

21 October 2020

SF2020/186421; WST20/00363

The Manager
NSW Department of Planning Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Attn: Sheelagh Laguna

Dear Ms Laguna,

SSD-8968782: Pine Point Western Lands Lease (in the vicinity of Lot 2128 DP 764014) Silver City Highway (State Classified Road HW22) and Lot 1 DP 1083729 Pinnacles Road, Broken Hill
Request for SEARs for proposed Blue Bush Waste Facility

Thank you for referral of the abovementioned State Significant Development Application (SSD) to Transport for NSW (TfNSW) for input into the Secretary's Environmental Assessment Requirements (SEARs) via the NSW Major Projects Portal on 7 October 2020.

1. Project Understanding

Following review of the Scoping Report it is identified that the proposal includes construction and operation of:

- A transfer station (referred to as the 'Blue Bush Transfer Station' [or BBTS]) located west of the industrial precinct of Broken Hill, outside of the Broken Hill Local Government Area (LGA), within Unincorporated Land, and wholly within a Western Lands Lease.
- A near-surface geological repository (referred to as the Blue Bush Facility [BBF]) located approximately 45 kilometres south of Broken Hill and approximately 3.5 kilometres to the east of the Silver City Highway, outside of the Broken Hill LGA, within Unincorporated Land, and wholly within a Western Lands Lease pastoral property known as Pine Point.
- It is envisaged that the BBF would receive up to a maximum of 200,000 tpa of waste for approximately 25 years.
- Waste would be transported via rail from various ports of origin to the proposed BBTS. These ports of origin would include inter-modal rail facilities across states and territories of Australia. The waste generator would be responsible for the transport of waste to the proposed BBTS.
- Waste arriving to site would do so via a proposed rail spur line off the Adelaide-Sydney Railway Line. Where waste is located within several hundred kilometres and/or not within easy access to rail, it could be transported via road directly to the BBF.
- It is estimated that not more than 20 per cent of waste would be transported via road directly to the BBF.

Transport for NSW

51-55 Currajong Street PARKES NSW 2870 | PO Box 334 PARKES NSW 2870 DX20256
P 6861 1449 | W development.western@rms.nsw.gov.au | ABN 18 804 239 602

- Waste arriving at the BBTS would be temporarily stored in an open storage area (impervious hardstand or to an equivalent standard) until it is inspected and verified against the Blue Bush Project WAC.
- Once the waste has been verified, it would then be transferred via truck to the Silver City Highway (State Classified Road HW22) and on to the proposed BBF.
- Trucks carrying waste materials inside shipping containers would exit the site and travel along Pinnacles Road to Kanandah Road out of the Broken Hill Industrial Precinct to where Kanandah Road meets the Silver City Highway. At that T-intersection, heavy vehicles would make a right-hand turn on to the Silver City Highway and travel south for approximately 45 kilometres until reaching a proposed dedicated slip lane for entry into the BBF.
- Up to 200,000 tonnes of waste per annum could pass through the transit station and up to a maximum 20,000 tonnes could be stored at any one time at the BBTS.
- The transport of controlled or trackable waste would be carried out in accordance with the Protection of the Environment Operations Act 1997 (NSW) (POEO Act) and Protection of the Environment Operations (Waste) Regulations 2014 (NSW). Certain controlled or trackable wastes will also be classified as dangerous goods.
- Dangerous goods are classified according to their more immediate physical chemical properties (e.g. flammability, corrosivity, toxicity) and the transport of dangerous goods would be carried out in accordance with the Dangerous Goods (Road and Rail Transport) Act 2008 (NSW) and the Dangerous Goods (Road and Rail Transport) Regulations 2014 (NSW).
- Upon arriving at the BBF waste would be temporarily stored in an open storage area that would be appropriately secured and banded. It would then be transferred to waste cells for storage or permanent isolation.
- Vegetation, overburden and clay would be stockpiled separately adjacent to the pit for later re-use in closing the waste cell and for waste immobilisation, if needed.
- The following infrastructure would be constructed at the proposed BBTS:
 - Temporary open container storage area.
 - Road and rail interchange areas.
 - Office and maintenance and equipment storage sheds.
 - Internal roads and car parking.
 - Vehicle wash down facility.
 - Truck driver amenities.
 - Security fencing, cameras and lighting.
 - Stormwater drainage.
 - Electricity, water and sewerage services.

The following infrastructure would be constructed at the proposed BBF:

- Waste infrastructure that includes:
 - Excavated pits to be used as waste cells.
 - Stockpile areas for overburden and clay.
 - Container hardstand (for the temporary storage of waste).
 - Waste inspection and unloading areas and warehouses.
 - Waste laboratory.
 - Waste Immobilisation Plant (WIP) fitted with consumables storage, blending and mixing equipment and stormwater management system; and/or a fully enclosed chemical waste treatment and fixation pit fitted with a negative pressure fume extraction system and associated gas scrubbing system.

Transport for NSW

51-55 Currajong Street PARKES NSW 2870 | PO Box 334 PARKES NSW 2870 DX20256
 P 6861 1449 | W development.western@rms.nsw.gov.au | ABN 18 804 239 602

- Clay and kaolin processing equipment used in waste management.
- Cell cover(s) which could be in the form of an air dome(s) like the Sandy Ridge Facility in WA, are planned for waste cells with medium to high environmental, health and safety hazards and risks (e.g. air quality). Waste cells characterised as having lower environmental, health and safety hazards and risks may not require cell cover(s).
- Other ancillary infrastructure:
 - Administration building and workshop.
 - Laydown yard including repair and maintenance facilities.
 - Mobile equipment re-fuelling and washdown facility (including oily water separator and storage).
 - Site access roads and internal haul roads.
 - Vehicle wash down facility.
 - Secure site fencing and gatehouse.
 - A water treatment system and tanks for raw and potable water.
 - Wastewater treatment system and effluent disposal equipment.
 - Diesel storage tanks (including piping reticulation and bowsers).
 - Hydrocarbon/renewable hybrid power generation system.
- Permanent accommodation village, services and infrastructure (if required). Whilst the proponent would seek to utilise a local workforce to fill staff and contractor roles, it is possible that some specialist roles may require an alternative point of hire. In this case, a permanent accommodation village may be required for these personnel. Further investigations regarding the need for, and size of, a permanent accommodation village will be undertaken during the preparation of the EIS.
- Road upgrades at the intersection of the Silver City Highway and access road to the proposed BBF.
 - Construction-related infrastructure:
 - Temporary construction accommodation village, services and infrastructure.
 - Gravel borrow pit(s). Subject to geotechnical site investigations, gravel may need to be imported to enable the infrastructure area and site roads to be constructed to a suitable specification to meet a 25-year facility life. Gravel would be excavated from the borrow pit(s) and hauled to the infrastructure area for building purposes.

2. SEARs Input Requirements

TfNSW requests that the Environmental Impact Statement be supported by an Integrated Transport Assessment (ITA) prepared by a suitably qualified person in accordance with the *Austroads Guide to Traffic Management Part 12*, and any relevant TfNSW Supplements to *Austroads* and the *RTA Guide to Traffic Generating Developments*. The TIA is to address the following:

- Project schedule:
 - Hours and days of work, number of shifts and start and end times,
 - Phases and stages of the project, including construction, operation and decommissioning.

- Traffic volumes:
 - Existing background traffic,
 - Project-related traffic for each phase or stage of the project,
 - Projected cumulative traffic at commencement of operation, and a 10-year horizon post-commencement.
- Traffic characteristics:
 - Number, ratio and class of heavy vehicles to light vehicles,
 - Peak times for existing traffic,
 - Peak times for project-related traffic including commuter periods,
 - Proposed hours for transportation and haulage,
 - Interactions between existing and project-related traffic.
- A description of all over size and over mass vehicles and the materials to be transported.
- The origins, destinations and routes for:
 - Commuter (employee and contractor) light vehicles and pool vehicles,
 - Heavy (haulage) vehicles (including the vehicle class),
 - Over size and over mass vehicles.
- Road safety assessment of key haulage route/s.
- The impact of traffic generation on the public road network and measures employed to ensure traffic efficiency and road safety during construction, operation and decommissioning of the project.
- The need for improvements to the road network, and the improvements proposed such as road widening and intersection treatments, to cater for and mitigate the impact of project related traffic.
- Proposed road facilities, access and intersection treatments are to be identified and be in accordance with *Austroads Guide to Road Design* including provision of Safe Intersection Sight Distance (SISD).
- Local climate conditions that may affect road safety during the life of the project (e.g. fog, wet and dry weather, icy road conditions).
- The layout of the internal road network, parking facilities and infrastructure, including emergency and service vehicle access arrangements.
- Impact on public transport (public and school bus routes) and consideration for alternative transport modes such as walking and cycling (if/where applicable),
- Identification and assessment of potential impacts of the project, such as blasting, lighting, visual, noise, dust and drainage on the function and integrity of all affected public roads.
- Controls for transport and use of any dangerous goods in accordance with *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*, the Australian Dangerous Goods Code and Australian Standard 4452 Storage and Handling of Toxic Substances.
- In particular who has carriage and accountability of the waste from beginning to end throughout the transportation phases and how these differing phases will be suitably managed in the event of an incident.

- Assess the impact and risk of moving waste materials on the NSW network, paying particular attention to townships where high volumes of waste will be traversing through populated or sensitive areas.
- Assess the impacts and risks associated with moving dangerous goods on the Silver City Highway, Barrier Highway and local roads in the Broken Hill settlement area within particular consideration to the small number of available alternative routes in the area;
- Swept path diagrams should be provided depicting the largest vehicle required to access the site, exiting and manoeuvring throughout the transfer facility and permanent storage site in a forward direction;
- Forecast rail demand by materials handling and storage type with consideration of constraints and opportunities on the rail network is to be provided.
- Identify impact mitigation requirements for road maintenance over the 25 year operational life cycle and decommissioning period between the transfer station and permanent storage facility.
- The Proponent must liaise with the relevant rail network owners and operators to ensure the viability of access to the site and its source markets, specifically:
 - Liaise with Australian Rail Track Corporation (ARTC) on the proposed connections to the rail line west of Broken Hill. Details should include the railway connection design and operation taking into consideration the outcomes and requirements of this consultation;
 - Liaise with ARTC and other railway entities operating in NSW to confirm network capacity is available to meet the needs of the projects and any infrastructure requirements to support the operation;
 - Identify proposed dangerous goods routes on the NSW road and rail networks.
- Propose a Traffic Management Plan (TMP) be developed following approval of the EIS, in consultation with relevant Councils and TfNSW. The TMP would need to identify strategies to manage the impacts of project related traffic, including any community consultation measures for peak haulage periods.
- Propose a Driver Code of Conduct for haulage operations which could include, but not be limited to:
 - Safety initiatives for haulage through residential areas and/or school zones.
 - An induction process for vehicle operators and regular toolbox meetings.
 - A public complaint resolution and disciplinary procedure.
 - Consideration for the use of shuttle buses to transport employees to and from site to lessen the reliance on single vehicle use and offer improved road safety benefits to all roads users and employees.

TfNSW appreciates the opportunity to contribute to the SEARs and requests a copy is forwarded to us at the same time it is sent to the applicant at development.western@rms.nsw.gov.au.

Should you wish to discuss this matter further, please contact the undersigned on (02) 6861 1449.

Yours faithfully



Ainsley Bruem
A/Manager Land Use Assessment
Western Region