Proposed Increased Processing Capacity Resource Recovery Facility 6 Sleigh Place, Wetherill Park. Mainstream Recycling

Environmental Impact Statement (Amended)

Revision B: September 2024

MAINSTREAM RECYCLING

Wild Environment Pty Ltd
PO Box 66, Annandale NSW 2038

Summary of Amendments: Rev B, Sept. 2024

This Environment Impact Statement (EIS) (Revision B, September 2024) has been amended to withdraw the application for continued consent to accept and treat street sweeping waste. Planning consent was issued on 1 July 2022 (MA 803.6/2014) to allow upto 4,000 tonnes per annum (tpa) of street sweeping waste within the 29,500 tpa throughput limit. No street sweeping waste was accepted at the Facility at 6 Sleigh Place Wetherill Park, and an application to NSW Environment Protection Authority (EPA) to amend Environment Protection Licence # 20694 to accept street sweeping waste was withdrawn.

This amended EIS seeks consent to increase throughput of stormwater and gross pollutant trap (GPT) waste from 29,500 tonnes per annum (tpa) to 65,000 tpa, primarily by extending operating hours to 24/7, comprising:

- ***Stormwater/GPT material: 64,000 tpa (34,500 tpa increase)***
- ***Wood waste (sawdust): 1,000 tpa (input to aid processing).***

Treated material will continue to be analysed in accordance with EPL #20694 and EPA Waste Classification Guidelines, then disposed to appropriately-licenced facilities. Treated liquid will continue to be discharged to sewer in accordance with Sydney Water Trade Waste Agreement (TWA #38666).

Note that the following operational management documents submitted in November 2023 with the initial submission have been superseded:

- ***App K PLA-TDG-MR-010-04 -Mainstream Operations Management Plan***
- ***App J Waste Management Plan***

A revised Waste Management Plan (PLA-TDG-MR-036-02 - Waste Management Plan) has been prepared and submitted via the Portal. Note that should this development application be approved, this draft Plan will be updated and finalised for the increased volume, and submitted as part of the NSW EPA EPL amendment application.

Architectural Plans, elevations and layouts have also been updated and submitted to the Portal since the initial application in November 2023. Inconsistencies have been clarified on the plans, however there are no building alteration or additions proposed or required for the application. Figures 3.4 and 3.6 have been delated, and replaced by a new Figure 3.4: Site Architectural Plans.

No changes to the supporting assessment studies have been made (air quality, noise impact, and traffic, access and parking), as assessment concludes there would be no material changes due to the withdrawal of the street sweeping waste component and replacement with stormwater waste of a similar nature.

SUMMARY

This Environmental Impact Statement (EIS) has been prepared to support the development application for Mainstream Recycling Pty Ltd (Mainstream Recycling) to increase the processing capacity of stormwater and gross pollutant trap (GPT) waste from 29,500 tonnes per annum (tpa) to 65,000 tpa at the existing Facility at 6 Sleigh Place, Wetherill Park NSW 2164.

Background

Mainstream Recycling is part of the Total Drain Group Pty Ltd and currently operates an approved Facility at 6 Sleigh Place Wetherill Park (Lot 78 DP 845746) which accepts and treats upto 29,500 tpa of stormwater and other similar waste. The treated material is transported to an appropriately-licenced facility in accordance with waste classification, with treated water discharged to sewer. The site is operated in accordance with the initial planning consent from Fairfield City Council in 2015 (MA803.1/2014) and NSW Environment Protection Authority (EPA) Licence No. 20694.

The existing Facility currently operates 0600h and 1800h Monday to Friday, 0600h and 1300h Saturday, and at no time on Sundays and Public Holidays. It has been successfully operating since 2015, with no community contacts or complaints, and full compliance with all licence and operating conditions.

Proposed Development

This EIS assesses the cumulative impact for an amplification of processing capacity from 29,500tpa to 65,000 tpa, comprising:

- Stormwater/GPT material: 64,000 tpa (additional 34,500tpa)
- Woodwaste (sawdust): 1,000 tpa (to enhance processing)

The Facility has planning consent to accept and treat up to 4,000 tpa of street sweeping waste (MA806/2014) within the 29,500 tpa throughput limit. Steet sweeping waste treatment is no longer proposed for this application, and instead an additional 4,000 tpa of stormwater waste is proposed as part of the 65,000tpa throughput limit.

The increase in processed volume would be achieved by extending operating hours to 24/7, including Sundays and public holidays, thereby increasing processing efficiency from approximately 35% to 75%. Core processing hours would be 5.00am to 10.00pm, Monday to Saturday, with additional processing overnight, Sundays and public holidays during peak demand eg following heavy rain events which cause build up in stormwater and GPT devices.

The current approval allows the Facility to process up to 29,500 tonnes per annum (tpa) of general solid waste (non-putrescible). The two waste streams processed at the Facility comprise:

- Liquid waste from stormwater management systems
- General solid waste (non-putrescible) consisting of grit, sediment, litter and gross pollutants collected from stormwater devices and systems that has been dewatered so that it does not contain free liquids.

The treated material is transported to EPA-licenced facilities in accordance with NSW Waste Classification Guidelines, with treated water discharged to sewer and a small quantum of residual non-recoverable waste being disposed to landfill.

Key benefits of the Proposal to increase processing capacity to 65,000 tpa include:

- Meeting the demand for additional capacity for stormwater and similar waste processing within the Sydney metropolitan market;
- Increasing diversion of waste from landfill where appropriate (downstream processing by others in accordance with NSW EPA Resource Recovery Orders/Exemptions);
- Supporting the NSW Government's recycling targets, as well as the overall NSW landfill diversion target, where appropriate downstream processing and recycling by others is carried out;
- Maximising the resource recovery capacity of the Wetherill Park site to drive circular economy outcomes, and;
- Further integrate waste management activities on site to enhance internal operational efficiencies for processing waste.

Minimal environmental impact is anticipated as the proposed increase in capacity would not involve any changes to the site, building, internal layouts, plant and equipment, parking, access or loading areas/arrangements. Mainstream Recycling is however seeking approval for 24/7 access to the site, with the processing ramping up to 24/7. As demonstrated by the Acoustic Assessment (Section 6.4 and Appendix H), there are anticipated to be no adverse impacts on sensitive receivers from 24/7 operations.

Mainstream Recycling's primary customer is Total Drain Cleaning (TDC), with truck and truck-driver parking is provided by a long-term lease property at nearby Unit 2, 103 Cowpasture Road, Wetherill Park NSW 2164 (Lot 202/DP854677), with planning consent as a depot (DA193.1/2020).

The Facility currently processes 29,5000 tpa with ease, with plant and equipment operating at approximately 35% of rated capacity. Increasing capacity to 65,000 tpa would entail operating the Facility at approximately 75% capacity, which could be readily done using existing staff and processes. Existing storage and freeboard is available to provide contingency in the event of blockages, maintenance, breakdowns and peak demand.

The proposal entails installation of an additional carbon air filtration unit. No other alterations, excavations or vegetation clearing is required or proposed. Existing, proven, management systems would be updated as required for the increased capacity.

Assessment Process

The development application is to be assessed in accordance with Part 4 of the NSW Environmental Planning & Assessment Act *(1979).*

In accordance with Schedule 3 (Part 2, Clause 45) of the EP&A Regulation 2021, waste management facilities that have an intended handling capacity of more than 30,000 tonnes per year are classified as designated development. The proposed change, with an intended handling capacity of 65,000 tpa, is therefore designated development, and an Environmental Impact Statement (EIS) must be prepared.

The EIS has been prepared in accordance with the Secretary's Environmental Assessment

Requirements (Local SEAR's No. 1369) issued by NSW Department of Planning, Industry and Environment (DPIE) and other agency and statutory requirements. The application will be managed by Fairfield City Council.

The proposed changes are considered to be consistent with the aims of all relevant Environmental Planning Instruments for the Site, including Fairfield City Local Environment Plan (LEP) 2013 and Fairfield City Wide Development Control Plan (DCP) 2013.

Environmental Assessment

Avoiding odour, noise, traffic/parking and amenity impacts through a careful design and series of management measures are key features of this proposal. Noise, air quality and traffic/access/parking studies were carried out as part of the EIS process. The studies concluded there would be no adverse impacts, with the mitigation measures proposed.

An air quality assessment has been carried out by AirLabs (**Appendix G**) to assess potential odour impacts and compliance. The assessment modelled the increased capacity with an additional carbon air-filtration unit and concluded that the odour assessment criteria will be satisfied at the increased capacity, and will also enable operation of the Facility with the roller doors open during operational hours (24/7). Due to nature of the waste and processing plant, no dust or other particulate matter is anticipated to be generated.

An acoustic assessment has been carried out by Acouras (**Appendix H**) to assess potential noise impacts of the Proposal. The noise assessment concludes there will be negligible if any adverse noise impacts, including with the roller doors open during operation, and that the Proposal would comply with relevant EPA standards and Licence requirements. Mainstream Recycling is however seeking approval for 24/7 access to the site, with the processing ramping up to 24/7. As demonstrated by the acoustic assessment (Section 6.4 and Appendix H), there are anticipated to be no adverse impacts on sensitive receivers from 24/7 operations.

A transport, access, parking and internal manoeuvrability assessment has been prepared by Transport and Urban Planning (Appendix I) to assess the potential cumulative impacts of the Proposal at the Facility. 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 the Mainstream 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. This depot provides truck driver and truck parking (DA 193.1/2020). Should the situation arise in the future that TDC relocate, this would be independent of Mainstream Recycling's operations at 6 Sleigh Place.

The Traffic, Access & Parking Report (Appendix I) assesses the TDC truck depot as part of the cumulative assessment only. Mainstream Recycling (ABN 75 611 996 493) does not own or operate trucks, hence parking is only required at 6 Sleigh Place for staff and visitors. TDC and its operations is not part of this proposal.

This includes considerations of the existing traffic conditions surrounding the site, the traffic generating characteristics of the proposal, the suitability of existing access arrangements for the site and the transport impact of the proposal upon the surrounding road network. The assessment concluded there will result in no change to the Levels of Service of the existing intersections affected by the proposal, that adequate access and parking is available and provided, and the Facility has sufficient capacity for traffic, parking and internal manoeuvrability for the proposal.

Hazards and risk have been assessed for the Proposal including a preliminary risk screening

in accordance with State Environmental Planning Policy (Resilience and Hazards 2021). The Proposal does not propose any change to the storage, handling and transport of materials on the site, other than that associated with the increase in liquid wastewater handling. Findings of the risk screening identify that the volumes of materials classified as dangerous goods to be stored on-site are well below the screening thresholds (as identified in Applying SEPP 33) for their respective quantities. Furthermore all materials classified as dangerous goods will be located on the site appropriately in accordance with relevant safe storage practises. Based upon the preliminary risk screening and the assessment process, the Proposal is not considered potentially hazardous and a Preliminary Hazard Analysis is not required.

Conclusion

The environmental assessment concludes that the proposed increase in capacity would have negligible environmental and community impacts, would not be hazardous or offensive, and would not adversely impact on neighbouring land uses. The changes are concluded to be consistent with the requirements of relevant planning instruments, and would enable greater recycling across Sydney and within the Smithfield-Wetherill Park Industrial Estate.

The proposed development has been assessed in terms of the principles of ecologically sustainable development (ESD), as required by statutory and Mainstream Recycling's policy requirements. The proposed changes to the Facility are concluded to be justified in terms of the principles of ESD and in social, economic and environmental criteria, and will:

- Increasing diversion of waste from landfill where appropriate (downstream processing by others in accordance with NSW EPA Resource Recovery Orders/Exemptions);
- Provide benefits to the community and environment through the encouragement of recycling and cleaner production techniques;
- Provide benefits to government, construction and commercial liquid-waste generators by improving the processing and recycling capacity in a readily accessible location;
- Be compatible with current and future land use in the Smithfield-Wetherill Park Industrial Estate.

The proposed development is also concluded to fully comply with all legislative, statutory and policy guidelines of NSW Government and Fairfield City Council.

Revision B: Minor changes to the Summary have been made to reflect:

- **Withdrawal of the street sweeping waste stream, and increase to stormwater waste component, within the application's 65,000 tpa throughput limit; and**
- **Stating that downstream processing by others, in accordance with NSW EPA Waste Classification Guidelines and Resource Recovery Orders, may reduce volumes to landfill and beneficial reuse where appropriate.**

Project element	Summary of the Project
Site	6 Sleigh Place, Wetherill Park NSW 2164 (Lot 6 DP792007)
Waste Processing	Increase throughput capacity from 29,500 tpa to 65,000 tpa, primarily by extending operating hours to 24/7, comprising: • Stormwater/GPT material: 64,000 tpa (34,500 tpa increase) • Wood waste (sawdust): 1,000 tpa (input to aid processing). The Facility has planning consent to accept and treat up to 4,000 tpa of street sweeping waste (MA806/2014). Steet sweeping waste treatment is no longer proposed for this application, and instead an additional 4,000 tpa of stormwater waste is proposed as part of the 65,000tpa throughput limit. Residuals analysis in accordance with EPL #20694 and EPA Waste Classification Guidelines, then: • Disposed to appropriate landfill • GSW CT1 to appropriately-licenced facilities (and where appropriate, downstream processing by others for beneficial reuse in accordance with NSW EPA Resource Recovery Orders/Exemptions); • Treated and discharged to sewer in accordance with Sydney Water Trade Waste Agreement.
Building requirements	No building, excavation or vegetation clearing required. Installation of additional air quality control unit within existing building.
Community & Amenity	No changes to existing buildings. No adverse noise/vibration, air quality or amenity impacts anticipated.
Hours of Operation	24/7 access and operation within industrial area.
Transport, Traffic, Parking & Access	Refer attached Traffic and Transport report in Appendix I; no off-site parking required, or traffic impacts anticipated.

Certification	
Submission of environmental impact statement (EIS) Prepared under Environmental Planning and Assessment Act 1979 (Section 4.12)	
EIS prepared by:	Andrew Wild PO Box 66, Annandale NSW 2038
Qualifications	Bachelor Engineering
SEARs	#1369 – local SEARs
Site	6 Sleigh Place, Wetherill Park NSW 2164 (Lot 6 DP792007)
Description of the proposed activity to which the statement relates:	As set out above in Summary of the Project.
Environmental impact statement:	An environmental impact statement is attached addressing all matters in accordance with Part 4 of the Environmental Planning and Assessment Act 1979 (NSW).
Declaration:	I certify that I have prepared the contents of this environmental impact statement in response to the Secretary's environmental assessment requirements dated 11 December 2020 and the relevant provisions of Schedule 2 of the Environmental Planning and Assessment Regulation 2021. To the best of my knowledge the information contained in the environmental impact statement is not false or misleading.
Signature: Date:	 18/09/2024 (Revision B)

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INTRODUCTION

1.1 BACKGROUND

Mainstream Recycling Pty Ltd (Mainstream Recycling) currently operates a Facility at 6 Sleigh Place Wetherill Park (Lot 78 DP 845746) which accepts and treats stormwater and other liquid wastes. The treated material is transported off-site to appropriately-licenced facilities, with treated water discharged to sewer. The Facility is operated in accordance with the planning consent from Fairfield City Council in 2020 (MA803.4/2014) and NSW Environment Protection Authority (EPA) Licence No. 20694.

This Environmental Impact Statement (EIS) has been prepared by Wild Environment Pty Ltd prepared to support the development application for Mainstream Recycling to increase the processing capacity of the Facility from 29,500 tonnes per annum (tpa) to 65,000 tpa at the existing at 6 Sleigh Place, Wetherill Park NSW 2164.

This EIS has been prepared in accordance with the Secretary's Environmental Assessment Requirements (SEAR's No 1369) issued by NSW Department of Planning and Environment (DPE) and other agency and statutory requirements.

The site is located in the Smithfield-Wetherill Park Industrial Estate, south of the Prospect Reservoir, with Fairfield Local Government Area (refer **Figure 1.1**). The property is subject to a long-term lease agreement from Milana Corporated Pty Ltd (ACN 156479140), who have approve this proposal.

The Facility been operating successfully since 2015 and serves an important role in managing Sydney's waste, enabling recovery and re-use of by-products from industrial, commercial and residential markets that would otherwise be directed to sewer and potentially receiving waters.

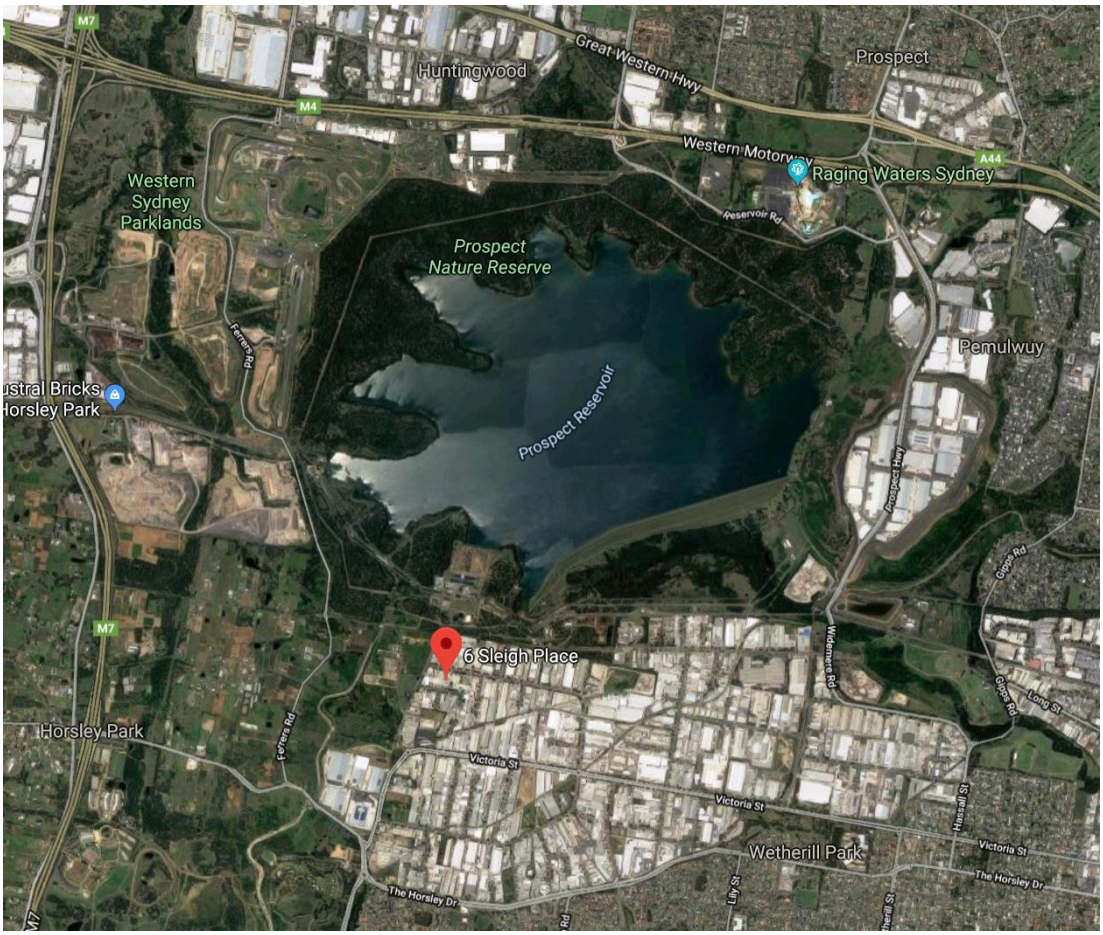

FIGURE 1.1: Site Location

1.2 OUTLINE OF THE PROPOSAL

Mainstream Recycling currently operates a recycling and transfer Facility at 6 Sleigh Place, Wetherill Park 2164.

This EIS assesses the cumulative impact of the proposed amplification of processing capacity from 29,500 to 65,000 tpa. The proposed changes to the Facility are:

- Increase operating hours to 24/7 (including Sundays and public holidays). Core processing hours would be 5.00am to 10.00pm, Monday to Saturday;
- Existing facilities and infrastructure to receive, store, treat, and load-out will be optimised for the increased capacity. An additional scrubber will be installed to improve air quality and enable processing with the roller doors open;
- Truck and truck driver parking for Total Drain Cleaning (TDC), primary customer of Mainstream Recycling, will continue to be off site at Unit 2, 103 Cowpasture Road, so staff motor car vehicle movements will not change. Trucks will commence and finish each day off-site, with truck and truck-driver parking provided at the nearby depot at Cowpasture Rd;
- Waste deliveries to the Facility will increase from ten (10) per day to 33 per day, as detailed in Section 6.6 and Appendix I;
- Waste removal from site will increase to four (4) per week from current one (1)

per week.

The description of the waste to be received and treated (all associated with stormwater facilities or stormwater management) is set out in refer **Table 3.2**.

The proposal includes enhanced mitigation measures as set out in Section 6 and 7 of this EIS.

No material changes or increase in off-site impacts would result from the proposal. The proposal would enhance the Facility's capability to safely meet Sydney's changing waste market by safely recycling material for beneficial reuse in accordance with NSW EPA Resource Recovery Orders.

1.2.1 The Proponent

Mainstream Recycling Pty Ltd (ACN 75 611 996 493) is a wholly-owned subsidiary of Total Drain Group Pty Ltd (TDG, ACN 621 479 981).

Mainstream Recycling is proudly Australian owned and operated and is wholly owned by the TDG. TDG hold ISO accreditation for its environmental, safety and quality management systems, based on its Sydney operations.

The primary customer of Mainstream Recycling's Facility is Total Drain Cleaning (TDC). TDC's leases a depot at Unit 2, 103 Cowpasture Road, Wetherill Park for truck and driver parking. Although this site and use is not subject to this proposal, the Traffic assessment (Section 6.6 and Appendix I) considers the depot as part of its cumulative assessment, and concludes there would be no adverse impacts.

Mainstream Recycling has successfully operated the Facility since 2015, and holds EPA Licence #20694 for its operation. Since holding the above licences, Mainstream Recycling has fully complied with its EPA licences requirements, and have had no complaints or non-compliances. Annual reports are available on NSW EPA's public register.

1.2.2 Need for Proposed Development

The proposal would enhance the Facility's capability to safely meet Sydney's changing waste market by treating additional stormwater waste, and enabling recycling of treated material by others for beneficial reuse by further processing where appropriate. Downstream processing by others in accordance with NSW EPA Resource Recovery Orders/Exemptions) would enable increasing diversion of waste from landfill where appropriate.

1.2.3 Project Schedule

Minor alterations to the building and odour management measures will commence immediately following receipt of development consent, construction certificate approval (if applicable), and all necessary permits and licences, and is anticipated to take approximately 4 weeks.

1.3 OBJECTIVES OF THE DEVELOPMENT

The primary objective of the proposed changes is to increase the capacity of the Facility to receive and process stormwater-related waste for the growing Sydney market.

1.4 ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

The proposed changes to the Facility are assessed under Part 4 of the *Environmental Planning & Assessment (*EP&A*) Act, 1979*. As the changes are defined as designated development, this EIS has been prepared in accordance with the Secretary's Environmental Assessment Requirements (SEAR's No.1369) issued by NSW Department of Planning and Environment (DPE) and other agency and statutory requirements.

The premises are located within the Smithfield-Wetherill Park Industrial Estate, and the sites are zoned E4 – General Industrial under Fairfield Local Environmental Plan (LEP) 2013. The proposed amendment is consistent with the currently approved land use and zoning. The site and proposed amplification have also been assessed with regard to Fairfield City Wide Development Control Plan (DCP) 2013. Consistency with these planning instruments is detailed in Section 4 of this EIS.

The proposed development is considered integrated development because a concurrent approval for a variation to the environmental protection licence for the existing Facility will be required from the NSW EPA.

1.5 STRUCTURE OF THE EIS

This EIS addresses the potential impacts of the proposed changes to the existing Facility on the physical, biological and social environment, describes the consultation process with stakeholders, agencies and the community as part of the development approval process and sets out safeguards to reduce any environmental effects. In accordance with the SEARs and statutory requirements, this EIS must the minimum form and content requirements of clauses 6 and 7 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2021.*

In addition to forming a basis for the assessment and approval of the proposed increase to the Facility, the EIS provides the community and government authorities with information on all aspects of the proposal. The EIS is divided into the following sections:

- **Section 1** – Introduction – provides an outline of the structure and purpose of the EIS as well as objectives of the proposed development.
- **Section 2** – Strategic Context – discusses the need for the proposal and provides a description of alternative sites and options.
- **Section 3** – Description of the Proposal – describes the proposed changes to the existing Facility.
- **Section 4** – Statutory Context – outlines the approvals process and the relevant legislative requirements that apply to the proposed development.
- **Section 5** – Engagement – provides details on the consultation process undertaken for this proposal.
- **Section 6** –Assessment of Impacts – describes the prevailing environmental characteristics and constraints of the site and locality being investigated and an assessment of the potential environmental impacts associated with the proposed development. Mitigation measures that will be implemented to reduce any potentially adverse impacts are also identified.
- **Section 7** – Management Systems and Project Justification – outlines the existing environmental and operational management plans and the amendments to these for the proposed changes. The conclusions and recommendations of the EIS are presented.

Supporting documents and specialist reports are provided as appendices to this EIS.

Revision B: No change to the Section 1, Introduction, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

2 STRATEGIC CONTEXT

2.1 NEED FOR THE PROPOSAL

2.1.1 Introduction

The existing Mainstream Recycling Facility at Wetherill Park serves an important role in the management of Sydney's waste by treating stormwater waste. This EIS assesses amplification of the Facility, primarily by extending operating hours.

2.1.2 Proposed Changes to the Existing Facility

The proposed change involves increasing the processing capacity of the Facility to cater for Sydney's growing volumes of stormwater and related waste products.

There will be no change to the current acceptance, processing or load-out processes. Treated waste material would be transported off-site to an appropriately-licenced facility, and treated liquid discharged to sewer, as is the current practice.

The proposed change would enable more stormwater and similar waste to be accepted, enabling the Facility to serve new and changing markets, and reduce the cost burden of waste management for Sydney's Council's, utilities and industries.

The proposed increase in capacity addresses the issue of finite liquid waste management resources in the Sydney region, consequently reducing environmental risks associated with liquid waste.

2.1.3 Strategic Fit with State and Regional Initiatives

The proposed changes are consistent with the NSW Government's current waste management framework focuses on reducing potential hazards to the environment and capturing value from materials that would otherwise be disposed of to landfill or sewer.

In particular the proposed increase in capacity delivers on the NSW Government's *Waste Avoidance and Resource Recovery Act (2001)* and takes into account the potential resource value and future use of materials in accordance with ecologically sustainable development (ESD) principles.

The NSW Waste and Sustainable Material Strategy 2041 identifies the need to significantly increase recycling and recovery rates from the commercial and industrial sector. The proposed changes will aid in further waste recovery and beneficial reuse.

On a local level, the proposed development is consistent with the objectives of Chapter 9 – Development Controls for Industrial Development in Fairfield City Council's City Wide DCP (2013) as the proposal supports and '*reinforces recycling and waste management principles*'.

The Wetherill Park location provides excellent access to arterial roads and motorways and is in good proximity to many of Sydney's industrial locations and infrastructure developments.

2.1.4 Benefits to Commercial and Industrial Industries

Commercial and industrial sectors are currently identified as the worst performers in waste avoidance, and they must increase their rate of resource recovery almost threefold in order to meet the targets set by NSW EPA.

The proposed changes will enable producers of waste within the infrastructure, utility, government, commercial and industrial waste streams both economic and cleaner

production advantages by being able to recycle their liquid wastes safely in an environmentally sustainable Facility. Recovered material can then be re-used for beneficial use in accordance with EPA classification and resource recovery orders, or land fill as appropriate.

Mainstream Recycling is predominantly a stormwater and management contract-service company, servicing thirty-eight local Councils, water authorities, road utilities, civil contractors and industry.

2.1.5 Conclusion

By reducing environmental harm associated with waste in accordance with the principles of ecologically sustainable development, the proposed development is consistent with NSW Government, Fairfield City Council, Mainstream Recycling's Corporate Policy and community expectations.

2.2 CONSEQUENCES OF NOT PROCEEDING

The principal alternative to the proposal is a "Do Nothing" scenario, whereby additional stormwater/GPT waste cannot be treated at the Facility, and this waste would be likely to be diverted to sewer, or costs to generators would increase due to limits in market capacity. This would result in:

- Further stress would be placed on finite, already limited recycling resources;
- The opportunity for contributing to reduction in contamination and volumes of material to sewers and receiving water's from landfill would be lost;
- Supply of materials suitable for downstream processing by others for appropriate beneficial reuse would be reduced;
- Community, Government and regulatory expectations for reducing waste as a valuable resource would not be met.

To not expand services offered at the existing Facility would see Mainstream Recycling become increasingly non-competitive, and limit market capacity to receive and the potential by others to downstream process and beneficially reuse stormwater waste.

Revision B: No change to the Section 2, Strategic Context, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

3 PROJECT DESCRIPTION

3.1 SITE LOCATION, LAND OWNERSHIP AND SITE SUITABILITY

The site is located in the Wetherill Park Industrial Estate on Lot 78 DP 845746, 6 Sleigh Place, Wetherill Park NSW 2164. This industrial estate is located approximately 35km west of Sydney CBD, south of the Prospect Reservoir. **Figure 3.1** shows the location of the Facility and the surrounding land uses. **Figure 3.2** shows the location of the Facility and adjacent neighbourhood.

The Facility site is owned by Milana Corporated Pty Ltd, who have approved this proposed development. Mainstream Recycling holds a long-term lease for the site.

Fairfield City Council issued initial development consent for the existing operation (GPT Waste Receival and Treatment Facility inside an existing building, Consent – No. 803.1/2014) in 2015. Site aerial photographs indicate that the site has not been structurally altered since that date. The existing landscaping, building and forecourt are in evidence before 2004.

Sleigh Place is a wide purpose-designed road with a wide grassed verge. Vegetation within the area consists of mature native trees of varying form and size. No biodiversity will be impacted by this proposal.

The adjoining properties, potentially impacted by noise, odour and traffic, are warehouses with associated heavy vehicle movements. These are:

- Immediately west of site: motor vehicle spare parts warehousing and distribution;
- Immediately east of site: body-building compounds warehousing and distribution.

The Facility is located on the northern side of Sleigh Place, with the building located at the rear of the block. No flooding or inundation has been experienced at the site, and Council's Section 149 certificate flood information indicates it is located above the 1-in-100 year ARI flooding level, and not subject to mainstream or overland flooding. Groundwater is at a depth of 5 metres below the site.

The site area is approximately 3,148 square metres. The waste processing building has a floor area of approximately 1,712 square metres, and is 36 metres deep and 48 metres wide.

The access drive into the Facility runs directly off Sleigh Place. The Facility has separate and wide ingress and egress. Tankers unloading waste enter the concrete-paved front apron, pass into the existing building (concrete slab floor, steel and galvanised panel walls) to unload, and loop though the building to egress through a separate roller-door exit to Sleigh Place. A mezzanine floor above provides modern office facilities for management/sales/administration staff, and a look-out over the processing area (refer **Figure 3.3 Street Frontage**).

On-site parking is ample (23 spaces) for staff and visitors, with an additional two (spaces) for disabled persons in accordance with AS 2890. Driveways and internal operation for trucks entering and exiting the Facility are fully compliant with Australian Standard AS2890.2. The existing car spaces and adjacent aisle widths are fully compliant with AS2890.1

The site is secured by a 1.8m man-proof fence, lockable gates, alarms, movement-activated flood-lighting, and security cameras. No change is proposed to this arrangement.

Figure 3.4 shows the existing site layout and traffic access. There will be no change to the footprint, area or elevation of site buildings as a result of the proposal.

The surrounding area is typical of industrial areas, with wide streets and a mix of light and heavy manufacturing, warehousing/distribution, and transport industries. Surrounding buildings are one-to-two stories, generally steel or concrete framed utilitarian industrial buildings. The nearest residential-zoned area is approximately 1.3 km south of the site: there are no residential dwellings in close proximity (although there is an isolated farm house on unzoned land at 28 Trivet St, Wetherill Park).

The heritage-listed Prospect Reservoir is located approximately 500m north of Sleigh Place, and a range of market gardens 100metres west. No impact from the proposal is anticipated upon these areas.

Access to the Wetherill Park Industrial Estate is via Cowpasture Road, Victoria Street, and Hassall Street. All provide wide carriageways and experience constant traffic flows over extended operating periods. Cowpasture Road is well serviced by major roads including The Horsley Drive to the South, the Cumberland Highway to the east, M4 to the north, and Prospect Highway/Westlink M7 to the west.

The truck parking depot used by TDC at 103 Cowpasture Road Wetherill Park is approximately 300 metres from the Facility, and provides dedicated truck and truck driver parking.

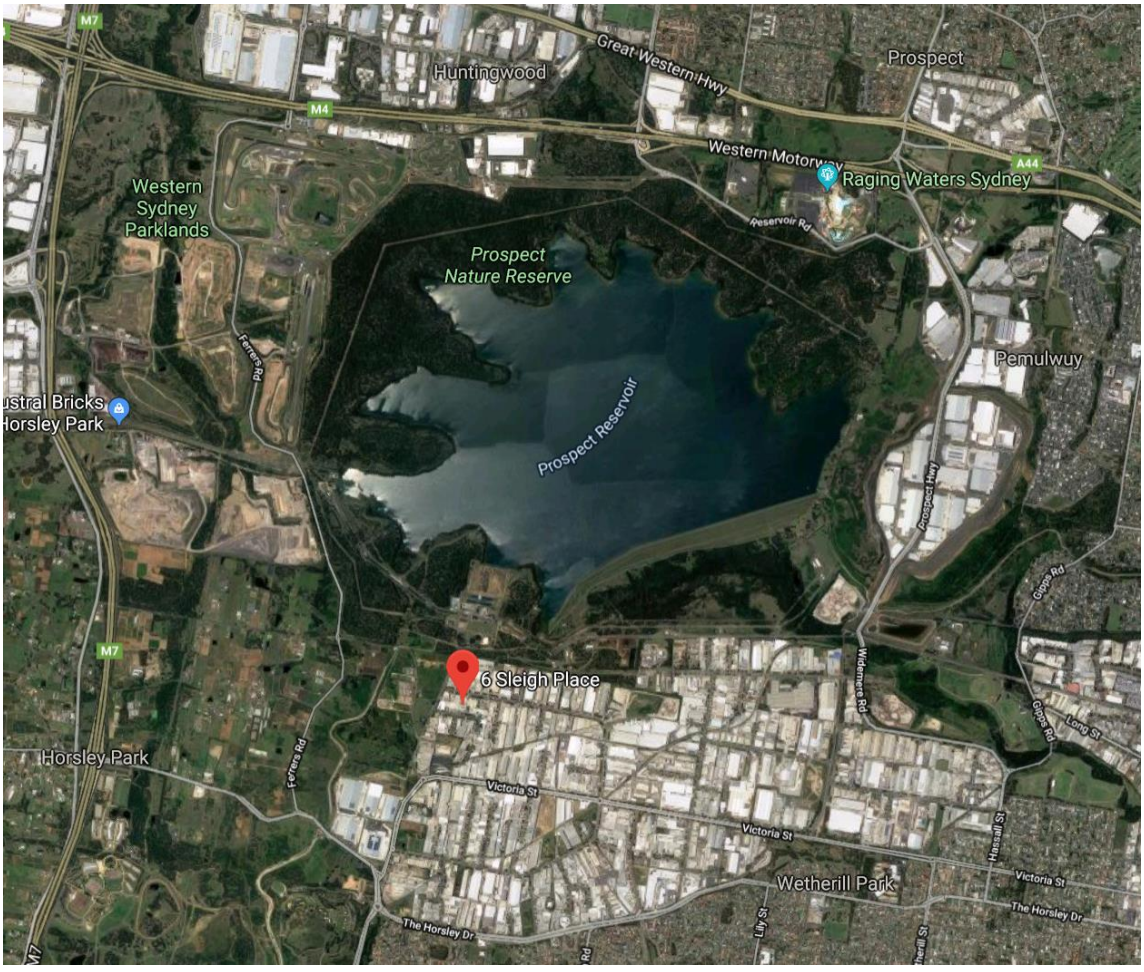

Figure 3.1: Site Location and Surrounds (google earth)

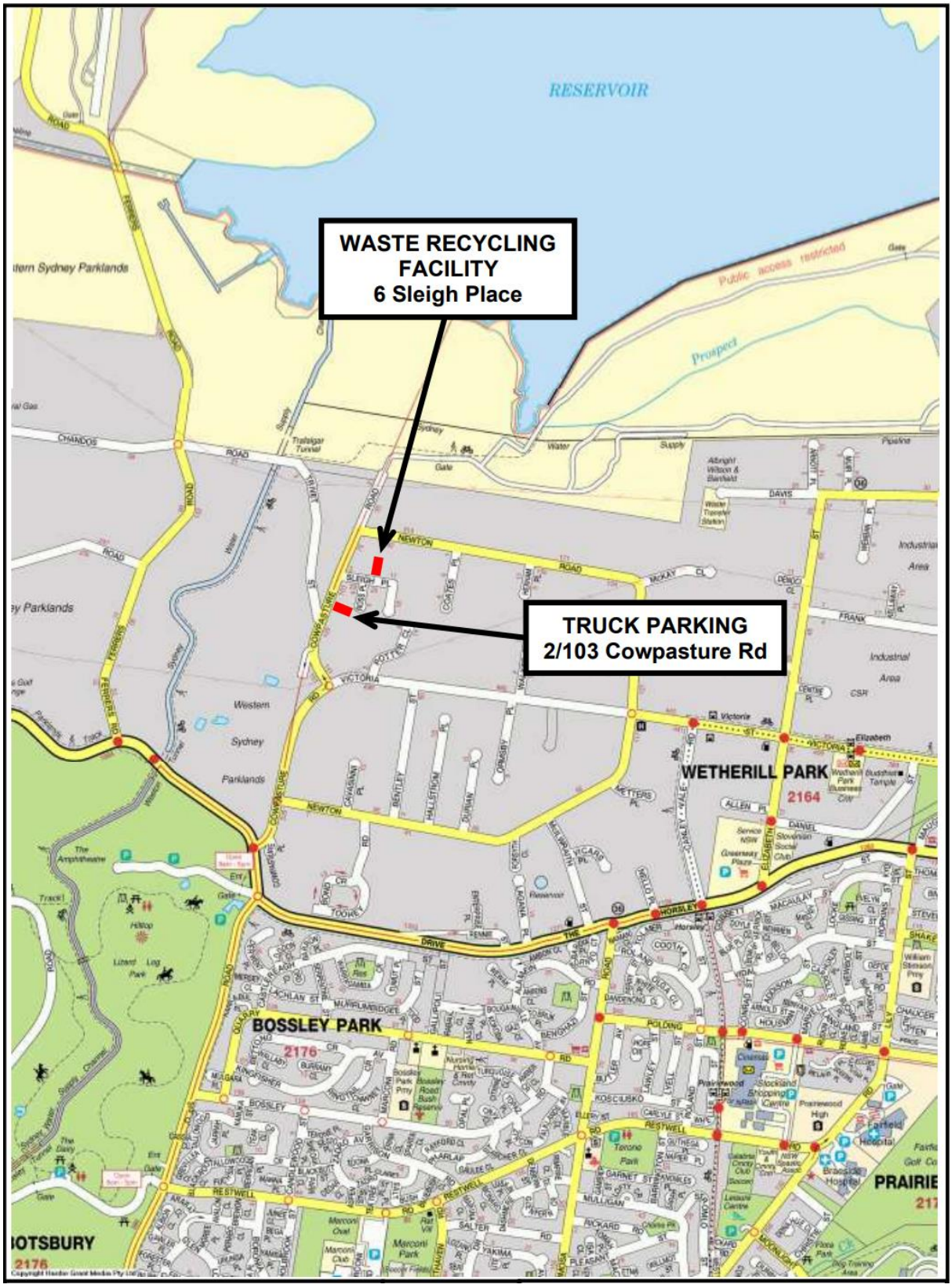

Figure 3.2: Recycling Facility and Truck Depot

Figure 3.3: Street frontage: 6 Sleigh Place

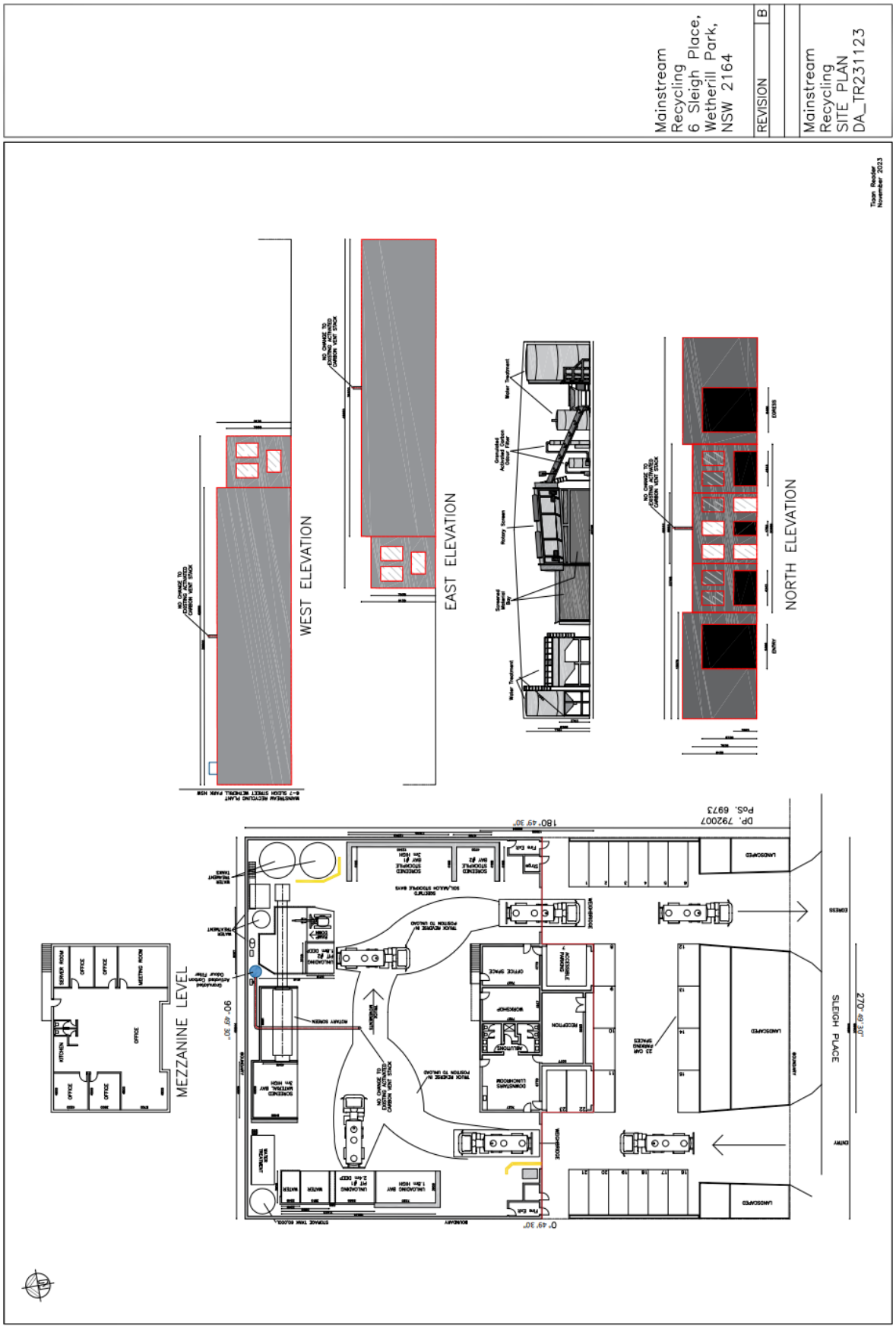

Figure 3.4: Site Architectural Plans (updated Sept. 2024)

Description of Existing Facilities

Operations of the existing Facility comprises the following steps:

- Waste materials are delivered to the Facility via vacuum road tankers and heavy-rigid trucks;
- Trucks and tankers discharge the waste into in-ground receival pits which settle out much of the solids;
- supernatant liquid is pumped off to large holding tanks, then treated by a plate separator or Dissolved Air Flotation (DAF) plant. The treated water is discharged to sewer in accordance with the Sydney Water Trade Waste Agreement;
- each holding tank is vented through an air scrubbing system, which is activated as required. The discharge exhaust fan has recently been upgraded to increase negative ventilation. Treated air is discharged to the atmosphere through a vent stack through the building roof;
- settled solids and other oversize residual material, including plastics, PET bottles and tree-bark, are removed from the bottom of the receival pits and stored in skips for removal to landfill;
- remaining solids are dewatered, then separated and sized over a rotating trommel screen. The recovered fines/mulch may be mixed with organic matter such as virgin saw-dust if required, then stored in skips for transport off-site.

The primary storage facilities at the site are:

- Bay 1 80t-120t Receival and/or mixing bay
- Pit 1 35t-50t Receival pit and solid/liquid separation
- Pit 2 35t-50t Receival pit and solid/liquid separation
- Pit 3 25t-40t Receival pit and solid/liquid separation

Since commencement of operations in 2015, Mainstream Recycling have installed the following minor improvements within the building to improve efficiency and environmental performance, and to meet more stringent regulatory and safety requirements:

- in-ground weighbridge with CCTV and electronic docketing system;
- containment area where waste is initially tipped;
- enhanced screening and separation units to improve processing and recycling effectiveness;
- sorting area to separate plastic from the final dewatered general waste;
- containment areas to store and hold waste ready for various treatment;
- additional liquid holding tanks to store treated liquid ready for transport and recycling/reuse;
- upgraded liquid treatment units to ensure ready compliance with Sydney Water sewer discharge standards, and to achieve a water quality suitable for off-site recycling (eg landscape irrigation, truck wash or wash-down water);
- optimised and improved odour control equipment;

- On-site laboratory for material analysis (complemented by off-site laboratory analysis quality assurance).

Since operation commenced, the Facility has demonstrated to provide that it:

- generates no adverse odour, vector/pest, traffic, parking, noise or amenity impacts on neighbours or residences;
- is a secure Facility that prevents illegal dumping, vandalism or uncontrolled public access. After-hours access via security swipe-card with CCTV;
- is secure from floods, stormwater and inundation;
- generates no adverse environmental impacts on groundwater, surface waters, soil or biodiversity.

The floor slab of the building is designed to capture all leachate prior to discharge to the existing Sydney Water sewer system. Water and spillage in the central area drains back to the in-ground receival pits. The water is treated via a water separator prior to discharge in accordance with the existing Sydney Water Trade Waste Agreement. Dust suppression sprinklers have been installed in the roof and suitable fire protection is in place. The entire processing hall is bunded, with roll-over bunds at the ingress and egress points.

The Facility is approved to receive and treat 29,5000 tpa of waste, 6 am to 6 pm Monday to Friday, and 6am to 1pm Saturdays (MA 803.6/2014). No processing is permitted on Sundays or public holidays. The Facility currently processes 29,5000 tpa with ease, with plant and equipment operating at approximately 35% of rated capacity. Increasing capacity to 65,000 tpa would entail operating the Facility at approximately 75% capacity, which could be readily done using existing staff and processes. Existing storage and freeboard are available to provide contingency in the event of blockages, maintenance, breakdowns and peak demand.

Table 3.1 sets out the existing waste types received, as listed in the Facility's EPA Licence No. 20694.

Table 3.1: Waste Descriptors (existing)

NEPM Code	Description	Waste Generation
N/A	Liquid waste from stormwater gross pollutant traps only	Waste storage Waste processing (non-thermal treatment)
N/A	Grit, sediment, litter and gross pollutants collected in, and removed from, stormwater treatment devices or stormwater management systems, that has been dewatered so that it does not contain free liquids	As defined in Schedule 1 of the POEO Act, in force from time to time. Waste storage Waste processing (non-thermal treatment)

Table 3.2 below sets out the on-site storage of liquids recovered from processing.

NEPM Code	Description	Waste Generation
J100	Waste Sump Oil & oil from	Storage only. This is generated from the Facility's oily

	stormwater	water separator (DAF) and from processing oily water waste. Transported off-site to specialist oil recyclers.
J120	Waste oil/water mixtures	Generated primarily from stormwater pits that have minor oil contamination, or when cleaning pipes/drains that have an oil or hydrocarbon residue

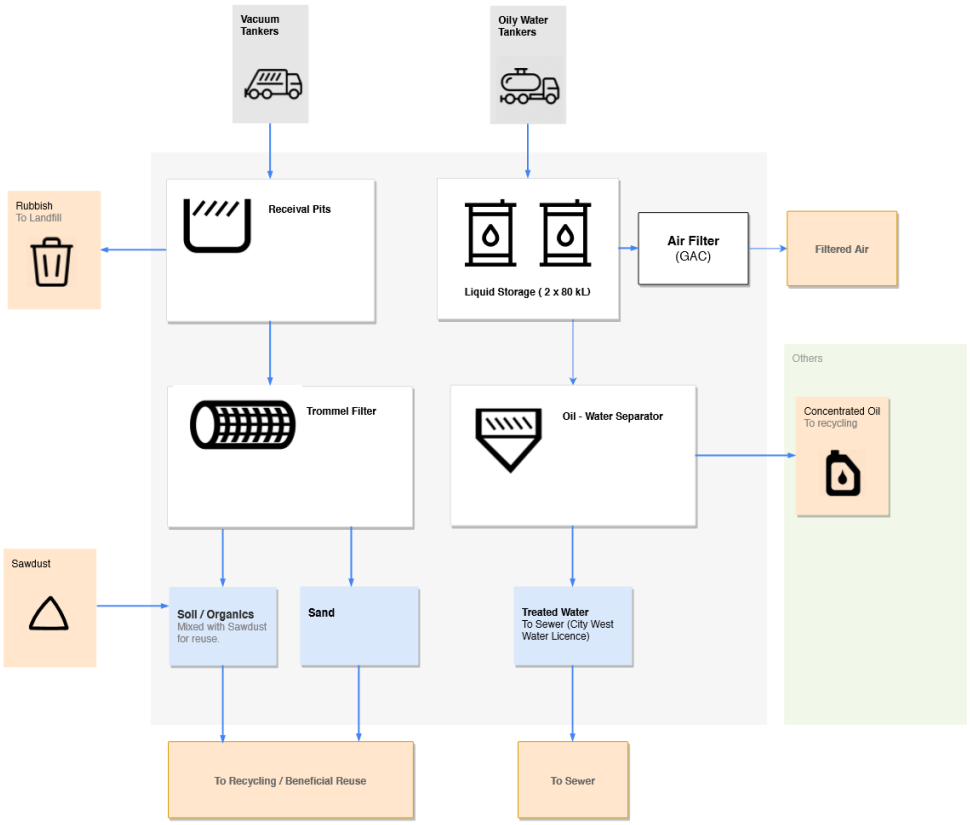

Figure 3.5: Existing and Proposed Process Flow Diagram

The entry and exit weighbridges are the primary locations on site for recording the receiving and removing of waste. Typically, the weighbridge reporting information includes the following:

- Date and time/Vehicle Registration (can be validated by CCTV and secure swipe pass)
- Customer
- Waste type (liquids, GPT waste etc)
- Gross and Tare Weight
- Weighbridge Management unique System Docket Number.

3.2 PROPOSED FACILITIES AND PROCESSES

The proposed capacity increase, from 29,500 tpa to 65,000 tpa, will be achieved through longer operating hours and more efficient use of the Site: no amplification or enlargement of existing processing or storage facilities will be required. Changes required from the existing operation to cater for the proposed capacity would be:

- Core processing hours would be 5.00am to 10.00pm, Monday to Saturday, with processing also to be carried out overnights, Sundays and public holidays during periods of peak demand eg following heavy rain events.
- Duplication of the existing activated-carbon scrubber system to achieve five (5) air changes per hour inside the Facility;
- Waste deliveries would increase from fifteen (15) HRV trucks per day to thirty-three (33) per day;
- Staff numbers at Sleigh Place to increase from fifteen (15) to twenty (20), with a reduction from two (2) to one (1) accessible parking space proposed as the accessible parks have never been required;
- Waste removal from site will increase from one (1) day per week to four (4) days per per week.
- Waste acceptance and storage requirements are set out in **Table 3.3** below.

NEPM Code	Description	Waste Generation	Volume
J100	Waste Sump Oil & oil from stormwater (UN no. 30XY)	Storage only. This is generated from the Facility's oily water separator (DAF) and from processing oily water waste. Transported off-site to specialist oil recyclers.	Upto 3,000 L storage
J120	Waste oil/water mixtures (UN Number 30XY)	Generated primarily from stormwater pits that have minor oil contamination, or when cleaning pipes/drains that have an oil or hydrocarbon residue.	Upto 3,000 tpa

Table 3.3: Waste Descriptors & Storage

In summary, processing capacity would increase to 65,000 tpa, comprising:

- Stormwater/GPT material: 64,000 tpa (additional 34,500tpa)
- Woodwaste (sawdust): 1,000 tpa (to enhance processing)

The Facility has planning consent to accept and treat up to 4,000 tpa of street sweeping waste (MA806/2014). Steet sweeping waste treatment is no longer proposed for this application, and instead an additional 4,000 tpa of stormwater waste is proposed as part of the 65,000tpa throughput limit.

The Facility receives wood waste in the form of sawdust that is utilised in the processing of other waste streams, which would not require development consent or EPA approval if the premises was unlicenced (i.e. the sawdust would be received for use under the current Mulch Resource Recovery Order & Exemption). The sawdust is used as required as a blending medium to enhance processing by the existing equipment.

Mainstream Recycling is seeking approval for 24/7 access to the site, with processing ramping up to 24/7 (including Sundays and public holidays). As demonstrated by the Acoustic Assessment (Section 6.4 and Appendix H), there are anticipated to be no

adverse impacts on sensitive receivers from 24/7 operations.

Operational Control & Waste Sampling

Stringent quality control processes would be applied in accordance with the current consent and EPA licence requirements, including analysis at Mainstream Recycling's on-site laboratory and verification at a NATA-accredited facility. During operations Mainstream will undertake batch sampling by collecting composite samples of the waste processed and testing each sample against approved criteria. The testing of all samples will be undertaken by laboratories accredited by the National Association of Testing Authorities (NATA), or equivalent.

All waste and processed material will be transported off-site following analysis in accordance with NSW EPA Waste Classification Guidelines 2014 (refer to Appendix J, Waste Management Plan). The Waste Management Plan, and all other management plans, will be updated as appropriate following approval, and the updated Plans submitted to NSW EPA to support the Licence amendment application.

3.2.1 Costs, Funding and Staging

The project capital cost for the proposed changes is approximately $95,000 and include the DA assessment costs and installation of a contingency activated carbon units for the air treatment system (refer Appendix E). It is anticipated that four (4) additional drivers will be required at full capacity (65,000 tpa). Installation of the duplicate scrubber will commence immediately following the receipt of development consent, Construction Certificate (if required), and EPL amendment.

3.3 AUXILLIARY FACILITIES

No change in auxiliary features, such as electricity, potable water, stormwater, trade waste or security will be required by the proposed changes.

The existing emergency and fire systems will not be altered by the proposed changes. These systems are inspected, audited, and updated annually in accordance with management system and insurance requirements, and reviewed as set out in Section 6.12 following approval.

Revision B: No change to the Section 3, Project Description, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

4 STATUTORY CONTEXT

The environmental and planning framework relevant to the proposed development can be categorised as:

- ***planning approvals framework*** - governs the planning approval process and generally derived from the *Environmental Planning and Assessment Act 1979* (EP&A Act).
- ***environmental planning instruments and strategy documents*** - establishes the matters for consideration for assessment of the proposal.
- ***environment protection legislation*** - determines the specific environmental approvals required for the proposal.

4.1 PLANNING APPROVALS FRAMEWORK

4.1.1 Environmental Planning and Assessment Act 1979

Development consent is required under Part 4 of the EP&A Act if an environmental planning instrument states that a project is permissible with development consent (refer to **Section 4.2.1.1** for a description of the permissibility of the proposed development under the Fairfield LEP 2013).

The proposal changes will therefore be assessed under Part 4 of the EP&A Act.

4.1.2 Environmental Planning and Assessment (EP&A) Regulation 2021

The Facility at Sleigh Place is zoned 'E4 - General Industrial' pursuant to Fairfield LEP 2013. The current approved use involves processing, treating and sorting waste to be transferred to other sites and is defined as 'a waste or resource transfer station' which is permissible in the E4 zone. The proposal does not seek to introduce any new activities on the site and activities on the site will remain substantially the same.

In accordance with Schedule 3 (Part 2, Clause 45) of the *EP&A Regulation 2021*, waste management facilities that have an intended handling capacity of more than 30,000 tonnes per year are classified as designated development. The proposed change, with an intended handling capacity of 65,000 tpa, is therefore designated development.

Secretary's Environmental Assessment Requirements (Local SEAR's No.1369, **Appendix A**) for the proposed change have been issued by NSW DPE (DPE) and include agency and statutory requirements. The assessment of this amplification proposal will be managed by Fairfield City Council.

Unit 2/103 Cowpasture Road, Wetherill Park 2164 (Building B, Lot 202 DP854677) is leased by TDC, the primary customer of Mainstream Recycling, to provide truck and truck-driver parking, administration, storage of small pipes and fittings, and amenities. The site is zoned E4 - Industrial and leased on a long-term basis. The site has a current consent for use as a truck depot (DA 193.1/2020). While this site and use are not subject to the proposal, it is considered in Section 6.6 and Appendix I of this EIS as part of the cumulative traffic assessment.

Part 3 of Schedule 3 of the *EP&A Regulation 2021* sets out the factors to be considered by a consent authority when considering if an alteration or addition do not significantly increase the environmental impacts of the existing or approved development. **Table 4.1** outlines the proponent's consideration of the factors to be

considered Part 3 of Schedule 3 of the *EP&A Regulation 2021.*

Table 4.1: Factors to be taken into consideration

	EP&A Regulation (2021) Part 3 of Schedule 3 requirement	**Summary of assessment**
The impact of the existing development having regard to factors including:		
(i)	Previous environmental management performance, including compliance with the conditions of any consents, licences, leases or authorisations by a public authority and compliance with any relevant codes of practice, and	The Facility has successfully operated for eight years, with an excellent record of environmental management and compliance. EPA licence conditions have been adhered to for the entire operating period. Full compliance with all conditions of consents, licences, leases and relevant codes of practice has been achieved. No complaints received.
(ii)	Rehabilitation or restoration of any disturbed land, and	No rehabilitation or restoration of disturbed or contaminated land is proposed or required.
(iii)	The number and nature of all past changes and their cumulative effects	Smithfield-Wetherill Industrial Estate is the largest industrial area in Sydney. The site itself has been operating as a waste recycling Facility for eight years. Since the original consent for the operation of the site, several key modifications have been approved: • Use of Unit 2/103 Cowpasture RD Wetherill Park as a truck depot (DA193.1/2020) • Modification 803.4/2014 to allow increase in capacity to 29,500 tpa with roller doors open. • Modification 803.6/2014 to allow upto 4,000 tpa of street sweeper waste within the 29,500 tpa capacity limit. The above modifications are considered minor and required no substantial alteration to the physical site, buildings or operational processes. The cumulative impact of these changes are assessed as negligible.
The likely impact of the proposed alterations or additions having regard to factors including:		
(i)	The scale, character or nature of the proposal in relation to the development, and	The proposed change will not alter the physical structure of the site. The acceptance of increased waste at the site will not require new buildings or structures. There will be no visual or scenic impacts to the surrounding locality from any of the minor changes.
(ii)	The existing vegetation, air, noise and water quality, scenic character and special features	The Facility is located in the Smithfield-Wetherill Park Industrial Estate. No change to building.

	EP&A Regulation (2021) Part 3 of Schedule 3 requirement	Summary of assessment
	of the land on which the development is or is to be carried out and the surrounding locality, and	There will be no impact on soils, receiving waters, flora, fauna or heritage. As waste processing has the potential to cause odour, noise and traffic impacts to surrounding neighbours, stringent operational controls would also apply. Mitigation is further discussed below.
(iii)	The degree to which the potential environmental impacts can be predicted with adequate certainty, and	Eight years of operation has enabled potential impacts to be predicted with a high degree of certainty. Techniques, standards and industry skills for predicting odour, noise and traffic are well established.
(iv)	The capacity of the receiving environment to accommodate changes in environmental impacts	No changes to the Facility's drainage, sewer, water or other site services are proposed. Sydney Water's discharge (Trade Waste) requirements has been reviewed and it is not anticipated that any changes will be required, due to the recent upgrade of the site's treatment unit.
Any proposals:		
(i)	To mitigate the environmental impacts and manage any residual risk, and	The increased waste stream would be managed to minimise potential impacts on adjacent and surrounding neighbours. Operational processes and management plans would be reviewed if required and training of all relevant staff would occur to ensure handling, sorting and transfer of waste was carried out to minimise odour.
(ii)	To facilitate compliance with relevant standards, codes of practice or guidelines published by the Department or other public authorities.	An amendment to the Facility's EPA Environment Protection Licence #20694 is required and would be sought following planning consent, and prior to changes to operations. Operation of the site would be in accordance with all Licence conditions. Codes of practice and guidelines for the handling and waste are well established and include: • WorkSafe *Storage and Handling of Dangerous Goods* • EPA *Waste streams, classifications and management recommendation*. • *Australian Code for the Transport of Dangerous Goods by Road and Rail (ADG Code)*. • *relevant Australian Standards and Occupational Health and Safety Guidelines.*

4.1.3 Integrated Development

The development is considered integrated development because a concurrent approval will be required from the NSW EPA under the provisions of Section 4.46 of the *Protection of the Environment (Operations) (POEO) Act 1997*. The Facility's existing EPA licence, EPL No 20694 will need to be amended for the proposed changes.

4.2 ENVIRONMENTAL PLANNING INSTRUMENTS AND STRATEGY DOCUMENTS

Under the EP&A Act, land development is subject to local, regional and state planning instruments, as outlined below.

4.2.1 Local Planning Instruments

4.2.1.1 Fairfield Local Environment Plan (2013)

The subject lands, Lot 78 DP 845746 and 202 DP854677, are zoned General Industrial Zone E4. The objectives of the zone and how the development meets those objectives are set out in the Table below.

Table 4.2: Consistency with Objectives of LEP 2013, Zone E4 – General Industrial

Objective	Consistency with Objective
To provide a wide range of industrial and warehouse land uses.	Proposed development is consistent with existing and permissible land uses within zone and surrounding areas. A broad range of industrial employment opportunities are encouraged by facilitating beneficial reuse of resources for reprocessing.
To encourage employment opportunities	Consistent with objective: will encourage employment directly (at Facility) and indirectly in related service businesses.
To ensure development is not likely to detrimentally affect the viability of any nearby business centre.	Not applicable: no impact
To minimise any adverse effect of industry on other land uses	Previous operations and assessed impacts of change conclude no adverse impacts on other land uses.
To support and protect industrial land for industrial uses.	Maintains valuable industrial use on existing Site, with no adverse impacts on surrounding industrial lands.

Zoning E4 - Industrial prohibits activities that are hazardous or offensive. This assessment assesses odour, noise, and amenity and concludes that there would be negligible adverse impacts, hence the proposal would not be considered offensive.

The proposed change is also concluded to not be hazardous, as discussed further in **Section 6.12**, and would therefore be permissible with consent.

There are no LEP principal development standards (eg lot size, height, FSR etc.)

controls relating to the Sites, nor is the land identified as having any heritage items located on it, or having acid sulphate soils, land slip or flood risk under the provisions of the LEP (refer to Table 4.3).

Table 4.3: Fairfield LEP 2013 relevant provisions

Provision	Consideration	Outcome
Zone E4 General Industrial	Proposal proposes a use permissible with consent in Zone	Complies
4.3 Height of buildings	No maximum height restrictions applied to the Sites. No building alterations proposed.	Not applicable
4.4 Floor space ratio	There are no maximum floor space ratio restrictions applied to the Sites.	Not applicable
5.10 Heritage conservation	There are no items of heritage significance relating to the Sites, or immediate surrounds	Not applicable
6.1 Acid sulphate soils	The Sites are not identified as being impacted by acid sulphate soils.	Not applicable
6.3 Flood planning	The Sites are not identified as being at or below the flood planning level.	Not applicable
6.5 Terrestrial biodiversity	The Sites are not identified on the Terrestrial biodiversity map as having biodiversity. No impacts on habitat, flora and fauna are considered further in Section 6.3.	Not applicable
6.6 Riparian land and watercourses	The Sites are not identified as a Riparian Area on the relevant map. No impact to receiving waters.	Not applicable

4.2.1.2 Fairfield City Wide Development Control Plan 2013

Fairfield City Wide Development Control Plan (DCP) 2013 provides detailed guidelines and standards that must be considered for all new development. Particular elements of the DCP of relevance to the proposed development include:

- Environmental Site Analysis (Chapter 3) – Specifically the requirements for submitting a DA and an outline of information to be included in an EIS.
- Development Control for Industrial Development (Chapter 9) – guiding principles for the development which are addressed in Table 2.4 below.
- Flood Risk Management (Chapter 11).
- Car Parking, Vehicle and Access Management (Chapter 12) – see Table 4.4.

Table 4.4: Fairfield City Wide DCP 2013 relevant provisions

Provision	Consideration	Outcome
9.2 Car parking, vehicle	Referral to NSW Roads and Maritime Services (RMS) for	Referral to the TfNSW

and access management	traffic generating development and controls relating to the requirements for car parking and vehicular site access.	has been made in SEARs. (Infrastructure) 2007. Refer also Section 6.6
9.4 Streetscape and amenity	Hours of operation, if more than 500m from residential areas, to be considered based on Acoustic Report.	More than 500m to nearest zones residential area. Refer Noise Impact Assessment in S6.5 & **Appendix H**.
11 Flood Risk Management	Sets out risk-management process and requirements for flood-prone land.	6 Sleigh Place is not subject to overland or mainstream flooding (S149).
12.1.1 Parking Rates	Resource Recovery Facility - To be determined by merit or a car parking survey of a comparable Facility	Ample parking and access. Refer to Section 6.6
12.2 Design Guidelines	Provides detailed design guidelines for car parking.	Refer to Section 6.6. The Proposal includes car parking which will comply with the design provisions.

4.2.2 State and Regional Plans

4.2.2.1 State Environmental Planning Policies

Consideration has also been given to applicable State Environmental Planning Policies (SEPPs) and other plans including:

- SEPP (Transport and Infrastructure) 2021
- SEPP (Biodiversity and Conservation) 2021
- SEPP (Primary Production) 2021
- SEPP (Resilience and Hazards) 2021
- NSW Waste and Sustainable Material Strategy 2041
- Planning for Bushfire Protection 2019

State Environmental Planning Policy (Infrastructure and Transport) 2021

Zone E4 General Industrial is a prescribed zone, and a resource recovery facility is defined as:

resource recovery facility *means a facility for the recovery of resources from waste, including such works or activities as separating and sorting, processing or treating the waste, composting, temporary storage, transfer or sale of recovered resources, energy generation from waste gases and water treatment, but not including re-manufacture of material or goods or disposal of the material by landfill or incineration.*

In addition, a resource recovery facility is defined as a type of waste or resource management facility under the following definition:

Waste or resource management facility *means a waste or resource transfer station, a resource recovery facility or a waste disposal facility.*

Under Clause 121 of the Infrastructure SEPP:

a) Development for the purpose of waste or resource management facilities, other than development referred to in subclause (2), may be carried out by any person with consent on land in a prescribed zone.

The Proposal is therefore in accordance with Clause 121 of the Infrastructure SEPP and is therefore permissible with consent.

In addition, Clause 104, in conjunction with Schedule 3, of the Infrastructure SEPP identifies resource recovery or waste transfer stations of any size or capacity as being traffic generating activity under Column 1 of Schedule 3. The provisions of this SEPP require the consent authority to give written notice of the development application and consider any responses received from the consent authority, in this case Transport for NSW (TfNSW).

SEPP (Biodiversity and Conservation) 2021

This SEPP aims to conserve vegetation in metropolitan areas. There is no remnant vegetation on Site, and no clearing or harm to landscaping vegetation is proposed as part of the development. Refer also to Appendix F.

SEPP (Primary Production) 2021

This SEPP aims to support and protect primary production in NSW. The subject Site is not currently or proposed to be used for primary production, and the proposed development will have no adverse impacts on primary production in NSW.

SEPP (Resilience and Hazards) 2021

This SEPP provides definitions for 'hazardous industry', 'hazardous storage establishment', 'offensive industry' and 'offensive storage establishment'. The definitions apply to all planning instruments, existing and future. The policy also requires specified matters to be considered for proposals that are 'potentially hazardous' or 'potentially offensive' as defined in the policy.

An assessment of the proposed development was undertaken using the methodology given in '*Applying SEPP 33, Hazardous and Offensive Development Application Guideline'*. The guidelines include a threshold screening test used to determine whether a development is potentially hazardous. The proposed changes were assessed as follows:

- Maximum quantities of dangerous goods do not exceed the screening thresholds for any class of good
- The transportation screening thresholds are not exceeded
- The development therefore does not fall within the definition of potentially hazardous industry.

The proposed changes have the potential to emit polluting discharges (primarily odour) that would cause a level of offence in the absence of control measures.

However, an air quality / odour study (see **Section 6.4** and **Appendix G**) concluded negligible impacts from the proposed changes and odour levels are predicted to comply with NSW EPA odour goals and standards. If impacts are controlled as

proposed, the development is concluded not to be offensive and should therefore be permissible within the zoning.

Further, public health and safety, and the occupational amenity of neighbouring land uses, will not be impacted by vectors due to extensive and rigorous controls as described in **Section 6.9.**

This EIS therefore concludes that the proposed changes would not exceed the screening test of the SEPP as potentially hazardous or offensive.

Under the contaminated land provisions of SEPP (Resilience and Hazards) it is necessary to establish if the Proposal is to be undertaken on land which has been declared or found to be contaminated, where rezoning of the land is proposed or where development contemplates a change of use. The Proposal does not propose a change of use, but an intensification and amplification of an existing authorised use. No excavation is proposed or required.

As set out in Section 6.2, the site is not listed on the NSW EPA's Contaminated Lands Register, and no excavation is proposed. Therefore, the contaminated land provisions of the SEPP (Resilience and Hazards) are not applicable.

NSW Waste and Sustainable Material Strategy 2041: provides targets for the reduction in waste to 2041. The objectives and targets of the Strategy are to:

- Avoid and reduce waste generation;
- Increase recovery rates and the use of recycled content
- Phase out problematic plastics
- Divert more waste from landfill, including halving the amount of organic waste to landfill;

The Strategy includes targets to increase recycling of municipal solid waste, and commercial and industrial waste by 2041. Increasing the capacity of the Facility will assist in the meeting of this target by providing the opportunity for downstream processing by others for beneficial reuse. It is considered the Proposal is consistent with the NSW Strategy 2041.

Planning for Bushfire Protection 2019 (Fire and Rescue NSW): provides development standards for developing and building on bushfire-prone land in NSW. In conjunction with Fire and Rescue NSW, *Fire Safety Guideline – Fire Safety in Waste Facilities (*2020*),* the development has been assessed in Section 6.12 and concludes that the proposal will comply with all requirements of the guidelines.

4.3 ENVIRONMENTAL LEGISLATION

4.3.1 NSW State Legislation

4.3.1.1 Protection of The Environment Operations Act 1997

The *Protection of the Environment Operation Act (POEO) 1997* aims to protect, restore and enhance environmental quality, decrease risks to human health and prevent the degradation of the environment. The Act provides for the regulation of noise, air and water pollution and waste management.

Waste facilities are a scheduled activity under the Act, and as such require an Environment Protection Licence (EPL) from NSW EPA, which set conditions that must be followed during operation. The proposed changes will require EPA approval of a variation to existing EPL No. 20694 for the existing Facility.

4.3.2 Commonwealth Legislation

No Commonwealth legislation is considered to be applicable to this proposal. No impacts on biodiversity are anticipated by this proposal, hence no referrals for consideration under the Commonwealth *Environment Protection and Biodiversity Conservation Act* 1999 are considered necessary.

4.3.3 Other Agency Requirements

Relevant agencies have been consulted for this and previous recent proposals. Specifically Fairfield City Council was consulted with a pre-DA submission for this proposal, and will be consulted during the EIS consideration process.

Construction and operation of the proposal would be required to be consistent with EPA General Terms of Approval, and be subject to Sydney Water Section 73 Compliance, and relevant fire safety and construction certification to verify compliance with the planning consent and BCA requirements.

4.4 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)

DPIE issued the project local SEARs in August 2019, and following a request for amendment, revised SEARs on 11 December 2020. The SEARs were extended in 2023. **Table 4.5** presents a summary of the general requirements and key issues to be addressed in the EIS in accordance with the SEARs, and identifies where each requirement is addressed in this EIS. A detailed compliance table of the SEARs is included in Appendix A.

Table 4.5 Secretary's Environmental Assessment Requirements (No. 1369)

Secretary's Environmental Assessment Requirements	Reference within EIS
General Requirements	
The Environmental Impact Statement (EIS) for the development must meet the form and concept requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2021.	**This EIS and Appendices**
The EIS must include an assessment of all potential impacts of the proposed development on the existing environment (including cumulative impacts if necessary) and develop appropriate measures to avoid, minimise, mitigate and/or manage these potential impacts. As part of the EIS assessment, the following matters must also be addressed:	
Strategic context – including:	
- a detailed justification for the proposal	Section 2
- a demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, development control plans (DCPs), or justification for any inconsistencies	Section 4
- a list of any approvals that must be obtained under any other Act or law before the development may lawfully be carried out	Section 4
- a description of any additional licence(s) or approval(s) required to carry out the proposed development.	Section 4

Suitability of the site – including:	Sections 3 & 6
- a detailed justification that the site can accommodate the proposed increase in capacity, having regard to the scope of the operations and its environmental impacts and relevant mitigation measures	
- a detailed site plan and floorplans depicting the proposed internal layout, including the location of machinery and equipment.	Section 3
Waste types and management – including:	
- details of the type, classification, quantity, source, maximum volume and throughput of waste to be received at the site	Section 3 &
- detailed description of waste processing procedures for each type of waste	Section 6.10
- details of the resource outputs and any additional processes for residual waste	
- details of waste handling including, transport, identification, receipt, stockpiling and quality control	
- the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the NSW Waste and Sustainable Material Strategy 2041.	
Soil and water – including:	
- a description of local soils, topography, drainage and landscapes - details of stormwater, leachate, and wastewater management	
- details of sediment and erosion controls	Section 6.2
- consideration of the impacts to surface and groundwater resources, flooding impacts, and impacts to groundwater dependant ecosystems as a result of the increase in processing	
- a description and appraisal of impact mitigation and monitoring measures.	
Air quality and odour – including:	
- a description of all potential sources of air and odour emissions	
- an updated air quality impact assessment and odour impact assessment in accordance with relevant Environment Protection Authority guidelines	Section 6.4
- a description and appraisal of air quality and odour impact mitigation and monitoring measures.	
Noise and vibration – including:	
- a description of all potential noise and vibration sources, including increased processing and truck movements	
- an updated noise and vibration assessment in accordance with the relevant Environment Protection Authority guidelines	Section 6.5
- a description and appraisal of noise and vibration mitigation and monitoring measures	
Traffic and transport – including:	
- details of road transport routes and access to the site	Section 6.6

- road traffic predictions for the development during operation - an assessment of impacts to the safety and function of the road network and the details of any road upgrades required for the development. **Hazards and risk** – including: - a preliminary risk screening completed in accordance with SEPP 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011).	Section 6.12
Fire and incident management – including: - technical information on the environmental protection equipment installed on the premises such as air, water and noise controls, spill clean-up equipment, fire management (including the location of fire hydrants and water flow rates at the hydrants) and containment measures - details of the size and volume of stockpiles and their arrangements to minimise fire spread and facilitate emergency vehicle access - an assessment of the risk of bushfire, including addressing the requirements of Planning for Bush Fire Protection 2019 (RFS). Any proposed Asset Protection Zones must not adversely affect environmental objectives (e.g. buffers).	Section 6.12
Biodiversity – including: a description of any potential vegetation clearing needed to undertake the proposal and any impacts to flora and fauna.	Section 6.3 Section 6.8
Visual – including: a description of the private receptors and public vantage points.	Section 6.7
Heritage – including: - Aboriginal and non-Aboriginal cultural heritage.	
Environmental Planning Instruments and other policies	
The EIS must assess the proposal against the relevant environmental planning instruments, including but not limited to: • SEPP (Transport and Infrastructure) 2021 • SEPP (Biodiversity and Conservation) 2021 • SEPP (Primary Production) 2021 • SEPP (Resilience and Hazards) 2021	**Section 4**

• Fairfield City Council Local Environmental Plan 2013	
Guidelines	
During the preparation of the EIS you should consult the Department's Register of Development Assessment Guidelines which is available on the Department's website at https://www.planning.nsw.gov.au/Assess-and-Regulate/Development-Assessment/Industries. Whilst not exhaustive, this Register contains some of the guidelines, policies, and plans that must be taken into account in the environmental assessment of the proposed development.	**This EIS & Appendices**
Consultation	
During the preparation of the EIS, you must consult the relevant local, State and Commonwealth government authorities, service providers and community groups, and address any issues they may raise in the EIS. In particular, you should consult with the: • Environment Protection Authority – Waste • Roads and Maritime Services (TfNSW) • Fairfield City Council • surrounding landowners and occupiers that are likely to be impacted by the proposal	**Section 5**

4.5 CONCLUSION

All relevant statutory instruments have been considered in the concept development and assessment of this proposal. It is considered that all matters have been addressed where applicable, and that the proposal fully complies with the objectives and requirements of all relevant statutory instruments.

Revision B: No change to the Section 4, Statutory Context, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

5 ENGAGEMENT

Mainstream Recycling embraces the principles of sustainable development, and actively seeks input and involvement from the wider community. Mainstream Recycling are committed to early engagement of all interested stakeholders and parties potentially affected by the development, and a consultation strategy has been implemented to provide information and gain feedback.

5.1 CONSULTATION PROGRAM

A list of the organisations contacted and issues raised is provided in **Table 5.1**.

Table 3.1: Stakeholder Consultation

Organisation Consulted	Date Consulted	Comments	EIS Section
Fairfield City Council (pre-lodgement meeting)	26 June 2018, 2020/2021 during MA803.6/2014 assessment.	• Odour, noise, traffic/access/parking assessment reports required	**This EIS Appendices**
NSW Dept. of Planning & Environment (DPE)	August 2019, Nov/Dec 2020, June 2023	• Consultation during submission of Scoping Report and request for SEARs • Refer to Portal and Appendix A for SEARs	**This EIS Appendix A**
NSW Environment Protection Authority (EPA)	2020/2021 & 2023 during MA803.6/2014 assessment & subsequent EPL discussions.	• Requires EPA Licence amendment • Site Resource Recovery Order/Exemption (RRO/E) not proposed. • Waste handling details and procedures.	**This EIS. EPL #20694 to be updated upon consent.**
Transport for NSW (TfNSW)	2020/2021 & during MA803.6/2014 assessment	• Consultation during submission of Scoping Report and request for SEARs	**This EIS Appendix I**
Immediate Neighbours	2019-2023 15/09/23.	• No initial objections • Primarily day-shift operations, so no issues with extended operating hours	**This EIS Appendices**

Revision B: No change to the Section 5, Engagement, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6 ASSESSMENT OF IMPACTS

6.1 LAND USE AND ENVIRONMENTAL SETTING

6.1.1 Existing land use

The Facility is located at 6 Sleigh Place, Wetherill Park NSW 2164 (Lot 78 DP 845746), with a truck and truck-driver parking Depot at Unit 2/103 Cowpasture Road Wetherill Park 2164 (Lot 202 DP854677). The sites are located in the Smithfield-Wetherill Park Industrial Estate, which is characterised by 24/7 industrial and transport operations.

The nearest residential area is approximately 1.3 km to the south, although an isolated farmhouse is located approximately 250m south-west on unzoned land. A map of surrounding land uses is provided in **Figure 5.3**.

The sites are zoned E4 – General Industrial in accordance with *Fairfield Local Environment Plan (LEP) 2013*. As set out in Section 2.2., this proposal complies with the objectives and requirements of this zoning.

6.1.2 Construction impacts

No temporary construction impacts are anticipated due to the minor nature of alterations required (installation of standby activated carbon unit at Sleigh Place).

6.1.3 Operational impacts

Potential impacts on surrounding land uses may result from the increased acceptance and processing of waste and the potential odour, noise and traffic impacts from their handling at the Facility.

The proposal has been assessed for consistency with the planning objectives for the zone (Section 4.2) and compatibility with existing land uses and concluded to have negligible impact on current or future land uses.

The amenity for neighbouring properties may be impacted from potential odours from the site. As described in Section 6.4 potential odour impacts will be managed to minimise odour at the source and off-site. As the proposed development changes will be undertaken within an established industrial estate, it is not anticipated to be any direct impacts on the surrounding land uses.

Revision B: No change to the Section 6.1, Land Use and Environmental Setting is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6.2 WATER QUALITY, DRAINAGE AND SOILS

6.2.1 Existing Environment

The Facility is located in the Wetherill Park Industrial Estate which forms part of the upper catchment for the Georges River. The site's processing is completely enclosed inside a building on a fully sealed hardstand area with the exception of the landscaped areas along the boundary adjacent to Sleigh Place. All water that falls on hardstand at the site is captured within one of two catchments. The two catchments comprise, the external areas such as the building roof, carpark and entrance/exit driveways, and the internal area within the processing building the entirety of which

has been adapted to act as a bund. Water flows between these areas are physically separated by a trafficable bund at each of the roller doors.

Surface water runoff from the driveways, parking area and roof runoff are directed to the existing stormwater system via a number of stormwater pits. All stormwater drains have been fitted with drain wardens to capture gross pollutants from external areas e.g. litter. The stormwater pits drain to a central gross pollutant trap prior to discharge. This GPT is cleaned weekly, or as required, by vacuum truck. The internal areas of the Facility are graded to drain to the in-ground waste receival pits or directly to the leachate management system. Runoff within the waste receival pits is collected at a low point sump where it is pumped to the water treatment system. The existing water treatment system consists of primary settling and oil/water separation. Treated liquid is disposed of to sewer in accordance with the requirements of a current Sydney Water Trade Waste Agreement. This agreement includes testing requirements prior to discharge to which Mainstream Recycling is compliant.

The existing water treatment system consists primarily of pH control, settlement and oil/water separation. The capacity of the treatment system exceeds the current and proposed requirements: the system has ample additional capacity to treat additional water runoff from the proposed increase in volume of waste to be managed.

As described above all the works will take place on sealed hardstand. No excavation or other disturbance of the soils underlying geology is required.

6.2.2 Construction impacts

The installation of the additional activated-carbon duplicate scrubber will have no impact on the existing water cycle management and treatment system. No excavation would be required, hence no anticipated impacts from urban salinity, contamination or receiving waters.

6.2.3 Operation impacts

Operational impacts from the acceptance of increased waste volumes are considered to be negligible as all handling and transfer of liquid waste material will take place within the waste sorting hall, which is fully bunded and contained, and directed to the water treatment system. All storage and processing tanks are bunded in accordance with EPA and relevant standards, and inspected and cleaned daily.

The existing system has both the capability and capacity to treat the proposed additional volumes. There would be no requirement to change or enlarge the existing operation of the water treatment system of stormwater drainage system.

Revision B: No change to the Section 6.2, Water Quality, Drainage and Soils, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6.3 BIODIVERSITY

6.3.1 Existing flora and fauna

The sites have been heavily modified by industrial use. Several landscaping trees and shrubs are located within the front property boundary of 6 Sleigh Place, which will be unaffected by the proposal. The majority of the sites are hardstand. There are limited flora and fauna resources on the sites and its immediate surroundings, with very little potential habitat.

A search of the NSW BioNet Atlas shows a range of vulnerable and threatened species in the wider Prospect-Wetherill Park area, but none in the immediate vicinity or that would be impacted by the proposal.

A Biodiversity Development Assessment Report (BDAR) Waiver is included in **Appendix F.**

6.3.2 Construction impacts

The proposed development consists of installation of a duplicate scrubber, which will have no impact on any flora or fauna species. No alterations or additions to buildings are proposed to the Facility or Depot. No excavation or vegetation clearing is required.

6.3.3 Operation impacts

There will be no additional impacts during the operational phase.

Revision B: No change to the Section 6.3, Biodiversity, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6.4 AIR QUALITY (DUST & ODOUR)

6.4.1 Existing air quality

Air quality in the precinct is typical of a large industrial area, with impacts from traffic congestion, heavy vehicles and industry. The prevailing wind direction is from the south west.

Mainstream Recycling has held an EPA Licence (No. 20694) for the Facility since 2015, and has achieved full compliance with air quality conditions. No contacts or complaints have been received from operation of the Facility.

An odour assessment was prepared by Stevenson Environmental in July 2018 for a modification assessment (DA 803.4) to permit annual processing capacity of 29,500 tpa, and concluded that:

- Peak activities inside the building ranged between 28 and 49 odour units (OU);
- The measured odour concentration using field olfactometry inside the building was 30 OU;
- The measured odour concentration outside the open eastern access roller shutter door was less than 2 OU, and outside the western access roller shutter door which serves the entrance to the weighbridge was 2 OU;
- The measured odour concentration at the Sleigh Place boundary was not detectable;
- The appropriate impact assessment criterion for odour in an area with a population greater than 2,000 people is 2 OU;
- The odour impact of the Facility under normal operating conditions complies with the impact assessment criterion of 2 OU.

Current Site Operations

In 2021 RWDI Australia Pty Ltd (RWDI) were engaged to assess site operational air

quality performance during assessment to modify the existing Wetherill Park Recycling Facility approval (DA 803.4/2014).

A site visit was conducted by RWDI at the Facility on 2 March 2021 to compare current odour levels within the Facility to those found in the odour assessment by Stephenson Environmental in 2018. Odour measurements within the Facility were conducted with as a St. Croix Sensory Nasal Ranger Field Olfactometer. The Nasal Ranger quantifies odour in the air by mixing the odorous ambient air with odour-free (carbon) filtered air. Field olfactometry defines each discrete dilution level as a "Dilution-to-Threshold," D/T, ratio. The "Dilution-to-Threshold" ratio is a measure of the number of dilutions needed to make the odorous ambient air "non-detectable".

Field olfactometry calculates the "Dilution-to-Threshold" (D/T) ratio as:

$$D/T = Volume\ of\ Carbon\ Filtered\ Air / Volume\ of\ Odorous\ Air$$

The Nasal Ranger Field Olfactometer measures odour D/T values of 2, 4, 7, 15, 30 and 60. A D/T value greater than 7 is typically considered a nuisance odour.

The measurements indicate that odour levels associated with current operations within the Facility are generally consistent with those observed in the 2018 Stephenson (above) odour assessment:

- Within the processing building, a strong "earthy" odour, D/T ration = 30;
- Eastern roller door, a faint "earthy" odour, D/T ration = 2;
- Western roller door, a faint "earthy" odour, D/T ration = 2;
- Carpark, no detectable odour, D/T ration <2.

In addition to the field olfactometry measurements summarised above, which demonstrated that odours were not detectable within the carpark of the Facility, odour from the operation of the Facility was not detectable beyond the site boundary.

6.4.2 Construction impacts

Construction activities comprise the installation of an additional standby activated-carbon scrubbing unit. This would not generate any dust or odour, and as the existing scrubber will remain operational during installation, hence no increase in odours will be generated.

6.4.3 Operation impacts

AirLabs Environmental (Airlabs) carried out an air quality assessment of the existing operations, and predicted impacts of the proposal to increase handling volumes to 65,000 tpa (see **Appendix G**) in accordance with the SEARs requirements set out by DPIE, NSW EPA and Fairfield City Council. The report includes:

- a description of the proposal
- discussion of air quality issues related to the proposal;
- a description of local dispersion conditions at the site;
- a description of the assessment process and modelling parameters, and;
- results of the modelling, including predicted odour contours around the site.

The Assessment has been undertaken in accordance with relevant standards and specifically the following guideline documents:

- Technical framework - Assessment and management of odour from stationary sources in NSW, NSW-EPA, November 2006

- Approved Methods for Modelling and Assessment of Air Pollutants in NSW, NSW-EPA, January 2017.

To assess the odour impacts from the proposal, odour dispersion modelling has been undertaken using the CALPUFF dispersion model. Odour emission rates were estimated based on referencing site-specific odour monitoring data from a survey conducted in 2018.

The Facility is located in an appropriate industrial land use setting – E4 General Industrial. As per the Approved Methods, the assessment criterion of 2.0 OU is applicable at the nearest existing or likely future offsite sensitive receptors and is to be reported as the 99th percentile peak (1-second average) incremental (predicted impact due to the modelled sources alone) odour concentration. The 99th percentile implies that the assessment criteria can be exceeded only for 1% of the entire year (i.e. 87 hours of the 8760 hours in a year).

For this odour assessment, a peak to mean ratio of 2.3 was used to convert mean 1-hour average concentration to the peak 1-second concentration, resulting in the assessment criteria below in **Table 6.1**.

Population of Affected Community	Impact Assessment Criteria (Odour Units – OU)
Urban (≥~2000) and /or schools and hospitals	2.0
~500	3.0
~125	4.0
~30	5.0
~10	6.0
Single rural residence (≤~2)	7.0

Table 6.1: Impact Assessment Criteria – Complex Mixtures of Odorous Air Pollutants

The odour concentrations of the proposal were estimated by scaling the maximum measured odour concentration across all the sources with the waste treatment capacity during the time of sampling (2018, 20,000 tpa) and the proposed waste intake capacities (65,000 tpa). Potential odours generated from the operational activities are currently captured and passed through a scrubbing system before passing through a 0.5m diameter stack, with a cross-sectional area of 0.2 sqm, with a minimum exit velocity of 15 m/sec at all times. An additional activated carbon scrubber would be installed to improve odour removal efficiency and provide contingency in the event of equipment failure or maintenance. As such, no fugitive odours or leakage of odours are expected from the operational activities for 65,000tpa.

Due to generally liquid nature of the waste, no particulate matter or dust would be generated during processing.

Modelling shows that predicted impacts from the proposal comply with the odour assessment of 2 OU **(refer Figure 6.1)**.

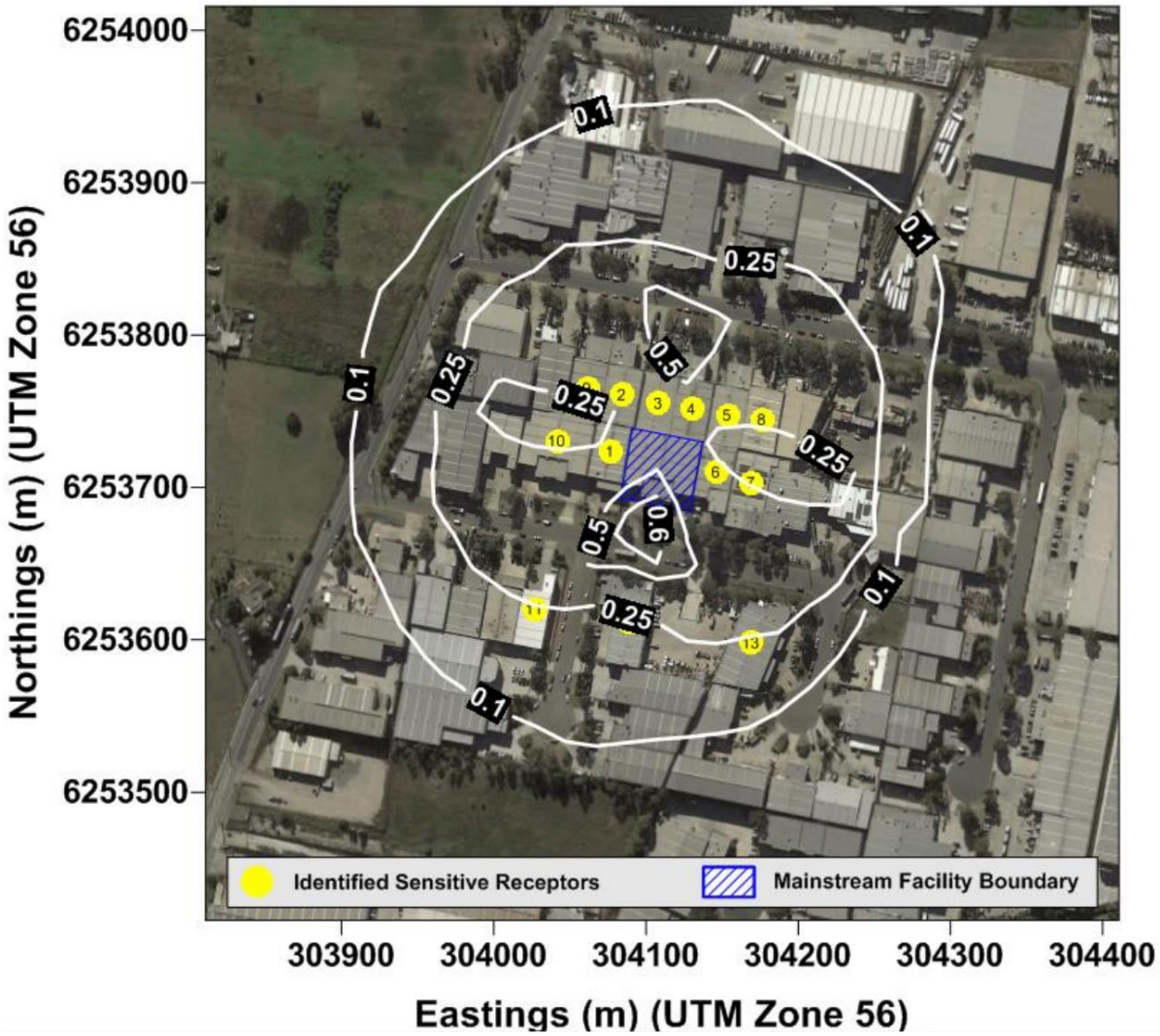

Figure 6.1 Predicted 99th percentile (1 second) Odour Concentrations (Assessment Criteria: 2 ODU).

Compliance is mainly attributed to the non-odorous nature of the waste material, to the extraction fan upgrade, which maintains negative pressure system during operational hours, and capturing potentially odorous air (including the liquid tanks and any fugitive odours) and treating them through an activated carbon unit before discharging into the atmosphere through an exhaust stack which maintains a minimum exit velocity of 15 m/sec at all times. Maintaining a negative-pressure environment minimises the potential for fugitive odours leaking from the Facility and therefore provides the opportunity to operate with the roller doors open.

In conclusion, the modelling demonstrates that the proposed increase in processing volumes to 65,000 tpa will achieve compliance with the odour assessment criteria, and not result in adverse amenity impacts to neighbours, and enable the operation of the Facility with the roller doors open during the operational hours.

Revision B: No change to the Section 6.4, Air Quality, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6.5 NOISE & VIBRATION

6.5.1 Existing Acoustic Environment

The Smithfield-Wetherill Park Industrial Estate hosts a range of heavy industries that operate 24 hours a day.

Background noise in the area is associated with traffic, including a high portion of heavy vehicle movements, and surrounding industrial operations. Transport of goods and materials is often scheduled outside normal working hours to avoid congestion and meet customer requirements.

Traffic along Sleigh Place and Cowpasture Road predominately consists of commercial vehicles, and the industrial noise contributes to the surrounding ambient noise levels. Businesses along Sleigh Place and surrounds generally operate during standard day-time hours, although warehousing and heavy transport activities continue throughout the nights and weekends.

Dominant winds were identified during the evening and night and generally from the south west.

Mainstream Recycling has operated at the site since 2015 with similar processes and has incurred no noise-related complaints or licence non-compliances.

6.5.2 Noise Impact Assessment

An acoustic assessment was carried out by Acouras Pty Ltd for the proposed changes (refer to **Appendix H**). The assessment was based on previous studies, background noise monitoring carried out, site measurement of internal and external operating conditions in May 2018, and carried out in accordance with the NSW EPA *Industrial Noise Policy for Industry Guidelines (INP, 2017).*

For the assessment carried out by Acouras, the nominated receivers, shown in **Figure 6.2,** are:

- R1 – Residents are located at more than 1100m to the west of the site along Redmayne Road in Horsley Park (R2).
- R2 – Buildings (approx. 250m west) along Cowpasture Road within the Western Sydney Parklands and will be assessed as recreational open space
- C1 – Industrial properties located adjacent to the site on Sleigh Place.

Figure 6.2: Site Location, Nearest Residents and Noise Logger Position

Table 6.2 presents a summary of the maximum allowable intrusive noise limit for this project.

Type of Receiver	Time Period	Amenity Criteria Recommended Noise Level (acceptable), Leq	Project Specific Limit, Leq
Residential	All times	35	35
Recreational	When in use	55	45
Commercial	When in use	65	65
Industrial	When in use	70	70

Table 6.2: Noise Survey Summary and Project Limits, dBA

Acouras inspected the Facility in June 2020 to carry out internal and external noise measurement. The two primary equipment units generating noise during operation are the front end loader and conveyor/sort screen. Noise measurement was carried out with the roller doors open. Measured noise levels were then modelled to predict the noise levels at surrounding sensitive receivers using the following process:

- Calculations based on CONCAWE method;
- Calculations allowed for distance attenuation and air absorption;
- No noise modifications factors were applied;
- As a worst case, no shielding from topography, buildings or barriers was allowed for.

Modelling results are set out in **Table 6.3** below:

Noise Source	Internal Reverberant SPL Leq dBA	Predicted Noise Level dBA	Noise Limit dBA
R1 Residential			
Combined equipment/plant	80 (internal)	<20 (inaudible)	35
R2 Recreational			
Combined equipment/plant	80 (internal)	32 (inaudible)	45
C1 – Industrial (Adjacent Properties)			
Combined equipment/plant	80 (internal)	69 (at boundary)	70

Table 6.3: Predicted Noise Levels at Receiver Locations

Traffic Noise: additional specific relative increase criteria apply to traffic generating developments affecting existing sensitive land uses. The *Road Noise Policy Application Notes* (EPA, 2013) states the following:

"Any increase in the total traffic noise level as a result of the development should be limited to 2 db above that of the noise level without the development. This limit applies wherever the noise level without the development is within 2 db of, or exceeds the relevant day or night noise assessment criterion".

Road traffic noise is expected on Sleigh Place (with no sensitive receivers) and then through different suburban and major roads. As the increase in truck numbers is minimal, and distributed throughout the day, it is anticipated there will no negligible if any change in traffic noise levels due to the proposed increase.

Construction noise: Installation of the additional carbon scrubber unit would take several days, would be carried out within standard working hours of Monday to Friday 7.00 am to 6.00 pm, and would not generate any substantial noise.

Vibration: The Facility does not generate any discernible vibration, and the increase in operating capacity would not generate any additional vibration during construction or operation.

6.5.3 Conclusion

Measurement and modelling of the proposed capacity increase and 24/7 access and operation concludes that, based on the measured noise levels and operations with the doors open, that:

- the predicted noise emissions at the receiver locations along Redmayne Road (R1) and Cowpasture Road (R2) would be inaudible;
- as the existing plant would be used for the proposed capacity increase of 65,000 tpa, the assessment concluded that the operations at full capacity would have negligible additional amenity impacts, would comply with NSW EPA Industrial Policy Guidelines, and not be offensive;
- there would be negligible, if any, noise or vibration during construction;
- there would be negligible traffic-related noise impacts during operation.

It is therefore concluded that the acceptance of additional liquid waste would not have a significant noise impact on adjoining neighbours or the nearest residences.

Revision B: No change to the Section 6.5, Noise and Vibration, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6.6 TRAFFIC, ACCESS & PARKING

6.6.1 Introduction

A Traffic and Transport Assessment Report (Traffic Assessment) has been carried out by Transport & Urban Planning Pty Ltd (refer **Appendix I**). The Traffic Assessment addresses traffic, access and parking requirements of the SEARS, as set out by DPIE, Transport for NSW (TfNSW), RMS and Fairfield City Council.

The Traffic Assessment assesses the impacts of increasing the processing capacity of the Facility to 65,000 tonnes per year, including TDC truck and truck driver parking at 103 Cowpasture Road.

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. This depot provides truck driver and truck parking (DA 193.1/2020). Should the situation arise in the future that TDC relocate, this would be independent of Mainstream Recycling's operations at 6 Sleigh Place.

The Traffic, Access & Parking Report (Appendix I) assesses the TDC truck depot as part of the cumulative assessment only. Mainstream Recycling (ABN 75 611 996 493) does not own or operate trucks, hence parking is only required at 6 Sleigh Place for staff and visitors. TDC and its operations is not part of this proposal.

The Traffic Assessment examines parking, access and internal manoeuvrability, and existing traffic conditions surrounding the Facility at 6 Sleigh Place and the truck parking Depot at Unit 2/103 Cowpasture Road, the traffic generating characteristics during construction and operation, suitability of access arrangements, and the transport impact of the proposal on the surrounding network.

The Traffic Assessment has been undertaken in accordance with the requirements of Transport for NSW (TfNSW) Guidelines to Traffic Generating Developments (October 2002), and other technical standards/publications including:

- Austroads Guide to Road Design and RMS supplements;
- Austroads Guide to Traffic Management and RMS supplements;
- Austroads Guide to Traffic Management Part 12. Traffic Impacts of Developments;
- AS/NZS2890.1 (2002), AS2890.2 (2018) and AS/NZS2890.6 (2009).

6.6.2 Assessment Scope

The increase in the amount of material processed does not require any change to the Facility's layout or access. The proposed capacity increase includes an extension to the hours of operation to 24 hours 7 days a week. The proposed hours of operation for the processing of the waste would initially be 5.00am to 10.00pm Monday to Saturday, with the facility receiving waste over 24 hours. Mainstream Recycling is however seeking approval for 24/7 access to the site, with the processing ramping up to 24/7. As demonstrated by the Acoustic Assessment (Section 6.4 and Appendix H), there are anticipated to be no adverse impacts on sensitive receivers from 24/7

operations.

The Facility will retain 23 parking spaces including one (1) accessible space and two (2) visitor spaces. (While it is acknowledged the 2015 consent and 2020 Modification (MA 804.4/2014) for Sleigh Place sets out that two (2) parking accessible spaces be provided, these have never been used, and (1) accessible space is deemed sufficient). Visitors to the Facility are expected to be a maximum of two (2) people at any time.

The truck fleet used by Mainstream will continue to use the same size trucks which are:

- 15 x 10.3 metre long HRV trucks which collect the waste to be processed;
- 1 x 11.0 metre long HRV tipper;
- 1 x 19.0 metre long articulated vehicle (truck and dog trailer). This vehicle is owned by a contractor and not parked at either Mainstream recycling site.

Mainstream Recycling also operate several Class 1 utes and vans which are also parked at the Cowpasture Road depot.

Truck volumes entering and exiting the Facility will increase as follows (refer to Table 6.4 for comparison of key operating parameters):

- Receipt of waste material in tankers (10.3 metres long) will increase from 10 trucks per day to 33 trucks per day;
- Waste removal trucks in 19.0 metre articulated truck and dog vehicle will increase from one (1) truck per week to four (4) trucks per week.

Table 6.4: Comparison of key operating parameters of the Facility between the existing operation and the proposed operation.

	Existing	Current Application	Proposed Capacity
Capacity (tonnes per annum)		29,500	65,000
Hours of Operation		6.00am-to-6.00pm (M-F), 6.00am-to-1.00pm Sat.	24/7 receivals and processing (including Sundays and public holidays).
Employees at Sleigh Place	15	15*	20*
On-site car parking at Sleigh Place	23	23**	23**
Waste Delivery (trucks per day) at Sleigh Place	10	15	33(6)***
Waste Removal (trucks per week) at Sleigh Place	1	2	4
Visitors (per day) at Sleigh Place	1	2	2
TDC Truck drivers at Cowpasture Rd Depot	18	18	22
TDC On-site car parking at Cowpasture Rd Depot		24* (incl.one accessible park)	24* (incl.one accessible park)
Types of Trucks		10.3m long HRV tankers 11m long HRV tipper Articulated 19 m long truck and dog	No change

** Number of employees at 6 Sleigh Place. Truck drivers and associated personnel are additional and are stationed at Unit 2, 103 Cowpasture Road.*

*** Car park configured for one accessible car space to AS2890.6 requirements with a total of 23 car spaces.*

**** Upto 6 trucks may operate at night between 10.00pm and 5.00am*

6.6.3 Existing traffic and road network

6.6.3.1 Traffic and Access

Wetherill Park Industrial Precinct has been designed to concentrate heavy vehicle movements and deliver them to an appropriate intersection within the regional road network. The Precinct is well serviced by a number of arterial roads including The Horsley Drive to the south, Cumberland Highway to the east, Resolution Drive, the M4 Motorway and Great Western Highway to the north and Prospect Hihgway/Westlink M7 to the west.

Streets within the Industrial Estate have been designed specifically to cater for the movement of heavy vehicles within an industrial area, and as such provides wide carriageways with lay-bys and turning areas suitable for vehicles to enter all adjacent sites.

Sleigh Place: The vehicle access to 6 Sleigh Place is via separate entry and exit driveways (i.e. one way in and one way out) which are 9 metres wide. These driveways comply with AS2890.2 requirements. Sight distance at vehicle entry and exit driveways in Sleigh Place is also satisfactory and compliant with AS2890.1 and 2 requirements.

Trucks entering and exiting the site follow a one-way circulation pattern through the site. Once inside the building the trucks reverse to unload and drive out. The manoeuvring into and out of the site, as well as within the site, for HRV tankers and the 19-metre articulated waste truck vehicle is fully compliant with AS2890.2 requirements (refer **Appendix I** for swept path analyses).

This arrangement has proven effective and efficient for all trucks since commencement of operations in 2015. No change to this arrangement is proposed.

The Traffic Assessment investigated and assessed both public transport and cycle routes in the local area. Operational experience suggest that employees do no find public transport feasible, primarily due to lack of convenience for commuting.

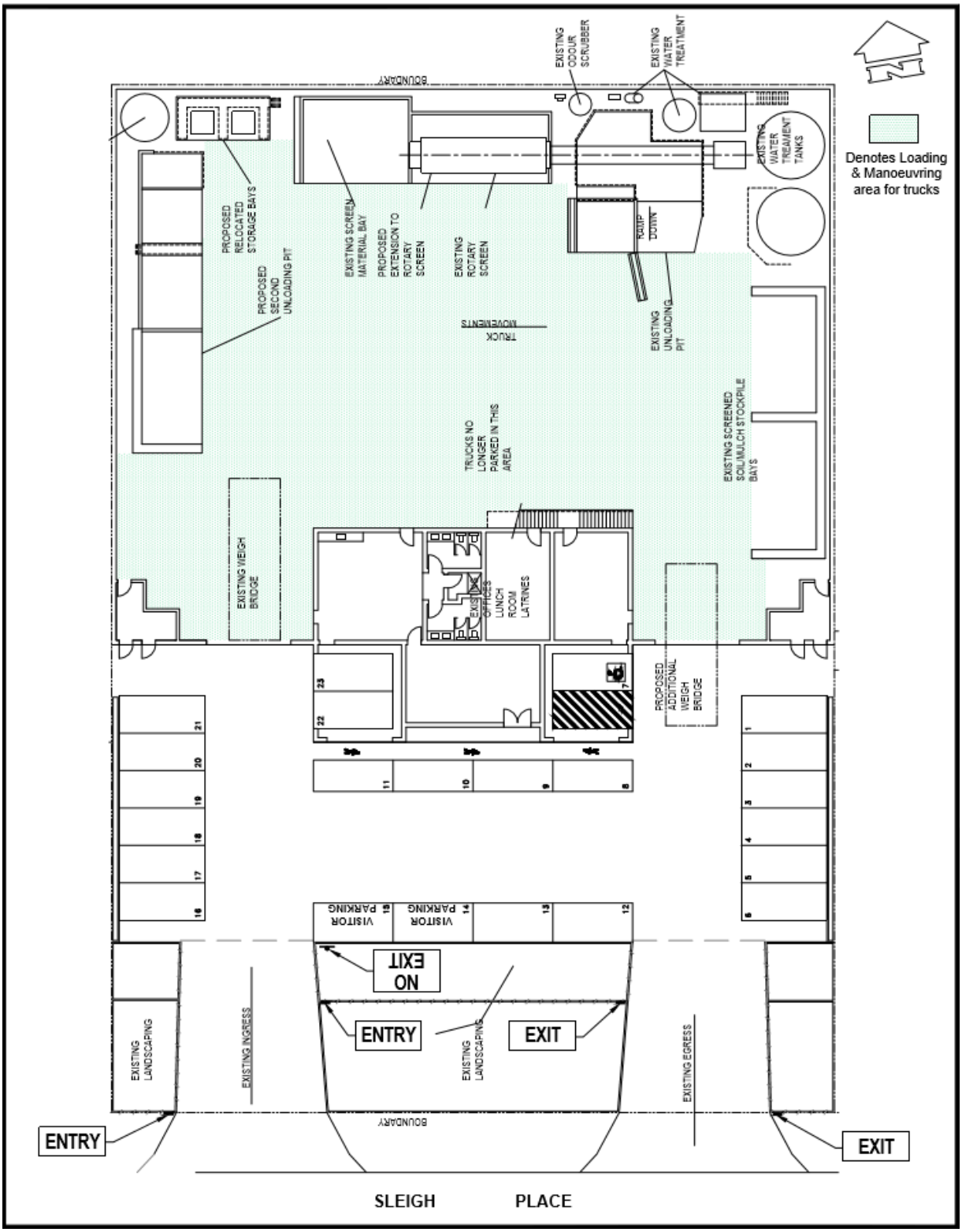

Figure 6.3 Access and parking arrangements at 6 Sleigh Place, Wetherill Park

Cowpasture Road: TDC, the primary customer of Mainstream Recycling's Facility, provides parking for trucks and drivers at Unit 2/103 Cowpasture Road (202/DP 854677), Wetherill Park, approximately 150 metres away (refer **Figure 6.4**). The truck drivers start and finish at Unit 2, 103 Cowpasture Road, which is held by TDC on a long-term lease specifically for this purpose.

Unit 2 is located on the southern side of the site. Unit 1, which is currently used for a warehousing and distribution by others, is on the northern side of the site (refer **Figure 6.5**). Unit 1 has its own at-grade car parking and loading area.

The site has a combined entry/exit driveway to Cowpasture Road which is 10.2 metres wide at the property boundary with splays to the kerbline. The site is north of Trivett Street with the site's driveway located approximately 90 metres north of Trivett Street.

Cowpasture Road is 12.0 – 12.8 metres wide adjacent the site with kerb and gutter. The driveway to the site is located on a crest and sight distance to and from the north is 120 metres and to and from the south is 100 metres, which meets Austroad requirements for the posted speed limit.

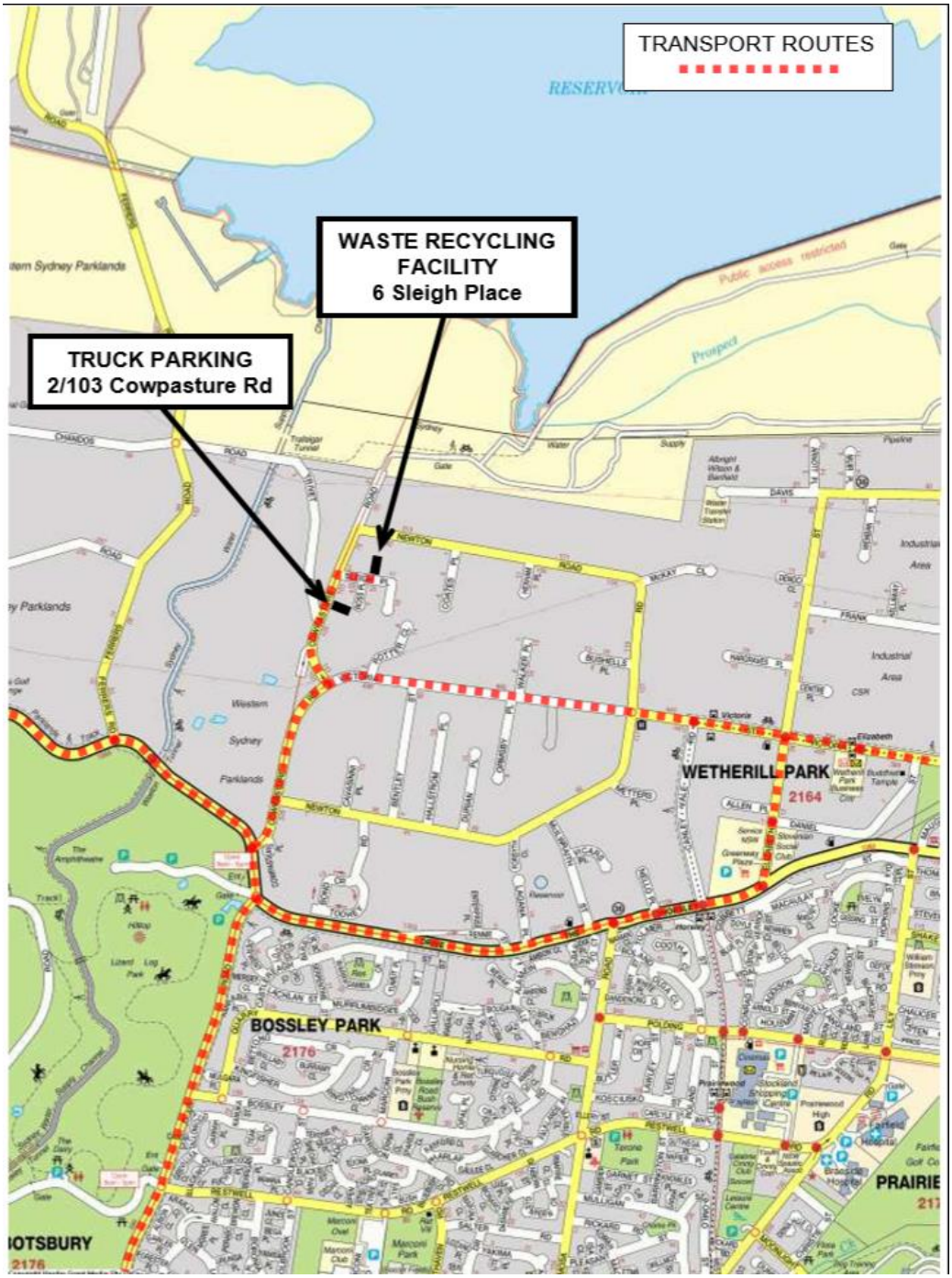

Figure 6.4 Transport Routes for Truck Movements

Figure 6.5 Access to Truck Parking Site at Unit 2, 103 Cowpasture Road

6.6.3.2 Parking and Internal Circulation

Sleigh Place has 23 car parking spaces, including one (1) accessible parking space to current AS2890.6 requirements and two spaces for visitors. This provides ample off-street parking for current staff requirements of 15 employees, in addition to visitors.

The carparking arrangement readily allows for car and truck manoeuvring. The car

parking spaces and layout are compliant with AS2890.1 requirements with regard to space sizes, aisle widths etc. The site layout and internal operation is considered to be satisfactory and compliant with AS2890.1 and AS2890.2 requirements.

No change to staff parking requirements is required, as floor space of the site will not be altered by the proposal. No permanent truck parking spaces are required at 6 Sleigh Place.

Cowpasture Rd Depot: TDC truck drivers park their vehicles at Unit 2, 103 Cowpasture Road. There are 24 car parking spaces at Unit 2, including 18 spaces at-grade including an accessible space, and 6 car spaces in the basement. During the evening the HRV trucks and several utes/vans are parked within the building.

Unit 2, 103 Cowpasture Road, including its onsite parking, is approved as an industrial use. TDC leases the site on a long-term basis to provide parking for its truck fleet, and its occupation and use is considered to be in accordance with its existing approval (DA 193.1/2020).

Trucks occasionally need to enter and exit the Cowpasture Road depot outside the approved hours of operation due to emergencies. There are no traffic, road safety or amenity issues with trucks entering or leaving the site 24 hours a day, 7 days a week. The site layout and internal operation is considered to be satisfactory and compliant with AS2890.1 and AS2890.2 requirements.

6.6.4 Construction Impacts

Construction will comprise installation of an additional odour scrubbing unit at 6 Sleigh Place. Traffic, access and transport impacts from the minor construction works are anticipated to be negligible.

6.6.5 Operational Impacts

6.6.5.1 Traffic Impact Assessment

The Traffic Assessment (**Appendix I**) examined the existing road network, traffic controls and traffic conditions in the local area. Weekday AM and PM peak hour traffic volumes at the intersection of Cowpasture Road / Sleigh Place and at the roundabout intersection of Victoria Street/Cowpasture Road were recorded in traffic counts undertaken on 24 October and 7 November 2019. The peak hours occurred between 8.00am – 9.00am and 4.30pm to 5.30pm.

Traffic conditions at the Victoria Street / Cowpasture Road roundabout intersection were observed to be good with satisfactory vehicle delays. Traffic conditions on the wider road network are also assessed as satisfactory during the weekday AM and PM peak hours.

At proposed capacity of 65,000tpa, the proposal will generate approximately four (4) additional HRV movements inbound and outbound at both the AM and PM peak hours (refer **Table 6.5**). The Traffic Assessment concluded that the impacts of these additional trips on the adjacent road network will be relatively minor. Modelling using SIDRA concluded the operational performance of the key intersections at Cowpasture Road/Sleigh Place and Victoria Street/Cowpasture Road intersection would not result in adverse impacts when compared to existing conditions.

Unit of Time	HRV Truck Numbers	19m Articulated vehicles
Hour	4	-
Day	33	<1
Week (6 days)	185	4

Month (4 weeks)	740	16

Table 6.5: Estimated truck numbers for the proposed 65,000 capacity.

The SIDRA modelling predicted the proposal would result in little if any vehicle delay at the critical Sleigh Place/Cowpasture Road intersection, which will continue to operate at an 'A' (very good) level of service during peak periods. There will be no impact on any residential streets as a result of the proposal.

Note: *As part of the DA for the 29,500tpa application, Fairfield City Council requested information about 19 metre long articulated vehicles using the intersection of Cowpasture Road and Sleigh Place. This updated information supersedes the previous information provided to Council.*

*The 19 metre articulated truck and dog waste vehicle per day associated with the proposal will use the intersection of Cowpasture Road/Sleigh Place. The Traffic Assessment (**Appendix I, Figure 11B**) demonstrates the left turn out of Sleigh Place and also shows that this manoeuvre is satisfactory and fully compliant with Austroads Guidelines.*

As noted above, the proposal is for a very small number of 19 metre articulated truck and dog vehicles to access the site per day and use the intersection of Cowpasture Road / Sleigh Place. The use of the 19.0 metre articulated truck and dog vehicle is considered to be satisfactory.

Condition 17 of MA 803.4/2014, which approved the increase of capacaity at the Sleigh Place Recycling Facility, requires that *"articulated vehicles used for the servicing and/or operations of this development are restricted to a maximum of two times per week."* Mainstream Recycling will readily meet this requirement, by use of HRVs to supplement the two articulated load-outs.

Unit 2, 103 Cowpasture Road accommodates the truck driver and associated personnel parking for TDC during the day and truck parking overnight. Based on the traffic volumes using this section of Cowpasture Road in the PM peak hour and the small number of vehicles that will be generated by Unit 2, the traffic impacts at the driveway entrance on Cowpasture Road are assessed as satisfactory.

6.6.5.2 Internal Operations at Sleigh Place Facility

The proposed increase in capacity to 65,000 tonnes per year will result in up to 33 HRV trucks visiting the Facility per day to deliver material to be processed and one (1) 19 metre articulated truck and dog removing waste from the Facility per day (i.e. 4 waste trucks per week). These trucks will load and unload within the building, which takes less than 15 minutes per vehicle and then depart the site.

The Facility generally operates for 10 hours per day which is an average of 3-4 trucks per hour. (NB: the site will be available for out of hours emergencies to receive waste, but not process it.)

Up to three HRV trucks can operate or be stored inside the building at the same time. The trucks use all of the manoeuvring area within the building to unload and load.

Based on the service time of 15 minutes per truck and the capacity within the building to accommodate 3 waste delivery trucks at the time same, it is concluded that there is adequate capacity to easily accommodate the number of waste delivery trucks (i.e. average 3-4 per hour), without any impact on site manoeuvrability.

The waste removal truck, which is a 19.0 metre articulated truck and dog and numbers one per day (i.e. 4 per week) can be scheduled to occur at those times when there are no delivery waste trucks.

The internal operation of the Facility has been checked using AUTOTURN software and swept path diagrams prepared for the HRV's and the 19.0 metre articulated truck and dog in accordance with AS2890.2 (refer to Traffic Assessment Report in **Appendix I** for swept path analyses).

The truck loading area within the building is separated from the car parking which is located at the front of the site and outside the building. Trucks arriving and departing the site will not impact on the car parking area. Other than two car spaces set aside for visitors, the rest of the car parking is for employees who arrive before the truck operation commences and leave the site after the truck operation ceases. A Loading Management Plan is provided in of the Traffic Assessment (**Appendix 1**).

The two visitor spaces are located at the front of the site which allow visitors to enter and exit the site with minimal interaction with the trucks using the site.

In summary, vehicles will not queue out of the site as all vehicles can enter and exit the site in a forward direction. In addition, the on-site manoeuvring is satisfactory and fully compliant with AS2890.2.

6.6.5.3 Parking Assessment

Sleigh Place: Fairfield Citywide DCP does not provide a specific carparking rate for waste or resource recovery facilities. Therefore, the assessment is merit-based, as required by the operational characteristics of the Facility.

6 Sleigh Place has 24 car parking spaces, including one (1) accessible parking space to current AS2890.6 requirements and two spaces for visitors.

As the maximum number of employees at the Sleigh Place Facility is/will be 15 persons, and allowing for two visitors carparks, the maximum number of car spaces required is 17 car spaces. Therefore, it is concluded that the parking provision of 23 car spaces at Sleigh Place is more than adequate for the Facility with proposed increase in capacity.

Truck Parking Depot: Unit 2,103 Cowpasture Road provides parking for trucks and truck-driver vehicles for TDC. There are 24 car parking spaces including 18 spaces at-grade, including an accessible space, and 6 car spaces in the basement. During the evening the HRV trucks and several utes/vans are parked at Unit 2 within the building. Vistors rarely, if ever, attend the site.

Figure 6.6 shows the site layout including the vehicle parking, truck parking and 10.3m long HRV's manoeuvring within the building. Analysis concludes the depot parking, layout and internal manoeuvrability is satisfactory and compliant with AS2890.1, AS2890.2 and AS2890.6.

Unit 2, 103 Cowpasture Road, including its on-site parking, is approved as an industrial use (warehousing and distribution) and its occupation and use by TDC is considered to be generally in accordance with its existing approval.

TDC trucks will occasionally need to enter and exit the site outside the approved hours of operation due to emergencies. There are no traffic, road safety or amenity issues with trucks entering or leaving the site 24 hours a day, 7 days a week.

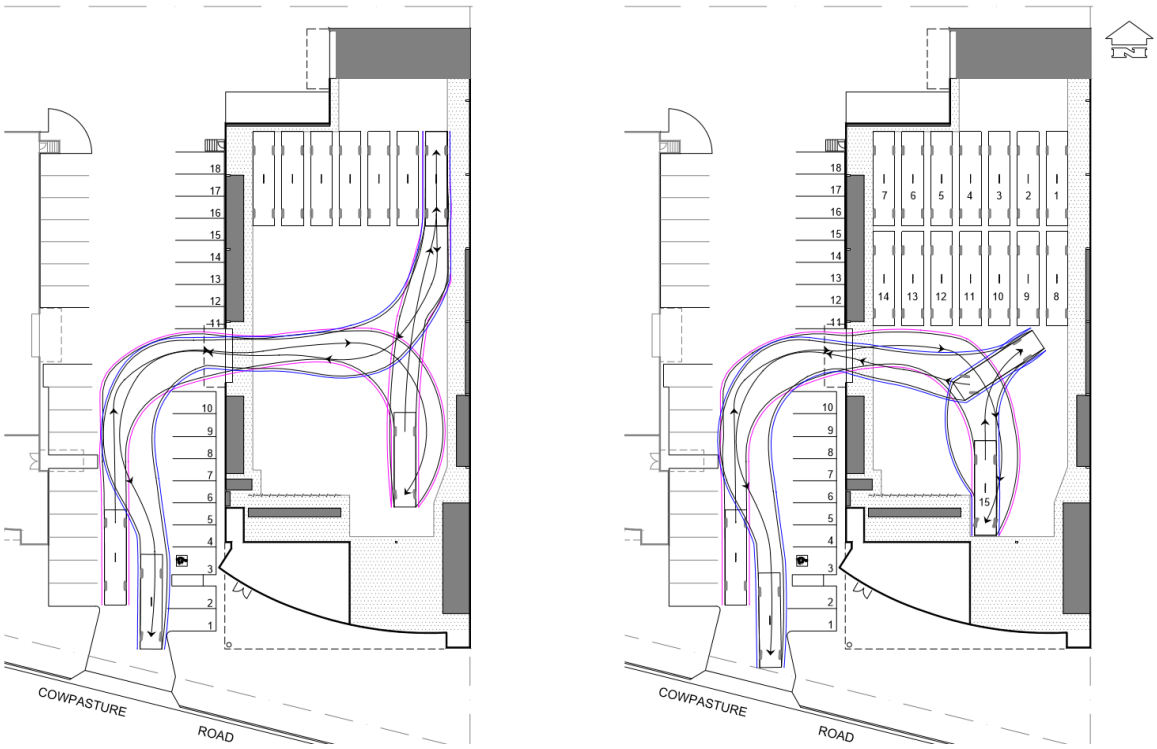

Figure 6.6 Truck Parking, Layout and Manoeuvrability at Unit 2, 103 Cowpasture Rd

6.6.6 Conclusions

This Traffic Assessment (refer **Appendix I**) documents the assessment of traffic, transport and parking impacts of the proposed increase to 65,000tpa at 6 Sleigh Place, Wetherill Park. The assessment has found that:

- The proposed increase in capacity at the Facility will have relatively minor impacts on the road network adjacent to the site, and traffic conditions on the road network will be satisfactory, with the proposal in place;
- The Facility, which has 23 off-street car spaces, including one (1) accessible parking space, complies with AS2890.6 requirements, and will have adequate car parking to accommodate its maximum car parking demand;
- There is no requirement for truck parking at the Facility as the truck parking for TDC, its primary customer, is accommodated off site at Unit 2, 103 Cowpasture Road;
- The car park spaces and adjacent aisle widths on the site are compliant with AS2890.1;
- The driveways and internal operation with regard to trucks entering and exiting the site and manoeuvring within the site is fully compliant with AS2890.2;
- The TDC truck fleet and truck-driver parking is provided at Unit 2, 103 Cowpasture Road, in accordance with its existing consent. The Traffic Assessment concluded that ample truck and vehicle parking would be available, internal operations were satisfactory, compliant with AS2890.1 and AS2890.2. The Traffic, Access & Parking Report (Appendix I) assesses the TDC truck depot as part of the cumulative assessment only. Mainstream Recycling (ABN 75 611 996 493) does not own or operate trucks, hence parking is only required at 6 Sleigh Place for staff and visitors.

Revision B: No change to the Section 6.6, Traffic, Access and Parking, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6.7 HERITAGE

6.7.1 Existing setting

A search of the relevant registers and visual inspection of the site indicates that there are no listed heritage items in the immediate areas, or items of conservation value. A number of items associated with Prospect Reservoir were identified in the wider vicinity however these would not be impacted by the works.

As the sites has been highly modified by past use, and the proposed works do not entail building works or excavation, it is considered unlikely that any items of indigenous heritage would be present.

6.7.2 Construction impacts

No excavation is required. No impacts from the installation of the duplicate scrubber are anticipated on any indigenous or non-indigenous heritage items.

6.7.3 Operation impacts

The operational phase of accepting and processing additional volumes of liquid waste would have no impact on heritage items or places in the vicinity.

Revision B: No change to the Section 6.7, Heritage, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6.8 VISUAL AMENITY, SOCIAL AND COMMUNITY ASSESSMENT

6.8.1 Existing scenic condition and local character

The Smithfield-Wetherill Park Industrial Estate is characterised by industrial buildings and associated structures ranging from processing and manufacturing plants, wholesale, transport and service firms. The Facility consists of paved parking and driveway areas and a large waste sorting hall with associated office and meeting room areas. Small landscaped areas are located between the driveways and carpark.

The Facility has minimal street frontage consisting of the wide driveways for ingress and egress. Passing traffic is primarily industrial.

No adjacent land uses will be able to directly view the proposed operations, as they will be carried out within the existing recovery hall.

The nearest residential areas are located across approximately 1.3 km from the site and have no direct view of the site. The site is located within an industrial precinct away from residential and recreational activity areas.

6.8.2 Visual impact assessment

As the proposal will not alter the existing building or site layout the visual amenity of the area will not be impacted on by the proposed development.

The proposed development will have no visual effect on neighbouring buildings.

6.8.3 Construction Impacts

Construction will have negligible impact on the surrounding properties and is compatible with the adjacent industrial land uses. The proposed development is not anticipated to have any detrimental impact on social amenity.

6.8.4 Operational Impacts

In the broader context, the proposed development will facilitate increased diversion of liquid waste for recycling, whilst diminishing the potential for inappropriate disposal and associated risks of sewer, river, beach and harbour pollution. By offering a safe and cost-effective recycling option for liquid waste, the project will have a positive social benefit for both the local and broader Sydney communities.

The proposed development is concluded to be consistent with State and Regional planning instruments by facilitating an increase in recycling and reduced generation of waste.

Revision B: No change to the Section 6.8, Visual Amenity, Social and Community Assessment, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6.9 PUBLIC HEALTH & SAFETY

6.9.1 Introduction

The management of waste streams from collection through to beneficial reuse or disposal requires consideration so that appropriate design and safeguards are implemented to prevent public health and occupational health and safety risks.

The acceptance and processing of increased volumes of liquid waste to the Facility poses a potential issue for public health and safety.

The Western Sydney Public Health Unit (WSPHU) *Waste Management Guidelines for Health Care Facilities* (1998) have been reviewed and considered. The following health impact assessment has been prepared to address these guidelines in relation to liquid waste and to ameliorate any health impacts on the community.

6.9.2 Overview of Potential Public Health Risks

In consideration of this proposal and experience with existing similar facilities, the following potential public health risks have been identified with respect to the construction and operation of the proposed development:

Operational Risks

- waste collection and transport to and from site;
- unloading, handling and storage on site;
- airborne emissions from waste handling – odour, dust and airborne pathogens;
- stormwater management;
- wastewater management;
- control of vermin and insect pests; and
- security.

Operational experience at the Facility demonstrates that these should be no potential

chronic or acute health risks associated with a well managed process.

The following table outlines the measures designed to mitigate health risks associated with the proposal:

Table 6.1: Design and management of exposure risks to human health

Aspect of Operation	Nature of Risk	Potential Exposure Pathway	Proposed Safeguards
Operation			
Waste collection and transport to and from site	Traffic hazards and exposure to wastes	Traffic accidents, inhalation and physical contact with wastes	▪ Wastes transported in industry best-practice vacuum tankers and trucks. ▪ Compliance with EPA waste tracking system ▪ Training in appropriate procedures provided to operators and truck drivers, including emergency and spill response
Unloading, handling and storage on site	Exposure to waste-related pathogens and attraction of insects and vermin	Inhalation and physical contact with wastes. Secondary impacts through pathogen-spreading vectors such as insects and vermin	▪ Products transferred as soon as possible. ▪ Unloading, loading bays and storage areas designed to be well ventilated, contained with bunds in accordance with EPA and WorkSafe requirements, and secure from vermin and insect pests ▪ Areas maintained with best practice housekeeping standards ▪ Training of operators in waste handling and emergency and spill response procedures ▪ Segregation of various waste types and treated products
Wastewater management	Exposure to waterborne pathogens	Physical contact	▪ All wastewater to be treated and discharged to Sydney Water sewer
Stormwater management	Contamination	Physical contact	▪ Prevention of stormwater entering process and handling areas through use of roofs and bunds.
General traffic and road safety	Traffic hazards and exposure to wastes	Traffic accidents and physical contact with waste	▪ Training in appropriate procedures provided to operators and truck drivers, including emergency and spill response ▪ Transport by enclosed, suitable trucks ▪ Clear signage around site to define what traffic is permitted in what areas on site
Control of vermin and insect pests	Exposure to vector-related pathogens	Physical contact	▪ Comprehensive vermin/vector control program for Facility; ▪ Use of rodent traps at appropriate locations in storage areas ▪ Stringent housekeeping procedures ▪ Design incorporating proper site drainage to prevent stagnant wet areas that attract mosquitoes and other insect pests
Security	Public access to site	Accidents and physical contact with wastes	▪ Restricted public access ▪ Site bounded by appropriate security fences, with 24 hour security patrols and 24hr camera ▪ Warning signs displayed at appropriate locations around site

Stringent housekeeping is central to the successful operation of the Facility, and includes:

- Training of all staff in correct handling, use of appropriate PPE, and control of vectors;
- Regular washing, and adherence to strict maintenance regimes, for all trcuks and vehicles,
- Use of professional pest control contractors and systems as appropriate (eg Rentokill or similar) to eliminate insects and rodents etc, and;
- Rigorous auditing of the effectiveness of the above controls.

Potential public health implications for the proposed development are further reduced by the position of the Facility within an industrial precinct, which is located more than 1km from the nearest residential area.

The adjacent premises are occupied by industrial businesses (e.g. transport, manufacturing), at adequate separation distances from the site. There are no recreational areas nearby and the access roads are seldom used by the public.

6.9.3 Conclusion

The results of this health impact assessment indicate that public and occupational health and safety risks associated with the proposed increased waste volumes will be negligible if the safeguards outlined above are implemented. As well as complying with stringent OH&S guidelines, Mainstream Recycling have also implemented an Occupational Health and Safety Management System, which is certified to AS 4801 (and an Environmental Management System in accordance with ISO-14001). Mainstream Recycling's management are directly responsible for the maintenance and auditing of these systems, and broader compliance with Consent and Licence requirements.

Revision B: No change to the Section 6.9, Public Health and Safety, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6.10 WASTE, ENERGY & RESOURCES

6.10.1 Energy Use

The existing Facility has a power consumption of approximately 100 - 120kWh per month**,** and this would be expected to increase marginally as a result of the proposed changes.

Trucks are predominantly diesel, with diesel-powered plant used for transporting materials around the site. Most of the facilities and amenities require electricity.

In 2017 Mainstream Recycling installed a rooftop-solar system at the Facility, which has significantly reduced energy consumption from the grid, as well as providing substantial feed-in to the grid at various times during the day and weekends when processing is not being undertaken. As standard operating hours are during the day, the 40kW system largely offsets all greenhouse gas emissions from the Facility. There is ample roof-area for amplifying the solar system should it prove justified.

6.10.2 Existing Waste Generation

Mainstream Recycling has a comprehensive waste management system in place. The proposed increase in waste volumes will not substantially alter the waste types and recovery processes.

The proposed volume increases at the Facility are an important component of sustainable waste management through resource recovery. It is also consistent with the statutory objectives of Resource NSW in achieving a reduction in waste generation and turning waste into recoverable resources when suitable and in accordance with NSW EPA Resource Recovery Orders. The *NSW Waste and Sustainable Material Strategy 2041* provides a framework for reducing waste and making better use of our resources, in line with the principles of ESD. With their dual focus on protection and conservation, reprocessing and resource recovery, where appropriate and in accordance with NSW EPA Classification Guidelines and Resource Recovery Orders, are targeted as a means of reducing potential hazards to the environment and capturing value from materials that would otherwise be disposed of to landfill.

6.10.3 Construction and Operations Impacts

Construction waste impacts are anticipated to be negligible, as it will primarily consist of packaging from the duplicate scrubber to be installed.

The acceptance of increased volumes of liquid waste would see additional wastes diverted from sewer and landfill to be re-processed by others for beneficial reuse if appropriate.

All waste and processed material will continue to be transported off-site following analysis in accordance with NSW EPA Waste Classification Guidelines 2014 (refer to Appendix J, Waste Management Plan). The Waste Management Plan, and all other management plans, will be updated as appropriate following approval, and submitted as a supporting document with the EPA Licence amendment application.

Revision B: No change to the Section 6.10, Waste, Energy and Resources, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6.11 ECONOMIC & FINANCIAL ASSESSMENT

6.11.1 Existing environment

The Facility is located in the Smithfield-Wetherill Park Industrial Estate which is one of Sydney's significant industrial hubs and an important economic and employment centre within the City of Fairfield. Wetherill Park is strategically located between growth areas and major populations in the north-west and south-west of Sydney. The area has a wide range of productive industries and supporting services.

One of the key objectives of Fairfield City Wide DCP (2013) is to encourage and reinforce recycling and waste management principles. The proposed increase in waste volumes meets both these objective by allowing Mainstream Recycling to stay economically competitive, meeting the needs of a changing and growing waste market, while providing a service that is central to waste management and recycling policies.

6.11.2 Impact Assessment

6.11.2.1 Financial Assessment

As described in **Section 4** the proposed changes will allow Mainstream Recycling to meet changing and growing market needs, better servicing government, utility, construction, infrastructure, commercial and industrial sectors. The existing Facility at 6 Sleigh Place is considered most suitable for these activities because:

- The site is compatible with adjacent industrial land uses;
- Re-use of the existing plant and equipment;
- Central location close to arterial roads to decrease transport costs;
- Reduction in costs to the growing Sydney market;
- Generation of beneficial products for recycling;
- Provision of commercial benefits to industrial and commercial clients through sustainable disposal and beneficial reuse of waste products

The financial benefits outlined above justify Mainstream Recycling's investment to make the proposed changes.

6.11.2.2 Economic Assessment

Consistent with the principles of ESD, the economic evaluation compares environmental and social costs and benefits of the project in an economic context. The proposed increase in waste volumes would have the following benefits:

- Reduction in the risk of discharge to sewer or receiving waters;
- Reduction in environmental risks associated with oil, grease and solids entering the sewer and environment;
- Recycling benefit to Sydney via commercial and industrial markets and production of useful by-products by others as appropriate.

Consistent with the objectives of Fairfield LEP (2013) and Fairfield City Wide DCP (2013), the proposed development will complement the existing industries in the Smithfield-Wetherill Park Industrial Estate.

6.11.3 Conclusion

The proposed changes represent the optimal financial option for Mainstream Recycling. By increasing their resource recovery capability, the proposed increase in volumes will improve Mainstream Recycling's competitiveness, with positive economic implications for the local and wider Sydney economy. The economic benefits outlined above indicate that the proposal represents a desirable course of action for the community of Sydney as a whole.

Revision B: No change to the Section 6.11, Economic and Financial Assessment, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6.12 HAZARD & RISK ASSESSMENT

6.12.1 Introduction

A review of items covered under SEPP (Resilience and Hazards) 2021 was carried out for this proposal using *Applying SEPP 33 Hazardous and Offensive Development Application Guidelines* – (DUAP 1997). The focus was primarily on the requirements

for oily water processing and storage, which are identified as potentially hazardous under the Australian Dangerous Goods Code.

Management systems for the existing Facility will be updated if required to reflect the proposed increase in volumes. This will mitigate against any possible issues associated with the proposed increase in volumes at the Facility. Risks associated with public and worker health and safety has been detailed in **Section 6.9**.

Sleigh Place is not within land mapped by NSW Rural Fire Service as bushfire prone (refer to Council Section 149 certificate).

6.12.2 Hazard development evaluation

The proposed change is an increase in volumes to be handled from 29,500 tpa to 65,000 tpa. SEPP (Resilience and Hazards) 2021 requires that a Preliminary Hazard Analysis (PHA) be carried out in accordance with the Multi-Risk Assessment and Hazardous Industry Planning Advisory Papers (HIPAPs) Guidelines stipulated by NSW DPE. The purpose of the PHA is to assess whether the proposed volume of dangerous goods, stored, and the operations that occur, at the Site are offensive or hazardous, thereby posing an unacceptable risk to the surrounding community and landuses.

Dangerous Goods to be stored at the Facility have been assessed against the screening threshold limits outlined in "*Applying SEPP33*", a HIPAP Guideline. The initial screening process determines whether the proposal is potentially hazardous, and provides guidance on the level of analysis required. It is noted that minor quantities of greases, lubricants are stored on site for minor maintenance, and that these are typical of industrial facilities and below the threshold limits.

In the screening threshold limits outlined in "*Applying SEPP33",* combustible liquids are not relevant. Diesel fuel is a C1 combustible liquid, not a flammable liquid, and therefore does not trigger the threshold limit in "*Applying SEPP33"*.

Oily water and recycled oil have much lower flashpoints than diesel. The proposed storage of oily water and recovered oil are therefore well below the thresholds for hazardous development set out in *Applying SEPP33.* Both liquids will be handled and stored in accordance with AS 1940 – 2017 The Storage and Handling of Flammable and Combustible Liquids, and other relevant EPA and WorkSafe standards.

No increase in storage of oily waters is proposed, however throughput will increase. There are no proposed storage volumes or liquids that trigger the threshold limits set out in *Applying SEPP33*, and therefore the PHA concludes the proposed changes will not comprise hazardous development.

The proposed amplification has also been assessed in accordance with the *Fire Safety Guideline – Fire Safety in Waste Facilities* (Fire and Rescue NSW, 2020). This Guideline sets out FRNSW's requirements for:

- Consideration of fire safety during all stages of a waste facility including site selection, planning, design, assessment and operation
- Fire safety systems to be adequate to the special hazards identified within a waste facility and which also meet the operational needs of firefighters
- Safety storage and stockpiling of combustible waste material based on expected combustibility and maximum pile size, and
- Workplace fire safety and fire safety planning, including procedures for the event of fire or emergency incident.

The *Fire Safety in Waste Facility Guidelines* do not directly apply to the proposal, as it (is and) will be a liquid waste treatment facility, and will not store exceed 50m3 of

combustible material. Regular small volumes of saw dust will be brought to site to enhance processing, but not exceed 50m3. Nevertheless, the Guidelines will be reviewed and incorporated into the revised management plans (see below), including consultation with Local FRNSW Bridge for response planning.

6.12.3 Offensive development evaluation

The acceptance of additional liquid waste volumes at the Facility has the potential to cause increased odour and noise impacts at the site, which may be considered offensive. As concluded in **Sections 6.4 and 6.5**, odour and noise impacts from the proposed changes are expected to be negligible, and fully comply with NSW EPA standards and licence conditions.

Additionally an amended Environment Protection Licence will need to be secured from EPA, ensuring appropriate control and regulation of activities at the site. It is therefore concluded that the proposed changes will not be offensive.

6.12.4 Hazard and Risk Assessment Conclusion

The proposed increase in liquid waste volumes at the Facility has been assessed and it is concluded that:

- there are no proposed storage volumes or liquids that trigger the threshold limits set out in *Applying SEPP33*, and therefore the PHA concludes the proposed changes will not comprise hazardous development;
- odour and noise impacts from the proposed changes are expected to be negligible, fully comply with NSW EPA standards and licence conditions. It is therefore concluded that the proposed changes will not be offensive;

The development would be consistent with the objectives of the E4 General Industrial Zoning, as it would not be hazardous or offensive.

Revision B: No change to the Section 6.12, Hazard and Risk Assessment, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

6.13 IMPACT ASSESSMENT CONCLUSION

The main potential for impacts associated with the proposed increased volumes of liquid waste are adverse odour, noise and traffic impacts on the environment and neighbouring land uses.

This EIS assessment concludes adverse impacts are likely to be negligible with the proposed controls, Facility design, operational scheduling, and implementation of Mainstream Recycling's environmental management system (EMS). The Facility will continue to be supervised continuously, audited regularly, and subject to an extensive range of monitoring procedures. Incident management and emergency response procedures will be implemented. Mainstream Recycling has a proud environmental and "good neighbour" record, and its Australian operations are in accordance with ISO-14001 Environmental Management Systems.

The assessment did not identify any adverse cumulative impacts.

Further, public health and safety, and the occupational amenity of neighbouring land

uses, will not be impacted by noise, vectors/pests, or traffic impacts due to extensive and rigorous controls.

Revision B: No change to the Section 6.13, Impact Assessment Conclusion, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

7 MANAGEMENT SYSTEMS AND PROJECT JUSTIFICATION

7.1 MANAGEMENT SYSTEMS

Mainstream Recycling's existing environmental and occupational health and safety management systems keep abreast of legislative changes and governmental regulations. Risk prevention remains a priority, with an internal and external third-party audit system used to check the effectiveness of the management systems.

Mainstream Recycling has operated the existing Facility since 2015, and is proud of its record as being a good neighbour, comprehensive regulatory compliance, and promoting environmentally sustainable development. Mainstream Recycling's environmental management system is operated in accordance with ISO-14000 and ISO-9000 Series requirements. Mainstream Recycling also has AS-4801 accreditation for their occupational health and safety system.

This section describes the environmental and operational management systems and plans (refer to **Appendix K)** for the Facility.

Mainstream, being part of Total Drain Group, relies in part upon the accredited Integrated Management System in place in the parent company which is annually audited and certified by BSI. The Integrated Management System includes an overarching Waste Management Plan to monitor and measure all waste materials produced, reused and recycled and disposed of. This Management Plan defines the procedures for the handling, disposal and tracking of waste materials at the Mainstream Wetherill Park facility to ensure compliance with site Environmental Protection Licence (EPL), Development Approvals (DAs) and other regulatory requirements

This Management Plan is supported by a number of safe work method statements (SWMS) and procedures as listed below and shown in **Figure 7.1**:

- Waste handling process control map
- Waste management processes and waste handling procedures:
  - Truck Discharge SWMS – details a portion of the waste management processes and waste handling procedures
  - Processing SWMS – details a portion of the waste management processes and waste handling procedures
  - Batch Management SWMS - details a portion of the waste management processes and waste handling procedures
  - Facilities Quality Management Plan
  - Recovered Material Sampling SWMS – references the adjusted analyte schedule

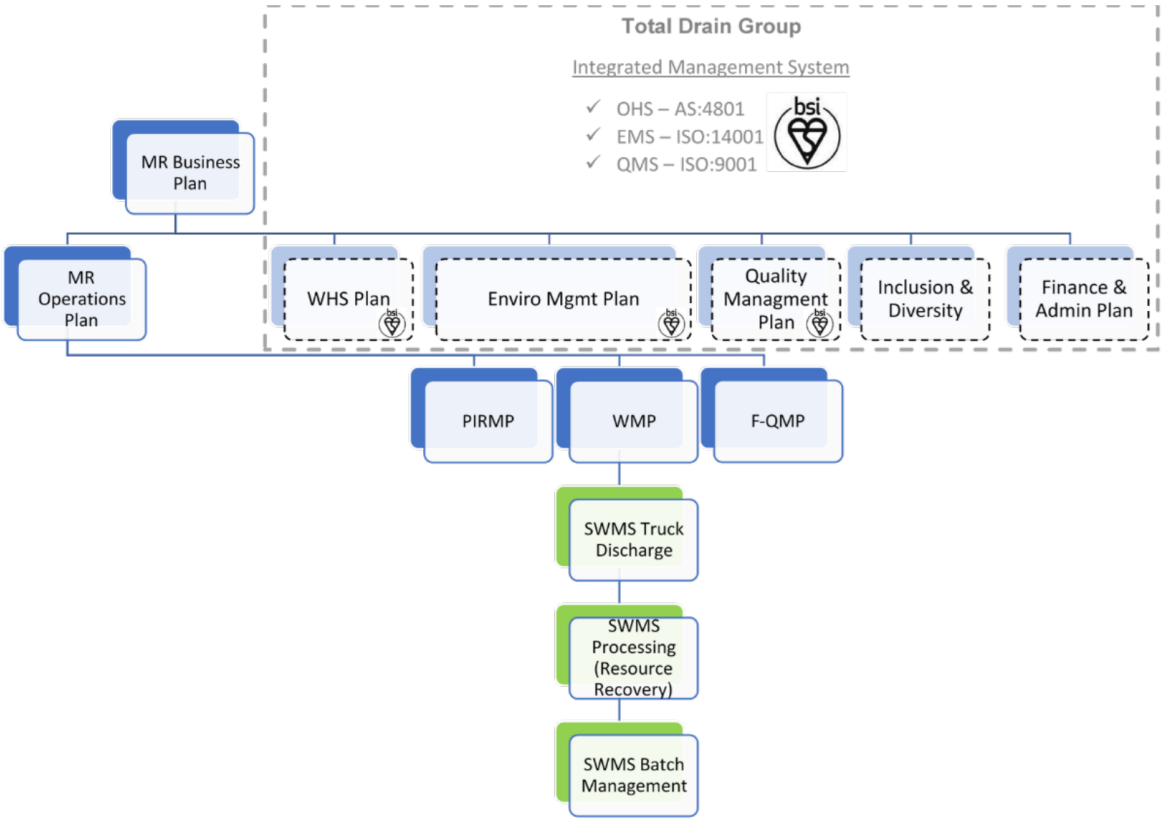

Figure 7.1: Integrated Management System overview

7.2 ENVIRONMENTAL MANAGEMENT PLANS

7.2.1 Construction environmental management plan (CEMP)

As the primary task for the construction phase would be installation of an additional, duplicate air quality scrubber, a CEMP is not anticipated to be necessary for the works. The new, additional carbon filter will be installed by an accredited specialist, with written certification for compliance with manufacturers specifications and electrical wiring provided to Council. No other Building Code of Australia (BCA) certification is required (refer Appendix E). (Fire safety systems and equipment are audited and updated annually as required).

7.2.2 Operational environmental management

Mainstream Recycling will update the existing EMS, where required, to include additional operational safeguards for the increase in waste volumes. All environmental management operational procedures are in accordance with ISO-14001 and AS4801.

Operational management (refer **Appendix K**) includes safety training requirements for employees and detail precautionary measures to be undertaken when working in hazardous conditions.

The EMS is reviewed annually and incorporates the result of any monitoring undertaken in the previous year.

7.3 MONITORING AND AUDITING PROGRAM

Due to the minor nature of construction works required no additional environmental monitoring is anticipated for this stage of the work. Ongoing monitoring will continue to be carried out as required under existing EPA licence conditions for the Facility. Existing operation manuals will be reviewed and updated as appropriate to ensure the processes for the acceptance, handling and transfer of liquid waste and recovered material are adequately monitored.

7.4 INCIDENT MANAGEMENT PLAN

The incident management plan will be reviewed, updated, and tool-boxed to all staff. The updated incident management plan will be included in inductions to new staff, visitors and sub-contractors.

7.5 JUSTIFICATION OF THE PROPOSAL

The EP&A Regulation 2021 requires that an EIS include:

"the reasons, justifying the carrying out of the development of the activity in the manner proposed, having regard to biophysical, economic and social considerations and the principles of ecologically sustainable development."

The following sections justify the proposed increase in volumes according to the EP&A Regulation 2000, as follows:

Biophysical Considerations

By facilitating increased diversion from sewer and landfill if appropriate, the proposed increase in volumes at Mainstream Recycling's Wetherill Park Facility will contribute to both a reduction in the risk of uncontrolled disposal. The proposed changes will also reduce the environmental risks associated with sewer discharge and impacts on the broader environment.

Economic Considerations

The results of the financial and economic analysis indicate that that not only are the proposed changes economically viable, but it provides the best environmental and social outcomes of the options considered (as discussed in **Section 2**).

Social Considerations

The proposed changes will result in social benefits to the wider Sydney community through a reduction in the cost to customers and impact of waste disposal on the environment.

Due to its location within an established industrial estate, the operation of the Facility following the changes, are anticipated to have any negligible impact on social amenity for the surrounding community.

7.6 ECOLOGICALLY SUSTAINABLE DEVELOPMENT

The proposed changes have been designed to be consistent with the four principles of Ecologically Sustainable Development (ESD), whilst fulfilling the commitment expressed firmly in Mainstream recycling's objectives and policies. It complies with NSW Government statutory requirements, Polices and Plans, and the guidelines and standards of the Fairfield City Council.

The ESD principles are discussed below:

Conservation of biological diversity and ecological integrity

The terrestrial habitat has been heavily modified in the past, with little flora or fauna occurring on the site. Several landscaping trees within the front property boundary will be unaffected by the proposal. Potential water and air emissions from the proposal will comply with NSW EPA requirements and will not result in adverse impacts on the environment.

Inter-generational equity

The environmental value of the heavy industrial area is low. The health, diversity and productivity of the local environment will not be impacted as a result of the changes, and so will not compromise the amenity of future generations.

By diverting by-products from sewer and landfill for processing downstream for beneficial re-use if appropriate, and if required safe disposal, the proposed changes are responding to the imperative that future generations should not suffer adversely because of inadequate environmental management by present generations.

Precautionary principle

The implementation of the proposed changes will reduce the quantity of materials disposed to sewer and so reduce the potential for environmental impacts on receiving waters and the broader environment. The precautionary principle was also applied in the environmental assessment process documented in this EIS.

Valuation and pricing of environmental resources

Operation of the Facility following the proposed changes is expected to result in increased benefits to the local economy, including flow on to service sectors, and the increased competitiveness of the Smithfield-Wetherill Park Industrial Estate, as detailed in **Section 4.** The proposal will result in increased net economic benefits when the qualitative valuation of environmental improvements of diverting materials from sewer and landfill as appropriate is taken into account.

7.7 CONCLUSION

The proposed changes have been assessed as being consistent with all the relevant NSW Government and Fairfield City Council planning policies and corporate objectives regarding sustainability. The overall benefits of the project are concluded to be positive.

Revision B: No change to the Section 7, Management Systems and Project Justification, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

Relevant waste management documentation, updated July 2024, as described above has been included in Appendix J. The Operational management plan, previously Appendix K, has been superseded.

Abbreviations

a	annum
AADT	average annual daily traffic
ABS	Australian Bureau of Statistics
AHD	Australian height datum
ANZECC	Australian and New Zealand Environment and Conservation Council
AS	Australian Standard
d	day
dB(A)	decibels (measured in the A scale)
EIS	environmental impact statement
EMP	environmental management plan
EMS	environmental management system
EPA	Environment Protection Authority (now DECC)
EP&A Act	Environmental Planning and Assessment Act (1979)
EP&A Regulation	Environmental Planning and Assessment Regulation (2021)
EPL	Environment Protection Licence
ESD	ecologically sustainable development
g	gram
ha	hectare
HIL	Health Investigation Level
hr	hours
INP	Industrial Noise Policy
ISO	International Standard Organisation
kg	kilogram
km	kilometre
L	litre
LEP	local environmental plan
m	metre
ML	megalitre (1,000,000 litres)
mm	millimetre
No.	number
NPWS	National Parks and Wildlife Service
NSW	New South Wales
C^o	degrees celcius
OU	odour units
PAHs	Polyaromatic Hydrocarbons
PFD	process flow diagram
PHA	preliminary hazard analysis
POEO Act	Protection of the Environment Operations Act (1997)
ppm	concentration expressed in parts per million
s	second
SEE	statement of environmental effects
SEPP	state environmental planning policy
t	tonne
TMP	traffic management plan

Glossary

Commercial and industrial waste: Inert, solid, industrial or hazardous wastes generated by businesses and industries (including shopping centres, restaurants and offices) and institutions (such as schools, hospitals and government offices), excluding building and demolition waste and municipal waste.

Contamination – Concentration of substances above that naturally present that poses, or is likely to pose, an immediate or long-term risk to human health or the environment.

Cumulative impacts – Impacts which are brought about, or increased in strength, by successive additions at different times and in different ways.

Dispersion Modelling – A widely accepted planning tool for determining the air quality impacts of existing and proposed developments.

Economic Evaluation – An analysis of the economic costs and benefits of a proposed activity from the perspective of society.

Ecosystem – A community of living organisms interacting with one another and with their physical environment, such as a rainforest, pond or estuary. An ecosystem can also be thought of as the sum of many interconnected systems such as the rivers, wetlands and bays.

Effluent – The liquid produce of sewage treatment that is discharged into the environment. The quality of effluent provided by the treatment plant will depend on the treatment processes used.

Environmental Impact Statement (EIS) – A formal description of a project and an assessment of its likely impact on the physical, social and economic environment. It included an evaluation of the alternatives and an economic justification of the project. The EIS is used as a vehicle to facilitate public comment and as the basis for analysing the project with respect to granting approval under relevant legislation.

Environmental Management Plan (EMP) – Plan prepared prior to commencement of work detailing approvals, specific environmental safeguards, responsibility for implementation and the overall management of environmental issues in relation to the project.

Hazard – A possible source of danger or risk.

Hydrology – Study of the properties of the earth's water, especially of its movement in relation to land.

Landfill site – A waste facility used for the purpose of disposing of waste to land.

Leachate – Liquid released by, or water that has percolated through, waste, and that contains dissolved and/or suspended liquids and/or solids and/or gases.

Liquid – Any substance that does not meet all of the criteria of *non-liquid*, and that is not a gas.

Mitigation – to become milder, less intense or less severe.

Organic waste – Includes wood, garden, food, animal, vegetative and natural fibrous material wastes and biosolids.

Processing – Subjecting a substance to a physical, chemical or biological treatment or a combination of treatments.

Proponent – The person or body proposing to carry out a development or activity.

Recycling – The processing of waste into a similar non-waste product.

Reuse – Waste reused with or without cleaning and/or repairing.

Sludge – Materials that have settled to the bottom of a waste treatment device.

Trade Waste – Liquid waste from industry discharged into the sewerage system.

Trade Waste Agreements – Agreements reached between Sydney Water and industrial and

commercial customers to restrict the amount of toxic and other potentially harmful substances discharged to the sewerage system.

Treatment – The processing of waste into a different type of waste.

Waste activity – Defined Schedule 1 of the Protection of the Environment Operations Act 1997.

Wastewater – Water that contains waste products, such as sewage, industrial runoff and process water.

References

Department of Planning, Industry and Environment 2021a, *NSW Waste and Sustainable Materials Strategy 2041*, NSW Government

Department of Planning, Industry and Environment 2021b, *State Significant Development Guidelines*, July 2021 NSW Government

Department of Planning, Industry and Environment 2021c, *State Significant Development Guidelines – preparing an environmental impact statement,* Appendix B to the state significant development guidelines, July 2021 NSW Government

Department of Planning 2011, *Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines*, NSW Government

Fire and Rescue NSW 2019, *Planning for Bushfire Protection 2019*, Fire and Rescue NSW

Fire and Rescue NSW 2020, *Fire Safety Guideline – Fire Safety in Waste Facilities*, Fire and Rescue NSW.

NSW Roads and Traffic Authority 2002 as updated, *Guide to Traffic Generating Developments*, NSW Government

Standards Australia 2004 AS/NZS 2890.1 *Parking Facilities Part 1 – Off-street Parking*, Standards Australia

Standards Australia 2018 AS/NZS 2890.1 *Parking Facilities Part 2 – Off-street Commercial Vehicle Facilities*, Standards Australia

Western Sydney Public Health Unit (WSPHU) 1998, *Waste Management Guidelines for Health Care Facilities Doc. PD2005_132,* NSW Health

Appendix A: Secretary's Environmental Assessment Requirements

Appendix A: Secretary's Environmental Assessment Requirements (SEARs No. 1369)	**Where in EIS**
SEAR No. 1369: Proposal Increasing processing capacity of an existing stormwater receival and treatment facility to 65,000 tonnes per annum (tpa). **Location:** No 6 Sleigh Place, Wetherill Park (Lot 6 DP 792007) **Applicant:** Mainstream Recycling Pty Ltd Date of Issue 11 December 2020 **General Requirements:** The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000.	
Key Issues: The EIS must include an assessment of all potential impacts of the proposed development on the existing environment (including cumulative impacts if necessary) and develop appropriate measures to avoid, minimise, mitigate and/or manage these potential impacts. As part of the EIS assessment, the following matters must also be addressed:	
• **strategic and statutory context** – including:	
-detailed justification that the proposal	Section 2
a detailed justification for the proposal and suitability of the site for the development	Section 3.1
a demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, development control plans (DCPs), or justification for any inconsistencies	Section 4
a list of any approvals that must be obtained under any other Act or law before the development may lawfully be carried out.	Section 4
a description of any amendments to and/ or additional licence(s) or approval(s) required to carry out the proposed development.	Section 4
• **suitability of the site** – including:	
a detailed justification that the site can accommodate the proposed processing capacity, having regard to the scope of the operations and its environmental impacts and relevant mitigation measures	Section 3.1
a detailed site plan and floorplans depicting the proposed internal layout, including the location of machinery and equipment.	Section 3.1
• **waste management** – including:	
details of the type, classification, quantity, source, maximum volume and throughput of waste to be received at the site	Section 3.1 & Appendix J (Waste Management Plan)
detailed description of waste processing procedures for each type of waste	Section 3.1
details of the resource outputs and any additional processes for residual waste	Section 3.1
details of waste handling including transport, identification, receipt, stockpiling and quality control	Section 3.1
the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the NSW Waste Avoidance and Resource Recovery Strategy 2014-21.	Sections 3.1, 6.10 & Appendix J
• **soil and water** – including: - a description of local soils, topography, drainage and landscapes	Section 6.2
details of stormwater, leachate, and wastewater management	Section 6.2
details of sediment and erosion controls	Section 6.2
consideration of the impacts to surface and groundwater resources, flooding impacts, and impacts to groundwater dependant ecosystems as a result of the increase in processing	Section 6.2
a description and appraisal of impact mitigation and monitoring measures.	Section 6.2

• **air quality and odour** - including:	
a description of all potential sources of air and odour	Section 6.4 & Appendix G.
Emissions: an updated air quality impact assessment and odour impact assessment in accordance with relevant Environment Protection Authority guidelines	
a description and appraisal of air quality and odour impact mitigation and monitoring measures.	
• **noise and vibration** – including:	
- a description of all potential noise and vibration sources, including increased processing and truck movements	Section 6.5 & Appendix H.
− an updated noise and vibration assessment in accordance with the relevant Environment Protection Authority guidelines	
− a description and appraisal of noise and vibration mitigation and monitoring measures.	
• **traffic and transport** – including	
− details of road transport routes and access to the site	Section 6.6 & Appendix I.
− road traffic predictions for the development during operation	
− an assessment of impacts to the safety and function of the road network and the details of any road upgrades required for the development.	
• **hazards and risk** – including:	
− a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011).	Sections 6.6, 6.12
• **fire and incident management** – including:	
− technical information on the environmental protection equipment installed on the premises such as air, water and noise controls, spill clean-up equipment, fire management (including the location of fire hydrants and water flow rates at the hydrants) and containment measures	Section 6.10, 6.12 & Appendix J (Waste Management Plan)
− details of the size and volume of stockpiles and their arrangements to minimise fire spread and facilitate emergency vehicle access	
− an assessment of the risk of bushfire, including addressing the requirements of Planning for Bush Fire Protection 2019. Any proposed Asset Protection Zones must not adversely affect environmental objectives (e.g. buffers).	
• **biodiversity** – including a description of any potential vegetation clearing needed to undertake the proposal and any impacts to flora and fauna.	Section 6.3
• **visual** – including a description of the private receptors and public vantage points.	Section 6.8
• **heritage** – including Aboriginal and non-Aboriginal cultural heritage	Section 6.7
Environmental Planning Instruments and other policies: The EIS must assess the proposal against the relevant environmental planning instruments, including but not limited to: • State Environmental Planning Policy (Transport and Infrastructure) 2021 • State Environmental Planning Policy (Resilience and Hazards) 2021 • Fairfield Local Environmental Plan 2013 • relevant development control plans and section 7.11 plans.	Section 6.4
Consultation: During the preparation of the EIS, you must consult the relevant local, State and Commonwealth government authorities, service providers and community groups, and address any issues they may raise in the EIS. In particular, you should consult with the:	Section 5

• Department of Planning, Industry and Environment, • Environment Protection Authority • Transport for NSW • Fairfield City Council • the surrounding landowners and occupiers that are likely to be impacted by the proposal. Details of the consultation carried out and issues raised must be included in the EIS	
The EPA's key information requirements for the project must include an adequate description and assessment of: • Impacts on air quality (odour) and odour control systems	Section 6.4 & Appendix G.
Leachate management	Section 6.2
• Waste management	Section 6.10 & Appendix J.
• Noise impacts from increased operational hours	Section 6.5 & Appendix H.
NSW EPA (Regulation)	
• Air Quality Impact Assessment – Documentation of the controls and the management practices that will be used to manage odour emissions. • Water Quality – Documentation of leachate controls and discharge arrangements. • Waste - Documentation of all aspects of waste generation, management and disposal associated with the proposed development to demonstrate compliance with all regulatory requirements of the Protection of the Environment Operations Act (1997) and associated waste regulations. This should also include any proposed transfer of waste and/or wastewater between premises. • Noise – Consideration of, and assessment where necessary, of the increased operational hours on any sensitive receivers.	Section 6.4 & Appendix G. Section 6.2 Section 6.10 & Appendix J (Waste Management Plan) Section 6.5 & Appendix H.
NSW EPA (Waste & Resource Recovery)	
1. Waste Management	Section 6.10
2. Waste Types	Sections 3, 6.10. & App. J
3. Water Management	Section 6.2
4. Air Quality	Section 6.4 & App. J.
5. Noise	Section 6.5
Transport for NSW (TfNSW)	
1. Daily and peak traffic movements likely to be generated by the proposed development including the impact on nearby intersections and the need/associated funding for upgrading or road improvement works (if required).	Section 6.6 & Appendix I (Table 1.1).
2. Roads and Maritime requires the reports to assess the implications of the proposed development for non-car travel modes (including public transport use, walking and cycling); the potential for implementing a location-specific sustainable travel plan (e.g.; Green Travel Plan, 'Travelsmart' or other travel behaviour change initiative); and the provision of facilities to increase the non-car mode share for travel to and from the site. This will entail an assessment of the accessibility of the development site by public transport.	
3. The transport and traffic study must properly ascertain the cumulative study area traffic impacts associated with the development (and any other known	

proposed developments in the area). This process provides an opportunity to identify a package of traffic and transport infrastructure measures required to support future development. Regional and local intersection and road improvements, vehicular access options for adjoining sites, public transport needs, the timing and cost of infrastructure works and the identification of funding responsibilities associated with the development should be identified.	
4. Details of the proposed accesses and the parking provisions associated with the proposed development including compliance with the requirements of the relevant Australian Standards (ie: turn paths, sight distance requirements, aisle width, etc)	
5. Proposed number of car parking spaces and compliance with the appropriate parking codes.	
6. Details of light and heavy vehicle movements (including vehicle type and likely arrival and departure times).	

Appendix B: Statutory Requirements Compliance (SEARs No. 1369) Form & Content of the EIS.

Appendix B: Statutory Requirements Compliance (SEARs No. 1369)	**Where in EIS**
SEAR No. 1369: Proposal Increasing processing capacity of an existing stormwater receival and treatment facility to 65,000 tonnes per annum (tpa). **Location:** No 6 Sleigh Place, Wetherill Park (Lot 6 DP 792007) **Applicant:** Mainstream Recycling Pty Ltd Date of Issue 11 December 2020 **General Requirements:** The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (now Division 5 of *Environmental Planning & Assessment Regulation* 2021).	
Form of the environmental impact statement	
1. An environmental impact statement must contain the following information:	
the name, address and professional qualifications of the person by whom the statement is prepared:	Certification page
the name and address of the responsible person,	Certification page
the address of the land in respect of which the development application is made, or which the activity or infrastructure to which the statement relates is to be carried out	Certification page
a description of the development, activity or infrastructure to which the statement relates	Certification page & Project Summary Table.
an assessment by the person by whom the statement is prepared of the environmental impact of the development, activity or infrastructure to which the statement relates, dealing with the matters referred to in this Schedule	Certification page
a declaration by the person by whom the statement is prepared to the effect that: i. the statement has been prepared in accordance with this Schedule, and ii. ii. the statement contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and iii. iii. that the information contained in the statement is neither false nor misleading.	Certification page
Content of the environmental impact statement	
1. An environmental impact statement must also include each of the following:	
a summary of the environmental impact statement	Summary
a statement of the objectives of the development, activity or infrastructure	Summary & Sections 2.1, 3.2
an analysis of any feasible alternatives to the carrying out of the development activity or infrastructure, having regard to its objectives, including the consequences of not carrying out the development, activity or infrastructure	Section 2
An analysis of the development, activity or infrastructure, including:	
i. a full description of the development, activity or infrastructure, and	Section 3
ii. a general description of the environment likely to be affected by the development activity or infrastructure, together with a detailed description of those aspects of the environment that are likely to be significantly affected, and	Section 6.1
iii. the likely impact on the environment of the development, activity or infrastructure, and	Section 6
iv. a full description of the measures proposed to mitigate any adverse effects of the development, activity or infrastructure on the environment, and	
v. a list of any approvals that must be obtained under any other Act or law before the development, activity or infrastructure may lawfully be carried out,	Section 3.2.1
compilation (in a single section of the environmental impact statement) of the measures referred to in item (d)(iv),	Appendix C

– the reasons justifying the carrying out of the development, activity or infrastructure in the manner proposed, having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development	Section 7.6
Subclause (1) is subject to the environmental assessment requirements that relate to the environmental impact statement.	SEARs are addressed throughout (refer to Appendix A: SEARs compliance table.
Principles of ecologically sustainable development	Section 7.6

Appendix C: Mitigation Measures

Minimal works are required to implement the proposed amplification: an additional carbon odour control unit would be installed. Other changes will be a necessary approvals and management measures, including:

- Certification as required for occupancy and compliance with consent conditions;
- Seeking an amendment to EPL# 20694, and compliance with any EPA requirements from the General Terms of Approval. Continued monitoring and reporting requirements to EPA;
- Seeking an amendment to Trade Waste Agreement, and compliance with any Sydney Water requirements. Continued monitoring and reporting requirements to Sydney Water;
- Laison with F&R NSW, continued annual certification of Fire Protection systems and processes;
- Updating all management plans and systems, certification, training, implementation and monitoring;
- Implementing all mitigation measures from public health and safety (as summarised in Table 6.1 of this EIS;
- Implementation and compliance management of any commitments or requirements arising from the assessment and response to consent process with agencies, authorities, stakeholders, neighbours and Council.

Revision B: No change to the Appendix C, Mitigation Measures, is considered necessary to the application for the replacement of street sweeping waste with stormwater waste.

The Waste Management Plan, updated July 2024, would be revised to include the approval and conditions, and submitted to support the NSW EPA Licence amendment application.

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