

Request for DGRs for State Significant Development

Proposed Expansion of Renewed Metal Technologies Site
509 Byrnes Road, Bomen, Wagga Wagga, NSW



Prepared for NSW Planning & Environment – Major Projects Assessments

July 2014

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1 INTRODUCTION

Renewed Metal Technologies (RMT) is a wholly owned subsidiary of the Enirgi Group Corporation and operates a used lead acid battery (ULAB) recycling plant in Bomen, Wagga Wagga, NSW, Australia.

The Enirgi Metal Group (EMG) proposes to consolidate current battery and also plastics recycling operations to the RMT Bomen site potentially tripling existing production and employment. Capital investment is estimated at \$50 million.

The proposal would meet the capital investment value threshold in Schedule 1 of SRD SEPP and therefore a request is made for Director General requirements to progress this proposal.

1.1 Applicant and Land Ownership

The applicant and landowner is the Enirgi Metal Group (EMG).

1.2 Subject Land and Locality

The subject land involves Lot 21 DP1128492 and Lot 3 DP594679, with frontage to both Byrnes Road and East Bomen Road, as shown below in Figures 1 & 2. The bulk of the expansion will occur on Lot 21.

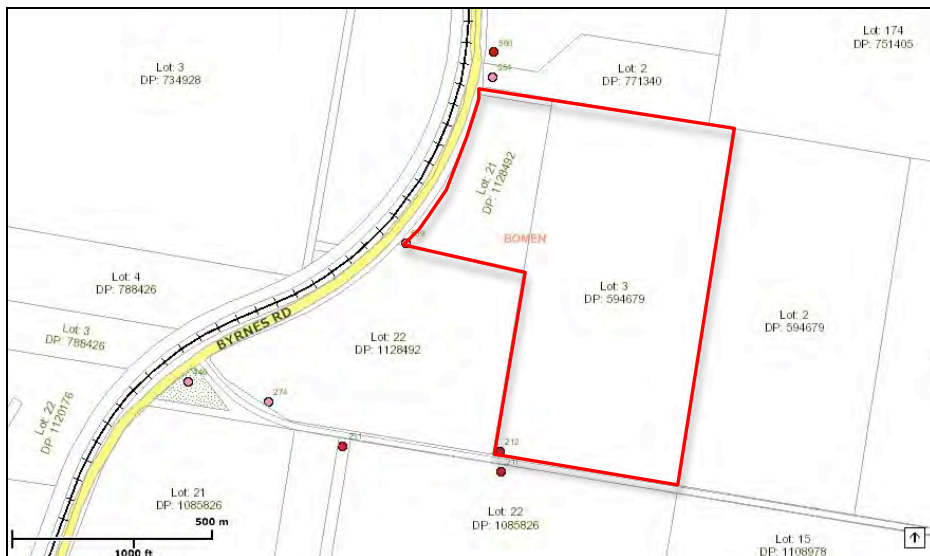


Figure 1: Subject land (Source: WWCC Online Mapping)



Figure 2: Aerial View of subject site (Source: WWCC Online Mapping)

The site is located approximately 10km from the Wagga Wagga CBD on the north of the Bomen Industrial Estate as shown in Figure 3. Regional and National context is shown in Figure 4.

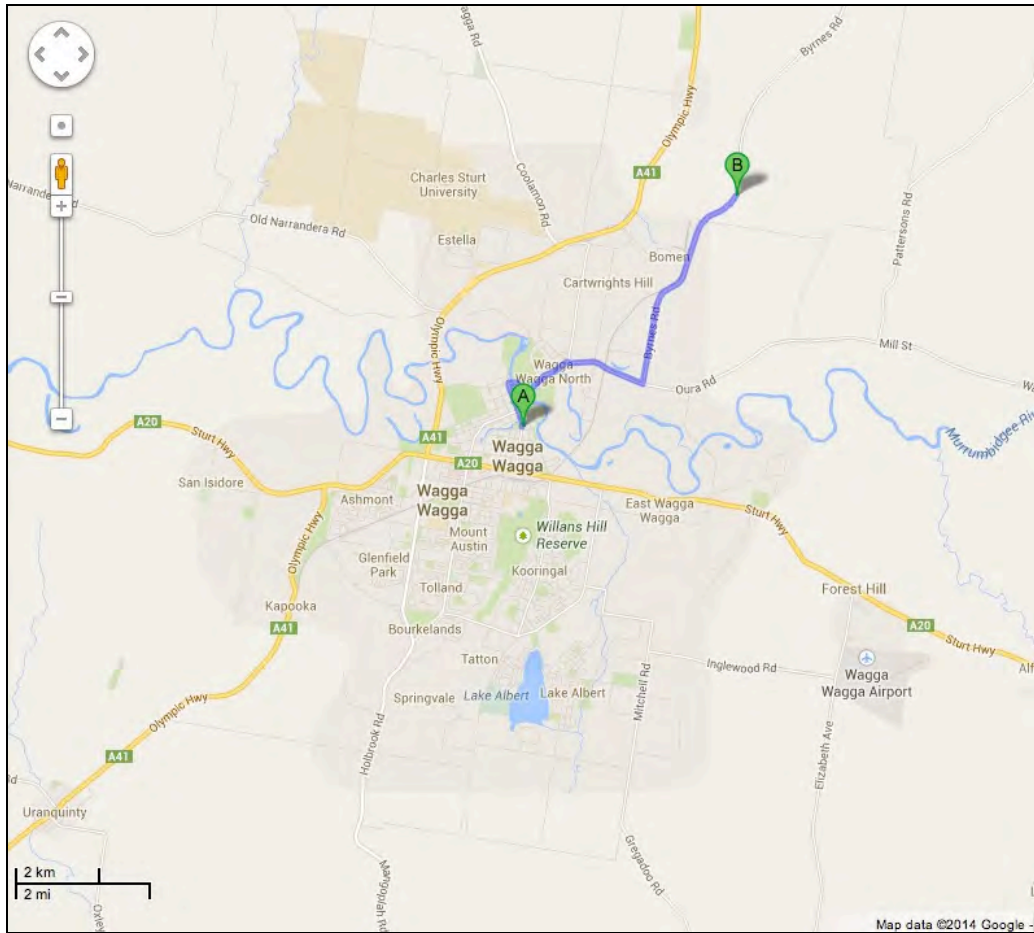


Figure 3: Location of subject land (Source: Google Maps)



Figure 4: Regional & National Context (Source: RMT)

Higher quality aerial and site images are provided as attachments to this submission.

1.3 Surrounding Development

The RMT site is located on the eastern edge of the Bomen Industrial Precinct. A site analysis plan below highlights the adjoining uses and features of the locality.



Figure 5: Surrounding Development



Figure 6: Bomen Intermodal Freight & Logistics Hub – Site Proposal Image

Bomen and surrounding lands have been targeted for industrial expansion since the mid 1990's. Wagga Wagga LEP2010 established industrial zones across most of this land to ensure a land resource for the economic development of the city was secured.

The LEP is supported by other planning documents including the Bomen Masterplan and subsequent strategic and economic development initiatives by Wagga Wagga City Council. The current priority project for Council is the Bomen Intermodal Freight & Logistics Hub to be established opposite the RMT site, see image above. The following weblink provides more information on this project - <http://www.youtube.com/watch?v=aEPSpmqkv9E>.

A extracts from the Bomen Masterplan and current WWCCDCP2010 are provided below, with the RMT site highlighted and placed in context within the growing Bomen industrial precinct.

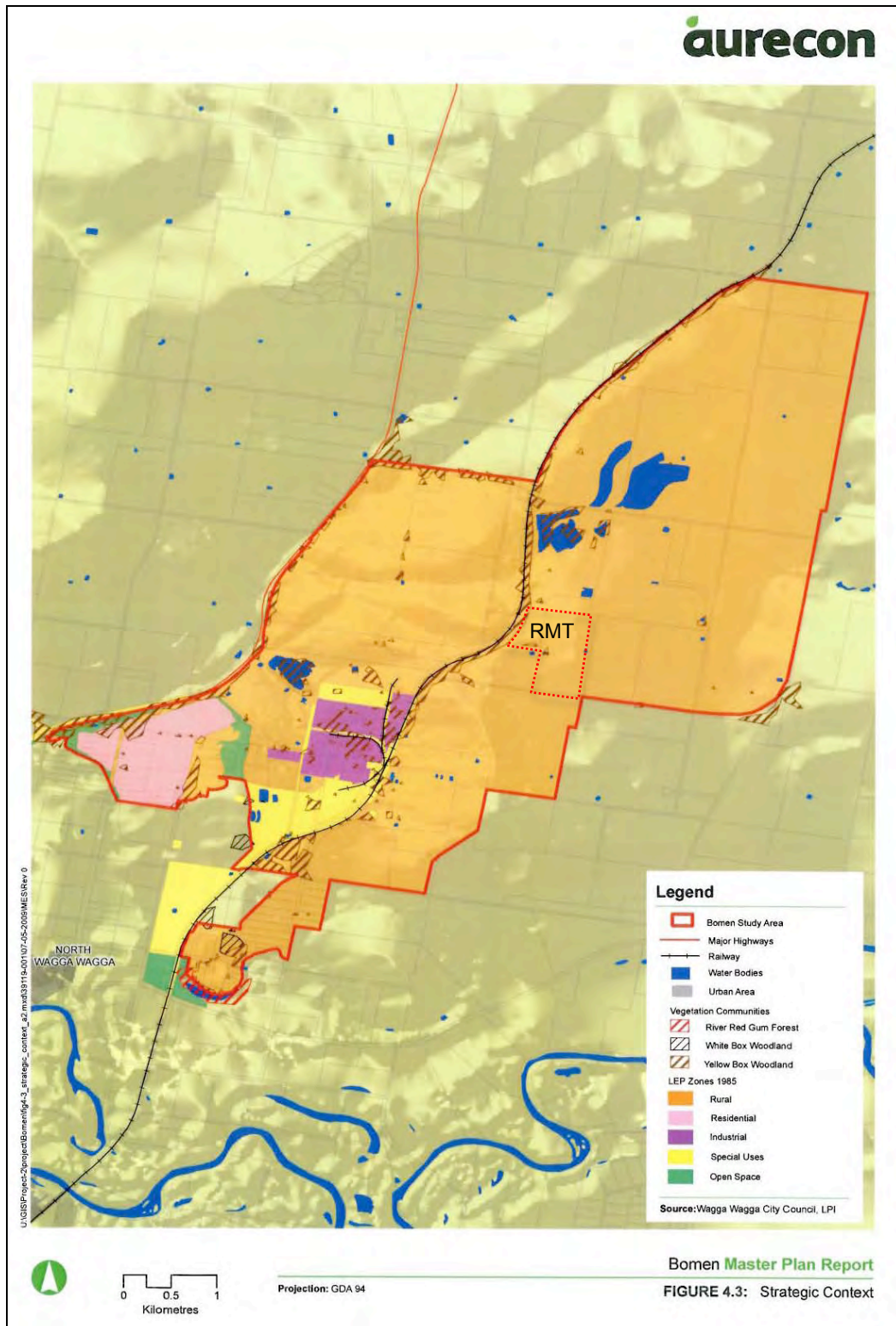


Figure 7: Extract from Bomen Masterplan – Strategic Context

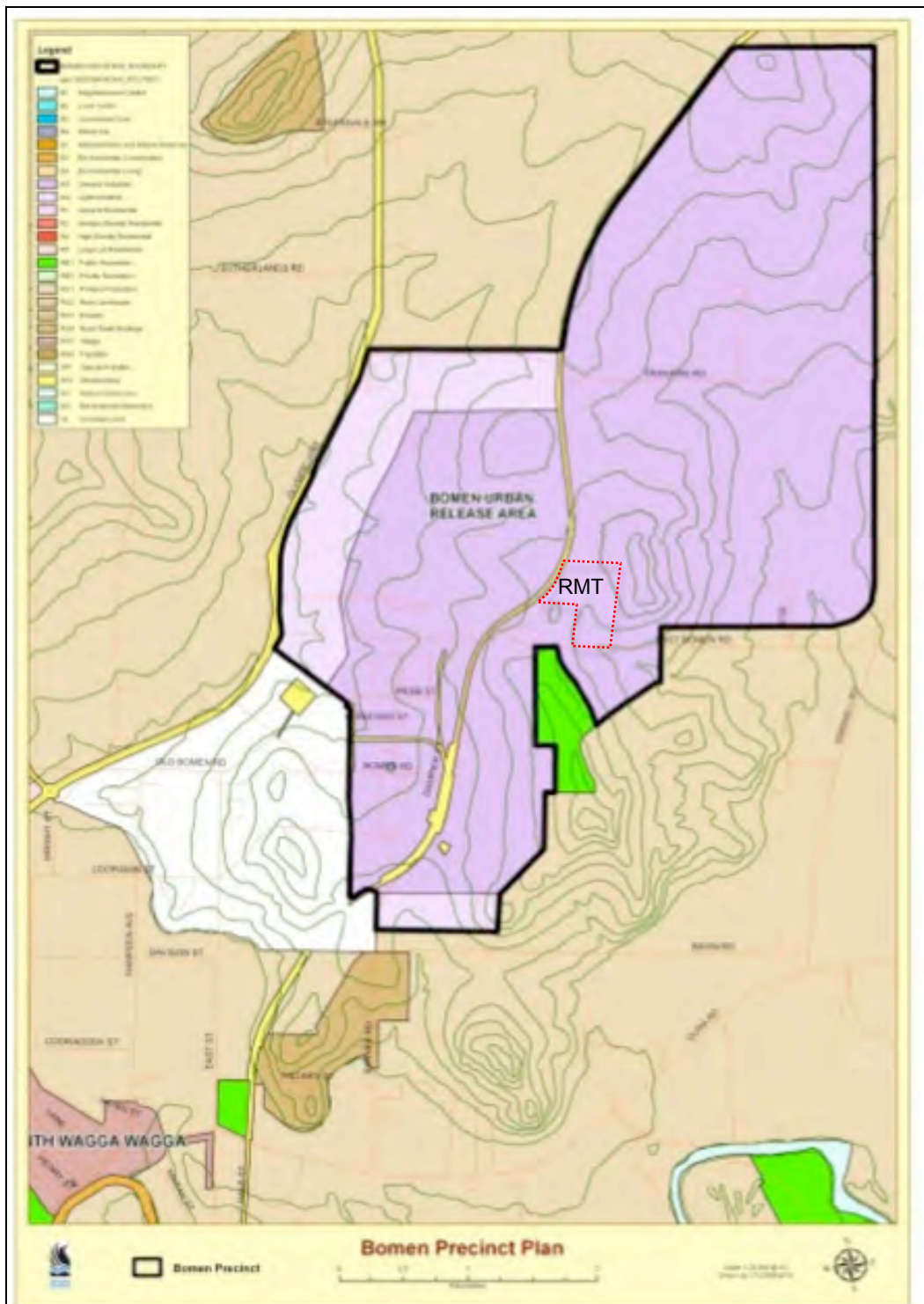


Figure 5 – Bomen Precinct Plan

Figure 8: Extract from WWCCDCP2010 - Bomen Precinct Plan

1.4 Infrastructure & Environmental Features

The RMT site is serviced with essential infrastructure by the following agencies:

- Wagga Wagga City Council (Local Roads, Sewage and Stormwater)
- Essential Energy (Electricity and Gas)
- TransGrid (Electricity)
- Riverina Water County Council (Water)
- Telstra (Communications)
- RMS (National/State Roads)
- ARTC (Rail Access)
- Australian Pipeline Trust (Gas)

There are no major limitations to infrastructure service delivery to this site.

The site slopes generally from northeast to southwest, draining towards the Murrumbidgee River further south. The land is not subject to flood inundation. The land does not have any major limitations in relation to biodiversity, groundwater or general land affectations (see LEP2010 mapping extracts below).

In relation to land vulnerability, the site has been identified as subject to limitations in relation to slope and rock outcrops on the higher land, which is either currently occupied with industrial buildings or not intended to be disturbed as part of this proposed expansion.

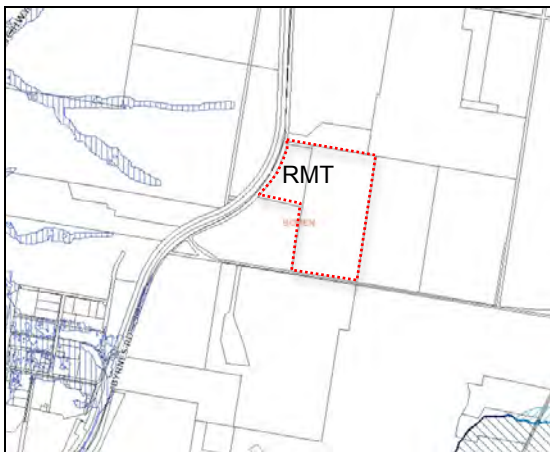


Figure 9: WWCCGIS Flooding layer

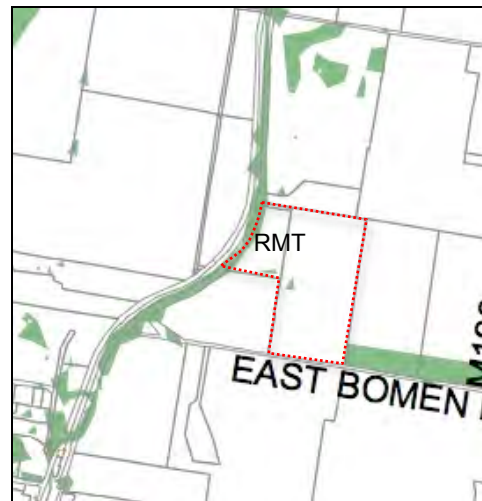


Figure 10: LEP2010 Biodiversity Layer

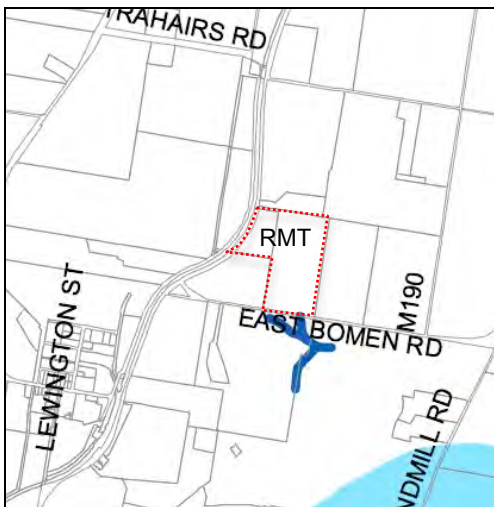


Figure 11: LEP2010 Ground Water Layer

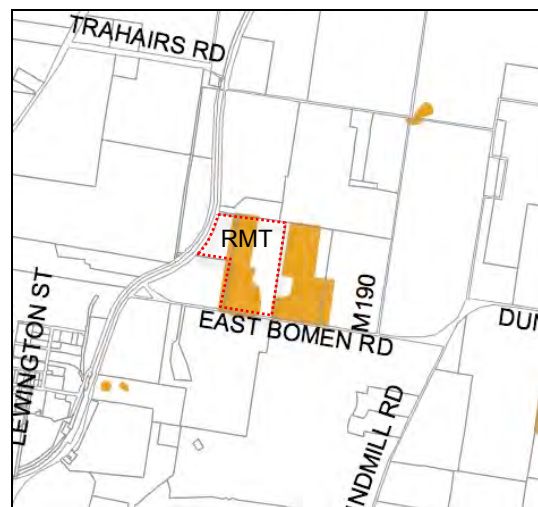


Figure 12: LEP2010 Land Sensitivity Layer

2 ENIRGI METAL GROUP & RMT BACKGROUND

2.1 Enirgi Metal Group

The Enirgi Group Corporation is a diversified industrial business that owns and operates an inventory of world class, long life, competitive resources and assets in the Energy Innovation, Industrial Chemicals and Environmental Solutions sectors. Its operations and offices are located in four countries within the Energy Innovation, Industrial Chemicals and Environmental Solutions sectors (see <http://www.enirgi.com/>).



Figure 13: Enirgi Group Worldwide Operations

Within Australia, the Enirgi Metal Group (EMG) oversees the management and operation of RMT and other member businesses including Australian Refined Alloys Pty Ltd Alexandria, Sydney (ULAB recycling), and Orbitas Pty Ltd, a national ULAB collection business, whose head office is situated in Wagga Wagga. EMG also operates a lead mine in Wiluna, WA, through Rosslyn Hill Mining Pty Ltd, which produces lead carbonate currently exported to China and North America for conversion into lead metal.

2.2 Renewed Metals Technology Plant

Construction of the RMT plant at Bomen commenced in 2007 and was commissioned in November 2010. It currently employs 64 people onsite and a further 20 administrative staff off-site.

The current facility converts used lead acid batteries into lead metal, polypropylene and sodium sulphate. The plant has the capacity to produce either an international standard of soft lead or alloys specifically tailored to its clients' requirements. The lead in ingot form is either exported internationally or sold into the domestic market.

The majority of the lead is reused in the production of new batteries. The high quality sodium sulphate is supplied to customers manufacturing detergents while the polypropylene is recycled domestically.

A detailed RMT fact sheet is provided as an attachment to this submission.

2.3 RMT Development History & Environmental Performance

The current RMT site received development approval via DA05/0517 on 24/4/06 for a Proposed Lead Battery Recycling Facility. The development plans were accompanied by an Environmental Impact Statement, prepared by Kellogg Brown & Root, dated 7/12/05. Subsequent DA modification considerations for the site have included:

- ADA07/0022 approved on 27/8/07 in relation to rewording of certain conditions and inclusion of additional environmental health conditions;
- ADA10/0033 approved on 19/8/10 for a minor rewording of an existing condition;
- ADA10/0077 approved on 10/9/10 for modifications in relation to revised stormwater management onsite;
- ADA11/0075 approved on 19/8/11 for further modifications in relation to revised stormwater management onsite; and
- DA11/0623 approved on 27/2/12 for proposed storage sheds and tanks.

The management and operation of the RMT plant takes a proactive approach to environment management and performance of onsite operational activities. The input and output of materials is closely monitored, with all potential impacts subject to ongoing data capture. In relation to air emissions, the plant employs a Continuous Environmental Monitoring System that provides real time data reported on a monthly basis to EPA. RMT has been subject to a post-commissioning Air Quality Assessment Report, which has been used to benchmark ongoing improvements to the plant operation.

The plant operates under EPA licence 12878, which limits emissions of gases and other substances such as lead from the site. The plant is currently licenced to process 42000 tonnes of used lead acid batteries (ULAB) per annum. Current output is at that limit, subject to the availability of ULAB feedstock.

EPA Licence details relate to the carrying out of "metallurgical activities" and "resource recovery" at the Plant. This is further qualified by the licence to carry out Fee Based Activities, which are "recovery of hazardous and other waste", "non-ferrous metal production (scrap metal)" and "metal waste generation".

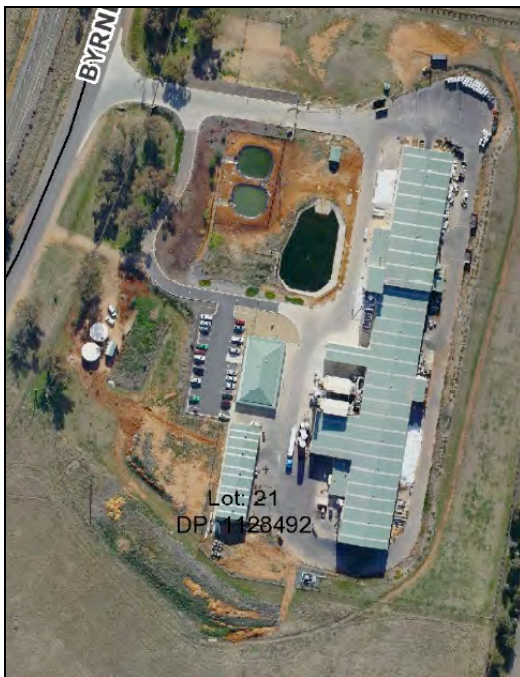


Figure 14: RMT – Existing site

3 DEVELOPMENT PROPOSAL

3.1 General

The proposal is to expand the existing RMT site by consolidating existing operations from the Australian Refined Alloys (ARA) – Alexandria site, and also incorporating plastics recycling from operations in Adelaide, South Australia.

Processing capacity is targeted for 150,000 tonnes of ULAB plus approximately 10,000 tonnes of plastic (polypropylene). Employment will rise from 85 to approximately 140 persons onsite. Capital investment will be approximately \$50,000,000.

EMG has recently acquired the adjoining site (Lot 3 DP594679) formerly occupied by Buckman Laboratories Pty Ltd. The existing building infrastructure will be incorporated into the future operations of RMT, particularly in relation to plastics recycling.

3.2 Battery Recycling

The feedstock to be used in the consolidated RMT operations currently comes from nearly six million junk batteries, which are collected each year by Orbitas. ULABs are collected from every State and Territory across Australia and are then transferred to the EMG secondary lead facilities (RMT). At the facility, the batteries are separated with up to 97% of the original lead in the battery being recovered into saleable lead metal.

An automotive used lead acid battery yields approximately 45-55% lead (hard and soft lead, battery posts, intercell connectors and paste), 5-6% polypropylene (battery case, container lid and vent plugs), and 20% sulphuric acid. The lead, in ingot form, is either exported internationally or transported domestically.

Currently, all feedstock and output is transported by road. There will be opportunity to integrate rail transport to the RMT operation once the proposed Bomen Intermodal Hub project is completed.

3.3 Plastics Recycling

Currently, plastics are recycled in Adelaide, SA. The proposal will involve relocating equipment from Adelaide to Bomen, with production estimated at 10,000 tonnes processing and selling. Incorporating the plastics recycling operation to the Bomen site will create approximately 10 full time positions.

3.4 Building Details & Staging

The proposed development will involve an expansion to the current buildings as shown in the plans below. Higher resolution concept plan set is included as an attachment to this submission.

Site access/egress will be primarily from East Bomen Road (current Buckman's site access) to facilitate more efficient circulation and operation within the site.

Site embellishment will include planting along site boundaries incorporating native trees to screen the site from Byrnes Road and other neighbouring localities to ensure the rural landscape is not overly impacted.

The proposal is expected to be completed as one stage only.

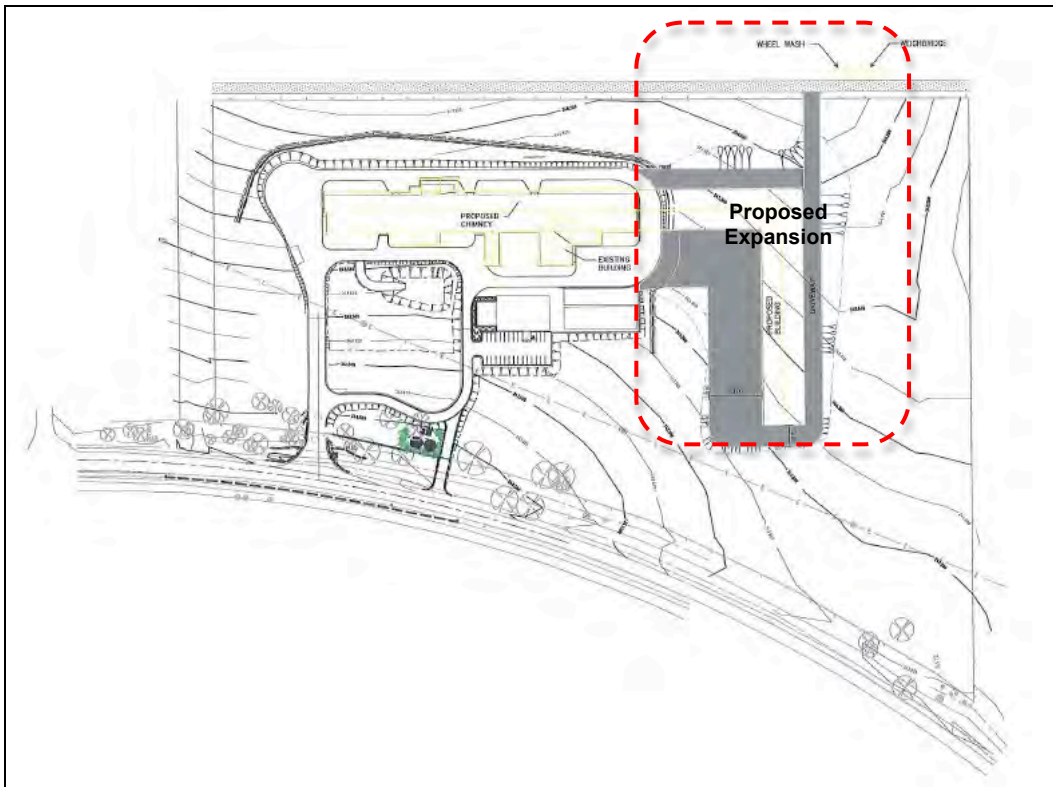


Figure 15: RMT Expansion – concept site plan

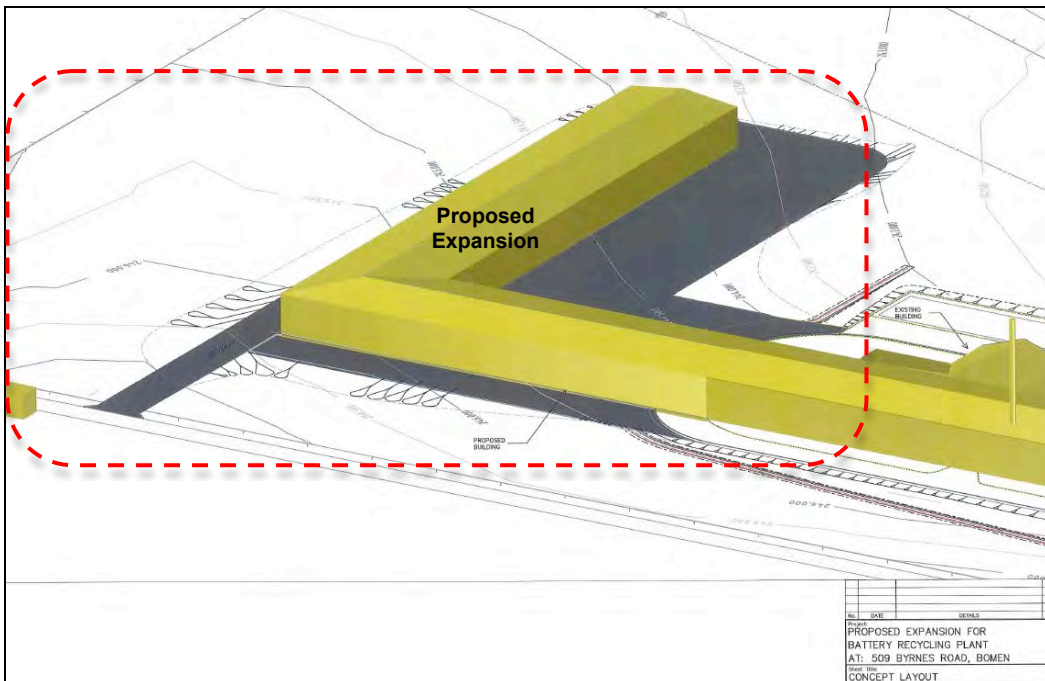


Figure 16: RMT Expansion – 3D Elevation looking SW

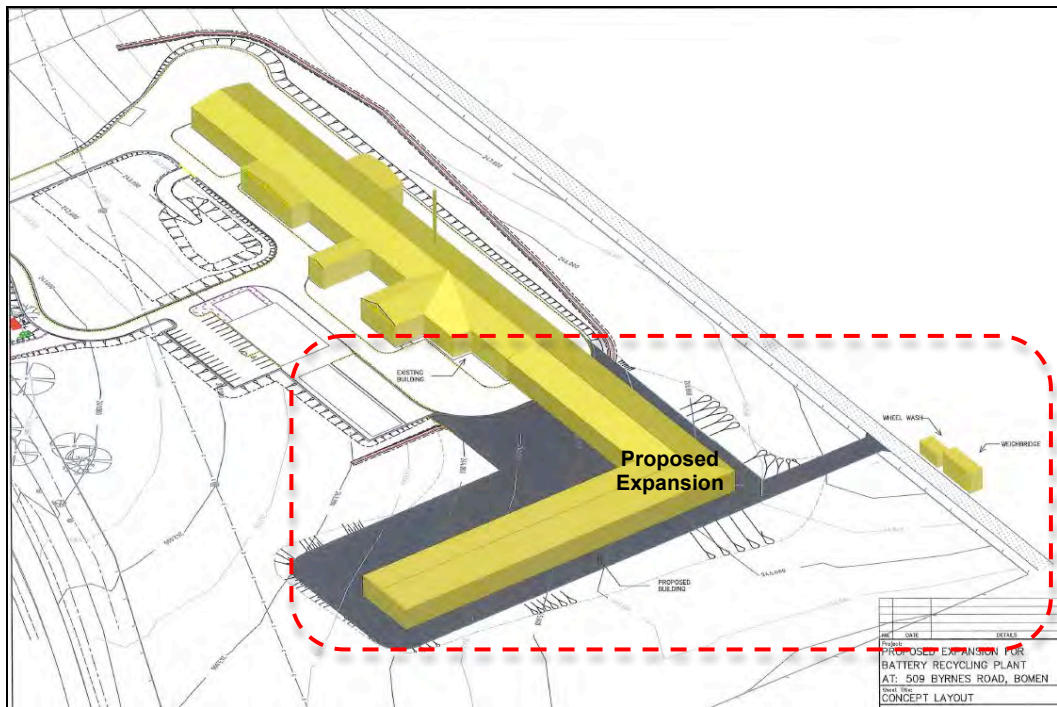


Figure 17: RMT Expansion – 3D Elevation looking NE

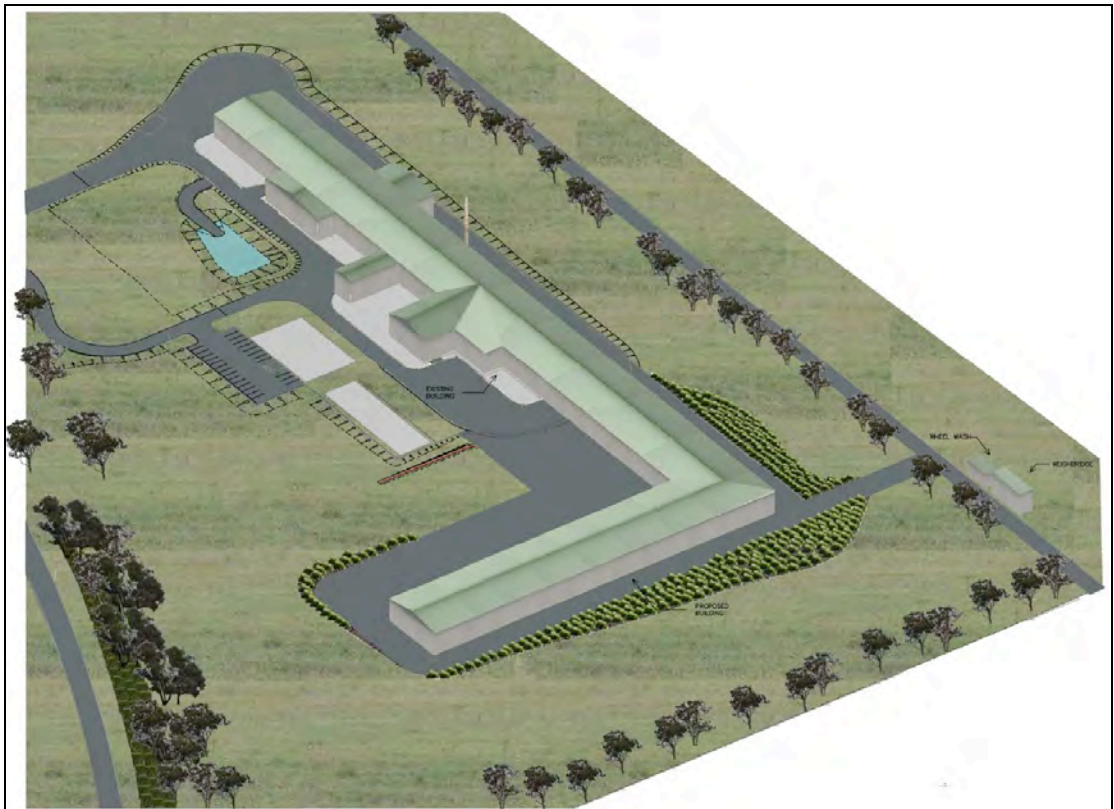


Figure 18: RMT Expansion – 3D Elevation looking NE with landscaping treatment rendered



Figure 19: Photo of existing RMT site – looking NE from Byrnes Road



Figure 20: Photo of existing site with new buildings



Figure 21: Photo with expansion & proposed boundary native plantings

3.5 Permissibility & Strategic Planning

Local Planning Provisions

The land is currently zoned IN1 General Industrial under Wagga Wagga LEP2010. DCP2010 also supports the LEP provisions and includes relevant chapters on development guidelines, development in industrial zones and Bomen Urban Release Area special provision guidelines.

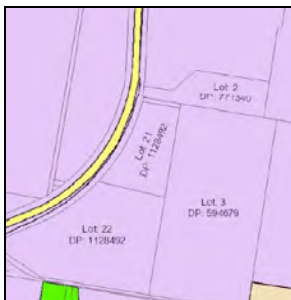


Figure 22: WWCC LEP2010 map extract

The proposed use is an expansion of an existing designated development. The appropriate landuse definition would be "heavy industry" under LEP2010, defined as follows:

"heavy industry" means a building or place used to carry out an industrial activity that requires separation from other development because of the nature of the processes involved, or the materials used, stored or produced, and includes:

- (a) hazardous industry, or
- (b) offensive industry.

It may also involve the use of a hazardous storage establishment or offensive storage establishment.

Note. Heavy industries are a type of industry—see the definition of that term in this Dictionary.

"Heavy industry" is an innominate use under the IN1 landuse guide. It is permitted with consent as "any other development not specified in item 2 (permitted without consent) or 4 (prohibited)."

Designated Development Provisions (EP&A Act 1979 – Schedule 3)

The original plant was assessed as a designated development, being:

9 Chemical industries and works

(1) Chemical industries or works for the commercial production of, or research into, chemical substances, comprising:

- (a) chemical industries or works referred to in subclause (2), or
- (b) chemical industries or works other than those referred to in subclause (2):
 - (i) that manufacture, blend, recover or use substances classified as explosive, poisonous or radioactive in the Australian Dangerous Goods Code, or
 - (ii) that manufacture or use more than 1,000 tonnes per year of substances classified (but other than as explosive, poisonous or radioactive) in the Australian Dangerous Goods Code, or
 - (iii) that crush, grind or mill more than 10,000 tonnes per year of chemical substances, or
- (c) chemical industries or works that are located:
 - (i) within 40 metres of a natural waterbody or wetland, or
 - (ii) in an area of high watertable or highly permeable soil, or
 - (iii) in a drinking water catchment, or
 - (iv) on a floodplain.

(2) The chemical industries or works referred to in subclause (1) (a) are the following:

- (b) battery industries that manufacture or reprocess batteries and use or recover more than 30 tonnes of metal per year,
- (i) plastics industries:
 - (i) that manufacture more than 2,000 tonnes per year of synthetic plastic resins, or
 - (ii) that reprocess more than 5,000 tonnes of plastics per year otherwise than by a simple melting and reforming process,

(3) This clause does not apply to:

- (a) chemical industries or works where dangerous goods within the meaning of the Dangerous Goods Act 1975 are stored in quantities below the licence level set out in the regulations under that Act, or
- (b) development specifically referred to elsewhere in this Schedule.

In respect of Part 2 (clauses 35 & 36), being the test of whether alterations or additions are designated development, it is considered that due to the scale of the proposed expansion the development would be designated development.

State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)

In applying the test under Schedule 1 State significant development—general of SRD SEPP, the proposal potentially falls within multiple definitions including:

9 Metal, mineral and extractive material processing

Development that has a capital investment value of more than \$30 million for any of the following purposes:

- (a) metal or mineral refining or smelting, metal founding, rolling, drawing, extruding, coating, fabricating or manufacturing works or metal or mineral recycling or recovery,
- (b) brickworks, ceramic works, silicon or glassworks or tile manufacture,
- (c) cement works, concrete or bitumen pre-mix industries or related products,
- (d) building or construction materials recycling or recovery.

10 Chemical, manufacturing and related industries

(1) Development that has a capital investment value of more than \$30 million for the purpose of the manufacture or reprocessing of the following (not including labelling or packaging):

- (a) soap, detergent or cleaning agents,
- (b) paints, ink, dyes, adhesives, solvents,
- (c) pesticides or inorganic fertiliser,
- (d) pharmaceuticals or veterinary products,
- (e) ammunition or explosives,
- (f) oils, fuels, gas, petrochemicals or precursors,
- (g) polymers, plastics, rubber or tyres,
- (h) batteries or carbon black.

(2) Development with a capital investment value of more than \$30 million for any of the following purposes:

- (a) liquid fuel depots,
- (b) gas storage facilities,
- (c) chemical storage facilities.

(3) Development for the purpose of the manufacture, storage or use of dangerous goods in such quantities that constitute the development as a major hazard facility within the meaning of Chapter 6B of the Occupational Health and Safety Regulation 2001.

23 Waste and resource management facilities

(1) Development for the purpose of regional putrescible landfills or an extension to a regional putrescible landfill that:

- (a) has a capacity to receive more than 75,000 tonnes per year of putrescible waste, or
- (b) has a capacity to receive more than 650,000 tonnes of putrescible waste over the life of the site, or
- (c) is located in an environmentally sensitive area of State significance.

(2) Development for the purpose of waste or resource transfer stations in metropolitan areas of the Sydney region that handle more than 100,000 tonnes per year of waste.

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

(4) Development for the purpose of waste incineration that handles more than 1,000 tonnes per year of waste.

(5) Development for the purpose of hazardous waste facilities that transfer, store or dispose of solid or liquid waste classified in the Australian Dangerous Goods Code or medical, cytotoxic or quarantine waste that handles more than 1,000 tonnes per year of waste.

(6) Development for the purpose of any other liquid waste depot that treats, stores or disposes of industrial liquid waste and:

- (a) handles more than 10,000 tonnes per year of liquid food or grease trap waste, or
- (b) handles more than 1,000 tonnes per year of other aqueous or non-aqueous liquid industrial waste.

As the proposal has a capital investment value of approximately \$50 million it would be declared to be State significant development for the purposes of the Act.

Strategic Planning

The proposal supports the direction of Council's current strategic plan – Spatial Plan 2014/2043. RMT is included as a key development in the Bomen Business Park. See extracts below:

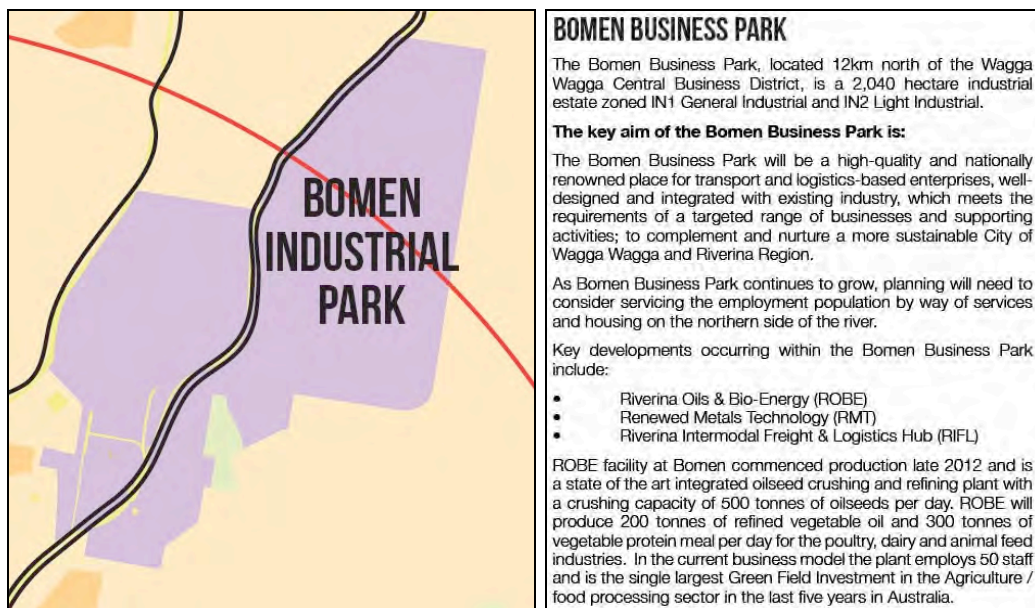


Figure 23: WWCC Spatial Plan 2014-2043 map & text extract

The proposal also supports the direction of the Riverina Regional Action Plan of NSW 2021, particularly in relation to Priority 1 – Support Economic Growth.

PRIORITY 1			
Support economic growth			
Actions	Delivery Lead	Delivery Partners	Timeframe
Support businesses and industries in the region that have a competitive advantage	NSW Trade & Investment	Local councils, Industry Associations and Community Organisations	Ongoing
Finalise and Implement Industry Action Plans	NSW Trade & Investment	Commonwealth Government, local councils, Industry Associations and Community Organisations	Implementation in 2013 over the next 10 years
Regional Industries Investment Fund	NSW Trade & Investment		Ongoing
Primary Industries support	Department of Primary Industries	Industry associations, Universities, National funding bodies	Ongoing
Provide support to small business through the roll out of Small Biz Connect	Small Business Commissioner, NSW Trade & Investment	Local councils, Industry associations	Ongoing
Simplified government transactions	Service NSW		One stop shop centre to open in Wagga Wagga by mid 2013
Promote the region to attract new residents and businesses	Department of Finance and Services		Ongoing
Prepare Regional Growth Plans that incorporate land use and infrastructure	Department of Planning and Infrastructure	Local councils	Ongoing
Provide support to primary industries to improve water efficiency ahead of the Murray Darling Basin Plan implementation	Office of Water – Department of Primary Industries	State Water Corporation, Office of Environment and Heritage, local councils	From 2012 to 2017

Figure 24: NSW 2021 – Riverina Regional Action Plan extract

3.6 Impact Identification & Assessment

The existing plant operation and data collection through various monitoring systems, including EPA documentation, will provide a reliable source of information to measure potential impact of the proposed expansion. The expected environmental impacts requiring assessment would include matters relating to:

- Air quality
- Noise
- Traffic and transport logistics
- Water quality treatment
- Visual impact
- Waste
- Hazards & Risk
- Biodiversity & Landscape
- Social & Economic matters
- Personnel Health & Wellbeing

Existing Environmental Management Plans produced as result of the original DA consent and ongoing operation of the plant will provide a basis for developing expanded version to address the impacts identified.

Current development and environmental data from Council, EPA and other local agencies will be sourced in the preparation of relevant plans and strategies to address impacts. The plant currently utilizes a Continuous Environmental Monitoring System that provides real time data reported on a monthly basis to EPA. RMT has been subject to a post-commissioning Air Quality Assessment Report, which has been used to benchmark ongoing improvements to the plant operation.

Social & economic impacts of the expansion of employment generation and benefits to the local economy are significant positive impacts of the proposal. The local community will be engaged to share information and respond to questions in relation to the proposal. Various strategies to approach this will included local meetings and information circulation via various media outlets, including internet, and counter information at either Council Offices, Library or other CBD shop-fronts.

3.7 Justification

The current RMT plant is operating at its licenced limit. The existing site was chosen because of the current investment in plant & employment infrastructure, proximity to transport nodes and availability of space and resources to expand operation and management of impacts in a sustainable manner. In addition, the opportunity to purchase the adjoining Buckman's site was important in meeting the aims of business consolidation, maximizing efficiency, meeting cost-benefits outcomes, leveraging other existing opportunities, expansion of existing investment in resources and technology, and maintaining good will with the local community.

Several other sites across NSW and Queensland were considered in addition to the existing Wagga Wagga and Alexandria sites. Strategically, Wagga Wagga provides the necessary space, labour force, connectivity and key infrastructure, which are key elements in ensuring the successful future operation of the plant.

3.8 Consultation

At this stage initial consultation has occurred with Wagga Wagga City Council, EPA and several state & federal agencies.

Following the lodgment of this application with NSW Planning, it is understood a planning focus meeting will be arranged with key agencies.

It is also proposed that consultation with be arranged with local community groups (Bomen Action Group, Eunony Action Group) to inform and answer any questions in relation to the planned expansion.

3.9 Capital Investment Value

The proposed Capital Investment Value of the project is \$50,000,000. A quantity surveyors report will be produced as part of the SSD process.

4 CONCLUSION

RMT located at Bomen, Wagga Wagga, is currently operating at its licenced limit of production. In considering expansion plans, opportunity exists to consolidate similar operations from the company's Alexandria plant and also plastics recycling from the Adelaide facility to Wagga Wagga.

The Wagga Wagga site provides all the opportunities to successfully integrate the planned consolidation and expansion in an environmentally and economically sustainable manner.

It is considered the project meets the threshold of state significant development and Director General Requirements are subsequently requested.



The application is submitted to NSW Planning & Environment for registration as State significant development in accordance with Part 4 of the Environmental Planning & Assessment Act 1979.

5 ATTACHMENTS

- A. Concept Plan set
- B. Aerial Plan
- C. Rendered images – Landscaping
- D. RMT Bomen Wagga Wagga Fact Sheet
- E. ARA Alexandria Sydney Fact Sheet

(See separate pdf files)

14002: Document History

Revision	Revision Date	Authorised		
		Name/Position	Signature	Notes
Draft	10/07/2014	Garry Salvestro Director		For discussion
Final	18/07/2014	Garry Salvestro Director		



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