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Sender's ref. DA 205-08-01 MOD 5

Mr Kelly McNicol
Team Leader Infrastructure Assessments
Department of Planning and Environment
Level 22, 320 Pitt Street
SYDNEY NSW 2000

STANDARD POST
10 May 2017

Attention: Sheelagh Laguna

Dear Mr McNicol

**Exhibition of Modification request for the Clyde Waste Transfer Terminal
(DA 205-08-01 MOD 5)**

Veolia Environmental Services (Australia) Pty Ltd has submitted a modification application ("the Proposed Modification") for its Clyde Waste Transfer Terminal at Part Lot 201. DP 1007683 – 322 Parramatta Road, Auburn.

The Proposed Modification seeks to:

- Increase the annual waste input rate from 500,000 tonnes per annum to 600,000 tonnes per annum;
- Change traffic access arrangements via Parramatta Road; and
- Remove the requirement for a community consultative committee.

On 20 April 2017 Department of Planning and Environment (DP&E) wrote to Environment Protection Authority (EPA) requesting comment upon the proposed modification. EPA has reviewed the Environmental Assessment documents exhibited with the Proposed Modification and is not able to make an adequate assessment of the proposal due to insufficient information. The following comments details the EPA's request for further information.

Clarification of the Proposed Modification Documentation

The Wilkinson and Murray *Noise Impact Assessment* and *Air Quality Impact Assessment* supporting the Proposed Modification make the similar assumption that:

"The 20 percent increase in annual throughput of waste through the Clyde Terminal will not result in more waste being placed in the transfer building at any one time. Instead, the

increase will be achieved through an increase in the length of time, during which, the transfer building is operating at its current peak load... Therefore, the Proposal is not anticipated to increase noise emissions of the Transfer Building beyond that of the current operations.” p11. Wilkinson Murray 16387-N January 2017.

And:

“The Proposal will increase the annual average waste throughput for the Clyde Terminal, but will not increase the peak amount of waste in the transfer building and will therefore not affect the existing worst-case odour emission rate of the facility.” p6. Wilkinson Murray 16387-A February 2017.

The EPA concludes from these comments that both Wilkinson Murray Impact Assessment's for the Proposed Modification were predicated upon the assumption that the current peak activity would not increase, but rather the duration of this peak would increase.

Table 8 on p 22 of the SG Haddad Advisory Environmental Assessment March 2017 demonstrates that under the Proposed Modification the “Maximum Average Waste on Floor” described in hourly increments will increase by 20%. This 20% increase is evenly distributed throughout the 24 hour period, including the peak volumes, which Table 8 indicates generally occur between 9am and 5pm.

The EPA concludes from Table 8 that the proposed 20% increase in waste throughput would be achieved by increasing the hourly throughput by 20% and that this increase will be spread evenly throughout the day. This appears contradictory to the above assumptions made by Wilkinson and Murray.

The EPA asks the Proponent clarify what is meant by “*no more waste will be placed in the building at any one time*” in this regard.

The Environmental Assessments do not consider the 20% increase applied to the loading of waste out of the building floor, compressing of waste into the containers, the carrying and stacking of containers for external storage and shipment by train will increase. The potential impact from the increase in these activities should be assessed, or further information provided to support the proponent's assertion that the proposal will not have significant environmental impacts (such as odour, noise etc)

Additional information required to make an adequate assessment of the proposal includes:

- Will the Proposed increase in “Maximum Average Waste on Floor” mean that waste sits longer in the building? and
- Will waste accumulate in the building above that of the current activity?.

Section 1.4 of S G Haddad Advisory Environmental Assessment March 2017 states that waste processing times will increase from 16 hours per day to 20 hours per day on week days. This may impact air and noise emissions and should be clearly addressed in the Impact Assessments.

Air Impact Assessment

Wilkinson and Murray's *Air Impact Assessment* notes that “*the design of the forced ventilation system at the Clyde Terminal is based on dispersion modelling conducted in support of the upgrade to the forced extraction system approved in 2007*”. The number of Community complaints regarding air emissions from the Premises is historically low. The Proposal refers to this and relies upon the previous assessment of emissions to justify not undertaking further assessment of air emissions for the Proposal.

The original proposal included filtration upon stack emissions from the Building. These filters were removed by Veolia for operational reasons. The removal of these filters may alter the previously modelled dust and odour emissions from the Premises, including the stack emissions.

The EPA believes that the potential for odour and dust emissions from the Proposal should be re-assessed including the stack emissions given the increase in waste throughput and the historic alteration of the original air emission treatment infrastructure. The assessment should be conducted in accordance with the EPA *Approved methods for the sampling and analysis of air pollutants in NSW* and *Approved methods for the modelling and assessment of air pollutants in NSW*.

Noise Impact Assessment

Section 4 of the Wilkinson and Murray *Noise Impact Assessment* assesses the existing noise impact from the Premises. Wilkinson and Murray note they have undertaken components of this assessment in accordance with the EPA *Industrial Noise Policy*. Section 4.1 regarding Attended Monitoring Locations relies upon a number of assumptions upon which conclusions are drawn regarding potential impact at monitoring points.

Wilkinson and Murray rely on the original assessment produced for the 2001 proposal. It is unclear whether relevant conditions in the area have changed since then. The EPA notes that the public exhibition of the proposal on the DP&E website includes comments from members of the community. These include that residential development will soon be established closer to the Premises.

It is unclear whether the increased rate of waste throughput will affect the noise emissions from the increase in loading of waste out of the building floor, compressing of waste into the containers, the carrying and stacking of containers for external storage and shipments by train.

The EPA requests the Proponent address these matters in a revised assessment made in accordance with the EPA *Industrial Noise Policy*.

Community Consultative Committee

The environmental Assessment (p14) notes that “*Veolia has documented a lack of interest in the continuation of Clyde CCC from relevant stakeholders. This culminated in a resolution in September 2009 to terminate the CCC which was unanimously supported by CCC members (motioned by the former Auburn Council and seconded by Manildra Group – a neighbouring industrial site within the Clyde Marshalling Yards). Veolia has attempted to facilitate the continuation of the CCC since then but with significant difficulty, as previously advised to DPE.*”

The EPA notes that the public exhibition of the proposal on the DP&E website includes comments from members of the community. These include that residential development will soon become closer to the Premises and that potential noise and odour impact from the activities at the Premises may increase with the 20% increased throughput of waste.

Section 45 of the POEO Act requires the EPA to consider community comments when assessing a proposal. Whilst this does not constitute community consultation for purposes of that Act, the EPA recommends that the Community Consultative Committee be retained subject to future review should the patronage of the committee continue to reflect the Proponents concerns.

Yours sincerely



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Environment Protection Authority