



Our reference: SF/16/21988, DOC17/318993

Manager Industry Assessment
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Nikki Matthews

Dear Sir/Madam

**ToxFree Australia Pty Ltd - 40 Christie Street St Marys
Modification of an Existing Activity MOD06_0095 MOD4.**

I refer to your correspondence dated 24 May 2017 and the attached documents, which included "Proposal for the acceptance and treatment of E-waste & Minor Site Works ToxFree Australia Pty Ltd, Environmental Assessment: MP06_0095MOD 4, May 2017"; a site plan; "Noise Assessment – Toxfree Treatment Facility Upgrade, St Marys prepared by Wild Environment dated 4 April 2017"; "Mass Balance Flat Plan Displays"; and "Manufacturer specification of Blue Box".

The EPA has reviewed this information and provides the following comments in relation to the proposed modification of the existing activity at 40 Christie Street St Marys NSW.

Toxfree Australia Pty Ltd, 40 Christie Street, St Marys is a site of scheduled activity under the *Protection of Environment Operations Act 1997*. The site holds environment protection licence No. 12628, issued by the EPA. The activities carried out at the premises include storage of hazardous waste comprising dangerous goods, processing of fluorescent tubes and lamps, non-thermal treatment of certain hazardous waste, container crushing (mainly paint containers and aerosol cans) and consolidation, decanting and repackaging of various waste substances.

The proposed modification is an improvement of the existing activity relating to the fluorescent lamp recycling unit. The proposed modification, the BluBox treatment system, is a fully enclosed system that operates under negative pressure at all times, including during standby mode. The BluBox unit sits within an enclosed building. The system also contains a carbon filter which is designed to capture any mercury vapour released during the processing of the waste. The air treatment system incorporates mercury monitoring which notifies the employees should ambient air contaminants exceed health regulations. The air treatment system also continues to operate during emergency shutdowns of the BluBox treatment system.

The EPA agrees with the proponent's conclusion that the operation of the BluBox treatment system would not impact on air quality. The EPA also considers that there would not be any adverse impact on water quality from the proposed modification.

In relation to the noise assessment the EPA considers the proposed modification is a low risk proposal with respect to noise.

The EPA note that the noise assessment shows a total of four roller doors on the treatment building. Modelling has been carried out assuming these doors are open. To provide additional noise mitigation to nearby residences, the EPA recommend that these doors, and particularly the eastern side door facing residences, be kept closed or fitted with fast opening/closing shutters to be operated from 5am to 7am and 10pm to 11pm where practicable, subject to safety and operational considerations.

The EPA considers the noise assessment report and its conclusion acceptable.

I trust that you will find this information helpful in considering the application. Should you require further information regarding this matter, please contact Jeevan Jacob on 02 9995 5902.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Mark Carey', is positioned above the printed name.

Mark Carey
A/Head Hazardous Materials

13 June 2017