day and 632 trucks (Saturday).
- The TIA advises that it is understood that "all cement works truck accesses New Berrima area via the Hume Highway". This would mean that no existing trucks would need to travel toward the Moss Vale town centre, as such there would not be any impact on local roads as road between the Boral Cement Works and the Hume Highway are Classified Regional Roads.

It is requested that the NSW Department of Planning and Environment have regard to the above comments in its assessment of the modification application, and should you have any queries, please contact Peter Malloy at the Moss Vale office on (02) 4868 0888.

Yours sincerely

A handwritten signature in black ink, appearing to be 'P. Malloy', written over the printed name.

Peter Malloy  
**Senior Town Planner**  
**Planning Development & Regulatory Services**