



EPA Reference: DOC20/707812-106

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Dear Ms Laguna

Proposed expansion of Fairfield Sustainable Resource Centre (SSD-8184) – Corner of Hassall Street and Widemere Road, Wetherill Park NSW 2164 – Additional EPA comments

I refer to the Public Authority Consultation's request (PAE-9063531) for the NSW Environment Protection Authority's (EPA) advice on the Environmental Impact Statement (EIS) for the proposed expansion of the Fairfield Sustainable Resource Centre at the Corner of Hassall Street and Widemere Road, Wetherill Park (SSD-8184)(the proposal).

In addition to the EPA's comments emailed to the Department of Planning, Industry and Environment (DPIE) on the 24 September 2020 (EPA Ref: DOC20/607708-26), the EPA advised DPIE that it required additional time in order to review any potential contaminated land issues for the proposal. The EPA has since identified various contaminated land issues that require attention, and its advice is outlined below. In determining this response, the EPA reviewed the following documents:

- *Environmental Impact Statement – SSD 8184 Fairfield Sustainable Resource Centre – Hassall Street and Widemere Road, Wetherill Park*, dated 25 August 2020, prepared by DFP Planning Pty Limited. (EIS)
- *Detailed Site Investigation - Fairfield Sustainable Resource Centre Expansion*, dated 24 August 2020, prepared by WSP. (DSI)
- *Leachate Assessment - Fairfield Sustainable Resource Centre*, letter dated 27 July 2020, prepared by WSP

Assessment of EIS against SEARs

The EPA's response to Secretary's Environmental Assessment Requirements (SEARs), dated 6 May 2019, required an assessment of potential impacts to soil and water resources, topography, hydrology, drainage lines, watercourses and riparian lands on or nearby to the site. Specifically, the EPA expected the following requirements on potential contamination issues be addressed in the EIS:

- The description of the proposal to outline cleaner production actions including those of soil contamination treatment and prevention systems;

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- The EIS needed to include details of site history (if earthworks are proposed) so as to consider possible soil contamination (for example, if the site was previously a landfill site or if irrigation of effluent has occurred);
- Provide any details that are needed to describe the existing situation in terms of soil types and properties and soil contamination.

Further information needed to justify not undertaking remediation works

The EIS included a DSI which identified some contamination in the groundwater beneath the expansion area which was likely contaminated by the landfill leachate. The standing water in the gully and the samples of Prospect Creek also found metals and hydrocarbons present. Section 6 of the EIS stated that there is potential for human health or ecological risk to downgradient surface water receptors due to benzene, naphthalene and some metals. The EIS claims that no remediation is necessary since no human health risk to the future users of the site was identified.

The EPA believes there is insufficient evidence to support the statement that remediation is not required to facilitate the proposed expansion and the continued use of the land as a sustainable resource centre, especially since groundwater is suspected to be contaminated by leachate from a former landfill at the site. Further information is required to determine the nature and extent of groundwater contamination and management measures that need to be in place to ensure surface water and groundwater will not be further contaminated by leachate. This additional information should include a plan that clearly shows inferred groundwater flow direction and the location of the former landfill in relation to the licenced facility and the proposed expansion project.

Hazardous Ground Gases

Hazardous ground gases from the former landfill site has not been considered in the information provided. The potential human health risk from this source will need to be assessed by the proponent.


Response to submissions

Due to potential risks (and data gaps) in the EIS and DSI, the EPA is unable to recommend Conditions of Consent at this stage. To further assess this proposal, the Applicant must submit interim audit advice from a NSW accredited site auditor commenting on the leachate assessment, the nature and extent of the contamination (including hazardous ground gas) and what further works are required to ensure that the site is suitable as a sustainable resource centre. This interim audit advice should also include a map that clearly shows inferred groundwater flow direction and the location of the former landfill in relation to the licenced facility and the proposed expansion project.

Due to the potential unknown risk related to hazardous ground gases, as well as the leachate assessment and the DSI identifying that landfill leachate is potentially affecting groundwater, a NSW EPA accredited site auditor is recommended to be engaged throughout the duration of works for this project to ensure that any work required in relation to contamination is appropriately managed. A requirement for a site audit statement is likely to be recommended by the EPA as a condition of consent (should recommended conditions of consent be provided at a later date).

If you wish to discuss this letter, please contact Kyle Browne, Operations Officer on 9995 6107 or via email at kyle.browne@epa.nsw.gov.au.

Yours sincerely


2 Oct 2020
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