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22 January 2019

Esther Hughes
Senior Environmental Planner
MRA Consulting Group
Via email: Esther@mraconsulting.com.au

RE: Pronto Bins, Wetherill Park – Response to Additional Information Request for Development Application No. 428.1/2018

Dear Esther,
The following outlines additional information and clarification to address the New South Wales (NSW) Environment Protection Authority (EPA) and Fairfield City Council queries regarding the *Air Quality Impact Assessment Pronto Bins, Wetherill Park* (**Todoroski Air Sciences, 2018**) (hereafter referred to as the Project).

Each comment is shown in grey italics and followed by a response.

The EPA notes that there is an existing "rolling gate" at the Site. The Applicant should be aware that, in order to control particulate emissions and noise impacts, the EPA will require that this "rolling gate" and any other doors are closed at all times while processing, and loading and unloading of waste occurs. No ingress or egress of trucks will be permitted during this time.

As the EPA still has concerns in relation to the proposal, the EPA advises that it is unable to issue its General Terms of Approval for the proposal in its current form.

The air dispersion modelling conservatively assumed all dust emission sources at the Project are located out in the open. The modelling predictions for the Project demonstrates compliance with the relevant air quality impact assessment criteria at the surrounding receptor locations.

In reality the processing, and loading and unloading of waste would occur within the building at the site which would act to control dust emissions due to shielding of these sources. The level of control due to the activity occurring within the building is likely to be 70% even with the rolling gate open (enclosed on three sides and roofed).

Based on the estimated dust emissions for the Project, the processing, and loading and unloading of waste activities account for less than 17% of the total estimated dust emissions for the Project. With a 70% control factor applied for the activity occurring within the building, the dust emissions from the processing, and

loading and unloading activities would account for just 6% of the total estimated dust emissions for the Project.

The proposed closure of the rolling gate at all times while processing, loading and unloading would therefore potentially minimise dust emissions associated with the Project by nominally 6%. This reduction in dust emissions is not expected to have a noticeable effect at the site. It is suggested instead, that the closure of the rolling gate be implemented as a mitigation measure, during times where excessive visible dust is generated during processing, loading and unloading activities.

Details of how dust will be management in terms of impacts on neighbours and worker safety shall be submitted into Council.

Section 7 of the Air Quality Impact Assessment (**Todoroski Air Sciences, 2018**) outlines a range of potential dust mitigation and management options to assist with managing dust emissions at the Project.

A detailed Air Quality Management Plan will be developed for the site. The Air Quality Management Plan would outline the measures to manage air emissions and include aspects such as key performance indicators, monitoring methods, response mechanisms, compliance reporting and complaints management.

Workers would abide by relevant Work Health Safety requirements to ensure they are in a safe work environment.

Further to the above, Endeavour Energy has assessed the application and raises concerns regarding the dust emissions from the site and has noted the following in the Air Quality Impact Assessment:

- *Section 2.1 'Project setting' describes the site as being 'situated in a general industrial area with the land use in the surrounding area characterised as a mix of commercial/industrial, rural, residential and recreational parklands' without specifically mentioning Endeavour Energy's West Wetherill Park Transmission Substation.*

The Endeavour Energy West Wetherill Park Transmission Substation is located within an area zoned as "general industrial" as per the Fairfield City Council Local Environment Plan 2013 (**Fairfield City Council, 2018**).

Figure 1 presents the Project location relative to the Endeavour Energy West Wetherill Park Transmission Substation (Endeavour Energy).

To assess the potential for air quality impacts associated with Project, the Endeavour Energy site was input as a discrete receptor into the air dispersion model for the Project. The predicted air quality levels were assessed in a similar fashion to the other identified sensitive receptors in the Air Quality Impact Assessment (**Todoroski Air Sciences, 2018**).

Table 1 presents the predicted incremental particulate dispersion modelling results at Endeavour Energy. The results show minimal incremental effects would arise at Endeavour Energy the due to the Project.

A summary of the cumulative annual average $PM_{2.5}$, PM_{10}, TSP and dust deposition levels at Endeavour Energy is shown in **Table 2**. The results indicate they would be below the relevant criteria for PM_{10}, TSP and dust deposition levels at Endeavour Energy.

As the applied background $PM_{2.5}$ concentration is already above the 8µg/m^3 criterion, the predicted cumulative $PM_{2.5}$ levels are above this level. The predicted incremental $PM_{2.5}$ impact from the Project is minimal (<0.1µg/m^3), which is <1% of the 8µg/m^3 criterion and there would be no tangible impact from the Project at Endeavour Energy.

A contemporaneous assessment of cumulative 24-hour average $PM_{2.5}$ and PM_{10} was conducted. The results in **Table 3** indicate that it is unlikely that cumulative 24-hour average impacts would arise at the Endeavour Energy site due to the Project.

Overall, the modelling prediction for the Endeavour Energy site indicate generally acceptable air quality levels, similar to those predicted for the other sensitive receptor locations near the Project.

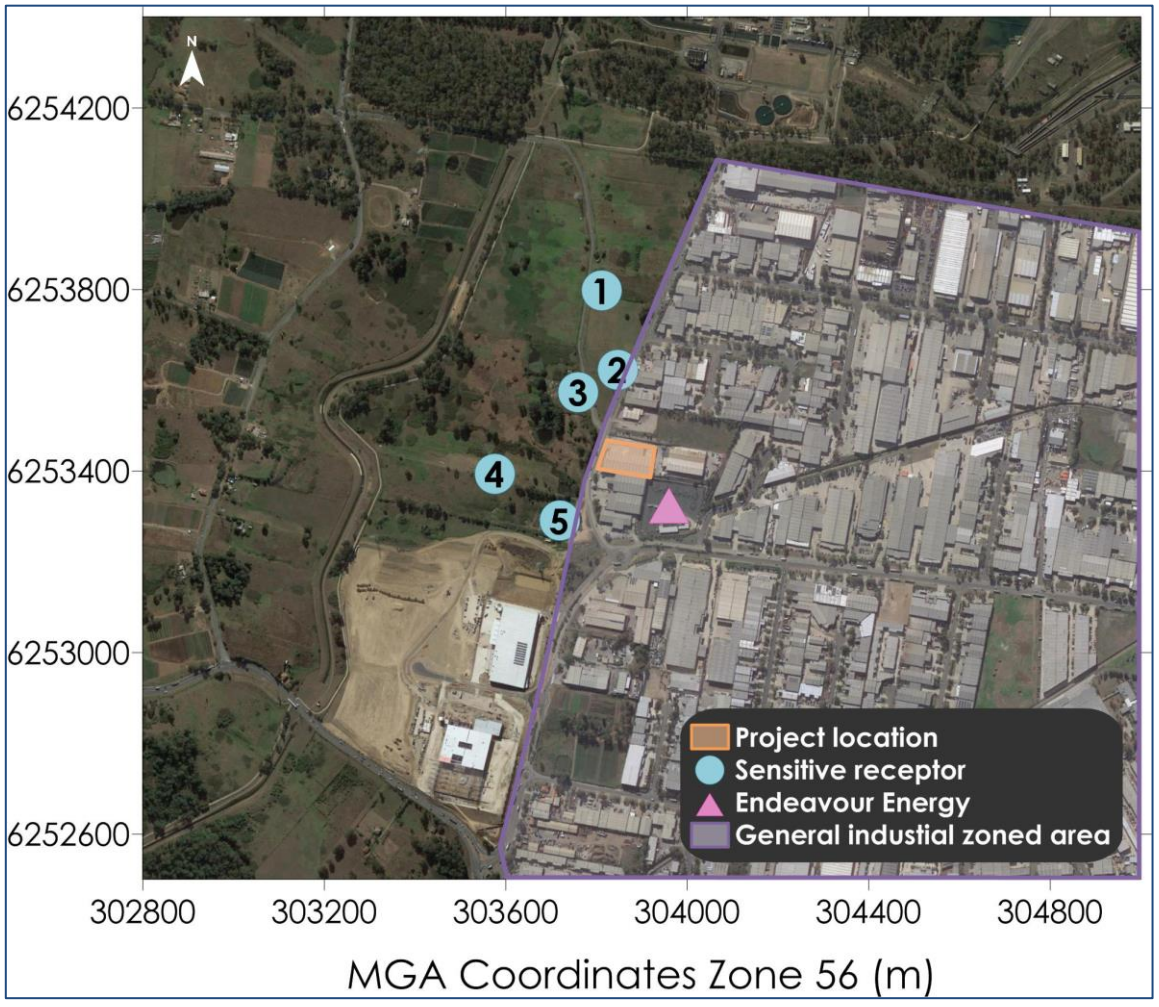

Figure 1: Project location

Table 1: Particulate dispersion modelling results – Incremental impact

Receptor	$PM_{2.5}$ (µg/m^3)		PM_{10} (µg/m^3)		TSP (µg/m^3)	DD (g/m^2/month)
	24-hour average	Annual average	24-hour average	Annual average	Annual average	Annual average
Endeavour Energy	0.3	<0.1	1.8	0.2	0.4	0.1

Table 2: Annual particulate dispersion modelling results – Cumulative impact

Pollutant	Incremental impact at Endeavour Energy	Background concentration	Cumulative impact at Endeavour Energy	Sensitive receptor criteria	Units
$PM_{2.5}$	<0.1	**8.2**	**8.2**	**8**	µg/m^3
PM_{10}	0.2	17.6	17.8	**25**	µg/m^3
TSP	0.4	63.4	63.8	**90**	µg/m^3
DD	0.1	2.8	2.9	**4**	g/m^2/month

Table 3: NSW EPA contemporaneous assessment – maximum number of additional days above 24-hour average sensitive receptor criteria

Receptor	PM_{10}	$PM_{2.5}$
Endeavour Energy	0	0

In this regard, appropriate air quality management measures shall be submitted into Council for review, demonstrating how the proposal will minimise any impact to the West Wetherill Park Transmission Substation.

Based on the modelling predictions at the Endeavour Energy site, the Project can operate within the applicable air quality impact assessment limits.

As noted, Section 7 of the Air Quality Impact Assessment (**Todoroski Air Sciences, 2018**) outlines potential measures that may be employed on-site to minimise dust impacts at nearby sensitive receptors and surrounding industrial neighbours, including the Endeavour Energy site.

Yours faithfully,

Todoroski Air Sciences

Katie Trahair

References

Fairfield City Council (2018)
"Fairfield Local Environmental Plan 2013", last updated October 2018.

Todoroski Air Sciences (2018)
"Air Quality Impact Assessment Pronto Bins, Wetherill Park", Todoroski Air Sciences, August 2018.