

Appendix A: Submissions Received by BRS



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

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. Section 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 BRSL-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 not 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.

DOC19/499596

Mr Kelly McNicol
Team Leader, Industry Assessments
Department of Planning, Industry and Environment
Via email: information@planning.nsw.gov.au

Attention: Ms Susan Fox

10 July 2019

Dear Mr McNicol

Bulk Recovery Solutions Pty Ltd – Ingleburn Facility – SSD 8593

I refer to the email dated 7 June 2019 from Jessica Fountain to the Environment Protection Authority (EPA) regarding the notice of exhibition for the Ingleburn Resource Recovery Facility under SSD8593 (Proposal).

We are unable to undertake a detailed assessment of the Proposal and therefore cannot support the Proposal in its current form as the proponent has not sufficiently addressed a number of requirements:

- A detailed assessment and related flow diagram for *each waste stream* which the proponent has nominated in the EIS (Table 4 – Proposed Waste Types) has not been provided as required in section B.b) of EPA SEARS.
- We have identified a number of waste types proposed to be received by the proponent that have the potential to generate odour which are not addressed in the odour source inventory of the Air Quality Impact Assessment (Table 6-3). As per the Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales, the AQIA report should be revised to include:
 - A detailed list of all process inputs and outputs that could give rise to odours
 - Plans, process flow diagrams and descriptions that clearly identify and explain all pollution control equipment and techniques for all processes on the premises
 - A description of all aspects of the air emission control system, with particular regard to any fugitive emission capture systems
 - The operational parameters of all emission sources, including all operational variability, i.e. location, release type (stack, volume or area) and release parameters (e.g. emission concentration and rate)
 - An updated odour emissions inventory that includes a detailed discussion of the methodology used to calculate the expected odour emission rates for each source and detailed calculations of odour emission rates for each source. All potential odour sources should be included in these calculations.

- A number of the plans submitted by the proponent detailing vehicular movement within the site show vehicle paths directly through the nominated receivals area for solid waste. We require further information detailing how the proponent will meet the EPA's minimum standards for managing construction waste in NSW, given the limited space available.
- We have concerns that the proposed methodology for the treatment of asbestos containing liquids may not adequately remove all asbestos fibres prior to discharge to sewer. Further information about this process and any associated testing is required. The proponent should also ensure that discharge of this material to sewer is covered by the trade waste agreement with Sydney Water.
- During a meeting with the proponent on 12 September 2017, the EPA expressed the need to ensure that outgoing waste types meet EPA Resource Recovery Orders (RRO). There is no indication from the proponent in the Proposal that indicates that outgoing waste types will meet the RRO's as required.

The EPA will be in a better position to recommend conditions for project approval once sufficient information is provided as detailed above.

If you have any questions about this matter, please contact Matthew Davidson on (02) 4224 4104.

Yours sincerely



MEGAN WHELAN
Unit Head Waste Compliance
Environment Protection Authority



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Mr Kelly McNicol
Team Leader, Industry Assessments
Department of Planning, Industry and Environment
Via email: information@planning.nsw.gov.au

Attention: Ms Susan Fox

16 August 2018

Dear Mr Nichol

Bulk Recovery Solutions Pty Ltd – Ingleburn Facility – SSD 8593
Additional comments – EPA Air and Noise Technical Advice

I refer to our letter to Mr Kelly McNicol, dated 10 July 2019, regarding the notice of exhibition for the Ingleburn Resource Recovery Facility under SSD 8593 (the Proposal).

As discussed with Ms Susan Fox, we have now received advice from both EPA Technical Advice Air and EPA Technical Advice Noise in relation to the Proposal. Please find attached the EPA's additional comments in relation to the Noise Impact Assessment and Air Quality Impact Assessment provided by the proponent.

If you have any questions about this matter, please contact Matthew Davidson on (02) 4224 4104.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Roberto Pupo', with a stylized flourish extending to the right.

ROBERTO PUPO
Acting/Unit Head Waste Compliance
Environment Protection Authority

Attachment A

Technical Advice Noise

The EPA's Technical Advice Noise Unit (TANU) has reviewed the following in relation to the Proposal:

- *Noise Impact Assessment Bulk Recovery Solutions Pty Ltd Resource Recovery Facility Ingleburn, NSW dated 23 October 2018, Muller Acoustic Consulting Pty Ltd, reference: MAC170598RP1V01 Final (noise report)*
- *Environmental Impact Statement for State Significant Development Proposed Expansion of Resource Recovery Facility 16 Kerr Road Ingleburn NSW 2655, dated 22 May 2019, KDC Pty Ltd, reference: 16183_EIS_Ingleburn_BRS_May2019 (EIS report)*

Based on this review, TANU provided the following advice:

The noise report does not provide sufficient detail to allow TANU to fully evaluate the adequacy of the noise assessment. This includes inconsistencies with information presented in other parts of the application.

The following matters must be addressed on the operational, traffic and construction noise assessments before the EPA can recommend conditions for project approval.

Operational noise assessment

The noise report has not provided sufficient detail on the operational assumptions used in the noise predictions and some information appears to be inconsistent with other parts of the application. The proponent should provide more information as follows:

- Clarification of the site layout as the site plan in the noise report is currently inconsistent with the rest of the application.
- Clarification of the operational activities assessed during the day, evening and night periods and confirmation that they are consistent with planned operations.
- Location, height and operating durations of noise sources for each day, evening and night scenario.
- Clarification of the truck and concrete agitator numbers used in the noise report as they currently appear inconsistent with the rest of the application.
- Details of the assumptions regarding mobile noise sources present on the site, including light vehicles, truck movements, truck tipping/dumping, queuing and on-site speed limits.
- Details of assumptions used to calculate the breakout noise from buildings including roller doors being open or closed and assumed sound reduction of building materials.
- Validating and providing appropriate references for plant sound power levels; in particular for the truck and dog tipping which appears to be the same as the truck and dog manoeuvring.
- Noise contour maps to illustrate noise propagation from the premises at surrounding noise-sensitive receivers.
- Justification or reference for the maximum sound power level of L_{max} 102 dBA used in the sleep disturbance assessment, which is less than the $L_{eq,15min}$ level for several of the plant proposed to operate during the night.

- Details and results of the model calibration exercise.
- Details of how the existing conditions from the premises' Environment Protection Licence (No. 20797) have been considered in the noise report.
- Proposed and existing noise management measures for activities that occur during the day, evening and night period. This should include how noise emissions were considered in the building and premises layout design, consideration of tonal reversing alarms and how operations are managed adjacent to the noise wall to enable efficient operation.
- The coordinates of some receivers in Table 2 of the noise report do not match the locations shown in Figure 1.

It is also noted that predictions in the noise report are dependent on a 6.5 metre noise barrier on the southwest and southeast boundaries and a restriction on the location of the slump stands. The performance of the noise barrier is a critical component to achieve the predicted noise levels. The noise barrier should therefore form part of any approval conditions if the application is approved.

Road noise assessment

- The vehicle trip information used in the noise report is not consistent with predicted traffic numbers in the rest of the application. The proponent should review the assumptions and update the noise report accordingly.
- Light vehicles should be considered in the traffic noise assessment.
- Road traffic noise criteria should be applied according to Section 3.4.1 of the Road Noise Policy (DECCW, 2013) and the Road Noise Policy Application Notes. The assessment criteria are applicable to the total traffic noise, not just the premises contribution.

Construction noise assessment

Further information is required on the construction noise assessment as follows:

- Details of the assumptions made regarding the noise predictions, including the insertion loss of any barriers and location of sources.
- The predicted construction noise calculations appear to have underestimated the noise level at the nearest receivers. The noise report predicts a noise level of $L_{eq,15min}$ 40 dBA at R01 from a source of sound power level 108 dBA at approximately 60m. Even considering a well performing barrier, this calculation appears to be an underestimate and should be reviewed.

Attachment B

Technical Advice Air

The EPA's Technical Advice Air (TA-Air) reviewed the following in relation to the Proposal:

- *Todoroski Air Sciences Air Quality Impact Assessment (AQIA)*

Based on this review, TA-Air have identified the following inadequacies and information deficiencies with the odour assessment undertaken in the AQIA and provided the following recommendations:

Potential for odour not adequately assessed

- i. The only potential odour sources, identified in the AQIA for the proposal, are from the stockpiling of foundry sand from the dissolved air floatation (DAF) treatment of liquid waste and the DAF system. It is proposed to process waste types that may have odour generating potential such as sewage sludge, grease trap oil, industrial waste water and waste oil and these waste types should be considered in the assessment. Adequate justification for omitting all odour sources except for DAF and foundry sand has not been provided.
- ii. Mitigation measures proposed to minimise the generation of odour from the identified odour sources include blending of foundry sand with other materials to dilute the material and the use of charcoal filters within the DAF process. However, the AQIA is lacking:
 - Plans, process flow diagrams and descriptions that clearly identify and explain all pollution control equipment and techniques for all processes on the premises
 - A description of all aspects of the air emission control system, with particular regard to any fugitive emission capture systems (e.g. hooding, ducting), treatment systems (e.g. scrubbers, bag filters) and discharge systems (e.g. stacks)
 - The operational parameters of all emission sources, including likely operational variability
 - It has not been established how the proposed mitigation measure will be used to effectively minimise emissions from all potential odour sources at the premises
- iii. Adequate justification for the adopted odour emission rates has not been provided. The odour concentration and emission rates adopted in the AQIA have been sourced from existing reports and publicly available data. It has not been adequately established how the odour emission data adopted in the AQIA is relevant to this project. Where emission data is sourced from publicly available literature (including previous assessments), the data must be adequately justified, including reference to the original test data and provision of the original test data report.
- iv. It has not been established if the adopted odour emission rates represent a reasonable worst case, and account for expected emission rate variability. The odour emission rate should reflect reasonable worst case and account for foreseeable variability in process. Additionally, the AQIA should include:
 - A detailed discussion of the methodology used to calculate the odour emission rates
 - Detailed calculations of pollutant emission rates for each source
 - All release parameters of stack and fugitive sources

Recommendation: TA-Air recommend the AQIA be revised to address the identified inadequacies i to iv listed above.

Emissions from solid waste processing

The solid waste processing at the project involves the crushing, screening and blending of materials to generate desired products. It is proposed that solid waste processing and raw material stockpiling is to occur within an enclosed space with water misting sprays applied to suppress dust within the building.

Only finished products are proposed to be stockpiled in outdoor areas in external storage bays. Water will be used to mitigate dust emissions and minimise wind generated dust emissions from this source.

Stockpiling of waste and processed material will occur on the south eastern area of the building in designated bays. It is intended that trucks will tip the waste at the 'receivals area' for distribution by front end loader to the stockpile bays. Smaller stockpile areas are located internally at the crushing plant and undercover at the screening plant.

Waste material arriving and being processed on site will comprise of a variety of waste types including building and demolition waste, foundry sand, reclaimed asphalt, hazardous soils, slag and fly ash. These waste types may contain non-trivial levels of contaminants materials including but not limited to Type 1 and Type 2 Substances (metals). However, the assessment has only considered dust emissions from the premises.

The AQIA should consider the potential for any air pollutants likely to be emitted from the various materials that will be delivered, stored and processed at the facility.

Recommendation: TA-Air recommend the AQIA be revised to include assessment of all air pollutants, including slag and fly ash (constituents), emitted from each source at the premises.

Maximum Daily Production Rates

The proposed masonry facility is assumed to operate 24 hours, 365 days per year and this has been reflected in the dispersion model. The emission rates adopted in the AQIA are based on emission factors referenced from emission estimation technique manuals and production throughputs.

However, it has not been described how the production throughput has been averaged. As such, it is unclear if the emission rates adopted in the AQIA reflect maximum daily activity rates and hence peak emission rates.

As detailed in the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (Approved Methods), a detailed discussion of the methodology used to calculate the expected pollutant emission rates for each source should be provided.

Additionally, if no data is available to describe the distribution of emission rates, the maximum measured or calculated emission rate should be used. Maximum daily rates should be calculated based on the maximum achievable daily processing rate for the facility, opposed to a daily average rate.

Recommendation: TA-Air recommend the AQIA be revised based on maximum proposed daily processing rates based on the facilities design. A detailed discussion of the method used to calculate the emission rates should also be provided.

12 August 2019

Ms Susan Fox
Industry Assessments
Department of Planning, Industry and Environment.
GPO Box 39
SYDNEY NSW 2001

By email: susan.fox@planning.nsw.gov.au

Dear Ms Fox,

**Re: SSD 8593 - Proposed expansion of an existing resource recovery facility
No. 16 Kerr Road, INGLEBURN**

Thank you for referring the subject application to Campbelltown Council for comment.

As part of preparing this response, Council's officers have reviewed the information supplied with the application and have visited the site.

Council understands that the proposal is to increase the permitted tonnage of waste processed at the site per annum from just under 30,000 tonnes to 225,000 tonnes. To facilitate this increase, there would also be some physical changes to buildings and surrounds as well as the operations undertaken on site.

The following comments are provided to assist the Department with its assessment:

Traffic and Operational Issues

It is noted that the two existing weighbridges on site are within 20 metres of the Kerr Road cul-de-sac. As part of the increased storage and processing capacity of the plant, it is considered likely that a number of additional incoming loads would be delivered by truck and 'dog' tipper trailers and, as this vehicle configuration is up to 19 metres in length, would only allow one of these trucks to queue directly behind the entry to either weighbridge. As a result, there is a risk of vehicles queuing on Kerr Road, which may inhibit vehicle manoeuvring through the cul-de-sac.

There also appears to be some conflict on submitted drawings showing either both or one of the weighbridges as being used for incoming weigh-in, rather than outgoing. Clarification from the applicant on the entry/exit procedure should be sought. Council understands that vehicles need to be weighed both in and out; as such there appears to be potential for conflict with the queuing proposed. Should only one weighbridge be used for incoming

vehicles in order to facilitate more orderly ingress/egress of vehicles, there is likely to be greater potential for vehicle queuing in Kerr Road, which is not a desirable outcome.

Council would also recommend further investigation/information be provided on the proponent's means for delivering materials inside the building, noting the size of the vehicles shown on drawings and the size/location of proposed stockpiles. Of particular interest is the means of loading/unloading at the hazardous AAS soils location. Reliance on a single medium rigid vehicle operating internal to the building does not appear to reflect regular operations at this and other similar waste recovery facilities and is not consistent with the pre-dominant transport vehicle for this type of waste, being the 'truck and dog' tipper.

Previous assessments by Council and the Sydney West Joint Regional Planning Panel had encouraged and approved internal loading/unloading of materials that have a propensity to create dust and noise. It is recommended that the Department consult conditions of 'deferred commencement' consent 1113/2013/DA-DE at the site, which required internal only loading and unloading of waste at the site.

Section 4.1.1 of the EIS includes a table listing all the waste streams to be accepted on site including, among other items, virgin excavated natural material (VENM), building and demolition waste, soil, asphalt, garden waste, bulky goods waste, street sweepings, grits/sediments collected from stormwater management systems, office and packaging waste, hazardous soils and cured concrete waste.

By nature, some of these materials will be delivered as pre-sorted loads, (i.e. entire loads of VENM, building and demolition waste and/or material etc.). Given the unloading area proposed, all deposited waste would need to be cleared from the discharge area prior to the next vehicle's delivery to prevent cross-contamination of these waste streams. This may delay unloading, resulting in reduced inbound vehicle movements per hour and increased potential for queues to form in Kerr Road. More information should be provided to explain how the proponent proposes to maintain the integrity of each pre-separated waste stream. This is especially important for VENM, and other categories of contaminating wastes, where avoidance of cross-contamination is imperative.

Licensing requirements for the EPA are also likely to stipulate an inspection regime for incoming loads. Further details on where this would take place (with a view to reducing queuing potential) should be provided by the proponent.

In order to accurately review the potential traffic impacts of the development, Council recommends that the proponent be requested to produce weighbridge data for the past 12 months in order to gain a more accurate view of traffic movements at the site – including (but not limited to) typical vehicle size/mass and typical time spent at the site loading or unloading.

Environmental Issues

Council recommends that further investigative works or information be provided in relation to the migration of airborne dust emanating from the premises travelling from the site – either by air or by deposit on roads and in local stormwater systems.

The SEARs include a requirement for a *"risk assessment of the potential environmental impacts of the development . . ."*, and *"a description of the measures that would be*

implemented to avoid, minimise and if necessary, offset the potential impacts of the development, including proposals for adaptive management and/or contingency plans to manage any significant risks to the environment" and, in respect of air quality and odour, "details of proposed mitigation, management and monitoring measures".

As mentioned earlier, it is Council's position that (ideally) incoming waste would be deposited and sorted internally to minimise the transfer of noise and dust from the site.

If this is not practical (although it appears possible on the 'proposed site plan' that through routing of vehicles inside the building could be undertaken), it is recommended that all areas of the site where waste is to be stored and/or loaded, unloaded and relocated are to have misting systems installed which must always remain operational for dust suppression purposes.

Environmental Operations Management Plan

An overarching management plan that details the site's operations and provides detailed information regarding the means by which methods and equipment would be employed at the site to reduce its potential impacts on the local environment does not appear to have been provided with the application.

This all-encompassing plan would 'tie in' the operations and environmental outcomes described in consultant reports provided with the application. Council recommends that the Department pursue submission of such a plan at this stage of its assessment as a means to ensure that the range of reports provided and operational management details either provided or implied are accounted for.

Suggested requirements that the plan should include are (but are not limited to):

- Identification of all statutory and other obligations that the proponent is required to fulfil in relation to operation of the facility, including all consents, licences, approvals and consultations
- A description of the roles and responsibilities for all relevant employees involved in the operation of the facility
- Overall environmental policies and principles to be applied to the operation of the facility
- Standards and performance measures to be applied to the facility, and a means by which environmental performance can be periodically reviewed and improved, and
- Management policies to ensure that environmental performance goals are met and to comply with the conditions of this consent.

Flooding

Council advises that the subject property is a Flood Control Lot with respect to 1% Annual Exceedance Probability (AEP) flood due to overland flow through the 30m wide easements on the northern and eastern sides of the property.

This property is also affected by overland flow through the cul-de-sac head of Kerr Road, where another drainage easement runs parallel to the adjacent property (15 Kerr Road). The

weighbridges and site shed/office are currently located in this easement and are relied upon in the subject application. This appears to contradict a restriction on the land's title.

The proposed stock piles and associated bay walls and receivals area is within the 30m wide easement for drainage of water. These would have an impact on flood behaviour and potentially an adverse impact on neighbouring properties. The stockpiled materials and sump water are also likely to be mobilised in a storm event, potentially creating a detrimental impact on water quality. The stockpile and receivals areas must not be located within these easements. Works and storage in these areas appear to contravene a restriction on the land's title, which notes that 'no building, erection of structure, excavation, filling or alteration of surface levels is permitted.'

The finished goods bays which are located on the common boundary of the subject property with 14 Kerr Rd are considered likely to have a significant impact on flood behaviour. Council has undertaken modelling and determined that these works are likely to cause an increase in flooding on the upstream property (up to 200mm in the 20% AEP Event, and an additional 100mm in the 1% AEP Event), which is considered unacceptable.

With these matters in mind, it appears that operations across the site need to be reconsidered by the proponent. At the least, further detailed information and modelling on water control across the site must be provided by the proponent should the current site operations wish to be pursued as the easements to drain water are heavily relied upon for storage and other integral components of the development.

Council is able to provide further information in relation to site flooding to assist the Department should it request such.

Compliance with existing approved plans and the Building Code of Australia

Council's review of the 'approved site plan' provided with the subject application notes some inconsistencies with the most recent development consent (as modified) issued for the site (Council ref. 948/2015/DA-I, modification B). The 'approved site plan' appears to be missing required landscaping, particularly along the northern boundary. The setback of the wheel wash bay from the 'approved site plan' and Council's approved plan are also not consistent. Council's development control plan requires landscaping within boundaries of industrial sites to soften their appearance and enhance streetscapes.

The office space inside the building nominated on the 'approved site plan' is currently subject to separate investigation by Council. Further investigation may also need to be undertaken regarding the building's status as a 'fire isolated building' pursuant to the Building Code of Australia and the implications this has for structures (tanks) and bulk storage areas that are located on the southern and eastern sides.

Conclusion

The application exhibits a number of logistical challenges having regard to the constraints of the site. These constraints include its size, the floor plan of the existing buildings and the restrictions on land use on all sides of the building for either flooding or fire access purposes.

Council is concerned that not enough information has been provided in some key areas, including site operation and flooding to fully demonstrate the site's potential to cater for such

a tonnage increase. Until this information is provided, there is limited certainty regarding opportunity to minimise development impact on existing nearby residents and other industrial neighbours.

I trust that this assists your assessment of the proposal.

Thank you again for the opportunity to comment on the ~~subject~~ state significant development proposal and I apologise for the delay in sending this response to you.

If you require any further information please contact me on (02) 4645 4616.

Yours Sincerely

A handwritten signature in black ink, appearing to be 'Fletcher Rayner', with a long horizontal stroke extending to the right.

Fletcher Rayner
Executive Manager
Urban Release and Engagement



File Ref. No: FRN17/1693 BFS19/1948 (8000007803)
 TRIM Doc. No: D19/43146
 Contact: Senior Firefighter Arthur Brown

20 June 2019

The Department of Planning & Environment
 C/- Kelly McNicol
 Industry Assessments
 GPO Box 39
 SYDNEY NSW 2001

E: kelly.mcnicol@planning.nsw.gov.au

Dear Ms McNicol

**Environmental Impact Statement (EIS)
 Ingleburn Resource Recovery Facility (SSD 8593)
 16 Kerr Road, Ingleburn
 Lot 16 DP 717203**

I refer to the above development proposal's Notice of Exhibition. Fire & Rescue NSW (FRNSW) have reviewed the EIS documents and the following comments and recommendations are submitted to the NSW Department of Planning & Environment (the Department) for consideration.

Overview

Due to the processes undertaken at resource recovery facilities, it is FRNSW experience that the frequency of recycling facility fires is greater in comparison to other industries. In addition, the fire hazards associated with stockpiled recyclable material directly correlate to the:

- The volume of the stockpile and potential fire magnitude,
- The life safety risk to firefighters and employees,
- The environmental risks to the local and surrounding areas, and
- The potential structural damage to buildings, other structures and plant.

The potential fire size is the primary factor that FRNSW considers when determining the level of resources required to be deployed to safely and efficiently control and extinguish fires at these facilities and to mitigate any environmental risk resulting from the fire.



Recent recycling industry fire incidents have resulted in several large fires that required the deployment of large numbers of FRNSW resources. To ensure safe resolution of these incidents FRNSW personnel and equipment have been required to remain in attendance at the fire ground for more than 12 hours. The long duration of recent fire incidents is primarily attributable to '*special problems of firefighting*' that either existed prior to the fire or have arisen during the incident.

Note: The term 'special problems of firefighting' is used in Clause E1.10 of the National Construction Code (NCC).

In relation to the recycling industry, it is FRNSW experience that 'special problems of firefighting' are primarily related to the following aspects:

1. Inappropriate stockpile sizes (i.e. pile area, height and total volume).
2. Insufficient separation of stockpiles (which hinders first responder vehicle access and increases the likelihood of fire expansion).
3. The capacity of the fire hydrant system and its water supply is insufficient for the fire load kept on site.
4. Buildings are often not served by a sprinkler system.
5. Buildings not usually provided with smoke hazard management systems that facilitate safe firefighting operations.
6. On-site provisions to contain contaminated fire water runoff are not usually in place.

Application of Clause E1.10 of the NCC

It is FRNSW experience that the above matters are not usually adequately addressed by typical application of the NCC by certifying authorities. It is FRNSW expectation that due to the special problems of firefighting associated with such facilities (N.b. due to the nature, type and quantity of the materials stored on the allotment and/or the building) that Clauses E1.10 and E2.3 of the NCC should be satisfied.

The NCC Deemed-to-Satisfy Provisions (DtS) do not specify what 'suitable additional provisions' can be applied to prescriptively satisfy Clause E1.10 and E2.3. Consequently, it is FRNSW opinion that the lack of prescriptive guidance is intended to ensure that in each instance where Clauses E1.10 and E2.3 are deemed applicable, the development should be assessed on its merits. We highlight that FRNSW opinion is consistent with the guidance and clarification detailed in the 'Guide to Volume One of the NCC'.

It is also FRNSW opinion that where Clauses E1.10 and E2.3 of the NCC are applicable, that the suitable additional provisions should be developed in consultation with the relevant fire agency having statutory responsibility for extinguishing fires which, in this instance, is FRNSW (i.e. pursuant to Section 6 of the Fire Brigades Act 1989). This is because the effectiveness of any suitable additional provisions must be adequate to mitigate any special problems of firefighting that are identified.

Special problems of firefighting should, due to their specific nature, be identified by the relevant fire service. The relevant fire service will be familiar with their agencies

operational capabilities and limitations and have substantial experience in relation to problems that are unique to and associated with resource recovery developments. Further, it is FRNSW experience that the imposition of Clauses E1.10 and E2.3 of the NCC upon developments by certifying authorities is infrequent.

Recommendation/s

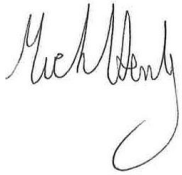
Should development consent be granted, that the following condition form part of the instrument of consent:

- a) That Clauses E1.10 and E2.3 of Volume One of the National Construction Code (NCC) be complied with to the satisfaction of FRNSW. In particular, that the following aspects of the development be assessed and appropriately addressed:
 - i) That stockpile storage within any building and/or open yard storage on the allotment be limited in size and volume and arranged to minimise the likelihood of fire spread.
 - ii) That the arrangement of stockpiles of combustible material, stored externally, on the allotment be sufficiently separated to permit Fire & Rescue NSW (FRNSW) vehicle access between stockpiles.
 - iii) That the site is served by a fire hydrant system that has a minimum water supply capability appropriate to the site's largest stockpile's fire load.
 - iv) That significant buildings used to process recyclable material are provided with a smoke hazard management system that facilitates Fire & Rescue NSW (FRNSW) firefighting operations.
 - v) If deemed necessary, by virtue of applying Clauses E1.10 and E2.3 to the development, that any significant building used to process recyclable material is provided with an appropriate automatic fire suppression system.
 - vi) That the site be provided with an effective means to contain an appropriate volume of contaminated fire water runoff. The capacity of containment to be commensurate with the concurrent discharge rate of the facility's hydraulic fire systems.

Should the recommended condition be imposed, please be assured that FRNSW will engage constructively with the proponent (and their consultants) to expeditiously address the matters raised above.

For further information please contact Arthur Brown of the Fire Safety Command Liaison Unit, referencing FRNSW file number BFS19/1948. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Michael Henly', with a stylized flourish at the end.

Superintendent Michael Henly
Manager
Fire Safety Infrastructure Unit



OUT19/7655

Susan Fox
Senior Environmental Assessment Officer
Planning and Assessment Group
NSW Department of Planning, Industry and Environment

susan.fox@planning.nsw.gov.au

Dear Ms Fox

**Ingleburn Resource Recovery Facility (SSD 8593)
EIS Exhibition**

I refer to your email of 7th June 2019 to the Department of Planning, Industry and Environment (DPIE) – Lands, Water and Department of Primary Industries (DPI) about the above matter.

The department has reviewed the proposal and has no comments.

Any further referrals to DPIE – Lands, Water and DPI can be sent by email to:
landuse.enquiries@dpi.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Francis'.

Simon Francis
Senior Project Officer, Assessments
DPIE Water – Strategic Relations
9th August 2019



1 July 2019

Our Reference: SYD17/01173/03
DP&E Ref: SSD 8593

Team Leader
Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: **Susan Fox**

Dear Sir/Madam

**INGLEBURN RESOURCE RECOVERY FACILITY
16 KERR ROAD, INGLEBURN**

Reference is made to your correspondence regarding the Development Application for the Ingleburn Resource Recovery Facility.

Roads and Maritime has reviewed the submitted information and notes that the EIS has addressed the issues adequately. Roads and Maritime has no comments for the Department to consider in the determination of the development application.

Any inquiries in relation to this Application can be directed to the undersigned on 8849 2219 or development.sydney@rms.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Pahee Rathan'.

Pahee Rathan
**Senior Land Use Assessment Coordinator
North West Precinct**

18th July 2019

Our Ref: 179894

Mr Kelly McNicol
Team Leader, Industry Assessments
Department of Planning & Environment
GPO Box 39 Sydney 2001

RE: Ingleburn Resource Recovery Facility (SSD 8593)

Dear Mr McNicol,

Thank you for notifying Sydney Water of the proposed increase in the processing capacity of an existing resource recovery facility which includes: increasing the volumes of waste that can be processed on site from 30,000tpa to 225,000tpa of liquid and solid waste, store up to 30,000t of waste, vary waste types that can be accepted on site, solid waste processing, liquid waste processing including oily water, grease, sewer, silt and debris, solid and liquid waste transfer, 24-hour operation of liquid and muddy waste processes, extended operation of batching from 3am and upgrade of approved concrete batching equipment with continued production of approved 50,000tpa. We have reviewed the application based on the information supplied and provide the following comments to assist in planning the servicing needs of the proposed development.

Water Servicing

- The existing drinking water infrastructure in the area has capacity to service the proposed development.

Wastewater Servicing

- The existing waste water infrastructure in the area has capacity to service the proposed development.

Trade Waste

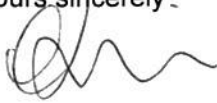
- The applicant may require an updated consent to discharge trade wastewater from Sydney Water.

This advice is not a formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications will be provided once the development is referred to Sydney Water for a Section 73 application.

The developer will need to engage a Water Servicing Coordinator (WSC). The WSC will be the applicant's point of contact with Sydney Water. The WSC can answer most questions the applicant might have on Sydney Water's developer process and charges. For a list of authorised Coordinators, either visit www.sydneywater.com.au > Plumbing, building & developing > Developing > Providers > Lists or call 13 20 92.

Further advice and requirements for this proposal are in the attachments. If you require any further information, please contact the Enrique Sarthou of Growth Planning on 02 88496496 or email urbangrowth@sydneywater.com.au

Yours sincerely,



Cassie Loughlin
Manager, Growth Planning

Attachment 1

Sydney Water Servicing

A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water.

The proponent is advised to make an early application for the certificate, as there may be water and wastewater pipes to be built that can take some time. This can also impact on other services and buildings, driveways or landscape designs.

Applications must be made through an authorised Water Servicing Coordinator. For help either visit www.sydneywater.com.au > Plumbing, building and developing > Developing > Land development or telephone 13 20 92.

Building Plan Approval

The approved plans must be submitted to the Sydney Water [Tap in™](#) online service to determine whether the development will affect any Sydney Water sewer or water main, stormwater drains and/or easement, and if further requirements need to be met.

The Sydney Water [Tap in™](#) online self-service replaces our Quick Check Agents as of 30 November 2015.

The [Tap in™](#) service provides 24/7 access to a range of services, including:

- building plan approvals
- connection and disconnection approvals
- diagrams
- trade waste approvals
- pressure information
- water meter installations
- pressure boosting and pump approvals
- changes to an existing service or asset, e.g. relocating or moving an asset.

Sydney Water's [Tap in™](#) online service is available at:

<https://www.sydneywater.com.au/SW/plumbing-building-developing/building/sydney-water-tap-in/index.htm>

Attachment 2

Requirements for **Business Customers for Commercial and Industrial Property Developments.**

Trade Wastewater Requirements

If this development is going to generate trade wastewater, the property owner must submit an application requesting permission to discharge trade wastewater to Sydney Water's sewerage system. You must obtain Sydney Water approval for this permit before any business activities can commence. It is illegal to discharge Trade Wastewater into the Sydney Water sewerage system without permission.

The permit application should be emailed to Sydney Water's Business Customer Services at businesscustomers@sydneywater.com.au

A Boundary Trap is required for all developments that discharge trade wastewater where arrestors and special units are installed for trade wastewater pre-treatment.

If the property development is for Industrial operations, the wastewater may discharge into a sewerage area that is subject to wastewater reuse. Find out from Business Customer Services if this is applicable to your development.

Backflow Prevention Requirements

Backflow is when there is unintentional flow of water in the wrong direction from a potentially polluted source into the drinking water supply.

All properties connected to Sydney Water's supply must install a testable Backflow Prevention Containment Device appropriate to the property's hazard rating. Property with a high or medium hazard rating must have the backflow prevention containment device tested annually. Properties identified as having a low hazard rating must install a non-testable device, as a minimum.

Separate hydrant and sprinkler fire services on non-residential properties, require the installation of a testable double check detector assembly. The device is to be located at the boundary of the property.

Before you install a backflow prevention device:

1. Get your hydraulic consultant or plumber to check the available water pressure versus the property's required pressure and flow requirements.
2. Conduct a site assessment to confirm the hazard rating of the property and its services. Contact PIAS at NSW Fair Trading on 1300 889 099.

For installation you will need to engage a licensed plumber with backflow accreditation who can be found on the Sydney Water website:

<http://www.sydneywater.com.au/Plumbing/BackflowPrevention/>

Water Efficiency Recommendations

Water is our most precious resource and every customer can play a role in its conservation. By working together with Sydney Water, business customers are able to reduce their water consumption. This will help your business save money, improve productivity and protect the environment.

Some water efficiency measures that can be easily implemented in your business are:

- Install water efficiency fixtures to help increase your water efficiency, refer to WELS (Water Efficiency Labelling and Standards (WELS) Scheme, <http://www.waterrating.gov.au/>
- Consider installing rainwater tanks to capture rainwater runoff, and reusing it, where cost effective. Refer to <http://www.sydneywater.com.au/Water4Life/InYourBusiness/RWTCalculator.cfm>
- Install water-monitoring devices on your meter to identify water usage patterns and leaks.
- Develop a water efficiency plan for your business.

It is cheaper to install water efficiency appliances while you are developing than retrofitting them later.

Contingency Plan Recommendations

Under Sydney Water's [customer contract](#) Sydney Water aims to provide Business Customers with a continuous supply of clean water at a minimum pressure of 15meters head at the main tap. This is equivalent to 146.8kpa or 21.29psi to meet reasonable business usage needs.

Sometimes Sydney Water may need to interrupt, postpone or limit the supply of water services to your property for maintenance or other reasons. These interruptions can be planned or unplanned.

Water supply is critical to some businesses and Sydney Water will treat vulnerable customers, such as hospitals, as a high priority.

Have you thought about a contingency plan for your business? Your Business Customer Representative will help you to develop a plan that is tailored to your business and minimises productivity losses in the event of a water service disruption.

For further information please visit the Sydney Water website at:

<http://www.sydneywater.com.au/OurSystemsandOperations/TradeWaste/> or contact Business Customer Services on 1300 985 227 or businesscustomers@sydneywater.com.au.



Mr Timothy Baillie
Director
Bulk Recovery Solutions
16 Kerr Road
Ingleburn NSW 2565

3 April 2020

Dear Mr Baillie

**Ingleburn Resource Recovery Facility (SSD-8593)
Review of Response to Submissions Report**

I am writing in relation to the Response to Submissions (RtS) report received by the Department of Planning, Industry and Environment (the Department) on 6 February 2020 and my subsequent telephone conversation with Kale Langford and Patrick Quinlan of KDC on 23 March 2020.

The Department has reviewed the RtS report and requires additional information to enable further assessment (see Attachment 1). While it is acknowledged some waste processing activities have been removed from the proposed development, the Department considers the space available within the building appears not adequate to allow five different activities. In addition, the Department is concerned about the lack of detail provided about each of the proposed activities and notes that many of the original on-site access, manoeuvrability and safety concerns remain.

The Department requires the Applicant to consider removing more waste processes from the development application and requests a teleconference at your earliest convenience to discuss these matters further. If possible, your engineer/specialist should be present at this meeting to provide detailed information on the asbestos-containing liquid refining process.

To arrange a teleconference, please contact Susan Fox on (02) 9274 6466 or via email susan.fox@planning.nsw.gov.au

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Sheelagh Laguna'.

Sheelagh Laguna
Acting Team Leader
Industry Assessments

ATTACHMENT 1

GENERAL

Waste

1. Provide tonnages (throughput and storage) of all waste types (including liquid waste and hazardous soils) entering and exiting the site (both liquid and solid waste).
2. Ensure the process flow diagrams for all waste processing activities provided in the RTS are reflective of the described process.

Site Plans

1. The following items should be clearly shown and labelled on the site plan:
 - a. noise wall including length and height of existing and proposed
 - b. all roller doors
 - c. all operations/activities
 - d. the drainage bund surrounding the new solid waste receivals area/C&D tip and spread area
 - e. the items in the process flow diagram in the RTS (Figure 3), being the homogeniser, weight feeder liquid reagents, dry reagent feeder, dry reagent silos and the location of the curing settling of treated waste pending disposal
 - f. the designated loading area for hazardous soil and ASS
 - g. the liquid tank for each liquid waste type
 - h. the C&D waste validation area
 - i. concrete batching plant, including the new enclosure, two new silos for cement and sand, load cell, aggregate feeder, mixer hopper, swing in hopper
 - j. the dedicated equipment for asbestos contaminated liquid waste, including labelling all components as listed in Table 11 in the EIS
 - k. the on-site laboratory
 - l. the filter listed on the flow diagrams for oily liquid waste grease trap waste and sewer waste
 - m. the concrete batching silos silo that would store hazardous waste

PROPOSED WASTE PROCESSING ACTIVITIES

Construction and Demolition (C&D) waste

1. Provide details of:
 - a. where the C&D waste loads would be mixed to form product and how plasterboard would be received, stored and processed
 - b. where the waste validation area would be located
 - c. the types of waste would be stored in the storage bays labelled "feed stockpile", "20 mm", "10 mm" and "dust"
 - d. the C&D crushing plant
 - e. how solid waste material would be transported to internal stockpiles from the processing area

Concrete batching plant

1. Provide details of:
 - a. how the crushed glass used for the concrete batching plant would be managed and stored, including managing the odour and leachate that could be generated from the crushed glass
 - b. how waste from the C&D processing area would be moved internally within the site to be used in the concrete block manufacturing process
 - c. where the 12 different types of recovered materials listed on page 38 of the EIS would be stored within the warehouse when, in the revised site diagrams in the RTS, there are only five bays labelled "soils", "soils", "concrete agg", "road base" and "sand"
 - d. the height of the concrete batching plant and additional machinery including silos

- e. how much cement and sand can be stored in the silos and where the cement and sand are sourced from
- f. what recovered materials are purchased for concrete block manufacturing and where it would be stored
- g. where the concrete and the recovered materials are mixed to form the blocks

Hazardous soils

1. Provide details of:
 - a. all hazardous waste that would be treated on site (including the tonnages of each hazardous waste soil)
 - b. what the hazardous waste soil would be treated for, including details of the liquid reagents that would be added (how much liquid or solid reagent will be added?)
 - c. where the liquid and solid reagent would be stored. Are the liquid and solid reagents classified as dangerous goods? How many tonnes of the solid and liquid reagent would be stored on site at any given time?
 - d. the immobilisation approval required
 - e. the NATA accredited laboratory that would be used to test the hazardous soil
 - f. how cross contamination would be prevented and managed. e.g. contaminated soils and ASS would be using the same pugmill, how will cross contamination be prevented?
2. The EIS states that hazardous soils and fly ash would be stored in the concrete batching silos while the RTS states treated hazardous soils would be disposed of after they had been mixed. Please clarify if they would be stored in the silo after or before treatment and if the silo be dedicated to hazardous waste.
3. Please advise:
 - a. the classification of the immobilised soil and where the immobilised soil waste would be disposed of
 - b. the batch sizes for processing hazardous soils
 - c. the location of the designated loading area for hazardous soils and ASS, the lime storage area for ASS treatment, and the treated soil and ASS storage area
 - d. how much treated and untreated hazardous soil and ASS the bunds can hold (in tonnes and at any one time)
 - e. how leachate from the bund within the designated area would be collected and directed to the liquid waste treatment process for treatment
 - f. how leachate from the bunded area would be managed to prevent contamination of the liquid waste treatment process
 - g. the relationship between the filter cake process and the treatment of hazardous soils and include this process in Figure 3 of the RtS
 - h. what type of heavy vehicle would be used to transport treated ASS and hazardous soils offsite
 - i. where the curing/settling process of treated hazardous soil take place

Liquid Waste Treatment

1. Provide details of:
 - a. what the liquid waste would be tested for
 - b. the inspection/testing procedures for incoming liquid wastes
 - c. the tonnages of each liquid waste stored and treated on site
 - d. what size heavy vehicle would be used to transport liquid waste to and from the site
2. Please advise why TSS measured prior to discharge, how often is the liquid waste tested, and what NATA accredited laboratory would be used to classify/test the liquid waste?
3. From the flow diagram sewage solids use the same filter press as drilling mud. How would it be ensured drilling mud does not become contaminated?
4. How does drilling mud, cement slurry and concrete washout get moved through the sieve, noting this is first in the process description but is not listed on the flow diagram?

5. A filter is listed on the flow diagrams for oily liquid waste grease trap waste and sewer waste. Please describe how this fits into the process.

Drilling mud

1. Provide detail of:
 - a. how the different batches of drilling mud filter cake would be separated to ensure each sampled batch can be identified
 - b. how much drilling mud filter cake can be stored in the bins

ENVIRONMENTAL IMPACTS

Traffic

1. The Department has concerns regarding potential clashes between vehicles during the various waste activities. Provide swept path analysis (SPA) showing:
 - a. two waste liquid vehicles delivering at one time (in accordance with the timestep chart).
 - b. a solid waste heavy vehicle truck passing a solid waste heavy vehicle pickup
 - c. how a heavy vehicle can pass another vehicle while unloading drilling mud or sewage
 - d. the heavy vehicle type that will be used to transport ASS and hazardous soil on and off-site.
 - e. how heavy vehicles will manoeuvre around the tip and spread area
2. It appears from the SPA titled 'TURN04' a heavy vehicle would drive into the 'road base storage bay' in a forward direction then reverse into the building to load/unload liquid waste storage tanks. If trucks are driving into the 'road base storage bay' how would sediment be prevented from being tracked outside the building?
3. Provide details on how the smaller vehicles entering the main building would access the wheel wash
4. It appears the queueing spots are located haphazardly on the SPA, demonstrate how heavy vehicles can safely manoeuvre within the site with eight trucks at maximum peak hour on site with each truck taking approximately 30 minutes to unload.
5. Based on the revised TIA, haulage numbers have been based on truck size not weighbridge records. The means the TIA could have overestimated tonnage and underestimated traffic numbers, please address.

Surface Water Management

1. Please advise:
 - a. how water in the bunded tip and spread area would be removed
 - b. how leachate would be collected from the storage bays
 - c. how firewater would be removed follow shutting of the drain

Fire Management

1. Please describe the fire upgrades undertaken and advise how the waste material stored and processed within various areas of the building has been considered as part of the fire upgrades.
2. Please demonstrate if the site has capacity to hold fire sufficient water.

Noise Assessment

1. Please advise if all vehicles have been considered in the revised noise assessment including liquid waste trucks? Please clarify the number of waste trucks per hour included in the assessment.

Additional Questions

1. Provide details of the onsite laboratory (described in the audit)
2. It appears the on-site landscaping has been removed to allow better movement of vehicles – this has not been previously approved so must be included as part of the of the application.
3. The EIS discusses a proposed second weighbridge but it appears this has already been constructed and is operational. Please confirm if this now needs to be included in this application.

4. Provide details of the approval for site office approved by Council, including DA and site plans
5. Describe the proposed bunker walls and demonstrate that they will be structurally fit for purpose, especially those adjacent to the glass office walls.

HAZARDS

SEPP 33

- It is understood the Applicant has verified which waste materials could be classified as dangerous goods (DG) under the *Australian Dangerous Goods Code* and intends not to store or transport DG (DG waste inclusive) beyond the screening threshold quantities listed in the Department's *Applying SEPP 33*. Therefore, the Applicant concluded only on this basis that the SSD is not potentially hazardous under SEPP 33, thus not requiring a preliminary hazard analysis to be prepared.
 - However, from *Applying SEPP 33* (Appendix 3, Example 2), the Applicant should note that an SSD can be potentially hazardous on the basis of risk factors beyond those covered by the preliminary risk screening. That is, the SSD can be potentially hazardous if there could be an off-site risk due to a combination of hazards even if DG quantities are below the screening threshold quantities. For this SSD, packaged DG would be stored collectively within the Eastern Chemical Bund shown in RTS Appendix F (page 18). Packaged DG includes caustic soda, sulphuric acid and sodium hypochlorite, totalling up to 16,000 L (around 16 tonnes). Spills of these materials into a common bund may release toxic gases such as chlorine and sulphur dioxide which may impact residential developments 80 m from the SSD. This issue is also noted by SafeWork NSW who is the DG regulator.
1. To assess if the SSD is not potentially hazardous, the Applicant must provide enough information on how incompatible materials within the eastern chemical bund would be segregated to prevent the release of toxic gases. If sufficient information is provided, the Department can verify if the SSD is potentially hazardous and condition appropriately.
 2. Information should include but not be limited to the specific storage arrangements within the eastern chemical bund or how the design of the bund itself can comply with the relevant Australian Standards and codes of practice (i.e. it is not sufficient to merely state that the SSD will comply with standards).

Liquid containing asbestos

- Even if the SSD is not potentially hazardous under SEPP 33 and conditions can be applied to prevent the SSD becoming potentially hazardous after approval, the SSD will be storing and handling "liquid containing asbestos" (LCA). In noting NSW EPA's submissions and consulting with SafeWork NSW (asbestos regulator).
- The processing of LCA at the scale proposed in the SSD is not typically encountered in NSW. It is also uncertain if any consent authority in NSW has approved a development which includes LCA processing. As such, it remains uncertain if the method of LCA processing described in the EIS and RTS (i.e. LCA through a simple filter press + HEPA filter) can be designed to comply with all relevant requirements, especially when the LCA could contain various types of asbestos with a range of particle/fibre sizes which can be below 12 microns (respirable range).
- In reviewing the EIS and RTS, the Applicant has not provided sufficient and consistent information to describe LCA processing, including the storage arrangements for the LCA and the products after LCA processing (filter cake). Moreover, the process flow diagram:
 - indicates the use of "HEPA Filter Cartridges" to purify liquids, which is inconsistent with HEPA filtration technology (i.e. HEPA stands for high efficiency particulate air);
 - may indicate the use of a centrifuge in addition to filtration equipment ("Kosun Black Rhino"). This could indicate micron-scale particle/fibre sizes which cannot be separated by conventional filtration technology;
 - indicate mixing solids with LCA processing streams result in solid compounds of unknown properties;

- indicates the use of flocculants as part of LCA processing, which may indicate that “Sludge Tank 1” being operated as a settling tank. In noting that the sludge will pass through “Filter Press 1”, it is uncertain where the supernatant (‘clear’) liquid will go after the settling process;
 - does not clearly indicate how LCA enters the LCA treatment process; and
 - depicts different tank sizes when compared with RTS Appendix (page 18) and other site layout diagrams in the EIS and RTS.
- It is requested that the Applicant’s engineer/specialist provide a detailed run-down on the LCA process to fully resolve the above items. The above items are not an exhaustive list but are the main items to which other items will follow.



DOC20/174759

Industry Assessments
Department of Planning, Industry and Environment
Via email: information@planning.nsw.gov.au

Attention: Ms Susan Fox

6 March 2020

Dear Ms Fox

Bulk Recovery Solutions Pty Ltd – Ingleburn Resource Recovery Facility – SSD 8593

I refer to your email of 12 February 2020 to the Environment Protection Authority (EPA) in which you provided a link to the Response to Submissions Report (RtS) for the proposed Ingleburn Resource Recovery Facility (SSD 8593) and invited comments and advice from the EPA.

The EPA has reviewed the RtS and notes that a number of the EPA's initial concerns have been addressed. There are some outstanding issues, and while some of these can be dealt with through recommended conditions of consent, the EPA is of the view that further information or clarification is required to enable a complete assessment of the application.

Our assessment of the application and RtS has identified some outstanding issues around waste and water management at the site. Further detail about our comments and concerns is provided in Attachment A and B to assist the Department of Planning, Industry and Environment in the project assessment.

Once information addressing the concerns outlined in Attachment A and B is received, the EPA will be in a position to provide you with our consolidated comments and, if appropriate, recommended conditions of consent.

If you have any questions about this matter, please contact Matthew Davidson on 02 4224 4104.

Yours sincerely

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

MEGAN WHELAN
Unit Head Waste Compliance
Environment Protection Authority

Attachment A – Water

The EPA has reviewed the response to submissions document and is of the opinion that the proposal does not provide:

- adequate storage to appropriately manage water quality risks
- sufficient details regarding the proposed water management system
- an assessment of the potential impact of proposed discharges on the environmental values of the receiving waterway.

Recommendations are provided below for additional information to ensure the water quality risks are appropriately assessed and managed.

Water management system

The proposed water management system does not provide adequate storage to manage potential water quality risks.

In particular, the storage for run off from the dirty water capture area will overflow to stormwater after only 17.3mm of rainfall in 24 hours. The Water Management Plan (Appendix B of the *Environmental Impact Statement*) states that under the proposed expansion the number of days the dirty water storage will overtop will increase from the current rate of 20 in 150 years to 1866 in 150 years (representing rainfall of 91.9mm and 17.3mm in 24 hours, respectively). No explanation is provided for this significant decrease in storage capacity.

It appears from maps provided in the *Environmental Impact Statement* and *Applicants Response to Submissions* that the dirty water capture area includes the 'tip and spread' area. The *Applicant's Response to Submissions* indicates that the 'tip and spread' area will be bunded and the runoff water collected but it does not specify where the water will be stored.

The *Water Management Plan (Appendix B of the Environmental Impact Statement)* indicates that dirty water is directed to pavement storage and settling ponds. No settling ponds are indicated on any of the site maps.

It should also be noted that EPA policy is that water pollution should first be avoided. Options to avoid a discharge should first be considered, including increased reuse, discharge to sewer etc.

It is recommended that the applicant demonstrate that all options to avoid or minimise a discharge have been considered and where practical and reasonable, implemented.

It is recommended that the applicant provide sufficient storage to manage any residual water quality risks from the dirty water capture area with reference to relevant guidelines for the storage and management of contaminated water (e.g. Environmental Guidelines: Solid waste landfills (EPA, 2016)). Further detail should also be provided about the significant decrease that occurs in dirty water storage capacity under the proposed expansion of the facility.

It is recommended that the applicant provide a site drainage plan for the premises. This should:

- define site sub-catchment boundaries
- identify 'clean', 'dirty' and 'contaminated runoff' sub-catchments
- identify the location and provide details of all potential water pollution sources including but not limited to 'dirty' water from internal activities and external operational areas
- indicate surface flow directions
- include all water management features including pits, pipes, drains, bunds, storages (including water carts), treatment measures and proposed discharge points.

Discharge impact assessment

Section 45 of the *Protection of Environment Operations Act 1997* sets out the matters the EPA must consider when making licensing decisions, including:

- the pollution caused or likely to be caused by the carrying out of the activity or work concerned and the likely impact of that pollution on the environment
- the practical measures that could be taken to prevent, control, abate or mitigate that pollution, and to protect the environment from harm as a result of that pollution
- in relation to an activity or work that causes, is likely to cause or has caused water pollution the environmental values of water affected by the activity or work, and the practical measures that could be taken to restore or maintain those environmental values.

The *Environmental Impact Statement* and *Applicant's Response to Submissions* do not provide the information required to consider these matters.

There could potentially be a range of pollutants present in runoff from internal activities and the external operational area, including the 'tip and spread' area, that is collected in the dirty water pavement storage. Pollutants that may be present in the dirty water at elevated concentrations could include for example:

- ammonia as a toxicant
- biochemical oxygen demand
- nutrients such as nitrogen and phosphorus
- metals such as chromium, copper and zinc

It appears that runoff from the dirty water areas would be discharged when rainfall of 17.3mm or more is received in 24 hours. Settling in the above ground storage seems to be the only form of treatment the dirty water receives prior to discharge to the stormwater system.

The appropriateness of the treatment cannot be assessed as the *Environmental Impact Statement* and *Applicant's Response to Submissions* do not characterise the quality of the discharges or assess their potential impact on the environmental values of the receiving waterway.

If controlled discharges are required, it is recommended that the applicant provides a discharge impact assessment. This assessment should include details of the measures that have been considered and those proposed to be implemented to minimise discharges of pollutants.

For each proposed discharge point, this assessment should:

- *estimate the expected frequency and volume of discharges*
- *characterise the expected quality of the treated discharges in terms of the typical and maximum concentrations of all pollutants likely to be present at non-trivial levels (this should be based on a risk assessment of the activities and materials on site and the expected performance of the proposed treatment measures)*
- *assess the potential impact of the proposed discharge on the environmental values of the receiving waterway consistent with the national Water Quality Guidelines (ANZG, 2018; including comparison of the predicted water quality to the relevant guideline values for slightly to moderately disturbed ecosystems)*
- *where relevant, identify appropriate measures to mitigate any identified impacts.*

Consistent with the principles of the NSW Water Quality Objectives, the discharge impact assessment should demonstrate that the proposal will maintain the environmental values of the receiving waterway where they are currently being achieved or contribute to restoring the environmental values where they are not currently being achieved.

Attachment B – Waste

The EPA has reviewed the response to submissions document and is of the opinion that further clarification is required in relation to the management of waste, both liquid and solid.

We note that the applicant intends to store up to 15,000 tonnes of waste on site at any one time and process up to 225,000 tonnes per annum. While the proposed amount of waste to be stored on site at any one time has been reduced from what was originally proposed in the *Environmental Impact Statement*, the EPA has concerns that given that all waste will be stored internal to the building, and given the complexity of the proposed vehicular movements inside the building that need to be accounted for, this may not be practically possible.

It is recommended that the applicant demonstrate that the proposed storage capacity of 15,000 tonnes is practical and achievable given the footprint of the building and the proposed site use and layout.

It is recommended that the applicant identify the quantity of waste that can practically be stored in each of the dedicated storage bays or tanks shown on the proposed site layout. This information should then be used to inform the limit of waste able to be stored at the site at any one time.

Susan Fox

From: Nathan Everett <Nathan.Everett@fire.nsw.gov.au>
Sent: Thursday, 12 March 2020 2:30 PM
To: Susan Fox
Cc: John Hawes; Fire Safety
Subject: RE: Response to Submissions - SSD8593 - Ingleburn Resource Recovery Facility (BFS20/403)

Hi Susan,

I've had a look through the RtS and am satisfied that the Applicant has appropriately addressed the relevant comments and recommendations submitted by FRNSW.

In regard to the asbestos contaminated liquid waste (drilling muds and liquids), FRNSW consider that the waste poses minimal risk in regard to a hazardous materials (hazmat) type incident as it is neither friable or readily airborne. It is recommended that the site waste management plan and emergency response plan assess the storage and handling requirements, and implement appropriate controls that give consideration to response actions for both small and large spill incidents. Should a FRNSW hazmat response be required to a large spill, appropriate controls and measures would be implemented by FRNSW incident controllers as part of the mitigation strategy and in accordance with standard operating guidelines.

Please do not hesitate to contact me should you have any queries regarding the above.

Thanks
Nathan

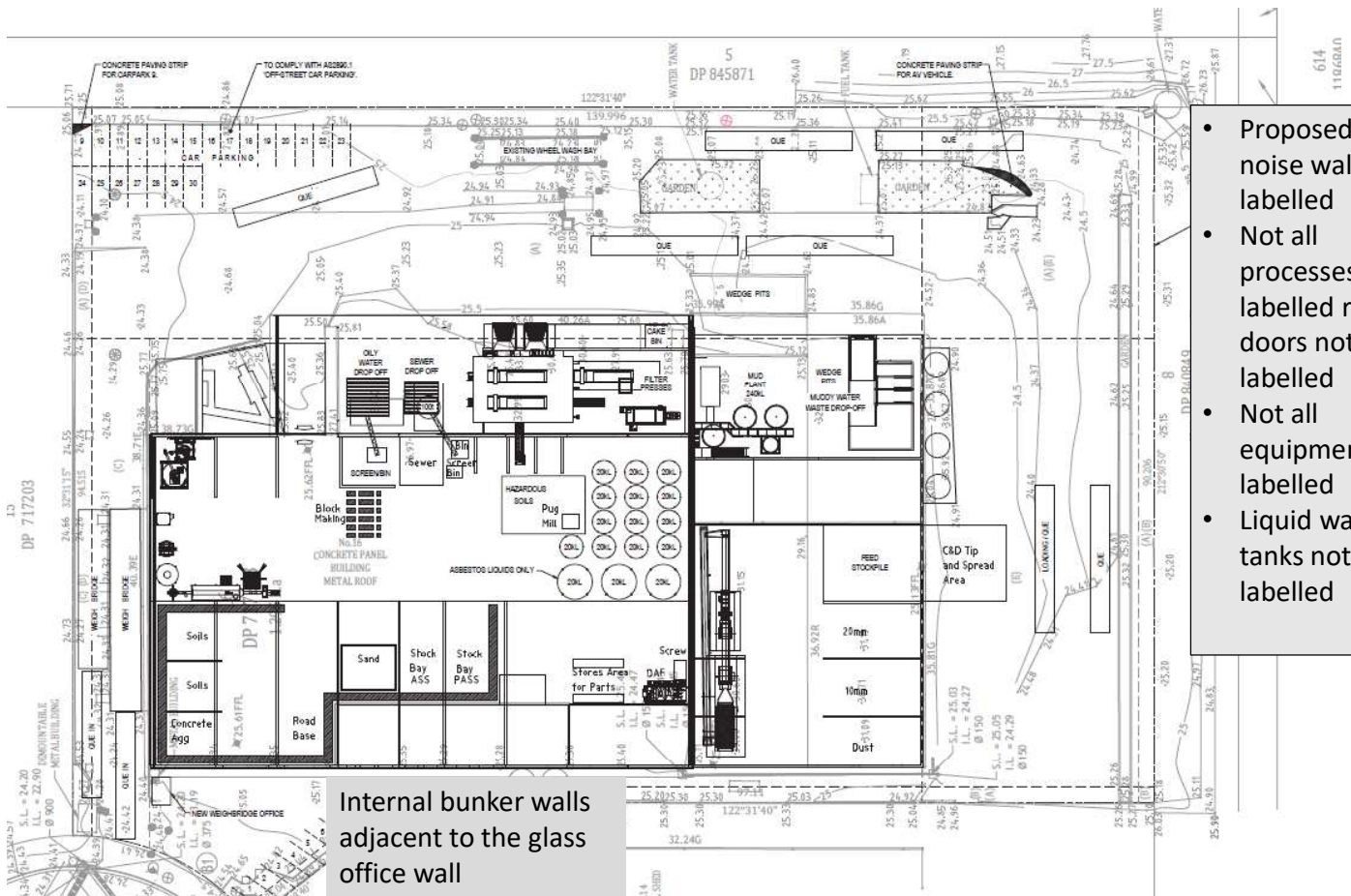


QUALIFIED FIREFIGHTER NATHAN EVERETT

FIRE SAFETY OFFICER
FIRE SAFETY INFRASTRUCTURE LIAISON

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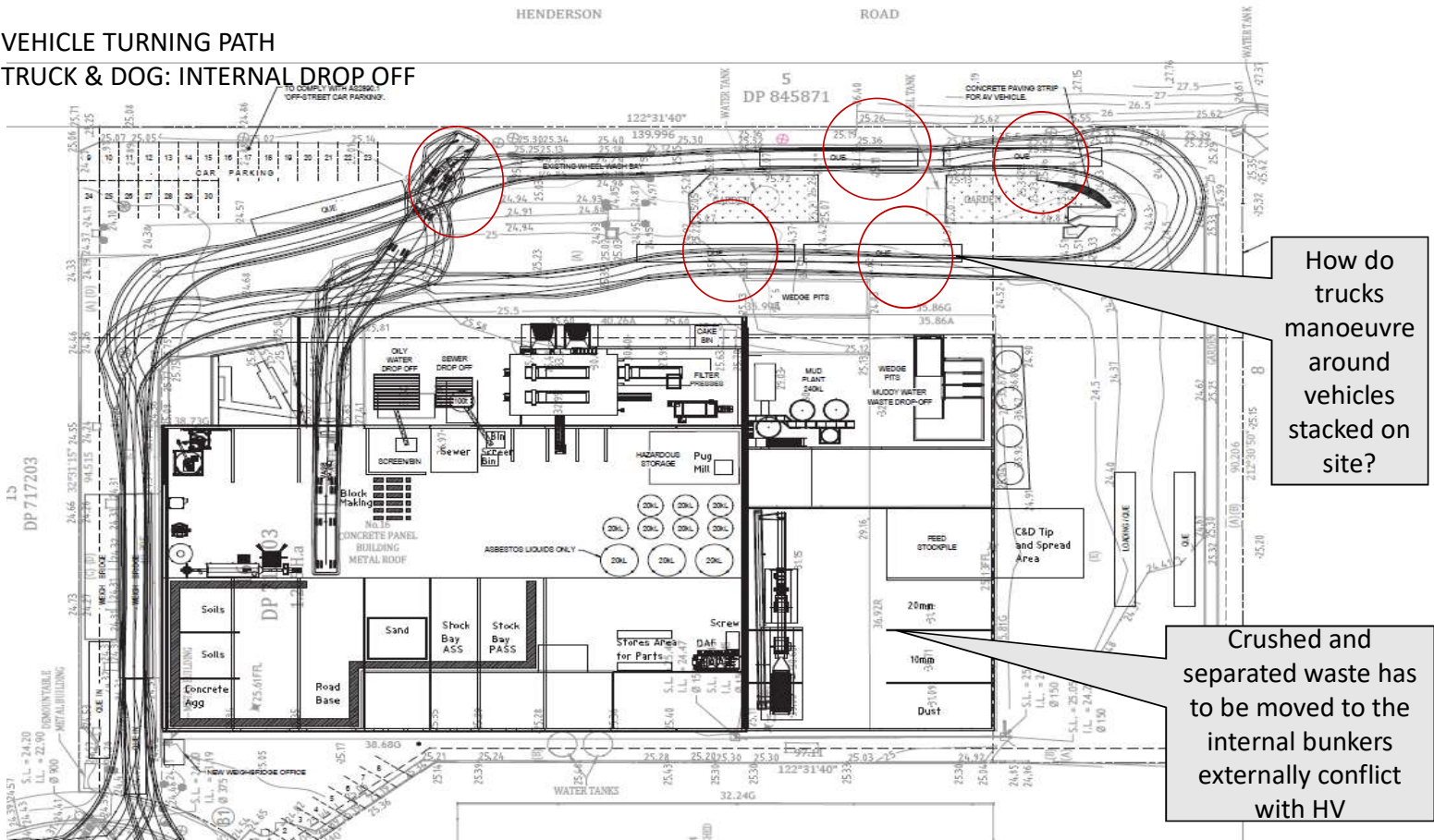




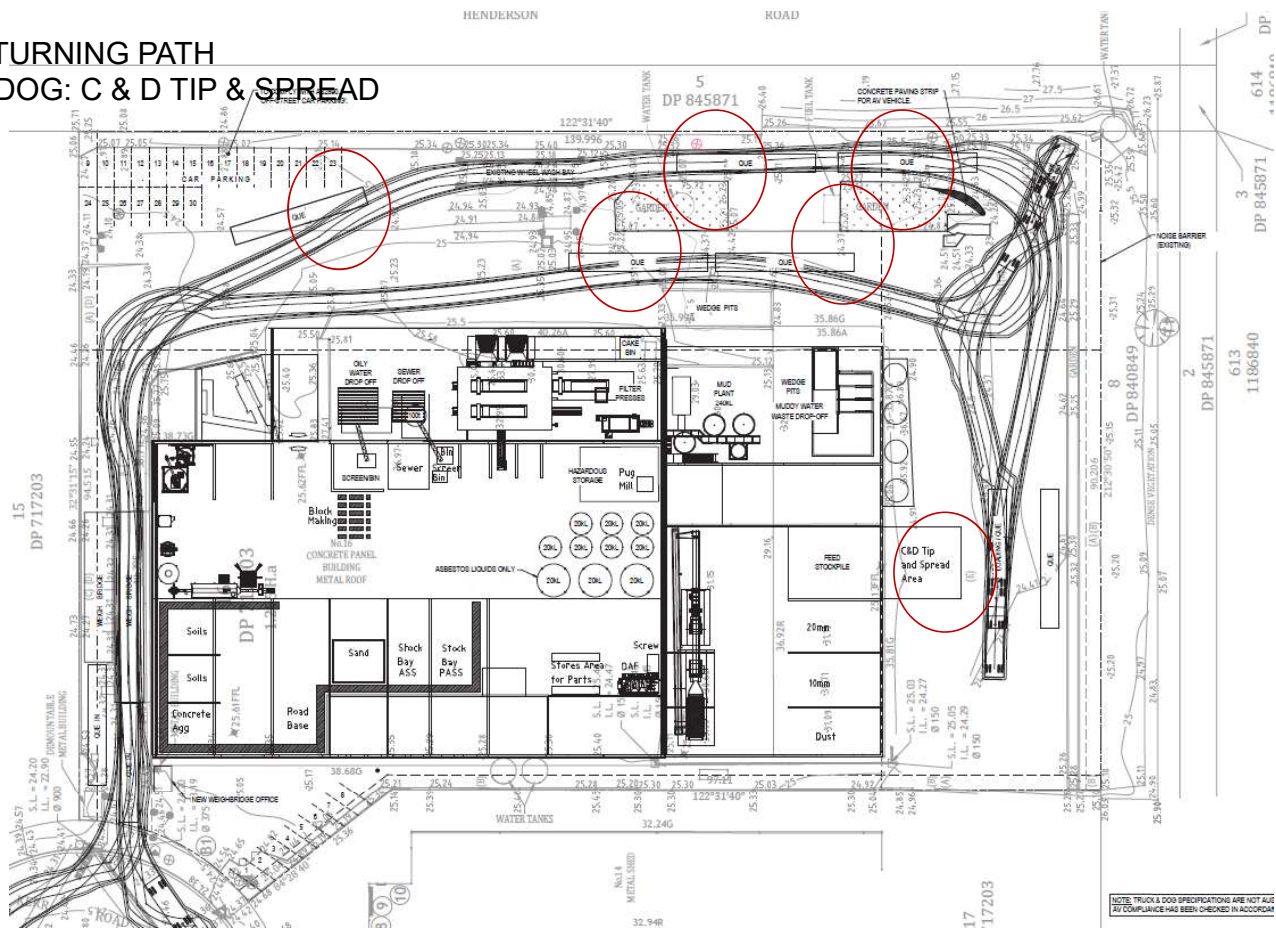
Internal bunker walls adjacent to the glass office wall

- Proposed noise wall not labelled
- Not all processes labelled roller doors not labelled
- Not all equipment labelled
- Liquid waste tanks not labelled

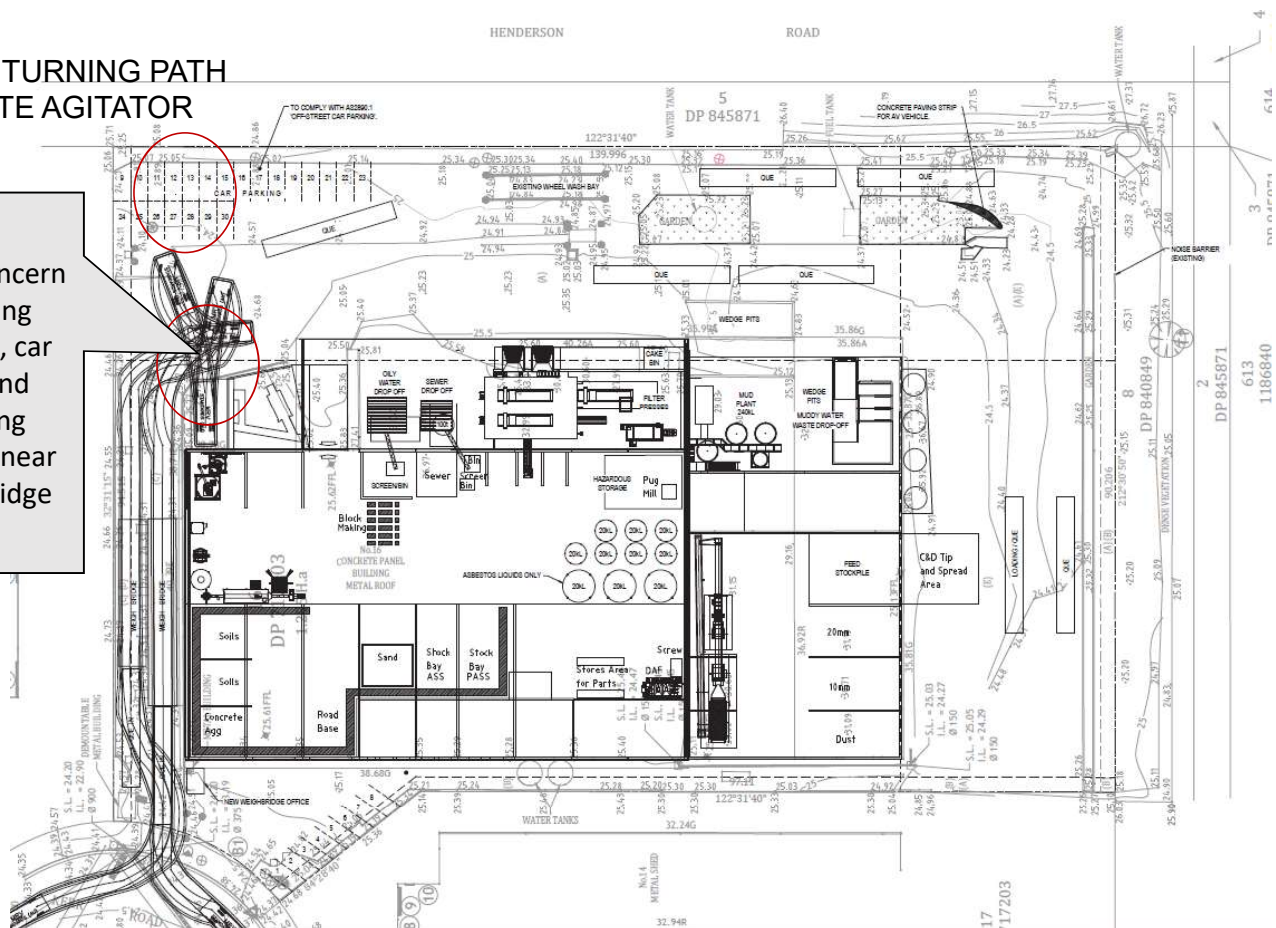
VEHICLE TURNING PATH
TRUCK & DOG: INTERNAL DROP OFF



VEHICLE TURNING PATH
TRUCK & DOG: C & D TIP & SPREAD



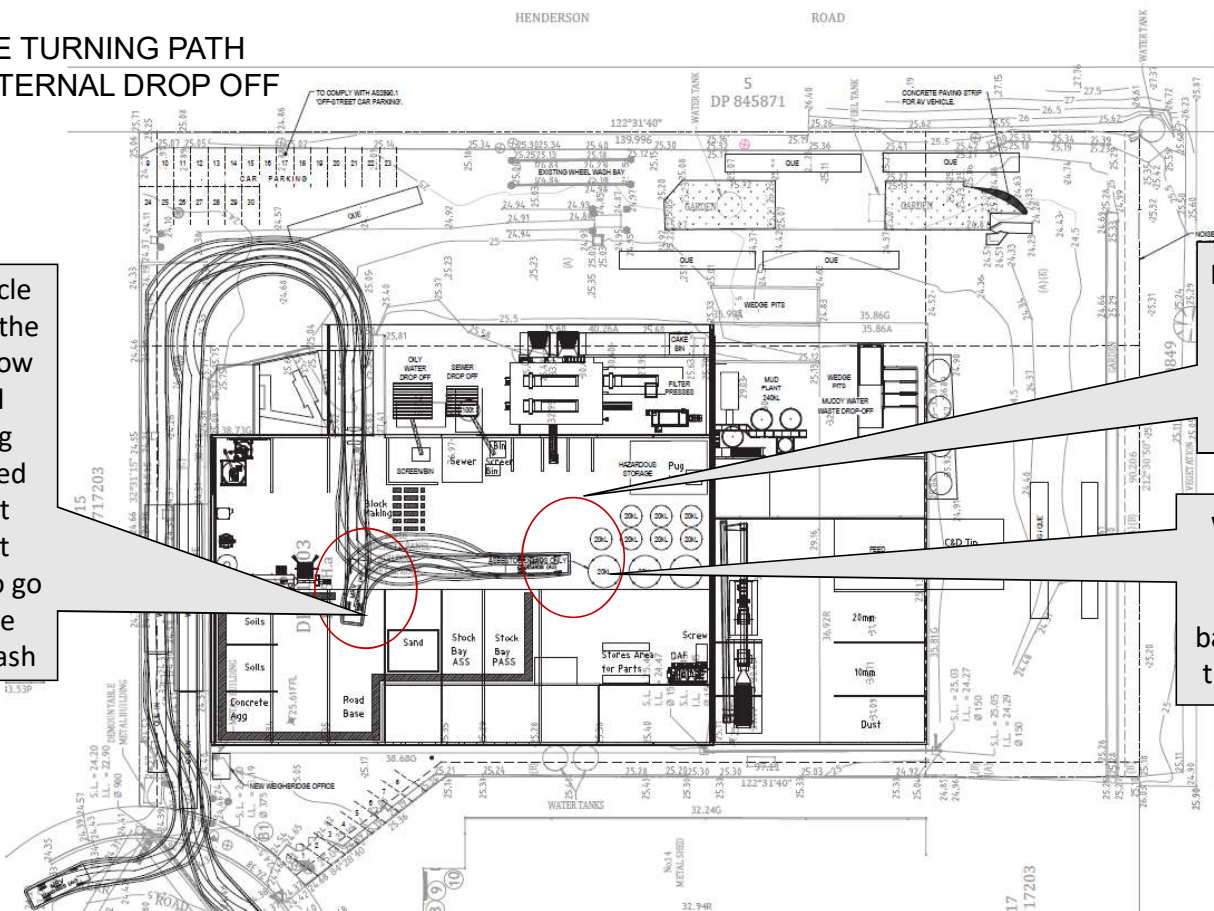
Safety concern reversing trucking, car park and queuing vehicles near weighbridge



HENDERSON ROAD

How will two liquid waste vehicles manoeuvre in this space

What's to prevent vehicles backing into the tanks ?



[illegible]

2
DP 845871
613
1186840

[illegible]

Safety concern reversing trucking and queuing vehicles
--

NEAR MAP 23 January 2020



Susan Fox

From: Abe Lau <abe.lau@safework.nsw.gov.au>
Sent: Monday, 9 March 2020 11:44 AM
To: Susan Fox; Nicholas Hon; Sheelagh Laguna; Emma Barnett; Doris Yau
Cc: Aklesh Nand; Phillip Cantrell
Subject: FW: Response to Submissions - SSD8593 - Ingleburn Resource Recovery

Re: **Response to Submissions - SSD8593 - Ingleburn Resource Recovery**

Hello Susan,

Thank you for inviting SafeWork NSW to comment on the development proposal submission. Please find some specific comments as follows:

- The provided documents described processes involving asbestos and other hazardous chemicals which present feasible potential risk of worker exposure. With little further detail to describe the proposed controls to manage this risk SafeWork NSW would take this opportunity to highlight several legal duties under the Work Health and Safety legislation:
 - [Chapter 8 \(clauses 419-529\) of the Work Health and Safety Regulation 2017](#) (WHS Reg) is dedicated specifically to work involving Asbestos and legal duties of the PCBU (person conducting a business or undertaking) to manage these risks. These include (but is not limited by):
 - Duty to ensure an Asbestos Register and Asbestos Management Plan are prepared, maintained and kept at the workplace.
 - Duty to provide health monitoring to workers at risk of exposure when carrying out work.
 - Control of asbestos exposure risk and other WHS risks by applying the [Hierarchy of control measures](#). It should be noted that higher order controls should be aimed for, and PPE remain as a last order control. Guidance material relevant to ensuring worker safety is freely available from the SafeWork NSW website www.safework.nsw.gov.au.
 - Other WHS matters which may require more clarification in the future include:
 - The storage and handling of caustic soda liquid, sulfur acid and sodium hypochlorite should be reviewed carefully and appropriate control measures and safety devices be considered for implementation. Table 8 of the subject document states that caustic soda liquid, sulfuric acid and sodium hypochlorite are to be stored in the Eastern Chemical bund - these three hazardous chemicals would tend to be chemicals no compatible to be stored together in the same bunded area. Please refer to [Clause 357 Containing and managing spills](#) of the WHS Regulation and ensure compliance.
 - There seems to be virtually nothing in this document about worker safety such as the positioning of safety showers, eye washes, first aid, PPE etc, all of which will be essential mitigative controls to include for ongoing operation of the proposed plant.
 - Note that WorkCover NSW is now known as SafeWork NSW.

This is by no means an exhaustive list, rather some broad areas of concern from our perspective which did not appear to be addressed in the documentation provided. Should we be able to provide any further assistance, please do not hesitate to contact us.

Regards,

Abe

Abe Lau

Principal Inspector | Hygiene and Toxicology
Chemicals, Explosives and Safety Systems

SafeWork NSW,
Better Regulation Division,
Department of Customer Service.
p 02 8867 2754 | m 0408 162 635
e abe.lau@safework.nsw.gov.au | www.safework.nsw.gov.au
Level 4, 2 Burbank Place, Baulkham Hills, NSW 2153



Mr Timothy Baillie
Director
Bulk Recovery Solutions
16 Kerr Road
Ingleburn NSW 2565

Dear Mr Baillie

**Ingleburn Resource Recovery Facility (SSD-8593)
Review of Response to Submissions Report**

I am writing in relation to the revised Response to Submissions (RtS) report, prepared by Bulk Recovery Services and received by the Department of Planning, Industry and Environment (the Department) on 18 June 2020.

The Department has reviewed the RtS report in consultation with the Environment Protection Authority and Council. While it is acknowledged that some of the matters previously raised have been addressed, the Department remains concerned about the level of detail provided for each of the proposed activities and notes that traffic and access, waste storage, water management and safety concerns remain.

The Department therefore requires additional information to progress the assessment (see **Attachment 1** and **Attachment 2**). Unfortunately, Council were not able to provide their comments in time. These will be forwarded to you separately.

The Department requests a teleconference at your earliest convenience to discuss the matters in Attachment 1 further.

To arrange a teleconference, please contact Susan Fox on (02) 9274 6466 or via email susan.fox@planning.nsw.gov.au

Yours sincerely



**William Hodgkinson
Team Leader
Industry Assessments**

Attachment 1
SSD 8593- Ingleburn Resource Recovery Facility
Adequacy Review of Revised Response to Submissions June 2020

- The June 2020 RTS only provides a response to comments on a previous version of the RTS. Please update the document to include a response to submissions received during the exhibition of the development while ensuring all comments on the RTS are also addressed.
- Please clearly articulate in the front section of the report, all components of the development that have changed from the original proposal.
- Given the extent of changes to the development, a request to amend the DA in accordance with Clause 55 of the Environmental Planning and Assessment Regulation 2000 is required.

Site Plans

The Department notes the following comments have been raised previously and remain outstanding:

- The Department requires updated plans which:
 - label the location where waste would be sorted and classified into individual listed waste types (Standard 2 of the “EPA Guidelines: Standards for managing construction waste in NSW”).
 - include labelled diagrams of all plant and equipment to match the process flow diagrams. This includes storage silos, the concrete batching plant and asbestos liquid waste processing equipment. It is noted only the layout for the crushing and screening plant has been provided.
 - show where all wastes types would be stored including, but not limited to, crushed glass, fly ash, grit and screenings from sewage treatment systems, slag, firewater, leachate, groundwater, industrial oily water, restricted solid waste and municipal waste.
 - show and label the site office, weighbridge office and laboratory and chemicals storage area.
 - include all roller doors (roller doors are only labelled on the current site plan).
 - provide the approved plans for the site office and lab.

The Department requests you address following additional comments which are based on the revised RTS:

- ensure all tanks are to scale as some of the smaller volume tanks are larger on the plans.
- show and label all storage bays, including those inside the crushing and screening plant as well as those adjacent to it.

Storage Capacity

The Department notes the following comments have been raised previously and remain outstanding:

- Provide the storage capacities of all existing and proposed structures at the site in tonnes.

The Department requests you address following additional comments which are based on the revised RTS:

- Please clearly articulate the proposed maximum waste storage capacity on site. It is noted the RTS refers to a storage capacity of 7,129.2 tonnes and 15,000 tonnes.

Asbestos Liquid Waste

The Department notes the following comments have been raised previously and remain outstanding:

- The Department has concerns that the proposed high efficiency particulate air (HEPA) filter is not appropriate for filtering liquids, including liquids containing asbestos (LCA). The Department notes Australian Standards, including AS 4260-1997 REC 2018 Clause 1.3.6, define HEPA filters as a “high efficiency particulate air (HEPA) filter”. AS 4260-1997 REC 2018 specifically refers to this filter as “tested at rated airflow capacity”, meaning it is not suitable for filtering liquids.
- Clarify the technical matters raised previously including the use of settling tanks and centrifuges as part of the LCA process.

The Department requests you address following additional comments which are based on the revised RTS:

- Should you wish to pursue the use of a HEPA filter in the manner proposed, it is requested that you provide manufacturers specifications in support and details of other facilities currently operating with development consent using HEPA filters for this purpose.

Stormwater

The Department requests you address following additional comments which are based on the revised RTS:

- The stormwater system for the development is relying on an awning to cover the proposed tip and spread area. The awning is subject to DA 801/2020/DA-O which is currently under assessment by Council. As the awning is not an approved structure, the Department must consider a worst case scenario in which it is not constructed. Therefore, it is requested you respond to previous questions on water management raised by the Department and the EPA.
- Further details are required as to how the external areas would be a clean catchment given the activities in these areas include front-end loaders transporting product, mud trucks releasing mud into the mud pits and trucks accessing the wheel wash.
- The tipping procedures show that all waste vehicles are hosed out before leaving the site, however, it is not clear where this occurs or what this process entails.

Waste Management

The Department notes the following comments have been raised previously and remain outstanding:

- Provide a detailed breakdown of the quantities of incoming liquid waste and general solid wastes (non-putrescible) that would be received and processed at the site. Table 1-1 lists the approved waste types and it also lists the additional wastes proposed to be received but the quantities of incoming wastes haven't been provided. Table 2-4-1 only provides quantities based on broadly categorised groups and Table 2-4-2 only provides estimated quantities for construction and demolition waste based on 100,000 tpa not 225,000 tpa.
- Demonstrate how the site would meet the requirements of Standards 2-4 of the *"EPA Guidelines: Standards for managing construction waste in NSW"* including Standard 4.1.4 noting there is no bunker wall between the sand, road-base and concrete/ag.
- As previously requested, please update flow diagrams to reflect the process descriptions in the EIS.
- Describe and show on a plan where construction and demolition waste would be mixed to form product.
- Please clarify where the glass fines come from and whether they are a bought material like GP cement.

The Department requests you address following additional comments which are based on the revised RTS:

- Page 24 point M states "hazardous soils are stored in designated storage bays" where on page 5 of the revised RTS it is noted hazardous soil treatment has been removed from the development application.
- The *Plant Layout Locations* plan in Appendix C shows waste bunkers outside, and page 24 of the revised RTS states *the construction of the steel awning which will cover fully this area as well as the external storage bays by preventing the ingress of any rainwater in these areas*". Yet elsewhere, the RTS states that no storage bay will be located outside.
- The 'Sewer Plant Flow Diagram', drawing number BRSLs-003, in Appendix D shows a sewage truck tipping waste into 'Process 2'. Please describe this process and confirm whether this action was accounted for in the odour assessment.
- Please clarify why concrete, sands and soil are not considered part of the solid waste stream.
- If it is proposed to accept kerbside domestic recycling on site, please demonstrate where it would be stored and separated and demonstrate how vehicle conflicts between heavy vehicles and small vehicles would be avoided.
- If it is proposed to accept restricted solid waste, please demonstrate where it would be stored and describe how much can be stored at the site at any one time.

Traffic

The Department notes the following comments have been raised previously and are outstanding:

- The site has weighbridge data from the existing operations. It is requested that this data is relied upon to inform the traffic impact assessment.
- The traffic stacking and queuing procedure requires further information to demonstrate the site can operate without waiting/queueing on the public road network. Additionally, please demonstrate:
 - how arriving vehicles would be managed, noting Figure TURN05 indicates a small liquid waste truck cannot enter the site while a C&D truck queues.

- how a heavy vehicle would move to and from the tip and spread area while a heavy vehicle is queuing adjacent to this area.
- Provide the additional swept path plans as requested previously or explain why they are not required.
- The RTS hasn't addressed previous comments regarding safety concerns in relation to reversing trucks conflicting with cars parked or queuing vehicles or the potential for a reversing vehicle to reverse into one of the tanks

The Department requests you address following additional comments which are based on the revised RTS:

- Page 28 of the revised RTS states the timestep chart has misrepresented the traffic management within the site. Please provide an updated timestep analysis to accurately detail the number of vehicles on site at any one time.
- Page 29 of the original RTS has noted the original traffic assessment was based on a worst case scenario, however, on Page 30 the revised RTS states the numbers were incorrect. Please update the traffic assessment with the correct numbers while ensuring they are based on a worst case scenario.

Attachment 2
Agency comments



DOC20/51394-1

Industry Assessments
Department of Planning, Industry and Environment
Via email: information@planning.nsw.gov.au

Attention: Ms Susan Fox

15 July 2020

Dear Ms Fox

Bulk Recovery Solutions Pty Ltd – Ingleburn Resource Recovery Facility – SSD 8593

I refer to your email dated 26 June 2020 to the Environment Protection Authority (EPA) in which you provided information on the Revised Response to Submissions Report (RRtS) for the proposed Ingleburn Resource Recovery Facility (SSD 8593) and invited comments and advice from the EPA.

The EPA has reviewed the RRtS and is of the view that further information or clarification is still required to enable a complete and proper assessment of the application.

Our review of the application and RRtS has identified some outstanding issues around waste and water management at the site. Further detail about our concerns and the additional information required is provided in Attachments A and B.

Once the additional information is received, we will complete our assessment and be in a position to provide you with our consolidated comments and, if appropriate, recommended conditions of consent.

If you have any questions about this matter, please contact Matthew Davidson on 02 4224 4104.

Yours sincerely

A handwritten signature in black ink, reading 'Nick Feneley', enclosed within a simple, elongated oval shape.

NICK FENELEY
Acting Unit Head Regulatory Operations

Attachment A – Water

Water Management System

In our comments on the original Response to Submissions document (see our letter to the Department dated 6 March 2020), we raised a number of concerns relating to the proposed water management plan for the proposal and sought additional information to ensure that risks to water quality could be adequately assessed.

We note that rather than providing all of the additional information requested in our letter, the applicant now proposes to implement a revised Water Management Plan that involves the installation of an awning over the 'tip and spread' area to reduce the size of the dirty water catchment (refer RRtS – Appendix J - Revised Water Management Plan and Water Balance prepared by DRB Consulting Engineers dated 15 June 2020).

The EPA has reviewed the revised Water Management Plan and determined that clarification on the following points is required before a proper assessment can be made:

- It is stated in the revised Water Management Plan that all dirty water catchment areas have been moved internally ('Response to EPA comments'). The 'tip and spread' area, which is part of the dirty water area, is proposed to be covered with an awning and isolated from the rest of the site through bunding. However, the wheel wash and tracking areas remain exposed and should be included in the dirty water catchment.
- The system that the dirty water area drains to, and the treatment it receives, need to be specified. It is stated in the revised Water Management Plan that 12,888m² of the site drains to the 120kL harvesting tank. This is only 62m² less than the entire site, implying that all internal areas, clean areas, dirty areas and a portion of the 'tip and spread' area drains to the 120kL harvesting tank. It is unclear what parts of the site remain to drain to the existing stormwater system which is proposed to be 'unblocked', removing storage capacity.
- The Water Management Plan needs to clearly articulate which catchment areas will drain to the harvesting tank and receive treatment in the Stormfilter Chamber. It also needs to outline the conditions under which the treatment process is bypassed and to define the expected water quality that will be discharged to stormwater from the treatment process.
- Section 3.4 of the revised Water Management Plan states that drainage easement at the site was created to allow overland flow from the railway line land to traverse the site. The applicant should clarify whether the Water Management Plan and water balance considers runoff that could enter the site from railway line and from any other sources beyond the site boundary.

Additionally, in our letter dated 6 March 2020, we made the following recommendation:

- It is recommended that the applicant provide sufficient storage to manage any residual water quality risks from the dirty water capture area with reference to relevant guidelines for the storage and management of contaminated water (e.g. Environmental Guidelines: Solid waste landfills (EPA,2016)).

The proposed 120kL harvesting tank described in the revised Water Management Plan will only capture the first 10mm of rainfall that falls over the site. It also appears that the whole site may, unnecessarily, drain to the harvesting tank. As such, the recommendation contained in our letter from 6 March 2020 is still appropriate to address the issue.

Finally, we note that the awning now proposed to be installed over the 'tip and spread' area is subject to a separate Development Application with Campbelltown City Council. If development consent is not granted in relation to the construction of this awning, all information previously requested by the EPA regarding water management at the site will be required in order for the EPA to be in a position to adequately assess the proposal.

Attachment B - Waste

Waste Storage Capacity

We note that, in the RRtS, the applicant has reduced the amount of waste proposed to be stored at the site at any one time from the initially proposed figure of 15,000 tonnes to 7,129 tonnes. The applicant has provided some detail around the densities of both solid and liquid wastes used in the calculation of this amount.

However, the EPA requires additional information justifying the capacity of each storage bay to be used in the storage of solid waste in order to assess the true capacity for waste storage of the proposal. We request that the applicant provides:

- all calculations used to determine the storage capacity of each bay as shown in Table 2-3-1 of the RRtS;
- the footprint of each bay in square metres;
- the proposed stockpile height in each bay; and
- the stockpile shape factor for each bay.

Asbestos Containing Liquids

Under section 144AAA (1) of the *Protection of the Environment Operations Act 1997* (the Act), a person disposing of asbestos waste off the site at which it is generated must do so at a place that can lawfully receive the waste. Additionally, under section 144AAB of the Act, a person must not cause or permit asbestos waste in any form to be re-used or recycled.

If any asbestos fibres are not captured by the proposed filter system those fibres would end up in the sewer system (not a place that can lawfully receive asbestos waste) and potentially in sewage sludge which is recycled by Sydney Water as biosolids. Accordingly, it is imperative that any water proposed to be discharged from the site is free of asbestos fibres.

In our letter dated 10 July 2019, we advised that we had concerns that the proposed methodology for the treatment of asbestos containing liquids may not adequately remove all asbestos fibres prior to discharge to sewer. We requested additional information about the process and any associated testing. We also recommended that the proponent ensure that the discharge of this material to sewer is covered by the trade waste agreement with Sydney Water.

New information provided in the RRtS document has raised some additional concerns including:

- Appendix D of the RRtS (Tipping Procedures/Flow Diagrams) indicates that upon arrival at the site drivers of trucks carrying asbestos containing liquids will be provided with a small bottle and asked to tip some of their load into the bottle and give it to a site attendant for analysis. It is unclear how this will be achieved without the material impacting the driver and attendant or spilling onto the ground and becoming uncontained.
- Appendix D of the RRtS (Tipping Procedures/Flow Diagrams) indicates that after emptying their load of asbestos containing liquid, the driver is required to hose out his truck. It is possible that washout water will contain asbestos fibres and it is unclear how the wash out will be achieved without fibres impacting the driver and attendant or spilling onto the ground and becoming uncontained. This conflicts with statements made elsewhere in the application that all asbestos liquid waste will be fully contained.
- Clogging of filters. The asbestos containing liquids include drilling muds which, by their nature, will have a high sediment load. It is unclear how the efficiency of the filters will be maintained, given they will be vulnerable to clogging by the solids in the water.

- It is unclear whether the filter press in the Asbestos Containing Liquids process will have the ability to retain asbestos sized fibres in the filter cake. This should be clarified as it appears that any liquids separated by the filter press will discharge directly to the sewer.
- The proponent claims that HEPA filters are commonly used for removing asbestos from water but has not demonstrated this with any examples. The proponent also claims that HEPA filters can be used to remove asbestos fibres from liquid waste at higher than 97% removal efficiency. This suggests that 3% of fibres may still be discharged even when the filters are operating at optimum efficiency. For the reasons outlined above, any discharge of asbestos fibres would be unacceptable. We recommend that Planning requests that the applicant provide copies of the manufacturer's technical specification for the filters, along with documentation attesting to their ability to adequately remove asbestos fibres from liquids.
- No clear testing regime for verifying that discharge waters are free of asbestos has been described. The Proponent has stated that discharge waters will be routinely tested by a NATA accredited laboratory, but the testing frequency and methods have not been described.
- Limited information has been provided on the detail of how the system will be maintained (including cleaning and replacement of filters) to ensure safety, integrity, and effectiveness of the system. It is understood that many of these tasks would be undertaken by the equipment supplier, however methodologies and frequencies of servicing have not been explained.

The EPA recommends that Planning obtain advice from a suitably qualified and experienced person in relation to the proposed methodology for the treatment of asbestos containing liquids and to provide advice on the concerns raised above.

Further, whilst the proponent has previously indicated its intention to engage with Sydney Water about the need for a new Trade Waste Agreement that covers discharges from the proposed asbestos containing liquids line, no information has been provided as to progress with these discussions. As such, it remains unclear whether the discharge of this material to sewer is covered by any agreement.

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Submission for: Ingleburn Resource Recovery Facility

Objects

Calane Pty Ltd ATF John Edward Star Second Family Settlement

WOMBARRA, New South Wales

Message

Dear Independent Planning Commission,

Re Development Application SSD-8593 (16 Kerr Road Ingleburn, NSW 2565)

As the owner of the neighbouring property (15 Kerr Roads Ingleburn) we object in the strongest possible way to Development Application SSD-8593. If approved, this development will cause immeasurable harm to the businesses that operate out of 15 Kerr Road. The environmental harm, economic damage and damage to the local community that we believe will flow from this Development Application (if approved) has been outlined in the attachment named "Objection to Development Application SSD-8593".

Additionally, we believe that other businesses located along Kerr Road will suffer from a dramatic increase in heavy vehicle movements (see attachment "Complaints from Local Businesses"). Residents have also expressed serious concerns about this Development Application (as evidenced by the attached petition which has been signed by over 40 residents).

We ask that the Independent Planning Commission seriously consider the points raised in this objection and take note of the fact that both residents and local businesses oppose this Development Application.

Yours sincerely

Frederick Newman

Attachments

[Objection to Development Application SSD-8593 - Final](#)

[Petition - Objection to Ingleburn Resource Recovery Facili](#)

[Complaints from Local Businesses](#)

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Objects

Matthew Nicholls

Ingleburn, New South Wales

Message

Having been a resident for 15 years, I am concerned that the facility is not commensurate with the surrounds and nearby residential area. Current planning has indicated 'medium density' housing is intended, and high density further towards the town centre from my address. The proximity to homes, noise pollution, hours of operation and 'dust' that I have witnessed on many occasions from the site are cause for concern. I have personally observed increased levels of air pollution in the area, clouds of dust frequently generated from the site. I feel strongly that the facility is not suited to the area and to allow further expansion is not in the best interests of the community, Ingleburn village and local residents. I have previously consulted with neighbours in the area those I have spoken to agree. I have reviewed the majority of the proposal and find that the commentary about the 'majority' of work being conducted indoors, does not preclude any environmental, noise, air, water, pollution the site generates. Further the proximity to water courses is not considered.

Consideration to relocation of the site is requested if further expansion is necessary. The application is not consistent with the surrounding 'industrial' businesses. Waste recovery facilities should not be expanded nor introduced in residential proximity.

The letter drop they have claimed was not received in my mail box either.

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Submission for: Ingleburn Resource Recovery Facility

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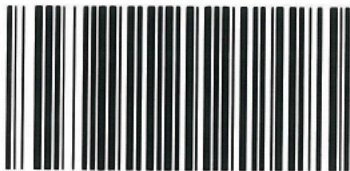
BOWRAL, New South Wales

Message

I object to increasing the throughput and storage capacity of hazardous waste. This is far too close to residential areas.

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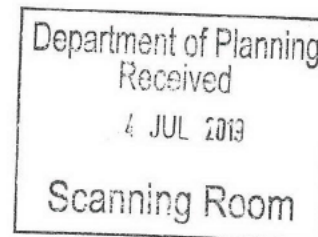
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PCU076713

Application No SSD8593
16 Kerr Rd Ingleburn
Lot 16 DP717203

Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001



Attention: Kelly McNicol Team Leader, Industry Assessment

2 July 2019,

(Please delete my personal information before publication)

I am property owner of [REDACTED], please put forward this application as a double objection to the above application relating to 16 Kerr Rd Ingleburn No. SSD8593.

During the past 18 months I have spent a considerable amount of money to renovate both my properties for Rental.

I have personally experienced excessive noise and vibration along with severe odour directly from the operation at 16 Kerr Road Ingleburn.

This operation has caused me damage as I have had to reduce the rental on both properties due to the actions of this company.

The tenants have continually made complaints regarding chemical smells, at times sulage smells & thudding noise which has impacted there quality of living.

I also raise concern with the distance from a natural water cause; the operation of this nature is situated within very close proximity to residential zoning especially as the area has future high-rise building approval 1000 dwellings.

After some enquires I have been advised that this operation should NOT be approved as there waste streams and methods of operations exceed the limits and are within 40 meters of a natural water body, so chemical, sulage & effluent storage should be prohibited on this property due to the close proximately of residential Zoning & the waterway. Crushing grinding & separation works must not be within 250 meters of residential zoning and 100 meters of natural water way, along with the noise impact this should also NOT be approved.

I object unconditionally by way of above along with the additional heavy vehicles on the roads as they are already congested. Not to mention that this development will have an impact on the neighbourhood amenity and comfort of living for the current residence and the additional 1000 new high-rise dwelling earmarked for the area.

This development is designated & integrated.

I [REDACTED] declare that I have never donated or been affiliated with any political party/organisation.

[REDACTED]
Yours faithfully
[REDACTED]

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Objects

Name Withheld

HILL TOP, New South Wales

Message

The basis on my opposing of the expansion is predominantly on Health & Safety of both Staff and contractors who attend my workplace.

Key notes as follows

- Current increased flow of Tip trucks/Concrete agitators has made Kerr road quite a dangerous street – It is a 50km/h zone and quite regularly (as common across all of Sydney) these vehicles are running at estimated speeds of 80 to 100 km/h, This has caused major concerns for both my logistics contractors entering/exiting property along with staff along with several near miss incidents – Bulk Recovery solutions have made no attempts to monitor the way their customers are treating safety prior to entering or post leaving their site.
- Concrete agitators aswell as pump trucks regularly washing out excess in gutters if unable to enter Bulk Recovery solutions in time
- Excessive dust issues on windy days caused by current plant
- Excessively unclean roads which are then washed down into storm water drains by unregistered plants driving up and down Kerr road

If expansion is allowed it is furthermore creating unsafe/unhealthy conditions for all other residents in Kerr Road. With current issues due to operations quite a regular occurrence

As far as noted no infrastructure upgrades have been proposed to accommodate the increased excessive traffic flow nor any reason given to believe that correct health and safety procedures will be implemented as they have not been in the past.

Regards.

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INGLEBURN, New South Wales

Message

The facility is too close to the residential area and the sporting ground. The residents can already hear the loud banging noise comes from the facility during the day and there are a lot of elderly people living within a few hundreds meters of this facility. I have a great concern over the noise and air quality within 500 meters of this facility if the project is going ahead.

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Objects

Name Withheld

INGLEBURN, New South Wales

Message

The air quality in the area has progressively gotten worse over the last 10 months. I have Asthma and it has gotten worse in these 10 months and I now rely on my medication daily, I used to use it twice a week. From what we can see from the road they have uncovered waste materials in their yard for processing, the wind picks up this and distributes it around our local area. I am curious to know if this is Asbestos? If the increase production of waste there will be a lot more trucks on our road and this is getting dangerous now with the amount of trucks, it will not be long before there is an accident involving their trucks. The water they spray on Kerr rd, I am not sure if this is even legal. If the water is clean shouldn't it be put into the drains. This water will be dirty and contain some type of contaminant that is not known to anyone. The water is from their trucks to clean out any waste materials, then sprayed onto the road.

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INGLEBURN, New South Wales

Message

Noise pollution, Increased heavy traffic in the area and air pollution are my main concerns for objecting to this project.

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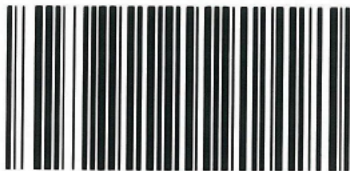
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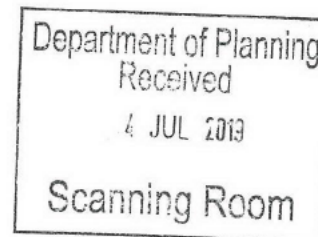
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PCU076713

Application No SSD8593
16 Kerr Rd Ingleburn
Lot 16 DP717203

Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001



Attention: Kelly McNicol Team Leader, Industry Assessment

2 July 2019,

(Please delete my personal information before publication)

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I also raise concern with the distance from a natural water cause; the operation of this nature is situated within very close proximity to residential zoning especially as the area has future high-rise building approval 1000 dwellings.

After some enquires I have been advised that this operation should NOT be approved as there waste streams and methods of operations exceed the limits and are within 40 meters of a natural water body, so chemical, sulage & effluent storage should be prohibited on this property due to the close proximately of residential Zoning & the waterway. Crushing grinding & separation works must not be within 250 meters of residential zoning and 100 meters of natural water way, along with the noise impact this should also NOT be approved.

I object unconditionally by way of above along with the additional heavy vehicles on the roads as they are already congested. Not to mention that this development will have an impact on the neighbourhood amenity and comfort of living for the current residence and the additional 1000 new high-rise dwelling earmarked for the area.

This development is designated & integrated.

I [REDACTED] declare that I have never donated or been affiliated with any political party/organisation.

[REDACTED]
Yours faithfully
[REDACTED]

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Objects

Alexandra Rouen

INGLEBURN, New South Wales

Message

It is too close to residential properties with noise and cement dust already being a problem, expanding the size and operating time will cause massive issues for the surrounding residents. Many of which are young families and the elderly.

It will raise major health concerns in the future for long standing residents, due to the nature of cement dust.

It will likely also destroy property values for the area.

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From: William Hodgkinson [mailto:William.Hodgkinson@planning.nsw.gov.au]
Sent: Monday, 31 August 2020 8:30 AM
To: tim <tim@awe.com.au>
Cc: bradley <bradleyr@bulkrecoverysolutions.com>
Subject: Council comments - SSD-8593

Hi Tim,

Council has provided the following comments on the draft Response to Submissions (RtS) previously submitted. It is requested that you please address these comments within the revised RtS.

Please don't hesitate to give me a call if you would like to discuss anything further.

These are *comments relate to the Traffic Assessment Report for Kerr Road.*

- Council's normal position is that any required parking including any required queuing, loading, unloading for any vehicles (cars, trucks etc) that *are* required for a use *shall* take place wholly on the site and not within the surrounding local road network.
- It is highly unlikely that Council has ever approved a development that allows truck queuing on the road directly in front of the subject site or elsewhere in the surrounding road network.

In respect of the proposed development and Traffic Assessment Report, the following issues are raised.

- Without having taken a site inspection, Council's mapping system shows that Lancaster Road is single lane each way with no dedicated road shoulder areas. It runs through the middle of the industrial area. Page 5 of the Traffic Assessment Report states that Lancaster Road near the site is a two-lane, two way sealed road with on-street parking lanes. The photo identifying Lancaster Road shows that it is a single lane each way road with no on-street parking lanes. Council's aerial photos also show that it is single lane each way and has no dedicated on-street parking lanes.
- Council's aerial photo as well as the photos in the report show that Lancaster Road is currently being used for cars and trucks to park on the street which is assumed for businesses that front Lancaster Road.
- Aero Road and Kerr Road are not able to be used for truck queuing as the roads are already congested with trucks and cars parking on the street from business along those roads. Photographs 7 and 8 confirm this.
- The report has indicated that existing traffic is not included in the assessment however has been picked up in the traffic counts carried out. An assessment of the existing traffic as well as the proposed traffic as a result of the proposed use is required.
- The weekday daily vehicle trips calculations on page 11 is wrong. In addition, calculation should be based on rounded up numbers. It is not possible to do 3.28 vehicle trips per hour, its 4 trips per hour.
- The report has determined the capacity of the road network with all roads being two-lane two-way roads except Williamson Road and Henderson Road. Lancaster Road and Aero Road are not a two-lane two-way roads. The report states that the capacity of these roads is 1,800 vehicle trips per hour (900 vehicle trips per hour x2) however should be 200 vehicle trips per hour. The report is required to be amended with traffic studies done on the existing traffic as well as the proposed traffic due to the development.
- The report does not provide a thorough assessment of whether the site provides sufficient car parking spaces for the development as insufficient information was provided. The report *should* be amended to provide a detailed car parking assessment based on the plans of the proposed development.
- The report states that there are suitable loading arrangements and queuing areas for heavy vehicles within the site will be satisfactory for the increased production for the site however the proposal relies on trucks queuing in Lancaster Road which demonstrates there is insufficient area on site for loading and queuing.

In conclusion, Council does not support the queuing of trucks along Lancaster Road. There are no formal road shoulders provided for vehicles to park on the side of Lancaster Road with the road only being one way each lane. Lancaster Road is already used by vehicles parking on the street which is assumed to be from the business that front Lancaster Road. Queuing of trucks on Lancaster Road would lead to congestion within this road as well as adversely impact upon the business that front this road. All trucks waiting to access the site are to queue within the subject site. If this cannot occur, consideration should be given to reducing the size of the proposed development.

Regards,

Will Hodgkinson

Team Leader

Industry Assessments

4 Parramatta Square, [12 Darcy Street](#) | Locked Bag 5022 | Parramatta NSW 2124

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