



Our Ref: DOC18/68848-03
Your Ref: SSD 6835 MOD 1

Mr Patrick Copas
Planning Officer - Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

21 February 2018

Dear Mr Copas

I am writing in response to the Department of Planning and Environment ("DPE")'s letter advising the NSW Environment Protection Authority ("EPA") of the opportunity for submissions in response to the Section 96(1A) modification application by Suez Recycling and Recovery Pty Ltd ("the applicant") for the development consent relating to the Lucas Heights Resource Recovery Park, Little Forest Road, Lucas Heights ("the premises").

I understand that the modification proposal seeks to amend the operating hours of the landfill on the premises as follows:

Operating hours	Current	Proposed
Monday to Friday:	6 AM – 5 PM	5AM – 5 PM
Saturday	8 AM – 5 PM	6AM – 5 PM
Sunday	8AM – 5 PM	No changes proposed

The premises is subject to Environment Protection Licence no. 5065 which is held by the applicant for the Scheduled Activities of Waste disposal (application to land), Waste processing (non-thermal treatment) and Waste storage under the *Protection of the Environment Operations Act 1997* ("POEO Act").

The EPA provides the following advice in relation to the proposal, based on the project information available on DPE's Major projects website at http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9006

Further information required

The EPA does not recommend the project is approved by DPE as there is insufficient information in the application to make an adequate assessment of the proposal. Please see the EPA's comments below:

Air Quality

The Environmental Impact Assessment ("EA") contains little to no assessment of air quality impacts. This EA justifies this lack of assessment by stating that "No changes to the quantity or types of waste or operational activities on the site are approved [...] Therefore no additional dust or odour would be generated as a result of the modification."

The EPA does not agree with this assessment. An increase in the operational hours for the facility increases the daily time in which these activities are undertaken, and therefore the cumulative and/or peak environmental impacts and increased exposure opportunities for sensitive receivers.

Additional air quality impacts as a result of increased hours of operation may include:

- dust generated as a result of truck movements,
- increased odour due to more time where landfilling activities are occurring, and
- increased odour due to additional time that waste is not covered.

Increases in generation of odour in early morning periods may have increased impacts due to meteorological effects at this time (e.g. weather inversions). The EPA notes that odour impacts are an ongoing environmental matter of concern for the premises.

The Environmental Impact Statement (GHD, October 2015) for SSD 6835 contains an Odour Impact Assessment within the Air Quality Assessment (GHD, August 2015 - Appendix G). This Odour impact assessment appears to be based on the operating hours of 6AM – 4PM Monday to Friday and 8AM – 5 PM Saturdays and Sundays.

Further information is required to determine the additional air quality impacts due to the increased operational hours proposed. The EPA recommends that an updated Air Quality Impact Assessment is provided that appropriately models the additional air quality impacts of the proposal.

Licensing changes required

Should the development modification be approved by DPE, a variation of Environment Protection Licence no 5065 is required prior to conducting the additional operations proposed. The applicant must apply separately to the EPA for this variation and include all relevant supporting material. Further information can be found on the EPA's website at: <http://www.epa.nsw.gov.au/licensing-and-regulation/licensing/environment-protection-licences/econnect-epa>

The applicant should be aware that any commitments made in the application documents may be formalised as approval conditions and may also be placed as formal licence conditions. It is important that all conclusions are supported by adequate data.

Should you wish to discuss the above matters, please contact Laura Ansted on (02) 9995 6812.

Yours sincerely



TREVOR WILSON
Unit Head – Waste Compliance
Environment Protection Authority