

Your ref: SSD 6767
File no: MC-14-02158

14 June 2016

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

Attention: Emma Barnet

Dear Ms Barnet,

**Re: SSD 6767 Proposed Liquid Waste Treatment Facility at Lot 123 DP
870988, 14 Rayben Street, Glendenning**

I refer to your correspondence dated 13 April 2016 requesting that Council provide comments on the proposed State Significant Development lodged under Part 4 of the *Environmental Planning and Assessment Act 1979* ("the Act") for the above proposal.

The proposal has been reviewed by Council officers and a range of issues have been raised and listed in **Attachment A** to this letter, which are requested to be addressed to Council's satisfaction by the proponent before any determination of the proposal is made by the Department.

If you would like to discuss this matter further, please contact me on 9839 6228.

Yours faithfully,



Judith Portelli

Manager Development Assessment

ATTACHMENT A

The following recommendations are outlined below:

Planning Matters

1. As the existing landscaping within the street setback area is limited, the proposal is recommended to provide additional landscaping in order to improve the presentation of the site as viewed from the public domain. Also provide details of fencing and gates along the street boundary.
2. The swept turning paths for large vehicles entering and exiting the site appear to rely on areas where vehicles park along Rayben Street. Confirm that the vehicles which are to access the site are capable of entering and exiting the site clear of such obstructions.
3. Identify the storage location of the waste bins which are to service the site and ensure that they are appropriately screened as viewed from the public domain.
4. The Environmental Impact Statement (EIS) states that if waste does not comply with the licensed acceptance criteria, it is returned to the client or to an appropriately licensed facility.

It is considered appropriate that this assessment should be undertaken when the waste is collected in the first instance, and therefore it is not necessary for this waste to be taken to the subject site. Please confirm if this process can be improved to avoid unsuitable waste entering the site.

5. The EIS states that the odour procedures for an odorous load are to close the doors, douse odour with a neutraliser, identify the waste source, investigate and in future that loads from this source will be pre-treated or diverted to another waste facility.

This process is considered to be insufficient as this issue should be identified at the source and prior to the waste being processed on the site.

Please confirm which alternate facilities are capable of receiving such odorous items.

Also please confirm if this site is also an 'alternate facility' for waste loads which are not accepted elsewhere due to adverse odorous impacts.

Please confirm if this process can be improved to avoid unsuitable and odorous waste being processed on the site.

6. The EIS identifies that if preliminary assessments and samples are taken and used oil does not meet the acceptance criteria, that it is unloaded to the 20kL non-compliant product tank. However, the EIS also identifies that all waste is evaluated prior to collection to avoid such an occurrence.

Please confirm the process to evaluate non-compliant oil is capable of identifying non-compliant oil, and also confirm the potential for such oil to be transferred to an alternate facility as opposed to be stored on-site.

7. We request that a record / log is kept which details odorous loads which are received on site and the mitigation measures which are implemented. The purpose of this is to ensure that the process of avoiding such risks is continually improved to protect the amenity of surrounding properties and ensure accountability.
8. Confirm if the buildings require any kind of air treatment mechanism to protect the amenity of surrounding properties.
9. If a truck has been washed down due to a spill, or similar, confirm if the egress pathway of that truck requires a form of treatment to ensure contaminated materials are not taken off-site.