



Our reference: DOC19/1060074

The Secretary
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Attn: Shaun Williams

ELECTRONIC MAIL
5 December 2019

Dear Mr Williams

**Benedict Recycling Pty Ltd – Girraween Waste Recycling & Transfer Facility
State Significant Development No. SSD-9766 – Additional information required**

I refer to the above State Significant Development No. SSD-9766 application (application) which was received by the EPA on 13 November 2019 for comment by the Department of Planning, Industry and Environment (DPIE). The Applicant, Benedict Recycling Pty Ltd (Benedict) is seeking development approval from DPIE to construct and operate the Girraween Waste Recycling and Transfer Facility (Facility), which will process up to 220,000 tonnes of general solid waste (non-putrescible) per annum at 224-232 Toongabbie Road, Girraween (Lot 678 DP 9157).

The EPA has undertaken a preliminary assessment of the application, including a detailed Environmental Impact Statement (EIS) by EMM Consulting dated 6 November 2019 and has concluded that there is insufficient information to adequately assess the application and provide Conditions of Approval.

Specifically, the EPA refers to the Secretary's Environmental Assessment Requirements (SEARS) for the application, dated 21 December 2018. The SEARS require:

| SEARS requirement | EPA comment |
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| A quantitative assessment of potential demolition, construction, operational and transport noise and vibration impacts in accordance with relevant Environment Protection Authority guidelines. This is to include the identification of existing and potential future sensitive receivers and consideration of approved and/or proposed developments in the vicinity. | <p>EPA's assessment of Section 6.3 of the EIS, Noise and Vibration (pg. 75-81) and Appendix E Noise and Vibration Impact Assessment (NVIA) (dated 6 November 2019) has concluded that the road traffic noise assessment is inadequate.</p> <p>EPA asserts the NSW Road Noise Policy (RNP) has been incorrectly applied in the EIS and the noise criteria and noise modelling used by the proponent is inadequate for the following reasons:</p> <ul style="list-style-type: none">• Mandon and Girraween roads are local roads. Sub-arterial road criteria is used in the EIS and NVIA. The proponent is required to provide a traffic noise impact assessment using local road criteria for Mandon and Girraween roads. |

Phone 131 555

Fax +61 2 9995 5999

PO Box A290

59-61 Goulburn St

Phone +61 2 9995 5555
(from outside NSW)

TTY 133 677

ABN 43 692 285 758

Sydney South
NSW 1232 Australia

Sydney NSW
2000 Australia

info@epa.nsw.gov.au
www.epa.nsw.gov.au

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| | <ul style="list-style-type: none"> • Modelling distance from the traffic to the houses in Mandoon Road is stated at 13 meters in Table 6.7 of the NVIA. An analysis of Google maps shows this distance is significantly less than the 13 meters stated. This will result in under prediction. • Although the predicted traffic noise level in the NVIA is compliant with the nominated RNP noise criteria, if correct local road criteria is used and precise distances are used for the modelling, a more accurate assessment would be provided that would reflect a correct RNP application. <p>There is also an issue for trucks using Mandoon and Girraween Roads, as the roundabout is designed for light vehicles only.</p> |
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What you need to do

The EPA recommends that the Applicant consider the information above and provide the required information. Until this information is provided, the EPA is unable to adequately assess the environmental impacts of the application.

Please note that the EPA is also currently reviewing the air information provided to the EPA, and will provide further comment on these components. If you have any further questions in relation to this matter, please contact Nicholas Kumar on (02) 8275 1504.

Yours sincerely



LARA BARRINGTON
Unit Head Waste Compliance
Environment Protection Authority