

21 November 2016

M/s Kate Masters
Senior Planning Officer, Waste
Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear M/s Masters

Mayfield West Recycling Facility (SSD 16_7698)

I refer to the Environmental Impact Statement (EIS) exhibited on the NSW Department of Planning and Infrastructure web site in relation to the Mayfield West Recycling Facility Project (SSD 16_7698). Mayfield West Recycling Facility proposes to increase the processing capacity from 90,000 tonnes per annum (tpa) to 315 tpa and amend the site layout with an additional stockpiles area.

Hunter New England Population Health (HNEPH) has reviewed the Environmental Impact Assessment (EIS) and associated documentation, paying particular attention to the management of air quality, noise, soil, water and other issues which may have an impact on human health. In this regard particular attention should be paid to the conditions as set out in Newcastle City Council's DA2015/0291 Pt C, D and E. These conditions have a significant effect on public and environmental health and their compliance should be strictly enforced prior to the commencement and during the construction stage of this proposal.

HNEPH notes the emphasis in the Director General's Requirements on effective and genuine community consultation with active involvement of the community in this process. There is some sensitivity in the community associated with this development proposal, thus, your community consultation plan should have a process that continues up to and, if approved, during the ongoing operation of the development.

The following should also be considered in the approval process for this project:

Air Quality

Long and short-term exposure to PM_{2.5} & PM₁₀ causes health effects which may lead to premature death and increased hospital admissions. The EIS states that the air quality impacts from the proposal are negligible. Some receptors are predicted to experience incremental impacts in PM_{2.5} that would not generally be considered negligible. Although the sites most impacted are industrial, the EIS states that R13 may be the site of a future residential development. The proponent should demonstrate that the mitigation measures implemented throughout their operation of the project include all reasonable and feasible measures to minimise incremental impacts for PM_{2.5} & PM₁₀.

Hunter New England Local Health District
ABN 63 598 010 203

Hunter New England Population Health
Locked Bag 10
Wallsend NSW 2287
Phone (02) 4924 6477 Fax (02) 4924 6490
Email HNELHD-PHENquiries@hnehealth.nsw.gov.au
www.hnehealth.nsw.gov.au/hneph

In addition it should be noted on 15 December 2015, the National Environment Protection Council (NEPC) agreed to vary the National Environment Protection (Ambient Air Quality) Measure (NEPM). The amending instrument took effect on 4 February 2016. The new standards are as follows:

Pollutant	Averaging Period	Maximum concentration standard	Maximum allowable exceedances
Particles as PM ₁₀	1 day	50 µg/m ³	None
	1 year	25 µg/m ³	None
Particles as PM _{2.5}	1 day	25 µg/m ³	None
	1 year	8 µg/m ³	None

Reference: <https://www.legislation.gov.au/Details/F2016C00215>

The proposed onsite air monitoring should be assessed against these criteria.

Noise

Environmental noise can have negative impacts on human health and well-being and trigger ongoing community complaints about annoyance, sleep disturbance and stress. Evidence concerning the adverse health effects of environmental noise is detailed in a number of publications, for example, the World Health Organization Night Noise Guidelines for Europe (2009) and the WHO Guidelines for Community Noise (1999). To protect public health, it is prudent to take all reasonable and feasible measures to minimise public exposure to industry-related noise, irrespective of compliance with the relevant noise policies.

The applicant should ensure compliance with all EPA and Council noise criteria.

Water and Sewerage

The EIS does not include the applicant's intentions in respect to the provision of a water supply and sewerage services to the site in accordance with the provisions of Hunter Water Corporation.

Surface Water

The collection, retention, treatment, use and offsite discharge of surface water is not adequately addressed in the EIS. Further assessment needs to be undertaken on the potential for offsite discharge and its implications on the receiving environment.

Groundwater

The nature of this type of development and its close proximity to receiving waters increase the potential risk of contamination of ground water reserves in and around the site. There needs to be further assessment, management and monitoring of any ground water associated with this proposal.

Water Management and Monitoring

The EIS needs to include a comprehensive Water Management Plan (WMP) which addresses potable, surface, ground and waste water. The WMP should address all aspects of assessment, management and continuous monitoring of water associated with this proposal.

If you require any further information please contact Chris Williams, Environmental Health Officer on (02) 49246477

Yours Sincerely



Mr Michael DiRienzo
Chief Executive