



DOC18/
SSD 7075 MOD 3

Mr Kelly McNicol
Team Leader
Department of Planning and Environment
320 Pitt Street
Sydney NSW 2000

STANDARD POST
21 September 2018

Attention: Shaun Williams

Dear Mr McNicol

Modification Application - Erskine Park Resource Management Facility (SSD 7075 MOD 3)

The Department of Planning and Environment has referred the Erskine Park Resource Management Facility (**SSD 7075 MOD 3**) Section 96 (1A) modification application to the EPA for comment. The modification proposes adding a sorting line for separating putrescible waste streams at the Premises.

The EPA has reviewed The Odour Unit (**TOU**) memorandum *Odour Modelling – Sort Line at Erskine Park Transfer Station: Revised Report* dated 27 August 2018 (the **TOU Memorandum**) which was submitted by the proponent in support of SSD 7075 MOD3. The TOU Memorandum undertakes to assess the odour impact that may be caused by the addition of the sort line at the Premises.

The TOU Memorandum makes changes to the assumptions relied upon by both the proponent and the EPA in the initial assessment, and subsequent approval, of the proposed activity (SSD 7075). Two changes include the worst-case odour emission rates and the inline odour control units.

Odour emission rate

TOU disagree with, and have consequently modified, the SLR modelling relied upon in the SLR Air Quality Impact Assessment and Management Report (**AQIM**) that supported SSD 7075. The TOU Memorandum chooses to reduce the odour emissions rate (**OER**) from 503.1 to 113.5 ou.m³/t.s of waste on the floor. The assumed odour emission rate is critical to reasonable assessment of potential impact to adjoining occupancies and residential premises and consequently requires further justification than that provided in the TOU Memorandum.

Odour control units

The TOU Memorandum has modelled odour reduction with the proponent using only one of three odour control units, such that two odour emission stacks will vent from the Premises untreated. The EPA made clear in pre-assessment discussions between the EPA and the proponent that it would

require treatment to all stack emissions in an issued environment protection licence and that this should be included in submissions made by the proponent in support of SSD 7075. The EPA has not been approached by the proponent providing clarification of this change to those previous commitments made. In lieu of further justification, the EPA remains committed to requiring treatment of all odour emissions from the Premises.

Meeting

The EPA is happy to meet with the proponent, representatives of TOU and DP&E to discuss the proposed modification and better understand the proponents' measures to minimise potential odour impact from the Premises.

Recommendation

In lieu of further discussion regarding the issues raised above, the EPA recommends rejecting the proposed modification SSD 7075 MOD3.

Should you have any question regarding this matter, please contact Mr Damien Rose on 9995 5586.

Yours sincerely



TREVOR WILSON
Unit Head Waste Compliance
Environment Protection Authority