



Our ref. DOC17/254763-08
Sender's ref. SSD 7401

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NSW Planning & Environment
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SYDNEY NSW 2001

STANDARD POST & EMAIL
5 June 2017

Attention: Kate Masters

Dear Ms Masters

Bettergrow Resource Recovery Facility, Wetherill Park, (SSD 7401) - Response to Notice of Exhibition

I refer to your letter dated 28 April 2017 seeking the Environment Protection Authority's (EPA's) comment on the publicly exhibited Environmental Impact Statement for the State Significant Development Proposal for a resource recovery facility (the Proposal) at 24 David Road, Wetherill Park (the Premises) in the Fairfield Local Government Area.

Background

Bettergrow trading as 'Greenspot' proposes to develop and operate the Premises, which would process up to 200,000 tonnes of waste per year, comprising approximately 70,000 tonnes of garden organics/FOGO; 60,000 tonnes of drilling muds and fluids; 40,000 tonnes of bulk landscape material; and 30,000 tonnes of commercial and industrial organic materials.

End products would be transferred either to end use markets or to other facilities for value-adding to maximise beneficial re-use. Processing is limited to separation of materials.

EPA cannot recommend approval of proposal

The EPA has reviewed the Proposal and cannot recommend the Proposal as there is insufficient information provided in the areas of odour, air quality and contamination to make an adequate assessment of the Proposal. Please see the reasons set out below.

Odour

Organic waste can produce significant of odour. Proposed odour management includes:

- All organic material received and processed in enclosed buildings.
- Buildings vented through stacks with carbon filters and fitted with fast-closing roller doors.
- Receival over all hours to minimise fugitive emissions.
- Use of a proprietary inoculant to reduce odour.

Assessment of potential odour impacts found boundary concentration of odour below the impact assessment criterion of 2 odour units, even for upset conditions with reduced efficiency of the carbon filters. Filter performance is listed as 99.9% based on manufacturer's guarantee.

The EPA has assessed whether the assumptions regarding odour removal by the carbon filter are realistic and makes the following recommendations in relation to this aspect of the proposal.

The EPA advises that further information is needed to assess the odour mitigation measures

- Statement or guarantee from the manufacturer that the filters achieve 99.9% odour removal for the types of odours to be generated.
- Justification for the assumption that 90% efficiency of the filters is "conservative" including description of the behaviour of the filter as it fills.
- Explanation of how the VOC breakthrough alarm relates to filter performance – behaviour of the filter and relationship between odour and measured VOC.

The EPA further recommends the proponent consider what additional measures might be available should the proposed mitigation fail to achieve desired performance

Page 15 of the odour assessment (Appendix 8) states that 'potentially odorous air from within the Food Depackaging Building will be ducted to the Organic Receival and Processing building where it will be mixed and treated by the carbon filtration unit to release into the atmosphere. However, the figures do not show the ducting or the stacks, are the 8 carbon filters enough to service two buildings.

Air Quality

The Applicant has not conducted an air quality assessment for particulate matter. As 100,000 tonnes per annum of landscaping materials including sawdust, sands and soils will be stored outside the EPA is of the view that an air quality assessment and mitigation measures should be provided. The justification provided in Appendix 10 appears inadequate.

Contamination

The site was previously an asphalt batching plant owned by Mobil. However, no Remediation Action Plan or Site Audit Statement has been completed for the site. Some parts of the site have been remediated but there are several areas which have not been investigated (see page 17 of the Douglas Partner (DP) report (Appendix 14)). This appendix was supplemented by a letter from DP (Appendix 15) which concludes the site is suitable for the intended use subject to targeted soil investigations being conducted.

If you have any questions about the EPA's assessment, please contact me on 9995 5646.

Yours sincerely



TREVOR WILSON
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Environment Protection Authority