



EPA Reference: DOC20/607708-26

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EMAIL

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Dear Ms Laguna

**Proposed expansion of Fairfield Sustainable Resource Centre (Application SSD-8184) -
Corner of Hassall Street and Widemere Road Wetherill Park NSW 2164**

Thank you for the request for advice from Public Authority Consultation (PAE-9063531), requesting the review by the NSW Environment Protection Authority (EPA) of the Environmental Impact Statement (EIS) for the proposed expansion of the Fairfield Sustainable Resource Centre (Application SSD-8184) at Corner of Hassall Street and Widemere Road Wetherill Park NSW 2164 (Lot 1 DP 515773, Lot 34 DP 657040, Lots 34 and 37 DP 3082, Lot 100 DP 1220637, Lots 1 and 2 DP 620755, Lot 1 DP 368374) (Premises), submitted by Fairfield City Council (Applicant).

The EPA has reviewed the EIS by DFP Planning Pty Limited dated August 2020 and understands the proposal is to increase the processing capacity of the facility up to 550,000 tonnes of material per year, extend operating hours, expand the operational area, and make changes to sediment basins.

Based on the information provided, the proposal will require an Environment Protection Licence (EPL) under sections 43, 47, 48 and 55 of the *Protection of the Environment Operations Act 1997* (POEO Act) for resource recovery and waste storage under clauses 34 and 42 of Schedule 1 of the POEO Act. The Applicant holds EPL 5713 (EPL) for scheduled activities at the Premises. If the proposal is approved, the Applicant will be required to submit a variation application to update the EPL accordingly.

The EPA has reviewed the EIS and its appendices and requests additional information in some aspects to enable adequate assessment of the proposal. The EPA provides the following comments and recommendations:

1. Matters to be addressed prior to determination

a. Construction Stage – Wastewater discharges

Recommendations:

- That the Applicant consider sediment basin design sizing and pollution mitigation measures consistent with the potential pollution risks to land and receiving waters, including options to avoid and minimise discharges.
- If there is potential for discharges to reach receiving waters, the Applicant must conduct a water pollution impact assessment. The level of assessment and consideration of practical

and reasonable mitigation measures should be commensurate with the potential water pollution risk/s. This assessment should include at a minimum:

- characterise the expected quality of discharges in terms of the concentrations and loads of all pollutants potentially present at non-trivial levels
- assess the potential impacts of the discharges on the environmental values of surface waters consistent with the Australian and New Zealand Guidelines for Fresh and Marine Water Quality Guidelines (2018) for slightly-moderately disturbed ecosystems, including average or typical through to worst-case scenarios
- where relevant, provide details of additional or alternative mitigation measures to address any identified impacts
- demonstrate how the proposal will be designed and operated to:
 - protect the Water Quality Objectives for receiving waters where they are currently being achieved; and
 - contribute towards achievement of the Water Quality Objectives over time where they are not currently being achieved.
- demonstrate that all practical and reasonable measures to avoid or minimise water pollution and protect human health and the environment from harm are investigated and implemented.

Reasoning:

Appendix 6 of the EIS states that during the construction stage wastewater would be diverted to either Sediment Basin 4 in the eastern end or Sediment Basin 5 in the north-western end of the Premises and discharged overland to Prospect Creek. The EIS states that dewatering of the sediment basins would be in accordance with *Managing Urban Stormwater: Soils and Construction Volume 1* (Landcom, 2004) and *International Erosion Control Association Best Practice Erosion and Sediment Control* (IECA, 2008).

Sampling was conducted for Sediment Basins 1-3 at the Premises on 15 April 2020 and were analysed for total recoverable hydrocarbons, polyaromatic hydrocarbons, benzene, toluene, ethylbenzene, xylenes and naphthalene and total metals (arsenic, cadmium, chromium, copper, lead, mercury, nickel and zinc). The sampling event highlighted that sediment basin water quality exceeded the slightly-moderately disturbed ecosystems *Australian and New Zealand Guidelines for Fresh and Marine Water Quality* (ANZG, 2018) guideline values for total recoverable hydrocarbons, chromium, copper, lead, nickel and zinc as summarised in the table below.

a. Analyte	b. Max result (µg/L)	c. ANZG guideline (µg/L)
d. Total recoverable hydrocarbons	e. 330	f. 7
Chromium	g. 46	h. 1
i. Copper	j. 37	k. 1.4
l. Lead	m. 15	n. 3.4
o. Nickel	p. 12	q. 11
r. Zinc	s. 43	t. 8

Note: Section 5.2.4 of *Appendix 18 Detailed Site Investigation* states that total metals were analysed to assess the potential risk of water reuse from the sediment basins for dust suppression

The proposed construction stage sediment basin discharges therefore pose a potential risk to waters if the discharge reaches Prospect Creek through, for example, preferential flow paths.

The design criteria for sediment basins utilised for erosion and sediment controls outlined in the Landcom (2004) guidelines are for managing clean sediment (i.e. no pollutants attached to sediment) and uncontaminated run-off from short-term urban subdivisions. As outlined in the table above, the sediment treatment measures at the Premises are not effective in the removal of pollutants from contaminated runoff.

The Applicant should consider measures to avoid discharges and minimise pollution such as, for example, larger basin sizing, pumping between basins, reuse for dust suppression where it is safe and practical to do so, or offsite disposal. Basin sizing should be commensurate with the potential risks to land and waters.

If following consideration of measures to avoid discharges, the Applicant still proposes construction stage discharges of potentially contaminated runoff, an impact assessment will be required commensurate with the potential risks to land and waters to inform considerations consistent with Section 45 of the POEO Act as part of response to submissions.

Regarding the operational stage, it appears that controlled discharges are not required due to a net water deficit. If discharges are proposed, a water pollution impact assessment will be required if there is the potential to impact receiving waters, as stated in the recommendations above.

b. Construction Stage - Erosion and sediment controls

Recommendation:

- That the Applicant commits to adopting enhanced erosion and sediment controls during the construction stage.

Reasoning:

Appendix 6 of the EIS states the proposed development on the eastern end of the Premises would level and expand the operational areas, involving bulk earth works to infill Sediment Basin 3 and a gully that runs along the centre of the existing Premises. The EIS indicates that approximately 30,789m³ of fill material consisting of virgin excavated natural material, excavated natural material and potentially stockpiled material would be used for the infilling works.

The EIS states that during construction, erosion and sediment controls to be implemented would include sediment fences around the proposed expansion areas on the north-west and eastern end of the Premises and downstream of batters and stockpiles. Given the duration and extent of the disturbance, the fact that the Premises is raised approximately 5-10m above the surrounding areas, and the proximity to Prospect Creek, enhanced erosion and sediment control measures should be implemented. This could include, for example, practices and principles consistent with *Managing Urban Stormwater Soils and Constriction Volume 2E Mines and Quarries* (DECC, 2008).

c. Operation Stage – Managed Overflows

Recommendation:

- That the Applicant provides details of the expected frequency, volume and the design storm criteria for all the sediment basins at the Premises when managed overflows would occur.

Reasoning:

Appendix 6 of the EIS states that contaminated runoff would be diverted to one of four sediment basins at the Premises and chemically treated to remove suspended solids. The treated wastewater would be pumped to the water storage tanks and reused onsite for dust suppression. The EIS states that the operational water demand for the proposed development is 45,000KL/year, with approximately 19,600KL (43%) to be harvested from the sediment basins and the remaining 26,000KL to be extracted from Prospect Creek under the existing water access licence (10CA103370).

The EIS states in the event of a large storm, overflows from the sediment basins would sheet flow approximately 100m overland to Prospect Creek. However, the water balance provided in the EIS does not detail the “large storm” rainfall event, expected frequency and volume of managed overflows that would occur for each of the four sediment basins.

d. Operation Stage – Leachate Management

Recommendation:

- That the Applicant clarifies the mitigation measures to be implemented to manage and minimise leachate generation and any potential leachate pollution impacts for the proposed development as part of the response to submissions.

Reasoning:

Appendix 6 of the EIS states that the capped landfill does not have a leachate collection system. The Licensee's existing leachate management practice consists of routine sampling upstream and downstream of Prospect Creek to monitor for potential leachate pollution from the existing Premises and the capped landfill.

Appendix 18 of the EIS states that a groundwater sampling event downgradient of the landfill cell beneath the proposed expansion area in the eastern end of the Premises was conducted in October 2017 to determine the impacts of leachate seepage to groundwater. Pollutants analysed include total recoverable hydrocarbons, polyaromatic hydrocarbons, benzene, toluene, ethyl benzene, xylenes, naphthalene, pesticides (organochlorine and organophosphorus) and metals (arsenic, cadmium, chromium, copper, lead, mercury, nickel and zinc).

Except for nickel and copper, the concentrations of the analysed pollutants were either below the detection limits or did not exceed the ANZG (2018) freshwater guideline for slightly-moderately disturbed ecosystems. The concentrations of nickel (14µg/L) and copper (2µg/L) exceeded the ANZG (2018) slightly-moderately disturbed guideline of 11µg/L and 1.4µg/L respectively.

However, Appendix 19 (Leachate Assessment) of the EIS states that the test pit logs indicate that the composition of the landfill cap is a poorly compacted gravel/clay/silt material. Appendix 6 of the EIS states that the earth works for the installation of Sediment Basin 4 involves excavating approximately 2 metres of the 3-metre thick landfill cap material. There is a potential risk that Sediment Basin 4 may act as a surface water infiltration point to the landfill cell, subsequently increase leachate generation and increase the risk of potential leachate seepage to groundwater.

Appendix 19 of the EIS recommended the following mitigation measures for the proposed development:

- The Applicant implements a plan that outlines the inspection, surface water monitoring and groundwater monitoring procedures for leachate management at the Premises
- The Applicant considers installing water diversion bunds upgradient of the operational areas of the Premises to minimise stormwater run-on and the subsequent generation of contaminated wastewater diverted to the sediment basins

It is unclear if the Applicant would implement the recommended mitigation measures.

e. Filling with stockpiled material

Recommendation:

- That the Applicant provide further information and clarification about the proposed earthworks associated with the proposal, specifically in regard to the potential use of stockpiled material for filling.

Reasoning:

The EIS states that the proposal involves *“Filling a gully through the centre of the site, known locally as ‘Canal Road’ and a small area of land to the south east of Canal Road fronting Hassall Street and use of this area for stockpiling of materials. Fill material is to be Excavated Natural Material (ENM), Virgin Excavated Natural Material (VENM) and potentially stockpiled material”*.

The EIS goes on to state that earthworks information is detailed in appendix 6. The EPA cannot identify throughout the EIS or Appendix 6 any description as to what ‘stockpiled material’ is intended to be used as fill on site. We therefore request clarification on this point and the classification of this material.

2. Matters to be addressed with conditions

a. Noise Management

The EPA recommends the following noise limit and management conditions to ensure noise is managed appropriately at the Premises and prevent impact on the community:

Traffic Noise Management Strategy

A Traffic Noise Management Strategy (TNMS) must be developed by the proponent, prior to commencement of construction and operation activities, to ensure that feasible and reasonable noise management strategies for vehicle movements associated with the facility are identified and applied, that include but are not necessarily limited to the following;

- driver training to ensure that noisy practices such as the use of compression engine brakes are not unnecessarily used near sensitive receivers,
- best noise practice in the selection and maintenance of vehicle fleets,
- movement scheduling where practicable to reduce impacts during sensitive times of the day,
- communication and management strategies for non-licensee/proponent owned and operated vehicles to ensure the provision of the TNMS are implemented,
- a system of audited management practices that identifies non conformances, initiates and monitors corrective and preventative action (including disciplinary action for breaches of noise minimisation procedures) and assesses the implementation and improvement of the TNMS,
- specific procedures for drivers to minimise impacts at identified sensitive receivers,
- clauses in conditions of employment, or in contracts, of drivers that require adherence to the noise minimisation procedures and facilitate effective implementation of the disciplinary actions for breaches of the procedures.

Noise Limit Conditions

- L6.1 Noise generated at the Premises must not exceed the noise limits at the times and locations in the table below.

Location	Noise Limits in dB(A)			
	Day	Evening	Night	Night
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{AFmax}

60 Rosford Street, Smithfield (Lot 16, DP 235675)	47	47	43	55
5 Hyland Road, Greystanes (Lot 32, DP 237689)	56	48	43	55

L6.2 For the purposes of condition L6.1:

- a) Day means the period from 7am to 6pm Monday to Saturday and the period from 8am to 6pm Sunday and public holidays.
- b) Evening means the period from 6pm to 10pm.
- c) Night means the period from 10pm to 7am Monday to Saturday and the period from 10pm to 8am Sunday and public holidays.

L6.3 Noise-enhancing meteorological conditions

- a) The noise limits set out in condition L6.1 apply under the following meteorological conditions:

Assessment Period	Meteorological Conditions
Day	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.
Evening	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.
Night	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level; or Stability category E and F with wind speeds up to and including 2m/s at 10m above ground level.

- b) For those meteorological conditions not referred to in condition L6.3(a), the noise limits that apply are the noise limits in condition L6.1 plus 5dB.

L6.4 For the purposes of condition L6.3:

- a) The meteorological conditions are to be determined from meteorological data obtained from the meteorological weather station identified as Bureau of Meteorology AWS at Horsley Park
- b) Stability category shall be determined using the following method from Fact Sheet D of the *Noise Policy for Industry* (NSW EPA, 2017):
 - i. Use of sigma-theta data (section D1.4).

L6.5 To assess compliance:

- a) with the $L_{Aeq(15 \text{ minutes})}$ or the L_{Amax} noise limits in condition L6.1 and L6.3, the noise measurement equipment must be located:
 - (i) approximately on the property boundary, where any residence is situated 30 metres or less from the property boundary closest to Premises; or where applicable,
 - (ii) in an area within 30 metres of a residence façade, but not closer than 3 metres where any residence on the property is situated more than 30 metres from the property boundary closest to the Premises; or, where applicable,
 - (iii) in an area within 50 metres of the boundary of a National Park or Nature Reserve,
 - (iv) at any other location identified in condition L6.1

- b) with the $L_{Aeq(15 \text{ minutes})}$ or the L_{Amax} noise limits in condition L6.1 and L6.3, the noise measurement equipment must be located:
 - (i) at the reasonably most affected point at a location where there is no residence at the location; or,
 - (ii) at the reasonably most affected point within an area at a location prescribed by condition L6.5 (a).
- L6.6 A non-compliance of conditions L6.1 and L6.3 will still occur where noise generated from the Premises is measured in excess of the noise limit at a point other than the reasonably most affected point at the locations referred to in condition L6.5 (a) or L6.5 (b).
- NOTE to L6.5 and L6.6: The reasonably most affected point is a point at a location or within an area at a location experiencing or expected to experience the highest sound pressure level from the Premises.
- L6.7 For the purpose of determining the noise generated from the Premises, the modifying factor corrections in Table C1 in Fact Sheet C of the *Noise Policy for Industry* (NSW EPA, 2017) may be applied, if appropriate, to the noise measurements by the noise monitoring equipment.
- L6.8 Noise measurements must not be undertaken where rain or wind speed at microphone level will affect the acquisition of valid measurements.

Noise Management Plan

- L6.9 The proponent must prepare and implement a Noise Management Plan that covers all Premises-based activities and transport operations. The plan must include but need not be limited to:
- a) all measures necessary to satisfy the limits in Table L6.1 at all times,
 - b) a system that allows for periodic assessment of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA) that has the potential to minimise noise levels from the facility,
 - c) Effective implementation of identified BMP and BATEA measures, where considered feasible and reasonable,
 - d) Measures to monitor noise performance and respond to complaints,
 - e) Measures for community consultation including site contact details,
 - f) Noise monitoring and reporting procedures.

Monitoring Conditions

M8 Requirement to Monitor Noise

- M8.1 Attended noise monitoring must be undertaken in accordance with Condition L6.5 and must:
- a) occur quarterly in a reporting period;
 - b) occur during each day, evening and night period as defined in the *Noise Policy for Industry* for a minimum of:
 - 1.5 hours during the day;
 - 30 minutes during the evening; and
 - 1 hour during the night.
 - c) occur for three consecutive operating days.

Reporting Conditions

R4 Noise Monitoring Report

A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the quarterly monitoring. The assessment must be prepared by a competent person and include:

- a) an assessment of compliance with noise limits presented in Condition L6.1 and L6.3; and
- b) an outline of any management actions taken within the monitoring period to address any exceedances of the limits contained in Condition L6.1 and L6.3.

Definitions of Noise Terms

- Noise Policy for Industry - the document entitled “*Noise Policy for Industry*” published by the NSW Environment Protection Authority in October 2017.
- Noise – ‘sound pressure levels’ for the purposes of conditions L6.1 to L6.8.
- L_{Aeq} (15 minute) - the value of the A-weighted sound pressure level of a continuous steady sound that, over a 15 minute time interval, has the same mean square sound pressure level as a sound under consideration with a level that varies with time (Australian Standard AS 1055:2018 *Acoustics: description and measurement of environmental noise*).
- L_{AFmax} – the maximum sound pressure level of an event measured with a sound level meter satisfying Australian Standard AS IEC 61672.1-2013 *Electroacoustics - Sound level meters - Part 1: Specifications* set to ‘A’ frequency weighting and fast time weighting.

b. Dust and Odour Management

The EPA recommends the following conditions to ensure dust from the Premises is managed appropriately and impacts to the environment and community are prevented:

General Dust Conditions

- The Premises must be maintained in a condition which minimises or prevents the emission of dust from the Premises.
- Activities occurring in or on the Premises must be carried out in a manner that will minimise the generation, or emission of dust from the Premises.

Meteorological monitoring

- The Applicant must monitor (by sampling and obtaining results by analysis) the parameters specified in Table 1, Column 1. The licensee must use the sampling method, units of measure, averaging period and sample at the frequency, specified opposite in the other columns.

Table 1: Required monitoring parameters for the on-site meteorological station

Parameter	Units of measure	Frequency	Averaging Period	Sampling Method
Rainfall	mm/hour	continuous	1 hour	AM-4
Sigma theta	degrees	continuous	10 minute	AM-2 and AM-4
Siting				AM-1
Temperature at 2 metres	kelvin	continuous	10 minute	AM-4
Temperature at 10 metres	kelvin	continuous	10 minute	AM-4

Total solar radiation	watts per square metre	continuous	10 minute	AM-4
Wind Direction at 10 metres	degrees	continuous	10 minute	AM-2 and AM-4
Wind Speed at 10 metres	metres per second	continuous	10 minute	AM-2 and AM-4

The EPA makes the following additional comments in relation to dust and odour management and may consider additional conditions on the EPL around these aspects, should the proposal be approved.

Significant Incremental Dust Impacts Predicted at Commercial Receivers

The EPA recommends the Applicant to undertake a review of the sites current air monitoring network and identify opportunities for improvements. It is recommended the Applicant incorporate monitoring which is suitably time resolved to inform both proactive and reactive dust management.

The EPA also recommends the Applicant develop and implement an air quality management strategy for the site. The plan(s) must include both proactive and reactive measures for all significant emission sources at the Premises, including haul roads. The strategy must include, at a minimum, include the following information for all dust generating activities at the site:

- Key performance indicator(s);
- Monitoring method(s);
- Location, frequency and duration of monitoring;
- Record keeping;
- Response mechanisms; and
- Compliance reporting.

Reasoning:

Dust emissions from the Proposal have been estimated using emission factors. The most significant dust generating activities on the Proposal Site are predicted to be from vehicles driving on unsealed roads (~84%). Other significant sources include wind erosion, processing of materials (crushing and screening) and material transfers.

The dispersion modelling has predicted incremental impacts from the development at nearby commercial Premises of up to 33 ug/m³ as shown in the excerpt below. These incremental impacts are considered significant.

Table 5-2 Predicted TSP & particulate matter impacts at sensitive receptors for 550,000 tonnes per year

Receptor	TSP		PM ₁₀				PM _{2.5}			
	Annual		24-hour		Annual		24-hour		Annual	
	Increment	Total	Increment	Total	Increment	Total	Increment	Total	Increment	Total
Goal	90 µg/m ³		50 µg/m ³		25 µg/m ³		25 µg/m ³		8 µg/m ³	
R1	0.3	48.3	2.7	39.4	0.2	19.4	0.3	22.0	0.0	8.8
R2	0.2	48.2	1.5	38.2	0.1	19.3	0.2	21.9	0.0	8.8
R3	0.3	48.3	1.8	38.5	0.2	19.4	0.2	21.9	0.0	8.8
R4	1.3	49.3	6.3	43.0	0.7	19.9	0.8	22.5	0.1	8.9
R5	0.7	48.7	8.7	45.4	0.4	19.6	1.1	22.8	0.0	8.8
R6	0.7	48.7	7.9	44.6	0.4	19.6	1.0	22.7	0.0	8.8
R7	1.2	49.2	7.4	44.1	0.7	19.9	0.9	22.6	0.1	8.9
R8	0.2	48.2	2.2	38.9	0.1	19.3	0.3	22.0	0.0	8.8
R9	0.1	48.1	1.0	37.7	0.1	19.3	0.1	21.8	0.0	8.8
R10	0.2	48.2	2.0	38.7	0.1	19.3	0.3	22.0	0.0	8.8
R11	0.2	48.2	1.3	38.0	0.1	19.3	0.2	21.9	0.0	8.8
R12	0.2	48.2	2.0	38.7	0.1	19.3	0.3	22.0	0.0	8.8
R13	1.9	49.9	10.4	47.1	1.0	20.2	1.2	22.9	0.1	8.9
R14	1.3	49.3	8.1	44.8	0.7	19.9	0.9	22.6	0.1	8.9
R15	1.4	49.4	8.8	45.5	0.7	19.9	1.0	22.7	0.1	8.9
R16	1.7	49.7	9.9	46.6	0.9	20.1	1.1	22.8	0.1	8.9
R17	4.1	52.1	22.8	59.5	2.1	21.3	2.7	24.4	0.2	9.0
R18	9.5	57.5	32.9	69.6	5.1	24.3	5.0	26.7	0.5	9.3
R19	0.3	48.3	4.0	40.7	0.2	19.4	0.5	22.2	0.0	8.8
R20	7.0	55.0	32.8	69.5	3.4	22.6	3.9	25.6	0.4	9.2
R21	2.1	50.1	12.1	48.8	1.1	20.3	1.6	23.3	0.1	8.9
R22	1.1	49.1	7.0	43.7	0.6	19.8	0.9	22.6	0.1	8.9

Whilst the predicted offsite impacts at nearby sensitive receivers are below the EPA's impact assessment criterion, the EPA notes there is some uncertainty in the predicted dust emissions for the following reasons;

- The number of rain days adopted in the calculations is 112. This is more than the average number of 84 which is given Table 2-2.
- Control factors of 50% for wind erosion and 75% for vehicle emissions from unsealed surfaces have been applied, with no justification.
- Site-specific meteorological data was generated through the use of a TAPM as no meteorological data is available for the site. The TAPM model included assimilation of data collected at the Horsley Park AWS – 6km from the site.

These added control factors are likely to underpredict off site ground level concentrations. To address some of this uncertainty, the licensee should implement a robust air quality management strategy for the site. The meteorological conditions at the site should also be monitored continuously at the site to help inform dust management activities at the site.

The site has a current ambient air monitoring network comprised of dust deposition gauges. The site has recorded high concentrations of deposited dust between 2011 and 2017, with maximum concentrations being measured in 2015 and 2016 as 6.6 and 6.9 g/m²/month via the monitoring network.

The EPA considers dust deposition gauges are generally not suitable for active site dust management. The monitoring approach promoted by the EPA is for licensees to design an appropriate monitoring network to inform proactive and reactive management of emissions, including dust. Monitoring should be fit for purpose and suitably time resolved to inform adequate reactive mitigation.

Low Potential for Odour where site operations are managed appropriately

The EPA recommends the Applicant consider proactive and reactive odour management measures as part of the sites broader air quality management strategy.

Reasoning:

The current EPL does not accept putrescible waste and employs two spotters to ensure that all loads that are deemed to contain putrescible waste or asbestos are rejected from the site. Therefore, no significant odour sources have been identified for the normal operations of the

facility. As a worst case, it is assumed that a partial load of putrescible waste would spend no more than 1 – 2 hours on-site.

The results of the odour assessment indicate a low potential for odour impacts. Notwithstanding this, the Applicant has obligations under Section 129 of the POEO Act to not cause or permit the emission of any offensive odour from the Premises.

c. Waste Management

The EPA recommends waste limit and management conditions to ensure waste is received and managed appropriately at the Premises. Limiting the type and amount of waste received are considered appropriate measures to ensure impacts to the environment and the community, particularly in relation to dust, noise and odour, are prevented.

The EIS does not state any changes to waste management at the Premises, stating that waste types received, authorised amount of waste, stockpile height, and processing procedures are proposed to remain the same as on the current EPL. The EPA therefore does not propose any changes waste limit and management conditions at this stage. The EPA would ensure all conditions in relation to these aspects are retained on the EPL for the Premises, should the proposal be approved.

3. Minor matters

a. Environmental Management Plan

The EPA recommends that an overarching Environmental Management Plan (EMP), as described in the EIS, be developed and submitted to the EPA with EPL variation application. The EMP should be implemented at the Premises and the EPA may incorporate aspects of this plan into conditions on the EPL.

b. Standards for managing construction waste in NSW

If the proposal is approved, the Applicant will be required to comply with the EPA's *Standards for Managing Construction Waste in NSW*. Details on how this will be complied with should be included in the EMP.

c. The EPA may provide further advice

The EPA is still revising the EIS in relation to potential contaminated sites requirements or comments. The EPA will either provide further advice on this aspect or notify Department of Planning, Industry and Environment that it has no further comments on the EIS by early October 2020.

If you have any questions about this submission, please contact Carla Thomas on (02) 9995 5302 or via email at RegOps.MetroRegulation@epa.nsw.gov.au.

Yours sincerely



LARA BARRINGTON
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