

DOC18/379888  
05\_0120 MOD 8

Ms Joanna Bakopanos  
Team Leader  
Department of Planning and Environment  
320 Pitt Street  
SYDNEY NSW 2000

Attention: Olivia Hirst

Dear Ms Bakopanos

**Re: Modification to the Orora Paper Mill, Matraville (05\_0120 MOD 8)**

I refer to your letter received by the NSW Environment Protection Authority (EPA) on 8 June 2018 seeking comments on the exhibition of the Modification Request for the Orora Limited (Orora) Paper Mill at 1891 Botany Road, Matraville (the premises). The proposed redevelopment is a State Significant Development under section 4.36 of the *Environmental Planning and Assessment Act 1979*.

The EPA notes that this modification relates to the demolition and removal of the B7 Reel Store building and ancillary structures, including two smaller ancillary buildings adjacent, which currently buffer operational noise impacts on nearby sensitive receivers. The EPA notes that in order to prevent adverse impacts on its neighbours from operational noise following the removal of the B7 Reel Store building, Orora proposes to continue extending the existing container noise barrier along the north-eastern boundary of the premises.

The EPA has reviewed the Statement of Environmental Effects (SEEs) and other supporting documents to assist the Department of Planning and Environment (DPE) with its assessment of the proposal, and it provides the following comments below.

- EPA notes that the removal of the B7 Reel Store Building may result in the short-term exceedance of noise management levels at nearby sensitive receivers, particularly during the demolition phase. EPA acknowledges that no complaints were received during the demolition of B7 Building, and that reasonable mitigation measures – as currently detailed in Appendix E of the SEEs – will be implemented by Orora where necessary.
- No excavations or disturbance of soils is proposed as the slab foundation will mostly be retained following demolition works. EPA notes that the dismantling of some structural elements may remove part of the slab, exposing the soils beneath, and that the exposed soils will be backfilled with 'crushed concrete'. Where recovered aggregate materials are received by Orora, it must meet the conditions of the Resource Recovery Exemption under Part 9, Clauses 91 and 92 of the *Protection of the Environment Operations (Waste) Regulation 2014* (the recovered

aggregate exemption 2014). The EPA requests additional information regarding the source of the 'crushed concrete'.

- The EPA notes the potential reuse of bricks and/or other materials generated during the demolition phase, where 'economically feasible'. It is likely that crushing and grinding of demolition materials would be required to enable its reuse, and therefore this activity may trigger Clause 16 (crushing, grinding or separating) under Schedule 1 of the *Protection of the Environment Operations Act 1997*. The EPA requests additional information regarding the foreseeable quantity of demolition materials to be reused.
- Given its former association with potential contaminants (e.g. asbestos), a validation assessment may be required for any recovered demolition materials proposed for reuse. EPA may therefore include a special condition in Orora's Environment Protection Licence (EPL no. 1594) to undertake an assessment to validate the demolition material to determine whether it is appropriate for reuse.

If you have any further questions regarding our response, please contact Rajesh Mottey on 9995 6563.

Yours sincerely



**ERIN BARKER**  
Unit Head - Sydney Industry  
NSW Environment Protection Authority