22 March 2017

Our ref: 2315946
Your ref: 2315946

Kate Masters
Senior Planning Officer
Department of Planning and Environment
Level 22, 320 Pitt Street
Sydney NSW 2000

Dear Kate

RMT SSD-6619 Preliminary Environmental Assessment

GHD on behalf of Renewed Metal Technologies would like to request to amend the SEARs issued in September 2014 (SSD-6619). Attached is a Preliminary Environmental Assessment, which outlines the changes between the previous proposed expansion requested in 2014 and the new proposed modification.

We trust there is sufficient information for the assessment of the modification however if there are any questions from DP&E or other departments please feel free to contact me via email or phone.

Sincerely

GHD Pty Ltd

Belinda Fourie

Senior Environmental Consultant

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Renewed metal technologies

Enirgi Power Storage Consolidation Project

Preliminary Environmental Assessment

March 2017

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1. Introduction

1.1 Overview

Renewed Metal Technologies (RMT) is proposing to develop the Enirgi Power Storage Consolidation Project (the project). The project involves an expansion of the existing used lead acid battery (ULAB) recycling facility at Bomen, to allow a consolidation of all RMTs battery recycling facilities in NSW at a single location.

The facility currently processes around 70,000 tonnes per annum (tpa) of ULABs to produce a range of products from soft lead and lead alloy products, in addition to other products such as sodium sulphate and polypropylene. The project involves expanding the existing operations to achieve a production capacity 120,000 tpa, within the approved site boundary for the existing facility.

The project site is located at 509 Byrnes Road, Bomen, approximately 10 kilometres northeast of Wagga Wagga in the Riverina region of NSW. The project is located on lot 21 DP850711 with the entire lot being 9.8 ha. The project site is restricted to approximately 5 ha (see Figure 1-1) in the northern portion of the lot corresponding to the consent boundary for the original development application and Environmental Impact Statement for the facility prepared in 2005. The current building is around 5,500 m^2, which contains an enclosed plant including battery bunker, CX area, crystallisation area, scrubbing system, 2 furnace, foundry area, 2 baghouses, refinery and slag demolition.

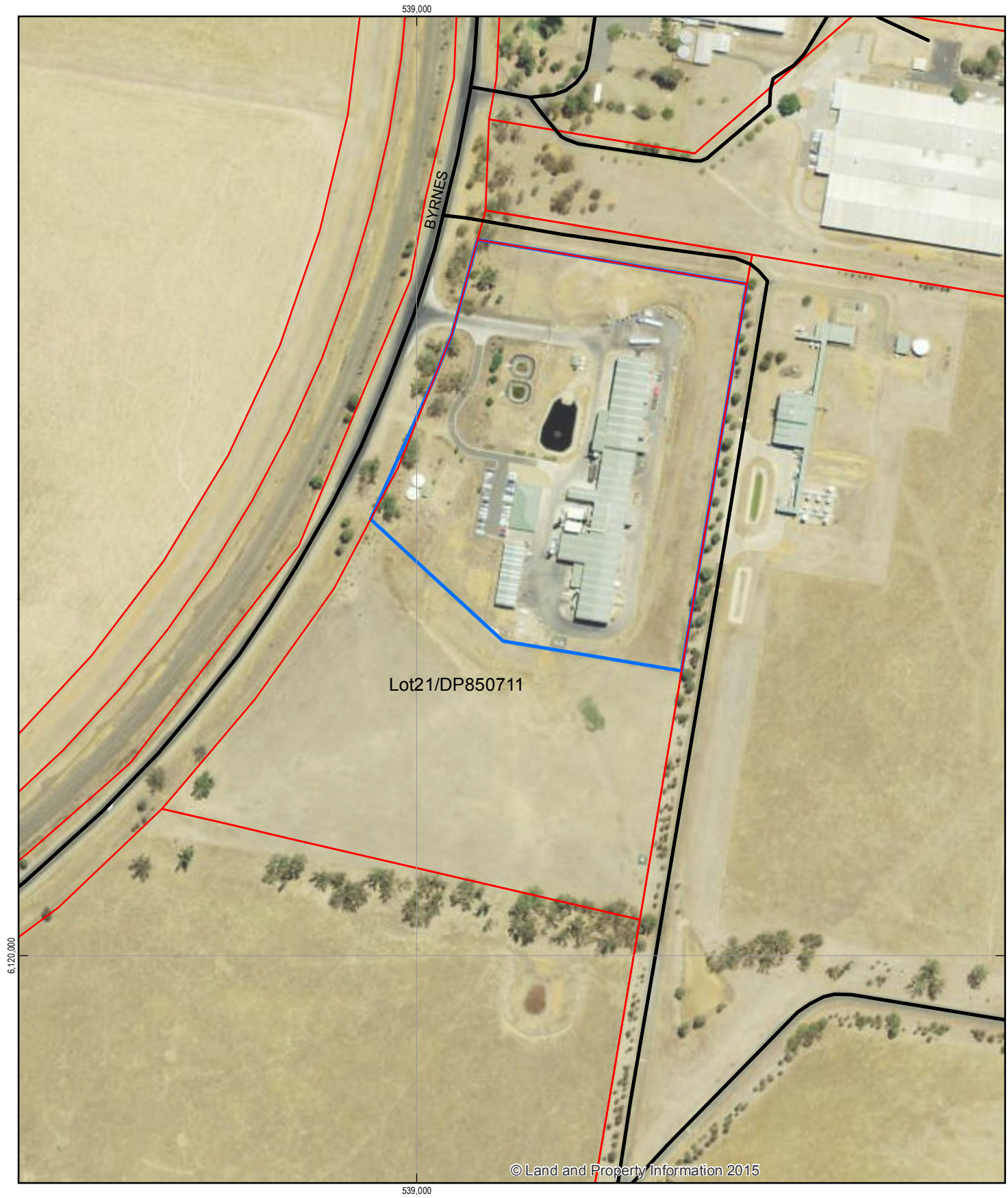
The project has the following key features:

- Increasing production from 70,000 to 120,000 tpa
- A new building to the east of the current facility will contain a new salt storage, crystallisation area, purification and scrubber.
- The existing facility will undergo some upgrades to include two new furnaces, a baghouse, hygiene air baghouse, additional battery breaker, slag bay, oxygen storage and foundry room and more capacity to store the ULAB and raw materials.
- A small increase to capacity of existing car park
- The current office/change house building will be modified to house just a change house and the office employees will be moved to another nearby facility.
- A small deviation to the internal site roads to provide access to the new building.

The Project represents a substantial increase to the approved processing capacity at the site and does not constitute substantially the same development as the existing facility. A new development application (DA) will therefore be required for the Project in accordance with Part 4 of the *Environmental Planning and Assessment Act, 1979* (EP&A Act).

The Project constitutes development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes of waste per year and is defined as State Significant Development (SSD) under Schedule 1, Item 23 of the *State Environmental Planning Policy (State and Regional Development) 2011*. As such, an Environmental Impact Statement (EIS) will need to be prepared to accompany the DA for the Project, for determination by the NSW Minister for Planning or delegate.

This Preliminary Environmental Assessment (PEA) has been prepared to introduce the Project to key stakeholders and enable the Department of Planning and Environment (DPE) to issue the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of the EIS.



LEGEND

- Roads
- Lot Boundaries
- Original Project Boudary

Paper Size A4

0 12.5 25 50 75 100

Metres

Map Projection: Transverse Mercator
Horizontal Datum: GDA 1994
Grid: GDA 1994 MGA Zone 55

N

Renewed Metal Technologies
PEA

Project site location

Job Number	2315946
Revision	A
Date	16 Mar 2017

Figure 1-1

Suite 3, Level 1, 161-169 Baylis Street Wagga Wagga NSW 2650 Australia **T** 61 2 6923 7400 **F** 61 2 6971 9565 **E** wgamail@ghd.com **W** www.ghd.com

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Data source: Data Custodian, Data Set Name/Title, Version/Date. Created by:bjfourie

1.2 The proponent

Renewed Metal Technologies is the proponent.

RMT is Australia's largest recycler of lead acid batteries and is a subsidiary of Enirgi Power Storage.

1.3 Purpose of this report

This document provides the information required to support the proponent's application in accordance with the requirements of Part 4 of the EP&A Act. It describes the Project and the potential environmental issues, to assist in the preparation of the SEARs for the EIS.

The remainder of this document is structured as follows:

- Section 2 – provides a description of the background to the project, including a description of the location, land use, zoning and existing environment. The development history for the existing and proposed facility is also provided as is information regarding any consents and/or investigations, which have been prepared for the existing and proposed facility.
- Section 3 – provides a description of the project's key features as well as a brief description of the construction and operation of the Project.
- Section 4 – provides an overview of the statutory framework and approval pathway for the Project.
- Section 5 – provides a preliminary assessment of the potential environmental issues associated with the construction and operation of the project as determined through a preliminary risk assessment, and outlines the proposed scope for the EIS.
- Section 6 – describes the proposed approach to consultation for the project and the EIS
- Section 7 – provides the conclusion to the document.

The following definitions have been used in this report:

- The 'project site' refers to the area that may be directly impacted by the project, in which construction activities would occur.
- The 'study area' consists of land near to and including the project site. The study area is the wider area surrounding the project site, including land that has the potential to be indirectly impacted by the Project (for example, as a result of any noise impacts).

2. Background to the Project

2.1 Site context

2.1.1 Location

The project is located on Byrnes Road in Bomen, approximately 10 km northeast of the centre of Wagga Wagga. The project site and surrounding industrial properties are located within and near the Bomen Business Park in the City of Wagga Wagga government area (LGA) (Figure 2-1).

The project site is located on lot 21 DP1128492 with only the north part of the lot. The location of the site is shown in Figure 1-1 with total area of the lot being 9.8 ha with the project site encompassing part of the lot with an area of 5 ha.

2.1.2 Land ownership

The project site is owned by Enirgi Power Storage who are the parent company of RMT.

2.1.3 Surrounding land uses

There is a plastic recycling plant located to the east of the project site, which is also owned by RMT. A road that runs along the northern boundary is a road used for access to the plastics recycling plant.

Land use in the surrounding locality is predominantly industrial and is within close proximity to the Bomen Business Park. Industries within the area include:

- BOC gas facility
- Old wool combing facility
- Riverina Oils & Bio Energy (ROBE)
- Vinidex
- Southern Oil Refining.

Land uses directly adjacent to the project site are as follows:

- North –The old wool combing facility is directly adjacent and is being leased out to a range of businesses including manufacturing, truck companies and Visy Industries. There are old ponds further north, which were part of the wool combing facility and are no longer in use. ROBE lies directly north again of the wool combing facility.
- East – RMT lease a factory building to a plastics recycling company that solely recycles plastic from RMT process.
- South – Directly south, a new road associated with the Riverina Intermodal Freight & Logistics (RiFL) Hub is currently being constructed. This road includes establishing an under pass, under Byrnes Road. The BOC gas facility is further south.
- West – The development of the RiFL intermodal hub is currently being constructed to the west. The RiFL hub is extensive and will be developed in a number of stages over a number of years from early 2017.

LEGEND

- Major Roads
- Places

Paper Size A4

0 210 420 840 1,260 1,680

Metres

Map Projection: Transverse Mercator
Horizontal Datum: GDA 1994
Grid: GDA 1994 MGA Zone 55

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Renewed Metal Technologies
PEA

Location

Job Number	2315946
Revision	A
Date	16 Mar 2017

Figure 2-1

Suite 3, Level 1, 161-169 Baylis Street Wagga Wagga NSW 2650 Australia **T** 61 2 6923 7400 **F** 61 2 6971 9565 **E** wgamail@ghd.com **W** www.ghd.com

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The nearest residential properties to the project are located at Rose Hill, approximately 1.2 kilometre (km) to the east of the site.

The nearest large regional urban centre is Wagga Wagga with a population of approximately 63,000. Wagga Wagga constitutes both urban and rural areas however; the majority of the population is located in the urban areas. Key employment sectors in Wagga Wagga include public administration and safety, education, health care, retail trade and, to a lesser extent, manufacturing. Wagga Wagga also includes military areas in Kapooka (Army Recruit Training Centre) and Forest Hill (RAAF Base Wagga). In addition to Bomen the other main industrial area in Wagga Wagga is located in east Wagga Wagga.

2.1.4 Land zoning

Land zoning for the project site and immediate surrounds under the Wagga Wagga Local Environmental Plan 2010 (Wagga LEP) is shown on Figure 2-2. The land zoning for the project site is IN1 General Industrial

2.1.5 Topography

The topography of the surrounding terrain is gently undulating, rising from the Murrumbidgee River at Wagga Wagga, which has an elevation of approximately 175 m Australian Height Datum (AHD).

The project site is generally flat, with a fall of approximately five meters from the south east corner to the north west corner of the site.

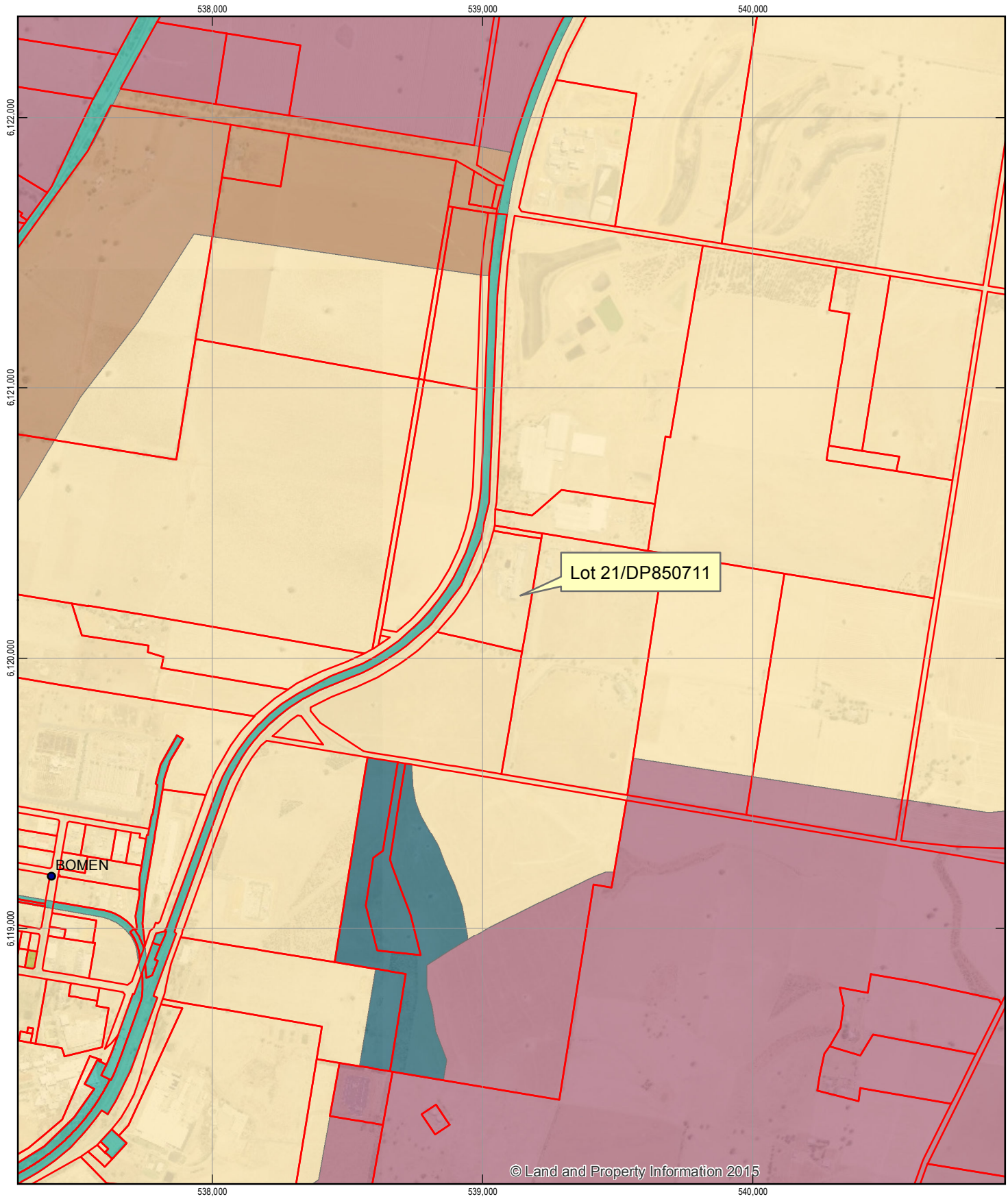
2.1.6 Hydrology

The project site is located within the Murrumbidgee catchment, which has an area of 84,000 km^2. The Murrumbidgee River, located approximately 4 km southwest of the site, generally runs east to west along the northern boundary of urban Wagga Wagga. The Murrumbidgee River spans almost 1.6 km, rising in the Monaro Plains and flowing westward to its junction with the Murray River downstream of Balranald.

Currently the majority of clean stormwater within the project site drains to the stormwater retention ponds located to the west of the project site. Stormwater is combined with rainwater collection and treated recycled water, which is then used for either processing, left to evaporate or irrigated to the south of the project site.

2.1.7 Climate

The climate of the region is temperate, with hot dry summers and cold winters. Mean daily maximum temperatures range from 12.5 degrees Celsius in July to 31.2 degrees Celsius in January. Wagga Wagga (Department of Primary Industries (Science and Research), 2016).



LEGEND

Lot Boundaries

LEP ZONE

IN1 RE1 SP2

IN2 RU1

Paper Size A4

0 70 140 280 420 560

Metres

Map Projection: Transverse Mercator
Horizontal Datum: GDA 1994
Grid: GDA 1994 MGA Zone 55

N

Renewed Metal Technologies

PEA

Wagga Wagga LEP landuse zone

Job Number 2315946
Revision A
Date 16 Mar 2017

Figure 2-2

Suite 3, Level 1, 161-169 Baylis Street Wagga Wagga NSW 2650 Australia **T** 61 2 6923 7400 **F** 61 2 6971 9565 **E** wgamail@ghd.com **W** www.ghd.com

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Data source: Data Custodian, Data Set Name/Title, Version/Date. Created by:bjfourie

2.2 Development history and existing consents

The ULAB recycling facility received approval on a development application submitted 2005 (DA05/0517), with construction commencing in 2007 and commissioning in November 2010. The project was initially approved for processing 42,000 tonnes of ULAB. The facility consisted of a long building where the batteries are crushed separating the lead paste to create soft lead alloy, the plastic cases create polypropylene and the sodium sulphate is used in laundry detergents.

In 2014 RMT submitted a request for SEARs and the proposal was to replica and expand the facility to process 150,000 tpa and extend outside the original EIS boundary of 5 ha (see Figure 2-3). After further consideration of feasibility, the business idea was abandoned and further assessed.

In 2016 RMT submitted a section 96 application to increase processing capacity from 42,000 to 70,000 tonnes which was approved in September 2016.

2.3 Need for the project

The ULAB recycling and processing facility is presently a well-designed facility with modern emission controls. The expansion will enable ULABs to be redirected from an existing older facility in Sydney at Alexandria to now be processed at the facility in Bomen.

The Australian Refined Alloys (ARA) site located at 202-212 Euston Road, Alexandria was established between 1975 to 1980. Due to the age of the site, this battery recycling plant operates old technology, which does not provide the best environmental outcomes for the surrounding area. Redirecting the ULABs from ARA to Bomen would have the following positive outcomes:

- ARA do not use the desulphurisation process like the Bomen facility
- ARA emits more sulphur dioxide and produces more slag waste per tonne of batteries recycled than the Bomen facility
- Treatment of acid at the ARA facility produces a waste to landfill rather than the salt product which is sold from the Bomen facility
- ARA is closer to residential neighbours and
- Removing load of sulphur oxide, nitrogen dioxide and Volatile organic compounds (VOCs) form the Sydney basin.

The Bomen facility operates best practice technology in a purpose built industrial estate with the nearest sensitive receiver over 1 km away.

2.4 Investigation to date

RMT have previously completed an EIS in 2005 for the current facility. This EIS addressed the following key aspects:

- Geology and soil
- Water quality and hydrology
- Flora and fauna
- Air quality
- Waste minimisation and management

- Socio-economics issues
- Noise and vibration
- Aboriginal heritage
- Non-aboriginal heritage
- Visual impacts
- Hazards and risk/hazard analysis.

RMT also have undertaken regular monitoring as per their Environmental Protection Licence and operating conditions. These are mainly around emissions and soil assessments.

LEGEND

- Internal Roads
- Original Project Boudary
- 2017 proposed modification
- Existing buidling
- 2014 Proposed modification
- Lot Boundaries

Paper Size A4

0 5 10 20 30 40

Metres

Map Projection: Transverse Mercator
Horizontal Datum: GDA 1994
Grid: GDA 1994 MGA Zone 55

N

GHD

Renewed Metal Technologies
PEA

Areas of previous and current modification

Job Number 2315946
Revision A
Date 22 Mar 2017

Figure 2-3

Suite 3, Level 1, 161-169 Baylis Street Wagga Wagga NSW 2650 Australia T 61 2 6923 7400 F 61 2 6971 9565 E wgamail@ghd.com W www.ghd.com

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3. The project

3.1 Overview

RMT proposes to expand their current facility, which is currently a building of 5,500m^2 containing the plant to a total area of 8,800 m^2 by establishing a new building and modifying the current building. Within this expansion, the plant which currently has the processing capacity of 70,000 tpa will be increased to 120,000 tpa over time.

The key characteristics that make up the project (construction and operation) are briefly outlined below. Further details of the proposed project will be provided in the EIS.

3.2 Key features of the existing facility

Key feature and descriptions of the existing facility (from north to south) are shown on Figure 3-1 and listed below:

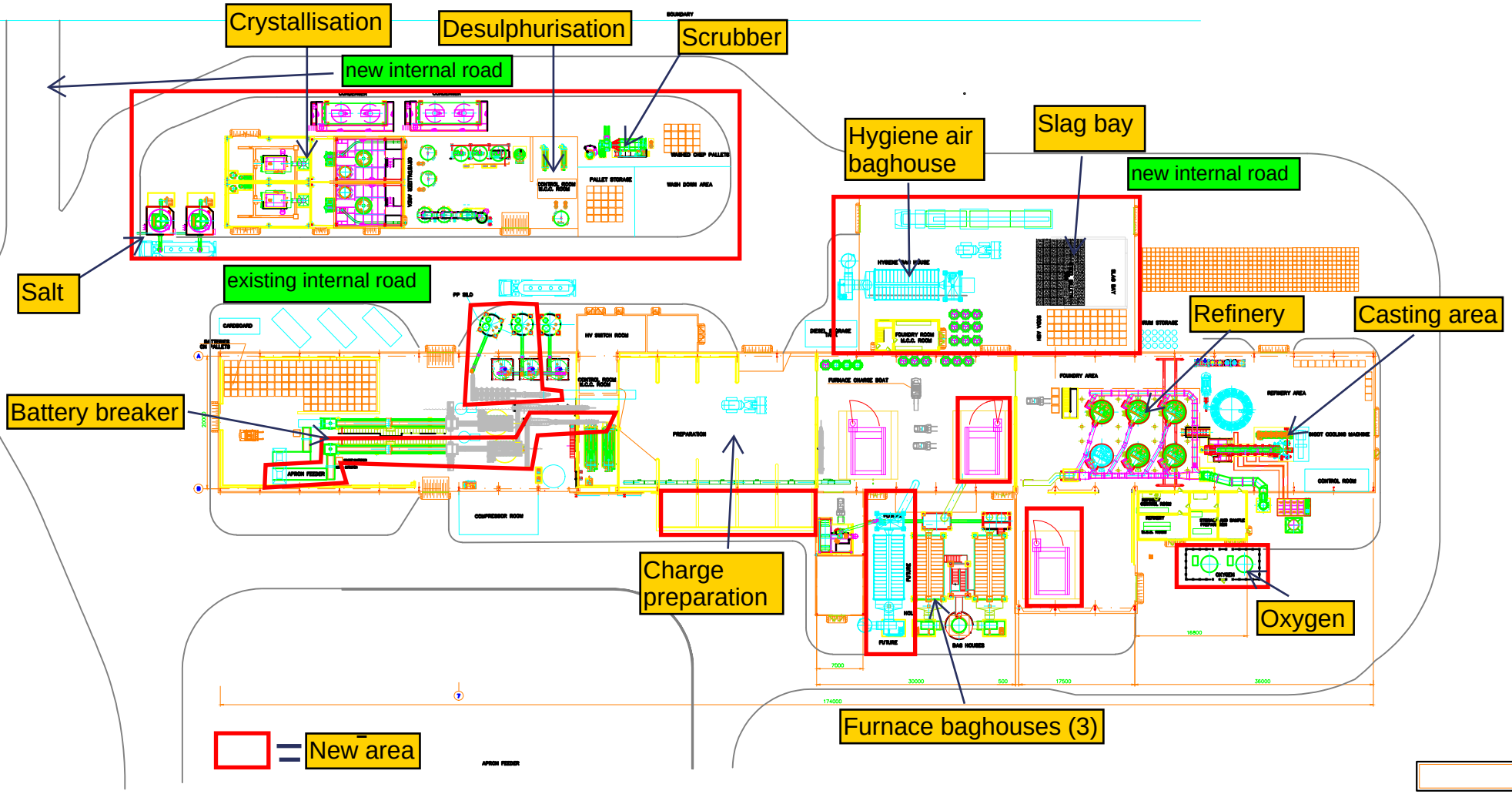
- Battery bunker – Lead acid batteries are unloaded and stored in the batter bunker.
- CX area – The CX area is located after the battery bunker facility and contains the battery feeding system, crushing mill and hydrostatic separation unit.
- Crystallisation area – Currently located on the western side of the main plant building, where crystallised sodium sulphate is produced as a by-product.
- Scrubbing system – This gaseous effluent scrubbing system 'washes' the polluted air from the processes before discharging clean air via an 11 metre stack
- Furnace charge preparation – Where stocks of coal, iron, lead paste, poles/grids and dross are collected and stored.
- Foundry area – The foundry is where is lead is smeltered through a process involving rotary furnaces utilising a gas-oxygen burner. Slag is sent to the slag demolition area.
- Baghouse – The baghouse contains a 20 metre stack where process fumes, dust and total suspended particulates are drawn off into a filter and collected before purified air is release into the atmosphere.
- Refinery area – The refinery area contains a number of kettles where raw lead is refined and cast into lead ingots. Drosses and ashes are removed from the process and collected. Fumes are conveyed back to the baghouse and drosses sent to the charge preparation area.
- Slag Demolition area – The slag, once solidified is broken up to remove lead nodules, which are returned to the process and then loaded on to trucks where it is sent to landfill.

3.3 Key features of the project

Key features of the project are shown on Figure 3-1 and listed below:

- Increasing production from 70,000 to 120,000 tpa
- A new building to the east of the current facility will contain a new salt storage, crystallisation area, purification and scrubber.
- The existing facility will undergo some upgrades to include two new furnaces, a baghouse, hygiene air baghouse, additional battery breaker, slag bay, oxygen storage and foundry room and more capacity to store the raw materials.
- A small increase to capacity of existing car park

- The current office/change house building will be modified to house just a change house and the office employees will be moved to another nearby facility.
- A small deviation to the internal site roads to provide access to the new building.



PLANT NORTH
TRUE NORTH

REFERENCES
Dwg. Nr. P001L000 SITE PLAN
DESCRIPTION

Rev	Date	Description	Drawn	Check
2	16-11-2016	General revision	RS	DN
1	22-10-2016	General revision	RS	DN
0	04-07-2006	Issued	Autocad	GD

Client: Renewed Metal Technologies Pty
Project: PLANT EXPANSION 120000 T/YEAR
Location: 509 BYRNES ROAD BOMEN NSW 2650
Title: GENERAL PLOT PLAN

3.4 Construction of the project

Construction of the Project would involve the following key activities:

- Clearing and levelling of the site for the new building
- Alterations and extension to internal roads
- Set up and removal of any services that are in the area of construction.

Construction is proposed to commence in late 2017/early 2018 and will take approximately 3-5 months to complete.

3.5 Material types and quantities

The site would receive up to 120,000 tpa of ULAB for processing and recycling.

The ULABs are produced into the following types of material with majority of the process creating saleable products and only a small percentage going to landfill.

Material type	% of ULAB recycled and outcome
Lead ingot	71% sold product
Slag	1% waste product disposed
Salt	20% sold product
Polypropylene/Polyethylene	8% sold product

The slag is currently transported to Kemps Creek, which is an approved facility in Sydney. Local councils have been approached, if they would consider setting up an approved facility to reduce transportation costs.

There is also a number of reagents brought onsite and used during for processing such as soda ash, coke, iron and acid.

3.6 Transport and access

Access to the site would be from Byrnes Road. The site entry and exit will not change from the current and existing road. The internal road will be expanded to include access to the new building and expansion areas.

The proposed additional daily traffic movements on Byrnes Road are expected to be minimal and a gradual increase in line with production.

RMT proposes to process up to 120,000 tpa which equates to maximum of 11,600 trucks per year for the delivery of batteries and the removal of products. It is anticipated that there would be a maximum of 32 truck movements per 24 hour period either entering or leaving the site.

RMT aim to maximise back-loading of material to minimise the number of heavy vehicle movements on the local road network. There is also the new development of the Riverina Intermodal Freight Logistics (RiFL) Hub currently being constructed across the road, which is a freight hub to transport goods, by rail. This option will be further investigated once the hub is operational as 60% of RMTs products have the ability to be transported by rail.

3.7 Services

Mains electricity is supplied from Country Energy. The power will be extended to the new buildings from the current facility. There is emergency power generators on site to facilitate a safe and controlled shutdown in the event of a grid power failure.

Water for the operations is supplied by Riverina Water, which equates to around 50 % of the plants water supply requirements. The other 50% is sourced from the collection of the crystalliser condensate.

3.8 Hours of operation

The hours of operation which are current and the same for the expansion is 24 hours a day, 7 days a week.

3.9 Staff number

The project is expected to have the following shifts and number of employees.

Day and night shift

- 12 hour shifts 6am to 6pm and 6pm to 6am
- 16 employee per shift and 4 crews
- Total employees – 64 people

Day shift only

- 12 hour shift 6am to 6pm
- 14 employees and 2 crews
- Total employees – 28 people

Day employees

- Administration – 13 employees
- Maintenance – 2 employees
- Total employee – 15 people

The project will result in an increased workforce from 64 people to over 100 people.

4. Permissibility and Strategic Planning

4.1 Introduction

This section sets out the key planning and environmental regulatory framework applicable to the Project, including the identification of relevant strategic planning documents, environmental planning instruments and key development standards. Both NSW and Commonwealth legislation are identified and will be further considered in the EIS.

4.2 Commonwealth Legislation

4.2.1 Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is the Australian Government's central piece of environmental legislation that provides a legal framework to protect and manage environmental values considered to be of national environmental significance.

The EPBC Act requires approval from the Commonwealth Minister for the Environment for actions that may have a significant impact on listed matters of national environmental significance (MNES).

The Project is considered an "action" which is broadly defined under the EPBC Act to include a project, development, undertaking, activity or series of activities. It is the responsibility of the applicant proposing to undertake an action to initially consider whether the project is likely to have a significant impact on any MNES. If the applicant considers there is potential for significant impacts upon any matters protected under the EPBC Act, then a referral is required to be submitted to the Minister for the Environment. Developments considered likely to result in significant impacts are defined as "controlled actions" and require assessment and approval under the EPBC Act.

An EPBC protected matters search was undertaken on 15 March 2017 and identified the following MNES within one kilometre of the project site:

- Three listed threatened ecological communities.
- 17 listed threatened fauna species.
- Seven listed migratory species.

However, based on the existing condition of the project site and the nature of the works the project is considered unlikely to have a significant impact on any MNES.

Consideration of potential impacts upon listed threatened species and communities and any other MNES potentially impacted by the Project will be undertaken in more detail as part of the EIS. A referral will be submitted to the Minister for the Environment if any unexpected impacts are identified through the EIS assessment process, which potentially constitute a controlled action.

4.3 New South Wales Legislation

4.3.1 Environmental Planning and Assessment Act 1979

Approval Pathway

The Minister for Planning (or his or her delegate, such as the NSW Planning Assessment Commission) determines development applications for State significant development under Part 4 of the EP&A Act.

Under section 89C of the EP&A Act, development will be 'State significant development' if it is declared to be such by the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP). Clause 8(1) of the SRD SEPP provides:

8 Declaration of State significant development: section 89C

(1) Development is declared to be State significant development for the purposes of the Act if:

(a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and

(b) the development is specified in Schedule 1 or 2.

The Project is 'State significant development' under clause 8(1) of the SRD SEPP as it is:

- not permissible without development consent on the land on which the project will be carried out; and
- development that is specified in Schedule 1 to the SRD SEPP.

Application of other provisions of the EP&A Act to the Project

Section 89J of the EP&A Act provides that the following authorisations are not required for projects which have been granted State significant development:

- the concurrence of the Minister administering Part 3 of the *Coastal Protection Act 1979*;
- a permit under sections 201, 205 or 219 of the *Fisheries Management Act 1994*;
- an approval under Part 4, or an excavation permit under section 139, of the *Heritage Act 1977*;
- an Aboriginal heritage impact permit under the *National Parks and Wildlife Act 1974*;
- an authorisation under section 12 of the *Native Vegetation Act 2003*;
- a bush fire safety authority under section 100B of the *Rural Fires Act 1997*; and
- a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the *Water Management Act 2000.*

Section 89K of the EP&A Act provides that the following authorisations cannot be refused if they are necessary for the carrying out of a project which has been granted State significant development consent, and that the authorisations granted must be substantially consistent with the project's State significant development consent:

- an aquaculture permit under section 144 of the *Fisheries Management Act 1994*;
- an approval under section 15 of the *Mine Subsidence Compensation Act 1961*;
- a mining lease under the *Mining Act 1992*;

- a production lease under the *Petroleum (Onshore) Act 1991*;
- an environment protection licence under the *Protection of the Environment Operations Act 1997*;
- a consent under section 138 of the *Roads Act 1993*; and
- a licence under the *Pipelines Act 1967.*

4.3.2 Other NSW legislation

The Project may require approvals under one or more other NSW legislation. This will be considered and addressed in the EIS. A summary of potentially relevant legislation is included in Table 4-1.

Table 4-1: Summary of NSW legislation relevant to the Project

Legislation	Relevance to the Project
Protection of the Environment Operations Act 1997	The *Protection of the Environment Operations Act 1997* (POEO Act) is administered by the Environment Protection Authority (EPA). The POEO Act regulates and requires licensing for environmental protection, including for waste generation and disposal, and for water, air, land and noise pollution. Under the POEO Act, an EPL is required for premises at which a 'scheduled activity' is conducted. Schedule 1 of the POEO Act lists activities that are scheduled activities for the purposes of the Act. An EPL is currently held for the existing Battery Recycling facility (EPL # 12878). The EPL includes a number of requirements for ongoing monitoring and/or reporting associated with air emissions and weather monitoring. A variation would be applied for through the EPA. While the activities which will be undertaken at the project site are unlikely to cause additional significant air emissions constraints, the detailed design and EIS will include mitigation measures to manage potential discharges in accordance with the POEO Act.
Contaminated Land Management Act 1997	The *Contaminated Land Management Act 1997* (CLM Act) enables the Office of Environment and Heritage (OEH) to respond to contamination that is causing a significant risk of harm to human health or the environment, and sets out criteria for determining whether such a risk exists. NSW OEH can request clean-up from the present land occupier. CLM Act requires notification to OEH of a new contamination discovery. There is a potential for contamination to be present at the project site as potentially contaminating activities have been and are being undertaken at the site. However, biennial contamination assessment have been carried out since 2010 and concluded that no contamination has been detected. The results of the contamination assessments will be discussed further in the EIS.
National Parks and Wildlife Act 1974	The *National Parks and Wildlife Act 1974* (NPW Act) is administered by the OEH and provides for the establishment, care, control, and management of National Parks, historic sites, nature reserves, State conservation areas, Aboriginal areas, and State game reserves. The potential for impacts upon Aboriginal cultural heritage will be considered however, the area has been cleared in 2005 from a full previous field survey. The modification will not be outside the area that has been previously cleared.

Heritage Act 1977	The purpose of the *Heritage Act 1977* (Heritage Act) is to protect and conserve non-indigenous cultural heritage, including listed heritage items, sites, and relics. The EIS will assess non-indigenous cultural heritage however as mentioned a full field survey was undertaken in 2005 and the modification will not go outside this area already surveyed.
Threatened Species Conservation Act 1995	The *Threatened Species Conservation Act 1995* (TSC Act) provides for the conservation of threatened species, populations, and ecological communities of animals and plants. The potential for impacts to threatened flora/fauna and ecological communities is considered unlikely given the current condition of the site, previous survey of the project site and that the modification will not remove any flora.
Waste Avoidance and Resource Recovery Act 2001	The *Waste Avoidance and Resource Recovery Act 2001* (WARR Act) aims to ensure that the waste management hierarchy informs waste management, i.e., avoidance, recovery (including reuse, reprocessing, recycling and energy recovery) and finally, disposal. Waste generation from modification of the facility will be minimal. The EIS will further assess potential waste streams likely to be generated during construction and operation of the facility taking into consideration the waste management hierarchy principles and potential waste licensing requirements under the WARR Act.

4.4 Environmental Planning Instruments

4.4.1 Wagga Wagga Local Environmental Plan 2010

The Wagga LEP provides local environmental planning provisions for land in the Wagga LGA in accordance with the standard environmental planning instrument under section 33A of the EP&A Act.

The Project will be located within the IN1 General Industrial land zone under the Wagga LEP and is permitted with consent under Zone IN1 General Industrial.

4.4.2 State Environmental Planning Policy (State and Regional Development)

State Environmental Planning Policy (State and Regional Development) 2011 (State and Regional Development SEPP) identifies development that is considered of state significance.

Development is declared to be state significant if it is not permissible without consent (i.e. it is permissible with consent) and is specified in schedule 1 or 2 of the State and Regional Development SEPP.

Clause 23 of Schedule 1 relates to waste and resource management facilities including:

(3) Development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste.

The Project is State significant development as defined under Clause 23(3) of Schedule 1 because it is development for the purpose of a processing and recycling ULABs that will handle more than 100,000 tonnes per year.

4.4.3 Approval Pathway

The Minister for Planning (or his or her delegate, such as the NSW Planning Assessment Commission) determines development applications for State significant development under Part 4 of the EP&A Act.

Under section 89C of the EP&A Act, development will be 'State significant development' if it is permitted with consent and declared to be such by the State and Regional Development) 2011 (SRD SEPP).

As described in section 4.3.2 the proposed resource recovery facility is permitted with consent under the Wagga Wagga LEP.

The Project is State significant development as defined under Clause 23 of Schedule 1 of the State and Regional Development SEPP because it is development for the purpose of a processing and recycling ULABs that will handle more than 100,000 tonnes per year.

The project is therefore State significant development.

5. Key Environmental Issues

5.1 Identification

The key project-related issues warranting detailed assessment in the EIS will be identified through:

- A review of the existing environmental context and surrounding locality.
- The legislative framework applicable to the Project.
- The preliminary environmental risk screening undertaken as a part of this PEA.
- The outcomes of consultation to be undertaken with government agencies and other relevant stakeholders.
- Specialist studies completed as part of the preparation of the EIS.

The outcomes of the preliminary environmental risk screening, including the issues identified for further detailed assessment in the EIS, are discussed in Table 5-1. These issues will form the basis of the EIS, subject to the outcomes of consultation with government agencies, including the SEARs, as well as outcomes of the specialist assessments as they progress.

5.2 Environmental risk analysis

A preliminary environmental risk screening was undertaken to identify potential environmental impacts that may arise as a result of the Project.

The preliminary environmental risk screening was undertaken in the form of a preliminary, desktop-level risk assessment, to broadly assess the potential environmental risks that may arise as a result of the construction and operation of the facility to identify key areas for the assessment.

The environmental risk analysis for the project involved:

- Identifying environmental aspects
- Identifying the source of potential risks associated with each of these aspects
- Identifying the potential impact associated with each risk
- Identifying priority issues for the EIS.

Potential impacts were assigned a rating of low, moderate or high, based on the level of risk associated with each environmental aspect. High impacts were considered the greatest priority and would be the focus of the detailed design and/or the environmental assessment undertaken as part of the EIS.

Table 5-1 provides the environmental risk analysis for the Project, it includes:

- A summary of the potential key impacts/risks
- Consideration of the priority for the assessment based on the significance of the impact
- A discussion regarding the findings of the preliminary risk screening.

Table 5-1: Preliminary environmental risk screening results

Environmental aspect	Source of risk	Potential impact	Priority of Assessment	Discussion
Traffic and access	Disruption to local road network during operation	Potential disruption to local road users	Moderate	The project is anticipated to result in a minor increase to traffic generation and therefore additional traffic on the local road network. The project will be designed to ensure there is no change to the operational capacity or level of service for key intersections on the local road network The EIS will include a traffic impact assessment which considers the potential impacts of the Project.
Noise	Noise generated during construction	Impact upon any sensitive receivers in proximity to the project	Low	Some noise is expected to be generated during construction of the new building and facilities. Potential impacts are considered to be low as a result of the distance to nearby receivers. The potential for construction noise impacts will be considered in the EIS.
	Operational noise	Disturbance to sensitive receivers from operation	Low	The project includes operation of stationary plant and equipment within closed buildings. The processing operations will be undertaken with the project site and will be designed to ensure compliance with project specific noise criteria. The potential for operational noise to impact on sensitive receivers will be assessed within the EIS.
	Traffic noise	Impact upon any sensitive receivers near the Project site of trucks entering site for unloading and loading.	Moderate	The project would result in additional heavy vehicle traffic along the haulage route to and from the site. The potential for traffic noise to impact upon any sensitive receivers will be assessed within the EIS in accordance with the EPA's Road Noise Policy.
Air Quality	Dust during construction	Impact upon any sensitive receivers in proximity to the Project	Low	The project would require some potentially dust generating activities during construction, but is not anticipated to result in significant dust generation. Dust generated during construction will be considered qualitatively as a part of the EIS

Environmental aspect	Source of risk	Potential impact	Priority of Assessment	Discussion
	Dust and odour during operation	Impact upon any sensitive receivers in proximity to the Project	Moderate	Processing and deliveries are conducted within sealed buildings however the main dust and odour emissions point is from a centralised emission outlet. An assessment of air quality impacts during operation will be included as a part of the EIS
Soil and Water resources	Modification to water resource use from expanded operations	There will be minimal to no changes in the demand for more water and wastewater treatment	Low	The Project may increase water demand for operational use – such processing or produced slightly more wastewater needing to be treated however, this would be minimal. Consideration of water requirements will be addressed in the EIS
	Altered catchment hydraulics from infrastructure installation	Changes to natural run-off conditions in catchment and erosion and sediment laden run-off during construction	Low	Consideration of impacts to catchment hydrology and potential for erosion will be undertaken as part of the water resource investigations for the EIS.
	Potential site contamination	Impacts on the soil from potential site contamination	Low	There has been a baseline contamination survey undertaken in 2009 and there is currently Biennial soil monitoring conducted on site since 2012. RMT have all the required procedures in place to respond to any potential spill or contamination incidents and this will not change dramatically with the expansion.
Biodiversity	Clearing required for expansion or operating area	Clearance of native vegetation, loss of habitat, degradation of landscape Impacts upon threatened species and communities	Low	The site identified for the expansion is already cleared grassland. There will be no removal of trees and no significant influence to biodiversity directly or indirectly. The current operations are located on existing concrete pad.
Aboriginal Heritage	Disturbance required for operation expansion	Impacts upon Aboriginal artefacts or cultural heritage values	Low	The project site has previously had a full field survey for aboriginal heritage in 2005, with no known or listed items of significance being identified. The footprint for the expansion has been retained within the previous assessment areas.
Historic Heritage	Disturbance required for operation expansion	Impacts upon any listed items in the vicinity	Low	The project site has previously had a full field survey for historic heritage, with no listed items being identified.

Environmental aspect	Source of risk	Potential impact	Priority of Assessment	Discussion
Waste	Waste handling and storage impacts	Increase in the generation of solid waste.	Moderate	Waste handling, storage, processing and disposal methods where outlined in the previous EIS. These waste types will not change and the quantities would increase slightly. This would be detailed in the EIS.
Social and economic	Operation of the scheme	Local and regional benefits	Low	The EIS will consider social and economic benefits of the Project in terms of providing long term employment sustainability and value add for the local economy.
Visual amenity	Visibility of the expansion operations	Impacts to the visual amenity of the surrounding area.	Low	The expansion will not be visual to the public as it is placed behind the existing facility and there is no public access behind the existing facility.
Human Health	Employees health	Potential impacts to employees and any off-site impacts	Moderate	RMT have a rigorous health monitoring program in place for all employees. Potential for exposure is monitored on a regular basis and control measure are implemented immediately to manage the potential for exposure. This would not change in the expansion as all existing procedures and measure would be consistent with existing operations.
Hazards and Risks	Identifying hazards and risks	Risk screening to identify potential hazards and risks to the surrounding area	Moderate	A preliminary hazard analysis as defined under Sepp 33 was undertaken in the previous EIS. No identified hazardous incidents were assessed to have a significant impact offsite. The facility has been demonstrated to be 'potentially hazardous', not 'hazardous' as defined by the SEPP 33 guidelines as the assessed risk levels meet DIPNR risk criteria for surrounding landuses. This would be unlikely to change and there is no change to the process onsite just the potential quantities of materials.
Fire and incident management	Fire or major incident	The potential impact from a fire or major spill incident impacting on the surrounding environment	Low	RMT currently have fire protection throughout their current facility which would be replicated into any new area. RMT also have a good understanding of equipment hazard and risk of fire and natural hazards. RMT have documented procedures and incident management plans. Low combustible/non-combustible materials used in construction.

Environmental aspect	Source of risk	Potential impact	Priority of Assessment	Discussion
Greenhouse Gas Emissions	Greenhouse Gas Emissions	Potential impacts of emissions on the surrounding environment	Low	RMT already undertake monitoring of Greenhouse Gas Emissions and have done additional sulphur dioxide investigations onsite. Greenhouse gas emissions will increase with the expansion and will be included in the EIS. Recycling of lead produces significantly less greenhouse gases then virgin lead.

5.3 Priority assessment for the EIS

Based upon the results of the preliminary environmental analysis, the following broad qualitative risk ratings were assigned for each environmental attribute.

- Moderate – Traffic and Transport, Noise, Air quality and Odour, Waste, Human Health and Hazards and Risks.
- Low – Soil and water, Biodiversity, Aboriginal heritage, Historic heritage, social and economic, Visual amenity, Fire and incident management and Greenhouse Gas Emissions.

The detailed scope of these assessments will be considered following the receipt of the SEARs for the project.

An EIS with supporting technical assessments will be prepared, based upon contemporary government guidelines and in accordance with the SEARs issued for the project.

6. Stakeholder Consultation

A stakeholder engagement program will be developed for the project. It will provide a framework to identify and appropriately consult with stakeholders that may be influenced by or have an interest in the Project. Key stakeholders include:

- Community
- Local industry
- Non-government organisations and community bodies
- Government (Federal, State and Local)

A stakeholder consultation log will be maintained as a record of the consultation activities undertaken, and the contents of this log will be summarised in the EIS.

Consultation to be undertaken as part of the Project will include:

- nearby neighbour doorknock with the most directly affected residential receivers.
- general information provision via a community newsletter prior to EIS exhibition.
- a 1800 number and community e-mail address, for community contact and input.
- Face to face meetings with regulatory and industry stakeholders where required or requested.
- documentation of the stakeholder input into the EIS.

7. Conclusion and Project justification

The project is required as the current capacity will be unable to meet future forecast growth with the potential closure of the Alexandria Site in Sydney. The expansion will accommodate amalgamation of these facilities, which has a number of positive benefits such as:

- ARA do not use the desulphurisation process like the Bomen facility
- ARA emits more sulphur dioxide and produces more slag waste per tonne of batteries recycled than the Bomen facility
- Treatment of acid at the ARA facility produces a waste to landfill rather than the salt product which is sold from the Bomen facility
- ARA is closer to residential neighbours and
- Remove load of sulphur oxide, nitrogen dioxide and VOCs from the Sydney basin.

The Bomen facility operates best practice technology in a purpose built industrial estate with the nearest sensitive receiver over 1 km away.

The processing of ULABs has been occurring at the site since 2010 and the expansion will provide economic benefits for the area with more employment, increasing personnel from 64 people to over 100 people.

The project is permissible with consent and is considered state significant development in accordance with Schedule 1 of the SRD SEPP. An EIS will be prepared to accompany the DA for the Project and will consider all potential impacts associated with the construction and operation of the facility.

This PEA has been prepared to provide an overview of the project and enable the DP&E to issue the SEARs for the preparation of the EIS.

8. References

DotEE 2016a. EPBC Act Protected Matters Search Tool – for a 2 kilometre radius around the subject site (searched March 2017). http://www.environment.gov.au/epbc/pmst/index.html

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2315946-5717/https://projects.ghd.com/oc/Canberra/rmtpreliminaryapprov/Delivery/Documents/PEA/Renewed metal technologies - PEA.docx

Document Status

Revision	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
1	B FOURIE	K ROSEN	17/3/2017	C JOUBERT		19/3/2017
2	B FOURIE	K ROSEN		C JOUBERT		22/3/2017

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