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Department of Planning and Environment  
Industry and Assessment  
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Attention: Ms Kate Masters

**Standard Post and Electronic Mail  
24 November 2016**

Dear Kate

**Mayfield Resource Recovery Facility SSD 7698 - 1a McIntosh Drive, Mayfield West, Newcastle**

I refer to your letter dated 24 October 2016 inviting the Environment Protection Authority ("the EPA") to comment on the State Significant Development (SSD) 7698 and environmental impact statement for the Mayfield West Recycling Facility, located at 1a McIntosh Drive, Mayfield West in the Newcastle local government ("the Premises").

The EPA understands from the development application that Benedict Recycling Pty Limited proposes to increase the processing capacity at the Premises from 90,000 tonnes per annum to 315,000 tonnes per annum. The proposal also includes amendments to the site layout for the purpose of an additional stockpile area.

The EPA has reviewed the *Environmental Impact Statement, Mayfield West Recycling Facility at 1a McIntosh Street, Mayfield West* ("the EIS") prepared for Benedict Recycling Pty Ltd dated October 2016 and provides the following comments.

**Air Quality Impact Assessment**

The EPA has reviewed the Air Quality Impact Assessment (AQIA) titled, *Mayfield West Recycling Facility – Production Increase. Air Quality and Greenhouse Gas Assessment* (Ramboll Environ, September 2016) and is of the opinion that it has been prepared generally in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (Approved Methods)*. However, the EPA has identified some issues with the AQIA, detailed below, which require addressing via the provision of a revised assessment and prior to issuing recommended conditions of approval.

**1. Unclear if the crushing and screening plant will comply with the Clean Air Regulation**

As outlined in Schedule 4 of the Protection of the Environment Operations (Clean Air) Regulation 2010 (the Clean Air Regulation) any crushing, grinding, separating or materials handling activity must comply with a Group 6 solid particles (Total) emission concentration limit of 20 mg/Nm<sup>3</sup>. The AQIA did not include an estimate of the concentration of solid particle emissions from the crushing and screening operations and whether or not emissions would comply with the Clean Air Regulation limit.

***The AQIA must be revised to include the concentration of solid particle emissions from crushing and screening operations and a comparison to the Clean Air Regulation limit of 20 mg/Nm<sup>3</sup>.***

**2. It is unclear whether the glass stockpiles can be a significant source of odour.**

Glass is crushed at the site and stockpiled outside. It is unclear from where the glass is sourced. If glass has been sourced from kerbside collections, then odour emissions from crushed glass stockpiles can be significant. Currently the AQIA assumes that the only odour source at the site is greenwaste.

***The AQIA should specify from where the glass is sourced. If the glass is sourced from kerbside collections, then the stockpiles of crushed glass should be considered as a source of odour, and the AQIA revised.***

**3. The AQIA assumes average operating capacity**

The AQIA assumes emissions are based on annual production, and there is not a maximum daily throughput. Campaign crushing in the heavy waste yard, which takes place approximately two to three weeks per year, has not been modelled. Since criteria are not just annual averages, maximum operating conditions (even if just for a short time) can cause exceedences in the impact assessment criteria.

***Maximum operating conditions should be modelled, and results compared to impact assessment criteria.***

**4. The AQIA predicts one additional exceedence of 24 hour average PM<sub>10</sub> concentration per year.**

The modelling predicts one additional day of exceedences in PM<sub>10</sub> 24 hour average concentration per year. However, the AQIA concludes that the proposed expansion is unlikely to result in exceedences in the air quality impact assessment criteria, due to the very conservative assumption that all material received at the facility is processed.

Conclusions should not be inconsistent with modelling results. If the assumptions are considered too conservative then they should be revised, with justification, and modelling redone.

Processing data of the current operations could be used to give a more realistic ratio of materials received to materials processed. If remodelling (including maximum operating conditions discussed in 3 above) still indicates exceedences, then further mitigation measures need to be considered, and the AQIA revised accordingly.

***The modelling should be revised to include more realistic (justifiable) assumptions. If exceedences are still predicted, then, in accordance with Section 11.2.3 of the Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales, the proponent must revise the AQIA to include the application of effective mitigation measures or emission controls.***

**5. The AQIA does not specify the location or type of sources that are modelled. Wind erosion from stockpiles was not modelled.**

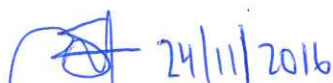
The AQIA should show the location and type of sources used in the modelling. Wind erosion associated with the unsealed area of the external yard (0.66 Ha) is modelled assuming the erodible material is overburden. The 2.79 Ha of stockpiled materials was not modelled.

***In accordance with the Approved Methods, the AQIA should specify the location and type of sources used in the modelling. Furthermore, the modelling should include wind erosion from the 2.79 Ha area used for stockpiles, and use a more conservative emission factor for the stockpiles than that of overburden.***

It is recommended that the above deficiencies in the AQIA are addressed prior to the EPA providing recommended conditions of approval.

Should you have any further questions in relation to this matter please contact Karen Gallagher on 02 49086822.

Yours faithfully

A handwritten signature in blue ink, which appears to be 'S. James', followed by the date '24/11/2016'.

**STEVEN JAMES**  
**Unit Head, Waste Compliance - Hunter**  
**Environment Protection Authority**

