



DOC16/192801

Ms Leanne Grove
DA Coordinator
Priority Projects, Key Sites & Industry
GPO Box 39
SYDNEY NSW 2001

EMAIL

2 May 2016

Dear Ms Grove,

ResourceCo Resource Recovery Facility Wetherill Park SSD 7256

I am writing in response to the Department of Planning and Environment's ("DoPE") request for the Environment Protection Authority ("EPA") to review State Significant Development ("SSD") Application No.7256.

I understand that ResourceCo RRF Pty Ltd ("the Proponent") is seeking development consent to establish a waste and resource management facility at No.35-37 Frank Street, Wetherill Park ("the Premises"). The facility proposes to process waste material to produce Processed Engineering Fuel (PEF) and other reusable commodities including aggregates, metal, timber and soil.

After reviewing the EIS and technical reports, the EPA has determined that the application does not meet the Secretary's Environmental Assessment Requirements and the EPA is unable to recommend approval of this proposal in its current form.

The EPA requires additional information to be included in the EIS for the EPA to be able to properly assess impacts of the project. Please refer to Attachment A for details of the issues identified in the application provided.

The EPA has reviewed the following documents:

- *Volume 1 Environmental Impact Statement Waste And Resource Management Facility SSD 15-7256 ResourceCo Pty Ltd 35-37 Frank Street Wetherill Park*, prepared by Nexus Environmental Planning Pty Ltd, dated 8 March 2016
- *Waste And Resource Management Facility Air Quality Impact Assessment Report No. 15278-AQ Version A*, prepared by Wilkinson Murray Pty Limited, dated 28 January 2016
- *Frank Street, Wetherill Park Waste & Resource Management Facility Noise Impact Assessment Report*, No. 15278-N Version A, prepared by Wilkinson Murray Pty Limited, dated 28 January 2016
- *Waste and Resource Management Facility Surface Water Assessment*, prepared by Advisian, dated 27 January 2016
- *Architectural Plans* prepared by Bell Architecture dated 27 January 2016.

If you have any questions regarding this matter, please contact Melissa Ward on 9995 5747.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Spitts.' with a large, stylized 'S' and a period at the end.

DEANNE PITTS
A/Unit Head Waste Compliance
Environment Protection Authority

Contact officer: MELISSA WARD
(02) 9995 5747

Attachment A

State Significant Development (“SSD”) 15_7256 has been submitted to the Department of Planning & Environment’s (“DoPE”), seeking development consent to establish a waste and resource management facility at No.35-37 Frank Street, Wetherill Park (“the Premises”). The EPA has reviewed the Environmental Impact Statement provided. We have determined that the Environmental Impact Statement (“EIS”) does not contain sufficient information for the EPA to adequately assess the impacts of the proposed development. The EPA requires the following additional information.

1. Energy from Waste

The application provides limited information to demonstrate compliance with elements of the *NSW Energy from Waste Policy* (“the Policy”) that apply to Processed Engineered Fuel (“PEF”) proposals. EPA requires the following additional information to allow an assessment of the proposal under the Policy:

- i. Additional information on each waste stream to be received at facility including:
 - a. quantities - maximum volume of each waste type to be stored onsite at any one time and the maximum throughput of each waste type;
 - b. specifications;
 - c. suppliers;
 - d. upstream management procedures (to support waste specifications and controls for non-conforming wastes as well as PVC and hazardous materials); and
 - e. current destination for each waste stream.
- ii. Demonstrated compliance with resource recovery criteria in Table 1 of the Policy for each waste stream.
- iii. More information on contaminated material management of waste inputs including:
 - a. detailed information on procedures for hazardous material identification and removal;
 - b. controls and management for the removal of halogenated substances (including PVC materials); and
 - c. quarantine and management protocols for identified hazardous materials.
- iv. Additional information on the halogenated substances contained in the PEF including laboratory test results of current residual waste to landfill and expected PEF material post processing. Facilities in NSW using the PEF will be required to demonstrate the content of halogenated substances in waste fuels and Group 6 emissions standards within the *Protection of the Environment Operations (Clean Air) Regulation 2010*, as outlined in the Technical Criteria of the Policy.
- v. PEF is not being used on site and no information on the destination for this material is provided. More information is required to detail contingency management plans for the PEF material. For example, failure of pickup and transport, resulting in stockpiling of PEF.
- vi. Specific export requirements apply to the export and transport of waste materials. The Proponent must ensure that they comply with all relevant requirements.
- vii. More information to describe how the development is consistent with the aims and objectives in the *NSW Waste Avoidance and Resource Recovery Strategy 2014-2021*.

2. Noise

The EPA has reviewed the Noise Impact Assessment (“NIA”) and requires the following additional information:

- viii. The proposed site is to operate mainly during daytime and evening hours, however some activities will occur during the early morning and night-time periods. As such we require the

Proponent assess any potential sleep disturbance impacts. There may be a potential for short-term noise events from activities such as dumping onto the tipping floor, shredding, and metal-on-metal impacts. There may also be some potential for explosive events from gas bottles in the incoming waste stream. The sleep disturbance assessment must also detail how short noise events term and the potential for gas bottle explosions will be managed and, if necessary, mitigated.

- ix. Noise monitoring has only been carried out at Res 1 – Maugham Crescent. It is possible that the background noise levels at Res 2 – Hassel Street and Res 3 – Chifley Street will be lower than those at Res 1 as they are further removed from the traffic noise influence of The Horsley Drive. Background noise levels at Res 2 and 3 should be considered.
- x. It is unclear how the criteria for evening and night-time periods at receiver Res 1 were derived in Table 4-3 of the NIA. The Proponent must provide an explanation for the derivation process in the text accompanying the table.
- xi. The NIA identified prevailing westerly winds in Section 5.1, however Section 4 states that a highest tenth percentile modelling approach was used in the assessment. The report must clarify which method was used to predict noise emission levels under adverse meteorological conditions.
- xii. Table 7-2 of the NIA states that the daytime construction noise management level is 58 dBA for receivers Res 1 to Res 4. As the daytime rating background level for Res 1 is 47 dBA, this value must be revised to 57 dBA.

3. Air

The EPA has undertaken a review of the Air Quality Impact Assessment (AQIA) and requires that the AQIA and notes that the assessment is incomplete. There is no estimation of impacts to the air environment from construction (being earthworks and building) of the proposal. The Proponent must include construction impacts in their assessment.

4. Water

The EPA has reviewed the EIS and determined that additional information is required to ensure that all water pollution risks are identified and appropriately managed.

Stormwater / wastewater / leachate management systems

It is unclear how wastewater from material processing or leachate from waste stockpiles will be managed. The EIS indicates that water will be used for waste processing, namely dust suppression, however the fate of this process water is unclear.

The EIS includes a proposed treatment train but it is unclear if this only applies to stormwater. As there will be a range of materials stored and processed at the Site there is potential for a range of non-trivial pollutants to be potentially present in process water. The proposed stormwater pollution control system would be unlikely to adequately treat pollutants other than those typically found in stormwater.

Further information is required to demonstrate how contaminated run off will be managed and appropriately disposed of. If a discharge is proposed further information is required regarding how contaminated runoff will be treated to an appropriate level prior to discharge. The Proponent must clearly demonstrate:

- xiii. how stormwater and contaminated runoff will be managed, including:
 - a. areas that discharge direct to stormwater (e.g. carpark; roofs); and
 - b. areas that receive contaminated runoff;
- xiv. how leachate and process water will be managed, including detail of the fate and treatment of any contaminated water and the practical measures that will be taken to ensure it does not enter stormwater infrastructure.

Potential impacts on watercourses and groundwater

The EPA understands that discharges will potentially occur from the sediment basin and a stormwater drain at the southern boundary of the Premises. However it is unclear if the sediment basin will only receive stormwater. If the sediment basin is to receive wastewater from the premises the Proponent will need to consider all pollutants potentially present that pose a risk of non-trivial harm to human health or the environment and assess the potential impacts on receiving waters.

In addition the proponent has not considered the environmental values of Prospect Creek or the practical measures that could be taken to restore or maintain those values.

The EPA requires the EIS includes an assessment of the impact of any proposed discharge from the Premises including:

- xv. characterisation of the water, identifying all pollutants that pose a risk of non-trivial harm to human health or the environment, including their concentrations and loads;
- xvi. an assessment of the expected frequency and volume of discharges;
- xvii. an appraisal of the practical measures that can be taken to prevent, control, abate or mitigate the pollution and protect the environment from harm;
- xviii. a description of the receiving environment, including the environmental values of the receiving waters affected by any discharge and the practical measures that could be taken to restore or maintain those environmental values; and
- xix. an assessment of the nature and degree of impact that any proposed discharge will have on the receiving environment. This must include consideration of the indicators and associated trigger values or criteria for the identified environmental values with reference to ANZECC (2000) Guidelines.

Site Water Balance

The water balance detailed in the EIS focusses on the water demands of the proposed facility rather than water outputs. In addition, there appears to be no analysis or statement regarding the volume and frequency of overflow discharges. The EPA requires that the EIS includes:

- xx. a comprehensive water balance which quantifies all water inputs and outputs including, but not limited to, the water used in processing the waste.