Initial Technical Review of MRL Works Approval Application

Prior to formally accepting Landfill Operations Pty Ltd’s Melbourne Regional Landfill (MRL) Works Approval Application (WAA), the application has been subject to a “rapid review” by EPA’s Development Assessment Unit and specialists within EPA’s Applied Sciences Group and Specialist Regulatory Services Unit to determine if there is sufficient information (plans, specifications and other information and a summary thereof) to accept and assess the WAA as per 19B(1)(c) of the Environment Protection Act 1970. The outcome of this review is that it is considered that further information is required and that the MRLWAA is not accepted. The further information required is set out below.

Leachate Management (Section 16 & Appendix G)

1. Drainage parameters as per BPEM. One of the BPEM requirements for leachate volume calculations is to consider 1-in-20 year storm event after one lift of waste has been placed. BPEM further requires designing drainage measures to contain and control rainfall runoff for 1-in-20 year storm event for a putrescible landfill. It is not clear whether these aspects have been considered in the Model and in designing drainage measures. The Model appears to have only considered the average rainfall data (see Appendix G, Scenarios 1, 2, 3 and Table 6). Clarification is requested of the parameters used, with recalculations and revisions required as appropriate.

Landfill Gas Management (Section 18 & Appendix H)

2. The GasSim input data used in the modeling has not been provided. As this includes some critical information which affects the results of the model, this information is required to establish the veracity of the model.

3. Specific details (‘a response plan’) on what actions will be taken to address landfill gas odours, if confirmed, are not provided and should be outlined.

Traffic Management and Traffic Impact Assessment (Subsection 19.1 and Appendix I)

4. Further information is required to demonstrate compliance with BPEM Traffic Considerations, with the following specific requirements identified:
   a) The proposed truck route to the Site appears to be via Christies Rd to the east and then Riding Boundary Road, however no certainty is provided on this (subsection 19.1.5 bullet point 2 only states “Restriction of truck entry routes. All heavy vehicles are expected to ….”), nor is there any further information on any traffic control devices/measures/enforceable contract arrangements that would restrict truck movements to this route. Additionally it is not clear if ‘truck entry also covers trucks exiting the site’. Clarification and details of any route restriction measures should be provided, noting this should apply not just to trucks but also public vehicles that may be depositing waste at the Community Transfer Station.
   b) It is unclear if there is a need for and what if any traffic control devices (i.e. traffic islands and merging lanes) will be implemented at the site entrance and egress points off Riding Boundary Rd and on the junction with Christies Rd (and/or Hopkins Rd if in fact traffic will use this western route).
   c) Whilst the TIA in Appendix I discusses existing Accident Statistics over the last five years in section 2.2.4, it is not clear if the road network considered here just relates to roads to the east of the site (i.e. along the ‘proposed entry routes’) or also to the network to the west (i.e. Hopkins Rd). Furthermore, the TIA does not then discuss or report on whether accident rates will be influenced by the proposed extension with greater numbers of vehicles (and throughout the 24 hour period, not the current opening times).
   d) The TIA focuses on peak hour traffic flow impacts, such that it is unclear if there will be any effect on the local road network and traffic flow derived effects from the longer 24 hour opening time now proposed.

Air Emissions (Subsection 19.7 & Appendix J)

5. Technical justification is required for using two metrological years (2008 and 2009) for the odour dispersion modelling rather than the five years that should be used as specified in GUIDANCE NOTES FOR USING THE REGULATORY AERMOD AIR POLLUTION MODEL, EPA Publication 1551 Revision 6 February 2015.
Initial Technical Review of MRL WA Application

Fires & Hotspots (Subsection 19.9)
6. Noting that there is a distinction needs between landfill fires and sub-surface hotspots, further information is required on actions to prevent, locate and extinguish sub-surface hotspots as none are presently contained in this section. The further information could be provided in a Sub-surface Hotspot Management Plan.

Greenhouse Gas Generation (Subsection 19.17)
7. No definite proposals are set out in the WAA for the minimisation of fuel use, with a series of options set out. The WAA should set out (the preferred option(s) if a decision has in fact been made, or if not how they will be assessed and the criteria for selecting which options will be implemented. This could be provided in a fuel usage (GreenHouse Gas) Minimisation Plan.

Accordingly, Landfill Operations Pty Ltd are hereby requested to update and provide the further information specified above to satisfy the requirements of 19B(1)(c).

It is additionally noted that if any updates are made to the Planning Permit Application, prior to its acceptance, a check should be made of the WAA (with updates made as necessary) to ensure consistency between the two sets of application information.

It is highlighted that the above comments and requests are made following a rapid review of the WAA, and that further technical issues and requests for further information may be subsequently during the technical assessment of the WAA.