Build something great™

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Pamela Morales
Planning Officer, Industry Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Pamela,

WIDEMERE RECYCLING FACILITY EIS - RESPONSE TO SUBMISSIONS

A detailed environmental impact statement (EIS) to support a development application to increase production at the Widemere Recycling Facility was lodged by Boral Recycling Pty Limited (Boral) with the Department of Planning and Environment (DP&E) in June 2015.

The proposed project details are as follows:

- increase processing capacity to 1,000,000 tpa;
- addition of new waste streams to the list of permitted wastes received at the facility to include ENM, tiles and masonry, quarry products, and wet concrete stirrer waste;
- realigning the southern portion of the perimeter haul road; and
- change the operating hours of the facility.

The EIS was placed on public exhibition from 4 June to 17 July 2015 and three submissions were received, all of which were from Government agencies. None of the submissions objected to the proposal. No submissions were received from the general community.

In accordance with DP&E's requirements, responses to the matters raised in submissions are detailed in Table 1 below.

Table 1 Response to submissions received on the Widemere Recycling Facility Environmental Impact Statement

Submissions received		Response
1	***Fairfield Council***	
	Traffic and Transport	
1.1	No significant adverse traffic or parking impacts anticipated.	Noted
	Air Quality and greenhouse gases	
1.2	Supports ongoing retention of the 2 dust deposition monitors located at the facility, with continued monitoring in accordance with the site's EPL.	The site's existing EPL only identifies ONE dust monitoring location. The site will be seeking to move the location of this monitor to the South Eastern boundary of the site when the license variation is requested post approval.
	Noise and Vibration	
1.3	Recommend an acoustic report is prepared and submitted to the EPA, which will include the following: • Noise measurements at nearest sensitive receivers as detailed in the EIS • Verification of compliance with noise criteria • Where criteria are exceeded, provide recommendations on how to reduce noise levels so that compliance is achieved • Document all noise complaints received	Noted. It is anticipated that DP&E will condition the requirement for a noise compliance report in the consent.
	Surface Water	
1.4	Removal of the volume and mass limits to the EPL is not supported due to impacts of floodwaters to the downstream community in	This statement is contrary to the EPA submission. Section 11.3.6 of the EIS and the corresponding Surface Water Assessment, clearly identifies that as the southern

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Submissions received		Response
	Prospect Ck.	boundary of the site is elevated above the PMF level for Prospect Creek, the proposal would not "reduce storage, obstruct overland flow or worsen downstream flooding in the Prospect Creek floodplain". Additionally, the proposal would not worsen downstream flooding for events up to, and including, the 100 year ARI (see Section 11.3.6 ii).
1.5	A change to the existing EPL format for conditions on Volume and Mass limits is recommended	Noted
1.6	Need to demonstrate how they will meet the Concentration limits within the EPL, now and after the proposal's implementation.	See EPA notes below
	Other matters	
1.6	Minimal biodiversity impact noted, with the removal of 12 regrowth Casuarinas).	Noted.
2	***RMS***	
2.1	RMS reviewed the submitted documentation and raise no objection to the application.	Noted.

3	***EPA***	
	Air	
3.1	It has not been clearly articulated that best practice management measures have been adopted for all sources	Best practice management measures have been detailed in Section 7.4 of the Air Quality Impact Assessment as follows: • Level 2 (>2L/m2) water spraying of the unsealed roads • Stockpile water sprays • Limiting vehicle speeds to 30km/hr • Sweeping paved surfaces • Water sprays at crushing and screening plant and blending plant • Enclosure of crushing and screening plant ad blending plant
3.2	Require proponent to prepare and implement an Air Quality Management Plan (AQMP), which includes: i. Proactive and reactive management strategies ii. For all pollutant emission sources, as minimum: - KPIs for emission controls - monitoring methods - response mechanisms - responsibilities - record keeping compliance reporting	Noted
3.3	Within 6 months of commencing operations, undertake an independent site audit to identify all fugitive particulate matter emission sources and benchmark the mitigation measures against best practice	As the site already undertakes (and proposes to continue) an air quality monitoring program, as well as implementing an overall site environment management plan, there seems no purpose to this request. Additionally, the site is well situated in an industrial precinct, well clear and buffered from any sensitive receivers, such as residences.

Noise

3.4	Does compliance with the noise criteria depend on the modelled bunds and stockpiles, which provide mitigation to surrounding sensitive receivers from operations?	Bunds and stockpiles were not included in the noise model replicating a worst case scenario, and allowing the site flexibility for stockpile placement.
3.5	General terms of approval for noise:	Noted

Location	Day	Evening	Night	SD Lmax	Morning
71 Munro St	39	38	35	45	39
146 Daruga Ave	35	35	35	45	35
R10	39	37	35	45	39

3.6	Above limits apply under all meteorological conditions except where wind is above 3m/s, stability class F temperature inversions and winds greater than 2m/sec, and stability class G temperature inversions.	Noted
3.7	Compliance with above limits to be validated: • 6 months after the licence has been varied, or at any time requested by EPA; • At each location in above table; and For 3 consecutive operating days.	Noted
3.8	A noise compliance report to be submitted within 30 days of the completion of the validation monitoring.	Noted
	Water	
3.9	Prepare a Surface Water Monitoring and Mitigation Program to	Noted

	formalise the water management commitments in the EIS and address potential water quality issues to the satisfaction of the EPA.	
3.10	Define the volume and concentration limits for controlled discharges and maximise re-use.	Noted
3.11	Remove volume limits for uncontrolled discharges	Noted
3.12	Remove concentration limits for uncontrolled discharges.	Noted
3.13	Retain monitoring requirements for volume and pollutant concentration, pollutant load, sediment basin capacity, frequency of discharge, and rainfall depth to assess the need for further action or mitigation.	Note that the site is currently closed on Saturday and Sunday, and is proposed to be closed on Sundays. Monitoring will not take place when the site is closed.
3.14	Ensure that any flocculent product used to treat water before discharge from the premises has a 48-hour EC50 (immobilisation) for water fleas and a 96-hour EC50 (imbalance) for fish, greater than 100milligrams per litre.	Boral is happy to use approved flocculent agent. Investigation indicates that Damclear flocculent will meet the Consent Criteria.
3.15	The Surface Water Monitoring and Mitigation Program to include a process to re-establish the relationship between nephelometric turbidity units (NTU) and total suspended solids (TSS).	The current water quality program monitors NTU and TSS. Boral will develop a program to correlate NTU and TSS and make recommendation for future monitoring based on this.
3.16	The Surface Water Monitoring and Mitigation Program to include further information on the methods and chemicals used for pH adjustment	Noted
3.17	Proponent to carry out the Project generally in accordance with the EIS.	Noted
3.18	Proponent to comply with Section 120 of the POEO Act 1997.	Noted
3.19	Update and implement the Widemere Operational Environmental Management Plan in consultation with the EPA, including:	

	• Operation stage erosion, sediment and pollutant control measures for any areas that may be disturbed or may generate pollutants in stormwater runoff	Noted
	• A description and map of surface water and process water management, including the fate of pollutants in process water;	No need for this description. The site currently implements an inspection and receivals protocol. Raw material testing is in accordance with EPA's own Recovered Aggregate Order 2014, which includes 8 heavy metals, electrical conductivity and foreign material. Additionally, monthly testing for asbestos is undertaken.
	• Construction and operation management and response arrangements; and	Noted
	• A process for ongoing updates to the site water balance based on actual rainfall, discharge and reuse volumes and sediment basin levels.	The site currently has a Standard Operating Procedure for this.
3.20	Submit OEMP to EPA before commencement of operations of the expanded development.	Noted
3.21	Prepare a construction phase Erosion and Sediment Control Plan.	A full construction management plan is not considered necessary considering the very short construction timeframe (approximately one week)
3.22	Surface Water Monitoring and Mitigation Program (SWMMP) to include:	
	• A runoff program to establish the presence/risk posed by potential contaminants in accordance with ANZECC (2000) assessment criteria;	Boral proposes that an up-stream and down-stream monitoring program of Prospect Creek be developed, to determine the instream water quality of Prospect Creek and target action towards the ANZEEC Protection levels for Highly Modified Ecosystems.
	• An initial surface water quality characterisation assessment of water quality in sediment basins. Water quality monitoring to continue until EPA is satisfied that water quality is consistent with their respective design purposes and that surface water can be managed in accordance with EPL conditions.	Noted

• Potential contaminants of concern and monitoring frequency to be developed in consultation with the EPA taking into account but not limited to: - nutrients and pesticides in garden waste - hydrocarbons, PAHs and metals in asphalt waste - heavy metals from metal waste - associated toxicants, in addition to heavy metals, in metal wastes; - Chemicals used on site including cleaning chemicals, process chemicals, pesticides or herbicides, sediment basin flocculants - wet CBP stirrer waste (e.g. cement, chemical admixtures, fuels and lubricants) - ENM not clearly defined and the range of potential contaminants may be variable - treatment chemicals in timber (e.g. copper, chromium, arsenic)	Metal waste is stored on site in bins which are removed off site for recycling. Stirrer waste is diluted concrete agitator washout, and hence has no lubricant and fuel contamination. ENM accepted on site has to comply with EPA's excavated natural material order 2014. Timber and garden waste not proposed to be accepted at the future facility, therefore no need to include in the monitoring program.
• A process to revise flocculent usage as per 3.14 above • An assessment of the potential impact of discharges on receiving waters with reference to ANZECC (2000) assessment criteria • An investigation of all practical alternatives to discharge and whether sediment basins sizing, at source pollution controls, and other treatment and reuse options are appropriate for meeting EPL conditions. • A revision of the relationship between TSS and turbidity as	The results show that the facility would have a minimal effect on the frequency of predicted discharge events and the proposed water usage compared to the existing development scenario. The site currently re-uses water wherever possible, such as for dust suppression and re-use in the blending plant.

	per 3.15 above. • A review of methods and chemicals used for pH adjustment in sediment basins.	The Surface Water assessment found that even if the site had significantly greater storage capacity, it still would be unable to meet the discharge limit on some occasions. As such, there are no other practical alternatives other than continued water re-use available to the site.
3.23	SWMMP to be prepared and submitted to EPA for approval before commencement of expanded operations	Noted
3.24	Following the characterisation of potential contaminants, EPA may require:	Noted
	• An assessment of potential leakage of the sediment basis to groundwater	The main potential pollutants from the site, i.e. pH, Total Suspended Soils and Turbidity, do not easily migrate into the groundwater. The sediment basins onsite hold water and are the main water source for dust suppression onsite.
	• A further program of monitoring after a specified time period to address water quality issues that may emerge over time and as new activities on site are established.	Noted – if the site varies what is received on site, the corresponding monitoring protocol will be varied also.

Should you have any further questions related to the information provided in this letter please do not to hesitate to contact the undersigned on (02) 9033 5546.

Yours faithfully

Kate Jackson
Project Manager, Planning and Development
Boral Property Group