

Our Reference: DOC17/467235

Mr Kelly McNicol
Team Leader, Industry Assessments
Department of Planning and Environment
Via email: information@planning.nsw.gov.au

Attention: Ms Emma Barnet

13 September 2017

Dear Mr McNicol

**Bulk Recovery Solutions Pty Ltd - Ingleburn Facility - SSD 8593
EPA SEARs**

I refer to the correspondence from Ms Emma Barnet to the Environment Protection Authority (EPA) dated 12 September 2017 regarding the proposed Bulk Recovery Solutions Pty Ltd (BRS) Ingleburn Expansion (the Proposal) and the request for the EPA's Secretary's Environmental Assessment Requirements (SEARs). This follows a Planning Focus Meeting and Site Visit undertaken the same day.

The EPA has considered the details of the Proposal as provided by BRS and its consultant, KDC Pty Ltd, and has identified the information it requires to be assessed in the Environmental Impact Statement as provided at Attachment A. As discussed, the EPA is open to the concept of having problem wastes being dealt with at the site of the Proposal so long as it is done lawfully and properly. In summary, the EPA's key information requirements for the Proposal include an adequate assessment of:

1. Baseline conditions that exist at the site of the Proposal, noting that the subject site is zoned General Industrial under the Campbelltown LEP and is an existing land use;
2. The actual tonnage of waste that can be received, stored, processed and then removed from the site of the Proposal given the proposed 500,000 tonnes seems excessive;
3. The specific treatment processes for each waste stream with corresponding process flow diagrams;
4. Potential environmental impacts arising from the Proposal and its ongoing operations including noise, air, water, land and waste issues; and
5. The management and mitigation measures that will be implemented to protect human and environmental health from these impacts.

In carrying out the environmental assessment, BRS should refer to the relevant guidelines as listed at Attachment B and any relevant industry codes of practice and best available practice management guidelines.

BRS should be made aware that any commitments made in the environmental assessment may be formalised as conditions of approval and therefore potential environment protection licence conditions, noting that the site of the Proposal is already subject to environment protection licence 20797.

The Proponent should also be made aware that, consistent with provisions under Part 9.4 of the *Protection of the Environment Operations Act 1997* (the POEO Act) the EPA may require the provision of a Financial Assurance. The amount and form of the Financial Assurance would be determined by the EPA and be required as a condition of the licence.

As discussed during the site visit, BRS must also be aware of the Resource Recovery Framework and the need to comply with any relevant Resource Recovery Orders for any outgoing materials and where such materials do not meet a general Resource Recovery Order, a specific Resource Recovery Order and Exemption must be applied for.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'Matthew Corradin'.

MATTHEW CORRADIN
Unit Head Waste Compliance
Environment Protection Authority

ATTACHMENT A: EPA SEARs FOR

Bulk Recovery Solutions Pty Ltd - Ingleburn Facility - SSD 8593

How to use these requirements

The EPA requirements have been structured in accordance with relevant guidelines, as follows. It is suggested that the EIS follow the same structure:

- A. Executive summary
- B. The proposal
- C. The location
- D. List of required approvals and licences
- E. Identification and prioritisation of all issues
- F. The environmental issues
- G. The mitigation measures
- H. Justification for the proposal and conclusion

A Executive summary

The document's executive summary should include a discussion of the proposed development, the key environmental risks, the identified mitigation measures, and an overall conclusion for the proposal.

B The proposal

The proposed development must be adequately described and should clearly state and refer to:

- a) the type, the nature and size of the proposed development. This must include a detailed assessment of the actual tonnage of waste that can be received, stored, processed and then removed from the site of the Proposal and include traffic limitations, site limitations, and any industry limitations etc;
- b) the type, the nature and amount of the wastes, the processes and the products to be used. This must include a detailed assessment of each waste streams treatment process from receipt, to storage, to processing, to removal offsite. This must also be accompanied by process flow diagrams for each waste stream including quality assurance and control points, monitoring points, rejection points etc;
- c) the by-products produced and/or wastes produced (including the fate of such products);
- d) the staging and timing of the proposal, including any construction works and any plans for potential future expansion plans etc;
- e) the anticipated benefits to relevant industry, community, etc; and
- f) the proposal's relationship to any other facility or industry.

C The location

Provide an overview of the setting in which the proposed development is to take place in its local and regional environmental context including:

- a) meteorological data (e.g. temperature, wind (prevailing wind direction and strength), rainfall, evaporation, etc)
- b) topography;
- c) surrounding land uses;
- d) surrounding or nearby sensitive receivers;
- e) ecological information (vegetation, fauna, waters); and
- f) availability of services and the accessibility of the site for passenger and freight transport.

D List of approvals and licences

Identify all approvals, licences or permits required to undertake the proposed development as well as those already obtained and those to be obtained.

E Identification and prioritisation of issues / scoping of impact assessment

Identify a scoping risk assessment methodology, undertake a risk assessment, and identify and prioritise key issues.

F The environmental issues

1. Noise

- Identify the existing noise environment and identify applicable noise goals in line with relevant guidance/standards; and
- Identify potential noise and vibration impacts during both construction and operational stages and identify mitigation strategies to be incorporated for both stages to minimise noise and vibration emissions/impacts.

2. Air

- Identify the existing air quality environment and identify applicable air quality goals in line with relevant guidance/standards; and
- Identify potential air quality and odour impacts (including point source emissions from any site based plant and equipment and/or fugitive dust or other emissions) during both construction and operational stages and identify mitigation strategies to minimise point and/or fugitive and/or odour emissions/impacts.

3. Water

- Identify nearby water resources and any expected discharges; and
- Identify potential impacts to surface and groundwater during both construction and operational stages and identify appropriate pollution control systems/measures to protect surface and groundwater resources, particularly erosion and sediment controls during the construction stage and the rehabilitation stage and the inclusion of permanent erosion and sediment controls where required and applicable.

4. Land

- Identify if the soils in the area of the Proposal are contaminated or are acid forming (i.e. acid sulphate soils) and if so, identify any mitigation strategies or remedial and/or disposal actions that will be required/undertaken if applicable.

5. Waste

- Identify options and strategies for waste minimisation; reuse and recycling across all activities and processes during both construction and operational stages and appropriate avoidance, recycling, reuse and disposal options.
- Any options or strategies must be in line with current NSW Government legislation/policy/guidance on waste minimisation etc.

6. Flooding

- Proposed developments should be designed and undertaken in accordance with the State Government's Flood Policy as outlined in the Floodplain Development Manual.

7. Storage and use of fuels / chemicals etc

- Identify adequate storage, control and usage requirements for any fuels/chemicals/products to be stored/used onsite.

8. Incident Management

- Identify adequate incident management procedures to be established including notification requirements to the Appropriate Regulatory Authority and other relevant authorities for incidents that cause, or have the potential to cause material harm to the environment (Part 5.7 of the POEO Act).

9. Cumulative impacts

- Identify the extent that the receiving environment is already stressed by existing development and background levels of emissions to which this proposal will contribute.

G. Compilation of mitigation measures

- Outline how the proposal and its environmental protection measures would be implemented and managed in an integrated manner so as to demonstrate that the proposal is capable of complying with statutory obligations under EPA licences or approvals (e.g. outline of an environmental management plan).
- Include any Statement of Commitments to be made by the Proponent.

H. Justification for the proposed development and conclusion

Reasons should be included which justify undertaking the proposal in the manner proposed, having regard to the potential environmental impacts.

ATTACHMENT B: GUIDANCE MATERIAL

Assessing Noise and Vibration Impacts

Construction:

- Interim (Final) Construction Noise Guideline (DECC, 2009), accessed via:
<http://www.epa.nsw.gov.au/noise/constructnoise.htm>
- Assessing Vibration: a technical guidelines (DEC, 2006), accessed via:
<http://www.epa.nsw.gov.au/noise/vibrationguide.htm>

Operational:

- NSW Industrial Noise Policy (EPA, 2000/2001), accessed via:
<http://www.epa.nsw.gov.au/noise/industrial.htm>
- NSW Road Noise Policy (DECCW, 2011), accessed via:
<http://www.epa.nsw.gov.au/noise/traffic.htm>

Assessing Air Quality and Odour Impacts

Air Quality:

- Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (EPA, 2016), accessed via:
<http://www.epa.nsw.gov.au/air/appmethods.htm>
- No EPA specific guidance material exists for the control of dust from construction sites. Consideration should be given to the POEO Act and the Local Government Air Quality Toolkit (DECC, 2007), accessed via:
<http://www.epa.nsw.gov.au/air/lgaqt.htm>

Odour:

- Technical Framework - Assessment and Management of Odour from Stationary Sources in NSW (DEC, 2006), accessed via:
<http://www.epa.nsw.gov.au/air/odour.htm>
- Technical Notes - Assessment and Management of Odour from Stationary Sources in NSW (DEC, 2006), accessed via:
<http://www.epa.nsw.gov.au/air/odour.htm>

Assessing Land Contamination Impacts

- Multiple Guidelines, accessed via:
<http://www.epa.nsw.gov.au/clm/guidelines.htm>

Assessing Water Contamination Impacts

- Approved Methods for the Sampling and Analysis of Water Pollutants in New South Wales (DEC, 2004), accessed via:
http://www.epa.nsw.gov.au/Water_pollution/policy.htm
- Managing Urban Stormwater – Soils and Construction, 4th Edition (Landcom, 2004, revised 2006), accessed via:
<http://www.environment.nsw.gov.au/stormwater/publications.htm>
- Managing Urban Stormwater Addendum Publications, accessed via:
<http://www.environment.nsw.gov.au/stormwater/publications.htm>

Assessing Flooding Impacts

- Floodplain Development Manual (DIPNR, 2005), accessed via:
<http://www.environment.nsw.gov.au/floodplains/manual.htm>

Assessing Waste Types

- Waste Classification Guidelines – 4 Parts (EPA, 2014), accessed via:
<http://www.epa.nsw.gov.au/wasteregulation/classify-waste.htm>

Assessing Chemical and Fuel Storage

- Storage and Handling of Dangerous Goods – Code of Practice (WorkCover, 2005)
http://www.safework.nsw.gov.au/_data/assets/pdf_file/0005/50729/storage-handling-dangerous-goods-1354.pdf



File Ref. No: BFS17/2052 (SRID 8000001363)
 TRIM Doc. No: D17/63363
 Contact: Station Officer Mark Castelli

25 September 2017

Department of Planning & Environment
 Emma Barnet – Senior Planning Officer
 GPO Box 39
 SYDNEY NSW 2001

E: emma.barnet@planning.nsw.gov.au

Dear Ms Barnet

**Bulk Recovery Solutions Resource Recovery Facility
 16 Kerr Road, Ingleburn (SSD 8593)**

I refer to the Department of Planning & Environment's (the Department) correspondence dated 12 September 2017 and request for agency submissions for the Department's consideration when preparing the Secretary's Environmental Assessment Requirements (SEARs) for the subject development.

Station Officer Mark Castelli of Fire & Rescue NSW (FRNSW) attended a planning focus meeting held at Campbelltown City Council's offices on the 12 September 2017. The post-meeting inspection of the existing facility was also attended by the same officer.

Comment

FRNSW notes that the planned development proposes an increase in waste processing from 30,000 to 500,000 tonnes per annum (tpa) and an increase of on-site waste stockpiling from 5,000 tonnes to 90,000 tonnes. In addition, a wider range of waste product processed is proposed – including industrial waste and material resulting from product destruction.

We acknowledge that a majority of the waste material proposed to be processed is non-combustible (e.g. concrete, contaminated earth) however, as there is a proposed substantial increase in product throughput and stockpiling there is potential for a significant increase in combustible waste material (viz. industrial waste and product destruction). The hazards posed by increased stockpiling of combustible waste material and increased waste processing may warrant the enhancement of fire safety systems and site fire safety management.

In addition, as contaminated material will be processed there is also potential for an increased likelihood of hazardous material (hazmat) incidents.

To ensure that FRNSW can identify and accurately assess the potential fire and hazmat risks associated with the proposed development, it is critical that the environmental impact study (EIS) includes accurate information with respect to the nature of material processed on-site and the expected aggregate quantities of combustible material stockpiled.

Fire & Rescue NSW

ABN 12 593 473 110

www.fire.nsw.gov.au

Community Safety
 Directorate

Locked Bag 12,
 Greenacre NSW 2190

T (02) 9742 7434
 F (02) 9742 7483

Fire Safety Assessment Unit



The provision of accurate information will assist FRNSW make informed and appropriate recommendations with respect to fire safety systems and fire safety management of hazards (such as maximum stockpile sizes and pile configurations).

During the on-site inspection, it was noted that the existing premises has had recent building upgrades of the office areas of the existing development. These works include the installation of three levels of Class 5 offices which is separated from the warehouse/processing areas of the building by glazed wall construction. In addition, a glazed lift shaft is currently being constructed as an attachment to the glazed office part of the warehouse. It was not readily apparent as to how the minimum fire separation requirements of Part C2 of Volume One of the National Construction Code (NCC) is achieved.

Regarding our requirements for the EIS, FRNSW submits the following recommendations to the Department for consideration:

Recommendations

1. To facilitate accurate assessment of potential fire hazards, the fire hazard characteristics and the aggregate quantities of combustible waste product resulting from the proposed increase in product processing and stockpiling is requested to be addressed and detailed in the EIS.
2. The details of proposed fire hazard and hazardous material mitigation measures are requested to be addressed in the EIS.
3. It is also recommended that the existing building and proposed building works are audited to determine the level of compliance with Volume One of the National Construction Code. The level of NCC compliance of the existing building is recommended to be detailed in the EIS.

For further information please contact Mark Castelli of the Fire Safety Assessment Unit, referencing FRNSW file number BFS17/2052 (SRID 8000001363). Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours Sincerely



Jamie Vistnes
Manager, Fire Safety Policy Unit
Fire Safety Branch
Fire & Rescue NSW



Department of Primary Industries

OUT16/35897

Ms Bianca Thornton
Industry Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Bianca.thornton@planning.nsw.gov.au

Dear Ms Thornton

Ingleburn Resource Recovery Facility (SSD 7950) Request for Secretary's Environmental Assessment Requirements

I refer to your email of 13 September 2016 to the Department of Primary Industries (DPI) in respect to the above matter. Comment has been sought from relevant divisions of DPI. Views were also sought from NSW Department of Industry - Lands that are now a division of the broader Department and no longer within NSW DPI. Any further referrals to DPI can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

DPI has reviewed the request and, as no draft SEARs were provided, provides the following recommendations:

- The EIS should be required to include:
 - Assessment of any volumetric water licensing requirements (including those for ongoing water take following completion of the project).
 - The identification of an adequate and secure water supply for the life of the project. Confirmation that water can be sourced from an appropriately authorised and reliable supply. This is to include an assessment of the current market depth where water entitlement is required to be purchased.
 - Assessment of impacts on surface and ground water sources (both quality and quantity), related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, aquatic and groundwater dependent ecosystems, and measures proposed to reduce and mitigate these impacts.
 - Assessment of any potential cumulative impacts on water resources, and any proposed options to manage the cumulative impacts.
 - Assessment of potential impacts of contaminated water or waste on nearby watercourses and proposed measures to mitigate impacts.
 - Consideration of relevant policies and guidelines.

- A statement of where each element of the SEARs is addressed in the EIS (i.e. in the form of a table).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M. Isaacs', with a stylized, cursive script.

Mitchell Isaacs

Director, Planning Policy & Assessment Advice

27 September 2016

Emma Barnett

From: Andrew MacGee <Andrew.Macgee@campbelltown.nsw.gov.au>
Sent: Wednesday, 27 September 2017 1:22 PM
To: Emma Barnett
Subject: RE: Planning Focus Meeting for Bulk Recovery Solutions Resource Recovery Facility Ingleburn SSD 8593

Categories: Objective

Hi Emma,

Council's requirements follow:

- Compliance with EPA licensing
- Traffic impacts on Kerr Road, Aero Road, Lancaster Street and Henderson Road – details about queuing while waiting for loading/unloading – having particular regard to narrow entry/exit, number of vehicles, size of vehicles and position of existing weighbridge should it be proposed for continued use. IT was noted in the briefing that a lot of trucks would not be arriving at their maximum legal mass limit (in particular, vacuum trucks), so the number of trucks should be considered in that light, with evidence provided of similar uses that show the average loadings of these vehicles
- Consideration of the impacts the proposed tonnages would have on local road pavement lifespans (ESA measurements attributable to this development shall be considered along with deleterious impacts on pavement that the development at the proposed tonnage might cause) – attention should be focussed to where traffic on local roads is most likely to be concentrated – Aero and Kerr Roads
- Noise management shall be thoroughly addressed – noting proximity to residential development nearby
- Ensure that development is constrained to property – it was noted on site inspection it appeared that land not in the applicant's ownership was being utilised as part of the development along the rail corridor
- Full details of BCA assessment of unauthorised works internal to building in relation to office shall be supplied if that area is associated with this development – issue of a certificate pursuant to Section 149A of EP&A Act 1979 may be required
- Details regarding proposed community consultation during preparation of the EIS
- Assurance/details that existing easements to drain water would not be impacted upon by the proposal
- Particulate capture and treatment – Council has received complaints in the past at current operating capacity of particulates being released from the site
- Comprehensive clarification and data around the proposed quantities and types of materials that would be processed at the site
- Submission of detailed and correctly scaled architectural plans with the application – previous plans submitted over time at this site have been of less than desirable quality
- Control of any odours
- Details of any required Sydney Water approvals and assurance from Sydney Water that this development would not unreasonably impact on downstream sewer capacities (that might impact upstream existing residential development)
- Full detail and assessment by an appropriately qualified person of existing and proposed pollution control measures that are installed or proposed to be installed in stormwater collection system
- Refuelling station and similar do not have current development consent and are not considered likely to be appropriate within a water drainage easement
- Turning areas, vehicle storage areas and unloading/reversing truck movements shall be prepared by an appropriately qualified person for assessment. Should b-doubles be considered likely to service the site, consideration of exiting approved b-double routes shall be provided, as well as turning areas on site and the impact that these vehicles have on queuing
- Would request that a compliance/status audit of existing active consents that the applicant seeks to keep relying on is undertaken and presented for information

I am sorry it is late.

If there's any clarification required, please let me know.



22 September 2017

Our Reference: SYD17/01173 (A10178021)
DP&E Ref: SSD 8593

Director/Team Leader
Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: **Emma Barnet**

Dear Sir/Madam

**BULK RECOVERY SOLUTIONS RESOURCE RECOVERY FACILITY
16 KERR ROAD, INGLEBURN**

Reference is made to your correspondence dated 12 September 2017 requesting Roads and Maritime Services (Roads and Maritime) to provide details of key issues and assessment requirements regarding the abovementioned development for inclusion in the Secretary's Environmental Assessment Requirements (SEARs).

Roads and Maritime require the following issues to be included in the transport and traffic impact assessment of the proposed development:

1. Daily and peak traffic movements likely to be generated by the proposed development including the impact on nearby intersections and the need/associated funding for upgrading or road improvement works (if required). The key intersections to be examined/modelled include:
 - Hume MWY / Brooks Road
2. Details of the proposed accesses and the parking provisions associated with the proposed development including compliance with the requirements of the relevant Australian Standards (ie: turn paths, sight distance requirements, aisle widths, etc) and relevant parking codes. Swept path plans need to be provided.
3. Details of service vehicle movements (including vehicle type and likely arrival and departure times).
4. Roads and Maritime requires the environmental assessment report to assess the implications of the proposed development for non-car travel modes (including public transport use, walking and cycling); the potential for implementing a location-specific sustainable travel plan and the provision of facilities to increase the non-car mode share for travel to and from the site. This will entail an assessment of the accessibility of the development site by public transport.

Roads and Maritime Services

Any inquiries in relation to this Application can be directed to Amanda Broderick on 8849 2391 or development.sydney@rms.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'RCumming', written in a cursive style.

Rachel Cumming
Senior Land Use Assessment Coordinator
Network Sydney West Precinct