



EPA Reference: DOC20/280538-3

Mr Stephen Barry
Director Planning
Independent Planning Commission
Level 3, 201 Elizabeth Street
SYDNEY NSW 2000

Attn: casey.joshua@ipcn.nsw.gov.au

By Email

8 April 2020

Dear Mr Barry

**Genesis Waste Management Facility Modification 6 (MP 06_0139 MOD 6)
[Modification Request]**

I refer to the meeting with the Independent Planning Commission (Commission) on 31 March 2020 in relation to the Genesis Waste Management Facility Modification 6 (MP 06_0139 MOD 6) [Modification Request] and two questions on notice taken by the NSW Environment Protection Authority (EPA).

The EPA provides the following responses to the questions on notice:

Question 1: Sealed Haul Roads to Landfill sites:

The Commission is seeking to understand appropriate practices in relation to dust mitigation and haul roads for landfill sites. Is the EPA aware of any other landfill sites or facilities similar to the Genesis operations that have or are required to construct sealed haul roads?

EPA response:

The EPA is not aware of other similar landfill sites that incorporate sealed haul roads within the void area.

Whilst sealing haul roads and/or use of conveyors are considered to be best practice dust mitigation options for landfill sites or facilities similar to Genesis, specific engineering or project constraints might mean that alternative feasible and practical approaches that achieve the desired outcomes are acceptable with ongoing review.

Question 2: Department's proposed Condition 37a:

At the meeting with the Commission, the EPA discussed suggested amendments to the Department's proposed Condition 37a to align with the EPA's processes and policies/guidelines. Please provide these suggested amendments to the proposed Condition 37a for the Commissions consideration.

EPA response:

The EPA is broadly supportive of the proposed condition for an air quality audit; however suggest some amendments to the condition could be made to:

- better align with the EPA's regulatory framework requiring that fugitive emissions be prevented and minimised as far as practicable at all times and not only when exceedances of limits occur;
- better align with EPA guidance that best management practice be implemented to reduce emissions as far as practicable when exceedances of EPA's impact assessment criteria are predicted in the impact assessment prepared as part of the development application;
- provide ongoing requirements as a method for continual improvement;
- maintain consistency with standard environment protection licence conditions requiring the premises be maintained, and activities be undertaken, in a manner the prevents or minimises the emission of dust.

The following incorporates suggested edits to draft condition 37a encompassing the above considerations.

37a. Within six months of the approval of 06_0139 MOD 6, and every two years thereafter, the Proponent must prepare a site-wide air quality audit to the satisfaction of the Planning Secretary. The audit must:

- a) be undertaken by suitably qualified, experienced and independent expert;
- b) be prepared in consultation with the EPA;
- c) audit all aspects of the project with the potential to generate significant air emissions;
- d) assess the current operation against the air quality impact predictions in the AQIA (Ramboll Australia Pty Ltd, dated August 2018);
- e) review and benchmark on-site mitigation measures, management practices and operations against best practice for air quality management and opportunities for continuous improvement;
- f) compare any emissions with limits in this approval;
- g) Where the review conducted in sub-clause (e) identifies current mitigation measures or management practices are not consistent with best practice, the air quality audit must identify additional mitigation measures to prevent and minimise emissions as far as practical. This includes consideration of:
 - sealing parts of or all site haul roads;
 - installation and/or upgrade of conveyors and associated dust suppression systems
 - non-road diesel equipment and diesel combustion emission controls
 - additional reactive management measures including but not limited to temporarily ceasing or altering operations or site practices
- h) specify a timeframe for when any mitigation measures identified in sub-clause g) will be implemented; and
- i) inform the update to the Air Quality, Odour and Greenhouse Gas Management Plan required under Condition 37 of Schedule 3

Please contact Lara Barrington 9995 5713 if you have any questions or submit written responses to waste.operations@epa.nsw.gov.au

Yours sincerely



8 April 2020

ROB HOGAN
Manager Regulatory Operations Metropolitan West
Environment Protection Authority