

Andrew Clark

Environmental Health Officer

26 November, 2013

Helen Mulligan  
Unit Head –Waste Operations EPA  
Locked Bag 914,  
COFFS HARBOUR NSW 2450

Dear Helen

**RE: Woodenbong Waste Facility – Notice of Variation to Environmental Protection Licence 13101**

I refer to an inspection of the Woodenbong Waste and Recycling facility by EPA Officers on the 12 August 2013 and proposed variation to Councils environmental protection licence 13101 under section 58 of the Protection of Environmental Operations Act 1997.

Please be advised Council has reviewed the proposed variations to its EPL. Variations **05.1, 05.3, 06.3, 06.5** and **06.6** and provide the following comments.

**05.1 The licensee must take all practicable steps to control entry to the premise.**

**Background** - The Woodenbong Facility currently has chain mesh gates installed at the main entrance which is padlocked shut when landfill is closed. The remaining fence consists of four barded wires through wooden posts. Council considers this adequate to control entry to this facility and is consistent with the surrounding amenity.

**Response-** It is Council's view that the above mentioned fencing and security measures meet the proposed variation and as such if the licence is so varied the facility is compliant.

**05.2 The licensee must install and maintain lockable security gates at all access and departure locations.**

**Background** -The Woodenbong Waste Facility has only one access and departure point. This access and departure point is currently equipped with chain mesh lockable security gates.

**Response** - - It is Council's view that the above mentioned security gate meet the proposed variation and as such if the licence is so varied the facility is compliant.

### **5.3 The licensee must ensure that all gates are locked whenever the landfill is unattended.**

**Background**--The Woodenbong Waste Facility security gates are closed and secured by staff at the close of each business day. Council does however rely upon private contractors to undertake waste compaction, covering operations and haulage of recyclables. Contractors are directed to keep gates closed while undertaking compaction, covering of waste and while loading out recyclables.

**Response** – - It is Council's view that the above mentioned security measures meet the proposed variation and as such if the licence is so varied the operations are compliant.

### **06.3 The licensee must have in place a leachate management system that contains any leachate generated from the waste disposed at the premise.**

**Background** -- In February 2013, major works were undertaken at the Woodenbong Waste Facility within its active waste cell to control the collection and disposal of leachate in accordance with the NSW Solid Waste Guidelines 1996. Council has a leachate and storm water management system in place for this facility. The leachate dam located at Woodenbong does have restricted capacity but the facility has never lost leachate and there has never been a recorded incidence of leachate leaving the facility. Council staff monitor the existing pond and irrigate back over the active cell when necessary.

**Response** - It is Council's view that the above mentioned leachate management system meet the proposed variation and as such if the licence is so varied the operations are compliant. Council is able to supply the EPA with drawings and capacities of the existing leachate management system.

### **06.5 Daily cover material.**

**Background** -Council employs the services of a local contractor to push and compact waste at the Woodenbong Waste Facility on a weekly basis. This is the only cost effective means Council has for this facility due to Council itself not having plant and equipment available in Woodenbong.

**Response**- Council opposes this proposed variation and seeks its removal due to the significant costs that this would impose noting that the Woodenbong facility is only open two days per week and the low volume of waste deposited. In support of Council's request for deletion Council is undertaken the following:

Council is currently reviewing all its waste management facilities, services and operations for future budgetary requirements, environmental liabilities and community expectations.

This review will result in the preparation of a waste management strategy which may result in the closure of some facilities or the enhancement of others. Council does not wish to prematurely invest in the Woodenbong facility until this process is completed, which is scheduled for 30 June 2014.

Council therefore seek to have this variation removed or held off for a period of one year to enable it to consider, adopt and implement its waste management strategy.

**06.6 The licensee must only dispose of waste at the premises in the current utilised landfill cell (as at 12 August 2013) unless the EPA amends this licence to expressly permit waste disposal elsewhere at the premises.**

**Background--** Council currently operates one small part of the active cell in the Woodenbong Waste Facility with intermediate capping of 300 mm depth applied to the remaining active cell .This enables Council to control storm waters and leachate collection efficiently.

**Response –** Council objects to the licence variation as it limits Council ability for continuation of landfilling in the said locality and will shorten the life expectancy of Woodenbong landfill active cell.

Woodenbong Waste Facility does have land available for future cell construction but due to the small quantity of waste received at the facility, the topography of the site and the budgetary obligation for the construction of a new waste cell. Council feels this would be an unnecessary and costly burden to place upon it rate payers, when the existing active cell has available void space and life expectancy to at least 2020.

Council wishes to have the EPA exempt this variation from the amended licence in the short term due to the following reasons:

Council is currently reviewing all its waste management facilities, services and operations for future budgetary requirements, environmental liabilities and community expectations.

This review will result in the preparation of a waste management strategy which may result in the closure of some facilities or the enhancement of others. Council does not wish to prematurely invest in the Woodenbong facility until this process is completed, which is scheduled for 30 June 2014.

Council therefore seek to have this variation removed or held off for a period of one year to enable it to consider, adopt and implement its waste management strategy.

Yours faithfully

Greg Meyers  
**Executive Manager**  
**Planning and Environment**