Summary of the Project	NSW EPA RFI 01/07/2024
6 Sleigh Place, Wetherill Park NSW 2164	DA 350.1/2023

Increase from 29,500 tonnes per annum (tpa) to 65,000 tpa, by extending operating hours to 24/7, comprising:

- Stormwater/GPT material: 64,000 tpa (30,500 tpa increase)
- Wood waste (sawdust): 1,000 tpa (input to aid processing).

Residuals analysis in accordance with EPL #20694 and EPA Waste Classification Guidelines, then:

- Disposed to appropriate landfill
- GSW CT1 to beneficial reuse (in accordance with Classification & Resource Recovery Order if suitable) and;
- Treated and discharged to sewer in accordance with Sydney Water Trade Waste Agreement (TWA #38666).

➢ Mainstream Recycling has formally withdrawn the 4,000 tpa street sweeping waste component from its application (29 March 2024, refer NSW Planning Portal).

➢ No other changes to proposal or DA documentation required.

NSW EPA Request for Information

Water Treatment	**Response**
The proponent states in the EIA that Sydney Water's discharge (Trade Waste) requirements have been reviewed and it is not anticipated that any changes will be required; however, the EPA requires evidence of this. a) The EPA requests that in future applications the proponent provides evidence that the Sydney Water Trade Waste Agreement has been amended or agreed in principle to accommodate for the	Mainstream Recycling has held a Sydney Water Trade Waste Agreement (**Attachment 1: Consent No. 38666)** since commencement of operations in 2015, in full compliance with all water quality, quantity, and reporting conditions. The maximum daily volumetric limit is 140,000 litres (condition 3). Based on historical data of the Facility, treated stormwater GPT material generally comprises:

projected increase of discharges as a result of increasing production.	• water fraction = 27%; • waste to landfill eg PET bottles = 3% • sand, aggregate, silt and organics: 70% (GSW CT1). Therefore, • For 29,500tpa: daily average discharge to sewer = 25,000L. • For 64,000tpa: daily average discharge to sewer = 47,500L. All water is treated by Mainstream Recycling prior to discharge. As the nature of the increased waste will be similar to existing stormwater waste, treatment capability, capacity and compliance is expected to readily be achieved. Mainstream Recycling does not anticipate any significant changes to the treatment system or Sydney Water Trade Waste Agreement will be required.
Maintenance of new odour management system	
The EIS states that the existing activated-carbon scrubber system will be duplicated to achieve five air changes per hour inside the facility to accommodate for the increased waste throughput and operational hours. The proponent also states that the additional scrubber would also provide contingency in the event of equipment failure. The EPA requires clarification as to how the additional scrubber will serve to accommodate increased waste throughput as well as provide contingency. In future applications, The EPA requests that the proponent provides the following information regarding the odour mitigation system:	The Facility has a granular activated carbon (GAC) air treatment system that discharges treated air through a vent stack in the roof to the atmosphere. Stormwater waste is generally not odorous or offensive, as evidenced during routine EPA Facility inspections. There have been no complaints from neighbours, or non-compliance, since commencement of operations in 2015. Mainstream Recycling will upgrade the fan and motor to achieve five air changes per hour, and has installed another GAC cannister in parallel to provide contingency for air treatment. This currently could operate in series, although there is no noticeable odour within or immediately outside the Facility. The system can be readily modified or upgraded to optimise air quality outcomes if required. No change to the vent stack is proposed or required, and exit velocity will be maintained at 15 m/second during operations.

	Further fan upgrades, or additional GAC cannisters, could be readily carried out should this be required. Modelling (EIS Appendix G, AirLabs) concludes there will be no offensive odours at or beyond the boundary of the premises, in accordance with industry best-practice and the Facility's EPA licence. As importantly, Mainstream recycling operates the air quality treatment system to maintain a safe and healthy working environment within the Facility, for workers and visitors. Mainstream Recycling would priorities this safe internal environment over operations, and would therefore always pause work in the event of an equipment failure until repairs or replacements have been carried out and verified.
a) A proposed maintenance schedule for the new activated-carbon scrubber system.	Annual maintenance will be carried out as a minimum, with on-call response from supplier for repairs or replacement GAC units or fan motors if required.
b) Contingency measures for the new activated-carbon scrubber system which account for system failure as well as the increased waste throughput at the premises.	GAC units are readily available in Sydney, and Mainstream Recycling can procure and install another GAC unit within 24 hours. As above, production would pause if system failure or non-compliance occur, until HVAC specialist has repaired and certified the air quality control system.
Waste	
a) The reference to street sweeper waste, which the EPA understands is to be withdrawn from the proposal, should be removed from the EIS and all supporting documentation for clarity and consistency.	Revised information provided by Mainstream Recycling (this RFI). Refer NSW Planning Portal for formal withdrawal of street sweeper waste.
b) The maximum volume of waste to be stored on the premises at any one time.	No maximum storage with DA conditions or EPL #20694. However maximum storage of treated material stored on site is 1250 tonnes.
c) Proposed maximum waste stockpile dimensions. These should also be indicated on the site plan.	The unloading bay is 3.905m deep x 7.32 m wide, as shown on **Attachment 2: Mainstream Wetherill Park - Site Plan_DA**

	TR231123 Arch Plans, and Portal. Waste can also be discharged directly into the in-ground unloading bay (60m3 capacity).
d) Details of how stockpile sizes will be managed, considering the increased input of waste.	Daily load-out in 19m semi-trailers (four per week). Can be supplemented with HRV (11.00m tipper) load-outs as required. Mainstream Recycling aim to minimise waste volumes held at the Facility to optimise housekeeping and operating flexibility.
e) Quarantine areas for unexpected finds need to be indicated on the site plan.	Sulo-bin and sharps canister on site. Asbestos (ACM) and quarantine management plans: all staff trained and procures can be provided. As the Facility has operated since 2025, waste types are well known, and unexpected quarantine finds are generally double-wrapped and placed in the quarantine bin or sharps canister for safe appropriate disposal off-site. These are located adjacent to the waste unloading area and will be included in the site plan to be included in the updated Waste Management Plan to be submitted as part of the EPL Licence amendment application.
f) The physical and chemical content of the waste types being accepted.	Refer to attached laboratory analysis and classification by SESL (**Attachment 3: J002702 Recovered SS and GPT and Outgoing Nov. 2020**). Note that Street Sweeping Waste no longer proposed). Additional data from NATA-accredited laboratories can be provided upon request.
g) Details of all RROs and RREs referred to in the EIS and supporting documentation need to be provided.	All waste is sampled, analysed and classified in accordance with NSW EPA Waste Classification Guidelines, and transported to an appropriately-licenced Facility. A site-specific RRO/RRE is not proposed or required. Treated material, apart from water fraction and waste fraction (eg PET bottles, plastics) is generally transported off-site as GSW (CT1) to appropriately licenced facilities in accordance with market conditions.
h) Clarification of the quality control measures for processed Gross Pollutant Trap (GPT) waste material outlined on page 7 of	The referenced Waste Management Plan (EIS Appendix J, PLA-TDG-011-01) was prepared in support of a previous modification

the Waste Management Plan (WMP). In this part of the WMP, Mainstream identifies a potential risk for the release of processed GPT material as "environmental pollution/site contamination" and states that the control measure identified for this risk is "analyte schedule & thresholds referencing current EPA Resource Recovery Orders & Exemptions". Mainstream must provide a copy of the relevant RRO/RRE referred to in this section to allow the EPA to assess control measures.	seeking approval for street sweeper waste, which has since been withdrawn. A draft revision of this Waste Management Plan has been prepared (**Attachment 4, PLA-TDG-MR-036-02 ver 2, July 2024)**, and would be revised should this proposal be approved and submitted in support of the EPA Licence #20694 amendment application.
Management Plans	
Mainstream must ensure that new versions of the Waste Management Plan (WMP) in any future applications address the following issues:	Revised WMP provided (**Attachment 4, PLA-TDG-MR-036-02 ver 2, July 2024**). To be revised and updated should this proposal be approved, and submitted in support of the EPA Licence #20694 amendment application.
1. The reference to street sweeper waste should be removed from the EIS and all supporting documentation for clarity and consistency.	This RFI prepared to clarify any inconsistencies between the EIS as submitted, and the proposal as modified (ie withdrawal of 4,000tpa street sweeping waste).
2. The WMP currently only makes reference to Modification 2 of (DA 803.4/2014) and not the current DA. Additionally, the WMP only considers an approved waste limit of 29,500 tpa and not the new annual limit proposed in this DA of 65,000 tpa.	WMP has been revised (**Attachment 4, PLA-TDG-MR-036-02 version 0.2, July 2024**) Should the 65,000tpa proposal be approved, WMP to be revised and submitted to NSW EPA as supporting documentation for EPL #20694.
3. The operating hours outlined in the WMP do not account for 24/7 operation as stated in the EIS.	Refer above.
4. Sawdust is not included in the breakdown of waste streams in the WMP but is included in the breakdown of waste streams in the EIS.	Virgin sawdust to enhance production procured through a supplier from a range of sources (eg Kempsey, Tumut, Mt Gambier sawmills) depending on market conditions. Will be included in above update of Waste Management Plan.
5. The summary of resource recovery processes provided on page 5 of the WMP implies that recovered material generated at the Premises is applied to land as landscaping material under a current RRO/RRE. On 7 June 2024 the EPA spoke with a Mainstream representative who confirmed that all recoverable materials are sent to recyclers for further processing, meaning that	WMP has been revised, as above. Treated material classified as GSW (CT1) and transported to appropriately-licenced facilities (eg Brandown or similar). No site-specific RRO/RRE proposed or required as part this DA.

the end-product is not being produced at the Premises. The Proponent must ensure that all documentation clearly and correctly demonstrates all stages of processing, from acceptance of the waste at the Premises to end-product.	
Attachment 1: Sydney Water Trade Waste Agreement Consent #38666. **Attachment 2: Mainstream Wetherill Park - Site Plan_DA TR231123 Arch Plans** **Attachment 3: J002702 Recovered SS and GPT and Outgoing Nov. 2020** **Attachment 4: PLA-TDG-MR-036-02 Version 0.2, July 2024**	