

Submission Summary - Government Agencies

Kembla Grange Resource Recovery Facility (SSD-5300)
50 Wyllie Road, Kembla Grange

Summary

Government Agencies:

1. Although a large part of the subject site is mapped as bushfire prone, the **NSW Rural Fire Service** is generally satisfied that the hazard lies outside the proposed area of operations. However to minimise risk the RFS suggests that separation distances be maximised between bushfire prone vegetation and the proposed development (particularly stockpiles of flammable materials).
2. The **Office of Environment and Heritage (OEH)** are generally satisfied that the proposal is unlikely to result in a significant impact upon any threatened species, endangered population or endangered ecological community as the majority of works are contained within a cleared portion of the site.
3. **Sydney Trains** does not object to the proposed development, and confirm that a Stage 2 assessment is not required..
4. The **Department of Primary Industries: NSW Office of Water** do not object to the development and are generally satisfied with the management of riparian land and groundwater at the subject site, although they request clarification of several matters.
5. **Wollongong City Council** has confirmed the permissibility of the proposed development and do not object to the proposal.
6. The **Environment Protection Authority** does not object to the proposal proceeding, providing it is carried out in accordance with the recommended conditions of consent.
7. The **Department of Planning and Environment** raise several minor issues, in addition to those identified in the submissions, relating to traffic and transport, previous development consent, and water - stockpiling.

Public Submissions:

1. **Kaliwest Pty Ltd** does not object to the proposed works. Kaliwest Pty Ltd submits that appropriate conditions should be imposed to ensure that emissions are monitored and do not interfere with the use and enjoyment of surrounding properties.
2. **Patrick Autocare** object to the proposed expansion of works at the subject site and are especially concerned about dust, odour and aerosol emissions impacting on air quality at its facility.
3. **Private and Confidential Submissions:** The Objector is dissatisfied with and opposes numerous aspects of the proposed works.
4. Submission - lodged in support of the project.

Submission Number	Author Name/Organisation	Summary of Issue
1	NSW Rural Fire Service	<p>Vegetation Hazard NSW RFS has identified some issues with bushfire prone vegetation in relatively close proximity to the development. These issues relate to the potential for a bushfire in the bush both within and beyond the site to ignite open stockpiles of potentially flammable green waste and timber materials. The reverse also applies, i.e. a fire within the site has the potential to spread to adjoining bushland.</p>
2	Office of Environment and Heritage	<p>Biodiversity The OEH notes that the riparian zone on the site is currently subject to works being undertaken in accordance with a Vegetation Management Plan (VPM), and that the VPM currently has a two year maintenance period attached. The OEH is concerned that without ongoing management beyond the maintenance period the riparian zone is likely to suffer future degradation.</p> <p>Flooding The OEH identified two issues related to downstream impacts and stormwater infrastructure in their review of the Flood Analysis Review (KFW, 2013) and Addendum 2D Flood Report (KFW, 2014). Specifically, these issues relate to:</p> <ul style="list-style-type: none"> • Management of potential downstream adverse flood impacts and flood isolation hazards. • Contingencies related to the performance of stormwater infrastructure should design rainfall be exceeded.
3	Sydney Trains	<p>Traffic and Transport Infrastructure Sydney Trains is concerned about the proposed increase in traffic over the current level crossing at West Dapto Road, Kembla Grange. Sydney Trains note that the traffic modelling report and traffic management plan relating to current traffic volumes and the proposed increase, provided in the submission, rely on outdated data. A further submission confirms that the additional analysis to address the rail level crossing is satisfactory and that a Stage 2 assessment is not required.</p>
4	Department of Primary Industries: NSW Office of Water	<p>Riparian Land The Office of Water has seek greater detail relating to the Vegetation Management Plan. Specifically, further information is needed to justify the Proponent's assertion that the implementation of a fully structured riparian corridor is not considered "compatible" to the surrounding land use.</p> <p>Groundwater The Office of Water are generally satisfied that the proposal adequately addressed issues related to groundwater and the ongoing management and monitoring of groundwater during construction. However, they reemphasise that if groundwater flows are "discovered" during construction further assessment should be undertaken and the Office of Water will be notified to allow for authorisation. They further highlight that if groundwater is likely to be intercepted or extracted, depending on the volumes encountered and the duration of pumping, an authorisation may be required from the Office of Water in relation to construction excavation and dewatering activities.</p>
5	Wollongong City Council	<p>Development history and relationship to current proposal Wollongong City Council has confirmed the permissibility of the proposed development and do not object to the proposal. However, they identify a possible issue related to an existing workshop structure on site in which an interim Occupation Certificate has previously been granted.</p> <p>Environment Wollongong City Council has highlighted the need for further consideration of on-site sewerage management.</p>

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6	Environment Protection Authority	Air Quality and Odour - Dust The EPA provides an overview of the EIS regarding proposed mitigation measures to control dust which the proponent has included in their statement of commitments. The EPA notes that the following conditions were not specified in the air quality management plan for the facility: <ul style="list-style-type: none"> • The AQIA also recommends that truck movements be minimised during windy conditions. • Reduction of emissions from crushing and processing activities through the use of wet suppression systems was not assessed and are potential additional options for additional dust mitigation.
		Air Quality and Odour - Odour The EPA is concerned by the risk of adverse odour impacts at nearby sensitive receptors should mitigation systems outlined in the EIS not perform at the level of control assumed. The EPA are particularly concerned by the potential for composting facilities to result in adverse odour impacts and note that it is imperative that the facility is designed and constructed so as not to preclude the retrofit of additional control measures. The EPA also note that further consideration of additional odour mitigation measures relating to the leachate pond and management of organic waste and mature compost stockpiles is recommended.
		Noise The EPA commented that the rating background level calculations: <ul style="list-style-type: none"> • Were based on weather data sourced from the Albion Park weather station. The use of a nearer weather station (such as the Office of Environment and Heritage (OEH) air quality monitoring station at Kembla Grange) was recommended. • Included some periods of noise data corresponding to adverse weather conditions that should have been excluded. • Should be undertaken strictly in accordance with the Industrial Noise Policy (EPA 2000). The EPA made the following comments on the operational noise assessment: <ul style="list-style-type: none"> • Consistency in the use of the correct assessment time period based on the facility operational hours. • Provision of details regarding modifying factor adjustments. • The use of a reduced ground absorption coefficient value of 0.5, from 0.75. • Using stability categories with a 3 m/s wind from the North-western quadrant. <p>With respect to mitigation the submission from the EPA states "No operational noise mitigation measures were proposed, as the modelled impact of the WRF as presented in the NA complied with PSNLs. The EPA estimates indicates that the proposal will contribute up to 2 dBA above the adopted PSNL at Kingston Town, but the PSNL was based on background noise measurements between the WRF and monastery. The PSNL for Kingston Town, if it were actually measured at Kingston Town, is likely to be higher due to proximity to the Princes Motorway (M1)".</p> <p>Whilst some issues discussed above remain outstanding and may need to be addressed for any further development of the site in the future, the issues do not significantly affect the outcomes of this assessment.</p>
		Waste - General Comments The EPA is concerned by conflicting information in the EIS with regards to how some wastes are proposed to be handled at the site (for example, stockpile storage limits and process locations for organic wastes). Concern is also raised with regards to modelling undertaken for the AQIA and NIA which is based on assumptions of certain

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		types and quantities of waste being received, processed and stored at the site.
		Waste - Outputs The EPA understands that the Proponent intends on recovering much of the waste received at the facility and using it to make products that will be sold to consumers in various uses. The EPA notes that the Proponent must comply with The Protection of the Environment Operations (Waste) Regulation 2014, which replaces The Protection of the Environment Operations (Waste) Regulation 2005.
		Waste - Garden Waste The EPA is generally satisfied that the proposal complies with the Protection of the Environment Operations (Waste) Regulation 2014, however they highlight that any garden waste received by the facility will need to be composted in accordance with the "Compost Order 2014", and the production of raw mulch at the facility will need to be in accordance with the "Raw Mulch Order" 2014. The EPA also draw attention to ongoing compliance with the AQIA in terms of the volume of organic waste received and composted at the facility each year.
7	Department of Planning and Environment	Traffic and Transport The DPE seek further information related to issues concerning traffic impact of the proposed development: <ul style="list-style-type: none"> • Review of the Level of Service on the surrounding road network as a result of the proposal. • Justification for the assumption of an increase from 500 vehicles per day to 1,000 vehicles per day. • Justification for the selection of traffic generation rates based on the existing development. • Details and citation of the source of the recommended on-site parking provision. • Clarification of statements referring to a four month construction period and five year staging of the development. • Legible figures and appendices.
		Previous Development Consent The DPE seeks further details of any Construction Certificates and final Occupation Certificates issued for existing development on the site which have not already been provided by Wollongong City Council.
		Water The DPE have raised the following issues related to stockpiling: <ul style="list-style-type: none"> • Provide details of temporary vegetation to stockpile areas where stockpile is to be left for more than two months, as indicated on the Soil and Water Management Plan. • The legend to Dwg C28 Cut and Fill Plan does not distinguish between areas of cut and areas of fill.