

Your Ref: DA136/2015 Our Ref: 15044 Contact: Garry Salvestro

12 May 2016

The General Manager Gundagal Shire Council PO Box 34 Gundagal NSW 2722

ATTN: Mr Brent Livermore

Dear Sir,

RE: PROPOSED EXTENSION TO EXISTING WASTE MANAGEMENT FACILITY - 303 BURRA ROAD, GUNDAGAI - ADDITIONAL INFORMATION - ADDENDUM 2

I refer to Council's letter of 18 April 2016 requesting further information to assist in the assessment of the subject DA.

Please find attached document titled *Addendum 2 to Environmental Impact Statement* that addresses the information requests made by Council. This will be included with Part C to the EIS document submitted with the development application and is to be read in conjunction with Parts A and B.

Note the Air Quality/Noise/Greenhouse Gas impacts will be addressed in subsequent Addendum 3, as a response to EPA's letter of 27/4/16.

Also the additional A1 plans requested have been delivered to Council separately on 11/5/16.

If you require and further clarification, please don't hesitate to contact our office on (02) 69 218 588.

Yours sincerely,

Garry Salvestro Director Salvestro Planning



Environmental Impact Statement

Proposed Extension to Existing Waste Management Facility (Class 2 Solid Landfill)

303 Burra Road, Gundagai



Prepared for MH Earthmoving Pty Ltd December 2015 (Revised May 2016)

Part C – EIS Addendums

Addendum 2 to Environmental Impact Statement

Proposed Extension to Existing Waste Management Facility (Class 2 Solid Landfill)

303 Burra Road, Gundagai

Prepared for MH Earthmoving Pty Ltd May 2016

Response to Additional Information Request – DA136/2015 – GSC 18/4/16

1 INTRODUCTION

The following addendum document is in response to additional information request issued by Council on the 18 April 2016. It is to be read in conjunction with:

- Environmental Impact Statement and Attachments (Parts A & B), as originally lodged with Gundagai Shire Council (GSC) on 21 December 2015; and
- EIS Part C Addendum 1 lodged with GSC on 1 April 2016; and

It is noted that Council's information request in relation to air quality/noise assessment/greenhouse gas impacts will be addressed in subsequent Addendum 3, as a response to the more information request from EPA dated 27/4/16. The request for A1 site plan/construction plans has been satisfied with the separate lodgement of those plans with Council. Consequently, the topics covered in this addendum relate to only alternative sites discussion and sourcing of clay and other materials.

2 ALTERNATIVE SITES

The additional information provided below is to be read in conjunction with Section 3.3 of the EIS Part A document and Addendum 1.

Clause 7(1)(c) of Schedule 2 of the Regulations states that an EIS must include:

• "an analysis of any feasible alternatives to the carrying out of the development, activity or infrastructure, having regard to its objectives, including the consequences of not carrying out the development, activity or infrastructure,"

As previously noted, the suggestion of alternative sites was also considered. The applicant's consideration of alternatives included:

- 1. Do Nothing this was rejected as VISY must dispose of the by-product waste stream as solid waste. Reuse of the by-product as a soil amendment product was ceased due to changes in legislation that now prohibits that activity. The applicant has an existing contract to find a suitable site for the disposal of the subject waste product. The consequences of not carrying out the development include the necessity for VISY to find alternative waste disposal sites outside of the local/regional area that would potential be unviable and, in turn, potentially threaten the ongoing operation of the plant. The economic implications for the local region would be significant and unacceptable. In addition, the consequences for the applicant would be the loss of a significant contract and potential closure of a local business with flow on effects of job loss and impact on the economic and social well-being of those persons directly and indirectly involved.
- 2. Develop a disused quarry at Cootamundra this was rejected as the site has significant issues with groundwater. Major infrastructure would be required to be installed to make the site operational, including establishing suitable access arrangements and connection to essential services.

- 3. Develop a disused quarry at Coolac this site was also rejected as the site has similar issues with groundwater. Major infrastructure would also be required to the installed to make the site operational, including establishing suitable access arrangements and connection to essential services.
- 4. Access to and expansion of Bellettes Landfill, Tumut this alternative was rejected due to the limitations of the existing acceptance of waste (3000tpa) and restrictions to enabling expansion to the existing operation.
- 5. Access to and expansion of Bald Hill Landfill, Jugiong this alternative was rejected due to the limitations of the existing acceptance of waste (15000tpa) and restrictions to enabling expansion to the existing operation.
- 6. Access to Woodlawn Landfill, Tarago this alternative was rejected due to access restrictions by rail only and potential excessive costs in establishing an efficient and cost effective waste transfer system from source to landfill.
- 7. Expansion of existing Burra Road Landfill site, Gundagai this alternative provided the best opportunities to establish a sustainable landfill operation to meet the projected needs of both VISY and the applicant (see attached letter of support from VISY). The opportunities offered by the current site, particularly in terms of current infrastructure investment, established environmental monitoring facilities and natural features of site far outweigh the attributes of any other alternative site.

The final site selection process undertaken by the applicant is summarised in the following table:

Assessment Criteria			Alter	native O	ption		
	1	2	3	4	5	6	7
1 ability to satisfy project objectives	N/A	1	1	1	1	0	3
2 acceptability of environmental impacts	N/A	0	0	2	2	3	2
3 acceptability of any environmental risks/uncertainties	N/A	2	2	2	2	2	2
4 ability to handle abnormal events (natural/accidental)	N/A	2	2	2	2	2	2
5 efficiency to meet present demand	N/A	1	1	0	1	2	3
6 flexibility to meet future demand	N/A	1	1	0	1	2	3
7 opportunity to maximise recycling/reuse of wastes	N/A	1	1	1	1	2	2
8 efficient use of land & natural resources	N/A	1	1	2	2	2	3
9 relative environmental, economic and social costs	N/A	0	0	1	1	1	2
10 proximity to source	N/A	1	1	2	2	0	2
11 access to suitable road network	N/A	1	1	2	2	0	2
12 availability of essential/operational services	N/A	0	0	1	2	2	3
Criteria Score Total	N/A	11	11	16	19	18	29

Table 1: Consideration of Alternative Options

Ref: N/A = Not Applicable 0 = Unacceptable 1 = Poor 2 = Good 3 = Excellent

3 CLAY LINER SOURCE DETAILS

The information in this section expands on information contained in Section 3.4.2 of the EIS Part A document and Addendum 1.

A noted previously, approximately 58,000m³ of clay (or approximately 62,700 tonnes) will be required for clay liner construction for the landfill development as proposed. Approximately 10% of the clay will be sourced onsite with the balance to be sourced from appropriately licensed pits and will have permeability characteristics consistent with EPA requirements.

Testing for permeability will be undertaken prior to acceptance on site in accordance with current practice (see attached test results for clay currently utilised by the existing landfill operation). Clay will not be accepted unless it satisfies EPA's requirements as per specification contained in EPA Guide to Solid Waste Landfill 2015 (*insitu hydraulic conductivity of less than 1 x 10–9 m/s. The clay should contain no rock or soil clumps greater than 50 mm in any dimension*).

As indicated above, 90% of required clay (approximately 52,200m³) will be sourced off site. This equates to approximately 3,480m³ per year over the expected life of the landfill site. The current viable and legitimate sources include:

1. Bethungra Road, Nangus: The clay from this source has been tested during the current operation of the landfill (see results attached) and meets the required hydraulic conductivity EPA standard. For the purposes of supplying the proposed subject expanded landfill operation, the applicant is preparing a development application for approval of GSC and subsequent licencing of EPA, to be completed prior to operation commencing. The expected transport route to be taken by heavy vehicle haulage of the clay product will involve Burra Road, Punch Street, West Street, Nangus Road and Bethungra Road.



Figure 1: Transport Route – Bethungra Road to Burra Road

2. Tumblong Reserve Road, Bangus: This is a Council controlled and licenced gravel pit with clay materials available as indicated by Council (see attached correspondence from Gundagai Shire Council). Council has also offered other pits under its control for the supply of suitably tested clay for the subject landfill. Subject to finalised agreements and testing, the expected transport route to be taken by heavy vehicle haulage of the clay product will involve, Burra Road, Punch Street, West Street, Hume Highway, Old Hume Highway (Mundarlo Road) and Tumblong Reserve Road.



Figure 2: Transport Route – Tumblong Reserve Road to Burra Road

Addendum 2 - Additional Information – Extension to Existing Waste Management Facility – DA136/2015

3. Glenella Quarry, Cowra: This is an approved and licenced quarry that supplies high quality clay for civil operations including landfills. Preliminary negotiations have been made for the supply of clay material to the subject site, including confirmation of quantities available and quality to meet EPA standards as specified above. Subject to finalised agreements and testing, if this alternative source is used, the expected transport route to be taken by heavy vehicle haulage of the clay product will involve, Burra Road, Punch Street, West Street, Hume Highway Nth, Lachlan Valley Way, Morongla Road, Reids Flat Road and Battery Road.



Figure 3: Transport Route – Glenella Quarry to Burra Road

The above three alternatives provide a legitimate response to the issue of clay sources for the proposed expanded landfill operation.

Part C – EIS Addendum 2 Attachments

List of Attachments:

- ATTACHMENT 1: VISY LETTER OF SUPPORT 31/08/2015
- ATTACHMENT 2: DMM CLAY TEST RESULTS 21/09/2015
- ATTACHMENT 3: GUNDAGAI SHIRE EMAIL RE SOURCE OF CLAY FROM EXISTING PITS 29/04/2016

ATTACHMENT 1: VISY LETTER OF SUPPORT – 31/08/2015



1302 Snowy Mountains Highway, Tumut, NSW 2720 Australia Phone +61 2 6947 7900 Facsimile +61 2 6947 5315 Visy Paper Pty Ltd ACN 005 803 234 ABN 49 984 541 896 Visy Pulp and Paper Pty Ltd ABN 30 086 513 144

www.visy.com.au

31 August 2015

To Whom It May Concern,

Re: Burra Road Landfill Development

We are writing to you in regards to our full support for any future expansion at the Burra Road Landfill site. Since 2013 Visy has been sending process waste (Class 2 Solid Waste) to the NSW EPA Licensed landfill.

Visy Pulp and Paper, Tumut and MH Earthmoving Pty Ltd have established a strong working relationship during this period, which has seen the efficient removal and disposal of Visy's waste in accordance with the conditions set out in Environment Protection Licence number 20297.

MH Earthmoving Pty Ltd has always provided impeccable service and reliability in regard to the contract held with Visy. Collections have been as required five days per week to avoid the build up of stockpiled waste at the Visy site.

Waste is delivered during operational hours to the immaculately presented Burra Road Landfill site, which is a credit to MH Earthmoving Pty Ltd who has continued to maintain this high quality presentation over the past two years of operation.

Visy would like to build on the current well established relationship with MH Earthmoving Pty Ltd and continue into the future. The Burra Road Landfill site completely supports Visy's landfill requirements and is also more environmentally sustainable and cost effective than alternate landfills with much greater haulage distances.

Should you have any questions please do not hesitate to contact me on 02 6947 7900.

Yours sincerely

Jean Yves Nouaze General Manager Visy Pulp and Paper, Tumut

Matt O'Donovan Environmental Manager Visy Pulp and Paper, Tumut

ATTACHMENT 2: DMM CLAY TEST RESULTS – 21/09/2015

CHAIN-OF-CUSTO	λ								Page 1 of 1
Senders Details	DM McMahon Pty Ltd			Мас	quarie Geot	technical Job No.	Receivable Details		Macquarie Geotechnical
Address:	4A Norton Street, Wagga NSW 2650	Wagga			(Quote on all c	correspondence)	Address:		3 Watt Drive, Bathurst NSW 2795
hone Number:	02 6931 0510					MM	Phone Number:		32 6332 2011
:mail:	admin@dmmcmahon.com.au	п					Email:		omorris@macgeo.com.au
Contact Name:	David McMahon						Contact Name:		Brad Morris
Date Sampled Time	Sample I.D	Container Size	Sample Location	Medium *	No. of Containers		Testing		Remarks
19/9/2015 am	3434 - Nangus	2.7kg	Stockpile	s	1	AS1289 6.7.2 Determination of perm	eability of a soil – Falling head method for a specimen	remoulded	MDD & OMC tba
Relinquished by:		Date:				MG Contact: David I	McMahon Phone: 02 6332 2011	Ema	il: bmorris@macgeo.com.au
MACQUARIE GEOŢECH	Macquarie Geotechnical 3 Watt Drive PO Box 71 BATHURST NSW 2795 Phone: 02 6332 2011 Fax: 02 6334 4213			Commen	<u>3</u>			* Legend:	S = Soil, W = Water, F = Filter T = Tube, C = Concrete R = Rock

						1			
DM McMa	hon Pty Ltd							PAGE:	1
PO Box 61	18							OF:	1
WAGGAW	AGGA NSW 2	2650		AcMah	on		SUI	BMITTED BY:	DM
Ph: 0269 3	10 510 Fax: (0269 310 511	E	ARTH SCIEI	NCE		DATE	SUBMITTED:	21/09/15
		TEST REPO	RT				NO C	OF SAMPLES:	1
	PAN	/EMENT MATERIALS, FILLS,	SUBGRADE A	ND SOILS		_	SAMPLIN	IG METHOD:	client
	CLIENT	F: Martin Hay Earthmoving						CLAUSE	*
JOB [DESCRIPTION	I: Nangus Clay: Permeability	/ Testing				SPEC	CIFICATIONS	*
							PREPARATIO	N METHOD:	T105
MATE	RIAL SOURCE	: Stockpile							
PR	OPOSED USE	: Earthworks Material					JOB NO.:	3434	
MA	ATERIAL TYPE	: Yellowish Clay							
			SAN	1PLE NUMBER:	1	*	*	*	*
			SITE OR	CHAINAGE (m):	*	*	*	*	*
		DEPTHS BETWEEN V	VHICH SAMP	LES TAKEN (m):	*	*	*	*	*
	SPECIFIED	LIMITS LISTED BELOW FOR:	*	*	*	*	*	*	*
TESTS		PRETREATMENT:	*	*	*	*	*	*	*
T106		PASS 75.0mm SIEVE %	*	*	*	*	*	*	*
		PASS 53.0mm SIEVE %	*	*	*	*	*	*	*
		PASS 37.5mm SIEVE %	*	*	*	*	*	*	*
		PASS 26.5mm SIEVE %	*	*	*	*	*	*	*
		PASS 19.0mm SIEVE %	*	*	*	*	*	*	*
		PASS 13.2mm SIEVE %	*	*	*	*	*	*	*
		PASS 9.50mm SIEVE %	*	*	*	*	*	*	*
		PASS 6.70mm SIEVE %	*	*	*	*	*	*	*
		PASS 4.75mm SIEVE %	*	*	*	*	*	*	*
		PASS 2.36mm SIEVE %	*	*	*	*	*	*	*
T107	WHOLE	PASS 425µm SIEVE %	*	*	*	*	*	*	*
	SAMPLE	PASS 75µm SIEVE %	*	*	*	*	*	*	*
		LESS THEN 13.5um %	*	*	*	*	*	*	*
T107	-2.36mm	PASS 425um SIEVE %	*	*	*	*	*	*	*
		PASS 75um SIEVE %	*	*	*	*	*	*	*
		LESS THEN 13.5um %	*	*	*	*	*	*	*
		OBSERVATIONS	*	*	*	*	*	*	*
RATIOS	Α-	PASS 425um %	*	*	*	*	*	*	*
10 1100	R -	PASS 75/425 µm %	*	*	*	*	*	*	*
	C -	BFLOW 13 5/75um	*	*	*	*	*	*	*
Δ51289 3 1 2	<u> </u>		*	*	*	*	*	*	*
AS1289 3 2 1		PLASTIC LIMIT %	*	*	*	*	*	*	*
AS1289 3 3 1		PLASTICITY INDEX %	*	*	*	*	*	*	*
T113		LINFAR SHRINKAGE %	*	*	*	*	*	*	*
T111		MAX_DRV DENSITY t/m ³	*	*	1 814	*	*	*	*
	ΟΡΤΙΜΙ	IM MOISTURE CONTENT %	*	*	13 5	*	*	*	*
AS1289 3 8 1	F	MERSON AGGREGATE TEST	*	*	*	*	*	*	*
T120			*	*	5.4	*	*	*	*
				<u> </u>	5.7	I	1		<u> </u>
	$\mathbf{\Lambda}$	Accredited for compliance with		are even dried a		nronaration	unlass other	wice stated	
NA	TÀ	ISO/IEC 17025. The results of	All samples a	are oven dried a	ind dry sleved	preparation	i uniess other	wise stated	
		these tests, calibrations and/or		-	104/1;	/			
		measurement included in this document are traceable to			INTE				24/00/15
ACCRED	ITED FOR	Australian/National Standards.	APPROVEDS		DNA MANAch-	n		DATE	24/09/15
COMPE	TENCE	This document shall not be	Zil Doment O. D.	Choote Desta			dev		
i inuttic	101.3343	reproduced except in run.	2. Ireholt & nata	sneets Proforma Re	poits liest Report /	AII REV Z JUN 14.)	158		

		FALLING		RMEAB	ILITY REPO	RT	
Client:	DM Mo	cMahon Pty Ltd		Source:	3434 - Nangus		
Address:	4a Noi	rton St WAGGA WAGGA NSW	/ 2650	Sample Description:	Silty CLAY		
Project:	Materi	al Assessments		Report No:	18259-FHP		
Job No:	B1501	1		Lab No:	18259		
Test Proce	edure:	AS1289 6.7.2 So AS1289 5.1.1 So AS1289 5.2.1 So	il strength and consolidation tests - il compaction and density tests - De il compaction and density tests - De	Determination of a soil - etermination of the dry de etermination of the dry de	Falling head method for a remoulded spec nsity/moisture content relationship of a soi nsity/moisture content relationship of a soi	imen I using standard com I using modified com	npactive effort
Sampling:		Sampled by Client			Date Sar	npled:	19/09/2015
Preparatio	on:	Prepared in accordance with	the test method				
Standa	ard May	rimum Dry Donsity (t/m3)	1 91	SULIS	Hydraulic Gradient		0.0
Stanua	timum N	Moisture Content (%)	13.5				0.0
Plac		Moisture Content (%)	13.5	Ноз	d Pressure Applied (kPa))	0.0
Tiac	Mois	sture Ratio (%)	99.7	T lea	Standard Compaction)	Standard
Pl	acemer	$t Dry Density (t/m^3)$	1.81	Percentage	Aterial Retained/Sieve S	Size (mm)	0 % on 9.5
	Der	nsity Ratio (%)	100.1	Sample	e Height and Diameter (m	nm)	103.6 x 98.3
	PEF	RMEABILITY	k ₍₂₀₎ =		3.05E-10	(m/se	ec)
1.1 1.0 8.0 4.0 4.0 0.0	200E-08 000E-09 000E-09 000E-09 000E-09						
NAT	ТА	The results of the tests, calibrations and/ in this document are traceable to Aus Accredited for compliance with ISO/IEC 1 not be reproduced, except in full.	or measurements included tralian/national standards. 7025. This document shall		Authorised Signatory:		7/10/2015
		NATA Accredited Laboratory N	lumber: 14874		Bradley Morris	_	Date:
MAC	QUA	RIE				M 3 Bi	lacquarie Geotechnical Watt Drive athurst NSW 2795

ATTACHMENT 3: GUNDAGAI SHIRE EMAIL RE SOURCE OF CLAY FROM EXISTING PITS – 29/04/2016

From: Phil McMurray <<u>pmcmurray@gundagai.nsw.gov.au</u>> Date: 29 April 2016 at 4:56:09 PM AEST To: "<u>martin@mhem.com.au</u>" <<u>martin@mhem.com.au</u>> Cc: Brent Livermore <<u>blivermore@gundagai.nsw.gov.au</u>>, Andrew Brock <<u>abrock@gundagai.nsw.gov.au</u>> Subject: Clay sources for your development

Hi Martin,

Following up on your phone call in regards to potential clay supply for your development application for the expansion of the landfill.

I understand that you have been investigating the potential to source some clay from within Council controlled gravel quarries. And in particular you have visited Bangus Gravel Pit for its suitability.

Bangus Pit is on Portion 283, Parish of Bangus, Old Hume Highway, Tumblong. I confirm that Gundagai Shire Council is the Mine Holder of Bangus Pit. This Pit is registered under the Department of Primary Industries as Mine ID 41986, as a Borrow Pit for construction material on an intermittent basis.

Councils Mines Manager, and Works Overseer is Mr Kevin Britt, whom is the key contact within Council for the activities and distribution of resources from the Pit. Council does offer pit materials for sale in accordance with its adopted fees and charges policy.

The availability of material from Bangus Pit would be subject to quantity data being supplied. The material would need to pass your own permeability/compaction tests for suitability as a lining material.

Council has other Pits and if you require details of these just let me know.

I trust this helps.

Regards,

Phil.



Phillip McMurray | General Manager

GUNDAGAI SHIRE COUNCIL PO Box 34 255 Sheridan Street GUNDAGAI NSW 2722

Tel: 02 6944 0201 | Fax: 02 6944 1475 | Mob: 0413 884 164 www.gundagai.nsw.gov.au