



Our Ref: DOC18/243790
Your Ref: SSD 6835 MOD 1

Mr Patrick Copas
Planning Officer - Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

1 May 2018

Dear Mr Copas

I am writing in response to the Department of Planning and Environment (DPE)'s letter requesting any additional comments the NSW Environment Protection Authority (EPA) has in relation to Suez Recycling and Recovery Pty Ltd (the applicant)'s response to the EPA's submissions on the Section 96(1A) modification application by for the development consent relating to the Lucas Heights Resource Recovery Park, Little Forest Road, Lucas Heights ("the premises").

The EPA provides the following advice in relation to the proposal, based on the project information available on DPE's Major projects website at http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9006 and the additional information provided.

No further information required

The updated odour modelling assessment provided provides support for the proposed changes in operational hours and therefore the EPA has no objection to the increase in operational hours proposed by the modification.

However, the EPA notes that the odour assessment does not align to the EPA's practical experience of detecting odour emissions at and beyond the premises, which continue to have an ongoing impact on the local community, as evidenced by ongoing complaints.

The applicant should consider available opportunities to improve the current environmental controls in place for the prevention, minimisation or abatement of odour emission rates from the premises.

These opportunities may include:

- Installation of additional gas wells;
- timing of the installation of landfill gas extraction infrastructure;
- maintenance and monitoring of gas infrastructure (e.g. reduction in delays in capping wells, improved pump and equipment maintenance, flux monitoring);
- identification of landfill surface fissures and depressions in the cover material;
- introducing features that increase the surface roughness of the terrain (such as via vegetation), with a focus near odour emission sources, sensitive receivers, and topographical odour plume pathways, to promote the mixing and dilution of laminar air flows; and
- improved understanding of events that cause odour complaints.

Licensing changes

Should DPE approve the proposed modification, the EPA will propose to vary the Environment Protection Licence No. 5065 to include the new operational hours and provide further clarity to the local community.

Should you wish to discuss the above matters, please contact Laura Ansted on (02) 9995 6812.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'T. Wilson', with a stylized, flowing script.

TREVOR WILSON
Unit Head – Waste Compliance
Environment Protection Authority