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25 February 2022

David Schwebel
Planning Officer - Industry Assessments
Department of Planning, Industry and Environment
David.schwebel@planning.nsw.gov.au

Dear David,

RE: SSDA 6761 - Arndell Park Clinical Waste Management Facility

Med-X currently operates the clinical waste management facility in NSW:

- **SSDA 6761** and **EPL 20233** - 9 Kenoma Place and 7 Vangeli Street, Arndell Park NSW (Arndell Park facility)

The current COVID situation has resulted in significant impacts to operations at the facility. This letter is to advise the Department of Planning, Industry and Environment (DPIE) that Med-X is seeking temporary interim flexible arrangements for the Arndell Park facilities operating hours **for a period of four months**, after which the COVID related, clinical volumes are expected to decrease.

[Justification for Proposed Activity](#)

The current COVID situation has resulted in the following impacts at the site:

- **Lower density of clinical waste:** Audits of received clinical waste has demonstrated that the average volume of this material has increased due to the additional quantities of bulky, lightweight materials (such as PPE) within the bins. This has significantly decreased the density of the waste arriving at the site resulting in a greater number of clinical waste bins being collected without significant changes to tonnage.
- **Time required for processing activities:** As a result of the increase in the number of bins for treatment, several processing activities require longer operating times than previous operations. These activities include site cleaning, unloading and sorting of full bins, bin washing and loading of clean bins.
- **Changes to safety protocols:** Due to the infectious nature of COVID waste, additional safety procedures have been implemented at the Arndell Park facility (such as additional PPE donning) to reduce infection risk to staff. This has impacted staff shift preparation times.

Site Descriptions

A description of the Arndell Park Facility is summarised in Table 1.

Table 1: Site Descriptions

Site Name	Address	Description of Activities
Arndell Park Facility	9 Kenoma Place, Arndell Park NSW	<ul style="list-style-type: none"> Storage and receipt of clinical and related wastes Treatment of clinical waste
	7 Vangeli Street, Arndell Park NSW	<ul style="list-style-type: none"> Parking Depot Storage of fleet vehicles and clean sharps containers

Waste Quantities

Med-X has recently undertaken a detailed assessment of the clinical waste quantities being processed at the site. This review found that although the number of bins received at the site has increased, the clinical waste tonnage has not been significantly. The current EPL maximum storage and process quantities, summarised in Table 1, have not yet been reached and yearly capacity is still forecasted to be under the maximum limits.

Table 1: Calculated maximum waste quantity for each proposed scenario.

	Units	Existing limits ¹
Maximum weight per autoclave cycle	kg/cycle	648
Maximum no. of cycles / day	cycles/day	13
Maximum autoclave operation time²	Hours	12
Maximum amount of clinical waste stored outside of the approved operating hours.	kg	450kg
The maximum quantity of clinical waste received and treated	tpa	2,000
The maximum quantity of related waste received and stored	tpa	300

¹ Limits as per current EPL

² Assuming average of 55 minutes assumed for each treatment cycle (with a 50-minute run time and 5 minutes for loading and unloading) as per the Response to Submissions and Amended Project Report.



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Waste tracking will continue as per current operations and following the processes detailed in the current Waste Management Plan for Med-X. Key activities include:

- Manually recording the weight, waste type and source (facility where the waste was generated).
- Recording the daily waste volumes processed and stored at the Facility, and collating them on the Med-X Customer Relationship Management (CRM) system for daily monitoring.
- Recording weekly waste volumes, which are stored on the Med-X CRM system and provided to the EPA as per legal and compliance requirements.

Proposed Operating Hours and Activities

As per the current Development Consent (SSD 6761) the Applicant must comply with the hours detailed shown in Figure 1 unless otherwise agreed in writing by the Planning Secretary.

Figure 1: Hours of Operation as shown in the Development Consent (SSDA 6761)

Activity	Day	Time
Operation of Clinical Waste Management Facility at 9 Kenoma Place, Arndell Park	Monday – Saturday (including public holidays that fall on Saturday)	7 am – 7 pm
Operation of depot and storage facility at 7 Vangeli Street, Arndell Park	Monday – Saturday (including public holidays that fall on Saturday)	5 am – 7 pm

To accommodate the additional bins and the additional cleaning activities associated with Covid, it is proposed that operating hours are extended at both **9 Kenoma Place** and **7 Vangeli Street; to 5am to 9:30pm Monday to Sunday**. It is proposed that these changes to operations are for a period of four months.

It is expected that after four months the Covid related clinical waste and other impacts from Covid will decrease and typical operations can resume. The days of operation and typical timeframes for current and proposed activities which will occur at 9 Kenoma Place on are summarised in Table 2.

Table 2: Proposed schedule of site activities

Activities at 9 Kenoma Place	Approximate time of activity	
	Current Operations	Proposed Operations
Staff begin preparatory activities (donning PPE and general maintenance)	6:15am	5:00am
Bin washing	6:15am – 6:30pm	6:15am – 9:00pm
Boiler Turned On ³	6:15am	5:15am
First delivery of clinical waste	7:00am	As per current operations
Compactor Collected	Between 7:00 – 7:30am	As per current operations
Sorting and weighing of waste	7:00am – 7:00pm	7:00am – 9:00pm
Start of first autoclave cycle	7:30am	As per current operations
Empty compactor returned	Between 8:00 – 9:00am	As per current operations
Shredder turned on	8:30am	6:30am
Last delivery of clinical waste	5:00pm	7:00pm
Autoclave turned off	6:30pm	9:00pm
Shredder turned off	7:00pm	9:00pm
Sanitising and cleaning facility ⁴	6:30 – 7:00pm	8:30 – 9:30pm

The Parking Depot (7 Vangeli Street) is to continue to operate as per current arrangements. Under current operations the departure time for 3 MRVs is 5:00am. The remainder of the collection fleet will depart the parking depot between 7:00am-8:00am to start daily collection. All vehicles will return by 7:00pm to the Parking Depot.

Traffic

The total delivery vehicles and arrival times will continue as per current options. As per current operations:

- All vehicles will be managed as per the existing Operational Traffic Management Plan⁵;
- All vehicles arriving to the facility will be monitored using the existing real-time vehicle tracking system; and
- Waste delivery vehicles are to avoid idling in Kenoma Place.

³ As per the Response to Submissions Document (Section 2.4.2), staff preparatory activities, including turning on the boiler, scheduled or emergency basic maintenance and repairs and any office related tasks are excluded from the meaning of ‘operation’. Therefore, these activities can fall outside of the specified operating hours and approval for this activity is not required.

⁴ Sanitising and cleaning the facility are assumed to be excluded from the meaning of “operation”. Therefore, this activity can fall outside of the specified operating hours.

⁵ Refer to Major Projects Website: [Report \(nsw.gov.au\)](http://Report.nsw.gov.au)



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All staff will utilise the staff carparking on site at 9 Kenoma Place. Staff will not park on the surrounding streets.

Air Quality and Odour

Air quality and odour will be managed as per existing operations as detailed in the Operational Environmental Management Plan (OEMP) ⁶ and the Air Quality Management Plan. Key mitigation measures for odour and air quality include keeping building doors closed when not in use, maintaining an odour complaint logbook, vehicles and plant fitted with pollution control devices where required, overnight storage of waste is within sealed containers and the air quality management plan to be updated as required. Med-X has proactively managed air quality and odour control within the facility. An extension to the facilities misting system to provide additional odour control was installed in January. Additionally, ceiling fans are also to be installed in late February. The Odour Audit completed on the 18th of January 2022 concluded that odour was not observed during the field odour survey and there have been no odour related complaints since the SSD approval.

Noise

Based on the proposed operations outlined in Table 2, the primary changes with respect to potential noise emission relate to the earlier operation of the boiler, autoclave and shredder and extended operations of those into the early evening.

While these activities are proposed to encroach further into the evening and night periods (as defined by the EPA *Noise Policy for Industry*), the processes to be extended occur within the building and includes the operation of equipment that produces little noise that is not readily discernible from immediately outside the facility.

The nearest sensitive receivers in proximity to the site are residential dwellings over 400 m to the northeast and are otherwise obstructed by intervening commercial and industrial land use. Given their relationship to the site, and the nature of the extended operations, the proposal is not expected to have a noise impact.

Proposed Stakeholder Engagement

A notification letter will be prepared and delivered to all neighbours on Kenoma Place. The notification letters will be followed up by a phone call. All correspondence whether verbal or written will be tabled in our EPA response forms and communicated to our compliance manager and the EPA.

⁶ Refer to Major Projects Website: [Microsoft Word - Med-X_OEMP_18Dec20.docx \(nsw.gov.au\)](#)



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Complaints Procedure

Customer and public complaints are received via corporate email inboxes. Complaints are continually monitored and measured to identify opportunities for improvement. In the incident of a complaint, DPIE will be notified immediately. All documentation and records of complaints are retained and managed in accordance with the Control of Documented Information procedure and are recorded in a Complaint Log. For additional details refer to Section 4.3.3 of the OEMP.

If you require further information, please don't hesitate to contact me at Timothy.Horton@med-xsolutions.com.au or Deborah Costin – Compliance and Governance Manager on 0423851801 or Debbie.costin@med-xsolutions.com.au

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Timothy Horton', is positioned above the printed name.

Timothy Horton
NSW State Manager
Med-X Healthcare Solutions