



ENVIRONMENT PROTECTION AUTHORITY

Your reference: CP06_0025 MOD 1
Our reference: DOC12/30743
Contact: Alex Bourne
(02) 9995 55

Mr Chris Ritchie
Manager – Industry
Mining and Industry Projects
GPO Box 39
SYDNEY NSW 2001

EMAIL & STANDARD POST

Dear Mr Ritchie

**Hanson Concrete and Asphalt Facility Eastern Creek (CP 06_0025 MOD 1) Site Layout
Amendments – Submissions and Recommended Conditions**

I refer to the revised Part 75 W modification for Hanson Concrete and Asphalt Facility, located at Lot 5 DP 1145808, Eastern Creek ("the Premises"). The Department of Planning and Infrastructure ("DP&I") requested the EPA make a submission in relation to this modification. The Proponent for the project is Hanson Construction Materials Pty Ltd ("the Proponent").

The Environment Protection Authority ("EPA") has reviewed the modified concept plan dated 12 June 2012 prepared by Hanson Construction Materials Pty Ltd and based on the information set out in the modified concept plan, provides additional recommended Conditions of Approval for your consideration as Attachment A.

The EPA understands the project is at the concept plan stage, however, it recommends that DP&I consider this submission in its assessment requirements and approvals of associated project applications.

The following additional conditions of approval and additional licence conditions are conditions that will need to be included in any Environment Protection Licence for the premises. As such the EPA recommends that the modified concept plan approval and any related project approvals are consistent with these conditions.

The Proponent should be made aware that, consistent with provisions under Part 9.4 of the POEO Act, any environment protection licence issued by the EPA in relation to a waste facility will require the provision of a financial assurance. The amount and form of the assurance would be determined by the EPA and required as a condition of the licence.

If you have any questions in relation to this matter, please contact Alex Bourne on (02) 9995 5595.

Yours sincerely

J Ingham 27/7/12
Jacqueline Ingham
Unit Head Waste Operations
Environment Protection Authority

Encl. Attachment A – Additional Comments and Recommended Conditions of Approval

Attachment A
EPA – Additional Comments and Recommended Conditions of Approval
Hanson Concrete and Asphalt Facility Eastern Creek (CP 06 0025 MOD 1)

MODIFICATION TO THE PROPOSAL

The key changes to the facility with potential environmental impacts comprise:

- Reorientation of the concrete batching plant
- Relocation of the asphalt plant from the north western corner of the site to a central location
- Relocation of the concrete recycling facility from a northern to southern area of the site, a further 300m away from the nearest residential receptors but closer to the nearest industrial receptors.

It is noted that the nearest industrial receptors to the east of the premises have now been identified as sensitive receivers.

COMMENTS AND RECOMMENDED CONDITIONS OF APPROVAL

A. AIR QUALITY AND ODOUR

DUST

Comments

The facility has history of dust complaints from adjacent industrial receptors and is subject to a Pollution Reduction Program to improve dust suppression through installation of a water spray suppression system on all unsealed areas, roads and active stockpiles, a wheel wash and aggregate on the road from the north eastern entrance of the premises to the stockpile area.

In addition, planning consent conditions for the facility required the development of a reactive dust monitoring and management program, with Hanson proposing the use of continuous PM10 monitors with the following notification levels:

- Investigation Level- two consecutive 15 minute average PM10 concentrations in excess of 90 µg/m³
- Action level- single 15 minute average PM10 concentration in excess of 200 µg/m³.

The licence for the facility also contains the following conditions relating to dust:

- O3.1 The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises
- O3.2 Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading
- O3.3 All active stockpiles are to be appropriately wetted down to minimise the generation of dust.

Given that the site is largely unsealed and it has a history of dust complaints, there is scope for further best practice measures to minimise dust from the facility. In view of this, the EPA has drafted the following conditions for consideration. A requirement to audit dust management practices and benchmarking against best practice would oblige the licensee to ensure that dust emissions are minimised as far as is practicable.

Recommended Conditions of Approval

UX. Dust Audit

UX.1 By no later than 6 months from the commencement of the modified operations, the Licensee must submit a dust audit report to the EPA's Manager Waste Operations.

The dust audit report must address the following:

- (a) A summary of any dust complaints received and actions taken to reduce dust emissions where complaints are verified;
- (b) Benchmark the design and management practices at the Hanson Concrete and Asphalt Facility Eastern Creek premises against industry best practice for minimising dust emissions. This should include, but not be limited to, appropriateness of the surface of concrete batching and recycling areas, suppression of emissions from roads and active stockpiles; and
- (c) Using the results of (a) and (b), if it is identified that the facility does not meet industry best practice standards for dust minimisation in any area of the modified operations, the report must include:
 - (i) Proposed mitigation works and/or management practices to ensure that dust is minimised as far as is practicable; and
 - (ii) A timetable for the implementation of these works.

ODOUR

Comments

EPA initially provided advice on the original Concept Plan for the proposal in 2006, requesting an assessment of potential odour impacts from the asphalt plant. EPA notes that an assessment of air quality impacts from the proposed asphalt facility has never been undertaken. Asphalt facilities such as the proposed have the potential to generate emissions of particulates, VOCs, PAHs and odorous pollutants. Given that further development will be occurring to the eastern boundary of the facility it is recommended that Hanson revise their Air Quality Impact Assessment ("AQIA") for the facility in accordance with the requirements of the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* as part of the planning approval process. The revision should include an assessment of potential odour impacts in addition to other criteria pollutants and take into account both the reconfiguration of the site and additional receptors in the area since the initial AQIA was completed.

B. NOISE

As the industrial estate adjacent to the eastern boundary of the premises has now been identified as a sensitive receiver EPA recommends that the Proponent assesses the noise impact against NSW industrial noise policy. Refer to:

<http://www.environment.nsw.gov.au/noise/industrial.htm>

C. ONSITE WATER REUSE

EPA's original comment to the EMS: *The Stormwater Management Scheme (Attachment C) does not address the possibility that areas of the Fulton Hogan Asphalt Plant may be subject to TPH/BTEX and chlorinated hydrocarbon contamination, or controls determining whether or not the surface water collected would be suitable for on site reuse. The Stormwater Management Scheme must consider the appropriateness of reusing the collected stormwater from the Fulton Hogan Asphalt Plant.*

The Proponents assessment prepared by Martens stated that it is assumed that the contamination status is generally acceptable as it is not currently listed on the EPA's public register for contaminated sites and that it is currently the subject of an EPL with environmental controls in place.

EPA considers this response inadequate as EPA has received recent contamination reports for the Fulton Hogan asphalt plant suggesting the potential for TPH/BTEX and chlorinated hydrocarbon

contamination. While the report states that the site is considered suitable for continued industrial use, there is no assessment of the suitability of the onsite water for irrigation.

EPA recommends that prior to the reuse of any onsite water originating from the asphalt plant site, an EPA auditor review the contamination assessments, and if required, develop a sampling and analysis program to determine the suitability of the onsite water for irrigation.