

3 April 2019

Nikki Matthews
Planning Officer
Department of Planning and Environment
320 Pitt Street
Sydney NSW 2001

Re: SSD 7733 - Response to EPA submission dated 18 March 2019

Dear Ms Matthews,

This letter is in response to the Environment Protection Authority's (EPA) letter dated 18 March 2019 (their reference DOC19/224320) regarding Penrith Waste Recycling and Transfer Facility (the facility). In their letter, EPA confirmed that the following are acceptable:

- a maximum of 1,500 tonnes of waste on site at any one time;
- misting sprays within the main shed instead of water sprinklers; and
- standard roller doors that are not required to be shut during operational hours.

The EPA also stated that general solid waste (non-putrescible) (GSW NP waste) should not be accepted by the facility and that specific waste types should be identified. As per the response to submissions (RTS) and previous submissions, the GSW NP had been put forward due to the need for the facility to accept general unsegregated loads from building and demolition projects, as well as individuals and businesses.

Benedict Recycling has previously accepted the EPA's requirement for the facility to be fully enclosed. This completely removes most of the potential pathways for pollutants to leave the site.

With respect to the EPA's concern regarding assessments for specific waste types, Benedict Recycling proposes that the facility be able to accept the materials listed in Table 1, below. These waste types have been approved for acceptance by similar Benedict Recycling facilities and are currently handled without issue.

The waste types requested are generally pre-classified according to the *Waste Classification Guidelines Part 1: Classifying waste* (EPA 2014) (the guidelines). Where waste is not pre-classified, definitions are provided with reference the guidelines where possible.

No materials proposed to be received are hazardous to handle or will be permitted to be dispatched from the site in an unapproved manner. As described in the environmental impact statement and RTS, all incoming loads will be inspected multiple times before being accepted. If non-conforming waste is identified after a load is accepted, it will be stored in the non-conforming waste area and disposed of as described in Section 4.1.3 of the RTS.

Table 1 **Materials to be accepted by the facility**

Waste type	Note
Asphalt waste	<p>Asphalt waste is not specifically included in the Building and Demolition waste type, but is a pre-classified waste. It very likely to form part of loads from infrastructure construction and/or demolition projects.</p> <p>Inclusion will also allow acceptance of minor quantities of asphalt likely to be included in sweepings or other tertiary sources.</p>
Building and demolition waste	As previously approved by EPA.
Cement fibre (no asbestos)	<p>Cement fibre is a type of reinforced cement sheeting used commonly in internal and external applications. As per the RTS, no asbestos will be accepted.</p> <p>Cement fibre is likely to be included in building and demolition waste, and as such, should also be able to be accepted from individuals and businesses that are undertaking minor clean-up works not associated with building or demolition.</p>
Concrete waste from a batch plant	<p>Cured or hardened concrete is concrete that is generally 'left over' from a concrete pour or otherwise unused at a concrete batching plant. It is useful for crushing as a form of aggregate. As with all waste on site, it will be handled and stored within the enclosed building and not exposed to rainfall.</p> <p>Concrete wash water and liquid wash-out will not be accepted by the facility.</p>
Electronic waste (intact end-of-life electronic equipment)	<p>Electronic waste is not a pre-classified waste type, but small amounts of electronic waste are likely to be received as part of demolition and household deliveries.</p> <p>No more than one tonne of intact electronic waste will be kept on site at any one time. The waste will be kept separated in the hand unload area in a small bin and periodically sent to an electronic waste recycler.</p> <p>Non-intact electronic waste will be refused.</p>
Excavated Natural Material that meet the CT1 thresholds as per the guidelines	<p>Excavated natural materials are not pre-classified waste types.</p> <p>Building and demolition projects are likely to include excavated natural materials from around the building or demolition site. This may include larger rocks and stones that would be suitable for production of road base and other products after processing.</p> <p>The guideline's CT1 thresholds identify the requirements for 'general solid waste' and measure contaminants in the order of milligram per kilogram of material and are commonly referred to in EPLs to aid in the definition of the waste type.</p> <p>Given the need to be able to accept excavated materials at the facility, CT1 thresholds are a reasonable standard for defining the waste type.</p>
Garden waste	As previously approved by EPA.
Glass, plastic, rubber, plasterboard, ceramics, bricks, concrete or metal	<p>This is a pre-classified waste type. With the exception of rubber, plasterboard and ceramics, these are explicitly permitted in the building and demolition waste type. We understand that the building and demolition waste type permits acceptance of these common types of waste associated with demolition of buildings (eg tiles, plasterboard and fittings).</p> <p>Inclusion will allow for uniform handling and acceptance of comingled building and demolition and non-building and demolition loads.</p>
Grit, sediment, and gross pollutants from stormwater treatment devices/management systems that have been dewatered	<p>Material from stormwater treatment devices and management systems that have been dewatered may be used to partly form products derived primarily from soils or fines. Gross pollutants are separated and recycled or sent to landfill as required.</p> <p>No liquid waste or putrescible waste will be accepted by the facility.</p>
Household waste, including municipal pickup waste (no food waste)	<p>This waste type is based on the pre-classified waste type 'household waste from municipal clean-up that does not contain food waste'. The pre-classified waste type for municipal clean-up would exclude householders from delivering waste directly, that would ultimately lead to more waste being sent to landfill from the facility.</p> <p>As modified, it will allow households and Councils to bring a mixed load of non-food waste to the facility. Individual loads will often be small and will be hand-unloaded and inspected by site personnel. Council loads are usually delivered in rear-lift compactor trucks. Minor quantities of unrecyclable materials will be able to be accepted by the facility and diverted to the light waste stockpile directly. Liquid, hazardous or putrescible waste would trigger a load to be rejected.</p>

Table 1 **Materials to be accepted by the facility**

Waste type	Note
Paper or cardboard	As previously approved by EPA.
Rail ballast	Rail ballast is a common material sourced from infrastructure projects and may be re-used for rail or road infrastructure.
Soils that meet the CT1 thresholds as per the guidelines	<p>This waste type would be detailed as per other Benedict Recycling facility EPL's.</p> <p>Building and demolition projects are very likely to include soils from around the building or demolition site, though the building and demolition waste type specifically excludes excavated soils.</p> <p>The guideline's CT1 thresholds identify the requirements for 'general solid waste' and measure contaminants in the order of milligram per kilogram of material and are commonly referred to in EPLs to aid in the definition of the waste type.</p> <p>Given the need to be able to accept soils at the facility, CT1 thresholds are a reasonable standard for defining the waste type.</p>
Timber waste (as defined by building and demolition waste)	<p>The pre-classified waste 'wood waste' does not allow for the acceptance of wood treated with chemicals. The building and demolition waste definition for timber includes timber treated with chemicals such as copper chrome arsenate, high temperature creosote, pigmented emulsified creosote and light organic solvent preservative. These chemicals are associated with preserving outdoor wood applications, such as decks.</p> <p>Inclusion of this as a separate line item will allow for simpler handling and acceptance of waste and allow for non-building and demolition deliveries to be treated the same way as building and demolition deliveries.</p>
Tyres	<p>Tyres are anticipated to be received occasionally and will be stored and dispatched to specialist tyre recyclers. No whole loads of tyres or loads comprising predominately of tyres will be accepted.</p> <p>No more than two tonnes of tyres will be kept on site at any one time, only enough to form a dispatchable load. Tyres will be kept separated to the east of the light waste area.</p>
VENM	As previously approved by EPA.
Wood waste	As previously approved by EPA.

We trust that the waste type list and justifications are satisfactory for the assessment of the facility. Should you have any questions, I can be contacted at 9493 9515 or at the email address below.

Yours sincerely



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Senior Planner

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