ENVIRONMENT PROTECTION AUTHORITY

Our reference: DOC15/501192

Ms Kate Masters
Senior Planner - Industry and Infrastructure Projects
Department of Planning & Environment
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SYDNEY NSW 2001

EMAIL & STANDARD POST
7 December 2015

Dear Ms Masters

Transpacific Cleanaway Pty Ltd - Proposed resource management facility
50 Quarry Road, Erskine Park - SSD 7075

I refer to the public exhibition of Transpacific Cleanaway Pty Ltd's proposed Waste Transfer Station at 50 Quarry Road, Erskine Park. Transpacific Cleanaway Pty Ltd has submitted Concept Plan and Stage 1 Waste Transfer Station Environmental Impact Statement volumes 1 and 2 dated October 2015 ("the Environmental Assessment") in support of the proposal.

The EPA has reviewed the Environmental Assessment and found that in a number of instances the information provided is insufficient to allow an adequate assessment to be made of the potential environmental impacts of the proposal. As such, the EPA cannot support this proposal as submitted and therefore, has not provided recommended conditions of consent. The EPA requests that the proponent update the publicly exhibited Environmental Assessment to address the following matters detailed below.

The Proposal

Transpacific Cleanaway Pty Ltd ("the Proponent") proposes to build and operate a Resource Management Facility at 50 Quarry Road, Erskine Park, NSW (Lot 1 DP 1140063) in the Penrith Local Government Area. The proposal involves:

A waste Resource Management Facility with a maximum waste processing capacity of 300,000 tonnes per annum. The proposed RMF will comprise of two sections as follows:

- a **Waste Transfer Station** capable of processing up to 300,000 tonnes per annum of putrescible waste; and

- a **Resource Recovery Facility** that would be capable of processing up to 150,000 tonnes per annum of recyclable material from the **Waste Transfer Station**.

The proposal is in stages. Stage 1 is for the **Waste Transfer Station** comprising of:

- bulk earthworks, demolition of existing buildings and infrastructure;

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- construction and operation of the **Waste Transfer Station** and associated structures; and
- the development of internal roads, weighbridges, stormwater management system and landscaping.

The EPA understands that the proposed **resource recovery facility** is not being built as part of stage 1 and has not had its impacts assessed as part of the Environmental Assessment.

Noise impact assessment

The EPA has reviewed the Construction and Operation Noise Assessment submitted as Appendix B in Volume 2 of the Environmental Assessment. The EPA has no issues of concern in relation to noise associated with the construction or onsite operation of the proposal.

Air quality

The EPA has reviewed the report *Erskine Park Resource Management Facility Staged SSD Stage 1 Waste Transfer Station Air Quality Impact Assessment & Management* dated October 2015 ("the AQIA Report") by SLR Consulting Australia Pty Ltd and submitted as Appendix A of Volume 2 of the Environmental Assessment. The EPA makes the following comments:

I. The AQIA Report has been carried out generally in accordance with EPA guidance in ""*Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*", but contains a number of errors and is not adequate.

II. There is insufficient detail on the air pollution control device in the AQIA Report. This information is essential for the EPA to be able to make an adequate assessment of the potential odour impacts. **Attachment 1** sets out what additional information is required in more detail.

III. The EPA notes that the proposal will be constructed and operated in two stages. Whilst this Environmental Assessment and it's modelling is focused on the construction and operation of stage 1, it is unclear from the modelling if the proposed air controls will have capacity to deal with the increased demands of stage 2. For example if the handling, processes, or temporarily stored volumes of waste are likely to change with the operation of stage 2 then these scenarios must be clearly stated in the modelling. Further, if stage 1 is approved and odour impacts are experienced in it operation, the EPA would be unlikely to support any further expansion to stage 2 until such time as those odour impacts from stage 1 are addressed and the proponent can demonstrate sufficient capacity in the local air shed to warrant such expansion.

    a. The EPA requests that the Proponent provide clear modelling that is inclusive of any changes to stage 1 due to be experienced as a result of the operation of stage 2.

IV. Odour modelling should consider the *cumulative* impacts from the Waste Transfer Station and the Resource Recovery Facility. The EPA notes that the AQIA Report focuses on the potential odour impact from the Waste Transfer Station and does not appear to include potential odour from the Resource Recovery Facility (to be built later). The EPA notes that on page 42 of Volume one of the Environmental Assessment, the Resource Recovery Facility will accommodate a daily volume of approximately 550 tonnes. This volume of waste will be in addition to the waste held in the waste transfer station and as such should be included in the assessment as a specific "combined odour" scenario to be modelled against the 2OU odour assessment criteria.

V. The EPA notes that potential odour generation has been studied at various levels of the proposed 300,000 ton/annum throughput (page 31 of Volume one). The EPA believes it is the volume of material onsite at any one time that is a more significant factor in odour generation.

The EPA notes that table 30 “Anticipated Daily Waste Profile – Normal Operations“ provides hourly estimations of the total amount of waste at the Waste Transfer Station at any one time ranges from 97.3 to 200 tonnes. The EPA’s experience suggests that if there is capacity to store waste onsite it is often used and the proponent should undertake odour modelling for a scenario where the volume of waste onsite is more than 200 tonnes to reflect this.

a. This is important because any commitments made in the Environmental Assessment may be formalised as approval or EPA licence conditions. Consequently, any operational parameter should not be proposed if they are impractical, unrealistic or beyond the financial viability of the development.

VI. The EPA notes that the number of trucks proposed to be loading and unloading per day (see Pg11 of Appendix B) is likely to result in some "fast acting" roller doors being open permanently between 12pm-1pm. at other times the doors are likely to require opening every minute.

a. The EPA requests that the proponent demonstrate that negative pressure can be maintained with 1-2 doors open permanently in the Waste Transfer Facility, or if this cannot be achieved, that the proponent install an airlock hall vented to the air treatment system with sufficient capacity for 4 dual axle collection trucks at any one time.

General

The Proponent should be aware that any commitments made in the Environmental Assessment may be formalised as approval conditions and may also be placed as formal licence conditions. Consequently, pollution control measures should not be proposed if they are impractical, unrealistic or beyond the financial viability of the development. It is important that all conclusions are supported by adequate data.

Based upon the information provided to the EPA, should approval be granted, the Proponent may need to make a separate licence application to the EPA. The Proponent should be made aware that, consistent with provisions under Part 9.4 of the *Protection of the Environment Operations Act* 1997 (“the POEO Act”), the EPA may require the provision of a financial assurance for the site. The amount and form of the assurance would be determined by the EPA and required as a condition of the licence.

In addition, as a requirement of the licence, the EPA will require the Proponent to prepare, test and implement a Pollution Incident Response Management Plan in accordance with Section 153A of the POEO Act.

If you have any further queries regarding this matter, please contact Trevor Wilson on (02) 9995 5646.

Yours sincerely

Trevor Wilson
Unit Head Waste Operations
Environment Protection Authority

Att 1. EPA detailed comments on odour assessment

Attachment 1 – EPA comments on the Erskine Park Resource Management Facility Staged SSD Stage 1 Waste Transfer Station Air Quality Impact Assessment & Management report

1 Operation of the emission control system

"Mitigation and Management" (p7-8) of the AQIA Report sets out the emission control system. This is described as having four parts: containment, internal air management, air pollution control, and emission control.

The design seeks to maintain negative pressure in the building to minimise fugitive emissions. This is achieved by the proposed dilution stacks and rapid acting doors.

Strobic Air Corporation's "Tri-Stack"™ system is listed as the dilution stacks. This system has been designed to provide three air changes per hour from the inlet flow (part A on the diagram in Appendix A of the AQIA Report). Additional dilution is provided by the bypass flow (labelled B), and the entrained flow (labelled C).

It is stated that "system configuration allows for a period of bedding in, such that during the early stages of operation (up to 90 percent of operating capacity, equivalent to 270,000 tonnes per annum) emissions may be discharged via a bypass of the air pollution control device without compromising the amenity of local residents." That is, operation of up to 90 per cent capacity does not need the air pollution control device to reduce emissions.

This approach fails to prevent and minimise air pollution at all times. The EPA advises that air pollution control devices should be operating at all times consistent with clause 128(2) of the POEO Act.

The air pollution control device is described as being designed to "achieve the 'design standard' with the plant operating at full capacity in the 'normal operations' scenario, or during the 'emergency operations' scenario". The only detail provided is the further definition "wet scrubber" in parentheses.

Request for additional information No. 1

The proponent must clarify its commitment to minimising air pollution in the planned operation of the air pollution control device.

Request for additional information No. 2

The proponent must submit further details of the proposed air pollution control device to verify that it is fit-for-purpose and does not impede other elements of the air pollution control device.

2 Assessment of meteorological modelling

The difference in winds between observations from OEH's monitoring site at St Marys and that of the wind field modelling is significant. St Marys data should be used as input for generating wind fields and these then used to repeat the dispersion modelling.

The EPA notes the difference in these winds and attributes this to reduced exposure at the OEH St Marys monitoring station due to a significant building complex blocking flow from the nor-nor-east.

OEH's website does not note obstruction to wind observation for this site.

Figure 14 (page 76) of the AQIA Report intends to show the location of OEH's St Marys monitoring station and the flow obstruction. However, the monitoring station is incorrectly placed in the figure. The monitoring station is a shed in the figure on the north side of the building complex.

Request for additional information No. 3

The EPA requests that the proponent repeat and resubmit dispersion modelling using data from OEH's St Marys monitoring station as an input for generating wind fields.

3 Cumulative assessment

The AQIA Report does not consider impacts from operation of both the existing landfill and the proposed waste transfer station. The EPA recommends that assessment of the proposal include consideration of combined impacts.

Request for additional information No. 4

Assess the local air quality impacts from operation of both the landfill and the proposed waste transfer station.

4 Odour assessment criteria

On pages 6 and 25-26 of the AQIA Report refers to odour criteria as "compliance standard". The EPA does not view odour assessment criteria in this way. The odour assessment criteria are integral to assessment of likely odour impacts which is done from a risk management approach. The performance requirements for operating facilities are set out in the *Protection of the Environment Operations Act* (s 129) – "not cause or permit the emission of any offensive odour from the premises".

Request for additional information No. 5

The EPA requests that the proponent amend text in the AQIA Report to be consistent with the requirements of the POEO Act.

5 Dispersion results

Table 41 (pages 108-112) of the AQIA Report presents incremental and cumulative concentrations of PM_{10} and $PM_{2.5}$. In many cases the concentration of $PM_{2.5}$ is greater than that of PM_{10}. This is aphysical because $PM_{2.5}$ is a subset of PM_{10} and therefore cannot have a greater concentration. Page 7 notes that rather than partitioning particle emissions by size, the total quantity was assigned, in turn, to the three size fractions as a conservative assumption. Thus emissions of $PM_{2.5}$, PM_{10}, and TSP used for the dispersion modelling are the same. Differing dispersion of the particle fractions could, in part, explain the aphysical result.

Request for additional information No. 6

The EPA requests that the proponent clearly explain the consequence of assuming all particulate emissions are, in turn, $PM_{2.5}$, PM_{10}, and TSP with regard to the results of dispersion modelling. The EPA suggests a notation on tabulated results reminding readers of the conservative assumption used.

6 Location of OEH monitoring stations

Table 11 (page 51) of the AQIA Report lists OEH monitoring stations within a twenty kilometre radius of the proposal. The directions from project site are incorrect – it appears that "west" and "east" have been confused for St Marys, Liverpool, and Prospect.

Request for additional information No. 7

The EPA requests that the proponent amend table 11 in the AQIA Report to correctly state the direction of the monitoring stations.