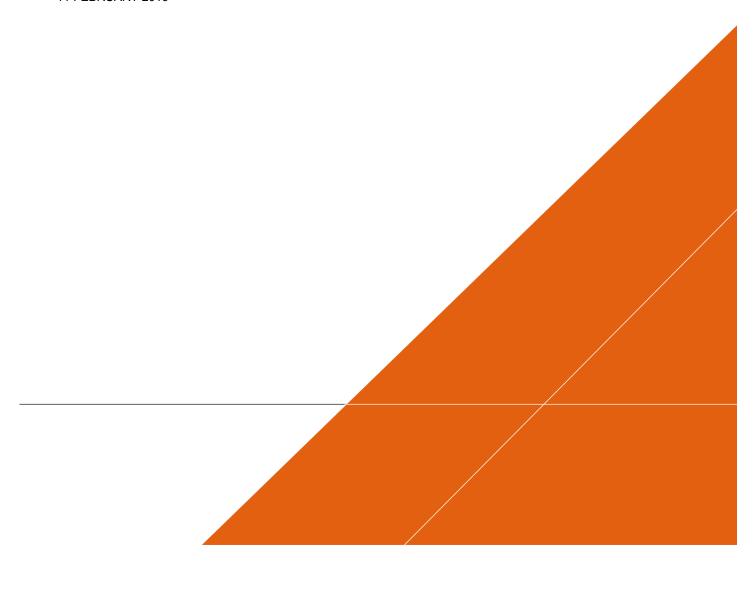


METAL RECOVERY, PROCESSING & RECYCLING FACILITY

45/23-43 Tattersall Road, Kings Park

Section 4.55(1A) Application (SSD 5041 – Mod 3)

11 FEBRUARY 2019



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SELL & PARKER METAL RECOVERY, PROCESSING & RECYCLING FACILITY

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Section 4.55(1A) Application (SSD 5041 – Mod 3)

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Revision Text 02

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GLOSSARY

Key Terms	Definition
Modification Proposal	The modifications outlined in this report
The Original Approval	The approved Environmental Impact Assessment for SSD 5041
Modification 1 (MOD 1)	The approved modifications to The Original Approval dated 6 July 2017
Modification 2 (MOD 2)	The approved modifications to The Original Approval and approved MOD 1 dated 26 February 2018
The Project	The approved activities under SSD 5041, MOD 1 and MOD 2
The Site	The Sell and Parker Premises at 23-43 and 45 Tattersall Road, Kings Park NSW

EXECUTIVE SUMMARY

Sell and Parker (the Applicant) currently own and operate a metal recycling facility at 23-43 and 45 Tattersall Road, Kings Park (The Site). The Site currently operates under approval SSD 5041 (the Original Approval) and two associated modifications (the Project).

Recent changes in market and policy conditions including the introduction of China's National Sword Policy have resulted in the need to Modify the original approval (the Modification Proposal). To respond to these changes, the Applicant proposes to modify the following elements:

- Installation of a metal awning and processing equipment
- · Changes to fencing and signage
- Installation of offices and amenities within Building A and Building B
- Installation of amenities with the yard area
- Relocation of the pre-shredder
- Minor realignment of the conveyor
- Extension of operational hours
- Administrative changes

Approval to Modify the original proposal (SSD 5041) is being sought in accordance with Section 4.55 (1A) of the EP&A Act.

This document provides an assessment of the potential change in environmental impacts resulting from the Modification Proposal. Key environmental issues investigated to support the assessment included Air Quality and Odour, Noise and Vibration, Fire and Incident Management, Soil and Water, Visual and other issues. The assessment identified that with the implementation of the proposed mitigation measures as summarised in Section 7, the Modification Proposal would not result in an increase in the impacts as identified with the EIS for the Original Approval.

1 INTRODUCTION

This modification application has been prepared on behalf of Sell and Parker and is seeking approval to modify Waste Metal Recovery, Processing and Recycling Facility Expansion (SSD 5041) (original approval) which relates to the expansion of an existing metal recycling facility on Tattersall Road in Kings Park, NSW. This application has been prepared pursuant to Section 4.55 (1A) of the Environmental Planning and Assessment Act 1979 (EP&A Act).

1.1 Overview

Sell and Parker (the Applicant) currently own and operate a metal recycling facility at 23-43 and 45 Tattersall Road, Kings Park (The Site). The Site currently operates under approval SSD 5041 (the Original Approval) and two associated modifications (the Project). To respond to changing market and policy conditions the applicant has proposed to modify the original approval (the Modification Proposal). Changes to the Original Approval as part of the Modification Proposal include:

- Installation of a metal awning and processing equipment
- Changes to fencing and signage
- Installation of offices and amenities within Building A and Building B
- Installation of amenities with the yard area
- Relocation of the pre-shredder
- Minor realignment of the conveyor
- Extension of operational hours
- Administrative changes

1.2 Background

1.2.1 Applicant and Capital Investment Value

Sell and Parker (the Applicant) purchase, sell and process all types of Ferrous and Non-Ferrous metals. Their facilities are located strategically throughout NSW and Australia including Sydney (Blacktown, Banksmeadow, Ingleburn) the NSW North Coast (Coffs Harbour), NSW South Coast (Nowra) and Hunter Region (Newcastle). Other facilities throughout Australia include Darwin and Port Headland.

Sell and Parker hold a licence (number A03604008) issued by the AQSIQ agency of the Chinese Government allowing them to export scrap metal to China. They are also one of only three accredited suppliers to BlueScope Steel. As a result, Sell & Parker has the opportunity to pursue growth in metropolitan markets via economies of scale, vertical integration (acquisition) and superior networks that help reduce transportation costs and improve service delivery. The Kings Park facility forms an important piece of Sell and Parker's network, servicing the Sydney metropolitan area.

The Capital Invest Value of the Modification Proposal is approximately \$750,000.

1.2.2 Existing approvals (SSD 5041)

In November 1996, Blacktown City Council approved a metal recycling facility with a throughput capacity of 30,000 tonnes per annum (tpa) on the southern portion of 45 Tattersall Road. Since this time there have been a number of changes to the Site to improve operation efficiency, safety and environmental impact. In 2001 throughput

was increased to 90,000 tpa when the Land and Environment Court approved the establishment of a metal shredder on the northern part of 45 Tattersall Road.

The Site currently operates under SSD 5041 which was granted by DP&E on the 12th of November 2015. SSD 5041 allowed for:

- An increase in throughput from 90,000 tpa to 350,000 tpa
- Expansion of the Site to include the neighbouring lot 23-43 Tattersall Road

Subsequent to this approval, two modifications have been approved:

- Modification 1 Granted by DP&E on 6 July 2017, including amendment to the Site layout, design of buildings and structures and alterations and additions to existing buildings and structures
- Modification 2 Granted by DP&E on 26 February 2018, including changes to the acoustic wall, Site entrance and construction of an awning. (went to court then was approved

This expanded facility is in the final stages of construction with operations anticipated to commence in the third quarter of 2018. Sell and Parker have identified the need for a number of built form changes (the Modification Proposal) to the approval to optimise the Site operations.

1.3 Consultation

A number of consultation activities have been undertaken throughout the preparation of this report. A summary of these activities is provided below.

1.3.1 Department of Planning and Environment (DP&E)

On the 13 September 2018, a meeting was undertaken with DP&E representatives and Sell and Parker to discuss the Modification Proposal. A summary of the key outcomes from the meeting and where each of these have been discussed within this report is provided in Table 1.

Table 1 DP&E Meeting outcomes

Topic	Comment	Where addressed in this report
SSD Modification (Mod 3 to SSD 5041)	 Environmental assessment (EA) to be provided including (but not limited to): Waste management Noise Air Fire and incident management/hazard and risk 	Section 6 (Environmental assessment)
	Provide justification in the Modification (EA) that this equipment is primarily (item 1 above) required in relation to the China National Sword Policy. Other items (items 2-5 above) are required for safety and amenity related operational aspects.	Section 3 (Modification Proposal justification and need)
	DP&E confirmed that no SEARs would be required for the Modification.	n/a

A number of other discussions were also undertaken in relation to the Fire Order on the Site. To date, Sell and Parker have undertaken a number of works on the Site to comply with this Fire Order. However, full compliance with the Fire Order would not be achieved until the determination of this Modification Proposal as the Fire Order covers infrastructure that is proposed to be altered as a result of the Modification Proposal.

Further information has been provided to DP&E from Sell and Parker in relation to the fire order. Items relevant to compliance with the fire order have been included in this assessment.

1.4 Structure of this report

The structure of this report is as follows:

- Section 1 Introduction: provides an overview of the applicant and previous approvals for SSD 5041 and a summary of consultation activities.
- Section 2 Site description: provides a summary of the Site and its context and the area of impact for the Modification Proposal.
- Section 3 Modification Proposal justification: provides a detailed justification for the modification proposal.
- Section 4 Proposed modification: provides a detailed description of the Modification Proposal and the proposed modification to the SSD 5041 approval.
- Section 5 Statutory planning assessment: provides an assessment of the Modification Proposal against the relevant statutory planning documents and considers whether the Modification Proposal is 'substantially the same development' as the existing Site under SSD 5041
- Section 6 Environmental assessment: provides an environmental assessment of the Modification Proposal
- Section 7 Summary of mitigation measures: provides a summary of all mitigation measures that have been proposed in the environmental assessment
- Section 8 Conclusion: provides a summary and conclusion to this modification application report

The following appendices are included in this modification application report:

- Appendix A SSD 5041 Approval / Mitigation Measures (as modified by MOD 1 and MOD 2)
- Appendix B Engineering Plans
- Appendix C Fire management Plans and assessment
- Appendix D Air quality impact assessment
- Appendix E Noise and vibration impact assessment
- Appendix F Consolidated list of mitigation measures

2 SITE DESCRIPTION

2.1 Site context

The Site is located within the Blacktown City Council Local Government Area (LGA), in an area characterised by general industrial development. Access to the Site is from Tattersall road, to which the Site has approximately 240m of frontage. Tattersall road is a two-lane road which connects to Sunnyholt Road to the east, and Vardys Road to the north-west, both of which are four lanes. Sunnyholt Road connects in turn to the M7 1.2 km to the north of the Tattersall Road intersection. The area of the Site is approximately 6.4 hectares.

Key features of the area surrounding the Site include:

- Tattersall Road to the north, with light and general industrial activities on the opposite side.
- An intermittent drainage channel to the east of the Site, which connects directly to Breakfast Creek – a highly modified watercourse which flows along the southern boundary of the Site. Both watercourses separate the Site from other industrial developments.
- An automotive wrecking and recycling facility to the west with further industrial activities beyond.
- The nearest residential development is approximately 300 metres to the east, with industrial structures and Sunnyholt Road between the Site and these residential receivers.

2.2 Site description

The Site is currently used as a metal recycling and processing facility and includes a number of structures and associated infrastructure including:

- Warehouses
- Offices
- Mechanical equipment (including pre-shredder, shredder and forklifts)
- Water management infrastructure (including a floc pit, detention/irrigation pond, sludge bund and clean water tanks
- Roads and carparking

External areas of the Site are largely covered by hardstand, with runoff directed to a water treatment system and storage dam. A number of scrap metal stockpiles are located on the western part of the Site near the metal shredder.

With the exception of the floc shed annex (due for completion in the second quarter of 2019) the facility as described in SSD 5041 and the subsequent modifications has been fully constructed and operations have commenced. Elements that have been recently constructed as approved under SSD 5041, include:

- Reconfiguration of the Site to include 23-43 Tattersall Road
- The replacement of the approved dual-entry weighbridge structure with a singleentry weighbridge
- Relocation of the weighbridge within Building B for outgoing vehicles
- Construction of the non-ferrous processing enclosure and covered conveyor

- Increase in height of the acoustic wall along the western edge of the Site from 8m to 10m, and replacing the precast concrete panels and mesh with steel cladding.
- Removal of existing 2 storey building and weighbridge on 45 Tattersall Avenue

The location of the Site and local area is shown in Figure 1.



d the Site

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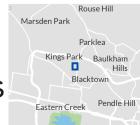


Figure 1: Site location and local area

3 MODIFICATION PROPOSAL JUSTIFICATION AND NEED

3.1 Objectives

A number of objectives have been identified to guide the proposed modifications based on the project need. These include:

- To meet higher recycling contamination standards prescribed by China's National Sword Policy
- To optimise the efficiency of site processes
- To improve the safety through minimising conflicts between heavy and light vehicle movements and staff pedestrian movements
- · To improve environmental performance of the Site

3.2 China's National Sword Policy

In March 2018 the Chinese Government introduced new import restrictions on 24 types of recycling commodity, reducing the maximum allowable contamination in those streams from 5–10% to between 0.5% and 1%, depending on the material. For many commodity types the National Sword Policy contamination limits effectively constitute a ban on exporting to China as it is not financially feasible to separate them to that degree. For scrap metals the key limits are:

- 1% Non-ferrous
- 0.5% Ferrous
- 0.5% Waste electric motors, wires and cables, metal and appliance scrap, smelt slag
- 0.3% Automobile scrap.

Australia's exported 1.25 million tonnes of recyclables to China in 2016-17, of which 203,000 tonnes was metals¹. National Sword has constricted this flow and disrupted the global market for recyclable material, with countries following China's lead including Thailand, Vietnam and Malaysia.

Global non-ferrous markets have been particularly hard hit, with high purity material essential to bolster sales. There are no regularly published figures on Australian export of scrap metal, but proxy figures for non-ferrous metal from the Institute of Scrap Recycling Industries indicate US exports of copper and copper alloy scrap to mainland China during January to July 2018 were down 41 per cent compared to the same period in 2017. Aluminium scrap fell 26 per cent in the same period².

This unforeseen tightening of export restrictions is driving global investment in advanced separation equipment and is the key driver for the Modification Proposal. Sell and Parker currently hold license number A036040008 issued by the AQSIQ agency of the Chinese Government, allowing the export of scrap metal to China. To continue exporting to China, Sell and Parker must install plant with the capability to meet the new contamination requirements.

Sell and Parker propose to install proprietary sorting equipment that would have the capability to process scrap metal to less than 1% contamination as prescribed by the

¹ Data on exports of recyclables from Australia to China, 2018, Blue Environment for the Australian Government

² http://www.recyclingtoday.com/article/state-of-scrap-trade/

China National Sword policy. This plant is to be located in the metal annexe in the North-West corner of the Site. In its current configuration this annex is not tall enough to house the required plant. The Modification Proposal will raise the height of this structure to be in line with the adjacent structures, enabling the plant to be brought on Site.

3.3 Site optimisation

The project as approved under SSD 5041 (and subsequent modifications 1 and 2) is currently in the final stages of construction. During the construction period further opportunities to optimise site layout and processes to improve safety, environmental performance and site efficiency have been identified.

Safety would be improved on the Site through signage upgrades and the construction of new office and amenities on the western side of the yard and within buildings A and B. The current site layout requires staff to cross the active site to access amenities. The construction of new office and amenities within buildings A and B would remove this requirement and improve site safety and efficiency. Signage upgrades at site entrances would provide clear direction for wayfinding and would minimise heavy vehicle, light vehicle and pedestrian conflicts.

To further improve visual amenity and the Tattersall Road streetscape fencing, upgrades have been proposed that would integrate the upgraded facility to the surrounding industrial area.

Site efficiency would be improved through the realignment of the conveyor and relocation of the hand unload operations to allow better flow of vehicles through the Site and a reduction in conflicting activities.

It is proposed to modify operational hours as approved under SSD 5041 to allow cleaning and maintenance activities to occur outside of the currently approved hours. This would enable the Site to maximise resource recovery tasks during the approved operational hours and undertake administrative activities outside of these hours. The Site would not open to the public (nor would resource recovery processing be undertaken) during these hours.

3.4 Expansion of processing capabilities and safety

The conversion of the shear is to enable the processing of pre-tensioned and prestressed materials. 20-30 years ago, there was a shift in concrete construction techniques to utilise pre-tensioned cables. This enabled a reduction in the size and weight of structural concrete elements without compromising strength. Many of the buildings around Sydney that were initially constructed using these techniques are now being demolished (for example the Sydney Football Stadium and many CBD buildings).

There is, therefore, an associated increase in the volume of pre-stressed and pretensioned metal waste being generated. This material is both difficult and dangerous to recycle. It presents a significant safety hazard due to the stored potential energy in the material, meaning it springs open when cut. There has been a fatality in Western Australia resulting from the manual cutting of these products. The difficulty in processing comes from the fact that the material needs to be shredded, however prior to shredding it must be unballed and reduced to short lengths to prevent damage to the shredder and safety hazard to employees.

The appropriate tool for pre-processing of this material is a mechanical shear, however the process potentially exposes the machine to catastrophic side loading as the tension in the cables is released. Accordingly, the shear needs to be modified and operated specifically to enable cable shearing. Sell and Parker intend to operate the shear for cable and wire products (e.g. fencing, mattress springs) which present

similar issues. Post processing, light gauge materials (wire / bed springs) products of the modified shear are fed into the shredder for final processing. Heavier gauge materials (cable & reinforcing steel) go directly to the mill..

3.5 Alignment with waste policy

The following is a list of relevant policies that are in place to guide waste management practices for the proposal:

- China National Sword Policy
- NSW Waste Avoidance and Resource Recovery Strategy 2014-21
- National Waste Policy: Less Waste, More Resources
- Western Sydney Regional Waste Avoidance and Resource Recovery Strategy 2017 – 2021
- NSW draft Circular Economy policy

Relevant waste policy has been considered throughout the planning and approval process to ensure the objectives of the Project and Modification Proposal align to the strategic vision for waste and recycling within NSW and Australia. The Modification Proposal does not alter the consistency of the Project with these policies and would continue to align with their intentions. The Site is zoned as IN1 General Industrial, and the Modification Proposal will be consistent with this zoning. There will be no change to the quantity of waste to be processed, or to the types of material that are processed on site.

4 MODIFICATION PROPOSAL DESCRIPTION

The purpose of this Modification Proposal is to improve the operational efficiency, including improving safety and environmental performance of the Site. The modifications are required to respond to market and policy changes in the waste recycling industry. Approval is sought for this modification to SSD 5041 under Section 4.55 (1A) of the EP&A Act. A description of the modifications for which approval is sought is provided below.

4.1 Overview

A summary of the works included within the Modification Proposal are as follows:

- · Metal awning and processing equipment
 - Increase in height and enclosing of the Metal awning and installation of metal processing equipment
- Fencing and signage
 - Extension of existing fencing along the Tattersall Road frontage and at entrances to the Site
 - Installation of directional signage at the entrances to the Site
- · Building A and Building B offices
 - Installation of additional elevated offices and amenities (within the buildings)
- Amenities (western boundary)
 - Installation of amenities within yard area (to the north of Building D)
- Existing shear conversion
 - Existing shear to remain in the current location and converted into a machine capable of processing high tensile/pre-stressed metal.
- Pre-shredder relocation
 - Relocation of the pre-shredder from the approved location further south west, to the area identified as the 'hand unload area'
 - Relocation of 'hand unload' operations to Building B.
- Conveyor minor realignment
 - Minor realignment of the conveyor to follow the building line (on the roof) of Building C.
- · Extension of hours
 - Operational hours (no public access or resource recovery processing) would be extended to allow cleaning and maintenance activities from 9pm to 6am Monday – Saturday and 24 hours on Sunday.
- Administrative changes

Engineering Drawings providing further details on the Modification Proposal are provided in Appendix B.

The Modification Proposal does not propose any alteration to the approved throughput of 350,000 tonnes per annum or the operating hours approved in SSD 5041 for the metal recovery, processing and recycling facility.

4.2 Built form

An outline of the built form alterations that are proposed to approved buildings and infrastructure on the Site, is provided within Table 2.

Table 2 Built form alterations included within the Modification Proposal

Item	Description
Metal awning	Alteration of the existing metal awning fronting Tattersall Road to accommodate metal processing plant, including:
	 Increase in height of the structure from 8m to 16m above site ground level to tie in with adjacent Building L
	 Installation of non-ferrous shredder residue sorting plant (contained within the awning structure)
	Proposal metal awning to be steel framed with colorbond cladding (or similar materials)
Fencing	The existing chain link fence (and mesh for dust cover) along the Tattersall Road frontage would be replaced with a colorbond (or equivalent) barrier to provide shielding (visual, dust and noise) of the metal recovery, processing and recycling activities. This fence would be constructed to integrate with the recently constructed covering of the Building L and the proposed alteration to the Metal awning (see above).
	The fence would be located above the existing acoustic wall (Hebel blocks) and be at a maximum height of 10m (consistent with the height of the western boundary fence and Building L. This would be approximately 3m higher than the existing chain link and shade cloth extension on top of the existing Hebel block wall, to assist in noise attenuation and mitigating dust migration off site.
	In addition to the Tattersall Road frontage, this fence would be replaced (for a distance of approximately 55m) along the western side of the entrance central entrance to the Site.
Signage	Directional signage is proposed to be installed at the entrances to the Site to improve safety, in particular minimising traffic conflicts between heavy and light vehicles. The details of these signs, which would be installed on the Tattersall Road frontage, are as follows:
	 Primary heavy vehicle entrance (west) – 2.4m in length and 3.6m in height.
	• Light vehicle entrance (central) – 2.4m in length and 3.6m in height.
	Vehicle exit (east) – 2.4m in length and 3.6m in height.
	Signs would be static in nature and flood light. They are not proposed to be illuminated (back light).
	Further detail and the location of each of these signs is provided in the Signage Plan at Appendix B.
Building A and Building B offices	Alterations to the interior of existing warehouse structures with the addition of elevated office spaces within the warehouses. The use of these areas would be ancillary to the warehouse use. These alterations include:
	Erection of offices and amenities buildings within the warehouse areas of Buildings A and B
	 Offices would be erected above existing offices and amenities structures.
	 An addition of 200m² and 150m² of commercial floor space would be added to Buildings A and B respectively

Item	Description
Rem	These offices would not be able to be viewed from public areas, with the exception of obscured views when roller doors are up, which is only during operating hours.
Elevated lunch room and toilet block	Addition of an elevated lunch room and toilet block on the central western part of the Site, north of Building D. The use of these areas would be ancillary to the warehouse use. This addition will include:
	Erection of a structure to house the lunch room and toilet block
	Supporting structures to be comprised of structural steel framing.
Existing shear conversion	Conversion of the existing metal shear into machinery that can safely process high tensile and pre-stressed metal. This conversion would involve:
	Partial deconstruction of the existing shear
	 Removal of redundant parts of the existing shear and delivery of upgraded components
	 Conversion of the old Lindemann shear to enable the processing of pre-tensioned and pre-stressed steel.
	The upgraded machinery would retain the existing maximum height and building envelope of the existing shear.
Pre-shredder relocation	Relocation of the approved pre-shredder approximately 70 m to the south-west of the approved location (as per the engineering plans in Appendix B). This work would involve:
	Clearing of scrap metal from current hand unload stockpile area
	 Relocation of the 'hand unload' operations to Building B (no physical works are required for this activity)
	 Removal of the existing pre-shredder and installation of a new fabrication at the proposed location
	Relocation of existing power pack and controls to the proposed location
Conveyor minor realignment	The alignment of the approved overhead conveyor (transporting Floc from Building L to Building C) would be altered to follow the building line (on the roof) of Building C.
	This realignment will enable the installation of a fully enclosed conveyor which will minimise dust and noise. The nature of the conveyor means that there cannot be any bends in the lengths of belt.
	The conveyor would only be altered at the location of Building C to enable a more direct route to be achieved.
Fire infrastructure	New fire infrastructure would be installed to assist the Site in meeting the requirements of the fire order. New infrastructure would include the provision of pipes, tanks, hydrants and water cannons in accordance with the fire design in Appendix C.

4.3 Construction

The works proposed in the Modification Proposal are minor in nature. As a result, the construction works are minor, and the duration would be relatively short. An outline of the key construction activities is provided in Table 3. It is anticipated that some of these details may change during the course of undertaking the construction and therefore they have been provided as indicative at this stage.

Of key importance is that certain aspects of site operations would be ramped down while construction activities are undertaken, e.g. the shear would be offline when it is being upgraded. Therefore, there would a reduction in operational activities which would counteract the construction activities. Generally, construction activities would not considerably depart from those approved within SSD 5041.

Table 3 Construction activities overview

Construction	Indicative description	
element		
Activities	The key construction activities include the following:	
	Construction of metal awning	
	Assembly of the processing equipment	
	 Removal of existing chain link fence (and dust cover) and erection of proposed fencing 	
	Erection of signs along the Tattersall Road frontage	
	Construction of offices and amenities within buildings (Building A and B) and externally (north of Building D) (either on-site or pre-fabricated)	
	 Part dismantling of the existing sheer and installation of upgraded components 	
	 Dismantling of existing pre-shredder and assembly at proposed location (including installation of replacement components) 	
	Construction of altered section of the conveyor.	
Program	Works would be undertaken progressively over a period of approximately 3-12 months. Notwithstanding this, some aspects of the works may be delayed, subject to receipt of machinery and materials.	
Workforce	The majority of construction activities would be undertaken by on-site personnel. In some instances, some contractors may be required. Approximately 5 additional temporary contractors (above the previous approval) are anticipated to be required over the duration of the construction works.	
Hours	Construction works would be undertaken during construction hours, as described within condition B31 of SSD 5041.	
Plant and equipment	Generally existing active on-site plant and equipment would be utilised for the construction works. Generally, equipment would include mobile cranes, forklifts, welders and hand tools.	
Traffic movements	No additional traffic movements would be evident as a result of these activities, all movements would be accommodated within previously approved construction movements.	
	Contractors and importation of material would utilise existing site entrances from Tattersall Road.	
Ancillary facilities	Any laydown areas for materials would be accommodated adjacent to the works being undertaken within the Site.	
Construction Environmental Management Plan (CEMP)	The previously prepared CEMP and, as relevant, subplans identified in condition of approval C1 of the SSD 5041 Approval would be considered suitable to accommodate the works without update. All works would be undertaken, and environmental mitigation measures implement in accordance with the CEMP.	

4.4 Operation

The Modification Proposal includes only small-scale operational changes to the operations approved under SSD 5041, including:

- Operation of modified processing equipment within the upgraded metal awning area
- Activities within the newly constructed offices and amenities
- Operation of the upgraded shear including processing of high tensile / pre stressed materials.
- Operation of the relocated pre-shredder
- Operation of the realigned conveyor
- Extension of operational hours.

The nature and scale of operations would generally be consistent with those presented in SSD 5041.

The extension of operational hours would allow for cleaning and maintenance activities to be undertaken outside of the hours approved with SSD5041. Cleaning activities would consist of hosing and washing down of equipment. Maintenance activities would consist of repair and maintenance of equipment including but not limited to the shredder, shear and processing machinery. The proposed extension to operational hours is shown in Table 4.

Table 4 Approved and proposed operating hours

Activity	Day	Hours
Cleaning and maintenance	Mon – Sat	9pm – 6am
	Sun	24 hours

The Modification Proposal would not impact upon the overall operations of the Site including throughput of waste, operational workforce or traffic movements. For clarity an overview of the waste streams to be processed by the key machinery is identified in Section 4.4.1.

The previously prepared Operational Environmental Management Strategy (OEMS) and, as relevant, subplans identified in condition of approval C3 of the SSD 5041 approval are considered suitable to accommodate the operational activities within the Modification Proposal without update. All operational activities would be undertaken, and environmental mitigation measures implement in accordance with the CEMP.

An assessment of the potential impacts of the operational components of the modification proposal is presented in Section 6.

4.4.1 Waste streams

The Modification Proposal would not increase the throughput of waste through the facility nor would it alter the types of waste received at or within the Site.

An outline of the waste to be processed by the equipment proposed to be altered or installed as part of the Modification Proposal is provided within Table 5.

Table 5 Overview of waste processing activities

Operational element	Description of waste processed
Metal Awning (non- ferrous shredder residue sorting plant)	91% clean product to be subject to additional sorting to remove contamination and clean waste to the standard prescribed by the China National Sword policy (see Section 3.2)
	Pre-tensioned and pre-stressed products including (but not limited to):
Existing shear conversion	Pre-tensioned and pre-stressed cables
	• Fencing
	• Springs
Pre-shredder	All cars and bales will be processed by the pre-shredder before passing to the shredder mill.
Conveyor	The conveyor is fully enclosed and will transport floc from the shredder to the floc processing building (Building C)

4.5 Administrative changes

Through consultation with EPA it was determined that discharge of water to Breakfast Creek from the Site would generally not be acceptable and any required discharge would need to be discussed and undertaken through a trade waste agreement with Sydney Water.

As a result of this change the conditions of approval, requiring the monitoring of discharge to breakfast creek is considered unnecessary (as discharge would not be required). Consequently, this Modification Proposal proposes to modify relevant conditions of approval to remove this requirement. The conditions to be modified have been discussed in Section 4.6.

This change is administrative only and would not result in a change to impacts from the construction or operation of the project.

4.6 Amendment to approval instrument

A modification to the SSD 5041 approval is sought to permit the proposed alterations and additions outlined in Section 4 of this Modification Report. The proposed alterations in Section 4 require an amendment to the SSD 5041 conditions of approval, which are identified below. Words proposed to be inserted are shown in <u>underlined bold italics</u>. Words proposed to be removed are shown in <u>bold italics</u> strikeout.

A2. The Applicant shall carry out the Development in accordance with the:

- a) EIS prepared by ERM dated July 2014;
- b) Response to Submissions report prepared by ERM dated 7 January 2015;
- c) Supplementary Response to Submissions prepared by Mecone dated 30 June 2015;
- d) Supplementary Response to Submissions prepared by Sell and Parker Pty Ltd dated 3 September 2015;
- e) Site layout plans and drawings (See Appendix A);
- f) Management and Mitigation Measures (see Appendix B);
- g) Modification Application SSD 5041 MOD 1 and accompanying document titled Statement of Environmental Effects 23-43 and 45 Tattersall Road, Kings Park dated August 2016 prepared by Higgins Planning, additional information from Higgins Planning dated 22 December 2016 and further additional information from Allens and Linklaters dated 9 February 2017; and
- h) Modification Application SSD 5041 MOD 2 and accompanying document titled Statement of Environmental Effects 23-43 and 45 Tattersall Road, Kings Park dated December 2017 prepared by Higgins Planning.
- i) Modification Application SSD 5041 MOD 3 and accompanying document titled Section 4.55(1A) Application (SSD 5041 Mod 3), 23-43 and 45

 Tattersall Road, Kings Park dated December 2018 prepared by Arcadis Australia Pacific Pty Ltd.

B6. The Applicant shall operate a Water Management System for the site. The system must:

- a) be designed by a suitably qualified and experienced person(s) in consultation with the EPA;
- b) include a treatment system with primary, secondary and tertiary treatment components;
- c) be consistent with the guidance in *Managing Urban Stormwater Soils and Construction Vol. 1* (Landcom, 2004);
- d) divert clean surface water around operational areas of the site;
- e) include water quality monitoring that can determine the performance of the water management system against the EPL discharge limits;
- f) include water reuse based on a risk assessment of environment and human health impacts; and
- g) be commissioned in accordance with Condition B7.

B7. The Applicant shall commission the Water Management System prior to discharging any water from the site. The commissioning must:

- a) be completed within 2 years from the date of this consent, or within such other time agreed in writing by the Secretary;
- b) be undertaken by a suitability qualified and experienced person(s) in consultation with the EPA;
- c) include a program for acquiring baseline data of receiving waters and the establishment of site specific stormwater discharge criteria in the EPL;
- d) including testing of the performance of all components of the Water Management System, including the primary, secondary, and tertiary treatment systems;

e) identify and implement changes to the Water Management System that may be necessary to achieve compliance with the discharge criteria in the EPL; and

f) include off-site trials of treatment technologies if necessary.

B31. The Applicant shall comply with the construction and operation hours in Table 3 unless otherwise agreed to in writing by the Secretary.

Table 3: Hours of Construction and Operation

Activity		Day	Hours
		Monday – Friday	7 am to 6 pm
Construction		Saturday	8 am to 1 pm
		Sunday & Public Holidays	Nil
	Оху-	Monday – Saturday	9 am to 3 pm
	acetylene torch cutting	Sunday & Public Holidays	Nil
Operation	Maintenance	Monday – Saturday	9 pm – 6 am
	and Cleaning	Sunda <u>y</u>	24 hours
	All other	Monday – Saturday	6 am – 9 pm
	activities	Sunday & Public Holidays	Nil

5 PLANNING ASSESSMENT

5.1 Statutory planning assessment

5.1.1 Relevant legislation

A summary of the Commonwealth, State and Local Government legislation which are relevant to the Proposal are summarised in Table 6.

Table 6 Legislation applicable to the Modification Proposal

Legislation	Associated environmental concerns	Approval or assessment requirement
Commonwealth	1	
Environment Protection and Biodiversity Conservation Act 1999	Impacts to Matters of National Environmental Significance (MNES), particularly disturbance to listed threatened species,	The ecological assessment prepared as part of the EIS for the Original Approval identified that the proposal is unlikely to impact on threatened species, populations or ecological communities and their habitats.
(EPBC Act)	ecological communities and/or migratory species, and impact(s) on Commonwealth land.	Given the minor nature of the Modification Proposal and that it would be contained within the existing project site the Modification Proposal would not result in a change to the impacts as presented in The Original Approval.
State		
EP&A Act	Planning approval	The Original Approval (SSD 5041) for the
EP&A Regulation	pathway determination and any potential impacts on the environment	expansion and reconfiguration of the Kings Park Metal Recycling Facility was granted on 12 November 2015 by the Department of
State Environmental		Planning and Environment (DPE).
Planning Policy (Infrastructure) 2007		Modification to The Original Approval is sought under s 4.55(1A) of the EP&A Act. The modification Proposal is considered 'substantially the same development' as defined under s4.55(1A) of the EP&A Act.
State and Regional Development SEPP		Assessment against Section 4.55(1A) of the EP&A Act is detailed in Section 5.1.2.

Legislation	Associated environmental concerns	Approval or assessment requirement
Protection of the Environment Operations Act 1997 (POEO	Impacts of the operation of the Proposal relating to air quality, noise emissions and discharge of polluted water.	An Environmental Protection License (EPL number 11555) was issued for the premises 23-43 and 45 Tattersall Road on the 16 th of April 2002 under Section 55 of the <i>Protection of the Environment Operations Act 1997.</i>
Act)		The EPL allows metallurgical activities to take place on site as a scheduled activity up to 500,000 tonnes per annum. The modification proposal does not propose a change to throughput.
		As there will be no alteration to the scheduled activity occurring on site, no amendment to the EPL is required.
Contaminated Land Management Act 1997 (CLM Act) State Environmental	Disturbance of contaminated land and potential for further soil contamination	The EIS for the Original Approval included a Phase 1 Environmental Site Assessment (ESA) for the Site. Assessment of the contamination potential of the Modification Proposal concluded that there would be no additional impacts to those identified in the EIS.
Planning Policy No. 55- Remediation of Land (SEPP 55)		Potential impacts will be managed in accordance with the existing Construction and Operation Environment Management Plans for the Project.
National Parks and Wildlife Act 1974 (NPW Act)	Disturbance of any objects or places of Aboriginal heritage significance	Under Section 4.41 of the EP&A Act development applications assessed as SSD do not require an Aboriginal heritage impact permit (AHIP) (under section 90 of the NPW Act).
		The EIS for the Original Approval included an Aboriginal Heritage Impact Assessment for the Site. The assessment identified no known objects or places of Aboriginal heritage significance within the boundaries of the Site.
		The assessment concluded that given the Site is already highly disturbed it is highly unlikely that objects or places of Aboriginal heritage significance will be impacted by the original development, and this is still the case for the Modification Proposal.
Biodiversity Act (2016)	Disturbance to listed threatened species and ecological communities	The EIS for the Original Approval included an Ecological Impact Assessment for the Site and surrounds. As the Site would not require vegetation clearance, the Modification Proposal would not result in a change to the impact assessment as presented in the EIS for the Original Approval.

Legislation	Associated environmental concerns	Approval or assessment requirement
Noxious Weeds Act 1993 (NW Act)	Spread and impact of weeds	The Site is unvegetated and it is not anticipated that the Modification Proposal would have any effect on the spread or impact of weeds.
Fisheries Management Act 1994 (FM Act)	Disturbance to aquatic flora and fauna	The Modification Proposal would not result in any disturbance to aquatic flora and fauna.
Water Act 1912 (Water Act) Water	Disturbance of groundwater aquifers, impacts to flooding behaviour and/or water	Under Section 4.41 of the EP&A Act, development applications assessed as SSD do not require a permit under section 89, 90 or 91 of the WM Act.
Management Act 2000 (WM Act)	quality of surrounding water bodies	The Site backs on to Breakfast Creek, a highly modified and heavily vegetated creek. The Modification Proposal would not result in any additional impacts to Breakfast Creek beyond those addressed in the EIS for the Original Approval.
Roads Act 1993 (Roads Act)	Impacts of the construction and/or operation of the Proposal on traffic flows and works to public and private roads.	The Modification Proposal would not result in any disturbance to traffic flows on the surrounding roads or on site.
Heritage Act 1977 (Heritage Act)	Disturbance to any object that is of state or local heritage significance	Under Section 4.41 of the EP&A Act, development applications assessed as SSD do not require a permit under section 139 of the Heritage Act. The EIS for the Original Approval included a Historical Heritage Assessment for the impacts of the Project. The assessment identified that it was highly unlikely that the project would impact on heritage values.
		The Modification Proposal would not result in any additional impacts to items of Non-Aboriginal heritage, beyond those approved in the EIS.

Legislation	Associated environmental concerns	Approval or assessment requirement
Waste Avoidance and Resource Recovery Act 2001 (WARR	Waste management and potential opportunities for diversion of waste from landfill	A waste and resource management assessment was undertaken in the EIS for the original approval. The Modification Proposal does not include major demolition works or vegetation clearance.
Act) Protection of the Environment Operations (Waste) regulation 2005		The Modification Proposal would not result in a change to the waste and resource impacts as presented in the EIS for the Original Approval.
Rural Fires Act 1997 (Rural Fires Act)	Bushfire management/prevention and ensuring the site is suitably protected from	Under Section 4.41 of the EP&A Act development applications assessed as SSD do not require a bush fire safety authority (under section 100B of the Rural Fires Act).
	the threat of bushfires	An assessment of the Project against the relevant factors for bushfire risk was presented in the EIS for the Original Approval. The proposed development would not impede the protection of any nearby buildings and infrastructure from bushfire. The Modification Proposal would not result in changes to the assessment as presented in the EIS.
State Environmental Planning	Management of hazardous and dangerous goods	A Hazard and Risks Assessment was prepared for the Project as part of the EIS for the Original Approval.
Policy No. 33- Hazardous and Offensive Development (SEPP 33)		The Modification Proposal would not result in a change to the approved land use for the Site and is consistent with the hazards and risks considered in the EIS for the Original Approval.
State Environmental Planning Policy No. 64-	Location and design of signage and impact on the surrounding visual environment	As part of the Modification Proposal, new directional signage is proposed along the Site boundary with Tattersall Road and the fence fronting Tattersall Road is to be extended.
Advertising and Signage (SEPP 64)		An assessment of the visual impacts of the Modification Proposal is included in Section 6.5 below. Signage would be in keeping with the area and would not result in a significant impact on the surrounding visual environment.
Local		
Blacktown Local Environment Plan 2015	Impact on the environment and the built form of the Blacktown Local Government Area	The EIS for the Original Approval included consideration of matters within the Blacktown LEP. The external configuration of the approved development and site layout will not be altered by this application, and as such no
(Blacktown LEP)		25 diction by the appropriation, and as such no

Legislation	Associated environmental concerns	Approval or assessment requirement
		new assessment matters are triggered under the BLEP 2015.
Blacktown Development Control Plan 2008 (Blacktown DCP)	Impact on the environment and the built form of the Blacktown Local Government Area	The EIS for the Original Approval included consideration of the Blacktown DCP. As the project is SSD under Part 4, Division 4.1 of the EP&A Act, consideration of the Blacktown DCP is not required.

5.1.2 Environmental Planning and Assessment Act 1979

Section 4.55(1A) of the EP&A Act allows a consent authority to modify a development consent subject to a number of conditions. In determining an application for modification under Section 4.55, the consent authority must also take into consideration matters referred to in Section 4.15 of the EPA Act. An assessment of the permissibility of the modification against the requirements of the EP&A Act as described above is presented in Table 7.

Table 7 Assessment of the Modification against the requirements of the EP&A Act

Clause	Requirement	Applicability to the Modification Proposal
4.55 1(A)		
(a)	it is satisfied that the proposed modification is of minimal environmental impact	An assessment of the impacts of the Modification Proposal is presented in Section 6. The assessment identified that the Modification Proposal would not result in more than a minimal environmental impact.
(b)	it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all),	The nature of the proposed modifications to SSD 5041 will result in a development that is substantially the same to that approved under SSD 5041 and any subsequent modifications. The modifications are considered to be minor in nature and will not alter the quantity or type of waste that is to be processed by the facility.
(c)	 it has notified the application in accordance with: the regulations, if the regulations require a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising 	At the conclusion of a notification period, the DP&E is required to consider any submissions received in accordance with this section. It is understood that DP&E will consider any planning issues raised in submissions as part of the assessment of the application

Clause	Requirement	Applicability to the Modification Proposal
	of applications for modification of a development consent.	
(d)	it has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the development control plan, as the case may be	A discussion of consultation with relevant stakeholders is provided in Section 1.3
4.15 (1)		
(a)	The provision of:	-
(i)	any environmental planning instrument, and	
(ii)	any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	Consideration of the Modification Proposal against environmental planning instruments is provided in Section 5.1.1.
(iii)	any development control plan, and	-
(iiii)	any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	The Site is not subject to any voluntary planning agreements
(iv)	the regulations	The regulations have been considered within the environmental assessment as required.
(b)	the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	The likely impacts of the Modification Proposal have been detailed in Section 6.
(c)	the suitability of the site for the development	The Site is considered suitable for the proposed development as it is located on land zoned IN1 General Industrial which permits the metal recycling processing plant and its expansion and associated ancillary development. There are no environmental constraints preclude the proposed modification.
(d)	any submissions made in accordance with this Act or the regulations	DP&E will consider any planning issues raised in submissions as

Clause	Requirement	Applicability to the Modification Proposal
		part of the assessment of the application,
(e)	the public interest	The Modification Proposal is considered to be in the public interest as it supports the ongoing and effective management of waste in NSW.

In summary, the Modification Proposal would result in a minor impact (air and noise) and therefore assessment is considered suitable under Section 4.55(1A) of the EP&A Act.

5.1.3 State Environmental Planning Policy 64-Advertising and Signage

State Environmental Planning Policy No. 64 - Advertising and Signage (SEPP 64) aims to ensure that signage is compatible with its surroundings, provides effective communication and is of high quality design. Clause 8 states that a consent authority must not grant consent to a DA unless it is consistent with the objectives and assessment criteria provided in this SEPP.

The Proposal includes signage which would be visible from a public area, Tattersall Road, and therefore is subject to approval under SEPP 64 (refer to Section 4 this Modification). Overall, the Proposal is considered consistent with the objectives of SEPP 64 (Clause 3) in that, the signage would be compatible with the surrounding area, provides suitable communication for wayfinding and would be of high design quality. An assessment of the Proposal having regard to the assessment criteria provided in this SEPP (Schedule 1) is provided in Table 8. An overview of the signage sizes and locations is shown on the engineering plans in Appendix B.

Table 8 SEPP 64 (Schedule 1) assessment

Consideration	Compliance
Character of the area	The surrounding area does not have a desired future character, however the signage included in the Proposal has been designed to integrate into the surrounding area with the assistance of landscaping and also a discrete selection of materials and finishes.
Special areas	The signage has been designed to ensure that it would not detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas.
Views and vistas	The proposed signage would not impact on any existing views or dominate the skyline in the area. Signage would be below building height and would not be visible from receivers away from Tattersall Road. The signage has been designed to integrate into the surrounding area as a result of landscaping and suitable materials and finishes.
Streetscape, setting or landscape	The signage has been designed to create visual interest and be of appropriate scale and design for the Tattersall Road streetscape.

Consideration	Compliance
Site and building	The signage has been designed to be of a scale that is reflective and consistent with the proposed buildings (administration facility and warehousing) and structures (containers) located on the Site. The signage will not detract from this building or infrastructure.
Associated devices and logos with advertisements and advertising structures	Signage proposed includes way finding signs which have been designed to improve access to and within the Site. This signage has been located in highly visual areas (locally) to improve safety and maximise efficiency.
Illumination	Signs would be static in nature and flood light. They are not proposed to be illuminated (back light). The signs have been located in areas that are not visually prominent outside of the Tattersall Road minimise light spill and impact on surrounding land uses.
Safety	Overall the signage proposed has been designed to improve access to the Site and vehicle movement within the Proposal's operational area thereby improving safety of vehicle and pedestrian movements.

6 ENVIRONMENTAL ASSESSMENT

6.1 Air quality and odour

An assessment of air quality and odour impacts has been prepared by ERM (Appendix D) to consider additional potential air quality and odour impacts of the proposed modification.

6.1.1 Previous assessments

An assessment of air quality and odour impacts was undertaken by ERM within the EIS to support the SSD Application. The assessment found that:

- The highest predicted annual average concentrations for Total Suspended Particulates (TSP) dust deposition and annual average PM₁₀ concentrations at each of the receptors is below assessment criteria.
- The maximum predicted 24-hour average PM₁₀ concentration together with the
 maximum background concentration results in levels that exceed the assessment
 criteria at the sensitive receptors due to the elevated background ambient air
 quality concentrations in the area.
- The peak odour concentration at the receptors is below assessment criterion.
- The highest annual average and 1-hour average NO2 concentrations at the receptors are below the respective assessment criteria
- The toxic air pollutants concentrations are found not to exceed the Work Safe 10hour adjusted TWA at offsite locations within the industrial estates where the Site is located and found no to exceed the human health assessment criteria at the nearest sensitive receptors.

Further consideration was given to air quality impacts within the Statement of Environmental Effects' for Modification 1 and Modification 2. These assessments found that the proposed modifications for both Modification 1 and Modification 2 would not result in changes to the air quality outcomes identified in the original project approval.

6.1.2 Impact assessment

The Assessment of Air Quality Impacts assesses impacts associated with the Modification Proposal, both incrementally and cumulatively with approved facility.

Methodology

A qualitative assessment of potential air quality impacts from construction activities has been undertaken. The assessment identified activities that are likely to result in emissions and qualitatively assessed their potential impact in consideration of the impacts identified within the Air Quality Impact Assessment (AQIA) undertaken as part of the EIS for the Original Approval (2015 AQIA).

To assess the potential operational air quality impacts of the Modification Proposal a semi-quantitative assessment has been undertaken. Based on the proposed modifications, there is potential for a change in emissions to ambient air quality as a result of changes to the location and / or emission rates from:

- · Addition of proposed metals processing equipment in the metal awning area
- Existing shear conversion

- Pre-shredder relocation
- Conveyor realignment.

The relevant emission types that are considered to have the potential to be affected by the modifications relate to particulate matter, i.e. total suspended solids (TSP) and particulate matter with aerodynamic diameter of 10 microns or less (PM10).

The 2015 AQIA found that TSP and dust deposition cumulative impacts (incremental from the Site plus the background levels, where they were known) were well below their respective criteria.

PM10 cumulative concentrations in the 2015 AQIA were found to have potential for exceedances at certain nearby sensitive receptors for the short-term averaging period of 24 hours, whilst the concentrations for the annual period were below the criterion.

As TSP and dust deposition were significantly below criteria it was determined that the proposed modifications are unlikely result in changes to emissions that would result in emissions levels above criteria. As such, the air quality assessment for the proposed modifications has focused on PM_{10} for the 24-hour averaging period, as the emissions type that has the potential to result in exceedances from the proposed modifications.

Construction

When assessing the potential air quality impacts from construction of the modification the following aspects were considered:

- Some construction activities take place within buildings which would minimise any emissions to the ambient environment;
- To accommodate modifications, some site operations would need to be scaled down while construction activities are being undertaken. E.g. the shear would need to be offline when it is being upgraded. Consequently, there would be a reduction in operational activities and emissions which may in part offset the emissions generated by construction activities;
- No additional laydown areas or bulk earthworks are required for the modification;
- A CEMP is in place to manage potential impacts from construction.

Based on the small scale of the works and the considerations above, the construction activities associated with the proposed modifications are unlikely to result in additional air quality impacts. No further mitigation measures are considered necessary.

Operation

Based on the activities proposed as part of the Modification Proposal there is potential for a change in contribution to ambient air quality as a result of changes to the location and / or emission rates from the following elements:

- Modified metals processing equipment in the metal awning area
- Existing shear conversion
- Change in the pre-shredder relocation
- Conveyor realignment.

The 2015 AQIA identified that the primary emissions that have the potential to exceed criteria when considering background levels plus incremental contributions from the is PM_{10} for the 24-hour averaging period. As such, this assessment has looked at the potential for changes to the emissions relating to PM_{10} for the 24-hour averaging period from the proposed modification.

Metal processing equipment

The metal processing equipment in the metal awning area is an eddy currents and sensor sorter. There are no cutting and compaction activities involved. As such, there are no associated air emissions or air quality impacts due to this processing equipment.

Shear modifications

The existing shear will remain in the current location as indicated in Appendix B, however the machinery will be converted to enable processing of high tensile/prestressed metal. The actual composition and volume of the materials processed will not differ from what was previously assessed in the 2015 AQIA. As the tensile wires are smaller than heavy steels, actual volumes may actually be slightly diminished from that previously assessed.

In the 2015 AQIA the activities associated with shear operation (transfer of large items to the shear, the shearing process and loading of shear product onto truck for transport off-site) were excluded from dispersion modelling as they were considered to be activities that would generate few emissions of particulate matter.

As such, there would be no material difference to the air quality impacts arising from the shear modifications. No further mitigation measures are considered necessary.

Pre-shredder modification

The relocation of the pre-shredder will entail moving the pre-shredder as well as associated activities that have the potential to generate air quality emissions.

An analysis of the modelling developed for the 2015 AQIA was undertaken to identify the contribution of pre-shredder activities to the total PM_{10} emissions concentrations. It was identified that at the most affected receptor, the maximum modelled contribution to total PM_{10} from pre-shredder activities was 11%.

Given the pre-shredder is to be moved 70 metres to the south, there is likely to be a reduction in concentration at the receptors to the north of the Site (R12/R13/R20) and a slight increase in concentration at receptors to the south-west of the Site (R17/R18/R19). If it is conservatively assumed that the increase at receptors R17/R18/R19, as a result of the movement of the pre-shredder, is equal to its percentage contribution of the Site emissions (11%), the resultant concentration would remain below the air quality standard. This is due to the results from the 2015 ERM assessment at R17/R18/R19 being sufficiently below the adopted assessment standard. It is considered likely that the change in impact at this location will be less than 11%. No further mitigation measures are considered necessary.

Conveyor realignment

The realignment of the conveyor to a more direct route between Building L and Building C will affect the location of the transfer points at the conveyor bends. At the nearest worst-case sensitive receptor to the Site as assessed in the 2015 AQIA (R20), emissions from conveyor transfer points as above account for approximately 1% of the total predicted incremental impact at that sensitive receptor. Based on this low percentage and the realignment of the conveyor transfer points further away from the Site boundary, it is likely that there may be some reduction in incremental ground level concentrations on modelled receptors but the magnitude of change is not anticipated to be significant due to the minor contribution of the conveyor transfer points to overall Site emissions. No further mitigation measures are considered necessary.

6.1.3 Mitigation measures

As the Modification Proposal would not result in a significant change to the impact as presented within the original approval, no further mitigation measures relating to air quality would be required.

6.2 Noise and vibration

An assessment of noise and vibration impacts has been prepared by Renzo Tonin included at Appendix E to consider additional potential noise and vibration impacts of the proposed modification.

6.2.1 Previous assessments

Renzo Tonin & Associates (2014) undertook an assessment of noise and vibration impacts to support the SSD Application. The EIS assessment found that noise levels from the project at residential premises were predicted to comply with the project specific noise levels without mitigation measures. Noise levels at existing and proposed new industrial premises also complied with the project-specific noise levels once the noise and vibration measures were implemented. Potential traffic noise associated with the operation of the facility was assessed as having an insignificant impact on nearby residential receivers and complies with the RNP.

Additional assessment was undertaken to identify noise impacts associated with modifications 1 and 2. These assessments found that at identified receiver locations, noise impacts will be the same or lower than presented in the EIS. All identified receiver locations were found to comply with the nominated noise criteria in the EIS.

6.2.2 Impact assessment

Methodology

Given the small scale and short-term nature of construction activities a detailed noise assessment was not required.

Renzo Tonin & Associates have undertaken an assessment of noise and vibration impacts associated with the proposed modifications to operation. The potential impacts have been presented in two reports which have been included in Appendix E.

An initial Noise Impact Assessment report was prepared (Kings Park Waste Metal Recovery Processing and Recycling Facility - Noise Impact Assessment, Renzo Tonin & Associates, 12 December 2018) which identified potential impacts from the proposed modification to operational hours. This initial noise impact assessment was prepared to confirm the suitability of the proposed activities outside of hours, ensuring that there was no impact on surrounding receivers (i.e. non-compliance with criteria).

The initial Noise Impact Assessment report utilised noise monitoring results from noise assessments for the Original Approval and subsequent modifications (1 and 2) to establish background noise levels and relevant noise criteria. Noise generating activities associated with cleaning and maintenance activities proposed as part of this modification were then modelled to identify predicted noise levels for comparison against the established noise criteria.

On confirmation of the initial noise report achieving compliance at surrounding receivers, an additional noise assessment letter (Kings Park Waste Metal Recovery, Processing and Recycling Facility - Modification 3 Difference to Acoustic Impacts, Renzo Tonin & Associates, 20 December 2018) was developed to assess all the modifications proposed as part of this modification application. To assess the

difference in predicted noise levels between the existing development (including the Original Approval and subsequent modifications) and the development including the proposed modifications, the CadnaA noise model used within previous assessments was updated to include the proposed modifications.

Construction

Construction works would be temporary and small scale and as a result are anticipated to be at or below the levels of the operational assessment (shown below).

Operation

The design changes forming the Modification Proposal were updated within the CadnaA noise model developed for the Original Approval EIS (and updated for subsequent modifications 1 and 2). The resultant change in acoustic impacts for the identified receiver locations are shown in the Table 9.

Table 9 Change in acoustic impacts from the Modification Proposal

Receiver	Change in Acoustic Impact
R1 - Residential Premises to the east - Sunnyholt Road	No change
R2 - Residential Premises to the north - Camorta Close	Reduction by 1dB(A)
R3 - Residential Premises to the west - Railway Road	No change
R4 - Neighbouring Industrial Premises to the north - 38 Tattersalls Road	Reduction by 5dB(A)
R5 - Neighbouring Industrial Premises to the west - 57-69 Tattersalls Road	No change
R6 - Neighbouring Industrial Premises to the east - 21 Tattersalls Road	Reduction by 2dB(A)
R7 - Neighbouring Industrial Premises to the south - 38 Forge Street	Reduction by 3dB(A)

It can be seen from the table above that with changes from the Modification Proposal the predicted noise levels to identified receivers will be the same or lower than the noise levels presented in the previous assessments. All receivers were predicted to comply with the nominated criteria in the previous assessments and therefore all receivers are predicted to comply with the Modification Proposal.

6.2.3 Mitigation measures

As the Modification Proposal would not result in an increase in noise impacts as presented within the original approval. A such, no further mitigation measures relating to noise would be required.

6.3 Fire and incident management

In January 2018 a Fire Order was placed on the Site operations. The Modification Proposal would result in an alteration to the design of the fire protection equipment. Proposed amendments to the fire engineering plans is provided in Appendix C. The impact of these changes has been discussed below.

6.3.1 Previous assessment

The EIS for the project provided an assessment of potential fire and incident impacts from the Project. Floc Material was identified as a potential source of fire. The EIS provided mitigation measures including the provision of water cannons and managing the stockpile by keeping it small. Uncontrolled leaks or spills were also identified as a potential incident that could contaminate soils within unsealed sections of the Site or be entrained within stormwater flow to the detention basin, potentially result in an impact to Breakfast Creek. No further assessment was undertaken for Modifications 1 or 2.

6.3.2 Impact assessment

A report has been prepared by Hydraulic and Fire Protection Engineers – M.J. Harvey & Associates Pty Ltd, on the suitability of the proposed fire project measures and has been included in Appendix C. Report confirms that the proposed fire hydrants and water cannons would be suitable to manage fire risk to the Project (including the Modification Proposal). Further design of fire management measures relating to offices / amenities would be prepared as required, during detailed design.

6.3.3 Mitigation measures

Further design of fire management measures would be undertaken as part of the detailed design (as necessary).

6.4 Soil and water

6.4.1 Previous assessment

The assessment of potential soil and water impacts within the EIS identified that there are a number of activities that are undertaken on site that have the potential to generate contaminants. Potential contaminants include but are not limited to sediments, oils and greases, acids, metals, asbestos and plastics. Construction activities with the potential to impact on soil and water include earthworks and construction of Site infrastructure within the riparian corridor of Breakfast Creek. During operation impacts would result from the use of potable water and the potential for contamination from on-site activities. The EIS identified that with the implementation of mitigation measures the impact of the project on soil and water could be minimised and appropriately managed.

Further assessment of Modifications 1 and 2 within their respective SEE's did not identify any changes to the soil and water impacts of the proposal as presented within the EIS.

6.4.2 Impact assessment

The Modification Proposal would involve the construction of new infrastructure including fencing, signage and site offices. The Modification Proposal would also involve minor modifications to existing infrastructure. Construction of these modifications would not require significant excavation and potential impacts to soil and water from construction activities could be effectively managed with the mitigation measures as proposed within the existing CEMP (and relevant subplans).

During operation the proposed modifications would not result in a change to the activities undertaken on site, the types and quantities of potential contaminants and the potable water consumption of the facility.

Given the minor nature of the modifications, the Modification Proposal would not result in impacts above those identified within the original approval.

6.4.3 Mitigation Measures

As the Modification Proposal would not result in a change to the impact as presented within the original approval, no further mitigation measures relating to soil and water would be required.

6.5 Visual

6.5.1 Previous assessment

The EIS prepared for the original approval included an assessment of the visual impacts of the project. The assessment identified that:

- The project is in a disturbed and heavily developed industrial area.
- There are no views of the Site from sensitive receptor locations.
- Views of the Site from Tattersall Road would be limited due to the presence of the existing no fence, landscaping and buildings.
- The project would not result in significant visual impacts.
- A landscape concept plan will be developed to enhance landscaping along the Site boundaries, particularly the frontage with Tattersall Road.

The visual assessment was updated within Modification 1 to assess the impact of an increase in height of the acoustic enclosure. The updated assessment concluded that the visual impact assessment included within the EIS would not change as a result of Modification 1, as existing vegetation would continue to provide screening of the modified infrastructure.

The visual assessment was further update within Modification 2 to assess the impact of an increasing the height of the acoustic wall along the western boundary of the Site. The assessment concluded that the visual impact assessment included within the original EIS is generally unchanged, the proposed change to the acoustic wall height is minor and is considered generally consistent with the original EIS and therefore would not result in any significant adverse impacts to the existing streetscape or trees in the front setback area. The proposed modification will not result in any adverse impacts to the existing streetscape.

6.5.2 Impact assessment

A review of the updated site plans and elevations for the Modification Proposal has been undertaken to assess the potential for a change in visual impacts as a result of the proposed modifications. Modifications that have the potential to impact on the surrounding visual landscape and the Tattersall Road Streetscape include:

- Increasing the height of the metal awning
- Extension of existing fencing along the Tattersall Road frontage and at entrances to the Site
- Installation of direction signage at the entrances to the Site

The existing chain link fence (and mesh for dust cover) along the Tattersall Road frontage would be replaced with a colorbond (or equivalent) barrier to provide shielding (visual, dust and noise) of the metal recovery, processing and recycling activities. This fence would be constructed to integrate with the recently constructed

covering of the Building L and the proposed alteration to the Metal awning (see above).

The fence would be located above the existing acoustic wall (Hebel blocks) and be at a maximum height of 13 m (consistent with the height of the existing chain link fence that would be removed). Fencing would be also replaced (for a distance of approximately 55m) along the western side of the central entrance to the Site.

All fencing has been designed to integrate into the existing development and would be in keeping with the industrial nature of the area. The new fencing would visually shield operations in the Site from Tattersall Road. With the implementation of the landscaping plan, as included in the EIS the installation of fencing would have no more than a minor impact on the Tattersall Road Streetscape and would not significantly increase the impact as presented with the original approval.

Directional signage would be installed at entrances to the Site to inform staff and customers. This signage would only be visible from Tattersall Road and would be in keeping with the industrial nature of the surrounding area. As such, this signage would not have a significant impact visual landscape.

Other changes to the visual landscape within the Site include:

- Installation of additional elevated offices and amenities within buildings A and B
- Installation of amenities within yard area (to the north of Building D)
- Relocation of the pre-shredder from the approved location further south west, to the area identified as the 'hand unload area'
- Relocation of 'hand unload' operations to Building B.
- Minor realignment of the conveyor to follow the building line (on the roof) of Building C

These elements of the modification would be contained within the Site boundary and would not be visible to sensitive receptors or from Tattersall Road. Consequently, they would not result in a change to the visual impact of the project as assessed within the original approval.

6.5.3 Mitigation measures

As the Modification Proposal would not result in a change to the impact as presented within the original approval, no further mitigation measures relating to the visual landscape would be required.

6.6 Other issues

Table 10 provides an assessment of other key environmental issues identified in the SEARs for the Project, which are considered to result in a negligible or minor change from that provided within the relevant sections of the EIS, Modification 1 and Modification 2 as a result of the Modification Proposal.

Table 10 Key Issues identified in the SEARs with a minor environmental impact

Key issue	Environmental assessment of Modification Proposal
Hazards and risk	A Preliminary Hazards Assessment (PHA) was prepared for the EIS to identify hazards and risk associated with the project. The PHA indicated that there was no significant offsite impact from the use of dangerous goods on site due to the small quantities involved. The key potential risk is from the rupture of a 45kg LPG cylinder in the dangerous goods store. However, the SW criteria for offsite fatality and property damage are considered to be satisfied due to the rarity of LPG

Key issue	Environmental assessment of Modification Proposal
	cylinder ruptures. The development is not considered to be a hazardous industry as defined in SEPP 33.
	Assessment undertaken for Modifications 1 and 2 found that these modifications would not alter the outcomes of the hazards and risk assessment as presented in the EIS.
	Changes to the project from the Modification Proposal are minor and include only small-scale operational changes to the approved operations of the facility. The Modification Proposal would not impact upon the overall operations including throughput of waste, operational workforce, hours of operation or traffic movements. As such, the Modification Proposal would not change the assessment of hazards and risk as presented in the EIS.
Transport, access and parking	The DGR's for the original approval required and assessment of transport access and parking impacts of the Proposal. The modifications proposed within the Modification Proposal would be minor and would not result in a change to the throughput, parking or access arrangements at the Site. As such, the Modification Proposal would not change the outcomes and recommendations as presented in the original approval.
Indigenous and non-Indigenous heritage	The original approval considered potential heritage impacts in Section 6.2 of the EIS. The assessment identified that it was highly unlikely that the project would impact on heritage values. Given the minor nature of the proposed changes in the Modification Proposal, the outcomes and recommendations as presented in the original approval would not change.
Socio-economic	Given the minor nature the modification, the Modification Proposal is not expected to create any additional socio-economic impacts that have not already been considered and assessed as part of the original approval.
Waste Management	The project would involve the generation of various waste streams which if not managed appropriately have the potential to result in environmental impacts. However, the Modification Proposal would not result in changes to waste streams approved in SSD 5041 and would not change the assessment of impacts as presented in the EIS.
Greenhouse gas	The DGR's for the original approval required and assessment of the greenhouse gas impacts of the Proposal. An assessment of greenhouse gas impacts is presented in Section 6.5 of the EIS for the original approval. The modifications proposed within the Modification Proposal would be minor and would not result in a change to throughput, resource usage or processing techniques utilised at the Site. As such, the Modification Proposal would not change the greenhouse gas outcomes and recommendations as presented in the original approval.

7 SUMMARY OF MITIGATION MEASURES

This Modification Proposal has identified a range of environmental impacts and recommended management and mitigation measures to avoid, remedy or mitigate these impacts.

In general, the existing mitigation measures are considered to be suitable to mitigation the impacts of the project as modified (through this and previous modification proposals). In addition to those already identified as part of the original approval a summary of the measure identified as relevant to the Modification Proposal is provided in Table 11.

Table 11 Mitigation measures in addition to the REMMs

Aspect	Mitigation measure	
Fire and incident management	 Further design of fire management measures would be undertaken as part of the detailed design (as necessary). 	

8 CONCLUSION

To respond to changing market and policy conditions the Applicant is seeking approval to Modify approval SSD 5041 in accordance with Section 4.55 (1A) of the EP&A Act.

Changes to the Original Approval as part of the Modification Proposal include:

- Installation of a metal awning and processing equipment
- · Changes to fencing and signage
- Installation of offices and amenities within Building A and Building B
- · Installation of amenities with the yard area
- · Relocation of the pre-shredder
- Minor realignment of the conveyor
- Extension of operational hours
- Administrative changes

This modification report assesses the potential impacts of the proposed modifications and concludes that with the implementation of the mitigation measures as proposed in Section 7 the Modification Proposal would not result in a change in impact as presented within the EIS for the Original Approval.

APPENDIX A

SSD 5041 Approval / Mitigation Measures (as modified by MOD 1 and MOD 2)

Development Consent

Section 89E of the Environmental Planning and Assessment Act 1979

I grant consent to the development application referred to in Schedule 1, subject to the conditions in Schedule 2.

These conditions are required to:

- prevent, minimise, and/or offset adverse environmental impacts including economic and social impacts;
- set standards and performance measures for acceptable environmental performance;
- require regular monitoring and reporting; and
- provide for the ongoing environmental management of the development.

Daniel Leary

A/Executive Director

Key Sites and Industry Assessments

Sydney Z Nov6MPER

2015

Application No.:

SSD 5041

SCHEDULE 1

Applicant:

Sell and Parker Pty Ltd

Consent Authority:

Minister for Planning

Land:

23-43 and 45 Tattersall Road, Kings Park (Lot 2 DP 550522

and Lot 5 DP 7086)

Development:

Increasing the processing capacity of the existing metal recycling facility, including reconfiguration and expansion of the facility into the adjoining site at 23-43 Tattersall Road,

Kings Park.

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DEFINITIONS

Act Environmental Planning and Assessment Act 1979

Applicant Sell and Parker Pty Ltd, or anyone else entitled to act on this consent

Construction The demolition of buildings or works, the carrying out of works, including bulk

earthworks, and erection of buildings and other infrastructure covered by this

consent

Council Blacktown City Council

Day The period from 7 am to 6 pm on Monday to Saturday

Department Department of Planning and Environment

Development The development that is approved by this development consent and as

generally described in Schedule 1

EIS Environmental Impact Statement prepared by ERM dated July 2014

ENM Excavated Natural Material

EPA Environment Protection Authority

EPL Environment Protection Licence under the Protection of the Environment

Operations Act 1997

Evening The period from 6 pm to 10 pm

Feasible Feasible relates to engineering considerations and what is practical to build

Heavy vehicle Any vehicle with a gross vehicle mass of 5 tonnes or more

Heritage Item An item as defined under the Heritage Act 1977, and assessed as being of

local, State and/ or National heritage significance, and/or an Aboriginal Object or Aboriginal Place as defined under the *National Parks and Wildlife Act 1974*.

Incident A set of circumstances that:

• causes or threatens to cause material harm to the environment; and/or

breaches or exceeds the limits or performance measures/criteria in this

consent

Material harm to the

environment

Actual or potential harm to the health or safety of human beings or to

ecosystems that is not trivial

Mitigation Activities associated with reducing the impacts of the development prior to or

during those impacts occurring

Morning shoulder The period from 6 am to 7 am on Monday to Saturday

OEH Office of Environment and Heritage
Operation The receipt or processing of waste

POEO Act Protection of the Environment Operations Act 1997

Reasonable Reasonable relates to the application of judgement in arriving at a decision,

taking into account: mitigation benefits, cost of mitigation versus benefits

provided, community views and the nature and extent of potential

improvements

Regulation Environmental Planning and Assessment Regulation 2000

Secretary Secretary of the Department, or nominee

Site Land referred to in Schedule 1

VENM Virgin Excavated Natural Material

SCHEDULE 2

PART A ADMINISTRATIVE CONDITIONS

OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT

A1. The Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or decommissioning of the Development.

TERMS OF CONSENT

- A2. The Applicant shall carry out the Development in accordance with the:
 - a) EIS prepared by ERM dated July 2014;
 - b) Response to Submissions report prepared by ERM dated 7 January 2015;
 - c) Supplementary Response to Submissions prepared by Mecone dated 30 June 2015;
 - d) Supplementary Response to Submissions prepared by Sell and Parker Pty Ltd dated 3 September 2015;
 - e) Site layout plans and drawings (See Appendix A); and
 - f) Management and Mitigation Measures (see Appendix B).
- A3. If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.
- A4. The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of:
 - a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this consent; and
 - b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.

STATUTORY REQUIREMENTS

A5. The Applicant shall ensure that all licences, permits, and approvals/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approvals/consents.

BUILDING CODE OF AUSTRALIA

A6. The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the *Building Code of Australia*.

LIMITS OF CONSENT

Waste limits

- A7. The Applicant shall not receive or process on the site more than 350,000 tonnes per calendar year of waste, subject to Condition A8.
- A8. Despite Condition A7, the Applicant shall not receive or process on the site more than 90,000 tonnes per calendar year of waste (on a weekly pro-rata basis) until:
 - a) the Emissions Collection System for the hammer mill has been commissioned in accordance with Condition B20 and approved by the Secretary for operation; and
 - b) a Final Occupation Certificate has been issued for the Development.

- A9. In deciding whether to grant approval to operate the Emissions Collection System for the hammer mill in accordance with Condition A8, the Secretary shall take into account the Commissioning Report submitted in accordance with Condition B21.
- A10. The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.

Waste type

A11. The Applicant shall not cause, permit or allow any materials or waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by an EPL.

DEMOLITION

A12. The Applicant shall ensure that all demolition work is carried out in accordance with *Australian Standard AS 2601:2001: The Demolition of Structures*, or its latest version.

SURRENDER OF CONSENT

A13. In order for the development of land to proceed in a coordinated and orderly manner and to avoid potential conflicts with this consent, the Applicant shall and in the manner prescribed by clause 97 of the Regulation, surrender the development consents described in Table 1 within 14 days of the issue of a Construction Certificate for the Development.

Table 1 - Consents to be surrendered

Development A	Development Application No. DA-96-305		
Land	45 Tattersall Road, Kings Park		
description			
Development	Metal recycling facility on the southern portion of the site.		
Description			
Date	27 November 1996		
Development A	Development Application No. 10204 of 2000		
Land	45 Tattersall Road, Kings Park		
description			
Development	Establishment of a hammermill and associated components and an		
Description	approved handling capacity of 60,000 tpa on the northern portion of the		
	site.		
Date	11 May 2001		

STAGED SUBMISSION OF PLANS OR PROGRAMS

- A14. With the approval of the Secretary, the Applicant may:
 - a) submit any strategy, plan or program required by this consent on a progressive basis; and/or
 - b) combine any strategy, plan or program required by this consent.
- A15. Until they are replaced by an equivalent strategy, plan or program approved under this consent, the Applicant shall continue to implement existing strategies, plans or programs for operations on site that have been approved by previous consents or approvals.

Note:

- If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages and the trigger for updating the strategy, plan or program.
- There must be a clear relationship between the strategy, plan or programs that are to be combined.

OPERATION OF PLANT AND EQUIPMENT

- A16. The Applicant shall ensure that all plant and equipment used for the Development is:
 - a) maintained in a proper and efficient condition; and
 - b) operated in a proper and efficient manner.

METEOROLOGICAL MONITORING

A17. Within 14 days of the issue of a Construction Certificate for the Development, the Applicant shall install a suitable meteorological station on the site that complies with the requirements in the latest version of the *Approved Methods for Sampling of Air Pollutants in New South Wales*. The Applicant shall operate the meteorological station for the life of the Development.

PROTECTION OF PUBLIC INFRASTRUCTURE

- A18. The Applicant shall:
 - a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the Development; and
 - b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the Development.

DISPUTE RESOLUTION

A19. In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the Development, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.

PART B ENVIRONMENTAL PERFORMANCE

WASTE MANAGEMENT

- B1. Within 14 days of the issue of a Construction Certificate for the Development, the Applicant shall implement a Waste Monitoring Program for the Development. The program must:
 - a) be prepared by a suitably qualified and experienced person(s);
 - b) include suitable provisions to monitor the:
 - (i) quantity, type and source of waste received on site; and
 - (ii) quantity, type and quality of the outputs produced on site.
 - c) ensure that:
 - (i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and
 - (ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.

SOIL AND WATER

Compliance Certificate

B2. A Section 73 Compliance Certificate under the *Sydney Water Act 1994* must be obtained from Sydney Water prior to the commencement of construction.

Pollution of waters

B3. The Development shall comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.

Water Management Plan

- B4. Prior to the commencement of construction of the Development, the Applicant shall prepare a Water Management Plan to the satisfaction of the Secretary. The plan must:
 - a) be prepared by a suitability qualified and experienced person(s) in consultation with the EPA;
 - b) include a detailed site water balance;
 - c) include details of water management, monitoring and incident response arrangements;
 - d) include the details of the:
 - (i) Water Management System for the site (see Condition B6);
 - (ii) Water Management System commissioning, including the time frames for each stage of the commissioning (see Condition B7);
 - (iii) Water Treatment Plant Trial, if required (see Condition B8);
 - (iv) erosion and sediment controls (see Condition B9);
 - (v) bunding (see Condition B10);
 - (vi) flood management (see Condition B11); and
 - (vii) clean water runoff areas that discharge direct to stormwater without treatment (i.e. car parks and roofs).
- B5. The Applicant shall carry out the Development in accordance with the Water Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.

Water Management System

- B6. The Applicant shall operate a Water Management System for the site. The system must:
 - a) be designed by a suitably qualified and experienced person(s) in consultation with the EPA;
 - b) include a treatment system with primary, secondary and tertiary treatment components;
 - c) be consistent with the guidance in *Managing Urban Stormwater Soils and Construction Vol. 1* (Landcom, 2004);
 - d) divert clean surface water around operational areas of the site:
 - e) include water quality monitoring that can determine the performance of the water management system against the EPL discharge limits;
 - f) include water reuse based on a risk assessment of environment and human health impacts; and
 - g) be commissioned in accordance with Condition B7.

Water Management System commissioning

- B7. The Applicant shall commission the Water Management System prior to discharging any water from the site. The commissioning must:
 - be completed within 2 years from the date of this consent, or within such other time agreed in writing by the Secretary;
 - b) be undertaken by a suitability qualified and experienced person(s) in consultation with the EPA:
 - c) include a program for acquiring baseline data of receiving waters and the establishment of site specific stormwater discharge criteria in the EPL;
 - d) including testing of the performance of all components of the Water Management System, including the primary, secondary, and tertiary treatment systems;
 - e) identify and implement changes to the Water Management System that may be necessary to achieve compliance with the discharge criteria in the EPL; and
 - f) include off-site trials of treatment technologies if necessary.

Water Treatment Plant trial

B8. As part of commissioning the Water Management System, the Applicant may implement off-site trials of components of the Water Management System. Any trial must be conducted by a suitably qualified and experienced person(s) in consultation with the EPA.

Erosion and sediment control

B9. The Applicant shall implement erosion and sediment control measures on-site in accordance with *Managing Urban Stormwater: Soils and Construction Vol. 1* (Landcom, 2004).

Bunding

B10. The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007.

Flood management

- B11. The Applicant shall ensure that:
 - a) the finished floor level of any new building is a minimum of 0.5 metres above the 1 in 100 year Average Recurrence Interval flood level;
 - b) any part of a new structure below the 1 in 100 year Average Recurrence Interval flood level is designed and constructed to be compatible with flooding; and
 - c) any perimeter fence or wall does not restrict or impede the flow of overland flow.

Imported soil

- B12. The Applicant shall:
 - a) ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the site;
 - b) keep accurate records of the volume and type of fill to be used; and
 - c) make these records available to the Department upon request.

Contamination

- B13. Prior to commencing any excavation works, the Applicant shall:
 - a) identify all potential contaminants that could be disturbed, mobilised and discharged to receiving waters;
 - b) detail the procedures for testing, classifying, handling, storing and disposing of contaminated water, soils and/or groundwater encountered in excavations, in particular during excavation of the stormwater detention basin; and
 - c) detail the measures for periodically testing surface water run-off that may accumulate in excavations, and the procedures for off-site disposal of contaminated water.
- B14. The Applicant shall provide a contamination report to the Department detailing any contamination investigation carried out in the immediate vicinity of the existing detention basin. This report shall be provided to the Department on completion of the works to upgrade the detention basin.

AIR QUALITY

Odour

B15. The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).

Emissions limits

B16. The Applicant shall ensure that emissions from the Development do not exceed the emission limits specified in the EPL.

Air Quality Management Plan

- B17. Prior to the commencement of construction of the Development, the Applicant shall prepare an Air Quality Management Plan to the satisfaction of the Secretary. The plan must:
 - a) be prepared by a suitably qualified and experienced person(s) in consultation with the FPA.
 - b) describe the measures that would be implemented to ensure:
 - (i) all reasonable and feasible measures are employed to minimise air emissions;
 - (ii) compliance with the relevant conditions of this consent;
 - (iii) contingency measures are deployed to minimise impacts should adverse air emissions occur or appear likely to occur;
 - include well defined triggers for the deployment of construction and operational air quality measures;
 - d) include well defined triggers for ceasing or partially ceasing operations on site during adverse air quality conditions;
 - e) include an Air Quality Monitoring System to evaluate the performance of the Development commensurate with the system proposed in the Air Quality Assessment, prepared by ERM dated September 2015;
 - f) include details of the location, frequency and duration of monitoring; and
 - g) include a protocol to determine the occurrence of any exceedance of the criteria in the EPL should an exceedance occur.
- B18. The Applicant shall carry out the Development in accordance with the Air Quality Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.

Air emissions mitigation

- B19. The Applicant shall:
 - a) operate the Development so that air emissions are minimised during all meteorological conditions; and
 - b) implement best management practice, including all reasonable and feasible air and odour emissions mitigation measures to minimise emissions from the Development, including but not limited to:
 - installation of an Emissions Collection System servicing the hammer mill that is capable of achieving emission control performance equivalent to the system described in the Air Quality Assessment prepared by ERM dated September 2015;
 - (ii) operating one oxy-acetylene torch at a time;
 - (iii) operating the oxy-acetylene torch only between the hours of 9 am and 3 pm;
 - (iv) cutting any metal beam that is up to 100 millimetres thick with the shear, where possible;
 - (v) enclosure of all conveyors and conveyor transfer points;
 - (vi) dust suppression through the use of water sprays/misters;
 - (vii) sealing of on-site surfaces and regularly maintaining them to prevent dust reentrainment from vehicle movements and other equipment use; and
 - (viii) installation of appropriate dust screens at the property boundaries.

Emissions Collection System commissioning

- B20. The Applicant shall commission the Emissions Collection System for the hammer mill. The commissioning must:
 - a) be undertaken by a suitability qualified and experienced person(s) in consultation with the EPA;

- b) test the performance of the system against the performance parameters set out in the Air Quality Assessment prepared by ERM dated September 2015; and
- c) identify and implement any changes to the system that may be necessary to achieve environmental air quality performance commensurate with that set out in the Air Quality Assessment prepared by ERM dated September 2015.

Commissioning Report

B21. The Applicant shall submit to the Secretary a Commissioning Report detailing the outcomes of the commissioning of the Emissions Collection System for the hammer mill.

Construction emissions mitigation

- B22. During construction, the Applicant shall ensure that:
 - a) all vehicles on site do not exceed a speed of 30 kilometres per hour:
 - b) all loaded construction vehicles entering or leaving the site have their loads covered; and
 - c) all construction vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking the materials on public roads.

Stockpile management

B23. The Application shall manage stockpiles of scrap metal and processed material to ensure air emissions are minimised.

EXPLOSION LIMITS

Airblast overpressure

- B24. The Applicant shall undertake all reasonable and feasible measures necessary to prevent explosions from occurring at the Premises.
- B25. The Applicant shall ensure that the airblast overpressure level from any explosions on the premises does not exceed 120dB (Lin Peak) when measured at the boundary of the premises.

NOISE AND VIBRATION

Noise criteria

B26. The Applicant shall ensure that noise generated by the construction and/or operation of the Development does not exceed the noise criteria in Table 2.

Table 2: Noise criteria (dB(A))

Location	Noise criteria (dB(A))			
	Day Evening Morning Shoulder		Shoulder	
L _{Aeq (15 minute)}		L _{Aeq (15 minute)}	L _{Aeq (15 minute)}	L _{Aeq (1 minute)}
189 Sunnyholt Road	46	46	46	58

Noise compliance measurement

B27. Noise generated by the Development is to be measured in accordance with the relevant requirements and exemptions (including certain meteorological conditions) of the latest version of the *NSW Industrial Noise Policy*.

Vibration criteria

B28. The Applicant shall ensure that vibration resulting from the Development does not exceed the continuous or impulsive vibration criteria in EPA's Assessing Vibration: A Technical Guideline (February 2006) at residential receivers.

Noise Management Plan

- B29. Prior to the commencement of construction of the Development, the Applicant shall prepare a Noise Management Plan to the satisfaction of the Secretary. The plan must:
 - a) be prepared by a suitably qualified and experienced persons(s) in consultation with the EPA:
 - b) describe the measures that would be implemented to ensure:
 - (i) all reasonable and feasible measures are employed to minimise noise impacts;

- (ii) the installation and maintenance of appropriate physical noise barriers;
- (iii) air handling devices are designed and located to minimise noise impacts;
- (iv) truck drivers are aware of suitable truck noise mitigation measures;
- (v) contingency measures are deployed to minimise impacts should an exceedence of the criteria occur or appear likely to occur; and
- (vi) compliance with the relevant conditions of this consent;
- include a Noise Monitoring Program to evaluate the performance of the Development;
 and
- d) include a protocol to determine the occurrence of an exceedence of the criteria in this consent should such an exceedence occur.
- B30. The Applicant shall carry out the Development in accordance with the Noise Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.

Construction and operation hours

B31. The Applicant shall comply with the construction and operation hours in Table 3 unless otherwise agreed to in writing by the Secretary.

Table 3: Hours of Construction and Operation

Activity		Day	Hours
Construction		Monday – Friday	7 am to 6 pm
		Saturday	8 am to 1 pm
		Sunday & Public Holidays	Nil
	Oxy-acetylene torch	Monday – Saturday	9 am to 3 pm
Operation	cutting	Sunday & Public Holidays	Nil
	All other activities	Monday – Saturday	6 am to 9 pm
		Sunday & Public Holidays	Nil

B32. Despite condition B31, the delivery of material to the site may occur at any time, if that delivery is required by police or other authorities; and/or of there is an on-site emergency that poses an immediate danger to personnel or equipment; and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification shall be provided to the EPA and affected residents as soon as possible, or within a reasonable period in the case of emergency.

Noise mitigation

B33. The Applicant shall:

- a) implement best management practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the Development;
- b) minimise the noise impacts of the Development during adverse meteorological conditions:
- c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and
- d) regularly assess noise monitoring data and relocate, modify and/or stop operations to ensure compliance with the noise criteria in this consent.

TRAFFIC AND ACCESS

- B34. The Applicant shall ensure that:
 - a) site access, driveways and parking areas are constructed and maintained in accordance with the latest versions of *Australian Standard AS 2890.1* and *AS 2890.2*;
 - b) the swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AUSTROADS Guide to Road Design:
 - the Development does not result in any vehicles parking or queuing on the public road network:
 - d) all vehicles are wholly contained on site before being required to stop;
 - e) all loading and unloading of heavy vehicles is carried out on-site;

- f) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times; and
- g) all vehicles enter and leave the site in a forward direction.

HAZARD AND RISK

Fire management

B35. The Applicant shall:

- a) implement suitable measures to minimise the risk of fire on-site including but not limited to the recommendations in the *Preliminary Hazard Analysis of Sell & Parker Pty Ltd Metal Recycling Facility Expansion* prepared by Arriscar dated 10 March 2014;
- b) ensure the height of any stock pile of shredder floc does not exceed 4 metres;
- c) extinguish any fires on-site promptly; and
- d) maintain adequate fire-fighting capacity on-site.

Emergency Response

- B36. The Applicant shall prepare and implement an emergency response plan for the site. The plan must:
 - a) include a risk assessment of likely incidents that could occur on-site (e.g. spills, explosion, fire and flood) based on the activities being undertaken, site risks and consequence to the receiving environment;
 - b) include the early warning flood readiness and evacuation plan for the site;
 - c) document the systems and procedures to deal with the types of incidents identified including relevant incident notification procedures; and
 - d) be accessible on the site at all times.

VISUAL AMENITY

Lighting

B37. All external lighting associated with the Development shall be mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadways. The lighting shall be the minimum level of illumination necessary and shall comply with *Australian Standard AS 4282 1997*.

Signage

B38. The Applicant shall install any new signage in consultation with Council.

Note: This condition does not apply to signage identified as exempt or complying development in State Environmental Planning Policy (Exempt and Complying Development Codes) 2008.

Landscaping

- B39. Prior to the commencement of construction of the Development, the Applicant shall prepare a Landscape Management Plan to the satisfaction of the Secretary. The plan shall:
 - a) be prepared by a suitably qualified and experienced person(s);
 - b) detail the landscaping measures including vegetation that would be implemented to minimise the visual impact of the Development, particularly from adjoining premises and public vantage points;
 - c) describe the measures to be implemented to protect and retain the mature trees along the northern boundary of the site; and
 - d) include measures for monitoring and maintenance of revegetated areas.
- B40. The Applicant shall carry out the Development in accordance with the Landscape Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.

HERITAGE

B41. The Applicant shall cease all works on site in the event that any Aboriginal cultural object(s) or human remains are uncovered onsite. The NSW Police, the Aboriginal Community and the

OEH are to be notified. Works shall not resume in the designated area until consent in writing from the NSW Police and/or the OEH has been obtained.

SECURITY

- B42. The Applicant shall:

 - install and maintain a perimeter fence and security gates on the site; and ensure that the security gates on site are locked whenever the site is unattended. b)

PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING

ENVIRONMENTAL MANAGEMENT

Construction Environmental Management Plan

- C1. Prior to the commencement of construction of the Development, the Applicant shall prepare a Construction Environmental Management Plan to the satisfaction of the Secretary. The Plan must:
 - a) be prepared by a suitably qualified and experienced person(s);
 - b) describe all activities to be undertaken on the site during construction, including a clear indication of construction stages;
 - c) identify the statutory approvals that apply to the Development;
 - d) outline all environmental management practices and procedures to be followed during construction (e.g. construction traffic management and construction noise and vibration management), including all reasonable and feasible mitigation measures to protect the amenity of the surrounding environment;
 - e) detail how the environmental performance of construction will be monitored, and what actions will be taken to address identified adverse environmental impacts;
 - f) describe of the roles and responsibilities for all relevant employees involved in construction;
 - g) include arrangements for community consultation and complaints handling procedures during construction; and
 - h) consolidate the construction related parts of any management plans and monitoring programs required in the conditions of this consent;
- C2. The Applicant shall carry out the development in accordance with the Construction Environmental Management Plan approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary.

Operational Environmental Management Strategy

- C3. Within 6 months of the date of this consent, the Applicant shall prepare an Operational Environmental Management Strategy to the satisfaction of the Secretary. This strategy must:
 - a) be prepared by a suitably qualified and experienced person(s);
 - b) provide a strategic framework for environmental management of the Development;
 - c) identify the statutory approvals that apply to the Development;
 - d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;
 - e) describe in general how the environmental performance of the Development would be monitored and managed; and
 - f) describe the procedures that would be implemented to:
 - (i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development;
 - (ii) receive, handle, respond to, and record complaints;
 - (iii) resolve any disputes that may arise;
 - (iv) respond to any non-compliance; and
 - (v) respond to emergencies.
- C4. The Applicant shall carry out the Development in accordance with the Operational Environmental Management Strategy approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary.

Management plan requirements

- C5. The Applicant shall ensure that the environmental management plans/strategies required under this consent are prepared in accordance with any relevant guidelines and include:
 - a) detailed baseline data:
 - b) a description of:
 - (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);
 - (ii) any relevant limits or performance measures/criteria;

- (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures;
- (iv) the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;
- c) a program to monitor and report on the:
 - (i) impacts and environmental performance of the Development;
 - (ii) effectiveness of any management measures;
 - (iii) a contingency plan to manage any unpredicted impacts and their consequences;
 - (iv) a program to investigate and implement ways to improve the environmental performance of the Development over time;
- d) a protocol for managing and reporting any:
 - (i) incidents:
 - (ii) complaints;
 - (iii) non-compliances with statutory requirements; and
 - (iv) exceedances of the impact assessment criteria and/or performance criteria; and
 - (v) a protocol for periodic review of the plan.
- C6. The Secretary may waive some of the requirements in Condition C5 if they are unnecessary or unwarranted for particular management plans/strategies.

REPORTING

Incident reporting

C7. The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the Development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.

Regular reporting

C8. The Applicant shall provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.

INDEPENDENT ENVIRONMENTAL AUDIT

- C9. Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:
 - a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
 - b) led by a suitably qualified auditor, and include experts in fields specified by the Secretary;
 - c) include consultation with the relevant agencies;
 - d) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under the approvals);
 - e) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and
 - f) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.
- C10. Within three months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

Annual review

- C11. Within 1 year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development. This review must:
 - describe the Development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year;
 - b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of the results against the:
 - (i) the relevant statutory requirements, limits or performance measures/criteria;
 - (ii) requirements of any plan or program required under this consent;
 - (iii) the monitoring results of previous years; and
 - (iv) the relevant predictions in the EIS;
 - c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;
 - d) identify any trends in the monitoring data over the life of the Development;
 - e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and
 - f) describe what measures will be implemented over the next year to improve the environmental performance of the Development.

Revision of strategies, plans and programs

- C12. Within 3 months of the submission of an:
 - a) annual review under Condition C11 above;
 - b) incident report under Condition C7 above;
 - c) audit under Condition C9 above; or
 - d) any modification to this consent,

the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent.

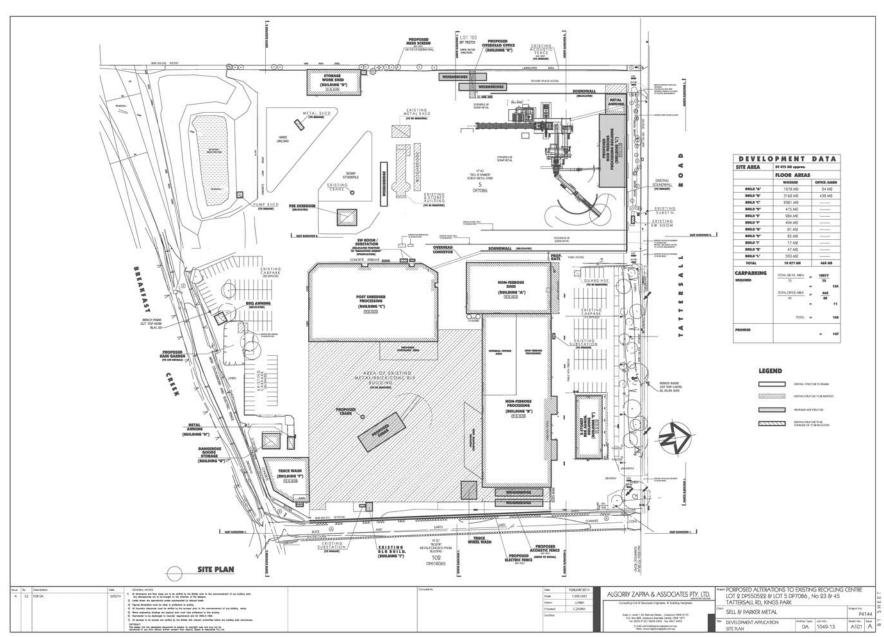
Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.

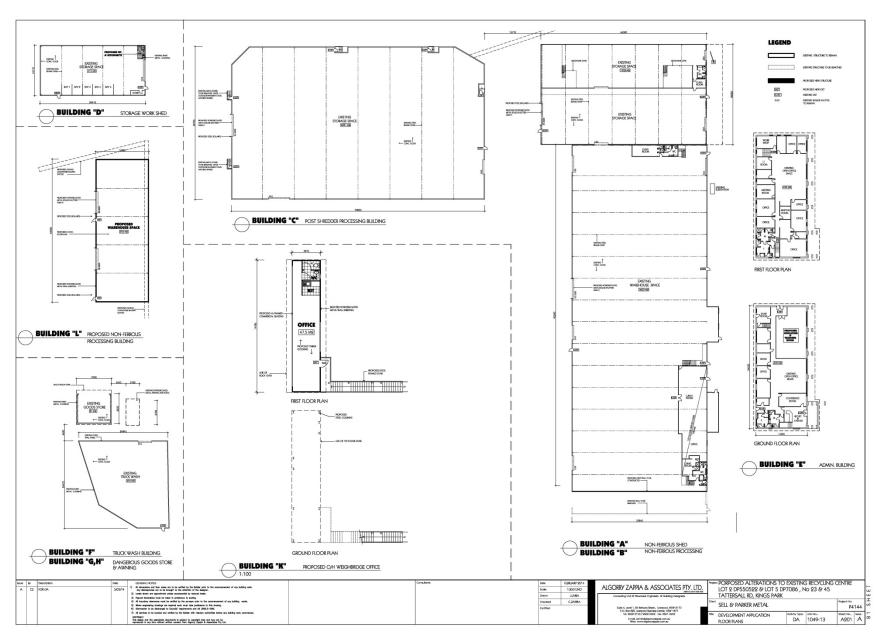
C13. The Applicant shall ensure that the operation of the Development is undertaken in accordance with all relevant updated and/or amended strategies, management plans and programs approved by the Secretary (or as revised and approved by the Secretary), unless otherwise agreed by the Secretary.

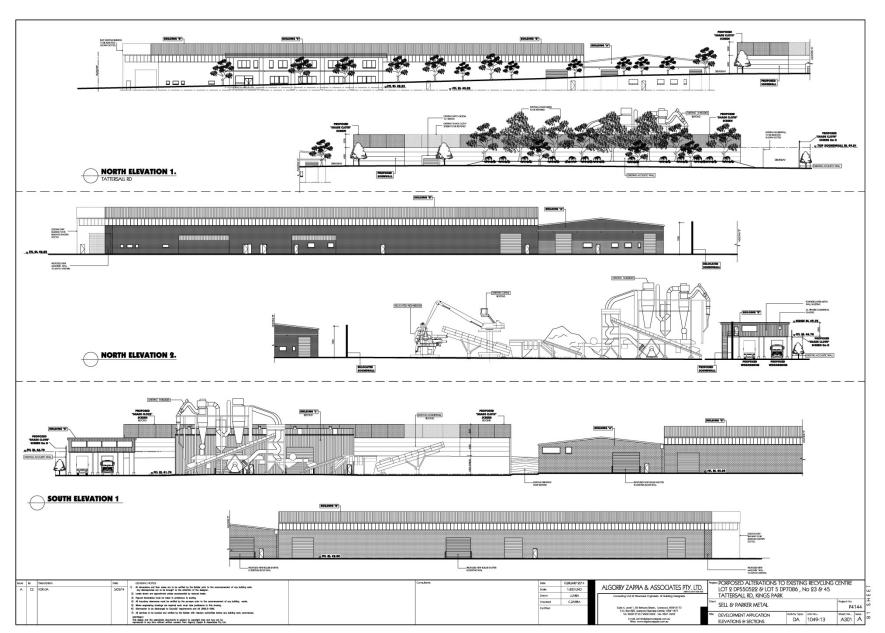
ACCESS TO INFORMATION

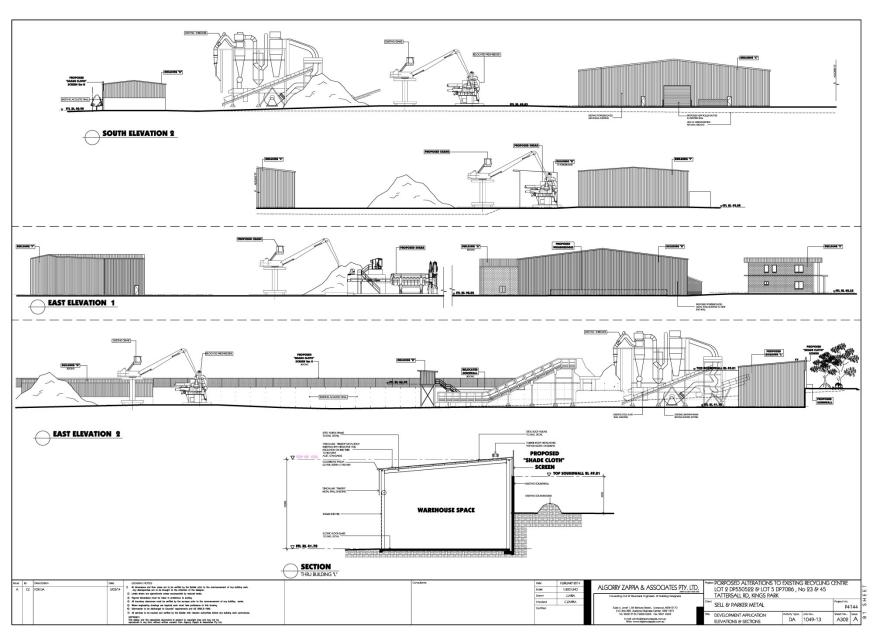
- C14. The Applicant shall:
 - a) make copies of the following publicly available on its website:
 - the documents referred to in Condition A2;
 - (ii) all current statutory approvals for the Development;
 - (iii) all approved strategies, plans and programs required under the conditions of this consent;
 - (iv) a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;
 - (v) a complaints register, updated on a monthly basis;
 - (vi) the annual reviews of the Development;
 - (vii) any independent environmental audit of the Development, and the Applicant's response to the recommendations in any audit; and
 - (viii) any other matter required by the Secretary; and
 - b) keep this information up to date.

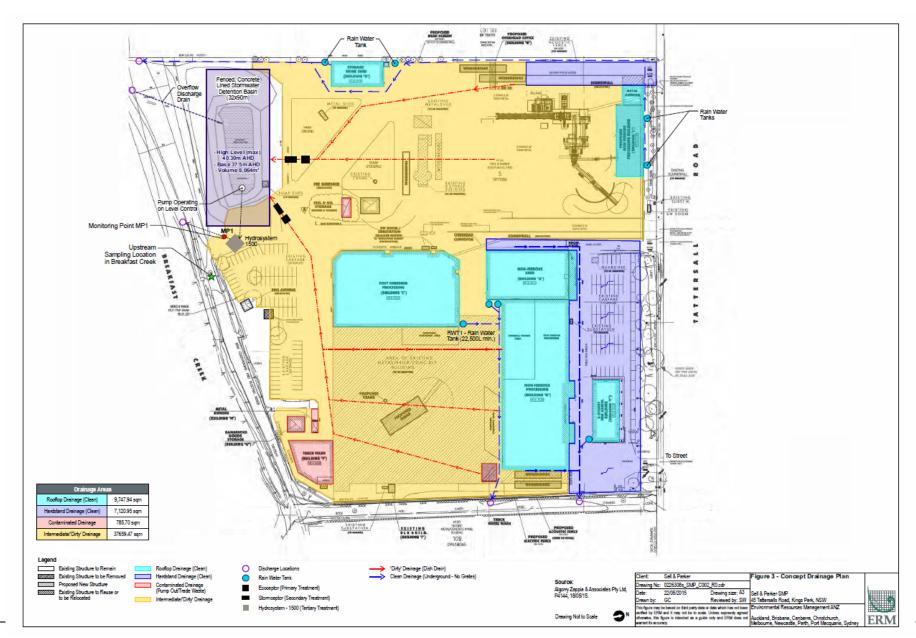
APPENDIX A - SITE AND LAYOUT PLANS











APPENDIX B – MANAGEMENT AND MITIGATION MEASURES	APPENDIX B – MANAGEMENT AND MITIGATION MEASURES		

Table B.1 Summary of Mitigation Measures

Issue	Potential Impact	Mitigation/ Management Measure
Ecology	The overall potential ecological impacts are considered low given the highly disturbed nature of the site. Only landscape trees separating the two current separate sites require removal. Potential impacts to threatened species are considered highly unlikely.	 The following recommendations aim to minimise ecological impacts of the proposed works: sediment control barriers will be installed at the site during construction and while earthworks are undertaken to reduce the likelihood of silted runoff into adjacent Breakfast Creek in the event of high rainfall; all vehicles are to keep to the existing and proposed access roads on-site at all times; and all work should be undertaken to prevent the spread of pests and noxious weeds in accordance with the Noxious Weeds Act 1993 and the Noxious and environmental weed control handbook - A guide to weed control in non-crop, aquatic and bushland situations (NSW Government, 2011).
Heritage (Indigenous)	Potential impacts to previously unknown indigenous artefacts or relics during ground disturbance activities.	 In accordance with the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW NSW, 2010) a conservative approach will be adopted at the site. The following mitigation measures will be implemented: all staff, contractors and others involved in the construction works would be made aware of the statutory legislation protecting sites and places of heritage significance; and all works would cease in the immediate area should any indigenous artefacts or relics be uncovered and the
Heritage (Historical)	Potential impacts to previously unknown items of historical significance during ground disturbance.	 Cultural Heritage Division of the NSW National Parks and Wildlife Service (OEH) contacted. The following mitigation measures are recommended to ensure that if any historical heritage artefacts are encountered appropriate measures are implemented: all staff, contractors and others involved in the works would be made aware of the statutory legislation protecting sites and places of heritage significance prior to works commencing; and in the event that a site or artefact (as defined by the National Parks and Wildlife Act 1974 or Heritage Act 1977) is identified during construction works, works shall cease at the location. The find shall be immediately reported to the regulator in accordance with legislation. No work shall commence in the vicinity of the find until any required approvals have been given by the regulator.
Acoustics	Noise and vibration impacts to nearby commercial premises during construction and operation.	 The following acoustic screen fencing is proposed to mitigate noise emissions from site operations to neighbouring existing and proposed new industrial premises: retain the existing acoustic screen fencing at a height of 4m, which is currently erected around the existing site northern and western boundary and along existing driveways as shown on the site drawings; and proposed new metal/colorbond and electric fence along the new eastern boundary shall be an acoustic screen fencing of 4m height In addition to the above, the noise screen will be designed with regard to the following: the extent of noise reduction required of the noise screen as a whole as perceived from any potentially

Issue	Potential Impact	Mitigation/ Management Measure
		affected receiver sites;
		 any penetrations through the fabric of the noise screen will be sealed air tight;
		all joints between noise screen panels will be sealed air tight; and
		 noise screens will have no clearance gaps underneath them.
Air Quality	Potential localised air quality impacts	The following mitigation measures will be implemented to manage potential localised air quality impacts during
	associated with increased concentrations of	construction and operation:
	TSP at nearby commercial and residential	 vehicles and equipment shall be maintained in accordance with the manufacturer's specifications;
	locations.	• additional site fencing located on the eastern boundary of the site, should include appropriate dust screen to minimise airborne dust movements; and
		• all surplus soils from excavations during construction, not reused on-site, shall be removed from site by
		covered trucks and disposed of at an appropriately licensed facility.
Greenhouse Gas	Release of GHG emissions into the	Efficiency measures which will be implemented to manage GHG emissions during construction and operation
	atmosphere.	include:
		• the site will be sealed, which will reduce the emission of GHGs from the mobile materials handling
	Based on the GHG assessment undertaken	equipment due to a more consistent driving surface and the ability to select more direct routes across the site;
	indicate that GHG emissions associated	• the new site design no longer requires trucks to enter the site twice but allows for one main entrance and exit
	with the upgrade would represent an	point, reducing the kilometres travelled by trucks;
	increase of 0.006% on Australia's national	the mereupon villouding to the order enterest the content of the section of
	GHG emissions in 2010/11 of 563.1 Mt	• additional equipment purchased for the upgrade will conform to the standards of the latest technology
	CO2-e, which is considered negligible.	including installation of conveyors to move material after processing rather than by FEL or truck;
		• post-upgrade the site has an additional capacity to recover ferrous and non-ferrous materials from the
		recycling processes, decreasing the need for end users to source raw materials from the extraction industries; and
		• where possible, the site will strive to continually improve the energy efficiency of its process and operations
		by implementing electricity and cost saving measures.

Issue	Potential Impact	Mitigation/ Management Measure
Issue Soil and Water	Potential Impact Potential impacts include: accidental release/spillage of contaminants and wastewater generated on-site; earthworks resulting in potential erosional impacts; and impacts to water balance as a result of the expansion	To manage and control stormwater, the following mitigation measures are proposed: • installation of two oil/water separators for the new drainage system within the existing and expanded site area; • regular cleaning of the oil/water separators should be carried out to maintain performance; • the existing network of underground stormwater pipes, inlets and oil water separators will be cleaned and, if damaged, replaced during the site refurbishment activities;
		 rehabilitate disturbed lands quickly; and maintain erosion and control measures for the duration of the project and until the site is successfully rehabilitated.
		 refuelling to occur away from drainage points, with drip trays used and spill kits available; and trade waste receptacles will be provided for the storage and disposal of all wastes generated on-site.

To minimise the use of potable water associated with the expansion of the site, the following measures should be implemented: on-going use of collected runoff in the stormwater basin for operation requirements is recommended, as long as the water is of a quality such that impacts to site infrastructure, the surrounding environment and the health and safety of employees is avoided; rainwater tanks may also be installed to utilise the runoff from roof spaces and would likely be best suited to providing water for personal use such as toilet flushing, reducing the requirement for mains supplied potable water; landscaped areas along the south boundary will include a range of locally endemic species to enhance the environment resulting from exposure to historical contamination during ground intrusive works. Potential risks to human health and the environment resulting from exposure to historical contamination during ground intrusive works. Potential risks to human health and the environment resulting from exposure to historical contamination during ground intrusive works. Potential risks to human health and the environment resulting from exposure to historical contamination during ground intrusive works. Potential risks to human health and the environment measures will be employed to manage potential exposure to contamination fire following management measures will be employed to manage potential exposure to contamination finds should be incorporated in the Construction Environmental Management Plan (CEMP) for the planned redevelopment of both properties; if localised contaminated soils are encountered during construction works, further investigation in the form of a Phase 1/2 Environmental Site Investigation (ESA) may be required; any imported fill must be certified at source location (e.g. quarry or property owner) as Excavated Natural Material (VENM) in accordance with the Protection of the Environment Operations Act 1997 (POEO Act); and a Hazardous Materials Register and respective Safety Data Sheets (SDSs	Issue	Potential Impact	Mitigation/ Management Measure
regularly maintained. In relation to the management of oil, lubricants and other material during operations hammermill operations,		Potential risks to human health and the environment resulting from exposure to historical contamination during ground	To minimise the use of potable water associated with the expansion of the site, the following measures should be implemented: on-going use of collected runoff in the stormwater basin for operation requirements is recommended, as long as the water is of a quality such that impacts to site infrastructure, the surrounding environment and the health and safety of employees is avoided; rainwater tanks may also be installed to utilise the runoff from roof spaces and would likely be best suited to providing water for personal use such as toilet flushing, reducing the requirement for mains supplied potable water.; landscaped areas along the south boundary will include a range of locally endemic species to enhance the portion of the riparian corridor inside the operational boundary of the redeveloped site. The following management measures will be employed to manage potential exposure to contaminants during construction and operation: a contingency for the appropriate management of potential unexpected contamination finds should be incorporated in the Construction Environmental Management Plan (CEMP) for the planned redevelopment of both properties; if localised contaminated soils are encountered during construction works, they shall be segregated and assessed for waste classification and appropriately disposed of or re-used onsite, subject to the results of testing; if significant contamination is encountered during construction works, further investigation in the form of a Phase 1/2 Environmental Site Investigation (ESA) may be required; any imported fill must be certified at source location (e.g. quarry or property owner) as Excavated Natural Material (ENM) or Virgin Excavated Natural Material (VENM) in accordance with the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment (Waste) Regulation 2005 (POEO Waste Regulation); all pollution incidents that threaten or harm the environment Operations Act 1997 (POEO Act); and
• vehicles are to be adequately drained prior to coming on the site, if possible, to minimise the			 all pollution incidents that threaten or harm the environment shall be reported immediately to relevant authorities in accordance with the Protection of the Environment Operations Act 1997 (POEO Act); and a Hazardous Materials Register and respective Safety Data Sheets (SDSs) shall be kept on site at all times and regularly maintained. In relation to the management of oil, lubricants and other material during operations hammermill operations, the following management measures will be applied:

Issue	Potential Impact	Mitigation/ Management Measure
		 vehicle; immediately after receiving a car on-site it should be confirmed that the fluid containing components have been drained/removed and that no leaks are present. If fluid containing components remain or leaks identified place drip trays and seal leaking pipes; vehicle processing area is to be bunded to provide additional protection in the event of spills or overflows; clean up spills within in the bunded area (and across the site more broadly) immediately to prevent interaction with water; ensure all fluids drained from vehicles are stored in appropriate, labelled containers to avoid the potential for cross contamination; always use funnels when transferring fluids to limit the potential for spillage; flock management – if vehicles (and other scrap metals) still contain hydrocarbons or other contaminants there is potential for contamination of the flock. Ensure that it is stored on hardstand, roofed location, with bunding to prevent entry of rainwater and upslope runoff; remove batteries and battery cable ends (that are often also constructed from lead); fuel filters to be removed and stored in a leak proof container; separate other fluids such as brake fluids, coolants, air conditioning fluid, window washing fluid, prior to recycling the vehicle; and spill kits to be stored and maintained in the car handling location.
Hazards and Risks	Potential off-site impacts include fatality, human injury or damage to property caused from activities undertaken at the site.	 4332-2004, Table 7.2). This is based upon the 3,000 L of oxygen in the store. provide one powder type extinguisher and one foam extinguisher for all bulk class 3 dangerous goods on site. This includes the storage of fuel and oil removed from vehicles prior to shredding. This recommendation assumes the recovered liquids are stored in intermediate bulk containers. maintain the height of the floc stockpile to less than 4 m, or the total volume to less than 1000 m3. This ensures the warehouse in which the floc is stored will not be a high hazard occupancy. continue with the practice of providing water cannons to provide reach to feed and processed stockpiles in
Fire and Incident	Floc material has been identified as a potential source of fire. Any uncontrolled leaks or spills have the	the event of a fire in any stockpile. The recommendations made in regards to fire protection requirements as detailed above will be implemented. To ensure incidents such as accidental spills and / or leakages from machinery are contained and managed appropriately, the following measures will be implemented.

Issue	Potential Impact	Mitigation/ Management Measure
	potential to contaminate soils within unsealed sections of the site, or be entrained in stormwater flow to the detention basin at the rear of the site. Overflow of potentially contaminated water from the detention basin, has the potential to detrimentally impact on Breakfast Creek.	 detention basin has a capacity of 1440 m3. This basin will be required to be managed in accordance with the measures identified in Section 6.6). spill kits will be available on-site and be deployed to manage and contain minor spills; all pollution incidents that threaten or harm the environment shall be reported immediately to relevant authorities in accordance with POEO Act.
Traffic and Transport	Compared against the existing traffic volumes in the vicinity of the site, the additional traffic generated by the proposed development is considered negligible and is not be expected to compromise the safety or function of the surrounding road network.	
Social and Economic Resources	overall positive impact to the local	 The following measures should be implemented to ensure positive socio-economic impacts of the proposed developed are maximised: seek to utilise local available labour force when recruiting for additional employees, including where possible those that have been affected by job losses at the Dexion site; where possible, investigate opportunities for offering apprenticeships for new work force and offer additional training to current workforce; communicate to local business and community the expected start date of construction; and any complaints received relating to site operations are to be recorded and attended to promptly.
Visual Amenity	The proposed development will not result in significant visual impacts in the vicinity of the site or neighbouring areas	 Whilst visual amenity impacts associated with the proposed development are considered negligible the following management measure will be implemented: native trees, shrubs and grass species will be planted along site boundaries, particularly the frontage with Tattersall Road, which will complement and enhance existing landscaped vegetation in accordance with the Landscape Concept Plan provided in Annex M.
Waste Management	Potential impacts include: • excessive waste being directed to	• all waste transported to and removed from the site should be done so in accordance with road and transportation legislation;

Issue	Potential Impact	Mitigation/ Management Measure
	landfill; various types of waste being generated and stored onsite, with the potential for misclassification; contaminated waste not being correctly stored or disposed; off-site impacts to soil and/or water and/or groundwater.	 in all cases, appropriately licenced transport contractors are to be engaged to transport waste material to and from the site. The contractors appointed to transport waste are to ensure they: are licenced to transport the type of waste they receive; transport the waste to a licenced facility capable of receiving the type of waste and quantity they are carrying; waste is adequately covered during transport; and the contractor transporting the waste is to ensure that completed waste data forms are provided to the waste facility upon arrival the designated site manager or an appointed responsible delegate should prepare monthly reports clearly documenting the waste that has been received and generated. These should be prepared using waste receipts that have been retained and should include: waste classification data to assess compliance with the DECCW (2009) Waste Classification Guidelines; a review of licences held by the facilities where waste has been disposed to assess/ ensure their ability to accept the waste in accordance with relevant legislation; and include any incident reports relating to waste (i.e. spills) which have occurred over that month. Any corrective actions undertaken should also be included. all waste materials which meet the specification to be reused/ recycled will be processed on-site or be taken to an approved facility, capable of accepting those materials. all other waste is to be disposed in accordance with the classification of the waste material at an approved licenced facility.

Modification of Development Consent

Section 96(1A) of the Environmental Planning and Assessment Act 1979

As delegate for the Minister for Planning, under delegation executed on 16 February 2015, I approve the modification of the development consent referred to in Schedule 1, subject to the conditions outlined in Schedule 2.

Puleto

Chris Ritchie Director

Industry Assessments

Sydney 6 JULY

2017

SCHEDULE 1

Application No:

SSD 5041

Applicant:

Sell and Parker Pty Ltd

Consent Authority:

Minister for Planning

Development:

Increasing the processing capacity of the existing metal recycling facility, including reconfiguration and expansion of the facility into the adjoining site at

23-43 Tatersall Road, Kings Park.

Date of Original Consent:

12 November 2015

Modification:

SSD 5041 MOD 1 – the modification includes amendments to the site layout, design of buildings and structures and alterations and additions to existing

buildings and structures

SCHEDULE 2

This consent is modified as follows:

In Schedule 1

1. In the table of definitions, insert the following definitions in alphabetical order:

Expanded Operations

The point at which the site receives or processes in excess of 90,000 tonnes per

calendar year of waste

FRNSW

Fire and Rescue New South Wales

NCC

National Construction Code

Waste

As defined in the POEO Act

In Schedule 2

2. Delete and replace Condition A2 as follows:

A2. The Applicant shall carry out the Development in accordance with the:

(a) EIS prepared by ERM dated July 2014;

- (b) Response to Submissions report prepared by ERM dated 7 January 2015;
- (c) Supplementary Response to Submissions prepared by Mecone dated 30 June 2015;
- (d) Supplementary Response to Submissions prepared by Sell and Parker Pty Ltd dated 3 September 2015;

(e) Site layout plans and drawings (See Appendix A);

(f) Management and Mitigation Measures (see Appendix B);

- (g) Modification Application SSD 5041 MOD 1 and accompanying document titled Statement of Environmental Effects 23-43 and 45 Tattersall Road, Kings Park dated August 2016 prepared by Higgins Planning, additional information from Higgins Planning dated 22 December 2016 and further additional information from Allens and Linklaters dated 9 February 2017.
- 3. Insert Condition B35A as follows:

B35A. Prior to:

- (I) expanded operations;
- (II) the issue of an Occupation Certificate; or
- (III) the date being 4 months after the determination of MOD 1,

(whichever is sooner), the Applicant must ensure that an appropriate sprinkler system and smoke detection system have been installed within the floc storage area in Building C, to the satisfaction of FRNSW.

4. Insert Condition B35B as follows:

B35B Prior to:

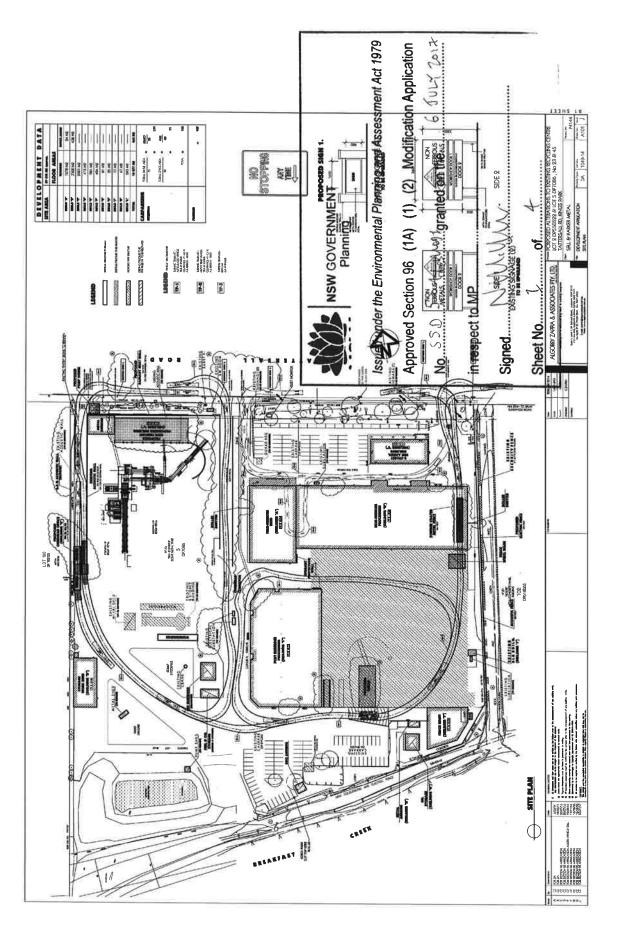
- (I) expanded operations:
- (II) the issue of an Occupation Certificate; or
- (III) the date being 4 months after the determination of MOD 1,

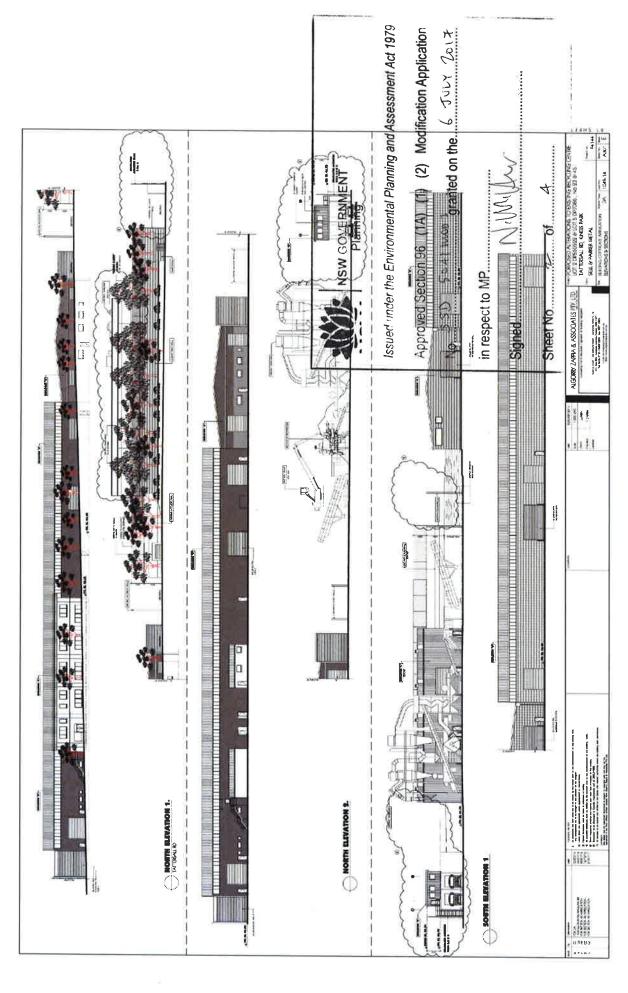
(whichever is sooner), the Applicant must ensure that all fire safety measures required by the NCC for Buildings A, B, & C have been installed and verified through a Fire Safety Audit in accordance with *Australian Standard 4655 - Fire Safety Audits*, to the satisfaction of FRNSW.

Delete Condition B19(viii) and replace as follows:

- (viii) installation of appropriate dust screens at the property boundary and replacement of existing dust screens and shade cloths at the Tattersall Road boundary of the 45 Tattersall Road site.
- 5. Replace all drawings in Appendix A with the following:

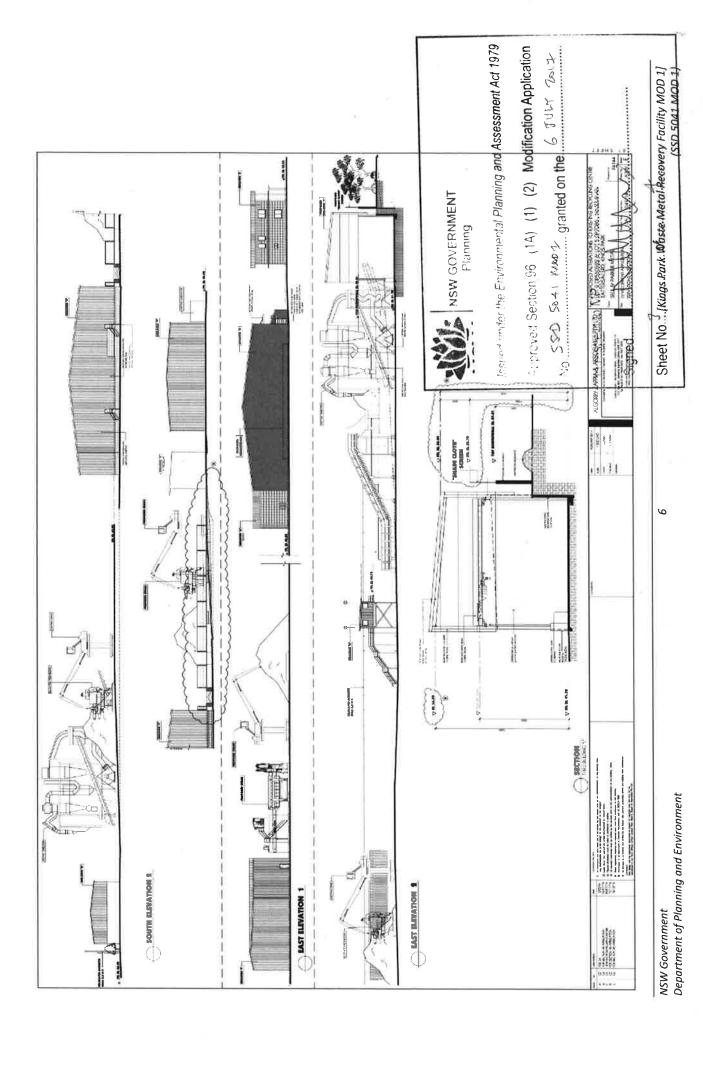
APPENDIX A: SITE LAYOUT PLANS

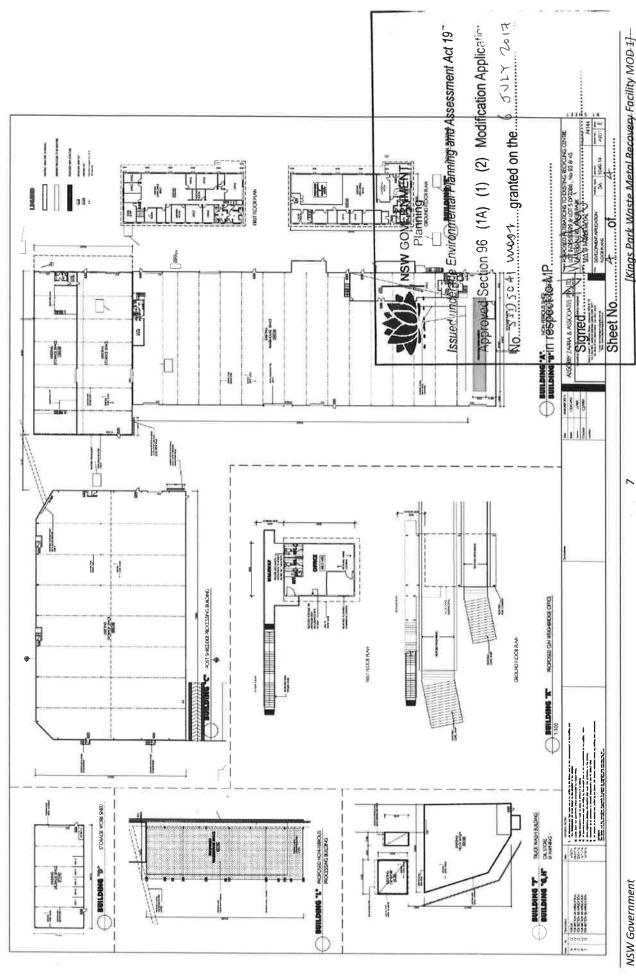




Department of Planning and Environment

NSW Government





NSW Government Department of Planning and Environment

(SSD 5041 MOD 1)

Modification of Development Consent

Section 96(1A) of the Environmental Planning and Assessment Act 1979

As delegate for the Minister for Planning, under delegation executed on 11 October 2017, I approve the modification of the development consent referred to in Schedule 1, subject to the conditions outlined in Schedule 2.

> Chris Ritchie **Director**

Industry Assessments

Sydney 26_FEBRUARY 2018

File: EF18/663

SCHEDULE 1

Application No: SSD 5041

Sell and Parker Pty Ltd Applicant:

Consent Authority: Minister for Planning

Development: Increasing the processing capacity of the existing metal recycling facility,

including reconfiguration and expansion of the facility into the adjoining site at

23-43 Tattersall Road, Kings Park.

Date of Original Consent: 12 November 2015

Modification: SSD 5041 MOD 2 - minor amendments to the western acoustic wall, entry

weighbridge arrangements and alterations and additions to existing buildings

and structures.

SCHEDULE 2

This consent is modified as follows:

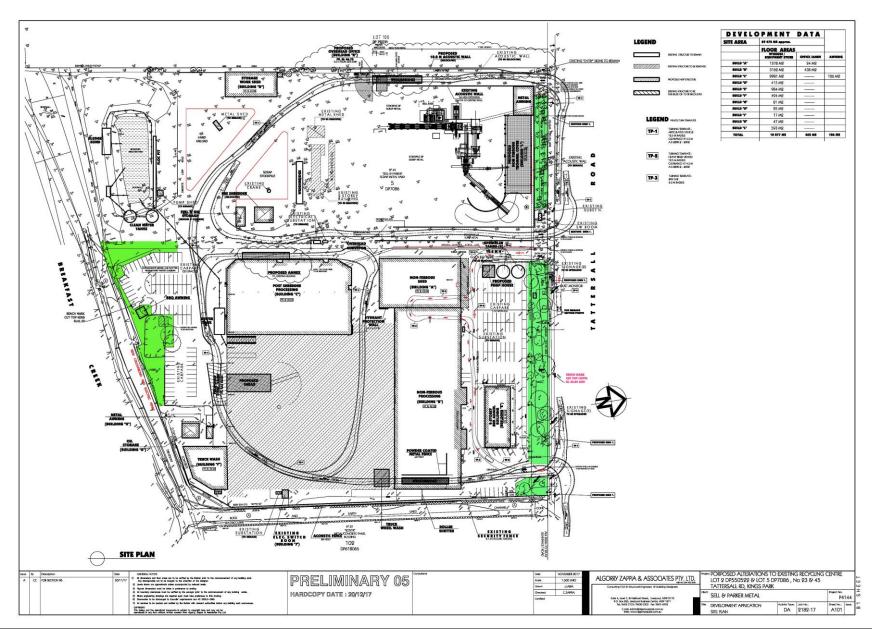
In Schedule 2

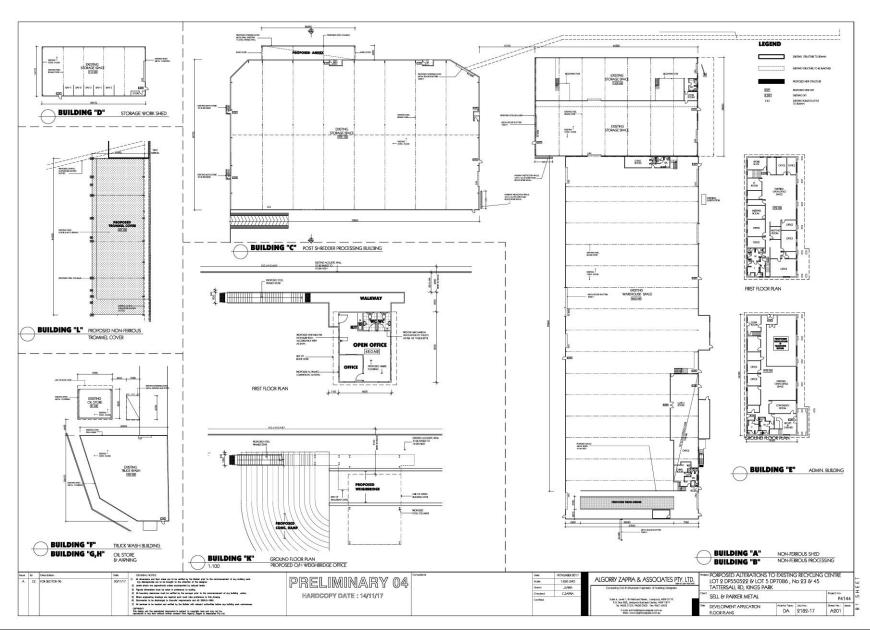
- 1. Delete Condition A2 and replace with the following:
 - A2. The Applicant shall carry out the Development in accordance with the:
 - (a) EIS prepared by ERM dated July 2014;
 - (b) Response to Submissions report prepared by ERM dated 7 January 2015;
 - (c) Supplementary Response to Submissions prepared by Mecone dated 30 June 2015;
 - (d) Supplementary Response to Submissions prepared by Sell and Parker Pty Ltd dated 3 September 2015;
 - (e) Site layout plans and drawings (See Appendix A);
 - (f) Management and Mitigation Measures (see Appendix B);
 - (g) Modification Application SSD 5041 MOD 1 and accompanying document titled *Statement of Environmental Effects 23-43 and 45 Tattersall Road, Kings Park* dated August 2016 prepared by Higgins Planning, additional information from Higgins Planning dated 22 December 2016 and further additional information from Allens and Linklaters dated 9 February 2017; and
 - (h) Modification Application SSD 5041 MOD 2 and accompanying document titled Statement of Environmental Effects 23-43 and 45 Tattersall Road, Kings Park dated December 2017 prepared by Higgins Planning.
- 2. Insert new Condition B35C immediately after Condition B35B as follows:
 - B35C. Prior to the issue of an occupation certificate for the awning annex adjacent to Building C, the Applicant must ensure that an appropriate sprinkler system has been installed within the awning annex, to the satisfaction of FRNSW.

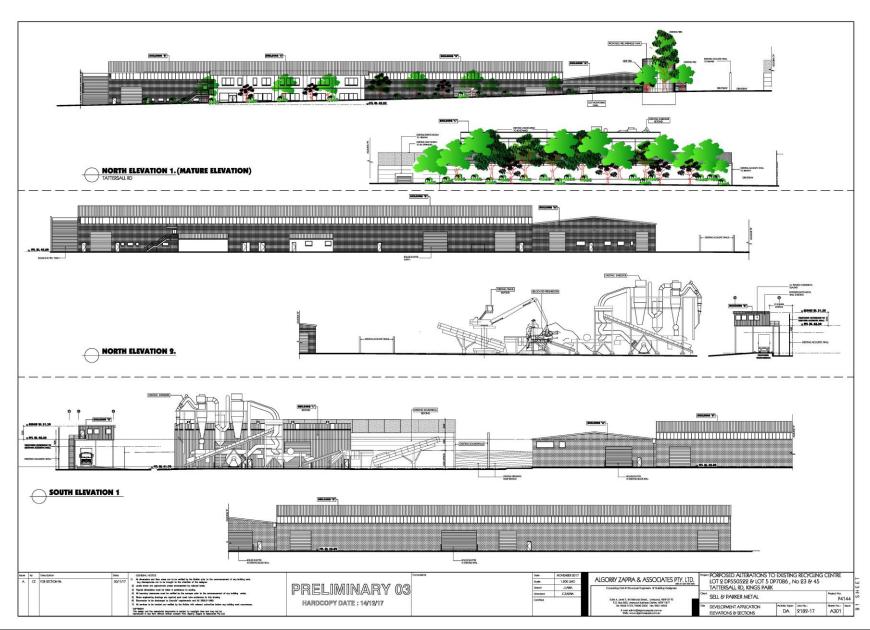
In the Appendices

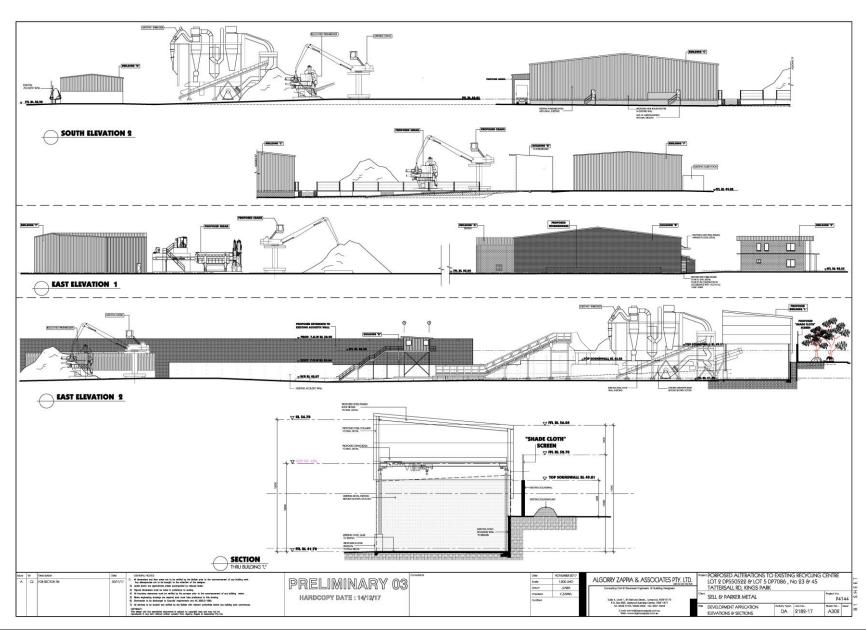
3. Delete Appendix A and replace with the following:

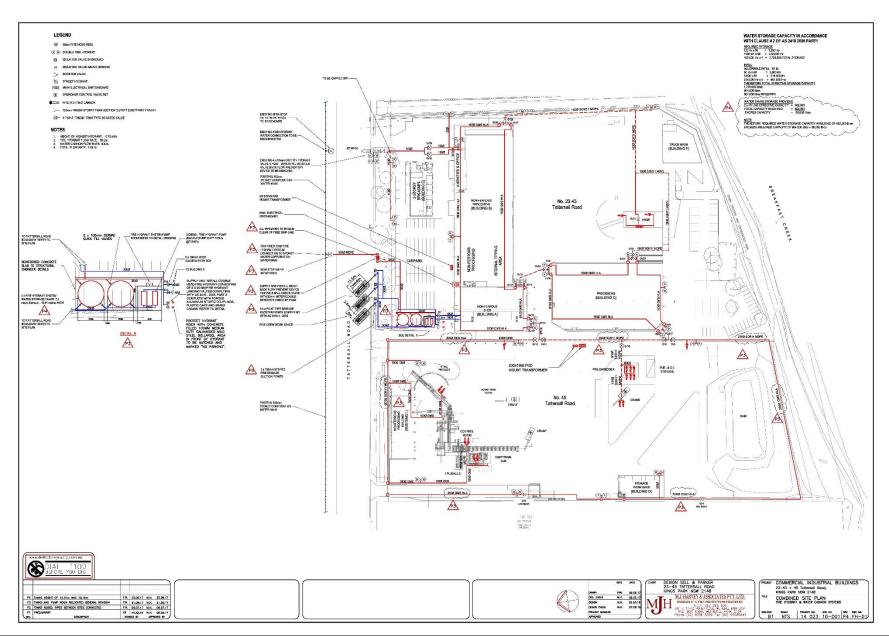
APPENDIX A: SITE LAYOUT AND PLANS











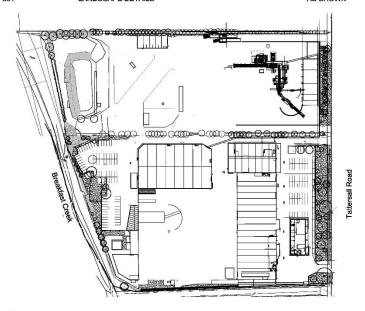
PROPOSED ALTERATIONS TO EXISTING RECYCLING CENTRE

23-43 & 45 TATTERSAL RD, KINGS PARK

LANDSCAPE

DRAWINGS

DWG NO.	DRAWING TITLE	SCALE
000	COVERSHEET	N/A
101	LANDSCAPE MASTERPLAN	1:500
401	LANDSCAPE PLAN	1:250
402	LANDSCAPE PLAN	1:250
403	LANDSCAPE PLAN	1:250
404	LANDSCAPE PLAN	1:250
501	LANDSCAPE DETAILS	AS SHOW



NOT FOR CONSTRUCTION

D 2016 Sim Image (1894) Pt Ltd ARM 44 601 128 380 as agent for bits mape ARM Permissips. Air rights reason() Their dusting it copyright on shall not be repost, and or created in any form only any revenue (proprior, accidence) and control or an extension or an extension or an extension of the image (ASM) Pty Ltd Arg (Issuess, expressed or Immissible, to Los the Country of the Image (ASM) Pty Ltd Arg (Issuess, expressed or Immissible, to Los the Immissible Country of the Immissibl

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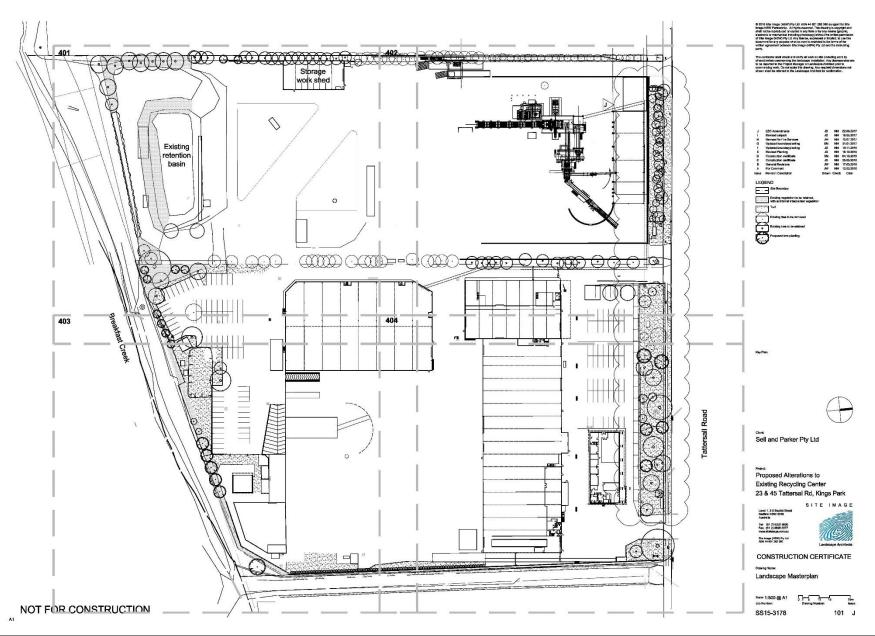
Sell and Parker Pty Ltd

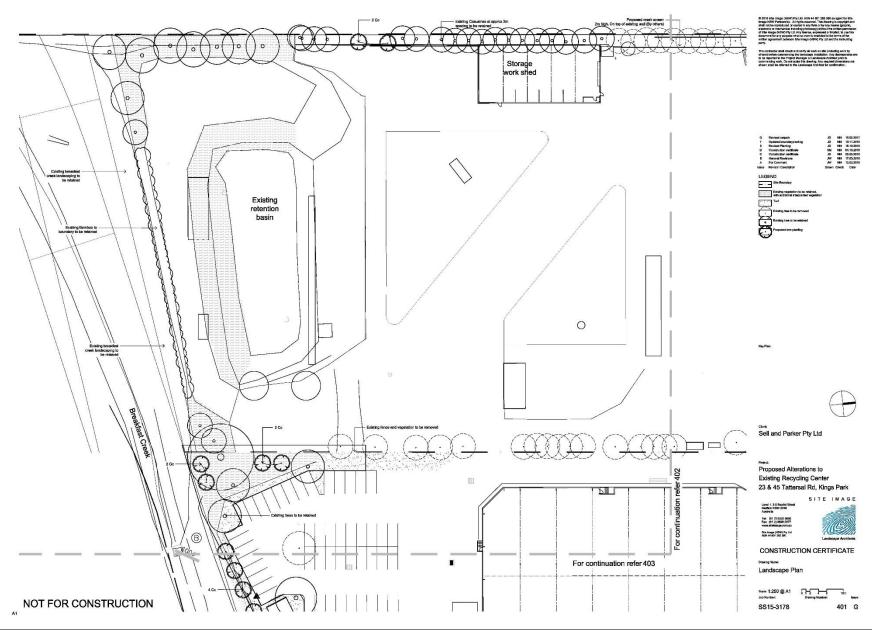
Proposed Alterations to
Existing Recycling Center
23 & 45 Tattersal Rd, Kings Park

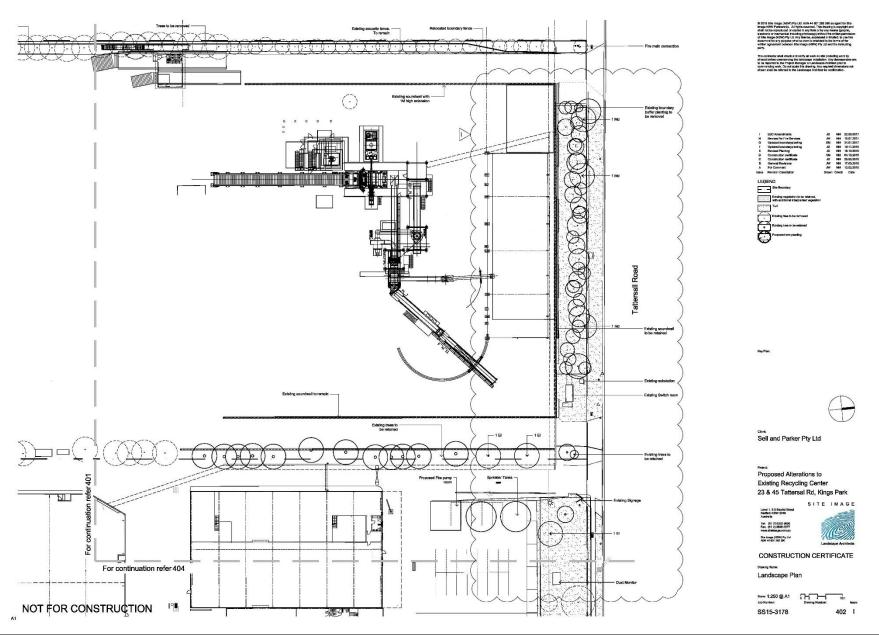
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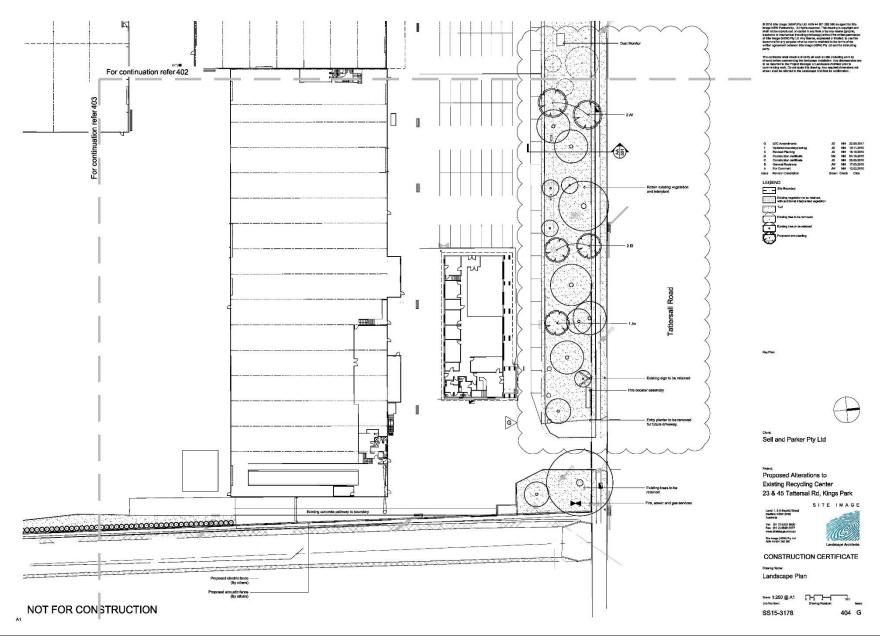
CONSTRUCTION CERTIFICATE

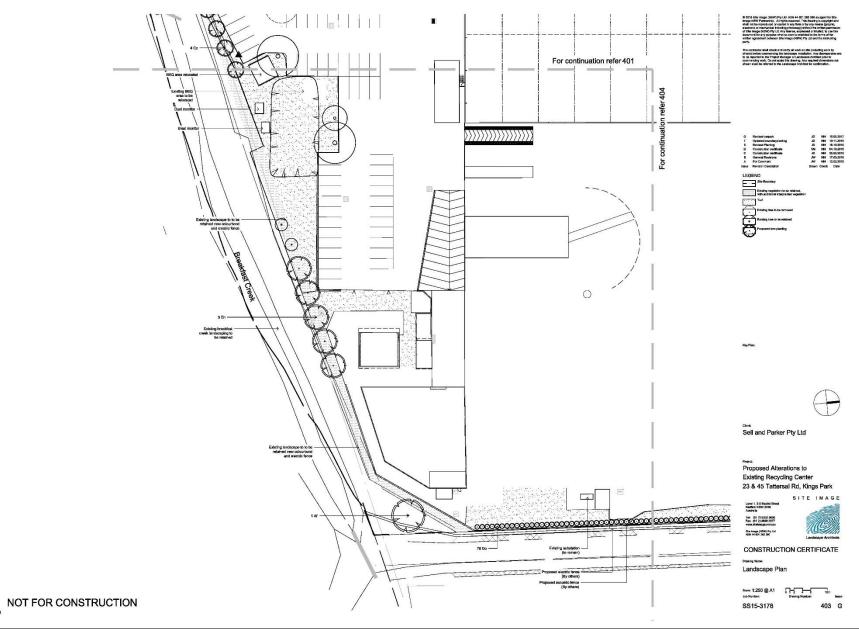
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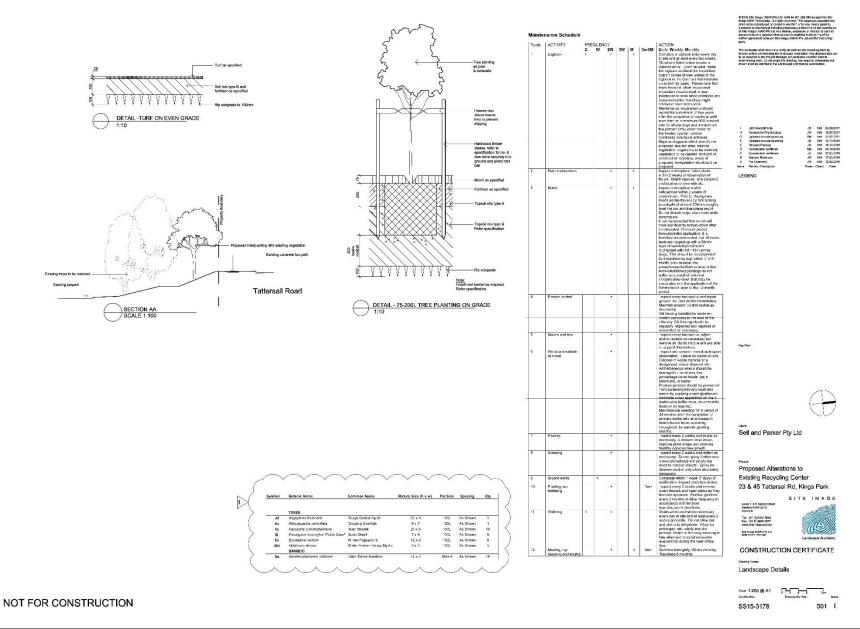






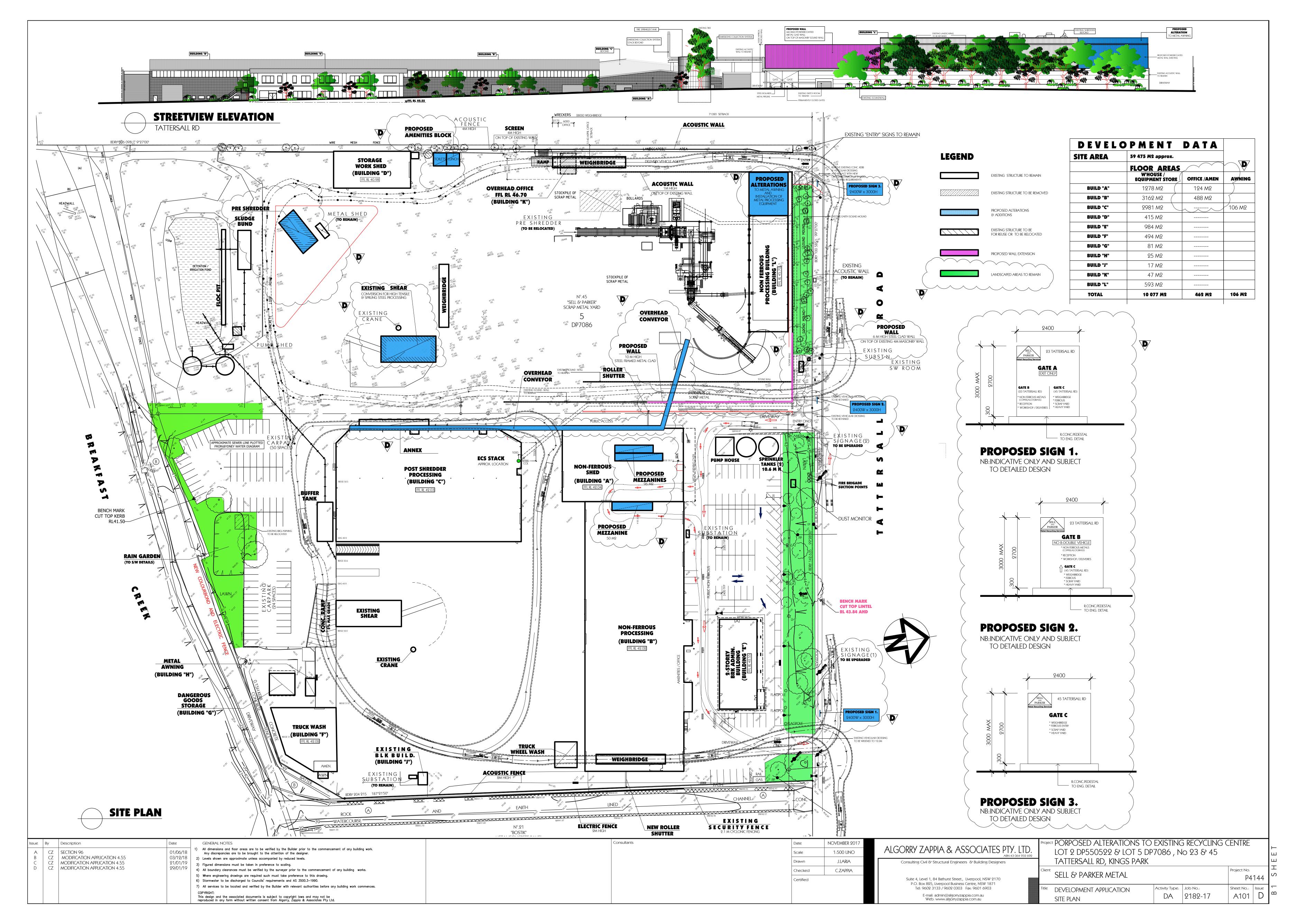


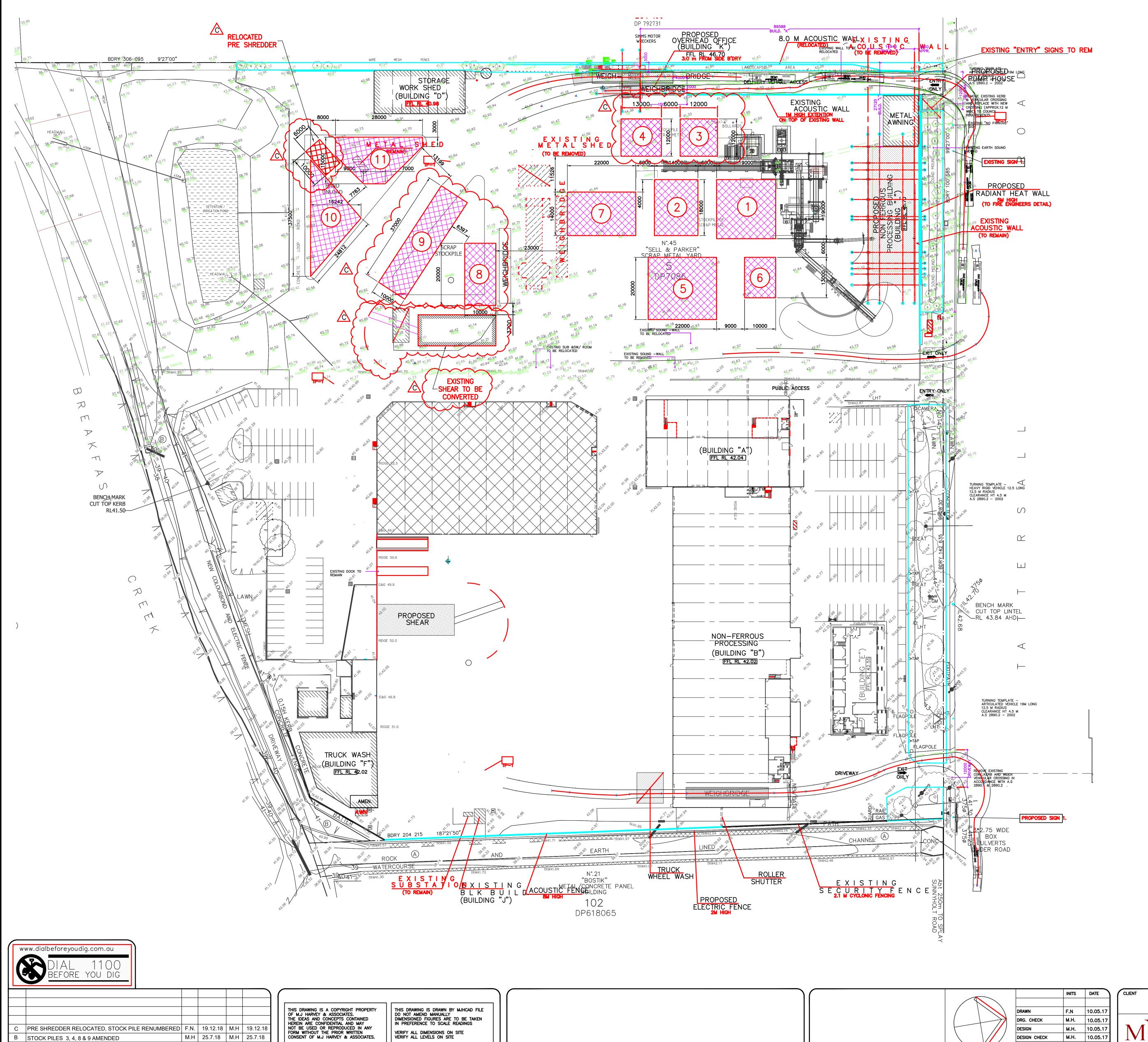




APPENDIX B

Engineering Plans





VERIFY ALL DIMENSIONS ON SITE VERIFY ALL LEVELS ON SITE

PRE SHREDDER RELOCATED, STOCK PILE RENUMBERED | F.N. | 19.12.18 | M.H | 19.12.18

DESCRIPTION

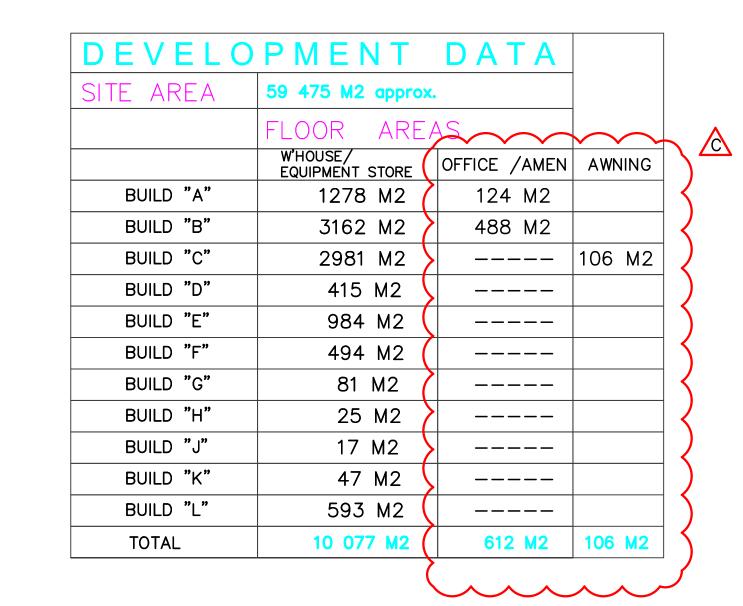
B STOCK PILES 3, 4, 8 & 9 AMENDED

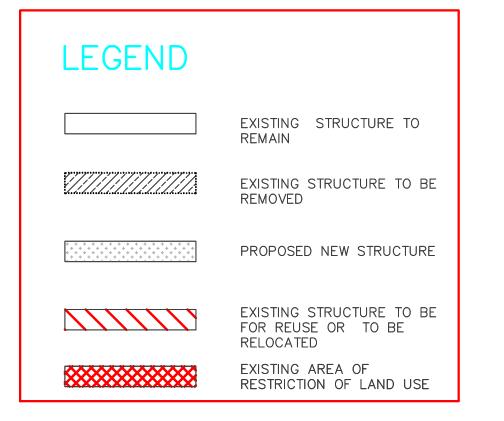
A FRNSW SUBMISSION

| M.H | 25.7.18 | M.H | 25.7.18

F.N. | 10.05.17 | M.H. | 11.05.17

REVISED BY APPROVED BY

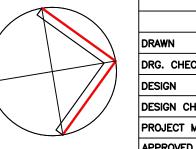




STOCK PILE NOTES

- 1. MIN 6m ACCESS AROUND STOCK PILES
- 2. NOT ALL STOCK PILES WILL BE FULLY
- OPERATIONAL OR UTILISED AT THE SAME TIME 3. DIMENSIONS INDICATED ARE APPROXIMATE ONLY

Pile Number	Туре	Average Height	Size
		m	Cubic M
1	Inspected Shredder Feed	4	1444
2	Inspected Shredder Feed	4	1008
3	Inspected Shredder Feed	4	576
4	As delivered shredder Feed	4	624
5	As delivered shredder Feed	4	1760
6	As delivered shredder Feed	4	520
7	As delivered shredder Feed	4	1288
8	Automotive	4	800
9	Automotive	4	1480
10	Preshredded Automotive	4	1224
11	Preshredded Automotive	4	1200
	total		11924
9	Automotive Preshredded Automotive Preshredded Automotive	4	1480 1224 1200



M.H. 10.05.17 DRG. CHECK M.H. 10.05.17 DESIGN CHECK M.H. 10.05.17 PROJECT MANAGER APPROVED

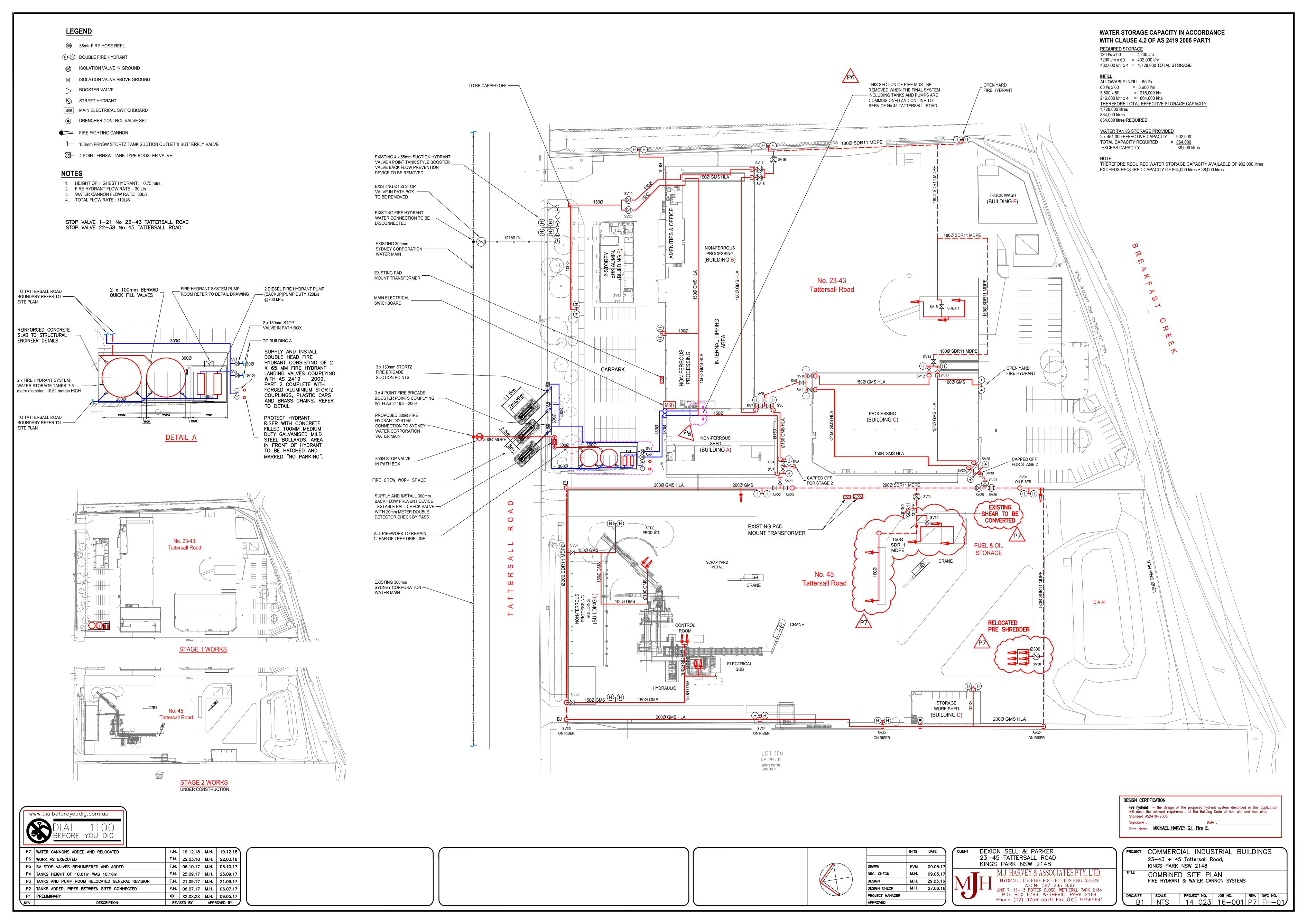
SELL & PARKER PTY LTD 23-45 TATTERSALL ROAD KINGS PARK NSW 2148 M.J. HARVEY & ASSOCIATES PTY. LTD. HYDRAULIC & FIRE PROTECTION ENGINEERS A.C.N. 067 295 836 UNIT 7, 11-13 POTTER CLOSE, WETHERILL PARK 2164 P.O. BOX 6389, WETHERILL PARK 2164 Phone (02) 9756 5579 Fax (02) 9756 5641

PROJECT PROPOSED FIRE SAFETY UPGRADE 45 Tattersall Road, KINGS PARK NSW 2148 PLAN PROPOSED STOCK PILE SITE PLAN AND DATA DRG.SIZE SCALE PROJECT NO. JOB NO. REV. DWG NO.

B1 | 1:500 | 14 023 | 16-001 | C | SP-01

APPENDIX C

Fire Management Plans and Assessment





M.J. HARVEY & ASSOCIATES PTY. LTD.

HYDRAULIC & FIRE PROTECTION ENGINEERS

ABN 87 067 295 836

Department of Planning & Environment **Industry Assessments** GPO Box 39 Sydney NSW 2001

Date: 19 December 2018

Project No: 14 023 Job No:

16-001

Dear Sir / Madam

Your Ref. SSD 5041 Modification No.3 Re: Kings Park Metal Recovery Processing and Recycling Facility 23-43 & 45 Tattersall Road Kings Park

We refer to the attached Hydraulic drawings 14023 FH-01 and Stock pile plan drawing No.14023 SP-01 Rev C and FH-01 Rev. P7 indicating the proposed changes to the site operation.

Changes to the Original Approval as part of the Modification Proposal include:

- Installation of a metal awning and processing equipment
- Changes to fencing and signage
- Installation of offices and amenities within Building A and Building B
- Installation of offices with the yard area
- Relocation of the pre-shredder
- Minor realignment of the conveyor
- Extension of operational hours
- Administrative changes

A summary of the works included within the Modification Proposal are as follows:

- Metal awning and processing equipment
 - Increase in height and enclosing of the Metal awning and installation of metal processing equipment
- Fencing and signage
 - Extension of existing fencing along the Tattersall Road frontage and at entrances to the site
 - Installation of directional signage at the entrances to the site
- Building A and Building B offices
 - Installation of additional elevated offices and amenities (within the buildings)
- Offices (western boundary)
 - Installation of elevated office and amenities within yard area (to the north of Building D)
- Existing shear conversion
 - Existing shear to remain in the current location and converted into a machine capable of processing high tensile/pre-stressed metal.

- Pre-shredder relocation
 - Relocation of the pre-shredder from the approved location further south west, to the area identified as the 'hand unload area'
 - Relocation of 'hand unload' operations to Building B.
- · Conveyor minor realignment
 - Minor realignment of the conveyor to follow the building line (on the roof) of Building C.
- Extension of hours
 - Operational hours (no public access or resource recovery processing) would be extended to allow cleaning and maintenance activities from 9pm to 6am Monday – Saturday and 24 hours on Sunday.
- Administrative changes

The fire hydrant system and Water canon system will be modified in accordance with the attached drawings therefore the fire safety of the site will not be adversely affected by the proposed changes.

We trust this meets your approval, however, should you wish to discuss the matter further or require additional information, please contact the undersigned.

Yours faithfully

Michael Harvey

Adv Cert Fire Tech, G.I. Fire.E, Associate Dip Hyd Eng.

11/1

APPENDIX D

Air Quality Impact Assessment



Level 6 99 King Street Melbourne VIC 3000 PO BOX 266 Australia VIC 3205 Telephone: +61 3 9696 8011 Fax: +61 3 9696 8022

www.erm.com

Howard Richards Environment Manager Sell & Parker Pty Ltd Via email ERM

19 December 2018

Reference: 0462777LVO7

Dear Howard,

Subject: Air Quality Impacts Screening for Site Modifications at Kings Park Metal Recycling Facility

Sell & Parker Pty Ltd (Sell & Parker) is seeking to undertake modifications at the Kings Park Metal Recycling Facility ("Site") to improve the operational efficiency, as well as improving safety and environmental aspects of the Site.

The improvements are required to respond to a change in market conditions and policy in the waste recycling industry. Approval is sought for this modification to Development Consent SSD 5041 under Section 4.55 (1A) of the Environmental Planning and Assessment Act.

Environmental Resources Management Pty Ltd (ERM) has been commissioned by Sell & Parker to assess whether the proposed modifications are likely to result in any material difference to air quality impacts upon sensitive receptors, as predicted in the September 2015 Air Quality Assessment ("2015 Study") for the Site undertaken by ERM (ERM, 2015).

1 Scope of the modifications

A summary of the works included within the Modification Proposal is as follows:

- Metal awning and processing equipment:
 - Increase in height and enclosing of the Metal awning and installation of metal processing equipment;
- Fencing and signage:
 - Extension of existing fencing along the Tattersall Road frontage and at entrances to the site;
 - Installation of directional signage at the entrances to the site;
- Building A and Building B offices:
 - Installation of additional elevated offices and amenities (within the buildings);
- Offices (western boundary):
 - Installation of elevated office and amenities within yard area (to the north of Building D);
- Existing shear conversion:
 - Existing shear to remain in the current location and converted into a machine capable of processing high tensile/pre-stressed metal;
- Pre-shredder relocation:

Page 1 of 8

- Relocation of the pre-shredder from the approved location further south west, to the area identified as the 'hand unload area';
- Relocation of 'hand unload' operations to Building B;
- Conveyor minor realignment:
 - Minor realignment of the conveyor to follow the building line (on the roof) of Building
 C:
- Extension of hours:
 - Operational hours (no public access or resource recovery processing) would be extended to allow cleaning and maintenance activities from 9pm to 6am Monday – Saturday and 24 hours on Sunday; and
- Administrative changes.

Appendix A provides the site layout where these proposed modifications will take place. It is noted that these proposed modifications will not alter the current operating hours (with the exception of cleaning and maintenance, i.e. no change to resource recovery activities or public access) approved in the SSD 5041 or the approved annual throughput of 350,000 tonnes.

2 Assessment of potential air quality impacts from construction

2.1 Overview of construction activities

During the construction phase of the proposed modifications, the key construction activities are expected to be as presented in Table 1.

Table 1 Construction activities overview

Construction element	Overview
Construction activities	 The key construction activities include the following: Construction of metal awning; Assembly of the processing equipment; Removal of existing chain link fence (and dust cover) and erection of proposed fencing; Erection of signs along the Tattersall Road frontage; Construction of offices within buildings (Building A and B) and externally (north of Building D) (either on-site or pre-fabricated); Part dismantling of the existing shear and installation of upgraded components; Dismantling of existing pre-shredder and assembly at proposed location; and Construction of altered section of the conveyor.
Program	Works would be undertaken progressively over a period of approximately 3- 12 months. Notwithstanding this, some aspects of the works may be delayed, subject to receipt of machinery and materials.
Workforce	■ The majority of construction activities would be undertaken by on-site personnel. In some instances, some contractors may be required. An addition (above the previous approval) of approximately 5 temporary contractors is anticipated over the duration of the construction works.

ERM	19 December 2018 Reference: 0462777LVO7
	Page 3 of 8

Construction element	Overview
Plant and equipment	 Generally existing active on-site plant and equipment would be utilised for the construction works. Generally, equipment would include mobile cranes, forklifts, welders and hand tools.
Traffic movements	 No additional traffic movements would be evident as a result of these activities, all movements would be accommodated within previously approved construction movements; and
	 Contractors and importation of material would utilise existing site entrances from Tattersall Road.
Laydown areas	Any laydown areas for materials would be accommodated adjacent to the works being undertaken.
Construction environmental management plan (CEMP)	 All works would be undertaken and environmental mitigation measures (as required) implemented in accordance with the CEMP that was previously prepared for the SSD 5041 approval process.

2.2 Qualitative assessment of potential air quality impacts from construction activities

Review of the construction activities, listed in Table 1, in relation to ambient air quality impact indicates the following:

- Some construction activities take place within buildings (such as the construction of offices within Buildings A and B) which minimises any emissions to the ambient environment;
- To accommodate certain modifications, related site operations would need to be ramped down while construction activities are being undertaken. For instance, the shear would need to be offline when it is being upgraded. Hence, there would be a reduction in operational activities and emissions which would, to a certain extent offset the emissions generated by construction activities:
- There is no need to create additional laydown areas for these modifications, meaning that earthworks (which tend to generate particulate matter) related to this are not needed;
- Since the majority of the construction workforce would come from the existing Site
 workforce, and on-site plant and equipment would be used during the construction activities,
 there would be no change to traffic movements as a result of the construction work;
- The construction works will take place progressively over a 3 to 12 month period. This means that emissions are correspondingly distributed over time; and
- Construction activities will be managed according to the mitigation measures (as relevant) included within the CEMP.

Based on the findings, it is considered that the construction activities associated with the proposed modifications are unlikely to result in additional air quality impacts. No further mitigation measures are considered necessary.

Page 4 of 8

3 Semi-quantitative assessment of potential air quality impacts from operation

3.1 Identification of operational activities and relevant emissions that may impact air quality

Based on the proposed modifications in Section 1, it is considered that there is potential for change in contribution to ambient air quality as a result of changes to the location and / or emission rates from:

- Addition of a new metals processing equipment in the metal awning area;
- Existing shear conversion;
- Pre-shredder relocation; and
- Conveyor realignment.

From the 2015 Study, the relevant emissions that are considered to have the potential to be affected by the addition of a new metals processing plant, as well as the modifications of the shear, pre-shredder and conveyor, relate to particulate matter, i.e. total suspended solids (TSP) and particulate matter with aerodynamic diameter of 10 microns or less (PM₁₀).

The 2015 Study found that TSP and dust deposition cumulative impacts (incremental from the Site plus the background levels where they were known) were well below their respective criteria. PM₁₀ cumulative concentrations were found in the 2015 Study to have potential for exceedances at certain nearby sensitive receptors for the short-term averaging period of 24 hours, whilst the concentrations for the annual period were below the criterion. As such, the air quality assessment for the proposed modifications in Section 1 will focus on PM₁₀ for the 24-hour averaging period.

3.2 Assessment of potential air quality impacts from operation activities

3.2.1 New metal processing equipment

The new metal processing equipment in the metal awning area is an eddy currents and sensor sorter. The sorting is done through the concept of magnetic fields through an induced electric current to sort between non-ferrous metals and other non-metals. There are no cutting and compaction activities involved. As such, there are no associated air emissions or air quality impacts due to this new metal sorter.

3.2.2 Shear modifications

The existing shear will remain in the current location as indicated in Appendix A, however the machinery will be converted to enable processing of high tensile/pre-stressed metal.

The actual composition and volume of the materials processed will not be different from what was previously assumed in the 2015 Study. As the tensile wires are smaller than heavy steels, actual volumes may actually be slightly diminished from that previously assessed.

Overall, the new shear upgrade will result in no change to the composition/volume processed or the compaction/cutting phases as compared to the 2015 Study. Furthermore, in the 2015 Study, the activities associated with shear operation (transfer of large items to the shear, the shearing process and loading of shear product onto truck for transport off-site) were all considered to be activities that would generate few emissions of particulate matter and were excluded from dispersion modelling.

19 December 2018 Reference: 0462777LVO7

Page 5 of 8

As such, it is considered that there is likely to be no material difference to the Site's air quality impacts arising from the shear modifications. No further mitigation measures are considered necessary.

3.2.3 Pre-shredder relocation

The relocation of the pre-shredder will entail moving the pre-shredder as well as the associated activities, as follows:

- Transfer of raw material from stockpile to pre-shredder (sources MH04 and MH05 as per 2015 Study);
- Transfer of pre-shredder output to a truck to convey to the inspected stockpile of scrap metal close to the conveyor (source MH06 as per 2015 Study);
- Pre-shredder drop point (source TP01 as per 2015 Study);
- Truck dumping at raw material delivery (source TRKD01 as per 2015 Study);
- Wind erosion from scrap stockpile (sources WE01 and WE02 as per 2015 Study); and
- Wind erosion from post pre-shredder stockpile 1 at pre-shredder (source WE03 as per 2015 Study).

The above sources (modelled in the ERM 2015 assessment as volume sources) are to be located to the eastern side adjacent to the pre-shredder.

Within the ERM 2015 assessment, emissions from sources was dependent on a time varying emission file that depended on amount of material processed. Impacts were assessed as surrounding sensitive receptors, and the sensitive receptor at which the highest site contribution to 24-hour PM10 concentration was modelled in the ERM 2015 assessment was known as R20 (see Appendix B for locations of the sensitive receptors). Two other receptors (R12 and R13) were also shown to have incremental impacts in the same order of magnitude as that of R20.

At the time period of the highest site contribution to ambient concentrations at receptor R20, the pre-shredder-related emissions within the assessment accounted for approximately 11% of the total predicted incremental impact at that sensitive receptor.

Dependant on the location of the receptor relative to the location of the pre-shredder, there is likely to be a reduction in concentration at the receptors to the north of the site (R12/R13/R20) and a slight increase in concentration at receptors to the south-west of the site (R17/R18/R19). If it is conservatively assumed that the increase at receptors R17/R18/R19, as a result of the movement of the pre-shredder, is equal to its percentage contribution of the site emissions (11%), the resultant concentration would remain below the air quality standard. This is due to the results from the 2015 ERM assessment at R17/R18/R19 being sufficiently below the adopted assessment standard. It is considered likely that the change in impact at this location will be less than 11%.. No further mitigation measures are considered necessary.

3.2.4 Conveyor realignment

The realignment of the conveyor to a more direct route between Building L and Building C will affect the location of the transfer points at the conveyor bends. The previous conveyor alignment has 3 transfer points, as follows:

- Transfer point at conveyor bend 1 (source TP06 as per 2015 Study);
- Transfer point at conveyor bend 2 (source TP07 as per 2015 Study); and
- Transfer point at conveyor bend 3 (source TP08 as per 2015 Study).

Page 6 of 8

At the nearest worst-case sensitive receptor to the Site as assessed in the 2015 Study (R20), emissions from conveyor transfer points as above account for approximately 1% of the total predicted incremental impact at that sensitive receptor. Based on this low percentage and the realignment of the conveyor transfer points further away from the site boundary, it is likely that there may be some reduction in incremental ground level concentrations on modelled receptors but the magnitude of change is not anticipated to be significant due to the minor contribution of the conveyor transfer points to overall site emissions. No further mitigation measures are considered necessary.

4 Conclusion

Based on the proposed scope of modification, it is considered that there are no associated major construction activities. Certain operational changes will arise due to the proposed modifications, but none of the air quality impacts are likely to be significant. As such, further mitigation measures for the construction and operational phases are not considered necessary.

5 References

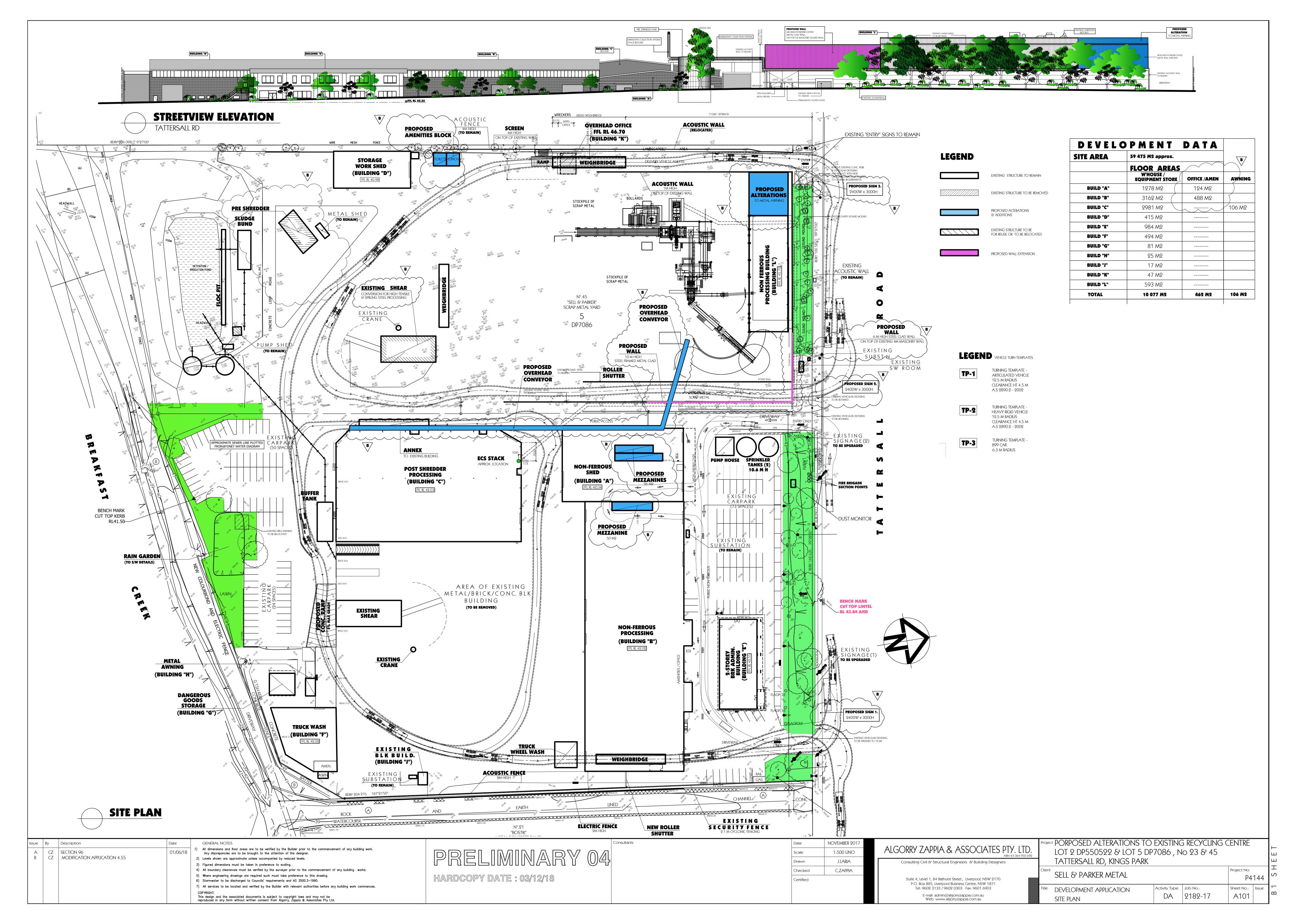
ERM. (2015). Waste Metal Recovery, Processing and Recycling Facility, 45 and 23-43 Tattersall Road, Kings Park, Blacktown - Air Quality Assessment.

Yours sincerely,

Iain Cowan
Technical Director

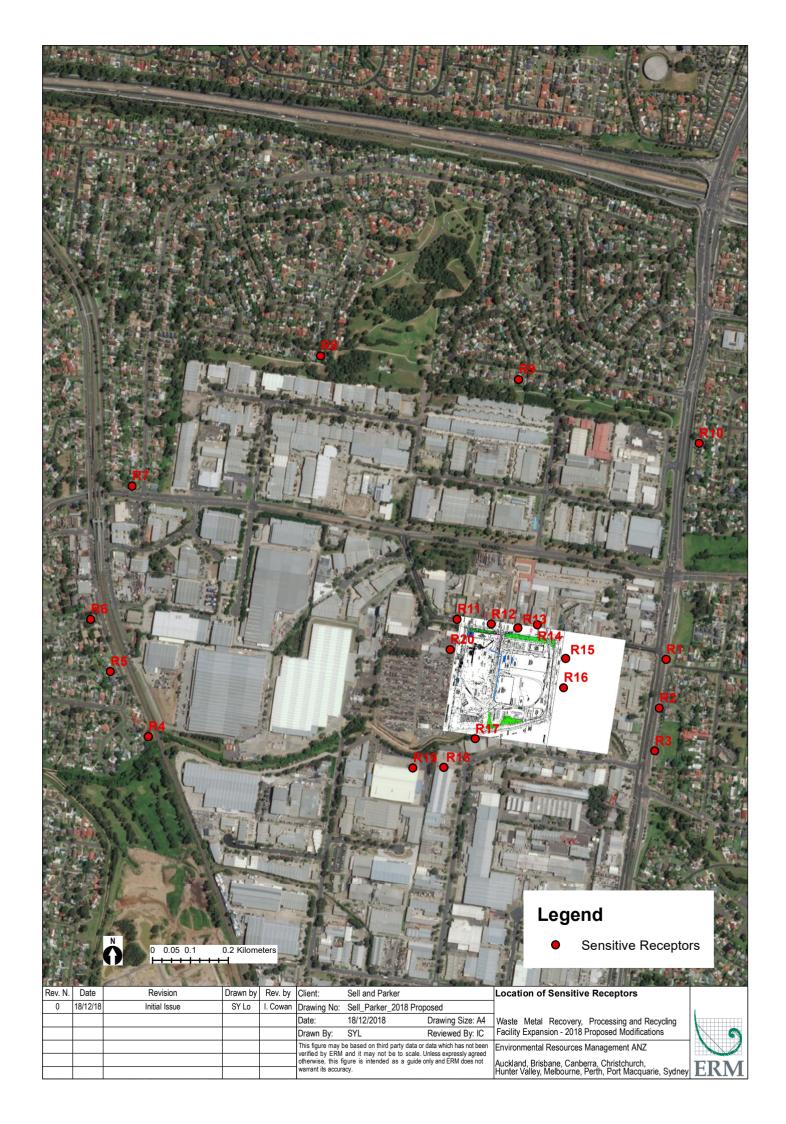
Sophie Wood Partner

APPENDIX A PROPOSED MODIFICATIONS AND THEIR LOCATIONS



APPENDIX B

LOCATIONS OF SENSITIVE RECEPTORS (FROM 2015 STUDY) IN RELATION TO PROPOSED MODIFICATIONS



APPENDIX E

Noise and Vibration Impact Assessment



KINGS PARK WASTE METAL RECOVERY PROCESSING AND RECYCLING FACILITY

Noise Impact Assessment

12 December 2018

Sell & Parker

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1 Introduction

Renzo Tonin & Associates was engaged to conduct a Noise Impact Assessment for the proposed modifications for the existing Kings Park Waste Metal Recovery, Processing and Recycling Facility located at 45 Tattersall Road, Kings Park. The purpose of this assessment is to provide an environmental noise impact assessment of the proposed maintenance and cleaning activities to be undertaken outside the currently approved hours.

The work documented in this report was carried out in accordance with the Renzo Tonin & Associates Quality Assurance System, which is based on Australian Standard / NZS ISO 9001. Appendix A contains a glossary of acoustic terms used in this report.

2 Project description

Sell & Parker currently operates the Kings Park Waste Metal Recovery, Processing and Recycling Facility at 45 Tattersall Road, Kings Park. The current operating hours for the subject site, in accordance with Condition B31 of the Development Consent (SSD 5041), are listed in the table below.

Table 2.1 - Currently approved operating hours

Activity		Day	Hours
Operation	Oxy-acetylene torch cutting	Monday – Saturday	9am to 3pm
		Sunday & Public Holidays	Nil
	All other activities	Monday – Saturday	6am to 9pm
		Sunday & Public Holidays	Nil

Sell & Parker proposes to undertake maintenance and cleaning works outside of the approved hours as follows:

• Monday – Saturday: 9pm to 6am

Sunday: 24 hours

The types of activities undertaken would include:

- <u>Maintenance</u> repair and maintenance of equipment (shredder and other operational equipment); and
- <u>Cleaning</u> hosing and washing down of equipment.

No other activities would be undertaken during these proposed hours.

3 Noise sensitive receivers and industrial receivers

The following residential receivers are potentially affected by noise from the site.

• Receiver R1 - 189 Sunnyholt Road

Residential receiver located approx. 315m east of the facility and considered representative of the nearest affected receivers along Sunnyholt Road.

Receiver R2 – 17 Camorta Close

Residential receiver located approx. 650m north of the facility and considered representative of the nearest affected receivers along Camorta Close.

Receiver R3 – 3 Railway Road

Residential receiver located approx. 830m west of the facility and considered representative of the nearest affected receivers along Railway Road.

The following lists adjacent industrial receivers:

• Receiver R4 - 38 Tattersalls Road

Industrial receiver to the north of the facility across from Tattersalls Road.

• Receiver R5 – 57-69 Tattersalls Road

Industrial receiver to the west of the facility sharing a common site boundary.

Receiver R6 – 21 Tattersalls Road

Industrial receiver to the east of the facility sharing a common site boundary.

• Receiver R7 – 38 Forge Street

Industrial receiver to the south of the facility across Breakfast Creek.

These locations are depicted in Figure 1 below.

Figure 1 - Site, noise monitoring and receiver locations



RENZO TONIN & ASSOCIATES

12 DECEMBER 2018

4 Existing acoustic environment

Criteria for the assessment of operational noise are usually derived from the existing noise environment of an area, excluding noise from the subject development.

Fact Sheet A of the NSW EPA 'Noise Policy for Industry' (NPfl) outlines two methods for determining the background noise level of an area, being 'Long-term background noise method' and 'Short-term background noise method'. This assessment has used a combination of long-term unattended and short-term attended noise monitoring.

As the noise environment of an area varies over time, background and ambient noise levels need to be determined for the operational times of the proposed development. For example, in a suburban or urban area the noise environment is typically at its minimum at 3am in the morning and at its maximum during the morning and afternoon traffic peak hours. The NPfl outlines the following standard time periods over which the background and ambient noise levels are to be determined:

- Day: 7am to 6pm Monday to Saturday and 8am to 6pm Sundays & Public Holidays
- Evening: 6pm to 10pm Monday to Sunday & Public Holidays
- Night: 10pm to 7am Monday to Saturday and 10pm to 8am Sundays & Public Holidays

4.1 Noise measurement locations

Noise measurements are ideally carried out at the nearest or most potentially affected residential locations surrounding a development. Alternatively, representative locations should be established in the case of access restrictions or a safe and secure location cannot be identified. Furthermore, representative locations may be established in the case of multiple receivers as it is usually impractical to carry out measurements at all locations surrounding a site.

The locations of the long-term unattended and short-term attended measurement are identified in Table 4.1 below and depicted in Figure 1 above.

Table 4.1 – Noise measurement locations

ID	Location	Description				
Long-term	Long-term unattended noise monitoring (provided by Environmental Resources Management Australia Pty Ltd)					
L1	1/50 Charles Street	The noise monitor was located in the 'free-field'. The noise monitoring location is considered representative of residential receiver locations along Sunnyholt Road.				
L2	2 Anthony Street	The noise monitor was located in the 'free-field'. The noise monitoring location was supplementary for residential receiver locations along Sunnyholt Road.				
Short-tern	n attended noise monitoring (Renzo	Tonin & Associates)				
S1	50 Charles Street - Kerb side	Short term attended noise measurements were conducted in the 'free field'. The noise monitoring location was selected to provide a correlation with the long term noise monitoring at Location L1.				
S2	6 Railway Road - Kerb side	Short term attended noise measurements were conducted in the 'free field'. The noise monitoring location was selected to provide a correlation between the long term noise monitoring at Location L1 to the residential receivers along Railway Road.				
S3	17 Camorta Close (southern side of southern site boundary)	Short term attended noise measurements were conducted in the 'free field'. The noise monitoring location was selected to provide a correlation between the long term noise monitoring at Location L1 to residential receivers along Camorta Close.				

It is noted that the long term unattended noise level data reported herein was provided by Environmental Resources Management Australia Pty Ltd (ERM). The original data was re-analysed for the purpose of this report according to the guidelines contained in the NPfl.

The long term unattended noise monitoring was conducted with the subject site operating but site visits by Renzo Tonin & Associates on Thursday 6th February 2014 and Thursday 4th June 2015 (described in more detail below) confirm that noise from existing site operations does not contribute in any significant way to the measured background noise levels at the monitoring locations. In support of this conclusion are the following observations:

- i. the separation distance between the site and sensitive receivers;
- ii. the acoustic shielding afforded by the intervening industrial buildings;
- iii. the dominance of traffic noise from Sunnyholt Road; and,
- iv. the acoustic shielding provided by the interposed 4.2m high traffic noise barriers on Sunnyholt Road the locations of which are shown in Figure 1.

4.2 Long-term unattended noise measurement results

Long-term unattended noise monitoring was carried out by ERM from Tuesday 17th to Tuesday 24th December 2013. The results of the long term noise monitoring were analysed and noise level-vs-time graphs of the data were developed and are annexed in Appendix B.

Table 4.2 presents the overall single Rating Background Levels (RBL) and representative ambient L_{Aeq} noise levels for each assessment period, determined in accordance with the NPfl.

Table 4.2 – Long-term noise monitoring results, dB(A)

Monitoring Location	L _{A90} Rating Background Noise Level (RBL)			L _{Aeq} Ambient Noise Levels		
	Day ¹	Evening ²	Night ³	Day ¹	Evening ²	Night ³
L1 - 1/50 Charles Street	41	45	40	58	55	48
L2 - 2 Anthony Street	44	44	35	52	50	48

Notes:

- 1. Day: 7am to 6pm Monday to Saturday and 8am to 6pm Sundays & Public Holidays
- 2. Evening: 6pm to 10pm Monday to Sunday & Public Holidays
- 3. Night: 10pm to 7am Monday to Saturday and 10pm to 8am Sundays & Public Holidays
- 4. As required by the NPfI, the external ambient noise levels presented are free-field noise levels. [ie. no facade reflection]

4.3 Short-term attended noise measurement results

Short-term attended noise measurements were undertaken on Thursday 6th February 2014 and Thursday 4th June 2015, in order to supplement the long-term noise monitoring and provide greater detail of the surrounding noise environment.

The equipment used for the short term noise measurements in 2014 and 2015 were two Brüel & Kjær Type 2250 precision sound level analysers and an NTi Audio Type XL2 precision sound level analyser, respectively, which are Class 1 instruments having accuracies suitable for field and laboratory use. The instruments were calibrated prior and subsequent to measurements using a Bruel & Kjaer Type 4231 calibrator. No significant drift in calibration was observed. All instrumentation complies with AS IEC 61672.1 2004 'Electroacoustics - Sound Level Meters' and carries current NATA certification (or if less than 2 years old, manufacturers certification).

A summary of the short-term measurement results are presented in Table 4.3.

Table 4.3 – Short-term attended noise monitoring results for Thursday 6th February 2014

Location	Time	Measured Noise Level, dB(A)		Comments on Measured Noise Levels
		L_{Aeq}	L _{A90}	
Thursday 6 th February 2	014			
S1 – 50 Charles Street		57	43	Dominant noise source at this location was traffic noise from Sunnyholt Road.
S2 – 6 Railway Road	2:34pm - 2:49pm	60	46	Dominant noise source at this location was traffic noise along Railway Road, rail movements along adjacent railway line and some industrial noise audible from the Blacktown industrial area but not measurable.
S1 – 50 Charles Street		57	42	Dominant noise source at this location was traffic noise from Sunnyholt Road.
S3 – 17 Camorta Close	2:59pm - 3:14pm	47	45	Dominant noise source at this location was distant traffic noise and some industrial noise audible from the Blacktown industrial area but not measurable.

Location	Time	Measured Noise Level, dB(A)		Comments on Measured Noise Levels
		L_{Aeq}	L _{A90}	
Thursday 4 th June 2015				
	1:30pm - 1:45pm	62	55	The measurement location was not behind the 4.2m traffic noise barrier and had line of sight to Sunnyholt Road. Dominant noise sources at this location were traffic noise from Sunnyholt Road
R1 – 189 Sunnyholt Road	1:45pm - 2:00pm	64	55	and noise from the BP service station workshop located directly across Sunnyholt Road including intermittent noise from ratchet guns, saws and general impact noise (bangs). Some distant
	2:00pm - 2:15pm	64	58	construction noise was audible from a construction site on Anthony Street, to the north, but not measurable. Noise from the Sell & Parker Kings Park site was inaudible throughout the measurement period.
S3 – 17 Camorta Close	2:31pm - 2:46pm	47	44	Dominant noise source at this location was distant traffic noise and some industrial noise audible from the Blacktown industrial area but not measurable. Noise from the Sell & Parker Kings Park site was inaudible throughout the measurement period.

An attempt to conduct attended measurements at Location S1 on Thursday 4th June 2015 was aborted due to the influence of extraneous noise from concreting works at a nearby construction site on Anthony Street.

4.3.1 Summary of short-term attended noise measurement results

Based on the simultaneous short-term attended noise monitoring results presented in Table 4.3, a correlation factor of 3dB was determined for the L_{A90} between the monitoring locations S1 and S2 and between location S1 and S3. The correlation factor is then applied to the long-term unattended noise monitoring results and the correlated Rating Background Noise Level results for Railway Road and Camorta Close are presented in Table 4.4.

Table 4.4 - Correlated Rating Background Noise Levels, dB(A)

Manitarina Lasatian	L _{A90} Rating Background Noise Level (RBL)					
Monitoring Location	Day ¹	Evening ²	Night³			
S2 – 6 Railway Road	44	48	43			
S3 – 17 Camorta Close	44	48	43			

Notes:

- 1. Day: 7am to 6pm Monday to Saturday and 8am to 6pm Sundays & Public Holidays
- 2. Evening: 6pm to 10pm Monday to Sunday & Public Holidays
- 3. Night: 10pm to 7am Monday to Saturday and 10pm to 8am Sundays & Public Holidays
- 4. As required by the NPfI, the external ambient noise levels presented are free-field noise levels. [ie. no façade reflection]

It is acknowledged that the RBLs determined for Locations S2 and S3 are approximate only; however, as confirmed below, they are separated from the subject site by such large distances that noise impacts are well below the nominated criteria. Accordingly, it is not necessary to determine more precise background noise levels at these locations.

5 Meteorology

The NSW EPA's NPfl recommends that project noise criteria are to apply under weather conditions characteristic of an area. These conditions may include calm, wind and temperature inversions. In this regard, the increase in noise that results from atmospheric temperature inversions and wind effects may need to be assessed. The noise levels predicted under characteristic meteorological conditions for each receiver are then compared with the criteria, to establish whether the meteorological effect will cause a significant impact.

The NSW EPA's NPfl permits two approaches for assessing these effects – use of default parameters and use of site-specific parameters.

- With using default parameters, general meteorological values are used to predict noise levels, foregoing detailed analyses of site-specific meteorological data. This approach assumes that meteorological effects are conservative, in that it is likely to predict the upper range of increases in noise levels. Actual noise levels may be less than predicted.
- The use of site-specific parameters is a more detailed approach, which involves analysing site meteorological data to determine whether inversion and/or wind effects are significant features warranting assessment. Where assessment is warranted, default parameters are available for use in predicting noise or, where preferred, measured values may be used instead. The use of site-specific parameters provides a more accurate prediction of noise increases due to meteorological factors, however, is more costly especially if suitable site data is unavailable and long-term meteorological monitoring is required. Existing weather data may be used, provided the site is within a radius of 30 km of the collection point and in the same topographical basin.

For this assessment, the more detailed approach using site-specific meteorological parameters was conducted. Weather data was obtained from the Bureau of Meteorology's automatic weather station installed at the Horsley Park Equestrian Centre, located 12 km south of the subject site, over the period between 2nd June 2014 and 1st June 2015. As the subject site is situated within an industrial complex with surrounding suburban locality, the likelihood of night time temperature inversion occurrences is insignificant. Consideration of night time temperature inversion is not required and only wind effects are considered from herein.

5.1 Wind effects

The INP specifies a procedure for assessing the significance of wind effects, and a default wind speed to be used in the assessment where these effects are found to be significant. The procedure requires that wind effects be assessed where wind is a feature of the area.

Wind is considered to be a feature where source-to-receiver wind speeds (at 10 m height) of 0.5 to 3 m/s occur for 30% of the time or more in any assessment period (day, evening and night) in any

season. Winds with velocities less than 0.5 m/s (calm conditions) and greater than 3 m/s (at 10 m height), are not included in the calculations of wind occurrence.

Where there is 30% or more occurrence of wind speeds between 0.5 m/s and 3 m/s (source-to-receiver component), then the highest wind speed is used (below 3 m/s) instead of the default. Where there is less than a 30% occurrence of wind between 0.5 m/s and 3 m/s (source-to-receiver component), wind is not included in the noise-prediction calculations.

Analysis of the wind data from the Horsley Park Equestrian Centre automatic weather station was undertaken using the EPA's Noise Enhancement Wind Analysis program to determine if wind is a 'feature' of the area as defined by the INP. The program determines whether there are prevailing source-to-receiver wind conditions. The results of the analysis are presented in Table 5.1 below:

Table 5.1 – Percentage of wind records (up to 3 m/s) from subject site to receiver, %

D .	Summer		Autumn		Winter		Spring	
Receiver	Day	Eve	Day	Eve	Day	Eve	Day	Eve
R1 – Sunnyholt Road	6.9	3.2	15.6	10.1	20.1	22.1	10.7	8.9
R2 – Camorta Close	10.9	21.4	16.9	25.6	14.7	28.9	7.5	21.1
R3 – Railway Road	17.6	30.8	10.3	7.6	5.9	2.6	12.0	22.6
R4 – 38 Tattersalls Road	8.7	17.2	17.5	32.3	17.4	36.1	7.7	18.8
R5 – 57-69 Tattersalls Road	14.6	29.7	12.6	9.0	10.7	7.0	10.1	22
R6 – 21 Tattersalls Road	6.5	5.1	16.9	21.6	23.2	36.2	9.1	12.5
R7 – 38 Forge Street	19.2	7.9	14.7	8.9	16.1	11.9	20.3	9.2

Notes: 1. **Bold** denotes greater than 30% occurrence of wind between 0.5 m/s and 3 m/s (source-to-receiver component)

The results above indicate that there is greater than 30% occurrence of winds between 0.5 m/s and 3 m/s (source-to-receiver component) for Receivers R3, R4 and R6. Therefore, prevailing wind conditions in accordance with the NPfl are considered in the noise prediction calculations for Receivers R3, R4 and R6.

6 Criteria

Noise impact is assessed in accordance with the NSW 'Noise Policy for Industry' (NPfl, 2017). The assessment procedure has two components:

- Controlling intrusive noise impacts in the short-term for residences; and
- Maintaining noise level amenity for residences and other land uses.

In accordance with the NPfI, noise impact should be assessed against the project noise trigger level which is the lower value of the project intrusiveness noise levels and project amenity noise levels.

6.1 Project intrusive noise levels

According to the NPfl, the intrusiveness of a noise source may generally be considered acceptable if the equivalent continuous (energy-average) A-weighted level of noise from the source (represented by the L_{Aeq,15min} descriptor) does not exceed the background noise level measured in the absence of the source by more than 5dB(A). The project intrusiveness noise level, which is only applicable to residential receivers, is determined as follows:

L_{Aeq,15min} Intrusiveness noise level = Rating Background Level ('RBL') plus 5dB(A)

6.2 Amenity noise levels

The project amenity noise levels for different time periods of the day are determined in accordance with Section 2.4 of the NPfl. The NPfl recommends amenity noise levels (L_{Aq,period}) for various receivers including residential, commercial, industrial receivers and sensitive receivers such as schools, hotels, hospitals, churches and parks. These "recommended amenity noise levels" represent the objective for total industrial noise experienced at a receiver location. However, when assessing a single industrial development and its impact on an area, "project amenity noise levels" apply.

The recommended amenity noise levels applicable for the subject area are reproduced in Table 6.1 below.

Table 6.1 - Recommended amenity noise levels, dB(A)

Type of Receiver	Noise Amenity Area	Time of Day	Recommended amenity noise level, L _{Aeq,}
Residential	Suburban	Day	55
		Evening	45
	_	Night	40
Industrial premises	All	When in use	70

Type of Receiver Noise Amenity Area Time of Day Recommended amenity noise level, L_{Aeq},

Notes:

- 1. Daytime 7am to 6pm; Evening 6pm to 10pm; Night-time 10pm to 7am
- 2. On Sundays and Public Holidays, Daytime 8am to 6pm; Evening 6pm to 10pm; Night-time 10pm to 8am.
- The L_{Aeq} index corresponds to the level of noise equivalent to the energy average of noise levels occurring over a measurement period.
- 4. The recommended amenity noise levels refer only to noise from industrial sources. However, they refer to noise from all such sources at the receiver location, and not only noise due to a specific project under consideration. The level

To ensure that the total industrial noise level (existing plus new) remain within the recommended amenity noise levels for an area, the project amenity noise level that applies for each new industrial noise source is determined as follows:

L_{Aeq,period} Project amenity noise level = L_{Aeq,period} Recommended amenity noise level - 5dB(A)

Furthermore, given that the intrusiveness noise level is based on a 15 minute assessment period and the project amenity noise level is based on day, evening and night assessment periods, the NPfl provides the following guidance on adjusting the $L_{Aeq,period}$ level to a representative $L_{Aeq,15minute}$ level in order to standardise the time periods.

$$L_{Aeq,15minute} = L_{Aeq,period} + 3dB(A)$$

The project amenity noise levels (L_{Aeq, 15min}) applied for this project are reproduced in Table 6.2 below, based on a 'suburban' noise amenity area.

Table 6.2 – Project amenity noise levels

Type of Receiver	Noise Amenity Area	Time of Day	Recommended Noise Level, dB(A)		
	71100		L _{Aeq, Period}	L _{Aeq} , 15min	
Residence	Suburban	Day	55 – 5 = 50	50 + 3 = 53	
	_	Evening	45 – 5 = 40	40 + 3 = 43	
	_	Night	40 – 5 = 35	35 + 3 = 38	
Industrial Premises	All	When in use	70 – 5 = 65	65 + 3 = 68	

Notes

- 1. Daytime 7am to 6pm; Evening 6pm to 10pm; Night-time 10pm to 7am
- $2. \quad \text{On Sundays and Public Holidays, Daytime 8am to 6pm; Evening 6pm to 10pm; Night-time 10pm to 8am.}\\$
- 3. The L_{Aeq} index corresponds to the level of noise equivalent to the energy average of noise levels occurring over a measurement period.

6.3 Project noise trigger levels

In accordance with the NPfl, noise impact should be assessed in terms of both intrusiveness and amenity. Based on the background and ambient noise monitoring carried out at the nearest affected residential locations, the applicable noise criteria are as follows.

Table 6.3 - Project noise trigger levels

Receiver Location	Intrusiveness	Intrusiveness Criteria, L _{Aeq,15min} , dB(A)			Amenity Criteria, L _{Aeq,15min} , dB(A)		
Receiver Location	Day	Evening	Night	Day	Evening	Night	
R1 – Sunnyholt Road	46	46	45	53	43	38	
R2 – Camorta Close ¹	49	49	48	53	43	38	
R3 – Railway Road ¹	49	49	48	53	43	38	
R4 – 38 Tattersalls Road ²	-	-	-	68	68	68	
R5 – 57-69 Tattersalls Road ²	-	-	-	68	68	68	
R6 – 21 Tattersalls Road ²	-	-	-	68	68	68	
R7 – 38 Forge Street²	-	-	-	68	68	68	

Notes:

- 1. Bold denotes most stringent criteria for each period
- 2. Intrusiveness criteria determined based on correlation of short term measurements at Receivers R2 and R3 with short term measurements at Receiver R1
- 3. The daytime amenity criteria have been adopted for the shoulder period as the subject site is located within an industrial complex where the majority of neighbouring facilities are operational during the shoulder period, and the noise environment for residential receivers during the shoulder period is similar to the day time period
- 4. Receivers R4, R5, R6 and R7 are industrial receivers and only the amenity criteria are applicable to these receivers when in use

6.4 Sleep disturbance noise levels

The potential for sleep disturbance from maximum noise level events from premises during the night-time period needs to be considered. In accordance with NPfl, a detailed maximum noise level event assessment should be undertaken where the subject development night-time noise levels at a residential location exceed:

- L_{Aeq,15min} 40dB(A) or the prevailing RBL plus 5dB, whichever is the greater, and/or
- L_{AFmax} 52dB(A) or the prevailing RBL plus 15dB, whichever is the greater.

Where there are noise events found to exceed the initial screening level, further analysis is undertaken to identify:

- The likely number of events that might occur during the night assessment period,
- The extent to which the maximum noise level exceeds the rating background noise level.

The sleep disturbance noise levels for the project are presented in Table 6.4.

Table 6.4 – Sleep disturbance assessment levels

Receiver location	Assessment Level L _{Aeq,15min}	Assessment Level L _{AFmax}
R1 – Sunnyholt Road	43 + 5 = 48	43 + 15 = 58
R2 – Camorta Close ¹	45 + 5 = 50	45 + 15 = 60
R3 – Railway Road ¹	45 + 5 = 50	45 + 15 = 60

Notes: 1. Intrusiveness criteria determined based on correlation of short term measurements at receiver Locations R2 and R3 with short term measurements at receiver Location R1

7 Predicted noise levels

7.1 Noise sources

A summary of mobile and fixed equipment included in the noise modelling for the proposed maintenance and cleaning activities, and relevant sound power levels, is provided in Table 7.1. Sound power levels for this assessment were determined based on noise levels measured on site, previous onsite measurements and data from similar projects.

Table 7.1 - Sound power level of proposed plant, dB(A) re 1pW

	Sound Power Le	Sound Power Level (per item)			
Plant	L _{Aeq} , 15min dB(A)	L _{Amax} dB(A)	(included in noise model)		
Forklift	90	95	3		
Handtools	105	110	1		
Pressure hose	97	102	1		
Crane	107	112	3		

Notes:

7.2 Predicted noise levels

Noise emissions were predicted by modelling the noise sources, receiver locations, topographical features of the intervening area, and possible noise control treatments using CadnaA (version 4.4) noise modelling computer program utilising the ISO9613 standard. The program calculates the contribution of each noise source at each specified receptor point and allows for the prediction of the total noise from a site.

- The noise prediction models takes into account:
- Location of noise sources and receiver locations;
- Height of sources and receivers;
- Separation distances between sources and receivers;
- Ground type between sources and receivers (soft); and
- Attenuation from barriers (natural and purpose built).

The noise predictions were based on the noise model used for a previous acoustic assessment for the site and prepared by Renzo Tonin & Associates (ref. TG616-06F01, dated 19 December 2017).

The following assumptions were made for noise prediction purposes:

• For crane operations, only one crane is located on Tattersalls Road at any one time with the remaining two cranes operating anywhere within the boundaries of the subject site; and

^{1.} Only the noisiest and most dominant noise sources have been presented

• All other mobile plant operating concurrently and operating anywhere within the boundaries of the subject site.

Predicted noise levels based on the above assumptions are summarised in Table 7.2 below.

In addition, meteorological effects in the form of a "prevailing wind condition" scenario including the default 3 m/s wind from source to receiver, has been considered for all assessed time periods for Receivers R3, R4 and R6, as determined in Section 5.1.

Table 7.2 - Predicted noise level emission from maintenance and cleaning operations, dB(A)

	Predicted Noise Levels, L _{Aeq,15min}						
ource ————	Day	Evening	Night				
Receiver R1 – Residential Premises to the east – Sunnyholt Road							
Triteria	46	43	38				
cumulative (neutral conditions)	38	38	38				
Receiver R2 – Residential Premises to the north – Camorta Close							
Criteria	49	43	38				
cumulative (neutral conditions)	35	35	35				
Receiver R3 – Residential Premises to the west – Rail	way Road						
Criteria	49	43	38				
cumulative (neutral conditions)	31	31	31				
cumulative (prevailing wind conditions)	36	36	36				
leceiver R4 – Neighbouring Industrial Premises to th	e north – 38 Tattersalls I	Road					
Triteria	68	68	68				
cumulative (neutral conditions)	68	68	68				
cumulative (prevailing wind conditions)	68	68	68				
leceiver R5 – Neighbouring Industrial Premises to th	e west – 57-69 Tattersall	s Road					
Triteria	68	68	68				
cumulative (neutral conditions)	59	59	59				
leceiver R6 – Neighbouring Industrial Premises to th	e east – 21 Tattersalls Ro	ad					
Triteria	68	68	68				
cumulative (neutral conditions)	52	52	52				
cumulative (prevailing wind conditions)	52	52	52				
leceiver R7 – Neighbouring Commercial/Industrial P	remises to the south – 3	8 Forge Street					
Criteria	68	68	68				
Cumulative (neutral conditions)	61	61	61				

On the basis of noise measurements undertaken at Sell & Parker's Kings Park site and other similar metal recycling facilities, and after accounting for acoustic shielding provided by intervening structures between the site and both residential and industrial receptors, the character of noise as perceived at the receiver locations is not tonal, impulsive or low frequency. Therefore, it is not necessary to apply modifying factors to correct for the character of the noise.

7.2.1 Sleep disturbance predicted levels

In addition to the above predicted noise levels, Table 7.3 below presents a summary of the predicted sleep disturbance noise levels at residential receivers during the night time from 10pm to 7am.

Table 7.3 - Predicted sleep disturbance noise levels from maintenance and cleaning operations, dB(A)

	Predicted L/ Level	Aeq,15min Noise	L _{Aeq,15min}	- LCVCI		L _{AFMax} Sleep	
Receiver Location	Neutral Condition	Prevailing wind condition	Disturbance Criteria	Neutral Condition	Prevailing wind condition	Disturbance Criteria	Complies?
R1 – Residential Premises to the east - Sunnyholt Road	39	N/A	48	44	N/A	58	Yes
R2 – Residential Premises to the north - Camorta Close	35	N/A	50	40	N/A	60	Yes
R3 – Residential Premises to the west - Railway Road	31	44	50	36	44	60	Yes

7.3 Statement of noise impact

Noise impacts exist where the predicted or measured noise level is greater than the project-specific trigger levels.

From the results it is shown that noise emission levels to the residential receivers (Receivers R1, R2 and R3) comply with the project specific trigger levels and sleep disturbance criteria without any additional noise mitigation measures.

Furthermore, noise emission levels to the neighbouring industrial receivers (Receivers R4, R5, R6 and R7) also comply with the project-specific noise goals.

8 Conclusion

An assessment of environmental noise impact from the proposed maintenance and cleaning activities, outside of approved operating hours, at the Kings Park Waste Metal Recovery, Processing and Recycling Facility has been undertaken.

Noise impact from the proposed maintenance and cleaning activities upon the potentially most affected noise sensitive residential locations and neighbouring industrial premises, has been quantified and compared to the noise guidelines set by the EPA.

Noise emissions to all the nominated noise sensitive receivers are predicted to comply with the project-specific trigger levels without noise mitigation measures.

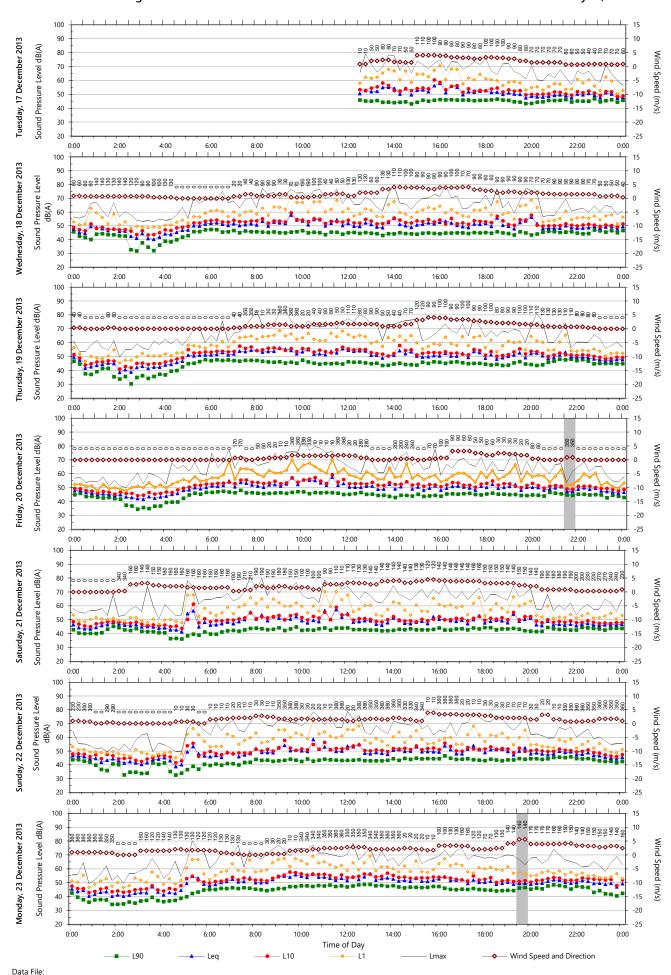
APPENDIX A Glossary of terminology

The following is a brief description of the technical terms used to describe noise to assist in understanding the technical issues presented.

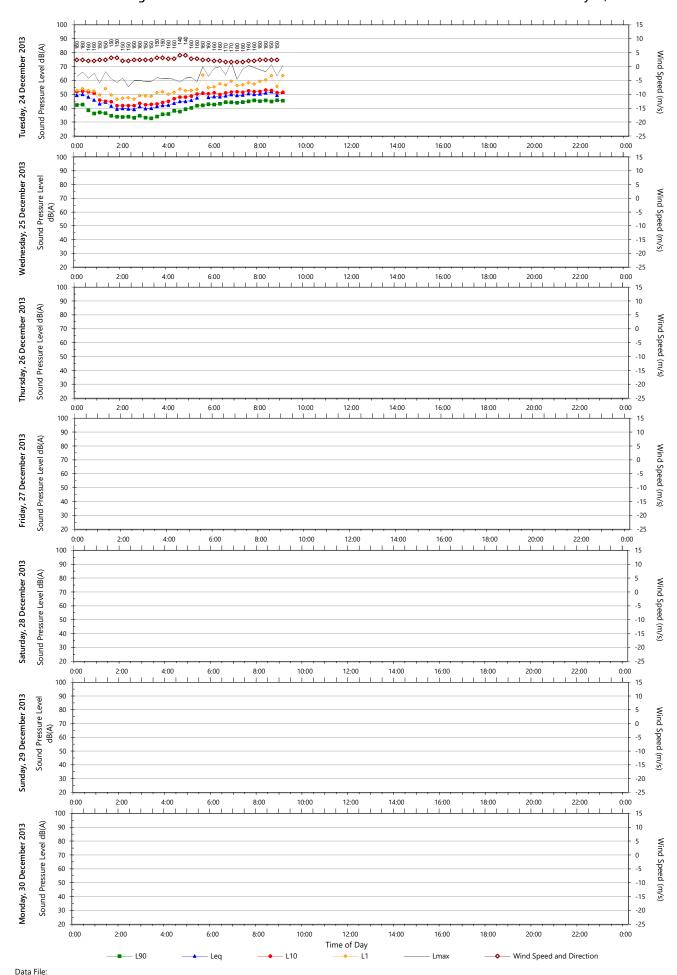
Adverse weather	Weather effects that enhance noise (that is, wind and temperature inversions) that occur at a site for a significant period of time (that is, wind occurring more than 30% of the time in any assessment period in any season and/or temperature inversions occurring more than 30% of the nights in winter).
Ambient noise	The all-encompassing noise associated within a given environment at a given time, usually composed of sound from all sources near and far.
Assessment period	The period in a day over which assessments are made.
Assessment point	A point at which noise measurements are taken or estimated. A point at which noise measurements are taken or estimated.
Background noise	Background noise is the term used to describe the underlying level of noise present in the ambient noise, measured in the absence of the noise under investigation, when extraneous noise is removed. It is described as the average of the minimum noise levels measured on a sound level meter and is measured statistically as the A-weighted noise level exceeded for ninety percent of a sample period. This is represented as the L90 noise level (see below).
Decibel [dB]	The units that sound is measured in. The following are examples of the decibel readings of every day sounds: OdB The faintest sound we can hear 30dB A quiet library or in a quiet location in the country 45dB Typical office space. Ambience in the city at night 60dB CBD mall at lunch time 70dB The sound of a car passing on the street 80dB Loud music played at home
	90dB The sound of a truck passing on the street 100dBThe sound of a rock band 110dBOperational of jackhammer 120dBDeafening
dB(A)	A-weighted decibels. The A- weighting noise filter simulates the response of the human ear at relatively low levels, where the ear is not as effective in hearing low frequency sounds as it is in hearing high frequency sounds. That is, low frequency sounds of the same dB level are not heard as loud as high frequency sounds. The sound level meter replicates the human response of the ear by using an electronic filter which is called the "A" filter. A sound level measured with this filter switched on is denoted as dB(A). Practically all noise is measured using the A filter.
dB(C)	C-weighted decibels. The C-weighting noise filter simulates the response of the human ear at relatively high levels, where the human ear is nearly equally effective at hearing from mid-low frequency (63Hz) to mid-high frequency (4kHz), but is less effective outside these frequencies.
Frequency	Frequency is synonymous to pitch. Sounds have a pitch which is peculiar to the nature of the sound generator. For example, the sound of a tiny bell has a high pitch and the sound of a bass drum has a low pitch. Frequency or pitch can be measured on a scale in units of Hertz or Hz.
Impulsive noise	Having a high peak of short duration or a sequence of such peaks. A sequence of impulses in rapid succession is termed repetitive impulsive noise.
Intermittent noise	The level suddenly drops to that of the background noise several times during the period of observation. The time during which the noise remains at levels different from that of the ambient is one second or more.
L _{Max}	The maximum sound pressure level measured over a given period.
L _{Min}	The minimum sound pressure level measured over a given period.

L ₁	The sound pressure level that is exceeded for 1% of the time for which the given sound is measured.
L ₁₀	The sound pressure level that is exceeded for 10% of the time for which the given sound is measured.
L ₉₀	The level of noise exceeded for 90% of the time. The bottom 10% of the sample is the L90 noise level expressed in units of dB(A).
L _{eq}	The "equivalent noise level" is the summation of noise events and integrated over a selected period of time.
Reflection	Sound wave changed in direction of propagation due to a solid object obscuring its path.
SEL	Sound Exposure Level (SEL) is the constant sound level which, if maintained for a period of 1 second would have the same acoustic energy as the measured noise event. SEL noise measurements are useful as they can be converted to obtain Leq sound levels over any period of time and can be used for predicting noise at various locations.
Sound	A fluctuation of air pressure which is propagated as a wave through air.
Sound absorption	The ability of a material to absorb sound energy through its conversion into thermal energy.
Sound level meter	An instrument consisting of a microphone, amplifier and indicating device, having a declared performance and designed to measure sound pressure levels.
Sound pressure level	The level of noise, usually expressed in decibels, as measured by a standard sound level meter with a microphone.
Sound power level	Ten times the logarithm to the base 10 of the ratio of the sound power of the source to the reference sound power.
Tonal noise	Containing a prominent frequency and characterised by a definite pitch.

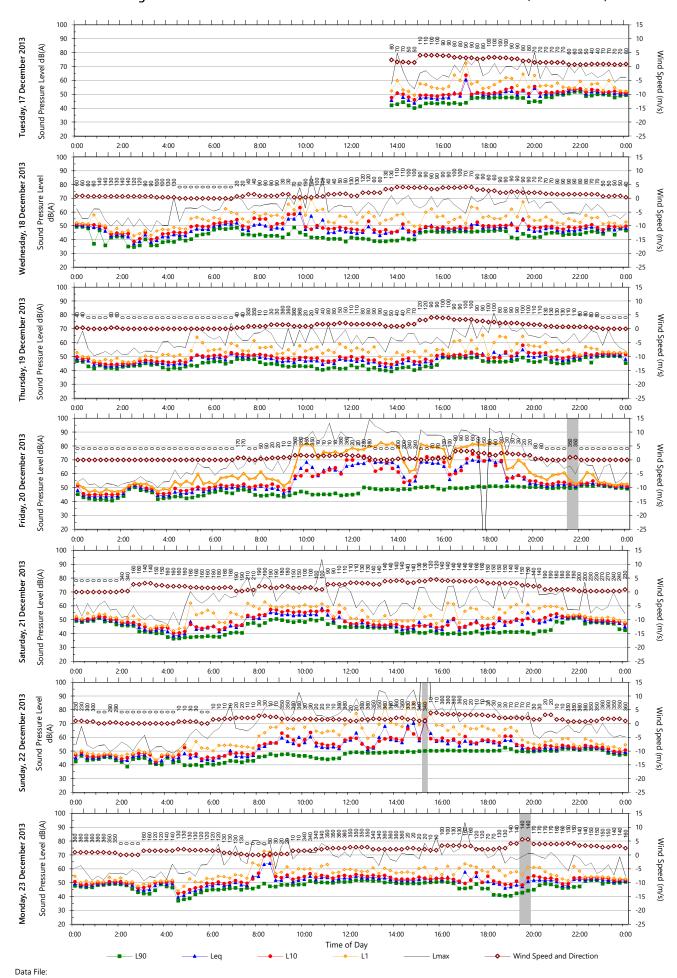
APPENDIX B Long term unattended noise monitoring results

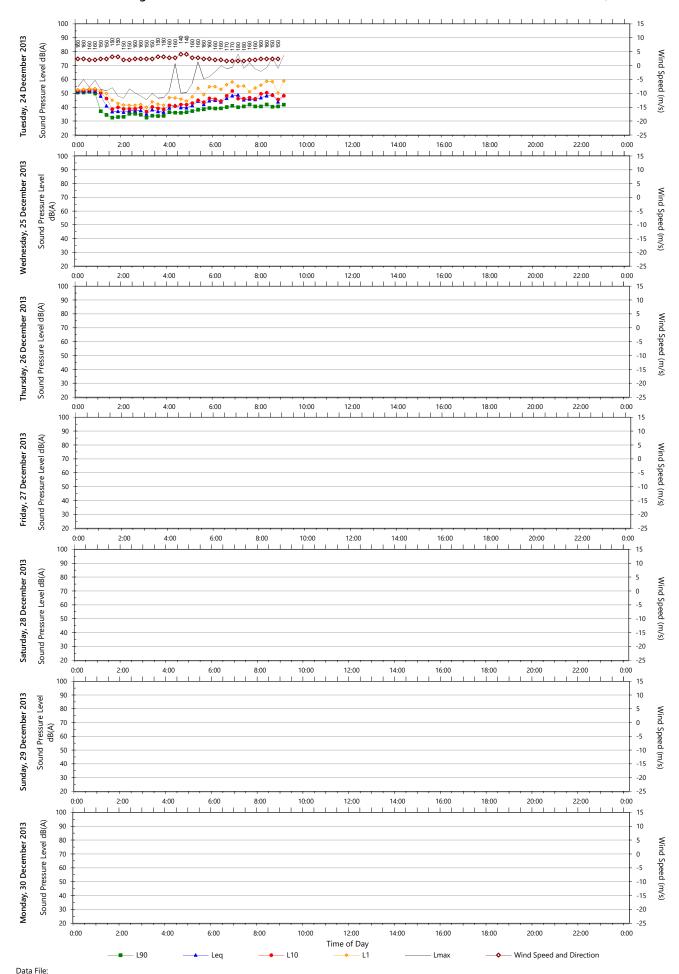


Template QTE-05B (rev 108) Sydney Logger Graphs



Template QTE-05B (rev 108) Sydney Logger Graphs







20 December 2018

TK653-01F03 Mod 3 Acoustic Letter (r1).docx

Sell & Parker Pty Ltd Mr Jordan Rodgers jordanr@sellparker.com.au

From: William Chan [William.Chan@renzotonin.com.au]

Kings Park Waste Metal Recovery, Processing and Recycling Facility - Modification 3 Difference to Acoustic Impacts

1 Introduction

Renzo Tonin & Associates was engaged to review the proposed Modification design changes to the acoustic treatment for Kings Park Waste Metal Recovery, Processing and Recycling Facility located at 45 Tattersall Road, Kings Park. The purpose of this review is to determine the difference in the predicted noise levels presented in the "EIS Supplementary Noise and Vibration Impact Assessment" (prepared by Renzo Tonin & Associates with reference TG616-03F01 dated 3 September 2015), with subsequent changes presented in the "Kings Park Waste Metal Recovery, Processing and Recycling Facility - Section 96 Difference to Acoustic Impacts" (TG616-05F02 dated 10 August 2016), "Kings Park Waste Metal Recovery, Processing and Recycling Facility - Fire Hydrant Water Storage Tanks and Pumps Acoustic Assessment" (TG616-05F03 dated 25 September 2017) and "Kings Park Waste Metal Recovery, Processing and Recycling Facility - Section 96 Difference to Acoustic Impacts" (TG616-06F02 dated 19 December 2017).

2 Section 4.55 Design Changes

The following list of Section 4.55 design changes will potentially affect the acoustic impacts to the identified receiver locations:

- Metal awning and processing equipment increase in height and enclosing of metal awing and installation of metal processing equipment within enclosed space. Noise level of metal processing is reduced compared existing downstream process;
- Fencing and signage extension of existing fencing along the Tattersall Road frontage and at entrances to the site; installation of direction signage at the entrances to the site;
- Building A and Building B offices installation of additional internal elevated office and amenities;





• Offices (western boundary) – installation of elevated office and amenities within the yard area (to the north of Building D);

- Existing shear conversion existing shear to remain in the current location and converted into the machine capable of processing high tensile/pre-stressed metal. Noise level of conversion is expected to be comparable to existing levels;
- Pre-shredder relocation relocation of the pre-shredder from the approved location to further south west to the 'hand unload area' and hand unload operation relocated to Building B;
- Conveyor minor realignment minor realignment of the conveyor to follow the building line (on the roof) of Building C;
- Extension of hours operational hours (no public access or resource recovery processing)
 would be extended to allow cleaning and maintenance activities from 9pm to 6am Monday –
 Saturday and 24 hours on Sunday; and
- Administrative changes.

The proposed extension of currently approved hours of operation to conduct maintenance and cleaning activities is addressed separately in the report with reference TK653-01F02 dated 12 December 2018.

3 Difference to Acoustic Impacts

The Modification 3 design changes listed in Section 2 were updated in the CadnaA noise model used in the previous assessments. The resultant change in acoustic impacts for the identified receiver locations are shown in the table below.

Table 0.1 – Difference to Predicted Noise Level Emission from Site Operations with Modification 3 Design Changes

Receiver	Change in Acoustic Impact
R1 - Residential Premises to the east - Sunnyholt Road	No change
R2 - Residential Premises to the north - Camorta Close	Reduction by 1dB(A)
R3 - Residential Premises to the west - Railway Road	No change
R4 - Neighbouring Industrial Premises to the north - 38 Tattersalls Road	Reduction by 5dB(A)
R5 - Neighbouring Industrial Premises to the west - 57-69 Tattersalls Road	No change
R6 - Neighbouring Industrial Premises to the east - 21 Tattersalls Road	Reduction by 2dB(A)
R7 - Neighbouring Industrial Premises to the south - 38 Forge Street	Reduction by 3dB(A)

It can be seen from the table above that with the Modification 3 design changes, the predicted noise levels to identified receivers will be the same or lower than the noise levels presented in the previous assessment. All receivers were predicted to comply with the nominated criteria in the previous assessments and therefore all receivers are predicted to comply with the Modification 3 design changes.

4 Conclusion

A review of the proposed Modification design changes to the acoustic treatment for Kings Park Waste Metal Recovery, Processing and Recycling Facility showed that predicted noise levels at the identified receiver locations will be the same or lower than presented in the previous reports. All identified receiver locations were found to comply with the nominated noise criteria in the previous reports, and with the Modification 3 design changes all identified receiver locations will comply with the nominated noise criteria.

Document control

Date	Revision history	Non-issued revision	Issued revision	Prepared	Instructed	Authorised
19.12.2018	Generate letter		0	W. Chan		W. Chan
20.12.2018	Update		1	W. Chan		W. Chan

Important Disclaimer:

The work presented in this document was carried out in accordance with the Renzo Tonin & Associates Quality Assurance System, which is based on Australian Standard / NZS ISO 9001.

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This document is prepared for the particular requirements of our Client which are based on a specific brief with limitations as agreed to with the Client. It is not intended for and should not be relied upon by a third party and no responsibility is undertaken to any third party without prior consent provided by Renzo Tonin & Associates. The information herein should not be reproduced, presented or reviewed except in full. Prior to passing on to a third party, the Client is to fully inform the third party of the specific brief and limitations associated with the commission.

In preparing this report, we have relied upon, and presumed accurate, any information (or confirmation of the absence thereof) provided by the Client and/or from other sources. Except as otherwise stated in the report, we have not attempted to verify the accuracy or completeness of any such information. If the information is subsequently determined to be false, inaccurate or incomplete then it is possible that our observations and conclusions as expressed in this report may change.

We have derived data in this report from information sourced from the Client (if any) and/or available in the public domain at the time or times outlined in this report. The passage of time, manifestation of latent conditions or impacts of future events may require further examination and re-evaluation of the data, findings, observations and conclusions expressed in this report.

We have prepared this report in accordance with the usual care and thoroughness of the consulting profession, for the sole purpose described above and by reference to applicable standards, guidelines, procedures and practices at the date of issue of this report. For the reasons outlined above, however, no other warranty or guarantee, whether expressed or implied, is made as to the data, observations and findings expressed in this report, to the extent permitted by law.

The information contained herein is for the purpose of acoustics only. No claims are made and no liability is accepted in respect of design and construction issues falling outside of the specialist field of acoustics engineering including and not limited to structural integrity, fire rating, architectural buildability and fit-for-purpose, waterproofing and the like. Supplementary professional advice should be sought in respect of these issues.

APPENDIX A Glossary of Terminology

The following is a brief description of the technical terms used to describe noise to assist in understanding the technical issues presented.

Adverse weather	Weather effects that enhance noise (that is, wind and temperature inversions) that occur at a site for a significant period of time (that is, wind occurring more than 30% of the time in any assessment period in any season and/or temperature inversions occurring more than 30% of the nights in winter).
Ambient noise	The all-encompassing noise associated within a given environment at a given time, usually composed of sound from all sources near and far.
Assessment period	The period in a day over which assessments are made.
Assessment point	A point at which noise measurements are taken or estimated. A point at which noise measurements are taken or estimated.
Background noise	Background noise is the term used to describe the underlying level of noise present in the ambient noise, measured in the absence of the noise under investigation, when extraneous noise is removed. It is described as the average of the minimum noise levels measured on a sound level meter and is measured statistically as the A-weighted noise level exceeded for ninety percent of a sample period. This is represented as the L90 noise level (see below).
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	0dB The faintest sound we can hear
	30dB A quiet library or in a quiet location in the country
	45dB Typical office space. Ambience in the city at night
	60dB CBD mall at lunch time
	70dB The sound of a car passing on the street
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	100dBThe sound of a rock band
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	120dBDeafening
dB(A)	A-weighted decibels. The A- weighting noise filter simulates the response of the human ear at relatively low levels, where the ear is not as effective in hearing low frequency sounds as it is in hearing high frequency sounds. That is, low frequency sounds of the same dB level are not heard as loud as high frequency sounds. The sound level meter replicates the human response of the ear by using an electronic filter which is called the "A" filter. A sound level measured with this filter switched on is denoted as dB(A). Practically all noise is measured using the A filter.
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Frequency	Frequency is synonymous to pitch. Sounds have a pitch which is peculiar to the nature of the sound generator. For example, the sound of a tiny bell has a high pitch and the sound of a bass drum has a low pitch. Frequency or pitch can be measured on a scale in units of Hertz or Hz.
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L _{Max}	The maximum sound pressure level measured over a given period.
L _{Min}	The minimum sound pressure level measured over a given period.
L ₁	The sound pressure level that is exceeded for 1% of the time for which the given sound is measured.
L ₁₀	The sound pressure level that is exceeded for 10% of the time for which the given sound is measured.

Leq	The "equivalent noise level" is the summation of noise events and integrated over a selected period of time.
Reflection	Sound wave changed in direction of propagation due to a solid object obscuring its path.
SEL	Sound Exposure Level (SEL) is the constant sound level which, if maintained for a period of 1 second would have the same acoustic energy as the measured noise event. SEL noise measurements are useful as they can be converted to obtain Leq sound levels over any period of time and can be used for predicting noise at various locations.
Sound	A fluctuation of air pressure which is propagated as a wave through air.
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Sound pressure level	The level of noise, usually expressed in decibels, as measured by a standard sound level meter with a microphone.
Sound power level	Ten times the logarithm to the base 10 of the ratio of the sound power of the source to the reference sound power.
Tonal noise	Containing a prominent frequency and characterised by a definite pitch.

APPENDIX F

Consolidated List of Mitigation Measures

A consolidated list of mitigation measures including measures from the EIS and the Modification Proposal are included in the table below. Additional measures proposed within the Modification Proposal have been included in *italics and underline*.

Issue	Potential Impact	Mitigation/Management Measure	
Ecology	The overall potential ecological impacts are considered low given the highly disturbed nature of the Site. Only landscaped trees separating the two current separate sites require removal. Potential impacts to threatened species are considered highly unlikely.	The following recommendations aim to minimise ecological impacts of the proposed works:	
		 Sediment control barriers will be installed at the Site during construction and while earthworks are undertaken to reduce the likelihood of silted runoff into adjacent Breakfast Creek in the event of high rainfall 	
		 All vehicles are to keep to the existing and proposed access roads on- site at all times; and 	
		 All work should be undertaken to prevent the spread of pests and noxious weeds in accordance with the Noxious Weeds Act 1993 and the Noxious and environmental weed control handbook – A guide to weed control in non-crop, aquatic and bushland situations (NSW Government, 2011). 	
Heritage (Indigenous)	Potential impacts to previously unknown indigenous artefacts or relics during ground disturbance activities.	In accordance with the <i>Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales</i> (DECCW NSW, 2010) a conservative approach will be adopted at the Site. The following mitigation measures will be implemented:	

Issue	Potential Impact	Mitigation/Management Measure
		 All staff, contractors and others involved in the construction works would be made aware of the statutory legislation protecting sites and places of heritage significance; and
		 All works would cease in the immediate area should any indigenous artefacts or relics be uncovered and the Cultural Heritage Division of the NSW National Parks and Wildlife Service (OEH) contacted.
Heritage (Historical)	Potential impacts to previously unknown items of historical significance during ground disturbance activities.	The following mitigation measures are recommended to ensure that if any historical heritage artefacts are encountered appropriate measures are implemented:
		 All staff, contractors and others involved in the works would be made aware of the statutory legislation protecting sites and places of heritage significance prior to works commencing; and
		 In the event that a site or artefact (as defined by the National Parks and Wildlife Act 1974 or Heritage Act 1977) is identified during construction works, works shall cease at the location. The find shall be immediately reported to the regulator in accordance with legislation. No work shall commence in the vicinity of the find until any required approvals have been given by the regulator.
Acoustics	Noise and vibration impacts to nearby commercial premises during construction and operation.	The following acoustic screen fencing is proposed to mitigate noise emissions from Site operations to neighbouring existing and proposed new industrial premises:
		 Retain the existing acoustic screen fencing at a height of 4m, which is currently erected around the existing Site northern and western boundary and along existing driveways as shown in the Site drawings; and
		 Proposed new metal/colorbond and electric fence along the new eastern boundary shall be an acoustic screen fencing of 4m height

Issue	Potential Impact	Mitigation/Management Measure
		In addition to the above, the noise screen will be designed with regard to the following
		 The extent of noise reduction required of the noise screen as a whole as perceived from any potentially affected receiver sites;
		 Any penetrations through the fabric of the noise screen will be sealed air tight;
		All joints between noise screen panels will be sealed air tight; and
		Noise screens will have no clearance gaps underneath them.
Air Quality	Potential localised air quality impacts associated with increased concentrations of TSP at nearby commercial and residential locations.	The following mitigation measures will be implemented to manage potential localised air quality impacts during construction and operation:
		 Vehicles and equipment shall be maintained in accordance with the manufacturer's specification
		 Additional Site fencing located on the eastern boundary of the Site, should include appropriate dust screen to minimise airborne dust movements; and
		 All surplus soils from excavations during construction, not reused on- site, shall be removed from Site by covered trucks and disposed of at an appropriately licensed facility.
	Release of GHG emissions into the atmosphere.	Efficiency measures which will be implemented to manage Greenhouse Gas (GHG) emissions during construction and operation include:
Greenhouse Gas	Based on the GHG assessment undertaken indicate that GHG emissions associated with the upgrade would represent an increase od 0.006% on Australia's national GHG emissions in 2010/11 of 563.1 Mt CO2-e, which is considered negligible.	The Site will be sealed, which will reduce the emission of GHGs from the mobile materials handling equipment due to a more consistent driving surface and the ability to select more direct routes across the Site;

Issue	Potential Impact	Mitigation/Management Measure
		 The new Site design no longer requires trucks to enter the Site twice but allows for one main entrance and exit point, reducing the kilometres driven by trucks;
		 The increased throughput allows for efficiencies due to the economy of scale;
		 Additional equipment purchased for the upgrade will conform to the standards of the latest technology including the installation of conveyors to move material after processing rather than by FEL or truck;
		 Post-upgrade the Site has additional capacity to recover ferrous and non-ferrous materials from the recycling process, decreasing the need for end users to source raw materials from the extraction industries; and
		 Where possible, the Site will strive to continually improve the energy efficiency of its process and operations by implementing electricity and cost saving measures.
		To manage and control stormwater, the following mitigation measures are proposed:
Soil and Water	Accidental release/spillage of contaminants and wastewater generated on-site; Earthworks resulting in potential erosional impacts; and	 Installation of two oil/water separators for the new drainage system within the existing and expanded Site area;
		 Regular cleaning of the oil/water separators should be carried out to maintain performance
	Impacts to water balance as a result of the expansion.	 The existing network of underground stormwater pipes, inlets and oil/water separators will be cleaned and, if damaged, replaced during the Site refurbishment activities;

Issue	Potential Impact	Mitigation/Management Measure
		 A bioretention filter will be installed to received runoff from overland flows and the underground pope network on the expanded Site area; and
		 The existing stormwater pond on the existing Site will be dredged and excavated to remove any contaminated sediments and lined with clay. Verification sampling will be required as will waste classification sampling to allow for the appropriate disposal of any dredged material.
		The general principles to be applied to erosion control for the disturbed Site include:
		 Plan for erosion and sediment control and assess Site constraints during the design phase and before any earthworks begin;
		 Minimise the area of soil disturbed and exposed to erosion;
		 Control water flows from the top of and through the project area – divert up-slope 'clean' water away from disturbed areas and ensure concentrated flows are below erosive levels;
		 Rehabilitate disturbed lands quickly; and
		 Maintain erosion and control measures for the duration of the project until the Site is successfully rehabilitated.
		Key sediment controls include:
		 Protecting stormwater inlets;
		 Constructing a wheel wash;
		 Creating stabilised Site access points;
		Managing stockpiles; and
		Utilising sediment traps such as sediment fencing during construction.

Issue	Potential Impact	Mitigation/Management Measure
		Pollution control methods will include
		 Storage of chemicals within impervious bund of more than 110% of the largest container within the bund;
		 Material Safety Data Sheet (MSDS) for all chemicals stored on-site and made available to Site personnel;
		 Refuelling to occur away from drainage points, with drip trays used and spill kits available; and
		 Trade waste receptacles will be provided for the storage and disposal of all wastes generated on-site.
		To minimise the use of potable water associated with the expansion of the Site, the following measures should be implemented:
		 On-going use of collected runoff in the stormwater basin for operation requirements is recommended, as long as the water is of a quality such that impacts to Site infrastructure, the surrounding environment and the health and safety of employees is avoided;
		 Rainwater tanks may also be installed to utilise the runoff from roof spaces and would likely be best suited to providing water for personal use such as toilet flushing, reducing the requirement from mains supplied potable water; and
		 Landscaped areas along the south boundary will include a range of locally endemic species to enhance the portion of the riparian corridor inside the operational boundary of the redeveloped Site.
Contaminated Land	Potential risks to human health and the environment resulting from	The following management measures will be employed to manage potential exposure to contaminants during construction and operation:
	exposure to historical contamination during ground intrusive works.	 A contingency for the appropriate management of potential unexpected contamination finds should be incorporated in the

Issue	Potential Impact	Mitigation/Management Measure
		Construction Environmental Management Plan (CEMP) for the planned redevelopment of both properties;
		 If localised contaminated soils are encountered during construction works, they shall be segregated and assessed for waste classification and appropriately disposed of or re-used on-site, subject to the results of testing;
		 If significant contamination is encountered during construction works, further investigation in the form of a Phase 1/2 Environmental Site Assessment (ESA) may be required;
		 Any imported fill must be certified at source location (e.g. quarry or property owner) as Excavated Natural Material (ENM) or Virgin Excavated Natural Material (VENM) in accordance with the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment (Waste) Regulation 2005 (POEO Waste Regulation);
		 All pollution incidents that threaten or harm the environment shall be reported immediately to relevant authorities in accordance with the Protection of the Environment Operations Act 1997 (POEO Act); and
		 A Hazardous Materials Register and respective Safety Data Sheets (SDSs) shall be kept on-site at all times and be regularly maintained.
Hazards and	Potential off-site impacts include fatality, human injury or damage to property caused from activities undertaken at the Site.	 At least one hose reel and one fire extinguisher be provided for the oxygen and LPG cylinder storage (AS4332-2004, Table 7.2). This is based upon the 3,000 L of oxygen in the store;
Risks		 Provide one powder type extinguisher and one foam type extinguisher for all bulk class 3 dangerous goods on-site. This includes the storage of fuel and oil removed from vehicles prior to shredding. This

Issue	Potential Impact	Mitigation/Management Measure
		recommendation assumes the recovered liquids are stored in intermediate bulk containers;
		 Maintain the height of the floc pile to less than 4m, or the total volume to less than 1000m³. This ensures the warehouse in which the floc is stored will not be a high hazard occupancy; and
		 Continue with the practice of providing water cannons to provide reach to feed and processed stockpiles in the event of a fire in any stockpile.
Fire and Incident	Floc material has been identified as a potential source of fire. Any uncontrolled leaks or spills have the potential to contaminate soils within unsealed sections of the Site, or be entrained in stormwater flow to the detention basin at the rear of the Site. Overflow of potentially contaminated water from the detention basin, has the potential to detrimentally impact on Breakfast Creek.	The recommendations made in regard to fire protection requirements as detailed above will be implemented. To ensure incidents such as accidental spills and/or leakages from machinery are contained and managed appropriately, the following measures will be implemented:
		 The Site will be appropriately kerbed to retain spillages or stormwater run-off, which outflow via a detention basin. The detention basin has a capacity of 1440m³. This basin will be required to be managed in accordance with the measures identified in Section 6.6 of The Original Approval;
		 Spill kits will be available on-site and be deployed to manage and contain minor spills;
		 All pollution incidents that threaten or harm the environment shall be reported immediately to relevant authorities in accordance with the POEO Act; and
		 It is recommended that a Fire and Incident Response Management Plan, including but not limited to the mitigation measures above, be developed for the Site. Sell and Parker have an existing Emergency Response Plan, this may be updated to include the aforementioned information.

Issue	Potential Impact	Mitigation/Management Measure
		 <u>Further design of fire management measures would be undertaken as part of the detailed design.</u>
Traffic and Transport	Compared against the existing traffic volumes in the vicinity of the Site, the additional traffic generated by the proposed development is considered negligible and is not be expected to compromise the safety or function of the surrounding road network.	A site-specific Construction Traffic Management Plan (CTMP) will be prepared prior to works commencing on-site. This is to outline construction traffic volumes, truck routes, access arrangement and construction worker parking arrangements.
Social and Economic Resources	The proposed development presents an overall positive impact to the local community in terms of employment opportunities and indirect contributions to the local community.	The following measures should be implemented to ensure that the positive socio-economic impacts of the proposed development are maximised:
		 Seek to utilise locally available labour force when recruiting for additional employees, including where possible those that have been affected by hob losses at the Dexion site;
		 Where possible, investigate opportunities for offering apprenticeships for new work force and offer additional training for existing workforce;
		 Communicate to local business and community the expected start date of construction; and
		 Any complaints received relating to site operations are to be recorded and attended to promptly.
Visual Amenity	The proposed development will not result in significant visual impacts in the vicinity of the Site or neighbouring areas.	Whilst visual amenity impacts associated with the proposed development are considered negligible, the following management measures will be implemented:
		 Native trees, shrubs and grass species will be planted along site boundaries, particularly the frontage with Tattersall Road, which will complement and enhance existing landscaped vegetation in accordance with the Landscape Concept Plan provided in Annex M of The Original Approval.

Issue	Potential Impact	Mitigation/Management Measure
	Potential impacts include: Excessive waste being directed to landfill; Various types of waste being generated and stored onsite, with the potential for misclassification; Contaminated waste not being correctly stored or disposed; and Off-site impacts to soil and/or water and/or groundwater.	All waste transported to and removed from the Site should be done so in accordance with road and transportation legislation. In all cases, appropriately licensed transport contractors are to be engaged to transport waste material to and from the site. The contractors appointed to transport waste are to ensure they:
		 Are licensed to transport the type of waste they receive;
		 Transport the waste to a licenced facility capable of receiving the type of waste and quantity they are carrying;
		 Waste is adequately covered during transport; and
		 The contractor transporting the waste is to ensure that completed waste data forms are provided to the waste facility upon arrival.
Waste Management		The designated site manager or appointed responsible delegate should prepare monthly reports clearly documenting the waste that has been received and generated. These should be prepared using waste receipts that have been retained and should include:
		 A review of licenses held by the facilities where waste has been disposed to access/ensure their ability to accept the waste in accordance with relevant legislation; and
		 Include any incident reports relating to waste (i.e. spills) which have occurred over that month. Any corrective actions undertaken should also be included.
		All waste materials which meet the specification to be reused/recycled will be processed on-site or be taken to an approved facility, capable of accepting

Issue	Potential Impact	Mitigation/Management Measure
		those materials. All other waste is to be disposed of in accordance with the classification of the waste at an approved licensed facility.

