



DOC23/261065-4

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Response to Modification of Integrated Development Consent (PAN-315245) for Mod 23/0058, CNR-53585

Dear Jacqueline,

Thank you for consulting with the NSW Environment Protection Authority (EPA) about Concurrence and Referral (CNR) CNR-53585, Agency reference number A-63544 application to modify development consent through Mod 23/0058 at Tyrecycle Facility, 1-21 Grady Crescent Erskine Park 2759 NSW (the Premises).

Of note, an existing Environment Protection Licence (EPL) number 21464 has been in place for the Premises since 19 May 2021.

The development application proposes to amend the consent as follows:

- Modification to an Approved Waste Management Facility (Tyre Recycling) to Increase Processing Capacity from 29,000t to 60,000t per year.

The EPA has reviewed the following documents:

- *Tyrecycle, Erskine Park Facility, Statement of Environmental Effects, prepared by Element Environment, 28 February 2023.*
- *Tyrecycle Erskine Park Facility, Operational Plan of Management, prepared by Element Environment, 8 March 2023.*
- *Noise Assessment, prepared by Element Environment, 12 November 2022.*
- *Air Quality Impact Assessment, prepared by Element Environment, 22 February 2023.*
- Tyrecycle Erskine Park, Fire Risk Assessment Reference: 283146-10 FRA I1, prepared by Arup Australia Pty Ltd.

NSW EPA Position

The EPA does not object to the proposal to modify the consent.

However, if the consent is modified as proposed, the proponent will need to submit a separate application to vary EPL 21464.

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Of note, EPA officers visited the Tyrecycle facility on 27 April 2023 to conduct an inspection in relation to the modification request. The recommendations provided are based on the documents provided and the observations on site.

Recommended Conditions for Mod 23/0058

If granted, the EPA requests Penrith City Council (PCC) include the following conditions within the consent:

- i) All the material on-site must be stored in a covered and bunded area to prevent the escape of material to the environment.
- ii) The roller doors must be closed when not in use and it is recommended that automatic shutting doors be installed if feasible.
- iii) The site must implement a waste tracking system to measure and monitor the material on site in relation to the licenced any one-time authorised amount.
- iv) The proponent must undertake additional air quality monitoring to confirm the air emission performance of the discharge point(s) servicing the cyclone filter. This additional monitoring is required within the first six weeks when the throughput increases to the 35,000 tonnes threshold and again when the throughput of 60,000 tonnes is reached.

The monitoring required by this condition should be in accordance and in compliance with the Conditions E4.1 and E4.2 of EPL 21464. The EPA may utilise the information contained in the report submitted to revise or include additional conditions in this EPL.

Other matters to be addressed

- i) **The EPA recommends** an increase in the maintenance frequency of the onsite stormwater management system must be undertaken.
- ii) **The EPA recommends** the applicant provide a contingency plan to manage the volume of material onsite in the event that dispatch of outgoing material is hindered due to issues with any third-party transport providers.
- iii) **The EPA recommends** additional bunding (drive-over fire retardant bunding) to be provided at the roller doors to direct the flow of fire water to the recessed area beneath the loading area as advised in Section 8.3 Water Containment of the Fire Risk Assessment (ARUP, 2022).

Please note that the EPA has not considered the amendment of the any one-time authorised amount of waste permitted on the premises as a part of this modification advice.

If you have any questions about this request, please contact Khushboo Singh on 0467 729 611 or via email at Khushboo.singh@epa.nsw.gov.au.

Yours sincerely



5 May 2023

Hamish Campbell
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NSW Environment Protection Authority