



DOC18/983325

Mr Kelly McNicol
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Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Att: Bruce Zheng

EMAIL

Dear Mr McNicol

**Builders Recycling Operations Pty Ltd – 191 Miller Rd Chester Hill
State Significant Development MP 06_0052 MOD 3**

I refer to the modification request (MP 06_0052 MOD 3) submitted by Builders Recycling Operations Pty Ltd (**the Applicant**) for the expansion of an existing resource recovery facility at 191 Miller Rd, Chester Hill (**the Premises**). The proposal involves the reconfiguration of the site layout, erection of an enclosed waste processing building, and increase of waste throughput from 100,000 tonnes per year of building and demolition waste to 250,000 per year.

The EPA has reviewed the relevant information accompanying the modification application, including report titled, "Modification for the upgrade of the Chester Hill Resource Recovery Facility (MP_0052)" prepared by SG Haddad Advisory and CW Strategic Planning Services, and dated 12 November 2018 (**the Report**).

The EPA has some outstanding concerns in relation to the proposal and is therefore unable to provide its conditions of approval for the proposal in its current form.

Removal of existing stockpiles at the Premises

The Report suggests that the modification application should be assessed on the basis that the current stockpiles at the Premises (being both legacy waste and operational waste) are no longer on the Premises and that the Applicant will continue to engage the EPA to find a mutually agreeable solution for those stockpiles.

The EPA advises that it issued a prevention notice (no. 1557793) to the Applicant on 20 October 2017, after discovering asbestos within the operational stockpile at the Premises. The Notice and subsequent amendment required the operational stockpile to be removed from the Premises by 24 February 2018. To date, that Notice has not been complied with and the contaminated stockpile remains at the Premises, and there is no ongoing agreed strategy between the EPA and the licensee to remove that waste.

The EPA advises that the Notice must be complied with, and any legacy or operational waste at the Premises must be removed and disposed to a facility that can lawfully receive that waste, prior to **any** works commencing at the Premises under the modification (if it is approved).

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Contamination Management Plan

The EPA notes the previous contamination assessments that have been undertaken at the Premises and the presence of contaminated “hotspots” at the Premises that will require management during the construction of the new building. The Applicant has committed to preparing a Contamination Management Plan (CMP) for this purpose. It is likely that further testing and investigation will be needed at the Premises to determine the nature and extent of the contamination and develop appropriate mitigation measures to implement during construction. The EPA requires that the CMP is prepared and provided to the EPA for comment, prior to any works commencing at the Premises under the modification (if approved).

Water management

The EPA requires further clarification about how water, including polluted water, will be managed at the Premises. The EPA considers that any water that has come into contact with waste as polluted water.

The EPA notes that all processing activities will be moved inside the new enclosure including loading and unloading, stockpiling, sorting and processing. The building is now proposed to be fully enclosed rather than the original proposal to have one side open, therefore there will be no direct stormwater from areas that may be affected by contaminants. However, collected stormwater from the roof and potable water will be used to minimise dust inside the building. This includes mist sprays, spraying of stockpiles, use of water to control dust from screens and the conveyor circuit and where necessary, water spraying during the unloading/loading of trucks, when visual dust is generated.

The Environmental Assessment (EA) states that the Operation Environmental Management Plan (OEMP) will include: *“Measures to ensure that any leachate generated within the sheds will be conveyed to closed collection pits/sumps which are to be isolated and pumped out by an authorised liquid waste disposer if required.”* The alternatives are not clear if a pump out by an authorised liquid waste disposer is not required, and this must be clarified by the Applicant.

It would be expected that the types of water use proposed in the building should be managed to a level that would not cause significant runoff or leachate volumes. Any leachate generated, however, may have contaminants at non-trivial levels (compared to high volume stormwater runoff) and should be appropriately managed to prevent discharge to waters, e.g. by preventing discharge via the proposed stormwater treatment and discharge system. Options would include sewer discharge or pump-out to an authorised facility that accepts liquid waste.

The EA has not adequately described the potential volume and quality of the indoor runoff/leachate or its fate. If discharges to waters of runoff/leachate (i.e. polluted water) from within the building is proposed, then the Applicant must conduct a discharge characterisation assessment considering ALL potential pollutants that can be mobilised from waste and the mitigation measures implemented to prevent impacts on surface waters.

The EPA notes that the plan titled, “Stormwater drainage ground floor plan sheet 3 of 4” shows several SWP pits draining into a Pollution Control Device equal to Ecosol Stormpit Class 2. An Ecosol Stormpit Class 2 system is unlikely to be suitable for treating runoff or leachate from materials and activities within the building. This conclusion is based on monitoring data typical of stormwater runoff from materials being handled. The stormwater drainage floor plans are not clear as to whether there are connections from inside the building to the stormwater system, however it appears this is what the plans are indicating. This is not consistent with the EA which described a system where: *“leachate generated within the sheds will be conveyed to closed collection pits/sumps which are to be isolated.”*

It appears that downpipes from the roof are connected into the internal leachate collection system (Stormwater drainage ground floor plan sheet 3 of 4) which is inconsistent with the EA description of: *“leachate generated within the sheds will be conveyed to closed collection pits/sumps which are to be isolated”*. If leachate/runoff generated within the building is not isolated from other stormwater and the stormwater system, then the discharge assessment in the EA is inadequate as it only considers nutrients, total suspended solids and gross pollutants. The proposed indoor runoff/leachate collection

system must be clarified by the Applicant prior to the EPA being able to adequately assess the proposal.

The EPA notes that the “Leachate Collection Tanks” shown on Sheet 1 of 4 are to the north of the “Underground Detention Storage” shown on sheets 3 of 4. The Leachate Collection Tanks are not shown to be connected to anything. The Underground Detention Storage is stated to be for collection of “impervious surface” run off. It is also noted that the “Leachate Collection Tanks” on sheet 1 of 4 are referred to as being for fire services. The EPA requires the Applicant to clarify the purpose of the leachate collection tanks and the underground detention storage and whether they are fully contained or drain to offsite stormwater systems. If it is only roof water and impervious outdoor water that reports to the Underground Detention Storage, then an additional treatment device downstream of the Underground Detention Storage would not be required as this wastewater would be relatively clean and there is a upstream Ecosol Stormpit Class 2 system proposed.

Wheelwash

The EPA notes that the existing wheelwash currently at the Premises will be retained and used for expanded operations. The Applicant must confirm whether the additional truck movements to accommodate the increased throughput will affect the operation and efficiency of the current wheelwash to manage pollutants.

Air quality

The proposed development includes the construction of a new purpose-built facility that would partially enclose sorting and processing activities. The plant will be equipped with dust extraction points for the manual sorting stations and transition points of materials, that will generate ‘excessive dust’. The extracted air and exhaust air from the wind sifters will be filtered through a bag house before being vented to atmosphere. Additionally, a dust suppression misting system will be in use, at various points along the process flow and the entry and exit points of the building, to minimise dust emissions on the site.

The assessment has not considered the point source emissions from the baghouse which may include particulates and Type 1 and 2 metals. No design specifications or performance guarantees were provided to determine if the baghouse design is fit for purpose.

Emissions from shredder

Section 5.3 of the assessment, lists the site operations that have the potential to generate air emissions. Shredder operating is included in the list. However, the assessment provided no detail on the shredding operations proposed, nor does it estimate emissions from the shredder and include shredding operations as a source in the model.

Emissions from paved roads

The site is currently unpaved aside from the drive-way separating BRO with neighbouring business GQM Logistics. The emissions estimation used in the assessment have assumed all haul roads, into and out of the facility are paved. However, it is not explicitly stated in the assessment that the mitigation measures include sealing all haul roads.

The EPA requires that the assessment be revised to incorporate all emission sources including but not limited to the baghouse and shredder. All proposed control or mitigation measures, including paving the haul roads, should also be detailed in the assessment.

As the EPA is seeking clarification in relation to the proposal, the EPA advises that it is unable to issue conditions of approval for the proposal in its current form.

If you have any questions regarding this matter, please don't hesitate to contact Deanne Pitts on 9995 5752.

Yours sincerely

A handwritten signature in black ink, appearing to be 'CF' followed by a large, stylized loop and a trailing line.

19 December 2018

CELESTE FORESTAL
Unit Head Waste Compliance
Environment Protection Authority