



Our ref. DOC17/0564026
Sender's ref.

Steve Marcon
SUEZ Recycling and Recovery Pty Ltd
Locked Bag 5015
KINGSGROVE NSW 2208

STANDARD POST
15 November 2017

Dear Mr Marcon,

**Licence No 4548 - Wetherill Park Resource Recovery Centre
Proposed modification to development consent SSD 7267**

On 2 November 2017 representatives of SUEZ met with the EPA to discuss proposed changes to the recent development consent issued by the Department of Planning and Environment ("DPE") for the Wetherill Park Resource Recovery Centre ("the Premises").

During the meeting a number of consent conditions were examined for clarification, possible modification or deletion from the development consent. Although some questions were able to be resolved during the meeting, a number of requests by SUEZ required further review of the documents produced as part of the development application process for consent SSD 7267.

Please note that the EPA's comments have not been provided through the planning process with DPE and should SUEZ make a modification application, the EPA's suggested wording in the comments/conditions below is subject to DPE's discretion and may look different if approved.

Condition A8

EPA has been advised that truckloads of waste received at the Premises may be "mixed" putrescible and non-putrescible and therefore difficult to determine the amount of each waste type in incoming loads. Because of this, SUEZ requests to remove the limit of 575m³ or 402.5 tonnes of general solid waste (putrescible) in any 24hr period; or to change the limit to an annual amount.

Upon review of the EIS and response to submissions I note that SUEZ proposed a "maximum daily volume of putrescible waste of 575m³". This was the figure used in the EPA technical assessment of odour impacts from the Premises. I acknowledge that additional "Worst Case Scenario" modelling takes into account 100% putrescible waste in the surge pit and additional stockpiles, however, it should be noted that this scenario will result in 4OU at the nearest industrial receiver. This level of odour is likely to result in problematic odours impacting the surrounding premises. Furthermore, the Worst Case Scenario should not be viewed as the facility's potential processing capacity, but a scenario designed to account for critical failure of transport, machinery or other unplanned events along the waste storage and transport chain.

The EPA specifically foresaw and raised in its comments on the EIS, the potential for problems in maintaining the proposed 61% putrescible and 39% non-putrescible ratio in incoming waste to which

no satisfactory explanation was given. These issues are raised in 1.2 of APPENDIX A – EPA Comments on the Proposal - SSD 7267 submitted to the DPE on 1 June 2016.

The EPA does not support the removal or modification of Condition A8.

Condition B6

SUEZ has raised concerns with the EPA that a meteorological station compliant with the EPA's *Approved Methods for Sampling of Air Pollutants in New South Wales* would be difficult to install at the Premises due to space and height restrictions.

Having immediate access to real-time and historic weather data is important for operators of waste facilities, assisting them to prevent or respond to odour or dust complaints in a timely and informed manner. Because of this the EPA does not support the removal of Condition B6. If approached by DPE to assess an application to modify conditions of consent, the EPA would suggest the following wording: *"Prior to commencement of increased operations, the Applicant must install a meteorological station to the satisfaction of the EPA"*.

Although the requirements for meteorological parameters and placement will be confirmed in any General Terms of Approval issued in response to a modification application of Development Consent SSD 7267, they are likely to include the following:

- Wind Speed,
- Wind Direction, and
- Temperature.
- Data must available in real time and recorded on the hour and half hour.
- Data must be available to any Authorised EPA officer that asks to see it.
- The meteorological station must be placed in an elevated position such as a roof top, at least 10 meters clear of any obstructions.

Condition B9(a)

SUEZ have raised concerns about the wash down of tipping areas citing increased leachate production. Upon review of the Response to Submissions I note that on page 3 a proposal has already been made by SUEZ to undertake a weekly wash down of the floor receiving waste. Furthermore, on page 4 it is noted that the water balance is able to handle daily wash downs.

The EPA stands by the DPE condition requiring weekly wash down of tipping areas contaminated with putrescible waste but is will consider a variation on cleaning of the surge pit. As the surge pit will be used to store waste the need for wash down is not critical. If approached by DPE to assess an application to modify conditions of consent, the EPA would suggest the following wording: *"(a) conduct a weekly wash-down of any tipping area and weekly squeegee scrape of the surge pit where those areas are contaminated with putrescible waste;"*

Condition B9(b)

SUEZ have raised concerns about the wash down of walls citing increased leachate production and the potential for issues with electrical services.

The EPA notes that on page 7 of the Response to Submissions SUEZ on proposal included a yearly wash down and 6 monthly brush down of interior walls would be undertaken. If electrical services are likely to be affected by the wash down then panelling or temporary waterproofing should be installed prior. The EPA does not support the removal of Condition B9(b).

If you have any questions in relation to this matter please contact Josh Madden on (02) 9995 5077 or myself on (02) 9995 5646.



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Environment Protection Authority

Cc: Department of Planning and Environment