



DOC16/357994-01

Ms Kate Masters
A/Team Leader
Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

EMAIL & STANDARD POST

Dear Ms Masters

I am writing to you in relation to the proposed expansion of the Hearne St Mortdale Resource Recovery Facility (SSD 7421), from 30,000 tpa to 300,000 tpa. It is also proposed to permit waste movements in and out of the facility 24 hours per day.

The Environment Protection Authority ("EPA") has reviewed the information provided and has determined that it does not have sufficient information to adequately assess the potential impacts from the proposal. Therefore, the EPA is unable to provide recommended conditions of approval at this stage. The EPA's comments are provided in Attachment A.

In relation to potential noise impacts, the EPA advises that the proposed hours of operation differ from those in the Hurstville Development Control Plan No. 1 and therefore DPE should consider whether the proposed hours are appropriate for the area. Similarly, DPE should consider whether to include a condition on any approval which prevents trucks associated with the project from using Barry Avenue at any time of day. Further details in relation to these points are provided in Attachment B for DPE's consideration.

The EPA advises that it is still finalising its assessment of the Air Quality Impact Assessment and will provide any comments in relation to that assessment as soon as possible.

If you have any questions in relation to this matter, please contact Deanne Pitts on (02) 9995 5752.

Yours sincerely

A handwritten signature in black ink, appearing to read 'CF', with a stylized flourish.

29 August 2016

CELESTE FORESTAL
Unit Head Waste Compliance
Environment Protection Authority

Att: Attachment A – EPA's comments
Attachment B – EPA comments for DPE

ATTACHMENT A – Comments for Proponent

The EPA has reviewed the documents placed on Public Exhibition for the expansion of the resource recovery facility at Hearne St, Mortdale from 30,000 tpa to 300,000 tpa. It is also proposed to permit waste movements in and out of the facility 24 hours per day.

The Proponent has not provided sufficient information to adequately assess the potential impacts from the proposal. The Proponent needs provide the following information:

NOISE

The EPA requires some additional information from the Proponent in order to assess potential noise impacts from the proposed expansion of the facility:

- **The Proponent must assess whether the low frequency noise modifying factor would apply to noise from the project, due to low frequency noise from the finger and finlay screen**

The assessment presented a sound power level for the finger and finlay screen of 112 dBA, and later stated that the screen operated at 9 Hz to 13 Hz. The screen may generate significant low frequency noise, which does not seem to have been accounted for in the assessment.

The Proponent must assess whether the low frequency noise modifying factor should be applied to predicted noise levels.

- **The Proponent must confirm whether truck movements were included in the noise model for the shoulder period**

The morning shoulder operational scenario modelled for the assessment does not appear to include truck movements, even though the assessment stated that trucks would access the site 24 hours a day, and would leave the site in the shoulder period. If trucks were not included in the shoulder period model, then noise levels could have been under predicted by 3 dBA at some receivers.

- **The Proponent must provide predicted L_{Amax} noise levels for the shoulder period, and check that predicted L_{Amax} levels for the night period are correct**

The predicted operational noise levels did not include L_{Amax} noise levels in the shoulder period, and the predicted L_{Amax} levels for the night period were often only 2 – 3 dBA higher than the predicted night time $L_{eq(15min)}$. This may be due to transcription errors, or use of the wrong sound power levels for maximum noise events. Maximum sound power levels were not presented in the assessment.

WATER

In relation to potential water impacts, the EPA notes that the risks to waters will be largely managed by the proposed leachate and stormwater controls, but some residual risk remains as the Proponent has not:

- characterised the stormwater discharge quality;
- estimated the discharge pollutant loads;
- adequately demonstrated the performance of the proposed stormwater treatment system;
- provided details of maintenance triggers and actions for the stormwater management system.

The EPA advises that in order to mitigate these risks, it will (as part of the recommended conditions of approval) require that the Proponent develop an Operations Environmental Management Plan (OEMP) in consultation with the EPA prior to commencement of operations, which will include a leachate management and disposal; maintenance triggers and actions for the stormwater management system; and a stormwater monitoring program. The stormwater monitoring program will characterise the

discharge and provide ongoing assurance that treatment performance is maintained. Further requirements will be outlined in any conditions of approval issued by the EPA.

The EPA notes that the Proponent has proposed that all leachate will be collected in sumps to prevent contamination of stormwater, but the Proponent has not specified how this leachate will be disposed of. Prior to the EPA being able to issue conditions of approval, the Proponent must clarify how leachate will be disposed of (e.g. discharge to sewer).

AIR

The EPA notes that the Proponent has not conducted an odour impact assessment as part of the proposal due to the low likelihood of odour impacts from the proposed activity. The EPA advises that, should the proposed development cause odour impacts, the EPA will require the Proponent to undertake an odour impact assessment as part of an environment protection licence condition (such as a Pollution Reduction Program).

The EPA is still finalising its assessment of the Air Quality Impact Assessment and may provide additional comments in relation to its assessment in due course.

GENERAL COMMENTS

- The EPA requires that the Proponent provide the Construction Waste Management Plan (CWMP) prior to the EPA being able to issue conditions of approval for the proposal. The EPA notes that asbestos will be removed from the site as part of the demolition works and the EPA will require the Proponent to provide it with all disposal records (including but not limited to tip dockets) to demonstrate lawful disposal of the asbestos waste.

ATTACHMENT B – Comments for DPE

Any project approval should include a condition restricting hours of operation, and DPE should consider whether the proposed hours of operation are appropriate for the area

The site is proposed to operate between 6am and 10pm Monday to Saturday, with truck movements between 10pm and 6am not using Barry Avenue. The peak hour for truck movements is expected to occur between 11:30am and 12:30pm. The assessment states that the site will not trade on Sundays and Public Holidays, so a condition of any approval could permit:

- 24 hour truck movements Monday to Saturday, except Public Holidays
- Waste processing activities between 6am and 10pm Monday to Saturday, except Public Holidays
- No activities on Sundays and Public Holidays.

As the proposed hours differ from those specified in Hurstville Development Control Plan No. 1, DPE should consider whether the proposed hours are appropriate for the area.

DPE should consider whether to include a condition on any approval which prevents trucks associated with the project from using Barry Avenue at any time of day

The assessment stated that more than 360 site related truck movements in the daytime, and 70 site related truck movements in the night time would be required to exceed “the relevant criteria”. The traffic assessment for the project suggested that 430 truck movements would occur per day from the project, and the EPA estimates this is about 390 movements during the day time and 40 movements at night.

The assessment stated that 25 heavy vehicles were counted over 15 minutes during attended monitoring on Boundary Road, and assumed that 15 minutes was representative of a whole day. It is unlikely that is the case.

The traffic assessment stated that the project’s typical net increase in traffic will be 226 movements a day and 14 movements an hour. The proposed increase of an average 14 trucks an hour in the day time is likely to add L_{eq} 59 dBA on Hearne Street and Boundary Road, assuming all vehicles travel the same route on those roads to reach the M5: this is the same assumption used in the traffic assessment.

Based on the data provided in the traffic assessment, the EPA estimates the project’s truck movements will increase day time road traffic noise levels on Barry Avenue by about 2 – 3 dBA:

- The EPA expects Barry Avenue currently carries about 109 vehicle movements in the peak hour and 1,090 movements per day ($L_{eq(1hour)}$ 59.3 dBA average and up to $L_{eq(1hour)}$ 61.9 dBA in the peak hour).
- The EPA estimates the project’s truck movements will increase day time road traffic noise levels on Barry Avenue to about $L_{eq(1hour)}$ 62.4 dBA average and up to 63.4 dBA in the peak hour.

Based on the limited data provided in the noise and vibration impact assessment and the traffic assessment, road noise levels on Barry Avenue may exceed the road noise policy criteria for local roads, and the project may increase those levels by more than 2 dBA.

DPE should consider whether it is appropriate to include a condition on any approval which prevents trucks associated with the project from using Barry Avenue at any time of day. For example, signage could be installed prohibiting entry to the site from the south.