

Detailed information about proposal and DA submission material

1 Overview

- 1.1 The proposal seeks to increase the processing capacity of an approved resource recovery facility at 50 Tattersall Road, Kings Park and expand the operation into 46 Tattersall Road for ancillary functions, as follows:
- The processing capacity is proposed to be increased from 6,000 to 28,000 tonnes per year for solid and/or liquid organic and green waste. This will be achieved by relocating the ancillary activities such as the administration office, staff amenities and storage of trucks into the adjoining buildings at 46 Tattersall Road. This will ensure the property at 50 Tattersall Road has sufficient capacity to store and process the additional quantity of material brought to the site. No site disturbance is required, such as demolition or construction activities.
 - The operating hours approved in DA-16-04535 are sought to be maintained, being 24 hours, 7 days a week. However, EPA has required the hours of operation to be 7am to 6pm, Monday to Saturday and 8am to 6pm on Sundays and at no time work will be carried out on public holidays.
 - The nature of waste types to be processed will continue to be mixed green waste collected from stormwater gross pollutant traps and street sweepings. The resulting material is green organic material which is transported off-site to an approved rural facility to be made into mulch, compost or landscaping materials.
- 1.2 The Applicant does not propose as part of this application, a maximum limit on the volume of material to be stored on the site at any one time as was previously the case, rather only a maximum of 28,000 tonnes to be processed onsite per year.
- 1.3 The business currently operates with 6 to 8 staff over 2 shifts. The proposal will increase this staffing level by 3 to 4 additional jobs for sub-contractor truck operators.
- 1.4 The Applicant has indicated that the increase in processed materials is associated mainly with the construction of new major infrastructure in western Sydney including the Western Sydney Airport, Sydney Metro Northwest and major roads and motorways. This has led to an increase in the generation of such waste as stormwater channels, creeks and waterways are upgraded.
- 1.5 The higher urban growth in the North West and South West Growth Areas has increased the need to clean and maintain stormwater systems, parks, reserves and other urban green spaces. It is also becoming more prevalent for local councils and other statutory authorities, such as Sydney Water, to dispose of their own green waste at licenced and approved facilities such as this site.
- 1.6 The proposal will require an Environment Protection Licence from the EPA due to the increased processing capacity. The EPA has provided General Terms of Approval to this effect.

2 The operation of the facility

- 2.1 The facility is operated by Envirocivil. The main activities of this operation will continue to include the processing of environmental waste materials generated from activities such as:
- creek rehabilitation works

- stormwater channel clearing and cleaning works
 - other waterway clearing and cleaning works
 - general maintenance of waterways
 - clearing and cleaning works of stormwater quality improvement devices
 - general land rehabilitation/maintenance works
 - street-sweepings
 - drilling mud generated as part of civil works associated with road making activities
 - grass cutting at council recreation reserves and parks.
- 2.2 Envirocivil receives material into the facility by truck, from its own activities and from other contractors. Waste is then de-watered to remove liquids by gravity, passed through a screen to remove gross pollutants (which are placed in a waste bin and then disposed to landfill as general solid waste) and then pasteurised/disinfected by natural air drying. The resulting screened organics, which are the bulk of the material, are transported off-site to an approved rural facility to be made into landscaping materials and compost.
- 2.3 This existing process is proposed to continue as previously approved at 50 Tattersall Road and as described above. The increased capacity is proposed without any modifications to the building at 50 Tattersall Road or additional plant and equipment. However the increased processing volume will be achieved by relocating the existing office and truck storage function to the adjoining site at 46 Tattersall Road. This DA seeks approval to expand the approved operation into the eastern adjoining site at 46 Tattersall Road, Kings Park.
- 2.4 The proposed upgrade to the facility is in response to a growing environmental awareness by the community and local government. This awareness is driving demand for this form of facility to receive and process green organic waste and avoids sending this valuable material to landfill. This facility is capable of responding to this demand and meeting the stringent regulation and high environmental standards required to obtain the necessary approvals and Environment Protection Licence to operate.
- 2.5 The proposed increased capacity is sought by the Applicant in an effort to offer a facility which demonstrates economic viability in the recycling and reuse of green waste, as opposed to the cost of diverting green waste to landfill.

3 Management of the facility

- 3.1 The proposal is accompanied by detailed management plans to ensure that potential impacts are suitably prepared for, including:
- an Environmental Management Plan
 - an Emergency Response Plan
 - a Pollution Incident Response Management Plan, which is to be submitted to the EPA for approval in line with the licensing requirements of the site.
- 3.2 As the proposal represents Designated Development, the application is also accompanied by an Environmental Impact Statement (EIS) prepared by Claron Consulting and dated May 2019. The EIS sets out existing and proposed mitigation measures and a list of commitments to be adhered to by the management, employees and contractors operating with the site.

4 Proposed hours of operation and procedures

- 4.1 The Applicant proposes to continue to operate 24 hours a day, 7 days a week on the following basis.

- Deliveries are mostly received and processed during normal daytime working hours. However, there are some deliveries at night due to the nature of the material being collected often occurring after normal business hours. For example, street sweepings occur after hours and wet waste from construction sites occur after hours, when there is no other building activity occurring on the site.
- After hours deliveries are intermittent. On a 'heavy week' there may be 1 to 5 trucks unloading per night. However, there are many nights when there is no activity at all. It is entirely dependent upon the activity and works schedule of the receiving contractors.
- Once the material is delivered it undergoes a primary processing to remove the gross pollutants (e.g. aluminium cans and glass bottles) by hand, 'de-watering' and then a final screen. The recovered resource is then ready to be transferred out of the site to an approved landscape supply business to be turned into landscaping materials and compost. The first delivery shift will start at 7 am.
- All receipt, storage and processing of waste materials is undertaken within an enclosed building. The whole building is fully bunded to ensure materials are fully contained.

4.2 The Applicant has confirmed that the increase to the processing capacity proposed in this application will be mainly occur during the normal business hours daytime, with only a small component of the business activities being at night.

5 Access, traffic and parking matters

- 5.1 The 2 existing driveways are being retained, including the weighbridge on the western driveway. The proposed relocation of the administration functions and truck parking (from the buildings at 50 Tattersall Road to 46 Tattersall Road) will improve the operation of the part of the facility by providing increased storage and handling capacity, as well as improvements to truck movements on-site.
- 5.2 The proposal will enable daily on-site truck movements to increase from 4 trucks entering and exiting the site per day, to up to 18 trucks entering and exiting the site per day.
- 5.3 The size of the largest truck to be used on site is an 8.8 m long medium rigid vehicle. Trucks will be parked on-site in the designated truck bays.
- 5.4 The existing car parking arrangement will be retained, being 7 car parking spaces in the street setback area.
- 5.5 The site currently operates with 6 to 8 staff over 2 shifts. The proposal will retain this staffing level, plus 3 to 4 additional jobs for sub-contractor truck operators. This results in a maximum of 12 staff working at any one time.
- 5.6 The truck drivers are contractors with their own trucks, so they arrive and leave in their own working vehicles. There are a couple of trucks associated with the business but these are off-site (doing deliveries and pickups) during the day. These drivers are part of the '6-8 staff' so there is no additional parking demand generated. The 3 to 4 additional sub-contractor truck operators also provide their own working vehicles and do not require on-site car parking. Therefore, sufficient staff on-site car parking is provided.

6 Stormwater management

- 6.1 The site will continue to be managed in such a way that 'clean' and 'dirty' areas will be managed separately as 2 small sub-catchments. There will be a 'nil discharge' from the 'dirty' area as this water will be stored in a 30,000 litre holding tank. The 'clean' water will meet our criteria for water quality before being discharged into the stormwater system.

- 6.2 Rainwater is collected and used for washing down areas and for indoor dust suppression (including the delivery of a fine mist below the ceiling within the covered areas when the air becomes dry and dusty, if and when required).

7 Dust and air quality matters

- 7.1 There is a very small chance that dust will be generated and leave the site due to all potentially dust generating activities being undertaken within an enclosed building. These potential activities include unloading, processing and loading of materials.
- 7.2 Dust mitigation measures installed on site and made available at all times during normal operations include the use of sprinklers, hoses and mist sprayers. In addition, high efficiency dust control techniques will be used on site to prevent dust emission from leaving the site.
- 7.3 Additional dust mitigation measures include the installation of 2 new misters at the entry point to the unloading area which will be activated automatically by motion sensors to avoid human error. The new misters will activate as a truck is reversing into the unloading area to deliver its load. In that area, additional dust curtains will also be installed to reassure all stakeholders that no dust will be visible or leave the site.
- 7.4 A similar system will also be installed in the screening area to ensure that generation of dust will be minimised and controlled within that enclosed area.
- 7.5 The following specific mitigation measures will also be implemented on site to assist in reducing the generation of dust from the proposed activities:
- All vehicles travelling within the boundaries of the site must not travel faster than 20 km per hour at any time other than in an emergency
 - All material will be transported in covered loads
 - Daily cleaning of trafficable areas using a road sweeper
 - Regular inspections of the external areas to ensure that transfer of dust from active working areas to other areas is minimised
 - Regular cleaning of areas where waste materials are stored especially after every occurrence of transporting these materials offsite
 - Conduct regular inspections as part of the worksite inspections to confirm or otherwise that this cleaning regime is efficient and sufficient in adequately reducing on site dust.
 - All reasonable measures are employed at the site to prevent dust emissions beyond the boundary of the premises.

8 Odour matters

- 8.1 The Applicant advises that the nature of the green waste to be received and processed on site will be non-putrescible in nature. It is general solid waste (non-putrescible) as per the definition in the POEO Act, which states as follows:

'Division 1 Waste classifications

49 Definitions of waste classifications

(1) In this Schedule—

general solid waste (non-putrescible) means waste (other than special waste, hazardous waste, restricted solid waste, general solid waste (putrescible) or liquid waste) that includes any of the following:

(c) household waste from municipal clean-up that does not contain food waste,

- (d) waste collected by or on behalf of local councils from street sweeping,*
- (g) garden waste,*
- (h) wood waste,*
- (m) non-putrescible vegetative waste from agriculture, silviculture or horticulture,*
- (p) virgin excavated natural material'.*

8.2 The 5 stages of the process as advised by the Applicant include:

1. **Sorting:** - This stage involves the manual removal of large objects from the materials transported to the site such as plastic bottles, aluminium cans and other objects that are generally larger than 100 mm in size. Sometimes this stage continues throughout the de-watering and stockpiling stages to ensure that all these objects are removed prior to reaching the screening stage.
2. **Dewatering:** - The first stage of materials processing on site is to remove most liquids from the wet materials to facilitate the next stages of processing.
3. **Screening:** - The materials are processed through a trommel screen to ensure that all objects greater than 40 mm are removed from the finished products prior to being stockpiled for maturing. Further screening will then occur to ensure that all finished product is less than 10 mm.
4. **Pasteurising:** - Pasteurisation of the stockpiled material occurs by natural (air) drying; There is no thermal treatment of the waste on the site at any stage of the process.
5. **Off-site stockpiling/mixing of the finished materials:** - The final material is then trucked off-site to a separate facility where it is then mixed and composted.

This was confirmed during a voluntary audit recently undertaken on both the Applicant's previous and existing sites. The Applicant states that a screening procedure is undertaken on each load entering the site prior to unloading, to check for materials not allowed to enter the site, including potentially odorous materials, particularly putrescible matter (matter which may decay). This procedure is strictly enforced and is supervised by the site manager. This procedure will assist in reducing the potential for odour generation on site. Loads which arrive on site with putrescible material, or which present noticeable odours, will not be accepted on site and will be sent back to their original source or to a lawfully licensed landfill that can accept such materials.

8.3 The application was accompanied by an Air Quality Impact Assessment prepared by Claron Consulting and dated September 2018. The report concludes that the odour emissions from the proposed activities comply with the adopted EPA criteria at all residential receptors.

8.4 The report also notes that this area experiences elevated levels of background dust due to the existing industrial activities. However, this exceedance is not the result of the proposed activities of Envirocivl but rather as a result of existing activities in the Blacktown area.

8.5 The report concludes that no additional mitigation techniques are required. However, additional misting sprays into the screening drum may help to reduce the impact of odour on industrial receptors.

8.6 The current operation uses the same process with no record of complaints.

9 Noise matters

9.1 The DA was accompanied by an Acoustic and Vibration Assessment report prepared by Envirotech dated September 2018. It concludes that, based on their intended continuation of their 24 hour operation, that the noise generated will be negligible, particularly given the

existing 3 m high concrete wall surrounding the external portion of the site provides for suitable noise attenuation.

9.2 The Acoustic / Vibration Assessment Report states the following:

- that the NSW Road Policy (2011) is applicable to the DA and applies different noise limits dependent upon the development category and receptor type.
- that for developments with potential to create additional traffic on local roads, noise levels are:
 - Day: 7am - 10pm LAeq (1hr) 55 dBA
 - Night: 10pm - 7am LAeq (1hr) 50 dBA
- that traffic arising from the development should not lead to an increase in existing noise levels by more than 2 dBA.
- that from the major thoroughfare's servicing the proposed development, truck movements should not pass through residential areas between the major thoroughfare's and the site.
- that the site is located within an existing industrial area. The proposal will not introduce new noise sources to the local area nor is it expected to reduce the acoustic amenity of the nearby area. It is expected the noise level contribution from the proposal would be considered insignificant when compared to the existing levels of industrial noises, including those of traffic and transport noise from the surrounding roads and operations at the Tattersall Road industrial precinct.
- that the nearest sensitive receptor property boundaries are located to the north and west of the site, which are neighbouring industrial allotments. From the centre of the proposed working area to these property boundaries is approximately 14m. The minimum required 'Weighted Sound Reduction Index' (Rw) from the site to the nearest industrial receptor is 1.94 dBA.

10 Other matters

- 10.1 The proposal does not seek to consolidate the 2 lots due to the lots being the subject of separate leases.
- 10.2 The Applicant claims that the consolidation of lots is not required to allow a development consent to take effect, nor is it required for an environment protection license to be issued for this activity.
- 10.3 The Applicant also states that the consolidation of lots would also restrict the premises reverting to other industrial uses at some future time.
- 10.4 No new signage is proposed.
- 10.5 No new external lighting is proposed.
- 10.6 The Applicant undertook community consultation to inform the preparation of the EIS. This included door knocking and handing out leaflets explaining the proposal to approximately 50 surrounding industrial properties. It is stated in the EIS that there were no negative comments received with regard to this specific proposal.