



Our ref: DOC20/933377
Your ref: SSD 8660

Department of Planning and Environment
Industry Assessment
320 Pitt Street
SYDNEY NSW 2000

Bruce.zhang@planning.nsw.gov.au

Attention: Bruce Zhang

By email
11 November 2020

Dear Sir

State Significant Development SSD 6880 – Construct and operate resource recovery facility – 90 Gindurra Road, Somersby

I refer to your email dated 26 August 2020 requesting comment from the Environment Protection Authority (**EPA**) in relation to SSD 6880 (**the Application**). The Application seeks to construct and operate a resource recovery facility to process 200,000 tonnes per annum of soils and building and demolition waste at 90 Gindurra Road, Somersby.

In addition to comments the EPA provided to you on 6 November 2020, the EPA makes the following additional comments on the Water Quality Impact Assessment (**WQIA**).

The WQIA refers to the construction and use of Floating Treatment Wetlands to treat or improve water quality prior to discharge. The EPA is concerned about the lack of evidence about the ability of the Floating Treatment Wetland to carry out its intended function. This is highlighted in the following statements taken from the WQIA:

"We note that we have not modelled the benefit of the proposed floating wetlands in the MUSIC model because it is believed that the science behind the FTWs is still in its infancy and needs further research under a broader range of conditions prior to the models being considered rigorous. Research to date has not measured the performance under a configuration such as the one proposed in this project where the pond is also used for stormwater harvesting. Research to date has focussed on measuring performance in a water quality pond where the water level was mostly static. In this project the water level in the pond will fluctuate considerably."

"In conclusion at this time there is a lack of suitable scientific data available with which to model FTWs as proposed on this project. Results in this report are therefore to be considered somewhat conservative."

In carrying out its licensing function, the EPA must consider the pollution caused or likely to be caused by the activity and the likely impact of that pollution on the environment in accordance with section 45 of the *Protection of the Environment Operations Act 1997*.

Therefore, the EPA requires additional information (i.e. proof of concept) from the applicant in respect of the proposed Floating Treatment Wetland and its ability to prevent, control, abate or mitigate pollution caused by the construction and operation of the proposed waste facility.

If you have any further queries regarding this matter, please contact Sean Joyce on (02) 4908 6897.

Yours sincerely



STEVEN JAMES
Unit Head Regulatory Operations Metro North
Environment Protection Authority