URBIS

SUMMARY OF SUBMISSIONS: INDUSTRY AND GOVERNMENT

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
1.	191736	Parramatta Climate Action Network	Objection	• States that the EIA includes misleading information – use of the term 'green and renewable' energy when referring to incineration of fossil fuel based materials such as plastics and wood.	• **Section 7.18.7**- Concept of EfW as 'green, renewable' Energy
				• Argues that removal of trees will add to climate change and increase the temperature in the area.	• **Section 6.9:** Biodiversity and Offsets
				• Concerned with excessive pollution within the Sydney Basin and location within proximity to residential areas and schools will result in adverse health effects.	• **Section 6.11:** Health Impacts • **Section 6.12.4:** Reduced Air Quality
				• Concerned that Blacktown is an area with high rates of cardiovascular disease, and incinerator emissions will only increase these rates further.	• **Section 7.1.2** – Specific Health Concerns
				• Notes that for Australia to comply with its international obligation under the Stockholm Treaty on Persistent Organic Pollutants it should not approve any waste incinerators.	• **Section 7.13.2**- Stockholm Convention
				• Concerned that approximately 0.3 ha of Cumberland Plain Woodland and 3 ha of Eucalyptus Riverflat forest are proposed to be cleared for the development. Many vulnerable and endangered animals live in this area land clearing will further threaten these animals. Recommends that these areas should be protected.	• **Section 6.9.2:** Ecological Offset Strategy • **Section 3.2:** Vegetation Retention

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• EfW Facility is a potential offensive industry. As offensive industry is prohibited on the site, there is no power under the Environmental Planning and Assessment Act 1979 to approve the development.	• **Section 6.3.1** – Land Use and Zone Objectives • **Section 6.3.2-** Characterisation of Development
2.	194827	Allens (on behalf of Jacfin)	Objection	• The Amended EIS does not include any genuine consideration of alternative locations for the EfW Facility.	• **Section 6.3.3** – Site Suitability
				• The failure to considered alternative locations is contrary to the requirements of the requirements of the Director-General's Environmental Assessment Requirements (DGRs) for the development.	• **Section 6.3.3** – Site Suitability
				• No adequate assessment of alternative locations or consideration for likely future land uses surrounding the development.	• **Section 6.3.3** – Site Suitability
				• Overstates the advantages associated with potential synergies between the Genesis MPC and EfW Facility.	• **Section 6.3.3** – Site Suitability
				• Approx. 77% of waste to be sourced from other sites. The locations of these other sites are not identified and there is therefore no opportunity to assess whether a facility in an alternative location may in fact be more proximate to other significant waster operations that will be supplying the EfW.	• **Section 6.3.3** – Site Suitability • **Section 4.1.1**- Waste Types • **Section 6.6.1-** Waste Source and Composition
				• Genesis MPC is also not licensed to receive contaminated waste such as the ash residue that will be generated by the EfW facility.	• **Section 6.3.2-** Characterisation of Development

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Ash residue will need to be transported to appropriately licenced third party landfills, rather than to the Genesis MPC.	• **Section 6.6.4-** By-product: Treatment and Destination
				• Does not properly consider the likely future use of our client's land south of the development site, as required by SEPP 33.	• **Section 6.2.1.1-** Consistency with SEPP33
				• Failed to take into consideration a relevant matter as prescribed by SEPP 33.	• **Section 6.2.1.1-** Consistency with SEPP 33
				• Did not consider alternative sites as a means of minimising potential health and amenity risks.	• **Section 6.3.3** – Site Suitability • **Section 7.3.3**- Alternative Site Location
				• Technical reports amended as part of the amended EIS (with the exception of the Air Quality and Human Health Risk Assessment Reports) do not include any substantive re-assessment of the impacts of the EfW Facility.	• **Section 4.6-** Updated Technical Reports

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• The Proponent has not undertaken any additional noise or odour modelling to take into account the changes to the design brief for the project. Other than acknowledging the change to design capacity and proposal for construction to occur in two phases, the Odour Impact Assessment Report is essentially the same as the odour assessment exhibited in 2015.	• **Section 4.6.6-** Noise and Vibration Assessment: Pacific Environment • **Section 4.6.7-** Odour Assessment: Pacific Environment • **Section 6.16-** Noise Impacts • **Section 6.20-** Odour
				• The proposal does not meet the minimum employment density target of 45 jobs per hectare for the site.	• **Section 6.2.1.2** - Consistency with SEPP WSEA (2009)
				• Concerned the EfW facility is inconsistent with the character of surrounding development, including the Eastern Creek Business Park.	• **Section 6.3.3** – Site Suitability • **Section 6.15-** Design Quality and Visual Amenity
				• Concerns around the process proposed for sorting and mixing waste is inherently unreliable and that it will be practically impossible for a crane driver to effectively identify and separate different waste types. This presents an unacceptable risk.	• **Section 6.6.3**- Waste Mixing and Homogenisation

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Concerns around the ability to accurately measure air quality and human health impacts given unreliability of fuel mix.	• **Section 4.4.1-** Waste Types • **Section 6.12.1**- Accuracy of Air Quality Data • **Section 6.11-** Health Impacts
				• Deficiencies in the Air Quality Impact, Greenhouse Gas Assessment, and Ozone Impact Assessment: - *failure to account for the 60 hours of upset conditions that are expected to occur per annum, and associated underestimation of the ground-level concentrations and deposition rates of air pollutants.* - *selection of only a small number of sparsely distributed receptor locations on the Jacfin land, which are not necessarily representative of the maximum impact of the EfW Facility on that land.* - *unrealistic characterisation of the meteorological conditions at the site.* • *inconsistencies in the data presented.*	• **Section 4.5.1-** Upset Scenarios • **Section 4.6.4-** Air Quality and Greenhouse Gas Assessment: Pacific Environment • **Section 6.12.1-** Accuracy of Air Quality Data • **Section 6.12.2-** Scenario Modelling and Upset Conditions • **Section 6.13-** Greenhouse Gas Emissions
				• States that the EfW facility will exceed the prescribed limits under the *Protection of the Environment Operations (Clean Air) Regulation 2010.*	• **Section 6.12.3-** Australian and NSW Policy Context and Protection •

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				- Insufficient information in the amended EIS for the assessment of human health impacts of the EfW facility. Information provided indicates that there are significant risks to human health.	• **Section 6.11-** Health Impacts • **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017
				• The risks associated with the EfW Facility in an emergency situation highlight the inappropriateness of locating a facility of this nature in close proximity to residences and workplaces. Recommends location with an increased buffer zone to residences and workplaces.	• **Section 6.19:** Preliminary Hazard Analysis
				• Concerns associated with fire risk.	• **Section 6.19:** Preliminary Hazard Analysis • **Section 9**- Environmental Mitigation Measures
				• Deficiencies in Odour Impact Assessment. Concerns that odour levels have been significantly underestimated.	• **Section 4.6.7-** Odour Assessment: Pacific Environment • **Section 6.20**- Odour

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Concerns associated with impacts on Eastern Creek Business Park in relation to odour and noise.	• **Section 4.6.6-** Noise and Vibration Assessment • **Section 6.16:** Noise Impacts • **Section 4.6.7-** Odour Assessment: Pacific Environment • **Section 6.20**- Odour
				• Deficiencies in Noise Impact Assessment. Concerns that noise modelling is not detailed and exceeds the Eastern Creek Precinct Plan noise requirements.	• **Section 4.6.6-** Noise and Vibration Assessment • **Section 6.14**- Noise Impacts
				• Concerns surrounding visual impact of the EfW facility associated with bulk and scale of buildings. Landscaping is not sufficient to mitigate these impacts.	• **Section 6.15.2-** Visual Amenity
				• Traffic Impact Assessment relies on a number of assumptions which are unreliable and the site layout presents a poor traffic safety outcome due to the failure to separate access for light and heavy vehicles.	• **Section 6.18-** Traffic and Parking Impacts
				• Concerned the proposal does not meet the required infrastructure requirements or provide enough detail in relation to potable water, location of the new 132kV transmission line to transfer electricity, and the management of stormwater.	• **Section 6.10.2-** Water Availability and Capacity of Infrastructure

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Additional 614 vehicle movements per day on external roads. This is based on an assumption that all deliveries will be nominally 22 tonnes for all waste types. This assumption is not correct. The amended EIS indicated that deliveries to the Genesis MPC are currently undertaken by a combination of light, medium and heavy vehicles, with some loads as small as one tonne. Deliveries are certain to include the same variety of sizes, with the result that there are likely to be substantially more vehicles movements to and from the facility than assumed.	• **Section 6.18.1-** Impact of Additional Truck Movements
				• Poor traffic safety outcome due to the failure to separate access for light and heavy vehicles.	• **Section 6.18-** Traffic & Parking Impacts
				• Noise assessment does not provide clear information for noise sources, noise source locations and sound power levels and thus has not been conducted at an appropriate level of detail.	• **Section 4.6.6**- Noise and Vibration Assessment: Pacific Environment • **Section 6.16**- Noise Impacts
				• Low frequency noise has been underestimated and may exceed EPA's intrusive noise criterion as low frequency noise has not been modelled.	• **Section 4.6.6**- Noise and Vibration Assessment: Pacific Environment • **Section 6.16**- Noise Impacts

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Noise assessment does not demonstrate noise mitigation measures has been considered, and thus the noise non-compliance is unacceptable.	• **Section 4.6.6**- Noise and Vibration Assessment: Pacific Environment • **Section 6.16**- Noise Impacts • **Section 9:** Environmental Mitigation Measures
				• Odour assessment does not consider the delivery of waste via truck as a potential odour source or the cumulative odour in the project area, therefore odour assessment is inadequate. • No consideration is given to the odour emission rate when the facility may not be operational or during upset conditions • More than one odour sample is needed to adequately assess odour impacts- therefore comprehensive odour sampling program has not been undertaken • Contradicting opinion- Odour assessment states project would be greatest contributor to offsite odour emissions, which contradicts opinion in Stage 6 of Odour Assessment	• **Section 4.5.1**- Upset Scenarios • **Section 4.6.7**- Odour Assessment: Pacific Environment • **Section 6.20**- Odour

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• There is not confirmation from Sydney Water that there is sufficient supply for the development from existing waste mains and reservoirs. There is also no confirmation as to whether this facility would compromise the supply to the already extensively developed area of the Easter Creek Business Hub. • Insufficient assessment of the potential impact of contaminated runoff to infiltrate into groundwater. • Insufficient information and justification of parameter values, assumptions and modelling result to assess the specified runoff rates, volumes and water quality outcomes.	• **Section 6.10.2-** Water Availability and Capacity of Infrastructure • **Section 6.10.1-** Stormwater • **Section 6.10-** Soil and Water
				• The proponent has not demonstrated that is has the experience of capability to appropriately manage the facility. • If appropriately managed by an experienced operator, there are some situations beyond the control of even the most experienced operator, such as power failure or equipment failure, which could have catastrophic impacts. • Foreseeable risk of waste igniting in the waste bunker or in a truck. • Uncontrolled burning of waste at the EfW Facility would undoubtedly lead to substantial exceedances of the EPAs ground level air quality criteria for toxic air pollutants.	• **Section 6.19**- Preliminary Hazard Analysis • **Section 6.5**- Operation • **Section 6.12.2-** Scenario Modelling and Upset Conditions • **Section 4.6-** Updated Technical Reports
				• Adoption of NOx control technology, facility will be 7th greatest emitter of NOx in Sydney, which will be even higher with upset emissions- which the ozone assessment has not considered	• **Section 4.5.1**- Upset Scenarios • **Section 6.12.2**- Scenario Modelling and Upset Conditions

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Air quality assessment has underestimated the potential health risk as the upset conditions have not been accounted for, during the upset period the emissions from the facility exceed the standards prescribed in the Clean Air Regulation.	• **Section 4.5.1**- Upset Scenarios • **Section 6.12.2**- Scenario Modelling and Upset Conditions • **Section 6.11**- Health Impacts • **Section 6.12.3**- Australian and NSW Policy Context and Protection
		Katestone		• Annual average concentrations of air pollutants have not included potential effect of upset conditions which would double predicted ground level concentrations of pollutants.	• **Section 4.5.1**- Upset Scenarios • **Section 6.12**- Air Quality Impacts
				• The assumptions and emissions used for upset conditions in air quality study are inconsistent with supporting information at page B6 of Appendix.	• **Section 4.5.1**- Upset Scenarios • **Section 6.12.2**- Scenario Modelling and Upset Conditions
				• No quantitative record of waste fuel quality and no way of managing chlorine levels	• **Section 4.1.3**- Waste Audits
				• Potential to generate toxins which are known carcinogens, studies have not demonstrated facility can be operated without causing adverse impacts	• **Section 6.11-** Health Impacts • **Section 7.1.2-** Specific Health Concerns

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• No clear characterisation of proposed waste fuels	• **Section 6.6.1**- Waste Source and Composition • **Section 4.6.1-** Project Definition Brief Ramboll • **Section 6.6 -** Waste Source and Composition
				• HHRA possibly underestimated carcinogenic and non-carcinogenic risks as it has not accounted for upset emissions	• **Section 6.11-** Health Impacts • **Section 4.5.1**- Upset Scenarios • **Section 6.12.2**- Scenario Modelling and Upset Conditions • **Section 4.6-** Updated Technical Reports
				• AEIS failed to demonstrate facility can be operated and maintained to not cause adverse health impacts	• **Section 6.11-** Health Impacts • **Section 6.19**- Preliminary Hazard Analysis • **Section 6.5**- Operation

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Modelling approach possibly resulted in underestimation of annual average concentrations of air pollutants and meteorological conditions at the site as it is unlikely to realistically characterise atmospheric structure	• **Section 6.12.1**- Accuracy of Air Quality Data
				• Odour sampling program has not been undertaken • Reports have not provided predictions at discrete locations on Jacfin land • AERMOD model used to make predictions of odour concentrations is not suitable for light wind conditions that occur at subject site • More than one odour sample needs to be taken to compensate for the large source area • Possible odour levels have been underestimated as they failed to address waste fuel variability and upset conditions • Odour assessment is deficient as it does not consider loading, transport and unloading of waste, the impact of operational shutdown, the emission rate when the facility may not be operational or during upset conditions, and all potential odour sources around the site- such as Genesis Building and outside waste storage	• **Section 4.6.7-** Odour Assessment: Pacific Environment • **Section 6.20**- Odour • **Section 4.6-** Updated Technical Reports
				• Concerns associated with additional air pollution in the area.	• **Section 6.12.4**- Reduced Air Quality
				• EIS has not confirmed the forecast emissions are valid and attainable.	• **Section 6.12** – Air Quality Impacts • **Section 4.6-** Updated Technical Reports

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
3.	190791	Starlights Netball Club, Blacktown	Objection	• Concerned that unscreened waste will be processed. Without a screening process, hazardous waste materials such as asbestos and gas bottles may go undetected, resulting in both environment and health problems.	• **Section 4.3**- Asbestos • **Section 6.6-** Waste Source and Composition
4.	191167	Parliament of NSW – 3 x MPs	Objection	• Recommends that all waste should be properly screened, including physical sorting and not just visual inspection through the Genesis Xero Waste plant before arriving in the EfW plant.	• **Section 6.6-** Waste Source and Composition
				• Waste will bypass the nearby Genesis Xero Waste Plant.	• **Section 4.1**- Waste Source and Composition
				• Not satisfied that the potential health impacts of this plant have been adequately identified and addressed.	• **Section 6.11 –** Health Impacts • **Section 4.6-** Updated Technical Reports
				• States that the proposal will not achieve the required employment targets for a project of this size, in accordance with the Broader Western Sydney Employment Area Draft Structure Plan.	• **Section 6.2.1.2** - Consistency with SEPP WSEA (2009)
				• Concerned that there has not been an adequate level of community engagement in this process due to the hurried nature of this proposal.	• **Section 6.4.1**- Community Engagement
				• No specific issue.	• N/A
				• Civil dispute matter – N/A.	• **Section 6.21.4**- IGGC Submission

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
5.	187861	Hillsong Connect Group	Objection	• Concerned with greenhouse gas emissions. Incinerating waste has been shown to produce far more carbon dioxide per unit of energy generated than coal, oil or gas fired power stations and thus the claim that this is 'green' energy is simply marketing spin.	• **Section 6.13** – Greenhouse Gas Emissions • **Section 7.18.7-** Concept of Energy from Waste as 'Green, Renewable' Energy.
6.	183383	IGGC P/L	Objection	• Notes the impact on air quality far outweighs any marginal impact on greenhouse gas emissions from an environmental point of view	• **Section 6.13** – Greenhouse Gas Emissions
7.	191414	Greens NSW	Objection	• States the EfW facility will be surrounded by the residential areas of Minchinbury, Mt Druitt and Rooty Hill, with the closest residential area to the facility only about one kilometre to the north. Considers this is an unacceptable health burden to place on residents, particularly as Western Sydney already bears an unfair burden of air pollution.	• **Section 6.11**- Health Impacts • **Section 6.12.4-** Reduced Air Quality
				• Queries how residents we be compensated for installing effective air filtering systems and out-dated air conditioning units for days when pollution levels are high.	• N/A – Not a relevant planning consideration.
				• Concerned the proposal will encourage burning waste simply for the sake of meeting the demand required to fuel the facility once it has been built.	• **Section 6.7-** Waste Source Availability
				• Concerned the incinerator will create 400,00 tonnes of waste ash and a further 51,700 tonnes of toxic "residues" which will need to go to standard landfill each year.	• **Section 6.6.4**- By-product Treatment and Destination
				• Concerns associated with toxic waste being dumped in the Eastern creek landfill, leaving a hazardous legacy for future generations	• **Section 6.6.4**- By-product Treatment and Destination

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Concerned that disposing of hazardous waste is an expensive business and this creates a significant incentive to skirt environmental and health regulations in order to dispose of these wastes in cheaper ways.	• **Section 6.6.4**- By-product Treatment and Destination
				• Concerned with highly hazardous and toxic ash that will require secure landfill and pose risks to workers, the community, and the environment for decades.	• **Section 6.6.4**- By-product Treatment and Destination • **Section 6.19-** Preliminary Hazard Analysis
				• Concerned with the expected contaminate profile of all ash residues.	• **Section 6.6.4**- By-product Treatment and Destination
8.	191606	National Toxics Network	Objection	• Recommends that the community consultation programme be revisited with all updated and revised project information.	• **Section 6.4.1** - Community Engagement
				• Recommends that an ash residue management plan and ongoing monitoring is undertaken for independent assessment.	• **Section 6.6.4** – By-Product: Treatment and Destination
				• Argues that comparisons with the EU are not valid given the waste management policy context of Australia.	• **Section 6.12.3**- Australian and NSW Policy Context and Protection
				• Recommends that a full policy framework for sustainable waste management in Australia (including air quality standards) is developed prior to the approval of the EfW facility.	• **Section 6.12.3**- Australian and NSW Policy Context and Protection

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Recommends that an emergency and fire action plan is provided and approved by relevant authorities.	• **Section 7.4.5-** Safety Risks • **Section 4.6-** Updated Technical Reports
				• Concerned with air emissions including nanoparticles of toxic heavy metals.	• **Section 6.11.1**- Particulate Matter: Nano-particulates. • **Section 7.2.2**- Uncertainty of Emissions Profile
				• Concerned that burning resources stifles resource sustainability initiatives and costs jobs in the recycling and product reuse industries.	• **Section 6.7.1-**- Monopolisation of the Waste Industry and Reduction in Recycling
9.	185285	The Colong Foundation for Wilderness Ltd	Objection	• States Australia's natural resources need to be conserved through reuse, recycling and composting schemes, not burnt and destroyed.	• **Section 6.7.1**- Monopolisation of the Waste Industry and Reduction in Recycling
				• Concerned with the facilities proximity to Prospect Reservoir as this poses an unacceptable risk to that water body and its future use as a raw source of drinking water.	• **Section 6.3.3**– Site Suitability • **Section 7.3.2-** Proximity to Prospect Reservoir

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				Waste Management Concerns • Only half of the waste fuel will be sourced from the neighbouring Genesis Xero Waste plant.	• **Section 4.1-** Waste Source and Composition • **Section 4.6-** Updated Technical Reports
				• Concerned that waste may contain hazardous material such as asbestos, which should otherwise be sent to landfill.	• **Section 4.3**- Asbestos
10.	188212	Blacktown City Council	Objection	• Recommendation that each load of waste should undergo a thorough sort as opposed to a visual inspection.	• **Section 6.6.3-** Waste Mixing and Homogenisation
				• Concerned that paper, garden waste etc is being added to the fuel stream. More information is required.	• **Section 6.6-** Waste Source and Composition
				• States that approval of the EfW facility should be contingent on the construction of an undercover pre-sort centre as lodged and approved under the Genesis Xero Waste Plant.	• **Section 4.1-** Waste Source and Composition
				• Seeks clarification on the source of the remainder of waste.	• **Section 6.6.2**- Waste Audits
				Environmental Concerns • Argues that projections for future changes to available tonnages of material should be provided.	• **Section 6.7-** Waste Source Availability • **Section 4.4**- Waste Availability • **Section 4.6-** Updated Technical Reports

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Greater detail, including sources of data and assumptions should be provided in relation to feedstock.	• **Section 6.6**- Waste Source and Composition • **Section 6.6.2**- Waste Audits • **Section 4.6-** Updated Technical Reports
				• States that procedures for complying with the NSW EPA Energy from Waste Policy are not sufficiently detailed.	• **Section 4.2.1-** NSW EfW Policy
				• States the air quality assessment requires a more detailed investigation based on the following: - Clarity on emission limits and the averaging times for these limits within the emission modelling. • Clarity on the actual fuel and performance of all proposed emission control measures.	• **Section 4.6.4-** Air Quality and Greenhouse Gas Assessment: Pacific Environment • **Section 6.12.1**- Accuracy of Air Quality Data • **Section 4.6-** Updated Technical Reports
				• Odour assessment should provide more information on building ventilation as relevant to the management of fugitive odours.	• **Section 6.20** - Odour
				- HHRA report considered inaccurate given the stack parameters not being updated as part of the amended EIS.	• **Section 6.12.1-** Accuracy of Air Quality Data • **Section 4.6-** Updated Technical Reports

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Further assessment of low frequency noise impacts is recommended.	• **Section 4.6.6**- Noise and Vibration Assessment: Pacific Environment • **Section 6.16** – Noise and Vibration Impacts • **Section 4.6-** Updated Technical Reports
				• Insufficient detail provided to support the direct discharge of groundwater wells to the ropes Creek tributary and to support dewatering activities to facilitate excavations below the water table.	• **Section 6.10-** Soil and Water
				• Recommended that further information is provided in regards to surface water quality and groundwater quality. Additional baseline monitoring should be undertaken.	• **Section 6.10-** Soil and Water
				• Stack plume rise needs further assessment to determine if there is any change to ensure that airspace navigation will not be adversely impacted.	• **Section 6.17.1** – Airspace Management (OLS) • **Section 4.6-** Updated Technical Reports
				Zoning Concerns • Electricity generating works are prohibited in the IN1 General Industrial Zone, except when the zone objectives can be satisfied. The proposal is inconsistent with the zone objectives and is therefore not capable of being approved.	• **Section 6.3.1 –** Land Use Zone and Zone Objectives

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				Biodiversity Concerns • Concerns surrounding the impact on native vegetation.	• **Section 6.9** – Biodiversity and Offsets
				• Argues that the proposal should be referred to the Commonwealth Office of Environment and Heritage under the EPBC Act 1999.	• **Section 6.9**- Biodiversity and Offsets
				• States that the local occurrence of River-flat Eucalypt Forest (RFEF), being a subset of Cumberland Plain Woodland which is listed as endangered under State legislation, is 4.18 ha and the proposal is to remove 2.89 ha. This will place the local occurrence of RFEF at risk of extinction.	• **Section 6.9.2-** Ecological Offset Strategy • **Section 3.2**- Vegetation Retention
				• Recommends that the RFEF should not be removed for the sake of providing substantial temporary laydown pads.	• **Section 3.2-** Vegetation Retention • **Section 3.2.1**- Reduced Laydown Pads
				Design Concerns • Argues that the proposal does not represent a high standard of development to meet the urban design objective of the IN1 General Industrial zone.	• **Section 6.15**- Design Quality and Visual Amenity
				• Recommends undertaking an Architectural Design Competition for the envelope of the building.	• **Section 6.15**- Design Quality and Visual Amenity • **General**- N/A

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				General Environmental and Community Concerns • General concerns related to the operation of the EfW facility if approved, including: - Waste management. - Air quality and monitoring. - Greenhouse gas concerns. • Human health concerns and monitoring.	• **Section 6.15**- Design Quality and Visual Amenity • **General**- N/A • **Section 4.4**- Waste Source Availability • **Section 6.7**- Waste Source Availability.
				EPA Licensing Concerns • States that the plant must meet the EPA's Eligible Waste Fuels Guidelines.	
				- Needs to demonstrate that it will be using current international best practice techniques, and ensure that toxic air pollutants and particulate emissions are below levels that may pose a risk of harm to the community or environment.	• **Section 6.8**- Adequacy of Technology • **Section 6.12.3**- Australian and NSW Policy Context and Protection
				Subdivision Concerns • States the proposed subdivision is satisfactory subject to conditions.	• **Section 3.5-** Subdivision
				Drainage Concerns • States that the stormwater drainage and water cycle management concept can be made to comply with the Precinct Plan.	• **Section 6.10.1-** Stormwater

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				Aboriginal Heritage Concerns • Recommends that a Construction Environmental Management Plan be provided prior to commencement of works identifying the location of the conservation areas designated for a keeping place for artefacts retrieved during the works. An Operational Environmental Management Plan is to be developed to ensure that appropriate measures are in place for the treatment and ongoing safekeeping of the Aboriginal heritage in the area.	• **Section 6.21.1-** Aboriginal Heritage
				Road Concerns • No objection - states that all road construction is to occur in accordance with RMS Road Design Standards and Council's Engineering Guide for Development 2005.	• N/A- **General comment**
				Section 94 Contributions • Section 94 contributions are payable for this development.	• **Section 3.4-** Subdivision
				Airspace Implications • The proposal will have implications on the proposed Western Sydney Airport airspace operation.	• **Section 6.17**- Airspace Operations
				• There is insufficient detail contained in the EIS to support direct discharge to Ropes Creek Tributary	• **Section 6.10.1**- Stormwater
				• Further information is required regarding surface water quality and ground water quality. Baseline monitoring should be undertaken to allow appropriate pre-development and operational monitoring requirements.	• **Section 6.10** Soil and Water

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
		BCC Attachment 1		• It is assumed that the Proponent has obtained agreement from the Department as to the continuing validity of the DGRs, however it is noted that many of the guidelines listed in the DGR have since been revised or replaced.	• **Section 8**- Updated Response to DGR's
				• The DPE should consider the consistency of the proposal against the Land Use and Infrastructure Strategy and Draft District Plan.	• **Section 6.2-** Planning and Legislative Framework
				• EIS does not consider Clause 24 of SEPP (WSEA) 2009.	• **Section 6.2.1.2-** Consistency with SEPP WSEA (2009) • **Section 3.4-** Subdivision
				• Concerned the facility does not consider specific development contributions	• **Section 3.4**- Subdivision
				• An air-cooled condenser (ACC) has been proposed as the main cooling system. This may not be best practice. Air cooling reduces the efficiently of the plant, particularly during summer time.	• **Appendix D** – Project Definition Brief
				• In terms of plume rise - flaws with the Manins et al 1992 approach. These errors would underestimate the buoyancy of the plumes for each of the 4 ducts and the errors also compound one another.	• **Section 4.6-** Updated Technical Reports
				• Improvements in waste management is necessary in order to achieve a circular economy, however paper also acknowledges the role of Waste to Energy facilities in this transition.	• **N/A**- General comment

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Lack of detail on pollutants, emissions and monitoring of air quality, EPA needs to develop new emission standards, need to conduct a period of air quality monitoring for a year to obtain accurate baseline data	• **Section 6.12.1**- Accuracy of Air Quality Data • **Section 6.12.2**- Scenario Modelling and Upset Conditions
		BCC Attachment 2		• Proposal is inconsistent with zone objectives- site is zoned in part IN1 General Industrial and E2 Environment Conservation, location and design fails to achieve high standard of development, lack of flood monitoring, salinity and stormwater treatment concerns, site contamination validation report should be undertaken	• **Section 6.3.1 –** Land Use Zone and Zone Objectives • **Section 6.10-** Soil and Water • **Section 6.10.1-** Stormwater
		BCC Attachment 3		• Inability to guarantee procedures and processes for the storage of waste, fail to adequately address waste management issues (sources, sorting processes, incineration of un-recyclable material, plan for ash recycling), proponent needs to obtain ISO 14001 environmental certification to demonstrate facility is best practice, need to demonstrate using best international practice	• **Section 4.2-** Adequacy of Technology • **Section 6.6.4-** By-product: Treatment and Destination
				• Source of the waste is not indicated	• **Section 4.1-** Waste Source and Composition • **Section 4.6-** Updated Technical Reports

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Concerns over the accuracy of health assessment and whether NSW Health has reviewed and assessed the proposal	• Refer NSW Health: Western Sydney Local Health District Submission • **Section 6.11**- Health Impacts
				• No updated flood modelling has been provided, no details provided for public access to proposed precinct basin. Amended stream erosion index calculations need to be provided. Need to prepare and amend a stormwater management plan for the site, and prepare a flood impact study to assess flooding impacts.	• **Section 6.10.1** Stormwater • **Section 6.10.4-** Flooding • **Section 4.6-** Updated Technical Reports
				• Gaps in acoustic assessment	• **Section 6.16-** Noise Impacts • **Section 4.6.6:** Noise and Vibration Assessment: Pacific Environment
				• Lack of commitment of applicant to establish community liaison group, visitor information centre, funding of community upgrades, community open day and forums, Community Liaison Group needs to be established, payment of a host fee to council is necessary to respond to impact of the facility on the community.	• **Section 6.4.1**-Community Engagement
				• Lack of applicant's response to Council's design concerns	• **Section 6.15.1**- Architectural Design

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Need to confirm if technology is appropriate in an Australian setting, need to demonstrate commitment to research and implementation of new technology as they emerge	• **Section 6.8**- Adequacy of Technology
				• Potential impact on aviation airspace, therefore consent should not be approved until the OLS for the Western Sydney Airport is released	• **Section 6.17.1**- Airspace Management (OLS)
				• Must meet EPA Eligible Waste Fuels Guidelines	• **Section 4.4**- Waste Source Availability.
				• Operational Environmental Management Plan should be developed to ensure ongoing safekeeping of Aboriginal heritage, Construction Environmental Management Plan should be provided signifying location of conservation areas	• **Section 6.21.1**- Aboriginal Heritage
				• Detailed plans for bioretention system and demolition basin should be submitted for review, street tree planting system be submitted for review and proposal, no irrigation on nature strip, only trees in development footprint be assessed for removal, all trees in areas designated future development be retained	• **Section 3.3-** Civil and Stormwater Management • **Section 3.2-** Vegetation Retention • **Section 3.2.2**- Ecological Offset Strategy
				• Lack of information on where carbon/methane by products will be disposed of.	• **Section 6.6.4-** By-product: Treatment and Destination
				• Notes that the EfW facility will seriously compromise heath of the residents of Western Sydney.	• **Section 6.11**- Health Impacts

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
11.	183412	Mulgoa Valley Landcare Group	Objection	• Lack of accurate predication of health and environmental impacts considering other comparative developments have occurred in Europe where the climate is significantly different to that of Western Sydney.	• **Section 6.11**- Health Impacts • **Section 4.2.1-** Reference Facilities
				• Increased truck movements on Western Sydney roads that will contribute to air pollution, traffic congestion and exacerbate the 'heat sink' phenomenon in Western Sydney.	• **Section 6.14.1**- Western Sydney Heat Sink
				• Lack of proponent to identify the cumulative impacts of this heat generating activity with that of the approved Badgerys's Creek Airport.	• **Section 7.2.3**- Cumulative Impact on Air Quality
				• Recommends that sensors in the stacks and furnace be installed with the data provided directly to the Environmental Protection Agency (EPA).	• **Section 6.12.3-** Australian and NSW Policy Context and Protection
				• Concerned about the potential health and safety impact to staff (of nearby distribution centre – over 500m away) as a result of the operations.	• **Section 7.3.1**- Proximity to Sensitive Receivers
12.	189443	McKees Legal Solutions	Objection	• Concerns raised regarding the type of waste to be incinerated and the safety measures to ensure emissions are not harmful to human health.	• **Section 4.1-** Waste Source and Composition • **Section 7.4.5-** Safety Risks
				• Lack of any catastrophic modelling. Explosions, implosion or some form of catastrophe there is no modelling to determine the radius and type of impact possible. Need for detailed catastrophic modelling	• **Section 4.5.1-** Upset Scenarios

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Failure to Notify nearby businesses	• **Section 6.4.1** –Community Engagement
				• May cause disruption to Pepkor South East Asia disruption centre which is not acceptable.	• **Section 6.3.3**- Site Suitability
				• Concerned with additional truck movements within the locality.	• **Section 7.6.1**- Impact of Additional Vehicles on Congestion
				• Concerned with noise impacts created by the proposed development together with the additional truck movements	• **Section 6.16-** Noise Impacts • **Section 7.11.4-** Traffic Noise
				• Argues that the EfW facility promotes more waste generation rather than reduction	• **Section 6.7.1**- Monopolisation of the Waste Industry and Reduction in Recycling
				• The proposal will have a negative impact on property values in the host region in suburbs such a Minchinbury, Erskine Park, St Clair and Colyton.	• **Section 6.21.2**- Land Values
13.	193821	NSW Legislative Council	Objection	• The financial burden of the development of this facility should not be borne by the local community but there is currently no proposal to compensate existing residents for the inevitable reduction in their amenity and property values.	• **Section 6.21.2**- Land Values • **Section 7.8.2-** Compensation

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Concerns with human health. The information provided in the human health risk assessment has led to the Western Sydney Local Health District stating that is does not support the approval of the proposal in its current form, as it was "unable to fully determine the proposed facilities actual or potential impact on human health"	• **Section 4.6.5-** Human Health Risk Assessment: AECOM • **Section 6.11**- Health Impacts
				• Requests that Next Generation cease making false and misleading statements in relation to Greenpeace's position on incineration. States that Greenpeace is and always has been opposed to the incineration of waste.	• **Section 6.21.3-** Greenpeace Submission
				• Recommends that should consent be granted, construction noise monitoring and ongoing air quality monitoring should be undertaken, to ensure compliance with operational air quality and emission criteria.	• **Section 9-** Environmental Mitigation Measures
14.	193808	Greenpeace	Objection	• Argues the application has not demonstrated that the proposal will not result in significant visual impact when viewed from Erskine Park. In particular properties 7-10 Hocking Place & 167-187 Swallow Drive, Erskine Park	• **Section 6.15.2**- Visual Amenity
15.	194814	Penrith City Council	Objection	**Community Comments** • Location and in particular the proximity to residential areas and sensitive sites such as schools and sporting fields is not appropriate	• **Section 7.3.1**- Proximity to Sensitive Receivers
				• Concerns with the air quality modelling which was used to inform the experts reports including the calculations of emissions and how they considered existing ambient air quality levels	• **Section 6.12**- Air Quality Impacts • **Section 6.12.1** Accuracy of Air Quality Data

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Concerned with the implications of methane production from placing the waste in landfill versus the amount of carbon dioxide which would be produced from its combustion.	• **Section 6.13-** Greenhouse Gas Emissions
				• The levels of Dioxin, Nano Particles and particulate matter <2.5umm which would be resultant in the local area.	• **Section 6.11.1**- Particulate Matter: Non-particulates • **Section 7.1.5-** Dioxins
				• The ability of the EPA to manage this development in the future given its track record with odour management in the area	• **Section 6.20**- Odour • **Section 9**- Environmental Mitigation Measures
				• The extent of notification which was undertaken.	• **Section 6.4.1**- Community Engagement
				• The number and location of truck movements	• **Section 4.6.5**- Updated SIDRA Modelling • **Section 6.18**- Traffic and Parking Impacts
				• The SSD process resulting in the State Government removing decision making from Council and the Community	• **Section 6.4.2**- Project Classification and Timeframes
				• The length of process to assess the application and uncertainty regarding the outcome	• **Section 6.4.2**- Project Classification and Timeframes

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Impacts on water supply and reservoirs	• **Section 6.10.2**- Water Availability and Capacity of Infrastructure • **Section 7.3.2-** Proximity to Prospect Reservoir
				• The proposed temperature of the incineration process being lower than in European examples	• **Section 4.2.1**- Reference Facilities • **Section 6.6.3**- Waste Mixing and Homogenisation
				• Concerns around the plant shutting down at 39 degrees which is common in Western Sydney and then producing higher emission level at re-commencement	• **Section 7.15.2**- Facility shutdown at 37 degrees
				• Compliance history of the parent waste management company and previous breaches at other locations	• **Section 6.5**- Operation • **Section 7.9.1**- History of EPA Breaches
				• The type of waste entering the facility and accuracy of the proposal visual screening process to ensure compliance	• **Section 4.1**- Waste Source and Composition • **Section 6.6**- Waste Source and Composition

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Concerns with the amended Human Health Risk Assessment based upon technical data assumptions which are based on feedstock which is not detailed in full.	• **Section 4.1**- Waste Source and Composition • **Section 6.6**- Waste Source and Composition • **Section 6.11**- Health Impacts • **Section 4.6-** Updated Technical Reports
				• The implications of methane production from placing the waste in landfill versus the amount of carbon dioxide which would be produced from its combustion	• **Section 6.13-** Greenhouse Gas Emissions
				• The amended Human Health Risk Assessment (HHRA) is based upon technical data assumptions and associated stack emission calculations which are in turn dependent upon parameters such as feedstock. The Jacobs review identified that references provided in the report for various fuel types are of a confidential nature and only available to the EPA and DPE. There, a completed, thorough and rigorous assessment with considerations of all available information pertaining to the operation of the facility is required to be undertaken by the EPA	• **Section 4.1**- Waste Source and Composition • **Section 6.6**- Waste Source and Composition • **Section 4.6.5:** Human Health Risk Assessment: AECOM, September 2017

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				Additional information required: • The applicant is requested to provide an electronic copy of the SIDRA 6 modelling of the surrounding intersections, in particular the Wallgrove Road and Wonderland Drive intersection, to allow further assessment of the traffic impacts of the proposal.	• **Section 4.6.11-** Updated SIDRA Modelling, Traffix • **Section 6.18.4**- RMS Concerns
				• Further clarification is requested from the applicant regarding the proposed future access to Archbold Road. The applicant is requested to align the proposal with the revised RMS intersection location so that the development is consistent with the RMS concept design for Archbold Road.	• **Section 6.18.4**- RMS Concerns
16.	194993	Roads and Maritime Services	Comments	• Further clarification is requested from the applicant regarding the proposed access road from Honeycomb Drive. Road design details should be provided for assessments.	• **Section 6.18.4**- RMS Concerns
				• Argues the source of waste is unclear and the inability of the applicant to guarantee procedures and processes that satisfactorily demonstrate how all waste will be appropriately sorted.	• **Section 6.6**- Waste Source and Composition • **Section 9**- Environmental Mitigation Measures
				• No provision of quality longitude data on the impact to a persons' health, particularly in relation to the health of children.	• **Section 6.11**- Health Impacts • **Section 7.1.7-** Children's Health
17.	191003	Minchinbury Public School	Objection	• Current state environmental legislation will not provide the community with sufficient protection from its likely emissions.	• **Section 6.12.3-** Australian and NSW Policy Context and Protection

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Refer to community submissions	• **N/A-** Proforma Submission
				• Recommends that additional land containing endangered ecological communities be retained within the development footprint and/or offsite offsets provided.	• **Section 3.2**- Vegetation Retention
18.	190761	Resident supporting Blacktown City Council submission (proforma letter)	Objection	• Considers that if options for onsite offsetting are limited or not feasible, then an effort to secure offsite offsets should be made and documented. DPE should be satisfied that all reasonable attempts have been made to procure offsite offsets.	• **Section 3.2.2**- Ecological Offset Strategy
19.	195001	Office of Environment and Heritage	Comments	• Concerned with the level of Dioxin-like substances in the Sydney air shed in the HHRA	• **Section 6.11**- Health Impacts • **Section 7.1.5**- Dioxins
				• Why is Hydrogen Fluoride not included in the Ambient Air Quality NEPM? What is the long-term effects of this chemical at a variety of measurable levels on both a) human health and b) the environmental (both water and air).	• **Section 6.11-** Health Impacts • **Section 6.12**- Air Quality Impacts
20.	190593	Karma Waters	Objection	• Why are multiple exposure pathways analysis tests not being used for all the dioxin-like substances and heavy metals that can accumulate in the air for such a project?	• **Section 6.11-** Health Impacts
				• The current NHMRC draft document refence from 2010 is not considered relevant.	• **Section 6.11-** Health Impacts

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• What are the long term plans to mitigate the threats to human health within a span of approximately 50kms, listing each mitigatory implement per/km.	• **Section 6.11**- Health Impacts • **Section 9**- Environmental Mitigation Measures
				• Why not all of the metals listed in Section 2.1 are listed in Section 2.2 – what is the reason? Why are these metals no longer being considered? Please table a chart of all metals expected to be used and their long term effects on both a)human health and b) the environmental.	• **Section 4.6-** Updated Technical Reports
				• Will you take full responsibility for infant mortality and deformity due to the contaminants likely to be ingested in the breast milk of the affected mothers?	• **Section 6.11**- Health Impacts • **Section 9**- Environmental Mitigation Measures
				• Poor assessment, poor testing, poor and gross miscalculations and the cumulative and detrimental effect this proposal will have on human and environmental health.	• **Section 6.12.1-** Accuracy of Air Quality Data • **Section 6.11**- Health Impacts • **Section 4.6.5:** Human Health Risk Assessment: AECOM, September 2017
				• Why is Hydrogen Fluoride not included in the Ambient Air Quality NEPM? What is the long-term effects of this chemical at a variety of measurable levels on both a) human health and b) the environmental (both water and air)	• **Section 6.12**- Air Quality Impacts

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Paragraph justifying using only the USEPA IRIS as a source of toxicity refence values for individual chemicals. This is not in line with Australia guidance – why have you therefore chose USEPA IRIS as a source?	• **Section 6.12**- Air Quality Impacts
				• Seriously comprise amenity of the residents of Western Sydney.	• **Section 7.18.2**- Quality of Life
				• No comments as there are no current mineral, coal or petroleum titles over the site.	• **N/A**
				• The proposal is not consistent with over 100 years of environmental regulation to improve urban air quality by removing incinerators and power stations and other sources of pollutants from urban areas.	• **Section 6.12.3**- Australian and NSW Policy Context and Protection
21.	194995	Department of Industry	Comments	• With respect to the calculation of final ground level concentrations, we note that the same stack parameters and the same in-stack concentrations are used as in the previous risk assessment, and yet there is a 10 fold decrease in the calculated ground level concentrations.	• **Section 4.5-** Scenario Modelling • **Section 6.12.1**- Accuracy of Air Quality Data • **Section 6.19**- Preliminary Hazard Analysis
22.	195777	NSW Health Western Sydney Local Health District	Objection	• The differences in feedstock and relationship to air quality is not addressed. The feedstock for this incinerator will have large amounts of building waste and car flock in addition to putrescible waste. Similar incinerators in the UK and Europe have a very different feedstock due to better recycling efficiencies.	• **Section 4.1**- Waste Source and Composition • **Section 4.2.1**- Reference Facilities

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Recommends that the riparian corridor along the Ropes Creek Tributary should be protected and rehabilitated with fully structured local native vegetation (trees, shrubs and groundcover species).	• **Section 3.2.3**- Riparian Revegetation
				• Further details required regarding the potential salinity impacts of constructing the basin in the riparian corridor if high salinity levels are found in the area.	• **Section 6.10-** Soil and Water
23.	194999	Department of Primary Industries	Comments	• In relation to groundwater the proposed mitigation measures should include a program of baseline groundwater monitoring prior to commencement of works. Monitoring should be continued during construction and during the operation phase of the project. The monitoring should relate to water levels and water quality and be used to develop a Trigger Action Response Plan for any adverse events.	• **Section 6.10-** Soil and Water • **Section 9-** Environmental Mitigation Measures
				• Should dewatering for temporary construction works exceed 3 ML/year, the proponent must obtain a licence from DPI Water under Part 5 of the Water Act 1912.	• Noted.
				• The assessment of emissions from waste incineration has been undertaken based on a theoretical design fuel composed of numerous waste streams with different but specific carbon make up. The resulting emissions estimation may not be conservative if the fuel contains a lower carbon content and/or high content of fossil derived carbon than the assessed design fuel.	• **Section 3**- Proposed Project Amendments • **Section 4.1**- Waste Source and Composition • **Section 4.1.3**- Waste Audits • **Section 4.6-** Updated Technical Reports

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• The estimation of grid emissions is highly dependent on the input values and assumptions and some of the facility design information used in the GGA is not referenced or justified.	• **Section 4.6-** Updated Technical Reports
24	197270	EPA Attachment A- Review of Greenhouse Gas Assessment	Objection	• Use of the current Scope 2 emission factor for NSW results in a slightly lower value for CO2-e diverted from the main electricity grid and therefore an estimated increase in net GHG emissions produced by the facility. This emission factor is also expected to continue to decrease over time.	• **Section 6.13**- Greenhouse Gas Emissions
				• The estimation of GHG emissions diverted from landfilling is likely to significantly overestimate these emissions by assuming no methane emissions generated by landfilled waste will be combusted. An updated GGA should be provided.	• **Section 6.13**- Greenhouse Gas Emissions • **Section 4.6.2-** Air Quality and Greenhouse Gas Assessment: Pacific Environment
				• The GHG emissions diverted from landfilling has effectively doubled by use of a less conservative value for the fraction of degradable organic carbon in the waste. The use of the DOC fraction value should be clearly justified.	• **Section 6.13**- Greenhouse Gas Emissions • **Section 4.6.4-** Air Quality and Greenhouse Gas Assessment: Pacific Environment
				• GGA must justify changes to assumptions to demonstrate it is robust and conservation in its overall estimation of net emissions.	• **Section 4.6.4-** Air Quality and Greenhouse Gas Assessment: Pacific Environment

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				Waste Source Availability • Does not consider the estimates in the National Waste Report 2013 to be an appropriate and accurate source of information to extrapolate available tonnages for the facility.	• **Section 4.4**- Waste Source Availability • **Section 4.6.1-** Project Definition Brief: Ramboll, September 2017
				• Concerned that the quantities of waste required for the facility will result in market monopolisation of available residuals for any current or future investment in recovery and processing facilities.	• **Section 6.7.1-** Monopolisation of the Waste Industry and Reduction in Recycling
24.		Attachment B (Energy from Waste Policy)		• Recommends an in-depth assessment from the proponent on this matter to ensure there is sufficient available waste for the facility.	• **Section 4.4**- Waste Source Availability
				Waste Source Composition • Concerned that the proposed design fuel mix contains multiple categories that do not provide clear information of the material composition.	• **Section 4.1**- Waste Source and Composition • **Section 4.1.3-** Waste Audits
				• Concern surrounding the categorisation of *other combustibles* as this comprises a significant amount of waste.	• **Section 4.1**- Waste Source and Composition
				• Concerned with the risks presented by treated timber and the emissions to air. Notes that some treated timber cannot be identified by visual inspection.	• **Section 4.1.3**- Waste Audits

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Concerned the facility will only reach a temperature of 850 degrees Celsius. In Europe, timbers at risk of being treated with CCA and other chemicals are combusted at hazardous waste thermal treatment facilities operating at higher temperatures to ensure destruction of harmful compounds so that there are no harmful emissions.	• **Section 6.6.3-** Waste Mixing and Homogenisation
				• Soils are unsuitable for energy recovery.	• **Section 6.6.1**- Resource Recovery Criteria
				• Notes that landfillable materials that are currently being recycled will be used for energy recovery instead. This goes against the objectives of the energy from waste policy.	• **Section 6.7**- Waste Availability • **Section 6.7.1**- Monopolisation of the Waste Industry and Reduction in Recycling
				Resource Recovery Criteria • Resource recovery percentages have been miscalculated, using the National Waste Report recycling percentages to support use of the waste streams proposed. Statewide resource recovery rates or data limited to the regulated area of NSW cannot be used to justify the resource recovery rates of any particular facility.	• **Section 4.1.1**- Resource Recovery Criteria
				• Further evidence is required to demonstrate compliance with the Resource Recovery Criteria.	• **Section 4.1.1**- Resource Recovery Criteria

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				Reference Facility • The proposal has not met the requirement to have fully operational reference facility, and could therefore not prove that this technology can handle this waste stream at the capacity proposed. The EPA requires further information to ensure there will be no harm to human health or the environment.	• **Section 4.1.3-** Waste Audits • **Section 4.2.1-** Reference Facilities
				Technical and Thermal Criteria • Refer ARUP comments.	• **N/A**
				Reference Facilities • There is insufficient evidence that the proposed technology can operate successfully given the proposed levels (approx. 50%) of C&D feedstock waste. If a representative facility cannot be established, the proponent needs to clearly define and articulate the differences the proposed feedstock will cause in both process and emissions and demonstrate that any difficulties can be mitigated to ensure successful operation of the proposed facility.	• **Section 4.1.3-** Waste Audits • **Section 4.2.1-** Reference Facilities
				Material Availability • A detailed, evidenced-based, fully transparent explanation of how C&D residual waste composition has been calculated, including the recovery rates used, should be provided.	• **Section 4.1.3-** Waste Audits
		Attachment C - ARUP		• An evidence based description on what 'other' waste comprises of is required.	• **Section 4.1**- Waste Source and Composition • **Section 4.1.3-** Waste Audits

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• An evidence-based, transparent explanation on the actual available C&D waste tonnages suitable as feedstock that are available in the SMA area is required.	• **Section 4.4**- Waste Source Availability
				• An evidence-based justification needs to be given why the Proponent is assuming a waste growth rate from data that is over seven years old. The implications of a waste reduction rate needs to be fully considered with regard to long term waste availability. This could be demonstrated through a waste forecast model, which would estimate predicted waste tonnages over the planned operational period of the proposed facility.	• **Section 4.4**- Waste Source Availability • **Section 4.6.1:** Project Definition Brief: Ramboll, September 2017
				Material Composition • A detailed compositional breakdown of wood waste is required.	• **Section 4.1.3-** Waste Audits
				• Robust, evidence-based data is required to give a definitive detailed floc waste composition for Australia to allow for a comprehensive comparison to European floc waste.	• **Section 4.1.3-** Waste Audits
				• A detailed comparison of the process used in Australia and Europe to treat ELV is required including clear identification of any differences and the impact this may have on the generated floc.	• **Section 4.1.3-** Waste Audits
				• Identification of EfW facilities in Europe processing floc waste is needed, including composition, quantity and percentage floc waste in the overall waste stream. Consideration of any special operational or handling procedures employed at facilities accepting floc waste should also be articulated.	• **Section 4.1.3-** Waste Audits • **Section 6.19-** Preliminary Hazard Analysis
				• A definitive, evidence-based estimation of the percentage of different types of TWW in the waste feedstock is required.	• **Section 4.1.3-** Waste Audits

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Detailed acceptance procedures that will be employed at the facility to remove TWW from all waste sources that will be accepted are required.	• **Section 6.6.2-** Waste Audits • **Section 4.6.1:** Project Definition Brief: Ramboll, September 2017
				• If adequate removal of TWW cannot be guaranteed, provision of a combustion temperature of 1,100 °C for two seconds operation needs be re-considered.	• **Section 6.6.2-** Waste Audits
				• Scenario modelling of varying concentrations of TWW should be undertaken to demonstrate if TWW does enter the feedstock the threshold levels it will not have a significant negative impact in accordance with the EfW Policy.	• **Section 6.6.2**- Waste Audits • **Section 4.6.1:** Project Definition Brief: Ramboll, September 2017
				Proof of Performance • Detailed procedures required on how the proposed facility will be run during commissioning and operational phases by operational staff, including training requirements and qualifications.	• **Section 6.5**- Operation
				• The assessment of facility impacts may be unreliable as it is unclear how accurate the assumptions and input data used in the assessment are.	• **Section 4.6**- Updated Technical Reports • **Section 6.12.1**- Accuracy of Air Quality Data • **Section 6.11**- Health Impacts

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• The HHRA must be revised to ensure all parameters, input values and assumptions used are clearly identified, described, characterised, evaluated and quantified (where possible). The assessment must demonstrate and justify that the values used are robust and appropriate for their required purpose.	• **Section 6.11**- Health Impacts • **Section 4.6-** Updated Technical Reports
		Attachment D- HHRA		• Proper and efficient operation of the facility will be required to ensure assumptions incorporated into the assessment of risks to human health remain valid. Critical parameters and potential variability and uncertainty associated with these parameters must be identified, evaluated and applied or maintained.	• **Section 6.12.3**- Australian and NSW Policy Context and Protection • **Section 4.6.1:** Project Definition Brief: Ramboll, September 2017
				• Further demonstration that the flue gas treatment is able to effectively control all significant air pollutants to a compliant level including problematic wastes e.g. arsenic treated wood and floc waste	• **Section 4.5-**Scenario Modelling • **Section 4.6.1:** Project Definition Brief: Ramboll, September 2017
				• Revision of HHRA to clarify assumptions regarding start-up/shut-down and upset conditions are conservative and human health risk will not increase.	• **Section 4.5.5-** Upset Scenarios • **Section 6.11-**Health Impacts

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Uncertainty regarding emissions concentrate levels modelled, and if they are accurate and conservative given location and feedstock factors.	• **Section 6.12.1**- Accuracy of Air Quality Data • **Section 4.1.3**- Waste Audits • **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment
				• Emissions modelling of CoPC were based on significantly lower 'real world' in-stack concentration data provided by Ramboll, resulting in lower ground level concentrations and deposition estimates (and risk estimates) than those of the 2015 HHRA.	• **Section 6.11**- Health Impacts • **Section 4.6-** Updated Technical Reports
				• Emissions concentrations should be based on proposed emissions limits, rather than 'real world' stack concentrations which may significantly constrain facility operation.	• **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment
				• Discrepancies in HHRA and AQA in-stack concentrations and IED limits and no table of in-stack concentrations used for HHRA Scenario 2 in either HHRA or AQA.	• **Section 4.6-** Updated Technical Reports
				• Organic components/total organic emissions data is dated from the 1990's and may no longer be accurate. The HHRA should be updated to discuss this uncertainty.	• **Section 4.6.5:** Human Health Risk Assessment: AECOM, September 2017
				• Comparison of facility emissions with the Klemetstrud plant is unreliable as the sites have different air pollution control systems.	• **Section 6.8.1**- Reference Facilities

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Unclear how bromine content in the feed material will be maintained at low and consistent levels.	• **Appendix D-** Revised Project Definition Brief
				• Confirmation that assumed NOx emissions under upset conditions have been confirmed by HZI.	• **Section 4.5.1**-Upset Scenarios • **Appendix D-** Revised Project Definition Brief
				• Conservative assumption of 8,000hr annual operation figure results in the modelled average GLC predictions not being applicable. A scenario of 8,760 hours per year is more conservative.	• **Section 4.5**- Scenario Modelling • **Appendix D-** Revised Project Definition Brief
				• Only four CoPC were considered in Scenario 2 which is an underestimated risk.	• **Appendix D-** Revised Project Definition Brief
				• No emissions modelling from tipping hall during negative pressure- despite the increased potential for fugitive and odorous emissions.	• **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment • **Section 4.6.7:** Odour Assessment: Pacific Environment
				• Uncertainty regarding stack parameters used for dispersion modelling (Table 7 Section 3.4) due to incorrect referencing.	• **Section 6.12.2**- Scenario Modelling and Upset Conditions

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Clarify why OEH St Marys 2010- 2012 data was not used in the evaluation of the chosen 2013 data and provide additional information to verify the 2013 St Marys meteorological data is representative of long term meteorology at the site and suitable for use.	• **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment
				• Revise HHRA to include quantities data from the air dispersion modelling to demonstrate deposition of air pollutants within the catchment of Prospect Reservoir will not be significant enough to warrant further consideration.	• **Section 4.6.5:** Human Health Risk Assessment: AECOM, September 2017
				• Revise HHRA to demonstrate screening criteria used have been appropriately evaluated and applied.	• **Section 4.6.5:** Human Health Risk Assessment: AECOM, September 2017
				• Reference background allocation for all CoPC	• **Section 4.6.5:** Human Health Risk Assessment: AECOM, September 2017
				• Clarify why air-to-leaf transfer has not been considered as a means of accumulation in edible plants.	• **Section 6.11**- Health Impacts • **Section 4.6-** Updated Technical Reports
				• Clarify why the grid maximum locations differ for Scenarios 1 and 2	• **Section 4.6.5:** Human Health Risk Assessment: AECOM, September 2017

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Revise terminology to clearly describe the ground level concentrations used in the HHRA.	• **Section 4.6.5:** Human Health Risk Assessment: AECOM, September 2017
				• Mix of waste is different to the other facilities considered in the assessment. As the CoPCs were selected based on these other facilities, the suitability of the CoPC assessed is required to be further justified.	• **Section 6.8.1-** Reference Facilities • **Section 4.6-** Updated Technical Reports
				• Use of mix of wastes introduces a large range of variability into the process i.e. no consistency in feedstock.	• **Section 6.6.3-** Waste Mixing and Homogenisation
		Attachment E – EnRiskS – HHRA		• Demonstrate a significant margin of safety between what an assessment estimates and what might happen at the facility	• **Section 4.5-** Scenario Modelling • **Section 4.5.1**- Upset Scenarios
				• Undertake various sensitivity assessments as part of the AQIA and HHRA using the same calculations as undertaken for the assumed emissions from the plant but assume what might happen if the uncommon waste types are included i.e. use of car flock and the much greater proportion of construction and demolition waste or if one or more of the process controls managing the feedstock fail (e.g. CCA treated timber not being removed from the waste).	• **Section 4.5.1**- Upset Scenarios • **Section 4.6-** Updated Technical Reports

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Scenario 2 - only some (not all) NSW EPA regulatory limits assessed	• **Section 11-** Health Impacts • **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017
				• Scenario 2 - only looked at relevant chemicals listed in the regulations	• **Section 11-** Health Impacts • **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017
				• Scenario 1 and Scenario 2 - particulate matter concentrations increase by 150% between Scenario 1 and Scenario 2, and this increase has not been discussed.	• **Section 11-** Health Impacts • **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017
				• Scenario 3 - a consistent ten-fold increase in CoPC concentrations in Scenario 3 does not may a lot of sense given that different types of failures can occur in the plant which will affect different groups of chemicals differently.	• **Section 11-** Health Impacts • **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Scenario 3 - GLC were only assessed against acute criteria, however, these short-term increases in concentration have the potential to increase the overall annual average - a worst-case assessment using the upset conditions estimates for the assumed maximum time per year the plant could operate under upset conditions and the annual average for the rest of the year to calculate a weighted annual average for Scenario 1 and Scenario 2.	• **Section 4.5.1**- Upset Scenarios • **Section 6.11-** Health Impacts • **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017
				• Ramboll Environ memo dated 13 September 2015 - this memo is quite short and does not explain in sufficient detail how and why particular chemicals have been included, particularly the list of chemicals covered under VOCs. The memo from 2015 uses some information to identify a list of chemicals and the proportion each will contribute to the total VOCs estimate. Unfortunately, the information used is not readily available and appears to be in German so it cannot be reviewed.	• **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017 • **Section 4.6.1:** Project Definition Brief: Ramboll, September 2017
				• Ramboll Environ memo dated 13 September 2015 - some of the chemicals listed are not well supported. For the list of chemicals included as VOCs, some of the chemicals listed are not actually volatile so they cannot be measured by the VOC analysis. Also, some of the chemicals listed are not named correctly so it is difficult to be confident that the correct chemical is being assessed (the names used could refer to multiple individual chemicals). The memo also lists the proportions used to estimate the concentrations of each of the listed compounds based on the VOC concentration in the stack but without sufficient explanation and evidence.	• **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017 • **Section 4.6.1:** Project Definition Brief: Ramboll, September 2017

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• The approach adopted for assessing chromium is reasonable (as consistent with the approach adopted by the UK EA). However, there are additional uncertainties in applying it to this facility given the different mix of waste used and the potential for higher levels of metals in such wastes. Calculations for additional scenarios should have been undertaken as part of a sensitivity analysis to determine if the assumption about the proportion of chromium VI affected the risk estimates.	• **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017
				• Uncertainty regarding the composition of phthalates. To address this lack of certainty about which chemicals may be present in the emissions, a sensitivity analysis should have been included in the HHRA looking at how much the risk estimates might change depending on which phthalates or related chemicals may actually be present in the air emissions.	• **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017
				• Ramboll Environ memo dated 20 October 2016 - the memo doesn't add any explanation as to why the chemicals listed in the original CoPC memo, that were not evaluated for the Canadian facility, still need to be evaluated for this facility nor is any additional evidence provided the support the proportions of each of the VOCs proposed in the original CoPC memo which is what has been requested. Some CoPC listed in the Canadian facility journal article are more likely to be emitted (e.g. formaldehyde, ethylbenzene) compared to those listed in the original.	• **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017 • **Section 4.6.1:** Project Definition Brief: Ramboll, September 2017

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• The in-stack concentrations listed in Appendix G of the AQIA were the same as those listed in Appendix B of the Ramboll Environ memo dated 19 October 2016 even though the memo was based on a total VOC concentration for the reference plant(s) of 1.2mg/m3. This plant is predicted to emit much lower amounts of VOC - 0.015mg/m3 (Table 7-4, AQIA). It was assumed that the values used in the modelling would have been scaled to the total VOC for this specific plant i.e. VOC emissions are estimated to be 80x lower than the reference facility. This would have reduced the in-stack concentrations that should have been modelled in this.	• **Section 4.6-** Updated Technical Reports
				• The information presented in the Ramboll Environ memo dated 19 October 2016 indicates that the listed chemicals only made up about 25% of the measured concentrations of total VOCs. So 75% of the total VOC likely to be present in the stack have not been identified and have not been included in the evaluation used in the HHRA. There is also no discussion about the unidentified 75% of VOCs.	• **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017 • **Section 4.6.1:** Project Definition Brief: Ramboll, September 2017
				• Ramboll Environ memo dated 19 October 2016 - some of the chemicals listed as present in the higher proportions are the chemicals that are less toxic and are, in fact, not volatile (e.g. various acids). No further information has been supplied in this assessment to explain why these chemicals remain in the list at the proportions originally proposed (using the Canadian facility does tend to indicate.	• **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017 • **Section 4.6.1:** Project Definition Brief: Ramboll, September 2017

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• In the dispersion model, in-stack concentrations were based on real data measured at four similar plants and from available literature. Using measured data from plants that do not use the same wastes as feedstock provides no room for understanding variability in the emission from the proposed plant. Such variability is likely at this facility due to the larger volume of waste.	• **Section 4.2.1**- Reference Facilities • **Section 4.6-** Updated Technical Reports
				• Estimated ground level concentrations varied between the AQIA prepared in October 2015 and the AQIA prepared in October 2016. However, it was noted that there were no changes to the stack engineering parameters or meteorological conditions between the updated reports. So the changes in concentrations are not due to any additional refinement or optimisation of the engineering of the stack.	• **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment
				• HHRA refers to titanium whereas the AQIA refers to thallium.	• **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017 • **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment
				• HHRA has effectively considered all chromium being discharged from the facility in the form of chromium VI. This is conservative.	• **N/A-** Comment

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Appendix C of Ramboll Environ memo dated 19 October 2016 lists ranges of measured VOC emission data to be 0.03 to 5mg/m3 and Appendix B has a VOC concentration listed for the plant from which the breakdown of individuals in 1.2mg/m3. In Table 7-4 of the AQIA, the VOC concentration listed for in-stack for this facility used for modelling of normal operations was 0.015mg/m3. This value is half the lowest value that was measured for any of the listed plants. This extremely low value shows that the modelling has not used the maximum value measured at the reference facilities.	• **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017 • **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment
				• UK EA have published guidance about levels of metals in emissions from waste incineration. Version 3 of this guidance was published in 2012 (as used in this assessment) and Version 4 was published in 2016. The new version of the guidance lists higher emissions for some metals.	• **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017 • **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment
				• Dispersion modelling of ground level concentrations during the operation of diesel generators in isolation of other sources is not worst case scenario.	• **Section 6.12.2**- Scenario Modelling and Upset Conditions
				• Compliance of diesel generators in addition to the EfW facility with the NO2 impact assessment criteria is unclear as a total NO2 concentration is not provided.	• **Section 6.12-** Air Quality Impacts
			Attachment F- AQA and Ozone	• Uncertainty regarding the suitability of the proposed secondary combustion chamber minimum flue gas temperature of 850 degrees.	• **Section 6.6.3**- Waste Mixing and Homogenisation

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• No suitable reference facility in terms of feedstock, throughput and technology. It is unproven that the proposed EfW facility will achieve best practice emissions control.	• **Section 6.8.1**- Reference Facilities • **Section 4.6.1:** Project Definition Brief: Ramboll, September 2017
				• All pollutants of concern were not included in the ambient impact assessment.	• **Section 6.12**- Air Quality Impacts • **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment
				• Further justification on the appropriateness of AERMOD as a dispersion model as it does not explicitly consider calm conditions.	• **Section 6.12**- Air Quality Impacts • **Section 6.12.1**- Accuracy of Air Quality Data
				• A revised assessment should be provided which includes an emissions scenario which adequately represents the expected performance of the facility. As there are no existing facilities using the same fuels as the proposed EfW facility, such an emissions scenario should be based on performance guarantee and proposed fuel type in line with the Approved Methods.	• **Section 6.12.2-** Scenario Modelling and Upset Conditions • **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment • **Section 4.6.1:** Project Definition Brief: Ramboll, September 2017

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Emissions rates and concentrations must be presented for all pollutants of concern for the proposed EfW facility and all Clean Air Regulation pollutants.	• **Section 6.12.3**- Australian and NSW Policy Context and Protection • **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment
				• All pollutants of concern not modelled for predicted ground level concentrations in all three scenarios e.g. chlorine	• **Section 6.12.2**- Scenario Modelling and Upset Conditions • **Section 4.1.3-** Waste Audits
				• Further discussion on how vapour phase metals will be controlled and manufacturers performance guarantees to demonstrate the control efficiency.	• **Section 4.6.1-** Project Definition Brief: Ramboll, September 2017 • **Section 4.6.4-** Air Quality and Greenhouse Gas Assessment: Pacific Environment, September 2017
				• The Odour Assessment should include an assessment of all existing and likely future sensitive receptors defined in the Approved Methods.	• **Section 6.20**- Odour Impacts • **Section 4.6.7:** Odour Assessment: Pacific Environment
				• EIS does not provide the requested reports, ADI 1995 and ADI 1998	• **Section 6.10**- Soil and Water

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
				• Clarification should be added to the Soil and Water Impacts assessment to detail any water treatment that will be carried out prior to discharge	• **Section 6.10**- Soil and Water
			Attachment G- Soil and Water	• A diagrammatic location (location plan) of the sampling points should be provided.	• **Section 6.10**- Soil and Water
				• Assessment should be amended to include a full list of the heavy metals being test. The term 'total heavy metals' is ambiguous and should be replaced with either 'unfiltered heavy metals' or 'total concentration of heavy metals'	• **Section 6.10**- Soil and Water
				• Justification of why groundwater was not tested.	• **Section 6.10**- Soil and Water
				• Hardness correction of heavy metals is problematic as it does not protect all aquatic species. Hardness correction using extreme hardness is also problematic as background hardness is not well established. Hardness correction should not be used for any heavy metals.	• **Section 6.10**- Soil and Water
				• Notes that airspace procedures will not be adversely impacted by the EfW facility.	• **N/A-** General comment
				• Acknowledges that emissions from the development would not penetrate the proposed Western Sydney Airport OLS. Recommends that if the emission design parameters for the facility change, a revised plume rise assessment should be undertaken.	• **Section 6.17** – Airspace Operations

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
25.	194997	Airservices Australia	Comments	• Argues that the GGA overestimates emissions from landfills which results in a doubling of net GHG emissions prevented compared to estimate of the previous GGA.	• **Section 4.5.1**- Upset Scenarios • **Section 6.11-** Health Impacts • **Section 6.13** – Greenhouse Gas Emissions • **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017 • **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment
26.		Department of Infrastructure and Regional Development	Comments	• The assessment of emissions from waste incineration has been undertaken based on a theoretical design fuel composed of numerous different waste streams with different but specific carbon and chemical makeup. The resulting emissions estimation may not be conservative due to operational discrepancy in fuel makeup.	• **Section 4.5.1**- Upset Scenarios • **Section 6.11-** Health Impacts • **Section 6.13** – Greenhouse Gas Emissions • **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017 • **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment

No.	DPE Ref No.	Name	Submission Position	Issue(s) Raised	Response/Reference
27.		EPA (Greenhouse Gas Assessment)	Objection	• The estimation of grid submissions substituted by the facility is highly dependent on the input values and assumptions used. • Some of the facility design information used in the GGA is not referenced or justified. • Use of the current Scope 2 emission factor for NSW results in a slightly lower value for CO2-e diverted from the main electricity grid and therefore an estimated increase in net GHG emissions resulting from the facility. This emission factor is also expected to reduce over time which will reduce the benefit of facility substituting emissions. • Advises the estimation of GHG emissions diverted from landfilling is likely to significantly overestimate these emissions by assuming no methane emissions generated by landfilled waste will be combusted. • Requires the GGA incorporate an emissions estimation scenario that is more realistic with respect to landfill gas capture and treatment. • Estimation of GHG emissions diverted from landfilling has effectively doubled by use of a less conservative value for the fraction of degradable organic carbon (DOC) in the waste. • Requires the DOC fraction value used in the assessment is clearly justified as appropriate and conservative for use in the GGA. • Requires the GGA clearly justify changes to assumptions to demonstrate the GGA is robust and conservative with respect to the estimation of net GHG emissions resulting from the facility. • •	• **Section 4.5.1**- Upset Scenarios • **Section 6.11-** Health Impacts • **Section 6.13** – Greenhouse Gas Emissions • **Section 4.6.5-** Human Health Risk Assessment: AECOM, September 2017 • **Section 4.6.4:** Air Quality and Greenhouse Gas Assessment: Pacific Environment