



17th November 2021

Rob Hogan
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By email to: rob.hogan@epa.nsw.gov.au

To Mr Hogan

***Re: Agency Consultation – Development Modification for a Permanent Landfill Gas Flare –
Dial-A-Dump Industries (EC) Pty Ltd – Eastern Creek Recycling Ecology Park***

The purpose of this letter is to provide information and consult with the Environment Protection Authority (EPA) regarding the proposed Eastern Creek Recycling Ecology Park (REP): Landfill Gas Capture project. This letter invites the EPA to provide feedback on the Proposal.

Jackson Environment and Planning Pty Ltd has been engaged by Dial-A-Dump Industries (EC) Pty Ltd (DADEC) (which was acquired by Bingo Industries Ltd in February 2019) to prepare a Development Modification Application to install a permeant Landfill Gas Flare at the Eastern Creek Recycling Ecology Park located at 1 Kangaroo Ave, Eastern Creek NSW (the Site).

To help manage landfill gas and related odour emissions, DAREC have committed to preparing a development application for a permanent flare system under Condition U1.2 (b) of Environment Protection Licence 13426 (Licence). DAREC have committed to submitting all required documentation to the Department of Planning, Industry and Environment to implement and commission the proposed permanent flaring system by 30 November 2021.

The proposed permanent flare will help improve operational efficiency of the gas flare management system, by removing the temporary flares from the landfill void. A permanent flare will provide DAREC with future potential co-generation capabilities associated with the utilisation of landfill gas on site to reduce reliance on electricity during peak demand periods as well as supply of beneficiated gas to third parties.

The Modification Proposal involves the installation of two (2) 1,500 m³/hr high temperature, fully enclosed ground flares (model OEF-300) at the Site (refer to Figure 1 for the proposed site layout plan). The flares are designed to incinerate biogas with a methane composition

between 10-60%. Ignition is established using an interrupted LPG gas pilot. The flares will be connected to an existing three phase power source.

The flares will be connected to the existing gas collection system via a 450 mm main header line. Biogas enters the flares via a stainless-steel knock-out pot and is drawn into the biogas blower. The stainless-steel condensate knockout pot will be located prior to the entry of the gas booster to ensure that no airborne liquids can pass into the gas booster.

The flare will be automatically and remotely controlled using the Horner flare Programmable Logic Controller (PLC) and will have automatic shutdown and restart with remote dial in telemetry. The flare unit provides industry best practice control over combustion air to facilitate elevated temperatures, whilst ensuring complete combustion.

Condensate will be removed passively at low points using barometric ‘traps’ at low points of the header lines. In-line barometric condensate traps will be installed to remove any condensate build up within the main header line close to flare. The flow lines will be laid so that condensate can fall back to the wells or to a condensate trap. The length of the lines will be minimised to reduce the likelihood of introducing low points, friction loss and build-up of condensate.

As part of the development, the four existing temporary LFG flares will be decommissioned upon establishment of infrastructure subject to approval under the Modification Proposal. DADEC is currently developing contingency arrangements to ensure that the current temporary system continues to function effectively for managing landfill gas emissions until the permanent flare system is established.

Consultation has been performed during the project scoping phase with the Department of Planning, Industry and Environment (DPIE), and they have confirmed that a Section 4.55(1a) planning pathway would be appropriate for the project under the *Environmental Planning and Assessment Act 1979*. This is because the environmental impacts will be minor and positive from an odour and greenhouse gas perspective. Specific environmental matters that are to be addressed in the development application as documented in the Secretary’s Environmental Assessment Requirements issued on 9 November 2021 include:

- Air quality;
- Visual;
- Noise and vibration;
- Hazard and risk;
- Fire and incident management;
- Soil and water;
- Biodiversity;

- Aboriginal and cultural heritage; and
- Consultation with the Environment Protection Authority, and other relevant groups.

A Statement of Environmental Effects (SEE) is currently being prepared to address all assessment requirements as recommended by DPIE. The SEE will discuss any likely impacts and provide an overview of operational and environmental mitigation measures. To support the preparation of the SEE specialist consultants have been commissioned to carry out assessments on air quality and noise impacts.

Community consultation regarding the Modification Proposal is also being undertaken as part of the broader consultation activities for the Site. To date this has comprised a range of activities including distribution of newsletters, online webinars, website and social media updates, and direct communication with interested stakeholders.

DPIE have recommended that DADEC consults with the EPA prior to lodgement of the development modification to seek feedback on the proposal.

We would appreciate your return response by 26th November 2021.

Please feel free to contact Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email rylan@jacksonenvironment.com.au should you need any further information.

Yours sincerely,



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Figure 1. LFG flare and header line (orange line and blue lines) installation layout.

