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SSD-11606719 – DADEC Throughput Increase – EPA Response to Addendum Amendment and Submissions Report

Dear Ms Laguna

Thank you for the referral to the Environmental Protection Authority (EPA) requesting review and advice on the *Eastern Creek REP Throughput Increase Addendum Amendment and Submissions Report* for the Eastern Creek Recycling Ecology Park, operated by Dial-A-Dump (EC) (Proponent), and located at 1 Kangaroo Avenue, Eastern Creek (Premises).

The EPA understands that the throughput increase assessed under SSD-11606719 (Project) has been amended. The changes include the removal of components now assessed and approved under MP06_0139-Mod 9 and to amend the staging for proposed new infrastructure. The increase in allowable waste in each stage of the Project has not changed and remains 500,000tpa in Stage 1 and 450,000tpa in Stage 2.

The EPA has reviewed the following documents:

- *Eastern Creek REP Throughput Increase Addendum Amendment and Submissions Report*, October 2025 and associated appendices, prepared by Arcadis and reviewed by JEP Environment & Planning (AASR)
- *Eastern Creek Recycling Ecology Park Recycling Infrastructure Optimisation Project (SSD-11606719) Amendment and Submissions Report*, October 2023, prepared by Arcadis (ASR)
- *EPA Comments on Amended Environmental Impact Statement Documents* for SSD-11606719 (24 January 2024) (EPA Comments 24 January 2024)

The EPA is largely satisfied with the response provided by the Proponent. The EPA has concluded its assessment and provide recommended conditions of consent and draft licence conditions.

The EPA provides comments on the AASR and associated appendices at Attachment A, recommended Conditions of Consent at Attachment B and provides draft EPL conditions for the Proponent's comment at Attachment C.

The EPA advises that should the Project be granted approval, the Proponent will need to apply for a variation to the environment protection licence (EPL) No.13426 and No.20121 for the Premises pursuant to Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act).

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If you have any further questions about this issue, please contact Damon Bolton on (02) 9995 6621 or at damon.bolton@epa.nsw.gov.au.

Yours sincerely,

DAMIEN ROSE.

25.11.2025

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ATTACHMENT A

The AASR includes the Proponents response to the EPA Comments 24 January 2024. The EPA has reviewed those responses and provide the following advice to the Department of Planning, Housing and Infrastructure (DPHI).

Recommended Conditions of Consent are at Attachment B and proposed EPL conditions are at Attachment C.

Air Quality Impact Assessment

1) Significant impacts at commercial and industrial receptors were predicted

In the EPA Comments 24 January 2024, the EPA raised concerns about the reliance on achieving high control efficiencies to mitigate dust emissions. The EPA recommended that the Proponent:

- a. Commit to the development and implementation of site-specific, measurable, and auditable key performance indicators to evaluate, in practice, the implementation of the nominated controls.
- b. Commit to undertake real time monitoring that can be used to:
 - i. Identify peaks in emissions that could result in adverse air quality impacts.
 - ii. Inform the implementation of any reactive mitigation measures.

In Appendix E of the AASR, the Proponent commits to:

- implementing a comprehensive real-time particulate matter monitoring system;
- the most likely real-time monitoring locations, based on the dispersion modelling results, would be established at the southern and eastern boundaries of the site which are closest to neighbouring receptors along with sites to the west and north for the measurement of upwind/downwind concentrations; and
- following the establishment of the monitors, a Trigger Action Response Plan (TARP) will be developed which will be linked to particulate matter concentrations and meteorological conditions.

EPA comment:

The Proponents' commitment to establishing a real-time particulate monitoring network is noted and the EPA will consider a variation to the EPL to formalise this commitment if DPHI grant approval for the Project.

However, the Proponent is still reliant on achieving high control efficiencies through managing truck movements. The EPA recommend the speed limits for access and internal roads, stated in the *Amended Air Quality Impact Assessment, Appendix H of the ASR*, be added as Conditions of Consent.

2) Additional exceedance days due to peak emissions

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In the EPA Comments 24 January 2024, the EPA raised concerns with the methodology used to analyse results for the 'Stage 2 operations theoretical busy day' not being in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW*.

In the AASR the Proponent states that the "busy day operations" scenario has been revised using the conventional paired-in-time approach. The 100th percentile traffic conditions upscaling factor of 1.6 has been applied to all predicted concentrations at all receptor locations, giving the equivalent of 4.72 Mtpa throughput. All other sources were upscaled including wind erosion emissions.

Under this scenario, the only additional exceedances are at industrial receptors C-18 and C-19. Analysis shows that the primary contributing source to the 5 highest incremental concentrations are associated with paved and unpaved roads.

The implementation of real-time particulate matter monitoring in combination with a TARP would allow for management of particulate matter emissions to minimise cumulative impacts at neighbouring receptors.

Bingo is committed to the planning and implementation of a comprehensive real-time particulate matter monitoring system at the Eastern Creek REP within six months of approval of SSD-11606719. This monitoring system will be used to establish a TARP, to be included in the site Air Quality, Odour and Greenhouse Gas Management Plan, which would be progressively prepared over a period of six months.

EPA Comment:

The use of the real-time particulate monitoring network in conjunction with the TARP is acknowledged.

The EPA recommends that the details of the operation of the TARP be considered by the EPA through a licence variation application. Proposed EPL conditions at Attachment C.

Noise

1) Adopting PNTL's

In the EPA Comments 24 January 2024, the EPA advised that in accordance with 'What the NSW EPA Considers when Developing Noise Conditions for Activities Assessed using the Noise Policy for Industry Acoustics Australia Vol. 51, No. 2, June 2023', the Project Noise Trigger Levels (PNTLs) should be amended in the consent to reflect what was identified as achievable for the project in the revised Noise Impact Assessment (NIA). The PNTLs identified as achievable were:

- levels of LAeq(15 minutes) 40/40/40 dBA under "full build" (i.e. Existing plus Stage 3 – Refer Revised NIA Figure 2-4) for residential receivers in Minchinbury under noise enhancing meteorological conditions; and,
- levels of LAeq(15 minutes) 35/35/35 dBA under "full build" (i.e. Existing plus Stage 3 – Refer Revised NIA Figure 2-4) for residential receivers in Erskine Park under noise enhancing meteorological conditions.

In the AASR, the Proponent asserts that the PNTLs provide a benchmark rather than a hard regulatory limit, serving as site-specific management thresholds that 'trigger' a management response (e.g. further investigation of noise mitigation measures). The Proponent acknowledges that this does not meet the 'What the NSW EPA Considers when Developing Noise Conditions for Activities Assessed using the Noise Policy for Industry Acoustics Australia Vol. 51, No. 2, June 2023', then asserts this guidance is considered to be more appropriate for application during the licencing phase, where operational variability and measurement methods can be fully defined.

The Proponent further asserts that as they consider the PNTLs are not a mandatory requirement, and to allow flexibility in the delivery of the Project while remaining lower than the EPL consent limit, the following PNTLs are proposed:

Receiver	Time of Day	EPL consent limit LAeq(15min)	Revised NVIA prediction LAeq(15min)	Proposed PNTL LAeq(15min)
Minchinbury Residential Receivers (R0-R9)	Day	48	40	44
	Evening	46	40	43
	Night	46	40	43
Erskine Park Residential Receivers (R10-R13)	Day	42	35	39
	Evening	42	35	39
	Night	40	35	38

EPA Comment:

The approach of adding 3-4dBA to the PNTLs identified by the proponent in their EIS to 'allow flexibility in the delivery of the project' is not in accordance with EPA guidance.

Planning legislation requires the identification of impacts and how those impacts may be mitigated, including required outcomes or objectives that must be met and criteria against which achievement of the outcome or objective must be assessed. The EPA do not agree that using the achievable PNTL's identified in the planning assessment phase should be restricted to the licencing phase. Limits required between both the consent and licence should be consistent.

The EPA recommend that should the proposal be approved, it be conditioned to include the PNTL's identified in the revised NVIA.

2) Site Workshop and the Maintenance and Manufacturing Workshop hours of operation

In Appendix A of the AASR, the Proponent provides inconsistent operating hours for the Site Workshop and Maintenance and Manufacturing Workshop. That is, the operating hours are proposed to be 12 hours per day between 6am and 6pm, consistent within existing approved hours of operation for the Eastern Creek REP. However, in Table 1-12 these hours are described as:

Monday – Friday 6:00am to 6:00pm
Saturday Sunday and Public Holidays - 5:00am to 9:00pm

EPA Comment:

The revised NVIA assumed the Site Workshop and the Maintenance and Manufacturing Workshop would be operational from 6am – 6pm, each day (including weekends and public holidays). The EPA recommend that should the proposal be approved, it be conditioned to include hours of operation for the Site Workshop and the Maintenance and Manufacturing Workshop accordingly.

Water

1) Discharge quality and frequency not defined for the north-eastern basin

In the EPA Comments 24 January 2024, the EPA recommended that a water characterisation assessment be undertaken for Basin B (north-eastern basin), similar to that recommended for the north-western basin (assessed and approved under MP06_0139-Mod 9).

The Proponent does not believe a water characterisation assessment of for Basin B should be required. This is because Basin B would capture surface water from the north-eastern catchment of the Proposal site, which is predominately sealed hardstand and does not contain waste storage or processing areas.

The Proponents also states that during construction, Basin B is intended to be used temporarily as a sediment basin, with no discharge offsite proposed. This would mitigate potential water quality and quantity impacts during construction. Following the completion of the construction program, Basin B would be desilted and converted to a detention basin (through the installation of hydraulic outlet controls).

EPA Comment:

The EPA is satisfied that the catchment of Basin B poses a much lower risk of generating contaminants than the north-western treatment train. The EPA does not recommend that the consent be conditioned to require water characterisation assessment of Basin B.

As Basin B is intended to be used as a temporary sediment basin during construction of Stage 2, the EPA recommend that the construction of Basin B is conditioned to be completed prior to Stage 2 commencing. Basin B must be designed, constructed, operated and maintained in accordance with *Managing Urban Stormwater: Soils and Construction Volume 1* (NSW Department of Housing, 2004), and be designed to capture and treat all sediment-laden runoff during a 90th-percentile 5-day rainfall event.

The EPA will require the Proponent to provide details for a new discharge point for Basin B in a licence variation application.

2) Pollutants in the north-west area discharge are at non-trivial levels

In the EPA Comments 24 January 2024, the EPA raised concerns about the segregated materials area (which is in the north-western area of the site) containing concrete stockpiles and the high pH identified in the amended *Surface Water Impact Assessment* (SWIA) being the likely cause. It is likely that other elevated pollutant levels are also due to surface water coming into contact with waste stockpiles in the north-western area.

In the AASR, the Proponents noted the recommendation for a revised surface water management plan. The Proponent further noted that a response to EPA concerns was provided under the Modification 9 approval, received on 30 April 2025. Proposed infrastructure substantially improves the performance of the existing surface water management system and meets or exceeds all relevant state and local stormwater management objectives.

EPA Comment:

The Proponent noted that the surface water management plan should be revised to demonstrate that all practical and reasonable measures to avoid or minimise water pollution and protect human health and the environment from harm have been investigated and implemented. The EPA recommend this is undertaken and be completed for the entire site, inclusive of the north-western area. This should be formalised as a Condition of Consent.

If the Project is approved, Stage 1 will see a 500,000tpa increase in waste. Based on the risk associated with surface water coming into contact with waste stockpiles in the north-western area under this scenario, the EPA recommend the consent be conditioned to require the water treatment infrastructure approved under MP06_0139-Mod 9 be completed prior to any increase in material throughput being approved.

3) All reasonable and feasible mitigation measures have not been implemented to prevent polluted discharges

In the EPA Comments 24 January 2024, the EPA highlighted that the SWIA identified that elevated levels of pollutants were being generated by the site during operation. This was most likely due to rainfall and other clean water contacting uncovered stockpiles of waste in the segregated waste area, such as metals and concrete. The EPA recommended that additional measures to prevent exposure of waste stockpiles to rainfall and stormwater runoff should be required.

In the AASR, the Proponent stated that runoff from the segregated materials area will discharge towards the north-western treatment train, as assessed and approved under MP06_0139-Mod 9. The Proponent further noted that the north-western treatment train would be a substantial upgrade of the existing site infrastructure and has been designed to manage runoff from operational areas of the facility. The Proponent asserted that runoff from the timber yard will continue to be pumped to the site leachate treatment system (i.e. will remain unchanged under Proposed conditions).

The Proponent asserts that the areas in the north-east would consist of roof and hardstand, with no waste processing or storage, the potential for polluted discharge would be reduced. Further, the frequency and volume of surface water discharge towards Upper Angus Creek is commensurate with rainfall and runoff from the local catchment that discharges towards proposed Basin B. The proposed rainwater tanks that will collect roof runoff from the Site Workshop and Maintenance Workshop will contribute to the reduction in frequency and volume of discharge towards Upper Angus Creek.

The Proponent further asserted that no uncovered stockpiles or waste areas will be located within the catchment that discharges towards Upper Angus Creek.

EPA Comment:

If this proposal is approved, the 12-month discharge monitoring program required in condition 28aa of the MOD 9 consent, should consider the 500,000tpa increase in waste material.

Clean water must be diverted away from entering the Site Workshop and the Maintenance and Manufacturing Workshop. The EPA recommend DPHI include a Condition of Consent similar to MP06_0139 condition 26(f).

Recommended Conditions of Consent at Attachment B.

ATTACHMENT B

Recommended Conditions of Consent

Air

1. A maximum speed of 25 km/hr must be sign posted and enforced on the access road.
2. A maximum speed of 10 km/hr must be sign posted and enforced on all internal roads.

Noise Limit Conditions

Operating hours

The Site Workshop and the Maintenance and Manufacturing Workshop operating hours are 6am – 6pm, each day.

- L6.1** Operational noise generated at the premises must not exceed the noise limits at the times and locations in the table below.

Location	Noise Limits in dB(A)			
	Day	Evening	Night	Night
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{AFmax}
Any residential premises in Minchinbury (Representative monitoring location 1-6 Eber Place Minchinbury)	40	40	40	52
Any residential premises in Erskine Park (Representative monitoring location 2-44 Warbler Street Erskine Park)	35	35	35	52

- L6.2** For the purposes of condition L6.1:

- a) Day means the period from 7am to 6pm Monday to Saturday and the period from 8am to 6pm Sunday and public holidays.
- b) Evening means the period from 6pm to 10pm.
- c) Night means the period from 10pm to 7am Monday to Saturday and the period from 10pm to 8am Sunday and public holidays.

- L6.3** Noise-enhancing meteorological conditions

- a) The noise limits set out in condition L6.1 apply under the following meteorological conditions:

Assessment Period	Meteorological Conditions
Day	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.

Evening	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.
Night	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level; or Stability category E and F with wind speeds up to and including 2m/s at 10m above ground level.

- b) For those meteorological conditions not referred to in condition L6.3(a), the noise limits that apply are the noise limits in condition L6.1 plus 5dB.

L6.4 For the purposes of condition L6.3:

- a) The meteorological conditions are to be determined from meteorological data obtained from the meteorological weather station identified as Bureau of Meteorology AWS at Horsley Park Equestrian Centre
- b) Stability category shall be determined using the following method from Fact Sheet D of the *Noise Policy for Industry* (NSW EPA, 2017):
 - i. Use of sigma-theta data (section D1.4).

L6.5 To assess compliance:

- a) with the $L_{Aeq(15\text{ minutes})}$ or the L_{Amax} noise limits in condition L6.1 and L6.3, the noise measurement equipment must be located:
 - (i) approximately on the property boundary, where any residence is situated 30 metres or less from the property boundary closest to premises; or where applicable,
 - (ii) in an area within 30 metres of a residence façade, but not closer than 3 metres where any residence on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable,
 - (iii) in an area within 50 metres of the boundary of a National Park or Nature Reserve,
 - (iv) at any other location identified in condition L6.1
- b) with the $L_{Aeq(15\text{ minutes})}$ or the L_{Amax} noise limits in condition L6.1 and L6.3, the noise measurement equipment must be located:
 - (i) at the reasonably most affected point at a location where there is no residence at the location; or,
 - (ii) at the reasonably most affected point within an area at a location prescribed by condition L6.5 (a).

L6.6 A non-compliance of conditions L6.1 and L6.3 will still occur where noise generated from the premises is measured in excess of the noise limit at a point other than the reasonably most affected point at the locations referred to in condition L6.5 (a) or L6.5 (b).

NOTE to L6.5 and L6.6: The reasonably most affected point is a point at a location or within an area at a location experiencing or expected to experience the highest sound pressure level from the premises.

L6.7 For the purpose of determining the noise generated from the premises, the modifying factor corrections in Table C1 in Fact Sheet C of the *Noise Policy for Industry* (NSW EPA, 2017) may be applied, if appropriate, to the noise measurements by the noise monitoring equipment.

L6.8 Noise measurements must not be undertaken where rain or wind speed at microphone level will affect the acquisition of valid measurements.

M8 Requirement to Monitor Noise

M8.1 *Attended noise monitoring must be undertaken in accordance with Condition L6.5 and must:*

- a) occur at each location specified in Condition L6.1;
- b) occur annually in a reporting period;
- c) occur during each day, evening and night period as defined in the *Noise Policy for Industry* for a minimum of:
 - 1.5 hours during the day;
 - 30 minutes during the evening; and
 - 1 hour during the night.
- d) occur for three consecutive operating days.

NOTE: Where direct measurement of noise at the receiver locations in L6.1 is not viable due to extraneous or high ambient noise levels, alternative compliance measurement protocols may be negotiated with the consent / regulatory authority.

Reporting Conditions

R4 Noise Monitoring Report

A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the annual monitoring. The assessment must be prepared by a competent person and include:

- a) an assessment of compliance with noise limits presented in Condition L6.1 and L6.3; and
- b) an outline of any management actions taken within the monitoring period to address any exceedances of the limits contained in Condition L6.1 and L6.3.

Additions to Definition of Terms of the licence

- Noise Policy for Industry - the document entitled "*Noise Policy for Industry*" published by the NSW Environment Protection Authority in October 2017.
- Noise – 'sound pressure levels' for the purposes of conditions L6.1 to L6.8.
 - $L_{Aeq(15\text{ minute})}$ - the value of the A-weighted sound pressure level of a continuous steady sound that, over a 15 minute time interval, has the same mean square sound pressure level as a sound under consideration with a level that varies with time (Australian Standard AS 1055:2018 *Acoustics: description and measurement of environmental noise*).
- L_{AFmax} – the maximum sound pressure level of an event measured with a sound level meter satisfying Australian Standard AS IEC 61672.1-2013 *Electroacoustics - Sound level meters - Part 1: Specifications* set to 'A' frequency weighting and fast time weighting.

Water

1. Construction of the north-western water treatment train, approved under MP06_0139-Mod 9, must be completed prior to stage 1 of the Project
2. Basin B must be:
 - a. constructed prior to stage 2a earth works; and

- b. constructed, operated and maintained in accordance with Managing Urban Stormwater: Soils and Construction Volume 1 (NSW Department of Housing, 2004), and at a minimum, be designed to capture and treat all sediment-laden runoff during a 90th-percentile 5-day rainfall event.
- 3. Prior to the commencement of Stage 1 of the Project, the Proponent must amend the Surface Water Management Plan for the Premises to:
 - a. Identify how clean surface and stormwater is prevented from coming into contact with waste; and
 - b. demonstrates that all practical and reasonable measures to avoid or minimise water pollution have been investigated and implemented.
- 4. All surface and stormwater must be prevented from entering the Site Workshop and the Maintenance and Manufacturing Workshop.

ATTACHMENT C

Draft EPL Conditions

Commented [DR1]: Needs to distinguish what's on the landfill and what's on the MRF licence

Noise

Proposed conditions to be added to EPL 13426, consistent with conditions on EPL 20121:

O6.15 All mobile plant must be fitted with non-tonal reverse alarms.

O6.16 Any engine operating outside the buildings must be housed in a noise insulated cowling hood or structure

Air

Proposed condition to be added to EPL 20121:

U2 Implementation of real-time monitoring

U2.1 The objective of this condition is to implement a real-time particulate monitoring network for the premise.

U2.2 Within 6 months of approval of the Project, and prior to any construction or increase in material throughput, the licensee must develop and implement a real-time particulate monitoring network. The monitoring network must consider all onsite particulate matter emissions sources, prevailing winds and receptor locations. The monitoring network must consist of at least four monitors as outlined in the EIS and supporting documents for the increased throughput (the Project).

The development of the monitoring network should also consider NSW EPA's Ambient air monitoring guidance note, available here:
<https://www.epa.nsw.gov.au/sites/default/files/22p3489-ambient-air-monitoring-guidance-note.pdf>

NOTE: EPA may use the information provided to include additional conditions on this licence.

U2.3 The licensee must provide to the EPA a detailed description of the monitoring network, including, but not limited to:

- a) the details of the specific monitors installed, and particulate matter size fractions monitored,
- b) the locations (latitude and longitude and map) of the monitors,
- c) the onsite sources, meteorological conditions and receptors that each monitor captures,

U3 Development of site-specific TARP

U3.1 The objective of this condition is to develop and implement a site-specific Trigger Action Response Plan (TARP) to minimise offsite impacts of particulate matter emissions.

NOTE: EPA may use the information provided to include additional conditions on this licence.

U3.2 Within 6 months of approval of the Project, the licensee must develop a TARP for the premise in conjunction with U1. The licensee must provide EPA with an outline of the TARP that includes:

- a) The triggers for each monitor, including the PM₁₀ concentrations and the meteorological conditions (wind speed and direction),
- b) the associated actions for each trigger and the required time period for implementation (i.e. 1 hour),
- c) the recording and reporting procedures, and
- d) the TARP review and update procedures.

The results of the dispersion modelling used to support the development of the TARP must also be provided to the EPA.

U4. Evaluation of effectiveness of reactive management practices

U4.1 The objective of this condition is to review the implemented reactive management practices to ensure they remain effective for minimisation of particulate impacts.

U4.2 Upon the completion of the first 12 months of Stage 2 of the Project, the licensee must undertake a review of the reactive mitigation and management measures implemented, including the number and location of monitors, the meteorological and particulate matter concentration triggers and the associated responses and actions.

U4.3 The licensee must provide EPA with a report (the Reactive Management Report) within six weeks of completing the review. The Reactive Management Report must include, but not necessarily limited to, the following:

- a) A summary of the onsite dust generating activities, including annual and peak daily throughput,
- b) A summary of the ambient air monitoring data collected in the previous years of operations and comparison against relevant criteria in the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW*,
- c) A summary of the number of times the TARP was triggered, with details of the time/date and duration and the location of monitor,
- d) The particulate matter concentrations and meteorological conditions measured at the times the TARP was triggered,
- e) The actions that were undertaken in response to the trigger, the time taken to respond to the trigger,
- f) An evaluation of the effectiveness of the TARP in minimising offsite dust impacts at receptors, and
- g) Recommendations for improvement of the reactive management measures.