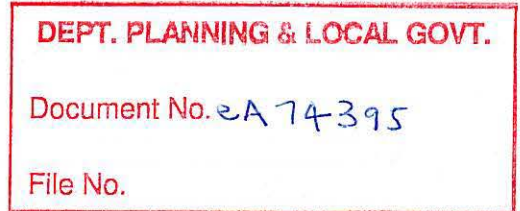




Our Ref: 10786

1 April 2009

Mr Lee Webb
Chief Environmental Officer
Environmental Impact Assessment Unit
Development Assessment Branch
Department of Planning and Local Government
Level 5, 136 North Terrace
Adelaide SA 5000



Dear Lee,

Northward Fill Landfill (Inkerman)

Variation to Accommodate Low Level Contaminated Waste - Response to Submissions

QED Pty Ltd, on behalf of Transpacific Waste Management Pty Ltd, refer to your recent correspondence dated 12 March 2009 pertaining to the summary of representations received pursuant to Section 47 of the *Development Act 1993*, concerning the amendment of an EIS. This correspondence acts as the formal response to the submissions received by the Department of Planning and Local Government.

We confirm that the variation to the Major Development Approval will allow the receipt of low level contaminated wastes at the Northward Fill Landfill (Inkerman) site.

Following the four week public notification period for the aforementioned variation, eleven (11) submissions were received by the Department of Planning and Local Government. These will be addressed below under the group headings of State Government, Local Government and public responses.

State Government

A total of nine (9) State Government Departments/Agencies were consulted during the submission period.

The following five (5) State Government Departments reviewed the proposal, and had no comments to make on the proposed amendment:

- Department for the Premier and Cabinet;
- Department for Primary Industry and Resources South Australia;
- Department of Health;
- Department for Environment and Heritage; and
- Zero Waste SA.

Environment Protection Authority (EPA)

Transpacific Waste Management Pty Ltd consulted extensively with the EPA during the development of this application. Resultantly, the potential concerns of the EPA were addressed in the formation of this application.

The EPA have stated within their response that they have no issue whatsoever with the proposed variation to the Inkerman Landfill to receive Low Level Contaminated Wastes, as it satisfies their stringent noise, air quality and stormwater management controls.

Office of Major Projects and Infrastructure (OMPI)

OMPI requested that Transpacific Waste Management comment on the issue of energy generation/flaring from gas emissions and leachate management. As outlined within the original application, the gas generated from the site will be monitored on a regular basis to ensure gas quality is maintained and that effective gas destruction methods (flaring, power generation etc) can occur. The management of this will be incorporated into the site's existing systems. Similarly, details of the leachate management system were outlined within the application, and are to the satisfaction of the EPA.

Department for Transport, Energy and Infrastructure (DTEI)

DTEI expressed concern about the ability of the intersection of Primes Road and Port Wakefield Road to accommodate a certain turning movement for road trains and B-Double vehicles. The intersection in question is not currently utilised for turning movements of this nature and this application does not propose to change this. As such, the upgrading of this intersection is not relevant to this application.

Department for Water, Land and Biodiversity Conservation (DWLBC)

DWLBC requested that a scale drawing of the development overlaid on a recent aerial photograph be provided. It should be noted that the proposed location of the LLCW cell will be contained within the current approved landfill site, for which a thorough assessment of potential impacts was undertaken. Having been already evaluated and approved, we do not believe there is any further requirement to provide additional aerial photography.

Local Government

The Wakefield Regional Council and Stephen Griffiths MP JP (Member for Goyder) expressed concern over dust transfer from the site. As detailed above, the proposal satisfies the EPA's criteria for air quality. All operations will be undertaken in accordance with EPA guidelines.

The Wakefield Regional Council has requested quarterly reports be produced as part of the annual report to the EPA, and that these also be provided to the Council. It should be noted that Transpacific already partakes in regular meetings with the Local Community Consultative Committee, upon which Council has a representative. These meetings are held on a quarterly basis through construction phases of the facility, half yearly when day to day operations are occurring as well as on an as needs basis should special issues arise. It is our view that this is an appropriate forum to relay important information to Council and the Community, allowing not only information to be distributed, but gives an opportunity for issues to be raised and resolved.

Public

Three submissions were received by the public. These raised a number of environmental concerns, relating to leachate control, management of local ecosystems, wind and dust monitoring, odour and visual impact, groundwater contamination and buffer zones. Other issues include public health impacts, and the affect on livestock. These issues have been discussed with the appropriate State Government referral bodies, and have been addressed to the satisfaction of these agencies. It should be noted that many of the concerns raised within the public submissions were in relation to the operation of the existing facility, as opposed to the proposed amendment, and therefore are not relevant to this assessment.

Conclusion

The proposed variation to the Northward Fill (Inkerman) Major Development Approval will result in the Inkerman landfill being able to safely accommodate a wider range of waste materials. The expansion of the landfill site for this purpose makes economic and environmental sense, and represents a logical and efficient strategy for dealing with Low Level Contaminated Wastes. This proposal has been prepared through extensive consultation with the Environment Protection Authority, and all care has been taken in the planning phase to minimise the impacts on the environment and the locality.

We trust the above discussion addresses the key issues raised by the representations received. If there are other outstanding matters to address, please do not hesitate to contact me on telephone 8227 0188.

Yours sincerely,



Damien Ellis
Senior Urban Planner
QED Pty Ltd