

Sheelagh Laguna

Principal Planning Officer
Energy & Resource Industry Assessments
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

25 May 2026

Response to EPA and Blacktown City Council advice – DADEC Throughput Increase (SSD-11606719)

Dear Sheelagh,

Thank you for forwarding the advice provided by the NSW Environment Protection Authority (EPA) dated 4 May 2026 and Blacktown City Council (Council) dated 5 May 2026, in response to the additional information submitted by Bingo Industries (BINGO) on behalf of Dial-A-Dump (EC) (DADEC) on 17 April 2026 in support of the proposed throughput increase proposal at the Eastern Creek Recycling Ecology Park (SSD-11606719) (the Project).

DADEC notes the matters raised in your covering email of 6 May 2026. With respect to the EPA's comments on dust, DADEC must respectfully record that the EPA's suggested causal link between the reported dust impacts in the Minchinbury community and stockpiling activities at the site has not been substantiated. The EPA's advice expresses a belief that recent reports of dust impacts are "likely related" to RDF stockpiling, but does not identify any monitoring data, source apportionment analysis, dust deposition gauge results, or other evidence that establishes the site as the source of those impacts. The Minchinbury area sits within a broader industrial and transport catchment containing multiple potential dust sources. This Project has been under assessment for several years. This comment has not been raised in the submission prior to this (dated 4 February 2026) by the EPA as a matter requiring resolution as part of this consent. DADEC does not consider it appropriate for an unsubstantiated and potentially unrelated concern to be introduced at this stage of the assessment process and respectfully requests that the EPA's comments on dust derived from timber stockpiles be considered on that basis. Notwithstanding this position, and as set out in the response table below, DADEC remains committed to continuous improvement in dust management at the site and will continue to engage constructively with the EPA on this matter outside the SSD process.

As part of the Project, DADEC is seeking to increase the any one time stockpile limit from 667,000 tpa to 950,000 tpa. The stockpile plan considers both combustible and non-combustible stockpiles and has been developed in accordance with FRNSW *Fire Safety Guideline: Fire Safety in Waste Facilities*. The Project includes a detailed assessment of the facility stockpiling material at the increased limit including air quality modelling of these volumes. The air quality assessment did not identify any material impacts to nearby residential receivers from the increase in the any one time storage limit.

DADEC takes its environmental obligations seriously and is committed to working constructively with the Department, the EPA and Council to resolve the outstanding matters. With respect to dust and stockpile management, DADEC has made significant investment in recent years in undercover product storage, enclosed shredding of RDF product and a semi enclosed load out bay. Importantly,

all processed RDF material is stored within dedicated undercover storage bays while some pre shredded RDF material is stored outside as permitted under the current Project Approval. DADEC have previously commissioned EMM to undertake an independent air quality audit, including timber yard operations which confirmed that appropriate air quality controls are in place to mitigate potential dust impacts.

DADEC is also currently investigating multiple methods for further managing potential impacts including construction of the Mod 9 infrastructure and expansion to the undercover timber yard storage and processing area which will provide additional covered storage for RDF material.

With respect to Basin B, DADEC has engaged its civil and water engineering consultants AT&L to prepare amended documentation that updates the basin design, the supporting DRAINS and MUSIC models, and the internal drainage details, so that the 1% AEP design event is contained within the embankment and the inconsistencies identified by Council are resolved.

Table 1 below sets out each of the comments raised by the EPA and Council in their respective letters, together with DADEC's response. Amended technical documentation addressing Council's engineering and drainage matters has been appended to this letter.

Table 1 DADEC response to EPA and Blacktown City Council advice (May 2026)

Comment	DADEC Response
NSW EPA	
The EPA has reviewed the response to additional RFI and the only response to the EPA's previous comments is related to noise. The EPA's position on this matter has not changed and the EPA reiterates that adopting the predicted noise levels made in the Environmental Assessments is in line with our guidance on assessing noise against the Noise Policy for Industry.	Noted.
Additional Comment - Dust The EPA notes that based on recent field inspections, the Proponent has a significant amount of Refuse Derived Fuel (RDF) stockpiled at both Licensed Premises. The EPA believes that recent reports of dust impacts from the Minchinbury community are likely related to the increase in RDF material being stockpiled and the poor management of these stockpiles. The Proponent has indicated that a licence variation to increase the amount of RDF permitted to be stockpiled would be required if approval for the Throughput Increase is granted. However, considering the objects of the Protection of the Environment Operations Act 1997 (Act) and section 45 of the Act, the Proponent would need to demonstrate how dust from an increase in RDF material would be managed before the EPA could approve a licence variation for this.	DADEC does not accept the EPA's suggested causal link between the reported dust impacts in the Minchinbury community and stockpiling activities at the site. The EPA's advice expresses a belief that those impacts are "likely related" to RDF stockpiling at the site, but does not identify any monitoring data, source apportionment analysis or dust deposition gauge results that establish the site as the source. The site's boundary and ambient monitoring data submitted with the Environmental Assessment do not indicate exceedances attributable to site operations, and the Minchinbury area sits within a broader industrial and transport catchment with multiple potential dust sources. DADEC respectfully submits that an unsubstantiated and potentially unrelated concern should not be introduced into the determination of this Project at this stage of the assessment. With respect to the EPA's comments on a future licence variation, DADEC notes that any application to vary EPL 20121 to increase permitted RDF storage volumes would only be lodged following the grant of consent and the completion of further design and operational planning work, and is likely to be a number of years away. The matters the EPA has raised under section 45 of the Protection of the Environment Operations Act 1997 are therefore properly considered at the time of any such licence variation application, on the evidence then available, and are not relevant to the Department's determination of the throughput increase under SSD-11606719. DADEC will engage with the EPA on the supporting documentation required at that time, including any updated dust management plan, and confirms its commitment

Comment

The EPA considers the indoor stockpiling of RDF material to be the best management option to reduce dust impacts. Noting the shed approved under MP06_0139-Modification 9 (Mod 9) (not yet constructed) would provide additional indoor storage space for RDF material, DPHI may consider conditioning the completion of this shed prior to any additional material being brought onto the premises.

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to demonstrating compliance with section 45 of the Act in connection with any future licence variation.

Notwithstanding DADEC's position on the matters above, DADEC remains committed to continuous improvement in dust management at the site. DADEC is investigating multiple methods for further managing potential dust impacts, including construction of the Mod 9 infrastructure and expansion of the undercover timber yard storage and processing area, both of which will provide additional covered storage for RDF material. These measures are being progressed independently of the throughput increase assessment and are supported by the advice of independent third party expert consultants.

DADEC does not accept the EPA's recommendation that DPHI condition the completion of the Mod 9 shed prior to any additional material being brought onto the premises, and respectfully requests that the Department disregard this recommendation in its determination of the Project. The Environmental Assessment, the Response to Submissions Report and the further information provided in April 2026 do not identify any impact arising from current or proposed stockpiling activities that would warrant the construction of the Mod 9 shed being made a precondition to the throughput increase. The recommendation is predicated on the same unsubstantiated causal link between site activities and dust impacts in the Minchinbury community, which DADEC does not accept. DADEC and the EPA have worked together on this Project over a period of several years, including through the original Environmental Assessment, several rounds of consultation, the Response to Submissions process, the further information request in 2025 and the additional information provided in April 2026. At no point during that engagement has the EPA identified the completion of the Mod 9 shed as a matter requiring resolution before the throughput increase could be approved. Introducing a recommended condition of this scope at this late stage of the assessment, on the basis of a recently asserted but unfounded suspicion of impacts is unfairly prejudicial for the Department's consideration of the Project. For completeness, DADEC confirms that the Mod 9 infrastructure remains an approved project and progression of this project is being

Comment	DADEC Response
	assessed by DADEC independently of the throughput increase as part of DADEC's ongoing dust management measures at the site.
The EPA recommends that conditions of consent requiring all RDF product 1 being stored in three-sided storage bays and all loose (unbaled and unwrapped) RDF Product 2 being stored and loaded for dispatch within MPC1 are carried forward if the Throughput Increase is approved.	Noted.
In addition to dust impacts from RDF, the EPA has observed dust generated by activities in the Segregated Material Area. The EPA recommend MP06_0139 Schedule 3 condition 55, requiring all stockpiles to be no higher than the berms, barriers or visual screens, be carried forward if the Throughput Increase is approved.	Whilst DADEC object to the EPA introducing alleged, unrelated compliance issues at this stage of the Approval, it has no objection to this condition of consent being carried forward if this Proposal is approved.
The EPA advises that should the Project be granted approval, the Proponent will need to apply for a variation to the RRC Licence and the Landfill Licence pursuant to Schedule 1 of the Act.	Noted.
Blacktown City Council	
1. Asset Design Engineering Issues Council does not support the overtopping of basin embankments for events up to and including the 1% AEP design event (i.e. 1% AEP TWL is RL68.27 while the spillway is RL68.00). The submission is not currently acceptable. The applicant needs to submit amended documentation addressing the following: a) Models and plans to be amended for consistency. b) Basin B design updated to ensure overtopping of the embankment does not happen for events up to and including the 1 % AEP design event.	Amendments have been made to the MUSIC model, drawings and SSDA report to address the inconsistency in bio-retention areas and catchment areas. For clarity, the proposed bio-retention within Basin B will have a minimum filter area of 575m² to satisfy Council's pollutant reduction targets for the catchment draining to it. Please refer to amended drawing C318 incorporating revised levels at the Basin B spillway (RL 68.30). This amendment addresses Council's comment regarding overtopping of the basin in events up to and including the 1% AEP design event.
2. Drainage Issues	Please refer to amended drawing C318 incorporating revised levels at the Basin B spillway (RL 68.30). This amendment addresses Council's comment

Comment

Council has reviewed the DRAINS and MUSIC model as submitted by the applicant on 23 February 2026, and the response to Council's RFI and updated plans dated 17 April 2026.

Council does not support the overtopping of basin embankments for events up to and including the 1 % AEP design event (i.e. 1 % AEP TWL is RL68.27 while the spillway is RL68.00).

Furthermore, details for the internal pipe and pit design have not been included.

Specifically, the area exceeding 43000 sqm is discharging into the proposed basin via a single outlet with a differential of approx. 12 m high. As such, the submission in its current form is not acceptable.

The applicant needs to submit amended documentation addressing the following:

- a) Models and plans to be amended for consistency. For example, the proposed bioretention basin areas show 400 sqm on the plan when the MUSIC model utilise 650sqm.
- b) Basin B design shall be updated to ensure the water quality and quantity control are designed in accordance with the OSD spreadsheet and MUSIC model. And the configuration of the basin shall be included to show the control pits, spillway and all connection clearly.
- c) A detailed internal drainage design must be provided, including dimension of the pit and pips, design level and the longitudinal sections.

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regarding overtopping of the basin in events up to and including the 1% AEP design event.

Stormwater long sections for the internal stormwater drainage system are not required to support the SSDA. However, to address Council's concern regarding the level difference between the Maintenance Workshop hardstand and Basin B a long section has been provided on drawing C319. This shows a drop pit will be required to accommodate the level difference between the hardstand and Basin B.

Further to conversations between Council representative (Alex Kwok) and AT&L, it is confirmed that the stormwater pit upstream of the bio-retention basin will be a private asset. Council's concerns regarding the depth and access limitations have been noted. The exact dimensions and depth of the pit will be subject to confirmation post-approval during the detail design phase. The pit will be designed to relevant Australian Standards and will incorporate appropriate access and Safety in Design requirements.

Amendments have been made to the MUSIC model, drawings and SSDA report to address the inconsistency in bio-retention areas and catchment areas. For clarity, the proposed bio-retention within Basin B will have a minimum filter area of 575m² to satisfy Council's pollutant reduction targets for the catchment draining to it.

Should you have any further queries please don't hesitate to contact the undersigned or require further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Searle', with a stylized, cursive script.

Brad Searle

Environment, Approvals and Regulatory Compliance Manager
0408 204 054