

Our reference:

David Mooney (A/Team Leader)
Department of Planning & Infrastructure
Industry Projects
GPO Box 39
SYDNEY NSW 2001
David.Mooney@planning.nsw.gov.au

EMAIL

Dear Mr Mooney,

Re: Modification to SITA Advanced Waste Treatment Facility, Kemps Creek

I refer to the 'Modification Assessment Report' prepared by AECOM for SITA Australia Pty Ltd and Consultation Draft dated January 2014 produced by the Department of Planning & Infrastructure "the Department") for the proposed Modification of Project Approval (06_0185) submitted to the Environment Protection Authority (EPA) on 8 January 2014.

The EPA has reviewed the documents and advises it has no objection to the proposed modification. The EPA notes that the maturation period will significantly decrease as a result of the modifications. The EPA advises that the applicant will need to ensure the final product still meets requirements of Condition 3 and 6 of Project Approval (06_0185). If the modified maturation period results in an increase in odour, the EPA may require additional odour monitoring or mitigation to be undertaken.

The EPA provides the following comments and recommended conditions of approval.

Definitions

The waste definitions used in the Consultation Draft do not reflect current definitions in Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act). The EPA therefore recommends these definitions be updated as follows:

- *Elizabeth Drive Landfill* - The waste management facility off Elizabeth Drive licensed to receive (Solid Waste Class 2 and Industrial Waste) General Solid Waste.
- *Garden Waste* - (Source separated garden or related organic waste) waste that consists of branches, grass, leaves, plants, loppings, tree trunks, tree stumps and similar materials, and includes any mixture of those materials.
- *Industrial Waste* – this is not defined in the POEO Act - Replace with 'Restricted Waste' and 'Special Waste'.
- *Mixed Waste* - Municipal solid waste or commercial and industrial waste that has been classified as (inert or solid) general solid waste under schedule 1 of the POEO Act

Proposed Conditions

Leachate Barrier

18. Outdoor areas where compost products or organic outputs are stored must have a leachate barrier system in the form of clay or modified soil liner (or equivalent) consisting of at least 600mm of recompacted clay with an in-situ permeability (K) of less than 10⁻⁷ m/s.

This condition should be updated to reflect the upgrade to a concrete hardstand. Therefore the EPA recommends that 'or concrete hardstand' be added to the Condition. The EPA also recommends the following conditions.

"The leachate barrier referred to in Condition 18 must be graded to drain to a leachate collection system".

"Water which contacts compost products or organic outputs in the outdoor areas must be managed as leachate".

If you have any questions regarding this matter, please contact Christy Groves on (02) 9995 5765.

Yours sincerely

 23/01/2014

CELESTE FORESTAL
Unit Head - Waste Compliance
Environment Protection Authority