Proposed E-Waste Recycling Facility: Change of Use

8 Kommer Place, St Marys 2760

Ace Recycling Group Pty Ltd

Statement of Environmental Effects

August 2021

Wild Environment Pty Ltd
Level 1, 85 Annandale NSW 2038
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SUMMARY

This Statement of Environmental Effects (SEE) has been prepared to support the Change of Use Development Application to Penrith City Council for Ace Recycling Group Pty Ltd (Ace Recycling) to accept and recycle electronic waste (e-waste) at 8 Kommer Place, St Marys, NSW 2760.

Ace Recycling is proposing to Change the Use of 8 Kommer Place, St Marys, from:

- the existing approved use for recycling of paper, cardboard and plastic material (DAs 11/0362 and DA 16/1240) to
- recycling of up to 5,900 tonnes per annum of e-waste and plastic.

Less than 1,000 tonnes or 1,000 cubic metres of waste would be stored at any one time. No change is proposed for 7 Kommer Place (truck and vehicle parking).

E-waste recycling activities would largely comprise acceptance and dismantling of whole e-waste units (TVs, computers, stereos etc) into their component parts; primarily plastics, printed circuit boards, glass, batteries and metal. These would be sorted and sent to downstream recyclers for further processing.

Ace Recycling

Ace Recycling is an established Australian company with a strong market presence in electronics recycling and stewardship. Ace Recycling operates similar facilities in Smithfield, NSW, Victoria and Queensland, specialising in the recycling of end-of-life IT products (e-waste) such as PCs, printers, laptops, servers, mobile phones, and associated peripherals.

The Site

Ace Recycling has recently expanded its Sydney presence with the lease of an established industrial recycling facility at 8 Kommer Place St Marys. The 5650 square metre site (Lot 191/DP1135763) is zoned IN1, General Industrial, under Penrith Local Environmental Plan (LEP, 2010), which is suitable for waste or resource management facilities, and surrounded by a mixture of light and heavy industrial landuses. Kommer Place is within an established industrial area which permits a wide range of manufacturing activities.

The site at 8 Kommer Place and existing buildings are well-suited to the proposed recycling operations, and no building works, alterations or additions are proposed.

Proposed Use

Unloading and load-out would be carried out within the site, with storage of segregated products stored within buildings or under existing external awnings. Up to 5,900 tonnes per annum of electronic waste will be accepted from Councils, government agencies and businesses, especially under the National Television and Computer Recycling Scheme (NTRCS). The e-waste products will be dismantled and sorted within existing buildings. All by-products will be transported off-site to specialist recyclers for reuse.

Operations would be primarily from 8am to 4pm Monday to Friday, and would generate negligible noise or air emissions beyond the site boundary.

Approximately twenty (20) staff will be employed in total, including two management personnel. No off-site staff parking will be required, as there is ample parking is available on-site and 7 Kommer Place, including disabled and visitor parking, to comply with existing Consent and Council DCP requirements. Existing facilities would be used for office

requirements and amenities. No changes to site utilities (gas, electricity, water, sewage) are required.

Environmental Assessment

Environmental assessment concludes that the proposed changes would have negligible environmental and community impact, and no adverse impacts on neighbouring land uses. The changes are concluded to be consistent with all planning instrument requirements, and would enable greater recycling within the St Marys Industrial Estate and across Sydney.

The project has been assessed in terms of the principles of ecologically sustainable development, as required by legislative and Ace 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:

- Provide greater environmentally responsible and sustainable treatment and recycling capability for electronic waste in the growing Sydney metropolitan market;
- Provide benefits to the community and environment through the encouragement of recycling, employment and cleaner production techniques;
- Be compatible with current and future land use in the St Marys Industrial Estate; and
- Align with Local, State and Commonwealth Government policies to improve and support Circular Economy outcomes.

The proposed development is also concluded to fully comply with all legislative, statutory and policy guidelines of NSW Government, NSW Environment Protection Authority (EPA) and Penrith City Council.

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1 INTRODUCTION

1.1 INTRODUCTION

This Statement of Environmental Effects (SEE) has been prepared by Wild Environment Pty. Ltd. to support the Change of Use (CoU) Development Application (DA) by Ace Recycling Group Pty Ltd (Ace Recycling) to Penrith City Council to accept and recycle electronic waste (e-waste) at 8 Kommer Place, St Marys, NSW 2760.

Ace Recycling is proposing to Change the Use at 8 Kommer Place, St Marys, from:

- the existing approved use for recycling of paper, cardboard and plastic material (DAs 11/0362 and DA 16/1240) to
- recycling of upto 5,900 tonnes per annum of e-waste and plastic recycling.

Less than 1,000 tonnes or 1,000 cubic metres of waste would be stored at any one time. No change is proposed for 7 Kommer Place (truck and vehicle parking).

Figure 1.1 shows the location of the site.

FIGURE 1.1: Site Location

1.2 BACKGROUND

Applicant:	Ace Recycling Group Pty Ltd c/ - Wild Environment Pty Ltd
Applicant Address:	2/18-20 Sturt St Smithfield NSW 2164
Subject Land:	8 Kommer Place, St Marys NSW 2760 (Lot 191/DP1135763)

Project: Change of Use to electronic waste and plastic recycling.

The site is paved with two main clear-span industrial units. Until March 2021 the site was used for cardboard, paper and plastics recycling, with parking within the site and on the adjoining 7 Kommer Place (Lot 20/DP1012357).

Based on information provided by Penrith City Council, the following relevant DA's were recorded:

DA	Site	Scope/Comment
03/3007	7 Kommer Pl.	• Parking of Trucks. Application and DA not sited.
11/0362	8 Kommer Pl.	• Factory/Warehouse Building & Packaging of Scrap Cardboard & Plastic Material Consent.
16/1240	7 & 8 Kommer Pl.	• Erection of a new awing with enclosed sides as an extension to the existing facility known as Building A. • Erection of new awnings adjacent to the western side boundary of the Site. • Formal layout of vehicle parking area on Lot 20 of DP1012357

A NSW EPA Environment Protection Licence (No 20640) was previously held for the site, permitting the recovery of general waste (plastic, paper and cardboard). The Licence was surrendered by the previous lessees in April 2021.

1.3 OUTLINE OF THE PROPOSAL

E-waste would be accepted from large suppliers (no public acceptance). Recycling activities would largely comprise acceptance and dismantling of whole e-waste units (TVs, computers, stereos etc) into their component parts, being plastics, printed circuit boards, glass, batteries and metal. These would be sorted (eg. metals would be sorted into ferrous and non-ferrous metals) and sent to downstream recyclers for further processing.

Ace Recycling also proposes to conduct value-add plastics recycling by processing the plastics from e-waste into added raw materials using automated equipment.

Processing would be carried out within existing buildings, with storage of segregated products stored within existing buildings and under existing external awnings. Unloading and load-out would be carried out on site.

Operations would be primarily from 8am to 4pm Monday to Friday, and would generate negligible noise or air emissions beyond the site boundary.

Approximately twenty (20) staff will be employed in total, including two management personnel. No off-site staff parking will be required, as there is ample parking is available on-site and 7 Kommer Place, including disabled and visitor parking, to comply with existing Consent and Council DCP requirements. Existing facilities would be used for office requirements and amenities. No changes to site utilities (gas, electricity, water, sewage) are required.

1.3.1 The Proponent

Ace Recycling is an established Australian company with a strong market presence as a major provider of e-waste recycling services under the National Television and Computer Recycling Scheme (NTCRS) stewardship program. Ace Recycling operates similar facilities in Smithfield, NSW, Victoria and Queensland, specialising in

the recycling of end-of-life e-waste products such as computers, printers, laptops, servers, mobile phones, and associated peripherals.

For further information on Ace Recycling's services refer to the web site www.ace recycling.net.au.

1.3.2 Need for Proposed Development

Rapid population growth in the Sydney metropolitan area, and the increasing popular domestic and commercial use of computer equipment, has resulted in a rapid increase in the volume of electronic waste requiring end-of-life collection and recycling. Governments, industry and the community are increasingly aware of the environmental impacts of waste and the need to divert from landfill and significantly increase the rates of sustainable and environmentally-responsible recycling of electronic waste. This particularly includes the well-established NTRCS, sponsored by Governments and business, which champions product-stewardship over the entire life-cycle of products. The proposed development would increase the treatment capacity in Sydney to safely and sustainably meet the changing waste market, and increase recycling for beneficial reuse.

Recycled products will be on-sold to specialist recyclers resulting in well-over 90% diversion from landfill.

1.3.3 Project Schedule

Subject to planning and other approvals, operations would commence immediately after securing the Change of Use planning consent and any related requirements.

1.4 OBJECTIVES OF THE DEVELOPMENT

The primary objective of the proposed development would be to provide greater and improved capability to treat and beneficially recycle e-waste for the growing New South Wales market and beyond.

1.5 ENVIRONMENTAL ASSESSMENT PROCESS

The proposed changes to the Facility will be assessed under Part 4 of the *Environmental Planning & Assessment (*EP&A*) Act, 1979*. Penrith City Council is the consent authority.

The premises are located within the St Marys/Dunheved Industrial Estate, and the site is zoned IN1 – General Industrial under Penrith Local Environmental Plan (LEP) 2010. The proposed development is consistent with the currently approved land use and zoning, and is permissible with consent.

The site and proposed development will be assessed with regard to Penrith Development Control Plan (DCP) 2014. Consistency with these planning instruments is detailed in Section 2 of this SEE Report.

The site has current planning consents for recycling of paper, cardboard and plastic material (DAs 11/0362 and DA 16/1240). Ace Recycling is seeking a Change of Use for recycling of up to 5,900 tonnes per annum of e-waste and plastic recycling.

No licence from the NSW Environment Protection Authority (EPA) is required because it is not proposed to:

- have on site at any time more than 1,000 tonnes or 1,000 cubic metres of waste, or

- process more than 6,000 tonnes of waste per year.

Assessment concludes that there are no actions that could have a significant impact on matters of National Environmental Significance, hence it is considered that there are no additional approvals required under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999.*

This SEE assesses the cumulative impacts of the existing site operations and the proposed changes, and all relevant policies and statutory instruments.

2 ASSESSMENT & APPROVAL PROCESS

2.1 PLANNING CONSENT FRAMEWORK

2.1.1 Environmental Planning and Assessment (EP&A) 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. Penrith City Council is the consent authority, and the application will be lodged through the NSW Planning Portal.

Section 4.15(1) of the EP&A Act, 1979 provides criteria which a consent authority is to take into consideration, where relevant, when considering a DA. An assessment of the subject DA, in accordance with the relevant matters prescribed under Section 4.15(1), is provided within this report. The proposed development does not require any integrated development approvals pursuant to Section 4.46 of the EP&A Act.

The site is zoned General Industrial (IN1). It is therefore also permissible, with consent, in accordance with Division 23 of the NSW State Environmental Planning Policy (Infrastructure SEPP 2007).

2.2 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.

2.2.1 Local Planning Instruments

2.2.1.1 Penrith Local Environment Plan (2010)

The land is zoned General Industrial Zone IN1 (Precinct 1) in accordance with Fairfield LEP 2010. The objectives of the zone and how the development meets those objectives are set out in **Table 2.1** below.

Table 2.1: Consistency with Objectives of LEP 2010, General Industrial Zone IN1

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 minimise any adverse effect of industry on other land uses	Previous operations and this assessed of 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.

To promote development that makes efficient use of industrial land.	Use of existing facilities, site, utilities and buildings for growing e-waste recycling
To permit facilities that serve the daily recreation and convenience needs of the people who work in the surrounding industrial area.	Approximately twenty jobs created. Ample off-site parking available, or public transport on Forrester Rd/Ropes Crossing Blvd.

The proposed changes to the existing facility are considered likely to comply with these definitions, and should therefore be permissible with consent.

The General Industrial Zone IN1 also prohibits hazardous and offensive industry. This assessment concludes that, with appropriate mitigation measures, there will be no adverse odour, noise or amenity impacts, and therefore that the proposal is not hazardous or offensive.

There are no LEP principal development standards (e.g. lot size, height, FSR etc.) controls relevant to the CoU DA as the envelope of the buildings and site will not be altered. The land has no heritage items located on or near it, is not within a potential acid sulphate soil area, riparian area, or bush fire risk area. Council has identified the Site as having a negligible risk of overland flood (inundation).

2.2.1.2 Penrith Development Control Plan 2014

Penrith Development Control Plan (DCP) 2014 provides guidelines and standards that must be considered for all new development. Objectives of the DCP and how the Change of Use complies are set out below in Table 2.2.

Table 2.2: Penrith Industrial DCP 2014 (Precinct 1) Objectives

Provision	**Consideration**
a) To promote industrial development which can operate in a functional, safe and environmentally friendly manner;	Change of Use proposal will use existing facilities, and be designed and operated to ensure functionality and safety to adjoining land uses.
b) To minimise conflict between industrial land uses and adjacent sensitive land uses;	As above.
c) To ensure that development of land to which this section applies will not significantly affect the function, efficiency and safety of all classified roads and other major roads;	Reduction in truck traffic from previous use. Kommer Place is not a major or classified road.
d) To promote development of a visually attractive form, design and scale, where urban elements, streetscape and built forms are integrated with the existing environment;	No change to existing site buildings or facilities: no change to urban form or streetscape.
e) To retain existing vegetation and promote the integration of significant landscaped areas into the site design to minimise the impacts of built form and	No change to existing (minimal) site vegetation.

hardstand areas;	
f) To manage traffic impacts and access issues for larger vehicles and loading facilities;	Dual-access for trucks off Kommer Place. No queuing on Kommer Place. All loading/unloading within site.
g) To address visual impacts and safety requirements of large external storage areas;	Storage within buildings or under awnings as approved. Not visible from streetscape or adjoining lands.
h) To promote employment generation that has considered access to public transport and supporting services for improved amenity.	Approximately twenty jobs created. Ample off-site parking available, or public transport on Forrester Rd/Ropes Crossing Blvd.

Penrith DCP Industrial zoning sets out a wide range of design and management guidelines, which are not applicable for a CoU application on an existing site with established facilities. However Section 4.5. (Storage of Materials and Chemicals) of the Industrial DCP requires that external storage of goods must be avoided if possible. It is noted that 8 Kommer Place has existing consent for external storage of processed goods, under purpose-built awnings (DA 16/1240).

Penrith Industrial DCP Section 4.5.4 (Storage of Materials and Chemicals) also sets out:

If the development involves the storage of chemicals on the site, a Chemical Use and Storage Report may be required (see Appendix F3 'Submission Requirements' for further details). A chemical use and storage report will not be required when:

a) The use of chemicals is for routine cleaning and the chemicals to be used are of household or hospital grade;

b) The total quantity of chemicals to be routinely used or stored on the site does not exceed 100 litres;

c) The chemicals to be used or stored are not of sufficient acidity, alkalinity or strength to cause significant harm on skin contact, or to the environment if a spill were to occur; and

d) The application outlines the methods proposed to be used to minimise the potential for spills.

The Ace Recycling CoU would:

- Only comprise use and storage of chemicals for routine cleaning and maintenance;
- Total quantity of chemicals would not exceed 100 litres;
- Would be stored in chemical cabinets and used in accordance with manufacturers instructions, in accordance with Safety Data Sheets
- Spill kits and resources would be provided to negate the risk of incidents, spills, harm or pollution.

Hence it is considered that the CoU complies with the requirements of the Industrial DCP, and a Chemical Use and Storage Report is not required.

2.2.2 State and Regional Plans

2.2.2.1 State Environmental Planning Policies

Consideration has also been given to relevant State Environmental Planning Policies (SEPPs) and Plans including:

- State Environmental Planning Policy (Infrastructure) 2007
- SEPP No. 33 – Hazardous and Offensive Development
- SEPP No. 55 – Remediation of Land
- NSW Waste Avoidance and Resource Recovery (WARR) Strategy 2014-21
- A Plan for Growing Sydney 2014

State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP)

Under the Infrastructure SEPP, Zone IN1 General Industrial is a prescribed zone in accordance with Clause 120. This clause identifies a resource recovery facility 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 Roads and Maritime Services (RMS).

It is however noted that the projected traffic volumes are light, and that Kommer Place is not a major or classified road.

SEPP No. 33 – Hazardous and Offensive Development

SEPP 33 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.

A preliminary 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 CoU was

assessed as follows:

- Maximum quantities of dangerous goods will not exceed the screening thresholds for any class of good (200kg of batteries)
- The processing and storage volumes will not exceed the threshold of the guidelines or the Protection of the Environment (Operations) Act and Regulations
- The development therefore does not fall within the definition of potentially hazardous industry.

Noise and air quality emissions would be negligible (based on regular audits by independent consultants on Ace Recycling's similar facilities elsewhere, as required by the NTCRS program), hence no adverse amenity impacts on adjoining landuses are anticipated.

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 SEE therefore concludes that the proposed changes would not exceed the screening test of SEPP 33 as potentially hazardous or offensive.

SEPP No. 55 – Remediation of Land

No civil or building works are proposed. No excavation is anticipated, but should this be required, any waste would be classified in accordance with NSW EPA Waste Classification Guidelines and disposed of to appropriately licenced facilities.

8 Kommer Place St Marys is not listed on the NSW EPA Contaminated Lands Register.

NSW Waste Avoidance and Resource Recovery (WARR) Strategy 2014-21: provides targets for the reduction in waste to 2021. The objectives and targets of the Strategy are to:

1) Avoid and reduce waste generation;

2) Increase recycling;

3) Divert more waste from landfill;

4) Manage problem wastes better;

5) Reduce littering;

6) Reduce illegal dumping.

The Strategy includes targets to increase recycling of municipal solid waste, and commercial and industrial waste to 70% by 2021-22. The proposed Facility will assist in meeting this target and is considered to be consistent with the NSW WARR Strategy.

A Plan for Growing Sydney 2014: Action 4.2, Identify and Protect Land for New Waste Management Facilities, identifies that Sydney will require additional waste and recycling infrastructure of:

- additional recycling infrastructure capacity of 165,000 tpa for municipal (local council) waste;
- additional recycling infrastructure capacity of 380,000 tpa for commercial and

industrial waste;

- an additional 25 community recycling centres for recycling of household hazardous waste.

The Plan sets out the need for the identification and protection of new locations for waste management infrastructure eg. the proposed Ace Recycling Facility in St Marys.

2.3 CONCLUSION

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

3 CONSULTATION

Ace Recycling embraces the principles of sustainable development, and actively seeks input and involvement from the wider community. Ace Recycling is 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.

3.1 CONSULTATION PROGRAM

Penrith City Council was consulted during the planning phase to search the history of the site planning consents, site issues (traffic, flood potential etc) and process for the CoU DA.

Immediate neighbours will be consulted in August 2021 by Ace Recycling regarding the proposed operations at the site, and general site management practices.

4 DESCRIPTION OF THE PROPOSAL

4.1 SITE LOCATION, LAND OWNERSHIP AND SURROUNDINGS

The site is located in the Dunheved/St Marys Industrial Estate. This industrial estate is located approximately 37km west of Sydney CBD, within an established industrial precinct, and well served by arterial roads.

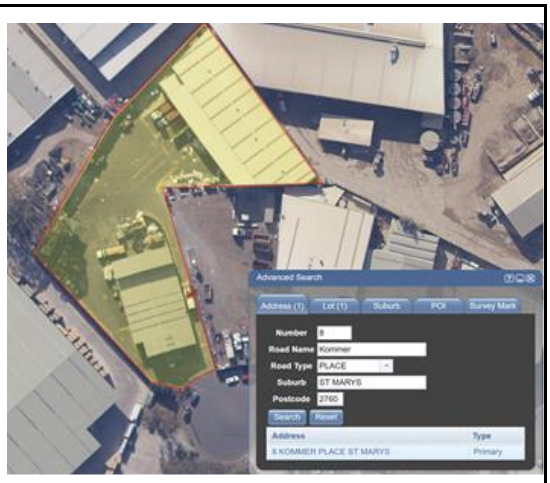
Ace Recycling has entered into a long term (5+5) lease for the properties, formerly occupied by Cardboard Kings/JRR, as follows:

Street Address	Lot/DP	Street Frontage/Area
7 Kommer Place St Marys	Lot 20/DP1012357	19m/2001 sqm
8 Kommer Place St Marys 2	Lot 191/DP1135763	13.8m/5649 sqm

The site at 8 Kommer Place is owned by Cardboard King Pty Ltd, and leased by Ace Recycling under a long-term lease.

Figure 4.1 below shows the location of the facility and the surrounding land uses.

7 Kommer Place, St Marys (primarily truck parking).



8 Kommer Place, St Marys (processing & storage).

Figure 4.1: Subject CoU site & adjoining leased property.

Access to the Dunheved/St Marys industrial area is excellent, with numerous arterial roads leading to the M4 and M7 Motorways. Dunheved/St Marys Industrial Estate provides wide carriageways and experiences constant traffic flows over extended operating periods.

Adjoining sites are of similar design and use, comprising a mix of light and heavy industries such as cabinet making, panel beating, and engine repair workshops.

The site is largely covered in hardstand with fencing provided along all perimeter boundaries. All services (electricity, gas, water, sewage) are already provided.

Dual access is provided from Kommer Place, hence all traffic will access and egress from separately driveways. An electronic weighbridge is installed on the egress

driveway.

There will be no change to the footprint, area or elevation of site buildings as a result of the proposal: no building works, alterations or additions are proposed.

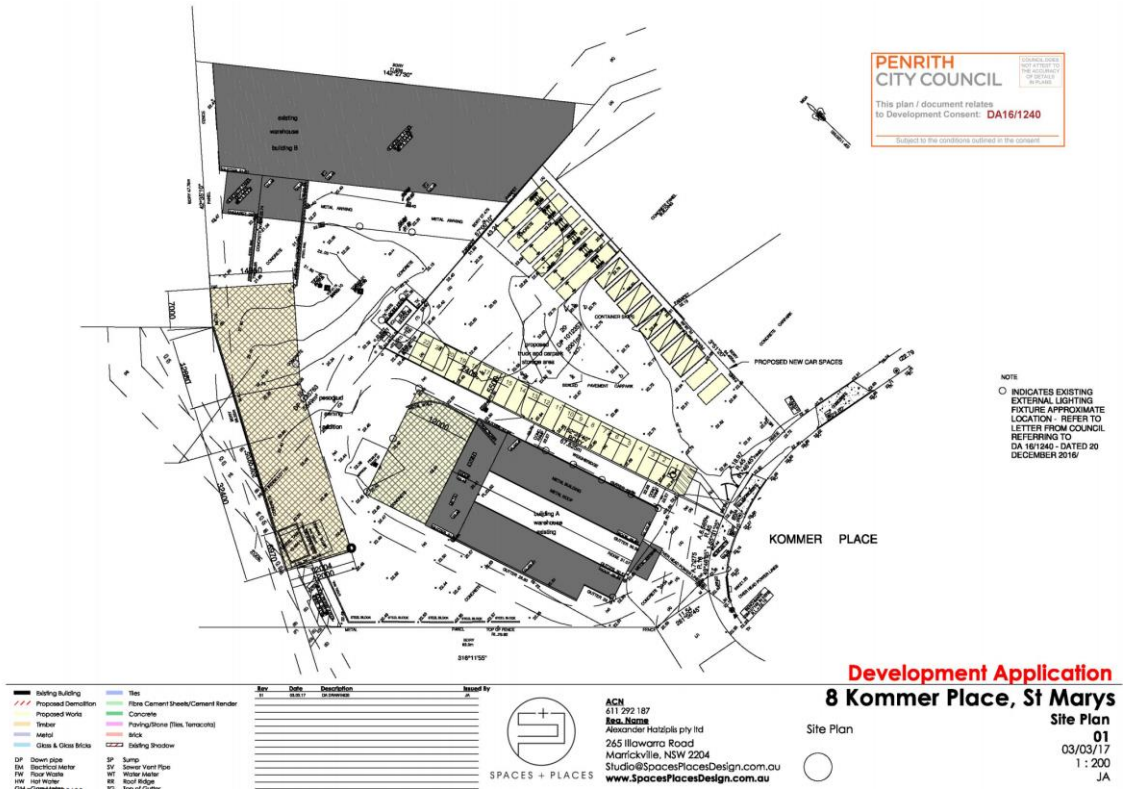


Figure 4.2: Site Plan (Existing)

4.2 DESCRIPTION OF EXISTING FACILITIES

The area of the site is approximately 5,649 sqm, with a 13.8 metre street frontage.

Access to the site is from the cul-de-sac at the end of Kommer Place via dual driveways. There is a wide grassed verge on the Kommer Place, with several established native street trees.

The existing buildings are well suited to manufacturing and industrial operations, with a floor area each of approximately 630 sqm. Buildings are of utilitarian design, with wide internal clearances, concrete slab floors, steel structures, galvanised steel rooves and concrete panel/sheet metal walls. Access is by roller doors from the main entrance off Kommer Place. The building floor slabs are designed to capture all spillages. Dust suppression sprinklers have been installed in the rooves and suitable fire protection is in place.

Office facilities in Building A comprise approximately 260 sqm, consisting of an adjacent ground-floor administration office, and a mezzanine office overlooking the operational area.

Vehicle parking consists of 26 spaces on the concrete aprons, which are suitable for both light and heavy vehicles.

4.3 PROPOSED FACILITIES AND PROCESSES

The proposed Change of Use scope is as follows:

- accept incoming electronic waste sourced from the NTCRS, businesses and local government;
- inspect and sort electronic waste into its respective sub-categories and quarantine any out-of-scope materials
- store unprocessed electronic waste
- primary dismantling of electronic waste into its major recyclable components
- store recovered recyclable components; and
- dispatch the recovered recyclable components to approved downstream vendors for further value-adding and/or disposal.

Mixed e-waste would be delivered to the site predominately in stillages and/or pallets. Goods will be inspected for out-of-scope waste, which will be separated and stored for same-day removal from site. The remaining e-waste is kept in the storage area awaiting the next step.

The core processing recycling methodology utilised for the proposed facility will be the manual dismantling of the electronic waste into its major recyclable components, using a labour workforce.

As a primary stage processor, electronic waste will be dismantled into its major recyclable components and sent to third party facilities for further downstream recovery. Mixed e-waste is sorted and weighed into its major categories for further processing.

E-waste is processed on the manual dismantling benches. Manual dismantling is the preferred method as it results in increased resource recovery and minimises landfilling. E-waste is stripped of all the major recyclable components comprising of:

- Plastics
- Printed circuit boards and CPUs

- Sub-components eg hard-drives, fans, power boxes
- Ferrous
- Non-ferrous
- CRT Tubes
- Batteries; and
- LCD panels

Batteries will be protected from short-circuiting using tape and will be placed in a designated dangerous goods area for batteries.

LCD panels will be stripped, with the small mercury backlight tubes to be removed within a purpose-built anti-pollution and vapour capture downdraft table. The table will be kept under negative pressure to remove any fine particulates in the event that a tube is unintentionally broken during the dismantling process.

All other recyclable components will be stored in designed bulk bags or boxes. Once shippable quantities are generated, they will be loaded into containers and sent to the approved downstream vendors for further value adding or disposal.

ACE proposes to install plastics sorting plant at the facility which will sort and segregate the plastic streams from the e-waste dismantling process. Plastic by-product streams include ABS (acrylonitrile-butadiene-styrene), PE (polyethylene), PS (polystyrene), HIPS (high impact polystyrene). These sorted outputs would be sent to downstream recyclers for use as raw materials in the production of new goods, hence contributing to the objectives of the Circular Economy as well as value adding to the original waste plastics product.

ACE Recycling's processing practices are compliant with AS/NZS5377: 2013 – "Collection, storage, transport and treatment of end-of-life electrical and electronic equipment" standard which is mandatory for all recyclers recycling under the Federal government's NTCRS. Ace Recycling also has ISO 9001:2015 (Quality Management), and ISO 14001: 2015 and AS/NZS 4801:2001-series environmental management accreditations.

4.3.1 Transport and Hours of Operation

Unloading and load-out would be carried out within the site, with storage of segregated products stored within buildings or under existing external awnings. All processing and sorting will be carried out within existing buildings.

Operations would be primarily from 8am to 4pm Monday to Friday, and would generate negligible (if any) noise or air emissions beyond the site boundary. No work would be carried out on Saturdays, Sundays or public holidays.

Approximately twenty (20) staff will be employed in total, including two management personnel. No off-site staff parking will be required, as there is ample parking available on-site and 7 Kommer Place, including disabled and visitor parking, to comply with existing Consent and Council DCP requirements. Both 7 & 8 Kommer Place have existing consents for truck and car parking: line marking and signage for both sites will be reinstated where required, including for one accessible car space, in accordance with AS2890.6 requirements. Existing facilities would be used for office requirements and amenities.

IN1 Zoning allows for operation 24 hours a day with approval (with consent).

4.3.2 Costs, Funding and Staging

There is no projected capital cost for the proposed changes. Works would commence following Council consent.

4.4 AUXILLIARY FACILITIES

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

Stormwater will continue to be kept separate from process water and prevented from entering the sewer. All stormwater pits on the site are fitted with strainers.

All operational areas are within bunded areas with sumps. Discharge to Sydney Water's existing sewer, in compliance with trade waste agreement standards, will continue. The existing emergency and fire systems will be upgraded as required for the proposed change, with compliance certificates provided with the audits.

5 EXISTING ENVIRONMENT AND IMPACT ASSESSMENT

5.1 LAND USE AND ENVIRONMENTAL SETTING

5.1.1 Site Analysis

The Site is surrounded by extensive light and heavy industry with immediate neighbours as follows:

- North – light industrial (equipment/cabinet manufacture and engine repairs)
- East – mixed transport, manufacturing storage and other businesses
- South – light and heavy industry
- West – light industrial (equipment/cabinet manufacture and engine repairs)

The nearest residential area is approximately 1.1 km away.

Access to 8 Kommer Place is at the end of a cul-de-sac that is not subject to through-traffic, with only occasional traffic from adjoining landuses. There is negligible (if any) retail or pedestrian traffic in Kommer place.

5.1.2 Construction impacts

No temporary or long-term construction impacts are anticipated as the proposal comprises only a Change of Use.

5.1.3 Operational impacts

Potential impacts on surrounding land uses will be negligible but may result from the acceptance of waste and general amenity impacts such as traffic and noise.

As the proposed development changes will be undertaken within an established industrial estate, and based on the mitigation measures proposed, adverse impacts on the surrounding land uses are not anticipated.

5.2 WATER QUALITY, DRAINAGE AND SOILS

5.2.1 Existing Environment

The Site is located in the South Creek catchment. All driveways and working areas on the site are fully sealed. Surface water runoff from the driveways, parking area and roof are directed to the Council stormwater system.

All stormwater is directed to onsite sumps prior to discharge. Sumps are inspected and managed to ensure the site discharge is not contaminated. All stormwater drains on site are fitted with strainers to remove larger waste that may have been dropped on site.

Areas receiving and storing waste are fully bunded. Waste is received and stored in bins or stillages or pallets.

As described above, all works will take place within a sealed bunded area. No excavation or other disturbance of the underlying soils is required.

5.2.2 Operation impacts

Operational impacts from the acceptance and storage of e-waste waste are considered to be negligible. All handling and transfer of waste will take place within a bunded, impermeable area.

There will be no change to the stormwater drainage system.

5.3 BIODIVERSITY

5.3.1 Existing flora and fauna

The site has been heavily modified by industrial use. Few trees or shrubs are present, and the majority of the site is hardstand. There are several hardy eucalypts (Sydney bluegum) and callistemon (bottlebrush) on the road verge and within the perimeter of the site which will be protected and maintained. There is limited flora and fauna resources on the site and its immediate surroundings, with very little potential habitat.

5.3.2 Impact Assessment

There are anticipated to be impacts from accepting and processing e-waste during the operational phase.

5.4 AIR QUALITY (DUST & ODOUR)

5.4.1 Existing air quality

Air quality in the locality is typical of industrial areas, with general amenity impacts associated with heavy traffic and industry.

5.4.2 Impact Assessment

No adverse air quality impacts are anticipated from the receival, storage and treatment and load out of e-waste waste.

5.4.3 Mitigation measures

- Design and stringent housekeeping regime, subject to inspection and audit;
- Waste transferred regularly to reduce volumes;
- Vector/pest control program to be implemented.
- Good neighbour program, monitoring and contact management program to be implemented.

5.5 NOISE & VIBRATION

5.5.1 Existing Acoustic Environment

The Dunheved/St Marys Park Industrial Estate hosts a range of heavy industries that operate 24 hours a day. The Ace Recycling Site is similarly able to operate 24 hours a day, subject to Consent. In addition, transport of goods and materials would be scheduled outside normal working hours where possible to avoid congestion.

Background noise in the area is associated with traffic, including a high portion of heavy vehicle movements, and surrounding industrial operations.

5.5.2 Noise Impact Assessment

Based on similar operations, the noise generated by truck traffic, and unloading and loading e-waste is not considered likely to impact on neighbouring land users.

Operational noise is not considered likely to have any significant impact on adjoining businesses or residential areas as the proposal does not include the installation or operation of any significant noise generating plant or equipment.

5.5.3 Conclusion

It is therefore concluded that the acceptance and recycling of e-waste would not have a significant noise impact on adjoining neighbours or the nearest residences.

5.6 TRAFFIC, ACCESS & PARKING

5.6.1 Existing traffic and road network

5.6.1.1 Traffic and Access

The main purpose of the Dunheved/St Marys Industrial Precinct is to concentrate heavy vehicle movements and deliver them to an appropriate intersection within the regional road network. The location of the site is well serviced by a number of arterial roads including Links Road, Forrester Road, Christie St, and Ropes Crossing Boulevard.

Streets within the Industrial Estate have been designed specifically to cater for the movement of heavy vehicles within an industrial area. As such, they provide wide carriageways with lay-bys and turning areas sufficient for vehicles to enter all adjacent sites. Kommer Place is a relatively quiet cul-der-sac within the Precinct, although traffic operates over extended periods.

5.6.1.2 Parking

Parking on 8 Kommer Place is approved for twenty-six cars, which exceeds requirements for the existing manufacturing, administration and proposed changes. Floor space of the site will not be altered by the proposal.

Truck parking is provided on 7 Kommer Place, and far exceeds Ace Recycling's requirements.

5.6.2 Impact Assessment

As 8 Kommer Place is at the end of a cul-de-sac with a large turning circle, the proposed Change of Use is not likely to have a material impact on traffic flows on- and off-site. Ample parking exists on site, and maneoveribility is excellent. No queuing will result on public roads or on Kommer Place.

There will be no impact on any residential streets as a result of the proposal.

5.7 HERITAGE

5.7.1 Existing setting

A search of the relevant registers and visual inspection of the site indicates that there are no registered heritage items of conservation value.

A search of the NSW Office of Environment and Heritage AHIMS (Aboriginal Heritage Information Management System register indicated that there were no registered sites or relics on, or in the immediate vicinity of, the property.

5.7.2 Impact assessment

The operational phase of accepting e-waste would have no impact on heritage items or places in the vicinity as:

- the site has been highly modified by past use;
- the proposed works do not entail excavation or disturbing the ground surface

of the site;

- the proposed Change of Use entail development of an existing building or structure that does not change the current building footprint;
- A recent AHIMS search indicated that there were no registered relics or sites in the vicinity of the property.

Therefore, it is considered unlikely that any items heritage items would be impacted.

5.8 VISUAL AMENITY, SOCIAL AND COMMUNITY ASSESSMENT

5.8.1 Existing scenic condition and local character

The Dunheved/St Marys Park Industrial Estate is characterised by industrial buildings and associated structures ranging from processing and manufacturing plants, wholesale, transport and service firms. 8 Kommer Place consists of paved parking and driveway areas and large utilitarian buildings with associated office and meeting room areas.

The Facility has street frontage to Kommer Place, consisting of the wide driveways and verges with little vegetation.

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

The site at 8 Kommer Place is located within an industrial precinct away from residential zones: he nearest residential areas are located across approximately 1.1 km west and have no direct view of the site.

5.8.2 Impact Assessment

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

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

5.9 PUBLIC HEALTH & SAFETY

5.9.1 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 of e-waste to the Site at 8 Kommer Place will not pose any potential issue for public health and safety.

5.9.2 Overview of Potential Public Health Risks Associated with e-waste

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

Operational Risks

- unloading, handling and storage on site;
- airborne emissions from waste handling – odour and dust;
- stormwater management;
- wastewater management;

- control of vermin and insect pests;
- security.

Experience operating with e-waste at other facilities, such as existing plants in Smithfield and Brisbane and Melbourne, 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 5.1: 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	▪ E-wastes transported in enclosed containers and well-secured ▪ Training in appropriate procedures provided to operators and truck drivers, including emergency response
Unloading, handling and storage on site	Dust, vermin	Inhalation and physical contact with dust. Secondary impacts through pathogen-spreading vectors such as insects and vermin	▪ Products transferred as whole units as soon as possible (generally 24-hour residence time) ▪ Unloading within site, and storage areas which are well ventilated, 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 ▪ wastes to be kept separate from other waste types
Stormwater management	Contamination	Physical contact	▪ Prevention of stormwater entering process and handling areas through use of roofs and bunds. ▪ Stringent housekeeping systems
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 in containers, 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 vector and pest program e.g. use of rodent traps at appropriate locations in storage areas, regular inspections and audits. ▪ 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

Vector control will be paramount to the proposal, and will include:

- Training of all staff in correct handling, use of appropriate PPE, and control of vectors;
- Use of professional pest control contractors and systems as appropriate (e.g. Rentokill or similar) to eliminate insects and rodents etc;
- Rigorous monitoring and auditing of the effectiveness of the above controls;
- Inspections and learnings from many other waste treatment facilities.

Potential public health implications for the proposed development are further reduced by the position of the Facility within an industrial precinct, well away from the nearest residential area. The material would be delivered in enclosed pallets/containers.

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.

5.9.3 Conclusion

The results of this preliminary health impact assessment indicate that public and occupational health and safety risks associated with the proposed Change of Use will be negligible if the safeguards outlined above are implemented. As well as complying with stringent OHS guidelines, Ace Recycling has an established Occupational Health and Safety Management System, certified to AS 4801 (and an Environmental Management System in accordance with ISO-14001). Ace Recycling 's Environment, Quality and Safety Department are responsible for the maintenance and auditing of these systems with the facility operation and maintenance teams.

5.10 WASTE, ENERGY & RESOURCES

5.10.1 Energy Use

Minimal energy use required for proposed operations. Site has more than adequate capacity.

5.10.2 Waste Generation

Ace Recycling has a comprehensive waste management system in place with transport off-site by a commercial provider. The proposed changes will not substantially alter the waste types and recovery processes.

The proposed changes to the Facility are an important component of sustainable waste management through resource recovery.

5.10.3 Impact Assessment

The acceptance and treatment of e-waste would see additional wastes diverted from landfill to be beneficially reused.

5.10.4 Mitigation Measures

- Records shall be maintained of each load of waste entering the premises, including the identification of the vehicle, weight, nature and origin of waste received, and how it was contained
- Waste transporters will continue to undergo an induction process and attend continuing information courses on waste types permitted to be received
- Any wastes generated on the site will be recycled to the maximum extent possible

(a minimum of 90% recycling is required under NTCRS rules). Refer also to Waste Management Plan (Appendix B).

5.11 ECONOMIC & FINANCIAL ASSESSMENT

5.11.1 Existing environment

The Facility is located in the Dunheved/St Marys Park Industrial Estate which is one of Sydney's significant industrial hubs and an important economic and employment centre within the City of Fairfield. The site is strategically located between growth areas and major populations. The area has a wide range of productive industries and supporting services.

One of the key objectives of Penrith DCP (2014) is to encourage and reinforce recycling and waste management principles. The proposed development meets both these principles by allowing Ace Recycling to stay economically competitive, meeting the needs of a changing waste market, offering employment, while providing a service that is central to waste management and recycling policies.

5.11.1.1 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 development will have the following benefits:

- Reduction in environmental risks associated with landfill disposal and ultimately to groundwater and the environment;
- Recycling benefit to the wider Sydney metropolitan area via commercial and industrial clients and production of useful by-products for beneficial reuse.

Consistent with the objectives of Penrith LEP (2010) and Penrith DCP (2014), the proposed development will complement the existing industries in the St Marys Industrial Estate.

5.12 CUMULATIVE IMPACTS

Amenity impacts are considered likely to be negligible with the proposed controls, facility design, operational scheduling, and implementation of Ace Recycling's environmental management system. The facility will continue to be supervised continuously, independently audited regularly under the NTCRS rules, and subject to an extensive range of monitoring procedures. Incident management and emergency response procedures will be implemented. Ace Recycling has a proud environmental and "good neighbour" record, and its Australian operations are in general accordance with ISO-14001 Environmental Management Systems.

Identification of hazards associated with the proposed developments to the Ace Recycling facility will be reflected in an updated EMS.

Further, public health and safety, and the occupational amenity of neighbouring land uses, are not likely to be impacted by vectors due to extensive and rigorous controls.

No substantial cumulative impacts have been identified for the proposed changes.

The proposed changes to the existing facility will not result in any material change to traffic flows. Water quality changes are also considered negligible.

By providing a capability to safely accept, transfer and recycle/beneficially reuse e-waste, it is considered that the risk of poor management and disposal practices (i.e. disposal to landfill and the environment) will be minimised, along with the reduction in

total cost to customers, while resulting in improved waste management for the local community and the broader city of Sydney.

6 ENVIRONMENTAL AND OPERATIONAL MANAGEMENT SYSTEMS AND PLANS

6.1 MANAGEMENT SYSTEMS

Ace Recycling's existing environmental and occupational health and safety management systems keep abreast of legislative changes, governmental regulations and changes to market conditions. Risk prevention remains a priority, with an internal audit system used to check the reliability of the facilities.

Ace Recycling has been established for over eight years, and is proud of its record as being a good neighbour and promoting environmentally sustainable development. Ace Recycling's environmental management system is in general accordance with ISO-14000 and ISO-9000 Series requirements. Ace Recycling also has AS-4801 accreditation for their occupational health and safety system.

This section describes the environmental and operational management systems and plans for the Ace Recycling e-waste recycling facility, including the outline environmental management plan (EMP) operation of the proposed development; training, monitoring, auditing and reporting requirements; outline plans for incident management; and a summary of mitigation measures during all phases of the proposed development.

6.2 ENVIRONMENTAL MANAGEMENT PLANS

6.2.1 Operational environmental management

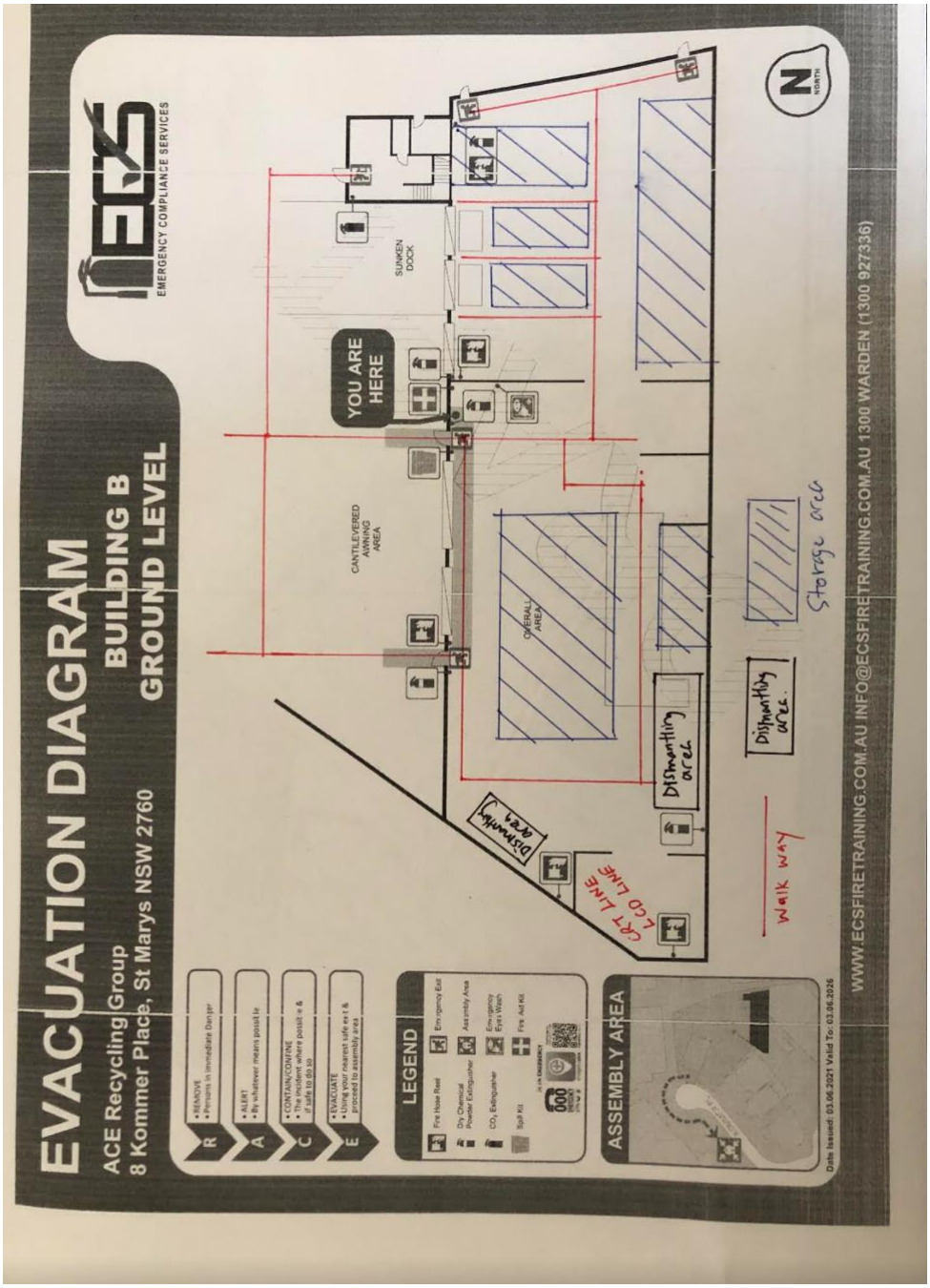
Ace Recycling will update the EMS, where required, to include additional operational safeguards for the acceptance of e- waste streams at 8 Kommer Place. In particular the operational management will address health, safety and environmental issues associated with acceptance of e-waste. All environmental management operational procedures will be in general accordance with ISO-14001 and AS4801.

Operational management will outline safety training requirements for employees and detail precautionary measures to be undertaken when working in hazardous conditions.

The EMS will be reviewed annually and will incorporate the result of any monitoring undertaken in the previous year.

6.3 INCIDENT MANAGEMENT PLAN

The incident management plan will be updated to include specific actions that may relate to handling and transfer of e- waste. The Fire Safety Schedule will be updated (including evacuation plan; refer Appendix A). Liaison with NSW Fire and Rescue (local Brigade) will be carried out during detailed design to confirm and document first-response and emergency management requirements.



Appendix A: Evacuation Diagram. To be updated as part of Fire Safety Audit.

Appendix B: Waste Management Plan

Ace Recycling

8 Kommer Place, St Marys

Purpose and Scope

This Waste Management Plan (WMP) sets out how Ace Recycling will reduce and manage waste during the operation of the electronic waste facility at 8 Kommer Place St Marys NSW 2760.

A key objective of this WMP is to ensure appropriate environmental controls and procedures are implemented during all activities to avoid or minimise potential adverse environmental impacts associated with waste generation, handling or disposal. To achieve this objective, Ace Recycling will adopt the waste management hierarchy specified within the NSW *Waste Avoidance and Resource Recovery (WARR) Strategy 2014-2021.*

Waste Management and Reuse

Waste management and reuse procedures for the Facility were developed in accordance with the waste hierarchy principles. Following is a detailed process for avoiding, reducing, reusing, recycling and disposing of waste.

As the Change of Use requires no building works, alterations or additions, no waste will be generated.

Waste Management Hierarchy

The Waste Management Hierarchy describes an approach to waste management to ensure the most efficient use of resources, to reduce environmental harm, and to provide for the continual reduction in waste generation.

The following hierarchy for managing waste, from the most desirable to the least desirable includes:

- Avoidance of unnecessary resource consumption;
- Resource recovery (including reuse, reprocessing, recycling and energy recovery); and
- Disposal.

The hierarchy is consistent with the policy objectives of the NSW Environment Protection Authority (EPA) and Penrith City Council's in achieving a reduction in waste generation and turning waste into recoverable resources. The *NSW WARR Strategy* provides a framework for reducing waste and making better use of our resources, in line with the principles of ecologically sustainable development. With their dual focus on protection and conservation, reprocessing and resource recovering are targeted as means of reducing potential hazards to the environment and capturing value from materials that would otherwise be disposed of to landfill, sewer and the broader environment.

Waste Classification

The classification of wastes generated from the operation of the proposed facility will be carried out in accordance with:

- Recovered oil spills/rags etc: NSW EPA *Waste Classification Guidelines*
- Treated water to sewer: Sydney Water Trade Waste Agreement

Reuse and Recycling Action Plan

Waste separation and segregation will be promoted on site to facilitate reuse and recycling as a priority of the waste management program as follows:

- Waste segregation – all waste materials will be separated on site into dedicated bins / areas where practicable, for either reuse or collection by a waste contractor and transported to off-site facilities. This will include appropriate waste receptacles within the office building as well as the maintenance shed.
- Plastics, metals and e-waste will be sorted and segregated to enhance resale/reuse potential.

Waste Disposal

Any wastes that are required to be transported to a landfill for disposal will be undertaken in accordance with the *NSW WARR Strategy* and the *NSW Protection of the Environment (Operations) Act 1997*. Wastes that are unable to be reused or recycled will be disposed of to an appropriately licensed waste management facility.

Waste Reduction Plan & Mitigation Measures

To ensure the environmental impact of the proposed development is minimised, environmental control measures will be implemented. The Site Manager will be responsible for overseeing the management of these control measures, however the responsibility for protecting the environment will be taken on by all staff. All recyclable stream to be directed to the highest possible use.

The mitigation measures that will be put in place are outlined in the table below. In addition, waste recording forms will be used as shown below.

Waste Management Plan during Operation

Mitigation Measure	**Responsibility**	**Timing**
Purchasing contracts will consider waste minimisation as part of site contract finalisation	Project Managers	Ongoing
Receptacles for collecting recyclable materials will be made available within the office space	Administration Manager	Ongoing
Any wastes generated within office areas will be recycled wherever possible including: • Waste paper and cardboard • Recyclable plastics / bottles / etc • Mixed food waste / garbage • Printer cartridges / batteries etc	All staff	Where possible Ongoing
Any wastes generated within e-waste dismantling areas will be recycled wherever possible. Plastics will be sorted and segregated.	Operations Manager	Ongoing
Appropriate receptacles for collecting waste oils, fluids, oily rags etc will be made available to ensure wastes are collected and disposed appropriately	Operations Manager	Ongoing
Any wastes generated unable to be recycled will be disposed in accordance with EPA waste management guidelines.	Operations Manager	Ongoing