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Mr Kelly McNicol - Team Leader  
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**EMAIL & STANDARD POST**  
13 October 2017

Dear Mr McNicol

**Bettergrow Resource Recovery Facility, Wetherill Park, (SSD 7401) - GTAs recommended**

I refer to your letter dated 5 September 2017 seeking the Environment Protection Authority's (EPA's) comment on the Response to Submissions (RTS) report for the State Significant Development Proposal for a resource recovery facility (the Proposal) at 24 David Road, Wetherill Park (the Premises) in the Fairfield Local Government Area.

**Background**

Bettergrow trading as 'Greenspot' (the applicant) proposes to develop and operate the Premises, which would process up to 200,000 tonnes of waste per year, comprising approximately 70,000 tonnes of garden organics/FOGO; 60,000 tonnes of drilling muds and fluids; 40,000 tonnes of bulk landscape material; and 30,000 tonnes of commercial and industrial organic materials. Proposed end products would be transferred either to end use markets or to other facilities for value-adding to maximise beneficial re-use. Processing is limited to separation of materials.

**EPA recommended GTAs for proposal**

EPA has reviewed the information provided and has determined that it is able to issue general terms of approval for the proposal, subject to conditions. The applicant will also need to make a separate application to EPA to apply for an environment protection licence to operate.

The general terms of approval for this proposal are provided at attachment A. If the Department of Planning and Environment (DPE) grants development consent for this proposal these conditions should be incorporated into the consent. If consent is granted for the proposal an environment protection licence will also be required to be held prior to the activity commencing.

These general terms relate to the development as proposed in the documents and information currently provided to EPA. In the event that the development is modified either by the applicant prior to the granting of consent or as a result of the conditions proposed to be attached to the consent, it will be necessary to consult with EPA about the changes before the consent is issued. This will enable EPA to determine whether its general terms need to be modified in light of the changes.

The proposal should be built consistent with the infrastructure, processes and controls detailed in the documents submitted as part of the State Significant Development SSD 7401 application.

## General

The Proponent should be aware that any commitments made in the Environmental Assessment and supporting documents may be formalised as approval conditions and may also be placed as formal licence conditions. Consequently, pollution control measures should not be proposed if they are impractical, unrealistic or beyond the financial viability of the development.

Based upon the information provided to the EPA, should approval be granted, the Proponent may need to make a separate licence application to the EPA. The Proponent should be made aware that a licence issued by the EPA will include conditions regarding:

- provision of a financial assurance for the site consistent with provisions under Part 9.4 of the *Protection of the Environment Operations Act 1997* ("the POEO Act"). The amount and form of the assurance would be determined by the EPA.
- the preparation, testing and implementation a Pollution Incident Response Management Plan in accordance with Section 153A of the POEO Act.
- Authorised amounts which limits the total amount of processed and unprocessed waste materials that can be lawfully stored onsite.

Yours sincerely



**TREVOR WILSON**  
**Unit Head – Sydney Waste Compliance**  
**Environment Protection Authority**

## **Attachment A**

### **Post commissioning Odour Assessment**

Within 6 months of the facility commencing operations, an investigation of odour impacts from the proposal must be undertaken to determine if the operations are satisfactorily managing odour impacts from the site. The investigation must include:

- 1 a) an odour impact assessment of the facility in full operation and an odour mitigation report.
- b) The odour impact assessment study and odour mitigation report must be carried out strictly in accordance with the methodologies set out in the following documents:
  - i) NSW DEC, August 2005, Approved Methods for the Modelling and Assessment of Air Pollutants in NSW.  
<http://www.environment.nsw.gov.au/resources/ammodelling05361.pdf>
  - ii) NSW DEC, December 2006, Approved Methods for the Sampling and Analysis of Air Pollutants in NSW.  
<http://www.environment.nsw.gov.au/resources/amsampling05360.pdf>
  - iii) NSW DEC, 2006, Technical Framework: Assessment and Management of Odour from Stationary Sources in NSW, November 2006.  
<http://www.environment.nsw.gov.au/resources/20060440framework.pdf>
  - iv) NSW DEC, 2006, Technical Notes, Draft Policy: Assessment and Management of Odour from Stationary Sources in NSW, November 2006.  
<http://www.environment.nsw.gov.au/resources/20060441notes.pdf>
- c) The odour impact assessment must address the following:
  - i) An odour audit must be carried out to identify all significant sources of odour at the facility. As part of the odour audit, all significant odour sources that have been identified must be sampled for odour and their emissions concentrations/rates determined strictly in accordance with the methods detailed in 1(b);
  - ii) A dispersion modelling study must be undertaken to predict ground-level concentrations of odour. This must be conducted strictly in accordance with the methods detailed in 1 (b) and using the data collected in 1 (c)(i); and
  - iv) The results of the odour impact assessment must be compared against the appropriate odour performance criterion detailed in 1 (b).
- d) The odour mitigation report must address the following:
  - i) Using the results of the odour impact assessment, if the facility cannot meet the appropriate odour performance criterion in 1 (b), a technical review of all practicable odour mitigation options must be carried out and the potential reduction in odour impacts associated with each odour mitigation option must be quantitatively evaluated;
  - ii) A cost/benefit analysis of a range of odour mitigation options must be carried out; and,
  - iii) Using the results of 1 (c), emission concentration limits (point sources only) and management practices (point and diffuse sources) must be identified for the most cost-effective odour mitigation option to ensure the appropriate odour performance criterion detailed in 1 (b) can be met.
  - iv) The report must present a timeframe for implementing any mitigation works proposed to address odour issues identified in the odour impact assessment.
- e) Within 6 months of the facility commencing operations a formal report on the findings of the odour impact assessment and the odour mitigation report must be submitted to the EPA for consideration.