

Mr Ernest Dupere Director Benedict Recycling Pty Ltd PO Box 431 Frenchs Forest NSW 1640

20/12/2019

Dear Mr Dupere

#### Girraween Waste Recycling Transfer Facility (SSD-9766) Response to Submissions

The exhibition of the development application including the Environmental Impact Statement (EIS) for the above proposal ended on 18 December 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.

Please note, the Department is still awaiting comment from Cumberland Council, Roads and Maritime Services (RMS), Fire and Rescue NSW, Sydney Water and SafeWork NSW. Comments will be forward to you upon receipt by the Department.

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. In addition, the Department has also provided comments on the EIS (Attachment 1). Please provide a response to the issues raised in these submissions by Friday 21 February 2020.

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.

If you have any questions, please contact Shaun Williams, who can be contacted on (02) 8275 1345/ at shaun.williams@planning.nsw.gov.au.

Yours sincerely

Pateto

Chris Ritchie Director Industry Assessments

as delegate for the Secretary

Attached: Attachment 1 – Department Comments

# ATTACHMENT 1

## **Department Comments**

## Process

1. Provide a more detailed breakdown of the waste recycling process carried out on site, including timeframes for each individual component of the process.

## **Hours of Operation**

- 2. Detailed justification is required for the extended hours of operation proposed which includes:
  - waste acceptance for 24-hour periods, on Sundays and Monday to Friday;
  - dispatch between 10:00pm and 6:00am on Monday to Friday.

You are required to provide the following:

 an assessment of the extended hours of operation as they relate to the site's processing and storage capacity.

## Operation

- 3. Provide further details of the method of loading and removal of outgoing material. This is to include a description of the:
  - location of trucks used for loading; and
  - frequency and method of loading.
- 4. Provide details of the expected quantities of material that will be recycled and sent to landfill per annum for each waste stream.
- 5. Provide the following information for the peak period/s anticipated:
  - length of time between arriving on site (queuing to access weighbridge) and exiting the site at peak time/s; and
  - differences between weekdays and weekends.
- 6. Detail how peak times in relation to delivery will be managed. Provide details of the maximum safe capacity of the site in terms of vehicles and people, how often the site's capacity would be reached, measures to manage the site to ensure safe operations should this capacity be reached.
- 7. Provide plans showing the swept paths of the front-end loader proposed to be used to move waste onsite and vehicles used for waste collection. The plans should include the stacking of

vehicles within the site to demonstrate there is sufficient space onsite at peak periods for all the required operations to be carried out in unison.

- 8. Detail how the weight of waste delivered by light vehicles would be determined.
- 9. Based on the proposed processing capacity, peak delivery times and the duration of time the truck is onsite, provide a worst-case scenario of vehicle stacking onsite. This should be in the form of a scaled plan.
- 10. Provide further details regarding the proposed operational measures to manage traffic arriving at the site during an emergency plant shutdown or similar.
- 11. The EIS should provide the average waste disposal and collection time per vehicle. The total time required for waste disposal and collection activities must account for trucks manoeuvring on the site and waiting to unload.

#### Waste

12. The EIS also states that vegetative waste will be monitored daily for signs of composting, specified as odour and increased temperature. Detail how odour and temperature would be measured and what are the thresholds for removing the waste. Provide justification for waiting for vegetative waste to compost and smell before removing from the site.

#### **Unacceptable Materials**

13. Specify the procedure for inspecting incoming waste and identifying suspected contaminated loads. Section 2.2.5 notes a preliminary inspection of incoming waste will be undertaken and suspected contaminated loads will be rejected, but what is the criteria of a 'suspicious load' and how is it identified during the inspection?

#### Weighbridges

During site inspection undertaken on 11 December 2019 by DPIE staff, the Applicant advised the existing weighbridge would be repurposed for the project. The EIS states in Section 2.1.2 that four new weighbridges will be installed for the site. Please confirm the number of new weighbridges to be installed.