



Our reference: : EF13/5576 DOC20/589217
Contact: : Rebecca Scrivener – 02 6773 7000 – armidale@epa.nsw.gov.au
Date : 23 July 2020

Department of Planning
Industry Assessments
Level 29, 320 Pitt Street
SYDNEY NSW 2000

Email: maryellen.trimble@planning.nsw.gov.au

BY PLANNING PORTAL

Attention: Ms Mary Ellen Trimble

Dear Ms Trimble

RE: Request for EARs (SSD-8530563) - Proposed Resource Recovery and Waste Transfer Facility – 16 Torrens Road, Gunnedah

I refer to your email dated 17 July 2020 seeking Environmental Assessment Requirements (EARs) for the proposed Resource Recovery and Waste Transfer Facility at 16 Torrens Road, Gunnedah, NSW.

Based on the information provided, the Environment Protection Authority (EPA) expects the proposed activity to be a Scheduled Activity and will require an Environment Protection Licence (EPL) under the *Protection of the Environment Operations Act 1997*, should consent be granted. Please find attached EARs as requested for your consideration

If you wish to discuss this matter further, please contact me on (02) 6773 7000 or by email to armidale@epa.nsw.gov.au to discuss this matter further.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Rebecca Scrivener'.

REBECCA SCRIVENER
Head Regional Operations Unit – Regulatory Operations
Environment Protection Authority

Encl: Attachment A – Environmental Assessment Requirements for Proposed Resource Recovery and Waste Transfer Facility – 16 Torrens Road, Gunnedah (SSD-8530563)

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1 Environmental impacts of the project

1.1. The Environmental Assessment (EA) must address the requirements of Section 45 of the *Protection of the Environment Operations Act 1997* (POEO Act) by determining the extent of each impact and providing sufficient information to enable the EPA to determine appropriate conditions, limits and monitoring requirements for an Environment Protection Licence (EPL).

1.2. Impacts related to the following environmental issues need to be assessed, quantified and reported on:

- **Air Issues:** air quality including dust generation from the operation on the surrounding landscape and/or community;
- **Noise and vibration impacts** associated with crushing and screening, as well as operational noise particularly machinery and plant movements;
- **Waste** including hazardous materials, special wastes and liquid wastes. Consideration needs to be given to disposal options for waste materials unable to be accepted at the premises.
- **Water and Soils** including leachate and surface water management as well as sediment and erosion controls during construction and operation phases.

The EA should address the specific requirements outlined under each heading below and assess impacts in accordance with the relevant guidelines mentioned. A full list of guidelines is at **Attachment B**.

2 Licensing requirements

- 2.1. The development is a scheduled activity under the *Protection of the Environment Operations Act 1997* (POEO Act) and will therefore require an Environment Protection Licence (EPL) if approval is granted.
- 2.2. Should project approval be granted, the proponent will need to make an application to the EPA for its EPL for the proposed facility prior to undertaking any on site works. Additional information is available through the *EPA Guide to Licensing* document (www.epa.nsw.gov.au/licensing/licenceguide.htm).

SPECIFIC ISSUES

3 Air issues

- 3.1. The EA must demonstrate the proposal's ability to comply with the relevant regulatory framework, specifically the *Protection of the Environment Operations (POEO) Act (1997)* and the *POEO (Clean Air) Regulation (2002)*. Particular consideration should be given to section 129 of the POEO Act concerning control of "offensive odour".
- 3.2. The EA must include an air quality impact assessment (AQIA).
- 3.3. The AQIA must be carried out in accordance with the document, *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2005), which is available on our website at: <https://www.epa.nsw.gov.au/your-environment/air/industrial-emissions/modelling-assessing-air-emissions>
- 3.4. The EA must detail emission control techniques/practices that will be employed at the site and identify how the proposed control techniques/practices will meet the requirements of the POEO Act, POEO (Clean Air) Regulation and associated air quality limits or guideline criteria.

4. Noise and Vibration

The EA must assess the following noise and vibration aspects of the proposed development

- 4.1. Construction noise associated with the proposed development should be assessed using the *Interim Construction Noise Guideline* (DECC, 2009). These are available at: <https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/interim-construction-noise-guideline>
- 4.2. Vibration from all activities (including construction and operation) to be undertaken on the premises should be assessed using the guidelines contained in the *Assessing Vibration: a technical guideline* (DEC, 2006). These are available at: <https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/assessing-vibration>
- 4.3. If blasting is required for any reasons during the construction or operational stage of the proposed development, blast impacts should be demonstrated to be capable of complying with the guidelines contained in *Australian and New Zealand Environment Council – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration* (ANZEC, 1990). These are available at: <https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/interim-construction-noise-guideline>
- 4.4. Operational noise from all industrial activities (including private haul roads and private railway lines) to be undertaken on the premises should be assessed using the guidelines contained in the *NSW Noise Policy for Industry* (EPA, 2017). [https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-\(2017\)](https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-(2017))
- 4.5. Noise on public roads from increased road traffic generated by land use developments should be assessed using the guidelines contained in the *NSW Road Noise Policy* and associated application notes (EPA, 2011). <https://www.epa.nsw.gov.au/your-environment/noise/transport-noise>

5 Waste, chemicals and hazardous materials and radiation

- 5.1. The EA must assess all aspects of waste generation, management and disposal associated with the proposed development.
- 5.2. The EA must demonstrate compliance with all regulatory requirements outlined in the POEO Act and associated waste regulations.
- 5.3. The EA must demonstrate how the development will comply with any existing Resource Recovery Orders and Exemptions that are relevant. If there are no current orders or exemptions for the intended re-use of a waste resource produced by the proposed development, a specific order and exemption will need to be applied for with the EPA.
- 5.4. The EA must identify management measures to be implemented for all waste types received at the premises including asbestos waste, batteries, chemicals and unknowns. If disposal offsite is proposed, justification for the ultimate disposal site must be provided.
- 5.5. The EA must identify, characterise and classify the following in accordance with the EPA's *Waste Classification Guidelines (2014)* and associated addendums, including:
 - (i) all waste that will be generated onsite through excavation, demolition or construction activities, including proposed quantities of the waste;

- (ii) all waste that is proposed to be disposed of to an offsite location, including proposed quantities of the waste and the disposal locations for the waste. This includes waste that is intended for re-use or recycling.

Note: The EPA's *Waste Classification Guidelines (2014)* and associated addendums are available at: <https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste>

- 5.6. The EA must consider the goals, design and performance criteria identified in the EPA's guidelines, *Environmental Guidelines: Solid Waste Landfills* (EPA, 2016), available at: <https://www.epa.nsw.gov.au/publications/waste/solid-waste-landfill-guidelines-160259>
- 5.7. Outline contingency plans for any event that affects operations at the site that may result in environmental harm, including scenarios where excessive stockpiling of waste occurs, volume of leachate generated exceeds the storage capacity available on-site and similar.
- 5.8. The Proponent should also provide details of:
 - how leachate from stockpiled waste material will be kept separate from stormwater runoff;
 - treatment of leachate through a wastewater treatment plant (if applicable); and
 - any proposed transport and disposal of leachate off-site

6 Water

- 6.1. The EA must demonstrate how the proposed development will meet the requirements of section 120 of the POEO Act.
- 6.2. The EA must include a water balance for the development including water requirements (quantity, quality and source(s)) and proposed storm and wastewater disposal, including type, volumes, proposed treatment and management methods and re-use options.
- 6.3. If the proposed development intends to discharge waters to the environment, the EA must demonstrate how the discharge(s) will be managed in terms of water quantity, quality and frequency of discharge and include an impact assessment of the discharge on the receiving environment. This should include:
 - Description of the proposal including position of any intakes and discharges, volumes, water quality and frequency of all water discharges.
 - Description of the receiving waters including upstream and downstream water quality as well as any other water users.
 - Demonstration that all practical options to avoid discharge have been implemented and environmental impact minimised where discharge is necessary.
- 6.4. The EA must refer to Water Quality Objectives for the receiving waters and indicators and associated trigger values or criteria for the identified environmental values of the receiving environment. This information should be sourced from the ANZECC (2000) Guidelines for Fresh and Marine Water Quality (<http://www.environment.gov.au/water/policy-programs/nwqms/>).
- 6.5. The EA must describe how stormwater will be managed in all phases of the project, including details of how stormwater and runoff will be managed to minimise pollution. Information should include measures to be implemented to minimise erosion, leachate and sediment mobilisation at the site. The EA should consider the guidelines *Managing urban stormwater: soils and construction*, vol. 1 (Landcom 2004) and vol. 2 (A. Installation of services; C. Unsealed roads; D. Main Roads; E. Mines and quarries) (DECC, 2008).

- 6.6 The EA must describe any water quality monitoring programs to be carried out at the project site, Water quality monitoring should be undertaken in accordance with the *Approved Methods for the Sampling and Analysis of Water Pollutant in NSW* (2004), available on our website at: <https://www.epa.nsw.gov.au/your-environment/water/policies-guidelines-and-programs>.