

**BDAR WAIVER FOR
GOW STREET RECYCLING CENTRE
81-87 GOW STREET, PADSTOW NSW 2211**

Prepared for: Gow Street Recycling Centre
Department of Planning and Environment
NSW Environment Protection Authority
Office of Environment and Heritage

Prepared by: Victoria Hale, Environmental Scientist
R T Benbow, Principal Consultant

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Benbow
ENVIRONMENTAL

Engineering a Sustainable Future for Our Environment

Head Office: 25-27 Sherwood Street, Northmead NSW 2152 AUSTRALIA
Tel: 61 2 9896 0399 Fax: 61 2 9896 0544
Email: admin@benbowenviro.com.au
Visit our website: www.benbowenviro.com.au

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DOCUMENT CONTROL

Prepared by:	Position:	Signature:	Date:
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Victoria Hale Environmental Scientist



08 April 2020

Reviewed by:	Position:	Signature:	Date:
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Linda Zanotto Senior Environmental Engineer



08 April 2020

Approved by:	Position:	Signature:	Date:
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R T Benbow Principal Consultant



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Benbow

ENVIRONMENTAL

A.B.N. 17 160 013 641

Head Office:

25-27 Sherwood Street Northmead NSW 2152 Australia

P.O. Box 687 Parramatta NSW 2124 Australia

Telephone: +61 2 9896 0399 Facsimile: +61 2 9896 0544

E-mail: admin@benbowenviro.com.au

Visit our Website at www.benbowenviro.com.au

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1. INTRODUCTION

Gow Street Recycling Centre propose to establish a drilling mud dewatering facility at their existing recycling centre located at 81-87 Gow Street, Padstow NSW 2211.

The purpose of this Biodiversity Waiver is to provide information to assist Regulatory Authorities with justification for the scope of the biodiversity assessment required for an Environmental Impact Statement (EIS), by outlining details of the proposed development and identifying potential environmental impacts.

Gow Street Recycling Centre currently has consent and holds an Environmental Protection Licence (#10943) for resource recovery and waste storage of building and demolition waste including asphalt waste. This includes a processing capacity of 80,000 tpa, and a maximum storage quantity of 7,300 tonnes at any one time.

The proposal will include a staged development. Stage 1 of the development is the focus of this scoping report and includes establishment of a drilling mud processing plant, with a capacity of 250,000 tonnes per year and storage of a maximum of 120,000 tonnes of liquid waste on site at any one time. These operations will take place on site 24/7.

Future stages of the proposed development include:

- Establishment of a Concrete batching plant with a processing capacity of 500,000 tpa; and
- Increase in the processing capacity of the current resource recovery facility on site to 250,000 tpa and an increase of storage quantity to 10,000 tonnes at any one time.

Approval for future stages is not sought at this time.

Stage 1 of the proposal constitutes State Significant Development (SSD) under the State Environmental Planning Policy (State and Regional Development) 2011 as it falls under the definition of a waste and resource management facility that would handle more than 1,000 tonnes per year of liquid industrial waste.

The environmental assessment process for State Significant Development requires that an EIS be prepared that satisfies the requirements in Schedule 2 of the Environmental Planning and Assessment Regulation 2000.

The following sections provide the details of the proposed development, the relevant planning considerations, and expected potential environmental impacts that need to be addressed in an Environmental Impact Statement. This Report supports the application for Secretary's Environmental Assessment Requirements (SEARs) for both stages of the proposed development.

2. DESCRIPTION OF THE DEVELOPMENT

The proposed development involves the construction and operation of a drilling mud dewatering facility located at the existing Gow Street Recycling Centre site (81-87 Gow Street, Padstow NSW 2211).

Gow Street Recycling Centre currently has consent and holds an Environmental Protection Licence (#10943) for C&D resource recovery. It holds a processing capacity of 80,000 tpa and a maximum storage quantity of 7,300 tonnes at any one time.

The proposed drilling mud dewatering facility would have a processing capacity of 250,000 tonnes per annum and would store a maximum of 120,000 tonnes of liquid waste at any one time.

These operations will take place on site 24/7.

2.1 PRODUCTION AND OPERATION PROCESSES

The proposed development and respective production and operational processes are briefly described below. A full detailed description would be provided in the EIS.

2.1.1 Drilling Mud Processing Plant

The dewatering facility would operate as a recycling facility for drilling mud and concrete washout water and site stormwater. The facility would involve the following activities:

- Unloading of drilling mud/concrete washout water into on-site tanks;
- Site stormwater directed into on-site tanks;
- Liquid waste transferred over screen with high pressure water;
- Aggregates sorted into bays and tanks (depending on size) for recycling;
- Water separated for reuse; and
- Unusable clays/silts pressed into biscuit for application to land under the Treated Drilling Mud Exemption 2014 or landfill.

The maximum process quantity of drilling mud dewatering and concrete washout processing in a 24 hour period is approximately 1,500 tonnes.

The dewatering plant will be located in an existing shed on site which is approximately 12m x 17m in area. All the liquids will be in tanks, no large settling ponds or the like are proposed.

2.2 SITE LAYOUT

Figure 2-1 shows the preliminary site plan of the development.

The site plan illustrates the proposed dewatering facility and associated infrastructure. The layout includes:

- Left Side (Gow Street):** An existing driveway, parking spaces, an existing office, an existing weighbridge, a proposed office, and a wheel wash.
- Center:** An existing workshop, a proposed dewatering facility (located inside an existing building), and a large area for existing and proposed material storage (brick/tile/concrete, uncrushed concrete, crusher, and agg screen).
- Right Side:** Existing material storage (brick/tile/concrete, uncrushed concrete), an existing crusher, an existing agg screen, and various material storage piles (dust, 10mm agg, 20mm agg, DGB roadbase).
- Infrastructure:** A sewer line, pavement to drain water, and an existing exit driveway.



2.3 HOURS OF OPERATION

Currently the operational hours are: 06:00 and 18:00 Monday to Friday, and 07:00 and 18:00 on weekends.

The facility proposes to operate 24 hours a day, seven days a week.

2.4 EMPLOYMENT

The proposed facility will retain nine (9) existing staff and employ approximately 10 new staff members.

2.5 CONSTRUCTION WORKS

Construction of the drilling mud processing plant and office will be undertaken on site and expected to be completed within 4 months. A Construction Environmental Management Plan (CEMP) will be undertaken as part of the EIS and will address any site runoff issues.

3. LOCATION

The proposed development is to be located at 81-87 Gow Street, Padstow NSW 2211 ("the subject site"), legally described as Lot A DP 103140. The location of the subject site as an aerial view is shown in Figure 3-1 and its location in a local context is shown in Figure 3-2.

Figure 3-1: Location of Subject Site

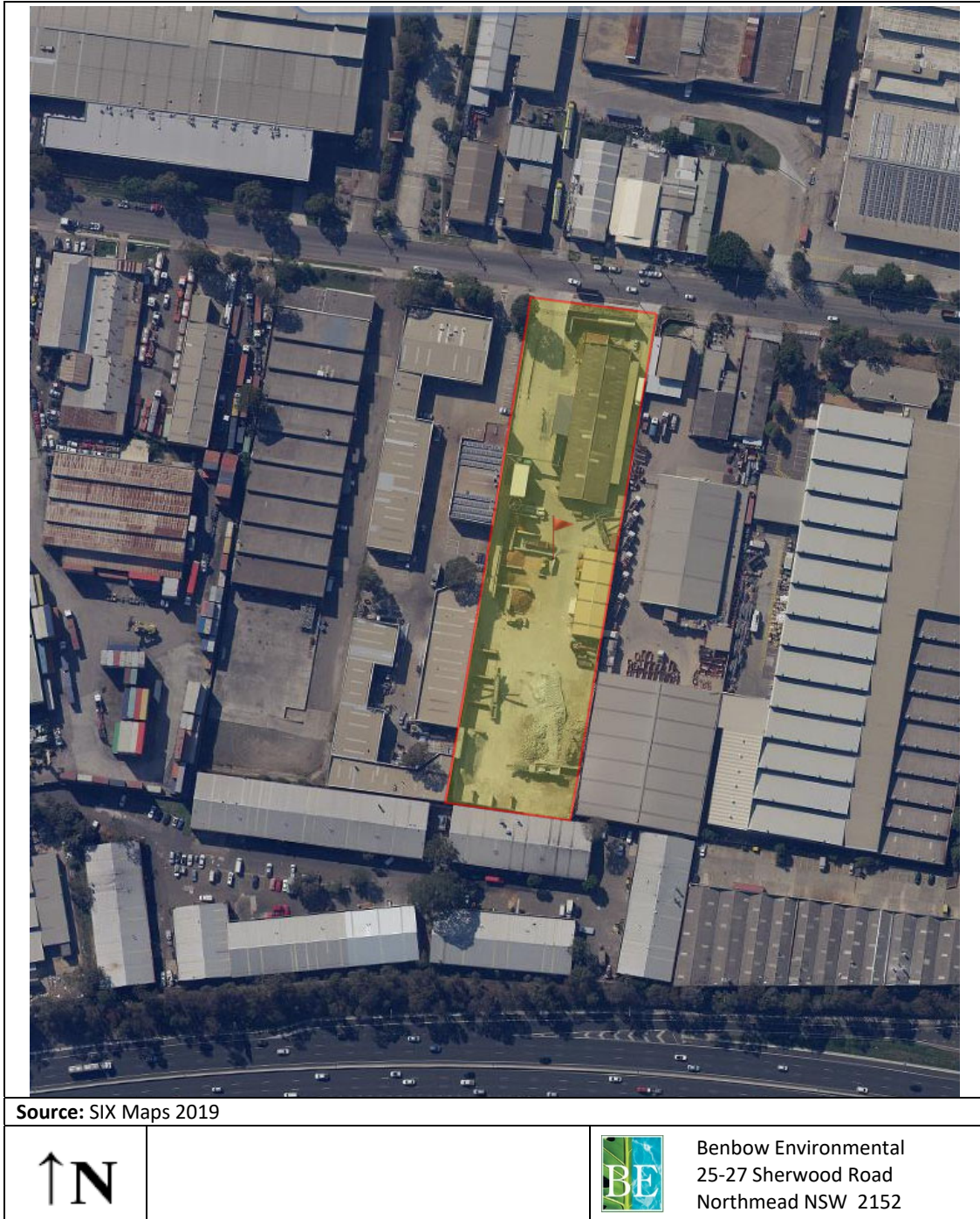


Figure 3-2: The Site Location in a Local Context

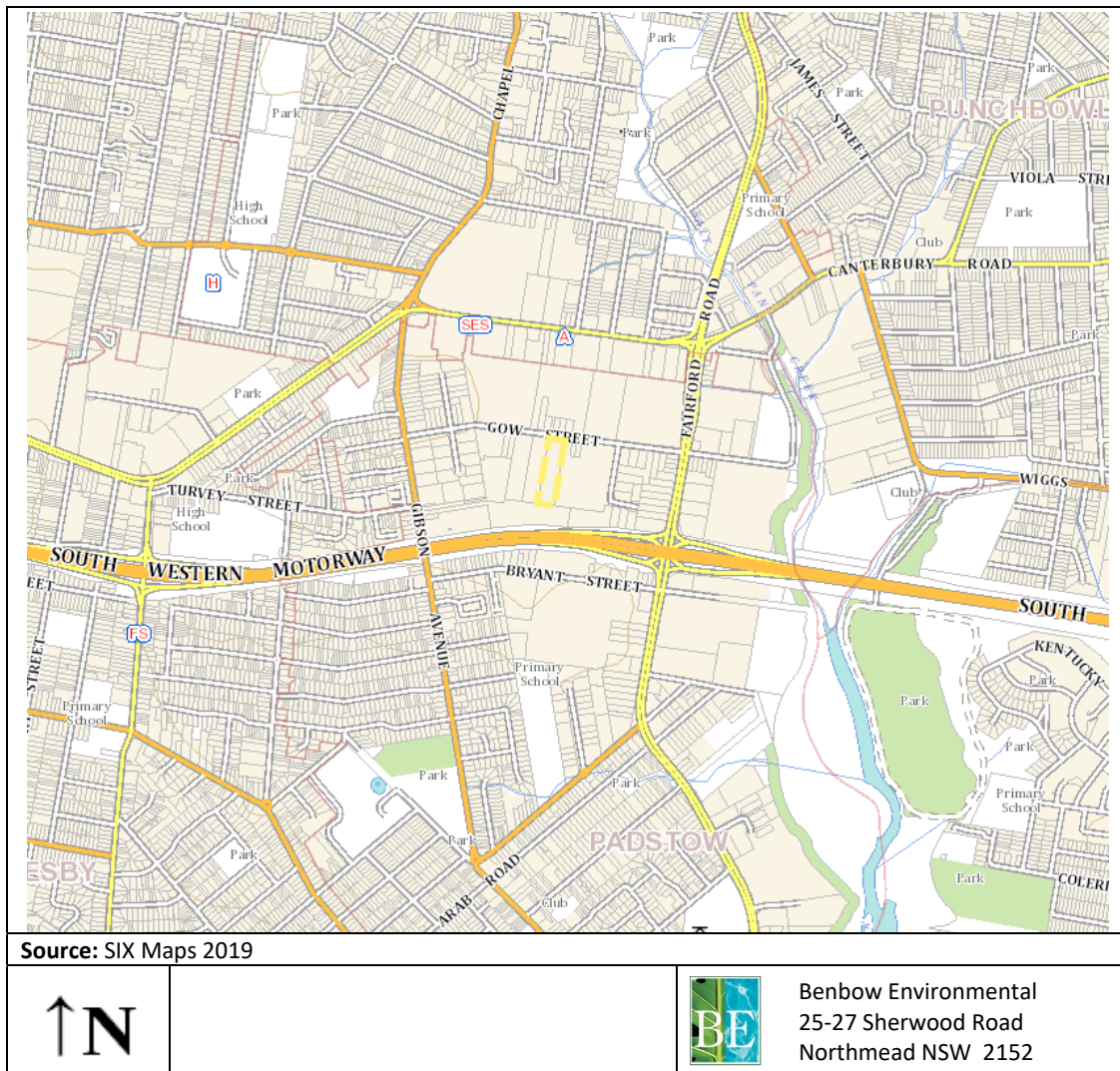
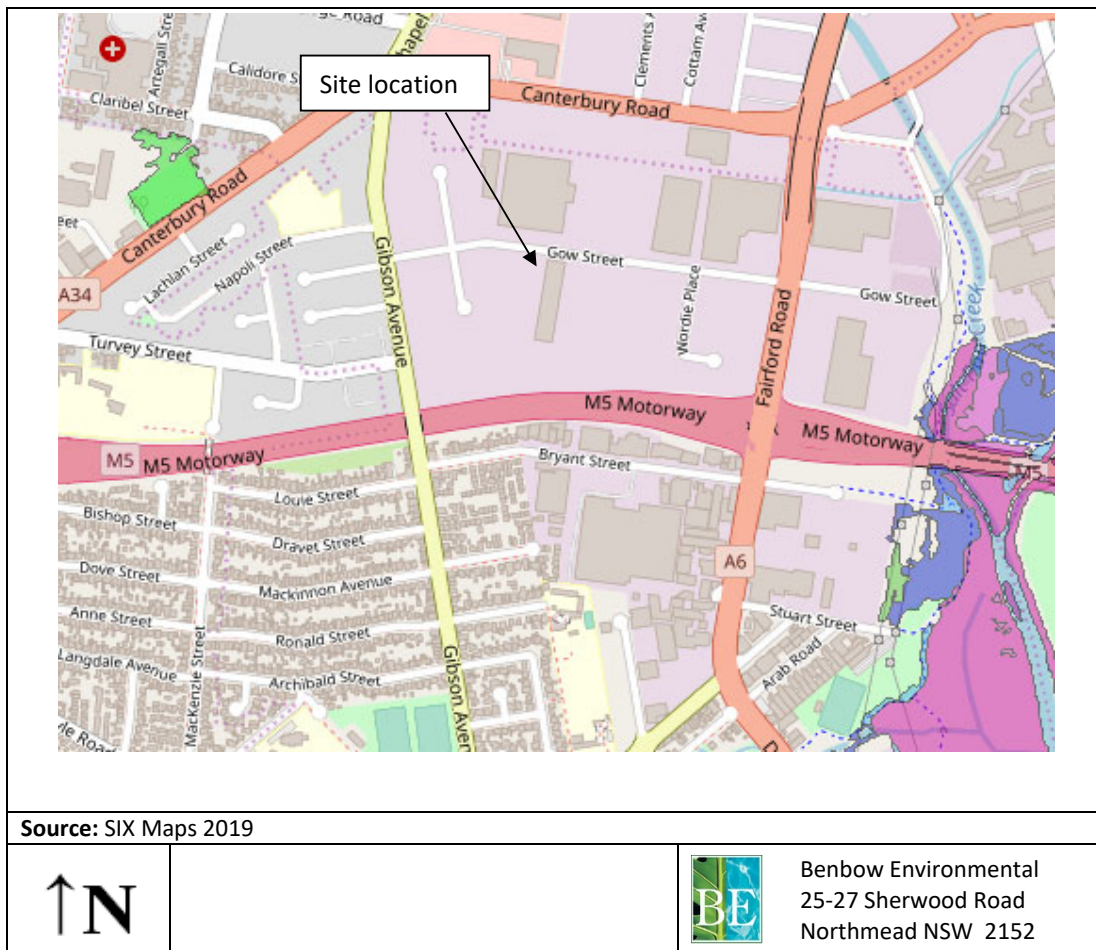


Figure 3-3: Vegetation and Plant Community Map





4. POTENTIAL BIODIVERSITY IMPACTS

4.1 VEGETATION ABUNDANCE 1.4(B) BC REGULATION

The proposed development will not result in removal of existing vegetation or a change to landscaping of the site as the site is already developed. The site is not in close proximity to any critical habitats. The flora and fauna impacts are considered negligible.

4.2 VEGETATION INTEGRITY 1.5(2)(A) BC ACT

Vegetation is not present on site as the site is fully covered with concrete hardstand. No threatened plant communities have been located in proximity to the site.

4.3 HABITAT SUITABILITY 1.5 (2)(B) BC ACT

Habitat features for threatened flora or fauna are not present onsite. A targeted search within 10 km of the site was conducted using the BioNet Atlas of NSW Wildlife website. The search criteria included all valid records, from the past five years, of entities threatened in NSW under the *Threatened Species Conservation Act 1995* and entities threatened nationally under the *Environment Protection and Biodiversity Conservation Act 1999* within a selected area. The search found that there are no vulnerable/vulnerable-protected species within that distance.

1. Karst, caves, crevices, cliffs and other geological features of significance

Not present on site.

2. Rocks

Not present on site.

3. Human-made structures

The current structures and future construction is not expected to be used by threatened species such as microbats, as it is not critical habitat for these species.

4. Non-native vegetation (prescribed under clause 6(1)(a) of the BC Regulation)

Not present on the site. The whole site is covered with concrete hardstand.

4.4 THREATENED SPECIES ABUNDANCE 1.4(A) REGULATION

A targeted search within 10 km of the site was conducted using the BioNet Atlas of NSW Wildlife website. The search criteria included all valid records, from the past five years, of entities threatened in NSW under the *Threatened Species Conservation Act 1995* and entities threatened nationally under the *Environment Protection and Biodiversity Conservation Act 1999* within a selected area. The search found that there are no vulnerable/vulnerable-protected species within that distance.



Vegetation is not present on site. No demolition will take place, only additions to the site. Therefore, no human-made habitat features will be lost. The development will not affect any waterways.

Vehicle Impacts

A traffic assessment will be conducted for the proposed development. Vehicle strikes on threatened species of animals/ animals that are part of threatened ecological communities are not expected to increase as a result of the associated traffic with the site, as there is a lack of critical habitats in the immediate vicinity and no nearby sightings of threatened species.

4.5 HABITAT CONNECTIVITY 1.4(c) BC REGULATION

The site does not contribute towards habitat connectivity as there are no landscape connectivity features. Additionally, there is no vegetation on site or features that facilitate the movement of threatened species.

4.6 FLIGHT PATH INTEGRITY 1.4(e) BC REGULATION

Protected fauna will not have their flight paths impacted by the site. Additions to the site will not exceed the building height limits and construction will be minor. The immediate surrounding area does not compose of habitat features that protected fauna would access.

4.7 WATER SUSTAINABILITY 1.4(f) BC REGULATION

There are no water bodies located on site or in the immediate vicinity of the site, therefore the development will not impact any water bodies. Potential run-off from construction activities will be contained and a construction environmental management plan put in place.



5. CONCLUDING REMARKS

This Biodiversity Development Assessment Report Waiver has been prepared to assist Regulatory Authorities with justification for the scope of the biodiversity assessment required for an Environmental Impact Statement (EIS).

Gow Street Recycling Centre propose to establish a drilling mud dewatering facility at their existing recycling centre located at 81-87 Gow Street, Padstow NSW 2211.

The site is well located to serve the needs of the growing region of Sydney's south west by recovering useful materials generated from various current and future infrastructure projects.

The BDAR waiver shows that the proposed development will not negatively impact the surrounding environment. Currently there is not any existing vegetation on site and the site is not in close proximity to any critical habitats. Any impacts on flora and fauna are considered negligible.

This concludes the BDAR.

Victoria Hale
Environmental Scientist

R T Benbow
Principal Consultant



6. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

This report has been prepared solely for the use of Gow Street Recycling Centre, as per our agreement for providing environmental services. Only Gow Street Recycling Centre is entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

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