

NEW SOUTH WALES

06 March 2014

The Manager – Industry
Industry, Social Projects and Key Sites
Department of Planning and Infrastructure
23- 33 Bridge Street
Sydney NSW 2000

Dear Chris,

Re: Woodlawn Alternative Waste Technology Facility (MP 06 0239 MOD 1)
Proposed Modification- Response to Submissions

With reference to the Department of Planning and Infrastructure (DPI) (correspondence, dated 18 February 2014), Veolia Environmental Services (Veolia) hereby submits a response to the submissions, pertaining to the Environment Assessment (EA) for the proposed modification to the Woodlawn Alternative Waste Technology Facility (the Development), from the following government agencies:

- Department of Primary Industries – *minor changes to water supply sources and existing infrastructure noted by the NSW Office of Water, no issues raised;*
- Goulburn Mulwaree Council – *odour management and maintenance of road contributions noted, no issues raised;*
- Palerang Council – *noted, no issues raised;*
- Roads and Maritime Services – *noted, no issues raised;*
- Environment Protection Authority (EPA) – *refer detailed response overleaf.*



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- **Waste Management**

Veolia wish to advise the DPI and the EPA that a separate weighbridge with dual incoming and outgoing function will be utilised for the Development, details of which shall be provided prior to construction and incorporated into the *Operational Environmental Management Plan* (OEMP) for the Development. Site plans indicating the location of the weighbridge (refer Attachment 1), as well as modification to the internal access road from the shared Woodlawn Eco Project Site entrance has been provided with this correspondence (refer Attachments 2 and 3).

In response to EPA's request for a *Waste Receipt and Vehicle Flow Control Plan*, Veolia will address this in the *Waste Management Plan* and *Traffic Management Plan* respectively, both of which shall be appended to the OEMP.

Veolia additionally requests that the submission of the OEMP and its supplementary plans for approval be prior to commissioning of the Development, as '*details of the infrastructure, and the systems and procedures, that will be used to ensure compliance with the requirements of Section 88 of the Protection of the Environment Operations Act 1997*' (POEO Act) will not be finalised prior to construction.

- **Odour**

Veolia notes that Condition 22 of the Project Approval 06_0239 requires updating in line with Section 129 of the POEO Act.

As noted in the EA, the TriAusMin operations are located on the same Woodlawn Eco Project Site as the Development. As no specific odour criteria apply in the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (EPA, 2005) for industrial receptors, the TriAusMin Administration building therefore is not considered an offsite or sensitive receptor, pertaining to odour emissions from the Development.

With reference to the odour impact assessment undertaken as part of the EA, the contribution from the Development is predicted to be 1.7 OU at the proposed TriAusMin Administration building. It is considered that capture of fugitive emissions within the processing buildings and use of biofilters to reduce odour emissions shall act to reduce the odour impacts at all surrounding receptors.

While Veolia acknowledge that the modelling of cumulative odour impacts is best practice, it is understood that in accordance with Section 129 of the POEO Act, the Development will be governed by a separate Environment Protection Licence to the Woodlawn Bioreactor, which is was modelled to be the significant contributor at the TriAusMin Administration building.



- **Outputs**

The mechanical biological treatment (MBT) methodology adopted at the Development has been designed to especially meet the requirements of the EPA issued current General and Site Specific Resource Recovery Exemptions (Resource Recovery Exemptions) to enable the application of outputs to land.

The Site Specific Resource Recovery Exemption was obtained to ensure that the '*compost output products*' from the Development would be suitable for use at the Woodlawn Eco Project Site for rehabilitation of the remnant mine site.

Veolia have invested significant time, cost and resources in applying for the Site Specific Resource Recovery Exemption and the development of the MBT technology that would meet both regulatory and customer requirements, as well as being suited to rehabilitating the significant mine disturbed areas on site.

While Veolia recognise that the General Resource Recovery Exemptions may be subject to change, there should be no basis to change the Site Specific Exemption once granted. Feasibility of the Development is reliant on the regulatory certainty that is provided by the Site Specific Resource Recovery Exemption, which is finite for the life of the Development. Any future modification to the Site Specific Resource Recovery Exemption may impact the mass balance for the Development, which will impact on both its commercial viability and Veolia's contractual obligations to our Council customers. We shall be addressing this issue specifically with the EPA.

It is also noted that Condition 4 of the Schedule 3 of the existing PA needs to be updated in line with the waste classification from 'industrial waste' to 'restricted waste' under the POEO Act.

Should you require further information regarding this response, please contact the undersigned on 9841 2928 or ramona.bachu@veolia.com.au.

Yours Sincerely,

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Veolia Environmental Services
Ramona Bachu
Project Manager – Resource Recovery

Enclosed:

- Attachment 1: Woodlawn MBT Facility Project Wide Site Layout Plan
[Drawing No. H345190-0000-00-014-0001 REV F]
- Attachment 2: Woodlawn MBT Facility Project Wide Site Layout – Photo Overlay Plan
[Drawing No. H345190-0000-00-014-0007 REV E]
- Attachment 3: Woodlawn MBT Facility Project Wide Site Layout – Photo Overlay
[Drawing No. H345190-0000-00-014-0001 REV G]