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Environmental Assessment

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31 May 2012

The Director-General
NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Director-General,

Resource Recovery Facility
Lot 52, DP 618900, No.7 Montore Road, Minto

Our client, Camolaw Pty Ltd, has recently purchased the subject site for the establishment of a Resource Recovery Facility on the subject site.

To assist the Department, we provide, as **Figure 1** below, a map of the site location.

Figure 1: Site Location Map

Figure 2 below is an extract from an aerial photograph which shows the site.

Figure 2: Extract from an aerial photograph of the site

Figure 3 shows an extract from an older aerial photograph depicting the property boundary.

Figure 3: Aerial photograph showing the property boundary

The proposed development is classified as *resource recovery facility* which is defined in the Standard Local Environmental Plan as:

> ***resource recovery facility*** *means a building or place used for the recovery of resources from waste, including works or activities such as separating and sorting, processing or treating the waste, temporary storage, transfer or sale of recovered resources, energy generation from gases and water treatment, but not including re-manufacture or disposal of the material by landfill or incineration.*

The objectives of the proposal are:

(a) To establish a commercially viable Resource Recovery Facility which is capable of recovering recyclable concrete, brick, asphalt, sandstone and sand from the waste stream for reuse.

(b) To assist the NSW State government in achieving its objectives for the recovery and recycling of waste as detailed in the *NSW Waste Avoidance and Resource Recovery Strategy 2007*.

(c) To establish an environmentally responsible and sustainable industry which would create employment.

The site is located within the City of Campbelltown Council area and is zoned 4(a) General Industry pursuant to the Campbelltown (Urban Area) Local Environmental Plan 2002. A Resource Recovery Facility is permissible, with consent, in the 4(a) General Industry zone.

It is intended that the proposed facility caters for 250,000 tonnes per annum of material.

The proposed facility would receive concrete, brick, asphalt, sandstone and sand from the building and construction industry in the Sydney metropolitan area. No domestic loads would be received at the facility.

Waste material would be delivered to the site by truck, usually with a capacity of 7 tonne to 30 tonne. Trucks would stop at a receival point where the load would be inspected to ensure loads comply with the materials which the facility is licenced to receive pursuant to the Environment Protection Licence. If accepted, the driver would be instructed to proceed to the weighbridge office where a docket would be issued. If rejected, the driver would be instructed to turn around and leave the site.

Once a docket is issued, the truck driver would be directed to a designated stockpile depending on the type of waste the truck is carrying. The load would be tipped and the truck would leave the site via the wheel wash.

A wheel loader would push the deposited waste up into the main stockpile awaiting processing. If waste received is too large for the primary crusher, it would be broken down in size using a mechanical pulveriser fitted to an excavator prior to loading into the primary crusher.

Sprinkler systems would be utilised to dampen the waste material in order to control dust.

The primary crusher would be contained within a purpose built building. Inside the building where the primary crusher is housed, a fogging system would be employed to control dust.

The initial processing stage would see waste crushed to about 100mm minus from where it would be conveyed to a magnet where scrap metal would be removed.

Once the material has passed over the magnet, it would pass through a picking station where employees would remove any foreign material such as wood, plastic, paper and the like.

The material would then be transported by conveyor to the secondary crusher where it would be reduced to about 30mm minus in size. The secondary crusher would also be located within a purpose built building.

The material would then be passed under a second magnet prior to being transferred by conveyor to the first screen where 20mm minus material would be conveyed to the second screen where it would be split into sand and aggregates.

Any 25mm plus material would be returned to the secondary crusher for further processing.

Processed materials would be transferred by conveyor stackers to product stockpiles of maximum height 10m. Product would then be transferred by wheel loader to designated stockpile locations.

Product would be loaded onto delivery trucks by a wheeled loader. The delivery trucks would travel through the wheel wash and onto the weighbridge where the driver would receive a docket and leave the site.

The use of the site as a Resource Recovery Facility would require the use of a number of related components. The key elements of the proposal are as follows:

- wheel loaders.
- excavators.
- water carts.
- 1 x 10,000 litre capacity fuel truck.
- Weighbridge office where dockets would be issued.
- Weighbridge.
- Wheel wash.
- Workshop for general repairs.
- Store where spare parts would be housed.
- Staff lunch room and associated amenities.

- A 10m high shed containing the primary crusher.
- Picking station where labourers would hand pick waste from the product stream.
- An 8m high shed containing the secondary crusher and screens.
- An 8m high shed containing the second screen.
- Car park.
- 4 x 250,000 litre stormwater storage tanks.

Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 contains the following definition:

> ***Waste and resource management facilities***
>
> *(1) Development for the purpose of regional putrescible landfills or an extension to a regional putrescible landfill that:*
>
> *(a) has a capacity to receive more than 75,000 tonnes per year of putrescible waste, or*
>
> *(b) has a capacity to receive more than 650,000 tonnes of putrescible waste over the life of the site, or*
>
> *(c) is located in an environmentally sensitive area of State significance.*
>
> *(2) Development for the purpose of waste transfer stations in metropolitan areas of the Sydney region that handle more than 100,000 tonnes per year of waste.*
>
> *(3) Development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste.*
>
> *(4) Development for the purpose of waste incineration that handles more than 1,000 tonnes per year of waste.*
>
> *(5) Development for the purpose of hazardous waste facilities that transfer, store or dispose of solid or liquid waste classified in the Australian Dangerous Goods Code or medical, cytotoxic or quarantine waste that handles more than 1,000 tonnes per year of waste.*
>
> *(6) Development for the purpose of any other liquid waste depot that treats, stores or disposes of industrial liquid waste and:*
>
> *(a) handles more than 10,000 tonnes per year of liquid food or grease*

trap waste, or

(b) handles more than 1,000 tonnes per year of other aqueous or non-aqueous liquid industrial waste.

As indicated above, the proposed development will recycle more than 100,000 tonnes per annum of building and construction waste and, as such, is a *State significant development* for the purposes of State Environmental Planning Policy (State and Regional Development) 2011.

On the assumption that the Director-General concurs with our opinion that the proposed development is *State significant development*, we seek the requirements of the Director-General for the Environmental Assessment to be undertaken.

The key information requirements for the Environmental Assessment are:

1. Waste Management.

2. Stormwater and Wastewater Management.

3. Air Quality - Odour and Dust Management.

4. Noise Management.

The *Protection of the Environmental Operations Act 1997* requires an Environment Protection Licence to be obtained from the NSW Office of Environmental and Heritage for the carrying out of *scheduled development works* which would enable a *scheduled activity* to be carried out.

Schedule 1 of the POEO Act defines the following scheduled activities for which an Environment Protection Licence is required:

34 Resource recovery

(1) This clause applies to the following activities:

***recovery of general waste**, meaning the receiving of waste (other than hazardous waste, restricted solid waste, liquid waste or special waste) from off site and its processing, otherwise than for the recovery of energy.*

....

(2) However, this clause does not apply to any of the following:

(a) materials separation and sorting of less than 60 tonnes per year of waste lead acid batteries,

(b) the treatment of sewage within a sewage treatment system (whether or not that system is licensed),

(c) the recovery of stormwater.

(3) Each activity referred to in Column 1 of the Table to this clause is declared to be a scheduled activity if:

(a) it meets the criteria set out in Column 2 of that Table, and

(b) either:

(i) less than 50% by weight of the waste received in any year requires disposal after processing, or

(ii) the regulations under section 286 exempt the person carrying out the activity from the requirements of section 48 (2) as they apply to waste disposal (application to land), waste disposal (thermal treatment), waste processing (non-thermal treatment) and waste storage.

Table

Column 1	***Column 2***
Activity	***Criteria***
Recovery of general waste	*involves having on site at any time more than 2,500 tonnes or 2,500 cubic metres, whichever is the lesser, of waste* *involves processing more than 120 tonnes of waste per day or 30,000 tonnes of waste per year*

The proposed project would fall within the above category of Resource Recovery and, as such, an Environment Protection Licence is required to operate the proposed activity.

Should additional information be required, please do not hesitate to contact Mr Neil Kennan of this office.

Yours faithfully,
NEXUS ENVIRONMENTAL PLANNING PTY LTD
per:

Neil Kennan