



2 Wella Way
Somersby NSW 2250
Australia

1300 300 641

info@spaceurban.com.au

spaceurban.com.au

Tuesday 28 June 2022

Att: Bianca Thornton
Industry Assessments
NSW Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Sir/Madam

RE: SSD9418 - Greenspot Hunter Valley Nutrient Recycling Facility – Amendment Report

As requested by the Department on Friday 24 June 2022, this letter report has been prepared to document the revisions made to SSD9418 since the original EIS was lodged for assessment in late 2019. Aspects of the development have been amended to reduce the potential impacts from the operations, particularly in relation to the receipt of Food Organics. This letter report provides details of the revised development as required under Clause 37 of the Environmental Planning and Assessment Regulation 2021 (EP&A Reg 2021). This letter report should be also considered in conjunction with ***Greenspot Hunter Valley – Nutrient Recycling Facility – Response to Submissions*** dated 20 June 2022.

Overview and Background

Bettergrow Pty Ltd (Bettergrow), trading as 'Greenspot Hunter Valley' (the Proponent), is proposing to undertake the expansion and operation of an existing nutrient recycling facility (the Proposal) on Lot 10 DP1204457, 74 Lemington Road, Ravensworth, NSW (the site).

Current composting operations at the site are approved by DA140/2016 and allow the receipt of up to 76,000 tonnes per annum (tpa) of biosolids and garden organics. The Proponent for DA140/2016 was Bettergrow who are contracted by AGL Macquarie (the Landowner) to supply manufactured soil ameliorant and rehabilitation products for use, in part, for approved rehabilitation works at the Ravensworth No. 2 mine and Ravensworth South mine.

The current Proposal seeks to authorise the receipt of up to 200,000tpa of organic materials, including new feed sources of garden waste, to facilitate the sale of a portion of the composted material to third parties. The recovered resources would be transferred either directly to end use markets or to other facilities or processors for value adding to achieve maximum value for the beneficial use.

The proposal as described in the Project EIS 2019 includes the following key components:

- Receive a total of up to 200,000tpa of organics,
- Transfer of the composted material to other AGL Macquarie sites such as the Liddell Ash Dam, Liddell Power Station and Bayswater Power Station for use in rehabilitation as per existing approval,
- Sale of a portion of the finished 'compost' to third parties as per DA140/2016 as modified,



- Upgrading of a proportion of the hardstand area and installation of an aerated composting system such as the Mobile Aerated Floor (MAF) (or equivalent) suitable for the management and composting of other organics,
- Completion of the capping of the hardstand area and expansion of leachate dam as approved as part of the Stage 2 development application to facilitate the management and storage of the increase in organic inputs,
- Installation of a single lane weighbridge approximately 27.5m long,
- Installation of covered hard stand areas for the receipt and blending, if required, of incoming organics,
- Installation of a dedicated trailer wash bay,
- Installation of two 25,000 litre recycled drill water storage tanks, and
- Installation of a machinery shelter that will allow storage of tools and machinery for servicing.

The Proposal is located within an area that is dominated by coal mining and heavy industrial activities, including power generation and related activities. As such the Proposal is within a highly altered environment and is generally compatible with surrounding land use.

On 21 February 2020, a meeting was convened with the Department and the Environment Protection Authority (EPA) to discuss comments provided in their submission dated 23 January 2020. A major concern of the EPA was the composting of Food Organics in open windrows, rather than within an enclosed building.

Following ongoing consultation with both the Department and EPA (see **Table 2**), it was proposed to remove Food Organics from the project description to address concerns raised by the EPA. This report documents the revised project.

Revised Project

The revised Project does not include any additional infrastructure beyond that outlined under the 2019 EIS and seeks to remove components and simplify for the operations. The revised Project includes the relocation and removal of some site infrastructure to better streamline site operation under the modified design. In summary, the proposed changes to the design include:

- Removal of mixed Food and Garden Organics (FOGO), as defined in Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act), waste stream from the Proposal. Garden Organics (GO) will still be accepted,
- Removal of the Mobile Aerated Floor (MAF) for mixed Food and Garden Organics (FOGO) processing. The MAF was described in Section 3.2.2.4 of the Facility EIS (2019),
- Removal of the FOGO product receipt and blending shelter. The product receipt and blending shelter was described in Section 3.2.2.7 of the Facility EIS (2019),
- Removal of food waste as an acceptable item from kerbside green bin waste collection. Kerbside green waste will be limited to garden organics only, and
- Extension of the Processing Pad approved under DA 140/2016 in the eastern portion of the subject site to include an additional approximate 4.93 ha of processing area. Surface water controls (e.g. bunding, surface water drainage and design) applied to the processing pad under the 2019 EIS are still applicable to the revised Project. The additional processing area now also extends into those areas where the FOGO product receipt and blending shelters were proposed.



Figure 1 shows the development footprint of the Proposal under the 2019 EIS, while **Figure 2** illustrates the revised Project, and **Table 1** provides a comparison between the current 2019 EIS Project and the revised Project.

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Legend

- Project Area
- Lot Boundaries

Project Features

- 1 - Leachate / Sediment Control Dam
- 2 - Stormwater Discharge and Infiltration Area
- 3 - Weighbridge
- 4 - 50,000L Drill Water Receiving Pit
- 5 - Machinery Storage Shelter
- 6 - Product Receiving and Blending Shelter
- 7 - Truck Wash
- 8 - AGL Water Supply Tank
- 9 - MAF FOGO Processing Area
- 10 - Compost Processing Areas
- 11 - Inground Dirty Water Tank
- 12 - Proposed Rock Drain

Path: C:\Users\Deaneb\OneDrive - BORG PTY LTD\General\8.0_GIS\02_Projects\NSW_Ravensworth\JMPI_0039_Fig01_WorkAreas.aprx

Figure:
1

Original 2019 Layout



Source: Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, USGS, Maxar, NSW DFSI - 2021, RPS - 2019

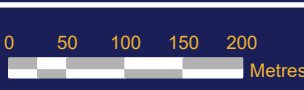
Nutrient Recycling Facility
Lot 10 DP1204457, 74 Lemington Road,
Ravensworth, NSW

User: deaneb

Version 1

Date: 1/03/2022 11:00 AM

Scale: 1:6,500



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Legend

- Project Area
- Lot Boundaries

Project Features

- 1 - Leachate / Sediment Control Dam
- 2 - Stormwater Discharge and Infiltration Area
- 3 - Weighbridge
- 4 - 2 x 25,000L Drill Water Receival Pits
- 5 - Machinery Storage Shelter
- 6 - Truck / Trailer Wash
- 7 - AGL Water Supply Tank
- 8 - Compost Processing and Blending Areas
- 9 - Dirty Water Pit (wash bay)
- 10 - Proposed Rock Drain

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Figure:
2

Proposed Site Infrastructure & Layout - 2022



Source: Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, USGS, NSW DFSI - 2021, RPS -2019, Nearmap - 2022

Nutrient Recycling Facility
Lot 10 DP1204457, 74 Lemington Road,
Ravensworth, NSW

User: deaneb

Version 1

Date: 21/04/2022 2:02 PM

Scale: 1:6,000



Table 1 - Ravensworth Nutrient Recycling Facility – Revised Development 2022

ELEMENT	2019 EIS – PROPOSED DEVELOPMENT	REVISED DEVELOPMENT PROPOSAL 2022
Use	Resource recovery facility for composting and nutrient recycling	Resource recovery facility for composting and nutrient recycling
Processing capacity	Total up to 200,000tpa	Total up to 200,000tpa
Site Area	Site and development footprint is approximately 57ha in area.	Site and development footprint is approximately 57ha in area.
Hours of Operation	7am to 5pm Monday to Friday. 8am to 1pm Saturdays. No work on Sundays or Public Holidays.	7am to 5pm Monday to Friday. 8am to 1pm Saturdays. No work on Sundays or Public Holidays.
Receival	One weighbridge and load inspection bay	One weighbridge and load inspection bay
Site Infrastructure	<ul style="list-style-type: none"> Processing pad Surface water drainage Leachate dam Site access and parking Site office and staff amenities 300,000 litre water storage Mobile aerated floor (MAF) Machinery shelter Trailer wash Product receival and blending shelter Weighbridge Drill water receival pit 	<ul style="list-style-type: none"> Processing pad Surface water drainage Leachate dam Site access and parking Site office and staff amenities 300,000 litre water storage Machinery shelter Trailer wash Weighbridge Drill water receival pit
Received wastes	<ul style="list-style-type: none"> Urban wood residues for Composting (as defined in 'The compost order 2016'), Paper Crumble for Composting (defined as General or Specific Exempted Waste), Wastewater from Bayswater mine Void 4, Drill mud process water (as defined in 'The Treated Drill Mud Order 2014'), Natural organic fibrous Composting material (as defined in Schedule 1 of the POEO Act), Coal ash which meets the conditions of 'The coal ash order 2014', Biosolids, Garden Waste (as defined in Schedule 1 of the POEO Act), and Food and Garden Organics (FOGO) (as defined in Schedule 1 of the POEO Act). 	<ul style="list-style-type: none"> Urban wood residues for Composting (as defined in 'The compost order 2016'), Paper Crumble for Composting (defined as General or Specific Exempted Waste), Wastewater from Bayswater mine Void 4, Drill mud process water (as defined in 'The Treated Drill Mud Order 2014'), Natural organic fibrous Composting material (as defined in Schedule 1 of the POEO Act), Biosolids, and Garden Waste (as defined in Schedule 1 of the POEO Act).

ELEMENT	2019 EIS – PROPOSED DEVELOPMENT	REVISED DEVELOPMENT PROPOSAL 2022
Waste Sources	<ul style="list-style-type: none"> Commercial kitchens and restaurants (food organics), Kerbside green waste collection from residential households (food and garden organics), Hunter Water and Sydney Water (biosolids), Sawmills (wood residues), Paper processors (paper crumble), Infrastructure projects (drill muds), Power stations (coal ash), Mines (raw water), and Food processors (organic fibrous material). 	<ul style="list-style-type: none"> Kerbside green waste collection from residential households (garden organics only), Hunter Water and Sydney Water (biosolids), Sawmills (wood residues), Paper processors (paper crumble), Infrastructure projects (drill muds), Mines (raw water), and Food processors (organic fibrous material).
Operational Equipment	<ul style="list-style-type: none"> 1 x green waste shredder (if required), 1 x trommel or stardeck screen, 1 x 24 tonne excavator, 3 x 33 tonne front end loaders, 1 x top turn windrow turner, 2 x 15,000 litre water trucks, and 4 x light vehicles. 	<ul style="list-style-type: none"> 1 x green waste shredder (if required), 1 x trommel or stardeck screen, 1 x 24 tonne excavator, 3 x 33 tonne front end loaders, 1 x top turn windrow turner, 2 x 15,000 litre water trucks, and 4 x light vehicles.
Traffic Generation	Up to 146 movements per day	Up to 146 movements per day
Workforce	Up to 15 operational jobs	Up to 15 operational jobs

Statutory Context

Refer to **Section 5**, Page 61 of the 2019 EIS for details on Planning and Statutory requirements for the Project. A review has been undertaken of **Section 5** against the current legislative requirements relative to the Project. Whilst legislation has been revised since 2019, the amended Project description does not alter either the assessment pathway, project intensity, or trigger consideration of any new legislation that may have been gazetted since the 2019 EIS was prepared. The changes to the application reduce the impacts of the proposed development.

Stakeholder Engagement

Stakeholder engagement has occurred with both the Department and the EPA prior to the preparation of this amendment report. Please see **Table 2** below for details. Meeting minutes are also provided as **Attachment A**.

Table 2 – Summary of Stakeholder Engagement

DATE	STAKEHOLDER	REPRESENTATIVES	MODE OF CONSULTATION	CONSULTATION DETAILS
21.2.2020	Department of Planning, Industry, and Environment Environment Protection Authority	Bianca Thornton (DPIE) William Hodgkinson (DPIE) Melissa Moore (EPA)	Meeting in person / Team	Meeting to discuss submission provided by the EPA on 2019 EIS

DATE	STAKEHOLDER	REPRESENTATIVES	MODE OF CONSULTATION	CONSULTATION DETAILS
17.2.2022	Department of Planning and Environment Environment Protection Authority	Bianca Thornton (DPE) William Hodgkinson (DPE) Sheelagh Laguna (DPE) Melissa Moore (EPA)	Teams meeting	Meeting to discuss potential changes to the development that would address the EPAs concerns regarding food organics
10.3.2022	Department of Planning and Environment Environment Protection Authority	Bianca Thornton (DPE) Sheelagh Laguna (DPE) Melissa Moore (EPA)	Email	Provision of updated layout plan to support amending the proposed development to remove food organics and associated buildings for FO sorting

Summary of Impacts

Table 3 below indicates whether there is any change (increase, decrease, or none) to the impacts already assessed as part of the 2019 EIS.

Table 3 – Summary of Impacts

ENVIRONMENTAL ASPECT	CHANGE TO IMPACTS?	COMMENTS
Air Quality (dust and odour)	Yes. Decrease in odour impacts	As a result of removing food organics there will be a reduction in the odour generation from the facility (refer to the Odour Assessment addendum report provided with the RTS). An additional dust assessment was prepared as part of the RTS report in relation to PM _{2.5} and cumulative impacts. The replacement of food organics with garden waste will not alter the dust generation from the development.
Surface Water	None	There will be no increase to the impacts of surface water or any change to the management requirements.
Groundwater	None	There will be no increase to the impacts of groundwater or any change to the management requirements.
Traffic and Access	None	The removal of FOGO and FO will not change the traffic impacts of the proposal. Garden waste will replace the FOGO and FO volumes.
Noise and Vibration	None	The removal of FOGO and FO will not change the noise and vibration impacts of the development.
Biodiversity and Bushfire	None	There is no increase to the area of disturbance from the proposed change, therefore there will be no additional impact to biodiversity of bushfire.
Visual	None	There will be no change to the visual impacts of the development as a result of the removal of FOGO and FO.
Aboriginal and Historic Heritage	None	There will be no additional impact to Aboriginal or historic heritage as a result of removing food organics from the proposal.
Socio-economic	None	The removal of FOGO and FO from the proposal does not alter social and economic factors, however there will now be no increase in capacity to process FOGO and FO.
Fire and Incident Management	None	There is no change to the management of fire and incidents as a result of removing FOGO and FO from the proposal.
Hazard and Risk	None	There is no change to the risk profile as a result of removing FOGO and FO from the proposal.



ENVIRONMENTAL ASPECT	CHANGE TO IMPACTS?	COMMENTS
Waste Management	None	The removal of mixed FOGO and FO does not alter the method with which waste are to be managed onsite.

Justification and Conclusions

The proposed expanded development will provide biologically active organic material to ameliorate soils across AGL Macquarie’s lands, facilitating the successful rehabilitation of the Ravensworth No. 2 and Ravensworth South Mines. Composted organic material will be used to improve soils across both existing and new rehabilitation areas. The increase capacity will also expedite the rehabilitation of disturbed mining areas and provide a sustainable and cost-effective option for soil improvement.

The expansion of the facility up to 200,000tpa will also provide additional capacity to process an increased source of organic materials, and service the demand for composted organics in the broader wholesale market.

To reach waste diversion targets, the NSW government has identified the need for additional waste infrastructure to receive, process, and generate recycled organics for beneficial reuse. The decision by the NSW EPA to prohibit the application of Mixed Waste Organics to land has further increased the need for infrastructure capable of processing green waste from council kerbside collections, and other sources.

The removal of Food Organics as a feedstock for the development will reduce the potential for odour impacts and will allow the processing of an increased volume of garden organics from kerbside collection and greenfield sites cleared for development.

The Greenspot Hunter Valley proposal compliments Bettergrow’s existing operations across NSW, including the Wetherill Park Resource Recovery Facility (SSD 7401), which is a key piece of waste infrastructure assisting the State government to meet its objectives to divert waste from landfill.

The increased capacity of 200,000tpa at Greenspot Hunter Valley will allow the facility to continue to produce high quality composts suitable for land application in both farming and rehabilitation, and further enhance the availability of waste infrastructure in the local region.

Should you require any further information or clarification please contact the undersigned on 0419 715 665 or smithsk@spaceurban.com.au.

Regards

Shaun Smith
Principal Environmental Planner
Space Urban Pty Ltd

Incl:

Attachment A – Meeting Minutes



ATTACHMENT A – MEETING MINUTES

Minutes

Unit 2A, 45 Fitzroy Street
Carrington NSW 2294
T +61 2 4940 4200

Reference:	PR141357-1
Meeting Name:	RTS Meeting
Meeting date:	21 February 2020
Meeting location:	DoPIE Offices, Parramatta

Attendees

Name	Initials	Company	Role
Bianca Thornton	BT	Department of Planning, Industry and Environment	Environmental Assessment Officer
Melissa Moore	MM	Environment Protection Authority	Acting Head Waste Compliance, Newcastle
William Hodgkinson	WH	Department of Planning, Industry and Environment	Senior Environmental Assessment Officer
John Vyse	JV	Bettergrow Pty Ltd	Organics Business Manager
Shaun Smith	SS	RPS Group	Principal Environmental Planner

Items

Ref.	Item
1.	Meeting open at 11:40am by BT and WH.
2.	MM stated that Victorian composting guidelines to be used in the absence of updated NSW guidelines.
3.	MM stated that robust justification and / or additional mitigation measures required to depart from enclosed composting of FOGO.
4.	MM also stated that odour impacts needed to consider impacts to the surrounding environment, including workers and fauna in the vicinity of the operations.
5.	JV stated that Bettergrow are generally comfortable with the EPAs request for additional information and that further information would be supplied to address all comments, including that outlined in Item 3 above.
6.	MM requested that the cumulative impacts of the LOOP development be further addressed, either by additional modelling or further justification.
7.	SS advised that limited information was available on the LOOP development following an FOI request to Singleton Council. Information could not be recorded, photographed or copied when the documents were viewed at Council. Request that MM discuss internally as to the best approach in the absence of specific information on the LOOP development.
8.	Singleton Council submission discussed. Further information to be provided to Singleton Council. It was noted by BT that there was repetition in the Singleton Council submission.

Minutes

Ref.	Item
9.	MM dialled back in to meeting to confirm that modelling should be undertaken to include the LOOP development and that information from the sites EPL, capacity, and feedstock be used to make assumptions for modelling.
10.	Meeting close 12:40pm.

From: [Shaun Smith](#)
To: [Bianca Thornton](#); [Sheelagh Laguna](#)
Cc: [Melissa Moore](#)
Subject: Revised Layout - SSD9418
Date: Thursday, 10 March 2022 11:51:00 AM
Attachments: [SSD9418_Revised Layout_10032022.pdf](#)
[141357 Figures & Proposed Site Layout &_84P_20190903.pdf](#)

Hi Bianca,

I have finally been able to revise the figure for SSD9418. I have attached both the revised figure and the figure that we included with the original application.

As you will note we have removed some components of the development that related to the processing of Food Organics and some other items of infrastructure have been moved to new locations within the project area. We have removed the MAF also as this is no longer required when composting only Garden Organics. We have also updated the processing areas on the pad so it mirrors the existing pad design as approved under the Singleton Council DA and engineering design.

Could you please review and come back with any comments.

I have been speaking with the odour consultant and she is preparing to revise the odour assessment based on the new layout.

Thanks

Shaun



A Borg Company

Shaun Smith
Principal Environmental Planner
p:1300 300 641 | m:0419 715 665
e:smithsk@spaceurban.com.au
w:www.spaceurban.com.au
a:2 Wella Way Somersby NSW 2250