

Summary of the Project		RFI 22/03/2024
6 Sleigh Place, Wetherill Park NSW 2164		DA 350.1/2023
<p>Increase from 29,500 tonnes per annum (tpa) to 65,000 tpa, by extending operating hours to 24/7, comprising:</p> <ul style="list-style-type: none"> <li>Stormwater/GPT material: 60,000 tpa (30,500 tpa increase)</li> <li>Wood waste (sawdust): 1,000 tpa (input to aid processing)</li> <li>Street sweeper waste: 4,000 tpa (as approved).</li> </ul> <p>Residuals analysis in accordance with EPL #20694 and EPA Waste Classification Guidelines, then:</p> <ul style="list-style-type: none"> <li>Disposed to appropriate landfill</li> <li>GSW CT1 to beneficial reuse (in accordance with Classification &amp; Resource Recovery Order if suitable) and;</li> <li>Treated and discharged to sewer in accordance with Sydney Water Trade Waste Agreement.</li> </ul>		<p>Mainstream Recycling has formally withdrawn the 4,000 tpa street sweeping waste component from its application (29 March 2024). Amended proposal comprises:</p> <ul style="list-style-type: none"> <li>Stormwater/GPT material: 64,000 tpa (30,500 tpa increase)</li> <li>Wood waste (sawdust): 1,000 tpa (input to aid processing).</li> </ul> <p>No other changes to proposal or DA documentation required.</p>
<b>Car Parking Arrangement</b>		

<p>Pursuant to Chapter 12 – Car Parking, Vehicle and Access Management of the Fairfield City Wide Development Control Plan 2013 (FCW DCP 2013), to determine the minimum number of car parking spaces required for a ‘resource recovery facility’, a survey is to be conducted of a comparable facility.</p>	<p>The EIS includes an assessment of Parking requirements, and a detailed analysis Traffic &amp; Transport Assessment Report for Proposed Additional Capacity and Increased Hours of Operation for Gross Pollution Trap Facility (Transport &amp; Urban Planning, EIS Appendix I).</p> <p>Table 2.1: Comparison of Existing and Proposed Operation with Higher Capacity of 65,000 tpa, sets out that employees will increase from existing fifteen (15) to twenty (20) at proposed maximum capacity, providing ample capacity as the number of carparking spaces is 23.</p> <p>Section 5.1 of the above Report assesses the car parking capacity against the existing and proposed carparking requirements, and concludes that the provision of car parking at 6 Sleigh Place is adequate for the facility.</p> <p>We note that the above Report incorrectly describes the Depot and Trucks at 103 Cowpasture Road as Mainstream Recycling trucks. As set out in the EIS, this depot and the trucks operating from the Cowpasture Road are owned by Total Drain Cleaning (not Mainstream Recycling).</p> <p>Further, the Report describes that Fairfield Citywide DCP does not provide a specific carparking rate for waste or resource recovery facilities, and that a merits-based assessment, based on the operational characteristics of the specific facility, should be assessed. This is our experience of the DCP, based on several similar facilities (in Davis Road, Wetherill Park). For example, some Facilities have sales/administration staff on site, while others deliver these services from Head offices. Working-from-home has reduced car parking requirements at some facilities.</p> <p>We would be happy to discuss further should Council require more specific examples.</p>
<p><b>Building Code of Australia (BCA) Report</b></p>	
<p>BCA Report required to determine compliance with:</p> <ul style="list-style-type: none"> <li>• Energy efficiency</li> <li>• Toilet facilities</li> </ul>	<p>We have discussed this request at length with an accredited BCA certifier. We have been advised that, as no alteration or additions are proposed as part of the development application, no changes will be made to the topics requested. Specifically, the BCA requested details of Volume 3 of the National Construction</p>

<ul style="list-style-type: none"> <li>• Section J (sustainability &amp; energy efficiency)</li> <li>• Disabled access</li> <li>• Fire separation</li> <li>• Fire access</li> </ul>	<p>Code, which covers stormwater and sewage etc. As there will be no changes to stormwater (all processing and storage is carried out inside the existing building), there are no changes or matters to be addressed. Wastewater discharges are subject to Mainstream Recycling's Sydney Water Source Control Agreement.</p> <p>Note that annual fire safety certification is carried out by Mainstream Recycling.</p> <p>We would be pleased to discuss further with Council.</p>
<p><b>Traffic Management (Detailed Loading Schedule)</b></p> <p>Detailed Loading Schedule:</p> <p>A detailed Loading Schedule shall be submitted to Council, which includes, but not be limited to, the following information:</p> <ul style="list-style-type: none"> <li>• The amount, types and size of all service vehicles (existing and proposed) that will access the site on an hourly basis throughout the day/week. The Applicant shall demonstrate that the site will be managed in a way that will not affect the traffic circulation within the site and/or cause vehicle queuing onto the external road network;</li> </ul>	
	<p>The EIS includes an assessment of Parking requirements, and a detailed analysis Traffic &amp; Transport Assessment Report for Proposed Additional Capacity and Increased Hours of Operation for Gross Pollution Trap Facility (Transport &amp; Urban Planning, EIS Appendix I).</p> <p>Table 2.1 of the above Report sets out existing and proposed loads and vehicles, and Table 2.1 hourly peaks anticipated. Section 5.2 of the above Report assesses the internal operations and concludes the proposed operation is satisfactory and compliant.</p> <p>Section 4.3 of the above Report sets out the assessment of Internal Operations and Impacts for the proposed maximum capacity of 65,000tpa and concludes that "vehicles will not queue out of the site as all vehicles can enter and enter the site in a forward direction. In addition, on-site manoeuvring is satisfactory and compliant with AS2980.2." Figures 9A, 9B and 10 set out swept path manoeuvrability and demonstrate compliance with relevant standards and safe operation.</p> <p>Section 5.2 of the above Report sets out vehicle access and internal circulation, and describes how all vehicles enter and exit the Facility via separate driveways in a forward direction. Driveway widths, sight distances, internal manoeuvring, car parking spaces and layout, and internal operation are concluded to be satisfactory and compliant with AS2980.1 and AS2890.2 requirements.</p>

	Appendix 1 of the above Report provides the Operations and Loading Management Plan for the Facility at the proposed maximum capacity of 65,000pa. This provides practical implementation guidelines of the assessment in the Report.
The Applicant shall demonstrate how all service vehicles can accurately be weighed using the weighbridges onsite.	The weighbridges are tested and calibrated every 12 months routinely or as required. The weighbridges are trade-certified by Australian Government Agency, Department of Industry, Innovation and Science, and are routinely inspected and maintained by the manufacturer. The most recent calibration was conducted in May 2024 in which it passed. Certificates (x2, inbound/outbound) are attached below.
<b>Management Plans</b>	
Detailed information and procedures requested for hourly/daily waste received, processed, stored, sent to landfill or recycling.	<p>The EIS and Traffic Report provides anticipated volumes and how they will be managed. Detail is provided in Mainstream Recycling's Operations and Waste Management Plan for the Facility, which are subject to ISO-auditing and annual review, and provide detailed procedures for staff and drivers in the use of weighbridges, electronic recording systems etc.:</p> <ul style="list-style-type: none"> <li>• Operations Management Plan: PLA-TDG-MR-010-04 Mainstream Facilities</li> <li>• Waste Management Plan: PLA-TDG-011-01 Mainstream Facilities.</li> </ul> <p>Mainstream Recycling proposed that should the DA be issued for the 65,000tpa throughput, and as no construction phase is required for the proposal, that these Plans be updated and submitted to Council either:</p> <ul style="list-style-type: none"> <li>• Following a specific time post-DA (eg 28 days), or;</li> <li>• At the time of lodgement of the Environment Protection Licence amendment application, for which such Plans are generally provided as supporting documentation.</li> </ul> <p>We would welcome the opportunity to discuss with Council further.</p>
<b>Architectural Plans</b>	
	<b>The car parking spaces which are allocated to visitors.</b>

<p>An assessment of the application has revealed the submitted Architectural Plans contain insufficient information. Amended Architectural Plans shall be submitted to Council which address the following deficiencies:</p>	<p>The facility at 6 Sleigh Place Wetherill Park has twenty three (23) car parks, of which two (2) are allocated to visitors (see numbers 15 &amp; 15, Figure 3, Traffic &amp; Transport Assessment Report for Proposed Additional Capacity and Increased Hours of Operation for Gross Pollution Trap Facility (Transport &amp; Urban Planning, Appendix I).</p> <p><b>The intended purpose/use of the two (2) boxes located immediately west of the first weighbridge.</b></p> <p>As attached, the two boxes represent a sedimentary system to which drains to a sump. A pump contained in a 3mm perforated steel mesh sump pumps to the water treatment plant.</p> <p><b>The capacity of the two (2) water treatment tanks located in the north eastern corner of the building.</b></p> <p>Each tank has a maximum 80kL capacity. Water level sensors are located within the tank and has ability to trigger a 24hr monitored back-to-base security control room. Currently set to 60%.</p> <p><b>The capacity of the unloading bay and soil/mulch stockpile bays.</b></p> <p>The unloading bay has a 60m<sup>3</sup> capacity. The soil/mulch stockpile has a 92m<sup>3</sup> per bay (x2) capacity.</p> <p><b>The dimensions of both of the weighbridges.</b></p> <p>The dimensions of each weighbridge are 10m X 3.5m. Each weighbridge has the ability to split axle weight for multi-trailer vehicles, hence all vehicles required for the Facility can be electronically weighed and recorded entering and exiting. Note that the above Management Plans provide detailed procedures for weighing and recording each load, stored to the cloud and monitored by CCTV.</p>
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<p>Furthermore, the Applicant shall submit the following additional plans for Council's consideration:</p> <ul style="list-style-type: none"> <li>• Elevation Plans from a north, eastern and western perspective.</li> <li>• Roof Plans.</li> <li>• Mezzanine Floor Plan.</li> <li>• Landscaping Plans, prepared by a Landscape Architect, which demonstrate satisfactory planting onsite.</li> </ul>	<p>As discussed with Council officers at the recent site inspection/meeting subsequent to the issue of the RFI, no alterations, additions or building works are proposed. The existing air quality discharge bent through the building roof will not be altered (only an additional activated carbon filter added internal to the building). Therefore, as no changes are proposed to the building, further elevations, roof plans or internal plans are not required.</p> <p>Similarly, no changes to the existing landscaping are proposed, and the existing landscaping within the Sleigh Place perimeter frontage will not be impacted by the proposal.</p>
<p><b>Insufficient Information</b></p>	
<p>An assessment of the application has revealed insufficient information has been submitted to enable Council to conduct a detailed assessment. An amended Environmental Impact Statement (EIS) shall be submitted to Council, which clearly addresses the following items:</p> <ul style="list-style-type: none"> <li>• The amount of waste sent to landfill per day/annum.</li> <li>• The amount of waste received onsite per day.</li> <li>• The amount of waste taken off site per day.</li> <li>• The amount of waste that will be recycled per day/annum.</li> <li>• The amount of waste that will be discharged to the sewer per day/annum.</li> <li>• The amount of waste, including the types of waste, that will be stored onsite at any given time.</li> <li>• The amount of organic material generated for beneficial reuse per day/annum.</li> </ul>	<p>The EIS sets out predicted volumes of incoming, processing, and outgoing material for the existing approval and proposed amplification. Reporting is also carried out in accordance with the NSW Environment Protection Authority (EPA) reporting requirements, including annual returns for Licence # 20694, which are published on the EPA's website.</p> <p>Liquid discharges to sewer are reported to, and subject to monitoring by, Sydney water in accordance with the Source Control (Trade Waste) Agreement.</p> <p>Mainstream Recycling is in the process of reviewing and updating the Operations and Waste Management Plans for the site, and if approved, this will include fully detailed procedures for the proposed amplification.</p> <p>Please note also:</p> <ul style="list-style-type: none"> <li>• Unit 2/103 Cowpasture Road is the depot operated by Total Drain Cleaning (TDC, ABN 17 130 467 346), the company that owns and operates the trucks, is a completely different entity to the proponent and operator of Recycling Facility at 6 Sleigh Place. TDC is the primary customer, and holds a long term renewable lease of the depot at Unit 2/103 Cowpasture Road.</li> </ul>

<ul style="list-style-type: none"> <li>• The minimum number of staff present onsite at any given time.</li> <li>• The maximum number of vehicles stored onsite at No. 103 Cowpasture Road, Wetherill Park.</li> <li>• The maximum number of truck movements at No. 103 Cowpasture Road, Wetherill Park per day.</li> <li>• The activities and processes to occur onsite outside of the stipulated core processing hours, being 5:00am – 10:00pm, Monday to Sunday.</li> <li>• The proposal seeks to significantly increase the number of truck movements onsite. The Applicant shall demonstrate how sufficient and safe pedestrian access is provided onsite in accordance with Clause 9.2.6 – Pedestrian Movement of the Fairfield City Wide Development Control Plan 2013 (FCW DCP 2013).</li> </ul>	<ul style="list-style-type: none"> <li>• Receival of waste and processing will occur only outside of 5:00am – 10:00pm, Monday to Sunday, as the site approaches maximum proposed capacity, or during contingencies. Mainstream Recycling would generally prefer not to use the full 24 hours, as two shifts per day is the preferred model for a range of criteria.</li> <li>• Traffic &amp; Transport Assessment Report for Proposed Additional Capacity and Increased Hours of Operation for Gross Pollution Trap Facility (Transport &amp; Urban Planning, Appendix I), provides an assessment of entry, exit and internal operations of trucks for the proposal. Visitors are escorted during inspections, and generally view the operation from the mezzanine floor window. All staff are fully inducted into safe movement throughout the site, and wear full PPE including high-visibility vests. Line markings and signage clearly indicate pedestrian routes around the Facility. It is considered that there is sufficient and safe pedestrian access at the Facility.</li> </ul>
<p>In addition to the above, an assessment of the application has revealed a number of discrepancies within the documents submitted to Council. The Applicant shall provide clarification regarding the following:</p> <ul style="list-style-type: none"> <li>• Reference is made within the application to reduce the number of accessible car parking spaces from two (2) to one (1). However, the submitted Architectural Plans indicate car parking spaces no. 6 and 7 are accessible parking spaces.</li> </ul>	<ul style="list-style-type: none"> <li>• During assessment of the Facility for the preparation of the Traffic &amp; Transport Assessment Report for Proposed Additional Capacity and Increased Hours of Operation for Gross Pollution Trap Facility (Transport &amp; Urban Planning, Appendix I), it was noted that the accessible car spaces had not been used for their intended purpose since commencement of site operations in 2015, hence the request to reduce these from two to one space. These spaces (No's 7 &amp; 8) on the submitted architectural plan, are an inconsistency in our documentation. The correct number of car spaces are shown in Figure 3 in the Traffic Report Appendix I (car space No 7). No off-site car spaces are required.</li> <li>• As above, the correct number of car parks at 6 Sleigh Place is twenty three (23), not twenty four (24).</li> </ul>



<ul style="list-style-type: none"> <li>Reference is made within the application that there are car parking spaces for twenty-three (23) staff and two (2) visitors. However, the submitted Architectural Plans indicate there are twenty-four (24) car parking spaces.</li> <li>Figure 3.6 - Site Operations Plan, of the submitted Environmental Impact Statement, prepared by Mainstream Recycling, dated November 2023, appears to be outdated and reflects the previous layout of the site.</li> </ul>	<ul style="list-style-type: none"> <li>We acknowledge and apologise: Figure 3.6 - Site Operations Plan, of the submitted Environmental Impact Statement, prepared by Mainstream Recycling, dated November 2023, is outdated. Plans will be updated and corrected as part of the review of the Operations and Waste Management Plans.</li> </ul>
<b>Environment Protection Authority (EPA) Referral</b>	
<p><b>Further Information Required:</b> The information provided regarding the waste including the waste management and handling procedures is at a minimal level and is not sufficient. The EPA expects detailed information to be provided for an application of this nature to be able to adequately assess the environmental impacts. The supporting documentation provided with the DA contains minimal information regarding the waste type and waste management and handling procedures of <b>street sweeper waste</b>. It is insufficient and the EPA expects detailed information to be provided with an application of this nature.</p>	<p>Mainstream Recycling has withdrawn the street sweeping waste component from its application.</p>
<p><b>Waste type and waste management and handling processes</b> (The proponent is proposing to accept 4000 tpa of street sweeping waste).</p>	<p>As above. Current processes and procedures at the site are for processing of gross pollutant stormwater trap and associated waste: the proposal is for a continuation and amplification of this waste stream, not street sweeping waste.</p>
<p><b>The EPA notes that the EIS advises that, if necessary, sawdust is added during the</b></p>	<p>Sawdust (wood waste) is used as required as a blending medium to enhance processing by the existing equipment. Typically this is sourced from brokers, who</p>



<b>resource recovery process to allow conveying of material.</b> The EPA requires additional information regarding this practice and the sawdust itself.	procure the material from various timber mills depending on the prevailing market conditions. These mills include Wagga, Tumut, Kempsey, and currently Mt Gambier. All saw dust material is from the milling of trees and is previously unused. Further specific information can be provided.
<b>No resource recovery order or exemption</b>	As noted above, Mainstream Recycling withdrew its application for street sweeping waste, and for a specific Resource Recovery Order for street sweeping waste in 2023.

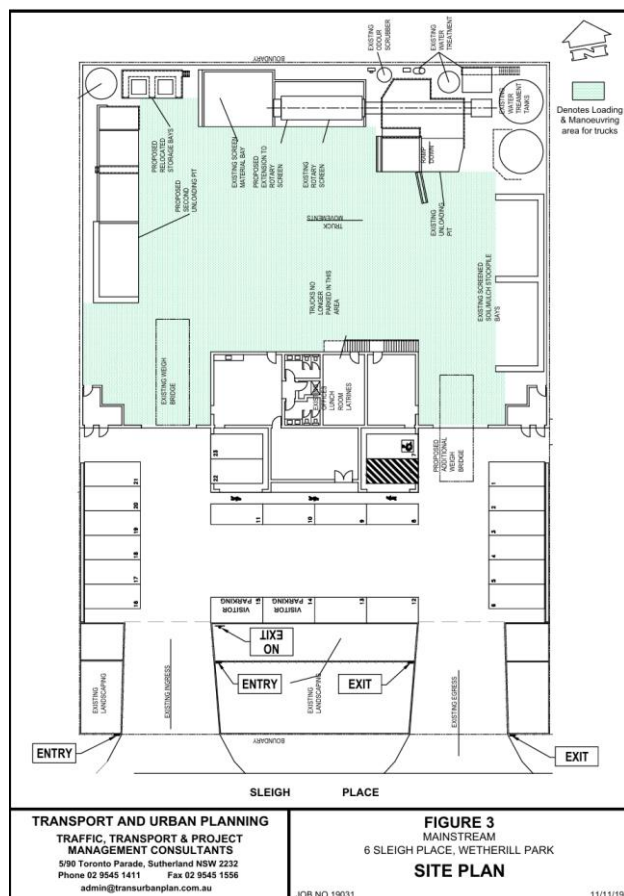



Figure 3: Traffic & Transport Assessment Report for Proposed Additional Capacity and Increased Hours of Operation for Gross Pollution Trap Facility (Transport & Urban Planning, EIS Appendix I). This set out the twenty three (23) car spaces on site. Note also DDA car spaces (No 7) and visitor car spaces (no's 14 & 15). No off -site car parking proposed or required.



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Job No. 1874

Owner / User Details

Test Report No. F62405-1874-01

Test Date 1/05/2024

Name

MAINSTREAM RECYCLING

Address

6 SLEIGH WETHERILL PARK NSW 2164

Instrument Address

6 SLEIGH WETHERILL PARK NSW 2164

Contact Name

Tiaan Reader

Contact Phone No.

0433 884 447

Instrument Details

Accuracy Class III

Min 0.4

Max 40

FSI (g) 0.02

BRV No 60/206

Manufacturer RWS

Model RW-1

Instrument Serial No 160116

Description INBOUND WEIGHBRIDGE

Aux Device Serial No T220900582

Units t

MMI Number

Basework 6/10B/52B

Indicator/s

5621

Load Cells

5638

Model Number

Basework RWS RW-1

Indicator/s

GEDGE SYSTEMS G5600

Load Cells

GEDGE HERCULES 2

Test Details

Available Standard masses 20 t

MPE Change Points 10t / 40t

Makeup of Substitution Loads

SUB 1 SUB 2 SUB 3 SUB 4 SUB 5

Method A X Method B N/A

Eccentricity - clause 5.2 No of Supports 4 Load 13 t

Repeatability - clause 5.1

P1 13.00 t P2 13.00 t P3 12.98 t P4 12.98 t

1st reading 33.90 t

2nd reading 33.90 t

3rd reading 33.90 t

Difference <1.0e t

PASS

PASS

Weighting Performance - clause 5.4

UP	Make up of load	Load Applied	Indication	$\gamma_e$	$\Delta L$	Error	MPE	Value of $L_{ub}$	Rounding	$L_{ub}$ (rounded)	Result (PIF)
A	MASSES	0.4	0.40	0.01	0.010	0	0.01				P
B	MASSES	5	5.00	0.01	0.010	0	0.01				P
C	MASSES	10	10.00	0.01	0.010	0	0.01				P
D	MASSES	20	20.00	0.01	0.010	0	0.02				P
E	SUB 1	LOADER & FORKLIFT	19.86	0.01	-	-	0.02	19.87	0.01	19.88	P
F	SUB1+20t		39.88	0.01	0.003	0.007	0.02				P
G											
H											
I											
J											
K											
L											
M											
N											
Down	SUB1+20t	39.88	39.88	0.01	0.003	0.007	0.02				P
	MASSES	20	20	0.01	0.01	0	0.02				P
	MASSES	10	10	0.01	0.01	0	0.01				P
	MASSES	5	5	0.01	0.01	0	0.01				P
	MASSES	0.4	0.4	0.01	0.01	0	0.01				P

Visual Inspection (s1.3) PASS

Sensitivity (s1.6) NA

$E = 1 + \gamma_e \cdot \Delta L \cdot L$

Over Range Blanking (s1.4) PASS

Accuracy of Tare Setting (s1.7) PASS

$L_{ub} = L_{ub} + \gamma_e \cdot E$

Zero Setting (s1.5) PASS

Price Computation (s1.8) NA

Overall Result PASS

Discrimination (s1.9) NA

Auxiliary Devices (s1.2.19) PASS

Certifier Name Limuel Ebona


ID # NW03328

Signature

Comments

N/A

THE ABOVE MENTIONED RESULTS ARE DEEMED TO BE TRUE AND ACCURATE AT THE TIME OF TESTING ONLY



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Job No. 1874

Owner / User Details

Test Report No. F62405-1874-02

Test Date 1/05/2024

Name

MAINSTREAM RECYCLING

Address

6 SLEIGH WETHERILL PARK NSW 2164

Instrument Address

6 SLEIGH WETHERILL PARK NSW 2164

Contact Name

Tiaan Reader

Contact Phone No.

0433 884 447

Instrument Details

Accuracy Class III

Min 0.4

Max 40

FSI (g) 0.02

BRV No 60/206

Manufacturer RWS

Model RW-1

Instrument Serial No 61920

Description OUTBOUND WEIGHBRIDGE

Aux Device Serial No T220900652

Units t

MMI Number

Basework 6/10B/52B

Indicator/s

5621

Load Cells

5563

Model Number

Basework RWS RW-1

Indicator/s

GEDGE SYSTEMS G5600

Load Cells

GEDGE TITAN 2

Test Details

Available Standard masses 20 t

MPE Change Points 10t / 40t

Makeup of Substitution Loads

SUB 1 SUB 2 SUB 3 SUB 4 SUB 5

Method A X Method B N/A

Eccentricity - clause 5.2 No of Supports 4 Load 13 t

Repeatability - clause 5.1

P1 13.00 t P2 13.00 t P3 13.00 t P4 13.00 t

1st reading 33.90 t

2nd reading 33.90 t

3rd reading 33.90 t

Difference <1.0e t

PASS

PASS

Weighting Performance - clause 5.4

UP	Make up of load	Load Applied	Indication	$\gamma_e$	$\Delta L$	Error	MPE	Value of $L_{ub}$	Rounding	$L_{ub}$ (rounded)	Result (PIF)
A	MASSES	0.4	0.40	0.01	0.010	0.000	0.01				P
B	MASSES	5	5.00	0.01	0.010	-0.000	0.01				P
C	MASSES	10	10.00	0.01	0.014	-0.004	0.01				P
D	MASSES	20	20.00	0.01	0.010	0.000	0.02				P
E	SUB 1	LOADER & FORKLIFT	19.86	0.01	-	-	0.02	19.870	0.010	19.88	P
F	SUB1+20t		39.88	0.01	0.004	0.006	0.02				P
G											
H											
I											
J											
K											
L											
M											
N											
Down	SUB1+20t	39.88	39.88	0.01	0.004	0.006	0.02				P
	MASSES	20	20	0.01	0.01	0	0.02				P
	MASSES	10	10	0.01	0.014	-0.004	0.01				P
	MASSES	5	5	0.01	0.01	0	0.01				P
	MASSES	0.4	0.4	0.01	0.01	0	0.01				P

Visual Inspection (s1.3) PASS

Sensitivity (s1.6) NA

$E = 1 + \gamma_e \cdot \Delta L \cdot L$

Over Range Blanking (s1.4) PASS

Accuracy of Tare Setting (s1.7) PASS

$L_{ub} = L_{ub} + \gamma_e \cdot E$

Zero Setting (s1.5) PASS

Price Computation (s1.8) NA

Overall Result PASS

Discrimination (s1.9) NA

Auxiliary Devices (s1.2.19) PASS

Certifier Name Limuel Ebona

ID # NW03328

Signature

Comments

N/A

THE ABOVE MENTIONED RESULTS ARE DEEMED TO BE TRUE AND ACCURATE AT THE TIME OF TESTING ONLY

Weighbridge calibration test-records showing compliance (May 2024): certificates (x2, inbound/outbound) shown above.

Proposed Capacity Increase of Wetherill Park Resource Recovery Facility

22/05/2024

[illegible]

