

STATEMENT OF ENVIRONMENTAL EFFECTS

SUBJECT PREMISES:	Lot 1 DP 735733 (No. 2152) Castlereagh Road, Penrith	
PROPOSAL:	Building Additions – A new change room leading to the Seed Lab	
For:	"VIRBAC (Australia) Pty Ltd"	
PHONE:	Amit Patel New Projects Manager	
	(02) 4725 4596	
COUNCIL:	Penrith City Council	
DATE:	22 August 2014	

THE SITE:

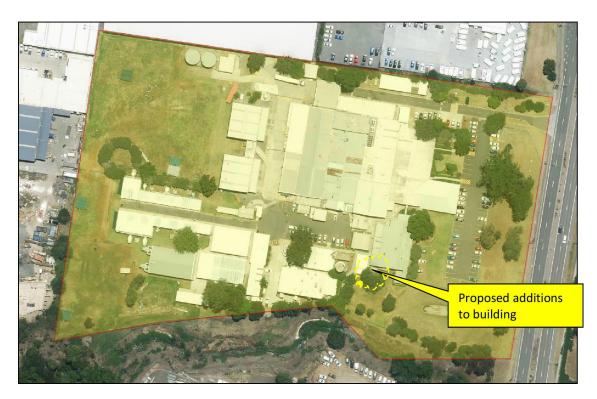
The subject premises (Lot 1) is an existing production facility located at No. 2152 Castlereagh Road, Penrith. This building is currently being used as a "production facility" and is located on the western side of Castlereagh Road in an existing commercial industrial precinct.

Lot 1 DP735733 has an area of approximately 4.048 Hectares. The original building was constructed between 1960 and 1970. The Penrith operation was then purchased from Elli Lily in 1986, at a time when the Webster's bacterial operation had reached a stage in its growth that required significant upgrading of facilities to a standard of quality that allowed continued vaccine manufacture under changing government regulations. The existing building at that time was used for the manufacture of gelatine capsules for human pharmaceutical products.

A new detached building at the south western corner of the site was then completed during 1986-1987. Operations were officially opened in April 1987. At the time, the Penrith operation was the leading veterinary vaccine plant in the southern hemisphere. The feature of the plant was the fully separated and controlled air systems between containment and clean room operations. Other additions to the property have been completed in 1997, 1998-2000, 2000-2002 and 2013 to the west and south of the main building.

The Castlereagh Road precinct is an industrial area with varying land uses being present. These include such premises as car sales and repair facilities, hardware stores, warehouse and storage and the like.

An aerial view of the location of the development is provided below, while photographs of the site and premises are provided in Appendix A.



Above – Aerial view of the Virbac property and premises location.

PROPOSED DEVELOPMENT:

The proposal seeks to undertake the construction of a new single storey addition to the existing 'seed lab' section of the building. The building additions will be undertaken at the south eastern part of the building. The objective is provide a new change room with airlock chamber leading into the laboratory. This is a result of an operational requirement to provide a separate change room in the entry path to the lab.

The building works will not encroach beyond the existing development footprint. The building addition will be outside the existing laboratory building. When viewed from a distance and from above the final completed works will be inconspicuous.

Building works:

Appendix B provides for the current and proposed floor plans at the premises.

The building materials will be constructed out of a concrete slab floor, steel framework, steel framed platform and metal cladding and roof matching the existing building. The existing fire safety measures in the building will be extended to the new building works. In this regard, all works will be fully compliant with the requirements of the Building Code of Australia including the provision of fire safety measures and egress as required. All structural elements will be designed by a registered structural engineer.

This Statement of Environmental Effects will address the proposed development against the provisions of the Environmental Planning and Assessment Act (Section 79(c)).

HEADS OF CONSIDERATION:

The following heads of consideration under section 79(c) of the Environmental Planning and Assessment Act, 1979 apply:

a) "the provisions of any environmental planning instrument"

Relevant EPI Use: Zoning: Penrith Local Environmental Plan 2010 Change room associated with the existing facility Zone IN1 – General Industrial

Zone Objectives:

Zone IN1 General Industrial

1 Objectives of zone

- To provide a wide range of industrial and warehouse land uses.
- To encourage employment opportunities.
- To minimise any adverse effect of industry on other land uses.
- To support and protect industrial land for industrial uses.
- To promote development that makes efficient use of industrial land.
- To permit facilities that service the daily recreation and convenience needs of persons working in industrial areas.

2 Permitted without consent

Roads

3 Permitted with consent

Animal boarding or training establishments; Car parks; Depots; Environmental facilities; Environmental protection works; Flood mitigation works; Freight transport facilities; General industries; Hardware and building supplies; Industrial retail outlets; Industrial training facilities; Industries; Landscaping material supplies; Light industries; Neighbourhood shops; Plant nurseries; Recreation areas; Sawmill or log processing works; Self-storage units; Signage; Take away food and drink premises; Timber yards; Transport depots; Truck depots; Vehicle body repair workshops; Vehicle repair stations; Warehouse or distribution centres.

4 Prohibited

Hazardous industries; Offensive industries; any other development not specified in item 2 or 3.

Penrith LEP 2010 explains the objectives of the IN1 – General Industrial zone. These objectives and comments on how the development compares with these objectives are provided as follows:

• To provide a wide range of light industrial, warehouse and related land uses.

<u>Comment</u>: The proposed development is a use permitted with consent within the zone. The objective is therefore satisfied.

• To encourage employment opportunities.

<u>Comment</u>: The current use of the site is approved and supports the surrounding land uses and is an appropriate use of the site. Staff employment with the use of the site has already occurred. There is no increased employment opportunity as no additional staff will be required. The objective is therefore considered to be satisfied.

• To minimise any adverse effect of industry on other land uses.

<u>Comment</u>: The proposed development is a low impact use that will have a very minimal impact on surrounding land uses on the site. The objective is therefore considered to be satisfied.

• To support and protect industrial land for industrial uses.

<u>Comment</u>: The use of the site is a permitted use within the zone which will protect and support the surrounding industrial land uses. The objective is therefore considered to be satisfied.

• To promote development that makes efficient use of industrial land.

<u>Comment</u>: The existing use of the site meets is a valuable resource for associated industries and is an integral part of surrounding business which is economically beneficial to local businesses. The facility has provided continued business to the local area for some time. The objective is therefore considered to be satisfied.

• To permit facilities that service the daily recreation and convenience needs of persons working in industrial areas.

<u>Comment</u>: The use of the existing building provides facilities to meet the recreation and convenience needs to working in the industrial areas. The premises is very close to the existing facilities in the Penrith area being minutes to the CBD and other retail and office facilities.

The overall objectives of *Penrith LEP 2010*, while broad and relating to the whole of the City, are also considered to be satisfied.

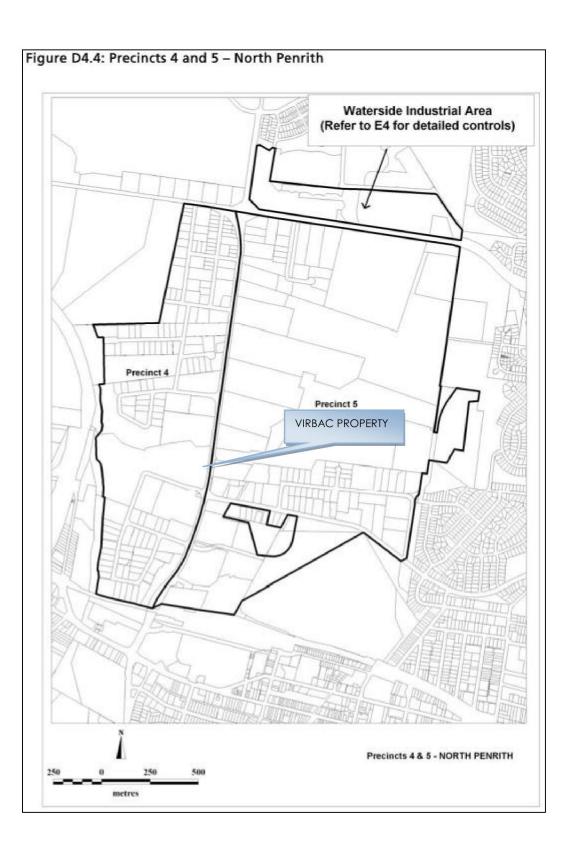
b) "the provisions of any draft environmental planning instruments"

There are no relevant draft environmental planning instruments applying to the site.

c) "any development control plan"

Penrith Development Control Plan 2010:

The following provisions under *Penrith Development Control Plan 2010* apply to the proposed development proposal.



D4 - INDUSTRIAL DEVELOPMENT				
DCP 2010 Section	OBJECTIVES & PERFORMANCE REQUIREMENTS	Comments		
4.1 Key Precincts	The site is within Precinct 4: North Penrith (west of Castlereagh Road) as identified in Figure D4.4.	Refer to Figure D4.4.		
4.2 Building Height	a. For Precincts 4 & 8 (areas adjacent to the Nepean River), the development must not be visually obtrusive when viewed from the Nepean River and must not adversely affect the scenic quality of the river.	The provisions of this section of the DCP do not apply to the site as the proposed works are not visible from the Nepean River. Therefore, the proposed works will not affect the scenic quality of the river.		
4.3 Building Setbacks and Landscaping	 Setbacks for industrial development are to be in accordance with the standards specified in Table D4.1: Lots fronting Castlereagh Road shall have a minimum building setback of 20m. These setbacks are to be landscaped, but may incorporate an off-street parking area if it can be demonstrated that the location of the car parking area: Is within a setback which is at least 13m wide and set behind a landscaped area which is at least 4m wide; promotes the function and operation of the development; Enhances the overall design of the development by implementing design elements, including landscaping, that will screen the parking area and is complementary to the development; and Does not detract from the streetscape values of the locality as illustrated in Figure D4.13 	The location of the proposed works wil not impact the existing setbacks as i will be located within the building envelop between the carpark at the rear and the existing main building.		

DCP 2010 SECTION	OBJECTIVES &	
	PERFORMANCE REQUIREMENTS	COMMENTS
4.4 Building Design	a. Non-residential developments including mixed use developments, with a construction cost of \$1,000,000 or more are to demonstrate a commitment to achieving no less than 4 stars under Green Star or 4.5 stars under the Australian Building Greenhouse Rating System (now part of the NABERS).	The proposed additions are not valued at over \$1,000,000, therefore a Green Star Rating / Australian Building Greenhouse Rating is not required. The proposed works have been designed to present a building form of significant architectural and design merit, even though it will not be visible from the street frontage or from a public reserve.
	b. Developments on land identified in Section 4.2 of this Chapter under 'Controls' shall be designed to:	
	 Present high standard of urban form incorporating innovative and attractive architectural design of all elevations and roof form; and 	
	ii) Appropriately reflect the important gateway entry roles of these precincts and the visually important access routes to the City.	
	Prominent elevations, such as those with a frontage to the street or public reserves or those that are visible from public areas, must present a building form of significant architectural and design merit. The construction of large, blank wall surfaces is not permitted.	
	Large Elevations should be articulated by structural variations and/or a blend of external finishes.	
	f. Particular care should be taken in regard to:	
	 i) Designing roof elements; and ii) Locating plant and mechanical equipment including exhausts, so as screen them from a public place. 	

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4.5 Storage of Materials and Chemicals	External storage areas must be located behind the building setback to minimise visual impact.	The main purpose of the building addition is to provide for a new change room connected to the existing seed laboratory.
	Rainwater tanks are not to be visually intrusive from the main street frontage or other public areas.	There are no new rainwater tanks or structures for chemical storage involved in the proposed development.
	d. If the development involves the storage of chemicals on the site, a Chemical Use and Storage Report may be required. A Chemical Use and Storage Report will not be required when:	
	 i) The use of chemicals is for routine cleaning and the chemicals to be used are of household or hospital grade; ii) The total quality of chemicals to be routinely used or stored on the site does not exceed 100 litres; iii) The chemicals to be used or stored are not of sufficient acidity, alkalinity or strength to cause significant harm on skin contact, or the environment if a spill were to occur; and iv) The application outlines the methods proposed to be used to minimise the potential for spills. 	

4.6 Accessing and Servicing the Site	 a. New industrial developments with direct access onto Castlereagh Road will need to provide a deceleration lane in accordance with the Roads and Traffic Authority Guidelines. b. Development on newly created allotments that front Castlereagh Road shall ensure that: i) The allotment of land was created in accordance with a subdivision 	The development does not include the provision of new carparking or driveways. The existing car parking and driveways are to be retained.
	 with a subdivision approved pursuant to this DCP; and ii) Access to the allotment is in accordance with the access arrangements approved with the subdivision. 	
	d. Industrial development shall, where appropriate, be designed to:	
	 i) Allow all vehicles to enter and leave the site in a forward direction; ii) Accommodate heavy vehicle parking and manoeuvring areas; iii) Avoid conflict with staff, customer and visitor vehicular and cycle movements; and iv) Ensure satisfactory and safe operation with the adjacent road system. 	
4.7 Lighting	b. Lighting design should address the principles of the CPTED where there is significant pedestrian activity, late night work shifts or safety and security issues.	Lighting details shall be provided addressing all principles of the CPTED. All lighting shall comply with A\$4282.
	 c. Adequate lighting should be provided to meet security requirements without excessive energy consumption. h. All lighting shall comply with 	
	AS4282.	

There are no other <u>relevant</u> provisions of *Penrith Development Control Plan 2010* that apply to the development proposal or site.

d) "any planning agreement entered into"

The development is not associated with any planning agreement or any draft planning agreement entered into under section 93F of the *Environmental Planning* and Assessment Act, 1979.

e) "the regulations"

The development is not subject to the Government's Coastal Policy. No masterplans are applicable for the development.

Demolition of part of the existing structure within the premises is the only matter prescribed by the Regulations. All demolition will (hardly any) occur in accordance with AS2601-2001 – The demolition of structures.

f) "the likely impacts of that development"

The development will have minimal impact on the environment, neighbourhood and locale. The likely impacts of the development are further expanded on the following pages.

Context & setting	 The proposed development will: Have no impact on the scenic qualities and features of the landscape. Be in accordance with the character and amenity of the locality and streetscape. Be consistent with existing development in the locale and on the site in terms of bulk, scale, character and design. Be in accordance with the permissible land-use applying to the site. The potential impacts on adjacent properties are also considered to be minimal. Overall, the impact on the context and setting of the locale is therefore considered to be satisfactory.
Access, transport & traffic	All access provisions to the development will not change. The existing access driveway from Castlereagh Road is considered satisfactory for the development and will not be changed or affected due to the proposed development. There is currently no conflict with the local road network due to the existing development, and this will not change with the new use of the premises. As already discussed within this statement, adequate parking provisions are available on the site and apply to the development. The new premises will not change or alter the existing parking configuration on the site. No additional construction or other requirements are therefore needed for the site.
PUBLIC DOMAIN	The development will in no manner impact on the public domain.
UTILITIES	The development will impose no significant demand on water, telephone, sewer and electricity utilities. These services are also existing and available to the site.

Heritage	No heritage provisions or considerations are applicable to the site.	
OTHER LAND RESOURCES	The premises will be integral and compatible with the current use of the site and neighbouring premises. The impact of the development in terms of other land resources is therefore considered minimal.	
	The development will not impact on the value of the land in terms of agricultural potential or other land resources (which is considered to be minimal).	
WATER	The development will have no significant impact on water resources or water conservation.	
Soils	The development will have no impact on soils.	
AIR & MICROCLIMATE	The development will have no impact on air and microclimate.	
FLORA & FAUNA	The development will have no impact on flora and fauna.	
ENERGY	The development will have no significant impact on energy.	
NOISE/VIBRATION	The development will have no significant impact from noise or vibration. The development will also not cause any significant noise or vibration.	
TECHNOLOGICAL HAZARDS	No known technological hazards pose a risk for the development.	
SOCIAL IMPACT	The development will have no significant social impact other than a positive social impact by providing for a much needed facility. The social impact overall is therefore considered to be a positive one.	
WASTE	The development site has already provision for the disposal of waste that will be generated by the development (commercial bin collection) Waste generation by the development is, however, expected to be minimal. There will be no major waste generation from the operation of the activity in comparison to other surrounding business (such as retail premises or fast food premises which have high waste generation rates).	
	For waste that is generated by the use and operation of the premises, adequate controls will be applied. Features to be incorporated in the development will include recycling of any cardboards, paper products and drink containers.	
	Waste and recycling storage areas are provided in accordance with Penrith City Council requirements.	
	A waste control container to be provided on site during demolition works and will be removed upon completion of demolition works.	
	All demolition waste, operational waste generation and disposal wil occur in accordance with the Waste Management Plan prepared for the development (see separate plan).	
SAFETY, SECURITY AND CRIME PREVENTION	Safety, security and crime prevention is an important aspect of the development that has been addressed by the applicant. The applicant understands that without satisfactory safety and security being offered to patrons, the successful operation of the facility would not work.	
	In addition to existing security fencing provided to the building, certain security and safety works are required for the premises. These will include the following:	
	 An upgrade of internal lighting (where needed). An integration of internal and external lighting with security systems The installation of associated sensor lighting at the entrance to the premises. 	
	Satisfactory safety, security and crime prevention measures are therefore to be employed for the premises.	

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ECONOMIC IMPACT	The proposed development will have a positive economic impact on the locale and its community through employment generation and economic activity of premises that are currently vacant. The proposed development will benefit surrounding land uses through increased patronage to the area. Adjoining property values will not be affected by the development.
SITE DESIGN AND INTERNAL DESIGN	The site design and internal design is considered to be satisfactory and in accordance with the provisions of the relevant DCP.
	The development proposes no change to site external design, other than the installation of signage. The internal design of the premises, although being altered with the intended demolition works, is considered to be satisfactory.
CONSTRUCTION	The proposed use requires only minor construction works to occur. Certain walls and ceilings within the premises are proposed to be provided within existing spaces, while all other fittings are to be replaced or relocated.
	A <u>construction certificate</u> approval is therefore required.
NATURAL HAZARDS	The development site has no known natural hazard risks and is not identified as being bushfire prone land or flood liable land.
CUMULATIVE IMPACTS	There are no significant or potential cumulative impacts that will occur as a result of the development.
	The minimal cumulative impacts of the development are therefore considered to be acceptable for the site and area.

g) "the suitability of the site for the development"

DOES THE PROPOSAL FIT THE LOCALITY	The proposal is considered to fit the locality well and neighbouring land uses.
	The development is in accordance with all the planning provisions applying to the site and will therefore be incorporated well into the locale.
ARE SITE ATTRIBUTES CONDUCIVE TO	The site attributes are considered to be conducive to development.
DEVELOPMENT	There are no risks or factors associated with the site that will significantly affect the development.

h) "the public interest"

The development will have minimal impact on public infrastructure as a whole and on the surrounding neighbourhood.

The development will also not significantly affect any neighbouring properties in terms of privacy, overshadowing, amenity, economic loss or any other impacts. The public interest is therefore considered to be satisfactory.

CONCLUSION:

As shown in this statement of the environmental effects, the proposed addition to the seed lab building addition is considered to be a satisfactory proposal.

The statement of environmental effects has addressed all of the planning controls applying to the site and has found the proposal to be compliant with these controls.

Based on the overall positive merits of the proposal and compliance with the development controls applying to the site, it is expected that approval for the works will be granted.

Appendix A – Photographs



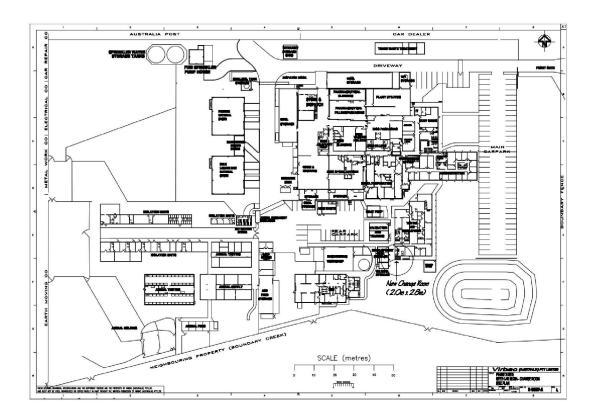
a) Virbac- View of front of property from Castlereagh Road, Penrith



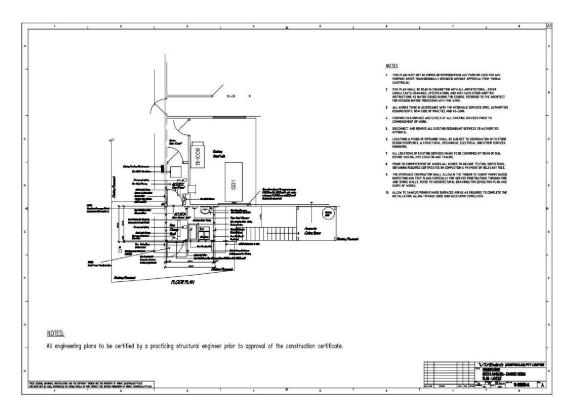
b) Existing single storey enclosure which is to be increased in area with 2.8 m x 2.0 m addition. New works to match existing building as closely as possible.

Appendix B – Existing & Proposed Floor Plans

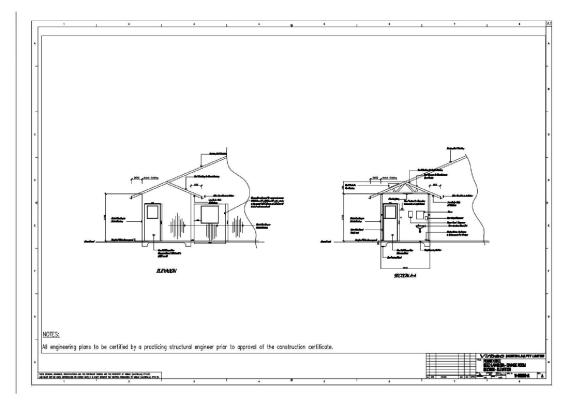
a) <u>Site Plan</u>



b) Floor plan sheet



c) Elevations and sections



Appendix C – Annual Fire Safety Statement

1.	ssued under the Environmental Pla		ty State		E and 170
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Туре	e of Statement: $$	Annual	\times Supplem	entary	V4.0
Nan	ne of Owner / Agent : Owners Address:				
	Agents Name: Agents Address:			x	
		Identification of	f Building		
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To be forwarded to the Council and a copy (together with a copy of the current Fire Safety Schedule), to the Commissioner of the Fire & Rscue New South Wales, email to AFSS@fire.nsw.gov.au.

- To be prominently displayed (together with a copy of the current Fire Safety Schedule), within the building.



WASTE MANAGEMENT PLAN

Outline of Proposal:

SUBJECT PREMISES:	Lot 1 DP 735733 (No. 2152) Castlereagh Road, Penrith
For:	"VIRBAC (Australia) Pty Ltd"
Phone:	Amit Patel New Projects Manager
	(02) 4725 4596
BUILDINGS ON SITE:	Numerous brick and metal clad buildings.
Proposal:	Proposed minor demolition and Building Additions – A new change room leading to the Seed Lab
COUNCIL:	Penrith City Council
The details on this form are the intentic	ons for managing waste relating to this project
DATE:	22 August 2014

SECTION 1 - DEMOLITION

Demolition of existing single storey enclosure.

Materials On-Site	DESTINATION					
		DISPOSAL				
Type of Material	Estimated Volume (m³) or weight (t)	ON SITE Specify proposed reuse or on-site recycling methods	OFF SITE Specify contractor and recycling outlet	Specify contractor and landfill site.		
Excavation material	Nil	On-site Reuse as landfill	N/A	N/A		
Green Waste	Nil	N/A	N/A	N/A		
Bricks/Masonry	Nil	N/A	N/A	N/A		
Concrete	0.5 m ³ approximately	N/A	Boral Crushing – Industrial Drive, Mayfield West Ph: 4967 5988	Any off-site disposal to "Hallinan's Recycling Centre, 37 Lee Holm Road, St Marys". Ph: 9833 0883		
Timber	Nil	Nil	N/A	N/A		
Roof tiles	Nil	N/A	N/A	N/A		
Plasterboard	0.5 m ³ approximately	N/A	N/A	N/A		

Metals – - Framework - Sheet walls and roof - Pipework and wiring. - Other ancillary.	Maximum 0.5 tonne	Nil on-site use.	All metals will be recycled. Probable destination for recycling outlet will be: "SimsMetal Ltd" 76 Christie Street, St Marys	Nil landfill disposal is proposed for any metals.
Other – - Plastics/PVC/UPVC - Paper & cardboard	Approximately 0.2 tonne	Nil on-site use.	General waste that can possibly be recycled will be recycled. For example, paper products will be fully recycled. Probable destination for recycling outlet will be: "WSN Environmental Solutions" – Eastern Creek. Other materials that can be re- used (eg. kitchen cupboards) to be sold as second hand.	Probable destination for disposal of non-recyclable materials will be: "WSN Environmental Solutions" – Eastern Creek.

SECTION 2 - CONSTRUCTION

Materials On-Site	DESTINATION					
Type of Material		DISPOSAL				
	Estimated Volume (m³) or weight (t)	ON SITE Specify proposed reuse or on-site recycling methods	OFF SITE Specify contractor and recycling outlet	Specify contractor and landfill site.		
Excavation material	Nil	N/A	N/A	N/A		
Green Waste	Nil	N/A	N/A	N/A		
Bricks/Masonry	Nil	N/A	N/A	N/A		
Concrete	Approximately 0.5m ³ in total.	Any excess concrete spill to be used in base for future driveway works. Otherwise, materials returned in concrete truck.	No off site concrete material is expected.	There is no concrete waste. The concrete truck will return any other unused concrete mix to the plant for re-use, if required.		
Timber	Nil	Nil	N/A	N/A		
Roof tiles	Nil	N/A	N/A	N/A		
Plasterboard	Nil	Nil	N/A	N/A		

 Metals – Framework Sheet walls and roof Pipework and wiring. Other ancillary. 	Maximum 0.5 tonne approximately Very minimal volume as panels are pre-made off- site.	Nil on-site use.	All metals will be recycled. Probable destination for recycling outlet will be: "SimsMetal Ltd" 76 Christie Street, St Marys	Nil landfill disposal is proposed for any metals.
Other – - Plastics/PVC/UPVC - Paper & cardboard - Containers	Approximately 0.4 tonne	Nil on-site use.	General waste that can possibly be recycled will be recycled. For example, paper products will be fully recycled. Probable destination for recycling outlet will be: "WSN Environmental Solutions" – Eastern Creek. Existing cardboard recycling contractor can be used.	Probable destination for disposal of non-recyclable materials will be: "WSN Environmental Solutions" – Eastern Creek.

SECTION 3 - ON-GOING USE

Type of waste to be generated:

In general, the type of waste expected to be generated will be comprised of <u>recyclables</u> and <u>non-recyclables</u>. This development will generate the following types of waste:

Recyclables:

- Aerosol cans
- Aluminium cans
- Metal drums / Plastic containers
- Recyclable cardboard / paper
- Recyclable confidential paper

Non-recyclables:

Water from the hand wash basin only which is discharged to the sewer only.

Expected volume per week:

- The expected total volume per week is difficult to determine but would be expected to not exceed 10 liters per week on an average basis. Where possible, a majority of the waste will be sought to be recycled. This is because the building works relate to a 2.5 square metre addition only.
- Approximately two 240L MGB containers will be used for waste collection and storage (both recyclable and non-recyclable).

On-site storage:

- One general waste bin and one recycling bin to be located within the premises. Waste in these bins will be disposed of to the commercial bin collection facility located at the front of the site. The existing bin will be used.
- Collection of bins by a commercial waste contractor will occur via the existing collection area.

SECTION 4 - ON-GOING MANAGEMENT

Site waste collection to be undertaken by private contractors as per our existing agreements with different contractors.

The private contractor's details are as follows:

Recyclables:

Waste Type	Transport Contractor	Treatment Facility	Treatment, Recycle / Recondition
Aerosol Cans	Veolia	Chemsel	De-gas and recycle.
Aluminium Cans	In-House	Norms Scrap Metal	Recycled
Metal Drums / Plastic Containers	Drum Reconditioners (NSW) Pty Limited	Drum Reconditioners (NSW) Pty Ltd, Wetherill Park, NSW	Reconditioned or incinerated.
Recyclable cardboard/Paper	Grima Recycling	Visy Recycling Amcor Cardboard King	Recycle
Recyclable Confidential paper	Shredfast (Australia)	Paperaway Amcor Fine paper	Recycle

Non- Recyclables:

Waste Type	Transport Contractor	Treatment Facility	Treatment, Recycle / Recondition
General Waste	J.J. Richards Pty Ltd	WSN Environmental Solutions Eastern Creek	Landfill
Liquid Moxidectin Waste. (EPA Code J120)	Sterhealth Pty Ltd	Sterihealth Pty Ltd	High temperature incineration
Liquid Waste (Trace mercury and selenium) (EPA Code N2O5)	Veolia Pty Ltd	Transpacific, NSW	Treated and discharged to sewer.
Nitrogenous Waste (EPA Code Z140)	Veolia Pty Ltd	Earthpower	Bio-treatment and recycling, producing electricity.
Trade Waste Effluent	Via sewer	Sydney Water	Process through the Sewage Treatment Plant (Bio-treatment)
Waste for incineration	Sterihealth Pty Ltd	Sterihealth Pty Ltd	High temperature incineration
(Solid, EPA Code R100)			

Other on-going management features include:

- Development of waste minimisation program for operation of the facility.
- All temporary storage areas and bin collection areas shall be clearly labeled and identified.
- All recycling areas and storage shall be clearly labeled and identified.
- All storage areas will be cleaned, maintained and kept in a tidy condition throughout.