Planning, Industry & Environment

Mr Timothy Baillie
Director16 Kerr Road
Ingleburn
Sydney New South Wales 2565

Dear Mr Baillie

Ingleburn Resource Recovery Facility (SSD 8593)
Response to Submissions

The exhibition of the development application including the Environmental Impact Statement (EIS) for the above proposal ended on 10 Jul 2019. All submissions received by the Department during the exhibition of the proposal are available on the Department's website at www.planningportal.nsw.gov.au/major-projects/projects.

The Department requires that you provide a response to the issues raised in those submissions, in accordance with clause 85A(2) of the *Environmental Planning and Assessment Regulation 2000*. Please provide a response to the issues raised in these submissions (RTS) by Monday, 21 October 2019. In addition, it is also requested you address the issues raised by the Department in Attachment 1.

The Department is also awaiting submissions from Campbelltown City Council, Fire and Rescue NSW, Department of Industry and additional comments from the Environment Protection Authority. Once we have received these submissions we will forward them to you.

Note that under clause 113(7) of the *Environmental Planning and Assessment Regulation 2000*, the days occurring between the date of this letter and the date on which your response to submissions is received by the Secretary are not included in the deemed refusal period.

The Department requests your draft RTS is initially emailed and not uploaded onto the Major Projects website. The Department may reject the RTS, if the Department and agencies are not satisfied the issues have been addressed in the RTS.

If you have any questions, please contact Susan Fox, who can be contacted on 9274 6466 at susan.fox@planning.nsw.gov.au.

Yours sincerely

19/07/19.

Kelly McNicol
Team Leader, Industry Assessments
as delegate for the Secretary

Attachment 1: Additional Information

Waste Management Processing

Hazardous soils

- Page 26 of the EIS identifies hazardous soils will be processed at the site. Provide details on the hazardous soils proposed to be treated or processed.
- Provide a detailed description of the treatment process to be used to treat the hazardous soils.
- Provide details on whether the treatment of hazardous soils will be automated or manually operated.
- The EIS did not provide any detail on the pollution control equipment that will be used to capture emissions or discharges from the treatment of hazardous soil. Provide details on the pollution control equipment proposed to capture or mitigate air emissions or discharges.
- Provide details of the dimensions of the stockpile bays where the hazardous soils will be stored.
- Provide details on the immobilisation approval(s)required to treat the hazardous soils.
- Page 26 of the EIS states the treated hazardous soil will be tested. Provide details on what the treated soils will be tested for, details of soil testing be tested by a National Association of Testing Authorities (NATA) accredited laboratory and the testing regime.
- Provide details on where the treated soil will be stored while awaiting the test results.
- Provide details on how long the treatment process on the length of time of time it would take to treat the hazardous soils.
- Provide details on how the hazardous soils will be managed if there are delays in the treatment process or testing process.

Acid Sulphate Soils (ASS)

- Provide a detailed description of the treatment process to be used to treat the ASS.
- Provide details on whether the treatment process will be automated or manually treated.
- Provide details on the pollution control equipment needed to prevent emissions or discharges while treating the ASS.
- Figure 10 of the EIS provides a flow diagram of the treatment process, it appears the treatment process will use the same machinery. Provide details on how cross contamination of hazardous soils and ASS will be prevented.
- Provide details on how leachate from the ASS will be managed in the stockpile storage bays.
- Provide a timeframe of the ASS treatment process.
- It does not appear the site has adequate space to treat ASS, provide a justification on whether the site has adequate space to treat ASS.

Liquid Waste Treatment

- Page 31 of the EIS states that liquid wastes will be sample for verification. Provide details on the liquid waste will be tested for.
- Provide details on how the liquid waste will be managed to ensure incompatible liquid wastes are not stored in the same storage tanks
- Provide details on the pollution control equipment that will be used to prevent and/or capture emissions from the storage tanks.
- Page 31 of the EIS identifies solids will be separated from the liquid waste and then piped to the dissolved air flotation system. Provide details on how solids will be pumped and provide details on how blockages from pumping solid waste will be prevented.
- Provide details on whether the treatment and processing of the liquid waste is automated or manually operated.

- Provide details on whether the storage tanks contain high level alarms to prevent overflows.
- Provide details on the current and proposed bunding to capture any spills from the liquid waste tanks.

Mud Plant and Filter Press

- Provide detail on how sand, soil and sediment captured through the treatment of muddy liquid waste would be suitable for reuse.
- Provide details on where the filter cakes be stored while awaiting information on the suitability of the filter cakes for reuse
- Provide details on how it would be determined that the treated water would be reused for concrete batching or be discharged under the existing Trade Waste Agreement.

Liquid Containing Asbestos

- Provide details on how asbestos dust fibres from the filter cake be managed once pressed into a filter cake
- Provide a waste classification of the filter cake.
- It noted that the process equipment that would be used to treat the liquid containing asbestos would be used for other treatment processes. Provide details on how cross contamination will be managed.
- Provide details on the cleaning regime that would be applied to cleaning the tank containing the liquid containing asbestos.
- Provide details on the treatment and processing of the liquid containing asbestos has been used in Australia or overseas.
- Provide details on the capacity of the cake bin.

Construction and Demolition (C&D) Waste

- Provide details on the tip and spread area and provide clarification on the receivals area
- Provide a justification as to why the loading and unloading of wastes at the C&D facility will be carried out externally. Provide details on how noise and dust will be managed from this area
- Based on the site diagrams it does not appear the receivals area has enough space to store waste and tip and spread in accordance with the "Standards for Managing Construction and Demolition Waste in NSW". Provide details on how C&D waste will be managed in accordance with these Guidelines.
- The "Saleable Material" stockpiles appear to be undersized relative to the amount of incoming waste. Provide details on how waste will be managed and details on the tonnages, throughput and dispatching of waste
- The EIS identified that the waste stockpiles would be below 6.5 m. What will the proposed stockpile height be and provide a justification for the proposed stockpile height.
- The "Saleable Material" stockpiles appear to be difficult to access, provide details on how machinery and heavy vehicles will access these stockpiles.
- Provide details on how long it would take to unload a truck, spread it out and then move it to the designated stockpiles.
- Provide details on what pollution control equipment will be used to managed dust from the crushing plant
- Provide details on whether the roller door will be closed or open during operation

Product Destruction

- Describe the products and its waste classification
- Describe what the packaging is?

- Section 4.8 of the EIS states the product will be put through a shredder or crusher dependant on packaging material. Provide further details on this process.
- Figure 21 of the EIS identifies where the location of where the products will be stored prior to separation. Provide details on how the product will be stored
- Section 4.8 of the EIS identifies the liquid product will be put through a filter to capture any solids such as glass before being transported off site for soil injection. Provide details on the classification of the liquid and provide detail of where the liquid waste will be transported off site for soil injection .ection 4.8 of the EIS describes the remaining material will be processed to remove residues via a spray bar on a conveyor. Provide details of where the spray bar is and what the spray bar does.

Concrete Batching Plant

- Figure 20 of the EIS provides a flow chart of the concrete batching process, however the EIS does not described the concrete batching plant process is. Provide a detailed description of the concrete batching process.
- Provide detailed description of what the upgrade of the concrete batching plant.
- Provide detailed description of how the concrete blocks are manufactured.
- Provide details how recovered materials will be used to manufacture the concrete blocks.

Waste

- Table 5, page 18 of the EIS lists the typical quantities of waste types accepted at the site. The wastes listed under Material Group doesn't match the proposed waste types listed in Table 4. Provide a more detailed quantities table with proposed daily, weekly and annual outputs.
- The inspection protocol only deals with asbestos. Provide details about other non-conforming wastes.

Hazards

- Following a review of Appendix I of the EIS, The Department does not consider the preliminary risk screening has been undertaken in accordance with the Department's Applying SEPP 33. Primarily:
    - the screening does not include the quantities of all dangerous goods associated with the proposed development. The screening did not include the quantities of sulphuric acid and caustic soda (referred to in page 31 of the EIS). both are known to be DG.
    - the screening did not consider the DG transport screening thresholds. As such, the EIS does not satisfy the hazards SEARs.
- Page 20 of the EIS did not include sufficient information processes which may involve the use of DG such as the reaction tank and x3 neutralisation pits.
- Drawing BRSLS-001R2 of EIS and Appendix M identifies a neutralisation process with 2x 25kL mixers which may be connected to scrubbers/filters/absorbers.
- Provide a revised preliminary risk screening (DG transport inclusive), including and not being limited by the following information:

1. clear indication of class, quantity and location (site diagram) of all dangerous goods and hazardous materials associated with the SSD, including any raw materials or reagents associated with all waste processing or water treatment operations;
2. clear description all processes (neutralisation, reaction tank, etc.) associated with the SSD involving the storage and handling of dangerous goods;
3. clear indication on the capacity and location of all storage or processing tanks and storage areas for dangerous goods;
4. clear description of the safeguards (scrubbers, filters, alarms, etc.) to be implemented for processes involving the storage and handling of dangerous goods;

5. clear verification that DG Class 3 flammable goods tanks and combustible liquid tanks associated with the SSD can comply with AS 1940:2017 The storage and handling of flammable and combustible liquids (AS 1940).
6. clear indication and confirmation that the diesel fuel station (13 kL of C1 combustible liquid) will be sufficiently segregated (i.e. outside of bund and considering AS 1940) from any areas associated with the storage and handling of DG Class 3 combustible liquids.

- If the preliminary risk screening indicates that the proposed development is potentially hazardous, a preliminary hazard analysis (PHA) prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis' and Multi-level Risk Assessment must be submitted.

Site Access, Manoeuvrability and Parking

- "Proposed Site Plan" (180009 – Site 02, Rev. F) shows a vehicle queuing behind the outward weighbridge. A truck would be unable to safely exit if this queuing space is occupied. Provide details on how trucks can exit with a truck located in this "Que In" space.
- There appears to be only enough space for one truck to queue behind the weighbridge. Additional space for queuing is required to ensure no impact on the road. Provide details of the weighbridge wait times for heavy vehicles and how heavy vehicles will be managed to prevent queuing on Kerr Road
- Provide a heavy vehicle stacking plan that indicates the proposed areas for trucks to wait (tack) on site and the number of heavy vehicles that could be sacked onsite at one time without impacting the manoeuvring of vehicles
- Provide a timestep analysis showing the maximum number of heavy vehicles that would be onsite during peak period.
- Section 4.2.1 of the EIS suggests that at the weighbridge, a worker would inspect the top of each load from an elevated inspection point or by using a video camera. Provide details of where the elevated inspection point is located.
- Provide details of where the weighbridge operator/waste inspector would be located.
- There is no analysis of weighbridge and inspection operations and resulting queuing during peak periods for the facility. Provide procedures to ensure no queuing in the road occurs if four trucks arrive at once.
- The temporary storage area (solid materials, skip bins and solids for transfers) and staff parking area appears to be located in the heavy vehicle turning path for B double, articulated vehicle paths and mud waste and smaller trucks. Provide details on how heavy vehicle will be managed and updated plans that show that heavy vehicle safely manoeuvre within the site and the relocation of the receivals area.
- The parking bays appear to be in very close proximity to the vehicle turning path for the concrete agitator. Provide details of how heavy vehicles can safely manoeuvre within the site and not conflict with staff parking.
- The TIA does no assess onsite manoeuvring provide turning path diagrams of all on-site truck manoeuvring is required including:
    - accessing and loading and unloading all stockpiles on the site
    - Front end loaders manoeuvring in and out of the building through the roller doors
    - truck manoeuvring in and out of the "loading" area at the eastern corner of the site
    - trucks manoeuvring in the south-east side of the building
    - trucks manoeuvring in and out of the Concrete plant area and still allow trucks to enter the shed
- The TIA identifies the average load of vehicles is 20 tonnes which seems high compared to other similar facilities. Provide further details on average load for different waste types.
- The EIS identified that it would take 10 minutes for a vehicle to unload waste. Provide details of how long it takes for vehicles with different waste types to unload an unload.
- The Transport Management Plan indicated that Campbelltown DCP requires 41 car parking spaces at the site. Provide updated site plans with appropriate number of parking spaces.

- Provide details on the onsite on road pavement.
- Provide details on expected numbers of vehicles accessing on-site vehicle parking

Traffic

- The TIA averages out truck movements. Waste facilities have peak hours which represent the worst-case scenario. Update the TIA to include the worst-case scenario.
- The TIA does not indicate if the sites AM/PM peak will coincide with the AM/PM peak period of Ingleburn traffic. Update the TIA to include the AM/PM peak period times.
- The TIA did not identify what are the haulage load numbers based on. Provide clarification on whether the haulage numbers were based on the existing weighbridge data.

Air quality

- The AQIA does not consider adjacent industrial uses as receivers. Update the AQIA to include industrial receivers.
- The AQIA does not consider potential emission sources including those that could be generated from the treatment of liquid waste and hazardous soils waste Update the AQIA to include potential emissions sources and update the modelling to identify potential impacts on industrial and residential receivers.
- The modelling has not considered if roller doors for the warehouse will be open or shut C&D processing. Provide clarification on whether the modelling took into consideration the building design and whether doors will be open or closed during operation.
- The EIS has not considered how dust will be managed from the crushing plant including whether a bag house would be required to manage dust from the crushing plant.

Noise

- The site plan used in the NIA is not site plan in the EIS. Update the NIA to ensure the site plan in the EIS is used.
- Update the NIA to ensure the roller door have not indicated whether the roller doors will be open or shut in the modelling.
- The proposed extension of the noise wall impact the flow of water at the existing easement
- It does not appear the NIA considered a 3 am start time for the concrete batching plan. Update the modelling to assess potential impacts for the proposed 3 am start up times.
- exceedances of the residential receivers' during construction period were identified in the NIA, provide details on whether the proposed the proposed management/mitigation management measures would reduce noise during construction.

Water Management

- There are several existing easements on the site which restrict the use of external areas. The proposal includes the stockpiling of waste within the easement for the overland flow of water, construction of push walls, the extension of a noise wall and the construction of an awning which will impeded the flow of water. Can these structures be legally constructed on the easement?
- The Water Management Plan and Water Balance (Appendix B) does not model or discuss water quality including potential contaminants of concern. The proposal does not include separate leachate collection for external stockpiles and stormwater systems. Therefore, contaminants from the waste stockpiles are directed to the stormwater system. How leachate or dirty water be managed on site to prevent pollution of waters?
- Provide a characterisation of water run-off from the stockpiles is provided, taking into account the stockpiles are located in an overland flow path.
- The Water Management Plan does not discuss the impacts of the proposal on the overland flow of water.

- Where is the OSD tanks proposed?

Fire Management

- Provide details on whether the site is capable of capturing fire water if in the event of a fire
- Provide detail on whether the drains can be manually or automatically shut to prevent firewater from leaving the site
- The Fire Management Plan does not appear to cover the proposed awning or the C&D facility or external plant.
- The EIS does not assess the proposal against FRNSW's draft "Fire Safety in Waste Facilities" Guideline

General

- Provide a detailed description of current operations and any pollution control equipment used to managed noise, air and water impacts
- Provide details on current and future employees Including proposed number of jobs to be created during construction and operation.
- Provide details on whether employees will be on shift work
- Provide an update on any development applications that are currently with Council for assessment and how they will impact this development if not approved.

Plans

- Adequate plans for the awning have not been provided. No indication of the location of the footings and supports has been provided. The location of the footings and supports could impact manoeuvring on site.
- The proposed noise barrier appears to be within the easement for a gas pipeline. Can this legally occur?
- The "Proposed Site Plan" (180009 – Site 02, Rev. F) does not contain a legend for the Easements.
- The South East Elevation includes the water towers, but the site plan has them shown as being removed.

Independent Audit

- An Independent Audit is required as per the SEAR's requirements.