**SLR Consulting Australia**
10 king St, New Lambton

29 May 2024

SLR Ref No.: 630.030773

Attention: Matthew O'Donnell
Mod Urban
Shop 1, 118 Macpherson St, Bronte 2024

SLR Project No.: 630.030773

## RE: Smithfield Tyre Recycling Centre – 68-70 Victoria Road Response to EPA Request for Additional Information

This letter provides additional information on surface water relating to the SLR Surface Water Assessment and an EPA request for additional information dated 20 February 2024.

The EPA comments/requests are shown in italics below, and SLR response in blue text.

*The SEARs provided by the EPA requested details on what measures were proposed to mitigate potential impacts of the development on natural or artificial waterways. The SEARS also outline that the Applicant must describe how stormwater will be managed throughout all phases of the project, including details on how stormwater and runoff will be managed to minimise pollution. The EPA notes, the Surface Water Assessment provides some details relating to potential impacts and recommended mitigation measures, however the Applicant has not yet provided a Stormwater Management Plan.*

The Surface Water Assessment was intended to include the attached plan which indicates details of proposed stormwater and wastewater controls. Maintenance activities would include:

**a)** Periodic sweeping/vacuuming of external hardstands and trafficked areas under roof to prevent visible accumulation of sediments. Maximum interval 3 months.

**b)** Inspect condition of pit baskets and GPT following rainfall events with greater than 20mm rainfall depth or maximum interval 3 months. Remove materials accumulated on filter when over 70% full.

**c)** Inspect condition of GPT at maximum interval 6 months. Remove accumulated sediments and hydrocarbons when storage over 70% full

**d)** Washdown of internal slabs so that there is no visible accumulation of dirt or dust on the surface that is likely to result in wheel-tracking to external areas. Maximum interval 1 per month.

**e)** Inspect condition of wastewater bunds on an annual basis and repair any defects such as cracking

*In addition, there are some contradictions and/or lack of information within the documents provided by the Applicant regarding surface water and management which includes:*

a) *Whether the external area at 70 Victoria Street is paved or compacted soil. The Fire and Incident Management Report states that 70 Victoria Street will be paved, while the EIS stated the external surface area will be compacted soils.*

The external hardstand will be a sealed surface.

b) *The Fire and Incident Management Report and Surface Water Assessment both outline that the premises boundary will be bunded with only minimal details provided.*

The bund is required to be a minimum height of 400mm. This requirement is largely met by an existing blockwork bund along the property boundary. Minor extensions of the bund will be required to impound water on the surface in areas inundated when the shut-off valve is shut (in the case of fire).

c) *The documentation lacks information on how clean water and wastewater at 70 Victoria Street will be managed to prevent contamination of clean water.*

The Stormwater Management Plan is now attached:

- Clean water from roof runoff will be directed via existing pipework to the stormwater system.
- Wastewater from wash-down activities across under-roof areas where waste is stored will be collected in blind sumps, and discharged to the sewerage system under a trade waste agreement with Sydney Water.
- Stormwater from external hardstand areas will be directed to a GPT to be treated prior to discharge to Council's stormwater system. To minimize pollutant load to the GPT, the external hardstand areas will be kept clean using a small street sweeper to remove any accumulation of dirt.

*The Applicant has not appropriately addressed the SEARS and the potential impacts of discharges on the environmental values of the receiving waterway consistent with the National Water Quality Guidelines (ANZG, 2018).*

The potential water quality impacts are identified in the table in Section 13.3.3.2 of the Surface Water Assessment. The Surface Water Assessment:

- identifies the WQO's relevant to this catchment and the associated default water quality values in accordance with ANZECC (2000).
- Describes a proposed water quality mitigation measures include a) isolation of wastewater and discharge to the sewerage system b) periodic cleaning of hardstand areas

( with removal of collected dirt off-site) c) litter baskets on stormwater inlets, and d) a gross pollutant trap.

- Gives a commitment to monitor and report water quality over the first 12 months of operation, and install additional mitigation measures if there are exceedances of the water quality values.

SLR note that this monitoring should include a full suite of analytes and not be limited to the specific physio-chemical parameters noted in the report.

SLR also note that it is not meaningful to analyse the theoretical performance of the proposed mitigation system and predict concentrations of pollutants in treated runoff, without knowing what the unmitigated water quality would be.

The GPT proposed for this site was a Humegard HG12. SLR recommend upgrading this to a HumeCeptor, which provides improved retention of TSS, TP and TN, as well as retention of TPH.

*The EPA requires the following to be addressed:*

1. *provide a copy of the stormwater management plan, which describes how stormwater will be managed throughout all phases of the project, including:*

***i)*** *details on how stormwater and runoff will be managed to minimise pollution. With considering the guidelines Managing urban stormwater: soils and construction, vol. 1 (Landcom 2004) and vol. 2 (A. Installation of services; C. Unsealed roads; D. Main Roads) (DECC, 2008).*

***ii)*** *details on where wastewater will be generated and how it is collected to be diverted to the reticulated Sydney Water sewerage system.*

***iii)*** *provide further details relating to the stormwater shut off valve, including but not limited to its location, how it is operated, who will have access and how it will be isolated.*

***iv)*** *provide information on how wastewater will be diverted away from clean water at 70 Victoria Street.*

A copy of the stormwater management plan is attached:

i) The Surface Water Assessment report and Stormwater Management Plan identify the surface water measures for the operational phase of the project. The disturbance area during construction will be small and not large enough to warrant a sediment basin. The potential for erosion will be limited by a) the short exposure period b) surfaces comprising granular (pavement) materials. Proposed sediment controls will include a) sediment fencing on downslope perimeter b) sand bagging and geotextile bunds around stormwater inlet pits.

ii) Wastewater will be generated from washdown of operational areas under roof, including those on Lot 68, and on Lot 70. Blind sumps will be used to collect wastewater, and wastewater will be contained within each area by a perimeter bund.

iii) The existing stormwater shut off valve comprises a simple sluice gate on the downstream side of the pit, which is manually activated. Anyone with physical access to the location could activate the shut-off.

iv) As per item ii) above

2. ***provide information on whether the external area is paved or compacted soil. If compacted soil, provide further justification on how this will achieve the same or better outcomes to paved, including capture of wastewater and how the surface area would be maintained to prevent erosion and sediment tracking.***

This area will have a sealed pavement.

3. ***provide additional information as to whether the stockpiled area external to the building under an awning is paved and bunded.***

This area will have a sealed pavement or concrete slab.

Should you wish to discuss the above please contact the undersigned

Regards,

**SLR Consulting Australia**

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Attachments : Stormwater Management Plan