

30 January 2020

Contact: *Juri Jung*
Telephone: *98652503*
Our ref: *D2020/6829*

Sally Munk
Principal Planner
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Munk

Mount Piper Energy Recovery Project (SSD 8294)

Thank you for the Department's correspondence dated 12 January 2020 seeking WaterNSW's comments on the Environmental Impact Statement (EIS) for the Mount Piper Energy Recovery Project (SSD-8294). WaterNSW appreciates the opportunity to provide detailed comments on this proposal.

The proposed development is located within the declared Sydney Catchment area. A legislative function of Water NSW is to protect and enhance the quality and quantity of water in this catchment.

WaterNSW has reviewed the EIS and has the following concerns regarding the potential water quality impacts from this proposal:

- The neutral or beneficial effect (NorBE) assessment in the Soil and Water Assessment (Appendix L, Chapter 6) is inadequate. However, Water NSW notes that water quality issues relating to potential contamination via ash placement and erosion sediment control plan are addressed in the previous chapters.
- The proposed stormwater management for the Energy Recovery Plant site (including 1.75 hectares of roof area and additional hardstand area) does not include specific stormwater management measures other than clean/dirty water diversion. Stormwater quality modelling using MUSIC software is required to design the stormwater treatment for the increased impervious area for the proposal to demonstrate NorBE.
- Consequently, it cannot be determined whether the Energy Recovery Plant site has a neutral or beneficial effect on water quality.

Notwithstanding the concerns listed above, WaterNSW considers that the project would likely achieve NorBE, subject to the provision of MUSIC stormwater quality modelling for the Energy Recovery Plant site that meets the requirements of WaterNSW's Current Recommended Practices (CRP) "*Using MUSIC in Sydney Drinking Water Catchment*" (WaterNSW 2019).

In that regard, WaterNSW requests that the following documents be prepared in consultation with WaterNSW:

- A MUSIC stormwater quality model for the Energy Recovery Plant site, and
- Soil and Water Management Plan and associated sub plans and monitoring programs including:

- detailed erosion and sediment control plans for the Energy Recovery Plant site and Ash Management Facility
- detailed stormwater management plans based on MUSIC stormwater quality modelling outputs, and
- leachate management plan.

WaterNSW requests to remain as a stakeholder for the proposal and any updates to relevant plans. WaterNSW would also appreciate being notified when the application has been determined.

If you wish to discuss further, please contact Juri Jung on 9865 2503 or email at environmental.assessments@waterNSW.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Preshaw'.

CLAY PRESRAW
Manager Catchment Protection