ENVIRONMENTAL SOLUTIONS

MACARTHUR RESOURCE RECOVERY PARK

APPLICATION UNDER S.75W OF THE *ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979* TO MODIFY THE MINISTERS CONSENT NO. 05/0098 DATED 7 SEPTEMBER 2006

ENVIRONMENTAL ASSESSMENT

31 May 2010

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APPENDICIES

1.0 INTRODUCTION

WSN Environmental Solutions (**WSN**) operates the Macarthur Resource Recovery Park (**MRRP**) (formerly Jacks Gully Waste and Recycling Centre) at Richardson Road, Narellan. The MRRP currently supports a Materials Recycling Facility, a waste landfill, a landfill gas to power generator platform and an Alternative Waste Technology (**AWT**) facility, which itself incorporates an 'ArrowBio' AWT plant, a Garden Organics Plant (GOP) and a series of gas to power generators.

The **AWT** complex operates under the Minister's consent No. 05/0098 (7 September 2006), granted under Part 3A of the *Environmental Planning and Assessment Act 1979* (**the Act**).

Conditions 2.8 and 2.9 of the Consent both effectively limit tonnages received in the GOP to 25,000 tonnes per annum (**tpa**) of garden waste and 5,000 tpa of biosolids. In the 08/09 financial year, the GOP received approximately 28,000 tonnes of garden waste and 0 tonnes of biosolids in order to meet a growing local demand for garden organics processing. To address continually increasing demands, this application now seeks to modify the existing consent under Section 75W of the Act in order to:

- increase the maximum total amount of organics received and processed at the GOP from 25,000 tonnes of garden waste and 5,000 tonnes of biosolids as currently approved to 40,000 tonnes per annum of garden organics and/or biosolids; and
- delete the distinction between garden organics and biosolids.

Within the same application, WSN also seeks retrospective approval to connect the existing landfill gas collection system to the AWT gas holder in order to permit the transfer and utilisation of excess landfill gas to generate additional renewable energy.

Section 75W of the Act sets out the parameters within which the Minister's approval of a Major Project Application may be modified. It provides that the proponent may request the Minister to modify a project approval where the proponent intends to modify the project so it would be inconsistent with that approval "Modification of approval" means changing the terms of the Minister's approval, including:

(a) revoking or varying a condition of the approval or imposing an additional condition of the approval, and
(b) changing the terms of any determination made by the Minister under Divison 3 in connection with the approval..

Under subclause 3 of Section 75W, The Director-General may notify the proponent of EA requirements with respect to the Proposed Modification. The objectives of this report are to:

- Make an assessment as to whether the proposal is suitable for determination under S.75W of the Act;
- Assess the environmental impacts of the proposed modification to the satisfaction of the Director General of the Department of Planning; and
- Assure compliance of the proposal with all relevant statutory requirements.

2.0 SITE PARTICULARS

The subject site is located on Lot 35 DP 1098588, Lot 21 DP 1125616, Lot 2 DP 1076817 and Lot 33 DP 1096463 at Richardson Road, Narellan and is known as the Macarthur Resource Recovery Park (MRRP). The site is located within the Camden Local Government Area (**LGA**) and is bounded by Narellan Vale to the North, Mount Annan to the East and South and Spring Farm to the West. The main entrance to the site is off Richardson Road, via a private access road located at the southern end of Richardson Road. Figure 1 indicates the site in its geographical context.

The MRRP currently comprises a weighbridge, materials recycling facility (**MRF**), landfill gas power generation plant (operated by EDL Operations Pty Ltd) (**EDL**), a small vehicle drop-off facility, remediated former mixed waste and AWT residual landfill and the AWT facility including the ArrowBio Plant, AWT Biological Pant and Garden Organics Plant (GOP). Figure 2 shows the layout of the site.

Figure 1: MRRP Site location

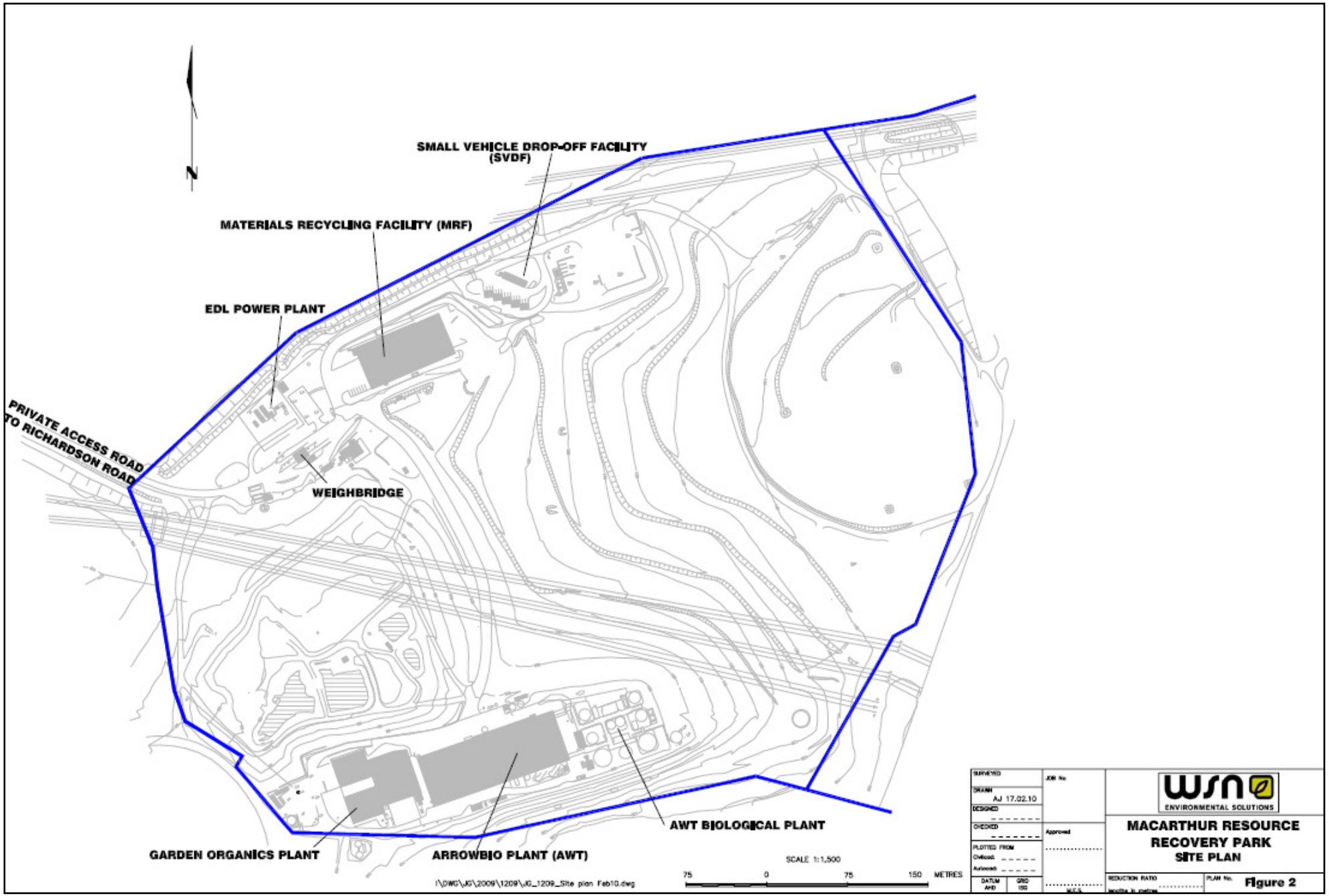

Figure 2: MRRP Site layout

3.0 CONSENT HISTORY

The former Jacks Gully Waste and Recycling Centre was operated as a local garbage tip by Camden Council until 1975 when WSN took control. Council subsequently granted consent to WSN (89/95; 27 July 1995) for a Materials Recycling Centre (MRF), a Gas Power Station (6128/98; 19 April 1999) and a composting facility (67/97; 11 October 1999). WSN approved a Part 5 modification of the inflow of waste tonnages (WSN-JH-04; 8 November 2004).

In 2006, the Minister for Planning granted consent to the AWT facility and the following consent and modifications are of particular relevance to this application:

- Original Consent – Ministers approval under Part 3A of the Act, 05/0098 (7 September 2006) for the Jacks Gully Alternative Waste Treatment Facility.

- Modification for new titles (06_0098; 27 November 2006).

- Modification for new titles (05_0098; 3 April 2009).

The original consent included the construction of an anaerobic digestion type plant (ArrowBio Plant) to process up to 90,000 tonnes per annum of municipal solid waste plus a tunnel composting plant (Garden Organics Plant) to process up to 30,000 tonnes per annum of separated garden organics and biosolids.

The ArrowBio Plant building receives and processes solid municipal waste, through:
- Material separation and removal of recyclables from the domestic waste stream;
- Extraction of the organic component of the domestic waste;
- Biological treatment of the organic component to produce biogas; and
- Production of stabilised sludge/soil conditioner with market potential.

As part of the ArrowBio Plant, two generators capable of producing 2MW of electricity from biogas produced at the facility were approved and installed within the tank storage area.

The GOP converts separately collected garden organics to high grade compost, in twelve fully enclosed composting tunnels. End compost products are then transported off site.

Subsequent modifications related to lodgement of new land titles reflective of boundary adjustments to the site.

The proposed increase to GOP tonnage inflow limits and connection of landfill gas to the AWT Gas Holder require modification of the original AWT consent (05/0098; 7 September 2006). As this consent was granted under Part 3A, it is appropriate to seek modification under Section 75W of the Act.

4.0 PROPOSED MODIFICATION

4.1 Garden Organics Plant

The GOP is a fully enclosed, environmentally controlled system that utilises tunnel composting technology to process organic material into high grade compost and mulch products. The tunnel composting system uses natural decomposition processes in an enclosed, controlled environment.

The original consent for the AWT facility restricted the amount of waste received and processed as follows:

Condition 2.8

Except as provided by a condition of an EPL, the Proponent shall restrict the waste received at the site to the following:

a) 130,000 tonnes per year of mixed municipal waste classified as inert or solid waste under Schedule 1 of the Protection of the Environment Operations Act 1997;
b) 25,000 tonnes per year of garden waste; and
c) 5,000 tonnes per year of biosolids.

Condition 2.9

Except as provided by a condition of an EPL, the Proponent shall ensure that the only wastes that are processed at the site are:

a) 90,000 tonnes per year of mixed municipal waste classified as inert or solid waste under Schedule 1 of the Protection of the Environment Operations Act 1997 at the ArrowBio Plant;
b) 25,000 tonnes per year of garden waste at the Garden Organics Plant; and
c) 5,000 tonnes per year of biosolids at the Garden Organics Plant.

Under the above conditions, a total of 30,000 tonnes of organics (i.e. 25,000 tonnes of green waste and 5,000 tonnes of biosolids) may be received and processed at the facility annually.

Currently the facility processes only straight greenwaste from council collections. However, it has the potential to process a wider range of organics including foodwaste, biosolids and residual digestate from the ArrowBio Plant.

A summary of the approved, operating and proposed tonnages is in the table below:

	Approved tonnes	**Currently Receiving/Processing**	**Proposed tonnes**
Inputs			
Garden waste	25,000	Approx 28,000	40,000 (total organics incl garden wastes, biosolids and other organics)
Biosolids	5,000	0	
Total	**30,000**	**28,000**	**40,000**

The proposal seeks to modify both Condition 2.8 and 2.9 to allow:

- a total of 40,000 tonnes per year of organic materials to be received and processed at the site;
- the deletion of the distinction between garden waste and biosolids and to classify these two material groups commonly under the term ‘organics’.

4.2 AWT/Landfill Gas Connection

The AWT Biological Plant produces methane as part of the biological waste treatment process, which is collected and fed to a gas holder. The gas is then fed to two 1.4 MW AWT gas engines to generate renewable energy for export to the grid. At present, insufficient gas is being produced at the AWT facility to operate both the gas engines.

Gas from the former landfilled areas of MRRP is currently piped to the EDL Power Plant where two (1 MW) engines generate renewable energy and surplus gas is flared off. This flaring off transforms methane into carbon dioxide and significantly reduces the highly negative climate changing potential of methane. It would, however, be preferable if this surplus gas were diverted to renewable energy.

Further, under Condition 2.1 of the Minister's Consent (05_0098 – 07.09.2006), WSN is obliged to

"……. not cause or permit the emission of offensive odours from the site, as defined under Section 129 of the Protection of the Environment Operations Act, 1997."

Effective management of (former) landfill gas emissions is integral to MRRP odour management. WSN's initiative to maximise landfill gas collection and utilisation for renewable energy generation via this new pipeline is an important part of its strategy to address odour impacts from the MRRP in accordance with its obligations under this condition.

In order to take best advantage of the gas resource and minimise flaring operations, it is proposed to transfer surplus landfill gas that cannot be processed in the EDL plant for processing to energy by the AWT gas engines. To achieve this, a new pipeline from the landfill to the AWT gas holder has been installed. The pipeline is yet to be commissioned.

The proposal consists of approximately 670 metres of pipeline partially installed underground, connecting the existing landfill gas collection system to the boundary of the AWT facility. The gas connection from the AWT boundary to the existing AWT gas holder will consist of an above ground stainless steel pipeline with associated control panels. The layout of the proposed pipeline is shown in Figure 3, the trench detail for the in ground section through the former landfill is shown in Figure 4 and an above ground section profile is illustrated in Figure 5.

The pipeline will transport the excess landfill gas, purchased from EDL, the operators of the Power Plant. This landfill gas will then be imported into the AWT and will be mixed with AWT process gas in the existing gas holder under normal operation.

4.3 Planning Consent

WSN seeks consent to retrospectively approve the construction of pipe works connecting the former landfill with the AWT gas holder in order to transfer excess landfill gas to generate additional renewable energy at the AWT. This can be consented via a 75 (W) Modification to the Part 3A Consent for the AWT.

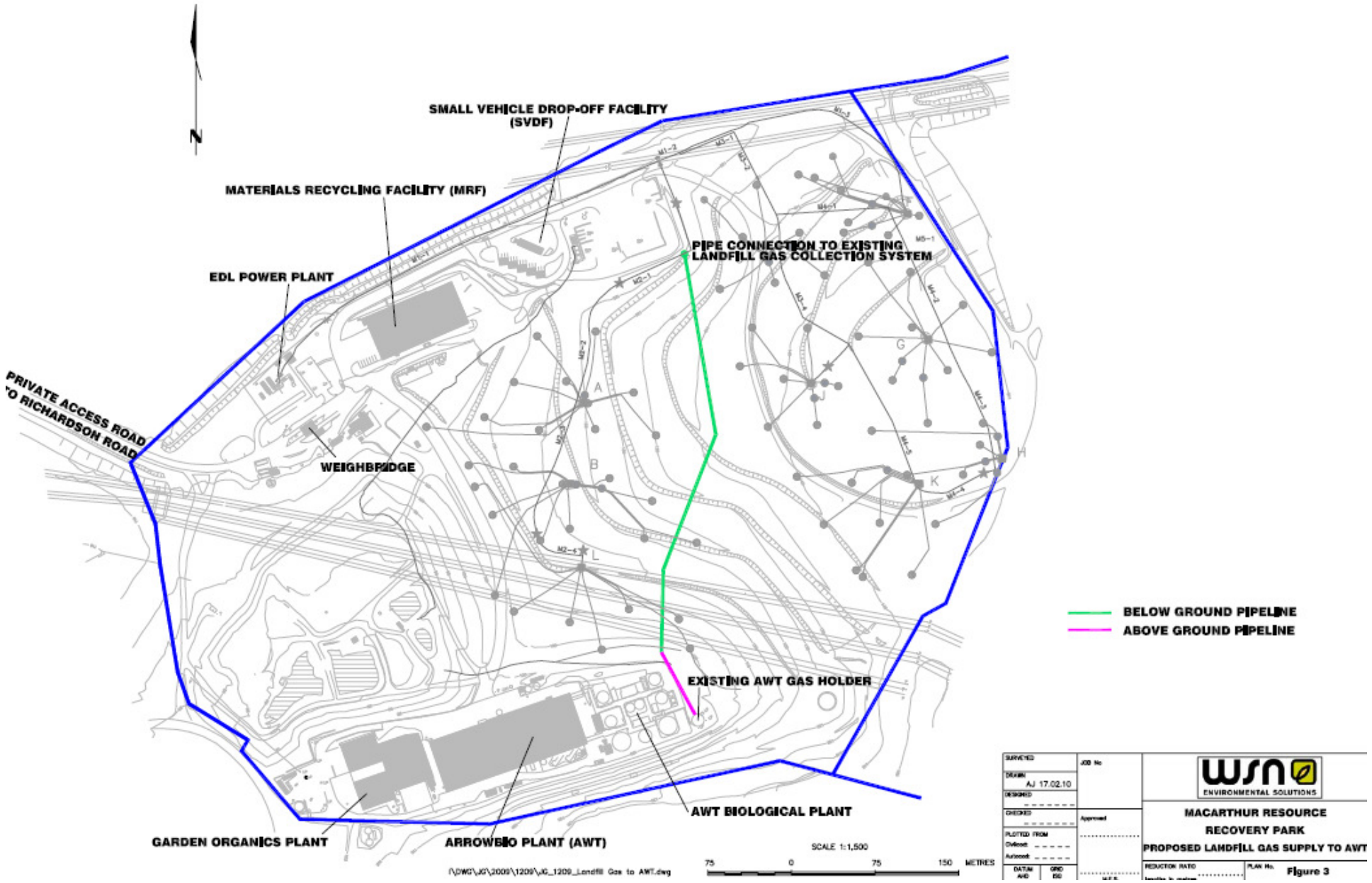

Figure 3: Layout of gas collection pipeline

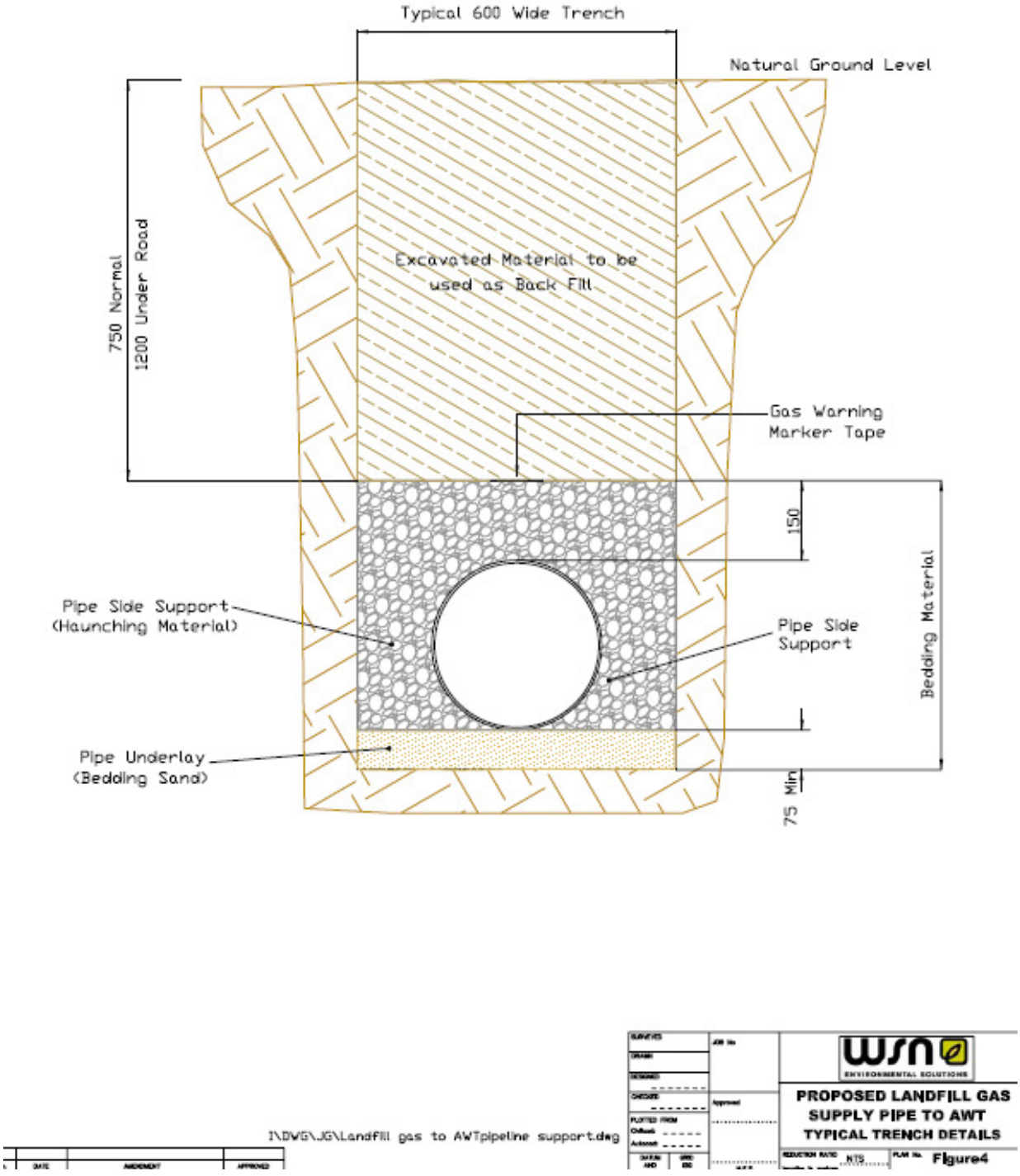

Figure 4: In-ground section of gas collection pipeline through former landfill

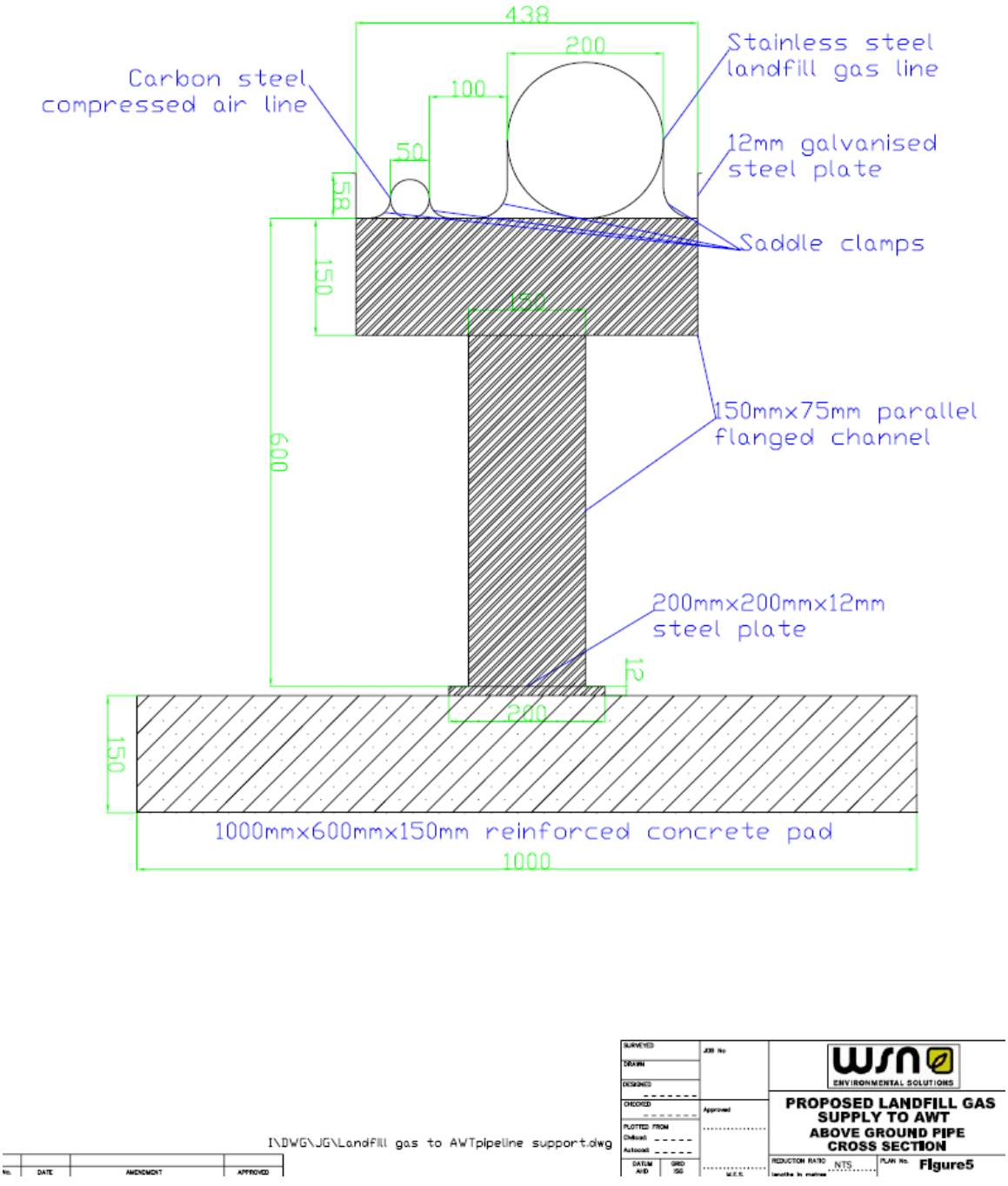

Figure 5: Above ground section of gas collection pipeline (within AWT)

5.0 JUSTIFICATION FOR THE PROPOSAL

5.1 Garden Organics Plant

5.1.1. Increase to Tonnages

The GOP has been in operation since July 2008. Current sources of greenwaste through the facility include local council, contractors, diversion from transfer stations and occasionally material from the small vehicle drop off facility.

Contracts for the receival of garden organics are currently in place with four local councils. The demand generated by these alone is approximately 25,000 tonnes, at the limit placed on garden organics by the current consent. As noted previously, the GOP currently receives approximately 28,000 tonnes of garden waste per annum. Aside from the guaranteed demand from current contracts, WSN is of the opinion that substantial additional demand for use of the facility will result from strong regional population growth, improved local government green waste community education and increased green waste collection services.

The existing GOP has surplus capacity to process substantial additional quantities of garden organics materials with minimal additional impacts on the local environment. The additional tonnage allowance applied for in this application will allow the facility to better fulfil its functions and address the growing demand for the processing of organic waste materials in the Sydney Metropolitan Area.

Moreover, the maximum annual tonnage of 30,000 tonnes of organics as originally proposed (and approved) for the facility was a nominal figure, adopted until thorough trials of the facility could be undertaken.

Through such trials and the day to day operation of the facility, it has been determined that processing of organics through the tunnels can be undertaken within shorter timeframes than originally anticipated to produce 'fit for market' materials.

As such the facility is able to accept and process additional tonnes with minimal impact to current operational and management procedures because accepted organics materials will be processed at a quicker rate through the tunnels than was anticipated in the original EIS.

Overall, the operation and management of the GOP will remain the same as outlined in the original EIS and the GOP will be better placed to address the growing regional demand for garden organics processing with no significant impacts on the local or regional environment.

5.1.2. Deletion of garden waste/biosolids distinction

The current consent limits the GOP to processing only garden waste and biosolids, which restricts the total capability of the facility to meet market demand. This limitation was incorporated in the original consent reflecting WSN's anticipation of the capability of the proposed GOP and market demand.

In practice, the facility has the potential to process:

- clean garden organics,
- combined food and garden organics from council collection systems,
- industrial food wastes,
- biosolids from Sydney Water and other organic waste products, and
- residual/organic material from the Equilibrium Mixed Waste Facility.

The application seeks to remove the distinction between garden wastes and biosolids (in Conditions 2.8 and 2.9 of Consent No. 05/0098), allowing for receival and processing, under the heading 'organics', of a broader range of materials. Subject to availability of feedstock and market demand, consent to receive this wider range of feedstock will allow:

- greater flexibility in accepting and processing organics;
- potential to produce a higher quality end product;

Additionally, in conjunction with the proposed increase in permissible tonnages, increased flexibility in the range of receivables will facilitate trialling of various additional feedstocks in consultation with the Department of Environment, Climate Change and Water (DECCW), leading to a greater variety and quality of end products and potentially more sustainable outcomes in terms of resource recovery.

The limit of different organics received is anticipated to be regulated by the Environmental Protection Licence held for the facility.

In summary, the proposed increase in maximum annual tonnages to 40,000 tonnes is a result of the realisation of the demonstrated processing capability of the tunnel composting system. The increase will allow for more efficient processing of materials and, in conjunction with the proposed broadened range of organic feedstocks, will allow the facility to produce a variety of quality end products without limiting the capability of the system. The additional organics received will be processed and reused in a sustainable manner, significantly increasing resource recovery and resulting in increased landfill diversion with minimal environmental impacts.

Approval of this modification will help to advance core NSW government waste and resource recovery strategies.

5.2 Landfill gas transfer to AWT

The use of landfill gas in the AWT is required to supplement the current inadequate supply of AWT biogas and to fully utilise the operational capabilities of the AWT gas engines. These two gas engines are currently underutilised, whilst excess gas is flared at the EDL Power Plant. Additionally, transfer of excess landfill gas to the AWT will result in more effective (former) landfill odour management.

Currently the biogas feeding the AWT engines is produced by anaerobic reactors in the AWT Biological Plant. The biogas travels from the reactors to the gas holder and is then transferred to the engines.

The short fall in the biogas being produced by the AWT reactors is mainly related to the original over-specification of the two (1.4 MW) gas engines – resulting in their consequent under-utilisation. The excess landfill gas currently being flared off at the EDL Plant presents an opportunity to operate the AWT engines at optimal efficiency levels, providing significant environmental, commercial and operational benefits for WSN and EDL.

As outlined in the environmental assessment that follows in this statement, there are minimal environmental impacts in the proposal to transfer and utilise excess landfill gas to generate additional power at the AWT facility and these are more than balanced by the environmental benefits.

WSN will design, commission and operate the project taking into account standard Hazard and Operability (HAZOP) requirements.

6.0 ENVIRONMENTAL IMPACTS

6.1. General

The Environmental Assessment for the AWT and Garden Organics Plant (WSN / GHD, March 2006) assessed the impact of the proposal under the following headings:

- Water and groundwater
- Traffic
- Dust
- Odour
- Noise
- Flora / fauna
- Visual quality
- Heritage
- Bushfires
- Landfill gas
- Social / economic
- Waste minimisation and demand on resources
- Greenhouse gas emissions
- Cumulative effects.

For the sake of consistency, the potential impacts of this Modification have been assessed against each of these previously assessed elements.

6.2. Water and groundwater

The EA concluded that the AWT and GOP would have no negative impacts on water and groundwater. The process remains unchanged as a result of the proposed modification and impacts on water and groundwater would also not change.

6.3 Traffic

Potential impacts on traffic would result from:

- The receival of increased tonnages into the GOP; and
- Construction of the gas pipeline

A traffic assessment was undertaken by Transport and Traffic Planning Associates to assess the potential impact of increasing tonnages at the garden organics facility. The report of the assessment is attached as **Appendix A**.

Based on current traffic volumes the Traffic Assessment found that the proposal will generate, on average, an additional 2 vehicle trips per hour during the morning peak and 1 vehicle trip per hour during the afternoon peak.

There are currently significant heavy vehicle, truck and commercial vehicle movements in the existing traffic flows along Macarthur Road and Richardson Road and the likely increase in the volume of such vehicles as a result of the proposal is considered to be relatively minor. It is also noted that the access road system has the capacity to accommodate these small additional movements without any adverse traffic capacity or safety implications.

Overall the traffic assessment undertaken concluded that:

- the resultant increase in delivery and dispatch movements will be relatively minor in terms of vehicle trips per hour
- there will not be any unsatisfactory capacity or safety implications

- there are significant heavy vehicle movements along Macarthur Road and Richardson Road at present and the potential increase in these movements as a result of the proposal will be minor and largely imperceptible.

In addition, there are no changes to the existing vehicle access and circulation arrangement on site. As the proposal will not involve any additional staff working on the site and the small increase in vehicle movements (i.e. less than 1 delivery vehicle per hour) does not raise the need for any additional parking or unloading capacity.

Traffic impacts related to the construction of the proposed gas pipeline are not relevant as the construction phase is complete at the time of preparation of this Statement. There will be no changes to traffic movements or additional vehicles as a result of the proposal to transfer landfill gas to the AWT facility.

6.4 Dust

The GOP will remain as a contained operation with all unloading, loading and processing occurring within purpose built enclosed structures. Dust emissions will not change as a result of the proposal and impacts will remain acceptable.

6.5 Odour

An odour assessment was undertaken by PAEHolmes (formerly Holmes Air Sciences) to assess the potential impact of increased tonnages at the GOP and the transferring of landfill gas to be utilised at the AWT facility. A statement from PAEHolmes is contained in Appendix B.

The GOP was the subject of air quality modelling studies undertaken to support the original application. These studies assumed that the biofilter system used to filter odours from the GOP would operate continuously with the GOP and in effect limit the odour concentrations.

The statement prepared by PAEHolmes notes:

"At present the GOP has surplus capacity and the proposal to increase the throughput would increase the time that the composting tunnels were being used, rather than increasing the intensity of the odour emissions. Therefore, provided that the biofilter is maintained, the impacts should be no greater than those predicted in the impact assessment. Continuous use of the biofilter can also assist in its performance."

It is also noted that use of additional organics would not result in any adverse odour impacts and ongoing monitoring is recommended to monitor the performance of the biofilter.

In relation to the landfill gas connection, *"The use of the landfill gas to supplement the biogas used by the AWT power units (which are currently underutilised) would not increase the intensity of the emissions, but would increase the time over which emissions occurred."*

This was taken into account in the previous assessment undertaken by Holmes Air Sciences in 2006, for the AWT biogas facility at the time of the original development application.

Overall, PAEHolmes finds that the proposed modifications will not result in increased odour impacts in the locality.

As previously highlighted, the transfer of excess landfill gas to the AWT will result in more effective (former) landfill odour management.

6.6. Noise

The only potential source of additional noise resulting from the proposed GOP tonnage modification would be from the additional vehicles to the site. Given the findings of the traffic assessment that there will be an insignificant increase in vehicular movements (amounting to less than one vehicle per hour), it can be concluded that noise impacts as a result of the proposed modification will also be negligible.

There will be no significant additional construction or operational noise as a result of the proposal to transfer landfill gas to the AWT facility.

6.7 Flora / fauna

Neither the proposed tonnage increase or the pipeline will have any effect on flora or fauna.

6.8 Visual quality

The proposals include no new structures and will have a nil effect on visual quality.

6.9 Heritage

Indigenous and non-indigenous heritage values will not be affected by the two proposals.

6.10 Bushfires

The existing development complies with the principles of *Planning for Bushfire Protection* (Planning NSW 2001). The proposed modifications will not change the status of the development in this regard.

6.11 Landfill gas

The MRRP employs best industry practice to manage landfill gas and avoid migration. The proposed new pipeline will further improve gas collection and utilisation from the former landfill site and so contribute positively to landfill gas management on the site.

6.12 Social / economic

The MRRP currently produces significant social and economic benefits in the locality and region through employment, provision of a sustainable and convenient waste management facility and diversion of regionally generated waste from landfill. The proposed modifications would further these regional benefits through amplification of waste management services and potential increase in generation of renewable energy from landfill gas.

6.13 Waste minimisation and demand on resources

By definition, the GOP and AWT facility minimise waste and demand on resources through a process of resource recovery and utilisation. The further efficiencies that would result from the two proposals in this application would enhance waste minimisation and divert demand on traditional energy resources such as fossil fuels.

6.14 Greenhouse gas emissions

The proposed modifications would contribute positively to the already substantial beneficial effects of the existing GOP and AWT facility on greenhouse gas emissions.

6.15 Cumulative effects.

Operation of the current facilities creates positive cumulative impacts at social, economic and environmental levels. The proposed amendments will have no negative impacts and will contribute substantially to these existing positive impacts.

6.16 Construction Impacts

The in-ground section of the proposed AWT gas pipe line has been constructed through the former landfill and will connect to the production biogas line of the existing landfill gas collection network, in accordance with Construction and Manufacturing Standard AS 4041-2006. The gas pipeline and connection has been constructed using appropriate fabrication criteria and suitably trained welders who are qualified for this procedure and supervised as per the guidelines contained within Pressure Equipment - Welding & Brazing Qualification Standard AS/NZS 3992-1998.

As a safety precaution, an isolation valve has been installed on the existing biogas line and another isolation valve has been installed on the AWT landfill gas line. After completion of pipeworks, a welding inspection was performed by a qualified welding inspector and an inspection certificate was issued.

JSEA's have been completed by the Project Manager and AWT Process Manager and reviewed and signed off by the site OH&S Officer prior to work commencement - along with Safe Work Method Statements that were completed by contractors prior to any work being commenced.

7.0 STATUTORY CONSIDERATIONS

An assessment of the facility against the provisions of relevant Environmental Planning Instruments and policies follows:

- Section 75W of the Act - Modification of Minister's Approval

The approval for the Jacks Gully AWT, Ministers consent no 05/0098, was granted in accordance with Part 3A of the Act. Section 75W(2) of the Act provides that a proponent may request the Minister to modify his approval of a project. The Minister's approval is not required if a change to the project is proposed that would be consistent with the original approval.

The proposed increase to received and processed tonnages at the GOP, the deletion of the distinction between biosolids and garden organics and the landfill gas connection to the AWT gas holder, seek to alter the terms of the Ministers determination through varying the conditions of the above consent. Accordingly the proposed modifications are inconsistent with the current terms of the Ministers approval and as such require an application under section 75W.

The Act includes no specific test to verify whether a proposal can be determined as a modification of an existing consent under S.75W. However, the generally accepted test under Case Law is whether or not a proposal would constitute a 'radical transformation' of the development as consented (Barrick Australia Ltd v Williams [2009] NSW CA 275). The proposed modification, involving additional tonnage within the capacity of the existing GOP infrastructure and a single gas pipeline, all with illustrated minimal environmental impact, is considered to fall well short of a 'radical transformation' of the existing consented development. It is thus considered that the Minister is able to determine the application as a Modification under S.75W(4) of the Act.

- State Environmental Planning Policy No. 33 – Potentially Hazardous or Offensive Developments;

The operation of the AWT facility is considered potentially offensive as the composting related activities could potentially impact on the surrounding locality.

However the AWT facility is not considered hazardous as environmental management controls incorporated within the facility limit the potential health risk to workers and surrounding residents and risk to the biophysical environment.

The proposed modifications do not alter the environmental management of the AWT facility and as such there would be no creation of a potentially hazardous operation.

- State Regional Environmental Plan No. 20 – Hawkesbury-Nepean River (No.2 – 1997)

This policy applies to the Camden Local Government Area and aims to protect the environment of the Hawkesbury-Nepean River system by ensuring that the impacts of future land uses are considered in the regional context.

The proposed modifications do not create any additional matters for consideration under this policy.

- Camden Local Environmental Plan No.48

The Camden Local Environmental Plan No. 48 (LEP 48) is the principal environmental planning instrument that applies to the site and surrounding locality. The site is zoned 5(a) Special Uses - Waste Management Centre, under this Plan. The proposed modifications are consistent with the aims of the Plan and would not result in any non-compliance with its development controls.

- Draft Camden Local Environmental Plan 2009

The Draft Camden Local Environmental Plan 2009 (draft LEP 2009) was adopted by Camden Council as a draft instrument on 24 November 2009 and outlines the proposed planning controls for the Camden Local Government Area. The site is zoned SP2 Infrastructure (Waste or Resource Management Facility) under this Plan. The proposed modifications are consistent with the proposed objectives for this zone and, again, would not result in non-compliances with its controls.

8.0 CONCLUSION

8.1 Garden Organics Plant

The proposed modifications are required to maximise the capability of the approved Garden Organics Plant. The increase in accepted and processed annual tonnages stems from the realisation of the processing capabilities of the facility (i.e. compost tunnels). The increase will allow for more efficient processing of materials and in conjunction with allowing other organic feedstocks, will enable the facility to produce a variety of quality end products without limiting the capability of the system.

In particular the proposal seeks to modify Condition 2.8 and 2.9 of Consent No. 05/0098 dated 7 September 2006 in the following manner:

Condition 2.8

Except as provided by a condition of an EPL, the Proponent shall restrict the amount of waste received at the site to the following:

a) 130,000 tonnes per year of mixed municipal waste classified as inert or solid waste under schedule 1 of the Protection of the Environment Operations Act 1997; ***and***

*b) ~~25,000~~ **40,000** tonnes per year of ~~garden waste; and~~ **organics**.*

~~c) 5,000 tonnes per year of biosolids.~~

Condition 2.9

Except as provided by a condition of an EPL, the Proponent shall restrict the amount of waste that is processed at the site as follows:

a) *90,000 tonnes per year of mixed municipal waste classified inert or solid waste under Schedule 1 of the Protection of the Environment Operations Act 1997 at the ArrowBio Plant;*
b) ~~*25,000*~~ ***40,000*** *tonnes per year of* ~~*garden waste*~~ ***organics*** *at the Garden Organics Plant****.*** ~~*; and*~~
c) ~~*5,000 tonnes per year of biosolids at the Garden Organics Plant.*~~

8.2 AWT Landfill Gas Connection

The gas pipeline connection of the landfill gas collection system to the AWT gas holder is required to redirect excess landfill gas from the EDL Power Plant to provide additional biogas to fuel the AWT engines in order to generate renewable energy. The pipeline will facilitate increased renewable energy production and reduced fossil fuel related greenhouse gas emissions. It will also assist in more effective (former) landfill odour management by maximising the collection of landfill gas.

This Statement demonstrates that the proposed modification is consistent with the terms of the original approval and is suitable for determination by the Minister under S.75W of the Act in that it does not constitute a 'radical transformation' of the originally approved development. The Statement also illustrates that that there will be no substantive negative environmental impacts as a result of the proposed modifications and that real benefits will result for the local and regional community and the environment. In this regard it is considered that the Modification application warrants the Minister's consent.

APPENDIX A: TRAFFIC IMPACT ASSESSMENT

APPENDIX B: OPINION ON ODOUR IMPACTS