Planning Services
Industy Assessments
Contact: Shaun Williams
Phone: (02) 8275 1345
Email: shaun.williams@planning.nsw.gov.au

Our Ref: SSD 9766

Ernest Dupere
Managing Director
Benedict Recycling Pty Ltd
PO Box 431
Frenchs Forest, NSW 1640

Dear Mr Dupere

Planning Secretary's Environmental Assessment Requirements
Girraween Waste Recycling Transfer Facility (SSD 9766)

Please find attached a copy of the Planning Secretary's environmental assessment requirements (SEARs) for the preparation of an environmental impact statement (EIS) for the Girraween Waste Recycling Transfer Facility at 224-232 Toongabbie Road, Girraween in the Cumberland local government area (LGA).

The SEARs have been prepared in consultation with the relevant public authorities (see **Attachment 2**) based on the information you have provided to date. The Department is still waiting on comments from Cumberland Council. These will be sent to you shortly. Please note that the Planning Secretary may modify these requirements at any time. If you do not submit a Development Application (DA) and EIS for the development within two years, you must consult further with the Planning Secretary in relation to the preparation of the EIS. The Department of Planning and Environment (the Department) will review the EIS for the development carefully before putting it on public exhibition and will require you to submit an amended EIS if it does not adequately address the SEARs.

The Department wishes to emphasise the importance of effective and genuine community consultation where a comprehensive open and transparent community consultation engagement process must be undertaken during the preparation of the EIS. This process must ensure that the community is provided with a good understanding of what is proposed, description of any potential impacts and they are actively engaged in issues of concern to them.

Please contact the Department at least two weeks before you propose to submit your DA and EIS. This will enable the Department to:

- confirm the applicable fee (see Division 1AA, Part 15 of the *Environmental Planning and Assessment Regulation 2000*); and
- determine the number of copies (hard-copy and CD/DVD) of the DA and EIS that will be required for reviewing purposes.

If your development is likely to have a significant impact on matters of National Environmental Significance, it will require an approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This approval would be in addition to any approvals required under NSW legislation and it is your responsibility to contact the Commonwealth Department of the Environment to determine if an approval under the EPBC Act is required (http://www.environment.gov.au or 6274 1111).

If you have any questions, please contact Shaun Williams on the details listed above.

Yours sincerely

C. Ritchie 20/12/18.

Chris Ritchie
Director
Industry Assessments
As delegate of the Planning Secretary

Planning Secretary's Environmental Assessment Requirements

Section 4.12(8) of the *Environmental Planning and Assessment Act 1979* Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*

Application Number	SSD 9766
Project Name	Girraween Waste Recycling Transfer Facility
Development	A waste and recycling transfer facility with capacity to process up to 220,000 tonnes per annum (tpa) of co-mingled and segregated pre-classified general solid waste (non-putrescible) for recycling including: • Demolition of existing driveway, two-storey office building and existing weighbridge with weighbridge office; • Construction of a 7 metre (m) wide in-bound and out-bound driveway access; • Construction of a 12m tall waste acceptance and processing shed with an area of 1,740 metres squared (m^2); • Installation of two in-bound and two out-bound weighbridges with associated in-bound weighbridge office; and • On-site carparking and pedestrian walkways.
Location	224-232 Toongabbie Road, Girraween
Applicant	Benedict Recycling Pty Ltd
Date of Issue	21 December 2018
General Requirements	The Environmental Impact Statement (EIS) for the development must meet the form and content requirements in Clauses 6 and 7 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*. In addition, the EIS must include a: • detailed description of the development, including: – need for the proposed development; – justification for the proposed development; – likely staging of the development; – likely interactions between the development and existing, approved and proposed operations in the vicinity of the site; and – plans of any proposed building works. • consideration of all relevant environmental planning instruments, including identification and justification of any inconsistencies with these instruments; • consideration of issues discussed in **Attachment 2** (public authority responses to key issues); • risk assessment of the potential environmental impacts of the development, identifying the key issues for further assessment; • detailed assessment of the key issues specified below, and any other significant issues identified in this risk assessment, which includes: – a description of the existing environment, using sufficient baseline data; – an assessment of the potential impacts of all stages of the development, including any cumulative impacts, taking into

	consideration relevant guidelines, policies, plans and statutes; and – a description of the measures that would be implemented to avoid, minimise, mitigate and if necessary, offset the potential impacts of the development, including proposals for adaptive management and/or contingency plans to manage significant risks to the environment; and – consolidated summary of all the proposed environmental management and monitoring measures, highlighting commitments included in the EIS. The EIS must also be accompanied by a report from a qualified quantity surveyor providing: • a detailed calculation of the capital investment value (CIV) of the proposal as defined in clause 3 of the *Environmental Planning and Assessment Regulation 2000*, including details of all components of the CIV; • a close estimate of the jobs that will be created by the development during the construction and operational phases of the development; and • certification that the information provided is accurate at the date of preparation.
Key issues	The EIS must address the following specific matters: • **Community and Stakeholder Engagement –** including: - a detailed community and stakeholder participation strategy which identifies who in the community has been consulted and a justification for their selection, other stakeholders consulted and the form(s) of the consultation, including a justification for this approach; - a report on the results of the implementation of the strategy including issues raised by the community and surrounding occupiers and landowners that may be impacted by the proposal; - details of how issues raised during community and stakeholder consultation have been addressed and whether they have resulted in changes to the proposal; and - details of the proposed approach to future community and stakeholder engagement based on the results of the consultation. • **Waste Management** – including: - a description of the waste streams that would be accepted at the site including maximum daily, weekly and annual throughputs and the maximum size for stockpiles; - a description of waste processing operations (including flow diagrams for each waste stream) including a description of the technology to be installed, resource outputs, and the quality control measures that would be implemented including proposed procedures to ensure general solid waste is not contaminated by restricted, hazardous and/or liquid waste; - details of how waste would be stored (including the maximum daily waste storage capacity of the site) and handled on site, and transported to and from the site including details of how the receipt of non-conforming waste would be dealt with; - detail the developments waste tracking system for incoming and outgoing waste; - detail the quality of waste produced and final dispatch locations;

	- details of spoil disposal such as the quantity of spoil material to be generated; - strategies for handling, stockpiling, recycling and disposal of spoil; - maximisation of spoil material reuse in the construction industry; - identification of the history of spoil material and the management measures in the event of contaminated material; - details of the waste management strategy for demolition, construction and ongoing operational waste generated; and - the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the *NSW Waste Avoidance and Resource Recovery Strategy 2014-2021.* • **Suitability of the Site** – including: - details of all development consents and approved plans for the existing facility, including for all structures, plant and equipment; and - a detailed justification that the site can accommodate the proposed resource recovery facility, having regard to the scope of the operations of the existing facility and its environmental impacts and relevant mitigation measures. • **Soil & Water** – including: - characterisation of the nature and extent of contamination on the site and a description of proposed management measures; - a description of water and soil resources, topography, hydrology, watercourses and riparian lands on or nearby to the site; - a detailed site water balance including identification of water requirements for the life of the project, measures that would be implemented to ensure an adequate and secure water supply is available for the proposal and a detailed description of the measures to minimise the water use at the site; - characterisation of water quality at the point of discharge to surface and/or groundwater against the relevant water quality criteria (including details of the contaminants of concern that may leach from the waste into the wastewater and proposed mitigation measures to manage any impacts to receiving waters); - detailed flooding assessment; - details of stormwater/wastewater/leachate management systems including the capacity of onsite detention system/s, onsite sewage management and measures to treat, reuse or dispose of water; - a description of erosion and sediment controls; - an assessment of potential impacts to soil and water resources, topography, drainage lines, watercourses and riparian lands on or nearby to the site; and - consideration of salinity and acid sulphate soil impacts. • **Air Quality and Odour** – including: - a quantitative assessment of the potential air quality, dust and odour impacts of the development in accordance with relevant Environment Protection Authority guidelines. This is to include the identification of existing and potential future sensitive receivers and consideration of approved and/or proposed developments in the vicinity;

	- the details of buildings and air handling systems and strong justification (including quantitative evidence) for any material handling, processing or stockpiling external to a building; - a greenhouse gas assessment; and - details of proposed mitigation, management and monitoring measures. • **Noise and Vibration** – including: - a quantitative assessment of potential demolition, construction, operational and transport noise and vibration impacts in accordance with relevant Environment Protection Authority guidelines. This is to include the identification of existing and potential future sensitive receivers and consideration of approved and/or proposed developments in the vicinity; - details and justification of the proposed noise mitigation and monitoring measures; and - Specify the times of operation for all phases of the development and for all noise producing activities. • **Traffic and Transport** – including: - details of all traffic types and volumes likely to be generated during construction and operation, including a description of haul routes; - an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model. This is to include the identification and consideration of approved and/or proposed developments in the vicinity; - an assessment of the existing and future performance of key intersections providing access to the site (Elizabeth Drive and Range Road), and any upgrades (road/ intersections) required as a result of the development; - details of any likely dangerous goods to be transported on arterial and local roads to/from the site, if any, and the preparation of an incident management strategy, if necessary; - detailed plans of the proposed layout of the internal road and pedestrian network and parking on site in accordance with the relevant Australian Standards; - plans of any proposed road upgrades, infrastructure works or new roads required for the development; - plans demonstrating how all vehicles associated with construction and operation awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network; and - swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site for both heavy and light vehicles. • **Fire and Incident Management** – including: - an assessment of bushfire risks and asset protection zones (APZ) in accordance with NSW Rural Fire Service guidelines; and - technical information on the environmental protection equipment to be installed on the premises such as air, water and noise controls, spill clean-up equipment and fire (including management of fire water, location of fire hydrants and water flow rates at the hydrant) management and containment measures.

	• **Hazards** – including an assessment of the potential fire risks of the development. • **Biodiversity** – including: - Assessment of biodiversity impacts in accordance with the *Biodiversity Assessment Method* and documented in a Biodiversity Development Assessment Report (BDAR).
Consultation	During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with: • Environment Protection Authority • Cumberland Council • NSW Roads and Maritime Services • Office of Environment and Heritage • NSW Fire and Rescue • Local community and other stakeholders The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.
Further consultation after 2 years	If you do not lodge a Development Application and EIS for the development within 2 years of the issue date of these SEARs, you must consult further with the Secretary in relation to the preparation of the EIS.
References	The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans as identified. While not exhaustive, the following attachment contains a list of some of the guidelines, policies, and plans that may be relevant to the environmental assessment of this proposal.

ATTACHMENT 1
Technical and Policy Guidelines

The following guidelines may assist in the preparation of the environmental impact statement. This list is not exhaustive and not all of these guidelines may be relevant to your proposal.

Many of these documents can be found on the following websites:
http://www.planning.nsw.gov.au
http://www.shop.nsw.gov.au/index.jsp
http://www.australia.gov.au/publications

Plans and Documents	
	The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. Provide these as part of the EIS rather than as separate documents. In addition, the EIS must include the following: 1. An existing site survey plan drawn at an appropriate scale illustrating: • the location of the land, boundary measurements, area (sqm) and north point • the existing levels of the land in relation to buildings and roads • location and height of existing structures on the site • location and height of adjacent buildings and private open space • all levels to be to Australian Height Datum (AHD). 2. Locality/context plan drawn at an appropriate scale should be submitted indicating: • significant local features such as heritage items • the location and uses of existing buildings, shopping and employment areas • traffic and road patterns, pedestrian routes and public transport nodes. 3. Drawings at an appropriate scale illustrating: • detailed plans, sections and elevations of the existing building, which clearly show all proposed internal and external alterations and additions.
Documents to be Submitted	
	Documents to submit include: • 1 hard copy and 1 electronic copy of all the documents and plans for review prior to exhibition • Other copies as determined by the Department once the development application is lodged.

Policies, Guidelines & Plans

Aspect	Policy / Methodology
Visual	
	Control of Obtrusive Effects of Outdoor Lighting (Standards Australia, AS 2482)
Traffic, Transport and Access	
	Roads Act 1993
	State Environmental Planning Policy (Infrastructure) 2007
	Guide to Traffic Generating Development (Roads and Maritime Services)
	Road Design Guide (Roads and Maritime Services)
	Austroads Guide to Traffic Management – Pt 12: Traffic Impacts of Development
	Austroads Guidelines for Planning and Assessment of Road Freight Access in Industrial Areas
	NSW Long Term Transport Master Plan
Soils and Water	
Soil	Australian and New Zealand Guidelines for the Assessment and Management of Contaminated Sites (ANZECC & NHMRC)
	National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPC)
	State Environmental Planning Policy No. 55 – Remediation of Land
	Managing Land Contamination - Planning Guidelines SEPP 55 – Remediation of Land (DUAP and EPA)
Acid Sulfate Soils	Acid Sulfate Soil Manual (ASSMAC)
Erosion and Sediment	Managing Urban Stormwater: Soils & Construction (Landcom)
	Design Manual for Soil Conservation Works - Technical Handbook No. 5 (Soil Conservation Service of NSW)
	Soil and Landscape Issues in Environmental Impact Assessment (DLWC)
	Wind Erosion – 2nd Edition
Groundwater	National Water Quality Management Strategy Guidelines for Groundwater Protection in Australia (ARMCANZ/ANZECC)
	NSW State Groundwater Policy Framework Document (DLWC)
	NSW State Groundwater Quality Protection Policy (DLWC)
	NSW State Groundwater Quantity Management Policy (DLWC) Draft
	The NSW State Groundwater Dependent Ecosystem Policy (DLWC)
	NSW Aquifer Interference Policy (NOW)
	Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources (NOW) 2011
	Bunding and Spill Management (EPA)
Stormwater	Managing Urban Stormwater: Strategic Framework. Draft (EPA)
	Managing Urban Stormwater: Council Handbook. Draft (EPA)
	Managing Urban Stormwater: Treatment Techniques (EPA)
	Managing Urban Stormwater: Source Control. Draft (EPA)
	Managing Urban Stormwater: Harvesting and Reuse (DEC)
Wastewater	National Water Quality Management Strategy: Guidelines for Sewerage Systems - Effluent Management (ARMCANZ/ANZECC)
	National Water Quality Management Strategy: Guidelines for Sewerage Systems - Use of Reclaimed Water (ARMCANZ/ANZECC)
	National Water Quality Management Strategy - Guidelines For Water Recycling: Managing Health And Environmental Risks (Phase1) (EPHC, NRMMC & AHMC)
Noise and Vibration	
	Assessing Vibration: A Technical Guide (DEC, 2006)
	Noise Policy for Industry (EPA, 2017)
	Environmental Criteria for Road Traffic Noise (EPA, 1999)

Policies, Guidelines & Plans	
Aspect	**Policy / Methodology**
	Noise Guide for Local Government (EPA, 2013)
	Interim Construction Noise Guideline (DECC, 2009)
Air Quality	
	Protection of the Environment Operations (Clean Air) Regulation 2002
	Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales (DEC)
	Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (EPA 2016)
Greenhouse Gas	
	AGO Factors and Methods Workbook (AGO)
	Guidelines for Energy Savings Action Plans (DEUS, 2005)
Hazards and Risk	
	State Environmental Planning Policy No. 33 – Hazardous and Offensive Development
	Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines (DUAP)
	Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis
Waste	
	Waste Avoidance and Resource Recovery Strategy 2014-21 (EPA)
Bushfire	
	Planning for Bushfire Protection (Rural Fire Service, 2006)
Biodiversity	
	The Biodiversity Assessment Method (OEH, 2017)

ATTACHMENT 2
Government Authority Responses to Request for Key Issues
For Information Only

Department of Planning & Environment
Industry Assessments
GPO Box 39
Sydney NSW 2001

Attention: Shaun Williams

Notice Number	1573183
Date	05-Dec-2018

Dear Mr Williams

RE: Proposed Waste Recycling & Transfer Facility

Lot 678 DP 9157 Toongabbie Road Girraween

I refer to your request for the Environment Protection Authority's (EPA) requirements for the environmental assessment (EA) in regard to the above proposal received by EPA on 28 November 2018.

The EPA has considered the details of the proposal as provided by Department of Planning & Environment (DPE) and has identified the information it requires to issue its general terms of approval in Attachment A. In summary, the EPA's key information requirements for the proposal include an adequate assessment of:

1. Air quality (including dust, odour, other air emissions assessment modelling and management)
2. Noise impact
3. Waste acceptance, storage, processing, re-use, management and disposal
4. Surface water and waste water management
5. Site contamination

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

Please note that this response does not cover biodiversity or Aboriginal cultural heritage issues, which are the responsibility of the Office of Environment and Heritage.

The Proponent should be made aware that any commitments made in the EA may be formalised as approval conditions and may also be placed as formal licence conditions.

The Proponent should be made aware that, consistent with provisions under Part 9.4 of the *Protection of the Environment Operations Act 1997* (Act) the EPA may require the provision of a financial assurance and/or assurances. The amount and form of the assurance(s) would be determined by the EPA and required as a condition of an Environment Protection Licence (EPL).

In addition, as a requirement of an EPL, the EPA will require the Proponent to prepare, test and implement a Pollution Incident Response Management Plan and/or Plans in accordance with Section 153A of the Act.

The EPA requests that an electronic copy of the EIS is submitted for assessment. The EIS should be directed to waste.operations@epa.nsw.gov.au

If you have any queries regarding this matter please contact EPA Officer Michaela Burgess on (02) 9995 6025.

Yours sincerely

.....

Greg Sheehy

Director Waste Compliance

Waste & Resource Recovery

(by Delegation)

ATTACHMENT A: EIS REQUIREMENTS FOR

Key Issues for Proposed Waste Recycling & Transfer Facility Toongabbie Road Girraween

Air

The EIS must:

- Assess the risk associated with potential discharges of fugitive and point source emissions. This assessment should include analysis of risks relating to environmental harm, risks to human health and amenity.

- Justify the level of assessment undertaken on the basis of risk factors including but not limited to:

  a. proposal location

  b. characteristics of the receiving environment

  c. type and quantity of pollutants emitted

- Describe the receiving environment in detail. The project must be contextualised within the receiving environment (local, regional, inter-regional as appropriate). The description must include but is not limited to:

  a. meteorology and climate

  b. topography

  c. surrounding land use and receptors

  d. ambient air quality

- Include a detailed description of the proposal. All processes that could result in air emissions (including odour) must be identified and described. Sufficient detail which accurately describes and quantifies the characteristics and quantity of all emissions must be provided.

- Include a detailed emissions inventory for the proposal. All point and fugitive sources are to be included in the inventory together with estimates of emission concentrations and rate of all air pollutants emitted. Any nominated controls must be explicitly linked to calculated emission reductions adopted in the air quality impact assessment emissions inventory, with all assumptions documented and justified.

- Include a consideration of 'worst case' emissions scenarios and impacts at proposed emission limits.

- Account for cumulative impacts associated with existing emission sources as well as any currently approved developments linked to the receiving environment.

- Include air dispersion modelling where there is a risk of adverse air quality impacts. Air dispersion modelling must be conducted in accordance with the *Approved Methods for Modelling and Assessment of Air Pollutants in NSW (2005)*.

- Demonstrate the proposal's ability to comply with the relevant regulatory frameworks, specifically the *Protection of the Environment Operations Act (1997)* and the *Protection of the Environment Operations (Clean Air) Regulation (2010)*.

Waste

The EIS must provide details of:

- The proposed sources, types, quantities and classifications of all waste to be treated at the facility. This must include details of how the input wastes will comply with the applicable resource recovery criteria.

- The procedures for the assessment, handling, storage, transport and disposal of all waste produced by the facility.

- Waste management at the facility including:

  a. the transportation, assessment and handling of waste arriving at or generated at the facility

  b. any stockpiling of wastes or recovered materials at the facility including stockpile footprints, heights and locations

  c. any waste processing related to the facility including reuse, recycling, reprocessing or treatment.

  d. the method for disposing of residual waste from the facility

  e. the emissions arising from the handling, storage, processing and reprocessing of waste at the facility

  f. the proposed controls for managing the environmental impacts of these activities.

- The quantity, type and specifications for all output products proposed to be produced from the facility. The description should include the physical, chemical and biological characteristics (including contaminate concentrations) of the output products as well as relevant accredited standards against which the products would comply. In documenting or describing the composition of the output products and/or wastes generated from the proposed facility, reference should be made to the relevant EPA

resource recovery exemption or waste classification guideline.

- Identify, characterise and classify all waste that is proposed to be disposed of, including proposed quantities of waste and the disposal locations for the waste.

- Outline the procedures that will be implemented to control inputs to the facility, including contingency measures that would be activated in the event that ineligible wastes are received at the facility.

- Provide a detailed explanation of how the facility will adhere to the EPA *Standards for Managing Construction Waste in NSW (2018).*

Noise

The EIS must:

- Provide details of the facility's operating hours and types of plant and equipment intended to be used during operations.

- Include details of the predicted increase in traffic created by the operation as well as the likely routes to be taken to and from the facility to the main thoroughfares.

- Include details of any sensitive noise receptors likely to be affected by the activities at the facility.

- Determine the existing amenity noise levels in accordance with the EPA *Noise Policy for Industry (2017).*

- Provide project specific noise levels for the facility at potentially affected receivers in accordance with the EPA *Noise Policy for Industry (2017).*

- Provide an assessment of the potential noise from the construction and operation of the facility to impact the surrounding community and any sensitive receivers. The assessment should be prepared in accordance with:

  a. the *Interim Construction Noise Guidelines (2009)*

  b. the *Noise Policy for Industry (2017)*

  c. the *Assessing Vibration: a technical guideline (2006)*

Water

The EIS must provide details of:

- Stormwater management during the construction and operation of the facility.

- How leachate from stockpiled waste material will be managed and separated from stormwater run off.

- Leachate management at the facility including any proposed onsite containment systems, transport, and/or disposal.

- Measures which will be implemented to avoid discharge from any leachate or stormwater detention basins and mitigate pollution of any near-by waterbodies, water courses and the stormwater system.

Odour

The EIS must provide:

- Provide a quantitative assessment of the potential odour impacts from the construction and operations of the proposal on surrounding receptors.

- Details on the nature of any waste that is proposed to be stored inside and outside the facility, the proposed quantities and location of that waste, the period of time the waste will be stored and any mitigation measures to be implemented to ensure that the waste does not generate odour and impact surrounding receivers.

- The odour impact assessment must be in accordance with the *Technical Framework and Notes for the Assessment and Management of Odour from Stationary Sources in NSW (2006)*.

Site Contamination

The EIS must:

- Undertake an appropriate assessment of potential site contamination in accordance with the *Contaminated Land Management Act (1997)*, the *Contaminated Land Management Regulation (2013)*, and OEH *Guidelines for Consultants Reporting on Contaminated Sites (2011)*. The contamination assessment should address the following:

  a. the nature and extent of any contamination of the land

  b. the nature and extent of any management of actual or possible contamination of the land

  c. whether the land is suitable for the proposed activities

  d. if necessary, what management is required before the land is suitable for its proposed use

- The above contamination assessment should be subject to a site audit undertaken by an accredited site auditor under the *Contaminated Land Management Act (1997)* in accordance with the EPA *Guidelines*

for the NSW Site Auditor Scheme (2017). The site audit should include the development of a site audit statement and site audit report. Outcomes from the audit should be included as an addendum to the EIS.

ATTACHMENT B: EIS REQUIREMENTS FOR

Waste Recycling & Transfer Facility - Toongabbie Road Girraween

How to use these requirements

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

A. Executive summary

B. The proposal

C. The location

D. Identification and prioritisation of issues

E. The environmental issues

F. List of approvals and licences

G. Compilation of mitigation measures

H. Justification for the proposal

A Executive summary

The executive summary should include a brief discussion of the extent to which the proposal achieves identified environmental outcomes.

B The proposal

1. Objectives of the proposal

- The objectives of the proposal should be clearly stated and refer to:
  a) the size and type of the operation, the nature of the processes and the products, by-products and wastes produced
  b) a life cycle approach to the production, use or disposal of products
  the anticipated level of performance in meeting required environmental standards and cleaner production principles
  c) the staging and timing of the proposal and any plans for future expansion
  d) the proposal's relationship to any other industry or facility.

2. Description of the proposal

General

- Outline the production process including:
  a) the environmental "mass balance" for the process – quantify in-flow and out-flow of materials, any points of discharge to the environment and their respective destinations (sewer, stormwater, atmosphere, recycling, landfill etc)
  b) any life-cycle strategies for the products.
- Outline cleaner production actions, including:
  a) measures to minimise waste (typically through addressing source reduction)
  b) proposals for use or recycling of by-products
  c) proposed disposal methods for solid and liquid waste
  d) air management systems including all potential sources of air emissions, proposals to re-use or treat emissions, emission levels relative to relevant standards in regulations, discharge points
  e) water management system including all potential sources of water pollution, proposals for re-use, treatment etc, emission levels of any wastewater discharged, discharge points, summary of options explored to avoid a discharge, reduce its frequency or reduce its impacts, and rationale for selection of option to discharge.
  f) soil contamination treatment and prevention systems.
- Outline construction works including:
  a) actions to address any existing soil contamination
  b) any earthworks or site clearing; re-use and disposal of cleared material (including use of spoil on-site)
  c) construction timetable and staging; hours of construction; proposed construction methods

d) environment protection measures, including noise mitigation measures, dust control measures and erosion and sediment control measures.

- Include a site diagram showing the site layout and location of environmental controls.

Air

- Identify all sources or potential sources of air emissions from the development.

  Note: emissions can be classed as either:

  - *point (e.g. emissions from stack or vent) or*
  - *fugitive (from wind erosion, leakages or spillages, associated with loading or unloading, conveyors, storage facilities, plant and yard operation, vehicle movements (dust from road, exhausts, loss from load), land clearing and construction works).*
- Provide details of the project that are essential for predicting and assessing air impacts including:

  a) the quantities and physio-chemical parameters (e.g. concentration, moisture content, bulk density, particle sizes etc) of materials to be used, transported, produced or stored

  b) an outline of procedures for handling, transport, production and storage

  c) the management of solid, liquid and gaseous waste streams with potential to generate emissions to air.

Noise and vibration

- Identify all noise sources or potential sources from the development (including both construction and operation phases). Detail all potentially noisy activities including ancillary activities such as transport of goods and raw materials.
- Specify the times of operation for all phases of the development and for all noise producing activities.
- For projects with a significant potential traffic noise impact provide details of road alignment (include gradients, road surface, topography, bridges, culverts etc), and land use along the proposed road and measurement locations – diagrams should be to a scale sufficient to delineate individual residential blocks.

Water

- Provide details of the project that are essential for predicting and assessing impacts to waters including:

  a) the quantity and physio-chemical properties of all potential water pollutants and the risks they pose to the environment and human health, including the risks they pose to Water Quality Objectives in the ambient waters (as defined on http://www.environment.nsw.gov.au/ieo/index.htm, using technical criteria derived from *the Australian and New Zealand Guidelines for Fresh and Marine Water Quality*, ANZECC 2000)

  b) the management of discharges with potential for water impacts

  c) drainage works and associated infrastructure; land-forming and excavations; working capacity of structures; and water resource requirements of the proposal.

- Outline site layout, demonstrating efforts to avoid proximity to water resources (especially for activities with significant potential impacts e.g. effluent ponds) and showing potential areas of modification of contours, drainage etc.
- Outline how total water cycle considerations are to be addressed showing total water balances for the development (with the objective of minimising demands and impacts on water resources). Include water requirements (quantity, quality and source(s)) and proposed storm and wastewater disposal, including type, volumes, proposed treatment and management methods and re-use options.

Waste and chemicals

Provide details of the quantity and type of both liquid waste and non-liquid waste generated, handled, processed or disposed of at the premises. Waste must be classified according to the EPA's *Waste Classification Guidelines 2014 (as amended from time to time)*

- Provide details of liquid waste and non-liquid waste management at the facility, including:
  a) the transportation, assessment and handling of waste arriving at or generated at the site
  b) any stockpiling of wastes or recovered materials at the site
  c) any waste processing related to the facility, including reuse, recycling, reprocessing (including composting) or treatment both on- and off-site

  the method for disposing of all wastes or recovered materials at the facility

  d) the emissions arising from the handling, storage, processing and reprocessing of waste at the facility
  e) the proposed controls for managing the environmental impacts of these activities.
- Provide details of spoil disposal with particular attention to:
  a) the quantity of spoil material likely to be generated
  b) proposed strategies for the handling, stockpiling, reuse/recycling and disposal of spoil
  c) the need to maximise reuse of spoil material in the construction industry
  d) identification of the history of spoil material and whether there is any likelihood of contaminated material, and if so, measures for the management of any contaminated material
  e) designation of transportation routes for transport of spoil.
- Provide details of procedures for the assessment, handling, storage, transport and disposal of all hazardous and dangerous materials used, stored, processed or disposed of at the site, in addition to the requirements for liquid and non-liquid wastes.
- Provide details of the type and quantity of any chemical substances to be used or stored and describe arrangements for their safe use and storage.

- Reference should be made to the guidelines: EPA's *Waste Classification Guidelines 2014 (as amended from time to time)*

ESD

- Demonstrate that the planning process and any subsequent development incorporates objectives and mechanisms for achieving ESD, including:

an assessment of a range of options available for use of the resource, including the benefits of each option to future generations

proper valuation and pricing of environmental resources

f) identification of who will bear the environmental costs of the proposal.

3. Rehabilitation

- Outline considerations of site maintenance, and proposed plans for the final condition of the site (ensuring its suitability for future uses).

4. Consideration of alternatives and justification for the proposal

- Consider the environmental consequences of adopting alternatives, including alternative:
  a) sites and site layouts
  b) access modes and routes
  c) materials handling and production processes
  d) waste and water management
  e) impact mitigation measures
  f) energy sources
- Selection of the preferred option should be justified in terms of:
  a) ability to satisfy the objectives of the proposal
  b) relative environmental and other costs of each alternative
  c) acceptability of environmental impacts and contribution to identified environmental objectives
  d) acceptability of any environmental risks or uncertainties
  e) reliability of proposed environmental impact mitigation measures
  f) efficient use (including maximising re-use) of land, raw materials, energy and other resources.

C The location

1. General

- Provide an overview of the affected environment to place the proposal in its local and regional environmental context including:
  a) meteorological data (e.g. rainfall, temperature and evaporation, wind speed and direction)
  b) topography (landform element, slope type, gradient and length)
  c) surrounding land uses (potential synergies and conflicts)
  d) geomorphology (rates of landform change and current erosion and deposition processes)
  e) soil types and properties (including erodibility; engineering and structural properties; dispersibility; permeability; presence of acid sulfate soils and potential acid sulfate soils)
  f) ecological information (water system habitat, vegetation, fauna)
  g) availability of services and the accessibility of the site for passenger and freight transport.

2. Air

- Describe the topography and surrounding land uses. Provide details of the exact locations of dwellings, schools and hospitals. Where appropriate provide a perspective view of the study area such as the terrain file used in dispersion models.
- Describe surrounding buildings that may effect plume dispersion.
- Provide and analyse site representative data on following meteorological parameters:
  a) temperature and humidity
  b) rainfall, evaporation and cloud cover
  c) wind speed and direction
  d) atmospheric stability class
  e) mixing height (the height that emissions will be ultimately mixed in the atmosphere)
  f) katabatic air drainage
  g) air re-circulation.

3. Noise and vibration

- Identify any noise sensitive locations likely to be affected by activities at the site, such as residential properties, schools, churches, and hospitals. Typically the location of any noise sensitive locations in relation to the site should be included on a map of the locality.
- Identify the land use zoning of the site and the immediate vicinity and the potentially affected areas.

4. Water

- Describe the catchment including proximity of the development to any waterways and provide an assessment of their sensitivity/significance from a public health, ecological and/or economic perspective. The Water Quality and River Flow Objectives on the website: http://www.environment.nsw.gov.au/ieo/index.htm should be used to identify the agreed environmental values and human uses for any affected waterways. This will help with the description of the local and regional area.

5. Soil Contamination Issues

- Provide details of site history – if earthworks are proposed, this needs to be considered with regard to possible soil contamination, for example if the site was previously a landfill site or if irrigation of effluent has occurred.

D Identification and prioritisation of issues / scoping of impact assessment

- Provide an overview of the methodology used to identify and prioritise issues. The methodology should take into account:
  a) relevant NSW government guidelines
  b) industry guidelines
  c) EISs for similar projects
  d) relevant research and reference material
  e) relevant preliminary studies or reports for the proposal
  f) consultation with stakeholders.
- Provide a summary of the outcomes of the process including:
  a) all issues identified including local, regional and global impacts (e.g. increased/ decreased greenhouse emissions)
  b) key issues which will require a full analysis (including comprehensive baseline assessment)
  c) issues not needing full analysis though they may be addressed in the mitigation strategy
  d) justification for the level of analysis proposed (the capacity of the proposal to give rise to high concentrations of pollution compared with the ambient environment or environmental outcomes is an important factor in setting the level of assessment).

E The environmental issues

1. General

- The potential impacts identified in the scoping study need to be assessed to determine their significance, particularly in terms of achieving environmental outcomes, and minimising environmental pollution.
- Identify gaps in information and data relevant to significant impacts of the proposal and any actions proposed to fill those information gaps so as to enable development of appropriate management and mitigation measures. This is in accordance with ESD requirements.

Note: The level of detail should match the level of importance of the issue in decision making which is dependent on the environmental risk.

Describe baseline conditions

- Provide a description of existing environmental conditions for any potential impacts.

Assess impacts

- For any potential impacts relevant for the assessment of the proposal provide a detailed analysis of the impacts of the proposal on the environment including the cumulative impact of the proposal on the receiving environment especially where there are sensitive receivers.
- Describe the methodology used and assumptions made in undertaking this analysis (including any modelling or monitoring undertaken) and indicate the level of confidence in the predicted outcomes and the resilience of the environment to cope with the predicted impacts.
- The analysis should also make linkages between different areas of assessment where necessary to enable a full assessment of environmental impacts e.g. assessment of impacts on air quality will often need to draw on the analysis of traffic, health, social, soil and/or ecological systems impacts; etc.
- The assessment needs to consider impacts at all phases of the project cycle including: exploration (if relevant or significant), construction, routine operation, start-up operations, upset operations and decommissioning if relevant.
- The level of assessment should be commensurate with the risk to the environment.

Describe management and mitigation measures

- Describe any mitigation measures and management options proposed to prevent, control, abate or mitigate identified environmental impacts associated with the proposal and to reduce risks to human health and prevent the degradation of the environment. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.
- Proponents are expected to implement a 'reasonable level of performance' to minimise environmental impacts. The proponent must indicate how the proposal meets reasonable levels of performance. For example, reference technology based criteria if available, or identify good practice for this type of activity or development. A 'reasonable level of performance' involves adopting and implementing technology and

management practices to achieve certain pollutant emissions levels in economically viable operations. Technology-based criteria evolve gradually over time as technologies and practices change.

- Use environmental impacts as key criteria in selecting between alternative sites, designs and technologies, and to avoid options having the highest environmental impacts.
- Outline any proposed approach (such as an Environmental Management Plan) that will demonstrate how commitments made in the EIS will be implemented. Areas that should be described include:

  a) operational procedures to manage environmental impacts

  b) monitoring procedures

  c) training programs

  d) community consultation

  e) complaint mechanisms including site contacts

  f) strategies to use monitoring information to improve performance

  g) strategies to achieve acceptable environmental impacts and to respond in event of exceedences.

4. Air

Describe baseline conditions

- Provide a description of existing air quality and meteorology, using existing information and site representative ambient monitoring data. Please refer to Attachment A for specific requirements for air assessment.

Assess impacts

- Identify all pollutants of concern and estimate emissions by quantity (and size for particles), source and discharge point.
- Estimate the resulting ground level concentrations of all pollutants. Where necessary (e.g. potentially significant impacts and complex terrain effects), use an appropriate dispersion model to estimate ambient pollutant concentrations. Discuss choice of model and parameters with the EPA.
- Describe the effects and significance of pollutant concentration on the environment, human health, amenity and regional ambient air quality standards or goals.
- Describe the contribution that the development will make to regional and global pollution, particularly in sensitive locations.
- For potentially odorous emissions provide the emission rates in terms of odour units (determined by techniques compatible with EPA procedures). Use sampling and analysis techniques for individual or complex odours and for point or diffuse sources, as appropriate.

  Note: With dust and odour, it may be possible to use data from existing similar activities to generate emission rates.

- Reference should be made to the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (DEC, 2016); *Approved Methods for the Sampling and Analysis of Air Pollutants in NSW* (DEC,

2007); *Assessment and Management of Odour from Stationary Sources in NSW* (DEC, 2006); *Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (DEC, 2006); Load Calculation Protocol for use by holders of NSW Environment Protection Licences when calculating Assessable Pollutant Loads* (DECC, 2009).

Describe management and mitigation measures

- Outline specifications of pollution control equipment (including manufacturer's performance guarantees where available) and management protocols for both point and fugitive emissions. Where possible, this should include cleaner production processes.

5. Noise and vibration

Describe baseline conditions

- Determine the existing background (LA90) and ambient (LAeq) noise levels, as relevant, in accordance with the *NSW Noise Policy for Industry*.
- Determine the existing road traffic noise levels in accordance with the *NSW Road Noise Policy*, where road traffic noise impacts may occur.
- The noise impact assessment report should provide details of all monitoring of existing ambient noise levels including:
  a) details of equipment used for the measurements
  b) a brief description of where the equipment was positioned
  c) a statement justifying the choice of monitoring site(s), including the procedure used to choose the site(s), having regards to Fact Sheets A and B of the *NSW Noise Policy for Industry*.
  d) details of the exact location of the monitoring site and a description of land uses in surrounding areas
  e) a description of the dominant and background noise sources at the site
  f) day, evening and night assessment background levels for each day of the monitoring period
  g) the final Rating Background Level (RBL) value
  h) graphs of the measured noise levels for each day should be provided
  i) a record of periods of affected data (due to adverse weather and extraneous noise), methods used to exclude invalid data and a statement indicating the need for any re-monitoring.

Assess impacts

- Determine the project noise trigger levels for the site. For each identified potentially affected receiver, this should include:
  a) determination of the project intrusive noise level for each identified potentially affected receiver
  b) selection and justification of the appropriate amenity category for each identified potentially affected receiver
  c) determination of the project amenity noise level for each receiver

d) determination of the appropriate maximum noise level event assessment (sleep disturbance) trigger level.

- Maximum noise levels during night-time period (10pm-7am) should be assessed to analyse possible affects on sleep. Determine expected noise level and noise character likely to be generated from noise sources during:

  a) site establishment

  b) construction

  c) operational phases

  d) transport including traffic noise generated by the proposal

  e) other services.

  Note: The noise impact assessment report should include noise source data for each source in 1/1 or 1/3 octave band frequencies including methods for references used to determine noise source levels. Noise source levels and characteristics can be sourced from direct measurement of similar activities or from literature (if full references are provided).

- Determine the noise levels likely to be received at the reasonably most affected location(s) (these may vary for different activities at each phase of the development).
- The noise impact assessment report should include:

  a) a plan showing the assumed location of each noise source for each prediction scenario

  b) a list of the number and type of noise sources used in each prediction scenario to simulate all potential significant operating conditions on the site

  c) any assumptions made in the predictions in terms of source heights, directivity effects, shielding from topography, buildings or barriers, etc

  d) methods used to predict noise impacts including identification of any noise models used.

  e) the weather conditions considered for the noise predictions

  f) the predicted noise impacts from each noise source as well as the combined noise level for each prediction scenario

  g) for developments where a significant level of noise impact is likely to occur, noise contours for the key prediction scenarios should be derived

  h) an assessment of the need to include modification factors as detailed in Fact Sheet C of the *NSW Noise Policy for Industry*.

- Discuss the findings from the predictive modelling and, where relevant noise criteria have not been met, recommend additional feasible and reasonable mitigation measures.
- The noise impact assessment report should include details of any mitigation proposed including the attenuation that will be achieved and the revised noise impact predictions following mitigation.

  a) Where relevant noise/vibration levels cannot be met after application of all feasible and reasonable mitigation measures the residual level of noise impact needs to be quantified

- For the assessment of existing and future traffic noise, details of data for the road should be included such as assumed traffic volume; percentage heavy vehicles by time of day; and details of the calculation process. These details should be consistent with any traffic study carried out in the EIS.

- Where blasting is intended an assessment in accordance with the *Technical Basis for Guidelines to Minimise Annoyance due to Blasting Overpressure and Ground Vibration* (ANZECC, 1990) should be undertaken. The following details of the blast design should be included in the noise assessment:
  a) bench height, burden spacing, spacing burden ratio
  b) blast hole diameter, inclination and spacing
  c) type of explosive, maximum instantaneous charge, initiation, blast block size, blast frequency.

Describe management and mitigation measures

- Determine the most appropriate noise mitigation measures and expected noise reduction including both noise controls and management of impacts for both construction and operational noise. This will include selecting quiet equipment and construction methods, noise barriers or acoustic screens, location of stockpiles, temporary offices, compounds and vehicle routes, scheduling of activities, etc.
- For traffic noise impacts, provide a description of the ameliorative measures considered (if required), reasons for inclusion or exclusion, and procedures for calculation of noise levels including ameliorative measures. Also include, where necessary, a discussion of any potential problems associated with the proposed ameliorative measures, such as overshadowing effects from barriers. Appropriate ameliorative measures may include:
  a) use of alternative transportation modes, alternative routes, or other methods of avoiding the new road usage
  b) control of traffic (eg: limiting times of access or speed limitations)
  c) resurfacing of the road using a quiet surface
  d) use of (additional) noise barriers or bunds
  e) treatment of the façade to reduce internal noise levels buildings where the night-time criteria is a major concern
  f) more stringent limits for noise emission from vehicles (i.e. using specially designed 'quite' trucks and/or trucks to use air bag suspension
  g) driver education
  h) appropriate truck routes
  i) limit usage of exhaust brakes
  j) use of premium muffles on trucks
  k) reducing speed limits for trucks
  l) ongoing community liaison and monitoring of complaints
  m) phasing in the increased road use.

4. Water

Describe baseline conditions

- Describe existing surface and groundwater quality – an assessment needs to be undertaken for any water resource likely to be affected by the proposal and for all conditions (e.g. a wet weather sampling program is needed if runoff events may cause impacts).

  Note: Methods of sampling and analysis need to conform with an accepted standard (e.g. Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (DEC 2004) *or be approved and analyses undertaken by accredited laboratories).*

- Provide site drainage details and surface runoff yield.
- State the ambient Water Quality and River Flow Objectives for the receiving waters. These refer to the community's agreed environmental values and human uses endorsed by the Government as goals for the ambient waters. These environmental values are published on the website: http://www.environment.nsw.gov.au/ieo/index.htm. The EIS should state the environmental values listed for the catchment and waterway type relevant to your proposal. NB: A consolidated and approved list of environmental values are not available for groundwater resources. Where groundwater may be affected the EIS should identify appropriate groundwater environmental values and justify the choice.
- State the indicators and associated trigger values or criteria for the identified environmental values. This information should be sourced from the ANZECC 2000 *Guidelines for Fresh and Marine Water Quality* (http://www.environment.gov.au/water/publications/quality/nwqms-guidelines-4-vol1.html) (Note that, as at 2004, the NSW Water Quality Objectives booklets and website contain technical criteria derived from the 1992 version of the ANZECC Guidelines. The Water Quality Objectives remain as Government Policy, reflecting the community's environmental values and long-term goals, but the technical criteria are replaced by the more recent ANZECC 2000 Guidelines). NB: While specific guidelines for groundwater are not available, the ANCECC 2000 Guidelines endorse the application of the trigger values and decision trees as a tool to assess risk to environmental values in groundwater.
- State any locally specific objectives, criteria or targets, which have been endorsed by the government e.g. the Healthy Rivers Commission Inquiries or the NSW Salinity Strategy (DLWC, 2000) (http://www.environment.nsw.gov.au/salinity/government/nswstrategy.htm).
- Where site specific studies are proposed to revise the trigger values supporting the ambient Water Quality and River Flow Objectives, and the results are to be used for regulatory purposes (e.g. to assess whether a licensed discharge impacts on water quality objectives), then prior agreement from the EPA on the approach and study design must be obtained.
- Describe the state of the receiving waters and relate this to the relevant Water Quality and River Flow Objectives (i.e. are Water Quality and River Flow Objectives being achieved?). Proponents are generally only expected to source available data and information. However, proponents of large or high risk developments may be required to collect some ambient water quality / river flow / groundwater data to enable a suitable level of impact assessment. Issues to include in the description of the receiving waters could include:

  a) lake or estuary flushing characteristics

  b) specific human uses (e.g. exact location of drinking water offtake)

  c) sensitive ecosystems or species conservation values

  d) a description of the condition of the local catchment e.g. erosion levels, soils, vegetation cover, etc

e) an outline of baseline groundwater information, including, but not restricted to, depth to watertable, flow direction and gradient, groundwater quality, reliance on groundwater by surrounding users and by the environment

f) historic river flow data where available for the catchment.

Assess impacts

- No proposal should breach clause 120 of the *Protection of the Environment Operations Act* 1997 (i.e. pollution of waters is prohibited unless undertaken in accordance with relevant regulations).
- Identify and estimate the quantity of all pollutants that may be introduced into the water cycle by source and discharge point including residual discharges after mitigation measures are implemented.
- Include a rationale, along with relevant calculations, supporting the prediction of the discharges.
- Describe the effects and significance of any pollutant loads on the receiving environment. This should include impacts of residual discharges through modelling, monitoring or both, depending on the scale of the proposal. Determine changes to hydrology (including drainage patterns, surface runoff yield, flow regimes, wetland hydrologic regimes and groundwater).
- Describe water quality impacts resulting from changes to hydrologic flow regimes (such as nutrient enrichment or turbidity resulting from changes in frequency and magnitude of stream flow).
- Identify any potential impacts on quality or quantity of groundwater describing their source.
- Identify potential impacts associated with geomorphological activities with potential to increase surface water and sediment runoff or to reduce surface runoff and sediment transport. Also consider possible impacts such as bed lowering, bank lowering, instream siltation, floodplain erosion and floodplain siltation.
- Identify impacts associated with the disturbance of acid sulfate soils and potential acid sulfate soils.
- Containment of spills and leaks shall be in accordance with EPA's guidelines section 'Bunding and Spill Management' at http://www.epa.nsw.gov.au/mao/bundingspill.htm and the most recent versions of the Australian Standards referred to in the Guidelines. Containment should be designed for no-discharge.
- The significance of the impacts listed above should be predicted. When doing this it is important to predict the ambient water quality and river flow outcomes associated with the proposal and to demonstrate whether these are acceptable in terms of achieving protection of the Water Quality and River Flow Objectives. In particular the following questions should be answered:

  a) will the proposal protect Water Quality and River Flow Objectives where they are currently achieved in the ambient waters; and

  b) will the proposal contribute towards the achievement of Water Quality and River Flow Objectives over time, where they are not currently achieved in the ambient waters.

- Consult with the EPA as soon as possible if a mixing zone is proposed (a mixing zone could exist where effluent is discharged into a receiving water body, where the quality of the water being discharged does not immediately meet water quality objectives. The mixing zone could result in dilution, assimilation and decay of the effluent to allow water quality objectives to be met further downstream, at the edge of the mixing zone). The EPA will advise the proponent under what conditions a mixing zone will and will not be acceptable, as well as the information and modelling requirements for assessment.

  Note: The assessment of water quality impacts needs to be undertaken in a total catchment management context to provide a wide perspective on development impacts, in particular cumulative impacts.

- Where a licensed discharge is proposed, provide the rationale as to why it cannot be avoided through application of a reasonable level of performance, using available technology, management practice and industry guidelines.
- Where a licensed discharge is proposed, provide the rationale as to why it represents the best environmental outcome and what measures can be taken to reduce its environmental impact.
- Reference should be made to relevant guidelines including: *Managing Urban Stormwater: Soils and Construction* (Landcom, 2004), *Guidelines for Fresh and Marine Water Quality* ANZECC 2000), *Environmental Guidelines: Use of effluent by Irrigation* (DEC, 2004).

Describe management and mitigation measures

- Outline stormwater management to control pollutants at the source and contain them within the site. Also describe measures for maintaining and monitoring any stormwater controls.
- Outline erosion and sediment control measures directed at minimising disturbance of land, minimising water flow through the site and filtering, trapping or detaining sediment. Also include measures to maintain and monitor controls as well as rehabilitation strategies.
- Describe waste water treatment measures that are appropriate to the type and volume of waste water and are based on a hierarchy of avoiding generation of waste water; capturing all contaminated water (including stormwater) on the site; reusing/recycling waste water; and treating any unavoidable discharge from the site to meet specified water quality requirements.
- Outline pollution control measures relating to storage of materials, possibility of accidental spills (e.g. preparation of contingency plans), appropriate disposal methods, and generation of leachate.
- Describe hydrological impact mitigation measures including:
  a) site selection (avoiding sites prone to flooding and waterlogging, actively eroding or affected by deposition)
  b) minimising runoff
  c) minimising reductions or modifications to flow regimes
  d) avoiding modifications to groundwater.
- Describe groundwater impact mitigation measures including:
  a) site selection
  b) retention of native vegetation and revegetation
  c) artificial recharge
  d) providing surface storages with impervious linings
  e) monitoring program.
- Describe geomorphological impact mitigation measures including:
  a) site selection
  b) erosion and sediment controls
  c) minimising instream works
  d) treating existing accelerated erosion and deposition
  e) monitoring program.

- Any proposed monitoring should be undertaken in accordance with the *Approved Methods for the Sampling and Analysis of Water Pollutants in NSW* (DEC 2004).

5. Soils and contamination

Describe baseline conditions

- Provide any details (in addition to those provided in the location description - Section C) that are needed to describe the existing situation in terms of soil types and properties and soil contamination. Please refer to Attachment A for specific requirements regarding a baseline contamination assessment.

Assess impacts

- Identify any likely impacts resulting from the construction or operation of the proposal, including the likelihood of:
  a) disturbing any existing contaminated soil
  b) contamination of soil by operation of the activity
  c) subsidence or instability
  d) soil erosion
  e) disturbing acid sulfate or potential acid sulfate soils.
- Reference should be made to relevant guidelines including: *Contaminated Sites – Guidelines for Consultants Reporting on Contaminated Sites* (OEH, 2011); *Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997* (EPA, 2015).

Describe management and mitigation measures

- Describe and assess the effectiveness or adequacy of any soil management and mitigation measures during construction and operation of the proposal including:
  a) erosion and sediment control measures
  b) proposals for site remediation – see *Managing Land Contamination, Planning Guidelines SEPP 55 – Remediation of Land* (Department of Urban Affairs and Planning and Environment Protection Authority, 1998)
  c) proposals for the management of these soils – see *Acid Sulfate Soil Manual* (Acid Sulfate Soil Advisory Committee 1998) and *Acid Sulfate Soils Assessment Guidelines* (Acid Sulfate Soil Advisory Committee 1998).

6. Waste and chemicals

Describe baseline conditions

- Describe any existing waste or chemicals operations related to the proposal.

Assess impacts

- Assess the adequacy of proposed measures to minimise natural resource consumption and minimise impacts from the handling, transporting, storage, processing and reprocessing of waste and/or chemicals.
- Reference should be made to: the EPA's *Waste Classification Guidelines 2014 (as in force from time to time)*
- If the proposal is an energy from waste facility it must:
  - demonstrate that the proposed operation will comply with the NSW EPA's Energy from Waste Policy Statement;
  - describe of the classes and quantities of waste that would be thermally treated at the facility;
  - demonstrate that waste used as a feedstock in the waste to energy plant would be the residual from a resource recovery process that maximises the recovery of material;
  - detail procedures that would be implemented to control the inputs to the waste to energy plant, including contingency measures that would be implemented if inappropriate materials are identified;
  - detail the location and size of stockpiles of unprocessed and processed recycled waste at the site;
  - demonstrate any waste material (e.g. biochar, ash) produced from the waste to energy facility for land application is fit-for-purpose and poses minimal risk of harm to the environment in order to meet the requirements for consideration of a resource recovery order and /or exemption by the EPA;
  - detail procedures for the management of other solid, liquid and gaseous waste streams;
  - describe how waste would be treated, stored, used, disposed and handled on site, and transported to and from the site, and the potential impacts associated with these issues, including current and future offsite waste disposal methods; and
  - identify the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the *NSW Waste Avoidance and Resource Recovery Strategy 2014-21*.

Describe management and mitigation measures

- Outline measures to minimise the consumption of natural resources.
- Outline measures to avoid the generation of waste and promote the re-use and recycling and reprocessing of any waste.
- Outline measures to support any approved regional or industry waste plans.

7. 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.
- Assess the impact of the proposal against the long term air, noise and water quality objectives for the area or region.

- Identify infrastructure requirements flowing from the proposal (e.g. water and sewerage services, transport infrastructure upgrades).
- Assess likely impacts from such additional infrastructure and measures reasonably available to the proponent to contain such requirements or mitigate their impacts (e.g. travel demand management strategies).

F. List of approvals and licences

- Identify all approvals and licences required under environment protection legislation including details of all scheduled activities, types of ancillary activities and types of discharges (to air, land, water).

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).
- The mitigation strategy should include the environmental management and cleaner production principles which would be followed when planning, designing, establishing and operating the proposal. It should include two sections, one setting out the program for managing the proposal and the other outlining the monitoring program with a feedback loop to the management program.

H. Justification for the Proposal

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

ATTACHMENT B: GUIDANCE MATERIAL

Title	Web address
Relevant Legislation	
Contaminated Land Management Act 1997	http://www.legislation.nsw.gov.au/#/view/act/1997/140
Environmentally Hazardous Chemicals Act 1985	http://www.legislation.nsw.gov.au/#/view/act/1985/14
Environmental Planning and Assessment Act 1979	http://www.legislation.nsw.gov.au/#/view/act/1979/203
Protection of the Environment Operations Act 1997	http://www.legislation.nsw.gov.au/#/view/act/1997/156
Water Management Act 2000	http://www.legislation.nsw.gov.au/#/view/act/2000/92
Licensing	
Guide to Licensing	www.epa.nsw.gov.au/licensing/licenceguide.htm
Air Issues	
Air Quality	
Approved methods for modelling and assessment of air pollutants in NSW (2016)	http://www.epa.nsw.gov.au/air/appmethods.htm
POEO (Clean Air) Regulation 2010	http://www.legislation.nsw.gov.au/#/view/regulation/2010/428
Noise and Vibration	
NSW Noise Policy for Industry	http://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-(2017)
Interim Construction Noise Guideline (DECC, 2009)	http://www.epa.nsw.gov.au/noise/constructnoise.htm
Assessing Vibration: a technical guideline (DEC, 2006)	http://www.epa.nsw.gov.au/noise/vibrationguide.htm
NSW Road Noise Policy (DECCW, 2011)	http://www.epa.nsw.gov.au/your-environment/noise/transport-noise
NSW Rail Infrastructure Noise Guideline (EPA, 2013)	http://www.epa.nsw.gov.au/your-environment/noise/transport-noise
Human Health Risk Assessment	

Environmental Health Risk Assessment: Guidelines for assessing human health risks from environmental hazards (enHealth, 2012)	http://www.eh.org.au/documents/item/916
Waste, Chemicals and Hazardous Materials and Radiation	
Waste	
Environmental Guidelines: Solid Waste Landfills (EPA, 2016)	http://www.epa.nsw.gov.au/waste/landfill-sites.htm
Draft Environmental Guidelines - Industrial Waste Landfilling (April 1998)	http://www.epa.nsw.gov.au/resources/waste/envguidlns/industrialfill.pdf
EPA's Waste Classification Guidelines 2014	http://www.epa.nsw.gov.au/wasteregulation/classify-guidelines.htm
Resource recovery orders and exemptions	http://www.epa.nsw.gov.au/wasteregulation/orders-exemptions.htm
European Unions Waste Incineration Directive 2000	http://ec.europa.eu/environment/archives/air/stationary/wid/legislation.htm
EPA's Energy from Waste Policy Statement	http://www.epa.nsw.gov.au/wastestrategy/energy-from-waste.htm
NSW Waste Avoidance and Resource Recovery Strategy 2014-2021	http://www.epa.nsw.gov.au/wastestrategy/warr.htm
Chemicals subject to Chemical Control Orders	
Chemical Control Orders (regulated through the EHC Act)	http://www.epa.nsw.gov.au/pesticides/CCOs.htm
National Protocol - Approval/Licensing of Trials of Technologies for the Treatment/Disposal of Schedule X Wastes - July 1994	Available in libraries
National Protocol for Approval/Licensing of Commercial Scale Facilities for the Treatment/Disposal of Schedule X Wastes - July 1994	Available in libraries
Water and Soils	
Acid sulphate soils	
Coastal acid sulfate soils guidance material	http://www.environment.nsw.gov.au/acidsulfatesoil/ and http://www.epa.nsw.gov.au/mao/acidsulfatesoils.htm
Acid Sulfate Soils Planning Maps	http://www.environment.nsw.gov.au/acidsulfatesoil/riskmaps.htm
Contaminated Sites Assessment and Remediation	
Managing land contamination: Planning Guidelines – SEPP 55 Remediation of Land	http://www.epa.nsw.gov.au/clm/planning.htm

Guidelines for Consultants Reporting on Contaminated Sites (EPA, 2000)	http://www.epa.nsw.gov.au/resources/clm/20110650consultantsglines.pdf
Guidelines for the NSW Site Auditor Scheme - 2nd edition (DEC, 2006)	http://www.epa.nsw.gov.au/resources/clm/auditorglines06121.pdf
Sampling Design Guidelines (EPA, 1995)	http://www.epa.nsw.gov.au/resources/clm/95059sampgdlne.pdf
National Environment Protection (Assessment of Site Contamination) Measure 1999 (or update)	http://www.scew.gov.au/nepms/assessment-site-contamination
Soils – general	
Managing land and soil	http://www.environment.nsw.gov.au/soils/landandsoil.htm
Managing urban stormwater for the protection of soils	http://www.environment.nsw.gov.au/stormwater/publications.htm
Landslide risk management guidelines	http://australiangeomechanics.org/admin/wp-content/uploads/2010/11/LRM2000-Concepts.pdf
Site Investigations for Urban Salinity (DLWC, 2002)	http://www.environment.nsw.gov.au/resources/salinity/booklet3siteinvestigationsforurbansalinity.pdf
Local Government Salinity Initiative Booklets	http://www.environment.nsw.gov.au/salinity/solutions/urban.htm
Water	
Water Quality Objectives	http://www.environment.nsw.gov.au/ieo/index.htm
ANZECC (2000) Guidelines for Fresh and Marine Water Quality	http://www.environment.gov.au/water/publications/quality/nwqms-guidelines-4-vol1.html
Applying Goals for Ambient Water Quality Guidance for Operations Officers - Mixing Zones	Contact the EPA on 131555
Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)	http://www.environment.nsw.gov.au/resources/legislation/approvedmethods-water.pdf

NSW GOVERNMENT | Office of Environment & Heritage

DOC18/948731
SSD 9540

Shaun Williams
Planning Officer, Industry Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Williams

Secretary's Environmental Assessment Requirements – Girraween Waste Recycling Transfer Facility - 224-232 Toongabbie Road, Girraween - SSD 9540

I refer to your email of 28 November 2018 requesting comments from the Office of Environment and Heritage (OEH) on the above State Significant Development project.

OEH has reviewed the relevant information and provides recommendations in Attachment A.

Please note that a separate response may be provided on heritage matters by the Heritage Division of OEH as delegate of the Heritage Council of NSW.

Should you have any queries regarding this matter, please contact Marnie Stewart on 9995 6868 or marnie.stewart@environment.nsw.gov.au

Yours sincerely

S. Harrison 13/12/18

SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney
Communities and Greater Sydney

PO Box 644 Parramatta NSW 2124
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Attachment A – OEH Environmental Assessment Requirements

Biodiversity

1. Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the *Biodiversity Conservation Act 2017* using the Biodiversity Assessment Method and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the *Biodiversity Conservation Act 2016* (s6.12), *Biodiversity Conservation Regulation 2017* (s6.8) and Biodiversity Assessment Method, unless OEH and DPE determine that the proposed development is not likely to have any significant impacts on biodiversity values.
2. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the Biodiversity Assessment Method.
3. The BDAR must include details of the measures proposed to address the offset obligation as follows;
   - The total number and classes of biodiversity credits required to be retired for the development/project;
   - The number and classes of like-for-like biodiversity credits proposed to be retired;
   - The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules;
   - Any proposal to fund a biodiversity conservation action;
   - Any proposal to conduct ecological rehabilitation (if a mining project);
   - Any proposal to make a payment to the Biodiversity Conservation Fund.

   If seeking approval to use the variation rules, the BDAR must contain details of the reasonable steps that have been taken to obtain requisite like-for-like biodiversity credits.
4. The BDAR must be submitted with all spatial data associated with the survey and assessment as per Appendix 10 of the BAM.
5. The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under s6.10 of the *Biodiversity Conservation Act 2016*.

Aboriginal cultural heritage

6. The EIS must identify and describe the Aboriginal cultural heritage values that exist across the whole area that will be affected by the development and document these in an Aboriginal Cultural Heritage Assessment Report (ACHAR). This may include the need for surface survey and test excavation. The identification of cultural heritage values must be conducted in accordance with the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (DECC 2010), and guided by the *Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011).

7. Consultation with Aboriginal people must be undertaken and documented in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the ACHAR.
8. Impacts on Aboriginal cultural heritage values are to be assessed and documented in the ACHAR. The ACHAR must demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the ACHAR must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must be documented and notified to OEH.
9. The ACHAR must outline procedures to be followed if Aboriginal objects are found at any stage of the life of the development to formulate appropriate measures to manage unforeseen impacts.

Note that a due diligence report is not acceptable, an ACHAR must be prepared.

Flooding and coastal hazards

10. The EIS must map the following features relevant to flooding as described in the Floodplain Development Manual 2005 (NSW Government 2005) including:
    a. Flood prone land.
    b. Flood planning area, the area below the flood planning level.
    c. Hydraulic categorisation (floodways and flood storage areas).
    d. Flood hazard
11. The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 5% Annual Exceedance Probability (AEP), 1% AEP, flood levels and the probable maximum flood, or an equivalent extreme event.
12. The EIS must model the effect of the proposed development (including fill) on the current flood behaviour for a range of design events as identified in 14 above. This includes the 0.5% and 0.2% AEP year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.
13. Modelling in the EIS must consider and document:
14. Existing council flood studies in the area and examine consistency to the flood behaviour documented in these studies.
15. The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood, or an equivalent extreme flood.
16. Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazard categories and hydraulic categories.
17. Relevant provisions of the NSW Floodplain Development Manual 2005.
18. The EIS must assess the impacts on the proposed development on flood behaviour, including:
    a. Whether there will be detrimental increases in the potential flood affectation of other properties, assets and infrastructure.
    b. Consistency with Council floodplain risk management plans.
    c. Consistency with any Rural Floodplain Management Plans.
    d. Compatibility with the flood hazard of the land.
    e. Compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land.

f. Whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site.
g. Whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.
h. Any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the NSW SES and Council.
i. Whether the proposal incorporates specific measures to manage risk to life from flood. These matters are to be discussed with the NSW SES and Council.
j. Emergency management, evacuation and access, and contingency measures for the development considering the full range or flood risk (based upon the probable maximum flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the NSW SES.
k. Any impacts the development may have on the social and economic costs to the community as consequence of flooding.

(END OF SUBMISSION)

7 December 2018

Our Ref: SYD18/01877
DP&E Ref: SSD 9540

The Executive Director
Key Sites and Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Shaun Williams

Dear Sir/Madam,

REQUEST FOR SEARS
CONSTRUCTION OF A NEW WASTE AND RECYCLING TRANSFER FACILITY
224-232 TOONGABBIE ROAD, GIRRAWEEN

Reference is made to your correspondence dated 28 November 2018, 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).

Transport for NSW (TfNSW) will provide a separate submission.

Roads and Maritime has reviewed the submitted Preliminary Environmental Assessment and request the following issues to be addressed as part of the traffic and transport impact assessment of the proposed development:

1. Daily and peak traffic movements likely to be generated by the proposed development including the impact on surrounding road network intersections and the need/associated funding for upgrading or road improvement works (if required). The key intersections to be examined/modelled include:

    - Great Western Highway / Toongabbie Road

2. Details of the proposed site access and parking provisions associated with the proposed development including compliance with the requirements of the relevant Australian Standards (i.e. turn paths, sight distance requirements, aisle widths, etc).

3. Detailing vehicle circulation, proposed number of car parking spaces and compliance with the appropriate parking codes.

4. Details of the light and heavy vehicle movements (including vehicle type and likely arrival and departure times), including service vehicle movements.

5. An assessment of the accessibility of the development by public and active transport.

If you have any further inquiries in relation to this development application please contact Narelle Gonzales, Development Assessment Officer on 0409 541 879 or by email at: development.sydney@rms.nsw.gov.au.

Yours sincerely,

Brendan Pegg
Senior Land Use Planner
South East Precinct, Sydney Division

Department of Industry

OUT18/18862

Shaun Williams
Planning Officer
Industry Assessments
NSW Department of Planning and Environment

shaun.williams@planning.nsw.gov.au

Dear Mr Williams

Girraween Waste Recycling Transfer Facility (9540)
Comment on the Secretary's Environmental Assessment Requirements (SEARs)

I refer to your email of 28 November 2018 to the Department of Industry (DoI) in respect to the above matter. Comment has been sought from relevant branches of Lands & Water and Department of Primary Industries (DPI), and the following requirements for the proposal are provided:

DoI -– Water and Natural Resources Access Regulator

- The identification of an adequate and secure water supply for the life of the project. This includes confirmation that water can be sourced from an appropriately authorised and reliable supply. This is also to include an assessment of the current market depth where water entitlement is required to be purchased.
- A detailed and consolidated site water balance.
- 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, and groundwater dependent ecosystems, and measures proposed to reduce and mitigate these impacts.
- Proposed surface and groundwater monitoring activities and methodologies.
- Consideration of relevant legislation, policies and guidelines, including the NSW Aquifer Interference Policy (2012), the Guidelines for Controlled Activities on Waterfront Land (2018) and the relevant Water Sharing Plans (available at https://www.industry.nsw.gov.au/water).

Any further referrals to Department of Industry can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

Yours sincerely

Simon Francis
Senior Policy Officer, Assessment Advice
Lands and Water - Strategy and Policy
12 December 2018

Mr. Shaun Williams
Planning Officer
Industry Assessments
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr. Williams

Request for Secretary's Environmental Assessment Requirements (SEARs) – SSD 9540 Girraween Waste Recycling Transfer Facility, 224-232 Toongabbie Road, Girraween

Thank you for your email dated 28 November 2018 requesting Transport for NSW to provide input to the Secretary's Environmental Assessment Requirements (SEARs) for the above State Significant Development (SSD) application.

TfNSW advises that the following should be addressed within the Environmental Impact Statement (EIS):

- a quantitative Traffic Impact Assessment which details all daily and peak traffic and transport movements likely to be generated (light and heavy vehicle, public transport, pedestrian and cycle trips) during construction and operation of the development;
- details of the current daily and peak hour vehicle, public transport, pedestrian and bicycle movements and existing traffic and transport facilities provided on the road network located adjacent to the proposed development;
- an assessment of the operation of existing and future transport networks including public transport, pedestrian and bicycle provisions and their ability to accommodate the forecast number of trips to and from the development;
- details the type of heavy vehicles likely to be used (e.g. B-doubles) during the operation of the development and the impacts of heavy vehicles on nearby intersections;
- details of access to, from and within the site from the road network including intersection location, design and sight distance (i.e. turning lanes, swept paths, sight distance requirements);
- an assessment of the existing and future performance of key intersections providing access to the site;
- plans of any road upgrades or new roads required for the development, if necessary;
- demonstrate the measures to be implemented to encourage employees of the development to make sustainable travel choices, including walking, cycling, public transport and car sharing;
- appropriate provision, design and location of on-site bicycle parking;
- details of the proposed number of car parking spaces and compliance with appropriate parking codes and justify the level of car parking provided on the site;

- Preparation of a draft Construction Traffic Management Plan which includes:
  - details of vehicle routes, number of trucks, hours of operation, access management and traffic control measures for all stages of construction;
  - assessment of cumulative impacts associated with other construction activities;
  - an assessment of road safety at key intersections;
  - details of anticipated peak hour and daily truck movements to and from the site;
  - details of access arrangements for workers to/from the site, emergency vehicles and service vehicle movements;
  - details of temporary cycling and pedestrian access during constructions;
  - an assessment of traffic and transport impacts during construction and how these impacts will be mitigated for any associated traffic, pedestrians, cyclists and public transport operations.

If you require further information regarding the above, please don't hesitate to contact Ken Ho, Transport Planner, via email at ken.ho@transport.nsw.gov.au.

Yours sincerely

10/12/2018

Mark Ozinga
Principal Manager, Land Use Planning & Development
Freight, Strategy & Planning

CD18/11069

From:	Fire Safety
To:	Shaun Williams
Subject:	FRNSW Response to SEARs - Girraween Waste Recycling Transfer Facility (SSD 9540)
Date:	Wednesday, 19 December 2018 10:12:57 AM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png image007.png image008.png

Dear Shaun,

Secretary's Environmental Assessment Requirements (SEARs)
Girraween Waste Recycling Transfer Facility (SSD 9540)
224-232 Toongabbie Road, Girraween (Cumberland LGA)

Thank you for your submission for the above development to Fire + Rescue NSW (FRNSW) for review and comment.

It is understood that Benedict Recycling Pty Ltd (the proponent) is proposing to develop a new waste and recycling transfer facility with capability to process up to 220,000 tonnes per annum of co-mingled and segregated pre-classified general solid waste (non-putrescible). FRNSW submit the following general comments and recommendations for consideration:

- It is understood that the proponent is proposing to include a number of fire safety measures as part of the development. It is recommended that the proponent engage a BCA consultant to assess the development's fire safety requirements in accordance with the National Construction Code.
- It is understood that a SEPP 33 assessment will be undertaken as part of the development of the Environmental Impact Statement (EIS).
- That consideration be given to FRNSW's Fire safety guideline - Fire safety in waste facilities. https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_fire_safety_in_waste_facilities.pdf
- That consideration be given to the containment of contaminated firefighting water.
- Whilst there is currently no requirement for a Fire Safety Study (FSS), one may be requested at the discretion of FRNSW following the provision of more detailed information relating to the development's fire safety measures.
- It is requested that FRNSW be consulted during the design of the development's fire safety measures.
- It is requested that a Fire Engineering Brief Questionnaire (FEBQ) be prepared in relation to the development and submitted to FRNSW for review.
- It is recommended that a comprehensive Emergency Response Plan (ERP) be developed for the site.

If you have any queries regarding the above please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS18/3176. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au..

Kind Regards,

Fire Safety Branch will be closed from 12:00pm 21st December 2018 and will re-open on the 2nd January 2019.

As operational staff will be available during our shut down period, inspections may still be conducted.

Fire Safety Branch would like to thank all our stakeholders for their continued support throughout 2018 and to wish you all a very Merry Christmas and a safe and prosperous 2019.

Administration Officer

Fire Safety Administration Unit
Community Safety Directorate | Fire and Rescue NSW
T: (02) 9742 7434
1 Amarina Ave, Greenacre, NSW 2190 | Locked Bag 12, Greenacre, NSW 2190

PREPARED FOR ANYTHING.

www.fire.nsw.gov.au

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e-mail: records@rfs.nsw.gov.au

Headquarters
Locked Bag 17
Granville NSW 2142

Facsimile: 8741 5433

The Secretary
Department of Planning and Environment (Sydney Offices)
GPO Box 39
Sydney NSW 2001

Your Ref: SSD 9540
Our Ref: D18/8346
DA18113016387 AP

ATTENTION: Shaun Williams

11 December 2018

Dear Mr Williams

Part 3A/State Significant Development Application - 678//9157 - 224-232 Toongabbie Road Girraween 2145

I refer to your correspondence dated 28 November 2018 seeking key issue and assessment requirements regarding bush fire protection for the above Part 3A/State Significant Development Application in accordance with section 75F (4) of the 'Environmental Planning and Assessment Act 1979'.

The New South Wales Rural Fire Service (NSW RFS) has considered the information submitted and has no specific recommendations in relation to bush fire protection.

Should you wish to discuss this matter please contact Alastair Patton on 1300 NSW RFS.

Yours sincerely

Nika Fomin
Manager, Planning and Environment Services

For general information on bush fire protection please visit www.rfs.nsw.gov.au