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Industry Assessments
Department Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2000

By email: Katelyn.Symington@planning.nsw.gov.au

Electronic mail
25 November 2019

Dear Ms Symington

Visy Dry Recyclables Facility - SSD10364
Air Quality Impact Assessment further information required

The NSW Environment Protection Authority (EPA) refers to Appendix I - Air Quality Impact Assessment (AQIA) of *Environmental Impact Statement for Visy Dry Recyclables Facility 112-120 Euston Road Alexandria* prepared November 2019.

The EPA's Technical Advice Air Unit has reviewed this assessment and provides the following comments and recommendations for further information to be submitted.

1. $PM_{2.5}$ exceedance

Annual average and 100th percentile 24-hour $PM_{2.5}$ concentrations were predicted to be exceeded at the child care facility and the parkland.

The predicted annual incremental (project only) $PM_{2.5}$ concentrations are 0.7 µg/m^3 and 0.4 µg/m^3 at the child care facility and the parkland, respectively, both less than 10 % of the criteria. The 100th percentile 24-hour $PM_{2.5}$ concentrations were calculated by adding the maximum incremental (project only) $PM_{2.5}$ concentration of 2.5 µg/m^3 to the maximum 24-hour background concentration of 23.5 µg/m^3, resulting in a cumulative $PM_{2.5}$ concentration of 26 µg/m^3.

The AQIA then conducted a contemporaneous assessment of 24-hour $PM_{2.5}$ concentrations. The proposed project is not predicted to cause an additional exceedance of 24-hour $PM_{2.5}$ concentrations.

Particulate emissions were evaluated and modelled to be sourced from diesel truck emissions and emissions from other mobile plant equipment (loader and forklifts). However, it is unclear if the worst-case scenario or the typical emissions scenario is used in the dispersion modelling.

Recommendation

Given the nearest sensitive receptor is a childcare centre, the proponent must clarify which emissions scenario is modelled to assess offsite impacts. If the typical emissions scenario was modelled, we recommend the proponent provide the remodelled particulate offsite impacts using the worst-case scenario.

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2. Modelled meteorological data not provided

The AQIA used TAPM generated meteorological data for dispersion modelling as no site-specific data was not available. The AQIA was not correlated against the long-term site-representative meteorological data provided.

Recommendation

The proponent must demonstrate that the model generated meteorological data is acceptable by clearly establishing that the data adequately describes the expected meteorological patterns at the site.

3. Ventilation Emissions

The AQIA states three ventilation fans will be installed in the building roof to release air pollutants through exhaust vents and not as fugitive emissions through doors.

Recommendation

The AQIA states these designs are preliminary. Additional dispersion modelling based on final design should be undertaken to evaluate off-site impacts.

Consideration of ventilation design and placements should take into account minimisation of offsite impacts, particularly at the nearest receptor, the childcare centre.

4. Mitigation measures

Except for the roof ventilation fans and the enclosed building, no mitigation measures are proposed in the AQIA.

Recommendation

If the proposed project is approved the proponent must develop an air quality management plan that considers mitigation and control options should air pollution from operations result in increased offsite impacts than predicted in the AQIA. The EPA will be requiring that this be added as a condition on the environment protection licence.

Yours sincerely

BELINDA LAKE
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Environment Protection Authority