



DOC20/63983

Department of Planning, Industry & Environment
GPO Box 39
SYDNEY SOUTH NSW 2001

Attention: Sheelagh Laguna

14 February 2020

Dear Sir/Madam

West Nowra Landfill Expansion – SSD 7187 – Final EPA Comments

I am writing in response to your email to the Environment Protection Authority (EPA) dated 23 January 2020 regarding the proposed West Nowra Landfill Expansion (SSD 7187). Your email included updated air quality assessment information obtained from the applicant.

The EPA has reviewed this updated information and is satisfied that it addresses the issues raised in our letters dated 29 July 2019 and 15 November 2019. As such, the EPA has no objection to the proposal proceeding, providing the attached recommended conditions are incorporated into the final approval (refer Attachment A).

I note that the EPA has previously provided recommended conditions regarding noise.

Further to the attached recommended conditions, the EPA makes the following comments.

Environment Protection Licence

Shoalhaven City Council currently hold Environment Protection Licence No.5877 which covers existing landfilling activities at the premises. If the expansion proposal is approved, Council will need to make a separate application to the EPA to vary the licence to reflect a new premises boundary and authorise construction of the new cell.

The licence currently includes conditions relating to the construction of new landfill cells which state the following:

06.10 – The licensee must obtain approval from the EPA prior to constructing any landfill cells at the premises.

06.11 – The licensee must provide a report to the EPA which details the design, construction, operation and rehabilitation of any new landfill cell. This report must be submitted to the EPA at least six months before the licensee intends to construct the cell, and it must include details on a QA/QC program which can demonstrate that the cell was constructed to meet its design specifications.

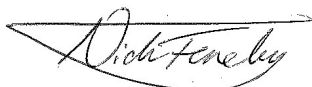
These conditions are standard for landfills and will remain in force on any future licence variations.

Surface and groundwater monitoring

Upgrades to the current monitoring regime at the facility will be required should the development be approved. The EPA will require the licensee to submit an updated surface and groundwater monitoring program including appropriate new monitoring points. The updated monitoring network will need to satisfy the requirements of the EPA's Environmental Guidelines: Solid waste landfills (2016).

If you have any questions about this matter, please contact Greg Frost on (02) 4224 4113.

Yours sincerely

A handwritten signature in black ink, reading "Nick Feneley". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

NICK FENELEY
A/Unit Head Waste Compliance
Environment Protection Authority

Attachment A – Recommended Conditions of Approval

1. The premises must be maintained in a condition which minimises or prevents the emission of air pollutants, including dust, from the premises.
2. All operations and activities occurring at the premises must be carried out in a manner that will prevent and or minimise the emission of air pollutants, including dust, from the premises.
3. The proponent must not cause or permit the emission of offensive odour beyond the boundary of the premises.
4. The active tip face must not exceed 100 m² at any one time
5. The proponent must prepare and implement an Odour Management Plan (OMP) for the premises, that details the odour management strategies implemented. The OMP must include, but is not necessarily limited to the following:
 - a. Objectives and targets, including specific reference to the offensive odour provision under Section 129 of the Protection of the Environment Operations Act and the relevant conditions contained Environment Protection Licence
 - b. Risk assessment
 - c. For all odour emission sources at the site:
 - i. Key performance indicator(s) for controls and management measures
 - ii. Monitoring method(s) including location, frequency and duration
 - iii. Response mechanisms
 - iv. Responsibilities for demonstrating and reporting achievement of key performance indicator(s)
 - v. Record keeping
 - vi. Compliance reporting
 - d. Contingency strategies
 - e. Complaints register. The register must document investigations undertaken to identify the cause(s) of and action(s) taken to rectify any complaints received
 - f. Communications strategy; and
 - g. System and performance review for continuous improvement.