



30 July 2015

Wollongong Recycling

Our ref: 21/24245

209931

Your ref:

Dear Sir/Madam

**Kembla Grange Waste Recovery Facility
Response to second set of EPA comments on the Air Quality Assessment**

Wollongong Recycling and Building Supplies Facility (Wollongong Recycling) propose to construct and operate a waste recovery facility (WRF) at Wyllie Road, Kembla Grange ('the proposal').

GHD Pty Ltd (GHD) was engaged by Wollongong Recycling to undertake an assessment of potential air quality impacts associated with the proposal. A level 2 assessment of air quality impacts has been prepared following guidance in the Approved Methods for Modelling and Assessment of Air Pollutants in New South Wales (DECC, 2005).

The NSW Environmental Protection Authority (EPA) provided detailed comments and recommendations (15 December 2014) on the GHD air quality assessment (Resource Recovery Facility, Kembla Grange (SSD 5300) Exhibition of Environmental Impact Statement – Submission from NSW EPA, NSW EPA 2014). The air quality assessment was updated by GHD to address these comments.

The EPA then issued further comments on 17 June 2015 regarding the air quality assessment, including additional requirements that were not previously included in the first set of comments.

The following changes have been made in the latest revision of the air quality assessment to address these additional comments;

- The receptor location R6 has been moved to the northern boundary of the Patrick site for both the odour and dust assessments. The location has been chosen to take into account maximum dust and odour impacts from the proposal. This can be seen on all figures in the air quality assessment.
- Individual dispersion model predictions (24 hour average) have been added to the corresponding measured background concentration as measured at the OEH site at Kembla Grange. This is consistent with the guidance provided in Section 11.2.b Level 2 assessment – Contemporaneous impact and background of the Approved Methods. Results are summarised in Section 6.2 and detailed results are shown in Appendix C.
- The meteorological conditions leading to worst case dust impacts are discussed in Section 6.4
- The emission inventory in Table 6 shows the source apportionment of significant dust emissions from the proposal. As all equipment has been conservatively assumed to operate nonstop all day, this table can be used to determine which source would contribute to offsite dust impacts at any one time.

- Dust from crushing activities alone has been assessed at the Patrick Autocare site and is summarised in Section 6.3. Monthly dust deposition from crushing is predicted to be 0.034 g/m² at the property boundary and even less at other areas of the Patrick site. This represents less than 2% of the allowable increment amenity dust criteria in the Approved Methods and is not predicted to cause any noticeable impact on cars at the Patrick site.
- Detailed predicted dust emissions have been presented for all receivers in Appendix C. These have been sorted and ranked in three columns - background dust, dust increment from site and the total dust.
- Daily measured dust levels at the Kembla Grange OEH monitoring site for the year 2009 are presented in Appendix A. Days where the levels exceeded the 50 µg/m³ criteria have been highlighted in yellow.
- GHD reviewed the Waste Management Plan for the proposal (Benviron Group, April 2015). There is no mention of contaminated products or waste that may result in contaminated dust from the site.

GHD have revised the air quality assessment based on the comments made by the EPA. GHD believe that the amendments address the recommendations made by the EPA. The amendments to the level 2 air quality assessment do not change the outcomes of the assessment and the project would be acceptable from an air quality perspective.

Sincerely
GHD Pty Ltd



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